

OFFICE OF INSPECTOR GENERAL

DHS' Progress in Implementing the Federal Information Technology Acquisition Reform Act



Homeland
Security

**October 21, 2016
OIG-16-138 (revised)**



DHS OIG HIGHLIGHTS

DHS' Progress in Implementing the Federal Information Technology Acquisition Reform Act

October 21, 2016

Why We Did This Audit

In 2012, we reported on DHS' challenges in implementing an effective information technology (IT) management program. FITARA was enacted in 2014 to institutionalize IT reform across the Federal Government. We conducted this audit to determine the extent to which DHS has implemented FITARA to improve department-wide IT management and oversight.

What We Recommend

We made three recommendations to the DHS CIO to ensure effective implementation of the authorities and reporting requirements of FITARA.

For Further Information:

Contact our Office of Public Affairs at (202) 254-4100, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

The Department of Homeland Security (DHS) reported substantial progress implementing the *Federal Information Technology Acquisition Reform Act* (FITARA) to improve department-wide IT management and oversight. As of April 2016, DHS stated it had implemented 11 of the 17 required FITARA elements to enhance the Chief Information Officer's (CIO) budget, acquisition, and organizational authority. Milestones have been established to fulfill the remaining six elements by March 2018. The reported progress was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration. Such actions have resulted in department-wide IT management enhancements and policy revisions, although the outcome of these actions could not yet be measured at the time of our review.

The Department must take additional steps to improve IT investment transparency, risk management, and review and reporting processes in line with FITARA. The CIO office has implemented several key enhancements, such as updating the agency-wide IT portfolio review process. However, other requirements such as reporting on the use of incremental development and conducting program reviews of high-risk investments were not fully met. These shortfalls were due, in part, to incomplete departmental processes to ensure compliance. Until these requirements are fully implemented, DHS will be challenged to ensure accurate reporting on adoption of incremental development and timely reviews of its high-risk IT investments.

DHS Response

The DHS CIO concurred with our recommendations.



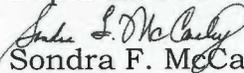
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Department of Homeland Security

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

October 21, 2016

MEMORANDUM FOR: Luke J. McCormack
Chief Information Officer
Department of Homeland Security

FROM: 
Sondra F. McCauley
Assistant Inspector General
Office of Information Technology Audits

SUBJECT: *DHS' Progress in Implementing the Federal Information
Technology Acquisition Reform Act (OIG-16-138)*

Attached for your information is our revised final report, *DHS' Progress in Implementing the Federal Information Technology Acquisition Reform Act (FITARA)*. We reissued the report with revisions to clarify in the Highlights and Results of Audit sections that reported DHS progress in FITARA implementation was based on *DHS 2016 FITARA Self-Assessment*, which was submitted to the Office of Management and Budget on April 29, 2016. We also make it clear in our revised Objective, Scope, and Methodology section that, because FITARA implementation was in an early phase and continuously changing during our field work, we did not take steps to verify the information the Department reported. These revisions do not change the overall findings or recommendations in the report. Please see the attached errata sheet for details.

Please call me with any questions, or your staff may contact Kristen Bernard, Director, Information Technology Management Division, at (202) 254-0962.

Attachment

Errata page for OIG-16-138

DHS' Progress in Implementing the Federal Information Technology Acquisition Reform Act

Change made to the DHS OIG Highlights section, 1st paragraph, 1st sentence (see below):

Changed from:

The Department of Homeland Security (DHS) has made significant progress implementing the *Federal Information Technology Acquisition Reform Act (FITARA)* to improve department-wide IT management and oversight.

Changed to:

The Department of Homeland Security (DHS) reported substantial progress implementing the *Federal Information Technology Acquisition Reform Act (FITARA)* to improve department-wide IT management and oversight.

Change made to the DHS OIG Highlights section, 1st paragraph, 2nd sentence (see below):

Changed from:

Since August 2015, DHS has fully implemented 11 of the 17 required FITARA elements to enhance the Chief Information Officer's (CIO) budget, acquisition, and organizational authority.

Changed to:

As of April 2016, DHS stated it had implemented 11 of the 17 required FITARA elements to enhance the Chief Information Officer's (CIO) budget, acquisition, and organizational authority.

Change made to the DHS OIG Highlights section, 1st paragraph, 4th sentence (see below):

Changed from:

The progress made was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration.

Changed to:

The reported progress was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration.

Change made to the Results of Audit section, page 8, 1st paragraph, 1st sentence (see below):

Changed from:

DHS has made significant progress implementing FITARA to improve department-wide IT management and oversight.

Changed to:

DHS reported substantial progress implementing FITARA to improve department-wide IT management and oversight.

Change made to the Results of Audit section, page 8, 1st paragraph, 2nd sentence (see below):

Changed from:

Since August 2015, DHS has fully implemented 11 of the 17 required FITARA elements to enhance CIO's budget, acquisition, and organizational authority.

Changed to:

As of April 2016, DHS stated it had implemented 11 of the 17 required FITARA elements to enhance CIO's budget, acquisition, and organizational authority.

Change made to the Results of Audit section, page 8, 1st paragraph, 4th sentence (see below):

Changed from:

The progress made was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration.

Changed to:

The reported progress was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration.

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 8, 1st paragraph, 1st sentence (see below):

Changed from:

The Department made significant progress in implementing many of the 17 CIO responsibilities identified in OMB's Common Baseline for IT Management, outlined earlier in table 1.

Changed to:

The Department reported substantial progress in implementing many of the 17 CIO responsibilities identified in OMB's Common Baseline for IT Management, outlined earlier in table 1.

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 8, 1st paragraph, 2nd sentence (see below):

Changed from:

As of April 30, 2016, DHS had fully implemented 11 elements and had partially implemented the remaining 6 elements.

Changed to:

In its April 30, 2016 self-assessment, DHS stated it had fully implemented 11 elements and had partially implemented the remaining 6 elements.

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 8, 1st paragraph, 4th sentence (see below):

Changed from:

(For a complete status of DHS' progress in implementing the Common Baseline, see appendix C.)

Changed to:

(For a complete status of DHS' reported progress in implementing the Common Baseline, see appendix C.)

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 9, Table 2, Table Title (see below):

Changed from:

Table 2. Implementation Progress as of April 2016

Change to:

Table 2. DHS Assessment of FITARA Implementation Progress as of April 2016

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 9, Table 2, Table Source (see below):

Changed from:

Source: OIG-generated from OCIO data

Change To:

Source: OIG-generated from DHS' 2016 FITARA Self-Assessment

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 9, 2nd paragraph, 4th sentence (see below):

Changed from:

By that time, OCIO had completed 109 of the 131 required actions and had defined milestones for completing the remaining 22 actions by March 2018, as shown in table 3.

Change to:

By that time, OCIO reported it had completed 109 of the 131 required actions and had defined milestones for completing the remaining 22 actions by March 2018, as shown in table 3.

