



January 2025

# MARITIME CARGO SECURITY

## Additional Efforts Needed to Assess the Effectiveness of DHS's Approach

# GAO Highlights

Highlights of [GAO-25-106953](#), a report to congressional committees

## Why GAO Did This Study

The U.S. economy depends on the quick and efficient flow of millions of tons of cargo each day throughout the global supply chain. However, U.S.-bound vessels and maritime cargo shipments are vulnerable to criminal activity or terrorist attacks that could disrupt operations and limit global economic growth and productivity.

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to assess federal efforts to secure U.S.-bound vessels and maritime cargo from national security-related risks. This report addresses (1) how DHS secures these vessels and cargo from supply chain risks, (2) the extent that DHS used selected leading collaboration practices, and (3) the extent that DHS assessed its approach.

GAO reviewed agency policies, procedures, and collaboration efforts and government-wide strategy documents, and assessed DHS collaboration efforts against five relevant leading practices identified in prior GAO work. GAO also interviewed Coast Guard and CBP officials from 16 field locations at a non-generalizable sample of eight U.S. seaports selected for varying volumes of cargo and diversity of geographic regions.

## What GAO Recommends

GAO recommends that the Coast Guard, with sector partners, develop objective, measurable, and quantifiable performance goals and measures and use this performance information to assess progress towards the goals and effectiveness of the layered approach to securing vessels and maritime cargo on an ongoing basis. DHS concurred with our recommendations.

View [GAO-25-106953](#). For more information, contact Heather MacLeod at (202) 512-8777 or [macleodh@gao.gov](mailto:macleodh@gao.gov).

January 2025

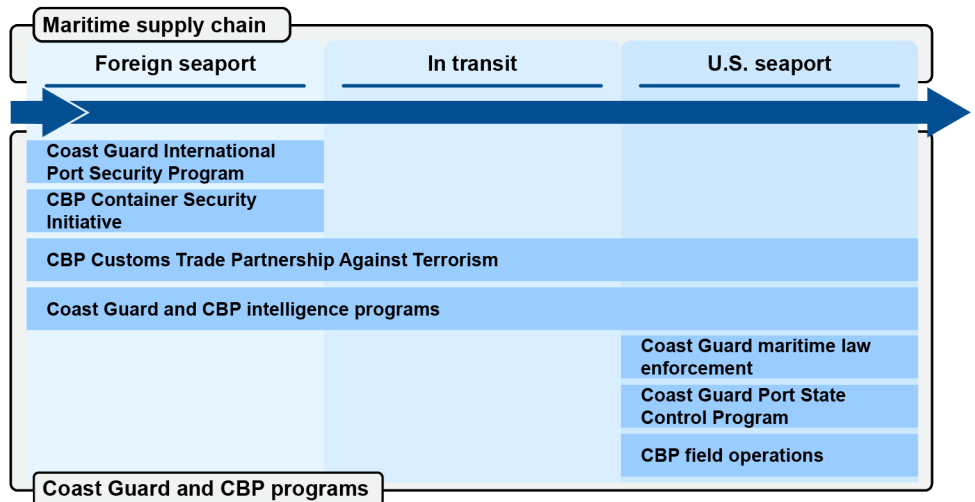
# MARITIME CARGO SECURITY

## Additional Efforts Needed to Assess the Effectiveness of DHS's Approach

### What GAO Found

The Department of Homeland Security (DHS) uses a layered maritime security approach to identify potentially high-risk, U.S.-bound vessels and cargo shipments. Within DHS, the U.S. Coast Guard and U.S. Customs and Border Protection (CBP) are the lead agencies that manage programs that screen, target, and examine these vessels and shipments. Both agencies conduct these activities before vessels and cargo depart foreign seaports, in transit, and upon their arrival at U.S. seaports. For example, both agencies have intelligence programs to screen and target these vessels and cargo across the supply chain.

**U.S. Coast Guard and U.S. Customs and Border Protection (CBP) Programs to Secure U.S.-Bound Vessels and Cargo in the Maritime Supply Chain**



Source: GAO analysis of Department of Homeland Security information. | GAO-25-106953

GAO found that Coast Guard and CBP at the 16 selected field units generally followed five selected leading practices for interagency collaboration in their efforts to secure U.S.-bound vessels and maritime cargo from national security risks. For example, officials from all selected field units we interviewed reported leveraging resources and information to collaborate with their counterpart. Specifically, Coast Guard officials at one location said they leveraged the staff of other federal agencies, such as CBP, to help with vessel boardings due to their own staffing challenges.

GAO also found that DHS had not fully assessed the effectiveness of its approach for securing vessels and maritime cargo. The Coast Guard and Transportation Systems Sector partners—including federal agencies, state, local, and tribal governments, and nongovernmental organizations—identified a strategic goal with activities relevant to securing vessels and maritime cargo. However, they have not developed objective, measurable, and quantifiable performance goals and performance measures to fully assess progress towards this goal. Doing so would better position the agency and its partners to regularly use performance information to assess the effectiveness of their approach and help inform decisions, such as determining how to best allocate resources.

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**Abbreviations**

CBP	U.S. Customs and Border Protection
CSI	Container Security Initiative
DHS	U.S. Department of Homeland Security
ICE	U.S. Immigration and Customs Enforcement
NTC	National Targeting Center
ReCoM	Regional Coordinating Mechanism

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January 21, 2025

The Honorable Ted Cruz  
Chairman  
The Honorable Maria Cantwell  
Ranking Member  
Committee on Commerce, Science, and Transportation  
United States Senate

The Honorable Sam Graves  
Chairman  
The Honorable Rick Larsen  
Ranking Member  
Committee on Transportation and Infrastructure  
House of Representatives

The U.S. economy depends on the quick and efficient flow of millions of tons of cargo each day throughout the global supply chain. According to the Department of Transportation, the majority of U.S. cargo arrives by ocean vessel, and in 2023, ocean vessels continued to transport the majority of U.S.-international cargo, valued at \$2.1 trillion.<sup>1</sup>

However, U.S.-bound vessels and maritime cargo shipments can present significant security concerns, as individuals and criminal organizations have exploited vulnerabilities in the maritime supply chain by using cargo to smuggle narcotics, stowaways, and other contraband.<sup>2</sup> For example, U.S. Customs and Border Protection (CBP) and the U.S. Coast Guard seized 20,000 pounds of dried khat, a controlled substance, from a shipping container at the Port of Seattle in 2022. Further, there is a risk that terrorists could use maritime cargo shipments to transport a weapon of mass destruction or other terrorist contraband into the U.S. Such criminal activity or terrorist attacks using maritime cargo shipments could

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<sup>1</sup>“The Role of the Nation’s Ports in the U.S. Supply Chain,” U.S. Department of Transportation, Bureau of Transportation Statistics, accessed January 8, 2025, <https://data.bts.gov/stories/s/A-Port-s-Role/ht8q-b5eg>.

<sup>2</sup>According to the U.S. Coast Guard, a stowaway is a person coming to the U.S. secretly on an airplane or vessel without legal status for admission. For the purpose of this report, “contraband” is defined as any property that is unlawful to produce or possess, as well as goods exported from or imported into a nation against its laws.

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cause disruptions to the supply chain and limit global economic growth and productivity.

The Department of Homeland Security (DHS) is the primary department responsible for securing U.S.-bound vessels and maritime cargo, and for protecting the U.S. from vessel-related national security risks or threats posed, such as risks posed by terrorism or weapons of mass destruction. We have reported previously on various aspects of these DHS programs and efforts related to maritime security—including targeting and examining high-risk cargo and vessels—such as Coast Guard’s International Port Security Program and CBP’s Container Security Initiative and Customs Trade Partnership Against Terrorism.<sup>3</sup> We have made recommendations to enhance the effectiveness of these programs, as discussed throughout the report.

The James M. Inhofe National Defense Authorization Act for Fiscal Year 2023 includes a provision for GAO to assess federal efforts to secure U.S.-bound vessels and maritime cargo from national security related risks.<sup>4</sup> This report addresses:

1. How DHS secures U.S.-bound vessels and maritime cargo from supply chain risks;
2. The extent to which DHS used selected leading collaboration practices when securing U.S.-bound vessels and maritime cargo; and
3. The extent to which DHS has assessed the effectiveness of its approach for securing U.S.-bound vessels and maritime cargo.

To address our first objective, we focused on Coast Guard and CBP programs for securing U.S.-bound vessels and maritime cargo from risks from their departure from a foreign seaport to their arrival at a U.S.

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<sup>3</sup>GAO, *Coast Guard: Opportunities Exist to Strengthen Foreign Port Security Assessment Program*, [GAO-23-105385](#) (Washington, D.C.: Apr. 18, 2023); GAO, *Maritime Cargo Security: CBP’s Efforts to Address the Impacts of COVID-19*, [GAO-22-105803](#) (Washington, D.C.: Sept. 14, 2022); GAO, *Maritime Cargo Security: CBP Should Provide Additional Guidance for Certain Non-Containerized Cargo Inspections*, [GAO-22-104210](#) (Washington, D.C.: Jun. 22, 2022); and GAO, *Supply Chain Security: Providing Guidance and Resolving Data Problems Could Improve Management of the Customs-Trade Partnership Against Terrorism Program*, [GAO-17-84](#) (Washington, D.C.: Feb. 8, 2017).

<sup>4</sup>James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, div. K, tit. CXV, subtit. C, § 11521, 136 Stat. 2395, 4143 (2022).

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seaport.<sup>5</sup> Specifically, we reviewed Coast Guard and CBP policies, procedures, and other relevant documentation to determine the relevant authorities, and program roles and responsibilities for each identified program or office. These documents included Coast Guard's *Marine Safety: Port State Control* (2021) and CBP's *Seaport Cargo Processing Guidelines* (2022).<sup>6</sup> We also conducted interviews with relevant DHS officials about the primary headquarters and field programs and offices with responsibility for securing vessels and maritime cargo from supply chain risks.

To address our second objective, we assessed DHS's collaborative efforts against five of eight leading practices for collaboration: (1) define common outcomes; (2) clarify roles and responsibilities; (3) include relevant participants; (4) leverage resources and information; and (5) develop and update written guidance and agreements.<sup>7</sup> Specifically, we reviewed DHS, Coast Guard, and CBP documentation to identify the use of selected leading collaboration practices in written guidance. This documentation included national- and field-level policies and procedures—such as local Regional Coordinating Mechanism (ReCoM)

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<sup>5</sup>We defined "supply chain risks" as threats of terrorism, weapons of mass destruction, and contraband such as drugs and weapons. We chose this definition based on our review of the relevant national and department-level strategy documents and interviewing relevant U.S. Department of Homeland Security (DHS) officials on their objectives for securing vessels and maritime cargo. We did not include DHS activities to secure storage facilities at U.S. seaports after maritime cargo is cleared for entry, or the transfer of maritime cargo to other modes of transportation to locations within the continental U.S.

<sup>6</sup>See U.S. Coast Guard, *Commandant Instruction 16000.73: Marine Safety Manual: Port State Control* (Washington, D.C., Sept. 20, 2021) and U.S. Customs and Border Protection (CBP), *Seaport Cargo Processing Guidelines Version 1.2* (Washington, D.C., Nov. 2022).

<sup>7</sup>See GAO, *Government Performance Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023). We selected five of the eight leading collaboration practices because they were the most relevant to DHS's Coast Guard and CBP activities to secure U.S.-bound vessels and maritime cargo. We excluded three practices from our assessment of DHS's collaborative efforts: (1) ensure accountability; (2) bridge organizational cultures; and (3) identify and sustain leadership.

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charters.<sup>8</sup> These documents can include information that describes methods and mechanisms for interagency collaboration and information sharing, or that is designed to guide or set goals for collaboration on securing vessels and maritime cargo.<sup>9</sup>

Further, to assess DHS's collaborative efforts, we interviewed or received written responses from Coast Guard and CBP officials representing 16 field units located across a non-generalizable selection of eight U.S. seaports.<sup>10</sup> We selected the sample of eight U.S. seaports where Coast Guard and CBP field units are located and that included varying volumes of cargo and a diversity of geographic regions—the Great Lakes, Pacific and Atlantic Oceans, and Gulf of Mexico—to obtain a range of perspectives.

While the information we obtained from Coast Guard and CBP officials at selected U.S. seaports are not generalizable to all seaports and field units, it provided valuable insights into their policies, procedures, and collaboration practices. We conducted site visits to the Port of Los Angeles-Long Beach, California; and the Port of Miami, Florida to tour Coast Guard and CBP facilities, observe their operations, and interview relevant officials regarding their collaboration. We chose these seaport locations due to their large port size and high volume of cargo, among other factors. We also visited CBP's National Targeting Center in Sterling, Virginia to tour the facility and observe Coast Guard and CBP joint cargo- and vessel-targeting operations using various systems, including CBP's

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<sup>8</sup>DHS established Regional Coordinating Mechanisms (ReCoM) as an interagency collaborative mechanism in the field to implement DHS's *Maritime Operations Coordination Plan*—a national-level policy—which we discuss later in the report. In addition to the lead agencies, Coast Guard and CBP, other stakeholders that participate in ReCoMs come from all levels of government, including the Federal Bureau of Investigation; the Drug Enforcement Administration; and state, local, and tribal law enforcement agencies. According to the Coast Guard, ReCoMs are to exist in every Coast Guard sector's geographic area of responsibility. ReCoMs can facilitate the collaboration between the Coast Guard and CBP, and other federal and non-federal agencies.

<sup>9</sup>In our prior work, we have described several interagency collaborative mechanisms that federal agencies have used to structure and organize interagency work. Such mechanisms include, for example, interagency groups led by component and program-level staff (such as task forces, working groups, councils, and committees); interagency agreements and memorandums of understanding; and the joint development of policies, procedures, and programs. See [GAO-23-105520](#).

<sup>10</sup>For the purpose of this report, field units are Coast Guard sectors and CBP field operations located at or near U.S. ports of entry.



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Automated Targeting System.<sup>11</sup> Additional information on this analysis and the seaport locations of officials we interviewed is included in appendix I.

To address our third objective, we reviewed federal government-wide strategy documents, such as the 2015 *Transportation Systems Sector-Specific Plan* and the 2018 *Transportation Systems Sector Activities Progress Report*.<sup>12</sup> We did so to determine DHS and the Coast Guard's goals to support the transportation sector and efforts to assess its approach for securing U.S.-bound vessels and maritime cargo. To determine the Coast Guard's progress on achieving the goals laid out in this plan and any associated performance measures, we interviewed officials from Coast Guard's Office of Port and Facility Compliance, the office responsible for ensuring the goals are completed.

To determine the extent to which the Coast Guard has assessed DHS's approach for securing U.S.-bound vessels and maritime cargo, we compared the actions the Coast Guard took against the goals laid out in the 2015 sector-specific plan.<sup>13</sup> We also assessed the extent to which the Coast Guard's efforts to assess the effectiveness of its layered maritime security approach against leading practices for performance management, including selected key attributes for such goals and measures identified in our prior work.<sup>14</sup> We further evaluated the Coast Guard's efforts for assessing its layered approach using the National

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<sup>11</sup>The Automated Targeting System is a decision support tool that compares traveler and cargo information, among other things, against law enforcement, intelligence, and other enforcement data using risk-based scenarios and assessments.

