



441 G St. N.W.
Washington, DC 20548

Comptroller General
of the United States

Accessible Version

June 23, 2023

The Honorable Alejandro Mayorkas

Secretary of Homeland Security

Washington, D.C. 20528

Priority Open Recommendations: Department of Homeland Security

Dear Secretary Mayorkas:

The purpose of this letter is to update you on the overall status of the Department of Homeland Security’s (DHS) implementation of our recommendations and to call your continued personal attention to areas where open recommendations should be given high priority.¹ In November 2022, we reported that, government-wide, 77 percent of our recommendations made 4 years ago were implemented.² DHS’s recommendation implementation rate was 85 percent. As of June 2023, DHS had 464 open recommendations. Fully implementing these open recommendations could significantly improve agency operations.

Since our July 2022 letter, DHS has implemented 14 of our 46 open priority recommendations.

- The Federal Emergency Management Agency (FEMA) is considering actions to better align the National Flood Insurance Program (NFIP) minimum standards with its current understanding of flood risk, premium rates, and risk reduction approaches to make communities more resilient to increased flooding, as we recommended.³ Because FEMA is considering such amendments to reflect its current understanding of flood risk and to improve communities’ resilience to increased flooding—it met the intent of our 2014 recommendation. Monitoring FEMA’s actions to improve the long-term resilience of federally insured structures will remain a focus of our ongoing and future work. Updating the NFIP standards to promote risk reduction and resilience to increased flooding could help reduce the federal government’s fiscal exposure to climate change.

¹Priority recommendations are those that we believe 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, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

²GAO, *Performance and Accountability Report: Fiscal Year 2022*, [GAO-23-900398](#) (Washington, D.C.: Nov. 15, 2022).

³GAO, *Climate Change: Better Management of Exposure to Potential Future Losses Is Needed for Federal Flood and Crop Insurance*, [GAO-15-28](#) (Washington, D.C.: Oct. 29, 2014).

- FEMA developed a plan to address identified challenges that have hindered its ability to provide reliable and complete information to field leaders and managers about staff knowledge, skills, and abilities, as we previously reported.⁴ Such actions could better enable the agency to use its disaster workforce as flexibly and effectively as possible to meet mission needs in the field.
- FEMA took steps to provide additional information to disaster assistance applicants about how FEMA determined their eligibility for assistance and the amount of assistance to award, as we recommended.⁵ Specifically, FEMA expanded on the letter it sends to applicants after they apply for assistance. For example, the updated letters may include (1) a computer print-out of FEMA's Housing Inspection Report; (2) documents related to the application (for example, receipts submitted, proof of property ownership); (3) FEMA letters previously sent to the applicant; and (4) FEMA staff contact records (e.g., FEMA's records of conversations with the applicant, their landlord, their employer, or representatives of their insurance companies or banks). As a result, disaster assistance applicants have more information regarding their eligibility and award amounts.
- DHS took steps to improve the management of untimely antidumping and countervailing duty liquidations.⁶ As a result of addressing our recommendation, U.S. Customs and Border Protection (CBP) now regularly collects and analyzes data on untimely liquidations to identify their causes. In addition, CBP has improved its ability to assess the revenue effect of untimely liquidations.
- DHS, in coordination with the Department of Health and Human Services (HHS), clearly defined roles and responsibilities for agencies involved in the referral and placement of unaccompanied children—noncitizen children who have no lawful immigration status and no parents or guardians in the U.S.—from DHS to HHS-funded shelters, as we recommended. By taking this action, DHS and HHS are more effectively able to track the children and communicate about their transfer to HHS custody.⁷
- DHS developed and implemented oversight mechanisms for CBP's implementation of policies and procedures relating to medical care for individuals in its custody.⁸ As of March 2023, CBP had developed and implemented a medical quality management program for its medical support contract in facilities along the southwest border. Additionally, CBP has developed and implemented a protocol for conducting management inspections of medical care at CBP facilities. Taking the actions we

⁴GAO, *FEMA Disaster Workforce: Actions Needed to Address Deployment and Staff Development Challenges*, [GAO-20-360](#) (Washington, D.C.: May 4, 2020).

⁵GAO, *Disaster Assistance: Additional Actions Needed to Strengthen FEMA's Individuals and Households Program*, [GAO-20-503](#) (Washington, D.C.: Sept. 30, 2020).

⁶GAO, *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).

⁷GAO, *Unaccompanied Alien Children: Actions Needed to Ensure Children Receive Required Care in DHS Custody*, [GAO-15-521](#) (Washington, D.C.: July 14, 2015).

⁸GAO, *Southwest Border: CBP Needs to Increase Oversight of Funds, Medical Care, and Reporting of Deaths*, [GAO-20-536](#) (Washington, D.C.: July 14, 2020).

recommended will help provide DHS assurance that CBP's efforts to enhance medical care to individuals in custody are implemented as intended.

- DHS and the General Services Administration (GSA) completed a needs assessment, gap analysis, and analysis of alternatives for leasing and construction alternatives for DHS component agencies to inform DHS's National Capital Region Real Property Strategy, as we recommended.⁹ As a result of these analyses, the agencies are better positioned to demonstrate the justification for the remaining planned construction in the DHS headquarters consolidation project.
- The U.S. Coast Guard incorporated its process for analyzing the need for boat stations into its annual budget planning process, as we recommended.¹⁰ The analysis process includes issuing Federal Register notices regarding potential closures and including details of closures to be carried out and efficiencies associated with these closures. Following this process better positions the Coast Guard to close remaining boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative.
- DHS took steps to improve coordination between its enterprise risk management (ERM) and cybersecurity functions, as we recommended.¹¹ DHS established an ERM steering committee, which includes senior representation from the DHS Chief Information Officer—the department's cybersecurity risk executive. By taking these steps, DHS is better positioned to ensure that senior leadership responsible for ERM are aware of significant cybersecurity risks and can address them in the context of other risks and their potential impacts on the agency's mission.
- In September 2022, DHS demonstrated that it is collecting monthly data on its Agile core metrics through its Investment Evaluation Submission and Tracking system, had established targets for those metrics, and is continuing to map the metrics to DHS's desired outcomes.¹² Taking these actions we recommended will help DHS better measure results associated with its transition to Agile.
- DHS's Office of the Chief Information Officer finalized an updated TechStat process guide in June 2022, which describes specific activities and methods for meeting the Office of Management and Budget TechStat review requirements.¹³ Taking these actions

⁹GAO, *Federal Real Property: DHS and GSA Need to Strengthen the Management of DHS Headquarters Consolidation*, [GAO-14-648](#) (Washington, D.C.: Sept. 19, 2014). In June 2022, we briefed congressional committees about the DHS headquarters consolidation. In our briefing, we reported that GSA and DHS conducted cost and benefit analyses in accordance with OMB guidance (see GAO, *DHS Headquarters Consolidation: Project Cost and Schedule Estimates Are Not Finalized*, [GAO-22-105970](#), Washington, D.C.: Aug. 30, 2022).

¹⁰GAO, *Coast Guard: Actions Needed to Close Stations Identified as Overlapping and Unnecessarily Duplicative*, [GAO-18-9](#) (Washington, D.C.: October 26, 2017).

¹¹GAO, *Cybersecurity: Agencies Need to Fully Establish Risk Management Programs and Address Challenges*, [GAO-19-384](#) (Washington, D.C.: July 25, 2019).

¹²GAO, *Agile Software Development: DHS Has Made Significant Progress in Implementing Leading Practices, but Needs to Take Additional Actions*, [GAO-20-213](#) (Washington, D.C.: June 1, 2020).

¹³GAO, *Homeland Security: DHS Needs to Fully Implement Key Practices in Acquiring Biometric Identity Management System*, [GAO-21-386](#) (Washington, D.C.: June 8, 2021).

we recommended, other departmental Information Technology (IT) programs that are deemed high risk will be more readily aware of specific process requirements that should be followed when undergoing a TechStat review.

- As we recommended, DHS's Office of Biometric Identity Management established a process to help ensure bidirectional traceability of requirements for the Homeland Advanced Recognition Technology program.¹⁴ As of January 2023, the office had demonstrated that it had implemented this process and was maintaining improved traceability between higher-level and lower-level system requirements. As a result, the program is better positioned to develop a system that meets customer needs.
- As we recommended, DHS's Cybersecurity and Infrastructure Security Agency (CISA) updated its plans for completing its organizational transformation initiative.¹⁵ Specifically, as of May 2023, CISA had established expected completion dates for the remaining phase three tasks and established an overall deadline for the transformation initiative, addressing two of our recommendations. By taking these steps, CISA will be better positioned to complete its organizational transformation without additional delays, enhancing its mission effectiveness.

DHS has 32 priority recommendations remaining from those we identified in the 2022 letter. We ask for your continued attention to the remaining priority recommendations. We are adding 10 new recommendations. These recommendations are related to FEMA's management of disaster recovery programs, DHS's privacy program leadership, Coast Guard's IT Program implementation, the Cybersecurity and Infrastructure Security Agency's (CISA) assessment of the need for a federal insurance response to cyberattacks on the nation's critical infrastructure, and domestic intelligence and information sharing. These recommendations bring the total number of priority recommendations to 42. (See the enclosure for the list of recommendations and actions needed to implement them.)

