

**DHS' Implementation of
OIG Recommendations
Related to Drug
Interdiction**





OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

November 17, 2021

MEMORANDUM FOR: The Honorable John K. Tien
Deputy Secretary
Department of Homeland Security

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

**JOSEPH V
CUFFARI** Digitally signed by
JOSEPH V CUFFARI
Date: 2021.11.12
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SUBJECT: *DHS' Implementation of OIG Recommendations
Related to Drug Interdiction*

Attached for your information is our final report, *DHS' Implementation of OIG Recommendations Related to Drug Interdiction*. The report identifies actions the Department of Homeland Security has taken to enhance its drug interdiction programs' overall effectiveness. We periodically conduct verification reviews to evaluate progress on selected audit recommendations, including whether corrective actions achieved the intended result. This report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Bruce Miller, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment

cc: Admiral Karl L. Schultz, Commandant, United States Coast Guard
Troy Miller, Acting Commissioner, U.S. Customs and Border Protection
Tae Johnson, Acting Director, U.S. Immigration and Customs
Enforcement



DHS OIG HIGHLIGHTS

DHS' Implementation of OIG Recommendations Related to Drug Interdiction

November 17, 2021

Why We Did This Review

We recommended nine actions between March 2011 and July 2019 that DHS could take to improve efficiency and effectiveness of its drug interdiction efforts. We reviewed DHS' activities for eight closed recommendations to verify the adequacy, effectiveness, and timeliness of DHS' corrective actions.

What We Recommend

This report contains no recommendations.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

The Department of Homeland Security improved drug interdiction efforts with timely corrective actions in response to eight of our prior recommendations. Specifically, DHS improved maritime drug interdiction operations by enforcing and strengthening existing mechanisms to coordinate operations and improve oversight at the field and Department levels.

Additionally, DHS improved personnel safety by implementing practices to protect personnel in case of exposure to harmful and toxic drugs. For example, DHS:

- revised its policies to include guidance for handling and storing fentanyl;
- equipped its permanent vaults and drug transport vehicles with naloxone for treatment in case of accidental fentanyl exposure, and trained personnel on its use; and
- implemented controls to reduce the risk of using faulty evidence bags.

Further, DHS improved administration of drug interdiction activities through enhanced internal controls. Specifically, DHS augmented staffing to better manage drug seizure caseloads in the field, and improved drug storage and destruction processes. Finally, DHS improved visibility of drug control activity outcomes by reporting drug seizure data and air and maritime patrol hours to appropriate stakeholders as required by Federal law.

DHS Response

A copy of DHS' management comments in their entirety is included as Appendix A.



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Background

The Department of Homeland Security is responsible for protecting our borders from the illegal movement of drugs. Each year, DHS invests billions of dollars to help fulfill this responsibility.

According to *The Biden-Harris Administration's Statement of Drug Policy Priorities for Year One*, since 2015, overdose death numbers have risen 35 percent, reaching a historic high of 70,630 deaths in 2019. This rate of increase is greater than for any other type of injury-related death in the United States, and illicit fentanyl and other synthetic opioids are the primary drivers. According to the Administration's policy, part of the solution to the opioid overdose epidemic involves preventing illicit drugs from entering the United States.

Illicit drug trafficking provides most of the funding for Transnational Criminal Organizations.¹ Even though illicit drug trafficking into the United States can occur by mail, air, and other means, it typically occurs across land and maritime borders.

DHS leads the Nation's drug interdiction efforts through a cross-component approach involving the United States Coast Guard (Coast Guard), U.S. Customs and Border Protection (CBP), and U.S. Immigration and Customs Enforcement (ICE). Within CBP, the Office of Field Operations (OFO) operates at the ports of entry into the United States while the U.S. Border Patrol (Border Patrol) operates between ports of entry. CBP's Air and Marine Operations (AMO) and Coast Guard operate off our coasts within U.S. maritime borders. ICE investigates criminal activity associated with illicit drug trafficking.

Since 2016, quantities of seized marijuana coming into the United States decreased by 68 percent. However, the quantities of more dangerous seized drugs, such as methamphetamines and fentanyl, increased more than 2 and 5 times, respectively. Table 1 shows quantities for three types of drugs CBP seized from 2016 through 2020.

¹ Michael Sinclair, *Order From Chaos: The wicked problem of drug trafficking in the Western Hemisphere*, The Brookings Institution (Jan. 15, 2021), <https://www.brookings.edu/blog/order-from-chaos/2021/01/15/the-wicked-problem-of-drug-trafficking-in-the-western-hemisphere/>.



