

Accessible Version

June 15, 2021

The Honorable Gina M. Raimondo
Secretary
U.S. Department of Commerce
1401 Constitution Ave. NW
Washington, D.C. 20230

Priority Open Recommendations: Department of Commerce

Dear Madam Secretary:

The purpose of this letter is to provide an update on the overall status of the U.S. Department of Commerce's (Commerce) implementation of GAO's recommendations and to call your personal attention to areas where open recommendations should be given high priority.¹ In November 2020, we reported that, government-wide, 77 percent of our recommendations made 4 years ago were implemented.² Commerce's recommendation implementation rate was 87 percent. As of June 2021, Commerce had 89 open recommendations. Fully implementing these open recommendations could significantly improve Commerce's operations.

Since our April 20, 2020, letter, Commerce has implemented nine of our 20 open priority recommendations.

- Commerce addressed three recommendations related to the Decennial Census. We found Commerce took significant steps to improve the risk management of the decennial census by ensuring identified risks had the required mitigation and contingency plans. It also took steps to improve control over how risk and uncertainty are accounted for in the Census Bureau's (Bureau) decennial cost estimation process. Further, Commerce implemented a formal process for tracking and executing appropriate corrective actions to remediate cybersecurity weaknesses identified by the Department of Homeland Security, expeditiously addressing identified deficiencies. As a result of these efforts, Commerce improved its oversight of the decennial census by better positioning itself to manage and mitigate risks as well as cybersecurity weaknesses identified by federal partners.
- Commerce established a process for conducting an organization-wide cybersecurity risk assessment. Establishing a process for aggregating information from sources such as system-level risk assessments, continuous monitoring, and any relevant strategic risk considerations allows the agency to consider the totality of risk derived from the operation and the use of its information systems.

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

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

- Commerce addressed two recommendations related to entrepreneurial assistance programs. Commerce revised information collection instruments that enabled it to track the specific types of assistance programs it provided, and track the entrepreneurs served by those programs. Further, Commerce made additional evaluations to better understand why programs had not met performance goals as well as the entrepreneurial assistance programs' overall effectiveness. These actions have helped Commerce administer its entrepreneurial assistance programs.
- Commerce addressed two recommendations related to Trade Adjustment Assistance (TAA) for Firms program. Commerce broadened its evaluation approach for the TAA for Firms program, which assists trade-impacted, economically distressed U.S. firms. It did so by developing additional quantifiable outcome-oriented performance goals and measures for key program areas. It also conducted further analysis of the data to isolate the impact of the TAA for Firms program from other influences. Additionally, Commerce improved the data available to manage and evaluate the TAA for Firms program. It did so by developing a data system to consistently collect, maintain, and analyze sufficiently reliable and up-to-date data on program operations and participant firms. These actions helped Commerce ensure that the performance measures it used to evaluate the TAA for Firms program demonstrate program results and that the Economic Development Administration can comprehensively evaluate the effectiveness of the program.
- Finally, Commerce supplemented the National Institute of Standards and Technology's (NIST) 2017 technical guidance that effectively prohibits agencies from using knowledge-based verification for sensitive applications. The additional guidance from Commerce assists federal agencies in determining and implementing alternatives to knowledge-based verification that are most suitable for their applications.

Commerce had one priority recommendation related to the decennial census that we closed as not implemented. This recommendation was to ensure the systematic capture of information about fieldwork cases that experience problems by including relevant information in enumerator training. While the Bureau agreed with the recommendation, it was unable to take the necessary actions to implement it for the 2020 Census. Bureau officials said the agency made efforts to improve enumerator instructions and training in its 2016 and 2018 tests, but beyond those efforts, it was unable to provide additional resources to address this recommendation in time for the 2020 Census. Because the technology the Bureau will use in 2030 is likely to be very different than the technology used for the 2020 Census, this recommendation would likely not be applicable to the 2030 Census.