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 10, Table 3, Table Title (see below):

Changed from:

Table 3. Milestones for Completion of the Remaining 22 Action Items

Change to:

Table 3. DHS Milestones for Completing the Remaining 22 Action Items

Change made to the Progress in Enhancing CIO Authorities under FITARA section, page 10, Table 3, Table Source (see below):

Changed from:

Source: OIG-generated from OCIO data

Change to:

Source: OIG-generated from DHS' 2016 FITARA Self-Assessment

Change made to the FITARA Implementation Progress Ensured by Focused OCIO Approach section, page 10, 1st paragraph, 1st sentence (see below):

Changed from:

DHS progress in implementing FITARA was attributable to efforts by OCIO personnel to establish a FITARA Implementation Team and ensure department-wide collaboration.

Change to:

DHS' reported progress in implementing FITARA was attributable to efforts by OCIO personnel to establish a FITARA Implementation Team and ensure department-wide collaboration.

Change made to the FITARA Implementation Has Resulted in Documented Enhancements, But Few Realized Benefits to Date section, page 12, 2nd paragraph, 1st sentence (see below):

Changed from:

In March 2016, OCIO personnel also restructured the steps in the Budget Execution phase to increase the DHS CIO's visibility of IT reprogramming requests.

Change to:

In March 2016, OCIO personnel also reported restructuring steps in the Budget Execution phase to increase the DHS CIO's visibility of IT reprogramming requests.

Change made to the Appendix A: Objective, Scope, and Methodology, page 22, 3rd paragraph, 3rd sentence (see below):

Sentences added:

We obtained DHS' report to OMB on its progress in implementing FITARA. Because implementation was in an early phase and continuously changing, we did not take steps to verify the information at that time, but will conduct a follow-up verification audit at a later date.

Change made to the Appendix C: DHS' Common Baseline Implementation Status, page 26, Table Source (see below):

Changed from:

Source: OIG-generated from DHS OCIO data

Change to:

Source: OIG-generated from DHS' 2016 FITARA Self-Assessment



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Department of Homeland Security

Table of Contents

Background 2

Results of Audit 8

 Progress in Enhancing CIO Authorities under FITARA 8

 Recommendations 16

 IT Investment Review and Reporting Functions Need Additional
 Improvement 18

 Recommendations 20

Appendixes

Appendix A: Objective, Scope, and Methodology 22

Appendix B: DHS Comments to the Draft Report 24

Appendix C: DHS' Common Baseline Implementation Status 26

Appendix D: Office of IT Audits Major Contributors to This Report 27

Appendix E: Report Distribution 28

Abbreviations

CIO	Chief Information Officer
EBMO	Enterprise Business Management Office
FITARA	Federal Information Technology Acquisition Reform Act
IT	information technology
OCIO	Office of the Chief Information Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget



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Background

The *Homeland Security Act of 2002*,¹ as amended, established the position of the DHS Chief Information Officer (CIO). The primary mission of the DHS CIO, as outlined in the 2014 DHS Information Technology Integration and Management Directive, is to oversee and manage all Department information technology (IT) systems and to establish IT priorities, policies, processes, standards, guidelines, and procedures.² The CIO governs across the 22 component agencies to ensure that technologies and services are in place and effectively managed to meet the Department's mission needs.

DHS components rely heavily on IT to perform a wide range of mission operations, including counterterrorism, border security, and emergency response. To support its mission operations in fiscal year 2016, DHS had an IT budget of approximately \$6.2 billion, representing approximately 15 percent of the overall DHS budget of nearly \$41 billion. Given the size and significance of this investment, effective management of IT programs and expenditures is critical.

The DHS CIO reports to the Under Secretary for Management and is supported by the Office of the CIO (OCIO), which administers the Department's IT infrastructure, applications, services, and management functions. OCIO is responsible for ensuring that DHS' approximately 240,000 employees remain connected to the Department's IT infrastructure environment and receive the needed operational support. Figure 1 shows the current DHS OCIO organizational structure.

¹ Public Law 107-296

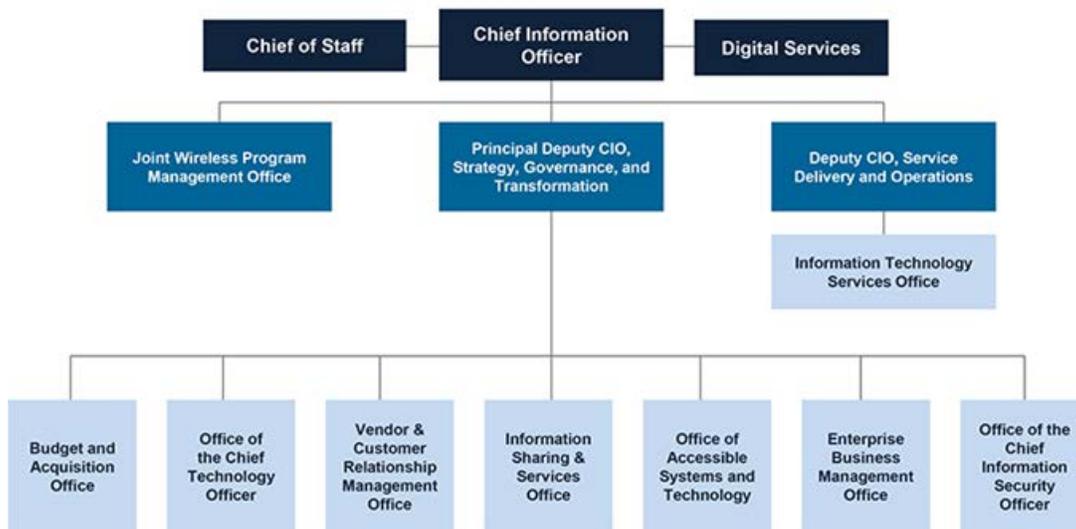
² DHS Directive 142-02, *Information Technology Integration and Management*, February 6, 2014



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Figure 1. DHS OCIO Organizational Structure



Source: DHS website

Federal statutes and regulations provide guidance for establishing an effective IT management structure, which is increasingly critical to Federal agency success. The *Clinger-Cohen Act of 1996* requires that Federal agencies establish a CIO to institute, guide, and oversee frameworks for managing IT agency-wide.³ Additionally, the Act gives agency CIOs the responsibility for advising the agency head on whether IT programs and projects should be continued, modified, or terminated, as well as overseeing the acquisition of IT resources. However, despite the CIO authorities granted, the continuance of duplicative, wasteful, and low-value investments have highlighted the need to further strengthen IT management and governance practices across the Federal Government.

Further, the Office of Management and Budget (OMB) implemented a series of Federal IT reform initiatives beginning in 2009. These initiatives included:

- Federal IT Dashboard – a public website providing performance updates and supporting data for major IT investments.⁴
- TechStat Accountability Sessions – a framework for OMB and agency leadership to use to conduct IT program reviews.⁵

³ Public Law 104-106

⁴ The IT Dashboard was launched on June 1, 2009, to provide Federal agencies and the public the ability to view details on IT investments online and to track their progress over time.

