

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

Comptroller General
of the United States

August 13, 2021

The Honorable Alejandro Mayorkas
Secretary of Homeland Security
Washington, D.C. 20528

Priority Open Recommendations: Department of Homeland Security

Dear Secretary Mayorkas:

I appreciated our recent meeting and look forward to a constructive working relationship between our two institutions. As we discussed, the purpose of this letter is to provide an update on the overall status of the Department of Homeland Security's (DHS) implementation of GAO's recommendations and to call your personal attention to areas where open recommendations should be given high priority.¹ In November 2020, we reported that on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.² DHS's recommendation implementation rate was 84 percent. As of March 2021, DHS had 464 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our April 2020 letter, DHS has implemented 12 of our 29 open priority recommendations.

- FEMA Implemented two recommendations for a more accurate methodology for determining premium rates for properties insured by the National Flood Insurance Program (NFIP). These actions will allow FEMA and property owners to better understand the flood risk associated with individual properties and will better inform Congress of the cost of any subsidization of premium rates.
- U.S. Citizenship and Immigration Services' (USCIS) strengthened efforts to assess and address fraud risks within the asylum process. This should help USCIS target its fraud prevention efforts to those areas that are of highest risk.
- U.S. Customs and Border Protection (CBP) developed several statistical models to assess the risk of importer nonpayment of antidumping and countervailing (AD/CV) duties, taxes and fees. The model should enable CBP to better predict the importers' likelihood of nonpayment. The model could also assist CBP in its decision on whether an additional

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

²GAO, *Performance and Accountability Report: Fiscal Year 2020*, [GAO-21-4SP](#) (Washington, D.C.: Nov. 16, 2020).

single transaction bond is required to hedge against the possibility of revenue loss from delinquency on the payment of AD/CV duties, taxes and fees.

- Transportation Security Administration (TSA) implemented three recommendations that strengthened operations by better assessing the effectiveness of the Transportation Worker Identification Credential program, reviewing the performance of its covert testing program, and developing a strategic workforce plan for its surface division. These actions will improve TSA's ability to assess security threats and better position the agency to effectively conduct pipeline security reviews.
- DHS established metrics for assessing the National Cybersecurity and Communications Integration Center's (NCCIC) execution of statutory required cybersecurity functions in accordance with associated implementing principles. This action will better enable the agency to articulate the effectiveness of actions taken to provide cybersecurity incident coordination, information sharing, and incident response across the federal civilian government and critical infrastructure.
- DHS identified the positions in its information technology workforce that performed cybersecurity functions. This action will improve the reliability of the information DHS needs to identify its cybersecurity workforce roles of critical need.
- DHS developed a cybersecurity risk management strategy. By establishing this strategy, DHS should have an improved organization-wide understanding of acceptable risk levels and appropriate risk response strategies to protect its systems and data.
- CBP implemented two recommendations that improved radiological material license verification policies and procedures. These actions will provide greater security in preventing misuse of radiological materials by terrorists.

DHS has 17 priority recommendations remaining from those we identified in the 2020 letter. We ask for your attention to the remaining priority recommendations. We are adding 21 new recommendations. These include five recommendations related to emergency preparedness, eight recommendations related to border security, two recommendations related to transportation security, three recommendations related to infrastructure and management, two recommendations related to cybersecurity and information technology management, and one recommendation related to chemical security bringing the total number of priority recommendations to 38. (See the enclosure for the list of recommendations.)

The 38 priority recommendations fall into the following six major areas.

Emergency Preparedness and Response. We have seven priority recommendations in this area. NFIP has been on our high-risk list since 2006, and while we have emphasized the need for Congress to enact comprehensive reform of the program, we have also identified actions that the Federal Emergency Management Agency (FEMA) could take to improve its administration.

In August 2009, we recommended that FEMA annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates for Write-Your-Own (WYO) companies. In April 2021, FEMA officials explained that they had established goals, outputs, and milestones related to analyzing various aspects of WYO compensation. Specific to

this recommendation, FEMA's Expense Analysis Working Group (established in November 2020) is tasked with analyzing WYO financial data and has drafted a procedures manual for determining profit margins which they estimate will be completed in summer 2021. An annual analysis of WYO insurers' actual expenses and profit would provide greater transparency and accountability over existing payments before a new rule is finalized.

In September 2012, we recommended that FEMA develop a methodology to better assess a jurisdiction's capability to respond to and recover from a disaster without federal assistance. The Disaster Recovery Reform Act of 2018³ included a provision that required FEMA to update the factors considered when evaluating a request for a major disaster declaration for public assistance, specifically the estimated cost of assistance (i.e., the per capita indicator).⁴ In December 2020, FEMA initiated a proposal to better account for increases in inflation and each state's total taxable income. The public comment period for the proposal continued through April 12, 2021, and FEMA is considering the comments.

Further, in May 2020, we recommended that FEMA develop a plan—with time frames and milestones and input from field leadership—to provide more reliable and complete information to field leaders and managers about staff knowledge, skills, and abilities. According to FEMA officials, the agency has taken steps to enhance the FEMA Qualification System's coach-and-evaluator program, such as implementing assessments to ensure greater reliability for personnel who receive qualification status. In addition, FEMA officials stated that they conducted a listening session in April 2021 with field leadership to gather input on the FEMA Qualification System. As of May 2021, officials said that as a result of this session, they plan to conduct a training needs analysis on individual responders and establish guidelines to help standardize coach-and-evaluator selection and activity, among other initiatives. Officials expect to complete these initiatives by September 2021. However, in order to address the complex and interrelated challenges with the agency's qualification and deployment processes we identified in our report, it will be important for FEMA to take a comprehensive approach and consider solutions with input from field leadership that may cut across multiple processes and systems.

We concurrently recommended in May 2020 that FEMA develop mechanisms, including collecting relevant data, to assess how effectively FEMA's disaster workforce was deployed to meet mission needs in the field. FEMA officials stated that the agency is making progress toward meeting the force structure targets it established in 2019 and has a process in place to modify the targets on an annual basis if needed. As of May 2021, FEMA officials said that they have been working with the cadres in headquarters to incorporate field leadership feedback into this process. While implementing our recommendation could include similar inputs as this planning process, it is focused on FEMA collecting feedback from field leadership and relevant data on the extent to which its deployment processes and decisions (e.g., number and timing of deployments) met field needs during disasters; this effort may involve considerations in addition to revising force structure targets. This would provide FEMA headquarters officials with critical information to assess whether its deployment strategies effectively placed staff with the right skills in the right place at the right time to meet mission needs and take corrective actions if necessary.

³Pub. L. No. 115-254, § 1239, 132 Stat. 3438, 3466.

⁴85 Fed. Reg. 80,719 (Dec. 20, 2020).

In September 2020, we recommended that FEMA identify and implement strategies to provide additional information to applicants about how FEMA determined their eligibility for assistance and the amount of assistance to award. In March and August 2021, officials stated that FEMA's Correspondence Revision Workgroup reviewed its eligibility notification letters to ensure alignment with updated policy, procedures, and plain language. They found that due to software limitations, FEMA is unable to include the damages verified during the inspection, or the factors used in its award decisions. However, officials stated that FEMA will continue to conduct a review of the letters and plans to implement any revisions by April 2022. To fully implement this recommendation, FEMA will need to ensure that the letters use plain language and include a description of how FEMA makes eligibility decisions. Taking these actions will improve FEMA's ability to provide information to its applicants about their eligibility for assistance.

In October 2014, we recommended that FEMA consider amending NFIP minimum standards for floodplain management to incorporate, as appropriate, forward-looking standards, similar to the minimum standard adopted by the Hurricane Sandy Rebuilding Task Force. FEMA agreed with this recommendation, but has not implemented it as of April 2021. Implementing this recommendation to improve the long-term resilience of insured structures may help decrease federal fiscal exposure to climate change.

In September 2020, we recommended that FEMA—one of the agencies leading the COVID-19 response through the Unified Coordination Group—consistent with its roles and responsibilities, should work with relevant federal, state, territorial, and tribal stakeholders to devise interim solutions, such as systems and guidance and dissemination of best practices, to help states enhance their ability to track the status of supply requests and plan for supply needs for the remainder of the COVID-19 pandemic response.

DHS disagreed with this recommendation, noting, among other things, work that FEMA had already done to manage the medical supply chain and increase supply availability. Although FEMA disagreed with our recommendation, it began taking some action in March 2021. We note that we made this recommendation to both DHS and HHS with the intent that they would work together under the Unified Coordination Group to address challenges reported by state officials with both public health and emergency management responsibilities. Although both DHS and HHS have reported separate actions, taken as part of other efforts within each separate purview, neither has articulated how they worked with the other nor how they assessed whether the actions changed the experiences of state officials who reported issues during our prior work. Without systematic and deliberate action to help states ensure they have the support they need to track and plan for supplies, states, tribes, and territories on the front lines of the whole-of-nation COVID-19 response may continue to face challenges that hamper their effectiveness.

