

**Management Alert —  
ICE’s Training  
Model Needs Further  
Evaluation**





# DHS OIG HIGHLIGHTS

## *Management Alert — ICE's Training Model Needs Further Evaluation*

January 25, 2018

### Why We Did This Audit

This report is part of an ongoing audit to determine whether DHS has training strategies and capabilities in place to train the 15,000 new agents and officers the Department plans to hire. ICE plans to hire and train more than 10,000 agents and officers over the next 5 years.

### What We Recommend

We recommend that the ICE Acting Director independently assess, in advance of any decentralization, the agency's training needs and requirements to provide an objective analysis on ICE's training approach.

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

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

### What We Found

U.S. Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI), and Enforcement and Removal Operations (ERO) leaders are proposing to reorganize and decentralize basic and advanced ICE training programs 6 months after ICE created a separate training office and merged its training programs into a centralized model.

HSI and ERO leaders could not provide justification and their views on training conflict with the centralized training model approach. Without a thorough analysis, efforts to decentralize aspects of ICE training may prove counterproductive to benefits ICE previously identified with the centralized training model analysis. Specifically, ICE may lose any improvements in capturing expenditures and forecasting costs, projecting training requirements, and evaluating the model's effectiveness across ICE.

Furthermore, decentralization could also result in unintended consequences, such as duplicative internal training investments, inconsistent training, degradation of training, and missed opportunities to leverage cost efficiencies across ICE.

With the President's Executive Order to hire 10,000 agents and officers, it is important for ICE to make deliberate and strategic decisions about the most effective and efficient method to train its agents and officers.

### ICE Response

ICE did not concur with our recommendation and plans to return to program-led basic and advanced training, while also maintaining the centralization of cross-cutting training functions. We consider this recommendation open and unresolved.



## OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

JAN 25 2018

MEMORANDUM FOR: Thomas D. Homan  
Acting Director  
U.S. Immigration and Customs Enforcement

FROM: John V. Kelly   
Acting Inspector General

SUBJECT: *Management Alert – ICE’s Training Model Needs Further Evaluation*

For your action is our final report, *Management Alert – ICE’s Training Model Needs Further Evaluation*. We incorporated the formal comments provided by your office.

The report contains one recommendation aimed at improving ICE’s training structure. Your office did not concur with our recommendation. Based on information provided in your response to the draft report, we consider the recommendation 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.

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 John E. McCoy II, Assistant Inspector General for Audits, at (202) 254-4100.



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### Background

U.S. Immigration and Customs Enforcement (ICE) is responsible for enforcing Federal laws governing border control, customs, trade, and immigration. Two of ICE's operational directorates are Homeland Security Investigations (HSI) and Enforcement and Removal Operations (ERO). HSI is responsible for investigating a wide range of domestic and international activities arising from the illegal movement of people and goods into, within, and out of the United States. ERO enforces the Nation's immigration laws; and identifies, apprehends, detains, and removes illegal aliens from the United States.

In an April 2014 memo, "Strengthening Departmental Unity of Effort," the DHS Secretary highlighted the need to improve future resource decision making through targeted examination of specific mission and function related issues. The targeted examination's goal is to enhance DHS-wide operational planning efforts, leading to more effective operations. Furthermore, Executive Order (EO) 13781<sup>1</sup> directs heads of Federal agencies develop a proposed plan to reorganize their agency, as appropriate, in order to improve efficiency, effectiveness, and accountability.

*The mission of OTTP through positive engagement and professionalism is to provide comprehensive training that enhances leadership abilities; fosters career development opportunities; and promotes innovative law enforcement techniques and equipment, which increases the effectiveness of the ICE workforce while minimizing risks inherent to law enforcement operations.*

OTTP Mission Statement, ICE

EO 13768<sup>2</sup> requires ICE to hire and train 10,000 agents and officers.<sup>3</sup> ICE's Office of Tactical Training and Programs (OTTP) has oversight and responsibility for ensuring all ICE personnel receive consistent and effective training. OTTP establishes and preserves ICE standards for programs and courses, facilitates accreditation, and oversees content delivery to all ICE personnel. In addition, OTTP collects and analyzes data to measure training program effectiveness, and to ensure the efficient and effective use of limited training resources and assets (see appendix C for ICE's Organizational Placement of ERO, HSI, and OTTP).

<sup>1</sup> *Comprehensive Plan for Reorganizing the Executive Branch*, March 13, 2017

<sup>2</sup> *Enhancing Public Safety in the Interior of the United States*, January 25, 2017

<sup>3</sup> ICE plans to hire approximately 8,500 Enforcement and Removal Operations officers and 1,500 Homeland Security Investigations agents over the next 5 years.



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Since 2007, ICE leadership has advocated for a centralized training model, yet did not implement it until recently. In July 2016, ICE leadership conducted an internal assessment of its decentralized training programs. The assessment concluded that ICE's decentralized program lacked clearly defined roles and responsibilities and a unified command and control process, which contributed to inadequate oversight of the agency's training budget. Furthermore, the assessment recognized that a centralized model ensures one training office is responsible for all aspects of training, and puts into place uniform processes and measures to evaluate training efficiency and effectiveness.

