



January 2024

HOMELAND SECURITY GRANTS

DHS Implemented National Priority Areas but Could Better Document and Communicate Changes

GAO Highlights

Highlights of [GAO-24-106327](#), a report to the Ranking Member, Committee on Homeland Security, House of Representatives.

Why GAO Did This Study

Since fiscal year 2002, FEMA has awarded over \$55 billion in threat preparedness grants to state, local, tribal, and territorial governments. One of these grants is the Homeland Security Grant Program. In fiscal year 2020, DHS introduced National Priority Areas to this grant to target funding toward evolving threats. FEMA's process for changing the National Priority Areas consists of soliciting and analyzing information from various sources. FEMA provides potential recommendations to the Secretary of Homeland Security who makes the changes.

GAO was asked to examine how DHS established and makes changes to National Priority Areas. This report examines the extent to which: (1) DHS documented its process for changing the National Priority Areas and communicated changes to stakeholders; and (2) FEMA monitored grantee projects' alignment with the Priority Areas. GAO evaluated agency guidance and fiscal year 2020 through 2022 program data—the most current available—and interviewed FEMA officials. GAO interviewed state and local emergency management officials from 16 grantee jurisdictions selected to reflect a range of funding level and geography.

What GAO Recommends

GAO is recommending that (1) DHS fully document the rationale and process for making changes to the National Priority Areas; and (2) FEMA conduct targeted outreach to stakeholders. DHS and FEMA concurred with our recommendations.

View [GAO-24-106327](#). For more information, contact Chris Currie at (404) 679-1875 or curriec@gao.gov.

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DHS Implemented National Priority Areas but Could Better Document and Communicate Changes

What GAO Found

The Department of Homeland Security's (DHS) Federal Emergency Management Agency (FEMA) established a process for making changes to its Homeland Security Grant Program National Priority Areas. However, it has not fully documented the rationale and process used for making the changes. Doing so could help DHS improve transparency for how or why these decisions are made and ensure continuity of institutional knowledge about the program.

FEMA has hosted webinars and technical assistance calls to provide grantees information on grant applications. But FEMA has not conducted additional targeted outreach, such as the listening sessions it conducted in fiscal year 2021 to solicit suggestions to improve its communication with stakeholders. Doing so would help FEMA better understand and address communication and other challenges stakeholders reported facing with implementing National Priority Area changes. This could also help FEMA better assist grantees with their planning efforts and help allow for the better prioritization of program funds moving forward.

Homeland Security Grant Program Funded Bomb Squad Vehicle



Source: GAO observation of Homeland Security Grant Program funded bomb squad vehicle at the 2023 National Homeland Security Conference. | [GAO-24-106327](#)

FEMA uses a variety of methods to monitor grantees' projects to ensure they align with National Priority areas. GAO found that grant projects from fiscal year 2020 through 2022 generally aligned with these areas. GAO also found that grantee projects changed over time to reflect associated changes to the National Priority Areas. For example, DHS added domestic violent extremism as a National Priority Area in fiscal year 2021. GAO's analysis of FEMA data found that grantees met required spending thresholds for this area and implemented associated projects.

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Abbreviations

CISA	Cybersecurity and Infrastructure Security Agency
DHS	Department of Homeland Security
I&A	Office of Intelligence and Analysis
FEMA	Federal Emergency Management Agency
SHSP	State Homeland Security Program
UASI	Urban Areas Security Initiative

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January 9, 2024

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

Dear Mr. Thompson:

Since 2002, the Department of Homeland Security (DHS), through the Federal Emergency Management Agency (FEMA), has awarded over \$55 billion in preparedness grants. These grants assist state, local, tribal, and territorial efforts to prevent, protect against, mitigate, respond to, and recover from, various natural and manmade threats. Of these grants—the Homeland Security Grant Program (the Program)—provides the resources required for implementing the National Preparedness System by assisting state, local, tribal, and territorial governments' efforts in preventing, protecting against, mitigating, responding to, and recovering from acts of terrorism.¹ FEMA awarded approximately \$1.12 billion in Homeland Security Grant Funding in fiscal year 2023.

DHS bases the Program allocations to states and urban areas, in part, on FEMA's risk-based grant assessment model. Specifically, this risk model is used to determine the relative risk order of (a) 50 states and six territories, and (b) the nation's 100 most populous urban areas. The risk model is used to designate high-risk urban areas that are eligible for

¹The White House released Presidential Policy Directive 8 on National Preparedness in March 2011. It directed the Secretary of Homeland Security to design a national preparedness system to address the threats posing the greatest risk to the security of the nation and issue various policy and planning documents designed to strengthen national preparedness. It required the Secretary to develop a National Preparedness Goal that identifies the core capabilities necessary to achieve preparedness. FEMA uses the National Preparedness System to help assess the nation's emergency management capabilities in preparing for disasters and, in part, to help prioritize federal preparedness grants it provides to state and local jurisdictions.

funding. According to FEMA officials, this serves to inform DHS leadership in their final determinations of grant award amounts.²

DHS established the National Priority Areas for the Program in 2020 to help ensure it targets grant funding toward evolving threats. In 2020, DHS established four new National Priority Areas for the Program: (1) cybersecurity, (2) protection of soft targets, (3) information sharing; and (4) emergent threats. DHS required grantees to allocate 20 percent of the grant funding they received across these four areas, with minimum spending percentages for each area. DHS has changed the number of priority areas and corresponding spend requirements for each since the initial establishment of the priorities in 2020. As of fiscal year 2023, there are six national Priority Areas.

Since 2008, we and others have assessed FEMA's risk assessment model and made recommendations to strengthen it. In 2018, we examined factors affecting grant distributions as well as the steps that FEMA has taken to strengthen the risk assessment model.³ We found that FEMA had strengthened the model but had not incorporated additional scientific practices. We recommended that FEMA fully document the model's assumptions and justifications, perform additional in-depth analyses, and coordinate an external peer review. DHS agreed with our recommendations and implemented them.

Further, in 2020 we examined how FEMA's National Preparedness System and associated preparedness grants, including the Program, assisted jurisdictions in preparing for disasters.⁴ We found that these grants had helped build emergency management capabilities, but gaps remained. We recommended that FEMA determine the steps needed to address the capability gaps and communicate them to key stakeholders.

²Pertaining to urban areas, the risk assessment is initially conducted for the 100 most populous metropolitan statistical areas. Based on that assessment, FEMA designates entities as "high-risk urban areas" and those are then eligible to apply for and receive Urban Areas Security Initiative (UASI) funding. See 6 U.S.C. §§ 601(5), (8), 604(b). All 50 states and 6 territories are eligible to apply for and receive State Homeland Security Program (SHSP) funding. UASI and SHSP are components of the Homeland Security Grant Program.

³GAO *Homeland Security Grant Program: Additional Factors Could Further Enhance FEMA's Risk-Based Grant Assessment Model* [GAO-18-354](#) (Washington, D.C.: Sep 6, 2018).

⁴GAO *National Preparedness: Additional Actions Needed to Address Gaps in the Nation's Emergency Management Capabilities* [GAO-20-297](#) (Washington, D.C.: May 4, 2020).

As of October 2023, FEMA had taken actions to implement this recommendation such as developing a national federal-level capability gap analysis, but has not fully determined the resources needed to meet the gaps.

You requested that we examine how FEMA determines and implements the Program National Priority Areas and spending allocations, conducts outreach to external stakeholders, and monitors and evaluates these areas. This report examines:

1. the extent to which DHS has documented its process for changing the National Priority Areas, and communicated these changes to stakeholders; and
2. the extent to which FEMA monitors grantee projects' alignment with the National Priority Areas.

To address both of our objectives, we interviewed officials from FEMA's Grant Programs Directorate who are responsible for administering and managing the Program. We also interviewed officials from the DHS offices involved in the grant process, such as the Office of Intelligence and Analysis (I&A), and the Cybersecurity and Infrastructure Security Agency (CISA). Further, we reviewed key documents, such as the Notices of Funding Opportunity for fiscal years 2020 through 2023, as well as technical assistance guidance FEMA provided to grantees. We also interviewed officials from 16 grantee jurisdictions, representing states and Urban Areas Security Initiatives (UASIs).⁵ We selected the 16 grantees to represent a range of grantee type (i.e., state and urban area), geographic location—representing all 10 FEMA regions—and Program funding levels. Our interviews comprised of both individual and group discussions. The findings from the interviews are not generalizable but provide valuable insights on DHS and FEMA's establishment and implementation of the Homeland Security Grant Program National Priority Areas.

Additionally, we obtained perspectives from FEMA and Program grantees by attending the 2023 National Homeland Security Conference. We also

⁵The four grantee states we selected for our interviews were: New Jersey, Texas, Mississippi, and Pennsylvania. The UASIs we selected were: (1) Chicago, (2) Baltimore, (3) Sacramento, (4) Denver, (5) Tampa, (6) Boston, (7) St. Louis, (8) New York City, (9) Washington D.C. (10) Seattle, and (11) Houston. We interviewed officials from two jurisdictions that represent the Houston area UASI—Harris County and City of Houston—for a total of 16 grantee jurisdictions.

observed mock terrorism-related emergency response exercises and equipment purchased using Program funds.

To determine the extent to which FEMA has implemented a process for developing and changing the National Priority Areas and communicated changes to stakeholders, we assessed FEMA's actions during the establishment of the National Priority Areas in fiscal year 2020 through document reviews, agency interviews, and discussions with Program grantees. As part of this effort, we evaluated FEMA's implementation of subsequent changes to National Priority Areas in fiscal years 2021 through 2023 against Standards for Internal Control in the Federal Government⁶ as well as leading principles for organizational change management that were identified in previous GAO reports.⁷ We selected two out of eight leading practices for organizational change management, developed for prior GAO work, based on their applicability to our engagement, including: (1) effectively communicating with stakeholders, and (2) identifying and addressing stakeholder's potential barriers to change.⁸

To determine how FEMA monitors whether projects align with the National Priority Areas, we analyzed FEMA's process and measures for evaluating and monitoring proposed and approved projects. These measures and processes include those that the FEMA Preparedness Grants Manual and the Program Notice of Funding Opportunity for fiscal

⁶ GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014)

⁷ Project Management Institute, Inc., *Managing Change in Organizations: A Practice Guide*, (Newtown Square, PA.: 2013); Office of Personnel Management (OPM), *Migration Planning Guidance Information Documents, Change Management Best Practices* (Oct. 7, 2011); GAO, *Business Process Reengineering Assessment Guide*, version 3, [GAO/AIMD-10.1.15](#) (Washington, D.C.: May 1997); ISACA, *COBIT 2019 Framework* (2019); and Prosci, *The Prosci ADKAR® Model, A Goal Oriented Change Management Model to Guide Individual and Organizational Change*, accessed Feb. 21, 2021, <https://www.prosci.com/methodology/adkar>. ADKAR® is a registered trademark of Prosci, Inc. For the full list of organizational change management leading practices see appendix II. Seven of the organizational change management leading practices were originally cited in [GAO-22-105059](#). Alterations made to the leading practices, including the addition of one leading practice and adjustments to the definitions are cited in *Electronic Health Record Modernization: VA Needs to Address Change Management Challenges, User Satisfaction, and System Issues*, [GAO-23-106685](#) (Washington, D.C.: Mar. 15, 2023). We selected leading practices relevant to assessing agency processes for making National Priority Area changes and stakeholder engagement.