Border Security. We have 14 priority recommendations in this area. In March 2014, we recommended that CBP analyze data to determine the contribution of surveillance technologies to CBP's border security efforts. The U.S. Border Patrol has taken steps to address this recommendation. In September 2020, CBP officials briefed us on their efforts to develop a model that uses quantitative and qualitative analysis that will help Border Patrol determine what resources, including technology, would benefit operations. In July 2021, CBP reported that Border Patrol was continuing to develop this model and it was on track to be completed in fiscal year 2022. We view these efforts, as described, as important progress toward fulfilling our recommendation; however, it is too soon to tell whether the model will fully address the intent of our recommendation.

In February 2017, we made a recommendation to DHS to develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border. Developing metrics to assess the contributions of fencing to border security operations could better position DHS to make resource allocation decisions. In September 2020, CBP officials briefed us on their efforts to develop a model that uses quantitative and qualitative analysis that will help Border Patrol determine what resources, including fencing, would benefit Border Patrol's operations. In July 2021, CBP reported that Border Patrol was continuing to develop this model and it was on track to be completed in fiscal year 2022. We view these efforts, as described, as important progress toward fulfilling our recommendation; however, it is too soon to tell whether the model will fully address the intent of our recommendation.

In July 2016, we made two recommendations to CBP: one on improving the management of the AD/CV duty liquidation process and one on improving the risk management in its collection of AD/CV duties. As of July 2021, CBP had taken steps to address each of these recommendations, but additional steps are still needed. CBP had begun tracking some liquidation processing errors. CBP's main effort to reduce the number of untimely liquidations focuses on increasing uniformity in the liquidation process through additional training, automation, and better guidance. However, it does not collect or analyze data on the effects of these liquidations on revenue. From July 2016 to May 2021, CBP took steps to develop a risk-based framework, including the use of a risk-based single transaction bond. In June 2021, CBP announced that it would not implement the risk-based single transaction bond due in part to the complexity of the framework in determining if an additional risk-based single transaction bond was needed and in what amount. CBP announced that it would instead implement a risk-based framework by leveraging existing authorities and completing several initiatives, including automating its bond sufficiency checks. CBP stated that it intends to complete the process of updating its existing authorities and fully automating bond sufficiency checks by September 30, 2021.

In July 2018, we recommended that CBP analyze the costs associated with future barrier segments along the southwest border and include cost as a factor in the Impedance and Denial Prioritization Strategy. DHS concurred with the recommendation. Most recently, in March 2021, CBP officials stated that this cost information may affect how the construction projects are executed, but that it would not influence how CBP prioritizes barrier construction projects across various locations. To fully implement our recommendation, CBP needs to analyze the costs associated with future barrier construction projects and incorporate that analysis into how it prioritizes construction of barriers in certain border locations. We continue to believe that implementing this recommendation would provide CBP greater assurance that it is using its limited resources in the most cost-effective manner.

In July 2015, we recommended that DHS and the Department of Health and Human Services (HHS) jointly develop and implement a documented interagency process with clearly defined roles and responsibilities for all agencies involved in the referral and placement of unaccompanied children in HHS shelters. In February 2020, we reported that DHS and HHS had not resolved long-standing differences in opinion about how and what information agencies are to share related to the care and placement of unaccompanied children, including those referred to HHS after a family separation. In particular, HHS officials identified additional information they need from DHS about those adults apprehended with children and later separated. We recommended that DHS and HHS collaborate to address the information sharing gaps we identified. As of March 2021, DHS and HHS are developing new data systems to help track and share information about unaccompanied children, including separated children. In March 2021, DHS components and HHS signed a memorandum of agreement on

unaccompanied children information sharing that outlines the use of HHS's new system, among other things.

DHS and HHS reported that they would provide an update on the status of their efforts by September 2021; it is too soon to tell if these efforts will fully address the intent of these two recommendations. Increased collaboration between DHS and HHS would better position HHS to make informed and timely decisions for unaccompanied children.

In February 2020, we made two recommendations to DHS to address fragmentation in its processes for identifying and sharing information about noncitizen family members apprehended at the southwest border. In June 2020, DHS's Office of Immigration Statistics launched an interagency group that includes subject matter experts and data system managers. The group's mandate includes drafting common DHS-wide and interagency data standards for all information on noncitizen family members. DHS also plans to work with relevant components to develop a unique, shared identifier linking family members apprehended together. As of May 2021, these actions are underway and DHS expects to complete them by September 30, 2021. Identifying and communicating department-wide information needs with respect to family members should help provide DHS with greater assurance that its components are identifying all individuals who may be eligible for relief from removal from the U.S. based on their family relationships.

In July 2020, we recommended that CBP develop and implement oversight mechanisms for CBP's implementation of policies and procedures relating to medical care for individuals in its custody, to include documentation of expected practices, metrics and corresponding performance targets, and roles and responsibilities for taking corrective action. As of March 2021, officials stated that CBP is taking a variety of steps to implement our recommendation, including incorporating medical quality management requirements into its medical support contract and developing a protocol for management inspections at CBP facilities. According to CBP officials, CBP expects to complete these efforts in September 2021. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's oversight mechanisms, once implemented, to determine whether CBP has fully implemented our recommendation.

In December 2019, we made three recommendations to CBP to improve its drawback claim validation activities to help mitigate risks of improper payments in the drawback program.⁵ Specifically, we recommended that CBP take steps to (1) address excessive export submissions across multiple claims, (2) develop a plan to establish a reliable system of record for proof of export, and (3) enable the Automated Commercial Environment's (ACE) claim targeting feature and retroactively target claims for review that were accepted into ACE when the selection feature was disabled. As we reported in December 2019, if these steps reduced drawback-related costs by even 1 percent of the over \$1 billion in annual drawback refunds, this could equate to millions of dollars in savings. As of April 2021, CBP officials said they are taking steps that they expect to complete by January 2022—such as developing a proposal and plan to effectively track export submissions and correcting the ACE's targeting feature—to implement our recommendations. These efforts are important progress toward fulfilling our

⁵Through the drawback program, CBP refunds up to 99 percent of duties, taxes, or fees previously paid by an importer. CBP makes these refunds on imported goods on which the importer previously paid duties, taxes, or fees, and subsequently exported from the United States or destroyed.

recommendations; however, it is too soon assess if they fully address the intent of our recommendations.

In February 2021, we recommended that DHS, together with the Department of Defense (DOD), define a common outcome for DOD's support to DHS. This recommendation is intended to enhance coordination of interagency efforts to provide support to DHS's current border security mission and provide both departments with information needed to plan for effective border operations. In order to address our recommendation, the department needs to come to an agreement with DOD on the desired outcome for DOD's support to CBP's southern border operations beyond the current fiscal year. This agreement could be documented in a number of ways and, in April 2021, CBP and Border Patrol officials told us that DHS is considering several options for acting on this recommendation. We will continue to monitor DHS's progress.

Transportation Security. We have two priority recommendations in this area. In December 2018, we recommended improvements in TSA's methods for assessing pipeline security risks. Specifically, we recommended that the TSA Administrator direct the Security Policy and Industry Engagement's Surface Division to identify or develop other data sources relevant to threat, vulnerability, and consequence consistent with the National Infrastructure Protection Plan and DHS critical infrastructure risk mitigation priorities and incorporate that data into the Pipeline Relative Risk Ranking Tool to assess relative risk of critical pipeline systems. The agency agreed with the recommendation and, as of March 2021, took steps to address it, such as meeting with other federal agencies and a contractor for input on how best to address the recommendation. However, TSA has not yet identified or developed additional data sources relevant to pipeline threats, vulnerability, and consequence as we recommended.

We also recommended that the TSA Administrator direct the Security Policy and Industry Engagement's Surface Division to take steps to coordinate an independent, external peer review of its Pipeline Relative Risk Ranking Tool, after the Pipeline Security Branch completes enhancements to its risk assessment approach. TSA officials reported that, as of March 2021, they have not fully completed the enhancements and therefore have not taken steps toward a peer review. As noted in our recommendation, it is first necessary to implement enhancements to TSA's risk assessment approach before launching a peer review.

