

# **Border Patrol Needs a Staffing Model to Better Plan for Hiring More Agents**





# **DHS OIG HIGHLIGHTS**

## ***Border Patrol Needs a Staffing Model to Better Plan for Hiring More Agents***

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**February 28, 2019**

### **Why We Did This Audit**

Within U.S. Customs and Border Protection (CBP), Border Patrol agents are responsible for patrolling our international land borders and coastal waters surrounding Florida and Puerto Rico. We conducted this audit to determine to what extent Border Patrol agents meet workload requirements related to investigative and law enforcement activities.

### **What We Recommend**

We made two recommendations to CBP that, when implemented, should help Border Patrol manage its workforce in a more efficient and economical manner.

#### **For Further Information:**

Contact our Office of Public Affairs at (202) 981-6000, or email us at [DHS-OIG.OfficePublicAffairs@oig.dhs.gov](mailto:DHS-OIG.OfficePublicAffairs@oig.dhs.gov)

### **What We Found**

Border Patrol lacks the data and procedures needed to determine whether it is meeting workload requirements related to investigative and law enforcement activities. Although directed to do so by Congress in 2011, neither CBP nor Border Patrol has completed or submitted a satisfactory workforce staffing model as required. This occurred because Border Patrol has not prioritized or assigned adequate resources to develop and implement such a model to guide its hiring and operations. Without a complete workforce staffing model and accurate data, Border Patrol senior managers are unable to definitively determine the operational need or best placement for the 5,000 agents the Department of Homeland Security was directed to hire per a January 2017 Executive Order.

Additionally, Border Patrol officials do not consistently schedule agents' work duties or accurately document actual work hours and duties completed. These deficiencies occurred due to a lack of standard operating procedures, training, and oversight of the information entered into its Border Patrol Enforcement Tracking System. As a result, Border Patrol may not be deploying existing agents in the most efficient and economical manner. In fiscal year 2017, Border Patrol agents received approximately \$55.2 million for 1.3 million hours of work that had no supporting documentation to show agents were working as needed to fulfill mission requirements. Good data is essential for Border Patrol to determine its existing and future operational and workload requirements accurately.

### **CBP Response**

The Department concurred with the two recommendations.



**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

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

February 28, 2019

MEMORANDUM FOR: The Honorable Claire M. Grady  
Senior Official Performing the Duties of the  
Deputy Secretary

FROM: John V. Kelly   
Acting Inspector General

SUBJECT: *Border Patrol Needs a Staffing Model to Better Plan for  
Hiring More Agents*

For your action is our final report, *Border Patrol Needs a Staffing Model to Better Plan for Hiring More Agents*. We incorporated the formal comments from the Department in the final report.

The report contains two recommendations aimed at improving the Border Patrol's Staffing tools. Your office concurred with the two recommendations. Based on information provided in your response to the draft report, we consider the recommendations 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.

Please send your response or closure request to  
[OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@oig.dhs.gov).

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to 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 with any questions, or your staff may contact Sondra McCauley, Assistant Inspector General for Audits, at (202) 981-6000.



# OFFICE OF INSPECTOR GENERAL

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### Abbreviations

|               |  |
|---------------|--|
| Border Patrol | United States Border Patrol                |
| BPAPRA        | Border Patrol Agent Pay Reform Act of 2014 |
| BPETS         | Border Patrol Enforcement Tracking System  |
| CBP           | U.S. Customs and Border Protection         |
| COSS          | CBP Overtime Scheduling System             |
| MRD           | Manpower Requirements Determination        |
| OIG           | Office of Inspector General                |
| OPM           | Office of Personnel Management             |
| RGV           | Rio Grande Valley                          |





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### Background

Law enforcement officer duties primarily include the investigation, apprehension, or detention of individuals suspected or convicted of offenses against the criminal laws of the United States. Typically, those duties are rigorous enough Congress determined that employment opportunities should be limited to young and physically vigorous individuals. Law enforcement officers may be transferred directly to supervisory or administrative positions after performing their primary duties<sup>1</sup> for at least 3 years.<sup>2</sup>

Within U.S. Customs and Border Protection (CBP), United States Border Patrol (Border Patrol) agents are responsible for patrolling nearly 6,000 miles of Mexican and Canadian international land borders, and more than 2,000 miles of coastal waters surrounding the Florida Peninsula and the island of Puerto Rico. Figure 1 shows Border Patrol's sectors of operation.