<sup>12</sup>See Department of Homeland Security and Department of Transportation, *Transportation Systems Sector-Specific Plan* (2015); and *Transportation Systems Sector Activities Progress Report* (2018).

<sup>13</sup>We evaluated the Coast Guard's efforts because under the *Transportation Systems Sector-Specific Plan*, the Coast Guard is the DHS agency designated with primary responsibility for the safety, security, and environmental protection in support of the maritime domain. See Department of Homeland Security and Department of Transportation, *Transportation Systems Sector-Specific Plan* (2015).

<sup>14</sup>GAO, *Evidence-Based Policymaking: Practices to Help Manage and Assess the Results of Federal Efforts*, [GAO-23-105460](#) (Washington, D.C.: July 12, 2023).

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Infrastructure Protection Plan's *Critical Infrastructure Risk Management Framework*.<sup>15</sup>

We conducted this performance audit from July 2023 to January 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

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### Coast Guard and CBP Roles and Responsibilities

Within DHS, the Coast Guard and CBP are the primary components responsible for securing U.S.-bound vessels and maritime cargo. For example:

- The Coast Guard has primary responsibility for safeguarding the maritime interests of the U.S. The Coast Guard is also responsible for safety and security of vessels and maritime facilities. In this capacity, among other efforts, the Coast Guard conducts port facility and commercial vessel inspections, leads the coordination of maritime information sharing efforts, and promotes domain awareness in the maritime environment.
- CBP is the lead federal agency responsible for ensuring cargo security and reducing the vulnerabilities associated with the global supply chain. This involves identifying and mitigating risks associated with maritime cargo shipments that pose a threat to national security, such as weapons of mass destruction and contraband (such as illegal weapons and narcotics). See figure 1 for an example of a vessel carrying containerized cargo.

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<sup>15</sup>The 2013 *National Infrastructure Protection Plan* includes the *Critical Infrastructure Risk Management Framework*, which describes the activities that critical infrastructure partners are to collaboratively undertake to inform decision-making on actions intended to address identified infrastructure and related risk. The *Framework* includes the following activities: (1) set goals and objectives; (2) identify infrastructure; (3) assess and analyze risks; (4) implement risk management activities; and (5) measure effectiveness. See DHS, *National Infrastructure Protection Plan 2013: Partnering for Critical Infrastructure Security and Resilience* (December 2013) and *Supplemental Tool: Executing A Critical Infrastructure Risk Management Approach* (Dec. 17, 2020).

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**Figure 1: Commercial Vessel Carrying Containerized Cargo**



Source: U.S. Customs and Border Protection photo by Jerry Glaser. | GAO-25-106953

Further, the President issued Presidential Policy Directive 21 in 2013, which established national policy on critical infrastructure security and resilience for the nation's 16 critical infrastructure sectors and outlined federal roles and responsibilities for protecting them.<sup>16</sup> This directive

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<sup>16</sup>The White House, *Presidential Policy Directive 21: Critical Infrastructure Security and Resilience* (Washington, D.C.: Feb. 12, 2013).

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assigned roles and responsibilities to DHS as one of two departments responsible for the Transportation Systems Sector.<sup>17</sup>

To implement the directive, DHS issued a revised 2013 *National Infrastructure Protection Plan* (the National Plan) and, later, the 2015 *Transportation Systems Sector-Specific Plan* to guide and integrate efforts to secure and strengthen the resilience of transportation infrastructure.<sup>18</sup> The sector-specific plan tailors the strategic guidance provided in the National Plan to the unique operating conditions and risk landscape of the nation's varied transportation systems. Accordingly, the sector-specific plan comprises activities in support of four subsectors: aviation, maritime, surface, and postal and shipping. Within DHS, the Coast Guard is assigned as the executive agency responsible for carrying out this work for maritime subsector activities.<sup>19</sup>

The 2015 *Transportation Systems Sector-Specific Plan* also describes how the sector contributes to the overall security and resilience of the nation's critical infrastructure and lays out goals to do so.<sup>20</sup> This includes one strategic goal related to maritime security and supply chain activities: enhance the all-hazards preparedness and resilience of the global transportation system to safeguard U.S. national interests. To achieve this goal, the sector-specific plan lays out five maritime activities.<sup>21</sup>

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<sup>17</sup>Presidential Policy Directive 21 also designated responsibility for the Transportation Sector to the Department of Transportation.

<sup>18</sup>Presidential Policy Directive 21 required that DHS update the *National Infrastructure Protection Plan*. Accordingly, DHS issued the 2013 *National Infrastructure Protection Plan* to guide the national effort to manage risk to the nation's critical infrastructure. See DHS, *National Infrastructure Protection Plan 2013: Partnering for Critical Infrastructure Security and Resilience* (Dec. 2013). The 2015 *Transportation Systems Sector-Specific Plan*'s purpose is, among other things, to describe how the transportation systems sector contributes to the overall security and resilience of the nation's critical infrastructure, as set forth in Presidential Policy Directive 21. The 2015 *Transportation Systems Sector-Specific Plan* is not, however, required to be issued under Presidential Policy Directive 21.

<sup>19</sup>Within DHS, the Transportation Security Administration is also assigned as the executive agency responsible for the aviation, surface, and postal and shipping subsectors. In addition, according to the *Transportation Systems Sector Specific Plan*, CBP contributes to the transportation security and resilience mission.

<sup>20</sup>Department of Homeland Security and the Department of Transportation, *Transportation Systems Sector-Specific Plan* (2015).

<sup>21</sup>Department of Homeland Security and the Department of Transportation, *Transportation Systems Sector Activities Progress Report* (2018). The sector-specific plan also includes non-maritime activities for achieving this goal.

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## Vessel and Maritime Cargo Information Required to be Submitted to DHS Prior to Arrival

Coast Guard regulations require that, no later than 96 hours prior to a vessel's entry into the U.S., the vessel's owner or agent is required to submit a vessel Notice of Arrival to the Coast Guard's National Vessel Movement Center. This notice is to contain information that the Coast Guard states it can use to determine whether a vessel is of interest or possibly high-risk.<sup>22</sup> For example, each Notice of Arrival must include the name of the vessel, the country the vessel is registered to, the names and dates of the last five foreign ports or places the vessel visited, and a general description of cargo.<sup>23</sup> Additionally, the notice must indicate if the vessel is carrying certain dangerous cargo—for example, explosives or poisonous materials—and the name and amount of such cargo carried, among other things.<sup>24</sup>

In addition, CBP regulations generally require that the vessel's owner or agent submit electronic crew and passenger arrival lists to assess their risk no later than 96 hours prior to a vessel's entry into the U.S.<sup>25</sup> Each arrival list must contain information such as the individual's full name, date of birth, citizenship, status on board the vessel, and the vessel name and flag country. The Coast Guard transmits the Notice of Arrival information to CBP's Advance Passenger Information System, which provides information about vessels on the required fields to be used in the arrival lists. Further, pursuant to the Trade Act of 2002, CBP must receive advance electronic cargo information 24 hours prior to the vessel loading

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<sup>22</sup>The Ports and Waterways Safety Act of 1972 enables the Secretary of DHS to require the installation of specified navigation and communications equipment on vessels that operate within a vessel traffic service, and other measures to protect navigation and the marine environment. Pub. L. No. 92-340, tit. I, § 101, 86 Stat. 424, 425 (1972). Generally, if the vessel's voyage time is 96 hours or more, the carrier must submit a Notice of Arrival at least 96 hours before arriving at the port or place of destination. If the vessel's voyage is less than 96 hours, the carrier must submit a Notice of Arrival before departure but at least 24 hours before arriving at the port or place of destination. 33 C.F.R. § 160.212(a)(4).

<sup>23</sup>33 C.F.R. § 160.206(a).

<sup>24</sup>33 C.F.R. §§ 160.202, 160.206(a). Explosives include Division 1.1 or 1.2 explosives as defined in 49 C.F.R. § 173.50 and poisonous materials include liquid material that has a primary or subsidiary classification of Division 6.1 "poisonous material" as listed in 49 C.F.R. § 172.101 that is also a "material poisonous by inhalation," as defined in 49 C.F.R. § 171.8 and that is in a bulk packaging, or that is in a quantity in excess of 20 metric tons per vessel when not in bulk packaging.

<sup>25</sup>19 C.F.R. § 4.7b.

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in a foreign port.<sup>26</sup> According to CBP, this data enables CBP to perform automated targeting and risk analysis of cargo arriving in the U.S.

In January 2009, CBP implemented the Importer Security Filing and Additional Carrier Requirements, generally referred to as the Importer Security Filing rule.<sup>27</sup> CBP generally requires importers and vessel carriers to electronically submit advance cargo information, such as the country of origin, to CBP no later than 24 hours before cargo is loaded onto U.S.-bound vessels at foreign ports. Importer Security Filing importers are responsible for submitting the Importer Security Filing and required data elements for this filing differ depending on the cargo's destination.<sup>28</sup> According to CBP, collection of the additional cargo information is intended to improve CBP's ability to identify high-risk shipments and prevent the transportation of terrorist weapons and other contraband into the U.S.

Additionally, for vessels transporting containerized cargo to the United States, CBP requires vessel carriers to submit vessel stow plans and container status messages if the carrier creates or collects a container

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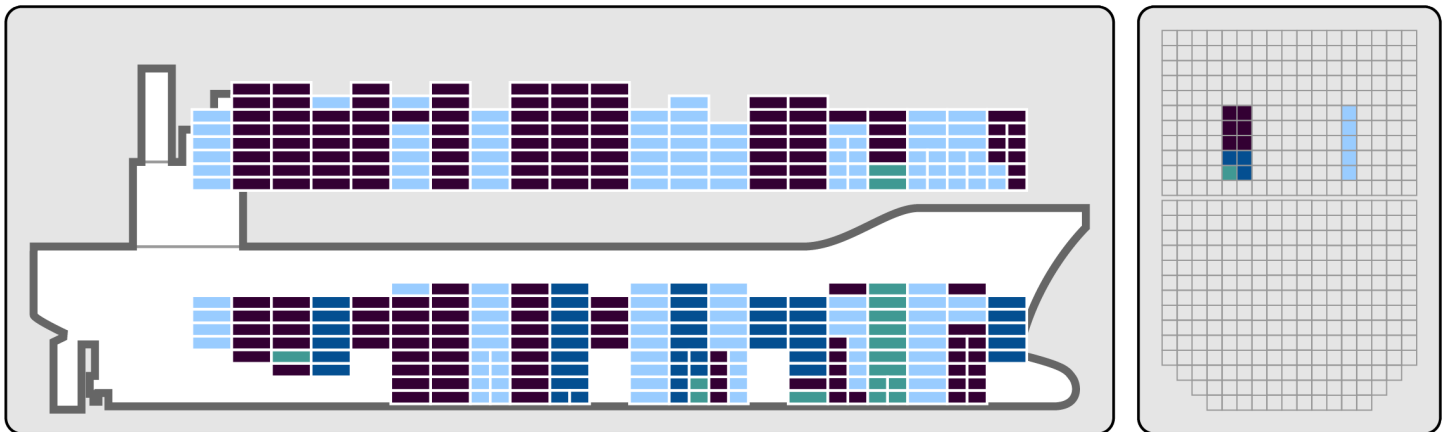
<sup>26</sup>Pub. L. No. 107-210, div. A, tit. III, subtit. A, ch. 4, §§ 343(a), (b), (c), 116 Stat. 933, 981-83 (2002) (codified as amended at 19 U.S.C. §§ 1415, 1431a). According to CBP, prior to the Trade Act of 2002, vessels were required to present an Inward Cargo Declaration paper form as part of the vessel's manifest. According to CBP, the Inward Cargo Declaration is typically the information from the carrier's bill of lading. The Trade Act of 2002 and implementing regulations require that the data on the Inward Cargo Declaration be submitted to CBP electronically 24-hours prior to loading in the foreign port (with some exceptions). 19 U.S.C. § 1431a; 19 C.F.R. § 4.7 et seq.

<sup>27</sup>The Importer Security Filing rule was implemented in response to a requirement in the Security and Accountability for Every Port Act of 2006 that DHS collect additional information to identify high-risk cargo shipments for inspection. Pub. L. No. 109-347, tit. II, subtit. A, § 203(a), 120 Stat. 1884, 1904. The rule requires that Importer Security Filing importers (the party causing the goods to arrive within the limits of a port in the United States by vessel) and vessel carriers (who physically transport goods from foreign ports to ports in the United States) submit additional cargo information, such as country of origin, to CBP before the cargo is loaded onto U.S.-bound vessels. Importer Security Filing and Additional Carrier Requirements, 73 Fed. Reg. 71,730 (Nov. 25, 2008) (codified in scattered sections of 19 C.F.R.).

<sup>28</sup>19 C.F.R. § 149.2(a). For cargo bound for the U.S. as the final destination, the rule requires Importer Security Filing importers to submit an Importer Security Filing to CBP 24 hours prior to vessel loading. For cargo transiting the U.S., but for which the U.S. is not the final destination, the rule requires importers to submit an Importer Security Filing to CBP prior to loading. 19 C.F.R. § 149.2(b). Additionally, importer security filings must include different elements depending on the final destination of the cargo. 19 C.F.R. § 149.3.

status message in its equipment tracking system report that event.<sup>29</sup> Specifically, carriers create container status messages for events that are required to be reported, such as loading and discharging of vessels; as well as the status of containers, such as if they are empty or full.<sup>30</sup> A carrier is to submit container status messages to CBP no later than 24 hours after the message is entered into the carrier's equipment tracking system.<sup>31</sup> Similarly, generally no later than 48 hours after departure from the last foreign port, vessel carriers transporting containers are to submit vessel stow plans to CBP.<sup>32</sup> Vessel stow plans are required to include the vessel's name, the vessel operator, voyage number, the container operator, the stow position of each container on a vessel, hazardous material code (if applicable), and the port of discharge.<sup>33</sup> See figure 2 for an example of a vessel stow plan.

**Figure 2: Example of a Vessel Stow Plan**



Source: U.S. Customs and Border Protection (CBP); GAO illustration. | GAO-25-106953

Note: The image above is a portion of information available through the vessel stow plan. The left portion of this figure provides CBP with a general idea of the total number, location, and origin of the containers (colors designate containers loaded at the same ports). The right portion of this figure represents a cross section of the vessel and shows the layout of containers for each level on the vessel. Other information accessible to CBP through the vessel stow plan includes, for example, last foreign port and departure date, destination port, and number of containers. CBP can also view

<sup>29</sup>19 C.F.R. §§ 4.7c, 4.7d.

<sup>30</sup>19 C.F.R. § 4.7d(b).

<sup>31</sup>19 C.F.R. § 4.7d(c).

<sup>32</sup>19 C.F.R. § 4.7c(a).

<sup>33</sup>19 C.F.R. § 4.7c(b), (c).

