

U.S. DEPARTMENT OF HOMELAND SECURITY OFFICE OF INSPECTOR GENERAL

OIG-25-17

February 19, 2025

FINAL REPORT

The Coast Guard Faces Challenges Interdicting Non-Commercial Vessels Smuggling Drugs into the United States





OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

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

February	19,	2025
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MEMORANDUM FOR:	Admiral Kevin E. Lunday Senior Official Performing the Duties of the Commandant U.S. Coast Guard		
FROM:	Joseph V. Cuffari, Ph.D. Inspector General	JOSEPH V CUFFARI	Digitally signed by JOSEPH V CUFFARI Date: 2025.02.19 14:13:48 -07'00'
SUBJECT:	The Coast Guard Faces Ch Vessels Smuggling Drugs	•	0

Attached for your action is our final report, *The Coast Guard Faces Challenges Interdicting Non-Commercial Vessels Smuggling Drugs into the United States*. We incorporated the formal comments provided by your office.

The report contains four recommendations aimed at improving the Coast Guard's ability to interdict non-commercial vessels smuggling drugs into the United States. Your office concurred with three recommendations. Based on information provided in your response to the draft report, we consider recommendation 1 open and unresolved. As prescribed by Department of Homeland Security Directive 077-01, *Follow-Up and Resolutions for the Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for the recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation. Until your response is received and evaluated, the recommendation will be considered open and unresolved.

Based on information provided in your response to the draft report, we consider recommendations 2 through 4 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts.

Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

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

Please contact me with any questions, or your staff may contact Kristen Bernard, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

The Coast Guard Faces Challenges Interdicting Non-Commercial Vessels Smuggling Drugs into the United States

February 19, 2025

Why We Did This Audit

Drug trafficking from overseas sources threatens the security of the United States. The Coast Guard is responsible for interdicting and apprehending persons and vessels suspected of drug trafficking in the maritime environment. The Coast Guard's counterdrug mission aims to reduce the supply of illicit substances in the United States by disrupting the flow of cocaine and other illegal drugs. We conducted this audit to determine to what extent the Coast Guard interdicts non-commercial vessels smuggling drugs into the United States.

What We Recommend

We made four recommendations to improve the Coast Guard's efforts to interdict non-commercial vessels smuggling drugs into the United States.

For Further Information: Contact our Office of Public Affairs at (202) 981-6000, or email us at: <u>DHS-OIG.OfficePublicAffairs@oig.dhs.gov</u>.

What We Found

The United States Coast Guard (Coast Guard) was not able to consistently interdict non-commercial vessels smuggling drugs into the United States. From fiscal years 2021 through 2023, the Coast Guard interdicted an estimated 421.9 metric tons of cocaine but fell short of its total cocaine removal goal of 690 metric tons. This occurred, in part, because the Coast Guard did not always have cutters available to perform the counterdrug mission and did not have a contingency plan to address the cutters' unavailability. We found Coast Guard cutters were unavailable for 2,058 cumulative days over a 3-year period. Using the Coast Guard's formula, we calculated that the Coast Guard could have interdicted an additional 57 to 89.1 metric tons of cocaine had these cutters been performing the counterdrug mission.

Additionally, the Coast Guard did not accurately record all drug interdictions in its system of record. From FYs 2021 through 2023, 156 of the 271 (58 percent) counterdrug casefiles in our statistical sample did not contain seizure results, and 185 of 271 (68 percent) did not contain required documentation. This occurred because Coast Guard commanding officers and district personnel did not consistently conduct supervisory reviews to ensure information was accurately captured. Lastly, the Coast Guard made limited progress transitioning its Digital Evidence Search and Seizure program from the pilot program to a mission requirement because it did not conduct an analysis to determine what is needed for the program.

Without addressing these issues, the Coast Guard may be missing opportunities to stop the illicit flow of drugs coming into the United States.

Coast Guard Response

The Coast Guard did not concur with recommendation 1, but concurred with recommendations 2, 3, and 4. Appendix B contains the Coast Guard's management comments in their entirety.



OFFICE OF INSPECTOR GENERAL U.S. Department of Homeland Security

Background

Drug trafficking from overseas sources threatens the security of the United States. The United States has 95,000 miles of coastal waters and more than 300 ports handling passenger and cargo movements, providing ample opportunities for bad actors to smuggle illegal drugs into the country. According to United States Coast Guard (Coast Guard) officials, the total known non-commercial maritime cocaine flow from fiscal years 2021 through 2023 was 7,924 metric tons. See Table 1 for a breakdown of known non-commercial maritime cocaine flow.

Table 1. FY 2021–2023 Known Non-Commercial Maritime Cocaine Flow

Fiscal Year	Metric Tons of Cocaine
2021	2,483
2022	2,848
2023	2,593
Total	7,924

Source: DHS OIG analysis of Coast Guard data

Most of these drugs are carried by non-commercial vessels¹ such as small "go-fast" vessels (see Figure 1), semisubmersible vessels, fishing vessels, and sailing vessels through the Maritime Transit Zone.² This trade in illicit drugs poses a significant threat to our national security and helps fund transnational criminal organizations.

Figure 1. Go-Fast Vessel Interdicted by the United States Coast Guard



Source: Photo from a Coast Guard press release

¹ "Non-commercial vessel" means any seagoing vessel whose primary use is not the commercial transportation of passengers or freight, fishing, or dredging.

