



July 2021

# COVID-19

## The Coast Guard Has Addressed Challenges, but Could Improve Telework Documentation and Personnel Data

# GAO@100 Highlights

Highlights of [GAO-21-539](#), a report to congressional addressees

## Why GAO Did This Study

The Coast Guard is a multi-mission maritime military service responsible for maritime safety, security, and environmental protection, among other things. During the pandemic, the Coast Guard has faced challenges in balancing the need to safeguard its personnel with its responsibility to continue missions and operations.

In response to a CARES Act mandate and congressional requests, GAO reviewed the Coast Guard's efforts to respond to the pandemic. This report examines (1) the Coast Guard's actions to reduce the risk of COVID-19 exposure for its personnel; (2) challenges the Coast Guard faced in operating in a pandemic environment and how it addressed them; and (3) the extent to which the Coast Guard has collected and maintained valid and current telework documentation, as well as accurate and complete COVID-19 data on its personnel.

GAO reviewed Coast Guard COVID-19 policies and guidance, interviewed officials from headquarters and a non-probability sample of nine Coast Guard sectors, and analyzed data on the status of Coast Guard personnel during the COVID-19 pandemic.

## What GAO Recommends

GAO recommends the Coast Guard ensure that (1) personnel have valid telework agreements in place, (2) these agreements are reviewed at least annually, and (3) weekly audits are conducted to verify the status of personnel. The Department of Homeland Security concurred with these recommendations.

View [GAO-21-539](#). For more information, contact Heather MacLeod at (202) 512-8777 or [macleodh@gao.gov](mailto:macleodh@gao.gov).

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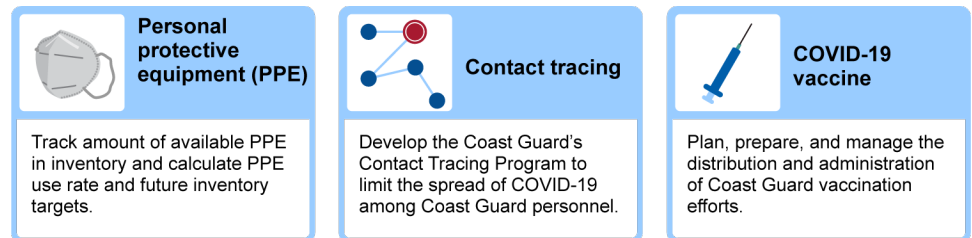
## COVID-19

### The Coast Guard Has Addressed Challenges, but Could Improve Telework Documentation and Personnel Data

## What GAO Found

The U.S. Coast Guard took steps to safeguard its personnel during the COVID-19 pandemic by updating its policies and guidance, expanding telework, and administering COVID-19 vaccines, among other efforts. For example, the Coast Guard formed a COVID-19 Crisis Action Team comprising targeted working groups to address COVID-19-related issues and develop new policies and guidance. Further, from December 2020 through April 2021, the Coast Guard administered vaccines to 35,439 (about 64 percent) of its personnel.

#### Selected U.S. Coast Guard COVID-19 Crisis Action Team Working Groups



Source: GAO analysis of U.S. Coast Guard documentation. | [GAO-21-539](#)

The Coast Guard also took actions to address a variety of challenges posed by the COVID-19 pandemic. For example, officials from all nine sectors (i.e., operational field units) we interviewed identified challenges with information technology system functionality when the Coast Guard expanded telework in March 2020. This included insufficient network bandwidth and a lack of laptop computers. To address these challenges, the Coast Guard increased network bandwidth to allow more simultaneous users and provided additional laptops to field offices. In addition, the Coast Guard faced other challenges during the pandemic, including ensuring personnel continued to receive necessary training and on-the-job experience.

GAO found that the Coast Guard lacks controls over telework documentation and its personnel data are not reliable. First, the Coast Guard expanded its telework program during the pandemic, but lacks controls to ensure that teleworking personnel have valid and current telework agreements in place. Officials told us that high levels of participation in its telework program may continue following the pandemic. Thus, ensuring that all personnel who telework have valid and current telework agreements in place will provide the Coast Guard with the information needed to make decisions that require telework data, such as for space planning or technology investments. Second, the Coast Guard modified its personnel system to allow personnel to self-report and update their COVID-19 and telework statuses. GAO analyzed these data from April 2020 through April 2021 and found they were not reliable due to missing data and concerns about accuracy. In particular, Coast Guard officials could not provide assurance or evidence that weekly audits purposefully designed to verify the accuracy and completeness of these data were being conducted. Without such assurance, the Coast Guard may be relying on inaccurate and incomplete information when making decisions that rely on these data, such as for assessing its operational readiness.

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# Contents

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Letter		1
	Background	5
	The Coast Guard Has Taken Steps to Safeguard Personnel and Continue Its Missions during the COVID-19 Pandemic	8
	The Coast Guard Took Actions to Address a Variety of Challenges Posed by the COVID-19 Pandemic	17
	The Coast Guard Lacks Controls over Telework Documentation and Its Data on the COVID-19 and Telework Statuses of its Personnel Are Not Reliable	29
	Conclusions	37
	Recommendations for Executive Actions	38
	Agency Comments and Our Evaluation	39
Appendix I	Results of Interviews with Nine Coast Guard Sector Command-Level Officials	43
Appendix II	Comments from the Department of Homeland Security	47
Appendix III	GAO Contact and Staff Acknowledgments	50
Tables		
	Table 1: The U.S. Coast Guard's 11 Statutory Missions	7
	Table 2: U.S. Coast Guard Workforce, by Personnel Type, as of April 30, 2021	8
	Table 3: Information on the U.S. Coast Guard Personnel System's COVID-19 and Telework Status Modules	33
Figures		
	Figure 1: Map of the U.S. Coast Guard's Two Area Commands, Nine Districts, and 37 Sectors	6
	Figure 2: Information on Selected U.S. Coast Guard COVID-19 Crisis Action Team Working Groups and Their Responsibilities	9
	Figure 3: Timeline of Selected Events and U.S. Coast Guard Guidance and Policies to Address the COVID-19 Pandemic	12

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Figure 4: Examples of U.S. Coast Guard Procedural Adjustments to Mitigate the Risk of COVID-19 Exposure for Its Personnel	14
Figure 5: COVID-19 Pandemic-Related Challenges Cited by U.S. Coast Guard Officials	17
Figure 6: U.S. Coast Guard Personnel Assisting an Individual to Disembark from a Cruise Ship Tender during the COVID-19 Pandemic	22
Figure 7: Map of the Nine Coast Guard Sectors Included in our Content Analysis of COVID-19 Challenges	43
Figure 8: Results of our Content Analysis of Challenges Cited during Interviews Conducted with Officials from Nine Coast Guard Sectors	45

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## Abbreviations

CDC	U.S. Centers for Disease Control and Prevention
COVID-19	Coronavirus Disease 2019
DHS	Department of Homeland Security
IT	information technology
PPE	personal protective equipment
VDI	virtual desktop infrastructure
VPN	virtual private network

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July 16, 2021

### Congressional Addressees

The U.S. Coast Guard—a multi-mission, maritime military service within the Department of Homeland Security (DHS)—is responsible for conducting 11 statutory missions.<sup>1</sup> These include protecting and defending more than 95,000 miles of U.S. coastline and inland waterways, safeguarding an economic region covering 4.5 million square miles, and assisting people in distress or affected by natural and human-made disasters.

The effects of the Coronavirus Disease 2019 (COVID-19) pandemic have been devastating and resulted in catastrophic loss of life. As of mid-June 2021, about 33.4 million cases and about 593,000 deaths had been reported in the U.S.<sup>2</sup> COVID-19 has also generated unprecedented challenges for federal agencies tasked with addressing the pandemic's effects while continuing to carry out their missions. The Coast Guard has faced such challenges, including in balancing its obligation to safeguard

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<sup>1</sup>The Coast Guard's 11 statutory missions were originally outlined in the Homeland Security Act of 2002, Pub. L. No. 107-296, § 888, 116 Stat. 2249, and include: marine safety; search and rescue; aids to navigation; living marine resources; marine environmental protection; ice operations; ports, waterways, and coastal security; drug interdiction; migrant interdiction; defense readiness; and other law enforcement. 6 U.S.C. § 468(a).

<sup>2</sup>Data on case counts are through June 18, 2021. Data on COVID-19 cases in the U.S. are based on aggregate case reporting to the U.S. Centers for Disease Control and Prevention (CDC) and include probable and confirmed cases as reported by states and jurisdictions. CDC COVID-19 counts are subject to change due to delays or updates in reported data from states and territories. According to CDC, the actual number of COVID-19 cases is unknown for a variety of reasons, including that people who have been infected may have not been tested or may have not sought medical care. See CDC, "COVID Data Tracker: Trends in Number of COVID-19 Cases and Deaths in the U.S. Reported to CDC, by State/Territory," accessed June 24, 2021, [https://covid.cdc.gov/covid-data-tracker/#trends\\_dailytrendscases](https://covid.cdc.gov/covid-data-tracker/#trends_dailytrendscases).

The number of deaths (about 593,000) include total deaths that occurred through the week ending June 19, 2021. CDC's National Center for Health Statistics COVID-19 death counts in the U.S. are based on provisional counts from death certificate data, which do not distinguish between laboratory-confirmed and probable COVID-19 deaths. Provisional counts are incomplete due to an average delay of 2 weeks (a range of 1–8 weeks or longer) for death certificate processing. See CDC, National Center for Health Statistics, "Provisional Death Counts for Coronavirus Disease 2019 (COVID-19)," accessed June 24, 2021, <https://www.cdc.gov/nchs/nvss/vsrr/covid19/index.htm>.

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approximately 55,500 active duty, reserve, and civilian personnel from COVID-19 exposure with its responsibility to continue conducting its statutory missions. To help achieve this balance, the Coast Guard implemented new COVID-19 protocols and expanded the use of telework to reduce the risk of COVID-19 exposure for its personnel and ensure its workforce remains mission ready. According to Coast Guard data, the Coast Guard had a total of at least 2,982 confirmed COVID-19 cases and three reported deaths as of April 30, 2021.

The CARES Act includes a provision for GAO to report on its ongoing monitoring and oversight efforts related to the COVID-19 pandemic.<sup>3</sup> This report is part of our body of work in response to the CARES Act and requests from the chairs of the House Homeland Security Committee and the House Transportation and Infrastructure Committee, who asked us to review the Coast Guard's efforts in response to the COVID-19 pandemic.<sup>4</sup>

This report addresses (1) the steps the Coast Guard has taken to reduce the risk of its personnel being exposed to COVID-19, and to ensure its ability to continue conducting statutory missions; (2) the challenges the Coast Guard has faced in operating in a pandemic environment and how it has addressed them; and (3) the extent to which the Coast Guard has collected and maintained valid telework documentation, as well as accurate data on how COVID-19 is affecting its personnel.

To address our first and second objectives, we reviewed relevant pandemic-related Coast Guard documentation from January 2020 through April 2021, including its *Novel Coronavirus (COVID-19) Planning Order*, *COVID-19 Agile Workforce Guide*, *Contact Tracing in the Coast Guard Guide*, weekly COVID-19 leadership briefings, Marine Safety Information Bulletins, and communications sent to all Coast Guard personnel, called ALCOAST messages.<sup>5</sup> We also obtained information on

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<sup>3</sup>Pub. L. No. 116-136, Title IX, § 19010, 134 Stat. 579.

<sup>4</sup>We regularly issue government-wide reports on the federal response to COVID-19. For the latest report, see GAO, *COVID-19: Sustained Federal Action Is Crucial as Pandemic Enters Its Second Year*, GAO-21-387 (Washington, D.C.: Mar. 31, 2021). Our next government-wide report will be issued on July 19, 2021, and will be available on GAO's website at <https://www.gao.gov/coronavirus>.

<sup>5</sup>ALCOAST messages are generally administrative-type directives that communicate an urgent policy change or update to all Coast Guard personnel. Marine Safety Information Bulletins are publicly available on the Coast Guard's website and contain information on updates to Coast Guard guidance and responses to events affecting the maritime transportation industry.

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key aspects of the Coast Guard's COVID-19 response, including the number of training classes the Coast Guard provided virtually during the pandemic and the number of personnel the Coast Guard vaccinated from December 2020 through April 2021.

We also analyzed efforts the Coast Guard took to communicate COVID-19-related information internally and coordinate externally with other federal agencies, state and local governments, and maritime industry stakeholder organizations. We also interviewed Coast Guard headquarters officials in the COVID-19 Crisis Action Team, Office of Health Services, Office of Emergency Management, and the Prevention Directorate. In addition, we interviewed Coast Guard officials responsible for managing the Coast Guard's training program, information technology (IT) systems, telework program, and COVID-19 vaccination efforts. Further, we interviewed officials from five maritime industry stakeholder organizations to determine the extent to which they coordinated with the Coast Guard during the COVID-19 pandemic.<sup>6</sup>

To address our second objective, we selected a non-probability sample of nine of the 37 Coast Guard sectors (i.e., operational field units) that included one sector from each of the nine Coast Guard districts, to ensure our sample would be geographically diverse and encompass a range of Coast Guard operations and mission activities.<sup>7</sup> Next, we conducted semi-structured interviews with officials from these nine sectors to ask the same questions and obtain the same types of information across all interviews. Although the information obtained from these interviews is not generalizable to all 37 Coast Guard sectors, it provided insights into the range of challenges these sectors faced during the COVID-19 pandemic. An analyst on the review team assessed the information obtained in the sector interviews to identify common challenges and developed a list of categories to capture the various types of challenges cited by sector

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<sup>6</sup>We interviewed officials from the following organizations: American Association of Port Authorities, American Waterways Operators, Cruise Lines International Association, National Association of Waterfront Employers, and the Passenger Vessel Association. We selected these organizations based on their experience operating in the maritime domain and their regular interaction with the Coast Guard.

