

**The DHS Unified
Coordination Group for
Operation Allies Welcome
Coordinated Afghan
Resettlement but Faced
Challenges in Funding and
Authority**





OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

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September 29, 2022

MEMORANDUM FOR: Randolph D. Alles
Under Secretary (Acting)
Management Directorate

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

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

**JOSEPH V
CUFFARI**

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SUBJECT: *The DHS Unified Coordination Group for Operation
Allies Welcome Coordinated Afghan Resettlement but
Faced Challenges in Funding and Authority*

Attached for your action is our final report, *The DHS Unified Coordination Group for Operation Allies Welcome Coordinated Afghan Resettlement but Faced Challenges in Funding and Authority*. We incorporated the formal comments from DHS in the final report.

The report contains two recommendations aimed at improving the program's overall effectiveness. Your office concurred with both recommendations. Based on information provided in your response to the draft report, we consider both recommendations resolved and open. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed upon corrective actions. Please send your response or closure request to OIGInspectionsFollowup@oig.dhs.gov.

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 Thomas Kait, Deputy Inspector General for Inspections and Evaluations, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

The DHS Unified Coordination Group for Operation Allies Welcome Coordinated Afghan Resettlement but Faced Challenges in Funding and Authority

September 29, 2022

Why We Did This Evaluation

DHS led OAW by establishing a UCG to coordinate the U.S. resettlement of vulnerable Afghans. We evaluated DHS' administration of the UCG, the UCG's coordination of Federal agencies' OAW activities, and the UCG's general oversight of the Afghan resettlement process.

What We Recommend

We recommended DHS propose that Congress create a contingency fund for the establishment of future UCGs and develop guidance on lines of authority for DHS-led UCGs.

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

On August 29, 2021, the President designated the Department of Homeland Security (DHS) as the lead Federal agency for Operation Allies Welcome (OAW), a Federal effort to resettle in the United States vulnerable Afghans who were evacuated from Afghanistan after the fall of the Afghan government in the summer of 2021. The President further directed DHS to establish a Unified Coordination Group (UCG) to coordinate the Federal resettlement effort.

For OAW, the UCG needed to quickly coordinate resettlement for tens of thousands of evacuated Afghans who began arriving in the United States prior to the UCG's formation. In accordance with the President's directive, the UCG coordinated the resettlement of approximately 74,190 vulnerable Afghans during the first operational phase of OAW. We found that the UCG faced two significant challenges leading OAW: (1) the absence of direct funding for most DHS OAW activities during the beginning of the operation and (2) the absence of clear and direct authority for UCG leadership. These challenges affected the UCG's coordination of the resettlement process. In particular, the UCG had trouble recruiting staff to support OAW and encountered problems procuring needed supplies and equipment. With respect to leading this effort, UCG officials and Federal partners were hindered by unclear lines of authority.

DHS Response

DHS concurred with both recommendations. We consider them resolved and open.



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Abbreviations

COVID-19	coronavirus disease 2019
DoD	Department of Defense
DOS	Department of State
FEMA	Federal Emergency Management Agency
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
ICS	Incident Command System
MOA	memorandum of agreement
NGO	nongovernmental organization
NIMS	National Incident Management System
NRF	National Response Framework
NSC	National Security Council



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NSM-2	National Security Memorandum-2
OAR	Operation Allies Refuge
OAW	Operation Allies Welcome
POE	port of entry
SRO	Senior Response Official
UCG	Unified Coordination Group
VA	Veterans Administration



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Background

The collapse of the Afghan central government and security forces in the summer of 2021 led to a massive U.S. military operation, Operation Allies Refuge (OAR),¹ to evacuate vulnerable Afghans² from Afghanistan. On August 29, 2021, the President directed the Department of Homeland Security to lead and coordinate the Federal Government's effort to resettle evacuated Afghans in the United States via an operation named Operation Allies Welcome (OAW). The President further directed the DHS Secretary to establish a Unified Coordination Group (UCG)³ and designate a Senior Response Official (SRO) to lead and coordinate the UCG.

The UCG was established to ensure Federal resources, authorities, and expertise were used in a unified and synchronized manner to support OAW goals. These goals included overseeing resettlement of tens of thousands of Afghan evacuees who arrived in the United States within weeks of the fall of the Afghan government in the summer of 2021. The UCG was comprised of senior-level representatives from several Federal departments and agencies, including the Department of Defense (DoD), Department of State (DOS), Department of Health and Human Services (HHS), Department of Housing and Urban Development (HUD), and the Veterans Administration (VA).

The UCG segmented OAW into two operational phases, with Phase 1 lasting from August 2021 through February 2022 and Phase 2 lasting from March 2022 through September 2022. OAW Phase 1 focused on resettling Afghan guests⁴ who arrived in the United States during the first months of the operation and were temporarily housed at one of eight "safe havens" at

¹ On July 14, 2021, the White House announced OAR, an initiative to support relocation flights for interested and eligible Afghan nationals and their families who had supported the United States and partners in Afghanistan and were in the special immigrant visa application pipeline.

² Vulnerable Afghans were those who were eligible for special immigrant visas because they took significant risks to support U.S. military and civilian personnel in Afghanistan, were employed by or on behalf of the U.S. Government in Afghanistan or coalition forces, or were a family member of an eligible special immigrant visa applicant. Additionally, the United States evacuated journalists, human rights activists, humanitarian workers, and other Afghans whose careers put them at risk, as well as family members of American citizens and lawful permanent residents.

³ According to the DHS *National Response Framework*, Fourth Ed., Oct. 28, 2019, a UCG is made up of senior leaders representing state, tribal, territorial, insular area, and Federal interests, and in some instances includes local jurisdictions, the private sector, and nongovernmental organizations. A UCG is responsible for determining staffing levels and coordinating staff based on incident requirements. Further, a UCG should include operations, planning, public information, and logistics to integrate personnel for unity of government effort.

