

Department of Homeland Security **Office of Inspector General**

DHS Home-to-Work Transportation





OFFICE OF INSPECTOR GENERAL

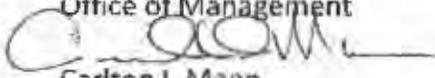
Department of Homeland Security

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

December 20, 2013

MEMORANDUM FOR: **The Honorable Rafael Borrás**
Under Secretary for Management
Office of Management

Michael Karau
Acting Assistant Deputy for Mobile Assets and Personal
Property Program Office
Office of Management

FROM: 
Carlton I. Mann
Chief Operating Officer

SUBJECT: *DHS Home-to-Work Transportation*

Attached for your action is our final report, *DHS Home-to-Work Transportation*. We incorporated the formal comments from the Office of Management in the final report.

The report contains five recommendations aimed at improving DHS' management of the home-to-work transportation program. Your office concurred with all five recommendations. DHS submitted a formal response to the draft report with a management decision for each recommendation and OIG approves of DHS' plan. Based on information provided in your response to the draft report, we consider recommendations 1 through 4 resolved and open, and recommendation 5 is unresolved and open. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions. Please email a signed PDF copy of all responses and closeout requests to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to appropriate 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 Mark Bell, Acting Assistant Inspector General for Audits at (202) 254-4100.

Attachment



Table of Contents

Executive Summary	1
Background	2
Results of Audit	3
Monitoring and Oversight of Home-to-Work Transportation	4
Recommendations	8
Management Comments and OIG Analysis	9

Appendixes

Appendix A: Objectives, Scope, and Methodology	12
Appendix B: Management Comments to the Draft Report	14
Appendix C: Eligibility Type As Reported on Authorization Forms	16
Appendix D: Major Contributors to This Report	17
Appendix E: Report Distribution	18

Abbreviations

CBP	U.S. Customs and Border Protection
CRSO	Chief Readiness Support Officer
DHS	Department of Homeland Security
FEMA	Federal Emergency Management Agency
FMR	Federal Management Regulation
FY	fiscal year
GAO	Government Accountability Office
HtW	home-to-work
ICE	U.S. Immigration and Customs Enforcement
NPPD	National Protection and Programs Directorate
OIG	Office of Inspector General
OCAO	Office of the Chief Administrative Officer
TSA	Transportation Security Administration
U.S.C.	United States Code
USCG	United States Coast Guard
USSS	United States Secret Service



Executive Summary

The Department of Homeland Security (DHS) has one of the largest motor vehicle fleets in the Federal Government, with more than 56,000 vehicles costing approximately \$534 million annually. Home-to-work transportation is the use of government passenger carriers, including motor vehicles, by employees for transportation between their homes and places of work. According to DHS, home-to-work transportation is a flexible and powerful tool for meeting mission requirements and enhancing the overall responsiveness to emergency situations. Our audit objective was to determine whether DHS has implemented appropriate internal controls to ensure that home-to-work transportation is justified and used efficiently.

DHS has attempted to establish policies and procedures to ensure that its use of home-to-work transportation is effective and efficient, that data and reporting are reliable, and that it complies with applicable laws and regulations. However, the Department and the Components we reviewed do not adequately monitor and provide oversight of home-to-work transportation to ensure that the Components are complying with departmental guidance and consistently gathering timely, accurate information on eligibility and authorization, vehicle use, and the number of participants.

The Department does not always ensure that home-to-work transportation applicants comply with eligibility requirements and that use of home-to-work transportation is authorized and justified. It has also not ensured that all Components using home-to-work transportation have complied with the annual reporting requirement in *DHS Manual 112-05-001 Home-to-Work Transportation*. As a result, DHS does not have reliable and accurate data to determine whether participation is justified or to make informed decisions about the use of home-to-work transportation.

We made five recommendations to the Department to implement stronger internal controls, improve guidance on the home-to-work transportation program, and implement a department-wide, centralized data system to track and monitor home-to-work transportation information. The Department concurred with all five recommendations.



Background

DHS has one of the largest motor vehicle fleets in the Federal Government, with more than 56,000 vehicles costing approximately \$534 million annually. The Department’s fleet is composed of government passenger vehicles used for official business to assist in accomplishing the missions of the Department and its Components.

