



Testimony

Before the Subcommittee On Emergency
Preparedness, Response, and
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HOMELAND SECURITY

DHS's Chemical, Biological, Radiological, and Nuclear Program Consolidation Efforts

Statement of Chris Currie, Director Homeland Security
and Justice

Accessible Version

Highlights of [GAO-18-284T](#), a testimony before the Subcommittee on Emergency Preparedness, Response, and Communications, Committee on Homeland Security, House of Representatives.

Why GAO Did This Study

Chemical, biological, radiological, nuclear, and explosive weapons, also known as weapons of mass destruction (WMD), have the potential to kill thousands of people in a single incident. In 2013 Congress directed DHS to review its WMD programs, including the consolidation of CBRNE mission functions. DHS recently notified Congress that consolidation would begin in December 2017.

This testimony is based on GAO findings from an August 2016 report on (1) the extent to which DHS's CBRNE consolidation proposal assessed the benefits and limitations of consolidation and (2) GAO's key practices from past organizational transformations that could benefit the CBRNE consolidation effort. GAO reviewed DHS consolidation planning documents, interviewed relevant officials and obtained selected updated information on DHS planning efforts.

What GAO Recommends

GAO made two recommendations to DHS in 2016 to (1) complete, document, and make available analyses of key questions related to its consolidation proposal; and (2) use the key mergers and organizational transformation practices identified in GAO's previous work. DHS did not concur with the first recommendation and it was closed as not implemented. DHS concurred with the second recommendation and has not yet implemented it. GAO will continue to monitor DHS's efforts to address the second recommendation.

View [GAO-18-284T](#). For more information, contact Chris Currie at (404) 679-1875 or curriec@gao.gov

December 2017

HOMELAND SECURITY

DHS's Chemical, Biological, Radiological, and Nuclear, Program Consolidation Efforts

What GAO Found

GAO's prior work has shown that the Department of Homeland Security (DHS) should complete, document, and make available analyses of key questions related to its chemical, biological, radiological, nuclear, and explosives (CBRNE) consolidation proposal. In August 2016, we reported that several key factors were not included when DHS evaluated its organizational consolidation of CBRNE functions. For example, DHS did not fully assess and document potential problems that could result from consolidation or include a comparison of benefits and costs. Further, DHS conducted limited external stakeholder outreach, thus the proposal may not sufficiently account for stakeholder concerns. Attention to these key areas, identified from GAO's analysis of previous organizational consolidations, would help provide DHS, Congress, and other stakeholders, such as DHS components with assurance that important aspects of effective organizational changes are addressed as part of the agency's CBRNE reorganization decision-making process. GAO previously recommended that DHS complete, document, and make available analyses of key questions related to its consolidation proposal, including: (1) what problems, if any, consolidation may create; (2) a comparison of the benefits and costs the consolidation may entail; and (3) a broader range of external stakeholder input including a discussion of how it was obtained and considered. DHS did not concur, asserting that the recommendation did not acknowledge the extent to which these questions were discussed both internally within DHS and externally with Congress and that DHS's decision to consolidate CBRNE functions had already been made which would make additional analysis redundant. GAO closed this recommendation as not implemented. While GAO has not fully assessed DHS's most recent reorganization plans, GAO continues to believe that documenting information and analyses used to assess the benefits and limitations of its consolidation plan would assist DHS in fully demonstrating how its proposal will lead to an integrated, high-performance organization.

GAO's prior work found that key mergers and organizational transformation practices could further benefit DHS in its proposed CBRNE consolidation. GAO reported in July 2003 on key practices and implementation steps for mergers and organizational transformations that range from ensuring top leadership drives the transformation to involving employees in the implementation process to obtain their ideas and gain their ownership for the transformation. In August 2016, GAO recommended that DHS use key mergers and organizational transformation practices identified in GAO's previous work to help ensure that lessons learned from other reorganizations are considered during the consolidation effort. DHS concurred with the recommendation and stated in its October 2017 consolidation notice to Congress that it will consult the practices during consolidation implementation. GAO will monitor DHS's implementation of the key practices which will help to ensure that lessons learned from other organizations are considered during the consolidation effort.

Chairman Donovan, Ranking Member Payne, and Members of the Subcommittee:

Thank you for the opportunity to discuss the Department of Homeland Security's (DHS) plans to consolidate Chemical, Biological, Radiological, Nuclear, and Explosives (CBRNE) programs.

