



August 2023

# HOMELAND SECURITY

## Joint Requirements Council Needs Leadership Attention to Improve Effectiveness

Accessible Version

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#### Why GAO Did This Study

In November 2014, in response to a GAO recommendation, DHS reestablished the JRC to develop and lead a component-driven requirements process to inform investment decisions and to reduce unnecessary duplication, overlap, and redundancy. In 2016, GAO found that the JRC's initial management approach was sound but at the time it had not yet completed a process to identify priorities and inform investment decisions.

GAO was asked to review the effectiveness of the JRC's current operations. This report addresses, among other objectives, the extent to which the JRC (1) has designated and validated joint capabilities and requirements; (2) has engaged with DHS leadership; and (3) is positioned to conduct its mission.

GAO reviewed relevant DHS and JRC policies, guidance, and documentation. GAO also interviewed DHS and JRC officials.

#### What GAO Recommends

GAO is making six recommendations to DHS, including that it ensures the JRC demonstrates that joint capability documents fully meet key criteria prior to validating them; ensures regular engagement between the JRC and leadership; and reconsiders the placement of the JRC. DHS concurred with all six recommendations, but for two described actions that would not meet their intent as discussed in the report.

View [GAO-23-106125](#). For more information, contact Marie A. Mak at (202) 512-4841 or [MakM@gao.gov](mailto:MakM@gao.gov).

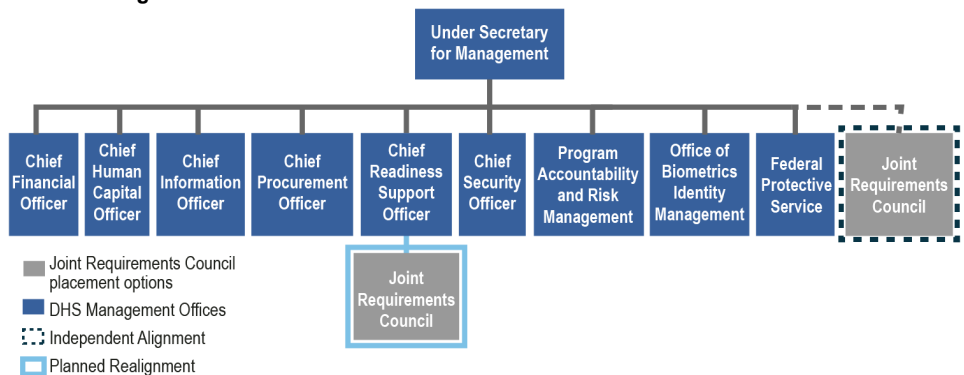
#### What GAO Found

The Joint Requirements Council (JRC) seeks to create efficiencies by identifying opportunities for components within the Department of Homeland Security (DHS) to develop joint capabilities if they have similar mission needs. Since 2018, the JRC has designated five capabilities as joint. However, the JRC validated four of these as joint capabilities even though the documents that components submitted to assess the capability did not fully meet key criteria required in its guidance. For example, three documents partially met the criterion to quantify the capability gap, which helps determine risk associated with not addressing it. Ensuring these documents fully meet criteria better positions DHS to pursue solutions that are well-defined and will meet mission needs.

The JRC was also established to be a recommending body to DHS leadership but leadership has not regularly engaged with the JRC. For example, it did not participate in the review and validation of the joint capabilities that JRC designated for its attention, and it has not met with the JRC since 2015. This limits DHS's ability to fully realize the JRC's strategic value to identify opportunities for joint solutions and help use resources efficiently.

DHS plans to realign the JRC from reporting to the Office of the Secretary to the Office of the Chief Readiness Support Officer within the Management Directorate. GAO found that this realignment could limit the JRC's ability to independently oversee the requirements development process because it would not be a separate management function. GAO has reported on the importance of the requirements function to be independent.

**Organizational Structure of DHS's Management Directorate and the Joint Requirements Council Realignment**



Source: GAO analysis of Department of Homeland Security (DHS) documentation. | GAO-23-106125

Further, GAO found that the Office of the Chief Readiness Officer, which oversees department-wide logistics, had the fewest responsibilities in the Management Directorate that aligned with the JRC's mission. The office is also not well-positioned to assist the JRC with overseeing DHS's requirements development process because it is not a principal member of the Council. As a result, this move could limit the JRC's ability to fully execute its roles and responsibilities.

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## Abbreviations

DHS	Department of Homeland Security
DMAG	Deputy's Management Action Group
IT	Information Technology
JRC	Joint Requirements Council
JRIMS	Joint Requirements Integration and Management System

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August 30, 2023

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

The Honorable J. Luis Correa  
Subcommittee on Border Security and Enforcement  
Committee on Homeland Security  
House of Representatives

The Honorable Glenn F. Ivey  
Ranking Member  
Subcommittee on Oversight, Investigations, and Accountability  
Committee on Homeland Security  
House of Representatives

Each year, the Department of Homeland Security (DHS) invests billions of dollars in major acquisition programs—those assets with total estimated costs of \$300 million or more—to assist in executing its many critical missions. In November 2014, in response to our recommendation, the department reestablished the Joint Requirements Council (JRC), which was previously dissolved in 2006, to develop and lead a component-driven requirements process to inform investment decisions and determine the need for major acquisition programs. The JRC is intended to help the department use its finite resources efficiently by assessing capability needs early in the acquisition life cycle. Doing so would help to reduce unnecessary duplication, overlap, and redundancy and identify opportunities to develop joint capabilities—applicable to more than one component—among the components with similar mission needs.<sup>1</sup> Through the JRC, DHS oversees components’ development of capability gaps and requirements—the means to accomplish a mission or objective—to ensure that they align with DHS’s strategic goals, are cost-

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<sup>1</sup>We developed a guide for analysts, consultants, and policymakers to identify and evaluate instances of fragmentation (more than one federal agency involved in the same broad area), overlap (multiple agencies or programs with similar goals, activities, or beneficiaries), and duplication (two or more agencies or programs engaged in the same activities or services to the same beneficiaries) among programs. See GAO, *Fragmentation, Overlap, and Duplication: An Evaluation and Management Guide*, [GAO-15-49SP](#) (Washington, D.C.: Apr. 14, 2015).

informed, and feasible. Among other responsibilities, the JRC validates and prioritizes joint and component-specific capability gaps and associated requirements for DHS's 14 operational and support organizations. It does this, in part, through the Joint Requirements Integration and Management System (JRIMS) process.

In 2016, we found that the JRC's structure and management approach was generally consistent with key practices for mergers and organizational transformations and that it had begun to review and validate components' capability and requirements documents. At that time, the JRC was developing a process to prioritize them to inform budget decisions.<sup>2</sup> The JRC has since refined its processes and procedures for overseeing the department's component-driven requirements process. However, in 2019, we reported that the JRC could better fulfill its mission by identifying overlapping or common requirements and communicating these to senior leadership to help ensure that DHS maintains a balanced portfolio of investments and uses its finite investment resources wisely.<sup>3</sup>

You requested that we review the effectiveness of the JRC's current operations. This report addresses the extent to which the JRC: (1) has designated and validated joint capabilities and requirements; (2) has prioritized capabilities and associated requirements to inform investment decisions; (3) has engaged with DHS leadership; and (4) is positioned organizationally and staffed to conduct its mission.

To address the first objective, we reviewed the JRC's JRIMS Instruction Manual—its JRIMS management policy—and related process materials. Our review included all Capability Analysis Reports—the first JRIMS document that the JRC validates—that were submitted by components to the JRC for designation and validation between September 2018 and December 2022 and determined to be joint through the JRIMS process. Specifically, we analyzed the final versions of the five, joint Capability Analysis Reports submitted between September 2018 and December 2022. This included the supporting scorecards, which the JRC uses to

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<sup>2</sup>GAO, *Homeland Security Acquisitions: Joint Requirements Council's Initial Approach Is Generally Sound and It Is Developing a Process to Inform Investment Priorities*, [GAO-17-171](#) (Washington, D.C.: Oct. 24, 2016).

<sup>3</sup>GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: Mar. 6, 2019).

evaluate how well each document followed the JRC's guidance as established in the JRIMS Instruction Manual.

To address the second objective, we reviewed DHS policies—such as the directive that established the JRC's responsibilities—and supporting documentation including data from JRC's Capability Gap Register and a selection of validated JRIMS documents. Specifically, we reviewed 11 JRIMS documents that had capability gaps designated in the Capability Gap Register as either joint or priority that were also validated after September 2018, when the JRC last updated its JRIMS Instruction Manual. We compared the information in these selected documents against the capability gaps listed in the Capability Gap Register to determine traceability between the two sources and assess the register's reliability. We found that the gaps in the Capability Gap Register generally traced to the selected source documents and determined that it was reliable for the purposes of reporting how the JRC used the register to collect and maintain information on capability gaps.

To address the third objective, we reviewed JRC meeting schedules and agendas to determine if leadership officials were in attendance. We supplemented our review of meeting materials by interviewing JRC officials about their level of engagement with DHS leadership and requested written responses from DHS leadership about its interactions with the JRC. We also reviewed all joint JRIMS documents designated for leadership's attention between September 2018 and December 2022 to determine the extent to which leadership was involved in the review or validation of these documents.

To address the fourth objective, we reviewed documents including the office's delegation of responsibilities, organizational charts, budget requests, and past contracts awarded for analytic and program management support assistance. We also reviewed DHS's plan to realign the JRC from the Office of the Secretary to the Management Directorate. We assessed the extent to which the offices considered for the JRC's placement had current responsibilities, as established in DHS policies, that aligned, partially aligned, or did not align with the JRC's key responsibilities.

We supplemented our analysis by interviewing the JRC officials responsible for overseeing JRIMS and related processes. We also interviewed representatives from selected components who contributed to the development of joint capability JRIMS documents and the Deputy's Management Action Group (DMAG)—DHS's decision-making body.

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Appendix I presents a more detailed description of the objectives, scope, and methodology for our review.

We conducted this performance audit from June 2022 to August 2023 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.

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## Background

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### History of the Joint Requirements Council

In 2003, DHS established a JRC that was responsible for identifying overlapping or common requirements and helping to determine how best to ensure that DHS used its finite investment resources wisely. However, in 2006, the JRC stopped meeting after the chair was assigned to other duties within the department. In 2008, we reported that DHS had not effectively implemented or adhered to its review process for major acquisitions. We attributed this, in part, to the fact that the JRC had not effectively carried out its oversight responsibilities and lacked sufficient resources such as personnel to support its intended oversight role. We recommended that DHS reinstate the JRC or establish another departmental joint requirements oversight board to review and approve acquisition requirements and assess potential duplication efforts.<sup>4</sup>

In 2014, the Secretary of Homeland Security directed the creation of a joint requirements process, led by a component-composed and component-chaired JRC. The current JRC consists of a chairperson and 14 members called principals. The principals are senior executives or officers that represent key DHS headquarters offices and the department's eight operational components. The JRC chairperson rotates annually among the eight operational components. JRC principals are responsible for representing the views of their components or office leadership, endorsing and prioritizing validated capability needs and operational requirements (user-defined performance parameters outlining

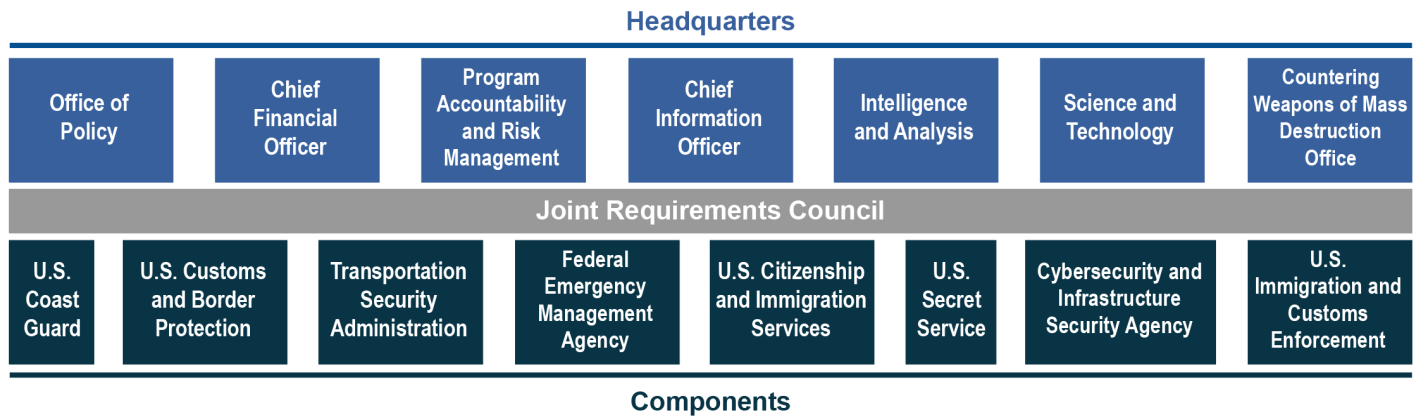
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<sup>4</sup>GAO, *Department of Homeland Security: Billions Invested in Major Programs Lack Appropriate Oversight*, [GAO-09-29](#) (Washington, D.C: Nov. 18, 2008).



what a system must do), and making recommendations that are supported by analytical rigor. Figure 1 shows the configuration of the JRC as of December 2022.