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information about containers individually or in groups, as well as information about all unmanifested containers or containers loaded at the same foreign port.

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## Leading Collaboration Practices

In prior work, we have identified eight leading practices to help agencies collaborate and coordinate their efforts.<sup>34</sup> For example, we found that effective interagency collaboration (among two or more federal entities) benefits from practices such as defining common outcomes and having clear roles and responsibilities. We also identified key considerations for collaborating entities to use when incorporating the practices. For example, to define common outcomes, participants in a collaboration can consider developing short- and long-term goals or outcomes. We selected five of the eight leading collaboration practices as relevant to the Coast Guard and CBP activities to secure U.S.-bound vessels and maritime cargo (see table 1).

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**Table 1: Selected Leading Collaboration Practices and Examples of Key Considerations Identified in Prior GAO Work**

Leading practice	Examples of key considerations
Define common outcomes	<ul style="list-style-type: none"><li>• Have the crosscutting challenges or opportunities been identified?</li><li>• Have the short- and long-term outcomes been clearly defined?</li></ul>
Clarify roles and responsibilities	<ul style="list-style-type: none"><li>• Have the roles and responsibilities of the participants been clarified?</li></ul>
Include relevant participants	<ul style="list-style-type: none"><li>• Have all relevant participants been included?</li><li>• Do the participants have the appropriate knowledge, skills, and abilities to contribute?</li></ul>
Leverage resources and information	<ul style="list-style-type: none"><li>• How will the collaboration be resourced through staffing?</li><li>• Are methods, tools, or technologies to share relevant data and information being used?</li></ul>
Develop and update written guidance and agreements	<ul style="list-style-type: none"><li>• If appropriate, have agreements regarding the collaboration been documented?</li><li>• Have ways to continually update or monitor written agreements been developed?</li></ul>

Source: GAO. | GAO-25-106953

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<sup>34</sup>[GAO-23-105520](#).



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## DHS Secures Vessels and Cargo from Risks at Multiple Points in the Maritime Supply Chain

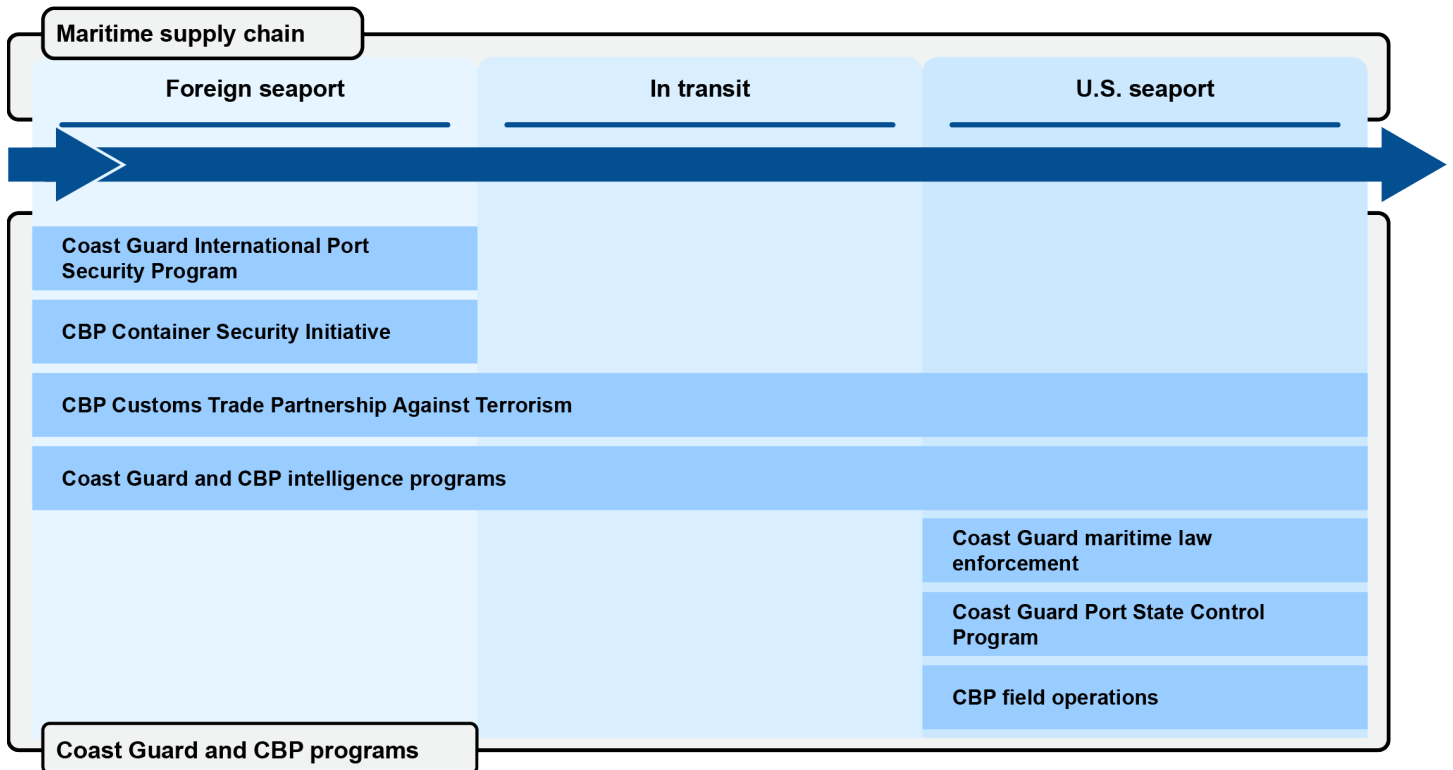
DHS uses a layered approach of interrelated programs to help secure the maritime supply chain without disrupting the flow of commerce into the U.S. Specifically, the Coast Guard and CBP manage several programs that screen, target, and examine potentially high-risk vessels and cargo at multiple points in the supply chain, such as before they depart foreign seaports, during their transit, and upon their arrival at U.S. seaports.

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## Coast Guard and CBP Programs Assess Risks of Terrorism Before Vessels and Cargo Depart Foreign Seaports

Through voluntary programs at foreign seaports, Coast Guard and CBP personnel assess seaport and vessel security measures and prescreen high-risk cargo to mitigate the risk of criminal activity and terrorism before vessels and maritime cargo depart from foreign seaports to arrive at U.S. seaports. Figure 3 shows key DHS security programs at various points in the maritime supply chain.

**Figure 3: U.S. Coast Guard and U.S. Customs and Border Protection (CBP) Programs to Secure U.S.-Bound Vessels and Cargo in the Maritime Supply Chain**



Program	Description
<b>Coast Guard International Port Security Program</b>	The program aims to reduce the risk of terrorism to the U.S. by visiting foreign seaports to assess the effectiveness of antiterrorism measures, among other efforts.
<b>CBP Container Security Initiative</b>	The program aims to identify and examine U.S.-bound maritime container shipments at foreign seaports that pose a security risk before loading such containers in a foreign port.
<b>CBP Customs Trade Partnership Against Terrorism</b>	The program is a voluntary government-private sector program which works to strengthen and improve the overall security of the international supply chain and U.S. border security, and to facilitate the movement of secure cargo through the international supply chain, by providing benefits to participants meeting or exceeding the program requirements.
<b>Coast Guard and CBP intelligence programs</b>	Intelligence programs, such as the National Targeting Center, screen information about U.S.-bound vessels and maritime cargo at multiple points to target any that are high risk and could pose threats.
<b>Coast Guard maritime law enforcement</b>	Maritime law enforcement personnel at U.S. seaports may board vessels to examine cargo, documentation, and persons on board to ensure vessels maintain an appropriate security posture while underway and in port.
<b>Coast Guard Port State Control Program</b>	The program examines foreign-flagged vessels operating in U.S. waters to verify compliance with applicable regulations to remove substandard vessels.
<b>CBP field operations</b>	Field operations personnel inspect maritime cargo at U.S. seaports and secure arriving vessels by boarding every vessel from foreign seaports to inspect the persons on board and search for potential stowaways and contraband.

Source: GAO analysis of Department of Homeland Security information. | GAO-25-106953

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**Coast Guard International Port Security Program.** The International Port Security Program aims to reduce the risk of terrorism to the U.S. and its marine transportation system by providing the Coast Guard with awareness of the global port security environment. The program carries out this work through efforts such as assessing the effectiveness of antiterrorism measures in foreign seaports against international standards and identifying ways for foreign governments and seaport facility operators to more fully implement these standards and measures.<sup>35</sup> The Coast Guard uses this program as an early warning indicator on potential risks posed to U.S. seaports by vessels transiting from foreign seaports that are not implementing effective antiterrorism measures.<sup>36</sup>

To assess the effectiveness of antiterrorism measures, program personnel visit the foreign seaports of countries that voluntarily participate in the program to observe physical security conditions, such as the seaport's control of cargo and other material aboard vessels arriving at facilities.<sup>37</sup> Based on these observations, program officials determine whether the foreign seaport meets international standards, document their findings, and share this information with foreign government officials,

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<sup>35</sup>The International Port Security program uses the International Ship and Port Facility Code, developed by the United Nations' International Maritime Organization, as the benchmark by which it measures the effectiveness of a country's antiterrorism measures in a port. The International Ship and Port Facility Code is an international framework of standards to guide cooperation among countries, and shipping and port industries to address security threats and incidents. The framework, in place since July 2004, provides the primary security requirements and guidance applicable to ships engaged in international voyages and port facilities serving such ships. It establishes respective roles and responsibilities for countries and port facility operators, requires countries to have plans in place for addressing security risks, and aims to help ensure that adequate maritime security measures are in place. For more information on the International Ship and Port Facility Code, see International Maritime Organization, *International Ship & Port Facility Security Code and SOLAS Amendments 2002* (London: 2003).

<sup>36</sup>The International Port Security Program was established by the Maritime Transportation Security Act of 2002. The act requires DHS to assess the effectiveness of antiterrorism measures at ports from which foreign vessels depart to the U.S., among other things. Pub. L. No. 107-295, tit. I, § 102(a), 116 Stat. 1064, 2079 (2002) (pertinent portion codified at 46 U.S.C. § 70108). The Secretary delegated this responsibility to the Coast Guard, which initiated the International Port Security program in 2004 in response.

<sup>37</sup>According to the International Maritime Organization, a key element of cargo control is determining whether a system is in place to ensure that cargo and ships' stores being delivered to the port facility are authorized and do not contain contraband.

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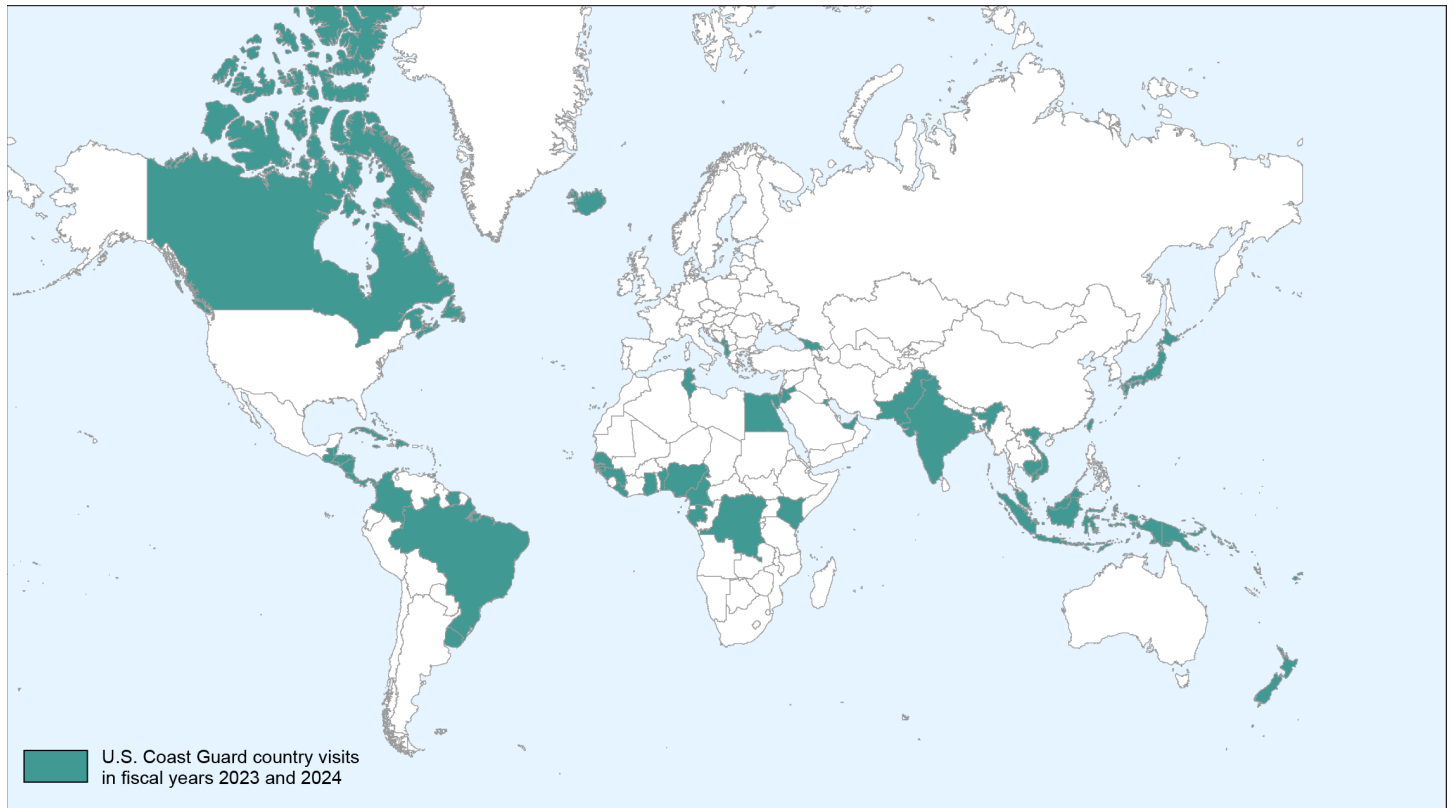
DHS components, including CBP, and the public.<sup>38</sup> The Coast Guard reported that during fiscal years 2023 and 2024, Coast Guard program personnel visited 74 of its 123 maritime trading partners, as shown in figure 4 below.<sup>39</sup>

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<sup>38</sup>According to a Coast Guard work instruction with guidance on the International Port Security Program, after the Coast Guard notifies the countries they determined were not effectively implementing antiterrorism measures, it normally publishes a public notice, known as its Port Security Advisory, through the U.S. Federal Register and on its public website.

<sup>39</sup>Our prior work on the International Port Security Program found that Coast Guard program personnel visited 123 of its 164 locations between fiscal years 2014 and 2022. See [GAO-23-105385](#). The Coast Guard is to reassess foreign seaports and assess antiterrorism measures on a triennial basis. 46 U.S.C. § 70108(d). In addition, the Coast Guard has an agreement with the governing body for 22 European Union nations. The Coast Guard recognizes inspections completed by each nation's governing body in the same manner as it recognizes its own country assessment. See 46 U.S.C. § 70108(f) (permitting the Secretary to recognize an assessment conducted by other entities as an assessment conducted by the Secretary).

