



July 15, 2022

The Honorable Alejandro Mayorkas
Secretary of Homeland Security
Washington, D.C. 20528

Priority Open Recommendations: Department of Homeland Security

Dear Secretary Mayorkas:

The purpose of this letter is to provide an update on the overall status of the Department of Homeland Security's (DHS) implementation of GAO's recommendations and to call your personal attention to areas where open recommendations should be given high priority.¹ In November 2021, we reported that on a government-wide basis, 76 percent of our recommendations made 4 years ago were implemented.² DHS's recommendation implementation rate was 83 percent. As of January 2022, DHS had 470 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our August 2021 letter, DHS has implemented 5 of our 40 open priority recommendations and we have closed one as not implemented.³

- U.S. Customs and Border Protection (CBP) implemented two recommendations to assess the contributions of surveillance technologies and border barriers to border security operations, and to apply this information when making investment and resource allocation decisions. Within CBP, U.S. Border Patrol developed a model that uses quantitative analysis and qualitative field insight to depict its Mission Essential Tasks

¹Priority recommendations are those that GAO believes warrant priority attention from heads of key departments or agencies. They are highlighted because, upon implementation, they may significantly improve government operation, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *Performance and Accountability Report: Fiscal Year 2021*, [GAO-22-4SP](#) (Washington, D.C.: Nov. 15, 2021).

³We closed one priority recommendation related to DHS's cost analysis process for prioritizing border barrier segments under the Impedance and Denial Prioritization Strategy. We recommended that CBP analyze the costs associated with future barrier segments and include cost as a factor in prioritizing locations for barrier construction projects under this strategy. In January 2021, a Presidential proclamation terminated the national emergency at the southwest border and paused border barrier construction, to the extent permitted by law, to permit completion and implementation of a plan for redirecting funding and repurposing contracts. In August 2021, CBP officials told us that given the Presidential proclamation, they were only completing certain previously approved border barrier projects. Due to these events, we closed this recommendation as not implemented. GAO, *Southwest Border Security: CBP Is Evaluating Designs and Locations for Border Barriers but Is Proceeding Without Key Information*, [GAO-18-614](#) (Washington, D.C.: Jul. 30, 2018).

across any area of operations.⁴ Moreover, to assist agents in executing these tasks, Border Patrol deploys various resources, including surveillance technologies and barriers. Border Patrol officials told us this model is helping them determine what resources would benefit operations.

- The Cybersecurity and Infrastructure Security Agency (CISA) established methods for monitoring the implementation of cybersecurity functions and communicating results to management, including the Deputy Director on an ongoing basis.⁵
- DHS developed a schedule and plan to complete a high value asset (HVA)⁶ program reassessment, identify needed resources, and finalize guidance for Tier 2 and Tier 3 HVAs (now referred to as non-Tier 1 HVA systems).⁷ These actions may reduce the challenges it faced in implementing the HVA assessment program, and, as a result, may reduce cybersecurity threats agencies face.
- The Countering Weapons of Mass Destruction office implemented our recommendation to develop a strategy and implementation plan to help the DHS coordinate its chemical defense programs and activities.⁸ These documents—the Chemical Defense Strategy and its implementation plan—are essential to helping guide DHS's efforts to address fragmentation and coordination issues.

DHS has 34 priority recommendations remaining from those we identified in the 2021 letter and a supplemental letter that followed on August 23, 2021.⁹ We ask for your continued attention to the remaining priority recommendations. We are adding 12 new recommendations. These recommendations are related to the National Flood Insurance Program, Federal Emergency Management Agency (FEMA) Public Assistance (PA) emergency work grants, DHS contracting, cybersecurity, the modernization of a biometric identity management system, and countering violent extremism bringing the total number of priority recommendations to 46. (See the enclosure for the list of recommendations and actions needed to implement them.)

⁴GAO, *Arizona Border Surveillance Technology Plan: Additional Actions Needed to Strengthen Management and Assess Effectiveness*, [GAO-14-368](#) (Washington, D.C.: Mar. 3, 2014) and GAO, *Southwest Border Security: Additional Actions Needed to Better Assess Fencing's Contributions to Operations and Provide Guidance for Identifying Capability Gaps*, [GAO-17-331](#) (Washington, D.C.: Feb. 16, 2017).

⁵GAO, *Cybersecurity: DHS's National Integration Center Generally Performs Required Function but Needs to Evaluate Its Activities More Completely*, [GAO-17-163](#) (Washington, D.C.: Feb. 1, 2017).

⁶A high value asset (HVA) is a designation for federal information or a federal information system that is considered vital to an agency fulfilling its primary mission, or is considered essential to an agency's security and resilience. Tier 1 HVA systems are systems of critical impact to both the agency and the nation and non-Tier 1 HVA systems are ones with a significant impact on both the agency and the nation or those with a high impact on the agency.

⁷GAO, *Information Technology: DHS Directives Have Strengthened Federal Cybersecurity, but Improvements Are Needed*, [GAO-20-133](#) (Washington, D.C.: Feb. 4, 2020).

⁸GAO, *Chemical Terrorism: A Strategy and Implementation Plan Would Help DHS Better Manage Fragmented Chemical Defense Programs and Activities*, [GAO-18-562](#) (Washington, D.C.: Aug. 22, 2018).

⁹GAO, *Additional Priority Open Recommendations: Department of Homeland Security*, [GAO-21-105374](#) (Washington, D.C.: August 23, 2021).

The 46 priority recommendations fall into the following eight major areas.

- 1. Emergency Preparedness and Response.** Disasters affect numerous American communities and cause billions of dollars of damage. FEMA plays a key role in preparing local communities for emergencies, rapidly responding during crises, and supporting recovery. FEMA should implement ten priority recommendations in this area. These include (1) developing and implementing a methodology that provides a more comprehensive assessment of a jurisdiction's capability to respond to and recover from a disaster without federal assistance and (2) identifying and implementing strategies to provide additional information to applicants about how FEMA determined their eligibility for assistance and the amount of assistance to award.

In implementing these and other recommendations, FEMA could improve the nation's flood resilience and the solvency of the National Flood Insurance Program; limit the federal government's fiscal exposure by better managing climate change risks; and more effectively manage response to emergencies, including assistance to individuals and households.

- 2. Border Security.** DHS is responsible for securing the nation's borders, while also facilitating lawful trade, travel, and immigration. In this role, DHS is charged with, among other things, ensuring the detection and interdiction of persons unlawfully entering the U.S., and protecting U.S. trade revenue. DHS should fully implement 11 priority recommendations in this area, including strengthening information sharing with the Department of Health and Human Services about unaccompanied children and noncitizen family members. In doing so, DHS can help support informed and timely decisions about their care. In addition, DHS could improve risk management in its collection and refund of duties, improve care for noncitizens in its short-term holding facilities at the southwest border, and enhance coordination of interagency efforts to support DHS's border security mission.
- 3. Transportation Security.** More than 2.7 million miles of pipeline transport and distribute oil, natural gas, and other hazardous products throughout the U.S. Interstate pipelines run through remote areas and highly populated urban areas, and are vulnerable to accidents, operating errors, and malicious physical and cyber-based attack or intrusion. The Transportation Security Administration (TSA) is primarily responsible for the oversight of pipeline physical security and cybersecurity. By implementing two priority recommendations in this area that will improve TSA's risk analysis, TSA will increase assurance that the agency accurately and comprehensively ranks relative risk among pipeline systems.
- 4. Infrastructure and Management.** DHS is the third-largest cabinet-level department in the federal government, overseeing tens of billions of dollars in annual budgetary resources, and employing more than 240,000 staff in a broad range of jobs, including countering terrorism and homeland security threats, providing aviation and border security, emergency response, cybersecurity, and critical infrastructure protection. DHS should fully implement nine priority recommendations in this area, including employing models for the U.S. Coast Guard's asset lines for predicting the outcome of investments, analyzing trade-offs, and optimizing decisions among competing investments; and using a balanced set of performance metrics to manage the department's procurement organizations. In implementing these and other recommendations, DHS could ensure its infrastructure, assets, workforce, and procurement organizations are effectively

managed to accomplish DHS's wide range of missions.

- 5. Information Technology and Cybersecurity.** DHS and its components invest billions of dollars each year to acquire IT and other capabilities to support the department's functions. Many of DHS's major IT acquisition programs have taken longer than expected to develop or failed to deliver the desired value.