⁴ The UCG used the term "Afghan guests" to refer to OAW Afghan evacuees.



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designated military bases across the country.⁵ OAW Phase 2 is focused on resettling Afghan guests who arrived in the United States starting in March 2022. These Afghan guests are temporarily housed at one nonmilitary safe haven in Lansdowne, VA.

By the end of Phase 1 of OAW, 84,563 Afghan evacuees⁶ with varied legal statuses arrived at ports of entry (POE)⁷ in the United States. See Table 1 for a breakdown of the immigration status of U.S. arrivals during Phase 1.

Table 1. Immigration Status of U.S. Arrivals from Afghanistan

Immigration Status	Immigration Status Definition	Number of U.S. Arrivals	Percentage of U.S. Arrivals
Afghan parolees	Evacuees with Afghan citizenship who did not have a valid U.S. visa or permanent resident status and were paroled into the United States*	72,627	86%
U.S. citizens	Evacuees who were born or naturalized in the United States	4,568	5%
Lawful permanent residents	Evacuees who had been granted the right to reside permanently in the United States	3,611	4%
Afghans with U.S. visas	Evacuees with determinations from a U.S. embassy or consulate indicating that they were eligible to seek entry to the United States for the purpose stated in their visa	3,459	4%

⁵ A safe haven is a facility set up in the United States to house and provide support to Afghan guests. For OAW Phase 1, safe havens were designated at eight U.S. military bases: Camp Atterbury, IN; Fort Bliss, TX; Fort Lee, VA; Fort McCoy, WI; Fort Pickett, VA; Holloman Air Force Base, NM; Joint Base McGuire-Dix-Lakehurst, NJ; and Marine Corps Base Quantico, VA.

⁶ An evacuee is any person, regardless of immigration status, whose evacuation from Afghanistan to the United States or a location overseas controlled by the United States has been facilitated by the United States. This includes special immigrant visa applicants who left Afghanistan beginning July 29, 2021, and people evacuated during OAR.

⁷ A POE is any place where someone can legally enter the country. For OAW, most Afghan evacuees arrived at Dulles International Airport in Virginia or Philadelphia International Airport in Pennsylvania.



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Immigration Status	Immigration Status Definition	Number of U.S. Arrivals	Percentage of U.S. Arrivals
Other third country nationals or unknown	Evacuees who were not citizens of the United States or Afghanistan or whose status could not be determined	298	<1%
Total		84,563	100%

Sources: February 20, 2022, UCG Daily Report; U.S. Constitution; and DOS guidance on U.S. visas

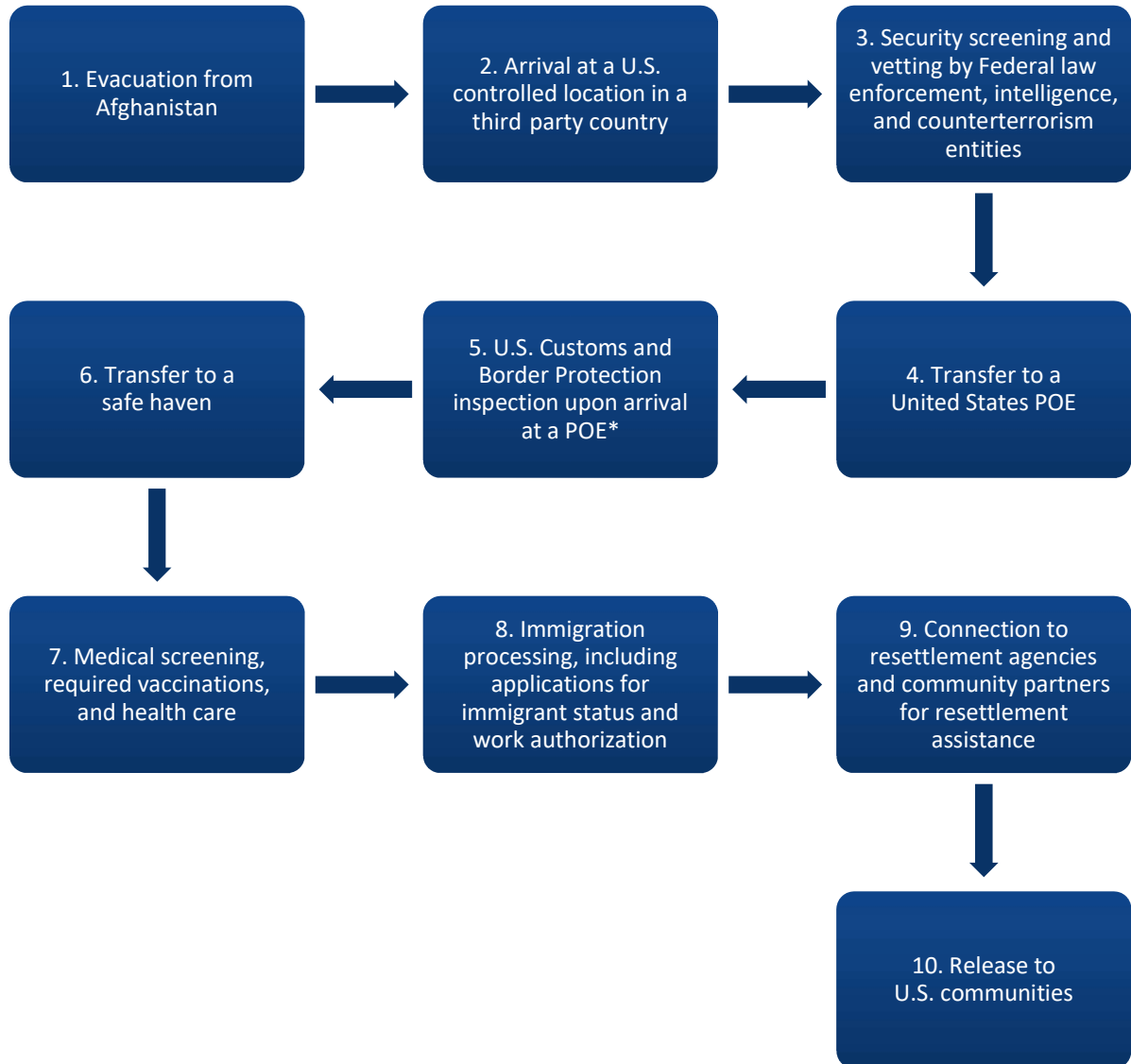
* Parole allows an individual who may be inadmissible or otherwise ineligible for admission into the United States to stay in the United States temporarily for urgent humanitarian reasons or significant public benefit. Most Afghan nationals arriving as part of OAW were paroled into the United States for humanitarian reasons for a period of 2 years.