The *DHS Manual 112-05-001 Home-to-Work Transportation* (DHS HtW manual) defines home-to-work (HtW) transportation as the use of government passenger carriers (motor vehicles, aircraft, boats, ships, or other similar means of transportation) to transport employees between their homes and places of work. According to DHS, HtW transportation is a flexible and powerful tool for meeting mission requirements and enhancing the overall responsiveness to emergency situations.

As of May 2013, DHS had more than 17,000 employees authorized to use HtW transportation. Table 1 shows the total number of authorized users of HtW transportation by Component for fiscal year (FY) 2012.

Table 1: FY 2012 Authorized HtW Users by Component

DHS Component	HtW Authorized Users	Total Number of Domestic Employees	Percentage of workforce authorized to use HtW transportation
U.S. Immigration and Customs Enforcement (ICE)	7,938	19,902	40%
U.S. Customs and Border Protection (CBP)	3,081	59,103	5%
United States Secret Service (USSS)	2,791	6,693	42%
Transportation Security Administration (TSA)	2,276	64,312	4%
National Protection and Programs Directorate (NPPD)	972	2,883	34%
United States Coast Guard (USCG)	411	49,585	1%
Federal Emergency Management Agency (FEMA)	3	16,512	<1%
Remaining components with large vehicle fleets and no HtW	0	17,377	0%
Total	17,472	236,367	7%

Source: OIG analysis of data from DHS Office of the Chief Human Capital Officer and Component Headquarters



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Title 31, United States Code (U.S.C.) § 1344 grants each Federal agency head the authority to determine which job positions are eligible to use HtW transportation. The statute authorizes the use of HtW transportation for certain high level officials. It also provides the DHS Secretary with the ability to authorize HtW for employees engaged in: (1) performance of fieldwork; (2) intelligence, counterintelligence, protective services, and criminal law enforcement duties; (3) an emergency; (4) compelling operational consideration; or (5) clear and present danger. DHS has combined some of these eligibility categories. The DHS HtW manual reflects the legal framework by requiring DHS employees to select one of five eligibility categories: (1) legislative; (2) fieldwork; (3) intelligence, counterintelligence, protective services, or criminal law enforcement; (4) highly unusual circumstances; and (5) contingency determinations.

During our audit, the Office of the Chief Administrative Officer (OCAO) was merged with the Office of the Chief Readiness Support Officer (CRSO). DHS' Mobile Assets and Personal Property Program Office, which is under the CRSO, assists Components with fleet management policy and oversight and is charged with ensuring that Components comply with Federal and departmental fleet management and HtW policies, laws, and regulations. In November 2010, the Mobile Assets and Personal Property Program Office issued the DHS HtW manual, which sets forth procedures and requirements for DHS' HtW transportation, including guidance for Components to ensure efficiency and accountability throughout the Department.

Our audit focused on the five DHS Components with the largest fleets and the most employees authorized to use HtW transportation—CBP, ICE, USSS, the USCG, and TSA. See appendix A for our objective, scope, and methodology.

Results of Audit

DHS has attempted to establish policies and procedures to ensure that its use of HtW transportation is effective and efficient, that data and reporting are reliable, and that it complies with applicable laws and regulations. However, the Department and the Components we reviewed do not adequately monitor and provide oversight of HtW transportation to ensure that the Components are complying with its guidance and consistently gathering timely, accurate information on eligibility and authorization, vehicle use, and the number of participants.

The Department does not always ensure that HtW transportation applicants comply with eligibility requirements and that use of HtW transportation is authorized and justified. The Department has not ensured that all Components using HtW transportation have complied with DHS' annual reporting requirement. As a result, DHS



does not have reliable and accurate data to determine whether participation is justified or to make informed decisions about the use of HtW transportation.

Monitoring and Oversight of Home-to-Work Transportation

DHS does not adequately monitor and oversee HtW transportation activities to ensure that the Components comply with its guidance and consistently gather timely, accurate information on vehicle use and HtW participants, including their eligibility and authorization to use HtW transportation. Specifically, the Department does not track HtW users accurately, review authorizations sufficiently, or ensure that reauthorizations are timely. DHS and the Components do not track, monitor, and report HtW transportation-related activities adequately, which may hinder detection of waste and abuse. Although all Components with HtW transportation users are required to report information on the program annually to the OCAO, only two Components have met this requirement. Consequently, the Department does not have accurate information on participant eligibility, vehicle mileage, including mileage associated with commuting and operations, as well as fuel costs.

