



February 2020

# COAST GUARD

## Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs

# GAO Highlights

Highlights of [GAO-20-223](#), a report to congressional requesters

## Why GAO Did This Study

The Coast Guard is a multi-mission maritime military service responsible for maritime safety, security, and environmental protection, among other things. Since 2006 the Coast Guard has implemented organizational changes to improve its effectiveness and efficiency. During this time, the Coast Guard also created a workforce assessments process to determine the number of personnel and skills required to meet mission needs. In April 2018, the Coast Guard reported to Congress that it was operating below the workforce necessary to meet its mission needs.

GAO was asked to review the status of the Coast Guard's modernization and workforce assessment efforts. Among other things, this report examines the extent to which the Coast Guard (1) applied key practices for agency reorganization and (2) has assessed its workforce needs. GAO analyzed Coast Guard documents used to plan and implement its modernization effort against GAO key practices for agency reorganization. GAO also analyzed Coast Guard workforce assessments and data from 2003 through 2019. GAO also reviewed policy and planning documents and interviewed Coast Guard officials.

## What GAO Recommends

GAO is making six recommendations, including that the Coast Guard measure progress in achieving the goal of modernization, update a plan with time frames and milestones for completing its workforce assessment goal, and obtain information on the resources needed to meet its goal. DHS concurred with our recommendations.

View [GAO-20-223](#). For more information, contact Nathan Anderson at (202) 512-3841 or [andersonn@gao.gov](mailto:andersonn@gao.gov).

February 2020

# COAST GUARD

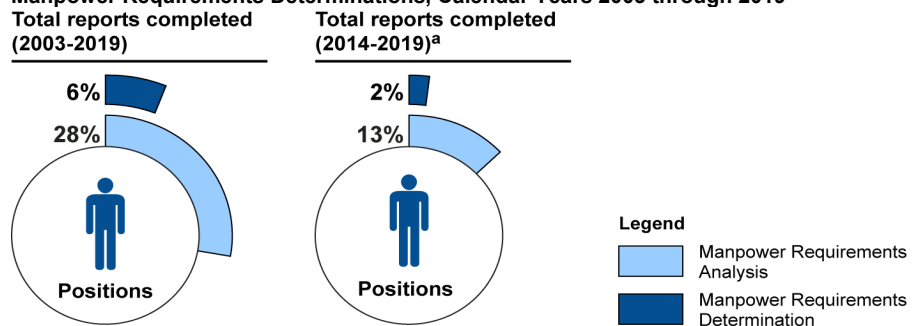
## Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs

### What GAO Found

The U.S. Coast Guard (Coast Guard) realigned its mission planning and mission support functions through an effort known as "modernization," but did not consistently apply key practices for agency reorganization in implementing the effort. Of seven key practices, the Coast Guard did not apply two and partially applied three. For example, the Coast Guard did not measure its progress in achieving the goal of modernization, as key practices recommend. Coast Guard documents for organizational change and associated guidance do not require such practices to be followed. By ensuring such practices are implemented, the Coast Guard will be better positioned to determine the extent to which its investments meet modernization's goal of improving effectiveness and efficiency.

Although the Coast Guard has informed Congress that it needs to increase its workforce, it has assessed a small portion of its workforce needs. Its preferred tool for assessing workforce needs is its manpower requirements determination process, which includes manpower requirements analyses (MRA) and is completed with a manpower requirements determination (MRD). Coast Guard guidance states that MRAs are to be updated every 5 years, and according to its April 2018 Manpower Requirements Plan, the Coast Guard's goal is to complete MRDs for all of its 58,000 personnel and 158 unit types. However, the Coast Guard had completed MRAs for 13 percent of its workforce and MRDs for 2 percent over the past 5 calendar years (see figure).

**Share of U.S. Coast Guard Workforce Supported by Manpower Requirements Analyses and Manpower Requirements Determinations, Calendar Years 2003 through 2019**



Source: GAO analysis of U.S. Coast Guard reports. | GAO-20-223

Note: The U.S. Coast Guard (Coast Guard) began implementing the manpower requirements determination process in 2003.

<sup>a</sup>Coast Guard guidance states that manpower requirements analyses should be updated every 5 years. This shows the share of analyses and associated determinations the Coast Guard completed within the past 5 years, in accordance with its guidance.

The Coast Guard's plan does not include time frames and milestones for how it will achieve its workforce assessment goal, and information on the resources it needs to complete MRDs for all positions and units has not been updated in 10 years. By updating its plan to complete manpower requirements determinations and obtaining information on the resources needed to achieve its workforce assessment goal, the Coast Guard will be better positioned to ensure that it has the right number of people with requisite skills in the right units to meet its mission demands and to inform Congress of its manpower needs.

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## Abbreviations

U.S. Coast Guard	Coast Guard
DHS	Department of Homeland Security
FORCECOM	Force Readiness Command
MRA	Manpower Requirements Analysis
MRD	Manpower Requirements Determination

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February 26, 2020

The Honorable Sam Graves  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The Honorable John Garamendi  
House of Representatives

The U.S. Coast Guard (Coast Guard), a multi-mission, maritime military service within the Department of Homeland Security (DHS), serves as the principal federal agency responsible for maritime safety, security, and environmental stewardship. Composed of approximately 58,000 personnel, the Coast Guard is to protect and defend more than 100,000 miles of U.S. coastline and inland waterways, and safeguard an economic region covering 4.5 million square miles. In addition, the Coast Guard serves as a first responder and humanitarian service that provides aid to people in distress or affected by natural and man-made disasters whether at sea or on shore.

Since the terrorist attacks of 9/11, the Coast Guard has been charged with additional security-related mission responsibilities. In addition, the growing frequency of natural disasters and growth in commercial maritime activity has increased demands on the Coast Guard's longstanding mission responsibilities. The effect of these additional missions and increased demands underscore the importance for the Coast Guard to identify its resource needs, including the assets (vessels and aircraft) it needs to carry out its missions and the workforce to operate and maintain them. In April 2018, the Coast Guard reported to Congress that it faced challenges meeting its daily mission demands because it was operating below the workforce level necessary to meet all of its mission requirements.

The Coast Guard has implemented initiatives over the past 2 decades to improve its ability to meet its increased mission demands, such as its multibillion-dollar recapitalization effort to acquire a new fleet of aircraft and vessels. During this time, the Coast Guard has undertaken other key efforts to support its ability to meet its increased mission demands. These have included an effort known as "modernization," which realigned its organizational structure, and creation of a process to conduct workforce assessments to determine the number and type of personnel required to

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meet mission needs. In 2009 and 2010, we issued reports on the status of modernization. We noted that it was too soon to assess its effects and that as the Coast Guard continued to implement its new organizational structure, it should develop ways to measure the effects of its organizational changes to determine whether modernization met its intended benefits of creating a more effective and efficient Coast Guard.<sup>1</sup>

You requested that we review the status of modernization and the Coast Guard's progress in implementing its new organizational structure and assessing its workforce needs. This report examines (1) how the Coast Guard modernized its organization and the extent to which it has applied key reform practices to its organizational change efforts and (2) the extent to which the Coast Guard has assessed its workforce needs.

To address both objectives we reviewed agency documents and prior GAO reports related to organizational realignment, Coast Guard organizational changes, Coast Guard assessment of resources, and relevant high-risk issues in the federal government such as workforce planning.<sup>2</sup> We also interviewed cognizant officials from Coast Guard headquarters and field units, including its Atlantic and Pacific Area commands, and two Coast Guard districts and two Coast Guard sectors collocated with them.<sup>3</sup> Headquarters and field officials we interviewed were responsible for the overall management of their organization, facilitating the implementation of organizational change efforts, and developing workforce assessments for staffing Coast Guard units.

To examine how the Coast Guard modernized its organization and the extent to which it has applied key reform practices to its organizational change efforts, we analyzed Coast Guard documents, including policies and guidance on how the Coast Guard implemented its modernization effort and descriptions of its status. In addition, we reviewed reports

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<sup>1</sup>See GAO, *Coast Guard: Observations on the Genesis and Progress of the Service's Modernization Program*, [GAO-09-530R](#). (Washington, D.C.: June 24, 2009) and *Coast Guard: Service Has Taken Steps to Address Historic Personnel Problems, but It Is too Soon to Assess the Impact of These Efforts*, [GAO-10-268R](#) (Washington, D.C.: Jan. 29 2010).

<sup>2</sup>GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019).

<sup>3</sup>The Coast Guard's 37 sectors report to nine districts, and each district reports to one of two area commands. We describe the Coast Guard's field structure later in the report.

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evaluating longstanding agency management challenges.<sup>4</sup> We assessed Coast Guard organizational changes that occurred as part of modernization against key practices we outlined in our June 2018 report on government reorganization.<sup>5</sup> Specifically, we collected and analyzed documentation related to the Coast Guard’s actions to implement organizational change efforts, such as the modernization effort and the integration of the Coast Guard’s reserve component into the headquarters governance structure. We assessed these reports, data, and other documents against selected criteria for key practices and considerations for agency reorganization identified in our June 2018 report on government reorganization.<sup>6</sup>

We evaluated the Coast Guard’s actions against key reform practices to determine if they were generally, partially, or not at all applied.

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<sup>4</sup>See Department of Homeland Security, *Integrated Strategy for High-Risk Management*, (Washington, D.C.: April 2019) and Department of Homeland Security, Office of Inspector General, *Major Management and Performance Challenges Facing the Department of Homeland Security*, OIG-18-11 (Washington, D.C.: Nov. 3, 2017).

<sup>5</sup>See GAO, *Government Reorganization: Key Questions To Assess Agency Reform Efforts*, [GAO-18-427](#) (Washington, D.C.: June 13, 2018). The four categories of key practices are “Goals and Outcomes,” “Process for Developing Reforms,” “Implementing the Reforms,” and “Strategically Managing the Federal Workforce.” We also reviewed related GAO work on reorganizations and transformation to help define the key practices and considerations identified in [GAO-18-427](#). See *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).

<sup>6</sup>In this report, we identified 58 key questions to consider for the development and implementation of agency reforms, based on our prior work. We used the term “reforms” to broadly include any organizational changes—such as major transformation, mergers, and other reorganizations—and efforts to streamline and improve the efficiency and effectiveness of government operations. We define “efficiency” as maintaining federal government services or outcomes using fewer resources (such as time and money) or improving or increasing the quality and quantity of services or outcomes while maintaining (or reducing) resources. We selected relevant key practices under these 58 key questions by examining each of the potential four categories and 12 subcategories identified in our June 2018 government reorganization report to determine the extent to which the practices under each applied to the Coast Guard’s reorganization efforts. Based on this determination, we assessed the Coast Guard’s implementation of its modernization against seven key practices under two categories and three subcategories we deemed relevant. Further, we assessed the Coast Guard’s reorganization of its reserve component against 19 selected key practices under four categories and seven subcategories we deemed relevant. Additional information regarding our selection criteria can be found in appendix I.



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- **Generally applied.** Agency documentation demonstrated that Coast Guard officials substantially applied applicable key practices.
  - **Partially applied.** Agency documentation demonstrated that Coast Guard officials applied some key practices but not to a significant degree.
  - **Not at all applied.** Agency documentation did not demonstrate that Coast Guard officials applied key practices.

To examine the extent to which the Coast Guard has assessed its workforce needs, we analyzed Coast Guard documentation, including guidance for assessing workforce needs and guidance that sets out the Coast Guard's 2016 Human Capital Strategy.<sup>7</sup> In particular, we analyzed documents on the Coast Guard's manpower requirements determination process, which is the process the Coast Guard is to use to determine the number of people and the mix of skills needed for each of its 158 unit types. To do this, we analyzed data from manpower requirements analyses and determinations that the Coast Guard prepared from calendar year 2003, when the service began implementing its manpower requirements determination process, through calendar year 2019, the last full year of data available at the time of our review. We assessed the reliability of these data, through electronic testing, reviewing documentation, and interviewing Coast Guard headquarters and field unit officials on how these data were collected and used. We determined that these data were sufficiently reliable for determining the number of positions within each type of Coast Guard unit. Finally, we evaluated the Coast Guard's workforce assessment efforts against Coast Guard guidance for conducting manpower requirements analyses, and best practices identified in our prior work related to strategic human capital management.<sup>8</sup>

Appendix I describes our objectives, scope, and methodology in more detail.

We conducted this performance audit from December 2018 to February 2020 in accordance with generally accepted government auditing

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<sup>7</sup>See *United States Coast Guard Human Capital Strategy*, (January 2016).

<sup>8</sup>See U.S. Coast Guard, *Coast Guard Organizational Manual*, COMDTINST M5400.7F (Jan 27, 2015), United States Coast Guard, *Manpower Requirements Plan*, U.S. Coast Guard (April 13, 2018), *Coast Guard Staffing Logic and Manpower Requirements Manual: Volume III, Analyst Process Guide*, (June 2015), and GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).

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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.