² The Maritime Transit Zone is a 6 million square mile transit zone between the United States and drugproducing countries. This area includes the Caribbean Sea, the Gulf of Mexico, and the Eastern Pacific. We note that, after OIG's period of review for this audit ended, Executive Order 14172, *Restoring Names that Honor American Greatness*, directed the renaming of the Gulf of Mexico to the "Gulf of America." See Exec. Order 14172 at Section 4(b) (January 20, 2025).



Within the Department of Homeland Security, the Coast Guard enforces all applicable Federal laws on the high seas subject to the jurisdiction of the United States,³ including interdicting and apprehending persons and vessels suspected of drug trafficking. The Coast Guard's counterdrug mission aims to reduce the supply of illicit substances in the United States by disrupting the flow of cocaine and other illegal drugs.⁴

According to Coast Guard officials, the Coast Guard primarily focuses its interdiction efforts on cocaine because it is the most profitable and primary drug smuggled throughout the Maritime Transit Zone and the smuggling funds a range of transnational criminal organization activities. At-sea interdictions of cocaine are the most effective way to limit transnational criminal organizations from trafficking their entire spectrum of illicit products. The Coast Guard leverages a fleet **Figure 2. Cocaine Interdicted by the Coast Guard**

The Coast Guard leverages a fleet of cutters and boats, maritime patrol aircrafts, and helicopters, as well as international and domestic partnerships in a layered approach to interdict bulk quantities of drugs at sea. The Coast Guard also deploys Law Enforcement Detachments⁵ on U.S. Navy and allied ships. Figure 2 depicts more than 12,100 pounds of cocaine worth more than \$160 million that was interdicted in September 2023.



Source: Photo from Coast Guard press release

The Coast Guard uses the Marine Information for Safety and Law Enforcement (MISLE) system to record the results of at-sea interdictions, including the total drugs seized and any supporting documentation. MISLE is the Coast Guard's comprehensive law enforcement case management system for evaluating the effectiveness of operations and the use of Coast Guard resources.

Intelligence collected during at-sea interdictions offers insight into transnational criminal organization networks. The Coast Guard's Digital Evidence Search and Seizure (DESS) program enables trained DESS operators and boarding officers to conduct imaging and at-

³ 14 U.S.C. § 102.

⁴ The Coast Guard works directly with the Department of Defense's Joint Interagency Task Force – South on its counterdrug mission. The joint task force consists of the U.S. Military, 13 U.S. interagency partners, research and academia, and foreign partners working to detect and monitor illegal drug shipments in the Maritime Transit Zone.

⁵ Law Enforcement Detachments are deployable specialized forces that enforce U.S. laws and treaties in the maritime domain. They deploy on U.S. Navy and Allied ships that transit a counter drug area to provide federal maritime law enforcement capability not otherwise available to the ship.



sea searches of certain electronic devices, such as cellular phones, radios, thumb drives, computers, global positioning systems, electronic navigation systems, and encryption devices. These devices search for intelligence, such as drop off locations, call records, or phone numbers to further the investigation. Decisionmakers then use these time-sensitive DESS search results to determine where best to place resources for operational needs. According to Coast Guard officials, from FYs 2021 through 2023, the DESS program led to the seizure of 13,541 kilograms of its total cocaine seized.

We conducted this audit to determine to what extent the Coast Guard interdicts non-commercial vessels smuggling drugs into the United States.

Results of Audit

The Coast Guard Did Not Meet Its Cocaine Removal Goals for Non-Commercial Vessels Smuggling Drugs into the United States from FY 2021 to FY 2023

The Coast Guard fell short of its performance goals for drug seizures between FYs 2021 and 2023. The Coast Guard assesses the overall effectiveness of its counterdrug mission using two performance goals: 1) the removal rate of cocaine from non-commercial vessels in the Maritime Transit Zone and 2) metric tons of cocaine removed. The Coast Guard regularly reviews its performance and sets goals annually based on historical information, observed trends, intelligence products, changes in each mission area, and changes to the budget impacting mission performance. The cocaine removal rate measures the percentage of documented non-commercial maritime cocaine flow removed by the Coast Guard. The metric tons of cocaine removed is the sum of all cocaine that is removed by Coast Guard personnel and all cocaine lost by transnational criminal organizations due to the Coast Guard's actions.

For FYs 2021 and 2022, the Coast Guard set goals of a 10 percent cocaine removal rate and 240 metric tons of cocaine removed.⁶ In FY 2023, after conducting an analysis of forecasted cocaine flow using 10 years of historical data, the Coast Guard lowered its goals to a 7.5 percent cocaine removal rate and 210 metric tons of cocaine removed.⁷

Based on our review of data from the Department of Defense Consolidated Counterdrug Database, the Coast Guard did not meet its cocaine removal goals for FYs 2021 through 2023 even after reducing its goals by 2.5 percent and 30 metric tons. The Coast Guard removed a total of 421.9 metric tons of cocaine across this 3-year period, falling short of the combined cocaine removal goal of 690 metric tons. The amount removed decreased each year to

⁶ Coast Guard's *FY 2019-2024 Future Year Homeland Security Program Performance Targets*.

