



Report to the Subcommittee on  
Oversight and Management Efficiency,  
Committee on Homeland Security,  
House of Representatives

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September 2018

# HOMELAND SECURITY

Clearer Roles and  
Responsibilities for  
the Office of Strategy,  
Policy, and Plans and  
Workforce Planning  
Would Enhance Its  
Effectiveness

# GAO Highlights

Highlights of [GAO-18-590](#), a report to the Subcommittee on Oversight and Management Efficiency, Committee on Homeland Security, House of Representatives.

## Why GAO Did This Study

GAO has designated DHS management as high risk because of challenges in building a cohesive department. PLCY supports cohesiveness by, among other things, coordinating departmentwide policy and strategy. In the past, however, questions have been raised about PLCY's efficacy. In December 2016, the NDAA codified PLCY's organizational structure, roles, and responsibilities.

GAO was asked to evaluate PLCY's effectiveness. This report addresses the extent to which (1) DHS established an organizational structure and processes and procedures that position PLCY to be effective, (2) DHS and PLCY have ensured alignment of workforce with priorities, and (3) PLCY has engaged relevant component staff to help identify and respond to emerging needs. GAO analyzed the NDAA, documents describing specific responsibilities, and departmentwide policies and strategies. GAO also interviewed officials in PLCY and all eight operational components.

## What GAO Recommends

GAO is making four recommendations. DHS concurred with three recommendations, including that DHS finalize a delegation of authority defining PLCY's roles and responsibilities and develop corresponding processes and procedures. DHS did not concur with a recommendation to apply the *DHS Workforce Planning Guide* to identify and communicate workforce needs. GAO believes this recommendation is valid as discussed in the report.

View [GAO-18-590](#). For more information, contact Chris Currie at (404) 679-1875 or [CurrieC@gao.gov](mailto:CurrieC@gao.gov).

September 2018

## HOMELAND SECURITY

### Clearer Roles and Responsibilities for the Office of Strategy, Policy, and Plans and Workforce Planning Would Enhance Its Effectiveness

## What GAO Found

According to our analysis and interviews with operational components, the Department of Homeland Security's (DHS) Office of Strategy, Policy, and Plans' (PLCY) organizational structure and efforts to lead and coordinate departmentwide and crosscutting strategies—a key organizational objective—have been effective. For example, PLCY's coordination efforts for a strategy and policy executive steering committee have been successful, particularly for strategies. However, PLCY has encountered challenges leading and coordinating efforts to develop, update, or harmonize policies that affect multiple DHS components. In large part, these challenges are because DHS does not have clearly-defined roles and responsibilities with accompanying processes and procedures to help PLCY lead and coordinate policy in a predictable, repeatable, and accountable manner. Until PLCY's roles and responsibilities for policy are more clearly defined and corresponding processes and procedures are in place, situations where the lack of clarity hampers PLCY's effectiveness in driving policy are likely to continue. Development of a delegation of authority, which involves reaching agreement about PLCY's roles and responsibilities and clearly documenting them, had been underway. However, it stalled due to changes in department leadership. As of May 2018, the effort had been revived, but it is not clear whether and when DHS will finalize it.

PLCY does some workforce planning as part of its annual budgeting process, but does not systematically apply key principles of the *DHS Workforce Planning Guide* to help ensure that PLCY's workforce aligns with its and DHS's priorities and goals. According to PLCY officials, the nature of its mission requires a flexible staffing approach. As such, a portion of the staff functions as generalists who can be assigned to meet the needs of different situations, including unexpected changing priorities due to an emerging need. However, shifting short-term priorities requires tradeoffs, which may divert attention and resources from longer-term priorities. As of June 5, 2018, PLCY also had a number of vacancies in key leadership positions, which further limited attention to certain priorities. According to PLCY officials, PLCY recently began a review to identify the office's authorities in the National Defense Authorization Act for Fiscal Year 2017 (NDAA) and other statutes, compare these authorities to the current organization and operations, and address any workforce capacity gaps. Employing workforce planning principles—in particular, systematic identification of workforce demand, capacity gaps, and strategies to address them—consistent with the *DHS Workforce Planning Guide* could better position PLCY to use its workforce as effectively as possible under uncertain conditions and to communicate effectively with DHS leadership about tradeoffs.

Officials from PLCY and DHS operational components praised existing mechanisms to coordinate and communicate at the senior level, especially about strategy, but component officials identified opportunities to better connect PLCY and component staff to improve communication flow about emerging policy and strategy needs. Among the ideas offered by component officials to enhance communication and collaboration were holding routine small-group meetings, creating forums for periodic knowledge sharing, and maintaining accurate and up-to-date contact information for all staff-level stakeholders.

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## Abbreviations

DHS	Department of Homeland Security
ESC	Executive Steering Committee
NDA	National Defense Authorization Act for Fiscal Year 2017
PLCY	Office of Strategy, Policy, and Plans
QHSR	Quadrennial Homeland Security Review
S&P ESC	Strategy and Policy Executive Steering Committee

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September 19, 2018

The Honorable Scott Perry  
Chairman  
The Honorable J. Luis Correa  
Ranking Member  
Subcommittee on Oversight and  
Management Efficiency  
Committee on Homeland Security  
House of Representatives

The Department of Homeland Security (DHS) was established by the Homeland Security Act of 2002 and began operations in 2003.<sup>1</sup> That year, we designated implementing and transforming DHS as high risk because DHS had to transform 22 agencies—several with major management challenges—into one department.<sup>2</sup> Further, failure to effectively address DHS’s management and mission risks could have serious consequences for U.S. national and economic security. Given the significant effort required to build and integrate a department as large and complex as DHS, our initial high-risk designation addressed the department’s implementation and transformation efforts to include associated management and programmatic challenges. We reported that the creation of DHS was an enormous undertaking and successfully transforming large organizations, even those undertaking less strenuous reorganizations, could take years to implement. Over the past 15 years, the focus of this high-risk area has evolved in tandem with DHS’s maturation and evolution. The overriding tenet has consistently remained DHS’s ability to build a single, cohesive, and effective department that is greater than the sum of its parts—a goal that requires effective collaboration and integration of its various components and management functions.

DHS’s Office of Strategy, Policy, and Plans (PLCY)<sup>3</sup> is responsible for some of these management functions, including developing and coordinating departmentwide policies and strategies, conducting analyses

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<sup>1</sup>See Pub. L. No. 107-296, 116 Stat. 2135 (2002), as amended.

<sup>2</sup>GAO, *High Risk Series: An Update*, [GAO-03-119](#) (Washington, D.C.: January 2003).

<sup>3</sup>PLCY officials said they continue to use the acronym PLCY because this was the acronym used when the office was called the Office of Policy.

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for senior leadership, and supporting the Secretary's initiatives.<sup>4</sup> For example, PLCY develops and disseminates departmentwide policies in the form of directives and instructions, strategy documents required by statute, operational plans, and reports for Congress.<sup>5</sup> The National Defense Authorization Act for Fiscal Year 2017 (NDAA), enacted in December 2016, established PLCY in statute.<sup>6</sup> Although largely consistent with the roles and responsibilities of DHS's Office of Policy, as PLCY was named before enactment of the NDAA, implementation of the act required organizational changes designed to respond to certain challenges the office had identified as barriers to its ability to perform effectively.

For a number of years, questions have been raised about the office's efficacy and engagement with key stakeholders, like the DHS operational components.<sup>7</sup> For example, we have reported on challenges related to obtaining stakeholder feedback under the office's leadership of the 2010 and 2014 Quadrennial Homeland Security Reviews (QHRS).<sup>8</sup> We have also reported on opportunities for select components of the office—the Screening Coordination Office and the Office of International Affairs—to implement better management controls to help enhance monitoring and

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<sup>4</sup>According to the *DHS Strategic Planning Guidance, Fiscal Year 2017*, a policy is a directive body of rules intended to set forth the overarching objective of a major initiative or program, and a strategy articulates the vision, goals, objectives, and outcomes that inform key budget, acquisition, and operational activities within the department, specifying the current problem, why the organization is particularly well-suited to address the problem and what the organization needs to do to achieve the desired outcomes.

<sup>5</sup>According to DHS, an operational plan establishes objectives and employment actions using existing resources to achieve a set of outcomes.

