

**OFFICE OF INSPECTOR GENERAL**

# **Oversight Review of the United States Coast Guard Investigative Service**



Homeland  
Security

**June 23, 2017  
OIG-17-74-IQO**



# DHS OIG HIGHLIGHTS

## *Oversight Review of the United States Coast Guard Investigative Service*

**June 23, 2017**

### **Why We Did This Review**

We conducted this review as part of the planned periodic review of the Department of Homeland Security (DHS) component internal affairs offices by the DHS Office of Inspector General in keeping with the oversight responsibilities mandated by the Inspector General Act of 1978, as amended.

### **What We Recommend**

We made 32 recommendations designed to improve operational management and help ensure investigative activities comply with applicable standards.

**For Further Information:**

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

### **What We Found**

We determined that significant issues with the agency's case management system prevented us from making substantive observations about the quality of their investigations. We noted issues with outdated policies and the absence of a Privacy Impact Assessment for the case management system. Additionally, CGIS could not provide evidence to confirm whether employees complied with special agent training requirements. CGIS employees voiced concerns about trust in senior leadership and perceived questionable hiring practices. They also articulated a need for more resources.

### **CGIS Response**

CGIS concurred with all 32 recommendations and took immediate action to resolve 3 recommendations. Additionally, CGIS initiated corrective action on 19 of the recommendations that should improve operational management and investigations. CGIS needs to further develop a resolution for 10 recommendations that remain open and unresolved.

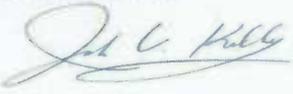


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Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

June 23, 2017

MEMORANDUM FOR: Admiral Charles D. Michel  
Vice Commandant  
United States Coast Guard

FROM: John V. Kelly   
Deputy Inspector General

SUBJECT: *Oversight Review of the United States Coast Guard  
Investigative Service*

Attached for your action is our final report, *Oversight Review of the United States Coast Guard Investigative Service*. We incorporated your formal comments in the final report.

The report contains 32 recommendations aimed at improving the United States Coast Guard Investigative Service. Your office concurred with all 32 recommendations. Based on information provided in your response to the draft report, we consider recommendations 1, 10, 11, 12, 14, 16, 19, 21, 22, and 29 open and unresolved. As prescribed by the Department of Homeland Security Directive 077-01, Follow-Up and Resolutions for the Office of Inspector General Report Recommendations, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

Based on information provided in your response to the draft report, we consider recommendations 2, 3, 4, 5, 6, 7, 8, 13, 15, 17, 20, 23, 24, 25, 26, 27, 28, 31, and 32 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions.

Recommendations 9, 18, and 30 are resolved and closed.



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

Please call me at (202) 254-4100 with any questions or your staff may contact Robert Greene at (202) 254-5429. You can also send your response to [IQO@oig.dhs.gov](mailto:IQO@oig.dhs.gov).

Attachment



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**Abbreviations**

CGIS	Coast Guard Investigative Service
CIGIE	Council of the Inspectors General on Integrity and Efficiency
DEOCS	Defense Equal Opportunity Management Institute Organizational Climate Survey
FACTS	Field Activity Case Tracking System
FEVS	Federal Employee Viewpoint Survey
LEAP	Law Enforcement Availability Pay
MOU	Memorandum of Understanding
OMB	Office of Management and Budget
OIG	Office of Inspector General
PIA	Privacy Impact Assessment
PII	personally identifiable information
SAC	special agent-in-charge
SOP	Standard Operating Procedure
USC	United States Code



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### SUMMARY

The Office of Integrity and Quality Oversight, Investigations and Program Integrity Division conducted an oversight review of the United States Coast Guard (Coast Guard) Investigative Service (CGIS) from April 2016 through November 2016. The review covered CGIS activity from October 1, 2013, to March 31, 2016. We conducted this review as part of the planned periodic review of the Department of Homeland Security (DHS) component internal affairs offices by the DHS Office of Inspector General (OIG) in keeping with the oversight responsibilities mandated by the *Inspector General Act of 1978*, as amended.

The review focused on two primary areas: organizational management and investigative work. In conducting the review, we assessed compliance with Coast Guard Commandant Instructions, the Memorandum of Understanding between the Coast Guard and DHS OIG, and referenced guidelines established by the Council of the Inspectors General on Integrity and Efficiency (CIGIE), as applicable.

In most instances, we found CGIS conducted investigations expeditiously. However, significant issues with the agency's case management system prevented us from making substantive observations about the quality of their investigations. We noted issues with outdated policies and the absence of a Privacy Impact Assessment for the case management system. Additionally, CGIS could not confirm whether employees complied with special agent training requirements.

CGIS employees voiced concerns with trust in senior leadership as well as questionable hiring practices, and a need for more resources. While many employees voiced positive opinions, others expressed dissatisfaction with management; the CGIS case management system; the amount of training received; and policies and procedures. We made 32 recommendations designed to improve operational management and help ensure investigative activities comply with applicable standards.



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**BACKGROUND**

The United States Coast Guard Investigative Service is the component of the United States Coast Guard (Coast Guard) charged with conducting investigations related to Coast Guard personnel, assets, and operations. The CGIS Director reports directly to the Vice Commandant of the Coast Guard. CGIS is divided into eight regions, each headed by a special agent-in-charge (SAC). There are 35 Resident Agent offices within the eight CGIS regions. CGIS is staffed with a mix of active duty military special agents (enlisted, warrant officer and officer), civilian special agents (1811 series), and special agents who are members of the Coast Guard Reserve.

CGIS derives its authority from Title 14 of the United States Code (USC). This authority provides for CGIS special agents to conduct investigations of criminal activity. In so doing, CGIS special agents have the authority to carry firearms, execute and serve warrants, and make arrests.

CGIS does not operate a complaint hotline for receiving and handling allegations of wrongdoing. CGIS managers explained that they typically receive allegations through the various Coast Guard offices and through emails from DHS OIG. Because of this, and limitations with their case management system, CGIS could not provide requested information on the number or type of allegations reported for the inspected period.

The DHS OIG Office of Investigations reported receiving 374 allegations related to the Coast Guard from fiscal year 2014 through the second quarter of FY 2016 and initiated investigations on 33 of those allegations. The remaining allegations were referred to CGIS. Tables 1 and 2 depict the categorized subject matter of the allegations and initiated investigations, respectively. The data shows that a majority of the allegations reported to and investigated by DHS OIG related to the Coast Guard fell in the “Miscellaneous” category.

**TABLE 1: Complaints Related to the Coast Guard  
Received by DHS OIG by Allegation Category  
FY 2014 to Q2 FY 2016**

ALLEGATION CATEGORY	QTY.	% of TOTAL COMPLAINTS
Employee Corruption	29	8%
Civil Rights Civil Liberties	26	7%
Program Fraud	52	14%
Miscellaneous	267	71%
<b>TOTAL</b>	<b>374</b>	

Source: Enterprise Data System, DHS OIG



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**TABLE 2: Investigations Related to the Coast Guard Initiated by DHS OIG by Allegation Category  
FY 2014 to Q2 FY 2016**

ALLEGATION CATEGORY	QTY.	% of INITATED
Employee Corruption	3	9%
Civil Rights Civil Liberties	1	3%
Program Fraud	7	21%
Miscellaneous	22	67%
<b>TOTAL</b>	<b>33</b>	

Source: Enterprise Data System, DHS OIG

A further analysis of the data provided by DHS OIG on allegations related to the Coast Guard revealed that the top five allegations received in the Miscellaneous category were classified as “management related,” “general employee misconduct,” “abuse of authority,” “prohibited personnel practices,” and “unspecified.” See table 3.

**TABLE 3: Most Prevalent Allegations Related to the Coast Guard Reported in Miscellaneous Categories  
FY 2014 to Q2 FY 2016**

ALLEGATION	# RECEIVED	% OF TOTAL MISC. CATEGORY
Management Related	39	15%
Employee Misconduct, General	37	14%
Abuse of Authority	31	12%
Prohibited Personnel Practices	23	9%
Unspecified / Miscellaneous	17	6%
Harassment	15	6%
Other Non-Criminal Activity	15	6%
Abuse / Violence	12	4%
General Fraud	12	4%
False Statements	11	4%
All Other Misc. Allegations	55	21%
<b>TOTAL</b>	<b>267</b>	

Source: Enterprise Data System, DHS OIG

\*percentage totals equal 101% due to rounding



## **RESULTS OF OVERSIGHT REVIEW**

### **Operational Management**

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#### **Compliance with the 2003 Memorandum of Understanding with DHS OIG**

During our review, CGIS officials were not able to demonstrate whether they consistently referred required allegations to the OIG because they did not have a documented centralized process for receiving and referring allegations nor do they capture such information in their case management system. In addition, we found CGIS' interpretation of allegations required for referral resulted in the OIG not receiving all the allegations mandated by the Memorandum of Understanding (MOU).

The Coast Guard and DHS OIG entered into an MOU in 2003, pursuant to which CGIS agreed to forward to DHS OIG any "allegations of wrongful conduct in areas of OIG investigative responsibilities" received by the Coast Guard. Additionally, the agreement stipulated that the Director of CGIS would "refer to the OIG all allegations of suspected violations that constitute fraud, waste, mismanagement, or abuse relating to programs and operations of the Coast Guard or DHS." The agreement provides several examples within the range of covered activities that are "not intended to represent an exhaustive or all-inclusive" list. The agreement mandates that the referrals "shall be made immediately upon receipt of the allegation."<sup>1</sup>

In our discussions with CGIS management, we found that CGIS management too narrowly interpreted the allegations mandated for OIG referral per the MOU. CGIS management maintained that only allegations involving financial wrongdoing required referral to the OIG. Although the MOU provides some examples of financial-based allegations, it also includes offenses such as corruption, civil rights, racial profiling, and those posing a serious danger to public health and safety. In reviewing the limited information available to us, we found that CGIS' interpretation resulted in the OIG not receiving all the allegations mandated by the MOU.

CGIS management told us that they typically receive allegations through Coast Guard Area Commanders or the OIG. When an Area Commander refers an allegation to CGIS, office personnel enter the allegations into CGIS' case management system, the Field Activity Case Tracking System (FACTS). The OIG refers allegations to CGIS by email to a point of contact at CGIS headquarters. A CGIS employee then enters the allegation into FACTS and routes it to the appropriate CGIS SAC office.

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<sup>1</sup> Memorandum of Understanding Between the United States Coast Guard and the Office of Inspector General of the Department of Homeland Security, Section VIII. Coordination of OIG External Field Investigations, Subsection (b).



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We found FACTS did not have a field in which users could document the referral of allegations to the OIG, and therefore, we could not verify whether the required referrals took place. While we were conducting our inspection, we observed an instance where a CGIS SAC called a DHS OIG SAC to discuss an allegation CGIS received. In discussing the referral process with several CGIS SACs, we were told that they often call OIG SACs directly when they receive an allegation within the MOU criteria. They informed us that they do not annotate the referral in FACTS.

The MOU also requires the Director of CGIS to provide a quarterly report to the OIG “describing the status of all open [OIG referred] Hotline Complaint investigations.” In our discussions with CGIS and OIG management, we learned CGIS has not provided such reports to the OIG. Nevertheless, we also learned that the parties have discussed the issue and CGIS is working on complying with the requirement. CGIS maintains that FACTS’s limited statistical reporting capabilities are preventing them from immediately complying.

### Recommendations

1. We recommend the CGIS Director issue policy to standardize and centralize the receipt and referral of allegations and ensure FACTS includes a field to capture when an allegation was referred to the OIG.
2. We recommend the CGIS Director articulate in policy what constitutes an OIG-referable allegation, train all necessary staff accordingly, and ensure that CGIS refers the requisite allegations to the OIG.
3. We recommend the CGIS Director provide a quarterly report to the OIG describing the status of all open Hotline Complaint investigations as mandated by the MOU.