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## Background

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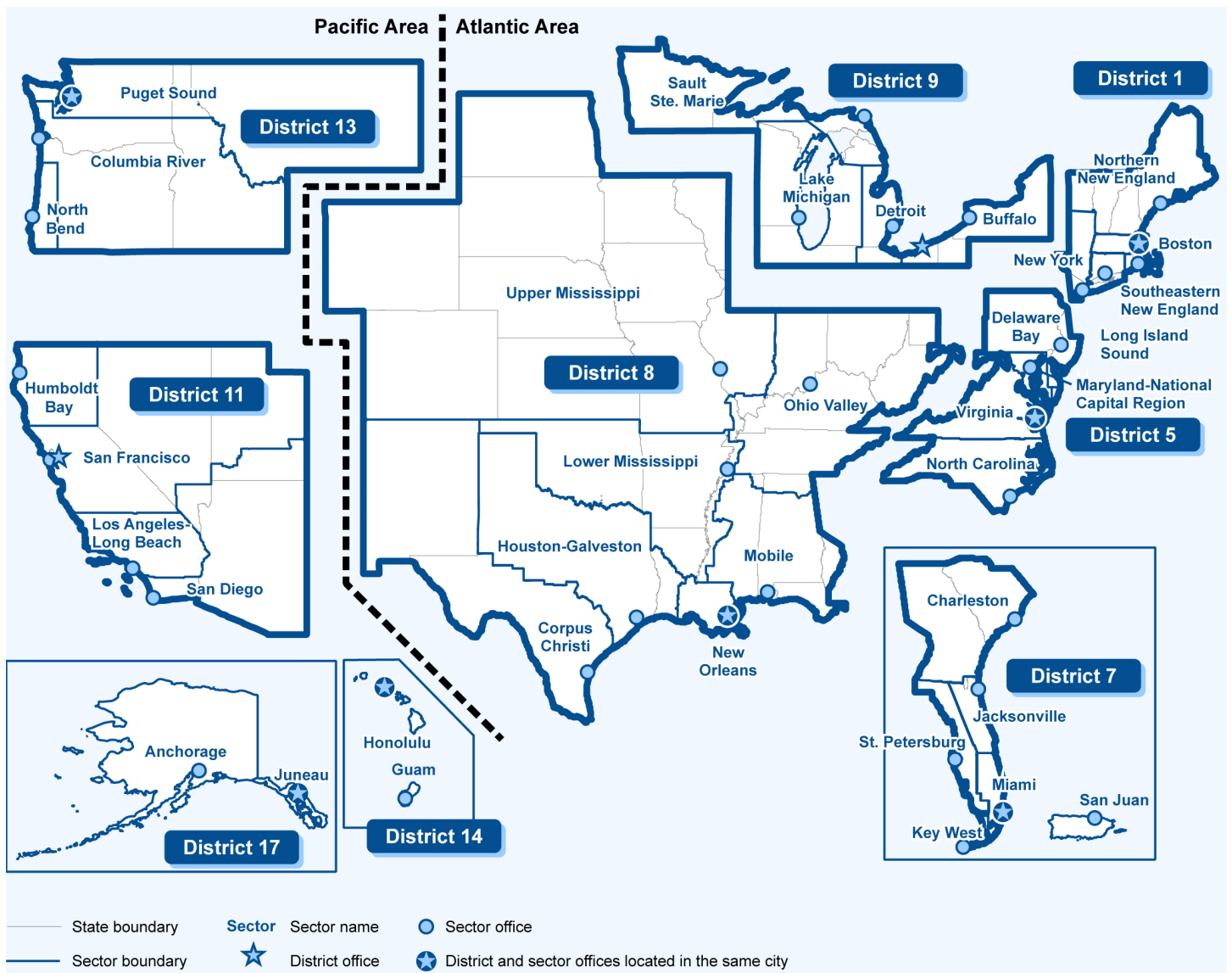
### Coast Guard Organizational Changes since 9/11

Since 9/11, the Coast Guard has made a series of organizational changes to realign its functions. First, from 2004 through 2006, under an effort known as "Sectorization," the Coast Guard revised its field structure by consolidating field activities under individual commands, known as sectors. The Coast Guard's 37 sectors report to nine districts, and each district reports to one of two area commands.<sup>9</sup> District commanders are responsible for regional operations and execute operations and missions within their area of responsibility. Sector commanders are responsible for local operations within each district. Each of the Coast Guard area commands, districts, and sectors is responsible for managing its assets and accomplishing missions within its geographic area of responsibility and, for the purposes of this report, are referred to as field units. Figure 1 shows the Coast Guard's field structure.

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<sup>9</sup>The Coast Guard's Atlantic Area command oversees all of Coast Guard's operations east of Colorado Rockies to the Arabian Gulf from Canada to the Caribbean. The Coast Guard's Pacific Area command oversees all of Coast Guard's operations from Montana to Madagascar and from the North to South Poles.

**Figure 1: Map Showing the U.S. Coast Guard's Two Area Commands, Nine Districts, and 37 Sectors**



Source: GAO analysis of U.S. Coast Guard data; MapInfo (map). | GAO-20-223

Note: This figure is not to scale and the nine Coast Guard districts are not numbered sequentially.

In June 2006, the Coast Guard implemented another organizational change effort known as modernization. The goal of modernization was to realign its mission planning and mission support functions, among other things. According to Coast Guard documents, the effort was intended to

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address challenges the Coast Guard faced in aligning its operations with Coast Guard-wide priorities, and delivering mission support in a more cost effective manner. It was also intended to realign the Coast Guard's operations and policies across multiple headquarters program offices. For example, the Coast Guard has six operational mission programs overseeing its statutory missions, and before modernization the leadership of each of them developed separate action plans and policies to execute their missions, while independently making resource decisions.<sup>10</sup> Through modernization, the Coast Guard also sought to improve delivery of mission support services throughout the field, particularly with respect to maintenance of the Coast Guard's assets, including its vessels, aircraft, and shore infrastructure.

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## Coast Guard Actions to Determine Workforce Requirements

The Coast Guard uses three analytical tools to determine its workforce requirements: manpower requirements determinations, the Sector Staffing Model, and the Activity-Based Staffing Model for boat stations. Manpower requirements determinations, which begin with a manpower requirements analysis (MRA), are the Coast Guard's preferred tool for determining the number of personnel and mix of skills its units require to meet mission needs, according to Coast Guard documents. The analysis identifies both the number of personnel required, and their necessary competencies, while also taking into account the effect of existing, new, or modified requirements on Coast Guard's workforce.<sup>11</sup> The Coast Guard considers the manpower requirements determination process to be its preferred method to determine workforce requirements for its assets and field units.

The Coast Guard's other two analytical tools—the Sector Staffing Model and Activity-Based Staffing Model—use historic levels of activity to determine workforce requirements. The Sector Staffing Model assesses workforce requirements for shore force units, while the Activity-Based Staffing Model assesses boat stations. For comparison, while activity

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<sup>10</sup>The Coast Guard's 11 statutory missions outlined in the Homeland Security Act of 2002 include: marine safety; search and rescue; marine environmental protection; ports, waterways, and coastal security; drug interdiction; migrant interdiction; living marine resources; other law enforcement; aids to navigation; ice operations; and defense readiness. 6 U.S.C. § 468(a).

<sup>11</sup>According to the Coast Guard's 2018 Manpower Requirements Manual, requirements are derived from law, policy, or regulations including United States Code and Code of Federal Regulations.

models may identify the workforce needed based on the activities previously conducted by a unit, determinations identify the workforce needed to conduct the activities required by a unit to accomplish its planned mission, based on documented requirements. For this reason, the Coast Guard considers activity models to be less reliable for determining workforce needs than manpower requirements. Table 1 summarizes these three Coast Guard analytical tools for determining workforce requirements.

**Table 1: U.S. Coast Guard Analytical Tools to Determine Workforce Requirements**

<b>Tool</b>	<b>Personnel included</b>	<b>Description</b>
Manpower requirements determinations	All Coast Guard units	Starts with a manpower requirements analysis, a structured analysis to determine the number and types of personnel needed to effectively perform each mission to a specified standard. Takes into account the effect of existing, new, or modified requirements on Coast Guard's workforce.
Sector Staffing Model	97 shore-based force units, including 37 sectors <sup>a</sup>	Staffing requirements decision-making tool to determine staffing needs at specific sectors, generally based on past levels of activities, and address the challenges of aligning sectors and subordinate units with mission activities.
Activity-Based Staffing Model for boat stations	192 boat stations	Calculates staffing standards based on readiness requirements, subordinate units supported, maritime security and response operation requirements, historic activity level, and unit resources, among others.

Source: GAO analysis of Coast Guard information. | GAO-20-223

Note: Activity models identify workforce needs based on the activities previously conducted by the unit. Requirements analysis identifies the workforce needed to accomplish the unit's mission, based on documented requirements. For this reason, the Coast Guard considers activity models to be less reliable for determining workforce needs than requirements analysis.

<sup>a</sup>Shore-based force units are a mix of operational and support personnel who conduct response and prevention missions. Sectors control most of these assets because their subordinate units are boat stations, aids to navigation teams, marine safety units, marine safety detachments, and vessel traffic services.

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## Coast Guard Realigned Operations and Mission Support Functions, but Did Not Consistently Apply Key Reform Practices to Modernization Effort

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### The Coast Guard Realigned Operations and Mission Support Functions

In a 2018 report to Congress, the Coast Guard stated that under the modernization effort, it realigned its operations and mission support functions to address deficiencies that affected its ability to fulfill missions.<sup>12</sup> Between 2009 and 2015, the effort focused on establishing headquarters organizations and business processes to manage operations and mission support. Central to the effort was the Coast Guard's establishment of three new headquarters organizations.

- **Deputy Commandant for Operations.** Created to manage operational strategy and policy. The Deputy Commandant for Operations is responsible for the strategic management of the Coast Guard's mission programs. This includes assessing and monitoring the performance of the Coast Guard's missions and developing Coast Guard-wide strategy and operational policy.<sup>13</sup> The Deputy Commandant for Operations also provides support for issues that affect multiple Coast Guard missions, such as managing intelligence activities, coordinating interaction with external stakeholders, and identifying new and emerging issues that threaten operations, such as cyberattacks. According to the Coast Guard's 2018 report to

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<sup>12</sup>According to the report, the effort was meant to address longstanding issues identified by internal studies and external studies by among others, GAO and the Congressional Research Service. These issues included deficiencies in the command and control structure, the acquisition and logistics systems, and other aspects of the Coast Guard's operations and capabilities such as its financial management systems. U.S. Coast Guard, *A Coast Guard for the Twenty-First Century: The Past, Present, and Future of Coast Guard Modernization*, (Washington, D.C.: Sept. 18, 2018).

<sup>13</sup>We previously reported on the Coast Guard's performance assessment process, see GAO, *Coast Guard: Actions Needed to Enhance Performance Information Transparency and Monitoring*, [GAO-18-13](#) (Washington, D.C.: Oct. 17, 2018).

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Congress, consolidating these functions under a single organization has enhanced operational effectiveness and efficiency and aligned national priorities with Coast Guard-wide planning efforts. In 2019, the Coast Guard placed its reserve component under the Deputy Commandant for Operations to better incorporate the Coast Guard's reserves into its plans for meeting mission needs.

- **Deputy Commandant for Mission Support.** Created to manage mission support delivery and business processes. The Deputy Commandant for Mission Support is responsible for managing mission support policy, strategy, planning, and resourcing to meet mission needs for human resources, engineering and logistics, information systems, and acquisitions. At the field level, through the Director of Operational Logistics, this organization assists with maintenance of assets and logistics planning through a network of bases.<sup>14</sup> The Director of Operational Logistics manages Coast Guard bases which deliver operations level support to specific assets and oversees the functions of each Coast Guard base.

In addition, the Deputy Commandant for Mission Support organization manages Coast Guard Logistic and Service Centers. Each logistic or service center exercises authority over its functions and the delivery of mission support to the Coast Guard's fleet of aircraft and vessels.<sup>15</sup> For example, the Aviation Logistics Center, located in Elizabeth City, North Carolina, is the lead entity for ensuring aviation asset services, such as maintenance and supply, for Coast Guard's aircraft, while the Surface Forces Logistics Center, in Baltimore, Maryland, is responsible for ensuring these services for its vessels. Coast Guard officials told us that the modernized mission support structure enabled the Coast Guard to standardize delivery of products and service. For example, they told us that this structure helped them ensure that the materials and parts provided remained consistent across the Coast Guard's field units.

- **Force Readiness Command (FORCECOM).** Created as an organization within the Deputy Commandant for Mission Support to

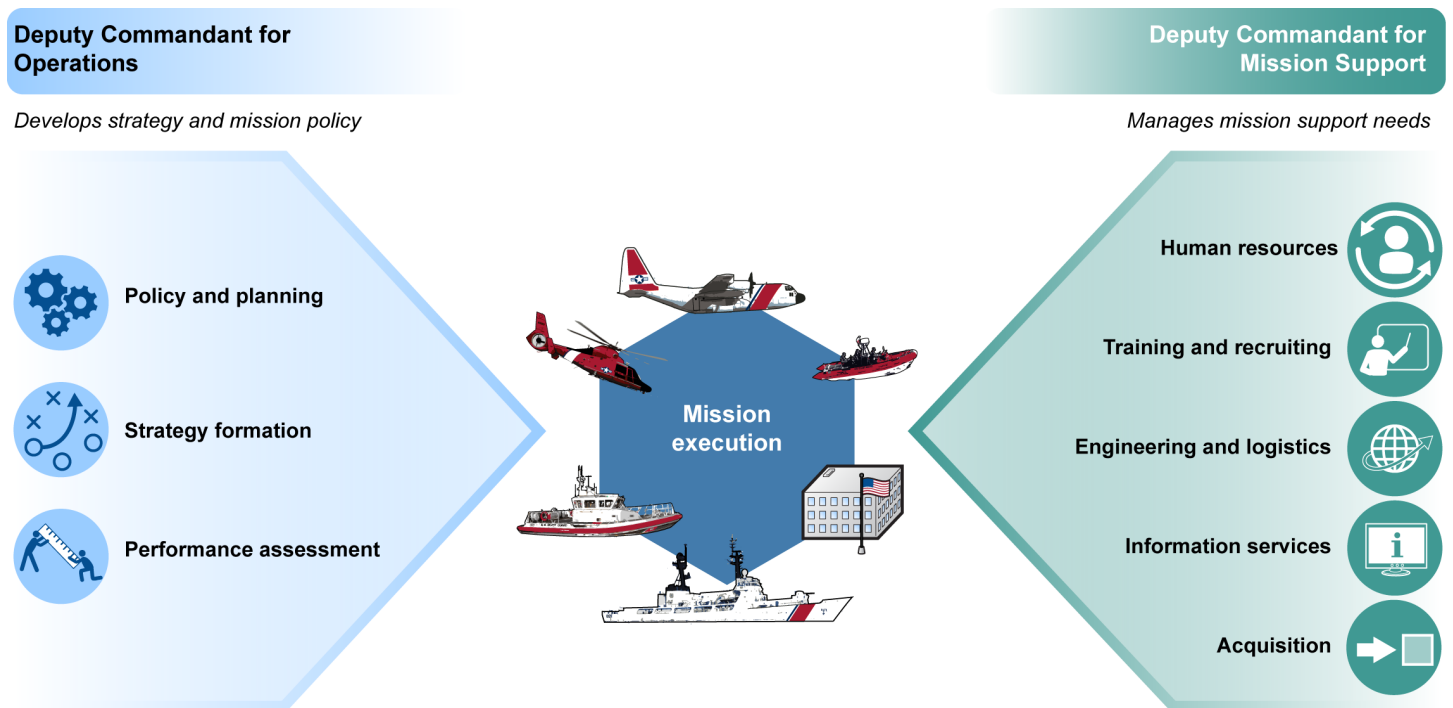
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<sup>14</sup>For example, Base Alameda, located in Alameda, California and Base Los Angeles Long Beach, in San Pedro, California are responsible for supporting personnel services and naval and facilities maintenance for the Coast Guard's 11<sup>th</sup> district.

