

OFFICE OF INSPECTOR GENERAL

# DHS Drug Interdiction Efforts Need Improvement



Homeland  
Security

**November 8, 2016**  
**OIG-17-09**



# DHS OIG HIGHLIGHTS

## *DHS Drug Interdiction Efforts Need Improvement*

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**November 8, 2016**

### **Why We Did This Audit**

The Office of National Drug Control Policy (ONDCP) is responsible for setting drug control priorities for the Federal Government. We conducted this audit to assess DHS' oversight efforts in relation to ONDCP's National Drug Control Strategy.

### **What We Recommend**

We made two recommendations that, if implemented, will improve DHS' drug interdiction efforts.

#### **For Further Information:**

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

### **What We Found**

We determined the Department's oversight of its drug interdiction efforts did not align with ONDCP's National Drug Control Strategy. The strategy sets goals and objectives for the drug control agencies to reduce illicit drug use, manufacturing and trafficking, drug-related crime and violence, and drug-related health consequences. Specifically, due to a lack of formal oversight roles and responsibilities, the Department did not: (1) report drug seizures and drug interdiction resource hours to ONDCP, and (2) ensure its components developed and implemented adequate performance measures to assess drug interdiction activities.

As a result, DHS could not ensure its drug interdiction efforts met required national drug control outcomes nor accurately assess the impact of the approximately \$4.2 billion it spends annually on drug control activities.

### **DHS Response**

DHS concurred with the recommendations.



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Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

November 8, 2016

MEMORANDUM FOR: The Honorable Russell C. Deyo  
Under Secretary for Management  
Department of Homeland Security

FROM: John Roth   
Inspector General

SUBJECT: *DHS Drug Interdiction Efforts Need Improvement*

Attached for your information is our final report, *DHS Drug Interdiction Efforts Need Improvement*. We incorporated the formal comments from the Department of Homeland Security in the final report.

The report contains two recommendations aimed at improving DHS' drug interdiction efforts. DHS concurred with both recommendations. Based on information provided in your response to the draft report, we consider recommendations 1 and 2 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 and of the disposition of any monetary amounts. Please send your closure request to [OIGAuditsFollowup@oig.dhs.gov](mailto: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 report on our website for public dissemination.

Please call me with any questions, or your staff may contact Don Bumgardner, Deputy Assistant Inspector General for Audits, at (202) 254-4100.

Attachment



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**Abbreviations**

|          |  |
|----------|--|
| AMO      | Air and Marine Operations                |
| CBP      | U.S. Customs and Border Protection       |
| CNE      | Office of Counternarcotic Enforcement    |
| GAO      | Government Accountability Office         |
| HSI      | Homeland Security Investigations         |
| ICE      | U.S. Immigration and Customs Enforcement |
| JIATF-S  | Joint Interagency Task Force - South     |
| OIG      | Office of Inspector General              |
| OMB      | Office of Management and Budget          |
| ONDCP    | Office of National Drug Control Policy   |
| strategy | National Drug Control Strategy           |



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### Background

One of the Department of Homeland Security's critical functions is to protect the Nation by interdicting illicit drugs headed for the United States through air, land, or maritime borders. DHS leads the Nation's interdiction efforts through a multicomponent-led approach, including the United States Coast Guard, U.S. Customs and Border Protection (CBP), and U.S. Immigration and Customs Enforcement (ICE). DHS' Office of Policy coordinates strategy and policy within the Department and identifies resource gaps in Department drug interdiction actions. In 2015, DHS components dedicated approximately \$4.2 billion, or about 11 percent of DHS' overall budget, toward drug control.

The Coast Guard is the lead Federal agency for maritime drug interdiction in international waters and shares responsibility for interdictions with CBP closer to shore. The Coast Guard's drug interdiction mission is to reduce the supply of drugs by denying smugglers the use of air and maritime routes. In addition to air interdiction, CBP is responsible for border security at and between all ports of entry. ICE combats smuggling and distribution, manufacture, and possession of illegal narcotics. ICE participates in task forces that conduct comprehensive attacks on major drug trafficking and money laundering organizations.

The *Anti-Drug Abuse Act of 1988*<sup>1</sup> created the Office of National Drug Control Policy (ONDCP), part of the Executive Office of the President, to coordinate drug-control activities and related funding across the Federal Government. It produces the annual National Drug Control Strategy (strategy), which sets goals and objectives for the drug control agencies to reduce illicit drug use, manufacturing and trafficking, drug-related crime and violence, and drug-related health consequences. The strategy's two overarching goals are to: (1) curtail illicit drug consumption in America, and (2) improve the public health and public safety of the American people by reducing the consequences of drug abuse.

