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Comptroller General  
of the United States

Accessible Version

May 2, 2025

The Honorable Pamela Bondi  
Attorney General  
Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, D.C. 20530

**Priority Open Recommendations: Department of Justice**

Dear Attorney General Bondi:

Congratulations on your appointment. The purpose of this letter is to call your personal attention to four areas based on GAO's past work and 17 open priority recommendations, which are enclosed.<sup>1</sup> Additionally, there are 90 other GAO open recommendations that we will continue to work with your staff to address.

We are highlighting the following areas that warrant your timely and focused attention. Specifically:

**Management of the Federal Prison System.** The Bureau of Prisons (BOP) is responsible for the care, custody, safety, and rehabilitation of approximately 155,000 incarcerated people. However, prison buildings are deteriorating and in need of repair and maintenance, and facilities are understaffed, putting both incarcerated people and staff at risk. Moreover, efforts to prevent recidivism have not been thoroughly evaluated, undermining a key goal to help incarcerated people make a successful transition into society once released. As a result, we added management of the federal prison system to GAO's [High-Risk List](#) in 2023.<sup>2</sup>

Our work has highlighted the need for BOP to address critical staffing shortages, improve its implementation of the First Step Act of 2018 (First Step Act)<sup>3</sup>, and better oversee its use of restrictive housing. Taking our recommended actions could help ensure the safety and security

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<sup>1</sup>GAO considers a recommendation to be a priority if when implemented, it 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.

<sup>2</sup>GAO, *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).

<sup>3</sup>Pub. L. No. 115-391, 132 Stat. 5194.

of incarcerated people and staff and help ensure the successful reintegration of incarcerated people into the community.

**Countering Domestic Terrorism.** Several federal agency threat assessments issued since 2021 reported that the domestic terrorism threat will continue to persist or rise in the future. Further, domestic terrorism investigations have more than doubled since 2020, according to the Federal Bureau of Investigation (FBI). The FBI has lead responsibility for federal domestic terrorism investigations and domestic intelligence efforts involving terrorist activities or acts in preparation of terrorist activities in the U.S. DHS focuses on gathering, analyzing, producing, and sharing information on emerging terrorist threats with federal, state and local government agencies, and private entities.

The FBI and DHS have taken steps to assess their existing formal agreements to determine if they fully articulate a joint process for working together and sharing terrorist threat information. Fully assessing these agreements and updating and revising them accordingly would enhance FBI and DHS efforts to counter domestic terrorism threats.

**Efforts to Combat Illicit Opioid Use.** The use of illicit drugs and the misuse of prescription drugs has been a persistent public health issue in the United States for several years. Moreover, hundreds of thousands of people have died from misusing drugs, and society and the economy have suffered significant harms. As a result, we added national efforts to prevent, respond to, and recover from drug misuse to GAO's [High-Risk List](#) in 2021.<sup>4</sup>

Our work has highlighted the need for the Drug Enforcement Administration (DEA) to provide additional guidance to distributors of controlled substances regarding their roles and responsibilities for monitoring and reporting suspicious orders. However, DEA has yet to publish additional guidance regarding the monitoring of suspicious orders. Taking this action will better position DEA to support its mission of preventing diversion of drugs for illicit use, while ensuring an adequate and uninterrupted supply of controlled substances for legitimate medical needs.

**Efforts to Combat Money Laundering.** Effective efforts to combat money laundering rely on the coordination of multiple federal law enforcement agencies and task forces and comprehensive government-wide data on investigation outcomes. However, our work has shown that these agencies track the outcomes of their anti-money laundering investigations using their own case management systems. As a result, one agency may measure or report outcomes different than another agency, leading to fragmented data collection and potential duplicative reporting.

We recommended that the Department of Justice (DOJ) lead an effort, in coordination with DHS and the Department of Treasury (Treasury), to develop a standard methodology for producing government-wide data on the outcomes of anti-money laundering investigations. Doing so would yield better information on the effectiveness of federal efforts to combat money laundering and help identify ways to improve anti-money laundering strategies.

Please see Enclosure 1 for additional details about the status and actions needed to fully implement all 17 open priority recommendations out of the 107 total recommendations that

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<sup>4</sup>GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas*, [GAO-21-119SP](#) (Washington, D.C.: March 2, 2021).

remain open. This includes priority recommendations on information technology and cybersecurity and the Public Safety Officers' Benefits Program.