### **Employee Workforce Assessment**

As part of our oversight review, we conducted a workforce assessment of CGIS. The assessment included analysis of the results of in-person interviews; an electronic survey administered by the review team; the Defense Equal Opportunity Management Institute Organizational Climate Survey (DEOCS) administered by CGIS in July of 2013; and the Federal Employee Viewpoint Surveys for 2014, 2015, and 2016. Overall, our analysis showed that CGIS employees did not fully trust CGIS leadership, were suspicious of questionable hiring practices, and wanted more resources. We also noted prominent concerns with CGIS policies, the case management system, and training. We address these specific concerns in their corresponding sections of this report.



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Additionally, we found that the Director of CGIS has only administered the DEOCS once, in 2013, and not on an annual basis as required.<sup>2</sup> The survey—

assesses factors surrounding the command civil rights climate, such as sexual harassment, prohibited discrimination, differential command behavior to minorities, positive equal opportunity behaviors, religious discrimination, racist behavior, overall equal opportunity climate, age discrimination, disability discrimination, work group cohesion and effectiveness, leadership cohesion, job satisfaction, trust in the organization.

We also did not see that the Director of CGIS put a plan in place to address the items of concern identified in the July 2013 DEOCS.

### Leadership

During our review, we spoke with employees at CGIS Headquarters and four field office locations. At all of the field offices visited, most employees reported positive morale. Some employees at two offices we visited spoke highly of the local leadership and described the work environment as positive and free of conflict. Employees reported feeling supported by their immediate managers and described a collaborative environment in which agents helped each other. These sentiments were echoed in the electronic survey responses where 74 percent of respondents were reportedly satisfied with their immediate management team (SAC and Assistant SAC). Several employees communicated personal satisfaction with the work they do and reported positive sentiments about their colleagues.

Conversely, only 37 percent of surveyed employees believed CGIS senior leaders generated high levels of motivation and commitment in the workforce. One employee expressed that some supervisors need leadership training. Another employee said that some supervisors use performance evaluations to hinder the careers of employees they do not like. Some employees claimed that CGIS leadership did not provide constructive feedback. Further, more than 60 percent of the negative DEOCS responses appeared to reference CGIS Headquarters as opposed to regional level management. In addition, the survey identified serious concerns with trust in senior management.

In our analysis of the Federal Employee Viewpoint Survey (FEVS) results, questions regarding the agency's senior leadership consistently scored much lower than the overall Coast Guard results. For example, in 2016, on questions mentioning senior leadership, CGIS negative responses were an average of 24 percentage points higher than Coast Guard. Another noticeable trend was that almost all CGIS responses regarding employee satisfaction were less positive than the overall Coast Guard averages for all 3 years of data.

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<sup>2</sup> Commandant Instruction M5350.4C, Coast Guard Civil Rights Manual, Section 6. DEOMI Organizational Climate Survey, p. 3-A.16



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#### Hiring and Promotions

Numerous employees expressed concerns about perceived favoritism in promotions, transfers, and bonuses. These employees attributed low morale within the agency as being a direct result of favoritism and questionable decisions made by senior leadership. Only about 50 percent of survey respondents believed that arbitrary action and personal favoritism were not tolerated in their workplace.

Some employees discussed difficulties in advancing within CGIS. These employees believed CGIS agents lack a defined career track and opportunities for promotion were elusive. In addition, some employees believed CGIS does not have grade parity with other component law enforcement agencies. For example, the assistant special agent-in-charge position in CGIS is not consistently graded at the GS-14 level as it is in other law enforcement agencies within DHS. In addition, the journeyman level for CGIS agents is lower (GS-12) than it is for other agents within DHS (GS-13).

Employees also expressed frustration at the limited GS-13 opportunities available to them. Some employees explained that sometimes CGIS selected outside applicants, who were already at the GS-13 level, for promotions. CGIS employees opined that outside applicants are viewed as more qualified than internal candidates because they come from agencies with more resources and training.

Several employees further expressed concern that the process for staffing CGIS agent vacancies effectively limits CGIS employees from getting promotions. Many vacancies are first announced internally as lateral-only positions — i.e., a CGIS applicant must already be at the vacancy's grade level (e.g., GS-13) in order to apply. If the position is not filled, it is then announced government-wide and those seeking promotions are eligible to apply. For example, a GS-12 CGIS employee could not apply to the initial internal announcement for a GS-13 CGIS position because it is deemed lateral-only. However, a GS-12 employee from a different agency could apply to the external announcement for a GS-13 CGIS position and potentially receive a promotion. The CGIS employee could apply to the same external announcement as the employee from a different agency, but CGIS employees reported that this practice effectively prevents CGIS employees from attaining promotions because of the added competition.

#### Resources

Numerous employees expressed the need for more staff in administrative and agent roles and gave examples of how limited resources affected their work. Specifically, employees complained that limited resources resulted in:

- difficulty in completing tasks without designated administrative and logistical support staff;
- employees tasked with too many collateral duties;



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- inability to obtain resources such as portable radios;
- limited funding for informants and undercover operations; and
- CGIS not having the resources needed to properly support the Coast Guard community.

One employee described the situation in the field as trying to hold things together with “scotch-tape and tooth-picks.” Another employee said the “more with less philosophy” was not sustainable and it has negatively affected employee morale and commitment. In one employee’s view, CGIS was not included in the overall Coast Guard strategic plan and resources appear when there are problems but not “to sustain the general health of the organization.”

The results of the DEOCS also identified a perceived need for additional resources (both administrative and equipment related). Similarly, more than half of CGIS respondents to the FEVS responded negatively to questions about whether they had sufficient resources (people, materials, and budget) to do their job.

Some CGIS reservists expressed dissatisfaction with the fact they were unable to access Coast Guard email accounts and that they did not have Coast Guard issued cellular phones. They claimed that they are not assigned government phones and must use their personal devices to conduct business and access email. In addition, reservists complained about having difficulty accessing CGIS emails because they did not have assigned computers and the Coast Guard email system does not have compatibility with all types of devices. Some reservists opined that it was not appropriate for them to use personal devices to conduct business and believed the agency could benefit from them having access to their email accounts.

### Other Concerns

The DEOCS identified a high percentage of unfavorable responses in regards to organizational processes and leadership, centered on inadequate funding and resources; lack of adequate policy; poor communications; and a perception of favoritism and/or unfair treatment. The FEVSs identified other areas of significant concern, such as the case management system; advancement opportunities; the case referral process; amount of training received; and policies and procedures.

### Recommendations

4. We recommend the CGIS Director follow the requirements to administer the DEOCS on an annual basis. We further recommend the CGIS Director develop and implement a corrective action plan to address concerns learned through the DEOCS.



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5. We recommend the CGIS Director conduct an analysis to determine whether CGIS agents are compensated consistent with their peers within DHS and make changes as necessary.

### **Policy**

We found that CGIS' primary policy manual, the *Coast Guard Investigations Manual*, COMDTINST M5527.1B (Investigations Manual), was largely out of date. Yet, CGIS management was actively working to repeal the manual and replace it with current Standard Operating Procedures (SOP). As of the end of September 2016, CGIS had issued 15 of the approximately 93 planned SOPs. However, according to the *Coast Guard Directives Systems Manual*, M5215.6H (Systems Manual), SOPs are used to further explain existing policy and should not be used in place of policy. The Systems Manual presents several formats appropriate for memorializing policy.

The Investigations Manual promulgates internal policy guidance, responsibilities, authority, and instructions for the administration of the investigations and personnel security programs within CGIS. CGIS implemented the manual in July 2001 and made a formal interim change to chapter 6 of the manual in September 2001. Reportedly, CGIS also made several interim changes through less formal methods, but has not formally reviewed the manual every 4 years, as required by the Systems Manual.<sup>3</sup>

CGIS management reported that up until mid-2015, adjustments to policy were made using "Director's Notes", which were emails or memorandums from the CGIS Director. According to CGIS management, CGIS communicated changes in policy in this manner, but did not formally incorporate these notes into the manual. In addition, CGIS did not consistently maintain policy changes in a central location available to all employees. This practice made it difficult for CGIS to ensure employees knew and followed requirements.

Many CGIS employees expressed frustration with the lack of updated guidance, which has resulted in confusion over requirements. Several employees voiced the need for more extensive and clearer policies. Specifically, these employees were concerned with the lack of clear or updated policy regarding firearms and use of force. Employees suggested CGIS solicit feedback from the field and use working groups, made up of CGIS employees, to develop and draft policies. One employee recommended CGIS use committees based on subject matter expertise, such as firearms personnel working together to create the firearms policy.

The inspection team observed that CGIS maintained completed SOPs in a SharePoint site accessible to applicable CGIS employees. In our discussions with staff, however, we learned that some employees were confused about

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<sup>3</sup> *Coast Guard Directives Systems Manual*, M5215.6H, pp. 1-2



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whether the SOPs superseded the instructions in the Investigations Manual, simply augmented the instructions, or served another purpose. Some employees felt uneasy about adhering to the SOPs because they were not vetted and published through the Coast Guard Directives System and because CGIS did not formally repeal the Investigations Manual.

The Coast Guard Directives and Publications Division, CG-612, is charged with overseeing the Coast Guard Directive's System. In our consultation with them and review of the Systems Manual, we learned that CGIS is the sponsor of the Investigations Manual and therefore can cancel it as warranted. We also discovered that CGIS incorrectly used SOPs to replace the Investigations Manual. The Systems Manual defines SOPs as "a set of instructions covering those features of current operations that lend themselves to a definite or standardized procedure without a loss of effectiveness." It further states that SOPs are developed "to ensure correct adherence to internal procedures."<sup>4</sup> CG-612 explained that SOPs are used to further explain existing policy and should not be used in place of policy. The Systems Manual presents several formats appropriate for memorializing policy.

In conducting interviews with CGIS management and employees, we noted that CGIS did not consistently consult with Coast Guard functional areas in drafting new policies. Specifically, we found minimal evidence that Coast Guard Judge Advocate attorneys evaluated SOPs prior to issuance. This practice could result in CGIS enacting policies that are inconsistent with laws and Coast Guard and DHS policy. The Systems Manual outlines a clearance process for policies to allow for coordination by organizational elements that have a substantial interest in the proposed policy.

### Recommendations

6. We recommend the CGIS Director, in consultation with the Coast Guard Directives and Publications Division, CG-612, replace the existing Coast Guard Investigations Manual with a document that complies with Systems Manual requirements.
7. We recommend the CGIS Director continue to update investigative policy and follow the Coast Guard clearance process outlined in M5215.6 prior to issuing new policy.

### **Case Management System**

CGIS began using FACTS as their primary case management system on July 1, 2014, and subsequently made several updates to the system. In conducting our review, we found that CGIS did not conduct a Privacy Impact Assessment (PIA) for FACTS prior to its implementation. Section 208 of the *E-Government*

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<sup>4</sup> *Coast Guard Directives Systems Manual*, M5215.6H, pp. 1-2



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*Act of 2002* requires all Federal Government agencies to conduct a PIA for all new or substantially changed technology that collects, maintains, or disseminates personally identifiable information (PII). Through discussions with CGIS and Coast Guard officials, we learned that CGIS is in the process of conducting the assessment.

The DHS Privacy Office published its *Privacy Impact Assessments Official Guidance* in 2006 that explains that a PIA is used to demonstrate that system owners and developers have consciously incorporated privacy protections throughout the entire life cycle of a system. It further explains that a PIA analyzes how personal information is collected, used, stored, and protected by the Department and examines how the Department has incorporated privacy concerns throughout its development, design and deployment of the technology or rulemaking.

The guidance also explains that PII is “information in a system, online collection, or technology: (i) that directly identifies an individual (e.g., name, address, social security number or other identifying number or code, telephone number, email address, etc.) or (ii) by which an agency intends to identify specific individuals in conjunction with other data elements, i.e., indirect identification.” It further explains, “As found in the Office of Management and Budget (OMB) Memorandum M-03-22, these data elements may include a combination of gender, race, birth date, geographic indicator, and other descriptors.”<sup>5</sup> The information contained in FACTS includes PII (including names, dates of birth, and social security numbers) and, therefore, is subject to applicable rules.

During our review, we assessed whether CGIS obtained the proper accreditation to operate FACTS. In consultation with Coast Guard, we learned that they accredited the system prior to implementation and continue to support its information technology needs.

