



July 2024

# TRANSPORTATION EQUITY

## DOT Could Improve Some Performance Goals to Better Assess Progress

# GAO Highlights

Highlights of [GAO-24-105652](#), a report to congressional committees

## Why GAO Did This Study

DOT's mission is to deliver a transportation system that serves the American people. The Biden administration has issued a series of executive orders to help advance equity, and DOT added equity as a department-wide strategic goal in response.

House Report 117-99 includes a provision for GAO to examine DOT's equity-related efforts. This report examines (1) to what extent DOT's equity performance goals are consistent with selected federal performance management practices, and (2) how DOT assesses and uses information to manage its equity efforts.

GAO analyzed DOT performance management documents, such as its fiscal year 2025 annual performance plan, fiscal year 2023 performance report, fiscal year 2022-2026 strategic plan, and 2023 equity action plan update, and interviewed DOT officials. GAO compared information in these documents to performance management practices GAO selected from relevant federal statutes and guidance, and prior GAO work.

## What GAO Recommends

GAO is making three recommendations to DOT to ensure each equity performance goal is consistent with the performance management practices of identifying near-term targets, demonstrating clarity, and describing accuracy and reliability. DOT concurred with GAO's recommendations.

View [GAO-24-105652](#). For more information, contact Elizabeth Repko at (202) 512-2834 or [repkoe@gao.gov](mailto:repkoe@gao.gov).

July 2024

# TRANSPORTATION EQUITY


## DOT Could Improve Some Performance Goals to Better Assess Progress

### What GAO Found

The Department of Transportation (DOT) added a new strategic goal in its fiscal year 2022-2026 strategic plan that aims to reduce inequities across the transportation system. DOT also established 14 performance goals to assess progress toward this equity strategic goal. DOT defines equity as the consistent and fair treatment of all individuals, including those who belong to underserved communities, among other things. These equity performance goals relate to a variety of DOT's activities, such as its discretionary grant programs, contract awards, and community outreach efforts.

GAO found that DOT's equity performance goals are mostly consistent with six selected performance management practices (see figure). For example, each of the performance goals is consistent with the practices of describing linkage; identifying a goal leader; and being objective, quantifiable, and measurable.

**Number of DOT's 14 Equity Performance Goals Consistent with Selected Performance Management Practices**

Performance management practice	GAO assessment
<b>Linkage:</b> agency describes how the performance goal contributes to the strategic goal.	
<b>Goal leader:</b> agency identifies goal leader or lead office.	
<b>Objective, quantifiable, measurable:</b> agency states the level of performance to be accomplished within a timeframe.	
<b>Near-term targets:</b> agency identifies targets for the current and subsequent year.	
<b>Clarity:</b> agency ensures performance measure is consistent with its methodology.	
<b>Accuracy and reliability:</b> agency describes how it verifies and validates the data.	

Source: GAO icons and analysis of the Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 performance plan and performance management practices. | [GAO-24-105652](#)

However, some performance goals are inconsistent with the practices of identifying near-term targets; demonstrating clarity; and describing accuracy and reliability. For example, with regard to the practice of accuracy and reliability, DOT did not describe how it verified and validated data used to measure progress toward eight of its equity performance goals. Performance goals that are consistent with performance management practices could better position DOT, external stakeholders, and other decision-makers to assess progress toward DOT's equity strategic goal.

DOT is taking steps to assess and use information to manage its equity efforts. These steps, which are ongoing, include assessing the sufficiency of its current performance information and using early information from its performance reviews to guide some programmatic decision-making. For example, one of DOT's equity performance goals is to increase transit grants for rural or tribal areas. DOT officials stated that they are using information related to this performance goal to help improve outreach to those areas.

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## Abbreviations

DBE	disadvantaged business enterprise
DOT	Department of Transportation
Evidence Act	Foundations for Evidence-Based Policymaking Act of 2018
GPRA	Government Performance and Results Act of 1993
GPRAMA	GPRA Modernization Act of 2010
IIJA	Infrastructure Investment and Jobs Act
OMB	Office of Management and Budget

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July 23, 2024

### Congressional Committees

The Department of Transportation’s (DOT) mission is to deliver a transportation system that serves the American people and economy through the safe, efficient, sustainable, and equitable movement of people and goods. Starting in January 2021, the Biden administration issued a series of executive orders to help advance equity by increasing federal investment in disadvantaged and underserved communities, among other things.<sup>1</sup> For example, Executive Order 13985 states that federal executive departments and agencies should pursue a comprehensive approach to advancing equity for all, including underserved communities, through their policies and programs.<sup>2</sup>

In response to the executive orders, DOT added equity as a department-wide strategic goal in its fiscal year 2022-2026 strategic plan. DOT also established numerous equity performance goals to help assess progress toward its equity strategic goal. DOT subsequently released in January 2022 an equity action plan, as required by an executive order, to highlight efforts to expand access and opportunity to all communities while focusing on underserved and disadvantaged communities.<sup>3</sup> For these and other equity efforts, DOT defines equity as the consistent and systematic fair, just, and impartial treatment of all individuals, including those who

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<sup>1</sup>Under Executive Order 13985, the term “underserved communities” refers to populations sharing a particular characteristic, as well as geographic communities, who have been systematically denied a full opportunity to participate in aspects of economic, social, and civic life. This term includes Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. Exec. Order 13985, *Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (Jan. 20, 2021). Executive Order 14091 uses a nearly identical definition of “underserved communities.” See Exec. Order 14091, *Further Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (Feb. 16, 2023).

<sup>2</sup>See Exec. Order 13985 § 1.

<sup>3</sup>Executive Order 13985 required agencies to consult with certain federal government officials to produce plans for addressing any barriers to full and equal participation in selected agency programs and procurement and contracting opportunities. See Exec. Order 13985 § 7. Executive Order 14091 later required agencies to submit in September 2023, and annually thereafter, an equity action plan, which must be public and include progress updates, among other things. Exec. Order 14091 § 3.

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belong to underserved communities that have been denied such treatment.<sup>4</sup>

According to DOT, the Infrastructure Investment and Jobs Act (IIJA) and Inflation Reduction Act provided significant federal funding to help support DOT's equity strategic goal across its programs.<sup>5</sup> As such, DOT states that it is advancing transportation equity across IIJA and Inflation Reduction Act programs using various strategies, including increased transportation funding for rural and tribal areas and equity considerations in awarding grants under competitive grant programs.

House Report 117-99, which was incorporated by reference into the explanatory statement accompanying the Consolidated Appropriations Act, 2022, includes a provision for GAO to examine DOT's efforts related to equity, among other things.<sup>6</sup> In this report, we (1) assess to what extent DOT's equity performance goals are consistent with selected federal performance management practices, and (2) describe how DOT assesses and uses information to manage its equity efforts.

For both objectives, we focused on DOT's transportation equity efforts after Executive Order 13985 was issued in January 2021. We reviewed applicable statutes, regulations, orders, and Office of Management and Budget (OMB) guidance. We also reviewed the most current DOT performance management documents available at the time of our analysis, including DOT's fiscal year 2022-2026 strategic plan, 2022 equity action plan, and 2023 equity action plan update. Our review focused on information related to 14 of DOT's equity performance goals—12 performance goals included under its equity strategic goal, as well as two other performance goals DOT determined to be transportation equity-focused in its fiscal year 2025 annual performance plan.<sup>7</sup> We also reviewed updated information on DOT's website, attended DOT's equity-

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<sup>4</sup>DOT adopted the same definition of equity as Executive Order 13985. See Exec. Order 13985 § 2.

<sup>5</sup>According to DOT's 2023 equity action plan update, IIJA authorized a total of up to \$660.8 billion for DOT over 5 years for dozens of programs and DOT received a total of \$5.6 billion for four programs under the Inflation Reduction Act.

<sup>6</sup>H.R. Rep. No. 117-99, at 8-9 (2021).

<sup>7</sup>We did not include in our review six performance goals under DOT's organizational excellence strategic goal that DOT also considers to be equity-focused because the goals were not included in DOT's equity action plan. Further, these goals were more focused on internal DOT workforce issues such as the ability to attract, develop, retain, and train capable and diverse employees.

related webinars and updates, and attended DOT’s advisory committee on transportation equity public meetings to keep abreast of DOT’s equity efforts more broadly during the course of our audit work.

To determine the extent to which DOT’s equity performance goals are consistent with selected federal performance management practices, we first reviewed the Government Performance and Results Act of 1993 (GPRA) and GPRA Modernization Act of 2010 (GPRAMA) requirements. We then reviewed OMB guidance to agencies on implementing these requirements, and our prior work that identified leading practices for performance goals and key attributes of performance measures.<sup>8</sup> From this review, we identified six practices that are: (1) based in law, OMB guidance implementing the law, or prior GAO work, (2) relevant for evaluating individual performance goals or measures, and (3) not duplicative of one another. Collectively, we refer to these six criteria as federal performance management practices (see table 1).

**Table 1: Selected Federal Performance Management Practices for Analyzing Performance Goals**

<b>Performance management practice</b>	<b>Definition</b>
Linkage	The agency describes how the performance goal contributes to its associated strategic goal.
Goal leader	The agency identifies a goal leader or lead office responsible for the performance goal.
Objective, quantifiable, measurable	The agency states the level of performance to be accomplished within a time frame for the performance goal, expressed as a tangible, measurable target or as a quantitative standard, value, or rate.
Near-term targets	The agency includes a target level of performance or milestone for the current and subsequent fiscal year for the performance goal.
Clarity	The agency ensures that the performance measure is clearly worded, and the measure is consistent with the methodology used to calculate it.
Accuracy and reliability	The agency describes how it will ensure the accuracy and reliability of the data used to measure progress toward the performance goal.

Source: GAO analysis of selected federal performance management practices. | GAO-24-105652

<sup>8</sup>OMB Circular A-11 uses the term performance indicator, but for the purposes of our report and consistency with prior GAO work, this report uses the term performance measure. OMB Circular No. A-11, § 200.24 (Washington, D.C.: Aug. 2023); GAO, *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002). GPRAMA updated and amended the performance management framework that GPRA established. See Pub. L. No. 103-62, 107 Stat. 285 (1993) (GPRA); Pub. L. No. 111-352, 124 Stat. 3866 (2011) (GPRAMA).



