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Washington, DC 20548

Comptroller General
of the United States

June 20, 2025

The Honorable Sean Duffy
Secretary of Transportation
U.S. Department of Transportation
1200 New Jersey Avenue, S.E.
Washington, DC 20590

Priority Open Recommendations: Department of Transportation

Dear Secretary Duffy:

Congratulations on your appointment. The purpose of this letter is to call your personal attention to four areas based on GAO's past work and 21 open priority recommendations, which are enclosed.¹ Additionally, there are 177 other GAO open recommendations that we will continue to work with your staff to address.

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

Managing Cybersecurity Risks and Information Technology (IT). The security and privacy of our nation's transportation systems are vital to public safety and national security. These critical infrastructure systems depend on IT systems and electronic data to operate and to process, maintain, and report essential information. As such, the areas of [ensuring the cybersecurity of the nation](#) and [improving IT acquisitions and management](#) have been on our [High-Risk List](#) for over 25 years and 10 years, respectively.

Accordingly, we have made numerous recommendations to DOT to enhance cybersecurity and address challenges with its systems. Specifically, DOT should fully develop a cybersecurity risk management strategy that includes how it intends to assess, respond to, and monitor risks and complete its IT workforce planning activities. In addition, DOT should address the risks of its aging air traffic control systems. Taking these actions is crucial to protect and strengthen our transportation systems.

With respect to challenges with aging air traffic control systems, we found that the Federal Aviation Administration (FAA) has been slow to modernize its most critical and at-risk systems and has not consistently provided oversight of air traffic control modernization investments. To ensure the safety and efficiency of the national airspace, we recommended that FAA report to Congress on how it is mitigating the risks of all unsustainable and critical air traffic control systems that are identified in its annual operational risk assessments. We also recommended that FAA establish a time frame for developing and implementing guidance to increase oversight

¹GAO considers a recommendation to be a priority if, when implemented, it may significantly improve government operations, for example, by realizing large dollar savings; eliminating mismanagement, fraud, and abuse; or making progress toward addressing a high-risk or duplication issue.

of pre-baselined investments that require additional resources or time prior to establishing an acquisition program baseline. Until FAA takes urgent action to reduce the time frames to replace critical and at-risk air traffic control systems, it will continue to rely on a large percentage of unsustainable systems to perform critical functions for safe air travel.

You have brought attention to the longstanding need to modernize the air traffic control system and developed a plan outlining key actions for modernization. We have reviews underway that can help to inform these efforts. This work includes: 1) an evaluation of FAA's capital planning and investment control of air traffic control modernization investments against best practices, and 2) an evaluation of FAA's Cybersecurity Strategy against key practices and the extent to which FAA has implemented its strategy to mitigate cybersecurity risks to its systems and networks. We look forward to working with DOT to ensure efforts to modernize will be made in a timely and efficient manner.

Improving Transparency and Communication. Agencies can ensure the accountability of policy and program decisions by increasing transparency and clearly communicating information to the public. To that end, DOT needs to document key decisions in discretionary grant programs, update FAA's NextGen life-cycle cost estimates, and improve cargo preference oversight. Such actions would increase transparency, more clearly communicate information to Congress and the public, and improve accountability for policy and program decisions.

Developing Plans to Address Safety Risks. Safe transportation systems are vital to the nation's well-being and economy. Effective planning can help DOT be better positioned to provide safety oversight and manage risks. Specifically, DOT should finalize a comprehensive plan for integrating drones into the National Airspace System and develop a plan to assess skill gaps in positions that oversee the safety of automated technologies. Having such plans in place would better position DOT to respond to and manage risks in these critical areas.

In addition, we have previously reported that the absence of a national aviation-preparedness plan to address communicable disease threats undermined a coordinated response to the COVID-19 pandemic. Though we recommended in 2015 that DOT develop such a plan, and a subsequent law required DOT to develop the plan, the recommendation remains unimplemented. With the recurring threat of communicable diseases quickly spreading around the globe through air travel it remains critical that the agency address this recommendation. Doing so would better position aviation stakeholders in reducing the spread of emerging communicable diseases while also minimizing unnecessary aviation disruptions in the future.

Reducing Fraud and Abuse Risks. Proactively managing risks, including from fraud and abuse, helps ensure taxpayer dollars and government services are used for their intended purposes. FAA should ensure it verifies aircraft owner information for its U.S. aircraft registry. Accurate registry information can help combat illegal activities, such as drug trafficking.

Please see Enclosure 1 for additional details about the status and actions needed to fully implement all 21 open priority recommendations out of the 198 total recommendations that remain open.

We also provide in Enclosure 2 additional information on DOT's recommendation implementation rate and implemented, closed, and new priority recommendations since our June 2024 letter to Secretary Buttigieg, and relevant management challenges from our [High-Risk List](#) that apply to DOT. In response to legislation enacted in December 2022, this enclosure also includes information on any additional congressional oversight actions that can help

agencies implement priority recommendations and address any underlying issues relating to such implementation.