The 42 priority recommendations fall into the following eight major areas:

Emergency Preparedness and Response.

- Disasters affect numerous American communities and cause billions of dollars of damage. FEMA plays a key role in preparing local communities for emergencies, rapidly responding during crises, and supporting recovery. FEMA should implement 11 priority recommendations in this area, including identifying ways to better manage fragmentation across federal disaster recovery programs, taking steps needed to identify and address barriers to and disparate outcomes from disaster programs, and implementing a methodology to more comprehensively assess a jurisdiction's capability to respond to a disaster without federal assistance. By implementing these recommendations, FEMA could more effectively manage the federal response to disasters and limit the federal government's fiscal exposure.

¹⁴[GAO-21-386](#).

¹⁵GAO, *Cybersecurity and Infrastructure Security Agency: Actions Needed to Ensure Organizational Changes Result in More Effective Cybersecurity for Our Nation*, [GAO-21-236](#) (Washington, D.C.: March 10, 2021).

Border Security.

- DHS is responsible for securing the nation's borders, while also facilitating lawful trade, travel, and immigration. In this role, DHS is charged with, among other things, ensuring the detection and interdiction of persons unlawfully entering the U.S., and protecting U.S. trade revenue. DHS should fully implement eight priority recommendations in this area, including (1) addressing information sharing gaps, such as details of any family separation, so HHS can better make decisions for unaccompanied children; (2) better articulating a commonly agreed to outcome for Department of Defense support to DHS's southwest border security mission; and (3) helping CBP protect U.S. trade revenue from certain improper payments. In doing so, DHS can help support informed and timely decisions about children's care. In addition, DHS could improve risk management in its collection and refund of duties and enhance coordination of interagency efforts to support DHS's border security mission.

Transportation Security.

- More than 2.7 million miles of critical pipeline infrastructure transport and distribute oil, natural gas, and other hazardous products throughout the U.S. Interstate pipelines run through remote areas and highly populated urban areas, and are vulnerable to accidents, operating errors, and malicious physical and cyber-based attack or intrusion. The Transportation Security Administration (TSA) is primarily responsible for overseeing pipeline physical security and cybersecurity. By implementing two priority recommendations in this area that will improve TSA's risk analysis—enhancing data sources used in risk analysis and completing a peer review of its risk modeling—TSA will increase assurance that the agency accurately and comprehensively ranks relative risk among pipeline systems.

Infrastructure and Management.

- DHS is the third-largest cabinet-level department in the federal government, overseeing tens of billions of dollars in annual budgetary resources, and employing more than 240,000 staff in a broad range of jobs. These jobs include countering terrorism and homeland security threats, providing aviation and border security, emergency response, cybersecurity, and critical infrastructure protection. DHS should fully implement seven priority recommendations in this area, including (1) employing models for the U.S. Coast Guard's asset lines for predicting the outcome of investments and analyzing trade-offs, and optimizing decisions among competing investments and (2) using a balanced set of performance metrics to manage the department's procurement organizations. In implementing these recommendations, DHS could ensure its infrastructure, assets, workforce, and procurement organizations are effectively managed to accomplish DHS's wide range of missions.

Information Technology and Cybersecurity.

- DHS and its components invest billions of dollars each year to acquire IT and other capabilities to support the department's functions. Many of DHS's major IT acquisition programs have taken longer than expected to develop or have failed to deliver the desired value.
- DHS should fully implement GAO's six priority recommendations in this area, including

(1) implementing leading practices for network capacity planning for the U.S. Coast Guard; (2) ensuring the biometric identity management system modernization program (referred to as the Homeland Advanced Recognition Technology program) tracks and monitors all of its costs; and (3) fully defining the role of the senior agency official for privacy in reviewing key privacy protections for systems with personal information. Implementing these priority recommendations would help to, among other things, (1) better position the Coast Guard to mitigate risks resulting from inefficiencies and disruptions in network availability for its users, (2) limit further schedule delays and cost overruns for modernizing DHS's 29-year-old legacy biometric identity management system, and (3) help the department ensure that privacy protections are consistently incorporated into systems with personally identifiable information.

Chemical Security.

- Thousands of high-risk chemical facilities, comprising key U.S. critical infrastructure, may be subject to the risk posed by cyber threat adversaries—terrorists, criminals, or nations. These adversaries could potentially manipulate facilities' information and control systems to release or steal hazardous chemicals and inflict mass casualties to surrounding populations. CISA, within DHS, evaluates high-risk chemical facilities' cybersecurity efforts via inspections that include reviewing policies and procedures, interviewing relevant officials, and verifying facilities' implementation of agreed-upon security measures. By implementing one priority recommendation in this area—developing a workforce plan that addresses cybersecurity-related needs—CISA could ensure that it has the appropriate number of staff to carry out its chemical program's cybersecurity-related efforts.

Countering Violent Extremism.

- Violent extremism—generally defined as planning or committing violent acts to achieve political, ideological, religious, or social goals—has been perpetrated and promoted by a broad range of individuals and groups. Violent extremists continue to be a threat to the homeland. DHS tracked a total of 231 domestic terrorism incidents from 2010 to 2021, resulting in 145 deaths in the U.S. Further, according to our analysis of FBI data, the number of FBI's open domestic terrorism-related cases grew by 357 percent from 1,981 to 9,049 (from 2013 to 2021).
- By implementing the three priority recommendations, DHS can have a more comprehensive approach to countering violent extremism domestically. For instance, DHS should revise or supplement its Countering Terrorism and Targeted Violence strategy to include key elements of a comprehensive strategy relating to identifying (1) resources and investments and (2) key external factors that could affect goals. It should also take steps to close the gaps on those elements that are partially included in the strategy related to problem definition, scope, and methodology; activities, milestones, and performance measures; and organizational roles, responsibilities, and coordination. DHS should also establish common terminology for targeted violence, and incorporate its targeted violence and terrorism prevention mission into its departmental governance of data.

Domestic Intelligence and Information Sharing.

- In the weeks preceding January 6, 2021, DHS was among several federal, state, and local entities responsible for identifying and sharing information or coordinating security measures to protect the U.S. Capitol. However, DHS did not consider whether the context of the events and surrounding circumstances affected the designation of the events as a National Special Security Event, which can provide additional security measures. Further, DHS did not process or share all threat-related information with relevant agencies. GAO's four priority recommendations related to domestic intelligence and information sharing ask DHS to, among other things, clarify policies regarding what factors merit and who can request National Special Security Event designation, and to assess controls in place for ensuring personnel follow existing and updated policies for assessing and sharing threat information.

Implementing these priority recommendations can help ensure that DHS's process to designate special security events is responsive to changing threats, and understood by relevant agencies. In addition, they will help ensure that DHS personnel consistently follow policies for developing and sharing threat products so that the agency's partners have the best assistance and information available to respond to threats.

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In April 2023, we issued our biennial update to our [High Risk List](#). This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges.¹⁶ One of our high-risk areas, [Strengthening Department of Homeland Security IT and Financial Management Functions](#), centers directly on DHS. Another high-risk area is related to FEMA's management of the [National Flood Insurance Program](#).

Several other government-wide high-risk areas also have direct implications for DHS and its operations. These include (1) [improving the management of IT acquisitions and operations](#), (2) [improving strategic human capital management](#), (3) [managing federal real property](#), (4) [ensuring the cybersecurity of the nation](#),¹⁷ and (5) [managing the government-wide personnel security clearance process](#).

We urge your attention to the 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 (OMB), and the leadership and staff in agencies, including within DHS. In March 2022, we issued a report on key practices to successfully

¹⁶GAO, *High-Risk Series: Efforts Made to Achieve Progress Need to be Maintained and Expanded to Fully Address All Areas*, [GAO-23-106203](#) (Washington, D.C.: Apr. 20, 2023).

¹⁷With 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).

address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹⁸

In addition to your continued attention on these issues, Congress plays a key role in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.¹⁹

There are various strategies Congress can use in addressing our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on DHS's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress could follow up during the appropriations process and request periodic updates. Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress could pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

Copies of this report are being sent to the Director of OMB and the appropriate congressional committees. In addition, the report will be available on our 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 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 464 open recommendations, as well as those additional recommendations in the high-risk areas for which DHS has a leading role. Thank you for your attention to these matters.

Sincerely yours,

A handwritten signature in black ink, reading "Gene L. Dodaro". The signature is written in a cursive style with a large, prominent "D" at the beginning.

¹⁸GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](https://www.gao.gov/products/GAO-22-105184) (Washington, D.C.: Mar. 3, 2022).