<sup>15</sup>These centers include the Aviation Logistics Center; Command, Control, Communications, Computers, and Information Technology Service Center; Health, Safety and Work-Life Service Center; Personnel Service Center; Shore Infrastructure Logistics Center; and Surface Forces Logistics Center.

prepare the Coast Guard workforce to properly perform and execute missions. FORCECOM is responsible for overseeing Coast Guard’s training plans and policies. This includes developing and delivering training courses, and conducting performance and compliance assessments of units, to determine whether each mission has the necessary equipment and personnel skills to ensure operational readiness.<sup>16</sup> Figure 2 provides an overview of the Coast Guard’s modernized organizational structure and the responsibilities of the headquarters organizations known as the Deputy Commandant for Operations and Deputy Commandant for Mission Support.

**Figure 2: Overview of U.S. Coast Guard’s Modernized Organizational Structure and Responsibilities of the Deputy Commandant for Operations and Deputy Commandant for Mission Support**



Source: GAO analysis of U.S. Coast Guard information. | GAO-20-223

Note: FORCECOM is an organization within the Deputy Commandant for Mission Support, where it supports training plans and policies.

<sup>16</sup>FORCECOM conducts these functions through four divisions: Training, Exercise Support, Business Operations, and Assessments.



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## Coast Guard Continues to Make Organizational Changes

In 2018, the Coast Guard reported to Congress that while it completed its primary organizational changes, it continued to modernize its business processes. For example, it reported that it continued making improvements to its risk management process, organizational structure, and mission support functions, including human resources utilization and asset acquisition. In October 2019, Coast Guard officials told us that some of these adjustments continue in smaller, incremental efforts within the Deputy Commandant offices and individual Coast Guard programs. For example, Coast Guard officials from the Office of Mission Support Integration within the Deputy Commandant for Mission Support told us that efforts to modernize its mission support functions were ongoing. Officials told us that they were centralizing management of certain support delivery functions. Officials told us that centralization would help to ensure consistency in how functions are performed across the organization, as well as provide access to timely and complete information about the status of assets, personnel, and equipment. They told us that the Deputy Commandant for Mission Support had largely centralized such functions for one directorate—engineering and logistics—and expected to apply them for another directorate responsible for information systems in fiscal year 2020.<sup>17</sup>

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<sup>17</sup>Deputy Commandant for Mission Support organization includes four headquarters directorates: Human Resources; Engineering and Logistics; Command, Control, Communications, Computers and Information Technology; and Acquisition.

### The Coast Guard's Reserve Component

Coast Guard's reserve component is its only workforce dedicated to respond to contingency operations such as natural disasters.

**Mission Demand:** The Coast Guard found that demand for reserve forces to augment its active duty workforce has grown as the Coast Guard is called to respond to more contingencies. The reserve component roughly represents 12 percent of the Coast Guard's total workforce.

#### Organizational Changes:

- In 1995, the Coast Guard integrated the reserve and active duty workforce at the field level; however, the component did not have headquarters representation.
- In 2006, the Coast Guard issued a modernization goal to optimize the use of the reserve component by ensuring the workforce had the necessary training and support.
- In 2018, the Coast Guard chartered a project team to evaluate the state of the reserve component's governance. The team found that the structure under the Deputy Commandant for Mission Support did not take into account the difference between the reserves workforce and Coast Guard programs.
- In 2019, the Coast Guard established a new reserve component organization under the Deputy Commandant for Operations.



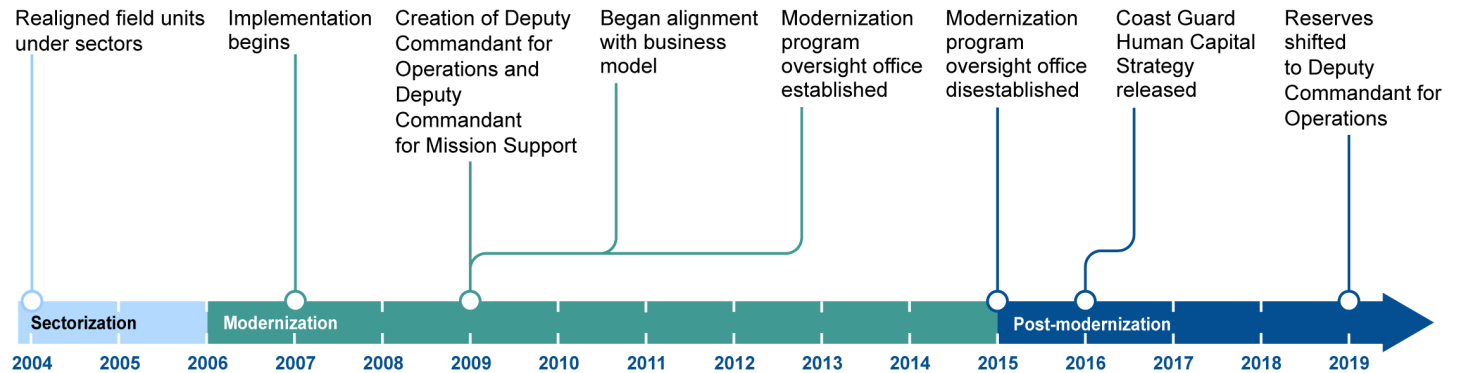
U.S. Coast Guard Reserve Mobile Support Unit Baltimore maintaining response equipment

Source: GAO analysis of Coast Guard | GAO-20-223

According to officials, the Coast Guard has faced difficulty applying these same mission business practices to human resources since these practices focus on a specific capability and are geared more towards assets, such as vessels and aircraft, rather than personnel. Specifically, while information about the status of asset availability is generally static, there are more variables to determining the Coast Guard's human resources needs. For example, in addition to identifying the size of the workforce necessary to perform missions, the Coast Guard must also consider how to retain personnel and develop a workforce that can adapt to changes such as addressing emerging threats like cyber-attacks.

Changes stemming from modernization continued with the Coast Guard's reorganization of its reserve component (see sidebar). In June 2019, the Coast Guard moved its reserve component from the Deputy Commandant for Mission Support to the Deputy Commandant for Operations. Coast Guard officials stated that the change was meant to address longstanding issues, such as not incorporating the reserve component into Coast Guard-wide policymaking. Coast Guard officials stated that when the reserve component was under the mission support organization, it was not strategically managed to align with Coast Guard-wide mission needs. For example, when reserve components were dispatched, there was no plan to support all of the operational needs of the mission, such as by providing additional equipment needed by the reserve workforce. Figure 3 provides a timeline of key actions the Coast Guard took from 2004 through 2019 to modernize its organizational structure.

**Figure 3: Timeline of Key U.S. Coast Guard Actions to Modernize its Organizational Structure, Calendar Years 2004 through 2019**



Source: GAO analysis of U.S. Coast Guard information. | GAO-20-223

### Coast Guard Has Not Consistently Applied Selected Key Reform Practices to Modernization Effort








The Coast Guard has not consistently applied selected key reform practices to its modernization effort. Specifically, the Coast Guard did not apply or partially applied 5 of 7 selected key practices. We have previously reported that an agency must closely and carefully manage organizational reforms, since fully implementing major transformations can span several years.<sup>18</sup> This is particularly important when the transformations include several major changes to the organization.

The Coast Guard’s 2018 report to Congress on its modernization effort acknowledged that the risk of complications increases significantly with large-scale reorganization efforts, such as modernization, and noted that such changes require formal processes to look for complications as they arise and to fully assess their impact on the organization, including its workforce. To this end, we assessed the Coast Guard’s implementation of its modernization effort against selected key reform practices in three subcategories—Leadership focus and attention; Managing and monitoring; and Strategic workforce planning—and found the Coast




<sup>18</sup>GAO, *Government Reorganization: Key Questions to Assess Agency Reform Efforts*, GAO-18-427 (Washington D.C.: June 13, 2018). See also GAO, *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, GAO-03-669 (Washington, D.C.: July 2, 2003).

Guard did not consistently apply these practices.<sup>19</sup> Additionally, we assessed the extent to which the Coast Guard’s reorganization of its reserve component applied key reform practices under the Leadership focus and attention, Managing and monitoring and Strategic workforce planning subcategories.<sup>20</sup> Figure 4 shows our assessment of the extent to which the Coast Guard’s actions to implement the modernization effort applied selected key reform practices.

**Figure 4: Extent to Which the Implementation of the U.S. Coast Guard’s Modernization Effort Applied Selected Key Reform Practices**

Category	Subcategory	Key practices	Assessment
Implementing the reforms	Leadership focus and attention	Identify case for change	
		Dedicated implementation team	
		Holding leaders accountable	
	Managing and monitoring	Track implementation progress	
		Process to collect data to measure progress	
		Measure employee satisfaction	
Strategically managing the federal workforce	Strategic workforce planning	Assess effects on workforce	

**Legend**

-  **Generally applied:** the agency documents demonstrated that Coast Guard officials substantially applied applicable key practices
-  **Partially applied:** the agency documents demonstrated that Coast Guard officials applied some applicable key practices, but not to a substantial degree
-  **Not at all applied:** the agency documents did not demonstrate that Coast Guard officials applied applicable key practices

Source: GAO analysis of U.S. Coast Guard information. | GAO-20-223

<sup>19</sup>We assessed the implementation of the Coast Guard’s modernization effort against selected key reform practices outlined in [GAO-18-427](#) and [GAO-03-669](#). We did not include key practices we determined were primarily relevant to the early planning phase of the modernization effort since the Coast Guard began implementing modernization in 2006 and retrospective analysis of these criteria would not result in the agency being able to make changes. See appendix I for additional information about how we selected the key reform practices we used in our analysis.

<sup>20</sup>See appendix III for a detailed assessment the extent to which the Coast Guard has applied key reform practices to the reorganization of its reserve component.

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## Leadership Focus and Attention

We found that the Coast Guard generally applied two key practices under this subcategory, including identifying a case for change and dedicating a team to lead the initial implementation effort, and it partially applied the key practice of holding leadership accountable for its success.<sup>21</sup>

**Identify case for change.** The Coast Guard generally applied this key practice because it identified a case for change to continue to drive the need for the modernization effort. Our prior work shows that key elements of successful initiatives are the demonstrated commitment of top leaders and accountability for change.<sup>22</sup> Further, top leadership involvement and clear lines of accountability for making improvements are critical to overcoming organizations' natural resistance to change. According to Coast Guard documents, in 2006, when the modernization effort started, Coast Guard leadership promoted the changes outlined in the Coast Guard's 10 modernization initiatives through internal memos and action plans.<sup>23</sup> Coast Guard documentation highlighted the benefits of the change and identified the next steps to be taken in order to complete the change. Additionally, commandants issued their strategic priorities highlighting plans for the modernization effort. More recently, the Coast Guard's 2018 report to Congress reiterated the importance of the modernization effort, noting that the challenges that initially drove the need for organizational changes continue to challenge the Coast Guard.

**Dedicated implementation team.** The Coast Guard generally applied this key practice because it established a team to implement its modernization changes. In 2007, Coast Guard created the Strategic Transformation Team to coordinate the early implementation of the modernization effort. According to Coast Guard officials from the Office of Resource, Organizational Analysis, and Workforce Management, as the effort moved from the planning stages to implementation, the team consolidated the goals in the Coast Guard's 10 modernization initiatives into five main reorganization efforts. The team was responsible for ensuring that the implementation of these five efforts was consistent with

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<sup>21</sup>[GAO-18-427](#) and [GAO-03-669](#).

<sup>22</sup>GAO, *Management Reform: Elements of Successful Improvement Initiatives*, [GAO/T-GGD-00-26](#) (Washington D.C.: Oct. 15, 1999). See also [GAO-10-268R](#) and GAO, *State Department: Leadership Focus Needed to Guide Agency Reform Efforts*, [GAO-19-450](#) (Washington, D.C.: Aug. 1, 2019).

<sup>23</sup>See appendix II for an overview of the Coast Guard's modernization goals outlined in Commandant intent action orders issued in 2006.

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the initial goals of modernization. This included facilitating the use of the Coast Guard's existing organizational review and approval processes for organizational changes and leading the measurement processes for ensuring that the goals of modernization were met.

**Hold leaders accountable.** The Coast Guard partially applied this key practice because it initially established an office to oversee its modernization but did not continue these efforts to ensure leadership accountability for modernization implementation. In 2009, the Coast Guard created a permanent oversight office under the Office of the Vice Commandant to transition the coordination responsibilities of the Strategic Transformation Team to monitor implementation of the modernization effort.<sup>24</sup> The office was given an expanded role of managing change efforts across the Coast Guard, including overseeing the development of metrics related to organizational change efforts to ensure that these changes achieved goals.<sup>25</sup>

However, in 2015 the Coast Guard disestablished this oversight office and did not specify any office responsible for ensuring organizational change efforts met intended goals. According to Coast Guard officials from the Office of Resource, Organizational Analysis, and Workforce Management, the Coast Guard redistributed some of the oversight office's responsibilities among other offices within the established headquarters organizations. The officials told us they did so since they determined the initial goals of modernization—to create the new headquarters organizations—had been met and oversight was no longer needed. These officials stated that the individual headquarters organizations could manage any necessary planning moving forward for their specific organization.

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<sup>24</sup>This office was the Enterprise Strategy, Management and Doctrine Oversight Directorate. According to Coast Guard officials from the Office of Resource, Organizational Analysis, and Workforce Management, the oversight office was established on the recommendation of a 2009 report by the National Academy of Public Administration. See the National Academy of Public Administration, *U.S. Coast Guard Modernization Study* (April 2009). We did not review the extent to which the functions of the oversight office met the recommendation.

<sup>25</sup>The office functions were conducted through four components, including Doctrine Oversight, Strategic Analysis, Strategic Change Management, and Performance Management. According to the Coast Guard's description of the office's responsibilities, change management and performance management was meant to be a focus of the office to enhance the Coast Guard's ability to monitor organizational changes.

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As such, the Coast Guard's shifting leadership priorities affected what parts of the modernization effort were implemented and, in some cases, resulted in years spent working towards a change that was later terminated. For example, in 2012, the Commandant stated that the original modernization initiative to establish a single operations command to manage field operations was not near completion, taking up institutional energy, and impacting operations. As a result, he decided to discontinue the effort and retain the two area field command structure. However, according to Coast Guard officials from the Office of Resource, Organizational Analysis, and Workforce Management, planning for the effort was close to completion, and ending it led to the reassignment of staff. During this time, the Coast Guard also reduced FORCECOM's role from managing and measuring the overall readiness capabilities of the service to focusing on workforce training, and moved the organization under the Deputy Commandant for Mission Support. At that point, the Coast Guard had already prepared and issued a business plan for FORCECOM outlining the initial primary mission, goals and metrics for evaluating effectiveness.<sup>26</sup>

We also assessed the Coast Guard's application of key reform practices against its reorganization of the reserve component and found, similar to our determinations of the modernization effort, it partially applied key practices under Leadership focus and attention.<sup>27</sup> For example, while the Coast Guard identified key leadership and stakeholders currently responsible for implementing the effort, it could not demonstrate that there is a process to ensure leaders are held accountable for this implementation.