To accomplish these goals, DHS is the designated lead agency for seven action items:

1. Improving Intelligence Exchange and Information Sharing
2. Implementing the National Southwest Border Counternarcotics Strategy
3. Implementing the National Plan for Outbound Interdiction of Currency and Weapons
4. Coordinating Efforts to Secure the Northern Border Against Drug-Related Threats

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<sup>1</sup> Public Law 100-690



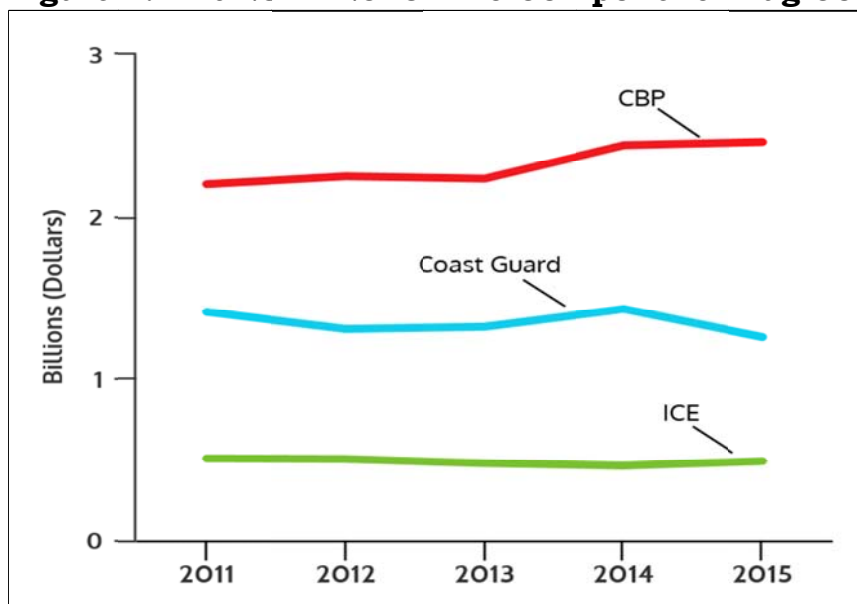


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5. Denying Use of Ports of Entry and Routes of Ingress and Egress between the Ports
6. Disrupting Surveillance Operations of Drug Trafficking Organizations
7. Disrupting Illicit Drug Trafficking in the Transit Zone<sup>2</sup>

In addition to setting drug control goals and objectives, ONDCP requires participating agencies to submit a detailed accounting of all funds expended for program activities during the previous fiscal year. Figure 1 represents DHS component drug control spending from fiscal years 2011 through 2015.

**Figure 1: FYs 2011–2015 DHS Component Drug Control Spending**



Source: DHS Office of Inspector General (OIG) analysis of DHS-component provided spending data

Overall, Federal drug control spending increased from \$21.7 billion in FY 2007 to approximately \$30.6 billion in allocated funding in FY 2016. Although total Federal drug control spending increased from FY 2007 through FY 2016, spending on supply reduction programs, such as domestic law enforcement, interdiction, and international programs, remained relatively constant at \$13.3 billion in FY 2007 and \$15.8 billion allocated in FY 2016. However, Federal spending for drug treatment and prevention steadily increased from \$8.4 billion in FY 2007 to \$14.7 billion in FY 2016. To aid in combating drug abuse in the United States, the *Comprehensive Addiction and Recovery Act of 2016* authorized the Federal Government to award grants to combat prescription opioid and heroin abuse.<sup>3</sup>

<sup>2</sup> The Transit Zone is a 6 million square mile area, including the Caribbean, Gulf of Mexico, and Eastern Pacific.

<sup>3</sup> Public Law 114-198



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The bulk of illegal drugs entering the United States originate from South America, passing through the Transit Zone. Once these drugs reach Central America, they are broken down into smaller packages and smuggled across the Southwest border into the United States. In his April 2016 testimony<sup>4</sup> before the Senate Committee on Homeland Security and Governmental Affairs, General John F. Kelly, United States Marine Corps (retired) and former commander of the United States Southern Command, stated, “Mexico is the source of heroin and meth[amphetamine] — and this includes the growing and harvesting of nearly 40,000 acres of poppies (DEA [Drug Enforcement Administration] estimates) and the labs to produce industrial quantities of both drugs using precursor chemicals imported in bulk from Asia.” Additionally he testified that Mexico is also the source of “enormous quantities of pirated pharmaceuticals.” Figure 2 shows the primary paths for the flow of drugs into the United States.

**Figure 2: Primary Paths for the Flow of Drugs into the United States**



Source: U.S. House of Representatives, Committee on Transportation and Infrastructure, June 2015

