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Comptroller General  
of the United States

**Accessible Version**

April 23, 2020

The Honorable Chad F. Wolf

Acting Secretary of Homeland Security

Washington, D.C. 20528

**Priority Open Recommendations: Department of Homeland Security**

The purpose of this letter is to provide an update on the overall status of the U.S. Department of Homeland Security's (DHS) implementation of GAO's recommendations and to call your personal attention to areas where open recommendations should be given high priority.<sup>1</sup> In November 2019, we reported that on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.<sup>2</sup> DHS's recommendation implementation rate was 83 percent. As of March 2020, DHS had 390 open recommendations. Fully implementing all open recommendations could significantly improve DHS's operations.

Since our April 2019 letter, DHS has implemented four of our 26 open priority recommendations. In doing so, DHS, as a member of the Mitigation Framework Leadership Group, published the National Mitigation Investment Strategy to identify, prioritize, and guide federal investments in disaster resilience and hazard mitigation-related activities. Additionally, the Coast Guard has taken steps to implement an electronic health record system. Finally, DHS has improved its collection of data on cybersecurity positions and developed guidance to identify cybersecurity critical needs that align to the National Initiative for Cybersecurity Education framework.

We ask your continued attention on the 22 priority recommendations remaining from those we identified in the 2019 letter. We also are adding seven new recommendations related to border security and immigration, transportation security, Coast Guard infrastructure, and cybersecurity, bringing the total number of priority recommendations to 29. (See enclosure for the list of recommendations).

The 29 priority recommendations fall into the following six areas.

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

<sup>2</sup>GAO, *Performance and Accountability Report: Fiscal Year 2018*, [GAO-20-1SP](#) (Washington, D.C.: Nov. 19, 2019).

## Emergency Preparedness and Response.

We have four priority recommendations in this area. The National Flood Insurance Program (NFIP) has been on our high-risk list since 2006, and while we have emphasized the need for Congress to enact comprehensive reform of the program, we have also identified three actions that the Federal Emergency Management Agency (FEMA) could take to improve its administration of it. First, in October 2008, we recommended that FEMA take steps to ensure that its rate-setting methods and data result in premium rates that accurately reflect the full risk of losses from flooding. In November 2018, FEMA officials told us they had begun to redesign NFIP's risk rating system. While they had expected to begin implementing the new rates in 2020, in November 2019, officials said they have postponed implementation until October 2021 to minimize unintentional negative effects on policyholders.

Second, in August 2009, we recommended that FEMA annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates for Write-Your-Own (WYO) companies. FEMA officials said that it was responding to this recommendation as part of its development of a final rule on WYO compensation practices, which has not yet been completed. An annual analysis of WYO insurers' actual expenses and profit would provide greater transparency and accountability over existing payments to the WYOs before a new rule is finalized.

Third, in July 2013, we recommended that FEMA develop and implement a plan, including a timeline, to obtain elevation information for all of its policies, especially subsidized policies, as soon as practicable. As part of the redesign of its risk rating system, FEMA will obtain multiple sources of data and information about a property's risk of flooding—from which it may be able to derive elevation information on some properties—to develop the insurance rate. As noted above, FEMA has delayed the implementation of this system until October 2021. FEMA has also issued a Request for Information on obtaining property elevation information from third party sources and is currently reviewing responses from potential vendors.

On a related issue, in September 2012, we recommended that FEMA develop a methodology to better assess a jurisdiction's capability to respond to and recover from a disaster without federal assistance. FEMA has considered changing its methodology, but has yet to identify a new methodology and does not have an estimated completion date for implementation. Until FEMA implements a new methodology, the Administrator of FEMA runs the risk of recommending that the President award Public Assistance to jurisdictions that have the capability to respond and recover from a disaster without federal assistance.

## Border Security.

We have eight priority recommendations in this area. In March 2014, we recommended that U.S. Customs and Border Protection (CBP) analyze data to determine the contribution of surveillance technologies to CBP's border security efforts. Border Patrol has taken steps to address this recommendation, and now has the capability to use data to evaluate the contributions of technologies. However, to fully implement this recommendation, CBP needs to use available data to evaluate the individual and collective contributions of specific technologies and fully assess its progress in implementing its Southwest Border Technology Plan.

We have one remaining recommendation designated as priority from our December 2015 report on asylum fraud that could strengthen the U.S. Citizenship and Immigration Services' (USCIS) efforts to assess and address fraud risks within the asylum process. USCIS drafted a fraud risk assessment in September 2017. However, in 2019, Asylum Division officials identified limitations in the data used in the assessment and USCIS is working to complete a qualitative

risk assessment by the end of May 2020, which we will assess to determine if it fully addresses our recommendation.

In February 2017, we made a recommendation to DHS to develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border. Developing metrics to assess the contributions of fencing to border security operations could better position DHS to make resource allocation decisions with the best information available to inform competing mission priorities and investments. As of October 2019, DHS stated that they have developed and are testing the initial metrics and they will continue to gather data to identify if these metrics are accurately representing realities in the field. The estimated completion date is September 2021.

In July 2016, we made three recommendations to CBP to improve risk management within its collection processes for antidumping and countervailing (AD/CV) duties. As of February 2020, CBP had taken steps to address these recommendations, but additional steps are needed to minimize duty processing errors, complete its development of a risk assessment model, and mitigate the risk of AD/CV duty nonpayment. CBP had begun tracking some processing errors, but does not collect or analyze data on the effects of these errors on revenue collection. As of February 2020, CBP had tested two new statistical models to identify key nonpayment risk factors and predict future nonpayment risk levels. CBP plans to implement the statistical models and use them to inform its risk-based bonding framework for setting bond amounts based on the potential risk to AD/CV duty collections. We will assess these approaches as they are implemented to determine the extent to which they meet the intent of the recommendations.