We also provide in Enclosure 2 additional information on DOJ's recommendation implementation rate and implemented, closed, and new priority recommendations since our May 2024 letter to Attorney General Garland; DOJ-specific information relevant to our audit of the consolidated financial statements of the U.S. government; and relevant management challenges from GAO's [High-Risk List](#) that apply to DOJ. In response to legislation enacted in December 2022, this enclosure also includes information on any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.

Copies of this letter are being sent to the appropriate congressional committees. The letter will also be available on the GAO website at [Priority Recommendations | U.S. GAO](#). We also plan to send separate letters specifically focused on open recommendations and key issues related to financial management and information technology. These letters will be sent respectively to your Chief Financial Officer and Chief Information Officer, or other official acting in that capacity.

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 Jason L. Bair, Managing Director, Homeland Security and Justice Team at [BairJ@gao.gov](mailto:BairJ@gao.gov). Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these priority recommendations and the remaining 90 open recommendations. I appreciate DOJ's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

**//SIGNED//**

Gene L. Dodaro

Comptroller General

of the United States

Enclosures – 2

cc: The Honorable Todd Blanche, Deputy Attorney General  
The Honorable Kash Patel, Director, FBI  
Jolene Ann Lauria, Assistant Attorney General for Administration, Justice Management Division  
Sirce E. Owen, Acting Director, Executive Office for Immigration Review  
Derek Maltz, Acting Administrator, DEA

Robert Murphy, Principal Deputy Administrator, DEA

Thomas W. Prevoznik, Deputy Assistant Administrator, Office of Diversion Control, DEA

Melinda Rogers, Deputy Assistant Attorney General for Information Resource  
Management/Chief Information Officer

Kathleen Toomey, Associate Deputy Director, BOP

Tammie Gregg, Acting Director, Bureau of Justice Assistance

Maureen Henneberg, Deputy Assistant Attorney General

Christopher C. Alvarez, Deputy Assistant Attorney General/Controller

## Enclosure 1

### Priority Open Recommendations to Department of Justice

#### Management of the Federal Prison System

*Bureau of Prisons: Opportunities Exist to Better Analyze Staffing Data and Improve Employee Wellness Programs.* [GAO-21-123](#). Washington, D.C.: February 24, 2021.

#### Year Recommendation Made: 2021

**Recommendation:** The Director of the Bureau of Prisons (BOP) should develop and implement a reliable method, or amend existing methods, for calculating staffing levels at BOP institutions.

**Action Needed:** BOP concurred and hired a contractor in June 2021 to help address this recommendation. According to BOP, the contractor is responsible for developing a tool to calculate and forecast staffing levels across the bureau. In March 2023, BOP reported that the contractor was testing the tool in three of BOP's six regions, primarily focusing on correctional officer positions. As of February 2025, BOP officials told us that the tool had been rolled out to all BOP regions and all position disciplines in October 2024. Given the roll out of the new tool, we will continue to monitor its implementation to determine its reliability. Successful implementation of this tool could better position BOP to take corrective action to address staffing shortfalls.

**Recommendation:** The Director of BOP should conduct a risk assessment of its overtime and augmentation use, including identifying risks to staff, inmates, and institution security; and determining actions to respond, as appropriate.

**Action Needed:** BOP concurred with this recommendation. It reported in February 2022 that a contractor was finalizing a risk analysis of the agency's current use of overtime and augmentation. In March 2023, BOP reported that the contractor had finished the analysis, which allowed BOP to track overtime and augmentation usage more easily. The report included a study from the contractor related to the risks of overtime and augmentation. The study, based on limited data, did not find a strong correlation between overtime and augmentation with the risks it analyzed. In March 2024, BOP officials acknowledged the limitations of the study and said that other evidence suggested there are negative impacts from relying on overtime and augmentation. However, BOP does not have plans to pursue an additional study on the risks of overtime and augmentation.

As of February 2025, BOP data from fiscal year 2021 through 2024 showed a 43 percent increase in overtime hours and a 15 percent increase in augmentation hours. BOP officials told us that their goal is to maintain full staffing and reduce reliance on both augmentation and overtime. However, they also stated that the fundamental staffing shortage of correctional officers limit the issue from being fully resolved. To fully implement the recommendation, BOP needs to continue to track the drivers and trends of overtime and augmentation usage. This will help BOP identify risks and invest in short and long-term solutions to mitigate those risks.

