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Report to the Senate and House Committees on Appropriations

January 2005

DRUG CONTROL

High Intensity Drug Trafficking Areas' Efforts to Link Investigations to International Drug Traffickers

GAO-05-122

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GAO Accountability·Integrity·Reliability

Highlights

Highlights of GAO-05-122, a report to the Senate and House Committees on Appropriations

Why GAO Did This Study

In fiscal year 2002, the Attorney General called upon law enforcement to target the "most wanted" international drug traffickers responsible for supplying illegal drugs to America. In September 2002, law enforcement, working through the multi-agency Organized Crime Drug Enforcement Task Force (OCDETF) Program, developed a list of these drug traffickers, known as the Consolidated Priority Organization Target List (CPOT), to aid federal law enforcement agencies in targeting their drug investigations. Also, the White House's Office of National Drug Control Policy (ONDCP) collaborated with law enforcement to encourage existing High Intensity Drug Trafficking Areas (HIDTA) to conduct CPOT investigations. According to ONDCP, the 28 HIDTAs across the nation are located in centers of illegal drug production, manufacturing, importation, or distribution. ONDCP distributed discretionary funds to supplement some HIDTAs' existing budgets beginning in fiscal year 2002 to investigate CPOT organizations. Out of concern that a CPOT emphasis on international drug investigations would detract from the HIDTA program's regional emphasis, the Senate Committee on Appropriations directed GAO to examine whether investigations of CPOT organizations are consistent with the HIDTA program's mission and how ONDCP distributes its discretionary funds to HIDTAs for CPOT investigations.

www.gao.gov/cgi-bin/getrpt?GAO-05-122.

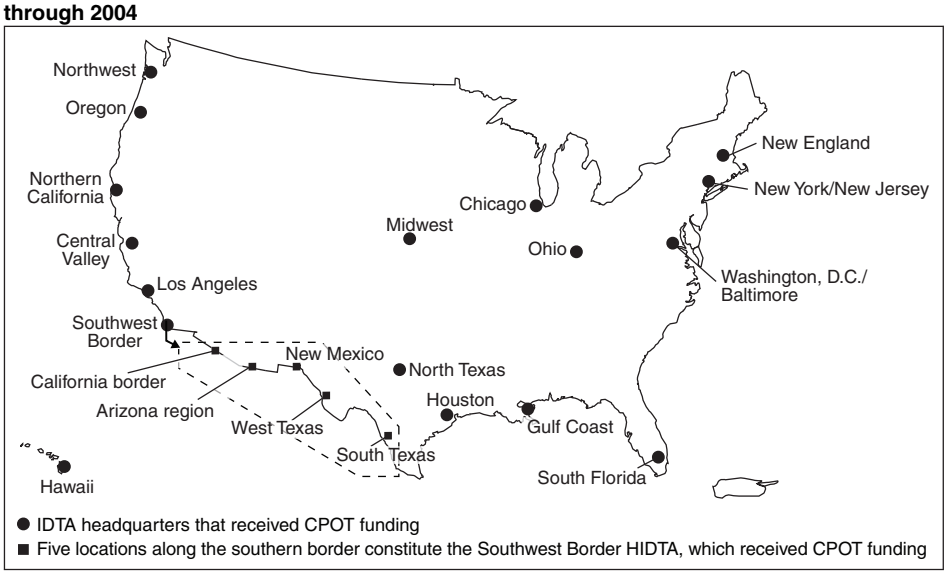
To view the full product, including the scope and methodology, click on the link above. For more information, contact Laurie Ekstrand, (202) 512-2758 or ekstrandl@gao.gov.

What GAO Found

The mission of the HIDTA program is to enhance and coordinate U.S. drug control efforts among federal, state, and local law enforcement agencies to eliminate or reduce drug trafficking and its harmful consequences in HIDTAs. CPOT investigations were not inconsistent with this mission because HIDTAs' targeting of local drug traffickers linked with international organizations on the CPOT list was one possible strategy for achieving the program's goal of eliminating or reducing significant sources of drug trafficking in their regions. GAO found that in fiscal years 2002 through 2004, ONDCP distributed discretionary funds to 17 of the 28 HIDTAs for CPOT investigations. Some HIDTA officials said they did not receive CPOT funding for several reasons including unclear guidance, insufficient application information to the HIDTAs for funding, and local priorities not linking with CPOT investigations. Reduced discretionary funding in fiscal year 2004 for CPOT investigations affected the number of HIDTAs that received this funding.

ONDCP and the Department of Justice (Justice) agreed with the facts in this report. Regarding application information provided to HIDTAs, ONDCP did not agree with some HIDTA officials' view that it was insufficient. Justice acknowledged that some HIDTAs faced difficulty obtaining the CPOT list but were confident the problem has been overcome. Regarding local priorities not linking with CPOT investigations, ONDCP stated HIDTAs should be focusing on investigations of local activities that reach beyond the boundaries of the HIDTA, given their designation as centers of illegal trafficking that affect other parts of the country.

High Intensity Drug Trafficking Areas That Received CPOT Funding for Fiscal Years 2002 through 2004



Source: GAO.

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Abbreviations

CPOT	Consolidated Priority Organization Target
DEA	Drug Enforcement Administration
FBI	Federal Bureau of Investigation
HIDTA	High Intensity Drug Trafficking Areas
OCDETF	Organized Crime Drug Enforcement Task Force
ONDCP	Office of National Drug Control Policy

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United States Government Accountability Office
Washington, DC 20548

January 28, 2005

The Honorable Thad Cochran
Chairman
The Honorable Robert C. Byrd
Ranking Minority Member
Committee on Appropriations
United States Senate

The Honorable Jerry Lewis
Chairman
The Honorable David Obey
Ranking Minority Member
Committee on Appropriations
House of Representatives

The war against illegal drugs is fought both internationally and domestically, as many of the "most wanted" international drug traffickers are the primary suppliers of illegal drugs in the United States. In September 2002, the U.S. Attorney General called on the law enforcement community to target the most wanted international drug traffickers for special law enforcement emphasis by developing a list known as the Consolidated Priority Organization Target (CPOT) list. The White House's Office of National Drug Control Policy (ONDCP) collaborated with the Department of Justice (Justice) in an effort to encourage High Intensity Drug Trafficking Areas (HIDTA)[1] to conduct CPOT investigations. ONDCP, through its federally funded HIDTA program, coordinates much of America's drug control efforts among federal, state, and local agencies to reduce drug trafficking in critical regions of the United States. ONDCP responded to Justice's emphasis on the CPOT list by designating a portion of its discretionary funds to supplement HIDTAs' ongoing investigations of drug traffickers that link with international drug organizations on the CPOT list.

[1]The HIDTA program is a federally funded program that brings together federal, state, and local law enforcement agencies into task forces that conduct investigations of drug trafficking organizations engaged in illegal drug production, manufacturing, importation, or distribution.