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

To address these two recommendations, the department and other stakeholders have made revisions to the DHS headquarters consolidation plan, and DHS is required to submit a current

plan to congressional committees.⁶ However, the time frame for DHS submitting this information is not clear because the plan is undergoing additional revisions and review. Given the magnitude of the headquarters consolidation project—in terms of its multi-billion dollar cost and its profound impact on future departmental operations—it will be important for the updated plan to include a robust analysis of current and future needed capabilities, among other things.

In October 2017, we recommended that the Coast Guard establish a plan with target dates and milestones for closing boat stations that it has determined provide overlapping search and rescue coverage and are unnecessarily duplicative. We also recommended that the Coast Guard take action to close the identified stations according to its plan and target dates. As of April 2021, the Coast Guard consolidated four stations with larger adjacent stations and anticipates that their divestiture will take years. However, the Coast Guard continues to evaluate redundant stations for closure as part of its boat optimization process, and stations identified as redundant may be recommended for closure in future budget submissions. DHS, through the Coast Guard, should close boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

In February 2019, we recommended that the Coast Guard employ models for its shore infrastructure asset lines to predict the outcome of investments, analyze trade-offs, and optimize decisions among competing investments. Employing models to predict the future condition and performance of facilities could potentially identify and achieve cost savings, according to leading practices. DHS agreed with our recommendation, but as of April 2021, the Coast Guard had not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternative models for its asset lines, and estimated that it will complete this analysis and fully implement a modeling solution by the end of September 2023.

In February 2020, we reported that the Coast Guard had assessed a small portion of its workforce needs and recommended it update its April 2018 Manpower Requirements Plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units. DHS stated that the Coast Guard's Assistant Commandant for Human Resources Directorate would update its Manpower Requirements Plan during the next periodic report submitted to Congress, due in fiscal year 2022. In February 2021, the Coast Guard estimated completing the effort by March 31, 2022.

In December 2020, we recommended the Coast Guard ensure that its National Vessel Documentation Center (NVDC) conducts a full cost study of its commercial and recreational user fees. In concurring with our recommendation, the Coast Guard stated that the NVDC will conduct a full cost study of its commercial and recreational user fees, with oversight provided as needed by the Director of Operations Resource Management for the Deputy Commandant for Operations. DHS stated that the NVDC would do so after the Coast Guard develops a new information technology system to allow the NVDC to accurately assess the actual costs of providing services to the public, including new information technology support costs. DHS estimated that it would obtain delivery of the new information technology system by March 31, 2022, and conduct the full cost study by December 31, 2022.

In January 2021, we recommended that the DHS Office of the Chief Human Capital Officer (OCHCO) should monitor components' implementation of the Office of Personnel Management (OPM) action planning cycle to ensure the components review and assess the results of their actions to adjust, reprioritize, and identify new actions needed to improve employee

⁶Pub. L. No. 114-150, 130 Stat. 366 (2016).

engagement. In response, in March 2021, OCHCO issued written guidance that includes mechanisms to monitor components implementation of the OPM action planning cycle. In April 2021, OCHCO officials stated they plan to use these mechanisms to ensure components track and document the results of their employee engagement action planning efforts. To fully implement this recommendation, OCHCO will need to demonstrate that their new monitoring framework ensures that components consistently review and assess the results of their employee engagement action planning efforts and use these assessments to adjust, reprioritize, and identify new actions to improve employee engagement.

Information Technology and Cybersecurity. We have five priority recommendations in this area. In February 2017, we recommended that DHS establish methods for monitoring the implementation of cybersecurity functions against the principles identified in the National Cybersecurity Protection Act of 2014 on an ongoing basis.⁷ In March 2021, DHS has demonstrated that it had developed metrics for assessing adherence to applicable principles in carrying out statutorily required functions. However, to fully implement this recommendation, DHS needs to show evidence that the metrics are reported on an on-going basis.

To facilitate adoption of the National Institute of Standards and Technology's (NIST) *Framework for Improving Critical Infrastructure Cybersecurity*, we recommended in February 2018 that DHS take steps to consult with respective sector partners, such as the sector coordinating councils, and NIST, as appropriate, to develop methods for determining the level and type of adoption of the framework by entities across their respective sectors.

From October through December 2019, DHS, in coordination with its Information Technology (IT) sector partner, administered a survey to approximately 100 small and midsized businesses (with 50 percent representing IT sector organizations) to gather information on, among other things, their level of framework adoption and use in conjunction with other cybersecurity standards. However, the survey did not measure the level and type of framework adoption by entities across DHS's other critical infrastructure sectors, such as the communications and critical manufacturing sectors. While the department has taken important initial steps to measure framework adoption and use for a portion of the IT sector and has developed sector-specific framework implementation guidance for other sectors, implementing our recommendations to gain a more comprehensive understanding of the framework's use by all of its critical infrastructure sectors is essential to understanding the success of efforts to protect our nation's critical infrastructure from cyber threats and where to focus limited resources for cyber risk mitigations.

In July 2019, we recommended that DHS document a process for coordination between its cybersecurity risk management and enterprise risk management functions. DHS concurred with our recommendation and stated that it planned to clarify cybersecurity roles and responsibilities for coordination with offices responsible for enterprise risk management. DHS estimated that it would complete these actions by July 31, 2020. For us to consider this recommendation fully implemented, DHS needs to provide details on how coordination occurs between entities responsible for cybersecurity and those responsible for enterprise risk management.

In February 2020, we recommended that DHS develop a schedule and plan for completing a reassessment of the high value asset (HVA) program process which focuses on the protection

⁷These principles include, for example, ensuring that cybersecurity products are developed and disseminated based on timely, actionable, and relevant information.

of the government's most critical and high impact information and information systems. This included addressing issues on completing required high value asset assessments and identifying needed resources for Tier 1 assets and assessments, and finalizing guidance for Tier 2 and 3 HVA systems. DHS concurred with our recommendation. In December 2020, DHS stated that while it was not on track to complete required Tier 1 assessments, it was working to address the assessment constraints, including increasing staffing levels and developing process improvements. However, it has yet to provide a schedule and plan for completing these assessments and improvements. Further, in March 2021, DHS stated that it has developed standardized training to develop resources for completing HVA assessments. DHS stated that its training capability will be fully operational in May 2021. However, it will only be able to train about one third of the people required in this fiscal year due to budget constraints. Training dates for the next two fiscal year years, which are needed to have enough people to conduct the required assessments, are still pending. Further, DHS stated that it has drafted supplemental guidance for Tier 2 and 3 HVAs (now called non-Tier-1 assets). However, the guidance that it had hoped to publish in March 2021 has not yet been completed.

In June 2020, we recommended that DHS begin measuring results associated with its transition to Agile software development and measuring the success of the transition based on its impact on the department.⁸ DHS concurred with our recommendation. In July 2021, DHS's Acting Chief Technology Officer approved an updated Agile Software Delivery Core Metrics Guidebook. The guidebook explains that programs must report monthly on six Agile core metrics (e.g., availability, cycle time, and unit test coverage) in DHS's Investment Evaluation Submission and Tracking system. In addition, in August 2021, DHS noted that these metrics are included as part of its Program Health Assessments for major and standard IT programs across the department. DHS also stated that the Office of the Chief Information Officer has informed programs that non-compliance will result in an adverse Program Health Assessment score. According to DHS, these measurements will ensure that the DHS Agile transition is successful. Nevertheless, DHS did not provide evidence to demonstrate that the updated metrics are being collected and used to measure results associated with its transition to Agile and the success of the transition based on its impact on the department.

Chemical and Nuclear Security. We have two priority recommendations in this area. In August 2018, we recommended the Assistant Secretary for DHS's Countering Weapons of Mass Destruction (CWMD) Office develop a strategy and implementation plan to help DHS guide, support, integrate, and coordinate chemical defense programs and activities. CWMD officials provided us with the completed strategy in December 2019 and plan to complete the implementation plan by September 1, 2021. We will continue to monitor the status of the implementation plan. Completion of both documents is essential to help CWMD guide DHS's efforts to address fragmentation and coordination issues and is consistent with the office's aim to establish a coherent mission.

In May 2020, we recommended that the Assistant Director of the Cybersecurity and Infrastructure Security Agency's (CISA) Infrastructure Security Division develop a workforce plan for the Chemical Facility Anti-Terrorism Standards program that addresses the program's cybersecurity-related needs and include an analysis of any gaps in the program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address

⁸In April 2016, DHS started transitioning to Agile software development to help improve its IT acquisitions. Agile focuses on collaborative processes and workflows to quickly and frequently deliver working software.

them. The agency agreed with the recommendation and as of April 2021 was taking steps to address it, such as developing documentation to guide the workforce planning process.

