HOMELAND SECURITY ACQUISITIONS

Major Program Assessments Reveal Actions Needed to Improve Accountability

Accessible Version
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Major Program Assessments Reveal Actions Needed to Improve Accountability

What GAO Found

GAO found two of the 22 Department of Homeland Security (DHS) programs it reviewed were on track to meet the initial schedule and cost parameters established after DHS’s current acquisition policy went into effect in November 2008. Fourteen programs had experienced schedule slips, or schedule slips and cost growth, including five programs GAO reviewed because they were at-risk of poor outcomes and nine others. These programs’ cost estimates increased by $9.7 billion, or 18 percent. GAO was unable to assess six programs because DHS leadership had not yet approved baselines establishing their schedules and cost estimates even though these baselines are required by DHS policy. In September 2012, GAO recommended DHS ensure all programs obtain department-level approval for their baselines, and DHS concurred. Individual assessments of each of the 22 programs are presented in appendix I.

<table>
<thead>
<tr>
<th>GAO Assessment of 22 Major DHS Acquisition Programs</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of programs</td>
</tr>
<tr>
<td>--------------------------</td>
</tr>
<tr>
<td>GAO assessed</td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS documentation and data. | GAO-15-171SP

The 22 programs are at different stages of operational testing, and assessments did not always address the key performance parameters (KPP) required to meet the DHS mission. Nineteen of the programs had delivered capabilities to operators, DHS’s Director of Operational Test and Evaluation had assessed operational test results for 13 of these programs, and six had passed the testing. One of these six programs did not meet all of its KPPs, and it was unclear whether two of the other programs had done so because the test assessments did not explicitly address the KPPs. GAO found such ambiguity in 11 of 30 test assessments DHS produced from 2010 to 2014. The risks and benefits of deploying capability without operational testing vary on a program-by-program basis. However, when programs do conduct operational testing, DHS leadership would be better informed to make deployment decisions if it consistently received documentation clearly stating whether systems have met all of their KPPs.

DHS is taking steps to address enduring challenges, but certain issues may hinder oversight. DHS acquisition programs continue to face staffing, funding, and requirements issues, which increase the likelihood that acquisition programs’ schedules will slip and costs will grow. DHS leadership has taken steps to address these challenges. In response to a prior GAO recommendation, DHS established that it would specifically address funding issues during all program reviews. However, it will likely take years to fully resolve the challenges. Additionally, GAO found that certain issues were prevalent at particular components. Both of the Transportation Security Administration (TSA) programs GAO reviewed have changed their scope significantly over time, but these changes are not clearly identified in their current baselines, making it difficult to assess how well the programs have been executed. In fiscal year 2014, the funding plans DHS presented to Congress for the U.S. Coast Guard (USCG) acquisition programs were incomplete, obscuring affordability issues GAO has reported on since 2011. These component-specific issues make it more challenging for DHS leadership and Congress to exercise oversight.

View GAO-15-171SP. For more information, contact Michele Mackin at (202) 512-4841 or mackinm@gao.gov.
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Abbreviations

ARB Acquisition Review Board
CAE Component Acquisition Executive
DHS Department of Homeland Security
DOT&E Director of Operational Test and Evaluation
FYHSP Future Years Homeland Security Program
MD Management Directive
PARM Office of Program Accountability and Risk Management
PPBE Planning, programming, budgeting, and execution
TEMP Test and Evaluation Master Plan
USM Under Secretary for Management

Component Agencies

A&O Analysis and Operations
CBP Customs and Border Protection
FEMA Federal Emergency Management Agency
ICE Immigration and Customs Enforcement
NPPD National Protection and Programs Directorate
TSA Transportation Security Administration
USCG U.S. Coast Guard
USCIS U.S. Citizenship and Immigration Services

Major Acquisition Programs

ACE Automated Commercial Environment
C4ISR Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance
EBSP Electronic Baggage Screening Program
FRC Fast Response Cutter
<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>HSIN</td>
<td>Homeland Security Information Network</td>
</tr>
<tr>
<td>IFT</td>
<td>Integrated Fixed Towers</td>
</tr>
<tr>
<td>LBI</td>
<td>Land Border Integration</td>
</tr>
<tr>
<td>LSCMS</td>
<td>Logistics Supply Chain Management System</td>
</tr>
<tr>
<td>MRS</td>
<td>Medium Range Surveillance</td>
</tr>
<tr>
<td>NCPS</td>
<td>National Cybersecurity Protection System</td>
</tr>
<tr>
<td>NGN-PS</td>
<td>Next Generation Network – Priority Service</td>
</tr>
<tr>
<td>NII</td>
<td>Non-Intrusive Inspection</td>
</tr>
<tr>
<td>NSC</td>
<td>National Security Cutter</td>
</tr>
<tr>
<td>OPC</td>
<td>Offshore Patrol Cutter</td>
</tr>
<tr>
<td>PSP</td>
<td>Passenger Screening Program</td>
</tr>
<tr>
<td>STAMP</td>
<td>Strategic Air and Marine Program</td>
</tr>
<tr>
<td>TACCOM</td>
<td>Tactical Communications</td>
</tr>
<tr>
<td>TECS</td>
<td>Not an acronym</td>
</tr>
</tbody>
</table>

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April 22, 2015

Congressional Requesters

Each year, the Department of Homeland Security (DHS) invests billions of dollars in its major acquisition programs to help execute its many critical missions. In fiscal year 2014 alone, DHS planned to spend approximately $10.7 billion on these acquisition programs, and the department expects it will ultimately invest more than $200 billion in them. DHS and its underlying components are acquiring systems to help secure the border, increase marine safety, screen travelers, enhance cyber security, improve disaster response, and execute a wide variety of other operations. Each of DHS’s major acquisition programs generally costs $300 million or more and spans several years.

To help manage these programs, DHS has established policies and processes for acquisition management, test and evaluation, and resource allocation. We have reported that DHS’s acquisition policy is generally sound, in that it reflects key program management practices. Due to shortfalls in executing the policy, however, we have highlighted DHS acquisition management issues in our high-risk updates since 2005.\(^1\) Over the past several years, our work has identified significant shortcomings in the department’s ability to manage its expanding portfolio of major acquisitions.\(^2\) For example, in September 2012, we reported that 43 of 63 major acquisition programs lacked a department-approved baseline, which establishes a program’s cost, schedule, and performance goals.\(^3\) We also reported that most of the acquisition programs faced funding instability, workforce shortfalls, and changes to requirements or planned capabilities. These challenges can contribute to poor acquisition outcomes, such as cost increases or the risk of end users—such as border patrol agents or first responders in a disaster—receiving

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\(^2\) DHS defines major acquisition programs as those with life-cycle cost estimates of $300 million or more. For examples of past GAO work, see a list of related GAO products at the end of this report.

technologies that do not work as expected. We have made several recommendations to help address these challenges. For example, we recommended DHS leadership specifically address funding issues during all program reviews, and that program managers remain with their programs until their next major milestone when possible. DHS concurred with these recommendations, and has taken steps to implement them.

DHS has taken several steps to improve acquisition management in response to our previous recommendations. For example, the department has dedicated additional resources to acquisition oversight and documented major acquisition decisions in a more transparent and consistent manner. Nonetheless, certain recommendations have yet to be fully addressed. One key recommendation is that DHS ensure all major acquisition programs fully comply with acquisition policy by obtaining department-level approval for acquisition documents before the programs are allowed to proceed. We are encouraged that DHS leadership has acknowledged the importance of these issues, and put forth realistic estimates of the time and effort required to address them.

You asked us to assess DHS’s major acquisition programs, and the Explanatory Statement accompanying a bill to the DHS Appropriations Act, 2015 requires GAO develop a plan for ongoing reviews of these programs. We assessed the extent to which DHS’s major acquisition programs (1) are on track to meet their schedules and cost estimates, (2) have successfully completed operational testing, and (3) are facing common issues department-wide.

To answer these questions, we reviewed all 14 of DHS’s Level 1 acquisition programs—those with life-cycle cost estimates of $1 billion or more—that were in the process of obtaining new capabilities at the initiation of our audit. To provide insight into some of the factors that can lead to poor acquisition outcomes, we also included 8 other major acquisition programs that we or DHS management identified were at risk of not meeting their schedules, cost estimates, or capability requirements.


We use table notes to explicitly identify each of these programs throughout our portfolio analysis. Two of these programs were Level 1 acquisitions, while six of them were Level 2 acquisitions with life-cycle cost estimates between $300 million and $1 billion. In total, the 22 selected programs were sponsored by 8 different DHS components.