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

If you have any questions or would like to discuss any of the issues outlined in this letter, please do not hesitate to contact me or Heather Krause, Managing Director, Physical Infrastructure, at KrauseH@gao.gov. Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this letter. Our teams will continue to coordinate with your staff on addressing these priority recommendations and the 177 other GAO open recommendations. I appreciate DOT's continued commitment and thank you for your personal attention to these important issues.

Sincerely,

//SIGNED//

Gene L. Dodaro
Comptroller General
of the United States

Enclosures – 2

cc: The Honorable Steven G. Bradbury, Deputy Secretary, DOT
Corey B. Sellers, Acting Assistant Secretary for Budget and Programs and Chief Financial Officer/Principal Deputy Assistant Secretary for Finance and Budget, DOT
Pavan Pidugu, Chief Information Officer, DOT
Chris Rocheleau, Acting Administrator, Federal Aviation Administration
Gloria Shepherd, Executive Director, Federal Highway Administration
Sue Lawless, Executive Director, Federal Motor Carrier Safety Administration
Jack Kammerer, Executive Director, Maritime Administration
Jack Danielson, Executive Director, National Highway Traffic Safety Administration
Ben Kochman, Acting Administrator, Pipeline and Hazardous Materials Safety Administration
Gary Middleton, Director, Audit Relations and Program Improvement, Office of the Secretary, DOT

Enclosure 1

Priority Open Recommendations to the Department of Transportation

Managing Cybersecurity Risks and Information Technology (IT)

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

Year Recommendation Made: 2017

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

Actions Needed: DOT agreed with this recommendation. In January 2020, DOT officials told us the agency had established a workgroup to lead and conduct workforce-planning activities and had defined the strategic goals and objectives for the agency's IT workforce. As of February 2024, DOT had implemented three of the eight recommended IT workforce-planning activities—developing competency and staffing requirements, assessing gaps in competencies and staffing, and developing strategies and plans to address gaps in competencies and staffing. At that time, DOT officials stated that the agency was continuing its efforts to implement the recommendation, including developing a workforce planning process. In February 2025, DOT officials stated that the agency was making an assessment of needs and resources in order to determine next steps and ensure actions are in alignment with the administration's policies and priorities and would provide a status by the end of the fiscal year.

To fully address this recommendation, DOT should complete the remaining five IT workforce planning activities. Until the agency completes these activities, it risks not adequately assessing and addressing gaps in knowledge and skills that are critical to the success of major IT acquisitions.

High-Risk Areas: [Ensuring the Cybersecurity of the Nation; Improving IT Acquisitions and Management](#)

Director: David Hinchman, Information Technology and Cybersecurity
Contact information: HinchmanD@gao.gov

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

Year Recommendation Made: 2019

Recommendation: The Secretary of Transportation should fully develop a cybersecurity risk management strategy that includes the key elements identified in this report.

Actions Needed: DOT agreed with this recommendation. As of March 2024, DOT officials stated that they had drafted a departmental cybersecurity strategy and planned to finalize it in the fourth quarter of fiscal year 2024. However, as of February 2025, DOT told us it was assessing needs and resources to determine next steps and would be able to provide a status update by the end of the fiscal year.

To fully implement this recommendation, the agency needs to develop a cybersecurity risk management strategy that includes key elements, including a discussion of the agency's risk tolerance and how it intends to assess, respond to, and monitor risks. Implementing this recommendation would help DOT address the growing number of cyber threats to systems and data by taking a risk-based approach to cybersecurity by effectively identifying, prioritizing, and managing DOT's cyber risks.

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

Director: Marisol Cruz Cain, Information Technology and Cybersecurity

Contact information: CruzCainM@gao.gov

Air Traffic Control: FAA Actions Are Urgently Needed to Modernize Aging Systems. [GAO-24-107001](#). Washington, D.C.: September 23, 2024.

Year Recommendations Made: 2024

Recommendation: The Administrator of FAA should report to Congress on how it is mitigating risks of all unsustainable and critical systems that are identified in the annual operational risk assessments.

Actions Needed: DOT agreed with this recommendation. In February 2025, FAA officials stated that they do not have an update on actions they have taken to address this recommendation and would provide an update at a later date. Without this information, Congress may not be fully informed on how FAA is mitigating risks related to critical air traffic control systems.

Recommendation: The Administrator of FAA should establish a time frame for developing and implementing guidance to increase Joint Resources Council oversight of pre-baselined investments that require additional resources or time prior to establishing a baseline.

Actions Needed: DOT partially agreed with this recommendation. Specifically, DOT provided comments that stated they agreed to establish a timeframe for developing and implementing guidance for pre-baselined programs that have experienced baselining delays due to a need for additional resources. However, DOT stated that it believed it had adequate guidance for pre-baselined programs that do not require additional resources. We agreed with DOT's comments and added contextual language to the recommendation in our final report to clarify our intention.

In February 2025, FAA officials stated that they do not have an update on actions they have taken to address this recommendation and would provide an update at a later date.

Without a time frame for developing and implementing guidance, FAA will continue to experience protracted lengths of time in establishing baselines for air traffic control modernization investments.