Out of concern that a CPOT emphasis on international drug investigations would detract from the HIDTA program's regional emphasis, the Senate Committee on Appropriations, in its Committee Report 108-146, directed us to, among other things, conduct a study concerning whether investigations of international drug trafficking organizations on the CPOT list are consistent with the HIDTA mission. For this report, we examined (1) whether CPOT investigations[2] undertaken by HIDTAs were consistent with the mission of the HIDTA program as authorized in the Office of National Drug Control Policy Reauthorization Act of 1998[3] (the Reauthorization Act) and (2) how ONDCP distributed discretionary funds to HIDTAs for CPOT investigations and why some HIDTAs did not receive funding. We are also providing information in appendix II about federal law enforcement organizations that are engaged in CPOT investigations and how many investigations they conducted in fiscal year 2003 and the first 7 months of fiscal year 2004.[4]

To address these objectives, we reviewed applicable legislation, ONDCP strategic plans and policies, and all HIDTA applications (38) for CPOT funding in fiscal years 2002 and 2003 to determine whether CPOT investigations, as discussed in the applications, were consistent with the HIDTA mission. We reviewed documents and correspondence that described the basis for ONDCP's decisions for distributing CPOT funds to HIDTAs and interviewed officials at 8 of the 13 HIDTAs that did not receive CPOT funds in fiscal years 2002 and 2003. We also interviewed officials at federal law enforcement agencies engaged in CPOT investigations. We conducted our work between March and December 2004 in accordance with generally accepted government auditing standards.

[2]We are using the term *CPOT investigations* in this report to describe domestic drug investigations conducted by HIDTAs that link to leaders of international drug organizations on the CPOT list.

[3]Pub. L. No. 105-277, div. C, tit. VII, §§ 701-715, 112 Stat 2681, 2681-670-93.

[4]We were unable to determine the dollar amounts that federal agencies designated for CPOT investigations because they do not record resources for CPOT investigations separately from resource expenditures for other investigations they conduct.

Results in Brief

CPOT investigations were not inconsistent with the HIDTA mission because HIDTAs' targeting of local drug traffickers[5] linked with international organizations on the CPOT list was one possible strategy for achieving the program's goal of eliminating or reducing significant sources of drug trafficking in their regions. On the basis of the Reauthorization Act, ONDCP interpreted the HIDTA mission as enhancing and coordinating U.S. drug control efforts among federal, state, and local law enforcement agencies to eliminate or reduce drug trafficking and its harmful consequences in HIDTAs. Drug traffickers operating in a HIDTA that are affiliated with illegal international drug organizations would contribute to the HIDTA's status as a center of illegal drug importation as well as have a harmful impact in other regions. These two factors—importation and distribution across regions—are among several statutory factors that the director of ONDCP must consider when designating a region as a HIDTA.

ONDCP distributed discretionary funds to HIDTAs to help support their investigations of drug traffickers linked with international organizations on the CPOT list by reviewing and approving applications for funding from the HIDTAs. During fiscal years 2002, 2003, and 2004, 17 of 28 HIDTAs received CPOT funds. ONDCP encourages applications for CPOT funding where additional funds are likely to benefit an initiative and move the investigation forward. However, we identified several reasons why certain HIDTAs did not receive funding, including unclear guidance in fiscal year 2002, insufficient information for applying for funding, and local priorities not linking with CPOT investigations. ONDCP addressed the unclear guidance by meeting with HIDTAs to explain how to link their investigations with the CPOT list. ONDCP was unable to provide the full CPOT list to the HIDTAs, which would help them determine if they qualify for funding. Justice and several other federal law enforcement agencies controlled and tracked the distribution of the CPOT list and designated it as "law enforcement sensitive." They determined that sharing the full CPOT list with HIDTAs, state or local police, and non-law enforcement organizations such as the White House's ONDCP was to be done on a "need-to-know" basis at their discretion. Justice said it was not its intent to withhold access to the CPOT list from HIDTA personnel. Although we have no indications of such intent, we found some HIDTAs had more

[5]We are using the term *local drug traffickers* to refer to HIDTA region-wide drug trafficking organizations that have been identified by HIDTAs in their ONDCP-approved threat assessments developed in consultation with the local, state, and federal law enforcement agencies within their respective geographic region.

difficulty than others in obtaining the full CPOT list from these agencies. Although ONDCP believes the information it provided to HIDTAs was sufficient, some HIDTAs disagree. In 2004, ONDCP advised all HIDTAs that because of reduced discretionary funding for CPOT investigations, they should focus their applications on three specific CPOT organizations that provided a baseline of opportunity for all HIDTAs to apply for CPOT funding. ONDCP recognized that reduced discretionary funding for CPOT investigations in fiscal year 2004 affected the number of HIDTAs that received this funding. With respect to local priorities, some HIDTAs did not request or receive funding because they could not show a link between CPOT organizations and their investigations of domestic drug producers and distributors. However, ONDCP stressed that HIDTAs should be focusing on investigations of local activities that reach beyond the boundaries of the HIDTA, given their designation as centers of illegal trafficking that affect other parts of the country.

We provided a draft of this report to the Director of ONDCP and the Department of Justice's Attorney General for their review and comment, and both generally concurred with the facts of this report but added some clarifying language, which we incorporated in the report where appropriate. A copy of the comments from both agencies is in appendixes III and IV, respectively.

Scope and Methodology

To obtain information on whether CPOT investigations were consistent with the mission of the HIDTA program, we reviewed the Office of National Drug Control Policy Reauthorization Act of 1998, ONDCP's appropriations statutes and accompanying committee reports, ONDCP's strategic plans and policies, and ONDCP's Web site.[6] We also reviewed all HIDTA applications (38) to ONDCP from HIDTAs that received discretionary funds for various investigation activities linked to the CPOT list in fiscal years 2002 and 2003, and compared them with the mission of the HIDTA program.[7] At 11 selected HIDTA sites—Appalachia; Atlanta; Central Florida; Lake County, Indiana; Los Angeles; Milwaukee; Nevada; North Texas; Oregon; Rocky Mountain; and Washington-Baltimore—we interviewed HIDTA management officials and task force leaders to discuss

[6]ONDCP's Internet Web page: http://www.whitehousedrugpolicy.gov/hidta/frames_overview.html/.

[7]We did not include applications awarded CPOT funding for fiscal year 2004 in our application review because ONDCP had not concluded the award process at that time.

whether their investigative activities were consistent with the HIDTA mission. We selected these 11 HIDTAs to ensure geographic spread (east coast, central, west coast) across the country.

To obtain information about ONDCP's distribution of CPOT funding, we interviewed ONDCP officials and obtained statistics they provided on HIDTAs that received CPOT funding in fiscal years 2002, 2003, and 2004 (app.I). We also reviewed ONDCP documents and correspondence that described the basis for ONDCP's decision for awarding HIDTAs CPOT funding. In addition, we discussed with officials at three HIDTAs—Washington-Baltimore, North Texas, and Los Angeles—how CPOT funding was being used. We selected these three HIDTAs because they had received funds for both fiscal years 2002 and 2003 and were geographically dispersed. We also interviewed officials from 8 of the 13 HIDTAs (Appalachia, Atlanta, Central Florida, Lake County, Milwaukee, Nevada, Oregon, and Rocky Mountain) that did not apply for or applied for but did not receive CPOT funding in fiscal years 2002 and 2003. We selected these HIDTAs to reflect broad geographic segments of the country.

We determined that the data presented in appendixes I and II from ONDCP, the Organized Crime Drug Enforcement Task Force (OCDETF), the Drug Enforcement Administration (DEA), and the Federal Bureau of Investigation (FBI) are sufficiently reliable, for the purposes of this review, based on interviews with agency officials and a review of their information systems documentation.