The DHS Certification and Accreditation process is used by DHS to assure its systems meet appropriate system and operating standards. The *DHS Security Authorization Process Guide* outlines the progression that DHS components must follow to secure authorization for an information system to operate within DHS. The guide mandates that all unclassified systems, including General Support Systems and Major Applications, in the *DHS Federal Information Security Management Act* inventory must be assessed and authorized in accordance with the process identified in this guide. In addition, all sub-systems and minor applications must be documented in the security authorization package of an associated General Support Systems and Major Applications.<sup>6</sup>

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<sup>5</sup> *Privacy Impact Assessments Official Guidance*, Information Covered by PIA, pp. 10-11

<sup>6</sup> *DHS Security Authorization Process Guide*, Section 1.3, p. 2



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FACTS was an area of significant dissatisfaction among many employees we interviewed and surveyed. One employee named FACTS “the single biggest morale issue within CGIS.” Many employees complained that CGIS did not conduct a needs-analysis or properly assess the system’s capabilities prior to its purchase. Numerous employees also complained that CGIS put FACTS into operation without defined policies on how to use it and there continues to be no comprehensive manual.

CGIS management explained that prior to fielding FACTS they sent some criminal investigators to visit police departments around the country who were using the system. The investigators got the opportunity to see how different policing agencies used the system and then contributed to CGIS’ efforts to customize it to their needs. CGIS management also explained that they have routinely held working group meetings with key employees in order to solicit ideas for improving the system. They have worked with the FACTS contractor to make changes to the system and are working on a policy manual for FACTS.

We found FACTS to be a robust system with the potential to serve its intended purpose. FACTS contained most, though not all, of the appropriate fields to capture basic information related to allegations and investigations. However, the use of FACTS between offices is not standardized, resulting in differences in what information was entered, where it was entered, and how it was structured. For example, the case narrative paragraph, the purpose of which is to provide a synopsis of the investigation, in some cases provided a complete summary of the investigation, but in other cases merely presented the allegation. The unstandardized usage of FACTS also resulted in problems with data captured within it. We found some fields were not consistently utilized which caused disparities in the data collected. Some employees reported that the statistical data extracted through FACTS was unreliable. One employee estimated that the statistical data pulled from FACTS was at best 60 percent reliable.

We discussed our concerns with CGIS management who asserted that they were working to standardize the use of FACTS and improve the quality of data. While we were conducting our review, CGIS had a multi-day “stand-down” where FACTS users were instructed to update various fields in an attempt to standardize the collected information. Several CGIS employees reported that there had been other such days since FACTS was implemented. Unfortunately, some employees considered these “stand-downs” frustrating and time consuming. Some employees questioned the purpose and relevance of entering biographical information into closed cases, especially since in many instances, collecting such information would require re-contacting affected individuals.

Despite the negative feedback regarding FACTS, some employees believed FACTS was a best practice and noted it was better than the previous CGIS case management system. Employees believed better guidance and more training with the system would improve usability. Other employee suggestions included



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better oversight and coordination, more formal training, and using FACTS to track evidence.

### Recommendation

8. We recommend the CGIS Director ensure that a Privacy Impact Assessment is conducted for FACTS and that all related requirements are properly addressed.
9. We recommend the CGIS Director develop and publish a policy manual for FACTS to standardize, at a minimum, what fields must be completed and the type of information needed in each field.
10. We recommend the CGIS Director provide training to FACTS users on navigating the system and policy requirements.

### **Law Enforcement Availability Pay**

We found conflicting Law Enforcement Availability Pay (LEAP) records maintenance policies. As such, CGIS management does not consistently maintain LEAP records. We were therefore unable to determine whether all subject employees met the minimum LEAP requirements. We were also unable to determine, because of inconsistent record keeping, whether employees complied with LEAP certification standards.

Specifically, section K-4 of the Investigations Manual instructs Regional SACs to maintain LEAP Worksheet and Certification forms for 3 years. Section F of the manual contradicts these instructions by stating that Regional SACs should maintain the records for only 1 year. One of the four field offices we visited could not provide any records regarding LEAP. Another field office was able to provide annual certifications for a single year, and average daily LEAP calculations for 3 years. Two of the field offices we visited were able to provide all LEAP records and certifications for the reviewed period. Some SACs told us that LEAP records were maintained in a shared intranet site, but no one was able to locate LEAP records on the site.

Title 5 USC § 5545a(d)<sup>7</sup> stipulates that a criminal investigator shall be paid availability pay, if the annual average of unscheduled duty hours worked by the investigator is equal to or greater than 2 hours per regular work day. The law requires that each criminal investigator receiving availability pay and the appropriate supervisory officer make an annual certification to the head of the agency that the investigator has met, and is expected to meet, the

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<sup>7</sup> Title 5 USC § 5545a, *Availability pay for criminal investigators*



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requirement.<sup>8</sup> CGIS could not provide documentation to show that all applicable employees consistently met either of these requirements.

### Recommendations

11. We recommend the CGIS Director determine the appropriate amount of time for the maintenance of LEAP records and clarify contradictory policy regarding the same.
12. We recommend the CGIS Director ensure that LEAP eligible employees maintain an annual average of unscheduled duty hours equal to or greater than 2 hours per regular work day. We further recommend that the CGIS Director ensure LEAP eligible employees certify initially and on an annual basis that they have met and will continue to meet the minimum LEAP requirements per Title 5 USC § 5545a(d).

### **Training**

CGIS could not provide documentation showing that employees consistently met all training requirements during the reviewed period. The Investigations Manual makes multiple references to “agent’s headquarters training records,” but we were told that CGIS headquarters does not require field offices to report individual training to headquarters. CGIS headquarters provided some records from the Training Management Tool centralized system. However, CGIS field offices are not required to enter information into the system, making that data inconsistent and unreliable.

In attempting to assess compliance with semi-annual pistol qualification requirements for the period inspected, we learned that CGIS does not maintain records in a centralized location. The records are instead maintained at individual SAC offices in varying formats and for varying periods. For example, some offices maintained records for multiple years while one office was only able to provide qualification records for 1 year. Although not able to assess full compliance with semi-annual pistol qualification requirements, we determined that firearms instructors in the offices we visited were vigilant in ensuring that applicable personnel met qualification requirements. For instance, firearms instructors maintained meticulous regular training schedules.

We encountered similar challenges in assessing compliance with shotgun and rifle qualification requirements. CGIS staff informed us that criminal investigators could determine for themselves whether they wanted to qualify and use either weapon. The Investigations Manual states, “Special Agents will re-qualify semi-annually in order to remain eligible to utilize [12-gauge shotguns].” The manual does not set requirements for qualification with the

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<sup>8</sup> 5 USC § 5545a(e)(1)



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rifles that we observed in CGIS' inventory. CGIS staff told us that they apply the same training requirements to both weapons. It was not clear to us, given the documentation available, that the agency had adequate controls over who qualified and was eligible to use these weapons. This may increase risk for CGIS when assigning roles and equipment for tactical law enforcement operations, such as search warrants, or responding to emergencies, such as an active threat situation.

CGIS could not provide documentation showing that agents received periodic legal updates or defensive tactics training during the inspected period. Only one office had records of Federal Aviation Administration Flying Armed training and one office provided a memorandum verifying eight agents received use-of-force training in 2014. Similarly, we found no corresponding policies asserting that this training should be conducted on a recurring basis, contrary to common practice in DHS. The Investigations Manual mandates that "special agents receive training in the Coast Guard's Use-of-Force policy prior to being issued a Coast Guard weapon..." but does not mandate periodic training.<sup>9</sup> CGIS management reported that they have begun providing this training to agents on a recurring basis. They additionally informed us that they are writing policies associated with our observations.

Although CGIS is not directly subject to CIGIE directives, it states on their website that CGIS follows CIGIE's guidance on training. CIGIE's *Quality Standard for Investigations* provides that firearms familiarization and qualification should be conducted on a quarterly basis and the guidelines recommend the following:<sup>10</sup>

Periodic Training Requirements—periodically train criminal Investigators on effective and appropriate use of force and constitutional law and other topics articulated in the Attorney General Guidelines or other authoritative guidelines.

Additional topics to consider are new laws and court decisions affecting operations; technological improvements; and any changes in agency and national level policies, procedures, rules, and regulations (e.g., Transportation Security Administration (TSA) training on "flying while armed").

All post-basic training should be part of a systematic, progressive, and documented plan to maintain the requisite knowledge, skills, and abilities. Deliver such training depending on the organization's needs and mission requirements. The frequency and nature of such training may be

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<sup>9</sup> *Coast Guard Investigations Manual*, COMDTINST M5527, Section 6-J-7, Use-of-Force Training Policy, pp. 6-21.

<sup>10</sup> CIGIE *Quality Standard for Investigations*, Periodic Training Requirements, p. 6



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adjusted depending on whether the investigator is in a primary or secondary position.

Policies should determine the frequency of, and ensure compliance with, its recurring and periodic training, which, absent unique circumstances, should not exceed 3 years.

While conducting the workforce assessment, we learned that most CGIS employees were satisfied with the quality of training they received. However, we heard mixed views on employee satisfaction with the amount of training they received. Some employees noted the need for agents to attend training in advanced investigative techniques or specialty areas. Several employees voiced concerns that limited training in specialty areas put them at a disadvantage for promotions. These employees stated that CGIS agents cannot compete with better-trained agents from other agencies. Some employees noted difficulty in getting access to training because of limited availability, especially for reservists. Other employees noted difficulties in obtaining approval for external training because of budget constraints.

### Recommendations

13. We recommend the CGIS Director develop a structured training program to include:

- oversight to ensure appropriate compliance with all training requirements;
- policies and procedures to ensure all law enforcement personnel periodically qualify on all issued firearms and all weapons (shotguns, rifles) accessible through their posts of duty;
- policies and procedures regarding the proper documentation of all training to ensure compliance with basic, post-basic, recurring, and periodic training requirements; and
- policies and procedures regarding periodic training requirements for use of force, and essential law enforcement areas, such as legal updates, arrest techniques, defensive tactics, flying while armed, and intermediate weapons.

### **Firearms and Ammunition**

We inspected the CGIS firearms and ammunition stored at the four field offices we visited as well as CGIS Headquarters. We also inspected 48 firearms assigned to personnel at those locations. We were able to match all but three inspected firearms to office inventory records. Two agents had weapons with serial numbers not listed on their offices' inventory records because they were



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newly assigned to the office. One agent showed us a weapon with a serial number that differed from what was on the office inventory. Additionally, we found an unassigned shotgun stored in the headquarters safe that belonged to a field office and two unassigned rifles. Although stored in a safe, the weapons were not assigned to an individual with oversight responsibility, and the safe was accessible to at least two people. This could pose a serious inventory control issue.

We also learned from CGIS Headquarters staff that most special agents are assigned two pistols. Some of the agents we talked to elected to carry only one. Some opted not to take possession of the second weapon while others obtained the second weapon, secured it, but did not carry it. The practice of assigning a second weapon to agents who do not intend to carry them may lead to problems with accountability and is a waste of agency resources.

Additionally, we observed instances where agents who were assigned two weapons only qualified with one of them. We found that CGIS did not have a policy in place to ensure that agents who were assigned two weapons qualified with them in accordance with agency policy.

We also learned from CGIS senior management that three handguns had been lost over the inspected period. All three occurrences were documented appropriately.

#### Ammunition

We examined and verified inventories for the ammunition on-hand at each field office we visited. We were able to account for all ammunition assigned to the field offices. The office firearms instructor maintained the ammunition and inventory logs at each office. Each instructor inventoried the ammunition at least monthly; some conducting inventories after every use.

A recurring issue we heard from the firearms instructors was that there was not enough ammunition provided to maintain quarterly training requirements. The Investigative Manual mandates that “regional SACs are to maintain a quarterly firearms training program.”<sup>11</sup> CGIS staff reported they do not receive enough ammunition to conduct quarterly training and routinely do not have enough to rotate the ammunition carried by agents. Some agents reported being concerned that they have not been issued new ammunition in several years. CGIS senior management acknowledged that this was a problem that affected the field offices’ ability to complete required quarterly firearms training.