<sup>7</sup>The nine Coast Guard sectors we selected were: Anchorage, Columbia River, Detroit, Honolulu, Key West, New York, Ohio Valley, San Diego, and Virginia.

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officials.<sup>8</sup> A second analyst from the review team then reviewed and finalized this list of categories and the challenges within each category. Next, a team analyst reviewed and coded the information in each interview into one of the categories and a second team analyst independently verified these codes and the testimonial evidence used to support them. The two analysts then reconciled any differences. For more information on COVID-19 challenges specifically cited by Coast Guard officials from the nine sectors we interviewed, see appendix I.

To address our third objective, we reviewed Coast Guard telework program guidance and relevant ALCOAST messages.<sup>9</sup> We also interviewed officials familiar with the Coast Guard telework program to determine how COVID-19 had affected the program and identify program requirements for participating personnel and their supervisors. We compared this information against the Telework Enhancement Act of 2010,<sup>10</sup> the Office of Personnel Management's telework guidance,<sup>11</sup> and key aspects of *Standards for Internal Control in the Federal Government*.<sup>12</sup> We determined that documentation requirements of internal control standards were significant to this objective and assessed the Coast Guard's policies and procedures on telework to determine whether the Coast Guard collected and maintained telework documentation, including annual reviews of telework agreements.

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<sup>8</sup>We did not independently verify statements made by Coast Guard sector officials we interviewed. The results of these interviews are not generalizable and may not be indicative of officials' perspectives across all Coast Guard sectors. However, they provided us with informative perspectives from frontline personnel on challenges Coast Guard sector officials faced during the COVID-19 pandemic. Further, sector officials provided information on challenges they faced during the pandemic in response to our open-ended interview questions. As a result, while sector officials may not have specifically cited a selected challenge during our interviews, this does not necessarily mean their sectors did not experience that challenge during the COVID-19 pandemic.

<sup>9</sup>Coast Guard, *Coast Guard Telework Program: Commandant Instruction 5330.4*, Jan. 29, 2014.

<sup>10</sup>Pub. L. No. 111-292, 124 Stat. 3165 (Dec. 9, 2010), codified primarily at chapter 65 of title 5, United States Code.

<sup>11</sup>Office of Personnel Management, *Guide to Telework in the Federal Government* (Washington, D.C.: April 2011).

<sup>12</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).



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We also obtained and analyzed selected data from the Coast Guard Personnel Accountability and Assessment System from April 2020 through April 2021. Specifically, in April 2020, the Coast Guard began regularly collecting data on personnel's COVID-19 status—whether they are affected by COVID-19—and their telework status—whether they are teleworking more than 50 percent of the time. We reviewed existing information about this personnel system, conducted manual checks of system data, and interviewed data users and officials responsible for managing the data. We also reviewed documentation and interviewed cognizant officials to discuss the Coast Guard's process for collecting and verifying these data and to determine how the Coast Guard and DHS have used the data during the COVID-19 pandemic. Based on these steps, we determined these data were not reliable for the purpose of reporting on the COVID-19 and telework statuses of Coast Guard personnel due to missing data and concerns about accuracy. We discuss the reliability of these data later in our report. We also compared this information against Coast Guard policy and key aspects of federal internal control standards.<sup>13</sup> The control activities component of these standards was significant to this objective and we assessed the Coast Guard's process for collecting and verifying these data to determine whether it provided reasonable assurance regarding the data's accuracy and completeness.

We conducted this performance audit from June 2020 to July 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit.

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## Background

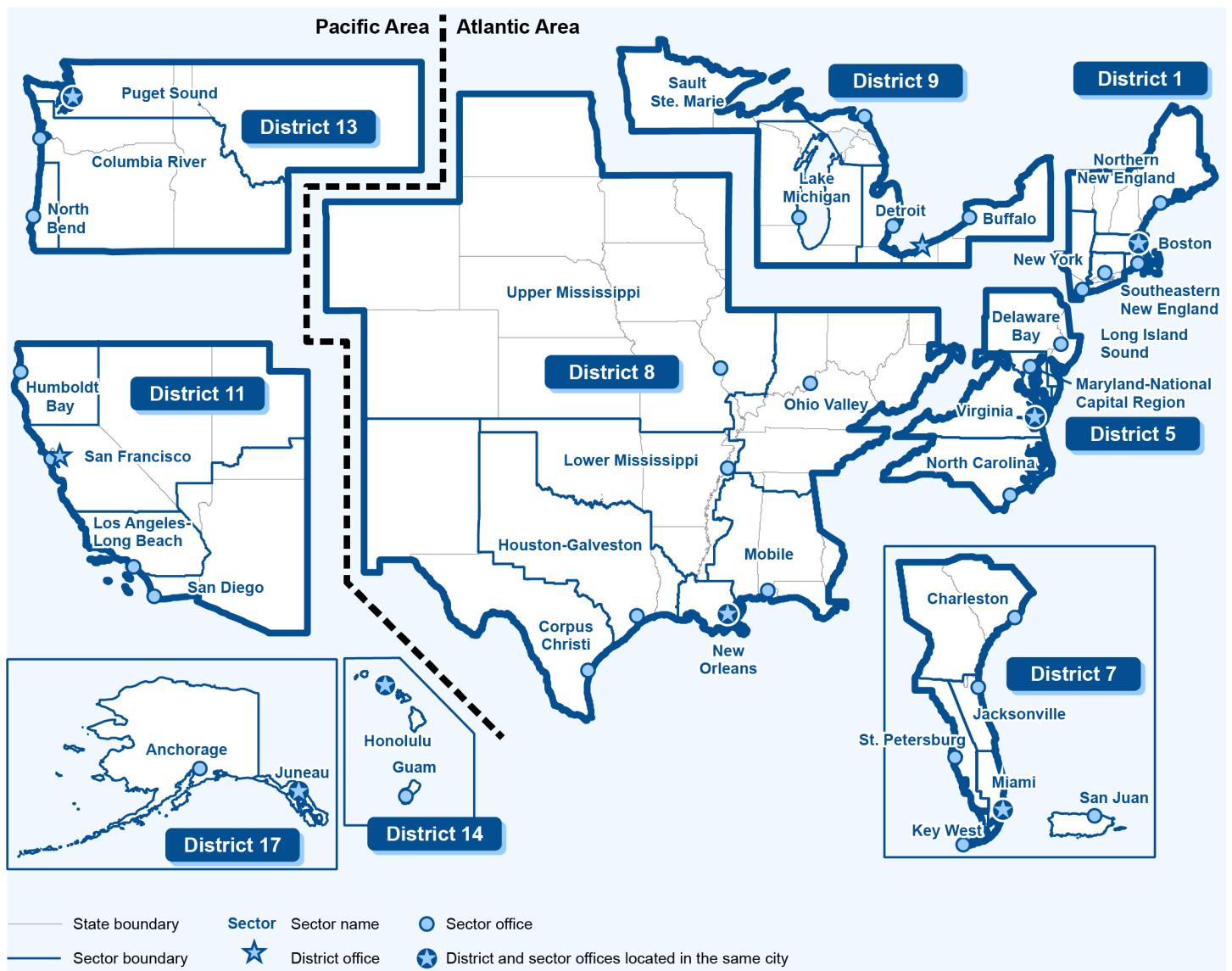
### Coast Guard Field Structure

The Coast Guard's field structure is organized under two area commands, the Atlantic and Pacific Area Commands. These two commands oversee nine districts across the U.S., which, in turn, collectively oversee 37 sectors, as shown in figure 1. Each Coast Guard area, district, and sector is responsible for managing its assets and accomplishing missions within its area of responsibility.

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<sup>13</sup>[GAO-14-704G](#).

**Figure 1: Map of the U.S. Coast Guard's Two Area Commands, Nine Districts, and 37 Sectors**



Source: GAO analysis of U.S. Coast Guard data. | GAO-21-539

## Coast Guard Statutory Missions

The Coast Guard is responsible for conducting the 11 statutory missions outlined in federal law.<sup>14</sup> Table 1 provides an overview of these missions.

**Table 1: The U.S. Coast Guard’s 11 Statutory Missions**

Statutory mission	Mission description
Marine Safety	Enforce laws that prevent death, injury, and property loss in the marine environment.
Search and Rescue	Search for, and provide aid to, people who are in distress or imminent danger in the maritime environment.
Aids to Navigation	Mitigate the risk to safe navigation by providing and maintaining more than 51,000 buoys, beacons, lights, and other aids to mark channels and denote hazards.
Living Marine Resources	Enforce laws governing the conservation, management, and recovery of living marine resources, marine protected species, and national marine sanctuaries and monuments.
Marine Environmental Protection	Enforce laws that deter the introduction of invasive species into the maritime environment, stop unauthorized ocean dumping, and prevent and respond to oil and chemical spills.
Ice Operations	Establish and maintain tracks for critical waterways, assist and escort vessels beset or stranded in ice, and remove navigational hazards created by ice in navigable waterways.
Ports, Waterways, and Coastal Security	Ensure the security of the waters subject to the jurisdiction of the United States and the waterways, ports, and intermodal landside connections that comprise the marine transportation system, and protect those who live or work on the water or who use the maritime environment for recreation.
Drug Interdiction	Stem the flow of illegal drugs into the United States via maritime routes.
Migrant Interdiction	Stem the flow of unlawful migration and human smuggling activities via maritime routes.
Defense Readiness	Maintain the training and capability necessary to immediately integrate with Department of Defense forces in both peacetime operations and during times of war.
Other Law Enforcement	Enforce international treaties, including the prevention of illegal fishing in international waters.

Source: GAO presentation of U.S. Coast Guard information. | GAO-21-539

Note: The Coast Guard is responsible for conducting the 11 statutory missions outlined in federal law. 6 U.S.C. § 468(a).

## Coast Guard Workforce

The Coast Guard workforce included approximately 55,500 active duty, reserve, and civilian personnel as of April 30, 2021.<sup>15</sup> These include, for example, operational field staff responsible for conducting the statutory missions outlined in Table 1—such as search and rescue activities and law enforcement operations—and mission support personnel responsible for managing Coast Guard policy, planning, and logistics to meet mission

<sup>14</sup>6 U.S.C. § 468(a).

<sup>15</sup>Members of the Coast Guard Auxiliary Force are not included in this number. These personnel represent Coast Guard uniformed personnel who volunteer their time and maritime experience in support of Coast Guard missions and operations.

needs.<sup>16</sup> Table 2 provides more information on the Coast Guard workforce, by personnel type.

**Table 2: U.S. Coast Guard Workforce, by Personnel Type, as of April 30, 2021**

Personnel type	Description	Number of personnel
Active duty	Full-time military personnel responsible for carrying out the Coast Guard's 11 statutory missions.	40,518
Reserve duty <sup>a</sup>	Part-time military personnel trained and qualified to take duty in times of war or national emergency, and to augment Coast Guard forces and provide surge capacity to respond to natural or human-made disasters, accidents, and all other hazards.	6,139
Civilian	Full-time, non-military personnel supporting the Coast Guard's missions.	8,877
<b>Total</b>		<b>55,534</b>

Source: GAO analysis of Coast Guard documentation and data. | GAO-21-539

Note: Members of the Coast Guard Auxiliary force are not included in this table. These personnel represent Coast Guard uniformed personnel who volunteer their time and maritime experience in support of Coast Guard missions and operations.

<sup>a</sup>Coast Guard reserve personnel are required to participate in part-time training activities each year. These personnel may be ordered to active duty status to meet the Coast Guard's operational needs.