Background

In 1988, Congress established the White House's Office of National Drug Control Policy to, among other things, coordinate the efforts of federal drug control agencies and programs and establish the HIDTA program. By fiscal year 2004, ONDCP had designated 28 drug trafficking areas (HIDTAs) as centers of illegal drug production, manufacturing, importation, or distribution within the United States with a federally funded HIDTA program budget of about $225 million.[8] Each HIDTA is to develop and implement an annual strategy to address the regional drug threat. The initiatives involve the active participation of federal, state, and

[8]Congressional funding for the HIDTA program, which was between $221 and $225 over the last 3 fiscal years up through 2004, consisted of a base level of about $206 million for HIDTA operations (allocated to each HIDTA at a level not less than what they received the previous year), and discretionary funds of between $15 and $19 million for special projects, such as CPOT funding.

local law enforcement agencies to enhance and assist the coordination of drug trafficking control efforts in the region. To encourage HIDTAs to conduct CPOT investigations, ONDCP utilized discretionary funding. In fiscal year 2004, ONDCP allocated about $8 million in discretionary funding to HIDTAs to support their drug initiatives that link with international drug trafficking organizations on the CPOT list. This funding is not meant to supplant or replace existing agency/program budgets intended for similar purposes, according to ONDCP guidance to the HIDTAs.

OCDETF is a nationwide law enforcement task force program administered within Justice that targets major narcotic trafficking and money laundering organizations using the combined resources and expertise of its federal member agencies together with state and local investigators.[9] Its mission is to identify, investigate, and prosecute members of high-level drug trafficking enterprises and to dismantle or disrupt the operations of those organizations. To help carry out this mission and to focus investigative resources on major sources of supply, OCDETF member agencies developed the CPOT list of major international drug trafficking organizations.

In September 2002, at the request of the U.S. Attorney General, OCDETF issued the first CPOT list, naming international drug trafficking organizations most responsible for supplying illegal drugs to the United States. OCDETF member agencies developed criteria for determining whether an international drug organization was to be placed on the CPOT list. Criteria include whether the international organization

- operates nationwide in multiple regions of the United States and
- deals in substantial quantities of illegal drugs or illicit chemicals on a regular basis that have a demonstrable impact on the nation's drug supply.

[9]OCDETF's member federal agencies are the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF); the Drug Enforcement Administration; the Federal Bureau of Investigation; the Internal Revenue Service (IRS); the United States Coast Guard (USCG); the Bureau of Immigration and Customs Enforcement (ICE); and the United States Marshals Service (USMS).

OCDETF compiles and issues the CPOT list at the beginning of each fiscal year,[10] with the intent that federal law enforcement agencies will target their investigations on CPOT organizations. OCDETF member agencies control the CPOT list and its distribution. OCDETF also collaborates with ONDCP on reviews of CPOT funding applications by HIDTAs that link their initiatives with the CPOT list.

CPOT Investigations Were Not Inconsistent with the Mission of the HIDTA Program

CPOT investigations were not inconsistent with the mission of the HIDTA program because HIDTAs' targeting of local drug traffickers linked with international organizations on the CPOT list was one possible strategy for achieving the program's goal of eliminating or reducing significant sources of drug trafficking in their regions. The mission of the HIDTA program is not expressly stated in current law. However, ONDCP has developed a mission statement that reflects the legislative authority for the HIDTA program, specifically, to enhance and coordinate U.S. drug control efforts among federal, state, and local law enforcement agencies to eliminate or reduce drug trafficking and its harmful consequences in critical regions of the United States.

The primary legislative authority for the HIDTA program is the Reauthorization Act,[11] which provides guidance on the mission of the program by setting out factors for the Director of ONDCP to consider in determining which regions to designate as HIDTAs. The factors contained in the act are the extent to which

1. the area is a center of illegal drug production, manufacturing, importation, or distribution;

2. state and local law enforcement have shown a determination to respond aggressively to drug trafficking in the area by committing resources to respond to it;

3. drug-related activities in the area are having a harmful impact in other areas of the country; and

[10]OCDETF reviews the CPOT list at the midpoint of the fiscal year and adds drug trafficking organizations, if warranted.

[11]The Office was originally established by the Anti-Drug Abuse Act of 1988, Pub. L. No. 100-690, 102 Stat. 4181, 4181, with almost identical language authorizing the HIDTA Program, *id.* §1005(c), 102 Stat. at 4186.

4. a significant increase in federal resources is necessary to respond adequately to drug-related activities in the area.[12]

In addition, House and Senate Appropriations Committee reports on ONDCP's appropriations have stated that the program was established to provide assistance to federal, state, and local law enforcement entities operating in those areas most adversely affected by drug trafficking.[13]

The use of a portion of the HIDTA program's discretionary funds to focus on CPOT investigations is not inconsistent with ONDCP's mission statement for the program and the legislative authority on which it is based, particularly the first and third factors in the Reauthorization Act. Drug traffickers operating in a HIDTA may be linked with the CPOT list because of their role in major international drug trafficking activities, including illegal distribution in multiple regions of the United States. Given such activities, they would contribute to the HIDTA's status as a center of illegal drug importation and distribution and have a harmful impact in other regions. Similarly, in keeping with appropriations committee statements on the purpose of the program, HIDTA involvement in CPOT investigations is one way of assisting federal, state, and local operations in areas where the significant adverse effects of drug trafficking activities are due in part to links to international criminal organizations. Thus, for HIDTAs to investigate and disrupt or dismantle regional drug traffickers that are linked with CPOT organizations is not inconsistent with the HIDTA program's stated mission and its legislative authority.

[12]Office of National Drug Control Policy Reauthorization Act of 1998, §707(c) (codified at 21 U.S.C. §1706(c) (2000)). These same factors were listed in §1005(c)(2) of the Anti-Drug Abuse Act of 1988 when the HIDTA program was first authorized.

[13]See, e.g., S. Rep. No. 108-146, at 139 (2003); H.R. Rep. No. 107-575, at 68 (2002); S. Rep. No. 107-212, at 59 (2002).

ONDCP Distributed Discretionary Funds to Many HIDTAs to Help Support CPOT Investigations

ONDCP distributed discretionary funds to HIDTAs to help support their investigations of drug traffickers linked with international organizations on the CPOT list by reviewing and approving HIDTA applications for funding. In fiscal years 2002, 2003, and 2004, ONDCP distributed CPOT funds to a total of 17 of the 28 HIDTAs.[14] A Justice official who participates in the evaluation of HIDTA applications for CPOT funding said that ONDCP encourages applications for CPOT funding where additional funds are likely to benefit an initiative and move the investigation forward. Some HIDTAs chose not to apply because they face a domestic drug threat that does not have a link to any international CPOT organization activity. Other HIDTAs that have applied for funds did not receive CPOT funding because they did not have sufficient investigative resources to uncover the link to a CPOT organization. In commenting on a draft of this report, Justice said that while this may be true in some circumstances, it was also often the case that HIDTAs may have had sufficient resources but simply had not yet taken the investigation far enough to justify the award of discretionary funds. During fiscal years 2002 and 2003, 6 HIDTAs did not apply and 7 applied but were not approved for CPOT funding. In fiscal year 2004, 17 of the 28 HIDTAs did not receive CPOT funding—10 did not apply and 7 applied but were not approved for funding.

ONDCP and HIDTA officials mentioned several reasons why some HIDTAs may not receive funding.[15] First, some HIDTAs were denied funding if the investigative activities in their funding applications were not consistent with the HIDTA mission and linked to a CPOT organization. Second, ONDCP did not provide clear guidance or sufficient information for HIDTAs to develop their applications for CPOT funds, although it took steps to clarify its guidance and create opportunity for all HIDTAs to participate. Third, reducing the amount of discretionary funds available for CPOT funding in fiscal year 2004 affected the number of HIDTAs that received this funding. Fourth, HIDTAs' local priorities may not link to any CPOT organization activity.

[14]In fiscal year 2002, 8 HIDTAs received CPOT funding; in fiscal year 2003, 14 HIDTAs received CPOT funding; in fiscal year 2004 11 HIDTAs received CPOT funding. Collectively, in all 3 years 17 HIDTAs received CPOT funding (see app.1).