<sup>6</sup>See Pub. L. No. 114-328, § 1902, 130 Stat. 2000, 2670 (2016).

<sup>7</sup>The DHS operational components are the Federal Emergency Management Agency, Federal Law Enforcement Training Centers, Transportation Security Administration, U.S. Citizenship and Immigration Services, U.S. Coast Guard, U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, and U.S. Secret Service.

<sup>8</sup>The Implementing Recommendations of the 9/11 Commission Act of 2007 required that beginning in fiscal year 2009 and every 4 years thereafter, the DHS Secretary shall conduct a review that provides a comprehensive examination of the homeland security strategy of the United States. See Pub. L. No. 110-53, § 2401, 121 Stat. 266, 543-46 (2007); 6 U.S.C. § 347. For each review, the Secretary shall delineate and update, as appropriate, the national homeland security strategy, outline and prioritize the full range of the critical homeland security mission areas of the nation, and include an assessment of the organizational alignment of DHS with the homeland security strategy and mission areas, among other things. See 6 U.S.C. § 347(b)(1)-(2), (5).

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accountability for their respective missions.<sup>9</sup> DHS agreed with all of our recommendations in those prior reports.<sup>10</sup>

In light of past concerns about efficacy and the recent statutory changes, you asked us to review how PLCY is contributing to efforts to build a single, cohesive department by driving departmentwide and crosscutting strategy and policy. This report addresses the extent to which (1) DHS has established an organizational structure and processes and procedures that position PLCY to achieve its organizational objectives, (2) DHS and PLCY have ensured that PLCY's workforce is aligned with PLCY's and DHS's priorities and goals, and (3) PLCY has effectively engaged across the operational components to identify and respond to emerging policy and strategy needs.

To address all three objectives, we analyzed key documents and interviewed officials from PLCY and other DHS offices, including officials responsible for policy, strategy, and plan development and implementation at all eight of DHS's operational components. Specifically, to better understand the roles and responsibilities of PLCY, DHS's eight operational components, and other offices at DHS, we reviewed the NDAA and analyzed documents, such as departmental directives that describe what is required and expected of each office. In addition, we interviewed officials from PLCY to understand its roles and responsibilities, workforce planning practices, and collaboration with DHS operational components.

Furthermore, we interviewed officials from DHS's Office of the Under Secretary for Management to understand the differences between PLCY's roles and responsibilities and those of the Office of the Under Secretary for Management, who oversees all internal management

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<sup>9</sup>GAO, *Combating Terrorism: DHS Should Take Action to Better Ensure Resources Abroad Align with Priorities*, [GAO-13-681](#) (Washington, D.C.; Sept. 25, 2013) and *Critical Infrastructure Protection: Additional Actions by DHS Could Help Identify Opportunities to Harmonize Access Control Efforts*, [GAO-17-182](#) (Washington, D.C.; Feb. 7, 2017).

<sup>10</sup>DHS has fully implemented all three recommendations from [GAO-13-681](#). DHS established: 1) departmentwide priorities for resource use abroad; 2) a routine and institutionalized mechanism to ensure alignment of the department's resource use abroad with departmentwide and governmentwide strategic priorities; and 3) a common reporting framework to allow for the collecting of reliable, comparable departmentwide cost data for resource use abroad. In addition, DHS has implemented the recommendation from [GAO-17-182](#) directed at the Office of Policy to establish goals and objectives to support its broader strategic framework for harmonization of screening and access controls.

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operations and oversight of management functions for components at DHS headquarters. To further understand PLCY's engagement with DHS operational components as well as their perspectives on PLCY's roles and responsibilities, we conducted both unstructured and structured interviews with each of DHS's eight operational components. For the structured interviews, we developed a questionnaire that we tested internally before administering it to DHS officials. At the structured interviews, we asked officials at each operational component the same questions in the same order to ensure we collected information consistently and reliably across the different respondents. We compared our findings to *Standards for Internal Control in the Federal Government*, leading collaboration practices identified in our prior work, and the *DHS Workforce Planning Guide* to determine the extent to which PLCY is able to achieve its goals given its organizational structure, workforce planning, and communication and collaboration with operational components.<sup>11</sup>

We conducted this performance audit from July 2017 to September 2018 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### PLCY Organizational Structure and Vacancies

With the passage of the NDAA in December 2016, PLCY is to be led by an Under Secretary for Strategy, Policy, and Plans, who is appointed by the President with advice and consent of the Senate. The Under Secretary is to report directly to the Secretary of Homeland Security. Prior to the NDAA, the office was headed by an assistant secretary. Since the passage of the act, the undersecretary position has been vacant, and as of June 5, 2018, the President had not nominated an individual to fill the

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<sup>11</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sep. 10, 2014); *Results-Oriented Government: Practices That Can Help Enhance and Sustain Collaboration among Federal Agencies*, [GAO-06-15](#) (Washington, D.C.: Oct. 21, 2005) and *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sep. 27, 2012); and Department of Homeland Security, *DHS Workforce Planning Guide* (Revised July 2015).



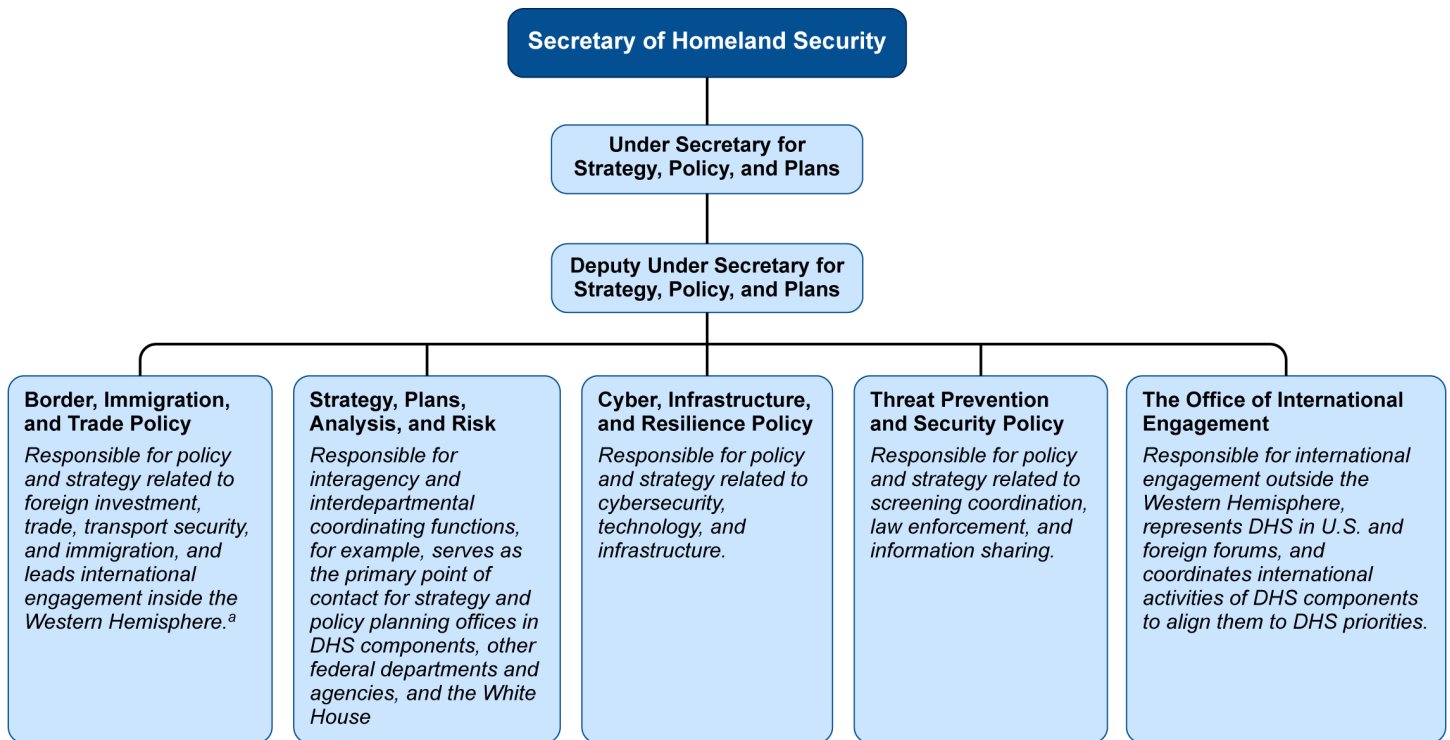
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position. According to PLCY officials, elevating the head of the office to an undersecretary was important because it equalizes PLCY with other DHS management offices and DHS headquarters components. The NDAA further authorizes, but does not require, the Secretary to establish a position of deputy undersecretary within PLCY. If the position is established, the NDAA provides that the Secretary may appoint a career employee to the position (i.e., not a political appointee).<sup>12</sup> In March 2018, the Secretary named a Deputy Under Secretary, who has been performing the duties of the Deputy Under Secretary and the Under Secretary since then. As shown in figure 1, PLCY is divided into five sub-offices, each with a different focus area.

