



United States Government Accountability Office

Report to Congressional Committees

FEBRUARY 2025

DHS Annual Assessment

Improved Guidance on Revised Acquisition Goals Would Enhance Transparency

BORDER SECURITY	DISASTER RESPONSE	CUSTOMS	
TRANSPORTATION SECURITY	CYBERSECURITY	IMMIGRATION	



GAO Highlights

Highlights of [GAO-25-107317](#), a report to congressional committees

February 2025

DHS ANNUAL ASSESSMENT

Improved Guidance on Revised Acquisition Goals Would Enhance Transparency



Offshore Patrol Cutter



Border Security



FEMA Disaster Relief

Source (left to right): U.S. Coast Guard; CBP/Josh Denmark; and FEMA/Patsy Lynch. | GAO-25-107317

Why GAO Did This Study

DHS plans to spend over \$41 billion to acquire systems for its current portfolio of major acquisition programs.

The Explanatory Statement accompanying a bill for the DHS Appropriations Act, 2015 includes a provision for GAO to review DHS's major acquisitions on an ongoing basis. This report assesses (1) the extent to which major programs are meeting cost and schedule goals; (2) the status of cost or schedule risks; and (3) opportunities for improvement.

GAO selected 24 of DHS's largest acquisition programs to determine program status as of the end of fiscal year 2024. Of these, GAO identified 17 with DHS-approved acquisition baselines for further analysis. GAO reviewed key documents; collected cost, schedule, and performance information; and interviewed DHS officials. GAO also reviewed prior GAO recommendations to DHS.

What GAO Recommends

GAO is recommending that DHS update its guidance to specify the types of change drivers that major acquisition programs document when revising baselines. DHS agreed with this recommendation.

View [GAO-25-107317](#). For more information, contact Travis J. Masters at (202) 512-4841 or masters@gao.gov.

What GAO Found

The Department of Homeland Security (DHS) invests billions of dollars to acquire systems and capabilities that advance maritime safety, respond to natural disasters, secure the border, and more.

All but one of the 17 DHS major acquisition programs with DHS-approved baselines that GAO analyzed are meeting their current cost and schedule goals; however, nearly all of the programs had revised their goals at least once, with seven having revised their goals three or more times. These goals are set in their acquisition program baselines—the agreement between programs and decision-makers about an acquisition's cost and when its capabilities will be delivered. Revisions can reflect increased costs, changes in capabilities, or result in new milestone dates. For instance, since these 17 programs initially set their cost goals, the goals have increased from a total of \$33.1 billion to \$41.3 billion.

GAO found that several programs revised their baselines without clearly documenting the reasons for the revisions in the approved baseline document. DHS's guidance notes the importance of tracking the causes of baseline revisions but does not specify the types of change drivers that can result in revisions, such as a change in requirements. If programs consistently document the change drivers that led to revised baselines, decision-makers would better understand how well programs, especially older ones, are executed over time.

Further, over half of DHS's 24 major programs face cost or schedule risks.

Costs risks. Two Coast Guard programs that comprised over a third of DHS's estimated acquisition costs in fiscal year 2024—Polar Security Cutter (PSC) and Offshore Patrol Cutter—are likely to drive cost growth in fiscal year 2025. For instance, in August 2024, the Congressional Budget Office estimated the PSC program cost to be about \$2 billion over the program's current cost goal.

Schedule risks. Fifteen programs face potential delays moving forward, including multiple Coast Guard and Customs and Border Protection programs. Program officials cited reasons such as funding challenges, among others.

Since 2014, GAO has made about 220 acquisition and major acquisition program policy recommendations to DHS. The agency has addressed most of these recommendations, but almost 50 recommendations have not yet been fully addressed. These recommendations represent opportunities for improvement in areas such as Coast Guard acquisitions and DHS's acquisition workforce.

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Abbreviations

ADE	acquisition decision event
APB	acquisition program baseline
CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
FOC	full operational capability
HART	Homeland Advanced Recognition Technology
IOC	initial operational capability
JRC	Joint Requirements Council
KPP	key performance parameter
LCCE	life-cycle cost estimate
MRS	Medium Range Surveillance Aircraft
PARM	Office of Program Accountability and Risk Management
OPC	Offshore Patrol Cutter
PC&I	procurement, construction, and improvements
PSC	Polar Security Cutter

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February 25, 2025

Congressional Committees

The Department of Homeland Security (DHS) invests tens of billions of taxpayer dollars in systems and capabilities intended to secure the border, advance maritime safety, screen travelers, enhance cybersecurity, improve disaster response, and execute a wide variety of other operations. DHS develops and obtains these systems and capabilities through acquisition programs. DHS’s “major acquisition programs” are those that involve life-cycle costs of at least \$300 million, which includes developmental costs. Major acquisition programs take multiple years to develop, test, and deploy systems and capabilities to end users.¹ This is our 10th year reviewing these programs.

To help manage its acquisition programs, DHS established an acquisition management policy in November 2008. Over time, department leadership has dedicated resources and implemented additional guidance designed to improve acquisition oversight. We have found the policy to be generally sound in that it reflects key program management practices identified in our prior work. Nevertheless, we have highlighted challenges that DHS has faced in implementing the policy and strengthening its acquisition management function.

The Explanatory Statement accompanying a bill for the Department of Homeland Security Appropriations Act, 2015 contains a provision for GAO to conduct ongoing reviews of DHS major acquisition programs, as directed in the Senate report.² This review assesses (1) the extent to which selected DHS major acquisition programs are meeting their baseline cost, schedule, and performance goals; (2) the status of the DHS acquisition portfolio, including any cost and schedule risks; and (3)

¹DHS defines major acquisition programs as those with life-cycle cost estimates of \$300 million or more. In some cases, DHS may define a program with a life-cycle cost estimate less than \$300 million as a major acquisition if it has significant strategic or policy implications for homeland security, among other things.

²Explanatory Statement submitted by Mr. Rogers of Kentucky, Chairman of the House Committee on Appropriations, regarding H.R. 240, Department of Homeland Security Appropriations Act, 2015, 161 Cong. Rec., H-276 (Jan. 13, 2015) (referencing S. Rep. No. 113-198, at 22-23).

what opportunities remain for DHS to further improve its acquisition management.

To conduct our assessment, we selected 24 programs from the 36 major acquisition programs identified in DHS’s January 2024 Master Acquisition Oversight List. DHS defines major acquisitions as level 2 for programs with life-cycle cost estimates from \$300 million to less than \$1 billion and level 1 for programs with life-cycle cost estimates of \$1 billion or more.

This report contains our assessment of the 24 programs we selected. Of those programs 16 are level 1 major acquisition programs, all of which had at least one segment in the process of obtaining new capabilities at the initiation of this review. The other eight programs are level 1 or level 2 major acquisition programs that we identified as at risk of not meeting cost, schedule, or performance goals. We excluded the remaining 12 major acquisition programs for a variety of reasons, including lower risk programs already in deployment. See table 1 for the full list of programs that we selected to review.

Table 1: DHS Major Acquisition Programs Selected by GAO for Review (Acquisition Level as of Jan. 2024)

DHS component	Program	Program category	Acquisition level
Cybersecurity and Infrastructure Security Agency (CISA)	Continuous Diagnostics and Mitigation (CDM)	Threat detection monitoring	1
	Cyber Analytic and Data System (CADS) ^a	Threat detection monitoring	1 ^b
	Next Generation Network Priority Services (NGN-PS) Phase 1	Telecommunications	2
	NGN-PS Phase 2 ^a	Telecommunications	2
Management Directorate (MGMT)	Homeland Advanced Recognition Technology (HART)	Dashboards/user interface	1
Federal Emergency Management Agency (FEMA)	Enterprise Data and Analytics Modernization Initiative (EDAMI)	Dashboards/user interface	2
	Grants Management Modernization (GMM)	Dashboards/user interface	2
	Integrated Public Alert and Warning System (IPAWS)	Telecommunications	2
Transportation Security Administration (TSA)	Checkpoint Property Screening System (CPSS)	Screening operations	1
	Credential Authentication Technology (CAT)	Screening operations	2
U.S. Coast Guard (USCG)	Medium Range Recovery Helicopter (MH-60T)	Aviation operations	1
	Medium Range Surveillance (MRS) Aircraft (HC-144B, HC-27J)	Aviation operations	1
	Offshore Patrol Cutter (OPC)	Maritime operations	1
	Polar Security Cutter (PSC)	Maritime operations	1

DHS component	Program	Program category	Acquisition level
	Waterways Commerce Cutter (WCC)	Maritime operations	1
U.S. Customs and Border Protection (CBP)	Automated Commercial Environment (ACE)	Dashboards/user interface	1
	Biometric Entry-Exit Program (BE-E)	Screening operations	1
	Cross-Border Tunnel Threat (CBTT) ^a	Threat detection monitoring	1
	Common Operating Picture (COP) ^a	Threat detection monitoring	2
	Integrated Surveillance Towers (IST) ^a	Threat detection monitoring	1
	Light Enforcement Platform (LEP) ^a	Aviation operations	1
	Medium Lift Helicopter (MLH)	Aviation operations	1
	Multi-Role Enforcement Aircraft (MEA)	Aviation operations	1
	Non-Intrusive Inspection Integration Program (NII-I) ^a	Threat detection monitoring	1

Source: GAO analysis of Department of Homeland Security (DHS) data. | GAO-25-107317

^aThis program had not yet established an acquisition program baseline approved by DHS leadership as of September 30, 2024.

^bCADS is designated as a level 1 major acquisition program using the DHS rapid acquisition framework, which enables rapid delivery of capabilities to the field.

To determine the extent to which the 24 selected programs were meeting their established goals, we analyzed key acquisition documentation containing program cost, schedule and performance information, including acquisition program baselines (APB). Seventeen programs had department-approved APBs as of September 30, 2024 while seven did not. As a result, we excluded these seven programs from our analysis of APBs. None of these seven programs have progressed to the point in the acquisition lifecycle framework where an approved APB is required by DHS policy.

To determine the status of the portfolio of 24 programs we selected, including any cost and schedule risks, we reviewed program documentation and conducted interviews. To understand current costs and schedule milestones achieved in the last year we reviewed life-cycle cost estimate data as of September 30, 2024, program documentation, responses to a standardized questionnaire sent to all programs, and interviews with program officials. To understand upcoming schedule and cost risks, we reviewed program interviews, program documentation such as acquisition decision memos, and external sources such as information from the Congressional Budget Office. Unless otherwise noted, all dollar values reported are in fiscal year 2023 dollars.

To identify what opportunities remain to improve DHS acquisition management, we reviewed the current status of our prior recommendations from our internal recommendation tracking system. To determine how DHS acquisitions have improved over the past 10 years in response to our recommendations, we reviewed our prior reports and how DHS responded to them, including DHS annual assessments, reports on DHS major acquisitions, and the High-Risk Series.

Overall, we conducted individual assessments for all 24 programs. For each of the 24 selected programs, we analyzed key acquisition documents such as APBs and life-cycle cost estimates. We used a standardized questionnaire to collect information on cost, schedule, and performance progress. We interviewed program and component officials to discuss current program status as of September 2024.

Appendix I presents individual assessments of and information about each of the 24 programs we reviewed. The assessments include key information such as the status of each program's schedule, cost, and performance and testing (hereafter referred to as performance). Our program assessments are intended to provide decision-makers a means to quickly gauge a program's progress and the extent to which it might face cost, schedule, or performance risks.

Appendix II provides detailed information on our objectives, scope, and methodology.

We conducted this performance audit from January 2024 to February 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.

Background

To help manage its multi-billion-dollar acquisition portfolio, DHS established policies and processes for acquisition management, test and evaluation, and resource allocation. The department uses these policies and processes to guide the development and delivery of systems that are intended to close critical capability gaps, helping enable DHS to execute its missions and achieve its goals. We have made recommendations to DHS as part of our prior work, including earlier DHS Annual Assessments.

Acquisition Management Policy and Oversight

DHS's policies and processes for managing its major acquisition programs are primarily contained in its Acquisition Management Directive 102-01 and Acquisition Management Instruction 102-01-001 (hereafter referred to as acquisition management policy). DHS issued the initial version of the directive in November 2008 in an effort to establish an acquisition management system that effectively provides required capability to program operators in support of the department's missions. DHS has issued multiple updates to the directive and related instruction, in part to be responsive to our recommendations. DHS issued the current version of the directive in February 2019 and the current version of the instruction in April 2024.³

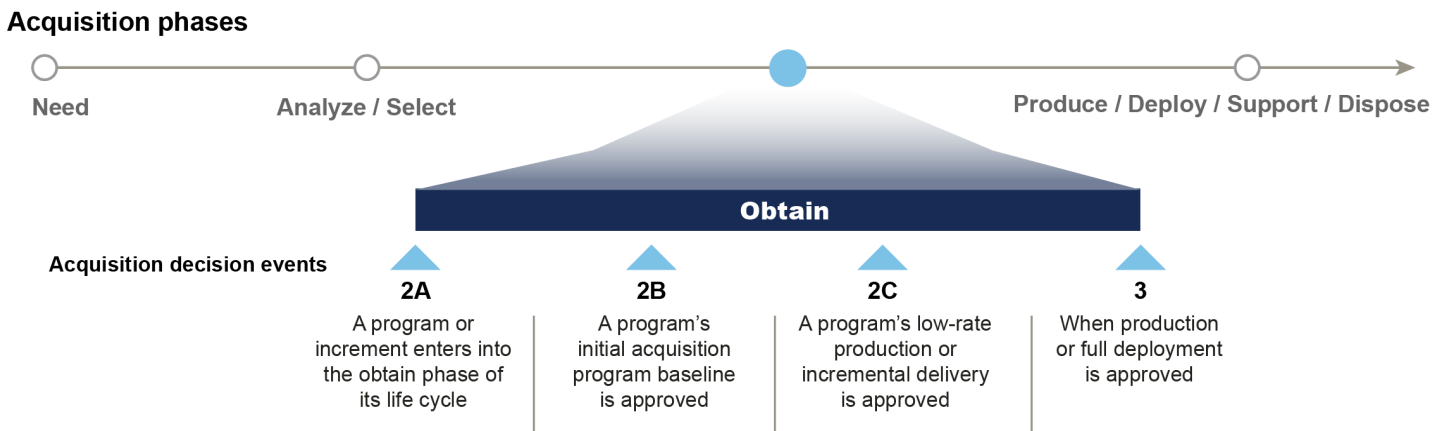
The Under Secretary for Management is the acquisition decision authority for the department's largest acquisition programs—level 1 programs and level 2 programs. Component Acquisition Executives—typically the most senior acquisition management official within each DHS component—may be delegated acquisition decision authority for level 2 programs.

DHS acquisition management policy, which is further detailed in the directive and instruction—establishes an acquisition life-cycle framework that identifies major milestones that a program must complete.⁴ It also identifies a series of acquisition decision events (ADE) where the acquisition decision authority reviews key documents to assess whether the program is ready to proceed to the next phase and, if so, approves those documents. Depending on the program, these events can occur simultaneously, within months of each other, or be separated by several years. Figure 1 reflects DHS's acquisition life cycle.

³Department of Homeland Security, *Acquisition Management Directive*, DHS Directive 102-01 (July 28, 2015) (incorporating change 1, Feb. 25, 2019); and *Acquisition Management*, DHS Instruction 102-01-001 (Jan. 10, 2023) (incorporating change 1, Apr. 17, 2024).

⁴*Acquisition Management Directive*, DHS Directive 102-01; and *Acquisition Management*, DHS Instruction 102-01-001. The DHS acquisition life-cycle framework includes phases designed to identify the need for a new acquisition program; review alternative approaches to meeting the need and recommending a best option; develop, test and evaluate the selected option; produce and deliver the capability to its operators; and maintain the capability until it is retired.

Figure 1: DHS Acquisition Decision Events in the Obtain Phase for Major Acquisition Programs



Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

DHS's acquisition policies also include a 2020 instruction that outlines a rapid acquisition life-cycle framework, which is intended to enable rapid delivery of capabilities to the field by streamlining the standard acquisition framework and requiring more technical maturity of the acquired solution.⁵

DHS acquisition management policy states that the APB is the agreement between the acquisition program, component, and department-level officials that establishes how systems being acquired will perform, when they will be delivered, and what they will cost. The APB approved by DHS at a program's ADE 2B establishes objective (target) and threshold (maximum acceptable for cost, latest acceptable for schedule, and minimum or maximum acceptable for performance) parameters. We refer to the threshold parameter as a goal.

DHS revised its acquisition management policy in 2019 to require the acquisition decision authority to approve APBs at ADE 2B. DHS revised its policy in response to our recommendation to ensure programs have well-defined technical requirements and key technical reviews completed before programs establish APBs.⁶ Under the prior version of the policy,

⁵Department of Homeland Security, *Rapid Acquisition*, DHS Instruction 102-01-011, (Feb. 25, 2020) (incorporating change 1, Aug. 28, 2020).

⁶GAO, *Homeland Security Acquisitions: Earlier Requirements Definition and Clear Documentation of Key Decisions Could Facilitate Ongoing Progress*, [GAO-17-346SP](#) (Washington, D.C.: Apr. 6, 2017).

APB approval was required at ADE 2A. Under the current acquisition management policy, programs still prepare a component-approved preliminary APB for ADE 2A that lays out preliminary cost, schedule, and performance goals.

According to the Director, Office of Test and Evaluation, programs traditionally use key performance parameters (KPP) from their Operational Requirements Document as the APB performance goals. The DHS requirements manual describes KPPs as a program's most important and nonnegotiable requirements that a system must meet to fulfill its fundamental purpose. KPPs include things like airspeed for an aircraft or the detection range for a surveillance system.

According to DHS acquisition management policy, a program that has not met or will not meet any cost, schedule, or performance threshold approved in the APB at ADE 2B will be considered in breach status, or, in certain circumstances, result in an administrative update. An administrative update may be approved by the acquisition decision authority due to a change in scope resulting from situations outside of the program's control, such as natural events or changes in funding, among others.⁷

If a program does not satisfy an approved APB threshold or if the program manager forecasts a threshold will not be met in the future, the program manager is to formally notify the Component Acquisition Executive and acquisition decision authority in a memorandum identifying the root cause and operational effect of the unmet threshold. The Executive Director, Office of Program Accountability and Risk Management (PARM), assesses the formal notification memorandum to determine whether the acquisition program requires an administrative update or is in breach status. We collectively refer to any of these updates to an APB as revisions.

Programs in breach status are required to develop a remediation plan before they can exit breach status. These plans should outline a time frame for the program to either return to its APB parameters, rebaseline (i.e., establish new cost, schedule, or performance parameters), or have a

⁷If the root cause for not meeting a baseline parameter does not meet the criteria for an administrative update or the program requires more than 12 months to be within approved APB parameters, the program will be determined to be in breach status. *Acquisition Management*, DHS Instruction 102-01-001.

DHS-led program review that results in recommendations for a revised APB.

In addition to the acquisition decision authority, other bodies and senior officials support DHS's acquisition management function:

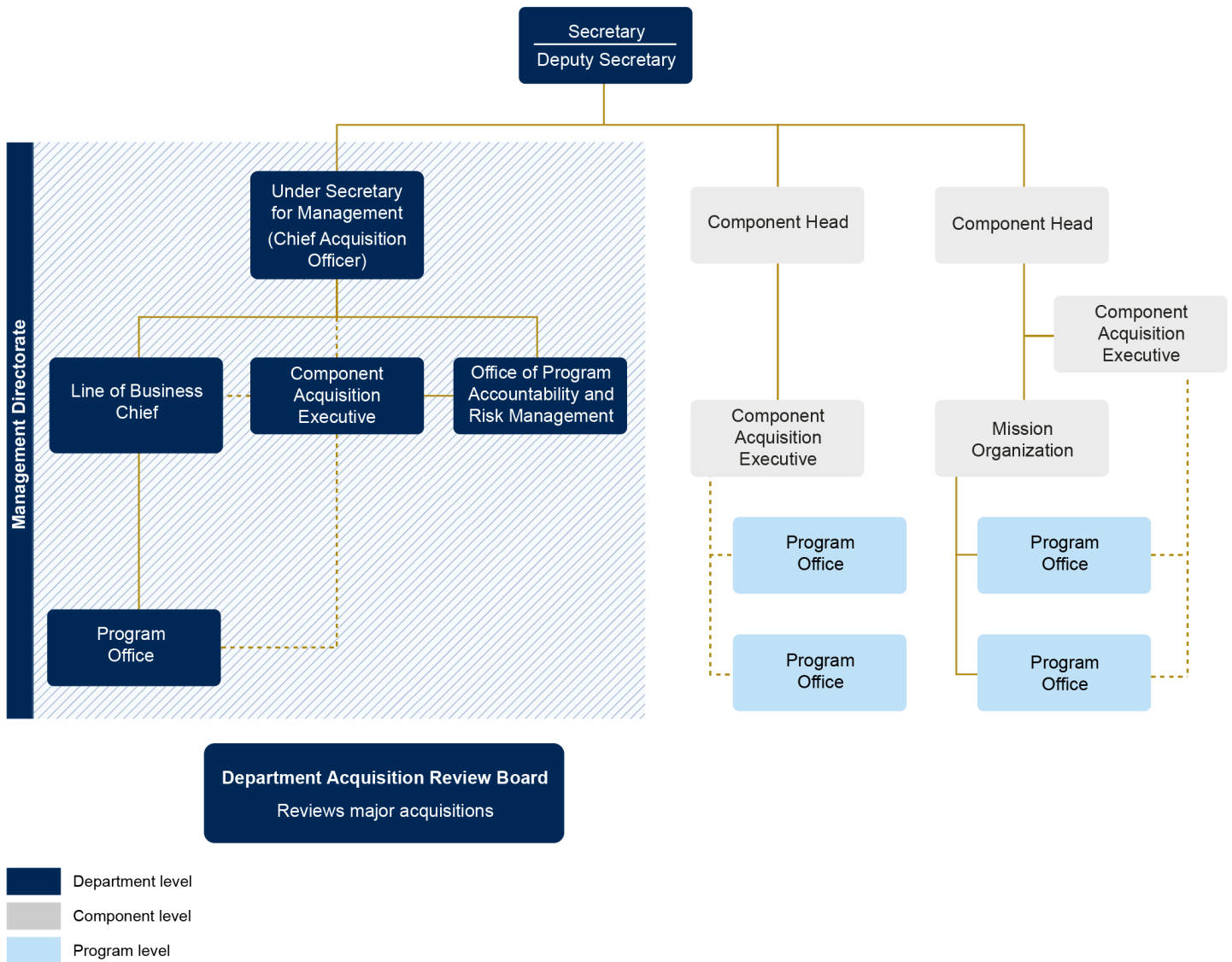
- **The Acquisition Review Board** reviews major acquisition programs for proper management, oversight, accountability, and alignment with the department's strategic functions at ADEs and other meetings as needed.
- **The Line of Business Chiefs** include the DHS Chief Financial Officer, the Chief Information Officer, the Chief Procurement Officer, the Chief Human Capital Officer, the Chief Security Officer, and the Chief Readiness Support Officer, among others. The Line of Business Chiefs are responsible and accountable for adhering to the department's acquisition policies and procedures to ensure sound management, review, support, and approval. The Line of Business Chiefs are also members of the Acquisition Review Board.
- **The Office of Program Accountability and Risk Management (PARM)** is responsible for DHS's overall acquisition program governance process, supports the Acquisition Review Board, and reports directly to the Under Secretary for Management. The office develops and updates acquisition management policy and procedures, reviews major programs, provides guidance for workforce planning activities, and provides support to program managers.
- **Components**, such as U.S. Customs and Border Protection, the Transportation Security Administration, and the U.S. Coast Guard, sponsor specific acquisition programs.⁸ Once programs complete delivery of all planned capabilities to end users and reach full operational capability, the component provides oversight.
 - **Component Acquisition Executives** are responsible for overseeing the progress of their respective portfolios.

⁸DHS's components consist of operational components—those that have responsibility for directly achieving one or more of the department's missions or activities—and support components—those that generally provide assistance or guidance to other DHS components or external organizations. For example, the Management Directorate is a support component that generally provides assistance and guidance to other DHS components and external organizations and includes functions like budget, finance, information technology, facilities, human capital, and acquisitions. However, the Management Directorate also manages acquisition programs. Typically, these programs are those that involve multiple components, such as programs related to relocating the DHS headquarters and updates to financial systems for multiple components.

-
- **Program offices**, also within the components, are responsible for planning and executing DHS's individual programs. They are expected to do so within the cost, schedule, and performance parameters established in their APBs. If they cannot do so, programs may be approved for an administrative update or may be considered in breach status and must take specific steps, as noted above.
 - **Program user representatives** have overall responsibility for defining capability requirements and are involved in ensuring the overall test and evaluation strategy properly reflects those requirements and the overall operational environment, including the threat. The user representative identifies mission critical functions, contributes to the development of failure definition and scoring criteria, and coordinates for representative system operators and maintainers to support test and evaluation activities.

Figure 2 depicts the relationship between acquisition program managers at the department, component, and program level.

Figure 2: Department of Homeland Security's Acquisition Management Structure



Source: GAO analysis of Department of Homeland Security information. | GAO-25-107317

Test and Evaluation Policy

In October 2020, DHS issued a revision to Test and Evaluation Instruction 026-06-001, which sets forth policies and processes for test and evaluation of the capabilities delivered by the department's major

acquisition programs.⁹ The instruction states the primary purpose of test and evaluation is to provide timely, accurate information to program managers, decision-makers, and other stakeholders to reduce programmatic, financial, schedule, and performance risks.

DHS test and evaluation policy—outlined in Test and Evaluation Instruction 026-06-001 as well as DHS Directive 026-06—assigns specific responsibilities to particular individuals and entities throughout the department:¹⁰

- **Program managers** have overall responsibility for planning and executing their programs' test and evaluation strategies, including scheduling and funding test and evaluation activities, delivering systems for testing, and developing a program's test and evaluation master plan.
- **Independent test agents** are responsible for planning, conducting, analyzing, assessing, and reporting on test and evaluation. Their job is to identify whether a system can meet its KPPs and provide an evaluation of the operational effectiveness, suitability, and resilience of a system in a realistic environment. The independent test agents may be within the component, another government agency, or a contractor, but must be independent of the program manager, end user, and developer.
- **The Director, Office of Test and Evaluation** is responsible for approving major acquisition program independent test agents, operational test and evaluation plans, and test and evaluation master plans. As appropriate, the Director is also responsible for overseeing operational test and evaluation, reviewing independent test agent reports, and assessing those reports.

As an acquisition program proceeds through its life cycle, the testing emphasis moves gradually from developmental test and evaluation to operational test and evaluation. Earlier developmental testing is aimed at reducing risk and determining the likelihood the system will meet requirements. After developmental testing, programs transition to operational testing which is used to determine the operational effectiveness, operational suitability, and operational resilience of the

⁹Department of Homeland Security, *Test and Evaluation*, DHS Instruction 026-06-001 (Oct. 1, 2020).

¹⁰*Test and Evaluation*, DHS Instruction 026-06-001; and *Test and Evaluation*, DHS Directive 026-06, (May 5, 2017).

system. Programs typically conduct operational test and evaluation to support a full-rate production decision at ADE 3. In addition to operational test and evaluation, programs must complete an assessment of cyber resilience to inform ADE 3.

Prior GAO Work on DHS Acquisitions

As part of our High-Risk Series, we report on government operations that we have identified as having serious weaknesses in areas involving substantial resources and providing critical services to the public. We previously identified acquisition management as an area needing management attention at DHS, but in 2023 determined that DHS had made sufficient progress in addressing acquisition-related issues to warrant its removal.¹¹ The acquisition-related actions DHS improved in included:

- Timely validation of required documents,
- Development of component-level acquisition capability,
- Training of acquisition personnel,
- Ensuring acquisition process compliance, and
- Oversight by the Joint Requirements Council (JRC)—a component-level council that oversaw emerging capability gaps and existing requirements.

DHS improved in these areas by ensuring compliance with acquisition documentation, implementing oversight mechanisms to monitor program progress, establishing a recurring process to assess the acquisition workforce, and implementing policies to help the JRC fulfill its roles and responsibilities including building up component requirements capabilities and analyzing and operationalizing requirements.¹²

We monitored DHS's progress in addressing our High-Risk Series acquisition outcomes, in part through our annual assessment of DHS major programs. Since 2015, we have published 10 annual assessments, which included 16 recommendations to DHS and one matter for

¹¹GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to Be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023). DHS remains on our high-risk list in the areas of IT and financial management.

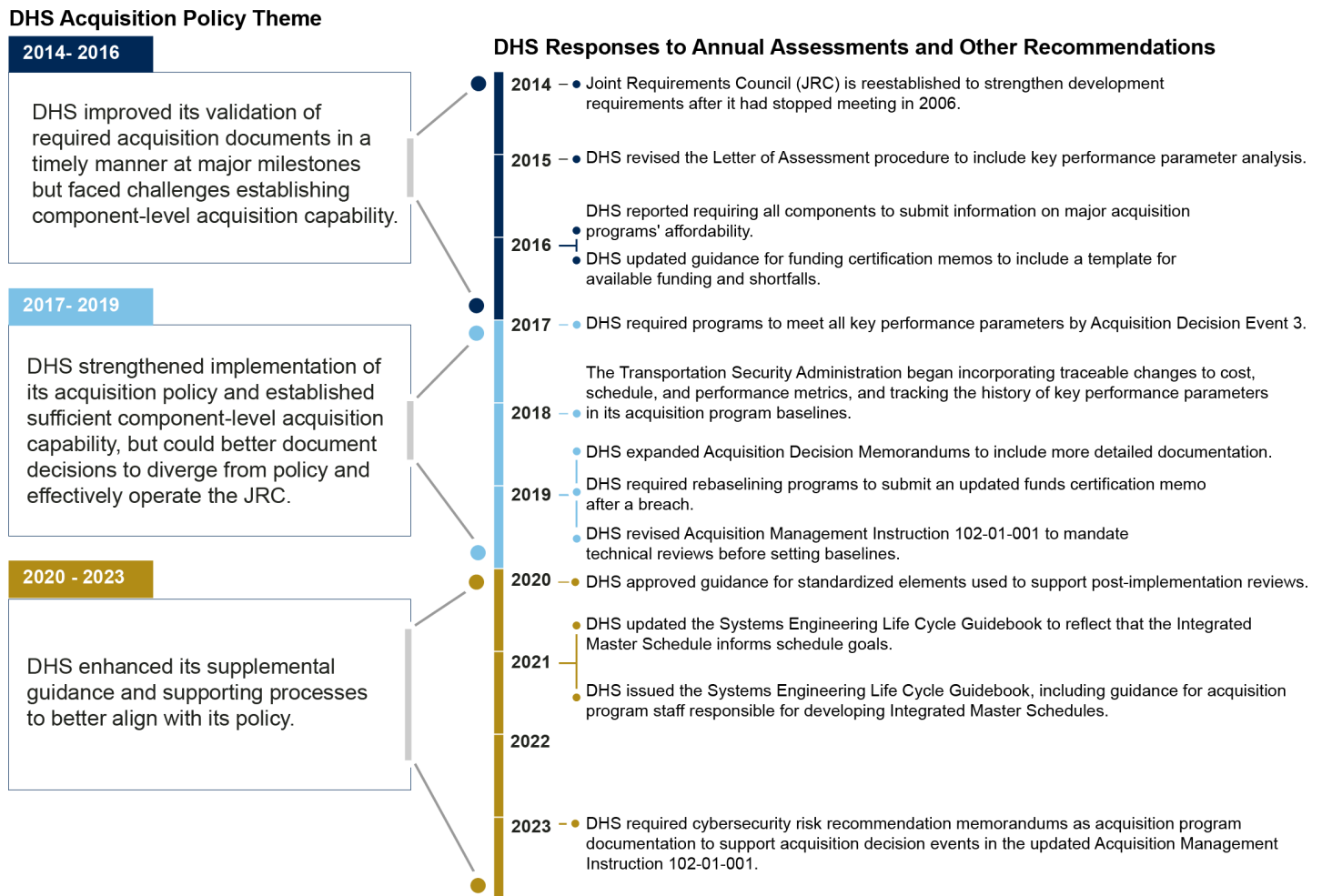
¹²As of August 2024, DHS has suspended the operations and activities of the JRC while it works to craft its new requirements development body, the Capabilities, Analysis, and Requirements Division.

congressional consideration.¹³ The matter and all but one recommendation have been closed as of December 2024. DHS concurred with and is working to close the final open recommendation.

Over the last 10 years, largely in response to prior DHS Annual Assessment recommendations and High-Risk Series efforts, DHS established policies and processes to improve acquisition program management, oversight, and test and evaluation. These policies focused on promoting consistency in how DHS policy is applied across different components, bolstering the application of acquisition policy through well-documented decision-making, and offering guidance to support various processes. Figure 3 provides an overview of acquisition policy changes that DHS made largely in response to our DHS Annual Assessment recommendations from 2014 to 2023.

¹³A list of these and our other related products is provided at the end of this report.

Figure 3: DHS Acquisition Management Policy Themes and Significant Events, 2014-2023



Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107137

Most Programs Are Meeting Revised Goals, but Do Not Consistently Document Baseline Changes

Most programs are meeting their current cost and schedule goals, but since establishing their initial APBs, programs have increased their acquisition costs goals by \$8 billion and experienced schedule delays. Nearly all the programs in our scope have revised their APBs at least once, but several programs have not captured key context, such as the causes of the cost or schedule changes, in their APBs. APB guidance includes instructions for programs to report changes to any cost, schedule or performance metric, and the change to any such metrics in their APBs. In our review, we found that APB guidance does not identify examples of

change drivers, such as breaches, COVID-related updates, administrative updates, and requirements changes, that lead to APB revisions.

