



Department of Homeland Security Office of Inspector General

CBP's Efficacy of Controls Over Drug Seizures





Homeland
Security

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Preface

The Department of Homeland Security Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report addresses the efficacy of Customs and Border Protection's controls for receipting and recording, transporting, storing, and disposing of drug seizures. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, reading "Anne L. Richards".

Anne L. Richards

Assistant Inspector General for Audits

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Abbreviations

CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
FY	fiscal year
FPPD	Fines, Penalties & Forfeiture Division
GAO	Government Accountability Office
GPO	Government Printing Office
SEACATS	Seized Asset and Case Tracking System
SPS	Seized Property Specialist



Department of Homeland Security
Office of Inspector General

Executive Summary

U.S. Customs and Border Protection is responsible for securing the homeland by preventing the illegal entry of people and goods. In 1990, U.S. Customs and Border Protection's (formerly U.S. Customs Service) Seized Property Program was designated as "high risk" by the Government Accountability Office, but was removed from this designation in 2003 as a result of substantially improved management and accountability of seized property, including drugs. Since 2003, the Government Accountability Office has not audited the internal controls for the seizure process. We conducted this audit to determine the efficacy of U.S. Customs and Border Protection's controls for receipting and recording, transporting, storing, and disposing of seized drugs.

Although U.S. Customs and Border Protection has policies and procedures in place, field personnel did not always receipt and record, transport, store, or dispose of seized drugs according to established policies and procedures, and in some cases, circumvented established guidance by using invalid waivers. We attributed these conditions to insufficient oversight, communication, and staffing throughout key stages of the seizure process. With the continuous influx of illegal drugs into the United States and a significant increase in drug seizures over the past 4 years, it is imperative that U.S. Customs and Border Protection comply with its established guidance to ensure that seized drugs are protected from loss, theft, or abuse, and to maintain evidentiary value in the event of legal proceedings.

U.S. Customs and Border Protection has initiated corrective actions to address some of the identified deficiencies. Based on the results of our audit, we are making four recommendations intended to increase the effectiveness of U.S. Customs and Border Protection's controls over seized drugs.

Background

In 1990, the Government Accountability Office (GAO) designated the U.S. Customs and Border Protection's (formerly the U.S. Customs Service) Seized Property Program as "high risk" following a review that revealed serious weaknesses in key internal controls and systems. These weaknesses affected the Customs Service's ability to control, manage, and report the results of its seizure efforts, including accountability and stewardship over seized property, which includes seized drugs. In 2003, GAO removed the high-risk designation because U.S. Customs and Border Protection (CBP) had substantially improved management and accountability for seized property, including seized drugs. Since 2003, GAO has not tested the implementation of internal controls for the drug seizure process.

In 2007, the Department of Homeland Security (DHS) published the National Southwest Border Counternarcotics Strategy, which focused primarily on what the U.S. government could do to prevent the illegal trafficking of drugs across the border with Mexico. Since then, CBP, in support of this strategy, has increased its investment in seizing personnel and technology in order to stop the flow of illegal drugs.

Responsibilities for seizing drugs are shared by three separate CBP law enforcement arms: the Office of Field Operations, the Office of Border Patrol, and the Office of Air and Marine. The Office of Field Operations functions at the official ports of entry into the United States, the Office of Border Patrol operates between ports of entry, and the Office of Air and Marine supports the drug seizure process with its air and maritime assets.

CBP personnel work at 327 ports of entry, 20 Border Patrol sectors (with 139 Border Patrol stations and 32 checkpoints), 46 air units, and 67 marine units. In fiscal year (FY) 2010, CBP made more than 66,000 drug seizures, approximately 50% more than in FY 2007 (see table 1). CBP is not able to estimate the cost of its drug seizure efforts. CBP concurred with all four of the recommendations in the report and has already begun to formulate plans and initiate actions to address the recommendations.

Table 1. Total Drug Seizures, FY 2007–FY 2010

CBP Law Enforcement Arms	CBP Seizures			
	2007	2008	2009	2010
Field Operations	34,097	38,918	48,681	46,808
Border Patrol	9,907	10,329	16,407	19,012
Air and Marine	211	172	233	561
Totals	44,215	49,419	65,321	66,381

Source: CBP.