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

Director: Kevin Walsh, Information Technology and Cybersecurity

Contact information: WalshK@gao.gov

Director: Derrick Collins, Physical Infrastructure

Contact information: CollinsD@gao.gov

Improving Transparency and Communication

DOT Discretionary Grants: Problems with Hurricane Sandy Transit Grant Selection Process Highlight the Need for Additional Accountability. [GAO-17-20](#). Washington, D.C.: December 14, 2016.

Year Recommendation Made: 2017

Recommendation: Given DOT's new discretionary grant programs and similar challenges we have found with previous DOT programs, the Secretary of Transportation should issue a directive that governs department-wide and modal administration discretionary grant programs. Such a directive should include requirements to: (1) develop a plan for evaluating project proposals in advance of issuing a notice of funding availability that defines the stages of the process, including how the process will be overseen to ensure a consistent review of applications; (2) document key decisions, including the reason for any rating changes and the officials responsible for those changes, and how high-level concerns raised during the process were addressed; and (3) align stated program purpose and policy priorities with the evaluation and selection process.

Actions Needed: DOT agreed with this recommendation. However, we have repeatedly found that DOT's administration of discretionary grant programs does not always align with requirements set by the Office of Management and Budget (OMB) and DOT, particularly related to documentation and transparency of information. We have made multiple recommendations that DOT improve documentation and transparency for specific grant programs.

In January 2025, DOT officials stated that the Department updated its Transportation Financial Assistance Manual to reflect changes to OMB's Guidance for Federal Financial Assistance. They also noted that they intend to establish a department-wide working group to respond to the recommendation and anticipate providing more details on their approach in December 2025.

To fully implement this recommendation, DOT needs to create a comprehensive, department-wide approach for evaluating grant applications and documenting key decisions to ensure that its discretionary grant programs are consistently and transparently administered. Such a directive would help to ensure the integrity of future DOT discretionary grant award decisions.

High-Risk Area: [Funding the Nation's Surface Transportation System](#)

Director: Elizabeth Repko, Physical Infrastructure
Contact information: RepkoE@gao.gov

Traffic Safety: Implementing Leading Practices Could Improve Management of Mandated Rulemakings and Reports. [GAO-22-104635](#). Washington, D.C.: April 26, 2022.

Year Recommendation Made: 2022

Recommendation: The National Highway Traffic Safety Administration (NHTSA) Deputy Administrator should update NHTSA's rulemaking procedures to require the use of leading project schedule management practices for the activities needed to draft a proposed rule.

Actions Needed: NHTSA agreed with this recommendation. In March 2025, we confirmed that NHTSA had developed a dashboard for the activities needed to review a proposed rule. The dashboard uses some leading project schedule management practices, such as sequencing activities and establishing time frames. The dashboard, however, does not apply those leading practices for the activities needed to draft a proposed rule, such as research or testing. These practices can help manage project timeframes and reduce delays. NHTSA officials said they are developing additional procedures for NHTSA staff involved in DOT rulemaking. After we receive these procedures, we will evaluate them and provide an update, as appropriate.

To fully implement this recommendation, NHTSA needs to ensure that this dashboard, the procedures they are developing, or other documentation requires staff to use leading project schedule management practices for the activities needed to draft a proposed rule, not just review the proposed rule. Without the timely issuance of mandated rules, improvements to important safety features such as seat belts and child car seats may be delayed.

Director: Elizabeth Repko, Physical Infrastructure
Contact information: RepkoE@gao.gov

Maritime Administration: Actions Needed to Enhance Cargo Preference Oversight. [GAO-22-105160](#). Washington, D.C.: September 12, 2022.

Year Recommendation Made: 2022

Recommendation: The Administrator of the Maritime Administration (MARAD) should publicly report, on an annual basis, the cargo preference data it receives to provide information on the total cargo volumes and amounts shipped on U.S.- and foreign-flag vessels for each federal agency.

Actions Needed: DOT agreed with this recommendation. However, as of February 2025, MARAD has not publicly reported this information. A 2023 law requires MARAD to annually submit to Congress a report on the administration of cargo preference programs by other federal departments and agencies.² The same law requires that each federal department or agency that administers a cargo preference program submit certain information to MARAD by January 31 of each year. MARAD officials stated that they had prepared a report for fiscal year 2023 and received clearance from the Office of the (previous) Secretary of Transportation, but

²National Defense Authorization Act for Fiscal Year 2024, Pub. L. No. 118-31, § 3521, 137 Stat. 136, 819 (2023) (codified at 46 U.S.C. § 55301).

the report is pending review at the Office of the (current) Secretary of Transportation with no estimated date for clearance or submission to Congress.

To fully implement this recommendation, MARAD needs to submit its annual report to Congress on the administration of cargo preference programs by federal departments and agencies, as required by law. If implemented, this recommendation would demonstrate to Congress whether federal agencies are making progress toward meeting their cargo preference requirements.

Recommendation: The Administrator of MARAD should take steps to develop regulations to oversee and enforce compliance with cargo preference requirements. These steps should include evaluating options for overcoming challenges to developing such regulations, such as: (1) using a negotiated rulemaking as a means to address challenges achieving consensus on how to implement cargo preference requirements, and (2) developing and communicating a legislative proposal to address statutory challenges MARAD has identified.

