



Accessible Version,

April 19, 2019

The Honorable Kevin K. McAleenan

Acting Secretary of Homeland Security

Washington, D.C. 20528

**Priority Open Recommendations: Department of Homeland Security**

Dear Mr. Secretary:

The purpose of this letter is to provide an update on the overall status of the Department of Homeland Security's (DHS) implementation of GAO's recommendations and to call your personal attention to areas where open recommendations should be given high priority.<sup>1</sup> In November 2018, we reported that on a government-wide basis, 77 percent of our recommendations made 4 years ago were implemented.<sup>2</sup> DHS's recommendation implementation rate was 84 percent. As of January 2019, DHS had 427 open recommendations. Fully implementing these open recommendations could significantly improve DHS's operations.

Since our April 2018 letter, DHS has implemented four of 19 open priority recommendations. Two of these recommendations are related to border security and immigration. Implementing these recommendations has resulted in some improvement to (1) the U.S. Citizenship and Immigration Services' (USCIS) ability to detect fraud patterns across asylum applications and (2) the U.S. Border Patrol's efforts to address tactical infrastructure requirements. The Transportation Security Administration (TSA) has also limited funding for its Behavior Detection Program, consistent with our recommendation that it does so until it provides valid evidence that demonstrates that behavioral indicators can be used to identify passengers who may pose a threat to aviation security. DHS implemented the fourth recommendation by designating its headquarters consolidation program as a major acquisition, which resulted in greater departmental oversight of the program.

DHS has 15 priority recommendations remaining from those we identified in our April 2018 letter. We ask your continued attention on these remaining recommendations. We are adding 11 new recommendations as priorities this year related to Federal Emergency Management Agency (FEMA) flood insurance, southwest border barriers, Coast Guard electronic health records and station closures, cybersecurity, and chemical and nuclear security, bringing the total number of priority recommendations to 26. (See the enclosure for the list of these recommendations.)

The 26 priority recommendations fall into the six major areas listed below.

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

<sup>2</sup>GAO, *Performance and Accountability Report: Fiscal Year 2018*, [GAO-19-1SP](#) (Washington, D.C.: November 15, 2018).

## **Emergency Preparedness and Response.**

We have five priority recommendations in this area. The National Flood Insurance Program (NFIP) has been on our high-risk list since 2006, and while we have emphasized the need for Congress to enact comprehensive reform of the program, we have also identified three actions that FEMA could take to improve its administration of it.

- In October 2008, we recommended that FEMA take steps to ensure that its rate-setting methods and data result in premium rates that accurately reflect the full risk of losses from flooding. In November 2018, FEMA officials told us they had begun to redesign NFIP's risk rating system. They expect to begin implementing the new rates in 2020, noting that it would take several more years to implement the new rates for all policyholders.
- In August 2009, we recommended that FEMA annually analyze the amounts of actual expenses and profit in relation to the estimated amounts used in setting payment rates for Write-Your-Own (WYO) companies. FEMA officials said that it was responding to this recommendation as part of its development of a final rule on WYO compensation practices, which it has not yet completed. An annual analysis of WYO insurers' actual expenses and profit would provide greater transparency and accountability over existing payments to the WYOs before a new rule is finalized.
- In July 2013, we recommended that FEMA develop and implement a plan, including a timeline, to obtain elevation information for all of its policies, especially subsidized policies, as soon as practicable. As part of the redesign of its risk rating system, FEMA will obtain multiple sources of data and information about a property's risk of flooding—from which it may be able to derive elevation information on some properties—to develop the insurance rate. FEMA expects to begin implementing new rates in one region of the country in 2020, and it will determine the schedule of implementation in other regions at a future date.
- In September 2012, we recommended that FEMA develop a methodology to better assess a jurisdiction's capability to respond to and recover from a disaster without federal assistance. However, FEMA has considered changing its methodology, but has yet to identify a new methodology and does not have an estimated completion date for implementation. Until FEMA implements a new methodology, the Administrator of FEMA runs the risk of recommending that the President award Public Assistance to jurisdictions that have the capability to respond and recover from a disaster without federal assistance.
- In July 2015, we recommended that the national Mitigation Framework Leadership Group (MitFLG) establish an investment strategy to identify, prioritize, and guide federal investments in disaster resilience and hazard mitigation-related activities. In January 2018, FEMA made a draft strategy available for a public comment period that extended through March 11, 2018, and expects the final strategy to be completed during 2019.