**Figure 4: U.S. Coast Guard International Port Security Program Country Visits in Fiscal Years 2023 and 2024**



- |                                  |                                  |                   |               |                      |                         |                         |                          |
|----------------------------------|----------------------------------|-------------------|---------------|----------------------|-------------------------|-------------------------|--------------------------|
| 1. Albania                       | 10. Cambodia                     | 19. Egypt         | 30. Honduras  | 41. Kuwait           | 51. Pakistan            | 60. Solomon Islands     | 69. Tunisia              |
| 2. Bahamas                       | 11. Cameroon                     | 20. El Salvador   | 31. Hong Kong | 42. Liberia          | 52. Palau               | 70. Tuvalu              | 71. United Arab Emirates |
| 3. Bahrain                       | 12. Canada                       | 21. Fiji          | 32. Iceland   | 43. Malaysia         | 53. Panama              | 61. St. Kitts & Nevis   | 72. Uruguay              |
| 4. Barbados                      | 13. Colombia                     | 22. Gabon         | 33. India     | 44. Marshall Islands | 54. Papua New Guinea    | 62. St. Lucia           | 73. Vanuatu              |
| 5. Belize                        | 14. Comoros                      | 23. Gambia        | 34. Indonesia | 45. Micronesia       | 55. Sint Maarten        | 63. St. Vincent         | 74. Vietnam              |
| 6. Benin                         | 15. Costa Rica                   | 24. Georgia       | 35. Israel    | 46. Monaco           | 56. Samoa               | 64. Suriname            |                          |
| 7. Bonaire, St. Eustacius & Saba | 16. Cuba                         | 25. Ghana         | 36. Jamaica   | 47. Montenegro       | 57. Sao Tome & Principe | 65. Taiwan              |                          |
| 8. Brazil                        | 17. Democratic Republic of Congo | 26. Grenada       | 37. Japan     | 48. New Zealand      | 58. Senegal             | 66. Timor Leste         |                          |
| 9. Brunei                        | 18. Dominican Republic           | 27. Guatemala     | 38. Jordan    | 49. Nicaragua        | 59. Seychelles          | 67. Tonga               |                          |
|                                  |                                  | 28. Guinea        | 39. Kenya     | 50. Nigeria          |                         | 68. Trinidad and Tobago |                          |
|                                  |                                  | 29. Guinea Bissau | 40. Kiribati  |                      |                         |                         |                          |

Source: U.S. Coast Guard. | GAO-25-106953

Note: According to the Coast Guard, Coast Guard personnel visited Costa Rica in fiscal year 2024 and Nigeria in both fiscal years 2023 and 2024. In total, Coast Guard program personnel conducted 78 country visits in fiscal years 2023 and 2024.

In 2023, we found that while the Coast Guard documents its assessment results in various reports, it did not share its results with CBP, which CBP needs to review to carry out its work for its Container Security Initiative

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(CSI) program.<sup>40</sup> Specifically, CBP's CSI program must assess the Coast Guard's foreign port assessment findings, among other factors, when designating foreign seaports to participate in its efforts to examine high-risk maritime containers before their departure to the U.S., which is further discussed below. In April 2023, we recommended that the program share its findings with CBP and other relevant agencies with a vested interest. In June 2023, the Coast Guard shared its findings with CBP and established procedures to ensure it provided future findings to CBP and other relevant agencies that fully addressed this recommendation. By disseminating its findings to CBP and other relevant agencies, the Coast Guard program can better support CBP's requirement to assess its foreign port assessments and support its policy for a whole of government approach for securing the U.S. supply chain.

Based on the program's findings, the Coast Guard can set conditions of U.S. entry for vessels departing from those foreign seaports that the program determined are not implementing effective antiterrorism measures, such as requiring that each access point to the vessel is guarded while the vessel is in those foreign seaports. The program also can provide capacity building and technical assistance to foreign seaport officials to help improve seaport security and maritime governance. According to Coast Guard program guidance, at U.S. seaports, Coast Guard personnel are to consider International Port Security Program findings when screening incoming vessels and take certain actions, such as verifying that vessel operators implemented security measures at selected foreign seaports (discussed later in this report under the Coast Guard Port State Control Program).

**CBP Container Security Initiative (CSI) program.** According to CBP, the CSI program aims to identify and examine U.S.-bound maritime container shipments that pose a security risk. CBP established CSI in January 2002 to address concerns (after the attacks on September 11, 2001) that terrorists could smuggle weapons of mass destruction or other contraband inside U.S.-bound containers.<sup>41</sup> As of September 2024, 61 seaports participated in the CSI program, as shown in figure 5 below.

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<sup>40</sup>See [GAO-23-105385](#).

<sup>41</sup>The Security and Accountability For Every Port Act of 2006 codified the CSI program. Pub. L. No. 109-347, tit. II, subtit. A, § 205, 120 Stat. 1884, 1906 (pertinent portion codified at 6 U.S.C. § 945).

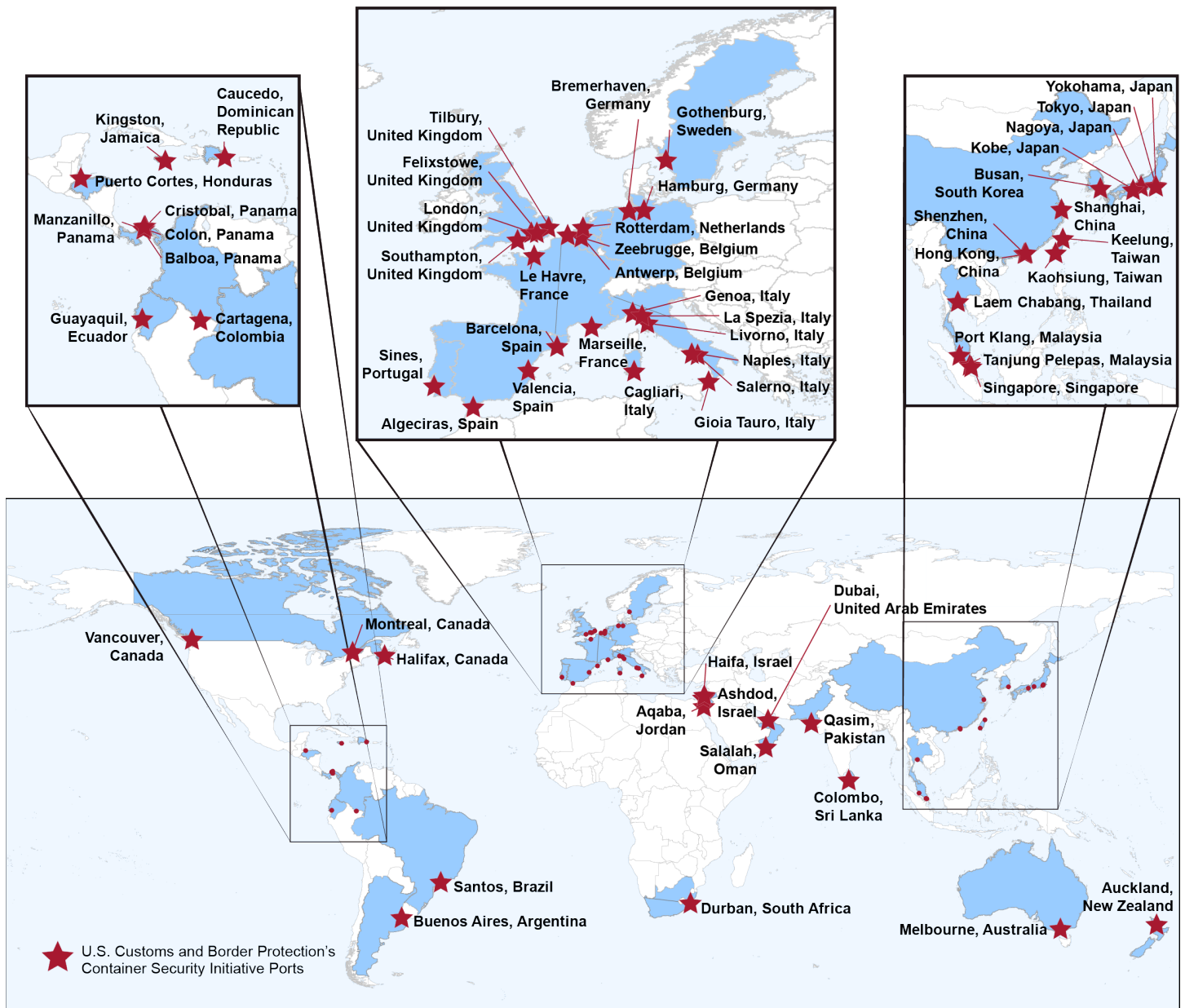
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According to our prior work, these seaports collectively accounted for 72 percent of the cargo shipped to the U.S. by volume, as of April 2022.<sup>42</sup>

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<sup>42</sup>See [GAO-22-105803](#).

**Figure 5: U.S. Customs and Border Protection's Container Security Initiative Ports as of September 2024**



Source: U.S. Customs and Border Protection. | GAO-25-106953

CSI personnel target and examine high-risk, U.S.-bound containers as early as possible in their movement through the global supply chain. To



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do so, the CSI program stations personnel at participating foreign seaports to work with their counterparts to target and examine such containers before they are loaded onto vessels at their respective seaports.<sup>43</sup> CSI personnel work with the host country's government to mitigate high-risk container shipments, which may include resolving discrepancies in shipment information and requesting their foreign counterparts to scan cargo containers' contents with radiation detection or imaging equipment. If these scans indicate the potential presence of weapons of mass destruction or other contraband, CSI personnel are to request that the host government physically examine the shipment. If the host government declines, CSI personnel can issue a "do not load" order to prevent the shipment from being loaded onto a U.S.-bound vessel. Alternatively, they can flag the shipment for further examination upon arrival at a U.S. seaport, which is discussed in more detail below.

**CBP Customs Trade Partnership Against Terrorism Program.** In November 2001, CBP established the Customs Trade Partnership Against Terrorism Program as part of its efforts to facilitate the free flow of goods, while ensuring that the cargo containers do not pose a threat of terrorism.<sup>44</sup> This voluntary, incentives-based program works with private entities in the global trade community, such as importers and carriers, to improve their security practices and the security practices of their business partners. In 2017, we reported that the program faced challenges in meeting its security validation responsibilities because of problems with the functionality of the program's data management system and limitations in the agency's ability to determine the extent to which

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<sup>43</sup>Our prior work on the CSI showed that the program has matured but opportunities exist for improvement. Specifically, in 2016, we reported that relationships with host governments have improved over time, leading to increased information sharing between governments and a bolstering of host government customs and port security practices. See GAO, *Maritime Security: Progress and Challenges in Implementing Maritime Cargo Security Programs*, [GAO-16-790T](#) (Washington, D.C.: Jul. 7, 2016).

<sup>44</sup>The Security and Accountability For Every Port Act of 2006 established a statutory framework for the Customs Trade Partnership Against Terrorism program. In addition to formally establishing this program as a voluntary government-private sector partnership to strengthen and improve the overall security of the global supply chain, the act codified existing membership processes for the program and added new components, such as time frames for certifying, validating, and revalidating members' security practices. The act requires CBP to review the minimum security requirements of the Customs Trade Partnership Against Terrorism program at least once a year. According to program officials, CBP can add new security requirements as needed. Pub. L. No. 109-347, tit. II, subtit. B, §§ 211-23, 120 Stat. at 1909-15 (codified at 6 U.S.C. §§ 961-73). GAO has ongoing work related to the Customs Trade Partnership Against Terrorism program, as mandated in the CTPAT Pilot Program Act of 2023. CTPAT Pilot Program Act of 2023, Pub. L. No. 118-98, § 4, 138 Stat. 1575, 1576-77 (2024).

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program members were receiving benefits because of data problems.<sup>45</sup> We recommended, among other things, that CBP develop standardized guidance for field offices regarding the tracking of information on security validations and CBP has taken actions to fully close these recommendations.

Entities that join the program commit to improving the security of their supply chains, such as through implementing proper container seal practices, and agree to provide CBP with information on their specific supply chain security measures.<sup>46</sup> In addition, the entities agree to allow CBP to validate, among other things, that their security practices meet or exceed CBP's minimum security requirements. In return for their participation in the program, members receive benefits such as fewer CBP examinations at U.S. ports.<sup>47</sup>

CBP personnel from the Customs Trade Partnership Against Terrorism program determine applicants' eligibility by reviewing their compliance with customs laws and any history of violations, among other things, and certify members if their security measures meet minimum standards. Within 1 year of certification, the program is to validate these security measures through a site visit to the member and, if the member is an importer, at least one foreign supply chain partner's site. Once members are validated, the program is to review their eligibility status, among other things, on an annual basis and revalidate their security measures every 4 years.

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<sup>45</sup>GAO-17-84.

<sup>46</sup>According to CBP documentation, CBP has established Customs Trade Partnership Against Terrorism security requirements for different industry partners, such as importers and sea carriers. Security requirements include several focus areas, such as transportation security and people and physical security. According to CBP documentation, the sealing of containers to attain continuous seal integrity is an element of a secure supply chain. Seal security includes having a comprehensive written seal policy that addresses all aspects of seal security, such as using the correct seals per Customs Trade Partnership Against Terrorism requirements.

<sup>47</sup>CBP, *CTPAT Trade Compliance Handbook V4* (Washington, D.C.: Sept. 2023). According to CBP's 2023 program report, the Customs Trade Partnership Against Terrorism program had over 10,000 member companies from over 100 countries, and program partners imported 51 percent of cargo. CBP, *CTPAT 2023 Impact Report* (Washington, D.C.: June 2024).

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## Coast Guard and CBP Intelligence Programs Screen and Target Vessels and Cargo En Route to U.S. Seaports

Coast Guard and CBP intelligence programs located across the U.S. screen information about U.S.-bound vessels and maritime cargo while they are en route to identify and target any that are high risk and could pose threats.<sup>48</sup> When appropriate, these programs alert seaport personnel to take further action.

**CBP National Targeting Center (NTC).** Established in 2001 and based in Sterling, Virginia, the NTC is staffed by CBP and Coast Guard personnel, among other federal agencies.<sup>49</sup> The center conducts risk-based screening of maritime cargo, vessels, and people attempting to enter the U.S.<sup>50</sup> Within the NTC, the cargo division focuses on screening and targeting efforts to identify potentially high-risk cargo shipments. For example, Coast Guard personnel in the cargo division told us they often find unmanifested container shipments and alert U.S. port personnel for further action because they are unaware of the content inside those containers. While the focus of personnel at foreign and U.S. seaports is on assessing shipments transiting from or to their respective seaports, personnel in the cargo division assess shipments for security risks from a national perspective, and alert seaport personnel for further action. For example, if personnel in the cargo division have specific intelligence regarding an attempt to smuggle a weapon of mass destruction in a container, the division can identify whether any shipments destined for the U.S. match the intelligence information, regardless of the seaport of arrival.

