



**Testimony** 

Before the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

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### **COAST GUARD**

# Actions Needed to Improve Mission Execution and Resource Management

Statement of Heather MacLeod, Director, Homeland Security and Justice

Accessible Version

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### **GAO Highlights**

Highlights of GAO-23-106852, a testimony before the Subcommittee on Coast Guard and Maritime Transportation, Committee on Transportation and Infrastructure, House of Representatives

Why GAO Did This Study

The U.S. Coast Guard, a branch of the armed forces located within the Department of Homeland Security (DHS), is responsible for protecting and defending more than 100,000 miles of U.S. coastline and inland waterways. It safeguards an economic region covering 4.5 million square miles. To carry out its missions, the Coast Guard must use its resources in a manner that allows it to maintain capabilities needed to execute its missions and make necessary investments for the future while operating within its existing resources.

This statement discusses GAO's prior work identifying additional areas where the Coast Guard could improve mission execution and better manage its resources.

This statement is based primarily on eight reports published from February 2019 to November 2022. For that work, GAO analyzed Coast Guard documents and interviewed agency officials.

### What GAO Recommends

GAO made 39 recommendations to the Coast Guard in the reports covered by this statement. As of June 2023, the Coast Guard has addressed seven of the 39 recommendations, and 32 remain unaddressed. GAO continues to monitor the Coast Guard's progress in addressing them.

View GAO-23-106852. For more information, contact Heather MacLeod at (202) 512-8777 or macleodh@gao.gov.

### June 21, 2023

### **COAST GUARD**

### Actions Needed to Improve Mission Execution and Resource Management

### What GAO Found

The Coast Guard—a multi-mission, maritime military service—has various authorities that enables it to conduct its statutory missions. Ensuring that the Coast Guard collects, uses, and reports complete and accurate information to manage its missions is critical to the Coast Guard's ability to meet its mission demands and efficiently manage resources. While the Coast Guard has taken steps to more effectively carry out its missions, GAO's recent work identified specific actions the Coast Guard could take to improve mission execution and better manage resources. For example:

- Collect better vessel accident information. In March 2021, GAO reported that the Coast Guard has the authority to collect more information on marine accidents, which could help it assess the efficacy of lifesaving equipment and improve marine safety. GAO recommended that the Coast Guard revise its vessel accident investigations guidance to require Coast Guard investigators to collect information on the date of birth, known disability, and use of lifesaving equipment of people in vessel accidents. According to Coast Guard officials, without statutory or regulatory requirements, the Coast Guard does not intend to collect the additional information unless it is necessary to determine causal factors of a vessel accident or personnel casualty. GAO maintains this recommendation is important because without this information, the Coast Guard cannot fully assess the efficacy of lifesaving equipment that could help it identify opportunities to improve marine safety.
- Collect and assess information related to gas carrier examinations. In January 2022, GAO reported that the Coast Guard is required to conduct annual examinations of gas carriers; however, it faces a shortage of marine inspectors, which can lead to examination delays, according to industry representatives. GAO recommended that the Coast Guard assess the benefits and risks of adopting a risk-based approach for conducting gas carrier compliance exams and take actions to address the results, as appropriate and feasible. As of February 2023, the Coast Guard started an information collection study to assess the effectiveness of a risk-based approach to the examinations. Such actions should help ensure that the Coast Guard is efficiently and effectively using its marine inspection resources.
- Report shore infrastructure information more completely and accurately. In February 2019, GAO reported that the Coast Guard had not provided complete information to Congress about its funding needs for shore infrastructure. For example, it did not describe trade-offs among competing shore infrastructure projects, and the impacts on mission execution from shore facilities in disrepair. GAO recommended that the Coast Guard include supporting details about competing project alternatives and report trade-offs in congressional budget requests and related reports. The Coast Guard agreed with GAO's recommendation, but noted challenges with addressing it. GAO maintains this recommendation is important because without such information about Coast Guard budgetary requirements, Congress does not have critical information that could help to prioritize funding to address the Coast Guard's shore infrastructure needs.

