



U.S. DEPARTMENT OF HOMELAND SECURITY **OFFICE OF INSPECTOR GENERAL**

OIG-24-58

September 24, 2024

FINAL REPORT

CBP Needs to Improve Its Management of the Facility Condition Assessment Program





OFFICE OF INSPECTOR GENERAL

U.S. Department of Homeland Security

Washington, DC 20528 | www.oig.dhs.gov

September 24, 2024

MEMORANDUM FOR: Troy A. Miller
Senior Official Performing the Duties of the Commissioner
U.S. Customs and Border Protection

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

GLENN
E SKLAR

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GLENN E SKLAR
Date: 2024.09.24
16:54:49 -0400

for

SUBJECT: *CBP Needs to Improve Its Management of the Facility Condition Assessment Program*

Attached for your action is our final report, *CBP Needs to Improve Its Management of the Facility Condition Assessment Program*. We incorporated the formal comments provided by your office.

The report contains three recommendations aimed at improving CBP's management of its facility condition assessment program. Your office concurred with all three recommendations. Based on information provided in your response to the draft report, we consider recommendations 1 through 3 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions.

Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov. 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 contact me with any questions, or your staff may contact Kristen Bernard, Deputy Inspector General, Office of Audits, at (202) 981-6000.

Attachment



DHS OIG HIGHLIGHTS

CBP Needs to Improve Its Management of the Facility Condition Assessment Program

September 24, 2024

Why We Did This Audit

CBP protects our borders while also facilitating the flow of legitimate trade and travel. CBP conducts its work at various facilities (both leased and owned) throughout the United States, including ports of entry, border patrol stations and checkpoints, warehouses, administrative offices, and training sites, among others. These facilities must be safe for CBP to effectively carry out its mission. We performed this audit to determine the extent to which CBP conducts and manages assessments of owned and leased facilities for the safe and economical use of its real property.

What We Recommend

We made three recommendations to improve CBP's management of the facility condition assessment program.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at:

DHS-OIG.OfficePublicAffairs@oig.dhs.gov.

What We Found

U.S. Customs and Border Protection (CBP) did not always conduct and manage assessments of owned and leased facilities for the safe and economical use of its real property. Department of Homeland Security policy requires CBP to assess the condition, function, and overall performance of its real property every 3 years. CBP uses assessment information to identify any critical or life safety deficiencies that may need to be addressed. However, during fiscal years 2018 through 2023, CBP did not complete assessments for 63 of 288 (22 percent) facilities. Of the 225 completed assessments, none were performed on a 3-year cycle as required by policy. Additionally, CBP did not always resolve critical or life safety deficiencies identified in its assessments in a timely manner. As of January 2024, 448 of 767 (58 percent) identified critical or life safety deficiencies remained unresolved. Finally, CBP did not ensure data in its real property system of record was accurate and complete.

CBP did not assess the facilities every 3 years as required by DHS policy because CBP's policy did not align with Department guidance. CBP did not always assess facilities and act to resolve identified deficiencies because it did not have a comprehensive policy that specified a process for conducting assessments and reporting and monitoring deficiencies, and clear roles and responsibilities for managing and overseeing the assessment program. Also, CBP did not always have controls to ensure users entered data from the assessments into the system accurately and completely. Without comprehensive policies, clearly defined roles and responsibilities, and controls, critical issues may go unresolved, resulting in deteriorated facilities, higher repair costs, and more extensive renovations or replacements.

CBP Response

CBP concurred with all three recommendations.