Actions Needed: DOT agreed with this recommendation. However, as of February 2025, MARAD has not developed regulations to oversee and enforce compliance with cargo preference requirements. A 2022 law requires MARAD to issue a final rule to implement such requirements.³ MARAD officials told us that they have prepared a draft regulation that is currently under review within MARAD but did not know when it will be ready for review by OMB or posted for public comment. Further, MARAD officials said they have decided not to pursue a negotiated rulemaking and that they have not engaged other agencies in discussions because MARAD's draft regulation has not been completed. In addition, MARAD officials told us that they have developed a draft legislative proposal to raise cargo preference requirements from 50 percent to 100 percent for all federally financed cargo. However, MARAD has not submitted this proposal to Congress because officials said they believe that doing so could distract from draft legislation introduced in the Senate that includes the same objective as MARAD's proposal.

To fully implement this recommendation, MARAD needs to complete its rulemaking to implement and enforce cargo preference requirements. Further, MARAD should communicate, as appropriate, a legislative proposal to Congress to address any statutory challenges MARAD has identified in implementing cargo preference requirements. If implemented, this recommendation would better position MARAD to oversee and enforce cargo preference requirements.

Director: Andrew Von Ah, Physical Infrastructure

Contact information: VonAhA@gao.gov

Air Traffic Control Modernization: Program Management Improvements Could Help FAA Address NextGen Delays and Challenges. [GAO-24-105254](#). Washington, D.C.: November 9, 2023.

Year Recommendation Made: 2024

Recommendation: The Administrator of FAA should develop an updated life-cycle cost estimate for NextGen, measure FAA's performance against it, and create a schedule for updating the life-cycle cost estimate regularly.

³James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 3502, 136 Stat. 2395, 3065 (2022).

Actions Needed: FAA agreed with this recommendation. FAA stated that the COVID-19 pandemic prevented the agency from making recent updates to NextGen life-cycle costs and that it is difficult to estimate costs for some individual programs within NextGen. In October 2024, FAA provided us with a NextGen cost estimate through fiscal year 2025, about \$16 billion. However, FAA has previously stated that NextGen implementation will take until at least 2030. FAA still needs to create a NextGen life-cycle cost estimate that includes all future years up to 2030 or beyond.

To fully implement this recommendation, FAA should complete its updated life-cycle cost estimate and develop a schedule for regular updates. Taking these steps, and measuring FAA's performance against the estimate, could help FAA refine its annual NextGen budget requests and ensure that Congress has a more accurate picture of FAA's long-term NextGen funding needs to support congressional decisions on resource allocation.

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

Director: Derrick Collins, Physical Infrastructure

Contact information: CollinsD@gao.gov

Developing Plans to Address Safety Risks

Air Travel and Communicable Diseases: Comprehensive Federal Plan Needed for U.S. Aviation System's Preparedness. [GAO-16-127](#). Washington, D.C.: December 16, 2015.

Year Recommendation Made: 2016

Recommendation: To help improve the U.S. aviation sector's preparedness for future communicable disease threats from abroad, the Secretary of Transportation should work with relevant stakeholders, such as the Department of Health and Human Services, to develop a national aviation-preparedness plan for communicable disease outbreaks. Such a plan could establish a mechanism for coordination between the aviation and public health sectors and could provide clear and transparent planning assumptions for a variety of types and levels of communicable disease threats.

Actions Needed: Initially, DOT partially agreed with this recommendation. Agency officials agreed that an aviation-preparedness plan was needed but noted that the recommendation was primarily a matter of public health emergency preparedness. DOT stated that agencies that had the legal authority and expertise in this area should lead any efforts to address planning for communicable disease outbreaks, including for transportation.

In June 2020, GAO urged Congress to take legislative action to require the Secretary of Transportation to work with relevant agencies and stakeholders to develop a national aviation-preparedness plan to ensure safeguards are in place to limit the spread of communicable disease threats from abroad while at the same time minimizing any unnecessary interference with travel and trade.⁴ As of March 2022, DOT officials confirmed that they had changed their

⁴GAO, *COVID-19: Opportunities to Improve Federal Response and Recovery Efforts*, [GAO-20-625](#) (Washington, D.C.: June 25, 2020).

position and planned to take the lead, working closely with the Departments of Health and Human Services and Homeland Security, to develop an aviation-preparedness plan.

The Consolidated Appropriations Act, 2023 included a requirement for the Secretary of Transportation, in coordination with the Secretary of Health and Human Services, the Secretary of Homeland Security, and the heads of other federal departments or agencies as the Secretary of Transportation considers appropriate, to develop a national aviation-preparedness plan for communicable disease outbreaks, as we recommended, by December 29, 2024.⁵

According to agency officials, the FAA has taken steps to develop a national aviation-preparedness plan and coordinate it with interagency partners. Federal aviation officials reported that the plan will include a framework to coordinate among federal agencies, including the Centers for Disease Control and the Transportation Security Administration, as well as other appropriate federal, state, and local entities. DOT officials told us in April 2025 that the plan is pending review at OMB with no estimated date for clearance or submission to Congress.