CBP personnel are required to follow the policies and procedures in the *Seized Asset Management and Enforcement Procedures Handbook*¹ when processing drug seizures. This handbook contains preventive, detective, and corrective controls to assist personnel in their responsibility of maintaining the integrity of drug seizures and ensuring that drugs are safely kept from the public and maintained as evidence. In extenuating circumstances, CBP headquarters may grant field locations waivers that allow them to temporarily bypass these policies and procedures.

Results of Audit

CBP's controls for receipting and recording, transporting, storing, and disposing of seized drugs were not always effective. CBP field personnel did not always receipt and record, transport, store, or dispose of seized drugs according to the policies and procedures in its *Seized Asset Management and Enforcement Procedures Handbook*. In some cases, field personnel circumvented established guidance by using invalid waivers. CBP field personnel did not always comply with policies and procedures because of insufficient oversight, communication, and staffing throughout key stages of the seizure process. With a significant increase in drug seizures over the past 4 years, it is imperative that CBP comply with its established guidance to ensure that seized drugs are protected from loss, theft, or abuse, and to maintain evidentiary value in the event of legal proceedings.

Noncompliance With Policies and Procedures

We reviewed 637 case files from 14 CBP locations between FYs 2007 and 2009² to determine compliance with policies and procedures during key stages of the seizure process (receipt and recording, transport, storage, and disposal). CBP creates a case file for every drug seizure incident. The

¹ CBP is currently revising the *Seized Asset Management and Enforcement Procedures Handbook* to reassess the efficacy of current seized property policies and procedures.

² See appendix C for locations and number of case files reviewed.

case file includes the chain of custody 6051S form, the electronic Seized Asset and Case Tracking System (SEACATS) record, the evidence destruction form, and any other legal documentation that is required for processing the drug evidence. Fifty-seven percent of the 637 case files contained at least one indication of noncompliance with a policy or procedure. Indications included inadequate receipting and recording, improper transporting, incorrect storage, and improper disposal of seized drugs; and instances of using invalid waivers to circumvent CBP controls.

Receipting and Recording of Seized Drugs

A key control in receipting and recording of seized drugs is accurate documentation of seizure information. According to CBP policy, field personnel must record information such as the date, custodians, weight, and quantity of drugs on the chain of custody 6051S form and the evidence destruction form. Field personnel are then to transfer the information from the 6051S form to SEACATS within 24 hours from time of seizure, and a supervisor must ensure that the information on the 6051S form matches the SEACATS information. This policy ensures the integrity of the drug seizure and makes it more difficult for fraudulent changes or human error to go unnoticed. Further, other federal agencies, including the Department of Justice's U.S. Attorneys' Offices, use these CBP drug seizure forms and reports in prosecuting suspected criminals.

CBP did not conduct proper oversight of these control measures to ensure that personnel were following policies and procedures. For example, during a tour of CBP's operations in an international mailing facility, we observed a large number of backlogged khat³ seizures located in an unsecured⁴ location, with only partially completed 6051S forms. The CBP official who escorted us estimated that 400 backlogged khat seizures were awaiting processing. We also observed port personnel recording khat seizures using input dates rather than actual seizure dates. Port personnel told us that khat seizures can go unprocessed for up to 10 days. Not entering actual information about a seizure can make drug seizure cases more vulnerable to legal challenges. Khat is classified as "high-risk, illegal" in the United States, and according to a CBP official, can be used as a tool to obtain a search warrant of suspected drug dealers. However, CBP personnel at this location did not treat it as high risk and did not make its processing a priority. Figure 1 shows unprocessed khat observed during a tour

³ *Catha edulis*, commonly known as khat, is a flowering shrub native to East Africa and the Arabian Peninsula that is used as a recreational drug.

⁴ A location not meeting temporary or permanent physical security vault requirements.

of CBP's operations in an international mailing facility. Figure 2 is an example of an incomplete 6051S form.

Figure 1. Unprocessed khat with partially completed 6051S forms



Source: DHS OIG.

Figure 2. Partially completed 6051S form

a. Line Item No.	b. Description	c. Packages Number	Type	d. Measurements Qty	UM	e. Est. Dom. Value
1	Khat	1	BX	5060	gms	\$ 0

Source: DHS OIG.

At another location, we identified instances where port personnel used a rubber signature stamp in lieu of original signatures when completing the 6051S form. According to a CBP headquarters memorandum, all letters, forms, and documents signed by the Fines, Penalties & Forfeiture office must bear an original signature. No signature stamps are to be used on these official documents. If an unauthorized user misappropriated a signature stamp, it could jeopardize the integrity of the seizure case and potential prosecutions. Additionally, an official from the Federal

Bureau of Investigation said that any inconsistencies in the receipting and recording of seized drugs can create chain of custody issues, which defendants can use in an attempt to have the evidence omitted.