## The Coast Guard Has Taken Steps to Safeguard Personnel and Continue Its Missions during the COVID-19 Pandemic

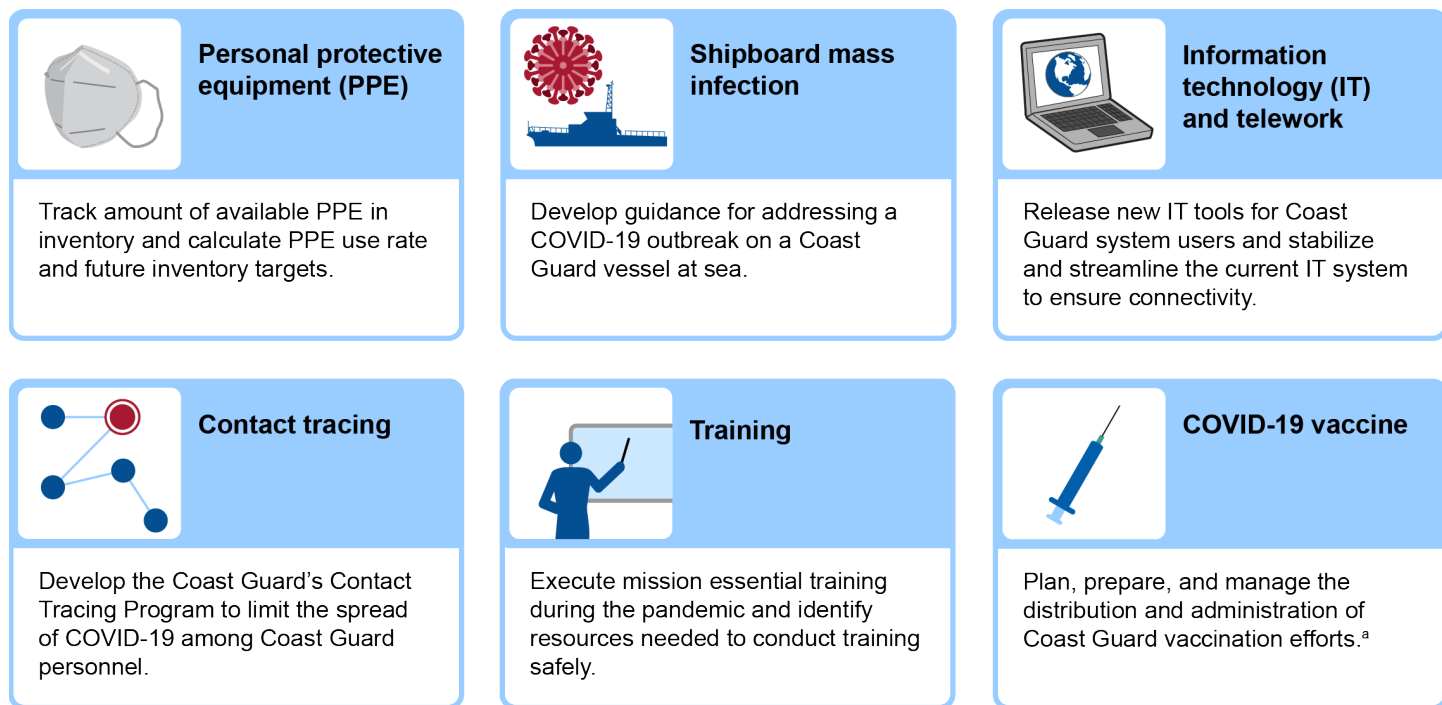
### The Coast Guard Formed a Crisis Action Team and Developed New Policies and Guidance

In March 2020, the Coast Guard formed a COVID-19 Crisis Action Team to develop and synchronize Coast Guard policies and guidance focused on assisting its personnel to continue safely and effectively conducting their missions during the pandemic. The Crisis Action Team consists of working groups focused on addressing specific aspects of the Coast

<sup>16</sup>As we discuss later in this report, certain Coast Guard positions are not conducive to telework. For example, Coast Guard personnel working as cutter crew members or conducting search and rescue activities are generally not able to telework.

Guard’s pandemic response (see fig. 2).<sup>17</sup> For example, the contact tracing working group developed policies, guidance, and tools for implementing the Coast Guard’s Contact Tracing Program, which is intended to limit the spread of COVID-19 among personnel. Among other things, this working group focused on how to incorporate necessary privacy protections for different types of Coast Guard personnel (i.e., active duty, civilian, and reserve personnel) into its policy, according to Coast Guard officials.

**Figure 2: Information on Selected U.S. Coast Guard COVID-19 Crisis Action Team Working Groups and Their Responsibilities**



Source: GAO analysis of U.S. Coast Guard documentation. | GAO-21-539

<sup>a</sup>In November 2020, the COVID-19 vaccine working group transitioned to the COVID-19 Vaccine Incident Command.

The Coast Guard developed and issued numerous and timely COVID-19 guidance documents during the pandemic. These guidance documents

<sup>17</sup>Crisis Action Team officials told us that the team started with six working groups in March 2020 and expanded to over 30 working groups during the pandemic. These working groups consist of around 250 full-time personnel from Coast Guard headquarters, according to these officials.

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addressed a variety of topics, but generally focused on how best to safeguard personnel and ensure its continued ability to conduct its missions. These included the *COVID-19 Planning Order*, messages sent to all Coast Guard personnel—called ALCOAST messages—and other relevant guidance. Crisis Action Team officials told us that the Coast Guard’s existing policies and guidance were not relevant or specific enough to address the unprecedented challenges they faced when the COVID-19 pandemic began. As a result, the Crisis Action Team updated or created policies and guidance to provide operational units with useful information on how to safely and effectively operate according to the conditions in their areas of operations. Officials from all nine sectors we interviewed stated that Coast Guard headquarters had provided relevant and timely guidance while also providing operational command-level officials discretion in implementing this guidance, as appropriate. For example, an official from one sector told us that the sector had the discretion and autonomy to decide how best to conduct operations based on the prevalence of COVID-19 and its associated risks in the sector’s area of responsibility.

**Coast Guard COVID-19 Planning Order.** On February 14, 2020, the Coast Guard published its *COVID-19 Planning Order* to provide Coast Guard personnel with a single source of information for planning, preparing for, and responding to missions and operational scenarios during the pandemic. The Coast Guard has regularly updated this document with new information on, among other topics, proper personal protective equipment (PPE) usage, risk mitigation procedures, and vaccine distribution efforts. For example, the *COVID-19 Planning Order* describes the process for determining whether an individual should quarantine or isolate for different types of scenarios, including after being exposed to a confirmed COVID-19 case, experiencing symptoms, or testing positive for COVID-19. In addition, it outlines how personnel are to report their statuses in the Coast Guard Personnel Accountability and Assessment System, which the Coast Guard uses to track how personnel are affected by COVID-19, as described later in the report.

**ALCOAST messages.** During the 15 months from January 2020 through April 2021, the Coast Guard issued 88 ALCOAST messages to all personnel with information and updates regarding Coast Guard operations and safety procedures during the pandemic. These messages included guidance on mass gatherings, alternative work schedules, telework, proper PPE usage, and travel and leave policies, among other topics. For example, in March 2020, a message outlined which statutory missions were priorities for personnel to continue conducting—such as

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search and rescue—and which missions could be deferred. The Coast Guard subsequently updated these priorities to reflect extended pandemic conditions in later messages sent in May and August 2020.

**Other relevant guidance.** The Coast Guard also developed or implemented additional guidance to address other aspects of the COVID-19 pandemic, such as a workforce guide and a vaccination prioritization framework. The *COVID-19 Agile Workforce Guide* is intended to help protect the Coast Guard workforce while ensuring mission readiness. For example, this guide provides a methodology for operational unit commanders to use for assessing the risk of COVID-19 and tailoring mitigation measures to local conditions. In addition, the Coast Guard administered vaccines using the Department of Defense’s prioritization framework, which aligns with the national framework issued by the U.S. Centers for Disease Control and Prevention (CDC).<sup>18</sup>

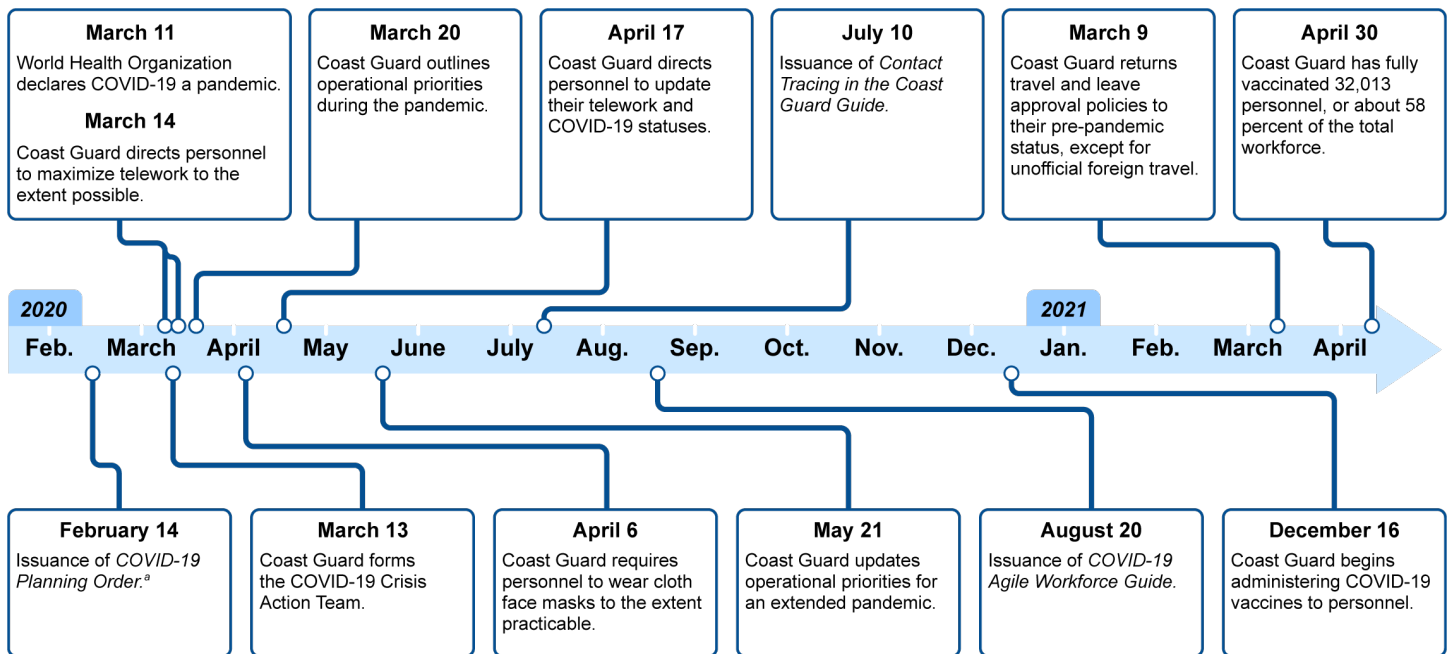
The Coast Guard took steps to issue this guidance and communicate other COVID-19-related information internally through virtual meetings, a COVID-19 website, and leadership briefings. Officials told us that early on in the pandemic (around March–May 2020), they held virtual, weekly town hall meetings to disseminate relevant information to all personnel. In addition, a town hall meeting in March 2021 focused on addressing issues and questions related to vaccine availability, viability, and distribution efforts. The Coast Guard also developed an internal website that has acted as a “one-stop shop” for communicating information and guidance regarding the pandemic to all of its personnel.

Figure 3 shows selected events and various guidance and policies the Coast Guard issued from February 2020 through April 2021.

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<sup>18</sup>The Department of Defense framework prioritized critical and mission essential personnel, including those working in health care, law enforcement, fire rescue, or search and rescue.

**Figure 3: Timeline of Selected Events and U.S. Coast Guard Guidance and Policies to Address the COVID-19 Pandemic**



Source: GAO analysis of U.S. Coast Guard documentation. | GAO-21-539

<sup>a</sup>The Coast Guard regularly updated the *COVID-19 Planning Order*.

## The Coast Guard Increased Workplace Flexibilities, Established COVID-19 Protocols, and Administered Vaccines

In March 2020, the Coast Guard began taking steps aimed at mitigating the risk of exposure for its personnel and ensuring its ability to continue conducting missions. These included expanding workplace flexibilities, such as telework and alternative work schedules, as well as implementing new COVID-19 protocols to mitigate the risk to personnel, including for those physically present in Coast Guard workplaces and those conducting statutory missions in the field. In addition, in mid-December 2020, the Coast Guard began administering vaccines to its personnel.

**Telework.** According to Coast Guard documentation, in March 2020, the Coast Guard implemented telework to the greatest extent possible for those personnel who are able to conduct their work remotely as a means to reduce the risk of COVID-19 exposure.<sup>19</sup> Coast Guard officials told us

<sup>19</sup>In March 2020, the Coast Guard modified its telework program in response to the COVID-19 pandemic to maximize telework and, in turn, minimize the number of Coast Guard personnel reporting to the workplace. These modifications also allowed certain eligible personnel to telework for 100 percent of their time. Prior to the COVID-19 pandemic, personnel had to report to a duty site at least twice during a pay period.



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that, as a result, participation in its telework program increased rapidly during the pandemic, adding that implementing telework helped to safeguard personnel and has proven to be a very useful tool. For example, Coast Guard officials from one sector we interviewed stated that they maximized telework for personnel who can effectively complete work activities remotely, such as personnel who primarily work on a computer.

**Work schedule adjustments.** Coast Guard officials told us that many positions—such as working in an emergency response center or as a cutter crew member—cannot be conducted remotely. As a result, the Coast Guard took steps to mitigate the risk of COVID-19 exposure for personnel who generally cannot telework. For example, the Coast Guard provided flexibility for modified work schedules, including allowing employees to work split shifts on different hours to decrease the number of individuals present in the workplace at any given time. Officials from one sector told us they adjusted the sector shift structure to form new work groups and implement staggered work shifts to mitigate the risk of exposure and help reduce the likelihood of any confirmed COVID-19 case within one group affecting another group.