To fully implement the recommendation, DOT should finalize and submit to Congress an aviation-preparedness plan that incorporates such elements as protocols for responding to disease threats and coordination among stakeholders. Such a plan could help maximize an effective response to a public health threat, while minimizing potential inefficiencies in the national response effort and unnecessary disruptions to the national aviation system.

Director: Derrick Collins, Physical Infrastructure

Contact information: CollinsD@gao.gov

Automated Vehicles: Comprehensive Plan Could Help DOT Address Challenges. [GAO-18-132](#). Washington, D.C.: November 30, 2017.

Year Recommendation Made: 2018

Recommendation: The Secretary of Transportation should develop and implement a comprehensive plan to better manage departmental initiatives related to automated vehicles. This plan should include leading principles such as goals, priorities, steps to achieve results, milestones, and performance measures to track progress.

Actions Needed: DOT agreed with this recommendation. However, DOT stated that it would be premature to publish a comprehensive plan at that time. Subsequently, DOT produced several plans for automated vehicles and took other actions. But these efforts did not include priorities, milestones, and other leading principles of comprehensive planning. As of February 2025, DOT officials said the department was assessing needs and resources in order to align next steps and actions with the administration's policies and priorities. Officials said a status update would be available by the end of fiscal year 2025. In the meantime, DOT remains without an overall plan for managing initiatives related to automated vehicles.

⁵The act also requires GAO to conduct a study assessing the plan including whether the plan is responsive to our prior recommendation and meets the obligations of the United States under international conventions and treaties by June 29, 2024. Further, it requires GAO to evaluate the extent to which the United States aviation system is prepared to respond to a future communicable disease outbreak. Pub. L. No. 117-328, § 105 136 Stat. 4459, 5253-55(2022). GAO plans to conduct its detailed review after DOT completes the plan.

To fully implement this recommendation, DOT needs to develop and implement a plan for managing initiatives related to automated vehicles that includes the leading principles of comprehensive planning. Until these steps are completed, it continues to be unclear whether DOT is adequately addressing automated vehicle challenges.

Director: Elizabeth Repko, Physical Infrastructure

Contact information: RepkoE@gao.gov

Natural Gas Exports: Updated Guidance and Regulations Could Improve Facility Permitting Processes. [GAO-20-619](#). Washington, D.C.: August 6, 2020.

Year Recommendation Made: 2020

Recommendation: The Administrator of the Pipeline and Hazardous Materials Safety Administration (PHMSA) should conduct a standards-specific review of regulations that incorporate standards and, if necessary, update the regulations or document its decision for not updating them.

Actions Needed: PHMSA agreed with this recommendation. As of February 2025, according to PHMSA officials and documents, the agency is continuing to conduct a standards-specific review of the eight liquefied natural gas standards incorporated into its regulations by reference. However, PHMSA has delayed its review and regulatory update. The agency originally planned to complete its update in 2022. PHMSA plans to update regulations that use those standards by issuing a proposed rule in February 2026, according to an agency document. A standards-specific review considers updates to technical standards used by federal agencies to ensure the safe design and operation of export facilities for liquefied natural gas.

To fully implement this recommendation, PHMSA should complete and document its standards-specific review and update the regulations as necessary. Without reviewing and updating regulations, PHMSA lacks reasonable assurance its regulations remain effective at ensuring safety.

Director: Frank Rusco, Natural Resources and Environment

Contact Information: RuscoF@gao.gov

Automated Technologies: DOT Should Take Steps to Ensure Its Workforce Has Skills Needed to Oversee Safety. [GAO-21-197](#). Washington, D.C.: December 18, 2020.

Year Recommendation Made: 2021

Recommendation: The Director of DOT's Department of Human Resources should assess skill gaps in key occupations that are involved in overseeing the safety of automated technologies.

Actions Needed: DOT agreed with this recommendation. In February 2025, DOT officials noted that the agency had finished developing a tool that would assess competencies and skills in key positions that oversee the safety of automated technologies, such as engineers and data scientists. DOT did not identify a time frame for completing this competency and skill assessment.

To fully implement this recommendation, DOT needs to complete its plan to assess skill gaps in positions that oversee the safety of automated technologies. Implementing this recommendation

would help DOT better understand the expertise that exists within its workforce and enable DOT to address any gaps to ensure that its workforce can effectively oversee the safety of automated technologies.

High-Risk Area: [Ensuring the Cybersecurity of the Nation](#); [Strategic Human Capital Management](#)

Director: Elizabeth Repko, Physical Infrastructure
Contact information: RepkoE@gao.gov

Drones: FAA Should Improve Its Approach to Integrating Drones into the National Airspace System. [GAO-23-105189](#). Washington, D.C.: January 26, 2023.

Year Recommendation Made: 2023

Recommendation: The Administrator of FAA should develop a drone integration strategy that includes all seven elements of a comprehensive strategy.

Actions Needed: FAA agreed with this recommendation. In April 2024, FAA provided us with documentation of its drone integration strategy, which included five of the seven elements of a comprehensive strategy but did not include the remaining two elements. Specifically, the strategy did not describe (1) activities, milestones, and performance measures, or (2) resources and investments that would be required to achieve the agency's goals. In March 2025, FAA officials told us that it is working on updating its drone integration strategy to incorporate the two remaining elements of a comprehensive strategy. FAA officials told us it is coordinating internally on this effort and plans to update the strategy by the end of 2025. We will review FAA's updated strategy when it is completed to determine whether it addresses the recommendation.

