



Testimony  
Before the Subcommittee on Oversight,  
Management, and Accountability,  
Committee on Homeland Security,  
House of Representatives

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# DEPARTMENT OF HOMELAND SECURITY

## Progress Made Strengthening Management Functions, but Work Remains

Statement of Chris Currie  
Director, Homeland Security and Justice

Accessible Version

# GAO Highlights

Highlights of [GAO-21-105418](#), a testimony before the Subcommittee on Oversight, Management, and Accountability, Committee on Homeland Security, House of Representatives.

## Why GAO Did This Study

The events of September 11, 2001, led to profound changes in government agendas, policies, and structures to confront homeland security threats. In 2003, DHS began operations, with missions to prevent terrorist attacks and reduce the country's vulnerability to future terrorism. GAO's High-Risk List identifies programs and operations (such as DHS's management functions) that are vulnerable to waste, fraud, abuse, or mismanagement, or in need of transformation. GAO's five criteria for removing areas from the High-Risk List guide the assessment of DHS's progress.

This statement addresses DHS's progress and actions needed to strengthen its management functions. It is based on reports in GAO's high-risk series, including its most recent March 2021 update, as well as selected updates on DHS's efforts as of September 2021. For this work, GAO analyzed DHS documents and data and interviewed DHS officials.

### DHS Progress against High-Risk List

#### Removal Criteria

#### Strengthening Department of Homeland Security Management Functions



Source: GAO analysis. | [GAO-21-105418](#)

View [GAO-21-105418](#). For more information, contact Chris Currie (404) 679-1875, [curriec@gao.gov](mailto:curriec@gao.gov)

September 30, 2021

## DEPARTMENT OF HOMELAND SECURITY

### Progress Made Strengthening Management Functions, but Work Remains

#### What GAO Found

Shortly after the Department of Homeland Security (DHS) was formed, GAO designated implementing and transforming DHS as a high-risk area to the federal government because it had to transform 22 agencies—several with major management challenges—into one department.

**Progress made.** In 2013, GAO reported that challenges remained for DHS across its range of missions, but that the department had made considerable progress transforming its original component agencies into a single cabinet-level department. As a result, GAO narrowed the scope of the high-risk area to focus on strengthening DHS management functions—specifically acquisition, information technology, financial, and human capital management.

DHS's efforts to strengthen and integrate its management functions have resulted in the department meeting 3 of 5 criteria for removal from GAO's High-Risk List—demonstrating leadership commitment, having an action plan, and monitoring the effectiveness of its actions. DHS has partially met the remaining two criteria for removal—having sufficient capacity and demonstrating progress.

Several factors contributed to DHS's success in narrowing the scope of the high-risk area. These include:

- DHS's top leaders demonstrated leadership commitment and support for addressing the department's challenges, which helped ensure sustained, consistent progress in this high-risk area.
- DHS consistently communicated its efforts and regularly sought constructive and specific feedback from GAO on its strategy and approach to addressing the high-risk area.

**Work remaining.** Continued progress for this high-risk area depends on DHS addressing its remaining management challenges. For example, DHS needs to make additional progress identifying and allocating resources in acquisition and financial management. For instance:

- DHS lacks acquisition support staffing plans and has not clearly defined which acquisition positions are critical for oversight responsibilities, limiting DHS's insight into whether it has appropriate staff to carry out its duties.
- DHS's financial statement auditor identified several capacity-related issues, including resource limitations and inadequate staff training, resulting in material weaknesses in its 2020 financial statements.

DHS also has work remaining to demonstrate progress implementing corrective measures. Specifically, of the 30 outcome measures GAO uses to gauge the department's progress, DHS has not yet fully addressed 12 of 30 measures. For example, DHS needs to effectively implement its long-term financial systems modernization efforts and use department-wide training data to inform its human capital programs.

In the coming years, DHS needs to continue implementing its remaining work and sustaining its progress to-date.