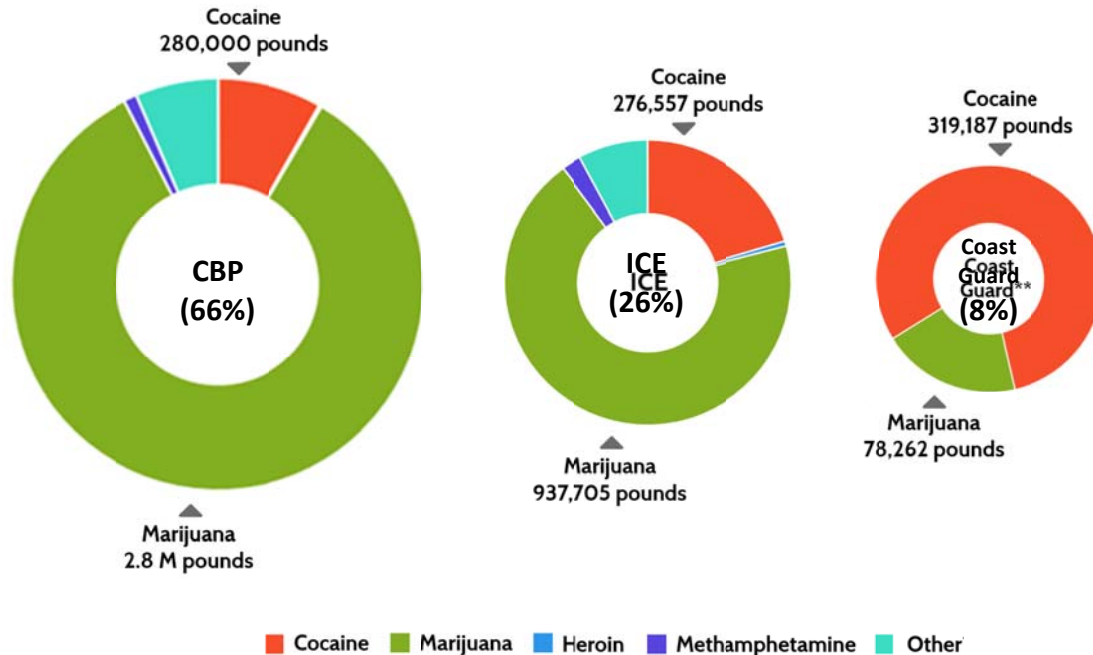
In contrast to marijuana and cocaine seizures, DHS interdicts relatively small amounts of methamphetamines and heroin. Figure 3 illustrates DHS component seizures by type and weight, as well as the percent of total DHS seizures, for FY 2015.

<sup>4</sup> “America’s Insatiable Demand for Drugs,” United States Senate Committee on Homeland Security and Governmental Affairs, April 13, 2016



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**Figure 3: FY 2015 DHS Component Drug Seizures in Pounds and by Percent of Total DHS Seizures**



Source: DHS OIG analysis of DHS component-provided drug seizure totals

<sup>1</sup>Heroin made up approximately .2% of CBP's seizures and therefore does not show up in this depiction.

<sup>2</sup>The Coast Guard provided cocaine and marijuana seizure data only.

<sup>3</sup>"Other" represents seized drug types such as ecstasy, psilocybin mushrooms, khat, and other illegal substances.

Cocaine, methamphetamine, and heroin production destined for the United States have risen dramatically in recent years. According to the *FY 2015 Coast Guard Drug Control Performance Summary Report*, the known cocaine flow through the Transit Zone via noncommercial means increased in FY 2015 to 1,254 metric tons from 945 metric tons in FY 2014.<sup>5</sup> Although cocaine flow increased in FY 2015, U.S. Navy counterdrug assets in the Transit Zone are projected to decline. In a June 2016 congressional testimony, a Coast Guard official noted the U.S. Navy's plans to decommission ships dedicated to counterdrug activities while deploying new combat ships away from the Transit Zone to the Pacific.

<sup>5</sup> OIG-16-28, *Review of U.S. Coast Guard's Fiscal Year 2015 Drug Control Performance Summary Report*, January 2016





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### Results of Audit

The Department's oversight of its drug interdiction efforts did not align with the National Drug Control Strategy. Specifically, the Department did not: (1) report drug seizures and drug interdiction resource hours to ONDCP as required, and (2) ensure its components developed and implemented adequate performance measures to assess the Department's drug interdiction activities as required. This occurred because DHS lacks formal oversight roles and responsibilities to ensure its drug interdiction performance activities met both ONDCP and legislative requirements. As a result, DHS could not ensure its drug interdiction efforts met required national drug control outcomes nor accurately assess the impact of the approximately \$4.2 billion it spends annually on drug control activities.

### Drug Interdiction Oversight Needs Improvement

Congress defunded the Department's drug coordination office in 2012. When transitioning drug coordination activities to a new office after defunding, DHS did not clearly define its roles and responsibilities in overseeing the agency-wide drug control effort. The *Intelligence Reform and Terrorism Prevention Act of 2004*<sup>6</sup> established the Department's Office of Counternarcotic Enforcement (CNE). Until 2012, CNE coordinated policy and operations within the Department and between the Department and other Federal, state, and local agencies to stop the entry of illegal drugs into the United States. In addition, CNE was responsible for ensuring adequacy of resources to counternarcotic entry prevention efforts, reporting to Congress an annual budget review, and evaluating DHS' counternarcotic activities.

In 2012, Congress defunded<sup>7</sup> CNE to streamline the Department's counternarcotic enforcement mission and transferred CNE's counternarcotic mission to the DHS Office of Policy. This office became responsible for integrating policy planning and coordination activities as well as optimizing existing planning and operations elements of its key law enforcement agencies. After CNE was defunded, Office of Policy counterdrug resources were greatly reduced. The previous CNE responsibilities shifted to the components.

While CNE responsibilities shifted to the components, illegal drug use in the United States increased. The Centers for Disease Control and Prevention reported from 2000 to 2014, drug overdose deaths in the United States increased 137 percent. In 2014, 47,055 people died from drug overdoses — more deaths than from car accidents. More specifically, overdose deaths

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<sup>6</sup> Public Law 108-458

<sup>7</sup> Public Law 112-74



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resulting from opioid use nearly quadrupled to 28,643 deaths in 2014 since 1999.<sup>8</sup> Increased availability, relatively low price, and high purity of heroin in the United States were cited as possible factors in the drug's rising abuse rate. According to the United States Drug Enforcement Administration, the amount of heroin confiscated at the United States southwest border quadrupled from 2008 to 2013.