Chairman Webster, Ranking Member Carbajal, and Members of the Subcommittee:

Thank you for the opportunity to discuss our work on the U.S. Coast Guard. The Coast Guard—a multi-mission, maritime military service within the Department of Homeland Security (DHS)—is responsible for conducting 11 statutory missions, such as marine safety and ports, waterways, and coastal security.¹ Coast Guard personnel are responsible for protecting and defending more than 100,000 miles of U.S. coastline and inland waterways, and safeguarding an economic region covering 4.5 million square miles. To carry out its missions, the Coast Guard must use its resources in a manner that allows it to maintain capabilities needed to execute its missions and make necessary investments for the future while operating within its existing resources.

My statement today discusses our prior work that identified areas where the Coast Guard could further improve upon its efforts to carry out its mission and better manage its resources. This statement is based primarily on eight reports published from February 2019 to November 2022 related to the Coast Guard. It also includes selected updates to those reports as of June 2023 regarding Coast Guard efforts to address our previous recommendations. For these products and our selected updates, we analyzed Coast Guard documentation and interviewed agency officials.

We made 39 recommendations to the Coast Guard in the reports covered by this statement. As of June 2023, the Coast Guard has taken action to fully address seven of the 39 recommendations, and 32 remain unaddressed. GAO continues to monitor the Coast Guard's progress in addressing them.

More detailed information on the objectives, scope, and methodology for our work can be found in the issued reports listed in Related GAO Products at the conclusion of this statement. We conducted the work upon which this statement is based in accordance with generally accepted government auditing standards. Those standards require that

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<sup>&</sup>lt;sup>16</sup> U.S.C. § 468(a). For further information on the Coast Guard's 11 missions, see appendix I. By statute, the Coast Guard is at all times a military service and branch of the armed forces. It is required to maintain a state of readiness, including when functioning as a specialized service in the Navy in time of war or when directed by the President. See 14 U.S.C.§§ 101-103.

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.

# Improvements Needed to More Effectively Execute Missions and Manage Resources

While the Coast Guard has taken steps to more effectively execute its missions, we have identified several specific areas in our recent work where the Coast Guard could improve its information collection, use, and reporting efforts and better manage resources. Such improvements to mission execution are critical to the Coast Guard's ability to meet demands while operating within its existing resources.

Collect and assess information related to gas carrier **examinations.** Gas carrier ships that transport liquefied natural gas and other products can pose safety and environmental risks because the cargo is highly combustible. In January 2022, we reported on challenges associated with the Coast Guard's examinations of gas carriers.<sup>2</sup> Specifically, we found that the Coast Guard faces a shortage of marine inspectors in key sectors that conduct compliance exams for gas carriers, which can lead to examination delays. Representatives from six of nine gas carrier industry stakeholders told us that they sometimes experienced delays because the Coast Guard did not have gas carrier examiners available to conduct a compliance exam on their vessel. Coast Guard officials told us that because there have been no serious accidents involving gas carriers at U.S. ports, lowering the frequency of compliance exams would help address this challenge and free up resources to focus inspections on riskier vessels. However, the Coast Guard is statutorily required to conduct annual compliance exams for gas carriers, regardless of risk. Therefore, any changes to the frequency of the compliance exams

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<sup>&</sup>lt;sup>2</sup>GAO. COAST GUARD: Assessment of a Risk-Based Approach for Conducting Gas Carrier Exams is Needed GAO-22-105432 (Washington, D.C.: January 12, 2022).

would require a change in current law.<sup>3</sup> The Coast Guard previously considered collecting information to assess the benefits and risks of reducing the frequency of exams but did not complete this effort.

We recommended that the Coast Guard conduct an assessment of the benefits and risks of adopting a risk-based approach for conducting gas carrier compliance exams and take actions to address the results, as appropriate and feasible. In February 2023, the Coast Guard told us that it had entered into contract with the National Academies of Science, Engineering, and Medicine to assess the effectiveness of adopting a risk-based approach to gas carrier examinations and that the study was underway. These actions to collect and effectively use information are consistent with our recommendation. Once completed, these actions should help the Coast Guard determine whether any changes to its authorities are appropriate and ensure that the Coast Guard is efficiently and effectively using its marine inspection resources.