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<sup>12</sup>See 6 U.S.C. § 349(d). Whereas career employees compete under merit selection procedures and their selection is determined on the basis of their relative knowledge, skills, and abilities after fair and open competition that is intended to ensure an equal opportunity for all candidates, political employees are appointed without competition under Presidential, noncareer Senior Executive Service or Schedule C appointments, which do not confer career status.

**Figure 1: Department of Homeland Security’s (DHS) Office of Strategy, Policy, and Plans and Its Sub-offices**



Source: GAO analysis of DHS information. | GAO-18-590

<sup>a</sup>The Office of Immigration Statistics, within Border, Immigration & Trade Policy, is responsible for collecting, disseminating, and ensuring the quality of statistical information and analysis in evaluating the social, economic, environmental, and demographic impact of immigration laws, migration flows, and immigration enforcement.

As of June 5, 2018, the top position in these sub-offices was an assistant secretary and two of the five positions were vacant. As of June 5, 2018, 6 of PLCY’s 12 deputy assistant secretary positions were vacant or filled by acting staff temporarily performing the duties in the absence of permanent staff placement.

## PLCY’s Policy and Strategy Responsibilities, and Strategic Priorities

The NDAA codified many of the functions and responsibilities that PLCY had been carrying out prior to the act’s enactment and, with a few exceptions as discussed later in this report, were largely consistent with the duties the office was already pursuing. According to the act and PLCY officials, one of the office’s fundamental responsibilities is to lead, conduct, and coordinate departmentwide policy development and implementation, and strategic planning. According to PLCY officials, there

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are four categories of policy and strategy efforts that PLCY leads, conducts, or coordinates:

- **Statutory responsibilities:** among others, the Homeland Security Act, as amended by the NDAA, includes such responsibilities as establishing standards of validity and reliability for statistical data collected by the department, conducting or overseeing analysis and reporting of such data, and maintaining all immigration statistical information of U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, and U.S. Citizenship and Immigration Services; the Immigration and Nationality Act includes such responsibilities as providing for a system for collection and dissemination to Congress and the public of information useful in evaluating the social, economic, environmental, and demographic impact of immigration laws, and reporting annually on trends in lawful immigration flows, naturalizations, and enforcement actions,<sup>13</sup>
- **Representing DHS in interagency efforts:** coordinating or representing departmental policy and strategy positions for larger interagency efforts (e.g., interagency policy committees convened by the White House),
- **Secretary's priorities:** leading or coordinating efforts that correspond to the Secretary of Homeland Security's priorities (e.g., certain immigration or law-enforcement related issues), and
- **Self-initiated activities:** opportunities to better harmonize policy and strategy or create additional efficiencies given PLCY's ability to see across the department. For example, PLCY officials said that DHS observed an increase in e-commerce and small businesses shipping items via carriers other than the U.S. Postal Service, thus exploiting a gap in DHS monitoring, which covers the U.S. Postal Service and other traditional shipping entities. PLCY officials noted that DHS's interest in addressing e-commerce issues occurred just before opioids and other controlled substances were being mailed through small businesses and the U.S. Postal Service. As a result, PLCY developed an e-commerce strategy for, among other things, the shipping of illegal items and how to provide information to U.S. Customs and

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<sup>13</sup>See 6 U.S.C. § 349(f)(1)-(2); 8 U.S.C. § 1103(d)-(e). The NDAA amended title VII of the Homeland Security Act by adding, among other provisions, section 709—Office of Strategy, Policy and Plans. See Pub. L. No. 114-328, § 1902(a), 130 Stat. at 2670. Pursuant to the Homeland Security Act, statutory reporting requirements, such as those in the Immigration and Nationality Act that originated with an agency that transferred to DHS, remain in effect. See 6 U.S.C. § 552(d), (f).

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Border Protection before parcels are shipped to the United States from abroad.

In accordance with the NDAA, as PLCY leads, conducts, and coordinates policy and strategy, it is to do so in a manner that promotes and ensures quality, consistency, and integration across DHS and applies risk-based analysis and planning to departmentwide strategic planning efforts. The NDAA further provides that all component heads are to coordinate with PLCY when establishing or modifying policies or strategic planning guidance to ensure consistency with DHS's policy priorities. In addition to the roles PLCY plays that are directly related to leading, conducting, and coordinating policy and strategy, the office is responsible for select operational functions. For example, PLCY is charged with operating the REAL ID and Visa Waiver Programs.<sup>14</sup>

The NDAA also conferred responsibilities to PLCY that had not been responsibilities of the DHS Office of Policy prior to the NDAA's enactment. Among other things, the NDAA charged PLCY with responsibility for establishing standards of reliability and validity for statistical data collected and analyzed by the department, and ensuring the accuracy of metrics and statistical data provided to Congress. In conferring this responsibility, the act also transferred to PLCY the maintenance of all immigration statistical information of the U.S. Customs and Border Protection, U.S. Immigration and Customs Enforcement, and U.S. Citizenship and Immigration Services.

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<sup>14</sup>The REAL ID Act of 2005, enacted in May 2005, addresses the recommendation by the National Commission on Terrorist Attacks upon the United States that the federal government set standards for the issuance of sources of identification, such as driver's licenses. The act establishes minimum security standards for license issuance and production, and prohibits federal agencies from accepting driver's licenses and identification cards for certain purposes from states not meeting the act's minimum standards. DHS presently enforces the REAL ID Act in accordance with a phased enforcement schedule and regulatory timeframes. The Visa Waiver Program, administered by DHS in consultation with the State Department, permits nationals of 38 countries to travel to the United States for business or tourism for stays of up to 90 days without a visa. In return, those 38 countries must permit U.S. citizens and nationals to travel to their countries for a similar length of time without first obtaining a visa for business or tourism purposes.

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PLCY has established five performance goals:

- build departmental policy-making capacity, coordination, and foster the Unity of Effort,<sup>15</sup>
- mature the office as a mission-oriented, component-focused organization that is responsive to DHS leadership,
- effectively engage and leverage stakeholders,
- enhance productivity and effectiveness of policy personnel through appropriate alignment of knowledge, skills, and abilities, and
- accountability, transparency, and leadership.

PLCY officials stated that the office established the performance goals in fiscal year 2015 and they were still in effect as of fiscal year 2018.