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Table 1. Seized Drugs by Type and Weight from 2016 – 2020*

Drug Type	2016	2017	2018	2019	2020	Change
Marijuana	1,643,715	1,068,413	668,495	586,031	522,494	-68%
Methamphetamine	53,279	66,484	91,262	62,106	187,771	252%
Fentanyl	1,055	2,448	1,920	3,104	7,300	592%

* Weights are in pounds

Source: DHS Office of Inspector General analysis of CBP-reported seizure statistics

Introduction

We reviewed eight drug interdiction related recommendations from four DHS OIG audit reports, issued between fiscal years 2011 and 2019, to determine whether DHS’ corrective actions adequately addressed the recommendations. The four reports we reviewed were:

- *Management Alert - CBP Did Not Adequately Protect Employees from Possible Fentanyl Exposure*, OIG-19-53;
- *DHS Drug Interdiction Efforts Need Improvement*, OIG-17-09;
- *AMO and Coast Guard Maritime Missions Are Not Duplicative, But Could Improve with Better Coordination*, OIG-17-03; and
- *CBP’s Efficacy of Controls Over Drug Seizures*, OIG-11-57.

We included only closed recommendations in our scope. Appendix B lists the reports we reviewed and their recommendations.²

Results of Verification Review

DHS’ corrective actions addressed prior OIG report recommendations. Specifically, DHS improved operations, personnel safety, and administration of its drug interdiction activities.

DHS Improved Drug Interdiction Operations

DHS improved drug interdiction operations by enforcing its cross-component maritime operations plan; it implemented mechanisms to coordinate operations and improve oversight.

² For the only open recommendation from the four reports reviewed, we recommended DHS develop and implement a plan to ensure components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts. We look forward to assessing DHS’ corrective actions for recommendation closure.



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DHS Improved Operations through Enforcing and Strengthening Existing Coordination Mechanisms

In June 2011, DHS established the Maritime Operations Coordination Plan (MOC-P) to coordinate cross-component maritime operations, planning, information sharing, intelligence integration, and response activities for a synchronized departmental response to drug interdiction. However, in a FY 2017 report, we determined that although AMO and Coast Guard coordinated operations at the regional level, communication and coordination at the local level did not always occur.³ For example, AMO and Coast Guard did not always coordinate operations, activities, and training in local areas.

In response to our report, CBP, Coast Guard, and ICE enforced the MOC-P and strengthened Regional Coordinating Mechanisms (ReCoMs).⁴ ReCoMs coordinate Federal, state, and local activities to avoid duplicative operations. They also offer a layered presence of defense and identify and resolve possible gaps in authorities, jurisdiction, responsibilities, and capabilities for their regions. Stakeholders accomplish this through joint training exercises, after-action briefings, and sharing lessons learned. ReCoMs also allow Federal, state, and local stakeholders to assess security risks at specific seaports and develop risk mitigation strategies with the support of the Area Maritime Security Committee.

Further, DHS implemented additional operating mechanisms to improve information sharing, intelligence integration, and response activities required by the MOC-P. For example, the South Florida Region created a Joint Intelligence and Operations Coordination Center (JIOCC) to maximize resources, support ReCoM intelligence targeting, and consolidate operational priorities.⁵ The JIOCC also identifies resource assignment overlaps and addresses asset coverage gaps and border vulnerabilities across adjacent ReCoMs through a joint operational coordination process.

DHS Coordinates Operations through Department-Level Oversight

In our FY 2017 report, we determined DHS did not have a department-level oversight mechanism to ensure AMO and Coast Guard coordinated operations. We recommended DHS reestablish a department-level oversight mechanism to ensure CBP and Coast Guard coordinated operations. As a result, DHS established the Maritime Security Coordination Working Group (MSCWG) to

³ *AMO and Coast Guard Maritime Missions Are Not Duplicative, But Could Improve with Better Coordination*, OIG-17-03, October 14, 2016,

<https://www.oig.dhs.gov/sites/default/files/assets/2017/OIG-17-03-Oct16.pdf>.

⁴ DHS has 32 ReCoMs positioned around the United States and its territories.

⁵ The South Florida JIOCC consists of members from the Coast Guard, AMO, OFO, CBP Office of Intelligence, Border Patrol, and ICE Homeland Security Investigations.