For each of the 22 programs, we analyzed acquisition documentation, including schedules, cost estimates, and acquisition program baselines. As of November 2008, these documents required DHS-level approval. We used these documents to construct a data collection instrument for each program, identifying cost growth and schedule slips, if any. We subsequently shared this information with each of the 22 program offices and met with program officials to identify causes and effects associated with any cost growth and schedule slips. We also collected all approved Test and Evaluation Master Plans and letters of assessment issued by DHS’s Director of Operational Test and Evaluation (DOT&E) for each of the 22 programs, and compared them to DHS policy. We met with program officials to identify causes and effects associated with any testing shortfalls, and met with officials responsible for overseeing each programs’ test activities. Finally, we supplemented our own analysis by interviewing DHS headquarters officials and program officials from each of the 22 programs in our scope to gain insight into common challenges across the programs and within specific components. We discussed challenges that contributed to schedule slips, cost growth, or poor test results. We also asked these officials to identify whether funding, workforce, and requirements issues we previously identified were enduring. Additionally, we reviewed key documentation, including the fiscal year 2014 Future Years Homeland Security Program report to Congress, which presents five-year funding plans for each of DHS’s major acquisition programs.

We conducted this performance audit from June 2014 to April 2015 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
To help manage its multi-billion dollar acquisition investments, DHS has established policies and processes for acquisition management, test and evaluation, and resource allocation. The department uses these policies and processes to deliver systems that are intended to close critical capability gaps, and enable DHS to execute its missions and achieve its goals.

**Acquisition Management Policy**

DHS policies and processes for managing its major acquisition programs are primarily set forth in Acquisition Management Directive (MD) 102-01 and DHS Instruction Manual 102-01-001, Acquisition Management Instruction/Guidebook. DHS issued the initial version of this directive in November 2008 in an effort to establish an acquisition management system that effectively provides required capability to operators in support of the department’s missions. DHS’s Under Secretary for Management (USM) is currently designated as the department’s Chief Acquisition Officer, and as such, is responsible for managing the implementation of the department’s acquisition policies.

DHS’s Deputy Secretary and USM serve as the decision authorities for the department’s largest acquisition programs: those with life-cycle cost estimates of $1 billion or greater. Component Acquisition Executives (CAE)—the most senior acquisition management officials within each of DHS’s component agencies—may be delegated decision authority for programs with cost estimates between $300 million and $1 billion. Table 1 identifies how DHS has categorized the 22 major acquisition programs we assess in this report, and table 6 in appendix II specifically identifies the programs within each level.

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6 DHS issued an updated version of MD 102-01 in January 2010 and subsequently updated the guidebook and its appendices.
Table 1: DHS Acquisition Levels for Major Acquisition Programs

<table>
<thead>
<tr>
<th>Level</th>
<th>Life-cycle cost</th>
<th>Acquisition decision authority</th>
<th>Number of programs assessed in this report</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Greater than or equal to $1 billion</td>
<td>Deputy Secretary, Under Secretary for Management/Chief Acquisition Officer</td>
<td>16</td>
</tr>
<tr>
<td>2</td>
<td>$300 million or more, but less than $1 billion</td>
<td>Under Secretary for Management/ Chief Acquisition Officer, or the Component Acquisition Executive</td>
<td>6</td>
</tr>
</tbody>
</table>

Source: GAO analysis of MD 102-01 and DHS’s Master Acquisition Oversight List, | GAO-15-171SP

Notes: Non-major acquisition programs expected to cost less than $300 million are designated Level 3. An acquisition may be raised to a higher acquisition level if (a) its importance to DHS’s strategic and performance plans is disproportionate to its size, (b) it has high executive visibility, (c) it impacts more than one component, (d) it has significant program or policy implications, or (e) the Deputy Secretary, Chief Acquisition Officer, or acquisition decision authority recommends an increase to a higher level.

DHS acquisition policy establishes that a major acquisition program’s decision authority shall review the program at a series of five predetermined acquisition decision events to assess whether the major program is ready to proceed through the acquisition life-cycle phases. An important aspect of a decision event is the decision authority’s review and approval of key acquisition documents, including the program baseline, which establishes a program’s cost, schedule, and performance parameters. Figure 1 depicts the acquisition life cycle established in DHS acquisition policy and where the 22 major acquisition programs we assess in this report fell as of January 2015.
Notes: TECS is not an acronym. C4ISR is an acronym for Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance. USCG NSC advanced from the Obtain to Produce/deploy/support phase in September 2014, three months after we initiated our audit.

The acquisition decision authority is supported by DHS’s Acquisition Review Board (ARB), which reviews major acquisition programs for proper management, oversight, accountability, and alignment with the department’s strategic functions at acquisition decision events and other meetings as needed. The ARB is chaired by the acquisition decision
authority and consists of individuals who manage DHS’s mission objectives, resources, and contracts.

The Office of Program Accountability and Risk Management (PARM) is responsible for DHS’s overall acquisition governance process, supports the ARB, and reports directly to the USM. PARM develops and updates program management policies and practices, reviews major programs, provides guidance for workforce planning activities, provides support to program managers, and collects program performance data.\footnote{For additional information on PARM, see GAO, \textit{Homeland Security Acquisitions: DHS Should Better Define Oversight Roles and Improve Program Reporting to Congress}, GAO-15-292 (Washington, D.C.: March 12, 2015).}

The 22 programs we assess in this report are sponsored by 8 of the department’s component agencies, such as Customs and Border Protection (CBP), the Transportation Security Administration (TSA), and the U.S. Coast Guard (USCG). Within these components, CAEs are responsible for establishing acquisition processes and overseeing the execution of their respective portfolios.

Within the components, program management offices are responsible for planning and executing DHS’s individual programs. They are expected to do so within the cost, schedule, and performance parameters established in their program baselines. If they cannot do so, the programs’ decision authority is to rebaseline the program, that is, establish new cost, schedule, or performance goals.

Figure 2 depicts the relationship between acquisition managers at the department, component, and program level.
Figure 2: DHS’s Acquisition Management Structure

Test and Evaluation Policy

In May 2009, DHS established policies and processes for testing the capabilities delivered by the department’s major acquisition programs.\(^8\)

The primary purpose of test and evaluation is to provide timely, accurate information to managers, decision makers, and other stakeholders to reduce programmatic, financial, schedule, and performance risk. DHS testing policy assigns specific responsibilities to particular individuals and entities throughout the department:

- **Program managers** have overall responsibility for planning and executing their programs' testing strategies. They are responsible for scheduling and funding test activities and delivering systems for testing. They are also responsible for controlling developmental testing. Programs use developmental testing to assist in the development and maturation of products, product elements, or manufacturing or support processes. Developmental testing include any engineering-type test used to verify that design risks are minimized, substantiate achievement of contract technical performance, and certify readiness for operational testing.

- **Operational test agents** are responsible for planning, conducting, and reporting on operational testing, which is intended to provide the acquisition decision authority an evaluation of the operational effectiveness and suitability of a system in a realistic environment. The operational test agents may be organic to the component, another government agency, or a contractor, but must be independent of the developer in order to present credible, objective, and unbiased conclusions. For example, the U.S. Navy Commander, Operational Test and Evaluation Force is the operational test agent for the USCG National Security Cutter (NSC) program.

- **The Director of Operational Test and Evaluation (DOT&E)** is responsible for approving major acquisition programs’ operational test agents, operational test plans, and Test and Evaluation Master Plans (TEMP). A program’s TEMP must describe the developmental and operational testing needed to determine technical performance, limitations, and operational effectiveness and suitability. Operational effectiveness refers to the overall ability of a system to provide desired capability when used by representative personnel. Operational suitability refers to the degree to which a system can be placed in field use and sustained satisfactorily. As appropriate, DOT&E is also responsible for participating in operational test readiness reviews, observing operational tests, reviewing operational test agents’ reports, and assessing the reports. Prior to a program’s ADE 3, DOT&E provides the program’s acquisition decision authority a letter of assessment that includes an appraisal of the program’s
operational test, a concurrence or non-concurrence with the operational test agent’s evaluation, and any further independent analysis.

As an acquisition program proceeds through its life cycle, the testing emphasis moves gradually from developmental testing to operational testing. See figure 3.

**Figure 3: Test Activities Established by DHS Policy**

<table>
<thead>
<tr>
<th>Acquisition phases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Need</td>
</tr>
<tr>
<td>DHS officials identify the need for a new acquisition program.</td>
</tr>
<tr>
<td>Analyze / select</td>
</tr>
<tr>
<td>Program manager reviews alternative approaches to meeting the need and recommends a best option to the decision authority.</td>
</tr>
<tr>
<td>Obtain</td>
</tr>
<tr>
<td>Program manager develops, tests, and evaluates the selected option; programs may proceed through ADE 2B, which focuses on an individual project, and ADE 2C.</td>
</tr>
<tr>
<td>Produce / deploy / support</td>
</tr>
<tr>
<td>DHS delivers the new capability to its operators, and maintains the capability until it is retired; post-deployment activities tend to account for up to 70 percent of an acquisition program’s life-cycle.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Acquisition decision events (ADE)</th>
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<tbody>
<tr>
<td>ADE 2A</td>
</tr>
<tr>
<td>ADE 2B</td>
</tr>
<tr>
<td>ADE 2C</td>
</tr>
<tr>
<td>ADE 3</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Test activities</th>
</tr>
</thead>
<tbody>
<tr>
<td>Director of Operational Test and Evaluation (DOT&amp;E) approves Test and Evaluation Master Plan</td>
</tr>
<tr>
<td>Program conducts developmental testing</td>
</tr>
<tr>
<td>Operational test agent conducts operational testing</td>
</tr>
<tr>
<td>DOT&amp;E issues letter of assessment</td>
</tr>
<tr>
<td>Program deploys capability</td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS testing and acquisition policies. | GAO-15-171SP

**Resource Allocation Process**

DHS has established a planning, programming, budgeting, and execution (PPBE) process to allocate resources to acquisition programs and other entities throughout the department. DHS’s PPBE process produces the multi-year funding plans presented in the Future Years Homeland Security Program (FYHSP), a database that contains, among other things, 5-year funding plans for DHS’s major acquisition programs. DHS guidance states that the 5-year plans in the FYHSP should allow the

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department to achieve its goals more efficiently than an incremental approach based on 1-year plans. DHS guidance also states that the FYHSP articulates how the department will achieve its strategic goals within fiscal constraints.