Most Programs Are Meeting Goals After Revising Initial Baselines to Account for Cost Growth and Schedule Delays

All but one of the 17 DHS programs with department-approved APBs we reviewed are meeting their current cost and schedule goals. However, except for those programs that established their initial baselines in the past 2 years, each of DHS’s major programs we reviewed revised its APBs at least once. Further, seven programs revised their APBs three or more times. The three programs that established baselines in 2023 or 2024—the MH-60T recovery helicopter, Waterways Commerce Cutter, and Enterprise Data and Analytics Modernization Initiative—were meeting those goals as of September 2024.

The one program with a DHS-approved APB not meeting its current cost and schedule goals is the Coast Guard’s Polar Security Cutter (PSC). The PSC program—which revised its APB twice—declared a breach in fiscal year 2024 and is currently completing breach remediation steps to rebaseline the program sometime in fiscal year 2025, according to officials. See table 2 for additional information on the 17 baselined programs and their goals.

Table 2: DHS’s 17 Baselined Programs and Their Acquisition Program Baseline (APB) Information

Component	Program	Calendar year of initial APB	Calendar year of current APB	Number of APB revisions	Meeting current APB goals?
Cybersecurity and Infrastructure Security Agency (CISA)	Continuous Diagnostics & Mitigation (CDM)	2013	2021	5	Yes
	Next Generation Network Priority Services (NGN-PS) Phase 1	2011	2018	3	Yes
DHS Management Directorate (MGMT)	Homeland Advanced Recognition Technology (HART)	2016	2023	3	Yes
Federal Emergency Management Agency (FEMA)	Enterprise Data and Analytics Modernization Initiative (EDAMI)	2024	2024	0	Yes
	Grants Management Modernization (GMM)	2017	2023	2	Yes
	Integrated Public Alert & Warning System (IPAWS)	2011	2023	6	Yes
Transportation Security Administration (TSA)	Checkpoint Property Screening Program (CPSS)	2020	2021	2	Yes
	Credential Authentication Technology (CAT)	2018	2024	3	Yes

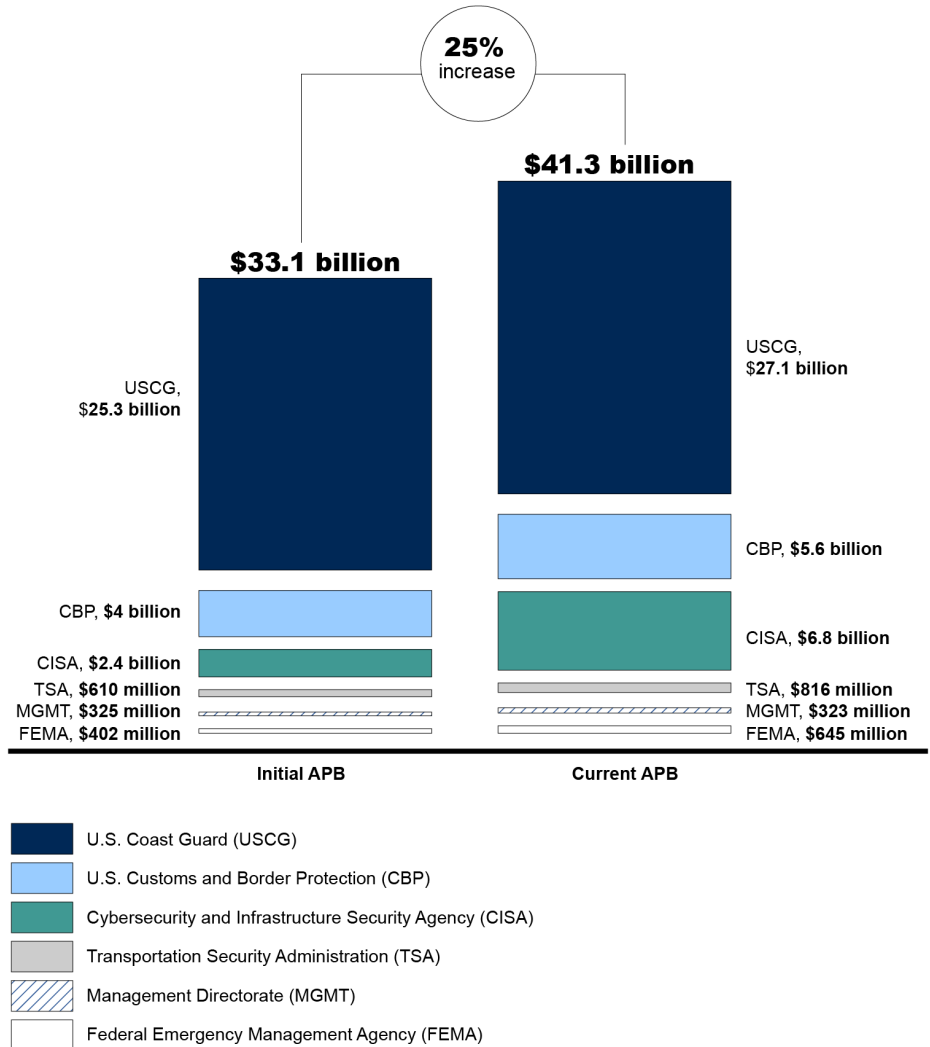
Component	Program	Calendar year of initial APB	Calendar year of current APB	Number of APB revisions	Meeting current APB goals?
U.S. Coast Guard (USCG)	Medium Range Recovery Helicopter (MH-60T) Sustainment Program	2023	2023	0	Yes
	Medium Range Surveillance (MRS) Aircraft (HC-144B & HC-27J)	2016	2022	1	Yes
	Offshore Patrol Cutter (OPC)	2012	2024	3	Yes
	Polar Security Cutter (PSC)	2018	2022	2	No
	Waterways Commerce Cutter (WCC)	2024	2024	0	Yes
U.S. Customs and Border Protection (CBP)	Automated Commercial Environment (ACE)	2004	2024	8	Yes
	Biometric Entry-Exit Program (BE-E)	2018	2019	2	Yes
	Medium Lift Helicopter (MLH)	2016	2022	2	Yes
	Multi-Role Enforcement Aircraft (MEA)	2016	2021	2	Yes

Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

While most programs are meeting their current cost goals, the projected costs for DHS’s 17 baselined programs have collectively increased by approximately \$8 billion since the programs initially established them.¹⁴ Two programs—CISA’s Continuous Diagnostics and Mitigation program and Coast Guard’s OPC program—drive the majority of this cost growth. Those programs represent approximately \$3.9 billion and \$2 billion, respectively, in projected cost growth. The Continuous Diagnostics and Mitigation program experienced cost increases due to the addition of capability requirements after initial goals were set. OPC costs grew because of design instability, awarding a contract to a second shipbuilder, hurricane damage, and increased infrastructure cost. Figure 4 depicts the combined cost growth for the 17 programs with a breachable baseline.

¹⁴To conduct this analysis, for each program, we compared the first APB approved by DHS against the most recent APB approved by DHS. Prior to May 2019, DHS acquisition management policy required programs to establish the first DHS-approved APB with goals that can be breached at ADE 2A. In May 2019, DHS updated its acquisition management policy to require programs to instead establish the first APB with goals that can be breached at ADE 2B.

Figure 4: Acquisition Cost Goals by Component for DHS's 17 Baselined Programs from Initial to Current Baselines (in Fiscal Year 2023 Dollars)



Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

Note: To conduct this analysis, for each program, GAO compared the first acquisition program baseline (APB) approved by DHS against the most recent APB approved by DHS. Prior to May 2019, DHS acquisition management policy required programs to establish the first DHS-approved APB with goals that can be breached at ADE 2A. In May 2019, DHS updated its acquisition management policy to require programs to instead establish the first APB with goals that could be breached at ADE 2B. All numbers presented are in fiscal year 2023 dollars and may not match directly with original APB values.

Similarly, while most programs are meeting their current schedule goals,

many are not meeting their initial goals and have delayed delivery of capabilities. For example:

- The Homeland Advanced Recognition Technology (HART) program, following a series of schedule breaches, exited breach status in October 2023 and is now meeting its new schedule goals. However, HART plans to complete initial operating capability in September 2026, which is 7 years later than originally planned.
- The Coast Guard's OPC program declared a schedule breach in June 2024, exited breach status in August 2024, and is now meeting its new schedule goals. However, the program is now planning for delivery of its lead ship by December 2025, more than 4 years later than originally planned.
- The Coast Guard's PSC program delayed its ADE 2C milestone by over 3 years. In the program's initial APB from 2018, ADE 2C was scheduled to occur in the second half of fiscal year 2021, but according to program officials, ADE 2C is expected to be achieved in the first quarter of fiscal year 2025.

Some Programs Did Not Consistently Provide Key Context for Changes to Acquisition Program Baselines

Multiple programs did not document key historical context in their APBs when they revised them. As previously mentioned, most programs have revised their APBs between one and eight times, but the APBs do not consistently provide DHS decision-makers with key information about why the APB revisions had to be made, especially for older programs. This knowledge would give those decision-makers more robust insights into past program performance and improve the quality of information to manage the program moving forward. We reviewed five program APBs across five components in our scope and found three programs did not consistently track the reasons for revising their APBs in their revision summaries, such as cost or schedule breaches. In contrast, two programs clearly documented the basis for the revisions. See table 3 for additional information.

Table 3: Analysis of Selected DHS Program Acquisition Program Baseline (APB) Revision Summaries

Component	Program	Revision summary description
U.S. Customs and Border Protection (CBP)	Automated Commercial Environment (ACE)	The program’s March 2024 APB describes what changes have occurred across eight revision entries; however, the revision summary does not identify why those changes occurred. For example, despite the program breaching its goals twice, no revision entry clearly identifies changes resulting from a breach.
Transportation Security Administration (TSA)	Credential Authentication Technology (CAT)	The program thoroughly tracked changes and change drivers related to cost, schedule, and performance in its January 2024 APB in all three entries.
Federal Emergency Management Agency (FEMA)	Grants Management Modernization (GMM)	The program’s February 2023 APB tracked both changes and change drivers related to schedule and performance in its most recent revision entry. However, a prior revision entry for the program’s rebaseline in 2020 does not explain if the revision was due to a breach in 2019.
Management Directorate (MGMT)	Homeland Advanced Recognition Technology (HART)	The program’s October 2023 APB tracked both changes and change drivers such as a breach in its most recent revision entry. The prior two revision entries are less clear, one prior entry identifies a rebaseline, but does not explain that the cause of the rebaseline was a breach.
U.S. Coast Guard (USCG)	Offshore Patrol Cutter (OPC)	The program thoroughly tracked changes and change drivers related to cost, schedule, and performance in all three entries in its August 2024 APB, including prior breaches.

Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

Note: For each component, GAO selected the program with the most recently revised DHS-approved APB. GAO only included revised APBs approved after 2021, which is when DHS last updated its APB template. GAO did not review any Cybersecurity and Infrastructure Security Agency programs, as none of its programs in GAO’s scope had a DHS-approved APB after 2021.

DHS’s acquisition management instruction requires that, for tracking purposes, all changes to the program baseline after ADE 2B must be documented in the APB. In addition, DHS PARM’s 2021 APB template guidance states that APB revision tables should be a historical, chronological table that provides, at a minimum, (1) the change to any cost, schedule, or performance metric; and (2) the cause for the change or change driver.

For the three programs we reviewed that did not include key historical context in their APBs, specifically the change driver, two officials stated they either followed DHS’s acquisition policy or guidance when updating their APBs. DHS PARM officials stated that DHS’s acquisition policy and 2021 APB guidance include sufficient information on what a program APB should contain. PARM officials also noted that the acquisition decision memorandum also provides decision-makers with information on a

program's history for management and oversight purposes.¹⁵ However, an APB should provide a consolidated summary of the program, including a history of change drivers. Further, DHS PARM's APB guidance describes the importance of transparency and traceability in the APB itself, stating that the APB provides an official record of information. The guidance further states that APB revision summaries provide program managers the opportunity to inform readers, such as senior DHS acquisition decision-makers and other oversight officials, on what has changed and why. We found, however, that DHS PARM's APB guidance does not specify the types of change drivers that lead to APB revisions that should be included in the revision summary, including breaches, COVID-19-related updates, administrative updates, and requirements changes. Furthermore, federal internal control standards state that an agency should internally communicate necessary quality information to achieve its goals.¹⁶ This includes considering whether information is accessible and readily available to the audience when needed.

Additional guidance regarding the types of change drivers that should be identified in APBs can help to ensure consistent, transparent, and traceable information for program oversight are accessible and readily available in APBs. This would provide readers, such as DHS acquisition decision-makers and oversight entities, with quality information to understand how well programs have been executed over time and help inform oversight decisions, especially for programs with more revisions and longer histories.

Selected DHS Programs Reported the Potential for Further Schedule Delays and Cost Increases

Multiple DHS programs achieved schedule milestones over the last fiscal year; however, over half of the 24 programs we selected indicated that they may experience a future schedule delay as a result of challenges with contractors, funding, staffing, and other factors. In addition, the Coast Guard—which accounts for the majority of estimated acquisition costs for selected DHS major acquisition programs—anticipates it will encounter further cost growth. As of fiscal year 2024, almost half of the programs we selected have met at least one performance goal, while eight have met all key performance parameters.

¹⁵For example, if a program breaches its APB goals, DHS acquisition management policy requires programs to formally notify DHS and component decision-makers. The policy also requires DHS to document the breach in a formal memorandum and approve a breach remediation plan before a program exits breach status.

¹⁶GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014).

Programs Achieved Milestones but Face Schedule Risks Moving Forward

Many programs achieved schedule milestones in fiscal year 2024. Table 4 provides an overview of the milestones completed in fiscal year 2024, and planned milestones for fiscal year 2025.

Table 4: Achieved Milestones in Fiscal Year 2024 and Anticipated Milestones in Fiscal Year 2025 for Selected DHS Programs

Component	Program	Major milestone achieved in fiscal year 2024	Major milestone expected in fiscal year 2025
Cybersecurity and Infrastructure Security Agency (CISA)	Continuous Diagnostics and Mitigation (CDM)	—	—
	Cyber Analytic and Data System (CADS)	Acquisition Decision Event (ADE) R1 ^a September 2024	—
	Next Generation Network Priority Services (NGN-PS) Phase 1	—	ADE 3 (increment 3)
	NGN-PS Phase 2	—	—
DHS Management Directorate (MGMT)	Homeland Advanced Recognition Technology (HART)	—	—
Federal Emergency Management Agency (FEMA)	Enterprise Data and Analytics Modernization Initiative (EDAMI)	ADE 2B	—
	Grants Management Modernization (GMM)	Full Operational Capability (FOC) May 2024	Post Implementation Review
	Integrated Public Alert and Warning System (IPAWS)	—	—
Transportation Security Administration (TSA)	Checkpoint Property Screening System (CPSS)	—	Rebaseline Increment 1: increase increment quantities and extend increment duration
	Credential Authentication Technology (CAT)	ADE 3 (CAT-2 production) May 2024	—
U.S. Coast Guard (USCG)	Medium Range Recovery Helicopter (MH-60T)	Initial Operational Capability (IOC) Increment 1 August 2024	IOC (Increment 2)
	Medium Range Surveillance (MRS) Aircraft (HC-144B, HC-27J)	FOC (HC-144B)	—
	Offshore Patrol Cutter (OPC)	Combined ADE 2B/2C August 2024	—
	Polar Security Cutter (PSC)	—	ADE 2C
	Waterways Commerce Cutter (WCC)	ADE 2B (segment 1) May 2024	—

Component	Program	Major milestone achieved in fiscal year 2024	Major milestone expected in fiscal year 2025
U.S. Customs and Border Protection (CBP)	Automated Commercial Environment (ACE)	Declared FOC (Collections) September 2024	ADE 3
	Biometric Entry-Exit Program (BE-E)	—	—
	Common Operating Picture (COP)	—	ADE 2A
	Cross Border Tunnel Threat (CBTT)	ADE 2A (Mobile Detection Tunnel Toolkit) February 2024	ADE 2B (CBTT)
	Integrated Surveillance Towers (IST)	—	—
	Light Enforcement Platform (LEP)	ADE 2A December 2023	ADE 2B
	Medium Lift Helicopter (MLH)	—	—
	Multi-Role Enforcement Aircraft (MEA)	—	ADE 2B (land interdiction)
	Non-Intrusive Inspection Integration Program (NII-I)	—	—

— = not applicable

Source: GAO analysis of Department of Homeland Security (DHS) data. | GAO-25-107317

Note: Information in the table is from a mixture of program-reported information, interviews, and program documentation.

^aADE R1 under the Rapid Acquisition Life Cycle Framework approximates ADE 2B of the standard acquisition life-cycle framework under DHS Acquisition Management Instruction 102-01-001.

However, over half of selected programs (15 of 24) face schedule risks moving forward, including multiple Coast Guard and U.S. Customs and Border Protection (CBP) programs.

Two Coast Guard programs declared schedule breaches in fiscal year 2024 that will affect their schedules moving forward, while another Coast Guard program faces significant schedule uncertainty given cancellation of a segment. Specifically:

- **OPC** declared a breach in June 2024. OPC officials determined it was not possible to meet schedule goals for its Stage 1 initial test and evaluation and initial operational capability by March 2026. They elected to shift the Stage 1 testing events to hull 2 due to various design changes that made hull 2 more representative of the class. The program has since revised its APB to incorporate new schedule goals. However, the program continues to face schedule risks as the

Stage 1 contractor has yet to complete its review of costs and schedules for multiple ships to inform the program's schedule.¹⁷

- **PSC** indicated it would breach its cost and schedule baseline in November 2023. PSC officials stated the program will not meet upcoming milestone dates and that the contract with the program's prime contractor is not commercially practicable and requires restructuring. These officials stated they are currently completing remediation steps, but explained that efforts are dependent on each other. For example, revising cost and schedule goals in the APB depends on resolving contract renegotiations, and if negotiations are delayed, this could further delay their schedule.¹⁸
- **The Medium Range Surveillance Aircraft (MRS)** program discontinued its HC-27J modernization effort. After the program did not receive procurement, construction and improvements funding in fiscal year 2024, the Coast Guard stopped modernizing the aircraft for Coast Guard use. MRS program officials expect to end the HC-27J segment by the end of fiscal year 2028, but full operational capability for the program is now uncertain as the Coast Guard explores options for replacing the HC-27J segment.

In addition, another 12 programs identified schedule risks moving forward, including all CBP programs. Program officials cited several causes of potential schedule delays. Those causes included:

- **Funding constraints.** Program officials for six of these 12 programs identified funding challenges as a schedule risk. For example, officials from two CBP programs explained they received no acquisition funding in fiscal year 2024 and officials from another CBP program said they only received funding late into fiscal year 2024. Some program officials stated their schedules are currently paused and will be reevaluated in fiscal year 2025, with potential schedule delays. Additional programs across components also identified funding as a primary risk.
- **Staffing shortfalls.** One CBP program delayed its ADE 2B event twice due to staffing shortfalls. Currently, the deputy director of the directorate under which the program resides is filling in as acting

¹⁷For more information on OPC and previously reported risks, see GAO, *Coast Guard Acquisitions: Offshore Patrol Cutter Program Needs to Mature Technology and Design*, [GAO-23-105805](#) (Washington, D.C.: June 20, 2023).

¹⁸For more information on PSC and previously reported risks, see GAO, *Coast Guard Acquisitions: Polar Security Cutter Needs to Stabilize Design Before Starting Construction and Improve Schedule Oversight*, [GAO-23-105949](#) (Washington, D.C.: July 27, 2023).

program manager to help generate the required acquisition documents needed to achieve ADE 2B. Program officials clarified it is not normal for someone that senior to be filling in as program manager. Program officials explained they have hired the necessary personnel; however, it will take some time to fully train them and transfer responsibilities.

- **Other factors outside of programs' control.** A CBP program official explained that program equipment experienced vandalism at an undisclosed site, which required the program to contract out physical security.¹⁹ Program officials for a different CBP aviation program identified the potential for a 6-month schedule delay due to a Federal Aviation Administration's certification. The program recently realized this risk and program officials delayed their ADE 2B half a year to fiscal year 2025.

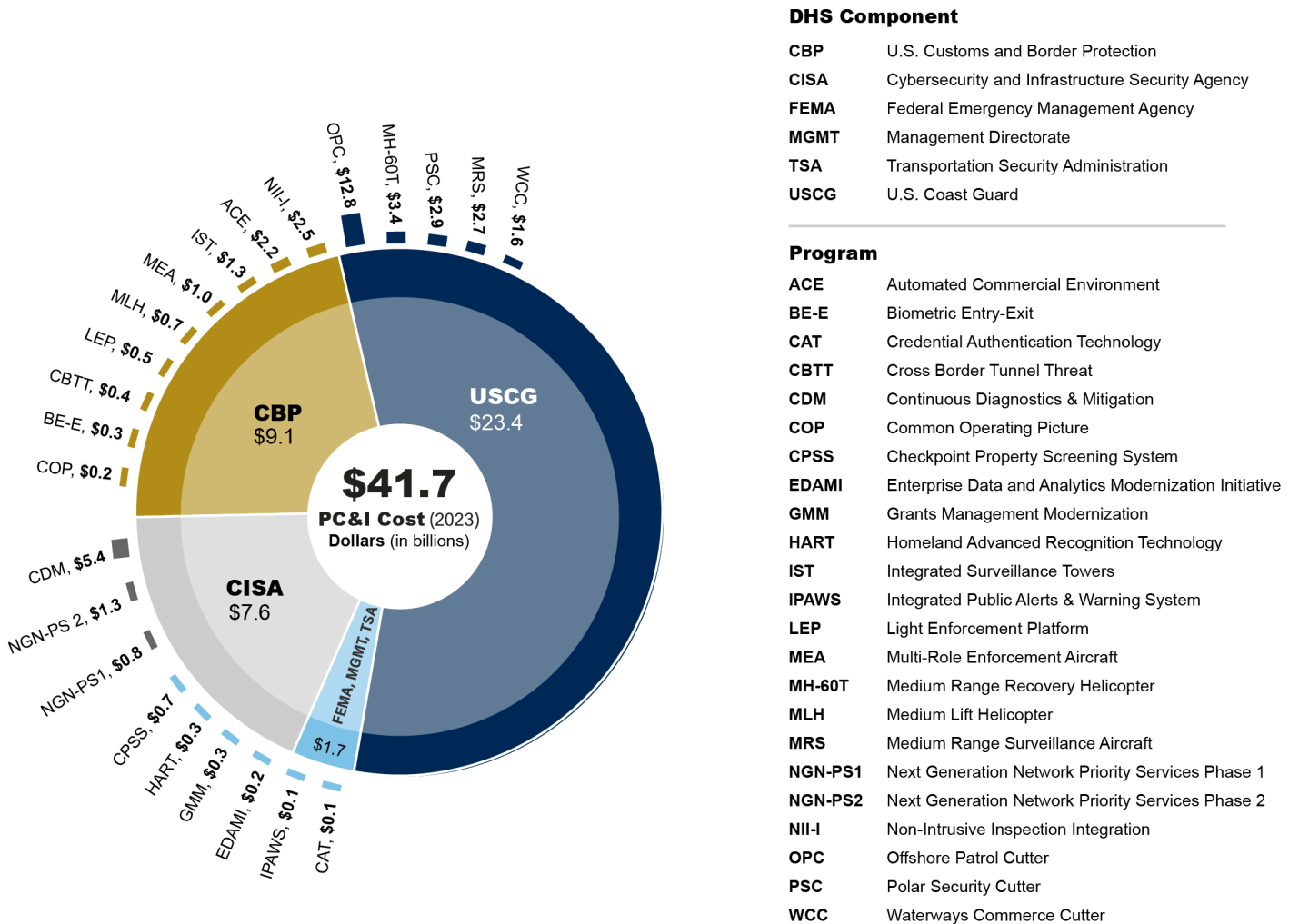
Coast Guard Accounts for Over Half of All DHS Estimated Acquisition Costs and Drives Cost Risk for the Portfolio

Total estimated acquisition costs for 23 of the 24 DHS major programs we selected were nearly \$42 billion as of fiscal year 2024.²⁰ These estimates include acquisition costs over the lifecycle of a program, which may cover decades. Coast Guard acquisitions accounted for 56 percent of that estimated total, with one Coast Guard program—OPC—accounting for about 31 percent. Figure 5 groups the 23 programs by their responsible components and identifies the estimated acquisition costs for each program, the total acquisition costs for each component, and the DHS total.

¹⁹Cross Border Tunnel Threat program officials explained that within one of the highest trafficked areas of the Southwest border, smugglers deliberately vandalized the power connection area of an installation site. Officials added they had not previously experienced physical security issues at this site.

²⁰Of the 24 DHS programs in our scope, we included the 23 programs with an approved life-cycle cost estimate. We excluded from our analysis one program that did not have an approved life-cycle cost estimate.

Figure 5: Estimated Acquisition Costs for Selected DHS Major Acquisition Programs as of September 30, 2024



Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

Note: Programs included in this analysis were those with an approved life-cycle cost estimate in GAO's scope. Programs develop a life-cycle cost estimate to support Acquisition Decision Event 2A before they have an approved initial acquisition program baseline. GAO excluded the Cyber Analytics and Data System (CADS) program from this analysis because it did not have an approved estimate. For some programs in this analysis, estimated costs include amounts for multiple segments, some of which are preliminary. All values presented are in fiscal year 2023 dollars, which may not match values presented in other DHS documentation.

The total estimated acquisition costs for the DHS portfolio are likely to increase in 2025 as a result of the Coast Guard's PSC and OPC programs. The PSC program notified DHS it would breach in November 2023, and anticipates having a new revised APB in fiscal year 2025. In

August 2024, the Congressional Budget Office estimated the acquisition cost of the PSC program to be about \$5 billion, which is approximately \$2 billion more than the program’s current cost estimate. Similarly, the OPC program’s estimated costs are at risk of increasing. DHS determined that the OPC’s most recent cost estimate does not fully reflect the current status of the program, including new contractor data showing higher estimated costs at completion and less efficient contractor performance.

Further, we found that a portion of the acquisition costs already incurred by the department will not result in usable capabilities. As previously mentioned, Coast Guard program officials said the discontinued MRS HC-27J modernization effort produced four almost fully modernized aircraft that would not be used by the Coast Guard. Program officials estimated the sunk acquisition cost of this effort to be \$362 million.²¹

Eleven Programs Met at Least One Performance Goal with Eight Meeting All Goals

As of fiscal year 2024, eight programs demonstrated through testing that they can meet all of their performance goals, also known as KPPs. Another three demonstrated at least one KPP. Of the remaining 13 programs, most have not yet started KPP testing. Table 5 lists the programs that have conducted testing and their test and evaluation status.

Table 5: Status of DHS Programs That Have Met At Least One Key Performance Parameter (KPP) as of September 2024

Component	Program	Completed operational test and evaluation	Program has met at least one KPP	Program has met all KPPs
Federal Emergency Management Agency (FEMA)	Grants Management Modernization (GMM)	✓	✓	✓
	Integrated Public Alert & Warning System (IPAWS)	✓	✓	✓
Transportation Security Administration (TSA)	Checkpoint Property Screening System (CPSS)	✓	✓	✓
	Credential Authentication Technology (CAT)	✓	✓	✓
Cybersecurity and Infrastructure Security Agency (CISA)	Next Generation Network Priority Services (NGN-PS) Phase 1	—	✓	—
U.S. Coast Guard (USCG)	Medium Range Recovery Helicopter (MH-60T) ^a	—	✓	✓
	Medium Range Surveillance Aircraft (MRS) ^b	—	✓	—

²¹Sunk (or past) cost represents money already spent in prior years.

Component	Program	Completed operational test and evaluation	Program has met at least one KPP	Program has met all KPPs
U.S. Customs and Border Protection (CBP)	Automated Commercial Environment (ACE)	✓	✓	✓
	Biometric Entry-Exit (BE-E)	—	✓	✓
	Medium Lift Helicopter (MLH) ^c	—	✓	✓
	Multi-Role Enforcement Aircraft (MEA)	—	✓	—

Legend: ✓ = yes; — = no

Source: GAO analysis of Department of Homeland Security (DHS) information. | GAO-25-107317

^aOperational test and evaluation for MH-60T was planned for discrete segments 1-4, but was not completed. For current MH-60T increments, no effectiveness or suitability testing is planned, as no new capabilities have been identified.

^bThe HC-144 segment of the MRS program completed operational assessment. However, due to the HC-27J discontinuation, the MRS program will not have a path to fully complete operational test and evaluation.

^cOperational test and evaluation for MLH was not conducted within DHS. CBP Air and Marine Operations testing in 2021 included KPP results.

DHS Has Opportunities to Further Improve Its Acquisition Management

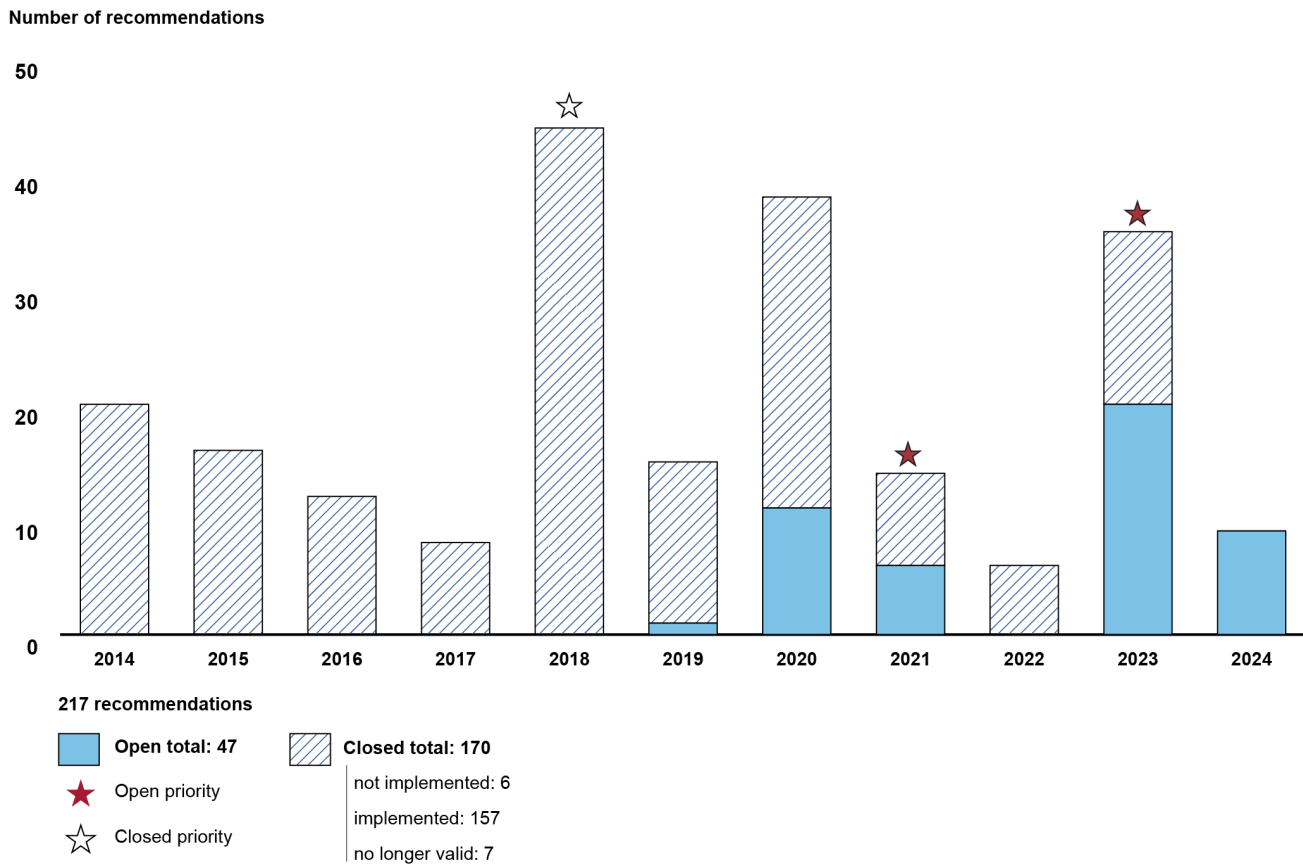
As noted earlier, DHS improved acquisition management and oversight over the past 10 years by establishing policies for consistency, improving decision-making documentation, and providing supportive guidance for various processes. To further improve acquisition management, DHS can address our open recommendations, including those we have identified as priority or recently made. In addition, our prior work on DHS's requirements development process and leading practices for product development can inform DHS's acquisition efforts moving forward.

Since 2014, we have made about 220 recommendations aimed at improving DHS acquisitions and major acquisition program policies and processes, including 16 recommendations from our annual assessments. As of December 2024, DHS had addressed 170 recommendations, but has not yet fully addressed 47 recommendations.²² Figure 6 shows the distribution of both closed and open recommendations we have made to DHS concerning acquisition management policy since 2014.²³

²²Of those open recommendations, three are directed to PARM, while others are directed at components and other offices, such as the U.S. Coast Guard and the Office of the Chief Procurement Officer. For a full list of the open recommendations included in this analysis, see appendix IV.

²³All current open GAO recommendations to DHS can be found on the [GAO website](#).