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Additionally, to determine whether each of DOT's 14 equity performance goals were consistent or inconsistent with the six selected federal performance management practices, we reviewed DOT's most current documents with information on its equity performance goals at the time of our assessment. These documents included DOT's fiscal year 2025 annual performance plan, fiscal year 2023 annual performance report, and any supplementary documentation DOT provided on the goals' methodologies.<sup>9</sup> In addition, we reviewed information obtained during interviews with DOT officials in the lead offices responsible for each equity performance goal. We also reviewed DOT's 2024 annual performance plan and fiscal year 2022 annual performance report, and analyzed the changes made from these documents to the most current documents.

To determine how DOT assesses and uses information to manage its equity efforts, we reviewed DOT's performance management documents noted above, as well as DOT's learning agenda which identifies its evidence-building priorities, and fiscal year 2024 and 2025 evaluation plans. We interviewed relevant DOT officials regarding their efforts and reviewed relevant agency requirements in the Foundations for Evidence-Based Policymaking Act of 2018 (Evidence Act),<sup>10</sup> OMB's guidance to agencies on the Evidence Act, and GPRAMA. We also reviewed our past work on implementing evidence-building and performance management activities.<sup>11</sup> Given the recency of DOT's equity strategic goal—which it established in fiscal year 2022—we did not conduct a full evaluation of DOT's efforts in this area, but we were able to identify examples of actions that are in line with some of these key practices.

We conducted this performance audit from January 2023 to July 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that

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<sup>9</sup>DOT's annual performance report is referred to by the department as its Performance Data Completeness and Reliability Report.

<sup>10</sup>Pub. L. No. 115-435, 132 Stat. 5529 (2019).

<sup>11</sup>GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023). This July 2023 guide summarizes GAO's extensive body of work on effectively implementing federal evidence-building and performance management activities. It also identifies key practices to help federal agencies develop and use evidence to effectively manage and assess the results of their efforts.

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the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Performance management is a three-step process by which organizations: (1) set goals to identify the results they seek to achieve, (2) collect and assess performance information (which is a type of evidence) to measure progress, and (3) use that information to analyze results and inform decisions to ensure further progress toward achieving those goals.<sup>12</sup>

Several government-wide laws and related guidance established a framework for federal agencies to manage performance by establishing goals and assessing, building, and using evidence in decision-making across the federal government:

- GPRAMA is one of a series of laws designed to improve federal performance management. GPRAMA requires agencies to produce strategic plans every 4 years and annual performance plans.<sup>13</sup> The act also requires agencies to set goals, measure results, and report progress.<sup>14</sup>
- The Evidence Act created a framework for federal agencies to take a more comprehensive and integrated approach to evidence building, and to enhance the federal government's capacity to undertake those activities.<sup>15</sup> The Evidence Act requires an agency to develop an evidence-building plan called a learning agenda every 4 years (as part of an agency's strategic plan), and an annual evaluation plan.<sup>16</sup>

DOT's strategic plan outlines its strategic goals, which are to be outcome-oriented, long-term goals for its major functions and operations. DOT

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<sup>12</sup>[GAO-23-105460](#).

<sup>13</sup>5 U.S.C. § 306; 31 U.S.C. § 1115(b).

<sup>14</sup>31 U.S.C. §§ 1115(b), 1116.

<sup>15</sup>Pub. L. No. 115-435, 132 Stat. 5529 (2019). The Evidence Act defines evidence as information produced as a result of statistical activities conducted for a statistical purpose. See 5 U.S.C. § 311(4) (incorporating the definition of "evidence" under 44 U.S.C. § 3561). According to OMB guidance, for the purposes of performance management, evidence is viewed more broadly as the available body of facts or information indicating whether a belief or proposition is true or valid. As such, evidence can be quantitative or qualitative and may come from a variety of sources, including foundational fact finding, performance measurement, policy analysis, and program evaluation. OMB Circular A-11, § 200.24.

<sup>16</sup>5 U.S.C. § 312.

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introduced an equity strategic goal to reduce inequities across the nation's transportation systems and the communities they affect in its fiscal year 2022-2026 strategic plan. DOT's equity strategic goal has four associated strategic objectives that specify the impact DOT is trying to achieve: expanding access; wealth creation; power of community; and proactive intervention, planning, and capacity building.<sup>17</sup> Under these four objectives, DOT established equity performance goals in its performance plan to help measure progress toward its equity strategic goal. Performance goals are target levels of performance to be accomplished within a time frame. In their annual performance plans, agencies are required to review and update their performance goals and targets.<sup>18</sup>

As of its fiscal year 2025 annual performance plan, DOT had 12 equity performance goals under its equity strategic goal, and two other performance goals DOT determined to be transportation equity-focused.<sup>19</sup> See figure 1 for DOT's strategic equity framework as of its fiscal year 2025 annual performance plan.

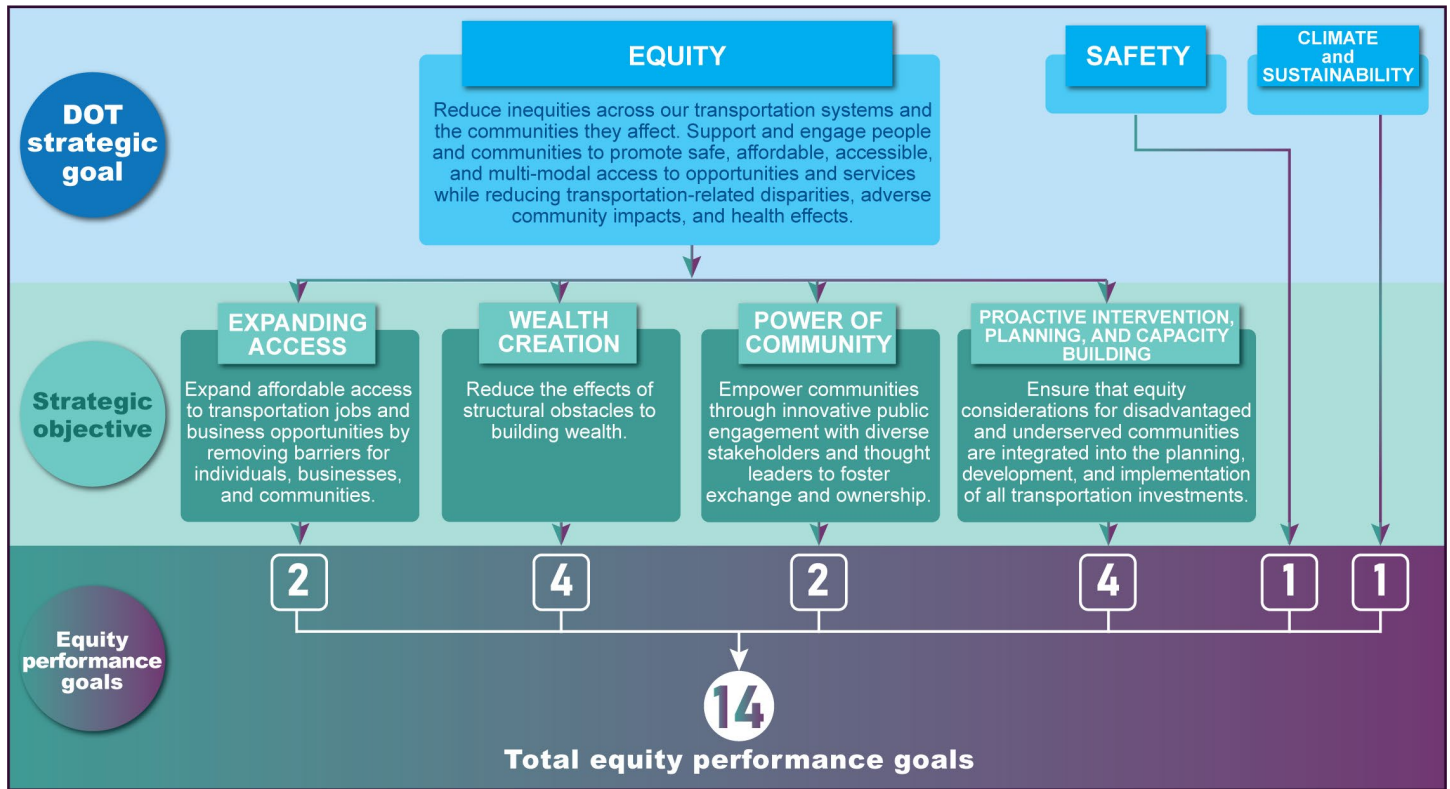
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<sup>17</sup>Equity is one of DOT's six strategic goals. DOT's five other strategic goals are: safety, economic strength and global competitiveness, climate and sustainability, transformation, and organizational excellence.

<sup>18</sup>See 31 U.S.C. § 1115(b); OMB Circular A-11 § 230.5.

<sup>19</sup>The two additional performance goals that DOT determined to be equity-focused include the: (1) race fatality ratio performance goal within DOT's safety strategic goal, and (2) benefits to disadvantaged communities performance goal within DOT's climate and sustainability strategic goal.