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## Homeland Security Crosscutting Missions and Functions

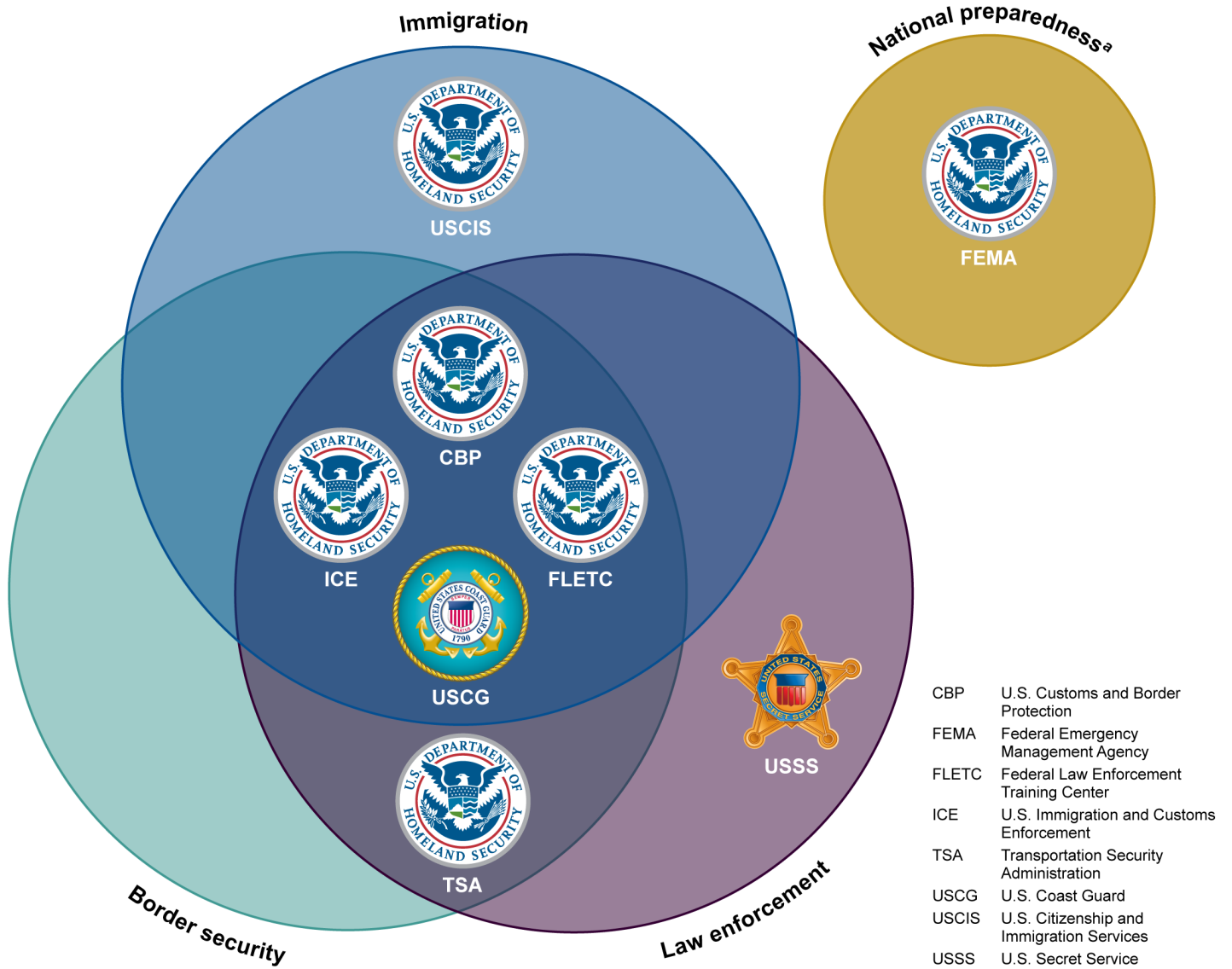
As previously discussed, DHS has eight operational components. DHS also has six support components.<sup>16</sup> Although each one has a distinct role to play in helping to secure the homeland, there are operational and support functions that cut across mission areas. For example, nearly every operational component has, as part of its security operations, a need for screening, vetting, and credentialing procedures and risk-targeting mechanisms. Likewise, nearly all operational components have some form of international engagement, deploying staff abroad to help secure the homeland before threats reach U.S. borders. Finally, as shown in figure 2, different aspects of broad mission areas fall under the purview of more than one DHS operational component.

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<sup>15</sup>The Unity of Effort is a DHS initiative to synchronize major departmental planning, programming, budgeting, and joint operations decision processes—including strategy development, joint requirements generation, resource allocation, acquisition management, and operational planning—to improve departmental cohesiveness and operational effectiveness.

<sup>16</sup>The DHS support components are the Countering Weapons of Mass Destruction Office, Directorate for Management, National Protection and Programs Directorate, Office of Intelligence and Analysis, Office of Operations Coordination, and Science and Technology Directorate.

**Figure 2: Examples of Overlapping Mission Areas across Multiple Department of Homeland Security (DHS) Operational Components**



Source: GAO analysis of DHS information. | GAO-18-590

<sup>3</sup>Although national preparedness is not depicted as an overlapping issue area in this figure, national preparedness involves multiple parts of the department. Multiple DHS components and offices have defined roles in the National Response Framework, which describes how the nation is to respond to emergencies. For example, the part of the National Response Framework that assigns roles for transportation support specifically names the Federal Emergency Management Agency, U.S. Customs and Border Protection, U.S. Coast Guard, Transportation Security Administration, and DHS's Office of Infrastructure Protection. The latter is in DHS's National Protection and Programs Directorate, which is responsible for leading federal efforts to protect and enhance the resilience of the nation's

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physical and cyber infrastructure and has a number of important national preparedness responsibilities.

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## Key Departmentwide and Crosscutting Strategic Efforts

### DHS Leadership Entities PLCY Manages

- **Senior Leaders Council** is chaired by the Secretary and includes the Deputy Secretary, undersecretaries, and heads of operational and support components. It meets regularly and helps to facilitate the Unity of Effort; support operational components; develop, coordinate, and implement DHS policies and programs; and share information.
- **Deputies Management Action Group** is chaired by the Deputy Secretary and includes undersecretaries and heads of operational and support components. It helps to facilitate the Unity of Effort; support operational components; develop, coordinate, and implement DHS policies and programs; and share information. The group meets regularly to discuss and provide recommendations on specific initiatives for emerging issues.
- **Executive Steering Committees** are departmental governance bodies. PLCY chairs two executive steering committees: the Strategy and Policy Executive Steering Committee (S&P ESC) and the Operational Planning ESC. The S&P ESC coordinates all department-level strategies, policies, and corresponding implementation plans. The Operational Planning ESC provides senior executive oversight for DHS operational level planning products and activities. Both ESCs include senior executive leadership from each DHS operational component and several DHS headquarters offices.
- **Winter Studies** are in-depth analytic efforts designed to provide departmental leadership with data and analysis to inform DHS's most complex decisions and identify specific topics of leadership interest requiring additional study.

Source: GAO analysis of DHS strategic documents. | GAO-18-590

PLCY is responsible for coordinating three key DHS strategic efforts: the QHSR, the DHS Strategic Plan, and the Resource Planning Guidance.

- The QHSR is a comprehensive examination of the homeland security strategy of the nation that is to occur every 4 years and include recommendations regarding the long-term strategy and priorities for homeland security of the nation and guidance on the programs, assets, capabilities, budget, policies, and authorities of DHS.<sup>17</sup> The QHSR is to be conducted in consultation with the heads of other federal agencies, key DHS officials (including the Under Secretary, PLCY), and key officials from other relevant governmental and nongovernmental entities.<sup>18</sup>
- The DHS Strategic Plan describes how DHS can accomplish the missions it identifies in the QHSR report, identifies high-priority mission areas within DHS, and lays the foundation for DHS to accomplish its Unity of Effort Initiative as well as various cross-agency priority goals in the strategic plan, such as cybersecurity.<sup>19</sup>
- The Resource Planning Guidance describes DHS's annual resource allocation process in order to execute the missions and goals of the QHSR and DHS Strategic Plan. The Resource Planning Guidance contains guidance over a 5-year period and informs several forward-looking reports to Congress, including the annual fiscal year Congressional Budget Justification as well as the Future Years Homeland Security Program Report.

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<sup>17</sup>6 U.S.C. § 347(a)(1)-(2).

<sup>18</sup>DHS is also to submit a report to Congress that includes, among other things, the results of the QHSR. See 6 U.S.C. § 347(c).

<sup>19</sup>DHS develops its strategic plan in accordance with the GPRA Modernization Act of 2010 (5 U.S.C. § 306), and OMB Circular A-11, Part 6 (2013).

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**PLCY Has Effectively Coordinated Intradepartmental Strategy Efforts, but Ambiguous Roles and Responsibilities Have Limited PLCY's Effectiveness in Coordinating Policy**

Although PLCY has effectively carried out key coordination functions at the senior level related to strategy, PLCY's ability to lead and coordinate policy have been limited due to ambiguous roles and responsibilities and a lack of predictable, accountable, and repeatable procedures.