Figure 6: Implementation Status of GAO’s Acquisition Management Recommendations to DHS, 2014 to 2024



Source: GAO. | GAO-25-107317

Our open recommendations include four recommendations that we believe warrant priority attention from DHS.²⁴ For example, in 2023, we made two priority recommendations to DHS and the Coast Guard respectively to ensure that the OPC and PSC programs have sufficiently

²⁴Priority recommendations are those that upon agency implementation, may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue. See GAO, *Priority Open Recommendations: Department of Homeland Security*, [GAO-24-107251](#) (Washington, D.C.: Aug. 19, 2024).

stable and mature designs prior to starting lead ship construction.²⁵ DHS agreed with one recommendation and the Coast Guard disagreed with the other. Implementing these recommendations can help DHS and the Coast Guard avoid costly rework and further delays on these programs.

In addition, we have several open recommendations to DHS from our recent reports that highlight key areas for improvement. For example, in December 2024, we made four recommendations to DHS to improve how it manages its acquisition workforce—key personnel who develop, acquire, and sustain technologies to help DHS accomplish its mission. These recommendations included assessing whether DHS’s mitigation efforts address challenges facing the acquisition workforce and collecting comprehensive data on its acquisition workforce.²⁶ DHS did not agree with three of our four recommendations. However, we maintain that implementing these recommendations can help DHS attract, maintain, and grow its workforce.

Furthermore, while we closed recommendations in two recent reports on the Joint Requirements Council (JRC) and on leading practices for product development, this prior work can continue to inform how the department manages its acquisitions.

- First, in August 2023, we found that while the JRC and its requirements development process had improved, operational effectiveness was limited due to lack of leadership support and workforce challenges. We made six recommendations to address these issues, some of which could potentially reduce duplication, overlap, and fragmentation.²⁷ However, in August 2024, DHS suspended JRC operations and related policies in response to the joint explanatory statement accompanying the Further Consolidated

²⁵GAO, *Coast Guard Acquisitions: Polar Security Cutter Needs to Stabilize Design Before Starting Construction and Improve Schedule Oversight*, [GAO-23-105949](#) (Washington, D.C.: July 27, 2023) and *Coast Guard Acquisitions: Offshore Patrol Cutter Program Needs to Mature Technology and Design*, [GAO-23-105805](#) (Washington, D.C.: June 20, 2023).

²⁶GAO, *Homeland Security: Actions Needed to Address Acquisition Workforce Challenges and Data*, [GAO-25-107075](#) (Washington, D.C.: Dec. 12, 2024).

²⁷GAO, *Homeland Security: Joint Requirements Council Needs Leadership Attention to Improve Effectiveness*, [GAO-23-106125](#) (Washington, D.C.: Aug. 30, 2023); and *2024 Annual Report: Additional Opportunities to Reduce Fragmentation, Overlap, and Duplication and Achieve Billions of Dollars in Financial Benefits*, [GAO-24-106915](#) (Washington, D.C.: May 15, 2024).

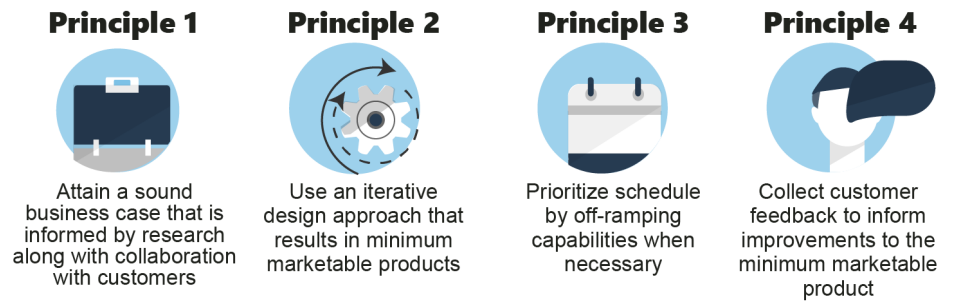
Appropriations Act, 2024, which instructed DHS to dissolve the JRC.²⁸ While the underlying principles of our findings in the August 2023 report remain important—ensuring a requirements development body is appropriately resourced and positioned to assess potential duplication of requirements—we closed the recommendations as no longer valid because the organization they were aimed at was dissolved.

To replace the JRC, DHS began crafting a new requirements development process that DHS officials said will be managed by the Capabilities, Analysis, and Requirements Division within PARM. In addition, DHS components are planned to have a significant role in the new process and be responsible for managing their own capability gap identification process. As of October 2024, DHS officials said they were still in the process of developing policies for this new process. When asked how the process would account for joint requirements, DHS officials told us they did not anticipate that would be a focus because DHS has not had many joint requirements in the past. As noted earlier, in April 2023, we removed DHS acquisition management from our High-Risk Series in part because the department had the JRC which oversaw emerging capability gaps and existing requirements. We will continue to monitor DHS's efforts in developing its requirements process.

- Second, in 2022, we found that leading companies take a disciplined approach to develop innovative products that satisfy their customers' needs, and to deliver them to market on time and within planned costs. Based on this work, we identified four key principles that leading companies use for product development (see fig. 7).

²⁸170 Cong. Rec. H1501, H1807 (Mar. 22, 2024) (joint explanatory statement to the Further Consolidated Appropriations Act, 2024, div. C, Dept. of Homeland Security Appropriations Act, 2024).

Figure 7: Leading Companies Use Four Key Principles for Successful Product Development



Source: GAO summary of company information. | GAO-25-107317

As part of that review, we found that DHS acquisition policies did not fully implement all of these leading principles and made recommendations.²⁹ In 2023 and 2024, DHS addressed all of these recommendations and we closed them as implemented. Our prior work demonstrates that leading approaches from the private sector can be thoughtfully applied to government acquisition to improve outcomes. A greater use of acquisition leading practices by DHS has resulted in cost avoidance savings and overall improved outcomes. It is too soon to tell the extent to which individual DHS major acquisition programs have adopted these leading practices. We will continue to monitor DHS's efforts in this area.

Conclusion

DHS has and will continue to invest tens of billions of dollars in major acquisition programs to safeguard the United States and its citizens. These programs require DHS to work across multiple components—like the Coast Guard, Transportation Security Administration, and Customs and Border Protection—to develop, test, and deploy an array of systems and capabilities over the coming decades. A key aspect to those programs' success—and the greater DHS mission—is that programs meet their established baseline cost, schedule, and performance goals.

Events have and will continue to occur—that are or are not within a program's control—that require revisions to baseline goals. Given the number of programs that have revised their baselines multiple times, and the resulting cost growth and delays to delivering capabilities, it is important that guidance around documenting these revisions over time is specific and unambiguous. Current guidance from DHS PARM emphasizes the importance of tracking changes and change drivers when

²⁹GAO, *Leading Practices: Agency Acquisition Policies Could Better Implement Key Product Development Principles*, [GAO-22-104513](#) (Washington, D.C.: Mar. 10, 2022).

revising baselines. However, this guidance can go a step further in providing specificity on what those change drivers include, such as breaches or requirements updates. Ensuring programs specify this information in acquisition program baselines would make key program information more accessible and available to DHS decision-makers and oversight entities as programs progress.

Recommendation for Executive Action

The Secretary of DHS should ensure that the Director of PARM updates its acquisition guidance to specify that Acquisition Program Baselines for DHS's major acquisition programs clearly document the context behind key program changes, such as revisions to cost and schedule parameters and the reasons for such revisions (e.g., breaches, COVID-19-related updates, administrative updates, or requirements changes).

Agency Comments

We provided a draft of this report to DHS for review and comment. In its comments, reproduced in appendix III, DHS agreed with the recommendation and indicated that the department planned to implement it by May 30, 2025. DHS also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, the report will be made 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) 512-4841 or masterst@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.



Travis J. Masters
Director, Contracting and National Security Acquisitions

List of Committees

The Honorable Rand Paul, M.D.
Chairman
The Honorable Gary C. Peters
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Katie Britt
Chair
The Honorable Chris Murphy
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Subcommittee on Homeland Security
Committee on Appropriations
United States Senate

The Honorable Mark E. Green, M.D.
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The Honorable Bennie Thompson
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Committee on Homeland Security
House of Representatives

The Honorable Mark Amodei
Chairman
The Honorable Lauren Underwood
Acting Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
House of Representatives

Appendix I: Program Assessments

This appendix presents individual assessments for the 24 Department of Homeland Security (DHS) major acquisition programs we reviewed. Each assessment presents information that is current as of September 2024. The assessments include standard elements such as: an image, a program description, summaries of the program's progress in meeting cost and schedule goals, and key program information such as its contracting approach. In addition, the assessments provide summaries of the program execution, performance and testing activities, and program management-related issues, as applicable.

The information presented in these assessments was obtained from DHS documentation, answers to our questionnaire by DHS officials, and interviews with DHS and program officials. It also includes our analysis of program information. Assessments are 2 pages in length, with exceptions for programs that met full operational capability (FOC) after audit initiation, were pre-acquisition decision event (ADE) 2A at audit initiation, or are new to this year's report. Each assessment includes the following elements:

- **Program description.**
- **Program information:**
 - **Component.** Which of the six components in our scope the program falls under.
 - **Acquisition type.** Whether a capital asset program is for an IT acquisition as defined by DHS, a non-IT acquisition, or a mixed acquisition that includes IT and non-IT.
 - **Acquisition level.** Whether a program is level 1 (has a life-cycle cost estimate (LCCE) of \$1 billion or more) or level 2 (LCCE is from \$300 million to less than \$1 billion).
 - **Key performance parameters (KPP).** Provides the breakout of the program's current total number of KPPs by whether the programs reported those KPPs as met. If testing for the program's KPPs has not begun, that is stated.
 - **Prime contractor, number of prime contractors, or servicing agency.** Names the program's prime contractor(s), or gives the number of prime contractors if there are more than five. For programs using another federal agency to acquire products or services, names the service or office that does so. For this field, we used information from the program as well as independently

reviewed Federal Procurement Data System data and other information.

- **Contracting approach.** Includes high-level information and summaries of the kind of contracting activities the program is conducting or planning. For this field, we used information from the program as well as independently reviewed Federal Procurement Data System data and other information.
- **Life-cycle path:** Indicates which tailoring path of the Systems Engineering Life Cycle Framework, per DHS Instruction 102-01-103, the program uses. These include:
 - Incremental software development: designed for IT programs with software development elements that deliver capabilities in increments.
 - System/Product Development: addresses tailoring for large and small product development projects that require significant developmental or engineering effort.
 - Commercial-Off-The-Shelf/Non-Developmental Items with No Integration Required: addresses self-contained hardware or software items that provide needed functionality (e.g., system capability) as-is, without modifications.
 - Commercial-Off-The-Shelf/Non-Developmental Items with Integration: addresses the integration of Commercial-Off-The-Shelf or Non-Developmental Items with existing or legacy hardware or software, or other Commercial-Off-The-Shelf or Non-Developmental Items as part of a larger system.
 - Facilities/Construction: though similar to the acquisition and development of systems, includes processes and approaches unique to the acquisition and construction of facilities.
 - Rapid Acquisition: addresses the acquisition of mature capabilities in an expedited manner.
- **Next major milestone.** Indicates the program's next major event along with the estimated date, if known.
- **Key Findings.**
- **Graphics:**
 - **Schedule.** This figure consists of a timeline that identifies key acquisition decision events or other significant events for the program. The timeline identifies when the program completed or is expected to reach its major milestones as of September 2024.

Dates shown are based on the program's acquisition program baseline (APB) threshold dates, a signed acquisition decision memo showing completion of an event, or updates provided by the program office. The following milestones are intended to signify:

- ADE 2A: when a program, or increment, enters into the obtain phase of the acquisition life cycle
- ADE 2B: when a program's initial acquisition program baseline is approved
- ADE 2C: when low-rate production, or incremental delivery, is approved
- ADE 3: when full-rate production, or deployment, is approved
- IOC: initial operational capability
- FOC: full operational capability
- **Acquisition program baseline and current estimate.** This figure compares the program's cost thresholds from the initial APB approved after DHS's acquisition management policy went into effect in November 2008 and the program's current DHS-approved APB to the program's expected costs as of September 2024. The source for the current estimate is DHS Cost Analysis Division data. Costs shown are based on the program's APB threshold costs and are presented in normalized fiscal year 2023 dollars. For consistency in reporting, we use the terms procurement, construction and improvements (PC&I) or acquisitions when describing costs in these assessments.
- **Selected milestone delay.** This figure compares the program's initial date for a selected milestone to its current estimated date for that milestone in months.

Lastly, each program assessment summarizes comments provided by the program office and identifies whether the program provided technical comments.

Programs are grouped by component to provide consistency in reporting and ease of use for the reader.

Cybersecurity and **Infrastructure Security Agency**





Source: CISA. | GAO-25-107317

Continuous Diagnostics and Mitigation

CDM aims to strengthen the cybersecurity of civilian government networks and data by providing four capabilities to federal agencies: (1) Asset Management reports vulnerabilities in hardware and software; (2) Identity and Access Management focuses on user access controls; (3) Network Security Management will report on efforts to prevent attacks; and (4) Data Protection Management will provide encryption to protect network data. Under CDM, DHS centrally oversees the procurement of cybersecurity tools that can be deployed by participating agencies. CDM is organized into segments for each capability.



Program Information

Component: Cybersecurity and Infrastructure Security Agency (CISA)

Acquisition Type: IT

Acquisition Level: 1

Key Performance Parameters: Testing of 16 KPPs began in summer 2024.

Servicing Agencies: General Services Administration and Federal Acquisition Service

Contracting approach: CDM obtains services from a series of competitively awarded task orders against existing Multiple Award Schedule or government-wide acquisition contracts.

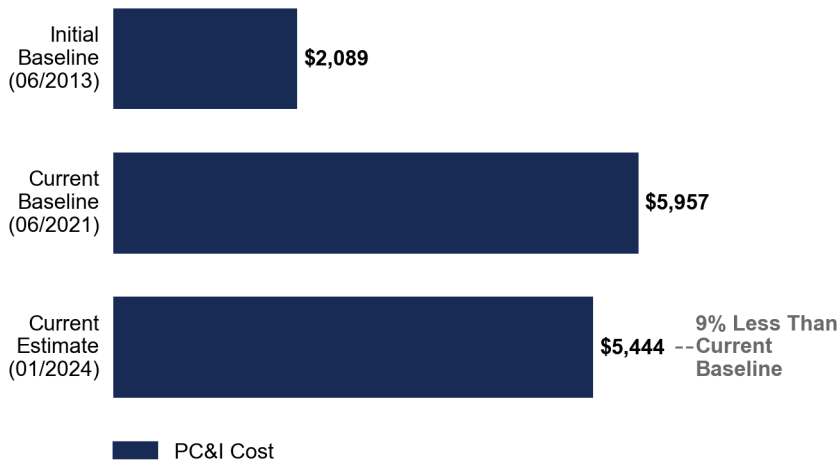
Life-cycle path: Commercial Off-the-Shelf/Non-Developmental Item with Integration

Next major milestone: ADE 3 by August 2026

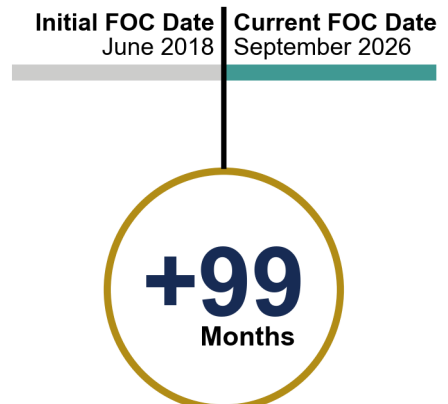
Key Findings

- **Cost and Schedule.** CDM is updating its APB to include a new full operational capability definition and streamlined KPPs to support that new goal. Program officials plan to complete the update by March 2025 and do not expect this to change existing baseline cost and schedule goals. CDM's estimated acquisition costs are currently \$5.4 billion, remaining within the program's current cost baseline.
- **Performance and Testing.** Testing of KPPs for the Asset Management capability on DHS networks began in summer 2024. CDM remains limited in its ability to demonstrate KPPs because it cannot conduct operational testing on other agencies' networks without agency permission. As of September 2024, no external agencies have granted access to their networks for testing purposes.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



Note: new program capabilities were added after the original milestone date was set.

CONTINUOUS DIAGNOSTICS AND MITIGATION

Program History and Acquisition Strategy

The CDM program established an initial baseline in 2013 and has revised it five times since then, for reasons such as adding new capabilities or expanding prior ones. The program achieved IOC for the Asset Management capability in 2016 and the Identity and Access Management capability in 2019. Work on the Data Protection Management capability was paused in 2022 to focus on changing cybersecurity priorities stemming from legislation passed in 2021 and an executive order. We reported on the CDM program in August 2020 ([GAO-20-598](#)) and made six recommendations to DHS, among others. These recommendations included ensuring various agency systems could integrate with CDM capabilities and were closed as implemented by April 2024.

Cost and Schedule Status

CDM is on track to achieve FOC in 2026. However, program officials stated they are revising the definition of FOC in the program baseline to address (1) a greater focus on the operational realities of how the CDM dashboard operates and is used, and (2) agency priorities on data collected. Program officials added that they do not anticipate changes to cost and schedule baselines. These officials expect the update to be completed by March 2025, after an October 2024 DHS-level review of the program. They also explained that the future of the Data Protection Management capability, paused since 2022, was under discussion as part of the new definition of FOC.

In January 2024, CDM updated its planned program life-cycle cost estimate to \$5.4 billion. The Network Security Management and Asset Management capabilities have the most planned acquisition costs, accounting for 32 percent and 28 percent of program costs, respectively. The Identity and Access Management and Data Protection Management capabilities accounted for 17 percent and 12 percent, respectively. Dashboard costs make up most of the remaining expenses.

Performance and Testing

While the program achieved IOC for two capabilities in 2016 and 2019, the program has yet to successfully demonstrate that it has met any KPPs because of testing limitations. CISA officials said that the program cannot conduct operational testing of its capabilities on other agencies' networks without permission. This limits the program's ability to test KPPs and demonstrate that the KPPs are met.

Program officials stated that, as of September 2024, the program did not have permission from any agency to conduct operational testing. Program officials also stated that if CDM cannot gain access to agency networks for testing purposes, the agencies will assume responsibility for testing CDM-provided capabilities on their own networks. However, according to CISA officials, there is no set timeline for that responsibility to switch from CDM to the agencies. CISA officials previously reported that in lieu of formal testing, some agencies conducted

operational studies that provided informal observations on CDM implementation.

Program officials said that the program started testing KPPs related to the Asset Management capability in summer 2024. This testing took place on DHS networks.

Program officials said that once they finish revising the FOC definition, the program's KPPs will be streamlined to support the new definition. The Asset Management KPPs being tested are unlikely to change because of the planned streamlining, according to CISA officials.

Program Management

One of the top program risks is external agencies making changes to CDM-provided tools without coordinating with the CDM program. Program officials explained that when this happens it increases program costs and can affect operational data, as systems are no longer properly configured, resulting in increased work for the program. Program officials said this was most concerning for the Asset Management capability and Endpoint Detection and Response sub-capability.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. The CDM program stated that efforts will continue to make CDM an indispensable tool for cybersecurity operations, both in CISA and with partner agencies.

Cyber Analytic and Data System

CADS is composed of IT infrastructure and a digital environment for integrating and analyzing multiple data sets. Specifically, it is expected to provide the tools and capabilities required to support the detection, rapid identification, mitigation, and prevention of malicious cyber activity across CISA. The CADS program is building on capabilities originally developed under CISA's National Cybersecurity Protection System program, which was declared a legacy program in July 2023.

Source: NCPS. | GAO-25-107317



09/24
ADE-R1



09/24
GAO review



09/25
ADE-R2

Program Information

Component: Cybersecurity and Infrastructure Security Agency (CISA)

Acquisition Type: IT

Acquisition Level: 1

Key Performance Parameters: 4 KPPs established, operational testing to begin in 2025.

Prime contractor: Raytheon for development, operations, and maintenance

Contracting approach: The CADS program office reported managing 27 contracts. According to program officials, CADS is using a form of Agile software development that allows it to integrate commercial-off-the-shelf capabilities iteratively.

Life-cycle path: Rapid Acquisition

Next major milestone: ADE-R2 (produce/deploy/support and dispose phase) by September 2025

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. The program will continue to work with the Office of Program Accountability and Risk Management and the CISA Chief Acquisition Executive to ensure that it follows DHS guidance for leveraging the rapid acquisition framework as it works toward the next acquisition decision event.

Current Status

In July 2023, DHS approved CISA's request to restructure its system for cyber intrusion detection and prevention, analytics, and information sharing. This restructuring formally established CADS as a rapid acquisition program under the rapid acquisition framework established in 2020. DHS cited the maturity and commercial availability of the technology as key factors in this decision.

The first major acquisition decision event in the rapid acquisition framework, known as R1, establishes CADS cost and schedule parameters as part of the preliminary acquisition program baseline.

CADS planned to reach R1 and enter the obtain phase of the rapid acquisition life-cycle framework in April 2024, but this date changed to September 2024. Program officials attribute this schedule slip to CADS being the first major acquisition program to use the rapid acquisition framework.

As of September 2024, CADS is estimating a total PC&I cost of approximately \$2.1 billion. This estimate is over \$1 billion more than the program estimated in June 2023, largely due to an increase in anticipated infrastructure and engineering costs. CADS plans to reach the R2 milestone—or production through disposal—by September 2025.

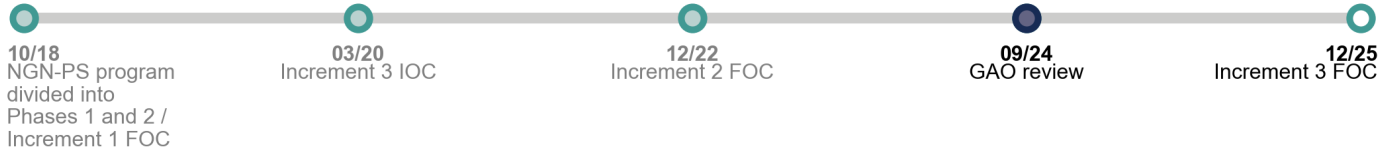
CADS also finalized its test and evaluation strategy in September 2024, which established the program's key performance parameters and testing plans. CADS plans to use a continuous testing methodology that focuses on small, rapid operational testing events to better align with its contracting approach of Agile software development. According to program officials, they are not planning operational test events for fiscal year 2024 but they are expecting two operational assessments in fiscal year 2025.

Next Generation Network Priority Services Phase 1

NGN-PS is a multi-phased program that aims to enhance emergency telecommunications services to ensure public safety personnel can communicate during emergency response and recovery operations. Phase 1 consists of three increments that are developing and deploying priority voice access on: (1) internet protocol core networks; (2) wireless and secure mobile communications over internet protocol; and (3) wired capability over internet protocol. All three increments of Phase 1 are covered in this assessment.



Source: DHS. | GAO-25-107317.



Program Information

Component: Cybersecurity and Infrastructure Security Agency (CISA)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: 5 out of 6 KPPs met; testing of the remaining KPP has not begun.

Servicing Agency: Defense Information Technology Contracting Organization (DITCO)

Contracting approach: The program has an interagency agreement with DITCO to award contracts to three major telecommunications service providers. These providers develop and deploy priority access capabilities on their public networks. The program also awarded a new contract for integration services in September 2024.

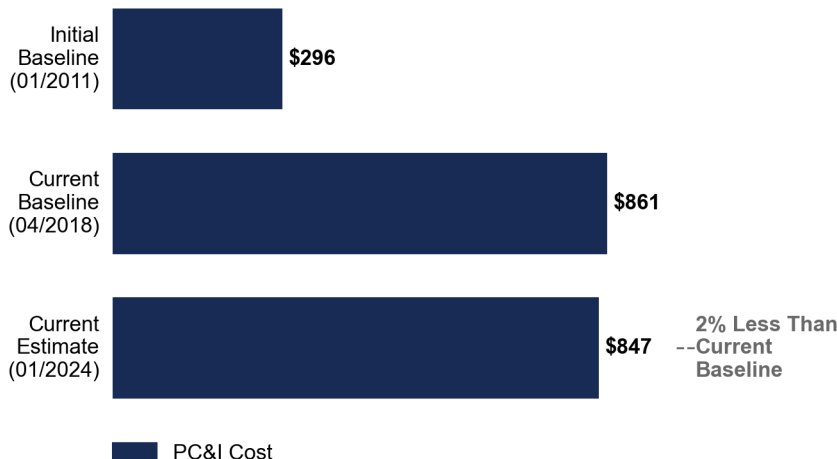
Life-cycle path: Incremental Software Development

Next major milestone: Increment 3 FOC by December 2025

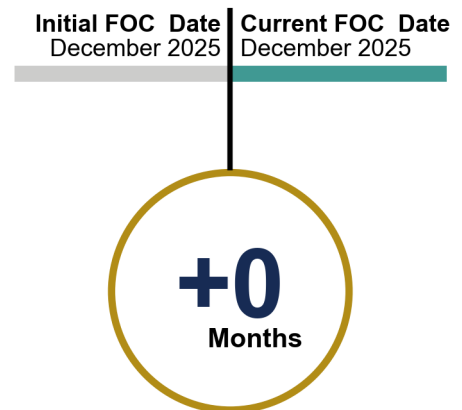
Key Findings

- **Cost and Schedule.** The program’s updated cost estimate is within its current baseline goals. Only increment 3 remains to be completed, and CISA officials said it is on track to achieve FOC by December 2025. However, the program is transitioning integration services to a new contractor, which could cause delays in increment 3.
- **Performance and Testing.** The program plans to test the remaining unmet KPP by December 2025 once all service providers deploy increment 3 capabilities. New contracts were awarded for up to 10 years to the major service providers in 2024. CISA officials said these contracts include added cybersecurity requirements.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



NEXT GENERATION NETWORK PRIORITY SERVICES PHASE 1

Program History and Acquisition Strategy

DHS established NGN-PS in response to an executive order requiring that the federal government be able to communicate at all times. The program's acquisition strategy aims to achieve cost-effective priority services by using commercially-owned public communications infrastructure. Once operational, CISA transfers NGN-PS acquired capabilities to its Priority Telecommunications Service program for sustainment. NGN-PS and Priority Telecommunications Service are intended to work together to prevent operational gaps in emergency communications. CISA established initial baselines for NGN-PS Phase 1 increment 1 in January 2011 and increment 2 in November 2013. DHS leadership approved a revised baseline for NGN-PS Phase 1 in April 2018, which established cost and schedule goals for increment 3. The program achieved FOC for increments 1 and 2 in October 2018 and December 2022, respectively, and is currently working to complete increment 3.

Cost and Schedule Status

CISA officials said increment 3 is on track to achieve FOC by December 2025 as planned. However, the program recompeted its requirement for integration services and awarded a contract to a new contractor in September 2024, which increases the risk of delays. CISA officials reported that this contract includes managing the ongoing development and deployment of increment 3 capabilities by the three major service providers, seven local service providers, and a cable company. CISA officials stated they are working to minimize potential delays caused by the transition in integration service contractors. For example, CISA extended its previous integration services contract to December 2024 to ensure there is no gap in service.

The current cost estimate of \$847 million covers all three increments and is within the current baseline goals.

Performance and Testing

Phase 1 met five of six KPPs. The remaining unmet KPP—wired call quality—is planned to complete testing by December 2025. Increment 3 achieved IOC in March 2020, when wired capability for voice over internet protocol was attained with a single service provider. Increment 3 will achieve FOC once all service providers deploy these capabilities over their core networks and operational testing is successfully completed.

The Priority Telecommunications Service program evaluates the testing conducted by service providers on their own networks. According to the NGN-PS program manager, this assures consistent Priority Telecommunications Service operations as NGN-PS capabilities are incorporated. The NGN-PS program focuses on developmental test and evaluation activities such as witnessing and reviewing tests to verify performance, functionality, and operational readiness.

Capabilities for NGN-PS are an extension of service provider networks, which are susceptible to cybersecurity attacks. CISA officials reported that service providers have proprietary and confidential cybersecurity efforts, and that it is difficult to obtain sufficient information on

how these providers implement cybersecurity processes. To mitigate this challenge, CISA officials said they added requirements in the new contracts with the three major service providers, which were awarded in April and May 2024. These requirements include conducting a cyber tabletop exercise and attesting that specific protocols are used to secure the networks. The program's independent test agent also completed a series of cybersecurity assessments on Priority Telecommunications Service's operational system and plans to assess the cyber resiliency of NGN-PS Phase 1 increment 3 capabilities once they are complete.

Program Management

CISA officials reported that the new contracts with major service providers awarded in April and May 2024 will operate similarly to the program's prior contracts. Specifically, each base contract includes 9 option years—for a potential performance period of 10 years in total—and covers activities for Phases 1 and 2 of the program.

Program Office Comments

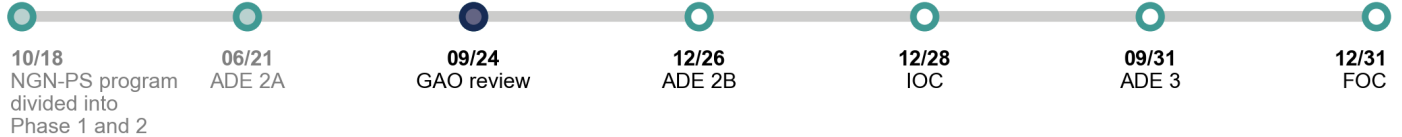
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.

Next Generation Network Priority Services Phase 2

NGN-PS is a multi-phased program that aims to enhance emergency telecommunications services to ensure public safety personnel can communicate during emergency response and recovery operations. Phase 1 is developing and deploying priority voice access. Phase 2 builds on Phase 1 by developing and deploying priority data, video, and information services capabilities. It also consists of proofs of concept to explore service options, alternate technologies, and cybersecurity implications for data and video capabilities. CISA has not yet established increments for Phase 2.



Source: DHS. | GAO-25-107317.



Program Information

Component: Cybersecurity and Infrastructure Security Agency (CISA)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: Testing of 7 KPPs has not begun.

Servicing Agency: Defense Information Technology Contracting Organization (DITCO)

Contracting approach: The contracts awarded in 2024 to major telecommunication service providers under the program’s interagency agreement with DITCO support both Phase 1 and Phase 2 activities.

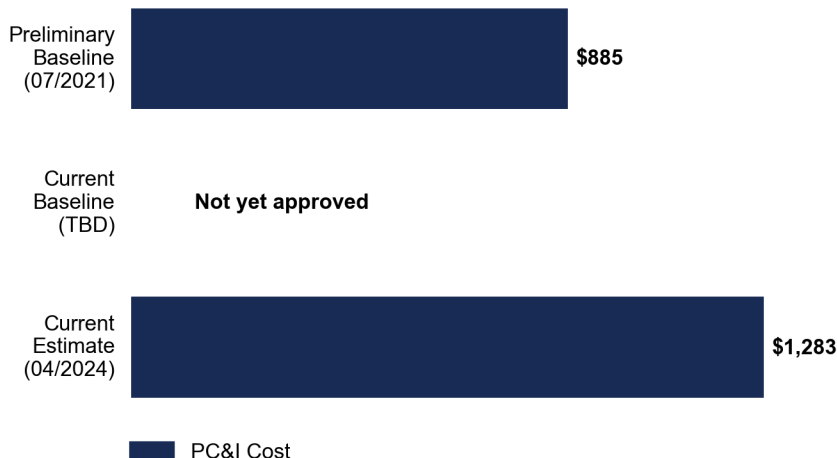
Life-cycle path: Incremental Software Development

Next major milestone: ADE 2B by December 2026

Key Findings

- **Cost and Schedule.** The program’s current cost estimate is \$1.3 billion, but the program will not have an initial baseline until ADE 2B. This milestone has already been delayed 2 years. According to CISA officials, ADE 2B may be further delayed because the program did not receive the increased funding it requested for fiscal year 2025.
- **Performance and Testing.** The program continues to pursue development of Phase 2 capabilities and plans to employ the same test strategy as Phase 1, which consists of testing conducted by service providers on their own networks. CISA officials said they are prioritizing capabilities based on service provider development schedules.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



NEXT GENERATION NETWORK PRIORITY SERVICES PHASE 2

Program History and Acquisition Strategy

DHS established NGN-PS in response to an executive order requiring that the federal government be able to communicate at all times. The program's acquisition strategy aims to achieve cost effective priority services by using commercially-owned public communications infrastructure. Once operational, CISA will transfer capabilities acquired under NGN-PS Phase 2 to its Priority Telecommunications Service program for sustainment, similar to Phase 1. NGN-PS and Priority Telecommunications Service are intended to work together to prevent operational gaps in emergency communications.

Cost and Schedule Status

NGN-PS Phase 2 continues to face significant funding shortfalls, which CISA officials stated may further delay reaching ADE 2B. As we reported in last year's assessment, this milestone has already been delayed from December 2024 to December 2026 because the program received less funding than it needed in fiscal year 2024. Because Phase 2 is pre-ADE 2B, it does not have an initial baseline with cost or schedule goals.

The program based its preliminary cost goal of \$885 million on its 2021 cost estimate. However, as we reported in last year's assessment, the cost estimate increased by about 60 percent in 2023. Program officials attributed that increase to inflation, an extended schedule, and the addition of another major wireless service provider, among other things. The program's cost estimate has not changed significantly since 2023.