**Figure 1: DOT's Strategic Equity Framework as of Its Fiscal Year 2025 Annual Performance Plan**



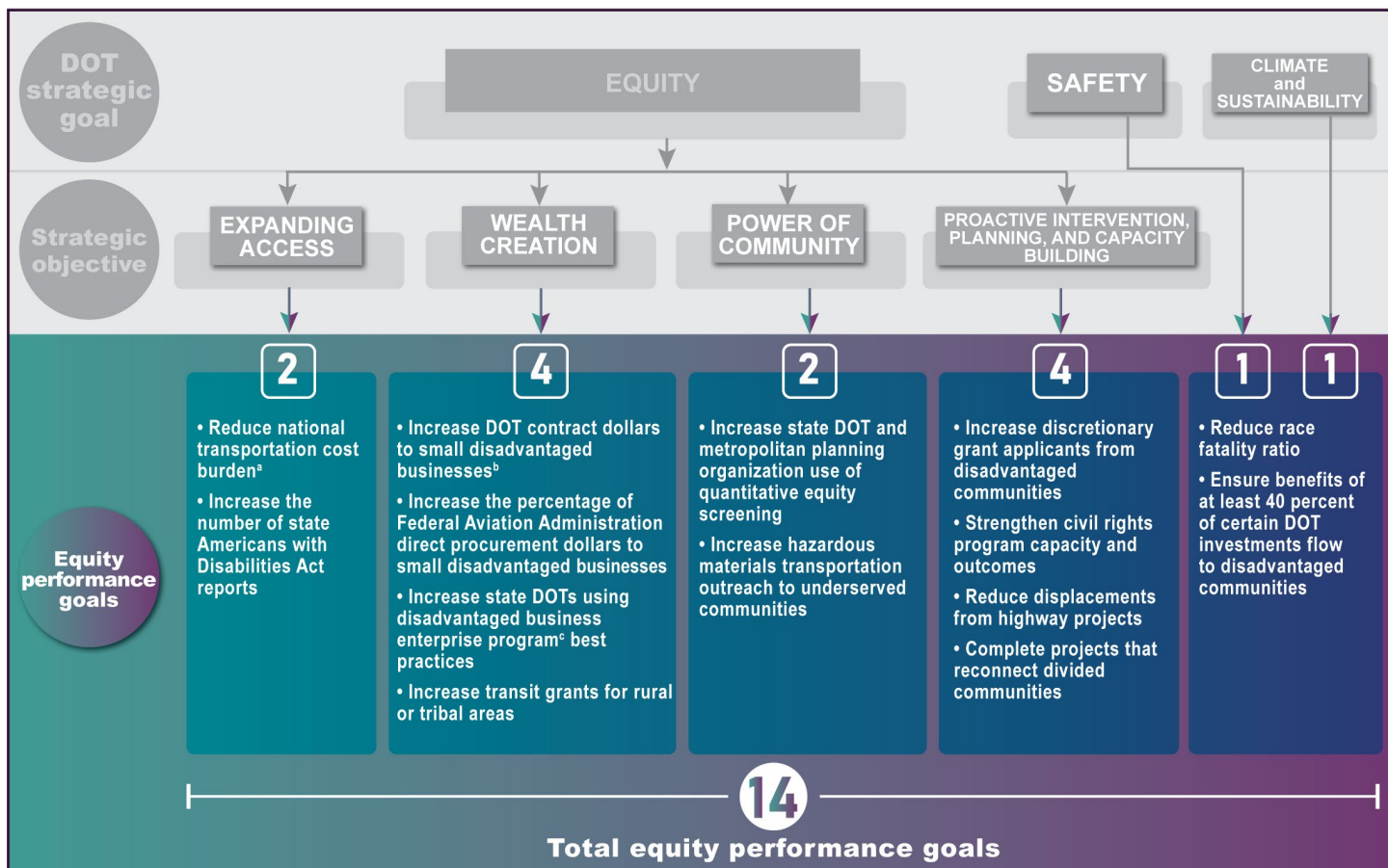
Source: GAO analysis of the Department of Transportation's (DOT) fiscal year 2025 performance plan. | GAO-24-105652

Note: In addition to the 12 performance goals under DOT's equity strategic goal, DOT determined two other performance goals as transportation equity-focused, including one goal under DOT's: (1) safety strategic goal and safe public strategic objective, and (2) climate and sustainability strategic goal and climate justice and environmental justice strategic objective.

DOT's equity performance goals relate to a variety of the department's programs and activities. Some, such as a goal to reduce the national transportation cost burden, are broadly related to DOT's efforts. Others, such as a goal to increase hazardous materials transportation outreach by the Pipeline and Hazardous Materials Safety Administration to underserved communities, are more focused on a single operating administration's efforts. Some of the performance goals relate to DOT's discretionary grant programs or awarding contract dollars to small disadvantaged businesses, while others relate to encouraging state DOTs to take certain actions in their planning efforts. See figure 2 for the topics of DOT's 14 equity performance goals under their corresponding strategic goal and objective. We refer to these performance goals by their topic in

the discussion below. See appendix I for DOT's equity performance goals written out in their entirety.

Figure 2: The Topics of DOT's 14 Equity Performance Goals as of Its Fiscal Year 2025 Annual Performance Plan



Source: GAO presentation of the Department of Transportation's (DOT) equity performance goal topics in its fiscal year 2025 annual performance plan. | GAO-24-105652

<sup>a</sup>Transportation cost burden is defined by DOT as when more than 15 percent of a household's annual income is spent on transportation and/or 45 percent or more of a household's income is spent on transportation and housing costs combined.

<sup>b</sup>For the purpose of DOT's direct contracting programs, small disadvantaged businesses are generally defined as for-profit small businesses that are at least 51 percent owned and operated by socially and economically disadvantaged individuals, such as minorities who have a net worth below a certain threshold. These programs are different from DOT's disadvantaged business enterprise program. See Department of Transportation, Office of the Secretary of Transportation, Office of Small and Disadvantaged Business Utilization, *Contracting with DOT: A Guide for Small Businesses* (Mar. 2021); Federal Aviation Administration, Acquisition Management Policy, appendix C (Apr. 2024).

<sup>c</sup>DOT's disadvantaged business enterprise (DBE) program is a nondiscrimination program that, in part, seeks to create a level playing field on which DBEs can compete fairly for contracts funded, in whole or in part, under DOT's highway, transit, and airport programs. DBEs are generally for-profit small business entities that are at least 51 percent owned by both socially and economically

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disadvantaged individuals, who also control management and daily business operations. See 49 C.F.R. §§ 23.1, 23.3, 26.1, 26.5.

An agency's annual performance plan is a forward-looking document that complements its strategic plan by translating the longer-term strategic goals and objectives in the strategic plan to programmatic performance goals. The annual performance plan communicates an agency's performance goals and describes the level of performance to be achieved during the current year in which the plan is submitted and the next fiscal year. The annual performance plan describes how the agency will achieve the goals, identifies priorities among the goals, and explains how the agency will monitor progress, among other things. An agency's annual performance report, on the other hand, is retrospective and provides information on its progress toward achieving the strategic objectives and performance goals described in its strategic plan and annual performance plan. The performance report is the primary document for detailed organizational performance reporting of results and progress, comparing actual performance achieved against goals and objectives established. To streamline agency planning and reporting of performance information, an agency generally consolidates its annual performance plan with its performance report.<sup>20</sup> As such, the performance report covers the fiscal year 2 years prior to the fiscal year covered in the performance plan. At the time of our review, DOT's fiscal year 2025 annual performance plan, published with its fiscal year 2023 annual performance report in March 2024, was the most current document.

DOT developed its first annual equity action plan in 2022 in response to Executive Order 13985. The equity action plan is designed to highlight work DOT will undertake through delivering programs that expand access and opportunity to all communities. DOT's 2023 update to the equity action plan highlights DOT's actions under four focus areas carried over from its original equity action plan, which are aligned with its equity strategic objectives: expanding access; wealth creation; power of community; and proactive intervention, planning, and capacity building. In 2023, DOT added institutionalizing equity as a fifth focus area to help embed equity as a core part of the department's mission and culture.

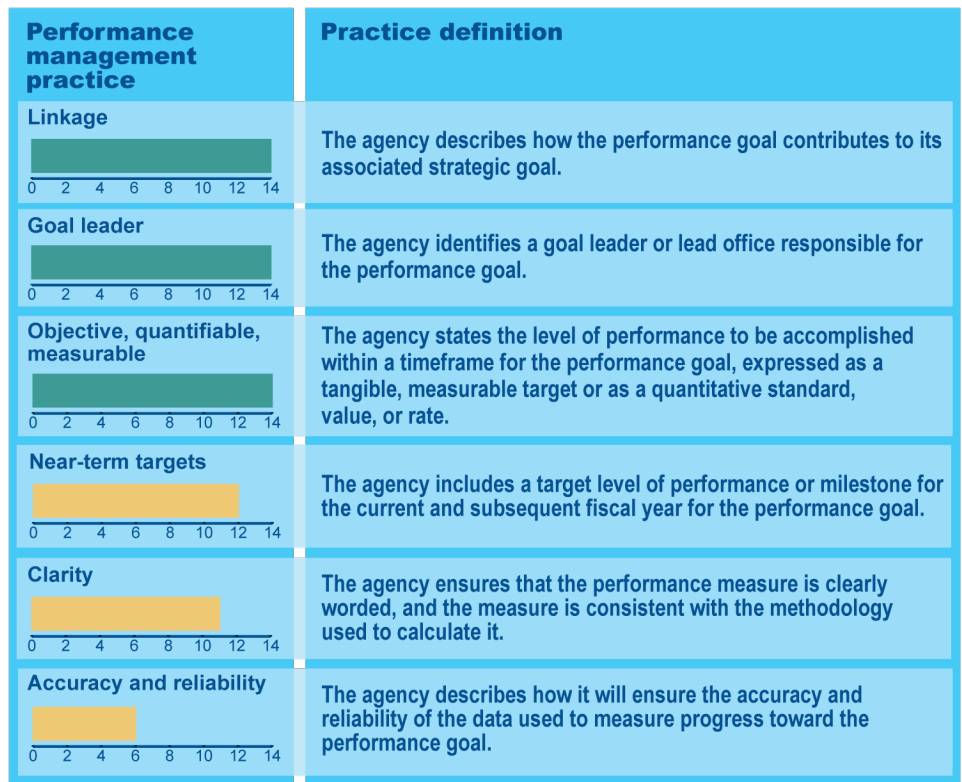
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<sup>20</sup>DOT's annual performance report is referred to by the department as its Performance Data Completeness and Reliability Report.

## DOT's Equity Performance Goals Are Mostly Consistent with Performance Management Practices, but Some Fall Short

We found that DOT's 14 equity performance goals are mostly consistent with our selected performance management practices. Specifically, DOT's equity performance goals are fully consistent with three of the six selected performance management practices. However, some of DOT's equity performance goals are not consistent with the other three selected performance management practices (see fig. 3). Ensuring that all of DOT's equity performance goals are consistent with our six selected performance management practices would help DOT better assess progress toward its equity strategic goal. Appendix II shows the results of our assessment of each of DOT's 14 equity performance goals against the six selected performance management practices.

