



THE DRUG ENFORCEMENT ADMINISTRATION'S IMPLEMENTATION OF THE GOVERNMENT PERFORMANCE AND RESULTS ACT

U.S. DEPARTMENT OF JUSTICE
OFFICE OF THE INSPECTOR GENERAL
AUDIT DIVISION

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EXECUTIVE SUMMARY

The Government Performance and Results Act of 1993 (GPRA) seeks to shift government performance and accountability away from a preoccupation with counting activities to focus instead on the results or outcomes of those activities. GPRA provides a performance-based management framework for agencies to set goals, measure progress towards those goals, deploy strategies and resources to achieve the goals, and use performance data to make decisions to improve performance.

Our audit focused on evaluating the Drug Enforcement Administration's (DEA's) implementation of GPRA. We examined whether the DEA had: 1) developed an adequate strategic goal and objectives that were consistent with the Department's strategic goals and objectives; 2) established performance indicators for all decision units included in the DEA's budget requests;¹ and 3) established an effective system of controls to collect, analyze, and report data related to its performance indicators. We performed our audit work at the DEA Headquarters and its field divisions in Atlanta, Chicago, Los Angeles, New Orleans, and New York.

Our audit determined that the DEA had failed to meet key aspects of GPRA as we identified deficiencies in each of the three areas reviewed. We found that the DEA had developed a strategic goal and objectives that were consistent with the Department's strategic goals and objectives, but the DEA's strategic goal and objectives were not definitive enough to allow for an assessment of whether the goal and objectives were being achieved. In addition, even though the DEA had established performance indicators for all of its budget decision units, it had not established:

- specific criteria for its field divisions to designate organizations as "priority target" organizations, which is a key element of its strategic goal;
- specific criteria for its field divisions to report on the primary performance indicator – priority target organizations disrupted or dismantled;

¹ A decision unit is a specific activity or project identified in an agency's annual budget.

- an effective system to collect, analyze, and report performance data for all of its performance indicators;
- procedures to verify the performance data for all of its performance indicators;
- accurate performance data for one of the five field divisions included in our review; and
- reasonable performance goals for its performance indicators.

A brief overview of each of these deficiencies follows.

Adequacy of Strategic Goal and Objectives: The DEA established a strategic goal to “Identify, target, investigate, disrupt, and dismantle the international, national, state, and local drug trafficking organizations that are having the most significant impact on America.” The DEA also established 15 strategic objectives for achieving this strategic goal. However, neither the strategic goal nor the 15 strategic objectives were quantitative, directly measurable, or assessment-based as required by Office of Management and Budget (OMB) Circular A-11. As such, it is impossible to assess whether the DEA is achieving its goal and objectives.

After we issued the draft report, the DEA informed us that it has revised its strategic plan since we completed our audit fieldwork. The DEA updates its 6-year strategic plan annually. At the time of our audit fieldwork, the DEA had completed its FY 2001-2006 Strategic Plan. We found that the goal and objectives in the DEA’s FY 2001-2006 Strategic Plan were not quantitative, directly measurable, or assessment based. Subsequent to the exit conference for the audit, the DEA informed us that it was then drafting its FY 2003-2008 Strategic Plan to address these shortcomings. In response to a draft of this audit report, the DEA stated that it has drafted its FY 2003-2008 Strategic Plan to include a general long-term goal and four strategic goals with 2-year and 5-year quantitative, time-specific objectives, which it believes will address some of the recommendations in this report. The DEA also stated that these new goals and objectives meet the requirements of GPRA and OMB Circular A-11. The DEA stated that the revised Strategic Plan would be provided to the Office of the Inspector General upon approval of the plan.

We believe the DEA’s actions to revise its goal and objectives in the FY 2003-2008 Strategic Plan, partly in response to this audit, are positive steps towards improving the DEA’s ability to measure achievement of its goals and objectives. Once we receive the DEA’s FY 2003-2008 Strategic

Plan, we will evaluate the adequacy of the DEA's revised goals and objectives and provide feedback to the DEA.

Criteria for Designating Priority Target Organizations: The DEA had developed a general definition of a "priority target organization," but it had not established specific criteria for identifying illicit organizations as priority target organizations. As a result, the DEA's field divisions were not consistent in how they determined whether an organization should be reported as a priority target.

Criteria for Reporting Priority Target Organizations as Disrupted or Dismantled: Similarly, the DEA also had developed a general definition for what constitutes a "disrupted or dismantled" priority target organization, but it had not established specific criteria for reporting priority target organizations as disrupted or dismantled. As a result, the DEA's field divisions were not consistent in how they reported priority target organizations as disrupted or dismantled.

System to Collect, Analyze, and Report Performance Data: The DEA had not developed a system to effectively track performance indicators for five of its six performance indicators. As a result, we could not determine whether meaningful performance data would be available to effectively measure performance against these performance indicators.

Procedures to Verify Performance Data: The DEA had developed the Priority Target Resource and Reporting System (PTARRS) for tracking and reporting performance data on priority target organizations. We found that PTARRS generally was adequate to verify the domestic priority target performance data. Specifically, we reviewed the PTARRS system controls and cross-checking methods and determined them to be acceptable to verify the domestic priority target performance. The acceptability of these verification procedures is supported by the minimal reporting errors that we identified as discussed below. However, PTARRS was not used to track performance data for the DEA's five other performance indicators. As a result, the DEA is unable to verify the accuracy and reliability of the information recorded, reported, and used to evaluate its performance for these indicators.

Accuracy of Performance Data Reported: In its FY 2003 budget request, the DEA reported that it had identified 566 priority target organizations during FY 2001.² Subsequent to submitting the budget

² Because agency budget requests are prepared well in advance of the fiscal year they fund, the budgets contain actual performance results for the period two fiscal years prior to

request, the DEA revised the number of priority targets for FY 2001 to 726. Two hundred forty-eight of the 726 priority target organizations were for the five DEA field divisions included in our review. Our audit determined that all 248 organizations were being investigated by the DEA as priority target organizations and as such, were properly reported as priority target organizations for FY 2001. In its FY 2003 budget request, the DEA also reported that it had disrupted or dismantled 100 priority target organizations during FY 2001. Forty-one of the 100 priority target organizations reported were for the five DEA field divisions included in our review. Our audit determined that the number of priority target organizations disrupted and dismantled was not correctly reported for one of the five field divisions. Specifically, 2 of the 28 priority target organizations reported as disrupted or dismantled should not have been reported as such by the Los Angeles field division. In addition, another priority target organization was reported with the wrong case number. The DEA subsequently corrected the errors when it entered the data into PTARRS and as noted above, the PTARRS system controls were adequate to verify domestic priority target data. Therefore, no action is required by the DEA on this issue.

Performance Goals: The DEA established goals for the number of priority target organizations that it would identify each fiscal year and for the number of priority target organizations that it would disrupt and dismantle each fiscal year. However, the goals were usually well below what the DEA should expect to achieve based on past performance data.

As a result of these deficiencies, the ability of the DEA, the Department, Congress, and the public to assess the effectiveness of the DEA's performance is diminished.

In our report, we made seven recommendations to assist the DEA in developing and reporting reliable and accurate performance results. We recommended that the DEA establish a strategic goal and objectives that can be effectively measured and develop specific criteria for the field divisions to use for identifying priority target organizations and for reporting whether the organizations have been disrupted or dismantled. We also recommended that the DEA take actions to develop a system to track all of its performance results, fully report its performance results, establish procedures and controls to verify all of its performance data, ensure performance data is correctly reported for all field divisions, and establish better performance goals for its performance indicators.

the budget year. Consequently, an agency's FY 2003 budget includes actual performance results for FY 2001.

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INTRODUCTION

Background

The Drug Enforcement Administration (DEA) is responsible for enforcing Federal laws and regulations that relate to controlled substances. That responsibility includes identifying and targeting organizations and individuals involved in growing, manufacturing, or distributing controlled substances appearing in or destined for the United States. The DEA also is responsible for taking actions to: 1) reduce the availability of and demand for illicit controlled substances on the domestic and international markets, and 2) control the diversion of legitimately manufactured controlled substances from their lawful purpose into the illicit drug traffic. The DEA's performance in carrying out these responsibilities is essential to curb the amount of controlled substances available in the United States. Our audit focused on evaluating whether the DEA had: 1) developed an adequate strategic goal and objectives that are consistent with the Department of Justice's (Department) strategic goals and objectives, 2) established performance indicators for all the decision units included in the DEA's budget requests,³ and 3) established an effective system of controls to collect, analyze, and report data related to its performance indicators.

Government Performance and Results Act of 1993

Congress mandated performance-based management in Federal agencies through a series of statutory reforms, the centerpiece of which is the Government Performance and Results Act of 1993 (GPRA). It seeks to improve the effectiveness, efficiency, and accountability of Federal programs by establishing a system for agencies to set goals for program performance and to measure results. GPRA requires agencies to develop strategic plans that identify their long-range strategic goals and objectives, annual performance plans that set forth corresponding annual goals and indicators of performance, and annual performance reports that describe the actual levels of performance achieved compared to the annual goals. The Justice Management Division (JMD) has oversight responsibility for implementation of GPRA within the Department.

The Department of Justice's Implementation of GPRA

Strategic planning is the first step in the ongoing planning and implementation cycle for GPRA. This cycle, which is at the heart of the Department's efforts to implement performance-based management,

³ A decision unit is a specific activity or project identified in an agency's annual budget.

involves setting long-term goals and objectives; translating those goals and objectives into budgets and program plans; implementing programs and monitoring their performance; and evaluating results. In this cycle, the Department's overall strategic plan provides the framework for component and function-specific plans as well as annual performance plans, budgets, and reports. At the heart of performance-based management is the idea that focusing on mission, agreeing on goals, and reporting results are keys to improved performance. Performance-based management was on the Office of the Inspector General's (OIG) list of Top Management Challenges in the Department of Justice (2002). This list of top challenges was originally prepared in response to congressional requests and is now required by the Reports Consolidation Act of 2000 to be included in the Department's annual Performance and Accountability Report.

The DEA's Implementation of GPRA

The DEA's Executive Policy and Strategic Planning Staff has responsibility for implementation of GPRA within the DEA relating to developing its strategic goal and objectives. The DEA's Office of Resource Management has responsibility for developing performance indicators to evaluate the DEA's performance against the goal and objectives, and for reporting the performance results in the DEA's annual budget requests.

The DEA's strategic goal is to identify, target, investigate, disrupt, and dismantle the international, national, state, and local drug trafficking organizations that are having the most significant impact on America. The DEA describes these organizations as "priority targets." This strategic goal underscores the DEA's belief that most drug trafficking organizations are part of a web linking international with national/regional and state and local organizations. The DEA further believes that effective enforcement operations can be developed and simultaneously directed against targeted organizations in each sector, thereby disrupting the networks that link them.

For each of the four strategic areas identified in the DEA's strategic plan, the DEA developed performance indicators for each of the its four decision units as follows:

Decision Unit	Performance Indicators
Domestic Enforcement	Number of priority target organizations disrupted/dismantled Contribution to reduction in drug use and availability
International Enforcement	Number of priority target organizations disrupted/dismantled Contribution to reduction in drug use and availability
Diversion Control	Number of suppliers disrupted/dismantled
State and Local Assistance	Contribution to reduction in drug use and availability

Source: DEA's FY 2004 Congressional Budget Request

From April 2001 to April 2002, the DEA tracked its progress in disrupting and dismantling priority target organizations using a labor intensive and time consuming manual system. In April 2002, the DEA implemented a computer application known as the Priority Target Resource and Reporting System (PTARRS). PTARRS automates the process of nominating, reviewing, and approving organizations as priority targets and provides the domestic field divisions and domestic Headquarters Operations the capability to track the progress made and resources expended against priority target organizations. The DEA is in the process of upgrading PTARRS to enhance the usefulness and flexibility of the system. The contract for upgrading PTARRS was awarded in September 2002, and the DEA is currently working with the contractor to develop a timeline for implementing the upgrade.