**Figure 1: Joint Requirements Council Membership**



Source: GAO review of Department of Homeland Security documentation. | GAO-23-106125

The JRC Director leads day-to-day operations of the JRC. Among other responsibilities, the JRC Director serves as the JRIMS validation authority on behalf of the JRC. The JRC Director is supported by permanent staff who are organized into two parts—an analysis section and a program management office. JRC’s analysis staff primarily review JRIMS documents, conduct and oversee requirements analyses, and interface with DHS components. The program management office handles executive-level communication and preparation, conducts office operations and maintenance, and develops longer-term strategic initiatives for the JRC.

The JRC is intended to build a more unified, effective, and efficient organization through the creation of a component-driven joint requirements process. Key responsibilities of the JRC include:

- **JRIMS oversight.** The JRC is responsible for overseeing and managing the department’s JRIMS process by reviewing and validating capability gaps—and the requirements to mitigate those gaps. Through this process, the JRC provides DHS leadership with cost-informed recommendations on capability needs and materiel or non-materiel courses of action for addressing them.

- **Joint Assessment of Requirements.** The JRC is to lead an annual assessment that integrates input from offices across the department to prioritize emerging capability gaps and existing program requirements for DHS leadership to use when making budget decisions.
- **Requirements policies, processes, and training.** The JRC is responsible for developing and managing the department's policies and processes to validate mission capability requirements. The JRC also is to develop and provide requirements-related training to support the DHS workforce.

The JRC provides input to two senior-level entities:

- **Deputy's Management Action Group (DMAG)** is a decision-making body that is chaired by the Deputy Secretary. Its membership consists of the DHS Chief of Staff, DHS Under Secretaries, senior operational component deputies and select support component deputies, and the Chief Financial Officer. The JRC was established as a recommending body to the DMAG. The JRC is also directed to provide recommendations to the DMAG for consideration in the annual Program and Budget Review, which reflects DHS's investment priorities. The DMAG reviews JRC-validated capability needs and recommendations, provides direction and guidance to the JRC, and endorses or directs related follow-on JRC activities.
- The JRC Director is a member of the **Acquisition Review Board**, which reviews major acquisition programs for management, accountability, and alignment with the department's strategic initiatives at key milestones, called acquisition decision events. The board is chaired by the acquisition decision authority or a designee and consists of members and representatives who manage DHS's mission objectives, resources, and contracts. The JRC advises the Acquisition Review Board on capability gaps, needs, and requirements at key milestones in the acquisition life cycle.

The JRC also provides input to the budgeting process through various DHS organizations, such as the Chief Financial Officer's Council and Program Analysis and Evaluation. For example, the JRC is to review components' funding requests to ensure they contain validated capability gaps and requirements from the JRIMS process.<sup>5</sup>

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<sup>5</sup>DHS Instruction 101-01-001, *Planning, Programming, Budgeting, and Execution* (June 11, 2019).

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## Tracing Mission Needs to Program Requirements

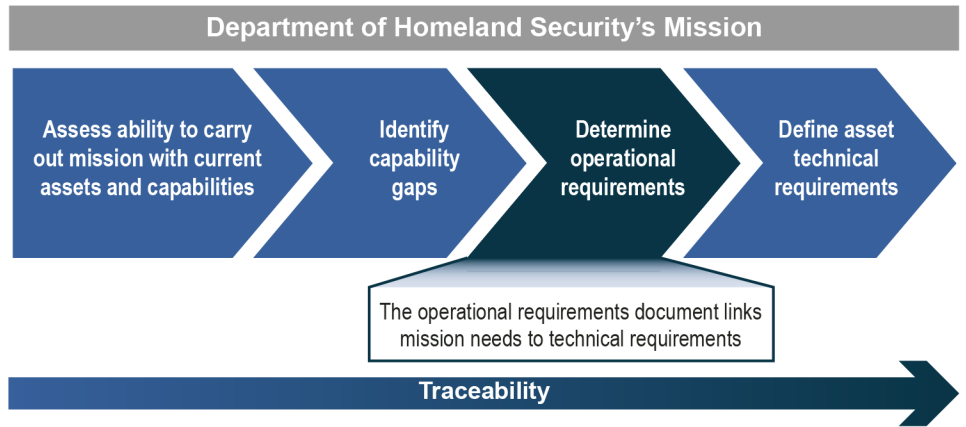
DHS generally defines a capability as the means to accomplish a mission or objective that may be achieved through materiel and non-materiel solutions.<sup>6</sup> DHS identifies capability needs through a number of sources, including requests from component leadership, a capability gap analysis, or external direction from legislation or the President. The JRC validates those capabilities that DHS needs to better fulfill a mission or objective. Once the component has a JRC-validated capability gap, and identifies and documents the need for a materiel solution, it develops the operational requirements. Requirements can be unique to an individual component, or they can be joint requirements that apply to more than one component.

The DHS requirements development process generally starts with the identification of mission needs and broad capability gaps from which components develop a program's operational requirements, key performance parameters, and more definitive technical requirements. Figure 2 depicts this traceability from mission needs to technical requirements.

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<sup>6</sup>Examples of non-materiel solutions include modifying policy, establishing new policy, or establishing a training program to mitigate or close a capability gap. Non-materiel solutions are documented in a non-materiel change recommendation as part of the JRIMS process. If the non-materiel solution only impacts the sponsoring organization, it is reviewed and validated at the sponsor level. If the non-materiel solution requires coordination with multiple entities, then the JRC reviews and validates the proposed recommendation.

**Figure 2: Traceability from Capabilities to Technical Requirements**



Source: GAO analysis of Department of Homeland Security documentation. | GAO-23-106125

## JRIMS Process

DHS issued policies and guidance that establish the framework for the department's JRIMS process and how key required capability and requirements documents are sequenced in relation to the DHS acquisition life cycle. Through the JRIMS process, DHS components identify capability gaps, associated operational requirements, and proposed solutions to mitigate those gaps in specific documents. The type of JRIMS documents that components develop is dependent on whether components pursue materiel or non-materiel solutions to address identified capability gaps. For example, components do not develop operational requirements if they are pursuing a non-materiel solution. However, in some cases, components may pursue a materiel solution to address specific capability gaps and address remaining gaps through non-materiel solutions. See table 1 for a description of the documents that components can develop and submit into the JRIMS process.

**Table 1: Key Documents Submitted into the Joint Requirements Integration and Management System Process**

Document	Description
Capability Analysis Study Plan	Provides greater visibility across DHS into ongoing studies and assessments to encourage collaboration across components, leverage existing DHS efforts, and eliminate unnecessary duplication of current study efforts.

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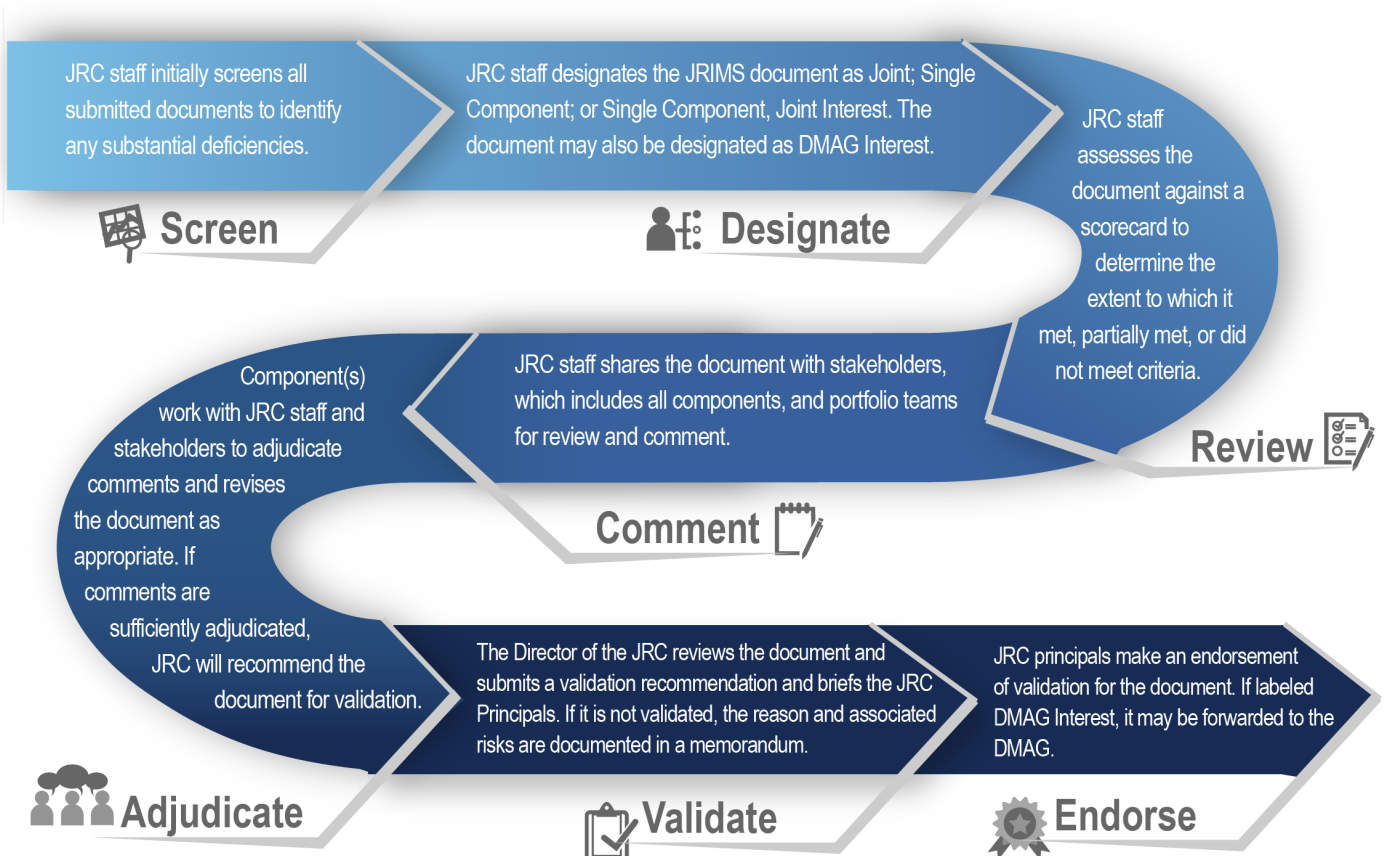
Letter

Document	Description
Capability Analysis Report	Provides an assessment of the department's ability to fulfill a mission, objective, or function. Identifies capability gaps, redundancies, and overlaps; and provides recommendations for either a materiel or non-materiel approach to mitigate those gaps or overlaps.
Non-Materiel Change Recommendation	Provides an assessment of how a non-materiel solution can mitigate one or more identified capability gaps identified in the Capability Analysis Report without the need for additional requirements documents.
Urgent Operational Need	Provides rapid fielding of a solution or solutions to mitigate a materiel capability gap caused by a shift in the threat or hazard environment. If not addressed in an expedited manner (e.g., fielded capability in less than 1 year), this shift in the threat or hazard could result in loss of life or imminent failure to a mission, function, or objective.
Mission Need Statement	Provides a high-level description of the mission need, whether from a current or impending gap. Outlines only the concept of the solution to fill the gap and does not provide information on specific types of acquisitions that could provide that capability.
Concept of Operations	Provides a description of how an asset, system, or capability will be employed and supported. Identifies the capabilities needed to perform the missions and fill the gaps expressed in the Mission Need Statement.
Operational Requirements Document	Provides a number of performance parameters that must be met by a program to provide useful capabilities to the operator by closing capability gaps identified in the Mission Need Statement.

Source: GAO analysis of Department of Homeland Security (DHS) documentation. | GAO-23-106125

The JRIMS manual provides component and program officials with specific guidance for identifying capability gaps and requirements, developing appropriate capability documentation like a Capability Analysis Report, and obtaining JRC review or validation of those documents, including timelines and scorecards for the review process. See figure 3 for an overview of the JRIMS process.

**Figure 3: Overview of the Joint Requirements Integration and Management System (JRIMS) Process**



JRC=Joint Requirements Council  
DMAG=Deputy's Management Action Group

Source: GAO analysis of the Joint Requirements Council's JRIMS Instruction Manual. | GAO-23-106125

**Screening and designation.** DHS components submit JRIMS documents to JRC staff who initially screen them to identify any substantial deficiencies. If the document is complete, the JRC staff designate the document as Joint; Single Component; or Single Component, Joint Interest. Documents may also be designated as DMAG Interest in addition to being designated as Single Component or Joint Interest.

**Joint Requirements Integration and Management System (JRIMS) Designations**

- **Joint.** Document explicitly applies to more than one Department of Homeland

Security (DHS) component, or is co-sponsored by more than one DHS component.

- **Single Component.** Document that impacts the activities, operations, or organizations of one component.
- **Single Component, Joint Interest.** Document impacts a single component but has the potential to apply to another component where shared capabilities could exist.
- **Deputy's Management Action Group (DMAG) Interest.** Document is highly visible, has politically sensitive issues, potential interagency impact, resulted from DMAG-directed analysis, or will likely support major acquisition programs.

Source: GAO review of DHS's JRIMS Instruction Manual. | GAO-23-106125

This designation determines who reviews and validates the document. Documents designated as Joint or DMAG Interest are coordinated department-wide, reviewed by JRC staff and all interested stakeholders, and validated by the JRC Director. Documents designated as Single Component are also reviewed by JRC staff but are validated by the Component's Requirements Executive—the senior official responsible for managing, administering, and overseeing their component's requirements policies and processes.

