



Department of Homeland Security Office of Inspector General

U.S. Customs and Border Protection's Ground Transportation of Detainees



JAN 11 2011



Homeland
Security

Preface

The Department of Homeland Security (DHS) 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 effectiveness of U.S. Customs and Border Protection's efforts to create a plan to provide efficient ground transportation for detainees. 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

Table of Contents/Abbreviations

Executive Summary	1
Background	2
Results of Audit	3
CBP Does Not Have a Comprehensive Approach for Determining Transportation Needs.....	3
CBP Did Not Provide Adequate Oversight of the Transportation PMO	6
CBP Is Ill-prepared to Make Long-Term Transportation Decisions	7
Recommendations.....	7
Management Comments and OIG Analysis	8

Appendices

Appendix A: Purpose, Scope, and Methodology.....	11
Appendix B: Management Comments to the Draft Report	13
Appendix C: Detainee Transportation Process.....	16
Appendix D: Major Contributors to This Report	17
Appendix E: Report Distribution	18

Abbreviations

CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
FY	Fiscal Year
ICE	U.S. Immigration and Customs Enforcement
OIG	Office of Inspector General
PMO	Program Management Office

Executive Summary

U.S. Customs and Border Protection is responsible for securing the Nation's borders while facilitating legitimate trade and travel. The agency often requires transportation services for illegal aliens apprehended at or between U.S. ports of entry. This includes medical escort, transport to U.S. Immigration and Customs Enforcement facilities, and transport to and from local jails and courts. Our objective was to determine whether the U.S. Customs and Border Protection Transportation Program Management Office developed an effective plan to provide efficient and cost effective ground transportation for detainees.

The U.S. Customs and Border Protection Transportation Program Management Office has not developed an effective plan to provide efficient and cost effective ground transportation for detainees. It has not developed a comprehensive approach for identifying and evaluating current transportation uses and therefore has been unable to develop a model to predict future transportation requirements. U.S. Customs and Border Protection has not clearly defined the scope and authority of the Transportation Program Management Office or provided sufficient management and oversight of the office to ensure that it accomplished its mission.

U.S. Customs and Border Protection has spent more than \$229 million on transportation services and the Transportation Program Management Office since August 2006. Without a thorough evaluation of the current uses and future requirements for transportation services, U.S. Customs and Border Protection is ill-prepared to make an informed long-term decision for transportation services when the existing transportation contract expires in August 2011.

We are making two recommendations that, if implemented, would help U.S. Customs and Border Protection's efforts in identifying and implementing comprehensive ground transportation solutions. The U.S. Customs and Border Protection concurred with both recommendations and has begun to formulate plans and initiate actions to address the recommendations.

Background

U.S. Customs and Border Protection (CBP) is responsible for securing the Nation's borders while facilitating legitimate trade and travel. Within CBP, the Office of Field Operations (Field Operations) relies on Customs and Border Protection Officers (officers) for the security and flow of people and cargo at ports of entry, whereas the Office of Border Patrol (Border Patrol) relies on Border Patrol Agents (agents) for maintaining border security between ports of entry.

Field Operations and the Border Patrol often require transportation services. These services include transporting illegal aliens apprehended at or between the ports of entry to medical facilities, to U.S. Immigration and Customs Enforcement (ICE) facilities, and to and from local jails and courts. Appendix C contains more details on the transportation of detainees.

In 2004, the Undersecretary for Border and Transportation Security issued a memorandum instructing that the apprehending agency is responsible for all costs associated with the care and custody of aliens until they are turned over to ICE. ICE initially provided CBP with 170 agents to perform transportation services. In 2006, ICE recalled its agents to comply with the memorandum.

In August 2006, CBP awarded a transportation contract that provided support to CBP sectors and ports along the Southwest Border. The 5-year contract was intended as a stopgap measure to allow the agency the opportunity to identify alternative solutions during a transition period. The initial budget for the contract was \$50 million, funded through an interagency agreement with ICE.

In March 2007, the Secure Border Initiative created the detainee Transportation Program Management Office (PMO) to oversee the detainee transportation contract and develop a more efficient transportation solution at and between border ports of entry. In fiscal year (FY) 2008, the budget for the contract and the Transportation PMO was \$75 million, which increased to \$83 million per year in FYs 2009 and 2010.