#### Recommendations

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<sup>11</sup> *Coast Guard Investigations Manual*, COMDTINST M5527, Section 6-J-5, Weapons Training and Qualifications, p. 6-20



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14. We recommend the CGIS Director ensure that all firearm inventories are updated as changes occur, and the appropriate firearms custodian secures all unassigned weapons.
15. We recommend the CGIS Director evaluate the practice of assigning two handguns to every agent. We further recommend that if the CGIS Director continues to assign two handguns per agent, he implement policies to ensure that agents only carry weapons with which they have qualified.
16. We recommend the CGIS Director ensure that agents have enough ammunition to comply with quarterly firearms training requirements, and to rotate ammunition carried in their duty weapons on at least a bi-annual basis.

### **Property**

Overall, we found that the field offices we visited conducted the required property inventory but did not maintain property in an organized manner. Although we ultimately located most items, we noted uncertainty in each office as to where items were physically located.

During our field office property inspections, we noted that each office had a designated property/technical equipment coordinator. Additionally, each of the offices had completed a property inventory in the past year, as required. One office noted that property was stolen, and the office appeared to have taken measures to appropriately report the issue. We also found minor security issues with storage. One of the field offices stored some accountable property in a closet that did not lock.

The types of property and technical equipment we reviewed included law enforcement and information technology equipment. We inventoried items on hand and compared that with CGIS property reports. Overall, the offices maintained most of the property that appeared on the reports. There were instances where an inspected office transferred property, but the items remained on the inventory records. Although we ultimately located most items, in some cases, it took several days to find outstanding items. One office had several items that employees were unable to locate. Some of the inventory problems may have occurred due to a recent office move.

### Recommendations

17. We recommend the CGIS Director ensure field offices maintain an organized and updated property inventory system that would support a timeline for updating inventory records once items have been transferred or removed from an office.



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18. We recommend the CGIS Director require all equipment not assigned to individuals be stored in a locked area with limited access.

### **Confidential Funds and Informants**

When discussing confidential funds with Headquarters personnel and field office staff, we learned that both are concerned with the small amount of funding for the program. In addition, CGIS uses an office debit card program that streamlines confidential fund payments, but it is costly to maintain. Although all field offices have a confidential funds custodian, not all offices had an alternate confidential funds custodian. Lastly, three of the four field offices we visited had active confidential informants during the inspected period, with two of those offices missing required paperwork for their informants.

#### Confidential Funds

CGIS management informed us that per current legislation, CGIS confidential funds are to be “no more than \$45,000 of appropriated funds.” They explained that this is not enough to fund all of the confidential informant work that CGIS conducts and reported that they spend all of the allocated funds every year. CGIS senior management speculated that they could have spent the entire allocation in the first couple of months of 2015 and 2016 if it were not for their process of highly scrutinizing each fund request. CGIS management is attempting to increase the funding amount through a proposed legislative change.

In 2015, CGIS implemented an electronic procedure for processing confidential fund requests and payments. We consider the procedure to be a best practice in that it eliminates the need to keep cash on hand and requires all transactions to be approved by two individuals at CGIS Headquarters. However, we found the bank fees incurred by the agency seemed excessive given the amount of money involved and number of transactions. We also found one office did not have an alternate confidential funds custodian as required. This position is important in the event confidential funds are needed and the primary custodian is not available.

In addition, we found only one instance in the selected transactions we reviewed where confidential funds were expended during the inspected period. The funds expended were for a payment to a confidential informant; however, the transaction was not properly documented on the required form. Without proper documentation, we were not able to validate whether the payment was made.

#### Confidential Informants



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Of the four field offices we visited, three had active confidential informants during the inspected period. Two of the inspected offices did not maintain all the paperwork required for these informants, to include the semi-annual suitability updates, the CGIS Agreements to Provide Information Form, and the CGIS Confidential Informant Program Provision Form.

### Recommendations

19. We recommend the CGIS Director research banking options for the confidential fund account that incur fewer fees.
20. We recommend the CGIS Director ensure all offices have a confidential funds custodian as well as an alternate.
21. We recommend the CGIS Director ensure all confidential fund transactions are properly documented.
22. We recommend the CGIS Director ensure all paperwork is complete for all confidential informants.

### **Evidence Review**

The inspection team found that at the four CGIS field offices visited, evidence was stored in secured and locked locations with limited access, as required by Chapter 11 of the Investigations Manual. Some CGIS field offices also maintained a large amount of evidence at off-site locations due to limited storage space at the office. At least two of the off-site locations were movable trailers that are not suitable for the storage of evidence, as they cannot be properly secured.

CGIS utilizes two types of evidence custody logs, the Property Evidence Custody Log and the Narcotics (controlled substances) Evidence Custody Log. The Evidence Custody Logs were designed to establish the necessary control and maintenance of evidence while under the control of CGIS and in conjunction with the Evidence Custody Form. Required information for the Evidence Custody Form includes article name and number, storage location, and submitting agent's name. While verifying physical evidence against Evidence Custody Logs, we found a few instances where the evidence article name or case number was not included in the form as required.

One of the field offices we visited used the FACTS evidence module to process and maintain evidence inventories. We found that the evidence reports from FACTS were incomplete. Specifically, the FACTS evidence reports cut off the action number and did not include a field for storage location, case number, or the most recent inventory date. We learned that the FACTS evidence module is not being utilized across the agency because CGIS has not received clearance



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from the Coast Guard. CGIS purchased the necessary equipment to use the capability, but it is not able to implement it. An employee explained the module would make maintenance of evidence inventory much easier.

All offices visited had assigned evidence custodians and maintained a chain of custody as required by the Investigative Manual. We found CGIS field offices, in most instances, documented their evidence inventories. Nevertheless, we noted that one office went more than 2 years between conducting inventories, even though the CGIS manual requires an inventory of evidence every 6 months. In addition, we found two instances where custodians did not update the logs when transferring evidence.

As part of our inspection, we selected a sample of evidence at each field office we visited and physically verified its existence. In our review, we found evidence custodians did not always verify the contents of sealed evidence bags. In addition, we found evidence in unsealed or ripped bags. Specifically, one field office had two pieces of evidence in ripped bags. In another instance, we found an unsealed bag of narcotics and, upon handling it, found that the narcotics were falling out of the bag.

During our inspections, we learned that custodians did not periodically weigh narcotics evidence as part of inventories. "Controlled substances must be logged by weight," according to the Investigations Manual<sup>12</sup>; and it is a law enforcement best practice to reweigh narcotics during evidence inventory.

### Recommendations

23. We recommend the CGIS Director ensure that all evidence is inventoried every 6 months as required.
24. We recommend the CGIS Director ensure the Evidence Custody Logs contain the required information.
25. We recommend the CGIS Director ensure the FACTS system has the necessary fields to input and readily view the required and essential information for evidence.
26. We recommend the CGIS Director establish a transition plan before requiring CGIS locations to enter evidence into FACTS and provide employees with clear instructions on how to use the system for logging inventory to ensure consistent and accurate evidence record keeping across CGIS.

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<sup>12</sup> *Coast Guard Investigations Manual*, COMDTINST M5527, Section 11-F-1, Evidence Storage, Shipment and Accountability, pp. 11-18.



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27. We recommend the CGIS Director ensure evidence, including narcotics, is properly sealed to protect the integrity of evidence.
28. We recommend the CGIS Director revise guidance to ensure evidence custodians verify contents of evidence bags and weigh narcotics as part of the periodic inventory of evidence.
29. We recommend the CGIS Director ensure that all evidence is secured in structures suitable for the storage of evidence.

### Investigations

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Issues with FACTS impeded our review of CGIS' investigative work. CGIS could not provide us a list of investigations worked during the inspected period so that we could obtain a representative sample to review. The list provided by CGIS included instances where CGIS had performed non-investigative duties. We ultimately reviewed 60 closed investigations. See Appendix A: Objective, Scope, and Methodology, for a full description on our case sample selection process. Because of limitations with the data in FACTS, we were not always able to make conclusive determinations about the areas studied.

Overall, CGIS conducted investigations in an expedient manner. The average investigation in our sample was completed and referred to a higher authority within 116 days of initiation. However, there was some confusion among the people we spoke to regarding when an investigation was actually closed. Prior to 2012, an investigation would remain "open" until adjudication by area commanders, courts, or other authority. In 2012, CGIS determined that they would consider an investigation "closed" when initial investigative work was complete. They reasoned that the investigation at that point was no longer under CGIS' control, and therefore, they should not be accountable for the time it took to process the case further. They also argued that CGIS was frequently not told when a case was finally adjudicated, and therefore, investigations appeared in an open status when in fact they had been closed. CGIS management reported that they have proposed giving applicable Coast Guard entities access to FACTS so they could document when a case is closed.

The current practice of labeling an investigation closed after the initial investigation is complete does not accurately account for all investigative work done on a case. Frequently, prosecutors and other appropriate authorities ask CGIS investigators to conduct investigative work after an investigation is referred to them. In fact, we observed such examples in the sample we reviewed. The current practice also does not account for time investigators may spend briefing prosecutors or testifying at trial or other hearings. Because of this practice and the fact that CGIS does not collect information on the final



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adjudication of a case, we were unable to evaluate the true length of time it took to process an investigation.

We found that CGIS management actively participated in most investigations and continually conducted reviews of agents' work. We observed that periodic reviews of investigations occurred in 40 of the 43 applicable cases. We could not determine whether such reviews had occurred in 17 cases because the information was not available in FACTS.

CGIS did not conduct any Title III investigations during the inspected period. They did participate in such investigations with other law enforcement agencies.

Due to the significant lack of information and documentation within FACTS, we could not accurately determine whether rights advisements were given in every applicable instance. For example, in 15 instances we found indications that subject interviews were conducted, but found no mention of whether rights advisements were given. Similarly, we did not find an executed rights advisement form uploaded into FACTS for these cases.

### Recommendations

30. We recommend the CGIS Director evaluate the policy on when investigations are deemed to be closed to ensure that all investigative activity is completed prior to closing the investigation.
31. We recommend the CGIS Director ensure that the proper rights advisements are given in every applicable instance and that such actions be documented in FACTS.

### **Investigative Reports**

The inspection team found that CGIS does not produce comprehensive investigative reports. This made it difficult to assess whether an investigation was conducted thoroughly and whether all allegations were properly explored. A case report simply consisted of a summary paragraph and a collection of activity reports. In our observation, the summary paragraph was not standardized and typically did not provide a detailed summation of the facts and findings of the case. Several summary paragraphs we saw were only one or two sentences long and did not annotate the final disposition of the investigation.

As a best practice, CIGIE provides the following guidelines, in part, for investigative reports:



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1. In any report, the facts should be set forth to facilitate reader comprehension. This should include a clear and concise statement of the facts and applicable law, rule, or regulation that was allegedly violated or that formed the basis for an investigation.
2. The principles of good report writing should be followed. A quality report will be logically organized, accurate, complete, concise, impartial, and clear and should be issued in a timely manner.
3. Reports should contain exculpatory evidence and relevant mitigating information when discovered during any administrative investigation. Exculpatory evidence in a criminal or civil investigation must be brought to the attention of the assigned prosecutor.
4. Evidence outlined in a report should be supported by documentation in the investigative case file.
5. In some cases, it may be appropriate to note specific allegations that were not investigated to ensure that decision makers can take further action as they deem appropriate.
6. The outcome or accomplishment (fines, savings, recoveries, indictments, convictions, suspensions and debarments, or management recommendations, etc.) should be documented in the file.

### Recommendation

32. We recommend the CGIS Director ensure that comprehensive reports that comply with CIGIE guidelines are produced for each investigation.



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**Summary of Recommendations, CGIS Response, and OIG Analysis**

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**We recommend that the Director of CGIS:**

**Recommendation #1:** Issue policy to standardize and centralize the receipt and referral of allegations and ensure FACTS includes a field to capture when an allegation was referred to the OIG.

CGIS Response: Concur. CGIS is reviewing [its] policies and allegation receipt processes to ensure that FACTS includes a field to indicate when an allegation has been referred to the OIG. The current business intelligence system built into the CGIS Records Management System (RMS) does provide ability to locate cases that either originated from the OIG (e.g., came into the OIG hotline and were referred to CGIS by the OIG) or originated within the USCG but require notification to the OIG because of their nature. [CGIS concurred] that the creation of a specific searchable field in the RMS would enhance the search function for these cases and CGIS will work to incorporate that function in the FACTS upgrade. Estimated Completion Date (ECD): September 30, 2017.