Implementing GAO's eight priority recommendations in this area would help to inform DHS on the benefits of transitioning to Agile software development and help limit further schedule delays and cost overruns for modernizing its 28-year old biometric identity management system (i.e., fingerprint matching and facial recognition technology services).¹⁰ Moreover, they would increase DHS's awareness of the department's cyber risks in the context of other risks, and better position the department to complete organizational transformation efforts without additional delays. They would also help to improve its understanding of critical sectors' adoption of cybersecurity guidance in support of its cybersecurity and infrastructure protection missions.

- 6. Chemical Security.** Thousands of high-risk chemical facilities may be subject to the risk posed by cyber threat adversaries—terrorists, criminals, or nations. These adversaries could potentially manipulate facilities' information and control systems to release or steal hazardous chemicals and inflict mass casualties to surrounding populations. CISA, within DHS, evaluates high-risk chemical facilities' cybersecurity efforts via inspections that include reviewing policies and procedures, interviewing relevant officials, and verifying facilities' implementation of agreed-upon security measures. By implementing one priority recommendation in this area, improving human capital planning, CISA could ensure that it has the appropriate number of staff to carry out the program's cybersecurity-related efforts.
- 7. Countering Violent Extremism.** Violent extremism—generally defined as planning or committing violent acts to achieve political, ideological, religious, or social goals—has been perpetrated and promoted by a broad range of individuals and groups. Violent extremist attacks have resulted in over 200 deaths in the U.S. since 2010. By implementing the three priority recommendations, DHS can better develop and implement a more comprehensive approach to countering violent extremism domestically. For instance, DHS should revise or supplement its Countering Terrorism and Targeted Violence strategy to include key elements of a comprehensive strategy relating to the identification of (1) resources and investments and (2) key external factors that could affect goals. It should also take steps to close the gaps on those partially included in the strategy related to (a) problem definition, scope, and methodology; (b) activities, milestones, and performance measures; and (c) organizational roles, responsibilities, and coordination. DHS should also establish common terminology for targeted violence, and incorporate the governance of data needed to support its targeted violence and terrorism prevention mission into its departmental data governance framework.
- 8. Domestic Intelligence and Information Sharing.** There are two priority recommendations related to domestic intelligence and information sharing from our

¹⁰Agile software development is one form of incremental development that calls for the rapid delivery of software in small, short increments.

August 2021 report on DHS's special event designations related to the Capitol attack on January 6, 2021. Since our August 2021 letter, DHS has not taken any action on these recommendations. DHS officials stated that they do not concur with these recommendations and requested that GAO consider these recommendations resolved and closed. We have not closed these recommendations and maintain that it is important for DHS to implement them. Ensuring that the process for designating special security events is responsive to changing threats and understood by relevant agencies can help DHS coordinate enhanced security planning when needed.

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In March 2021, we issued our biennial update to our [High Risk List](#), which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.¹¹ One of our high-risk areas, [strengthening DHS management functions](#), centers directly on DHS. Another high-risk area is related to FEMA's management of the [National Flood Insurance Program](#).

Several other government-wide high-risk areas also have direct implications for DHS and its operations. These include (1) [improving the management of IT acquisitions and operations](#), (2) [improving strategic human capital management](#), (3) [managing federal real property](#), (4) [ensuring the cybersecurity of the nation](#),¹² and (5) [government-wide personnel security clearance process](#). We urge your attention to the government-wide high-risk issues as they relate to DHS. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within DHS. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹³

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees, including the Committees on Appropriations, Budget, Homeland Security and Governmental Affairs, and Judiciary, United States Senate; and the Committees on Appropriations, Budget, Homeland Security, Judiciary, and Oversight and Reform, House of Representatives.

In addition, the report will be available on the GAO website at <http://www.gao.gov>.

I appreciate DHS's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Charles Michael Johnson, Jr., Managing Director, Homeland Security and Justice Team at JohnsonCM@gao.gov or (202) 512-8777. Contact points for our offices of Congressional

¹¹GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: Mar. 2, 2021).

¹²With regard to cybersecurity, we also urge you to use foundational information and communications technology supply chain risk management practices set forth in our December 2020 report: GAO, *Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks*, [GAO-21-171](#) (Washington, D.C.: Dec. 15, 2020).

¹³GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 470 open recommendations, as well as those additional recommendations in the high-risk areas for which DHS has a leading role. Thank you for your attention to these matters.

Sincerely yours,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a long horizontal stroke extending to the right from the end of the name.

Gene L. Dodaro
Comptroller General of
the United States

Enclosure – 1

cc: John K. Tien, Deputy Secretary
Randolph D. "Tex" Alles, Under Secretary for Management (Acting)
Deanne Criswell, Administrator, Federal Emergency Management Agency (FEMA)
Nimisha Agarwal, Deputy Associate Administrator, Federal Insurance and Mitigation Administration, FEMA (Acting)
Chris Magnus, Commissioner, U.S. Customs and Border Protection
Ur Mendoza Jaddou, Director, U.S. Citizenship and Immigration Services
Raul L. Ortiz, Chief, United States Border Patrol
David Pekoske, Administrator, Transportation Security Administration
Admiral Linda L. Fagan, Commandant of the Coast Guard, U.S. Coast Guard
Roland Edwards, Chief Human Capital Officer, Office of the Chief Human Capital Officer
Jen Easterly, Director, Cybersecurity and Infrastructure Security Agency (CISA)
Eric Hysen, Senior Official Performing the Duties of the Deputy Under Secretary for Management
Bill Pratt, Director, Strategic Technology Management, Chief Technology Officer Directorate, OCIO
Mike Horton, Chief Data Officer
Shonnie Lyon, Director, Office of Biometric Identity Management
Paul Courtney, Chief Procurement Officer
Gary Rasicot, Acting Assistant Secretary, Countering Weapons of Mass Destruction Office
Dr. David Mussington, Executive Assistant Director for Infrastructure Security, CISA
Robert Silvers, Under Secretary, Office of Strategy, Policy, and Plans
Samantha Vinograd, Assistant Secretary for Counterterrorism and Threat Prevention (Acting)

The Honorable Shalanda Young, Director, Office of Management and Budget

Enclosure

Priority Open Recommendations to the Department of Homeland Security (DHS)

Emergency Preparedness and Response

Flood Insurance: Opportunities Exist to Improve Oversight of the WYO Program. [GAO-09-455](#). Washington, D.C.: August 21, 2009.

Recommendation: To provide transparency and accountability over the payments FEMA makes to Write Your Own (WYO) for expenses and profits, the Secretary of Homeland Security should direct the FEMA Administrator to annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates.

Action Needed: FEMA initially did not concur with this recommendation. To fully implement it, FEMA will need to develop and implement a process to annually analyze WYO expense and profit data and compare it to the rates it uses to compensate WYOs.

Subsequent to issuance of our report Congress passed the Biggert-Waters Flood Insurance Reform Act of 2012, which required that FEMA develop a methodology for determining the amount to pay insurers using actual expense data and issue a rule to formulate revised expense reimbursements to be structured to track insurers' actual flood-related expenses as practicably possible.¹⁴ FEMA's Expense Analysis Working Group drafted a procedures manual for determining WYO profit margins that FEMA officials estimate will be approved during fiscal year 2022. The manual will then be tested internally using WYO and insurance industry financial data from the National Association of Insurance Commissioners (NAIC). Finalizing these processes and annually comparing FEMA payments and WYO insurers' actual flood insurance expenses will provide greater transparency and accountability over the amount of estimated profit included in these payments.

High Risk Area: [National Flood Insurance Program](#)

Director: Alicia Puente Cackley, Financial Markets and Community Investment

Contact information: CackleyA@gao.gov, (202) 512-8678

Federal Disaster Assistance: Improved Criteria Needed to Assess a Jurisdiction's Capability to Respond and Recover on Its Own. [GAO-12-838](#). Washington, D.C.: September 12, 2012.

Recommendation: To increase the efficiency and effectiveness of the process for disaster declarations, the FEMA Administrator should develop and implement a methodology that provides a more comprehensive assessment of a jurisdiction's capability to respond to and recover from a disaster without federal assistance. This should include one or more measures of a jurisdiction's fiscal capacity, such as Total Taxable Resources, and consideration of the jurisdiction's response and recovery capabilities. If FEMA continues to use the Public Assistance per capita indicator to assist in identifying a jurisdiction's capabilities to respond to and recover from a disaster, it should adjust the indicator to accurately reflect the annual changes in the U.S. economy since 1986, when the current indicator was first adopted for use.