## Managing and Monitoring

The Coast Guard did not apply the two key practices of tracking implementation progress or collecting data to measure progress of the effort, and partially applied the other key practice of measuring employee satisfaction with the modernization effort. We have previously found that organizational transformations must be carefully and closely managed in order to monitor progress towards achieving intended goals, since fully implementing major transformations can span several years. This is particularly important for the modernization effort which the Coast Guard

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<sup>26</sup>U.S. Coast Guard, *FORCECOM Fiscal Year 2009-2010 Business Plan*, First Edition (Version 1.0) (October 2008).

<sup>27</sup>See appendix III for a detailed assessment the extent to which the Coast Guard has applied key reform practices in its reserve component integration effort.

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reported in 2018 had fundamentally altered how it conducts business across the organization, for every mission and at every level. Managing and monitoring organizational reforms includes applying key practices such as tracking and measuring progress and developing mechanisms to seek and monitor employee satisfaction with changes resulting from reforms.

**Track implementation progress.** The Coast Guard did not apply this key practice because it did not track its progress in implementing the modernization effort on an ongoing basis. Officials told us that during the early stages of modernization, the Coast Guard developed implementation plans and engaged in a significant planning effort to finalize the organizational realignment. These plans provided a method to track the Coast Guard's progress as they implemented each phase of modernization; however, as the effort matured, the Coast Guard determined that the effort did not require the same amount of planning as initial implementation. In 2009, during the early stages of modernization, the Coast Guard reported that it had efforts planned or underway to monitor the implementation progress of the modernization effort, including developing implementation plans, goals, and performance metrics.<sup>28</sup> As the modernization effort matured and the Deputy Commandant for Mission Support and Deputy Commandant for Operations were created, Coast Guard officials determined that they did not need the same amount of planning, and the Coast Guard stopped updating its implementation plans.

Additionally, for the reorganization of the reserve component, the Coast Guard has minimally applied practices under the Managing and monitoring category. In particular, the Coast Guard did not track implementation progress of the reorganization.<sup>29</sup> For example, the Coast Guard established the new reserve component without finalized plans or milestones and metrics against which it could track implementation progress.

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<sup>28</sup>[GAO-09-530R](#). See also, National Academy of Public Administration, *U.S. Coast Guard Modernization Study* (April 2009).

<sup>29</sup>We used an additional determination, minimally applied, to assess the Coast Guard's recent reserve component Integration since this effort is currently in its initial implementation stage. We determined that a subcategory was minimally applied where Coast Guard documentation demonstrated that officials applied a limited number of key reform practices, with significant gaps in actions associated with each practice.



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**Collect data to measure progress.** The Coast Guard did not apply this key practice because it did not collect data to measure the extent to which the modernization effort achieved its goals. In 2009, the Coast Guard reported that it had plans underway to identify existing metrics and gather data that would enable evaluation of the performance and effectiveness of its modernized processes and facilitate continued improvements. This was to include indicators that could be applied across the modernization efforts' multiple goals and priorities such as quality, timeliness, cost, and outcomes. At the time, the Coast Guard reported that this would take approximately 6 months to 1 year to complete. However, according to officials from the Office of Resource, Organizational Analysis, and Workforce Management, its plans were discontinued due to the disestablishment of the oversight office and changing leadership priorities. Further, they stated that the Coast Guard no longer felt the need to monitor the effort since it determined the initial goals had been achieved with the establishment of the new headquarters organizations.

In 2018, the Coast Guard reported to Congress that changes to mission support systems and business processes were significant changes and demonstrated the success of the modernization effort by developing a more effective and efficient organization. However, while officials from multiple offices told us that these changes resulted in better data and greater efficiency, the Coast Guard could not identify metrics or a data collection system that could demonstrate that the Coast Guard's implementation of the modernization effort had improved effectiveness or efficiency. Moreover, in our review of the Coast Guard's organizational change process, we found no metrics, time frames, or milestones to track whether, and to what extent, its organizational changes were achieving the goals of the effort. Similarly, for the reorganization of the reserve component, the Coast Guard did not collect data to measure progress. For example, the Coast Guard established no milestones or metrics against which to measure the reserve components' progress in achieving its intended goal of improved mission performance.

**Measure employee satisfaction.** The Coast Guard partially applied this key practice because it sought employee feedback during the early stages of the modernization effort, but did not continue to measure employee satisfaction with the effort. During the initial implementation of modernization, the Coast Guard used a combination of informal and formal mechanisms to seek employee satisfaction. For example, according to a 2009 National Academy of Public Administration report, the Commandant reached out to personnel through informal means, such as social media, to communicate and obtain real time feedback from staff

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affected by the organizational changes.<sup>30</sup> Formally, the Coast Guard obtained anecdotal information through surveys of staff through the Organizational Assessment Survey and the Office of Personnel Management's Federal Employee Viewpoint Survey; however, these methods do not include specific questions related to the impact of organizational change efforts. Specifically for modernization, beyond efforts during the early stages of modernization, there has been no sustained Coast Guard-wide effort to monitor the impact of the change on employees.

According to a senior Coast Guard official from the Office of Resource, Organizational Analysis, and Workforce Management, the Coast Guard is not required to conduct such assessments as changes are implemented. Specifically, the document governing the Coast Guard's organizational change process does not specify measuring employee satisfaction as part of the organizational change request process.<sup>31</sup> Additionally, though the Coast Guard currently has formal mechanisms in place that would enable it to seek employee satisfaction, our review of recent surveys found that these instruments do not include questions specific to the impact of organizational change efforts; nor do they capture employee perspective in a timely manner.<sup>32</sup>

## Strategic Workforce Planning

We found that the Coast Guard partially applied the key practice of assessing effects of modernization on its workforce by engaging in some activities that assess its impact on its current and future workforce and planning to determine whether needed resources and capacity were in place. We have previously reported that people are at the heart of any serious reform effort because people define the organization's culture, drive its performance, and embody its knowledge base. This is echoed in the Coast Guard's large-scale enterprise-wide change management

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<sup>30</sup>National Academy of Public Administration *U.S. Coast Guard Modernization Study* (April 2009).

<sup>31</sup>U.S. Coast Guard. *Coast Guard Organizational Manual*, COMDTINST M5400.7F (Jan 27, 2015).

<sup>32</sup>In 2009, the National Academy of Public Administration reported that these mechanisms were meant to be conducted biennially so they would not provide the Coast Guard with periodic evaluation necessary to track issues as they arise or allow for timely course corrections. See National Academy of Public Administration, *U.S. Coast Guard Modernization Study* (April 2009). According to Coast Guard officials the results from the 2019 Organizational Assessment Survey are not scheduled to be distributed until spring 2020.

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guidance, which stresses the need for a formal, structured approach to manage the people side of change to increase likelihood of success.

One of the goals of the modernization effort was to create a Coast Guard-wide human resources strategy to better support mission execution. The Commandant reiterated this commitment in September 2018 testimony to Congress by stating that the Coast Guard's strategic plan would incorporate its 2016 Human Capital Strategy, a 10-year plan to ensure that the Coast Guard develops the workforce necessary to meet mission demands.<sup>33</sup> In addition, the Coast Guard has taken steps to build a Force Planning Construct model to inform leadership on the forces and capabilities needed to execute its steady state and contingency operations.<sup>34</sup> In its April 2018 Manpower Requirements Plan to Congress, the Coast Guard stated that it envisioned using the model to assess future workforce needs. According to developers of the model, the foundation of the tool was the completion of manpower requirements determinations for all 158 Coast Guard unit types.<sup>35</sup> However, the Coast Guard has completed such determinations for a small fraction of its workforce, as we discuss later in this report.

Finally, for the reorganization of the reserve component, we found that the Coast Guard had minimally applied the key practice under Strategic workforce planning. In particular, officials from the new reserve component told us that even though the reserve force is not covered by

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<sup>33</sup>U.S. Coast Guard, *Coast Guard Strategic Plan 2018-2022*, (November 2018). U.S. Coast Guard, *Human Capital Strategy*, (January 2016).

<sup>34</sup>The Force Planning Construct is a model used to determine the size and shape of the workforce needed to fulfill current and future mission demands.

<sup>35</sup>Unit types are assets, such the National Security Cutter, or offices, such as the Office of Civilian Human Resources, that perform the same mission function. For the purposes of this report, a unit type is defined as a group of units with a similar function, or groups of personnel requiring a manpower requirements determination, as determined by the Coast Guard. A position or unit type is supported by a manpower analysis if the Coast Guard has determined the optimal number and types of staff required to accomplish its assigned mission.

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existing workforce planning tools, the Coast Guard continued to proceed with reorganizing the reserve force structure.<sup>36</sup>

For each of the key reform practices that were not fully implemented, we found that the Coast Guard's organizational change request process and associated guidance documents did not require such practices to be followed, nor did they require tracking implementation of changes, collecting data to measure progress, or assessing employee satisfaction. By not fully implementing each of these key practices, the Coast Guard may miss opportunities to demonstrate that its investment in the modernization effort meets its ultimate goals to enhance efficiency and effectiveness and to improve the overall performance of the Coast Guard. Systematically tracking progress of organizational change efforts and measuring their effects, including employee satisfaction, would better position the Coast Guard to identify challenges, if any, to meeting the goals of the organizational change in a timely manner.<sup>37</sup> Further, the Coast Guard noted that metrics used to show the effect on its efficiency, mission effectiveness, and operations may be used to measure and influence future modernization efforts.

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<sup>36</sup>Officials stated that since manpower requirements analyses are geared towards the workforce in steady state, completing an analysis would be complex. Further, officials told us that developing the model needed to calculate the needed reserve workforce would be a major effort due to its complexity and there are currently no time frames in place to complete this effort.

<sup>37</sup>We define systematic here as an evaluative process conducted continuously and regularly throughout the implementation of the organizational change effort. As such, examples of individual efforts that have applied key reform practices would not demonstrate that the Coast Guard has a systematic process in place to determine if organizational changes are achieving goals.

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## Coast Guard Has Assessed a Small Portion of its Workforce Needs and Does Not Have the Information Needed to Achieve its Manpower Assessment Goal

The Coast Guard's manpower requirements determination process is its preferred method for determining workforce needs because it identifies the workforce needed to conduct required mission activities; however, since it began implementing the process in 2003, the Coast Guard has completed it for only 6 percent of its workforce. Further, for those positions with which the Coast Guard has used the manpower requirements determination process, it has not consistently done so in accordance with Coast Guard guidance. For example, while required by Coast Guard guidance, the Coast Guard has not tracked the number of MRAs and manpower requirements determinations completed. In its April 2018 Manpower Requirements Plan to Congress, the Coast Guard set a goal for using the manpower requirements determination process to identify staffing needs for all positions in all units, but does not have information on the resources it would need to do so.

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## Coast Guard Has Assessed Workforce Requirements for a Small Portion of its Workforce

The Coast Guard has completed workforce assessments for a small portion of its 58,000 personnel across its 158 unit types. From calendar years 2014 through 2019, the Coast Guard used its three analytical tools—manpower requirements determinations, the Sector Staffing Model, and the Activity-Based Staffing Model—to complete workforce assessments for approximately 21 percent of its 58,000 position workforce. According to Coast Guard guidance, manpower requirements determinations are to be updated every 5 years.<sup>38</sup> However, the Coast Guard completed the manpower requirements determination process, its primary workforce analysis tool, for only about 2 percent of positions during this 5-year span. In 2019, the Coast Guard used the Sector Staffing Model to assess workforce requirements for about 9 percent of positions. Finally, in 2019 the Coast Guard used the Activity-Based Staffing Model for boat stations to assess workforce requirements for about 9 percent of positions, according to officials.

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<sup>38</sup>Workforce assessment information for the manpower requirements determination process is provided for fiscal years 2014 through 2019 because the process consists of studies intended to be completed cyclically every 5 years. Coast Guard guidance denotes a goal of completing the manpower requirements determination process every 5 years. On the other hand, the Sector Staffing Model and Activity-Based Staffing Model are updated each year. The three workforce assessment tools, that together support about 21 percent of the Coast Guard's workforce, individually appear to add up to only 20 percent due to rounding.

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Coast Guard Has Generally Not Implemented the Manpower Requirements Determination Process

According to its 2016 Human Capital Strategy, the manpower requirements determination process is the Coast Guard's primary tool for defining the human capital its units require to meet mission needs. To this end, the Coast Guard's goal is to use this process to establish manpower requirements for all positions in all units. Coast Guard guidance for implementing the manpower requirements determination process includes three key steps as noted in the service's 2015 Staffing Logic and Manpower Requirements Manual.