According to Office of Management and Budget (OMB) Circular A-123, management must clearly define areas of authority and responsibility and appropriately delegate the authority and responsibility throughout the agency. However, Department officials did not formally define the roles and responsibilities for the new counterdrug office within the Office of Policy. CNE's roles and responsibilities were outlined by legislation, while the Office of Policy's were not.

DHS is taking steps to increase component coordination to combat transnational criminal organizations and drug trafficking. For example, as a part of the DHS Unity of Effort initiative announced in April 2014, DHS established the Southern Border and Approaches Campaign. This campaign guides DHS joint air, land, and maritime operations across the Nation's borders. DHS started the plan in January 2015, and as of February 2016 implementation is ongoing. However, at the time of our fieldwork, there were no formal memoranda of understanding between the participants detailing responsibilities.

### **DHS Did Not Report Required Drug Control Information**

The Department did not comply with legislative mandates for reporting data to ONDCP. In addition to performance measure reporting requirements, DHS must report its drug seizure statistics annually. According to 21 United States Code (U.S.C.) 1704, *Coordination with National Drug Control Program agencies in demand reduction, supply reduction, and State and local affairs*, DHS must annually submit to ONDCP and the appropriate congressional committees:

- the number and type of seizures of drugs by each component of DHS seizing drugs, as well as statistical information on the geographic areas of such seizures; and
- the number of air and maritime patrol hours primarily dedicated to drug supply reduction missions undertaken by each component of DHS.

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<sup>8</sup> Opioids are substances such as oxycodone, fentanyl, and heroin that work on the nervous system in the body or brain to reduce pain intensity.



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DHS last reported data to ONDCP in September 2011. DHS organized the data into a report containing summary drug seizure amounts and corresponding geographical locations by component. The Department did not address duplication when recording drug seizures made by more than one component. The Secretary of Homeland Security provided the report to ONDCP and select congressional committees.

### **Drug Interdiction Performance Measures Need Improvement**

Seven of the nine DHS drug interdiction performance measures did not effectively assess the impact of its drug interdiction efforts. The measures were not outcome based or did not assess activities directly related to combating drug smuggling organizations. In one instance, the measure could be expanded to more accurately assess component drug interdiction activity effects toward dismantling transnational criminal organizations (see table 1). This occurred because the Department did not establish minimum standards for components to use in developing effective performance measures. The Department instead relied on components to develop and implement performance measures to satisfy ONDCP priorities. As a result, DHS could not measure whether its drug interdiction efforts effectively support required national drug control outcomes.

ONDCP Circular *Accounting of Drug Control Funding and Performance Summary*, dated January 2013, requires an agency to explain how its performance measures clearly reflect their purpose and activities, enable assessment of agency contribution to the strategy, are outcome oriented, and are used in agency management. According to OMB Circular A-11,<sup>9</sup> strategic, outcome-based measures provide a way of measuring effectiveness.

#### Measuring DHS' Support of the ONDCP's Strategy Goals and Objectives

The ONDCP's strategy sets overarching goals and objectives for the drug control agencies across the Federal Government. The strategy designated DHS as the lead agency for seven action items. DHS' action items address securing the Nation's borders as well as combating maritime drug smuggling. The desired outcomes for the execution of DHS' action items are:

- disruption of domestic drug trafficking and production; and
- strengthening of international partnerships and reduction in the availability of foreign-produced drugs in the United States.

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<sup>9</sup> Office of Management and Budget Circular A-11, *Preparation, Submission, and Execution of the Budget*, June 2015



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As shown in table 1, of the Department’s nine performance measures for assessing progress towards these action items, we determined seven (78 percent) were process, not outcome based; did not assess activities directly related to strategy outcomes; or could be expanded to improve existing measures’ effectiveness.

**Table 1: Drug Interdiction Performance Measures by Component**

| Component          | Performance Measure   | OIG Evaluation   |
|--------------------|---|--|
| <b>CBP</b>         | 1. Amount of currency seized on exit from the United States   | Process, not outcome-based and not sufficiently relevant to counterdrug activities |
|                    | 2. Percentage of Joint Interagency Task Force-South (JIATF-S) annual mission hour objective achieved  | Process, not outcome-based   |
|                    | 3. Percent of time TECS <sup>10</sup> system is available to end users  | Process, not outcome-based   |
|                    | 4. Interdiction effectiveness rate on the Southwest border between the Ports of Entry   | Outcome-based, but not sufficiently relevant to counterdrug activities             |
| <b>Coast Guard</b> | 5. Cocaine removal rate   | Outcome-based, but could be expanded to include other drug types removed           |
| <b>ICE</b>         | 6. Percentage of overseas investigative hours spent on drug-related cases   | Process, not outcome-based   |
|                    | 7. Number of counternarcotics intelligence requests satisfied   | Process, not outcome-based   |
|                    | 8. Percent of significant high-risk transnational criminal investigations that result in a disruption or dismantlement  | Outcome-based, sufficiently measures counterdrug impacts                           |
|                    | 9. Percent of transnational drug investigations resulting in the disruption or dismantlement of high threat transnational drug trafficking organizations or individuals | Outcome-based, sufficiently measures counterdrug impacts                           |

Source: DHS OIG analysis of Component Drug Control Performance Summary Reports

<sup>10</sup> TECS (not an acronym) is an information-sharing system containing enforcement, inspection, and operational records relevant to CBP’s law enforcement and anti-terrorism mission.