According to DHS guidance, at the outset of the annual PPBE process, the department’s Office of Policy and Chief Financial Officer should provide planning and fiscal guidance, respectively, to the department’s component agencies. In accordance with this guidance, the components should submit 5-year funding plans to the Chief Financial Officer; these plans are subsequently reviewed by DHS’s senior leaders, including the DHS Secretary and Deputy Secretary. DHS’s senior leaders are expected to modify the plans in accordance with their priorities and assessments, and submit them to the Office of Management and Budget, which uses the plans to inform the President's annual budget request. Figure 4 depicts DHS’s annual PPBE process.

Federal law requires DHS to submit an annual FYHSP report to Congress at or about the same time as the President’s budget request. \(^\text{10}\) This

\(^\text{10}\) DHS is required to include the same type of information, organizational structure, and level of detail in the FYHSP as the Department of Defense is required to include in its Future Years Defense Program. 6 U.S.C. § 454.
FYHSP report presents the 5-year funding plans in the FYHSP database at that time.\footnote{For additional information on past FYHSP reports, see GAO-14-332.}

Within DHS’s Office of the Chief Financial Officer, the Office of Program Analysis and Evaluation is responsible for establishing policies for the PPBE process and overseeing the development of the FYHSP. In this role, the Office of Program Analysis and Evaluation reviews the components’ 5-year funding plans, advises DHS’s senior leaders on resource allocation issues, maintains the FYHSP database, and submits the annual FYHSP report to Congress.

Two Programs On Track to Meet Schedule and Cost, 14 Were Not, and Six Could Not Be Assessed

CBP’s Automated Commercial Environment (ACE) program and TSA’s Electronic Baggage Screening Program (EBSP) were on track to meet the initial schedules and cost estimates established after DHS’s current acquisition policy went into effect in November 2008. Fourteen other programs experienced schedule slips, including seven that also experienced cost growth. These 14 programs included five that we reviewed because we identified them as at-risk programs and nine others. In aggregate, these programs’ cost estimates increased by $9.7 billion.

We were unable to assess schedule and cost progress for six programs because DHS leadership had not yet approved baselines establishing their schedules and cost estimates. Table 2 summarizes our findings, and more detail is presented below the table.
Table 2: Major Acquisition Programs’ Progress Against Their Schedules and Cost Estimates

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>On track against initial baselines</th>
<th>Schedule slips</th>
<th>Cost growth</th>
<th>No department-approved baseline</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analysis and Operations (A&amp;O)</td>
<td>Homeland Security Information Network (HSIN)&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Customs and Border Protection (CBP)</td>
<td>Automated Commercial Environment (ACE)</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Integrated FiYessed Towers (IFT)&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Land Border Integration (LBI)</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Non-Intrusive Inspection (NII) Systems</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Strategic Air and Marine Program (STAMP)&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Tactical Communications (TACCOM) Modernization&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>TECS (not an acronym) Modernization&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Federal Emergency Management Agency (FEMA)</td>
<td>Logistics Supply Chain Management System (LSCMS)&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td>Immigration and Customs Enforcement (ICE)</td>
<td>TECS (not an acronym) Modernization&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>National Protection and Programs Directorate (NPPD)</td>
<td>National Cybersecurity Protection System (NCPS)</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>NeYest Generation Network – Priority Service (NGN-PS)</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Transportation Security Administration (TSA)</td>
<td>Electronic Baggage Screening Program (EBSP)</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Passenger Screening Program (PSP)</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>U.S. Coast Guard (USCG)</td>
<td>C4ISR&lt;sup&gt;b&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Fast Response Cutter (FRC)&lt;sup&gt;a&lt;/sup&gt;</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>HH-65 Conversion/Sustainment Projects</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Long Range Surveillance Aircraft (HC-130H/J)</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Medium Range Surveillance (MRS) Aircraft</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>National Security Cutter (NSC)</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Offshore Patrol Cutter (OPC)</td>
<td>NO</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>U.S. Citizenship and Immigration Services (USCIS)</td>
<td>Transformation</td>
<td>NO</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS documentation and data. | GAO-15-171SP

<sup>a</sup>At risk program that we reviewed to provide insight into some factors that can lead to poor acquisition outcomes.

<sup>b</sup>C4ISR is an acronym for Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance.
Programs on Track to Meet Schedules and Cost Estimates

CBP ACE and TSA EBSP were on track to meet schedules and cost estimates approved by DHS leadership. Officials from both programs identified specific actions they had taken to keep their programs on track, and other programs could potentially benefit from taking similar actions. However, in the future, it may be difficult to determine whether EBSP has remained on track because TSA officials plan to eliminate major milestones from the program’s baseline.

CBP ACE

The ACE program struggled to develop capability for several years, but recently, it has remained on track to meet its approved schedule and cost estimate. From January 2006 to August 2013, the program’s full operational capability date slipped more than five years, and its life-cycle cost estimate increased by $1.1 billion. In 2010, the program manager stated that ACE requirements had not been clearly established and that the scope and complexity of various projects had been underestimated. The program manager also said that the program had used approximately 80 percent of its budget to deliver approximately 35 percent of its end product. The program subsequently initiated a re-planning effort, and in August 2013, the program rebaselined. Since that time, ACE’s schedule and cost estimates have remained stable. Program officials attributed this recent performance to several factors, including the adoption of an agile software development methodology, the consolidation of ACE infrastructure, and the use of cloud services and open source software, which lowered licensing costs.

TSA EBSP

From August 2012 to January 2015, TSA decreased EBSP’s acquisition cost estimate from $14.5 billion to $14.1 billion, and its life-cycle cost estimate from $21.2 billion to $20.3 billion. TSA officials said they did so by extending the useful lifespan of baggage screening systems, implementing improved field maintenance procedures, and focusing on detection capabilities rather than other priorities, such as screening efficiency. TSA officials took these actions in response to funding constraints, and it appears EBSP’s projected funding levels now cover nearly all of the program’s estimated costs. However, it is less clear whether EBSP will remain on schedule going forward. In August 2012,
when the USM approved the EBSP baseline, the program planned to
award contracts to procure screening systems that could detect five new
threat materials by September 2015, and additional systems that could
detect certain home-made explosives by September 2018. In December
2014, though, TSA officials told us they could not provide an update
identifying when they expected to award these procurement contracts.
Program officials said certain contractors’ systems have had difficulty
achieving new detection requirements, and in June 2014, DHS’s Deputy
Chief Procurement Officer approved a revised acquisition plan that
eliminated specific procurement timelines. The EBSP program manager
told us that, going forward, the program wants to focus on demonstrating
that systems can deliver enhanced detection capabilities rather than
deploying specific quantities in certain timeframes. They said this
approach will provide TSA flexibility to make risk-based decisions about
the scale of capability deployments. However, the USM has not yet
approved the elimination of the specific procurement timelines, which are
currently the program’s only remaining milestones. If the USM does
approve the elimination of these milestones, it could be difficult to identify
future schedule slips and hold the program accountable for these slips.
EBSP program officials expect the USM will decide whether to approve
the elimination of the milestones by the end of June 2015.

Programs with Schedule Slips

Fourteen programs have at least one major milestone that slipped since
DHS established its current acquisition policy in November 2008. Figure 5
identifies the 14 programs that have had schedule slips and the extent to
which their major milestones have slipped.
On average, these program milestones slipped more than three-and-a-half years. Program officials identified a number of reasons why this happened. Some cited challenges in meeting requirements. For example, officials from the USCIS Transformation program said they spent years trying to automate some of the agency’s activities before determining they could not do so. Officials from the CBP TECS Modernization program attributed its schedule delays to technical difficulties. In another case, officials from the TSA PSP program said they had originally established unachievable milestones. Additionally, officials from seven programs—including one that had not yet experienced a slip: CBP LBI—said their programs were at risk of future schedule slips due to anticipated funding constraints, bid protests, or workforce shortfalls.

We elaborate on the reasons for all 14 programs’ schedule slips in their individual assessments in appendix I.
Programs with Cost Growth

Seven programs’ costs have grown beyond the thresholds initially approved by DHS leadership after the department established its current acquisition policy in 2008. In total, the seven programs’ acquisition cost estimates have increased by 40 percent, and their life-cycle cost estimates have increased by almost 18 percent, or $9.7 billion. Figure 6 identifies the seven programs that have experienced cost growth, and the extent to which their acquisition and life-cycle cost estimates have increased.