- **MRA.** The manpower requirements determination process begins with programs or Coast Guard leadership, such as the Commandant or Vice Commandant, requesting an MRA, which is a comprehensive review of workforce needs as determined from a wide range of factors. These factors include regulations, training, and competencies needed to effectively perform each mission. The MRA assesses the information necessary to adjust personnel, resources, mission, or risk, depending on availability of resources.<sup>39</sup> Officials from the manpower requirements determination program, contractors, or in some cases, other Coast Guard programs, may conduct MRAs.
- **After Action Report.** MRA requesters are to submit an after action report within 6 months after the MRA is completed. The after action report is to outline actions to be taken based on an MRA. These actions could include adding resources, adjusting requirements, or assuming additional risk.<sup>40</sup>
- **Manpower Requirements Determination.** The process is to conclude with a manpower requirements determination. The determination identifies the number and type of positions a unit type requires to meet mission-based capability requirements. In developing the determination, stakeholders are to review MRA results and

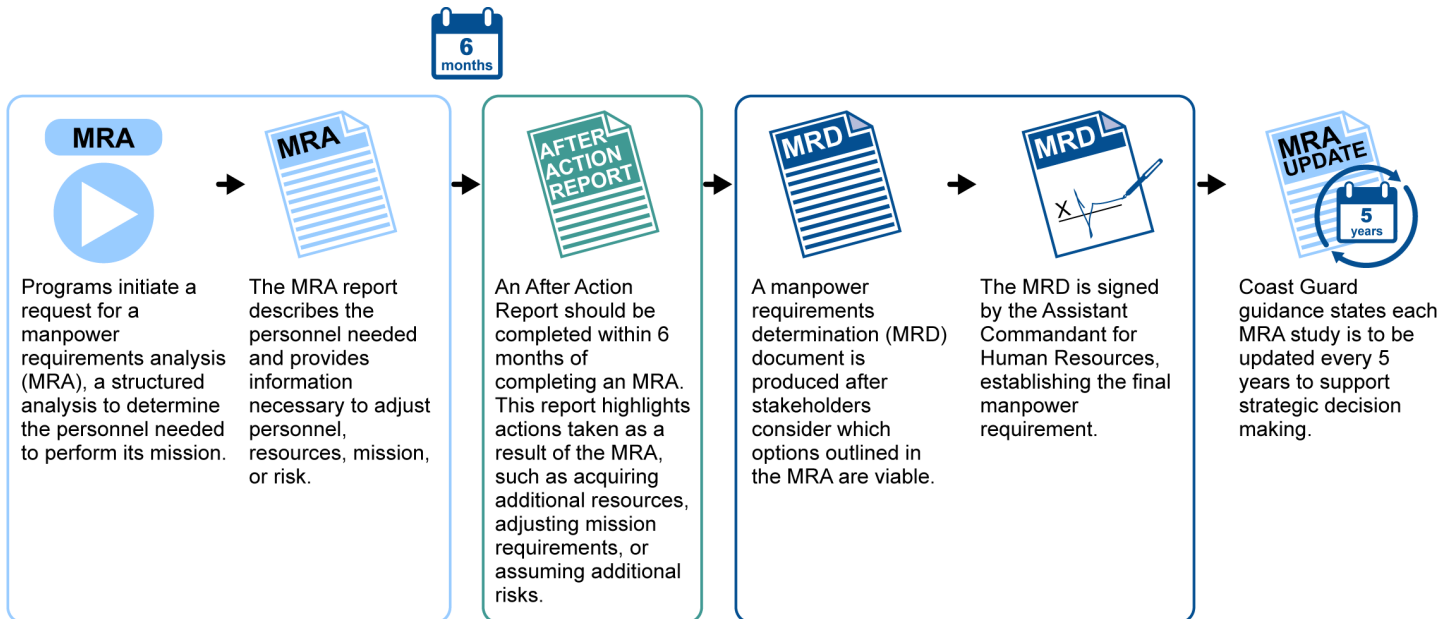
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<sup>39</sup>According to the Coast Guard's 2018 Manpower Requirements Manual, outside of the manpower requirements determination process, the Coast Guard may conduct other less rigorous types of manpower studies depending on the needs of the requester and data available. A Manpower Assessment, the least rigorous manpower study, can determine man-hours, help identify gaps in requirements, and support early resourcing decisions. A Manpower Estimate Report is applied to a previously undefined mission requirement, and serves as foundational data for a future MRA.

<sup>40</sup>Risk is the product of the consequences of an unwanted outcome, such as dangerous conditions, and its probability of occurring. According to Coast Guard guidance, taking calculated risks is essential for an organization to grow and capitalize on its capabilities. Assuming additional risk involves assessing the risks associated with allowing continued gaps between the number of personnel recommended and the personnel that are available.

develop the determination, while documenting any changes from the initial MRA. These stakeholders typically include representatives from the program assessed in the MRA and experts from around the Coast Guard in areas such as personnel assignments, workforce forecasting, training availability and capacity, and resource oversight, among others. The manpower requirements determination program then submits the determination to be signed by the Assistant Commandant for Human Resources. This signed memorandum, known as the determination, formalizes the final manpower requirement. Figure 5 summarizes the Coast Guard’s manpower requirements determination process, according to Coast Guard guidance.

**Figure 5: The U.S. Coast Guard’s Manpower Requirements Determination Process, According to U.S. Coast Guard Guidance**



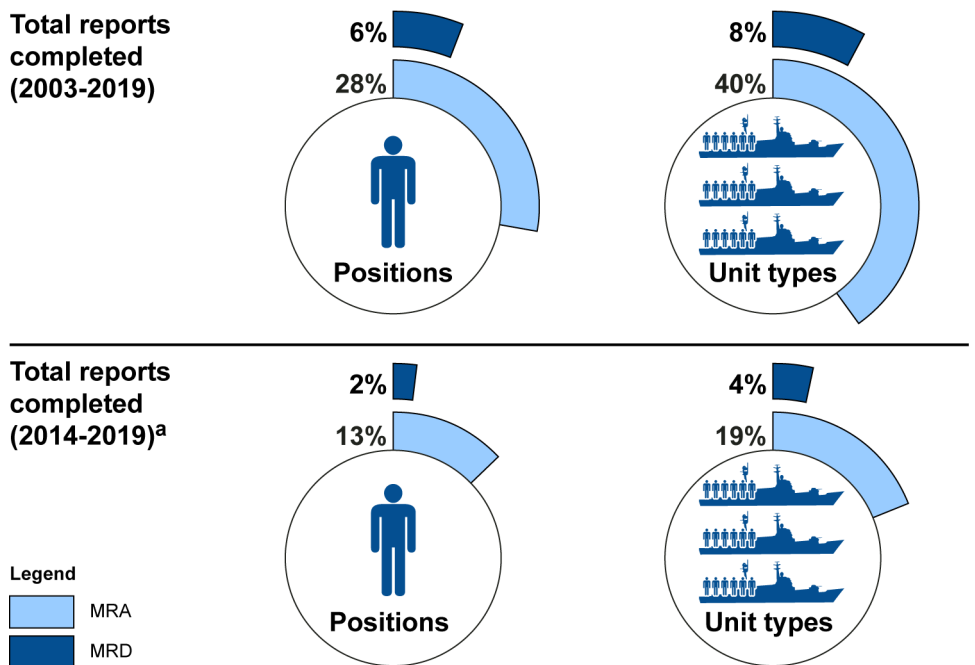
Source: GAO analysis of U.S. Coast Guard guidance. | GAO-20-223

We found that the Coast Guard has not ensured that all three key steps of the manpower requirements determination process are completed since it began implementing it in 2003. Since 2003, the Coast Guard conducted MRAs for 28 percent of its workforce. However, the Coast Guard completed manpower requirements determinations for only 6 percent of its workforce. Moreover, we found that this trend continued with MRAs that the Coast Guard completed within the past 5 years. For example, according to our analysis of Coast Guard documentation, from calendar

years 2014 through 2019, the Coast Guard conducted MRAs for 13 percent of its workforce, but completed determinations for 2 percent. Further, Coast Guard officials reported they did not have documentation of having conducted after action reports for any MRAs.

Figure 6 shows the share of the Coast Guard’s workforce that is supported by the manpower requirements determination process. The top row shows the share of workforce supported by this process since its inception in 2003. The bottom row shows the workforce supported by up to date MRAs and determinations—completed between 2014 and 2019—according to guidance.

**Figure 6: Share of U.S. Coast Guard Workforce Supported by Manpower Requirements Analyses (MRA) and Manpower Requirements Determinations (MRD), Calendar Years 2003 through 2019**



Source: GAO analysis of U.S. Coast Guard reports. | GAO-20-223

Note: The Coast Guard began implementing the manpower requirements determination process in 2003. The first column identifies the percentage of staff positions in its workforce that the Coast Guard has supported with manpower analysis. The second column identifies the percentage of unit types assessed, with one MRD typically identifying staffing needs for one unit type.

<sup>a</sup>Coast Guard guidance states that MRAs should be updated every 5 years. This row shows the share of MRAs and MRDs the Coast Guard has completed within the past 5 years, in accordance with its guidance and goal of conducting assessments and determinations every 5 years.



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The Coast Guard's 2018 Manpower Requirements Plan to Congress states that the Coast Guard's goal is to have updated manpower requirements determinations for all authorized positions in all units.<sup>41</sup> When it reaches that goal, the manpower requirements determination process will allow the Coast Guard to know which units are the most understaffed, and to make service-wide decisions based on where the most urgent needs are. Only when determinations have been completed for its entire workforce can Coast Guard leadership allocate personnel in the most effective and efficient manner. Notably, Coast Guard documents emphasize the importance of an enterprise-wide approach to track and manage resources because it enables leadership to compare needs and make informed trade-offs across programs.<sup>42</sup>

In 2019, officials in the manpower requirements determination program told us that MRAs were to be updated every 5 years. Officials stated that this is a best practice that aligns with the Department of Homeland Security's workforce strategy. Pacific Area Command officials we spoke with also told us that they view the guidance as requiring that MRAs should not be older than 5 years. Additionally, the Coast Guard's 2015 Staffing Logic and Manpower Requirements Manual states that the Manpower Requirements Determination Program Division Chief is responsible for ensuring that each unit type has undergone an MRA within the past 5 years. Nevertheless, in November 2019, Coast Guard officials in the manpower requirements determination program told us that they view it as a goal to update MRAs every 5 years, not a requirement.

We found that the Coast Guard does not have current guidance explaining the process steps for Coast Guard officials to follow to systematically execute the manpower requirements determination process. Coast Guard officials told us they were using a combination of two documents to guide its manpower requirements determination process, and neither document was both current and comprehensive in terms of detailing the steps to follow. For example, the 2015 Staffing Logic and Manpower Requirements Manual contains individual process step requirements, but has been rescinded.<sup>43</sup> In contrast, the 2018

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<sup>41</sup>U.S. Coast Guard, *Manpower Requirements Plan, Report to Congress* (Apr. 13, 2018).

<sup>42</sup>U.S. Coast Guard, *Force Planning Construct Initial Report* (June 15, 2016).

<sup>43</sup>U.S. Coast Guard, *Coast Guard Staffing Logic and Manpower Requirements Manual: Volume III, Analyst Process Guide* (June 2015). The purpose of this guide is to provide an overview of the manpower requirements determination process and describe the roles and responsibilities of manpower requirements determination program personnel.

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Manpower Requirements Manual provides current policy, but does not include guidance on process steps that program officials are to follow.<sup>44</sup> In its 2018 manual, the Coast Guard rescinded the 2015 manual without replacing or affirming its process steps. Officials stated that analysts in the manpower requirements determination program use the rescinded 2015 guidance in executing the process because they have no other guidance to follow.

Officials in the manpower requirements determination program provided several reasons for why the program has not consistently ensured that all steps are completed. First, officials told us that completing a determination for each MRA had not always been a priority for the Coast Guard. Officials said that in some cases manpower requirements determinations were not completed due to disagreement among stakeholders about how to apply the results of the MRA. Officials said, for example, that while an MRA may find that a program is significantly understaffed, some stakeholders may argue against including the full scale of the shortfall in the determination due to limited resources and competing needs. Second, officials stated that some determinations were not completed because some programs requesting MRAs were not interested in obtaining the final determination upon receiving the MRA. Specifically, they explained that sometimes the program that requested to initiate the manpower requirements determination process is most interested in the staffing data contained in the MRA, rather than the final determination, which formalizes the trade-offs and results proposed in the MRA.<sup>45</sup>

Officials in the manpower requirements determination program told us that both the 2015 and 2018 manpower requirements determination guidance did not identify circumstances when a manpower requirements determination was not required to be completed for an MRA. Further, program officials told us that they were not aware that the process guidance they reported using required after-action reports. Coast Guard officials also stated that having the process guidance in a rescinded

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<sup>44</sup>U.S. Coast Guard, *Coast Guard Manpower Requirements Manual*, COMDTINST M5310.6 (July 13, 2018). Generally, a policy document outlines principles for implementing a program, while a process document outlines the steps for executing the related policy.

<sup>45</sup>Staffing data contained in the MRA includes preliminary recommendations for the number of personnel and mix of skills for the unit type being studied, based on its mission and required output.

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document had made their ability to implement and oversee the process a challenge due to the possibility of officials applying the guidance inconsistently. They further said they recognized the manpower requirements determination process was not clear and needed to be revised, and that doing so may help ensure officials consistently implement the process. In June 2019, officials said they planned to issue updated guidance, but had not established a timeframe for doing so. By issuing updated guidance for conducting manpower requirements determinations that outlines required process steps, and any circumstances in which the process steps do not need to be performed, the Coast Guard can better ensure that those responsible for implementing the process do so consistently.

Coast Guard Has Not Tracked the Extent of Manpower Requirements Analyses and Determinations Completed

In addition to requiring MRAs to be conducted every 5 years, the rescinded 2015 Coast Guard guidance, which officials reported using to execute the manpower requirements determination process, states that the manpower requirements determination program is to maintain and update a master list of MRAs conducted to enable the program to track and organize its workload.<sup>46</sup> However, the Coast Guard has not tracked the extent to which it has assessed Coast Guard unit types through the manpower requirements determination process, as required in the 2015 process guidance, which officials report is still in use. For example, in March 2019 Coast Guard officials stated that they did not maintain a list of MRAs or manpower requirements determinations completed since the program began in 2003, and they were not aware that maintaining a list was a requirement. Officials prepared a list to respond to our request, and in April 2019, provided us with a list of MRAs and determinations the Coast Guard had completed since 2003. However, we found that the list was not accurate. The Coast Guard's list underrepresented the number of MRAs completed by almost half. Specifically, it showed the Coast Guard had completed MRAs for 34 unit types since 2003, whereas our review of

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<sup>46</sup>U.S. Coast Guard, *Staffing Logic and Manpower Requirements Manual: Volume III, Analyst Process Guide (June 2015)*.

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Coast Guard documents found that the Coast Guard had completed MRAs for 63 unit types during this span.<sup>47</sup>

We also found that the Coast Guard had not accurately reported to Congress about its progress in assessing workforce requirements. While the list the Coast Guard compiled for us underrepresented the number of MRAs completed, the information it provided to Congress in its April 2018 report overrepresented the extent to which it has assessed its workforce needs. Specifically, in April 2018 the Coast Guard reported to Congress that it had recently analyzed workforce needs for 54 percent of its workforce using the manpower requirements determination process and its activity models. However, more than half of the MRAs it had completed had not been updated in the past 5 years, as Coast Guard guidance requires. We found that less than half of the Coast Guard's reported figure—21 percent of its workforce—is supported by a workforce analysis that has been updated in the last 5 years.

The Coast Guard's manpower requirements plan does not have time frames or milestones outlining how it plans to reach its manpower requirements determination goal of completing MRAs and determinations for its entire workforce. Coast Guard officials stated that their April 2018 Manpower Requirements Plan to Congress lays out their goal with respect to conducting manpower requirements determinations. However, this plan does not include time frames or milestones for completing determinations for all unit types, nor does it signal that the Coast Guard will track MRAs and determinations it has completed. Coast Guard officials stated that they were using a multi-year program to prioritize manpower studies and complete them as resources allowed. When asked for further information about this plan, officials stated that there was no specific document outlining the plan; rather, the intent of the 2018 Manpower Requirements Plan was to indicate their manpower analysis goal involves a multi-year journey. By updating its manpower requirements plan to include time frames and milestones for completing MRAs and determinations for all positions in all units, the Coast Guard

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<sup>47</sup>The Coast Guard provided the complete set of MRAs completed to date, from the first MRA conducted in 2003, through 2019. Using these reports, we calculated the number of unit types with a completed MRA. Typically, the Coast Guard completes one MRA for each unit type. However, some MRAs support multiple unit types, or multiple unit types are supported by one MRA. The Coast Guard has retired some unit types because they are no longer in active operation. As a result, we have removed these unit types from our analysis.