According to CISA officials, the program tried to address funding shortfalls through the fiscal year 2025 budget request process by requesting increased funding for Phase 2. However, the President's fiscal year 2025 budget included about 20 percent of the increased funding the program reported it requested for Phase 2. CISA officials are determining how the funding shortfalls will affect the program's scope and schedule.

Performance and Testing

Phase 2 has seven KPPs that focus on data communications and audio/video quality that meet mission and user needs, among other things. However, CISA officials stated that the KPPs may be revised as the program develops its initial baseline. They anticipate this effort will also include dividing Phase 2 capabilities into increments, like Phase 1.

Though the program does not yet have an initial baseline, it is working with major service providers to develop and deploy Phase 2 capabilities. To maximize the use of available funding, CISA officials stated that they are prioritizing capabilities based on each service provider's existing development schedule for priority features. For example, service providers wanted to implement 5G voice first, which was not originally part of Phase 2. The NGN-PS program chose to prioritize that capability during Phase 2 to align with the providers' schedules. This

decision also aligns with user needs. CISA officials stated that a survey of users conducted by the program's independent test agent identified 5G voice as one of the highest priority needs.

CISA is employing the same test strategy for Phase 2 as it did for Phase 1. Specifically, capabilities will be evaluated through developmental and operational testing conducted by service providers on their own networks. The government will provide oversight to verify performance, functionality, and operational readiness.

Additionally, CISA is pursuing proofs of concept to inform aspects of Phase 2 and to lay the groundwork for future NGN-PS phases. The proofs of concept, according to CISA officials, focus on (1) interoperability; (2) cybersecurity; (3) alternative network technology; (4) Wi-Fi; and (5) other concepts for data, video, and information services. As of September 2024, CISA officials told us that at least one proof of concept had been completed in each of the focus areas.

Program Management

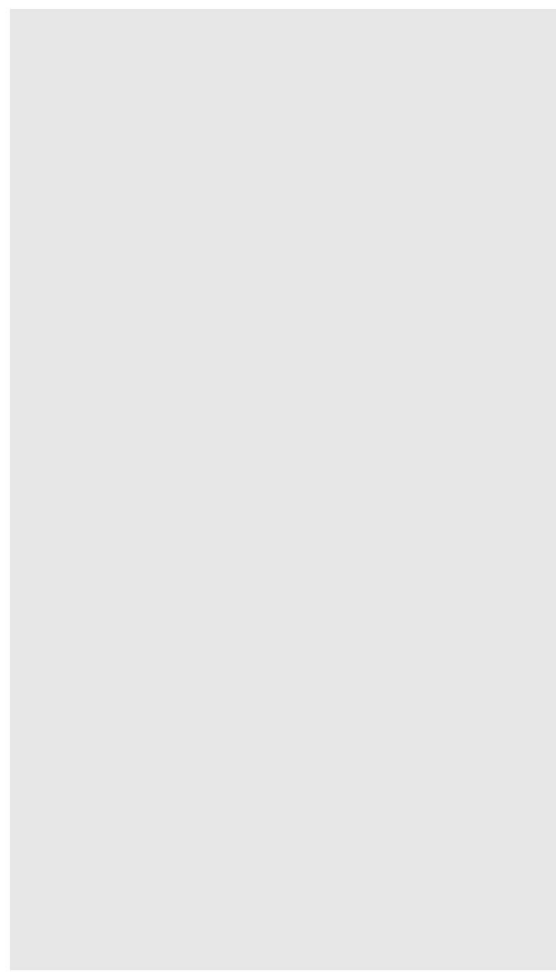
The program plans to transition staff between NGN-PS phases as Phase 1 winds down and Phase 2 ramps up. CISA is also working to fill five new positions added in fiscal year 2024. As of September 2024, CISA officials said that four of the new positions had been filled, including a deputy program manager. The remaining position is for a standards and policy branch chief who will support both NGN-PS and Priority Telecommunications Service.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.

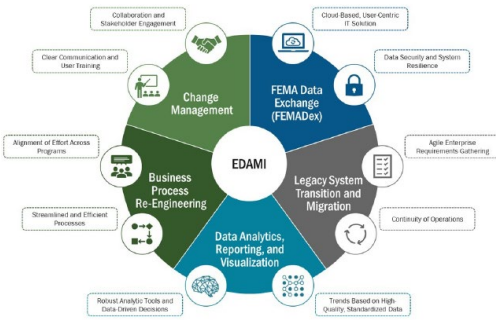


Federal Emergency Management Agency



Enterprise Data and Analytics Modernization Initiative

EDAMI aims to enhance FEMA’s capacity to make data-driven decisions to inform disaster preparedness, response, and recovery operations; provide support to field staff, leaders, and partners; and improve outcomes for communities and survivors. The program aims to provide enterprise analytics capabilities and offer business intelligence support through the cloud-based FEMA Data Exchange (FEMADex) platform. FEMADex will integrate over 70 existing data systems and replace the legacy Enterprise Data Warehouse system.



Source: FEMA. | GAO-25-107317



Program Information

Component: Federal Emergency Management Agency (FEMA)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: Testing of 5 KPPs has not begun.

Number of prime contractors: 11

Contracting approach: The program reported awarding 25 contracts in fiscal year 2024, including a firm-fixed-price task order for Agile development and testing support.

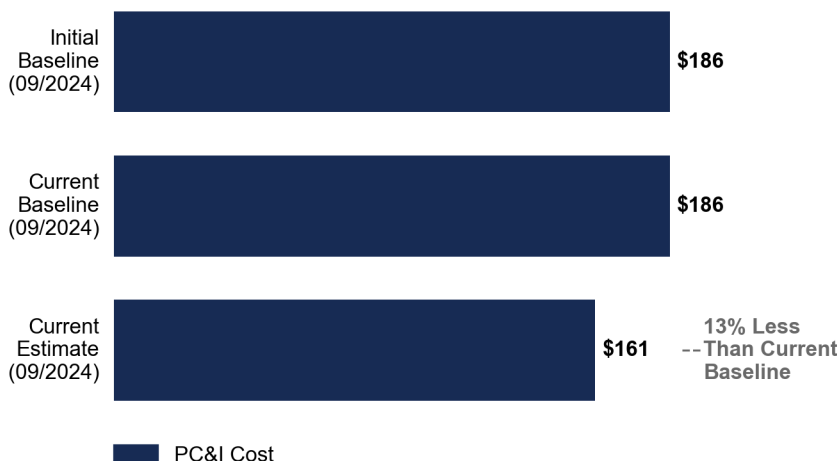
Life-cycle path: Incremental Software Development

Next major milestone: IOC by September 2026

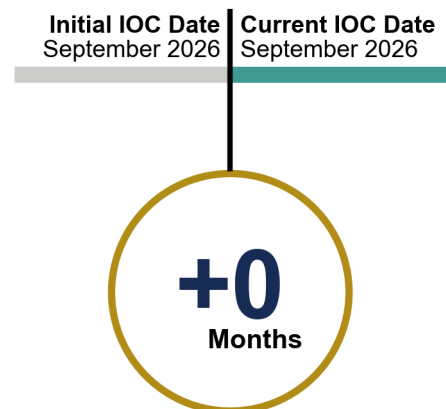
Key Findings

- **Cost and Schedule.** After receiving less PC&I funding for fiscal year 2024 than requested, the program shifted ADE 2B from June to September 2024. The program successfully met ADE 2B in September 2024 after completing a preliminary design review in May 2024, as required for ADE 2B.
- **Performance and Testing.** The program achieved a minimum viable product in December 2023, following completion of its First Adopter Program. DHS granted EDAMI authority to operate FEMADex in April 2024 and the program held a successful software preliminary design review in May 2024.
- **Program Management.** The program reported a risk associated with data stewardship, which EDAMI program officials are mitigating through training. O&S funding reductions across FEMA may reduce available positions within the program.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



ENTERPRISE DATA AND ANALYTICS MODERNIZATION INITIATIVE

Program History and Acquisition Strategy

FEMA established the EDAMI program in 2017 to improve data-driven decision-making capabilities and share insights with emergency management partners throughout the disaster life cycle. The program is using an Agile development approach to plan, design, and test capabilities. The program employs an Agile IT acquisition strategy to design, develop, and deliver customized software programs for full-scale FEMADex system deployment. In July 2022, the program achieved ADE 2A after developing a program LCCE and conducting a proof of concept phase, among other activities.

Cost and Schedule Status

The program's current PC&I cost estimate is less than its initial baseline estimate. Slightly more than half of the program's estimated total costs reflect federal staffing, software development, and cloud hosting. To sustain operations during a continuing resolution, the program reported using fiscal year 2023 PC&I funds that remained available for obligation. Program officials reported that they chose to omit several optional tasks from the new Agile development contract to carry over sufficient funding for critical operations until fiscal year 2025.

Since last year's assessment, the program delayed ADE 2B from June to September 2024 after receiving less PC&I funding than it requested for fiscal year 2024. Additionally, program officials stated that delays in developing and approving the initial APB were due to the timing of the fiscal year 2024 appropriations act, which contributed to the ADE 2B delay. In addition, program officials are planning to update the program spending plan and manage contracts to maintain operations.

In May 2024, the EDAMI program held a successful software preliminary design review, completing a release roadmap and systems engineering life-cycle tailoring plan for FEMADex functionality. The EDAMI program achieved the ADE 2B milestone in September 2024 after the FEMA Office of the Chief Information Officer endorsed the FEMADex solution architecture.

Performance and Testing

In December 2023, the EDAMI program completed its pilot phase and developed a minimum viable product. The minimum viable product supported FEMADex's fundamental mission by addressing its five mission needs: (1) ingesting, (2) integrating, (3) analyzing, (4) sharing, and (5) protecting data. To reach this milestone, EDAMI officials developed and implemented a First Adopter Program that included groups across the agency to serve as primary users and testers of FEMADex. In April 2024, the program received a 3-year authority to operate FEMADex after pilot phase completion.

In April 2024, EDAMI program officials assessed program progress toward and risks to achieving KPPs in an operational assessment for the program's pilot phase. Program officials stated that they made minor revisions to the KPPs, but the metrics to achieve them remained

unchanged. The program revised its APB in September 2024. Formal KPP testing for the program will occur during initial Operational Test and Evaluation. The developmental phase operational assessment is scheduled for fiscal year 2025, according to program officials. FEMADex will achieve FOC once it meets operational effectiveness and suitability requirements and reaches its KPP threshold values, including reaching 200 concurrent users for scalability.

Program Management

As of September 2024, the program is making progress in filling permanent full-time vacancies, with 94 percent of vacancies filled according to program officials. These officials stated that FEMA-wide O&S reductions may affect the availability of additional positions. The program submitted a staffing plan to FEMA in June 2024.

EDAMI program officials reported challenges in recruiting qualified candidates in technical areas, including artificial intelligence specialists. Program officials stated that they are exploring the use of direct hire authority for data engineer specialists in artificial intelligence. The EDAMI program is also coordinating with FEMA's Senior Counselor for Technology to improve the quality of screening for advanced technical skills in candidates.

The program identified a lack of processes and functionality to support data stewardship in FEMADex as a moderate risk. Program officials stated that they are mitigating this risk by informing FEMADex data stewards of sensitive data standards through data steward community of practice meetings and developing training programs for tagging sensitive data.

Program Office Comments

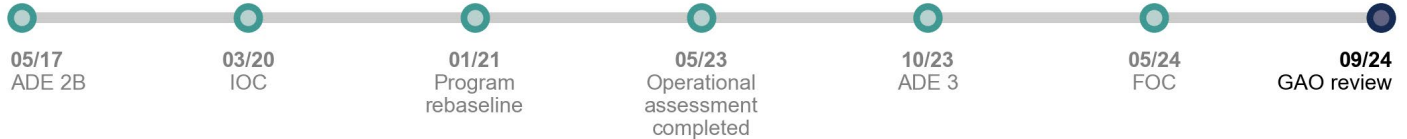
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Grants Management Modernization

GMM aims to integrate FEMA’s grants programs into one unified system, FEMA Grants Outcomes (FEMA GO). GMM plans to develop a common grants life cycle and a single information technology platform for submitting and approving FEMA grants, replacing nine separate legacy systems managing over 40 active grant programs. An integrated approach is expected to improve the oversight and monitoring of funding allocations and support more robust data analytics across program areas to improve efficiency and oversight. FEMA GO will be used by agency headquarters and regional offices, grant recipients, local governments, and tribal and territorial partners to support citizens and first responders.

Source: FEMA. | GAO-25-107317



Program Information

Component: Federal Emergency Management Agency (FEMA)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: 4 of 4 KPPs met.

Number of prime contractors: 11

Contracting approach: The program reported using primarily firm-fixed-price contracts. The program allows for the use of other contract types based on analysis and vendor feedback.

Life-cycle path: Incremental Software Development

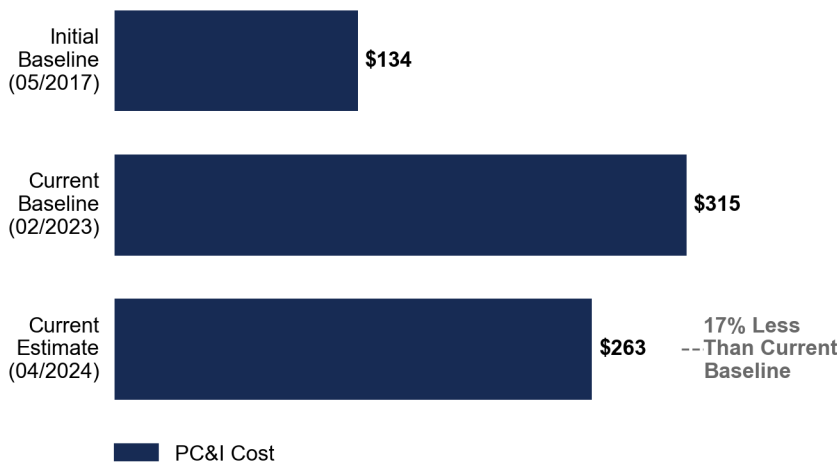
Next major milestone: Transition to sustainment

Current Status

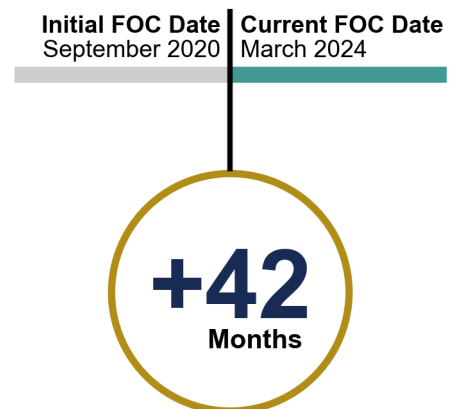
In May 2024, the GMM program achieved FOC by deploying all grant management life-cycle phases. The program updated its cost estimate in April 2024. According to program officials, the program will transition costs to operations and sustainment.

In May 2024, FEMA GO follow-on operational test and evaluation demonstrated the ability to support 30,000 simultaneous users on the platform, meeting the final KPP on service availability at scale. The program assessed vulnerability from adversaries as a cyber resilience concern. FEMA GO achieved external interoperability with no access issues among state and local actors. Program officials stated that FEMA GO now integrates over 40 grant programs.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



Program Office Comments

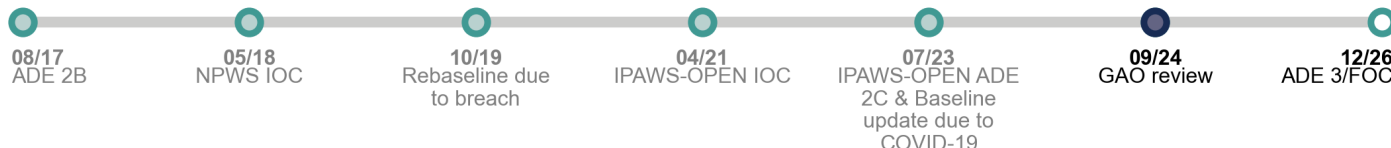
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. GMM is continuing investments in user experience.



Integrated Public Alert & Warning System

IPAWS is a national system for alerting and warning localities in situations of war, natural disaster, or other hazards to public safety. Discrete Segment 1 is delivered and operational. IPAWS is currently focused on Discrete Segment 2, which is comprised of two primary efforts: (1) National Public Warning System (NPWS) radio station modernization, which provides the president access to all television and radio stations for national emergency warnings; and (2) IPAWS-Open Platform for Emergency Networks (IPAWS-OPEN), which migrates the system that routes alert messages to wireless, radio, television, and internet alert systems to an optimized cloud service. Our assessment focuses on Discrete Segment 2.

Source: FEMA. | GAO-25-107317



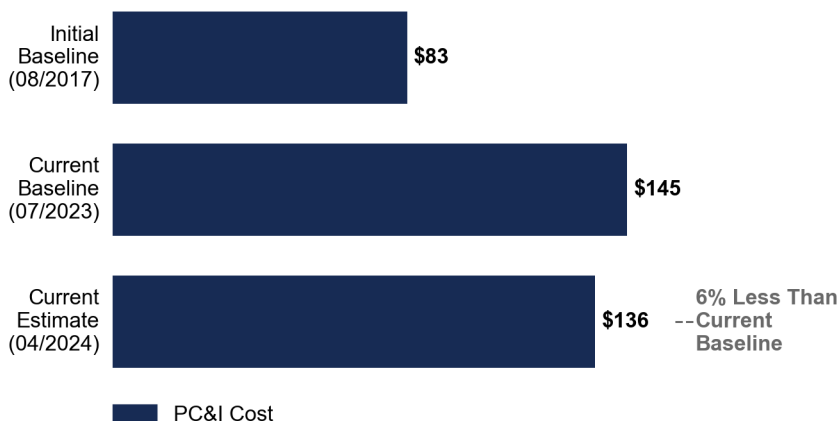
Program Information

Component: Federal Emergency Management Agency (FEMA)
Acquisition Type: Mixed (IT/Non-IT)
Acquisition Level: 2
Key Performance Parameters: 3 out of 3 KPPs met.
Number of prime contractors: 6
Contracting approach: The program reported using a variety of contract vehicles including DHS and General Services Administration contracts for testing activities and to purchase satellite bandwidth.
Life-cycle path: System/Product Development (NPWS)/Incremental Software Development (IPAWS-OPEN)
Next major milestone: ADE 3 by December 2026

Key Findings

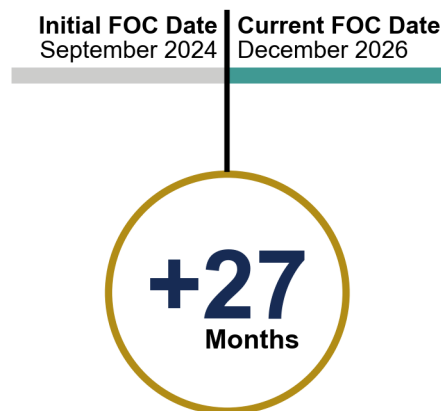
- **Cost and Schedule.** IPAWS is meeting its current baseline cost goals. However, costs of some program elements to modernize shelters at commercial radio stations used to broadcast NPWS alerts are increasing. NPWS radio station modernization is currently scheduled for completion by December 2026, but slower than expected program progress makes this unlikely.
- **Performance and Testing.** NPWS and IPAWS-OPEN operational test activities are complete. The program met its availability goal for fiscal year 2024.
- **Program Management.** IPAWS is managing a high risk that participating NPWS radio stations will potentially relocate or shut down. IPAWS-OPEN recently transitioned to the Incremental Software Development tailoring path.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Costs shown are for Discrete Segment 2 only.

SELECTED MILESTONE DELAY in months



INTEGRATED PUBLIC ALERT & WARNING SYSTEM

Program History and Acquisition Strategy

IPAWS Discrete Segment 2 established its initial baseline in 2017. Since then, the program revised its baseline for Discrete Segment 2 four times and delayed key events each time. For example, IPAWS delayed FOC by over 2 years to December 2026 due to COVID-19-related construction delays, among other things. The program will meet FOC when it completes both NPWS modernization and IPAWS-OPEN migration, and demonstrates that both meet performance goals. This is expected to be concurrent with ADE 3, the decision to commit to production and deployment. In 2020, we made two recommendations to FEMA regarding obtaining feedback from IPAWS users and prioritizing IPAWS applications, which FEMA has since implemented (see [GAO-20-294](#)).

Cost and Schedule Status

IPAWS is meeting its current baseline cost goals but the costs of some program elements are increasing. For example, the costs of equipment and materials like generators and high-quality steel that FEMA needs to build and modernize NPWS shelters at commercial radio stations have increased in recent years. This increase is due to factors including inflation and cost of commodities, according to program officials.

According to program officials, IPAWS recently had three unexpected radio station relocations due to property owners selling land. When relocations occur, the IPAWS program moves equipment to the new location, which adds cost. Program officials said that they plan for one relocation every 2 years in their LCCEs.

IPAWS is not on track to complete NPWS radio station modernization by December 2026. The program is considering an administrative update to its APB to delay ADE 3 and FOC due to external factors influencing the cost and schedule for completing modernization, including labor shortages and supply chain interruptions. The program will consider this schedule adjustment at its next Acquisition Review Board meeting in October 2024, according to program officials.

Performance and Testing

The program completed operational test activities for both IPAWS efforts in January 2024. Subsequently, in July 2024, the DHS Director, Test and Evaluation provided a favorable letter of assessment and recommended that the program continue to address evolving cyber threats and conduct additional testing if necessary.

IPAWS officials assess the Discrete Segment 2 availability goal each fiscal year. IPAWS-OPEN achieved its 99.9999 percent availability goal in fiscal year 2024. Last year, we reported that IPAWS-OPEN first met its goal in 2021 but then failed to meet its goal during fiscal year 2022 because of a DHS network outage. Due to DHS network downtime, including a DHS-wide network failure, the program also did not meet its goal in fiscal year 2023. FEMA officials are working with the DHS IT Engineering division to mitigate these network-related issues, with improvements in fiscal year 2024, according

to program officials. These issues will be included in an evaluation of operational suitability to inform the program's production and fielding decision. Program officials are working with DHS on IPAWS-OPEN network planning and stated that they expect to incrementally adopt this failure mitigation solution through fiscal year 2026, but that it could be delayed due to development and testing.

FEMA conducted a nationwide test of IPAWS capabilities in October 2023. An estimated 91 percent of U.S. adults received the test alert, according to a study sponsored by the IPAWS program office. Program officials said that the system performed as expected and alerts were relayed to private sector support systems.

Program Management

As we reported last year, IPAWS is managing a high risk that participating NPWS radio stations will potentially relocate or shut down. Program officials may not know when a participating radio station needs to relocate or shutdown, which makes it difficult to accurately budget for the activity. The program is mitigating this risk through actions including collaboration with participating radio stations and contingency planning.

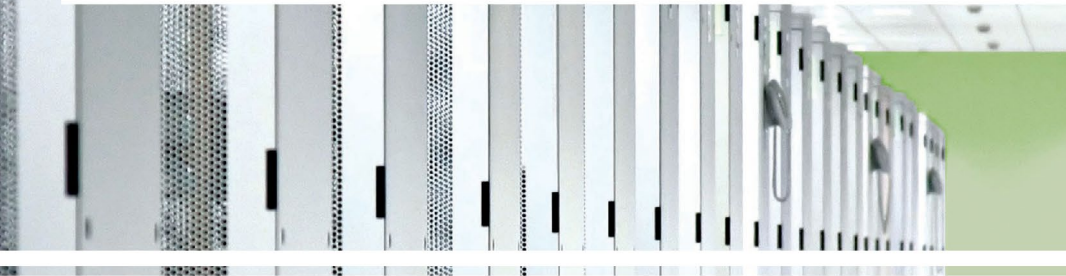
IPAWS-OPEN finished transitioning to the Incremental Software Development path in April 2024. The use of this tailoring path has increased the frequency of deployments and security updates, among other benefits, according to program officials. However, the program is using a modified software development method, according to program officials. Specifically, instead of a standard production release every month, IPAWS follows a release tracker that plans release cycles based on program requirements, external software vendor testing, and other federal rules.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. The IPAWS program stated that it continues to diligently assess, monitor, report, and mitigate external factors outside of FEMA's control that affect schedule and cost.

HART

HOMELANDTM
ADVANCED
RECOGNITION
TECHNOLOGY



Management Directorate

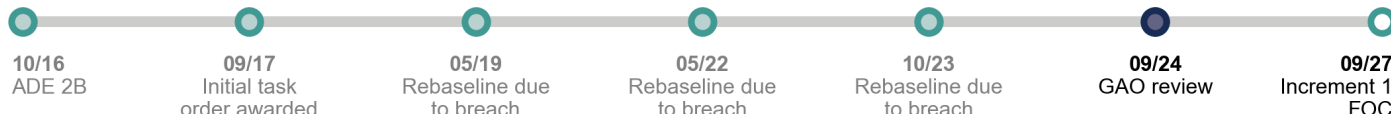




Homeland Advanced Recognition Technology

HART will replace DHS’s legacy Automated Biometric Identification System (IDENT) that compares, stores, and shares biometric information on U.S. citizens and foreign nationals with partners to support travel, trade, and immigration. HART will provide increased biometric and identity management capabilities to support visa programs, law enforcement, intelligence analyses, and other functions. HART is also expected to provide capabilities to compare, store, and share information on multiple biometric characteristics, including fingerprints, face, and irises. The program is currently focused on increment 1—the core operating infrastructure. Future capabilities will be addressed after HART is fielded and IDENT is decommissioned.

Source: Office of Biometric Identity Management. | GAO-25-107317



Program Information

Component: Management Directorate (MGMT)
Acquisition Type: IT
Acquisition Level: 1
Key Performance Parameters: 0 of 4 increment 1 KPPs have been met.
Prime contractor: N/A
Contracting approach: The government took over as the system integrator in October 2022, integrating activities including systems engineering and data center and cloud services provided by four contractors.
Life-cycle path: Incremental Software Development
Next major milestone: Increment 1 ADE 2C by September 2026

Key Findings

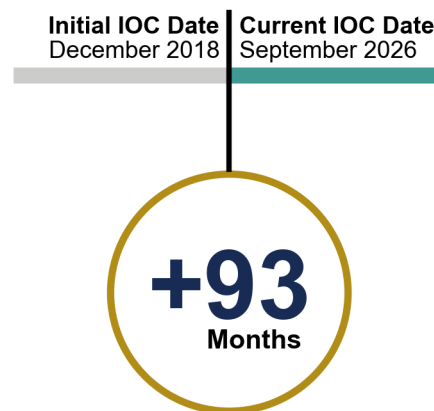
- **Cost and Schedule.** Following a series of schedule breaches, HART currently plans to deliver a core subset of originally planned capabilities at program IOC, 7 years later than the initial estimate, at an expected cost of \$2.3 billion.
- **Performance and Testing.** DHS stakeholders deemed HART not ready for operational assessment in November 2022, delaying the testing to validate key performance parameters.
- **Program Management.** In response to recommendations by a 2023 Management Directorate working group, DHS shifted management and oversight of HART from its Office of Biometric Identity Management to its Office of the Chief Information Officer.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Current baseline includes increment 1 costs and previously expended increment 2 costs.

SELECTED MILESTONE DELAY in months



HOMELAND ADVANCED RECOGNITION TECHNOLOGY

Program History and Acquisition Strategy

The HART program has been plagued with challenges since DHS approved its initial acquisition program baseline in April 2016. At that time the program planned to deliver all capabilities through four increments for \$4.7 billion and reach program IOC in December 2018. The program's most current acquisition program baseline from October 2023 includes just increment 1 at an estimated cost of \$2.3 billion. Program IOC—which marks the delivery of HART as the system of record and the decommissioning of the legacy IDENT system—is now scheduled for September 2026, over 7 years later than initially planned.

Since April 2016, the program has primarily been in breach status and has rebaselined three times. The HART program declared schedule breaches in June 2017, January 2020, and July 2023. The program also declared a cost breach in May 2020. Program officials attributed these breaches to a variety of factors, including contract delays; financial constraints; technical challenges; rework resulting from an overly complex, high-risk design; and disagreements between the contractor and program officials on interpretations of program requirements.

Cost and Schedule Status

Since last year's assessment, which focused on HART's May 2022 baseline, the program completed another rebaselining and was removed from breach status in October 2023. In the new baseline, program cost decreased while the schedule for program IOC slipped 3 years from September 2023 to September 2026. Program officials stated that program funding stability is their key schedule risk at this time. They identified shortfalls associated with the fiscal year 2024 budget as the reason for delaying the award of one program contract until late fiscal year 2024.

However, we found in September 2023 that the program's cost and schedule estimates did not fully follow GAO-identified leading practices. We made two related recommendations in 2023. DHS concurred with these recommendations and is working to implement them by applying cost and schedule management leading practices (see [GAO-23-105959](#)). The timing of this effort calls into question how realistic the cost and schedule goals in HART's October 2023 baseline are.

Continued delays in delivering HART capabilities represent a significant challenge to meeting user needs for DHS and its partner agencies that rely on IDENT. Continued reliance on an overextended IDENT system represents an ongoing risk as the legacy system risks failure and additional investments are necessary to keep the system operational.

Performance and Testing

DHS's November 2022 operational test readiness review determined that the program was not mature enough to begin an operational assessment of HART's progress toward meeting core capabilities. These capabilities include operational effectiveness, suitability, interoperability, and resilience. HART completed large-scale developmental testing during 2023, demonstrating two of four KPPs allocated for increment 1. However, testing officials later noted that they have not yet

independently substantiated those demonstrations. Program officials told us the operational assessment, now planned for early 2026, will be necessary to validate developmental testing results and demonstrate achievement of the remaining increment 1 KPPs.

Program Management

In September 2023, in response to recommendations by a 2023 Management Directorate working group, DHS shifted HART from under the Office of Biometric Identity Management to directly report to the Office of the Chief Information Officer. This shift is intended to help ensure access to subject matter expertise to successfully guide technical execution and support the government's role as the systems integrator. Program officials told us that DHS formalized the shift in September 2024.

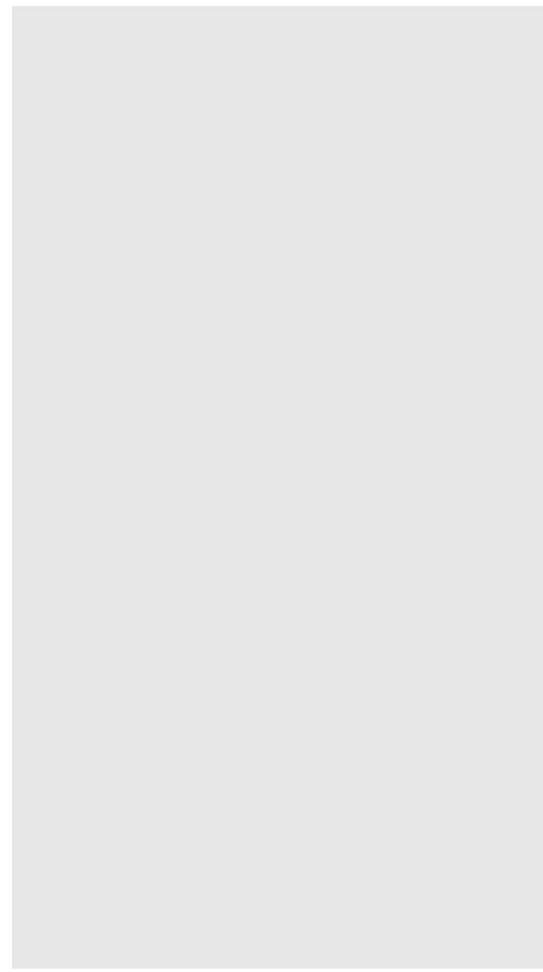
Since October 2022, the federal government has served the role of systems integrator and directed the contractors to improve developmental processes and performance gaps. According to HART program officials, this allows the program to set priorities more effectively, decide on success criteria, and drive the remaining development and testing activities.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. Program officials stated that throughout fiscal year 2024, DHS made fundamental changes to the management of the HART program. Key among these were the transfer of development oversight to DHS Office of the Chief Information Officer, overhaul of the structure of the government/industry team and its Agile development practices, and enhanced governance by DHS headquarters and component executives. Program officials noted that these changes signify the importance of this program to DHS and how the program has prioritized management to achieve program IOC.



Transportation Security Administration

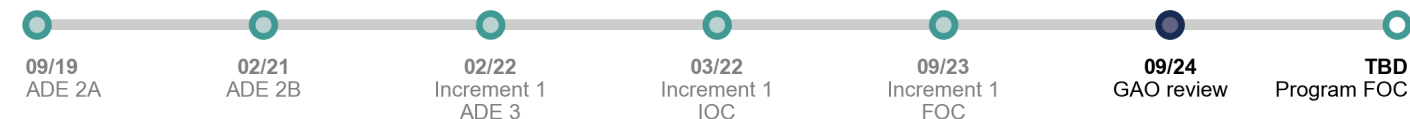




Checkpoint Property Screening System

CPSS is intended to replace aging, two-dimensional Advanced Technology (AT) X-ray machines that TSA uses as the primary screening system for passenger carry-on items at airport checkpoints. TSA plans to incrementally procure 2,263 systems with enhanced capabilities, including computed tomography (CT), to improve detection of explosives, weapons, and other prohibited items. TSA is procuring increment 1 systems in four configurations: (1) AT/CT, (2) base, (3) mid-size, and (4) full-size. This will provide flexibility at airport checkpoint facilities with varying sizes and passenger volumes. The program is also focused on implementing upgrades to fielded systems. This assessment covers increment 1 procurement only.