⁵ OMB Memorandum 10-31, *Immediate Review of Information Technology Projects*, July 28, 2010



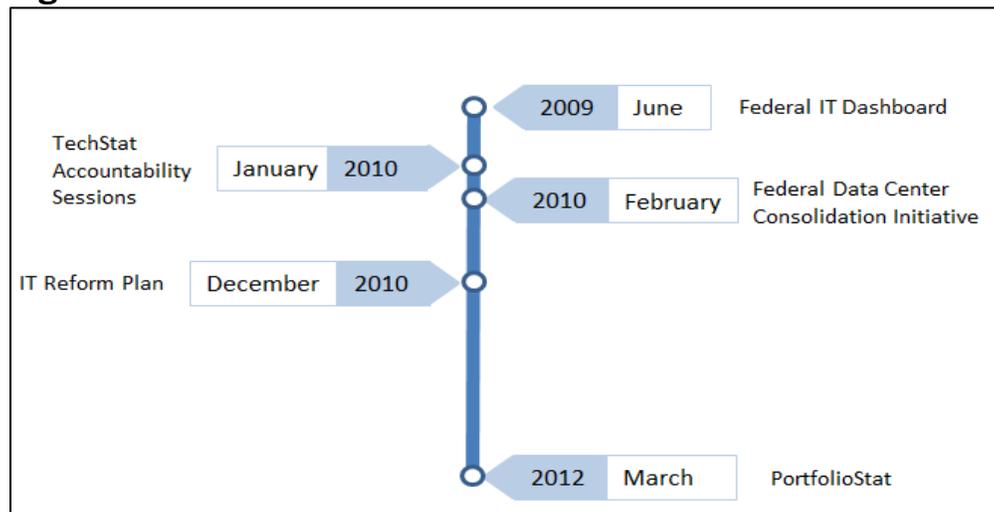
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- Federal Data Center Consolidation Initiative – an effort to reduce redundancy and inefficiency among the growing number of data centers across the Federal Government.⁶
- IT Reform Plan – an initiative by the Federal CIO to improve IT acquisitions and operational efficiencies, and to deliver more IT value to the taxpayer.⁷
- PortfolioStat – a standard approach for agencies to conduct annual, agency-wide IT portfolio reviews to reduce commodity IT spending and demonstrate how IT investments align with agency mission and business functions.⁸

The timeline in figure 2 shows when OMB enacted these initiatives.

Figure 2. IT Reform Initiatives Timeline



Source: DHS Office of Inspector General (OIG)-generated using OMB IT reform guidance

Although these initiatives increased IT governance capabilities across the Federal Government, management deficiencies remained. Recognizing a need for additional reform in government-wide IT management, Congress enacted the *Federal Information Technology Acquisition Reform Act* (FITARA) in December 2014.⁹ This legislation was intended to create more enduring improvements to Federal agency IT management practices and build upon the CIO responsibilities outlined in the *Clinger-Cohen Act*.

⁶ Federal CIO Memorandum, *Federal Data Center Consolidation Initiative*, February 26, 2010

⁷ Federal CIO's *25-Point Implementation Plan to Reform Federal Information Technology Management*, December 9, 2010

⁸ OMB Memorandum 12-10, *Implementing PortfolioStat*, March 30, 2012

⁹ Public Law 113-291.



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FITARA requirements are separated into unique but interrelated elements intended to institutionalize previous reform initiatives and significantly improve the overall management and governance of IT across the Federal Government. The key elements of FITARA are:

- Agency CIO Authority Enhancements
- Enhanced Transparency and Improved Risk Management
- Portfolio Review
- Federal Data Center Consolidation Initiative
- Expansion of Training and Use of IT Cadres
- Maximizing the Benefit of the Federal Strategic Sourcing Initiative
- Government-wide Software Purchasing Program

In June 2015, OMB released implementation guidance in a memorandum, *Management and Oversight of Federal Information Technology*, to help agencies align their IT resources with specific FITARA requirements.¹⁰ This guidance was intended to:

- establish government-wide IT management controls that meet FITARA requirements, while providing agencies with the flexibility to adapt to unique internal requirements and processes;
- clarify the CIO's role and strengthen the relationship between agency and bureau CIOs; and
- strengthen CIO accountability for IT cost, schedule, performance, and security.

OMB's June 2015 memorandum also identified specific IT management controls, referred to as the Common Baseline for IT Management, to enhance CIO authority and accountability.¹¹ As shown in table 1, the Common Baseline included 17 specific responsibilities across 4 main areas of CIO authority: (1) Budget Formulation; (2) Budget Execution; (3) Acquisition; and (4) Organization and Workforce. The Common Baseline also addressed the roles and responsibilities of other Senior Agency Officials engaged in IT investment oversight.

¹⁰ OMB Memorandum 15-14, *Management and Oversight of Federal Information Technology*, June 10, 2015

¹¹ OMB Memorandum 15-14, *Management and Oversight of Federal Information Technology*, June 10, 2015, Attachment A: *Common Baseline for IT Management and CIO Assignment Plan* provides descriptions for each of the 17 required capabilities, identified by letters "A" through "Q" explaining the roles and responsibilities for CIOs as well as other Senior Agency Officials.



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Table 1. OMB’s Common Baseline for IT Management

Common Baseline for IT Management 17 Required Elements	
Category	Requirement
Budget Formulation	A. Visibility of IT resources
	B. CIO role in pre-budget submission
	C. CIO role in planning program management
	D. CIO role in budget request
Budget Execution	E. Ongoing CIO engagement with program managers
	F. Visibility of IT planned expenditure reporting to CIO
	G. CIO defines IT processes and policies
	H. CIO role on program governance boards
	J. CIO role in recommending modification, termination, or pause of IT
Acquisition	L. CIO approval of reprogramming
	I. Shared acquisition and procurement responsibilities
Organization and Workforce	K. CIO review and approval of acquisitions
	M. CIO approves new bureau CIOs
	N. CIO role in ongoing bureau CIOs’ evaluations
	O. Bureau IT Leadership Directory
	P. IT Workforce
	Q. CIO reports to agency head (or deputy/Chief Operating Officer)

Source: OIG-generated from OMB guidance

OMB’s guidance for implementing the Common Baseline includes three primary actions for agencies to perform in 2015 and 2016:

- Complete a self-assessment and implementation plan for submission to OMB by August 15, 2015.
- Fully implement Common Baseline responsibilities by December 31, 2015.
- Conduct annual reviews and updates to the self-assessment, with the first update to OMB on April 30, 2016, and subsequent updates due April 30th of each year.