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can track progress toward its goal and make necessary adjustments in its planning, as needed.

The Coast Guard has reported on the importance of tracking and completing manpower requirements determinations to justify its resource allocation decisions. For example, its 2018 Manpower Requirements Manual states that methods to determine workforce requirements have historically varied from program to program. This variability prevented the Coast Guard from compiling reliable workforce data and comparing workforce needs across the Coast Guard. According to the 2018 manual, manpower requirements determinations enable key decision-makers to effectively manage workforce needs because they provide the data needed to objectively predict future manpower requirements and compare staffing needs across the entire workforce. By tracking and documenting the extent to which it has completed MRAs and determinations for its workforce, the Coast Guard will be better positioned to know which unit types have a defensible basis for the number and type of personnel needed to meet mission demands and to prioritize which MRAs to conduct.<sup>48</sup>

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### Coast Guard Does Not Have Information on the Resources Needed to Reach its Manpower Assessment Goal

The Coast Guard has not determined the resources—both staff and funding—it needs to meet its goal for its manpower requirements determination program to complete determinations for all units. Program officials told us that they have used the manpower requirements determination process for a limited share of its workforce because of resource limitations.

Coast Guard documents show that it has been almost 10 years since the Coast Guard last performed an MRA for the manpower requirements determination program to determine its own workforce needs. The 2010 analysis found that the program would require at least 30 full-time

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<sup>48</sup>In 2016, we recommended that the Coast Guard develop a systematic process that prioritizes MRAs for unit types that are the most critical for achieving mission needs. The Coast Guard concurred with our recommendation but has not yet implemented it. The Coast Guard reported that it planned to acquire or develop a database to make the process of tracking, updating, and prioritizing manpower analyses more efficient. Officials stated they had submitted resource proposals for several years to develop this database. However, leadership had not prioritized it for funding. While acquiring additional technology may be more efficient long-term, acquiring of new technology is not needed to track, update, and prioritize manpower analyses and determinations. See GAO, *Coast Guard: Actions Needed to Improve Strategic Allocation of Assets and Determine Workforce Requirements*, [GAO-16-379](#) (Washington D.C.: May 24, 2016).

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equivalent positions to accomplish the Coast Guard's goal of completing about 25 MRAs each year, which would enable it to assess the Coast Guard's 158 unit types roughly every 5 years. As of January 2020, the program had six analysts dedicated to conducting manpower analyses and, according to officials, may only be able to produce one MRA each year.<sup>49</sup>

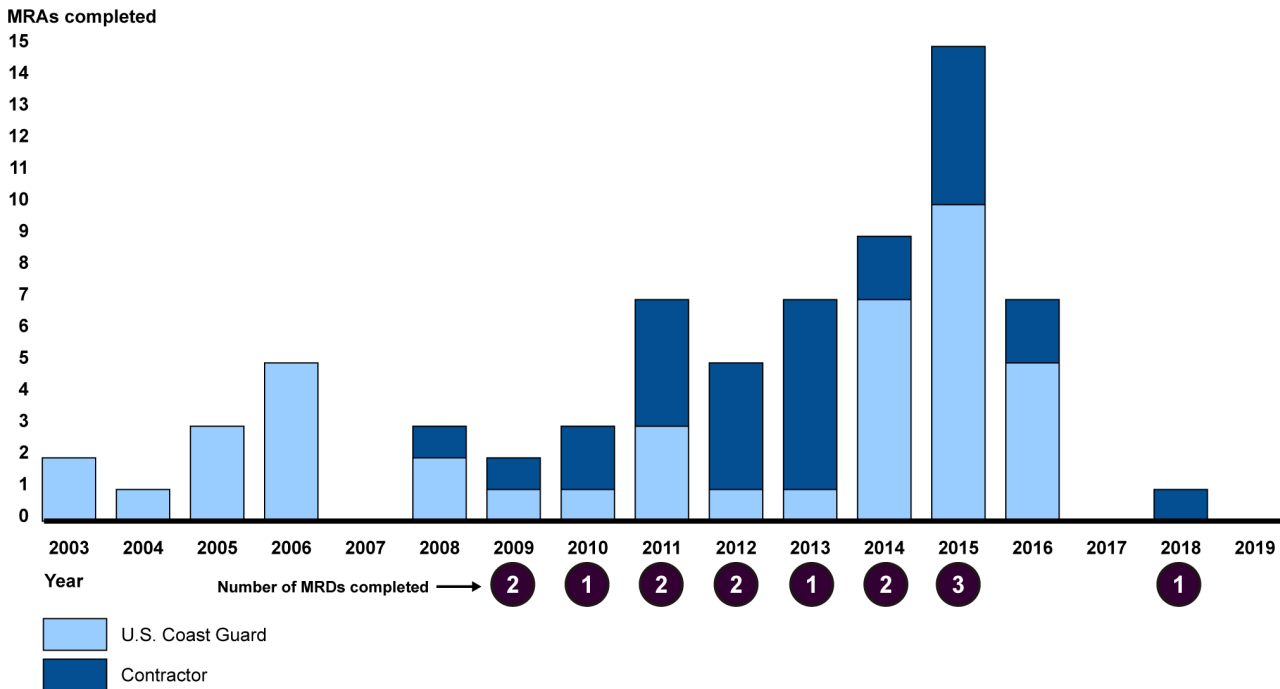
Program officials estimated that the cost of conducting an MRA may vary widely, from \$170,000 to more than \$5 million for more complex unit types. Nevertheless, program officials told us they generally did not track information on the costs of conducting MRAs. According to officials, the manpower requirements determination program cannot track all such costs because cost data is spread across different program offices. For example, officials stated that for contracted MRAs, contracting fees are easier to identify, but the manpower requirements determination program does not have access to other major costs, such as travel by officials conducting the analysis. While the manpower requirements determination program oversees the MRA process, and is tasked with ensuring manpower requirements determinations are completed for every unit in the Coast Guard, officials said that generally the program that is the subject of the MRA provides funding for the study, and only that program maintains access to travel costs associated with the MRA. They said the manpower requirements determination program does not request cost information from the programs requesting MRAs. Additionally, the manpower requirements determination program does not collect cost information from programs that conduct their own MRAs.

The Coast Guard has increasingly used contractors to complete MRAs. While the Coast Guard has not tracked the costs of conducting MRAs, Coast Guard analysis has shown that having MRAs completed by contractors is more costly than completing them in-house. Program officials said they have increasingly used contractors because of staffing limitations. For example, from calendar years 2010 through 2019, contractors completed nearly half of the Coast Guard's 54 MRAs. Figure 7 shows the MRAs and manpower requirements determinations completed by the Coast Guard and contractors from 2003 through 2019.

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<sup>49</sup>Specifically, officials stated that the program typically consists of two civilian subject matter experts and four active duty support analysts.

**Figure 7: Manpower Requirements Analyses (MRA) and Manpower Requirements Determinations (MRD) Completed by U.S. Coast Guard and Contractors, Calendar Years 2003 through 2019**



Source: GAO analysis of U.S. Coast Guard reports. | GAO-20-223

Note: Years without a number of MRDs completed noted indicate that the Coast Guard completed no MRDs that year.

Coast Guard guidance states that in a resource constrained environment, leaders need to make risk-based decisions to prioritize tasks and optimally allocate resources to execute its missions.<sup>50</sup> In addition, our work in the area of strategic human capital management has shown that reassessing resource requirements helps organizations to achieve their missions and match resources to their needs.<sup>51</sup> Developing information on the resources needed for staffing and funding the manpower requirements determination program to achieve its manpower goal would better position the Coast Guard to make informed trade-off decisions and allocate its limited resources to those units most in need of manpower requirements determinations.

<sup>50</sup>Force Planning Construct Initial Report (June 15, 2016).

<sup>51</sup>GAO-02-373SP.

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## Conclusions

The Coast Guard's roles and responsibilities have grown over the past two decades following the terrorist attacks of 9/11. Among other things, increased national security roles, first response duties during natural disasters, and compliance duties for ensuring the safety of increased commercial maritime activity have underscored the importance of the Coast Guard's multiple missions. Organizational changes it made through the modernization effort were intended to realign operations and support functions. To that end, the creation of headquarters organizations achieved modernization's initial goals. However, the Coast Guard continues to change as a result of modernization, and it has placed less effort on ensuring achievement of the longer-term goals of creating a more efficient and effective organization. Establishing a process for tracking and measuring the effectiveness of the organizational changes brought on by modernization, including measuring employee satisfaction, would better position Coast Guard to understand whether its goals have been achieved.

The Coast Guard reported to Congress in April 2018 that it faced challenges in meeting its daily mission demands because it was operating below the workforce necessary to meet its mission demands. However, the service does not have a complete picture of the workforce necessary to meet its mission demands or whether its existing mix of personnel is efficiently and effectively allocated across units. The Coast Guard considers its manpower requirements determination process instrumental in determining the workforce needed to perform its duties, and the foundation of models the Coast Guard uses to determine workforce size in times of contingency or heightened security. Updated guidance for its staff tasked with conducting such assessments would enable the Coast Guard to better ensure that the process is fully implemented.

Further, as of January 2020, the Coast Guard had updated analyses for a small fraction of its workforce, and had not updated its Manpower Requirements Plan with time frames and milestones for achieving its goal of assessing its entire workforce. Additionally, it does not have information on the extent to which analyses have been completed over the years or the resources it needs to complete assessments for its entire workforce. By tracking and updating the completion of MRAs and determinations, updating its plan to complete manpower requirements determinations, and obtaining information on the resources needed to implement such a plan, the Coast Guard will better ensure that it has the right number of people with the right set of skills to meet its mission demands. In this way, the Coast Guard will be better positioned to inform Congress of its workforce and associated resource needs.



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## Recommendations for Executive Action

We are making the following six recommendations to the Coast Guard:

The Commandant of the Coast Guard should establish a systematic mechanism to track implementation and measure the Coast Guard's progress in achieving organizational change goals. (Recommendation 1)

The Commandant of the Coast Guard should establish a mechanism to periodically seek and monitor employee satisfaction with organizational change efforts. (Recommendation 2)

The Commandant of the Coast Guard should update its Manpower Requirements Manual with guidance for how to execute its manpower requirements determination process, and take steps to ensure the process is implemented. (Recommendation 3)

The Commandant of the Coast Guard should track and document the extent to which it has completed manpower requirements analyses and determinations for each unit type. (Recommendation 4)

The Commandant of the Coast Guard should update its April 2018 Manpower Requirements Plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units. (Recommendation 5)

The Commandant of the Coast Guard should determine the resources its manpower requirements determination program needs, both staff and funding, to achieve its goal of completing manpower requirements determinations for all positions and units. (Recommendation 6)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided comments, reproduced in appendix V. DHS concurred with our six recommendations and described actions planned to address them. DHS also provided technical comments, which we incorporated into the report, as appropriate.

With regard to our first recommendation, DHS stated that the Coast Guard's Office of Resources, Organizational Analysis, and Workforce Management will update the Coast Guard Organizational Manual to establish policy requiring that requests to change organizational structure include a plan, and establish a mechanism to track implementation and measure progress in achieving organizational change goals. The Coast Guard estimated completing the effort by December 31, 2020.

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With regard to our second recommendation, DHS stated that Coast Guard leadership agrees that mechanisms to periodically seek and monitor employee satisfaction with organizational change efforts are valuable. DHS stated that the Coast Guard already conducts periodic surveys and each of these instruments provide opportunities for the workforce to provide feedback, including on organizational issues, and that it seems preferable for survey owners to add questions to existing surveys, as opposed to implementing new survey instruments. DHS requested GAO consider the recommendation as implemented because such feedback mechanisms were already in place, and therefore establishing new mechanisms was unnecessary. As we note in our report, it is important that the Coast Guard identify challenges, if any, to meeting the goals of organizational change in a timely manner. We found the Coast Guard's current surveys do not capture employee perspectives as organizational changes are implemented. In determining whether to close this recommendation, we will review Coast Guard documentation demonstrating that the Coast Guard has modified its existing surveys with added questions that monitor employee satisfaction with organizational changes, and that it has plans for implementing the surveys in a timely manner.

With regard to our third recommendation, DHS stated that the Coast Guard's Office of Human Resources Strategy and Capability is developing a Tactics, Techniques and Procedures document to provide guidance for executing the manpower requirements determination process. The document will provide additional guidance on the overall MRD process, including explicit directions for the collection and analysis of manpower data, and will establish Coast Guard enterprise standards for key factors and allowances used when conducting manpower analysis. The Coast Guard estimated completing the effort by September 30, 2020.

With regard to our fourth recommendation, DHS stated that in December 2019 the Coast Guard's Office of Human Resources Strategy and Capability initiated the process to document and track manpower requirements in the Coast Guard's system of record. The Coast Guard estimated completing the effort by December 31, 2020.

With regard to our fifth recommendation, DHS stated that the Coast Guard's Assistant Commandant for Human Resources Directorate would update its Manpower Requirements Plan during the next periodic report submitted to Congress, due in fiscal year 2022. The Coast Guard estimated completing the effort by March 31, 2022.

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With regard to our sixth recommendation, DHS stated that the Coast Guard's Office of Human Resources Strategy and Capability will review its September 2010 MRA, revalidate the inputs, and update the findings of the MRA to reflect the current needs of the manpower requirements determination program. The Coast Guard estimated completing the effort by September 30, 2020.

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We are sending copies of this report to the appropriate congressional requesters, the Secretary of the Department of Homeland Security, and other interested parties. 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) 512-3841 or [AndersonN@gao.gov](mailto:AndersonN@gao.gov). GAO staff who made key contributions to this report are listed in appendix VI.



Nathan J. Anderson  
Director, Homeland Security and Justice

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# Appendix I: Objectives, Scope and Methodology

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This appendix provides additional information on our objectives, scope and methodology. This report examines (1) how the Coast Guard modernized its organization and the extent to which it has applied key reform practices to its organizational change efforts and (2) the extent to which the Coast Guard has assessed its workforce needs.