Additionally, Commerce had two priority recommendations that will remain open for the 2030 Census, but are no longer a priority in 2021 because action on these recommendations does not need to occur until later in the 10-year decennial cycle.³

Eight priority recommendations remain from those we identified in our 2020 letter. We ask for your attention to these remaining recommendations. We are also adding three new recommendations this year, as follows: two related to the decennial census; and one related to including forward-looking climate information into design standards and buildings codes. This

³These two recommendations were to identify and implement changes to align census field supervisor screening, authorities, and information flows to allow greater use of the census field supervisor position to provide supervisory support to enumerators, and develop mechanisms to increase coordination and communication between the partnership and local census office staff.

brings the total number of priority recommendations to 11 (see the enclosure for the list of these recommendations).

The 11 priority recommendations fall into the following six major areas.

Managing climate change risks.

The federal government needs a comprehensive approach to improve the resilience of facilities it owns and operates and land it manages. This involves incorporating climate change resilience into agencies' infrastructure and facility planning processes and working with relevant professional associations to incorporate climate change information into structural design standards.

In a November 2016 report, we recommended that Commerce convene federal agencies to provide the best available forward-looking climate information to standards-developing organizations. Commerce neither agreed nor disagreed with this recommendation. In January 2021, the NIST took a first step toward implementation of the recommendation when it held a workshop aimed at connecting the U.S. building codes and standards development communities with agencies and organizations collecting and disseminating climate change information. However, as of April 2021, NIST had yet to fully implement this recommendation.

International trade.

In 2013, we recommended that the Secretary of Commerce—as Chair of the Trade Promotion Coordinating Committee (TPCC)—report in the TPCC's National Export Strategies (NES) on how export promotion resources are allocated by agency and aligned with priorities, as required by the Export Enhancement Act of 1992. While Commerce concurred with the recommendation, officials noted their limited authority over other agencies' budget reporting and resource allocations.

In the years following our 2013 report, TPCC has not issued any NES, except in 2016. The 2016 NES did not include any budget information on how resources were allocated by the agency and aligned with the strategy's priorities. In April 2021, Commerce officials told us they collect budget information from TPCC agencies related to their trade promotion activities; however, this information has not been transmitted to Congress. To implement this recommendation, Commerce needs to work with the other agencies that are members of the committee, including OMB, to compile the relevant export promotion budget information and publish it in an NES, which is to be transmitted annually to designated congressional committees.

IT management and workforce planning.

In a November 2016 report, we evaluated Commerce's implementation of strategic human capital planning practices that were recommended by us, the Office of Personnel Management, and the Office of Management and Budget (OMB). We found that Commerce had yet to establish a process to guide its IT workforce planning activities. In addition, Commerce had either partially or not implemented several activities to assist the agency with effective workforce planning. Accordingly, we recommended that Commerce address these shortfalls to improve its ability to assess and address gaps in knowledge and skills that are critical to the success of major IT acquisitions. Commerce agreed and has fully implemented one activity to date: establishing an IT workforce planning process. Fully implementing the remaining seven activities—including assessing gaps in competencies—would ensure that Commerce has the

necessary knowledge, skills, and abilities to execute a range of management functions that support the agency's mission and goals.

Ensuring the cybersecurity of the nation.

In a March 2019 report, we reviewed Commerce's assigned work roles for information technology (IT), cybersecurity, or cyber-related functions positions. We found that Commerce human resources and IT officials improperly coded IT management occupational series positions. Consequently, we recommended and Commerce agreed that it review the assignment of these positions and assign appropriate National Initiative for Cybersecurity Education (NICE) framework role codes. To fully implement this recommendation, Commerce needs to review the assignment of the "000" code to any positions in the department in the 2210 IT management occupational series and assign the appropriate NICE role codes.

Decennial Census.

