

GAO Highlights

Highlights of [GAO-24-106385](#), a report to congressional committees

Why GAO Did This Study

About 62 miles of the U.S. southwest border is located on the Tohono O’odham Nation reservation, which may be vulnerable to illicit cross-border activity. The Shadow Wolves program began operations in 1974 to address the illegal smuggling of controlled substances from Mexico to the Tohono O’odham Nation reservation in Arizona. The program contributed to hundreds of arrests and the seizure of tens of thousands of pounds of drugs between 2010 and 2020, according to ICE.

The Shadow Wolves Enhancement Act, which became law in April 2022, includes a provision for GAO to assess the effectiveness of ICE’s strategy for the Shadow Wolves program. This report assesses ICE’s (1) efforts to define the program’s mission and staffing needs, (2) strategies for recruiting and retaining Shadow Wolves, and (3) planning efforts to expand the program to other tribal lands. GAO analyzed ICE human capital documents and policies and Shadow Wolves program planning documents. GAO also surveyed the eight current Shadow Wolves and visited the Tohono O’odham Nation reservation to interview ICE officials, Shadow Wolves, and tribal officials.

What GAO Recommends

GAO is making six recommendations, including that ICE define the Shadow Wolves program’s mission, goals, and staffing needs; update its recruitment strategy to include goals and milestones; develop a succession plan to address upcoming retirements; and develop criteria for evaluating expansion locations. ICE concurred with the recommendations.

View [GAO-24-106385](#). For more information, contact Rebecca Gambler at (202) 512-8777 or GamblerR@gao.gov.

January 2024

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT

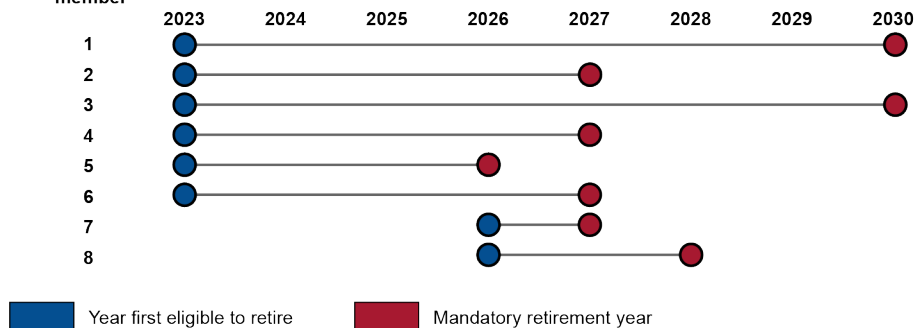
Improvements Needed to Workforce and Expansion Plans for Unit of Native American Law Enforcement Personnel

What GAO Found

Within U.S. Immigration and Customs Enforcement (ICE), the Shadow Wolves program operates on the Tohono O’odham Nation reservation in Sells, Arizona. Shadow Wolves members are required to have at least one-quarter American Indian ancestry. The program’s operating environment has changed in recent years due to advances in technology, an increase in federal law enforcement presence along the southwest border, and changes in smuggling tactics. As a result, in 2015, ICE shifted the program’s focus from interdiction—using traditional Indigenous tracking methods and technology to seize narcotics—to investigation, such as gathering evidence and serving warrants. However, the agency did not define the program’s mission, goals, or staffing needs after shifting its operations. Doing so would better position ICE to ensure that Shadow Wolves operations are having the desired impacts. Further, once ICE defines the mission and goals, determining the program’s staffing needs would better position ICE to develop recruitment efforts that help accomplish those goals.

In October 2022, ICE issued a strategy for recruiting additional Shadow Wolves, retaining existing Shadow Wolves, and expanding the program to other tribal lands. ICE’s strategy includes high-level recruitment methods, such as partnering with colleges and recruiting tribal law enforcement officers, but does not include goals, timelines, and milestones. Adding these elements would enable ICE to assess the effectiveness of the agency’s recruitment plans. Moreover, since the program has not hired any new employees since 2007 and most Shadow Wolves are eligible to retire, developing a succession plan would better position ICE to ensure experienced Shadow Wolves will be available to train new recruits.

Timeline of Current Shadow Wolves’ Retirement by Fiscal Year
Shadow Wolves member



Source: GAO analysis of U.S. Immigration and Customs Enforcement information. | [GAO-24-106385](#)

Note: Generally, federal law enforcement personnel must retire at age 57, or when they complete 20 years of certain specialized federal service after age 57.

ICE has outlined steps that it plans to take to evaluate possible Shadow Wolves expansion locations, including coordinating with tribal leaders, engaging with ICE field officials, and conducting site visits to assess the feasibility and appropriateness of expansion. However, ICE has not developed criteria for evaluating and selecting locations. Doing so would help ensure officials evaluate locations consistently and transparently.