Chemical, biological, radiological, nuclear weapons, and explosives also known as weapons of mass destruction (WMD), have the potential to kill thousands of people in a single incident. Over the past 4 years, the United States has faced significant CBRNE threats to its national security. North Korea's weapons of mass destruction program, according to the *Quadrennial Defense Review 2014*, is a growing and direct threat to the United States.¹ Moreover, the use of chemical weapons in Syria in August 2013 and again in April 2017, and the emergence of nontraditional chemical agents highlighted the nation's potential vulnerability to chemical and biological attacks. Additionally, the spread of scientific knowledge and capabilities by state and nonstate actors to produce effective chemical and biological weapons further contributes to the nation's threats. According to the Department of Homeland Security's (DHS) 2014 *Quadrennial Homeland Security Review* report, chemical, biological, radiological, and nuclear threats are enduring areas of concern and the consequences of such attacks are potentially high even though the likelihood of their occurrence is relatively low.²

The organizational structure of DHS's CBRNE functions has been considered and questioned for some time. Specifically, as noted by the House committee report accompanying the fiscal year 2013 DHS appropriations bill, across the U.S. Government, departments and agencies have combined their WMD programs into more centralized offices.³ Consolidations such as the Federal Bureau of Investigation's (FBI) reorganization of its WMD-related activities into a single WMD Directorate within its National Security Branch are intended to unify

¹ DOD *Quadrennial Defense Review 2014* (Washington, D.C.: Mar. 4, 2014).

² DHS, *Quadrennial Homeland Security Review Report*, (Washington, D.C.: June 2014).

³ H.R. Rep. No. 112-492, at 12 (2012).

counterterrorism-related activities.⁴ To this end, Congress directed DHS to review and report on the Department's WMD programs, including potential consolidation of mission functions.⁵ DHS conducted its review, and in June 2015 provided a report of its findings to Congress, including a proposal to consolidate the agency's core CBRNE functions.

This testimony summarizes our August 2016 report, which discusses (1) the extent to which DHS's CBRNE consolidation proposal assessed the benefits and limitations of consolidation and (2) GAO's key practices from past organizational transformations that could benefit a CBRNE consolidation effort. This statement also focuses on recommendation follow-up activities related to the proposed CBRNE reorganization conducted through November 2017.⁶ In addition, we are conducting ongoing work for this Committee on DHS's efforts to address chemical terrorism, which may inform DHS's consolidation efforts. That report is expected to be issued early next year.

To perform the work for our previous report on DHS's CBRNE consolidation proposal, among other things, we reviewed DHS's *June 2015 Chemical, Biological, Radiological, and Nuclear Functions Review Report* and supporting documentation such as DHS's Analysis of CBRNE Organizational Alternatives, written testimony from DHS officials on CBRNE threats, DHS's fiscal year 2017 Budget-In-Brief and fiscal year 2017 Congressional Budget Justification. We also examined our prior work on identifying useful practices and lessons learned from major private and public sector mergers, acquisitions, and organizational transformations and compared it against available documentation related

⁴ Several different FBI investigative divisions once conducted WMD-related activities. In July 2006, the FBI consolidated its WMD investigation and prevention efforts into a WMD Directorate within its National Security Branch. Comprised primarily of Special Agents, Intelligence Analysts, program managers, and policy specialists, the WMD Directorate designs training for employees of the FBI; other federal agencies; state and local law enforcement organizations; and public health, industry, and academia partners. The WMD Directorate also provides national-level WMD intelligence support to FBI field divisions and to the larger U.S. intelligence community.

⁵ See Senate explanatory statement accompanying the Consolidated and Further Continuing Appropriations Act, 2013, Pub. L. No. 113-6, 127 Stat. 198 (2013), 159 Cong. Rec. S1547 (daily ed. Mar. 11, 2013)., See also H.R. Rep. No. 112-492, at 13-14 (2012).

⁶ GAO, *Homeland Security: DHS's Chemical, Biological, Radiological, Nuclear and Explosives Program Consolidation Proposal Could Better Consider Benefits and Limitations*, [GAO-16-603](#) (Washington, D.C.: Aug. 2016).

to DHS's consolidation planning efforts.⁷ Further details on the scope and methodology for the previously issued report are available within the published product. In addition, since the issuance of our August 2016 report through November 2017, we obtained updated information from DHS on actions taken to address our recommendations and additional steps taken to reorganize or consolidate CBRNE functions. However, we have not fully assessed all of DHS's efforts during this time.