[15]Our review of applications for CPOT funding did not include those for which no funds were awarded by ONDCP.

Drug Investigative Activities Must Be Consistent with the HIDTA Mission and Linked to the CPOT List to Receive CPOT Funds

ONDCP granted CPOT funding for HIDTA investigative activities that it determined demonstrated a link to the CPOT list and were consistent with the mission of the HIDTA program.[16] As an example, one of the applications we reviewed requested CPOT funding for overtime pay, video cameras, portable computers, and wiretaps for surveillance activities to target a complex criminal organization involved in the distribution of significant quantities of heroin and cocaine as well as related homicides, abductions, arson, assaults, fraud, and witness tampering. Surveillance of the organization indicated that it was being supplied with drugs through an affiliate of a Latin American/Caribbean-based CPOT organization. Therefore, these drug activities were linked to an organization on the CPOT list, and the investigations also were consistent with the HIDTA program's mission, in that these activities contributed to eliminating or reducing significant sources of drug trafficking within the HIDTA region.

Drug investigation activities that were not consistent with the HIDTA program's mission were not to receive CPOT funds from ONDCP, even if they showed a CPOT link. Specifically, it is inconsistent with the HIDTA program's mission to supplant funds from other sources. Rather CPOT funds are meant to supplement funding for investigations that support the HIDTA mission. For example, in one HIDTA application, a request was made for $686,000 for the HIDTA to provide software to a cellular telephone company located in a Caribbean country to monitor the cellular telephone calls of a CPOT organization. The application also asked for travel expenses of $7,500 to send a prosecutor and two HIDTA investigators to that country to review the cellular telephone records. ONDCP officials told us that they denied funding for these activities because ONDCP guidance to the HIDTAs regarding CPOT funding states that the funds cannot be used to "supplant," or replace, existing agency/program budgets intended for similar purposes because to do so would be inconsistent with the HIDTA mission. In commenting on a draft of this report, ONDCP made the clarifying statement that CPOT funding is provided for investigations of major drug trafficking organizations affiliated with CPOTs. However, HIDTAs do not participate in international investigations, and CPOT funding cannot be used to conduct or supplement investigations in places like Colombia or Afghanistan. In another application, a request was made for $120,000 to pay for street

[16]HIDTA applications for CPOT funding may contain multiple drug investigation activities in one initiative. Also, some applications may receive funding for some activities and not for others.

lighting in a drug-infested crime area of a major U.S. city to aid the HIDTA surveillance task force in pursuing drug enforcement operations. ONDCP officials told us that they determined the activity was not consistent with the HIDTA mission because CPOT funding cannot be used to supplant a city's budget for street maintenance and improvements.

ONDCP Did Not Provide Sufficient Information for Some HIDTAs to Fully Develop Their Applications for CPOT Funding but Took Steps to Address These Issues

In some cases, ONDCP's lack of clear guidance or sufficient information limited some HIDTAs' ability to apply for CPOT funding. For example, some HIDTA officials told us that in fiscal year 2002, ONDCP did not provide clear directions in its guidance about how HIDTAs were to document the link between their investigations and the CPOT list. However, in fiscal year 2003, ONDCP's officials recognized the problem and, at quarterly meetings, discussed with HIDTAs how to document links between their investigations and the CPOT list, thus resolving the problem. In addition, ONDCP was only able to provide a partial CPOT list to officials in all HIDTAs in each of the 3 fiscal years it provided CPOT funding, even though applications were to include a link between their investigations and the CPOT list. The partial list contained some of the largest organizations in operation and ones that were most frequently targeted by law enforcement. ONDCP, in its guidance, advised HIDTAs that they could obtain the entire list from their Justice contacts.[17] Some HIDTA officials said not having a full list available to them from ONDCP limited their ability to apply for CPOT funding. In fiscal year 2004, ONDCP created an opportunity for all HIDTAs to participate.

According to OCDETF officials, access to the full CPOT list is restricted to federal law enforcement officials. Commenting on a draft of this report, Justice said these restrictions are driven by the fact that the member agencies have designated the list as "law enforcement sensitive," because disclosure of certain investigative information contained on the list might jeopardize ongoing investigations of targeted organizations. As a result, access to the full CPOT list is restricted to OCDETF-member federal law enforcement agencies. Nonparticipating federal agencies, HIDTA directors, state and local police officials, and non-law enforcement federal agencies such as ONDCP could obtain the list from U.S. Attorneys or Special Agents-in-Charge of the OCDETF member agencies on a need-to-

[17]Commenting on a draft of this report, Justice said the CPOT list was available from U.S. Attorney's offices and the Special Agents-in-Charge of any OCDETF-member agency; see appendix II for member agencies.

know basis. To facilitate the distribution of discretionary CPOT funding, however, OCDETF provided a partial list, which contained information on some of the largest organizations and those commonly known to, and targeted by, the law enforcement community, to ONDCP. Since HIDTA officials have said that they need to know who is on the CPOT list to determine which of their investigations qualify for CPOT funds, ONDCP, in its guidance, advised HIDTAs to obtain the full CPOT list through their Justice contacts. However, officials from 2 HIDTAs we spoke to said that they had some difficulty in obtaining the full CPOT list.

We spoke with officials from 8 of the 13 HIDTAs that either did not apply or applied for and did not receive CPOT funds in either of the first 2 years (fiscal years 2002 and 2003) ONDCP awarded CPOT funds. Officials from 2 of the HIDTAs said that obtaining the full list was a problem because for one HIDTA, they did not have the full CPOT list within the time needed to complete the application, and the other HIDTA said there was not a formal procedure for obtaining the full CPOT list. Officials from 6 of the 8 HIDTAs said it was not a problem, however, because they were able to obtain the full CPOT list from their Justice contacts. Although these examples may not typify all HIDTAs, they nevertheless indicate that not every HIDTA was able to readily access the full CPOT list and that it would be difficult to show how their investigations qualify for CPOT funds without having the full list. Although ONDCP believed the CPOT information it provided was sufficient for all HIDTAs to fairly compete for discretionary CPOT funding, an ONDCP official responsible for CPOT funding acknowledged that not receiving a full CPOT list most likely reduced opportunities for some HIDTAs to receive CPOT funding or discouraged others from applying for funds.

All HIDTAs are eligible to apply to receive CPOT funding, according to ONDCP officials, even though 13 of the 28 HIDTAs did not apply for or applied for but did not receive CPOT funding in fiscal years 2002 and 2003. In fiscal year 2004, ONDCP's guidance identified three international organizations that trafficked in illegal drugs in all HIDTAs. ONDCP officials said that this additional guidance would allow all HIDTAs to focus their limited funding on these three organizations and would allow a baseline of opportunity for all HIDTAs to apply for CPOT funding. ONDCP stated it would give preference to funding applications that had links to these three CPOT organizations. Ten of the 11 HIDTAs that received CPOT funds in fiscal year 2004 linked their applications to the three CPOTs referenced in ONDCP's guidance. Providing HIDTAs with the names of three CPOT organizations that operated in all the HIDTA regions established a baseline of opportunity for the HIDTAs to apply for funding

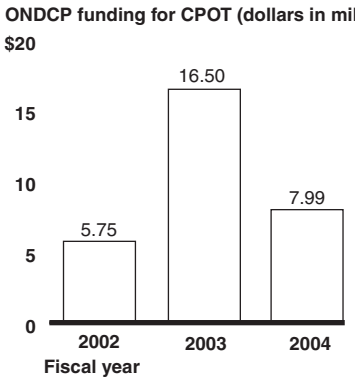
despite receiving a limited number of CPOT organizational targets from ONDCP.