⁸ GAO, *Electronic Health Record Modernization: VA Needs to Address Change Management Challenges, User Satisfaction, and System Issues*, [GAO-23-106685](#) (Washington, D.C.: Mar. 15, 2023)

years 2020 through 2022 showed FEMA used for evaluating grantees' project funding proposals, and for monitoring projects after they are approved and during implementation.

To determine how approved projects changed from fiscal years 2020 through 2022, we obtained and analyzed FEMA's data for approved Program projects for this time. These data included total Program funding to State Homeland Security Program (SHSP) and Urban Areas Security Initiative (UASI) grantees, percentage spending on National Priority Areas projects for each grantee, and data on project type, monitoring, and outcome. To assess the reliability of these data, we compared the Program data with information selected grantees submitted as part of our interviews and interviewed FEMA officials to determine how they compiled and reviewed the accuracy of the data. Based on these steps, we determined the project funding and implementation data to be sufficiently reliable for the purpose of reporting on how approved Program projects changed over the period of our review.

We conducted this performance audit from October 2022 to November 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

DHS's Homeland Security Grant Program

Domestic Violent Extremism Threat Example

On the morning of July 4, 2022, the City of Highland Park, Illinois was gearing up to celebrate Independence Day as a community for the first time in two years. A mass shooting took place at 10:14 AM, 14 minutes after the parade started. The gunman, a lone offender, positioned on top of a roof, fired over 70 shots from an assault style weapon into the crowd below. Seven people were killed, 48 others were wounded by bullets or shrapnel. The City of Highland Park, responded alongside federal, state, county and other local enforcement agencies. The gunman was indicted on 117 felony counts and no trial date has been set. The Homeland Security Grant Program aims to help communities prevent and respond to such incidents.

Source: National Homeland Security Association. | GAO-24-106327

The Program supports one of five homeland security missions noted in the DHS Quadrennial Homeland Security Review—to Strengthen National Preparedness and Resilience.⁹ The Program is comprised of three grant programs. The largest of the three is the UASI and the second largest is the SHSP, by funding amount.¹⁰ See appendix I for Program funding amounts allocated to each state and urban area from fiscal year 2020-2022.

⁹DHS' Quadrennial Homeland Security Review offers recommendations on long-term strategy and priorities for homeland security. According to DHS, the report provides the strategic foundation to ensure that the Department is ready to meet future challenges.

¹⁰See 6 U.S.C. §§ 604-605. The third Homeland Security Grant Program grant is Operation Stone Garden, which provides funding to support joint efforts to secure the nation's borders. Comparatively, Operation Stone Garden receives a relatively small portion of Homeland Security Grant Program funding and is not included in this review. For example, in fiscal year 2022, it received \$90 million compared to \$615M and \$415M for the UASI and SHSP, respectively.

A Terrorism Task Force Mobile Emergency Medical Services Vehicle Funded by the Homeland Security Grant Program.



Source: GAO observation of a Chicago UASI emergency response equipment display at the 2023 National Homeland Security Conference. | GAO-24-106327

- **SHSP grants** provide federal assistance to support states' implementation of homeland security strategies. These funds aim to address planning, organization, equipment, training, and exercise needed at the state or local levels to prevent, prepare for, protect against, and respond to acts of terrorism. SHSP grants are annually awarded to all the nation's 50 states and 6 territories. SHSP grant awards are calculated in two parts. All states and territories are to receive a minimum grant amount required by law, based on a percentage of the total amount of SHSP and UASI appropriations in a given fiscal year.¹¹ The remaining award amounts are based on FEMA's risk-based grant assessment model.¹²
- **UASI grants** provide federal assistance to address the unique needs of high-threat, high-density urban areas, and assists the areas in building an enhanced and sustainable capacity to prevent, prepare for, protect against, and respond to acts of terrorism. For the UASI program, FEMA uses the risk-based grant assessment model each year to identify the urban areas that will be eligible to receive funding.

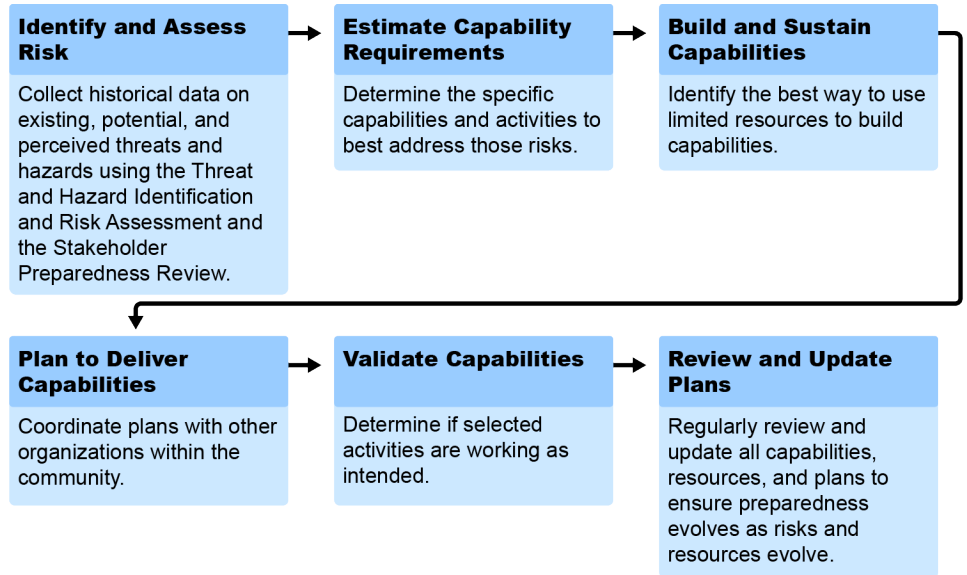
To identify risks that are integral to prioritizing Program allocations, FEMA requires grantees to complete a Threat and Hazard Identification and Risk Assessment and a Stakeholder Preparedness Review.¹³ This is the first step of the National Preparedness System. As shown in figure 1, this is a 6-step process.

¹¹See 6 U.S.C. § 605(e).

¹²FEMA's risk-based model uses threat, vulnerability, and consequence as its core variables. The model applies a risk management process to provide a structured means of making informed trade-offs and choices about how to use finite funding effectively.

¹³The Threat and Hazard Identification and Risk Assessment is conducted by jurisdictions every 3 years to, in part, to identify threats and hazards that are both reasonably likely to affect the community and would most challenge the community's ability to deliver one or more of its capabilities; and estimate and describe the potential impacts of those threats and hazards. Jurisdictions conduct Stakeholder Preparedness Reviews annually to, among other things, identify gaps by assessing capabilities against the types of threats and hazards identified in the Threat and Hazard Identification and Risk Assessment.

Figure 1: The National Preparedness System Process for Identifying Risk, Estimating Capabilities, and Prioritizing Projects for Homeland Security Grant Program Funding



Source: GAO Analysis of FEMA information. | GAO-24-106327

DHS is required to publish a Notice of Funding Opportunity for the Program no later than 60 days after the enactment of DHS’s appropriations, according to DHS officials. The length of the application period for Program funding therefore varies annually based on when appropriations are enacted.¹⁴ The performance period for the Program—from the time a project is approved to project implementation—is 3 years. As such, National Priority Area grant projects approved in fiscal year 2020 were to be fully implemented by August 2023. For example, in fiscal year 2020 DHS awarded \$143,706 to the Dallas-Fort Worth UASI for sustainment of the City of Denton’s specialized regional emergency response teams and FEMA records show this project was complete as of February 2023.

¹⁴ 28 C.F.R. § 200.204(b) provides that a federal awarding agency must generally make all funding opportunities available for at least 60 calendar days.

Agency and Stakeholder Roles and Responsibilities Related to the Homeland Security Grant Program

A number of DHS entities are involved in managing preparedness grants and developing the National Priority Areas.¹⁵ FEMA's Grant Programs Directorate administers and manages the Program, among other FEMA grants, by providing grant guidance, approving grant applications, and monitoring and evaluating approved projects. DHS's Office of the Secretary oversees the department's efforts to counter terrorism and enhance security, safeguard and secure cyberspace, and build resilience to disasters, among other security efforts, in coordination with federal, state, local, international and private sector partners. The Secretary of Homeland Security makes the final decision about what the National Priority Areas are and how much will be allocated to each.

CISA is responsible for providing guidance to support state, local, and industry partners in identifying the critical infrastructure sectors and essential workers needed to maintain the nation's services and functions. I&A is responsible for gathering and disseminating intelligence to federal, state, and local partners to support national and departmental missions to protect the homeland. According to FEMA officials, CISA and I&A, among other entities, provide the information and subject matter expertise FEMA needs to review and approve Program projects. Table 1 shows key internal and external stakeholders for the Program.

¹⁵DHS has broad authority to administer Homeland security grant programs. See 6 U.S.C. § 603(a). As part of administering these grant programs, DHS created National Priority Areas as a way to prioritize certain risk areas. Additionally, through appropriations acts and accompanying explanatory statements, Congress has also provided direction as to what risk areas should be considered or prioritized within these grant programs. See, e.g., H.R. Rep. No. 116-125 (Sept. 26, 2019) (incorporated by reference in explanatory statement accompanying Pub. L. No. 116-93, 133 Stat. 2317 (2019)) (stating that the Administrator shall consider the needs of cybersecurity preparedness and resilience when awarding Homeland security grants).

Table 1: Department of Homeland Security (DHS)'s Internal and External Stakeholders for the Homeland Security Grant Program

Internal Stakeholders	External Stakeholders
<ul style="list-style-type: none"> DHS Office of the Secretary^a DHS Office of Intelligence and Analysis^b DHS Office of Strategy, Policy, and Plans DHS Center for Prevention Programs and Partnerships DHS Countering Weapons of Mass Destruction Office U.S. Customs and Border Protection Cybersecurity and Infrastructure Security Agency Federal Emergency Management Agency Individual and Community Preparedness Division 	<ul style="list-style-type: none"> Intelligence Community^c National Security Council State Homeland Security Program and Urban Areas Security Initiative grantees Office of Management and Budget Stakeholder associations for government entities^d; community and emergency management; and law enforcement^e; Homeland Security Advisory Council Subcommittee

Source: GAO analysis of FEMA information. | GAO-24-106327

^aAs informed by risk, the Secretary of Homeland Security can develop and change the National Priority Area at his or her discretion.

^bFEMA identified several DHS agencies and offices as subject matter experts in the grant proposal review process. They include the DHS Office of Intelligence and Analysis, DHS Center for Prevention Programs and Partnerships, DHS Countering Weapons of Mass Destruction Office, and Cybersecurity and Infrastructure Security Agency.

^cThe intelligence community consists of 18 organizations across the government.

^dCommunity and emergency management stakeholder associations include the National Homeland Security Association; National Governors Association; National Association of Counties; National League of Cities; International Association of Emergency Managers; National Emergency Management Association; National Conference of State Legislatures; U.S. Conference of Mayors; and Big City Emergency Managers.