¹⁹James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

Gene L. Dodaro
Comptroller General of
the United States

Enclosure

cc: John K. Tien, Deputy Secretary

Randolph D. "Tex" Alles, Senior Official Performing the Duties of the Under Secretary for Management

Deanne Criswell, Administrator, Federal Emergency Management Agency (FEMA)

Michael Grimm, Deputy Associate Administrator (Acting), Federal Insurance and Mitigation Administration, FEMA

Troy Miller, Commissioner (Acting), U.S. Customs and Border Protection

Ur Mendoza Jaddou, Director, U.S. Citizenship and Immigration Services

Raul L. Ortiz, Chief, United States Border Patrol

David Pekoske, Administrator, Transportation Security Administration

Admiral Linda L. Fagan, Commandant of the Coast Guard, U.S. Coast Guard

Roland Edwards, Chief Human Capital Officer, Office of the Chief Human Capital Officer

Jen Easterly, Director, Cybersecurity and Infrastructure Security Agency (CISA)

Eric Hysen, Senior Official Performing the Duties of the Deputy Under Secretary for Management

Bill Pratt, Director, Strategic Technology Management, Chief Technology Officer Directorate, OCIO

Mike Horton, Chief Data Officer

Shonnie Lyon, Director, Office of Biometric Identity Management

Paul Courtney, Chief Procurement Officer

Gary Rasicot, Acting Assistant Secretary, Countering Weapons of Mass Destruction Office

Dr. David Mussington, Executive Assistant Director for Infrastructure Security, CISA

Robert Silvers, Under Secretary, Office of Strategy, Policy, and Plans

Monte Hawkins, Assistant Secretary for Counterterrorism and Threat Prevention (Acting)

The Honorable Shalanda Young, Director, Office of Management and Budget

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

Emergency Preparedness and Response

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

Year Recommendation Made: 2009

Recommendation: To provide transparency and accountability over payments the Federal Emergency Management Agency (FEMA) makes to Write Your Own (WYO) companies 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 concurs with this recommendation.

Subsequent to issuing our report Congress passed the Biggert-Waters Flood Insurance Reform Act of 2012. The act required that FEMA develop a methodology for determining the amount to pay insurers using actual expense data and issue a rule to formulate revised expense reimbursements to be structured to track insurers' actual flood-related expenses as practicably possible.²⁰ FEMA's Expense Analysis Working Group drafted a procedures manual for determining WYO profit margins that FEMA officials approved in August 2022. The manual is being tested internally using WYO and insurance industry calendar year 2021 financial data from the National Association of Insurance Commissioners (NAIC).

FEMA expects to complete its testing, analyze the results, obtain WYO responses to its inquiries, inform NAIC of unresolved issues, and prepare individual WYO profit/loss reports before the end of fiscal year 2023. To close this recommendation, FEMA needs to complete this work and provide us the supporting documentation to review the steps taken. Finalizing these processes and annually comparing FEMA payments and WYO insurers' actual flood insurance expenses will provide greater transparency and accountability over the amount of estimated profit included in these payments.

High Risk Area: [National Flood Insurance Program](#)

Director: Alicia Puente Cackley, Financial Markets and Community Investment

Contact information: 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.

Year Recommendation Made: 2012

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

²⁰Pub. L. No. 112-141, div. F, title II, § 100224(b)-(e), 126 Stat. 936, 937.

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 concurred with this recommendation. FEMA has taken actions to update its methodology to provide a more comprehensive assessment of a jurisdiction's capability to respond to and recover from a disaster without federal assistance. In particular, FEMA has taken steps to update the factors considered when evaluating a request for a major disaster declaration for Public Assistance. Specifically, FEMA proposed updating the estimated cost of assistance (i.e., the per capita indicator) three times (in 2016, 2017, and 2020), via the federal rulemaking process.

However, as of March 2023, the agency has not issued a final rule updating the estimated cost of assistance nor does it intend to take additional actions to implement our recommendation. Until FEMA fully implements a new methodology, the agency will not have an accurate assessment of a jurisdiction's capabilities to respond to and recover from a disaster without federal assistance and runs the risk of recommending that the President award Public Assistance to jurisdictions that have the capability to respond and recover on their own.

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

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

FEMA Disaster Workforce: Actions Needed to Address Deployment and Staff Development Challenges. GAO-20-360. Washington, D.C.: May 4, 2020.

Year Recommendation Made: 2020

Recommendation: The FEMA Administrator should develop mechanisms, including collecting relevant data, to assess how effectively FEMA's disaster workforce was deployed to meet mission needs in the field.

Action Needed: FEMA concurred with this recommendation. As of January 2023, FEMA officials stated that field leadership is responsible for reviewing staffing plans and determining resource needs during disasters, and coordinating requirements with the Field Operations Directorate, which oversees the deployment of FEMA's disaster workforce. In addition, FEMA provided a high-level analysis of the percentage of staffing requests that were met from 2018 through 2020. While this is a positive step, officials have indicated that the agency does not plan to conduct such assessments on an ongoing basis or at a more granular level (e.g., by year, disaster, cadre, position) which would help inform future deployment decisions.

To fully implement this recommendation, FEMA needs to develop mechanisms that can be used on an ongoing basis to collect and analyze relevant data that would allow the agency to assess the extent to which its deployment processes and decisions (e.g., number and timing of deployments) met field needs during disasters. Establishing these mechanisms would provide FEMA headquarters officials with critical information to assess whether its deployment strategies effectively placed staff with the right skills in the right place at the right time to meet mission needs, and to take corrective actions, if necessary.

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

COVID-19: Federal Efforts Could Be Strengthened by Timely and Concerted Actions.
GAO-20-701. Washington, D.C.: September 21, 2020.

Year Recommendation Made: 2020

Recommendation: The Administrator of the Federal Emergency Management Agency—one of the agencies leading the COVID-19 response through the Unified Coordination Group—consistent with its roles and responsibilities, should work with relevant federal, state, territorial, and tribal stakeholders to devise interim solutions, such as systems and guidance and dissemination of best practices, to help states enhance their ability to track the status of supply requests and plan for supply needs for the remainder of the COVID-19 pandemic response.

Action Needed: In September 2020, DHS disagreed with this recommendation, noting, among other things, the work that FEMA had done to manage the medical supply chain and increase supply availability. We note that we made this recommendation to both DHS and HHS with the intent that they would work together under the Unified Coordination Group to address challenges reported by state officials with both public health and emergency management responsibilities. Moreover, we recommended they take actions that were consistent with the roles and responsibilities that were to be more clearly defined, as HHS took a more central role in leading supply distribution.

Although FEMA disagreed with our recommendation, it began taking some action in March 2021 within its purview. For instance, FEMA developed and released an updated distribution management plan guide that, according to FEMA, provides actionable guidance for state, local, tribal, and territorial agencies, among others, to effectively and efficiently distribute critical resources to disaster survivors in the community. Further, in December 2022, FEMA developed a draft of the National Framework for Allocation of Constrained Public Health Resources. The framework establishes a methodology by which federal departments, agencies, and interagency groups may create processes to address constrained federal public health and medical resources when a public health incident arises or if public health and medical resources are constrained. As of April 2023, according to FEMA officials, the framework remains under review at the White House. Once finalized, publically issued, and implemented, the framework should help states, tribes, and territories on the front lines of the whole-of-nation disaster response ensure they have the support they need to track, manage, and plan for supplies.

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

National Flood Insurance Program: Congress Should Consider Updating the Mandatory Purchase Requirement. [GAO-21-578](#). Washington, D.C.: July 30, 2021.

Year Recommendation Made: 2021

Recommendation: The Deputy Associate Administrator of FEMA's Federal Insurance and Mitigation Administration should determine what information is available—both internally and externally—related to the mandatory purchase requirement, and use it to develop strategies for increasing consumer participation in the flood insurance market.

Action Needed: DHS agreed with this recommendation. DHS outlined its plan to determine available information both internally and externally that could be used to develop strategies for increasing consumer participation in the flood insurance market. More specifically, DHS plans to continue its review of internal available data and external research conducted by agencies and researchers.

As of November 2022, DHS completed its review of internal available data and existing research conducted by agencies and researchers to help develop strategies for increasing consumer participation in the flood insurance market. DHS officials told us it was conducting a policy and legal analysis for communicating with potential policyholders who have received prior individual assistance and are subject to the Mandatory Purchase Requirement. The officials said they expected to complete this analysis in June 2023, and that they plan to conduct outreach to individuals and households, as appropriate, with an estimated completion date of December 2023.

To fully implement this recommendation, DHS will need to follow through on its efforts to collect information, both internally and externally, and develop strategies for increasing consumer participation. By doing so, FEMA may be able to better target its outreach to communities, lenders, property owners, and other stakeholders to improve compliance with the requirement.

Recommendation: The Deputy Associate Administrator of FEMA's Federal Insurance and Mitigation Administration should evaluate and report to Congress with recommendations on how comprehensive and up-to-date flood risk information could be used to determine which properties should be subject to the mandatory purchase requirement.

Action Needed: DHS agreed with the recommendation. DHS outlined plans to assess data and make it available to policyholders and others regarding flood risk. In May 2022, DHS developed potential legislative proposals that included suggested changes to simplify and clarify FEMA's mapping authority. The suggested changes also would provide flexibility for FEMA to produce regulatory maps and non-regulatory flood hazard and flood risk information products to enhance the understanding of flood risk. As of November 2022, DHS officials told us they completed an analysis comparing flood insurance premiums to the latest flood risk information for specific geographies and plan to brief FEMA leadership on their findings and recommendations on which flood risk datasets may inform the mandatory purchase requirement. DHS plans to report to Congress on its evaluation of flood risk data and recommend possible uses of flood risk information to inform mandatory purchase requirements, with an estimated completion date of December 2023.