**Figure 3: Consistency of DOT's 14 Equity Performance Goals with Selected Federal Performance Management Practices**



Source: GAO analysis of the Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 annual performance plan and performance management practices. | GAO-24-105652

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## DOT's Equity Performance Goals Are Fully Consistent with Three Selected Performance Management Practices

Our review of DOT's fiscal year 2025 performance plan found that its equity performance goals are fully consistent with the following performance management practices.

**Linkage.** Each of DOT's 14 equity performance goals demonstrates linkage. Specifically, DOT describes in the annual performance plan how each goal contributes to DOT's equity strategic goal.<sup>21</sup> For example, DOT explains in the performance plan that its goal to increase transit grants for rural or tribal areas will promote affordable, reliable, and accessible transit options. DOT states in the performance plan that providing grant funding to expand and improve public transportation in rural or tribal areas can help residents who rely on public transit to access destinations, such as jobs, medical services, and educational opportunities. DOT considers communities in rural and tribal areas to be underserved communities as defined in Executive Order 13985, which makes these areas a focus for its equity efforts.<sup>22</sup>

**Goal leader.** Each of DOT's equity performance goals is consistent with the performance management practice of goal leader—the agency identifies a goal leader or lead office responsible for the performance goal.<sup>23</sup> Specifically, DOT identified in the annual performance plan an office responsible for leading each equity performance goal. For example, the Pipeline and Hazardous Materials Safety Administration is listed as the office leading the goal to increase hazardous materials transportation outreach to underserved communities. As another example, the Office of the Assistant Secretary for Transportation Policy is listed as the lead office for the goal to ensure that the benefits of at least 40 percent of DOT investments in certain areas, such as clean transportation, flow to disadvantaged communities.

**Objective, quantifiable, and measurable.** Each of DOT's equity performance goals are consistent with the objective, quantifiable, and

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<sup>21</sup>DOT's equity strategic goal is: Reduce inequities across our transportation systems and the communities they affect. Support and engage people and communities to promote safe, affordable, accessible, and multimodal access to opportunities and services while reducing transportation-related disparities, adverse community impacts, and health effects.

<sup>22</sup>Department of Transportation, *Equity Action Plan* (Washington, D.C.: Jan. 2022).

<sup>23</sup>GPRAMA requires identifying a goal leader, and OMB guidance provides that the agency's annual performance plan identify a goal leader, lead office, or both. See 31 U.S.C. § 1115(b); OMB Circular A-11, §§ 200.17, 200.19(4.8).



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measurable performance management practice.<sup>24</sup> According to OMB guidance, a goal that is objective, quantifiable, and measurable states the level of performance to be accomplished within a time frame, expressed as a tangible, measurable target or as a quantitative standard, value, or rate. OMB guidance notes that one way for a performance goal to be consistent with this practice is to include the following components in the goal's language: (1) performance measure, (2) target, and (3) time frame.<sup>25</sup> See figure 4 for an example of a DOT equity performance goal that includes OMB's recommended components. Performance goals may also include qualitative milestones to explain the level of performance to be accomplished within a time frame instead of quantifiable targets.

**Figure 4: Example of a DOT Fiscal Year 2025 Equity Performance Goal that Includes the Office of Management and Budget's Recommended Components**



Source: GAO presentation of a Department of Transportation (DOT) equity performance goal in its fiscal year 2025 annual performance plan. Ripped paper image, 32 pixels/stockadobe.com (art). | GAO-24-105652

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<sup>24</sup>We found that the goal to strengthen civil rights program capacity and outcomes is written in an alternative form, which is permitted under GPRAMA when certain conditions are met. 31 U.S.C. § 1115(c). OMB guidance states that goals in an alternative form must be described in a way that makes it possible to discern if progress is being made toward the goal.

<sup>25</sup>OMB Circular A-11 uses the term performance indicator, but for the purposes of our report and consistency with prior GAO work, we use the term performance measure. OMB, *Circular No. A-11*, § 200.24 (Washington, D.C.: Aug. 2022). We consider the performance goal consistent with the practice of objective, quantifiable, and measurable, as long as the performance plan includes a performance measure, target, and time frame.

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## Some of DOT's Equity Performance Goals Are Not Consistent with the Other Three Selected Performance Management Practices

### Two of DOT's Performance Goals Do Not Include a Near-term Target

DOT included near-term targets, which are targets or milestones for the current and subsequent fiscal years, for 12 out of 14 equity performance goals in its fiscal year 2025 performance plan. The near-term targets identify the level of performance that DOT intends to achieve in fiscal years 2024 and 2025. For example, the goal to increase the percentage of direct procurement dollars awarded by the Federal Aviation Administration to small disadvantaged businesses has a target of 14 percent for fiscal year 2024, and 15 percent for fiscal year 2025.

However, DOT did not include a near-term target for fiscal year 2025 for two equity performance goals in its fiscal year 2025 performance plan.<sup>26</sup>

- **Increase the number of state Americans with Disabilities Act reports.** DOT noted in the 2025 annual performance plan that it did not include a near-term target for fiscal year 2025 because, at the time, the number of state Americans with Disabilities Act report submissions for fiscal year 2024 were not yet available. Once the data were available, DOT officials learned that all 50 states submitted Americans with Disabilities Act reports. As such, DOT officials said that they will reassess how to proceed with this performance goal given full state participation.
- **Ensure benefits of at least 40 percent of certain DOT investments flow to disadvantaged communities.** DOT officials said they consider 40 percent as the near-term target for this goal because Executive Order 14008 specified this percentage as part of a broader, federal government-wide goal on the same topic.<sup>27</sup> However, in the fiscal year 2025 annual performance plan, DOT did not specifically include 40 percent as the near-term target for fiscal year 2025.

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<sup>26</sup>In our review of DOT's fiscal year 2024 performance plan, we found that all 14 of DOT's equity performance goals are consistent with the near-term target practice.

<sup>27</sup>See Exec. Order 14008, *Tackling the Climate Crisis at Home and Abroad*, § 223(a) (Jan. 27, 2021) (establishing a goal that 40 percent of the overall benefits of certain federal investments flow to disadvantaged communities).

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According to DOT officials, this is because DOT had not yet completed a baseline evaluation to understand the level of its investments that benefit disadvantaged communities. In June 2024, DOT completed its baseline evaluation which showed that DOT exceeded its 40 percent target for fiscal years 2022 and 2023. According to DOT officials, DOT plans to use this data to set near-term targets for future years.

Near-term targets allow DOT officials, external stakeholders, and decision-makers to assess how DOT is meeting its interim targets as it works toward its equity performance goals.

### Three of DOT's Goals Are Inconsistent with the Practice of Clarity

Our analysis found that the measures for three of DOT's 14 equity performance goals are inconsistent with the performance management practice of clarity.<sup>28</sup> A performance measure aligns with the practice of clarity if it is clearly worded, and the measure is consistent with the methodology used to calculate it.<sup>29</sup> We found that three of DOT's equity measures are either inconsistent with their associated methodology or DOT did not include a clear methodology description in the fiscal year 2025 performance plan or 2023 performance report. See appendix III for additional details about the three performance measures we found are inconsistent with the practice of clarity, including an explanation of how the measure is not consistent with the methodology used to calculate it.

For example, DOT's measure and methodology are inconsistent for its equity performance goal to increase the percentage of first-time discretionary grant applicants from disadvantaged communities. DOT's measure for this performance goal is the percentage of first-time grant applicants from disadvantaged communities. DOT's methodology for this performance goal uses data starting in 2016 to identify first-time grant applicants from disadvantaged communities. Based on DOT's

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<sup>28</sup>Prior to the March 2024 release of DOT's fiscal year 2025 performance plan, we found that seven of DOT's 14 equity performance goals were not consistent with the practice of clarity based on information in its fiscal year 2024 performance plan. We met with officials from the lead offices of each equity performance goal and asked specific questions for the goals where we identified inconsistencies between the performance measure and the methodology used to calculate it. In DOT's fiscal year 2025 performance plan, we noted improvements in the clarity of the methodology descriptions for two equity performance goals we had previously identified as inconsistent based on the fiscal year 2024 performance plan: (1) increase state DOTs using disadvantaged business enterprise program best practices, and (2) increase state DOT and metropolitan planning organizations use of quantitative equity screening.

<sup>29</sup>[GAO-03-143](#).

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methodology, DOT would consider a 2024 grant applicant from a disadvantaged community who applied prior to 2016 to be a first-time applicant, even though they applied for a grant prior to 2016. While it is up to DOT to determine its methodology, DOT did not clearly explain its decision to use data starting in 2016 for its measure in its fiscal year 2025 performance plan or 2023 performance report. According to DOT officials, they decided to consider grant applicant data starting in 2016 because this was the first year of the prior surface transportation reauthorization.<sup>30</sup> However, due to this inconsistency, stakeholders may not have an accurate understanding of how DOT is defining first-time grant applicants from disadvantaged communities and DOT's progress in increasing the number of such applicants.

Using DOT's methodology, our analysis showed that DOT would have considered 130 applicants to one discretionary grant program as first-time applicants in 2022 or 2023 even though they previously applied.<sup>31</sup> Specifically, these 130 applicants applied between 2009 and 2015, and then again in either 2022 or 2023, but did not apply between 2016 and 2021. While we reviewed the data for one grant program, DOT stated that it is applying this performance goal's methodology across 69 applicable discretionary grant programs. Therefore, there may be additional applicants who applied prior to 2016 to other discretionary grant programs that DOT is considering as first-time applicants.

DOT officials told us there are several reasons why there may be what we characterized as inconsistencies between some of DOT's measures and their associated methodologies. First, DOT officials stated that DOT developed some of its equity performance goals before formulating the methodologies to measure progress. In addition, DOT officials noted that differences between the measure and methodology may be due to practical reasons, such as the unavailability of data. Further, DOT officials stated that it is difficult to amend the wording of the performance goals and any methodological issues are instead described in the performance report. However, we found that two out of three of the equity performance

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<sup>30</sup>The Fixing America's Surface Transportation Act is the last major surface transportation reauthorization act that provided funding for fiscal years 2016 through 2020. See Pub. L. No. 114-94, 129 Stat. 1312 (2015).

