CRITICAL INFRASTRUCTURE

Sector Plans Complete and Sector Councils Evolving

What GAO Found

Although the nine sector-specific plans GAO reviewed generally met NIPP requirements and DHS’s sector-specific plan guidance, eight did not describe any incentives the sector would use to encourage owners to conduct voluntary risk assessments, as required by the NIPP. Most of the plans included the required elements of the NIPP risk management framework. However, the plans varied in how comprehensively they addressed not only their physical assets, systems, and functions, but also their human and cyber assets, systems and functions, a requirement in the NIPP, because the sectors had differing views on the extent to which they were dependent on each of these assets. A comprehensive identification of all three categories of assets is important, according to DHS plan guidance, because it provides the foundation on which to conduct risk analyses and identify appropriate protective actions. Given the disparity in the plans, it is unclear the extent to which DHS will be able to use them to identify security gaps and critical interdependencies across the sectors. DHS officials said that to determine this, they will need to review the sectors’ annual reports.

Representatives of the government and sector coordinating councils had differing views regarding the value of sector-specific plans and DHS’s review of those plans. While 10 of the 32 council representatives GAO interviewed reported that they saw the plans as being useful for their sectors, representatives of eight councils disagreed because they believed the plans either did not represent a partnership among the necessary key stakeholders, especially the private sector or were not valuable because the sector had already progressed beyond the plan. In addition, representatives of 11 of the 32 councils felt the review process was too lengthy, but 8 thought the review process worked well. The remaining council representatives did not offer views on these issues.

As GAO reported previously, representatives continued to report that their sector councils had preexisting relationships that helped them establish and maintain their sector councils. However, seven of the 32 representatives reported continuing difficulty achieving and maintaining sector council membership, thus limiting the ability of the councils to effectively represent the sector. Eleven council representatives reported continuing difficulties sharing information between the public and private sectors as a challenge, and six council representatives expressed concerns about the viability of the information system DHS intends to rely on to share information about critical infrastructure issues with the sectors or the effectiveness of the Protected Critical Infrastructure Information program—a program that established procedures for the receipt, care, and storage of information submitted to DHS. GAO has outstanding recommendations addressing this issue, with which DHS generally agreed and is in the process of implementing.