In 2008, the Secure Border Initiative approved the Transportation PMO's charter, which tasked the office to implement new transportation capabilities through any mix of in-house, contract, or reimbursable support resources. The charter explains that the Transportation PMO is responsible for assisting Field Operations

and Border Patrol in gathering, analyzing, and prioritizing operational needs as well as establishing processes to validate and prioritize transportation requirements. According to the Program Management Plan, the Transportation PMO functions as a major acquisition project to design and implement an integrated system of detainee transportation, security, and administrative support.

In October 2008, the Transportation PMO was moved from the Secure Border Initiative to the Border Patrol's Strategic Planning, Policy, and Analysis Division. According to CBP officials, the transition occurred as a result of reorganization within the Security Border Initiative, allowing the Secure Border Initiative to focus on its program priorities. As of August 2010, the Transportation PMO was staffed with seven CBP personnel and one contractor for technical support.

From August 2006 through July 2010, CBP has spent approximately \$291 million on the Transportation PMO and the transportation contract. The transportation contract expires in August 2011, requiring CBP to make decisions for developing and implementing future transportation solutions.

Results of Audit

CBP Does Not Have a Comprehensive Approach for Determining Transportation Needs

Although CBP chartered the Transportation PMO to develop more efficient ground transportation capabilities, the office has not fulfilled its mission. The Transportation PMO did not establish a process to identify, analyze, or validate comprehensive transportation needs and did not provide well-supported options for addressing future transportation needs. CBP did not clearly define the scope and authority of the Transportation PMO or provide sufficient oversight to ensure that it accomplished its mission.

Identifying, Analyzing, and Validating Transportation Requirements

The Transportation PMO did not develop a plan to identify, analyze, or validate the level of transportation required for illegal aliens, which would include the actual hours CBP officers and agents and the CBP contractor dedicate to performing these services. This information is necessary for the office to create a

model to predict transportation requirements. In turn, those requirements are necessary for the Transportation PMO to develop a cost effective and efficient plan to address CBP's ground transportation needs for illegal aliens.

CBP uses the Border Patrol Enforcement Tracking System and CBP Overtime Scheduling System for time and attendance, but these systems do not capture or track data related to the time officers and agents spend specifically on transportation and guard services. CBP did not consider using some existing sources of information that might have assisted them in identifying transportation needs, such as the following:

- Records of Persons and Property Transferred (Form I-216): Reports the number of trips to ICE facilities, local correctional facilities, or repatriation to Mexico.
- Treatment Authorization Request: Reports trips to medical facilities.
- Command Center Event/Shift Supervisor Log: Reports when CBP officers must leave their primary duty stations to provide transportation at some ports of entry.

Instead, in January 2010, the Transportation PMO asked field offices and border sectors to estimate the number of hours that officers and agents spent on transportation services in FY 2009. The Transportation PMO did not provide specific instructions on how to estimate the hours used, but instead relied on the officers', agents', and their supervisors' memories of what took place up to 15 months previously.

Additionally, the Transportation PMO does not verify the number of hours reported by the contractor or the number of detainees moved during the trips. Instead, the Transportation PMO used the contractor's self-reported data to identify contractor services and the level of contractor support needed. Field contracting officer's technical representatives met with CBP representatives from Field Operations and Border Patrol to schedule contractor hours and routes without validating the services reported.

Identifying Optimal Actions to Meet Future Transportation Requirements

The Transportation PMO did propose a set of transportation solutions to replace the current contract when it expires. These proposals included awarding a new contract for transportation

support, hiring additional officers and agents to perform the transportation duties, and creating a new type of position and hiring detention enforcement officers¹ to perform transportation duties. The Transportation PMO presented these options to the Executive Coordinating Council, an overarching group established to review integration of detainee transportation and related guard services for Field Operations and Border Patrol, showing the replacement contract as the low cost alternative. However, the Transportation PMO did not adequately evaluate and present the costs associated with these options to identify the optimal solutions for transportation requirements.

Our review of the information the Transportation PMO provided to the Executive Coordinating Council showed that the Transportation PMO:

- Did not have adequate support for its estimate of future transportation requirements;
- Overstated the cost of the detention enforcement officer position by \$89 million;
- Overstated the cost of hiring additional officers and agents by \$75 million; and
- Understated contract costs by \$22 million.