In July 2018, we recommended that CBP analyze the costs associated with future barrier segments along the southwest border and include cost as a factor in the Impedance and Denial Prioritization Strategy. As of January 2020, Border Patrol officials stated they do not consider cost when prioritizing the locations where Border Patrol plans to construct barriers, and they do not have plans to do so. To fully implement our recommendation, CBP needs to analyze the costs associated with future barrier construction projects and incorporate that analysis into how it prioritizes construction of barriers in certain border locations.

In July 2015, we recommended that DHS and the Department of Health and Human Services (HHS) jointly develop and implement a documented interagency process with clearly defined roles and responsibilities for all agencies involved in the referral and placement of unaccompanied alien children (UAC) in HHS shelters. In 2018, DHS and HHS developed two documents to guide interagency procedures related to the processing of UAC. However, we reported in February 2020 that the departments had not fully implemented these agreements. Until DHS and HHS implement procedures aimed at improving the efficiency and accuracy of the interagency UAC referral and placement process, information-sharing gaps will remain.

#### Transportation Security.

We have three priority recommendations in this area. In May 2011, we recommended that DHS, through the Transportation Security Administration's (TSA) and the U.S. Coast Guard's combined efforts, conduct an assessment of the Transportation Worker Identification Credential Program's effectiveness. This assessment is to determine whether the benefits of continuing to implement and operate the program in its present form and planned use with readers surpass the costs. In March 2020, TSA provided an assessment for our consideration. We reviewed the report and determined that DHS has made progress towards addressing our recommendation. However, the report is missing information on, for example, how data specific to assigned facility risk categories were updated to correct for previous shortfalls in assessing security benefits. Absent this information, including how data on this topic were collected and used to inform the assessment, we cannot affirm that the evaluation appropriately addresses our

recommendations. We will continue to monitor steps DHS takes to address this recommendation.

In April 2019, we recommended that the Administrator of TSA develop processes for conducting and reporting to relevant stakeholders a comprehensive analysis of covert test results collected by TSA headquarters officials and TSA officials at airports to identify vulnerabilities in screener performance and common root causes contributing to screener test passes and failures. A comprehensive analysis of these results would provide TSA greater knowledge of the reasons for, and factors associated with, system-wide vulnerabilities in Transportation Security Officers' performance of checkpoint and checked baggage screening and would better position TSA to address any security gaps. In March 2020, TSA developed a new process to better collect and analyze national-level covert test data, and was in the process of finalizing its analysis and reporting of results. We will continue to monitor TSA's progress with this recommendation.

In December 2018, we recommended that TSA should develop a strategic workforce plan for its Surface Division, which could include determining the number of personnel necessary to meet the goals set for its Pipeline Security Branch, as well as the knowledge, skills, and abilities, including cybersecurity, that are needed to effectively conduct pipeline security reviews. TSA officials reported in February 2020 that development and drafting of the workforce plan was scheduled to be initiated within the month. We will continue to monitor steps TSA takes to address this recommendation.

#### Infrastructure and Management.

We have five priority recommendations in this area. In September 2014, to improve transparency and support more informed decision making by congressional leaders and other decision-makers regarding the department's headquarters consolidation plans, we recommended that DHS and the General Services Administration (GSA) conduct a comprehensive needs assessment and gap analysis of current and needed capabilities. We recommended that this assessment should take into consideration changing conditions and an alternatives analysis that identifies the costs and benefits of leasing and construction alternatives for the remainder of the project and prioritizes options to account for funding instability. We also recommended that DHS and GSA develop revised cost and schedule estimates for the remaining portions of the consolidation project. These estimates should conform to GSA guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.

To address these two recommendations, the department and other stakeholders have made revisions to the DHS headquarters consolidation plan, and DHS is required to submit a current plan to Congress. However, the timeframe for DHS submitting this information is not clear because the plan is undergoing additional revisions and review. Given the magnitude of the headquarters consolidation project—in terms of its multi-billion dollar cost and its profound impact on future departmental operations—it will be important for the updated plan to include a robust analysis of current and future needed capabilities, among other things.

In October 2017, we recommended that the Coast Guard establish a plan with target dates and milestones for closing boat stations that it has determined provide overlapping search and rescue coverage and are unnecessarily duplicative. We also recommended that the Coast Guard take action to close the stations identified according to its plan and target dates. The Coast Guard continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. As of December 2019, the Coast Guard has not established a plan with target dates and milestones for closing boat stations or closed any stations.

In February 2019, we recommended that the Coast Guard employ models for its shore infrastructure asset lines to predict the outcome of investments, analyze trade-offs, and optimize decisions among competing investments. Employing models to predict the future condition and

performance of facilities could potentially identify and achieve cost savings, according to leading practices. DHS agreed with our recommendation, but, as of January 2020, the Coast Guard has not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternative models for its asset lines, and estimated that the Coast Guard will complete this analysis by December 31, 2020.

#### Cybersecurity.

We have six priority recommendations in this area. In February 2017, we recommended that DHS establish metrics for assessing the National Cybersecurity and Communications Integration Center's adherence to applicable principles in carrying out statutorily-required cybersecurity functions. In addition, we recommended that DHS establish methods for monitoring the implementation of cybersecurity functions against the principles on an ongoing basis. The department has since taken action, but needs to complete several actions that are intended to address these recommendations. For example, DHS stated that it continues to determine the applicability of key performance indicators and performance targets. To facilitate adoption of the National Institute of Standards and Technology's (NIST) *Framework for Improving Critical Infrastructure Cybersecurity*, in February 2018, we recommended that DHS take steps to consult with respective sector partners, such as the sector coordinating councils, and NIST, as appropriate, to develop methods for determining the level and type of adoption of the Framework by entities across their respective sectors.