We conducted the work on which this statement is based 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 the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

In June 2015, DHS delivered its CBRNE Functions Review Report to Congress which proposed consolidating the agency's core CBRNE functions (see fig. 1), into a new Office of CBRNE Defense.

⁷ GAO, *Streamlining Government: Questions to Consider When Evaluating Proposals to Consolidate Physical Infrastructure and Management Functions*, GAO-12-542 (Washington, D.C.: May 2012).

Figure 1: Department of Homeland Security (DHS) Components with Chemical, Biological, Radiological, Nuclear and Explosives (CBRNE) Responsibilities, as of June 2016

Domestic Nuclear Detection Office (DNDO)

- Develop the global nuclear detection and reporting architecture.
- Develop, acquire, and support the domestic nuclear detection and reporting system.
- Characterize detector system performance before deployment.
- Facilitate situational awareness through information sharing and analysis.
- Establish operational protocols to ensure detection leads to effective response.
- Conduct a transformational research and development program.
- Provide centralized planning, integration, and advancement of U.S. government nuclear forensics program.

National Protection and Programs Directorate, Office of Bombing Prevention (OBP)

- The mission of OBP is to protect life and critical infrastructure by building capabilities within the general public and across the public and private sectors to prevent, protect against, respond to, and mitigate bombing incidents.
- Coordinate national and intergovernmental counter-improvised explosive devices (IED) efforts.
- Conduct capabilities analysis and planning support.
- Coordinate information sharing and decision support.
- Conduct counter-IED training and awareness.

Office of Health Affairs (OHA)

- Monitor for dangerous biological agents.
- Analyze data for early signs of chemical and biological threats and plan responses to pandemics.
- Work closely with DHS professionals on the frontlines to keep them healthy and safe.
- Help DHS officials coordinate medical resources and understand health and medical risks during incidents.

Science and Technology Directorate, Chemical and Biological Defense Division (S&T)

- Address chemical and biological threats through comprehensive research, development, testing and evaluation efforts.
- Work with industry, academia, national laboratory and federal partners to develop technologies, systems, and knowledge products to increase national preparedness in threat awareness, biosurveillance, detection and diagnostics, and response and recovery.
- Conduct, analyze, and disseminate chemical and biological risk assessments.

Office of Policy (PLCY)

- Develop, coordinate, facilitate, and evaluate the effectiveness of policies and programs related to countering chemical, biological, radiological, and nuclear threats.
- Scope of the office's work ranges across the spectrums of awareness, prevention, protection, response, and recovery.

Office of Operations Coordination (OPS)

- Employ all department resources to translate intelligence and policy into action.
- Oversee the National Operations Center (NOC) which collects and fuses information from more than 35 federal, state, territorial, tribal, and local agencies, along with the private sector and international partners.

Source: GAO summary of DHS information. | GAO-18-284T

Note: In accordance with section 709 of the Homeland Security Act of 2002, as amended by the National Defense Authorization Act for Fiscal Year 2017, DHS's Office of Policy is now the DHS Office of Strategy, Policy, and Plans. See Pub. L. No. 114-328, § 1902, 130 Stat. 2000, 2670-72 (2016); 6 U.S.C. § 349.

According to DHS officials, the agency's proposal to consolidate its CBRNE functions adopts the primary recommendation from a previous DHS study on CBRNE consolidation conducted in 2013. At that time, DHS assembled a review team to evaluate CBRNE alignment options and produced a report on its findings for the Secretary of Homeland Security. According to DHS officials, the alignment options from the 2013

report were updated in 2015 based on the Secretary's Unity of Effort Initiative, to include transferring CBRNE threat and risk assessment functions from the DHS Science and Technology Directorate (S&T) to the proposed CBRNE Office, as well as including the DHS Office for Bombing Prevention from the National Protection and Programs Directorate.