To fully implement this recommendation, DHS will need to follow through on these efforts to evaluate how comprehensive and up-to-date flood risk information could be used to determine which properties should be subject to the mandatory purchase requirement. By conducting this

analysis, FEMA could help Congress in deciding whether to (1) revise the mandatory purchase requirement, (2) improve the ability of the requirement to increase consumer participation and (3) reduce future federal disaster assistance expenditures. Each of these goals will continue to be important as flood risk is expected to increase in the future.

High Risk Area: [National Flood Insurance Program](#)

Director: Alicia Puente Cackley, Financial Markets and Community Investment

Contact information: CackleyA@gao.gov, (202) 512-8678

Disaster Assistance: FEMA Should Take Additional Actions to Strengthen Fraud Risk Management for Public Assistance Emergency Work Grants. [GAO-20-604](#). Washington, D.C.: September 29, 2020.

Year Recommendation Made: 2020

Recommendation: The Administrator of FEMA should designate one entity as the lead entity with responsibility for providing oversight of agency-wide efforts to manage fraud risks to Public Assistance (PA) emergency work grants, including managing the fraud risk assessment process, consistent with leading practices.

Action Needed: DHS concurred with this recommendation. However, in its comments on our draft report, DHS noted that FEMA takes a multi-directorate approach to proactively address fraud risk within the PA program. Specifically, DHS noted that different FEMA entities have fraud-related responsibilities and that FEMA believes combining these functions into one office would potentially cause conflicts of interest. In March 2022, we reiterated the leading practices from the Fraud Risk Framework regarding the designation of an antifraud entity to provide oversight of efforts to manage fraud risks. As of May 2023, FEMA has not designated an antifraud entity to oversee its fraud risk management efforts but is planning to meet with GAO to discuss what GAO's Fraud Risk Framework calls for in a centralized oversight function.²¹

To fully implement this recommendation, FEMA needs to designate one lead entity with responsibility for providing oversight of agency-wide efforts to manage fraud risks. Doing so can help ensure FEMA identifies and assesses fraud risks to PA emergency work grants. As a result, FEMA would be better positioned to develop reasonable, cost-effective measures to reduce fraud risks to acceptable levels.

Director: Rebecca Shea, Director, Forensic Audits and Investigative Service

Contact information: SheaR@gao.gov, (202) 512-6722

Disaster Recovery: Actions Needed to Improve the Federal Approach. [GAO-23-104956](#). Washington, D.C.: November 15, 2022.

Year Recommendation Made: 2023

²¹GAO, *A Framework for Managing Fraud Risks in Federal Programs*, [GAO-15-593SP](#) (Washington, D.C.: July 28, 2015).

Recommendation: The FEMA Administrator should, in consultation with the Recovery Support Function Leadership Group, identify and take steps to better manage fragmentation between its disaster recovery programs and other federal programs, including consideration of the options identified in this report. If FEMA determines that it needs authority for actions that it seeks to implement, it should request that authority from Congress.

Action Needed: DHS agreed with this recommendation. In May 2023, DHS officials told us that, since late 2022, the National Security Council has convened senior leaders from across the federal government, including representatives from FEMA, to participate in an Interagency Policy Committee. The Interagency Policy Committee considers the options we identified for improving disaster recovery. As this committee continues its work to better align long-term recovery efforts, FEMA paused its planned update of the National Disaster Recovery Framework. FEMA is also working with the Small Business Administration, the Office of Management and Budget, and other federal partners to develop an implementation plan for a single disaster assistance application by the end of calendar year 2023.

To fully implement this recommendation, FEMA will need to identify and take steps to manage fragmentation between its disaster recovery program and other federal programs, including those at the Departments of Transportation and Housing and Urban Development. Doing so could improve disaster recovery programs' service delivery to disaster survivors and communities and improve the effectiveness of federal recovery efforts.

Recommendation: The FEMA Administrator should identify and take steps to better manage fragmentation across its disaster recovery programs, including consideration of the options identified in this report. If FEMA determines that it needs authority for actions that it seeks to implement, it should request that authority from Congress.

Action Needed: DHS agreed with this recommendation. In May 2023, DHS officials told us FEMA had taken some steps to simplify its Individual Assistance and Public Assistance processes and address equity concerns for vulnerable communities. For example, FEMA planned to stand up Public Assistance Navigator Teams to provide in-person technical assistance targeted for lower capacity applicants, such as those in rural areas or with less disaster recovery experience. FEMA officials told us they expect to fully implement this recommendation by December 2023. To do so, FEMA needs to identify and take steps to manage fragmentation across its disaster recovery programs. Doing so could improve disaster recovery programs' service delivery to disaster survivors and communities and improve the effectiveness of federal recovery efforts.

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

Disaster Recovery: Additional Actions Needed to Identify and Address Potential Recovery Barriers. GAO-22-104039. Washington, D.C.: December 15, 2021.

Year Recommendation Made: 2022

Recommendation: The FEMA Administrator should, in coordination with the SBA Associate Administrator of the Office of Disaster Assistance and the HUD Assistant Secretary for Community Planning and Development, develop, with input from key recovery partners, and implement an interagency plan to help ensure the availability and use of quality information that

includes (1) information requirements, (2) data sources and methods, and (3) strategies for overcoming information challenges—to support federal agencies involved in disaster recovery in identifying access barriers or disparate outcomes.

Action Needed: DHS agreed with this recommendation and in February 2023, FEMA officials told us about several efforts planned or underway to improve their information about access barriers or disparate outcomes. According to FEMA officials, the agency now conducts equity analyses to determine whether support from the Individual Assistance and Public Assistance programs varies by demographics. FEMA officials told us these analyses allow them to view both applications to these assistance programs and outcomes by community level data, such as the Centers for Disease Control and Prevention Social Vulnerability Index. The results of this analysis are now displayed in an equity dashboard. FEMA officials told us that they share these analyses with the U.S. Department of Housing and Urban Development (HUD) and the Small Business Administration (SBA) to help those agencies design and develop their own equity tools. FEMA officials told us that as they begin collecting individual applicants' demographic data, they will add them to the dashboards. Further, FEMA officials told us that they planned to revise their data sharing agreements with SBA and HUD by late 2023.

These and other efforts FEMA has underway may improve FEMA's information about program access barriers or disparate outcomes. However, to address the recommendation and ensure the availability and use of quality information needed to identify access barriers and disparate outcomes, FEMA (together with HUD and SBA) will need to develop and implement a documented, interagency plan that specifies the data needed, the sources of those data, and the methods for obtaining those data. Working together on an interagency plan gives federal agencies with large recovery programs the opportunity to ensure equal opportunity to participate in disaster recovery in a meaningful way.

Recommendation: The FEMA Administrator should coordinate with the SBA Associate Administrator of the Office of Disaster Assistance and the HUD Assistant Secretary for Community Planning and Development to design and establish routine processes to be used within and across federal disaster recovery programs to address identified access barriers and disparate outcomes on an ongoing basis.

Action Needed: DHS agreed with this recommendation and in February 2023, FEMA officials told us they have taken some steps toward addressing it. Specifically, officials told us that FEMA's Community Assistance Recovery Support Function manages a community analysis tool designed to help FEMA work with local communities and tribal nations to achieve desired recovery outcomes. More specifically, FEMA uses pre-disaster condition information after a disaster to better understand what assistance FEMA can provide and which communities need assistance the most. FEMA officials also told us that they plan to use existing interagency coordination processes, such as the Recovery Support Function Leadership Group, to share the results of these analyses.

To fully implement this recommendation, FEMA must design and institutionalize routine processes to be used within and across federal recovery programs to address identified access barriers and disparate outcomes on an ongoing basis. Without routine processes, disaster recovery programs lack a mechanism to ensure they can address any potential access barriers or disparate outcomes they might identify, particularly if the cause of those barriers or outcomes arise from the interaction between or among programs.

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

Border Security

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.

Year Recommendation Made: 2016

Recommendation: To improve risk management in the collection of Antidumping and Countervailing (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: DHS concurred with this recommendation. As of March 2023, CBP has issued guidance for determining when to use a single transaction bond (STB) for AD/CV entries. CBP also issued guidance to revoke CBP officials' authority to allow importers that it suspended or debarred to use a continuous entry bond, except when this bond is the only type acceptable. CBP is in the process of updating its monetary guidelines for setting bond amounts. Additionally, CBP officials said they are in the process of (1) updating their electronic bond regulation to formally allow the use of such a bond and (2) automating their bond sufficiency checks. According to CBP officials, the agency plans to complete initiatives to update bond guidelines and fully automate bond sufficiency checks by the September 2023. The initiatives CBP has taken and plans to take could help CBP mitigate the risk of AD/CV duty nonpayment but the extent to which the initiatives use its data and risk analysis strategically is unclear at this point.