**Review and comment.** JRC staff assess the document for compliance with criteria identified in the JRIMS Manual. Using a scorecard, JRC staff determine the extent to which it met, partially met, or did not meet key criteria, among others. According to the JRIMS Instruction Manual, if a document does not meet all key criteria, then it should not receive a recommendation for validation. The JRC also shares the document with stakeholders, which includes all components, and portfolio teams for review and comment.<sup>7</sup>

**Adjudication.** At the end of the review and comment stage, JRC staff shares comments with the sponsor—the component that submitted the document—for adjudication. The sponsor works with stakeholders to adjudicate comments and revise the document as appropriate. Sponsors also notify stakeholders to confirm if proposed adjudications will satisfy the stakeholders' critical comments. The revised document is signed by the Component Requirements Executive and re-submitted along with disposition of all comments received to the JRC for review and validation. JRC staff review the revised document to ensure critical comments have been sufficiently adjudicated before recommending the document for validation.

**Validation and endorsement.** The JRC Director reviews the document and develops a draft validation recommendation for the JRC principals' consideration before validating it. Intent to validate a document by the JRC indicates that the document meets JRIMS criteria. If the Director decides to not validate it, this decision, reason, and associated risks are documented in a memorandum. The JRC Director submits the

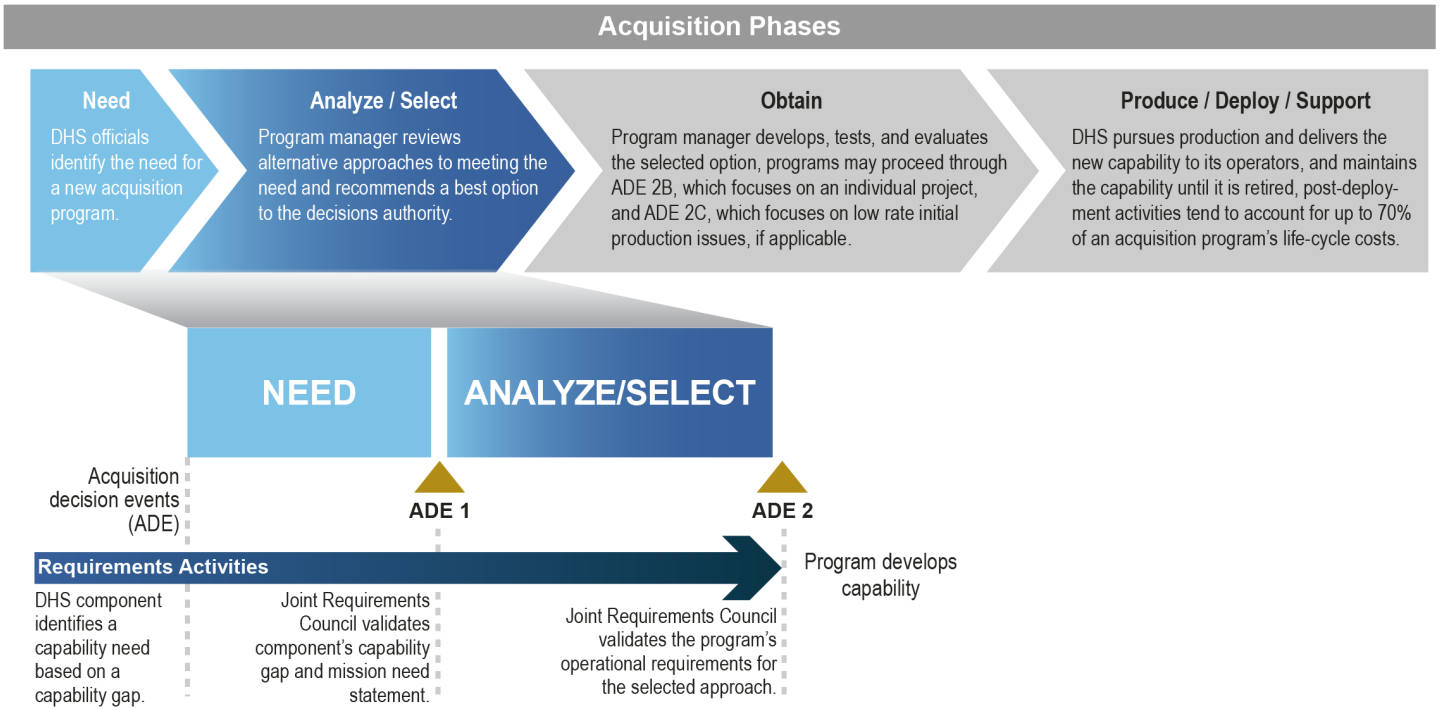
<sup>7</sup>The JRC charters portfolio teams to oversee designated functional areas that comprehensively cover the department's array of capabilities. The portfolios comprise component and headquarter office subject matter experts from across the department. The JRC initially stood up portfolio teams that were aligned to each of DHS's functional areas, but according to JRC officials has since transitioned to chartering portfolio teams for specific tasks, purposes, and durations.

recommendation to the JRC principals for their endorsement and briefs the JRC principals, verbally or in writing, of any issues for discussion. Validated documents designated as DMAG-Interest are initially endorsed by the JRC principals but may also be forwarded to the DMAG as the final endorsing authority.

The JRIMS manual also provides an overview of how key capability and requirements documents are sequenced in relation to the DHS acquisition life-cycle framework. DHS uses a four-phase acquisition life-cycle framework to manage acquisition programs and review programs at a series of predetermined acquisition decision events to assess whether the program is ready to proceed through the acquisition life-cycle phases. Under the JRIMS process, components submit key capability and requirements documentation to the JRC for review and validation at designated points in the acquisition life-cycle framework or when changes are made to these documents. Figure 4 provides an overview of DHS's acquisition life-cycle framework, including the relation to requirements activities.



**Figure 4: Selected Requirements Activities within the DHS Acquisition Life Cycle for Major Acquisition Programs**



Source: GAO analysis of Department of Homeland Security (DHS) documentation. | GAO-23-106125

The JRC and components' requirements organizations lead the Need phase of the acquisition life cycle, which defines capability needs and identifies operational gaps in JRIMS documents. Specifically, Capability Analysis Reports and Mission Need Statements are validated by the JRC during the Need phase.

## JRC Validated Joint Capabilities Documents That Did Not Fully Meet Criteria

### JRC Designated and Validated Five Capabilities as Joint Since 2018

From September 2018 to December 2022, the JRC reviewed 46 Capability Analysis Reports submitted by DHS components and offices

into the JRIMS process.<sup>8</sup> Of those 46, the JRC designated and validated five capabilities as joint. Table 2 summarizes the five capabilities the JRC designated and validated as joint from September 2018 to December 2022 and their origin.

**Table 2: Capabilities Designated as Joint through the JRIMS Process from September 2018 to December 2022**

Joint capability description	Sponsors	Origin
<p><b>Counter-Unmanned Aircraft Systems</b> Pursues activities to counter unmanned aircraft systems (UAS) threats including preparing for events, deploying UAS, detecting and identifying UAS, and assessing threat levels, among others.</p>	<ul style="list-style-type: none"> <li>Federal Protective Service</li> <li>Transportation Security Administration</li> <li>U.S. Coast Guard</li> <li>U.S. Customs and Border Protection</li> </ul>	In 2018, a new law granted DHS authorities to mitigate credible UAS threats to covered facilities or assets. That same year, the Secretary of Homeland Security directed the JRC to assist components in documenting their Counter-UAS capability gaps, mission needs, and operational requirements. <sup>a</sup>
<p><b>DHS Tactical Intelligence, Surveillance, and Reconnaissance (ISR) Network</b> Improves upon existing DHS Tactical ISR Networks, which agencies use to share information by identifying options to acquire, disseminate, share, and protect sensor data from these networks with users.</p>	<ul style="list-style-type: none"> <li>U.S. Coast Guard</li> <li>U.S. Customs and Border Protection</li> <li>U.S. Immigration and Customs Enforcement</li> </ul>	<i>DHS's Strategic Plan for Fiscal Year 2020-2024</i> identified the need for an integrated intelligence network to eliminate redundancies and a mission-focused approach to producing and sharing intelligence. <sup>b</sup>
<p><b>Persistent Wide-Area Maritime Surveillance</b> Improves maritime domain awareness by allowing persistent surveillance and detection of vessels operating in U.S. territorial waters.</p>	<ul style="list-style-type: none"> <li>U.S. Coast Guard</li> <li>U.S. Customs and Border Protection</li> <li>U.S. Immigration and Customs Enforcement</li> </ul>	<i>The DHS Strategic Plan for Fiscal Year 2020-2024</i> directs components to improve situational awareness of the maritime domain. <sup>b</sup>
<p><b>Immigration Data Integration</b> Develops an immigration data system that integrates information across components by establishing department-wide standards to improve accessibility, timeliness, and interoperability.</p>	<ul style="list-style-type: none"> <li>DHS Office of Immigration Statistics</li> <li>DHS Office of the Chief Technology Officer</li> <li>U.S. Customs and Border Protection</li> </ul>	In 2016, the Secretary of Homeland Security directed the improvement of immigration data analysis and reporting and authorized DHS offices and components to develop an integrated immigration data warehouse.
<p><b>Enterprise Analytic Services and Processes</b> Seeks to improve enterprise analytic services and processes or the coordination of those services across the department.</p>	<ul style="list-style-type: none"> <li>DHS Office of Program Analysis and Evaluation</li> <li>DHS Science and Technology Directorate</li> </ul>	<i>The DHS Strategic Plan for Fiscal Year 2020-2024 and Resource Planning Guidance for Fiscal Years 2018-2022</i> directed changes to the departmental approach for analytically-informed decision-making so that DHS can take full advantage of its vast data resources to inform operational and investment decisions across missions. <sup>b,c</sup>

<sup>8</sup>The JRC previously designated and validated eight other capabilities as joint between April 2016 and September 2018, at which time it revised its JRIMS Instruction Manual. The JRC also designated the Next Generation Vertical Lift capability as joint but the Capability Analysis Report was undergoing review through the JRIMS process as of December 2022. See table 7 in appendix I for a full list of the 15 joint capabilities identified by the JRC since April 2016.

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Source: GAO review of Joint Requirements Integration and Management System (JRIMS) and Department of Homeland Security (DHS) documents. | GAO-23-106125

<sup>a</sup>Preventing Emerging Threats Act of 2018, Pub. L. No. 115-254, § 1602 (2018). The act is part of the Federal Aviation Administration Reauthorization Act of 2018.

<sup>b</sup>U.S. Department of Homeland Security, *The DHS Strategic Plan for Fiscal Years 2020-2024*, (Washington, DC: July 3, 2019).

<sup>c</sup>U.S. Department of Homeland Security, *The Resource Planning Guidance Fiscal Years 2018 – 2022*, (Washington, DC: 2015).

While these joint capabilities were directed by leadership or statute, the JRC also assisted the department with early development efforts in some of these areas. For example, in January 2018, the JRC established the Counter-Unmanned Aircraft System working group, which developed scenarios to inform proposed legislation and capability analyses. Later that same year, Congress granted DHS the authorities to mitigate unmanned aircraft threats.

Sponsors of the five joint capabilities are in the process of developing follow-on JRIMS documents to pursue materiel or non-materiel solutions to address their needs at both the joint and individual component level. The JRC may identify follow-on action items or recommend next steps when validating documents. But sponsoring components are ultimately responsible for developing and submitting JRIMS documents to document capability gaps, materiel and non-materiel solutions to address mission needs, concepts of operations, and operational requirements. Table 3 lists where each of the five joint capabilities are in the JRIMS process, including what JRIMS documents are underway.

**Table 3: Status of Joint Requirements Integration and Management System Documentation Submitted for the Validated Joint Capabilities as of December 2022**

Joint capability	Completed documents	In progress documents
Counter-Unmanned Aircraft Systems	Capability Analysis Report (CAR) completed Dec. 2019 Non-Materiel Change Recommendation completed Aug. 2021 Mission Need Statement completed Aug. 2021	Concept of Operations and Operational Requirements Documents <sup>a</sup>
DHS Tactical Intelligence, Surveillance, and Reconnaissance Network	CAR completed Dec. 2021	Mission Need Statement
Persistent Wide-Area Maritime Surveillance	CAR completed May 2022	Mission Need Statement
Immigration Data Integration	CAR completed Nov. 2020 Consolidated Operational Requirements Document completed Apr. 2021 <sup>b</sup>	—
Enterprise Analytic Services and Processes	CAR completed Jan. 2021 Mission Need Statement Completed Apr. 2021 Consolidated Operational Requirements Documents completed June 2021 and Aug. 2022 <sup>c</sup>	Non-Materiel Change Recommendation

Legend: — =No document in progress

Source: GAO review of Department of Homeland Security documents. | GAO-23-106125

<sup>a</sup>U.S. Customs and Border Protection is developing a Counter-Unmanned Aircraft Systems Concept of Operations and Operational Requirements Document in support of a single component materiel solution.

<sup>b</sup>U.S. Customs and Border Protection developed a separate Unified Immigration Portal Consolidated Operational Requirements Document, which merges a Mission Need Statement, Concept of Operations and Operational Requirements Document into one Joint Requirements Integration and Management System document and serves as a single component successor document to a Capability Analysis Report. This document traces to the capability gaps identified in the Immigration Data Integration Joint Capability Analysis Report.

<sup>c</sup>U.S. Immigration and Customs Enforcement developed an Investigative Data Analytics Mission Need Statement, Repository for Analytics in a Virtualized Environment (RAVE<sub>n</sub>) Consolidated Operational Requirements Document, and RAVE<sub>n</sub> Countering Transnational Organized Crime Consolidated Operational Requirements Document at the component level to pursue a materiel solution that addresses specific mission tasks identified in the joint Capability Analysis Report.