## **Border Security.**

We have seven priority recommendations in this area.

- In March 2014, we recommended that U.S. Customs and Border Protection (CBP) analyze data to determine the contribution of surveillance technologies to CBP's border security efforts. Border Patrol has taken steps to address this recommendation, and has begun using data to evaluate the contributions of technologies. However, to fully implement this recommendation, CBP needs to fully develop and apply key attributes for performance metrics for all technologies deployed under the Arizona Border Surveillance Technology Plan; continue using the data to evaluate the individual and collective contributions of

specific technologies; and fully assess its progress in implementing the Plan and determining when mission benefits have been fully realized.

- We have one remaining recommendation designated as priority from our December 2015 report on asylum fraud that could strengthen USCIS efforts to assess and address fraud risks within the asylum process. USCIS drafted a fraud risk assessment in September 2017. However, Asylum Division officials identified limitations in the data used in the assessment and USCIS is working to complete a qualitative risk assessment by the end of May 2019, which we will assess to determine if it fully addresses our recommendation.
- In February 2017, we made a recommendation to DHS to develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border. Developing metrics to assess the contributions of fencing to border security operations could better position DHS to make resource allocation decisions with the best information available to inform competing mission priorities and investments. As of October 2018, DHS planned to test metrics and implement them in a concept of operations by September 2019.
- In July 2016, we made three recommendations to CBP to make improvements in areas such as risk management in the collection of antidumping and countervailing (AD/CV) duties. CBP has taken steps to address these recommendations, but additional steps are needed to minimize duty processing errors, complete its development of a risk assessment model, and use that model to mitigate the risk of AD/CV duty nonpayment. Although CBP expected to complete and test the model by October 2018, it encountered delays. As of January 2019, CBP officials did not provide an expected date for completion of the model. We will continue to monitor CBP's efforts to complete and test the risk assessment model.
- In July 2018, we recommended that CBP analyze the costs associated with future barrier segments along the southwest border and include cost as a factor in the Impedance and Denial Prioritization Strategy. As of October 2018, Border Patrol plans to complete revisions to the prioritization process by September 2019. We will follow-up with CBP to review these actions when completed.

### **Transportation Security.**

We have one priority recommendation in this area.

- In May 2011, we recommended that DHS, through TSA and the U.S. Coast Guard's combined efforts, conduct an assessment of the Transportation Worker Identification Credential Program's effectiveness. This assessment would determine whether the benefits of continuing to implement and operate the program in its present form and planned use with readers surpass the costs. Until these assessments are completed, TSA and Coast Guard will continue to fund activities that have not been determined to be effective.

### **Infrastructure and Management.**

We have five priority recommendations in this area.

- In September 2014, to improve transparency and support more informed decision making by congressional leaders and other decision-makers regarding the department's headquarters consolidation plans, we recommended that DHS and the General Services Administration (GSA) conduct a comprehensive needs assessment and gap analysis of current and needed capabilities. We recommended that this assessment should take into consideration changing conditions and an alternatives analysis that identifies the costs and benefits of

leasing and construction alternatives for the remainder of the project and prioritizes options to account for funding instability.

- We also recommended that DHS and GSA develop revised cost and schedule estimates for the remaining portions of the consolidation project. These estimates should conform to GSA guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.
- To address these two recommendations, the department and other stakeholders have made revisions to the DHS headquarters consolidation plan, and DHS is required to submit a current plan to Congress. However, the timeframe for DHS submitting this information is not clear because the plan is undergoing additional revisions and review. Given the magnitude of the headquarters consolidation project—in terms of its multi-billion dollar cost and its profound impact on future departmental operations—it will be important for the updated plan to include a robust analysis of current and future needed capabilities, among other things.
- In October 2017, we recommended that the Coast Guard establish a plan with target dates and milestones for closing boat stations that it has determined provide overlapping search and rescue coverage and are unnecessarily duplicative. We also recommended that the Coast Guard take action to close the stations identified according to its plan and target dates. The Coast Guard continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. As of December 2018, the Coast Guard has not closed any stations.
- In January 2018, we recommended that Coast Guard expeditiously and judiciously pursue the acquisition of a new electronic health records (EHR) system. DHS stated that the Coast Guard is pursuing an electronic health record solution. According to the Coast Guard, the progress of its electronic health records program has been accelerated due to the increased involvement of, and support from the Coast Guard, DHS, and Department of Defense senior leadership, and officials estimated that the new EHR system would be fully operational by the first quarter of fiscal year 2024. The implementation of such a system can significantly improve the health care quality and efficiency of thousands of Coast Guard active duty and reserve members.