• Fully implement statutory safety requirements for fishing vessels. Commercial fishing has one of the highest industry death rates in the U.S., according to the U.S. Bureau of Labor Statistics. Coast Guard efforts to promote commercial fishing vessel safety include conducting dockside exams, engaging with industry, and collaborating with other federal agencies. Since fiscal year 2011, Congress has enacted multiple safety requirements for commercial fishing vessels. These requirements directed the Coast Guard to take specific actions related to commercial fishing vessel safety, such as issuing regulations, and established vessel safety requirements that the agency has the authority to enforce. In November 2022, we found that the Coast Guard had fully implemented five of the 21 key statutory requirements related to commercial fishing vessel safety that were enacted from fiscal years 2011 through 2021.4 However, it had

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<sup>&</sup>lt;sup>3</sup>See 46 U.S.C. § 3714. While conducting risk-based gas carrier compliance exams could generate efficiencies, the Coast Guard has also recognized potential consequences of such an approach. Because of the combustible nature of their contents, gas carriers pose safety and environmental risks, and a safety incident or accident could have dire consequences.

<sup>&</sup>lt;sup>4</sup>At the time of our November 2022 report, the Coast Guard was required to implement 22 statutory requirements related to commercial fishing vessel safety and had partially or not implemented 17 of the 22 requirements. However, since our report, one of the statutory requirements Coast Guard had not implemented was repealed. See Pub. L. No. 117-263, div. K, tit. CXV, § 11509(a)(3), 136 Stat. 2395, 4137 (2022). See GAO. COAST GUARD: Additional Actions Needed to Improve Commercial Fishing Vessel Safety Efforts, GAO-23-105289 (Washington, D.C.: November 2, 2022).

partially or not implemented the remaining 16 requirements.

We also found that the Coast Guard has established strategic goals and performance goals for its safety program for commercial fishing vessels. However, it has not fully incorporated other key performance management practices, such as establishing performance goals that fully address all aspects of its strategic goals, setting realistic targets for its performance goals, and using performance data to assess progress towards program goals.

We recommended that the Coast Guard develop a plan with time frames and interim milestones to fully implement the other outstanding statutory requirements. As of June 2023, we are waiting for additional information from the Coast Guard about their planned efforts to address this recommendation. Fully incorporating such practices could help the Coast Guard better assess program performance and address any performance issues.

• Verify vessel response plan information. The Coast Guard has the authority to verify certain information in vessel response plans, which could improve marine safety and environmental protection. Tankers and other large vessels are required to develop vessel response plans that identify contracts in place for response resource providers, such as oil spill removal, and salvage and marine firefighting services. These plans help ensure that vessel owners and operators are prepared to respond in a timely manner of a marine incident to protect lives, property, and the environment. In September 2020, we reported on Coast Guard efforts to assess the regulatory compliance of vessel response plans.<sup>5</sup>

Specifically, we found that while the Coast Guard has processes to assess vessel response plans, officials stated that their efforts do not include verifying certain aspects of response resources in their plan reviews. For example, the Coast Guard does not verify information about the location and capability of equipment, which could help determine whether the vessel owners have engaged response resources that are able to be responsive when called upon. Coast Guard officials stated that they have authority to do more to verify response resource capability and availability. For example, they noted

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<sup>&</sup>lt;sup>5</sup>GAO: COAST GUARD: Improved Analysis of Vessel Response Plan Use Could Help Mitigate Marine Pollution Risk GAO-20-554 (Washington, D.C.: September 29, 2020).

the Coast Guard could conduct verifications to validate the vessel owner's certification regarding response resource providers.<sup>6</sup>

To improve its assessments, we recommended that the Coast Guard establish a process to analyze incidents where vessel response plans have been activated to determine whether or how the Coast Guard should improve its review processes—including its approach to verifying plan information, contracts, and the quality of data used in review processes. In February 2022, Coast Guard officials indicated that they were in the process of evaluating potential tools to establish ways of gathering information from real-world incidents and exercises involving vessels with a vessel response plan. They stated that they anticipated such tools and information would help confirm the adequacy of resources and identify potential deficiencies in vessel response plans that may need to be addressed by the vessel owner or operator.