Chairman Correa, Ranking Member Meijer, and Members of the Subcommittee:

I am pleased to be here today to discuss the Department of Homeland Security's (DHS) management challenges and its progress in addressing them. The nation recently passed the 20-year anniversary of the September 11, 2001, terrorist attacks. The events of that day led to profound changes in government agendas, policies, and structures to confront homeland security threats facing the nation. Most notably, DHS began operations in 2003 with key missions that included preventing terrorist attacks from occurring in the United States, reducing the country's vulnerability to terrorism, and minimizing the damages from any attacks that may occur. This milestone provides an opportunity to reflect on the progress DHS has made since its establishment and challenges it continues to face.

In 2003, shortly after the department was formed, we designated *Implementing and Transforming DHS* as a high-risk area to the federal government.<sup>1</sup> DHS has since taken steps to address this high-risk area, including implementing key homeland security operations and achieving important goals in many areas. For example, DHS has implemented 73 percent of the approximately 6,200 recommendations we have made since 2003, resulting in strengthened program management, performance measurement, and other impacts. As DHS matured and evolved, we narrowed the focus of this high-risk area in 2013 to *Strengthening DHS Management Functions*. This narrowing recognized DHS's progress and the significant challenges that remained. We continue to closely monitor DHS's efforts and regularly meet with DHS management to discuss progress.

Our five criteria for removing areas from the High-Risk List guide our discussions with DHS and our assessments of its progress. Specifically, the agency must have (1) a demonstrated strong commitment and top leadership support to address the risks (leadership commitment); (2) the capacity—the people and other resources—to resolve the risks (capacity); (3) a corrective action plan that identifies the root causes,

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<sup>1</sup>GAO's High-Risk List identifies programs and operations that are vulnerable to waste, fraud, abuse, or mismanagement, or in need of transformation. We issue an update to the High-Risk List every 2 years at the start of each new session of Congress. Our most recent update was issued in March 2021. See GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: Mar. 2, 2021).

identifies effective solutions, and provides for substantially completing corrective measures in the near term, including but not limited to steps necessary to implement solutions we recommended (action plan); (4) a program instituted to monitor and independently validate the effectiveness and sustainability of corrective measures (monitoring); and (5) the ability to demonstrate progress in implementing corrective measures (demonstrated progress)

My statement discusses DHS's progress addressing high-risk issues and remaining actions needed to strengthen and integrate its management functions. This statement is based on reports in our high-risk series, including our most recent March 2021 high-risk update, as well as selected updates on employee engagement as of September 2021 based on our ongoing monitoring of DHS's efforts to address this high-risk area.<sup>2</sup> For this work, we analyzed DHS strategies and other documents related to the department's efforts to address its high-risk areas and interviewed DHS officials, among other actions. More detailed information on the scope and methodology of our prior work can be found within each specific report. We provided the information from our ongoing monitoring effort to DHS for review. DHS provided technical comments, which we incorporated as appropriate.

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

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<sup>2</sup>See, for example, [GAO-21-119SP](#); GAO, *High Risk: Important Progress Made, but More Work Needed to Strengthen DHS Management*, [GAO-19-475T](#) (Washington, D.C.: Apr. 3, 2019), and *High-Risk Series: An Update*, [GAO-13-283](#) (Washington, D.C.: Feb. 2013).

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## DHS Continues to Work to Address its High-Risk Issues

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### DHS's Progress Led to Narrowing the High-Risk Focus to DHS Management Functions

In 2003, we designated implementing and transforming DHS as high risk because DHS had to transform 22 agencies—several with major management challenges—into one department. Further, failure to effectively address DHS's management and mission risks could have serious consequences for U.S. national and economic security. Given the significant effort required to build and integrate a department as large and complex as DHS, our initial high-risk designation addressed the department's initial transformation and subsequent implementation efforts.

In 2007 and 2009, we reported that DHS made progress implementing its range of missions and that it needed to address various programmatic and management challenges. DHS's initial focus on implementing its mission was understandable given the critical homeland security needs facing the nation at the time, as well as the unique challenges facing DHS in creating, integrating, and transforming the department.