Tracking and Monitoring HtW-related Information

Neither DHS nor the Components have systems to track and monitor HtW-related data adequately or gather it in a central system. For example, to respond to a request for the total number of HtW users, DHS relied on and provided 2-year-old data; CBP, TSA, and USSS headquarters had to request information from their field offices. CBP and ICE headquarters have fleet information systems, but the field offices cannot access these systems and instead collect HtW use on monthly paper-based logs.

Although DHS Components collect HtW data submitted by individual users, they are not aggregating or verifying the monthly data for all HtW users. According to 40 U.S.C. § 17502, Federal agencies should establish and operate a centralized monitoring system for motor vehicle operations; however, DHS does not have such a system to identify, collect, and analyze the costs of operating and maintaining its vehicle fleet. A centralized system would assist DHS in gathering and maintaining comprehensive and up-to-date information on HtW transportation, in analyzing the activities, and in determining whether the program could be more cost efficient. The absence of such a system hinders the Department and its Components in obtaining and using reliable data for internal and external reporting and in making informed decisions. The Mobile Assets and



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Personal Property Program Office acknowledged the need for Components to track and maintain useful HtW information in an easily accessible data system.

Eligibility and Authorizations

Although the DHS HtW manual describes the eligibility categories, which must be selected for authorizing HtW transportation, the Department is not enforcing compliance. Some Components do not follow the guidance and use component-created eligibility categories, making it more difficult for DHS to determine whether participation is justified according to Federal law. For example, on TSA authorization request forms, employees justified the need for HtW transportation based on the program office in which they work.

Although the DHS HtW manual includes descriptions of who is eligible to use HtW transportation, the manual does not include definitions or examples of the types of positions or duties for its eligibility categories, which may allow ineligible personnel to participate in the program. The manual does not define terms such as intelligence, counterintelligence, protective services, or criminal law enforcement as they relate to the Department's mission. According to the General Services Administration *Bulletin FMR B-35 Motor Vehicle Management*, in their HtW programs, all agencies should consider defining terms such as emergency use, criminal law enforcement, intelligence, and counterintelligence as they relate to the agencies' specific operations.

Once a supervisor has determined that an employee is eligible for HtW transportation, the employee must complete and submit a DHS HtW authorization request for review. In DHS' review process, field office supervisors approve and sign requests for authorization and forward them to Component headquarters officials. Headquarters officials are supposed to combine all field office HtW authorization requests and submit them to OCAO to review and recommend for approval or denial by the Secretary of DHS. OCAO is responsible for ensuring that authorization packages are complete, have sufficient detail, and comply with applicable laws and regulations.

DHS does not ensure that HtW authorization requests are complete and accurate. During our site visits to Component field offices, we identified 25 of 482 employees who were using HtW vehicles when their authorization forms were incomplete and did not comply with DHS guidance—16 forms did not have a supervisor's signature and 9 forms did not include an eligibility category or provide a justification narrative. In addition to the 25, 15 of the 482 employees using HtW transportation did not have an authorization form on file at the time



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

of our review. During our interviews at eight locations, four employees responsible for fleet management said that officers and agents considered the HtW vehicles a perk to their position and reported that they viewed HtW transportation as more of an entitlement. DHS needs to strengthen the guidance in its HtW manual to ensure that each HtW authorization request adequately justifies and supports the need for an HtW vehicle.

DHS has not ensured that Components submit timely requests to reauthorize the use of HtW transportation, and some participants use HtW vehicles even though the HtW authorization expired. We reviewed 482 authorizations and identified 38 that were expired for employees who were using HtW vehicles for either fieldwork or a compelling operational consideration. According to the DHS HtW manual, fieldwork authorizations are limited to 2 years, after which use of HtW must be reauthorized. Compelling operational considerations are effective for not more than 15 calendar days, but can be extended for up to 180 days.

Although DHS allows determinations for employees engaged in intelligence, counterintelligence, protective services, or criminal law enforcement duties to be generally open-ended, the HtW manual recommends that the Department and its Components monitor and oversee HtW transportation to ensure that the vehicle is still needed to meet the mission. We identified 67 law enforcement and 56 intelligence HtW authorizations that were not reviewed in more than 2 years. The HtW manual identifies 2 years as the maximum timeframe for which the eligibility categories should be reviewed. We used this timeframe as a benchmark that should also be applied to law enforcement and intelligence authorizations. However, the manual does not specify the policies and procedures for periodic reauthorization related to law enforcement officials or any other categories for use of HtW transportation. See appendix C for more details.

