

# GAO Highlights

Highlights of [GAO-19-122](#), a report to congressional requesters

## Why GAO Did This Study

FPS, within DHS's NPPD, conducts physical security and law enforcement activities for about 9,000 federal facilities and the millions of employees or visitors who work in or visit these facilities. FPS moved from GSA to DHS's ICE in 2003 and to NPPD in 2009. GAO has reported that FPS faced challenges in each location. Legislation enacted in November 2018 requires DHS to review placement options for FPS and could result in FPS moving again within DHS or to another executive branch agency.

GAO was asked to review issues related to organizational placement options for FPS. This report examines (1) the potential effects of FPS's placement in selected agencies and (2) steps DHS has taken to assess placement options for FPS. GAO identified five key organizational placement criteria based on prior work and identified eight agencies as potential placement options. The agencies were selected because they have the largest number of law enforcement officers or perform physical security, among other reasons. GAO reviewed documentation and interviewed officials from FPS, selected agencies, and key stakeholders. GAO compared agencies to FPS to determine if they meet the organizational placement criteria. An agency meets the criteria if it has similarities to FPS.

## What GAO Recommends

DHS should identify the expectations for changing FPS's placement and take steps to fully evaluate placement options. DHS concurred with the recommendations and outlined steps it plans to take to address them.

View [GAO-19-122](#). For more information, contact Lori Rectanus at (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov).

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# FEDERAL PROTECTIVE SERVICE

## DHS Should Take Additional Steps to Evaluate Organizational Placement

### What GAO Found

In considering organizational placement options for the Department of Homeland Security's (DHS) Federal Protective Service (FPS), GAO found that none of the eight agencies GAO selected met all the key organizational placement criteria; thus, any of the organizational placement options could result in both benefits and trade-offs. For example, keeping FPS in DHS's National Protection and Programs Directorate (NPPD) could provide FPS some benefits because FPS and NPPD have missions that include the protection of infrastructure or specific facilities, facility protection responsibilities, and access to and sharing of information related to national homeland security. However, unlike FPS, NPPD does not perform both physical security and law enforcement activities, which is a potential trade-off. In another example, the General Services Administration (GSA) and the United States Marshals Service (Marshals) could provide benefits because they currently coordinate with FPS on facility protection. However, Marshals does not have a mission or goals that explicitly focus on the protection of infrastructure or facilities and GSA does not perform law enforcement, which are potential trade-offs.

### Comparison of Selected Agencies and the Federal Protective Service (FPS) to Three Key Criteria for Organizational Placement

The eight selected agencies are the Department of Homeland Security (DHS); U.S. Customs and Border Protection (CBP); U.S. Immigration and Customs Enforcement (ICE); National Protection and Programs Directorate (NPPD); United States Secret Service (USSS); General Services Administration (GSA); Department of Justice (Justice); and the U.S. Marshals Service (Marshals). GAO assumed that FPS would be a standalone entity in DHS, GSA, or Justice. At the end of GAO's review, in November 2018, NPPD was renamed the Cybersecurity and Infrastructure Security Agency. For this report, GAO continues to refer to this agency as NPPD.

#### Three selected key criteria for evaluating organizational placement



Mission, goals, and objectives

#### Selected agencies that met the key criteria

DHS  
NPPD  
USSS  
GSA

These agencies are similar to FPS in that their mission statements or goals include an explicit focus on the protection of infrastructure or specific facilities.<sup>a</sup>

#### Selected agencies that did not meet the key criteria

CBP  
ICE  
Justice  
Marshals

These agencies do not have missions or goals that focus explicitly on infrastructure or facility protection.



Responsibilities

#### Facility protection responsibilities

DHS  
CBP  
NPPD  
USSS  
GSA  
Justice  
Marshals

Similar to FPS, DHS, nearly all of the selected agencies within DHS, GSA, Justice, and the Marshals have facility protection responsibilities.

ICE

ICE does not have any facility protection responsibilities because it pays FPS to protect its facilities.

Three selected key criteria for evaluating organizational placement	Selected agencies that met the key criteria	Selected agencies that did not meet the key criteria
<i>Physical security and law enforcement activities</i>		
	DHS CBP USSS Justice Marshals These agencies are similar to FPS because they perform both physical security and law enforcement activities.	ICE NPPD GSA These agencies perform either physical security or law enforcement activities, but not both.
<i>Contract guard responsibilities</i>		
	Marshals Marshals, like FPS, employ and oversee a large number of contract guards.	DHS CBP ICE NPPD USSS GSA Justice These agencies use FPS's contract guards, procure a limited number of guards, or use their own federal officers for facility protection.
<i>Information sharing</i>		
	DHS CBP ICE NPPD USSS Justice Marshals DHS, all of the selected agencies in DHS, Justice and the Marshals, like FPS, have access to and can share information related to national homeland security.	GSA GSA does not have access to information related to national homeland security. However, GSA has access to information pertinent to the security of government facilities.
<i>Coordination of activities</i>		
	GSA Justice Marshals GSA and FPS have joint responsibility for protecting facilities, and these two agencies and Marshals have joint responsibility for protecting courthouses.	DHS CBP ICE NPPD USSS These agencies do not have joint responsibilities for coordinating facility protection with FPS.

Source: GAO analysis of agency documents and interviews with stakeholders; GAO (images). | GAO-19-122

Note: The organizational culture and mission support criteria are discussed in the report.

<sup>a</sup> GSA has a statutory facility protection mission. See, e.g., 6 U.S.C. § 232(a).

DHS has not taken key steps to fully assess potential placement options. Specifically, DHS has not assessed the organizational structure of FPS, such as its placement in NPPD, even though FPS and NPPD have evolved since FPS was placed in NPPD in 2010. *Standards for Internal Control* state that agency management should establish an organizational structure to achieve the agency's objectives and that an effective management practice for attaining this outcome includes periodically evaluating the structure to ensure that it has adapted to changes. Additionally, because DHS did not analyze FPS's current placement in NPPD, DHS does not have a benchmark for comparison to other agencies. DHS recently established a working group to assess the placement of FPS. However, the group's planned activities are limited in several ways. For example, the group's draft charter does not indicate that the working group will describe what DHS expects to achieve by changing FPS's placement. Further, the draft charter does not indicate that the working group will evaluate the benefits and trade-offs of placement options. GAO has previously identified these and other steps as key to successful organizational change or analysis of alternatives. These steps would help DHS address the 2018 legislation to review placement options for FPS—including, how DHS considered the results of GAO's review. Regardless of the legislation, DHS may not be positioning itself to make an informed decision as to what organization best supports FPS.