

**441 G St. N.W.  
Washington, DC 20548**

January 27, 2026

The Honorable Rand Paul, M.D.  
Chairman  
The Honorable Gary C. Peters  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

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

**U.S. Immigration and Customs Enforcement: Actions Still Needed to Improve Planning and Management of Its Native American Law Enforcement Unit**

Over 150 miles of the United States southwest and northern borders are within American Indian reservations. As with other border areas, these areas may be vulnerable to illicit cross-border activity. Congress established the Shadow Wolves program, which began operations in 1974, to address the illegal smuggling of controlled substances from Mexico to the Tohono O'odham Nation reservation in Arizona and into the interior of the United States.<sup>1</sup> The program's employees—known as "Shadow Wolves"—must be certified to have at least one-quarter American Indian ancestry from a federally recognized Tribe.<sup>2</sup> Within the Department of Homeland Security (DHS), they are a unit as part of the U.S. Immigration and Customs Enforcement's (ICE) Homeland Security Investigations (HSI) office in Sells, Arizona—the capital of the Tohono O'odham Nation.

The Tohono O'odham Nation has faced challenges due to an increase in migrant and transnational criminal organization activity on the reservation in recent years, according to

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<sup>1</sup>According to ICE, an act of Congress created the Shadow Wolves program in 1972, and on April 14, 1974, the U.S. Customs Service swore in the first seven Shadow Wolves. About 62 miles of the U.S. southwest border is located on the Tohono O'odham Nation reservation.

<sup>2</sup>Excepted Service; Consolidated Listing of Schedules A, B, and C Exceptions, 89 Fed. Reg. 61177, 61180 (July 30, 2024) (Sch. A, 213.3111(e)); Excepted Service, 89 Fed. Reg. 45688 (May 23, 2024) (Sch. A, 213.3111(g)(2)). Dating back to 1974, the program's hiring authority has required that the program hire persons with one-fourth or more "Indian blood." For the purposes of this report, we refer to this language as requiring persons of American Indian ancestry.

Tohono O'odham Nation officials. As a result, the officials stated that in recent years the Tohono O'odham Police Department has spent about 50 percent of its time on border-related issues. The officials also cited negative effects of transnational criminal organizations on the reservation, including smugglers holding families hostage, damaging or stealing property, and recruiting tribal youth to engage in smuggling activity. HSI officials also stated that they have seen a recent increase in smuggling through the Tohono O'odham Nation.

The Shadow Wolves Enhancement Act, which became law in April 2022, required DHS to submit a strategy for the Shadow Wolves program to the Committee on Homeland Security and Governmental Affairs of the Senate, Committee on Homeland Security of the House of Representatives, and GAO no later than 90 days after enactment. Specifically, the act required a strategy for retaining existing Shadow Wolves, recruiting new Shadow Wolves, and expanding comparable units to appropriate areas near the northern or southwest borders with the approval and consent of the appropriate Tribe.<sup>3</sup> DHS submitted its Shadow Wolves Enhancement Act strategy in October 2022. The act also authorized ICE to reclassify Shadow Wolves from the GS-1801 tactical officer position to GS-1811 special agent.<sup>4</sup>

The act includes a provision for us to assess the effectiveness of DHS's strategy and provide recommendations for improving the strategy.<sup>5</sup> After an initial report due not later than 1 year after receiving DHS's strategy, we are required to report annually for the following 2 years. We issued our first report related to this provision in January 2024.<sup>6</sup> That report included six recommendations to ICE for improving planning for the Shadow Wolves program, which we discuss later in this report. We issued our second report in November 2024, which provided updates on the status of our six recommendations.<sup>7</sup> This third report updates information since November 2024 and assesses ICE's (1) efforts to define the mission of the Shadow Wolves program and conduct workforce planning to understand the skills and positions necessary to meet mission needs; (2) strategies for recruiting and retaining Shadow Wolves; and (3) planning efforts to expand the Shadow Wolves program to comparable units in other tribal lands.