Data on Vehicle Use

We identified errors and inconsistencies in the Components' HtW data, which hamper the Department's ability to make informed decisions for HtW transportation. Specifically, during our fieldwork, we identified Component field offices that:



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

- Could not provide the actual number of HtW miles driven.
- Could not determine the fuel costs directly related to commuting from home to work.
- Reported different authorized HtW users than were included on lists from their Component headquarters. When comparing the lists of authorized participants from the Component headquarters that we reviewed to the lists provided by the field offices that we visited, we identified 1,288 employees whose names appeared on one list or another, but not on both lists.
- Tracked HtW miles inconsistently. Some employees defined HtW use as any miles driven during their commute between their home and their duty station, whereas other employees defined HtW use as any miles driven in their HtW vehicle.
- Applied inconsistent definitions and circumstances for recording call-outs. Call-outs, commonly defined as responses to emergency situations, are a primary justification for law enforcement officers to use HtW transportation.

Some Components had employees who commuted more than the established 50-mile limit each way at the seven locations we visited. According to the DHS HtW manual, HtW transportation cannot exceed 50 miles each way from residence to duty station, unless the OCAO grants a waiver. We verified the distance between 473 employees' recorded home address and the duty station address and identified 19 employees who were non-compliant with the 50-mile limit and did not have an approved waiver. One employee at a field office commuted as far as 164 miles each way. In its annual HtW report to DHS, NPPD reported 64 employees who were not in compliance with the 50-mile limit and did not have a waiver on file. As of August 2013, DHS had not taken action to address NPPD's reported noncompliance.

Annual Reporting Requirement

The Department has not ensured that all Components using HtW transportation have complied with its annual reporting requirement. According to the DHS HtW manual, by December 31 of each year, all Components must submit to OCAO a comparison of the HtW transportation costs proposed in the original request for authorization to those actually incurred, when the actual costs exceed the original projection. At a minimum, these cost comparisons must include



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

maintenance, fuel, and repairs; and a "Statement of Assurance" that the Component is meeting all statutory requirements of the program.

Only CBP and NPPD submitted the 2012 annual HtW transportation report, and neither submission included a comparison between proposed and actual costs because neither had the necessary information to compare costs. According to CBP's annual report, its data collection process does not have the fidelity to meet the annual reporting requirement. CBP intends to improve the data currently stored and entered into its HtW tracking system, in an effort aimed at validating and correcting vehicle inventory data and HtW reporting. As of August 2013, the Mobile Assets and Personal Property Program Office had not requested these required reports from any other Components, nor had it requested the missing cost information in the submitted reports.

Conclusion

DHS has not implemented all the necessary internal controls for the use of HtW transportation, and it does not have reliable and accurate data to determine whether participation is justified or to make informed decisions about the use of HtW transportation. With more than 17,000 employees using government-provided vehicles, the Department needs to improve the reliability of program data so that it can thoroughly assess all HtW transportation-related activities to ensure that only eligible employees who meet its policy requirements are participating in the HtW program.

Recommendations

We recommend that the Under Secretary for Management:

Recommendation #1:

Strengthen the *DHS Manual 112-05-001 Home-to-Work Transportation* with clear definitions and guidelines for eligibility to participate and establishing guidance for periodic reauthorization of all approved home-to-work authorizations.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Recommendation #2:

Implement policies to ensure Components collect reliable information necessary to track, monitor, analyze, and report on home-to-work transportation use and costs.

Recommendation #3:

Enforce the *DHS Manual 112-05-001 Home-to-Work Transportation* annual reporting requirement.

Recommendation #4:

Perform a thorough assessment of the home-to-work transportation program annually to validate the accuracy and completeness of the information reported, Component monitoring efforts, compliance with DHS guidance, and home-to-work transportation participant eligibility.

Recommendation #5:

Implement a centralized, department-wide, home-to-work data system, accessible by headquarters and Component personnel, to collect, track, and monitor home-to-work transportation-related information, such as authorizations, costs, vehicle use, and number of users.