Transporting Seized Drugs

CBP did not ensure that personnel transported seized drugs to permanent storage or other federal agencies within required timeframes. According to CBP's policies and procedures, personnel must transfer seized drugs from temporary storage to permanent storage (where drugs are stored until destruction) or other federal agencies within 3 calendar days from the time of seizure. Permanent storage facilities must meet strict physical security requirements to ensure that seized drugs are safely and securely stored. Temporary storage facilities are only supposed to act as interim storage for seized drugs and therefore do not meet the rigorous requirements to safeguard the seized drugs. At one location, we saw that CBP personnel were not transferring drugs out of temporary storage for an additional week beyond the required timeframes. The untimely transfer of drugs increases the risk of loss and may compromise the chain of custody or the evidentiary value.

Storing Seized Drugs

CBP did not ensure that personnel stored seized drugs according to policies and procedures. CBP personnel did not consistently document drug seizure shelf weights prior to storage. According to CBP policies and procedures, upon storage, all drugs must be assigned a shelf weight, which must be documented on the 6051S form and in SEACATS. The shelf weights on the 6051S form must be verified and updated during inventories and at the time of destruction, as well as match the SEACATS record at all times.

Additionally, CBP did not always ensure that a full-time Seized Property Specialist (SPS) was assigned and responsible for managing and safeguarding drug seizures in permanent vaults. CBP headquarters requires permanent vaults to have at least one full-time SPS to oversee the vaults and ultimately be accountable for drugs stored in the vaults. We identified three instances in which drugs were stored for more than 3 calendar days in vaults that were not managed and overseen by a full-time SPS. Instead, the vaults were managed by rotating Seizing Officers, whose primary duties were not vault management. Although CBP

headquarters officials communicated their objections, they did not formally require ports to end this practice.

At one location, we identified defective tamperproof bags. Field personnel throughout the United States use this type of bag to store seized drugs. Properly sealed evidence bags ensure that drug seizures are not tampered with and that the integrity of the evidence is maintained. The bags we examined had defective glue strip seals that had dried and cracked and were therefore inadequate for the storage of seized drugs. See figures 3 and 4 for images of the defective tamperproof bags.

Figure 3. Evidence bag with broken glue lines



Source: DHS OIG.

Figure 4. Partially open evidence bag



Source: DHS OIG.

Field personnel said that they often need to rebag, reweigh, and update the 6051S form and the SEACATS record because of the defective bags.

Disposing of Seized Drugs

CBP did not ensure that personnel accurately completed destruction forms and destroyed drugs within required timeframes. According to CBP policy, Paralegal Specialists are required to issue destruction forms after 60 calendar days of the seizure for all bulk drugs above a certain weight threshold. Additionally, according to CBP's policy, seized drugs must be destroyed within 30 days after a destruction order is issued. CBP did not meet the required timeframes owing to multiple vacant SPS and Paralegal Specialist positions. According to CBP officials, the scarcity of personnel hinders their ability to manage drug seizures properly and timely. According to a CBP official, to manage case files properly and timely, Paralegal Specialists should manage not more than 250 cases at a time. At one location where destruction timeframes were not being met, Paralegal Specialists were managing an average of 385 case files each at any given time. The substantial caseload at this location made it difficult to ensure that all drug seizure cases complied with required timeframes.

28 CFR § 50.21(c) (Controlled Substance Destruction Procedures) requires entities "to prevent the warehousing of large quantities of seized contraband drugs which are unnecessary for due process in criminal cases. Such stockpiling of contraband drugs presents inordinate security and storage problems which create additional economic burdens on limited law enforcement resources of the United States."

Invalid Waivers

CBP field personnel were using invalid waivers to circumvent policies and procedures. In extenuating circumstances, such as during a natural disaster or a shortage of staff needed to handle a location's increased drug seizures, CBP headquarters can grant waivers that allow field personnel to temporarily bypass policies and procedures. Waivers are supposed to be granted on a case-by-case basis and must be (1) signed by authorized headquarters officials and (2) defined and used during specified time periods.