The OAW resettlement process generally includes initial immigration processing, coronavirus disease 2019 (COVID-19) testing and quarantine, temporary accommodation at safe havens, and resettlement support before relocation to communities across the country. See Figure 1 for an overview of the resettlement process for OAW Phase 1.



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Figure 1. Overview of the Phase 1 Resettlement Process



Source: DHS OIG analysis of UCG documents

* After this point in the resettlement process, Afghan guests were able to voluntarily depart from a POE or safe haven without completing all steps of the resettlement process or receiving additional resettlement support. DHS OIG is evaluating the UCG's tracking of Afghan evacuees independently departing from POEs and safe havens.



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Results of Evaluation

The resettlement of Afghans in the United States was an undertaking on an operational scale not seen in the United States since the resettlement of approximately 130,000 Vietnamese refugees after the fall of Saigon in 1975. For OAW, the UCG needed to quickly coordinate resettlement for tens of thousands of evacuated Afghans who began arriving in the United States prior to the UCG's formation. In accordance with the President's directive, the UCG coordinated the resettlement of approximately 74,190 vulnerable Afghans during the first operational phase of OAW.⁸

We found that the UCG faced two significant challenges in leading OAW: (1) the absence of direct funding for most DHS OAW activities during the beginning of the operation and (2) the absence of clear and direct authority for UCG leadership. These challenges affected the UCG's coordination of the resettlement process. In particular, the UCG had trouble recruiting staff to support OAW and encountered problems procuring needed supplies and equipment. With respect to leading this effort, UCG officials and Federal partners were hindered by unclear lines of authority.

Under DHS' Leadership, the UCG Coordinated the Resettlement of Afghan Guests

In an August 29, 2021 memorandum titled *Designation of the Department of Homeland Security as Lead Federal Department for Facilitating the Entry of Vulnerable Afghans into the United States* (Presidential Memorandum), the President directed the DHS Secretary to lead the coordination of ongoing efforts across the Federal Government to resettle vulnerable Afghans. The President further directed the Secretary to establish a UCG and identify an SRO to lead it, under the Secretary's authority. The Secretary complied with the President's directive and in an August 30, 2021 memorandum titled *Designation of Robert J. Fenton as the Senior Response Official in Support of Efforts to Resettle Afghan Nationals* (SRO Designation Memorandum) designated the Federal Emergency Management Agency (FEMA) Region 9 Administrator to immediately establish the UCG and serve as the SRO.⁹

The Presidential Memorandum outlined five requirements. We found that the UCG met all five requirements.

⁸ Of the 84,563 Afghan evacuees who arrived in the United States by the end of OAW Phase 1, approximately 74,190 were processed through a safe haven. The remaining evacuees voluntarily departed from a POE.

⁹ The SRO's tenure lasted from August 30, 2021, to April 1, 2022, and covered all of OAW Phase 1.



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Requirement 1: Employ the National Response Framework to enhance unity of effort

The UCG used the National Response Framework (NRF) as the foundation for its structure. The NRF provides emergency management principles for effective response to different types of national incidents. It recommends an integrated organizational structure based on FEMA's National Incident Management System (NIMS)¹⁰ principles and its Incident Command System (ICS)¹¹ structure. The SRO structured the UCG using the principles of the NRF, NIMS, and ICS by forming a centralized and unified command center within the UCG and creating operational components that included finance/administration, operations, logistics, and planning. In addition, the SRO assigned Senior Executive Service employees as Federal Coordinators to safe havens to lead and coordinate Federal efforts at the regional and local levels based on NIMS guidance on Incident Management Teams.¹² See Appendix C for an organization chart showing the UCG's primary structure during Phase 1 of the operation.

Requirement 2: Develop strategic objectives and priorities

The UCG established strategic objectives for OAW and periodically revised them as the needs of the operation changed. The UCG regularly developed management plans that included incident objectives and described the basic strategy, command priorities, and safety considerations for use during each operational period, which ranged from 3 days to 1 week depending on the needs of the operation.

As an example, in the management plan for the operational period September 1, 2021, through September 4, 2021, there were six defined UCG command objectives, including to screen and vet all arriving evacuees and

¹⁰ FEMA's *National Incident Management System*, Third Ed., October 2017, defines a comprehensive approach for all levels of government, nongovernmental organizations, and the private sector to share resources, coordinate and manage incidents, and communicate information during threats, hazards, and events.

¹¹ NIMS defines the operational system, ICS, as a standardized approach to the command, control, and coordination of on-scene incident management that provides a common hierarchy within which personnel from multiple organizations can work effectively. ICS specifies an organizational structure for incident management that integrates and coordinates a combination of procedures, personnel, equipment, facilities, and communications.