**New COVID-19 workplace protocols.** The Coast Guard adjusted its physical workspaces and implemented new workplace protocols to mitigate the risk of COVID-19 exposure. These included: (1) requiring members to social distance when possible and wear cloth face coverings or masks when it was not, (2) installing sanitization stations in its offices, (3) shifting workstations further apart, and (4) installing barriers between workstations. Figure 4 highlights certain adjustments the Coast Guard made to mitigate the risk of COVID-19 exposure for its personnel.

**Figure 4: Examples of U.S. Coast Guard Procedural Adjustments to Mitigate the Risk of COVID-19 Exposure for Its Personnel**



Source: U.S. Coast Guard. | GAO-21-539

**New COVID-19 protocols for conducting Coast Guard missions.** The Coast Guard also implemented new protocols to safeguard its personnel while conducting statutory missions. Overall, the Coast Guard generally continued to conduct its statutory missions during the pandemic, while implementing changes to mitigate COVID-19 risks to its personnel. For example, personnel conducting search and rescue operations were required to wear different combinations of PPE according to the risk level associated with any given operation. In addition, Coast Guard headquarters provided operational commanders flexibility to defer certain missions and activities, when necessary. For example, in some cases, operational commanders deferred required vessel inspections or

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authorized that certain vessel inspections could be conducted virtually to reduce the risk to personnel.<sup>20</sup>

**COVID-19 vaccinations.** On December 16, 2020, the Coast Guard began administering COVID-19 vaccines to its personnel according to a prioritization framework. This framework prioritized critical and mission essential personnel, including those working in health care, law enforcement, fire rescue, or search and rescue. According to Coast Guard data, between December 16, 2020, and April 30, 2021, the Coast Guard fully vaccinated 32,013 personnel (or about 58 percent of the total workforce) and partially vaccinated an additional 3,426 personnel, who were awaiting their second dose.<sup>21</sup> These personnel received the vaccine at Coast Guard medical clinics or through a mobile vaccine distribution effort. Coast Guard officials told us that they implemented a mobile vaccine distribution effort to ensure more equitable access for all Coast Guard personnel.

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## The Coast Guard Regularly Coordinated with External Entities during the Pandemic

The Coast Guard used established mechanisms to coordinate regularly with other federal agencies, state and local governments, and maritime industry stakeholders during the pandemic. These mechanisms included recurring meetings established prior to the pandemic to help coordinate regional issues among maritime stakeholders. For example, Area Maritime Security Committees, established in 2002, are intended to enhance communication between port stakeholders in federal, state and local agencies, and maritime industry organizations to address maritime security.<sup>22</sup>

Officials from all nine sectors we interviewed told us they regularly attended these and other coordination meetings during the pandemic.<sup>23</sup> In addition, officials from eight of the nine sectors we interviewed told us that, during the pandemic, this coordination increased in frequency or was

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<sup>20</sup>During a virtual inspection, Coast Guard personnel may review pictures, video, and vessel logs, among other information, in lieu of inspecting a vessel in person. We are reviewing the Coast Guard Marine Inspection Program and plan to report on this issue by early 2022.

<sup>21</sup>The Coast Guard administered the Pfizer and Moderna vaccines, which both require two doses for full vaccination, and the Johnson & Johnson vaccine, which requires one dose for full vaccination.

<sup>22</sup>Pub. L. No. 107-295, §102, 116 Stat. 2064, 2068. 46 USC 70112(a)(1)(C)(i).

<sup>23</sup>In addition, Coast Guard sector officials told us that they attended port coordination meetings and Harbor Safety Committee meetings, which address issues that may include the safety, security, mobility, and environmental protection of a local port or waterway.

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held virtually rather than in-person. For example, officials from one sector told us in October 2020 that while Area Maritime Security Committee meetings were normally held on a quarterly basis prior to the pandemic, these meetings increased to a biweekly basis during the pandemic.

The Coast Guard also coordinated directly with federal agencies to address specific COVID-19-related issues. For example, the Coast Guard established a temporary liaison position with CDC to monitor and address the challenge of safely disembarking potentially COVID-infected passengers and crew from cruise ships in U.S. waters. The Coast Guard also coordinated directly with the Federal Emergency Management Agency to provide direct assistance to state, local, tribal, and territorial governments. For example, the Coast Guard provided support by transporting personnel and cargo by helicopter and airplane in Hawaii and Alaska. Coast Guard officials also told us they have two full-time liaison officers who work at the Federal Emergency Management Agency's headquarters who have been useful in coordinating both prior to and during the COVID-19 pandemic.

In addition to participating in relevant coordination meetings, the Coast Guard also communicated with maritime industry stakeholder organizations, including by publicly issuing guidance in its Marine Safety Information Bulletins. Personnel from all five maritime industry stakeholder organizations we interviewed told us that their experiences in coordinating with the Coast Guard during the COVID-19 pandemic had been very positive.<sup>24</sup> Further, they also told us these bulletins contained important information, which they regularly used and distributed to their members. For example, a March 2020 bulletin detailed the Coast Guard's amended process for conducting remote inspections during the COVID-19 pandemic to verify vessel compliance and, if needed, for temporarily deferring required vessel inspections.<sup>25</sup>

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<sup>24</sup>We interviewed officials from the following organizations: American Association of Port Authorities, American Waterways Operators, Cruise Lines International Association, National Association of Waterfront Employers, and the Passenger Vessel Association.

<sup>25</sup>Marine Safety Information Bulletin. MSIB 09-20, *Vessel Inspections, Exams, and Documentation* (March 26, 2020).

## The Coast Guard Took Actions to Address a Variety of Challenges Posed by the COVID-19 Pandemic

The Coast Guard took actions to address a variety of challenges it faced in operating during the COVID-19 pandemic. Coast Guard officials we interviewed emphasized that taking steps to safeguard Coast Guard personnel was a primary goal in addressing these challenges throughout the pandemic. The challenges cited by officials we interviewed included: (1) initial challenges the Coast Guard faced during the first few months of the pandemic (i.e., March–May 2020), (2) challenges the Coast Guard faced in conducting its 11 statutory missions in a pandemic environment, and (3) challenges that directly affected Coast Guard personnel (see fig. 5).

**Figure 5: COVID-19 Pandemic-Related Challenges Cited by U.S. Coast Guard Officials**

Category	Challenge cited
Challenges the Coast Guard faced during the first few months of the pandemic (i.e., March–May 2020)	Information technology (IT) system functionality
	An initial lack of COVID-19 information and guidance
	Initial shortages of personal protective equipment (PPE)
	Managing passengers disembarking from cruise ships
Challenges the Coast Guard faced in conducting its 11 statutory missions in a pandemic environment	Balancing the need to safeguard personnel and continue conducting missions
	Following COVID-19 policies and procedures
	Navigating differences in COVID-19 policies and restrictions
Challenges that directly affected Coast Guard personnel	Continuing to provide training and ensure the proficiency of personnel
	Adapting to and maintaining relationships in a virtual environment
	Overseeing personnel's off-duty activities
	Addressing the lack of child care options for applicable personnel

Source: GAO analysis of Coast Guard officials' statements. | GAO-21-539

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## The Coast Guard Faced Several Challenges Early on in the COVID-19 Pandemic

Coast Guard officials we interviewed cited a number of challenges associated with conducting operations during the first few months of the COVID-19 pandemic (i.e., March–May 2020). These challenges included: (1) IT system functionality, (2) an initial lack of COVID-19 information and guidance, (3) initial shortages of PPE, and (4) managing passengers disembarking from cruise ships.

**IT system functionality.** Coast Guard officials at headquarters and across all nine sectors we interviewed stated that IT system functionality presented significant challenges, especially during the first few months of the COVID-19 pandemic when the Coast Guard expanded its telework program. These challenges included: (1) insufficient network bandwidth and remote access challenges, (2) limited number of laptop computers, and (3) difficulty conducting virtual meetings due to technology.

- *Insufficient network bandwidth and remote access challenges.* Coast Guard officials at headquarters and from eight of the nine sectors we interviewed told us that the Coast Guard’s IT system did not have the necessary network bandwidth or remote access capability to support the large number of personnel who began to telework in March 2020. For example, officials we interviewed from two sectors noted that the Coast Guard’s network was slow and often crashed or dropped users who then had to attempt to log back onto the system—a process they noted was often time-consuming. In another example, officials from one sector stated that insufficient bandwidth meant that only some personnel could access the network remotely while others were only able to access to check their email. Further, officials in the Coast Guard’s training office told us that the IT system’s unreliability made it difficult to provide remote training—a key issue given that many in-person training classes had been canceled in the pandemic’s early months. Officials responsible for managing the Coast Guard’s IT system told us they addressed this challenge by undertaking a number of efforts, to include increasing overall network bandwidth and upgrading three out of four network hub sites by the end of April 2020 to support the increased number of teleworking personnel.<sup>26</sup> Officials from six sectors noted that challenges associated with insufficient

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<sup>26</sup>In June 2020, the Coast Guard upgraded its virtual private network (VPN) from being capable of supporting less than 1,000 concurrent users, according to officials, to more than 40,000 concurrent users when using a Coast Guard-issued laptop. Further, in August 2020, the Coast Guard increased the number of concurrent users on its virtual desktop infrastructure (VDI) from 3,000 to 4,000, which allowed personnel to access the system with their personal laptops. In December 2020, the Coast Guard upgraded its fourth network hub site.

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network bandwidth and remote access during March and April 2020 improved in subsequent months.

- *Limited number of laptop computers.* Coast Guard officials at headquarters and from four of the nine sectors we interviewed told us that a shortage of available laptop computers made it difficult for some personnel to telework. Officials from one sector explained that the laptop shortage meant that some personnel had to focus on tasks that could be completed at home without IT system access, such as studying for an upcoming training class or reviewing vessel inspection documentation. Officials from another sector told us the laptop shortage required personnel to access the IT system using their personal computers, which can result in performance issues and slow network speeds. According to Coast Guard documentation, to address this challenge and help facilitate remote telework, Coast Guard headquarters staff provided more than 2,500 laptops to sectors from March through July 2020.<sup>27</sup> Headquarters officials explained that prior to the pandemic, the Coast Guard had already planned to replace desktop computers with laptops to provide personnel with more flexibility in working away from their offices, and added that the Coast Guard quickly pivoted to implement this plan when the pandemic began. These officials also told us that the pandemic had confirmed the Coast Guard's long-term vision of cultivating a more mobile workforce.
- *Difficulty conducting virtual meetings due to technology.* Coast Guard officials from five of the nine sectors we interviewed told us that conducting virtual meetings was initially difficult due to technology challenges, including a lack of available teleconference lines and problems with video conferencing technology. For example, officials from one sector explained that collaborating with other federal, state, and local officials was onerous since attendees to any given teleconference may not be capable of using the software or technological platform being employed for that meeting. Coast Guard officials also told us that when the pandemic began, the microphone and camera on Coast Guard-issued laptop computers were disabled for security reasons, which made actively participating in virtual videoconferences and teleconferences difficult. To address these

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<sup>27</sup>Coast Guard officials told us they used funding provided by the 2020 CARES Act to fund improvements to the Coast Guard's IT system, including the provision of laptop computers. Pub. L. No. 116-136, 134 Stat. 281, 542. They explained the Coast Guard plans to continue using this 2-year funding for IT system improvements, including additional laptops. For example, the Coast Guard provided an additional 5,036 laptops from July 2020 through April 2021 to training centers and other units to support its transition to a more mobile workforce.

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initial challenges, Coast Guard officials stated they deployed a new secure collaboration and communication tool in April 2020 and enabled microphones and cameras on laptop computers to improve users' ability to connect virtually. In addition, as of April 2021, the Coast Guard was working to continually improve the virtual collaboration tools available for personnel, such as by adding on-line document-sharing capabilities and increasing cybersecurity safeguards.

**An initial lack of COVID-19 information and guidance.** Coast Guard officials from six of the nine sectors we interviewed told us that a lack of information and guidance during the first weeks of the COVID-19 pandemic presented challenges. For example, sector officials told us that this lack of guidance made it difficult to know how to operate safely and required sector-level personnel to make decisions based on local conditions until Coast Guard headquarters provided more specific guidance. However, an official from one sector clarified that during the pandemic's first weeks it would have been nearly impossible for headquarters to develop and implement Coast Guard-wide policies that kept pace with the rapidly changing COVID-19 environment. Further, officials from all nine sectors we interviewed stated that following this initial phase, Coast Guard headquarters did develop and issue relevant, timely guidance for addressing the COVID-19 pandemic.

**Initial shortages of PPE.** Coast Guard officials from four of the nine sectors we interviewed told us that a shortage of PPE during the early weeks of the COVID-19 pandemic affected their ability to conduct missions or operations safely. For example, Coast Guard officials from two sectors cited challenges in ensuring its personnel had the right types of PPE—specifically N95 masks—and the quantity necessary to maintain operations.<sup>28</sup> Despite limited supplies, officials from all four sectors indicated that this equipment was provided to personnel who needed it—such as their frontline operational personnel—to mitigate the risk of exposure when conducting missions. Officials from two sectors noted that the PPE shortage was a nationwide challenge early in the pandemic and told us that Coast Guard leadership took steps quickly to address the shortage. For example, the Coast Guard developed a PPE tracker

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<sup>28</sup>In addition, officials from another sector noted that aviation personnel faced challenges in wearing both standard N95 masks and aviation helmets with integrated microphones. Specifically, Coast Guard officials told us that N95 masks hindered aircrew's ability to communicate with each other via aircraft communication systems and radios. To address this challenge, the Coast Guard identified a specific type of N95 mask that provided a lower profile for the wearers and improved crew members' ability to communicate.