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**PLCY Has Effectively Conducted Key Coordination Functions at the Senior Level**

According to our analysis and interviews with operational components, PLCY's efforts to lead and coordinate departmentwide and crosscutting strategies—a key organizational objective—have been effective in providing opportunities for all relevant stakeholders to learn about and contribute to departmentwide or crosscutting strategy development. In this role, PLCY routinely serves as the executive agent for the Deputies Management Action Group and the Senior Leaders Council, which involve analytical and coordination support. PLCY also provides support for deputy- and principal-level decision making. For example, the Strategy and Policy Executive Steering Committee (S&P ESC) meetings have been used to discuss components' implementation plans for crosscutting strategies, PLCY's requests for information from components for an upcoming strategy, and updates on departmentwide strategic planning initiatives. According to PLCY and operational component officials, PLCY also provides leadership for the Resource Planning Guidance and Winter Studies, both of which help inform departmentwide resource decision-making. For example, officials from one operational component stated that PLCY's leadership of the Resource Planning Guidance is a helpful practice for coordination and collaboration on departmentwide or crosscutting strategies. The officials stated that PLCY reaches out to ensure that the component is covering the Secretary's priorities and this helps the component to ensure that its budget includes them. Furthermore, PLCY develops and coordinates policy options and opinions for the Secretary to present at the National Security Council and other White House-level meetings. For example, PLCY officials told us that, in light of allegations of Russian involvement in using poisonous nerve



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agents on two civilians in Great Britain, PLCY coordinated the collection of information to develop a policy recommendation for the Secretary to present at a National Security Council meeting.

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**Ambiguity in Roles and Responsibilities and a Lack of Predictable, Repeatable, and Accountable Procedures Have Limited PLCY's Ability to Lead and Coordinate Policy**

PLCY has encountered challenges leading and coordinating efforts to develop, update, or harmonize policy—also a key organizational objective—because it does not have clearly-defined roles, responsibilities, and mechanisms to implement these responsibilities in a predictable, repeatable, and accountable way. *Standards for Internal Control in the Federal Government* states that management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives. As such, an organization's management should develop an organizational structure with an understanding of the overall responsibilities and assign these responsibilities to discrete units to enable the organization to operate in an efficient and effective manner.<sup>20</sup> An organization's management should also implement control activities through policies. It is important that an organization's management document and define policies and communicate those policies and procedures to personnel, so they can implement control activities for their assigned responsibilities. In addition, leading collaboration practices we have identified in our prior work include defining and articulating a common outcome, clarifying roles and responsibilities, and establishing mutually-reinforcing or joint strategies to enhance and sustain collaboration, such as the work that PLCY and the components need to do together to ensure that departmentwide and crosscutting policy is effective for all relevant parties.<sup>21</sup>

According to PLCY officials, in general, PLCY is responsible for leading the development of a policy when it crosses multiple components or if there is a national implication, including White House interest in the policy. However, PLCY officials acknowledged that this practice does not always make them the lead and there are no established criteria that define the circumstances under which PLCY (or another organizational unit) should lead development of policies that cut across organizational boundaries. PLCY officials said the lead entity for a policy is often announced in an email from the Secretary's office, on a case-by-case basis. According to PLCY officials, once components have been assigned

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<sup>20</sup> [GAO-14-704G](#).

<sup>21</sup> [GAO-06-15](#) and [GAO-12-1022](#).

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responsibility for a policy, they have generally tended to retain it, and PLCY may not have oversight for crosscutting policies that are maintained by operational components. Therefore, there is no established, coordinated system of oversight to periodically monitor the need for policy harmonization, revision, or rescission.

In the absence of clear roles and responsibilities, and processes and procedures to support them, PLCY and officials in 5 of the 8 components have encountered challenges in coordinating with each other. Although PLCY and most component officials we interviewed described overall positive experiences in coordinating with each other, we identified multiple instances of (1) confusion about which parties should lead and engage in policy efforts, (2) not engaging components at the right times, (3) incompatible expectations around timelines, and (4) uncertainty about PLCY's role and the extent to which it can and should identify and drive policy in support of a more cohesive DHS.

**Confusion about who should lead and engage.** Officials from one operational component told us that they were tasked with leading a departmentwide policy development effort they believed was outside their area of responsibility and expertise. Officials in another operational component stated that components sometimes end up coordinating among themselves, but that policy development could be more effective and efficient if PLCY took the role of convener and facilitator to ensure the departmentwide perspective is present and all relevant stakeholders participate. Officials from a third component stated that they spent significant time and resources to develop a policy directly related to their component's mission. As the component got ready to implement the policy, PLCY became aware of it and asked the component to stop working on the policy, so PLCY could develop a departmentwide policy. According to component officials, while they were supportive of a departmentwide policy, PLCY's timing delayed implementation of the policy the component had developed and wasted the resources it had invested. Moreover, officials from four operational components told us that sometimes counselors from outside PLCY, such as the Secretary's office, have led policy efforts that seem like they should be PLCY's responsibility, which created more confusion about what PLCY's ongoing role should be.<sup>22</sup> PLCY officials agreed that, at times, it has been

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<sup>22</sup>A PLCY official stated that counselors are in the Secretary's office and, among other responsibilities, are the principal advisors to the Secretary on policy issues. The official said that counselors are PLCY's first point of entry into the Secretary's office on any given topic and PLCY coordinates closely with them on a weekly basis.

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challenging to define PLCY's role relative to counselors for the Secretary, and acknowledged that clear guidance to define who is leading which types of policy development and coordination would be helpful.

**Not engaging components at the right times.** Officials from 5 of 8 operational components told us that they had not always been engaged at the right times by PLCY in departmentwide or crosscutting policies that affected their missions. For example, officials from an operational component described a crosscutting policy that had significant implications for some of its key operational resources, but the component was not made aware of the policy until it was about to be presented at the White House. Officials from another component stated that they learned of a new policy after it was in place and had to find significant training and software resources to implement it even though they viewed the policy as unnecessary for their mission. PLCY officials stated that, while they intend to identify all components that should be involved in a policy, there are times when PLCY is unaware a component is developing a policy that affects other components. PLCY officials said they will involve other components when PLCY becomes aware that a component is developing such a policy. PLCY officials stated that it would be helpful to have a process and procedures for cross-component coordination on policies to help guide engagement regardless of who is developing the policy.

**Incompatible expectations around timelines.** Officials at 4 of 8 operational components stated that short timelines from PLCY to provide input and feedback can prevent PLCY from obtaining thoughtful and complete information from components. For example, officials from one component stated that PLCY asked them to perform an analysis that would inform major, departmental decision-making and quickly provide the analysis. Component officials told us that they did not understand why PLCY needed the analysis on such an accelerated timeline, which seemed inappropriate given the level of importance and purpose of the analysis. Officials from another component told us that PLCY had not always provided enough time to provide thoughtful feedback; therefore, component officials were not sure if PLCY really wanted their feedback. Officials from a third component stated that sometimes PLCY did not provide sufficient time for thoughtful input or feedback that had cleared the component's legal review, so component officials elected to miss PLCY's deadline and provide late feedback. PLCY officials told us that, frequently, timelines are not within their control, a situation that some component officials also noted during our interviews with them. However, PLCY officials agreed that a documented, predictable, and repeatable process and procedures for policies may help ensure PLCY provides

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sufficient comment time when in its control and may provide a basis to help negotiate timelines with DHS leadership in other situations. PLCY officials stated that, even with a documented process and procedures, there would still be circumstances when short timelines are unavoidable.

**Uncertainty about PLCY's role in driving policy harmonization.** Policy officials at 6 of 8 operational components told us that they were unsure or not aware of PLCY's role in harmonizing policy across the department, and stated a desire for PLCY to be more involved in harmonizing or enhancing departmentwide and crosscutting policy or for greater clarity about PLCY's responsibility to play this role. As previously discussed, PLCY's policy and strategy efforts fall into four categories—statutory responsibilities, interagency efforts, Secretary's priorities, and self-initiated activities; these activities include efforts to better harmonize policies and strategies. According to PLCY officials, the category with the lowest priority is self-initiated activities. PLCY officials stated that PLCY makes tradeoffs and rarely chooses to work on self-initiated projects over its other three categories of effort. According to the officials, PLCY's work on the other three higher-priority categories is sufficient to ensure that the office is effectively leading, conducting, and coordinating strategy and policy across the department. Given its organizational position and strategic priorities, PLCY is uniquely situated to identify opportunities to better harmonize or enhance departmentwide and crosscutting policy, a role that is in line with its strategic priority to build departmental policymaking capacity and foster Unity of Effort. In the absence of clear articulation of the department's expectations for PLCY in this role, it is difficult for PLCY and DHS leadership to make completely informed and deliberate decisions about the tradeoffs they make across any available resources.