## **Cybersecurity.**

We have five priority recommendations in this area.

- In February 2017, we recommended that DHS establish metrics for assessing the National Cybersecurity and Communications Integration Center’s adherence to applicable principles in carrying out statutorily-required cybersecurity functions. In addition, we recommended that DHS establish methods for monitoring the implementation of cybersecurity functions against the principles on an ongoing basis. The department has since taken action, but needs to complete several actions that are intended to address these recommendations. For example, DHS stated that it continues to determine the applicability of key performance indicators and performance targets.
- In February 2018, we recommended that DHS ensure that the Office of the Chief Human Capital Officer collects complete and accurate data on all filled and vacant cybersecurity positions from the department’s components when the office conducts its cybersecurity identification and coding efforts. In addition, we recommended that DHS develop guidance to assist the components in identifying their cybersecurity work categories and specialty areas of critical need that align to the National Initiative for Cybersecurity Education Framework. By developing such guidance, DHS would help components accurately

categorize certain skill gaps that align to more than one specialty area to avoid over-counting critical needs. Although DHS has taken some steps towards addressing the recommendations, it has not yet provided sufficient evidence that it has fully implemented the recommendations.

- To facilitate adoption of the National Institute of Standards and Technology's (NIST) Framework for Improving Critical Infrastructure Cybersecurity, in February 2018, we recommended that DHS take steps to consult with respective sector partners, such as the sector coordinating councils, and NIST, as appropriate, to develop methods for determining the level and type of adoption of the Framework by entities across their respective sectors. DHS has continued to promote the Framework and gather feedback on Framework use among critical infrastructure stakeholders.
- Specifically, DHS has hosted outreach and awareness engagements, including webinars, road shows, conferences, briefings, and regular working group meetings, to help organizations understand and use the Framework. Further, DHS has taken steps to determine usage amongst members of the Information Technology Sector. For example, DHS is collaborating with the Information Technology Sector Coordinating Council Small and Midsize Business (SMB) Working Group in a coordinated effort to evaluate Framework use and promote continued adoption within the broader Information Technology SMB community. However, DHS has yet to provide evidence regarding efforts to coordinate with the nine other sectors, such as the Communications and Transportation Systems sectors, for which it serves as the sector lead. DHS needs to address Framework adoption in these other sectors.

## **Chemical and Nuclear Security.**

We have three priority recommendations in this area.

- In August 2018, we recommended the Assistant Secretary for DHS's Countering Weapons of Mass Destruction Office develop a strategy and implementation plan to help DHS guide, support, integrate, and coordinate chemical defense programs and activities. DHS estimated that it will complete this effort by September 2019.
- In January 2018, we recommended that DHS develop a monitoring system to help ensure that U.S. Customs and Border Protection officials comply with license verification policies and procedures for imported radiological material.
- We also recommended that DHS and CBP develop a system that better identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments. The agency agreed with these recommendations and is taking steps to address the issues, with implementation expected by September 30, 2019.

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As you know, in March, we issued our biennial update to our high-risk program, which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.<sup>3</sup> Our high-risk program has served to identify and help resolve serious weaknesses in areas that involve substantial resources and provide critical service to the public.

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<sup>3</sup>GAO, *High-Risk Series: Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas*, [GAO-19-157SP](#) (Washington, D.C.: March 6, 2019).

One of our high-risk areas, Strengthening DHS Management Functions, centers directly on DHS.<sup>4</sup> Another high-risk area is related to FEMA's management of the National Flood Insurance Program.<sup>5</sup> Several other government-wide, high-risk areas including (1) ensuring cybersecurity of the nation, (2) improving management of IT acquisitions and operations, (3) strategic human capital management, (4) managing federal real property, and (5) government-wide security clearance process, also have direct implications for DHS and its operation. We urge your attention to the DHS and government-wide high-risk issues as they relate to DHS. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, the Office of Management and Budget, and the leadership and staff in agencies, including within DHS.

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees including the Committees on Appropriations, Budget, and Homeland Security and Governmental Affairs, United States Senate; and the Committees on Appropriations, Budget, and Oversight and Reform, House of Representatives. In addition, the report will be available at no charge on the GAO website at <http://www.gao.gov>.