IT reform is needed to help DHS create a unified IT infrastructure for effective department-wide IT management. Since its inception in 2003, the Department has faced longstanding challenges in the areas of CIO authority and IT investment management. We have issued three reports to help the Department improve in these areas.



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- In 2004, we reported that the DHS CIO was not a member of the senior management team with the authority to strategically manage department-wide IT assets and programs. We recommended that, among other things, the Deputy Secretary assign the CIO a key role in all levels of the Department's investment review process.¹²
- In 2008, we reported that ongoing staffing shortages and inconsistent IT budget practices continued to impede progress and hinder the CIO's ability to ensure IT management practices. We recommended that the CIO update the OCIO staffing plan, and develop comprehensive budget and strategic plans aligned with DHS' mission.¹³
- In 2012, we reported that the CIO had increased oversight and authority of IT. However, budget review process improvements were needed to enable the CIO to identify and resolve issues before IT investments were finalized. We recommended that the Deputy Under Secretary for Management assign the CIO centralized control over the Department's IT budget planning process.¹⁴

¹² *Improvements Needed to DHS' Information Technology Management Structure*, OIG-04-30, July 2004

¹³ *Progress Made in Strengthening DHS Information Technology Management, But Challenges Remain*, OIG-08-91, September 2008

¹⁴ *DHS Information Technology Management Has Improved, But Challenges Remain*, OIG-12-82, May 2012



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Results of Audit

DHS reported substantial progress implementing FITARA to improve department-wide IT management and oversight. As of April 2016, DHS stated it had implemented 11 of the 17 required FITARA elements to enhance CIO's budget, acquisition, and organizational authority. Milestones have been established to fulfill the remaining six elements by March 2018. The reported progress was largely due to the focused efforts of CIO office personnel to establish a FITARA Implementation Team and ensure DHS-wide collaboration. Such actions have resulted in department-wide IT management enhancements and policy revisions, although the outcome of these actions could not yet be measured at the time of our review.

The Department must take additional steps to improve IT investment transparency, risk management, and review and reporting processes in line with FITARA. The CIO office has implemented several key enhancements, such as updating the agency-wide IT portfolio review process. However, other requirements such as reporting on the use of incremental development and conducting program reviews of high-risk investments were not fully met. These shortfalls were due, in part, to incomplete departmental processes to ensure compliance. Until these requirements are fully implemented, DHS will be challenged to ensure accurate reporting on adoption of incremental development and timely reviews of its high-risk IT investments.

Progress in Enhancing CIO Authorities under FITARA

The Department reported substantial progress in implementing many of the 17 CIO responsibilities identified in OMB's Common Baseline for IT Management, outlined earlier in table 1. In its April 30, 2016 self-assessment, DHS stated it had fully implemented 11 elements and had partially implemented the remaining 6 elements. As shown in table 2, the Department's most substantial progress was in the area of budget formulation, which entailed ensuring visibility over IT resources and a CIO role in budget submissions, planning, and requests. (For a complete status of DHS' reported progress in implementing the Common Baseline, see appendix C.)



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Table 2. DHS Assessment of FITARA Implementation Progress as of April 2016

Common Baseline Area of CIO Authority	Total Number of Elements	Number of Elements Partially Addressed	Number of Elements Fully Implemented
Budget Formulation	4	0	4
Budget Execution	6	3	3
Acquisition	2	2	0
Organization and Workforce	5	1	4
Total	17	6	11

Source: OIG-generated from DHS' 2016 FITARA Self-Assessment

In August 2015, the Department completed an initial FITARA Common Baseline Self-Assessment and Plan, also as required by OMB.¹⁵ One key element of this plan was establishing a baseline by which to measure alignment with each of the 17 specific requirements. To perform this measurement, OCIO personnel reviewed their existing IT management policy documents, standard operating procedures, and documented processes to identify which of the 17 required capabilities were already in place. The Department concluded that it had 3 elements fully implemented and 14 elements partially implemented at that time.

The Department's initial 2015 self-assessment and plan also identified specific actions needed to fully implement each of the 17 Common Baseline elements. OMB approved this plan in October 2015 and agreed with the current status, actions, and target dates the Department had identified. In April 2016, the Department conducted its first annual review and update of the self-assessment. By that time, OCIO reported it had completed 109 of the 131 required actions and had defined milestones for completing the remaining 22 actions by March 2018, as shown in table 3.

¹⁵ DHS FITARA Common Baseline Self-Assessment and Plan, August 15, 2015



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Department of Homeland Security

Table 3. DHS Milestones for Completing the Remaining 22 Action Items

Common Baseline Area of CIO Authority	Number of Action Items Completed	Number of Action Items Outstanding	Target Completion Timeframe
Budget Formulation	40	1	May 2016
Budget Execution	40	2	May – September 2016
Acquisition	18	9	May – December 2016
Organization and Workforce	11	10	May 2016 – March 2018
Total	109	22	

Source: OIG-generated from DHS’ 2016 FITARA Self-Assessment¹⁶

FITARA Implementation Progress Ensured by Focused OCIO Approach

DHS’ reported progress in implementing FITARA was attributable to efforts by OCIO personnel to establish a FITARA Implementation Team and ensure department-wide collaboration. The team was put in place in April 2015 to lead and manage the execution and coordination of all FITARA implementation activities. The Executive Director of the OCIO Enterprise Business Management Office (EBMO) oversees this team, which is comprised of five Directors and four supporting staff. Team activities included defining, assigning, and completing the 131 actions listed in OCIO’s FITARA implementation plan. The team documented “as-is” processes, collaborated with subject matter experts, reviewed existing policies, and drafted documents needed to support FITARA implementation.

Further, the implementation team effectively collaborated with Chief Executives Offices and department-wide stakeholders to carry out implementation efforts. For example, the team conducted weekly working group sessions with these stakeholders to redesign business processes and update policies. The team also established a FITARA Component Integrated Planning Team as a formal mechanism to work with component CIOs. Starting in November 2015, 13 component CIOs had appointed representatives to serve as members of the integrated planning team and as points of contact for weekly coordination meetings with the FITARA Implementation Team.

¹⁶ Table 3 represents the status of action items as of the Department’s formal FITARA self-assessment and update submitted to OMB on April 30, 2016. We did not verify the status of action items scheduled for completion in May 2016, just after the end of our fieldwork. The one outstanding action item related to budget formulation pertained to a pilot initiative that was not considered essential for achieving full implementation of the FITARA budget formulation elements.



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Department of Homeland Security

FITARA Implementation Has Resulted in Documented Enhancements, But Few Realized Benefits to Date

By April 2016, OCIO's implementation efforts had resulted in much-needed revisions to department-wide IT management processes and policy. Specifically, OCIO had documented updates to various processes and policies to enhance CIO authority in the Common Baseline areas of IT budget formulation, budget execution, acquisition, and organization and workforce. However, these updates were largely improvements on paper, with measurable outcomes not yet evident, as of the completion of our fieldwork. Until the FITARA improvements are fully executed with performance measures in place to ensure their effectiveness, the Department will be hampered by the IT budget and acquisition challenges we have reported on since DHS' inception in 2003.