Since we reported on consolidation efforts in August 2016, DHS has provided notification to Congress of its plan to consolidate certain chemical, biological, radiological, and nuclear (CBRN) functions pursuant to the Secretary's authority under the Homeland Security Act of 2002 to reorganize functions of the department.⁸ Specifically, in October 2017 DHS's Acting Secretary issued a memo notifying congress that DHS plans to reorganize its CBRN functions, including workforce health and medical support functions into a Countering Weapons of Mass Destruction (CWMD) office.⁹ According to the memo, DHS intends to consolidate the following functions into a CWMD Office, headed by an Assistant Secretary who will report directly to the Secretary of DHS: (1) the Domestic Nuclear Detection Office (DNDO) in its entirety; (2) the Office of Health Affairs (OHA), with the exception of workforce health and medical support functions; (3) chemical and biological defense expertise from the DHS Office of Strategy, Policy, and Plans (PLCY) and the Office of Operations Coordination (OPS); and (4) certain non- Research and

⁸ See Pub. L. No. 107-296, § 872, 116 Stat. 2135, 2243 (2002); 6 U.S.C. § 452. At the time of our August 2016 report, a bill had been pending before Congress that would have established within DHS a Chemical, Biological Radiological, Nuclear and Explosives Office. See H.R. 3875, 114th Cong. (1st Sess. 2015). Although passed by the House of Representatives and referred to the Senate Committee on Homeland Security and Governmental Affairs, the bill was not enacted into law. A more recent bill passed by the House of Representatives and referred to the Senate Committee on Homeland Security and Governmental Affairs—the DHS Authorization Act—would require the Secretary of DHS to, among other things, assess the organization and management of the department's CBRNE activities and submit a proposed organizational structure to ensure enhanced coordination, effectiveness, and efficiency by providing strengthened CBRNE capabilities in support of homeland security. See H.R. 2825, 115th Cong. (1st Sess. 2017).

⁹ During an initial review of CBRNE functions at DHS, agency officials determined that DHS's Office of Bombing Prevention should be included within the WMD consolidation option. As such, we use CBRNE to denote the inclusion of explosives functions covered by DHS Office of Bombing Prevention. Subsequent DHS consolidation planning does not include OBP, so we refer to the consolidation as CBRN, where appropriate.

Development (R&D) functions from S&T. According to the memo, the reorganization will take effect on December 5, 2017.¹⁰

DHS Considered Several Key Factors, but Had Limited Analyses and Documentation Underlying the Benefits and Limitations of Its CBRNE Consolidation Proposal

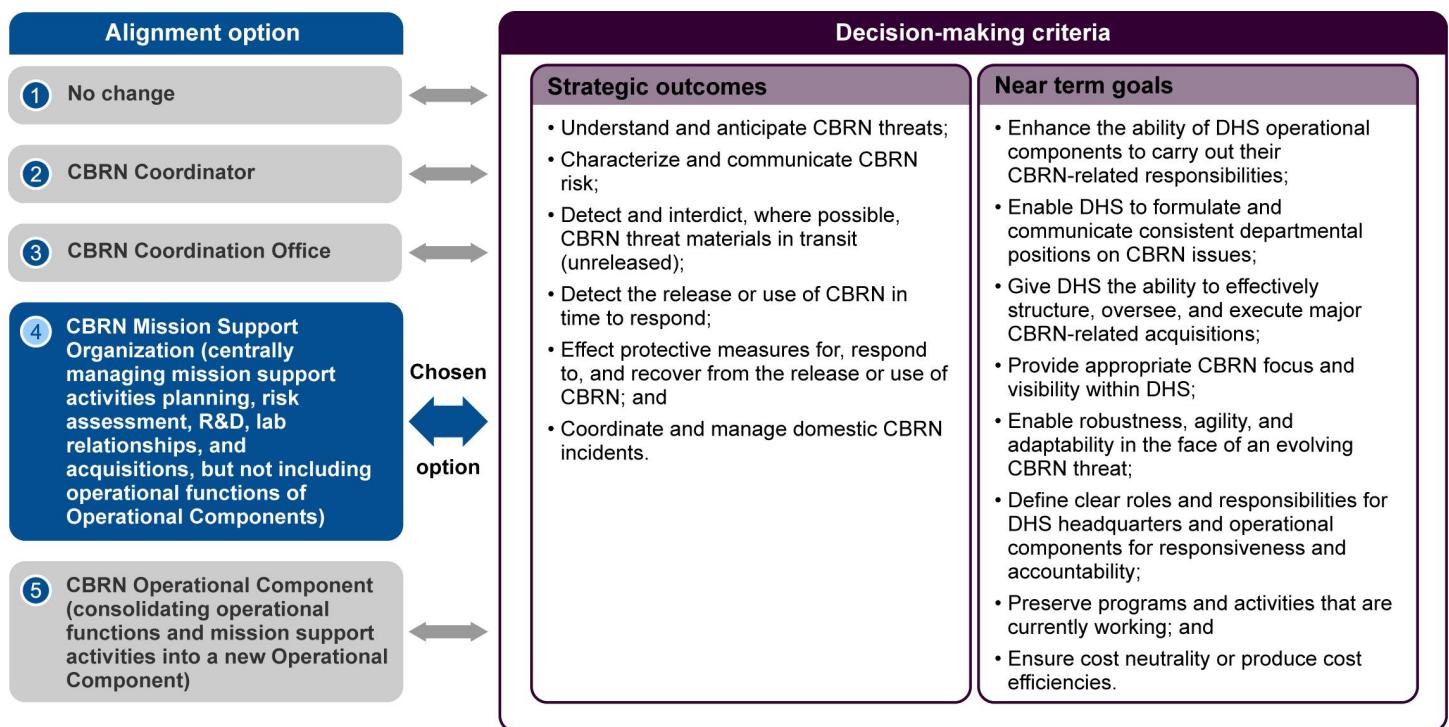
In August 2016, we found that DHS's June 2015 CBRNE report and related summaries provide some insights into factors considered for its consolidation proposal, but did not include associated underlying data or methodological information, such as how benefits and costs were compared or the extent to which stakeholders were consulted. According to DHS officials, DHS could not locate the underlying information associated with analyses that informed the consolidation proposal due to staff turnover. Without such underlying documentation, we could not fully determine the extent to which DHS considered the benefits and limitations of a CBRNE consolidation as part of its decision-making process.