I appreciate DHS's continued commitment to these important issues. If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Charles Michael Johnson, Jr., Managing Director, Homeland Security and Justice Team at [JohnsonCM@gao.gov](mailto:JohnsonCM@gao.gov) or (202) 512-8777. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Our teams will continue to coordinate with your staff on all of the 427 open recommendations. Thank you for your attention to these matters.

Sincerely yours,



Gene L. Dodaro  
Comptroller General  
of the United States

Enclosure

cc: David P. Pekoske, Senior Official Performing the Duties of the Deputy Secretary

Chip Fulgham, Acting Under Secretary for Management

Peter T. Gaynor, Acting Administrator, Federal Emergency Management Agency

John P. Sanders, Senior Official Performing the Duties of Commissioner, U.S. Customs and Border Protection

L. Francis Cissna, Director, U.S. Citizenship and Immigration Services

Carla L. Provost, Chief, United States Border Patrol

Patricia F.S. Cogswell, Acting Administrator, Transportation Security Administration

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<sup>4</sup>For a full discussion of this high-risk area, see pages 185 to 189 of the March 2019 high-risk update.

<sup>5</sup>For a full discussion of this high-risk area, see pages 272 to 274 of the March 2019 high-risk update.

Admiral Karl L. Schultz, Commandant of the Coast Guard, U.S. Coast Guard  
Christopher C. Krebs, Director, Cybersecurity and Infrastructure Security Agency  
Angela S. Bailey, Chief Human Capital Officer, Office of the Chief Human Capital Officer  
James F. McDonnell, Assistant Secretary, Countering Weapons of Mass Destruction Office

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

## Emergency Preparedness and Response

***Flood Insurance: FEMA's Rate-Setting Process Warrants Attention. GAO-09-12. Washington, D.C.: October 31, 2008.***

### Recommendation:

The Secretary of DHS should direct the Federal Emergency Management Agency (FEMA) to take steps to ensure that its rate-setting methods and the data it uses to set rates result in full-risk premium rates that accurately reflect the risk of losses from flooding. These steps should include, for example, verifying the accuracy of flood probabilities, damage estimates, and flood maps; ensuring that the effects of long-term planned and ongoing development, as well as climate change, are reflected in the flood probabilities used; and reevaluating the practice of aggregating risks across zones.

### Action Needed:

FEMA generally concurred with this recommendation, but expressed two reservations. First, FEMA suggested that the report did not fully recognize the difficulties of setting flood insurance rates, including the challenge of potentially catastrophic losses in any given year. However, we found a number of areas that raise questions about the accuracy of the National Flood Insurance Program (NFIP) rates and highlighted additional areas for analysis by FEMA. Second, FEMA said that the report did not accurately present the status of its map modernization efforts and their impact on premium rates. With respect to the status of map modernization, we noted that FEMA used a different form of measuring progress from the method we used and that we added FEMA's data to provide an additional perspective. FEMA also said that we overstated the impact of older maps on rate setting and that in many areas the flood hazard has not changed or may be decreasing. However, FEMA provided no analysis to support its contention that older maps are not always outdated. We also noted that up-to-date maps support a flood insurance program that is more aligned with actual risk.

FEMA officials said that they are redesigning the NFIP's risk-rating system. New rates will be rolled out to groups of policyholders incrementally, and FEMA expects the new rates to be available in mid-2019 with implementation for policy holders starting in 2020. Officials added that it will take several more years after that to implement the new rates for all policyholders. To fully implement the recommendation, FEMA will need to complete the redesign of its risk rating system, ensuring that it produces premium rates that accurately reflect the full risk of loss of the underlying property.

## High Risk Area: National Flood Insurance Program

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

**Contact information:** [CackleyA@gao.gov](mailto:CackleyA@gao.gov), (202) 512-8678



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

Recommendation:

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

Action Needed:

FEMA initially did not concur with this recommendation. To fully implement it, FEMA will need to develop and implement a process to annually analyze WYO expense and profit data and compare it to the rates it uses to compensate WYOs.

**High Risk Area: National Flood Insurance Program**

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

**Contact information:** [CackleyA@gao.gov](mailto:CackleyA@gao.gov), (202) 512-8678

***Flood Insurance: More Information Needed on Subsidized Properties. GAO-13-607. Washington, D.C.: July 3, 2013.***

Recommendation:

To establish full-risk rates for properties with previously subsidized rates that reflect their risk for flooding, the Secretary of DHS should direct the FEMA Administrator to develop and implement a plan, including a timeline, to obtain needed elevation information as soon as practicable.