Updates to IT Processes and Policies

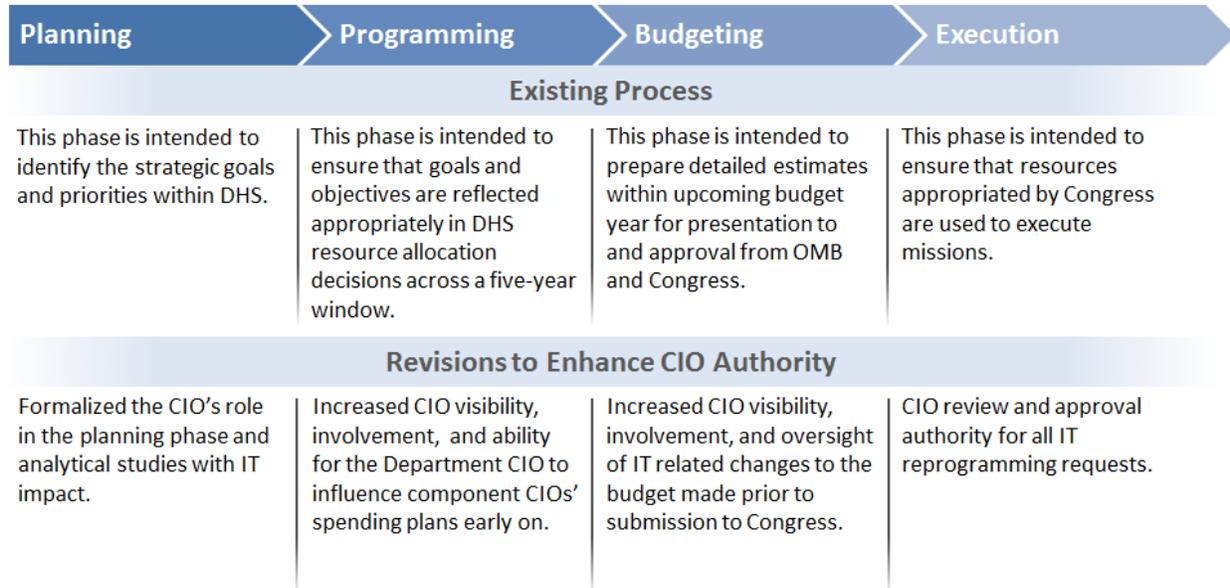
FITARA implementation has resulted in updates to various processes and policies. Such updates are intended to enhance CIO authority in the Common Baseline areas of IT budget formulation, budget execution, acquisition, and organization and workforce. As of the end of our audit fieldwork, these policies remained largely conceptual and had not yet been put in practice.

First, from late 2015 to early 2016, OCIO personnel reviewed and revised their existing budget process in collaboration with the Office of the Chief Financial Officer. The budget process, known as the Department's Planning, Programming, Budgeting, and Execution process, shown in figure 3, was reviewed in detail to realign the CIO's roles and responsibilities to meet FITARA requirements throughout each of the four phases of the budget cycle.



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Department of Homeland Security

Figure 3. Revisions to DHS’ Planning, Programming, Budgeting, and Execution Process



Source: OIG-generated based on DHS data

The programming phase, for example, was refined to enable the CIO to influence component IT budgets early in the process. The revised programming phase requires component CIOs to develop their IT spending plans, also called Resource Allocation Plans, in collaboration with the Department CIO.¹⁷ Previously, there was minimal collaboration between the DHS OCIO and component OCIOs in developing these requests for IT resources. OCIO anticipates that once the Department CIO and component CIOs carry out this updated process in upcoming budget cycles, it will provide greater assurance that component IT budget plans are aligned with departmental IT goals and objectives.

In March 2016, OCIO personnel also reported restructuring steps in the Budget Execution phase to increase the DHS CIO’s visibility of IT reprogramming requests.¹⁸ Specifically, the updated process provides the CIO with greater review and approval authority over component IT-related reprogramming submissions. Prior to this change, components could make reprogramming requests without the DHS CIO’s oversight. OCIO expects this

¹⁷ Components develop their Resource Allocation Plan based on the strategic guidance derived from the planning phase of the Planning, Programming, Budgeting, and Execution process. Resource Allocation Plans, developed during programming, serve as the basis for how components propose to fund their operations in coming years.

¹⁸ Reprogramming allows components to transfer funds among appropriations during budget execution.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

process change will help ensure CIO influence regarding any adjustments to IT spending plans that could have potential impact on the Department's IT environment.

The Department revised two key budget policies in March 2016 to reflect these enhancements to the CIO's budget authority. Specifically, OCIO and the Office of the Chief Financial Officer updated Directive 102-02, *Capital Planning and Investment Control*, signed on March 23, 2016. They also updated Directive 101-01, *Planning, Programming, Budget, and Execution*, which was pending signature by the Under Secretary for Management as of May, 2016. These policies are expected to improve the DHS CIO's oversight of IT budget requests once they become day-to-day practice.

Second, to meet FITARA's IT acquisition requirements, the Department expanded the CIO's role in the IT acquisitions review process. Specifically, in 2015 OCIO personnel worked with the Office of the Chief Procurement Officer to update the Department's existing acquisition plan review and approval process to include CIO certification of major IT program acquisition plans.¹⁹ This certification was intended to provide the DHS CIO with an opportunity to influence major programs early in the acquisition life cycle. The CIO had begun certifying acquisition plans for major programs as of May 2016. OCIO personnel were working to formally integrate this certification step into their IT Acquisition Review process by October 2016. OCIO anticipates that, once fully implemented, this revised process will increase the CIO's ability to steer IT investments toward the use of DHS shared services, IT already existing in other components, strategic sourcing, and other approaches to both reduce costs and improve the end product.

OCIO personnel worked with personnel from the Office of the Chief Procurement Officer during 2016 to revise three key policies to reflect these enhancements to the CIO's acquisition authority: DHS Instruction 102-01-001, *Acquisition Management Instruction*; the *Homeland Security Acquisition Manual*; and the *Acquisition Planning Guide*. The policy updates, completed in March 2016, are expected to improve the DHS CIO oversight, upon integration into routine IT acquisition practice.

Third, to meet FITARA's organization and workforce requirements, OCIO reviewed the existing performance framework to ensure the DHS CIO has sufficient input into component CIOs' annual performance evaluations. OCIO personnel worked with the Office of the Chief Human Capital Officer during

¹⁹ An acquisition plan is a key tool for managing major acquisitions by providing comprehensive documentation of the end-to-end acquisition approach.



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Department of Homeland Security

2015 on how best to revise performance plans for component CIOs to reflect this change. The updated CIO evaluation criteria were included in the March 2016 performance plan guidance to component heads for execution.