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<sup>3</sup>Pub. L. No. 117-113, § 3, 136 Stat. 1173, 1173-74 (2022). As of December 2025, there are 575 federally recognized Tribal Nations (variously called Tribes, nations, bands, pueblos, communities, and Native villages) in the United States. Indian Entities Recognized by and Eligible To Receive Services From the United States Bureau of Indian Affairs, 89 Fed. Reg. 99899 (Dec. 11, 2024) (providing for 574 federally recognized Tribes); see National Defense Authorization Act for Fiscal Year 2026, Pub. L. No. 119-60, § 8803, 139 Stat. 718 (2025) (amending the Act of June 7, 1956, to provide federal recognition to the Lumbee Tribe of North Carolina, bringing the total number of federally recognized Tribes to 575, as of December 2025). Over 200 of these ethnically, culturally, and linguistically diverse nations are located in Alaska; the other federally recognized Tribes are located in 35 other states.

<sup>4</sup>Position classification is a process through which federal positions are assigned to a pay system, series, title, and grade or band, based on consistent application of position classification standards. A job series consists of a group of positions in a similarly specialized line of work and with similar qualification requirements. Series are designated by a title and number. For example, the Criminal Investigation Series has a series number of GS-1811, and the General Inspection, Investigation, Enforcement, and Compliance Series has a series number of GS-1801. Position titles are the official names of the positions within a job series, such as GS-1801 Tactical Officers or GS-1811 Special Agents. Reclassification occurs when an agency changes the title, series, grade, or pay system of a position based on the application of published position classification standards or guides.

<sup>5</sup>Pub. L. No. 117-113, § 4, 136 Stat. at 1174.

<sup>6</sup>GAO, *U.S. Immigration and Customs Enforcement: Improvements Needed to Workforce and Expansion Plans for Unit of Native American Law Enforcement Personnel*, [GAO-24-106385](#) (Washington, D.C.: Jan. 30, 2024).

<sup>7</sup>GAO, *U.S. Immigration and Customs Enforcement: Update on Planning for Unit of Native American Law Enforcement Personnel*, [GAO-25-107644](#) (Washington, D.C.: Nov. 18, 2024).

To address all three objectives, we conducted interviews with ICE and HSI headquarters officials, HSI field officials, and each member of the Shadow Wolves unit regarding program operations, mission, recruitment plans, and expansion planning efforts.

We conducted this performance audit from June 2025 to January 2026 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.

### **ICE Has Not Established Program Goals Related to the Shadow Wolves Mission or Obtained Input from the Tohono O'odham Nation**

In January 2024, we reported that the Shadow Wolves program's mission had shifted from interdiction of drug and human smugglers by using technology and traditional Indigenous tracking methods to a focus on conducting investigations.<sup>8</sup> We found that ICE had not defined the mission or goals of the program since the change in focus.<sup>9</sup>

We also reported in January 2024 that ICE officials and Shadow Wolves members expressed varying perspectives on the mission of the Shadow Wolves program. For example, HSI field officials stated that the Shadow Wolves' traditional tracking and interdiction role had diminished in utility given changes such as the increased presence of Border Patrol on and around the reservation in recent decades. However, Shadow Wolves members we interviewed said they did not believe either Border Patrol operations or a Shadow Wolves unit focusing on investigation fulfilled the ongoing need for drug interdiction efforts in the region. Specifically, Shadow Wolves members said they were effective due in part to their traditional tracking skills and ability to operate more discreetly than Border Patrol agents. We recommended that ICE define the mission and goals of the program, with input from the Tohono O'odham Nation. ICE concurred with this recommendation and has taken some steps to address it.