As of January 2020, the department had begun taking steps to develop methods to determine the level and type of framework adoption in the respective sectors. Specifically, in October 2019, DHS, in coordination with its Information Technology (IT) sector partner, administered a survey to all small and mid-sized IT sector organizations to gather information on, among other things, framework use and plans to report on the results in 2020. DHS officials stated that any small or mid-sized business across all critical infrastructure sectors could complete the survey and that the department had promoted the survey to all sectors. While the department has ongoing initiatives, implementing our recommendations to gain a more comprehensive understanding of the framework's use by critical infrastructure sectors is essential to the success of protection efforts.

In March 2019, we recommended that DHS take steps to ensure that positions in the 2210 IT management occupational series are assigned appropriate cybersecurity work role codes and assess the accuracy of position descriptions. DHS concurred with our recommendation. DHS conducted an audit of its components' cybersecurity coding efforts in fiscal year 2018 and identified actions that components needed to take to complete the assignment of appropriate cybersecurity work role codes and assess the accuracy of position descriptions. As of January 2020, DHS was conducting a second audit for fiscal year 2019 which it estimates will be completed by June 30, 2020.

In July 2019, we recommended that DHS develop a cybersecurity risk management strategy that includes the key elements called for in federal guidance and establish and document a process for coordination between its cybersecurity risk management and enterprise risk management functions. DHS concurred with our recommendations. In January 2020, DHS described steps it plans to take to implement these recommendations, such as developing an enterprise-wide cybersecurity risk management strategy and clarifying cybersecurity roles and responsibilities for coordination with offices responsible for enterprise risk management. DHS estimated that it would complete these actions by July 31, 2020.

#### Chemical and Nuclear Security.

We have three priority recommendations in this area. In August 2018, we recommended the Assistant Secretary for DHS's Countering Weapons of Mass Destruction (CWMD) Office develop a strategy and implementation plan to help DHS guide, support, integrate, and

coordinate chemical defense programs and activities. CWMD officials provided GAO with the completed strategy in December 2019 and plan to complete the implementation plan by September 30, 2020.

In January 2018, we recommended that DHS develop a monitoring system to help ensure that CBP officials comply with license verification policies and procedures for imported radiological material. We also recommended that DHS and CBP develop a system that better identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments. The agency agreed with these recommendations and is taking steps to address the issues. As of March 2020, CBP had developed a series of targeting rules to define the levels of risk for shipments by various entities. However, verification is based on compliance history rather than on the risk posed by the type and quantity of material, as was contemplated by our recommendation. CBP has also developed a draft Radiation Detection Standard Operating Procedures Directive, which is being briefed to senior leadership for approval. CBP plans to implement the Directive by April 30, 2020.

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In 2019, we issued our biennial update to our [high-risk program](#), which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.<sup>3</sup> Our high-risk program has served to identify and help resolve serious weaknesses in areas that involve substantial resources and provide critical service to the public.

One of our high-risk areas, [Strengthening DHS Management Functions](#), centers directly on DHS.<sup>4</sup> Another high-risk area is related to [FEMA's management of the National Flood Insurance Program](#).<sup>5</sup> Several government-wide, high-risk areas—including (1) [ensuring the cybersecurity of the nation](#), (2) [improving management of IT acquisitions and operations](#), (3) [strategic human capital management](#), (4) [managing federal real property](#), and (5) [the government-wide security clearance process](#)—have direct implications for DHS and its operation.<sup>6</sup> We urge your attention to the DHS and government-wide high-risk issues as they relate to DHS. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within DHS.

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees including the Committees on Appropriations, Budget, and Homeland Security and Governmental Affairs, United States Senate; and the Committees on Appropriations, Budget, and Oversight and Reform, House of Representatives. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

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

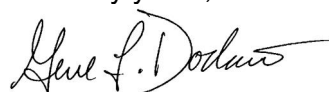
<sup>4</sup>[GAO-19-157SP](#). For a full discussion of this high-risk area, see pages 185 to 189 of the March 2019 high-risk update.

<sup>5</sup>[GAO-19-157SP](#). For a full discussion of this high-risk area, see pages 272 to 274 of the March 2019 high-risk update.

<sup>6</sup>[GAO-19-157SP](#). See pages 178-184 for Ensuring the Cybersecurity of the Nation, pages 123-127 for Improving the Management of IT Acquisitions and Operations, pages 75-77 for Strategic Human Capital Management, pages 78-85 for Managing Federal Real Property, and pages 170-177 for Government-wide Personnel Security Clearance Process.

I appreciate DHS's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Charles Michael Johnson, Jr., Managing Director, Homeland Security and Justice Team at [JohnsonCM@gao.gov](mailto:JohnsonCM@gao.gov) or (202) 512-8777. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 390 open recommendations. Thank you for your attention to these matters.

Sincerely yours,



Gene L. Dodaro

Comptroller General

of the United States

Enclosure

cc: Kenneth T. Cuccinelli, Senior Official Performing the Duties of the Deputy Secretary

Randolph D. "Tex" Alles, Deputy Under Secretary for Management

Peter T. Gaynor, Administrator, Federal Emergency Management Agency

Mark A. Morgan, Acting Commissioner, U.S. Customs and Border Protection

Joseph Edlow, Deputy Director for Policy, U.S. Citizenship and Immigration Services

Rodney S. Scott, Chief, United States Border Patrol

David P. Pekoske, Administrator, Transportation Security Administration

Admiral Karl L. Schultz, Commandant of the Coast Guard, U.S. Coast Guard

Christopher C. Krebs, Director, Cybersecurity and Infrastructure Security Agency

Angela S. Bailey, Chief Human Capital Officer, Office of the Chief Human Capital Officer

Gary Rasicot, Acting Assistant Secretary, Countering Weapons of Mass Destruction Office



## **Emergency Preparedness and Response**

*Flood Insurance: FEMA's Rate-Setting Process Warrants Attention. GAO-09-12. Washington, D.C.: October 31, 2008.*

**Recommendation:** The Secretary of DHS should direct the Federal Emergency Management Agency (FEMA) to take steps to ensure that its rate-setting methods and the data it uses to set rates result in full-risk premium rates that accurately reflect the risk of losses from flooding. These steps should include, for example, verifying the accuracy of flood probabilities, damage estimates, and flood maps; ensuring that the effects of long-term planned and ongoing development, as well as climate change, are reflected in the flood probabilities used; and reevaluating the practice of aggregating risks across zones.