### JRC Validated Joint Capabilities Documents That Did Not Fully Meet Key Criteria Established in Guidance

Of the five joint Capability Analysis Reports that sponsors submitted into JRIMS since 2018, the JRC validated all five even though four did not fully meet key criteria established in the JRIMS Instruction Manual. In September 2018, the JRC revised the JRIMS Instruction Manual to specify the criteria that sponsors were required to meet for each submitted capability and requirements document before it is validated. This revision was made, in part, in response to a DHS Office of Inspector

General report, which found that the JRC validated capability documents that were not compliant with the JRIMS Instruction Manual. That report recommended that the JRC update its guidance manual to include all criteria it intends to hold components responsible for meeting.<sup>9</sup> Under the JRIMS process, JRC analysts are to review and assess each JRIMS document against the specified key criteria, among others, and record their results in a scorecard.

When the JRC initially evaluated all five draft Capability Analysis Reports, most did not meet or partially met all of the key criteria. For example, none of the five draft Capability Analysis Reports fully met the criterion to state and quantify capability gaps to demonstrate the significance of the gap and summarize the analysis used to make this determination. Quantifying capability gaps helps to assess the risk associated with not closing the gaps and provides the foundation for analysis that underpins all JRIMS documentation. The JRC reevaluated four of the five revised Capability Analysis Reports before validating them. While the scores improved, only the Persistent Wide-Area Maritime Surveillance Capability Analysis Report fully met the key criteria at the point of validation. See table 4 for a summary of how the JRC scored the five Capability Analysis Reports.

**Table 4: Summary of the Extent to Which Joint Capability Analysis Reports Met Key Criteria**

Capability name	Key criteria with final scores from the JRC Capability Analysis Report document:			
	States necessary capabilities for meeting mission	States current and planned capabilities for meeting mission	States and quantifies capability gaps and summarizes analysis used to make determination	Identifies risk to mission if gaps not resolved
Counter-Unmanned Aircraft Systems <sup>a</sup>	no final score provided	no final score provided	no final score provided	no final score provided
DHS Tactical Intelligence, Surveillance, and Reconnaissance Network	met	met	partially met	met
Persistent Wide-Area Maritime Surveillance	met	met	met	met
Immigration Data Integration	met	partially met	partially met	met
Enterprise Analytic Services and Processes	partially met	met	partially met	met

<sup>9</sup>Department of Homeland Security, Office of Inspector General, *DHS Needs to Improve the Process for Identifying Acquisition Planning Capability Needs*, OIG-19-19 (Washington, D.C.: January 2019).

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Legend: ● =Met ◐ =Partially Met ○ =Not Met - =No final score provided

Source: GAO review of Joint Requirements Council (JRC) documents. | GAO-23-106125

<sup>a</sup>JRC officials told us they did not re-evaluate the Counter-Unmanned Aerial Systems Capability Analysis Report because it was superseded by the development of successor Joint Requirements Integration and Management System documents.

Beyond the five joint Capability Analysis Reports we reviewed, the JRC previously reported in its quarterly lessons learned briefs that components were consistently not meeting the key criteria specified for each type of JRIMS document. For example, in March 2020, the JRC identified that addressing criteria insufficiently was the most prevalent issue affecting 14 of the 17 (or 82 percent) JRIMS documents reviewed in the second quarter of fiscal year 2020.

According to the JRIMS Instruction Manual, the key criteria must be met in order for a JRIMS document to receive a recommendation for validation. However, JRC officials said the JRIMS criteria is a guide, not a requirement, and they can apply discretion when reviewing and validating joint capabilities even if the supporting JRIMS documents do not fully meet key criteria. JRC officials recognized that the Capability Analysis Report is the foundation for developing successor JRIMS documents. However, they said this flexibility of validating without meeting criteria is important to ensure documents are reviewed in a timely manner to meet department and user needs in the field more quickly. Further, JRC officials stated they were moving documents forward that may not fully meet JRIMS criteria to maintain components' participation in the process. JRC officials also told us they have validated every JRIMS document submitted for their review.

The process of assessing capability gaps is intended to help to strengthen acquisition programs in the future by ensuring the associated requirements are feasible, cost-informed, and linked to DHS's strategic guidance. Components use JRC-validated capability gaps to develop operational requirements that define how a materiel solution will meet mission needs. We previously found that DHS has experienced challenges with developing and defining operational requirements. In April 2017, we reported that one reason major acquisition programs did not achieve some of their key operational requirements was that programs

poorly defined them.<sup>10</sup> Poorly defined requirements can increase the risk that end users—such as border patrol agents or first responders in a disaster—receive capabilities that do not meet their missions. We also found in August 2018 that some components did not meet leading practices for developing operational requirements, including establishing a process for developing and managing requirements to ensure that requirements are identified, reviewed, and controlled.<sup>11</sup>

Through the JRIMS process, the JRC reviews and validates joint capabilities and associated capability gaps and requirements. The validation process confirms that the capability gaps and resulting requirements are traceable, feasible, and cost-informed. However, the JRC is not holding components and their capability documents to the criteria established in DHS guidance, and has validated and endorsed joint capability documents that did not meet key criteria in the scorecard. By ensuring that joint capabilities documents meet JRIMS criteria, the JRC can improve the likelihood that future requirements stemming from these gaps are well-defined. This could also help components develop better operational requirements to effectively meet their missions.

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## JRC Has Not Implemented a Process to Help Inform Investment Decisions

The JRC has not implemented a process to help inform investment decisions as established in DHS policy. Specifically, the JRC is to lead an annual assessment—separate from the JRIMS process—that integrates input from across the department to prioritize both emerging capability gaps and existing program requirements. The purpose of the annual

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<sup>10</sup>GAO, *Homeland Security Acquisitions: Earlier Requirements Definition and Clear Documentation of Key Decisions Could Facilitate Ongoing Progress*, [GAO-17-346SP](#) (Washington, D.C.: April 6, 2017). We recommended, among other things, that DHS require that major acquisition programs' technical requirements be well-defined and conduct key technical reviews prior to approving programs to initiate product development, in accordance with acquisition best practices. DHS concurred with and implemented our recommendation.

<sup>11</sup>GAO, *DHS Acquisitions: Additional Practices Could Help Components Better Develop Operational Requirements*, [GAO-18-550](#), (Washington, D.C.: Aug. 8, 2018). We made 25 recommendations to DHS—including to individual components—to establish policies and independent organizations for requirements development, assess workforce needs, and establish training and certifications. DHS concurred with all the recommendations and has implemented most of them.

assessment is to provide recommendations to the DMAG for consideration in budget decision making.

In October 2016, we reported that the JRC had started to develop a pilot process known as the Joint Assessment of Requirements to evaluate and prioritize both emerging capability gaps and existing requirements against criteria considerations, with the goal of identifying areas where DHS can reduce unnecessary duplication, overlap, and redundancy.<sup>12</sup> As part of this process, the JRC was to provide rigorous analysis to the DMAG to inform trade-off discussions and determine which programs to fund, delay, or not pursue. More specifically, the JRC was to assess both capability gaps and requirements to ensure existing or planned acquisition programs will meet the mission needs identified in the validated operational requirements developed in support of these programs. While the JRC was responsible for leading the assessment, other DHS offices had central roles in assisting the JRC with this process. For example, the Office of the Chief Financial Officer was to determine the cost and affordability of current and potential requirements and the Office of Program Accountability and Risk Management was to assess the viability of current requirements in terms of cost, schedule, and performance. The JRC planned to implement the process incrementally over 3 years with the goal of assessing all emerging capability gaps and existing requirements for all major and some non-major acquisition programs by fiscal year 2018.<sup>13</sup>

After initial implementation of the Joint Assessment of Requirements pilot, JRC officials said they decided in 2017 that the best use of the JRC going forward was to focus solely on prioritizing emerging capabilities gaps since this is the part of the acquisition life cycle where the JRC is most involved. Moreover, these same officials indicated that DHS leadership approved the decision to focus just on emerging capability gaps instead of both emerging capabilities and existing requirements in 2019. Despite this shift in focus, the responsibility to assess existing requirements within

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<sup>12</sup>[GAO-17-171](#).

<sup>13</sup>DHS defines major acquisition programs as those with life-cycle cost estimates of \$300 million or more. DHS defines non-major acquisition programs as those with life-cycle cost estimates greater than \$50 million and less than \$300 million. In some cases, DHS may define a program with a life-cycle cost estimate less than \$300 million a major acquisition if it has significant strategic or policy implications for homeland security, among other things.



the Joint Assessment of Requirements process continues to be included in the JRC's operational policies.

JRC officials also told us they do not have the authority to prioritize existing requirements for ongoing acquisition programs as these are overseen by other offices and processes within the department. However, in DHS's acquisition management policy, the JRC is responsible for overseeing requirements development, including any changes made to operational requirements, throughout the life cycle of an acquisition program. Further, DHS leadership also told us that JRC inputs into specific program requirements are essential to ensuring that properly validated requirements set the foundation for acquisition of critical capabilities.

In 2018, JRC officials said they transitioned from the Joint Assessment of Requirements pilot to implement the Capability Gap Register and focus on solely prioritizing emerging capability gaps. The Capability Gap Register was based on capability gap information derived from various JRIMS documents, including Capability Analysis Study Plans, Capability Analysis Reports, and Mission Need Statements. JRC staff were responsible for compiling, updating, and analyzing the Capability Gap Register data. On a quarterly basis, the JRC sent the Capability Gap Register to components to ensure its accuracy and also to ask them to identify their priority emerging capability gaps. The JRC used the components' inputs and Capability Gap Register data to produce an Annual Top Gap Areas with Commonality that lists the most common and joint capability gaps. According to JRC officials, they used the Top Gap Areas along with the Capability Gap Register to inform the department's strategic issue teams that are responsible for reviewing component-specific resource requests during the annual budget process and making recommendations to the DMAG. As of December 2021, the JRC identified six categories of Top Gap Areas with Commonality:

- Biological Agent Detection,
- Biometrics,
- Communication Infrastructure,
- Counter-Unmanned Aircraft Systems,
- Document and Media Exploitation, and
- Information Sharing Environments.

JRC officials stated they used the list of Top Gap Areas with Commonality to initiate further analyses in specific areas on an as needed basis. For example, the JRC stood up a Biometrics portfolio team in 2021 to analyze the current and future states for biometrics data collection and management as well as identify and recommend joint solution approaches to leverage commonalities. The team provided the JRC with several courses of action, including leveraging an existing DHS biometrics executive steering committee to drive coordination among components and offices, and managing resources and acquisitions in pursuit of biometric solutions.

The JRC also used the Capability Gap Register to assess the department's final budget decisions for components' changes to existing program requirements, identify instances where funding decisions did or did not align with documented capability gaps, and identify opportunities for collaboration and coordination.<sup>14</sup> For example, in December 2021, the JRC's analysis found that about half of the capability gaps in the Capability Gap Register aligned with program changes in the final budget decisions. However, the results of this analysis were not briefed to the DMAG because the JRC's analysis did not become a DMAG briefing topic.

We found that the Capability Gap Register was not a sufficient substitute for meeting the JRC's responsibility as established in DHS policy to inform investment decisions. Without a process like the Joint Assessment of Requirements, which included both emerging capability gaps and existing requirements, the JRC and components may have difficulty in identifying duplication or overlap of efforts between them. The exclusion of the existing requirements also meant that the Top Gap Areas of Commonality was not considering components' existing requirement priorities alongside emerging capability gap priorities when the list was shared with DHS's Office of Program Analysis and Evaluation to inform budget decisions. Additionally, the Top Gap Areas of Commonality produced from the Capability Gap Register was a single list without

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<sup>14</sup>Interagency collaboration involves collaboration or coordination between two or more federal entities, or within components of the same entity. Collaboration can be broadly defined as any joint activity that is intended to produce more public value than could be produced when the entities act alone. We previously identified eight leading practices for interagency collaboration, including key considerations for collaborating entities to use when implementing them. See GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

further prioritization or recommendations to assist the DMAG in determining which programs to fund, delay, or not pursue. Finally, the JRC's Capability Gap Register has been paused since December 2021 due to workforce challenges, including ending the contractor support that previously assisted with developing the register, among other analytic efforts.<sup>15</sup>

DHS leadership confirmed that the JRC did not implement a process to prioritize both capability gaps and existing requirements to inform investment decisions as directed in DHS policy. According to DHS leadership officials, the JRC decided to transition from the Joint Assessment of Requirements to the Capability Gap Register process to determine whether different analysis might provide greater insight. However, as of July 2022, DHS leadership was considering standing down the Capability Gap Register entirely in the future, stating that while it is a nice-to-have product, it does not materially impact future year planning.

Yet, DHS established the JRC to assist the department with developing recommendations for investment and to better inform the budget and the acquisition review processes, among other responsibilities. In addition, DHS officials previously reported that the JRC is the only entity in the department that conducts a top-down assessment of joint requirements while also communicating those requirements across the enterprise. We previously reported that sustained management attention to implementing the Joint Assessment of Requirements process was important to keeping the momentum going so that the JRC's insights can inform the department's budget priorities by identifying areas where DHS can reduce unnecessary duplication and prioritizing requirements on an annual basis.<sup>16</sup> Without such a process, the department will be limited in its ability to provide recommendations to enable leadership to fully consider tradeoffs between addressing emerging capability gaps versus validated requirements that may be further along in the acquisition life cycle and reduce potential duplication and overlap, and ultimately use its finite resources wisely.