In July 2024, ICE developed a document defining the mission and goals of the Shadow Wolves program. The document stated that the mission of the program is "to investigate, disrupt, and dismantle terrorist, transnational, and other criminal organizations that threaten or seek to exploit the customs and immigration laws of the United States." Following this program mission statement, the document stated that "due to the Shadow Wolves cultural heritage and specialized skillsets as Native American law enforcement officers, the Shadow Wolves are uniquely positioned to operate successfully on Tribal Lands throughout the United States and as such, are focused on conducting community impact investigations targeting [transnational criminal organizations] TCO members who exploit the Tohono O'odham Nation and Tohono O'odham tribal members." HSI officials similarly stated that the program's mission is the same as missions held by other investigative units in HSI, but with a unique focus on tribal lands. In

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<sup>8</sup>Shadow Wolves' prior focus on interdiction included using traditional Indigenous tracking methods and technology to seize narcotics. Traditional Indigenous tracking skills originate from the history and culture of various Tribes, based on knowledge passed down from generation to generation, according to Shadow Wolves members. This includes animal tracking related to traditional hunting, farming and gathering, and nomadic living.

<sup>9</sup>[GAO-24-106385](#). We also reported that, following the shift in focus to investigations, Shadow Wolves no longer patrolled the reservation, focused on interdiction activities, or conducted traditional tracking. Shadow Wolves' investigative duties included gathering evidence, serving warrants, and making arrests.

July 2025, a senior HSI official stated that HSI had not made changes to the program's mission and had not developed written goals for the program.

Identifying this mission statement was a positive step toward addressing the intent of our recommendation. However, the extent to which the Shadow Wolves unit's current activities align with this mission to focus on tribal lands is unclear, and HSI and Shadow Wolves members provided us with varying perspectives on their current mission and activities. Specifically, in July 2025, HSI officials stated that the five members of the Shadow Wolves unit were working full-time on counter-narcotics investigations and interdictions on the Tohono O'odham Nation reservation. In August 2025, a senior HSI official stated that the Shadow Wolves have not conducted immigration enforcement on the Tohono O'odham Nation reservation because their focus has been on narcotics but stated that HSI is considering the potential for the Shadow Wolves to investigate human smuggling operations and participate in related immigration enforcement actions within the reservation. This official stated that in his view, HSI would not assign the Shadow Wolves unit to conduct immigration enforcement outside the Tohono O'odham Nation reservation. However, in August 2025, members of the Shadow Wolves unit stated that three of the five remaining Shadow Wolves members had been conducting U.S. interior immigration enforcement in Tucson, Arizona—outside the Tohono O'odham Nation reservation—full-time since January 2025. In December 2025, an official stated that HSI's priorities shifted in 2025, and as a result, members of the Shadow Wolves unit deployed to conduct immigration enforcement efforts in other locations in support of those new priorities.

In addition, as we reported in November 2024, ICE's defined goals for the Shadow Wolves program did not align with the program's mission or describe the results it hopes to achieve.<sup>10</sup> Specifically, in the July 2024 document that identified the program's mission, ICE defined three staffing or expansion goals for the program: (1) to retain existing Shadow Wolves, (2) to recruit new Shadow Wolves, and (3) to expand comparable units to other tribal lands. While these goals are an important part of ICE's recruitment and retention strategy for the program, they are specific to staffing and expansion, rather than the overall mission or operational priorities of the program. As of September 2025, ICE had not established program goals related to the program's mission or operations.

Additionally, according to ICE officials, ICE had not shared the program's updated mission or the staffing and expansion-related goals with the Tohono O'odham Nation as of September 2025. ICE officials said that the HSI Sells office communicates regularly with the Tohono O'odham Police Department through the antitrafficking task force in which both the Shadow Wolves and police department participate.<sup>11</sup> ICE officials said that this communication provides the HSI Sells office with the Tohono O'odham Nation's input on criminal priorities and law enforcement needs. However, ICE has not sought the Tohono O'odham Nation's input on the Shadow Wolves mission and goals. HSI stated that they aim to meet with officials from the Tohono O'odham Nation to discuss the mission and goals of the Shadow Wolves unit; however, as of August 2025, HSI had not scheduled this meeting. In December 2025, an HSI official stated that ICE determines the mission and goals of the Shadow Wolves program, and input from the Tohono O'odham Nation would not alter the program's mission or goals. However, given that the Shadow Wolves program operates on the lands of the Tohono O'odham Nation, it

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<sup>10</sup>[GAO-25-107644](#).