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### Past Efforts to Define and Codify PLCY's Roles and Responsibilities in a Delegation of Authority Remain Incomplete

In addition to statutory authority that PLCY received in the NDAA, PLCY officials stated that a separate, clear delegation of authority—a mechanism by which the Secretary delegates responsibilities to other organizational units within DHS—is needed to help confront the ambiguous roles it has experienced in the past. PLCY officials stated that past efforts to finalize a delegation of authority have stalled during leadership changes and that the initiative has been a lower priority, in part, due to where PLCY is in its maturation process and DHS is in its evolution into a more cohesive department under the Unity of Effort. As of May 2018, the effort had been revived, but it is not clear whether and when DHS will finalize it.

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According to a senior official in the Office of the Under Secretary for Management, a delegation of authority is important for PLCY. He described the creation of a delegation of authority as a process that does more than simply delegate the Secretary's authority. He noted that defining PLCY's roles and responsibilities in relation to other organizational units presents an opportunity to engage all relevant components and agree on appropriate roles. He said that, earlier in the organizational life of the Office of the Under Secretary for Management, it went through a process like this, which has been vital in it being able to carry out its mission. He said now that PLCY has a deputy undersecretary in place, this is a good time to restart the process to develop the delegation of authority. Until the delegation or a similar process clearly and fully articulates PLCY's roles and responsibilities, PLCY and the operational components are likely to continue to experience limitations in collaboration on crosscutting and departmentwide policy.

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## PLCY Identifies Workforce Needs during the Annual Budget Cycle, but Could Apply DHS Workforce Planning Guidance to Better Identify and Communicate Resource Needs

PLCY determines its workforce needs through the annual budget process, but systematic identification of workforce demand, capacity gaps, and strategies to address them could help ensure that PLCY's workforce aligns with its and DHS's priorities and goals.

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## PLCY Uses the Annual Budget Cycle to Determine Workforce Needs and Requires Flexibility in Staffing

To determine its workforce needs each year, PLCY officials told us that, as part of the annual budget cycle, they work with PLCY staff and operational components to determine the scope of activities required for each PLCY area of responsibility and the associated staffing needs. PLCY officials said there are three skill sets needed to carry out the office's responsibilities: policy analysis, social science analysis, and regional affairs analysis. PLCY officials explained that the office's priorities can change rapidly as events occur and the Secretary's and

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administration's priorities shift. Therefore, according to PLCY officials, their staffing model must be flexible. They said that, rather than a defined system of full-time equivalents with set position types and levels, PLCY officials start with their budget allotment and consider current and potential emerging needs to set position types and levels, which may fluctuate significantly from year to year. In addition, PLCY officials stated that PLCY staff are primarily generalists and, given the versatility in skill sets of their workforce, PLCY has a lot of flexibility to move staff around if there is an emerging need. For example, if there is an emerging law enforcement issue that affects all law enforcement agencies, PLCY may be tasked with developing a policy to ensure the issue is addressed quickly and that the resulting policy is harmonized across the department and with other law enforcement agencies, such as the Department of Justice.

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**PLCY Has Not Used DHS's Workforce Planning Guide to Analyze Workforce Gaps or Communicate Tradeoffs to DHS Management to Ensure Alignment with DHS Priorities**

While PLCY completes some workforce planning activities as part of its annual budgeting process, PLCY does not systematically address several aspects of the *DHS Workforce Planning Guide* that may create more efficient operations and greater alignment with DHS priorities.<sup>23</sup> According to the *DHS Workforce Planning Guide*, workforce planning is a process that ensures the right number of people with the right skills are in the right jobs at the right time for DHS to achieve the mission. This process provides a framework to:

- align workforce planning to the department's mission and goals,
- predict, then assess how evolving missions, new processes, or environmental conditions may impact the way that work will be performed at DHS in the future,
- identify gaps in capacity,
- develop and implement strategies and action plans to address capacity and capability gaps, and
- continuously monitor the effectiveness of action plans and modify, as necessary.

The *DHS Workforce Planning Guide* stipulates that an organization's management should not only lead and show support during the workforce

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<sup>23</sup>Department of Homeland Security, *DHS Workforce Planning Guide*, July 2015. According to DHS officials, the guide applies to any workforce in DHS or operational components.

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planning process, but ensure alignment with the strategic direction of the agency. Moreover, *Standards for Internal Control in the Federal Government* states that management should use quality information to achieve the entity's objectives. For example, management uses an entity's operational processes to make informed decisions and evaluate the entity's performance in achieving key agency objectives.<sup>24</sup>

According to PLCY officials, the current staffing paradigm involves shifting the office's staff when new and urgent issues arise from the Secretary or White House, and adding these unexpected tasks to staff's existing responsibilities. However, this means that tradeoffs are made, resulting in some priority items taking longer to address or not getting attention at all. PLCY officials stated that they have been caught off-guard at times by changes in demands placed on PLCY and had to scramble to address the new needs.

Additionally, PLCY officials said they have a number of vacancies, which hamper the office's ability to meet certain aspects of its mission. For example, PLCY's Office of Cyber, Infrastructure, and Resilience was created in 2015. According to PLCY officials, PLCY has had some resources to address cyber issues, however, there has not been funding to staff this office and an assistant secretary has not been appointed to lead it. Therefore, PLCY officials stated that PLCY has not been able to address its responsibilities for infrastructure resilience.

Similarly, PLCY has limited capacity for risk analysis. A provision of the NDAA provides that PLCY is to:

*develop and coordinate strategic plans and long-term goals of the department with risk-based analysis and planning to improve operational mission effectiveness, including consultation with the Secretary regarding the quadrennial homeland security review under section 707 [6 U.S.C. § 347].<sup>25</sup>*

However, PLCY officials acknowledged that their focus on identifying needs for risk analyses and conducting them has been limited, in part, because DHS disbanded the risk management office.

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<sup>24</sup>GAO-14-704G.

<sup>25</sup>See 6 U.S.C. § 349(c)(3).

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Officials from one component told us that they contribute to a report that PLCY coordinates, called Homeland Security National Risk Characteristics, which is prepared as a precursor to the DHS Strategic Plan. PLCY officials stated that, outside of these foundational documents and some risk-based analyses completed as part of specific policy development efforts, PLCY does not have the capacity to complete any additional risk analysis activities.

Although PLCY officials said they conduct some analysis of potential demands as a starting point for how to allocate PLCY's annual staffing budget, these efforts are largely informal and internal and have not resulted in a systematic analysis that provides PLCY and DHS management with the information they need to understand the effects of resource tradeoffs. Also, PLCY officials said they track accomplishments toward PLCY's strategic priorities as part of a weekly meeting and report, however, officials acknowledged they do not analyze what role workforce decisions have played in achieving or not achieving strategic priorities. Moreover, although PLCY officials stated that they have intermittent, in-person, informal communication about resource use, they have not used the principles outlined in the *DHS Workforce Planning Guide* to systematically identify and communicate workforce demands, capacity gaps, and strategies to address workforce issues. According to PLCY officials, they have not conducted such analysis, in part, because the Secretary's office has not requested it of them or the other DHS offices that are funded in the same part of the DHS budget. Regardless of whether the Secretary expects workforce analysis as part of the budgeting process, the *DHS Workforce Planning Guide* could be used within and outside of the budgeting process to help inform resource decision making throughout the year.

PLCY officials stated that at the PLCY Deputy Under Secretary's initiative, they recently began a review of all relevant statutory authorities, which they will map against the current organizational structure and day-to-day operations. The Deputy Under Secretary plans to use the results of the review to enhance PLCY's efficiency and effectiveness, and the results could serve as a foundation for a more holistic and systematic analysis of workforce demand, any capacity gaps, and strategies to address them. Employing workforce planning principles—in particular, systematic identification of workforce demand, capacity gaps, and strategies to address them—consistent with the *DHS Workforce Planning Guide* could better position PLCY to use its workforce as effectively as possible under uncertain conditions. Moreover, using the DHS guide would help PLCY to systematically communicate information about any



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workforce gaps to DHS leadership, so there is transparency about how workforce tradeoffs affect PLCY's ability to support DHS goals.