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#### CBP Drug Interdiction Performance Measures

We determined that CBP's drug interdiction performance measures were generally process, not outcome based — or were not sufficiently relevant to counterdrug activities. CBP annually reports four drug interdiction performance measures to ONDCP. For example, CBP tracks the total dollar amount of currency seized during inspection of passengers and vehicles leaving the United States. It also tracks the interdiction effectiveness rate on the Southwest border, which is the percentage of individuals apprehended or turned back to Mexico on the Southwest border.

These performance measures are important in determining CBP's overall currency seizures and migrant apprehensions. However, they do not differentiate between total seized currency and apprehension of individuals with those associated with drug smuggling. For example, CBP personnel confirmed that although all seized currency is counted toward its performance measure, not all currency seized is associated with drug smuggling activity. Likewise, the interdiction effectiveness rate generally accounts for the individuals apprehended or turned back to Mexico, but does not specify which individuals are connected to drug smuggling activities. As a result, CBP cannot determine the effectiveness of its enforcement actions specifically in relation to its success in combating drug smuggling organizations.

Additionally, CBP tracks whether it meets its intended flight hours in support of JIATF-S' maritime anti-drug operations, but this measure does not determine the effectiveness of the flight hours. JIATF-S is responsible for detecting and monitoring illicit drug trafficking in the air and maritime environments while operating in the Transit Zone. Meeting the JIATF-S' flight hour obligation is an important factor in disrupting drug trafficking activities by leveraging CBP's air surveillance capabilities. However, CBP's performance measure would be more effective if it determined what percentage of flight hours spent detecting and monitoring drug smuggling activities resulted in drug seizures or collection of vital intelligence.

CBP also measures the percent of time TECS is available to end users. Although TECS is a critical law enforcement tool, we could not determine a clear link between its availability percentage and desired strategy outcomes.

In its June 2015 annual budget preparation guidance, ONDCP recommended that CBP improve its performance measures by including a focus on drug-related outcomes.





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#### Coast Guard Drug Interdiction Performance Measure

Although the Coast Guard's cocaine removal rate performance measure was outcome based, it could be expanded to include additional drug types. The Coast Guard's drug interdiction mission supports national and international strategies to deter and disrupt the market for illegal drugs and dismantle transnational criminal organizations. To assess its mission success, the Coast Guard annually reports the cocaine removal rate to ONDCP. The amount of cocaine removed is the sum of all cocaine that is physically seized by the Coast Guard and all cocaine lost by the transnational criminal organizations due to the Coast Guard's actions. Although the Coast Guard's efforts focus primarily on its ability to combat the flow of cocaine, the component could develop similar measures for other seized drug types. A 2015 independent, third-party review<sup>11</sup> of Coast Guard performance measures recommended the component expand the scope of illicit activity being measured beyond cocaine.

The review states:

The metrics associated with the movement of marijuana, methamphetamines, cash, and weapons are potential sources of leading and trailing indicators of the overall effectiveness of the entire drug interdiction enterprise. Drugs other than cocaine are also important sources of revenue for Drug Trafficking Organizations. Also, in some districts, these drugs constitute an important or dominant portion of the maritime drug flow. While cocaine interdiction remains a national goal, and one for which national and Coast Guard goals are set, data on other drugs can also be relevant.

The Coast Guard is considering these suggested changes, but as of April 2016, it has taken no action. Additionally, in ONDCP's FY 2017 drug control funding request, it recommended that the Coast Guard implement an additional measure to report its efforts to support the joint Department of State and Coast Guard Interdiction and Prosecution Team.

#### ICE Drug Interdiction Performance Measures

We determined that two of ICE's four performance measures are outcome based and sufficiently measure impacts of counterdrug activities, and two are process, not outcome based. As discussed previously in table 1, ICE reports four drug interdiction performance measures annually to ONDCP. Two of the four ICE performance measures effectively measured the success of meeting the strategy's desired outcomes:

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<sup>11</sup> See appendix C.



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- percent of significant high-risk transnational criminal investigations that result in a disruption or dismantlement; and
- percent of transnational drug investigations resulting in the disruption or dismantlement of high threat transnational drug trafficking organizations or individuals.

ICE developed these measures as a result of recommendations from a 2006 Government Accountability Office (GAO) report.<sup>12</sup> ICE leadership collaborated with other law enforcement agencies such as the Federal Bureau of Investigation and the Drug Enforcement Administration to develop the outcome-based measures. In 2014, DHS' Program Analysis and Evaluation Division contracted an independent third party to review ICE's "percent of transnational drug investigations resulting in the disruption or dismantlement of high-threat transnational drug trafficking organizations or individuals" performance measure. The review confirmed this measure was outcome based.