¹² Incident Management Teams are groups of ICS-qualified personnel, consisting of an incident commander, other incident leadership, and personnel qualified for other key ICS positions. These teams may be assigned to manage incidents or to accomplish supporting incident-related tasks or functions. In these instances, the teams are typically delegated the authority to act on behalf of the affected jurisdiction or organization.



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ensure immigration processing services. Objectives were refined and added as the operation progressed. Another management plan, for the operational period November 30, 2021, through December 7, 2021, defined 10 objectives, including to achieve 36,500 safe haven departures by December 7, 2021, and to provide for the basic life services, safety, and security of sheltered Afghan guests, including base housing winterization, care for medically fragile guests, and education on civic rights and responsibilities.

Requirement 3: Coordinate with Federal, state, local, private sector, tribal, territorial, and nongovernmental entities

The UCG coordinated with Federal, state, local, private sector, and nongovernmental organizations (NGOs) in three primary ways: by creating specific UCG components to focus on external coordination, including Federal partners as part of the UCG, and holding regular collaborative meetings to discuss OAW issues. For example, the UCG created the Resettlement Branch to “coordinate and intersect with operational bureaus and offices to help overcome operational and policy challenges affecting resettlement” and to be a common point of contact for stakeholders and external partners related to resettlement capacity.

In addition, the UCG organization included representatives from multiple Federal agencies, including DoD, DOS, HHS, HUD, and the VA. Through these representatives, the UCG further coordinated with other entities such as state and local governments, private sector entities, and NGOs. As an example, UCG representatives from DOS and HHS coordinated directly with resettlement agencies¹³ to provide placement assistance and other resources to Afghan guests.

Finally, the UCG established a series of recurring meetings for OAW stakeholders, such as a UCG and DoD synchronization meeting to discuss Federal Coordinators’ critical needs and a UCG Senior Official meeting with representatives from several Federal agencies to discuss issues and concerns and to reach consensus on key decisions.

Requirement 4: Elevate and resolve applicable issues through the National Security Memorandum-2 Process

National Security Memorandum-2, *Renewing the National Security Council System* (NSM-2), dated February 4, 2021, describes the President’s direction for

¹³ A resettlement agency provides resettlement assistance and is the initial sponsor of a refugee entering the United States. Nine resettlement agencies contract with DOS to provide services such as reception, basic orientation, counseling, food, shelter, and health services to refugees.



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organization of the National Security Council (NSC) system to carry out national security policy. NSM-2 establishes the composition and purpose of the NSC and its various committees.¹⁴ The SRO met with NSC staff once a week and had a vote in the NSC Deputies Committee. The SRO noted that he had opportunities to bring issues up before the committee and get them resolved. Other UCG officials said that the UCG leveraged some NSC processes to resolve issues, especially in cases where differing opinions existed between the different OAW Federal agencies regarding OAW operations.

Requirement 5: Lead communication efforts with affected parties and the public

The UCG communicated with OAW stakeholders by holding regular internal and external meetings (as discussed previously) and by establishing an External Affairs Section and Situation Unit for information dissemination. For example, the External Affairs Section's objective was to "provide timely and accurate information to Afghan guests; Federal, State, local governmental officials; and private sector stakeholders regarding all phases of OAW operations." In addition, the Situation Unit within the Planning Section collected, compiled, and disseminated data and information related to the status of the safe havens and the Afghan guests in the resettlement process. The Situation Unit also distributed management plans to an email distribution list of approximately 400 representatives from several Federal agencies.

The UCG Experienced Staffing and Supply Shortages at the Beginning of OAW due to Inadequate Funding

The absence of direct funding at the initiation of the UCG was a significant challenge. The UCG faced difficulties creating its operational structure and staffing safe havens while simultaneously overseeing the resettlement of thousands of Afghans who had already arrived and were continuing to arrive in the United States. Approximately 31,000 Afghan guests had already arrived in the country by August 31, 2021, when the UCG was formed. According to UCG officials and staff, funding was one of the most significant challenges the UCG faced, ultimately resulting in problems recruiting essential staff and procuring necessary supplies and equipment. UCG and safe haven officials

¹⁴ NSM-2 states that (1) the NSC is the principal forum for consideration of national security policy issues requiring presidential determination; (2) the Principals Committee is the senior interagency forum for consideration of policy issues affecting national security; (3) the Deputies Committee reviews and monitors the work of the NSC interagency process and considers and, where appropriate, resolves policy issues affecting national security; and (4) Interagency Policy Committees are the main day-to-day forums for interagency coordination of national security policy.



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described the resettlement operation as “building the airplane as they were flying it.”

The UCG was established to coordinate the whole-of-government effort for the resettlement of thousands of Afghans in August 2021, but it did not receive direct funding to carry out its mission until December 2021. By that time, approximately 82,980 Afghan evacuees had already arrived in the United States, and approximately 35,970 were actively housed at safe havens. See Table 2 for the funding status of OAW for DHS during the first months of the operation.

Table 2. DHS OAW Funding Status

Date	Funding Status
August 30, 2021 – September 16, 2021	No OAW funding for DHS
September 17, 2021	DHS received \$67 million in drawdown authority from DOS to assist with OAW.* DOS drawdown authority allowed DHS to use its existing resources to assist with OAW but did not provide external funding for the UCG.
September 30, 2021	The <i>Extending Government Funding and Delivering Emergency Assistance Act</i> provided \$6.3 billion for OAW Federal agencies, but DHS received only \$193 million for U.S. Citizenship and Immigration Services.†
December 3, 2021	The <i>Further Extending Government Funding Act</i> provided approximately \$147 million in direct funding to the UCG for OAW activities.