**Figure 1. U.S. Border Patrol's Sectors of Operation**



Source: CBP

<sup>1</sup> For purposes of retirement, generally if an employee spends an average of at least 50 percent of his or her time performing a duty or group of duties, those duties are primary. 5 Code of Federal Regulations (CFR) § 831.902

<sup>2</sup> *Federal Employees' Retirement System* (5 United States Code (USC) § 8401(17))

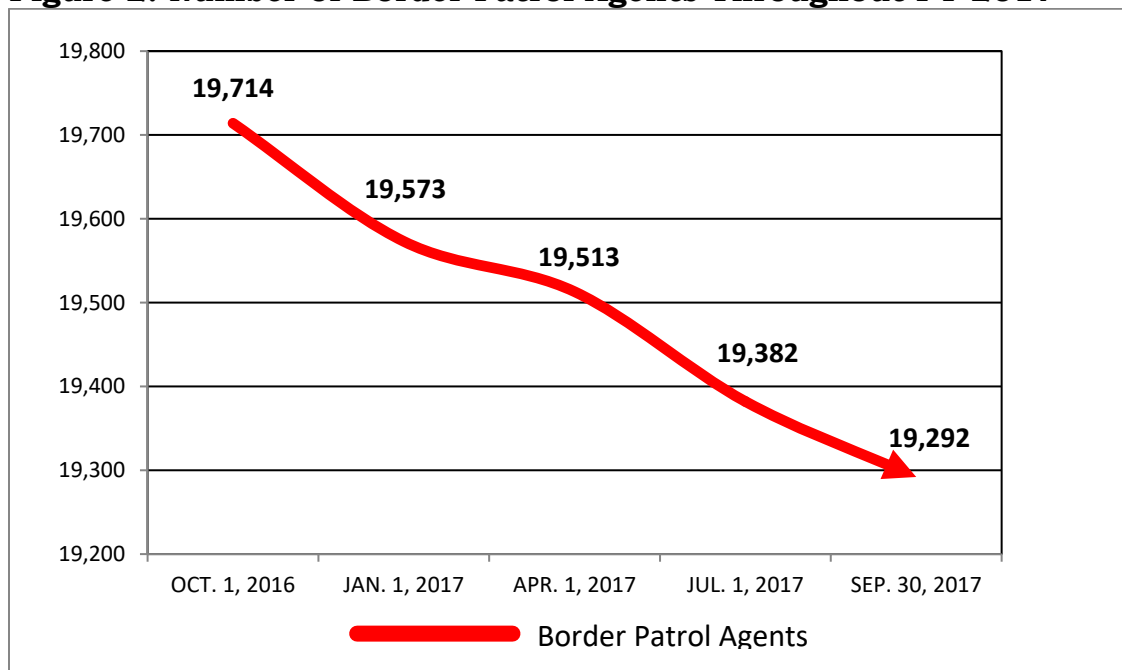


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Although Border Patrol has changed dramatically since its inception in 1924, its primary mission remains unchanged — to detect and prevent the illegal entry of aliens into the United States. Since April 2011, Congress has mandated that Border Patrol achieve an active duty presence of not less than 21,370 agents to secure the U.S. borders between the ports of entry.<sup>3</sup> However, as of FY 2017, attrition exceeded the Border Patrol's ability to hire enough agents to meet this workforce requirement. Figure 2 shows the decline in the number of Border Patrol agents from October 1, 2016, through September 30, 2017.

**Figure 2. Number of Border Patrol Agents Throughout FY 2017**



Source: Department of Homeland Security Office of Inspector General (OIG) analysis of FY 2017 Border Patrol Enforcement Tracking System data

In January 2017, the President issued Executive Order 13767 – *Border Security and Immigration Enforcement Improvements*, directing DHS to hire an additional 5,000 Border Patrol agents to ensure the safety and territorial integrity of the United States as well as to ensure that the Nation's immigration laws are faithfully executed. In February 2017, the Secretary of Homeland Security issued a memorandum for Border Patrol to also hire mission support staff to support an increased number of Border Patrol agents.