To address our first objective we analyzed Coast Guard documents related to the modernization effort. The documents included policies and guidance regarding how the effort was to be implemented, as well as descriptions of the status of these efforts. To evaluate the extent to which the Coast Guard applied key reform practices and considerations for evaluating organizational change efforts we assessed Coast Guard policies and procedures related to Coast Guard operations against the key practices we outlined in our June 2018 report on government reorganization.<sup>1</sup> We collected and analyzed documentation related to Coast Guard's actions taken to implement organizational change efforts such as the modernization effort and the integration of the Coast Guard's reserve component into the headquarters governance structure. We assessed these reports, data and documents against selected criteria for key practices and considerations for agency reorganization identified in our June 2018 report.

We selected relevant key practices by examining each of the potential four categories and 12 subcategories identified in our June 2018 report to determine the extent to which the practices under each applied to the

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<sup>1</sup>See GAO, *Government Reorganization: Key Questions To Assess Agency Reform Efforts*, [GAO-18-427](#) (Washington, D.C.: June 2018). We also reviewed related GAO work on reorganizations and transformation to help define the key practices and considerations identified in [GAO-18-427](#). See *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).

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Coast Guard’s modernization and reserve component integration efforts.<sup>2</sup> The four categories are Goals and outcomes,” “Process for developing reforms,” “Implementing the reforms,” and “Strategically managing the federal workforce.”

We deemed two subcategories under the category of “Implementing the reform”, “Leadership focus and attention” and” Managing and monitoring” and one subcategory “Strategic workforce planning” under the “Strategic planning for the federal workforce” category as relevant criteria for assessing the Coast Guard’s modernization efforts. We deemed the remaining nine subcategories not relevant to the Coast Guard’s modernization efforts since modernization was implemented in 2006 and retrospective analysis of these criteria would not result in the agency being able to make changes. For the three subcategories included in our assessment, we determined seven key practices from these subcategories that were most relevant to the Coast Guard’s modernization efforts and applied those practices to our assessment. We reviewed Coast Guard documentation and then made qualitative determinations about the extent to which the Coast Guard’s implementation of its modernization efforts addressed these criteria. A second analyst independently reviewed and validated each determination. We evaluated the Coast Guard’s actions against key reform practices to determine if they were generally, partially, or not at all applied.

- **Generally applied.** Agency documentation demonstrated that Coast Guard officials substantially applied applicable key practices.
- **Partially applied.** Agency documentation demonstrated that Coast Guard officials applied some key practices but not to a significant degree.

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<sup>2</sup>In this report, we identified 58 key questions to consider for the development and implementation of agency reforms, based on our prior work. We used the term “reforms” to broadly include any organizational changes—such as major transformations, mergers, and other reorganizations—and efforts to streamline and improve the efficiency and effectiveness of government operations. We define “efficiency” as maintaining federal government services or outcomes using fewer resources (such as time and money) or improving or increasing the quality and quantity of services or outcomes while maintaining (or reducing) resources. Based on this determination, we selected relevant key practices from these 58 questions and assessed the Coast Guard’s implementation of its modernization against seven key practices under two categories and three subcategories we deemed relevant. Further, we assessed the Coast Guard’s reorganization of its reserve component against 19 selected key practices under four categories and seven subcategories we deemed relevant.

- **Not at all applied.** Agency documentation did not demonstrate that Coast Guard officials applied key practices.

We deemed the following seven subcategories under the four categories as relevant criteria for assessing the Coast Guard’s reserve component Integration efforts: “Establishing goals and outcomes,” “Involving employees and key stakeholders,” “Using data and evidence,” “Addressing high risk and Longstanding management challenges,” “Leadership focus and attention,” “Managing and monitoring,” and “Strategic workforce planning.” We determined that the remaining three subcategories were not relevant to the Coast Guard’s reserve component integration efforts because we deemed the key practice more applicable to a government-wide effort or determined that it was too early to consider as the reserve integration effort was in its initial implementation stage. For the seven subcategories included in our assessment, we determined 19 key practices from these subcategories were most relevant to the Coast Guard’s reserve component integration efforts and applied those practices to our assessment.

We reviewed Coast Guard documentation and made qualitative determinations about the extent to which the Coast Guard’s reserve component Integration actions addressed these criteria. A second analyst independently reviewed and validated each determination. We assessed the Coast Guard’s actions using the modernization effort scale: (1) Generally applied; (2) Partially applied; (3) Not applied; and (4) Minimally applied.

- **Minimally applied.** Agency documentation demonstrated that Coast Guard officials applied a limited number of key practices with significant gaps associated with each key practice.

Our determinations are preliminary observations of the effort because Coast Guard’s reserve component organizational effort was in its nascent stages during our review. This presented several challenges in determining the point at which Coast Guard actions justify a rating of generally applied and partially applied. We applied the following decision rules to resolve these discrepancies:

- If one practice of the subcategory was rated partially applied, then we concluded that the subcategory as a whole partially applied.
- If one practice of the subcategory was rated generally applied, but one or more other key practices as either partially applied or not at all applied, then we concluded that the subcategory as a whole partially applied.

- If one practice of the subcategory was rated partially applied, but one or more other key practices rated either minimally applied or not at all applied, then we concluded that the subcategory as a whole minimally applied.

We interviewed cognizant officials at Coast Guard headquarters, and field units, including the Atlantic and Pacific Area commands, and two Coast Guard districts and two Coast Guard sectors collocated with them.<sup>3</sup> We interviewed officials from the two area commands because of their role in implementing organizational changes, and the districts and sectors for their perspectives on the Coast Guard workforce assessment process. Headquarters and field officials interviewed were responsible for the overall management of their organization in addition to officials responsible for facilitating the implementation of organizational change efforts. We reviewed prior GAO reports on organizational realignment, Coast Guard organizational changes, and high-risk issues in the federal government.<sup>4</sup> In addition, we reviewed other reports evaluating long-standing agency management challenges.<sup>5</sup> Finally, we reviewed documents and information on these organizational change efforts and compared them against Coast Guard guidance on organizational changes.<sup>6</sup>

To address our second objective, we analyzed Coast Guard documents related to management tools the Coast Guard has developed to

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<sup>3</sup>In Norfolk, VA, we visited the Atlantic Area command, District 5, and Sector Virginia. In the San Francisco Bay Area, we visited the Pacific Area Command, District 11, and Sector San Francisco.

<sup>4</sup>*High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019);

<sup>5</sup>See Department of Homeland Security, *Integrated Strategy for High-Risk Management*, (Washington, D.C.: April 2019) and Department of Homeland Security, *Major Management and Performance Challenges Facing the Department of Homeland Security*, OIG-18-11 (Washington, D.C.: Nov. 3, 2017).

<sup>6</sup>See U.S. Coast Guard, *Coast Guard Organizational Manual*, COMDTINST M5400.7F (Jan 27, 2015).

determine its workforce requirements and identify personnel needs.<sup>7</sup> Documentation included guidance and analysis related to developing workforce staffing needs, and strategies that set out the Coast Guard's stated human capital principles. As with the first objective, we interviewed cognizant officials at Coast Guard headquarters, its Atlantic and Pacific area commands, and the two Coast Guard districts and two sectors collocated with them. Headquarters officials we interviewed were responsible for the development of manpower requirements and overseeing implementation of workforce assessments for Coast Guard units. We also reviewed prior GAO reports on workforce planning and Coast Guard personnel issues. Finally, we reviewed documents and information on these efforts to assess workforce requirements, and compared them against Coast Guard guidance on organizational changes for conducting the manpower requirements determination process, and our prior work related to strategic human capital management.<sup>8</sup>

To assess the extent to which the Coast Guard has supported its workforce with manpower requirements analyses and determinations, we analyzed all manpower requirements analysis (MRA) and determination documents the Coast Guard completed from 2003, when it began implementing the manpower requirements determination process, through calendar year 2019, the last full year of data available at the time of our review. Specifically, we requested the entire collection of MRA and determination documents from the Coast Guard. We then requested the number of positions that make up each unit type with a completed MRA. We assessed the reliability of the Coast Guard's data through electronic testing, reviewing documentation, and interviewing Coast Guard headquarters and field unit officials regarding how these data were collected and used. We determined that these data were sufficiently

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<sup>7</sup>In our prior work, we assessed Coast Guard workforce planning against GAO principles for effective strategic workforce planning, which includes that agencies should determine the critical skills and competencies that will be needed to achieve current and future programmatic results. Requirements for strategic workforce planning in Coast Guard's 2016 Human Capital Strategy are consistent with this principle. See GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003) and *Coast Guard: Actions Needed to Improve Strategic Allocation of Assets and Determine Workforce Requirements*, [GAO-16-379](#) (Washington D.C.: May 24, 2016).

<sup>8</sup>See U.S. Coast Guard, *Coast Guard Organizational Manual*, COMDTINST M5400.7F (Jan. 27, 2015), Manpower Requirements Plan (Apr. 13, 2018), U.S. Coast Guard, *Coast Guard Staffing Logic and Manpower Requirements Manual: Volume III, Analyst Process Guide* (June 2015), GAO, *A Model of Strategic Human Capital Management*, [GAO-02-373SP](#) (Washington, D.C.: Mar. 15, 2002).



reliable for determining the number of positions within each type of Coast Guard unit. With this information, for every MRA and determination completed, we calculated the number of positions in the Coast Guard's workforce supported by available data.

We conducted this performance audit from December 2018 to February 2020 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 II: Overview of the Coast Guard's Modernization Effort Case for Change, Intended Goals, and Examples of Key Actions Taken, Calendar Years 2006 - 2015

In 2006, the Commandant of the Coast Guard issued 10 Commandant Intent Action Orders intended to address elements of the Coast Guard's command and control structure, mission support systems, and business processes that were identified as detracting from mission execution.

Table 2 provides an overview of the issues that drove the Coast Guard's modernization effort, the intended goals for the effort as outlined in the 2006 Commandant Intent Action Orders, and examples of key actions the Coast Guard has taken to address the goals.<sup>1</sup>

**Table 2: Overview of the U.S. Coast Guard's Modernization Effort Case for Change, Intended Goals, and Examples of Reported Key Actions Taken (2006 through 2015)**

Examples of issues driving organizational changes	Intended goals (based on plans outlined in 2006 Commandant Intent Action Orders)	Examples of reported key actions taken to address goals
<ul style="list-style-type: none"> <li>Acquisition issues identified by GAO and other studies.</li> <li>Patchwork system gaps, overlaps, and inefficient "work around" processes, and confusion among service members and stakeholders.</li> <li>Reserve governance structure not optimally integrated at the headquarters level.</li> </ul>	<p>Order 1 - Acquisition Directorate and the Integrated Deepwater System Consolidation. Consolidate the Acquisition Directorate with the Integrated Deepwater System Directorate to improve the effectiveness and efficiency of the Coast Guard's total acquisitions system.</p> <hr/> <p>Order 4 – Logistics organizational alignment. Realign the Coast Guard's logistics organization to reduce the support burden on field units, control costs, drive enterprise decision making, and improve accountability.</p> <hr/> <p>Order 8 – Human resources strategies to support Coast Guard maritime strategy. Create a human resources strategy to better support Coast Guard mission execution.</p> <hr/> <p>Order 9 – Reserve component mission support system. Develop a plan to align the Coast Guard Reserve component mission support system to ensure the optimal organization, administration, recruiting, instruction, development, and training of reserve component forces.</p> <hr/> <p>Order 10 – Service-oriented architecture implementation. Implement a service-oriented architecture to better support the Coast Guard's technological needs.</p>	<p>Establishment of the Deputy Commandant for Mission Support at Coast Guard headquarters to oversee all support and logistics systems and processes</p> <ul style="list-style-type: none"> <li>Established mission support directorates – Acquisition; Engineering and Logistics; Human Resources; and Command, Control, Communications, Computers and Information Technology</li> <li>Established logistics and service centers</li> <li>Issued Human Capital Strategy in 2016</li> </ul>

<sup>1</sup>These are examples of actions reported by the Coast Guard. We did not assess the extent to which the actions were achieved or addressed respective issues and intended goals.

**Appendix II: Overview of the Coast Guard's  
Modernization Effort Case for Change,  
Intended Goals, and Examples of Key Actions  
Taken, Calendar Years 2006 - 2015**

Examples of issues driving organizational changes	Intended goals (based on plans outlined in 2006 Commandant Intent Action Orders)	Examples of reported key actions taken to address goals
<ul style="list-style-type: none"> <li>Separate quick-response teams for law enforcement, counterterrorism, pollution, and national defense missions.</li> </ul>	<p>Order 3 - Deployable Operations Group implementation. Establish a Deployable Operations Group to integrate Coast Guard special deployable forces into the Coast Guard's trident force structure, which also includes shore-based forces (e.g., small boat stations, aids to navigation teams) and maritime patrol forces (e.g., major cutters, fixed-wing aircraft).</p>	<p>Establishment for the Deputy Commandant for Operations at Coast Guard headquarters to manage all operational programs and develop policy and regulations.</p>
<ul style="list-style-type: none"> <li>Confusion among Coast Guard service members and Coast Guard customers.</li> </ul>	<p>Order 2 – Transition headquarters to numbered staff offices (CG-1, CG-2, etc.). Complete the reorganization of headquarters staff into numbered offices to better align with the Department of Defense and make the headquarters organization more understandable to internal and external Coast Guard customers.<sup>a</sup></p>	<p>Establishment of the Coast Guard Operations Command.<sup>b</sup></p>
<ul style="list-style-type: none"> <li>Separate field cultures, procedures and practice which led to disputes.</li> <li>Maintaining service readiness in the face of increasing responsibilities to respond to a wide array of demands and challenges including emerging threats and natural disasters.</li> </ul>	<p>Order 7 – Assessment of Coast Guard command and control organization. Develop an operational framework for the Coast Guard that provides greater focus on the command and control structure needed to effectively execute missions and ensure service readiness.</p>	<p>Establishment of Force Readiness Command.<sup>c</sup></p>
<ul style="list-style-type: none"> <li>Fragmented and outdated budgetary and financial system.</li> </ul>	<p>Order 5 – Financial management transformation and audit remediation. Transform the Coast Guard financial system to improve accuracy, accountability, and alignment with the Department of Homeland Security.</p>	<p>Strategic Transformation of Coast Guard headquarters and financial management systems and processes.</p>
<ul style="list-style-type: none"> <li>Lack of Coast Guard-wide long term strategy to address meeting emerging threats and responsibilities.</li> </ul>	<p>Order 6 – Maritime strategy and the Evergreen cycle of strategic renewal. Develop a comprehensive direction document to provide a strategic framework for planning maritime safety, security, and stewardship responsibilities for the Coast Guard through the next 4 years.</p>	

Source: GAO Analysis of U.S. Coast Guard documentation | GAO-20-223

<sup>a</sup>Action order #2 also applies to one other effort of the Coast Guard's modernization program—the strategic transformation of Coast Guard headquarters and financial management systems and processes.

