

DHS Has Limited Capabilities to Counter Illicit Unmanned Aircraft Systems





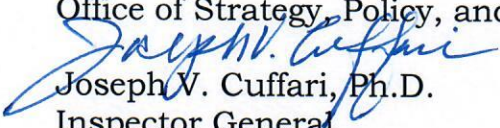
OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

June 25, 2020

MEMORANDUM FOR: James W. McCament
Senior Official Performing the
Duties of Under Secretary
Office of Strategy, Policy, and Plans

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

SUBJECT: *DHS Has Limited Capabilities to Counter
Illicit Unmanned Aircraft Systems*

Attached for your action is our final report, *DHS Has Limited Capabilities to Counter Illicit Unmanned Aircraft Systems*. We incorporated the formal comments provided by your office.

The report contains four recommendations aimed at improving DHS' management and implementation of its counter-unmanned aircraft systems activities. Your office concurred with all four recommendations. Based on information in your response to the draft report, we consider recommendation 1 closed and resolved and recommendations 2 through 4 open and resolved. 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 email a signed PDF copy of your comments to OIGAuditsFollowup@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 final report on our website, including your formal comments as an appendix to the report.

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

Attachment



DHS OIG HIGHLIGHTS

DHS Has Limited Capabilities to Counter Illicit Unmanned Aircraft Systems

June 25, 2020

Why We Did This Audit

Unmanned Aircraft Systems (UAS), commonly referred to as ‘drones,’ present an emerging threat to the Nation as their popularity grows. Terrorists, criminal organizations, and lone actors have used UAS for malicious purposes. The Department of Homeland Security is tasked with protecting and securing the homeland from these evolving threats. We conducted this audit to determine to what extent DHS counters illicit use of UAS while protecting the homeland.

What We Recommend

We made four recommendations to improve the Department’s management and implementation of counter-unmanned aircraft systems (C-UAS) activities.

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

DHS’ capability to counter illicit UAS activity remains limited. On November 8, 2018, the former DHS Secretary issued an internal memorandum calling for a uniform approach to DHS’ expansion of its C-UAS capability under the *Preventing Emerging Threats Act*. The Secretary assigned the Office of Strategy, Policy, and Plans (Office of Policy) as the Department’s lead over components with authorized C-UAS missions (United States Secret Service, United States Coast Guard, Customs and Border Protection, and Federal Protective Service). The Secretary instructed these components to not take any actions toward C-UAS expansion until the Office of Policy completed a uniform approach for doing so.

However, the Office of Policy did not execute a uniform approach as directed because it did not request the funding needed to obtain subject matter experts to fulfill all of the Secretary’s requirements for the uniform approach, including developing a realistic work plan and issuing complete department-wide C-UAS guidance. According to DHS officials, funding for C-UAS expansion unsuccessfully competed with other mission priorities for budget resources. Consequently, DHS will remain vulnerable to increased security risks and emerging threats from unmanned aircraft until it expands its capability to counter illicit UAS activity.

Agency Response

DHS concurred with all four recommendations and initiated corrective actions to address the findings.



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Background

Unmanned Aircraft Systems (UAS), commonly referred to as ‘drones,’ present an emerging threat to the Nation as their popularity grows. The *FAA Modernization and Reform Act of 2012* defines a UAS as an unmanned aircraft and its associated elements. These elements include the pilot in command and the aircraft that operate in the national airspace system. The Federal Aviation Administration (FAA) projects the recreational UAS fleet to grow from 1.2 million units in 2018 to 1.4 million in 2023, an average annual growth rate of 2.2 percent. Additionally, the commercial UAS fleet is forecasted to nearly triple from 277,386 in 2018 to 835,211 in 2023, an average annual growth rate of 24.7 percent. Further with more than 900,000 UAS owners registered as of December 31, 2018, the FAA estimated there were about 1.25 million model drones in circulation. As described, the legitimate use of UAS is on the rise. The increased availability of drones on the open market continues to amplify security risks and emerging threats for the foreseeable future. Table 1 provides a brief identification and explanation of UAS-related threats facing the Department of Homeland Security.