Director: Kimberly M. Gianopoulos, International Affairs and Trade

Contact information: GianopoulosK@gao.gov, (202) 512-8612

Southwest Border: Actions Needed to Improve DHS Processing of Families and Coordination between DHS and HHS. [GAO-20-245](#). Washington, D.C.: February 19, 2020.

Year Recommendation Made: 2020

Recommendation: The Secretary of Homeland Security, jointly with the Secretary of Health and Human Services (HHS), should collaborate to address information sharing gaps identified in this report to ensure that the Office of Refugee Resettlement (ORR) receives information needed to make decisions for unaccompanied alien children (UAC), including those apprehended with an adult.

Action Needed: DHS concurred with this recommendation. In coordination with HHS, DHS implemented its Unified Immigration Portal, which provides real-time data to track unaccompanied children from the time of apprehension to their referral and placement in HHS-funded facilities, including those apprehended with an adult. Additionally, HHS continues to implement its updated data system, which automates the process for referring unaccompanied children from DHS to HHS. However, the information gaps we highlighted in our report continue to exist and as of May 2023, we were awaiting additional information from DHS. In particular,

ORR officials stated they do not consistently receive information from DHS about the adults who arrived with unaccompanied children, which would help ORR make placement and release decisions. Also, DHS officials told us they lacked clarity from ORR on such gaps, including the specific information that ORR needs about family separations.

To fully address the recommendation, DHS and HHS should collaborate to address information sharing gaps identified to ensure that ORR receives information needed to make decisions for unaccompanied children, including those apprehended with an adult. Doing so would enable ORR to make more informed and timely decisions for unaccompanied children, including those separated from adults with whom they were apprehended.

Director: Rebecca S. Gambler, Homeland Security and Justice

Contact information: GamblerR@gao.gov, (202) 512-8777

Southwest Border: Actions Needed to Address Fragmentation in DHS's Processes for Apprehended Family Members. [GAO-20-274](#). Washington, D.C.: February 19, 2020.

Year Recommendation Made: 2020

Recommendation: The Secretary of Homeland Security should identify the information about family members apprehended together that its components collectively need to process those family members and communicate that information to its components.

Action Needed: DHS concurred with this recommendation. According to DHS, in June 2020, DHS's Office of Immigration Statistics launched a Family Status Data Standards Community of Interest (COI), which includes subject matter experts from DHS components and HHS. In November 2021, DHS officials stated that the COI established what information gaps exist and possible solutions to close the gaps, which the Office of Immigration Statistics was to summarize in a report. According to DHS officials, the Office of Immigration Statistics planned to present possible solutions on information gaps and engage with senior leaders. As of May 2023, we were awaiting additional information from DHS regarding these efforts. Identifying and communicating department-wide information needs with respect to family members who have been apprehended together should help provide DHS with greater assurance that its components are identifying all individuals who may be eligible for relief from removal from the U.S. based on their family relationships.

Recommendation: The Secretary of Homeland Security should evaluate options for developing a unique identifier shared across DHS components' data systems to link family members apprehended together.

Action Needed: DHS concurred with this recommendation. In commenting on our draft report, DHS reported that its Office of Immigration Statistics plans to work with relevant components to develop a unique shared identifier linking family members apprehended together. After first developing a standard code to describe family separation reasons, DHS reported that it will prioritize developing common codes to identify family members apprehended together. As of May 2023, we were awaiting additional documentation from DHS regarding these actions. Evaluating options for developing a shared unique family member identifier across components that would allow each component access to certain information about family members apprehended together would help bridge the information gaps about family relationships between components caused by DHS's fragmented data systems.

Director: Rebecca S. Gambler, Homeland Security and Justice

Contact information: GamblerR@gao.gov, (202) 512-8777

Customs and Border Protection: Risk Management for Tariff Refunds Should Be Improved. GAO-20-182. Washington, D.C.: December 17, 2019.

Year Recommendation Made: 2020

Recommendation: The Commissioner of CBP should ensure that the Office of Trade assesses the feasibility of flagging excessive export submissions across multiple claims and takes cost-effective steps, based on the assessment, to prevent over claiming.

Action Needed: CBP concurred with this recommendation. In April 2023, CBP told us it had assessed the feasibility of flagging excessive export submissions and drafted a white paper regarding the assessment. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's white paper, to determine whether CBP has implemented our recommendation. Because claimants could over claim drawback refunds for merchandise that was never exported, having the ability to flag excessive export submissions across multiple claims would enhance CBP's protection against over claiming.²²

Recommendation: The Commissioner of CBP should ensure that the Office of Trade develops a plan, with time frames, to establish a reliable system of record for proof of export.

Action Needed: CBP concurred with this recommendation. According to CBP, the Automated Export System is insufficient as the sole system of record for electronic proof of export for drawback claims in its current state. As of April 2023, CBP said it continued to evaluate the Automated Export System and the Electronic Export Manifest. These efforts, as described, represent important progress toward implementing our recommendation, and we will review CBP's evaluation once finalized, to determine whether CBP has implemented our recommendation. Until CBP implements effective control activities for the drawback program, the U.S. government may be subject to revenue loss through duplicate or excessive claims for drawback related to export information.

Recommendation: The Commissioner of CBP should ensure that the Office of Trade turns the claim selection feature in the Automated Commercial Environment (ACE) back on and finalizes and implements procedures to target claims for review that were accepted into ACE during the period in which the selection feature was disabled.

Action Needed: CBP concurred with this recommendation. In April 2023, CBP told us it had drafted internal guidance instructing staff on the use of ACE to randomly target drawback claims for review. In addition, for drawback claims submitted when the ACE claim targeting feature was disabled, CBP said it had manually selected claims for review. To fully implement this recommendation, CBP must review claims that were accepted into ACE when the ACE claim targeting feature was disabled. Such reviews would better position CBP to protect U.S. trade revenue from improper payments of drawback claims.

²²Through the drawback program, CBP refunds up to 99 percent of duties, taxes, or fees previously paid by an importer. CBP makes these refunds on imported goods on which the importer previously paid duties, taxes, or fees, and subsequently exported from the U.S. or destroyed.

Director: Kimberly M. Gianopoulos, International Affairs and Trade

Contact information: GianopoulosK@gao.gov, (202) 512-8612

Southwest Border Security: Actions Are Needed to Address the Cost and Readiness Implications of Continued DOD Support to U.S. Customs and Border Protection. GAO-21-356. Washington, D.C.: February 23, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of Homeland Security, together with the Secretary of Defense, should define a common outcome for the Department of Defense's (DOD) support to DHS, consistent with best practices for interagency collaboration, and articulate how that support will enable DHS to achieve its southwest border security mission in fiscal year 2021 and beyond.

Action Needed: DHS concurred with this recommendation and stated that it will continue to use the request for assistance process to define and articulate a common outcome for DOD's support to DHS. However, as we stated in our report, this process has not enabled DOD and DHS to agree to a common outcome for DOD's support, because it focuses on meeting DHS's operational requirements over a short period of time. DHS has continued to submit requests for assistance to DOD through fiscal year 2023.

In March 2023, DHS shared positive steps toward implementing our recommendation. Specifically, DHS officials told us that DHS and Customs and Border Protection have outlined a multi-year DOD drawdown plan that focuses on human capital and technology investments. They are implementing this plan in conjunction with U.S. Border Patrol to address capability gaps currently filled by DOD personnel. DHS officials stated that they share a common goal with DOD to have a full withdrawal of DOD personnel by the end of 2028. They noted that the timing for the withdrawal of DOD personnel from the border is based on the amount of time DHS estimates CBP will need to recruit, hire, and onboard personnel and deploy surveillance technology. Officials told us they have not documented this goal in a formal agreement with DOD, nor have they formally articulated this as a common outcome for their collaboration. Once DOD and DHS document this agreement, with an articulated common outcome, both agencies will have a clearer understanding of how DHS will manage its border security mission with its own assets.

Director: Elizabeth Field, Director, Defense Capabilities and Management

Contact information: FieldE1@gao.gov, (202) 512-2775

Transportation Security

Critical Infrastructure Protection: Actions Needed to Address Significant Weaknesses in TSA's Pipeline Security Program Management. GAO-19-48. Washington, D.C.: December 18, 2018.

Year Recommendation Made: 2019

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to identify or develop other data sources relevant to threat,

vulnerability, and consequence consistent with the National Infrastructure Protection Plan and DHS critical infrastructure risk mitigation priorities and incorporate that data into the Pipeline Relative Risk Ranking Tool to assess relative risk of critical pipeline systems, which could include data on prior attacks, natural hazards, feedback data on pipeline system performance, physical pipeline condition, and cross-sector interdependencies.

Action Needed: DHS initially concurred with this recommendation. TSA officials reported seeking input from multiple sources, including the Department of Transportation's Pipeline and Hazardous Materials Administration, the Department of Homeland Security's Cybersecurity and Infrastructure Security Agency, the Department of Energy and the Federal Energy Regulatory Commission, as well as the industry-led Oil and Natural Gas Sector Coordinating Council.

