

**Review of U.S. Coast Guard's
Fiscal Year 2018
Drug Control Performance
Summary Report**





DHS OIG HIGHLIGHTS

Review of U.S. Coast Guard's Fiscal Year 2018 Drug Control Performance Summary Report

March 8, 2019

Why We Did This Review

The Office of National Drug Control Policy's (ONDCP) Circular, *Accounting of Drug Control Funding and Performance Summary*, requires each National Drug Control Program agency to submit to ONDCP Director a detailed accounting of all funds expended for National Drug Control Program activities during the previous fiscal year.

The Office of Inspector General (OIG) is required to conduct a review of the report and provide a conclusion about the reliability of each assertion made in the report.

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

Williams Adley & Company – DC, LLP (Williams Adley), under contract with the Department of Homeland Security OIG, issued an Independent Accountant's Report on U.S. Coast Guard's (Coast Guard) fiscal year (FY) 2018 Drug Control Performance Summary Report. Coast Guard's management prepared the Performance Summary Report and the related disclosures in accordance with requirements of ONDCP Circular, *Accounting of Drug Control Funding and Performance Summary*, dated May 8, 2018 (the Circular). Based on its review, nothing came to Williams Adley's attention that caused it to believe that the Coast Guard's FY 2018 Performance Summary Report is not presented in conformity with the criteria in the Circular. Williams Adley did not make any recommendations as a result of its review.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

March 8, 2019

MEMORANDUM FOR: Rear Admiral Thomas G. Allan, Jr.
Assistant Commandant for Resources and
Chief Financial Officer
U.S. Coast Guard

FROM: Sondra F. McCauley 
Assistant Inspector General for Audits

SUBJECT: *Review of U.S. Coast Guard's Fiscal Year 2018
Drug Control Performance Summary Report*

Attached for your information is our final report, *Review of U.S. Coast Guard's Fiscal Year 2018 Drug Control Performance Summary Report*. Coast Guard's management prepared the Performance Summary Report and the related disclosures in accordance with the requirements of the Office of National Drug Control Policy's Circular, *Accounting of Drug Control Funding and Performance Summary*, dated May 8, 2018.

We contracted with the independent public accounting firm Williams Adley & Company - DC, LLP (Williams Adley) to review Coast Guard's Drug Control Performance Summary Report. Williams Adley is responsible for the attached Independent Accountant's Report, dated February 28, 2019, and the conclusions expressed in it. Williams Adley's report contains no recommendations.

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

Please call me with any questions at (202) 981-6100, or your staff may contact Maureen Duddy, Deputy Assistant Inspector General for Audits, at (617) 565-8723.

Attachment



Independent Accountant's Report

Inspector General
United States Department of Homeland Security

We have reviewed management's assertions related to the Performance Summary Report (PSR) of the U.S. Department of Homeland Security's (DHS) United States Coast Guard (USCG) for the year ended September 30, 2018. USCG management is responsible for the preparation of the PSR in accordance with requirements of the Office of National Drug Control Policy Circular: *Accounting of Drug Control Funding and Performance Summary*, dated May 8, 2018 (the Circular). Our responsibility is to express a conclusion on the PSR and management's assertions based on our review.

Our review was conducted in accordance with generally accepted government auditing standards, which incorporate the attestation standards established by the American Institute of Certified Public Accountants. Those standards require that we plan and perform the review to obtain limited assurance about whether any material modifications should be made to the PSR or PSR assertions in order for them to be in accordance with the Circular. A review is substantially less in scope than an examination, the objective of which is to obtain reasonable assurance about whether USCG's PSR and PSR assertions are in accordance with the Circular, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. We believe that our review provides a reasonable basis for our conclusion.

Based on our review, we are not aware of any material modifications that should be made to the PSR or the PSR assertions for the year ended September 30, 2018, in order for them to be in accordance with the requirements set forth in the Circular.

This report is intended solely for the information and use of USCG and the Office of National Drug Control Policy, and is not intended to be, and should not be, used by anyone other than the specified parties.