ICE's other performance measures relate to its counterdrug mission by measuring the number of counternarcotics requests satisfied and percentage of overseas investigative hours spent on drug related cases. Although these measures show the component's commitment to anti-drug efforts, they do not evaluate the effectiveness of the intelligence products produced or investigative hours spent on drug-related cases. For example, assessing the quality of intelligence products in terms of overall impact on drug smuggling organizations would better determine progress toward meeting the strategy's desired outcomes. Similarly, determining the quality of overseas investigative hours that negatively impact drug smuggling organizations would better assess ICE's progress toward meeting strategy outcomes.

### Lack of Performance Measure Guidance

With the exception of ICE's outcome-based performance measures, DHS components lacked measures that accurately assess progress towards achieving desired outcomes of the strategy. This occurred because the Department did not establish minimum standards for components to use in developing effective performance measures. The Department instead relied on components to develop and implement performance measures to satisfy ONDCP priorities. As a result, component performance measures did not fully support required national drug control outcomes.

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<sup>12</sup> GAO-06-48SU, *Better Management Practices Could Enhance DHS's Ability to Allocate Investigative Resources* and GAO-06-462T, *Better Management Practices Could Enhance DHS's Ability to Allocate Investigative Resources*



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#### Progress in Improving Performance Measures

DHS and ONDCP recognize that performance measures need improvements and have taken steps to address these improvements. In addition to Coast Guard and ICE independent reviews, DHS and ONDCP contracted for additional reviews of existing performance measures; see appendix C. As part of its newly implemented Southern Borders and Approaches Campaign Plan, the Department signed an interagency agreement with the Department of Defense in August 2015 to measure the illegal entry of people and goods.<sup>13</sup> The contractor recommended that DHS develop a new set of outcome metrics for drug interdiction, and the Secretary agreed.

Additionally, ONDCP awarded a contract to comprehensively review all drug supply reduction activity performance measures across the Federal Government. In October 2015, the contractor began assessing agency counterdrug activities — with input from stakeholders including DHS — and will develop new or improve existing performance measures if necessary. The review’s findings and recommendations are pending the completion of the review.

CBP’s Air and Marine Operations (AMO) also took steps to improve its performance measures by establishing a working group to develop key interdiction outcomes and metrics. CBP AMO plans to implement its new metrics beginning in FY 2017.

#### **Other Observation: Joint Operations Resulted in Duplicate Recording of Drug Seizure Data**

During our audit, we identified a potential issue that could affect the Department’s ability to accurately report the total amount of drugs it seizes during component operations. During our interviews with stakeholders, component officials noted the potential for duplication when recording drug seizures made by more than one agency. As a result, we conducted limited testing on drug seizure data to determine whether components duplicated drug seizure data within their systems.

We found duplication in data recording when CBP and ICE are part of joint operations. Components track and report their drug seizure data using individual systems of record. We reviewed examples of components’ internal

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<sup>13</sup> The contractors focused on cocaine due to the unavailability of historical data on other drug types.



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tracking on drug seizure data<sup>14</sup> and found 437 cases of duplication in CBP and ICE data. Combining these duplicated drug seizures could give the perception that DHS is interdicting more drugs than it is.

As part of DHS' drug control strategy, components work together in joint operations. For example, CBP, ICE, and other law enforcement organizations work together in Border Enforcement Security Task Forces to investigate transnational criminal activity along the Southwestern and Northern borders and at the Nation's major seaports. We found instances of CBP and ICE recording the same seizure data in their individual component systems of record when participating in the task force operations.

We found 437 instances of duplicated drug seizure entries when comparing CBP and ICE component and subcomponent FY 2015 data. Approximately 78,573 pounds of drugs are associated with the duplicated drug seizures. ICE's Homeland Security Investigations (HSI) and CBP AMO accounted for the majority of duplicated drug seizure entries and drug amounts, with 263 instances of duplication accounting for a total of approximately 45,853 pounds of drugs. For example, we identified duplicated records of drug seizures totaling over 2,000 pounds in both CBP AMO and ICE HSI systems. Additionally, our analysis found 22 instances of identical drug seizures totaling approximately 5,347 pounds recorded in CBP AMO and Office of Field Operations as well as ICE HSI systems.

In addition to CBP and ICE, the Coast Guard conducts joint operations with DHS components. Although it maintains its own internal system to record drug seizures, the Coast Guard also uses the Department of Defense's Consolidated Counterdrug Database to record and report drug seizures. The system consolidates participating agencies' seizure data under one entry per seizure, therefore preventing users from counting drug seizures multiple times.

Duplication in CBP and ICE seizure data occurred because both DHS and the components lacked policies and procedures for recording joint drug seizures. According to a DHS official, DHS is aware of components duplicating drug seizure data. For this reason, DHS does not combine component drug seizure figures when reporting to external stakeholders, and we did not observe any instances of DHS combining component drug seizure totals for reporting purposes. Because the Department could not accurately total component drug seizure data, it could not reliably determine the total drugs it has seized. The Department may want to address this potential issue and take corrective action as necessary.

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<sup>14</sup> We conducted limited testing to determine the accuracy of ICE and CBP drug seizure data recorded as part of joint operations; see appendix A. The data tested is distinct and separate from the drug seizure data required by 21 U.S.C. 1704.