^eLaw enforcement stakeholder associations include the International Association of Chiefs of Police; National Sheriffs Association; Major Cities Chiefs; National Fusion Center Association; National Organization of Black Law Enforcement Executives; Hispanic American Police Command Officers Association; and National Native American Law Enforcement Association.

DHS Has Not Fully Documented Its Process for Changing National Priority Areas or Communicated with Stakeholders in Advance of Changes

DHS Has A Process for Developing and Changing National Priority Areas

DHS developed the National Priority Areas in fiscal year 2020 and has made subsequent changes in each year since then. For example, in 2021, DHS added a fifth National Priority Area—combating domestic violent extremism—and increased the total required minimum spending percentages of the National Priority Areas from 20 percent to 30 percent. In fiscal year 2022, DHS substituted one of the five priority areas (addressing emergent threats) with two new priority areas (election security and enhancing community preparedness and resilience), increasing the total number of National Priority Areas to six. Table 2 outlines the National Priorities for fiscal year 2020 through 2023.

Table 2: National Priority Areas for Fiscal Years 2020 through 2023

Fiscal Year 2020	Fiscal Year 2021	Fiscal Year 2022	Fiscal Year 2023
(1) Protection of Soft Targets and Crowded Places	(1) Protection of Soft Targets and Crowded Places	(1) Protection of Soft Targets and Crowded Places	(1) Protection of Soft Targets and Crowded Places
(2) Information and Intelligence Sharing and Cooperation ^a	(2) Information and Intelligence Sharing and Cooperation	(2) Information and Intelligence Sharing and Cooperation	(2) Information and Intelligence Sharing and Cooperation
(3) Cybersecurity	(3) Cybersecurity	(3) Cybersecurity	(3) Cybersecurity
(4) Addressing Emergent Threats	(4) Addressing Emergent Threats	(4) Combating Domestic Violent Extremism	(4) Combating Domestic Violent Extremism
	(5) Combating Domestic Violent Extremism	(5) Enhancing Community Preparedness and Resilience	(5) Enhancing Community Preparedness and Resilience
		(6) Election Security	(6) Election Security

Source: GAO analysis of FEMA information. | GAO-24-106327

^aThis National Priority Area is also referred to as (1) “enhancing information and intelligence sharing and cooperation with federal agencies, including DHS” and (2) “enhancing information and intelligence sharing and analysis” in the 2020 and 2023 Homeland Security Grant Program Notices of Funding Opportunity respectively.

FEMA Grant Programs Directorate officials told us that DHS’s process for changing the National Priority Areas consists of soliciting and analyzing information from various sources, such as National Preparedness Reports and subject matter experts like CISA and I&A.¹⁶ In accordance with DHS’s process, information and potential recommendations are then sent to the Secretary who unilaterally makes changes at his or her

¹⁶According to FEMA, National Preparedness Reports summarize the progress made and challenges that remain in building and sustaining the capabilities needed to prevent, protect against, mitigate, respond to, and recover from the threats, hazards and incidents that pose the greatest risk to the Nation.

discretion, which according to FEMA officials is informed by risk.¹⁷ DHS communicates changes to the National Priority Areas, as well as overall guidance for the Program—including funding allocations and program deadlines—in a Notice of Funding Opportunity, which it issues annually. FEMA published the fiscal year 2023 notice in February 2023 and grantees had until May 2023 to submit their applications.

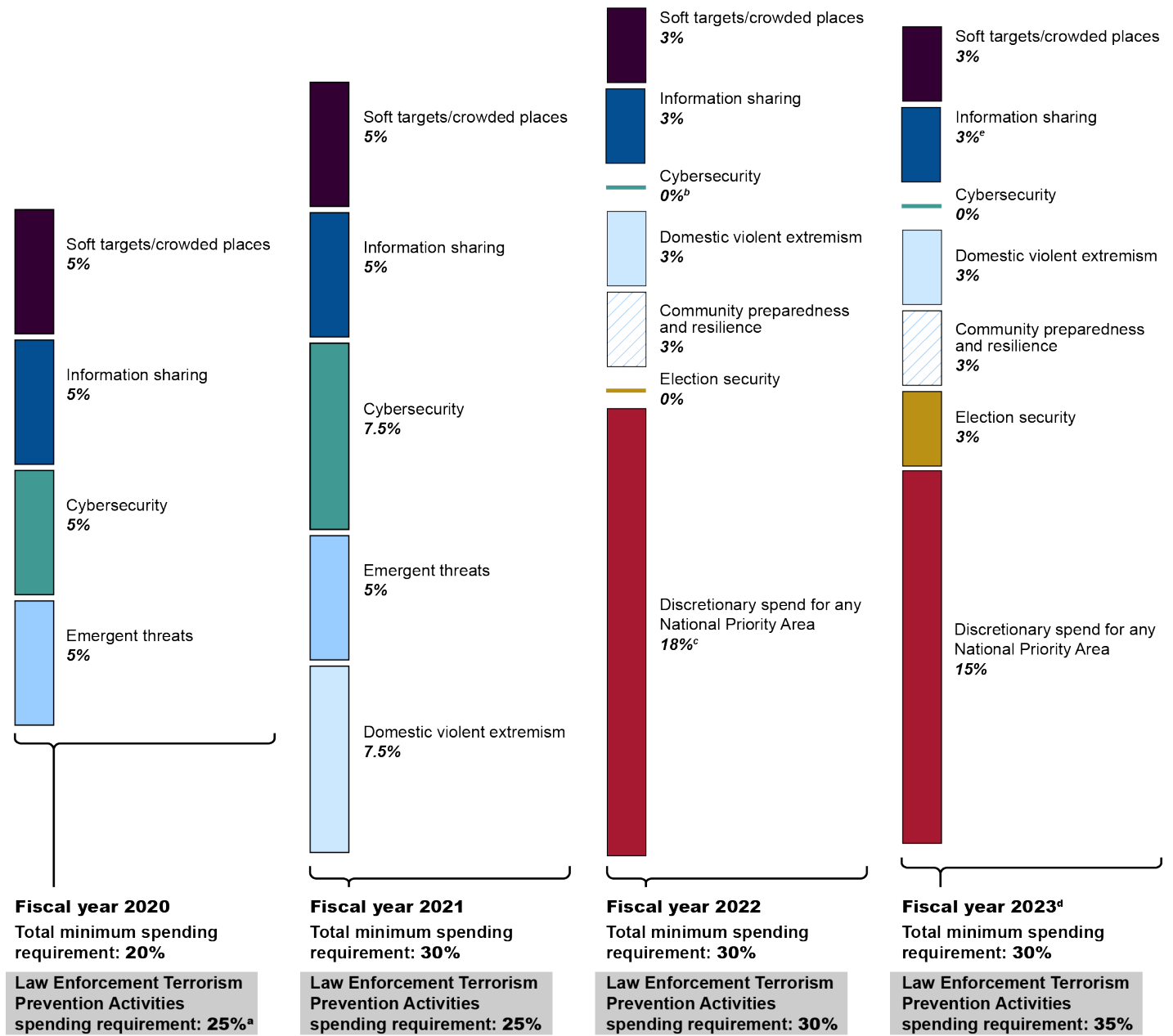
FEMA officials said that prior to DHS implementing changes to the National Priority Areas in fiscal years 2021 through 2023, the Secretary obtained input from agency officials to discuss potential changes. FEMA officials said they recommended the changes based on internal analyses, as well as feedback they received from internal and external stakeholders, such as the National Security Council and CISA.

For example, FEMA officials said they recommended that the Secretary implement a minimum spend requirement for the election security priority area in fiscal year 2023 based on their conversations with the White House and CISA about potential threats associated with the 2024 election. Officials said they had found that, in fiscal year 2022, grantees collectively spent approximately .002 percent of available Program funds toward election security as there was no minimum spend requirement in fiscal year 2022. In response to the concern about election security, in combination with the upcoming election, FEMA officials said the Secretary implemented a 3 percent minimum spend requirement for election security in fiscal year 2023 to increase investments in this area.

Figure 2 shows the National Priority Areas and corresponding minimum spending requirements for each fiscal year from 2020 through 2023.

¹⁷Grantees are required to prepare reports such as the State Preparedness Report and the Threat and Hazard Identification and Risk Assessment that identify the local threats and risks their communities face, which in turn used to prepare the National Preparedness Report which identifies the nation's risks. FEMA's Homeland Security Grant Program recommendations to the Secretary are partly informed by its analyses of these reports.

Figure 2: Six Department of Homeland Security National Priority Areas and Their Minimum Spend Requirements, Fiscal Years 2020 through 2023



Source: GAO analysis of Federal Emergency Management Agency (FEMA) information. | GAO-24-106327

^aIn addition to the National Priority Areas, grantees are required to spend a set percentage of Program funds toward Law Enforcement Terrorism Prevention Activities (LETPA). Much like the National Priority Areas, the percentage grantees must spend toward LETPA activities has increased

since fiscal year 2020. For reference, grantees were required to spend 25 percent of Program funds toward LETPA activities in fiscal year 2020, which increased to 35 percent for fiscal year 2023.

^bDHS did not implement a minimum spend requirement for cybersecurity and election security in fiscal year 2022.

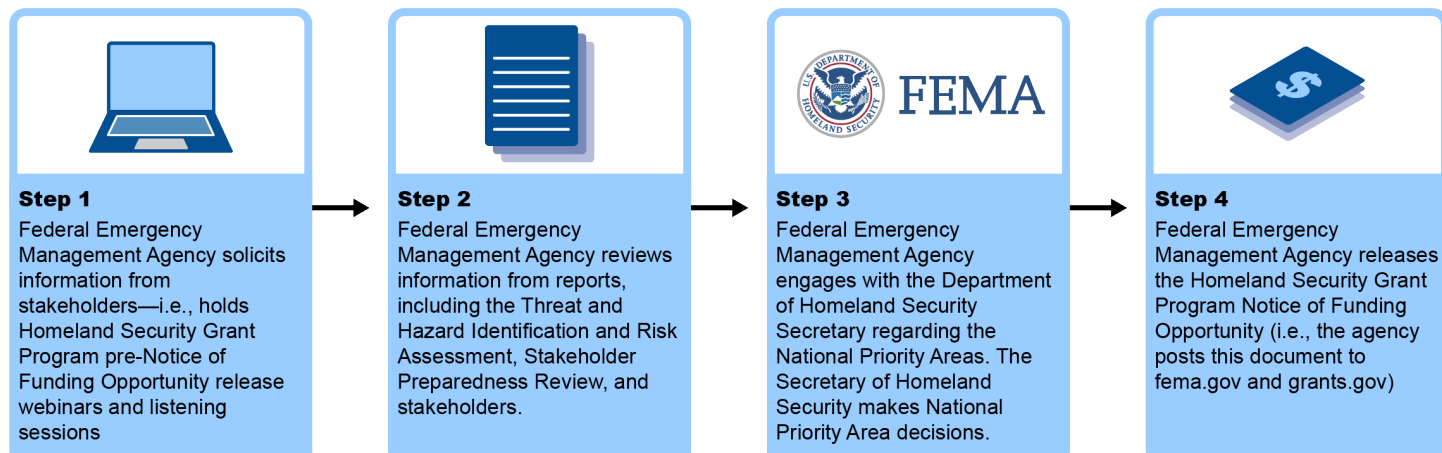
^cFor fiscal years 2022 and 2023, DHS required grantees to spend a minimum 30 percent of their total Program funds on the National Priority Areas. However, unlike in fiscal years 2020 and 2021, grantees had the discretion in fiscal year 2022 and 2023 to allocate 18 percent and 15 percent respectively to any National Priority Area, as opposed to a specific National Priority Area.