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ensure the DHS components coordinated maritime planning, operations, and oversight activities.

However, DHS dissolved the MSCWG in 2019 because two existing groups, the Senior Leaders Council and the Deputy's Management Action Group, provided the same departmental oversight. The Council advises and recommends corrective actions to the DHS Secretary on issues of overall departmental policy, strategy, and operations. The Deputy Management Action Group discusses and recommends actions to the DHS Deputy Secretary on topics such as operational planning and joint operations.

According to DHS officials, planning and coordination among AMO, Coast Guard, ICE, and local law enforcement continue to evolve as stakeholders identify new trends and changes in drug trafficking strategies. DHS is currently modernizing the MOC-P to align with changes in communication, information sharing, and coordination.

DHS Improved Personnel Safety

DHS' corrective actions improved personnel safety measures in case of accidental exposure to toxic and hazardous drugs. Specifically, CBP improved personnel access to and training for naloxone in case of accidental drug exposure. CBP also improved its practices for detecting and replacing faulty evidence bags used to store seized drugs.

CBP Improved Measures to Protect Personnel from Accidental Drug Exposure

DHS is responsible for protecting its personnel from workplace hazards, as they seize, transport, store, and dispose of harmful drugs. In our 2019 report, we determined CBP did not implement controls to protect its personnel in case of exposure to harmful and toxic drugs such as fentanyl.⁶ Specifically, CBP did not always make naloxone, a medication to treat opioid overdose, available to personnel in storage vaults and transport vehicles in case of accidental exposure. Additionally, CBP neither developed guidance for handling and storing fentanyl, nor trained personnel on methods for combating accidental fentanyl exposure.

In response, CBP revised its policy and required field offices to equip its vaults and vehicles with naloxone nasal spray kits and train personnel on its proper

⁶ *Management Alert - CBP Did Not Adequately Protect Employees from Possible Fentanyl Exposure*, OIG-19-53, July 16, 2019, <https://www.oig.dhs.gov/sites/default/files/assets/2019-07/OIG-19-53-Jul19.pdf>.



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use.⁷ CBP also included the hazards of fentanyl and methods to combat accidental exposure in its basic training for new personnel.

CBP Improved Practices for Detecting and Replacing Defective Drug Storage Bags

In our 2011 report, we found that CBP used bags with defective seals to store drugs.⁸ Properly sealed evidence bags ensure that no one tampers with seized drugs and that the integrity of evidence is maintained. At that time, CBP's policy stated that, during physical inventory, if personnel noticed a seizure bag not properly sealed or the bag showed evidence of tampering or damage, personnel must repackage the seizure into a new, properly sealed bag. However, other than during inventory, CBP did not have a process to detect faulty bags.

In response to our report, CBP directed its field offices to inspect evidence bags for defects and replace any damaged bags. During its inspection, CBP determined a sample of defective bags had adhesive strips that were near or beyond the standard adhesive's shelf life of 5 to 7 years. To avoid storing evidence bags beyond their recommended useful life, CBP required destruction of unused bags older than 4 years and directed field offices not to order more than a 6-month supply of evidence bags.

CBP also required contractors to enhance the adhesive strips on evidence bags to make bags easier to close. CBP mandated each bag be marked with a "born-on" date⁹ as a way to determine its remaining useful shelf life. CBP issued policy not to use a bag 4 years after its born-on date and implemented procedures for annual field inspections to determine whether field personnel adhered to CBP requirements. These corrective actions improved personnel safety by reducing the risk of exposure to harmful drugs.

DHS Improved Drug Interdiction Administration

DHS improved drug interdiction activities through enhanced controls. Specifically, DHS augmented staffing to manage drug seizure caseloads. DHS also improved compliance with drug storage and destruction policies by better managing its waiver¹⁰ process. Further, DHS improved visibility on drug control activity outcomes by reporting drug seizure data and resources DHS

⁷ CBP's *Seized Asset Management and Enforcement Procedures Handbook* (SAMEPH) 6.13.

⁸ *CBP's Efficacy of Controls Over Drug Seizures*, OIG-11-57, March 17, 2011, https://www.oig.dhs.gov/assets/Mgmt/OIG_11-57_Mar11.pdf.

⁹ A "born-on" date is the date the manufacturer produced the bag.

¹⁰ SAMEPH 2.2 directs CBP and ICE personnel to follow all procedures detailed in the handbook, unless they obtain written approval to waive the procedure.