Source: TSA. | GAO-25-107317



Program Information

Component: Transportation Security Administration (TSA)

Acquisition Type: IT

Acquisition Level: 1

Key Performance Parameters: 4 out of 4 KPPs met.

Prime contractors: Analogic Corporation; Smiths Detection; SureScan (IDSS); Daifuku Airport America Corporation

Contracting approach: The program reported using various contracts for modified commercial solutions with vendor custom-developed software, including firm-fixed-price orders.

Life-cycle path: Incremental Software Development

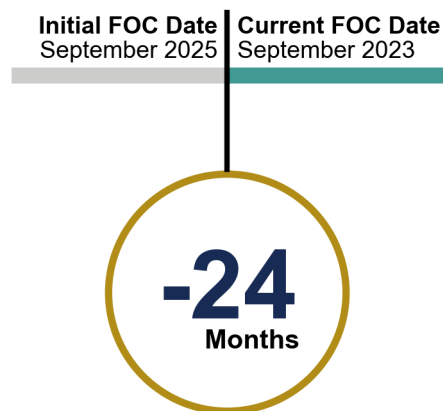
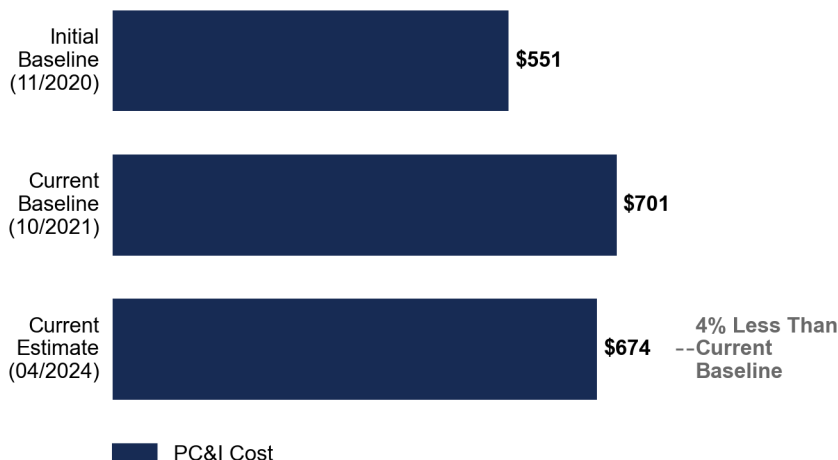
Next major milestone: FOC (program) TBD

Key Findings

- Schedule.** The program reached FOC for increment 1 in September 2023, 2 years ahead of schedule, with the deployment of 771 CPSS units. As of September 2024, according to program officials, the CPSS program had 968 units on contract and, of these, 848 were deployed.
- Program Management.** DHS qualified four vendors—Analogic Corporation, Smiths Detection, SureScan (IDSS), and Daifuku Airport America Corporation—as eligible for contract awards for systems deemed operationally effective, suitable, and cyber resilient. These vendors have a total of 11 systems in the CPSS program's increment 1 qualification phase. The qualification phase ended in December 2023, according to program officials, and the program will procure additional capabilities from these vendors until the start of increment 2.

BASELINE AND CURRENT COST ESTIMATES dollars in millions

SELECTED MILESTONE DELAY in months



CHECKPOINT PROPERTY SCREENING SYSTEM

Program History and Acquisition Strategy

TSA continues to make progress deploying CPSS increment 1 systems. According to program officials, the 11 systems qualified at the end of the increment 1 qualification phase in December 2023 include: Analogic's base, mid-size, and full-size configurations; Smiths Detection's base, mid-size, full-size, and AT/CT configurations; SureScan's (IDSS) mid-size and full-size configurations; and Daifuku's mid-size and full-size configurations. The program plans to procure additional capabilities from these vendors until the start of increment 2, according to program officials. Planning and executing of increment 1 upgrades is ongoing. According to program officials, the program is developing and implementing enhancements and new capabilities that are prioritized into three upgrade paths: (1) enhance detection, (2) system optimization, and (3) networking/cybersecurity, such as remote screening. These officials stated that CPSS will develop these capabilities in additional increments.

Cost and Schedule Status

The program reached FOC for increment 1 in September 2023, 2 years earlier than planned, with the deployment of 771 CPSS units. According to DHS officials, the program was able to do this because the increment 1 systems were less expensive than originally estimated. Further, the availability of additional funding from fiscal year 2020 allowed TSA to procure systems earlier.

As we reported last year, the program previously defined FOC as 910 units. Increment 1 FOC is defined in the APB as the delivery of the last of the 771 increment 1 systems to the field. However, the CPSS program received approval from TSA in July 2022 to exceed the increment 1 FOC quantity. As a result, the program is currently authorized to procure up to 1,000 increment 1 systems.

According to program officials, they extended and transitioned increment 1 from the qualification phase to the upgrade phase. As of September 2024, the CPSS program had 968 units on contract. Of these, 848 were deployed, according to program officials, making the program's deployments roughly 37 percent of program FOC. The current life-cycle cost estimate for increment 1 is \$1.662 billion in base year 2020 dollars, of which \$674 million is acquisition costs. The life-cycle cost estimate is within the APB cost goal.

Performance and Testing

The CPSS program completed operational test and evaluation in fiscal year 2024. The program continues to identify future cyber resilience requirements for locally networked systems. A CPSS system upgrade for remote screening capability is currently in demonstration and has undergone a cybersecurity assessment to include a physical assessment and compliance and vulnerability scans, according to program officials. These officials indicated that TSA is currently evaluating that assessment and the program plans to start resolution of deficiencies in fiscal year 2025.

Program Management

The program plans to have the qualified vendors compete on solicitations for U.S. airports, using a hub and spoke model, according to program officials. During the qualification phase, the program sought to qualify vendors as eligible for contract awards for systems deemed operationally effective, suitable, and cyber resilient for each increment. Program officials told us that they plan to hold competitions and award to the same vendor for a hub (larger central airport) and its spokes (smaller surrounding airports), until all hubs and spokes are completed. Program officials believe this model can save resources because the operations and sustainment team can be centralized in one area, thus reducing related staffing needs.

Going forward, the program plans to use an open systems architecture approach for increment 2, according to program officials. An open system allows various consumers or different manufactures to add, remove, modify, replace, or sustain system components, without having to rely solely on the original manufacturer (GAO-13-651). According to program officials, open architecture will allow the program to standardize the CPSS platform, thereby accommodating all four qualified vendors. Without an open architecture, when a new capability is needed, TSA would have to pay each original manufacturer to develop it, which creates a dependency on these vendors. A standardized platform can also allow third-party companies to develop capabilities, thus increasing competition, according to program officials.

Program officials will identify and prioritize capability enhancements annually based on TSA research and development along with industry technology readiness, according to program officials.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Source: IDEMIA. | GAO-25-107317

Credential Authentication Technology

The CAT system performs three actions that together authorize a passenger to enter the protected area of an airport: (1) authenticate passenger identity documents (ID), (2) confirm passenger flight reservations, and (3) verify passenger prescreened security status. TSA is adding new capabilities by upgrading deployed CAT units and procuring new units. Those upgrades include facial biometric verification to confirm that the presenter of the ID is the person represented on the ID, authentication of digital ID, and self-service capability for individuals to present their own ID. The program is no longer using an incremental strategy and will continue procuring new CAT-2 units until FOC.



Program Information

Component: Transportation Security Administration (TSA)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: 4 of 4 KPPs met.

Prime contractor: IDEMIA

Contracting approach: TSA is procuring upgrade kits for deployed base CAT units using an indefinite delivery, indefinite quantity contract with a firm-fixed-price delivery order. The program awarded an indefinite-delivery, indefinite-quantity contract to IDEMIA to produce new CAT-2 units in April 2023.

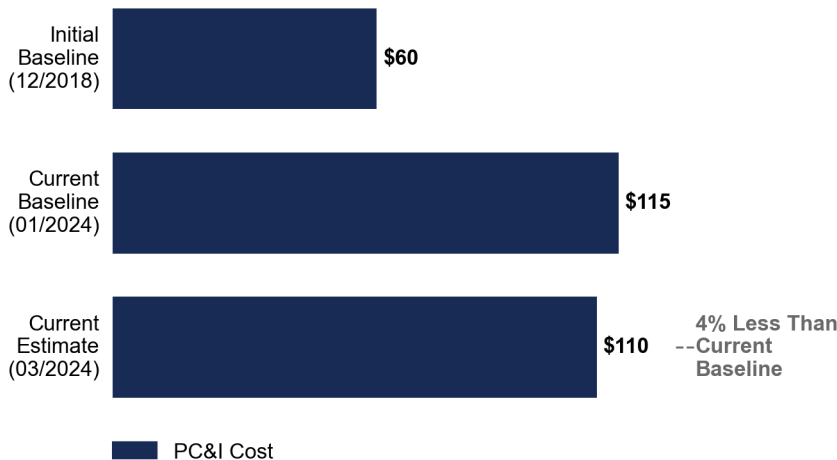
Life-cycle path: System/Product Development

Next major milestone: FOC in September 2049

Key Findings

- Cost and Schedule.** Costs have nearly doubled due to increased quantities and upgraded capabilities. As of July 2024, TSA had procured and deployed 1,426 CAT units with upgrade kits installed. In May 2024, DHS approved ADE 3 for the production and deployment of new CAT-2 units. According to program officials, they will procure the production units as the program progresses toward FOC.
- Program Management.** In June 2023, DHS authorized the program to revise its APB to remove upgrade kit and CAT-2 quantities tied to increments to allow the program to procure in line with funding resources. In March 2024, DHS directed the program to revise the APB to reflect changes in the program plan, according to program officials. The program expects to complete the revised APB in December 2024. A new strategy using a hub and spoke model has expedited deployment, according to program officials.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months

Note: next milestone to take place in 2049.

CREDENTIAL AUTHENTICATION TECHNOLOGY

Program History and Acquisition Strategy

While the CAT systems verify that a passenger's physical ID is authentic, the upgrade kits and CAT-2 systems biometrically compare a passenger's facial image against the image on their ID. In doing so, the CAT-2 systems automate the verification process, which closes a capability gap in identity verification and improves TSA's ability to mitigate the threat of imposters. In June 2022, the CAT program rebaselined to add new capabilities, including this facial recognition verification. The rebaseline also increased the quantity of deployed systems by 2,065, thus adding to the program's total cost. In addition, it included separate ADE 3 events for the base CAT upgrades kits and CAT-2 production systems.

Cost and Schedule Status

From 2018 to 2024, costs increased from the initial baseline largely due to increases in capabilities and quantities. In addition, according to program officials, costs increased because the APB from June 2022 supporting increment 1 costs included estimates, whereas the subsequent updated APB costs were based on actual increment 1 contract data. As the program progresses toward FOC, the program office is developing cost documentation based on existing contract information, according to program officials.

As of July 2024, TSA had procured and deployed 1,426 CAT units with upgrade kits installed. In May 2024, DHS approved ADE 3 for the CAT-2 production units, which allows the program to procure and deploy these systems. According to program officials, they will procure production units as the program progresses toward FOC.

Performance and Testing

The program completed initial operational test and evaluation for the CAT-2 production units in December 2023, which found that the system was operationally effective, operationally suitable, and operationally resilient with limitations. This included an adversarial assessment on the CAT-2 systems that identified and analyzed vulnerabilities. For ADE 3 approval, program officials indicated that the program successfully demonstrated that the CAT-2 production unit met all the KPPs in a relevant operational environment, trained end users, and confirmed that the production process is mature and adequately stable.

Program Management

As we reported last year, the program previously planned to have four increments. According to program officials, the program is no longer pursuing an incremental acquisition strategy as it is no longer relevant. The program will continue procuring and deploying the approved CAT-2 units until reaching the authorized FOC quantity of 3,585 units.

In June 2023, DHS authorized the program to revise its APB and remove upgrade kits and CAT-2 quantities tied to increments to allow the program to procure upgrade

kits and CAT-2 units in line with funding resources. In March 2024, DHS directed the program to revise the APB to reflect changes in the program plan, according to program officials. Program officials expect to complete the revised APB in December 2024.

The CAT program is using a hub and spoke strategy to deploy upgrade kits quickly, according to program officials. Using this approach, the contractor rents space near a larger airport, or hub, and nearby smaller airports, or spokes. The contractor can then ship upgrade kits to those facilities, where the CAT systems are updated and then delivered back to the airports.

According to program officials, this deployment strategy has contributed to the program being 9 months ahead of its planned deployment schedule. Program officials also noted that this approach is less disruptive to airports that would otherwise have to provide space to unpack upgrade kits, disassemble the existing systems, and complete the upgrades. The program also gathered user feedback from airport personnel to improve installation, training, procedures, and maintenance, among other areas.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



U.S. **Coast Guard**

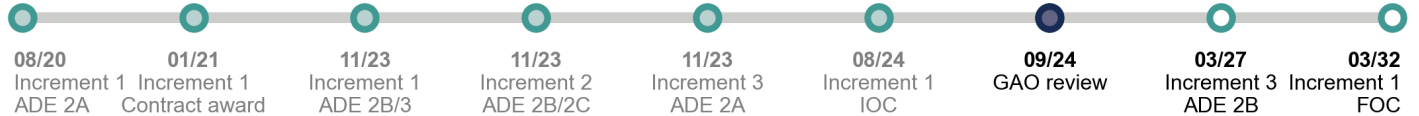




Medium Range Recovery Helicopter

The MH-60T is a medium-range, multi-mission helicopter that the Coast Guard uses to fulfill missions such as search and rescue, and drug interdiction. The program is divided into three increments focused on extending the service life of the Coast Guard’s MH-60T fleet through the late 2040s; and increasing the number of aircraft in the fleet to replace the short-range MH-65 helicopters as they reach their service life limit. All increments have the option to use a mix of converting retired Navy H-60 aircraft and procuring new hulls from the original equipment manufacturer. This assessment covers all three increments.

Source: U.S. Coast Guard. | GAO-25-107317



Program Information

- Component:** U.S. Coast Guard (USCG)
- Acquisition Type:** Non-IT
- Acquisition Level:** 1
- Key Performance Parameters:** 6 out of 6 KPPs met.
- Prime contractor:** Sikorsky Aircraft Corporation (new hulls)
- Contracting approach:** The program reported awarding a sole-source indefinite-delivery, indefinite-quantity, firm-fixed-price contract to Sikorsky Aircraft Corporation for new hulls in 2021.
- Life-cycle path:** System/Product Development
- Next major milestone:** Increment 3 ADE 2B by March 2027

Key Findings

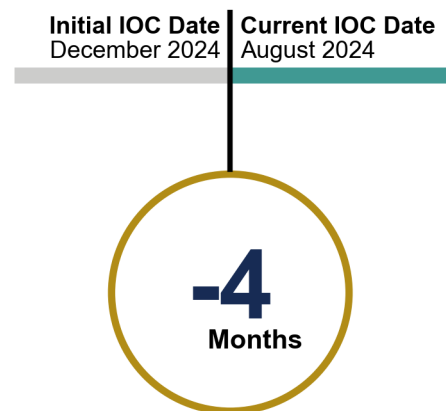
- Cost.** In November 2023, DHS approved splitting the program into three increments and approved the program’s APB. This APB established cost and schedule baselines for increments 1 and 2 and preliminary cost and schedule baselines for increment 3. The program’s current acquisition cost estimate of \$3.4 billion is within the current baseline and includes preliminary costs for increment 3.
- Program Management.** The program plans to expand the MH-60T fleet to at least 127 total aircraft. However, the Coast Guard may grow the fleet to 146 aircraft to replace the 98 MH-65 aircraft that the Coast Guard is planning to retire. This decision depends on the scope of increment 3, which is expected to reach ADE 2B by March 2027.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Current baseline includes preliminary estimates for Increment 3.

SELECTED MILESTONE DELAY in months



MEDIUM RANGE RECOVERY HELICOPTER

Program History and Acquisition Strategy

The MH-60T program aims to 1) extend the fleet's service life by replacing current aircraft—as they reach their 20,000 hour service life—with new or Navy conversion hulls and 2) grow the fleet from 48 aircraft to at least 127 in three increments. In November 2023, DHS approved cost and schedule baselines for the first two increments of the MH-60T program. Specifically, DHS approved the service life extension of 45 medium-range MH-60T helicopters, currently in the fleet, through the late 2040s (increment 1) and the acquisition of an additional 36 hulls (increment 2). In January 2021, the Coast Guard decided to consolidate to an all MH-60T helicopter fleet and phase out its MH-65 aircraft. This was because the manufacturer ended production of those helicopters in 2018, leading to difficulties obtaining spare parts. In April 2024, we found the Coast Guard did not assess whether the MH-60T helicopter best meets its mission needs (GAO-24-106374). GAO recommended that Coast Guard assess the type of helicopters it requires. DHS agreed with this recommendation and Coast Guard officials stated they intend to conduct an assessment that meets the intent of the recommendation before incorporating increment 3 into the program baseline.

Cost and Schedule Status

In November 2023, DHS approved splitting the MH-60T program into three increments, and approved the following milestones: ADE 2B/3 for increment 1, ADE 2B/2C for increment 2, and ADE 2A for increment 3. The November 2023 APB set cost and schedule baselines for increments 1 and 2 and preliminary cost and schedule baselines for increment 3. The program's current total acquisition cost baseline is \$3.9 billion. Its current acquisition cost estimate of \$3.4 billion is within the current baseline and includes preliminary costs for increment 3. Coast Guard officials stated they want to use as many new hulls as possible for all three increments because these hulls have longer service lives. They reported plans to procure additional hulls by modifying the increment 1 contract.

Increment 1 continues the service life extension of the existing fleet begun at the ADE 2A decision. Coast Guard officials anticipate fielding 45 aircraft as part of increment 1 using 40 new hulls and five Navy conversion hulls. According to Coast Guard officials, Sikorsky Aircraft Corporation delivered the first new hull in December 2023 via an indefinite-delivery, indefinite-quantity contract. The Coast Guard achieved initial operational capability of increment 1 in August 2024 with the delivery of the third aircraft.

Increments 2 and 3 are expanding the MH-60T fleet to an overall fleet size of at least 127 aircraft. The Coast Guard expects to transition air stations from MH-65 aircraft to the MH-60T under these increments. Increment 2 plans to transition eight air stations with minimal infrastructure upgrades. Increment 3 includes transitioning air stations that require more extensive infrastructure upgrades, such as work needed to store MH-60T aircraft in hangars. The Coast Guard's estimate for necessary facility upgrades to complete the air station transitions is \$1.3 billion in then-year dollars. In increments 2 and 3, the Coast Guard plans to include modifications to the aircraft that will allow a subset of the fleet to be stored in the hangars on

cutters. The program plans to accomplish this with the ability to fold the aircraft's rotor blades and tail.

Performance and Testing

The Coast Guard reported that the MH-60T helicopter met all six of the program's KPPs based on operational data over 25 years. The KPPs relate to endurance, radius of action, cargo capacity, communications interoperability, navigational accuracy, and reliability.

In October 2023, DHS completed a technical assessment of increments 2 and 3 that noted two technical risks: (1) the Coast Guard did not conduct a functional analysis of MH-65 and MH-60T capabilities to identify potential mission gaps, and (2) the Coast Guard has no documented analysis supporting final air station locations and facility improvements needed to support the MH-60T fleet. DHS made recommendations regarding both.

Program Management

While the November 2023 APB set the size of the fleet at 127 aircraft, the Coast Guard may increase the fleet to 146 aircraft if a one-for-one replacement of the 98 MH-65 aircraft is needed. Coast Guard officials stated they would decide whether to increase the fleet size after the program starts work on increment 3. The Coast Guard expects increment 3 to achieve ADE 2B by March 2027.

In the fourth quarter of fiscal year 2024, the Coast Guard lowered the MH-60T's service life from 20,000 hours to 19,000 hours, which Coast Guard officials attributed to an updated analysis of the original aircraft design and Coast Guard utilization, among other reasons. They stated this resulted in eight aircraft being temporarily removed from service until service life limited parts can be replaced.

Program Office Comments

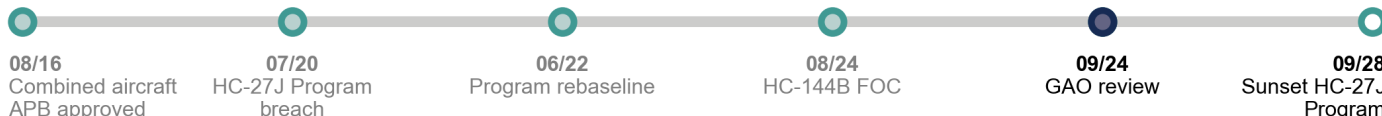
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Medium Range Surveillance Aircraft

The Coast Guard is taking a two-phased approach to acquire aircraft to reduce a gap in maritime patrol hours. Phase 1 covers the acquisition of 18 HC-144 aircraft (referred to as HC-144B once upgraded). The HC-144 aircraft are twin-engine, propeller-driven platforms used to conduct a variety of missions, including search and rescue and disaster response. These aircraft have reconfigurable interiors that can accommodate cargo, personnel, or medical transport as needed, and provide the ability to increase the amount of time on patrol. Phase 2 initially included the conversion of 14 Air Force C-27J aircraft to HC-27Js for Coast Guard missions, but the Coast Guard is currently modifying Phase 2.

Source: U.S. Coast Guard. | GAO-25-107317



Program Information

Component: U.S. Coast Guard (USCG)

Acquisition Type: Non-IT

Acquisition Level: 1

Key Performance Parameters: HC-27J aircraft KPPs not yet tested; 7 of 7 KPPs met for the HC-144B aircraft.

Prime contractors: Airbus Group and GE for the HC-144B

Contracting approach: In addition to the contractors above, for the HC-144, the program reported using firm-fixed-price contracts with vendors and interagency agreements for processor upgrades and related services. For the HC-27J, the program previously used an interagency agreement with the Navy to procure and install aircraft mission systems.

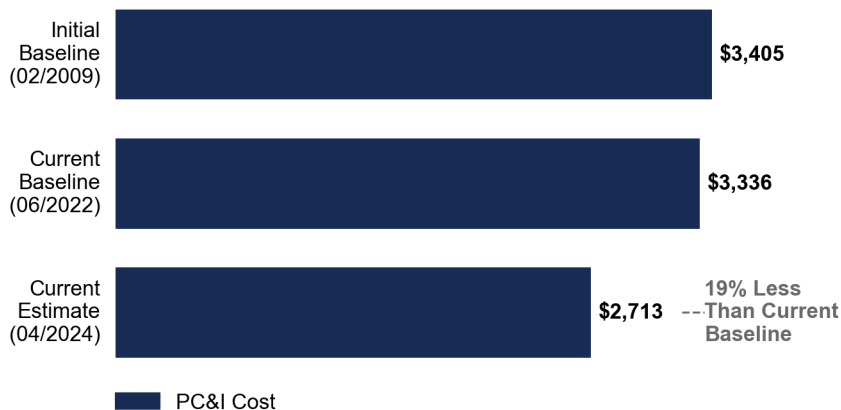
Life-cycle path: System/Product Development

Next major milestone: Sunset HC-27J Program in 2028

Key Findings

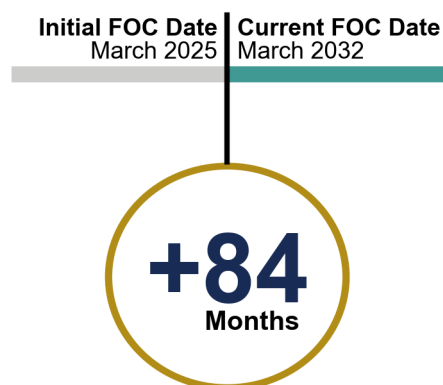
- Cost and Schedule.** The program’s full operational capability milestone has already slipped 84 months due to HC-27J-related schedule changes, and the program baseline does not reflect the current state of the HC-27J aircraft. According to program officials, the program finished upgrading all 18 HC-144s to HC-144B aircraft, with the program reaching full operational capability in August 2024. Total program costs have decreased nearly 20 percent.
- Program Management.** In June 2024, Coast Guard leadership directed the Coast Guard to halt the HC-27J program after not receiving any PC&I funding in fiscal year 2024. Program officials are not certain how the capability will be replaced.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Current estimate includes planned HC-27J costs from before HC-27J modernization halt.

SELECTED MILESTONE DELAY in months



Note: Current FOC represents the last documented date before the HC-27J modernization halt.

MEDIUM RANGE SURVEILLANCE AIRCRAFT

Program History and Acquisition Strategy

In June 2022, the MRS program rebaselined and exited breach status. The revised baseline included changes to the planned schedule and cost for the HC-27J aircraft only, and accounted for time needed to finalize HC-27J production designs, test and certify new configurations, and install mission systems. Specifically, the program baseline was revised to reach its next milestone of low-rate initial production by June 2026. Since rebaselining, the Coast Guard halted the HC-27J modernization program and is examining how to replace that capability. In addition, in April 2024, we found that the HC-27J and HC-144A/B aircraft did not meet the Coast Guard's availability target during fiscal years 2018 through 2022 due to maintenance, repairs, and lack of parts ([GAO-24-106374](#)).

Cost and Schedule Status

The program's full operational capability milestone has already slipped 84 months due to HC-27J-related schedule changes, and the MRS program baseline does not reflect the current state of the HC-27J aircraft. In December 2023, the HC-27J manufacturer issued an alert notice about structural issues with the aircraft and the Coast Guard grounded the fleet to conduct required inspections. According to program officials, inspections revealed structural cracks that required repairs in the fuselage of all 14 HC-27J aircraft. Program officials added that the fleet-wide grounding lasted approximately 40 days, and each aircraft returned to service once structural repairs were completed. Officials reported that the average cost of repairs was \$16,000 per aircraft.

The program finished upgrading all 18 HC-144s to the more capable HC-144B aircraft, according to program officials. These officials plan for these aircraft with upgraded flight management and mission systems to return to service in August 2024. According to program officials, the HC-144 program achieved full operational capability in August 2024. Total program costs have decreased nearly 20 percent.

Performance and Testing

Ground testing of the prototype HC-27J began in April 2023 and flight testing began in September 2023. Prior to the Coast Guard's temporary grounding of the aircraft in December 2023, the program planned for initial operational test and evaluation for the HC-27J to begin by 2025.

As of May 2024, program officials confirmed that they completed cooperative vulnerability and identification testing, conducted by the Coast Guard Cyber Blue Team, to support adversarial cyber testing. According to these officials, the program completed the first phase of adversarial cyber testing in the systems integration lab.

As of March 2022, the HC-144B had demonstrated that it met all of its KPPs based on testing conducted in 2012 and 2021.

Program Management

The program did not receive any PC&I funding for HC-27J modernization upgrades in fiscal year 2024, causing the Coast Guard to stop converting the HC-27J aircraft. A June 2024 memorandum states that HC-27J modernization upgrades were to end immediately, which would render the four aircraft already undergoing these upgrades inoperable. As of June 2024, program officials said that four HC-27J aircraft had nearly completed modernization upgrades, but confirmed they will not be used by the Coast Guard. Program officials estimate that the program has already invested over \$360 million in the program, with an additional \$256 million remaining to finish converting the remaining aircraft.

In addition to the costs already invested, the end of the HC-27J program also caused a capability gap. The Coast Guard plans to conduct a capability assessment to address this gap. In the near term, however, program officials are not certain how the capability will be replaced, but explained that in October 2024, the Coast Guard must submit a fleet analysis report to congressional committees discussing its aviation needs.

Program Office Comments

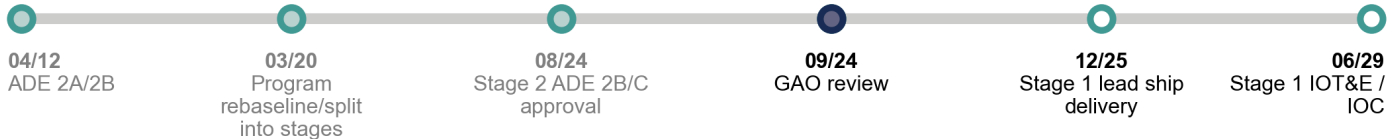
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Offshore Patrol Cutter

The Coast Guard plans to acquire 25 OPCs to conduct multi-mission operations including homeland security, law enforcement, and search and rescue. The OPC is designed for long-distance transit, extended on-scene presence, and operations with deployable aircraft and small boats. The Coast Guard intends for OPC to replace its aging Medium Endurance Cutters and complement the operational capabilities provided by the Fast Response Cutters and National Security Cutters. The Coast Guard is acquiring OPCs in three stages. This assessment covers all three stages, although the Coast Guard has only awarded contracts for stage 1 (OPC 1-4) and stage 2 (OPC 5-15).

Source: U.S. Coast Guard. | GAO-25-107317



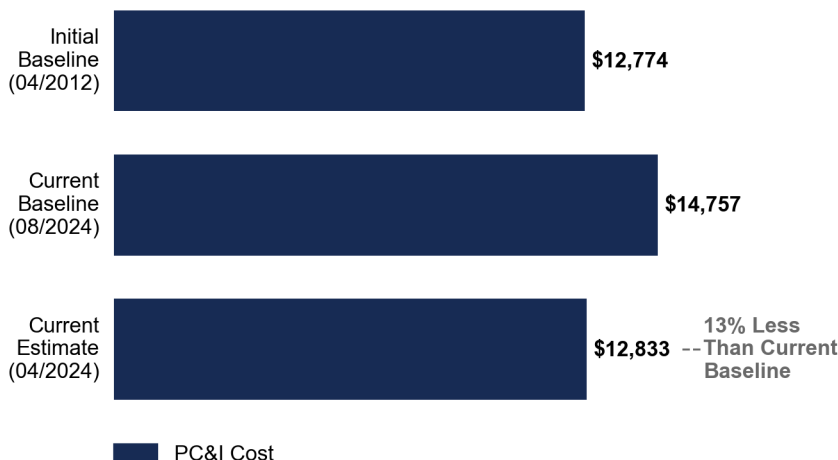
Program Information

Component: U.S. Coast Guard (USCG)
Acquisition Type: Non-IT
Acquisition Level: 1
Key Performance Parameters: Testing of 6 KPPs has not begun.
Prime contractor: Eastern Shipbuilding Group, Inc. (ESG) for stage 1; Austal USA, LLC (Austal) for stage 2
Contracting approach: The program’s contracts include firm-fixed-price and fixed-price incentive (firm-target) line items for the design and construction work.
Life-cycle path: System/Product Development
Next major milestone: Delivery of stage 1 lead ship by December 2025

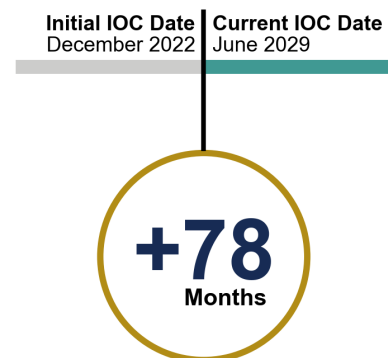
Key Findings

- **Cost and Schedule.** The OPC program rebaselined for a third time in 2024 to reflect changes in the stage 1 testing and delivery schedule and to establish an initial baseline for stage 2. The revised baseline reflected further delays in the delivery of the stage 1 lead ship and IOC. However, according to Coast Guard officials, ESG is still reviewing the costs and schedules for OPCs 2-4, which may lead to further milestone delays. The program also completed a combined ADE 2B/C review for stage 2 to obtain approval for Austal to begin construction.
- **Design and Construction.** ESG has made slow progress constructing the stage 1 lead ship and struggled to complete testing of a prototype of the davit in 2024. DHS leadership approved Austal to begin construction of its first ship without demonstrating the stage 2 davit, which does not align with our shipbuilding leading practices.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



OFFSHORE PATROL CUTTER

Program History and Acquisition Strategy

In 2012, DHS approved OPC's initial acquisition program baseline. In 2014, the program rebaselined to extend its schedule for source selection on preliminary design contracts. In 2016, the Coast Guard selected ESG as OPC's shipbuilder. ESG's contract included design work and options to construct up to nine OPCs. However, after a hurricane devastated the shipbuilder's facilities in 2018, DHS granted ESG extraordinary contractual relief for the design and construction of four OPCs (stage 1) and directed the program to recompetes the requirement for the remaining ships. The Coast Guard rebaselined the program for a second time in 2020 to reflect the restructured program and awarded a contract to Austal in 2022 for design and construction of OPCs 5-15 (stage 2). The Coast Guard plans to acquire OPCs 16-25 under a third stage in the future.

Since October 2020, we have made more than a dozen recommendations to DHS and the Coast Guard regarding management of the OPC program and its shipbuilding policy (see [GAO-23-105805](#); and [GAO-21-9](#)). For example, we recommended in October 2020 that the Coast Guard and ESG update the schedules for OPCs 1-4 and fully incorporate schedule risk analysis to address deficiencies we found with the estimates. As of December 2024, this recommendation and six others remain open.

Cost and Schedule Status

In August 2024, DHS approved the program's combined ADE 2B/C for Austal to begin construction of its first ship (OPC 5). To inform this review, the program updated its cost estimate and rebaselined for a third time. The updated cost estimate is within the program's revised baseline goals. However, DHS determined that the cost estimate does not fully reflect the current status of the program because it was based on data from 2022.

Since 2020, we have reported that delivery of stage 1 ships had been delayed multiple times and ESG had made slow progress with technology development, design, and construction. In July 2023, after notifying the Coast Guard that it could not meet its revised delivery dates, ESG began reviewing costs and schedules for OPCs 1-4. Coast Guard officials stated that, as of September 2024, ESG had only completed its review for OPC 1 and was still reviewing OPCs 2-4.