^dThe six National Priority Areas for fiscal year 2023 include: (1) Soft targets/Crowded Places (2) Information Sharing (3) Cybersecurity (4) Domestic Violent Extremism (5) Community Preparedness and Resilience (6) Election Security.

^e“Information sharing” is also referred to as (1) “enhancing information and intelligence sharing and cooperation with federal agencies, including DHS” and (2) “enhancing information and intelligence sharing and analysis” in the 2020 and 2023 Homeland Security Grant Program Notices of Funding Opportunity respectively.

Figure 3 shows DHS’s process for making changes to the National Priority Areas.

Figure 3: Homeland Security Grant Program Procedural Steps before Release of the Notice of Funding Opportunity, as Described by FEMA Officials



Source: GAO analysis of FEMA information, GAO icons. | GAO-24-106327

FEMA officials noted that while they provide information and recommendations to the Secretary, they do not determine changes to the National Priority Areas. Similarly, CISA and I&A officials told us that they provided threat and other information to the Secretary to inform changes to the National Priority Areas. However, they did not participate in the Secretary’s final decision to establish the National Priority Areas or corresponding spending requirements.

DHS Has Not Fully Documented its Rationale For Making National Priority Area Changes

A Mobile Rapid Communications Unit Vehicle Funded by the Homeland Security Grant Program.



Source: GAO observation of a Chicago UASI emergency response equipment display at the 2023 National Homeland Security Conference. | GAO-24-106327

DHS has established a process for making changes to the National Priority Areas but has not fully documented its rationale for the changes.

FEMA officials told us they aim to use the National Priority Areas, and the current suite of terrorism preparedness grants, as mechanisms for national coordination on mitigating specific risks. According to FEMA officials, this vision or rationale can be captured in a variety of ways. This can include a decision memorandum that finalizes the Secretary's changes to the priority areas, in meetings the Secretary holds with internal stakeholders, and via email. However, FEMA officials added that the memo is not consistently produced as the decisions are sometimes made verbally. Specifically, neither DHS or FEMA documented the rationale, information used, or stakeholders consulted (procedural steps 1 and 3 in figure 3) that factored into the Secretary's National Priority Area decisions.

The Homeland Security Grant Program Notices of Funding Opportunity for fiscal years 2020 through 2023 state that the purpose of the National Priority Areas is for grantees to meet the most serious and unique threats the nation faces each year.¹⁸ However, neither DHS or FEMA have specified how or why the Secretary came to identify the greatest risks or threats the National Priority Areas aim to address for fiscal years 2020 through 2023. Specifically, FEMA officials were unable to provide documentation that captured the methodology the Secretary used for making National Priority Areas changes to address the most serious threats for each National Priority Area. According to FEMA officials, the exact processes or information the Secretary used for National Priority Area decisions were not documented because they were not present at meetings the Secretary held for National Priority Area changes and attendees did not document these discussions.

Additionally, according to FEMA officials, FEMA leadership involved in initial National Priority Area discussions with the Secretary for fiscal year 2020 are no longer with the agency and therefore cannot shed light on prior decision-making. FEMA officials also said they could not tell how National Priority Area decisions were made after fiscal year 2020 as FEMA did not document the process or discussions that led to the changes. As a result, FEMA officials could not identify specific stakeholders consulted year-to-year as this aspect is at the discretion of

¹⁸Department of Homeland Security Homeland Security Grant Program Notice of Funding Opportunity for fiscal years 2020 through 2023.

the Secretary. FEMA officials told us it is not necessary for all officials to attend each meeting related to the National Priority Areas.

Standards for Internal Control in the Federal Government state that management should clearly document internal control and all transactions and significant events in a manner that allows the documentation to be readily available for examination. The documentation may appear in management directives, administrative policies, or operating manuals in either paper or electronic form, and the documentation and records should be properly managed and maintained.¹⁹

Without fully documenting the process and information that demonstrate the rationale for changing the National Priority Areas, there is limited transparency for how or why these decisions are made. Moreover, internally documenting the process DHS is using for making changes would help ensure continuity of institutional knowledge about the program when staff transition to other roles or a change in administration.

DHS Has Not Fully Communicated With Stakeholders About National Priority Area Changes Nor Consistently Conducted Targeted Outreach to Address Other Stakeholder Challenges

FEMA did not communicate with stakeholders in fiscal year 2020 when it established the National Priority Areas and has not consistently conducted targeted outreach to address other challenges stakeholders are experiencing. FEMA officials said that because the fiscal year 2020 implementation of the National Priority Area changes was made solely at the Secretary's discretion, they had no visibility into the process. As a result, they were not aware of the changes prior to implementation and therefore could not communicate the changes to grantees or solicit their input in advance. Ten out of the 16 grantees we spoke with said FEMA conducted little to no outreach or did not solicit grantee feedback regarding the impact of the National Priority Areas prior to their introduction in fiscal year 2020.²⁰ One grantee said FEMA conducted some level of outreach before the issuance of the Notice of Funding Opportunity and two other grantees could not recall FEMA's outreach in 2020. Additionally, seven out of the 16 grantees also stated that they were either surprised by the National Priority Areas or not aware of the

¹⁹[GAO-14-704G](#)

²⁰We asked selected grantees a series of semi-structured interview questions to gain their perspectives on DHS and FEMA's stakeholder outreach, process for making changes, reporting requirements, and general impact of the National Priority Areas. Some of the questions solicited open ended responses. Grantee summary statements included throughout this report emerged as common themes from those interviews. Not all grantees contributed to discussions or commented on themes related to each summary statement.

extent of the changes until issuance of the Notice of Funding Opportunity. In comparison, one grantee said they were not surprised by the National Priority Areas.

According to FEMA officials, the agency currently communicates National Priority Area information to grantees through information bulletins, email notifications, and FEMA-Grant Programs Directorate's Twitter account, all of which link to FEMA resources. Additionally, FEMA shared guidance and information about program changes with grantees through webinars, technical assistance calls, and town hall meetings. Officials also said that they have increased efforts to interface with stakeholders in the fiscal years 2021 through 2023 grant cycles to obtain program feedback. This information is communicated to the Secretary, who factors this feedback in his decision when implementing changes to the National Priority.

FEMA's Grant Programs Directorate also held a series of listening sessions in 2021 with approximately 300 Program stakeholders to obtain feedback.²¹ Among other suggestions to improve FEMA's communication with stakeholders, participants of the listening sessions requested that FEMA: 1) release any planned or potential changes to National Priority Areas prior to the release of the Notices of Funding Opportunity; and 2) ensure clear and consistent flow of information within FEMA and then to stakeholders. Further, in fiscal year 2023 FEMA held six pre and five post Notices of Funding Opportunities webinars to provide guidance on implementing National Priority Area requirements.²² Six out of the 16 grantees we interviewed agreed that FEMA's communication and outreach has improved since the National Priority Areas were first established in 2020.

However, grantees told us that these efforts were not sufficient. Grantees cited lack of communication regarding changes as an ongoing challenge affecting their ability to plan and meet National Priority Area requirements. Specifically, nine of the 16 grantees said FEMA does not provide enough meaningful opportunities to solicit feedback regarding the impact of National Priority Area changes or engage with them on subsequent front-end policy changes for later grant cycles. However, three other grantees

²¹According to agency documents, these listening session participants included stakeholders from a variety of stakeholder groups such as grantees, FEMA Preparedness Officers, and Regional Staff.

²²FEMA held the first pre- Notices of Funding Opportunities webinar 18 days prior to the release of the fiscal year 2023 Notices of Funding Opportunities.

said FEMA solicits or considers recipient feedback. Additionally, 13 out of the 16 grantees told us there is minimal FEMA communication related to the “what, why, and how” regarding changes to the National Priority Areas ahead of final decisions, or stated they would benefit from additional lead-in time. In comparison, one grantee said FEMA is forthcoming regarding National Priority Area changes during national informational calls.

In addition to communication, grantees we spoke with cited several challenges regarding their implementation of the National Priority Areas. For example:

- 10 out of 16 grantees said delayed notification of changes and condensed Program grant application deadlines affect project planning.
- Grantees said it was difficult to meet requirements for some National Priority Areas, such as election security. For example, eight out of 16 grantees told us they had challenges meeting the election security National Priority Area due to a lack of subject matter expertise; availability of grant funding for election security under the Help American Vote Act of 2002; or absence of a regional need to address this issue.²³ One of the grantees said their jurisdiction purchased a single security barrier to satisfy the election security requirement, which the grantee said is restricted to use for election security purposes only. A FEMA official told us stakeholders cited similar issues, in addition to the misalignment between the availability of Program funding and the need for election security projects.
- Eight out of the 16 grantees said the National Priority Areas create competing interests amongst regional priorities. As a result, these grantees expressed the inability to address regional priorities or had to delay regional projects in order to meet National Priority spend requirements. For example, one grantee said they had to reorder planned priorities related to personnel, training, and equipment orders in order to meet minimum spend requirements. In addition, six grantees said they adjusted their spending strategy in order to meet

²³The Help America Vote Act (HAVA) was enacted in 2002 to make reforms to the nation’s voting processes, including making improvements in election administration, such as replacing aging voting equipment. Pub. L. No. 107-252, 116 Stat. 1666 (2002). In fiscal year 2018, funds under HAVA were provided for necessary expenses for activities to improve the administration of elections for Federal office, including to enhance election technology and make election security improvements. Pub. L. No. 115-141, 132 Stat. 348,561-562 (2018). Subsequently, funds were made available under the HAVA for the same purpose in fiscal year 2020. Pub. L. No 116-93, 133 Stat. 2317, 2460-61 (2019).

minimum spend requirements or had projects that overlapped with the National Priority Areas.

- Ten out of the 16 grantees said the National Priority Areas inflexible spending requirements constrain resources, are difficult to meet, or requested the need for additional flexibility. One grantee said they had heavily invested in cybersecurity and the minimum allocations forced them to spend more in this area than they would have otherwise. Further, the grantee said they had to reorder planned priorities related to personnel, training, and equipment to meet minimum spend requirements. However, another grantee said that the National Priority Areas provide enough flexibility and two other grantees said they had built-in flexibility to meet priority areas.

FEMA acknowledged some of the challenges noted above in the 2021 National Preparedness Report. The report stated that the National Priority Areas lead communities to assess their investment priorities based on specific grant program requirements, which may not always align with the areas of greatest need.²⁴ FEMA also acknowledged the challenges at a town hall meeting it hosted at the 2023 National Homeland Security Conference to discuss the Program. Further, in a March 2023 memorandum to the co-chairs of the Homeland Security Advisory Council, the Secretary requested, in relation to the Program challenges, that the council create a new subcommittee. The subcommittee is tasked with studying and making recommendations on revisions to the Program, to help ensure the agency is operating the program optimally, considering the changed threat landscape over the past 20 years.²⁵ However the subcommittee's mandate is broad and not specific to grantee communication.