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dedicated to air and maritime patrols to appropriate stakeholders, as required by Federal law.

DHS Augmented Staffing to Manage Drug Seizure Caseloads

In our 2011 report, we recommended CBP assess appropriate staffing levels in vaults and field offices to effectively perform duties and responsibilities.¹¹ In 2013 and 2020, CBP studied staffing allocations and determined it needed additional staff to better distribute drug seizure caseloads. As a result, CBP requested funding to hire additional seized property staff. Although some field offices hired additional staff, CBP officials said it has not reached its assessed staffing levels and cannot hire more staff without additional funding. CBP continues to request additional funds for more staff. In the interim, CBP supplements shortages by temporarily re-assigning staff as needed, such as while conducting annual seized drug inventory and fulfilling critical vault assignments.

DHS Improved Compliance with Drug Storage and Destruction Policies

In our 2011 report, we also assessed the efficacy of CBP's controls for recording, transporting, storing, and disposing of drug seizures. We determined that CBP field personnel did not always comply with policies and procedures because of insufficient oversight throughout key stages of the drug seizure case management process. For example, CBP personnel used improper or expired drug storage and destruction waivers to bypass policy requirements. CBP could not properly manage the waivers or provide adequate oversight over the waiver process because it did not have a system to track them. Further, CBP did not have control mechanisms to ensure personnel properly transported seized drugs, completed forms as required, and destroyed drugs within required timeframes. As a result, we recommended CBP implement a waiver tracking and management system, as well as strengthen communication and oversight to ensure field personnel complied with established policies and procedures.

To address these issues, CBP developed a waiver tracking and management system in its Seized Assets and Case Tracking System (SEACATS)¹² and made the waivers available electronically on its internal website. SEACATS now allows personnel to submit, track, deny, or approve waivers electronically in one central system. According to CBP officials, the waiver tracking system

¹¹ *CBP's Efficacy of Controls Over Drug Seizures*, OIG-11-57, March 17, 2011, https://www.oig.dhs.gov/assets/Mgmt/OIG_11-57_Mar11.pdf.

¹² SEACATS is CBP's electronic repository for seized property inventory and case processing information related to arrests and seized property, including seized drugs.



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improved oversight and efficiency by reducing the time and paperwork involved in the approval process.

Additionally, CBP developed reports in SEACATS to monitor and manage various stages of the seized drug handling process to ensure compliance with policies and procedures. For example, CBP now requires personnel to generate monthly reports to identify weight discrepancies of stored drug seizures. Doing so allows CBP to more closely monitor and mitigate theft and loss of stored drugs. Additionally, CBP created modules in SEACATS to better manage drug storage and destruction timeframes.

Further, CBP uses SEACATS as a central repository for documents such as custody receipts and destruction orders, allowing personnel easier access to critical documentation. CBP is also enhancing SEACATS' capabilities to allow digital signatures. According to staff, these enhancements will make it easier to process custody receipts timely.

DHS' Improved Visibility of Drug Control Activity Outcomes

Federal law mandates DHS annually report its seizure data, including “the number and type of seizures of drugs by each component of the Department of Homeland Security seizing drugs,” to the Office of National Drug Control Policy (ONDCP)¹³ and appropriate congressional committees.¹⁴ The reporting requirement helps ensure DHS meets national drug control outcomes and accurately assesses the impact of billions of dollars spent annually on illicit drug control activities. In our 2016 report, we determined that DHS did not have a mechanism to report drug seizure data, including interdiction resource hours to ONDCP and Congress.¹⁵ We recommended DHS report to the appropriate stakeholders drug seizure data by component, type, and geographic area, as well as air and maritime patrol hours dedicated to drug interdiction missions.

As a result, in 2018, DHS began submitting annual reports to ONDCP and appropriate congressional committees. The reports contain the number of component drug seizure events, types, and weights of seized drugs, geographical region of drug seizures, and air and maritime patrol hours dedicated to drug interdiction missions.

¹³ ONDCP leads and coordinates the Nation's drug policy to improve the health and lives of the American people. ONDCP accomplishes this through developing and overseeing implementation of the National Drug Control Strategy.

¹⁴ 21 U.S.C. § 1704(a)(3)(B).

¹⁵ *DHS Drug Interdiction Efforts Need Improvement*, OIG-17-09, November 8, 2016, <https://www.oig.dhs.gov/sites/default/files/assets/2017/OIG-17-09-Nov16.pdf>.