Program officials identified a number of reasons why their cost estimates increased.

- In some instances, these officials attributed cost growth to the introduction of new capability requirements. For example, officials from the USCG HC-130H/J program said their acquisition cost estimate increased when they increased the number of HC-130J aircraft they expected to procure. Officials from the NPPD NGN-PS
program said their cost estimate increased when they included an additional capability increment.

- In other instances, officials said they developed more reliable cost estimates. For example, the USCIS Transformation program’s life-cycle cost estimate increased when the program accounted for seven additional years of operational costs to be consistent with industry standards. Similarly, the USCG HH-65 program’s life-cycle cost estimate increased when the program accounted for USCG’s decision to extend the aircraft’s operational life from 2030 to 2039.

We elaborate on the reasons for the programs’ cost growth in their individual assessments, presented in appendix I.

**Programs without Baselines**

Six programs lacked baselines approved by DHS leadership even though they were required by DHS policy. This prevented us from assessing whether the programs were on track to meet their cost estimates and schedules. DHS acquisition policy establishes that the program baseline is the agreement between the program manager, component head, and acquisition decision authority—often DHS’s Deputy Secretary or USM—establishing how systems will perform, when they will be delivered, and what they will cost. Four of these programs are sponsored by CBP: LBI, NII, StAMP, and TACCOM Modernization. These programs received more than $5 billion in appropriations through fiscal year 2014. A fifth program, FEMA’s LSCMS, also lacks a department-approved baseline. In April 2014, based on the preliminary results of a DHS Office of Inspector General report that identified this deficiency, the acting USM directed FEMA not to initiate the development of any new LSCMS capabilities until further notice. As a relatively new program, USCG’s MRS Aircraft program has not yet had its baseline approved. The MRS Aircraft program was established in October 2014 when DHS leadership directed USCG to restructure the HC-144A Maritime Patrol Aircraft program to accommodate the addition of 14 C-27J aircraft.\(^{12}\)

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\(^{12}\) We are issuing a separate report focused on the transfer of the C-27J aircraft from the Air Force to the Coast Guard.
We have previously reported on this issue. In September 2012, we found that 43 of 63 major acquisition programs lacked a department-approved baseline. At that time, we recommended DHS ensure all major acquisition programs fully comply with DHS acquisition policy by obtaining department-level approval for program baselines before approving their movement through the acquisition life cycle. The department concurred with this recommendation, but until DHS ensures full compliance with its policy, as we previously recommended, department leadership and Congress will be hindered in their efforts to hold the programs accountable for their performance. PARM officials said it is realistic to expect DHS leadership can approve baselines for five of the six programs by the end of fiscal year 2015. The exception is FEMA LSCMS, which needs an approved life-cycle cost estimate before it can submit its baseline to DHS leadership for approval.

Future Funding Requirements

For the 22 programs we reviewed, DHS reported Congress had appropriated more than $37 billion through fiscal year 2014, but DHS will require much more funding in the future to fully execute these programs. In aggregate, these programs’ life-cycle cost estimates total nearly $200 billion. Life-cycle cost estimates account for all past, present and future costs, spanning development, production, deployment, sustainment, and disposal activities. These 22 programs, at a minimum, have initiated development efforts, and in most cases have initiated production. This means that while DHS has invested significant time and resources to date, it likely requires well over $100 billion in future funding to fully execute the programs. Based on information reported in the FYHSP, the USCG programs account for the bulk—more than 85 percent—of the anticipated funding requirements. The Offshore Patrol Cutter program alone, which is expected to remain in service through 2065, accounts for almost $54 billion, while the other six USCG programs account for an additional $86 billion. However, DHS officials told us they did not account for all of the appropriations allocated to USCG programs in the past when they reported this information to Congress. Specifically, they told us that they did not account for all of the operations and maintenance funding USCG allocated to its major acquisition programs. This shortfall hinders independent efforts to calculate the magnitude of DHS’s future funding requirements. Nonetheless, figure 7 presents the 22 programs’ appropriations through fiscal year 2014, as DHS reports them to Congress, adjacent to their respective life-cycle cost estimates, and provides a sense of the magnitude of future funding requirements.
According to DHS officials, the appropriations data reported in the FYHSP do not account for all of the operations and maintenance funding USCG allocates to its major acquisition programs.
Therefore, the data in this figure do not reflect the complete amounts appropriated to the USCG programs.

According to a senior CBP official, the CBP Strategic Air and Marine Program (SIAMP) has not produced a comprehensive life-cycle cost estimate because CBP’s Office of Air and Marine is not set up to create such estimates. However, in January 2015, the Acting Deputy USM established that the ARB will review SIAMP semiannually until the program is in compliance with DHS acquisition policy, which requires programs produce life-cycle cost estimates. DHS Instruction Manual 102-01-001, Acquisition Management Instruction/Guidebook, October 1, 2011 at 35.

We have previously concluded that DHS’s major acquisition portfolio is not affordable, and recommended that the department update its resource allocation guidance to fully reflect key portfolio management practices. At that same time, we recommended DHS establish priorities across functional portfolios—such as cybersecurity, domain awareness, and law enforcement—and allocate resources accordingly in order to address its major acquisition funding gap. DHS concurred with both recommendations, but has not yet implemented them. We believe that fully implementing these recommendations would help DHS improve the affordability of its major acquisition portfolio.

The 22 Programs Are at Different Stages of Operational Testing and Assessments Did Not Always Address Key Performance Parameters

Nineteen of the 22 programs we reviewed had deployed capabilities, meaning that some capabilities had been delivered to operators. Fifteen of these 19 programs were operationally tested, while DHS leadership had exempted four of them. Operational testing is intended to help DOT&E determine how well a system will provide desired capability before the system is actually deployed. As part of this process, DOT&E issues letters of assessment that communicate an appraisal of the adequacy of an operational test, a concurrence or non-concurrence with the operational test report’s conclusions, and any further independent analysis DOT&E conducted. DOT&E had assessed the operational test results for 13 of these 15 programs, and six of these 13 programs had

13 GAO-14-332.

14 For the purposes of this review, our definition of operational testing includes operational test and evaluation, including initial and follow-on operational test and evaluation; operational assessment; and limited user test. We chose to define operational testing in this manner to develop a more comprehensive account of how DHS is testing its major acquisition programs.
passed the test. DOT&E did not assess two programs’ test results. Table 3 identifies all 22 programs we reviewed, whether they had deployed capabilities, whether they were operationally tested, whether DOT&E assessed the results, and if so, whether the programs passed. Under DHS policy, programs generally should be operationally tested before deploying capabilities. Further detail is presented after the table.

Table 3: The Director of Operational Test and Evaluation’s (DOT&E) Assessments of Major Acquisitions

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>Program deployed capabilities</th>
<th>Program was operationally tested</th>
<th>DOT&amp;E assessed test(s)</th>
<th>Program passed test(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analysis and Operations (A&amp;O)</td>
<td>Homeland Security Information Network (HSIN)a</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Customs and Border Protection (CBP)</td>
<td>Automated Commercial Environment (ACE)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Integrated FreeYesed Towers (IFT)a</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Land Border Integration (LBI)</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Non-Intrusive Inspection (NII) Systems</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Strategic Air and Marine Program (SiAMP)/Multi-Role Enforcement Aircrafta</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Tactical Communications (TACCOM) Modernizationa</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Federal Emergency Management Agency (FEMA)</td>
<td>Logistics Supply Chain Management System (LSCMS)a</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td>Immigration and Customs Enforcement (ICE)</td>
<td>TECS (not an acronym) Modernizationa</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>National Protection and Programs Directorate (NPPD)</td>
<td>National Cybersecurity Protection System (NCPS)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>NeYest Generation Network – Priority Service (NGN-PS)</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td>Transportation Security Administration (TSA)</td>
<td>Electronic Baggage Screening Program (EBSP)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Passenger Screening Program (PSP)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td>U.S. Coast Guard (USCG)</td>
<td>C4ISRa</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Fast Response Cutter (FRC)a</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>HH-65 Conversion/Sustainment Projects</td>
<td>YES</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Long Range Surveillance Aircraft (HC-130H/J)</td>
<td>YES</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
<tr>
<td></td>
<td>Medium Range Surveillance (MRS) Aircraft/HC-144A</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>National Security Cutter (NSC)</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Offshore Patrol Cutter (OPC)</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
<td>NO</td>
</tr>
</tbody>
</table>
Programs that Were Operationally Tested

Fifteen programs were operationally tested. DOT&E assessed the operational test results for 13 of these programs, and determined that six programs had developed systems that were effective and suitable, meaning the programs passed operational testing. However, one of the six programs, the USCG NSC, did not meet all of its key performance parameters during testing. Key performance parameters are capability/system attributes or characteristics that are considered critical or essential, and are required to successfully meet the DHS mission. Further, it was unclear whether systems developed by two of the other programs that passed operational testing had met all of their key performance parameters: CBP TECS Modernization inspection systems, and the USCG’s HC-144A aircraft, which has now been incorporated within the new MRS Aircraft program. Of the 15 programs that were operationally tested, table 4 identifies the six that passed the tests, and the five with systems that clearly met their key performance parameters.