Table 1: DHS’ UAS-Related Threats and Definitions

UAS Threat	Definition/Explanation
Weaponized or Smuggling Payloads	UAS are capable of transporting contraband, chemical, or other explosive/weaponized payloads.
Prohibited Surveillance and Reconnaissance	UAS are capable of silently monitoring a large area from the sky for nefarious purposes.
Intellectual Property Theft	UAS are capable of performing cybercrimes involving theft of sensitive information.
Intentional Disruption or Harassment	UAS are capable of disrupting and invading the privacy of individuals.

Source: DHS Cybersecurity and Infrastructure Security Agency

In a September 5, 2018 press release, “Rethinking Homeland Security in an Age of Disruption”, the DHS Secretary remarked, “Terrorists are using drones on the battlefield to surveil and to destroy. Drug smugglers are using them to monitor border patrol officers so they can slip into America undetected. And criminals are using them to spy on sensitive facilities. Drones can also be used to disrupt communications and or to steal data on nearby Wi-Fi.” In January 2015, a drone crashed onto the lawn of the White House illustrating a drone’s ability to evade detection and create challenges for secure facilities. Figure 1



Figure 1: Drone that Crashed onto the White House Lawn
Source: Office of Inspector General (OIG) obtained from internet



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shows the drone recovered from the White House lawn by the United States Secret Service (Secret Service). Further, in August 2017, drug smugglers used a drone to smuggle 13 pounds of methamphetamine across the Southwest Border of the United States. Figure 2 shows the drone and methamphetamine recovered by U.S. Customs and Border Protection (CBP).



Figure 2: A Drone Smuggling Methamphetamine across the Southwest Border
Source: OIG obtained from internet

These are just two examples of the illicit UAS activity DHS faces as it seeks to expand its Counter Unmanned Aircraft Systems (C-UAS) capability.¹

DHS Authorities

On October 5, 2018, the President signed into law the *Preventing Emerging Threats Act of 2018* (the Act), the first statutory grant of authority for DHS to explicitly counter UAS threats. Prior to passage of the Act, only the Secret Service and the United States Coast Guard (Coast Guard) had express authority to counter illicit UAS activity. These components' capabilities were limited because C-UAS authority was either restricted to each component's specific mission or under the auspices of another department.

Secret Service

According to Secret Service officials, the Secret Service started its C-UAS development in 2012 prior to passage of the Act, to support requirements of its protective mission pursuant to 18 United States Code (U.S.C.) 3056, *Powers*,

¹ We define C-UAS capability as being able to perform all five authorized actions (detection, identification, monitoring, tracking, and mitigation), and limited C-UAS capability as being able to perform at least one, but not all, authorized actions.



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Authorities, and Duties of United States Secret Service and pursuant to Executive Order 12333.

Coast Guard

In June 2017, the Deputy Commandant for Operations directed the Coast Guard to pursue C-UAS authorized actions under Department of Defense (DOD) authority to support its maritime escort mission. Therefore, the Coast Guard’s C-UAS capability was restricted to operating during DOD maritime escort missions. In this capacity, the Coast Guard operates under Title 10 U.S.C. Section 130i - *Protection of Certain Facilities and Assets from Unmanned Aircraft*, whereby certain DOD assets require Coast Guard escorts when operating in and out of their homeports.

CBP and Federal Protective Service

Passage of the Act expanded DHS legacy component authorities by granting CBP and the Federal Protective Service (FPS) authority to obtain and operate C-UAS mitigation capabilities. For example, CBP did not have the express authority to mitigate a UAS threat before the passage of the Act. However, it was able to passively detect UAS activities using its existing border surveillance capabilities. Further, FPS had neither the authority nor the capability to mitigate a UAS threat before passage of the Act empowered it to do so. At the time of our audit, FPS was not actively pursuing a C-UAS capability.

Table 2 identifies DHS component authorities to counter illicit UAS prior to and following the passage of the Act.

Table 2: DHS C-UAS Authorities Prior to and Following the Act

	Secret Service	Coast Guard	CBP	FPS
Prior to Act	Yes	Yes	No	No
Post Act	Yes	Yes	Yes	Yes

Source: DHS OIG analysis of authorities before and after the Act

In general, the Act permits authorized DHS component personnel to:

- detect, identify, monitor, and track UAS without prior consent;
- warn the operator of a UAS, including by electromagnetic means;
- disrupt control, seize control, or confiscate a UAS without prior consent; and
- use reasonable force to disable, damage, or destroy a UAS.