The Coast Guard now expects delivery of the stage 1 lead ship by December 2025, which is more than 4 years late. Additionally, the program further delayed IOC from March 2026 to June 2029 after it decided to complete initial operational testing on OPC 2 instead of the lead ship. This is because the Coast Guard has approved the lead ship to be delivered without the Coast Guard standard machinery control system, with noncompliant shafting, and with different communications gear. The change resulted in a schedule breach, which the program remediated in its revised baseline.

Design and Construction

We previously reported that the Coast Guard authorized construction of all stage 1 ships prior to demonstrating the maturity of the program's sole critical technology and stabilizing the ship design—contrary to shipbuilding leading practices we previously identified. This critical technology, the davit, is a crane that raises and lowers

OPC's small boats into the water. In March 2024, ESG failed to test a prototype of its selected davit because, according to Coast Guard officials, the davit was not mature enough. Coast Guard officials said that the test was redone in September 2024 and the results are pending. Additionally, construction of the stage 1 lead ship progressed less than 2 percent from May 2023 to May 2024. Coast Guard officials attributed the lack of progress primarily to rework.

In June 2023, we recommended that the Coast Guard follow our shipbuilding leading practices for stage 2 by demonstrating the davit and achieving a sufficiently stable design prior to construction. The Coast Guard did not concur with the recommendations and, in August 2024, DHS leadership approved Austal to begin construction on its first ship.

However, as of July 2024, the stage 2 functional design, which details the size and positioning of structural components and distributive systems, was 95 percent complete. Coast Guard officials also stated that testing of the stage 2 davit was planned for February 2025. This increases the risk that stage 2 will encounter delays. We have ongoing work to further review the design and construction progress of OPC stages 1 and 2.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. The program office maintained that its design maturity standards are appropriate for cutters and the regulatory and policy environments in which they are built. However, as we recommended in our prior work, the program should follow our shipbuilding leading practices by demonstrating technology maturity and achieving a stable design prior to construction. We also recommended that the Coast Guard update its policy to reflect these leading practices.



Polar Security Cutter

The PSC program intends to assist the Coast Guard in maintaining access to the Arctic and Antarctic regions. The Coast Guard will require its PSCs to conduct multiple missions, including ice operations, defense readiness, marine environmental protection, and search and rescue. Currently, the Coast Guard plans to acquire three PSCs to recapitalize and expand its heavy polar icebreaker fleet. This fleet currently consists of one operational cutter that conducts an annual operation in the Antarctic.

Source: Bollinger Mississippi Shipbuilding. | GAO-25-107317



Program Information

Component: U.S. Coast Guard (USCG)
Acquisition Type: Non-IT
Acquisition Level: 1
Key Performance Parameters: Testing of 4 KPPs has not begun.
Prime contractor: Bollinger Mississippi Shipbuilding, LLC
Contracting approach: The program awarded a contract to the shipbuilder—formerly known as VT Halter Marine, Inc.—in 2019, which included fixed-price incentive (firm-target) line items for the design and construction work. In April 2024, the program changed the line item for advance planning, engineering, and design for the lead ship to a firm-fixed-price contract type.
Life-cycle path: System/Product Development
Next major milestone: ADE 2C in December 2024

Key Findings

- Cost and Schedule.** The program indicated in November 2023 that it would breach its cost and schedule goals. It planned to rebaseline those goals by seeking approval from DHS in December 2024. As of November 2024, the cost estimate is expected to grow by over 20 percent above the previous baseline of \$3.3 billion but is not yet completed. Program officials stated that they plan to seek approval for the new baseline before completing ongoing contract negotiations with the shipbuilder.
- Design and Construction.** Design immaturity continues to delay the start of construction, which the program originally planned for 2021. With 81 percent of functional design complete more than 5 years after the award of the detail design contract, the Coast Guard has not yet met its standard of 95 percent completion before starting construction. As of November 2024, the Coast Guard reported authorizing six of the 85 total sections of the ship to help inform full production, but none are finished.

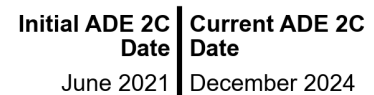
BASELINE AND CURRENT COST ESTIMATES dollars in millions



■ PC&I Cost

Note: Program indicated it would breach current cost baseline in November 2023. Cost baseline expected to increase by at least 20 percent.

SELECTED MILESTONE DELAY in months



POLAR SECURITY CUTTER

Program History and Acquisition Strategy

The Coast Guard established its initial acquisition program baseline for the PSC program in 2018 and has revised it twice, once in 2021 to reflect higher costs and a delayed schedule and in 2022 due to schedule delays related to COVID-19. In 2019, the program awarded a detail design and construction contract to VT Halter Marine, Inc. of Pascagoula, MS for up to three PSCs. In 2022, Bollinger Shipyards in Louisiana bought VT Halter Marine and renamed it Bollinger Mississippi Shipbuilding. We previously made recommendations to help the program maintain its cost and schedule baselines. For example: (1) To implement recommendations we made in 2018, the program conducted a technology readiness assessment, reevaluated its cost estimate, and identified and mitigated schedule risks ([GAO-18-600](#)), and (2) In 2023, we made a priority recommendation to DHS to ensure design is mature prior to authorizing lead ship construction. DHS concurred with the recommendation. As of August 2024, this recommendation remains open ([GAO-23-105949](#)).

Cost and Schedule Status

In November 2023, the program notified DHS that it would breach its cost and schedule goals. As of November 2024, the program is planning to update its acquisition program baseline by the end of 2024. The program's notional schedule as of November 2023 indicates the lead PSC will be delivered in late 2029—a delay of over 5 years since initial plans. The program had planned to complete its cost estimate by September 2024 but still had not done so by November 2024. However, when the program declared the cost breach, it reported costs had exceeded at least 20 percent of the previous goal of \$3.3 billion.

Program officials said that the cost and schedule increases are attributable to several factors including the lack of U.S. shipbuilding expertise for designing and constructing heavy polar icebreakers, the complexity of and changes to the design, and the effects of the COVID-19 pandemic on the program's planned activities.

In October 2023, the shipyard requested restructuring of the contract's detail design and construction line items because it determined it could not meet the original contract terms. In April 2024, the Coast Guard made several modifications to the contract, including changing the line item for advance planning, engineering, and design for the lead ship from a fixed-price incentive to a firm-fixed-price contract type. Program officials do not have an anticipated completion date for contract restructuring as negotiations are ongoing. However, officials said that they plan to finalize the updated acquisition program baseline before negotiations are completed, which introduces uncertainty with the forthcoming cost and schedule goals.

Design and Construction

Design immaturity continues to be a top program risk, even though program officials said they entered the critical design review in September 2024. As of September 2024, and after more than 5 years of work since the contract was awarded, functional design is

approximately 81 percent complete. As a result, it is unlikely that the design will be mature enough to start construction on the lead PSC by the end of 2024. Program officials said they aim to have 95 percent of the functional design complete to start construction by that time, which is inconsistent with ship design leading practices we previously identified.

To address slower than expected design progress, program officials said that the shipyard brought on additional engineering personnel to accelerate design maturity. Program officials said that the shipyard demonstrated completion of significant design work as of the September 2024 critical design review. Further, they said that the Coast Guard will seek approval from DHS to begin lead ship construction in December 2024.

In July 2023, the Coast Guard reported authorizing production of the first of 85 total sections for the ship, an incremental approach to production. As of July 2024, the first section is over half complete. As of November 2024, the shipyard has since begun production on six total sections to build workforce capability, test new processes and equipment, and reduce production risk while design matures.

Coast Guard officials stated that the program conducted cybersecurity assessments in 2023 and 2024 and deemed the results as classified.

Program Office Comments

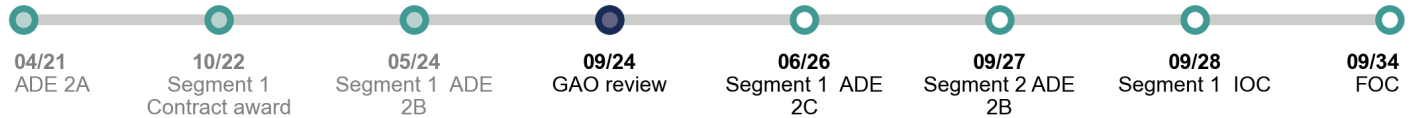
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. In this assessment, we included information for key events as of November 2024 to the extent it was provided by the Coast Guard.



Waterways Commerce Cutter

The WCC is intended to replace the Coast Guard’s legacy fleet of construction and river/inland buoy tenders—cutters with an average age of more than 59 years. The primary mission for the WCCs is to establish, maintain, and operate aids to navigation, known as buoys, on the western rivers and inland waterways. This supports the flow of economic activity along the waterways. The Coast Guard is acquiring a total of 30 cutters in two distinct segments. Segment 1 will replace the river buoy tenders and inland construction tenders with a nearly-common design, and segment 2 will replace the inland buoy tenders.

Source: Birdon America, Inc. | GAO-25-107317



Program Information

Component: U.S. Coast Guard (USCG)
Acquisition Type: Non-IT
Acquisition Level: 1
Key Performance Parameters: Testing of 5 KPPs has not begun.
Prime contractor: Birdon America, Inc.
Contracting approach: The Coast Guard awarded an indefinite-delivery, indefinite-quantity firm-fixed-price contract to Birdon America, Inc. in October 2022 for the design and engineering of segment 1. Officials report that this includes options for production of up to 27 cutters. The three cutters under segment 2 will be built commercially using a government-led design.
Life-cycle path: System/Product Development
Quantity: 30 cutters
Next major milestone: Segment 1 ADE 2C by June 2026

Key Findings

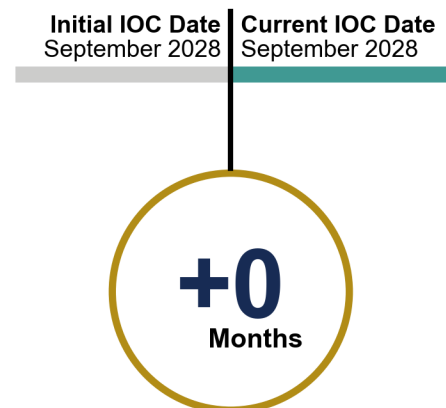
- Cost and Schedule.** DHS approved ADE 2B for segment 1 in May 2024. The program entered critical design review for segment 1 in September 2024. The May 2024 APB established a cost baseline of \$1.847 billion in PC&I costs, in fiscal year 2023 dollars, for both segment 1 and segment 2. The Coast Guard plans to release a request for proposals for segment 2 in fiscal year 2025.
- Program Management.** Birdon America, Inc. purchased a shipyard in Alabama to construct the segment 1 cutters. Birdon previously planned to construct the cutters at Bollinger Shipyards, LLC’s Lockport, LA facility. However, Coast Guard officials stated that Bollinger and Birdon were unable to finalize an agreement for the WCC program. Birdon plans to invest in facility upgrades at its Alabama shipyard and to nearly triple the shipyard’s workforce between July 2024 and the start of construction. The Coast Guard is tracking the shipyard’s workforce as a risk moving forward.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Current baseline and estimate include preliminary costs for Segment 2.

SELECTED MILESTONE DELAY in months



WATERWAYS COMMERCE CUTTER

Program History and Acquisition Strategy

In October 2022, the Coast Guard awarded a contract to Birdon America, Inc. for the design and engineering of segment 1 cutters, which consists of 16 river buoy tenders and 11 inland construction tenders, according to program officials. Coast Guard officials stated that Birdon did not begin work on this contract until March 2023, following resolution of a bid protest. Segment 2, which consists of three inland buoy tenders, is expected to address more unique requirements and will use a government-led design because there is nothing available commercially that can meet the Coast Guard's needs. Following development of the segment 2 design, the Coast Guard intends to solicit proposals from industry to construct the cutters to that specific design. The Coast Guard is striving for maximum commonality between all variants. In addition to the cutters in segments 1 and 2, the program is acquiring new 21-foot boats for use on all variants. Coast Guard officials expect to acquire a minimum of 50 of these aluminum hull boats.

Cost and Schedule Status

In May 2024, DHS approved ADE 2B for WCC segment 1 as well as procurement of long lead materials for segment 1 cutters. Coast Guard officials said that both segment 1 variants—river buoy tenders and inland construction tenders—are being designed together because they have similar requirements and to make sustainment more efficient. This approach can lead to reduced costs.

Program officials expect the two designs to have 95 percent commonality. The primary differences will be the length of the cutters and the working deck equipment. The Coast Guard assessed the design maturity of segment 1 at a critical design review in September 2024. Completion of the critical design review event is pending final resolution of outstanding technical and programmatic issues and is anticipated by December 2024. The May 2024 APB shows a cost baseline of \$1.847 billion in PC&I costs, in fiscal year 2023 dollars, for both segment 1 and segment 2.

The Coast Guard expects the segment 2 design to be sufficiently mature for ADE 2B by September 2027, nearly 5 years later than the original estimates. Program officials said the delay is because the Coast Guard separated the ADE 2B event for segments 1 and 2 to ensure decisions were based on the appropriate level of design maturity. In addition, they said the delay allows for the inland buoy tender design to be informed by the river buoy and inland construction tender designs, which will aid in maximizing commonality across all three variants. The Coast Guard plans to release a request for proposals for construction of segment 2 cutters in fiscal year 2025. Coast Guard officials stated that the 21-foot boat acquisition effort was undergoing a source selection decision as of July 2024.

The program's April 2024 life-cycle cost estimate reflects a total acquisition cost of \$1.606 billion. In addition, the Coast Guard expects to spend more than \$400 million in then-year dollars on shore infrastructure upgrades at the WCC homeports. While these costs are included in the

WCC life-cycle cost estimate, they are funded through the Coast Guard's shore infrastructure program office.

Performance and Testing

According to Coast Guard officials, the program conducted a cybersecurity exercise in fiscal year 2024 focusing on potential vulnerabilities in Birdon's design and the exercise did not identify any significant risks. Program officials stated they also conducted an early operational assessment in the summer of 2024 with the independent testing agent. The report for this event is expected by November 2024. Program officials said that they plan to conduct initial operational testing on each cutter variant.

Program Management

Birdon originally planned to construct the segment 1 cutters at Bollinger Shipyards LLC's Lockport, LA facility. However, Bollinger and Birdon were unable to finalize an agreement for the WCC program. Coast Guard officials stated they did not have insight into Bollinger's rationale because their contractual relationship is with Birdon. Birdon has since purchased a shipyard in Alabama where it intends to construct the segment 1 cutters.

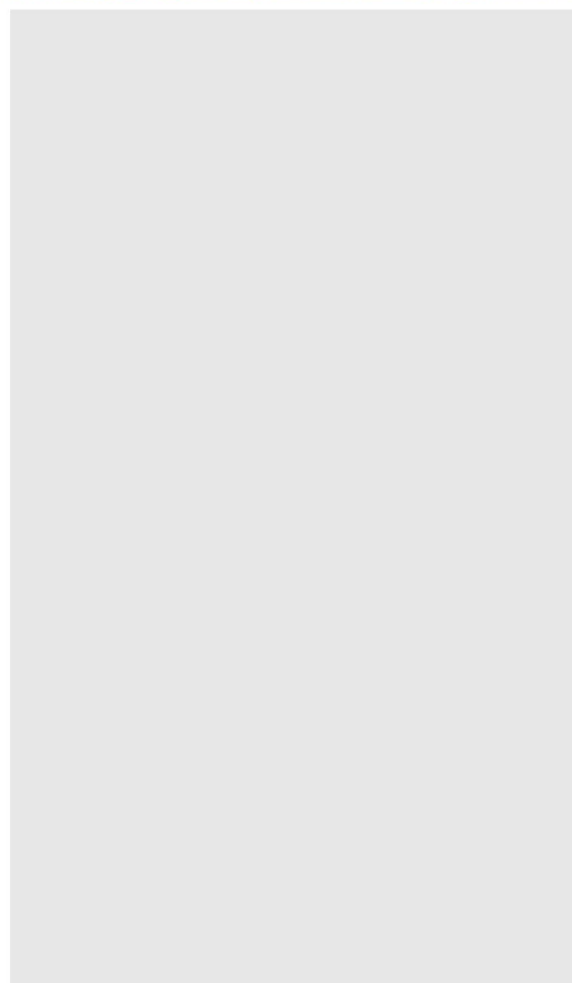
Coast Guard officials said that Birdon plans to nearly triple the shipyard's workforce from 65 personnel to about 175 personnel from July 2024 to the start of construction. The Coast Guard has concerns regarding the shipyard's ability to increase personnel in that time frame due to competition from other shipbuilders in the region. As a result, it is tracking the shipyard workforce as a program risk. Program officials added that Birdon is planning investments in the shipyard to construct the cutters, such as additional assembly halls and production shops.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



U.S. Customs and **Border Protection**

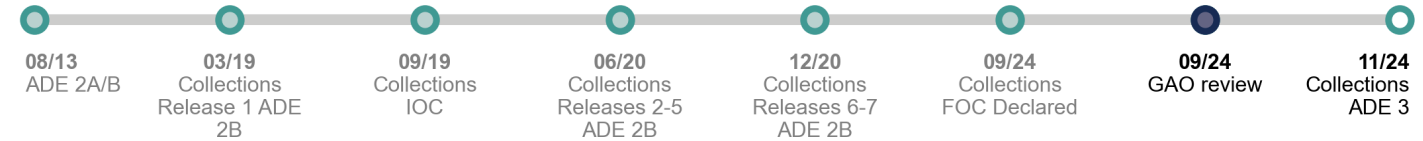




Automated Commercial Environment

ACE is a cloud-based platform that is intended to collect, process, and manage electronically submitted trade data from the international trade community. It aims to provide private and public sector stakeholders access to required information to release imported cargo and clear exported cargo. In 2018, CBP deployed the ACE Core to manage trade data. This assessment focuses on ACE Collections, an incremental development effort intended to modernize the processing and collection of duties owed on imported goods, and ACE IT modernization efforts.

Source: CBP and stock.adobe.com. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: IT

Acquisition Level: 1

Key Performance Parameters: 4 of 4 met

Number of prime contractors: 8

Contracting approach: The program uses multiple contracts for IT services, software development, and sustainment of various types, including firm-fixed-price and cost-plus-award-fee contracts.

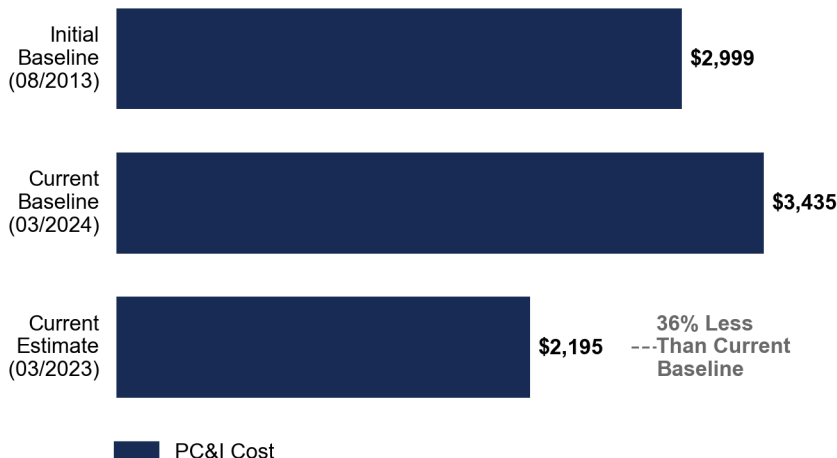
Life-cycle path: Incremental Software Development

Next major milestone: ACE Collections ADE 3 by November 2024

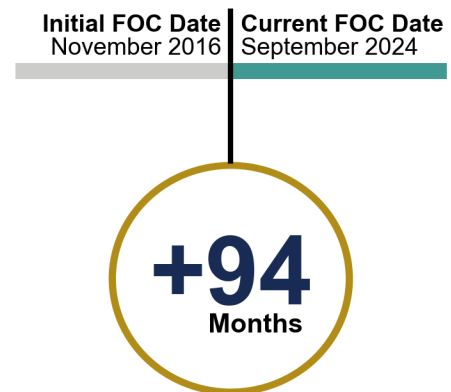
Key Findings

- Cost and Schedule.** The program’s current PC&I cost estimate is \$2.2 billion—over a third less than its current baseline. CBP officials are monitoring a sustainment funding shortage that they expect to cause delays to sustainment capabilities. CBP declared FOC for ACE collections in September 2024 and expects to reach ADE 3 by November 2024—after the baseline threshold.
- Program Management.** In July 2024, DHS approved CBP to initiate ACE 2.0 for ACE IT modernization efforts. However, ACE 2.0 is being managed as part of the existing ACE program and not as a separate program. As a result, CBP will not establish cost and schedule baselines for ACE 2.0, but will rely on semiannual reviews to assess cost and schedule progress.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



Note: ACE achieved FOC in 2018 for all functionality except Collections.

AUTOMATED COMMERCIAL ENVIRONMENT

Program History and Acquisition Strategy

Beginning in 2001, CBP designed ACE to replace legacy import and export systems with a modern, automated system to increase the efficiency of operations at U.S. ports and to enable faster decision-making. In 2009, CBP halted ACE development and placed the program into breach status because of cost and schedule growth. In 2013, after CBP adopted an Agile process, DHS removed the program from breach status. In that same year, DHS approved the program's ADE 2B. In 2017, the program reported a second cost and schedule breach. Following that breach, CBP separated the system's functionality into ACE Core and ACE Collections. DHS approved ACE Core for FOC and subsequently deployed it in 2018. CBP planned to develop and deploy Ace Collections incrementally through seven releases. In 2019, DHS approved the ADE 2B for Collections software Release 1 and later that year Collections achieved IOC. In 2020, DHS approved ADE 2B for Collections software releases 2 through 7.

Cost and Schedule Status

In November 2023, the program deployed Collections software Release 7. This was the final release needed for CBP to retire the existing legacy system. In September 2024, ACE declared FOC and the program expects to reach ADE 3 by November 2024—2 months after the baseline threshold. Program officials said the delay was due to DHS scheduling availability.

Program officials said that they are monitoring a \$40 million O&S shortfall. According to officials, they expect the shortfall to result in: (1) reduced report functionality; (2) delays to the Cloud migration schedule and other enhancement efforts; (3) increased security failures; and (4) additional costs to maintain legacy systems. Officials said they plan to address the shortfall by prioritizing the most critical needs and pushing other efforts to future years. Officials also plan to submit a request for a supplementary budget and technical assistance package.

Previously, we reported that the program updated its APB to reflect changes made to the program life-cycle costs but had yet to receive approval from DHS leadership for this update. In March 2024, DHS approved the program's latest APB, which reflected the changes made to the program's schedule in addition to the life-cycle cost estimate. The program updated its schedule, but did not make any changes to its PC&I and O&S cost estimates with this update. The program's current PC&I cost estimate is \$2.2 billion, which is over a third less than its current baseline.

Performance and Testing

In October 2024, a CBP operational test authority determined that ACE Collections was operationally cyber resilient with limitations and made five recommendations to address identified vulnerabilities. Program officials said they are taking steps to address the recommendations, such as facilitating additional cyber testing. The program also conducted penetration testing for ACE Collections within the Cloud system in January 2024. Program officials said that there was only one finding, which the ACE Cloud team has already remediated.

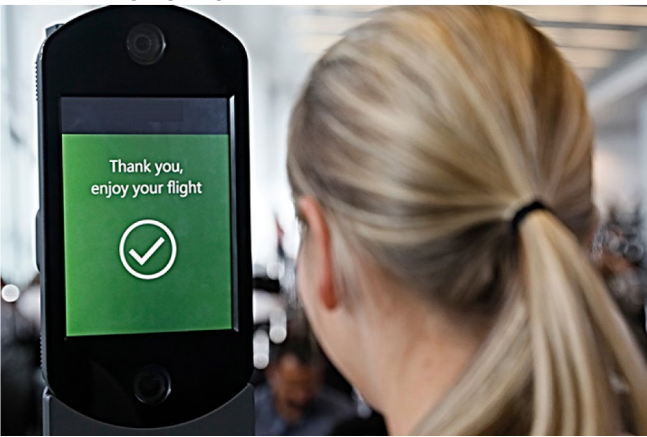
In July 2024, the same test authority determined that ACE Collections was operationally effective and suitable based on its June testing, but made six recommendations. Specifically, the test authority found that: (1) six of seven critical operational issues were fully met, and one was partially met; and (2) three of four KPPs were met, and one was partially met. The test authority recommended, among other things, that the ACE program develop guidance for Collections business processes. Program officials said that they do not agree with the assessment on the partially met operational issue and plan to address this with DHS. According to program officials, they delayed this testing—previously scheduled for February 2024—by 4 months due to independent test team staffing and funding issues. Program officials said they do not anticipate that the testing delay or the testing findings will delay the program's ability to reach FOC on schedule.

Program Management

In July 2024, DHS approved CBP to initiate ACE 2.0. According to officials, ACE 2.0 will focus on automation needs for Core capabilities related to modernizing customs processes, and allow for full supply chain transparency. ACE 2.0 will not be a separate acquisition program but will be part of the existing ACE program. As a result, ACE will return to DHS's Acquisition Review Board by March 2025 to present the plan for the ACE 2.0 scope of work. CBP's ACE 2.0 approach will not establish cost and schedule baselines, but will track cost and performance throughout the year and report on them at semiannual reviews. We will continue to monitor ACE 2.0 and identify any potential risks with its acquisition approach.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. The ACE program said that it will continue to request required funding for both ACE and ACE 2.0 Modernization. We included updated information for key events that occurred after September 2024 to the extent that it was provided by CBP.



Biometric Entry-Exit

BE-E is developing capabilities to match travelers to photos in DHS's databases through its Traveler Verification Service as they enter and exit the U.S. at air, sea, land vehicle, and land pedestrian ports of entry. CBP plans to implement BE-E in segments that align with those environments. The program deployed the air segment in 2021 and is currently focused on the sea segment. The equipment that captures biometric photo data for the air and sea segments will be owned and operated by airlines and cruise lines. Our assessment primarily focuses on the sea segment.

Source: CBP. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: IT

Acquisition Level: 1

Key Performance Parameters: 4 out of 4 met for the air segment; 4 out of 4 met for the sea segment.

Number of prime contractors: 7

Contracting approach: The program has used multiple contracts to procure goods such as camera and IT services, as well as identity verification.

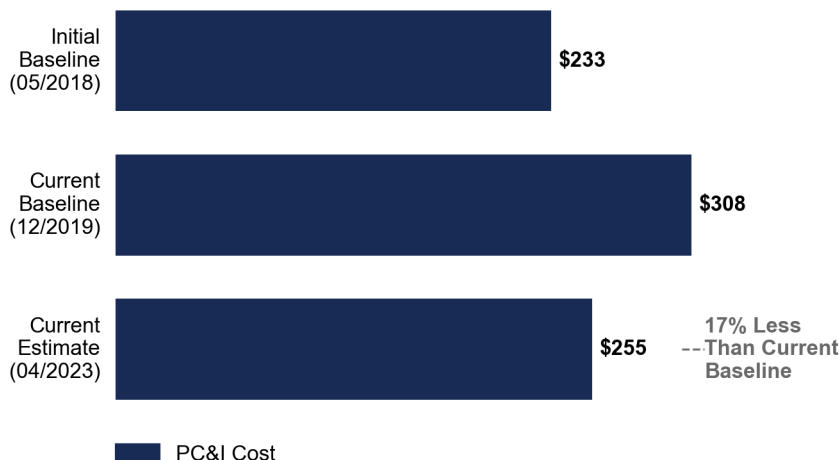
Life-cycle path: System/Product Development

Next major milestone: Sea segment ADE 2A/3 is to be determined

Key Findings

- Cost and Schedule.** According to program officials, funding challenges continue due to lower than expected fee collections from visa applications. This has led, in part, to schedule delays. In addition, the fee increase that funds the program is scheduled to end in fiscal year 2027, and as a result, program officials are developing a proposal to gradually reduce the program's scope. A reduction in scope may also help reduce program costs.
- Performance and Testing.** OT&E completed in fiscal year 2023 found the program to be effective in supporting biometric processing for the sea segment. According to program officials, they will continue to monitor the KPPs for the sea segment until after the program reaches approval of full-scale production and deployment at ADE 3.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months

Note: Program's current acquisition program baseline does not include milestone dates for future events in the sea or land segments.

BIOMETRIC ENTRY-EXIT

Program History and Acquisition Strategy

In 2015, Congress authorized an increase in certain visa application fees over a period of 10 years, with a portion of the increased fees—up to \$1 billion—set aside for the implementation of the BE-E program. Congress initially authorized the fee increase through fiscal year 2025 and later extended it through fiscal year 2027. DHS originally planned to collect fees on new visa applications and applications for visa extensions, but after two federal courts stopped the agency from implementing this approach, fees were collected only on new applications. Prior to ADE 3—approval of full-rate production and deployment—for the air segment, the program breached its cost and schedule baselines. According to program officials, this was due to delays in completing testing and an update to the program's LCCE. In December 2019, the program updated its acquisition program baseline document, which removed the program from breach status.

Cost and Schedule Status

The program continues to face funding challenges due to receiving fewer visa application fees than expected. Additionally, program officials stated that total costs for fiscal year 2024 are greater than \$67 million, but they collected approximately \$17.5 million in visa application fees in the same time frame. In 2016, the Congressional Budget Office originally projected that approximately \$115 million per year would be available to the program through fee collection. To help cover costs, the program aims to leverage additional funding from another CBP program and to shift some technology development efforts to other DHS biometric initiatives. Program officials stated that their additional strategies for reducing program costs include descoping capabilities for exit scanning.

The fee increase that funds the program is scheduled to end in fiscal year 2027. According to program officials, they are currently working on a proposal that will describe a gradual reduction in staff and capabilities, outline rescoping options, and determine what the program can accomplish between fiscal years 2025 and 2027. The anticipated lack of future funding and current funding challenges may prevent the program from completing the land vehicle segment, according to program officials.

According to program officials, the program did not achieve ADE 2A/3 for the sea segment in fiscal year 2024 as they had planned and a new date for that milestone is to be determined. They further stated that the ongoing funding issues caused delays in progress. Program officials also told us that a January 2024 CBP-level meeting resulted in actions for the program to complete, such as providing solid information about the program costs for the traveler verification service, before moving forward to the ADE 2A/3 milestone.

Additionally, program officials stated that they need to complete an affordability analysis to show how they plan to conduct the program moving forward with the funding resources available. These officials further explained that the affordability analysis will inform other document updates such as the acquisition program baseline, which is needed for the ADE 2A/3 milestone.

Performance and Testing

The program met its KPPs for the air segment in December 2019. The operational requirements document was updated in November 2022 to include requirements for the sea segment. This included one new KPP related to interoperability, and adjusted threshold and objective rates for the other KPPs based on testing conducted for the air segment.

OT&E for the sea segment, held between April and May of 2023, found the program to be effective and suitable to support biometric processing. The operational test authority made two recommendations to the program, including that it should conduct a follow-on OT&E event to further evaluate some of the program's capabilities. According to program officials, data from their weekly operational status checks show that the program is meeting its KPPs.

Program Management

The program continues to face non-critical staffing shortfalls, and is using staff support from other areas of CBP and leveraging contractor support where possible.

The program uses an Agile methodology for its software development. According to program officials, they officially seek user feedback from officers going through training and informally through industry partners to help improve the program.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. Program officials stated that they are attempting to reduce program costs to bring the program into alignment with current and projected available resources. Additionally, the program office provided technical comments, which we incorporated where appropriate.



Source: CBP. | GAO-25-107317

Common Operating Picture

COP aims to integrate existing U.S. Border Patrol sensor systems to provide an efficient method for viewing activity at U.S. borders and improve information management, situational awareness, and decision-making capabilities. COP will analyze sensor data to identify and classify detections as potential threats or items of interest. Border Patrol agents will use these data to inform their response and resolution, when necessary. The program will provide a software solution that can be integrated with existing and future sensors and any other IT required to be operated at the command and control facility. COP is currently planned in four Agile themes, which are iterative increments that build upon each other.



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: IT

Acquisition Level: 2

Key Performance Parameters: Testing of the program's 4 KPPs has not begun.

Prime contractor: Contract not yet awarded

Contracting approach: According to CBP officials, COP intends to leverage existing General Services Administration contracts and strategic sourcing to pursue any necessary technology, to include software development, servers, workstation hardware, and IT infrastructure upgrades for the command and control center.

Life-cycle path: Incremental software development

Next major milestone: ADE 2A by June 2025

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate. According to program officials, the program received authority to operate at one site as of October 2024 but is waiting on fiscal year 2025 funding to begin operations.

Current Status

CBP reported that it paused COP activities and delayed ADE 2A to June 2025, a 15-month slip since our last assessment, because the program did not receive fiscal year 2024 PC&I funding. Program officials told us that COP plans to pause developmental activities until March 2025, when the program expects to receive information about fiscal year 2025 PC&I funding. Program officials explained that without PC&I funding, COP is no longer considered affordable, which is a requirement DHS formally approves at ADE 2B.

Program officials are revising COP's \$301 million life-cycle cost estimate to reflect the program's funding status. To mitigate funding risks, program officials submitted a \$9.5 million internal reprogramming request for fiscal year 2024, but CBP denied that request.