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<sup>15</sup>Between 2017 and 2022, the JRC used a DHS service contract with RAND's Homeland Security Operations Analysis Center, a Federally Funded Research and Development Center, to support JRC's analysis staff.

<sup>16</sup>[GAO-17-171](#).

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## DHS Leadership Is Not Regularly Engaging with the JRC or Reviewing Joint Capability Documents

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### DHS Leadership Is Not Regularly Meeting with JRC

The JRC is intended to be a recommending body to DHS leadership through the DMAG but this group is not regularly meeting with the JRC. We previously reported that the JRC had been regularly engaging with the DMAG after it was re-established in 2014. Additionally we found that the JRC was advising the Acquisition Review Boards on capability gaps and requirements.<sup>17</sup> While the JRC continues to participate in Acquisition Review Boards, DHS leadership officials stated that the DMAG has not met with the JRC since 2015.

According to these DHS leadership officials, they found that the JRC was functioning effectively as the facilitator of the JRIMS process and did not need additional direction or guidance from the DMAG. However, JRC officials told us they have made multiple attempts to engage with the DMAG and receive guidance and direction in return, but certain factors, such as the DMAG's inactivity between April 2019 and June 2021, have affected their ability to do so. Further, JRC officials said that without leadership engagement it is hard to identify the next steps for joint capabilities identified through the JRIMS process. For example, the JRC identified Counter-Unmanned Aircraft Systems as a joint capability, and officials said they recommended the department pursue a materiel solution to address this common need. However, JRC officials said they have not yet received any guidance or direction from the DMAG on how to proceed with this recommendation. According to JRC officials, acquisition decision strategies have to be implemented in order for these joint opportunities to be successful.

According to the charter establishing the JRC, the JRC is to be a recommending body to the DMAG and the DMAG is to provide direction and guidance to the JRC, review JRC's recommendations, and approve and/or direct related follow-on activities. DHS officials stated that DMAG engagement and advocacy is critical for the JRC's success but is currently missing. Without implementing a process that enables the JRC

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<sup>17</sup>[GAO-17-171](#).

to regularly engage with leadership—specifically the DMAG—the department may be missing opportunities to fully realize the JRC’s strategic value to identify opportunities for joint solutions and help the department use its resources efficiently.

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### DHS Leadership Has Not Reviewed Joint Capability Documents Designated for Its Attention

Four of the five joint capabilities designated between September 2018 and December 2022 were also identified by the JRC to be DMAG Interest items, but the DMAG was not involved in the designation or validation of these documents or any of the other 28 Capability Analysis Reports designated as such.<sup>18</sup> Specifically, the JRC designated the Capability Analysis Reports for Counter-Unmanned Aircraft Systems; Immigration Data Integration; Persistent Wide-Area Maritime Surveillance; and DHS Tactical Intelligence, Surveillance, and Reconnaissance Network as both joint and DMAG Interest.

According to DHS policies, the DMAG is to review JRC validated capability gaps and requirements, and endorses or directs related follow-on JRC activities. Additionally, the JRC is to forward validated JRIMS documents designated as DMAG Interest to the DMAG, as necessary, as the final endorsing authority. However, we found that neither is occurring. JRC officials said they have not shared any JRIMS documents designated as DMAG Interest with leadership for validation to date because they have not briefed the DMAG since 2015 and the DMAG has not asked the JRC for this information. DHS leadership officials confirmed that the JRC has never used the DMAG in this capacity and also told us they had no records of any JRIMS DMAG Interest material.

DHS officials stated that the JRIMS process is a bottom-up and component led approach that does not drive jointness without active direction from senior leadership. The JRC has taken steps to engage the DMAG by designating documents for its attention as part of the JRIMS process. However, to date, the lack of involvement from the DMAG in the JRIMS review process limits leadership’s ability to ensure validated joint capabilities align with DHS priorities. Also, without DMAG participation in

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<sup>18</sup>Between September 2018 and December 2022, the JRC validated 46 Capability Analysis Reports of which 28 were designated as DMAG Interest. This number includes seven single component, 17 single component joint interest, and four joint interest documents.

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the JRIMS process, opportunities may be missed to ensure that DHS leadership considerations are formally reflected in joint capabilities.

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## Proposed JRC Organizational Realignment Limits Its Independence and Current Workforce Is Unable to Fully Conduct Responsibilities

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### DHS's Planned Realignment of the JRC Limits Independence and Does Not Support Its Mission

DHS has proposed realigning the JRC from the Office of the Secretary to the Office of the Chief Readiness Support Officer. However, we found that this realignment could limit the JRC's ability to function as an independent requirements organization and does not support the JRC's current mission.

Our prior work found that having a separate and independent requirements organization is critical to addressing capability gaps.<sup>19</sup> According to federal standards for internal controls, independent lines of authority should exist. These standards state that management should design control activities to achieve objectives and respond to risks.<sup>20</sup> In addition, authorities should segregate incompatible duties to prevent risks such as management override. For example, we previously reported that if requirements developers were part of the acquisition function, management could tailor operational requirements to satisfy preferred acquisition outcomes, increasing the risk that capability gaps will not be addressed. In accordance with these standards, DHS, at the department level, has separate requirements, acquisitions, and resourcing organizations—each with its own governance structure.

DHS also recognized the importance of maintaining an independent requirements organization by including it as a factor when evaluating potential placements for the JRC's realignment. Specifically, DHS

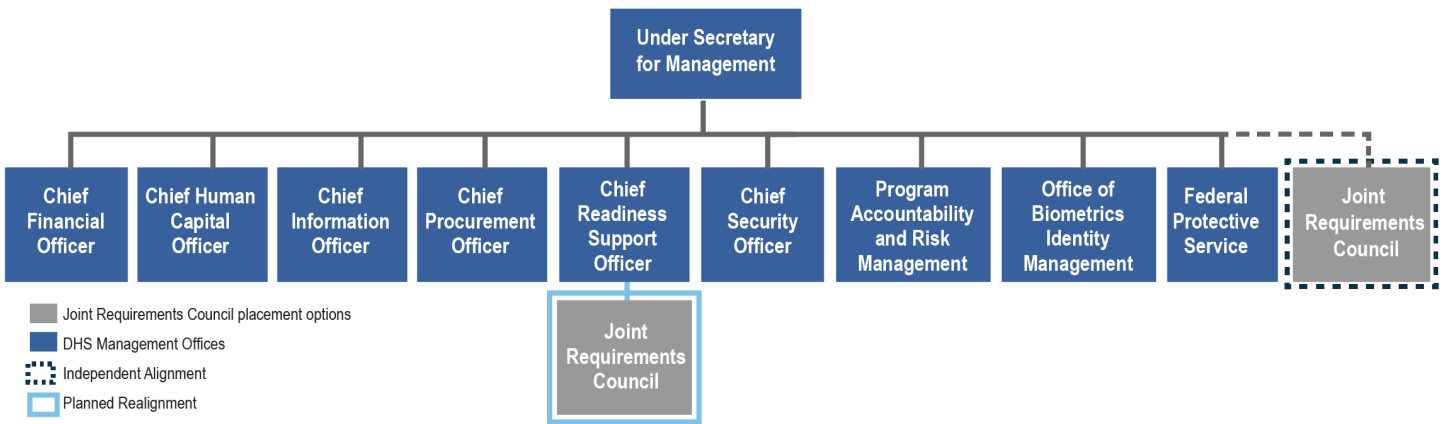
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<sup>19</sup>[GAO-18-550](#).

<sup>20</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

excluded the Office of Program Accountability and Risk Management from consideration for the JRC's realignment to maintain independence between acquisitions and requirements development. This is consistent with best practices, which emphasize the importance of this separation to guard against possible bias by acquisition officials toward a specific materiel solution.<sup>21</sup> However, the department's decision to realign the JRC to the Office of the Chief Readiness Support officer hinders the JRC's ability to independently oversee the requirements development process and fulfill its current capability gaps because it will report to the Chief Readiness Support Officer instead of being a separate function, consistent with other management areas like procurement or IT. Alternatively, realignment to report directly to the Office of the Under Secretary for Management provides the JRC with more opportunities to better fulfill its delegated roles and responsibilities, while also maintaining a level of independence consistent with the management functions across the department. Figure 5 provides an overview how the Management Directorate is organized, including how DHS's planned realignment of the JRC to the Office of the Chief Readiness Support Officer limits its ability to be independent like the other management offices.

**Figure 5: Organizational Structure of DHS's Management Directorate and the Joint Requirements Council Realignment**



Source: GAO analysis of Department of Homeland Security (DHS) documentation. | GAO-23-106125

In addition to limiting the JRC's independence, we also found that Office of the Chief Readiness Support Office was the least positioned

<sup>21</sup>GAO, *Best Practices: Setting Requirements Differently Could Reduce Weapon Systems' Total Ownership Costs*, GAO-03-57 (Washington, D.C.: Feb.11, 2003).

management office to support the JRC in executing its key roles and responsibilities compared to the other offices considered by DHS. When DHS re-established the JRC in 2014, it placed the office under the Office of the Secretary. According to its founding charter, the JRC is to report to the DHS Chief of Staff but JRC officials said that, in practice, they have been regularly reporting to the Deputy Secretary. In July 2022, however, the Deputy Secretary requested that the JRC be moved to the Management Directorate. According to the Deputy Secretary, the Management Directorate is responsible for overseeing the acquisition life cycle and is better suited to integrate the JRC and JRIMS into existing acquisition oversight efforts. The Deputy Secretary directed a team consisting of various Management Directorate offices to conduct an internal study to identify placement options for the JRC. This study team evaluated the Offices of the Chief: Financial Officer, Information Officer, Procurement Officer, and Readiness Support Officer, and the Under Secretary for Management as potential placements. See table 5 for a summary of each of these offices' responsibilities.

**Table 5: Summary of Select DHS Management Offices' Responsibilities**

Office of:	Responsibilities:
Chief Financial Officer	Provides financial information to decision makers and stakeholders; develops program plans and budgets; and provides financial management services and operations.
Chief Information Officer	Provides IT services to prevent and deter terrorist attacks and protect against and respond to threats and hazards and implements programs to align DHS's IT personnel, resources, and assets to support department-wide missions and activities.
Chief Procurement Officer	Responsible for the overall management, administration, and oversight of department-wide acquisition, financial assistance, strategic sourcing and competitive sourcing programs.
Chief Readiness Support Officer	Responsible for the overall leadership, internal controls and oversight of department-wide asset life-cycle management and provides support products and services that enable employees across DHS the ability to perform the missions of the department effectively.
Under Secretary for Management	Provides leadership and oversight for all departmental management lines of business including IT, security, budget and financial management, procurement and acquisition, human capital, biometric identity management, and administrative services, as well as the law enforcement mission of the Federal Protective Service.

Source: GAO review of Department of Homeland Security (DHS) documents. | GAO-23-106125

The study, which was completed in October 2022, assessed the alignment between the mission of the JRC and those of the specific management offices by comparing the JRC's delegated roles and responsibilities in its founding charter and policies to each management office's existing responsibilities. The study also assessed each management office's ability to address (1) the JRC's current capability gaps, including leading an annual assessment prioritizing emerging and existing requirements and providing the DMAG with investment



recommendations for decision making, and (2) the qualities needed to strengthen the JRC, including access to components and maintaining the JRC's independence, among others.

The study identified the Office of the Under Secretary for Management as the preferred location for the JRC. However, the Office of the Secretary determined that the JRC would report to the Office of the Chief Readiness Support Officer, which scored the second lowest among the five offices analyzed in the department's study. According to DHS's Office of the Secretary's fiscal year 2024 budget request, moving the JRC to the Office of the Chief Readiness Support Officer would result in increased efficiencies for the department. We asked DHS leadership officials to explain what efficiencies were gained and to provide any additional rationale for this decision. Officials from the JRC and Office of the Chief Readiness Support Officer, among others, provided a coordinated response indicating that the move or realignment would strengthen the requirements definition and management within the department by bringing the JRC organizationally closer to offices key to both non-materiel solutions and the acquisition life-cycle framework. However, this response does not provide the rationale for efficiencies gained or why the Chief Readiness Support Officer was selected over the other offices considered.

We also independently analyzed each management office's current responsibilities as established in DHS policies against those of the JRC's to determine the extent to which each office was positioned to support the JRC in executing its mission. Consistent with DHS's study, we found that of the five placements considered for the JRC's relocation, the Office of the Under Secretary for Management was best positioned to support the JRC because it had the most current responsibilities directly related to those of the JRC. We also found the Office of Chief Readiness Support Officer had the fewest responsibilities that aligned with the JRC's mission and key responsibilities, as shown in Table 6.