**Action Needed:** FEMA generally concurred with this recommendation, but expressed two reservations. First, FEMA suggested that the report did not fully recognize the difficulties of setting flood insurance rates, including the challenge of potentially catastrophic losses in any given year. However, we found a number of areas that raise questions about the accuracy of the National Flood Insurance Program (NFIP) rates and highlighted additional areas for analysis by FEMA. Second, FEMA said that the report did not accurately present the status of its map modernization efforts and their impact on premium rates. With respect to the status of map modernization, we noted that FEMA used a different form of measuring progress from the method we used and that we added FEMA's data to provide an additional perspective. FEMA also said that we overstated the impact of older maps on rate setting and that in many areas the flood hazard has not changed or may be decreasing. However, FEMA provided no analysis to support its contention that older maps are not always outdated. We also noted that up-to-date maps support a flood insurance program that is more aligned with actual risk. FEMA stated that it is redesigning the NFIP's risk-rating system. New rates will be rolled out to groups of policyholders incrementally, and FEMA originally expected the new rates to be available in mid-2019 with implementation for policyholders starting in 2020. Officials added that it will take several more years after that to implement the new rates for all policyholders. However, in November 2019, officials said they have postponed implementation until October 2021 to minimize unintentional negative effects on policyholders. To fully implement the recommendation, FEMA will need to complete the redesign of its risk rating system, ensuring that it produces premium rates that accurately reflect the full risk of loss of the underlying property.

GAO concurs with the status of this recommendation as reported by FEMA in its fiscal year 2021 budget justification.<sup>7</sup>

**High Risk Area:** National Flood Insurance Program

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

**Contact information:** [CackleyA@gao.gov](mailto:CackleyA@gao.gov), (202) 512-8678

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

**Recommendation:** To provide transparency and accountability over the payments FEMA makes to Write-Your-Own (WYO) for expenses and profits, the Secretary of Homeland Security

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<sup>7</sup>Department of Homeland Security Implementation Status of Public Recommendations, Supplement to Annual Budget Justification for Fiscal Year 2021, February 10, 2020.



should direct the FEMA Administrator to annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates.

**Action Needed:** FEMA initially did not concur with this recommendation. To fully implement it, FEMA will need to develop and implement a process to annually analyze WYO expense and profit data and compare it to the rates it uses to compensate WYOs. On July 2019, FEMA issued an Advance Notice of Proposed Ruling seeking comments by September 6, 2019 regarding possible approaches to incorporating actual flood insurance expense data into the WYO payment methodology. As of February 2020, FEMA officials said that they would complete an annual analysis of WYO data by the end of fiscal year 2020 and that they were reviewing comments received in response to the July 2019 notice.

GAO concurs with the status of this recommendation as reported by FEMA in its fiscal year 2021 budget justification.

**High Risk Area:** National Flood Insurance Program

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

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*Flood Insurance: More Information Needed on Subsidized Properties. GAO-13-607. Washington, D.C.: July 3, 2013.*

**Recommendation:** To establish full-risk rates for properties with previously subsidized rates that reflect their risk for flooding, the Secretary of DHS should direct the FEMA Administrator to develop and implement a plan, including a timeline, to obtain needed elevation information as soon as practicable.

**Action Needed:** FEMA agreed with this recommendation. FEMA expected to begin gathering elevation information as part of its new rating methodology that it planned to implement starting in 2020. In November 2019, officials said they have postponed implementation until October 2021 to minimize unintentional negative effects on policyholders. To fully implement this recommendation, FEMA will need to ensure that it is able to produce elevation data for all currently subsidized properties.

GAO concurs with the status of this recommendation as reported by FEMA in its fiscal year 2021 budget justification.

**High Risk Area:** National Flood Insurance Program

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

**Contact information:** [CackleyA@gao.gov](mailto:CackleyA@gao.gov), (202) 512-8678

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

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

**Action Needed:** FEMA agreed with this recommendation. On October 5, 2018, the Disaster Recovery Reform Act of 2018 (DRRA), was signed into law. Section 1239 of the DRRA directs

the FEMA Administrator to initiate a rulemaking to update the factors considered when evaluating a request for a major disaster declaration, including the estimated cost of assistance (i.e., the per capita indicator and minimum threshold). According to FEMA, the agency is working to implement this provision but an exact timeframe for the rulemaking process is unknown.

GAO concurs with the status of this recommendation as reported by FEMA in its fiscal year 2021 budget justification.

**Director:** Christopher P. Currie, Homeland Security and Justice

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### **Border Security**

*Arizona Border Surveillance Technology Plan: Additional Actions Needed to Strengthen Management and Assess Effectiveness. GAO-14-368. Washington, D.C.: March 3, 2014.*

**Recommendation:** To improve the acquisition management of the Arizona Border Surveillance Technology Plan and the reliability of its cost estimates and schedules, assess the effectiveness of deployed technologies, and better inform the U.S. Customs and Border Protection's (CBP) deployment decisions, once data on asset assists are required to be recorded and tracked, the Commissioner of CBP should analyze available data on apprehensions and seizures and technological assists, in combination with other relevant performance metrics or indicators, as appropriate, to determine the contribution of surveillance technologies to CBP's border security efforts.