OIG Analysis: CGIS' response only partly addresses the recommendation. Although the recommendation adequately addresses the issue with FACTS, it does not explain what CGIS intends to do regarding standardizing the process of receiving and referring allegations. This recommendation is open and unresolved pending further action by CGIS.

**Recommendation #2:** Articulate in policy what constitutes an OIG-referable allegation, train all necessary staff accordingly, and ensure that CGIS refers the requisite allegation to the OIG.

CGIS Response: Concur. While CGIS works to closely follow the terms of the Memorandum of Understanding (MOU) with OIG, CGIS agrees to develop an appropriate policy statement implementing the guidance provided in the MOU and will conduct appropriate training on that policy. ECD: June 1, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence that they have issued appropriate policy and conducted training accordingly.

**Recommendation #3:** Provide a quarterly report to the OIG describing the status of all open Hotline Complaint investigations as mandated by the MOU.

CGIS Response: Concur. CGIS concurs that a quarterly report would improve the communications between CGIS and OIG regarding the status of Hotline Complaint investigations and will develop such a report. ECD: June 30, 2017.



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OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence that they have developed the mandated report.

**Recommendation #4:** Follow the requirements to administer the DEOCS on an annual basis. We further recommend the CGIS Director develop and implement a corrective action plan to address concerns learned through the DEOCS.

CGIS Response: Concur. The CGIS Deputy Director of Mission Support has specifically requested a DEOCS survey and will encourage employee participation from [its] active duty, reserve, and civilian workforce. CGIS will develop and execute a corrective action plan as necessary based on the survey results. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence that they have administered the survey and developed a corrective action plan as necessary.

**Recommendation #5:** Conduct an analysis to determine whether CGIS agents are compensated consistent with their peers within DHS and make changes as necessary.

CGIS Response: Concur. Prior to the OIG inspection, CGIS requested an analysis to identify skill gaps, analyze compensation, and build staffing models to address this recommendation. CGIS is actively engaged with the Coast Guard Assistant Commandant for Human Resources (CG- I) to finalize this analysis and will implement corrective actions as necessary pending the results. ECD: October 31, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence of their analysis and subsequent action.

**Recommendation #6:** Consult with the Coast Guard Directives and Publications Division, CG-612, and replace the existing Coast Guard Investigations Manual with a document that complies with Systems Manual requirements.

CGIS Response: Concur. CGIS has assigned a senior special agent (GS-14) as the Assistant Director for Policy (ADP) to update the Investigations Manual. Since 2015, the ADP has periodically issued operating procedures which supersede various provisions of the Investigations Manual. This system of periodic updates, whether by Director's Note, Criminal Investigation Operating Procedure, or Mission Support Operating Procedure, is fully consistent with the Coast Guard's Directives and Publication System. To improve CGIS' awareness



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of the updates, the ADP intends to submit a Commandant's Change Notice informing subordinate CGIS commands of all changes that have occurred since 2015. Additionally, CGIS intends to coordinate with CG-612 and Force Command (FORCECOM) to issue a revised Commandant Instruction Manual on Investigations and promulgate operating procedures as techniques, tactics, and procedures (TTP) in accordance with FORCECOM guidance. ECD: September 30, 2018.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence of their notification to CGIS commands and the publication of a revised manual.

**Recommendation #7:** Continue to update investigative policy and follow the Coast Guard clearance process outlined in M5215.6 prior to issuing new policy.

CGIS Response: Concur. As noted during the inspection, the CGIS Investigations Manual was last updated in 2001 and requires modernization. From 2001 until 2013 the manual was revised via "Director's Notes". Starting in 2014, CGIS committed significant resources to updating the manual and created a full-time Assistant Director for Policy (ADP) in 2015. The ADP is in the process of submitting a Commandant's Change Notice informing subordinate CGIS offices of all changes, Standard Operating Procedures (SOP) and Director's Notices (DN) that are in effect. The ADP also updates policies and SOPs in a deliberative and ongoing process in coordination with CG-612, Force Command (FORCECOM), and the CGIS embedded legal counsel. The ADP will issue a revised Investigations Manual and continue to promulgate operating procedures as techniques, tactics, and procedures (TTP) in accordance with FORCECOM guidance. ECD: September 30, 2018.

OIG Analysis: Although CGIS' response meets the intent of this recommendation, we caution that the continued practice of issuing Director's Notes and Standard Operating Procedures without storing them in a central location will continue to cause confusion among staff. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence of their notification to CGIS commands, the publication of a revised manual, and communication with CG-612 and USCG (not CGIS) legal counsel.

**Recommendation #8:** Ensure that a Privacy Impact Assessment is conducted for FACTS and that all related requirements are properly addressed.

CGIS Response: Concur. Prior to the implementation of FACTS, a Privacy Impact Assessment (PIA) was conducted for MagNET, the information technology system that FACTS resides on. At that time it was not realized that an additional PIA was required for FACTS itself; however, prior to the DHS



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OIG inspection, the Coast Guard Assistant Commandant for Intelligence (CG-2) and CGIS began to re-examine the privacy implications of FACTS as a database and have initiated a review, including a PIA to ensure all related privacy protections and requirements are properly addressed. ECD: June 21, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. We urge CGIS to make fulfillment of this recommendation a top priority due to the sensitive nature of the information stored on FACTS. This recommendation is open and resolved. We will close this recommendation when CGIS provides evidence that a PIA was conducted for FACTS.

**Recommendation #9:** Develop and publish a policy manual for FACTS to standardize, at a minimum, what fields must be completed and the type of information needed in each field.

CGIS Response: Concur. CGIS has developed and published a FACTS User Manual which is now available to all FACTS users via a SharePoint website. CGIS continues to update and adjust the FACTS manual as changes to the system are implemented. The Coast Guard requests closure of this recommendation as the policy manual for FACTS was officially released on October 6, 2016.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is closed and resolved.

**Recommendation #10:** Provide training to FACTS users on navigating the system and policy requirements.

CGIS Response: Concur. CGIS conducted extensive training during the roll-out of the FACTS system in 2014 and continues to conduct regular refresher training. The FACTS system was implemented by CGIS field agents (the Core Team); they designed and implemented the requirements. Prior to the system going live, CGIS held train-the-trainer sessions with 10-15 agents per class on 12-16 May 2014, 19-23 May 2014, 27-30 May 2014, 2 June 2014, and 9 June 2014. Select agents from each region attended this course and then served as embedded trainers to visit/train reserve members as well as the various field officers within their regions. In addition, in October 2014, CGIS commenced in-service training for agents on a recurring basis. The in-service training program, which reaches one quarter of the total CGIS work force each year, includes a FACTS training element. ECD: October 31, 2017.

OIG Analysis: CGIS' response does not meet the intent of this recommendation. This recommendation stems from direct observations and conversations with FACTS users, and CGIS should consider conducting a skills assessment and then tailoring training accordingly. This recommendation is open and



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unresolved. The recommendation will remain open until CGIS confirms that it has provided sufficient FACTS related training to all FACTS users.

**Recommendation #11:** Determine the appropriate amount of time for the maintenance of LEAP records and clarify contradictory policy regarding the same.

CGIS Response: Concur. CGIS policy, as directed in the Investigations Manual, COMDTINST M5527.1B, states that it is the responsibility of the Regional SACs to maintain accurate records of LEAP hours worked by civilian agents. Regional SACs are to maintain the LEAP Worksheet and Certification forms for three years, after which they may be destroyed. Deputy Director, CGIS shall maintain the LEAP Worksheet and Certification forms for civilian special agents assigned to CGIS Headquarters for the same time period. On 04 June 2014 CGIS issued a clarification of the LEAP records documentation policy via Director's Note 2014-5. The Director will further clarify the three year retention policy via a 2017 Director's Note. ECD: April 1, 2017.

OIG Analysis: CGIS' response partially meets the intent of this recommendation; further clarification and instruction should be made to the Regional SACs regarding the records retention period for LEAP data. This recommendation is open and unresolved. The recommendation will remain open until CGIS provides evidence that they have issued a policy clarification and can demonstrate that CGIS management is maintaining LEAP data and certifications for all LEAP-eligible employees. In addition, we advise CGIS to update their estimated completion date for this recommendation, as it has not been fully implemented.

**Recommendation #12:** Ensure that LEAP eligible employees maintain an annual average of unscheduled duty hours equal to or greater than 2 hours per regular work day. We further recommend that the CGIS Director ensure LEAP eligible employees certify initially and on an annual basis that they have met and will continue to meet the minimum LEAP requirements per title 5 USC § 5545a(d).

CGIS Response: Concur. CGIS LEAP-eligible employees maintain an annual average of unscheduled duty hours equal to or greater than two hours per regular work day. LEAP eligible employees certify initially and on an annual basis that they have met and will continue to meet the minimum LEAP requirements per Title 5 USC§ 5545a(d). On 04 June 2014, CGIS issued Director's Note 2014-5 clarifying that all civilian agents who are eligible to receive Law Enforcement Availability Pay (LEAP) are required to utilize the following documents for the administration of LEAP:

- 1) Initial Certification of Availability Pay, CGIS-7230-a
- 2) Availability Pay Bi-Weekly Time Sheet, CGIS-7230b
- 3) Annual Certification, CGIS-7230c



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The Director will clarify the minimum two hours per regular workday requirement via a 2017 Director's Note. ECD: April 1, 2017.

OIG Analysis: CGIS' response generally meets the intent of this recommendation. However, in addition to clarifying the minimum two hours per regular workday requirement, the Director should also remind all applicable staff of their obligation to submit the required certifications. Throughout the course of our review, neither CGIS management nor field office management were able to provide documentation ensuring all LEAP-eligible employees were complying with all LEAP requirements. This recommendation is open and unresolved. The recommendation will remain open until CGIS provides evidence that they have issued a policy clarification.

**Recommendation #13:** Develop a structured training program to include:

- oversight to ensure appropriate compliance with all training requirements;
- policies and procedures to ensure all law enforcement personnel periodically qualify on all issued firearms and all weapons (shotguns, rifles) accessible through their posts of duty;
- policies and procedures regarding the proper documentation of all training to ensure compliance with basic, post-basic, recurring, and periodic training requirements; and
- policies and procedures regarding periodic training requirements for use of force, and essential law enforcement areas, such as legal updates, arrest techniques, defensive tactics, flying while armed, and intermediate weapons.

CGIS Response: Concur. CGIS concurs with the need for a well-structured, comprehensive training program for all CGIS law enforcement personnel. CGIS staff is currently drafting policy and procedures compliant with the Coast Guard Directives Systems Manual, COMDTINST M5215.6H, which are designed to address:

- Define roles and responsibilities for CGIS required training and training records management.
- Standardize and require the use of the Training Management Tool (TMT) for recording completion of all training.
- Establish a standardized and centrally managed training program.
- Establish standards for periodic inspection and evaluation of CGIS regional training program execution.
- Ensure all required training is accomplished and recorded.



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On 18 October 2016, CGIS Assistant Director for Training submitted a request for creation of a Special Agent competency in TMT. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they have created a structured training program.

**Recommendation #14:** Ensure that all firearm inventories are updated as changes occur, and the appropriate firearms custodian secures all unassigned weapons.

CGIS Response: Concur. CGIS is in the process of conducting the Annual Firearms Inventory required by Coast Guard regulations. This procedure ensures up to date inventories are recorded and verified. Additionally, per the Ordnance Manual, COMDTINST M8000.2E, local firearm custodians are required to conduct regular maintenance of local firearms inventories, to be verified via the Annual Firearms Inventory. All CGIS weapons (e.g., shotguns, rifles) that are unassigned are secured in appropriate controlled access containers. ECD: April 1, 2017.

OIG Analysis: CGIS' response partially meets the intent of this recommendation. As stated in the report, we found instances of firearms inventories that had not been updated as changes occurred. Thus, we recommend CGIS implement additional guidance, outside the annual firearms inventory verifications, to ensure firearms inventories are updated as needed. This recommendation is open and unresolved. The recommendation will remain open until CGIS provides evidence that they have conducted the annual firearms inventory, reconciled any discrepancies, and communicated a policy for updating firearms inventories on an as needed basis.