<sup>11</sup>This task force, the Native American Targeted Investigations of Violent Enterprises Task Force, is a cooperative federal and tribal task force focused on drug smuggling operations throughout the Tohono O'odham Nation.

is important for HSI to include input from the Tohono O'odham Nation as HSI defines the mission and goals of the program, as we have previously reported.

We maintain that defining operational goals linked to the program's mission with input from the Tohono O'odham Nation can better position HSI to ensure that operations achieve desired outcomes, align with HSI's overall mission strategy, and that HSI and the Tohono O'odham Nation have a common understanding of the program's mission. Clearly defining the Shadow Wolves program mission and establishing operational goals are particularly important in light of the continued differing perspectives and lack of clarity on the mission and activities of the program on tribal lands.

### **ICE Has Not Revised Its Recruitment Strategy, Performed a Workforce Analysis, or Developed a Succession Plan for the Shadow Wolves Program**

In January 2024, ICE began the process of hiring new Shadow Wolves, including securing funding for vacant positions and posting a job announcement for these positions in September 2025. During this time, the number of Shadow Wolves members fell from eight in January 2024 to five as of August 2025. ICE has not yet conducted succession planning to account for pending Shadow Wolves retirements as we recommended in January 2024.

#### **ICE Posted a Shadow Wolves Job Opportunity Announcement in September 2025, but Has Not Revised Its Recruitment Strategy**

In January 2024, we reported that ICE's Shadow Wolves Enhancement Act strategy from October 2022 described general methods for recruiting Shadow Wolves, but did not include measurable goals, timelines, or milestones. We recommended that ICE update the strategy to include these elements, allowing ICE to review progress, assess effectiveness, and adjust its recruiting strategy if the agency is not meeting defined metrics. ICE concurred with this recommendation and has taken some steps to address it, such as posting a job opportunity announcement, but the agency has not updated its strategy to include measurable goals, timelines, or milestones.

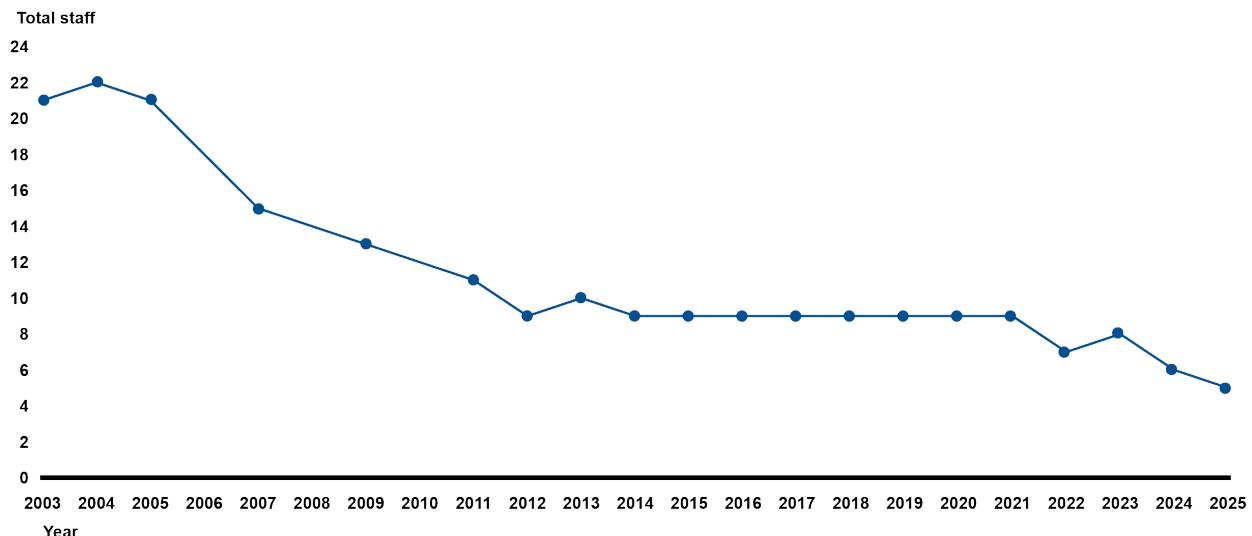
ICE began preparing to post a job opportunity announcement for vacant positions in the Shadow Wolves program in January 2024 and posted the announcement in September 2025. ICE delayed the posting several times, including in March and September 2024 and in July 2025. During this time, ICE officials stated they coordinated with the Bureau of Indian Affairs to develop a plan for verifying the American Indian ancestry of Shadow Wolves applicants.<sup>12</sup> ICE officials also stated that they postponed the job announcement in July 2025 to obtain approval from the Secretary of Homeland Security to proceed. ICE officials stated that they proactively decided to seek the Secretary's approval to ensure that the announcement was consistent with administration policies related to diversity, equity, and inclusion.