Measurable Outcomes of FITARA Enhancements not yet Evident

Despite these process and policy revisions to meet FITARA requirements, they largely remained improvements on paper with few measurable outcomes as of the May 2016 end of our fieldwork. EBMO and Chief Executive Office personnel agreed it was too early in the FITARA implementation process to assess its impact. Until FITARA improvements are fully institutionalized with performance measures in place to ensure their effectiveness, the Department will continue to be hampered by the IT budget and acquisition challenges we have reported on since DHS' inception in 2003.

For example, only upon complete implementation will the FITARA enhancements address ongoing deficiencies in the CIO's IT budget authority. Specifically, we reported in 2012 that the Department's current IT budget process did not provide the DHS CIO opportunity to effectively influence components' IT budgets.²⁰ Although the DHS CIO conducted a review of all components' IT budgets as part of the existing budget formulation process, the review took place after components had completed planning activities for specific IT initiatives. The review was not effective in changing component IT spending plan submissions. As a result, components could obtain funding for IT investments, regardless of the DHS CIO's input during the budget review process.

Additionally, only upon complete implementation will the FITARA enhancements provide the Department CIO with greater authority and visibility needed to address longstanding IT acquisition oversight deficiencies. For example, in 2004, we reported that the DHS CIO did not have sufficient visibility or approval authority for department-wide IT investments.²¹ We later reported in 2008 and 2012 that the DHS CIO had taken steps to improve IT acquisition authority.²² This included establishing an IT Acquisition Review process in 2006 to provide CIO oversight of all IT acquisitions and procurements more than \$2.5 million. However, the DHS CIO's acquisition

²⁰ *DHS Information Technology Management Has Improved, But Challenges Remain*, OIG-12-82, May 2012

²¹ *Improvements Needed to DHS' Information Technology Management Structure*, OIG-04-30, July 2004

²² *Progress Made in Strengthening DHS Information Technology Management, But Challenges Remain*, OIG-08-91, September 2008; and *DHS Information Technology Management Has Improved, But Challenges Remain*, OIG-12-82, May 2012



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Department of Homeland Security

review takes place after acquisition planning activities are completed. Consequently, a program office may proceed without CIO consultation until just prior to actual IT procurement.

As part of our audit, we asked the DHS CIO to opine on whether FITARA provided the necessary authority, visibility, and oversight to manage the Department's IT effectively. The CIO provided the following formal statement:

I think we've made great strides towards getting to an improved level of authority, visibility and oversight. We were doing a lot of the things that FITARA calls for and now we've got it documented and codified. I'm confident that once we go through a complete budget cycle we'll demonstrate that the processes are institutionalized, so that these processes can and will continue. I'm now reviewing and approving acquisition plans and reprogramming requests and those are just two examples of authority, visibility, and oversight that I didn't have before.

Performance Measurements Are Needed

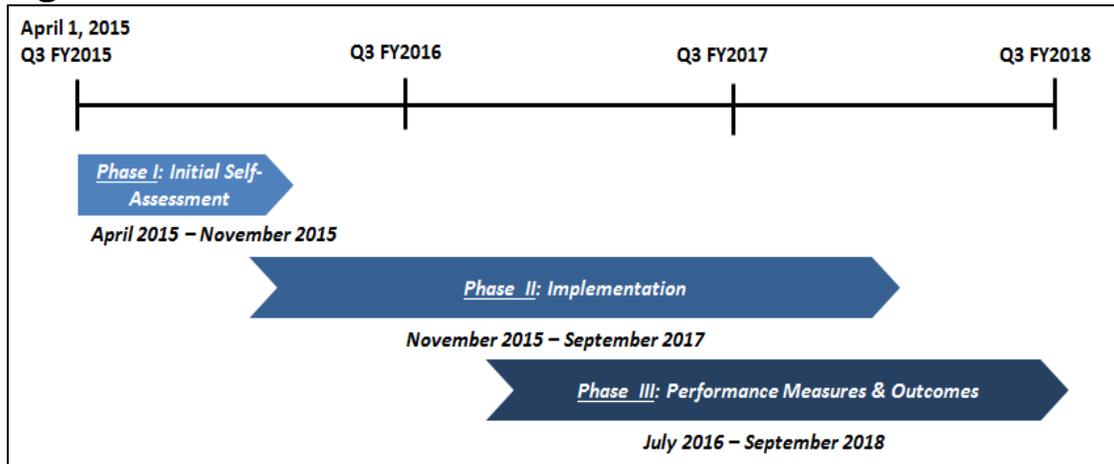
A final step in ensuring effectiveness is defining the performance measures needed to gauge the impact of FITARA enhancements on department-wide management of IT. Establishing metrics associated with FITARA's key goals, such as greater visibility into IT spending and reduced duplication of investments, would provide assurance of the long-term success of these efforts.

DHS has recognized the need for establishing measures to substantiate the impact of FITARA. For example, OCIO briefings to senior leadership identified the need for measures early on in FITARA implementation planning. As such, OCIO personnel outlined a third phase to their FITARA implementation approach that is focused solely on the development of measures to assess performance and outcomes, as shown in figure 4.



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Department of Homeland Security

Figure 4. Plan for Performance Measures and Outcomes



Source: DHS OCIO

At the time of our audit, OCIO personnel planned to initiate Phase III in July 2016. This phase entailed assessing the success of FITARA implementation, determining the need for readjustments to new processes, measuring the impact of FITARA, and defining a performance scorecard. The performance scorecard was envisioned as a way to measure the adoption of FITARA at the component level going forward. Until these steps are completed, however, the Department will be unable to identify the potential effects of FITARA or to focus on further improvements to IT management. Many of FITARA's intended benefits, such as process integration and improved collaboration, are multifaceted in nature and may never be easy to quantify.

Recommendations

We recommend that the CIO:

Recommendation 1: Complete all remaining implementation action items to ensure full implementation of the CIO responsibilities defined in FITARA.

Recommendation 2: Develop and implement metrics to measure the performance and impact of FITARA enhancements for fostering improved management and oversight of IT across the Department.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

OIG Analysis of Agency Comments

We obtained written comments on a draft of this report from the DHS CIO. We have included a copy of the comments in their entirety in appendix B.

In the comments, the DHS CIO concurred with our recommendations and provided details on the current actions OCIO is taking to address specific findings and recommendations in the report. We have reviewed the DHS CIO's comments and provided an evaluation here.

In response to recommendation 1, the DHS CIO concurred and provided an update on additional progress made since May 2016 to implement the CIO responsibilities defined in FITARA. Specifically, OCIO completed three additional Common Baseline elements to further enhance the CIO's authority in the areas of IT Budget Execution and IT Acquisition. We recognize the Department's actions as progress toward addressing this recommendation and look forward to future updates on completion of the remaining action items. This recommendation is open and resolved.