However, as of January 2023, TSA officials reported that after examining the relative costs of integrating and maintaining non-security related data in the pipeline risk ranking tool, TSA sees little benefit to including these additional factors, if they are even determinable and distinguishable for specific pipeline systems. The officials stated these factors are not considered significant enough in comparison to other factors currently considered, such as throughput and service to critical infrastructure. TSA officials stated that there would be negligible change in the results of their risk calculations (and therefore very limited improvement in the TSA risk assessment methodology for security purposes) for the costs that would likely be incurred. However, in our recommendation, we refer to security and non-security information as important for enhancing TSA's pipeline risk ranking tool.

To fully implement this recommendation, incorporating both types of information, such as data on prior attacks, cross-sector dependencies, and pipeline system performance, would provide TSA with increased assurance that the agency accurately and comprehensively ranks relative risk among pipeline systems. We believe our recommendation is still valid, and we will continue to monitor the status of TSA's activities to address this recommendation.

Recommendation: The TSA Administrator should direct the Security Policy and Industry Engagement's Surface Division to take steps to coordinate an independent, external peer review of its Pipeline Relative Risk Ranking Tool, after the Pipeline Security Branch completes enhancements to its risk assessment approach.

Action Needed: DHS initially agreed with this recommendation. TSA officials reported that conducting an independent, external peer review of its Pipeline Relative Risk Ranking Tool is contingent upon completion of our recommended enhancements to the Tool. However, as of January 2023, TSA officials also reported that although they acknowledge there is some value in an independent review, the officials do not believe it is necessary or justified when weighed against competing funding and manpower requirements. To fully implement this recommendation, we agree that first implementing enhancements to TSA's risk assessment approach is necessary before launching a peer review. We also continue to view peer reviews as key to improving the technical quality and the credibility of risk assessments' underlying decision-making process.

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

Director: Tina Won Sherman, Homeland Security and Justice

Contact information: ShermanT@gao.gov, (202) 512-8777

Director: Marisol Cruz Cain, Information Technology and Cybersecurity

Contact information: cruzcaim@gao.gov, (202) 512-5017

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.

Year Recommendation Made: 2014

Recommendation: The Secretary of Homeland Security and the Administrator of the General Services Administration (GSA), after revising the DHS headquarters consolidation plans, should work jointly to develop revised cost and schedule estimates for the remaining portions of the consolidation project that conform to GSA guidance and leading practices for cost and schedule estimation, including an independent evaluation of the estimates.

Action Needed: DHS and GSA agreed with this recommendation. The Department of Homeland Security Headquarters Consolidation Accountability Act of 2015 required DHS to submit information to congressional committees regarding the current consolidation plan. The act required that DHS, in coordination with GSA, provide information that was consistent with what we recommended, including a comprehensive needs assessment, a costs and benefits analysis, and updated cost and schedule estimates.²³ In March 2022, DHS—with input from GSA—submitted its report to congressional committees in response to the act.

In August 2022, we found that this report did not contain sufficient information on the costs and schedules of the consolidation project's components for us to perform a comprehensive cost or schedule assessment. At that time, according to GSA officials, GSA was undertaking a planning and funding reset to include detailed cost and schedule estimates for the project's components. GSA officials said they expect to provide updated cost and schedule estimates in late May 2023. Once available, we will assess the extent to which the revised estimates address our recommendation and could thereby enable sound decision-making related to DHS's ongoing headquarters consolidation.

High Risk Area: [Managing Federal Real Property](#)

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

Director (Acting): David Marroni, Physical Infrastructure

Contact information: MarroniD@gao.gov, (202) 512-2834

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

Year Recommendation Made: 2018

²³Pub. L. No. 114-150, 130 Stat. 366 (2016).

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 it would begin implementing changes in the fall of 2018. According to Coast Guard officials, historically the closure process has been difficult due to factors such as concerns from affected communities and members of Congress. The Coast Guard has implemented a revised process, which includes notifications to Congress and Federal Register notices to obtain public comments prior to taking action to close stations. As of April 2023, the Coast Guard reported that it had consolidated six of the 18 identified stations with larger adjacent stations. The fiscal year 2023 Coast Guard budget proposed the consolidation of three additional stations.

The Coast Guard has partially addressed this recommendation but continues to evaluate redundant stations for closure as part of its boat optimization process. The service plans to recommend additional closures of stations identified as redundant in future budget submissions, which we will continue to monitor. To fully implement this recommendation, DHS, through the Coast Guard, should close boat stations that provide overlapping search and rescue coverage and are unnecessarily duplicative, according to its plan and target dates.

Potential Financial Benefit if Implemented: Millions

Director: Heather MacLeod, Homeland Security and Justice

Contact information: MacleodH@gao.gov, (202) 512-8777

Coast Guard Shore Infrastructure: Applying Leading Practices Could Help Better Manage Project Backlogs of at Least \$2.6 Billion. GAO-19-82. Washington, D.C.: February 21, 2019.

Year Recommendation Made: 2019

Recommendation: The Commandant of the Coast Guard should employ models for its asset lines for predicting the outcome of investments, analyzing trade-offs, and optimizing decisions among competing investments.

Action Needed: The Coast Guard agreed with our recommendation, but as of May 2023, had not employed models to evaluate its asset lines. Instead, the Coast Guard reported that it is evaluating alternatives to identify a preferred solution to recommend for implementation, and estimated that it will complete this analysis and fully implement a modeling solution by the end of September 2023. To fully implement this recommendation, the Coast Guard needs to employ its modeling solution for predicting the outcome of investments, analyzing trade-offs, and optimizing decisions among competing investments.

Potential Financial Benefit if Implemented: Millions

Director: Heather MacLeod, Homeland Security and Justice

Contact information: MacleodH@gao.gov, (202) 512-8777

Coast Guard: Actions Needed to Evaluate the Effectiveness of Organizational Changes and Determine Workforce Needs. [GAO-20-223](#). Washington, D.C.: February 26, 2020.

Year Recommendation Made: 2020

Recommendation: The Commandant of the Coast Guard should update its April 2018 Manpower Requirements Plan to include time frames and milestones for completing manpower requirements analyses and determinations for all positions and units.

Action Needed: DHS concurred with this recommendation. In March 2023, the Coast Guard submitted an updated Manpower Requirements Plan to Congress. However, this plan did not include timeframes and milestones for Coast Guard to complete manpower requirements analysis and determinations for all positions and units, as we recommended. In this way, the Coast Guard's new plan does not meet the intent of our recommendation. As of April 2023, we are awaiting clarification from the Coast Guard on its plans for implementing this recommendation.

Director: Heather MacLeod, Homeland Security and Justice

Contact information: MacLeodH@gao.gov, (202) 512-8777

Coast Guard: Actions Needed to Improve National Vessel Documentation Center Operations. [GAO-21-100](#). Washington, D.C.: December 16, 2020.

Year Recommendation Made: 2021

Recommendation: The Commandant of the Coast Guard should direct the Assistant Commandant for Prevention Policy to ensure that the National Vessel Documentation Center (NVDC) conducts a full cost study of NVDC's commercial and recreational user fees.

Action Needed: DHS concurred, but as of February 2023, had not implemented this recommendation. In concurring with this recommendation, the Coast Guard stated that the NVDC will conduct a full cost study of its commercial and recreational user fees, with oversight provided as needed by the Director of Operations Resource Management for the Deputy Commandant for Operations. DHS officials stated that the NVDC would do so after the Coast Guard develops a new information technology system to accurately assess the actual costs of providing services to the public, including new information technology support costs. DHS estimated that it would conduct the full cost study by June 30, 2023. In February 2022, Coast Guard officials told us they remained on track to meet the estimated completion date for the cost study.

As of February 2023, Coast Guard officials told us that the delivery date for the new information technology system, which had been planned for August 2022, has been delayed for an unknown period of time due to technical issues. As of February 2023, the Coast Guard did not have an estimated completion date for conducting the full cost study. By fully implementing this recommendation, the Coast Guard will have more assurance that its fees accurately charge users for the costs of providing its services.

Potential Financial Benefit if Implemented: Millions

Director: Heather MacLeod, Homeland Security and Justice

Contact information: MacLeodH@gao.gov, (202) 512-8777

DHS Employee Morale: Some Improvements Made, but Additional Actions Needed to Strengthen Employee Engagement. GAO-21-204. Washington, D.C.: January 12, 2021.

Year Recommendation Made: 2021

Recommendation: The DHS Office of the Chief Human Capital Officer (OCHCO) should monitor components' implementation of the OPM action planning cycle to ensure the components review and assess the results of their actions to adjust, reprioritize, and identify new actions needed to improve employee engagement.

Action Needed: DHS agreed with the recommendation. In March 2021, OCHCO issued written guidance for the DHS component employee engagement action planning process that includes mechanisms for OCHCO to monitor components' implementation of the OPM action planning cycle. The first set of employee engagement action plans following this guidance were finalized in late 2021 and early 2022. These planning cycles span 2 years, and therefore DHS has not yet completed a full cycle under the new guidance to enable us to assess the extent to which components are reviewing and assessing the results from one cycle to inform plans for the next cycle.