According to DHS's June 2015 CBRNE report and the summary documents provided to us during our previous review, the department developed decision-making criteria, identified as "desired outcomes" and "near-term goals" for its proposed reorganization, and consulted with DND, OHA, S&T and leadership of other DHS components, the Office of Management and Budget (OMB) and National Security Council Staff. Also as we reported in August 2016, an official from DHS's Office of Policy stated that DHS consulted with the Executive Office of the President as well as Congressional staff on its consolidation plan. DHS considered five alignment options, as shown in figure 2, and provided a

¹⁰ In accordance with section 709 of the Homeland Security Act of 2002, as amended by the National Defense Authorization Act for Fiscal Year 2017, what was the DHS Office of Policy at the time we issued the August 2016 report is now the DHS Office of Policy is now the DHS Office of Strategy, Policy, and Plans. See Pub. L. No. 114-328, § 1902, 130 Stat. 2670-72 (2016); 6 U.S.C. § 349.

general assessment of the effects of reorganization on its CBRNE mission.¹¹

Figure 2: Department of Homeland Security's (DHS) Chemical, Biological, Radiological, Nuclear and Explosives (CBRNE) Alignment Options and Decision-Making Criteria



Source: GAO. | GAO-18-284T

In May 2012, we identified key questions for agency officials to consider when evaluating an organizational change that involves consolidation.¹² Table 1 provides a summary of the key questions for evaluating

¹¹ In accordance with section 709 of the Homeland Security Act of 2002, as amended by the National Defense Authorization Act for Fiscal Year 2017, DHS's Office of Policy is now the DHS Office of Strategy, Policy, and Plans. See Pub. L. No. 114-328, § 1902, 130 Stat. 2000, 2670-72 (2016); 6 U.S.C. § 349.

¹² In order to determine the key questions to consider when evaluating physical infrastructure and management function consolidation initiatives, we identified and reviewed both GAO reports on specific consolidation initiatives that have been undertaken and relevant literature on public-sector consolidations. Further, we reviewed selected consolidation initiatives at the federal agency level to gain insights into how agencies addressed these key questions representing both inter- and intra-agency activity. [GAO-12-542](#).

consolidation proposals from this previous work and a summary of our previous assessment of whether documentation provided to us and interviews with agency officials indicated whether each question was addressed.¹³

Table 1: Key Questions from GAO's Prior Work on Evaluating Consolidation Proposals and Our Assessment

Key questions	Addressed in the Department of Homeland Security's chemical, biological, radiological, nuclear and explosives (CBRNE) consolidation decision-making process?
What are the goals of the consolidation? What opportunities will be addressed through the consolidation and what problems will be solved? What problems, if any, will be created?	Partially
What will be the likely benefits and costs of the consolidation? Are sufficiently reliable data available to support a business-case analysis or cost-benefit analysis?	No
How can the up-front costs associated with the consolidation be funded?	Partially
Who are the consolidation stakeholders and how will they be affected? How have the stakeholders been involved in the decision, and how have their views been considered? On balance, do stakeholders understand the rationale for consolidation?	Partially

Source: GAO-12-542.