Sources: DHS OIG analysis of UCG documents and 2021 appropriations acts

* DOS authorization of drawdown authority for DHS allowed DHS to repurpose up to \$67 million in existing inventory and resources to assist with OAW. On July 23, 2021, the President authorized DOS to direct the drawdown of up to \$200 million in supplies and services from the inventory and resources of Federal agencies to assist refugees, victims of conflict, and other persons at risk as a result of the situation in Afghanistan. Drawdowns give the President the flexibility to address U.S. foreign policy objectives, such as unforeseen emergencies, by providing assistance without first seeking additional legislative authority or appropriations from Congress.

† For OAW, U.S. Citizenship and Immigration Services adjudicated applications for employment authorization, conducted other immigration processing, and provided administrative support, including translation services, to expedite the processing of applications for immigrant status and work authorization.



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The UCG Had Difficulty Recruiting Staff

To carry out its mission to resettle vulnerable Afghans, the UCG was responsible for organizing its own operational structure and staffing safe havens with DHS personnel. Because DOS drawdown authority did not provide external funding for OAW, DHS components that provided personnel had to bear the cost of salaries and benefits, overtime, and travel. Accordingly, when DHS advertised these detail opportunities to its employees, the UCG did not have funding to reimburse components for the associated expenses. Moreover, because the OAW mission required significant overtime from the employees, the costs were a concern for DHS components. Sending an employee to assist with OAW took staff resources and funding away from the components' day-to-day missions.

Some components were reluctant to fund staff deployments, which limited the number of DHS employees at safe havens. As a result, DHS did not deploy enough staff to adequately support OAW at safe havens.¹⁵ Similarly, UCG officials noted that without funding, it was also difficult for the UCG to make a compelling case to other Federal agencies to deploy staff to assist with the operation.

The UCG was also limited in its ability to solicit employees with emergency management experience to assist with OAW. Specifically, it was difficult for the UCG to mobilize FEMA staff because OAW was not a presidentially declared emergency or major disaster, which could have provided funding under the *Robert T. Stafford Disaster Relief and Emergency Assistance Act* (Stafford Act).¹⁶ Because OAW was a non-Stafford Act event, there were restrictions on both the types of employees who could be deployed from FEMA and the amount of time certain FEMA employees could assist the OAW effort.

FEMA hires employees as either permanent, full-time under Title 5 of the U.S. Code¹⁷ or as part of cadre of on-call response/recovery or on-call FEMA reservists under the Stafford Act. Stafford Act employees can work on non-Stafford Act related activities, but the money must come out of non-Stafford Act funding and the employees are only able to help for up to 90 days. A UCG

¹⁵ DHS OIG Report OIG-22-54 (July 27, 2022), *DHS Did Not Adequately or Efficiently Deploy Its Employees to U.S. Military Installations in Support of Operation Allies Welcome*, discusses issues of DHS staffing of safe havens in detail.

¹⁶ Pub. L. No. 93-288, as amended, 42 U.S.C. § 5121 et seq. The Stafford Act constitutes the statutory authority for most Federal disaster response activities, especially as they pertain to FEMA and FEMA programs. The Stafford Act provides for two types of disaster declarations: emergency declarations and major disaster declarations. Both declaration types authorize the President to provide supplemental Federal disaster assistance.

¹⁷ Title 5 of the U.S. Code governs civil service positions in the Federal Government.



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official explained that it was hard to pull Stafford Act employees from FEMA because of challenges converting them for 90 days to non-Stafford Act employees, making sure they were done within 90 days, backfilling the positions for 90 days, and then telling FEMA there was no reimbursement. According to one UCG official, it was a “pitfall” that OAW was not a declared emergency or disaster because the UCG was not able to fully use the subject matter expertise of FEMA staff.

Because funding issues made it difficult to find DHS staff to fully support OAW, the UCG used various methods to staff the UCG and safe havens. One UCG official said there was a lot of “coaxing” to convince the components to allow their people to work on OAW. For example, a Federal Coordinator explained how Senior Executive Service relationships helped secure assistance. When a Border Patrol Chief did not initially want to provide help, the Federal Coordinator invited the chief on a safe haven tour to see the “dire straits.” The chief agreed to help after the tour. Another UCG official reported having to operate as a headhunter and make a lot of calls. The official said that sometimes the UCG did not find people until the day they were needed, and that “things mostly worked out because there was a lot of pushing.”

Several Federal Coordinators and other safe haven officials noted the severity of the staffing issues at safe havens. They said that requests to the UCG for safe haven staff went unanswered and unfulfilled, and many believed the UCG was unable to fulfill the requests due to a lack of funding. Safe haven officials shared examples of staffing issues at safe havens, including:

- repeatedly requesting a social services specialist, but instead having a dentist and Immigration and Customs Enforcement officer fulfill the role;
- needing critical positions such as mental health personnel and pharmacists to be filled, but instead having safe haven personnel obtain and transport medications;
- being short-staffed and having only 50 individuals providing COVID-19 vaccinations to 8,600 Afghan guests; and
- at times, having staff whose skill sets were not appropriate, such as using an AmeriCorps college freshman as public affairs staff.

We also learned that high turnover at the UCG may have negatively affected operations at the safe havens and other Federal agencies. For example, one safe haven official said that it felt like every week the safe haven was dealing with someone different from the UCG and that it was a burden to repeatedly have to explain the operation to someone new. Another official noted that turnover made “everyone’s job more difficult.” Similarly, one Federal agency representative said that having people rotating in and out every couple of



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months was “disorienting” because establishing working relationships takes time.

The UCG Had Difficulty Procuring Supplies and Equipment

At its initiation, the UCG had no money to set up or obtain supplies or equipment. Furthermore, when drawdown authority was received, it only allowed the use of existing supplies, equipment, and services. One UCG official noted that it was “absurd” that the UCG could not buy things at startup. This official rhetorically asked, “Why [was] I going to the FEMA closet to find notebooks and pens?”