Action Needed:

FEMA agreed with this recommendation. FEMA expects to begin gathering elevation information as part of its new rating methodology that it plans to implement starting in 2020. To fully implement this recommendation, FEMA will need to ensure that it is able to produce elevation data for all currently subsidized properties.

**High Risk Area: National Flood Insurance Program**

**Director:** Alicia Puente Cackley, Financial Markets and Community Investment

**Contact information:** [CackleyA@gao.gov](mailto:CackleyA@gao.gov), (202) 512-8678

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

Recommendation:

To increase the efficiency and effectiveness of the process for disaster declarations, the FEMA Administrator should develop and implement a methodology that provides a more

comprehensive assessment of a jurisdiction's capability to respond to and recover from a disaster without federal assistance. This should include one or more measures of a jurisdiction's fiscal capacity, such as Total Taxable Resources, and consideration of the jurisdiction's response and recovery capabilities. If FEMA continues to use the Public Assistance per capita indicator to assist in identifying a jurisdiction's capabilities to respond to and recover from a disaster, it should adjust the indicator to accurately reflect the annual changes in the U.S. economy since 1986, when the current indicator was first adopted for use. In addition, implementing the adjustment by raising the indicator in steps over several years would give jurisdictions more time to plan for and adjust to the change.

Action Needed:

FEMA agreed with this recommendation. To fully implement it, FEMA will need to develop and implement a methodology to better assess a jurisdiction's capability to respond to and recover from a disaster without federal assistance.

**Director:** Christopher P. Currie, Homeland Security and Justice

**Contact information:** [CurrieC@gao.gov](mailto:CurrieC@gao.gov), (202) 512-8777

**Hurricane Sandy: An Investment Strategy Could Help the Federal Government Enhance National Resilience for Future Disasters. [GAO-15-515](#). Washington, D.C.: July 30, 2015.**

Recommendation:

To help the federal, state, and local governments plan for and invest in hazard mitigation opportunities to enhance resilience against future disasters, the Director of the Mitigation Framework Leadership Group (MitFLG), in coordination with other departments and agencies that are MitFLG members, should supplement the National Mitigation Framework by establishing an investment strategy to identify, prioritize, and guide federal investments in disaster resilience and hazard mitigation-related activities and make recommendations to the President and Congress on how the nation should prioritize future disaster resilience investments. Such a strategy could address, among other things, (1) the extent to which current hazard mitigation and disaster resilience programs are adequately addressing critical lifelines and critical infrastructure, (2) an approach to identifying information on what disaster resilience and hazard mitigation efforts are most effective against known risks and their potential impacts on the nation's fiscal exposure, (3) the balance of federal and nonfederal investments, and (4) the balance of pre- and post-disaster resilience investments.

Action Needed:

DHS agreed with the recommendation. MitFLG released a draft National Mitigation Investment Strategy (NMIS) in January 2018 and collected public comments through March 11, 2018. In August 2018, FEMA officials responsible for coordinating interagency work on the NMIS told us that to better align NMIS with the 2018 FEMA Strategic Plan, the NMIS working group was revising the draft goals. Officials now expect a final version of NMIS to be completed during 2019.

To fully implement this recommendation, MitFLG will need to finalize the investment strategy to guide federal investments in disaster resilience and hazard mitigation-related activities to help prioritize future disaster resilience.

**Director:** Christopher P. Currie, Homeland Security and Justice

**Contact information:** [CurrieC@gao.gov](mailto:CurrieC@gao.gov), (202) 512-8777

## **Border Security**

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

### **Recommendation:**

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

### **Action Needed:**

CBP agreed with our recommendation. To fully implement it, CBP should complete its efforts to fully develop and apply key attributes for performance metrics for all technologies deployed under the Plan; continue using the data to evaluate the individual and collective contributions of specific technologies; and fully assess its progress in implementing the Plan and determining when mission benefits have been fully realized. In July 2018 Border Patrol distributed one report to its leadership with performance data for certain border security technologies. However, Border Patrol officials stated that some of the data in the report would not be reliable until the first quarter of fiscal year 2020 due to data entry errors in one of Border Patrol's data systems. Further, in December 2018, Border Patrol officials stated they had not prepared the report for the fourth quarter of fiscal year 2018, due to organizational changes and staffing challenges.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

**Asylum: Additional Actions Needed to Assess and Address Fraud Risks. [GAO-16-50](#). Washington, D.C.: December 2, 2015.**

### **Recommendation:**

To provide reasonable assurance that the U.S. Citizenship and Immigration Services' (USCIS) fraud prevention controls are adequate and effectively implemented, and ensure that asylum officers and Fraud Detection and National Security Directorate immigration officers have the capacity to detect and prevent fraud, the Secretary of Homeland Security should direct USCIS to conduct regular fraud risk assessments across the affirmative asylum application process.