Management Comments and OIG Analysis

DHS provided formal comments to our report. A copy of the response in its entirety is included as appendix B. DHS also provided a separate document with technical comments and suggested revisions to our report. We reviewed the technical comments and made minor changes in the report when appropriate. DHS concurred with all five of our recommendations. A summary of the responses and our analysis of those responses follow.

Response to Recommendation #1: DHS concurred. The CRSO will work with Component operations to strengthen the HtW manual and clarify definitions and guidelines for eligibility to participate. DHS will also establish guidance for periodic renewal of all approved HtW authorizations. The estimated completion date is June 30, 2014.



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

OIG Analysis: DHS' planned corrective actions are responsive to the recommendation. This recommendation will remain resolved and open until we receive documented support that DHS has strengthened the HtW manual and established guidance for periodic HtW reauthorizations.

Response to Recommendation #2: DHS concurred. The CRSO plans to develop a data dictionary to specify each data element that must be included to document HtW use. The CRSO will also edit the HtW manual to include implementation guidance on the collecting and reporting of data and will issue a standard mileage log for use in the field. The estimated completion date is September 30, 2014.

OIG Analysis: DHS' planned corrective actions are responsive to the recommendation. This recommendation will remain resolved and open until we receive documented support that DHS has edited the HtW manual to include implementation guidance on collecting and reporting HtW data. We will also need to verify that DHS has developed and issued a data dictionary and a standard mileage log.

Response to Recommendation #3: DHS concurred. The CRSO will continue to encourage Components to comply with the reporting requirements by sending reminders of their responsibilities and offering support in meeting and understanding requirements. A certification requirement for the Component Head will be added to the requirement starting with the 2014 annual report. The estimated completion date is September 30, 2014.

OIG Analysis: DHS' planned corrective actions are responsive to the recommendation. OIG understands that the CRSO has oversight responsibility but limited authority to enforce Components' compliance with the annual reporting requirement. This recommendation will remain resolved and open until we receive documented support that DHS is fulfilling its oversight responsibility to encourage the Components to comply with the annual HtW reporting requirement.

Response to Recommendation #4: DHS concurred. The CRSO will institute an annual review of Component HtW programs and documentation supporting all approved HtW requests. The estimated completion date is September 30, 2014.

OIG Analysis: DHS' planned corrective actions are responsive to the recommendation. This recommendation will remain resolved and open until we receive documented support that DHS has instituted an annual review of



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Component HtW programs and documentation supporting all approved HtW requests.

Response to Recommendation #5: DHS concurred and within the next 180 days, the CRSO will explore options for developing or acquiring a department-wide HtW data system. DHS plans to develop an implementation schedule if a viable option exists. The estimated completion date is to be determined.

OIG Analysis: DHS's planned corrective actions seem responsive to the recommendation. The recommendation will remain unresolved and open until we receive documented support on how DHS plans to implement a centralized, department-wide HtW data system.



Appendix A

Objectives, Scope, and Methodology

The Department of Homeland Security (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.

This report provides the results of our work to determine whether DHS has implemented appropriate internal controls to ensure the use of HtW transportation is justified and used efficiently. To achieve our objectives, we interviewed DHS officials and Component personnel from the Mobile Assets and Personal Property Program Office, CBP, ICE, TSA, USSS, and the USCG.

We reviewed policies and procedures related to HtW transportation including 31 U.S.C. § 1344, *Passenger Carrier Use*, which grants the agency head authority to determine HtW eligibility, 41 CFR Part 102-5 covering HtW transportation, the General Services Administration *Bulletin FMR B-35 Motor Vehicle Management* on HtW transportation, the *DHS Manual 112-05-001 Home-to-Work Transportation*, and fleet management handbooks of the various Components we reviewed.

We met with officials at eight locations to review the HtW activities. In Washington, DC, we met with officials at DHS' Mobile Assets and Personal Property Program Office, which is under the CRSO and assists Components with fleet management policy and oversight. We conducted fieldwork testing at the five DHS Components with the largest fleets—CBP, ICE, USSS, the USCG, and TSA—at the following seven locations: Boston, MA; San Diego, Los Angeles, and Long Beach, CA; Tucson and Phoenix, AZ; and Chicago, IL. We selected site visit locations based on the following criteria: field offices with the largest fleets; field offices reporting the largest participation in HtW transportation; locations with multiple co-located Component offices (CBP, ICE, USSS, the USCG, and TSA); and Component offices near OIG offices to save travel funds. We excluded OIG to meet the generally accepted government auditing standards conceptual framework approach to independence.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

During site visits—

- We collected HtW authorizations to verify whether the employees were authorized to use HtW vehicles;
- We reviewed vehicle log records to determine whether HtW and operational mileage, response to emergencies, and monthly mileage readings were documented; and
- We completed a vehicle verification form for all HtW officers and agents we interviewed to determine where they reported daily on their duties and how often they used their HtW vehicle. We also inspected their vehicles to verify the accuracy of headquarters and local vehicle inventory files. We verified the vehicle identification number in the headquarters and local fleet inventories to ensure that both offices were tracking HtW vehicle use.