Prior Audits

The General Accounting Office (GAO) has issued numerous reports related to the Department's implementation of the GPRA from 1999 to 2003. The OIG also issued a report in 2000 that related to the Department's implementation of the GPRA. The following GAO reports and OIG report address issues specifically related to the DEA.

In a 1999 report, the GAO reported on the DEA's drug control strategies and operations.⁴ The GAO reported that the DEA had enhanced or changed important aspects of its operations (such as strategies, programs, initiatives, and approaches) and concluded that the DEA's strategic goal and objectives, and its enhanced programs and initiatives, had been consistent with the Federal government's National Drug Control Strategy. However,

⁴ Drug Control, DEA's Strategies and Operations in the 1990s (GAO/GGD-99-108, July 1999)

the GAO found that the DEA had not developed measurable performance targets for its programs and initiatives that were consistent with those adopted for the National Drug Control Strategy. As a result, it was difficult for the DEA, the Department, Congress, and the public to assess how effective the DEA had been in achieving its strategic goal and the effect its programs and initiative have had in reducing the illegal drug supply.

In a 2000 report, the OIG reported on the Department's FY 2000 Summary Performance Plan and concluded that the plan generally met the requirements of the GPRA and Office of Management and Budget (OMB) guidance.⁵ However, the OIG reported that the DEA had either not established any numeric targets or the numeric targets were not realistic. The DEA also had not included several of the Department's performance goals in its performance plan.

In a 2000 report, the GAO made observations on the Department's FY 1999 Performance Report and the FY 2001 Performance Plan and concluded that the Department's progress in achieving desirable program outcomes could not be readily determined since the Department had not developed performance goals and indicators that objectively captured and described performance results.⁶ The GAO found that the Department's performance indicators: 1) were more output than outcome oriented, 2) did not capture all aspects of performance, and/or 3) had no stated performance targets. With respect to the DEA, the GAO found that its FY 1999 domestic drug-related performance goals were not directly measurable. Moreover, the indicators used by the DEA, while quantifiable, were more output than outcome oriented.

In a 2001 report, the GAO evaluated the Department's FY 2000 Performance Report and its progress towards achieving key outcomes and concluded that it was difficult to determine the Department's overall progress towards achieving selected key outcomes. The GAO stated that generally the Performance Report lacked: 1) fiscal year 2000 performance targets to measure success, and 2) a clear linkage between performance indicators and outcomes.⁷ With respect to the DEA and its availability and/or use of illegal drugs performance measure, the GAO reported that it

⁵ Department of Justice FY 2000 Summary Performance Plan under GPRA (00-11, March 2000)

⁶ Observations on the Department of Justice's Fiscal Year 1999 Performance Report and Fiscal Year 2001 Performance Plan (GAO/GGD-00-155R, June 2000)

⁷ Department of Justice, Status of Achieving Key Outcomes and Addressing Major Management Challenges (GAO-01-729, June 2001)

was difficult to determine the DEA's progress because the Department did not have fiscal year performance targets for two of its five indicators, and the relationship of one measure to the outcome was not clear.

In a 2003 report, the GAO reported on the five major performance and accountability challenges and program risks facing the Department as it carries out its mission.⁸ One of the five major performance and accountability challenges discussed in this report is the Department's development of measurable performance targets to help the DEA determine its progress in reducing the availability of illegal drugs. With respect to this issue, the GAO reported that the DEA had: 1) developed management plans to help measure program effectiveness and provided organizational accountability for priority performance targets; 2) established performance targets for disrupting and dismantling international and domestic drug trafficking organizations; and 3) developed a system to capture, verify, and validate data on all priority projects.

⁸ Major Management Challenges and Program Risks in the Department of Justice (GAO-03-105, January 2003)

FINDING AND RECOMMENDATIONS

THE DEA'S IMPLEMENTATION OF THE GOVERNMENT PERFORMANCE AND RESULTS ACT NEEDS TO BE IMPROVED

Our audit determined that the DEA had developed a strategic goal and objectives that were consistent with the Department's strategic plan, but the DEA's goal and objectives were not adequate to allow for a future assessment of whether they were being achieved. While the DEA had developed performance indicators for all of its budget decision units, the DEA had not: 1) reported performance results for all its performance indicators, 2) established specific criteria for the field divisions to identify priority target organizations; 3) established specific criteria for the field divisions to identify and report on disrupted or dismantled priority target organizations; 4) developed an effective system to collect, analyze, and report performance data for all of its performance indicators; 5) established procedures and controls to verify the performance data for all of its performance indicators; 6) reported the correct number of priority target organizations disrupted and dismantled for one of the five field divisions included in our review; and 7) established reasonable performance goals for its performance indicators. Until these weaknesses are corrected, it will be difficult for the DEA, the Department, Congress, and the public to assess how effective the DEA has been in achieving its intended results.

Adequacy of the DEA's Strategic Goal and Objectives

To determine if the DEA had established a goal and objectives that were consistent with the Department's goals and objectives, we compared the DEA's FY 2001-2006 Strategic Plan to the Department's FY 2001-2006 Strategic Plan. The DEA established a strategic goal to "Identify, target, investigate, disrupt, and dismantle the international, national, state, and local drug trafficking organizations that are having the most significant impact on America." Our audit determined that this goal was broadly encompassed within the Department's second goal of "Enforcement of Federal Criminal Laws." The DEA had also established the following 15 strategic objectives for accomplishing its strategic goal:

Objective 1	Identify and prioritize the most significant international drug trafficking organizations
Objective 2	Disrupt the networks, the operations, and the resource bases of targeted international drug trafficking organizations

Objective 3	Dismantle those domestic organizations that are directly affiliated with international cartels
Objective 4	Identify and target the national/regional organizations most responsible for the domestic distribution and manufacture of drugs
Objective 5	Systematically dismantle the targeted organizations by arresting/convicting the leaders and facilitators, seizing and forfeiting their assets, destroying their command and control networks
Objective 6	Reduce drug-related violent crime caused by drug traffickers
Objective 7	Improve the capabilities of state and local enforcement efforts with specialized training programs
Objective 8	Educate local audiences with aggressive demand reduction programs
Objective 9	Assist local efforts to control the production of cannabis and methamphetamine
Objective 10	Achieve excellence in management practices by integrating planning, reporting, legal review, and decision-making processes, including those for human resources, budget, financial management, information management, procurement, facilities, and program performance
Objective 11	Strengthen oversight and integrity programs, ensure consistent accountability and emphasize our core mission responsibilities
Objective 12	Provide training and career development opportunities
Objective 13	Promote a diverse workforce at all levels
Objective 14	Develop and implement an information technology architecture that provides common, standards-based infrastructures; ensures interconnectivity and interoperability; and provides adequate safeguards against unwarranted, inappropriate, and unauthorized access or use of the system
Objective 15	Certify and accredit information systems in accordance with federal requirements and Department of Justice policy to achieve adequate operational security and protect sensitive data

Our audit determined that the first nine objectives were consistent with the Department's objective to "Reduce the threat, trafficking, and related violence of illegal drugs by identifying, disrupting, and dismantling drug trafficking organizations." Furthermore, the remaining six objectives were broadly encompassed under the objectives for the Department's eighth goal to "Ensure professionalism, excellence, accountability, and integrity in the management and conduct of Department of Justice activities and programs."

In addition, the DEA had also taken steps to address the Department's re-positioning of protecting America against terrorism as its number one goal. The DEA proposed changes for its FY 2002-2007 Strategic Plan to

incorporate language that addressed terrorism and how it fits into the DEA's overall plan. According to a DEA official, terrorism is an element of drug trafficking and the DEA's primary goal of focusing on drug trafficking organizations will remain the same. As such, the DEA incorporated language in its strategic plan to address the link between drug trafficking and terrorism, as well as how the DEA can continue its current plan while also meeting the Department's emphasis on protecting America against terrorism.⁹

We also evaluated the DEA's strategic goal and objectives to determine if they were adequate to allow for a future assessment of whether the goal and objectives were being achieved. OMB Circular A-11 requires that strategic goals and objectives be either quantitative, directly measurable, or assessment-based to allow for future assessment of achievement. OMB Circular A-11 provides the following illustrative examples of adequate goal and objective definitions:

Quantitative	Seventy percent of American households will own their own home in 2010.
Directly measurable	Complete the sequencing of the horse genome by June 2005.
Assessment-based	Educational attainment at grade nine of children who participated in the Sure Learn program will be at least equal to the attainment level of all similarly aged children.

Our audit determined that the DEA's strategic goal was not quantitative, directly measurable, or assessment-based. The DEA's strategic goal is to identify, target, investigate, disrupt, and dismantle the international, national, state, and local drug trafficking organizations that are having the most significant impact on America. This goal does not provide any quantitative measures such as a percentage of drug trafficking organizations that the DEA plans to identify, target, investigate, disrupt, and dismantle. In addition, the goal is open-ended in that it does not provide a timeframe in which the DEA plans to meet this goal. An example of a strategic goal for the DEA that would meet the requirements of GPR and OMB Circular A-11 might be to target, investigate, disrupt, and dismantle a certain percent of the most significant international, national, state, and local drug trafficking organizations by a certain year.

We also found that the DEA's strategic objectives were not quantitative, directly measurable, or assessment-based. For example, the DEA's strategic objective number 3 is to dismantle those domestic

⁹ At the exit conference, the DEA informed us that it was unable to incorporate language to address terrorism in the final FY 2002-2007 Strategic Plan but stated it is drafting the FY 2003-2008 Strategic Plan and will incorporate terrorism language into this plan.

organizations that are directly affiliated with international cartels. Again, this objective does not provide any quantitative measures such as a percentage of organizations that the DEA plans to dismantle, and it does not provide a timeframe in which the DEA plans to meet this objective. As such, the DEA's strategic goal and objectives were not adequate to allow for a future assessment of whether they were being achieved, as required by GPRA and OMB Circular A-11.

After we issued the draft report, the DEA informed us that it has revised its strategic plan since we completed our audit fieldwork. The DEA updates its 6-year strategic plan annually. At the time of our audit fieldwork, the DEA had completed its FY 2001-2006 Strategic Plan. We found that the goal and objectives in the DEA's FY 2001-2006 Strategic Plan were not quantitative, directly measurable, or assessment based. Subsequent to the exit conference for the audit, the DEA informed us that it was then drafting its FY 2003-2008 Strategic Plan to address these shortcomings. In response to a draft of this audit report, the DEA stated that it has drafted its FY 2003-2008 Strategic Plan to include a general long-term goal and four strategic goals with 2-year and 5-year quantitative, time-specific objectives, which it believes will address some of the recommendations in this report. The DEA also stated that these new goals and objectives meet the requirements of GPRA and OMB Circular A-11. The DEA stated that the revised Strategic Plan would be provided to the Office of the Inspector General upon approval of the plan.