Safe haven officials and staff also were challenged by the absence of funding for supplies and equipment. For example, at one safe haven, volunteers were told not to bring their own equipment, but when they arrived at the safe haven, there was no equipment for them to use. At that same safe haven, law enforcement officers had a mobile truck in which they could interview individuals in private, but there was no gas card for the truck. Another safe haven official said that staff brought their own laptops, printers, and scanners because resources were not generally available through OAW. For supplies such as paper, DHS staff sometimes asked the military staff what they could provide. Safe haven staff also brought supplies to the bases from their local field offices.

In some cases, the absence of direct funding for OAW activities resulted in staff using personal funds to cover expenses. One safe haven official said that prior to receiving direct funding in the December 3, 2021 appropriation, if staff did not bring office supplies with them to the safe haven, they had to drive to the local dollar store and get their own supplies, paying out of pocket. A Federal Coordinator observed that entry-level staff members who had been at the safe haven for 45 days had not been reimbursed and were paying their travel expenses out of pocket.

The UCG Experienced Operational Challenges and Confusion due to Perceived Authority Issues

According to UCG officials, another challenge for the UCG was operational authority. The Presidential and SRO Designation Memorandums established the UCG and the SRO as having the lead role for OAW Federal coordination efforts, but the SRO was not granted the authority to direct DHS components and other Federal agencies supporting OAW. We found that in some instances, the lines of authority for agencies supporting OAW activities were unclear,



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which led to confusion for UCG officials and Federal agencies regarding how to proceed with certain OAW activities.

The UCG Could Not Direct Other Federal Agencies' or DHS Components' Activities in Support of OAW

The Presidential and SRO Designation Memorandums did not give the UCG authority to issue orders to DHS components and Federal agencies, their officers, or their employees. Officials from the DHS Office of Strategy, Policy, and Plans said that by design, and consistent with both Federal law and longstanding domestic incident management policy, the SRO does not have directive authority over other departments and agencies. Instead, the SRO serves in an overall coordination role to ensure unity of effort across the operation. The SRO explained that with the UCG it took a lot more negotiation, persuasion, coordination, and soft skills to make things happen. If someone disagreed with an approach, the SRO could not direct them, because the UCG did not have authority or funding.

We found that the UCG's inability to direct DHS components or other Federal agencies may have particularly hindered its ability to address the staffing issues caused by the lack of OAW funding at the beginning of the operation. UCG officials said that they experienced problems persuading DHS components and other Federal agencies to provide detailed or volunteer staff to both the UCG and safe havens. One UCG official observed a link between funding and authority, noting that having money can allow you to "influence with a different posture, rather than trying to tell someone what to do with their money." Ultimately, when the UCG could not persuade DHS components and other Federal agencies to provide staff for the UCG and safe havens, the UCG and SRO could not direct these entities to action.

OAW Lines of Authority Were Unclear

Several UCG officials said that OAW brought many unique challenges to exercising authority across the Federal Government. UCG officials noted the lines of authority were not always clear; especially because OAW was not a Stafford Act event. One UCG official offered a significant lesson learned — the lines of authority need to be spelled out immediately when the organization is established, especially when using drawdown authority funds for specific missions.

Further, the SRO noted that with so many applicable legal authorities, the UCG was driven by "who had the authority to do things" instead of "off-the-shelf" standard operating procedures. For example, in addition to the



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requirements from the President and DHS Secretary, the UCG and other OAW Federal agencies had to adhere to requirements of authorities such as the *Immigration and Nationality Act of 1952*,¹⁸ the *Migration and Refugee Assistance Act of 1962*,¹⁹ and Presidential Policy Directive 44, *Enhancing Domestic Incident Response*.²⁰

UCG officials said they, at times, had difficulty determining which Federal agency had the specific authority to complete certain actions. For example, it was not immediately clear which agency had the authority or responsibility to transport Afghan guests who needed medical care outside of safe havens. The SRO said that he grew tired of dealing with the authority ambiguity and sent DHS vans to the safe havens with instructions to use them to provide the Afghan guests with transportation. Even within DHS components, some confusion about issues of authority surfaced. One UCG official described how miscommunication, misalignment, and limited clarity on who had the authority to deploy people to assist with OAW existed even between the UCG and the DHS Volunteer Force.²¹

The OAW UCG was structured differently from another recent UCG, and lines of authority were not as well defined. For the 2021 Solar Winds Cyber UCG,²² the NSC was the designated lead Federal entity and assigned Federal agencies to specific areas of incident management, such as threat response and intelligence support. DHS' Cybersecurity and Infrastructure Security Agency was the lead Federal agency for asset response within this UCG. By contrast, for OAW, DHS was designated as the lead Federal agency, but there was no one component within DHS designated to lead the effort. As a result, UCG Federal

¹⁸ The *Immigration and Nationality Act of 1952*, Pub. L. No. 82-414, 66 Stat. 163 (8 U.S.C. § 1101 et seq.), contains Federal provisions of immigration law such as visa, asylum, and naturalization requirements, as well as related duties for DOS and HHS.

¹⁹ The *Migration and Refugee Assistance Act of 1962*, Pub. L. No. 87-510, 76 Stat. 121 (22 U.S.C. § 2601 et seq.), allowed Congress to provide monetary assistance to refugees and extended the terms of the Fair Share Refugee Act.

²⁰ Presidential Policy Directive 44, *Enhancing Domestic Incident Response*, signed Nov. 7, 2016, enhances the ability of the Federal Government to respond to domestic incidents by providing for the timely identification of a lead Federal agency, when appropriate, and by ensuring that an appropriate incident management capability is available to support Federal domestic incident response efforts.

²¹ The DHS Volunteer Force was activated as a temporary, Federal-wide volunteer force to assist U.S. Customs and Border Protection in responding to the 2021 Southwest border migration surge. However, the Volunteer Force can also be used to staff and support other non-Stafford Act incidents as needed.