Williams, Adley & Company-DC, LLP

Washington, District of Columbia
February 28, 2019

WILLIAMS, ADLEY & COMPANY-DC, LLP
Certified Public Accountants/Management Consultants

1030 15th Street, NW, Suite 350 West • Washington, DC 20005 • (202) 371-1397 • Fax: (202) 371-9161
www.williamsadley.com



16012
February 27, 2019

Mr. John Kelly
Acting Inspector General
Department of Homeland Security
Office of the Inspector General

Dear Mr. Kelly,

In compliance with the Office of National Drug Control Policy (ONDCP) Circular, *Accounting of Drug Control Funding and Performance Summary*, dated May 8, 2018, the U.S. Coast Guard (Coast Guard) submits its enclosed Performance Summary Report to ONDCP. The report contains the results of the Coast Guard's Fiscal Year (FY) 2018 performance in support of the *National Drug Control Strategy*.

Coast Guard Management makes the following assertions:

- (1) **Performance reporting system is appropriate and applied** – The Coast Guard utilizes the interagency Consolidated Counterdrug Database (CCDB) to provide data for the Coast Guard performance reporting system. This performance reporting system, as detailed within the enclosed report, is appropriate and applied. It was reviewed in the most recently available 2007 Independent Program Evaluation by the Center for Naval Analyses and a 2007 Office of Management and Budget (OMB) Program Assessment Rating Tool (PART) evaluation. Both reviews verified the appropriateness and application of the performance reporting system, and the Coast Guard has made all significant changes recommended to ensure continued validity.
- (2) **Explanations for not meeting performance targets are reasonable** – The Coast Guard did not meet its FY 2018 performance target. The explanations offered for failing to meet the target are reasonable.
- (3) **Methodology to establish performance targets is reasonable and consistently applied** – The Coast Guard methodology to establish performance targets is reasonable and consistently applied. The Coast Guard uses a quantitative and qualitative process that reviews intelligence, logistics, strategic and operational policy, capability, emerging trends, past performance, and capacity variables impacting mission performance to establish performance targets. Targets generated by the program manager are reviewed independently by performance and budget oversight offices at Coast Guard Headquarters, as well as the Department of Homeland Security (DHS) Office of Program Analysis and Evaluation, prior to entry into budget documents and the DHS Future Years Homeland Security Program (FYHSP) database.

(4) Adequate performance measures exist for all significant drug control activities – The Coast Guard has established one acceptable performance measure that covers all four budget decision units (Operating Expenses; Reserve Training; Acquisition, Construction, and Improvements; and Research, Development, Test and Evaluation). The metric was most recently subject to review by the DHS Office of the Inspector General (OIG) in FY 2016, as documented per OIG Report 17-09, *DHS Drug Interdiction Efforts Need Improvement*, issued on November 8, 2016. The OIG report noted the Coast Guard's performance measure was adequate, but could be expanded to include other drug types. The Coast Guard is considering these suggested changes. However, the Coast Guard has determined the FY 2018 performance measure does not require material modification.

If you require further assistance on this information, please contact LCDR Christopher Kimrey, 202-372-3149.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kathryn Clevenger-Herty', with a long horizontal flourish extending to the right.

Kathryn Clevenger-Herty
Captain, U.S. Coast Guard
Chief, Office of Performance Management
& Assessment

Enclosure (1) FY 2018 Performance Summary Report

Copy: DHS Office of Program Analysis and Evaluation

Drug Budget

United States Department of Homeland Security

United States Coast Guard

Performance Summary Report FY 2018

I. PERFORMANCE INFORMATION

NOTE: *Although the United States Coast Guard (Coast Guard) appropriation is apportioned along budget decision unit lines (i.e., Acquisitions, Construction & Improvements (AC&I), Operating Expenses (OE), Research Development Testing and Evaluation (RDT&E), and Reserve Training (RT)), the Coast Guard does not manage performance along decision unit lines. This is impractical due to the multi-mission performance of our assets, which transcends budget decision units. Thus, the Coast Guard received permission from the Office of National Drug Control Policy (ONDCP) to present one metric for all four decision unit lines.*

This section is based on Coast Guard data and DHS Government Performance and Results Act (GPRA) documents.