### **Action Needed:**

USCIS agreed with this recommendation. To fully implement it, USCIS should regularly assess fraud risks across the affirmative asylum process to provide USCIS more complete information on risks that may affect the integrity of the process and help USCIS target its fraud prevention

efforts to those areas that are of highest risk. USCIS drafted a fraud risk assessment in September 2017, but Asylum Division officials identified limitations in the data used in the assessment. As of January 2019, USCIS is working to complete a qualitative risk assessment by the end of May 2019 for our review.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

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

Recommendation:

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

Action Needed:

DHS agreed with this recommendation and stated that it planned to develop metrics in its operational control framework for border security operations. To fully implement it, the Border Patrol should complete its efforts to develop metrics for assessing the contributions of pedestrian and vehicle fencing to border security operations and apply these metrics when making resource allocation decisions. As of October 2018, DHS planned to test metrics and implement them in a concept of operations by September 2019.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

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

Recommendation:

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

Action Needed:

CBP agreed with this recommendation. In August 2018, CBP updated and implemented the handbook used by staff to manage AD/CV duty liquidations. To fully address this recommendation, CBP needs to track and report progress toward reducing untimely liquidations

and their impact on revenue. As of January 2019, CBP officials did not provide an expected completion date.

Recommendation:

To improve risk management in the collection of AD/CV duties and to identify new or changing risks, CBP should regularly conduct a comprehensive risk analysis that assesses both the likelihood and the significance of risk factors related to AD/CV duty collection. For example, CBP could construct statistical models that explore the associations between potential risk factors and both the probability of nonpayment and the size of nonpayment when it occurs.

Action Needed:

CBP agreed with this recommendation. As of June 2018, CBP had developed a risk assessment model. While CBP expected to complete and test the model by October 2018, it encountered delays due to the complexity of the project. As of January 2019, CBP officials did not provide an expected completion date.

Recommendation:

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

Action Needed:

CBP agreed with this recommendation. To fully address it, CBP needs to complete its development of a risk assessment model that will use predictive risk analysis to identify entries that pose a heightened risk of AD/CV duty nonpayment. Once the model is completed, CBP can begin to take actions to mitigate risk of nonpayment. As of January 2019, CBP officials did not provide an expected completion date.

**Director:** Kimberly M. Gianopoulos, International Affairs and Trade

**Contact information:** [GianopoulosK@gao.gov](mailto:GianopoulosK@gao.gov), (202) 512-8612

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

Recommendation:

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

Action Needed:

CBP agreed with this recommendation. To fully address it, Border Patrol needs to analyze the costs associated with future barrier segments and incorporate that analysis into its process for prioritizing new barrier segments across the southwest border. As of October 2018, Border Patrol plans to complete revisions to the prioritization process by September 2019.

**Director:** Rebecca S. Gambler, Homeland Security and Justice

**Contact information:** [GamblerR@gao.gov](mailto:GamblerR@gao.gov), (202) 512-8777

## **Transportation Security**

**Transportation Worker Identification Credential: Internal Control Weaknesses Need to Be Corrected to Help Achieve Security Objectives. [GAO-11-657](#). Washington, D.C.: May 10, 2011.**

### **Recommendation:**

To identify effective and cost-efficient methods for meeting Transportation Worker Identification Credential (TWIC) program objectives, and assist in determining whether the benefits of continuing to implement and operate the TWIC program in its present form and planned use with readers surpass the costs, we recommend that the Secretary of Homeland Security conduct an effectiveness assessment that includes addressing internal control weaknesses and, at a minimum, evaluates whether use of TWIC in its present form and planned use with readers would enhance the posture of security beyond efforts already in place given costs and program risks.