**Recommendation #15:** Evaluate the practice of assigning two handguns to every agent. We further recommend that if the CGIS Director continues to assign two handguns per agent, he implement policies to ensure that agents only carry weapons with which they have qualified.

CGIS Response: Concur. Prior to the onset of the inspection, CGIS chartered a working group to evaluate the practice of assigning two handguns to every agent and is in the process of identifying a single standard duty firearm. The working group is scheduled to report recommended Courses of Action (COA) to the Director by 31 March 2017. Until that process is complete, CGIS policy requires that agents only carry the weapons with which they have qualified. ECD: March 31, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open



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until CGIS provides evidence that they have evaluated the practice of assigning two handguns to every agent.

**Recommendation #16:** Ensure that agents have enough ammunition to comply with quarterly firearms training requirements, and to rotate ammunition carried in their duty weapons on at least a bi-annual basis.

CGIS Response: Concur. Unlike other DHS components, CGIS is not authorized to directly purchase ammunition. CGIS agents are issued sufficient ammunition (over 54,000 rounds in FY2017, approximately 140 rounds per agent per year) to comply with quarterly firearms training requirements. As a component of the Coast Guard, CGIS complies with ordnance inventory requirements imposed by the Department of Defense, known as the Non-Combat Expenditure Allowance (NCEA) for ammunition. Each CGIS agent is allocated .40 caliber ball ammunition in order to maintain firearms qualifications and sufficient duty ammunition (.40 caliber, jacketed hollow point (JHP)) in order to rotate ammunition carried in their duty weapons on an annual basis. Duty ammunition is expended on a "first in/first out" basis as required to maintain weapon functionality and officer safety. Request closure as implemented.

OIG Analysis: CGIS' contention that they have sufficient ammunition to comply with quarterly firearms training requirements and rotate ammunition carried by investigators is contrary to what was reported to us by firearms instructors. Additionally, the calculations provided by CGIS in their response appear to show that CGIS has 386 employees who are assigned weapons (54,000/140), although records provided to us during the review suggest that 386 is the total number of all CGIS employees. At a minimum, to calculate the ammunition needed, CGIS should multiply the number of weapons assigned by the amount of bullets needed to satisfy quarterly training requirements. We recommend CGIS research the issue further and make adjustments as needed. This recommendation is open and unresolved. The recommendation will remain open until CGIS provides evidence that they have evaluated this issue further.

**Recommendation #17:** Ensure field offices maintain an organized and updated property inventory system that would support a timeline for updating inventory records once items have been transferred or removed from an office.

CGIS Response: Concur. In accordance with Coast Guard regulations, CGIS units are required to conduct annual inventories of all Coast Guard issued property and must account for any lost, transferred, or surveyed property and equipment. CGIS plans to implement routine, periodic inspections where SACs will review property inventories and equipment assigned within their respective Regional offices against maintained property lists. These inspections will augment the currently conducted annual inventories. Additionally, the CGIS Deputy for Mission Support will conduct random reviews of property,



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evidence, and confidential informant records via on-site visits beginning Summer 2017. ECD: December 31, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they implemented the process described in their response.

**Recommendation #18:** Require all equipment not assigned to individuals be stored in a locked area with limited access.

CGIS Response: Concur. CGIS equipment that is not assigned to an accountable individual will be stored in locked areas with limited access.

OIG Analysis: CGIS fully implemented this recommendation prior to our receipt of management comments to the report. Their actions meet the intent of our recommendation, and therefore, the recommendation is closed and resolved.

**Recommendation #19:** Research banking options for the confidential fund account that incur fewer fees.

CGIS Response: Concur. CGIS concurs with the recommendation's intent to use banking services that incur fewer fees; however, CGIS is not authorized to enter into a separate banking agreement because DHS recently entered into an interagency agreement directing the use of MetaBank for debit cards starting in June 2017. Request closure of this recommendation.

OIG Analysis: We will evaluate the noted interagency agreement and make a determination as to the status of this recommendation at a later date. In the interim, we recommend that CGIS inquire of other law enforcement entities within DHS, to include DHS OIG, as to what banking methods they are using to maintain confidential fund accounts. This recommendation is open and unresolved.

**Recommendation #20:** Ensure all offices have a confidential funds custodian as well as an alternate.

CGIS Response: Concur. CGIS has designated a primary and alternate confidential funds custodian for all regional offices. Request closure as implemented.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they have assigned primary and alternate confidential funds custodians for all regions.

**Recommendation #21:** Ensure all confidential fund transactions are properly documented.



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Response: Concur. CGIS is in the process of hiring a dedicated Confidential Informant Program Manager (GS-1811-13, Secondary Law Enforcement Position). This individual will manage, train, and oversee the financial records and transactions of the CGIS Confidential Informant program. ECD: September 30, 2017.

OIG Analysis: Although hiring a dedicated confidential informant program manager will further the intent of this recommendation, CGIS can take immediate steps to ensure that all confidential fund transactions are documented according to policy. This recommendation is open and unresolved. The recommendation will remain open until CGIS presents a plan to ensure that all confidential fund transactions are properly documented.

**Recommendation #22:** Ensure all paperwork is complete for all confidential informants.

CGIS Response: Concur. CGIS is in the process of hiring a dedicated Confidential Informant Program Manager (GS-1811-13, Secondary Law Enforcement Position). This individual will manage, train, and oversee the CGIS Confidential Informant program in its entirety. ECD: September 30, 2017.

OIG Analysis: Although hiring a dedicated confidential informant program manager will further the intent of this recommendation, CGIS can take immediate steps to ensure that all documentation is complete for all confidential informants. This recommendation is open and unresolved. The recommendation will remain open until CGIS presents a plan to ensure that all required documentation is complete for all confidential informants.

**Recommendation #23:** Ensure that all evidence is inventoried every 6 months as required.

Response: Concur. CGIS will institute policy requiring SACs to inspect and verify their respective region's compliance with evidence inventory requirements and Assistant Directors for Operations will ensure completion every 6 months. ECD: June 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they instituted the noted policy.

**Recommendation #24:** Ensure the Evidence Custody Logs contain the required information.



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CGIS Response: Concur. As part of the resolution to Recommendation #26, the FACTS working group will recommend corrective actions and CGIS will implement updates to FACTS that will ensure complete and standardized Evidence Custody Logs. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they implemented the requisite updates to FACTS.

**Recommendation #25:** Ensure the FACTS system has the necessary fields to input and readily view the required and essential information for evidence.

CGIS Response: Concur. As part of Recommendation #26, the FACTS system upgrade will address this recommendation. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they implemented the requisite updates to FACTS.

**Recommendation #26:** Establish a transition plan before requiring CGIS locations to enter evidence into FACTS and provide employees with clear instructions on how to use the system for logging inventory to ensure consistent and accurate evidence record keeping across CGIS.

CGIS Response: Concur. A FACTS working group was convened in September 2016 to address policies, procedures, and proposed upgrades to FACTS. In addition, the group has been tasked with identifying best practices for processing evidence inventories to include resolution of incomplete data fields. ECD: September 30, 2018.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they implemented the requisite updates to FACTS.

**Recommendation #27:** Ensure evidence, including narcotics, is properly sealed to protect the integrity of the evidence.

CGIS Response: Concur. The discrepancies noted during the OIG review were addressed and corrected on site. In the future, all evidence inventories and policy compliance will be monitored by the Regional Special Agent in Charge during semi-annual Office Inspections. Regional Office policy compliance and evidence inventories will be further evaluated and verified during scheduled CGIS Headquarters site visits. Request closure as implemented.



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OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they have instituted the policy noted in their response to recommendation 23.

**Recommendation #28:** Revise guidance to ensure evidence custodians verify contents of evidence bags and weigh narcotics as part of the periodic inventory of evidence.

CGIS Response: Concur. Additional guidance and clarification of proper custodial techniques and best practices identified during the inspection were shared with the TRADET staff to incorporate into future refresher training. All evidence inventories and policy compliance will be monitored by the Regional Special Agent in Charge during semi-annual Office Inspections. Regional Office policy compliance and evidence inventories will be further evaluated and verified during scheduled CGIS Headquarters site visits. Request closure as implemented.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that they have instituted the policy noted in their response to recommendation 23.

**Recommendation #29:** Ensure that all evidence is secured in structures suitable for the storage of evidence.

CGIS Response: Concur. All CGIS evidence is secured in locked enclosures with controlled access. There is one instance of evidence from an Oily Water Separator/illegal dumping case (e.g., plastic tubing and rubber hoses) that is stowed in a locked storage trailer due to the fact that the evidence is contaminated with volatile petroleum remnants. The items in this secured trailer relate to a case that has already been successfully prosecuted, and CGIS has sought to dispose of the property but has been directed by the USAO's office to maintain the property should the defendant violate the terms of his probation. This locked trailer is co-located with other CG storage trailers and containers guarded within the Coast Guard Yard, Baltimore, MD. Request closure as implemented.

OIG Analysis: During our review, we found three offices that stored evidence in off-site locations. Two of the three locations were movable trailers that were not suitable for the storage of evidence. The fact that the USAO's office directed CGIS to maintain the property reemphasizes the importance of storing it in a suitable manner. Also, the trailers being co-located with other CG trailers that are within the perimeter of a CG installation does not mitigate the fact that they are movable containers and accessible to others. We recommend that CGIS find a secure location to store evidence. This recommendation is open and unresolved.



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**Recommendation #30:** Evaluate the policy on when investigations are deemed to be closed to ensure that all investigative activity is completed prior to closing the investigation.

CGIS Response: Concur. CGIS has reviewed the applicable FACTS policy, which makes a distinction between "Closed" and "Closed- Referred." A "Closed" case is the final closure with all CGIS investigative actions complete, while a "closed-referred" indicates that CGIS has completed all investigative actions and referred the case to the affected command. This allows CGIS to accurately account for the investigative time committed to each investigation, while not counting time during which a referred case is reviewed by either Legal or the individual Command. Request closure as implemented.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is closed and resolved.

**Recommendation #31:** Ensure that the proper rights advisements are given in every applicable instance and that such actions are documented in FACTS.

CGIS Response: Concur. CGIS policy directs that proper rights advisements be given and entered into FACTS. As part of the future FACTS upgrade, a separate data field will be included to specifically "flag" this requirement in the investigative record. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that the intended future FACTS upgrade was implemented.

**Recommendation #32:** We recommend the CGIS Director ensure that comprehensive reports that comply with CIGIE guidelines are produced for each investigation.

CGIS Response: Concur. The development of additional reporting capabilities and "one button" printing functionality in FACTS is ongoing and will fully address this recommendation when complete. ECD: September 30, 2017.

OIG Analysis: CGIS' response meets the intent of this recommendation. This recommendation is open and resolved. The recommendation will remain open until CGIS provides evidence that the noted enhancements to FACTS were made and provide details on what the comprehensive reports will include.



## **Appendix A**

### **Objective, Scope, and Methodology**

The DHS OIG Office of Integrity and Quality Oversight, Investigations and Program Integrity Division, in keeping with the oversight responsibilities mandated by the *Inspector General Act of 1978*, as amended, examined CGIS operations to assess overall compliance with relevant DHS and USCG policies. The OIG last reviewed CGIS in February 2010 and published a report of their findings. We conducted our most recent review from April 2016 through November 2016. We conducted the onsite portions of our review in the months of June, July, and August 2016. We visited CGIS Headquarters in Washington, DC as well as the Baltimore RAC Office, Washington Field Office, Portsmouth Field Office, and Seattle Field Office. The review covered activity from October 1, 2013 through March 31, 2016 (fiscal year 2014 through the end of the second quarter of fiscal year 2016).

Prior to the site visits, the inspection team sent a pre-inspection survey to the CGIS Director asking for background information and any additional information that he wanted to share with the inspection team. The pre-inspection survey is designed to help the inspection team understand the types of investigations initiated, how CGIS handles classified information, the complexity of operations, and collateral duty assignments. The survey also allowed the Director to identify any known deficiencies with the office and request a review of particular areas. Additionally, prior to the site visits, we requested policies governing CGIS operations, an explanation of the complaint intake process, the number of employees assigned, and operational statistics.