Cargo division personnel also serve as a resource for other targeting units stationed at foreign and U.S. seaports due to the NTC's access to research tools, such as classified databases, that may not be available to field personnel. For example, CSI personnel stationed at the NTC's cargo division support CSI teams stationed at foreign seaports by researching leads provided by foreign-based CSI teams and conducting remote

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<sup>48</sup>When discussing CBP's intelligence programs or activities, we are referring to law enforcement intelligence or information related to CBP's mission.

<sup>49</sup>The National Targeting Center (NTC) was originally established in 2001, and later statutorily established in 2016. Pub. L. No. 114-125, tit. VIII, subtit. A, § 802, 130 Stat. 122, 302 (2016) (pertinent portion codified at 6 U.S.C. § 211(g)(4)(A)).

<sup>50</sup>Coast Guard personnel at the NTC are part of the agency's Coastwatch program under the Intelligence Coordination Center Command. According to an agreement between the Coast Guard and CBP regarding the integration of maritime screening operations at the NTC, Coastwatch personnel are permanently assigned to the center's cargo division and are responsible for screening vessels and cargo for hazardous and dangerous material, among other things.

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targeting for high volume ports.<sup>51</sup> Similarly, Coast Guard personnel at U.S. seaports can request additional intelligence information from NTC personnel for screening operations, such as background checks of persons on board a vessel.

**Coast Guard Maritime Intelligence Fusion Centers—Atlantic and Pacific.** The Coast Guard’s Maritime Intelligence Fusion Centers are in two locations: the Atlantic center in Dam Neck, Virginia and the Pacific center in Alameda, California. These centers serve as hubs for maritime intelligence sharing and analysis at the operational and tactical level in their area of operation. According to the Coast Guard, the centers are responsible for screening U.S.-bound vessels from foreign seaports, tracking vessels from all over the world, and providing actionable intelligence to Coast Guard commanders in the field.

**Domestic intelligence and targeting units.** At or near U.S. seaports, Coast Guard and CBP personnel within intelligence and targeting units review advance information related to U.S.-bound vessels, maritime cargo, and persons on board a vessel destined for seaports within their respective region to identify potential security risks. For example, Coast Guard personnel advise unit commanders on all intelligence information related to potential risks to integrate them into Coast Guard missions, such as vessel boardings and inspections. Similarly, CBP personnel target potentially high-risk cargo shipments and flag them for further examination at a U.S. seaport. According to CBP officials, CBP targeting personnel at U.S. seaports are intended to augment the NTC’s assessments as an added layer of security screening to ensure vessel and cargo risks are not missed.

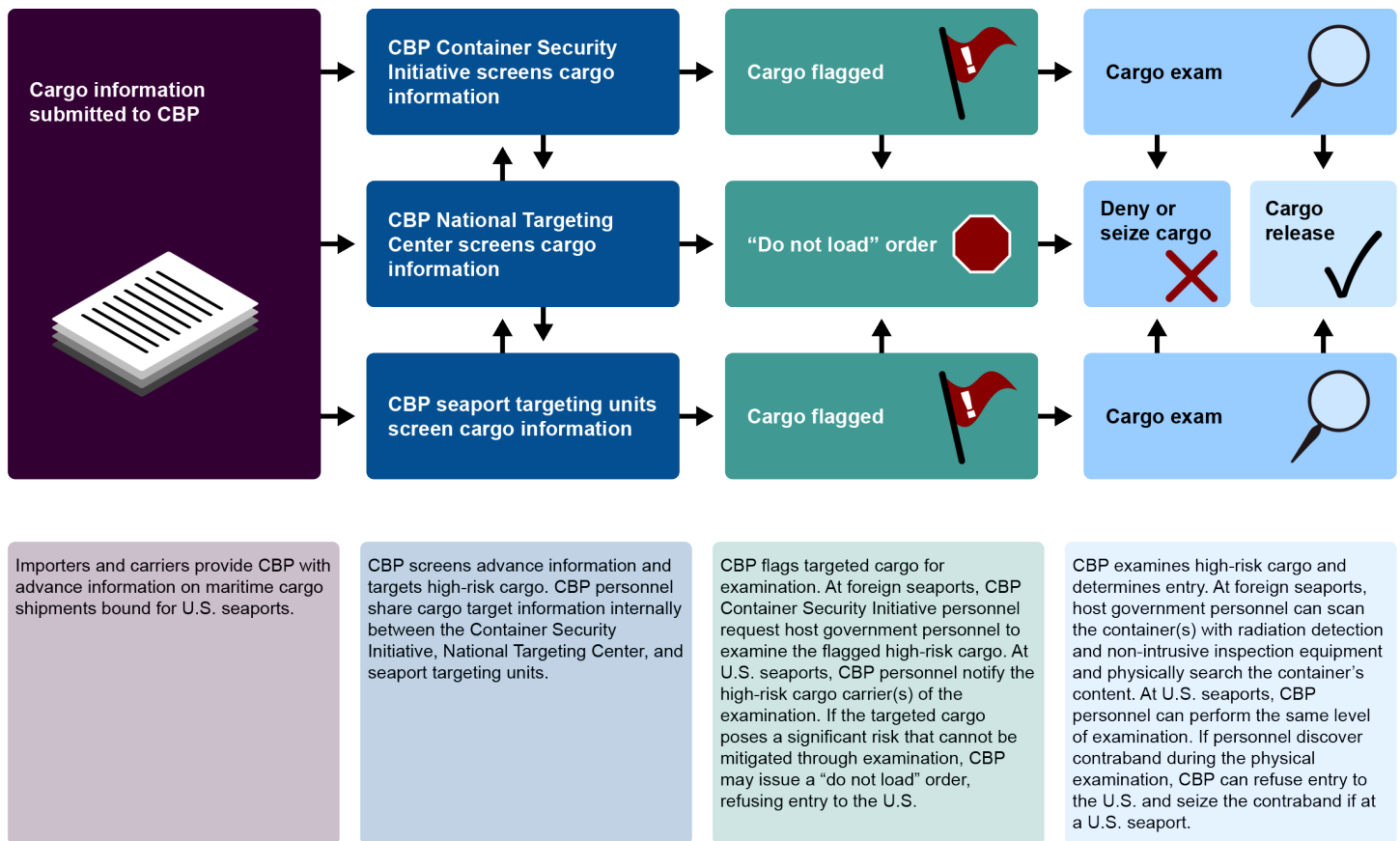
Additionally, CBP personnel may target a shipment with risks that cannot be mitigated through other means, including examining the shipment at a CSI port overseas or obtaining additional information about the shipment from importers and carriers. In such cases, personnel may seek approval for a “do not load” order from the NTC’s cargo division before a shipment is loaded onto a U.S.-bound vessel. Once a shipment is loaded onto a vessel, personnel continue to review shipment data and use other sources, such as public records. Using these data and information, CBP personnel will assess whether the shipment could pose a risk and, as appropriate, may target the shipment for examination upon arrival at a

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<sup>51</sup>Our prior work in 2022 on CBP programs and any impacts of COVID-19 found that CBP personnel at NTC’s cargo division remotely targeted U.S.-bound vessels and maritime cargo at 11 CSI ports in seven countries. See [GAO-22-105803](#).

U.S. seaport. See figure 6 for an overview of the key steps CBP personnel may take to screen and target high-risk maritime cargo bound for the U.S.

**Figure 6: Key Steps in U.S. Customs and Border Protection’s (CBP) Process for Screening and Targeting High-Risk Cargo Throughout the Maritime Supply Chain**



Source: GAO analysis of Department of Homeland Security information; GAO icons. | GAO-25-106953

### Coast Guard and CBP Inspect Vessels and Maritime Cargo for Security Risks Upon Arrival at U.S. Seaports

At U.S. seaports, the Coast Guard and CBP may board targeted high-risk vessels or further examine high-risk maritime cargo at a seaport and offshore to (1) address security breaches, (2) examine documentation of cargo and persons onboard, and (3) examine vessels and cargo for safety concerns.

**Coast Guard maritime law enforcement.** At U.S. seaports, Coast Guard armed law enforcement personnel, known as boarding teams, may board

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arriving and departing vessels of interest to examine cargo, documentation, and persons on board, and to deter acts of terrorism and transportation security incidents.<sup>52</sup> According to Coast Guard officials, the purpose of security exams is to ensure vessels maintain an appropriate security posture while in transit and in port to prevent security threats to the vessel and port, among other things. For example, according to the Coast Guard's *Maritime Law Enforcement Manual*, boarding teams are to investigate any law enforcement intelligence related to the vessel and crew and may include a search for contraband and stowaways onboard.<sup>53</sup> Coast Guard maritime law enforcement personnel can also escort certain high-risk vessels and enforce security zones to mitigate risk.<sup>54</sup> The Coast Guard uses classified policy and procedures to target vessels for security boardings.

**Coast Guard Port State Control Program.** After the Coast Guard's boarding teams inspect vessels to ensure no security threat exists, the Port State Control Program examines arriving and departing foreign-flagged vessels operating in U.S. waters. According to Coast Guard policy, the examinations are intended to verify that these vessels comply with applicable international conventions, as well as federal statutes and regulations.<sup>55</sup> The goal of the program is to remove substandard vessels

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<sup>52</sup>The Maritime Transportation Security Act of 2002 defined a transportation security incident as a security incident resulting in a significant loss of life, environmental damage, transportation system disruption, or economic disruption in a particular area. Pub. L. No. 107-295, tit. 1, § 102(a), 116 Stat. at 20681 (pertinent portion codified as amended at 46 U.S.C. § 70101(7)).

<sup>53</sup>See U.S. Coast Guard, *Commandant Instruction M16247.1H* (Washington, D.C.: Nov. 20, 2020).

<sup>54</sup>The Coast Guard's maritime law enforcement personnel escort high-risk vessels to protect against potential external attacks. The Coast Guard establishes security zones, which are designated areas of land, water, or land and water, to prevent damage or injury to any vessel or waterfront facility; to safeguard ports, harbors, territories, or waters of the U.S.; or to secure the observance of the rights and obligations of the U.S.

<sup>55</sup>According to the Coast Guard policy, Port State Control is the process by which a nation exercises its authority over foreign vessels in waters subject to its jurisdiction. See U.S. Coast Guard, *Commandant Instruction 16000.73* (Washington, D.C., Sept. 20, 2021). The U.S. exercises its authority through the Coast Guard's Port State Control Program. This authority comes from several sources, both domestic and international. Certain foreign vessels operating in U.S. waters are subject to inspection under Title 46 U.S.C. Chapter 33. Generally, reciprocity is accorded to vessels of countries that are parties to the International Convention for the Safety of Life at Sea (SOLAS). 46 U.S.C. § 3303. In addition, certain provisions of U.S. pollution prevention and navigation safety regulations (33 C.F.R. Parts 155-156 and Part 164, respectively) apply to certain foreign vessels operating in U.S. waters.

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from U.S. waters to reduce deaths and injuries, loss of or damage to property or the marine environment, and disruptions to maritime commerce.<sup>56</sup> At U.S. seaports, program personnel conduct exams by doing a walk-through and visual assessment of a vessel's certificates and operating systems, such as navigation equipment, among other things.<sup>57</sup>

Additionally, according to the policy, Coast Guard personnel are to also verify that, if conditions of entry have been imposed, incoming vessels have implemented additional security measures at selected foreign seaports determined by the International Port Security Program to not have effective antiterrorism measures. Coast Guard personnel are to verify that vessels took appropriate action while in those selected foreign seaports by interviewing vessel crew and reviewing documentation, such as security company contracts or payment receipts, according to the policy. As of October 2024, Coast Guard personnel at U.S. seaports are to verify conditions of entry of U.S.-bound vessels departing from 21 countries, as shown in figure 7.<sup>58</sup>

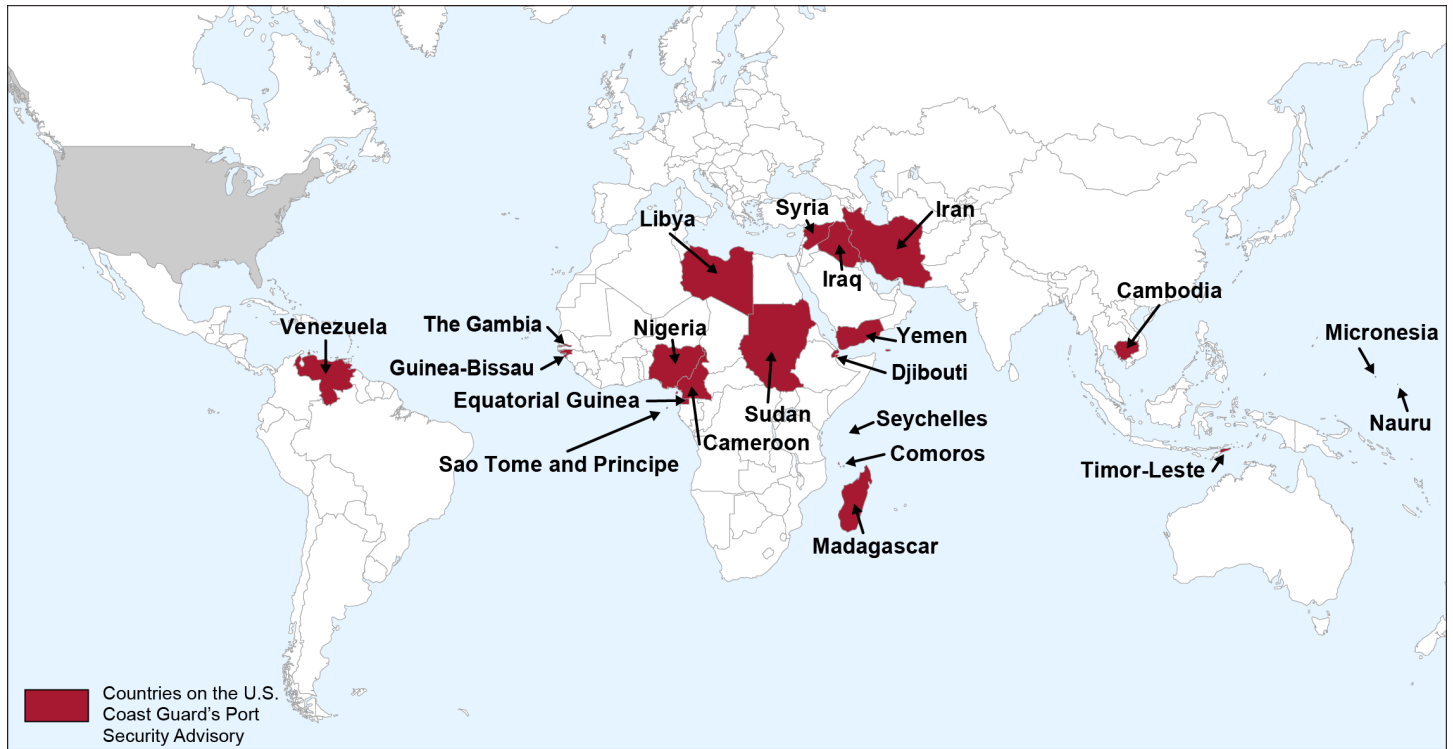
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<sup>56</sup>According to Coast Guard policy, personnel are to deem a vessel substandard if the hull, machinery, or equipment—such as lifesaving, firefighting and pollution prevention equipment—is substantially below the standards required by U.S. laws or international conventions. Under the policy, Coast Guard personnel are to detain the vessel, until corrective measures are taken, if the presence of any of these factors could endanger the ship, persons on board, or present an unreasonable risk to the marine environment. See U.S. Coast Guard, *Commandant Instruction 16000.73* (Washington, D.C.: Sept. 20, 2021).