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designed to actively manage its existing PPE inventory across all units and to anticipate its future needs. In addition, the Coast Guard developed a central “PPE One-Stop” website as a central source for all PPE-related information, such as guidance on appropriate PPE usage, best practices for conserving PPE, and guidelines for the re-use of N95 masks, according to a senior Coast Guard official.

**Managing passengers disembarking from cruise ships.** Coast Guard officials at headquarters and from one of the sectors we interviewed told us that managing how to disembark more than 250,000 potentially COVID-19-infected passengers from cruise ships presented a challenge early in the pandemic. In particular, headquarters officials stated that Coast Guard leadership was focused on this Coast Guard-wide challenge during the pandemic’s early months. To address this challenge, Coast Guard headquarters officials closely tracked the daily status and location of cruise ships still at sea and planned for how to disembark passengers safely (see fig. 6). Sector officials also told us they closely coordinated with local officials to safely disembark local residents from one cruise ship experiencing a COVID-19 outbreak while all non-residents were required to remain on board.

**Figure 6: U.S. Coast Guard Personnel Assisting an Individual to Disembark from a Cruise Ship Tender during the COVID-19 Pandemic**



Source: U.S. Coast Guard. | GAO-21-539

In March 2020, the Coast Guard formed the National Marine Transportation System Recovery Unit Support Cell to address the challenge posed by cruise ships bound for U.S. ports. This unit closely coordinated with other federal agencies—including CDC and the Federal Emergency Management Agency—and maritime industry stakeholder organizations through weekly teleconferences and provided daily status briefs to Coast Guard and DHS leadership. In coordination with these stakeholders, the unit assisted in disembarking more than 250,000 cruise ship passengers from 76 vessels before transitioning to support other aspects of the federal pandemic relief effort, such as assessing how COVID-19 had affected the domestic commercial fishing vessel fleet, passenger ferry operations, and maritime commercial trade.

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## The Coast Guard Took Actions to Address COVID-19 Challenges in Conducting Missions

Coast Guard officials we interviewed cited three challenges associated with conducting the Coast Guard's 11 statutory missions in a pandemic environment. These challenges included: (1) balancing the need to safeguard personnel and continue conducting missions, (2) following COVID-19 policies and procedures, and (3) navigating differences in COVID-19 policies and restrictions.

**Balancing the need to safeguard personnel and continue conducting missions.** Coast Guard officials from five of the nine sectors we interviewed told us it was difficult to address two competing priorities during the pandemic—safeguarding personnel and ensuring that statutory missions continued. For example, officials from one sector stated that achieving this balance required making difficult judgments on how best to implement safety precautions for personnel without being overly cautious. Another sector official explained that while this challenge did not have a clear solution, the Coast Guard had taken steps to address it—including by prioritizing certain statutory missions over others during the pandemic. For example, the Coast Guard prioritized its search and rescue operations to continue providing life-saving services to individuals in distress, but also developed guidance specifically tailored to mitigate rescue personnel's exposure to COVID-19 during such operations. For instance, this guidance states that all rescued survivors should wear a face covering if they cannot maintain more than 6 feet distance from Coast Guard personnel.<sup>29</sup>

The Coast Guard established a risk assessment tool in April 2020 to help operational commanders decide how and when to conduct missions and activities, and the best way to safeguard personnel responsible for carrying them out. Specifically, the tool is designed to evaluate the relative exposure risk associated with conducting different types of missions and identify appropriate mitigation measures. For example, for operations that may require physically restraining someone—such as during a law enforcement action—the tool states that Coast Guard personnel wear full PPE—including N95 masks, protective gloves, and coveralls—to reduce the risk of COVID-19 exposure.

**Following COVID-19 policies and procedures.** Coast Guard officials from seven of the nine sectors we interviewed cited challenges in following the Coast Guard's COVID-19 policies and procedures while

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<sup>29</sup>If such individuals are exhibiting COVID-19 symptoms, the Coast Guard guidance requires they wear a surgical mask to reduce Coast Guard personnel's risk of exposure.

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conducting certain statutory missions, including policies associated with social distancing, wearing PPE, and contact tracing. For example, officials from four sectors explained that certain personnel—including vessel and aircraft crew members and personnel staffing emergency operations centers—cannot realistically follow social distancing guidance because of the lack of available space in these environments. In addition, officials from one sector told us that wearing PPE—such as N95 masks, goggles, and protective gloves—can be difficult to employ for extended periods of time in certain conditions, such as high heat and humidity environments. Further, another official explained that wearing N95 masks and goggles prone to fogging could be dangerous during law enforcement operations, such as boarding a vessel during a counter-drug operation.

Coast Guard officials from four of the nine sectors we interviewed also cited challenges in following the Coast Guard’s contact tracing and quarantine procedures. This policy requires personnel having been in close contact with a confirmed COVID-19 case to quarantine for up to 14 days, which made it difficult for operational commanders to maintain mission readiness and plan for future operations, according to these officials.<sup>30</sup> For example, officials from one sector explained that planning operations without knowing exactly how many individuals may be in isolation or quarantine—and therefore unavailable to participate—was difficult. Another sector official told us that any confirmed COVID-19 cases among personnel had an effect on the larger workforce. Specifically, he explained that while two sector personnel had tested positive for COVID-19 as of November 2020, 30 individuals had to quarantine as a result of these two confirmed COVID-19 cases, which created workforce challenges and directly affected the sector’s mission readiness.

As noted earlier, Coast Guard officials we interviewed emphasized that safeguarding personnel was a primary goal throughout the COVID-19 pandemic. While implementing the Coast Guard’s COVID-19 policies may have presented challenges, headquarters officials told us such policies

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<sup>30</sup>Coast Guard documentation defines quarantine as “a Command Directed separation of a person or group of people, reasonably believed to have been exposed to a communicable disease but not yet symptomatic, from others who have not been so exposed, to prevent the possible spread of the communicable disease. The person should minimize contact with others and only go out for groceries, medicine, or other essentials.” Personnel who have been in close contact with an individual who has tested positive for COVID-19 are required to quarantine for 14 days from the date of potential exposure, according to Coast Guard policy, though the quarantine period can be decreased in certain situations, such as a negative COVID-19 test result.

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were purposefully developed and issued to mitigate the risk of COVID-19 exposure to Coast Guard personnel. As a result, the officials explained these policies and procedures were necessary to ensure the Coast Guard workforce remained healthy and capable of conducting its statutory missions.

**Navigating differences in COVID-19 policies and restrictions.** Coast Guard officials from four of the nine sectors we interviewed cited difficulties in navigating differing COVID-19 policies and restrictions among state and local governments during the pandemic that did not always align with each other or with those implemented by the Coast Guard. For example, officials from one sector told us that since its area of responsibility spans 10 states, identifying and abiding by the wide range of state and local restrictions was difficult. Further, officials from two sectors explained that 14-day quarantine periods implemented by certain states also presented personnel challenges. For example, officials from one sector explained that such 14-day quarantine periods were difficult for personnel returning from out-of-state leave and for newly transferred personnel, who in some cases, were confined in hotel rooms with their spouses, children, and pets.

A senior sector official explained that, as a federal entity, the Coast Guard is not required to follow local and state policies regarding the COVID-19 pandemic, which are often more restrictive than federal policies. However, Coast Guard officials from three sectors we interviewed told us they had made efforts to respect and follow state and local COVID-19 restrictions whenever possible. For example, officials from one sector told us they adopted the most aggressive, restrictive policies in their area to ensure sector personnel were always operating at or above the level required by local jurisdictions. In another example, officials from one sector told us they developed additional protocols above and beyond existing Coast Guard policies to manage travel to Alaskan Native and remote communities during the pandemic. They explained these efforts were necessary to build trust and ensure that Coast Guard personnel did not inadvertently transmit COVID-19 to these vulnerable communities.

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## The Coast Guard Took Actions to Address COVID-19 Challenges that Directly Affected Personnel

Coast Guard officials we interviewed cited four challenges that have directly affected Coast Guard personnel during the COVID-19 pandemic. These challenges included: (1) continuing to provide training and ensure the proficiency of personnel, (2) adapting to and maintaining relationships in a virtual environment, (3) overseeing personnel's off-duty activities, and (4) addressing the lack of child care options for applicable personnel.

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**Continuing to provide training and ensure the proficiency of personnel.** Coast Guard officials at headquarters and from six of the nine sectors we interviewed cited ensuring that personnel continued to receive necessary training and maintain proficiency during the pandemic as a significant challenge. For example, officials in the Office of Emergency Management and from two sectors told us that because of travel restrictions and training facility closures, many personnel were not able to participate in important training classes essential for mission readiness and professional development. Further, personnel who were able to attend in-person training initially had to complete a 14-day medical monitoring period at the training center prior to the course, which required several weeks spent away from their home units. One sector official noted that attending an in-person training class required some individuals to arrive 2 weeks prior to the class for the monitoring period and subsequently telework for 2 weeks following the class before physically returning to the worksite. The official noted that this represented a significant hardship for both individuals and their units, which had to plan for individuals' weeks-long absences. In November 2020, the Coast Guard updated its policy after receiving feedback from some field units to allow selected personnel to complete the 14-day monitoring period at home to provide flexibility and reduce hardship.

Coast Guard officials in five of the nine sectors we interviewed also cited concerns about the Coast Guard's ability to address a potential backlog in training following the pandemic. In addition, officials from three sectors explained that COVID-19 may have reduced proficiency among personnel who have had fewer opportunities for on-the-job training due to decreased operations during the pandemic. For example, in October 2020, officials from one sector noted that personnel had not boarded or conducted inspections of any cruise ships since March 2020.

The Coast Guard has taken steps to address challenges associated with providing training and ensuring personnel proficiency during the pandemic. First, officials in the Coast Guard's training office told us they worked with field unit personnel to identify and offer classes deemed necessary to conduct statutory missions and defer those classes that could be postponed. Second, while the Coast Guard began transitioning selected in-person training classes to a virtual format in October 2019, officials told us this effort accelerated during the COVID-19 pandemic. For example, Coast Guard officials told us that from March 2020 through April 2021, the Coast Guard delivered 320 online training classes and continues to increase online training opportunities. Third, officials responsible for training told us in November 2020 that they had assessed

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data and feedback from operational commanders to help identify which training classes should be convened to address the potential backlog. Fourth, the Coast Guard produced an after action report in September 2020 that assessed its training system's operations and identified best practices, including allowing personnel to complete prerequisite training classes virtually prior to attending in-person classes.

**Adapting to and maintaining relationships in a virtual environment.**

Coast Guard officials at headquarters and from six of the nine sectors we interviewed told us that adapting to a virtual environment during the pandemic had been difficult. For example, officials from two sectors told us that transitioning to a virtual environment disrupted the normal rhythm of work for personnel accustomed to working in-person at the workplace and in the field. Further, officials from another sector stated that virtual teleconferences were not as robust or useful as face-to-face meetings where individuals are more likely to maintain professional relationships. Coast Guard Prevention Directorate officials concurred, stating that while telework and physical separation requirements have helped to safeguard personnel, they have also made communication and information sharing more difficult. Even so, these officials told us the Coast Guard has focused energy and effort on maintaining high levels of virtual communication and connectedness among personnel to address this challenge. For example, Coast Guard officials stated they implemented weekly virtual events open to all personnel during the pandemic, including town hall meetings and "Wellness Wednesdays" events. Officials told us such events provide a useful forum for personnel to connect and discuss important topics, including key workforce challenges, correct PPE usage, mental health issues, and working while children are at home.

**Overseeing personnel's off-duty activities.** Coast Guard officials from five of the nine sectors we interviewed told us that striking a balance between allowing Coast Guard personnel to live a normal life during off-duty hours and ensuring the continued health and safety of the workforce had been challenging. For example, officials from one sector explained that leadership cannot realistically control an individual's actions while off duty or traveling on leave, where the individual could be exposed to COVID-19 and subsequently infect coworkers following their return to the workplace. To address this challenge, the Coast Guard communicated with personnel regarding the need to make safe choices. For example, a July 2020 ALCOAST message warned personnel that their personal choices while off duty affect the Coast Guard's ability to perform its missions and encouraged them to apply risk management principles to mitigate the risk of COVID-19 exposure. In addition, the Coast Guard

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implemented formal processes for approving travel leave, including requiring individuals to submit a form to their supervisor detailing information on their leave plans. Supervisors then reviewed this information and met with the individual to discuss risk factors and potential mitigation techniques before approving the leave.

**Addressing the lack of child care options for applicable personnel.**

Coast Guard officials in headquarters and from seven of the nine sectors we interviewed stated that a lack of available child care options for personnel who have children presented a significant challenge as a result of daycare and school closures during the pandemic. To address this challenge, the Crisis Action Team created the Family Concerns and Support Working Group. Officials from this working group, as well as from three sectors we interviewed, cited expanded telework and the use of alternative work schedules as critical in providing personnel with key flexibilities to help them balance child care and work.