Table 4: Programs That Were Operationally Tested

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>Program passed operational testing</th>
<th>Assessment(s) clearly indicated key performance parameters were met</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analysis and Operations (A&amp;O)</td>
<td>Homeland Security Information Network (HSIN)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Customs and Border Protection (CBP)</td>
<td>Automated Commercial Environment (ACE)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Custom and Border Protection</td>
<td>Land Border Integration (LBI)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Strategic Air and Marine Program (StAMP)/Multi-Role Enforcement Aircraft</td>
<td>No</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Tactical Communications (TACCOM) Modernization</td>
<td>No</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>TECS (not an acronym) Modernization</td>
<td>YES</td>
<td>No</td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS documentation and data. | GAO-15-171SP

aAt risk program that we reviewed to provide insight into some factors that can lead to poor acquisition outcomes.
bC4ISR is an acronym for Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance.
As reflected in table 4, DOT&E determined that six programs’ systems were operationally effective and suitable, and clearly documented in the assessments that three of these programs had developed systems that met their key performance parameters: NPPD’s NCPS, and TSA’s EBSP and PSP. These programs have not yet completed all of their development efforts, and will require further operational testing in the future. DOT&E determined that one of NCPS’s five capability “blocks” was operationally effective and suitable, but the program has not yet demonstrated it can meet the requirements for its other blocks, including one that NCPS is currently deploying, and one that NCPS plans to deploy in the coming years. Additionally, DOT&E determined that three of the seven PSP systems were operationally effective and suitable, but identified problems with the other four. For example, DOT&E found that three PSP systems did not meet key performance parameters concerning the number of bags they were required to process per hour. As for EBSP, DOT&E determined that five of its nine systems were operationally effective and suitable, but identified problems with the other four.
effective and suitable. However, it was unclear whether three of these systems could meet all of their key performance parameters because they were not explicitly addressed in the DOT&E letters of assessment. Similarly, DOT&E determined that the USCG MRS program’s HC-144A aircraft and two increments of the CBP TECS Modernization program’s inspection system were effective and suitable, but it was again unclear whether they had met all of their key performance parameters because they were not explicitly addressed in the letters of assessment.

We found such ambiguity was a relatively common issue across DOT&E’s letters of assessment. We reviewed 30 letters of assessment that DOT&E issued from 2010 to 2014, and we found that 11 did not clearly identify whether the respective systems met all of their key performance parameters. DHS testing policy establishes that DOT&E’s role is to help determine whether a program is prepared to initiate deployments and that DOT&E will identify whether systems are operationally effective and suitable. However, the policy does not explicitly state that DOT&E must identify whether a system meets all of the key performance parameters set forth in its program baseline. This is an important distinction because there is not a consistent correlation between a system meeting all key performance parameters and being deemed operationally effective and suitable. For example, DOT&E determined that the CBP TACCOM Modernization system and the StAMP program’s Multi-Role Enforcement Aircraft could meet their key performance parameters, but did not determine these systems were both operationally effective and operationally suitable. Alternatively, DOT&E did not determine that the USCG NSC could meet all of its key performance parameters, but did determine it was operationally effective and suitable. In February 2015, DHS’s DOT&E told us that DHS leadership decided to emulate the Department of Defense when it established DHS’s test policy in 2009, and that DHS needs to revise the policy to more directly address key performance parameters, as well as cybersecurity and interoperability requirements.

DHS testing policy establishes that the primary purpose of test and evaluation is to provide timely, accurate information to managers, decision makers, and other stakeholders to reduce programmatic, financial, schedule, and performance risk. To this end, DOT&E generally

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identified whether the programs’ systems were operationally effective and suitable. However, without a specific discussion of whether systems met all of their key performance parameters in each letter of assessment, DHS leadership may not have all of the information needed to make deployment authorization decisions.

Programs That Did Not Pass Operational Testing

DOT&E did not determine that seven programs had developed systems that were both operationally effective and operationally suitable, including the CBP StAMP and TACCOM Modernization systems, which met their key performance parameters. In these two cases, DOT&E identified shortfalls with the operational tests themselves, rather than the systems. For example, the StAMP test evaluated the Multi-Role Enforcement Aircraft, but the test did not address the air interdiction capability, which does not have a corresponding key performance parameter. Additionally, the TACCOM Modernization test was not conducted over a sufficient period of time, and DOT&E could not determine whether the system was operationally suitable, although it was deemed operationally effective. DOT&E did not determine the other five programs had developed systems that were operationally effective and suitable for various reasons, including technical challenges. DOT&E recommended that many of these programs schedule follow-on testing. In one case—USCG FRC—DOT&E recommended USCG field the FRC even though USCG had not yet demonstrated it had corrected severe deficiencies, citing USCG’s ongoing mitigation efforts.

Programs That DOT&E Did Not Assess

DOT&E did not issue letters of assessment for two programs that were operationally tested: CBP’s LBI and USCG’s HH-65 Conversion/Sustainment Projects. Officials from CBP’s LBI program told us that they were operationally tested and proceeded with deployments even though DOT&E had not assessed the test results. The Director told us his office did not provide an official assessment because the program did not request formal authorization from DHS leadership to deploy. In the case of the HH-65 program, the former DOT&E responsible for producing letters of assessment when the program was operationally tested in 2009 said he did not do so because his office was not yet fully staffed, and he had not yet established a process for implementing DHS’s test policy. The current DOT&E is not scheduled to issue a letter of assessment for the HH-65 program until fiscal year 2019 at the earliest, after all of the program’s planned upgrades are tested.
We elaborate on each of the programs’ test activities in their individual program assessments in appendix I.

Programs That Were Not Operationally Tested

Seven of the 22 programs we reviewed were not operationally tested. Three of these programs had not yet deployed capability, meaning they were not yet to the point when DHS policy suggests programs should be operationally tested. DHS leadership had authorized four to deploy capabilities without operational testing. Table 5 identifies the programs that were not operationally tested and whether they had deployed capability.

Table 5: Programs That Were Not Operationally Tested

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>Deployed capability</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customs and Border Protection (CBP)</td>
<td>Integrated Fixed Towers (IFT)(^a)</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Non-Intrusive Inspection (NII) Systems</td>
<td>Yes</td>
</tr>
<tr>
<td>Immigration and Customs Enforcement (ICE)</td>
<td>TECS (not an acronym) Modernization(^b)</td>
<td>No</td>
</tr>
<tr>
<td>National Protection and Programs Directorate (NPPD)</td>
<td>Next Generation Network – Priority Service (NGN-PS)</td>
<td>Yes</td>
</tr>
<tr>
<td>U.S. Coast Guard (USCG)</td>
<td>C4ISR(^b)</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Long Range Surveillance Aircraft (HC-130H/J)</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>Offshore Patrol Cutter (OPC)</td>
<td>No</td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS documentation and data. | GAO-15-171SP

\(^a\)At risk program that we reviewed to provide insight into some factors that can lead to poor acquisition outcomes.

\(^b\)C4ISR is an acronym for Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance.

DHS policy establishes that programs generally should be operationally tested before deploying capabilities, but DHS leadership allowed four programs to deploy capability without operational testing for various reasons: CBP’s NII, NPPD’s NGN-PS, and USCG’s C4ISR and HC-130H/J programs. DOT&E determined that the NII program does adequate acceptance testing on commercial-off-the-shelf systems, and that it does not need a TEMP or operational testing until CBP begins to pursue the next generation of NII capabilities. Similarly, DOT&E established that the NGN-PS program could use acceptance testing, among other things, to determine whether service providers are meeting requirements. As for the HC-130H/J program, the U.S. Air Force previously conducted operational testing on the HC-130J aircraft, and DOT&E determined that it did not need additional operational testing. In
the case of the C4ISR program, DHS leadership approved USCG’s plan to deploy capability without operational testing. USCG officials have decided to test the C4ISR system in conjunction with aircraft and vessels, rather than on a standalone basis, to save money and avoid duplication. The risks and benefits associated with deploying capability without operational testing vary on a program-by-program basis. This review was not designed to assess DHS leadership’s rationale for these deployment decisions. However, we did identify that the USCG C4ISR system’s key performance parameters were not specifically evaluated during past aircraft and vessel tests, and in 2014 we recommended USCG fully integrate C4ISR assessments into other assets’ test plans or test the C4ISR program independently. USCG concurred with this recommendation, and stated it would implement it in fiscal year 2015.

We elaborate on each of the programs’ test activities in their individual program assessments, presented in appendix I.

### Increased Focus On Developmental Testing

Going forward, DOT&E has expressed interest in becoming more involved in testing earlier in the development process to increase influence over program execution. The Director told us that this would help mitigate risk for all types of programs, particularly those that are fielding IT-centric systems. PARM officials and DOT&E representatives identified that DHS’s current policy for operational testing is not appropriate for IT-centric systems. DOT&E explained that key decisions are often made earlier in the development process, particularly when IT programs are using an agile software development approach, which typically delivers new capabilities every one to eight weeks. Operational testing is often conducted after these key decisions have already been made, meaning operational testing was not conducted early enough to inform the key decisions and mitigate risk as intended by DHS testing policy. DHS is working to determine how test activities should inform agile software development programs’ key decisions in the future. DOT&E has stated that operational test agents should be more involved with developmental testing in the future.