Commenting on a draft of this report, Justice acknowledged that the HIDTAs did face some difficulty regarding the distribution of the CPOT list. However, through participation with ONDCP in evaluating applications for CPOT funding, Justice officials noticed that—for those HIDTAs that applied—problems associated with the limited distribution of the list appeared to be confined to fiscal year 2002, when the list was first developed. In subsequent years, law enforcement agencies, including those in the HIDTAs, were more familiar with the CPOT list and how to gain access to it.

ONDCP's Reduction of CPOT Funding in Fiscal Year 2004 Affected HIDTA Participation

The CPOT funding amount almost tripled from fiscal year 2002 to fiscal year 2003 but was cut in half in fiscal year 2004. Given the reduction in discretionary funding allocated to CPOT funding, ONDCP officials said that even if HIDTAs link their investigations to the CPOT list, and do not supplant other funding sources, they are not guaranteed CPOT funding. They recognized that reduced funding affected HIDTA participation. As shown in figure 1, fiscal year 2004 funding was reduced from $16.5 million to $7.99 million.

Figure 1: CPOT Funding by Fiscal Years



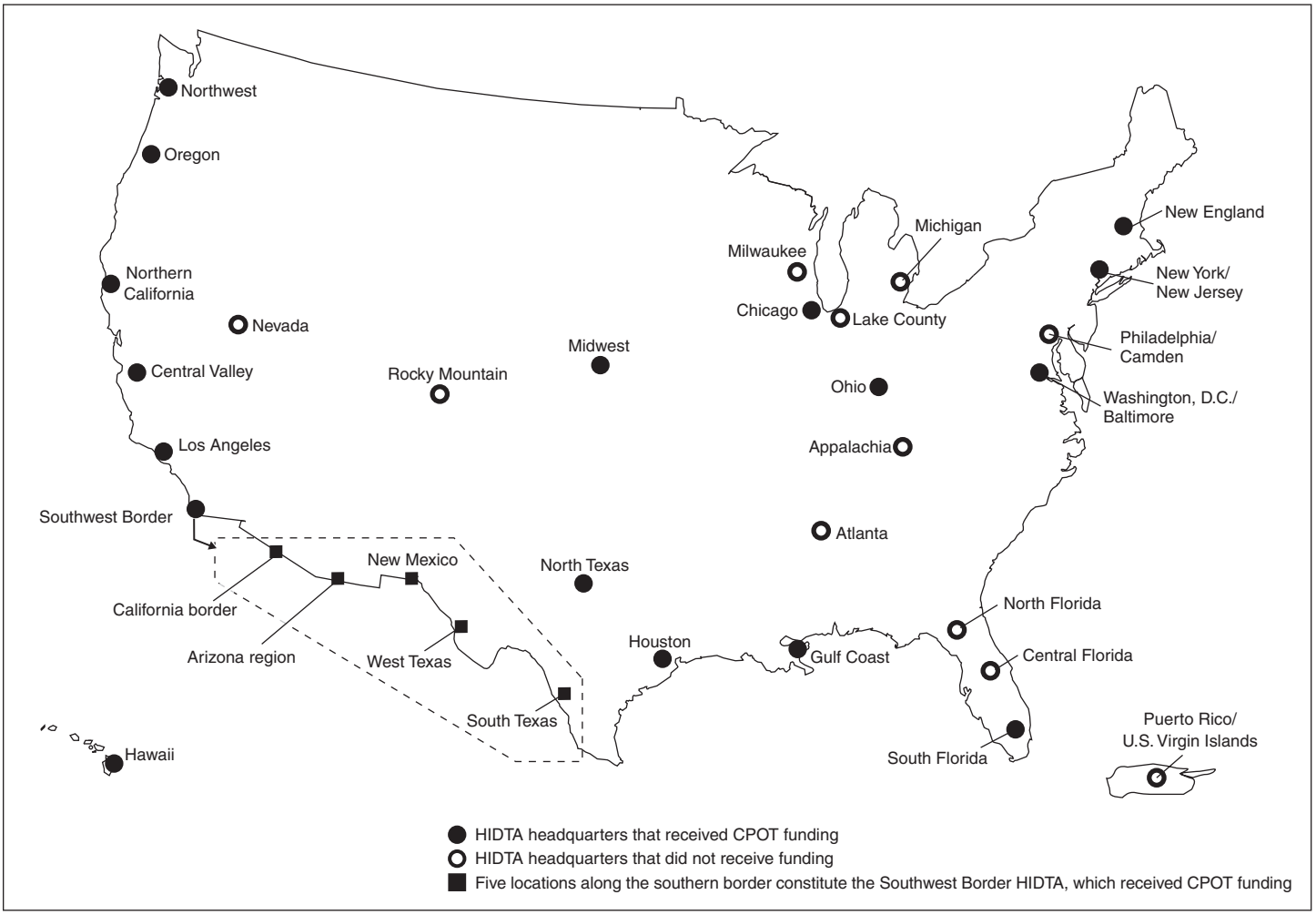
Source: GAO analysis of ONDCP data.

In the first year, 8 HIDTAs received funding. In the second year, 14 HIDTAs received funding, and in the third year, when funding was reduced, 11 HIDTAs received funding. Despite more than a 50 percent drop in funding in fiscal year 2004, 2 of 11 HIDTAs received CPOT funding for the first time. While there could be multiple causes, we also noted that

the number of HIDTAs that did not apply in fiscal year 2004 compared with prior years increased from 6 to 10. ONDCP officials said that the limited CPOT funds must be directed at those HIDTAs where, in the judgment of those officials who reviewed the CPOT applications, the supply of drugs from CPOT organizations had the best chance of being interrupted.

Commenting on a draft of this report, ONDCP agreed that the reduction of CPOT funding in fiscal year 2004 affected HIDTA participation but added that this observation, while accurate, should be stated within the context of all discretionary funding activities. ONDCP consulted with Congress prior to allocating the discretionary funding, as required by the report language accompanying the ONDCP's appropriations. As a result of those consultations, ONDCP decided to reduce the amount available for funding CPOT-related investigations in order to fund other activities. Thus, while the reduction in fiscal year 2004 for CPOT-related funding resulted in fewer HIDTAs receiving CPOT funding, that should not have caused a decline in applications for other discretionary funding activities. For more detailed information on the amounts funded to each HIDTA, see appendix I. Figure 2 shows the 17 HIDTAs that received CPOT funding at least once during fiscal years 2002 through 2004 and the 11 that have not received funding.

Figure 2: Seventeen of 28 High Intensity Drug Trafficking Areas That Received CPOT Funding for Fiscal Years 2002 through 2004



Source: GAO.

Local Priorities May Not Link with CPOT Organizations

Within certain HIDTAs, law enforcement tended to focus more on domestic drug enforcement than on developing links with CPOT organizations. Officials at three HIDTAs we spoke to told us that in fiscal years 2002 and 2003, they did not apply for CPOT funding because their biggest drug problems were domestic drug producers and distributors, such as those organizations involved in methamphetamine and marijuana. As a result, their strategy was to focus on these local drug traffickers that

they were required by law to investigate,[18] and those investigations did not necessarily link with CPOT organizations. In addition, according to some HIDTA law enforcement officials, local law enforcement officers in their HIDTA focused on local investigations rather than those potentially linked with CPOT organizations because they saw a direct benefit to their city or county—prosecution of local targets accompanied by drug and asset seizures. Also, HIDTA officials said that while their law enforcement officers initiated numerous investigations, they do not always have enough funds to proceed to a level that may link the HIDTA investigation to the CPOT list.