In April 2023, Coast Guard officials told us that the agency is in the final stages of revising its Marine Environmental Response and Preparedness Manual to reflect these changes. Officials estimated that the new version of the manual will likely be promulgated by September 2023. Developing a process for more thoroughly analyzing incident data to identify whether or how its review processes for vessel response plans should be strengthened could help the Coast Guard mitigate the risks identified in the review processes and provide greater assurance of vessel response plan effectiveness.

• Collect better vessel accident information. The Coast Guard has the authority to collect more information on marine accidents, which could help it assess the efficacy of lifesaving equipment and improve marine safety. In March 2021, we reported that the Coast Guard's vessel accident investigators are not required to collect information on passengers' dates of birth or potential disabilities, or its use of lifesaving equipment, when conducting their investigations. However, Coast Guard officials told us that collecting this information could help the service assess risk and identify opportunities for regulatory changes or issuing safety bulletins to improve marine safety.

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<sup>&</sup>lt;sup>6</sup>The regulations identify 15 selection criteria that vessel owners are to consider when determining the adequacy of salvage and marine firefighting response resource providers included in their plans and they are required to certify in their plans that they considered those factors when choosing their response resource providers. 33 C.F.R. § 155.4050.

<sup>&</sup>lt;sup>7</sup>GAO. COAST GUARD: More Information Needed to Assess Efficacy and Costs of Vessel Survival Craft Requirements GAO-21-247 (Washington, D.C.: March 31, 2021).

Moreover, the Coast Guard Authorization Act of 2016 requires that the Coast Guard report every 5 years on the number of casualties from water immersion involving people with disabilities, children, and the elderly, and what impact the carriage of out-of-water survival craft has on improving their survivability.<sup>8</sup>

We recommended that the Coast Guard revise its guidance for investigating vessel accidents to require investigators to collect date of birth, known disability, and use of lifesaving equipment of people in vessel accidents. DHS did not concur with our recommendation, noting that Coast Guard investigators are not required by statute or regulation to collect this information. In addition, DHS noted that investigators already collect this information on a case-by-case basis when it is needed for a specific investigative purpose, such as to determine causal factors of a vessel accident or personnel casualty. However, we maintain that not having of statutory or regulatory requirements does not prevent the Coast Guard from issuing requirements for its investigators to collect this information. For example, the Coast Guard routinely issues guidance to its personnel to take certain actions—such as through Commandant Instructions and Tactics, Techniques, and Procedures—and these requirements are not all outlined in statute and regulation. As of April 2023, DHS's position remained unchanged; we continue to follow up with the department on actions the Coast Guard may take in the future in response to our recommendation. By not collecting this information, the Coast Guard cannot fully assess the efficacy of lifesaving equipment.

Identify workforce needs. The Coast Guard has conducted limited assessments of its workforce needs, which could help inform its recruiting goals. For example, in February 2020 we reported that since the Coast Guard began using its workforce requirements determination process in 2003, it has assessed only a 6 percent of its workforce needs.<sup>9</sup> We made four recommendations to the Coast Guard which addressed limitations with Coast Guard's workforce requirements determination process. As of April 2023, the Coast

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<sup>&</sup>lt;sup>8</sup>Pub. L. No. 114-120, tit. III, § 301(b)(1)(A), (C)(ii), (3), 130 Stat. 27, 50-51 (2016) (as amended by Pub. L. No. 114-328, tit. XXXV, subtit. A, § 3503(a), 130 Stat. 2000, 2775 (2016)).

<sup>&</sup>lt;sup>9</sup>The Coast Guard's manpower requirements determination process is its preferred method for determining workforce needs because it identifies the workforce needed to conduct required mission activities. See GAO. COAST GUARD: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs GAO-20-223 (Washington, D.C.: February 26, 2020).

Guard implemented three of these recommendations by updating its guidance, determining necessary personnel to conduct the workforce determination process, and tracking the extent to which it completed this process for its units. However, as of May 2023, it had not determined time frames and milestones to fully implement its workforce requirements plan. Fully addressing this recommendation will help ensure that the Coast Guard has the right number of people with the right set of skills to meet its mission demands.