#### Potential Financial Benefit if Implemented: Millions

**Recommendation:** The Director of BOP should assess the outcomes of the staffing incentives it utilizes by developing performance measures and goals, measuring outcomes against them, and adjusting incentives, as appropriate.

**Action Needed:** BOP concurred with this recommendation. It reported in February 2022 that a contractor was finalizing a risk analysis of the agency's current use of staffing incentives. In

June 2023, BOP released its *Incentives Playbook*, with the intended purpose of standardizing BOP's approach to staffing incentives. The *Incentives Playbook* also includes performance metrics to evaluate the effectiveness of the incentives. In March 2024, BOP reported that it will have sufficient data to be able to measure the outcomes of performance metrics in 2025. As of February 2025, officials reported some preliminary results from its use of retention incentives but stated that further analysis was being conducted to assess the results against its performance metrics. BOP's ongoing work to measure and report on outcomes should help BOP determine the effectiveness of its staffing incentives.

**High-Risk Area:** [Strengthening Management of the Federal Prison System; Strategic Human Capital Management](#)

**Director:** Gretta L. Goodwin, Homeland Security and Justice

**Contact information:** [GoodwinG@gao.gov](mailto:GoodwinG@gao.gov)

*Federal Prisons: Bureau of Prisons Should Improve Efforts to Implement its Risk and Needs Assessment System.* [GAO-23-105139](#). Washington, D.C.: March 20, 2023.

**Year Recommendation Made:** 2023

**Recommendation:** The Director of BOP should use and document the results of its ongoing monitoring of the frequency at which it conducts risk and needs assessments, and take appropriate corrective actions, as needed.

**Action Needed:** BOP concurred with this recommendation and officials stated they planned to enhance their auto-calculation time credits application to integrate risk, needs, and time credits assessments into a single, monthly automated process. According to BOP, this application will automate and independently generate these assessments and will more clearly document completion at the intervals prescribed by the First Step Act and BOP internal timeframes.<sup>5</sup> As of January 2025, BOP officials stated they are continuing to work on the application.

BOP officials stated that it will take at least one year after implementation of the changes to generate data necessary to evaluate the need for corrective actions, as these assessments occur every 180-days. Fully implementing these actions would better position BOP to ensure it is conducting assessments in accordance with First Step Act requirements and BOP internal time frames, and take corrective actions as needed.

**Recommendation:** The Director of BOP should ensure its plan for evaluating evidence-based recidivism reduction programs has pre-established, quantifiable goals that align with the First Step Act, and includes clear milestone dates.

**Action Needed:** BOP concurred with this recommendation and updated its evaluation plan in August 2023 and January 2024. As a result of these changes, its evaluation plan includes milestone dates (i.e., initiation and anticipated completion dates for its evaluations) through fiscal year 2026. The evaluation plan also states that BOP will revise it in 2026 to include the

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<sup>5</sup>18 U.S.C. § 3632(d)(5).

evaluation of programs not currently included and that future evaluations are dependent upon the availability of resources and funding.

However, the updated plan does not include pre-established, quantifiable goals that align with the requirements in the First Step Act. Specifically, the Attorney General is required to conduct ongoing research on which evidence-based recidivism reduction programs are the most effective at reducing recidivism, and the type, amount, and intensity of programming that most effectively reduces the risk of recidivism.<sup>6</sup> BOP officials stated that they plan to carry out these requirements and the evaluation plan references the First Step Act requirements.

However, the plan does not include specific details about how BOP will determine which programs are the most effective at reducing recidivism or the type, amount, and intensity of programming that most effectively reduces the risk of recidivism. By including these elements in its evaluation plan, BOP will be better positioned to ensure its evaluations fully align with requirements in the First Step Act.

**Recommendation:** The Director of BOP should develop a mechanism to monitor, on an ongoing basis, if it is offering a sufficient amount of evidence-based recidivism reduction programs and productive activities to meet the needs of its incarcerated population.

**Action Needed:** BOP concurred with this recommendation and officials stated they were in the process of developing a First Step Act Dashboard, which would display the level of needs and the amount of programming available to meet those needs at each facility. According to these officials, the First Step Act Dashboard would allow BOP to monitor trends, increase areas of emphasis, and shift focus and resources.