FEMA has taken some steps to address some of the challenges stakeholders cited. For example, to address the lack of flexibility in minimum spend requirements, the Secretary dropped the minimum spend requirement for several National Priority Areas, thereby giving grantees more discretion to spend toward any of the six National Priority Areas for

²⁴FEMA's 2021 National Preparedness Report

²⁵The Homeland Security Advisory Council was established under the Federal Advisory Committee Act. Accordingly, certain committee documents are subject to public disclosure requirements. See 5 U.S.C. § 1009. For example, notes of committee meetings are to be published in the Federal Register and meeting minutes and other records are required to be made available for public inspection. We reviewed the notices published on the Federal Register related to the Homeland Security Advisory Committee and did not identify any notices related to the activities of this subcommittee since its creation.

fiscal year 2022.²⁶ FEMA officials also told us the agency did not make substantive changes to the Program in fiscal years 2022 and 2023 based on stakeholder feedback. The National Priority Areas, aside from election security, remained constant during this period.²⁷ Additionally, at the town hall meeting FEMA hosted at the 2023 National Homeland Security Conference, officials announced that the Secretary was committed to not making further changes to the National Priority Areas for the next 2 fiscal years. FEMA officials later clarified that the Secretary still has the discretion to make National Priority Area changes during this period, as needed, to address new or emerging threats in the evolving threat landscape.

According to FEMA officials, the agency cannot share impending changes of the National Priority Area because the information is pre-decisional and can only be shared on a need-to-know basis. Specifically, they stated that they do not want to mislead stakeholders by speculating what National Priority Area changes will be. Ultimately the agency wants to share changes as early as it can, according to FEMA officials, but doing so requires the Secretary to approve the changes first. According to FEMA officials, they cannot issue guidance until Homeland Security Grant Program funding amounts are determined by Congress and enacted by the president.

However, FEMA has not fully explored ways to better understand and address communication and challenges and other issues selected stakeholders cited with implementing National Priority Areas changes. For example, FEMA has not conducted targeted outreach to grantees or systematically solicited feedback from grantees on specific steps that could enhance communication. While the listening sessions in fiscal year 2021 provided an opportunity for grantees to provide input, FEMA has not held additional sessions since then.

Leading practices for organizational change management include effectively communicating with stakeholders to manage commitment and

²⁶According to agency guidance, grantees were allowed to dedicate up to 18 percent of the 30 percent total minimum National Priority Area spend requirement to any of the six National Priority Areas for fiscal year 2022. Similarly, for fiscal year 2023 grantees were allowed to spend up to 15 percent of the 30 percent total minimum National Priority Area spend requirement to any of the six National Priority Areas.

²⁷Specifically, DHS established a spending requirement for the election security National Priority Area at 3 percent for fiscal year 2023. Comparatively, there was no election security spend requirement for fiscal year 2022.

identifying and addressing potential barriers to change. This includes: (1) communicating the what, when, why, and how of the change frequently, and in a targeted and compelling manner and (2) sustaining change through ongoing communication, consultations, and representation of stakeholders.²⁸

Additionally, identifying and addressing potential barriers to change leading practice states that organizations should: (1) take steps to identify and understand potential resistance barriers or roadblocks throughout the change efforts and (2) take actions to address barriers that might derail change efforts when they arise, such as examining daily activities of impacted groups experiencing change to identify and understand legitimate causes of resistance caused by design, execution, or implementation issues.²⁹ By conducting targeted outreach to stakeholders, FEMA could better understand and address the communication and other challenges stakeholders face with implementing the National Priority Areas. Doing so could enhance grantees' planning efforts and their ability to coordinate with local partners to identify meaningful projects that adequately address each National Priority Area. This targeted outreach effort could include hosting additional listening sessions, similar to those FEMA hosted in fiscal year 2021, or providing additional opportunities to specifically solicit grantee feedback on potential National Priority changes FEMA plans to recommend to the Secretary.

FEMA Monitors Grant Project Alignment with National Priority Areas and Data Show that Approved Projects Generally Aligned with These Areas

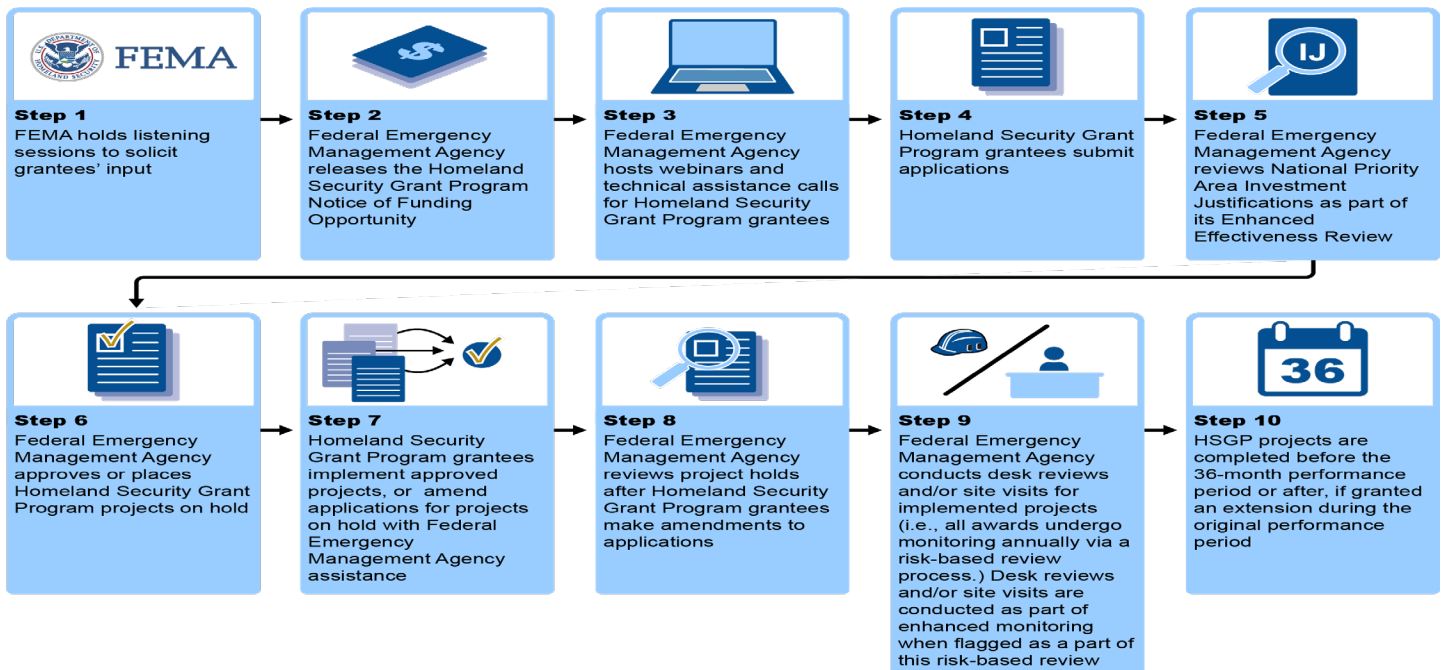
²⁸[GAO-23-106685](#)

²⁹[GAO-23-106685](#)

FEMA Takes Various Steps to Ensure Grant Projects Align with National Priorities

FEMA's process for ensuring that Homeland Security Grant Program projects align with National Priority Areas consists of (1) providing grantees guidance for completing grant applications and developing projects that align with these priority areas; (2) conducting an effectiveness review in conjunction with internal stakeholders after applicants submit projects for funding; and (3) monitoring grantees' project implementation.³⁰ Figure 4 shows the full project cycle of the Homeland Security Grant Program, from the time FEMA solicits grantees' input in advance of publishing project requirements in the Notice of Funding Opportunity, to when grantees fully implement projects. Appendix III shows examples of projects for each National Priority Area.

Figure 4: Homeland Security Grant Program Project Cycle



Source: GAO analysis of FEMA information, GAO icons. | GAO-24-106327

FEMA Grant Programs Directorate officials told us that they provide guidance to Homeland Security Grant Program applicants via webinars,

³⁰According to FEMA, an Effectiveness Review determines whether a proposed National Priority Area project is clear, logical, and reasonable to address the priority area of interest and contribute to a culture of national preparedness. It considers factors such as how well the project is described and how well the project addresses the objectives and strategies of the priority area.

technical assistance calls, and town hall meetings following issuance of the Notice of Funding Opportunity, to ensure that projects align with National Priority Areas. Officials also provide other technical assistance—such as subject matter expert panel consultation—as well as other resources, to assist states and UASIs with completing program applications in accordance with the Notice of Funding Opportunity guidance. Officials representing 12 of the 16 grantees we selected for our review told us that FEMA provides guidance and technical assistance for project application completion. The technical assistance FEMA provides has increased in frequency and quality over the years, according to some of the state and UASI officials.

Homeland Security Grant Program Project Example

Recipient: Houston Urban Area

Funding Amount: \$720,821

National Priority Area: Combating Domestic Violent Extremism

Project Start Date: 09/01/21

Project End Date: 08/01/23

Project Type: Equipment

Purpose: To support enhancements of the Houston Police Department Type 1 Bomb Squad through training and upgrades of some equipment and gear with the newest technology such as: one-ton rapid response vehicles, robotics upgrades, and portable x-ray systems as well as training classes.

Expected Impact: Enhance a critical special response team, thereby reducing the risk of a terrorist attack within the greater Houston region.

Source: GAO analysis of FEMA data. | GAO-24-106327

FEMA Grant Programs Directorate officials, in conjunction with internal stakeholders, such as CISA and I&A, also conduct a review of proposed National Priority Area projects to determine if the project investments align with the National Priority Areas. This review entails analysis of Investment Justifications which Program grantees are required to develop to demonstrate how proposed projects support terrorism preparedness.³¹ According to Program guidance, failure by a grantee to propose project investments that align with the National Priority Areas and meet minimum spending requirements for each, will result in the grantee having a portion of their funds (up to 30 percent), placed on hold until the grantee addresses the deficiencies.

From fiscal years 2020 through 2022, FEMA placed 280 out of 7,413 Program projects on hold. According to FEMA officials, 195 of the 280 holds were placed on projects that were deemed ineffective during the effectiveness review, while the remaining 85 were placed on projects that did not meet the minimum spending requirements. According to FEMA's Program data, reasons for the ineffective project holds included insufficient project detail, unallowable project type, and non-conformance with a particular National Priority Area.

Table 3 shows the number of holds FEMA placed on Homeland Security Grant Program SHSP and UASI projects for fiscal years 2020 through 2022, by grant type, and funding holds amount.

³¹In addition to demonstrating how the proposed investments support terrorism preparedness, Investment Justifications should demonstrate how the investments support closing capability gaps or sustaining capabilities identified in the community's Threat and Hazard Identification Risk Assessment and Stakeholder Preparedness Review process.

