



### Why This Matters

The Advanced Training Center (ATC) at Harpers Ferry, West Virginia, is being constructed to train U.S. Customs and Border Protection (CBP) Officers. When completed, the ATC will include tactical, academic, residential, and supporting infrastructure.

CBP entered into two Interagency Agreements (IAAs) with an Economy Act service provider, the U.S. Army Corps of Engineers (USACE), to oversee the construction of Phase IV of the ATC acquisition, valued at more than \$55 million.

### DHS Response

CBP concurred with all three recommendations to enhance CBP's oversight and management of its Economy Act service providers' performance and accountability.

## U.S. Customs and Border Protection's Advanced Training Center Acquisition

### What We Determined

CBP did not effectively oversee and manage the fourth phase of the ATC acquisition. The \$55.7 million IAA between CBP and USACE was not developed and executed according to Federal, departmental, and Component requirements. Key documentation supporting an IAA with the service provider was either missing or incomplete. CBP did not develop, review, or approve a required Independent Government Cost Estimate and Acquisition Plan prior to entering into the IAA. CBP also approved millions of dollars worth of contract modifications to the IAA without first ensuring the need and reasonableness of the modifications. As a result, CBP could not—

- Adequately justify its decision to use a service provider rather than in-house CBP personnel to manage the ATC acquisition;
- Produce a plan for overseeing the service provider's day-to-day performance; and
- Adequately justify millions of dollars worth of labor and construction funding.

CBP also used Reimbursable Work Authorizations (RWAs), rather than the ATC IAA, to execute construction project agreements with its service provider, contrary to statutory, regulatory, departmental, and Component requirements. We determined that CBP's use of RWAs for construction projects and for other unauthorized purposes was a longstanding practice that extended beyond the ATC acquisition.

### What We Recommend

We recommend that the CBP Deputy Commissioner (1) implement policies, procedures, and internal controls to increase management oversight and to ensure Component compliance with applicable requirements for IAAs; (2) develop and implement policies, processes, and internal controls to ensure CBP compliance with all requirements for RWAs; and (3) develop and implement a plan to bring all outstanding Economy Act RWAs into compliance with applicable requirements.

### For Further Information:

Contact our Office of Public Affairs at (202)254-4100, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)