Commenting on a draft of this report, ONDCP did not disagree with the facts above but emphasized that HIDTAs should be focusing on investigations of local activities that reach beyond the boundaries of the HIDTA, consistent with their designation as centers of illegal drug trafficking activities that affect other parts of the country.

Agency Comments and Our Evaluation

On December 27, 2004, we provided a draft of this report for review and comment to ONDCP and Justice. ONDCP commented on our analysis that the use of some discretionary funding for the HIDTA program to support CPOT-related drug trafficking investigations was not inconsistent with the HIDTA mission because it was one possible strategy to eliminate or reduce significant sources of drug trafficking in their regions. Justice generally agreed with the substance of the report and provided clarifications that we also incorporated in this report where appropriate. Both agencies focused their comments and clarifications on the second objective: how ONDCP distributed discretionary funds to HIDTAs for CPOT investigations and why some HIDTAs did not receive funding. ONDCP stressed their belief that the information they provided to HIDTAs was sufficient for all HIDTAs to fairly compete for limited CPOT funding, and that although CPOT funding was reduced in fiscal year 2004, HIDTAs could still participate in other discretionary funding activities. Finally, ONDCP believes that while some HIDTAs' investigations may not link to CPOTs, HIDTAs should focus on finding that link, given their designation as centers of illegal trafficking that affect other parts of the country.

[18]Each of HIDTAs' investigations supported with federal funds must be consistent with its approved strategy under the HIDTA program. See, e.g. Consolidated Appropriations Resolution, 2003, Pub. L. No. 108-7, 117 Stat. 11, 447 (2003) (appropriating funds for "drug control activities consistent with the approved strategy for each of the designated High Intensity Drug Trafficking Areas").

Justice emphasized that their restrictions on the distribution of the CPOT list were soundly based, allowed for HIDTAs to gain access to the full list, and were not intended to withhold access to the CPOT list from HIDTA personnel. They acknowledged that HIDTAs did face some difficulty but were confident the problem has been overcome. We incorporated their perspectives as appropriate.

The full text of the ONDCP Deputy Director for State and Local Affairs' letter, and the Department of Justice's Associate Deputy Attorney General's memo are presented in appendix III and IV, respectively.

We will provide copies of this report to appropriate departments and other interested congressional committees. In addition, we will send copies to the Attorney General of the United States and the Director of the Office of National Drug Control Policy. We will also make copies available to others upon request. In addition, the report will be available at no charge on GAO's Web site at http://www.gao.gov. Major contributors to this report are listed in appendix V. If you or your staffs have any questions concerning this report, contact me on (202) 512-8777.

Laurie Ekstrand
Director, Homeland Security
and Justice Issues

Appendix I: CPOT Funding Awarded to HIDTAs, Fiscal Years 2002, 2003, and 2004

	Fiscal year 2002		Fiscal year 2003		Fiscal year 2004	
HIDTA	**Received CPOT funding**	**CPOT funding amount**	**Received CPOT funding**	**CPOT funding amount**	**Received CPOT funding**	**CPOT funding amount**
Central Valley California		0	yes	$500,000		0
Chicago		0	yes	2,600,000	yes	$1,278,048
Gulf Coast		0	yes	110,000		0
Hawaii		0	yes	1,000,000		0
Houston	yes	$690,900	yes	1,251,600	yes	925,000
Los Angeles	yes	965,700	yes	1,220,000	yes	1,091,000
Midwest		0	yes	395,000	yes	290,000
New England		0	yes	1,120,000	yes	445,000
New York/New Jersey	yes	2,100,000		0	yes	550,000
North Texas	yes	150,000	yes	465,000		0
Northern California	yes	107,400	yes	200,000		0
Northwest		0	yes	290,000	yes	245,000
Ohio		0		0	yes	315,000
Oregon		0		0	yes	250,000
South Florida	yes	700,000	yes	841,115	yes	255,000
Southwest Border	yes	796,000	yes	5,000,000	yes	2,350,217
Washington/Baltimore	yes	240,000	yes	1,500,000		0
Total	**8**	**$5,750,000**	**14**	**$16,492,715**	**11**	**$7,994,265**

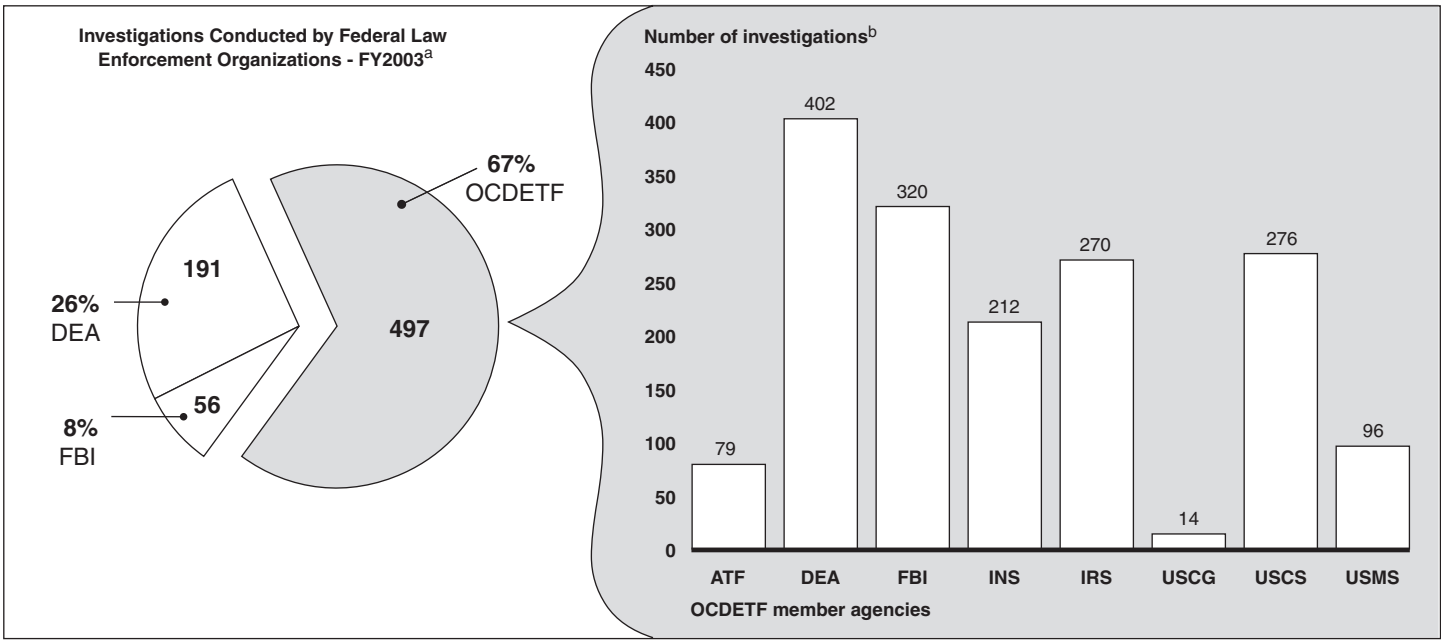
Source: ONDCP.