In 2011, we reported in our assessment of DHS's progress and challenges 10 years after 9/11 that the department had implemented key homeland security operations and achieved important goals in many areas, thus creating a foundation for reaching its potential.<sup>3</sup> However, we also identified that DHS needed to complete more work to address weaknesses in its operational and implementation efforts, including strengthening the efficiency and effectiveness of those efforts. We further

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<sup>3</sup>GAO, *Department of Homeland Security: Progress Made and Work Remaining in Implementing Homeland Security Missions 10 Years after 9/11*, [GAO-11-881](#) (Washington, D.C.: Sept. 7, 2011). This report addressed DHS's progress in implementing its homeland security missions since it began operations, work remaining, and issues affecting implementation efforts. Drawing from over 1,000 GAO reports and congressional testimony related to DHS programs and operations, and approximately 1,500 recommendations made to strengthen mission and management implementation, this report addressed progress and remaining challenges in such areas as border security and immigration, transportation security, and emergency management, among others.

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reported that continuing weaknesses in DHS's management functions had been a key theme hindering the department's implementation efforts.

In 2013, we reported that challenges remained for DHS across its range of missions, but that the department had made considerable progress transforming its original component agencies into a single cabinet-level department. As a result, we narrowed the scope of the high-risk area to focus on strengthening DHS management functions—acquisition, information technology (IT), financial, and human capital management—in addition to integrating these management functions. Management integration requires DHS to implement actions and outcomes in each management area to develop consistent or consolidated processes and systems within and across its management functional areas (such as better managing investments and management functions across the department's component agencies). We also changed the name of the high-risk area to *Strengthening DHS Management Functions* to reflect this focus.<sup>4</sup>

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## DHS Has Made Progress in Strengthening Its Management Functions, but Work Remains

DHS's efforts to strengthen and integrate its acquisition, IT, financial, and human capital management functions have resulted in the department meeting three of five criteria for removal from the High-Risk List—leadership commitment, action plan, and monitoring. DHS has partially met the remaining two criteria—capacity and demonstrated progress, as shown in figure 1.

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<sup>4</sup>[GAO-13-283](#).

**Figure 1: GAO's 2021 High-Risk Rating for Strengthening Department of Homeland Security Management Functions**



Source: GAO analysis. | GAO-21-105418

**Text of Figure 1: GAO's 2021 High-Risk Rating for Strengthening Department of Homeland Security Management Functions**

### **Strengthening Department of Homeland Security Management Functions**

- Leadership Commitment: Met
- Capacity: Partially Met
- Action Plan: Met
- Monitoring: Met
- Demonstrated Progress: Partially Met

Source: GAO analysis. | GAO-21-105418

**Leadership commitment.** DHS's top leaders have continued to demonstrate commitment and support for addressing the department's management challenges. They have also taken actions to institutionalize this commitment to help ensure the success of the department's efforts. For example, the Deputy Under Secretary for Management issued strategic guidance to DHS's component agencies encouraging investment in areas critical to DHS management functions, including financial system modernization, human resource training, and career development programs. Furthermore, top DHS leaders, such as the Under Secretary for Management and the department's Chief Executive

Officers, routinely meet with GAO management to discuss progress on this high-risk area.

**Action plan and Monitoring.** DHS's Management Directorate produced the department's first Integrated Strategy for High-Risk Management in January 2011 and has since issued 19 updated versions. DHS's next update is planned for fall 2021. The most recent strategy from March 2021 describes DHS's progress and planned corrective actions to further strengthen its management functions. If effectively implemented and sustained, the Integrated Strategy for High-Risk Management provides a path for DHS to be removed from our High-Risk List.