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DHS Is Taking Steps to Address Enduring Challenges but Certain Component-Specific Issues May Hinder Oversight

DHS acquisition programs continue to face staffing, funding, and requirements issues that we previously identified were prevalent department-wide. These challenges increase the likelihood that acquisition programs will cost more and take longer to deliver capabilities than expected. DHS leadership is aware of these problems and has taken some steps to address them, but it will likely take years to fully resolve them. Additionally, we found that certain issues were particularly prevalent at particular components. Each of these component-specific issues makes it more challenging for DHS headquarters and Congress to exercise oversight.

Staffing Shortfalls

DHS headquarters reported that 21 of the 22 programs we reviewed faced shortfalls in their program office workforce in fiscal year 2014. These shortfalls can pertain to such positions as program managers, systems engineers, and logisticians. However, officials from 15 of the 21 programs did not identify negative effects from these shortfalls, suggesting that officials at DHS headquarters and program offices have different views on staffing needs. The Executive Director of PARM acknowledged that standardized staffing templates do not always account for the varying quality of people, or particular aspects of specific programs, and said that PARM officials developed the templates to help prioritize future staffing assessments.

Funding Gaps

For the 22 programs in our review, we compared their estimated funding needs for fiscal years 2014 to 2018 to the amounts set forth in the Future Years Homeland Security Program report DHS submitted to Congress in fiscal year 2014. We found that 11 of the 22 programs face funding gaps of 10 percent or greater over this period, including five programs that face

17 GAO-12-833, GAO-14-332.
funding gaps of 30 percent or greater. These funding gaps can be caused by cost growth, unreliable cost estimates, requirements changes, revised funding priorities, and other factors.

We previously found that DHS’s Chief Financial Officer had identified a 30 percent funding gap, from fiscal years 2014 to 2018, across the department’s entire major acquisition portfolio. While we noted this acknowledgement was a positive step toward addressing the department’s funding gap, funding gaps of this extent are likely to negatively impact program execution. For example, officials from six of the 22 programs in our review attributed schedule slips to past funding gaps. We have made prior recommendations that the Secretary of Homeland Security require the ARB to assess program-specific affordability tradeoffs at all of its meetings. In response, in June 2014, DHS’s acting Chief Financial Officer established that the ARB would specifically address affordability issues during all program reviews, and as necessary, document explicit tradeoffs among cost, schedule, and capability requirements. This is an important step toward closing the department’s acquisition funding gap.

Requirements Changes

We found that requirements changes were common across the 22 acquisition programs in our review. These are situations where programs have revised their requirements after they initiated efforts to obtain new capabilities. We have previously concluded that relaxing requirements can help mitigate affordability and schedule risks. These changes, however, can also indicate that a program is facing execution challenges or expanding its scope beyond what was initially envisioned. During this audit, we found programs changed requirements for various reasons. Some reduced them in response to technology development challenges or affordability issues. For example, the CBP TECS Modernization program worked with end users to eliminate certain capability requirements in order to reduce operating costs. Alternatively, the two TSA programs increased requirements in response to evolving threats and operator feedback. Several program officials said they changed their

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18 GAO-14-332.
19 GAO-12-833.
programs’ requirements because they were not defined properly in the first place. For example, USCIS’s Transformation program eliminated some of its requirements after determining they were unnecessarily demanding and unrealistic. We elaborate on the programs’ requirements changes in their individual assessments, presented in appendix I.

Component-Specific Concerns

We found certain issues that were particularly prevalent at three DHS components. These issues make it more difficult to determine how well the programs have been executed and can hinder the ability of DHS leadership and Congress to hold the programs and components accountable for acquisition outcomes.

- CBP: We found that DHS leadership had not baselined four of the seven CBP programs we reviewed in accordance with DHS policy, meaning there is no agreed upon standard against which program performance can be measured. These programs include StAMP, which has never produced a life-cycle cost estimate that accounts for all of the program’s expected operations and maintenance costs. In this case, we determined that this omission may be understating the programs’ future costs by billions of dollars. However, DHS leadership has recently increased its oversight of this program. For example, in January 2015, the Acting Deputy USM established that the ARB will review StAMP every six months until the program is in compliance with DHS acquisition policy, which requires comprehensive life-cycle cost estimates. PARM officials told us they expect DHS leadership can approve baselines for all four of the CBP programs by the end of fiscal year 2015. These would be positive steps to improve accountability.

- TSA: We found that both of the TSA programs in our review lacked traceability across their various baseline iterations, even though DHS acquisition policy establishes that program baselines should capture the overall historical record of a program’s changes. The original baselines for these two programs have been revised multiple times and now include different systems and cover different time frames. In addition, some requirements have been dropped and some costs incurred under the programs have been excluded from their current baselines. For example, the 2014 version of the PSP program’s baseline did not account for the Stand Off Detection project, which was estimated to cost $267 million in the 2008 version of the PSP baseline. Not tracking changes clearly from one baseline to the next
Letter

observes how well the programs have been executed over time. These inconsistencies make it difficult to identify whether the programs are actually on track to meet their initial cost estimates and schedules, or the extent to which the programs costs have grown and schedules have slipped.

- USCG: We found that the funding plans DHS presented to Congress in fiscal year 2014 for the USCG programs are incomplete, in that they do not account for all of the operations and maintenance funding USCG plans to allocate to its major acquisition programs. We previously found that the USCG funding plans presented to Congress in fiscal year 2012 had a similar shortfall. Internal control standards for the federal government state that management should ensure there is adequate communication with external stakeholders that may have a significant impact on the agency achieving its goals. These persistent gaps in funding information reduce the value of the funding plans presented to Congress. They also obscure the affordability of USCG programs, which we have reported on since 2011. Similarly, in October 2014, DHS leadership expressed concerns about the affordability of USCG programs and directed USCG to conduct an affordability analysis. DHS headquarters officials said the USCG funding plans are not accurate because of the way the component’s personnel are entering data into the FYHSP system. The other components’ funding plans did not have this omission.

Conclusions

DHS leadership has taken a number of steps in recent years to improve acquisition management, establishing a policy that largely reflects key program management practices, and baselining many of its major acquisition programs. These steps have improved DHS’s ability to manage these programs and enabled more robust oversight. Additionally, in fiscal year 2015, DHS officials are continuing to work to establish

20 GAO-14-332.


22 GAO, Coast Guard: Action Needed As Approved Deepwater Program Remains Unachievable, GAO-11-743 (Washington, D.C.: July 28, 2011); GAO-14-450.
baselines for the programs—mostly under CBP—that lack them. However, most of the programs that have baselines are not delivering capability on time, which means operators in the field are being asked to do their jobs without the tools they have been promised. Additionally, many of these programs are costing more than DHS leadership had approved, effectively decreasing DHS’s buying power and reducing the amount of capability the department will be able to afford in the future.

We recognize that DHS leadership is responsible for making difficult tradeoff decisions about deploying imperfect solutions, but these decisions should be informed by the most relevant knowledge available, and that was not always the case. DOT&E generally identified whether systems were operationally effective and suitable, but in several instances, DOT&E did not explicitly identify whether the systems could meet the key performance parameters that DHS leadership established were required to successfully meet the DHS mission. Presenting this information to DHS leadership when deployment decisions are being considered would better inform those decisions.

Within this generally challenging environment, we found that some specific problems have endured, including staffing shortfalls and funding gaps. DHS headquarters is actively working to improve its understanding of the staffing shortfalls and the affordability requirement established in June 2014 may help close the department’s acquisition funding gap. We found some other problems were specific to particular components, and it is less clear whether necessary steps are being taken to address those challenges. When program baselines, such as those from the two TSA programs, lack traceability over time, there is no clear way to determine whether promised capabilities are being delivered at the agreed upon cost. Additionally, the USCG’s continued reporting of incomplete information on its planned operations and maintenance funding means decision makers cannot have knowledgeable deliberations about affordability trade-offs. This impact is larger than USCG itself. Given that the 7 USCG programs we reviewed currently appear to account for more than 85 percent of the future funding needs for all 22 programs in our scope, this shortfall hinders DHS leadership’s ability to determine whether the department has realistic and achievable plans for delivering capabilities to front-line operators across all of DHS’s homeland security missions.
Recommendations for Executive Action

We are making the following three recommendations to help improve major acquisition outcomes at DHS:

- To improve how operational testing informs deployment authorizations, we recommend the Secretary of Homeland Security ensure DOT&E explicitly address all of the relevant key performance parameters in each letter of assessment appraising operational test results.

- To improve DHS’s management of major acquisition programs, we recommend the Secretary of Homeland Security ensure future baselines for all of TSA’s major acquisition programs capture the overall historical record of change.