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C-UAS Capability

Authorized component personnel may operate C-UAS capabilities to eliminate credible threats² posed by a UAS. These capabilities include systems or devices capable of performing five authorized actions to secure and protect covered facilities or assets:³ detect, identify, monitor, track, and mitigate. C-UAS capabilities may require a layered approach that integrates the following actions necessary to mitigate a potential threat.

- Detect – Discovering a UAS by visual or electronic means.
- Identify – Distinguishing UAS threats from lawful activity.
- Monitor – Continuous observation of a UAS to determine intent.
- Track – Observation of a UAS to determine its path.
- Mitigate – Acting to deter, prevent, or minimize the consequences of safety and security threats posed by certain UAS. DHS may use both nonkinetic force, such as electronic means, and reasonable physical force to mitigate UAS threats.

We conducted this audit to determine to what extent DHS counters illicit use of UAS while protecting the homeland.

Results of Audit

DHS' C-UAS Capabilities Remain Limited

The Department's capability to counter illicit UAS activity remains limited. DHS' components with authorized C-UAS missions (Secret Service, Coast Guard, CBP, and FPS) could not expand their C-UAS capabilities as permitted by the Act because the Office of Policy did not execute a uniform approach by which to do so, as the Secretary had directed. Specifically, the Office of Policy did not request the funding required to obtain subject matter experts to fulfill all of the Secretary's requirements of the uniform approach, including developing a realistic work plan and issuing complete department-wide C-UAS guidance. According to DHS officials, funding for C-UAS expansion unsuccessfully competed with other Department mission priorities for budget resources. Consequently, DHS will remain vulnerable to increased security risks and emerging threats from unmanned aircraft until it expands its capability to counter illicit UAS activity.

² Credible threat is the reasonable likelihood a UAS, if unabated, would disrupt DHS operations.

³ Covered facilities and assets are (i) located in the United States, (ii) directly related to certain DHS missions, and (iii) identified as high-risk and potential targets for unlawful UAS activity.



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DHS Did Not Expand Its C-UAS Capabilities

On November 8, 2018, the former DHS Secretary issued an internal memorandum, *Preparing for Implementation of the Preventing Emerging Threats Act of 2018*, outlining a uniform approach to expanding DHS’ C-UAS capability. The Secretary assigned DHS’ Office of Strategy, Policy, and Plans (Office of Policy) as the lead over Department components authorized to conduct C-UAS operations. Further, the Secretary instructed the components to not take any C-UAS implementation actions under the Act until Office of Policy had completed the uniform approach.

However, the Office of Policy did not proceed with executing the desired uniform approach, preventing components from expanding their capabilities as permitted by the Act. The Secret Service continued operating a C-UAS capability for its protective mission and the Coast Guard did not expand its capability beyond its DOD maritime escort mission. Additionally, CBP and FPS did not obtain C-UAS capabilities. Table 3 identifies DHS’ capability to counter illicit UAS prior to and following passage of the Act and issuance of the former Secretary’s memo.

Table 3: DHS C-UAS Capability Prior to and Following the Act

	Secret Service	Coast Guard	CBP	FPS
Pre Act / Memo	Yes – Protective Mission	Yes – DOD Maritime Escort Mission	No	No
Post Act / Memo	Yes – Protective Mission	Yes – DOD Maritime Escort Mission	No	No

Source: DHS OIG analysis of C-UAS capability before and after the passage of the Act

Office of Policy Remained Unfunded

The Office of Policy did not execute a uniform approach to expand DHS’ C-UAS capability because it did not request funding as directed by the Secretary. The Secretary’s memo directed the Office of Policy to work with the Office of the Chief Financial Officer (OCFO) to prepare a request for reprogramming⁴ of prior year funds. However, according to Office of Policy officials, they did not believe the OCFO would approve a reprogramming request for C-UAS implementation efforts because of numerous competing budgetary priorities. Therefore, the Office of Policy did not submit a formal reprogramming request to the OCFO as directed in the Secretary’s memorandum and did not obtain the funding it

⁴ Reprogramming is the moving of funds within an appropriation or from one budget activity to another.