**Table 6: GAO Assessment of Alignment between the Joint Requirements Council and DHS Management Directorate Offices' Current Responsibilities**

JRC responsibilities	Responsibilities of the Office of the:				
	Chief Financial Officer	Chief Information Officer	Chief Procurement Officer	Chief Readiness Support Officer	Under Secretary for Management
Oversee Joint Requirements Integration and Management System (JRIMS) execution and provide leadership with materiel and non-materiel recommendations for capability development	responsibilities aligned	responsibilities partially aligned	responsibilities did not align	responsibilities did not align	responsibilities aligned
Oversee and manage the department's process to generate, validate and prioritize capability needs through the establishment and management of functionally-aligned portfolio structures	responsibilities aligned	responsibilities aligned	responsibilities did not align	responsibilities did not align	responsibilities aligned
Mandate joint development of JRIMS documents when appropriate as well as prioritization of joint requirements	responsibilities aligned	responsibilities aligned	responsibilities did not align	responsibilities did not align	responsibilities aligned
Lead an annual DHS requirements assessment prioritizing emerging capability gaps and existing requirements and provide recommendations to leadership for consideration in budget decision-making	responsibilities aligned	responsibilities partially aligned	responsibilities did not align	responsibilities did not align	responsibilities aligned
Advise the Acquisition Review Board on capability gaps, needs and requirements that are the catalyst for investment decisions	responsibilities aligned	responsibilities aligned	responsibilities aligned	responsibilities aligned	responsibilities aligned
Periodically assess the JRIMS process and procedures to ensure continued relevancy	responsibilities aligned	responsibilities aligned	responsibilities did not align	responsibilities did not align	responsibilities aligned
Provide JRIMS training and education	responsibilities did not align	responsibilities did not align	responsibilities aligned	responsibilities did not align	responsibilities aligned

Legend: ● =Responsibilities Aligned ◐ =Responsibilities Partially Aligned ○ =Responsibilities Did Not Align

Source: GAO analysis of Department of Homeland Security (DHS) policies. | GAO-23-106125

For example, we found that the Office of the Chief Readiness Support Officer is not well-positioned to assist the JRC in addressing the capability gaps as identified by DHS because it is not currently a principal member of the JRC and is not involved in the JRIMS process. Additionally, the Office of the Chief Readiness Support Officer is not currently one of the management offices designated to assist the JRC with its annual assessment of emerging and existing requirements to provide budget recommendations to leadership. As a result, this move could limit the

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JRC's ability to fully execute its current roles and responsibilities. Alternatively, the Office of the Under Secretary for Management has related responsibilities that align with all of the JRC's key responsibilities we assessed.

According to DHS's study, moving the JRC from the Office of the Secretary to the Management Directorate may bring opportunities to address current JRC needs and challenges. However, placing the JRC under existing management offices instead of establishing it as a separate management function under the Office of the Under Secretary for Management limits its ability to function independently and fully execute its key roles and responsibilities.

Reconsidering the placement of the JRC within the Management Directorate can help ensure that the JRC is able to fully conduct its mission and assist the department in meeting its objective to build a more unified and operationally effective and efficient organization, which was the department's goal in re-establishing the JRC in 2014.

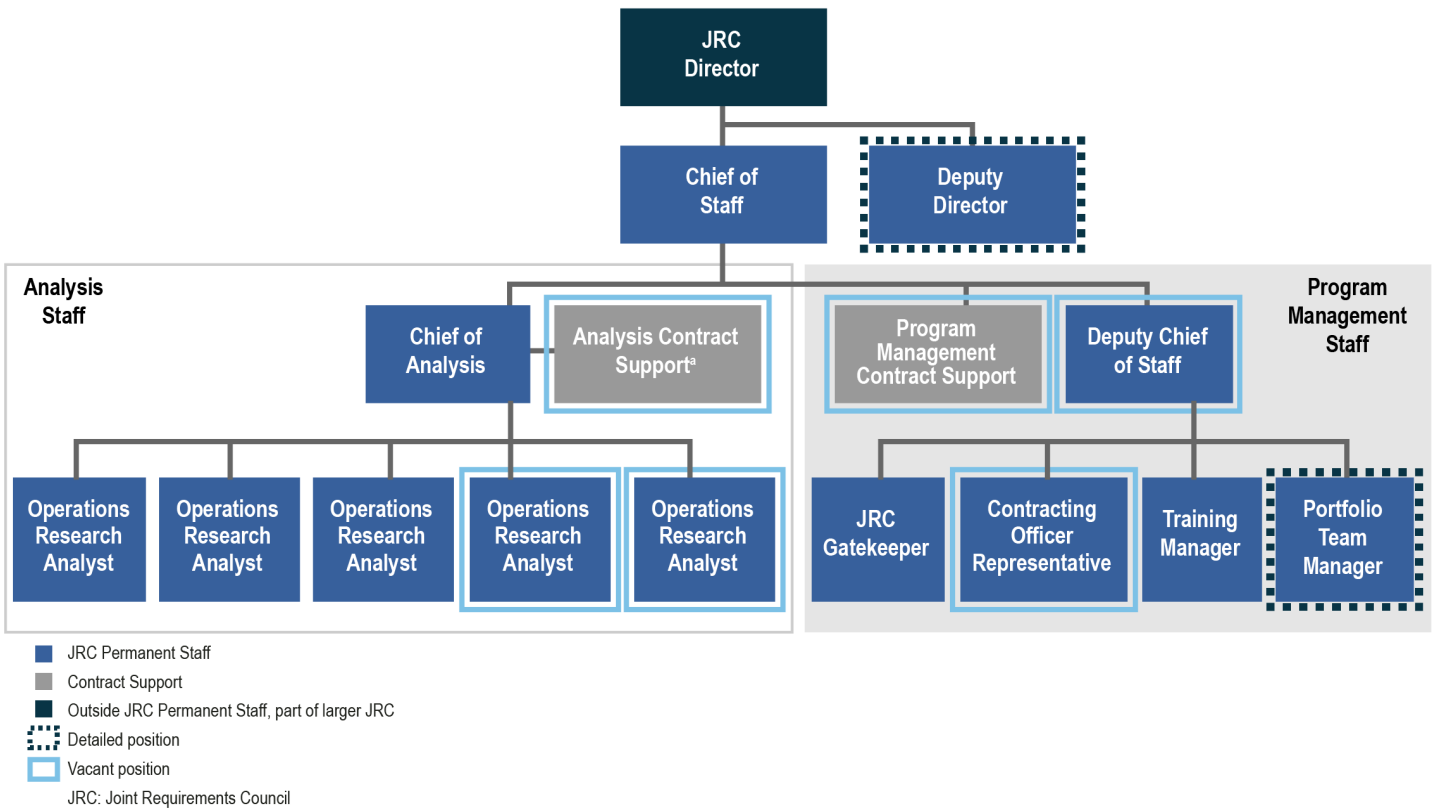
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## JRC's Current Workforce Is Unable to Fully Conduct Responsibilities

The JRC has been limited in its ability to fulfill its responsibilities outside of JRIMS execution due in part to workforce challenges, but DHS has not conducted an assessment to determine the appropriate number and mix of staff needed.

Over the last several years, JRC staffing, including support provided by contractor personnel, has been reduced to the point that the office, according to JRC officials, has only been able to fulfill select functions and is unable to execute many of their responsibilities outside of reviewing JRIMS documents. Previously, the JRC had 13 full-time equivalent positions and officials said the JRC was supported by 12 contractor personnel providing program management and analysis support services. JRC officials said that in recent years, DHS removed three full-time positions, which required staff to assume multiple roles outside their descriptions. JRC officials told us this has resulted in duties being executed to a lesser degree and responsiveness. See figure 6 for an overview of the JRC's workforce, including which positions are vacant or being filled with detailed staff as of fiscal year 2022.

**Figure 6: Overview of the Joint Requirements Council (JRC) Workforce as of Fiscal Year 2022**



Source: GAO analysis of Department of Homeland Security documentation. | GAO-23-106125

<sup>a</sup>Support provided by a Federally Funded Research and Development Center.

Further, JRC officials told us that DHS implemented a hiring freeze and reduced the office’s budget to cover the salaries of currently filled positions and essential services for fiscal year 2023. Additionally, JRC officials said their contracts for analysis and program management support were not renewed due to the JRC’s current funding constraints. According to JRC officials, the funding constraints have also limited their ability to facilitate knowledge-sharing across the department, because they have not been able to obtain additional licenses for components to access their JRIMS document management system to identify

opportunities for collaboration or to leverage existing efforts to minimize duplication, overlap, or fragmentation.<sup>22</sup>

According to DHS leadership officials, the hiring freeze was implemented to prioritize funding for critical departmental efforts and to evaluate where the JRC should be placed within the Management Directorate. Officials said proposals for funding and staffing levels of the JRC will be restored in future years, as appropriate, once the JRC transitions from the Office of the Secretary to the Office of the Chief Readiness Support Officer. The department's budget submission for fiscal year 2024 provides \$3 million to support the transfer of the JRC to the Office of the Chief Readiness Support Officer. Of the \$3 million, \$1.7 million is proposed to fund 11 full-time equivalent positions and \$1.3 million is proposed for program funding. This is a decrease from previous years when the department received approximately \$4.8 million for JRC operations, including salaries and contracts, from fiscal years 2019 through 2021.

As a result of the staffing and funding challenges, JRC officials told us that they are unable to engage in tasks outside of JRIMS execution. For example, JRC officials said they were unable to conduct outreach to components and DHS offices to proactively identify common needs and promote joint collaboration. Officials also said that they were not able to review and make improvements to policy and cannot accommodate requests for JRIMS training.

In 2018, the JRC commissioned the RAND Corporation to conduct a review of the JRC's operations. RAND found that the JRC faced significant staffing challenges such as having a sufficient number of staff to execute all of their delegated responsibilities. RAND recommended that DHS further analyze and consider an increase in JRC staffing above its previously approved 13 staff and contractor support by adding at least seven full-time equivalent positions to accommodate workload across JRIMS mission areas.<sup>23</sup> DHS leadership officials said they took the RAND study and resulting workforce recommendation into consideration for

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<sup>22</sup>The JRC uses the Knowledge Management/Decision Support (KMDS) tool to facilitate the processing, coordination, tasking, and archiving of documents for the JRIMS process. KMDS collects key information on the document, sponsor, and subject matter to allow users to perform advanced searches for similar requirements existing within the system. This visibility helps to inform new submissions and encourage collaboration when efforts are similar across components.

<sup>23</sup>RAND Corporation, *An Assessment of the Joint Requirements Council's (JRC) Organization and Staffing*, [RR-2473-DHS](#) (2018).

action. However, as of December 2022, DHS has not yet assessed JRC's workforce to determine whether it has the right mix of staff and skillsets to meet its responsibilities. DHS leadership officials said they are planning to assess the JRC's workforce and resourcing needs once the JRC office move is finalized.

Strategic workforce planning helps an organization align its human capital with its current and emerging mission and programmatic goals. Key principles include determining the critical skills and number of employees needed to achieve programmatic results; and identifying and developing strategies to address staffing and skills gaps.<sup>24</sup> Additionally, our prior work has found that strategic workforce planning should precede any staff realignments or downsizing, so that changed staff levels do not inadvertently produce skills gaps or other adverse effects.<sup>25</sup> By assessing JRC's workforce needs prior to relocating the JRC, DHS can help ensure that the JRC has the appropriate number and mix of staff with the necessary skills to fulfill the full scope of its delegated and oversight responsibilities.

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## Conclusions

The JRC has taken steps to improve its process for designating and validating joint capabilities. However, the JRC and the department can take additional steps to improve requirements oversight. Ensuring the JRC validates only those JRIMS documents that fully meet specified criteria increases the likelihood that future capabilities and requirements stemming from these documents will be well defined, the absence of which has been a recurring challenge for the department.

Further, the JRC is responsible for overseeing emerging capability gaps and existing requirements to identify cross-component needs and develop recommendations for investment to enhance operational effectiveness and inform the department's budget and acquisition processes. However, the JRC has not implemented a process that identifies both priority capability gaps and existing requirements and informs investment decisions. Until the JRC implements a process that assesses and

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<sup>24</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003).

<sup>25</sup>GAO, *Government Reorganization: Key Questions to Assess Agency Reform Efforts*, [GAO-18-427](#) (Washington, D.C.: June 13, 2018).

prioritizes emerging capability gaps and existing requirements to make recommendations to leadership for investment trade-offs, DHS leadership may not be able to reduce duplication and overlap, and ultimately use its finite resources wisely.

DHS senior leadership directed the creation of the JRC in 2014 to serve as a recommending body to the DMAG. However, the DMAG has not consistently engaged with the JRC to review its recommendations and provide guidance and direction in return. In addition, having active DMAG participation in the JRIMS process, especially for those documents designated for its attention, will improve leadership's ability to ensure validated joint capability documents align with DHS priorities.

Finally, the department has a history of not ensuring that the JRC effectively carried out its responsibilities, resulting in part, in its initial dissolution in 2006. While the department has taken positive steps to re-establish the JRC and implement policies and oversight mechanisms, the JRC's proposed realignment to the Office of the Chief Readiness Support Officer will likely further hamper its ability to fully carry out its mission beyond those responsibilities it is already not executing due to current workforce challenges. Until DHS ensures the JRC is properly aligned, sufficiently independent, and has the number and mix of staff needed to fulfill its responsibilities, there is a risk that the department will not realize the benefits of the JRC.