We believe the DEA's actions to revise its goal and objectives in the FY 2003-2008 Strategic Plan, partly in response to this audit, are positive steps towards improving the DEA's ability to measure achievement of its goals and objectives. Once we receive the DEA's FY 2003-2008 Strategic Plan, we will evaluate the adequacy of the DEA's revised goals and objectives and provide feedback to the DEA.

Recommendation

We recommend the DEA:

1. Establish a strategic goal and objectives that are quantitative, directly measurable, or assessment-based to allow for a future assessment of whether the goal and objectives are being achieved. The strategic goal and objectives should contain measurable aspects such as a percentage of organizations to be disrupted or dismantled and milestones for accomplishing the goal and objectives.

Development of Performance Indicators

In its FY 2003 budget request, the DEA had not identified performance indicators and performance results for all its decision units.¹⁰ According to OMB Circular A-11, the annual performance plan must include a performance goal or indicator with quantifiable results for each decision unit included in the budget. To determine whether the DEA had established performance indicators and reported performance results for each of its decision units, we reviewed the annual performance plan contained in the DEA's FY 2003 congressional budget request and interviewed DEA officials to discuss the sources of information reported in support of the budget. As shown in the following table, in its FY 2003 budget request the DEA had not: 1) reported performance indicators for 7 of the 11 decision units listed in its request, and 2) reported performance results for 2 of the 4 decision units with performance indicators.

DEA FY 2003 Performance Plan Data

Decision Unit	Performance Indicators Included in Plan	Performance Results Included in Plan
Domestic Enforcement	Yes	Yes
Foreign Cooperative Investigations	No	N/A
Drug and Chemical Diversion Control	Yes	No
State and Local Task Forces	Yes	Yes
Intelligence	No	N/A
Laboratory Services	No	N/A
Training	No	N/A
Research, Engineering, and Technical Operations	No	N/A
Automated Data Processing	No	N/A
Management and Administration	No	N/A
Diversion Control Fee Account	Yes	No

Source: DEA's FY 2003 Congressional Budget Request

In its FY 2004 budget request, the DEA reduced its decision units from 11 to 4 at the direction of JMD and included performance indicators for all 4 decision units. JMD instructed the DEA to reduce the number of decision units to provide a better linkage between its strategic plan and its budget. As shown in the following table, the DEA reported six performance indicators for its four decision units.

¹⁰ Because agency budget requests are prepared well in advance of the fiscal year they fund, the budgets contain actual performance results for the period two fiscal years prior to the budget year. Consequently, an agency's FY 2003 budget includes actual performance results for FY 2001 and its FY 2004 budget contains actual performance results for FY 2002.

DEA FY 2004 Performance Plan Data

Decision Unit	Performance Indicators
Domestic Enforcement	Number of priority target organizations disrupted/dismantled Contribution to reduction in drug use and availability
International Enforcement	Number of priority target organizations disrupted/dismantled Contribution to reduction in drug use and availability
Diversion Control	Number of suppliers disrupted/dismantled
State and Local Assistance	Contribution to reduction in drug use and availability

Source: DEA's FY 2004 Congressional Budget Request

Two of the performance indicators (contribution to reduction in drug use and availability and number of suppliers disrupted/dismantled) were newly reported in the FY 2004 budget request. Even though the latter performance indicator was new, the DEA reported performance results in the FY 2004 budget request for this indicator because the DEA had been collecting such data. However, the DEA had not reported performance results for the other new performance indicator because it had yet to develop a methodology for how to collect this performance data.

Recommendation

We recommend the DEA:

2. Ensure that performance results are included in the budget requests for all performance indicators.

Criteria to Define a Priority Target Organization

The DEA used disruption and dismantlement of priority target organizations as the baseline for measuring its success. The DEA generally defined priority target organizations as drug trafficking organizations for which investigations have the potential to achieve disruption or dismantlement at the highest level of the organization and to provide the greatest potential impact on the reduction of illicit drugs. However, the DEA Headquarters had not established specific criteria for determining what constitutes a priority target organization. As a result, field divisions were not consistent in how they determined whether an organization was a priority target.

To determine the criteria the DEA used to select its priority targets, we obtained a list of the 726 FY 2001 priority target organizations identified by

the DEA. From the list, we selected five field divisions (Atlanta, Chicago, Los Angeles, New Orleans, and New York) to verify the priority target performance data reported. The five field divisions accounted for 248 of the 726 priority target organizations. We interviewed the Special Agents-in-Charge (SAC) at the five field divisions to obtain their feedback on the use of priority targets as the DEA's source for measuring performance, and we interviewed DEA personnel to determine the criteria used to establish the 248 priority targets. While all five SACs rated the use of priority targets as a good to excellent source of measuring performance, they also believed that the field divisions were not consistently identifying and reporting priority target performance data.¹¹ Our audit work confirmed the inconsistencies.

As detailed in Appendices 4 through 8, our audit determined that both within and between each of the five field divisions the criteria used by DEA personnel to select priority target organizations varied. For example, in the Atlanta field division, we interviewed 18 staff [Group Supervisors, Resident Agents-in-Charge, and Assistant Special Agents-in-Charge (ASAC)] and determined they used a total of 19 different reasons for selecting an organization as a priority target. We found that some individuals in the Atlanta field division used as many as 6 of the 19 reasons for selecting a priority target while other individuals used as few as one. In addition, we found that the primary reason for selecting priority target organizations varied between field divisions. For example, the Atlanta field division's primary reasons for selecting priority target organizations was volume of drugs and level of impact on the community, while the Chicago field division's primary reasons was national/international trafficking and whether the organization was part of an Organized Crime Drug Enforcement Task Force operation.

A DEA Headquarters official stated that specific criteria for identifying priority targets had not been established because the DEA's efforts had been focused on establishing performance indicators first and then the DEA would concentrate on identifying and correcting any problems associated with the selection and reporting of priority target data. In its FY 2004 congressional budget request, the DEA reported that it was in the process of establishing criteria for the selection of priority target organizations. In November 2002, the DEA formed a committee of ASACs to develop the criteria. Once the committee develops the criteria, it will be submitted to the SAC Advisory Board for approval. At the time we drafted this report, the DEA had not finalized the criteria for selecting priority target organizations.

¹¹ See Appendix 2 for the SACs' responses to our questions related to the use of priority targets for measuring performance.

Recommendation

We recommend the DEA:

3. Establish specific criteria for determining what constitutes a priority target organization.

Criteria to Define a Disrupted or Dismantled Priority Target Organization

The DEA used disrupted and dismantled priority target organizations as the primary performance indicator to measure its success. The DEA defines a disrupted priority target organization as an organization whose normal effective operation is significantly impacted so that it is unable to conduct criminal operations for a significant period of time. The disruption must be the result of an affirmative law enforcement action, including but not limited to the arrest, indictment, and conviction of the organizational leadership or a substantial seizure of the organization's assets. The DEA defines a dismantled priority target organization as an organization that is incapacitated and no longer capable of operating as a coordinated criminal enterprise. The dismantlement must be the result of an affirmative law enforcement action, including but not limited to the arrest, indictment, and conviction of all or most of its principal leadership, the elimination of its criminal enterprises and supporting networks, and the seizure of its assets. To be considered dismantled the organization must also be impacted to the extent that it is incapable of reforming. However, the DEA had not established specific criteria beyond the general description to define what constitutes a disrupted or dismantled priority target organization, thereby leaving the definitions subject to interpretation by the field divisions. As a result, our audit determined that the field divisions were not consistent in how they determined whether a priority target organization was disrupted or dismantled.

To determine the criteria used to decide whether a priority target organization should be classified as disrupted or dismantled, we identified organizations listed as being disrupted and dismantled and interviewed DEA personnel involved with classifying the organizations. We determined that of the 726 FY 2001 priority targets identified by the DEA, the DEA reported 50 as being disrupted and 50 as being dismantled. We obtained a list of these 100 priority target organizations and identified 41 of the 100 as being from the five field divisions included in our review. We then interviewed DEA personnel at these locations to determine the criteria used to classify the organizations as either disrupted or dismantled.

As detailed in Appendix 9, our audit determined that both within and between each of the five field divisions, the criteria used by DEA personnel to classify the priority target organizations as either disrupted or dismantled varied. For example, in the New York field division, the fact that members of a large organization were arrested was used to classify one priority target organization as disrupted and another priority target organization as dismantled. In other examples, the New Orleans field division classified an organization as dismantled based on the fact that the leader and couriers of an organization responsible for the distribution of cocaine were arrested while the Los Angeles field division classified an organization as disrupted based on the fact that the leaders and couriers of an organization responsible for the distribution of cocaine and marijuana were arrested. To further illustrate differences between field divisions, the New Orleans and Los Angeles field divisions' primary reason priority target organizations were classified as dismantled was because the leader or leaders of an organization responsible for the distribution of drugs were arrested, while the New York field division's primary reason was because a member or members (not necessarily a leader) of a large organization responsible for the distribution of drugs were arrested. A DEA official stated that they plan to address these inconsistencies in the third or fourth quarter of FY 2003.

Recommendation

We recommend the DEA:

4. Establish specific criteria to define what constitutes a disrupted and dismantled priority target organization.

Systems to Collect, Track, and Report Performance Data

To determine whether the DEA had developed an effective system to collect, track, and report performance data, we interviewed DEA officials and reviewed PTARRS data and PTARRS training manuals. We determined that the DEA had not developed a system to effectively track performance data for five of its six performance indicators as shown in the following table.

Decision Unit	Performance Indicator	System Developed
Domestic Enforcement	Number of priority target organizations disrupted/dismantled	Yes
	Contribution to reduction in drug use and availability	No
International Enforcement	Number of priority target organizations disrupted/dismantled	No
	Contribution to reduction in drug use and availability	No
Diversion Control	Number of suppliers disrupted/dismantled	No
State and Local Assistance	Contribution to reduction in drug use and availability	No

Number of Priority Target Organizations Disrupted/Dismantled (Domestic Enforcement Decision Unit). From our interviews and review of the PTARRS training manuals and system data, we determined that the DEA formerly tracked its priority target performance indicators and results for its domestic enforcement operations manually through the use of a spreadsheet application program. Because the manual tracking system was labor intensive and time consuming, the DEA developed the PTARRS to replace the manual process. We found that the PTARRS provides an effective capability to track the progress made and resources expended against priority target organizations.

Number of Priority Target Organizations Disrupted/Dismantled (International Enforcement Decision Unit). The DEA tracked its international priority target organizations through a manual spreadsheet application program instead of the PTARRS. Because the manual system is time consuming and labor intensive, the DEA plans to incorporate features into PTARRS to enable tracking of the international priority target organizations. According to a DEA official, the DEA is awaiting funding to modify PTARRS to incorporate the international priority target performance data. This expansion of PTARRS has been delayed because PTARRS is accessible only through the DEA's primary data processing system called Firebird. Most DEA international offices gained access to the Firebird system by March 2003; however, at that time Moscow, Beijing, Peshawar, and Lyon still needed access to the Firebird system. The installation of the Firebird system in these four remaining offices has been delayed because of security and other issues. To minimize the time and labor involved with tracking international priority target data manually, the DEA

should begin using PTARRS to track international performance data as soon as the obstacles mentioned above are removed.