**Action Needed:** CBP agreed with our recommendation. Since our 2014 report, CBP expanded its Arizona Border Surveillance Technology Plan to the Southwest Border Technology Plan. Among other things, in March 2019, Border Patrol added a capability for its officials to generate a report with performance data for surveillance technologies, and, in February 2020, Border Patrol officials stated the data gathered in the report were reliable. Border Patrol officials provided examples of how they use performance data to help identify gaps in capabilities and inform future investments in surveillance technologies. Border Patrol officials are also developing a surveillance capability score intended to represent the combined contributions of individual technology assets and agents on patrol to conduct surveillance in a given area. Border Patrol plans to report this score in fiscal year 2021, according to documentation provided by Border Patrol. We view these efforts, as described, as important progress toward fulfilling our recommendation, and will review the planned surveillance capability score once it is implemented to determine whether CBP has fully implemented our recommendation.

GAO concurs with the status of this recommendation as reported by CBP in its fiscal year 2021 budget justification.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

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*Asylum: Additional Actions Needed to Assess and Address Fraud Risks. GAO-16-50. Washington, D.C.: December 2, 2015.*

**Recommendation:** To provide reasonable assurance that the U.S. Citizenship and Immigration Services' (USCIS) fraud prevention controls are adequate and effectively implemented, and

ensure that asylum officers and Fraud Detection and National Security Directorate immigration officers have the capacity to detect and prevent fraud, the Secretary of Homeland Security should direct USCIS to conduct regular fraud risk assessments across the affirmative asylum application process.

**Action Needed:** USCIS agreed with this recommendation. To fully implement it, USCIS should regularly assess fraud risks across the affirmative asylum process to provide USCIS more complete information on risks that may affect the integrity of the process and help USCIS target its fraud prevention efforts to those areas that are of highest risk. USCIS drafted a fraud risk assessment in September 2017, but Asylum Division officials identified limitations in the data used in the assessment. As of March 2020, USCIS is working to complete a qualitative risk assessment by the end of May 2020 for our review.

GAO concurs with the status of this recommendation as reported by USCIS in its fiscal year 2021 budget justification.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

*Southwest Border Security: Additional Actions Needed to Better Assess Fencing's Contributions to Operations and Provide Guidance for Identifying Capability Gaps. GAO-17-331. Washington, D.C.: February 16, 2017.*

**Recommendation:** To ensure Border Patrol has the best available information to inform future investments in tactical infrastructure (TI) and resource allocation decisions among TI and other assets Border Patrol deploys in the furtherance of border security operations, the Chief of the Border Patrol should develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border using the data Border Patrol already collects and apply this information, as appropriate, when making investment and resource allocation decisions.

**Action Needed:** DHS agreed with this recommendation and stated that it planned to develop metrics in its operational control framework for border security operations. To fully implement it, the Border Patrol should complete its efforts to develop metrics for assessing the contributions of pedestrian and vehicle fencing to border security operations and apply these metrics when making resource allocation decisions. As of October 2019, DHS stated that they have developed and are testing the initial metrics and they will continue to gather data to identify if these metrics are accurately representing realities in the field. The estimated completion date is September 2021.

GAO concurs with the status of this recommendation as reported by CBP in its fiscal year 2021 budget justification.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

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

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

**Action Needed:** CBP commented on this recommendation in its fiscal year 2021 budget justification. In its February 2020 fiscal year 2021 budget justification, CBP reported that it had taken some steps to implement this recommendation; however, we continue to believe that full implementation of this recommendation will require the agency to take additional steps. As of February 2020, CBP had taken some steps to collect and analyze data on instances when it has not liquidated—concluded the entry review process and assessed the final AD/CV duties, taxes, fees, and other charges—during the 6-month time limit established by law. As of February 2020, CBP had begun tracking the number of deemed liquidations, which decreased from about 7,300 entries in fiscal year 2017 to 2,500 in fiscal year 2018, and increased to about 4,600 in fiscal year 2019. CBP attributed the increase in part to the complexities involved in applying the final duty rates associated with six different Commerce AD/CV duty liquidation instructions, which covered about 25 percent of the 2019 deemed liquidations. In fiscal year 2019, CBP added an additional deemed liquidation-related question to its self-inspection process worksheet to help management identify processing weaknesses and take corrective action. Similarly, CBP had added a question on premature liquidations to its self-inspection program in fiscal year 2017. To fully implement this recommendation, CBP will need to track and analyze data on premature liquidations. It will also need to track and analyze data on the revenue effects of both deemed and premature liquidations.

**Recommendation:** To improve risk management in the collection of AD/CV duties and to identify new or changing risks, CBP should regularly conduct a comprehensive risk analysis that assesses both the likelihood and the significance of risk factors related to AD/CV duty collection. For example, CBP could construct statistical models that explore the associations between potential risk factors and both the probability of nonpayment and the size of nonpayment when it occurs.

**Action Needed:** CBP commented on this recommendation in its fiscal year 2021 budget justification. In its February 2020 fiscal year 2021 budget justification, CBP reported that it had taken some steps to implement this recommendation; however, full implementation of this recommendation will require the agency to take the additional step of using the model regularly to set bonding requirements for importers. As of February 2020, CBP had developed and successfully tested two new statistical models to identify key nonpayment risk factors and predict future nonpayment risk levels. The risk factors included, but were not limited to, the type of good, country of origin of the good, and whether the importer is from a foreign country. By using historical data from fiscal years 2007 through 2015, one test demonstrated that CBP could have predicted over 95 percent of the importers with delinquent AD/CV duty bills in fiscal years 2016 and 2017. CBP anticipates using a model in conjunction with risk-based bonds.

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

analysis to identify entries that pose heightened risk and taking appropriate action to mitigate the risk.