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Conclusion

DHS' corrective actions improved drug interdiction operations; personnel safety; administration of staffing resources, drug storage and destruction policies; and visibility of drug control activity outcomes through enhanced internal controls. The increase in illicitly manufactured opioids such as fentanyl has become the primary driver of drug overdose in the United States, resulting in a national crisis. Continued drug interdiction activities at our borders and on the high seas is paramount to our Nation's efforts to reduce the availability of illicit narcotics in the United States and curtail the negative effects of criminal drug organizations.

We previously recommended that DHS develop and implement a plan to ensure components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts. As noted in Appendix B of this report, that recommendation remains open, and we look forward to assessing DHS' corrective actions for closure.

Management Comments and OIG Analysis

We evaluated DHS' formal written response, including technical comments, and made changes, as appropriate. DHS stated that we did not address its actions taken or ongoing and planned efforts for one open recommendation; specifically, the Department's development of outcome-based performance measures that assess the success of drug interdiction efforts. Although we acknowledge DHS' efforts to address this open recommendation, we could not assess whether the corrective actions taken were sufficient to render recommendation closure. A copy of DHS' management comments in their entirety is included as Appendix A.

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

Our objective was to determine the adequacy, effectiveness, and timeliness of DHS' corrective actions to four OIG reports (OIG-19-53, OIG-17-09, OIG-17-03, OIG-11-57) that made eight recommendations for improvement to DHS' drug interdiction efforts. To answer our objective, we reviewed OIG-issued reports related to DHS drug interdiction from FYs 2011 through 2019 and identified recommended actions to improve DHS' drug interdiction efforts. We included audits with closed recommendations in our scope to determine whether DHS implemented its proposed corrective actions. We excluded one report that was



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under a follow-up engagement and excluded one recommendation from another report that was resolved but still open.

We also reviewed and analyzed Federal laws, regulations, policies, and procedures applicable to the audits in our scope as well as documentation DHS submitted to satisfy recommendations.

To assess whether AMO, Coast Guard, and ICE enforce the MOC-P, share information and intelligence, and coordinate drug interdiction activities, we interviewed AMO and ICE officials. We reviewed and analyzed the:

- MOC-P for DHS component signatures and requirements;
- ReCoM Northeast and Eastern Central Florida Implementation Plan;
- South Florida JIOCC partner requirements;
- JIOCC workshop attendees; and
- quarterly ReCoM training emails.

We also interviewed DHS headquarters, CBP headquarters, OFO, and AMO officials to gain an understanding of corrective actions, request supporting documentation, and assess whether field personnel understood policies and procedures related to our review.

To assess whether DHS improved safety, we obtained and reviewed relevant guidance and interviewed CBP headquarters and OFO officials. In addition, we randomly selected six field offices and verified:

- naloxone availability and expiration dates;
- personnel certifications that they were trained on the use of naloxone;
- drug seizure evidence bags had born-on dates; and
- personnel were aware of procedures to avoid using faulty bags, and corrective actions to replace faulty bags.

To assess staffing levels in CBP field offices, we:

- interviewed CBP headquarters and OFO officials; and
- reviewed and analyzed staffing assessments for FYs 2013 and 2020, and budget requests for FYs 2016 through 2021.

To assess whether DHS improved visibility on drug control activity outcomes, we reviewed:

- DHS drug seizure reports submitted to ONDCP for FYs 2017 and 2019;
- component-reported drug seizure statistics for FYs 2017 through 2019; and



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- OFO and Border Patrol drug seizure data, and AMO operations statistics on CBP's public website.

We observed personnel's electronic access to updated and current policies, procedures, and communications. In addition, we corroborated testimony via digital observations of field office workspaces and sharing of field personnel desktops.

We conducted this verification review between November 2020 and March 2021 pursuant to the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.

The Office of Audits major contributors to this report are Sean Pettersen, Director; Melissa Powe Williams, Audit Manager; Patricia Epperly, Auditor-in-Charge; Lori Smith, Auditor; J. Farias, Program Analyst; Thomas Hamlin, Communications Analyst; Clarence Brown, Independent Referencer.