¹⁴Pub. L. No. 112-141, div. F, title II, § 100224(b)-(e), 126 Stat. 936, 937.

In addition, implementing the adjustment by raising the indicator in steps over several years would give jurisdictions more time to plan for and adjust to the change.

Action Needed: FEMA agreed with this recommendation. The Disaster Recovery Reform Act of 2018, signed into law October 5, 2018,¹⁵ directed FEMA to update the factors considered when evaluating a request for a major disaster declaration for public assistance, specifically the estimated cost of assistance (i.e., the per capita indicator).¹⁶ In December 2020, FEMA issued a proposed rule to increase the per capita indicator to account for increases in inflation from 1986 to 1999, and to adjust the individual states' indicators by their total taxable resources. FEMA also proposed to increase the minimum threshold by accounting for inflation from 1999 to 2019, and annually thereafter. FEMA announced a public comment period that began on March 12, 2021 and ended on April 12, 2021.

As of January 2022, FEMA is reviewing the comments and evaluating the appropriate next steps. Until FEMA implements a new methodology, it will not have an accurate assessment of a jurisdiction's capabilities to respond to and recover from a disaster without federal assistance and runs the risk of recommending that the President award Public Assistance to jurisdictions that have the capability to respond and recover without federal assistance.

High Risk Area: [Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks](#)

Director: Christopher P. Currie, Homeland Security and Justice
Contact information: CurrieC@gao.gov, (202) 512-8777

FEMA Disaster Workforce: Actions Needed to Address Deployment and Staff Development Challenges. [GAO-20-360](#). Washington, D.C.: May 4, 2020.

Recommendation: The FEMA Administrator should develop a plan—with time frames and milestones and input from field leadership—to address identified challenges that have hindered FEMA's ability to provide reliable and complete information to field leaders and managers about staff knowledge, skills, and abilities.

Action Needed: FEMA concurred with this recommendation. As of March 2022, according to FEMA officials, the agency has taken steps to enhance the FEMA Qualification System's coach-and-evaluator program, such as implementing assessments to ensure greater reliability for personnel who receive qualification status. In addition, FEMA officials stated that they conducted a listening session with field leadership to gather input on the FEMA Qualification System. Officials said that as a result of this session, they have developed qualification plans for cadres and standardized coach-and-evaluator selection and activity. While these are positive actions, our report identified a number of other interrelated challenges with the agency's qualification and deployment processes, such as position titles and qualification designations that do not fully reflect staff abilities, lack of information on specialized skills, and limitations with capturing full-time employee qualifications.

¹⁵Pub. L. No. 115-254, § 1239, 132 Stat. 3438, 3466.

¹⁶85 Fed. Reg. 80,719 (Dec. 20, 2020).

To fully implement this recommendation, it will be important for FEMA to take a comprehensive approach to address these challenges and develop a plan that considers solutions that may cut across multiple processes and systems. Such a plan would better enable the agency to use its disaster workforce as flexibly and effectively as possible to meet mission needs in the field.

Recommendation: The FEMA Administrator should develop mechanisms, including collecting relevant data, to assess how effectively FEMA's disaster workforce was deployed to meet mission needs in the field.

Action Needed: FEMA concurred with this recommendation. As of March 2022, FEMA officials stated that the agency is making progress toward meeting the force structure targets it established in 2019 and has a process in place to modify the targets on an annual basis if needed. In addition, officials stated that the Field Operations Directorate works closely with the National Preparedness Directorate, which engages with field leadership during and after disasters to solicit feedback and conduct analyses of field staffing challenges. However, these actions do not focus on the effectiveness of FEMA's deployment processes.

To fully implement this recommendation, FEMA will need to develop mechanisms to collect and analyze relevant data, such as the percentage of field staffing requests that were met or responses from surveys of field leadership, that focus specifically on the extent to which its deployment processes and decisions (e.g., number and timing of deployments) met field needs during disasters. Establishing these mechanisms would provide FEMA headquarters officials with critical information to assess whether its deployment strategies effectively placed staff with the right skills in the right place at the right time to meet mission needs and take corrective actions if necessary.

Director: Christopher P. Currie, Homeland Security and Justice
Contact information: CurrieC@gao.gov, (202) 512-8777

Disaster Assistance: Additional Actions Needed to Strengthen FEMA's Individuals and Households Program. [GAO-20-503](#). Washington, D.C.: September 30, 2020.

Recommendation: The FEMA Administrator should identify and implement strategies to provide additional information to applicants about how FEMA determined their eligibility for assistance and the amount of assistance to award.

Action Needed: FEMA agreed with this recommendation. As of April 2022, FEMA officials stated that FEMA is continuing to conduct its review of the letters and plans to implement any revisions by June 2022. To fully implement this recommendation, FEMA will need to ensure that the letters use plain language and include a description of how eligibility decisions are made. Taking these actions will improve FEMA's ability to provide information to its applicants about their eligibility for assistance.

Director: Christopher P. Currie, Homeland Security and Justice
Contact information: CurrieC@gao.gov, (202) 512-8777

Climate Change: Better Management of Exposures in Potential Future Losses is Needed for Federal Flood and Crop Insurance. [GAO-15-28](#). Washington, D.C.: October 29, 2014.

Recommendation: To promote forward-looking construction and rebuilding efforts while FEMA phases out most subsidies, the Secretary of the Department of Homeland Security should direct

FEMA to consider amending NFIP minimum standards for floodplain management to incorporate, as appropriate, forward-looking standards, similar to the minimum standard adopted by the Hurricane Sandy Rebuilding Task Force.

Action Needed: FEMA agreed with this recommendation. FEMA has taken some preliminary steps to consider amending NFIP minimum standards to incorporate forward-looking standards. Specifically, FEMA published a request for public input on revising the NFIP's minimum floodplain management standards in October 2021 and is in the process of reviewing the comments it received, according to a FEMA official.

Updating the minimum floodplain management standards to incorporate forward-looking minimum construction and land-use standards would meet the intent of this recommendation. However, as of February 2022, FEMA does not have a time frame for further action to revise the standards. Implementing this recommendation to improve the long-term resilience of insured structures may help decrease federal fiscal exposure to climate change.

High Risk Area: [Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks](#)

Director: J. Alfredo Gomez, Natural Resources and Environment

Contact information: gomezj@gao.gov, (202) 512-3841

COVID-19: Federal Efforts Could Be Strengthened by Timely and Concerted Actions.
[GAO-20-701](#). Washington, D.C.: September 21, 2020.

Recommendation: The Administrator of the Federal Emergency Management Agency—one of the agencies leading the COVID-19 response through the Unified Coordination Group—consistent with its roles and responsibilities, should work with relevant federal, state, territorial, and tribal stakeholders to devise interim solutions, such as systems and guidance and dissemination of best practices, to help states enhance their ability to track the status of supply requests and plan for supply needs for the remainder of the COVID-19 pandemic response.

Action Needed: In September 2020, DHS disagreed with this recommendation, noting, among other things, the work that FEMA had done to manage the medical supply chain and increase supply availability. We note that we made this recommendation to both DHS and HHS with the intent that they would work together under the Unified Coordination Group to address challenges reported by state officials with both public health and emergency management responsibilities. Moreover, we recommended they take actions that were consistent with the roles and responsibilities that were to be more clearly defined as HHS took a more central role in leading supply distribution.

Although FEMA disagreed with our recommendation, it began taking some action in March 2021 within its purview. For instance, FEMA developed and released an updated distribution management plan guide that, according to FEMA, provides actionable guidance for state, local, tribal, and territorial agencies, among others, to effectively and efficiently distribute critical resources to disaster survivors in the community. To fully implement this recommendation, FEMA and HHS must articulate how they worked with the other and coordinated their actions with respect to the public health and emergency management responsibilities. Without taking systematic and deliberate action to help states ensure they have the support they need to track and plan for supplies, states, tribes, and territories on the front lines of the whole-of-nation COVID-19 response may continue to face challenges that hamper their effectiveness.

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

National Flood Insurance Program: Congress Should Consider Updating the Mandatory Purchase Requirement. [GAO-21-578](#). Washington, D.C.: July 30, 2021.

Recommendation: The Deputy Associate Administrator of FEMA's Federal Insurance and Mitigation Administration should determine what information is available—both internally and externally—related to the mandatory purchase requirement, and use it to develop strategies for increasing consumer participation in the flood insurance market.