**Action Needed:** CBP commented on this recommendation in its fiscal year 2021 budget justification. In its February 2020 fiscal year 2021 budget justification, CBP reported that it had taken some steps to implement this recommendation; however, full implementation of this recommendation will require the agency to begin setting bonding requirements for importers based on the risk that an importer may become delinquent on its financial obligations. As of February 2020, CBP had developed a risk-based framework for setting continuous-entry and single-transaction bond amounts based on new formulas that incorporate nonpayment risk factors identified in its new statistical models. Using the new proposed bond formulas, CBP analyzed fiscal year 2007 through 2017 data (for continuous entry bonds) and fiscal year 2007 through 2018 data (for single transaction bonds) and concluded that the estimated collection rate would have been significantly higher than the collection rate under its existing bond formulas. However, private sector members of the Commercial Customs Operations Advisory Committee (COAC), which advises the Departments of Homeland Security and Treasury on the commercial operations of CBP, have expressed concern that the proposed supplemental continuous-entry bond formula may result in over-insurance for some importers, which could increase their costs. COAC and CBP also noted that the use of supplemental continuous-entry bonds may require regulatory changes and modifications to CBP's database. In December 2019, the COAC reported that CBP had agreed to postpone implementing risk-based bonding due to the technology and policy concerns. To fully address this recommendation, CBP will need to implement a risk-based framework for setting importer bonding amounts based on the potential risk to AD/CV duty collections.

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*Southwest Border Security: CBP Is Evaluating Designs and Locations for Border Barriers but Is Proceeding Without Key Information. GAO-18-614. Washington, D.C.: July 30, 2018.*

**Recommendation:** The Commissioner of CBP should analyze the costs associated with future barrier segments and include cost as a factor in the Impedance and Denial Prioritization Strategy.

**Action Needed:** CBP agreed with this recommendation. CBP officials stated that, after prioritizing locations, CBP conducts detailed cost estimates as part of the acquisitions process. However, as of January 2020, CBP officials stated that this cost information may affect how each project is executed, but that it would not influence how CBP prioritizes various barrier projects. As we have previously reported, organizations should use an integrated approach to the requirements, acquisitions, and budget processes to prioritize needs and allocate resources, so they can optimize return on investment and ensure program affordability. We continue to believe that full implementation of this recommendation would help CBP reach these goals. Border Patrol needs to incorporate its analysis of the costs of future barrier segments, into its process for prioritizing locations for construction of barriers to close this recommendation as fully implemented.

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

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

**Action Needed:** DHS concurred with our recommendation. Since our 2015 report, DHS and HHS developed two documents to guide interagency procedures related to the processing of UAC. Specifically, in April 2018, HHS and DHS established a memorandum of agreement regarding information sharing for UAC. Subsequently, on July 31, 2018, DHS and HHS issued a Joint Concept of Operations to memorialize interagency policies, procedures, and guidelines related to the processing of UAC. However, in February 2020, we reported that DHS and HHS officials indicated that, in practice, the agencies have not resolved long-standing differences in opinion about whether and how agencies are to share information, and what type of information is needed to inform decisions about the care and placement of UAC. In commenting on our draft report, DHS stated that its components are working with HHS to document current information sharing practices, to validate remaining information sharing gaps, and to draft a joint plan between DHS and HHS to ensure that HHS receives information needed to make decisions for UAC. In their comments, HHS officials stated that they intend to reach out to counterparts at DHS in June 2020 to discuss potential periodic updates to the Joint Concept of Operations. To fully address the recommendation, DHS and HHS should ensure that they have implemented procedures aimed at improving the efficiency and accuracy of the interagency UAC referral and placement process.

In its fiscal year 2021 budget justification, DHS acknowledged this recommendation would remain open, pending the findings in GAO's aforementioned February 2020 report.

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### **Transportation Security**

*Transportation Worker Identification Credential: Internal Control Weaknesses Need to Be Corrected to Help Achieve Security Objectives. GAO-11-657. Washington, D.C.: May 10, 2011.*

**Recommendation:** To identify effective and cost-efficient methods for meeting Transportation Worker Identification Credential (TWIC) program objectives, and assist in determining whether the benefits of continuing to implement and operate the TWIC program in its present form and planned use with readers surpass the costs, we recommend that the Secretary of Homeland Security conduct an effectiveness assessment that includes addressing internal control weaknesses and, at a minimum, evaluates whether use of TWIC in its present form and planned use with readers would enhance the posture of security beyond efforts already in place given costs and program risks.

**Action Needed:** DHS agreed with the recommendation. DHS, through the Transportation Security Administration (TSA), has taken steps to address this recommendation by having an

internal controls assessment conducted of the TWIC program's enrollment, background checking, credential issuance, and continued eligibility review. In February 2018, TSA, with assistance from DHS's Science and Technology (DHS S&T) Directorate, further initiated a study with a Homeland Security Operational Analysis Center to conduct an assessment of the TWIC program's security effectiveness in the maritime environment. The study resulted in a 2019 report titled *The Risk Mitigation Value of the Transportation Worker Identification Credential: A Comprehensive Security Assessment of the TWIC Program*. A copy of the report was recently provided to GAO for review.

We reviewed the report to determine whether it adequately addressed the remaining part of our recommendation and have reached out to officials at TSA, Coast Guard, and DHS S&T. Our assessment of the report identified that DHS has made progress towards addressing our recommendation. For example, the assessment includes an evaluation of varying credentialing alternatives that could be used in implementing the TWIC program. The study further reports on a number of benefits and costs to be expected by implementing the TWIC program with readers. However, the report does not identify how data specific to assigned facility risk categories were updated to correct for previous shortfalls in assessing security benefits. In addition, the reported information does not convey an assessment of the operational costs and security implications of requiring use of TWIC with readers at the highest risk facilities based on potential TWIC-reader implementation and use requirements. This is of particular importance for evaluating the TWIC program's use and effectiveness.<sup>8</sup> Absent this information, including how data on this topic were collected and used to inform the assessment, we cannot affirm that the assessment appropriately addresses our recommendations.

TSA, Coast Guard, and DHS S&T have reported that they are working to respond to our request for additional information. We will assess the information provided in consideration of recommendation closure once received.