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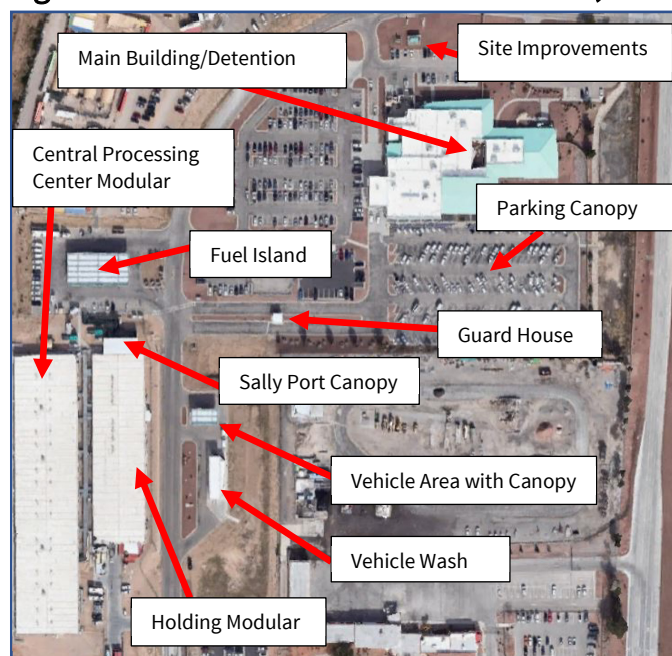
U.S. Department of Homeland Security

Background

U.S. Customs and Border Protection (CBP) plays a pivotal role in carrying out the Department of Homeland Security’s mission by protecting our borders from terrorism, human trafficking, and drug smuggling while simultaneously facilitating the flow of legitimate trade and travel. CBP personnel work in various types of facilities throughout the United States. These facilities, both leased and owned, include land, air, and sea ports of entry (POEs),¹ border patrol stations and checkpoints, warehouses, administrative offices, and training sites, among others. The facilities must be safe for CBP to effectively carry out its mission. CBP occupies a real property² portfolio of more than 8,400 buildings, parcels of land, and structures at 470 sites valued at over \$7.5 billion. In fiscal year 2023, CBP owned about 4,100 assets (49 percent) within its real property portfolio and leased about 2,700 assets (32 percent). CBP occupied the remaining 19 percent through some other form of agreement such as an interagency agreement.

A CBP site can consist of land, buildings, structures, facilities, and utility systems. For example, a border patrol station may include a processing and detention area, fuel island, and guard house, etc. Figure 1 shows an aerial view of a Border Patrol Station in El Paso, Texas, which contains four buildings and six structures.

Figure 1. Border Patrol Station in El Paso, Texas



Source: Border Patrol Station El Paso FCA (dated December 14, 2022)

The DHS Office of the Chief Readiness Support Officer provides Department-wide coordination, policy, and planning for the management of DHS real property. DHS issues directives and policy documents³ to guide component management of real property.⁴ Per DHS policy, in 2018 CBP

¹ Ports of entry are facilities where CBP screens all foreign visitors, returning American citizens, and imported cargo entering the United States.

² Real property is land and improvements to land, buildings, structures, and facilities, including additions and utility systems. Real property also includes equipment affixed and built into the facility as an integral part of the facility (e.g., heating systems), but not moveable items (e.g., portable generators).

³ DHS Directive 119-02, Revision Number 00, *Real Property Management Program*, December 10, 2012; DHS Instruction 119-02-001, *Real Property Manual*, July 2010; and DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.

⁴ Executive Order 13327, February 4, 2004, defines Federal real property as any real property owned, leased, or otherwise managed by the Federal Government.



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established and now maintains a facility condition assessment (FCA)⁵ program. Through the program, CBP is required to assess all facilities it owns, leases, or otherwise uses on a 3-year rotational basis.⁶ An FCA typically discusses, among other things, the age and type of facility, any related building equipment systems, exterior structures, interior/finish systems, site improvements, plumbing, and electrical systems. An FCA also identifies code violations, e.g., instances of noncompliance with the *Americans with Disabilities Act*,⁷ or other fire/life safety problems. CBP certifies annually to the Office of the Chief Readiness Support Officer that it has reviewed and updated information about the condition of its facilities.