⁷ Coast Guard's *FY 2023-2024 Strategic Planning Direction*, July 30, 2022.



approximately 96.2 metric tons in FY 2023 — 113.8 metric tons short of the Coast Guard's reduced goal of 210 metric tons that year. This resulted in a 3.71 percent cocaine removal rate,⁸ which was less than half of the reduced goal of 7.5 percent. See Figure 3 for the difference between the Coast Guard's established targets for its cocaine removal goal and its actual performance.

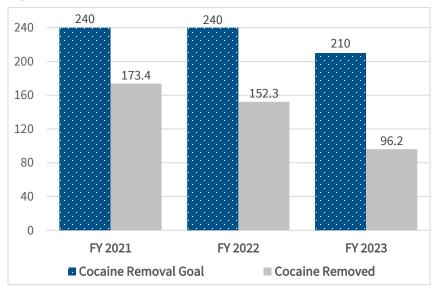


Figure 3. FY 2021–2023 Metric Tons of Cocaine Removed

We found that the Coast Guard did not meet its goals because it did not always have cutters available to perform the counterdrug mission. The Coast Guard relies on its National Security cutters, Medium endurance cutters, and Fast Response cutters to conduct counterdrug operations. As of September 2023, the Coast Guard had 90 different cutters available within these classes. However, 39 of the Coast Guard cutters assigned to the counterdrug mission missed a cumulative 2,058 days from FYs 2021 through 2023 because they were reallocated to the Coast Guard's migrant interdiction mission, had unscheduled maintenance, or were not operable due to COVID-19 protocols. The number of days the cutters were unavailable increased each year from FYs 2021 to 2023, which directly correlates with the decrease in cocaine removals for those years. See Table 2 for a breakdown of the number of unavailable days by reason.

Source: DHS Office of Inspector General analysis of data from the Department of Defense Consolidated Counterdrug Database

⁸ The cocaine removal rate for FY 2023 was calculated by dividing the 96.2 metric tons of cocaine removed by the total known non-commercial maritime cocaine flow of 2,593 metric tons.



Reason for Cutter Unavailability	FY 2021	FY 2022	FY 2023	Total
Migrant Interdiction	31	158	432	621
Unscheduled Maintenance	357	320	625	1,302
COVID-19 Protocols	24	111	-	135
Total Unavailable Days	412	589	1,057	2,058

Table 2. FY 2021–2023 Coast Guard Cutter Unavailability Days

Source: DHS OIG analysis of Coast Guard cutter availability information

According to Coast Guard personnel, many of the cutters scheduled for the counterdrug mission were reassigned to the migrant crisis, thus reducing the number of cutters available in the maritime transit zone, and negatively impacting cocaine removals. Coast Guard personnel also attributed these issues to deferred maintenance. Coast Guard personnel said that insufficient funding for maintenance and repairs has reduced cutter availability, and that the more maintenance periods that are deferred in the short term, the more downtime is needed for maintenance and repair in the long term. Coast Guard personnel also stated that more cutters would help to meet its counterdrug goal. The U.S. Government Accountability Office previously reported on asset challenges impacting Coast Guard's law enforcement mission, which includes its counterdrug efforts.⁹

Further, in FY 2021 cutters faced a 14-day restriction of movement every time COVID-19 protocols were triggered. These protocols included precautions to prevent outbreaks among the cutter crews, impacting cutter availability. In FY 2022, cutter deployments were no longer reduced by restriction of movement periods, but quarantine or isolation requirements rendered some units unavailable.

Lastly, we found that the Coast Guard did not have a contingency plan to improve availability of cutters. A contingency plan would address asset availability issues, such as the risks to the counterdrug mission, the impacts of those risks, triggers for plan activation, response procedures, team member responsibilities, and communication protocols. According to Coast Guard officials, a contingency plan was not necessary because they rely on the Global Force Management process to make decisions. The Global Force Management process includes asset planning across the Coast Guard's missions and includes a strategic review, which identifies specific areas where risks exist and highlights contingency plans for those areas. However, we determined the Global Force Management process does not identify asset availability for its counterdrug mission.

⁹ *Asset, Workforce, and Technology Challenges Continue to Affect Law Enforcement Missions*, GAO-24-107144, November 2023.



Using the Coast Guard's formula, we estimated that the Coast Guard missed opportunities to interdict 57 to 89.1 metric tons of additional cocaine from FYs 2021 through 2023,¹⁰ amounts that would have helped the Coast Guard better meet its drug interdiction goals. See Table 3 for a breakdown of estimated cocaine missed by fiscal year.

Table 3. FY 2021–2023 Estimates of Missed Drug Interdictions

Missed Drug Estimates	FY 2021	FY 2022	FY 2023	Total
Low Estimate (Metric Tons)	6	14.3	36.7	57
High Estimate (Metric Tons)	7.7	29.8	51.6	89.1

Source: DHS OIG analysis of Coast Guard data

The Coast Guard Did Not Accurately Capture Drug Interdictions in MISLE

According to *the U.S. Coast Guard Maritime Law Enforcement Manual (COMDTINST M16247.1H)*, dated November 20, 2020, a law enforcement action is incomplete until it is properly reported and documented. Additionally, per the *MISLE Boarding User Guide*, dated March 23, 2020, whenever the Coast Guard finds a violation or discrepancy after boarding a vessel, Coast Guard personnel must scan and attach all supporting documentation from the boarding in MISLE. This documentation includes the Report of Boarding, Form CG-4100, which documents the results of the law enforcement action taken, including any violations and arrests, and a written summary of the boarding results.