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In March 2021, we issued our biennial update to our [High-Risk List](#), which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.⁹ One of our high-risk areas, [strengthening DHS management functions](#), centers directly on DHS. Another high-risk area is related to FEMA's management of the [National Flood Insurance Program](#).

Several other government-wide high-risk areas also have direct implications for DHS and its operations. These include (1) [improving the management of IT acquisitions and operations](#), (2) [improving strategic human capital management](#), (3) [managing federal real property](#), (4) [ensuring the cybersecurity of the nation](#),¹⁰ and (5) [government-wide personnel security clearance process](#). We urge your attention to the government-wide high-risk issues as they relate to DHS. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within DHS.

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees including the Committees on Appropriations, Budget, Homeland Security and Governmental Affairs, and Judiciary, United States Senate; and the Committees on Appropriations, Budget, Homeland Security, Judiciary, and Oversight and Reform, House of Representatives.

In addition, the report will be available on the GAO website at <http://www.gao.gov>.

⁹GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: Mar. 2, 2021).

¹⁰With regard to cybersecurity, we also urge you to use foundational information and communications technology supply chain risk management practices set forth in our December 2020 report: GAO, *Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks*, [GAO-21-171](#) (Washington, D.C.: Dec. 15, 2020).

I appreciate DHS's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Charles Michael Johnson, Jr., Managing Director, Homeland Security and Justice Team at JohnsonCM@gao.gov or (202) 512-8777. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 464 open recommendations, as well as those additional recommendations in the high-risk areas for which DHS has a leading role. Thank you for your attention to these matters.

Sincerely yours,

A handwritten signature in black ink that reads "Gene L. Dodaro". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Gene L. Dodaro

Comptroller General of
the United States

Enclosure – 1

cc:

John K. Tien, Deputy Secretary
Randolph D. "Tex" Alles, Deputy Under Secretary for Management
Deanne Criswell, Administrator, Federal Emergency Management Agency
Troy Miller, Acting Commissioner, U.S. Customs and Border Protection
Ur Mendoza Jaddou, Director, U.S. Citizenship and Immigration Services
Rodney S. Scott, Chief, United States Border Patrol
David Pekoske, Administrator, Transportation Security Administration
Admiral Karl L. Schultz, Commandant of the Coast Guard, U.S. Coast Guard
Angela Bailey, Chief Human Capital Officer, Office of the Chief Human Capital Officer
Jen Easterly, Director, Cybersecurity and Infrastructure Security Agency (CISA)
Eric Hysen, Chief Information Officer (CIO)
Bill Pratt, Director, Strategic Technology Management, Office of the Chief Technology Officer, OCIO
Gary Rasicot, Acting Assistant Secretary, Countering Weapons of Mass Destruction Office
Dr. David Mussington, Executive Assistant Director for Infrastructure Security, CISA
Kelli Ann Burriesci, Acting Under Secretary, Office of Strategy, Policy, and Plans
The Honorable Shalanda Young, Acting Director, Office of Management and Budget

Enclosure

Priority Open Recommendations to the Department of Homeland Security (DHS)

Emergency Preparedness and Response

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

Recommendation: To provide transparency and accountability over the payments FEMA makes to Write-Your-Own (WYO) for expenses and profits, the Secretary of Homeland Security should direct the FEMA Administrator to annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates.

Action Needed: FEMA initially did not concur with this recommendation. To fully implement it, FEMA will need to develop and implement a process to annually analyze WYO expense and profit data and compare it to the rates it uses to compensate WYOs. Subsequent to issuance of our report Congress passed the Biggert-Waters Flood Insurance Reform Act of 2012, which required that FEMA develop a methodology for determining the amount to pay insurers using actual expense data and issue a rule to formulate revised expense reimbursements to be structured to track insurers' actual flood-related expenses as practicably possible.¹¹ On July 2019, FEMA issued an Advance Notice of Proposed Ruling seeking comments by September 6, 2019 regarding possible approaches to incorporating actual flood insurance expense data into the WYO payment methodology. As of February 2020, FEMA officials said that they would complete an annual analysis of WYO data by the end of fiscal year 2020 and that they were reviewing comments received in response to the July 2019 notice. In April 2021, FEMA officials explained that they had established goals, outputs, and milestones related to analyzing various aspects of WYO compensation. Specific to this recommendation, FEMA's Expense Analysis Working Group (established in November 2020) has drafted a procedures manual for determining WYO profit margins that they estimate will be completed in summer 2021. This group is also tasked with reviewing and analyzing WYO financial data.

High Risk Area: National Flood Insurance Program

Director: Alicia Puente Cackley, Financial Markets and Community Investment

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

Recommendation: To increase the efficiency and effectiveness of the process for disaster declarations, the FEMA Administrator should develop and implement a methodology that provides a more comprehensive assessment of a jurisdiction's capability to respond to and recover from a disaster without federal assistance. This should include one or more measures of a jurisdiction's fiscal capacity, such as Total Taxable Resources, and consideration of the jurisdiction's response and recovery capabilities. If FEMA continues to use the Public Assistance per capita indicator to assist in identifying a jurisdiction's capabilities to respond to and recover from a disaster, it should adjust the indicator to accurately reflect the annual

¹¹Pub. L. No. 112-141, div. F, title II, § 100224(b)-(e), 126 Stat. 936, 937.

changes in the U.S. economy since 1986, when the current indicator was first adopted for use. In addition, implementing the adjustment by raising the indicator in steps over several years would give jurisdictions more time to plan for and adjust to the change.

Action Needed: FEMA agreed with this recommendation. The Disaster Recovery Reform Act of 2018, signed into law October 5, 2018,¹² directed FEMA to update the factors considered when evaluating a request for a major disaster declaration for public assistance, specifically the estimated cost of assistance (i.e., the per capita indicator).¹³ In December 2020, FEMA issued a proposed rule to increase the per capita indicator to account for increases in inflation from 1986 to 1999, and to adjust the individual states' indicators by their total taxable resources. FEMA also proposed to increase the minimum threshold by accounting for inflation from 1999 to 2019, and annually thereafter. The public comment period closed on April 12, 2021, and FEMA is in the processes of considering comments and revising the proposed rule accordingly. Until FEMA implements a new methodology, it will not have an accurate assessment of a jurisdiction's capabilities to respond to and recover from a disaster without federal assistance and runs the risk of recommending that the President award Public Assistance to jurisdictions that have the capability to respond and recover without federal assistance.

High Risk Area: Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks

Director: Christopher P. Currie, Homeland Security and Justice

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FEMA Disaster Workforce: Actions Needed to Address Deployment and Staff Development Challenges. [GAO-20-360](#). Washington, D.C.: May 4, 2020.

Recommendation: The FEMA Administrator should develop a plan—with time frames and milestones and input from field leadership—to address identified challenges that have hindered FEMA's ability to provide reliable and complete information to field leaders and managers about staff knowledge, skills, and abilities.

Action Needed: FEMA concurred with this recommendation. According to FEMA officials, the agency has taken steps to enhance the FEMA Qualification System's coach-and-evaluator program, such as implementing assessments to ensure greater reliability for personnel who receive qualification status. In addition, FEMA officials stated that they conducted a listening session in April 2021 with field leadership to gather input on the FEMA Qualification System.

As of May 2021, officials said that as a result of this session, they plan to conduct a training needs analysis on individual responders and establish guidelines to help standardize coach-and-evaluator selection and activity, among other initiatives. Officials expect to complete these initiatives by September 2021. However, in order to address the complex and interrelated challenges with the agency's qualification and deployment processes we identified in our report, it will be important for FEMA to take a comprehensive approach and consider solutions with input from field leadership that may cut across multiple processes and systems.

¹²Pub. L. No. 115-254, § 1239, 132 Stat. 3438, 3466.

¹³85 Fed. Reg. 80,719 (Dec. 20, 2020).

Recommendation: The FEMA Administrator should develop mechanisms, including collecting relevant data, to assess how effectively FEMA's disaster workforce was deployed to meet mission needs in the field.

Action Needed: FEMA concurred with this recommendation. FEMA officials stated that the agency is making progress toward meeting the force structure targets it established in 2019 and has a process in place to modify the targets on an annual basis if needed. As of May 2021, FEMA officials said that they have been working with the cadres in headquarters to incorporate field leadership feedback into this process. While implementing our recommendation could include similar inputs as this planning process, our recommendation is focused on FEMA collecting feedback from field leadership and relevant data on the extent to which its deployment processes and decisions (e.g., number and timing of deployments) met field needs during disasters, which may involve considerations beyond revising force structure targets. This would provide FEMA headquarters officials with critical information to assess whether its deployment strategies effectively placed staff with the right skills in the right place at the right time to meet mission needs and take corrective actions if necessary.