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### Conclusion

Although DHS developed new organizational structures through the creation of the Southern Borders and Approaches Campaign, DHS lacks a centralized authority responsible for its counterdrug activities. Given the increase in cocaine, methamphetamine, and heroin production destined for the United States, as well as the expansion of transnational criminal organizations, it is critical that the Department effectively supports the Nation's drug control mission. Without effective performance measures or consistent drug seizure recording and reporting, DHS cannot ensure it is supporting the Federal Government counterdrug priorities to its full potential. Additionally, without accurate and effective performance measurement DHS cannot ensure it maximized the \$4.2 billion components spent in FY 2015 on counterdrug activities.

### Recommendations

We recommend that the Under Secretary for Management:

**Recommendation 1:** Develop and implement a plan to ensure compliance with 21 U.S.C. 1704 that mandates DHS must annually submit to ONDCP and the appropriate congressional committees:

- the number and type of seizures of drugs by each component of DHS seizing drugs, as well as statistical information on the geographic areas of such seizures; and
- the number of air and maritime patrol hours primarily dedicated to drug supply reduction missions undertaken by each component of DHS.

**Recommendation 2:** Develop and implement a plan to ensure components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts.

### Management Comments and OIG Analysis

The Department concurred with our recommendations and provided comments to the draft report. A summary of DHS' management comments and our analysis follows. We have included a copy of these comments in their entirety in appendix B. DHS also provided technical comments, which we incorporated as appropriate.

**Recommendation #1:** DHS concurred. According to the Department, the DHS Office of the Chief Financial Officer, Program Analysis and Evaluation Division will coordinate with CBP, ICE, and the Coast Guard to develop a plan that





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ensures required annual reports are submitted to the ONDCP and the appropriate congressional committees. The estimated completion date is October 31, 2017.

**OIG Analysis:** The actions DHS has proposed appear to meet the intent of recommendation #1. This recommendation will remain resolved and open until we have reviewed documentation confirming that a plan has been developed to ensure required annual reports are submitted to the ONDCP and the appropriate congressional committees.

**Recommendation #2:** DHS concurred. According to the Department, the DHS Office of the Chief Financial Officer, Program Analysis and Evaluation Division will coordinate with CBP, ICE, the Coast Guard, and the ONDCP to develop and implement a plan that ensures new or enhanced existing, outcome-based performance measures are used to assess the success of drug interdiction efforts. The estimated completion date is October 31, 2017.

**OIG Analysis:** The actions DHS has proposed appear to meet the intent of recommendation #2. This recommendation will remain resolved and open until we have reviewed documentation confirming that a plan has been developed and implemented to ensure outcome-based performance measures are used to assess the success of drug interdiction efforts.



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## **Appendix A**

### **Objective, Scope, and Methodology**

The DHS Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the Department. We conducted this audit to determine the extent to which DHS is executing its responsibilities under the National Drug Control Strategy.

Our audit assessed the Department's drug interdiction activities from FY 2011 through FY 2015. We researched and reviewed Federal laws, regulations, strategies, directives, and performance reports. We reviewed prior OIG and GAO reports for previously identified findings and recommendations related to our audit. We reviewed DHS component drug control spending. Component drug control spending is independently validated annually by our office; we were unable to complete review procedures for portions of CBP's spending calculations for FY 2014 through FY 2015. Specifically, our review of CBP's FY 2015 Detailed Accounting Submission found CBP management was unable to provide supporting documentation for the underlying assumptions used to calculate the total obligations reported. As a result, we were unable to complete our review procedures over those assumptions.

We conducted interviews with officials from ONDCP and DHS' Office of Intelligence and Analysis, Office of Policy, and the Office of the Chief Financial Officer's Program Analysis and Evaluation Division. We also interviewed officials from the Coast Guard; CBP's Office of Field Operations, U.S. Border Patrol, AMO, and Office of Administration; and ICE's HSI.

To understand DHS' drug interdiction operations, we conducted a site visit to interview Department of Defense officials at Joint Interagency Task Force-South in Key West, FL, and attended a Consolidated Counterdrug Database Collection and Validation meeting at the El Paso Intelligence Center in El Paso, TX.

We assessed the performance measures the Department's components currently report to ONDCP and reviewed criteria for outcome-based performance measures. To determine the drug interdiction performance measures being considered by the Department, we reviewed third-party contracts and work performed to date.

Additionally, we reviewed DHS' drug seizure data from FY 2011 through FY 2015. We conducted limited testing of FY 2015 drug seizures data by



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comparing and analyzing CBP and ICE data to identify instances of duplicate recording of drug seizures made during joint operations. We obtained component data from component-specific systems and compared incident numbers between data sets to identify duplicate entries. We totaled the drug weights for these entries to obtain the amount of drugs duplicated among component systems. Although we did not independently verify the accuracy of the agencies' self-reported drug seizure data, we took steps to minimize potential errors and problems while conducting our analysis. For example, we reviewed component drug seizure data to identify missing and inconsistent records or key data elements critical to conducting the analysis. Component officials clarified inconsistencies in drug seizure data during follow-up meetings. As a result, we determined the information obtained was sufficiently reliable for this report.