During our review period, CGIS closed 2,135 cases. This figure includes administrative investigations, criminal investigations, intelligence operations, OIG investigations, other agency support, and task force operations. The CGIS employee responsible for providing this data informed the inspection team that the list of closed cases should not have included cases categorized as “intelligence operations” because they are not investigations. Therefore, intelligence operations were removed from our list, leaving a total population of 2,041 cases. CGIS was not able to accurately determine how many criminal investigations were included in the total population. Our sample therefore was bound to include cases that did not meet our scope.

In determining our sample size, we referenced the CIGIE standards for random sampling. These standards state that for a random sample where the universe is over 500 cases, the sample size should be 50 cases. CGIS provided the inspection team with data spanning 3 fiscal years, which, on average, amounted to over 500 cases per year. We decided to exceed the sample size recommended by CIGIE and review a random sample of 150 cases (50 cases per year).



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However, after working through the FACTS system for several days, it became clear that reviewing 150 cases would not be possible or beneficial given our limited time and resources. We chose to decrease our sample to 72 cases. For the purpose of our review, we were only interested in criminal investigations, and not all case types included in the original population. However, not all cases were properly marked with the case type, and it was unclear, even after reading the details of some cases, whether the case was properly categorized. Therefore, the quantifiable information we were able to ascertain does not apply to all cases reviewed. We determined that, of the 72 cases in our sample, only 60 cases were criminal in nature.

During our site visits, we reviewed several administrative areas using checklists based on CGIS policies and CIGIE standards. The full list of areas reviewed is in appendix C.

In an effort to conduct our workforce assessment, we reviewed and analyzed four different tools. We conducted in-person workforce assessment interviews, administered an electronic survey to all CGIS personnel nationwide, and reviewed and analyzed the results of the 2014 Defense Equal Opportunity Management Institute survey and the Federal Employee Viewpoint Survey results from 2013, 2014, and 2015.

We met with employees at CGIS Headquarters and four field office locations and conducted workforce assessment interviews with all available employees. Our interviews gave employees the opportunity to discuss morale, best practices, availability of training, equipment, and any other concerns they wished to bring to the OIG's attention. In addition, we also administered an electronic survey to all 386 employees at CGIS' 47 offices, asking similar questions to the in-person interviewees in an effort to reach as many employees as possible. There were 126 respondents to the electronic survey, 46 of which provided written responses. We used the OMB MAX survey capability in order to make all survey responses anonymous. The survey included 17 questions with answer options ranging from strongly disagree to strongly agree and one free-form comment box at the end for employees to elaborate on any issues.

In 2014, CGIS employees were provided the opportunity to participate in the DEOMI Organizational Climate Survey. One hundred and ninety five CGIS employees completed the survey, which accounted for roughly half of the CGIS workforce at that time.

OMB conducts the FEVS each year to identify key strengths and current challenges facing government agencies. OMB sends the surveys to a random sampling of federal employees across the executive branch to measure employee engagement and satisfaction. The inspection team reviewed the FEVS results for CGIS for the reporting years of 2014-2016. CGIS averaged approximately 32 respondents annually over that period. The survey is over 80



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total questions designed to gauge employee perceptions of their work experience with the agency.



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**Appendix B**  
**CGIS Response to the Draft Report**



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APR - 3 2017

**MEMORANDUM**

From: *A. J. Tiptonson*  
A. J. Tiptonson  
COMDT (CG-8)

Reply to: Audit Manager  
Attn of: Megan Owens  
(202) 372-3533

To: John E. McCoy II  
Assistant Inspector General  
Office of Integrity and Quality Oversight

Subj: DHS OIG DRAFT REPORT: OVERSIGHT REVIEW OF THE DEPARTMENT OF  
HOMELAND SECURITY UNITED STATES COAST GUARD INVESTIGATIVE  
SERVICE

Ref: (a) OIG Project No. OIG-17-\*\*-IQO of February 10, 2017

1. This memorandum transmits the Coast Guard's response to the draft report identified in reference (a).
2. The Coast Guard concurs with all of the recommendations listed in the draft report. Our response in enclosure (1) demonstrates that the Coast Guard Investigative Service is taking action to correct the deficiencies noted in the recommendations. Based on actions already taken, we request closure on recommendations 9, 16, 19, 20, 27, 28, 29, and 30 as outlined in our response.
3. If you have any questions, my point of contact is Ms. Megan Owens who can be reached at 202-372-3533.

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Enclosure: (1) USCG Response to OIG Draft Report on CGIS



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**OVERSIGHT REVIEW OF THE DEPARTMENT OF HOMELAND SECURITY  
UNITED STATES COAST GUARD INVESTIGATIVE SERVICE  
OIG Project No. OIG-17-\*\*-IQO**

**OIG Recommendation #1:** Issue policy to standardize and centralize the receipt and referral of allegations and ensure FACTS includes a field to capture when an allegation was referred to the OIG.

**Response:** Concur. CGIS is reviewing our policies and allegation receipt processes to ensure that FACTS includes a field to indicate when an allegation has been referred to the OIG. The current business intelligence system built into the CGIS Records Management System (RMS) does provide ability to locate cases that either originated from the OIG (e.g., came into the OIG hotline and were referred to CGIS by the OIG) or originated within the USCG but require notification to the OIG because of their nature. We concur that the creation of a specific searchable field in the RMS would enhance the search function for these cases and CGIS will work to incorporate that function in the FACTS upgrade. Estimated Completion Date (ECD): September 30, 2017.

**OIG Recommendation #2:** Articulate in policy what constitutes an OIG-referable allegation, train all necessary staff accordingly, and ensure that CGIS refers the requisite allegation to the OIG.

**Response:** Concur. While CGIS works to closely follow the terms of the Memorandum of Understanding (MOU) with OIG, CGIS agrees to develop an appropriate policy statement implementing the guidance provided in the MOU and will conduct appropriate training on that policy. ECD: June 1, 2017.

**OIG Recommendation #3:** Provide a quarterly report to the OIG describing the status of all open Hotline Complaint investigations as mandated by the MOU.

**Response:** Concur. CGIS concurs that a quarterly report would improve the communications between CGIS and OIG regarding the status of Hotline Complaint investigations and will develop such a report. ECD: June 30, 2017.

**OIG Recommendation #4:** Follow the requirements to administer the DEOCS on an annual basis. We further recommend the CGIS Director develop and implement a corrective action plan to address concerns learned through the DEOCS.

**Response:** Concur. The CGIS Deputy Director of Mission Support has specifically requested a DEOCS survey and will encourage employee participation from our active duty, reserve, and civilian workforce. CGIS will develop and execute a corrective action plan as necessary based on the survey results. ECD: September 30, 2017.

**OIG Recommendation #5:** Conduct an analysis to determine whether CGIS agents are compensated consistent with their peers within DHS and make changes as necessary.

**Response:** Concur. Prior to the OIG inspection, CGIS requested an analysis to identify skill gaps, analyze compensation, and build staffing models to address this recommendation. CGIS is actively engaged with the Coast Guard Assistant Commandant for Human Resources (CG-1) to finalize this analysis and will implement corrective actions as necessary pending the results. ECD: October 31, 2017.

**OIG Recommendation #6:** Consult with the Coast Guard Directives and Publications Division, CG-612, to ascertain the most appropriate format to memorialize policy and replace the existing Coast

Enclosure (1)



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Guard Investigations Manual with a document that complies with Systems Manual requirements.

**Response:** Concur. CGIS has assigned a senior special agent (GS-14) as the Assistant Director for Policy (ADP) to update the Investigations Manual. Since 2015, the ADP has periodically issued operating procedures which supersede various provisions of the Investigations Manual. This system of periodic updates, whether by Director's Note, Criminal Investigation Operating Procedure, or Mission Support Operating Procedure, is fully consistent with the Coast Guard's Directives and Publication System. To improve CGIS's awareness of the updates, the ADP intends to submit a Commandant's Change Notice informing subordinate CGIS commands of all changes that have occurred since 2015. Additionally, CGIS intends to coordinate with CG-612 and Force Command (FORCECOM) to issue a revised Commandant Instruction Manual on Investigations and promulgate operating procedures as techniques, tactics, and procedures (TTP) in accordance with FORCECOM guidance. ECD: September 30, 2018.

**OIG Recommendation #7:** Continue to update investigative policy and follow the Coast Guard clearance process outlined in M5215.6 prior to issuing new policy.

**Response:** Concur. As noted during the inspection, the CGIS Investigations Manual was last updated in 2001 and requires modernization. From 2001 until 2013 the manual was revised via "Director's Notes". Starting in 2014, CGIS committed significant resources to updating the manual and created a full-time Assistant Director for Policy (ADP) in 2015. The ADP is in the process of submitting a Commandant's Change Notice informing subordinate CGIS offices of all changes, Standard Operating Procedures (SOP) and Director's Notices (DN) that are in effect. The ADP also updates policies and SOPs in a deliberative and ongoing process in coordination with CG-612, Force Command (FORCECOM), and the CGIS embedded legal counsel.

The ADP will issue a revised Investigations Manual and continue to promulgate operating procedures as techniques, tactics, and procedures (TTP) in accordance with FORCECOM guidance. ECD: September 30, 2018.

**OIG Recommendation #8:** Ensure that a Privacy Impact Assessment is conducted for FACTS and that all related requirements are properly addressed.

**Response:** Concur. Prior to the implementation of FACTS, a Privacy Impact Assessment (PIA) was conducted for MagNET, the information technology system that FACTS resides on. At that time it was not realized that an additional PIA was required for FACTS itself; however, prior to the DHS OIG inspection, the Coast Guard Assistant Commandant for Intelligence (CG-2) and CGIS began to re-examine the privacy implications of FACTS as a database and have initiated a review, including a PIA to ensure all related privacy protections and requirements are properly addressed. ECD: June 21, 2017.

**OIG Recommendation #9:** Develop and publish a policy manual for FACTS to standardize, at a minimum, what fields must be completed and the type of information needed in each field.

**Response:** Concur. CGIS has developed and published a FACTS User Manual which is now available to all FACTS users via a SharePoint website. CGIS continues to update and adjust the FACTS manual as changes to the system are implemented. The Coast Guard requests closure of this recommendation as the policy manual for FACTS was officially released on October 6, 2016.

**OIG Recommendation #10:** Provide training to FACTS users on navigating the system and policy requirements.

Enclosure (1)



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**Response:** Concur. CGIS conducted extensive training during the roll-out of the FACTS system in 2014 and continues to conduct regular refresher training. The FACTS system was implemented by CGIS field agents (the Core Team); they designed and implemented the requirements. Prior to the system going live, CGIS held train-the-trainer sessions with 10-15 agents per class on 12-16 May 2014, 19-23 May 2014, 27-30 May 2014, 2 June 2014, and 9 June 2014. Select agents from each region attended this course and then served as embedded trainers to visit/train reserve members as well as the various field officers within their regions. In addition, in October 2014, CGIS commenced in-service training for agents on a recurring basis. The in-service training program, which reaches one quarter of the total CGIS work force each year, includes a FACTS training element. ECD: October 31, 2017.

**OIG Recommendation #11:** Determine the appropriate amount of time for the maintenance of LEAP records and clarify contradictory policy regarding the same.

**Response:** Concur. CGIS policy, as directed in the Investigations Manual, COMDTINST M5527.1B, states that it is the responsibility of the Regional SACs to maintain accurate records of LEAP hours worked by civilian agents. Regional SACs are to maintain the LEAP Worksheet and Certification forms for three years, after which they may be destroyed. Deputy Director, CGIS shall maintain the LEAP Worksheet and Certification forms for civilian special agents assigned to CGIS Headquarters for the same time period. On 04 June 2014 CGIS issued a clarification of the LEAP records documentation policy via Director's Note 2014-5. The Director will further clarify the three year retention policy via a 2017 Director's Note. ECD: April 1, 2017.

**OIG Recommendation #12:** Ensure that LEAP eligible employees maintain an annual average of unscheduled duty hours equal to or greater than 2 hours per regular work day. We further recommend that the CGIS Director ensure LEAP eligible employees certify initially and on an annual basis that they have met and will continue to meet the minimum LEAP requirements per title 5 USC § 5545a(d).