We found the Coast Guard did not accurately document the results of all counterdrug interdictions or upload required supporting documents into MISLE. We reviewed a statistical sample of 271 out of 918 counterdrug casefiles within the MISLE system for FYs 2021 through 2023 and identified that 156 of 271 (58 percent) were missing required information, such as the types and amounts of seized drugs. Moreover, 185 of the 271 (68 percent) did not contain the required Report of Boarding, Form CG-4100. Based on this analysis of our statistical sample, we estimate with 95 percent confidence that between 50.1 percent and 65.1 percent of the total counterdrug casefiles in MISLE did not include the results of the interdiction and that between 61.2 percent and 75.3 percent of the casefiles did not contain supporting documentation from the boarding.

This occurred because Coast Guard commanding officers and district personnel did not perform reviews to ensure all interdiction information was accurately captured and

¹⁰ The Coast Guard uses a formula to calculate the potential cocaine lost due to non–mission-capable days. We used this formula to calculate estimates for the total cocaine lost due to cutter unavailability for FYs 2021 through 2023.



supporting documentation was included in casefiles. We identified that 239 of the 271 (88 percent) counterdrug casefiles were not reviewed by commanding officers. Also, 241 of the 271 (89 percent) were not reviewed at the district level. According to Coast Guard officials, MISLE does not prevent cases from being closed without reviews by commanding officers and district personnel. This allows the Coast Guard to close a law enforcement case in the MISLE system without verifying that the results are accurately recorded.

Consequently, the Coast Guard may be using inaccurate information to evaluate the effectiveness of its operations and make current and future strategic or tactical decisions. Basing decisions on inaccurate information could, in turn, hurt the Coast Guard's ability to interdict drugs and respond to the evolving threats presented by transnational criminal organization drug smuggling.

The Coast Guard Did Not Identify or Acquire the Resources Needed to Implement Its Digital Evidence Search and Seizure Program

The Coast Guard piloted the DESS program to enhance the timeliness and access of electronic-derived intelligence gathered from boardings. On July 18, 2023, the Coast Guard issued the *Digital Evidence Search and Seizure Maritime Law Enforcement/Intelligence Mission Needs Memorandum*, transitioning DESS from a pilot program to a mission requirement. According to the memorandum, every Coast Guard cutter and Law Enforcement Detachment deployed to the Maritime Transit Zone must have a DESS kit¹¹ on board. The program must also have access to a pool of certified operators, and DESS-derived data must be housed in a centralized data storage system that allows Coast Guard intelligence entities to store and access it for further coordination.

The Coast Guard made limited progress transitioning DESS from the pilot program to a mission requirement. As of September 26, 2023, the Coast Guard had 90 cutters available to conduct the counterdrug mission.¹² Yet, in FY 2024, the Coast Guard had just 10 available DESS kits to collect intelligence during at-sea interdictions. According to Coast Guard officials, they leveraged the DESS mission needs memorandum outlining required patrol coverage for the program to determine that the kits were sufficient to support collection efforts. However, the Coast Guard could not demonstrate how it determined the DESS patrol coverage or number of required DESS kits.

¹¹ DESS kits include digital forensic tools, commercial-off-the-shelf equipment, and enterprise-level software that supports collection, analysis, and storage methods to extract and examine digital copies of information obtained from electronic devices.

¹² The count of 90 cutters does not include U.S. Navy or allied nation vessels available for Law Enforcement Detachment teams to deploy on.



Although Coast Guard officials did not have support to justify the ideal number of DESStrained personnel, they believed an allocation of 25 seats for training per year would be ideal to account for turnover and potential staff movement. However, from FYs 2021 through 2023, the Coast Guard only trained 48 people to use the DESS kits. There should have been at least 75 trained personnel between those fiscal years based on the Coast Guard's assumption for the number needed. Moreover, the Coast Guard continues to track program statistics using several spreadsheets from the pilot phase and has not established a formal databased to track DESS data.

This occurred because the Coast Guard has not conducted an analysis of the DESS program to determine what is required to support its implementation. For example, the Coast Guard has not identified the number of DESS kits needed to ensure that all cutters deployed to the Maritime Transit Zone are equipped with a DESS kit, as required. Additionally, the Coast Guard did not identify the number of certified operators needed to fully implement the DESS program. Lastly, Coast Guard officials said they rely on feedback from interagency partners instead of program evaluations to determine the program's capabilities.

As a result, the Coast Guard may be missing interdiction opportunities. In fact, the Coast Guard reported that it was unable to search 112 confiscated devices during the pilot program due to the lack of DESS kits or trained operators. The inability to search these devices caused the Coast Guard to miss potential intelligence collection opportunities.

Conclusion

Transnational criminal organizations are expected to continue smuggling cocaine through the Maritime Transit Zone at historically high levels. Without addressing the issues identified in this report, the Coast Guard may be missing opportunities to meet target goals of removing cocaine and reducing the illicit flow of drugs coming into the country.