<sup>57</sup>According to a 2020 Coast Guard work instruction with guidance for the Port State Control Program, the agency updated its port state control exam procedures, creating three exam types that differ in scope. See U.S. Coast Guard Office of Commercial Vessel Compliance Mission Management System Work Instruction, CVC-WI-021(1) (Jan. 13, 2020). According to the guidance, the previous exam types mandated exam locations, among other requirements, whereas the updated policy gives Coast Guard leadership the discretion to decide exam location, frequency, and scope. The updated exam process prioritizes Coast Guard resources to conduct exams on vessels that pose the greatest risk, while reducing the frequency and scope of port state control exams on vessels with low identified risk, according to the guidance. In its 2023 Port State Control Program annual report, the Coast Guard reported conducting 8,278 of these exams throughout the U.S., which were 428 fewer than in 2022. In 2023, vessels made 81,854 port calls to the U.S. See U.S. Coast Guard, *Port State Control in the United States 2023 Annual Report* (Washington, D.C.: 2023).

<sup>58</sup>According to the Coast Guard's Port Security Advisory, the public list of countries with ports not maintaining effective antiterrorism measures, Coast Guard personnel are to verify conditions of entry of U.S.-bound vessels that visited affected countries during their last five port calls. Countries on the Port Security Advisory may have exceptions of ports that are not affected by conditions of entry.

**Figure 7: Countries with Ports Not Maintaining Effective Antiterrorism Measures as Identified by the U.S. Coast Guard, as of October 2024**



Source: U.S. Coast Guard. | GAO-25-106953

If personnel find discrepancies or security breaches on board an incoming vessel, the Coast Guard can take actions to safeguard the U.S. seaport, personnel, and the environment. According to the Coast Guard's policy, the agency can take the following actions:

- Denial of entry/expulsion. The Coast Guard uses a denial of entry/expulsion when allowing a vessel to enter or remain in U.S. waters would create an unacceptable level of risk, or an immediate threat to the seaport, personnel, or the environment.
- Captain of the Port order. The Coast Guard uses these orders as a tool to protect the safety and security of the seaport. Under certain conditions, the Captain of the Port of a Coast Guard sector may issue this order to direct a variety of actions, including controlling the vessel's movement as it enters or departs a seaport. The Captain of the Port may also use this order to expel a vessel out of a seaport.



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- Customs hold. Certain vessels intending to depart the U.S. for a foreign seaport must obtain a clearance from CBP.<sup>59</sup> If the Coast Guard suspects that a vessel has violated certain U.S. safety and pollution laws, according to the Coast Guard's policy, the Coast Guard may request that CBP deny or withhold the required clearance from the vessel until the vessel's responsible party takes corrective actions.

**CBP field operations.** Under CBP's Office of Field Operations, field personnel are responsible for inspecting maritime cargo at 126 U.S. seaports. CBP has 20 field offices that oversee all U.S. port of entry operations within their designated areas of responsibility, which include 18 field offices responsible for cargo security operations at U.S. seaports. CBP Port Directors are responsible for managing the day-to-day cargo security operations for U.S. seaports within their geographic area of responsibility, which includes implementing national policy and maintaining the seaports' cargo inspection program.

According to CBP officials, CBP field personnel at U.S. seaports secure arriving vessels by boarding every vessel from foreign seaports to inspect the persons on board and search for potential stowaways and contraband. For example, personnel search the vessel itself for contraband, including underwater inspections for parasitic devices. CBP field personnel may also search cargo on board, if needed, verify vessel certificates, and compliance with other CBP trade laws and regulations for declaration and safe keeping of merchandise on board, according to CBP officials.

CBP field personnel examine the arriving cargo flagged by their targeting teams to address potential threats.<sup>60</sup> Specifically, personnel at U.S. seaports that are part of CBP's Anti-Terrorism Contraband Enforcement Teams may examine the cargo by, among other methods, scanning it with non-intrusive inspection equipment, such as mobile x-ray machines (see fig. 8). CBP personnel review the scans to detect anomalies that could indicate the presence of weapons of mass destruction or contraband.

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<sup>59</sup>46 U.S.C. § 60105.

<sup>60</sup>CBP defines examination as physical intrusion, or observational non-intrusive review of documents or cargo to detect the presence of unmanifested, misdeclared (inaccurate), restricted, or prohibited items. Unlike for non-containerized cargo, federal law requires, at minimum, radiation scanning for all containerized cargo entering the U.S. through the 22 ports through which the greatest volume of containers enter the U.S. by vessel. 6 U.S.C. § 921(a). CBP policy provides that all containerized cargo must be scanned for radiation.

**Figure 8: A Shipping Container Passing Through U.S. Customs and Border Protection’s Non-Intrusive Inspection Screening Equipment at the Long Beach Container Terminal Within the Port of Long Beach**



Source: GAO. | GAO-25-106953

According to CBP guidance and officials, if CBP personnel detect an anomaly, the cargo or container may be transferred to a centralized examination station or similar location for further examination. At that point, CBP personnel will remove and physically examine the cargo or container’s contents. If personnel discover contraband during the physical

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examination, CBP seizes it; otherwise, CBP releases the cargo back into the flow of commerce.

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## DHS Generally Followed Selected Leading Collaboration Practices at U.S. Seaports

The Coast Guard and CBP at nearly all field units included in our review generally followed five selected leading collaboration practices identified in prior GAO work in their efforts to secure U.S.-bound vessels and maritime cargo from national security risks.<sup>61</sup> The five practices are (1) define common outcomes, (2) clarify roles and responsibilities, (3) include relevant participants, (4) leverage resources and information, and (5) develop and update written guidance and agreements.<sup>62</sup> While we have organized our findings on the selected leading collaboration practices individually in the following sections, they are interrelated and reinforce each other, and are not sequenced in any particular order.

**Define common outcomes.** According to expert views and our prior work, having a shared purpose can provide people with a reason to participate in the collaborative process.<sup>63</sup> Officials we interviewed from nearly all field units (15 of 16) identified common outcomes or missions with their counterpart.<sup>64</sup> For example, CBP officials from one field unit acknowledged that both the Coast Guard and CBP have roles in protecting the nation from terrorism, intercepting drug smuggling, and looking for stowaways on vessels. Coast Guard officials from another field unit said that both the Coast Guard and CBP share the mission of seaport safety and security. At another field unit, the Coast Guard established a group with other federal, state, and local law enforcement agencies—including CBP—to achieve the common goal of promoting safety and security, in addition to protecting life and property in the region.

**Clarify roles and responsibilities.** Clarifying roles and responsibilities between agencies can be achieved by identifying and leveraging authorities, among other things.<sup>65</sup> Additionally, defined and agreed-upon roles and responsibilities can often help to overcome barriers when

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<sup>61</sup>[GAO-23-105520](#).

<sup>62</sup>See appendix I for more information on our selection of five leading collaboration practices identified in prior GAO work.

<sup>63</sup>[GAO-23-105520](#) and GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, [GAO-12-1022](#) (Washington, D.C.: Sept. 26, 2012).

<sup>64</sup>For this report, we refer to Coast Guard and CBP as counterparts at U.S. seaports.

<sup>65</sup>[GAO-23-105520](#).

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working across agency boundaries. Officials we interviewed from all 16 field units reported having clarified roles and responsibilities related to collaboration with their counterpart. For example, CBP officials at one field unit said CBP and the Coast Guard have overlapping authorities related to the enforcement of the Jones Act; CBP has provided training to the Coast Guard to help educate personnel, especially new ones, on CBP's related roles and responsibilities.<sup>66</sup> Coast Guard officials from a field unit at the same location confirmed that CBP provided training related to the Jones Act and said more training would be helpful to further understand overlapping roles and responsibilities with CBP.

CBP officials at another field unit stated that there is a clear line of delineation of responsibilities between where the Coast Guard and CBP have jurisdiction over a vessel, which allows them to coordinate their activities. For example, officials stated that CBP has lead responsibilities when a vessel is dockside, while the Coast Guard has lead responsibilities when a vessel is enroute to a pier in the water. Coast Guard officials at another field unit also noted that they were knowledgeable of the delineation of responsibilities between both agencies, understanding that the Coast Guard focuses on regulating the vessel, the crew, and hazardous cargo, while CBP focuses on screening and managing all other cargo.

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<sup>66</sup>Federal policy has long acknowledged the importance of the U.S. maritime industry to national defense, including the industrial base, as well as the nation's homeland security and economic security. This policy includes that it is in the interest of the United States national security that the United States merchant marine, both ships and mariners, serve as a naval auxiliary in times of war or national emergency. To help support the U.S. maritime industry, the law commonly referred to as the Jones Act requires that merchandise being transported by water between U.S. points be shipped aboard vessels that are U.S.-built, U.S. citizen owned, and registered in the U.S. Pub. L. No. 66-261, ch. 250, §§ 1, 27, 41 Stat. 988, 999 (1920) (Jones Act codified as amended at 46 U.S.C. § 55102); 46 U.S.C. § 50101 (consolidating earlier authorities).

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**Example of Including Relevant Participants in the Field**

The Department of Homeland Security (DHS) established Joint Intelligence Operations Coordination Centers across the U.S. to coordinate operations between DHS components in the field. These centers can include staff from multiple DHS components. For example:

In 2020, DHS established a Joint Intelligence Operations Coordination Center in South Florida to act as a unified control center in the area and coordinate operations between participating agencies. This center is staffed by personnel from multiple DHS components, including U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations, and the U.S. Coast Guard.

According to officials we spoke with from this center, personnel hold calls twice a week with local partners and partners across Florida, all internal to DHS, to discuss upcoming operations or requests for information. Included in the calls are U.S. seaport-level personnel across Florida from the Coast Guard, CBP, and ICE Homeland Security Investigations, among others.

Source: Department of Homeland Security. | GAO-25-106953

**Include relevant participants.** Collaborative efforts that include relevant participants provide a diverse group of perspectives.<sup>67</sup> This allows the group to consider an issue from all sides, which is important when solving complex problems. Officials we interviewed from nearly all field units (15 of 16) reported identifying and including relevant participants to collaborate with their counterpart. For example, Coast Guard and CBP officials at 12 field units said relevant participants are involved in their interagency collaborative mechanisms. At one location, Coast Guard officials said the relevant entities they work with are involved in their Regional Coordinating Mechanism (ReCoM)—a DHS interagency collaborative mechanism for resources and information sharing in the maritime domain. The ReCoM includes personnel representing CBP and U.S. Immigration and Customs Enforcement (ICE) Homeland Security Investigations, a DHS federal law enforcement agency responsible for conducting federal criminal investigations into the illegal movement of people, contraband, and weapons, among other responsibilities. Additionally, CBP officials at another location described a special unit that includes personnel from the Coast Guard, the Federal Bureau of Investigation, ICE Homeland Security Investigations, state police, and other federal agencies who work together to analyze vessel and cargo threats.

**Leverage resources and information.** To successfully address crosscutting challenges or opportunities, collaborating agencies must successfully leverage available staffing, funding, and technological resources.<sup>68</sup> Because crosscutting challenges and opportunities require coordination among multiple agencies, in many cases, no single organization or individual has the authority, resources, or skills necessary to address them. Officials we interviewed from all 16 field units reported leveraging resources and information to collaborate with their counterpart. For example, CBP officials at one location said they asked the Coast Guard to use its authority to order a vessel to keep out of their area's waters due to security concerns, since CBP does not

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<sup>67</sup>[GAO-23-105520](#).

<sup>68</sup>[GAO-23-105520](#).

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### Examples of Leveraging Resources and Information in the Field

According to Department of Homeland Security operations reports, U.S. Coast Guard and U.S. Customs and Border Protection (CBP) officials have worked together on joint operations in the field. These agencies leverage each other's resources, such as staff. Examples of this include:

- *Night Crawler Operation.* Led by Coast Guard Sector Miami in 2024, this joint effort—conducted with CBP and U.S. Immigration and Customs Enforcement Homeland Security Investigations—resulted in an unannounced operation at four regulated facilities to verify the facilities and vessels there complied with applicable requirements and regulations.
- *Multi Agency Strike Force Operation Oahu.* Led by Coast Guard Sector Honolulu in 2022, this joint effort allowed agencies to work together to inspect and examine containers to better understand each participant's roles, responsibilities, and authorities. Participants included the Coast Guard, CBP, the Federal Bureau of Investigation, the U.S. Department of Agriculture, and local police.



Source: Department of Homeland Security and U.S. Coast Guard photo by Petty Officer 3rd Class Kimberly Reaves. | GAO-25-106953

have this authority.<sup>69</sup> Coast Guard officials at another location stated that they enlisted the help of other agencies—such as CBP and ICE Homeland Security Investigations—for vessel boardings due to their staffing challenges. Officials stated that this acts as a force multiplier and allows the Coast Guard to accomplish more activities and ensure they are conducting operations legally and safely.

In our prior work on leading collaboration practices, we also reported that collaborative efforts can use pilot tests to learn and foster agencies' willingness to participate.<sup>70</sup> By committing a limited number of resources in a smaller-scale approach to the crosscutting challenge or opportunity, groups can identify unanticipated consequences and implementation challenges, or gather information on program effectiveness. In May 2023, Coast Guard and CBP initiated a pilot program to allow selected Coast Guard personnel at seaports within nine Coast Guard sectors to gain direct access to one of CBP's primary systems used to assess U.S.-bound vessels and maritime cargo for national security risks.<sup>71</sup> According to Coast Guard officials responsible for managing the pilot, the goal of the pilot program is to provide Coast Guard personnel at U.S. seaports with additional information for increased situational awareness. The pilot is also intended to create a new vessel screening process, which includes shifting duties within the Coast Guard, among other goals. As of May 2024, Coast Guard officials reported that the effort is still underway. The Coast Guard's pilot program is consistent with the leading collaboration practice's key consideration of having methods, tools, or technologies to share relevant data and information.

**Develop and update written guidance and agreements.** According to expert views, written guidance and agreements can be used as a framework outlining how a collaborative effort operates and how

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<sup>69</sup>As we previously described, according to Coast Guard documents, the Coast Guard's Captain of the Port order is a tool to protect the safety and security of the seaport and the Captain of the Port may issue these orders to expel a vessel out of a seaport, among other uses. See 33 C.F.R. § 160.111.

<sup>70</sup>GAO-23-105520.