Action Needed: DHS agreed with this recommendation. As of January 2022, DHS outlined its plan to determine available information both internally and externally that could be used to develop strategies for increasing consumer participation in the flood insurance market. More specifically, DHS plans to continue its review of internal available data and external research conducted by agencies and researchers. Further, internally, DHS plans to look for ways to communicate with the FEMA Individual Assistance Program disaster relief recipients to determine if there are ways to increase consumer participation in the flood insurance market through information sharing across the NFIP mandatory purchase requirement and Individual Assistance Program. Both these efforts are expected to be completed by December 2022.

To fully implement this recommendation, DHS will need to follow through on its efforts to collect information, both internally and externally and develop strategies for increasing consumer participation. By doing so, FEMA may be able to better target its outreach to communities, lenders, property owners, and other stakeholders to improve compliance with the requirement.

Recommendation: The Deputy Associate Administrator of FEMA's Federal Insurance and Mitigation Administration should evaluate and report to Congress with recommendations on how comprehensive and up-to-date flood risk information could be used to determine which properties should be subject to the mandatory purchase requirement.

Action Needed: DHS agreed with the recommendation. As of January 2022, DHS outlined plans to assess data and make it available to policyholders and others regarding flood risk. DHS is determining the staff resources needed to perform an analysis and whether it will be conducted by contractors or in house staff, with an estimated completion timeframe of September 2022 (extended from the original March 2022 time frame). DHS also plans to report to Congress on its evaluation of flood risk data and recommend possible uses of flood risk information to inform mandatory purchase requirements by March 31, 2023.

To fully implement this recommendation, DHS will need to follow through on these efforts to evaluate how comprehensive and up-to-date flood risk information could be used to determine which properties should be subject to the mandatory purchase requirement. By conducting this analysis, FEMA could help Congress in its decision making on how, if at all, to revise the mandatory purchase requirement and improve the ability of the requirement to increase consumer participation and reduce future federal disaster assistance expenditures. Each of these goals will continue to be important as flood risk is expected to increase in the future.

High Risk Area: [National Flood Insurance Program](#)

Director: Alicia Puente Cackley, Financial Markets and Community Investment

Contact information: CackleyA@gao.gov, (202) 512-8678

Disaster Assistance: FEMA Should Take Additional Actions to Strengthen Fraud Risk Management for Public Assistance Emergency Work Grants. [GAO-20-604](#). Washington, D.C.: September 29, 2020.

Recommendation: The Administrator of FEMA should designate one entity as the lead entity with responsibility for providing oversight of agency-wide efforts to manage fraud risks to PA emergency work grants, including managing the fraud risk assessment process, consistent with leading practices.

Action Needed: DHS concurred with this recommendation. In its comments on our draft report, DHS noted that FEMA takes a multi-directorate approach to proactively address fraud risk within the PA program. Specifically, DHS noted that different FEMA entities have fraud-related responsibilities and that FEMA believes combining these functions into one office would potentially cause conflicts of interest. In December 2021, FEMA discussed with us the idea of designating a “remedies coordinator.” In March 2022, we reiterated the leading practices from the Fraud Risk Framework regarding the designation of an antifraud entity. At that time, we also noted that the proposed responsibilities of the remedies coordinator did not appear to include defined responsibilities for managing fraud risks as outlined in the leading practices.

To fully implement this recommendation, FEMA needs to designate one lead entity with responsibility for providing oversight of agency-wide efforts to manage fraud risks. Designating responsibility for providing oversight of fraud risk management efforts, including managing the fraud risk assessment process, can help ensure FEMA identifies and assesses fraud risks to PA emergency work grants. As a result, FEMA would be better positioned to develop reasonable, cost-effective measures to reduce fraud risks to acceptable levels.

Director: Rebecca Shea, Director, Forensic Audits and Investigative Service

Contact information: SheaR@gao.gov, (202) 512-6722

Border Security

Antidumping and Countervailing Duties: CBP Action Needed to Reduce Duty Processing Errors and Mitigate Nonpayment Risk. [GAO-16-542](#). Washington, D.C.: July 14, 2016.

Recommendation: To better manage the antidumping and countervailing (AD/CV) duty¹⁷ liquidation process, CBP should issue guidance directing the Antidumping and Countervailing Duty Centralization Team to (a) collect and analyze data on a regular basis to identify and address the causes of liquidations that occur contrary to the process or outside the 6-month time frame mandated by statute, (b) track progress on reducing such liquidations, and (c) report on any effects these liquidations may have on revenue.

Action Needed: DHS concurred with this recommendation. As of January 2022, CBP had taken some steps to implement the recommendation. CBP has issued guidance to collect and analyze data on untimely AD/CV liquidations and now regularly collects some data on untimely liquidations. CBP’s primary effort to reduce the number of untimely liquidations focuses on increasing uniformity in the liquidation process by (1) providing additional training, (2) updating its guidance to include detailed instructions, and (3) developing modules within CBP’s

¹⁷Antidumping duties are assessed on products exported to the United States at unfairly low prices (dumped) and countervailing duties are assessed on products that are subsidized by foreign governments.

information system to guide and manage the review and oversight of AD/CV duty entries. However, CBP does not report on the revenue effects of untimely AD/CV liquidations. According to agency officials, calculating such effects would be too labor intensive, requiring review of sometimes complex liquidation instructions over a number of years. However, we maintain that without such data, CBP cannot evaluate whether its effort to reduce untimely liquidations has had any effects on revenue.

Recommendation: To improve risk management in the collection of AD/CV duties, CBP should, consistent with U.S. law and international obligations, take steps to use its data and risk assessment strategically to mitigate AD/CV duty nonpayment, such as by using predictive risk analysis to identify entries that pose heightened risk and taking appropriate action to mitigate the risk.

Action Needed: DHS concurred with this recommendation. As of January 2022, CBP had issued guidance for determining when to use an STB for AD/CV entries. CBP had also issued guidance to revoke CBP officials' authority to allow importers that CBP had suspended or debarred to use a continuous entry bond, except when this bond is the only type acceptable. CBP is in the process of updating its monetary guidelines for setting bond amounts. Additionally, CBP officials said they were in the process of updating their electronic bond regulation to formally allow the use of such a bond and automating their bond sufficiency checks. According to CBP officials, the agency plans to complete initiatives to update bond guidelines and fully automate bond sufficiency checks by the end of fiscal year 2022. The initiatives CBP has taken and plans to take could help CBP mitigate the risk of AD/CV duty nonpayment but the extent to which the initiatives use its data and risk analysis strategically is unclear at this point.

Director: Kimberly M. Gianopoulos, International Affairs and Trade

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Unaccompanied Alien Children: Actions Needed to Ensure Children Receive Required Care in DHS Custody. [GAO-15-521](#). Washington, D.C.: July 14, 2015.

Recommendation: To increase the efficiency and improve the accuracy of the interagency unaccompanied alien children (UAC) referral and placement process, the Secretaries of Homeland Security and Health and Human Services should jointly develop and implement a documented interagency process with clearly defined roles and responsibilities, as well as procedures to disseminate placement decisions, for all agencies involved in the referral and placement of UAC in Department of Health and Human Services (HHS) shelters.

Action Needed: DHS concurred with our recommendation. In November 2020, DHS officials told us that, in coordination with HHS and other agencies, they are developing a Unified Immigration Portal. DHS officials told us that the portal is to provide real-time data to track unaccompanied children from the time of apprehension to their referral and placement in HHS-funded shelters. Further, HHS officials told us that HHS is developing a new data system to automate the referral process for unaccompanied children, which will be integrated with the portal. In March 2021, DHS components and HHS signed a memorandum of agreement regarding unaccompanied children information sharing that outlined the use of HHS's new data system, among other things. In mid-June 2022, DHS provided us with updated information about its efforts. We are following up with DHS and HHS to determine the extent to which they fully address the intent of our recommendation.

To fully address the recommendation, DHS and HHS should ensure that they have implemented procedures aimed at improving the efficiency and accuracy of the interagency unaccompanied children referral and placement process. Doing so would help prevent miscommunication between DHS and HHS in the referral process, and ensure HHS is making informed and timely placement decisions.

Director: Rebecca S. Gambler, Homeland Security and Justice
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Southwest Border: Actions Needed to Improve DHS Processing of Families and Coordination between DHS and HHS. [GAO-20-245](#). Washington, D.C.: February 19, 2020.