<sup>31</sup>This example is for illustrative purposes to demonstrate that there is an inconsistency between the goal's stated measure and the methodology that DOT uses to calculate the measure. However, we recognize that a new applicant must also be from a disadvantaged community to be counted.

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measures that are inconsistent with the practice of clarity did not have explanations of their methodologies in the performance report.

Performance measures that are inconsistent with the practice of clarity could be misleading or confusing to DOT, external stakeholders, and decision-makers. Performance goals that include measures with unclear methodologies reduce transparency and may limit progress toward DOT's equity strategic goal. We have previously reported that a measure that is not clearly worded can confuse users and cause managers or other stakeholders to think that performance was better or worse than in reality.<sup>32</sup>

Most of DOT's Performance Goals Do Not Have a Sufficient Accuracy and Reliability Description

Eight of DOT's 14 equity performance goals are inconsistent with the performance management practice of accuracy and reliability. A goal is consistent with this practice when the agency describes how it will ensure the accuracy and reliability of the data used to measure progress toward the performance goal.<sup>33</sup>

In DOT's fiscal year 2023 annual performance report, DOT did not fully describe the means used to verify and validate data for eight equity performance goals. For example, DOT did not describe the means used to verify and validate data to measure the performance goal to increase state DOT and metropolitan planning organizations' use of quantitative equity screening.<sup>34</sup> DOT officials stated that they do verify and validate the data. However, the fiscal year 2023 performance report does not describe the means DOT used to do so.

In another example, DOT does not describe the means used to verify and validate data for the goal to complete projects that reconnect divided

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<sup>32</sup>GAO-03-143.

<sup>33</sup>According to GPRAMA, the five components of accuracy and reliability that an agency should include in its description of the data used to measure progress toward its performance goals are: (1) the means used to verify and validate measured values, (2) the sources for the data, (3) the level of accuracy required for the intended use of the data, (4) any limitations to the data at the required level of accuracy, and (5) how the agency has compensated for such limitations if needed to reach the required level of accuracy. 31 U.S.C. § 1115(b)(8), 1116(c)(6). For the purposes of our review, we relied on descriptions in the *Performance Data Completeness and Reliability Report*, which is DOT's fiscal year 2023 annual performance report.

<sup>34</sup>According to DOT, equity screening involves determining and communicating equity priorities through meaningful public involvement and data-driven analysis, measuring equity impacts, and considering those impacts throughout all stages of the transportation planning process.

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communities. DOT notes in the performance report that program oversight verifies and validates data such as the number of completed projects, applicants, awards, and completed environmental review processes, but does not detail how the program oversight verifies and validates the data. See appendix IV for additional details about the eight equity performance goals that do not include a sufficient accuracy and reliability description.

Some examples of how DOT described how it verifies and validates data for the six equity performance goals that are consistent with this practice include annual reviews of databases, consistent monitoring of databases, and reconciling data against other documentation. For example, DOT states in the performance report description how it will verify and validate the data used to measure progress toward the equity performance goal to increase the percentage of total direct procurement contract dollars awarded by the Federal Aviation Administration to small disadvantaged businesses. DOT states that the Federal Aviation Administration conducts monthly reporting, validates direct procurement award information in its information management database, and performs annual reviews to ensure award information is consistent, accurate, and reportable.

DOT officials said they review the descriptions in the performance report with the Bureau of Transportation Statistics to ensure they include comprehensive information about accuracy and reliability, and that DOT considers this review sufficient to meet this practice. However, we identified eight goals that did not include such information.

Without a sufficient description of accuracy and reliability in the performance report, DOT officials, external stakeholders, and decision-makers who use the performance information may not know if these data are useful for their needs. Sufficient accuracy and reliability descriptions also improve transparency by identifying any reliability issues, and the efforts DOT is making to overcome these issues. We have previously reported that problems related to data reliability may affect conclusions about the extent to which agencies have achieved performance goals.<sup>35</sup> Without understanding what efforts DOT has taken to validate the data being used, it is difficult to assess the extent to which DOT is accurately reporting on progress toward meeting the performance goal.

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<sup>35</sup>[GAO-03-143](#).

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## DOT Is Taking Steps to Assess and Use Information to Manage Its Equity Efforts

DOT is taking steps to assess and use information to manage its equity efforts. These steps, which are ongoing, include assessing the sufficiency of its current performance information and using early information from its performance reviews to guide some programmatic decision-making. In prior work, we identified key practices that can help federal agencies assess, build, and use evidence to manage the organization's performance in line with federal requirements and guidance.<sup>36</sup> Given the recency of DOT's equity strategic goal—which DOT established in fiscal year 2022—we did not conduct a full evaluation of its efforts in this area. We were able to identify examples of actions that are in line with some of these key practices.

For the purposes of federal evidence-building and performance management activities, evidence is the available body of facts or information indicating whether a belief or proposition is true or valid. It consists of quantitative or qualitative information derived from a variety of sources, including performance information, program evaluations, statistical data, and other research and analysis.<sup>37</sup> Evidence helps provide insights about federal agencies, programs, and activities. It can help federal decision-makers, stakeholders, and the public better understand the issues the federal government seeks to address, and how well federal programs and activities are doing at addressing those issues.<sup>38</sup>

**Assessing information.** Our prior work states that key practices for assessing information include assessing the sufficiency of existing evidence, identifying and prioritizing evidence needs, and generating new evidence.<sup>39</sup>

According to DOT officials, DOT has been focused on assessing the sufficiency of its existing information in order to identify and generate

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<sup>36</sup>[GAO-23-105460](#). In this July 2023 guide, we developed 13 key practices by reviewing (1) federal laws and guidance related to evidence-building and performance-management activities and (2) 200 related reports we issued since 1996. We refined the key practices, as appropriate, based on input from cognizant officials at 24 major federal agencies and OMB staff.

<sup>37</sup>See Pub. L. No. 115-435, § 101(a)(1) 132 Stat. 5529, 5530 (2019) (codified at 5 U.S.C. § 311(4) (incorporating the definition of “evidence” under 44 U.S.C. § 3561); OMB Circular A-11, § 200.24 (defining “evidence” for the purpose of federal performance management).

<sup>38</sup>[GAO-23-105460](#).

<sup>39</sup>[GAO-23-105460](#).

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needed evidence as it relates to measuring its equity performance goals. DOT officials said that the department established many of its equity performance goals prior to calculating their baseline measures and developing their methodologies. As such, in some instances DOT assessed the information available to measure a performance goal it had already set, and at times, developed methodologies with available information. For example, as described previously, DOT decided to use data starting from 2016 to determine the population of first-time discretionary grant applicants from disadvantaged communities. According to DOT officials, during our review, DOT was actively assessing available data and calculating the baselines for the goal to ensure benefits of at least 40 percent of certain DOT investments flow to disadvantaged communities. In June 2024, DOT completed its baseline evaluation for this performance goal which showed that DOT exceeded its 40 percent target for fiscal years 2022 and 2023.

According to DOT officials, DOT's Office of the Secretary of Transportation collaborated with the operating administrations and other stakeholders to develop its annual evaluation plan to identify priority evidence-building activities. DOT's fiscal year 2025 evaluation plan describes three priority efforts to generate new equity information:<sup>40</sup>

- **Equity performance goal: Increase hazardous materials transportation outreach to underserved communities.** The Pipeline and Hazardous Materials Safety Administration will evaluate the degree to which outreach is effective at increasing the equitable allocation of Hazardous Materials Emergency Preparedness Grants to underserved communities.
- **Equity performance goal: Reduce the national transportation cost burden.** The Bureau of Transportation Statistics initiated work to improve estimating the cost burden for transportation. According to DOT officials, DOT analyzed the equity performance goal's 2022 baseline data and determined that new data collection methods might be necessary to more accurately identify cost burden factors.
- **Equity strategic objectives: Expanding access and proactive intervention, planning and capacity building.** The Federal Transit Administration started a new data effort in fiscal year 2024 to collect geospatial location data for fixed-route and on-demand services from transit agencies. According to DOT officials, this new data will help the

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<sup>40</sup>Department of Transportation, *FY 2025 Evaluation Plan* (Washington, D.C.: Mar. 11, 2024).



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Federal Transit Administration measure the extent to which disadvantaged populations have access to transportation options.

According to OMB guidance, a learning agenda is a tool that can help agencies identify and prioritize new evidence needs. A learning agenda is a long-term, multi-year plan that defines and prioritizes relevant questions and identifies strategies for building evidence to answer them.<sup>41</sup> The Evidence Act requires agencies to develop a learning agenda every 4 years as part of their strategic plan.<sup>42</sup> According to DOT officials, DOT is in the process of developing a mid-cycle update to its learning agenda which will identify and prioritize new information needs and a plan for generating that new information. As part of this process, DOT published a request for information in February 2024 that identified equity as a priority area for questions. It also solicited input from interested parties, such as external industry stakeholders, on what new research or data priorities DOT should consider.<sup>43</sup> DOT officials also held an internal event with evaluation and research professionals from across the department to get their contributions for the learning agenda update.

**Using information.** According to our prior work, an organization can use information to learn by assessing progress toward achieving its goals. It can then apply that learning to programmatic decision-making such as to identify and take corrective actions when progress is insufficient.<sup>44</sup>

Our prior work states that one approach for using information to learn is to conduct performance reviews in which senior leadership and responsible parties evaluate relevant performance information to assess progress toward goals.<sup>45</sup> According to DOT officials, DOT's Office of the Secretary of Transportation conducts required internal performance management reviews with its operating administrations as part of its process to manage department-wide performance goals. DOT meets quarterly with each operating administration and reviews each performance goal the

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<sup>41</sup>Office of Management and Budget, *Phase 1 Implementation of the Foundations for Evidence-Based Policymaking Act of 2018: Learning Agendas, Personnel, and Planning Guidance*, M-19-23 (Washington, D.C.: July 10, 2019).

<sup>42</sup>See 5 U.S.C. § 312. The first learning agenda was required in fiscal year 2022.