To fully implement this recommendation, OCHCO will need to continue implementing this monitoring framework and demonstrate that, as a result, components consistently review and assess the results of their employee engagement action planning efforts and use these assessments to adjust, reprioritize, and identify new actions to improve employee engagement. DHS expects components to finalize their next action plans in August 2023, at which point we will assess the extent to which OCHCO's and components' actions address our recommendation.

High Risk Area: [Strategic Human Capital Management](#)

Director: Christopher P. Currie, Homeland Security and Justice

Contact information: CurrieC@gao.gov, (202) 512-8777

Federal Contracting: Senior Leaders Should Use Leading Companies' Key Practices to Improve Performance. GAO-21-491. Washington, D.C.: July 27, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of Homeland Security should ensure the DHS Chief Procurement Officer (CPO) uses a balanced set of performance metrics to manage the department's procurement organizations, including outcome-oriented metrics to measure (a) cost savings/avoidance, (b) timeliness of deliveries, (c) quality of deliverables, and (d) end-user satisfaction.

Action Needed: DHS did not concur with the recommendation, stating that while the department supports the use of outcome-oriented metrics, it disagreed that the specific metrics included in our recommendation necessarily captured the most relevant aspects of procurement

organizations' performance. However, DHS also stated the CPO office would review its current metrics to determine whether they appropriately measure outcomes. We agree DHS could identify additional outcome-oriented metrics that are tailored to its needs. We also continue to believe DHS should address the recommendation by using the four types of metrics we identified because the corporate procurement leaders we interviewed emphasized the importance of using these four types of outcome-oriented metrics.²⁴

In January 2022, DHS said it was reviewing current processes and process-oriented metrics to determine what outcome-oriented metrics it could develop based on those processes. As of January 2023, the department estimated it would complete this effort by May 2023. This effort has the potential to help DHS address the recommendation if it leads to DHS using the four types of metrics we identified. Using these types of metrics would help DHS identify improvement opportunities, set priorities, and allocate resources.

Potential Financial Benefit if Implemented: A Hundred Million or More Annually

Director: William Russell, Contracting and National Security Acquisitions

Contact information: RussellW@gao.gov, (202) 512-4841

Information Technology and Cybersecurity

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

Year Recommendation Made: 2018

Recommendation: The Secretary of Homeland Security, in cooperation with the co-sector risk management agencies²⁵ 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 (NIST), as appropriate, to develop methods for determining the level and type of framework adoption by entities across their respective sectors.

Action Needed: DHS concurred with the recommendation in our report and stated that the department will continue to work closely with its private sector partners to ensure framework adoption is a priority. Additionally, department officials stated that the agency would try to better understand the extent of, and barriers to, framework adoption by entities across their respective sectors. In October 2022, the department took initial steps to develop methods to determine the level and type of framework adoption in its respective sectors. Specifically, the department developed cross-sector cybersecurity performance goals that outline high-priority, baseline measures that businesses and critical infrastructure owners of all sizes can take to protect themselves from cyber threats. Each goal aligns with a corresponding practice in the NIST cybersecurity framework. Thus, the cross-sector performance goals can provide a basis for

²⁴The four types of outcome-oriented metrics measure (a) cost savings/avoidance, (b) timeliness of deliveries, (c) quality of deliverables, and (d) end-user satisfaction.

²⁵The *William M. (Mac) Thornberry National Defense Authorization Act for Fiscal Year 2021* has updated the name for these agencies, stating that the term "sector risk management agency" holds the meaning previously given to the term "sector specific agency." Pub. L. No. 116-283, § 9002(a)(7), 134 Stat. 3388, 4768 (2021).

DHS and other sector risk management agencies to better understand and evaluate the extent to which individual sectors have adopted and implemented the framework

According to DHS, the department plans to link the cross-sector performance goals to its suite of products and services and may be able to identify framework adoption and progress based on information it is able to gather through its products and services. As of April 2023, DHS had not yet completed these efforts.

To fully implement our recommendation, DHS needs to provide evidence that reflects the implementation of these planned steps to effectively determine framework adoption among entities within its respective sectors. While DHS has taken important initial steps towards measuring framework adoption and use among multiple sectors by establishing the cross-sector cybersecurity performance goals, implementing our recommendations to gain a more comprehensive understanding of the framework's use by all of its critical infrastructure sectors is essential to the success of protection efforts.

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

Director: David Hinchman, Information Technology and Cybersecurity

Contact information: HinchmanD@gao.gov, (214) 777-5719

Homeland Security: DHS Needs to Fully Implement Key Practices in Acquiring Biometric Identity Management System. [GAO-21-386](#). Washington, D.C.: June 8, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of DHS should direct the Office of Biometric Identity Management (OBIM) Director to ensure that, moving forward, the Homeland Advanced Recognition Technology (HART) program tracks and monitors all of its costs, including government labor costs.

Action Needed: DHS agreed with this recommendation. Further, the department showed that OBIM had included government labor costs in the HART program's 2022 Life Cycle Cost Estimate. However, OBIM had not yet demonstrated that it was tracking and monitoring HART-specific government labor costs on an ongoing basis. OBIM officials stated that they plan to incorporate actual costs from fiscal year 2022 in the next annual update to the HART Life Cycle Cost Estimate. The officials recently provided us with this updated estimate in May 2023. We will assess the documentation to determine whether the program is accurately tracking and monitoring all costs. If DHS demonstrates that it fully implemented this recommendation, it will help the program mitigate further schedule delays and cost overruns.

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

Director: Kevin Walsh, Information Technology and Cybersecurity

Contact information: WalshK@gao.gov, (202) 512-6151

Privacy: Dedicated Leadership Can Improve Programs and Address Challenges. GAO-22-105065. Washington, D.C.: September 22, 2022.

Year Recommendation Made: 2022

Recommendation: The Secretary of Homeland Security should fully define and document the role of the senior agency official for privacy or other designated privacy official in reviewing and approving system categorizations, overseeing privacy control assessments, and reviewing authorization packages.

Action Needed: DHS agreed with this recommendation and stated that it would continue to fully define the role of its Chief Privacy Officer in these areas and review and update relevant policies and instructions as appropriate. As of February 2023, DHS had not provided further updates on any actions taken to address this recommendation. Fully defining the roles of privacy officials in this process will help DHS ensure that privacy protections are consistently incorporated into systems with personally identifiable information.

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

Director: Jennifer R. Franks, Director, Center for Enhanced Cybersecurity, Information Technology and Cybersecurity

Contact Information: FranksJ@gao.gov, (404) 679-1831

Coast Guard: Actions Needed to Enhance IT Program Implementation. GAO-22-105092. Washington, D.C.: July 28, 2022.

Year Recommendation Made: 2022

Recommendation: The Commandant of the U.S. Coast Guard should direct the Deputy Commandant for Mission Support to implement the leading practices for network capacity planning that we identified, including (1) compiling a complete and accurate inventory of hardware, software, and configurations; (2) identifying traffic growth predictions; (3) prioritizing network traffic; (4) performing simulations and what-if-analyses; and (5) continually monitoring the health of the infrastructure to ensure it is meeting demand and mission needs.

Action Needed: DHS concurred with this recommendation. In January 2023, DHS stated that the Coast Guard will implement the leading practices for network capacity planning we recommended through its pending Enterprise Infrastructure Services contract, and will take measures to implement network capacity planning. DHS added that in September 2021, the Coast Guard procured a new inventory system called Alphabet, and is in the process of updating system data. As of May 2023, the Coast Guard plans to fully implement the recommendation by March 29, 2024. In order to do so, the Coast Guard will need to demonstrate that it has established and implemented policies and practices that address each of the leading practices we identified for network capacity planning.

Recommendation: The Commandant of the U.S. Coast Guard should direct the Deputy Commandant for Mission Support to ensure that the plan or strategy for aligning all operational technology to the Department of Defense risk management framework is effectively implemented.

Action Needed: DHS concurred with this recommendation. In January 2023, DHS stated that the Coast Guard plans to update its cybersecurity policy to require that all operational technology comply with the Department of Defense risk management framework. As of May 2023, the Coast Guard estimates that the policy update will be completed by June 30, 2023. DHS added that upon completion of the NIST special publication 800-82 Rev. 3, the Coast Guard will also review the updated guidance and determine how to best align a future Operational Technology Cybersecurity Risk Management Implementation Standard to this guidance, as well as measure the effectiveness of the implementation. To fully implement the recommendation, the Coast Guard will need to demonstrate that it has planned for how to align all of its operational technology to the Department of Defense's risk management framework and that the plan has been implemented. By doing so, Coast Guard could be better positioned to manage cybersecurity risks to its operational technology.

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

Director: Jennifer Franks, Information Technology and Cybersecurity

Contact information: FranksJ@gao.gov, (404) 679-1831

Cyber Insurance: Action Needed to Assess Potential Federal Response to Catastrophic Attacks. [GAO-22-104256](#). Washington, D.C.: June 21, 2022.