To fully implement this recommendation, FAA's drone integration strategy would need to include all seven key elements that are necessary for a strategy to be comprehensive. Without developing a strategy that incorporates all seven key elements of a comprehensive strategy, FAA risks not having the information it needs to effectively lead and manage its drone integration efforts, make well-informed decisions, and direct limited resources where they could be most beneficial.

Director: Derrick Collins, Physical Infrastructure
Contact information: CollinsD@gao.gov

Commercial Space Transportation: FAA Should Improve Its Mishap Investigation Process. [GAO-24-105561](#). Washington, D.C.: December 7, 2023.

Year Recommendation Made: 2024

Recommendation: The Administrator of FAA should direct the Office of Commercial Space Transportation to comprehensively evaluate the effectiveness of the office's mishap investigation process.

Actions Needed: FAA agreed with the recommendation. As of December 2024, FAA's Office of Commercial Space Transportation was conducting a comprehensive evaluation of its mishap

program to assess its effectiveness in achieving its intended goals and objectives. FAA expected to complete this evaluation by September 30, 2025.

To fully implement this recommendation, FAA needs to evaluate and address any gaps in its investigation process. By comprehensively evaluating the effectiveness of its mishap investigation process, FAA can better ensure safe operations in the rapidly expanding commercial space industry.

Director: Derrick Collins, Physical Infrastructure

Contact information: CollinsD@gao.gov

Drones: Actions Needed to Better Support Remote Identification in the National Airspace. [GAO-24-106158](#). Washington, D.C.: June 6, 2024.

Year Recommendation Made: 2024

Recommendation: The Administrator of FAA should identify a path forward for how to provide real-time, networked data about the location and status of drones. This could include identifying and assessing short-term and long-term options and clarifying roles and responsibilities.

Actions Needed: FAA agreed with this recommendation. In October 2024, FAA provided us with information on the research they are conducting on how to share location information with crewed aircraft pilots and law enforcement. As part of this research, FAA successfully demonstrated a potential means of sharing drone identification with these stakeholders. FAA is evaluating the results of this research to assist in determining future policy options concerning networked drone identification data. FAA plans to complete initial steps to implement this recommendation by May 31, 2025.

To fully implement this recommendation, FAA should evaluate the findings from their research and identify policies to implement them. Fully implementing this recommendation would enable FAA to fully integrate drones into the national airspace and improve safety.

Director: Derrick Collins, Physical Infrastructure

Contact information: CollinsD@gao.gov

U.S. Merchant Marine Academy: Actions Needed to Sustain Progress on Facility and Infrastructure Improvements. [GAO-24-106875](#). Washington, D.C.: August 6, 2024.

Year Recommendation Made: 2024

Recommendation: The Administrator of MARAD should take steps to ensure that the U.S. Merchant Marine Academy (the Academy) maintains continuous leadership in the Academy's Office of Facilities and Infrastructure. Such steps should include establishing a dedicated leadership and implementation team in the Office of Facilities and Infrastructure and succession planning for leadership positions in that office.

Actions Needed: MARAD agreed with this recommendation. In March 2025, MARAD reported that it was in the process of hiring a permanent Director of Facilities and Infrastructure Management, whose full-time post of duty will be on the Academy's campus in Kings Point, NY. The officials added that a tentative selection has been made and that MARAD hopes to onboard the individual in the near future. MARAD officials also stated that its Office of Human

Resources, in coordination with the Academy, will develop succession plans for leadership positions in the Office of Facilities and Infrastructure Management by September 30, 2025.

To fully implement this recommendation, MARAD needs to ensure that the Office of Facilities and Infrastructure has full-time, dedicated leadership and a succession plan to maintain continuous leadership in that office. Without continuous leadership and a dedicated implementation team in the Office of Facilities and Infrastructure Management, the Academy does not have assurance that it will be able to implement planned capital projects and address campuswide maintenance activities.

Recommendation: The Administrator of MARAD should ensure that the Academy conducts strategic workforce planning to determine the needed resources, capabilities, and any skill gaps in the Office of Facilities and Infrastructure.

Actions Needed: MARAD agreed with this recommendation. In March 2025, MARAD reported that MARAD's Office of Human Resources awarded a contract in July 2024 to help MARAD design and implement a comprehensive Strategic Human Capital Plan, which will include a cohesive strategic human capital plan for the Academy. MARAD plans to complete the development of the Strategic Human Capital Plan by September 30, 2025.

To fully implement this recommendation, MARAD needs to complete a strategic workforce plan for the Academy that addresses needed resources, capabilities, and skill gaps for the Office of Facilities and Infrastructure Management. Without strategic workforce planning, MARAD and the Academy will not have the necessary information to acquire the right staff with the right skills, including determining which tasks are best performed by contractors or Academy employees.

Recommendation: The Administrator of MARAD should ensure that the Academy develops and implements cost estimating policies and procedures for facility and infrastructure projects that align with best practices for cost estimating.