<sup>43</sup>Office of the Chief Financial Officer and Assistant Secretary for Budget and Programs; U.S. Department of Transportation Learning Agenda Supplement: Fiscal Years 2024-2026, 89 Fed. Reg. 10155 (Feb. 13, 2024).

<sup>44</sup>[GAO-23-105460](#).

<sup>45</sup>[GAO-23-105460](#).

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operating administration is responsible for. As part of this process, DOT reviews collected performance information and progress made toward its targets and determines if any adjustments are needed to the performance goal. DOT officials said that at least one of the quarterly reviews with each operating administration is conducted with the Deputy Secretary of Transportation present, to ensure high visibility with DOT leadership and a better understanding of each goal's progress. Additionally, DOT conducts a required annual strategic review of progress toward its strategic objectives. DOT officials described using performance information obtained during quarterly and annual reviews to help inform decision-making, including budget formulation; near-term agency actions; and preparing the annual performance plan and performance report.

According to our prior work, applying information to decision-making can include a variety of actions, such as identifying priorities, developing strategies, and adopting new approaches or changing existing processes to achieve better results.<sup>46</sup> DOT officials shared that they use the information collected related to their equity performance goals to inform a range of decisions. For example:

- **Completing projects that reconnect divided communities.** According to DOT officials, they are collecting baseline information from grants awarded through the Reconnecting Communities Pilot program. DOT officials said they are refining the evaluation rubric used to award grants for the pilot program to more clearly align with its equity goals, simplify the criteria for analysis, and streamline the review process.
- **Increasing the percentage of Federal Aviation Administration direct procurement dollars to small disadvantaged businesses.** According to Federal Aviation Administration officials, even though the Federal Aviation Administration is meeting its target, it wants to look at the number of small disadvantaged business vendors competing for the contracts. Federal Aviation Administration officials said that they would like to review the contracting process to determine whether it needs restructuring to still meet its mission, and also increase the number of small disadvantaged business vendors in order to promote more competition.
- **Increasing transit grants for rural and tribal areas.** According to Federal Transit Administration officials, rural and tribal information collected for the equity performance goal helps inform the Federal

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<sup>46</sup>[GAO-23-105460](#).

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Transit Administration's outreach efforts to increase the number of rural and tribal grant applicants. This information also helps improve technical assistance and training provided through the National Rural Transit Assistance Program. The Federal Transit Administration also offers technical assistance to unsuccessful rural and tribal grant applicants by providing feedback on their applications so they can be more competitive the following year. Federal Transit Administration officials said this individualized technical assistance is tracked and allows them to see if the rural and tribal applicants were subsequently successful in obtaining a grant.

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## Conclusions

Americans rely on the nation's transportation system to access opportunities and services, such as jobs and health care. Recognizing the challenges some Americans face accessing transportation, DOT established a new strategic goal in 2022 to reduce inequities across the transportation system and developed 14 equity performance goals to help measure progress. These performance goals are mostly consistent with our selected performance management practices. For example, DOT identified a goal leader or lead office responsible for achieving each performance goal. However, ensuring that each of these performance goals is consistent with all six of our selected performance management practices would help strengthen DOT's ability to assess progress of its equity performance goals over time. It would also help DOT use this information for management decisions about its ongoing equity efforts to reduce transportation inequities as intended. Further, ensuring each of the performance goals has a target or milestone, clear methodologies and measures, and a sufficient description of the data's accuracy and reliability, would help DOT improve transparency for its equity efforts, particularly for external stakeholders and decision-makers.

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## Recommendations for Executive Action

We are making the following three recommendations to DOT:

The Secretary of Transportation should ensure each equity performance goal has a target or target milestone for the current and subsequent year in DOT's annual performance plan. (Recommendation 1)

The Secretary of Transportation should clarify the performance measures or associated methodology descriptions for the equity performance goals we identified as being inconsistent with the practice of clarity. (Recommendation 2)

The Secretary of Transportation should revise the descriptions of accuracy and reliability in DOT's annual performance report for the equity

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performance goals we identified as not having a sufficient description.  
(Recommendation 3)

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## Agency Comments

We provided a draft of this report to DOT for review and comment. In its comments, reproduced in appendix V, DOT concurred with our recommendations. DOT also provided technical comments, which we incorporated as appropriate.

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

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or [repkoe@gao.gov](mailto:repkoe@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 VI.



Elizabeth Repko  
Director, Physical Infrastructure

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*List of Committees*

The Honorable Brian Schatz  
Chair  
Subcommittee on Transportation, Housing and Urban Development, and  
Related Agencies  
Committee on Appropriations  
United States Senate

The Honorable Cindy Hyde-Smith  
Ranking Member  
Subcommittee on Transportation, Housing and Urban Development, and  
Related Agencies  
Committee on Appropriations  
United States Senate

The Honorable Steve Womack  
Chairman  
Subcommittee on Transportation, and Housing and Urban Development,  
and Related Agencies  
Committee on Appropriations  
House of Representatives

The Honorable Mike Quigley  
Ranking Member  
Subcommittee on Transportation, and Housing and Urban Development,  
and Related Agencies  
Committee on Appropriations  
House of Representatives

# Appendix I: The Department of Transportation's Equity Performance Goals, Fiscal Year 2025

**Table 2: DOT's Equity Performance Goals as of Its Fiscal Year 2025 Annual Performance Plan**

Equity performance goal topic	Equity performance goal	Equity strategic objective
Reduce national transportation cost burden <sup>a</sup>	Reduce national transportation cost burden by 5 percent, including transportation travel cost as a percent of income, by 2030.	Expanding access
Increase the number of state Americans with Disabilities Act reports	Increase the number of state Americans with Disabilities Act report submissions in eCivil Rights Connect. <sup>b</sup>	Expanding access
Increase DOT contract dollars to small disadvantaged businesses <sup>c</sup>	Increase DOT direct contract dollars to small disadvantaged businesses from 18.2 percent in fiscal year 2021 to 22 percent by fiscal year 2026.	Wealth creation
Increase the percentage of Federal Aviation Administration direct procurement dollars to small disadvantaged businesses	Increase the percentage of total Federal Aviation Administration direct procurement dollars awarded to small disadvantaged businesses.	Wealth creation
Increase state DOTs using disadvantaged business enterprise program <sup>d</sup> best practices	Increase number of state DOTs adopting and implementing identified best practices when administering the disadvantaged business enterprise program on design-build projects. <sup>e</sup>	Wealth creation
Increase transit grants for rural or tribal areas	Increase the total federal transit grant dollars announced or allocated for rural or tribal areas.	Wealth creation
Increase state DOT and metropolitan planning organization use of quantitative equity screening <sup>f</sup>	All 50 state DOTs and top 100 metropolitan planning organizations adopt a quantitative equity screening component to their statewide/transportation improvement program <sup>g</sup> development processes by 2030.	Power of community
Increase hazardous materials transportation outreach to underserved communities	Increase the percentage of community outreach activities directed toward underserved communities <sup>h</sup> to increase hazardous materials transportation awareness, preparedness, and response.	Power of community
Increase discretionary grant applicants from disadvantaged communities	By 2025, increase by 5 percent the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before.	Proactive intervention, planning, and capacity building
Strengthen civil rights program capacity and outcomes	Utilize the Infrastructure Investment and Jobs Act (IIJA) <sup>i</sup> to assess and strengthen civil rights program capacity, coordination, and outcomes, including fully implementing DOT's new Title VI order, <sup>j</sup> phased to meet IIJA implementation timelines.	Proactive intervention, planning, and capacity building
Reduce displacements from highway projects	Reduce the number of displacements resulting from federal-aid highway projects.	Proactive intervention, planning, and capacity building
Complete projects that reconnect divided communities	Complete three projects that reconnect communities that were divided by transportation corridors.	Proactive intervention, planning, and capacity building
Reduce race fatality ratio	Reduce the race fatality ratio by population. <sup>k</sup>	N/A

**Appendix I: The Department of  
Transportation's Equity Performance Goals,  
Fiscal Year 2025**

<b>Equity performance goal topic</b>	<b>Equity performance goal</b>	<b>Equity strategic objective</b>
Ensure benefits of at least 40 percent of certain DOT investments flow to disadvantaged communities	Ensure that the benefits of at least 40 percent of DOT investment in the areas of clean energy and energy efficiency, clean transportation, and the remediation and reduction of legacy pollution flow to disadvantaged communities. <sup>1</sup>	N/A

Source: GAO presentation of the Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 annual performance plan. | GAO-24-105652

Note: N/A – In addition to the 12 performance goals under DOT's equity strategic goal, DOT determined two other performance goals as transportation equity-focused, including one goal under DOT's: (1) safety strategic goal and safe public strategic objective, and (2) climate and sustainability strategic goal and climate justice and environmental justice strategic objective.

<sup>a</sup>Transportation cost burden is defined by DOT as when more than 15 percent of a household's annual income is spent on transportation and/or 45 percent or more of a household's income is spent on transportation and housing costs combined.

<sup>b</sup>Civil Rights Connect is a centralized data reporting system for state DOT and Federal Highway Administration division offices to upload information.

<sup>c</sup>For the purpose of DOT's direct contracting programs, small disadvantaged businesses are generally defined as for-profit small businesses that are at least 51 percent owned and operated by socially and economically disadvantaged individuals, such as minorities who have a net worth below a certain threshold. These programs are different from DOT's disadvantaged business enterprise program. See Department of Transportation, Office of the Secretary of Transportation, Office of Small and Disadvantaged Business Utilization, *Contracting with DOT: A Guide for Small Businesses* (Mar. 2021); Federal Aviation Administration, Acquisition Management Policy, appendix C (Apr. 2024).

<sup>d</sup>DOT's disadvantaged business enterprise (DBE) program is a nondiscrimination program that seeks, in part, to create a level playing field on which DBEs can compete fairly for contracts funded, in whole or in part, under DOT's highway, transit, and airport programs. DBEs are generally for-profit small business entities that are at least 51 percent owned by both socially and economically disadvantaged individuals, who also control management and daily business operations. See 49 C.F.R. §§ 23.1, 23.3, 26.1, 26.5.

<sup>e</sup>Design-build is a project delivery method that combines two separate services into a single contract, such as design services with construction services.