Responding to recommendation 2, the DHS CIO concurred and indicated that OCIO has outlined a third phase to develop measures and assess performance and outcomes as part of its FITARA implementation approach. In addition, the DHS CIO provided details on OCIO participation in a Federal government-wide working group to identify FITARA performance metrics, as well as efforts to measure FITARA implementation within the Department's components. We look forward to learning more about continued progress on these initiatives. This recommendation is open and resolved.



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

IT Investment Review and Reporting Functions Need Additional Improvement

The Department needs to take additional steps to improve certain IT investment transparency, risk management, and review and reporting processes in line with FITARA requirements. The CIO office has implemented several key enhancements, such as updating the agency-wide IT portfolio review process and reporting on cost savings and cost avoidance achieved as a result of new strategies adopted. However, other requirements such as reporting on the use of incremental development and conducting program reviews on high-risk investments were not fully met. These shortfalls were due, in part, to incomplete departmental processes to ensure compliance. Until these requirements are fully implemented, DHS will be challenged to ensure accurate reporting on adoption of incremental development and timely reviews of its high-risk IT investments.

Several IT Review and Reporting Requirements Implemented

OCIO has implemented several major FITARA review and reporting requirements necessary for IT investment oversight. For example, OCIO updated its agency-wide IT portfolio review process, called PortfolioStat, to ensure alignment with FITARA guidance. FITARA requires agencies to hold PortfolioStat sessions on a quarterly basis with OMB, the agency CIO, and other attendees, whereas these oversight sessions were previously required annually.²³ Agencies also must report the status of PortfolioStat action items to OMB on a quarterly basis for IT monitoring across the Federal Government. From our audit, we determined that OCIO was conducting quarterly PortfolioStat sessions and reporting the status of action items, as required.

OCIO also reports its cost savings to OMB, as FITARA requires. Agencies must provide OMB with information on cost savings and cost avoidance achieved as a result of efficiency strategies the agency has implemented. Our audit confirmed that DHS provided this information to OMB and, in return, received a summary scorecard of performance data from OMB.

²³ OMB, Memorandum for Heads of Executive Departments and Agencies: *Implementing PortfolioStat*, M-12-10 (Washington, DC, March 30, 2012); OMB, Memorandum for the Heads of Executive Departments and Agencies: *Fiscal Year 2013 PortfolioStat Guidance: Strengthening Federal IT Portfolio Management*, M-13-09 (Washington, DC, March 27, 2013). OMB, Memorandum for the Heads of Executive Departments and Agencies: *Fiscal Year 2014 PortfolioStat*, M-14-08 (Washington, DC, May 7, 2014).



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Other IT Review and Reporting Requirements Need Improvement

At the same time, however, OCIO did not meet other key FITARA reporting requirements. For example, the Department did not accurately report on CIO certification of incremental development. Incremental development is a software development methodology that delivers and tests capabilities in smaller increments over shorter periods of time in close collaboration with the customer. FITARA requires the CIO to certify that the agency's IT investments are adequately implementing incremental development (i.e., the delivery of new or modified technical functionality to users occurs at least every 6 months), as defined in capital planning guidance issued by OMB.²⁴

OCIO had developed a process to certify that DHS IT investments were delivering technical functionality to users at least every 6 months. However, we found that the Department did not update each major IT investment business case to accurately reflect the CIO's determination on whether incremental development was adequately used, as required. In May 2016, we compared OCIO's list of IT investments using incremental development with information reported in the business cases for 92 DHS major investments and found instances where the information did not match. For instance, some IT investments that the CIO considered incremental development did not include that certification in their business cases. Conversely, we identified business cases for IT investments incorrectly claiming certification that were not on the CIO's list of incremental investments.

Also, by the end of our audit fieldwork, OCIO had not implemented an Automatic TechStat requirement in accordance with the guidance OMB issued in June 2015 regarding FITARA implementation.²⁵ A TechStat is a face-to-face, evidence-based accountability review of an IT program with agency leadership. TechStat sessions are a tool for getting ahead of critical problems in an investment, turning around underperforming investments, or terminating investments as appropriate. OMB requires a department or agency to hold an Automatic TechStat session if an investment has a high-risk rating on the IT Dashboard for three consecutive months since July 1, 2015.

In March 2016, we identified seven DHS IT investments that were rated "Moderately High Risk" between July and September 2015 and, therefore, should have had Automatic TechStat sessions performed by the end of the following month. As of May 2016, DHS had not performed Automatic TechStat sessions on the seven investments we identified.

²⁴ FITARA Section 831.B.ii, *Fiscal Year 2017 IT Budget - Capital Planning Guidance*

²⁵ OMB M-15-14, *Management and Oversight of Federal Information Technology*, June 10, 2015



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Refinements to Processes Are Needed

Deficiencies in meeting certain FITARA review requirements were due, in part, to a lack of adequate processes. For example, the process for certifying incremental development did not include a mechanism to ensure that CIO certification results were accurately reported in each investment's business cases. OCIO personnel acknowledged this problem and indicated they planned to enhance their process to address this deficiency.

The Department also had not finalized its policy to ensure that Automatic TechStat sessions are carried out as required. Specifically, the Department incorporated the Automatic TechStat requirement into draft guidance dated October 2015, but this guidance had not yet been approved by May 2016, the end of our audit fieldwork. EBMO personnel also said that Automatic TechStat sessions had not been conducted for some investments that were either delayed by bid protests or had outdated acquisition documentation. For other cases, EBMO personnel said TechStat sessions had recently occurred, or the investments were part of an ongoing IT acquisition transformation pilot. The Department would benefit from finalizing its policy to ensure that TechStat sessions are more timely held in the future.

Oversight of IT Investments and Accurate Reporting Are Hindered

Until DHS fully implements these reporting and review requirements, the CIO will be challenged to ensure accurate reporting on adoption of incremental development or timely reviews of high-risk investments. To illustrate, Automatic TechStat sessions are to provide value by focusing management attention on troubled projects and establishing clear corrective actions for turning the projects around or terminating them. Without these reports and reviews to support them, DHS may not identify or address program risks in a timely manner.

Recommendation

We recommend that the CIO:

Recommendation 3: Update existing departmental policies and procedures to promote compliance with FITARA transparency and risk management reporting and review requirements.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

OIG Analysis of Agency Comments

In response to recommendation 3, the DHS CIO concurred and indicated that OCIO will update and improve policies and procedures to promote compliance with FITARA transparency, risk management, portfolio review, and reporting requirements. Further, the DHS CIO indicated that OCIO would provide information to the IT Dashboard, as required by OMB guidance. We look forward to updates on the specific actions OCIO is taking to implement accurate reporting on the use of incremental development, as well as ensure that required program reviews of high-risk investments are conducted. This recommendation is open and resolved.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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*. As part of our ongoing responsibilities to assess the efficiency, effectiveness, and economy of the departmental programs and operations, we conducted an audit to determine the extent to which DHS has implemented FITARA to improve department-wide IT management and oversight.