Contribution to Reduction in Drug Use and Availability (all three decision units) and Number of Suppliers Disrupted/Dismantled (Diversion Control Decision Unit). The DEA tracked performance data for one of its two new performance indicators – suppliers disrupted and dismantled – using a manual spreadsheet application program. However, for the other new performance indicator on contributing to the reduction in drug use and availability, the DEA had not developed a methodology for measuring success. Without a methodology, we could not determine whether meaningful performance data would be available to effectively measure performance against this indicator. Moreover, the DEA had not developed a reporting system for either of these two new performance indicators. Without a reporting system, we could not determine whether any performance data accumulated would be reported in a meaningful way.

Recommendation

We recommend the DEA:

5. Establish a system or systems to collect, analyze, and report performance data related to the performance indicators for: a) suppliers disrupted and dismantled, b) contribution to reduction in drug use and availability, and c) international priority target organizations disrupted and dismantled.

Procedures to Verify Performance Data

The DEA had not established procedures to verify the priority target performance data for all its performance indicators. To verify the priority target performance data, we obtained the PTARRS training manual and reviewed the procedures for tracking investigative cases. In addition, we had DEA field division personnel demonstrate the system controls, as well as how they ensure the priority target information reported in PTARRS is complete and accurate. We also interviewed DEA officials to discuss the sources of information reported in support of its budgets and reviewed the accreditation package¹² that was used to evaluate the PTARRS. From the accreditation documentation, we found that the DEA had evaluated the risks

¹² Accreditation is a formal declaration by a designated accrediting authority that an information technology system is approved to operate in a particular security mode using a prescribed set of safeguards.

and controls in place within the system. Our review determined that the PTARRS application was certified and accredited by the Information Security Section of the DEA's Office of Security Programs as having adequate controls for reporting and tracking priority target organizations with certain minor conditions that were to be resolved by September 12, 2002. Because the contract for upgrading PTARRS had yet to be completed, the DEA was granted two 6-month extensions through September 12, 2003, to complete the action items in the accreditation package.

We also found that the DEA's PTARRS application, its system controls and cross checking methods with other systems, and the procedures instituted by the DEA for case review were generally adequate to verify the domestic priority target performance data. However, as previously mentioned, PTARRS was not used to track performance data for the international priority targets or for the two new performance indicators on suppliers disrupted/dismantled and contribution to reduction in drug use and availability. As a result, the DEA is unable to verify the accuracy and reliability of the information recorded, reported, and used to evaluate its performance for these three indicators. According to a DEA official, once the two new FY 2002 performance indicators and the Office of International Operations' international priority target organizations are brought into the PTARRS reporting system, procedures will be established to ensure the performance results are valid. After we issued the draft report, the DEA informed us that it would modify PTARRS to include all international priority target organizations by the end of FY 2004.

Recommendation

We recommend the DEA:

6. Establish procedures and controls to verify the performance data reported for the performance indicators for: a) suppliers disrupted and dismantled, b) contribution to reduction in drug use and availability, and c) international priority target organizations disrupted and dismantled.

Accuracy of Performance Data

As previously discussed, prior to the implementation of PTARRS the DEA tracked priority target organization data using a manual spreadsheet application. To examine the accuracy of the priority target performance data reported for the five DEA field divisions, we determined that the field divisions accounted for 248 of the 726 FY 2001 priority target organizations listed in the DEA's manual spreadsheet application. We then reviewed the case files and physically verified that 128 of the 248 priority target

organizations were priority targets managed by the field divisions included in our review. For the remaining 120 priority targets managed by sub-offices of the field divisions reviewed, we obtained a signed certification from the respective sub-office official that the organizations were in fact priority target organizations.

To assess the accuracy of the disrupted and dismantled priority target performance data reported for the five DEA field divisions, we first determined that the field divisions accounted for 41 of the 100 FY 2001 disrupted or dismantled priority target organizations in the manual spreadsheet application. We then discussed the respective priority target organizations with the case agents or group supervisors to confirm whether the priority target organizations were disrupted or dismantled, the outcome of the priority target investigations, and the impact the priority target organizations had on drug distribution in the United States. We also had the case agents and group supervisors provide details from the case files of the results of the investigations to include the number of individuals arrested and convicted and the assets seized. Our review determined that the performance data reported for 38 of the 41 FY 2001 disrupted and dismantled priority target organizations listed in the manual spreadsheet application was accurate. However, for the Los Angeles field division, the DEA did not properly report data for 3 of the 28 disrupted and dismantled priority target organizations (5 disrupted and 23 dismantled) reported. Specifically:

- One case was reported as dismantled but we found that this target was never a priority target and was erroneously entered in PTARRS with an incorrect case number but a correct case name.
- Another case was reported as a disrupted Los Angeles field division priority target but actually was a New York field division linked case. The DEA's records show the case was not a priority target in FY 2001, but was linked to a case that was a priority target organization.
- Another case was reported twice as disrupted. However, according to the DEA's records one of these two cases had the wrong case number and name.

The DEA discovered and corrected these three errors when it reconciled the manual spreadsheet data and the PTARRS data in April 2002 when PTARRS was brought online. In addition, as previously discussed we found that the PTARRS system controls and cross-checking methods were adequate to verify the domestic priority target data. Therefore, we make no recommendation regarding this issue.

Goals for Priority Target Organizations and for Disruptions and Dismantlements

Because the DEA had not established specific criteria for identifying priority target organizations and for determining whether the organizations have been disrupted or dismantled, the performance goals established by the DEA may not be useful. In addition, the DEA also had not established reasonable goals for priority target organizations identified and priority target organizations disrupted and dismantled. To determine if the DEA established reasonable performance goals, we reviewed actual and planned priority target performance data reported in the DEA's budget requests for FYs 2003 and 2004. As shown in the following table, we determined that the DEA has not established reasonable goals for the number of priority target organizations that it would identify each year or for the number of priority target organizations that it would disrupt or dismantle each year.

Fiscal Year	Priority Target Organizations Identified		Priority Target Organizations Disrupted or Dismantled	
	Planned	Actual	Planned	Actual
2001	538	566	27	100
2002	588	764	35	190
2003 ¹³	638	424	45	260

Source: DEA Congressional Budget Requests for FY 2003 and FY 2004

As shown in the preceding table, each year the DEA reported disrupting and dismantling about four times or more organizations than it had planned. As such, the DEA was significantly understating this goal. A DEA Headquarters official stated that the goals were significantly understated because the DEA wanted to be cautious when setting its goals until the field divisions were reporting consistent data. The official said the goals were later modified upward but were still tempered because of the potential impact that standardized criteria for selecting priority targets and for classifying priority targets as disrupted or dismantled could have on the projected goals. According to the same official, the DEA was concerned that restrictive standardized criteria could impact the goals downward. Nevertheless, in order to credibly measure its success, the DEA needs to develop reasonable goals on the number of priority target organizations that

¹³ The actual numbers for FY 2003 are estimates based on the actual numbers as of March 31, 2003. As of March 31, 2003, the DEA had identified 212 priority target organizations for FY 2003. If this rate continues, we estimate the DEA will report 424 priority target organizations as identified in FY 2003. As of March 31, 2003, the DEA had disrupted or dismantled 130 priority target organizations. If this rate continues, we estimate the DEA will report 260 priority target organizations as disrupted or dismantled in FY 2003.

it expects to identify each year, as well as the number of priority target organizations that it expects to disrupt or dismantle each year.

Recommendation

We recommend the DEA:

7. Establish goals consistent with a trend analysis of actual performance results.

Conclusion

Although the DEA had developed a strategic goal and objectives in concert with the Department's strategic goals and objectives, it failed to meet key aspects of GPRA and OMB Circular A-11. Specifically, we determined that the DEA's strategic goal and objectives were not adequate to enable future measurements of success, and the DEA had not:

- reported performance results for all its performance indicators;
- developed specific criteria for the field divisions to designate organizations as priority target organizations;
- developed specific criteria for field divisions to report priority target organizations as being disrupted or dismantled;
- established an effective system to collect, analyze, and report performance data for all its performance indicators;
- established procedures and controls to verify the performance data for all its performance indicators;
- established procedures to ensure priority target performance data reported by the field divisions is correct before including the data in its budget; and
- developed reasonable goals for its performance measures.

The DEA needs to effectively address these issues to ensure that its reported performance results provide the Department, Congress, and the public meaningful data to measure how well the DEA is accomplishing its mission.

STATEMENT OF COMPLIANCE WITH LAWS AND REGULATIONS

We audited the Drug Enforcement Administration's (DEA) implementation of the Government Performance and Results Act (GPRA) of 1993. The audit covered the period October 1, 2000, through May 28, 2003, and included a review of selected activities and transactions. The audit was conducted in accordance with generally accepted Government Auditing Standards.

In connection with the audit and as required by the standards, we reviewed procedures, activities, and records to obtain reasonable assurance about the DEA's compliance with laws and regulations that, if not complied with, we believe could have a material effect on program operations. Compliance with laws and regulations is the responsibility of the DEA's management.

Our audit included examining, on a test basis, evidence about laws and regulations that related to the DEA's implementation of the GPRA. The specific laws and regulations for which we conducted tests were:

- Government Performance and Results Act of 1993
- Office of Management and Budget Circular A-11

Except for instances of non-compliance identified in the Finding and Recommendations section of this report, the DEA was in compliance with the laws and regulations referred to above. With respect to those transactions not tested, nothing came to our attention that caused us to believe that the DEA was not in compliance with the referenced laws and regulations above.

OBJECTIVES, SCOPE AND METHODOLOGY

Our objectives were to evaluate whether the Drug Enforcement Administration (DEA) had: 1) developed an adequate strategic goal and objectives that were consistent with the Department's strategic goals and objectives, 2) established performance indicators for all the decision units included in its budget requests, and 3) established an effective system of controls to collect, analyze, and report data related to its performance indicators. We conducted our audit in accordance with Government Auditing Standards and included such tests as were considered necessary to accomplish our objectives. Our audit concentrated on, but was not limited to, the period October 1, 2000, through May 28, 2003.

We performed audit work at the DEA Headquarters in Washington, D.C. and at its field divisions in Atlanta, Chicago, Los Angeles, New Orleans, and New York. At these locations, we determined if the:

- DEA had developed an adequate strategic goal and objectives. To perform this test, we obtained the DEA's FY 2001-2006 Strategic Plan and proposed FY 2003-2008 Strategic Plan and the Department's FY 2001-2006 Strategic Plan. We then compared the strategic goal and objectives in the DEA's plan to the strategic goals and objectives in the Department's plan to ensure the DEA's goal and objectives were consistent with those of the Department. We also reviewed the DEA's goal and objectives to determine if they were quantitative, directly measurable, or assessment-based as required by Office of Management and Budget Circular A-11 to allow for a future assessment of whether the goal and objectives were being achieved.
- DEA had developed performance indicators for each decision unit included in its budget requests. To perform this test, we obtained the DEA's FY 2003 and FY 2004 budget submissions. We then reviewed the budgets to determine if the DEA reported performance indicators for the decision units included in the budget requests and reported performance results for each performance indicator.
- DEA established specific criteria for the selection of priority targets. To complete this test, we interviewed the responsible DEA personnel for the 248 FY 2001 priority target organizations reported for the five field divisions we reviewed to determine what criteria they used to establish the organizations as priority targets. We also

interviewed DEA Headquarters officials to determine whether they had issued criteria for selecting priority targets.