The Coast Guard's Drug Interdiction mission supports national and international strategies to deter and disrupt the market for illegal drugs, dismantle Transnational Criminal Organizations (TCOs), and prevent transnational threats from reaching the United States (U.S.). The Coast Guard is the lead federal agency for drug interdiction on the high seas, and shares the lead in U.S. territorial seas with U.S. Customs and Border Protection (CBP). In carrying out this mission, the Coast Guard receives assistance from a variety of international and domestic partners including the U.S. Department of Defense, the Drug Enforcement Administration, and Immigration and Customs Enforcement. The objectives of the Coast Guard strategy are to: (1) maintain a strong interdiction presence to deny smugglers access to maritime routes and deter trafficking activity; (2) strengthen ties with source¹ and transit² zone nations to increase their willingness and ability to reduce the production and trafficking of illicit drugs within their sovereign boundaries, including territorial seas; and (3) support interagency and international efforts to combat drug smuggling through increased cooperation and coordination. Coast Guard operations align with the President's National Drug Control Strategy and ONDCP's National Interdiction Command and Control Plan, which target the flow of cocaine and other illicit drugs toward the U.S.

The Coast Guard's drug interdiction performance is best summarized by the program's performance measure, the Cocaine Removal Rate. This measure indicates how effective the program is at disrupting the flow of cocaine traveling via non-commercial maritime means toward the U.S. The more cocaine bound for the U.S. removed by the Coast Guard, the less cocaine available for consumption in the U.S.

¹ The source zone includes the principal drug producing countries of Bolivia, Columbia, and Peru.

² The transit zone encompasses Central America, Mexico, the Caribbean Sea, the Gulf of Mexico, and the eastern Pacific Ocean.

Performance Measure

Cocaine Removal Rate: Removal rate for cocaine from non-commercial vessels in the maritime Transit Zone.

NOTE: In accordance with ONDCP Circular: *Accounting of Drug Control Funding and Performance Summary* the below table presents the performance information for the previous four fiscal years (FY 2015 – 2018) compared to the target level. The table additionally presents the target established for the current fiscal year (FY 2019).

Year:	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
Target:	13.8%	11.5%	11.5%	10.0%	10.0%
Actual:	11.5%	7.1%	8.2%	7.4%	N/A

Table 1: Performance Targets and Results (Cocaine Removal Rate)

This represents the percent of cocaine removed (seized by the Coast Guard, and jettisoned, scuttled, or destroyed as a result of Coast Guard law enforcement action) in relationship to the non-commercial maritime movement of cocaine. The Cocaine Removal Rate (Table 1) is calculated by dividing the total amount of cocaine removed by the Coast Guard by the total estimated non-commercial maritime movement of cocaine towards the U.S (Table 2).

Year:	FY 2015	FY 2016	FY 2017	FY 2018
Flow:	1,254	2,834	2,738	2,827.3
Removed:	144.8	201.3	223.8	209.6

Table 2: Non-Commercial Maritime Cocaine Flow and Tonnage Removed (in Metric Tons)

The amount of cocaine removed by the Coast Guard is the sum of all cocaine that is physically seized by Coast Guard personnel and all cocaine lost by the transnational criminal organizations (TCOs) due to the Coast Guard's actions. The latter amount is, at times, an intelligence-based estimate of the quantity of cocaine onboard a given vessel that is burned, jettisoned, or scuttled in an attempt to destroy evidence when Coast Guard presence is detected. The estimated non-commercial maritime flow of cocaine towards the U.S. is extracted from the interagency-validated Consolidated Counter Drug Database (CCDB).

According to the CCDB, the known cocaine flow through the transit zone via non-commercial means increased by three percent in FY 2018 to 2,827.3 metric tons from 2,738 metric tons in FY 2017. The Coast Guard removed 209.6 metric tons of cocaine from the Transit Zone in FY 2018 equating to a 7.4 percent removal rate for non-commercial maritime cocaine flow. While the Coast Guard did not meet its performance target of removing 10% of non-commercial maritime cocaine flow, the Coast Guard did meet its removal target of 200 metric tons. Further, the Coast Guard removed more tonnage of cocaine per interdiction in FY 2018 than any time since FY 2008. It is important to note that although the tonnage per interdiction has increased, the number of total interdiction events decreased in FY 2018. The continuing high level of noncommercial maritime flow of cocaine will continue to make meeting the removal rate target very difficult even with high levels of effort provided by the Coast Guard and its partners. In FY 2018, the absence of significant support from flight-deck equipped U.S. Navy vessels, which could have been equipped with available Coast Guard Law Enforcement Detachments (LEDETs), further decreased available