Recommendation: The Secretary of Homeland Security, jointly with the Secretary of Health and Human Services, should collaborate to address information sharing gaps identified in this report to ensure that the Office of Refugee Resettlement (ORR) receives information needed to make decisions for UAC, including those apprehended with an adult.

Action Needed: DHS concurred with this recommendation. As previously mentioned, DHS, in coordination with HHS, is developing a Unified Immigration Portal to provide real-time data to track unaccompanied children from the time of apprehension to their referral and placement in HHS-funded shelters, including those apprehended with an adult. Additionally, HHS's new data system aims to automate the process for referring unaccompanied children from DHS to HHS. In mid-June 2022, DHS provided us with updated information about its efforts. We are following up with DHS and HHS to determine the extent to which they fully address the intent of our recommendation.

To fully address the recommendation, DHS and HHS should collaborate to address information sharing gaps identified in our report to ensure that ORR receives information needed to make decisions for unaccompanied children, including those apprehended with an adult. Doing so would enable ORR to make more informed and timely decisions for unaccompanied children, including those separated from adults with whom they were apprehended.

Director: Rebecca S. Gambler, Homeland Security and Justice
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Southwest Border: Actions Needed to Address Fragmentation in DHS's Processes for Apprehended Family Members. [GAO-20-274](#). Washington, D.C.: February 19, 2020.

Recommendation: The Secretary of Homeland Security should identify the information about family members apprehended together that its components collectively need to process those family members and communicate that information to its components.

Action Needed: DHS concurred with this recommendation. According to DHS, in June 2020, DHS's Office of Immigration Statistics launched a Family Status Data Standards Community of Interest (COI), which includes subject matter experts from DHS components and HHS. In November 2021, DHS officials stated that the COI established what information gaps exist and possible solutions to close the gaps, which the Office of Immigration Statistics plans to summarize in a report. According to DHS officials, the Office of Immigration Statistics will then present possible solutions on information gaps and engage with senior leaders by September 30, 2022. Identifying and communicating department-wide information needs with respect to family members who have been apprehended together should help provide DHS with greater

assurance that its components are identifying all individuals who may be eligible for relief from removal from the U.S. based on their family relationships.

Recommendation: The Secretary of Homeland Security should evaluate options for developing a unique identifier shared across DHS components' data systems to link family members apprehended together.

Action Needed: DHS concurred with this recommendation. In commenting on our draft report, DHS reported that its Office of Immigration Statistics plans to work with relevant components to develop a unique shared identifier linking family members apprehended together. After first developing a standard code to describe family separation reasons, DHS reported that it will prioritize developing common codes to identify family members apprehended together. DHS expects to complete these actions by September 30, 2022. Evaluating options for developing a shared unique family member identifier across components that would allow each component access to certain information about family members apprehended together would help bridge the information gaps about family relationships between components caused by DHS's fragmented data systems.

Director: Rebecca S. Gambler, Homeland Security and Justice

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Southwest Border: CBP Needs to Increase Oversight of Funds, Medical Care, and Reporting of Deaths. [GAO-20-536](#). Washington, D.C.: July 14, 2020.

Recommendation: The Commissioner of CBP should develop and implement oversight mechanisms for CBP's implementation of policies and procedures relating to medical care for individuals in its custody to include documentation of expected practices, metrics and corresponding performance targets, and roles and responsibilities for taking corrective action.

Action Needed: CBP agreed with this recommendation. As of April 2022, officials stated that CBP is taking a variety of steps to develop oversight mechanisms for its medical care efforts, including developing medical quality management requirements for its medical support contract and developing a protocol for conducting management inspections of medical care at CBP facilities. These efforts, as described, represent important progress toward implementing our recommendation, which will help provide CBP assurance that its efforts to enhance medical care are being implemented as intended. Upon receipt of complete documentation, we will review CBP's oversight mechanisms to determine whether CBP has fully implemented our recommendation.

Director: Rebecca S. Gambler, Homeland Security and Justice

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Customs and Border Protection: Risk Management for Tariff Refunds Should Be Improved. [GAO-20-182](#). Washington, D.C.: December 17, 2019.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade assesses the feasibility of flagging excessive export submissions across multiple claims and takes cost-effective steps, based on the assessment, to prevent over claiming.

Action Needed: CBP concurred with this recommendation. According to CBP, as of February 2022, CBP has drafted a proposal for flagging excessive export submissions that it expects to complete by December 2022. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's proposal once finalized, to

determine whether CBP has implemented our recommendation. Because claimants could over claim drawback refunds for merchandise that was never exported, having the ability to flag excessive export submissions across multiple claims would enhance CBP's protection against over claiming.¹⁸

Recommendation: The Commissioner of CBP should ensure that the Office of Trade develops a plan, with time frames, to establish a reliable system of record for proof of export.

Action Needed: CBP concurred with this recommendation. According to CBP, the Automated Export System is insufficient as the sole system of record for electronic proof of export for drawback claims in its current state. As of February 2022, CBP continues to plan a path forward and expects to complete its plan by December 2022. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's plan once finalized, to determine whether CBP has implemented our recommendation. Until CBP implements effective control activities for the drawback program, the U.S. government may be subject to revenue loss through duplicate or excessive claims for drawback related to export information.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade turns the claim selection feature in the Automated Commercial Environment (ACE) back on and finalizes and implements procedures to target claims for review that were accepted into ACE during the period in which the selection feature was disabled.

Action Needed: CBP concurred with this recommendation. According to CBP, as of February 2022, it is working on additional programming required to enable the claim targeting feature in ACE, which it expects to complete by June 2022. In the interim, for drawback claims submitted when the ACE claim targeting feature was disabled, CBP said it has manually selected claims for a random review. We will continue to monitor the status of any efforts to enable the claim targeting feature in ACE and finalize and implement procedures to target claims for review that were accepted into ACE during the period in which the targeting feature was disabled. Without taking these steps, CBP may miss opportunities to protect U.S. trade revenue from improper payments of drawback claims.

Director: Kimberly M. Gianopoulos, International Affairs and Trade

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Southwest Border Security: Actions Are Needed to Address the Cost and Readiness Implications of Continued DOD Support to U.S. Customs and Border Protection. GAO-21-356. Washington, D.C.: February 23, 2021.

Recommendation: The Secretary of Homeland Security, together with the Secretary of Defense, should define a common outcome for DOD's support to DHS, consistent with best practices for interagency collaboration, and articulate how that support will enable DHS to achieve its southwest border security mission in fiscal year 2021 and beyond.

¹⁸Through the drawback program, CBP refunds up to 99 percent of duties, taxes, or fees previously paid by an importer. CBP makes these refunds on imported goods on which the importer previously paid duties, taxes, or fees, and subsequently exported from the U.S. or destroyed.

Action Needed: DHS concurred with this recommendation and stated that it will continue to use the request for assistance process to define and articulate a common outcome for DOD's support to DHS. However, as we stated in our report, this process has not enabled DOD and DHS to agree to a common outcome for DOD's support, because it focuses on meeting DHS's operational requirements over a short period of time. Additionally, DOD and DHS established an interagency planning team with the stated intention of enhancing coordination and to guide long-term operational planning; however, DHS disbanded this team in October 2019.

DOD and DHS's disagreement on the outcome for support in fiscal year 2021 and beyond is not consistent with the operational reality that DOD has actively supported DHS at the southern border in varying capacities since DHS's inception nearly two decades ago. DHS officials with whom we spoke in April 2021 indicated that they were working to address this recommendation. However, as of March 2022, DHS officials told us they have submitted three additional requests for assistance, two for operational support in fiscal years 2022 and 2023, and a third for aerostat equipment. Defining and articulating a common outcome for DOD's support could enable DHS to plan to manage its border security mission more effectively with its own assets.

Director: Elizabeth Field, Director, Defense Capabilities and Management

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Transportation Security

Critical Infrastructure Protection: Actions Needed to Address Significant Weaknesses in TSA's Pipeline Security Program Management. [GAO-19-48](#). Washington, D.C.: December 18, 2018.

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to identify or develop other data sources relevant to threat, vulnerability, and consequence consistent with the National Infrastructure Protection Plan and DHS critical infrastructure risk mitigation priorities and incorporate that data into the Pipeline Relative Risk Ranking Tool to assess relative risk of critical pipeline systems, which could include data on prior attacks, natural hazards, feedback data on pipeline system performance, physical pipeline condition, and cross-sector interdependencies.