- DEA established specific criteria to decide whether a priority target organization should be classified as disrupted or dismantled. To complete this test, we interviewed the responsible DEA personnel for the 41 FY 2001 priority target organizations reported as disrupted and dismantled for the five field divisions we reviewed to determine what criteria they used to classify the organizations as either disrupted or dismantled. We also interviewed DEA Headquarters officials to determine whether they had issued criteria for classifying priority target organizations as either disrupted or dismantled.
- DEA had developed an effective system to collect, track, and report performance data related to its performance indicators. To perform this test, we interviewed officials from the DEA and reviewed the PTARRS training manuals and the system data from the PTARRS and manual spreadsheet applications used to collect, track, and report performance data related to its performance indicators. We then requested that the DEA field division personnel log into the PTARRS application to demonstrate the system controls, as well as how they ensure the priority target information reported in PTARRS is complete and accurate.
- DEA had established procedures to verify the data related to its performance indicators. To perform this test, we reviewed the user guide and training manuals and reviewed the controls and procedures in place for tracking investigative cases in PTARRS. We then requested the DEA field division personnel log into the PTARRS application to demonstrate the system controls, as well as how they ensure the priority target information reported in PTARRS is complete and accurate. We also obtained the accreditation package that was used to evaluate the PTARRS to determine if the DEA had evaluated the risks and controls in place within the system.
- DEA accurately reported priority target performance data for FY 2001.¹⁴ To perform this test, we obtained the list of FY 2001 priority target organizations entered into the DEA's manual spreadsheet application. The DEA identified 726 FY 2001 priority

¹⁴ Because agency budget requests are prepared well in advance of the fiscal year they fund, the budgets contain actual performance results for the period two fiscal years prior to the budget year. Consequently, an agency's FY 2003 budget includes actual performance results for FY 2001 and its FY 2004 budget contains actual performance results for FY 2002.

targets. From that list, we identified the 248 FY 2001 priority target organizations associated with five selected field divisions (Atlanta, Chicago, Los Angeles, New Orleans, and New York). We then either physically verified the priority target organizations to the case files (for priority target organization investigations managed by the field division visited) or requested that the respective field division sub-office certify the priority target organizations investigated as priority targets (for priority target organization investigations managed by the field division sub-offices) to determine the reliability and accuracy of the performance data reported in the PTARRS. In addition, we obtained the list of FY 2001 disrupted and dismantled priority target organizations reported in the manual spreadsheet application for the same five selected field divisions. The DEA identified 100 priority target organizations disrupted and dismantled in FY 2001. From that list, we identified 41 disrupted or dismantled priority target organizations in the five selected field divisions. We then interviewed the DEA personnel responsible for investigating those organizations to confirm whether those targets were disrupted or dismantled, and to determine the impact the targets had on the United States. We also had the DEA personnel provide details from the case files of the outcome of the investigations such as the number of individuals arrested and convicted and the assets seized.

- DEA established reasonable priority target goals in its FY 2003 and FY 2004 congressional budget requests. To complete this test, we reviewed the actual and planned priority target performance data reported in the DEA's budget requests. We then interviewed DEA personnel to discuss the bases for those goals to determine if the DEA's performance goals were reasonable.

**SUMMARY OF
SPECIAL AGENT-IN-CHARGE
QUESTIONNAIRE RESULTS¹⁵**

1. How would you rate the use of priority target organizations as a source of measuring performance (Poor, Fair, Good, Excellent)? Explain your rating?

Response 1: Good.

Response 2: Good. The Drug Enforcement Administration's (DEA) success involved using priority targeting in combination with wiretaps, the Special Operations Division (SOD), and information and cooperation with State and local police and multi-jurisdictional investigations.

Response 3: Excellent. The DEA has successfully connected priority targeting with the use of wiretaps, the Special Operations Division (SOD), multi-jurisdictional investigations, and State and local programs.

Response 4: Excellent. The Priority Target Resource and Reporting System (PTARRS) has enhanced the DEA's systems of reporting performance and encourages the input from the various field divisions.

Response 5: Good to Excellent. Agent man-hours were also critical to the measurement.

2. Assuming that priority targets are the best way to measure the DEA's performance, how can this system be enhanced to provide a better reflection of the DEA's performance, while also allowing you the flexibility to deal with other issues that may arise in the office?

Response 1: Standards or required elements should be developed for priority target organizations and every priority target organization in the respective field division should be evaluated against those standards or elements. The organizations could then be categorized based on how

¹⁵ During the survey phase of the audit, we conducted site work at one field division and our interview with the Special Agent-in-Charge (SAC) was limited to questions 1 and 2. During the verification phase of the audit, we interviewed the SACs in four other field divisions concerning those same two questions as well as additional questions 3 through 12. As a result, there are five responses for questions 1 and 2, and four responses for questions 3 through 12.

they stack up against those standards. Organizations meeting the most or all the elements would be submitted as priority target organizations and would receive the greater case agent work load, while the remaining agents would continue to develop the cases that had not met all the required elements to qualify as a priority target. This would also provide the SACs the flexibility to work other assignments. The DEA should develop: 1) guidelines for the number of agents that should generally be assigned to a priority target, and 2) a goal of priority target organizations that each field division should disrupt and dismantle in a fiscal year based on location and staffing of the field division.

Response 2: Dismantlements are not the only way to measure success. The PTARRS needs to reflect effort. Wiretaps may go on for a long time before sufficient information is obtained that results in arrests. Also, leads may be passed on to other offices or jurisdictions.

Response 3: In order for the field division management to have the ability to see the "big picture" (manage resources and provide a better reflection of the DEA's performance), data fields need to be established in the PTARRS to identify drugs seized, wiretaps set-up, leads passed to other sub-offices or other field divisions that result in cases, number of arrests, resources (funding), and justification for the priority target (such as threat posed by organization, leadership of the organization, investigative activity to date, and anticipated investigative activity).

Response 4: A better means of tracking man-hours on a given priority target organization will provide more flexibility to work other cases and offer assistance to other offices.

Response 5: Additional resources would result in better performance.

3. Does the use of priority target organizations as a source of measuring performance provide an accurate view of the DEA's success at accomplishing its mission? Explain?

Response 1: No, not completely. Some harder to measure results should also be counted as accomplishments. For example, if a local drug gang is put out of commission and driven out of a neighborhood, the relief and feelings of safety for the residents should be counted as a positive result. By eliminating a bad influence in a neighborhood, younger children have more opportunity to learn better values and see better adults as models to emulate. If children only see drug dealers driving big fancy cars, that is who they will imitate.

Response 2: Yes. That is the DEA's focus and mission.

Response 3: Yes. Priority targeting provides an accurate view of the DEA's success because the field divisions have greater participation and everyone is a player. For example, the DEA's use of the Class 1 system offered a very rigid definition of a Class 1 violator. Small offices and locations would never have a Class 1 case, which would result in the DEA having a less accurate measure of performance from all entities. The priority targeting system offers a much greater degree of participation, which in the end provides a more accurate picture of performance.

Response 4: Yes. In order to show the impact of the results, priority targets should be the priority.

4. Does the use of priority target organizations provide an effective means of communicating case linkages? Why or why not?

Response 1: Yes. The DEA field divisions and other police forces now share information and work together to connect the dots of drug connections to other parts of the country and the world.

Response 2: Yes. In concert with the Organized Crime Drug Enforcement Task Force (OCDETF) operations and the SOD, priority target organizations provide and encourage an effective case linkage system.

Response 3: Yes. A lot of the information given to the SOD on priority target organizations has provided linkages to both Federal Bureau of Investigations (FBI) and United States Customs situations.

Response 4: Yes. We are beginning to look at the case linkage. In addition, the Consolidated Priority Organization Target list, OCDETF, and non-OCDETF sources have assisted with case linkages.

5. How has the use of priority targets as a performance measurement improved the interaction among the field offices as related to providing leads to cases?

Response 1: It has forced the field divisions to share leads in order to determine how drug dealers are connected and how the drugs move from overseas to this country and then to various locations for ultimate sale. The field divisions are working better as a team. The SOD sends leads to field divisions and the field divisions work the leads and share

the information with other field divisions when the drug connections lead to the other division.

Response 2: Priority targets coupled with the intelligence and resources of the SOD have forced the field divisions to focus and work together for the common cause of taking down the most significant drug trafficking organizations. For example, in the past, one field division may provide a lead on a priority target organization to another field division. The field division that received the priority target lead may just make note of that particular lead instead of looking at how that lead may be used to develop another priority target or aid in dismantling or disrupting the priority target organization from the field division that provided the lead.

Response 3: The case linkage feature in the PTARRS has offered added value to the communication level between the field divisions. Also, there is an added bonus in that the PTARRS rejects cases when links are entered twice, which prompts the field divisions to interact with each other for information on the cases.

Response 4: Priority targets have helped the existing relationship between the field divisions.

6. Are priority target organizations selected in sub-offices that would not otherwise be selected as a priority target in the field division? If so, why?

Response 1: Yes. Some cases have a great local impact, but are not priority targets. The DEA cannot ignore a bad situation merely because it does not have immediately identifiable international connections. Each city has its own unique problems. We cannot fail to fund local drug cases just because they are not OCDETF cases.

Response 2: No. Priority target organizations in sub-offices have an essential role in meeting the DEA's mission. Major drug trafficking organizations are not always identified in the major metropolitan cities and disrupted or dismantled from the top of the organization and then working down to the distribution level. Many investigations begin in the rural DEA sub-offices where major drug trafficking organizations are infiltrated through the smaller street level dealers.

Response 3: It would be hard to make the distinction simply because of the differences in locations. Each field division is allowed to seek the biggest organization in their respective area.

Response 4: The SAC provided no answer to this question.

7. What areas of weaknesses do you see in the use of priority targets?

Response 1: By focusing the DEA's assets on priority targets, there are less resources available for other cases, such as local targets. Money from special funds such as paying for evidence and information is now going to priority targets.

Response 2: If the field division managers and Headquarters do not use seized drugs, wiretaps set-up, leads passed to other field divisions, and number of arrests in combination with priority target organizations dismantled and disrupted, then priority targets will not be an effective tool to manage resources and demonstrate the DEA's performance not only within the DEA, but also to Congress.

Response 3: The perception of outside agencies such as the United States Attorney's office, sheriff's departments, and police departments relative to the understanding of priority targeting is that they will not get assistance from the DEA because of the focus on priority targets.

Response 4: Because of the SOD funding factor, money should be maintained for non-priority cases. Also, the criteria for establishing priority target organizations should have been marketed better initially.

8. Do resources, ratio of available case agents, the identification and arrest of drug traffickers, etc., have any effect or influence on your selection of priority targets? If so, how?

Response 1: No.

Response 2: No. We focus on the organization and the impact that organization has on the area. Once we identify a priority target, it is always a priority target regardless. The case may be removed from the priority target list at any time, but not because of any of the circumstances mentioned above.

Response 3: Yes. Resources have an effect or influence on the selection of priority target organizations because a field division with 8 agents and 10 task force officers (18 total) would require more man hours that would result in more resources and the ability to work more priority targets. Also, every enforcement element should have at least one priority target, as well as one on the shelf when the other one is

either disrupted or dismantled. In addition, the field division's threat assessment would be the basis for selecting priority targets.

Response 4: Yes. Resources should be considered when you manage priority target organizations as the number increases. You would like to know the status of the existing priority target organizations as you manage your case workload.

9. Do you think that priority targeting, if established and reported consistently among field divisions, could be used as an effective tool to request and bring resources to the areas of most significant trafficking (such as priority targets)? How?