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## Additional External Communication Practices Could Enhance PLCY's Collaboration with DHS Stakeholders

As discussed earlier, officials from PLCY and DHS operational components praised existing mechanisms to coordinate and communicate at the senior level, especially about strategy. However, component officials identified opportunities for PLCY to better connect at the staff level to identify and respond to emerging policy and strategy needs. Leading practices for collaboration that we have identified in our prior work state that it is important to ensure that all relevant participants have been included in a collaborative effort, and positive working relationships among participants from different agencies or offices can bridge organizational cultures. These relationships build trust and foster communication, which facilitate collaboration.<sup>26</sup>

Also, as previously stated, PLCY has mechanisms like the S&P ESC to communicate and coordinate with operational components and other DHS stakeholders at the senior level (e.g., Senior Executive Service officials). However, PLCY does not have a mechanism to effectively engage in routine communication and collaboration at the staff level (e.g., program and policy specialists working at operational components to oversee or implement policy and strategy functions). Specifically, officials with responsibility for policy and strategy at 6 of 8 operational components told us that they did not have regular contact with or know who to contact at PLCY for questions about policies or strategies, or that the reason they knew who to contact was because of existing working relationships, not because of efforts PLCY had undertaken to facilitate such contacts. In addition, some component officials noted that, when they tried to use the PLCY website to coordinate, they found it to be out of date and lacking sufficient information. PLCY officials acknowledged that the website needs improvement. They stated that the office has developed improved content for the website, but does not have the necessary staff to update the website. According to the officials, the needed staff should be hired soon and improved content should be on the website by the end of summer 2018.

Although officials at 5 of the 8 operational components we interviewed stated that the quality of PLCY's coordination and collaboration has

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<sup>26</sup>[GAO-12-1022](#).

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improved in the past 2 years or so, component officials offered several suggestions to enhance PLCY's coordination and collaboration, especially at the staff level.<sup>27</sup> Among these were:

- conduct routine information sharing meetings with staff-level officials who have policy and strategy responsibilities at each operational component,
- clearly articulate points of contact, their contact information, and their portfolios at PLCY as well as at other policy and strategy stakeholders,
- ensure the PLCY website is up-to-date with contact information for PLCY and components that work in strategy and policy areas, and with relevant information about crosscutting strategy and policy initiatives underway,
- host a forum—such as an annual conference—to bring together policy and strategy officials from PLCY and DHS components to share ideas and make contacts, and
- prepare a standard briefing for component officials with strategy and policy responsibilities to help ensure that staff at all levels understand what PLCY does, how it works, and opportunities for engagement on emerging policy and strategy needs or identified harmonization opportunities.

For example, officials from one component told us that they would like PLCY officials to have in-person meetings with component staff to discuss what PLCY does, who to contact in PLCY, where to find information about policies and strategies, and other relevant information to ensure a smooth working relationship between the component and PLCY.

According to PLCY officials, the office recognizes the value of creating mechanisms to connect staff, who work on policy and strategy at all levels in DHS. PLCY officials said they have historically done a better job in coordinating at the senior level, but are interested in expanding opportunities to connect other staff with policy and strategy

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<sup>27</sup>Officials from 2 of the 8 components stated that the quality of PLCY's communication and collaboration stayed about the same over the past 2 years or so, while officials from 1 of the 8 components stated that the quality of PLCY's communication and collaboration declined because of issues with harmonizing departmental positions on key current policy issues.

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responsibilities. PLCY officials stated that they are considering creating a working group structure that mirrors existing organizational mechanisms to coordinate at the senior level, but have not taken steps to do so.

Routine collaboration among PLCY, operational components, and other DHS offices at the staff level is important to ensure that PLCY is able to carry out its functions under the NDAA, including the effective coordination of policies and strategies. A positive working relationship among these stakeholders can build trust, foster communication, and facilitate collaboration. Such enhanced communication and collaboration across PLCY and among component officials with policy and strategy responsibility could help the department more quickly and completely identify emerging, crosscutting strategy and policy needs and opportunities to enhance policy harmonization.

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## Conclusions

PLCY's efforts to lead, conduct, and coordinate departmentwide and crosscutting policies have sometimes been hampered by the lack of clearly-defined roles and responsibilities. In addition, PLCY does not have a consistent process and procedures for its strategy development and policymaking efforts. Without a delegation of authority or similar documentation from DHS leadership clearly articulating PLCY's missions, roles, and responsibilities—along with defined processes and procedures to carry them out in a predictable and repeatable manner—there is continuing risk that confusion and uncertainty about PLCY's authority, missions, roles, and responsibilities will limit its effectiveness.

PLCY employs some workforce planning, but does not systematically apply key principles of the *DHS Workforce Planning Guide* to help predict workforce demand, and identify any workforce gaps and design strategies to address them. Without this analysis, PLCY faces limitations in ensuring that its workforce is aligned with its and DHS's priorities and goals. Moreover, the results of this analysis would better position PLCY to communicate to DHS leadership any potential tradeoffs in workforce allocation that would affect PLCY's ability to meet priorities and goals.

PLCY could enhance its use of mechanisms for collaboration and communication with DHS stakeholders at the staff level. Implementation of additional mechanisms at the staff level for regular communication and coordination, including providing up-to-date information to stakeholders about the office, could help PLCY and operational components to better connect in order to identify and address emerging policy and strategy needs.

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## Recommendations for Executive Action

We are making the following four recommendations to DHS:

The Secretary of Homeland Security should finalize a delegation of authority or similar document that clearly defines PLCY's mission, roles, and responsibilities relative to DHS's operational and support components. (Recommendation 1)

The Secretary of Homeland Security should create corresponding processes and procedures to help implement the mission, roles, and responsibilities defined in the delegation of authority or similar document to help ensure predictability, repeatability, and accountability in departmentwide and crosscutting strategy and policy efforts. (Recommendation 2)

The Under Secretary for Strategy, Policy, and Plans should use the *DHS Workforce Planning Guide* to help identify and analyze any gaps in PLCY's workforce, design strategies to address any gaps, and communicate this information to DHS leadership. (Recommendation 3)

The Under Secretary for Strategy, Policy, and Plans should enhance the use of collaboration and communication mechanisms to connect with staff in the components with responsibilities for policy and strategy to better identify and address emerging needs. (Recommendation 4)

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## Agency Comments and Our Evaluation

We provided a draft of this report for review and comment to DHS. DHS provided written comments, which are reproduced in appendix I. DHS also provided technical comments, which we incorporated, as appropriate. DHS concurred with three of our recommendations and described actions planned to address them. DHS did not concur with one recommendation.

Specifically, DHS did not concur with our recommendation that PLCY should use the *DHS Workforce Planning Guide* to help identify and analyze any gaps in PLCY's workforce, design strategies to address any gaps, and communicate this information to DHS leadership. The letter described a number of actions, including actions that are also described in the report, which PLCY takes to help ensure alignment of its staff with organizational needs. In the letter, PLCY officials pointed to the workforce activities PLCY undertakes as part of the annual budgeting cycle. We acknowledge that the actions described to predict upcoming priorities and resource needs as part of the annual budgeting cycle are in line with the

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DHS workforce planning principles. However, as we noted, there are opportunities to apply the workforce planning principles outside the annual budgeting cycle to provide greater visibility and awareness of resource tradeoffs to management inside PLCY and in the Secretary's office.