We interviewed field supervisors and users with oversight responsibility for HtW vehicles and reviewed vehicle inventories, vehicle usage logs, and HtW authorizations. We mapped the distance from duty station to residence for all HtW users we interviewed to determine if they were complying with the DHS HtW manual's 50-mile commuting limit. Because of limited audit resources, we relied on Component self-reporting and did not perform data reliability tests on the data we received from the DHS Components pertaining to their HtW fleet inventories, number of approved HtW users, or vehicle log records.

We conducted this performance audit between November 2012 and June 2013 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. 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 believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Appendix B
Management Comments to the Draft Report

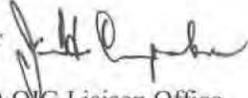
U.S. Department of Homeland Security
Washington, DC 20528



Homeland
Security

November 13, 2013

MEMORANDUM FOR: Charles K. Edwards
Deputy Inspector General
Office of Inspector General

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

SUBJECT: OIG Draft Report: "DHS Home to Work Transportation" (Project
No. 13-016-AUD-MGMT)

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

DHS recognizes the importance of managing its resources to effectively deliver its mission. The Department established policy and related procedures and requirements for the Home to Work (HtW) transportation program with the issuance of the DHS HtW Manual in November 2010. The HtW Manual includes guidance establishing and maintaining Component-specific programs to ensure HtW efficiency and accountability throughout the Department.

The draft report contained five recommendations with which the Department concurs. Specifically, OIG recommended that the Under Secretary for Management:

Recommendation 1: Strengthen the *DHS Manual 112-05-001 Home-to-Work Transportation* with clear definitions and guidelines for eligibility to participate and establishing guidance for periodic reauthorization of all approved HtW authorizations.

Response: Concur. The DHS Chief Readiness Support Officer (CRSO) will work with Component operations to strengthen the manual, clarifying definitions and guidelines for eligibility to participate. This work will include objective criteria for eligibility for each of the HtW categories: fieldwork, intelligence, counterintelligence, protective services, criminal law enforcement, highly unusual circumstances, and contingency determinations. Guidance will also be established for periodic renewal of all approved HtW authorizations. We anticipate revising and reissuing the manual within approximately 180 days. Estimated Completion Date (ECD): June 30, 2014.

Recommendation 2: Implement policies to ensure Components collect reliable information necessary to track, monitor, and analyze, and report on home-to-work transportation use and costs.



OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Response: Concur. The DHS CRSO will develop a data dictionary and specify each data element that must be included to document HtW. The HtW Manual will be edited to include implementation guidance relative to collection and reporting of data, including responsibilities for data capture, consolidation, and monitoring. These steps should improve the understanding of the data required and the quality of the data captured. A standard mileage log with mileage recorded by employee, certified by supervisor and forwarded to local fleet manager for data entry on a periodic (monthly) basis will be issued for implementation. The daily log will include a reminder of the employee's ethics responsibilities and potential consequences for failing to meet expected standards in the footer. ECD: September 30, 2014.

Recommendation 3: Enforce the *DHS Manual 112-05-001 Home-to-Work Transportation* annual reporting requirement.

Response: Concur. The DHS CRSO will continue to encourage Components to comply with reporting requirements established in December 2008 in Management Directive 112-05, *Home to Work Transportation Programs*. Strategies to encourage Component compliance include frequent reminders of their responsibilities, offers of support in meeting and understanding requirements, and meeting with Component management and/or other operations upon which the Component fleet managers rely for data and compliance. A certification requirement for the Component Head will be added to the requirement starting with the 2014 annual report. ECD: September 30, 2014.

Recommendation 4: Perform a thorough assessment of the home-to-work transportation program annually to validate the accuracy and completeness of the information reported, component monitoring efforts, compliance with DHS guidance, and HtW transportation participant eligibility.