Action Needed: DHS agreed with this recommendation. As of April 2022, TSA officials reported continuing to seek input from multiple sources of information that could be used to address this recommendation, including the Department of Transportation's Pipeline and Hazardous Materials Administration, the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, the Department of Energy and the Federal Energy Regulatory Commission, as well as the industry-led Oil and Natural Gas Sector Coordinating Council.

However, as of April 2022, TSA officials also reported that after examining the relative costs of integrating and maintaining non-security related data in the pipeline risk ranking tool, TSA sees little benefit to including these additional factors, if they are even determinable and distinguishable for specific pipeline systems, as they are not considered significant enough in comparison to other factors currently considered, such as throughput and service to critical infrastructure. TSA stated that there would be negligible change in the results of their risk calculations and therefore very limited improvement in the TSA risk assessment methodology for security purposes, for the costs that would likely be incurred. However, in our recommendation, we refer to security and non-security information as important for enhancing TSA's pipeline risk ranking tool.

To fully implement this recommendation, incorporating both types of information, such as data on prior attacks, cross-sector dependencies, and pipeline system performance, would provide TSA with increased assurance that the agency accurately and comprehensively ranks relative risk among pipeline systems. We believe our recommendation is still valid and will continue to monitor the status of TSA's activities to address this recommendation.

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to take steps to coordinate an independent, external peer review of its Pipeline Relative Risk Ranking Tool, after the Pipeline Security Branch completes enhancements to its risk assessment approach.

Action Needed: DHS agreed with this recommendation. As of April 2022, TSA officials reported that conducting an independent, external peer review of its Pipeline Relative Risk Ranking Tool is contingent upon completion of our recommended enhancements to the Tool. However, as of April 2022, TSA officials also reported that although they acknowledge there is some value in an independent review, the officials do not believe it is necessary or justified when weighed against competing funding and manpower requirements. To fully implement this recommendation, we agree that first implementing enhancements to TSA's risk assessment approach is necessary before launching a peer review. We also continue to view peer reviews as key to improving the technical quality and the credibility of risk assessments' underlying decision-making process.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Tina Won Sherman, Homeland Security and Justice
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Director: Marisol Cruz Cain, Information Technology and Cybersecurity
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Infrastructure and Management

Federal Real Property: DHS and GSA Need to Strengthen the Management of DHS Headquarters Consolidation. [GAO-14-648](#). Washington, D.C.: September 19, 2014.

Recommendations: The Secretary of Homeland Security and the Administrator of the General Services Administration (GSA) should work jointly to take the following two actions:

- conduct the following assessments and use the results to inform updated DHS headquarters consolidation plans:
 - a comprehensive needs assessment and gap analysis of current and needed capabilities that take into consideration changing conditions, and
 - an alternatives analysis that identifies the costs and benefits of leasing and construction alternatives for the remainder of the project and prioritizes options to account for funding instability;
- after revising the DHS headquarters consolidation plans, develop revised cost and schedule estimates for the remaining portions of the consolidation project that conform to GSA guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.

Action Needed: DHS and GSA agreed with the two recommendations. The Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 required DHS to submit information to congressional committees regarding the current plan. The Act required that DHS, in coordination with GSA, provide information that was consistent with what we recommended, including a comprehensive needs assessment, a costs and benefits analysis, and updated cost and schedule estimates.¹⁹ In March 2022, DHS—with input from GSA—submitted its report to congressional committees in response to the Act. We are assessing the extent to which the report addresses our recommendations and could thereby enable sound decision-making related to DHS’s ongoing headquarters consolidation.

High Risk Area: [Managing Federal Real Property](#)

Director: Christopher P. Currie, Homeland Security and Justice
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Director (Acting): Catina Bradley Latham, Physical Infrastructure
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Coast Guard: Actions Needed to Close Stations Identified as Overlapping and Unnecessarily Duplicative. [GAO-18-9](#). Washington, D.C.: October 26, 2017.

Recommendation: The Commandant of the Coast Guard should establish a plan with target dates and milestones for closing boat stations that it has determined, through its 9-step process and subsequent analysis, provide overlapping search and rescue coverage and are unnecessarily duplicative.

Action Needed: DHS agreed with this recommendation and stated that it continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. DHS, through the Coast Guard, stated that it would complete additional analyses of its stations in early 2018, with changes to operations expected to begin in the fall of 2018.

As of March 2022, the Coast Guard has consolidated four of 18 stations it previously identified as redundant. This consolidation involved closing smaller facilities and moving personnel and assets to nearby larger stations that the Coast Guard determined could provide for the same level of response coverage. The Coast Guard anticipates that divestiture of the closed facilities will take years. However, the Coast Guard removed one station from consideration for consolidation, reporting that public and Congressional members objected to its closure, even though it had identified the station as unnecessarily duplicative. The Coast Guard plans to continue to evaluate the potential for closing additional unnecessarily duplicative stations as part of an iterative boat optimization process, but has not documented a plan with target dates and milestones for closing such stations.

According to the Coast Guard, stations identified as redundant may be included in future budget submissions for closure. For example, the Coast Guard’s fiscal year 2022 congressional budget justification proposed consolidation of redundant stations that it believes will achieve about \$1 million in cost savings for the year through such efficiencies. To fully implement this recommendation, the Coast Guard should establish a plan with target dates for closing boat stations that it determined provide overlapping search and rescue coverage and are unnecessarily duplicative.

¹⁹Pub. L. No. 114-150, 130 Stat. 366 (2016).

Recommendation: The Commandant of the Coast Guard should take action to close the stations identified according to its plan and target dates.

Action Needed: DHS agreed with this recommendation and stated that once analyses and plans and target dates were complete, it would solicit and incorporate feedback and begin implementing changes in the fall of 2018. As of March 2022, the Coast Guard reported that it had consolidated four stations with larger adjacent stations. However, the Coast Guard continues to evaluate redundant stations for closure as part of its boat optimization process, and stations identified as redundant may be recommended for closure in future budget submissions. To fully implement this recommendation, DHS, through the Coast Guard, should close boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

Director (Acting): Heather MacLeod, Homeland Security and Justice

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Coast Guard Shore Infrastructure: Applying Leading Practices Could Help Better Manage Project Backlogs of at Least \$2.6 Billion. [GAO-19-82](#). Washington, D.C.: February 21, 2019.

Recommendation: The Commandant of the Coast Guard should employ models for its asset lines for predicting the outcome of investments, analyzing trade-offs, and optimizing decisions among competing investments.

Action Needed: The Coast Guard agreed with our recommendation, but, as of January 2022, had not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternatives to identify a preferred solution to recommend for implementation, and estimated that it will complete this analysis and fully implement a modeling solution by the end of September 2023. To fully implement this recommendation, the Coast Guard needs to employ its modeling solution for predicting the outcome of investments, analyzing trade-offs, and optimizing decisions among competing investments.

Director (Acting): Heather MacLeod, Homeland Security and Justice

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Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs. [GAO-20-223](#). Washington, D.C.: February 26, 2020.

Recommendation: 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.

Action Needed: DHS concurred with this recommendation. In February 2020, we reported that the Coast Guard had assessed a small portion of its workforce needs and recommended it 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. 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. In February 2022, the Coast Guard estimated completing the effort by July 31, 2022. By fully implementing this recommendation the Coast Guard will be able to allocate personnel in the most effective and efficient manner.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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Coast Guard: Actions Needed to Improve National Vessel Documentation Center Operations. [GAO-21-100](#). Washington, D.C.: December 16, 2020.

Recommendation: The Commandant of the Coast Guard should direct the Assistant Commandant for Prevention Policy to ensure that the National Vessel Documentation Center (NVDC) conducts a full cost study of NVDC's commercial and recreational user fees.

Action Needed: In concurring with our recommendation, the Coast Guard stated that the NVDC will conduct a full cost study of its commercial and recreational user fees, with oversight provided as needed by the Director of Operations Resource Management for the Deputy Commandant for Operations. DHS stated that the NVDC would do so after the Coast Guard develops a new information technology system to accurately assess the actual costs of providing services to the public, including new information technology support costs. DHS estimated that it would obtain delivery of the new information technology system by March 31, 2022, and conduct the full cost study by December 31, 2022.