Recommendations

Recommendation 1: We recommend the Commandant of the Coast Guard develop and implement a drug interdiction contingency plan to prioritize the availability of cutters for drug interdiction missions and to mitigate the risk of cutters being unavailable.

Recommendation 2: We recommend the Commandant of the Coast Guard update the Marine Information for Safety and Law Enforcement system to require commanding officer and district-level reviews to ensure data accuracy within the system.

Recommendation 3: We recommend the Commandant of the Coast Guard conduct a needs assessment for the Digital Evidence Search and Seizure program, including the number of kits



and trained personnel needed to ensure the program's success in gathering intelligence while at sea.

Recommendation 4: We recommend the Commandant of the Coast Guard identify and implement a centralized database to capture, analyze, and report on information related to the Coast Guard's Digital Evidence Search and Seizure program's success.

Management Comments and OIG Analysis

The Coast Guard provided management comments on a draft of this report. We included the comments in their entirety in Appendix B. We also received technical comments from the Coast Guard on the draft report, and we revised the report as appropriate. The Coast Guard concurred with recommendations 2, 3, and 4, which we consider open and resolved. The Coast Guard did not concur with recommendation 1, which we consider open and unresolved. A summary of the Coast Guard's response and our analysis follows.

In response to our draft report, the Coast Guard identified concerns with the data delays noted in our access to information paragraph. We disagree with some of the statements Coast Guard officials made. Specifically, the Coast Guard stated that we requested "Privileged User" level access. Our initial request was for read-only access. Additionally, the Coast Guard stated that we amended our request for system access to a request for data extracts. We requested data extracts after we were unable to obtain direct system access to avoid further delays to our audit work. The Coast Guard eventually denied our request for read-only access.

Coast Guard Response to Recommendation 1: Non-Concur. The Coast Guard stated that a contingency plan would be redundant and ineffective at resolving asset availability issues. It also stated that a one-size-fits-all contingency plan is not feasible due to the dynamic nature of the drug interdiction mission. Coast Guard officials stated that the component uses the Global Force Management process for asset planning across its missions, including the drug interdiction mission. They stated that the process includes a strategic review, which identifies specific areas where risks exist and highlights contingency plans for those areas. Also, as part of this process, the Coast Guard selected the drug interdiction mission to highlight in FYs 2023 and 2024 and created contingency plans for asset shortages, which includes availability of partner nation assets, Law Enforcement Detachment on allied vessels, alternative means of increasing partner interdictions, and other considerations to meet the overall Coast Guard goals.

OIG Analysis: During our audit, we found that the Coast Guard did not have a contingency plan to address situations impacting cutter unavailability. We reviewed the Coast Guard's Global Force Management process and determined that it does not identify asset availability



for the counterdrug mission. We requested the Coast Guard's FY 2023 and 2024 contingency plans, which identified program risks, potential impacts to the mission, and a risk response. The plan included general actions the Coast Guard takes to reduce the likelihood of the risk occurring but did not include actions the Coast Guard will take after a risk occurs to reduce the impact of asset availability. The recommendation will remain open and unresolved until the Coast Guard designs and implements a plan to reduce the impact of asset availability on the counterdrug mission.

Coast Guard Response to Recommendation 2: Concur. The Coast Guard is updating the MISLE database. The updates include requiring commanding officer and district-level reviews to ensure data accuracy and including these changes in updated versions of the system. Estimated Completion Date: September 30, 2025.

OIG Analysis: The Coast Guard's actions are responsive to the recommendation, which will remain open and resolved until the Coast Guard provides documentation showing that all planned corrective actions are completed.

Coast Guard Response to Recommendation 3: Concur. The Coast Guard will conduct a job task analysis of the Digital Evidence First Responder Course to analyze the training requirements to ensure they align with DESS mission collection activities. The Coast Guard is also developing a Capability Sustainment Plan in support of the DESS mission. This plan will codify the resourcing processes and training requirements and evaluate the DESS mission requirements to determine the appropriate number of training quotas to meet DESS mission needs. Estimated Completion Date: June 30, 2026.

OIG Analysis: The Coast Guard's actions are responsive to the recommendation, which will remain open and resolved until the Coast Guard provides documentation showing that all planned corrective actions are completed.

Coast Guard Response to Recommendation 4: Concur. The Coast Guard will ensure all entries to the Consolidated Counter Drug Database are updated to measure the collection of data from document and media exploitation activities and analyze each event. The Coast Guard is also working to access the U.S. Customs and Border Protection's Document and Media Exploitation repository to allow more efficient management of DESS information. This will allow the Coast Guard to capture, analyze, and report on information related to the DESS program's success. Estimated Completion Date: December 31, 2025.

OIG Analysis: The Coast Guard's actions are responsive to the recommendation, which will remain open and resolved until the Coast Guard provides documentation showing that all planned corrective actions are completed.



Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107–296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine to what extent the Coast Guard interdicts noncommercial vessels smuggling drugs into the United States. To answer this objective, we reviewed Federal laws and regulations related to the Coast Guard's ability to interdict noncommercial vessels suspected of drug smuggling. We also reviewed the Coast Guard's internal controls, policies, procedures, and guidance associated with the counterdrug mission. Further, we reviewed congressional testimony and prior audits from DHS OIG and the U.S. Government Accountability Office related to our objective.