Response: Concur. The DHS CRSO will continue efforts to monitor data submitted by Components for compliance. This will include instituting an annual review of Component HtW programs and documentation supporting all approved requests. CRSO will assess the Component HtW programs in conjunction with its broader assessment of support services programs in 2014. ECD: September 30, 2014.

Recommendation 5: Implement a centralized, department-wide, home-to-work data system, accessible by headquarters and component personnel, to collect, track, and monitor home-to-work transportation-related information, such as authorizations, costs, vehicle use, and number of users.

Response: Concur. The DHS CRSO will explore options for development or acquisition of a DHS-wide, HtW data system with a goal of developing requirements within the next 180 days. Specific findings and an implementation schedule will then be developed if a viable option is identified and given the availability of budgetary resources. Should resource constraints or other concerns preclude development of a DHS-wide system; alternatives will be identified to meet the intent of OIG's recommendations. ECD: To Be Determined

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 should you have any questions. We look forward to working with you in the future.



Appendix C

Eligibility Type As Reported on Authorization Forms

Eligibility Category Reported by Component	Duration	Authorizations Reviewed	Expired or No Evidence of Review in more than 2 years
Legislative (Senior Level Officials)	Unlimited	0	N/A
Intelligence	Generally open-ended	77	56
Law Enforcement	Not listed as one of the five types of eligibility, used duration for intelligence.	172	67
Highly Unusual Circumstances	15 calendar days with two 90-day extensions	0	0
Fieldwork	2 years	100	9
Compelling Operational Consideration	Not listed as one of the five types of eligibility, used duration for Highly Unusual Circumstances.	36	29
Emergency	Not listed as one of the five types of eligibility, used the maximum duration of 2 years.	6	0
Contingency Determinations	Limited duration	0	0
No Authorization on File	Could not determine	15	15
No, Multiple, or Component-Created Eligibility Selections	Could not determine	76	N/A
Totals		482	176

Source: DHS OIG Analysis of Authorizations



Appendix D

Major Contributors to This Report

Patrick O'Malley, Director
Shelley Howes, Audit Manager
Lindsey Koch, Auditor-in-Charge
Sandra Ward-Greer, Auditor
Frank Lucas, Auditor
Tom Hamlin, Program Analyst
Kelly Herberger, Communications Analyst
Ralleisha Dean, Independent Referencer



Appendix E

Report Distribution

Department of Homeland Security

Secretary
Deputy Secretary
Chief of Staff
Deputy Chief of Staff
Chief Administrative Officer
General Counsel
Executive Secretary
Under Secretary for Management
Director, GAO/OIG Liaison Office
Assistant Secretary for Office of Policy
Assistant Secretary for Office of Public Affairs
Assistant Secretary for Office of Legislative Affairs
Mobile Assets and Personal Property Program Office
Component Liaison, U.S. Customs and Border Protection
Component Liaison, U.S. Immigration and Customs Enforcement
Component Liaison, United States Secret Service
Component Liaison, United States Coast Guard
Component Liaison, Transportation Security Administration
Chief Privacy Officer

Office of Management and Budget

Chief, Homeland Security Branch
DHS OIG Budget Examiner

Congress

Congressional Oversight and Appropriations Committees, as appropriate

ADDITIONAL INFORMATION AND COPIES

To obtain additional copies of this document, please call us at (202) 254-4100, fax your request to (202) 254-4305, or e-mail your request to our Office of Inspector General (OIG) Office of Public Affairs at: DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

For additional information, visit our website at: www.oig.dhs.gov, or follow us on Twitter at: [@dhsoig](https://twitter.com/dhsoig).

OIG HOTLINE

To expedite the reporting of alleged fraud, waste, abuse or mismanagement, or any other kinds of criminal or noncriminal misconduct relative to Department of Homeland Security (DHS) programs and operations, please visit our website at www.oig.dhs.gov and click on the red tab titled "Hotline" to report. You will be directed to complete and submit an automated DHS OIG Investigative Referral Submission Form. Submission through our website ensures that your complaint will be promptly received and reviewed by DHS OIG.

Should you be unable to access our website, you may submit your complaint in writing to:

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

You may also call 1(800) 323-8603 or fax the complaint directly to us at (202) 254-4297.

The OIG seeks to protect the identity of each writer and caller.