In December 2021, Coast Guard officials told us they adjusted the delivery date for the new information technology system from March 31, 2022 to August 31, 2022. As a result, they adjusted the estimated completion date for conducting the full cost study from December 31, 2022 to June 30, 2023. In February 2022, Coast Guard officials told us they remain on track to meet the estimated completion date. By fully implementing this recommendation, the Coast Guard will have more assurance that its fees accurately charge users for the costs of providing its services.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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DHS Employee Morale: Some Improvements Made, but Additional Actions Needed to Strengthen Employee Engagement. [GAO-21-204](#). Washington, D.C.: January 12, 2021.

Recommendation: The DHS Office of the Chief Human Capital Officer (OCHCO) should monitor components' implementation of the OPM action planning cycle to ensure the components review and assess the results of their actions to adjust, reprioritize, and identify new actions needed to improve employee engagement.

Action Needed: DHS agreed with the recommendation. In March 2021, OCHCO issued written guidance for the DHS component employee engagement action planning process that includes mechanisms for OCHCO to monitor components' implementation of the OPM action planning cycle.

To fully implement this recommendation, OCHCO will need to continue implementing this monitoring framework and demonstrate that, as a result, components consistently review and assess the results of their employee engagement action planning efforts and use these assessments to adjust, reprioritize, and identify new actions to improve employee engagement.

High Risk Area: [Strengthening the Department of Homeland Security Management Functions](#)

Director: Christopher P. Currie, Homeland Security and Justice
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Federal Contracting: Senior Leaders Should Use Leading Companies' Key Practices to Improve Performance. [GAO-21-491](#). Washington, D.C.: July 27, 2021.

Recommendation: The Secretary of Homeland Security should ensure the DHS Chief Procurement Officer uses a balanced set of performance metrics to manage the department's procurement organizations, including outcome-oriented metrics to measure (a) cost savings/avoidance, (b) timeliness of deliveries, (c) quality of deliverables, and (d) end-user satisfaction.

Action Needed: DHS did not concur with the recommendation, stating that while the department supports the use of outcome-oriented metrics, it disagreed that the specific metrics included in our recommendation necessarily captured the most relevant aspects of procurement organizations' performance. However, DHS also stated the CPO office would review its current metrics to determine whether they appropriately measure outcomes. We agree DHS could identify additional outcome oriented metrics that are tailored to its needs. We also continue to believe DHS should address the recommendation by using the four types of metrics we identified because the corporate procurement leaders we interviewed emphasized the importance of using these four types of outcome-oriented metrics.²⁰

In January 2022, DHS said it was reviewing current processes and process-oriented metrics to determine what outcome-oriented metrics it could develop based on those processes. The department estimated it would complete this effort by November 2022. This effort has the potential to help DHS address the recommendation if it leads to DHS using the four types of metrics we identified. Using these types of metrics would help DHS identify improvement opportunities, set priorities, and allocate resources.

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Information Technology and Cybersecurity

Critical Infrastructure Protection: Additional Actions Are Essential for Assessing Cybersecurity Framework Adoption. [GAO-18-211](#). Washington, D.C.: February 15, 2018.

Recommendation: The Secretary of Homeland Security, in cooperation with the co-sector-specific agencies as necessary, should take steps to consult with respective sector partner(s), such as the sector coordinating councils, and National Institute of Standards and Technology, as appropriate, to develop methods for determining the level and type of framework adoption by entities across their respective sectors.

Action Needed: DHS concurred with the recommendation in our report and stated that the department will continue to work closely with its private sector partners to ensure framework adoption is a priority. Additionally, the agency stated that it would try to better understand the extent of, and barriers to, framework adoption by entities across their respective sectors. As of February 2022, the department took initial steps to develop methods to determine the level and type of framework adoption in one of its respective sectors. Specifically, from October through December 2019, DHS officials, in coordination with its IT sector partner, administered a survey

²⁰The four types of outcome-oriented metrics measure (a) cost savings/avoidance, (b) timeliness of deliveries, (c) quality of deliverables, and (d) end-user satisfaction.

to approximately 100 small and mid-sized businesses (with 50 percent representing IT sector organizations) to gather information on, among other things, their level of framework adoption and use in conjunction with other cybersecurity standards. However, the survey does not measure the level and type of framework adoption by entities across DHS's other critical infrastructure sectors.

As of September 2021, the department did not have plans for conducting additional surveys to determine framework adoption among its sectors.

While DHS has taken important initial steps for measuring framework adoption and use for a portion of the IT sector and has developed sector-specific framework implementation guidance for other sectors, implementing our recommendations to gain a more comprehensive understanding of the framework's use by all of its critical infrastructure sectors is essential to the success of protection efforts.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director (Acting): David Hinchman, Information Technology and Cybersecurity

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Cybersecurity: Agencies Need to Fully Establish Risk Management Programs and Address Challenges. [GAO-19-384](#). Washington, D.C.: July 25, 2019.

Recommendation: The Secretary of Homeland Security should establish and document a process for coordination between cybersecurity risk management and enterprise risk management functions.

Action Needed: DHS concurred with our recommendation. In February 2022, DHS officials told us they were still in the process of fully defining their enterprise risk management governance structure. They added that they were undertaking this effort in coordination with the department's Chief Information Officer and Chief Information Security Officer. However, DHS did not provide an expected completion date for these efforts. To fully implement this recommendation, DHS needs to establish and document its process for coordination between these two functions. By doing so, DHS will be better positioned to address significant cybersecurity risks in the context of other risks and their potential impacts on the mission of the agency.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Marisol Cruz Cain, Information Technology and Cybersecurity

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Agile Software Development: DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to take Additional Actions. [GAO-20-213](#). Washington, D.C.: June 1, 2020.

Recommendation: The Secretary should ensure that the IT Program Management Center of Excellence (ITPM COE), in coordination with the CIO, begins measuring results associated with the transition to Agile and the success of the transition based on its impact on the department.

Action Needed: DHS concurred with our recommendation. In February 2022, DHS stated that the Office of the Chief Information Officer collected some Agile core metrics in 2021. However,

DHS reported that the office does not yet have sufficient data to demonstrate that it has addressed this recommendation due to a small sample size. DHS officials anticipated completing the actions necessary to fully address this recommendation by September 30, 2022. By measuring and communicating the results of the transition to Agile development, DHS can be better positioned to determine whether the department is achieving its desired results with its transition. To fully implement this recommendation, DHS needs to demonstrate that it is measuring the results associated with its transition to Agile and the success of the transition.

High Risk Area: [Improving the Management of IT Acquisitions and Operations](#)

Director: Carol Harris, Information Technology and Cybersecurity

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Cybersecurity and Infrastructure Security Agency: Actions Needed to Ensure Organizational Changes Result in More Effective Cybersecurity for Our Nation. [GAO-21-236](#). Washington, D.C.: March 10, 2021.

Recommendation: The Director of CISA should establish expected completion dates for those phase three tasks that are past their completion dates, with priority given to those tasks critical to mission effectiveness.

Action Needed: CISA concurred with this recommendation, and in March 2021, agency leadership issued a memorandum that directed several actions to transition transformation activities into operational tasks for implementation by CISA's divisions and mission support offices. However, as of March 2022, CISA had not yet provided documentation detailing how the remaining phase three tasks have been allocated to its divisions and mission support offices or how CISA leadership monitors the status of these tasks to ensure timely completion. Establishing target completion dates for the remaining tasks and prioritizing mission-critical tasks would better position the agency to achieve the goals of its transformation initiative and effectively carry out its mission. We will be able to determine if this recommendation has been fully addressed once we receive this supporting documentation.

Recommendation: The Director of CISA should establish an overall deadline for the completion of the transformation initiative.

Action Needed: CISA concurred with this recommendation, and in March 2021, agency leadership issued a memorandum that directed several actions to transition transformation activities into operational tasks for implementation by CISA's divisions and mission support offices. According to CISA, this constituted the end of phase three of its transformation effort. However, as of March 2022, CISA did not provide documentation which detailed how the remaining phase three tasks have been allocated to its divisions and mission support offices, or estimated time frames for completing these remaining tasks. Detailing these remaining tasks and their expected completion dates would better position the agency to achieve the goals of its transformation initiative and effectively carry out its mission. We will be able to determine if this recommendation has been fully addressed once we receive this supporting documentation.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Marisol Cruz Cain, Director, Information Technology and Cybersecurity

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Director: Tina Won Sherman, Homeland Security and Justice
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Homeland Security: DHS Needs to Fully Implement Key Practices in Acquiring Biometric Identity Management System. [GAO-21-386](#). Washington, D.C.: June 8, 2021.