Actions Needed: MARAD agreed with this recommendation. In March 2025, MARAD reported that the Academy is engaging with the FAA and the United States Army Corps of Engineers to develop interagency agreements, and that one goal of those agreements is to enhance ongoing cost-estimation efforts for Academy facilities and infrastructure projects. When we confirm what actions the agency has taken in response to this recommendation, we will provide updated information. According to MARAD, the Academy's Office of Facilities and Infrastructure Management plans to develop and communicate a methodology for cost estimation by September 30, 2025.

To fully implement this recommendation, MARAD needs to ensure that the Academy has established cost estimating policies and procedures that align with best practices and taken steps to implement these policies and procedures for Academy capital projects. Without developing and implementing these policies and procedures, MARAD and the Academy do not have reasonable assurances that they are reliably estimating project costs.

Director: Andrew Von Ah, Physical Infrastructure

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Reducing Fraud and Abuse Risks

Aviation: FAA Needs to Better Prevent, Detect, and Respond to Fraud and Abuse Risks in Aircraft Registration. [GAO-20-164](#). Washington, D.C.: March 25, 2020.

Year Recommendations Made: 2020

Recommendation: The Administrator of FAA should verify aircraft registration applicants' and dealers' eligibility and information.

Actions Needed: FAA agreed with the recommendation. In May 2024, the FAA Reauthorization Act of 2024 required implementation of this recommendation. In February 2025, FAA officials stated that their efforts to implement this recommendation were ongoing. Specifically, in November 2024, FAA submitted a rulemaking proposal to the Aviation Safety Office of Rulemaking that requires collecting additional personally identifiable information needed to determine eligibility.

To fully implement this recommendation, FAA needs to collect needed data and develop an approach for verifying applicant and dealer information and eligibility. Without a process to verify applicants' and dealers' eligibility and information, FAA is limited in its ability to prevent fraud and abuse of its aircraft registry.

Recommendation: The Administrator of FAA should increase aircraft registration and dealer fees to ensure the fees are sufficient to cover the costs of FAA efforts to collect and verify applicant information while keeping pace with inflation.

Actions Needed: FAA agreed with the recommendation. In February 2025, FAA officials told us they created a modern fee structure that would recover all costs and keep pace with inflation. FAA plans to publish an Advance Notice of Proposed Rulemaking covering aircraft registration, airman certification, and airman medical certificate fees, according to the August 2024 Unified Agenda of Federal Regulatory and Deregulatory Actions.

To fully implement this recommendation, FAA needs to implement the new fee structure and ensure it covers the costs of FAA's application verification efforts and can be adjusted further to keep pace with inflation. Without a change to these fees, FAA's registration costs will continue to be borne by the taxpayers and to limit resources available for applicants' and dealers' verification.

Director: Rebecca Shea, Forensic Audits and Investigative Service

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Enclosure 2

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

Department of Transportation's Recommendation Implementation Rate

In November 2024, we reported that, on a government-wide basis, 70 percent of our recommendations made 4 years ago were implemented.⁶ DOT's recommendation implementation rate was 68 percent. As of March 2025, DOT had 198 open recommendations.

Implemented, Priority Status Removed, and New Priority Recommendations

Our June 2024 letter to Secretary Buttigieg and others identified 20 priority recommendations.⁷ Since then, DOT implemented 4 priority recommendations, we removed priority status from 1 recommendation, and we added 6 new priority recommendations.

Implemented recommendations:

- In February 2025, GAO confirmed that the National Highway Traffic Safety Administration (NHTSA) has documented the overall process for making changes to its New Car Assessment Program (NCAP), published its final decisions to include pedestrian safety tests in crashworthiness and crash avoidance testing in NCAP, and communicated these changes publicly, addressing our priority recommendations for this program.⁸ In addition, NHTSA's website now includes a 10-year roadmap for potential NCAP updates. The pedestrian safety testing is effective for model year 2026 vehicles in development by automakers. As a result of these actions, automakers and the public have enhanced clarity on NHTSA's process for updating NCAP, how NHTSA will test the pedestrian safety features that are commonly available on new vehicle models, and its plans for improving vehicle safety to inform investment and purchasing decisions.
- In October 2024, DOT took actions to strengthen its ability to protect personally identifiable information by issuing a standard operating procedure outlining the chief privacy officer's role in addressing the agency's hiring, training, and professional development needs with respect to privacy. DOT also provided evidence of training sessions and professional development activities undertaken by the privacy program. By taking these steps and addressing our priority recommendation, DOT is better positioned to identify staffing needs and ensure a well-qualified privacy workforce.⁹
- In February 2025, GAO confirmed that NHTSA issued a comprehensive plan to address limitations in the information crash test dummies provide related to the greater risks faced

⁶GAO, [Performance and Accountability Report: Fiscal Year 2024](#) (Washington, D.C.: Nov. 15, 2024).

⁷GAO, *Priority Open Recommendations: Department of Transportation*, [GAO-24-107347](#) (Washington, D.C.: June 10, 2024).