We identified six priority recommendations related to the decennial census. Four recommendations on the decennial census were designated a priority in the 2020 letter and remain. One is related to managing cybersecurity weaknesses. The others relate to the planning for the next decennial census. Specifically, while the Bureau agreed with these recommendations it needs to:

- Ensure that identified corrective actions for cybersecurity weaknesses are implemented within prescribed time frames;
- Improve the credibility of schedules, including conducting a quantitative risk assessment;
- Evaluate the extent to which each special enumeration activity improved the count of traditionally hard-to-enumerate groups and use the results to help inform decision-making on spending for these programs; and
- Include estimates of the resources, such as labor, materials, and overhead costs, in the 2030 integrated schedule for each activity as the schedule is built, and prepare to carry out other steps as necessary to conduct systemic schedule risk analyses.

Two new recommendations are being added, as follows:

- In a December 2020 report, we recommended and the Bureau agreed that it update and implement assessments, evaluations, and coverage measurement efforts to address the effects of the Bureau's response to the Coronavirus Disease 2019 (COVID-19) pandemic that we identified, including data quality concerns and potential operational benefits from innovations. We will review the Bureau's progress in addressing the recommendation as part of our ongoing work on the decennial census.
- In March 2021, we recommended and the Bureau agreed that—to inform 2030 planning—it evaluate how major operational changes it made in response to data collection challenges affected the quality and completeness of nonresponse follow-up and group quarters enumerations. In April 2021, Bureau officials told us they were developing an action plan for this recommendation.

Conflict minerals rule.

Armed groups in the eastern Democratic Republic of the Congo continue to profit from the exploitation of minerals, such as gold, tin, tantalum, and tungsten, according to the United Nations. Congress included a provision (Section 1502) in the 2010 Dodd-Frank Wall Street Reform and Consumer Protection Act to, among other things, require Commerce to produce an annual report, beginning in January 2013.⁴ The report includes a list of worldwide conflict mineral processing facilities and an assessment of Independent Private Sector Audits (IPSA) filed in conjunction with Securities and Exchange Commission (SEC) disclosures.

In an August 2016 report, we found that Commerce had yet to submit a report that included an assessment of the accuracy of the IPSAs filed by some companies, nor had it developed a plan to do so. We recommended and Commerce agreed that it submit a plan to the appropriate congressional committees with associated time frames that includes how Commerce assesses the accuracy of IPSAs; develops recommendations for the process used to carry out IPSAs; and acquires the necessary knowledge, skills, and abilities to carry out these responsibilities.

In October 2019, Commerce officials told us that a court case found a relevant element of the SEC rule unconstitutional. Commerce said that until SEC completes its deliberative process, determines how to revise the implementing regulations in light of the court ruling, and implements any necessary revisions to the relevant regulations, the department does not intend to undertake additional work under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act with regard to the assessment of the accuracy of the audits and other due diligence processes or recommendations regarding the audits.

In March 2021, Commerce officials stated that when SEC takes action regarding the relevant regulations, the department will assess how the SEC action affects Commerce's plans for implementing IPSA and our recommendations. Commerce stated that it has not assessed and cannot confirm the number of IPSAs submitted to SEC from 2018 through 2020. To fully implement this recommendation, Commerce needs to submit a plan to the appropriate congressional committees with associated time frames that includes how Commerce assesses the accuracy of IPSAs; develops recommendations for the process used to carry out IPSAs; and acquires the necessary knowledge, skills, and abilities to carry out these responsibilities.

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In March 2021 we issued our biennial update to our [High-Risk List](#), which identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement or the need for transformation to address economy, efficiency, or effectiveness challenges.⁵ One of our high-risk areas, [decennial census](#), centers directly on Commerce. Two high-risk areas, [limiting the federal government's fiscal exposure by better managing climate change risks](#), and [ensuring the effective protection of technologies critical to U.S. national security interests](#) relate to multiple agencies, including Commerce.

⁴Pub. L. No. 111-203, § 1502, 124 Stat. 1376, 2213-18.

⁵GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: Mar. 2, 2021).