The Transportation PMO used CBP's FY 2011 budget model as a basis for the life cycle cost estimate of the detention enforcement officer position as well as the costs for CBP officers and agents. In contrast, the office used FY 2009 actual expenses adjusted for inflation as a basis for the contract alternative.

We reviewed these models and identified that the Transportation PMO included inappropriate costs for each government employee² for personal compensation awards, relocation, long-distance phone calls, and recruitment expenses, which were not included for the contractor. The Transportation PMO overstated the detention enforcement officer option by using an inflated grade level. In addition, the Transportation PMO understated the contract costs by excluding the amounts spent on continuous contract support and oversight.

¹ A Detention Enforcement Officer would be a newly formed position within CBP, focused primarily on transportation functions. The position would also be able to provide support for additional activities as needed by CBP. This position would not have the full law enforcement responsibilities of a CBP agent or officer and would use a lower pay structure.

² This includes the proposed detention enforcement officer and additionally hired officers and agents.

The Transportation PMO also included overhead expenses already incurred by the government such as General Services Administration rental payments, utilities, and shipping fees that should not significantly increase with the addition of the detention enforcement officer position.

CBP Did Not Provide Adequate Oversight of the Transportation PMO

The agency has not provided adequate management and oversight for the Transportation PMO. CBP did not provide criteria that clearly defined the scope, authority, or performance expectations of the office. Without establishing performance expectations and monitoring the Transportation PMO's execution of its mission, CBP was not able to ensure that the office identified and presented appropriate future solutions for transportation requirements.

Transportation PMO Not Following its Charter

CBP has not ensured that the Transportation PMO is fulfilling its mission as defined in its charter. The charter establishes the office's overall mission broadly in some sections, yet narrows its functions and responsibilities to contract-related tasks in others. For example, the charter tasks the Transportation PMO to assist Field Operations and Border Patrol sponsors to gather, analyze, validate, and prioritize operational requirements and ensure that transportation solutions meet end users' requirements. Yet it further defines the scope of the Transportation PMO to:

- Provide oversight and visibility of current contract service.
- Develop an integrated system of detainee transportation, security, and administrative support.
- Implement short-term and stopgap strategies pending development of long-term capabilities.
- Identify acquisition strategies that provide transportation solutions.

The Transportation PMO selected what functions it performed and limited its focus to the contract in place and planning for a follow-on contract. Transportation PMO leadership explained that they believed theirs was an acquisition management office with limited influence over CBP operations affecting officers and agents. The Transportation PMO Director believes the office cannot impose

changes outside of the transportation contract and should therefore limit itself to a narrow contract management role.

CBP did not establish clear performance expectations to evaluate the Transportation PMO. The Transportation PMO established five performance goals for FY 2010, but none of the goals addressed how effectively the Transportation PMO program met the missions defined in its charter. Additionally, the five goals were not measurable and were limited to acquisition compliance and contract management. The CBP official responsible for overseeing the Transportation PMO acknowledged that he assumed that the office was functioning as intended without performing close oversight to ensure that it met its mission.

CBP Is Ill-prepared to Make Long-term Transportation Decision

CBP is ill-prepared to make a long-term decision for detainee transportation. CBP has invested more than \$291 million in the Transportation PMO and its activities to implement more efficient ground transportation solutions. However, the agency has no assurance that the optimal transportation solution has been identified to meet future requirements. Without complete information and analysis, CBP does not know if its officers and agents perform excessive collateral transportation services or if the agency's plans to award a new contract for transportation services will meet its needs efficiently.

The agency plans to invest an estimated \$400 million over 5 years for transportation solutions when the current contract ends in August 2011. Before CBP makes this investment, it should ensure that the Transportation PMO clearly identifies CBP's transportation needs with a thorough analysis of alternatives to support the most cost effective long-term solution.

Recommendations

We recommend that the Chief, U.S. Border Patrol and the Assistant Commissioner, Office of Field Operations:

Recommendation #1: Establish a methodology to identify current transportation requirements, create a model to predict future

requirements, and identify the optimal mix of resources to meet those requirements.

Recommendation #2: Provide sufficient management and oversight to ensure accountability for performing the analysis of current and future transportation needs.