⁸GAO, *Pedestrian Safety: NHTSA Needs to Decide Whether to Include Pedestrian Safety Tests in Its New Car Assessment Program*, [GAO-20-419](#) (Washington, D.C.: April 23, 2020).

⁹GAO, *Privacy: Dedicated Leadership Can Improve Programs and Address Challenges*, [GAO-22-105065](#) (Washington, D.C.: September 22, 2022).

by some demographic groups, such as older people, in vehicle crashes. The plan includes information on the use of crash outcome data, computer simulations, and a process for developing dummies. NHTSA presented the plan and activities at a NHTSA public meeting and added the plan and information to its public website. Agency officials said they anticipate providing progress updates at future public meetings. By addressing our priority recommendation in this area, NHTSA is now better positioned to address gaps in its efforts, improve safety for all vehicle occupants, and enhance communication to improve the transparency of its efforts.¹⁰

Recommendation with priority status removed: We removed the priority status from one recommendation to DOT regarding DOT oversight of the air ambulance industry. Since our report, provisions in the No Surprises Act, part of the Consolidated Appropriations Act, 2021, enhanced protections for individuals against balance billing for air ambulance service and allowed DOT to use data collected by the Department of Health and Human Services (HHS) to help determine whether an air ambulance provider is engaged in unfair and deceptive practices and unfair methods of competition. As of March 2025, HHS has not finalized the rulemaking to collect these data. We believe the No Surprises Act provisions have lessened the priority level of this recommendation. However, we continue to believe it should be implemented.

To fully address the recommendation, DOT should, as required by the FAA Authorization Act of 2018, submit its report to Congress on air ambulance oversight including a description of the information sources DOT will use to conduct oversight of air ambulance providers. In February 2025, DOT officials told us they were internally circulating this report for review.¹¹

New priority recommendations: The 6 new priority recommendations fall into the areas of managing cybersecurity risks and information technology and developing plans to address safety risks. (See Enclosure 1.)

High-Risk List

In February 2025, we issued our biennial update to our [High-Risk List](#).¹² This list identifies government operations with greater vulnerabilities to fraud, waste, abuse, and mismanagement. It also identifies the need for transformation to address economy, efficiency, or effectiveness challenges. One of our high-risk areas—[funding the nation's surface transportation system](#)—requires congressional action to develop a sustainable plan while also centering on DOT and the agency's ability to maximize existing resources.¹³

Several other government-wide, high-risk areas also have direct implications for DOT and its operations. These include [improving management of IT acquisitions and operations](#), [improving strategic human capital management](#) and [personnel security](#)

¹⁰GAO, *Vehicle Safety: DOT Should Take Additional Actions to Improve the Information Obtained from Crash Test Dummies*, [GAO-23-105595](#) (Washington, D.C.: March 8, 2023).

¹¹GAO, *Air Ambulance: Data Collection and Transparency Needed to Enhance DOT Oversight*, [GAO-17-637](#) (Washington, D.C.: July 27, 2017).

¹²GAO, *High-Risk Series: Heightened Attention Could Save Billions More and Improve Government Efficiency and Effectiveness*, [GAO-25-107743](#) (Washington, D.C.: Feb. 25, 2025).

¹³[GAO-25-107743](#).

clearance process, managing federal real property, and ensuring the cybersecurity of the nation.

In addition to DOT's high-risk area, we urge your continued attention to the other government-wide, high-risk issues as they relate to DOT. Progress on high-risk issues has been possible through the concerted actions and efforts of Congress, OMB, and the leadership and staff in agencies, including within DOT. In March 2022, we issued a report on key practices to successfully address high-risk areas, which can be a helpful resource as your agency continues to make progress to address high-risk issues.¹⁴

Congress's Role on GAO Recommendations

We also recognize the key role Congress plays in providing oversight and maintaining focus on our recommendations to ensure they are implemented and produce their desired results. Legislation enacted in December 2022 includes a provision for GAO to identify any additional congressional oversight actions that can help agencies implement priority recommendations and address any underlying issues relating to such implementation.¹⁵

Congress can use various strategies to address our recommendations, such as incorporating them into legislation. Congress can also use its budget, appropriations, and oversight processes to incentivize executive branch agencies to act on our recommendations and monitor their progress. For example, Congress can hold hearings focused on DOT's progress in implementing GAO's priority recommendations, withhold funds when appropriate, or take other actions to provide incentives for agencies to act. Moreover, Congress can follow up during the appropriations process and request periodic updates.

Congress also plays a key role in addressing any underlying issues related to the implementation of these recommendations. For example, Congress can pass legislation providing an agency explicit authority to implement a recommendation or requiring an agency to take certain actions to implement a recommendation.

¹⁴GAO, *High-Risk Series: Key Practices to Successfully Address High-Risk Areas and Remove Them from the List*, [GAO-22-105184](#) (Washington, D.C.: Mar. 3, 2022).

¹⁵James M. Inhofe National Defense Authorization Act for Fiscal Year 2023, Pub. L. No. 117-263, § 7211(a)(2), 136 Stat. 2395, 3668 (2022); H.R. Rep. No. 117-389 (2022) (accompanying Legislative Branch Appropriations Act, H.R. 8237, 117th Cong. (2022)).

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