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*Aviation Security: TSA Improved Covert Testing but Needs to Conduct More Risk-Informed Tests and Address Vulnerabilities. GAO-19-374. Washington, D.C.: April 4, 2019.*

**Recommendation:** The Administrator of TSA should develop processes for conducting and reporting to relevant stakeholders a comprehensive analysis of covert test results collected by TSA headquarters officials and TSA officials at airports to identify vulnerabilities in screener performance and common root causes contributing to screener test passes and failures.

**Action Needed:** DHS concurred with this recommendation. In response, it undertook a review of its covert test program, and found that test results collected by TSA headquarters officials and TSA officials at airports were not reliable for national-level analysis. Officials subsequently developed a new covert testing process known as Index Testing, to collect high-quality covert testing results from a selection of airports, and to conduct analysis of these results to identify detection rates for certain threat items over time and to better understand the root causes of test failures. As of March 2020, TSA had implemented Index Testing, and had collected and

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<sup>8</sup>See [GAO-13-198](#), *Transportation Worker Identification Credential: Card Reader Pilot Results Are Unreliable; Security Benefits Need to Be Reassessed* (Washington, D.C.: May 8, 2013), for additional information on this and related topics.



analyzed data from the first quarter of testing. We will continue to monitor TSA's efforts to finalize its analysis and reporting of Index Testing results in response to this recommendation.

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*Critical Infrastructure Protection: Actions Needed to Address Significant Weaknesses on TSA's Pipeline Security Program Management. GAO-19-48. Washington, D.C.: December 18, 2019.*

**Recommendation:** The TSA Administrator should develop a strategic workforce plan for its Security Policy and Industry Engagement's Surface Division, which could include determining the number of personnel necessary to meet the goals set for its Pipeline Security Branch, as well as the knowledge, skills, and abilities, including cybersecurity, that are needed to effectively conduct Corporate Security Reviews (CSR) and Critical Facility Security Reviews (CFSR).

**Action Needed:** DHS concurred with this recommendation and stated that TSA will develop a strategic workforce plan for the division, which includes determining the number of personnel necessary to meet the goals set for the Pipeline Security Branch, as well as the knowledge, skills, and abilities, including cybersecurity, that are needed to effectively conduct CSRs and CFSRs. As of February 2020, DHS reported that TSA had not initiated action on this recommendation due to work addressing other GAO recommendations related to pipeline security. We will continue to monitor the status of any efforts to develop a strategic workforce plan in response to this recommendation.

**High Risk Area:** Ensuring the Cybersecurity of the Nation

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**Director:** Nick Marinos, Information Technology and Cybersecurity

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### **Infrastructure and Management**

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

**Recommendations:** The Secretary of Homeland Security should work jointly with the Administrator of the General Services Administration (GSA) to:

- conduct a comprehensive needs assessment and gap analysis of current and needed capabilities and an alternatives analysis that identifies the costs and benefits of leasing and construction alternatives, and
- update cost and schedule estimates for the remaining portions of the consolidation project and viable alternatives.

**Action Needed:** DHS and GSA agreed with the two recommendations. To fully implement the recommendations, DHS and GSA should complete a comprehensive needs assessment, a costs and benefits analysis, and updated cost and schedule estimates taking into consideration new Administration priorities and budget circumstances. After validating the revised

consolidation plan, DHS and GSA should submit their findings to Congress in accordance with the Department of Homeland Security Headquarters Consolidation Accountability Act of 2015.<sup>9</sup> DHS and GSA are currently drafting a revised consolidation plan per our recommendations, and officials expect that the final plan will be completed and approved by summer 2020. GAO concurs with the status of this recommendation as reported by DHS in its fiscal year 2021 budget justification.

**High Risk Area:** Managing Federal Real Property

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**Director:** David C. Trimble, Physical Infrastructure

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*Coast Guard: Actions Needed to Close Stations Identified as Overlapping and Unnecessarily Duplicative. GAO-18-9. Washington, D.C.: October 26, 2017.*

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

**Action Needed:** DHS agreed with this recommendation and stated that it continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. DHS, through the Coast Guard, stated that it would complete additional analyses of its stations in early 2018, with changes to operations expected to begin in the fall of 2018. However, as of December 2019, the Coast Guard has not taken steps to address this recommendation. To fully implement these recommendations, the Coast Guard should establish a plan with target dates for closing boat stations that it determined provide overlapping search and rescue coverage and are unnecessarily duplicative.

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

**Action Needed:** DHS agreed with this recommendation and stated that once analyses and plans and target dates were complete, it would solicit and incorporate feedback and begin implementing changes in the fall of 2018. However, as of December 2019, no stations have been closed. DHS, through the Coast Guard, should close the boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

**Director:** Nathan J. Anderson, Homeland Security and Justice

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

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

**Action Needed:** In February 2019, we recommended that the Coast Guard employ models for its shore infrastructure asset lines to predict the outcome of investments, analyze trade-offs, and

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<sup>9</sup>Pub. L. No. 114-150, 130 Stat. 366 (2016).

optimize decisions among competing investments. Employing models to predict the future condition and performance of facilities could potentially identify and achieve cost savings, according to leading practices. The Coast Guard agreed with our recommendation, but, as of January 2020, had not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternatives to identify a preferred solution to recommend for implementation and estimated that it will complete this at the end of December 2020.

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## Cybersecurity

*Cybersecurity: DHS's National Integration Center Generally Performs Required Functions but Needs to Evaluate Its Activities More Completely. GAO-17-163. Washington, D.C.: February 1, 2017.*

**Recommendations:** To more fully address the requirements identified in the National Cybersecurity Protection Act of 2014 and the Cybersecurity Act of 2015, we recommended that the Secretary of Homeland Security should:

- develop metrics for assessing adherence to applicable principles in carrying out statutorily required functions, and
- establish methods for monitoring the implementation of cybersecurity functions against the principles on an ongoing basis.