Table 3: Number of Homeland Security Grant Program Projects Federal Emergency Management Agency (FEMA) Placed on Hold from Fiscal Years 2020 through 2022

State Homeland Security Program (SHSP) and Urban Areas Security Initiative (UASI) Projects	Fiscal Year					
	2020		2021		2022	
	Number of holds	Funding holds amount	Number of holds	Funding holds Amount	Number of holds	Funding holds amount
SHSP	71	\$8,511,439	87	\$6,927,436	86	\$21,658,103
UASI	18	\$3,894,212	7	\$557,216	11	\$2,498,498
Total	89	\$12,405,651	94	\$7,484,652	97	\$24,156,601

Source: GAO analysis of Federal Emergency Management Agency data. | GAO-24-106327

FEMA Grant Programs Directorate officials also require grantees to submit several performance and financial reports throughout the year to assist FEMA with monitoring and evaluating Program projects.

Additionally, FEMA Grant Programs Directorate officials conduct desk reviews as well as site visits to help ensure that approved projects are implemented effectively.³² FEMA requires grantees to take suggested corrective actions to bring projects that do not align with program goals into compliance. According to FEMA’s Program data, from fiscal year 2020 through 2022, FEMA conducted 42 desk reviews and 5 site visits. Table 4 shows the number of desk reviews and site visits FEMA conducted each fiscal year from fiscal years 2020 through 2022. FEMA did not conduct any site visits in fiscal years 2020 and 2021 due to the COVID pandemic.

Table 4: Type and Number of Monitoring Activity the Federal Emergency Management Agency (FEMA) Conducted from Fiscal Years 2020 through 2022

Completed Monitoring Type	Fiscal Year			Total
	2020	2021	2022	
Desk Review	20	12	10	42
Site Visit	0	0	5	5
Total	20	12	15	47

Source: GAO analysis of FEMA data. | GAO-24-106327

³²Desk reviews are FEMA’s assessments of project progress and accomplishments. These reviews include FEMA’s assessments of grant-related records and interviews of grantees’ staff and contractors regarding the program. According to FEMA, desk reviews present an opportunity for officials to provide any required technical assistance to grantees.

From fiscal year 2020 through 2021, FEMA issued 14 corrective actions. Most of the corrective actions required grantees to update their grant policies and procedures. For example, in 2021 FEMA issued a corrective action requiring a grantee to develop monitoring protocols that included how the grantee selects sub-recipients for monitoring, and a monitoring schedule. See table 5 for the number of corrective actions FEMA issued each fiscal year and the cause for the corrective actions. As of May 2023, one of the 14 corrective actions had not been fully addressed.

Table 5: Number of Corrective Actions the Federal Emergency Management Agency (FEMA) Issued by Cause from Fiscal Years 2020 through 2021

Cause	Fiscal Year		Total
	2020	2021	
Insufficient/Improper Documentation	0	1	1
Oversight	0	1	1
Policy, Process, and Procedure	10	2	12
Total	10	4	14

Source: GAO analysis of FEMA data. | GAO-24-106327

Approved Projects Generally Align with National Priority Areas

Based on our analysis of FEMA’s data, approved grant projects for fiscal years 2020 through 2022 generally aligned with requirements for the National Priority Areas. Specifically, we found that grantees proposed projects for each required National Priority Area for each fiscal year.

Additionally, in total, SHSP and UASI grantees surpassed the minimum spending requirements for each National Priority Area. For example, DHS added domestic violent extremism as a National Priority Area in fiscal year 2021. GAO’s analysis of FEMA data found that grantees met required spending thresholds for this area and implemented associated projects.

Table 6 shows the percentage of actual SHSP spending for each National Priority Area from fiscal years 2020 through 2022.

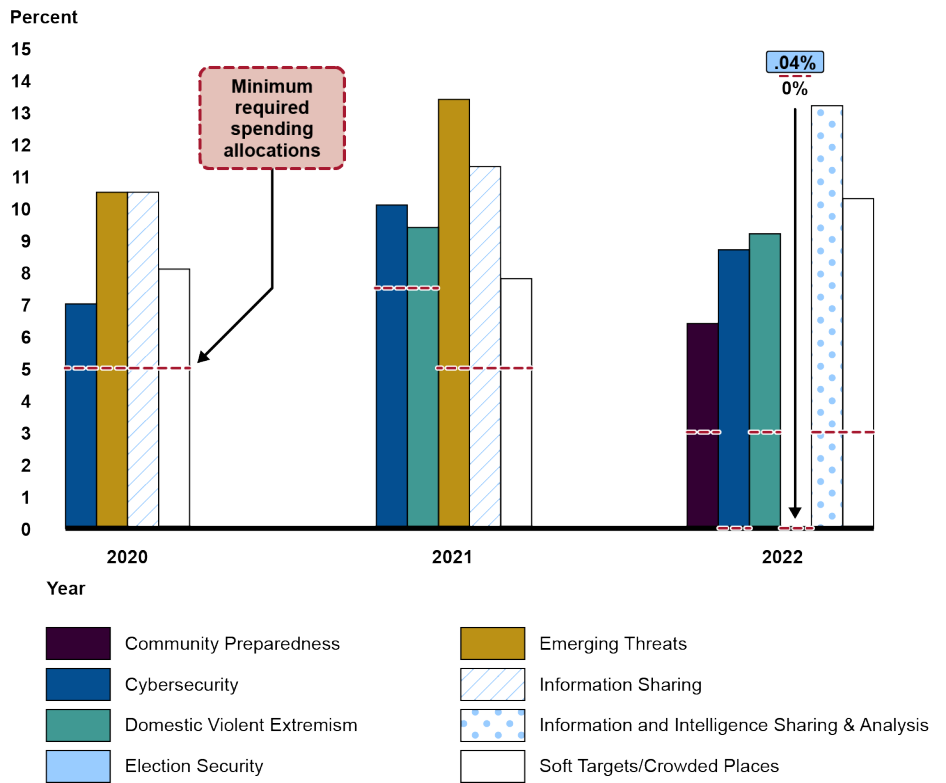
Table 6: Percentage of State Homeland Security Program Grant Awards for each National Priority Area for Fiscal Years 2020 through 2022

National Priority Area	Fiscal Year		
	2020	2021	2022
	Funding Percentage	Funding Percentage	Funding Percentage
Community Preparedness	N/A	N/A	6.4%
Cybersecurity	7.0%	10.1%	8.7%
Domestic Violent Extremism	N/A	9.4%	9.2%
Election Security	N/A	N/A	.04%
Emerging Threats	10.5%	13.4%	N/A
Information Sharing	10.5%	11.3%	N/A
Information and Intelligence Sharing & Analysis	N/A	N/A	13.2%
Soft Targets/Crowded Places	8.1%	7.8%	10.3%

Source: GAO analysis of Federal Emergency Management Agency data. | GAO-24-106327

As indicated in figure 5, the percentage of actual spending was greater than the required minimum spending for each National Priority Area for all 3 fiscal years. For example, in fiscal year 2020, DHS required 5% minimum spending for each of four National Priority Areas. States exceeded the required minimum spending for all four National Priority Areas that fiscal year.

Figure 5: Percentage of State Homeland Security Program Awards for Each National Priority Area for Fiscal Years 2020 through 2022



Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-24-106327

Similarly, table 7 shows the percentage of actual UASI spending for each National Priority Area from fiscal years 2020 through 2022.

Table 7: Percentage of Urban Areas Security Initiative Grant Awards for each National Priority Area for Fiscal Years 2020 through 2022

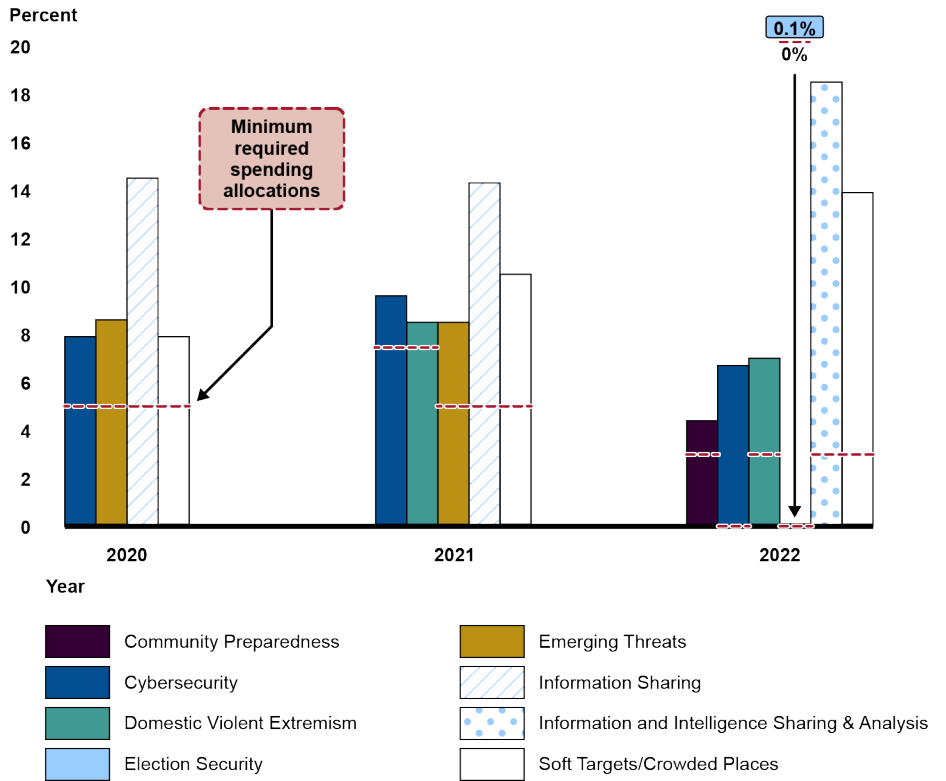
National Priority Area	Fiscal Year		
	2020	2021	2022
Community Preparedness	N/A	N/A	4.4%
Cybersecurity	7.9%	9.6%	6.7%
Domestic Violent Extremism	N/A	8.5%	7.0%

National Priority Area	Fiscal Year		
	2020	2021	2022
	Funding Percentage	Funding Percentage	Funding Percentage
Election Security	N/A	N/A	0.1%
Emerging Threats	8.6%	8.5%	N/A
Information Sharing	14.5%	14.3%	N/A
Information and Intelligence Sharing & Analysis	N/A	N/A	18.5%
Soft Targets/Crowded Places	7.9%	10.5%	13.9%

Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-24-106327

As indicated in figure 6, the percentage of actual spending was greater than the required minimum spending for each National Priority Area for all three fiscal years. For example, in fiscal year 2022, DHS required 3 percent minimum spending for each of four National Priority Areas. Urban areas exceeded the required minimum spending for all four National Priority Areas that fiscal year.

Figure 6: Percentage of Urban Areas Security Initiative Grant Awards for each National Priority Area for Fiscal Years 2020 through 2022



Source: GAO analysis of Federal Emergency Management Agency (FEMA) data. | GAO-24-106327

However, individually, some grantees did not meet the minimum spending requirements for some priority areas. Based on our analysis of FEMA’s Program data, 25 out of the 278 Program grantees did not meet the minimum spending requirements for one or more National Priority for fiscal years 2020 through 2022. As previously mentioned, to ensure grantees comply with grant funding requirements, FEMA places funding holds on grantees that do not meet minimum spending requirements for the National Priority Areas until the grantees bring the projects into compliance.