Several other government-wide high-risk areas also have direct implications for Commerce and its operations. These include (1) [ensuring the cybersecurity of the nation](#),⁶ (2) [improving the management of IT acquisitions and operations](#), (3) [improving strategic human capital management](#), (4) [managing federal real property](#), and (5) [government-wide personnel security clearance process](#). We urge your attention to the decennial census and the fiscal risks of climate change high-risk areas as well as the government-wide high risk issues as they relate to Commerce. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, OMB, and the leadership and staff in agencies, including within Commerce.

Copies of this report are being sent to the Director of the Office of Management and Budget and appropriate congressional committees: the Committees on Appropriations, Budget, Homeland Security and Governmental Affairs, and Commerce, Science and Transportation, United States Senate; and the Committees on Appropriations, Budget, Oversight and Reform, and Energy and Commerce, House of Representatives. In addition, the report will be available on the GAO website at <http://www.gao.gov>.

I appreciate Commerce'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 Michelle Sager, Managing Director, Strategic Issues at sagerm@gao.gov or 202-512-6806. 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 89 open recommendations, as well as those additional recommendations in the high-risk areas for which Commerce has a leading role. Thank you for your attention to these matters.

Sincerely yours,



Gene L. Dodaro
Comptroller General
of the United States

Enclosure - 1

cc: The Honorable Shalanda Young, Acting Director, Office of Management and Budget
Wynn W. Coggins, Acting Deputy Secretary, Department of Commerce
Dr. Ron Jarmin, Acting Director of the Census Bureau
MaryAnn Mausser, GAO Liaison Officer
Corey J. Kane, DOC/Bureau of the Census
Amy Egan, NIST OIG/GAO Liaison
Catherine Fletcher, NIST/DOC

⁶With regard to cybersecurity, we also urge you to use foundational information and communications technology supply chain risk management practices set forth in our December 2020 report: GAO, *Information Technology: Federal Agencies Need to Take Urgent Action to Manage Supply Chain Risks*, [GAO-21-171](#) (Washington, D.C.: Dec. 15, 2020).

Enclosure - Department of Commerce (Commerce) Priority Recommendations

Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks

Improved Federal Coordination Could Facilitate Use of Forward-Looking Climate Information in Design Standards, Building Codes, and Certifications. [GAO-17-3](#). Washington, D.C.: November 30, 2016.

Recommendation: To help reduce federal fiscal exposure by enhancing the resilience of infrastructure to extreme weather, the Secretary of Commerce, through the Director of National Institute of Standards and Technology (NIST), in consultation with the Mitigation Framework Leadership Group and U.S. Global Change Research Program, should convene federal agencies for an ongoing government wide effort to provide the best available forward-looking climate information to standards-developing organizations for their consideration in the development of design standards, building codes, and voluntary certifications.

Action Needed: Commerce neither agreed nor disagreed with our recommendation. In January 2021, NIST took a first step toward implementing the recommendation when it held a workshop aimed at connecting the U.S. building codes and standards development communities with agencies and organizations collecting and disseminating climate change information. However, as of April 7, 2021, NIST has yet to convene a government-wide effort to provide the best available forward-looking climate information to standards-developing organizations.

High Risk Area: [Limiting the Federal Government's Fiscal Exposure by Better Managing Climate Change Risks](#)

Director: J. Alfredo Gómez, Natural Resources and Environment

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International Trade

Export Promotion: Better Information Needed about Federal Resources. [GAO-13-644](#). Washington, D.C.: July 17, 2013.

Recommendation: To improve the consistency, comprehensiveness, and transparency of information provided to Congress and policymakers on the federal investment in export promotion programs, the Secretary of Commerce, as chair of the Trade Promotion Coordinating Committee (TPCC), should report in its National Export Strategies (NES) how resources are allocated by agency and aligned with priorities.

Action Needed: Commerce agreed with this recommendation in 2013. In April 2021, Commerce officials told us they collect budget information from TPCC agencies related to trade promotion activities; however, this information has not been transmitted to Congress. To implement this recommendation, Commerce needs to work with the other agencies that are members of the committee, including the Office of Management and Budget, to compile the relevant export promotion budget information and publish it in an NES, which is to be transmitted annually to designated congressional committees pursuant to the Export Enhancement Act.⁷

⁷15 U.S.C. § 4727.