BOP officials stated the initial construction of the dashboard was completed in the first quarter of fiscal year 2024, and they are working with the contractor to troubleshoot data access limitations. In April 2025, BOP officials stated they were in the testing phase, and after completion, they will deploy the dashboard nationwide. By fully implementing the dashboard, BOP will be better positioned to determine if it is offering a sufficient amount of evidence-based recidivism reduction programs and productive activities to address the needs of its population.

**Recommendation:** The Director of BOP should document a complete list of all the unstructured productive activities that incarcerated people are able to participate in and earn First Step Act time credits.

**Action Needed:** BOP did not concur with this recommendation and officials stated that it was not statutorily required to document such a list, and such action would not be useful or feasible. While the First Step Act and implementing regulations do not explicitly require BOP to document a complete list, the Act and regulations do provide an opportunity for eligible incarcerated people to earn First Step Act time credits if they successfully participate in programs or productive activities recommended based on their risk and needs assessment.<sup>7</sup> Documenting a

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<sup>6</sup>18 U.S.C. § 3631(b)(3)(C).

<sup>7</sup>18 U.S.C. § 3632(a)(5), (d)(4), 28 C.F.R. § 523.40(b); see also Department of Justice, Bureau of Prisons, *First Step Act of 2018 - Time Credits: Procedures for Implementation of 18 U.S.C. § 3632(d)(4)*, 5410.01 (Washington, D.C.: Nov. 18, 2022)(Change Notice – Feb. 6, 2023).

list of all programs and activities would help ensure that BOP is transparent on how incarcerated people can earn time credits.

BOP officials stated that they revised the First Step Act Approved Programs Guide in September 2023 to clarify that incarcerated people earn time credits based on their “opt-in status.” According to the guide, incarcerated people may begin opt-in status upon completion of all needs assessment surveys. Further, the guide clarifies the conditions that would result in an opt-out status (e.g., the person declines recommended programming that correspond to an identified need). In February 2024, BOP officials stated that unstructured productive activities do not have an impact on opt-in status, and that opt-in status is how BOP defines “successful participation.”

However, this is not consistent with BOP’s program statement, which generally states that eligible incarcerated people who successfully participate in evidence-based recidivism reduction programs or productive activities, including unstructured productive activities, may earn time credits. It further states that successful participation requires a determination by BOP staff that an eligible person has participated in the evidence-based recidivism reduction programs or productive activities that BOP has recommended based on the person’s needs assessment and the person has complied with the requirements of each program or productive activity.

In February 2024, BOP officials stated they are aware of the inaccuracies in the program statement, and they are in the process of revising it. In January 2025, BOP officials stated they will continue to provide updates on their progress in updating this policy. To fully address this recommendation, BOP needs to either revise its policy to reflect these changes or document a list of unstructured productive activities. By implementing these actions, BOP will be able to be transparent about a process that it has established in policy.

**Recommendation:** The Director of BOP should collect and monitor participation data for unstructured productive activities that incarcerated people are able to participate in and earn First Step Act time credits.

**Action Needed:** BOP did not concur with this recommendation and officials stated that it was not statutorily required, nor helpful, to monitor these activities. In February 2024, BOP officials stated that unstructured productive activities do not have an impact on opt-in status, and that opt-in status is how BOP defines “successful participation” for the purposes of time credits. However, this is not consistent with BOP’s program statement that states eligible incarcerated people who successfully participate in evidence-based recidivism reduction programs or productive activities, including unstructured productive activities, may earn time credits. We continue to believe that BOP should take steps to either revise its policy to reflect these changes or monitor participation data for unstructured productive activities. Taking these actions will better position BOP to know the status of each incarcerated person’s participation in activities for which they may earn time credits.

**High-Risk Area:** [Strengthening Management of the Federal Prison System](#)

**Director:** Gretta L. Goodwin, Homeland Security and Justice

**Contact information:** [GoodwinG@gao.gov](mailto:GoodwinG@gao.gov)

*Bureau of Prisons: Additional Actions Needed to Improve Restrictive Housing Practices.* [GAO-24-105737](#). Washington, D.C.: February 6, 2024.

**Year Recommendation Made:** 2024

**Recommendation:** The Director of BOP should enhance oversight by developing and implementing a process to verify and document that facilities have implemented corrective actions that fully address all deficiencies.