<sup>3</sup> *Department of Defense and Full Year Continuing Appropriations Act 2011* (Pub. L. No. 112-10, Section 1608 (April 15, 2011))



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In July 2017, we reported that DHS, CBP, and Border Patrol faced significant challenges identifying, recruiting, hiring, and fielding the number of officers and agents mandated in the Executive Order and the Secretary's memo.<sup>4</sup> In the report, we indicated that neither CBP nor Border Patrol could provide complete data to support the operational need or deployment strategies for the additional 5,000 agents that the administration directed them to hire. CBP officials said they worked for 3 to 4 years, but were still 3 to 4 more years from implementing a process to obtain and analyze accurate operational needs and deployment data. This data included tracking mission-essential functions as well as employee work hours spent conducting these functions.

We conducted this audit to determine to what extent Border Patrol agents meet workload requirements related to investigative and law enforcement activities.

### Results of Audit

Border Patrol lacks the data and procedures needed to determine whether it is meeting workload requirements related to investigative and law enforcement activities. Although directed to do so by Congress in 2011, neither CBP nor Border Patrol has completed or submitted a satisfactory workforce staffing model as required. This occurred because Border Patrol has not prioritized or assigned adequate resources to develop and implement such a model to guide its hiring and operations. Without a complete workforce staffing model and accurate data, Border Patrol senior managers are unable to definitively determine the operational need or best placement for the 5,000 agents DHS was directed to hire per the January 2017 Executive Order.

Additionally, Border Patrol officials do not consistently schedule agents' work duties or accurately document actual work hours and duties completed. These deficiencies occurred due to a lack of standard operating procedures, training, and oversight of the information entered into its Border Patrol Enforcement Tracking System. As a result, Border Patrol may not be deploying existing agents in the most efficient and economical manner. In FY 2017, Border Patrol agents received approximately \$55.2 million for 1.3 million hours of work that had no supporting documentation to show agents were working as needed to fulfill mission requirements. Good data is essential for Border Patrol to determine its existing and future operational and workload requirements accurately.

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<sup>4</sup> *Special Report: Challenges Facing DHS in Its Attempt to Hire 15,000 Border Patrol Agents and Immigration Officers*, OIG-17-98-SR, July 27, 2017



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### **Border Patrol Has Not Completed a Workforce Staffing Model**

Although directed to do so by Congress more than 5 years ago, CBP and Border Patrol have not implemented a workforce staffing model for Border Patrol. Specifically, in 2011, the U.S. House of Representatives Appropriations Committee directed CBP to submit a 5-year staffing and deployment plan for Border Patrol.<sup>5</sup>

After CBP submitted the plan (known as the *Border Patrol Staffing Plan*) in 2013, the Committee stated that the plan failed to address any goals for border security that would shape staffing and resource deployment or note any factors that affect deployment. Therefore, the Committee directed CBP to provide a more complete 5-year staffing and deployment plan, by December 1, 2013, that justified the funded staffing level in detail, including the tasks performed by agents; identified factors related to deployment by sector; and cited criteria and options for redistributing resources to address existing and emerging threats.

However, Border Patrol officials stated they never completed the plan as required. This occurred because Border Patrol did not prioritize or provide adequate resources to develop and implement a workforce staffing model to guide Border Patrol's hiring and operations as required by Congress. Instead, Border Patrol considered Congress' direction and continued developing two other workforce staffing plans already underway. First, Border Patrol's Mission Readiness Operations Directorate was in the process of developing the *Manpower Requirements Determination* (MRD), a methodology to establish a standard organizational structure across the Border Patrol and a foundation to create a workload-based staffing approach. Border Patrol began to identify all job functions occurring within the organization to allow for the development of a process to track the daily work conducted by all employees, not just agents. The process standardized border security tasks referred to as the "Patrol Border Group." Second, in 2016 while MRD development was ongoing, Border Patrol's Strategic Planning and Analysis Directorate also began developing a staffing methodology referred to as the *Personnel Requirements Determination*. This effort was supposed to produce a decision support tool to provide leaders recommendations for staffing based on numerous factors, such as analyzing how many agents are needed at each checkpoint.