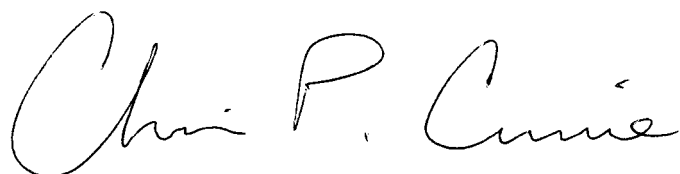
In the letter, PLCY officials made note of the dynamic and changing nature of its operational environment, stating that it often required them to shift resources and priorities on a more frequent or ad hoc basis than many organizations. We acknowledged in the report that PLCY's operating environment requires it to maintain flexibility in its staffing approach. However, PLCY has a number of important duties, including helping foster Unity of Effort throughout the department and helping to ensure the availability of risk information for departmental decision making, that require longer-term, sustained attention and strategic management. During interviews, PLCY officials acknowledged that striking a balance between these needs has been difficult and at times they have faced significant struggles. The report describes some areas where, during the time we were conducting our work, it was clear that some tasks and functions, such as risk analyses, lacked the resources or focus necessary to ensure they received sustained institutional attention. It is because of PLCY's dynamic operating environment, coupled with the need for sustained institutional attention to other key responsibilities, that we recommended PLCY undertake workforce planning activities that would help generate better information for PLCY and DHS management to have full visibility and awareness of gaps and resource tradeoffs.

Finally, the letter stated that because PLCY is a very small and flat organization, it is able to identify capacity gaps and develop action plans without obtaining all of the data collected through each recommended element, worksheet, form, and template of the model proposed in the *DHS Workforce Planning Guide*. We acknowledge that it would be counterproductive for PLCY to engage in data collection and analysis that are significantly more elaborate than its planning needs. Nevertheless, we continue to believe that PLCY could use the principles more robustly, outside the annual budgeting process, to help ensure that it identifies and communicates the effect that resource tradeoffs have on its ability to accomplish its multifaceted mission.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>. If you or your staff have any questions concerning this report, please contact me at (404) 679-1875 or [CurrieC@gao.gov](mailto:CurrieC@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made significant contributions to this report are listed in Appendix II.

A handwritten signature in black ink that reads "Chris P. Currie". The signature is written in a cursive style with a large initial "C" and a distinct "P" and "C".

Chris P. Currie  
Director, Homeland Security and Justice

# Appendix I: Comments from the Department of Homeland Security

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



**Homeland  
Security**

September 5, 2018

Chris P. Currie  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-18-590, "HOMELAND SECURITY: Clearer Roles and Responsibilities for the Office of Strategy, Policy, and Plans and Workforce Planning Would Enhance Its Effectiveness"

Dear Mr. Currie:

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

The Department is pleased to note GAO's positive recognition that the DHS Office of Strategy, Policy, and Plans' (PLCY) "organizational structure and efforts to lead and coordinate departmentwide and crosscutting strategies—a key organizational objective—have been effective." For example, the draft report cited PLCY's coordination efforts for a strategy and policy executive steering committee having been successful, particularly for strategies.

Prior to passage of the Fiscal Year 2017 National Defense Authorization Act, which codified PLCY's role and required that the office be led by a Presidentially-nominated and Senate confirmed Under Secretary, PLCY never had a Senate-confirmed Under Secretary. In addition, on March 4, 2018 the first career Deputy Under Secretary was named to PLCY.

It is also important to note that PLCY is currently conducting a Strategic Review to baseline current practices and identify processes and procedures necessary to fulfill its statutory responsibilities. When complete, the review will serve as the basis for developing functional roles and responsibilities to create routine and uniform processes for the development and coordination of strategies and policies across the homeland

security enterprise. As such, once its senior leadership positions are filled and an Under Secretary is confirmed, PLCY is on track to fundamentally address, within the next year, the issues GAO has identified in this report.

The draft report contained four recommendations, three with which the Department concurs and one with which it non-concurs. Attached find our detailed response to each recommendation. Technical comments were previously provided under separate cover.

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

Sincerely,



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

Attachment



**Attachment: Management Response to Recommendations  
Contained in GAO-18-590**

GAO recommended that:

**Recommendation 1:** The Secretary of Homeland Security should finalize a delegation of authority or similar document that clearly defines PLCY's mission, roles, and responsibilities relative to DHS's operational and support components.

**Response:** Concur. Although PLCY already has a delegation of authority for many specific matters, DHS leadership agrees that a more comprehensive delegation is needed to help ensure that all of PLCY's statutory and delegated authorities are fulfilled, as appropriate. The Senior Official Performing the Duties of the Under Secretary for PLCY will work with the DHS Deputy Under Secretary for Management, who oversees the DHS directives and delegations development process, to publish a comprehensive delegation for PLCY authorities. Estimated Completion Date (ECD): December 31, 2018

**Recommendation 2:** The Secretary of Homeland Security should create corresponding processes and procedures to help implement the mission, roles, and responsibilities defined in the delegation of authority or similar document to help ensure predictability, repeatability, and accountability in department-wide and crosscutting strategy and policy efforts.

**Response:** Concur. Once a comprehensive delegation of authority for PLCY authorities has been published, the Under Secretary for PLCY will work with the DHS Under Secretary for Management, Component and Headquarters offices across the Department, and other stakeholders to develop and publish the directives, instructions, and other guidance needed to implement the PLCY delegation of authority. This will include not only defining PLCY's responsibilities but also documenting Component, other Headquarters office responsibilities, processes, and procedures, as well as those of the Secretary and Deputy Secretary's staff, as appropriate. ECD: September 30, 2019

**Recommendation 3:** The Under Secretary for Strategy, Policy, and Plans should use the *DHS Workforce Planning Guide* to help identify and analyze any gaps in PLCY's workforce, design strategies to address any gaps, and communicate this information to DHS leadership.

**Response:** Non-concur. As discussed with GAO during the audit, PLCY does employ the *DHS Workforce Planning Guide* to the extent possible in its operating environment. Instead, PLCY aligns its workforce planning with the Department's mission and goals, attempts to predict evolving conditions, identifies gaps and implements action plans to

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hire into capability gaps, and continuously monitors its effectiveness. Each budget year, PLCY produces an assessment of the right number of staff to achieve priorities within the budget baseline, justifies, and requests additional resources for targeted priorities to DHS leadership, as necessary. While PLCY does this type of workforce planning, it is important to note that the type of work PLCY undertakes is dynamic and often can change based on operational necessity, Congressional, or Administration direction. This requires the ability to be nimble and shift resources and priorities on a more frequent or ad hoc basis than many organizations. Because PLCY is a very small and flat organization, it is able to identify capacity gaps and develop action plans without obtaining all of the data collected through each recommended element, worksheet, form, and template of the model proposed in the *DHS Workforce Planning Guide*. We request that GAO consider this recommendation resolved and closed as implemented.

**Recommendation 4:** The Under Secretary for Strategy, Policy, and Plans should enhance the use of collaboration and communication mechanisms to connect with staff in the components with responsibilities for policy and strategy to better identify and address emerging needs.

**Response:** Concur. PLCY believes active collaboration and communication with DHS Components, Headquarters offices, and other stakeholders is a cornerstone of its responsibilities. While PLCY staff coordinates daily with counterparts, it is essential to also have more formal, routine, codified mechanisms for collaboration and coordination. PLCY has existing executive level bodies, such as the Strategy and Policy Executive Steering Committee, which GAO noted provide effective communication and coordination at a senior level.

The Deputy Under Secretary for Strategy, Policy, and Plans will utilize existing structures to create and codify additional staff-level subgroups/working groups/communities of practice with roles and responsibilities to ensure collaboration and coordination is also occurring at the subject matter expert (SME) level. The recently established DHS Immigration Policy Council will serve as the pilot for this. The Immigration Policy Council is an executive level body recently created to coordinate and communication across the Department on policy development and implementation for all immigration issues. PLCY plans to create SME-level working groups under the oversight of the Council that will meet routinely on specific issues or topics beginning in the first quarter of Fiscal Year 2019. The results of these meeting will then be staffed up through the Council, Deputy Secretary, and Secretary, as appropriate. ECD:  
December 31, 2018

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# Appendix II: GAO Contact and Staff Acknowledgements

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## GAO Contact

Chris Currie, (404) 679-1875 or [CurrieC@gao.gov](mailto:CurrieC@gao.gov)

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## Staff

In addition to the contact named above, Kathryn Godfrey (Assistant Director), Joseph E. Dewechter (Analyst-in-Charge), Michelle Loutoo Wilson, Ricki Gaber, Dominick Dale, Thomas Lombardi, Ned Malone, David Alexander, Sarah Veale, and Michael Hansen made key contributions to this report.

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## Public Affairs

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