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needed to support C-UAS expansion.

Lack of Subject Matter Experts

In its response to the *FY 2020 DHS Appropriations Bill Technical Assistance Request*, the Office of Policy identified a need for specific subject matter experts to guide its C-UAS expansion across six lines of effort:

1. policy development;
2. interagency coordination / driving implementation;
3. requirements, research, development, and testing and evaluation;
4. operations coordination;
5. external training, education and engagement; and
6. program management.

However, inadequate funding prevented the Office of Policy from obtaining the subject matter experts it needed to fulfill all of the Secretary's requirements for DHS' C-UAS expansion, including developing a work plan and issuing department-wide C-UAS guidance. As such, the Office of Policy relied on detailees who did not possess the technical expertise needed to facilitate DHS' C-UAS implementation. According to Office of Policy officials, their office did not possess the full complement of skills needed to drive progress and ensure department-wide coordination of C-UAS activities.

Unrealistic Work Plan

The Secretary's memorandum directed the Office of Policy to develop a C-UAS work plan describing implementation actions and including milestones to aid DHS' C-UAS efforts. The work plan the Office of Policy developed enabled DHS to complete some, but not all, required C-UAS expansion tasks, and not always on time. The plan was also unrealistic, resulting in DHS missing target dates for completing several tasks outlined in the Secretary's memorandum. For example, DHS issued C-UAS guidance in September 2019, significantly later than the target date of April 2019. Additionally, guidance for resource allocation plans for FY 2019 funding, the incident reporting process, and covered facility prioritization remain incomplete. DHS officials from three offices confirmed the work plan was outdated and no longer relevant. Table 4 shows selected implementation actions with estimated and actual completion dates.



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Table 4: Selected Work Plan Target Dates versus Actual Completion Dates

Task Name	Target Date	Actual Date
Establish Executive Steering Committee and Working Groups	November 2018	November 2018
Provide Guidance for Resource Allocation Plans for FY19 Funding	December 2018	Incomplete
Develop Incident Reporting Process	January 2019	Incomplete
Covered Facility or Asset Identification and Prioritization Process	December 2018	Incomplete
Departmental Guidance*	April 2019	September 2019

Source: DHS OIG analysis of Office of Policy C-UAS work plan

* Although Department policy guidance was issued, we determined it was incomplete, as we identify later in the report.

C-UAS Guidance Is Incomplete

The Secretary’s memorandum required the Office of Policy to develop and issue C-UAS guidance for DHS prior to any implementation efforts. The Office of Policy issued the *Secretary’s Counter-Unmanned Aircraft Systems Policy Guidance* on September 10, 2019, but the guidance was incomplete. Although the guidance referred to six annexes specifying processes and procedures DHS components authorized to conduct C-UAS operations should follow to ensure program uniformity and consistency, the annexes were missing from the document. The six annexes were to describe the key processes and procedures related to covered facilities, coordination, privacy, external support, reporting, and key definitions. As of the final report issuance, DHS officials confirmed the Office of Policy had not completed the six annexes.

Conclusion

Until DHS funds the C-UAS initiative, and authorized components expand their capability to counter illicit UAS activity, the homeland will remain vulnerable to increased security risks and emerging threats for the foreseeable future. Without subject matter experts, a realistic work plan, and fully developed C-UAS guidance, DHS’ ability to coordinate component C-UAS efforts will continue to be hindered. Further, without proper coordination across components and a uniform approach to expansion, C-UAS capabilities could be significantly delayed or altogether ineffective. Specifically:

- C-UAS policies may be fragmented and vary from component to component, potentially leading to inconsistent applications of C-UAS capabilities and authorities.



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- Components may develop and use different standards to assess and propose assets and locations for C-UAS protection.
- Some components may acquire and deploy less capable systems than other components, hindering DHS' overall ability to counter the UAS threat.

Recommendations

Recommendation 1: We recommend the Under Secretary for Strategy, Policy, and Plans identify its budget requirements and convey those requirements to the Office of the Chief Financial Officer for consideration as identified in the Secretary of Homeland Security's memorandum dated November 8, 2018.