- To more accurately communicate DHS’s funding plans for USCG’s major acquisition programs, we recommend the Secretary of Homeland Security ensure the funding plans presented to Congress in fiscal year 2015 are comprehensive and clearly account for all operations and maintenance funding DHS plans to allocate to each of the USCG’s major acquisition programs.

Agency Comments and our Evaluation

We provided a draft of this product to DHS for comment. In its written comments, reproduced in appendix III, DHS concurred with all three of our recommendations and provided estimated completion dates for each. DHS also provided technical comments that were incorporated, as appropriate.

We are sending copies of this report to congressional requesters and the Secretary of Homeland Security. In addition, the report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or mackinm@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 IV.
Michele Mackin
Director, Acquisition and Sourcing Management
List of Requesters

The Honorable Ron Johnson
Chairman
The Honorable Thomas R. Carper
Ranking Member
Committee on Homeland Security
and Governmental Affairs
United States Senate

The Honorable John Hoeven
Chairman
The Honorable Jeanne Shaheen
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
United States Senate

The Honorable Claire McCaskill
Ranking Member
Permanent Subcommittee on Investigations
Committee on Homeland Security
and Governmental Affairs
United States Senate

The Honorable Michael McCaul
Chairman
The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable John Carter
Chairman
The Honorable Lucille Roybal-Allard
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
House of Representatives
The Honorable Scott Perry  
Chairman  
The Honorable Bonnie Watson Coleman  
Ranking Member  
Subcommittee on Oversight and Management Efficiency  
Committee on Homeland Security  
House of Representatives  

The Honorable Jeff Duncan  
House of Representatives
Appendix I: Program Assessments

This appendix presents individual assessments for each of the 22 programs we reviewed. Each of these assessments is two pages, presents information current as of January 2015, and includes several standard elements, including an image provided by the program office, a brief program description, and a summary of the program’s progress in meeting its key performance parameters. Each assessment also includes four figures: Projected Funding vs. Estimated Costs, Program Office Staffing Profile, Schedule Changes over Time, and Cost Estimate Changes over Time.

For each program, the figure tracking how the program’s schedule has changed over time consists of two timelines. The first timeline is generally based on the initial baseline Department of Homeland Security (DHS) leadership approved after the department’s current acquisition policy went into effect in November 2008. Because these baselines were approved at different times, the first as-of date varies across programs, and in some cases, a program did not have a baseline approved as of January 2015. The second timeline identifies when that program expected to reach its major milestones as of January 2015 based on an update the program office provided when it commented on a draft of the assessment. The second timeline also identifies any new major milestones that were introduced after the initial baseline was approved, such as the date a new increment was scheduled to achieve initial operational capability, or the date the program was rebaselined.

The figure tracking how the program’s cost estimate has changed over time generally compares the program’s cost estimate in the initial baseline approved after DHS’s current acquisition policy went into effect to the program’s expected costs as of January 2015 based on an update the program office provided when it commented on a draft of the assessment. This figure also identifies how much funding had been appropriated to the program through fiscal year 2014 and how it compares to future funding needs.

Each program assessment also consists of a number of other sections depending on issues specific to each program. These sections may include: Program Governance, Acquisition Strategy, Program Execution, Test Activities, and Other Issues.
Lastly, each program’s assessment also presents the program office’s comments on the assessment, as well as GAO’s response, as necessary.
Appendix II: Objectives, Scope, and Methodology

The objectives of this audit were designed to provide Congress insights into the Department of Homeland Security’s (DHS) major acquisition programs. We assessed the extent to which DHS’s major acquisition programs (1) are on track to meet their schedules and cost estimates, (2) have successfully completed operational testing, and (3) are facing common issues department-wide. To answer these questions, we assessed all 14 of DHS’s Level 1 acquisition programs—those with life-cycle cost estimates of $1 billion or more—that had at least one project/increment/segment in the Obtain phase—the stage in the acquisition life cycle that program managers develop, test, and evaluate systems—at the initiation of our audit. Additionally, to provide insight into some of the factors that can lead to poor acquisition outcomes, we assessed 8 other major acquisition programs—those with life-cycle cost estimates of $300 million or more—that we or DHS leadership had identified were at risk of not meeting their cost estimates, schedules, or capability requirements. We have reported on many of these programs in our past work. As part of this scoping effort, we met with representatives from DHS’s Office of Program Accountability and Risk Management (PARM), DHS’s main body for acquisition oversight, to determine which programs were facing difficulties in meeting their cost estimates, schedules, or capability requirements. The 22 selected programs were sponsored by 8 different components, and they are identified in table 6, along with our rationale for selecting them.

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>Level 1 program in the Obtain phase at the initiation of our audit</th>
<th>At risk of not meeting cost estimates, schedule, or capability requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Customs and Border Protection (CBP)</td>
<td>Automated Commercial Environment (ACE)</td>
<td>YES</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Integrated FiYesed Towers (IFT)</td>
<td>No</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Land Border Integration (LBI)</td>
<td>YES</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Non-Intrusive Inspection (NII) Systems</td>
<td>YES</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Strategic Air and Marine Program (StAMP)</td>
<td>No</td>
<td>YES</td>
</tr>
<tr>
<td></td>
<td>Tactical Communications (TACCOM) Modernization</td>
<td>No</td>
<td>YES</td>
</tr>
</tbody>
</table>
## Appendix II: Objectives, Scope, and Methodology

<table>
<thead>
<tr>
<th>Component</th>
<th>Program</th>
<th>Level 1 program in the Obtain phase at the initiation of our audit</th>
<th>At risk of not meeting cost estimates, schedule, or capability requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>TECS (not an acronym) Modernization&lt;sup&gt;a&lt;/sup&gt;</td>
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<td>YES</td>
<td></td>
</tr>
<tr>
<td>Logistics Supply Chain Management System (LSCMS)&lt;sup&gt;a&lt;/sup&gt;</td>
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<td>YES</td>
<td></td>
</tr>
<tr>
<td>TECS (not an acronym) Modernization&lt;sup&gt;a&lt;/sup&gt;</td>
<td>No</td>
<td>YES</td>
<td></td>
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<tr>
<td>National Cybersecurity Protection System (NCPS)</td>
<td>YES</td>
<td>No</td>
<td></td>
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<tr>
<td>NeYest Generation Network – Priority Service (NGN-PS)</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Electronic Baggage Screening Program (EBSP)</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Passenger Screening Program (PSP)</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>C4ISR&lt;sup&gt;b&lt;/sup&gt;</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Fast Response Cutter (FRC)</td>
<td>No</td>
<td>YES</td>
<td></td>
</tr>
<tr>
<td>HH-65 Conversion/Sustainment Projects</td>
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<td>No</td>
<td></td>
</tr>
<tr>
<td>Long Range Surveillance Aircraft (HC-130H/J)</td>
<td>YES</td>
<td>No</td>
<td></td>
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<td>Medium Range Surveillance (MRS) Aircraft</td>
<td>YES</td>
<td>No</td>
<td></td>
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<tr>
<td>National Security Cutter (NSC)</td>
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<td>No</td>
<td></td>
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<tr>
<td>Offshore Patrol Cutter (OPC)</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
<tr>
<td>Transformation</td>
<td>YES</td>
<td>No</td>
<td></td>
</tr>
</tbody>
</table>

Source: GAO analysis of DHS documentation and data. [GAO-15-171SP](#)

<sup>a</sup> Level 2 program.

<sup>b</sup>C4ISR is an acronym for Command, Control, Communications, Computers, Intelligence, Surveillance, and Reconnaissance.

To determine the extent to which DHS’s major acquisition programs are on track to meet their schedules and cost estimates, for each of the 22 programs, we collected all acquisition documentation, including all program baselines, approved at the department level since DHS’s current acquisition policy went into effect in November 2008. A program baseline establishes a program’s critical cost, schedule, and performance parameters. DHS policy establishes that all major programs should have department-approved baselines before they initiate efforts to obtain new capabilities. Sixteen of the 22 programs had one or more department-approved baselines since November 2008, and we used these baselines to establish the initial cost estimates and schedules for these 16 programs. In July 2014, we collected updated cost and schedule information from DHS’s Next Generation Periodic Reporting System,
which is the department’s system for information on its major acquisition programs. We also developed a data collection instrument, pre-tested it with officials from select program offices, and subsequently used it to help validate the information from the baselines and the DHS system. Specifically, for each program, we pre-populated a data collection instrument to the extent possible with the cost and schedule information we had collected from the baselines and the DHS system, identifying cost growth and schedule slips, if any. For the six programs that lacked department-approved baselines, we were unable to identify whether there was any cost growth or schedule slips because we did not have an initial data point to compare to the cost and schedule information from the DHS system. We shared our data collection instruments with officials from the program offices and components to confirm or correct our initial analysis, and to collect additional information to enhance the timeliness and comprehensiveness of our data sets. We subsequently met with these officials to identify causes and effects associated with any cost growth and schedule slips. We also met with the individuals from PARM with lead responsibility for overseeing each of the 22 programs, and interviewed them to gain additional insights about the specific programs’ cost growth and schedule slips. Subsequently, we drafted preliminary assessments for each of the 22 programs, shared them with program and component officials, and gave these officials an opportunity to submit comments to help us correct any inaccuracies, which we accounted for as appropriate (such as when new information was available). Through this process, we determined that our data elements were sufficiently reliable for the purpose of this engagement.