Director: Christopher P. Currie, Homeland Security and Justice

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Disaster Assistance: Additional Actions Needed to Strengthen FEMA's Individuals and Households Program. [GAO-20-503](#). Washington, D.C.: September 30, 2020.

Recommendation: The FEMA Administrator should identify and implement strategies to provide additional information to applicants about how FEMA determined their eligibility for assistance and the amount of assistance to award.

Action Needed: FEMA agreed with this recommendation. Officials stated that FEMA will include a review of all the Individuals and Households Program (IHP) award letters as part of the 2020-2021 letter review process to ensure the use of plain language and a description of how FEMA makes eligibility decisions. In March and August 2021, officials stated that as part of the 2020-2021 letter review, FEMA created the Correspondence Revision Workgroup, which reviewed IHP's eligibility notification letters to ensure alignment with updated policy, procedures, and plain language. The Workgroup found that due to software limitations, FEMA is unable to include the damages verified during the inspection, or factors used in its award decisions. However, officials stated that FEMA will continue to further conduct a review of the letters and plans to implement any revisions by April 2022.

Director: Christopher P. Currie, Homeland Security and Justice

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Climate Change: Better Management of Exposures in Potential Future Losses is Needed for Federal Flood and Crop Insurance. [GAO-15-28](#). Washington, D.C.: October 29, 2014.

Recommendation: To promote forward-looking construction and rebuilding efforts while FEMA phases out most subsidies, the Secretary of the Department of Homeland Security should direct FEMA to consider amending NFIP minimum standards for floodplain management to incorporate, as appropriate, forward-looking standards, similar to the minimum standard adopted by the Hurricane Sandy Rebuilding Task Force.

Action Needed: FEMA agreed with this recommendation. Since our 2015 report, FEMA has taken some steps to consider future conditions in its flood risk products. For example, FEMA has conducted several pilot studies on sea level rise and is working to identify specific research gaps to inform the design of additional future conditions pilot projects, according to a FEMA official. However, FEMA has yet to take action to incentivize climate resilience by incorporating it into the requirements for receiving payments from the federal flood insurance program. In August 2019, an official stated that FEMA intends to implement the recommendation in full eventually, but it is unlikely that it will happen as a cohesive effort, given other ongoing flood insurance reforms.

As noted in its FY2022 budget justification, we concur that FEMA's efforts updating the current flood insurance regulation may meet the intent of this recommendation. However, FEMA does not have a timeframe for completing its update to the floodplain management minimum standards.¹⁴

High Risk Area: Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks

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COVID-19: Federal Efforts Could Be Strengthened by Timely and Concerted Actions.
[GAO-20-701](#). Washington, D.C.: September 21, 2020.

Recommendation: The Administrator of the Federal Emergency Management Agency—one of the agencies leading the COVID-19 response through the Unified Coordination Group—consistent with its roles and responsibilities, should work with relevant federal, state, territorial, and tribal stakeholders to devise interim solutions, such as systems and guidance and dissemination of best practices, to help states enhance their ability to track the status of supply requests and plan for supply needs for the remainder of the COVID-19 pandemic response.

Action Needed: In September 2020, DHS disagreed with this recommendation, noting, among other things, the work that FEMA had done to manage the medical supply chain and increase supply availability. Although FEMA disagreed with our recommendation, it began taking some action in March 2021. However, as of May 2021, FEMA has not demonstrated action to devise interim solutions that would systematically help states, tribes, and territories effectively track, manage, and plan for supplies to carry out the COVID-19 pandemic response in the absence of state-level end-to-end logistics capabilities that would track critical supplies required for a response of this scale.

We note that we made this recommendation to both DHS and HHS with the intent that they would work together under the Unified Coordination Group to address challenges reported by state officials with both public health and emergency management responsibilities. Moreover, we recommended they take actions that were consistent with the roles and responsibilities that were to be more clearly defined as HHS took a more central role in leading supply distribution. Although both DHS and HHS have reported separate actions, taken as part of other efforts within each separate purview, neither has articulated how they worked with the other nor how

¹⁴*Department of Homeland Security Implementation Status of Public Recommendations, Supplement to Annual Budget Justification for Fiscal Year 2022, May 28, 2021.*

they assessed whether the actions changed the experiences of state officials who reported issues during our prior work. Without taking systematic and deliberate action to help states ensure they have the support they need to track and plan for supplies, states, tribes, and territories on the front lines of the whole-of-nation COVID-19 response may continue to face challenges that hamper their effectiveness. Until DHS and HHS articulate how they will work together and coordinate their actions this recommendation will remain open.

Director: Christopher P. Currie, Homeland Security and Justice

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Border Security

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

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

Action Needed: CBP agreed with our recommendation. Since our 2014 report, CBP expanded its Arizona Border Surveillance Technology Plan to the Southwest Border Technology Plan. Among other things, in March 2019, Border Patrol added a capability for its officials to generate a report with performance data for surveillance technologies, and, in February 2020, Border Patrol officials stated the data gathered in the report were reliable. Officials provided examples of how they use performance data to help identify gaps in capabilities and inform future investments in surveillance technologies.

In addition, in September 2020, CBP officials provided us with a briefing on its efforts to develop a model that uses quantitative analysis and qualitative field insight to depict the Border Patrol's Mission Essential tasks (METs) across any area of operations. According to these officials, the goal of the model is to depict the overall balance of constraints and enablers that affect a station's current potential to perform Border Patrol's METs within its area of responsibility. Officials added that this model will help Border Patrol determine what resources, including technology, would benefit operations. In July 2021, CBP reported that Border Patrol was continuing to develop this model and it was on track to be completed in fiscal year 2022. We view these efforts, as described, as important progress toward fulfilling our recommendation; however, it is too soon to tell whether the model will fully address the intent of our recommendation.

Director: Rebecca S. Gambler, Homeland Security and Justice

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

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

Action Needed: DHS agreed with this recommendation and stated that it planned to develop metrics in its operational control framework for border security operations. To fully implement it, the Border Patrol should complete its efforts to develop metrics for assessing the contributions of pedestrian and vehicle fencing to border security operations and apply these metrics when making resource allocation decisions. DHS stated that they have developed and are testing initial metrics and they will continue to gather data to identify if these metrics are accurately representing realities in the field. In September 2020, CBP officials provided a briefing on its efforts to develop a model that uses quantitative analysis and qualitative field insight to depict the Border Patrol's METs across any area of operations. According to these officials, the goal of the model is to depict the overall balance of constraints and enablers that affect a station's current potential to perform Border Patrol's METs within its area of responsibility. Officials added that this model will help determine what resources, including fencing, would benefit Border Patrol's operations. In July 2021, CBP reported that Border Patrol was continuing to develop this model and it was on track to be completed in fiscal year 2022. We view these efforts, as described, as important progress toward fulfilling our recommendation; however, it is too soon to tell whether the model will fully address the intent of our recommendation.

Director: Rebecca S. Gambler, Homeland Security and Justice

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

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

Action Needed: DHS concurred with this recommendation. As of July 2021, CBP had taken some steps to implement this recommendation, but had not fully implemented it. CBP has issued guidance to collect and analyze untimely AD/CV liquidations data and now regularly collects some untimely liquidation data. CBP's main effort to reduce the number of untimely liquidations focuses on increasing uniformity in the process of liquidating entries, through additional training and by updating its guidance to provide detailed instructions for liquidating entries and developing modules within CBP's information system to guide and manage the review, and oversight of AD/CV duty entries. However, CBP does not report on the revenue effects of untimely AD/CV liquidations; agency officials say they do not calculate this because

calculating the revenue effects of these liquidations is too labor intensive, involving having to comb through sometimes complex liquidation instructions over a number of years.

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

Action Needed: DHS concurred with this recommendation. From July 2016 to May 2021, CBP took steps to develop a risk-based framework, including the use of a risk-based single transaction bond. In June 2021, CBP announced that it would not implement the risk-based single transaction bond due in part to the complexity of the framework in determining if an additional risk-based single transaction bond was needed and in what amount. CBP announced that it would instead implement risk-based framework by leveraging existing authorities and completing several initiatives. Among other things, using its existing bond formula and processes CBP plans to leverage its authorities to require the purchase of an additional single transaction bond by updating its internal guidance and procedures to better define when to consider the use of single transaction bonds. CBP also said that it plans to fully automate its continuous bond sufficiency checks.