The COP program manager told us the program's pause delayed the development of the first two Agile themes. This official anticipates developing COP's theme 1—which aligns with IOC—in late fiscal year 2025. They also stated that theme 2—which supports the Integrated Surveillance Towers (IST) program rollout—will be postponed until after IST's initial deployment of 15 towers in the summer of 2025.

COP continued with integration risk reduction activities through 2024. The program manager said they completed the higher risk activities of theme 2, such as testing, to ensure that the sensors from IST's three contractors were viable for production.

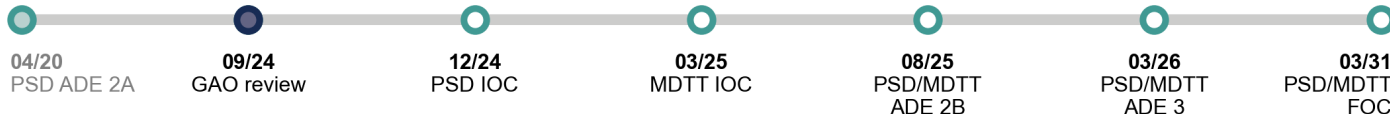
According to the program manager, COP is managing risk with advanced data analytics algorithms that support the program's mission. The algorithms are expected to use machine learning and artificial intelligence to identify humans and animals, among other things. One of COP's KPPs, which has not yet been tested, focuses on these algorithms. Further, the program manager said the algorithms' forecasting and correlation abilities were at risk of not functioning, but they were using fiscal year 2023 funding to mitigate any risk-related effects.



Source: CBP. | GAO-25-107317

Cross Border Tunnel Threat

CBTT is intended to help U.S. Customs and Border Protection monitor subsurface activity along the U.S. land border and to detect and remediate cross border tunnels. CBTT is comprised of two underlying efforts: (1) Persistent Surveillance and Detection (PSD) provides continuous subsurface detection capability through permanently installed technology; and (2) Mobile Detection Tunnel Toolkit (MDTT) is a suite of handheld and portable tools that provides enhanced detection capabilities for the local geology in areas with and without a deployed PSD system. The program is planning the two efforts separately until it reaches IOC and milestone events will be combined thereafter.



Program Information

Component: U.S. Customs and Border Protection (CBP)
Acquisition Type: Mixed (IT/Non-IT)
Acquisition Level: 1
Key Performance Parameters: Testing for the PSD KPPs is underway.
Prime contractor: Contract not yet awarded
Contracting approach: As of 2020, contracts were awarded to three vendors that have the potential to meet persistent surveillance and detection program needs, according to CBP officials and a DHS memorandum. CBTT plans to review the three vendors' offered solutions and select one for award of the PSD production contract.
Life-cycle path: Commercial-Off-the-Shelf /Non-Developmental Items with No Integration Required
Next major milestone: PSD IOC by December 2024

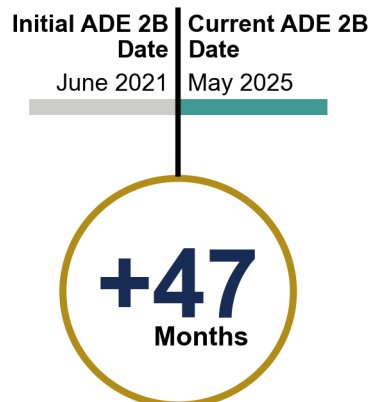
Key Findings

- Cost and Schedule.** Installation of the remaining PSD mileage was delayed from December 2023 to September 2024. This delay resulted in an additional delay to PSD's IOC, which is now projected for December 2024, 1 year later than planned. In February 2024, DHS approved ADE 2A for MDTT, which allowed the program to procure two toolkits. While the program has not formally updated its cost estimate since January 2023, CBTT officials told us that the estimate is consistent with last year's.
- Testing.** Testing for PSD's KPPs is underway. Program officials reported the completion of the first week-long test event for PSD in March 2024 and that only expected limitations occurred. In addition, CBTT officials said that they expect all of the 1-year operational use periods—evaluation periods that support future deployment decisions—to be complete by February 2025. The program also added a new KPP for MDTT.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



Note: New program capabilities were added after the original milestone date was set.

CROSS BORDER TUNNEL THREAT

Program History and Acquisition Strategy

CBP initiated the CBTT program in 2015 after it identified a mission deficiency in its ability to predict, detect, and track subterranean activity or operations. CBP established the preliminary baseline for the PSD effort in December 2019. Then, DHS approved ADE 2A for PSD in April 2020. In August 2022, over 2 years later, program officials updated the program's LCCE to include the MDTT capability. In December 2022, CBP revised the program's preliminary baseline to include the new capability and also to decrease the required mileage to achieve FOC from 99 to 36 miles. The decrease from 99 to 36 miles is based on gathered intelligence and tunnel operation metrics.

Cost and Schedule Status

Since our last assessment, the program delayed installing the PSD mileage required for IOC by 9 months. The program had expected to complete installation by December 2023 but instead finished in September 2024, according to CBTT officials. Program officials told us that the additional delay was due in part to deliberate sabotage by smugglers. They said that CBP is currently installing additional security around the damaged area. Program officials stated that the cost impact of the damage was about \$75,000. They also noted that infrastructure issues in old buildings, such as air conditioning outages, also caused installation delays. They explained that due to these delays, the program plans not to declare IOC until December 2024. In addition, the program delayed the combined ADE 2B for PSD and MDTT by 3 months, from May 2025 to August 2025.

The program achieved ADE 2A for MDTT in February 2024 as planned. At that time, DHS authorized the program to procure two toolkits. According to program officials, MDTT is expected to achieve IOC in March 2025. The program currently plans to declare FOC in March 2031.

While the program has not formally updated its cost estimate since January 2023, officials noted that the estimate is consistent with last year's.

Performance and Testing

The program began testing PSD's capabilities through operational use periods and test events. Officials said that each PSD section will have a 1-year operational use period as well as 1 week of physical testing. Program officials stated that they have obtained helpful data from the operational use periods so far. In some cases, they said that the program was able to use those data to identify streamlining opportunities. Program officials expect all PSD operational use periods to be complete by February 2025. After the operational use periods are complete, the program plans to down select from its three vendors to one vendor for production based on performance data obtained during the operational use periods.

Program officials reported the completion of the first test event for PSD in March 2024 and that only expected limitations occurred during the test.

According to officials, the MDTT commercial technology is in the beginning stages of procurement. The program updated its operational requirements document in August 2023 to include a new KPP for MDTT. That KPP will not be tested until after September 2024, according to officials. Those officials also stated that the program is still planning to conduct a 1-year user evaluation during which end users of the MDTT technology will be able to provide feedback on whether the technology is viable for its specified use.

Program Management

CBTT continues to face funding challenges, and has had to defer some work as a result, according to officials. Program officials also noted that the fiscal year 2025 President's budget does not include any PC&I funding for the program.

Program officials did not identify any significant cybersecurity risks. They noted that the biggest potential risk would be from an insider threat. In addition, the servers facilitating the connection between PSD, MDTT, and CBP are at risk of being hacked, so the program is working closely with the Office of Information Technology to mitigate threats.

Program Office Comments

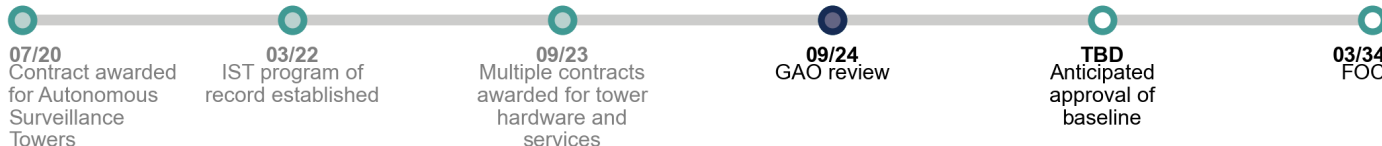
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Integrated Surveillance Towers

The IST program consists of over 800 fielded towers located along U.S. borders that detect items of interest, such as people or vehicles. The program includes towers from four legacy systems: (1) Autonomous Surveillance Towers, (2) Integrated Fixed Towers, (3) Remote Video Surveillance System, and (4) the Northern Border Remote Video Surveillance System. IST will continue to procure, deploy, and maintain tower systems approved under the legacy programs. Additional deployments will be approved under the new program. IST will integrate with CBP's Common Operating Picture (COP) program to ensure U.S. Border Patrol's command and control centers can access the surveillance data.

Source: CBP. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)
Acquisition Type: Mixed (IT/Non-IT)
Acquisition Level: 1
Key Performance Parameters: 3 out of 3 met for legacy towers; testing for future IST deployments has not begun.
Prime contractors: Anduril Industries, for the Autonomous Surveillance Towers; 3 vendors will compete for future delivery orders of remaining IST equipment
Contracting approach: IST awarded indefinite-delivery, indefinite-quantity contracts in September 2023 to three separate vendors for hardware procurement and deployment, among other activities, in addition to the program's contract with Anduril Industries.
Life-cycle path: Commercial Off-the-Shelf/Non-Developmental Item with Integration
Next major milestone: DHS approval of APB; date is TBD

Key Findings

- Cost and Schedule.** IST program officials have been preparing an APB since 2022 and estimate approval by 2025. The program had to account for the purchase of 175 additional Autonomous Surveillance Towers approved by DHS with funding received since fiscal year 2022. Going forward, DHS will not allow the program to procure any additional towers until it establishes the APB.
- Performance.** IST program officials told us that lack of funding has affected the availability and operability of towers. The officials told us that the average availability for two tower types between October 2023 and March 2024 did not meet the operational requirement.
- Program Management.** The IST program continues to face risks with COP software integration. Program officials told us they do not plan for COP to integrate with the first delivery order of towers because of COP's lack of fiscal year 2024 PC&I funding.

BASELINE AND CURRENT COST ESTIMATES dollars in millions

SELECTED MILESTONE DELAY in months

Initial Baseline (TBD)	Not yet approved	
Current Baseline (TBD)	Not yet approved	
Current Estimate (01/2023)		\$1,336

■ PC&I Cost

Note: program documentation does not have clear milestone dates for comparison.

INTEGRATED SURVEILLANCE TOWERS

Program History and Acquisition Strategy

In March 2022, DHS consolidated four legacy tower systems and established IST as a program of record. IST currently has over 800 fielded towers and plans to deliver another 175. In August 2024, DHS approved CBP's request to purchase up to 42 additional Autonomous Surveillance Towers—as part of future deliveries—with \$34 million in fiscal year 2024 funding. DHS previously approved CBP's request to purchase up to 133 additional towers, in total, between 2022 and 2023. IST already achieved ADE 3 because CBP deployed all previously approved towers since 2021. The program plans to achieve FOC in March 2034, at which point it expects to have deployed 350 towers that meet the KPPs.

Cost and Schedule Status

Since its establishment in 2022, IST has not had a DHS-approved APB. DHS approved the program to purchase 175 additional towers beyond those authorized under the legacy programs due to funding received in fiscal years 2022 through 2024. As of August 2024, DHS will not permit the program to procure any additional towers beyond the 175 previously approved until the program establishes its APB and other supporting documents, such as the life-cycle cost estimate. IST program officials plan to establish the consolidated APB in March 2025. According to IST program officials, DHS has not yet approved the program's 2024 life-cycle cost estimate that will reflect its APB.

Program officials told us that they awarded contracts to three vendors for five towers each (15 in total) in September 2024. However, program officials said that as a result of delays in receiving the funding due to the continuing resolution, IST is incurring a month-to-month slip on time frames for purchase and fielding. Currently, IST program officials plan to field these towers in the summer of 2025. Additionally, program officials told us that they will delay tower purchases and deployments and postpone sustainment activities due to the timing and decreased amounts of funding received.

Performance and Testing

According to IST program officials, decreased funding reduced tower operability and prevented the program from consistently meeting its operational availability requirement. Lack of funding limits the program's ability to conduct technology refreshes on and repair towers that fail, potentially leading to the risk of obsolescence and towers being nonoperational. Officials said that between October 2023 and March 2024, average availability for two tower types did not meet the threshold of 94 percent availability at all times. IST program officials said that they are prioritizing service orders so when funding is available, they can make high priority repairs. In addition, these officials told us they are working to improve the availability of spare parts, which would markedly improve tower performance.

IST's November 2021 operational requirements document identifies three KPPs for detection, availability,

and data transmission rate. IST will not develop or procure any new capabilities beyond those in existing tower configurations. IST's November 2022 test strategy identifies test activities to manage technical risks associated with integration between the separate IST and COP programs.

Program Management

IST's required integration with COP software remains at risk. According to IST program officials, contractors will field 15 towers in summer 2025 as part of the first delivery order in the September 2023 contract. However, due to lack of fiscal year 2024 PC&I funding for the COP program, IST officials said they do not plan for COP to integrate with the 15 towers in the first delivery order. These officials said they anticipate that the second delivery order will integrate with COP. Further, IST officials are no longer planning for the second delivery order to occur by December 2025. This timing is dependent on funding and the status of the first delivery order.

The IST program is also facing workforce challenges. Program officials told us that they have four vacancies in their program office, including the director. According to IST program officials, they do not have an estimated date for replacing the director, but they have filled one of two sustainment roles and are in the process of filling the other vacancy.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Light Enforcement Platform

The LEP program plans to provide CBP’s Air and Marine Operations (AMO) with additional light enforcement aircraft to include helicopter, fixed wing, and uncrewed capabilities. AMO currently has a fleet of approximately 120 single-engine crewed aircraft that aid in conducting airborne surveillance and transportation activities along the northern and southern U.S. borders. LEP plans to address coverage gaps in the southwest and northern borders. In addition, LEP expects to deliver critical sensors, interoperability, and cybersecurity capabilities to augment the existing light helicopter fleet. The current LEP configuration is procuring helicopters and gradually replacing the aging light enforcement helicopter fleet.

Source: AMO. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: Non-IT

Acquisition Level: 1

Key Performance Parameters: KPPs not yet tested.

Prime contractor: Davenport Aviation, Inc.

Contracting approach: The program is acquiring standardized commercial off-the-shelf helicopters from the General Services Administration federal supply schedule.

Life-cycle path: Commercial Off-the-Shelf/Non-Developmental Item with Integration

Next major milestone: ADE-2B (helicopter) by June 2025

Key Findings

- Cost and Schedule.** DHS approved the LEP program to use fiscal year 2024 funding to procure its helicopter configuration, with estimated production costs for all 58 helicopters to be over \$480 million. The program was originally scheduled to deliver the first helicopter in August 2025, but in order to complete the Federal Aviation Administration’s (FAA) certification process for modified helicopters, the program delayed delivery to February 2026. As a result, program officials now anticipate OT&E will occur later into 2026. ADE 2B for the helicopter configuration is now expected to occur by June 2025, a 6-month delay from prior plans.
- Program Management.** Over the past year, the LEP program filled previously vacant positions, including a Deputy Program Manager. Officials do not project additional staffing gaps.

BASELINE AND CURRENT COST ESTIMATES dollars in millions

SELECTED MILESTONE DELAY in months



LIGHT ENFORCEMENT PLATFORM

Program History and Acquisition Strategy

The LEP helicopter is one of three platforms in the overall LEP program. CBP's Air and Marine Operations has a fleet of approximately 120 light enforcement helicopters and fixed winged light enforcement aircraft, plus a new requirement for a total of 58 light enforcement helicopters. In 2023, DHS approved the purchase of 58 LEP helicopters to add to CBP's current fleet of 26 light enforcement helicopters, totaling the 84 helicopters required for full operational capability. The new H125 LEP helicopters are updated versions of CBP's currently used AS350 aircraft and will eventually replace them. The new aircraft features improved safety and mission equipment while conforming to existing standardized maintenance, logistics, and training. The LEP program intends to purchase the H125 helicopters through the General Services Administration federal supply schedule, using firm-fixed-price orders. Two remaining future platforms include a fixed wing aircraft and an uncrewed aerial system.

Cost and Schedule Status

In September 2023, DHS leadership approved the program's initial LCCE. Officials estimate total production costs for 58 operationally ready helicopters to be over \$480 million, or approximately \$8 million each. This estimate includes the basic H125 helicopter as well as required mission equipment needed for law enforcement use such as a camera and a GPS antenna. In addition, the program is investing in additional capabilities like an autopilot feature and Ground Datalink Station.

Of the current fleet of 26 light enforcement helicopters, the final two helicopters were delivered in late 2023. Additionally, in September 2023, the program placed an order for the first of the 58 new helicopters prior to achieving ADE 2A. It did so due to safety concerns with the older AS350 aircraft, which lacked crash-resistant fuel tanks.

In December 2023, the program achieved ADE 2A as planned, which allowed it to begin contracting activities. This included the use of fiscal year 2024 funds to start procuring H125 helicopters in accordance with the program's acquisition strategy. The current LCCE reflects a LEP helicopter fielding schedule that includes ordering between four and five helicopters each year starting in fiscal year 2025. Additionally, according to the LCCE, annual deliveries included two aircraft in fiscal year 2025 and four to five aircraft starting in fiscal year 2026, with deliveries ending in fiscal year 2037.

However, program officials stated that delivery of the first two LEP helicopters has slipped 6 months due to activities related to FAA certification processes. As a result, the first helicopter will now be delivered by February 2026 instead of August 2025. Program officials said that obtaining FAA's certification of its commercial aviation platforms can cause delivery delays as the FAA must approve the design of the aircraft and all component parts to signify compliance. Program officials explained that due to the FAA's certification process, ADE 2B for the helicopters is now expected by June 2025 instead of December 2024 as initially planned.

Performance and Testing

Operational testing has yet to occur as the program has not received its first LEP helicopter. Program officials said that they expect delivery of the first helicopter by February 2026 and expect operational testing to occur in the following months. They also said that once the first helicopter is delivered, acceptance testing will begin to confirm all contractual requirements are met. Program officials explained that the preliminary design review occurred prior to ADE 2B and addressed each of the KPPs, which they will test during acceptance testing.

Program officials do not have cyber security testing planned. However, according to the current Test and Evaluation Master Plan, future cyber resiliency testing will include a cyber tabletop exercise, Cyber Vulnerability Threat Assessment, and an Adversarial Assessment.

Program Management

LEP officials stated that they filled the vacant positions we previously reported on and do not anticipate additional staffing gaps. According to these officials, the program hired necessary staff, including a deputy program manager, between October 2023 and June 2024.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Medium Lift Helicopter

CBP uses MLH for law enforcement and border security operations; air and mobility support and transport; search and rescue; and other missions. The MLH program acquired existing helicopters from the U.S. Army and will convert HH-60Ls to UH-60Ls, provide logistical sustainment support for the entire fleet, and store the aircraft. The conversion involves two steps: (1) deconfiguring all military equipment, and (2) reconfiguring aircraft with CBP-unique equipment, instruments, and sensors. The current MLH fleet consists of 35 total aircraft acquired in three different models: 16 UH-60A, four UH-60M, and 15 HH-60L.

Source: CBP. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: Non-IT

Acquisition Level: Level 1

Key Performance Parameters: 5 of 5 KPPs met.

Servicing Agency: U.S. Army Utility Helicopter Project Office, which contracts with selected vendors.

Contracting approach: The program has an interagency agreement with fixed prices with the Army for aircraft acquisition, modification, and support activities. Officials reported that all contract awards made by the Army are cost-plus-fixed-fee.

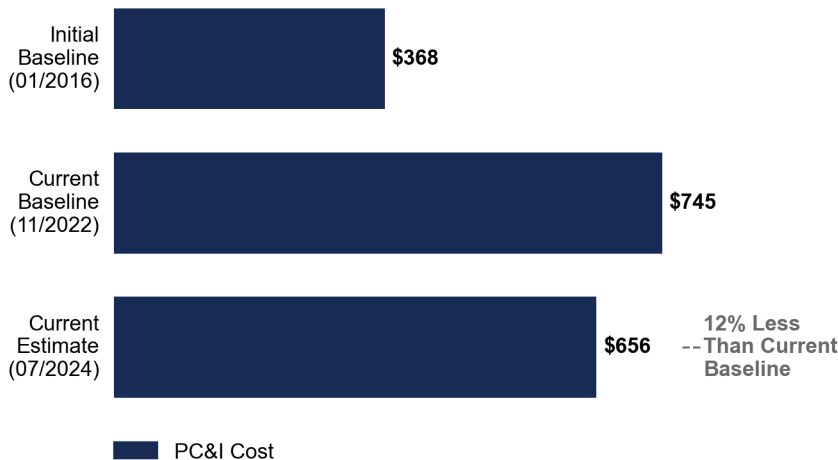
Life-cycle path: Commercial Off-the-Shelf and Government Off-the-Shelf/Non-Developmental Item with Integration

Next major milestone: FOC of 35 aircraft by September 2028

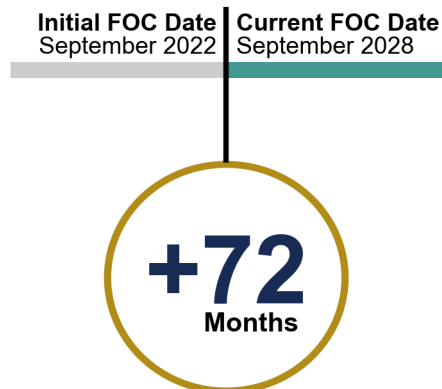
Key Findings

- Cost and Schedule.** Current estimated program costs are approximately \$656 million, which is 12 percent less than the current baseline. Delivery of three HH-60L aircraft, previously expected in fiscal year 2024, has been delayed to at least fiscal year 2025 due to a lack of fiscal year 2024 funding. CBP officials plan to discuss the program’s path forward in fiscal year 2025, to include potentially declaring a schedule breach. Program officials also plan to reprioritize existing funding to complete those three aircraft while a decision on the subsequent aircraft will be made in fiscal year 2025.
- Program Management.** Program officials identified funding and availability of the aircraft’s navigation systems as primary program risks. The program has faced difficulties in acquiring new parts for its MLH aircraft, so it is using parts from 22 decommissioned Army Black Hawks to support its fleet.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



Note: Program rebaselined to increase quantities and extend FOC.

MEDIUM LIFT HELICOPTER

Program History and Acquisition Strategy

The MLH program established its initial baseline in 2016 and has rebaselined twice, most recently in 2022, to increase quantities and extend FOC from 2022 to 2028. As part of the 2022 rebaseline, DHS approved an increase of FOC quantities from 20 to 35 aircraft and baseline acquisition costs from \$367.7 million to \$745.3 million. CBP acquired four modern UH-60M aircraft and converted six of its 16 older UH-60A aircraft into the more capable UH-60L models. It is also acquiring 15 reconfigured Army HH-60L aircraft—to be converted to UH-60L models—and pursuing a replacement solution for the remaining 10 older UH-60A aircraft. In August 2023, the MLH program entered into a new interagency agreement with the Army with performance through August 2028.

Cost and Schedule Status

Current program cost estimates are approximately 12 percent less than the current baseline. Program officials stated that they will continue requesting the PC&I funding identified in their current APB.

As reflected in the explanatory statement accompanying the Further Consolidated Appropriations Act, 2024, the program did not receive any PC&I funding. Due to this lack of fiscal year 2024 funding, program officials stated there is uncertainty in meeting the program's aircraft quantities and achieving its FOC date in September 2028. During a recent portfolio review, program officials discussed the possibility of declaring a schedule breach, but said that they plan to defer the decision to fiscal year 2025 to see if the program will receive any 2025 funding.

Program officials reported that HH-60L 8 and 9 were delivered in September 2023 and March 2024, respectively, while aircraft 10, 11, and 12 have experienced schedule delays until at least 2025. Program officials added that aircraft 10 is scheduled to be delivered in January 2025. While funding was not received for aircraft 10, 11, or 12 in fiscal year 2024, program officials said that they will prioritize funding from previous fiscal years to complete aircraft 10, 11, and 12 and will fund aircraft 13 in fiscal year 2025.

Program officials explained that once the program reaches FOC, they will pursue other options for replacing their 10 oldest UH-60A aircraft. The replacement process will be event-driven and conducted year by year. Program officials specified that because the replacement schedule is notional, the program reports a flat budget for out years, which would support one UH-60A replacement per year until 2037. To fund the 10 replacement UH-60As, the program will use PC&I funding.

Performance and Testing

The program met all five of its KPPs in February 2018 and is currently waiting on delivery of the final six HH-60L aircraft from the Army.

The MLH program conducts frequent aircraft inspections. Program managers explained they conduct inspections every 480 flight hours. This allows the program to

anticipate repair issues to ensure that the aircraft remains safe to fly as required by the program's operational requirements.

Program Management

In addition to funding, program officials identified the availability of the aircraft's navigation system as a primary risk. To mitigate this risk, the program is exploring options to either purchase a replacement MLH navigation system or certify a new item through the Army's engineering team. Program officials added that, due to budget restrictions, it is difficult to acquire new items for the MLH aircraft. As a result, they are looking to recertify the Garmin 750, which is the primary GPS navigation component of the MLH.

Program officials said that during the 2022 withdrawal of U.S. troops from Afghanistan, CBP obtained 22 decommissioned Army UH-60A Black Hawks. Twelve of the aircraft were deconstructed for components and the remaining 10 Black Hawks will be used for future replacement activities. In addition, officials stated the Army is in the process of replacing its UH-60Ls with UH-60Ms; MLH program officials believe they may be able to use some of the retired UH-60L airframes and parts.

Program Office Comments

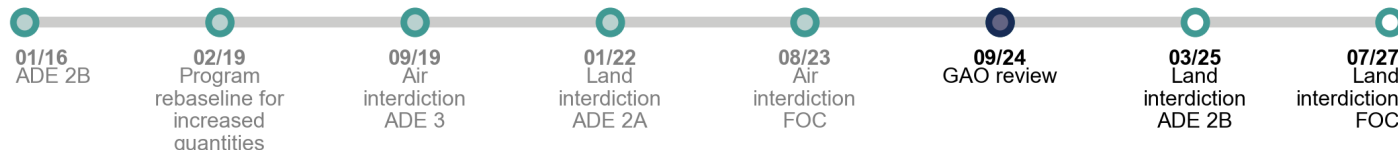
We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Multi-Role Enforcement Aircraft

MEA are fixed-wing, multi-engine aircraft that can be configured to perform multiple missions. Each MEA is equipped with a search radar and an electro-optical/infrared sensor to support maritime surveillance and airborne and land tracking missions. MEA are intended to replace CBP's fleet of aging C-12, PA-42, and BE-20 aircraft. CBP is acquiring MEA in four different configurations: (1) maritime interdiction, (2) air interdiction, (3) land interdiction, and (4) technical collections. Each has its own acquisition milestones, but a combined program cost baseline. Our assessment includes information on all four configurations but focuses primarily on the land interdiction configuration, which is approaching ADE 2B.

Source: CBP. | GAO-25-107317



Program Information

Component: U.S. Customs and Border Protection (CBP)

Acquisition Type: Non-IT

Acquisition Level: 1

Key Performance Parameters: Maritime Interdiction: 5 of 5 met; Air Interdiction: 2 of 2 met; Land Interdiction: Testing of 4 KPPs has not begun.

Prime contractor: Science and Engineering Services

Contracting approach: The program awarded an indefinite-delivery, indefinite-quantity contract for production of the Land Interdiction aircraft in September 2022, which includes firm-fixed-price and time and material line items.

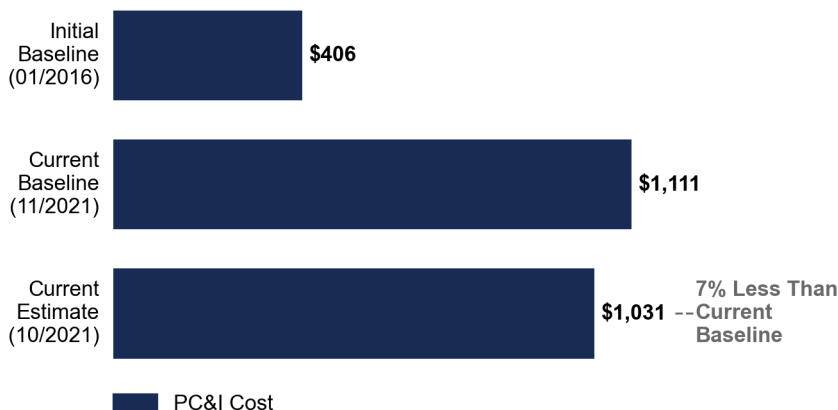
Life-cycle path: Commercial Off-the-Shelf/Non-Developmental Item with Integration

Next major milestone: ADE 2B (Land Interdiction) by March 2025

Key Findings

- Cost and Schedule.** Planned acquisition costs have increased from the initial baseline because of additional configurations. Delivery of the first land interdiction aircraft has slipped due to supply chain issues and is now expected by December 2025. Delivery of the second aircraft is now expected by June 2026. The program delayed ADE 2B a third time due to finalizing its Test and Evaluation Master Plan.
- Program Management.** The program is hiring program and deputy program managers, which may take up to 12 months. Program officials said training and transfer of responsibilities for recently hired positions can take up to 2 years.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



Note: Current baseline includes preliminary estimates for Land Interdiction configuration.

SELECTED MILESTONE DELAY in months



MULTI-ROLE ENFORCEMENT AIRCRAFT

Program History and Acquisition Strategy

The MEA program started as part of CBP's Strategic Air and Marine Plan fleet modernization program in 2008 and was separated to become its own program in 2016 when its initial baseline, for the maritime interdiction configuration, was approved. The program subsequently rebaselined twice to incorporate two follow-on configurations—the air and land interdiction aircraft. The program is currently comprised of three configurations and will total 35 aircraft: maritime interdiction (16), air interdiction (13), and land interdiction (six). Both the maritime and air interdiction configurations have achieved FOC. A technical collections configuration will follow the land interdiction configuration after requirements documentation is complete, which CBP officials expect to happen in 2025. For the current land interdiction configuration, the program achieved ADE 2A in January 2022 and awarded an indefinite-delivery, indefinite-quantity contract in September 2022, which consists of a base ordering period and four 1-year ordering periods. Program officials confirmed that delivery orders for the first two land interdiction aircraft were placed in late fiscal year 2022 and in the third quarter of fiscal year 2023. The total performance period for this configuration is from September 2022 through September 2027, while FOC is expected to be achieved in July 2027 when all six land interdiction configurations are received.

Cost and Schedule Status

The program did not achieve ADE 2B or establish a final APB in December 2023 as planned for the land interdiction segment. The program delayed the milestone first to February 2024 and again to September 2024 because of continued staffing shortfalls. According to program officials, these staffing challenges have prevented them from completing the required acquisition documents to achieve ADE 2B. Program officials added that the program has contractor support staff to help draft acquisition documents, but a program manager still needs to review each document. Program officials stated that ADE 2B was delayed a third time due to finalizing the program's Test and Evaluation Master Plan and including cybersecurity scoping for the testing program. It is now expected to be achieved by March 2025.

Since the approval of its initial baseline in 2016, the program has added the air and land interdiction configurations. With the addition of the two new configurations, planned acquisition costs increased from the initial baseline to the current baseline set in 2021. The current baseline includes preliminary costs for the land interdiction increment. Program officials stated that the program is currently estimating acquisition costs above that baseline because of increased inflation rates and lack of price breaks for ordering multiple aircraft, but advised that each of the approved segments is managing within its cost and schedule baseline. Programs officials said they will adjust the LCCE and APB to account for actual cost at ADE 2B for the land interdiction segment.

According to the program's schedule, the program expected to deliver the first land interdiction aircraft in March 2025. Program officials now expect that first aircraft to be delivered by December 2025, a delay of 9 months, due to supply chain issues. The second aircraft is now scheduled for delivery by June 2026.

Performance and Testing

Program officials identified the program's primary risk as the performance of the new radar for the land interdiction configuration, adding that each aircraft configuration requires a specific radar based on its geographic mission. These officials said that to mitigate technical risks, they frequently coordinate with internal subject matter experts who attend performance demonstrations conducted by vendors. They also said that the radar developer completed development of the base-level radar, adding that the subcontractor is also continuing to develop and integrate the radar with the mission management system to meet operational requirements for MEA.

Parameters for the land interdiction configuration have yet to be tested, but the testing will be conducted when operational testing occurs after delivery of the first land interdiction aircraft. Program officials project testing to start in the first quarter of fiscal year 2026, and noted that no cybersecurity activities occurred in fiscal year 2024.

Program Management

Program officials told us they are hiring a permanent program and deputy program manager, which could take up to 12 months. A deputy director from the Tactical Aircraft and Vessel Acquisitions team is currently filling in as the MEA Program Manager. Program officials also stated that they onboarded two new personnel, but the new staff still need to pass background checks and become Level 1 certified before taking on responsibilities. This process can take up to 2 years.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.



Non-Intrusive Inspection Integration

NII Integration aims to connect and integrate NII scanning units with automation tools to increase scanning volume and detection effectiveness. CBP uses large- and small-scale scanning units at land, sea, and air ports of entry. These scanning units examine containers, railcars, passengers, and other items to prohibit potential threats or contraband from entering the U.S. The legacy NII system architecture operates as a stand-alone scanning capability limited to low-volume and targeted scanning. The NII Integration program will leverage artificial intelligence as applicable and when it is mature, it will enhance NII systems scanning capabilities. This assessment does not include the NII Systems program.