Recommendation 2: We recommend the Under Secretary for Strategy, Policy, and Plans conduct an objective workforce analysis of the C-UAS Program Management Office to determine the appropriate staff needed to accomplish the office's mission cost-effectively.

Recommendation 3: We recommend the Under Secretary for Strategy, Policy, and Plans develop a timeline with achievable goals for C-UAS capability implementation across the Department.

Recommendation 4: We recommend the Under Secretary for Strategy, Policy, and Plans complete the Secretary's *Counter Unmanned Aircraft Systems Policy Guidance*, including the annexes specifying processes and procedures the Department needs to conduct C-UAS operations and ensure program uniformity and consistency.

Management Comments and OIG Analysis

The Office of Policy concurred with our four recommendations and is taking steps, or has implemented actions to address them. Although the Office of Policy did not concur with our overall report conclusion, we still contend that it did not execute a uniform approach to address the Secretary's November 8, 2018 memorandum, *Preparing for Implementation of the Preventing Emerging Threats Act of 2018*. The Office of Policy cites that the approach it developed and implemented to include establishment of the C-UAS Program Management Office (PMO) facilitated meaningful progress in its efforts to address the Secretary's requirements. We likewise acknowledge the establishment of the C-UAS PMO and other initiatives it undertook as important steps toward meeting the Secretary's mandate. However, the C-UAS PMO did not fully carry out the steps outlined in the Secretary's memo, which prevented implementation of a uniform approach and deployment of a



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department-wide C-UAS capability. Consequently, the Department's C-UAS capability was not expanded beyond the capabilities that the Secret Service and Coast Guard already possessed.

The Office of Policy also questioned, "The value added in recommending actions the audit team was told were already being taken" to correct the deficiencies we identified. We recognize that the Office of Policy proactively implemented some actions towards resolving our recommendations. However, providing formal recommendations in our report holds the audited entity accountable to ensure these deficiencies ultimately are fully implemented. Although the Office of Policy satisfied one of the four recommendations we made in its entirety, this is only one step needed to achieve the Secretary's uniform department-wide C-UAS approach.

Appendix A contains the Office of Policy's management comments in their entirety. We also received technical comments to the draft report and revised the report where appropriate. A summary of the Office of Policy's responses and our analysis follow.

DHS Comments to Recommendation 1: Concur. The Office of Policy's PMO manages all C-UAS coordination across the Department and related interagency efforts. A fully functional PMO requires approximately \$5 million annually to support nine full-time equivalent staff and operating funds. The Office of Policy submitted this requirement to the OCFO on April 5, 2020, as part of the formal Fiscal Years 2022–2026 Resource Allocation Planning process.

OIG Analysis of DHS Comments: The Office of Policy has taken steps to satisfy the intent of this recommendation. We obtained and analyzed the Resource Allocation Plan Program Decision Option for FYs 2022–2026 and determined that the Office of Policy identified and conveyed necessary budget requirements to the OCFO. If the Office of Policy receives the full budget as requested, it should be able to complete many of the requirements to implement a C-UAS capability throughout the Department. We consider this recommendation resolved and closed.

DHS Comments to Recommendation 2: Concur. In addition to the \$5 million budget requirement submitted to DHS' OCFO on April 5, 2020, the Office of Policy will scope and execute a workforce analysis tailored to meet requirements for a future state C-UAS PMO. The Office of Policy will identify an appropriate funding source and the appropriate resource to perform the workforce analysis. The PMO will also collaborate with component partners to clearly delineate roles and responsibilities as well as prioritize its functions to better identify required subject matter expertise, as appropriate. Estimated Completion Date: April 30, 2021.



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OIG Analysis of DHS Comments: The Office of Policy has taken steps to satisfy the intent of this recommendation. We consider this recommendation resolved, but it will remain open until the Office of Policy provides documentation to support that all planned corrective actions are completed.

DHS Comments to Recommendation 3: Concur. Establishing the DHS C-UAS PMO within the Office of Policy's Office of Counterterrorism and Threat Prevention Policy enhances DHS' implementation and oversight capacity, and enables completion of tasks within established deadlines, along with improvements in interagency communications. The C-UAS PMO and components made significant progress completing activities identified in the current work plan. The PMO and components will work with partners to refresh the work plan by closing out completed milestones, prioritizing current activities, and establishing new milestones based on relevant projects. The C-UAS PMO will account for funding and staffing while developing milestones and deliverable due dates. Estimated Completion Date: April 30, 2021.