In February 2017, ICE consolidated its multiple training programs into a centralized OTTP. This consolidation of ICE ERO, HSI, and other ICE training programs created OTTP as a single program office, with a Deputy Assistant Director and six Division Chiefs for training oversight of Mission Support, Operational Support, Basic Academy (Glynco, GA), Advanced Training (Charleston, SC), Firearms & Tactics (Fort Benning, GA/Altoona, PA), and Leadership Development (Dallas, TX).

In August 2017, HSI and ERO officials proposed that ICE revert to a decentralized training model and reorganize aspects of OTTP (see appendix B for ICE Training Model Timeline from 2007 through 2017). The rationale outlined in the memorandum is that each operational program within ICE should act autonomously to address its specific training needs and closely monitor their respective training budgets. According to ERO and HSI officials, their program offices request funding for training through their Operations Budget and allocated funding is subsequently transferred to OTTP without input on how those funds are spent.

In January 2016, we reported that DHS and six components, including ICE, lack a unified process to govern workforce training.<sup>4</sup> Furthermore, the report outlined the Department's lack of reliable training cost information and data needed to make effective and efficient management decisions. In September 2016, the Department issued a Management Directive<sup>5</sup> on employee learning and development. The directive provides guidance on component heads' responsibilities to promote consistency and effectiveness within the component through collaborative efforts that increase innovation, reduce costs, and minimize duplication.

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<sup>4</sup> *DHS' Oversight of its Workforce Training Needs Improvement* (OIG-16-19; January 2016)

<sup>5</sup> Department of Homeland Security Directive 258-05, *Employee Learning and Development* (September 2016)  
[www.oig.dhs.gov](http://www.oig.dhs.gov)



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### Results of Audit

HSI and ERO leaders are proposing to reorganize and decentralize ICE basic and advanced training programs 6 months after ICE created a separate training office and merged its training programs into a centralized model. HSI and ERO leaders could not provide justification, and their views on training conflict with the centralized training model approach. Without a thorough analysis, efforts to decentralize aspects of ICE training may prove counterproductive to benefits previously identified with the centralized training model analysis. Specifically, ICE may lose any improvements in capturing expenditures and forecasting costs, projecting training requirements, and evaluating the model's effectiveness across ICE.

Furthermore, decentralization could result in unintended consequences, such as duplicative internal training investments, inconsistent training, degradation of training, and missed opportunities to leverage cost efficiencies across ICE. With the EO 13768-directed hiring surge, it is important for ICE to make deliberate and strategic decisions about the most effective and efficient methods for training its agents and officers, while keeping in mind the importance of the Department's Unity of Effort initiative.

#### OTTP Centralized Training Program Rationale

*According to the ICE Training Consolidation Implementation Plan issued December 2016:*

*"By centralizing our training programs we will be able to rigorously assess, evaluate, and measure our performance and appropriately allocate resources to ensure effective stewardship of taxpayer dollars."*

*"Aligning our activities, core processes, and resources to our goals, objectives, and expenditures is critical to the overall success and accountability of the newly formed ICE Office of Training and Tactical Programs."*

ICE created OTTP to develop a centralized training plan for all operational directorates within ICE. However, ICE has had less than 6 months to fully implement the plan's proposed strategies and working groups, which include:

1. *Initiate a Budget Working Group* to project future training needs; develop a process to fund those needs; track expenditures; meet hiring requirements; and evaluate training results and costs as required by Congress.
2. *Initiate a Policy Working Group* to identify all existing policies and directives that could potentially be impacted by the consolidation of ICE training and recommend updates or new policies as needed.
3. *Develop a Rotational Policy* that includes consistent and effective processes for detailing



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staff to OTTP, rotating Academy instructors, and accounting for costs associated with the rotations.

### **Decentralized Training Program Rationale**

In August 2017, HSI and ERO leaders submitted a memorandum to the Acting Director requesting to decentralize and restructure OTTP based on operational needs. With the anticipated increase in hiring and training required by EO 13768, HSI and ERO proposed that restructuring OTTP will allow each operational program to act autonomously to address training needs within their respective programs. Their assessment concludes that due to the unique mission requirements for each directorate, HSI and ERO are in a more advantageous position to address their current and future training needs separately. However, HSI and ERO could not provide quantitative or qualitative analysis to support their proposed decentralized model. At the time of this Management Alert, the Acting ICE Director had not concurred with the decentralized proposal.

### **Conclusion**

Since 2007, ICE has worked on consolidating its training into a centralized model. With less than 6 months into the centralized approach and before OTTP has fully evaluated the model's benefits and weaknesses, HSI and ERO leaders are proposing to reorganize and decentralize ICE basic and advanced training programs.

With the EO 13768-directed hiring surge, it is imperative for ICE to make deliberate and strategic decisions about the most effective and efficient methods for training its agents and officers. Constant change or indecisiveness is disruptive, expensive, and counterproductive to a unity of effort approach needed.