Source: CBP. | GAO-25-107317



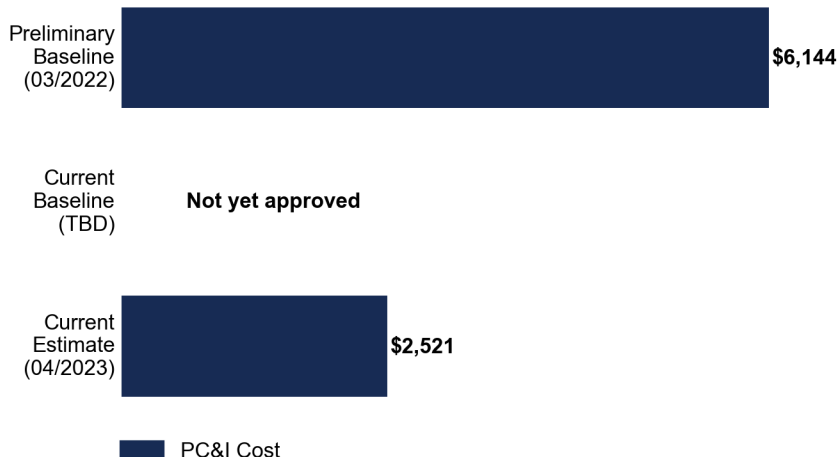
Program Information

Component: U.S. Customs and Border Protection (CBP)
Acquisition Type: Mixed (IT/Non-IT)
Acquisition Level: 1
Key Performance Parameters: Testing of the program's 4 KPPs has not begun.
Prime contractor: Contract not yet awarded. Program officials reported that NII Integration does not yet have a prime contractor because the program is pre-ADE 2B.
Contracting approach: In support of pre-ADE 2B activities, the program reported awarding two contracts in September 2023 and one contract in November 2023 to support anomaly detection. The program reported awarding an additional contract to conduct independent review of systems and design.
Life-cycle path: Incremental Software Development
Next major milestone: ADE 2B by March 2027

Key Findings

- **Cost and Schedule.** NII Integration delayed its ADE 2B date from March 2025 to March 2027 to revisit its scope and requirements. The current cost estimate is reduced from the preliminary baseline, but program officials shared that the cost estimate needs further updating given recent changes.
- **Performance and Testing.** NII Integration officials are clarifying the definition of program success as they update the program's scope and requirements. Testing has not yet been scheduled.
- **Program Management.** DHS decided to operate NII Integration and NII Systems as separate programs, according to program officials. NII Integration officials took steps to improve future program efficiencies, such as transitioning the program to a single increment rather than separate increments. Program officials reported ongoing staffing concerns that could impede program execution.

BASELINE AND CURRENT COST ESTIMATES dollars in millions



SELECTED MILESTONE DELAY in months



NON-INTRUSIVE INSPECTION INTEGRATION

Program History and Acquisition Strategy

The NII Integration program supports CBP's mission to safeguard U.S. borders from threats while facilitating legitimate international travel. The program began in December 2019 as an addition to the NII Systems program, which was initiated in the 1990s and estimated to cost over \$1.6 billion. The NII Systems program is a separate program that operates stand-alone scanning systems that lack integration with broader CBP networks. These two programs remain closely intertwined but program officials stated they are working to separate out program information so they can be managed separately.

Cost and Schedule Status

NII Integration does not have its own funding profile and instead uses funding budgeted for the NII Systems program. Program officials stated this includes PC&I funding for algorithm and integration efforts. Program officials also stated that they are updating cost estimates and the acquisition strategy for NII Integration, but are uncertain how funding will be appropriated for fiscal year 2025 and beyond. DHS's fiscal year 2025 budget request does not include PC&I funding for the NII programs. The estimated costs for the program are reduced due to delaying the purchase of equipment to fiscal year 2028 and beyond, which leads to fewer technology refresh cycles. Program officials stated that the program needs to further update its cost estimate as the current one was overtaken by events.

NII Integration delayed its ADE 2B milestone from March 2025 to March 2027. According to program officials, this delay stems from a need to reevaluate the program's scope, requirements, and acquisition strategy due to the decision to keep the NII Systems and NII Integration programs separate.

Performance and Testing

Program officials continue to address the scope of NII Integration and its requirements. NII Integration's September 2022 operational requirements document includes four KPPs. Two KPPs focus on transmission of data, one focuses on the rate of scans, and one focuses on cyber resiliency. The program has yet to conduct testing to determine if any KPPs have been met, nor has it scheduled operational testing. According to program officials, they plan to update the operational requirements document and establish a new concept of operations document in fiscal year 2025 to incorporate reevaluated requirements.

As we reported last year, DHS test and evaluation officials stated that they have concerns about the clarity of the program scope. One of the program's top risks is a lack of agreement on defining program success and the expectations of stakeholders not matching what is technically feasible. To address this concern, the program plans to develop a comprehensive communication plan to

clarify program capabilities. According to program officials, the stakeholders involved include CBP, DHS leadership, and lawmakers.

Program Management

According to program officials, DHS no longer plans to merge the legacy NII Systems and NII Integration programs, as we reported last year, and the two programs will remain separate. Program officials stated that CBP is in the process of delineating the two programs, but the shared funding sources and the uncertainty of future NII Integration funding complicate this effort. Ongoing government staffing challenges continue to impede the program's ability to execute requirements on schedule.

Program officials stated that CBP will no longer manage the program as separate land, sea, and air increments, as we previously reported. According to these officials, CBP is consolidating the program into a single increment to be more architecturally sound. They also noted that this will improve operational testing efficiency because the program will not need to retest the same technology across different environments. These officials stated that while the outward appearance may be different in the different environments, the actual systems in the background are the same.

NII Integration has identified existing CBP systems for reuse to deliver a common viewing platform. This platform will support the use of the Anomaly Detection Algorithm and artificial intelligence. NII Integration intends to use an Agile development methodology to evaluate, refine, and deploy the Anomaly Detection Algorithm. As part of these efforts, CBP officials stated they receive constant feedback from field liaisons on their existing rapid scan capability and work with operational and acquisition support officers to obtain and incorporate feedback.

Program Office Comments

We provided a draft of this assessment to the program office for review and comment. The program office provided technical comments, which we incorporated where appropriate.

Appendix II: Objectives, Scope, and Methodology

The objectives of this audit were designed to provide congressional committees insight into the Department of Homeland Security's (DHS) major acquisition programs. We assessed the extent to which selected DHS major acquisition programs are meeting their baseline cost, schedule, and performance goals. We also assessed the status of the DHS acquisition portfolio, including any cost and schedule risks. Finally, we reviewed how DHS acquisitions have improved over the last 10 years in response to GAO recommendations, and what opportunities remain for DHS to further improve.

To address these objectives, we selected 24 of DHS's 36 major acquisition programs.¹ We selected 16 of DHS's level 1 acquisition programs—those with life-cycle cost estimates of \$1 billion or more—that had at least one project, increment, or segment in the obtain phase at the initiation of our audit in January 2024. The obtain phase is the stage in the acquisition life cycle when programs develop, test, and evaluate systems. All 16 programs had at least one segment in the process of obtaining new capabilities at the initiation of this audit. Additionally, we reviewed eight other level 1 or level 2 major acquisition programs that we identified as at risk of not meeting their cost estimates, schedules, or capability requirements, based on our past work. We excluded the remaining 12 major acquisition programs for a variety of reasons, including lower risk programs already in deployment.

We met with representatives from DHS's Office of Program Accountability and Risk Management—DHS's main body for acquisition oversight—as a part of our scoping effort to determine which programs, if any, were facing difficulties in meeting their cost, schedules, or capability goals. The 24 selected programs were sponsored by six different components, and they are identified in table 6, along with our rationale for selecting them.

¹Our review included 23 of the 26 programs that we reviewed in GAO, *DHS Annual Assessment: Most Programs Are Meeting Current Goals, but Some Continue to Face Cost and Schedule Challenges*, [GAO-24-106573](#) (Washington, D.C.: Feb. 22, 2024).

**Appendix II: Objectives,
Scope, And Methodology**

Table 6: GAO Rationale for Selecting DHS Major Acquisition Programs for Review

Component	Program	Level 1 program in the obtain phase at the initiation of GAO's review	Level 1 or level 2 program identified to be at risk^a
Cybersecurity and Infrastructure Security Agency	Continuous Diagnostics and Mitigation	X	—
	Cyber Analytic and Data System	X	—
	Next Generation Network Priority Services Phase 1	—	X
	Next Generation Network Priority Services Phase 2	—	X
DHS Management Directorate	Homeland Advanced Recognition Technology	X	—
Federal Emergency Management Agency	Enterprise Data and Analytics Modernization Initiative	—	X
	Grants Management Modernization	—	X
	Integrated Public Alert and Warning System	—	X
Transportation Security Administration	Checkpoint Property Screening System	X	—
	Credential Authentication Technology	—	X
U.S. Coast Guard	Medium Range Recovery Helicopter (MH-60T) Sustainment Program	X	—
	Medium Range Surveillance Aircraft	X	—
	Offshore Patrol Cutter	X	—
	Polar Security Cutter	X	—
	Waterways Commerce Cutter	X	—
U.S. Customs and Border Protection	Automated Commercial Environment	X	—
	Biometric Entry-Exit	X	—
	Common Operating Picture	—	X
	Cross Border Tunnel Threat	X	—
	Integrated Surveillance Towers	—	X
	Light Enforcement Platform	X	—
	Medium Lift Helicopter	X	—

**Appendix II: Objectives,
Scope, And Methodology**

Component	Program	Level 1 program in the obtain phase at the initiation of GAO's review	Level 1 or level 2 program identified to be at risk ^a
	Multi-Role Enforcement Aircraft	X	—
	Non-Intrusive Inspection Integration	X	—

Legend: X = applicable rationale; — = not applicable

Source: GAO analysis of Department of Homeland Security (DHS) data. | GAO-25-107317

^aPrograms with Xs in this column are either level 2 programs in the obtain phase, or level 1 or level 2 programs that GAO identified as at risk of not meeting their cost estimates, schedules, or capability requirements based on its past work.

To determine the extent to which DHS's major acquisition programs are meeting their cost, schedule, and performance goals, we collected key acquisition documentation for each of the 24 programs, including life-cycle cost estimates and acquisition program baselines (APB). The current version of DHS's acquisition management policy establishes that all major acquisition programs should have a department-approved APB—which establishes a program's critical cost, schedule, and performance parameters—at acquisition decision event 2B. Seventeen of the 24 programs had at least one department-approved life-cycle cost estimate and APB between November 2008 and our cut-off date of September 30, 2024.² We excluded the seven programs without department-approved APBs, as none of these programs have progressed to the point of the acquisition life-cycle framework where an APB is required by policy, from our aggregated analyses reviewing the extent that programs are meeting their cost, schedule, and performance goals. Ultimately, we included 17 of the 24 programs in our portfolio analysis of programs meeting goals.

We used APBs to identify the initial and current cost and schedule goals for the programs. For all programs we reviewed, we converted cost information to fiscal year 2023 dollars using conversion factors from our Inflation Adjustment Calculator. This is a change from our nine prior annual assessments, where we presented cost information in then-year dollars. For the purposes of this review, we generally used the date that

²The remaining seven programs—Common Operating Picture, Cross Border Tunnel Threat, Cyber Analytic and Data System, Integrated Surveillance Towers, Light Enforcement Platform, Next Generation Network Priority Services Phase 2, and Non-Intrusive Inspection Integration—did not receive department approval of their initial APBs by September 30, 2024. Therefore, we excluded them from our assessment of whether programs are on track to meet their schedule and cost goals during fiscal year 2024.

DHS leadership signed the relevant acquisition decision memorandum to signify the date of an event, including acquisition decision events. We used a questionnaire to collect standardized information about cost, schedule, and performance activities.

To determine how many programs did not meet or adjusted their APBs, we reviewed breach, rebaseline, and APB adjustment memorandums, and conducted interviews. We reviewed additional program documentation to confirm that these programs received approval to adjust their APBs and to determine the cost and schedule effects of those adjustments.

To determine the extent to which programs are documenting the change drivers behind APB revisions in their revision summaries, we reviewed DHS Instruction 102-01-001 and DHS PARM's September 2021 APB guidance template and assessed the newest APB from five components in our scope revised after September 2021. One component in our scope was excluded, as none of its APBs had been revised after September 2021. We reviewed program documentation and requested information from program and headquarters officials.

We also met with program officials to identify the causes and effects associated with any identified schedule and cost goal changes. To determine the extent to which programs were meeting performance goals, we requested information from each individual program and DHS's test and evaluation officials. We used standardized questionnaires given to each acquisition program to obtain information about key performance parameters and whether those parameters were met or changed since our last review. We requested and received information from DHS's test and evaluation officials about programs that had completed testing of deployed capabilities and had key performance parameters that were generally met.

To determine the status of the DHS acquisition portfolio, including any cost and schedule risks for our selected programs, we reviewed program information and conducted interviews. To determine the total estimated program acquisition costs for the programs in our review, we analyzed life-cycle cost estimate data as of September 2024 and presented this information by component. Programs develop an estimated life-cycle cost before they have an approved initial APB. The programs in our scope excluded from this part of our analysis either lack an approved estimate or were excluded for other reasons. To determine the schedule milestones met and expected for next year we reviewed program

documentation such as APBs and acquisition decision memorandums, information from a standardized questionnaire given to each acquisition program, and interviews with program and component officials. To determine upcoming schedule and cost risks we reviewed information provided by program and component officials, as well as program and external documentation such as Congressional Budget Office estimates.

To determine how DHS acquisitions have improved over the past 10 years in response to GAO recommendations, we reviewed GAO reports, including prior DHS annual assessments, reports on DHS major acquisitions, and the High-Risk Series. From these reports, we identified public recommendations related to DHS acquisitions processes, such as cost and schedule practices, program performance, and test and evaluation. We also reviewed how DHS responded to select closed recommendations. To identify what opportunities remain to improve DHS acquisition management, we reviewed the current status of our recommendations from our internal recommendation tracking system. To identify recommendations related to DHS acquisitions, we filtered selected recommendations by a variety of keywords related to DHS acquisitions. Examples include topics such as cost, performance, and test and evaluation. After determining the recommendations, we grouped them according to implementation status (open or closed) as of December 31, 2024.

Subsequently, we drafted preliminary assessments for each program. When drafting these assessments, we used either a one- or two-page format based on the program's status. We used a one-page assessment format for those programs that have not yet achieved acquisition decision event 2B or if the program has achieved full operational capability. After drafting the assessments, we shared them with program and component officials and gave those officials an opportunity to submit comments to help us correct any inaccurate or outdated information, or clarify, as appropriate.

We conducted this performance audit from January 2024 to February 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.

Appendix III: Comments from Department of Homeland Security

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



**Homeland
Security**

BY ELECTRONIC SUBMISSION

January 14, 2025

Travis J. Masters
Director, Contracting and National Security Acquisitions
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548-0001

Re: Management Response to Draft Report GAO-25-107317, "DHS ANNUAL ASSESSMENT: Improved Guidance on Revised Acquisition Goals Would Enhance Transparency"

Dear Mr. Masters:

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

DHS leadership is pleased to note GAO's positive recognition that all but one of the 17 DHS major acquisition programs with DHS-approved baselines GAO analyzed in this engagement are meeting their current cost and schedule goals. GAO also highlighted that, over the last 10 years, DHS established policies and processes to improve acquisition program management, oversight, and test and evaluation. These policies are focused on promoting consistency in how DHS policy is applied across different Components, bolstering the application of acquisition policy through well-documented decision-making, and offering guidance to support various processes. DHS remains committed to enhancing acquisition oversight, implementing structured and effective acquisition management practices, and promoting transparency and accountability across its major acquisition programs that provide systems and capabilities that advance the Department's ability to achieve its mission and operations.

The draft report contained one recommendation for DHS with which the Department concurs. Enclosed find our detailed response to the recommendation. DHS previously

submitted technical comments addressing accuracy, contextual, and other issues under a separate cover for GAO's consideration, as appropriate.

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: 2025.01.14 16:34:48 -05'00'

JIM H. CRUMPACKER
Director
Departmental GAO-OIG Liaison Office

Enclosure

**Enclosure: Management Response to Recommendation
Contained in GAO 107317**

GAO recommended that the Secretary of Homeland Security ensure that the Director of the Office of Program Accountability and Risk Management (PARM):

Recommendation 1: Update its acquisition guidance to specify that Acquisition Program Baselines for DHS's major acquisition programs clearly document the context behind key program changes, such as revisions to cost and schedule parameters and the reasons for such revisions (e.g., breaches, COVID-related updates, administrative updates, or requirements changes).

Response: Concur. The DHS Management Directorate's PARM will review and update the "Acquisition Program Baseline [APB] Template & Directions," issued in 2021, to ensure that major acquisition programs clearly document the context behind key program changes in the APB. This will include making revisions to cost and schedule parameters and documenting the reasons for such revisions, as appropriate. Estimated Completion Date: May 30, 2025.

Appendix IV: Related Open DHS Recommendations

Table 7: Related Open DHS Recommendations as of December 31, 2024

GAO report title and number	Recommendation
<p><i>Aviation Security: TSA Should Ensure Screening Technologies Continue to Meet Detection Requirements after Deployment</i> GAO-20-56</p>	<p>The TSA Administrator should require and ensure that TSA officials document their assessments of risk and the rationale—including the assumptions, methodology, and uncertainty considered—behind decisions to deploy screening technologies. (Recommendation 3)</p>
<p><i>Agile Software Development: DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to Take Additional Action</i> GAO-20-213</p>	<p>The Secretary should ensure that the CIO, in collaboration with the Chief Procurement Officer, through the Homeland Security Acquisition Institute, establish Agile training requirements for senior stakeholders. (Recommendation 5)</p> <p>The Secretary should ensure that the CIO, in collaboration with the Chief Procurement Officer, through the Homeland Security Acquisition Institute, establish Agile training requirements for staff outside of the acquisition workforce but assigned to Agile programs. (Recommendation 7)</p>
<p><i>DHS Service Contracts: Increased Oversight Needed to Reduce the Risk Associated with Contractors Performing Certain Functions</i> GAO-20-417</p>	<p>The Secretary of Homeland Security should direct the DHS Chief Procurement Officer to, in coordination with the Office of Program Accountability and Risk Management, develop a risk-based approach for reviewing service requirements—through the Procurement Strategy Roadmap or other means—to ensure proposed service requirements are clearly defined and reviewed before planning how they are to be procured. (Recommendation 1)</p> <p>The Secretary of Homeland Security should direct the DHS Chief Procurement Officer to update the Inherently Governmental and Critical Functions Analysis to provide guidance for analyzing, documenting, and updating the federal workforce needed to perform or oversee service contracts requiring heightened management attention. (Recommendation 4)</p> <p>The Secretary of Homeland Security should direct the DHS Chief Financial Officer to work with Congress to identify information to include in its annual congressional budget justifications to provide greater transparency into requested and actual service requirement costs, particularly for those services requiring heightened management attention. (Recommendation 6)</p>
<p><i>Coast Guard Acquisitions: Opportunities Exist to Reduce Risk for the Offshore Patrol Cutter Program</i> GAO-21-9</p>	<p>The DHS Secretary should ensure the DHS Under Secretary for Management directs the Coast Guard to include in OPC’s acquisition program baseline for stage 2 OPC’s delivery dates when the stage 2 acquisition program baseline is established and approved at ADE 2B. (Recommendation 2)</p> <p>The Commandant of the Coast Guard should ensure the Coast Guard Component Acquisition Executive revises Coast Guard’s acquisition policy to include criteria and a methodology for demonstrating design maturity for shipbuilding programs that are aligned with shipbuilding best practices, including specifying the completion of basic and functional designs and maturing critical technologies to a TRL of 7. (Recommendation 4)</p> <p>The Commandant of the Coast Guard should ensure the OPC program updates its shipbuilder and government schedules for OPCs 1 through 4 to (1) fully address deficiencies identified in the shipbuilder’s schedule, and (2) fully incorporate schedule risk analysis in accordance with schedule best practices. (Recommendation 6)</p> <p>The DHS Secretary should ensure the DHS Under Secretary for Management directs the Coast Guard, as it develops the next life cycle cost estimate for the OPC program, to update its cost estimate for stage 1 in accordance with best practices for cost estimation, including: (1) conducting a sensitivity analysis, (2) conducting a risk and uncertainty analysis, (3) reflecting information from the program’s most recent technical baseline, and (4) conducting an independent cost assessment of the estimate. (Recommendation 7)</p>

**Appendix IV: Related Open
DHS Recommendations**

GAO report title and number	Recommendation
<p><i>TSA Acquisitions: TSA Needs to Establish Metrics and Evaluate Third Party Testing Outcomes for Screening Technologies</i> GAO-21-50</p>	<p>When performance metrics have been established, the Administrator of TSA should assess gains in efficiency resulting from third party testing. (Recommendation 2)</p> <p>The Administrator of TSA should assess whether third party testing contributes to its goals of increasing supplier diversity and innovation. (Recommendation 3)</p>
<p><i>Biodefense: DHS Exploring New Methods to Replace BioWatch and Could Benefit from Additional Guidance</i> GAO-21-292</p>	<p>The Secretary of Homeland Security should ensure the BD21 program office clarifies in its acquisition documentation before the ADE 2A decision point the intention of the situational awareness and common operating picture capability identified as a gap, including the specific functionality, sources of information, and distinction from existing common operating picture functions at DHS. (Recommendation 1)</p> <p>The Secretary of Homeland Security should ensure the BD21 program conducts high-quality TRAs of all critical technologies for BD21 before the ADE 2A decision and before the ADE 2B decision (including a TRA of the overall system level interaction with the anomaly detection algorithm), in accordance with GAO's TRA best practice guide. (Recommendation 3)</p>
<p><i>Homeland Security: DHS Needs to Fully Implement Key Practices in Acquiring Biometric Identity Management System</i> GAO-21-386</p>	<p>The Secretary of DHS should direct the OBIM Director to ensure that the HART program office fully reviews and approves or rejects contractor deliverables prior to working on the next system release. (Recommendation 4)</p> <p>The Secretary of DHS should direct the OBIM Director to ensure that the HART program defines the extent to which it should be interacting with each of its stakeholders throughout the acquisition process, and, once established, monitors stakeholder involvement against that defined level of involvement. (Recommendation 6)</p>
<p><i>Federal Contracting: Senior Leaders Should Use Leading Companies' Key Practices to Improve Performance</i> GAO-21-491</p>	<p>The Secretary of Homeland Security should ensure the DHS Chief Procurement Officer collaborates with end users to develop performance metrics for procurement organizations. (Recommendation 4)</p> <p>The Secretary of Homeland Security should ensure the DHS Chief Procurement Officer uses a balanced set of performance metrics to manage the department's procurement organizations, including outcome-oriented metrics to measure (a) cost savings/avoidance, (b) timeliness of deliveries, (c) quality of deliverables, and (d) end-user satisfaction. (Recommendation 9)</p>
<p><i>Customs and Border Protection: Actions Needed to Enhance Acquisition Management and Knowledge Sharing</i> GAO-23-105472</p>	<p>The CBP Commissioner should update acquisition guidance, such as the PLP Guide, to accurately reflect how key governance councils are conducting portfolio management. (Recommendation 1)</p> <p>The CBP Commissioner should ensure that the Component Acquisition Executive updates guidance to require that contracting officers be included in the development of information summarized in DHS's Acquisition Strategy Document, to ensure contracting officers have knowledge of and are involved in developing program-level acquisition strategies. (Recommendation 2)</p> <p>The CBP Commissioner should ensure that the CBP Component Acquisition Executive updates acquisition guidance to require CBP to collect, analyze, and validate acquisition programs' lessons learned throughout the acquisition life cycle. (Recommendation 3)</p> <p>The CBP Commissioner should ensure that the CBP Component Acquisition Executive develops a central repository for acquisition programs to archive and share lessons learned. (Recommendation 4)</p>
<p><i>Coast Guard Acquisitions: Offshore Patrol Cutter Program Needs to Mature Technology and Design</i> GAO-23-105805</p>	<p>The Commandant of the Coast Guard should ensure that OPC program officials develop a technology maturation plan for the davit prior to builder's trials. This plan should identify potential courses of action to address davit technical immaturity, including assessing technology alternatives should the current davit continue to face development challenges, and a date by which the Coast Guard will make a go/no-go decision to pursue such a technology alternative. (Recommendation 1)</p>

**Appendix IV: Related Open
DHS Recommendations**

GAO report title and number	Recommendation
<p><i>Coast Guard Acquisitions: Polar Security Cutter Needs to Stabilize Design Before Starting Construction and Improve Schedule Oversight</i> GAO-23-105949</p>	<p>The Commandant of the Coast Guard should ensure that OPC program officials test an integrated prototype of the davit in a realistic environment prior to stage 1 builder's trials. (Recommendation 2)</p>
	<p>The Commandant of the Coast Guard should ensure that the OPC stage 2 program achieves a sufficiently stable design prior to the start of lead ship construction. In line with shipbuilding leading practices, sufficiently stable design includes 100 percent completion of basic and functional design, including routing of major distributive systems and transitive components that effect multiple zones of the ship. (Recommendation 5)</p>
<p><i>Biometric Identity System: DHS Needs to Address Significant Shortcoming in Program Management and Privacy</i> GAO-23-105959</p>	<p>The DHS Secretary should ensure the DHS Under Secretary for Management ensures design for the lead PSC is mature, meaning at least the functional design is complete, including routing of major distributive systems that affect multiple zones of the ship, prior to authorizing lead cutter construction beyond the previously approved eight prototype units. (Recommendation 1)</p>
	<p>The DHS Secretary should ensure the DHS Under Secretary for Management ensures the Coast Guard adds the delivery date for the third PSC to the acquisition program baseline as soon as practical. (Recommendation 2)</p>
	<p>The Secretary of DHS should direct the OBIM Director to update the cost estimate for the HART program to account for all costs and incorporate the best practices called for in the GAO Cost Estimating and Assessment Guide. (Recommendation 1)</p>
	<p>The Secretary of DHS should direct the OBIM Director to revise the schedule estimate for the HART program that incorporates the best practices called for in the GAO Schedule Assessment Guide. (Recommendation 2)</p>
	<p>The Secretary of DHS should direct the OBIM Director to coordinate with the Privacy Office to establish and implement a timeline for updating the HART PIA to fully describe the categories of individuals whose data will be stored in HART and the partners with whom the system shares information. (Recommendation 3)</p>
	<p>The Secretary of DHS should direct the Privacy Office to describe planned methodologies for determining that all privacy controls are implemented correctly and operating as intended for future control assessments of the HART program. (Recommendation 4)</p>
	<p>The Secretary of DHS should direct the Privacy Office to develop a timeline for completing the planned HART privacy compliance review. (Recommendation 5)</p>
	<p>The Secretary of DHS should direct the OBIM Director to coordinate with the Privacy Office to establish and implement plans for correcting seven remaining privacy deficiencies identified in the HART PIA. (Recommendation 6)</p>
	<p>The Secretary of DHS should direct the Privacy Office to ensure the complete HART authorization package is reviewed by the office prior to future system authorizations. (Recommendation 7)</p>
<p>The Secretary of DHS should direct the OBIM Director to establish and implement a timeline for maintaining a reliable inventory of information sharing and access agreements with partners that share data with HART. (Recommendation 8)</p>	
<p>The Secretary of DHS should direct the OBIM Director to establish and maintain a process for ensuring that partners that provide data to HART have used the system's services to help to appropriately dispose of PII from the system, in accordance with applicable records retention schedules. (Recommendation 9)</p>	
<p><i>DHS Acquisitions: Opportunities Exist to Enhance Risk Management</i> GAO-23-106249</p>	<p>The Secretary of Homeland Security should ensure that the Office of Program Accountability and Risk Management (1) assesses the costs and benefits of developing or acquiring the capability to systematically share risk management knowledge, such as data in risk registers and risk management approaches, across the department, and (2) determines whether to implement such a capability. (Recommendation 4)</p>

**Appendix IV: Related Open
DHS Recommendations**

GAO report title and number	Recommendation
<p><i>DHS Annual Assessment: Major Acquisition Programs Are Generally Meeting Goals, but Cybersecurity Policy Needs Clarification</i> GAO-23-106701</p>	<p>The Secretary of Homeland Security should ensure that, as the department updates its Instruction 102-01-012, it clarifies (1) which major acquisition programs are required to have completed cybersecurity risk recommendation memorandums prior to acquisition decision events, and (2) when exemptions apply.</p>
<p><i>Coast Guard: Aircraft Fleet and Aviation Workforce Assessments Needed</i> GAO-24-106374</p>	<p>The Commandant of the Coast Guard should assess the type of helicopters the Coast Guard requires to meet its mission demands, as part of an analysis of alternatives. (Recommendation 3)</p> <p>The Commandant of the Coast Guard should assess the number of helicopters the Coast Guard requires to meet its mission demands, as part of a fleet mix analysis. (Recommendation 4)</p> <p>The Commandant of the Coast Guard should assess and determine the aviation workforce levels it requires to meet its mission needs. (Recommendation 5)</p>
<p><i>Homeland Security: Actions Needed to Address Acquisition Workforce Challenges and Data</i> GAO-25-107075</p>	<p>The Secretary of Homeland Security should ensure that the Under Secretary for Management develops a strategy to implement steps to assess whether its mitigation efforts are aligned with the challenges facing the acquisition workforce and monitor results, such as establishing and tracking performance metrics for the efforts it is using to address workforce challenges. (Recommendation 1)</p> <p>The Secretary of Homeland Security should ensure that as the Program Accountability and Risk Management office continues to refine its staffing model, that it continues to identify and implement greater process efficiencies in its data collection efforts on the workforce supporting major acquisition programs, and works with components to identify what, if any, additional data and resources are needed to meet the model's original goals, including justifying staffing needs and generating appropriate staff compositions for current and future programs. (Recommendation 2)</p> <p>The Secretary of Homeland Security should ensure that the Under Secretary for Management establishes a methodology for identifying information about the personnel supporting the 11 DHS-defined acquisition disciplines that make up DHS's acquisition workforce. (Recommendation 3)</p> <p>The Secretary of Homeland Security should ensure that the Office of the Chief Procurement Officer identifies methods to ensure it maintains comprehensive data across all 11 disciplines that constitute the acquisition workforce, such as identifying additional acquisition workforce data from the components or requiring acquisition personnel to regularly update their records in Cornerstone. (Recommendation 4)</p>
<p><i>Coast Guard Acquisitions: Further Cost and Affordability Analysis of Polar Fleet Needed.</i> GAO-25-106822</p>	<p>The Commandant of the Coast Guard should ensure the Coast Guard develops a detailed cost estimate before purchasing a commercially available polar icebreaker that incorporates the costs of modifications to reach full operational capability. (Recommendation 1)</p> <p>The Commandant of the Coast Guard should complete an analysis of the cost and sequencing for the polar icebreaker fleet expansion, including how these efforts are affordable within its larger acquisition portfolio. (Recommendation 2)</p>

Source: GAO. | GAO-25-107317

Note: ADE = Acquisition Decision Event; BD21 = Biological Detection for the 21st Century; CIO = Chief Information Officer; CBP = U.S. Customs and Border Protection; HART = Homeland Advanced Recognition Technology; OBIM = Office of Biometric Identity Management; OPC = Offshore Patrol Cutter; PIA = Privacy Impact Assessment; PLP = Program Lifecycle Process; PSC = Polar Security Cutter; TRA = Technology Readiness Assessment; TRL = Technology Readiness Level; TSA = Transportation Security Administration

Appendix V: GAO Contact and Staff Acknowledgments

GAO Contact

Travis J. Masters at (202) 512-4841 or masterst@gao.gov

Staff Acknowledgments

In addition to the contact listed above, Claire Li (Assistant Director), Ryan Braun (Portfolio Analysis Analyst-in-Charge), Megan Stewart (Program Assessments Analyst-in-Charge), Shelby Clark, James Cora, and Christian Perez made key contributions to this report. Other contributors included Macie Benincasa, Hannah Bisbing, Patrick Breiding, Erin Carr, John W. Crawford, Jennifer Dougherty, Aryn Ehlow, Lorraine Ettaro, Marcus Ferguson, Katheryn Hubbell, Jessica Karnis, Min-Hei (Michelle) Kim, Riley Knight, TyAnn Lee, Brittany Morey, Scott Purdy, Ashley Rawson, William Reed, Alyssa Weir, Miranda Wickham, Alexandra Wilk, Robin Wilson, and Jacob Wu.

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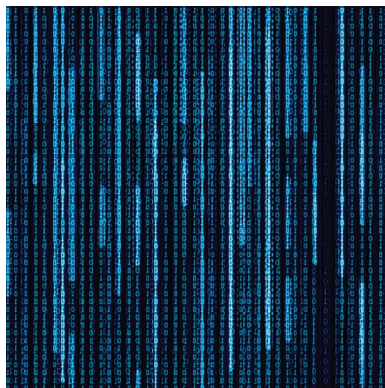
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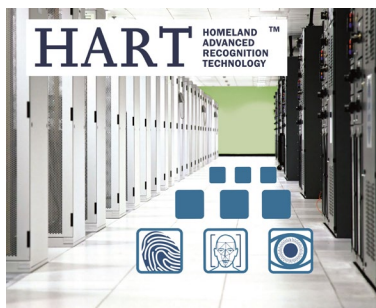


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Related GAO Products

Coast Guard Acquisitions: Further Cost and Affordability Analysis of Polar Fleet Needed. [GAO-25-106822](#). Washington, D.C.: December 19, 2024.

Homeland Security: Actions Needed to Address Acquisition Workforce Challenges and Data. [GAO-25-107075](#). Washington, D.C.: December 12, 2024.

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