Management Comments and OIG Analysis

CBP concurred with both of the recommendations in the report and the agency has already begun to formulate plans and initiate actions to address the recommendations. CBP expressed concern that the report does not acknowledge some of the significant efforts on the part of the Transportation PMO, thereby negatively skewing the balance and tone of the report. We recognize the PMO's efforts; however, the agency's official response provided general statements without the documentation and evidence to refute the message of our report. CBP explained that the PMO adhered to the DHS acquisition program management policy and guidance and used an approved Analysis of Alternatives Study Plan to guide their cost benefit analysis. While CBP may have used the approved Study Plan, the draft report identifies internal control weaknesses with CBP's approach to determining its transportation needs. Specifically, the Transportation PMO did not establish a process to identify, analyze, or validate comprehensive transportation needs. We continue to assert this is necessary information to use as a foundation for a realistic cost analysis.

CBP disagreed with the OIG's conclusion that the Transportation PMO overstated the cost of the detention enforcement officer and the cost of hiring additional Office of Field Operations officers and Border Patrol agents. The agency noted that even if all cost adjustments recommended by the OIG were made, the five year estimates would not change the fact that contracting is still the low cost alternative. The OIG reviewed all documentation provided by the PMO, held meetings with the PMO to discuss the cost analysis methodology, and briefed PMO management on multiple occasions. Our report does not disagree that using a transportation contract may be the lowest cost option, but emphasizes the absence of basic data elements and unnecessary overhead expenses makes the cost analysis unreliable for CBP to make an informed long-term transportation decision. The OIG team attempted to further discuss and gather evidence to support CBP's position; however,

the agency cancelled the meeting and did not provide additional supporting documentation.

CBP expressed concern with the OIG's conclusion that the agency has not provided adequate oversight to the Transportation PMO. Our conclusion is based on the absence of specific criteria that clearly defined the scope, authority, or performance expectations of the office, leaving the PMO to limit its focus to the contract in place and planning for a follow-on contract and not managing the comprehensive transportation program.

We consider the recommendations unresolved and open until more information is provided. CBP's response also included technical comments which provided additional details and clarification that was unavailable at the time of our fieldwork. We considered these comments when preparing the final report and, where appropriate, modified the report. A summary of the recommendations and CBP's actions to address the recommendations follows.

Management Response to Recommendation #1:

CBP concurred: CBP agreed with the need to establish a methodology to identify current transportation requirements, create a model to predict future requirements, and identify the optimal mix of resources to meet those requirements. The agency confirmed that the ideal data collection methodology would include activity-based data captured real or near real time. The data would be verified and validated, and made available to decision makers on a timely basis. The method must integrate collection activity between Border Patrol and Field Operations whose operations are substantially different from each other. It must identify and accurately allocate the correct time and resources spent on multiple, but concurrent activities such as line watch and transporting apprehended aliens.

CBP plans to assess the cost and feasibility of a system with the need to minimize operational impact and increase effectiveness and efficiency. In the meantime, Border Patrol and Field Operations have begun a process of collecting requirements from data calls and survey instruments. The data will be verified and validated by comparing existing databases and prior submissions. The agency will also collect data from a modified random sampling of locations that transport a high number of aliens to independently validate data. CBP indicated that the PMO has been using several modeling approaches developed by a contractor to

analyze transportation routes to determine the optimal mix of staffing resources such as detention enforcement officers, contractors, and CBP personnel. CBP will collect data more frequently to reduce error and improve data quality. The agency plans to complete a feasibility study by June 30, 2012.

OIG Analysis: We appreciate CBP's efforts to move towards a data collection methodology would include activity-based data captured real or near real time. Although CBP has begun collecting more information and agreed to conduct a feasibility study to assess the cost and feasibility of such a system, the agency did not provide sufficient details on its effort and commitment to identify accurate transportation requirements create a model to predict future requirements, and identify the optimal mix of resources. This recommendation is unresolved and will remain open.

Management Response to Recommendation #2:

CBP concurred: CBP responded that management oversight to provide guidance and to ensure accountability for accurately determining current and future transportation needs is important. The agency agreed to provide more management and oversight to ensure accountability for performing the analysis of current and future transportation needs. CBP indicated that Border Patrol provided oversight of the Transportation Office, but acknowledged the office could do more to improve management oversight. CBP will review the charters for the PMO and the ECC and make revisions to better define the scope of the PMO and clarify the roles and responsibilities of each no later than April 30, 2011.