Response 1: Yes. Once we identify the priority targets, then we can demonstrate where the resources are needed. If the number of priority target organizations is greater than our resources, then we can show the need for more resources.

Response 2: Yes. If the DEA field divisions and Headquarters: 1) clearly define what a priority target organization is, 2) develop general standardized criteria for selecting priority target organizations regardless of the area, and 3) consistently apply the definition and criteria, then the DEA can use this information to demonstrate and justify additional resources, especially in those areas of most significant trafficking. What we actually report to DEA Headquarters is: 1) the number of most significant priority target organizations that can be investigated based on the respective field divisions current available resources, and 2) the number (percentage) of additional priority target organizations that could be investigated if we had additional resources. We have an agreement with DEA Headquarters to report priority target organizations based on the aforementioned criteria. We cannot identify priority target organizations by just going through all our case files and categorizing them as either a non-priority target organization or a priority target organization. There are some priority target organizations that can be identified without having the available resources to work the cases (such as name of suspected drug trafficker and wire tap numbers). However, most priority target organizations are identified through case agents working and developing the cases until they can be classified and reported as a priority target organization.

Response 3: Yes. Priority targeting could become an effective tool to request and bring resources if the DEA looked at how many priority target organizations were not worked because of the lack of resources

(agents) and effectively measure the aspect of manpower to priority targets.

Response 4: Yes.

10. As illustrated in the table of statistics (See Appendix 3), why do you think certain field divisions show higher on-board staff, but such a low number and percentage of priority target organizations or vice versa? Are field divisions not reporting all the priority targets? Why?

Response 1: The criteria to select priority target organizations is subjective. Each field division may have differing ideas on what constitutes a priority target. Perhaps field divisions are not reporting all the priority target organizations because of the subjectiveness of the criteria. Some field divisions may under report priority target organizations to show a higher success rate and some may over report priority target organizations to show a need for more resources or to look as if they are working harder.

Response 2: Each field division has a different geographic drug connection (such as gateway for drugs entering and being distributed throughout the United States, and drug storage command centers), as well as a different drug threat. The field divisions are not reporting all their priority targets. However, based on the instructions provided by the DEA Headquarters (as discussed in the previous question), the field divisions are reporting all priority target organizations that can be investigated with the available resources.

Response 3: The statistics illustrate where priority targeting was when the priority targeting concept first came about. The selection of priority target organizations was left to the discretion of the SAC. As such, every SAC selected their priority target organizations differently. There was no set criteria, no formula from headquarters. As the system has evolved, the selection process was revamped. All the field divisions are reporting their priority target organizations because the SACs are being evaluated based on the number of priority target organizations that are being disrupted and dismantled in their respective field division.

Response 4: Initially, there was no established criteria for the priority targets. In some field divisions, sub-offices' cases were reported as priority targets, while the top cases were reported as priority target organizations in the New York field division.

11. Does your field division use or have other performance indicators other than those currently reported that would better measure performance against DEA's overall mission?

Response 1: No.

Response 2: No. However, the DEA should look at other indicators that result from dismantled or disrupted priority target organizations (such as price of drugs, change in drug trafficking patterns, and sources of supply). The DEA should also take into account seizures, arrests, wiretaps set-up, impact on other areas of the country, and leads provided to sub-offices or other field divisions when evaluating DEA's overall performance. Furthermore, the DEA should report each field division's overall caseload for a fiscal year in addition to: 1) the number of most significant priority target organizations that could be investigated in a fiscal year based on the respective field divisions current available resources, and 2) the number or percentage of additional priority target organizations that could be worked if the field division had more resources. The reporting of the overall caseload should provide a more complete and accurate picture of DEA's performance, as well as demonstrate our needs. The field divisions should also have individual goals showing priority target organizations dismantled or disrupted, not just for the DEA overall. Using the threat assessment for each field division, goals could be set, not based on the number of priority target organizations disrupted or dismantled, but by type of organization dismantled or disrupted (such as chemical brokers and cocaine cartels).

Response 3: No.

Response 4: No. However the Field Management Plans identify what priorities are the focus within a division.

12. What better tools could the DEA use to show Congress how well you are performing that would result in more personnel on-board to deal with the increased drug trafficking, distribution, and use of drugs?

Response 1: The SAC could not think of any better tools to show Congress how the DEA is performing, but believed there were some.

Response 2: Reporting the number of priority target organizations dismantled or disrupted in a given year cannot provide the true picture of the DEA's performance. Although the use of dismantled or disrupted priority target organizations is the key performance measure, the DEA

must provide testimonial evidence to Congress with a package of success stories, as well as the statistical data. The statistical data must also provide a complete package of not only organizations dismantled or disrupted, but also drugs seized, wiretaps set-up, number of arrests, and leads passed to other sub-offices or other field divisions that results in cases. The DEA must also do a better job of using the media to inform the public of their work.

Response 3: If the DEA could come up with a way to track the number of priority target organizations they could not work because of other responsibilities. For example, if the Border Patrol does a drug pickup, a DEA agent has to be called and the DEA agent is tied up with the logistics of that particular case. Also, the FBI recently pulled out their agents working within the DEA groups to focus more on terrorism. However, there are not enough DEA agents to fill the void. Both these areas limit the DEA's ability to work more priority targets.

Response 4: Priority targeting is a good way to show Congress the DEA's performance. Other than inviting Congress members to different field divisions, the priority targeting system has credibility with Congress.

**ON-BOARD FIELD DIVISION STAFF
LEVELS AS A PERCENT OF PRIORITY
TARGET ORGANIZATIONS (PTOs)**

Field Division	FY 2001 PTOs	Percent of PTOs to Total PTOs	Average Total On-board Staff for FY 2001¹⁶	Percent of On-board Staff to Total On-board Staff	Percent of PTOs to On-board Staff
Atlanta	39	5.4%	302	5.2%	12.9%
Boston	24	3.3%	222	3.8%	10.8%
Caribbean	24	3.3%	175	3.0%	13.7%
Chicago	23	3.2%	312	5.4%	7.4%
Dallas	16	2.2%	200	3.5%	8.0%
Denver	19	2.6%	170	2.9%	11.2%
Detroit	48	6.6%	270	4.7%	17.8%
El Paso	17	2.3%	159	2.8%	10.7%
Houston	87	12.0%	402	7.0%	21.6%
Los Angeles	92	12.7%	430	7.4%	21.4%
Miami	64	8.8%	598	10.4%	10.7%
Newark	8	1.1%	161	2.8%	5.0%
New Orleans	77	10.6%	243	4.2%	31.7%
New York	17	2.3%	545	9.4%	3.1%
Philadelphia	7	1.0%	198	3.4%	3.5%
Phoenix	40	5.5%	206	3.6%	19.4%
San Diego	9	1.2%	260	4.5%	3.5%
San Francisco	17	2.3%	233	4.0%	7.3%
Seattle	17	2.3%	196	3.4%	8.7%
St. Louis	30	4.1%	213	3.7%	14.1%
Washington, DC	51	7.0%	280	4.9%	18.2%
Total	726		5775		12.6%

Source: OIG calculated percentages based on PTO and on-board data provided by DEA

¹⁶ The average total on-board staff for FY 2001 was calculated by adding the beginning total on-board staff as of October 1, 2000, to the ending total on-board staff as of September 30, 2001, and dividing the resulting sum by two. Total on-board staff includes all positions at the applicable office.

**PRIORITY TARGET CRITERIA USED BY
THE LOS ANGELES FIELD DIVISION
Page 1 of 2**

Group Supervisor #	Volume of Drugs Involved	Area of Drug Distribution	Type of Organization	Type of Dealer Involved	Community/Drug Relationship	Organization's Assets	Drug/Gang Involvement	State/Local Authorities' Involvement	Potential for Other Leads	Complex Conspiracy	Organization's Size	Organization's Level of Violence	OCDETF Case	Input from Informants	Toll Analysis	Networking of an Organization	National/International Trafficking	Organization's Collection of Revenue	Level of Impact on Community	Multi-Jurisdictional Case	Wiretap Case	RICO Law Violators	Total Reasons Used
Group Supervisor # 1	◆		◆								◆						◆						6
Group Supervisor # 2	◆	◆	◆																				3
Group Supervisor # 3	◆		◆								◆		◆										5
Group Supervisor # 4			◆								◆								◆				3
Group Supervisor # 5	◆		◆								◆								◆				4
Group Supervisor # 6			◆								◆								◆				3
Group Supervisor # 7	◆		◆	◆							◆	◆							◆				6
Group Supervisor # 8	◆	◆	◆								◆	◆									◆		6
Group Supervisor # 9				◆																	◆		4
Group Supervisor # 10	◆	◆	◆	◆							◆	◆											6
Group Supervisor # 11	◆	◆	◆	◆							◆	◆											5
Group Supervisor # 12	◆	◆	◆								◆			◆							◆		7
Group Supervisor # 13	◆		◆				◆												◆				6
Group Supervisor # 14	◆	◆	◆									◆							◆				5
Group Supervisor # 15	◆			◆							◆	◆											5
Group Supervisor # 16	◆	◆				◆					◆								◆				4
Group Supervisor # 17	◆	◆																	◆				5
Group Supervisor # 18	◆		◆																				3
SubTotal Responses (Page 1)	15	9	15	5	0	2	1	0	0	0	12	3	2	3	0	1	10	0	6	1	1	0	

**CIRCUMSTANCES OF FISCAL YEAR 2001
DISRUPTED/DISMANTLED PRIORITY TARGET ORGANIZATIONS¹⁷**

NUMBER	PTO STATUS	LOCATION	DESCRIPTION OF CIRCUMSTANCES OF DISRUPTED/DISMANTLED
1	Disrupted	Atlanta Field Division	Two individuals were arrested that were part of a large organization. Both pleaded guilty to the manufacturing and distribution of methamphetamine and cocaine and received 20 year prison sentences. In addition, 13 pounds of methamphetamine, 2 kilograms of cocaine, and more than \$800,000 in cash were seized.
2	Disrupted	Atlanta Field Division	A family organization was arrested that were responsible for the distribution of crack cocaine. In total, 35 individuals were arrested and convicted.
3	Dismantled	Chicago Field Division	Two leaders of an organization were arrested. Individuals were responsible for murders and the distribution of crack cocaine. In total, 79 individuals were arrested and 15 were convicted. In addition, 4 cars, 4.5 kilograms of crack cocaine, \$20,000 in cash, and 56 firearms were seized.
4	Dismantled	Los Angeles Field Division	The leaders and couriers of an organization responsible for the distribution of methamphetamine were arrested. In total, 7 individuals were arrested and convicted. In addition, 7 pounds of methamphetamine, \$80,000 in cash, 8 vehicles, and guns were seized.
5	Dismantled	Los Angeles Field Division	The leaders and suppliers of an organization responsible for the distribution of methamphetamine were arrested. In total, 19 individuals were arrested and 18 were convicted. In addition, 45 pounds of methamphetamine, 300 pounds of marijuana, and \$450,000 in cash were seized.
6	Dismantled	Los Angeles Field Division	The leaders and couriers of an organization responsible for the distribution of cocaine were arrested. In total, 38 individuals were arrested. In addition, 1,298 kilograms of cocaine, 110 pounds of marijuana, \$4.1 million in cash, and 5 weapons were seized.