<sup>71</sup>The Coast Guard's pilot program aims to provide Coast Guard personnel at selected U.S. seaports with direct access to CBP's Automated Targeting System. As we described earlier in this report, the Automated Targeting System is a decision support tool that compares traveler and cargo information, among other things, against law enforcement, intelligence, and other enforcement data using risk-based scenarios and assessments.

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decisions will be made.<sup>72</sup> Officials from nearly all field units we interviewed (14 of 16) reported developing guidance to collaborate with their counterpart. For example, Coast Guard officials at one location said they developed a charter for their area's ReCoM that identifies the participating agencies and their responsibilities. The agencies include CBP, the Federal Bureau of Investigation, ICE Homeland Security Investigations, the Transportation Security Administration, U.S. Fish and Wildlife Services, and several state agencies. CBP officials at another location said that their collaboration with the Coast Guard is guided by their mutually developed operating guidance for their local area maritime security committee—another DHS interagency collaborative mechanism that includes similar participants in the maritime domain.<sup>73</sup> This local operating guidance contains information on communication methods between CBP, the Coast Guard, and others.<sup>74</sup>

We reviewed ReCoM and area maritime security committee charters that cover a sample of selected field units at four of eight seaports in our review and found they generally incorporated several leading collaboration practices. For example, one area maritime security committee charter we reviewed contained information on common outcomes or objectives, clarified roles and responsibilities, and included relevant participants, among other leading collaboration practices. Similarly, one ReCoM charter we reviewed contained information on relevant participants, common outcomes, and information sharing

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<sup>72</sup>GAO-23-105520 and GAO-12-1022.

<sup>73</sup>The Maritime Transportation Security Act of 2002 established area maritime security advisory committees. Pub. L. No. 107-295, § 102(a), 116 Stat. at 2081 (pertinent provision codified at 46 U.S.C. § 70112(a)). The Coast Guard led the effort to create these maritime security committees in each of their sector's geographic area of responsibility. According to Coast Guard documents, these committees were established to provide a link for contingency planning in the maritime domain, among other things. According to Coast Guard documents, committees enhance communication among port stakeholders and all levels of government to perform critical security missions, including (1) conducting risk assessments of threats, vulnerabilities, and consequences of a transportation security incident; (2) determining mitigation strategies and developing security plans to address and respond to those incidents; and (3) exercising those plans.

<sup>74</sup>Area maritime security committee participants collectively develop local operating guidance known as charters.

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methods. These charters support the components' use of leading collaboration practices.<sup>75</sup>

We have also found that written guidance and agreements can be used to document and monitor the application of interagency collaboration practices and key considerations for implementation related to any collaborative effort.<sup>76</sup> Officials from six of the 14 field units who reported developing written guidance also said they use national-level guidance that DHS has developed to help facilitate collaboration in the field. For example, CBP officials from one location stated that they developed their ReCoM charter based on information in DHS's *Maritime Operations Coordination Plan*—a strategic-level document that establishes cross-component collaboration in the maritime domain to target the threat of transnational terrorist and criminal acts along the coastal borders.<sup>77</sup>

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<sup>75</sup>While officials from nearly all field units we interviewed (14 of 16) reported developing guidance to collaborate with their counterpart, officials from two field units did not. Officials from one field unit said that their collaboration with their counterpart is generally informal and they would have to determine whether written guidance to guide collaboration would be helpful. Officials from the other field unit said that developing written guidance could hinder their flexibility around collaboration.

<sup>76</sup>[GAO-23-105520](#).

<sup>77</sup>DHS developed the *Maritime Operations Coordination Plan* in 2011. The plan directs the Coast Guard, CBP, and U.S. Immigration and Customs Enforcement to integrate planning and coordination of maritime operations that take advantage of the authorities, jurisdiction, responsibilities, capabilities, capacities, and competencies of the components. The plan also provides operational guidance to field components to ensure national objectives are met and exists within the broader context of other DHS strategies. According to the *Maritime Operations Coordination Plan*, all ReCoMs are to develop standard operating procedures that includes information on operations among the components. DHS, *Maritime Operations Coordination Plan* (Washington, D.C.: June 2011). In 2018, DHS was required to update the *Maritime Operations Coordination Plan* in 2019 and biennially thereafter to include certain information. FAA Reauthorization Act of 2018, Pub. L. No. 115-254, div. J, § 1807(a), 132 Stat. 3186, 3536 (codified at 6 U.S.C. § 243). DHS updated the 2011 plan in 2022 and signed it in 2023. See below for our discussion of the updated 2023 *Maritime Operations Coordination Plan*.



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### The Department of Homeland Security (DHS) Updated Its *Maritime Operations Coordination Plan* in 2023

According to DHS officials, the department updated its *Maritime Operations Coordination Plan* in 2023 to improve component collaboration in the field through new guidance and support structures. The updated plan includes requirements for DHS to establish a functioning oversight and support structure to ensure department components in the field—including those within the Coast Guard and U.S. Customs and Border Protection—collaborate to execute the plan’s objectives. The objectives include preventing criminal acts in the maritime domain and obtaining needed resources. Based on our review of DHS documents, the department has taken steps to implement the new requirements. Specifically:

- In August 2024, DHS finalized new guidance for components to establish an oversight and support structure.
- In September 2024, DHS established a new support office responsible for facilitating the connection between oversight groups and the field components and for providing guidance.
- In October 2024, DHS developed steps, including a timeline with milestones, to fully implement the updated plan by March 2025.

DHS officials told us that the intended guidance and structure associated with the updated plan could make component collaboration in the field stronger and provide them needed resources to achieve their mission.

Source: GAO analysis of DHS information. | GAO-25-106953

CBP officials at another location said they use a national-level memorandum of understanding with the Coast Guard to process high-risk crew members on board U.S.-bound vessels.

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## DHS Has Not Fully Assessed the Effectiveness of Its Approach for Securing Vessels and Maritime Cargo

The Coast Guard and Transportation Systems Sector partners are responsible for supporting the Sector’s mission to continuously improve the security and resilience posture of the nation’s transportation systems to ensure the safety and security of travelers and goods.<sup>78</sup> The 2015 *Transportation Systems Sector-Specific Plan* outlines four strategic goals—goals that outline broad, long-term outcomes to achieve—for how the sector contributes to the overall security and resilience of the Nation’s

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<sup>78</sup>As discussed in the background of this report, the President issued Presidential Policy Directive 21 in 2013, which established national policy on critical infrastructure security and resilience for the nation’s 16 critical infrastructure sectors, including the Transportation Systems Sector, and outlined federal roles and responsibilities for protecting them. Within DHS, the Coast Guard is designated with primary responsibility for the safety, security, and environmental protection of the maritime domain within the Transportation Systems Sector. The Coast Guard works in collaboration with sector partners to achieve shared goals and priorities to reduce critical infrastructure risks. Sector partners include other federal departments and agencies; state, local, tribal, and territorial governments; nongovernmental organizations; and public and private critical infrastructure owners and operators. See Department of Homeland Security and Department of Transportation, *Transportation Systems Sector-Specific Plan* (2015).

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critical infrastructure.<sup>79</sup> The fourth strategic goal is to enhance the all-hazards preparedness and resilience of the global transportation system to safeguard U.S. national interests. To achieve this goal, the sector-specific plan identifies five activities related to the maritime subsector, to include a sector activity to identify, assess, and prioritize efforts to manage supply chain risk using layered defenses.<sup>80</sup>

**Definitions of Strategic Goals, Performance Goals, and Performance Measures**

In prior work, GAO has identified key practices that help agencies achieve results and improve performance, including:

- *Strategic goals:* outcome-oriented statements of aim or purpose. They articulate what the organization wants to achieve in the long-term to advance its mission and address relevant problems, needs, challenges, and opportunities.
- *Performance goals:* specific results an agency expects the program to achieve in the near term. Our prior work indicates that it can be beneficial for performance goals to have specific targets and time frames that reflect strategic goals.
- *Performance measures:* concrete, objective, observable conditions that permit the assessment of progress made towards the agency's goals.

Source: GAO. | GAO-25-106953

According to DHS's 2018 *Transportation Systems Sector Activities Progress Report*, between 2015 and 2018, the Coast Guard made varied progress on the maritime activities outlined in the *Transportation Systems Sector-Specific Plan*.<sup>81</sup> Additionally, in June 2024, Coast Guard officials provided GAO an update on its progress since 2018, stating that Coast Guard had completed three of the five activities outlined in the sector-specific plan. However, agency officials acknowledged that, as of June 2024, the agency has not documented any progress towards achieving the strategic goal since 2018. See table 2 for more information on this strategic goal, the associated maritime activities, and progress in completing these activities.

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<sup>79</sup>The other three goals in the sector-specific plan are (1) manage the security risks to the physical, human, and cyber elements of critical transportation infrastructure; (2) employ the sector's response, recovery, and coordination capabilities to support whole community resilience; and (3) implement processes for effective collaboration to share mission-essential information across sectors, jurisdictions, and disciplines, as well as between public stakeholders. Department of Homeland Security and the Department of Transportation, *Transportation Systems Sector Specific Plan* (2015).

<sup>80</sup>The *Transportation Systems Sector-Specific Plan* also identifies a sixth activity in support of this goal, but the activity is related to the aviation subsector and not the maritime subsector.

<sup>81</sup>Department of Homeland Security and the Department of Transportation, *Transportation Systems Sector Activities Progress Report* (2018).

**Table 2: Completion Status of Maritime Activities Associated with Sector Goal Four of the 2015 *Transportation Systems Sector-Specific Plan*, as Reported by Coast Guard Officials in June 2024**

Sector goal four	Activities to achieve goal	Status
Enhance the all-hazards preparedness and resilience of the global transportation system to safeguard U.S. national interests	Identify, assess, and prioritize efforts to manage supply chain risk using layered defenses in a changing security and operational environment	Complete
	Periodically assess supply chain security risks for all ports that ship cargo to the U.S. under the Cargo Security Initiative.	Complete
	Formalize information sharing arrangements between Federal agencies focused on cargo arriving and departing the U.S., including law enforcement entities operating in the joint National Targeting Center for Cargo and those agencies, such as the Office of Naval Intelligence, focused on cargo moving between foreign ports.	Complete
	Identify and address critical infrastructure supply chain cross-sector dependencies.	Not complete – in progress
	Identify and use lessons learned from supply chain disruption events to inform policies and programs that enhance our Nation’s preparedness.	Not complete – in progress

Source: GAO review of U.S. Coast Guard information. | GAO-25-106953

**Selected Leading Practices Related to Performance Goals and Measures**

According to leading practices we identified to assess the effectiveness of federal efforts, effective organizations establish performance goals and measures to help assess and manage program performance. For goals and measures to be useful for performance management, the practices indicate that they should reflect key attributes, which include being:

- *Objective.* Performance goals and measures are reasonably free of significant bias or manipulation that would prevent them from providing an accurate assessment of performance.
- *Measurable.* Performance goals and measures are able to demonstrate whether or not a specific level of performance can be tangibly demonstrated and independently verified.
- *Quantifiable.* Performance goals and measures have a numerical or measurable value.

Source: GAO. | GAO-25-106953

Note: According to the *Transportation Systems Sector Specific Plan*, the sector’s fourth goal is to enhance the all-hazards preparedness and resilience of the global transportation system to safeguard U.S. national interests.

The *Transportation Systems Sector-Specific Plan* established a strategic goal and activities relevant to assessing DHS’s layered maritime security approach. However, the plan did not establish performance goals or associated performance measures that contain selected key attributes we have identified in prior work.<sup>82</sup> According to key practices we identified to assess the effectiveness of federal efforts, performance goals are target levels of performance to be accomplished within a timeframe and are generally expressed as tangible, measurable objectives. They can also be expressed as quantitative standards, values, or rates. Performance measures are concrete, objective, observable conditions that permit the assessment of progress made toward the agency’s goals.<sup>83</sup> Further, our prior works states that management should establish goals to communicate the results agencies seek to achieve to advance their mission, and to allow decision makers and stakeholders to assess

<sup>82</sup>GAO-23-105460.

<sup>83</sup>GAO-23-105460. Our past work has also identified key characteristics of successful performance measures including that they are clearly stated and have quantifiable, numerical targets or other measurable values that allow for easier comparison with actual performance. See GAO, *Drug Manufacturing: FDA Should Fully Assess its Efforts to Encourage Innovation*, GAO-23-105650 (Washington, D.C.: Mar. 10, 2023).

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performance by comparing planned and actual results.<sup>84</sup> Performance measurement also encompasses the ongoing monitoring and reporting of a program’s accomplishments and progress. Similarly, the National Infrastructure Protection Plan’s *Critical Infrastructure Risk Management Framework* recommends that organizations use metrics and other evaluation procedures to measure progress and assess the effectiveness of efforts to secure and strengthen the resilience of critical infrastructure. The framework further states that doing so informs the process of prioritizing and selecting the most effective and cost-efficient ways to manage risk.<sup>85</sup>

The sector-specific plan cites five activities with related actions the Coast Guard and sector partners could take to achieve the strategic goal (i.e., performance goals). Each activity includes a “measurement of effectiveness” to assess whether they are taking actions to achieve the activities (i.e., performance measures). However, these activities and measures are not objective, quantifiable, or measurable. See figure 9 for our assessment of each activity and their measures of effectiveness.

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<sup>84</sup>[GAO-23-105460](#).

<sup>85</sup>DHS, *National Infrastructure Protection Plan 2013: Partnering for Critical Infrastructure Security and Resilience*; and *Supplemental Tool: Executing A Critical Infrastructure Risk Management Approach*. The 2013 *National Infrastructure Protection Plan* includes the *Critical Infrastructure Risk Management Framework*, which describes the activities that critical infrastructure partners are to collaboratively undertake to inform decision-making on actions intended to address identified infrastructure and related risk. The *Framework* includes the following activities: (1) set goals and objectives by defining specific outcomes, conditions, end points, or performance targets that collectively describe an effective and desired risk management posture; (2) identify infrastructure; (3) assess and analyze risks; (4) implement risk management activities; and (5) measure effectiveness.

**Figure 9: Sector Goal Four’s Associated Activities and Measurements of Effectiveness Compared with Selected Key Attributes of Effective Goals and Measures**

Activity	Measurement of effectiveness	Selected key attributes of effective performance goals and measures		
		Objective	Measureable	Quantifiable
Identify, assess, and prioritize efforts to manage supply chain risk using layered defenses in a changing security and operational environment.	Progress toward achieving comprehensive summary of supply chain risk management and resilience actions pertaining to transportation infrastructure.			
Periodically assess supply chain security risks for all ports that ship cargo to the U.S. under the Cargo Security Initiative.	Progress made in completing assessments.			
Formalize information sharing arrangements between Federal agencies focused on cargo arriving and departing the U.S., including law enforcement entities operating in the joint National Targeting Center for Cargo and those agencies, such as the Office of Naval Intelligence, focused on cargo moving between foreign ports. <sup>a</sup>	Progress made by the joint National Targeting Center for Cargo and the Office of Naval Intelligence to document current mutual support practices and opportunities for improved cooperation.			
Identify and address critical infrastructure supply chain cross-sector dependencies.	Progress made in identifying transportation-related supply chain dependencies of other sectors.			
Identify and use lessons learned from supply chain disruption events to inform policies and programs that enhance our Nation’s preparedness.	Qualitative assessment of frequency and sufficiency of lessons-learned presented to decision makers.			