CBP has recently established a Component Acquisition Executive to provide acquisition oversight of the Transportation program and similar programs. This management oversight will include a quarterly program review with the Component Acquisition Executive beginning no later than March 31, 2011.

OIG Analysis: This recommendation is unresolved and will remain open. We recognize CBP's efforts to provide acquisition oversight of the Transportation program; however, more details are needed to understand how Border Patrol will improve management oversight. We also need to review all modifications made to the PMO and ECC charters to ensure the intent of the recommendation is satisfied.

Our objective was to determine whether the U.S. Customs and Border Protection (CBP) Transportation Program Management Office (PMO) developed an effective plan to provide efficient and cost effective ground transportation for detainees.

To accomplish our objective, we reviewed and analyzed applicable laws and regulations; prior audit reports; CBP documentation establishing and managing the Transportation PMO, Executive Coordinating Council, and Integrated Project Team outputs; and contract documents related to transportation services from August 2006 through August 2010.

We interviewed CBP headquarters personnel from the Secure Border Initiative, Field Operations, and Border Patrol, including staff from the Transportation PMO. We also spoke with personnel from the Office of Border Patrol Workforce Management, Finance and Logistics branches, CBP Acquisition and Program Management Offices, as well as personnel from Transportation PMO contractor companies.

We analyzed cost models that the Transportation PMO used to estimate contract and CBP alternatives to support long-term transportation decisions. We also reviewed analysis performed by Transportation PMO contractors that the office included in its cost models. We reviewed data from apprehension and timekeeping systems to see whether they contained information that CBP could use to determine transportation needs.

We selected and visited field locations in California and Arizona based on high rates of apprehensions and border-crossing statistics. We toured one Border Patrol station and two ports of entry in San Diego, CA, and two Border Patrol stations and two ports of entry in Tucson, AZ. We also visited the Border Patrol and Field Operations headquarters offices in both locations. During these visits, we spoke with field personnel, including chiefs, shift supervisors, and agents at Border Patrol stations and at Border Patrol sectors. We spoke with port directors, watch commanders, and CBP officers at ports of entry and Field Operations offices.

We conducted this performance audit between April and September 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

Appendix A
Purpose, Scope, and Methodology

conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix B

Management Comments to the Draft Report

1300 Pennsylvania Avenue NW
Washington, DC 20229



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

December 13, 2010

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, "U.S. Customs and Border Protection's Ground Transportation of Detainees Program"

Thank you for providing us with a copy of your draft report entitled "U.S. Customs and Border Protection's Ground Transportation of Detainees Program," dated November 2010. We appreciate the opportunity to review and respond to the report. The report addresses the effectiveness of U.S. Customs and Border Protection's (CBP) efforts to create a plan to provide efficient ground transportation for detainees.

After careful review, we believe the draft report does not acknowledge some of the significant efforts on the part of the Transportation Program Management Office (PMO), thereby negatively skewing the balance and tone of the report. For example, the Office of Inspector General (OIG) concluded that CBP does not have a comprehensive approach for determining transportation needs and that CBP did not provide adequate oversight of the Transportation PMO. The Transportation PMO adhered to Department of Homeland Security (DHS) acquisition program management policy and guidance. In support of this process, the Transportation PMO developed an Analysis of Alternatives (AoA) Study Plan that was endorsed by the Executive Coordinating Council (ECC) and approved by the Chief, Office of Border Patrol (OBP). The AoA Study Plan defined the scope of the cost benefit analysis to be performed, defined the estimate approach, identified the ground rules and assumptions, and assigned various CBP organizational subject matter experts, as well as agents and officers to participate in the Life Cycle Cost Estimate Working Group.

Furthermore, the OIG reported that the Transportation PMO overstated the cost of the Detention Enforcement Officer (DEO) position by \$89 million and the cost of hiring additional Office of Field Operations (OFO) Officers and Border Patrol Agents by \$75 million. This conclusion is based upon a lack of understanding of the methodology used to develop these estimates. The Transportation PMO worked closely with the CBP Office of Administration to develop a cost model to estimate the costs associated with hiring additional officers and agents or DEOs. In addition, it should be noted that even if all cost adjustments recommended by the OIG were made, the five year estimates would not change the fact that contracting is still the low cost alternative.