Director: Kimberly M. Gianopoulos, International Affairs and Trade

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

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

Action Needed: CBP agreed with this recommendation. CBP officials stated that, after prioritizing locations, CBP conducts detailed cost estimates as part of the acquisitions process. Most recently, as of March 2021, CBP officials stated that this cost information may affect how the construction projects are executed, but that it would not influence how CBP prioritizes barrier construction projects across various locations. As we have previously reported, organizations should use an integrated approach to the requirements, acquisitions, and budget processes to prioritize needs and allocate resources, so they can optimize return on investment and ensure program affordability. We continue to believe that full implementation of this recommendation would help CBP reach these goals. Border Patrol should incorporate its analysis of the costs of future barrier segments into its process for prioritizing locations for construction of barriers to close this recommendation as fully implemented.

Director: Rebecca S. Gambler, Homeland Security and Justice

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

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

Action Needed: DHS concurred with our recommendation. In November 2020, DHS officials told us that, in coordination with HHS and other agencies, they are developing a Unified Immigration Portal to enable a more complete understanding of an individual's journey throughout the immigration system. DHS officials told us in February 2021 that the portal is to provide real-time data to track unaccompanied children from the time of apprehension to their referral and placement in HHS-funded shelters. In addition, the portal is to automatically share their biographic information across relevant U.S. agencies to help eliminate duplicate data entry and streamline the referral and placement process. Further, HHS officials told us that HHS is developing a new data system to automate the referral process for unaccompanied children, which will be integrated with the portal. By connecting this data system to DHS's portal, HHS foresees that it will be able to retrieve data regarding a child's status in a more automated manner. Further, in March 2021, DHS components and HHS signed a memorandum of agreement regarding unaccompanied children information sharing that outlined the use of HHS's new data system, among other things. As of May 2021, interagency discussions regarding development of these systems were ongoing, and DHS and HHS reported that they would provide an update on the status of their efforts by September 2021. According to DHS officials, DHS and HHS agreed to meet bimonthly to develop a corrective action plan that will address the recommendation. To fully address the recommendation, DHS and HHS should ensure that they have implemented procedures aimed at improving the efficiency and accuracy of the interagency unaccompanied children referral and placement process.

Director: Rebecca S. Gambler, Homeland Security and Justice

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Southwest Border: Actions Needed to Improve DHS Processing of Families and Coordination between DHS and HHS. [GAO-20-245](#). Washington, D.C.: February 19, 2020.

Recommendation: The Secretary of Homeland Security, jointly with the Secretary of Health and Human Services, should collaborate to address information sharing gaps identified in this report to ensure that the Office of Refugee Resettlement (ORR) receives information needed to make decisions for UAC, including those apprehended with an adult.

Action Needed: DHS concurred with this recommendation. As previously mentioned, DHS, in coordination with HHS, is developing a Unified Immigration Portal to provide real-time data to track unaccompanied children from the time of apprehension to their referral and placement in HHS-funded shelters, including those apprehended with an adult. Additionally, HHS's new data system aims to automate the process for referring unaccompanied children from DHS to HHS. DHS and HHS reported that they would provide an update on the status of their efforts by September 2021. According to DHS officials, the agencies plan to meet bimonthly to further coordinate their efforts to address the recommendation. To fully address the recommendation, DHS and HHS should collaborate to address information sharing gaps identified in our report to ensure that ORR receives information needed to make decisions for unaccompanied children, including those apprehended with an adult.

Director: Rebecca S. Gambler, Homeland Security and Justice
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Southwest Border: Actions Needed to Address Fragmentation in DHS's Processes for Apprehended Family Members. [GAO-20-274](#). Washington, D.C.: February 19, 2020.

Recommendation: The Secretary of Homeland Security should identify the information about family members apprehended together that its components collectively need to process those family members and communicate that information to its components.

Action Needed: DHS concurred with this recommendation. According to DHS, in June 2020, DHS's Office of Immigration Statistics launched a Family Status Data Standards Community of Interest (COI). In August 2020, DHS reported that the COI includes subject matter experts and data system managers from DHS components, HHS, and the Department of Justice's Executive Office for Immigration Review. The COI's mandate includes drafting common DHS-wide and interagency data standards (common codes, common definitions, and common formats) for all topics related to family status, including codes to identify the reasons for family separation, members apprehended together, and unaccompanied children. As of March 2021, these actions are underway. DHS expects to complete these actions by September 30, 2021. Identifying and communicating department-wide information needs with respect to family members who have been apprehended together should help provide DHS with greater assurance that its components are identifying all individuals who may be eligible for relief from removal from the U.S. based on their family relationships.

Recommendation: The Secretary of Homeland Security should evaluate options for developing a unique identifier shared across DHS components' data systems to link family members apprehended together.

Action Needed: DHS concurred with this recommendation. In commenting on our draft report, DHS reported that its Office of Immigration Statistics plans to work with relevant components to develop a unique shared identifier linking family members apprehended together. As noted above, DHS launched the Family Status COI in June 2020. The COI's initial focus is on standard codes describing the reasons for family separations. Upon completing the family separation reason standard, DHS reported that the COI will prioritize developing common codes to identify family members apprehended together. As of March 2021, these actions are underway and DHS expects to complete them by September 30, 2021. Evaluating options for developing a shared unique family member identifier across components that would allow each component access to certain information about family members apprehended together would help bridge the information gaps about family relationships between components caused by DHS's fragmented data systems.

Director: Rebecca S. Gambler, Homeland Security and Justice
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Southwest Border: CBP Needs to Increase Oversight of Funds, Medical Care, and Reporting of Deaths. [GAO-20-536](#). Washington, D.C.: July 14, 2020.

Recommendation: The Commissioner of CBP should develop and implement oversight mechanisms for CBP's implementation of policies and procedures relating to medical care for individuals in its custody to include documentation of expected practices, metrics and corresponding performance targets, and roles and responsibilities for taking corrective action.

Action Needed: CBP agreed with this recommendation. As of March 2021, officials stated that CBP is taking a variety of steps to develop oversight mechanisms for its medical care efforts, including incorporating medical quality management requirements into its medical support contract, establishing a Contracting Officer's Representative position for medical services, and developing a protocol for conducting management inspections of medical care at CBP facilities. CBP expects to complete these efforts in September 2021. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's oversight mechanisms, once implemented, to determine whether CBP has fully implemented our recommendation.

Director: Rebecca S. Gambler, Homeland Security and Justice
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Customs and Border Protection: Risk Management for Tariff Refunds Should Be Improved.
[GAO-20-182](#). Washington, D.C.: December 17, 2019.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade assesses the feasibility of flagging excessive export submissions across multiple claims and takes cost-effective steps, based on the assessment, to prevent over claiming.

Action Needed: CBP concurred with this recommendation. According to officials, CBP drafted a proposal for flagging excessive export submissions and is vetting the proposal with trade representatives as of April 2021. CBP expects to complete the proposal by September 2021. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's proposal once finalized, to determine whether CBP has implemented our recommendation.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade develops a plan, with time frames, to establish a reliable system of record for proof of export.

Action Needed: CBP concurred with this recommendation. According to CBP officials, the Automated Export System is insufficient as the sole system of record for electronic proof of export for drawback claims. As of April 2021, CBP is working to develop a plan for establishing a reliable system of record for proof of export. CBP expects to complete the plan by December 2021. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's plan once finalized, to determine whether CBP has implemented our recommendation.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade turns the claim selection feature in ACE back on and finalizes and implements procedures to target claims for review that were accepted into ACE during the period in which the selection feature was disabled.

Action Needed: CBP concurred with this recommendation. According to CBP officials, as of April 2021, the Office of Trade, in collaboration with the Office of Information Technology, is planning to automate updates that enable ACE's claim selection feature. In addition, the Office of Trade plans to retroactively identify drawback claims for review that were accepted into ACE when the selection feature was disabled. CBP expects to complete these steps by January 2022. We will continue to monitor the status of any efforts to enable the claim selection feature in ACE and implement procedures to target claims for review that were accepted into ACE during the period in which the selection feature was disabled.

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Southwest Border Security: Actions Are Needed to Address the Cost and Readiness Implications of Continued DOD Support to U.S. Customs and Border Protection. [GAO-21-356](#). Washington, D.C.: February 23, 2021.

Recommendation: The Secretary of Homeland Security, together with the Secretary of Defense, should define a common outcome for DOD's support to DHS, consistent with best practices for interagency collaboration, and articulate how that support will enable DHS to achieve its southwest border security mission in fiscal year 2021 and beyond.

Action Needed: DHS concurred with this recommendation and stated that it will continue to use the request for assistance process to define and articulate a common outcome for DOD's support to DHS. However, as we stated in our report, this process has not enabled DOD and DHS to agree to a common outcome for DOD's support, because it focuses on meeting DHS's operational requirements over a short period of time. Additionally, DOD and DHS established an interagency planning team with the stated intention of enhancing DOD and DHS coordination and to guide long-term operational planning; however, DHS disbanded this team in October 2019.