On October 5, 2022, CBP issued its *CBP Facility Condition Assessment Plan*, which outlines an approach for conducting FCAs. Appendix C shows CBP's facility assessment phases and key actions. As set forth in Table 1, CBP assigns one of five priority levels to identified real property deficiencies.⁸

Table 1. CBP Real Property Priority Levels for Identified Deficiencies

Priority Level	Description
1 - Critical or Life Safety Deficiency	Critical, has failed or deteriorated or indicated a code violation or safety hazard
2 - Functioning but Require Repair	Poor, functional but deteriorating and will become critical needing repair or replacement
3 - Functioning but Beyond Useful Life	Good, beyond its useful life but functioning
4 - Grandfathered Code and <i>Americans with Disabilities Act</i> ⁹	Grandfathered code and <i>Americans with Disabilities Act</i> issues that may need attention when renovations occur
5 - U.S. General Services Administration Responsibilities ¹⁰	All deficiencies where General Services Administration is responsible for repairs as part of the building shell

Source: *TRIRIGA Facility Condition Assessments Training Manual* and FCA Contract Statement of Work

⁵ An FCA is a comprehensive assessment conducted during one site visit of the entire building (or buildings), attached grounds, and operational support systems. FCAs play a crucial role in enabling CBP to understand the functionality, safety, and longevity of facilities while also supporting effective decision making and resource allocation.

⁶ Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.

⁷ *Americans with Disabilities Act of 1990*, 42 United States Code § 12101 et seq. (*Americans with Disabilities Act* website: <https://www.ada.gov/pubs/adastatute08.htm>, downloaded June 23, 2024.)

⁸ Deficiencies are needs, repairs, or renewals necessary to bring the facility back to working order or to restore its original condition or design.

⁹ A grandfathered code issue and *Americans with Disabilities Act* code issue is one that existed before the application of the current zoning or building code.

¹⁰ For most facilities not owned by CBP, the U.S. General Services Administration either owns or leases that facility on behalf of CBP.



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By definition, a priority level 1 deficiency is the most serious. Deficiencies that affect occupant safety during a fire¹¹ or other emergency, or violations of Occupational Safety and Health Administration (OSHA) standards¹² fall into this category. Figure 2 includes examples of critical or life safety deficiencies such as a roof hatch without a safety guardrail, a handrail broken from the mount, and a damaged restroom subfloor.

Figure 2. Critical or Life Safety Deficiencies



Source: CBP's FCA reports

CBP's Office of Facilities and Asset Management (OFAM) manages the portfolio of owned and leased real property and oversees the assessment process. OFAM hires contractors to assess the condition, function, and overall performance of CBP facilities. OFAM and its contractors record the results from their assessments into a centralized real property system of record called TRIRIGA (not an acronym). OFAM coordinates with CBP subcomponents through its three program management offices: 1) Border Patrol and Air and Marine; 2) Field Operations Facilities; and 3) Mission Support Facilities. Each OFAM program office evaluates emerging mission needs and elevates critical issues and gaps to the attention of senior leadership.

In August 2023, we identified weaknesses in CBP's controls over managing the safety of its international mail facilities.¹³ We determined that CBP did not promptly resolve critical and life safety deficiencies and maintenance issues at six facilities, among other issues. This happened because OFAM did not prioritize resolving and monitoring issues that may have jeopardized

¹¹ The National Fire Protection Life Safety Code provides a minimum level of safety by addressing building construction, protection, and occupancy features that minimize the dangers to life from fire, smoke, and toxic fumes during evacuation. OSHA safety standards are rules that describe the methods employers must follow to limit health and safety risks in U.S. workplaces.

¹² OSHA is an agency within the U.S. Department of Labor that sets and enforces standards to ensure worker safety and health. (U.S. Department of Labor, Occupational Safety and Health Administration website: <https://www.osha.gov/>, downloaded May 28, 2024.)

¹³ OIG-23-48, *CBP's Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk*, August 31, 2023.



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officer safety. We recommended that OFAM develop and implement a process for escalating and effectively resolving local and regional facility issues. We conducted this audit to determine the extent to which CBP conducts and manages assessments of owned and leased facilities for the safe and economical use of its real property.

Results of Audit

CBP Did Not Always Conduct and Manage Assessments of Owned and Leased Facilities for Safe and Economical Use

We reviewed assessments of 288 facilities throughout the United States that CBP conducted from FY 2018 through FY 2023.¹⁴ We found that CBP did not complete an FCA for 63 of these 288 facilities, or 22 percent.¹⁵ Of the 225 completed FCAs, none were performed on a 3-year cycle as required by DHS policy.