By the time we completed our audit work in March 2018, the Border Patrol had not completed the MRD or the *Personnel Requirements Determination*; both offices continued their similar efforts, and neither CBP nor Border Patrol had

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<sup>5</sup> *Department of Homeland Security Appropriations Bill, 2012*, H.R. Rep. 112-91, p. 145 (May 26, 2011). The Report accompanied *Continuing Appropriations Act, 2012* Pub. L. No. 112-33 (September 30, 2011)





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submitted a workforce staffing model as required by Congress. Without a complete workforce staffing model, Border Patrol cannot definitively determine the operational need or best placement for the 5,000 additional Border Patrol agents it was directed to hire in the January 2017 Executive Order.

Lacking a complete workforce staffing model, Border Patrol's approximately 19,300 agents also may not be operating in the most efficient and economical manner. For example, Border Patrol agents are not always conducting primary law enforcement duties. A lack of mission support personnel in U. S. Border Patrol forces Border Patrol agents to conduct support functions. These support functions include clearing brush on roads, moving ground sensors, fixing the border fence, managing station budgets, and serving as full-time vehicle maintenance managers.

Border Patrol officials are aware of this staffing problem and have run an exercise to better understand the impact. For example, in 2017, Border Patrol senior officials in Rio Grande Valley (RGV) Sector conducted a 2-week sector-wide mission readiness exercise, and captured the outcomes in their *Green Pay Period Report*. The exercise focused on moving agents and supervisory agents out of the mission support roles they were filling, and returning them back to their primary border enforcement duties. The effort returned more than 500 agents back to the field to actively patrol the border.

According to Border Patrol, compared to the pay periods immediately before and after the exercise, RGV apprehensions increased by 2.72 percent, and "turnbacks" increased by 7.60 percent.<sup>6</sup> By returning agents to border patrol duties from mission support roles, Border Patrol RGV Sector increased its apprehension and turnback rates. In addition, and more importantly, RGV "gotaways" also increased by 25.23 percent.<sup>7</sup> By returning more agents to the field, the sector actually determined that more people were entering the country illegally than it had previously identified.

Although Border Patrol ran the *Green Pay Period* exercise at one sector, the exercise demonstrated the effect that additional mission support personnel could have on allowing agents already in the Border Patrol to conduct their primary law enforcement duties to interdict aliens and narcotics illegally entering the country.

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<sup>6</sup> "Turnbacks" are individuals attempting to enter the United States illegally who are deterred and returned to Mexico based on Border Patrol agents' presence patrolling the border.

<sup>7</sup> "Gotaways" are individuals observed by Border Patrol agents who illegally entered the United States but were not caught.



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### **Border Patrol Enforcement Tracking System Not Consistently Updated**

According to *OMB Circular A-123, Management's Responsibility for Enterprise Risk Management and Internal Control*, management is responsible for establishing and maintaining internal control to achieve the objectives of effective and efficient operations, reliable financial reporting, and compliance with applicable laws and regulations. However, Border Patrol officials did not consistently schedule agents' work duties, or accurately document work hours and duties completed. Border Patrol uses two separate systems for scheduling agents' work and recording their actual work hours for payroll purposes. Supervisors use the Border Patrol Enforcement Tracking System (BPETS) to make changes and set the schedule for agents' hours in advance of work performed. BPETS has mission-essential function categories for supervisors to assign agents specific duties, down to a 15-minute interval if necessary. (See appendix C for a complete list of duties.) However, once the workday is over, supervisors and agents are not required to, and usually do not, update BPETS with actual work duties completed. To record actual hours for payroll purposes, agents manually input their time into the CBP Overtime Scheduling System (COSS). In contrast to BPETS, COSS does not track the detailed mission-essential function categories; it only accounts for hours worked and leave.