Recommendation: The Secretary of DHS should direct the Chief Information Officer to update existing policy to reflect the processes that should be used to address each of the TechStat requirements.

Action Needed: DHS agreed with this recommendation and has taken steps to address it. Specifically, the department developed a TechStat process guide in January 2022 that reflects processes that should be used to address four of the five Office of Management and Budget (OMB) TechStat requirements.²¹ However, the process guide was unclear on the extent to which it fully addresses OMB's fifth requirement. As such, in March 2022, we requested additional documentation to support whether the fifth OMB requirement has been fully addressed in the new process guide. We will be able to determine if this recommendation has been fully addressed once we receive this supporting documentation. Until DHS updates its policy to be consistent with the practices the department actually uses to meet TechStat requirements, other DHS IT programs deemed high risk will likely not be readily aware of the specific process requirements.

Recommendation: The Secretary of DHS should direct the Office of Biometric Identity Management (OBIM) Director to ensure that, moving forward, the Homeland Advanced Recognition Technology (HART) program tracks and monitors all of its costs, including government labor costs.

Action Needed: DHS agreed with this recommendation. In February 2022, we requested documentation that demonstrates that DHS is tracking and monitoring all HART program costs on an ongoing basis. As of June 2022, we had not received documentation that fully addresses this recommendation. We will be able to determine if this recommendation has been fully addressed once we receive this supporting documentation. Without accurately tracking and monitoring all costs, the program risks experiencing further schedule delays and cost overruns.

Recommendation: The Secretary of DHS should direct the OBIM Director to ensure that the HART program establishes and maintains a process to ensure bidirectional traceability of its requirements in future development.

Action Needed: DHS agreed with this recommendation. In December 2021, the department stated that OBIM continues to work with system development teams to ensure lower-level system requirements are appropriately traced to HART's high-level requirements and that all high-level requirements are traced to lower-level system requirements. DHS also stated that it maintains bidirectional traceability reports. In May 2022, DHS officials provided documentation that is intended to demonstrate their requirements traceability approach. In June 2022, we informed DHS that we would review the documentation to determine if it demonstrates that HART has established a process that ensures bidirectional traceability for future development.

²¹The five OMB requirements for a TechStat review are: (1) establish a root cause analysis of performance issues, (2) establish corrective action plans which address the root causes, (3) establish a timeline for implementing the corrective action plans, (4) document an assessment using OMB's "Investment and Portfolio Management Maturity Framework" template, and (5) provide results of the TechStat review to OMB.

DHS will also need to provide documentation that demonstrates that HART is maintaining the revised process on an ongoing basis. We will be able to determine if this recommendation has been fully addressed once we receive this supporting documentation. Until the program fully implements best practices for maintaining bidirectional traceability of requirements, the program risks developing a system that may not meet its partner agencies' needs.

High Risk Area: [Improving the Management of IT Acquisitions and Operations](#)

Director: Kevin Walsh, Information Technology and Cybersecurity

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Chemical Security

Critical Infrastructure Protection: Actions Needed to Enhance DHS Oversight of Cybersecurity at High-Risk Chemical Facilities. [GAO-20-453](#). Washington, D.C.: May 14, 2020.

Recommendation: The Assistant Director of the Infrastructure Security Division should develop a workforce plan that addresses the program's cybersecurity-related needs, which should include an analysis of any gaps in the program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them.

Action Needed: DHS concurred with this recommendation and took several steps to address it. According to CISA officials, as of April 2022, they issued new guidance to assist with chemical security workforce planning and estimate that they will implement the requirements of the workforce plan by August 2023. Fully addressing this recommendation by developing a workforce plan that includes analysis of any gaps in the chemical security program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them, will help the program ensure that it has the appropriate number of staff to carry out cybersecurity-related efforts.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

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Countering Violent Extremism

Countering Violent Extremism: DHS Can Further Enhance Its Strategic Planning and Data Governance Efforts. [GAO-21-507](#). Washington, D.C.: July 20, 2021.

Recommendation: The Secretary of Homeland Security should ensure that the Office of Counterterrorism and Threat Prevention Policy and affected components and offices revise or supplement DHS's Countering Terrorism and Targeted Violence strategy to include all key elements of a comprehensive strategy.

Action Needed: DHS concurred with the recommendation. As of February 2022, DHS stated that it was consolidating action items from its posture review with similar items contained in the White House implementation plan, and plans to complete this process by September 2022. At that time, we will request an update on the extent, if at all, these ongoing efforts consider

incorporating key elements of a comprehensive strategy. By incorporating elements of a comprehensive strategy in its efforts, DHS will be in a better position to determine and address the department's long term needs for countering violent extremism.

Recommendation: The Secretary of Homeland Security should ensure that the Chief Data Officer—in consultation with other affected offices and components—incorporates the governance of data needed to support DHS's targeted violence and terrorism prevention mission into its departmental data governance framework, including determining how targeted violence and terrorism prevention will be represented on the data governance body, conducting a data maturity assessment, and identifying opportunities to increase staff data skills that includes targeted violence and terrorism prevention data.

Action Needed: DHS concurred with the recommendation. Since then, DHS identified two domains that govern targeted violence and terrorism prevention data, specifically the intelligence and law enforcement data domains. Further, DHS identified specific targeted violence and terrorism objectives, including, among others, increasing the speed of incident identification and notification of designated entities, adding mobile data sharing applications, and accommodating a wider audience when sharing intelligence data information.

To fully implement this recommendation, DHS must implement a data maturity assessment that covers its targeted violence and terrorism prevention-related data domains, which it plans to complete by the end of June 2022. Further, DHS must identify and catalog opportunities to increase staff skills for its targeted violence and terrorism prevention-related data domains, which it estimates will be completed by September 30, 2022. By taking these actions, DHS will be in a better position to have data drive its targeted violence and terrorism prevention mission.

Recommendation: The Secretary of Homeland Security—in consultation with affected offices and components—should establish common terminology for targeted violence.

Action Needed: DHS concurred with recommendation. DHS stated that it plans to add targeted violence to its approved DHS Lexicon by August 31, 2022, which will fully implement this recommendation. By adding targeted violence to its lexicon, DHS will be able to better coordinate its efforts to address targeted violence among DHS's affected components, and communicate its programs and efforts with outside stakeholders.

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Domestic Intelligence and Information Sharing: Improving Program Oversight and Controls

Capitol Attack: Special Event Designations Could Have Been Requested for January 6, 2021, but Not All DHS Guidance is Clear. [GAO-21-105255](#). Washington, D.C.: August 9, 2021.

Recommendation: The Secretary of Homeland Security should consider whether additional factors, such as the context of the events and surrounding circumstances in light of the current environment of emerging threats, are needed for designating NSSE events.

Action Needed: As of March 16, 2022, DHS officials stated that they do not concur with this recommendation and requested that GAO consider this recommendation resolved and closed.

We disagree and maintain that implementing this recommendation is important. While past congressional certifications of election results were not designated NSSEs, and DHS officials considered this normal congressional business, the lack of consideration of other factors, such as the large rally at the Ellipse that mobilized to the Capitol, and the climate surrounding the 2020 election demonstrate a gap in the adaptability of how these events are considered.

To fully implement this recommendation, DHS needs to formally review the factors it developed to designate a National Special Security Event (NSSE), including whether additional events should be designated as an NSSE. A review of these factors can help ensure that the process for designating an NSSE is dynamic and responsive to changing environments and emerging threats.

Recommendation: The Secretary of Homeland Security should update the Department of Homeland Security's policy to clarify and communicate the process for requesting an NSSE designation for an event held on federal property in Washington, D.C. to all relevant stakeholders, including relevant federal, state, and local entities.

Action Needed: As of March 16, 2022, DHS officials stated that they do not concur with this recommendation and requested that GAO consider this recommendation resolved and closed. We disagree and maintain that implementing this recommendation is important. As noted in our report, there is a gap in DHS's policy and in the awareness of relevant partners regarding the process. Clarifying and communicating the DHS policy for requesting an NSSE designation for events on federal property in Washington, D.C. will help ensure that responsible entities are aware of their ability to make such a request.

To fully implement this recommendation, DHS needs to clarify its policy to clearly identify who can request an NSSE designation on federal property in Washington, D.C. Updating its policy will help DHS ensure that relevant agencies are aware of, and understand, the process for requesting such event designations and may help to better secure the Capitol Complex and other federal properties in the future.

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