We researched and reviewed Federal laws and guidance, and Department management directives, instructions, and other written procedures. We obtained documents, testimony, and news articles related to requirements and implementation of FITARA. Additionally, we reviewed recent Government Accountability Office and DHS OIG reports to identify prior findings and recommendations. We used this information to establish a data collection approach that consisted of focused information-gathering meetings and documentation analysis.

We held interviews and participated in teleconferences with DHS staff at headquarters offices to learn about the Department's progress in FITARA implementation. We met with the DHS CIO, the Principal Deputy CIO, the Executive Director of EBMO, and other OCIO officials, to discuss their roles and responsibilities as related to FITARA and the planned implementation process. We obtained DHS' report to OMB on its progress in implementing FITARA. Because implementation was in an early phase and continuously changing, we did not take steps to verify the information at that time, but will conduct a follow-up verification audit at a later date.

We met with senior agency officials including the Chief Procurement Officer, the Deputy Chief Financial Officer, the Office of the Chief Human Capital Officer, the Office of Program Accountability and Risk Management, the Joint Requirements Council, the Office of Policy, and the Chief Readiness Support Officer to obtain their perspectives on the Department's efforts and anticipated results related to FITARA.

We met with Integrated Planning Team representatives from seven major DHS components to discuss the coordination of FITARA implementation efforts between headquarters and component-level OCIOs. These components were U.S. Customs and Border Protection, the Federal Emergency Management Agency, U.S. Immigration and Customs Enforcement, the Transportation



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Security Administration, U.S. Citizenship and Immigration Services, the United States Coast Guard, and the United States Secret Service.

We appreciate the courtesies extended to us during the performance of this audit. Major OIG contributors to the audit are identified in appendix D.

We conducted this performance audit between February and May 2016 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



OFFICE OF INSPECTOR GENERAL
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Appendix B
DHS Comments to the Draft Report

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



**Homeland
Security**

September 16, 2016

MEMORANDUM FOR: Sondra F. McCauley
Assistant Inspector General
Office of Information Technology Audits

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

SUBJECT: Management's Response to OIG Draft Report: "DHS' Progress in
Implementing the Federal Information Technology Acquisition
Reform Act" (Project No. 16-021-ITA-MGMT)

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) 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 of our significant progress implementing the Federal Information Technology Acquisition Reform Act (FITARA) to improve department-wide Information Technology (IT) management and oversight. It is also important to note that since the conclusion of OIG's field work in June 2016, DHS has achieved several additional milestones. Specifically, we have increased the number of completed FITARA elements of the Office of Management and Budget (OMB) Common Baseline Guidance from 11 out of 17 to 14 out of 17, including one in IT Budget Execution and two in IT Acquisition. In addition, we completed 12 additional action items, increasing the proportion of action items completed to 121 out of 131 (92 percent) from 109 of 131 (83 percent). Only ten action items need to be achieved to attain full compliance with the OMB common baseline requirement. DHS remains committed to doing its part to fully implement the first major overhaul of Federal IT in almost 20 years.

The draft report contained three recommendations with which the Department concurs. Attached find our detailed response to each recommendation.

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

Attachment



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Department of Homeland Security

**Attachment: DHS Management Response to Recommendations
Contained in OIG Draft Report No. 16-021-ITA-MGMT**

OIG recommended that the Chief Information Officer (CIO):

Recommendation 1: Complete all remaining implementation action items to ensure full implementation of the CIO responsibilities defined in FITARA.

Response: Concur. The DHS Office of the Chief Information Office's (OCIO) Enterprise Business Management Office (EBMO) has already completed 14 of 17 implementation action items. The remaining partially addressed items related to budget execution, acquisition, organization, and workforce will be completed no later than September 30, 2016; December 31, 2016; and March 31, 2018, respectively. Overall Estimated Completion Date (ECD): March 31, 2018.

Recommendation 2: Develop and implement metrics to measure the performance and impact of FITARA enhancements for fostering improved management and oversight of IT across the Department.

Response: Concur. As noted in the draft report, DHS has recognized the need for establishing performance measures to demonstrate the impact of FITARA. As such, DHS OCIO's EMBO has outlined a third phase to the FITARA implementation approach that is focused solely on the development of measures to assess performance and outcomes. We are currently participating in a Federal-wide working group to identify FITARA performance metrics. In addition to measuring the impact of FITARA, the Department is developing a FITARA Implementation Maturity Model to measure the implementation of the various processes within the components. ECD: September 30, 2017.

Recommendation 3: Update existing departmental policies and procedures to promote compliance with FITARA transparency and risk management reporting and review requirements.

Response: Concur. DHS recognizes the importance of continuing to update existing departmental policies and procedures to promote compliance with FITARA transparency and risk management reporting and review requirements. As indicated in the DHS FITARA Common Baseline Plan, EBMO will continue to analyze update and improve our policies and procedures to promote compliance FITARA transparency, risk management, portfolio review, and reporting. EMBO will also continue to provide information to the Federal IT Dashboard, as required by OMB's capital planning and investment control (CPIC) guidance, which is issued annually in conjunction with the release of OMB Circular A-11 and through PortfolioStat. ECD: September 30, 2017.



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Department of Homeland Security

Appendix C
DHS' Common Baseline Implementation Status

Category	Element	Initial Status (August 2015)	Current Status (April 2016)
Budget Formulation	A. Visibility of IT resources	Implemented	Implemented
	B. CIO role in pre-budget submission	Partially Implemented	Implemented
	C. CIO role in planning program management	Partially Implemented	Implemented
	D. CIO role in budget request	Partially Implemented	Implemented
Budget Execution	E. Ongoing CIO engagement with program managers	Partially Implemented	Implemented
	F. Visibility of IT planned expenditure reporting to CIO	Partially Implemented	Partially Implemented
	G. CIO defines IT processes and policies	Partially Implemented	Implemented
	H. CIO role on program governance boards	Partially Implemented	Partially Implemented
	J. CIO role in recommending modification, termination, or pause of IT	Partially Implemented	Partially Implemented
	L. CIO approval of reprogramming	Partially Implemented	Implemented
Acquisition	I. Shared acquisition and procurement responsibilities	Partially Implemented	Partially Implemented
	K. CIO review and approval of acquisitions	Partially Implemented	Partially Implemented
Organization and Workforce	M. CIO approves new bureau CIOs	Implemented	Implemented
	N. CIO role in ongoing bureau CIOs' evaluations	Partially Implemented	Implemented
	O. Bureau IT Leadership Directory	Partially Implemented	Implemented
	P. IT Workforce	Partially Implemented	Partially Implemented
	Q. CIO reports to agency head (or deputy/Chief Operating Officer)	Implemented	Implemented

Source: OIG-generated from DHS' 2016 FITARA Self-Assessment



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Appendix D
Office of IT Audits Major Contributors to This Report

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Appendix E
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