OIG Analysis of DHS Comments: The Office of Policy has taken steps to satisfy the intent of this recommendation. We consider this recommendation resolved, but it will remain open until the Office of Policy provides documentation to support that all planned corrective actions are completed.

DHS Comments to Recommendation 4: Concur. As of May 12, 2020, the Office of Policy had completed three of the six required annexes, and was coordinating the remaining three draft annexes through the Department-wide clearance processes, as appropriate. Estimated Completion Date: December 31, 2020.

OIG Analysis of DHS Comments: The Office of Policy has taken steps to satisfy the intent of this recommendation. We consider this recommendation resolved, but it will remain open until the Office of Policy provides documentation to support that all planned corrective actions are completed.

Objective, Scope, and Methodology

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

Our audit objective was to determine to what extent DHS counters illicit use of UAS while protecting the homeland. To accomplish our objective, we reviewed Federal laws and regulations related to countering unmanned aircraft systems and DHS' internal controls, policies, procedures, and guidance associated with UAS.



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We interviewed DHS personnel from the Office of Policy, Office of the General Counsel, Coast Guard, CBP, Cybersecurity and Infrastructure Security Agency, U.S. Immigration and Customs Enforcement, Secret Service, Transportation Security Administration, OCFO, Science and Technology Directorate, Office of Intelligence and Analysis, and FPS.

We reviewed Secret Service, CBP, Coast Guard, and FPS policy and guidance relevant to C-UAS. We analyzed components' UAS sighting data. This included sightings from Secret Service, Coast Guard, CBP, FPS, and the Transportation Security Administration. However, we are not relying on the data to support our findings or conclusions. Therefore, we did not perform data reliability testing.

We conducted this performance audit between February 2019 and October 2019 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 the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

Office of Audits major contributors to this report are Maryann Pereira, Director; Anthony Colache, Audit Manager; Mark Lonetto, Auditor-in-Charge; Ryan McCarthy, Auditor; Zachary Wilkolaski, Auditor; Tessa Clement, Independent Reference Reviewer; James Lazarus, Attorney Advisor; and Thomas Hamlin, Communications Analyst.



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Appendix A
Office of Policy Comments to the Draft Report


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



**Homeland
Security**

May 12, 2020

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

FROM: James W. McCament 
Senior Official Performing the Duties of Under Secretary
Office of Strategy, Policy, and Plans

SUBJECT: Management Response to Draft Report: "DHS Has Limited
Capabilities to Counter Illicit Unmanned Aircraft Systems"
(Project No. 19-004-AUD-DHS)

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

PLCY concurs with the OIG's recommendations inasmuch as one has already been completed and two are well in progress, but questions the value added in recommending actions the audit team was told were already being taken. We particularly appreciate the OIG's discussion of the cascading impacts of budgetary constraints. However, it is important to note that PLCY disagrees with the draft report's assertion that we did not execute a uniform approach to address the Secretary's November 8, 2018 memorandum, "Preparing for Implementation of the Preventing Emerging Threats Act of 2018," limiting the Department's progress to expand counter-unmanned aircraft systems (C-UAS) capabilities. To the contrary, we believe the approach developed and implemented by PLCY's C-UAS Program Management Office (PMO), in close collaboration with the Components, greatly facilitated meaningful progress. This includes several significant accomplishments not mentioned in the OIG's report, which taken together, meet the Secretary's direction of deploying C-UAS capability within one year as required by the memorandum.

For example, PLCY created the C-UAS PMO to ensure consistent planning, implementation, and oversight of the efforts to address the Secretary's memorandum, as well as to leverage existing expertise and resources from DHS's Science and Technology Directorate and Joint Requirements Council. PLCY also established the C-UAS



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Executive Steering Committee (ESC) to ensure robust governance and intra-agency collaboration. The immediate focus of PLCY's efforts was to document existing Departmental capabilities and identify any gap between needs in the December 2019 "Capability Analysis Report for C-UAS," which the ESC uses to guide requirements development efforts currently underway.