**Response:** Concur. CGIS LEAP-eligible employees maintain an annual average of unscheduled duty hours equal to or greater than two hours per regular work day. LEAP eligible employees certify initially and on an annual basis that they have met and will continue to meet the minimum LEAP requirements per Title 5 USC § 5545a(d). On 04 June 2014, CGIS issued Director's Note 2014-5 clarifying that all civilian agents who are eligible to receive Law Enforcement Availability Pay (LEAP) are required to utilize the following documents for the administration of LEAP:

- 1) Initial Certification of Availability Pay, CGIS-7230-a
- 2) Availability Pay Bi-Weekly Time Sheet, CGIS-7230b
- 3) Annual Certification, CGIS-7230c

The Director will clarify the minimum two hours per regular workday requirement via a 2017 Director's Note. ECD: April 1, 2017.

**OIG Recommendation #13:** Develop a structured training program to include:

- Oversight to ensure appropriate compliance with all training requirements;
- Policies and procedure to ensure all law enforcement personnel periodically qualify on all issued firearms and all weapons (shotguns, rifles) accessible through their posts of duty;
- Policies and procedures regarding the proper documentation of all training to ensure compliance with basic, post-basic, recurring, and periodic training requirements; and
- Policies and procedures regarding periodic training requirements for use of

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force, and essential law enforcement areas, such as legal updates, arrest techniques, defensive tactics, flying while armed, and intermediate weapons.

**Response:** Concur. CGIS concurs with the need for a well-structured, comprehensive training program for all CGIS law enforcement personnel. CGIS staff is currently drafting policy and procedures compliant with the Coast Guard Directives Systems Manual, COMDTINST M5215.6H, which are designed to address:

- Define roles and responsibilities for CGIS required training and training records management.
- Standardize and require the use of the Training Management Tool (TMT) for recording completion of all training.
- Establish a standardized and centrally managed training program.
- Establish standards for periodic inspection and evaluation of CGIS regional training program execution.
- Ensure all required training is accomplished and recorded.

On 18 October 2016, CGIS Assistant Director for Training submitted a request for creation of a Special Agent competency in TMT. ECD: September 30, 2017.

**OIG Recommendation #14:** Ensure that all firearm inventories are updated as changes occur, and the appropriate firearms custodian secures all unassigned weapons.

**Response:** Concur. CGIS is in the process of conducting the Annual Firearms Inventory required by Coast Guard regulations. This procedure ensures up to date inventories are recorded and verified. Additionally, per the Ordnance Manual, COMDTINST M8000.2E, local firearm custodians are required to conduct regular maintenance of local firearms inventories, to be verified via the Annual Firearms Inventory. All CGIS weapons (e.g., shotguns, rifles) that are unassigned are secured in appropriate controlled access containers. ECD: April 1, 2017.

**OIG Recommendation #15:** Evaluate the practice of assigning two handguns to every agent. We further recommend that if the CGIS Director continues to assign two handguns per agent, he implement policies to ensure that agents only carry weapons with which they have qualified.

**Response:** Concur. Prior to the onset of the inspection, CGIS chartered a working group to evaluate the practice of assigning two handguns to every agent and is in the process of identifying a single standard duty firearm. The working group is scheduled to report recommended Courses of Action (COA) to the Director by 31 March 2017. Until that process is complete, CGIS policy requires that agents only carry the weapons with which they have qualified. ECD: March 31, 2017.

**OIG Recommendation #16:** Ensure that agents have enough ammunition to comply with quarterly firearms training requirements, and to rotate ammunition carried in their duty weapons on at least a bi-annual basis.

**Response:** Concur. Unlike other DHS components, CGIS is not authorized to directly purchase ammunition. CGIS agents are issued sufficient ammunition (over 54,000 rounds in FY2017, approximately 140 rounds per agent per year) to comply with quarterly firearms training requirements. As a component of the Coast Guard, CGIS complies with ordnance inventory requirements imposed by the Department of Defense, known as the Non-Combat Expenditure Allowance (NCEA) for ammunition. Each CGIS agent is allocated .40 caliber ball ammunition in order to maintain firearms qualifications and sufficient duty ammunition (.40 caliber, jacketed hollow

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point (JHP)) in order to rotate ammunition carried in their duty weapons on an annual basis. Duty ammunition is expended on a "first in/first out" basis as required to maintain weapon functionality and officer safety. Request closure as implemented.

**OIG Recommendation #17:** Ensure field offices maintain an organized and updated property inventory system that would support a timeline for updating inventory records once items have been transferred or removed from an office.

**Response:** Concur. In accordance with Coast Guard regulations, CGIS units are required to conduct annual inventories of all Coast Guard issued property and must account for any lost, transferred, or surveyed property and equipment. CGIS plans to implement routine, periodic inspections where SACs will review property inventories and equipment assigned within their respective Regional offices against maintained property lists. These inspections will augment the currently conducted annual inventories. Additionally, the CGIS Deputy for Mission Support will conduct random reviews of property, evidence, and confidential informant records via on-site visits beginning Summer 2017. ECD: December 31, 2017.

**OIG Recommendation #18:** Require all equipment not assigned to individuals be stored in a locked area with limited access.

**Response:** Concur. CGIS equipment that is not assigned to an accountable individual will be stored in locked areas with limited access. ECD: March 30, 2017.

**OIG Recommendation #19:** Research banking options for the confidential fund account that incur fewer fees.

**Response:** Concur. CGIS concurs with the recommendation's intent to use banking services that incur fewer fees; however, CGIS is not authorized to enter into a separate banking agreement because DHS recently entered into an interagency agreement directing the use of MetaBank for debit cards starting in June 2017. Request closure of this recommendation.

**OIG Recommendation #20:** Ensure all offices have a confidential funds custodian as well as an alternate.

**Response:** Concur. CGIS has designated a primary and alternate confidential funds custodian for all regional offices. Request closure as implemented.

**OIG Recommendation #21:** Ensure all confidential fund transactions are properly documented.

**Response:** Concur. CGIS is in the process of hiring a dedicated Confidential Informant Program Manager (GS-1811-13, Secondary Law Enforcement Position). This individual will manage, train, and oversee the financial records and transactions of the CGIS Confidential Informant program. ECD: September 30, 2017.

**OIG Recommendation #22:** Ensure all paperwork is complete for all confidential informants.

**Response:** Concur. CGIS is in the process of hiring a dedicated Confidential Informant Program Manager (GS-1811-13, Secondary Law Enforcement Position). This individual will manage, train, and oversee the CGIS Confidential Informant program in its entirety. ECD: September 30, 2017.

**OIG Recommendation #23:** Ensure that all evidence is inventoried every 6 months as required.

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**Response:** Concur. CGIS will institute policy requiring SACs to inspect and verify their respective region's compliance with evidence inventory requirements and Assistant Directors for Operations will ensure completion every 6 months. ECD: June 30, 2017.

**OIG Recommendation #24:** Ensure the Evidence Custody Logs contain the required information.

**Response:** Concur. As part of the resolution to Recommendation #26, the FACTS working group will recommend corrective actions and CGIS will implement updates to FACTS that will ensure complete and standardized Evidence Custody Logs. ECD: September 30, 2017.

**OIG Recommendation #25:** Ensure the FACTS system has the necessary fields to input and readily view the required and essential information for evidence.

**Response:** Concur. As part of Recommendation #26, the FACTS system upgrade will address this recommendation. ECD: September 30, 2017.

**OIG Recommendation #26:** Establish a transition plan before requiring CGIS locations to enter evidence into FACTS and provide employees with clear instructions on how to use the system for logging inventory to ensure consistent and accurate evidence record keeping across CGIS.

**Response:** Concur. A FACTS working group was convened in September 2016 to address policies, procedures, and proposed upgrades to FACTS. In addition, the group has been tasked with identifying best practices for processing evidence inventories to include resolution of incomplete data fields. ECD: September 30, 2018.

**OIG Recommendation #27:** Ensure evidence, including narcotics, is properly sealed to protect the integrity of the evidence.

**Response:** Concur. The discrepancies noted during the OIG review were addressed and corrected on site. In the future all evidence inventories and policy compliance will be monitored by the Regional Special Agent in Charge during semi-annual Office Inspections. Regional Office policy compliance and evidence inventories will be further evaluated and verified during scheduled CGIS Headquarters site visits. Request closure as implemented.

**OIG Recommendation #28:** Revise guidance to ensure evidence custodians verify contents of evidence bags and weigh narcotics as part of the periodic inventory of evidence.

**Response:** Concur. Additional guidance and clarification of proper custodial techniques and best practices identified during the inspection were shared with the TRADET staff to incorporate into future refresher training. All evidence inventories and policy compliance will be monitored by the Regional Special Agent in Charge during semi-annual Office Inspections. Regional Office policy compliance and evidence inventories will be further evaluated and verified during scheduled CGIS Headquarters site visits. Request closure as implemented.

**OIG Recommendation #29:** Ensure that all evidence is secured in structures suitable for the storage of evidence.

**Response:** Concur. All CGIS evidence is secured in locked enclosures with controlled access.

There is one instance of evidence from an Oily Water Separator/illegal dumping case (e.g., plastic

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tubing and rubber hoses) that is stowed in a locked storage trailer due to the fact that the evidence is contaminated with volatile petroleum remnants. The items in this secured trailer relate to a case that has already been successfully prosecuted, and CGIS has sought to dispose of the property but has been directed by the USAO’s office to maintain the property should the defendant violate the terms of his probation. This locked trailer is co-located with other CG storage trailers and containers guarded within the Coast Guard Yard, Baltimore, MD. Request closure as implemented.

**OIG Recommendation #30:** Evaluate the policy on when investigations are deemed to be closed to ensure that all investigative activity is completed prior to closing the investigation.

**Response:** Concur. CGIS has reviewed the applicable FACTS policy, which makes a distinction between “Closed” and “Closed—Referred.” A “Closed” case is the final closure with all CGIS investigative actions complete, while a “closed—referred” indicates that CGIS has completed all investigative actions and referred the case to the affected command. This allows CGIS to accurately account for the investigative time committed to each investigation, while not counting time during which a referred case is reviewed by either Legal or the individual Command. Request closure as implemented.

### 5.1.13 Closing/Reopening a Case

Only SACs/ASACs are authorized to close/reopen cases. When a case is closed, the Investigation Status needs to be updated accordingly.

To update Investigation Status:

1. Search for or otherwise navigate to the Case Management record Main screen.
2. Click the Edit Record hyperlink.

Figure 136: Case Management - Edit Record Hyperlink



3. In the Case Status pane, from the Investigation Status dropdown menu, select an option in keeping with the following guidelines:
  - a. Case Active: Indicates that the investigation is ongoing.
  - b. Closed: Indicates that final adjudication is complete.
  - c. Closed - Referred: Indicates that the investigation has been referred to the Command or US Attorney for prosecution decision.
  - d. Closed - Transferred to OGA: Indicates that all CGIS activity is complete and the investigation has been transferred to any Other Government Agency.
  - e. Closed - Wanted Person: Indicates that completion of all leads coincides with an active warrant for a person whose location is unknown.

**OIG Recommendation #31:** Ensure that the proper rights advisements are given in every applicable instance and that such actions are documented in FACTS.

**Response:** Concur. CGIS policy directs that proper rights advisements be given and entered into FACTS. As part of the future FACTS upgrade, a separate data field will be included to specifically “flag” this requirement in the investigative record. ECD: September 30, 2017.

**OIG Recommendation #32:** We recommend the CGIS Director ensure that comprehensive reports that comply with CIGIE guidelines are produced for each investigation.

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**Response:** Concur. The development of additional reporting capabilities and “one button” printing functionality in FACTS is ongoing and will fully address this recommendation when complete. ECD: September 30, 2017.

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## **Appendix C**

### **Checklists and Questionnaires**

- Case File Review Checklist
- Confidential Funds Review Checklist
- Confidential Informant Checklist
- Electronic Intercept Checklist
- Evidence Review Checklist
- Field Office Operations Survey
- Firearms/Ammunition Checklist
- Property Inventory Checklist
- Undercover Operations Checklist



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**Appendix D**  
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