With respect to its cyberspace workforce needs, in September 2022, we found that because the Coast Guard had not determined necessary staffing levels and skills to meet mission needs, it was not positioned to fully understand the resources such a workforce requires. However, the Coast Guard is increasingly dependent upon its cyberspace workforce to maintain and protect its information systems and data from threats. We recommended that the Coast Guard take six actions, including to determine the cyberspace staff needed to meet its mission demands and fully implement five recruitment and retention leading practices, such as establishing a strategic workforce plan for its cyberspace workforce.

As of March 2023, Coast Guard officials noted that they are in various stages of taking actions to address the recommendations. Fully addressing these recommendations could help the Coast Guard better understand the resources it requires, including those to protect its information systems and data from threats.

• Ensure certain technology is inventoried and has appropriate cyber controls. Historically, the Coast Guard has had longstanding issues managing its technology resources, yet it relies extensively on IT systems and services to carry out its 11 statutory missions. It also relies on operational technology, which encompasses a broad range of programmable systems or devices that interact with the physical environment, such as sensors and radar. In July 2022, we found that the Coast Guard did not consistently apply a process to ensure cyber controls were in place for all types of its operational technology, due in part to not having a comprehensive and accurate inventory of these technologies.<sup>11</sup> According to Coast Guard officials, the inventory does not include all of the Coast Guard's operational technology due to

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<sup>&</sup>lt;sup>10</sup>GAO. COAST GUARD: Workforce Planning Actions Needed to Address Growing Cyberspace Mission Demands GAO-22-105208 (Washington, D.C.: September 27, 2022).

<sup>&</sup>lt;sup>11</sup>GAO. COAST GUARD: Actions Needed to Enhance IT Program Implementation GAO-22-105092 (Washington, D.C.: July 28, 2022).

resource constraints.

We made three recommendations to the Coast Guard to (1) establish a comprehensive and accurate inventory of all operational technology; (2) develop a plan or strategy to ensure that appropriate cyber controls are identified and applied for all types of operational technology; and (3) ensure that the plan is effectively implemented. As of January 2023, the Coast Guard reported that it is in various stages of taking actions to address the recommendations. Ensuring that it has adequate cybersecurity measures in place for all its systems could help the Coast Guard manage risks of unauthorized access to those systems or devices, potentially leading to system disruptions and loss of data.

• Report shore infrastructure information more completely and accurately. In February 2019, we found that the Coast Guard could increase budget transparency for shore infrastructure. 12 Specifically, we found that the Coast Guard's budget requests (1) had not clearly identified funding allotted for routine shore infrastructure maintenance needs, and (2) had not generally addressed deferred maintenance and repair deficiencies, resulting in increases to its backlogs. In addition, the Coast Guard had not included information in its Unfunded Priorities Lists and other related reports that clearly articulated trade-offs among competing project alternatives, as well as the impacts on missions conducted from shore facilities in disrepair. This information could help to inform decision makers of the risks posed by untimely investments in maintenance and repair backlogs.

We also found that the Coast Guard budget requests had not been aligned with its requirements-based budget targets for shore infrastructure. According to the Coast Guard, a requirements-based budget is an estimate of the cost to operate and sustain its shore infrastructure portfolio of assets over the life cycle of the asset, from initial construction or capital investment through divestiture or demolition. We found that Coast Guard targets for recapitalization of shore assets exceeded \$290 million annually. However, its budget requests for fiscal years 2012 through 2021 ranged from about \$5 million to about \$99 million annually. Notwithstanding the mismatch between Coast Guard budget requests and its requirements-based budget targets, Coast Guard's allotments for this area for years 2016

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<sup>&</sup>lt;sup>12</sup>GAO. COAST GUARD SHORE INFRASTRUCTURE: Applying Leading Practices Could Help Manage Project Backlogs Of At Least \$2.6 Billion, GAO-19-82 (Washington, D.C.: February 21, 2019).

through 2018 exceeded the Coast Guard's requests. For example, in fiscal year 2016, the Coast Guard's allotment of \$130 million was almost three times the nearly \$47 million requested. In 2018, the almost \$45 million allotted was more than four times the \$10 million requested.