### **Action Needed:**

DHS agreed with the recommendation. DHS, through the Transportation Security Administration (TSA), has taken steps to address this recommendation by having an internal controls assessment conducted of the TWIC program's enrollment, background checking, credential issuance, and continued eligibility review. In February 2018, TSA, with assistance from DHS's Science and Technology Directorate, initiated a study with a Homeland Security Operational Analysis Center to conduct an assessment of the TWIC program's security effectiveness in the maritime environment. The study plan sets forth methods for assessing the TWIC program's planned use with card readers. However, the study will not assess information systems controls and related risks for reasonably assuring that use of TWIC with readers and associated systems used for access control decisions are reliable and not surreptitiously altered by cyber intrusions or attack. Moreover, the assessment does not include an assessment of the federally managed single credential approach in contrast to federally regulated decentralized options, such as the Security Identification Display Area airport credentialing model, the Hazardous Materials endorsement for truck drivers (wherein an endorsement is added to a driver's license), the federal government's own agency-specific credentialing model which relies on organizational sponsorship and credentials with agency-specific security features, or any combination thereof. Absent an assessment of controls for ensuring the reliable use of TWIC with readers and the above-noted types of credentialing approaches, the study will fall short in meeting our recommendation and the deficiencies identified in our report. With consideration of the above noted shortfalls, DHS should proceed to conduct an assessment of the TWIC program's effectiveness to determine whether the benefits of continuing to implement and operate the program in its present form and planned use with readers surpass the costs.

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## **Infrastructure and Management**

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

### **Recommendations:**

The Secretary of Homeland Security should work jointly with the Administrator of the General Services Administration (GSA) to:

- conduct a comprehensive needs assessment and gap analysis of current and needed capabilities and an alternatives analysis that identifies the costs and benefits of leasing and construction alternatives, and
- update cost and schedule estimates for the remaining portions of the consolidation project and viable alternatives.

### **Action Needed:**

DHS agreed with the two recommendations. To fully implement the recommendations, DHS and GSA should complete a comprehensive needs assessment, a costs and benefits analysis, and updated cost and schedule estimates taking into consideration new Administration priorities and budget circumstances. After validating the revised consolidation plan, DHS and GSA should submit their findings to Congress in accordance with the Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 (Pub. L. No. 114-150). DHS and GSA are currently drafting a revised consolidation plan per our recommendations, and officials expect that the final plan will be completed and approved in December 2019.

## **High Risk Area: Managing Federal Real Property**

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***Coast Guard: Actions Needed to Close Stations Identified as Overlapping and Unnecessarily Duplicative. GAO-18-9. Washington, D.C.: October 26, 2017.***

### **Recommendation:**

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

### **Action Needed:**

DHS agreed with this recommendation and stated that it continues to evaluate the optimal number, location, and configuration of stations to better meet mission requirements. DHS, through the Coast Guard, stated that it would complete additional analyses of its stations in

early 2018, with changes to operations expected to begin in the fall of 2018. However, as of December 2018, the Coast Guard has not taken steps to address this recommendation. To fully implement these recommendations, the Coast Guard should establish a plan with target dates for closing boat stations that it determined provide overlapping search and rescue coverage and are unnecessarily duplicative.

Recommendation:

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

Action Needed:

DHS agreed with this recommendation and stated that once analyses and plans and target dates were complete, it would solicit and incorporate feedback and begin implementing changes in the fall of 2018. However, as of December 2018, no stations have been closed. DHS, through the Coast Guard, should close the boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

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**Coast Guard Health Records: Timely Acquisition of New System Is Critical to Overcoming Challenges with Paper Process. [GAO-18-59](#). Washington, D.C.: January 24, 2018.**

Recommendation:

The Commandant should direct the Chief Information Officer and the Chief Acquisition Officer to expeditiously and judiciously pursue the acquisition of a new electronic health records (EHR) system.

Action Needed:

DHS agreed with this recommendation and stated that the Coast Guard is judiciously pursuing an electronic health record solution. While the increased involvement of senior leadership in pursuing an electronic health record solution is a positive step, it remains imperative that the Coast Guard expeditiously and judiciously implement an EHR system in order to overcome the challenges the agency currently faces in managing paper health records.

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## **Cybersecurity**

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

### **Recommendations:**

To more fully address the requirements identified in the National Cybersecurity Protection Act of 2014 and the Cybersecurity Act of 2015, we recommended that the Secretary of Homeland Security should:

- develop metrics for assessing adherence to applicable principles in carrying out statutorily required functions, and
- establish methods for monitoring the implementation of cybersecurity functions against the principles on an ongoing basis.