**Action Needed:** BOP concurred with this recommendation and issued interim guidance in March 2024 to facility leadership on its newly developed internal audit process. According to this guidance, the process is designed to identify causes of common findings that recur across multiple facilities and to implement a follow-up process to mitigate them. As of February 2025, the new internal audit process requires the audited entity to prepare a document listing planned corrective actions for each finding and recommendation included on an audit report. This document is then to be evaluated by subject matter experts in the Regional Office and Central Office Division to ensure consistency with current policy or procedures and acknowledge that planned actions will reduce or eliminate the negative finding. The Program Review Division will then analyze each document and determines whether the planned corrective actions are responsive, partially responsive, or not responsive to each finding. This analysis will also identify future evidence required to be submitted at the 90-day follow up. The Program Review Division will continue to assess evidence submitted for each follow up until the finding is closed by the audit authority.

BOP officials told us that as they implement the new audit process, they are testing these new procedures to ensure they are sound before finalizing them as official policy. To fully implement this recommendation, BOP must finalize and approve the policy via a program statement establishing the new audit process. This will confirm the new process has been fully tested and implemented.

**Recommendation:** The Director of BOP should develop and implement a mechanism to identify causes of common deficiencies that recur across multiple facilities and take steps to address those causes.

**Action Needed:** BOP concurred with this recommendation. As of February 2025, BOP officials told us that the new (aforementioned) internal audit process ensures that subject matter experts at all levels (individual site/facility, regions, and division level) are aware of the audit reports under their program areas. Regional Office and Central Office Division subject matter experts are responsible for monitoring the audit reports to identify common findings in their program areas and to determine whether appropriate corrective actions are needed within the region or agency wide. The Regional Office or Central Office Division must provide a memorandum to the Program Review Division identifying any internal controls they determine need to be implemented to address common findings identified in internal audit reports and the time frame for implementing them.

The Program Review Division has not yet received any memoranda documenting that actions were taken to address common findings within a region or agency wide. Further, BOP officials told us that as they implement the new audit process, they are testing these new procedures to ensure they are sound before finalizing them as official policy. To fully implement this recommendation, BOP must finalize and approve the policy via a program statement establishing the new audit process. BOP must also provide documentation that Regional Office and Central Office Division subject matter experts have monitored the audit reports in the manner described and provided a memorandum to the Program Review Division as applicable.

Doing so will confirm that BOP has implemented its process for mitigating the recurrence of common deficiencies across multiple facilities.

**High-Risk Area:** [Strengthening Management of the Federal Prison System](#)

**Director:** Gretta L. Goodwin, Homeland Security and Justice

**Contact information:** [GoodwinG@gao.gov](mailto:GoodwinG@gao.gov)

**Countering Domestic Terrorism**

*Domestic Terrorism: Further Actions Needed to Strengthen FBI and DHS Collaboration to Counter Threats.* [GAO-23-104720](#). Washington, D.C.: February 22, 2023.

**Year Recommendations Made:** 2023

**Recommendation:** The Director of the Federal Bureau of Investigation (FBI) should, in collaboration with the Department of Homeland Security (DHS) Under Secretary for Intelligence and Analysis, assess existing formal agreements to determine if they fully articulate a joint process for working together to counter domestic terrorism threats and sharing relevant domestic terrorism-related information and update and revise accordingly.

**Action Needed:** The FBI agreed with this recommendation. As of March 2024, the FBI had formed an internal working group to assess its existing agreements with DHS to counter domestic terrorism threats and share information. As of February 2025, FBI and DHS have reached one new agreement to assign an FBI staff member to a DHS counterterrorism office to better facilitate information sharing. To fully implement this recommendation, FBI will need to complete its internal review and coordinate with DHS to make any additional needed updates or revisions to existing agreements. Doing so will better position FBI and DHS to work together to counter domestic terrorism threats.

**Director:** Triana McNeil, Homeland Security and Justice

**Contact information:** [McNeilT@gao.gov](mailto:McNeilT@gao.gov)

**Efforts to Combat Illicit Opioid Use**

*Prescription Drugs: More DEA Information about Registrants' Controlled Substances Roles Could Improve Their Understanding and Help Ensure Access.* [GAO-15-471](#). Washington, D.C.: June 25, 2015.