¹⁷ In the FY 2003 budget, the DEA reported 41 priority target organizations as disrupted or dismantled for FY 2001. However, as discussed in the accuracy of performance data section of this report, the DEA incorrectly reported three organizations as priority target organizations disrupted or dismantled for the Los Angeles field division. As such, this appendix relates to the 38 priority target organizations that the DEA correctly reported as disrupted or dismantled for FY 2001.

7	Dismantled	Los Angeles Field Division	The leaders and couriers of an organization responsible for the distribution of pseudophedrine were arrested. In total, 17 individuals were arrested and 14 were convicted. In addition, 3 million pseudophedrine pills, 484 pounds of methamphetamine, and \$230,000 in cash were seized.
8	Dismantled	Los Angeles Field Division	An international organization's leaders and couriers responsible for the distribution of methamphetamine were arrested. In total, 100 individuals were arrested and 90 were convicted. In addition, methamphetamine and pseudophedrine, \$2 million in cash, and 2 laboratories were seized.
9	Dismantled	Los Angeles Field Division	The leaders and couriers of an organization involved in paying off chemical companies for the gas used in the manufacturing of methamphetamine were arrested. In total, 34 individuals were arrested and 31 were convicted. In addition, 5 vehicles and 16 laboratories were seized.
10	Disrupted	Los Angeles Field Division	The leaders of an international organization responsible for transporting opium were arrested. In total, 5 individuals were arrested. In addition, 3 kilograms of opium, \$5,000 in cash, and 4 vehicles were seized.
11	Dismantled	Los Angeles Field Division	An international organization's leaders and suppliers responsible for distributing cocaine and ecstasy were arrested. In total, 22 individuals were arrested and 17 were convicted. In addition, 800 pounds of ecstasy and a home valued at \$1 million were seized.
12	Dismantled	Los Angeles Field Division	The leaders and couriers of multiple international organizations responsible for distributing cocaine and heroin were arrested. In total, 21 individuals were arrested and 11 were convicted. In addition, 700 pounds of marijuana, 85 kilograms of cocaine, vehicles, and \$500,000 in cash, were seized.
13	Dismantled	Los Angeles Field Division	The international leaders and suppliers of an organization responsible for the distribution of cocaine were arrested. In total, 45 individuals were arrested and 39 were convicted. In addition, 632 pounds of marijuana and 240 kilograms of cocaine were seized.
14	Dismantled	Los Angeles Field Division	The leaders and couriers of an international organization responsible for the distribution of cocaine were arrested. In total, 54 individuals were arrested and the majority were convicted. In addition, 632 pounds of marijuana, 350 kilograms of cocaine, and \$15 million in cash were seized.

15	Dismantled	Los Angeles Field Division	The international leaders and suppliers of a large organization responsible for the distribution of methamphetamine were arrested. In total, 12 individuals were arrested by Federal authorities and a significant number of individuals were arrested by State and local authorities. In addition, 16 laboratories and 75 weapons were seized.
16	Dismantled	Los Angeles Field Division	The leaders of an international organization and suppliers responsible for the distribution of heroin were arrested. In total, 235 individuals were arrested and convicted. In addition, 60 pounds of heroin, \$200,000 in cash, and an orchid farm valued at \$1 million were seized.
17	Dismantled	Los Angeles Field Division	An international organization's leaders and suppliers of Columbian cocaine were arrested. In total, 11 individuals were arrested and convicted. In addition, 80 pounds of marijuana, 29 kilograms of cocaine, \$400,000 in cash, and vehicles were seized.
18	Disrupted	Los Angeles Field Division	The leaders and couriers of an organization responsible for the distribution of cocaine and marijuana were arrested. In total, 3 individuals were arrested. In addition, vehicles were seized.
19	Dismantled	Los Angeles Field Division	An international organization's leader responsible for distributing ecstasy was arrested and convicted. In addition, 5,000 ecstasy pills were seized.
20	Dismantled	Los Angeles Field Division	An international organization's leaders and couriers responsible for the distribution of methamphetamine were arrested. In total, 34 individuals were arrested. In addition, 8 tons of pseudophedrine, \$2 million in cash, and 2 laboratories were seized.
21	Disrupted	Los Angeles Field Division	A local organization's leaders responsible for distributing methamphetamine and cocaine were arrested. In total, 4 individuals were arrested and convicted. In addition, 10 pounds of methamphetamine was seized.
22	Dismantled	Los Angeles Field Division	An international organization's leaders and suppliers responsible for distributing cocaine and ecstasy were arrested. In total, 23 individuals were arrested and 18 were convicted. In addition, 2,200 pounds of ecstasy were seized.
23	Dismantled	Los Angeles Field Division	The international leaders and suppliers of a large organization responsible for the distribution of methamphetamine were arrested. In total, 8 individuals were arrested by Federal authorities and a significant number of individuals were arrested by State and local authorities. In addition, 2 laboratories and 5 weapons were seized.

24	Dismantled	Los Angeles Field Division	The leaders and suppliers of an organization responsible for the distribution of cocaine were arrested. In total, 4 individuals were arrested and convicted. In addition, 80 kilograms of cocaine was seized.
25	Dismantled	Los Angeles Field Division	The leader of an organization responsible for the distribution of pseudophedrine was arrested. In lieu of prosecution, the company president surrendered his license to distribute pseudophedrine. In addition, 2,010 cases of pseudophedrine were seized.
26	Dismantled	Los Angeles Field Division	The suppliers of an organization responsible for the distribution of methamphetamine were arrested. In total, 5 individuals were arrested and 4 were convicted. In addition, 7 pounds of methamphetamine, 3 kilograms of cocaine, 21 cases of pseudophedrine, 1 methamphetamine laboratory, \$72,526 in cash, and 4 vehicles were seized.
27	Dismantled	Los Angeles Field Division	The leaders of an organization responsible for the distribution of heroin were arrested. In total, 20 individuals were arrested and 17 had been convicted. In addition, 5 pounds of heroin, \$7,500 in cash, and 2 vehicles were seized.
28	Dismantled	Los Angeles Field Division	The significant leaders of the organization, as well as the street dealers, responsible for the distribution of crystal methamphetamine were arrested. In total, 31 individuals were indicted and 30 have been arrested and convicted. In addition, 3 pounds of crystal methamphetamine, 200 ecstasy pills, 5 ounces of marijuana, \$244,000 in cash, 7 vehicles, and 9 weapons were seized.
29	Dismantled	New Orleans Field Division	The partner of a large marijuana distribution organization was arrested. In addition, about 463 kilograms of marijuana was seized.
30	Dismantled	New Orleans Field Division	The leader and couriers of organization responsible for the distribution of cocaine was arrested and received life imprisonment. In total, approximately 100 individuals were arrested.
31	Disrupted	New Orleans Field Division	Members of a large organization responsible for the distribution of large amounts of cocaine and methamphetamine in several areas within a given state were arrested. In total, 15 individuals were arrested. In addition, 3 pounds of methamphetamine, 5 kilograms of cocaine, and \$300,000 in cash and real property were seized.
32	Dismantled	New Orleans Field Division	The leader of an organization responsible for the distribution of hydrochloride and marijuana was arrested and received a total of 105 years imprisonment. In total, 9 individuals were arrested. In addition, 6 vehicles were seized.

33	Disrupted	New Orleans Field Division	The leader of an organization responsible for the distribution of a significant amount of heroin within a given area was arrested. In total, 24 individuals were arrested and indicted. In addition, 2 kilograms of heroin and \$100,000 in cash were seized.
34	Dismantled	New York Field Division	The members of an organization responsible for the distribution of heroin, cocaine, and ecstasy were arrested. In total, 17 individuals were arrested and convicted. In addition, 790 kilograms of heroin, 491 kilograms of cocaine, 15,000 ecstasy pills, and about \$666,600 in cash were seized.
35	Dismantled	New York Field Division	The members of a large organization responsible smuggling and distributing large quantities of cocaine into the United States were arrested. In total, 51 individuals were arrested. In addition, \$1.6 million in cash and assets, more than 200 kilograms of cocaine, and 3 tons of marijuana were seized.
36	Dismantled	New York Field Division	The main target of an organization responsible for breaking heroin down and distributing it to smaller dealers on the street was arrested, along with his brother. In total, about 15 to 20 individuals were arrested.
37	Disrupted	New York Field Division	The members of an organization responsible for the distribution of cocaine were arrested as the result of the arrest of a foreign national. In total, 5 individuals were arrested. In addition, 401 kilograms of cocaine was seized.
38	Disrupted	New York Field Division	Two members of a large organization responsible for the distribution of marijuana were arrested at a border crossing. In addition, \$1.8 million in cash and 30 to 40 pounds of marijuana were seized.

**THE DRUG ENFORCEMENT ADMINISTRATION'S
RESPONSE TO THE DRAFT AUDIT REPORT**



U. S. Department of Justice
Drug Enforcement Administration

www.dea.gov

SEP 23 2003

MEMORANDUM

TO: Glenn A. Fine
Inspector General

FROM: *Michelle Bonhart for*
Karen P. Tandy
Administrator

SUBJECT: Comments on the Office of the Inspector General (OIG) Final Draft Audit "The Drug Enforcement Administration's Implementation of the Government Performance and Results Act"

The Drug Enforcement Administration (DEA) has reviewed the Office of the Inspector General (OIG) draft audit report titled *The DEA's Implementation of the Government Performance and Results Act* (GPRA) and provides this response to your July 29, 2003 request for comments. The OIG report reflects the history of DEA's efforts to implement the GPRA and the significant progress that the DEA has made in the past five years. As the OIG noted, the DEA has:

1. developed management plans to help measure program effectiveness and provided organizational accountability for priority performance targets;
2. established performance targets for disrupting and dismantling international and domestic drug trafficking organizations; and
3. developed a system to capture, verify, and validate data on all priority targets.

The OIG conducted its audit from October 2000 through May 2003 and the report discusses actions that the DEA needs to complete to be fully compliant with the GPRA. The audit contained seven recommendations for action by the DEA. As discussed in the exit conference, the DEA had initiated actions that address six of the OIG's recommendations prior to the issuance of this draft. The DEA concurs with all of the OIG's recommendations and is nearing completion on many of the OIG's recommended actions. The Action Plan (attached) provides a current status of completed actions and projected completion dates for implementation of each recommendation.

One of the findings in the report (recommendation one) determined that DEA's strategic goals and objectives were not quantitative, directly measurable, or assessment-based to allow for the future assessment of achievement. This finding was based on DEA's FY 2001-2006 Strategic Plan. DEA's new draft FY 2003-2008 Strategic Plan includes a general long-term goal and four strategic goals with two and five-year quantitative objectives. The new goals and objectives will meet the requirements of GPRA and OMB Circular A-11. On July 17, 2003, the Department of Justice (DOJ)

provided comments to DEA on its draft Strategic Plan. The DEA Strategic Planning Unit integrated DOJ's comments into the Strategic Plan. The target date for approval of this plan is October 2003.

Recommendations two through six, which are also nearing completion, include the development of standard criteria for defining Priority Target Organizations (PTOs) as well as the inclusion of the Office of International Operations' international PTOs into PTARRS. The draft report indicates that DEA has not established a timeline for inclusion of these international targets; this is incorrect. The DEA will modify PTARRS to include all international PTOs by the end of the first quarter of FY 2004. Recommendation seven will require the collection of trend data after the implementation of the first six recommendations. Beginning with the third quarter of FY 2003, the DEA will conduct reviews of actual performance data and compare it to established annual targets. The DEA will continue to conduct these reviews on a quarterly basis and use the information to monitor and improve its performance measures.