²² The NSC set up this UCG to coordinate the investigation and remediation of a significant cyber incident involving the Solar Winds' Orion product, which affected Federal Government networks.



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agency representatives perceived that lines of authority and responsibility lacked clarity.

Recent work from the DoD Office of Inspector General corresponds with our finding that lines of authority were not always clear. In a March 2022 report, DoD OIG found that DoD did not have comprehensive memorandums of agreement (MOA) with DHS, the lead Federal agency overseeing OAW.²³ Officials from the DoD Office of the Under Secretary of Defense for Policy explained that they had attempted to establish MOAs with DOS, instead of with DHS, the lead Federal agency, because they believed aspects of the OAW response to be a DOS mission. The report further found that none of the eight safe havens visited had signed safe haven-level MOAs with DHS. DoD OIG ultimately determined that the lack of MOAs caused confusion over the roles and responsibilities of DoD, DOS, and DHS personnel, hampering the effectiveness of DoD safe haven operations.

Conclusion

As the lead Federal agency for OAW, DHS established the UCG to coordinate the Federal Government's effort to resettle tens of thousands of vulnerable Afghans in the United States. This report highlights lessons learned from DHS' leadership of OAW during Phase 1 of the operation. These lessons may inform DHS' establishment of UCGs for future non-Stafford Act events. During OAW Phase 1, the UCG resettled approximately 74,190 Afghans in the United States in accordance with the President's directive, but the absence of direct funding and clear lines of authority affected the UCG's operations. DHS can better prepare for future UCGs responding to non-Stafford Act events by proposing to Congress a contingency fund to allow such UCGs to receive initial funding necessary to develop the organizational structure and pay for support staff and supplies until additional funding sources are identified. In addition, to minimize confusion regarding lines of authority, DHS should develop clear, DHS-specific authority guidance for future DHS-led UCGs involving coordination across multiple Federal agencies.

Recommendations

We recommend the Under Secretary for Management:

Recommendation 1: In preparation for establishing a UCG, propose that Congress create a contingency fund to allow UCG officials to set up the internal

²³ Report No. DODIG-2022-066, *Management Advisory on the Lack of Memorandums of Agreement for DoD Support for the Relocation of Afghan Nationals*, issued Mar. 1, 2022.



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organization, including funding, when directed funding is not available via disaster aid, Stafford Act funds, congressional appropriations, or other means.

We recommend the Under Secretary for the Office of Strategy, Policy, and Plans:

Recommendation 2: Develop and implement DHS-specific guidance on lines of authority for future UCGs formed for events requiring government-wide coordination.

Management Comments and OIG Analysis

In response to our draft report, DHS officials concurred with our two recommendations. Appendix B contains DHS' management response in its entirety. We also received technical comments on the draft report and made revisions as appropriate. We consider both recommendations resolved and open. A summary of DHS' response and our analysis follows.

DHS Response to Recommendation 1: Concur. DHS noted it does not have the statutory authority needed to create a specific contingency fund for future efforts similar to OAW using DHS funding when directed funding is not available. However, the DHS Office of the Chief Financial Officer will work with the U.S. Office of Management and Budget to pursue funding and authorization for a non-Stafford Act contingency fund in the fiscal year 2024 budget cycle and future budget cycles, as appropriate.

OIG Analysis: We consider these actions responsive to the recommendation, which we consider resolved and open. We will close this recommendation when DHS submits documentation confirming the request for a non-Stafford Act contingency fund in the DHS budget for future fiscal years.

DHS Response to Recommendation 2: Concur. DHS indicated the Office of Strategy, Policy, and Plans is using lessons learned from recent incidents, including OAW, to clarify and institutionalize UCG policies, processes, and capabilities, and will work to implement these improvements, as appropriate, by the end of fiscal year 2023.

OIG Analysis: We consider these actions responsive to the recommendation, which we consider resolved and open. We will close this recommendation when DHS submits documentation confirming the implementation of DHS-specific guidance on lines of authority for future UCGs formed for events requiring government-wide coordination.



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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*.

The objective of this evaluation was to review DHS' leadership of OAW, including administration of the UCG, coordination of Federal agencies' OAW activities, and general oversight of the Afghan resettlement process.

To answer our objective, we conducted interviews with officials and staff from different UCG components, including command staff, Federal Coordinators and other DHS support staff from safe havens, DHS officials from DHS Headquarters, and UCG representatives from other OAW Federal agencies. We also reviewed documents including management plans, daily reports, OAW funding and expenditure documents, and UCG policies. Finally, we participated in site visits at two Virginia safe havens housing Afghan guests — Marine Corps Base Quantico and Fort Pickett.

We conducted our fieldwork between November 2021 and April 2022 under the authority of 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.



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Appendix B
DHS Comments to the Draft Report

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



September 20, 2022

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

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

SUBJECT: Management Response to Draft Report: “The DHS UCG for Operation Allies Welcome Coordinated Afghan Resettlement but Faced Challenges in Funding and Authority” (Project No. 22-003-ISP-DHS)

JIM H
CRUMPACKER
Digitally signed by JIM H
CRUMPACKER
Date: 2022.09.20
15:59:06 -04'00'

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.

Department leadership is pleased to note OIG’s recognition that, in response to an August 29, 2021, memorandum¹ designating DHS as the lead Federal agency for Operation Allies Welcome (OAW), the Unified Coordination Group (UCG) coordinated the resettlement of approximately 74,190 vulnerable Afghans from August 2021 through February 2022. DHS is proud to have supported OAW, which was an unprecedented whole-of-government effort, during which the United States government facilitated the relocation of Afghans whose lives were at risk. DHS remains committed to working with immigration, resettlement, intelligence, law enforcement, and counterterrorism professionals across multiple Federal departments and agencies, as appropriate, to complete this mission.