Beginning in 2019, in coordination with the Federal Aviation Administration, PLCY initiated a process to coordinate and deconflict DHS C-UAS activities with traditional National Air Space activities, thereby helping to ensure the safety of general, military, and civilian aviation operations. In addition, on September 9, 2019, DHS issued the "Secretary's Counter-Unmanned Aircraft Systems (C-UAS) Policy Guidance." This guidance directly supported the detection and mitigation of UAS threats during National Security Special Events, such as the 74th United Nations General Assembly, the New York City Marathon, multiple World Series Games, etc.

These are but a few of the many activities undertaken by the C-UAS PMO and are foundational aspects of DHS's uniform, repeatable approach to implementing its authorities, which enabled DHS's first deployment of C-UAS technologies. Ultimately, PLCY made the C-UAS effort operational within one year, as required by the Secretary.

PLCY remains focused on continuous improvement and maturation of DHS capabilities as funding becomes available and is committed to enhancing the nation's security posture against the rapidly evolving threat from unmanned aircraft systems by judiciously applying new C-UAS authorities and by harmonizing efforts in DHS and with our interagency partners.

The draft report contained four recommendations with which PLCY concurs. Attached find our detailed response to each recommendation. PLCY previously submitted technical comments under a separate cover for OIG's consideration.

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

Attachment



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Attachment: Management Response to Recommendations Contained in Project No. 19-004-AUD-DHS

OIG recommended that the Under Secretary for Strategy, Policy, and Plans:

Recommendation 1: Identify its budget requirements and convey those requirements to the [DHS] Office of the Chief Financial Officer for consideration as identified in the Secretary of Homeland Security's memorandum dated November 8, 2018.

Response: Concur. The DHS PLCY C-UAS PMO manages all C-UAS coordination across the Department and related interagency efforts. A fully functional PMO requires approximately \$5 million annually to support nine Full Time Equivalent staff and operating funds. PLCY submitted this requirement to the DHS Office of the Chief Financial Officer (OCFO) on April 5, 2020, as part of the formal Fiscal Year 2022-26 Resource Allocation Planning process.

We request that the OIG consider this recommendation resolved and closed, as implemented.

Recommendation 2: Conduct an objective workforce analysis of the C-UAS PMO to determine the appropriate staff needed to accomplish that office's mission cost-effectively.

Response: Concur. In addition to the \$5 million budget requirement submitted to DHS OCFO on April 5, 2020, PLCY will scope and execute a workforce analysis tailored to the requirements of the C-UAS PMO to address the need for a future state workforce analysis. To do so, PLCY will identify an appropriate funding source and the appropriate resource to perform the workforce analysis, as well as collaborate with Component partners to clearly delineate roles and responsibilities, in addition to prioritizing PMO functions to better identify required subject matter expertise, as appropriate. Estimated Completion Date (ECD): April 30, 2021.

Recommendation 3: Develop a timeline with achievable goals for C-UAS capability implementation across the Department.

Response: Concur. Establishing the DHS C-UAS PMO within PLCY's Office of Counterterrorism and Threat Prevention Policy enhanced DHS's implementation and oversight capacity, and enables the completion of tasks within established deadlines and improvements in interagency communications. The C-UAS PMO and Components made significant progress completing activities identified in the current workplan., and will work with Component partners to refresh the workplan by closing out completed



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milestones, prioritizing current activities, and establishing new milestones based on relevant projects. The C-UAS PMO will account for funding and staffing while developing milestones and deliverable dates. ECD: April 30, 2021.

Recommendation 4: Complete the Secretary's Counter Unmanned Aircraft Systems Policy Guidance, including the annexes specifying processes and procedures the Department needs to conduct C-UAS operations and ensure program uniformity and consistency.

Response: Concur. As of May 12, 2020, PLCY has completed three of the six required appendices, and is coordinating the remaining three draft appendices through the Department-wide clearance processes, as appropriate. ECD: December 31, 2020.



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Appendix B

Report Distribution

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Department of Homeland Security
Office of Inspector General, Mail Stop 0305
Attention: Hotline
245 Murray Drive, SW
Washington, DC 20528-0305