Director: Kimberly M. Gianopoulos, International Affairs Trade

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Information Technology Management and Workforce Planning

IT Workforce: Key Practices Help Ensure Strong Integrated Program Teams; Selected Departments Need to Assess Skill Gaps. GAO-17-8. Washington, D.C.: November 30, 2016.

Recommendation: To facilitate the analysis of gaps between current skills and future needs, the development of strategies for filling the gaps, and succession planning, the Secretary of Commerce should require the Chief Information Officer, Chief Human Capital Officer, and other senior managers as appropriate to address the shortfalls in IT workforce planning noted in this report, including the following actions: (1) establish and maintain a workforce planning process; (2) develop competency and staffing requirements; (3) assess competency and staffing needs regularly; (4) assess gaps in competencies for all components of the workforce; (5) develop strategies and plans to address gaps in competencies and staffing; (6) implement activities that address gaps, including an IT acquisition cadre, cross-functional training of acquisition and program personnel, a career path for program managers, and special hiring authorities, if justified and cost-effective; (7) monitor the department's progress in addressing IT competency and staffing gaps; and (8) report to department leadership on progress in addressing competency and staffing gaps.

Action Needed: Commerce agreed with this recommendation and, as of April 2021, has fully implemented one workforce planning activity and taken steps to implement others. Specifically, in July 2020, Commerce provided evidence that it had fully implemented the activity to establish an IT workforce planning process. However, while the agency reported that it planned to implement the activities to assess gaps in competencies, and to develop strategies and plans to address the gaps by the end of fiscal year 2020, it had not provided evidence that it had implemented these activities as of April 2021. For example, Commerce provided IT competency and workforce assessments individual components had performed. However, it did not provide evidence of such assessments performed at the agency level. In addition, Commerce stated that it had developed an IT competency model, but did not provide documentation. To fully implement this recommendation, Commerce needs to continue its ongoing efforts to fully implement the remaining seven IT workforce planning activities at the agency level.

High Risk Area: [Improving the Management of IT Acquisitions and Operations](#)

Director: Carol C. Harris, Information Technology and Cybersecurity

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Ensuring the Cybersecurity of the Nation

Cybersecurity Workforce: Agencies Need to Accurately Categorize Positions to Effectively Identify Critical Staffing Needs. GAO-19-144. Washington, D.C.: March 12, 2019.

Recommendation: The Secretary of Commerce should take steps to review the assignment of the "000" code to any positions in the department in the 2210 information technology (IT) management occupational series and assign the appropriate National Initiative for Cybersecurity Education framework work role codes.

Action Needed: Commerce agreed with the recommendation, but as of January 2021, had yet to provide sufficient evidence that it had implemented the recommendation. The department plans to implement the recommendation by December 31, 2021. We will continue to monitor the situation.

High Risk Area: [Ensuring the Cybersecurity of the Nation](#)

Director: Dave Hinchman, Information Technology and Cybersecurity

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Decennial Census

Decennial Census: Bureau Should Assess Significant Data Collection Challenges as It Undertakes Planning for 2030. [GAO-21-365](#). Washington, D.C.: March 22, 2021.

Recommendation: The Secretary of Commerce and the Director of the U.S. Census Bureau should, to inform 2030 planning, evaluate how major operational changes in response to data collection challenges affected the quality and completeness of nonresponse follow-up and group quarters enumerations. At a minimum, this evaluation should address:

- late design changes,
- procedures for accessing multi-unit buildings,
- the process for reassigning cases,
- supervisory alerts used to manage enumerators,
- quality control over training assessments, and
- the eResponse option for group quarter data collection.