Emergency Mobile Command Unit Vehicle Funded by the Homeland Security Grant Program.



Source: GAO observation of a Chicago UASI emergency response equipment display at the 2023 National Homeland Security Conference. | GAO-24-106327

According to FEMA officials, there are a variety of reasons why a grantee may not have met the required minimum spending requirement. For example, a grantee may not have submitted the complete project information at the time they submitted their application, which is when the data we analyzed was collected. Further, the determination as to whether minimum spend requirements are met is based on when the complete application is submitted. Grantees have the option of either submitting a complete application at the time grant applications are due, or submitting a complete application as part of the Biannual Strategy Implementation Report submission, which is due a few months after the project application deadline.

FEMA allocated National Priority Areas funding to six project types from fiscal years 2020 through 2022, as shown in table 8, with most of the funding dedicated to the purchase of equipment, followed by training, and planning. The number of projects increased annually by project type, correlating with the annual increase in funding for the National Priority Areas.

Table 8: Number of Projects and Funding Amounts by National Priority Areas Project Type from Fiscal Years 2020 through 2022

Project Type	Fiscal Year					
	2020		2021		2022	
	N ^a	Funding Amount	N	Funding Amount	N	Funding Amount
Equipment	255	\$198,710,283	297	\$180,922,522	379	\$297,681,045
Training	169	\$24,865,384	186	\$24,988,503	265	\$37,611,371
Planning	136	\$46,308,727	167	\$58,245,884	229	\$89,479,917
Organization	103	\$39,505,939	115	\$46,416,108	170	\$99,403,154
Exercises	59	\$5,950,425	65	\$7,128,852	100	\$6,503,879
Management & Administration	28	\$3,501,766	31	\$2,931,305	45	\$3,813,279
Total	750	\$318,842,526	861	\$320,633,176	1,188	\$534,492,646

Source: GAO analysis of Federal Emergency Management Agency information. | GAO-24-106327

^a"N" represents the number of projects.

Conclusions

With the continuously evolving threat environment the nation faces, DHS developed National Priority Areas for the Program in fiscal year 2020. DHS has made subsequent changes annually to help ensure that grants target the highest risks. However, DHS had not fully documented the rationale and process for making changes to the National Priority Areas. Doing so would help improve transparency for how or why these

decisions are made and ensure continuity of institutional knowledge about the program when staff transition to other roles or a change in administration occurs.

Though FEMA has enhanced its stakeholder communication efforts, stakeholders continue to cite communication, among other challenges, they experience with implementing National Priority Area changes. By conducting targeted outreach to stakeholders, FEMA could better understand and address these communication and other challenges stakeholders face with implementing National Priority Area changes. Doing so could enhance grantees' planning efforts and their ability to coordinate with local partners to identify meaningful projects that adequately address each National Priority Area.

Recommendations for Executive Action

We are making the following two recommendations to DHS and FEMA:

The Secretary of Homeland Security should fully document the rationale and process DHS uses for making changes to the National Priority Areas, including identifying the stakeholders it consulted, and the information it used for making the changes. (Recommendation 1).

The FEMA Administrator should conduct targeted outreach to stakeholders to better understand and address communication and other stakeholder challenges with implementing National Priority Area changes. (Recommendation 2).

Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. In its comments, reproduced in appendix IV, DHS and FEMA concurred with our findings and two recommendations.

In DHS's concurrence to our first recommendation that the agency fully document the rationale and process it uses for making changes to the National Priority Areas, including identifying the stakeholders it consulted, and the information it used for making the changes, FEMA stated that it was in the process of finalizing the Fiscal Year 2024 Homeland Security Grant Program decision memorandum. It added that once finalized, the memorandum will serve as the basis for documenting the workflow process and final determinations related to the Fiscal Year 2024 National Priority Areas. It estimated completing these changes by September 2024. To fully implement this recommendation, in addition to documenting the workflow process and final determinations of the National Priority Areas, FEMA should also include information on the rationale for selecting the National Priority Areas, as well as stakeholders the agency

consulted in making the final determinations. Including all of this information would improve transparency about the decision-making process and ensure continuity of institutional knowledge about the program when staff transition to other roles or a change in administration occurs. If implemented effectively, these actions could meet the intent of our recommendation.

Regarding the second recommendation that the agency conduct targeted outreach to stakeholders to better understand and address communication and other stakeholder challenges with implementing the National Priority Area changes, FEMA cited examples of multiple sessions it has hosted to solicit stakeholder feedback. Grantees we interviewed identified some of these sessions, but as we noted in this report, FEMA has not consistently conducted these outreach efforts. Engaging stakeholders in a consistent and targeted manner would enhance FEMA's ability to fully understand, and therefore address, the challenges stakeholders face with implementing National Priority Area changes. These actions, if implemented effectively, could meet the intent of our recommendation.

FEMA also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the Secretary of Homeland Security, the FEMA Administrator, and the appropriate congressional committees. If you or your staff have any questions about this report, please contact me at (404) 679-1875 or curriec@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix V. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

Sincerely yours,



Chris Currie
Director
Homeland Security and Justice

Appendix I: Total Homeland Security Grant Program Allocation to each State Homeland Security Program and Urban Areas Security Initiative for Fiscal Years 2020 through 2022

Table 9 and table 10 show the Homeland Security Grant Program funding allocations to each state and urban area for fiscal years 2020 through 2022, respectively.

Table 9: Total Homeland Security Grant Program Allocation to each State Homeland Security Program (SHSP) for Fiscal Years 2020 through 2022

State	Fiscal Year		
	2020	2021	2022
	Funding Amount	Funding Amount	Funding Amount
Alabama	\$4,287,500	\$4,602,500	\$4,847,500
Alaska	\$4,287,500	\$4,602,500	\$4,847,500
American Samoa	\$1,000,000	\$1,052,000	\$1,108,000
Arizona	\$4,287,500	\$4,602,500	\$4,847,500
Arkansas	\$4,287,500	\$4,602,500	\$4,847,500
California	\$62,011,000	\$59,220,807	\$57,035,623
Colorado	\$4,287,500	\$4,602,500	\$4,847,500
Connecticut	\$4,287,500	\$4,602,500	\$4,847,500
Delaware	\$4,287,500	\$4,602,500	\$4,847,500
District of Columbia	\$5,529,000	\$5,280,222	\$5,085,387
Florida	\$10,159,000	\$9,701,894	\$9,343,905
Georgia	\$5,750,000	\$5,491,278	\$5,288,656
Guam	\$1,000,000	\$1,052,000	\$1,108,000
Hawaii	\$4,287,500	\$4,602,500	\$4,847,500
Idaho	\$4,287,500	\$4,602,500	\$4,847,500
Illinois	\$15,107,000	\$14,427,260	\$13,894,910
Indiana	\$4,287,500	\$4,602,500	\$4,847,500
Iowa	\$4,287,500	\$4,602,500	\$4,847,500
Kansas	\$4,287,500	\$4,602,500	\$4,847,500
Kentucky	\$4,287,500	\$4,602,500	\$4,847,500
Louisiana	\$4,287,500	\$4,602,500	\$4,847,500
Maine	\$4,287,500	\$4,602,500	\$4,847,500
Maryland	\$7,692,000	\$7,345,897	\$7,074,841
Massachusetts	\$6,731,000	\$6,428,138	\$6,190,947
Michigan	\$5,529,000	\$5,280,222	\$5,085,387
Minnesota	\$4,287,500	\$4,602,500	\$4,847,500
Mississippi	\$4,287,500	\$4,602,500	\$4,847,500
Missouri	\$4,287,500	\$4,602,500	\$4,847,500
Montana	\$4,287,500	\$4,602,500	\$4,847,500

**Appendix I: Total Homeland Security Grant
Program Allocation to each State Homeland
Security Program and Urban Areas Security
Initiative for Fiscal Years 2020 through 2022**

State	Fiscal Year		
	2020	2021	2022
	Funding Amount	Funding Amount	Funding Amount
Nebraska	\$4,287,500	\$4,602,500	\$4,847,500
Nevada	\$4,287,500	\$4,602,500	\$4,847,500
New Hampshire	\$4,287,500	\$4,602,500	\$4,847,500
New Jersey	\$7,692,000	\$7,345,897	\$7,074,841
New Mexico	\$4,287,500	\$4,602,500	\$4,847,500
New York	\$73,968,000	\$70,639,800	\$68,033,267
North Carolina	\$5,529,000	\$5,280,222	\$5,085,387
North Dakota	\$4,287,500	\$4,602,500	\$4,847,500
Northern Mariana Islands	\$1,000,000	\$1,052,000	\$1,108,000
Ohio	\$6,731,000	\$6,428,138	\$6,190,947
Oklahoma	\$4,287,500	\$4,602,500	\$4,847,500
Oregon	\$4,287,500	\$4,602,500	\$4,847,500
Pennsylvania	\$8,846,000	\$8,447,973	\$8,136,252
Puerto Rico	\$4,287,500	\$4,602,500	\$4,847,500
Rhode Island	\$4,287,500	\$4,602,500	\$4,847,500
South Carolina	\$4,287,500	\$4,602,500	\$4,847,500
South Dakota	\$4,287,500	\$4,602,500	\$4,847,500
Tennessee	\$4,287,500	\$4,602,500	\$4,847,500
Texas	\$19,799,000	\$18,908,141	\$18,210,451
US Virgin Islands	\$1,000,000	\$1,052,000	\$1,108,000
Utah	\$4,287,500	\$4,602,500	\$4,847,500
Vermont	\$4,287,500	\$4,602,500	\$4,847,500
Virginia	\$8,846,000	\$8,447,973	\$8,136,252
Washington	\$6,731,000	\$6,428,138	\$6,190,947
West Virginia	\$4,287,500	\$4,602,500	\$4,847,500
Wisconsin	\$4,287,500	\$4,602,500	\$4,847,500
Wyoming	\$4,287,500	\$4,602,500	\$4,847,500
Total	\$415,000,000	\$415,000,000	\$415,000,000

Source: GAO analysis of State Homeland Security Program grants. | GAO-24-106327

Appendix I: Total Homeland Security Grant Program Allocation to each State Homeland Security Program and Urban Areas Security Initiative for Fiscal Years 2020 through 2022

Table 10: Total Homeland Security Grant Program Allocation to each Urban Areas Security Initiative for Fiscal Years 2020 through 2022