We found three instances in which ports were operating under invalid waivers unbeknownst to headquarters officials. At one

location, backlogged khat seizures had reached a critical level and personnel requested permission from CBP headquarters to circumvent policies and procedures to expedite the destruction of the khat backlog. SPSs were allowed to pick up drugs at the mail facility for immediate transport to the destruction site, and personnel were allowed to bypass requirements for drugs to be verified against shelf weights prior to destruction. According to field personnel, no waiver was officially documented and signed by an authorized headquarters official; instead, verbal approval was granted in February 2009 to address the backlogged khat. Officials estimated that CBP would operate under the waiver for 1 month and then resume adherence to policies and procedures once the backlog was eliminated. As a result of not having written approval, new employees who began to work at the location continued to bypass standard operating procedures from February 2009 until March 2010, approximately 1 year beyond the waiver's intended timeframe.

At another location, two invalid waivers were used to circumvent CBP policies and procedures. The first involved CBP personnel using an invalid waiver from 1995, which was issued prior to the creation of DHS. This waiver allowed the location an additional 30 days to issue a destruction order. CBP headquarters was not aware that the location was using this invalid waiver. The same location was using another waiver that had expired at least 3 months prior to our site visit, which allowed the SPS to transport drugs from temporary to permanent storage. To ensure separation of duties, CBP policy requires the CBP personnel transporting drugs and those accepting the drugs into storage to be different people. CBP headquarters was not aware that the waiver bypassing this control had expired.

CBP does not have a system to track waivers granted by CBP headquarters to field locations. Without proper oversight, CBP cannot be certain that field personnel are using waivers as intended.

Actions Taken by CBP

CBP has taken action to address several of the deficiencies identified in this report. After CBP was informed of the improper use of waivers, field and headquarters personnel took immediate action to resolve the issue. CBP agreed with our recommendation that a system to track waivers is needed and has begun to develop a waiver tracking tool.

Following our notification, CBP issued a memorandum to field offices prohibiting the use of rubber stamps in lieu of a signature. CBP reported that it received additional funding, which it will use to purchase two incinerators for two separate locations that seize a high volume of drugs. Officials said this should help CBP meet the required timeframe for destroying drugs. Additionally, CBP requested 50 new Paralegal Specialist positions and 31 new SPS positions in the President's FY 2011 budget request, and stated that it will be staffing the vacant SPS positions identified in this report and intends to conduct a staffing allocation assessment in FY 2011. Appropriate staffing will help CBP meet its timeframe requirements for destroying seized drugs.

Upon being notified of the defective evidence bags, CBP headquarters officials responsible for field locations immediately issued a memo requesting a review of all drug evidence bags in the field. Eight locations reported more than 11,000 evidence bags that did not properly seal. CBP is working to address this issue. Additionally, CBP is updating the *Seized Asset Management and Enforcement Procedures Handbook* to ensure that all field personnel understand the requirements for processing drug seizures.

Conclusion

There has been a significant increase in drug seizures by CBP over the past 4 years. As DHS continues to implement the National Southwest Border Counternarcotics Strategy and initiatives, it is imperative that CBP comply with its established guidance and address areas of noncompliance to ensure that seized drugs are protected from loss, theft, or abuse and to maintain evidentiary value in the event of legal proceedings.

Recommendations

We recommend that U.S. Customs and Border Protection:

Recommendation #1: Strengthen communication and oversight to ensure that field personnel comply with established policies and procedures regarding receipting, recording, transporting, storing, and disposing of seized drugs.

Recommendation #2: Conduct a staffing allocation assessment to staff key positions to ensure that staffing is properly aligned with seizure caseloads, and that all field locations are properly staffed with the appropriate SPS and legal case personnel to carry out their duties and responsibilities.

Recommendation #3: Develop a plan to replace defective evidence bags in the field. This plan should include—

- Identifying ports with defective evidence bags,
- Securing a contractor that can provide nondefective evidence bags, and
- Replacing defective evidence bags as soon as possible.

Recommendation #4: Implement a waiver tracking and management system.

Management Comments and OIG Analysis

CBP concurred with all four of the recommendations in the report and has already begun to formulate plans and initiate actions to address the recommendations.

Management Response to Recommendation #1:

CBP concurred: CBP agreed with the need to strengthen communication and oversight to ensure that field personnel comply with established policies and procedures regarding receipting, recording, transporting, storing, and disposing of seized drugs. The Fines, Penalties and Forfeiture Division (FPFD) plans to augment its oversight program by conducting Fines, Penalties and Forfeiture office site short notice surveys and by creating a specific oversight branch that will monitor personnel compliance with policies and procedures for processing drug seizures. FPFD plans to have these changes implemented by June 30, 2011.