Further, one official explained that from March through July 2020, the Coast Guard provided direct child care services for mission essential personnel through nine Coast Guard-run child development centers and provided financial support through its fee assistance program to personnel with children enrolled in community-based child care centers.<sup>31</sup> This official told us this assistance helped to ensure that mission essential personnel could continue conducting the Coast Guard's statutory missions. In July 2020, the Coast Guard began scaling up efforts to provide child care for non-mission essential personnel, according to Coast Guard officials.<sup>32</sup> While these efforts have been useful, officials told us that child care challenges continue to affect personnel—particularly those who work night and weekend shifts and therefore have limited child care options.

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<sup>31</sup>The Coast Guard Child Care Subsidy Benefit program helps to defray the cost of child care for active duty personnel and reserve personnel who have been called to active duty for at least 180 consecutive days. This benefit is to help meet the needs of eligible families where the spouse or partner is working, attending school, or both.

<sup>32</sup>As of the end of April 2021, the Coast Guard's nine child development centers were at 79 percent enrollment and providing care to 502 children, according to Coast Guard officials. In addition, these officials explained that 1,668 children were enrolled in its Subsidy Benefit program during this same period, but explained that this number would increase as more community-based child care centers re-opened. Last, Coast Guard officials also noted that some Coast Guard personnel use child care services provided by the Department of Defense.



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## The Coast Guard Lacks Controls over Telework Documentation and Its Data on the COVID-19 and Telework Statuses of its Personnel Are Not Reliable

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### The Coast Guard Lacks Controls to Ensure All Teleworking Personnel Have Valid and Current Telework Agreements

In January 2014, the Coast Guard established its telework program, which allows active duty, civilian, and reserve personnel to telework if their supervisor identifies their position as eligible.<sup>33</sup> However, the Coast Guard lacks controls to ensure that documentation required to participate in the telework program is in place. The program, in accordance with the Telework Enhancement Act, requires eligible individuals who will telework, as well as their supervisors, to complete mandatory telework training and sign a telework agreement to ensure the individuals have a valid telework agreement in place before their telework begins.<sup>34</sup> In addition, participating individuals and their supervisors are to review these telework agreements annually, or more frequently, if needed, to ensure the telework agreements are current.

**Telework training.** The Coast Guard telework program includes two mandatory telework training classes—one tailored to participating personnel and one to supervisors.<sup>35</sup> These classes provide important information regarding the telework program’s rules and regulations, according to Coast Guard officials.

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<sup>33</sup>Coast Guard, *Coast Guard Telework Program: Commandant Instruction 5330.4*, Jan. 29, 2014). According to Coast Guard policy, an individual who is able to perform work activities away from their regular worksite is eligible to telework.

<sup>34</sup>Telework Enhancement Act. Pub. L. No. 111-292, §2,124 Stat. 3165; 5 U.S.C. § 6503.

<sup>35</sup>According to the Coast Guard website, these telework training classes were developed by the Office of Personnel Management and the General Services Administration to meet the interactive training requirements of the Telework Enhancement Act.

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**Telework agreements.** Telework agreements provide a mechanism to validate that participating personnel and their supervisors understand their responsibilities and are in agreement regarding the specific work arrangements before participating in the telework program. In addition, the Coast Guard telework agreement includes a designated line where personnel and supervisors must self-certify that they have completed the mandatory telework training.

**Annual telework agreement renewals.** The Coast Guard telework program requires participating personnel and their supervisors to review telework agreements annually—or more frequently if there is a change in work schedule or other circumstances—to ensure the agreements remain current.

When we asked Coast Guard officials how they ensure that all telework program participants have met these requirements, they explained that completing these program requirements is the responsibility of participating personnel and their supervisors. They added that these personnel and their supervisors are solely responsible for retaining local copies of these agreements—either electronically or in a paper-based format—and do not submit these copies to management or further document that they have been completed.<sup>36</sup> Coast Guard headquarters officials confirmed that they do not track whether all applicable personnel and their supervisors have valid telework agreements. As a result, they were not able to tell us how many telework agreements were in place across the Coast Guard or how many teleworking personnel may not have the required telework agreements in place.

In addition, Coast Guard officials told us that although supervisors are to review telework agreements at least annually, these agreements are not required to be updated if there are no changes in status. Further, they explained these annual supervisory reviews are not documented to ensure they are taking place, which raises questions about whether information in these telework agreements remain current.

The Telework Enhancement Act of 2010 requires agencies to ensure that any federal employee participating in telework enters into a written agreement with an agency manager. In accordance with this Act, Coast

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<sup>36</sup>Coast Guard headquarters officials told us that it only retains electronic copies of telework agreements that have been denied or terminated.

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Guard policy states that prior to participating in telework, all personnel and their supervisors must enter into a valid telework agreement to verify they have completed the mandatory telework training classes and are aware of all program policies.<sup>37</sup> Coast Guard policy also requires supervisors to review telework agreements at least annually, or more frequently, as needed. In addition, the Office of Personnel Management's telework guidance states that telework agreements are living documents that should be regularly reviewed and re-signed by both the supervisor and teleworker.<sup>38</sup> Further, federal internal control standards state that documentation is a necessary part of an effective internal control system.<sup>39</sup> Therefore, as applied to telework agreements, these standards support the practice of documenting these annual reviews.

Coast Guard headquarters officials told us that civilian personnel record hours spent teleworking in WebTA, an automated time keeping system, which supervisors are then to review and verify every 2 weeks.<sup>40</sup> While recording this information in WebTA may be useful, it is not a substitute for ensuring that required telework agreements have been completed and signed in accordance with Coast Guard policy. Further, unlike civilian personnel, active duty and reserve personnel—who comprise approximately 84 percent of the total Coast Guard workforce—do not record hours spent teleworking in WebTA. Instead, Coast Guard officials told us they rely on individual supervisors to collect and retain this information—along with documentation of valid telework agreements—at the local level for all applicable active duty and reserve personnel under their command.

Developing and implementing additional internal controls to ensure that all personnel and supervisors participating in the telework program have completed telework agreements and that supervisors have reviewed and re-signed agreements at least annually would provide the Coast Guard with better assurance that its telework program policies are being met. First, ensuring that valid telework agreements are in place would help provide the Coast Guard with assurance that all participating personnel—

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<sup>37</sup>Coast Guard, *Coast Guard Telework Program: Commandant Instruction 5330.4*.

<sup>38</sup>Office of Personnel Management, *Guide to Telework in the Federal Government* (Washington, D.C.: April 2011).

<sup>39</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>40</sup>The officials added that the total number of Coast Guard civilian personnel participating in the telework program at any given time is, therefore, captured in this WebTA system.

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including active duty, reserve, and civilian personnel—and their supervisors have completed the mandatory telework training and are aware of all policies guiding the program. Second, agencies that do not document that required annual reviews of telework agreements have occurred lack an important internal control to help ensure that information in these agreements remain current. Given that Coast Guard officials anticipate that high levels of participation in its telework program may continue following the COVID-19 pandemic, ensuring that all personnel who telework have valid and current telework agreements in place will provide the Coast Guard with the information needed to make decisions that require telework data, such as for space planning or technology investments.

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### The Coast Guard Adapted Its Personnel System to Address Evolving Needs

The Coast Guard adapted its Personnel Accountability and Assessment System (personnel system) in April 2020 to help track and account for personnel during the COVID-19 pandemic. This personnel system is designed to account for, manage, and monitor Coast Guard personnel and their families who are affected by a catastrophic event or natural disaster. For example, in the event of a hurricane, the Coast Guard may issue an “Order to Account” through text message or email prompting all personnel in the affected geographic areas to report their status and the statuses of any dependents. According to Coast Guard documentation, such reporting is critical in monitoring personnel and identifying any individuals that may require assistance.

To address evolving needs posed by the COVID-19 pandemic, the Coast Guard incorporated two new modules into its personnel system to allow individuals to regularly self-report both their COVID-19 status—whether they are currently affected by COVID-19—as well as their telework status.<sup>41</sup> Table 3 provides more information on status options personnel are able to select within the COVID-19 and telework modules.

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<sup>41</sup>Coast Guard supervisory officials, called Commanding Officer Representatives, are responsible for monitoring this information for personnel under their command. These representatives also have system rights to report the COVID-19 and telework statuses for personnel under their command. Coast Guard personnel are not required to enter COVID-19 or telework statuses for their dependents.

**Table 3: Information on the U.S. Coast Guard Personnel System’s COVID-19 and Telework Status Modules**

Module	Status option	Description of status
COVID-19 status	Unaffected	Individual has not been diagnosed with COVID-19 or knowingly been exposed to someone who has been diagnosed with it
	Quarantined	Individual has either been exposed to COVID-19, is suspected of having been exposed or is displaying symptoms of COVID-19, and is separated from the general population
	Isolated	Individual has tested positive for COVID-19 or been diagnosed with COVID-19 by a health care professional, and has been separated from others who have not been exposed
	Hospitalized	Individual has been admitted to the hospital due to COVID-19
	Released	Diagnosed individual has been released from isolation or hospitalization
	Deceased	Individual has died due to diagnosed COVID-19 <sup>a</sup>
	Unreported	No status has been set (default status)
Telework status	Working on-site	Individual spends 50 percent or more of work time on-site at normal work location <sup>b</sup>
	Working off-site	Individual spends 50 percent or more of work time away from normal work location, using situational telework
	Not working	Individual is unable to work at normal work site and unable to telework
	Unknown	No status has been set (default status)

Source: GAO analysis of Coast Guard documentation. | GAO-21-539

<sup>a</sup>Individuals are not able to self-select “deceased” as a status in the COVID-19 module. However, Coast Guard supervisory officials called Commanding Officer Representatives, who are responsible for monitoring these data for personnel under their command, are able to select this status.

<sup>b</sup>This status includes individuals teleworking under their normal work schedules for less than 50 percent of work time.

According to Coast Guard policy, applicable personnel are to log into the personnel system, self-report their initial COVID-19 and telework statuses, and then subsequently update their information upon any change in their statuses. This policy states that all active duty personnel and reserve personnel on active duty orders are required to self-report and regularly update their COVID-19 and telework statuses. In contrast, civilian personnel and reserve personnel who are performing training activities while in inactive duty status are encouraged to self-report these statuses, but are not required to do so.<sup>42</sup> Further, once personnel have self-reported their statuses, supervisory officials, called Commanding

<sup>42</sup>Coast Guard reserve personnel who are performing training activities while in inactive duty status are required to participate in part-time training activities each year. These personnel may be ordered to active duty status to meet the Coast Guard’s operational needs. Coast Guard senior leadership made the decision not to require civilians to self-report their COVID-19 and telework statuses due to privacy concerns associated with personnel having to disclose protected health information and the challenges associated with negotiating with the numerous unions that represent Coast Guard civilian personnel.

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Officer Representatives, are responsible for monitoring information entered into these two modules for personnel under their command. These representatives are also required to conduct weekly audits for the purpose of validating the status information to ensure that (1) applicable personnel under their command have self-reported their statuses into these two modules, as required, and that (2) the statuses are accurate and current.<sup>43</sup>

On April 20, 2020, the Coast Guard sent an Alert and Warning System notice marked as “high importance” to all personnel requiring all applicable individuals to log into the personnel system and self-report their COVID-19 and telework statuses within 4 days.<sup>44</sup> This notice included step-by-step instructions on how to log into the personnel system and correctly update the two new modules. In addition, the Coast Guard issued two ALCOAST messages—one each in April and May 2020—reiterating that applicable personnel are required to self-report COVID-19 and telework statuses and that Commanding Officer Representatives are responsible for conducting weekly audits to verify the accuracy and completeness of the COVID-19 and telework status information for all personnel under their command. Further, the Coast Guard updated its *COVID-19 Planning Order* to include, among other things, the detailed process for determining which COVID-19 status to select based on any given scenario.

Coast Guard documentation states that the accurate and timely tracking of data on personnel’s COVID-19 and telework statuses aids strategic-level decision-making during the pandemic, such as those associated with resource allocation and the operational readiness of the Coast Guard workforce. For example, data on personnel’s COVID-19 statuses are included in weekly reports to senior leadership for the purposes of assessing both Coast Guard-wide operational readiness as well as the individual unit’s (e.g., sector) ability to continue carrying out its missions.

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<sup>43</sup>Coast Guard officials told us that Commanding Officer Representatives are located throughout the Coast Guard and unit-level representatives are to validate data for personnel under their command before this information is sent up the Coast Guard chain of command. As of April 30, 2021, there were 2,608 total Commanding Officer Representatives responsible for monitoring data on the COVID-19 and telework statuses of Coast Guard personnel, according to the Coast Guard. These included 1,082 representatives at the sector level, 283 representatives at the district level, 325 representatives at the area level, and 918 representatives at the headquarters level.

<sup>44</sup>The Alert and Warning System is a mass notification system that allows the Coast Guard to rapidly disseminate targeted alerts to all of its personnel.