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## Recommendations for Executive Action

We are making six recommendations to DHS:

The Secretary of Homeland Security should ensure that the JRC validates those joint capability and requirements documents that fully meet key criteria. (Recommendation 1)

The Secretary of Homeland Security should ensure that the JRC, in coordination with stakeholders, (1) implements an assessment process that prioritizes emerging capability gaps and existing requirements annually, and (2) submits these priorities to leadership for consideration in investment decisions. (Recommendation 2)

The Secretary of Homeland Security should ensure that the Deputy's Management Action Group (DMAG) establishes a process to regularly engage with the JRC to review the JRC's recommendations, approve

and/or direct related follow-on activities, and provide direction and guidance to the JRC. (Recommendation 3)

The Secretary of Homeland Security should ensure that the Deputy's Management Action Group (DMAG), in coordination with the JRC participates in the Joint Requirements Integration and Management System process, by reviewing and validating all designated documents determined to be DMAG Interest by the JRC. (Recommendation 4)

The Secretary of Homeland Security should ensure that the Deputy Secretary, prior to finalizing the realignment of the JRC, reconsiders the placement of the JRC within the Management Directorate to ensure it fully aligns with the JRC's mission and maintains the JRC's independence. (Recommendation 5)

The Secretary of Homeland Security should ensure that the Deputy Secretary, prior to the realignment of the JRC, assesses the JRC's workforce to ascertain the extent to which it has the appropriate number and mix of staff with the necessary skills to fulfill its responsibilities. (Recommendation 6)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided written comments, which we reproduced in appendix II. DHS also provided technical comments, which we incorporated as appropriate. In its written comments, DHS concurred with all six recommendations. In its response, DHS identified actions it plans to take to address these recommendations. However, DHS identified actions it plans to take for two recommendations that do not meet the intent of those recommendations.

Specifically, we recommended that DHS reconsider the placement of the JRC within the Management Directorate to ensure it fully aligns with the JRC's mission and maintains independence prior to finalizing the realignment of the JRC (recommendation 5). In its comments, DHS agreed that the JRC's placement should fully align with its mission and its need to maintain independence. However, in its letter the department stated that it will further assess the JRC's roles and responsibilities to determine the most effective organizational alignment upon transitioning the JRC to the Office of the Chief Readiness Support Officer.



We also recommended that DHS assess the JRC's workforce to ascertain the extent to which it has the appropriate number and mix of staff with the necessary skills to fulfill its responsibilities prior to the realignment of the JRC (recommendation 6). In its comments, DHS recognized the importance of sufficiently resourcing the JRC to include a mix of staff with appropriate skillsets. However, the department stated in its letter that it does not plan to ensure that the JRC has the resources needed to fulfill its mission until after it is transitioned to the Office of the Chief Readiness Support Officer.

Proceeding with the decision to move the JRC to the Office of the Chief Readiness Support Officer prior to determining the most effective organizational alignment for the JRC will likely limit its ability to independently oversee requirements development and fully execute its roles and responsibilities. As we discuss in the report, our analysis found that the Office of the Chief Readiness Support Officer was not well-positioned to support the JRC because it had the fewest responsibilities in the Management Directorate that aligned the JRC's mission. We also stated that this realignment could limit the JRC's independence because it will not be a separate management function. Additionally, realigning the JRC before determining that it has the sufficient resources needed to fulfill its mission may further limit the JRC's effectiveness. As we indicated in our report, strategic workforce planning should precede any staff realignments or downsizing, so that changed staff levels do not inadvertently produce skills gaps or other adverse effects. Therefore, we continue to believe that reconsidering the placement of the JRC and assessing its workforce prior to that realignment would better position DHS to fully realize the benefits of the JRC and meet its objective to build a more unified and operationally effective and efficient organization.

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

If you or your staff have any questions about this report, please contact me at (202) 512-4841 or [makm@gao.gov](mailto:makm@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 listed in appendix III.

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Letter

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A handwritten signature in black ink, appearing to read "Marie A. Mak". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Marie A. Mak  
Director, Contracting and National Security Acquisitions

## Appendix I: Objectives, Scope, and Methodology

This report examines the extent to which the Joint Requirements Council (JRC) has (1) designated and validated joint capabilities and associated requirements; (2) prioritized capabilities and requirements to inform Department of Homeland Security (DHS) investment decisions; (3) engaged with DHS leadership; and is (4) organizationally positioned and staffed to conduct its mission.

To identify the extent to which the JRC designated and validated joint capabilities and associated requirements, we asked the JRC to provide us with a list of all the joint programs that it had validated—or was in the process of reviewing—from its Knowledge Management Decision Support tool since implementing the Joint Requirements Integration and Management System (JRIMS) process in March 2016 up to December 2022.<sup>1</sup> We requested all Capability Analysis Reports and other supporting JRIMS documents for these 15 joint programs to determine when they initiated the JRIMS process. We focused our review on Capability Analysis Reports because these are the first JRIMS document that the JRC validates.

For purposes of our review, we selected those Capability Analysis Reports that were signed and endorsed by the JRC Director or Chairman after September 2018, which is when the JRC last updated its JRIMS Instruction Manual—its JRIMS management policy—to refine its review process. As such, we excluded eight joint programs that had Capability Analysis Reports validated before September 2018 because they were not subject to the latest JRIMS policy update. We also excluded two other programs because they were either still undergoing the JRIMS review process or were subject to the prior review process. See table 7 for all 15 validated joint programs and Capability Analysis Reports, the date they were validated by the JRC, and why, if at all, they were excluded from the analysis:

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<sup>1</sup>DHS issued the JRIMS Directive 107-01 in March 2016, which established the overall policy and structure for the execution of the JRIMS. The Knowledge and Management Decision Support tool facilitates the processing, coordination, tasking, and archiving of JRIMS documents.

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**Appendix I: Objectives, Scope, and  
Methodology**

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**Appendix I: Objectives, Scope, and Methodology**

**Table 7: List of 15 Joint Programs and Associated Capability Analysis Reports (CAR) since 2016**

<b>Joint program</b>	<b>CAR validation date</b>	<b>Reason for exclusion from analysis, if any</b>
Next Generation Vertical Lift	In process as of Feb. 2023	CAR was still in development at time of GAO analysis
Financial Systems Modernization	not applicable	Program stood up before the department implemented the Joint Requirements Integration and Management System (JRIMS) process
Homeland Security Enterprise-Information Sharing	not applicable	Stemmed from Information sharing CARs below and started at Mission Need Statement (MNS) process. MNS was validated on 3/1/2018 so it predated the JRIMS process update
DHS Digital Forensics & Document and Media Exploitation	Nov. 6, 2017	CAR validated before September 2018
Persistent Wide-Area Maritime Surveillance	May 19, 2022	Included in analysis
Counter-Unmanned Aircraft Systems	Dec. 27, 2019	Included in analysis
DHS Tactical, Intelligence, Surveillance, and Reconnaissance Network	Dec. 7, 2021	Included in analysis
Enterprise Analytical Services and Processes	Jan. 29, 2021	Included in analysis
Immigration Data Integration	Nov. 30, 2020	Included in analysis
Joint Interoperable Tactical Communications	Aug. 18, 2017	CAR validated before September 2018
Command and Control	Aug. 22, 2016	CAR validated before September 2018
Common Operating Picture/Common Intelligence Picture	Aug. 22, 2016	CAR validated before September 2018
Law Enforcement Information Sharing Environment	Aug. 22, 2016	CAR validated before September 2018
Maritime Patrol Aircraft Mission System Project	not applicable	Program stood up before the department implemented the JRIMS process
DHS Enterprise Freedom of Information Act IT	Dec.19, 2018	While the CAR was signed shortly after the policy update, the CAR was already in-process before this policy went into effect. As such, GAO excluded this from its review

Source: GAO analysis of Department of Homeland Security (DHS) documents. | GAO-23-106125

After determining which Capability Analysis Reports to include in our review, we then compared the validated JRIMS documents to their supporting document analysis tool, which we refer to as a scorecard for the purposes of our review. The scorecards specify criteria that must be met for validation of the JRIMS document. We compared the initial and final scores for the five selected joint Capability Analysis Reports to determine the extent to which these programs' documents fully addressed

key criteria specified in the JRIMS guidance when they were validated.<sup>2</sup> The JRC scores documents as either not meeting, partially meeting, or meeting specified criterion. We reported the JRC's designated scores for each document.

To support our evaluation, we interviewed JRC officials who are responsible for designating, evaluating, and recommending validation of submitted JRIMS documents, and the JRC Director, who is responsible for validating and endorsing any JRIMS documents designated as joint. We also interviewed officials from select components and DHS offices who sponsored the joint Capability Analysis Reports about their experience going through the JRIMS document review process. Through these interviews, we obtained an understanding of how the JRC and larger JRIMS community review, evaluate, and validate JRIMS documents.

To assess the extent to which the JRC has a process to identify and prioritize capabilities and requirements to inform DHS investment decisions, we reviewed and analyzed DHS policies to identify the JRC's responsibilities for prioritizing capabilities and requirements and informing budget decisions. We also interviewed JRC officials to understand what processes they implemented since being re-established to meet their delegated responsibilities for prioritizing emerging capabilities and requirements and informing investment decisions. We identified two processes since 2016—the Joint Assessment of Requirements and the Capability Gap Register. The JRC did not have results to share for the Joint Assessment of Requirements. We analyzed the reliability of the Capability Gap Register by assessing the gaps in the register against the validated JRIMS documents because these are the source documents used to populate it. We requested all JRIMS source documents designated in the register as either joint or as a priority. For the purpose of our analysis, we focused on those Capability Analysis Reports or Mission Need Statements that were signed after September 2018, when the JRC last updated its JRIMS guidance. This resulted in a sample of 11 JRIMS documents with 93 total capability gaps to review and compare

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<sup>2</sup>Of the five joint Capability Analysis Reports reviewed, three had been scored at least twice. One program, Immigration Data Integration, was scored three times so we used the initial and post-adjudication scores but did not include the interim scores. The Counter-Unmanned Aircraft Systems Capability Analysis Report was only scored once so we just included the initial score.

against data entered in the Capability Gap Register to determine traceability.

In addition, we reviewed supporting documentation and interviewed JRC officials and selected DHS component officials to better understand the processes, controls, and how the Capability Gap Register was used to inform various outputs such as the annual Top Gap Areas of Commonality list. We determined that the Capability Gap Register data were sufficiently reliable for the purposes of describing the process the JRC implemented to record and track emerging capability gaps from component JRIMS source documents until December 2021 when the process was paused.

To determine the extent to which the JRC was engaging with DHS leadership, we examined relevant documents including DHS policies and the JRC's Meeting Management Standard Operating Procedure to identify how frequently meetings were to occur and who should be in attendance. We reviewed JRC meeting schedules and agendas to determine if leadership officials were in attendance. We supplemented our review of meeting materials by interviewing JRC officials about their level of engagement with DHS leadership and requested written responses from DHS leadership about their interactions with the JRC. We also reviewed selected JRIMS documents designated as Deputy's Management Action Group (DMAG) Interest to determine the extent to which leadership was involved in the review or validation of these documents. In addition, we requested written responses from DMAG officials to understand their role in designating and validating capabilities as such as part of the JRIMS process.

To determine the extent to which the JRC is positioned organizationally and staffed to conduct its mission, we reviewed documents including the office's delegation of responsibilities from DHS leadership, organizational charts, budget requests, and past contracts awarded for analytic and program management support assistance. We also reviewed DHS's plan to realign the JRC from the Office of the Secretary to the Management Directorate. We identified the JRC's key responsibilities in policies and assessed the extent to which the five offices that DHS considered for the JRC's potential placement in its study had current responsibilities, as established in DHS policies, that aligned, partially aligned, or did not align with the JRC's current responsibilities using the following ratings:

- Aligned—office has a related responsibility (or responsibilities) to that of the JRC.

- Partially aligned—office has a related responsibility (or responsibilities) that meet part of the JRC responsibility.
- Not aligned—office does not have a related responsibility (or responsibilities) to that of the JRC.

In addition, we compared DHS’s planned realignment of the JRC and supporting materials with federal internal control standards and determined that the principle related to designing control activities was significant to this objective.<sup>3</sup> We also spoke with JRC officials about the office’s role and responsibilities, organizational positioning, and workforce and received written responses from DHS leadership regarding the JRC’s funding, proposed realignment, and staffing.

We conducted this performance audit from June 2022 to August 2023 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.

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<sup>3</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).



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# Appendix II: Comments from the Department of Homeland Security

**Appendix II: Comments from the Department  
of Homeland Security**

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



August 11, 2023

Marie A. Mak  
Director, Contracting and National Security Acquisitions  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-23-106125, "HOMELAND SECURITY: Joint Requirements Council Needs Leadership Attention to Improve Effectiveness"

Dear Ms. Mak:

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

DHS leadership is pleased to note GAO's recognition of the criticality of sound requirements development to improved mission effectiveness and the Joint Requirements Council's (JRC) role in governing the DHS-wide requirements process that ensures opportunities for commonality are identified. For example, the 15 joint capabilities identified by the JRC since implementing the Joint Requirements Integration and Management (JRIMS) process in March 2016 represent cross-Component commitments to ensure common capabilities are developed in a coordinated fashion. These joint capabilities also highlight the impact of the JRC on the development of joint efforts.

GAO also noted that, since 2016, the JRC has refined its processes and procedures for overseeing the Department's Component-driven requirements process. The quality of requirements documents, which are important to capability development outcomes, improved from initial submission to validation. This improvement demonstrates the value added through the JRIMS process and has helped DHS mature its requirements management and related processes across the Department to ensure these efforts are traceable, feasible, and cost informed. DHS remains committed to further maturing and strengthening the Department's requirements process and its integration across other key

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**Appendix II: Comments from the Department  
of Homeland Security**

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enterprise processes, as well as increasing cross-component cooperation to address like capability gaps, as appropriate.

The draft report contained six recommendations, with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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

Sincerely,

JIM H  
CRUMPACKER

 Digitally signed by JIM H  
CRUMPACKER  
Date: 2023.08.11 06:53:44 -04'00'

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

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-23-106125**

GAO recommended that the Secretary of Homeland Security:

**Recommendation 1:** Ensure the JRC validates those joint capability and requirements documents that fully meet key criteria.