assets dedicated to this mission as compared to previous years with higher removal rates. In FY 2018, the Coast Guard expressly made available a LEDET for every U.S. Navy vessel operating in support of Joint Interagency Task Force (JIATF) operations. Finally, higher mission demands for our National Security Cutters and long-range Maritime Patrol Aircraft whittled away some resource availability in these high-impact platforms.

The Coast Guard Maritime Law Enforcement program managers monitor the cocaine removal rate, watching for both changes in Coast Guard removals, as well as increases or decreases in flow. Any changes are evaluated to determine the cause and to develop strategies and tactics to continue to increase the removal rate. Factors that can impact the Coast Guard's removal rate and total known non-commercial maritime flow include, but are not limited to:

- The production capacity and supply of cocaine generated in source countries by TCOs, including efforts in source countries to eradicate cocaine at its source;
- Continuously changing modes, tactics and routes by TCOs (e.g. use of submersible type vessels and logistic support vessels);
- The advancing age and deteriorating condition of the Coast Guard's cutter fleet;
- The availability of aviation assets from CBP, U.S. Navy (USN) and Allied nations to support Detection and Monitoring in the transit zone;
- The availability of Coast Guard surface assets and USN or Allied surface assets with embarked USCG LEDETs to perform interdiction and apprehension activities;
- The availability, quality and timeliness of tactical intelligence; and new or upgraded diplomatic and legal tools;
- The fielding of new capabilities (e.g. National Security Cutter, Fast Response Cutter, and Maritime Patrol Aircraft).

In addition to the factors listed above, the Coast Guard considers the level of effort it will provide to the drug interdiction mission when setting cocaine removal targets. In FY 2018, the Coast Guard dedicated additional focus and assets to transit zone interdiction operations commensurate with previous levels. The Coast Guard was able to reallocate ship deployments due to a decreased operational demand from other missions, and exceeded its target of 2,160 major cutter days to the transit zone with a total of 2,487 ship days deployed. Coast Guard Maritime Patrol Aircraft (MPA) support to Joint Interagency Task Force South (JIATF-S) was just under the Service's 3,181 hour commitment with 2,984 MPA hours deployed. The coverage loss is attributable to gaps created by unanticipated maintenance. Airborne Use of Force (AUF) helicopter deployed days exceeded the 1,314 day commitment with 1,344 days deployed aboard ship. Coast Guard LEDETs met all requests for deployments.

At least annually, the Coast Guard's Maritime Law Enforcement Program and Deputy Commandant for Operations' Office of Performance Management and Assessment review assumptions that factor into the establishment of out-year cocaine removal targets, making adjustments as necessary. Revisions to the targets are reported via the DHS' Future Year Homeland Security Program (FYHSP) database. The Maritime Law Enforcement Program last updated its out-year performance targets in March 2018 in conjunction with normal target setting timelines.

Due to the large growth in estimated noncommercial maritime cocaine flow in the maritime transit zone from FY 2015 to FY 2017, the Coast Guard's removal rate target for FY 2018 was lowered to 10% and continues into FY 2019. Due to increases in the capabilities provided by new Coast Guard assets and the gradual improvement in intelligence and targeting this is an aggressive, yet achievable performance target.

Quality of Performance Data

The Coast Guard continues to use the CCDB as its source for tracking cocaine movement estimates. The CCDB is the U.S. government's authoritative database for illicit drug movement in the Western Hemisphere. The Coast Guard and other federal government agencies use the CCDB to capture all known and suspected drug movement. During quarterly interagency conferences, CCDB partners develop and reconcile information about the quantity of cocaine flows and removals during drug interdiction operations. CCDB estimates permit the Coast Guard to objectively evaluate its performance.



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Appendix A Report Distribution

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