In planning and performing our audit, we identified the internal control components and underlying internal control principles that were significant to the audit objective. Specifically, we reviewed how the Coast Guard analyzes and responds to risks and changes related to the counterdrug mission, its implementation of internal control activities, how it uses quality information to achieve the objectives, and how it communicates with external partners. We identified internal control deficiencies that could adversely affect the Coast Guard's ability to interdict non-commercial vessels suspected of drug smuggling. However, because we limited our review to these internal control components and underlying principles, it may not have disclosed all internal control deficiencies that may have existed at the time of our audit.

We conducted interviews with personnel from the Coast Guard's Maritime Law Enforcement Office and Office of Intelligence to understand their roles and responsibilities for drug interdiction efforts. We also met with officials from the Atlantic and Pacific areas to determine their responsibilities related to interdicting non-commercial vessels. Also, we met with officials at the district level, boarding team members, and Tactical Law Enforcement officials to understand how they conduct the interdiction operations. Finally, we met with officials located at the Joint Interagency Task Force – South to determine how the agencies collaborate during drug interdiction operations. We conducted site visits to Coast Guard headquarters; Coast Guard field office locations in Miami, Florida, and Portsmouth, Virginia; and the Joint Interagency Task Force – South office in Key West, Florida. We held a combination of in-person and virtual meetings and interviews to answer our audit objective.

We analyzed the Coast Guard's drug interdiction goals and how the Coast Guard's resources impacted the ability to meet those goals. Our analysis included obtaining cocaine amounts removed by the Coast Guard and recalculating performance metrics to compare to the Coast



Guard's goals. We obtained data from the Coast Guard regarding the availability of its cutters and calculated the total number of days the Coast Guard cutters were not available to conduct drug interdictions. We used this data to develop an estimate for the total amount of potential drugs missed.

We used data analysis software to draw a statistically random sample of drug cases recorded in the MISLE database from FYs 2021 through 2023. Given a total population of 918 cases, the statistically valid sample size based on 95 percent confidence level, 5 percent sampling error, and 50 percent population proportion is 271.

We tested each drug casefile in our statistical sample to verify the Coast Guard conducted commanding officer and district-level reviews on the cases, recorded the interdiction results in the system, and attached supporting documentation in the system when a violation was identified. To conduct our test, we requested screenshots from the MISLE system for each case showing the reviews were completed, the results were entered, and the supporting documentation was attached. We considered a record to be inaccurate if the Coast Guard did not upload the required supporting documentation or had not entered the results into the system.

Finally, we evaluated the Coast Guard's DESS program to determine how the component determined the resources needed when transitioning DESS from a pilot program to a mission requirement. We reviewed the DESS mission needs memorandum to determine what resources it identified as requirements when transitioning the program. We analyzed information pertaining to the total number of DESS kits available to the Coast Guard and the total number of individuals trained for the program. We also attempted to evaluate the database used as part of the program, but the Coast Guard did not have a database to store DESS-derived data at the time of our audit.

To assess the reliability of the Coast Guard's counterdrug data, we identified MISLE as the primary storage database for all law enforcement–related information. We identified relevant system controls through reviews of policies and procedures and interviews with officials from the Coast Guard. Before testing the counterdrug cases, we analyzed the drug case data provided from MISLE. We compared the counterdrug cases from MISLE to the data in the Department of Defense Consolidated Counterdrug Database to verify that the system contained complete drug case information. Following our data reliability assessment of MISLE, we determined the data was sufficiently reliable to support the findings, recommendations, and conclusions in the report.

We conducted this audit from July 2023 through October 2024 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, 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 on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

DHS OIG's Access to DHS Information

DHS OIG experienced significant delays obtaining the data required to complete this audit. The Coast Guard faced challenges providing system access and denied our initial requests for direct, read-only access to the Asset Logistics Management Information System and MISLE databases after an 111-day delay. To complete the audit, we had to request data extracts in lieu of system access. The Coast Guard worked with DHS OIG to provide the requested data extracts after denying system access. However, the Coast Guard did not make complete, usable data for this audit available to DHS OIG until 205 days after our initial request for system access.



OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Appendix B: Coast Guard Comments on the Draft Report



Commandant United States Coast Guard 2703 Martin Luther King Jr Ave SE Washington, DC 20593-7618 Staff Symbol: CG-8D Phone: (202) 372-3476 Fax: (202) 372-8399

7500 23 Jan 2025

MEMORANDUM

mor From: Craig A. Bennett COMDT (CG-8D)

To: Joseph V. Cuffari, Ph.D. Inspector General Reply to Audit Liaison Attn of: CDR M. W. Zinn (202) 372-3535

Subj: MANAGEMENT RESPONSE TO DRAFT REPORT: THE COAST GUARD FACES CHALLENGES INTERDICTING NON-COMMERCIAL VESSELS SMUGGLING DRUGS INTO THE UNITED STATES

Ref: (a) OIG Project No. 23-036-AUD-USCG

1. Per reference (a), thank you for the opportunity to comment on this draft report. The U.S. Coast Guard appreciates the Office of the Inspector General's (OIG) work in planning and conducting its review and issuing this report.