DOD and DHS's disagreement on the outcome for support in fiscal year 2021 and beyond is not consistent with the operational reality that DOD has actively supported DHS at the southern border in varying capacities since DHS's inception nearly two decades ago. Because this report was recently published, DHS has had limited time to define a common outcome for DOD support at the southwest border. DHS officials with whom we spoke with in April 2021 indicated that they were working to address this recommendation. Those officials also indicated that they planned to request support from DOD at the southwest border in fiscal year 2022. We will continue to monitor DHS's progress to address this recommendation moving forward.

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Transportation Security

Critical Infrastructure Protection: Actions Needed to Address Significant Weaknesses on TSA's Pipeline Security Program Management. [GAO-19-48](#). Washington, D.C.: December 18, 2018.

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to identify or develop other data sources relevant to threat, vulnerability, and consequence consistent with the National Infrastructure Protection Plan and DHS critical infrastructure risk mitigation priorities and incorporate that data into the Pipeline Relative Risk Ranking Tool to assess relative risk of critical pipeline systems, which could include data on prior attacks, natural hazards, feedback data on pipeline system performance, physical pipeline condition, and cross-sector interdependencies.

Action Needed: DHS agreed with this recommendation. TSA officials reported meeting with representatives from DHS and the Federal Emergency Management Agency in February and

March 2019 for their input on the identification of sources relevant to threat, vulnerability, and consequence specific to pipelines. TSA officials also reported meeting with RAND personnel in March 2020 to discuss possible contract options for addressing this recommendation. However, as of March 2021, TSA officials reported that they did not have a plan to address the recommendation further, as funding was not available for contractor hiring. We will continue to monitor the status of TSA's activities to address this recommendation, as better data sources on threat, vulnerability, and consequence elements in its risk assessment would increase assurance that TSA accurately and comprehensively ranks relative risk among pipeline systems.

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to take steps to coordinate an independent, external peer review of its Pipeline Relative Risk Ranking Tool, after the Pipeline Security Branch completes enhancements to its risk assessment approach.

Action Needed: DHS agreed with this recommendation. As of March 2021, TSA officials reported that conducting an independent, external peer review of its Pipeline Relative Risk Ranking Tool is contingent upon completion of our recommended enhancements to the Tool. As noted in our recommendation, we agree that first implementing enhancements to TSA's risk assessment approach is necessary before launching a peer review. We will continue to monitor TSA's efforts to address this recommendation, as peer reviews can improve the technical quality and the credibility of the underlying decision-making process.

High Risk Area: Ensuring the Cybersecurity of the Nation

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Infrastructure and Management

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

Recommendations: The Secretary of Homeland Security and the Administrator of the General Services Administration (GSA) should work jointly to take the following two actions:

- conduct the following assessments and use the results to inform updated DHS headquarters consolidation plans:
 - a comprehensive needs assessment and gap analysis of current and needed capabilities that take into consideration changing conditions, and
 - an alternatives analysis that identifies the costs and benefits of leasing and construction alternatives for the remainder of the project and prioritizes options to account for funding instability;
- after revising the DHS headquarters consolidation plans, develop revised cost and schedule estimates for the remaining portions of the consolidation project that conform to GSA

guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.

Action Needed: DHS and GSA agreed with the two recommendations. To fully implement the recommendations, DHS and GSA should complete a comprehensive needs assessment, a costs and benefits analysis, and update cost and schedule estimates taking into consideration new administration priorities and budget circumstances. After validating the revised consolidation plan, DHS and GSA should submit their findings to Congress in accordance with the Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 (DHS Consolidation Accountability Act).¹⁵ In October 2020, DHS—with input from GSA—provided a draft of its DHS Consolidation Accountability Act report to the Office of Management and Budget for review. As of April 2021, DHS and GSA are working to address comments on the report from the Office of Management and Budget prior to submitting the report to Congress.

High Risk Area: Managing Federal Real Property

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Director (Acting): Catina Bradley Latham, Physical Infrastructure
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Coast Guard: Actions Needed to Close Stations Identified as Overlapping and Unnecessarily Duplicative. [GAO-18-9](#). Washington, D.C.: October 26, 2017.

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

Action Needed: DHS agreed with this recommendation and stated that it continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. DHS, through the Coast Guard, stated that it would complete additional analyses of its stations in early 2018, with changes to operations expected to begin in the fall of 2018. As of April 2021, the Coast Guard has consolidated four of 18 stations it previously identified as redundant. This consolidation involved closing smaller facilities and moving personnel and assets to nearby larger stations that the Coast Guard determined could provide for the same level of response coverage. The Coast Guard anticipates that divestiture of the closed facilities will take years. However, the Coast Guard removed one station from consideration for consolidation, reporting that public and Congressional members objected to its closure, even though it had identified the station as unnecessarily duplicative. The Coast Guard plans to continue to evaluate the potential for closing additional unnecessarily duplicative stations as part of an iterative boat optimization process, but has not documented a plan with target dates and milestones for closing such stations.

According to the Coast Guard, stations identified as redundant may be included in future budget submissions for closure. For example, the Coast Guard's fiscal year 2022 congressional budget justification proposed consolidation of redundant stations that it believes will achieve about \$1 million in cost savings for the year through such efficiencies. To fully implement these recommendations, the Coast Guard should establish a plan with target dates for closing boat

¹⁵Pub. L. No. 114-150, 130 Stat. 366 (2016).

stations that it determined provide overlapping search and rescue coverage and are unnecessarily duplicative.

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

Action Needed: DHS agreed with this recommendation and stated that once analyses and plans and target dates were complete, it would solicit and incorporate feedback and begin implementing changes in the fall of 2018. As of April 2021, the Coast Guard reported that it had consolidated four stations with larger adjacent stations. However, the Coast Guard continues to evaluate redundant stations for closure as part of its boat optimization process, and stations identified as redundant may be recommended for closure in future budget submissions. DHS, through the Coast Guard, should close boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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Coast Guard Shore Infrastructure: Applying Leading Practices Could Help Better Manage Project Backlogs of at Least \$2.6 Billion. [GAO-19-82](#). Washington, D.C.: February 21, 2019.

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

Action Needed: The Coast Guard agreed with our recommendation, but, as of April 2021, had not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternatives to identify a preferred solution to recommend for implementation, and estimated that it will complete this analysis and fully implement a modeling solution by the end of September 2023.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs. [GAO-20-223](#). Washington, D.C.: February 26, 2020.

Recommendation: The Commandant of the Coast Guard should update its April 2018 Manpower Requirements Plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units.

Action Needed: DHS concurred with this recommendation. In February 2020, we reported that the Coast Guard had assessed a small portion of its workforce needs and recommended it update its April 2018 Manpower Requirements Plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units. DHS stated that the Coast Guard's Assistant Commandant for Human Resources Directorate would update its Manpower Requirements Plan during the next periodic report submitted to Congress, due in fiscal year 2022. In February 2021, the Coast Guard estimated completing the effort by March 31, 2022.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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Coast Guard: Actions Needed to Improve National Vessel Documentation Center Operations. [GAO-21-100](#). Washington, D.C.: December 16, 2020.

Recommendation: The Commandant of the Coast Guard should direct the Assistant Commandant for Prevention Policy to ensure that the National Vessel Documentation Center (NVDC) conducts a full cost study of NVDC's commercial and recreational user fees.

Action Needed: In concurring with our recommendation, the Coast Guard stated that the NVDC will conduct a full cost study of its commercial and recreational user fees, with oversight provided as needed by the Director of Operations Resource Management for the Deputy Commandant for Operations. DHS stated that the NVDC would do so after the Coast Guard develops a new information technology system to allow the NVDC to accurately assess the actual costs of providing services to the public, including new information technology support costs. DHS estimated that it would obtain delivery of the new information technology system by March 31, 2022, and conduct the fully cost study by December 31, 2022.

Director (Acting): Heather MacLeod, Homeland Security and Justice
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DHS Employee Morale: Some Improvements Made, but Additional Actions Needed to Strengthen Employee Engagement. [GAO-21-204](#). Washington, D.C.: January 12, 2021.

Recommendation: DHS OCHCO should monitor components' implementation of the OPM action planning cycle to ensure the components review and assess the results of their actions to adjust, reprioritize, and identify new actions needed to improve employee engagement.