Action Needed: Commerce agreed with our recommendation. In its March 2021 response to the draft report, the Census Bureau (Bureau) stated that it was already taking steps to implement the recommendation, including the establishment of the Data Quality Executive Guidance Group and external assessments from JASON (an independent scientific advisory group) and the American Statistical Association Quality Indicators Task Force. In April 2021, Bureau officials told us it was developing an action plan for this recommendation.

High Risk Area: [Decennial Census](#)

Director: Yvonne Jones, Strategic Issues

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2020 Census: Census Bureau Needs to Assess Data Quality Concerns Stemming from Recent Design Changes. [GAO-21-142](#). Washington, D.C.: December 3, 2020.

Recommendation: The Secretary of Commerce and the Director of the Census Bureau should update and implement assessments, evaluations, and coverage measurement efforts to address the effects of the Bureau's response to Coronavirus Disease 2019 (COVID-19) that we identified, including data quality concerns and potential operational benefits from innovations.

Action Needed: Commerce agreed with our recommendation. In May 2021, agency officials provided us with updates of their template and guidance for the Bureau's planned operational assessments demonstrating that authors of the assessments were to include descriptions of changes to operations made due to the COVID-19 pandemic, such as schedule changes. The updates that Commerce provided regard only the operational assessments, and elicit itemized operational changes, but do not suggest any treatment or narrative on the effects of those changes on data quality. To close this recommendation, the Bureau's assessments, evaluations, and coverage measurement efforts will need to address the effects of the changes to operations, such as those we identified and inclusive of those on data quality and possible operational benefits that may have been unexpected.

High Risk Area: [Decennial Census](#)

Director: Yvonne Jones, Strategic Issues

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2020 Census: Further Actions Needed to Reduce Key Risks to a Successful Enumeration. [GAO-19-431T](#). Washington, D.C.: April 30, 2019.

Recommendation: The Secretary of Commerce should direct the Director of the Census Bureau to direct the Census Bureau's Chief Information Officer to take steps to ensure that identified corrective actions for cybersecurity weaknesses are implemented within prescribed time frames.

Action Needed: Commerce agreed with this recommendation and the Bureau has developed plans aimed at implementing it. For example, in December 2020, Bureau officials stated that they are in the process of implementing a dashboard to track their progress in implementing corrective actions for cybersecurity weaknesses, changing the way they address the corrective actions, and holding briefings to discuss open corrective actions that have been delayed. However, as of March 2021, the Bureau still had a significant number of open corrective actions that it considered "high" or "very high" risk. Importantly, the number of these cybersecurity corrective actions that have been delayed had not notably decreased since our April 2019 recommendation. We will continue to review the Bureau's progress in addressing this recommendation as part of our ongoing work on the 2020 Census.

High Risk Area: [Decennial Census](#)

Director: Nick Marinos, Information Technology and Cybersecurity

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2020 Census: Bureau Needs to Improve Scheduling Practices to Enhance Ability to Meet Address List Development Deadlines. [GAO-14-59](#). Washington, D.C.: November 21, 2013.

Recommendation: To help maintain a more thorough and insightful 2020 Census development schedule to better manage risks to a successful 2020 Census, the Secretary of Commerce and Undersecretary for Economic Affairs should direct the Census Bureau to improve the credibility of schedules, including conducting a quantitative risk assessment.

Action Needed: Commerce agreed with this recommendation. To fully implement this recommendation, the Bureau needs to conduct quantitative schedule risk analyses with its master schedule. The Bureau took steps toward conducting quantitative schedule risk analyses with its master activity schedule for the 2020 Census, but effectively ran out of time to do so.

Assigning resources to large complex schedules to conduct such analyses is easier to do early in the schedule development process, as we recommended the Bureau do in 2009 for its 2020 Census schedule. This recommendation will remain open pending the Bureau carrying out quantitative risk assessments of its 2030 schedule with appropriate resources linked to it.