<sup>f</sup>According to DOT, equity screening involves determining and communicating equity priorities through meaningful public involvement and data-driven analysis, measuring equity impacts, and considering those impacts throughout all stages of the transportation planning process.

<sup>g</sup>State DOTs and metropolitan planning organizations are required to develop statewide transportation improvement programs and transportation improvement programs, respectively, that cover a 4-year period. These programs generally are prioritized lists of transportation projects proposed for certain Federal Highway Administration- or Federal Transit Administration-administered funds and any regionally significant projects. See 23 U.S.C. §§ 134, 135; 23 C.F.R. pt. 450.

<sup>h</sup>Under Executive Order 13985, underserved communities are populations sharing a particular characteristic, as well as geographic communities, that have been systematically denied a full opportunity to participate in aspects of economic, social, and civil life, and includes Black, Latino, and Indigenous and Native American persons, Asian Americans and Pacific Islanders, and other persons of color; members of religious minorities; lesbian, gay, bisexual, transgender, and queer persons; persons with disabilities; persons who live in rural areas; and persons otherwise adversely affected by persistent poverty or inequality. See Exec. Order 13985, Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (Jan. 20, 2021).

<sup>i</sup>The IIJA is the Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021).

<sup>j</sup>Title VI of the Civil Rights Act of 1964 prohibits any person, on the ground of race, color, or national origin, from being excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. National origin includes limited English proficiency. DOT and its operating administrations implement Title VI and its corresponding regulations for DOT's financial assistance. See 42 U.S.C. § 2000d et seq.; 49 C.F.R. pt. 21; Exec. Order 13166, Improving Access to Services for Persons With Limited English Proficiency (Aug. 11, 2000); DOT 1000.12C, The U.S. Department of Transportation Title VI Program (June 11, 2021).

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**Appendix I: The Department of  
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Fiscal Year 2025**

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<sup>k</sup>Fatalities for this goal are related to roadway crashes.

<sup>l</sup>This performance goal is helping DOT meet the goals of the Justice40 Initiative. Justice40 is a government-wide initiative that seeks to deliver 40 percent of the overall benefits from covered federal programs, in areas such as pollution reduction, clean energy, and affordable and sustainable housing, flow to disadvantaged communities. See Exec. Order 14008, Tackling the Climate Crisis at Home and Abroad (Jan. 27, 2021).



# Appendix II: Assessment of the Department of Transportation's Equity Performance Goals

Figure 5: GAO Assessment of DOT's Equity Performance Goals against Selected Performance Management Practices

Equity performance goal	Linkage 	Goal leader 	Objective, quantifiable, measurable 	Near-term targets 	Clarity 	Accuracy and reliability 
Reduce national transportation cost burden by 5 percent, including transportation travel cost as a percent of income, by 2030.						
Increase the number of state Americans with Disabilities Act report submissions in eCivil Rights Connect						
Increase DOT direct contract dollars to small disadvantaged businesses <sup>a</sup> from 18.2 percent in fiscal year 2021 to 22 percent by fiscal year 2026.						
Increase the percentage of total Federal Aviation Administration direct procurement dollars awarded to small disadvantaged businesses.						
Increase number of state departments of transportation adopting and implementing identified best practices when administering the disadvantaged business enterprise program <sup>b</sup> on design-build projects.						
Increase the total federal transit grant dollars announced or allocated for rural or tribal areas.						
All 50 state departments of transportation and top 100 metropolitan planning organizations adopt a quantitative equity screening component to their statewide/transportation improvement program development processes by 2030.						
Increase the percentage of community outreach activities directed toward underserved communities to increase hazmat transportation awareness, preparedness, and response.						
By 2025, increase by 5 percent the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before.						
Utilize the Infrastructure Investment and Jobs Act (IIJA) to assess and strengthen civil rights program capacity, coordination, and outcomes, including fully implementing DOT's new Title VI order <sup>c</sup> , phased to meet IIJA implementation timelines.						
Reduce the number of displacements resulting from federal-aid highway projects.						
Complete three projects that reconnect communities that were divided by transportation corridors.						
Reduce the race fatality ratio by population.						
Ensure that the benefits of at least 40 percent of DOT investment in the areas of clean energy and energy efficiency, clean transportation, and the remediation and reduction of legacy pollution flow to disadvantaged communities.						

Consistent with performance management practice      Inconsistent with performance management practice

Source: GAO icons and analysis of Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 annual performance plan. | GAO-24-105652

<sup>a</sup>For the purpose of DOT's direct contracting programs, small disadvantaged businesses are generally defined as for-profit small businesses that are at least 51 percent owned and operated by socially and economically disadvantaged individuals, such as minorities who have a net worth below a certain threshold. These programs are different from DOT's disadvantaged business enterprise

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**Appendix II: Assessment of the Department of  
Transportation's Equity Performance Goals**

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program. See Department of Transportation, Office of the Secretary of Transportation, Office of Small and Disadvantaged Business Utilization, *Contracting with DOT: A Guide for Small Businesses* (Mar. 2021); Federal Aviation Administration, Acquisition Management Policy, appendix C (Apr. 2024).

<sup>b</sup>DOT's disadvantaged business enterprise (DBE) program is a nondiscrimination program that seeks, in part, to create a level playing field on which DBEs can compete fairly for contracts funded, in whole or in part, under DOT's highway, transit, and airport programs. DBEs are generally for-profit small business entities that are at least 51 percent owned by both socially and economically disadvantaged individuals, who also control management and daily business operations. See 49 C.F.R. §§ 23.1, 23.3, 26.1, 26.5.

<sup>c</sup>Title VI of the Civil Rights Act of 1964 prohibits any person, on the ground of race, color, or national origin, from being excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. National origin includes limited English proficiency. DOT and its operating administrations implement Title VI and its corresponding regulations for DOT's financial assistance. See 42 U.S.C. § 2000d et seq.; 49 C.F.R. pt. 21; Exec. Order 13166, Improving Access to Services for Persons With Limited English Proficiency (Aug. 11, 2000); DOT 1000.12C, The U.S. Department of Transportation Title VI Program (June 11, 2021).

# Appendix III: The Department of Transportation's Equity Performance Goals with Clarity Issues

Our analysis found that the measures for three of the Department of Transportation's (DOT) 14 equity performance goals are inconsistent with the performance management practice of clarity. A performance measure aligns with the practice of clarity if it is clearly worded, and the measure is consistent with the methodology used to calculate it. DOT's three equity measures that we found do not have clarity are either inconsistent with their associated methodology or DOT does not include a clear methodology description in its performance management documents. Table 3 includes additional details about DOT's three equity performance goals that GAO found to be inconsistent with the practice of clarity.

**Table 3: DOT's Equity Performance Goals and Measures with Clarity Issues**

Equity-focused performance goal	Performance measure	GAO analysis of performance measure and goal methodology
Reduce national transportation cost burden by 5 percent, including transportation travel cost as a percent of income, by 2030.	Percentage of U.S. population that is transportation cost burdened	The methodology for this performance measure is unclear because the description of the methodology is different in various DOT documents. In the 2023 annual performance report, the methodology for this measure is the percentage of people who live in census tracts where the average household spends more than 15 percent of their annual income on transportation and/or 45 percent or more of their income on transportation and housing costs combined. In a supplemental fact sheet for the equity performance goal, DOT stated that the measure used median household income spent on transportation instead of average household income. Additionally, the performance measure stated by DOT is not consistent with the methodology. The measure is the percentage of the U.S. population that is transportation cost burdened, but the methodology is the percentage of the population that lives in census tracts that are on average cost burdened.
By 2025, increase by 5 percent the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before.	Percentage of first-time DOT discretionary grant applicants from disadvantaged communities	This performance measure is inconsistent with its methodology because the measure states that it is about first-time grant applicants. However, DOT calculates the measure using data starting in 2016. Given this methodology, DOT would consider a grant applicant in 2024, who also applied for potentially numerous grants prior to 2016, as a first-time applicant. DOT does not clearly explain its decision to use data starting in 2016 in descriptions of the performance goal in its 2025 annual performance plan or 2023 performance report.
Utilize the Infrastructure Investment and Jobs Act (IIJA) to assess and strengthen civil rights program capacity, coordination, and outcomes, including fully implementing DOT's new Title VI order, <sup>a</sup> phased to meet IIJA implementation timelines.	*	This performance goal does not have a clear measure or methodology listed. GAO found that this performance goal is written in an alternative form, which is permitted by statute and acceptable by Office of Management and Budget guidance when certain conditions are met. However, DOT listed numerous activities as the performance goal's milestones for the lead office to implement. The number and types of activities makes it unclear how DOT will determine whether the target has been met.

Source: GAO analysis of the Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 annual performance plan. | GAO-24-105652

\*DOT officials said this is a qualitative performance measure because of the new nature of this program and a performance measure was not identified.

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**Appendix III: The Department of  
Transportation's Equity Performance Goals  
with Clarity Issues**

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<sup>a</sup>Title VI of the Civil Rights Act of 1964 prohibits any person, on the ground of race, color, or national origin, from being excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. National origin includes limited English proficiency. DOT and its operating administrations implement Title VI and its corresponding regulations for DOT's financial assistance. See 42 U.S.C. § 2000d et seq.; 49 C.F.R. pt. 21; Exec. Order 13166, Improving Access to Services for Persons With Limited English Proficiency (Aug. 11, 2000); DOT 1000.12C, The U.S. Department of Transportation Title VI Program (June 11, 2021).

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# Appendix IV: The Department of Transportation's Equity Performance Goals with Accuracy and Reliability Issues

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A goal is consistent with the federal performance management practice of accuracy and reliability when the agency describes how it will ensure the accuracy and reliability of the data used to measure progress toward each performance goal.<sup>1</sup>

We found that six of the Department of Transportation's (DOT) 14 equity performance goals are consistent with the accuracy and reliability practice. For example, for the equity performance goal to increase the percentage of Federal Aviation Administration direct procurement dollars to small disadvantaged businesses, DOT describes how it will ensure the accuracy and reliability of the data used to measure the goal's progress. DOT states in the performance report description that the Federal Aviation Administration conducts monthly reporting and validates direct procurement award information in its information management database and performs annual reviews to ensure award information is consistent, accurate, and reportable.