### **Recommendations**

1. We recommend that the Acting Director of ICE conduct an independent assessment of the current training structure to determine the best mix of centralization and decentralization for training and oversight. The assessment should include a —
  - a. comprehensive cost-benefit analysis and a determination as to the best way to provide consistent and high-quality training across all program offices;



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- b. determination as to the proper placement of training programs within ICE to ensure effective oversight;
- c. process to evaluate, measure, and modify as appropriate, the training model; and
- d. determination of the best way to fund training needs agency-wide.

### **Management Comments and OIG Analysis**

ICE did not concur with our recommendation and provided comments to the draft report. A summary of ICE's response and our analysis follows. We have included a copy of ICE's management comments in their entirety in appendix A. We also received technical comments and considered those comments in preparing the final report.

**Response to Recommendation # 1: Non-concur.** ICE agreed it is important to conduct thorough assessments of its programs and asserted it has prior studies, lessons learned, and managerial experience in delivering training. ICE plans to return to program-led basic and advanced training, while also maintaining the centralization of cross-cutting training functions to better posture ICE in executing training in the most effective and efficient manner.

**OIG Analysis:** We recognize that ICE leadership takes the training of its agents and officers seriously. Although the response mentions prior studies and lessons learned, ICE did not provide those documents upon request. We remain concerned that without implementing our recommendation, ICE may be missing opportunities to build a comprehensive training strategy and structure that best meets the organization's needs. The recommendation is unresolved and will remain open until ICE provides a completed and approved training strategy that outlines how the agency addressed the elements listed in the recommendation.

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

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002*, Pub. L. No. 107-296, 116 Stat. 2135, which amended the *Inspector General Act of 1978*.

This report is part of an ongoing audit to determine whether the Federal Law Enforcement Training Center, Customs and Border Protection, and ICE have training strategies and capabilities in place to train the 15,000 new agents and officers they plan to hire. ICE is planning to hire and train more than 10,000 agents and officers over the next 5 years.



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To identify and report on ICE's Training Model structure we:

- interviewed executive leadership from ICE HSI, ERO, and the Management and Administration Division;
- interviewed officials from ICE's Office of Training and Tactical Programs, Training Academy, and Budget Office;
- reviewed and analyzed EOs 13768 and 13781, the Department's Unity of Effort initiative, and ICE Training Strategy Directive 8-1.0;
- reviewed and analyzed key internal ICE documentation, including *ICE Training Reorganization and Requirements Report*, July 2016; and
- reviewed memorandums and emails pertaining to ICE's training model and structure.

We conducted our work 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.

The Office of Audits major contributors to this report are Christine Haynes, Director; Cecilia Carroll, Audit Manager; Michael Brunelle, Program Analyst; Timothy Fonseth, Program Analyst; John Kohler, Program Analyst; Christine Meehan, Auditor; Roger Thoet, Auditor; Kevin Dolloson and Ellen Gallagher, Communications Analysts; Barry Bruner and Kirsten Teal, Independent Referencer.



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**Appendix A**  
**ICE Comments to the Draft Report**

*Office of the Chief Financial Officer*

U.S. Department of Homeland Security  
500 12th Street SW  
Washington, D.C. 20536



**U.S. Immigration  
and Customs  
Enforcement**

December 22, 2017

MEMORANDUM FOR: John V. Kelly  
Acting Inspector General  
Office of the Inspector General

FROM:  Stephen A. Roncone  
Chief Financial Officer and  
Senior Component Accountable Official

SUBJECT: Management's Response to Draft Report: "Management Alert –  
ICE's Training Model Needs Further Evaluation" (Project No. 17-  
086-AUD-ICE)

Thank you for the opportunity to review and comment on this draft report. U.S. Immigration and Customs Enforcement (ICE) appreciates the Office of Inspector General's (OIG) work in planning and conducting its review and issuing this report.

ICE is pleased to note the OIG's recognition of the importance of law enforcement training, particularly ICE's training regimen, in meeting DHS' strategic mission objectives. ICE remains committed to ensuring a homeland that is safe, secure, and resilient against terrorism and other threats.

ICE values a robust and comprehensive training program that's responsive to the needs of our officers and agents. We work closely with the Federal Law Enforcement Training Center to ensure ICE law enforcement officers receive initial and recurring training, including specialized and advanced skills that are vital to maximizing officer safety and effectiveness. As noted in the draft report, it is important to continually assess training needs and requirements, make deliberate and strategic decisions, and ensure a unity of effort approach. This is particularly applicable as ICE prepares to increase the workforce as directed by the Executive Order 13768, which requires ICE to hire and train 10,000 agents and officers. ICE leadership is focused on ensuring the previous lessons learned and training studies are thoughtfully considered and tailored program needs are met as we contemplate the optimal training structure.

The draft report contained one recommendation with which ICE non-concurs. Attached find our detailed response to the recommendation.

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

Attachment









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**Appendix D**  
**Report Distribution**

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