Note: CPOT refers to Consolidated Priority Organization Target. HIDTA refers to High Intensity Drug Trafficking Area

Appendix II: Federal Law Enforcement Organizations Engaged in CPOT Investigations

During fiscal year 2003, a total of 744 CPOT investigations were conducted by OCDETF member law enforcement agencies. The majority of those investigations (497, or 67 percent) were multi-agency OCDETF investigations, involving participation from DEA, FBI, ICE, IRS and other member agencies, while the remaining were conducted individually by DEA (191, or 26 percent) or FBI (56, or 8 percent).

Figure 3: Federal Law Enforcement Organizations Conducted 744 CPOT Investigations in Fiscal Year 2003



Source: GAO analysis of OCDETF, DEA and FBI data.

Notes: In March 2003, the federal government merged the investigation components of Immigration and Naturalization Service (INS) and U.S. Customs Service (USCS) into one agency—Immigration and Customs Enforcement—under the Department of Homeland Security.

Totals do not add to 100% because of rounding.

Given that these member agencies conduct investigations jointly, totaling the number of CPOT investigations in this figure by each agency does not add up to 497.

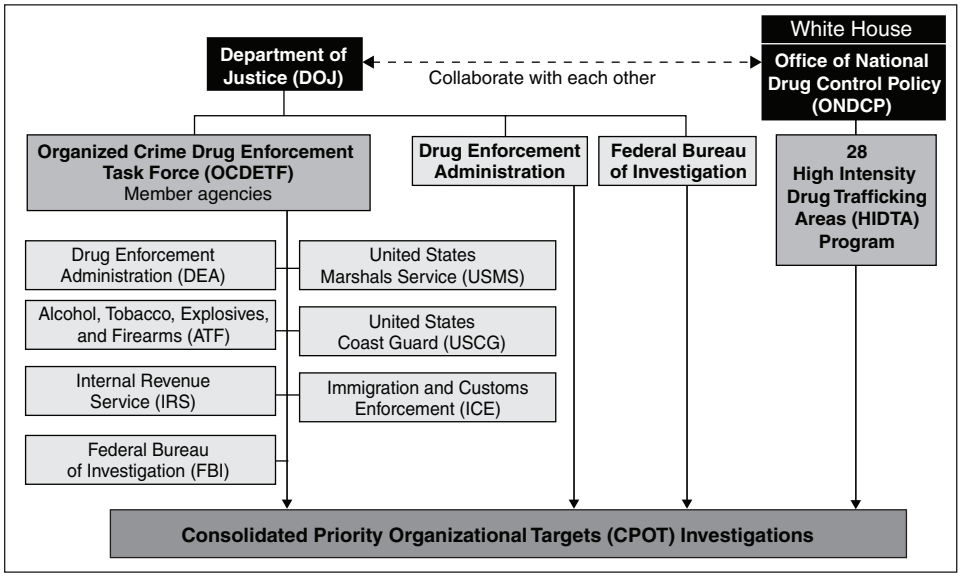
For fiscal year 2004, the majority of CPOT investigations continued to be multi-agency OCDETF investigations. For the first 7 months of fiscal year 2004, 72 percent (548 of 761) of CPOT investigations conducted by member law enforcement agencies were designated as OCDETF investigations. OCDETF officials attributed fiscal year 2004 increases in CPOT investigations over fiscal year 2003 to OCDETF's emphasis on identifying links between targeted domestic organizations and the CPOT list.

As previously mentioned, OCDETF is composed of member agencies that worked together on the 497 CPOT investigations in fiscal year 2003. Member agencies either led investigations or supported other OCDETF member agencies in these investigations. The bar chart in figure 3 shows the number of drug investigations in which each OCDETF member agency participated. For example, DEA participated in 402 CPOT investigations, the highest level of participation by any member agency. FBI participated in 320 investigations, many of which it conducted jointly with DEA along with other member agencies.

DEA and FBI are the only OCDETF member agencies that conducted separate CPOT investigations. Generally, these investigations were handled outside of OCDETF because they did not yet satisfy the criteria for OCDETF designation—that is, they were investigations conducted exclusively by foreign offices or investigations that had not yet developed to a sufficient level to be designated as OCDETF cases. For the first 7 months of fiscal year 2004, data showed that DEA separately conducted 23 percent (172 of 761) and FBI separately conducted 5 percent (41 of 761) of investigations linked to CPOTs in addition to their participation in OCDETF investigations. These two agencies conducted their CPOT investigations out of their own agency's direct appropriations.

These CPOT investigations can subsequently become eligible for OCDETF funding when OCDETF's criteria are met. For example, besides being linked to the CPOT list, DEA and FBI investigations are to involve multiple law enforcement agencies, among other things, in order to qualify as OCDETF-designated CPOT investigations. Figure 4 shows the relationship among OCDETF, DEA, and FBI in their handling of CPOT investigations and shows that DEA and the FBI conduct CPOT investigations both separately and collectively with other OCDETF member agencies. Figure 4 also shows the collaborative relationship between ONDCP and Justice.

Figure 4: Federal Agencies That Conduct CPOT Investigations



Source: GAO.

Appendix III: Comments from the White House Office of National Drug Control Policy

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF NATIONAL DRUG CONTROL POLICY
Washington, D.C. 20503

January 4, 2005

Laurie Ekstrand
Director, Homeland Security and Justice
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Ekstrand:

Thank you for providing the Office of National Drug Control Policy the opportunity to review your draft report entitled *Drug Control: High Intensity Drug Trafficking Areas' Participation in International Drug Investigations*, GAO-05-122. This Office offers the following comments for your consideration and for inclusion in the final version of the report.

We are pleased your report concurs with ONDCP on the central point of the review, namely that the use of discretionary funding for the HIDTA program to support CPOT-related drug trafficking investigations is consistent with the statute authorizing the HIDTA program and with the program's mission. ONDCP firmly believes that encouraging investigations of CPOT-linked organizations is a sound strategy in areas designated as centers of illegal drug trafficking activities that are having harmful impacts in other areas of the United States.

We are also pleased that your report concluded that ONDCP awarded discretionary funding only for HIDTA CPOT-investigative activities that were consistent with the overall requirements of the HIDTA program and did not award discretionary funds for proposed activities that did not meet those requirements even if they showed a CPOT link. The members of inter-agency committee that review applications for CPOT-funding, and for other discretionary activities, are committed to ensuring the integrity of the process, and we appreciate the implicit recognition of their work.

ONDCP offers the following comments concerning the report's conclusions regarding how ONDCP distributed discretionary funds to HIDTAs for CPOT investigations and why some HIDTAs did not receive such funding.

First, the report concludes, "ONDCP Did Not Provide Sufficient Information for Some HIDTAs to Fully Develop Their Applications for CPOT Funding but Took Steps to Address These Issues." ONDCP believes the report's primary basis for this conclusion is erroneous and that the guidance and information provided was sufficient to enable all HIDTAs to fairly compete for the discretionary CPOT funding.

The report asserts that "although ONDCP's guidance stated that it included the CPOT list, ONDCP was only able to provide a partial CPOT list to officials in all HIDTAs in each of the three fiscal years it provided CPOT funding, even though applications were to include a link between their investigations and the CPOT list." In fact, in each of the three years our guidance specifically noted that only a portion of the current CPOT list was attached. Copies of that guidance, which was provided electronically to all HIDTAs, are enclosed.

In addition, because ONDCP does not have the authority to disseminate the entire CPOT list, access to which is limited to Federal law enforcement agencies, the guidance indicated where a more complete list of CPOT targets could be obtained. Specifically, ONDCP identified the Drug Enforcement Administration and Federal Bureau of Investigation field offices, and the United States Attorney's Regional Coordinator for the Organized Crime and Drug Enforcement Task Force program, as sources for the list. A representative from at least one of these agencies is a member of each HIDTA Executive Board and has access to the entire CPOT list.