**Capacity.** DHS has partially demonstrated sufficient capacity (i.e., the people and other resources to resolve the identified risks) but needs to make additional progress identifying and allocating resources in acquisition and financial management. In October 2020, we reviewed DHS Component Acquisition Executive (CAE) roles and responsibilities for oversight, policy, and acquisition workforce and found that not all CAEs prepared support staffing plans, and DHS has not clearly defined which acquisition positions are critical to carry out oversight responsibilities.<sup>5</sup> Without complete support staffing plans and clearly defined critical positions—the expertise needed at minimum to support oversight of cost, schedule, and performance—DHS lacks insight into whether it has the appropriate staff to carry out primary oversight responsibilities. Additionally, in 2020, DHS's financial statement auditor identified several capacity-related issues, including resource limitations, inadequate management, and inadequate staff training as causes for the material weaknesses reported.<sup>6</sup>

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<sup>5</sup>Component Acquisition Executives—with the exception of those in DHS's Management Directorate—are senior acquisition executives below the department level within DHS components. For example, DHS components include the United States Coast Guard, Customs and Border Protection, and the Transportation Security Administration. Component Acquisition Executives have acquisition responsibilities in four key areas: oversight, policy, acquisition workforce, and acquisition data support. The Management Directorate differs because organizationally it resides at the department level, has five separate Component Acquisition Executives (or individuals performing the duties of the Component Acquisition Executive), and provides support to the DHS operational components. GAO, *Homeland Security Acquisitions: DHS Has Opportunities to Improve Its Component Acquisition Oversight*, [GAO-21-77](#) (Washington, D.C.: Oct. 20, 2020).

<sup>6</sup>DHS Office of Inspector General, *Independent Auditors' Report on DHS' FY 2020 Financial Statements and Internal Control over Financial Reporting*, [OIG-21-08](#) (Washington, D.C.: Nov. 13, 2020).



**Demonstrated progress.** The final criterion, demonstrated progress (i.e., the ability to demonstrate progress in implementing corrective measures), remains partially met. In 2010, we identified 30 specific outcomes in the areas of acquisition management, IT management, financial management, human capital management, and management integration that are critical to addressing the department’s overall management challenges. DHS agreed with these outcomes, and they have since become the key criteria by which we gauge DHS’s demonstrated progress. As of September 2021, DHS has fully addressed 18 of the 30 outcomes, mostly addressed four, partially addressed five, and initiated actions to address the remaining three, as shown in table 1.

**Table 1: GAO Assessment of Department of Homeland Security (DHS) Progress across Management Areas, as of September 2021**

Key management function	Fully addressed <sup>a</sup>	Mostly addressed <sup>b</sup>	Partially addressed <sup>c</sup>	Initiated <sup>d</sup>	Total
Acquisition management	2	3			5
Information technology management	5		1		6
Financial management	2		3	3	8
Human capital management	6	1			7
Management integration	3		1		4
<b>Total</b>	<b>18</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>30</b>

Source: GAO analysis of DHS documents, interviews, and prior GAO reports. | GAO-21-105418

<sup>a</sup>“Fully addressed”: Outcome is fully addressed.

<sup>b</sup>“Mostly addressed”: Progress is significant and a small amount of work remains.

<sup>c</sup>“Partially addressed”: Progress is measurable, but significant work remains.

<sup>d</sup>“Initiated”: Activities have been initiated to address the outcome, but it is too early to report progress.

In recent years, DHS has made particular progress in the areas of IT management and human capital management. Specifically, since 2017, DHS has taken steps to fully address five outcomes across these two management areas. First, DHS fully addressed two IT management outcomes by (1) providing ongoing oversight and support to troubled IT investments to help improve their cost, schedule, and performance and (2) demonstrating significant progress in implementing its IT strategic workforce planning initiative. Additionally, the department fully addressed three key human capital management outcomes by (1) demonstrating that components are basing hiring decisions and promotions on human capital competencies, (2) strengthening efforts to obtain employee input, and (3) improving its employee engagement scores as measured by the

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Office of Personnel Management's (OPM) Federal Employee Viewpoint Survey.<sup>7</sup>