**Year Recommendation Made:** 2015

**Recommendation:** In order to strengthen the Drug Enforcement Administration's (DEA) communication with and guidance for registrants and associations representing registrants, as well as supporting the Office of Diversion Control's mission of preventing diversion while ensuring an adequate and uninterrupted supply of controlled substances for legitimate medical needs, the Deputy Assistant Administrator for the Office of Diversion Control should solicit input from distributors, or associations representing distributors, and develop additional guidance for distributors regarding their roles and responsibilities for suspicious orders monitoring and reporting.

**Action Needed:** DEA did not agree or disagree with this recommendation. DEA raised concerns, stating that “short of providing arbitrary thresholds to distributors”, it cannot provide more specific suspicious orders guidance “because the variables that indicate a suspicious order differ among distributors and their customers.” In September 2019, DEA told us that the agency had refocused its efforts on revising draft regulations in line with the Substance Use-Disorder Prevention that Promotes Opioid Recovery and Treatment for Patients and Communities Act.<sup>8</sup> On November 2, 2020, DEA published a notice of proposed rulemaking entitled *Suspicious Orders of Controlled Substances*.<sup>9</sup> DEA reports that the proposed rule (1) codifies existing legal obligations related to due diligence and suspicious order monitoring and reporting; and (2) provides additional guidance regarding the nature and timing of the reporting requirement. The proposed rule provided an opportunity for the public, including distributors, to submit comments to DEA.

As of February 2025, DEA reported that the suspicious orders regulation remained in the internal deliberative process, as DEA was addressing questions from the Department of Justice’s (DOJ) Office of Legal Policy. DEA provided a goal time frame of October 2025 for publishing the final rule. To fully implement this recommendation, DEA needs to publish the final rule and ensure that it includes additional guidance for distributors regarding their roles and responsibilities for suspicious orders monitoring and reporting. Improved DEA guidance and communication with registrants may address some of the concerns from these registrants about their roles and responsibilities. It will also help registrants make business decisions that balance ensuring access for patients with legitimate needs with controlling abuse and diversion.

**High-Risk Area:** [National Efforts to Prevent, Respond to, and Recover from Drug Misuse](#)

**Director:** Alyssa M. Hundrup, Health Care  
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**Director:** Triana McNeil, Homeland Security and Justice  
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**Efforts to Combat Money Laundering**

*Anti-Money Laundering: Better Information Needed on Effectiveness of Federal Efforts.* [GAO-24-106301](#). Washington, D.C.: February 8, 2024.

**Year Recommendation Made:** 2024

**Recommendation:** The Attorney General should lead an effort, in coordination with the Departments of Homeland Security and the Treasury, to develop a methodology for producing government-wide data on the outcomes of anti-money laundering investigations. This effort could be conducted in conjunction with the interagency working group DOJ was directed to form in the joint explanatory statement accompanying its fiscal year 2023 appropriation<sup>10</sup>.

**Action Needed:** DOJ agreed with the recommendation. In late 2024, DOJ informed us that it is taking steps to implement this recommendation, in large part through the Organized Crime Drug

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<sup>8</sup>Pub. L. No. 115-271, § 3292, 132 Stat. 3894, 3956-58 (2018).

<sup>9</sup>Drug Enforcement Administration, *Suspicious Orders of Controlled Substances*, 85 Fed. Reg. 69282 (proposed November 2, 2020) (to be codified at 21 C.F.R. pt. 1300 and 1301).

<sup>10</sup>Joint Explanatory Statement Accompanying the Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, H. Rept. No. 50-347, Divisions A-F, at p. 286.

Enforcement Task Forces' (OCDETF) interagency relationships and management information system—a data management and performance analytics system that integrates data from OCDETF member agencies (which include Homeland Security, Justice, and Treasury components).<sup>11</sup> For example, OCDETF has initiated efforts to standardize and integrate data-sharing protocols, including drafting agreements to facilitate the secure sharing and mapping of data. Its next steps include (1) analyzing agency data points to streamline collection and integration processes, (2) mapping data from multiple sources to standardized forms and aligning agency data interfaces, and (3) collaborating with partners to test integration and refine data collection systems. According to OCDETF, the vision is to build a unified governmentwide database that supports robust evaluation of anti-money laundering and other investigative outcomes.