Action Needed: DHS agreed with the recommendation. In March 2021, OCHCO issued written guidance for the DHS component employee engagement action planning process that includes mechanisms for OCHCO to monitor components implementation of the OPM action planning cycle. Specifically, this guidance establishes a series of checkpoints for components to engage with OCHCO as part of the action planning cycle. The guidance also lists questions that OCHCO will ask in reviewing component employee engagement action planning efforts that discuss the component's process for implementing and evaluating these efforts.

In April 2021, officials stated that as part of these meetings with components, OCHCO will document component responses and feedback OCHCO provides to the components on their employee engagement action planning efforts. OCHCO officials stated that they plan to use this process to ensure components track and document the results of their employee engagement action planning efforts. To fully implement this recommendation, OCHCO will need to demonstrate that their new monitoring framework ensures that components consistently review and assess the results of their employee engagement action planning efforts and use these assessments to adjust, reprioritize, and identify new actions to improve employee engagement.

High Risk Area: Strengthening Department of Homeland Security Management Functions

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Information Technology and Cybersecurity

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

Recommendation: To more fully address the requirements identified in the National Cybersecurity Protection Act of 2014 and the Cybersecurity Act of 2015, we recommended that the Secretary of Homeland Security should establish methods for monitoring the implementation of cybersecurity functions against the principles on an ongoing basis.

Action Needed: DHS agreed with the recommendation and has taken steps to address it. Specifically, DHS has demonstrated that it has developed metrics for assessing adherence to all applicable principles in carrying out statutorily required functions, which is intended to enable the National Cybersecurity and Communications Integration Center (NCCIC) to assess its effectiveness performing cybersecurity functions in adherence of applicable principles. In March 2021, DHS stated the mechanisms by which the identified metrics are tracked, but provided no evidence of the specific metric information tracked, indication that the information was presented, and whether or not this occurred on an on-going basis. Once DHS provides specific evidence of data tracked in support of the aforementioned compliance measures, we will review to determine if it has closed this recommendation.

High Risk Area: Ensuring the Cybersecurity of the Nation

Director: Nick Marinos, Information Technology and Cybersecurity

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

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

Action Needed: DHS concurred with the recommendation in our report and stated that the department will continue to work closely with its private sector partners to ensure framework adoption is a priority. Additionally, the agency stated that it would try to better understand the extent of and barriers to framework adoption by entities across their respective sectors. The department began taking steps to develop methods to determine the level and type of framework adoption in one of its respective sectors. Specifically, from October through December 2019, DHS officials, in coordination with its IT sector partner, administered a survey to approximately 100 small and mid-sized businesses (with 50 percent representing IT sector organizations) to gather information on, among other things, their level of framework adoption and use in conjunction with other cybersecurity standards. However, the survey does not measure the level and type of framework adoption by entities across DHS's other critical infrastructure sectors.

While the department has taken important initial steps for measuring framework adoption and use for a portion of the IT sector and has developed sector-specific framework implementation guidance for other sectors, implementing our recommendations to gain a more comprehensive understanding of the framework's use by all of its critical infrastructure sectors is essential to the success of protection efforts.

High Risk Area: Ensuring the Cybersecurity of the Nation

Director: Vijay D'Souza, Information Technology and Cybersecurity

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

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

Action Needed: DHS concurred with our recommendation. In January 2020, the department stated that it planned to clarify the cybersecurity risk executive's role, and that these changes would be coordinated with other DHS offices responsible for enterprise risk management, as appropriate. DHS estimated that it would finalize these actions by July 31, 2020. However, as of April 2021, DHS had not provided details on how coordination occurs between entities responsible for cybersecurity and those responsible for enterprise risk management. To fully implement this recommendation, DHS needs to establish and document its process for coordination between these two functions.

High Risk Area: Ensuring the Cybersecurity of the Nation

Director: Jennifer R. Franks, Information Technology and Cybersecurity

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Information Technology: DHS Directives Have Strengthened Federal Cybersecurity, but Improvements Are Needed. [GAO-20-133](#). Washington, D.C.: February 4, 2020.

Recommendation: The Secretary of Homeland Security should develop a schedule and plan for completing the high value asset program reassessment and addressing the outstanding issues on completing the required high value asset assessments, identifying needed resources, and finalizing guidance for Tier 2 and 3 HVA systems.

Action Needed: DHS concurred with this recommendation. In December 2020, DHS stated that although CISA was not on track to complete the required Tier 1 HVA assessments in fiscal year 2021, it was working on addressing the assessment constraints. Specifically, it noted that CISA had increased staffing levels, which will support at a minimum 80 HVA assessments annually and was working on developing process improvements to streamline the HVA assessment process. It added that these improvements and staffing increases would allow CISA to meet the requirement of assessing 100% of the HVA Tier 1 inventory over the 3-year period going forward. However, it has yet to provide a schedule and plan for completing these assessments and improvements.

Further, in March 2021, DHS stated that it had developed standardized training for HVA assessors. DHS stated that its training capability would be fully operational in May 2021. However, DHS will only be able to train 150 people in this fiscal year due to budget constraints. Training dates for the next two fiscal years, which are needed to have enough people to conduct the required assessments, are still pending. Further, DHS stated that it has drafted supplemental guidance for Tier 2 and 3 high value assets (now called non-Tier-1 assets) and expected that it would be published in March 2021. However, the guidance has not yet been completed. To fully implement this recommendation, DHS will need to develop a schedule and plan, schedule the required training, and complete its supplemental guidance.

High Risk Area: Ensuring the Cybersecurity of the Nation

Director: Vijay D'Souza, Information Technology and Cybersecurity
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Agile Software Development: DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to take Additional Actions. [GAO-20-213](#). Washington, D.C.: June 1, 2020.

Recommendation: The Secretary should ensure that the IT Program Management Center of Excellence (ITPM COE), in coordination with the CIO, begins measuring results associated with the transition to Agile and the success of the transition based on its impact on the department.

Action Needed: DHS concurred with our recommendation. In July 2021, DHS's Acting Chief Technology Officer approved an updated Agile Software Delivery Core Metrics Guidebook. The guidebook explains that programs must report monthly on six Agile core metrics (e.g., availability, cycle time, and unit test coverage) in DHS's Investment Evaluation Submission and Tracking system. In addition, in August 2021, DHS noted that these metrics are included as part of its Program Health Assessments for major and standard IT programs across the department. DHS also stated that the Office of the Chief Information Officer has informed programs that non-compliance will result in an adverse Program Health Assessment score. According to DHS, these measurements will ensure that the DHS Agile transition is successful. Nevertheless, DHS did not provide evidence to demonstrate that the updated metrics are being collected and used to measure results associated with its transition to Agile and the success of the transition based on its impact on the department. To fully implement this recommendation, DHS needs to demonstrate that it is measuring the results associated with its transition to Agile and the success of the transition.

High Risk Area: Improving the Management of IT Acquisitions and Operations

Director: Carol Harris, Information Technology and Cybersecurity
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Chemical and Nuclear Security

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

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

Action Needed: DHS agreed with this recommendation. CWMD officials provided us with the completed strategy in December 2019 and plan to complete the implementation plan by September 1, 2021. We will continue to monitor the status of the implementation plan, as completion of both documents is essential to help the CWMD Office guide DHS's efforts to address fragmentation and coordination issues and would be consistent with the office's aim to establish a coherent mission.

Director: Christopher P. Currie, Homeland Security and Justice

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Critical Infrastructure Protection: Actions Needed to Enhance DHS Oversight of Cybersecurity at High-Risk Chemical Facilities. [GAO-20-453](#). Washington, D.C.: May 14, 2020.

Recommendation: The Assistant Director of the Infrastructure Security Division should develop a workforce plan that addresses the program's cybersecurity-related needs, which should include an analysis of any gaps in the program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them.

Action Needed: DHS concurred with this recommendation and took several steps to address it. According to CISA officials, as of April 2021 they prepared two draft workforce planning documents that are undergoing internal management review. The first, according to the officials, is the CISA Chemical Security Workforce Planning Guide, which outlines a process for workforce planning within CISA's Chemical Security division. The second, according to the officials, is the CISA Chemical Security Concept of Operations for Cybersecurity Workforce Planning, which documents the approach CISA Chemical Security will use to employ the Workforce Planning Guide to conduct a workforce planning review of cybersecurity capacities and capabilities of chemical security staff, including chemical security inspectors.

Completion of the workforce planning documents, and provision of them to us for review, will assist us in determining whether closure of the recommendation as implemented may be warranted. Fully addressing this recommendation by conducting an analysis of any gaps in the program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them will help the Chemical Facility Anti-Terrorism Standards program ensure that it has the appropriate number of staff to carry out the program's cybersecurity-related efforts.

High Risk Area: Ensuring the Cybersecurity of the Nation

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