Important progress and remaining work in all of the five management functions includes:

- **Acquisition management.** DHS has taken steps to strengthen requirements development across the department, such as re-establishing the Joint Requirements Council in June 2014.<sup>8</sup> However, DHS continues to face challenges in effectively executing its acquisition portfolio. In May 2018, we found that enhancements to DHS's acquisition management, resource allocation, and requirements policies largely reflected key portfolio management practices. However, in January 2021, we found that 10 of the 24 major acquisition programs we assessed with approved schedule and cost baseline goals did not meet a goal at some point in fiscal year 2020.<sup>9</sup>

Some of these instances were because of factors outside of a program's control, such as the Coronavirus Disease 2019 pandemic. However, we also reported that in some instances, DHS did not implement sound acquisition practices. For example, two of the 10 programs failed to meet their cost or schedule goals because of an underestimation of the programs' complexity or requirements. Further, we found that some of the programs that were meeting their currently established goals were at risk of future cost growth or schedule slips. Although the department had various assessment mechanisms to review individual program progress, it had not yet established an integrated approach to assess the performance of and inform oversight of its overall acquisition portfolio.

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<sup>7</sup>The Federal Employee Viewpoint Survey is a tool that measures employees' perceptions of whether and to what extent conditions characterizing successful organizations are present in their agency.

<sup>8</sup>In November 2014, in response to a GAO recommendation, DHS reestablished the Joint Requirements Council that it had dissolved in 2006, to review requirements submitted by DHS's component agencies (e.g., the Transportation Security Administration). The purpose of the council is to validate and prioritize operational requirements—those capabilities that are necessary to conduct DHS's mission—for all major acquisitions and to ensure that objective, analytical rigor supports these requirements.

<sup>9</sup>GAO, *DHS Annual Assessment: Most Acquisition Programs Are Meeting Goals but Data Provided to Congress Lacks Context Needed for Effective Oversight*, [GAO-21-175](#) (Washington, D.C.: Jan. 19, 2021).

- **IT management.** DHS has continued to sustain and mature its department-wide Enterprise Architecture program over the past 6 years. For example, in response to our recommendations, the DHS Chief Information Officer developed a fiscal year 2020–2023 Enterprise Architecture Strategic Plan to provide strategic direction for delivering IT services and solutions across the department.<sup>10</sup> Further, in response to other recommendations, the department has continued to manage its IT investments using an IT portfolio management approach.<sup>11</sup> For example, in fiscal year 2020, the Office of the Chief Information Officer (OCIO) produced portfolio data and analysis related to each of the department’s seven IT portfolios. OCIO officials reported that the Chief Information Officer and other DHS leadership used this information to support IT investment oversight and resource allocation recommendations. This portfolio management approach should enable DHS to identify potentially duplicative investments and opportunities to consolidate investments, as well as reduce component-specific investments.

In addition, DHS has made progress implementing recommendations identified in the fiscal years 2016 to 2018 DHS Office of the Inspector General’s (OIG) reports related to IT security weaknesses. However, much work remains for DHS to enhance its information security program. In September 2020, the OIG reported that the department’s information security program was ineffective for fiscal year 2019.<sup>12</sup> Specifically, the OIG identified that DHS did not have an effective strategy or department-wide approach to manage risks for all of its systems, nor did it apply timely security patches and updates to mitigate critical and high-risk security vulnerabilities on selected components’ systems, among other issues.

Additionally, in fiscal year 2020, the department’s financial statement auditor identified that DHS had ineffective design and implementation of controls to remediate IT findings, including insufficient corrective actions to address deficiencies that have existed for several years in multiple information systems. Further, for the 17th consecutive year,

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<sup>10</sup>GAO, *Homeland Security: DHS Enterprise Architecture Continues to Evolve but Improvements Needed*, [GAO-07-564](#) (Washington, D.C.: May 09, 2007), and GAO, *Homeland Security: Efforts Under Way to Develop Enterprise Architecture, but Much Work Remains*, [GAO-04-777](#) (Washington, D.C.: Aug. 06, 2004).