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Appendix A
DHS Comments to the Draft Report

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



**Homeland
Security**

October 13, 2021

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Jim H. Crumacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

JIM H

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Date: 2021.10.13 12:31:36
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SUBJECT: Management Response to Draft Report: “DHS’
Implementation of OIG Recommendations Related to Drug
Interdiction” (Project No. 21-003-AUD-DHS)

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

The Department is pleased to note OIG’s positive recognition that DHS took timely corrective actions to address all eight of the closed drug interdiction-related recommendations OIG reviewed from four prior reports issued between fiscal years 2011 and 2019. More specifically, OIG found that DHS’ actions improved drug interdiction operations, personnel safety, administration of staffing resources, drug storage and destruction policies, and visibility of drug control activity outcomes through enhanced internal controls.

However, OIG chose not to review actions taken, on-going, or planned to fully address the one open recommendation—from the four reports reviewed—involving developing and implementing a plan to ensure Components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts.¹ Senior DHS leadership believes it is important that Congress and the public also have insights into what Departmental program officials and subject matter experts have done and are doing to implement this recommendation, including the challenges faced attempting to develop outcome-based performance measures.

¹ Recommendation 2 in OIG-17-09, “DHS Drug Interdiction Efforts Need Improvement,” dated November 8, 2016.



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As background, most of the Department’s interdiction operations cover a wide range of illicit activities, including human smuggling, intellectual property violations, illegal cash transfers, counterfeit currencies and products, as well as illicit drugs. Therefore, the most important measure—effectiveness of the interdiction operation in question—doesn’t easily answer the question of outcomes in any particular activity. In addition, most operational measures are necessarily process- or output-oriented, since they need to measure observed phenomena. However, DHS believes that measuring the contribution of Departmental activities to the desired outcomes with respect to availability and use of illicit drugs is responsive to OIG’s open recommendation; therefore, the Department began coordinating with the Office of National Drug Control Policy (ONDCP), who initiated development of the “Supply Reduction Strategic Outcomes Framework” in 2016.

In the spring of 2017, the DHS Office of the Chief Financial Officer, Program Analysis and Evaluation Division (PA&E) joined a working group established by ONDCP for the purpose of developing an approach to measure the outcomes associated with the Federal government’s counterdrug efforts. The framework was intended to incorporate measures from all departments and agencies involved in drug interdiction efforts, in order to establish a true picture of the impact of their efforts on reducing the availability of illicit drugs in the United States. Unfortunately, the framework was ultimately discontinued due to leadership turnover in ONDCP and a decision to focus instead on developing a new, comprehensive drug control strategy, which was published in February 2020.

Although DHS no longer has the framework as a vehicle to develop more outcome-focused measures, we continue to improve our existing measures through the measure revision process and by focusing on outcomes where possible when both revising existing and developing new measures. For example, the Department currently has several measures that, either directly or indirectly, measure an activity’s contribution to interdiction outcomes:

- U.S. Immigration and Customs Enforcement’s (ICE) Disruption/Dismantlement of Transnational Criminal Organizations;
- U.S. Customs and Border Protection’s (CBP) Rate of Interdiction Effectiveness;
- CBP’s Percent of Detected Aircraft Incursions; and
- U.S. Coast Guard’s (USCG) Cocaine Removal Rate.

Not only do these measures (with the possible exception of the USCG’s Cocaine Removal Rate, which more precisely is an estimate rather than a measure) indirectly quantify the activity’s contribution to drug interdiction, but they also serve as proxies for any discussion of effectiveness.

In addition, as the Department implements the Foundations for Evidence-Based Policymaking Act, dated January 14, 2019, PA&E will lead efforts to build capacity to conduct evaluations of specific programs. These evaluations will drive new measures



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that better characterize program outcomes, and many of these measures will further support the Department's ability to determine effectiveness of DHS drug interdiction activities.

The Department also participates in an Interagency GAO [U.S. Government Accountability Office] High-Risk List Consortium, formed 2020, to share best practices and otherwise facilitate department and agency efforts to address various issue areas involving programs and operations that are 'high risk' due to their vulnerabilities to fraud, waste, abuse, and mismanagement, or that need transformation. In 2021, the Consortium formed a Subcommittee focused on GAO's high-risk issue titled: "National Efforts to Prevent, Respond to, and Recover from Drug Misuse," led by ONDCP and for which DHS participation is led by the Office of Strategy, Policy, and Plans (with CBP and USCG supporting²), to begin thinking through what needs to happen for there to be a coordinated government-wide response to the opioid crisis in particular and rising drug abuse in general. Specific Subcommittee initiatives are still being developed; however, DHS anticipates at some point the Subcommittee will revisit prior ONDCP efforts to develop an approach to measure the outcomes associated with the Federal government's counterdrug efforts.