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Coast Guard officials also told us they use the personnel system’s data to meet DHS reporting requirements—including the total number of confirmed COVID-19 cases among Coast Guard personnel and the percentage of the Coast Guard’s workforce who are teleworking. For example, according to personnel system data, the Coast Guard had a total of at least 2,982 confirmed COVID-19 cases and three reported deaths as of April 30, 2021. Officials responsible for tracking these data stated that this total underestimates the number of actual COVID-19 cases because of the method the Coast Guard uses to compile the data to meet DHS reporting requirements.<sup>45</sup>

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### Coast Guard Data on the COVID-19 and Telework Statuses of its Personnel Are Not Reliable

Our analysis found that data on the COVID-19 and telework statuses of Coast Guard personnel from April 2020 through April 2021 were not reliable due to missing data and concerns about accuracy. Specifically, the data consistently include thousands of active duty, reserve, and civilian personnel with “unreported” and “unknown” COVID-19 and telework statuses, respectively, which raises questions about the accuracy and completeness of these data. For example, according to these data, the number of personnel with “unreported” COVID-19 statuses ranged from a low of 1,959 individuals in August 2020 to a high of 4,455 individuals in April 2021.<sup>46</sup> Further, the number of personnel with “unknown” telework statuses ranged from a low of 2,479 individuals in August 2020 to a high of 5,108 individuals in April 2021.

When we asked Coast Guard officials about these missing COVID-19 and telework statuses, they stated that these missing data most likely represent civilian personnel, who are not required, but only encouraged to self-report their statuses. According to our analysis, however, many of the missing statuses in the personnel system were for active duty personnel, who are required by Coast Guard policy to self-report their statuses. For

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<sup>45</sup>Data on the number of confirmed COVID-19 cases among Coast Guard personnel only includes individuals who both (1) self-reported the COVID-19 module’s “isolated” status and (2) manually indicated they had received a positive COVID-19 test result by typing this information into a text box within the module, according to a Coast Guard official familiar with these data. In turn, these data do not include Coast Guard personnel who (1) did not receive a positive COVID-19 test result (but may nonetheless have been clinically diagnosed with COVID-19) or (2) did not accurately enter information into the COVID-19 module.

<sup>46</sup>According to Coast Guard officials, the personnel system captures a daily snapshot of information on personnel’s COVID-19 and telework statuses. We requested, and the Coast Guard provided, a daily snapshot of this information consecutively for every two weeks from April 2020 through April 2021. Since the Coast Guard only began collecting these data in late April 2020, the earliest data we use for the purposes of this analysis is from May 2020.

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example, according to Coast Guard data, the number of active duty personnel with “unreported” COVID-19 statuses ranged from a low of 487 individuals in August 2020 to a high of 1,295 in October 2020. Further, these same data indicate that the number of active duty personnel with “unknown” telework statuses ranged from a low of 653 individuals in August 2020 to a high of 1,602 in May 2020.

Coast Guard headquarters officials told us they did not know why the statuses for these active duty personnel would be missing given that they are required to self-report this information. Further, the officials told us they were not sure why Commanding Officer Representatives would not have taken steps to address any missing statuses when conducting weekly audits, as required by Coast Guard policy. In particular, Coast Guard policy states that Commanding Officer Representatives are to conduct weekly audits to (1) ensure that all applicable personnel have self-reported their COVID-19 and telework statuses, and (2) verify that all data reported are accurate.<sup>47</sup> In addition, federal internal control standards state that agencies should design control activities to achieve objectives and respond to risks.<sup>48</sup> These include information system controls designed to, among other things, ensure the accuracy and completeness of system data.

By requiring weekly audits of data in its personnel system, the Coast Guard has a control in place that is designed to verify the accuracy and completeness of all data reported in this system. However, the presence of missing information on the COVID-19 and telework statuses, specifically for active duty personnel who are required to self-report this information, raises concerns about whether Commanding Officer Representatives are carrying out these weekly audits as required by policy. Further, Coast Guard headquarters officials stated there is no formal process in place for documenting or confirming that these representatives have conducted weekly audits and the officials could not provide assurance or evidence that these audits were being conducted.

As stated earlier, Coast Guard policy requires active duty personnel—approximately 40,500 individuals as of April 2021—to regularly report

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<sup>47</sup>Coast Guard, *Coast Guard Personnel Accountability & Assessment System: COVID-19 Reporting Tool Combined Member & COR User Guide*, June 2020.

<sup>48</sup>[GAO-14-704G](#).



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their COVID-19 and telework statuses in the personnel system.<sup>49</sup> In contrast, Coast Guard policy does not require civilian personnel to report their COVID-19 and telework statuses.<sup>50</sup> However, the Coast Guard does encourage them to do so and the majority of civilian personnel do report this information. For example, of the 9,249 civilian personnel included in the Coast Guard personnel system as of April 30, 2021, Coast Guard data indicate that 8,242 (89 percent) had reported their COVID-19 statuses and 8,132 (88 percent) had reported their telework statuses. While collecting such data is useful in accounting for personnel and informing decisions during the pandemic, the Coast Guard must also ensure that these data are accurate. As previously described, the Coast Guard requires weekly audits as a control measure for ensuring the accuracy of the data; however, it does not have assurance that these audits are being conducted. As a result, the Coast Guard does not have assurance that reported data on the COVID-19 and telework statuses of all its personnel are accurate and complete.

Coast Guard officials stated they had not taken steps to improve the accuracy and completeness of its data on personnel's COVID-19 and telework statuses because they determined that available data was sufficient to meet the Coast Guard's needs. As described earlier, the Coast Guard regularly uses these data to meet weekly DHS reporting requirements and to aid leadership in making resource allocation decisions and in determining the operational readiness of the Coast Guard workforce at both the organization wide and individual unit levels. However, the Coast Guard does not have assurance that its required process for verifying these data—weekly audits—are actually being conducted and that these data are accurate and complete. Without such assurance, the Coast Guard and DHS may be relying on inaccurate and incomplete data when making decisions that rely on these data, such as for assessing the Coast Guard's telework posture and determining its operational readiness to conduct statutory missions.

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## Conclusions

In response to the unprecedented challenges caused by the COVID-19 pandemic, beginning in early 2020, the Coast Guard took actions to safeguard its personnel and continue conducting its statutory missions,

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<sup>49</sup>In addition, Coast Guard policy also requires reserve personnel on active duty orders to self-report this information.

<sup>50</sup>In addition, Coast Guard reserve personnel who are performing training activities while in inactive duty status are not required to self-report this information, but are encouraged to do so.

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including expanding telework to reduce the risk of COVID-19 exposure for its personnel. However, the Coast Guard lacks assurance that all teleworking personnel and their supervisors have completed two key program requirements—namely, completing and signing telework agreements prior to beginning telework and reviewing these agreements annually, or more frequently as needed. Developing and implementing additional controls to ensure all participating personnel and their supervisors have valid and current telework agreements in place would provide the Coast Guard with the information it needs regarding its telework program, which is particularly important given that Coast Guard officials anticipate telework levels may remain relatively high following the COVID-19 pandemic.

Further, the Coast Guard began collecting new data on the COVID-19 and telework statuses of its personnel, but our analysis found they were not reliable due to missing data and concerns about accuracy. Although Coast Guard policy requires that weekly audits be conducted to verify the accuracy and completeness of these data, the Coast Guard does not have assurance or evidence that these audits are being conducted. Ensuring that weekly audits are being conducted to verify the accuracy and completeness of these data is critical in providing DHS and Coast Guard leadership with assurance they are relying on quality information when making operational decisions.

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## Recommendations for Executive Actions

We are making the following three recommendations to the Coast Guard:

The Commandant of the Coast Guard should develop and implement additional internal controls to ensure that all personnel participating in the Coast Guard's telework program have valid telework agreements in place. (Recommendation 1)

The Commandant of the Coast Guard should develop and implement additional internal controls to ensure that supervisors review telework agreements at least annually and document these reviews. (Recommendation 2)

The Commandant of the Coast Guard should ensure that required weekly audits are being conducted to verify the accuracy and completeness of data on the COVID-19 and telework statuses of Coast Guard personnel. (Recommendation 3)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS and the Coast Guard for review and comment. The Coast Guard provided technical comments, which we have incorporated into the report as appropriate. In addition, DHS provided written comments, which are reprinted in appendix II and summarized below.

DHS concurred with our first and second recommendations, stating that the Coast Guard's existing telework program policy requires that all participating personnel have valid telework agreements in place, and that these agreements are to be reviewed at least annually. DHS also stated that the Coast Guard plans to issue a Coast Guard-wide notification on an annual basis to remind personnel about these telework program requirements. To address the intent of our first and second recommendations, the Coast Guard will also need to ensure that all teleworking personnel have valid telework agreements in place and that their supervisors review these agreements and document their reviews at least annually.

In addition, DHS concurred with our third recommendation, and described the Coast Guard's planned and completed actions in response to it. To address the intent of our recommendation, the Coast Guard will also need to ensure that required weekly audits are being conducted to verify the accuracy and completeness of data on the COVID-19 and telework statuses of Coast Guard personnel. We will monitor DHS's and the Coast Guard's efforts in addressing these three recommendations.

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We are sending copies of this report to the appropriate congressional committees, the Secretary of Homeland Security, the Commandant of the Coast Guard, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staffs have any questions about this report, please contact Heather MacLeod at 202-512-8777 or [macleodh@gao.gov](mailto:macleodh@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may

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be found on the last page of this report. GAO staff that made key contributions to this report are listed in appendix III.

A handwritten signature in black ink, appearing to read "H MacLeod". The signature is stylized and cursive.

Heather MacLeod  
Acting Director, Homeland Security and Justice Issues

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*List of addressees*

The Honorable Patrick Leahy  
Chairman  
The Honorable Richard Shelby  
Vice Chairman  
Committee on Appropriations  
United States Senate

The Honorable Ron Wyden  
Chairman  
The Honorable Mike Crapo  
Ranking Member  
Committee on Finance  
United States Senate

The Honorable Patty Murray  
Chair  
The Honorable Richard Burr  
Ranking Member  
Committee on Health, Education, Labor, and Pensions  
United States Senate

The Honorable Gary C. Peters  
Chairman  
The Honorable Rob Portman  
Ranking Member  
Committee on Homeland Security and Governmental Affairs  
United States Senate

The Honorable Rosa L. DeLauro  
Chairwoman  
The Honorable Kay Granger  
Ranking Member  
Committee on Appropriations  
House of Representatives

The Honorable Frank Pallone, Jr.  
Chair  
The Honorable Cathy McMorris Rodgers  
Republican Leader  
Committee on Energy and Commerce  
House of Representatives

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The Honorable Bennie G. Thompson  
Chairman  
The Honorable John Katko  
Ranking Member  
Committee on Homeland Security  
House of Representatives

The Honorable Carolyn B. Maloney  
Chairwoman  
The Honorable James Comer  
Ranking Member  
Committee on Oversight and Reform  
House of Representatives

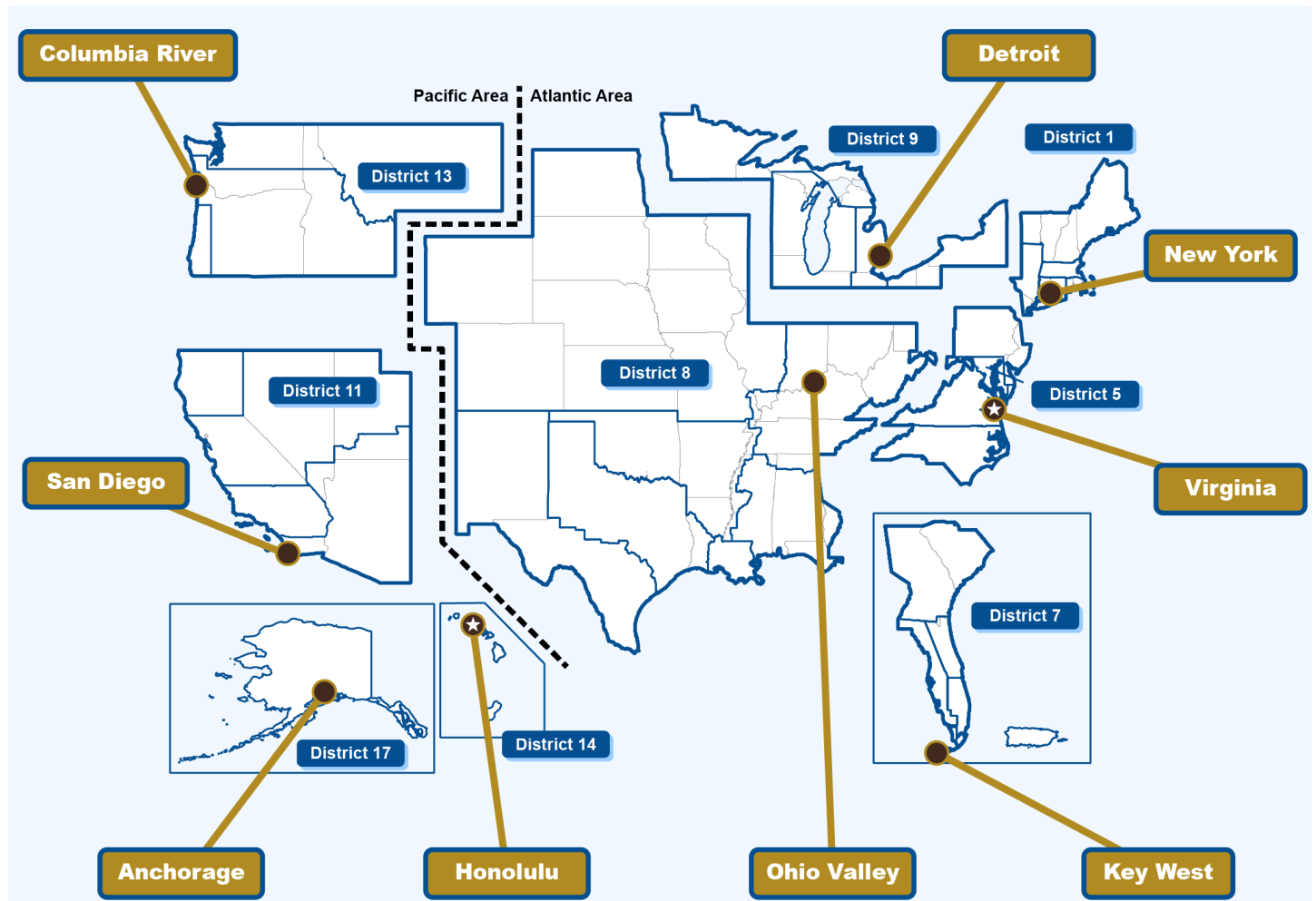
The Honorable Richard Neal  
Chair  
The Honorable Kevin Brady  
Republican Leader  
Committee on Ways and Means  
House of Representatives