<sup>11</sup>GAO, *Information Technology: DHS Needs to Further Define and Implement Its New Governance Process*, [GAO-12-818](#) (Washington, D.C.: July 25, 2012).

<sup>12</sup>DHS Office of Inspector General, *Evaluation of DHS’ Information Security Program for Fiscal Year 2019 (REDACTED)*, OIG-20-77 (Washington, D.C.: Sept. 30, 2020).

the auditor designated deficiencies in IT systems controls as a material weakness for financial reporting purposes. As a result, since our 2019 report, DHS has moved from a mostly addressed to a partially addressed rating for one IT management area outcome on IT security. OCIO officials informed us that they are taking steps to address this outcome, such as conducting an independent verification and validation of plans of actions and milestones and performing configuration audit checks for selected operating systems.

- **Financial management.** DHS received an unmodified audit opinion on its financial statements for 8 consecutive years—fiscal years 2013 to 2020.<sup>13</sup> However, for fiscal years 2019 and 2020, DHS’s financial statement auditor reported two material weaknesses in the areas of (1) financial reporting, and (2) IT controls and information systems, as well as instances of noncompliance with laws and regulations. According to the auditor, these two material weaknesses led to an adverse opinion on internal controls over financial reporting. These deficiencies hamper DHS’s ability to provide reasonable assurance that its financial reporting is reliable and the department is in compliance with applicable laws and regulations. For DHS to obtain and sustain an unmodified audit opinion on its internal controls over financial reporting, and to achieve substantial compliance with the Federal Financial Management Improvement Act of 1996, DHS needs to continue to strengthen its financial management controls and ensure that key controls are in place to address the auditor’s findings related to the two material weaknesses.

In addition, much work remains to modernize DHS components’ financial management systems and business processes. Specifically, DHS needs to effectively implement its long-term financial systems modernization efforts at the U.S. Coast Guard, the Federal Emergency Management Agency, and U.S. Immigration and Customs Enforcement. DHS also needs to ensure that key controls are in place to address the auditor’s findings.

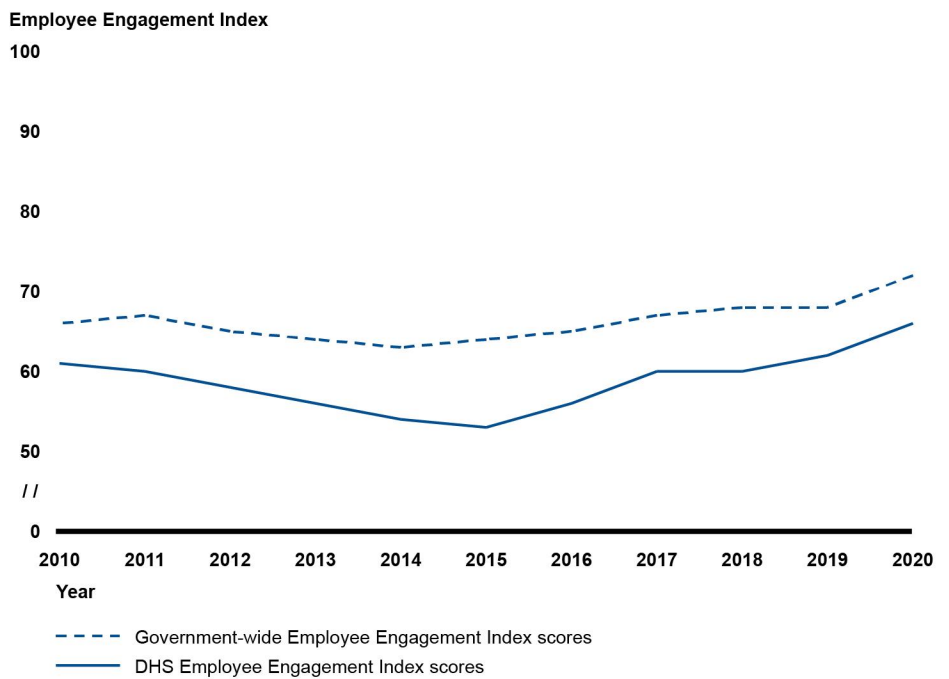
- **Human capital management.** Since our March 2021 High-Risk report, DHS has fully addressed an outcome related to its employee engagement scores on OPM’s Federal Employee Viewpoint Survey. DHS has made continued improvements in its Employee Engagement Index, which OPM calculates from the Federal Employee Viewpoint Survey. Starting in 2015, DHS reversed a 5-year downward trend in