The inaccuracies occurred because Border Patrol lacks standard operating procedures, training, or oversight of the information entered into BPETS for types and hours of work scheduled, and the actual work performed. Border Patrol has basic user guides for BPETS, but has not created a comprehensive manual to show scheduling and tracking requirements or required agents to take training on the system's functions or purpose. Additionally, Border Patrol does not require agents to account in BPETS for actual duties performed after their shifts. According to senior management at one Border Patrol sector, agents should make changes to the system on the hour; however, agents do not do this. Instead, agents leave assignments as they were scheduled in the system initially rather than updating them to reflect actual activities completed and associated hours.

Conducting our analysis, we found large differences between the numbers of hours scheduled in BPETS and the amount of time paid for in COSS. For example, in FY 2017, Border Patrol paid approximately \$55.2 million for 1.3 million hours of work listed in COSS that had no corresponding scheduled hours in BPETS to support the costs. Without accurate data, Border Patrol will remain unable to manage its workforce in a more efficient and economical manner.



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### Conclusion

Border Patrol needs to manage its workforce more efficiently, effectively, and economically. CBP and Border Patrol must expedite the development and implementation of a workforce staffing model for Border Patrol as required by Congress. Without a complete workforce staffing model, Border Patrol senior managers are unable to definitively determine the operational needs for, or best placement of, the 5,000 additional agents DHS was directed to hire per the January 2017 Executive Order.

Border Patrol also needs to improve tracking of its agents' scheduled and completed duties. Lacking standard operating procedures, training, and oversight of the information entered into BPETS to document work scheduled versus actual work performed, Border Patrol may not be deploying its agents in the right locations and in the right manner to fulfill its mission. Good data is essential for Border Patrol to determine both its existing and future operational and workload requirements accurately.

### Recommendations

**Recommendation 1:** We recommend the Under Secretary for Management of DHS ensure CBP and Border Patrol expedite development and implementation of a workforce staffing model for U.S. Border Patrol as required by Congress to better inform staffing and resource deployment decisions.

**Recommendation 2:** We recommend the Under Secretary for Management of DHS ensure CBP and Border Patrol develop standard operating procedures for the Border Patrol Enforcement Tracking System; train agents on BPETS' use, capabilities, and purpose; and implement and monitor internal controls for BPETS to ensure timely and accurate scheduling and reporting on agents' actual and completed work hours and activities.

### Management Comments and OIG Analysis

The Department concurred with our two recommendations. We included a copy of the Department's management comments in their entirety in appendix B. We also received technical comments to the draft report and revised the report as appropriate.

Although the Department concurred with both our recommendations, we believe some of the statements regarding the "staffing model/decision support



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tool” referred to in DHS’ management comments are misleading and incorrect. To illustrate, the *Patrol Border Group* (initial version) described in the management comments is not a comprehensive workforce “staffing model/decision support tool” as implied. Rather, it is a standardized list of border security tasks. We recognize this list is a key step in the process, but it should not be described as a workforce staffing model.

Further, the Department’s assertion that completing the *Patrol Border Group* in September 2017 was 2 years ahead of schedule is incorrect. The Border Patrol completed the *Patrol Border Group* under the *Manpower Requirement Determination* effort, and CBP reported this to Congress in its January 2016 report, *Comprehensive Border Patrol Staffing Analysis*. By restating a completed action, CBP makes the *Patrol Border Group* work appear to be a new, separate action.

Our overall concern remains that 8 years after Congress’ 2011 mandate, Border Patrol still lacks the data and procedures needed to determine whether it is meeting workload requirements related to investigative and law enforcement activities. A summary of the Department’s response to our report and our analysis follows.

**DHS Response to Recommendation #1:** Concur. The DHS Under Secretary for Management maintains oversight of component manpower modeling efforts and has already taken steps to help CBP complete the U.S. Border Patrol workforce staffing model. To improve integration of human capital into the Department’s Planning, Programming, Budgeting, and Execution processes, on October 1, 2018, the Under Secretary realigned the DHS Manpower and Organization function from the DHS Office of the Chief Human Capital Officer to the Program Analysis and Evaluation Division within the DHS Office of the Chief Financial Officer. These two groups are increasing collaboration to ensure human capital requirements are incorporated into program analyses. The Manpower and Organization staff will also task Border Patrol to provide periodic, focused updates on the progress of its workforce staffing model development. Estimated Completion Date: September 30, 2019

**OIG Analysis:** We consider these proposed actions responsive to the recommendation, which is resolved and open. We will make a determination to close this recommendation after we review the overdue workforce staffing model that allows Border Patrol senior managers to definitively determine the operational needs and best placement of Border Patrol agents.