In February 2025, DOJ and OCDETF informed us they are continuing to make progress. For example, through an initial assessment, they identified data that OCDETF's partner agencies can add to their systems, which then can be automatically transferred and mapped to OCDETF forms and systems. DOJ and OCDETF also have continued to collaborate with agency partners on other steps but have encountered resource challenges. Completing the work to build a unified governmentwide database would reduce fragmented data collection, yield better information on the effectiveness of federal efforts to combat money laundering, and help identify ways to improve anti-money laundering strategies.

**Director:** Michael E. Clements, Financial Markets and Community Investment

**Contact information:** [ClementsM@gao.gov](mailto:ClementsM@gao.gov)

**Director:** Triana McNeil, Homeland Security and Justice

**Contact information:** [McNeilT@gao.gov](mailto:McNeilT@gao.gov)

### Information Technology and Cybersecurity

*Privacy: Dedicated Leadership Can Improve Programs and Address Challenges.* [GAO-22-105065](#). Washington, D.C.: September 22, 2022.

**Year Recommendation Made:** 2022

**Recommendation:** The Attorney General should incorporate privacy into an organization-wide risk management strategy that includes a determination of risk tolerance.

**Action Needed:** DOJ did not concur with this recommendation. DOJ stated that its existing strategy documents address how it manages privacy risk, including a determination of risk tolerance. However, documentation provided by DOJ did not explicitly discuss the department's approach to determining privacy risk tolerance, including, for example, factors to be considered and acceptable amounts of risk.

As of February 2025, DOJ officials told us they drafted a new privacy risk management strategy that includes the elements called for in our recommendation and are working to finalize it.

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<sup>11</sup>OCDETF is an independent component of DOJ. Established in 1982, OCDETF uses a prosecutor-led, multiagency approach to enforcement to carry out DOJ's strategy to combat transnational organized crime and reduce the availability of illicit narcotics in the nation.

Agency officials told us they expect to finalize it in the upcoming weeks, pending internal review and approval.

To fully address our recommendation, DOJ needs to include an explicit discussion of privacy, including its approach to risk tolerance, in its risk management strategy. Doing so would assist DOJ in ensuring that it is managing privacy risks within acceptable thresholds.

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

**Director:** Marisol Cruz Cain, Information Technology and Cybersecurity

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*Federal Software Licenses: Agencies Need to Take Action to Achieve Additional Savings.* [GAO-24-105717](#). Washington, D.C.: January 29, 2024.

**Year Recommendation Made:** 2024

**Recommendation:** The Attorney General should ensure that DOJ consistently compares the inventories of software licenses that are currently in use with information on purchased licenses to identify opportunities to reduce costs and better inform investment decision making for its widely used licenses on a regular basis. At a minimum, it should develop and implement procedures for comparing the inventories of licenses in use to purchase records.

**Action Needed:** DOJ agreed with this recommendation. DOJ developed departmental standards and procedures in August 2024 for tracking license usage and reconciling licenses in use against financial records. To fully implement this recommendation, DOJ needs to demonstrate that it has implemented these procedures to compare its inventory of software licenses with known purchases for its widely used licenses on a regular basis. Until doing so, the department may miss opportunities to reduce costs on duplicative or unnecessary licenses.

**High-Risk Area:** [Improving IT Acquisitions and Management](#)

**Potential Financial Benefit if Implemented:** A Million or More

**Director:** Carol Harris, Information Technology and Cybersecurity

**Contact Information:** [HarrisCC@gao.gov](mailto:HarrisCC@gao.gov)

**Public Safety Officers' Benefits Program**

*Public Safety Officers' Benefits Program: Transparency, Claims Assistance, and Program Management Improvements Needed.* [GAO-24-105549](#). Washington, D.C.: September 27, 2024.

**Year Recommendations Made:** 2024

**Recommendation:** The Attorney General should ensure that the Director of the Bureau of Justice Assistance document and implement a comprehensive program performance management process. As part of this plan, the agency should:

- Establish long-term strategic goals and short-term performance goals;

- establish an oversight strategy for monitoring program activities to identify problems, determine corrective actions, identify lessons learned, and adopt new approaches; and
- improve the collection and management of Public Safety Officers' Benefits program (PSOB) data to better ensure its accuracy, consistency, and completeness for assessing program performance.