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

¹ <https://www.whitehouse.gov/briefing-room/statements-releases/2021/08/29/memorandum-on-the-designation-of-the-department-of-homeland-security-as-lead-federal-department-for-facilitating-the-entry-of-vulnerable-afghans-into-the-united-states/>



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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.

Enclosure



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**Enclosure: Management Response to Recommendations
Contained in 22-003-ISP-DHS**

OIG recommended that the Acting Under Secretary for Management:

Recommendation 1: In preparation for establishing a UCG, DHS should propose that Congress create a contingency fund to allow UCG officials to set up the internal organization, to include funding, when directed funding is not available via disaster aid, Stafford Act funds, congressional appropriations, or other means.

Response: Concur. DHS does not have the statutory authority needed to create a specific contingency fund for future efforts similar to OAW using DHS funding when directed funding is not available. However, the DHS Office of the Chief Financial Officer will work with the U.S. Office of Management and Budget to pursue funding and authorization for a non-Stafford Act contingency fund in the fiscal year (FY) 2024 budget cycle and future budget cycles, as appropriate. Estimated Completion Date (ECD): March 31, 2023.

OIG recommended that the Under Secretary for the Office of Strategy, Policy, and Plans (PLCY):

Recommendation 2: Develop and implement DHS-specific guidance on lines of authority for future UCGs formed for events requiring government-wide coordination.

Response: Concur. Using lessons learned from recent incidents, including OAW, PLCY is working with DHS Components, and the interagency, to clarify and institutionalize UCG policies, processes, and capabilities, and will work to implement these improvements, as appropriate, by the end of FY 2023. ECD: September 29, 2023.



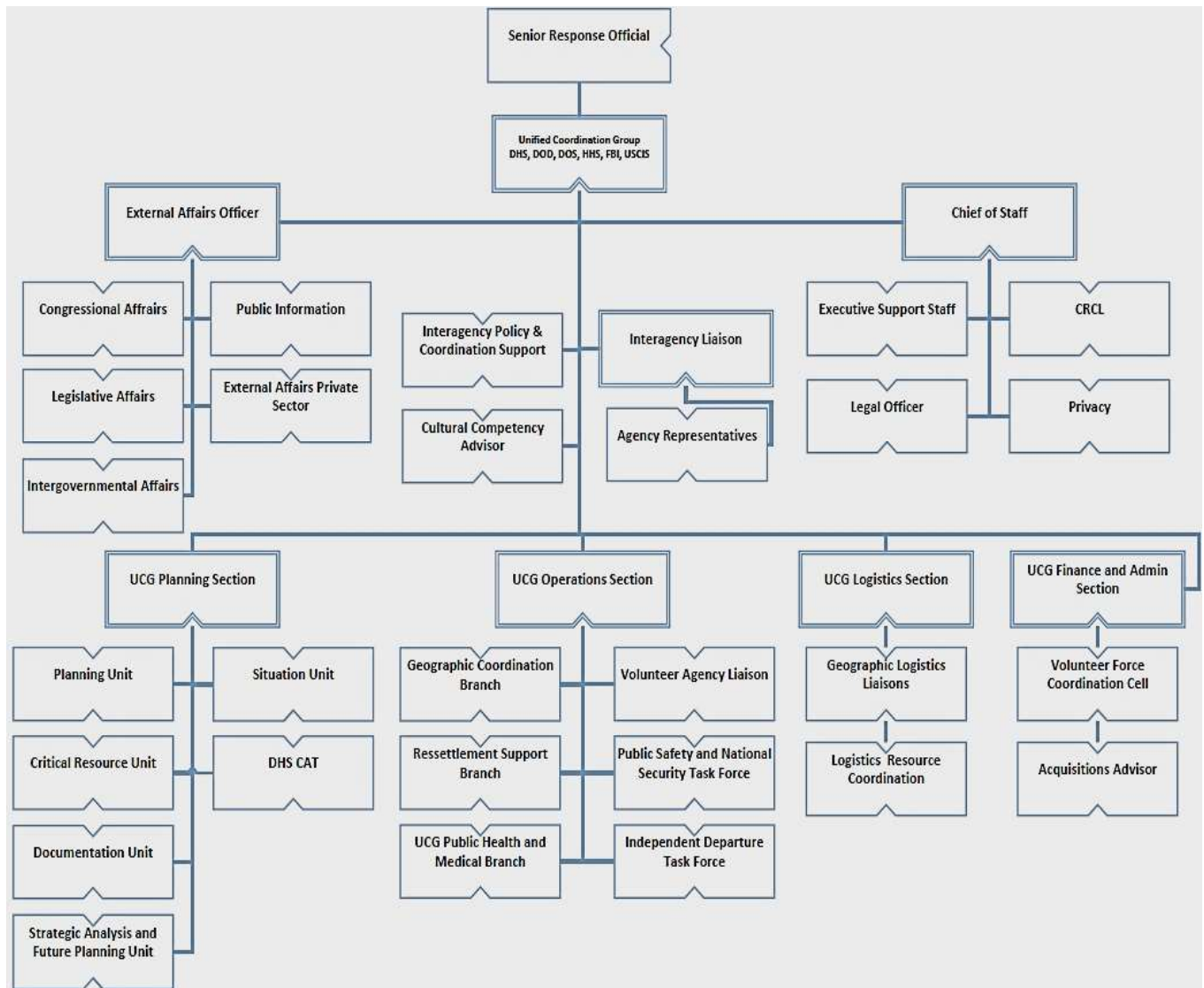
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Appendix C

UCG Organization Chart

Note: This organization chart does not include Federal Coordinators and other safe haven officials and staff.



Source: October 15–19, 2021 UCG Management Plan



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Appendix D
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Appendix E
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