Goal and measure did not fully align with the attribute

Goal and measure aligned with the attribute

Source: GAO analysis of Department of Homeland Security information, GAO-23-105460, and GAO-23-105399. | GAO-25-106953

Note: According to the *Transportation Systems Sector Specific Plan*, the sector’s fourth goal is to enhance the all-hazards preparedness and resilience of the global transportation system to safeguard U.S. national interests.

<sup>a</sup>The National Targeting Center is staffed by U.S. Customs and Border Protection and Coast Guard personnel, among other federal agencies.

As noted above, all five activities and their corresponding measures of effectiveness are described in a qualitative manner but are not expressed in a measurable or quantifiable manner. For example, none of the activities or measures define a specific, numerical target.<sup>86</sup> For instance, the measure regarding progress made in identifying transportation-related supply chain dependencies of other sectors does not define any specific

<sup>86</sup>An example of a performance goal with a specific, numerical target would be to reduce the number of maritime supply chain disruptions in the U.S. by 50 percent in 2025.

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targets, conditions, or time frames. The lack of specific targets means it is also unclear whether the current goals and measures will be objective measures of progress. For instance, the activity calling to periodically assess supply chain risks for all ports that ship cargo to the U.S. under the Container Security Initiative is not objective because we do not know what specific supply chain risks the activity is referring to or what specific time periods the activity is evaluating. This could allow the Coast Guard and sector partners to present results in ways that look more or less favorable. Further, without formalized performance goals that have target levels of performance to be accomplished within a time frame and associated performance measures that would permit the assessment of progress made toward the agency's goals, the Coast Guard and sector partners cannot assess the effectiveness of their approach for securing vessels and maritime cargo on an ongoing basis.

While the Coast Guard reported making progress on the maritime activities outlined in the sector-specific plan, officials acknowledged that the agency has not yet developed performance goals and related measures for these activities. Coast Guard officials stated that this was because they were waiting for an update to Presidential Policy Directive 21 before continuing work.<sup>87</sup> In April 2024, the President issued National Security Memorandum 22 to replace Presidential Policy Directive 21. National Security Memorandum 22 calls for designated sector risk management agencies, such as the Coast Guard, to identify the most significant critical infrastructure risks to their sector and develop or refresh an associated sector-specific risk management plan every 2 years. Further, the memorandum calls for agencies to develop objective performance goals and metrics to mitigate risks.<sup>88</sup> Officials stated that in response to this, the agency began to develop an updated sector risk assessment to inform the updates to its sector risk management plan, which will describe the sector's goals and activities. They also noted that the agency is still early in the process of developing the new sector risk management plan, which is to be completed by January 2025. They said they planned to continue carrying out work for the five sector-specific

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<sup>87</sup>In 2013, the President issued Presidential Policy Directive 21, which established national policy on critical infrastructure security and resilience for the nation's 16 critical infrastructure sectors and outlined federal roles and responsibilities for protecting them. See The White House, *Presidential Policy Directive 21: Critical Infrastructure Security and Resilience* (Washington, D.C.: Feb. 12, 2013).

<sup>88</sup>The White House, *National Security Memorandum 22: Critical Infrastructure Security and Resilience* (Washington, D.C.: Apr. 30, 2024).

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activities identified in the 2015 plan, in addition to developing performance measures.

As previously discussed, organizations should establish performance goals and measures that are objective, measurable, and quantifiable. Additionally, organizations should use metrics and other evaluation procedures to measure progress and assess the effectiveness of efforts to secure and strengthen the resilience of critical infrastructure.<sup>89</sup> Coast Guard officials acknowledged that it has not yet developed such goals and measures. By updating the new sector risk management plan with performance goals and performance measures that are objective, quantifiable, and measurable, the Coast Guard and its Transportation Systems Sector partners will be better positioned to assess the effectiveness of their progress as required by National Security Memorandum 22. Using these performance goals and performance measures as a tool to assess the effectiveness of their approach on an ongoing basis would better position the agency and sector partners to monitor progress and determine how to best allocate resources to achieve the desired risk management posture for securing vessels and maritime cargo. Further, doing so would provide additional information that could help Congress oversee efforts the Coast Guard and sector partners are taking to accomplish their mission.

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## Conclusions

The secure transit of U.S.-bound vessels and maritime cargo is vital to the global supply chain and the U.S. economy. Criminal activity or terrorist attacks using cargo shipments could cause disruptions to the supply chain and limit global economic growth and productivity. Coast Guard and CBP at nearly all field units included in our review generally followed five selected leading collaboration practices in their efforts to secure U.S.-bound vessels and maritime cargo from national security risks. Additionally, the Coast Guard, the DHS agency assigned with responsibility for leading efforts to support the maritime domain under the *Transportation Systems Sector Specific Plan*, and sector partners have identified a strategic goal and activities relevant to assessing DHS's layered maritime security approach.

However, the Coast Guard and sector partners have not developed objective, measurable, and quantifiable performance goals and associated measures that would allow the agency and its partners to

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<sup>89</sup>GAO-23-105460, GAO-23-105650; DHS, *National Infrastructure Protection Plan 2013: Partnering for Critical Infrastructure Security and Resilience*; and *Supplemental Tool: Executing A Critical Infrastructure Risk Management Approach*.

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effectively assess its approach on an ongoing basis. By developing and using such performance goals and measures to assess the effectiveness of its layered maritime security approach on an ongoing basis, the Coast Guard and sector partners will have a better understanding of the effectiveness of each activity in achieving their strategic goal. Further, Congress, the Coast Guard, and sector partners will be better positioned to oversee whether the agency is achieving its mission. Such assessments could help them make informed decisions about which maritime security efforts should be continued or expanded and where resources should be allocated and select the most effective ways to mitigate supply chain risks in the maritime domain.

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## Recommendations for Executive Action

We are making two recommendations to the Coast Guard. Specifically:

The Commandant of the Coast Guard, in coordination with Transportation Systems Sector partners, should develop objective, measurable, and quantifiable performance goals and associated performance measures. (Recommendation 1)

The Commandant of the Coast Guard, in coordination with Transportation Systems Sector partners, should use the performance information collected to assess progress toward strategic and performance goals and the overall effectiveness of the layered approach to securing vessels and maritime cargo on an ongoing basis. (Recommendation 2)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided written comments, which are reproduced in appendix II. DHS concurred with our recommendations and described planned actions to address them. DHS also provided technical comments, we which incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, the report is also available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8777 or [macleodh@gao.gov](mailto:macleodh@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on



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the last page of this report. GAO staff who made key contributions to this report are listed in appendix III.

A handwritten signature in black ink, appearing to read "H MacLeod". The signature is stylized with a large initial "H" and a cursive "MacLeod".

Heather MacLeod  
Director, Homeland Security and Justice

# Appendix I: Locations of Officials Interviewed and Methods

To determine the extent to which the U.S. Coast Guard and U.S. Customs and Border Protection (CBP) officials followed selected leading collaboration practices, we gathered information at the field-level by conducting semi-structured interviews with a non-generalizable sample of Coast Guard and CBP officials from 16 field units at eight selected U.S. seaports. Participating officials ranged from leadership—such as CBP Port Directors, Coast Guard sector department heads, and Coast Guard Captains of the Port—to front-line personnel responsible for specific operations at the seaports.<sup>1</sup> In addition to the semi-structured interviews, we obtained documents relevant to collaborative efforts—including documents specific to the individual seaport—and sent follow-up questions regarding collaboration efforts, when necessary.

We conducted in-person site visits to two of the eight U.S. seaports identified in our site selection—the Port of Los Angeles-Long Beach and the Port of Miami—to observe Coast Guard and CBP port-level operations and obtain information on any collaboration or information-sharing activities used by seaport-level officials to secure vessels and maritime cargo. See table 3 for a list of locations we selected to interview Coast Guard and CBP officials from the responsible field units.

**Table 3: Location of U.S. Customs and Border Protection (CBP) and U.S. Coast Guard Officials Interviewed**

Location	Agency area of responsibility
Los Angeles, California	Port of Los Angeles-Long Beach (CBP) and Sector Los Angeles-Long Beach (Coast Guard)
Norfolk, Virginia	Port of Norfolk-Newport News (CBP) and Sector Virginia (Coast Guard)
Miami, Florida	Port of Miami (CBP) and Sector Miami (Coast Guard)
Duluth, Minnesota	Port of Duluth-Superior (CBP) and Marine Safety Unit Duluth (Coast Guard)
Honolulu, Hawaii	Port of Honolulu (CBP) and Sector Honolulu (Coast Guard)
Staten Island, New York and Newark, New Jersey	Port of New York-New Jersey (CBP) and Sector New York (Coast Guard)
Houston, Texas	Port of Houston (CBP) and Sector Houston-Galveston (Coast Guard)
Portsmouth, New Hampshire	Port of Portsmouth (CBP) and Sector Northern New England (Coast Guard)

Source: CBP and Coast Guard. | GAO-25-106953

<sup>1</sup>As we previously described in this report, CBP Port Directors are responsible for managing the day-to-day cargo security operations for U.S. seaports within their geographic area of responsibility. Similarly, Coast Guard Commanders and Captains of the Port are responsible for managing law enforcement activities within their geographic area of responsibility. See 33 C.F.R. §§ 1.01-30, -1, 125.05.

To select the U.S. seaport locations, we collected and analyzed Coast Guard data on vessel inspections and examinations, and CBP Automated Commercial Environment data on cargo volume and source for calendar years 2019-2023. Using these data, we selected U.S. seaport locations to obtain variation in, among other things, port size based on total import volume, the primary type(s) of cargo (e.g., containerized and non-containerized), the percentage of cargo volume made up of imports from other countries, the number of Coast Guard vessel inspections and examinations, and a diversity of geographic regions. To assess the reliability of data used for site selection, we reviewed documentation on the systems such as user guides and data dictionaries, reviewed the data for obvious errors and omissions, and interviewed agency officials responsible for maintaining the data and relevant data systems. We determined the data were reliable for the purposes of our reporting objectives.

We then analyzed responses of officials from 16 field units at eight U.S. seaports by conducting a content analysis to see whether they followed selected leading collaboration practices.<sup>2</sup> We selected five of the eight leading collaboration practices because they were the most relevant to the researchable objective and agencies in our scope. The practices we selected were (1) define common outcomes; (2) clarify roles and responsibilities; (3) include relevant participants; (4) leverage resources and information; and (5) develop and update written guidance and agreements. Specifically, we reviewed Coast Guard and CBP officials' responses at each seaport location and coded whether their responses indicated that they followed one or more of the five selected leading practices.

To improve the validity of results, responses of Coast Guard and CBP officials we interviewed from each seaport location were coded independently by two analysts, who then compared the coding results. In instances where the analysts had differing results for a leading practice, they discussed their reasoning and reached agreement on which codes were the most appropriate.

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<sup>2</sup>See GAO, *Government Management: Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges*, [GAO-23-105520](#) (Washington, D.C.: May 24, 2023).

# Appendix II: Comments from the Department of Homeland Security

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



**Homeland  
Security**

BY ELECTRONIC SUBMISSION

December 28, 2024

Heather MacLeod  
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-25-106953, "MARITIME CARGO SECURITY: Additional Efforts Needed to Assess the Effectiveness of DHS's Approach"

Dear Ms. MacLeod:

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 recognition that the Department uses a layered maritime security approach to identify potentially high-risk, U.S.-bound vessels and cargo shipments. GAO also acknowledged that the U.S. Coast Guard and U.S. Customs and Border Protection—at the 16 field units across eight U.S. seaports included in GAO's review—generally followed leading collaboration practices in efforts to secure U.S.-bound vessels and maritime cargo from national security risks. The Coast Guard committed remains fully assessing the effectiveness of its approach for securing vessels and maritime cargo to ensure decision makers are fully informed, such as when considering allocation of resources.

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, as appropriate.

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

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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: 2024.12.28 16:00:00 -05'00'

JIM H. CRUMPACKER  
Director  
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendations  
Contained in GAO-25-106953**

GAO recommended the Commandant of the U.S. Coast Guard, in coordination with Transportation System Sector partners:

**Recommendation 1:** Develop objective, measurable, and quantifiable performance goals and associated performance measures.

**Response:** Concur. Coast Guard’s Office of Port and Facility Compliance (CG-FAC), will serve as the lead for this effort, as the primary liaison for the Coast Guard’s Sector Risk Management Agency (SRMA) role.<sup>1</sup> Currently, the Coast Guard is already working with the Transportation System Sector co-SRMAs (Department of Transportation (DOT) and Transportation Security Administration (TSA)) to update the Sector Risk Management Plan pursuant to NSM-22, which established policy to advance a national unity of effort for secure, functioning, and resilient critical infrastructure.

Once complete, this updated Sector Risk Management Plan will be the primary mechanism for defining objective, measurable, and quantifiable performance goals and associated performance measures. USCG, led by CG-FAC, will also continue discussions with co-SRMAs to determine whether any additional actions are needed, as appropriate. Estimated Completion Date (ECD): March 31, 2025.

**Recommendation 2:** Use the performance information collected to assess progress toward strategic and performance goals and the overall effectiveness of the layered approach to securing vessels and maritime cargo on an ongoing basis.

**Response:** Concur. CG-FAC, as the primary liaison for the Coast Guard’s SRMA role, will work with DHS program offices, as needed, as well as co-SRMAs DOT and TSA to update the Sector Risk Management Plan pursuant to NSM-22, as previously noted. As NSM-22 requires SRMAs to update the Sector Risk Management Plan every 2 years, CG-FAC will use the performance information collected as part this recurring review of goals and effectiveness to assess progress toward strategic and performance goals and the overall effectiveness of the layered approach to securing vessels and maritime cargo on an ongoing basis. ECD: March 31, 2025.

<sup>1</sup> Critical infrastructure sectors have assets, systems, and networks, whether physical or virtual, which are considered so vital to the United States that their incapacitation or destruction would have a debilitating effect on security, national economic security, national public health or safety, or any combination thereof. Coast Guard, as a SRMA, leverages knowledge and expertise to coordinate and collaborate with DHS and other relevant entities, as appropriate, to implement “National Security Memorandum 22: Critical Infrastructure Security and Resilience,” (NSM-22), dated April 30, 2024.

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# Appendix III: GAO Contact and Staff Acknowledgements

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## GAO Contact

Heather MacLeod, (202) 512-8777 or [MacLeodH@gao.gov](mailto:MacLeodH@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Hugh Paquette (Assistant Director), Ricki Gaber (Analyst-in-Charge), Kevin Gonzalez, Benjamin Schaefer, and Emily Thomas made key contributions to this report. Also contributing to this report were Lauri Barnes, Benjamin Crossley, Dominick Dale, Kaelin Kuhn, Ben Licht, Nancy Lueke, Amanda Miller, Mary Offutt-Reagin, Janet Temko-Blinder, and Sarah Veale.

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