As we reported in November 2024, HSI field officials told us that ICE must move quickly to hire and onboard new recruits, enabling current Shadow Wolves to pass on the unit's culture, unique skills, and experience. The number of Shadow Wolves has fallen from 22 to five over the last 20 years, as shown in figure 1.

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<sup>12</sup>As previously discussed, Shadow Wolves must be certified to have at least one-quarter American Indian ancestry from a federally recognized Tribe.

**Figure 1: Number of Shadow Wolves, Calendar Years 2003 to 2025**



Source: GAO analysis of U.S. Immigration and Customs Enforcement (ICE) documents. | GAO-26-108546

Note: The Shadow Wolves program began with seven members in 1974. ICE does not have information on the number of Shadow Wolves employees from calendar years 1975 through 2002. Dots indicate years with available staffing data.

Further, officials did not identify any associated metrics or milestones for the announcement, such as a specific goal for the number of applicants or screening a specific number of applicants by a specific date. We maintain that ICE should develop and document measurable goals, timelines, and milestones so that officials can review progress, assess the effectiveness, and adjust the recruitment strategy if the agency is not meeting defined metrics.

#### ICE Has Not Performed a Workforce Analysis to Determine Shadow Wolves Program Staffing Needs

In January 2024, we also reported that ICE had not assessed the staffing needs of the Shadow Wolves unit on the Tohono O'odham Nation reservation. According to ICE officials, this was because ICE was still assessing how the unit would operate in a new environment with Shadow Wolves potentially classified as special agents.<sup>13</sup> We recommended that after defining the mission and goals of the Shadow Wolves program, ICE determine the staffing needs for the program on the Tohono O'odham Nation reservation, to include the skills and number of positions necessary. ICE concurred with this recommendation. However, as of December 2025, ICE has not performed a workforce analysis to determine the program's staffing needs, including the number and type of personnel the unit needs to meet operational demands consistent with our recommendation.

<sup>13</sup>Though current Shadow Wolves may choose whether to reclassify to special agent, ICE officials said they intend to hire new Shadow Wolves as special agents. The report accompanying the Shadow Wolves Enhancement Act from the House Committee on Homeland Security noted that the act seeks to address Shadow Wolves' unique limitations to career advancement, job mobility, and pay equity due to their classification. See H.R. Rep. No. 117-246, at 2 (2022). Outside of the Shadow Wolves program, HSI phased out its other tactical officer positions in favor of GS-1811 special agents. See S. Rep. No. 117-235, at 3 (2022).

In December 2025, HSI officials stated that they have met with a senior DHS advisor for Indian affairs and planned to hold additional meetings with senior DHS and Department of the Interior officials to discuss staffing needs for the Shadow Wolves program. This is a positive step, and we maintain that once ICE defines the program's goals, determining the program's staffing needs will better position ICE to develop recruitment plans that will help it accomplish the program's current goals on the reservation.