DHS remains committed to strengthening its drug interdiction-related efforts in support of the Nation's National Drug Control Strategy, which is focused on achieving one overarching strategic outcome:

"Building a stronger, healthier, drug-free society today and in the years to come by drastically reducing the number of Americans losing their lives to drug addiction in today's crisis, and preparing now to dominate the drug environment of the future."

The draft report did not contain any recommendations; however, DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG'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 again in the future.

² ICE is not participating as part of Subcommittee at this time because the ICE Homeland Security Investigations Contraband Smuggling Unit is already participating on ONDCP drug interdiction working groups related to the drug misuse issue. ICE and other DHS Components will participate on the Subcommittee in the future once the work of the committee is more fully identified, as appropriate.



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Appendix B
DHS OIG Audit Report Recommendations Related to DHS Drug Interdiction Efforts (FYs 2011 through 2019)

#	Report	Recommendation Status
1	<p><i>Management Alert - CBP Did Not Adequately Protect Employees from Possible Fentanyl Exposure, OIG-19-53</i></p> <p>Recommendation 1: We recommended CBP revise its procedures handbook to include guidance for handling and storing opioids such as fentanyl. At a minimum, CBP should:</p> <ul style="list-style-type: none"> • require naloxone be available to all employees, at facilities, and in vehicles involved in seizure, transportation, and storage of fentanyl; and • train employees on administering naloxone. 	Closed
2	<p><i>DHS Drug Interdiction Efforts Need Improvement, OIG-17-09</i></p> <p>Recommendation 1: We recommended DHS develop and implement a plan to ensure compliance with 21 U.S.C. § 1704 and annually submit to ONDCP and the appropriate congressional committees the number:</p> <ul style="list-style-type: none"> • and type of drug seizures by each DHS component and statistical information on the geographic areas of the seizures; and • of air and maritime patrol hours primarily dedicated to drug supply reduction missions undertaken by each component of DHS. 	Closed
3	<p><i>DHS Drug Interdiction Efforts Need Improvement, OIG-17-09</i></p> <p>Recommendation 2: We recommended DHS develop and implement a plan to ensure components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts.</p>	Open
4	<p><i>AMO and Coast Guard Maritime Missions Are Not Duplicative, But Could Improve with Better Coordination, OIG-17-03</i></p> <p>Recommendation 1: We recommended DHS reestablish an oversight mechanism at the Department level to ensure that AMO and the Coast Guard coordinate operations.</p>	Closed



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5	<p><i>AMO and Coast Guard Maritime Missions Are Not Duplicative, But Could Improve with Better Coordination, OIG-17-03</i></p> <p>Recommendation 2: We recommended the Coast Guard Commandant, CBP Commissioner, and U.S. Immigration and Customs Enforcement Director revise the Maritime Operations Coordination Plan to include requirements for coordination and information sharing at all levels, especially the local level.</p>	Closed
6	<p><i>CBP's Efficacy of Controls Over Drug Seizures, OIG-11-57</i></p> <p>Recommendation 1: We recommended CBP strengthen communication and oversight to ensure that field personnel comply with established policies and procedures regarding receipting, recording, transporting, storing, and disposing of seized drugs.</p>	Closed
7	<p><i>CBP's Efficacy of Controls Over Drug Seizures, OIG-11-57</i></p> <p>Recommendation 2: We recommended CBP conduct a staffing allocation assessment to staff key positions to ensure that staffing is properly aligned with seizure caseloads, and that all field locations are properly staffed with the appropriate SPS and legal case personnel to carry out their duties and responsibilities.</p>	Closed
8	<p><i>CBP's Efficacy of Controls Over Drug Seizures, OIG-11-57</i></p> <p>Recommendation 3: We recommended CBP develop a plan to replace defective evidence bags in the field. This plan should include:</p> <ul style="list-style-type: none"> • identifying ports with defective evidence bags; • securing a contractor that can provide non-defective evidence bags; and • replacing defective evidence bags as soon as possible. 	Closed
9	<p><i>CBP's Efficacy of Controls Over Drug Seizures, OIG-11-57</i></p> <p>Recommendation 4: We recommended CBP implement a waiver tracking and management system.</p>	Closed

Source: OIG reports published between FYs 2011 and 2019



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