**Response:** Concur. Currently, the JRC examines each document carefully, weighs the circumstances in their totality, and takes the action that is in the best interest of the Department, considering both analytical rigor and operational needs. If key criteria<sup>1</sup> cannot be fully met, the JRC will document and take appropriate action in one of several ways. For example, an unmet key criteria may be corrected in a follow-on document when the sponsor is directed via an endorsement memo action item to address the criteria in their next document. In other cases, a partially met key criteria may be addressed as a residual concern<sup>2</sup>, and documented in the endorsement memorandum, as a best practice, to ensure enterprise-wide awareness and potential mitigating actions. The JRC will include this best practice in a future update to the JRIMS instruction. Estimated Completion Date (ECD): September 30, 2024.

**Recommendation 2:** Ensure that the JRC, in coordination with stakeholders, (1) implements an assessment process that prioritizes emerging capability gaps and existing requirements annually, and (2) submits these priorities to the leadership, for consideration in investment decisions.

**Response:** Concur. Currently, the JRC creates the “Top Gap Areas of Commonality” list annually providing prioritized mission needs for resourcing decision-making. This process involves a thorough analysis of the Capability Gap Register, capability gap priorities identified by DHS Components, Secretary of Homeland Security strategic guidance,<sup>3,4</sup> and Component 3-5 year requirements plans, as appropriate. Accordingly, this list considers existing requirements and capabilities as part of defining overall capability gaps. JRC will enhance and mature this list through enterprise-wide collaboration in future iterations. Specifically, JRC will study the feasibility, value add, and resources needed to fully implement this recommendation, to include providing the results of this assessment and proposed actions for leadership consideration, as

<sup>1</sup> DHS Instruction 107-01-001-01 Rev 01, “DHS Manual for the Operation of the Joint Requirements Integration and Management System,” p. B-1 (September 20, 2018).

<sup>2</sup> “Residual concern” is a term used by the JRC to describe an aspect of a document that does not fully meet key criteria.

<sup>3</sup> “Department of Homeland Security’s Strategic Plan for Fiscal Years 2020-2024”

[https://www.dhs.gov/sites/default/files/publications/19\\_0702\\_plcy\\_dhs-strategic-plan-fy-20-24.pdf](https://www.dhs.gov/sites/default/files/publications/19_0702_plcy_dhs-strategic-plan-fy-20-24.pdf)

<sup>4</sup> <https://www.dhs.gov/priorities>

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**Appendix II: Comments from the Department  
of Homeland Security**

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appropriate. ECD: September 30, 2024.

**Recommendation 3:** Ensure that the Deputy’s Management Action Group (DMAG) establishes a process to regularly engage with the JRC to review the JRC’s recommendations, approve and/or direct related follow-on activities, and provide direction and guidance to the JRC.

**Response:** Concur. DHS recognizes the necessity of DMAG engagement with the JRC for operational success, and JRC will remain a key participant supporting the DMAG in accordance with related guidance. The Department plans to align the JRC within the DHS Management Directorate (MGMT), after which the JRC will provide recommendations to the DMAG through the Department’s Under Secretary for Management (USM), as appropriate. Importantly, the USM is a standing DMAG member who also serves as the DHS Chief Acquisition Officer. ECD: September 30, 2024.

**Recommendation 4:** Ensure that the Deputy’s Management Action Group (DMAG), in coordination with the JRC participates in the Joint Requirements Integration and Management System process, by reviewing and validating all designated documents determined to be DMAG Interest by the JRC.

**Response:** Concur. Following alignment of the JRC under MGMT during Fiscal Year (FY) 2024, JRC interactions with the DMAG will be more focused on informing prioritized investment decision-making. Specifically, the designation term “DMAG Interest” ensures that requirements documents warranting Department-wide review follow the entire JRIMS process, including JRC validation and endorsement. Since the JRIMS process is now routine and standard practice across the Department, only documents in support of DMAG-directed activities—or where the JRC deems further guidance is needed—will be shared with the DMAG. The JRIMS process, which we view as a management best practice, “drives” work down to the lowest organizational level, trusting and empowering staff to address issues and elevating them to more senior leadership only when needed. DHS also will revisit the current JRIMS lexicon and update related guidance to better differentiate between documents warranting Department-wide review and those special circumstances when DMAG involvement is necessary. ECD: September 30, 2024.

**Recommendation 5:** Ensure that the Deputy Secretary, prior to finalizing the realignment of the JRC, reconsiders the placement of the JRC within the management directorate to ensure it fully aligns with the JRC’s mission and maintains independence.

**Response:** Concur. The Department agrees that placement of the JRC should fully align with its mission and its need to maintain independence. Senior DHS leadership believes JRC’s placement within the MGMT Office of the Chief Readiness Officer (OCRSO) will

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**Appendix II: Comments from the Department  
of Homeland Security**

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achieve these imperatives and ensure that requirements governance continues at the appropriate level within the Department. Upon transitioning to MGMT OCRSO, the JRC's roles and responsibilities will be further assessed to determine the most effective organizational alignment and for DHS leadership to take action, as appropriate. ECD: September 30, 2024.

**Recommendation 6:** Ensure that the Deputy Secretary, prior to the realignment of the JRC, assesses the JRC's workforce to ascertain the extent to which it has the appropriate number and mix of staff with the necessary skills to fulfill its responsibilities.

**Response:** Concur. The Department recognizes the importance of sufficiently resourcing the JRC to include a mix of staff with appropriate skillsets. Once transitioned to MGMT OCRSO during FY 2024 and its roles and responsibilities are revalidated/prioritized by senior DHS leadership, that leadership will also then ensure the JRC has the resources needed to fulfill its mission. ECD: September 30, 2024.

# Accessible Text for Appendix II: Comments from the Department of Homeland Security

August 11, 2023

Marie A. Mak  
Director, Contracting and National Security Acquisitions  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-23-106125, "HOMELAND SECURITY: Joint Requirements Council Needs Leadership Attention to Improve Effectiveness"

Dear Ms. Mak:

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

DHS leadership is pleased to note GAO's recognition of the criticality of sound requirements development to improved mission effectiveness and the Joint Requirements Council's (JRC) role in governing the DHS-wide requirements process that ensures opportunities for commonality are identified. For example, the 15 joint capabilities identified by the JRC since implementing the Joint Requirements Integration and Management (JRIMS) process in March 2016 represent cross-Component commitments to ensure common capabilities are developed in a coordinated fashion. These joint capabilities also highlight the impact of the JRC on the development of joint efforts.

GAO also noted that, since 2016, the JRC has refined its processes and procedures for overseeing the Department's Component-driven requirements process. The quality of requirements documents, which are important to capability development outcomes, improved from initial submission to validation. This improvement demonstrates the value added through the JRIMS process and has helped DHS mature its requirements management and related processes across the Department to ensure these efforts are traceable, feasible, and cost informed. DHS remains

committed to further maturing and strengthening the Department's requirements process and its integration across other key enterprise processes, as well as increasing cross-component cooperation to address like capability gaps, as appropriate.

The draft report contained six recommendations, with which the Department concurs. Enclosed find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

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

Sincerely,

JIM H CRUMPACKER

Digitally signed by JIM H CRUMPACKER

Date: 2023.08.11 06:53:44 -04'00'

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

Enclosure

Enclosure: Management Response to Recommendations Contained in GAO-23-106125

GAO recommended that the Secretary of Homeland Security:

Recommendation 1: Ensure the JRC validates those joint capability and requirements documents that fully meet key criteria.

Response: Concur. Currently, the JRC examines each document carefully, weighs the circumstances in their totality, and takes the action that is in the best interest of the Department, considering both analytical rigor and operational needs. If key criteria<sup>1</sup> cannot be fully met, the JRC will document and take appropriate action in

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<sup>1</sup> DHS Instruction 107-01-001-01 Rev 01, "DHS Manual for the Operation of the Joint Requirements Integration and Management System," p. B-1 (September 20, 2018).



one of several ways. For example, an unmet key criteria may be corrected in a follow-on document when the sponsor is directed via an endorsement memo action item to address the criteria in their next document. In other cases, a partially met key criteria may be addressed as a residual concern<sup>2</sup>, and documented in the endorsement memorandum, as a best practice, to ensure enterprise-wide awareness and potential mitigating actions. The JRC will include this best practice in a future update to the JRIMS instruction. Estimated Completion Date (ECD): September 30, 2024.

Recommendation 2: Ensure that the JRC, in coordination with stakeholders, (1) implements an assessment process that prioritizes emerging capability gaps and existing requirements annually, and (2) submits these priorities to the leadership, for consideration in investment decisions.

Response: Concur. Currently, the JRC creates the “Top Gap Areas of Commonality” list annually providing prioritized mission needs for resourcing decision-making. This process involves a thorough analysis of the Capability Gap Register, capability gap priorities identified by DHS Components, Secretary of Homeland Security strategic guidance,<sup>34</sup> and Component 3-5 year requirements plans, as appropriate. Accordingly, this list considers existing requirements and capabilities as part of defining overall capability gaps. JRC will enhance and mature this list through enterprise-wide collaboration in future iterations. Specifically, JRC will study the feasibility, value add, and resources needed to fully implement this recommendation, to include providing the results of this assessment and proposed actions for leadership consideration, as appropriate. ECD: September 30, 2024.

Recommendation 3: Ensure that the Deputy’s Management Action Group (DMAG) establishes a process to regularly engage with the JRC to review the JRC’s recommendations, approve and/or direct related follow-on activities, and provide direction and guidance to the JRC.

Response: Concur. DHS recognizes the necessity of DMAG engagement with the JRC for operational success, and JRC will remain a key participant supporting the DMAG in accordance with related guidance. The Department plans to align the JRC within the DHS Management Directorate (MGMT), after which the JRC will provide recommendations to the DMAG through the Department’s Under Secretary for

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<sup>2</sup> “Residual concern” is a term used by the JRC to describe an aspect of a document that does not fully meet key criteria.

<sup>3</sup> “Department of Homeland Security’s Strategic Plan for Fiscal Years 2020-2024”  
[https://www.dhs.gov/sites/default/files/publications/19\\_0702\\_plcy\\_dhs-strategic-plan-fy20-24.pdf](https://www.dhs.gov/sites/default/files/publications/19_0702_plcy_dhs-strategic-plan-fy20-24.pdf)

<sup>4</sup> <https://www.dhs.gov/priorities>

Management (USM), as appropriate. Importantly, the USM is a standing DMAG member who also serves as the DHS Chief Acquisition Officer. ECD: September 30, 2024.

Recommendation 4: Ensure that the Deputy's Management Action Group (DMAG), in coordination with the JRC participates in the Joint Requirements Integration and Management System process, by reviewing and validating all designated documents determined to be DMAG Interest by the JRC.

Response: Concur. Following alignment of the JRC under MGMT during Fiscal Year (FY) 2024, JRC interactions with the DMAG will be more focused on informing prioritized investment decision-making. Specifically, the designation term "DMAG Interest" ensures that requirements documents warranting Department-wide review follow the entire JRIMS process, including JRC validation and endorsement. Since the JRIMS process is now routine and standard practice across the Department, only documents in support of DMAG-directed activities—or where the JRC deems further guidance is needed—will be shared with the DMAG. The JRIMS process, which we view as a management best practice, "drives" work down to the lowest organizational level, trusting and empowering staff to address issues and elevating them to more senior leadership only when needed. DHS also will revisit the current JRIMS lexicon and update related guidance to better differentiate between documents warranting Department-wide review and those special circumstances when DMAG involvement is necessary. ECD: September 30, 2024.

Recommendation 5: Ensure that the Deputy Secretary, prior to finalizing the realignment of the JRC, reconsiders the placement of the JRC within the management directorate to ensure it fully aligns with the JRC's mission and maintains independence.

Response: Concur. The Department agrees that placement of the JRC should fully align with its mission and its need to maintain independence. Senior DHS leadership believes JRC's placement within the MGMT Office of the Chief Readiness Officer (OCRSO) will achieve these imperatives and ensure that requirements governance continues at the appropriate level within the Department. Upon transitioning to MGMT OCRSO, the JRC's roles and responsibilities will be further assessed to determine the most effective organizational alignment and for DHS leadership to take action, as appropriate. ECD: September 30, 2024.

Recommendation 6: Ensure that the Deputy Secretary, prior to the realignment of the JRC, assesses the JRC's workforce to ascertain the extent to which it has the appropriate number and mix of staff with the necessary skills to fulfill its responsibilities.

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Response: Concur. The Department recognizes the importance of sufficiently resourcing the JRC to include a mix of staff with appropriate skillsets. Once transitioned to MGMT OCRSO during FY 2024 and its roles and responsibilities are revalidated/prioritized by senior DHS leadership, that leadership will also then ensure the JRC has the resources needed to fulfill its mission. ECD: September 30, 2024.

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## Appendix III: GAO Contact and Staff Acknowledgments

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### GAO Contact

Marie A. Mak, (202) 512-4841 or [MakM@gao.gov](mailto:MakM@gao.gov)

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### Staff Acknowledgments

In addition the contact named above, the following staff members made key contributions to this report: Angie Nichols-Friedman (Assistant Director), Alexandra Wilk (Analyst-in-Charge), Mary Diop, Marcus Ferguson, Stephanie Gustafson, Tonya Humiston, Jessica Karnis, Jean McSween, Jasmine Porter, John Rastler-Cross, Tristan Shaughnessy, Hunter Stephan, Anne Louise Taylor, and Joshua Timko.

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