2. Coast Guard leadership is pleased to note OIG's recognition that, from fiscal years (FY) 2021 through 2023, the Coast Guard interdicted an estimated 421.9 metric tons of cocaine. The Coast Guard remains committed to strengthening its tactics, techniques, and procedures to stop the illicit flow of drugs entering the United States by disrupting the flow of cocaine and other illegal drugs in the maritime environment.

3. Contrary to the assertion in OIG's draft report, however, the Coast Guard did not deny or delay OIG's access to information needed to complete this audit. Although it is correct that OIG requested access to the Marine Information for Safety and Law Enforcement (MISLE) database on October 18, 2023, and requested access to the Asset Logistics Management Information System (ALMIS) and Electronic Asset Logbook (EAL) systems on November 1, 2023, it is important readers of this report understand that the OIG's request was not simply for "direct, read-only access." In fact, the OIG requested "Privileged User"-level access, which carries the risk of inflicting damage or harm to the system-of-record data contained within the system, and of disabling the system for all users. Per COMDTINST 5500.13 (series), "Cybersecurity Governance," a Privileged User is a trusted user that is authorized to perform security-relevant functions that ordinary users are not authorized to perform (e.g., system administrator, database administrator). Specifically, the MISLE, ALMIS, and EAL systems require users to meet a high level of certification and close scrutiny for trusted privileged access to be granted. Accordingly, a Privileged User is expected to have years of technical education and practical experience understanding Coast Guard missions and underlying context to have trusted and privileged access.



4. Coast Guard uses and operates information systems and networks connected to or operating under the Department of Defense (DoD) Information Network (DoDIN) to promote readiness with the armed forces and national security and national defense missions. Accordingly, Privileged Users to Coast Guard systems must also adhere to DoD cybersecurity requirements, standards, and policies that directly affect the DoDIN and DoD mission assurance, while also adhering to U.S. Department of Homeland Security (DHS, or the Department) oversight and compliance requirements.

5. To mitigate inadvertent data spills, damage, or harm, Coast Guard coordinated OIG's request with others having equities in the request and worked with the OIG to reach a reasonable accommodation and ensure the OIG received the information needed to perform its work without jeopardizing confidentiality or security. For example, the OIG amended its request for system access to a request for data extracts from the MISLE and ALMIS/EAL systems on January 17, 2024, and the Coast Guard provided the MISLE extracts on February 28, 2024, and the ALMIS/EAL extracts on March 7, 2024. Further, on January 23, 2024, the Coast Guard requested clarification of the parameters of the OIG's request, after which Coast Guard provided responses in accordance with an agreed-upon timeline between the Coast Guard and the OIG, which and was completed by March 7, 2024.

6. In addition, it is important to note that extracting requested data was a significant challenge. Personnel from Coast Guard and the OIG participated in a walkthrough meeting held on February 13, 2024, to review what was needed for the audit and what data may be available. To address the OIG's requests, novel database queries had to be built as the database is not designed for ad-hoc reporting, and the data was not set up to answer OIG's requests. Limited Coast Guard staffing was also pulled from mission-essential operations to produce this ad-hoc request.

7. Ultimately, the Coast Guard's actions to provide the OIG with data extracted from these systems mitigated risks to the protection of sensitive information including but not limited to critical infrastructure and defense information unrelated to this audit, as well as prevented potential cyber security violations, and helped avoid delays in OIG's audit completion. Taking an appropriate amount of time to understand OIG Information Technology system and data access requests and reach an accommodation on when needed should not be viewed as a "delay" or "denial," but rather due diligence to protect the sensitive information.

8. The draft report contained four recommendations, one with which the Coast Guard non-concurs (Recommendation 1) and three with which the Coast Guard concurs (Recommendations 2-4). Attached find our detailed response to each recommendation. The Coast Guard previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for OIG's consideration, as appropriate.

9. Again, thank you for the opportunity to review and comment on this draft report. If you have any questions, my point of contact is CDR Matthew Zinn who can be reached at (202) 372-3535 or <u>Matthew.W.Zinn@uscg.mil</u>. We look forward to working with you again in the future.

#

Enclosure: (1) U.S. Coast Guard Response to OIG Draft Report Recommendations

2



Management Response to Recommendations Contained in OIG 23-036-AUD-USCG

OIG recommended that the Commandant of the U.S. Coast Guard:

Recommendation 1: Develop and implement a drug interdiction contingency plan to prioritize the availability of cutters for drug interdiction missions and to mitigate the risk of cutters being unavailable.

Response: Non-concur. Development of a contingency plan for drug interdiction assets would be redundant and not effective to resolve the documented issue of asset availability. Specifically, the Coast Guard currently has a robust Global Force Management (GFM) process¹ that enables deliberate planning for employment of the Service's multi-mission assets across the Service's 11 statutory missions, as well as processes for both routine and emergent reallocation of assets when contingencies or higher priority mission demands arise. This process already addresses the drug interdiction mission in the same manner as the Service's other 10 missions, such as Search and Rescue or Illegal, Unreported and Unregulated Fishing.