**DHS Response to Recommendation #2:** Concur. The Border Patrol Strategic Planning and Analysis Directorate will develop and implement policies and



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procedures; train agents on BPETS' use, capabilities, and purpose; and implement and monitor internal controls for BPETS. In addition, according to the Border Patrol Strategic Planning and Analysis Directorate, it would:

- compile/revise the complete BPETS user manual by November 30, 2018;
- issue additional guidance regarding BPETS use and data integrity by December 31, 2018;
- produce and deploy training on timesheet usage, as well as additional timesheet training at the Academy by January 31, 2019;
- publish a standard operating procedure for BPETS;
- push BPETS time and attendance data to CBP's financial systems of record, called Systems, Applications & Products; and
- introduce system checks to improve data integrity by April 30, 2019.

Estimated completion date: April 30, 2019

**OIG Analysis:** We consider these proposed actions responsive to the recommendation, which is resolved and open. CBP identified multiple actions in response to the recommendation. Before closing this recommendation, we will review all CBP's actions, including those that CBP may have already completed. The recommendation will remain open until OIG confirms that CBP has completed the policies and procedures; implemented and is monitoring internal controls for BPETS; revised its BPETS manual, BPETS standard operating procedures, and a BPETS training program and schedule for BPETS and timesheet completion; and has completed its plan for monitoring data integrity.





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## Appendix A

### Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

Our objective was to determine to what extent CBP's Border Patrol agents meet workload requirements related to investigative and law enforcement activities. We focused our audit on the GS-1896 Border Patrol law enforcement occupational series. To answer our objective, we:

- reviewed and analyzed the *Border Patrol Agent Pay Reform Act of 2014* (BPAPRA);
- reviewed Office of Personnel Management (OPM) criteria on the law enforcement 1896 series;
- obtained and reviewed departmental policies, procedures, and guidance relevant to tracking workload hours;
- obtained and analyzed data tracked in BPETS and COSS for fiscal year 2017;
- interviewed U.S. Department of Justice, Federal Bureau of Investigation officials regarding best practices in tracking workload data, as well as CBP officials regarding BPAPRA, BPETS, and workforce planning; and
- conducted site visits to four Border Patrol sectors, including 17 stations within those sectors, to interview agents and mission support personnel using a data collection instrument. We visited the following sectors and stations:
  - Detroit Sector
    - Detroit Station
    - Marysville Station
    - Gibraltar Station
    - Sandusky Bay Station
  - Miami Sector
    - Dania Beach Station
    - Marathon Station
    - West Palm Beach Station
  - Rio Grande Valley Sector
    - Brownsville Station
    - Central Processing Center
    - Fort Brown Station
    - Harlingen Station
    - McAllen Station



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- Weslaco Station
- Rio Grande City Station
- San Diego Sector
  - Brown Field Station
  - Chula Vista Station
  - Imperial Beach Station

We evaluated the reliability of BPETS, COSS, and Immigration and Customs Enforcement's Office of Human Capital and OPM's Federal employee listings data. We assessed the data in accordance with guidance in *Assessing the Reliability of Computer-Processed Data*, U.S. Government Accountability Office (GAO-09-680G, July 2009). We tested the accuracy of the agents' scheduled time from BPETS and concluded that the data were of undetermined reliability. We assessed the BPETS data reliability by reviewing existing information about the data, conducting interviews with officials from the organization; performing tests on the data; tracing data to and from source documents; and reviewing selected system controls.

We traced a sample from the BPETS G481's Daily Unit Assignment Log that we requested during our fieldwork site visits to the BPETS database provided for FY 2017.<sup>8</sup> Our review identified an inconsistency between the G481 source document and BPETS scheduled assignment. The data limitation prevented an adequate assessment of data reliability and prohibited us from precisely quantifying the hours Border Patrol agents spent on mission support functions.