State	UASI Area	Fiscal Year		
		2020 Funding Amount	2021 Funding Amount	2022 Funding Amount
Arizona	Phoenix Area	\$5,250,000	\$5,250,000	\$5,250,000
California	Anaheim/Santa Ana Area	\$5,250,000	\$5,250,000	\$5,250,000
	Bay Area	\$37,500,000	\$37,500,000	\$37,049,000
	Los Angeles/Long Beach Area	\$68,000,000	\$68,000,000	\$67,182,000
	Riverside Area	\$3,500,000	\$3,900,000	\$3,900,000
	Sacramento Area	\$3,500,000	\$3,800,000	\$3,800,000
	San Diego Area	\$16,900,000	\$16,900,000	\$16,696,000
Colorado	Denver Area	\$3,500,000	\$3,900,000	\$3,900,000
District of Columbia	National Capital Region	\$51,750,000	\$51,750,000	\$51,127,000
Florida	Miami/Fort Lauderdale Area	\$14,750,000	\$14,750,000	\$14,750,000
	Orlando Area	\$3,500,000	\$3,800,000	\$3,800,000
	Tampa Area	\$3,500,000	\$3,800,000	\$3,800,000
Georgia	Atlanta Area	\$6,250,000	\$6,250,000	\$6,700,000
Hawaii	Honolulu Area	\$3,500,000	\$3,800,000	N/A
Illinois	Chicago	\$68,000,000	\$68,000,000	\$67,182,000
Indiana	Indianapolis Area	N/A	N/A	\$1,500,000
Louisiana	New Orleans Area	\$3,500,000	N/A	\$1,500,000
Maryland	Baltimore Area	\$4,250,000	\$4,250,000	\$3,800,000
Massachusetts	Boston Area	\$16,900,000	\$16,900,000	\$16,900,000
Michigan	Detroit Area	\$5,250,000	\$5,250,000	\$5,250,000
Minnesota	Twin Cities Area	\$5,250,000	\$5,250,000	\$5,250,000
Missouri	Kansas City Area	N/A	N/A	\$1,500,000
	St. Louis Area	\$3,500,000	\$3,800,000	\$3,800,000
Nevada	Las Vegas Area	\$5,250,000	\$5,250,000	\$5,250,000
New Jersey	Jersey City/Newark Area	\$19,050,000	\$19,050,000	\$18,915,000
New York	New York City Area	\$178,750,000	\$178,750,000	\$176,599,000
North Carolina	Charlotte Area	N/A	\$3,800,000	\$3,800,000
Ohio	Cincinnati Urban Area	N/A	N/A	\$1,500,000
	Cleveland Area	N/A	N/A	\$1,500,000
Oregon	Portland Area	\$3,500,000	\$3,800,000	\$3,800,000
Pennsylvania	Philadelphia Area	\$16,900,000	\$16,900,000	\$16,900,000
	Pittsburgh Area	\$3,500,000	N/A	\$1,500,000

**Appendix I: Total Homeland Security Grant
Program Allocation to each State Homeland
Security Program and Urban Areas Security
Initiative for Fiscal Years 2020 through 2022**

State	UASI Area	Fiscal Year		
		2020	2021	2022
		Funding Amount	Funding Amount	Funding Amount
Texas	Dallas/Fort Worth/Arlington Area	\$16,900,000	\$16,900,000	\$16,900,000
	Houston Area	\$24,600,000	\$24,600,000	\$24,600,000
	San Antonio Area	\$3,500,000	\$3,800,000	\$3,800,000
Virginia	Hampton Roads Area	\$3,500,000	\$3,800,000	\$3,800,000
Washington	Seattle Area	\$6,250,000	\$6,250,000	\$6,250,000
Total		\$615,000,000	\$615,000,000	\$615,000,000

Source: GAO analysis of Urban Areas Security Initiative grants. | GAO-24-106327

Appendix II: Organizational Change Management Leading Practices

Table 11 outlines the eight leading practices for organizational change management that we have identified in prior reports. We used these practices for evaluating FEMA’s implementation of changes to the National Priority Areas in fiscal years 2021 through 2023.

Table 11: Organizational change management leading practices

Leading Practice	Leading Practice Definition
Developing a vision for change	The vision for change effectively identified the compelling need for change and benefits of the desired change that can motivate stakeholders to accept and willingly participate to make the change successful. This includes understanding the business context and developing strategies to define the change approach through a formalized methodology.
Identifying stakeholders	Identifying stakeholders, which are individuals, groups, departments, and organizations that have a direct interest in the change effort and will be directly affected by and/or have influence over the change effort. This also includes, obtaining stakeholder buy-in by assessing the anticipated impact of the change. Given their power to sustain or derail a change initiative, stakeholders, and their concerns should be identified and understood.
Effectively communicating with stakeholders	Communicating the what, when, why, and how of the change frequently, and in a targeted and compelling manner. This includes sustaining change through ongoing communication, consultations, and representation of stakeholders.
Identifying and addressing stakeholder’s potential barriers to change	Steps should be taken to identify and understand potential resistance barriers or roadblocks throughout the change efforts. Actions should be taken to address barriers that might derail change efforts when they arise.
Increasing workforce skills and competencies	Empower stakeholders with the knowledge of how to successfully change and gain the full benefits from the change by training them in the new processes, skills, and competencies needed throughout the transition.
Assessing the readiness for change	Periodic checkpoints, analysis, and metrics should be used to measure the state of readiness. Any potential problems should be resolved in a timely fashion.
Assessing the results of the change	Periodic checkpoints, analysis, and metrics should be used to measure the state of readiness. Any potential problems should be resolved in a timely fashion.

Source: [GAO-22-105059](#), [GAO-23-106685](#). | [GAO-24-106327](#)

Appendix III: List of fiscal year 2023 National Priority Areas along with project examples for each issue area.

Table 12 shows examples of project types for each of the fiscal 2023 National Priority Areas.

Table 12: National Priority Areas and Example Project Type

National Priority Area	Example Project Type
Enhancing Cybersecurity	<ul style="list-style-type: none"> Cybersecurity risk assessments Migrating online services to the “.gov” internet domain Cybersecurity training and planning
Enhancing the Protection of Soft Targets/ Crowded Places	<ul style="list-style-type: none"> Physical security enhancements Security cameras (closed-circuit television [CCTV]) Fencing, gates, barriers, etc. Unmanned aircraft system detection technologies
Enhancing information and intelligence sharing and analysis	<ul style="list-style-type: none"> Fusion center operations (Fusion Center project will be required under this investment, no longer as a stand-alone investment) Identification, assessment, and reporting of threats of violence Joint intelligence analysis training and planning with DHS officials and other entities designated by DHS
Combating Domestic Violent Extremism	<ul style="list-style-type: none"> Open-source analysis of disinformation and misinformation campaigns, targeted violence and threats to life, including tips/leads, and online/social media-based threats Execution and management of threat assessment programs to identify, evaluate, and analyze indicators and behaviors
Enhancing Community Preparedness and Resilience	<ul style="list-style-type: none"> Establish, train, and maintain Community Emergency Response Teams (CERT) and Teen CERT, with a focus on historically underserved communities, including procurement of appropriate tools, equipment and training aides Provide continuity training, such as FEMA’s Organizations Preparing for Emergency Needs training, to faith-based organizations, local businesses, and community-based organizations such as homeless shelters, food pantries, nonprofit medical providers and senior care facilities to bolster their resilience to all hazards Partner with local school districts to deliver the Student Tools for Emergency Planning curriculum or other educational programming to guide students on how to create emergency kits and family communications plans
Enhancing Election Security	<ul style="list-style-type: none"> Physical/site security measures – e.g., locks, shatterproof glass, alarms, access controls, etc. Online harassment and targeting prevention services Public awareness/preparedness campaigns discussing election security and integrity measures.

Source: Department of Homeland Security fiscal year 2023 Homeland Security Grant Program Notice of Funding Opportunity. | GAO-24-106327

Appendix IV: Comments from the Department of Homeland Security

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



**Homeland
Security**

December 8, 2023

Chris Currie
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-24-106327, "HOMELAND SECURITY GRANTS: DHS Implemented National Priority Areas but Could Better Document and Communicate Changes"

Dear Mr. Currie:

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

DHS leadership is pleased to note GAO's positive recognition of the steps the Federal Emergency Management Agency (FEMA) has taken to strengthen its risk assessment model, such as implementing recommendations to fully document the model's assumptions and justifications, perform additional in-depth analyses, and coordinate an external peer review.¹ GAO also noted that FEMA took actions to implement recommendations² related to developing a national federal-level capability gap analysis, which informed nationwide risk management to support planning, investments, and operational decisions for stakeholders across the Nation.

The goal of the Homeland Security Grant Program (HSGP) is to strengthen homeland security across the nation while being flexible enough to pivot, as appropriate, to

¹GAO-18-354, "HOMELAND SECURITY GRANT PROGRAM: Additional Actions Could Further Enhance FEMA's Risk-Based Grant Assessment Model," dated September 6, 2018 (see: <https://www.gao.gov/products/gao-18-354>)

²GAO-20-297, "National Preparedness: Additional Actions Needed to Address Gaps in the Nation's Emergency Management Capabilities," dated May 4, 2020 (see: <https://www.gao.gov/products/gao-20-297>)

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

emphasize mitigating risk areas identified by DHS^{3:4} DHS remains committed to working in partnership with our state, local, territorial, and tribal nation partners to strengthen our processes towards that end, and managing an award process that is consistent with federal grant requirements.

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

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

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H
CRUMPACKER
Date: 2023.12.08 07:34:21 -05'00'

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

Enclosure

³ "National Preparedness System;" <https://www.fema.gov/emergency-managers/national-preparedness/system>

⁴ "National Preparedness Goal" dated September 2015; https://www.fema.gov/sites/default/files/2020-06/national_preparedness_goal_2nd_edition.pdf

**Enclosure: Management Response to Recommendations
Contained in GAO-24-106327**

GAO recommended that the Secretary of Homeland Security:

Recommendation 1: Fully document the rationale and process DHS uses for making changes to the National Priority Areas, including identifying the stakeholders it consulted, and the information it used for making the changes.

Response: Concur. FEMA Grant Programs Directorate (GPD) is in the process of routing the fiscal year (FY) 2024 HSGP decision memorandum through FEMA leadership for the Secretary of Homeland Security's consideration and approval. Once finalized, this will serve as the basis for documenting the workflow process and final determinations relative to the FY 2024 National Priority Areas. Estimated Completion Date: September 30, 2024.

GAO recommended that the FEMA Administrator:

Recommendation 2: Conduct targeted outreach to stakeholders to better understand and address communication and other stakeholder challenges with implementing National Priority Area changes.

Response: Concur. Throughout 2023, FEMA GPD hosted multiple stakeholder sessions in a variety of settings on this issue. This included: (1) 10 discrete listening sessions with states and urban areas involving more than 340 stakeholders; (2) sessions at the National Homeland Security Conference in July 2023 with more than 100 state and urban area stakeholders; and (3) sessions most recently, at the FEMA-State Administrative Agency Summit in October 2023 with over 100 state administrative agency stakeholders. FEMA GPD intends to continue these engagements throughout 2024 and beyond to better understand and address stakeholder challenges with implementing National Priority Area changes.

We request that GAO consider this recommendation resolved and closed, as implemented.

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Chris P. Currie, (404) 679-1875 or curriec@gao.gov

Staff Acknowledgement

In addition to the contact named above, Aditi Archer (Assistant Director), Edith Sohna (Analyst-in-Charge), Bonnie Binggeli, Benjamin Crossley, Dale Dominick, Yasmine Evans, Michele Fejfar, Minette Richardson, Heidi Nielson made significant contributions to this report.

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