The Honorable Peter A. DeFazio  
Chair  
Committee on Transportation and Infrastructure  
House of Representatives

# Appendix I: Results of Interviews with Nine Coast Guard Sector Command-Level Officials

We interviewed Coast Guard officials from nine sectors to obtain their perspectives regarding safeguarding Coast Guard personnel and continuing to conduct statutory missions during the COVID-19 pandemic. To select the sectors, we selected a non-probability sample of one sector from each of the Coast Guard's nine districts to allow for geographic diversity, among other factors. Figure 7 identifies the nine sectors we selected for interviews.

Figure 7: Map of the Nine Coast Guard Sectors Included in our Content Analysis of COVID-19 Challenges



Source: GAO analysis of U.S. Coast Guard data. | GAO-21-539

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**Appendix I: Results of Interviews with Nine  
Coast Guard Sector Command-Level Officials**

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In conducting these sector interviews, we asked Coast Guard officials to identify any challenges associated with safeguarding Coast Guard personnel and continuing to conduct statutory missions during the COVID-19 pandemic. We then conducted a content analysis by assessing the information obtained from our interviews with Coast Guard officials from nine sectors to identify common challenges cited by officials from at least two sectors.<sup>1</sup> We then organized the challenges cited into broader categories. Figure 8 describes the results of our content analysis of information and responses obtained from officials at nine Coast Guard sectors.

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<sup>1</sup>This appendix only includes challenges cited by Coast Guard officials from at least two of the nine sectors interviewed.



**Appendix I: Results of Interviews with Nine Coast Guard Sector Command-Level Officials**

**Figure 8: Results of our Content Analysis of Challenges Cited during Interviews Conducted with Officials from Nine Coast Guard Sectors**

Category	Challenge cited	Number of sectors citing the challenge
Challenges associated with COVID-19 policies and guidance	An initial lack of COVID-19 information and guidance during the pandemic's first weeks	■ ■ ■ ■ ■ ■ □ □ □
	Conducting missions according to the Coast Guard's COVID-19 guidance	■ ■ ■ ■ ■ □ □ □ □
	The need to quarantine personnel in accordance with the Coast Guard's contact tracing procedures	■ ■ ■ ■ □ □ □ □ □
	Navigating differences in the COVID-19 restrictions among other federal, state, and local entities	■ ■ ■ ■ □ □ □ □ □
	Monitoring a high volume of COVID-19 information	■ ■ ■ ■ □ □ □ □ □
Challenges in operating in a pandemic environment	Continuing to provide training and ensure the proficiency of Coast Guard personnel	■ ■ ■ ■ ■ ■ □ □ □
	Adapting to and maintaining relationships in a virtual environment	■ ■ ■ ■ ■ ■ □ □ □
	Balancing the need to safeguard personnel while continuing to conduct missions	■ ■ ■ ■ ■ □ □ □ □
	Transferring Coast Guard personnel to new duty stations	■ ■ □ □ □ □ □ □ □
Challenges with information technology (IT) system functionality	Lack of network bandwidth and difficulty accessing the Coast Guard IT system remotely	■ ■ ■ ■ ■ ■ ■ ■ □
	Difficulty communicating or holding meetings virtually due to IT system challenges	■ ■ ■ ■ ■ □ □ □ □
	Limited number of Coast Guard laptop computers available to personnel for working remotely	■ ■ ■ ■ □ □ □ □ □
Challenges with effective coordination	Coordinating with external entities due to IT system challenges	■ ■ ■ ■ ■ □ □ □ □
	Limited utility of virtual meetings	■ ■ ■ ■ ■ □ □ □ □
	Ensuring the accurate and consistent use of public health terms and definitions related to the COVID-19 pandemic	■ ■ □ □ □ □ □ □ □
Challenges in safeguarding Coast Guard personnel	Overseeing Coast Guard personnel's off-duty activities	■ ■ ■ ■ ■ □ □ □ □
	Initial shortages of personal protective equipment (PPE) during the pandemic's early weeks	■ ■ ■ ■ □ □ □ □ □
Challenges in returning personnel to the workplace	Addressing the lack of child care options for applicable personnel	■ ■ ■ ■ ■ ■ ■ □ □

Source: GAO analysis of Coast Guard sector officials' statements. | GAO-21-539

Notes: This figure presents information obtained through interviews we conducted with Coast Guard officials from nine Coast Guard sectors. This figure does not include information from other interviews we conducted with officials from Coast Guard headquarters. The information presented outlines all

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**Appendix I: Results of Interviews with Nine  
Coast Guard Sector Command-Level Officials**

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challenges cited by Coast Guard officials from more than one sector. We did not independently verify statements made by Coast Guard sector officials we interviewed. The results of these interviews are not generalizable and may not be indicative of officials' perspectives across all Coast Guard sectors. However, they provided us with informative perspectives from frontline personnel on challenges Coast Guard sector officials faced during the COVID-19 pandemic. Further, sector officials provided information on challenges they faced during the pandemic in response to our open-ended interview questions. As a result, while sector officials may not have specifically cited a selected challenge during our interviews, this does not necessarily mean their sectors did not experience this challenge during the COVID-19 pandemic. In addition, information obtained through our interviews with sector officials also helped to inform our findings (described earlier) regarding the challenges the Coast Guard faced during the COVID-19 pandemic, and the actions the Coast Guard took to address them.

# Appendix II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

July 6, 2021

Heather MacLeod  
Acting Director, Homeland Security and Justice Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO 21-539, "COVID-19: The Coast Guard Has Addressed Challenges but Could Improve Telework Documentation and Personnel Data"

Dear Ms. MacLeod:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's acknowledgment that the Coast Guard took steps to safeguard personnel and continue its missions, despite facing several challenges during the COVID-19 Pandemic. For example, GAO recognized that the Coast Guard formed the COVID-19 Crisis Action Team (CCAT) to address related issues and develop new policies and guidance. The Coast Guard remains committed to improving telework documentation and personnel data.

The draft report contained three recommendations with which the Department concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,

JIM H CRUMPACKER Digitally signed by JIM H CRUMPACKER  
Date: 2021.07.06 09:38:31 -04'00'

JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

Attachment: Management Response to Recommendations  
Contained in GAO-21-539

GAO recommended that the Commandant of the Coast Guard:

**Recommendation 1:** Develop and implement additional internal controls to ensure that all personnel participating in the Coast Guard’s telework program have valid telework agreements in place.

**Response:** Concur. The existing Commandant Instruction 5330.4, “Coast Guard Telework Program” (COMDTINST 5330.4), dated January 29, 2014, establishes the telework policy for eligible civilian employees and military members. This includes requirements to ensure all personnel participating in the Coast Guard’s telework program have valid telework agreements that are reviewed at least annually. The Coast Guard’s Assistant Commandant for Human Resources will issue an enterprise-wide notification reminding Coast Guard personnel of the requirements in COMDTINST 5330.4 that, in order to telework: (1) employees must have a valid telework agreement in place; (2) the agreement is reviewed at least annually; and (3) that supervisors must retain current copies of the telework agreements.

Although the Coast Guard remains in a COVID-19 pandemic posture, the Coast Guard will eventually enter a transitional phase to return employees to the workplace, pursuant to guidance issued by the Office of Management Budget, “Integrating Planning for a Safe Increased Return of Federal Employees and Contractors to Physical Workplaces with Post-Reentry Personnel Policies and Work Environment,” OMB M-21-25, dated June 10, 2021. Therefore, the enterprise-wide notification is projected to be issued in the second quarter of fiscal year (FY) 2022, once post-COVID return-to-work procedures are fully implemented. Subsequently, an annual notification will be issued as a reminder to the workforce regarding the requirements of COMDTINST 5330.4. Estimated Completion Date (ECD): March 31, 2022.

**Recommendation 2:** Develop and implement additional internal controls to ensure that supervisors review telework agreements at least annually and document these reviews.

**Response:** Concur. COMDTINST 5330.4 establishes the telework policy for eligible civilian employees and military members, including requirements that supervisors shall prepare, approve, and retain a copy of telework agreements, and update telework agreements at least annually or more frequently when there is a change in supervisor, work schedule, or other impacting circumstances. The Coast Guard’s planned enterprise-wide notification serving as a reminder of the requirements in COMDTINST 5330.4 will note that, in order to telework: (1) employees must have a valid telework agreement in place; (2) the agreement is reviewed at least annually; and (3) that supervisor must retain current copies of the telework agreements.

The Coast Guard will issue this notification once the Coast Guard eventually enters a

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**Appendix II: Comments from the Department  
of Homeland Security**

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transitional phase to return employees to the workplace, per OMB M-21-25, and post-COVID return-to-work procedures are fully implemented. Subsequently, an annual notification will be issued as a reminder to the workforce regarding the requirements of COMDTINST 5330.4. ECD: March 31, 2022.

**Recommendation 3:** Ensure that required weekly audits are being conducted to verify the accuracy and completeness of data on the COVID-19 and telework statuses of Coast Guard personnel.

**Response:** Concur. The COVID-19 pandemic required the Coast Guard to rapidly adjust priorities to meet personnel and operational demands. In order to track the status of personnel during these unprecedented times, for example, on May 15, 2020, the CCAT updated and implemented a new feature in the Coast Guard Personnel Accountability and Assessment System (CGPAAS) to standardize and track COVID-19 related information, and an enterprise-wide All Commandant Notice, 174-20, “ALCOAST COVID-19: REPORTING FOR COAST GUARD PERSONNEL ACCOUNTABILITY AND ASSESSMENT SYSTEM (CGPAAS) – SITREP 1,” dated May 15, 2020, directed the entire workforce to update and maintain their status in CGPAAS. Further, the CCAT remains operational at Coast Guard Headquarters, and continues to collect and verify the accuracy and completeness of data on the COVID-19 status of Coast Guard personnel via CGPAAS. Currently, the Coast Guard remains in a COVID-19 pandemic posture, but is in a transitional phase to return employees to the workplace. Once the workforce completes this transition, it will not be necessary or required to verify the accuracy and completeness of data on the COVID-19 status of Coast Guard personnel.

Additionally, COMDTINST 5330.4 establishes the telework policy for eligible civilian employees and military members, including requirements to verify the accuracy and completeness of data on the telework status of Coast Guard personnel. Specifically, per COMDTINST 5330.4, employees and their supervisors must complete telework training and sign a written agreement which includes tracking and recording the number of telework days completed in the timekeeping system. The number of days telework is performed is validated by the employee and certified by their supervisor on a biweekly basis for each pay period. Further, COMDTINST 5330.4 requires supervisors to approve and retain a copy of telework agreements and to verify, record, and maintain records of telework hours performed by military members, which applies all Coast Guard unit commanders, commanding officers, officers-in-charge, deputy/assistant commandants, and chiefs of Headquarters staff elements are required to comply with COMDTINST 5330.4. Based on the totality of established Coast Guard policies, the timekeeping system, and the CGPAAS, the intent of this recommendation is met. The Coast Guard also conducts audits to verify the accuracy and completeness of data on the COVID-19 and telework statuses of Coast Guard personnel.

DHS requests that the GAO consider this recommendation resolved and closed, as implemented.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

Heather MacLeod at 202-512-8777 or [macleodh@gao.gov](mailto:macleodh@gao.gov).

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## Staff Acknowledgments

In addition to the contact named above, Christopher Conrad (Assistant Director), Bryan Bourgault (Analyst-in-Charge), and Emily Hutz made key contributions to this report. Nathan Anderson, Ben Crossley, Dominick Dale, Dave Hooper, and Amanda Miller also contributed to this report.

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The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

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