Further, the Coast Guard currently participates in the Department of Defense's (DoD's) GFM² process to accomplish the same functions via DoD requests for Coast Guard assets, including detection and monitoring support to the U.S. government's maritime drug interdiction mission. Those processes account for situations in which Coast Guard cutters may be unavailable for counterdrug operations. Accordingly, force allocation changes are made through a risk management process with mitigation strategies considered. Specifically, during the annual Strategic Review, the Coast Guard identifies specific areas in which risk exists and highlights contingency plans for consideration. The Coast Guard Deputy Commandant for Operations selected the drug interdiction mission to highlight in FY 2023 and FY 2024, and created contingency plans for asset shortages in this mission space. These contingency plans consider real time availability of partner nation assets, Law Enforcement Detachment space available on allied vessels, alternative means of increasing partner interdictions, and other considerations to effectively meet overall Coast Guard goals. These contingencies are also reviewed and modified as needed by appropriate leadership depending on the asset under consideration throughout the year to ensure maximum flexibility.

Development of a one-size-fits-all contingency as recommended by the OIG is not feasible due to the dynamic nature of the drug interdiction mission. Although the Coast Guard faces challenges with the availability of interdiction assets, focusing resources narrowly to achieve all drug removal goals will negatively impact support to other, higher priority, missions.

The Coast Guard requests that OIG consider this recommendation resolved and closed.

Encl: (1)

¹ Defined by COMDTINST 3120.4C, "Coast Guard Global Force Management (CG GFM)," dated July 2024; <u>https://media.defense.gov/2024/Sep/17/2003545303/-1/-1/0/CI 3120 4C.PDF</u>, and other associated documents. ² CJCSM 3130.06D, "Global Force Management Allocation Policies and Procedures," dated June 20, 2024; <u>https://www.jcs.mil/Portals/36/Documents/Library/Manuals/CJCSM%203130.06D.pdf</u>.



Recommendation 2: Update the Marine Information for Safety and Law Enforcement (MISLE) system to require commanding officer and district-level reviews to ensure data accuracy within the system.

Response: Concur. The Coast Guard Office of Law Enforcement Policy (CG-MLE) is in the process of updating the entirety of the MISLE database, including required data entries and procedures. Currently, CG-MLE is working with various Coast Guard Offices, as appropriate, to implement needed changes within MISLE—to include requiring commanding officer and district-level reviews to ensure data accuracy—and to ensure these changes are included in updated versions of the system. An initial task was created on December 16, 2024, to have MISLE updated in accordance with this recommendation.

Estimated Completion Date (ECD): September 30, 2025.

Recommendation 3: Conduct a needs assessment for the Digital Evidence Search and Seizure program, including the number of kits and trained personnel needed to ensure the program's success in gathering intelligence while at sea.

Response: Concur. On July 18, 2023, the Coast Guard Office of Specialized Capabilities Document and Media Exploitation (CG-7213 DOMEX) leveraged an internal Digital Evidence Search and Seizure (DESS) Mission Needs Memo³ outlining patrol coverage requirements to determine that 10 kits met the capability resource needs to support DESS collections. The Coast Guard currently exceeds the requirement regarding cutters per day allocated to Joint Interagency Task Force South (JIATF-S).

By the end of September 2025, CG-7213 DOMEX will purchase three additional DESS kits to address potential increased mission demands. The additional kits will increase the total available DESS kit for deployment to 13, and further exceed the JIATF-S patrol coverage requirement regarding cutters per day allocated to JIATF-S. Beginning in June 2025 and completed by the end of June 2026, the Coast Guard Force Readiness Command, in coordination with CG-7213 DOMEX, will also conduct a job task analysis of 100558, the "Digital Evidence First Responder Course," to analyze training requirements in alignment with DESS mission collection activities.

Further, by the end of June 2025, the CG-7213 DOMEX Program Office will develop a Capability Sustainment Plan in support of the DESS mission. Once complete, this plan will codify capability resourcing processes and training requirements and evaluate personnel attrition/retention metrics and DESS mission requirements to determine the appropriate number of training quotas required to meet DESS mission needs.

Overall ECD: June 30, 2026.

³ "Digital Evidence Search and Seizure (DESS) Maritime Law Enforcement/Intelligence Mission Needs," dated July 2023.



Recommendation 4: Identify and implement a centralized database to capture, analyze, and report on information related to the Coast Guard's Digital Evidence Search and Seizure program's success.

Response: Concur. The Coast Guard is currently using the U.S. Intelligence Community's Consolidated Counterdrug Database (CCDB) for measuring drug flow and interdiction performance. The Coast Guard Intelligence Coordination Center (ICC), Pacific Area Maritime Intelligence Fusion Center (MIFC) and Atlantic Area MIFC will collaborate as appropriate to ensure all CCDB entries are updated to measure DOMEX collection and analysis for each event. In addition, the Coast Guard will identify the best method of presenting more comprehensive interdiction information collection and analysis performance metrics to stakeholders.

Specifically, CG-MLE will continue to work with other Coast Guard offices to compile, analyze, and report on UNCLASSIFIED DOMEX metrics., and may incorporate this data into the Coast Guard's annual interdiction report which will be complete by the end of December 2025. ICC is also working to potentially access U.S. Custom and Border Protection's DOMEX repository which may provide a solution that allows more efficient management of DESS information. By using this approach, the Coast Guard anticipates expanding on available databases and resources to access to integrated information to capture, analyze, and report on information related to the Coast Guard's Digital Evidence Search and Seizure program's success.

ECD: December 31, 2025.



Appendix C: Report Distribution

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