What GAO Found

Of the Equal Employment Opportunity Commission’s six equal employment opportunity program model elements, CRD’s action plans focus mainly on the first—agency leadership. Of the 29 action plans developed and implemented by CRD to address the 53 recommendations in the recent external review, almost half center on the leadership element. For example, one action plan involved scheduling training for headquarters and field staff.

CRD took several steps to develop and review action plans to address recommendations from the external review, such as developing a functional review team, assigning project officers, meeting with the Commandant and agency leadership, and consulting the agency financial officer. However, CRD did not consistently document key decisions related to the development and review of the action plans as recommended in federal internal control standards. As a result, CRD lacks transparency and accountability to stakeholders. Lack of documentation also impedes the ability to track progress, make mid-course corrections, and illustrate to stakeholders that it is effectively solving these issues.

According to CRD officials, their priority was to complete the action plans in a timely manner rather than ensure that development and review processes were documented.

GAO reviewed four of CRD’s action plans in relation to generally accepted project management practices to determine the extent to which recommended practices were followed. The recommended practices are:
1. Identifying measurable performance goals,
2. Defining specific tasks,
3. Identifying the person(s) accountable,
4. Identifying interim milestones and checkpoints,
5. Identifying the needed resources,
6. Consulting stakeholders,
7. Defining how to evaluate success.

The selected action plans showed some elements of the project management practices, such as identifying accountable individuals, but fell short in relation to other elements. Specifically, performance goals were identified in the form of a product, such as development of a manual, rather than in relation to a desired outcome, such as demonstrating an increase in the number of staff who know how to properly safeguard personal information. All four action plans we reviewed lacked plans for evaluating their success. CDR officials stated that they were more focused on completing the plans rather than evaluating them, but early evaluation can identify and guide mid-course corrections to ensure positive change.

What GAO Recommends

GAO recommends that the Department of Homeland Security direct the Commandant of the Coast Guard to take the following actions: (1) going forward, ensure internal controls are in place to maintain the documentation necessary to facilitate oversight, (2) establish measurable performance goals for the action plans, and (3) define an evaluation plan for each action plan. DHS concurred with all GAO recommendations.

For more information, contact Laurie Ekstrand at (202) 512-6806 or ekstrandl@gao.gov.