To determine the extent to which DHS’s major acquisition programs have successfully completed operational testing, we collected all Test and Evaluation Master Plans (TEMP), approved by DHS’s Director of Operational Test and Evaluation (DOT&E), for each program. A program’s TEMP describes the developmental and operational testing needed to determine technical performance, operational effectiveness and suitability, and limitations. For each program, we also collected all of the letters of assessment issued by DOT&E. A letter of assessment communicates DOT&E’s appraisal of the adequacy of an operational test, a concurrence or non-concurrence with the operational test report’s conclusions, and any further independent analysis DOT&E conducted. We used the programs’ baselines, data collection instruments, and other documents to identify whether the programs had a project, increment, or segment in the Produce/Deploy/Support phase, which is the stage in the acquisition life cycle that DHS delivers new capabilities to operators, and the point by which the programs are generally required to conduct
operational testing per DHS acquisition policy. We then assessed the programs' letters of assessment to determine what system(s) were tested and when the testing was conducted. We also identified whether DOT&E deemed the system(s) operationally effective and suitable, and if not, whether the shortfall was with the test or the system(s). Finally, we assessed the letters of assessment to determine whether DOT&E explicitly measured the system(s) against key performance parameters, and if so, whether the system(s) met all of the relevant key performance parameters.\(^1\) We also applied criteria from DHS policy when assessing the letters of assessment. Additionally, we met with representatives from each of the 22 programs to confirm or clarify our preliminary findings, and to identify causes and effects associated with any testing shortfalls. We also met with DOT&E representatives with lead responsibility for overseeing each of the 22 programs' test activities to gain additional insights about these activities. Subsequently, we drafted preliminary assessments for each of the 22 programs, shared them with program and component officials, and gave these officials an opportunity to submit comments to help us correct any inaccuracies, which we accounted for as appropriate (such as when new information was available).

To determine the extent to which DHS's major acquisition programs are facing common issues department-wide, we interviewed PARM officials and DOT&E representatives, and representatives of each of the 22 programs in our scope. We specifically asked the officials to identify challenges that contributed to any cost growth, schedule slips, or poor test results. We also asked them to identify whether funding, workforce, and requirements issues we previously identified were enduring. Additionally, we collected each of the 22 programs' five-year funding plans as reported to Congress in the fiscal year 2014 Future Years Homeland Security Program report and compared them to yearly estimated funding needs, as identified in DHS's Next Generation Periodic Reporting System, to identify funding gaps. We also applied criteria from federal standards for internal control.\(^2\) We collected and assessed staffing data provided by PARM to identify staffing shortfalls. We reviewed all department-approved iterations of each program's baseline and used our

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\(^1\) Key performance parameters are the capability/system attributes or characteristics that are considered critical or essential, and are required to successfully meet the DHS mission.

\(^2\) GAO/AIMD-00-21.3.1.
data collection instruments to identify capability requirement changes. Subsequently, we drafted preliminary assessments for each of the 22 programs, shared them with program and component officials, and gave these officials an opportunity to submit comments to help us correct any inaccuracies, which we accounted for as appropriate. Finally, we analyzed the challenges from a component-specific perspective to determine if any challenges were particularly prevalent at particular components.

We conducted this performance audit from June 2014 to April 2015 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
Appendix III: Comments from the Department of Homeland Security

Michele Mackin
Director, Acquisition and Sourcing Management
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548


Dear Ms. Mackin:

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

The Department is pleased with GAO’s recognition that DHS is continuing to take steps to address challenges related to keeping DHS programs within cost and schedule parameters. As GAO acknowledges, DHS has already taken significant steps to improve acquisition management. These ongoing efforts highlight the Department’s commitment to better acquisition and resource management.

The draft report contained three recommendations with which the Department concurs. Specifically, GAO recommended:

**Recommendation 1:** Ensure DOT&E [DHS’s Director of Operational Test and Evaluation] explicitly address all of the relevant key performance parameters in each letter of assessment appraising operational test results.

**Response:** Concur. The DOT&E, as part of ongoing internal process reviews, has initiated a revision of the internal office procedure for the Letter of Assessment. Upon completion, a copy of the updated procedure will be provided to GAO. Estimated Completion Date (ECD): June 30, 2015.
Recommendation 2: Ensure future baselines for all of TSA’s [Transportation Security Administration’s] major acquisition programs capture the overall historical record of change.

Response: Concur. The TSA will begin incorporating an addendum to future Acquisition Program Baselines (APB) to capture and consolidate historical objective and threshold values for all program/project key performance parameters beginning with the initial program baseline and showing traceability of all interim approved versions to the current APB. This will provide a single source to show the changes to cost, schedule, and performance metrics. Projects that have been discontinued, completed, and/or started since the initial program baseline will be noted in the addendum for historical context. APBs will not be revised solely to include the addendum; however, if the APB requires a revision to re-baseline the program, then the addendum will be included as part of the submission. Effective May 1, 2015, the addendum will be incorporated into all new APBs submitted to DHS for approval. ECD: April 30, 2016.

Recommendation 3: Ensure the funding plans presented to Congress in fiscal year 2015 are comprehensive and clearly account for all operations and maintenance funding DHS plans to allocate to each of the USCG’s [United States Coast Guard’s] major acquisition programs.

Response: Concur. The USCG routinely tracks and accounts for operations and maintenance of new assets and will work to strengthen how this is incorporated in funding plans presented to Congress. Specifically, USCG and the DHS Chief Financial Officer will develop a plan to address this recommendation by September 30, 2015, then work together to fully implement the plan. ECD: March 31, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,

Jim H. Crumacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office
Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Michele Mackin, (202) 512-4841 or mackinm@gao.gov

Staff Acknowledgments

In addition to the contact named above, Katherine Trimble (Assistant Director), Nathan Tranquilli (Analyst-in-Charge), Peter Anderson, Mathew Bader, Robert Bullock, Lisa Canini, Virginia Chanley, Bruce Crise, Burns Eckert, Laurier R. Fish, Daniel Gordon, Yvette Gutierrez, Claire Li, Erin O’Brien, Alexis Olson, Megan Porter, Ashley Rawson, Sylvia Schatz, Lindsay Taylor, Ozzy Trevino, and Melissa Wohlgemuth made key contributions to this report.
Appendix V: Accessible Data

Agency Comment Letter

Text of Appendix III: Comments from the Department of Homeland Security

Page 1

April 10, 2015

Michele Mackin

Director, Acquisition and Sourcing Management

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

U.S. Department of Homeland Security

Washington, DC 20528

Homeland Security

Re: Draft Report GA0-15-171, "HOMELAND SECURITY ACQUISITIONS:

Major Program Assessments Reveal Actions Needed to Improve Accountability"

Dear Ms. Mackin:

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

The Department is pleased with GAO's recognition that DHS is continuing to take steps to address challenges related to keeping DHS programs within cost and schedule parameters. As GAO acknowledges, DHS has already taken significant steps to improve acquisition management. These ongoing efforts highlight the Department's commitment to better acquisition and resource management.

The draft report contained three recommendations with which the Department concurs. Specifically, GAO recommended:

Recommendation 1: Ensure DOT&E [DHS's Director of Operational Test and Evaluation] explicitly address all of the relevant key performance parameters in each letter of assessment appraising operational test results.

Response: Concur. The DOT&E, as part of ongoing internal process reviews, has initiated a revision of the internal office procedure for the Letter of Assessment. Upon completion, a copy of the updated procedure will be provided to GAO. Estimated Completion Date (ECD): June 30, 2015.

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Recommendation 2: Ensure future baselines for all of TSA’s [Transportation Security Administration’s] major acquisition programs capture the overall historical record of change.

Response: Concur. The TSA will begin incorporating an addendum to future Acquisition Program Baselines (APB) to capture and consolidate historical objective and threshold values for all program/project key performance parameters beginning with the initial program baseline and showing traceability of all interim approved versions to the current APB. This will provide a single source to show the changes to cost, schedule, and performance metrics. Projects that have been discontinued, completed, and/or started since the initial program baseline will be noted in the addendum for historical context. APBs will not be revised solely to include the addendum; however, if the APB requires a revision to re-baseline the program, then the addendum will be included as part of the submission. Effective May 1, 2015, the addendum will be incorporated into all new APBs submitted to DHS for approval.
Appendix V: Accessible Data


Recommendation 3: Ensure the funding plans presented to Congress in fiscal year 2015 are comprehensive and clearly account for all operations and maintenance funding DHS plans to allocate to each of the USCG’s [United States Coast Guard’s] major acquisition programs.

Response: Concur. The USCG routinely tracks and accounts for operations and maintenance of new assets and will work to strengthen how this is incorporated in funding plans presented to Congress. Specifically, USCG and the DHS Chief Financial Officer will develop a plan to address this recommendation by September 30, 2015, then work together to fully implement the plan. ECD: March 31, 2016.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,

Jim H. Crumpacker

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