We found in our August 2016 report that DHS's June 2015 report to Congress and the supporting documentation we reviewed included an evaluation of some, but not all, key questions listed above in Table 1. These questions are important to consider when evaluating an organizational change that involves consolidation. Specifically, we found that DHS's consolidation proposal:

- Identified strategic outcomes and goals and considered problems to be solved, but did not fully assess and document potential problems that could result from consolidation.
- Did not conduct and document a comparison of benefits and costs. While Congress directed DHS to include an assessment of whether consolidation could produce cost savings, DHS had not documented a comparison of benefits and costs for its consolidation plan.

¹³ Our prior work on key questions for evaluating consolidation proposals includes a fifth key question related to change management practices which asks "To what extent do plans show that change management practices will be used to implement the consolidation?" A discussion related to change management practices during an organizational transformation follows later in this report. We therefore did not include the fifth key question in this table.

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- Did not fully identify or document consideration of up-front costs. DHS considered potential up-front costs associated with a CBRNE consolidation, but did not document these costs or how they were considered during the reorganization decision-making process.¹⁴
 - Conducted limited external stakeholder consultations. DHS conducted limited external stakeholder outreach in developing the consolidation proposal, and thus the proposal may not sufficiently account for stakeholder concerns.

As a result of these findings, we recommended that DHS complete, document, and make available analyses of key questions related to its consolidation proposal, including:

- what problems, if any, consolidation may create;
- a comparison of the benefits and costs of consolidation; and
- a broader range of external stakeholder input including a discussion of how it was obtained and considered.

DHS did not concur with this recommendation, asserting, among other things, that our recommendation did not acknowledge the extent to which these questions were discussed both internally within DHS and externally with Congress and that DHS's decision to consolidate CBRNE functions had already been made which would make additional analysis redundant. However, as we stated in our August 2016 review, in 2013, Congress had directed DHS to include an assessment of whether consolidation could produce cost savings. However, as of our 2016 report DHS had not documented a comparison of the benefits and costs for its consolidation plan. While we have not fully assessed DHS's most recent reorganization plans and any additional analyses conducted, we continue to believe that providing documented information and analyses used to assess the benefits and limitations of its consolidation plan would assist DHS in fully demonstrating how its proposal will lead to an integrated, high-performance organization. We closed this recommendation as not implemented upon receiving documentation from DHS in November 2016 stating that they did not intend to address it.

¹⁴ The President's fiscal year 2017 budget submission for DHS included the CBRNE reorganization; however, the budget submission for the proposed CBRNE office did not indicate whether any of the costs in the submission include up-front costs associated with the implementation of the consolidation.

Key Mergers and Organizational Transformation Practices Could Benefit DHS's CBRN Consolidation Implementation

As we found in our August 2016 report, when implementing a CBRNE consolidation effort DHS could benefit from incorporating change management approaches such as the key practices and implementation steps derived from organizational transformations undertaken by large private and public sector organizations identified in our previous work.¹⁵ Doing so would help ensure that DHS's consolidation initiative is results oriented, customer focused, and collaborative in nature. The Consolidated Appropriations Act, 2016, provided that none of the funds appropriated the fiscal year 2016 Act or any previous appropriations Acts may be used to establish an Office of CBRNE Defense until Congress authorized such establishment and, as of the end of fiscal year 2016, Congress had not approved the proposed consolidation.¹⁶ As a result of this restriction, DHS officials told us at the time of our August 2016 report that they had taken few concrete steps to plan for or move forward with the consolidation. As described earlier, DHS subsequently provided notification to Congress in October 2017 of its plan to consolidate certain CBRN functions pursuant to its reorganization authorities provided under the Homeland Security Act of 2002.

As DHS was formed, we reported in July 2003 on key practices and implementation steps for mergers and organizational transformations.

¹⁵ GAO-12-542, GAO-03-669.

¹⁶ See Pub. L. No. 114-113, div. F, § 521, 129 Stat. 2242, 2515 (2015) (providing further, however, that the Secretary may transfer funds for the purposes of executing authorization of the Office of Chemical, Biological, Radiological, Nuclear and Explosives Defense). The Consolidated Appropriations Act, 2017, did not contain a provision precluding DHS from utilizing appropriated funds for the establishment of such an office. See Pub. L. No. 115-31, div. F, 131 Stat. 135, 404 (2017).