We assessed the reliability of the COSS data by: reviewing existing documentation related to the data sources; electronically testing the data to identify problems with completeness or accuracy; interviewing knowledgeable agency officials about the data; and tracing a judgmentally selected sample of data to source documents. We determined that the data were sufficiently reliable for the purposes of this report.

We conducted this performance audit between June 2017 and March 2018 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

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<sup>8</sup> Border Patrol stations used the G481 for an agent's shift to depict daily assignments.



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**Appendix B**  
**CBP Comments to the Draft Report**


U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

November 29, 2018

MEMORANDUM FOR: John V. Kelly  
Senior Official Performing the Duties  
of the Inspector General  
Office of the Inspector General

FROM: Jim H. Crumpacker, CIA, CFE   
Director  
Departmental GAO-OIG Liaison Office

SUBJECT: Management Response to Draft Report: "Border  
Patrol Needs a Staffing Model to Better Plan for  
Hiring More Agents" (Project No. 17-074-AUD-DHS)

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

The Personnel Requirements Determination (PRD) Initiative began in 2013 in accordance with the Congressional direction outlined in House Report 113-91 (i.e., House Report 112-91 and the Joint Explanatory Statement accompanying Public Law 112-74). The PRD Initiative - U.S. Customs and Border Protection (CBP), U.S. Border Patrol (USBP) is a multi-faceted effort to address the requirements which included the development of a staffing model/decision support tool. The work on the staffing model/decision support tool for the Patrol Border Group (initial version) commenced in March 2017 with completion in September 2017 – two years ahead of schedule. The Patrol Border Group comprises the work executed by frontline agents, the preponderance of USBP's workforce.

To date, USBP has completed the "Patrol Border Group" first and second versions of the Staffing Tool. The second version is currently being tested. The final staffing tool will include the staffing needs of the Sector Intelligence Units, Special Operations Directorate, Operational Programs, and Professional Support staff estimates, in addition to Patrol Border Agents. This USBP Staffing Tool will help to address Presidential Executive Order 13767, "Border Security and Immigration Enforcement Improvements,"



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dated January 25, 2017, that CBP "... shall take all appropriate action to hire 5,000 additional Border Patrol agents" by providing staffing estimates based on analysis of relationships between workload and condition factors at zone, station, Sector levels."

Though the process for developing the tool may appear overly lengthy, USBP's early efforts focused on the development of foundational elements necessary for the ultimate successful completion of the staffing model. This included the performance of detailed work studies to identify the specific tasks performed by Agents as directed by House Report 113-91. Additionally, two major CBP systems, Border Patrol Enterprise Reporting Tool (BPETS) and the CBP time and attendance platforms needed to be re-engineered to allow hourly time spent performing essential mission functions to be captured.

Lastly, it is important to note that no staffing levels decisions have been or will be set utilizing the staffing model while under development. The completed staffing model/tool will incorporate multiple algorithms derived from the work studies that help to assess the conditions, workload and staffing relationships. These relationships then allow projections of staffing requirements under different workload and performance conditions.

The PRD will provide DHS and CBP with the ability to:

- identify in detail the tasks performed by Agents;
- identify required staffing levels;
- justify future year staffing requirements and support deployment strategies

This decision support tool is currently being developed. The full rollout of the completed staffing model/tool is scheduled for September 30, 2019.

The draft report contained two recommendations, with which the Department concurs. Attached find our detailed response to the recommendations. Technical comments were previously provided under separate cover.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment





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#### Attachment: Management Response to Recommendations Contained in Project No. 17-074-AUD-DHS

The OIG recommended that the DHS Under Secretary for Management (USM):

**Recommendation 1:** Ensure CBP and Border Patrol expedite development and implementation of a workforce staffing model for U.S. Border Patrol as required by Congress to better inform staffing and resource deployment decisions.

**Response:** Concur. The USM maintains oversight of Component manpower modeling efforts and has already taken steps to help CBP complete the USBP workforce staffing model. One must recognize that Border Patrol Agents (BPAs) operate in a fluid, multi-dimensional border security environment which does not lend itself as easily to modeling as other DHS frontline occupations, including CBP Officers and Transportation Security Officers. This has long complicated CBP's efforts to determine BPA staffing needs.