#### ICE May Require Current Members of the Shadow Wolves Unit to Reclassify as Special Agents

In January 2024, we reported that ICE's Shadow Wolves Enhancement Act strategy identified allowing Shadow Wolves to reclassify to special agent as the agency's primary tool for retaining Shadow Wolves. In June 2024, ICE developed personalized information and briefed or notified each Shadow Wolves member on how reclassification to special agent would affect their pay and retirement compensation, and the extent to which ICE would require polygraph examinations, medical and physical fitness testing, and training to reclassify. As of September 2025, no Shadow Wolves have reclassified as special agents. However, ICE officials stated that the five members of the Shadow Wolves unit will need to reclassify as special agents once ICE hires new special agents for the program through the recent job announcement. A representative of the Shadow Wolves unit stated that some members were willing to reclassify as special agents, provided that they receive waivers for completing special agent training; however, other members told us they were not willing to reclassify, as of September 2025. Further, an HSI official noted that allowing Shadow Wolves to reclassify could create additional vacancies within the Shadow Wolves program, as reclassified staff would be able to transfer to special agent positions in other HSI offices. ICE officials stated that they had not reached a decision regarding waivers for the requirement for existing Shadow Wolves to complete the special agent training.

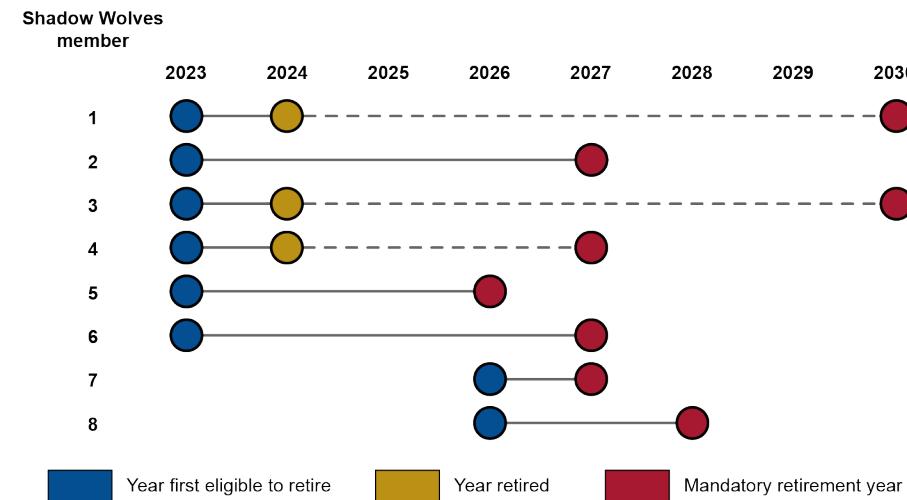
#### All Five Remaining Shadow Wolves are Retirement Eligible, but ICE Has Not Developed a Succession Plan

At the time of our January 2024 report, six of the eight Shadow Wolves were already eligible to retire, with the remaining two eligible in fiscal year 2026. We also reported that all eight Shadow Wolves would be subject to mandatory retirement by the end of fiscal year 2030, including one by the end of fiscal year 2026 and an additional four by the end of fiscal year 2027 (see fig. 2).<sup>14</sup> In addition, three Shadow Wolves retired in 2024.

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<sup>14</sup>Mandatory retirement age for federal law enforcement personnel is set by statute. Generally, federal law enforcement personnel must retire at the age of 57. However, if the employee has not completed 20 years of certain specialized service when they reach 57, they are subject to mandatory retirement when they complete 20 years of certain specialized service. The head of a federal agency may exempt certain law enforcement officers from mandatory retirement until the age of 60. See 5 U.S.C. § 8425(b). The President may exempt certain employees from automatic separation if the President determines the public interest so requires it. See 5 U.S.C. § 8425(e).