OIG Analysis: Management's response indicated how FPFD plans to address this recommendation; however, the other CBP offices and divisions, including Office of Border Patrol, responsible for receipting, recording, transporting, storing, and disposing of seized drugs have not indicated how they plan to address this recommendation. This recommendation is unresolved and will remain open until documentation is received from all CBP offices and divisions responsible for handling drug seizures. The documentation they submit must indicate how they implemented the recommendation and how the implementation will strengthen communication and oversight and ensure that personnel are complying with policies and procedures for processing drugs seizures.

Management Response to Recommendation #2:

CBP concurred: CBP agreed with the need to conduct a staffing allocation assessment to staff key positions to ensure that staffing is properly aligned

with seizure caseloads, and that all field locations are properly staffed with the appropriate SPS and legal case personnel to carry out their duties and responsibilities. On January 3, 2011, FPDF obtained a cost estimate for updating its Resource Optimization and Resource Allocation models. FPDF plans to implement this recommendation by March 1, 2011.

OIG Analysis: Management's response indicated how FPDF plans to address this recommendation; however, the other CBP offices and divisions (including Office of Border Patrol) responsible for receipting, recording, transporting, storing, and disposing of seized drugs have not indicated how they plan to address this recommendation. This recommendation is unresolved and will remain open until documentation is received indicating the staffing allocation assessment was conducted for all CBP offices and divisions responsible for handling drug seizures and those CBP offices and divisions have analyzed the results to determine whether their staffing is adequate based on seizure caseloads and position responsibilities.

Management Response to Recommendation #3:

CBP concurred: CBP agreed with the need to develop a plan to replace defective evidence bags in the field. CBP stated that the plan includes forwarding bags identified as defective to the Government Printing Office (GPO) for examination and GPO contacting the evidence bag vendor for necessary action, increasing the amount of adhesive used on each bag, including proper sealing instructions on every bag, distributing a training video to the appropriate personnel showing step-by-step instructions for properly sealing the bags, and developing a system of internal controls for monitoring the quality of evidence bags. CBP plans to implement this recommendation by June 1, 2011.

OIG Analysis: This recommendation is resolved but will remain open until documentation is received verifying that the recommendation was implemented and CBP has replaced all defective evidence bags in the field.

Management Response to Recommendation #4:

CBP concurred: FPDF agreed and has developed and implemented a waiver tracking and management system. It is looking at enhancing the Waiver Tracking System capabilities through SharePoint by June 1, 2011.

OIG Analysis: This recommendation is resolved but will remain open until documentation is received verifying that all CBP offices responsible for seizing and processing drug seizures are using the new waiver tracking and management system.

Appendix A

Purpose, Scope, and Methodology

This report provides the results of our work to determine the efficacy of U.S. Customs and Border Protection's controls over seized drugs, including controls for receipting and recording, transporting, storing, and disposing of seized drugs. We reviewed 637 case files from 14 CBP locations with the highest amount of drug seizures between FY 2007 and FY 2009. As part of our location selection, only drug seizures with drug weights considered beyond personal use, as codified by 19 CFR 171.51(b)(6) (Personal use quantities), were counted toward the total drug seizure population. CBP headquarters provided the total drug seizure numbers for FYs 2007–2009 and the number of defective evidence bags, neither of which were verified during this audit.

We assessed compliance with CBP's policies and procedures in the key stages of the seizure process: receipting and recording, transporting, storing, and disposing of drug seizures. For each seizure stage, we tested key internal controls based on the *Seized Asset Management and Enforcement Procedures Handbook*. Site visits consisted of CBP personnel interviews and direct observations of CBP handling of seized drugs throughout each of the key stages of the seizure process.

We conducted our audit between December 2009 and August 2010 under the authority of 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 on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

Appendix B

Management Comments to the Draft Report

1300 Pennsylvania Avenue NW
Washington, DC 20229



**U.S. Customs and
Border Protection**

January 26, 2011

MEMORANDUM FOR RICHARD L. SKINNER
INSPECTOR GENERAL
DEPARTMENT OF HOMELAND SECURITY

FROM: Assistant Commissioner
Office of Internal Affairs

SUBJECT: U.S. Customs and Border Protection's Response to the Office of Inspector General's Draft Report Entitled, "CBP's Efficacy of Controls Over Drug Seizures"

Thank you for providing us with a copy of your draft report entitled "CBP's Efficacy of Controls Over Drug Seizures," dated December 28, 2010. We appreciate the opportunity to review and respond to the report. The report identifies measures U.S. Customs and Border Protection (CBP) can take to improve its process to safeguard seized drugs.