Year Recommendation Made: 2022

Recommendation: The Director of the Cybersecurity and Infrastructure Security Agency should work with the Director of the Federal Insurance Office to produce a joint assessment for Congress on the extent to which the risks to the nation's critical infrastructure from catastrophic cyberattacks, and the potential financial exposures resulting from these risks, warrant a federal insurance response.

Action Needed: DHS agreed with this recommendation. DHS has collaborated with the Department of the Treasury on identifying data needs for the agencies' joint assessment of the need for a federal insurance response to address catastrophic cyberattacks. To fully implement this recommendation, DHS needs to continue working with Treasury to determine additional data needs for the agencies' joint assessment, as DHS has indicated is its intent. An assessment with DHS's analysis of the cyber risks facing critical infrastructure could inform Congress in its deliberations related to addressing the increasing risk of catastrophic cyber incidents for U.S. critical infrastructure.

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

Director: Kevin Walsh, Information Technology and Cybersecurity

Contact information: WalshK@gao.gov, (202) 512-6151

Chemical Security

Critical Infrastructure Protection: Actions Needed to Enhance DHS Oversight of Cybersecurity at High-Risk Chemical Facilities. [GAO-20-453](#). Washington, D.C.: May 14, 2020.

Year Recommendation Made: 2020

Recommendation: The Assistant Director of the Infrastructure Security Division should develop a workforce plan that addresses the program's cybersecurity-related needs, which should include an analysis of any gaps in the program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them.

Action Needed: DHS concurred with this recommendation and took several steps to begin addressing it. According to CISA officials, as of March 2023, they had issued new guidance to assist with chemical security workforce planning and estimated that they would implement the requirements of the workforce plan by August 2023. Fully addressing this recommendation by developing a workforce plan that includes analysis of any gaps in the chemical security program's capacity and capability to perform its cybersecurity-related functions, and human capital strategies to address them, will help the program ensure that it has the appropriate number of staff to carry out cybersecurity-related efforts.

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

Director: Tina Won Sherman, Homeland Security and Justice

Contact information: ShermanT@gao.gov, (202) 512-8777

Countering Violent Extremism

Countering Violent Extremism: DHS Can Further Enhance Its Strategic Planning and Data Governance Efforts. [GAO-21-507](#). Washington, D.C.: July 20, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of Homeland Security should ensure that the Office of Counterterrorism and Threat Prevention Policy and affected components and offices revise or supplement DHS's Countering Terrorism and Targeted Violence strategy to include all key elements of a comprehensive strategy.

Action Needed: DHS concurred with the recommendation. In February 2022, DHS stated that it was consolidating action items from its posture review with similar items contained in the White House implementation plan. As of May 2023, DHS officials stated that the department was undergoing a reorganization that has affected its plans to complete this recommendation. DHS plans to complete this process by June 2023. At that time, we will request an update on the extent these ongoing efforts incorporate key elements of a comprehensive strategy. By incorporating all key elements of a comprehensive strategy in its efforts, DHS would be better positioned to proactively mitigate such factors or plan for contingencies, if needed.

Recommendation: The Secretary of Homeland Security should ensure that the Chief Data Officer—in consultation with other affected offices and components—incorporates the

governance of data needed to support DHS's targeted violence and terrorism prevention mission into its departmental data governance framework, including determining how targeted violence and terrorism prevention will be represented on the data governance body, conducting a data maturity assessment, and identifying opportunities to increase staff data skills that includes targeted violence and terrorism prevention data.

Action Needed: DHS originally concurred with the recommendation, and had taken steps to incorporate planned data collection into its data governance framework. For instance, the department had identified the data domains that would govern targeted violence and terrorism prevention data. However, in February 2023, DHS officials stated that they are considering not initiating new efforts to collect targeted violence and terrorism prevention data because the department may already collect similar or related data. To corroborate DHS's change in approach and its rationale, we have requested further documentation to consider whether this recommendation is still applicable or whether the new approach addresses the intent of the recommendation.

Recommendation: The Secretary of Homeland Security—in consultation with affected offices and components—should establish common terminology for targeted violence.

Action Needed: DHS concurred with this recommendation. DHS originally stated that it planned to add targeted violence to its approved DHS Lexicon by August 31, 2022. However, as of May 2023, officials stated that the department was undergoing a reorganization that has affected the timeline for implementing this recommendation. It plans to complete this recommendation by June 2023. Without a common definition for targeted violence, it will be difficult for DHS to assess threats, track trends, and build effective policy within DHS and the stakeholder community.

Director: Triana McNeil, Homeland Security and Justice

Contact information: McNeilT@gao.gov, (202) 512-8777

Domestic Intelligence and Information Sharing

Capitol Attack: Special Event Designations Could Have Been Requested for January 6, 2021, but Not All DHS Guidance is Clear. [GAO-21-105255](#). Washington, D.C.: August 9, 2021.

Year Recommendation Made: 2021

Recommendation: The Secretary of Homeland Security should consider whether additional factors, such as the context of the events and surrounding circumstances in light of the current environment of emerging threats, are needed for designating National Special Security Event (NSSE) events.

Action Needed: As of March 20, 2023, DHS officials stated that they did not concur with this recommendation and requested that GAO consider the recommendation resolved and closed. We disagree and maintain that implementing this recommendation is important. We acknowledge that past congressional certifications of election results were not designated NSSEs, and DHS officials considered this normal congressional business. However, the lack of consideration of other factors, such as the large rally at the Ellipse that mobilized to the Capitol

and the climate surrounding the 2020 election demonstrated a gap in how adaptable the event designation process is to such factors.

To fully implement this recommendation, DHS needs to formally review the factors it developed to designate a NSSE, including whether additional events should be designated as an NSSE. A review of these factors can help ensure that the process for designating an NSSE is dynamic and responsive to changing environments and emerging threats.

Recommendation: The Secretary of Homeland Security should update the Department of Homeland Security's policy to clarify and communicate the process for requesting an NSSE designation for an event held on federal property in Washington, D.C., to all relevant stakeholders, including relevant federal, state, and local entities.

Action Needed: As of March 20, 2023, DHS officials stated that they did not concur with this recommendation and requested that GAO consider the recommendation resolved and closed. We disagree and maintain that implementing this recommendation is important. As noted in our report, there is a gap in DHS's policy and in the awareness of relevant partners regarding the process. Clarifying and communicating the DHS policy for requesting an NSSE designation for events on federal property in Washington, D.C. will help ensure that responsible entities are aware of their ability to make such a request.

To fully implement this recommendation, DHS needs to clarify its policy to identify who can request an NSSE designation on federal property in Washington, D.C and communicate any updates to relevant stakeholders. Updating its policy will help DHS ensure that relevant agencies are aware of, and understand, the process for requesting such event designations and may help to better secure the Capitol Complex and other federal properties in the future.

Director: Triana McNeil, Homeland Security and Justice

Contact information: McNeilT@gao.gov, (202) 512-8777

Capitol Attack: Federal Agencies Identified Some Threats, but Did Not Fully Process and Share Information Prior to January 6, 2021. [GAO-23-106625](#). Washington, D.C.: February 28, 2023

Year Recommendation Made: 2023

Recommendation: The DHS Under Secretary for Intelligence and Analysis (I&A) should assess the extent to which its internal controls ensure personnel follow existing and updated policies for processing open source threat information.

Action Needed: DHS concurred with this recommendation. DHS recognizes the need for a robust internal controls program. To this end, DHS I&A established an internal controls branch, who, in fiscal year 2022, began the process of gathering foundational data to establish a systemic assessment process. Upon completion of its data gathering, DHS plans to conduct this assessment and expects to complete these efforts by September 29, 2023. We are encouraged that DHS plans to include the assessment of internal controls related to sharing open source threat information with external partners in this process. However, gathering data is only the first step, and it is important for DHS, as it embarks on this effort, to ensure it has the right skill set and is capturing appropriate data to assess the sharing of open source threat information. Completing the assessment will provide DHS I&A with information to address internal control

deficiencies and help ensure that personnel consistently follow existing and updated policies for processing open source threat information.

Recommendation: The DHS I&A Under Secretary should assess the extent to which its internal controls ensure personnel consistently follow the policies for sharing threat-related information with relevant agencies such as Capitol Police.

Action Needed: DHS concurred with this recommendation. DHS recognizes the need for a robust internal controls program. To this end, DHS I&A established an internal controls branch, who, in fiscal year 2022, began the process of gathering foundational data to establish a systemic assessment process. Upon completion of its data gathering, DHS plans to conduct this assessment and expects to complete these efforts by September 29, 2023. We are encouraged that DHS plans to include the assessment of internal controls related to sharing threat information with relevant partners such as the Capitol Police. However, gathering data is only the first step, and it is important for DHS, as it embarks on this effort, to ensure it has the right skill set and is capturing appropriate data to assess the sharing of threat information. Completing the assessment will provide DHS I&A with information to address internal control deficiencies and help ensure that personnel consistently follow existing and updated policies for sharing information.

Director: Triana McNeil, Homeland Security and Justice

Contact information: McNeilT@gao.gov, (202) 512-8777