**Action Needed:** DOJ agreed with this recommendation. DOJ anticipated documenting its efforts and plans to develop long- and short-term goals, monitor its program activities, and ensure the accuracy, consistency and completeness of program data used to assess program performance by May 2025. In February 2025, DOJ reported PSOB is continuing its efforts to document and implement a comprehensive program performance management plan. DOJ stated the plan is expected to address the elements of our recommendations and estimated that it will be completed by May 31, 2025. Implementing a comprehensive program performance management process with goals, quality data, and monitoring process will better position PSOB to manage its program.

**Recommendation:** The Attorney General should direct the Director of the Bureau of Justice Assistance to document procedures for carrying out PSOB claims management and administrative procedures.

**Action Needed:** DOJ agreed with this recommendation. In September 2024, stated that PSOB's claims management and administrative procedures were under development and estimated to be complete by March 2025. In February 2025, DOJ reported PSOB is developing a set of standard operating procedures for carrying out PSOB claims management and administrative procedures and that they were under review by program leadership. DOJ estimated that the procedures would be finalized by the end of March 2025. Having documented procedures will help ensure PSOB's claims are being processed in a consistent and timely manner.

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## Enclosure 2

### Key Information About the Status of GAO Recommendations and Improving Agency Operations

#### Department of Justice's Recommendation Implementation Rate

In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.<sup>12</sup> DOJ's recommendation implementation rate was 95 percent. As of April 2025, DOJ had 107 open recommendations.

#### Implemented, Closed, and New Priority Recommendations

Our May 2024 letter to Attorney General Garland and others identified 15 priority recommendations.<sup>13</sup> Since then, one recommendation was implemented, none were closed as no longer valid, and we added three new priority recommendations.

**Implemented recommendation:** In June 2024, the Executive Office for Immigration Review implemented our 2017 recommendation to develop a strategic workforce plan. The agency took steps, such as conducting an agencywide skills gap analysis and setting goals and measures to evaluate the agency's progress towards its human capital goals.<sup>14</sup> By doing so, the agency should be better positioned to address current and future staffing needs for overseeing immigration courts.

**New priority recommendations:** The three new priority recommendations are related to the efforts to combat money laundering and Public Safety Officers' Benefits Program areas. (See Enclosure 1.)

#### Financial Statement Audit

As the auditor of the consolidated financial statements of the U.S. government, I have noticed that the Department of Justice had one material weakness in its internal control over financial reporting for fiscal year 2024, including deficiencies related to risk assessment and monitoring. This weakness, as well as related auditor recommendations, is an important issue and I encourage you to address it.

#### High-Risk List

In February 2025, we issued our biennial update to our [High-Risk List](#).<sup>15</sup> This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement.

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<sup>12</sup>GAO, *Performance and Accountability Report: Fiscal Year 2024*, [GAO-25-900570](#) (Washington, D.C.: Nov. 15, 2024).

<sup>13</sup>GAO, *Priority Recommendations: Department of Justice*, [GAO-24-107248](#) (Washington, D.C.: May 29, 2024).

<sup>14</sup>GAO, *Immigration Courts: Actions Needed to Reduce Case Backlog and Address Long-Standing Management and Operational Challenges*, [GAO-17-438](#) (Washington, D.C.: June 1, 2017).

<sup>15</sup>GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, D.C.: February 25, 2025).

It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges.

One of our high-risk areas—[national efforts to prevent, respond to, and recover from drug misuse](#)—focuses directly on DOJ and other agencies. In addition, we added a new area in 2023, [strengthening management of the federal prison system](#), which is directly under DOJ’s purview.

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

The department continues to experience challenges presented by maintaining cybersecurity and keeping pace with emerging technology. These include addressing cyber supply chain threats; combatting cybercrime and cyber threats, such as ransomware; enhancing the cyber workforce, and managing risks associated with emerging technologies such as AI. Meeting these challenges includes, among other things, addressing related recommendations from the department’s office of the inspector general.<sup>16</sup>

In addition to DOJ’s high-risk area, we urge your continued attention to the other government-wide, high-risk issues as they relate to DOJ. 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 DOJ. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.<sup>17</sup>

### **Congress’s Role on GAO Recommendations**

We also recognize the key role Congress plays 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.<sup>18</sup>

Congress can use various strategies to address 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 DOJ’s progress in

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<sup>16</sup>U.S. Department of Justice Office of the Inspector General, *Top Management and Performance Challenges Facing the Department of Justice*, (Washington, D.C.: October 10, 2024).

<sup>17</sup>GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

<sup>18</sup>James 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)).

implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can 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 can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.