**Figure 2: Timeline of Shadow Wolves' Retirement Eligibility and Mandatory Retirement by Fiscal Year, as of August 2025**



Source: GAO analysis of U.S. Immigration and Customs Enforcement information. | GAO-26-108546

Note: This timeline shows the retirement trajectories for the eight members of the Shadow Wolves unit at the time of our first report on this program in January 2024 (GAO-24-106385). Since that report, three members of the Shadow Wolves unit have retired as depicted with the yellow circles above. Mandatory retirement age for federal law enforcement personnel is set by statute. Generally, federal law enforcement personnel must retire at the age of 57. However, if the employee has not completed 20 years of certain specialized federal service when they reach 57, they are subject to mandatory retirement when they complete 20 years of certain specialized federal service. The head of a federal agency may exempt certain law enforcement officers from mandatory retirement until the age of 60. See 5 U.S.C. § 8425(b). The President may exempt certain employees from automatic separation if the President determines the public interest so requires it. See 5 U.S.C. § 8425(e).

We recommended in January 2024 that ICE develop a succession plan to account for upcoming Shadow Wolves retirements.<sup>15</sup> ICE concurred with our recommendation and posted a job announcement in September 2025 designed to address recent retirements by hiring additional Shadow Wolves. According to ICE officials, hiring new Shadow Wolves in the Sells, Arizona field office will allow experienced Shadow Wolves members to train new recruits, including educating them on traditional tracking skills. Posting the job announcement is a positive step, however, we maintain that developing a succession plan would better position ICE to ensure experienced Shadow Wolves will be available to train new recruits.

### ICE Has Not Evaluated the Possible Expansion of the Shadow Wolves Program

ICE's October 2022 Shadow Wolves Enhancement Act strategy described the agency's plans at a high level for evaluating the expansion of the Shadow Wolves program. In January 2024, we reported that ICE had outlined steps that it planned to take to evaluate possible expansion locations. The steps included coordinating with tribal leaders, engaging with ICE field officials, and conducting site visits to assess the feasibility and appropriateness of expansion. However, we found that ICE had not developed criteria for evaluating potential expansion locations and recommended ICE do so. ICE concurred with our recommendation and took some steps to implement it.

In July 2024, ICE broadly defined elements of the criteria that would enable it to select new locations for expanding the Shadow Wolves program to other tribal lands. Those elements are

<sup>15</sup> GAO-24-106385.

the willingness of partnering Tribal Nations, the level of criminal activity in the possible locations, and the availability of funding and HSI field office resources. However, ICE did not detail how it will apply these broad expansion criteria to its decisions about expanding the Shadow Wolves program to new locations. In August 2025, HSI headquarters and field office officials stated that expansion efforts are on hold due to a lack of funding for Shadow Wolves positions outside of the Sells, Arizona HSI office. Although expansion efforts are paused, we maintain that developing criteria for evaluating and selecting expansion locations when those efforts restart could help ensure ICE evaluates locations consistently while improving the transparency of the evaluation process.

### **Agency Comments**

We provided a draft of this report to DHS for review and comment. DHS provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, and other interested parties. In addition, the report is available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at [GamblerR@gao.gov](mailto:GamblerR@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are Ashley Davis (Assistant Director), Mara McMillen (Analyst in Charge), Nasreen Badat, Justin Bolivar, Benjamin Crossley, Michele Fejfar, Paige Gilbreath, Samantha Lyew, Leslie Pollock, and Rebecca Sero.

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Rebecca Gambler  
Director, Homeland Security and Justice

## Enclosure I: Status of GAO Recommendations Regarding the Shadow Wolves Program

In January 2024, we made six recommendations to ICE to address issues pertaining to the Shadow Wolves program.<sup>16</sup> ICE concurred with the six recommendations. It has implemented one recommendation and has partially addressed three of the remaining five as shown in Table 1 below. We maintain that all the recommendations should be implemented to help ensure that the program continues to operate in areas that may be vulnerable to cross-border illicit activity and will continue to assess ICE's progress.