**Action Needed:** DHS agreed with the recommendations and has taken the initial steps to address them. Specifically, DHS stated that it continues to determine the applicability of key performance indicators and performance targets, which is intended to enable the National Cybersecurity and Communications Integration Center (NCCIC) to assess its effectiveness performing cybersecurity functions in adherence of applicable principles. Specifically, the agency stated that it continues to work towards finalizing Mission Essential Functions and Tasks, and continues to refine applicable program-level measures and metrics. Further, DHS said it is continuing to update NCCIC Strategic Objectives that are intended to align and verify each of the center's goals and reestablish performance reviews to ensure mission effectiveness. Once we receive evidence that these actions have been taken, we will assess the extent to which they address the recommendations.

**High Risk Area:** Ensuring the Cybersecurity of the Nation

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

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

**Action Needed:** In written comments, DHS concurred with the recommendation in our report and stated that the department will continue to work closely with its private sector partners to ensure framework adoption is a priority and to better understand the extent of framework adoption and barriers to adoption by entities across their respective sectors. As of January 2020, the department had begun taking steps to develop methods to determine the level and

type of framework adoption in the respective sectors. Specifically, in October 2019, DHS, in coordination with its Information Technology (IT) sector partner, administered a survey to all small and mid-sized IT sector organizations to gather information on, among other things, framework use and plans to report on the results in 2020. DHS officials stated that any small or mid-sized business across all critical infrastructure sectors could complete the survey and that the department had promoted the survey to all sectors. In addition, DHS reported in its budget justification that the agency continues to make progress in implementing the recommendation. While the department has ongoing initiatives, implementing our recommendations to gain a more comprehensive understanding of the framework's use by critical infrastructure sectors is essential to the success of protection efforts.

**High Risk Area:** Ensuring the Cybersecurity of the Nation

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*Cybersecurity Workforce: Agencies Need to Accurately Categorize Positions to Effectively Identify Critical Staffing Needs. GAO-19-144. Washington, D.C.: March 12, 2019.*

**Recommendation:** The Secretary of Homeland Security should take steps to review the assignment of the "000" code to any positions in the department in the 2210 IT management occupational series, assign the appropriate National Initiative for Cybersecurity Education (NICE) framework work role codes, and assess the accuracy of position descriptions.

**Action needed:** DHS concurred with our recommendation. DHS conducted an audit of its components' cybersecurity coding efforts in fiscal year 2018 and identified actions that components needed to take to complete the assignment of appropriate NICE framework work role codes and assess the accuracy of position descriptions; a second audit for fiscal year 2019 is underway, and the department expects to complete its coding efforts by June 2020. As of January 2020, DHS has not yet provided sufficient evidence to demonstrate that it has implemented this recommendation. To fully implement this recommendation, DHS will need to provide evidence that it has assigned appropriate NICE framework work role codes to its positions in the 2210 IT management occupational series and assessed the accuracy of position descriptions.

**High-Risk area:** Ensuring the Cybersecurity of the Nation

**Director:** Carol C. Harris, Information Technology and Cybersecurity

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

**Recommendation:** The Secretary of Homeland Security should develop a cybersecurity risk management strategy that includes the key elements identified in this report.

**Action Needed:** DHS concurred with our recommendation. In January 2020, the department stated that it is in the process of developing an enterprise-wide Cybersecurity Risk Management Strategy that will define cybersecurity risk tolerance thresholds and promote inclusion of cybersecurity risk management into the department's overall risk management capabilities. DHS estimated that it would finalize the strategy by July 31, 2020. To fully implement this recommendation, DHS needs to establish a risk management strategy that includes the key elements identified in our report.

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

**Action Needed:** DHS concurred with our recommendation. In January 2020, the department stated that its Cybersecurity Risk Management Strategy will clarify the cybersecurity risk executive's role, and will be coordinated with other DHS offices responsible for risk management, as appropriate. DHS estimated that it would finalize these actions by July 31, 2020. To fully implement this recommendation, DHS needs to establish and document its process for coordination between these two functions.

**High Risk Area:** Ensuring the Cybersecurity of the Nation

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## **Chemical and Nuclear Security**

*Chemical Terrorism: A Strategy and Implementation Plan Would Help DHS Better Manage Fragmented Chemical Defense Programs and Activities. GAO-18-562. Washington, D.C.: August 22, 2018.*

**Recommendation:** The Assistant Secretary for Countering Weapons of Mass Destruction (CWMD) should develop a strategy and implementation plan to help the Department of Homeland Security, among other things, guide, support, integrate and coordinate its chemical defense programs and activities; leverage resources and capabilities; and provide a roadmap for addressing any identified gaps.

**Action Needed:** CWMD officials provided GAO with the completed strategy in December 2019 and plan to complete the implementation plan by September 30, 2020.

GAO concurs with the status of this recommendation as reported by DHS in its fiscal year 2021 budget justification.

**Director:** Christopher P. Currie, Homeland Security and Justice

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*Nuclear Security: CBP Needs to Take Action to Ensure Imported Radiological Material Is Properly Licensed. GAO-18-214. Washington, D.C.: January 10, 2018.*

**Recommendation:** The Commissioner of CBP should develop a monitoring system to help ensure that CBP officials comply with license verification policies and procedures for imported radiological material.

**Action Needed:** CBP agreed with our recommendation and said they would complete their corrective actions by April 30, 2020. To fully implement it, CBP should develop a monitoring system that observes agency verification of licenses for imported radiological materials to ensure CBP officials are complying with existing policies and procedures.

**Recommendation:** The Commissioner of CBP should develop a system that better identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments.

**Action Needed:** CBP agreed with our recommendation and said they would complete their corrective actions by April 30, 2020. To fully implement it, CBP should develop a system to better identify which shipments of radiological material pose the greatest risk and revise their policies and procedures for verification of the licenses for these shipments accordingly.

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