<sup>b</sup>The Coast Guard discontinued plans for establishing an operations command in 2010 in favor of keeping management of operations at the field level.

<sup>c</sup>The Coast Guard changed its plan for the Force Readiness Command and reduced its responsibilities to managing training and assessment.

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# Appendix III: Extent to Which the Coast Guard's Reorganization of its Reserve Component Applied Key Reform Practices

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The Coast Guard's reserve component is its only workforce dedicated to respond to contingency operations such as natural and manmade disasters. The Coast Guard found that demand for reserve forces to augment its active duty workforce had grown as the service was called to respond to more contingencies. In 2006, under its organizational modernization effort, the Coast Guard issued a goal to optimize the use of the reserve component by ensuring the reserve workforce had the necessary training and support. The Coast Guard shifted governance of the reserve component under the Deputy Commandant for Mission Support; however under this structure, the Coast Guard did not take into account the difference between the reserves workforce being considered a program as opposed to a distinct component of the United States military. As such, in 2018, the Coast Guard chartered a project team to evaluate the state of the reserve component's governance and develop alternate options to better integrate the reserves into the Deputy Commandant for Operations.

In 2019, the Coast Guard integrated its reserve component into its Deputy Commandant for Operations governance structure. Officials told us that the goals for the new reserve component organization are to provide headquarters decision-makers enhanced visibility of operational readiness, competencies assigned and attained, and to use predictive modeling to look 2 or 3 years ahead to anticipate readiness posture and administrative readiness. They noted that achieving these goals relies on better data collection and developing metrics that can capture Coast Guard-wide information. Officials told us that, as of June 2019, the new organization was at initial operational capacity using existing staff.

Table 3 provides our assessment of the extent to which the Coast Guard's actions to reorganize its reserve component governance structure had applied key reform practices and examples of actions and deficiencies.<sup>1</sup>

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<sup>1</sup>See appendix I for detailed information about the process we used to select relevant key practices for this effort.

**Appendix III: Extent to Which the Coast Guard's Reorganization of its Reserve Component Applied Key Reform Practices**

**Table 3: Extent to Which the U.S. Coast Guard's Reorganization of its Reserve Component Governance Structure Applied Key Reform Practices and Examples of its Actions and Deficiencies**

<b>Category</b>	<b>Subcategory</b>	<b>Key Practices</b>	<b>Assessment</b>	<b>Examples of actions and deficiencies</b>
Goals and Outcomes	Establishing Goals and Outcomes	Goals and measures	Minimally Applied	<ul style="list-style-type: none"> <li>Does not have finalized documentation that demonstrates outcome-oriented goals and performance measures to assess the progress of the effort.</li> <li>Does not have finalized documentation that demonstrates a timeline for implementing the effort beyond initial operating capability.</li> </ul>
		Costs and benefits		
		Upfront funding		
Process for Developing Reforms	Involving Employees and Key Stakeholders	Stakeholder outreach	Partially Applied	<ul style="list-style-type: none"> <li>Provided documentation demonstrating that internal stakeholder feedback was obtained during the early planning stage of the reform, such as the Reserve Governance Integrated Project Team, and the initial organizational modification request process.</li> <li>Did not demonstrate that external input, such as from Congress, was obtained during the development process.</li> </ul>
		Transparency		
	Using Data and Evidence	Using data	Minimally Applied	<ul style="list-style-type: none"> <li>Did not demonstrate the extent to which data was used to justify the selected governance course of action, for example cost –benefit analyses.</li> <li>Does not have finalized Integrated Project Team report that outlines the work conducted by the integrated project team including information sources, methodology, and gap analysis.</li> </ul>
Addressing High Risk Areas and Longstanding Management Challenges	Data reliability	Minimally Applied		
	High-risk and other challenges		<ul style="list-style-type: none"> <li>Efforts to develop strategic direction and doctrine to help address challenges are currently in their formative stage.</li> <li>Did not demonstrate that there is a process for monitoring the effects of the effort on high-risk areas and challenges.</li> </ul>	
Proven approach				
Monitor effects				
Implementing the Reforms	Leadership Focus and Attention	Defined leaders	Partially Applied	<ul style="list-style-type: none"> <li>Identified current leadership and key stakeholders responsible for implementation moving forward.</li> <li>Outlined a case for change through the organizational modification request.</li> <li>Did not demonstrate that there is a process for ensuring continuous leadership commitment to achieving the goals of the effort.</li> </ul>
		Identify case for change		
		Dedicated implementation team		
Managing and Monitoring	Managing and Monitoring	Hold leaders accountable	Minimally Applied	<ul style="list-style-type: none"> <li>Does not have finalized implementation plan with plan of actions and milestones beyond reaching initial operating capability including</li> </ul>
		Track implementation progress		
		Continuity of services		

**Appendix III: Extent to Which the Coast Guard's Reorganization of its Reserve Component Applied Key Reform Practices**

<b>Category</b>	<b>Subcategory</b>	<b>Key Practices</b>	<b>Assessment</b>	<b>Examples of actions and deficiencies</b>
		Process to measure progress		<ul style="list-style-type: none"> <li>filling in billet gaps.</li> <li>Does not have finalized documentation that demonstrates the development of a process to collect data to measure the success of the effort including metrics.</li> </ul>
Strategically Managing the Federal Workforce	Strategic Workforce Planning	Assess effects on workforce	Minimally Applied	<ul style="list-style-type: none"> <li>Has not developed and implemented workforce planning tools necessary to calculate needed reserve force. This will be a major effort but there are no time frames for completing it.</li> </ul>

Legend:

Generally applied = the agency documentation demonstrated that Coast Guard officials substantially applied applicable key practices.

Partially applied = the agency documentation demonstrated that Coast Guard officials applied some applicable key practices, but not to a substantial degree

Minimally applied = the agency documentation demonstrated that Coast Guard officials applied a limited number of key practices with significant gaps in actions associated with each key practice

Not applied = the agency documentation did not demonstrate that Coast Guard officials applied applicable key practices

Source: GAO analysis of Coast Guard information GAO-20-223

# Appendix IV: Coast Guard Manpower Requirements Determination Process Completed from Calendar Years 2014 - 2019

From calendar years 2014 through 2019, the Coast Guard implemented the manpower requirements determination process for 30 of its 158 unit types.<sup>1</sup> The Coast Guard completed manpower requirements analyses for 30 unit types. Of these 30 manpower requirements analyses, the Coast Guard completed required manpower requirements determinations—establishing a manpower requirement—for only four of these 30 unit types.

Table 4 shows the most recent manpower requirements analyses, and corresponding determinations, completed from calendar years 2014 through 2019.

**Table 4: U.S. Coast Guard Manpower Requirements Analyses and Determinations Completed, Calendar Years 2014 through 2019**

Unit Type	Manpower Requirements Analysis Date Completed	Manpower Requirements Determination Date Completed
Port Security Unit	January 2014	
Station New York Galley	March 2014	
Regional Dive Locker - Pacific	March 2014	
Personnel Service Center	June 2014	
C27 Asset Project Office	June 2014	
National Security Cutter (Direct Support) <sup>a</sup>	July 2014	April 2015
Fast Response Cutter (Sentinel Class) <sup>b</sup>	September 2014	April 2015
Educating and Training Quota Management Center	October 2014	
Assistant Commandant for Resources Staff	October 2014	
Security Center	January 2015	August 2015
Aviation Technical Training Center	February 2015	
Training Center Yorktown	April 2015	
Coast Guard Recruiting Command	April 2015	
Chaplain of the Coast Guard (Religious Ministries)	June 2015	
Civilian Human Resources Diversity & Leadership Directorate	June 2015	
Special Missions Training Center	June 2015	

<sup>1</sup>Unit types are assets, such as the National Security Cutter, or offices, such as the Office of Civilian Human Resources, that perform the same mission function. Typically, the Coast Guard completes one manpower requirements analysis (MRA) for each unit type. However, some MRAs support multiple unit types, or multiple unit types are supported by one MRA. For the purposes of this report, a unit type is defined as a group of units with a similar function, or groups of personnel requiring manpower analysis, as determined by the Coast Guard.

**Appendix IV: Coast Guard Manpower  
Requirements Determination Process  
Completed from Calendar Years 2014 - 2019**

<b>Unit Type</b>	<b>Manpower Requirements Analysis Date Completed</b>	<b>Manpower Requirements Determination Date Completed</b>
Office of Logistics Program Management	September 2015	
Maritime Law Enforcement Academy	September 2015	
Aviation Forces	September 2015	
Rotary Wing Air Intercept Mission at National Capitol Region Air Defense	October 2015	
Training Center Petaluma	October 2015	
Leadership Development Center	November 2015	
Maritime Force Protection Unit	December 2015	
Regional Dive Locker - East & West	February 2016	
Aviation Training Center	June 2016	
Training Center Cape May	July 2016	
National Vessel Documentation Center	September 2016	
Health Safety Work Life Service Center	September 2016	
Regional Dive Locker Logistics Services	November 2016	
Vessel Traffic Service	March 2018	September 2018

Source: GAO analysis of Coast Guard information | GAO-20-223

<sup>a</sup>The Coast Guard updated this manpower requirements analysis in June 2015.

<sup>b</sup>The Coast Guard updated this manpower requirements analysis in December 2016.



# Appendix V: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

February 7, 2020

Nathan J. Anderson  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-20-223, "COAST GUARD: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs"

Dear Mr. Anderson:

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

The Department is pleased to note GAO's acknowledgement that the Coast Guard is working to apply all seven key practices for agency reform to its modernization effort. The Coast Guard recognizes the value of improving its enterprise-wide approach to assessing workforce needs thus better enabling leadership to make well informed resource trade-off decisions across all of its programs. The Coast Guard remains committed to its goals of creating a more efficient and effective agency.

The draft report contained six recommendations with which the Department concurs. Attached find our detailed response to each recommendation. Technical comments were previously provided under a separate cover.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim H. Crumpacker".

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendations  
Contained in GAO-20-223**

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Establish a systematic mechanism to track implementation and measure the Coast Guard's progress in achieving organizational change goals.

**Response:** Concur. The Coast Guard Office of Resources, Organizational Analysis, and Workforce Management will update the Coast Guard Organizational Manual, COMDTINST M5400.7, to establish policy requiring that requests to change organizational structure include a plan, and establish a mechanism, to track implementation and measure progress in achieving organizational change goals. Estimated Completion Date (ECD): December, 31 2020.

**Recommendation 2:** Establish a mechanism to periodically seek and monitor employee satisfaction with the organizational change efforts.

**Response:** Concur. Coast Guard leadership agrees that mechanisms to periodically seek and monitor employee satisfaction with organizational change efforts are valuable. However, feedback mechanisms like this are already in place, and therefore it is unnecessary to establish any new mechanisms.

Specifically, the Coast Guard already conducts numerous periodic surveys to assess employee satisfaction, including the: (1) Organizational Assessment Survey (OAS); (2) Leadership Assessment Survey; (3) Federal Employee Viewpoint Survey (FEVS); (4) Career Intentions Survey; (5) Occupational Analyses (OA); (6) Defense Organizational Climate Survey (DEOCS); and (7) Service Academy Gender Climate Survey; as well as (8) various Command Safety Surveys.

For example, the OAS, FEVS, and DEOCS all ask specific questions related to job satisfaction (e.g., OAS Q99-Considering everything, how satisfied are you with your current job; OAS Q101-Considering everything, how would you rate your overall satisfaction in the Coast Guard at the present time; DEOCS Q33-I like my current job; DEOCS Q34-I feel satisfied with my current job; and DEOCS Q35-I am happy with my current job).

Each of these surveys provide numerous opportunities for the workforce to provide feedback on issues, including organizational change efforts, and to voice concerns and help foster an inclusive and healthy state of affairs for the future of our Service. The Coast Guard is also concerned that an increase in the number of surveys would diminish response rates for existing surveys. For example, since 2015, the biennial OAS survey experienced three consecutive cycles of response rate decline as additional surveys were implemented. Accordingly, it seems preferable for survey owners to add questions to existing surveys as opposed to the Coast Guard implementing new survey instruments.

We request that the GAO consider this recommendation resolved and closed, as implemented.

**Recommendation 3:** Update its Manpower Requirements Manual with guidance for how to execute its manpower requirements determination process, and take steps to ensure the process is implemented.

**Response:** Concur. The Coast Guard Office of Human Resources Strategy and Capability is developing a Tactics, Techniques and Procedures (TTP) document to provide guidance for executing the manpower requirements determination (MRD) process. The TTP will also provide additional guidance on the overall MRD process, including explicit directions for the collection and analysis of manpower data, and will establish Coast Guard enterprise standards for key factors and allowances used when conducting manpower analyses. The Coast Guard intends that this TTP will fill any gaps between the current Manpower Requirements Determination Manual and the rescinded Staffing Logic and Manpower Requirements Manual. ECD: September 30, 2020.

**Recommendation 4:** Track and document the extent to which it has completed manpower requirements analyses and determinations for each unit type.

**Response:** Concur. In December 2019, the Coast Guard Office of Human Resources Strategy and Capability initiated the process to document and track Manpower Requirements in the Coast Guard's human resources system of record (Direct Access). ECD: December 31, 2020.

**Recommendation 5:** Update its April 2018 Manpower Requirements plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units.

**Response:** Concur. The Coast Guard Assistant Commandant for Human Resources Directorate will update its Manpower Requirements Plan during the next periodic report submitted to Congress. In accordance with Title 14, U.S. Code § 5104, "Manpower Requirements Plan," the next required report is due in Fiscal Year 2022. ECD: March 31, 2022.

**Recommendation 6:** Determine the resources its manpower requirements determination program needs, both staff and funding, to achieve its goal of completing manpower requirements determinations for all positions and units.

**Response:** Concur. In September 2010, an independent contractor completed a manpower requirements analysis (MRA) that determined the resources the Coast Guard requires for its manpower requirements determination program. The Coast Guard Office of Human Resources Strategy and Capability will review this MRA, revalidate the inputs, and update the findings of the MRA to reflect current needs of the manpower requirements determination program. ECD: September 30, 2020.

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# Appendix VI: GAO Contact and Staff Acknowledgements

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## GAO Contacts

Nathan J. Anderson, (202) 512-3841, [AndersonN@gao.gov](mailto:AndersonN@gao.gov)

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## Staff Acknowledgements

In addition to the above contacts, Jason Berman (Assistant Director), Jennifer Kamara (Analyst-in Charge), Ben Atwater, Susan Czachor, Elizabeth Dretsch, Eric Hauswirth, Tracey King, Daniel Kuhn, and Kevin Reeves made key contributions to this report.

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