### **Action Needed:**

DHS agreed with the recommendations and has taken the initial steps to address them. Specifically, DHS stated that it continues to determine the applicability of key performance indicators and performance targets, which is intended to enable National Cybersecurity and Communications Integration Center (NCCIC) to assess its effectiveness performing cybersecurity functions in adherence of applicable principles. Specifically, the agency stated that it continues to work towards finalizing Mission Essential Functions and Tasks, and continues to refine applicable program-level measures and metrics. Further, DHS said it is continuing to update NCCIC Strategic Objectives that is intended to align and verify each of the center's goals and reestablish performance reviews to ensure mission effectiveness. The target date for completion of these activities is November 2018 and January 2019, respectively.

## **High Risk Area: Ensuring the Cybersecurity of the Nation**

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**Cybersecurity Workforce: Urgent Need for DHS to Take Actions to Identify Its Position and Critical Skills Requirements. [GAO-18-175](#). Washington, D.C.: February 6, 2018.**

### **Recommendations:**

To help ensure that DHS effectively complete workforce assessment activities to identify, categorize, and assign codes to its cybersecurity positions, we recommend that the Secretary of Homeland Security should:

- ensure that the Office of the Chief Human Capital Officer collects complete and accurate data from its components on all filled and vacant cybersecurity positions when it conducts its cybersecurity identification and coding efforts, and

- develop guidance to assist DHS components in identifying their cybersecurity work categories and specialty areas of critical need that align to the National Initiative for Cybersecurity Education Framework.

Action Needed:

DHS agreed with the recommendations. DHS had plans to issue memorandums that include instructions, guidance, and plans to address these recommendations by periodically reviewing compliance and cybersecurity workforce data concerns with component leads to ensure data accuracy, and disseminating a reporting schedule for identifying cybersecurity critical needs by June 2018. Although DHS has taken some steps towards addressing the recommendations such as developing timeframes and a process for identifying critical needs, it has not yet provided complete evidence that it has fully implemented the recommendations. If implemented, DHS's planned actions would fully address the recommendations.

**High Risk Area: Ensuring the Cybersecurity of the Nation**

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

Recommendation:

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

Action Needed:

DHS agreed with the recommendations and has taken the initial steps to address them. The agency stated it has continued to promote the Framework and gather feedback on Framework use among its critical infrastructure stakeholders. Specifically, DHS stated it has hosted outreach and awareness engagements, including webinars, road shows, conferences, briefings, and regular working group meetings to help organizations understand and use the Framework. Further, DHS stated it has taken steps to determine usage amongst members of the Information Technology Sector. For example, agency officials stated they are collaborating with the Information Technology Sector Coordinating Council (SCC) Small and Midsize Business (SMB) Working Group in a coordinated effort between government and industry to evaluate Framework use and promote continued adoption within the broader Information Technology SMB community. DHS stated that following Office of Management and Budget approval, the Information Technology Sector will administer the SMB Cybersecurity Survey and the DHS Information Technology SCC SMB Working Group will create a formal deliverable for the Information Technology SMB Community. However, DHS has yet to provide evidence regarding efforts to coordinate with the other sectors for which it serves as the sector lead. DHS needs to address Framework adoption in its other sectors. In addition, if the results of the survey yield a methodology for determining the level and type of use of the Framework, DHS should consider

the applicability of taking a similar approach with other sector partners to more adequately satisfy the recommendation.

## **High Risk Area: Ensuring the Cybersecurity of the Nation**

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## **Chemical and Nuclear Security**

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

### Recommendation:

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

### Action Needed:

In August 2018, DHS concurred with our recommendation and estimated that it will complete this effort by September 2019.

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***Nuclear Security: CBP Needs to Take Action to Ensure Imported Radiological Material Is Properly Licensed. [GAO-18-214](#). Washington, D.C.: January 10, 2018.***

### Recommendation:

The Commissioner of CBP should develop a monitoring system to help ensure that CBP officials comply with license verification policies and procedures for imported radiological material.

### Action Needed:

CBP agreed with our recommendation. To fully implement it, CBP should develop a monitoring system that observes agency verification of licenses for imported radiological materials to ensure CBP officials are complying with existing policies and procedures.

### Recommendation:

The Commissioner of CBP should develop a system that better identifies shipments of radiological material that pose the greatest risk and revise CBP's policies and procedures as necessary to verify licenses for these shipments.

Action Needed:

CBP agreed with our recommendation. To fully implement it, CBP should develop a system to better identify which shipments of radiological material pose the greatest risk and revise their policies and procedures for verification of the licenses for these shipments accordingly.

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