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<sup>13</sup>An unmodified opinion, sometimes referred to as a clean opinion, is expressed when the auditor concludes that management has presented financial statements fairly and in accordance with generally accepted accounting principles.

its scores on the Employee Engagement Index. After 4 consecutive years of improvements, DHS surpassed its 2010 benchmark in 2019, and its Employee Engagement Index in 2020 was the second consecutive year above the 2010 benchmark (see fig. 2).

**Figure 2: Department of Homeland Security (DHS) Employee Engagement Index Scores 2010–2020**



GAO analysis of Federal Employee Viewpoint Survey data. | GAO-21-105418

**Data table for Figure 2: Department of Homeland Security (DHS) Employee Engagement Index Scores 2010–2020**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020
Government-wide	66	67	65	64	63	64	65	67	68	68	72
DHS	61	60	58	56	54	53	56	60	60	62	66

Source: GAO analysis of Federal Employee Viewpoint Survey data. | GAO-21-105418

To address the remaining human capital management outcome, DHS must complete steps to use department-wide training data to inform its human capital programs. DHS anticipates completing action on this outcome in fall 2021.

- **Management integration.** Since 2019, DHS has communicated management priorities through the department planning,

programming, budgeting, and execution process. Specifically, in fiscal year 2019, the Deputy Under Secretary for Management issued strategic guidance to components encouraging investment in areas critical to DHS management functions. To achieve this outcome, DHS must continue to demonstrate sustainable progress integrating its management functions within and across the department, as well as fully address the other 12 outcomes it has not yet fully achieved.

Significant effort is required to build and integrate a department as large and complex as DHS, and continued progress for this high-risk area depends on DHS addressing the remaining management outcomes. Several factors have contributed to DHS's success in narrowing the scope of the high-risk area so far and are helping it to make progress on its remaining challenges. These include top DHS leaders demonstrating leadership commitment and support for addressing the department's challenges; consistently communicating its efforts and regularly seeking feedback from us on its strategy and approach to addressing the high-risk area; establishing an action plan for addressing the high-risk area; and identifying performance measures to monitor its progress. In the coming years, DHS needs to continue implementing the remaining work across its key management functions and sustaining its progress to-date. We will continue to monitor DHS's efforts in this high-risk area to determine if the outcomes are achieved and sustained over the long term.

Chairman Correa, Ranking Member Meijer, and Members of the Subcommittee, this completes my prepared statement. I would be happy to respond to any questions you may have at this time.

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## GAO Contacts and Staff Acknowledgments

If you or your staff members have any questions about this testimony, please contact me at (404) 679-1875 or [curriec@gao.gov](mailto:curriec@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. Other individuals making key contributions to this work include Alana Finley, Assistant Director; Charlotte Gamble, Analyst-in-Charge; Michele Fejfar; Alexandra Gebhard, Marie Mak, and Jan Montgomery. Key contributors for the previous work that this statement is based on are listed in each product.

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U.S. Government Accountability Office, 441 G Street NW, Room 7149  
Washington, DC 20548

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## Strategic Planning and External Liaison

Stephen J. Sanford, Managing Director, [spel@gao.gov](mailto:spel@gao.gov), (202) 512-4707  
U.S. Government Accountability Office, 441 G Street NW, Room 7814,  
Washington, DC 20548



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