The factors listed in Table 2 were built on the lessons learned from the experiences of large private and public sector organizations.¹⁷

Table 2: Key Practices and Implementation Steps for Mergers and Organizational Transformation

Practice	Implementation Step
Ensure top leadership drives the transformation.	<ul style="list-style-type: none"> Define and articulate a succinct and compelling reason for change. Balance continued delivery of services with merger and transformation activities.
Establish a coherent mission and integrated strategic goals to guide the transformation.	<ul style="list-style-type: none"> Adopt leading practices for results-oriented strategic planning and reporting.
Focus on a key set of principles and priorities at the outset of the transformation.	<ul style="list-style-type: none"> Embed core values in every aspect of the organization to reinforce the new culture.
Set implementation goals and a timeline to build momentum and show progress from day one.	<ul style="list-style-type: none"> Make public implementation goals and timeline. Seek and monitor employee attitudes and take appropriate follow-up actions. Identify cultural features of merging organizations to increase understanding of former work environments. Attract and retain key talent. Establish an organization-wide knowledge and skills inventory to exchange knowledge among merging organizations.
Dedicate an implementation team to manage the transformation process.	<ul style="list-style-type: none"> Establish networks to support implementation team. Select high-performing team members.
Use the performance management system to define responsibility and assure accountability for change.	<ul style="list-style-type: none"> Adopt leading practices to implement effective performance management systems with adequate safeguards.
Establish a communication strategy to create shared expectations and report related progress.	<ul style="list-style-type: none"> Communicate early and often to build trust. Ensure consistency of message. Encourage two-way communication. Provide information to meet specific needs of employees.

¹⁷ To identify these practices, we interviewed a cross section of leaders with experience managing large-scale organizational mergers, acquisitions, and transformations, as well as academics and others who have studied these efforts. We asked these individuals about their experiences managing mergers, acquisitions, and transformations and reviewed literature on the subject drawn primarily from private sector mergers and acquisitions change management experiences to gain a better understanding of the issues that most frequently occur during such large-scale change initiatives. We also used our guidance and reports on strategic human capital management and results-oriented management.

Practice	Implementation Step
Involve employees to obtain their ideas and gain their ownership for the transformation.	<ul style="list-style-type: none">• Use employee teams.• Involve employees in planning and sharing performance information.• Incorporate employee feedback into new policies and procedures.• Delegate authority to appropriate organizational levels.
Build a world-class organization.	<ul style="list-style-type: none">• Adopt leading practices to build a world-class organization.

Source: [GAO-03-669](#).

The practices outlined in our July 2003 report are intended to help agencies transform their cultures so that the federal government has the capacity to deliver its promises, meet current and emerging needs, maximize its performance, and ensure accountability. We found in our August 2016 report that DHS had not evaluated each of these practices. According to DHS officials, the agency was awaiting congressional approval of the proposed consolidation before developing implementation steps. We recommended that if DHS's proposed CBRNE program consolidation is approved by Congress, DHS use, where appropriate, the key mergers and organizational transformation practices identified in our previous work to help ensure that a CBRNE consolidated office benefits from lessons learned from other organizational transformations. DHS concurred with the recommendation and stated in a November 2016 letter to members of Congress that while DHS's CBRNE reorganization proposal had yet to be authorized by Congress, DHS remained committed to evaluating GAO's identified practices when evaluating its proposals. DHS acknowledged in its October 2017 memo to Congress that it plans to address this recommendation as part of its CBRN consolidation efforts by working with entities both internal and external to DHS to determine where it is appropriate to apply our key organization transformation practices.

Given the critical nature of DHS's CBRN mission, considering key factors from our previous work would help inform a consolidation effort. The lessons learned by other organizations involved in substantial transformations could provide key insights for agency officials if they implement reorganization and attention to the factors we identified would improve the chances of a successful CBRN consolidation.

Chairman Donovan, Ranking Member Payne, and members of the subcommittee, this completes my prepared statement. I would be happy to respond to any questions you may have at this time.

GAO Contacts and Staff Acknowledgments

If you or your staff members have any questions about this testimony, please contact me at (404) 679-1875 or curriec@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Other individuals making key contributions to this work include Ben Atwater, Assistant Director; John Mortin, Assistant Director; Imoni Hampton, Analyst-in-Charge; Landis Lindsey, Tom Lombardi and Sarah Veale.

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