We recommended that the Coast Guard include supporting details about competing project alternatives and report trade-offs in congressional budget requests and related reports. The Coast Guard agreed with our recommendation, but noted that addressing this recommendation is challenging due to limitations imposed by the Office of Management and Budget and DHS. As of May 2023, the Coast Guard was working toward publishing some related information on its website, according to officials. Without such information about Coast Guard budgetary requirements, Congress will lack critical information that could help to prioritize funding to address the Coast Guard's shore infrastructure backlogs.

In closing, by taking action in these areas Coast Guard could improve mission execution and better manage its resources.

Chairman Webster, Ranking Member Carbajal, and Members of the Subcommittee, this completes my prepared statement. I would be pleased to respond to any questions that you may have at this time.

### **GAO Contact and Staff Acknowledgements**

If you or your staff have any questions about this testimony, please contact Heather MacLeod, Director, Homeland Security and Justice at (202)-512-8777 or macleodh@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. GAO staff who made key contributions to this statement are Andrew Curry (Assistant Director), Julia Vieweg (Analyst-in-Charge), Jewel Conrad, Nasreen Badat, Elizabeth Dretsch, Tracey King, and Janet Temko-Blinder.

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# Appendix I: Information on the U.S. Coast Guard's 11 Missions

This appendix details the U.S. Coast Guard's 11 missions (see table 1).

Mission	Description
Aids to Navigation	Mitigate the risk to safe navigation by providing and maintaining more than 51,000 buoys, beacons, lights, and other aids to mark channels and denote hazards.
Defense Readiness	Maintain the training and capability necessary to immediately integrate with Department of Defense forces in both peacetime operations and during times of war.
Drug Interdiction	Stem the flow of illegal drugs into the United States.
Ice Operations	Establish and maintain tracks for critical waterways, assisting and escorting vessels beset or stranded in ice, and remove navigational hazards created by ice in navigable waterways.
Living Marine Resources	Enforce laws governing the conservation, management, and recovery of living marine resources, marine protected species, and national marine sanctuaries and monuments.
Marine Environmental Protection	Enforce laws which deter the introduction of invasive species into the maritime environment, stop unauthorized ocean dumping, and prevent and respond to oil and chemical spills.
Marine Safety	Enforce laws which prevent death, injury, and property loss in the marine environment.
Migrant Interdiction	Stem the flow via maritime routes of unlawful migration and human smuggling activities.
Other Law Enforcement	Enforce international treaties, including the prevention of illegal fishing in international waters and the dumping of plastics and other marine debris.
Ports, Waterways, and Coastal Security	Ensure the security of the waters subject to the jurisdiction of the United States and the waterways, ports, and intermodal landside connections that comprise the marine transportation system—and protect those who live or work on the water or who use the maritime environment for recreation.
Search and Rescue	Search for, and provide aid to, people who are in distress or imminent danger.

Source: 6 U.S.C. § 468(a); GAO summary of Coast Guard information. | GAO-23-106852

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### Related GAO Products

COAST GUARD: Additional Actions Needed to Improve Commercial Fishing Vessel Safety Efforts, GAO-23-105289 (Washington, D.C.: November 2, 2022).

COAST GUARD: Workforce Planning Actions Needed to Address Growing Cyberspace Mission Demands, GAO-22-105208 (Washington, D.C.: September 27, 2022).

COAST GUARD: Actions Needed to Enhance IT Program Implementation, GAO-22-105092 (Washington, D.C.: July 28, 2022).

COAST GUARD: Assessment of a Risk-Based Approach for Conducting Gas Carrier Exams is Needed, GAO-22-105432 (Washington, D.C.: January 12, 2022).

COAST GUARD: Enhancements Needed to Strengthen Marine Inspection Workforce Planning Efforts, GAO-22-104465 (Washington, D.C.: January 12, 2022).

COAST GUARD: More Information Needed to Assess Efficacy and Costs of Vessel Survival Craft Requirements, GAO-21-247 (Washington, D.C.: March 31, 2021).

COAST GUARD: Improved Analysis of Vessel Response Plan Use Could Help Mitigate Marine Pollution Risk, GAO-20-554 (Washington, D.C.: September 29, 2020).

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

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).

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