We omitted Federal Law Enforcement Training Centers from our fieldwork analysis because the centers do not conduct drug seizure activities. Additionally, Federal Law Enforcement Training Centers' annual drug control spending is significantly lower than the other components included in the scope of our review.

We conducted this performance audit between June 2015 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.



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**Appendix B**  
**DHS Comments to the Draft Report**


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



**Homeland  
Security**

October 24, 2016

MEMORANDUM FOR: John Roth  
Inspector General

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

SUBJECT: Management's Response to OIG Draft Report: "DHS Drug  
Interdiction Efforts Need Improvement"  
(Project No. 15-003-AUD-DHS)

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.

DHS is pleased to note the OIG's recognition of the new organizational structures developed through the creation of the Southern Border and Approaches (SBA) Campaign and steps being taken to increase component coordination, to combat transnational criminal organizations and drug trafficking. DHS leads the Nation's efforts to secure the SBA by:

- (1) using a deliberate, joint operational approach to achieve unity of effort and greater levels of security throughout the SBA area of responsibility; and
- (2) providing for DHS-wide, cross-Component, unified operations across air, land, and maritime domains to better understand and counter adversary efforts from the source zone, along legal and illegal transit zone pathways, and through networks, to the homeland.

The Department is committed to continuing to strengthen its coordination efforts to interdict drug trafficking and disrupt their links to terrorism and organized crime, in support of the Office of National Drug Control Policy's (ONDCP) National Drug Control Strategy.

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



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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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### **Attachment: DHS Management Response to Recommendations Contained in OIG Project No. 15-003-AUD-DHS**

The OIG recommended that the Under Secretary for Management:

**Recommendation 1:** Develop and implement a plan to ensure compliance with 21 U.S.C. 1704 that mandates DHS must annually submit to ONDCP and the appropriate congressional committees:

1. the number and type of seizures of drugs by each component of DHS seizing drugs, as well as statistical information on the geographic areas of such seizures; and
2. the number of air and maritime patrol hours primarily dedicated to drug supply reduction missions undertaken by each component of DHS.

**Response:** Concur. The DHS Office of the Chief Financial Officer (OCFO), Program Analysis and Evaluation Division (PA&E) will coordinate with U.S. Customs and Border Protection (CBP), U.S. Immigration and Customs Enforcement (ICE), and the U.S. Coast Guard (USCG) to develop a plan which ensures that required annual reports are submitted to the ONDCP and the appropriate Congressional committees. Estimated Completion Date (ECD): October 31, 2017.

**Recommendation 2:** Develop and implement a plan to ensure components develop outcome-based performance measures that adequately assess the success of drug interdiction efforts.

**Response:** Concur. The DHS OCFO PA&E will coordinate with CBP, ICE, the USCG, and the ONDCP to develop and implement a plan which ensures that new or enhanced existing, outcome-based performance measures are used to assess the success of drug interdiction efforts. ECD: October 31, 2017.



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**Appendix C**  
**Third-Party Reviews of DHS Drug Interdiction Performance Measures**

| <b>Name of Review</b>  | <b>Month/Year completed</b> | <b>Objective</b>  | <b>Recommendation(s)</b>   |
|--|-----------------------------|---|--|
| <b>Immigration &amp; Customs Enforcement (ICE) Independent Verification and Validation of Performance Measure Data</b> | August 2014                 | To conduct a validation and verification review of ICE's performance metric percent of transnational drug investigations resulting in the disruption or dismantlement of high-threat transnational drug trafficking organizations or individuals.   | ICE conduct a follow-up study of the accuracy of the impact assessments<br><br>Status: In progress         |
| <b>Enhancing Coast Guard Metrics</b>   | October 2015                | To identify ways that the United States Coast Guard could improve how it measures its operational performance.  | Use contractor-provided metrics to evaluate and improve Coast Guard operations.<br><br>Status: In progress |
| <b>DHS's Planning, Programming, Budgeting and Execution Support and Program Analysis (Inter Agency Agreement)</b>      | In progress                 | To provide analyses and metrics to: <ul style="list-style-type: none"> <li>• manage business processes to achieve long-term outcomes and results;</li> <li>• improve near-term oversight and management of border and immigration operations in coordination with the new Joint Task Force Directors; and</li> <li>• communicate results clearly to the American people and Congress.</li> </ul>  | None at this time; review is in progress.  |
| <b>Interagency Supply Reduction Goals and Performance Measures Working Group Support (ONDCP)</b>                       | In progress                 | To provide analyses and metrics to: <ul style="list-style-type: none"> <li>• provide clearly identified and discrete goals that reflect the Administration's priorities regarding the interdiction/disruption of illicit narcotics and associated transnational criminal networks;</li> <li>• develop, capture, refine, analyze, and report a broad array of performance indicators that adequately reflect the status of activities (outputs and outcomes); and</li> <li>• develop measures of performance for supply-reduction activities.</li> </ul> | None at this time; review is in progress.  |

Source: DHS OIG analysis of third-party reviews conducted by Energetics, RAND Corporation Studies, Price Waterhouse Cooper, and Institute for Defense Analyses



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**Appendix D**  
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**Appendix E**  
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