In contrast, we found that eight of DOT's 14 equity performance goals are inconsistent with the performance management practice of accuracy and reliability. These goals are inconsistent with the practice because DOT does not describe the means used to verify and validate the data. Some examples of how DOT could verify and validate data include annual reviews of databases, consistent monitoring of databases, and reconciling data against other documentation.

Table 4 shows the eight equity performance goals that are inconsistent with the practice and our analysis of DOT's descriptions about how it ensures the accuracy and reliability of its data.

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<sup>1</sup>According to the Government Performance and Results Modernization Act of 2010 (GPRAMA), the five components of accuracy and reliability that an agency should include in its description of the data used to measure progress toward its performance goals are: (1) the means used to verify and validate measured values, (2) the sources for the data, (3) the level of accuracy required for the intended use of the data, (4) any limitations to the data at the required level of accuracy, and (5) how the agency has compensated for such limitations if needed to reach the required level of accuracy. 31 U.S.C. §§ 1115(b)(8), 1116(c)(6). For the purposes of our review, we relied on the descriptions found in the Performance Data Completeness and Reliability Report, which is DOT's fiscal year 2023 annual performance report.

**Appendix IV: The Department of  
Transportation's Equity Performance Goals  
with Accuracy and Reliability Issues**

**Table 4: DOT's Equity Performance Goals with Accuracy and Reliability Issues**

<b>Equity performance goal</b>	<b>GAO analysis of accuracy and reliability</b>
Reduce national transportation cost burden by 5 percent, including transportation travel cost as a percent of income, by 2030.	The equity performance goal's performance report description does not include how DOT verifies and validates the data. The section on verification and validation provides a brief history of how DOT uses the data and notes that further refinement of the methodology is ongoing.
Increase the number of state Americans with Disabilities Act report submissions in eCivil Rights Connect.	The equity performance goal's performance report description states that the database has been in place for 4 years, and other Federal Highway Administration program areas have reliably used the database to collect data. However, DOT does not provide details on how it ensures the data from the database are verified and validated.
All 50 state departments of transportation and top 100 metropolitan planning organizations adopt a quantitative equity screening component to their statewide/transportation improvement program development processes by 2030.	The equity performance goal's performance report description does not include information on the means DOT used to verify and validate its data. DOT officials stated that they do verify and validate the data. However, the performance report does not describe the means DOT used to do so.
By 2025, increase by 5 percent the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before.	The equity performance goal's performance report description covers details about parent/child grantees (which is a subset of grant applications) but does not describe how DOT verifies and validates the data for this goal.
Utilize the Infrastructure Investment and Jobs Act (IIJA) to assess and strengthen civil rights program capacity, coordination, and outcomes, including fully implementing DOT's new Title VI order, <sup>a</sup> phased to meet IIJA implementation timelines.	The equity performance goal's performance report description states that the lead office works with the human resources department to validate workforce data, but there are limited details about how this verification and validation is ensured. Additionally, DOT notes that strategic planning is underway to develop standard operating procedures and tracking for coordination between the lead office and operating administrations' civil rights program offices.
Complete three projects that reconnect communities that were divided by transportation corridors.	The equity performance goal's performance report description states that program oversight provides data verification and validation but does not give any additional details of how this oversight verifies and validates the data.
Reduce the race fatality ratio by population.	The equity performance goal's performance report description states that the quality of the data varies greatly because the data are incomplete, vary by state, and are used at different levels. Additionally, the description does not include how DOT ensures that the data are verified and validated.
Ensure that the benefits of at least 40 percent of DOT investment in the areas of clean energy and energy efficiency, clean transportation, and the remediation and reduction of legacy pollution flow to disadvantaged communities.	The equity performance goal's performance report description states that the baseline is still in development, and no additional information is provided on how the data for this goal are verified and validated.

Source: GAO analysis of the Department of Transportation's (DOT) equity performance goals in its fiscal year 2025 annual performance plan and 2023 performance report. | GAO-24-105652

Note: According to the Government Performance and Results Modernization Act of 2010 (GPRAMA), the five components of accuracy and reliability that an agency should include in its description of the data used to measure progress toward its performance goals are: (1) the means used to verify and validate measured values, (2) the sources for the data, (3) the level of accuracy required for the intended use of the data, (4) any limitations to the data at the required level of accuracy, and (5) how the agency has compensated for such limitations if needed to reach the required level of accuracy. 31 U.S.C. §§ 1115(b)(8), 1116(c)(6). For the purposes of our review, we relied on the descriptions found in DOT's fiscal year 2023 annual performance report.

<sup>a</sup>Title VI of the Civil Rights Act of 1964 prohibits any person, on the ground of race, color, or national origin, from being excluded from participation in, denied the benefits of, or subjected to discrimination

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**Appendix IV: The Department of  
Transportation's Equity Performance Goals  
with Accuracy and Reliability Issues**

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under any program or activity receiving federal financial assistance. National origin includes limited English proficiency. DOT and its operating administrations implement Title VI and its corresponding regulations for DOT's financial assistance. See 42 U.S.C. § 2000d et seq.; 49 C.F.R. pt. 21; Exec. Order 13166, Improving Access to Services for Persons With Limited English Proficiency (Aug. 11, 2000); DOT 1000.12C, The U.S. Department of Transportation Title VI Program (June 11, 2021).

# Appendix V: Comments from the Department of Transportation



**U.S. Department of  
Transportation**  
Office of the Secretary  
of Transportation

Assistant Secretary  
for Administration

1200 New Jersey Avenue, SE  
Washington, DC 20590

July 8, 2024

Elizabeth Repko  
Director, Physical Infrastructure Team  
U.S. Government Accountability Office  
441 G Street NW  
Washington, DC 20548

The U.S. Department of Transportation (DOT or Department) is using the historic funding provided by the Bipartisan Infrastructure Law and the Inflation Reduction Act to make transportation—and the economic opportunities that come with both building and using America’s transportation systems—safe, accessible, and equitably available to all communities while focusing on underserved, overburdened, and disadvantaged communities. The FY 2022-26 DOT Strategic Plan (Strategic Plan) identifies equity as a strategic goal for the Department. In addition, the DOT’s 2023 Equity Action Plan Update (EAP) outlines DOT’s commitments and work to expand access and opportunity to all communities while focusing on underserved, overburdened, and disadvantaged communities. The Department is committed to making progress toward a more equitable transportation system by monitoring progress toward its commitments outlined in the DOT Strategic Plan and the EAP. DOT’s FY 2025 Annual Performance Plan includes 12 performance goals that further support our equity commitments.

The following are examples of actions the Department has undertaken that demonstrate its commitment to equity:

- **Helping Communities Reconnect Through Funding and Technical Assistance:** In March 2024, DOT announced \$3.33 billion in new grant awards for 132 projects through the Reconnecting Communities Pilot and Neighborhood Access and Equity discretionary grant programs. The funding is aimed at reconnecting communities that were cut off by transportation infrastructure decades ago, leaving entire neighborhoods without direct access to opportunity, like schools, jobs, medical offices, and places of worship. In addition, DOT is establishing the Reconnecting Communities Institute, to assist communities in developing and delivering reconnection projects.
- **Providing New Opportunities and Modernizing Regulations to Support Disadvantaged Businesses:** DOT’s Office of Small and Disadvantaged Business Utilization (OSDBU) has held supportive events such as the inaugural Service-Disabled Veteran Owned Small Business event in November 2023 and the 4<sup>th</sup> Annual Women’s Small Business Transportation Summit in March 2024. OSDBU has also launched a program to help small businesses increase access to private equity capital investors. In addition, DOT issued a final rule that modernizes the Disadvantaged Business Enterprise (DBE) program and Airport Concessions DBE program regulations. The updates to these programs will reduce burdens on DBE firms and funding recipients, grow firm capacity and owner wealth, and improve program integrity, visibility, and data collected by DOT.
- **Advancing Investments to Improve Accessibility of Several Transportation Modes:** The Federal Transit Administration has made more than \$1 billion in Federal funding available during Fiscal Years 2023 and 2024 to improve the accessibility of the nation’s oldest and busiest rail transit systems for people with disabilities through the Administration’s All Stations Accessibility Program, which supports upgrades to existing



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**Appendix V: Comments from the Department  
of Transportation**

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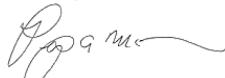
2

subway, commuter rail, and light rail stations that were constructed prior to the enactment of the Americans with Disabilities Act of 1990 (ADA). In addition, the Federal Highway Administration is helping improve the accessibility of roadways by launching an effort to help state DOTs implement their ADA Transition Plans and make the data collected about deficiencies easier for the public to access. Further, DOT also released a Notice of Proposed Rulemaking to strengthen implementation of the Air Carrier Access Act to address mishandling of wheelchairs and improper transfers for air travelers with disabilities who experience delays, damage, and unsafe handling of assistive devices.

Upon review of the draft, DOT concurs with the three GAO recommendations to (1) ensure each equity performance goal has a target or target milestone for the current and subsequent year in its annual performance plan, (2) clarify the performance measures or associated methodology descriptions for the equity performance goals GAO identified as being inconsistent with the practice of clarity, and (3) revise the descriptions of accuracy and reliability in DOT's annual performance report for the equity performance goals GAO identified as not having a sufficient description. We will provide a detailed response to the recommendations within 180 days of the final report's issuance.

DOT appreciates the opportunity to respond to the GAO draft report. Please contact Gary Middleton, Director of Audit Relations and Program Improvement, at (202) 366-6512 with any questions or if GAO would like to obtain additional information.

Sincerely,



Philip A. McNamara  
Assistant Secretary for Administration

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# Appendix VI: GAO Contact and Staff Acknowledgments

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## GAO Contact

Elizabeth Repko, (202) 512-2834 or [repkoe@gao.gov](mailto:repkoe@gao.gov)

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## Staff Acknowledgements

In addition to the contact named above, Alwynne Wilbur (Assistant Director); Catherine Kim (Analyst in Charge); Brady Anderson; Danielle Blazek; Breanne Cave; Melanie Diemel; Benjamin Licht; Alicia Loucks; Mary-Catherine P. Overcash; and A.J. Stephens made key contributions to this report.

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