BPA effectiveness can be measured in many ways, including apprehensions, turnbacks, and "gotaways" (as discussed in OIG's draft report) - which despite appearing counterintuitive, quantify illegal entrants who might not have been identified without additional staffing. As a result of these challenges, along with congressional interest, the Office of the Under Secretary for Management has intensified its review of the USBP's manpower modeling and program analysis efforts.

For example, to improve integration of human capital into the Department's Planning, Programming, Budgeting, and Execution processes, on October 1, 2018, the USM realigned the DHS Manpower and Organization (M&O) function from the DHS Office of the Chief Human Capital Officer to the Program Analysis and Evaluation (PA&E) Division within the DHS Office of the Chief Financial Officer. The M&O staff is increasing collaboration with PA&E program/resource analysts to ensure human capital requirements are incorporated into program analyses, and will task CBP's USBP, Strategic Planning and Analysis Directorate (SPAD), Operational Requirements Management Division to provide periodic, focused updates on the progress of its workforce staffing model development.

Estimated Completion Date (ECD): September 30, 2019.

**Recommendation 2:** Ensure CBP and Border Patrol develop standard operating procedures for the Border Patrol Enforcement Tracking System [BPETS]; train agents on BPETS' use, capabilities, and purpose; and implement and monitor internal controls for BPETS to ensure timely and accurate scheduling and reporting on agents' actual and completed work hours and activities.





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**Response:** Concur. USBP, Strategic Planning and Analysis Directorate, Enforcement Technology Division personnel will develop and implement policies and procedures, train agents on BPETS' use, capabilities, and purpose; and, implement and monitor internal controls for BPETS by April 30, 2019.

In addition, USBP, Strategic Planning and Analysis Directorate, Enforcement Technology Division personnel will:

- Compile/revise the complete BPETS user manual by November 30, 2018,
- Issue additional guidance regarding BPETS use and data integrity by December 31, 2018,
- Produce and deploy training regarding Timesheet usage as well as additional timesheet training at the Academy by January 31, 2019,
- Publish a Standard Operating Procedure for BPETS,
- Push BPETS time and attendance data to CBP's financial systems of record, Systems, Applications & Products (SAP). BPETS data can then be validated and analyzed using SAP's Graphical User Interface or Microsoft Excel Analysis add-on to provide oversight and ensure data integrity, by March 21, 2019, and, including how to utilize Systems, Applications & Products (SAP) Graphical User Interface software to report BPETS data from CBP's financial system of record and provide oversight and improve data integrity, by March 31, 2019, and
- Introduce system checks to improve data integrity by April 30, 2019.

ECD: April 30, 2019.



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## Appendix C

### United States Border Patrol Staffing Assignments

The following are mission-essential functions and related activities performed by GS-1896 Border Patrol agents.

- Border Patrol Headquarters
- Sector Headquarters Leadership
- Collections
- Intelligence Task Force/Liaison
- Law Enforcement Technical Collection
- Field Intelligence Team
- Targeting and Analysis
- Radio Room
- Border Intelligence Center
- Geospatial Information System
- Border Patrol Tactical Unit
- Border Patrol Search, Trauma, and Rescue Unit
- Mobile Response Team
- Alliance to Combat Transnational Threats
- Specialty Programs
- Strategic Planning and Coordination
- Prosecutions
- Foreign Operations
- Training
- Traumatic Incident Management
- Policy and Compliance
- Professional Standards
- Station Leadership
- Patrol Border
- Off-Road Vehicles
- Horse Patrol
- Bike Patrol
- Riverine
- K-9
- Detainee Processing
- Traffic Check
- Transportation Check
- Supplemental Air Crew
- Task Force/Liaison
- Special Operations Group Related Activities
- Conducting Field Training
- Attending Training
- Instructing at Academy
- Drive time to/from area of responsibility (not including home to work)
- Other assignment outside Border Patrol

These functions and activities are categorized within Law Enforcement Operations, Law Enforcement Operational Programs, and Mission Readiness Operations or can be a combination of Operations, Programs, and Readiness. All functions within these categories are essential to the overall mission and operations of the Border Patrol.



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### **Appendix D**

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