Second, the report's conclusion that "Local Priorities May Not Link with CPOT Organizations" reflects a misunderstanding of ONDCP's CPOT project and the HIDTA mission. The report states that three of the 28 HIDTAs did not apply for discretionary CPOT funding because they tended to focus more on "domestic" drug enforcement than on developing links with CPOT organizations. According to the report, officials in those HIDTAs reported their biggest drug problems required focusing on local drug traffickers, investigations that in their view did not necessarily link with CPOT organizations, and that they do not always have enough funds to proceed to a level that may link the HIDTA investigation to the CPOT list.

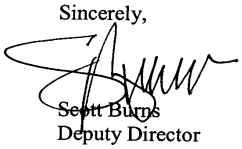
ONDCP believes that HIDTAs, given their designation as centers of illegal trafficking with drug trafficking activities that affect other parts of the country, should be focusing on investigations of activities that reach beyond the boundaries of the HIDTA. Encouraging HIDTAs to investigate CPOTs and offering additional funding to support such investigations, is consistent with the statutory requirements for designation as a HIDTA. Whether an individual HIDTA chooses to apply for these funds is a decision for that HIDTA's Executive Board.

Third, the report notes that "ONDCP's Reduction of CPOT Funding in Fiscal Year 2004 Affected HIDTA Participation." This conclusion, while accurate, is incomplete. ONDCP, as required by the report language accompanying the ONDCP's appropriations, consulted with the Congress prior to allocating the discretionary funding. As a result of those consultations, ONDCP decided to reduce the amount available for funding CPOT-related investigations in order to fund other activities. The reduction in CPOT-related funding from $16.5 million in FY 2003 to $8.0 million in FY 2004 resulted in fewer HIDTAs receiving CPOT funding (14 in 2003 v. 11 in 2004), there is no reason it should have caused a decline in applications. All HIDTAs remained eligible for funding, and to encourage applications, ONDCP's guidance for the CPOT applications identified three CPOT targets that were expected to have links with trafficking activities in all 28 HIDTAs.

We also note that the title of the report is now "High Intensity Drug Trafficking Areas' Participation in International Drug Investigations." In previous communications from the GAO, the report had been identified as "Regarding CPOT Investigations and the HIDTA Program." ONDCP believes the current title might be misleading. CPOT funding is provided for investigations of major drug trafficking organizations affiliated with CPOTs. HIDTAs do not participate in international investigations. The current title might lead some readers to believe HIDTA funding can be used to conduct or supplement investigations in Colombia or Afghanistan. We believe a more accurate title would be "High Intensity Drug Trafficking Areas' Participation in CPOT-Related Investigations."

Thank you for the opportunity to comment on the draft report. ONDCP is committed to the HIDTA program and to making it as effective as possible, consistent with the statutory intent of the Congress. We have enjoyed the interaction with GAO staff working on this project over the past year. If you have any questions about this letter or need any additional information, please contact Joseph Keefe, Assistant Deputy Director for State and Local Affairs, at (202) 395-6755.

Sincerely,



Scott Burns
Deputy Director
State and Local Affairs

Enclosures

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Appendix IV: Comments from the Department of Justice

U.S. Department of Justice

Criminal Division

Executive Office for the
Organized Crime Drug Enforcement Task Forces

Washington, D.C. 20530

January 6, 2005

MEMORANDUM

To: Laurie Ekstrand
Director, Homeland Security and Justice
Government Accountability Office

Ron Salo
Analyst-in-Charge

From: Catherine M. O'Neil
Associate Deputy Attorney General
Director, OCDETF

Subject: Department of Justice comments on draft report entitled *Drug Control: High Intensity Drug Trafficking Area's Participation in International Drug Investigations*, GAO-05-122

Thank you for the opportunity to review the Government Accountability Office (GAO) draft report entitled "Drug Control: High Intensity Drug Trafficking Area's Participation in International Drug Investigations, GAO-05-122." The draft report has been reviewed by various components of the Department of Justice, including the Organized Crime Drug Enforcement Task Forces. The Department generally agrees with the substance of your report; however, we have substantive comments that the Department believes would further clarify some portions of the draft. This letter constitutes the formal Department of Justice comments to the draft report, and it is requested that the following clarifications be included in GAO's final report.

On page 3, your report implies that the CPOT List was intentionally withheld from the HIDTAs and that their ability to apply for discretionary funding was impaired. The Department acknowledges that ONDCP was unable to provide the full CPOT List directly to the HIDTAs, but that is only because the CPOT List had been designated "law enforcement sensitive" by the law enforcement agencies responsible for developing and overseeing the list. Accordingly, distribution of the list was conducted on a limited "need to know" basis, and all copies of the list, or portions thereof, were required to be documented and tracked by the federal law enforcement entity that distributed the list. There was no intent to withhold access to the CPOT List from HIDTA personnel, however, and,

in fact, HIDTAs were provided access to the CPOT List through the various agency Special Agents in Charge and the United States Attorneys.

On page 8, the report reflects that some HIDTAs that applied for funding did not receive it because they did not have sufficient investigative resources to uncover the link to a CPOT organization. While in some circumstances this may be true, it was also often the case that the HIDTAs, while having sufficient resources to do so, simply had not yet taken the investigation far enough to establish a sufficient nexus to a CPOT that would justify the award of discretionary funds.

You state on page 10 that "ONDCP advised HIDTAs to obtain the entire list from their Justice contacts." DOJ cannot confirm or deny what was communicated by ONDCP. However, as we discussed at the exit conference, the CPOT List was available from the Special Agents in Charge of any OCDETF-member agency; this would include not only Justice components (DEA, FBI and U.S. Marshals) but also Treasury and Homeland Security agencies (i.e., ICE (INS and Customs), IRS and ATF (through 2003)).

Also on page 10, paragraph 2, you again discuss the restrictions that were placed on distribution of the CPOT List. As we discussed at length in the exit conference, these restrictions are driven by the fact that the member agencies have designated the list as "law enforcement sensitive," because disclosure of certain investigative information contained on the list might jeopardize ongoing investigations of targeted organizations. As a result, access to the full CPOT List is restricted to OCDETF-member federal law enforcement agencies. Non-participating federal agencies, HIDTA directors, state and local police officials, and other non-federal law enforcement entities, such as ONDCP, may obtain the List from U.S. Attorneys or Special Agents-in-Charge of the OCDETF member agencies on a "need to know" basis. To facilitate the distribution of discretionary CPOT funding, however, OCDETF provided a partial list to ONDCP, which contained information on some of the largest organizations and those commonly-known to, and targeted by, the law enforcement community.

On page 11, the report suggests that the distribution of the CPOT List caused a "problem" for the HIDTAs. Again, the Department acknowledges that the HIDTAs did face some difficulty. However, through participation in evaluating applications for CPOT funding, Department officials noticed that problems associated with the limited distribution of the list appeared to be confined to fiscal year 2002, when the list was first developed. In subsequent years, law enforcement agencies, including the HIDTAs, were more familiar with the CPOT List and how to gain access to it.

We appreciate your careful attention to these comments, and we remain available to answer additional questions, if necessary. If you require any additional information, please contact me directly at (202) 307-2090.

2

Appendix V: GAO Contacts and Staff Acknowledgments

GAO Contacts

Laurie E. Ekstrand, (202) 512-8777

Staff Acknowledgments

In addition to those named above, the following individuals contributed to this report: Frances Cook, Grace Coleman, David Dornisch, Michael H. Harmond, Weldon McPhail, and Ron Salo.

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