**Table 1: GAO Recommendations to U.S. Immigration and Customs Enforcement (ICE) Regarding Shadow Wolves Program Operations and Management**

Recommendation	Status
The Director of ICE should define the mission and goals of the Shadow Wolves program, with input from the Tohono O'odham Nation. (Recommendation 1)	<b>Open—Partially Addressed:</b> In July 2024, ICE provided us documentation of the agency's efforts to define the mission of the Shadow Wolves program. The documents also identified goals related to Shadow Wolves staffing. These efforts are a positive step forward and partially address our recommendation. However, the goals ICE provided did not align with the program's mission or describe the operational results it hopes to achieve. Further, ICE had not sought the Tohono O'odham Nation's input on the Shadow Wolves program's mission and goals. We will continue to monitor ICE's efforts to define goals related to the mission of the Shadow Wolves program and to gather input from the Tohono O'odham Nation on the Shadow Wolves program's mission and mission-related goals.
The Director of ICE should, after defining the mission and goals of the Shadow Wolves program, determine the staffing needs, to include the skills and number of positions necessary, for the Shadow Wolves program on the Tohono O'odham Nation reservation. (Recommendation 2)	<b>Open—Partially Addressed:</b> In July 2024, ICE provided us documents that described a staffing goal of hiring four additional Shadow Wolves. ICE's efforts partially address this recommendation. However, ICE has not performed a workforce analysis to determine the program's staffing needs, including the number and type of personnel that the Shadow Wolves unit on the Tohono O'odham Nation reservation needs to meet operational demands. We continue to believe that, once ICE defines the program's goals, determining the program's staffing needs will better position ICE to develop recruitment plans that will help them accomplish program goals.

<sup>16</sup>[GAO-24-106385](#).

Recommendation	Status
<p>The Director of ICE should update the Shadow Wolves Enhancement Act strategy to include measurable goals, timelines, and milestones for recruiting Shadow Wolves. (Recommendation 3)</p>	<p><b>Open:</b> In July 2024, ICE provided us documentation that identified a timeline and a goal for hiring the first new Shadow Wolves members since 2007. However, ICE delayed posting the position announcement multiple times before posting it in September 2025. We maintain that ICE should develop and document measurable goals, timelines, and milestones for recruitment so officials can review progress, assess the effectiveness of the recruitment strategy, and adjust the strategy if the agency is not meeting defined metrics.</p>
<p>The Director of ICE should provide each member of the Shadow Wolves with information required to make an informed decision about reclassifying to special agent. Such information includes individualized information about how reclassification would affect pay and retirement compensation and the steps each member of the Shadow Wolves must complete for reclassification. (Recommendation 4)</p>	<p><b>Closed—Implemented:</b> In July 2024, ICE provided us documents that ICE's Office of Human Capital created for each Shadow Wolves employee. These documents included individualized estimates of how reclassifying to special agent would affect the employee's pay and retirement compensation, as well as information about the extent to which ICE would require polygraph examinations, medical and physical fitness testing, and training in order to reclassify. ICE also provided documentation demonstrating that its Office of Human Capital had scheduled individual meetings with each Shadow Wolves employee to discuss this information. These efforts address the intent of our recommendation. As a result, Shadow Wolves employees are better positioned to make an informed decision about whether reclassification is appropriate for them.</p>
<p>The Director of ICE should develop a succession plan to address upcoming retirements from the Shadow Wolves program. (Recommendation 5)</p>	<p><b>Open:</b> In July 2024, ICE provided us documentation that identified a plan for expediting hiring of new Shadow Wolves members to address pending retirements. However, ICE did not develop a succession plan that accounts for future mandatory retirements. We maintain that developing a succession plan would better position ICE to ensure experienced Shadow Wolves will be available to train new recruits.</p>

Recommendation	Status
The Director of ICE should develop criteria for evaluating and selecting Shadow Wolves expansion locations. (Recommendation 6)	<p><b>Open—Partially Addressed:</b> In July 2024, ICE broadly defined elements of the criteria that would enable it to evaluate new locations for expanding the Shadow Wolves program to other tribal lands. These included the willingness of partnering Tribal Nations, the level of criminal activity in the possible locations, and the availability of funding and Homeland Security Investigations field office resources. However, ICE did not detail how it will apply these elements to its decisions about whether expanding to each potential location is feasible and appropriate. We maintain that developing criteria for evaluating and selecting expansion locations could help ensure ICE evaluates locations consistently while improving the transparency of the evaluation process.</p>

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## General Inquiries

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