High Risk Area: [Decennial Census](#)

Director: Yvonne Jones, Strategic Issues

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2010 Census: Key Efforts to Include Hard-to-Count Populations Went Generally as Planned; Improvements Could Make the Efforts More Effective for Next Census. [GAO-11-45](#). Washington, D.C.: December 14, 2010.

Recommendation: To help improve the effectiveness of the Census Bureau's outreach and enumeration efforts, especially for hard-to-count (HTC) populations, should they be used again in the 2020 Census, and to improve some of the Bureau's key efforts to enumerate HTC populations, the Secretary of Commerce should require the Under Secretary for Economic Affairs as well as the Director of the Census Bureau to evaluate the extent to which each special enumeration activity improved the count of traditionally hard-to-enumerate groups and use the results to help inform decision making on spending for these programs in 2020.

Action Needed: Commerce generally agreed with this recommendation, but as of May 2021, had not implemented it. To fully implement this recommendation, the Bureau needs to demonstrate how it is relying on data about how various special enumeration activities of historically hard-to-enumerate groups contributed to coverage in the 2010 Census and the 2020 Census to inform its design for the 2030 Census.

High Risk Area: [Decennial Census](#)

Director: Yvonne Jones, Strategic Issues

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2010 Census: Census Bureau Has Made Progress on Schedule and Operational Control Tools, but Needs to Prioritize Remaining System Requirements. [GAO-10-59](#). Washington, D.C.: November 13, 2009.

Recommendation: To improve the Census Bureau's use of its master schedule to manage the 2020 Decennial Census, the Secretary of Commerce should require the Director of the Census Bureau to include estimates of the resources, such as labor, materials, and overhead costs, in the 2020 integrated schedule for each activity as the schedule is built, and prepare to carry out other steps as necessary to conduct systemic schedule risk analyses on the 2020 schedule.

Action Needed: Commerce neither agreed nor disagreed with this recommendation. We reviewed actions on this recommendation in July 2018 and noted that that the Bureau had begun taking steps to prepare for schedule risk analyses. The Bureau took steps toward assigning resources to its master activity schedule for the 2020 Census, but effectively ran out of time to do so. Assigning resources to large complex schedules is easier to do early in the schedule development process, as we recommended the Bureau do in 2009 for its 2020 Census schedule. As of May 2021, this recommendation remains open. To implement this recommendation, the Bureau will need to develop its 2030 schedule with the appropriate resources linked to it.

High Risk Area: [Decennial Census](#)

Director: Yvonne Jones, Strategic Issues

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Conflict Minerals Rule

SEC Conflict Minerals Rule: Companies Face Continuing Challenges in Determining Whether Their Conflict Minerals Benefit Armed Groups. [GAO-16-805](#). Washington, D.C.: August 25, 2016.

Recommendation: To improve the effectiveness of the Securities and Exchange Commission's (SEC) conflict minerals disclosure rule, the Secretary of Commerce should submit to the appropriate congressional committees a plan outlining steps that Commerce will take, with associated timeframes, to (1) assess the accuracy of the independent private sector audits (IPSA) and other due diligence processes described under section 13(p) of the Securities Exchange Act of 1934; (2) develop recommendations for the process used to carry out such audits, including ways to improve the accuracy of the audits and establish standards of best practices for such audits; and (3) acquire the necessary knowledge, skills, and abilities to carry out these responsibilities.

Action Needed: Commerce agreed with this recommendation. In March 2021, Commerce stated that the department has not assessed the IPSAs submitted to SEC in 2018, 2019, or 2020, and cannot confirm how many IPSAs were submitted in each of those years. Commerce officials reiterated that when SEC takes action regarding the relevant regulations, the department will assess how the SEC action affects the department's plans for implementing the Secretary's responsibilities under Section 1502 and our recommendation.

To fully implement this recommendation, Commerce needs to submit a plan to the appropriate congressional committees with associated time frames that include how Commerce will improve the accuracy of the audits and establish standards of best practices for such audits; develop recommendations for the process used to carry out such audits; and acquire the necessary knowledge, skills, and abilities to carry out these responsibilities.

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