The Transportation PMO is also not without oversight and scrutiny at the CBP and DHS level. The Transportation PMO has received positive input and review from various offices, including the Chief

Appendix B

Management Comments to the Draft Report

2

Financial Officer, and the DHS Chief Procurement Officer, DHS Acquisition Program Management Division. Also, the OIG misconstrued and took out of context a statement attributed to a CBP official responsible for overseeing the Transportation PMO. The OIG stated that the CBP Official "...acknowledged that he assumed that the office was functioning as intended without performing close oversight to ensure that it met its mission." The official would like to correct the record to reflect that his intent was to convey to the auditors that he believed this program was one of the best run programs within his division and was receiving oversight from several entities to include at the CBP and DHS levels, and therefore, did not need the same type of day to day oversight as his other programs.

We are providing technical comments separately, and request that these additions be considered in the final report.

The report includes two recommendations that the OIG believes, if implemented, would help CBP's efforts in identifying and implementing comprehensive ground transportation solutions. The recommendations and CBP's actions to address the recommendations are described below.

Recommendation #1: Establish a methodology to identify current transportation requirements, create a model to predict future requirements, and identify the optimal mix of resources to meet those requirements.

CBP Response: CBP concurs with the recommendation. The Transportation PMO explored existing databases and determined that no single database or combination of databases could be used to accurately capture requirements to transport and guard detainees. However, without real time data, the PMO had to develop the process to gather, verify and validate transportation data to develop a baseline and to inform the development of a future cost benefit model. The process they created included conducting a survey of the field offices and border patrol sectors, and verifying and validating data with various program managers and subject matter experts such as the Contracting Officer's Technical Representatives. Information from existing databases, such as apprehension and apprehension event data, were used to assist in the validation and verification process. Unfortunately, this process was one that the OIG did not believe adequately captured the actual hours dedicated to transport needs. We agree that the ideal data collection methodology would include activity-based data captured real or near real time. The data would be verified and validated, and made available to decision makers on a timely basis. Most importantly, such a method must integrate collection activity between OBP and OFO whose operations are substantially different from each other. Furthermore, it must identify and accurately allocate the correct time and resources spent on multiple, but concurrent activities such as line watch and transporting apprehended aliens.

CBP will assess the cost and feasibility of such a system with the need to minimize operational impact and increase effectiveness and efficiency, if any. In the meantime, OBP and OFO have begun a process of collecting requirements from data calls and survey instruments. The data will be verified and validated by comparing existing databases and prior submissions. Further, we will collect data from a modified random sampling of locations that transport a high number of aliens to independently validate data collected vis-à-vis structured surveys. Also, we have been using several modeling approaches developed by a contractor to analyze transportation routes to determine the optimal mix of staffing resources such as detention enforcement officers, contractors, and CBP personnel. Lastly, we will collect data more frequently to reduce error and improve data quality. We will complete the feasibility study by June 30, 2012.

Appendix B

Management Comments to the Draft Report

3

Recommendation #2: Provide sufficient management and oversight to ensure accountability for performing the analysis of current and future transportation needs.

CBP Response: CBP concurs with the recommendation. Management oversight to provide guidance and to ensure accountability for accurately determining current and future transportation needs has been, and will continue to be of utmost importance to us. As such, OBP as the Executive Agent, provided oversight of the Transportation Office by holding weekly meetings with management, participating in all quarterly Joint Program Management Reviews, and chairing the ECC, a group designed to oversee the integration of the technical and tactical support given to both the Border Patrol and OFO. Nevertheless, we understand that we can do more to improve our management oversight. We will review the charters for the PMO and the ECC and revise where appropriate to better define the scope of the PMO and clarify the roles and responsibilities of each no later than April 30, 2011. Most importantly, CBP has recently established a Component Acquisition Executive (CAE) to provide acquisition oversight of such programs as the Transportation program. This management oversight will include a quarterly program review with the CAE beginning no later than second quarter 2011 or by March 31, 2011.