The DEA appreciates the opportunity to provide comment to the OIG in these matters. The DEA is committed to the GPRA and will provide status reports to your office until all reported actions are completed.

Attachment

cc: Vickie Sloan, Director
Audit Liaison Office

Action Plan
DEA GPRA Implementation

Recommendations	Actions Taken	Actions Planned	Projected Completion Date	Primary Office
<p><u>Recommendation 1</u> Establish a strategic goal and objectives that are quantitative, directly measurable, or assessment-based to allow for a future assessment of whether the goal and objectives are being achieved. The strategic goal and objectives should contain measurable aspects such as a percentage of organizations to be disrupted or dismantled and milestones for accomplishing the goal and objectives.</p>	<p>Concur. DEA's new draft FY 2003-2008 Strategic Plan meets the requirements of this recommendation; the plan includes a general long-term goal and four strategic goals with two and five-year quantitative, time-specific objectives. The new goals and objectives meet the requirements of GPRA and OMB Circular A-11. On July 17, 2003, the Department of Justice (DOJ) provided comments to DEA on its draft Strategic Plan. The draft Strategic Plan has been revised based on DOJ's revisions and is currently undergoing review.</p>	<p>Provide the revised draft Strategic Plan to the OIG upon final approval.</p>	<p>10/03</p>	<p>ADS</p>
<p><u>Recommendation 2</u> Ensure that performance results are included in the budget requests for all performance indicators.</p>	<p>Concur. Currently, DEA's FY 2004 Budget Request to Congress displays performance information by the following four strategic focus areas, which are defined in DEA's draft FY 2003 – FY 2008 Strategic Plan: International Enforcement, Domestic Enforcement, State and Local Assistance, and Diversion Control. DEA has specific performance indicators for each of the four strategic focus areas with related performance results. At this time, performance results are not available for DEA's general long-term goal of contributing to DOJ's goal to reduce the availability of drugs in America.</p>	<p>Complete the development of an impact assessment methodology in order to demonstrate results on reduction of drug availability.</p>	<p>12/03</p>	<p>FC</p>
<p><u>Recommendation 3</u> Establish specific criteria for determining what constitutes a priority target organization.</p>	<p>Concur. DEA has prepared definitions and specific criteria for what constitutes a PTO. These criteria and definitions are under review and will be included in a new Priority Target Handbook.</p>	<p>Complete the Priority Target Handbook and provide to the OIG upon final approval.</p>	<p>11/03</p>	<p>FC</p>
<p><u>Recommendation 4</u> Establish specific criteria to define what constitutes a disrupted and dismantled priority target organization.</p>	<p>Concur. DEA has prepared definitions and specific criteria for what constitutes disruption/dismantlement. These criteria and definitions are being compiled in the new Priority Target Handbook.</p>	<p>Complete the Priority Target Handbook and provide to the OIG upon final approval.</p>	<p>11/03</p>	<p>FC</p>
<p><u>Recommendation 5</u> Establish systems to collect, analyze, and report performance data related to the performance indicators for: (a) suppliers disrupted and dismantled [for Office of Diversion Control]; (b) contribution to reduction in drug use and availability; and (c) international priority target organizations disrupted and dismantled.</p>	<p>Concur. (a) The Office of Diversion Control has defined "disruption" and "dismantlement" as it pertains to traffickers of illicit drugs and registrant violators and established a methodology to collect, analyze, and report performance data. Raw data used to calculate the number of disruptions are extracted from two separate DEA data systems, the Quarterly Reporting Data Base (QRDB) and Controlled Substances Act (CSA) Data Base, and compiled in an Excel spreadsheet for reporting purposes. Raw data used to calculate the number of dismantlements are extracted and reported directly from the CSA Data Base. (b) Proposals concerning the assessment of DEA's impact on drug availability are under consideration. (c) The decision has been made to incorporate all international priority target organizations into PTARRS. The PTARRS contract has been modified to reflect this additional build.</p>	<p>(a) The Office of Diversion Control is currently evaluating the consolidation of several data systems into one relational interface (CTRANS) which will capture all disruption/dismantlement information. (b) Complete the development of an impact assessment methodology in order to demonstrate results on reduction of drug availability. (c) Modify the PTARRS system to include all international priority target organizations. The DEA will provide additional information to the OIG to demonstrate the modifications to its systems in its next status report.</p>	<p>(a) 12/04 (b) 12/04 (c) 12/03</p>	<p>FC</p>

<p>Recommendation 6</p> <p>Establish procedures and controls to verify the performance data reported for the performance indicators for:</p> <p>(a) suppliers disrupted and dismantled [for Office of Diversion Control];</p> <p>(b) contribution to reduction in drug use and availability, and</p> <p>(c) international priority target organizations disrupted and dismantled.</p>	<p>Concur.</p> <p>(a) OD uses established procedures and controls to verify the performance data reported for disruptions and dismantlements. OD reviews discrepancies, resolves questions from the field, and evaluates inconsistencies prior to data entry into QRDB and CSA. Also, after cases are adjudicated, OD verifies and records the disposition data (civil fines, administrative hearing, arrests, convictions, etc.) and assigns the appropriate administrative (violation) codes to each registration.</p> <p>(b) Proposals concerning the assessment of DEA's impact on drug availability are under consideration.</p> <p>(c) The decision has been made to incorporate all international priority target organizations into PTARRS. The PTARRS contact has been modified to reflect this additional build.</p>	<p>(a) Include existing data verification procedures in any effort to consolidate existing DEA data systems.</p> <p>(b) Include data verification procedures in the resulting impact assessment system.</p> <p>(c) Modify the PTARRS system to include all international priority target organizations. The OIG noted that PTARRS provides an effective capability to track the progress made and resources applied against PTOs.</p>	<p>(a) 12/03</p> <p>(b) 12/04</p> <p>(c) 12/03</p> <p>FC</p>
<p>Recommendation 7</p> <p>Establish goals consistent with a trend analysis of actual performance results.</p>	<p>Concur. Beginning in the third quarter of FY 2003, DEA implemented a quarterly review process for performance data. This entails comparing actual performance data to established annual targets.</p>	<p>Establish methodology to estimate projected performance based on actual data for each performance indicator identified in DEA's four strategic focus areas.</p>	<p>12/04</p> <p>FC</p>

DEA Abbreviation Key	
ADS	Executive Policy & Strategic Planning Staff
FC	Financial Management Division
PTARRS	Priority Target Activity and Resource Reporting System
QRDB	Quarterly Reporting Data Base
CSA	Controlled Substances Act Data Base

**OFFICE OF THE INSPECTOR GENERAL, AUDIT DIVISION ANALYSIS
AND SUMMARY OF ACTIONS NEEDED TO CLOSE THE REPORT**

Recommendation No.

- 1. Resolved.** In the Drug Enforcement Administration's (DEA) September 23, 2003 Action Plan submitted with its response to the draft report, the DEA stated that it concurred with this recommendation and that its new draft FY 2003-2008 Strategic Plan includes a general long-term goal and four specific strategic goals with two and five-year quantitative, time-specific objectives. The DEA believes that the revised goal and objectives will meet the requirements of Office of Management and Budget (OMB) Circular A-11. The DEA stated that it would provide the revised Strategic Plan to the Office of the Inspector General (OIG) upon final approval. The DEA plans to complete this action by October 2003.

We can close this recommendation when we receive a copy of the DEA's revised Strategic Plan that shows the DEA has established goals and objectives that are quantitative, directly measurable, or assessment based as required by OMB Circular A-11.

- 2. Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that its FY 2004 Budget Request to Congress provides performance information for the following four strategic focus areas, which are defined in the DEA's draft FY 2003-2008 Strategic Plan: International Enforcement, Domestic Enforcement, State and Local Assistance, and Diversion Control. The DEA stated that it has specific performance indicators for each of the four strategic focus areas, but performance results are not available for the DEA's general long-term goal of contributing to the DOJ's goal to reduce the availability of drugs in America. The DEA stated that it plans to complete development of an impact assessment methodology in order to demonstrate results on its efforts to reduce drug availability. The DEA plans to complete this action by December 2003.

We can close this recommendation when we receive documentation that shows the DEA completed the above stated action and that its latest budget request includes performance results for all performance indicators included in the budget request.

3. **Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that it has prepared definitions and specific criteria for what constitutes a priority target organization. The DEA stated that the definitions and criteria are under review and will be included in a new Priority Target Handbook, which will be provided to the OIG upon final approval. The DEA plans to complete these actions by November 2003.

We can close this recommendation when we receive documentation that shows the DEA has established criteria for determining what constitutes a priority target organization.

4. **Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that it has prepared definitions and specific criteria for what constitutes a disruption/dismantlement. The DEA stated that the definitions and criteria are being compiled into a new Priority Target Handbook, which will be provided to the OIG upon final approval. The DEA plans to complete these actions by November 2003.

We can close this recommendation when we receive documentation that shows the DEA has established criteria for determining what constitutes a disrupted and dismantled priority target organization.

5. **Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that: 1) its Office of Diversion Control has defined disruption and dismantlement and established a methodology to collect, analyze, and report performance data, 2) it is considering proposals concerning the assessment of the DEA's impact on drug availability, and 3) it has modified a contract to incorporate all international priority target organizations into the Priority Target and Resource Reporting System (PTARRS). Further, the DEA stated that: 1) its Office of Diversion Control is evaluating the consolidation of several data systems into one relational interface that will capture all disruption and dismantlement information, and it will complete the action by December 2004; 2) it plans to complete the development of an impact assessment methodology by December 2004 in order to demonstrate results on reduction of drug availability, and 3) it plans to modify the PTARRS by December 2003 to include all international priority target organizations.

We can close this recommendation when we receive documentation that shows the DEA completed the actions stated above and that the newly established or enhanced systems are adequate to collect, analyze, and

report performance data related to the performance indicators for: 1) suppliers disrupted and dismantled, 2) contribution to reduction in drug use and availability, and 3) international priority target organizations disrupted and dismantled.

- 6. Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that its Office of Diversion Control uses established procedures and controls to verify the performance data reported for disruptions and dismantlements. According to the DEA's response, the established procedures include: 1) reviewing discrepancies, 2) resolving questions in the field, 3) evaluating inconsistencies prior to data entry, 4) verifying and recording disposition data, and 5) assigning the appropriate administrative codes to each registration. The DEA also stated that it is considering proposals concerning the assessment of the DEA's impact on drug availability; has modified a contract to incorporate all international priority target organizations into the PTARRS; and plans to:
- Include existing data verification procedures in any effort to consolidate existing DEA data systems by December 2003.
 - Include data verification procedures in the resulting impact assessment system by December 2004.
 - Modify the PTARRS to include all international priority target organizations by December 2003.

We can close this recommendation when we receive documentation of the written procedures and controls to verify the performance data for the performance indicators for: 1) suppliers disrupted and dismantled, 2) contribution to reduction in drug use and availability, and 3) international priority target organizations disrupted and dismantled.

- 7. Resolved.** In its September 23, 2003 Action Plan, the DEA stated that it concurred with this recommendation and that it has established a quarterly review process for performance data that entails comparing actual performance data to established annual targets. The DEA stated that it would establish a methodology to estimate projected performance based on actual data for each performance indicator identified in the DEA's four strategic focus areas. The DEA plans to complete this action by December 2004.

We can close this recommendation when we receive documentation that shows the DEA completed the action stated above and that the DEA has established goals consistent with historical performance results.