The report includes four recommendations. The recommendations and CBP's actions to address the recommendations are described below.

Recommendation #1: Strengthen communication and oversight to ensure that field personnel comply with established policies and procedures regarding receipting, recording, transporting, storing, and disposing of seized drugs.

CBP Response: CBP concurs with the recommendation.

For over a year, the Fines, Penalties and Forfeiture Division's (FPFD) goal has been to develop a more robust oversight program that would enhance communication and focus on field compliance with established policies and procedures. FPFD has been in the process of formally proposing the creation of a specific oversight branch for this purpose. In an effort to maintain oversight and communication with the field the FPFD will continue: (1) conducting Fines, Penalties & Forfeiture (FP&F) officer quarterly conference calls to communicate policy and significant issues regarding the program to the field; (2) posting informational notices, policy and other program relevant material in SharePoint; (3) assessing FP&F offices monthly by reviewing SEACATS case and property data; (4) conducting unannounced permanent vault reviews and oversight; and (5) expanding the oversight program by conducting FP&F office site short notice surveys. **Due Date:** June 30, 2011

Recommendation #2: Conduct a staffing allocation assessment to staff key positions to ensure that staffing is properly aligned with seizure caseloads, and that all field locations are properly staffed with the appropriate SPS and Legal Case personnel to carry out their duties and responsibilities.

CBP Response: CBP concurs with the recommendation.

On January 3, 2011, FPDF obtained a cost estimate for updating the Resource Optimization Model and Resource Allocation Model for FP&F staff. FPDF will be looking for funding. **Due Date:** March 1, 2011

Recommendation #3: Develop a plan to replace defective evidence bags in the field. This plan should include:

- Identifying ports with defective evidence bags,
- Securing a contractor that can provide nondefective evidence bags, and
- Replacing defective evidence bags as soon as possible.

CBP Response: CBP concurs with the recommendation.

CBP will develop a plan to identify defective bags and remove them from inventory. Bags identified as defective will be forwarded to the Government Printing Office (GPO) for examination. GPO will contact the evidence bag vendor for necessary action.

CBP will increase the amount of adhesive used on each bag as well as including proper sealing instructions on every bag; CBP will distribute a training video to the appropriate personnel showing step-by-step instructions for properly sealing the bags; and, CBP will develop a system of internal controls for monitoring the quality of evidence bags. This will include developing a process for random sampling as well as an analysis regarding shelf life. **Due Date:** June 1, 2011

Recommendation #4: Implement a waiver tracking and management system.

CBP Response: CBP concurs with the recommendation.

A Waiver Tracking System has been developed and implemented by the FPDF (for use by Office of Field Operations). FPDF is looking at enhancing the Waiver Tracking System capabilities through SharePoint. **Due Date:** June 1, 2011

Technical comments to this report will be provided to the OIG electronically. With regard to the classification of the draft report, CBP has not identified any information within this report that warrants a "For Official Use Only" classification.

As always, CBP appreciates the opportunity to highlight our continuing efforts to improve our performance, and to provide additional information to the OIG regarding our future efforts that not only address the OIG recommendations, but will also improve our overall operational effectiveness.

If you have any questions regarding this response, please contact me or have a member of your staff contact Robin White, Deputy Director, Management Inspection Division, Audit Management and Liaison, at (202) 344-1061.

**CBP SITE LOCATIONS
NUMBER OF DRUG SEIZURES AND CASES FILES**

CBP Location	Number of Drug Seizures FY 2007–FY 2009	Cases Reviewed
Location 1	27,287	175
Location 2	4,136	30
Location 3	4,028	30
Location 4	3,684	48
Location 5	3,672	30
Location 6	3,410	30
Location 7	2,064	48
Location 8	1,870	49
Location 9	1,870	30
Location 10	1,775	30
Location 11	1,742	30
Location 12	1,616	47
Location 13	1,534	30
Location 14	1,382	30
Total Seizures and Cases	60,070	637

Appendix D

Major Contributors to this Report

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