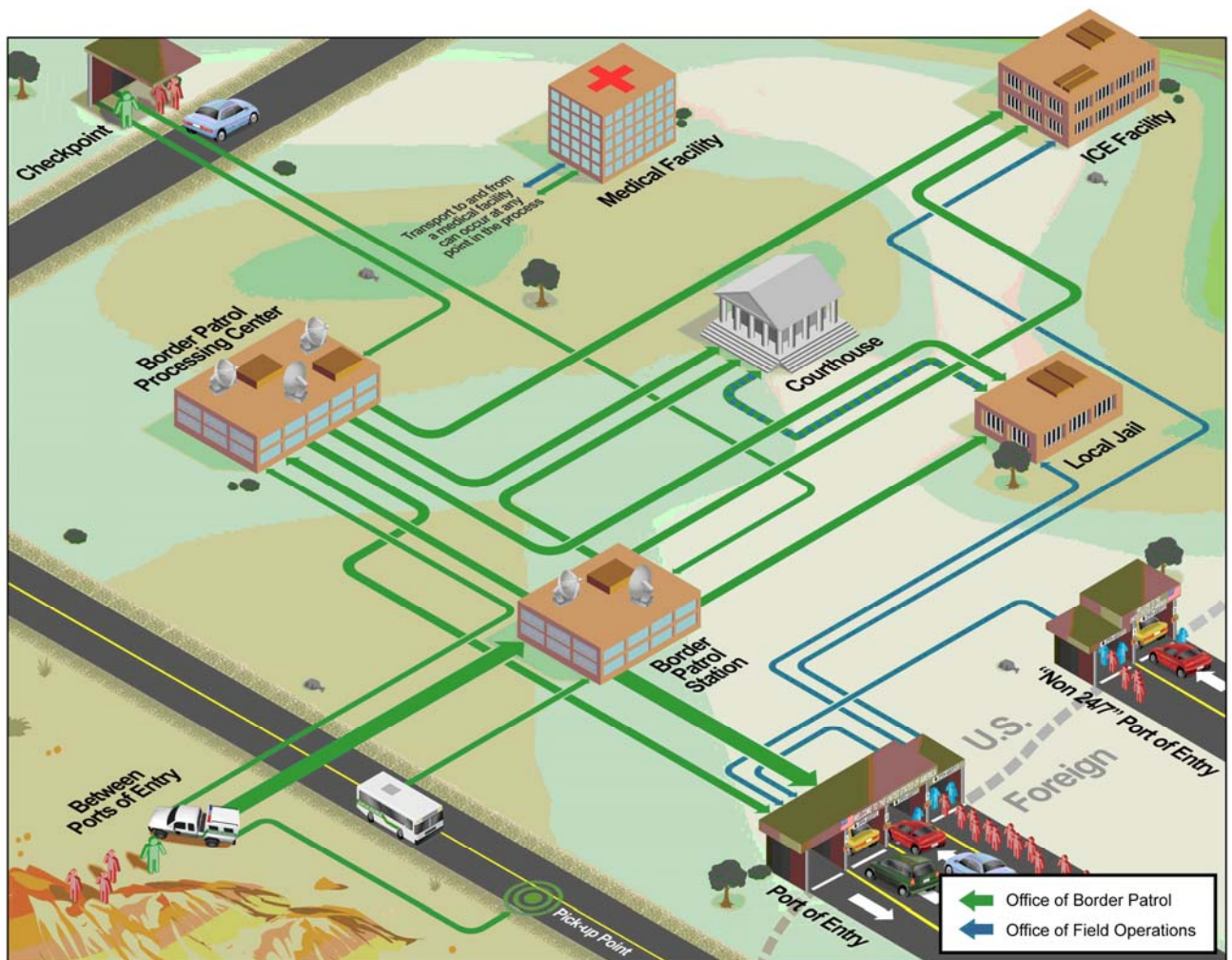
With regard to the classification of the draft report, CBP has not identified any information within this report that warrants a "For Official Use Only" classification.

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 Ms. Lynn Richardson, CBP Audit Liaison, Office of Internal Affairs, at (202) 344-2953.

Appendix C

Detainee Transportation Process



Field to Border Patrol Station: Transportations usually conducted by Border Patrol agents from locations between the ports of entry near the border or from checkpoints established on known egress routes.

Port of Entry or Border Patrol Station to Detention and Removal Facilities: Transportation conducted by CBP officers and agents after the detainee has been processed and a final disposition of the detainee has been determined

Port of Entry or Border Patrol Station to Other: Transportations conducted by CBP officers and agents after the detainee has been apprehended at a port of entry or transported to a Border Patrol station, but before the detainee has been processed or a final disposition of the detainee has been determined.

Appendix D

Major Contributors to This Report

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Christine Haynes, Audit Manager
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