CBP did not assess the facilities every 3 years as required by DHS policy because CBP's policy did not align with Department guidance or establish clear roles and responsibilities for managing and overseeing the assessment program. Instead, CBP followed its own *Facility Condition Assessment Plan*, which outlines a general approach for conducting FCAs at CBP facilities on a 5-year cycle. A CBP official said that conducting FCAs every 5 years versus every 3 years makes more sense because most of the deficiencies identified in FCAs are repeat findings. Moreover, CBP officials stated they also chose to conduct assessments on a 5-year cycle because of funding and resource constraints.

CBP Did Not Always Resolve Critical or Life Safety Deficiencies

DHS requires components to prioritize, budget, and schedule when to complete needed repairs.¹⁶ To estimate the total costs of deferred maintenance,¹⁷ CBP assigns a priority level to each deficiency identified in an FCA. DHS requires repairs to be completed within specified timeframes: short (1 to 2 years), medium (3 to 5 years) or long (more than 5 years).¹⁸

¹⁴ CBP conducted 340 assessments from FY 2018 through FY 2023. We only reviewed assessment dates of properties that CBP was responsible for maintaining. We did not review assessment dates of the 115 facilities that CBP leases that are managed by the U.S. General Services Administration and other leaseholders.

¹⁵ On September 27, 2023, DHS updated its real property facility condition standard, Instruction 119-02-004-01, Revision 00, which includes an assessment schedule from 2 to 5 years for real property assets depending on mission dependency and criticality. We measured our results against the 3-year requirement because none of the assessments we reviewed were conducted on or after September 27, 2023.

¹⁶ DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.

¹⁷ Deferred maintenance includes preventive maintenance; replacement of parts, systems, or components; and other activities needed to be performed immediately to preserve, restore, or maintain a real property asset in an acceptable condition.

¹⁸ DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.



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We found CBP did not always resolve identified critical or life safety deficiencies in a timely manner. CBP conducted assessments on 339¹⁹ CBP-owned and leased properties from FY 2018 through FY 2023 and identified 767 critical or life safety deficiencies. As of January 2024, 448 (58 percent) of 767 identified critical or life safety deficiencies remained unresolved. CBP listed the 448 unresolved deficiencies in TRIRIGA as “deferred,” meaning CBP did not correct the deficiency in the current FY and delayed resolving the deficiency until an unspecified future FY. These 448 unresolved deficiencies include[d]:

As of January 2024, 448 (58 percent) of the 767 critical or life safety deficiencies remained unresolved.

- 281 code violations, such as fire hazards or problems with alarms, suppression systems, exits, and barriers; and
- 51 “life safety - imminent harm” deficiencies such as defective bulletproof glass around a booth meant to protect CBP officers from incoming bullets.

Table 2 includes other examples of critical or life safety deficiencies that CBP has not resolved.

Table 2. Examples of Unresolved Critical or Life Safety Deficiencies

Critical or Life Safety Deficiency	Location	Assessment Date
Equipment mounted to a plywood board that is not fire resistant	Hidalgo, Texas, Land Port of Entry	May 10, 2021
Booths contain exterior electrical panels that have open circuits	Wildhorse Land Port of Entry, Havre, Montana	June 29, 2020
Fire alarm control panel is showing a trouble alarm and requires a technical investigation	Ysleta Land Port of Entry, El Paso, Texas	January 10, 2023
Fire alarm system displays system trouble and power trouble	Firing Range Fabens, Fabens, Texas	March 14, 2023
Roof hatch is not equipped with a guardrail and self-closing gate to prevent a fall into the opening	Border Patrol Station, Blaine, Washington	October 3, 2022
Electrical panel board is not bonded to the telecommunications main grounding busbar	Hansboro, North Dakota, Land Port of Entry	July 29, 2020

Source: CBP TRIRIGA data

¹⁹ In addition to conducting 224 FCAs for facilities it was required to assess, CBP elected to conduct 115 FCAs for facilities it was not required to assess to share the condition of the facilities with leaseholders (U.S. General Services Administration, U.S. Postal Service, etc.).



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CBP did not resolve these critical or life safety issues because it did not have a component-wide process for identifying, prioritizing, and resolving FCA deficiencies. According to CBP officials, CBP resolves deficiencies based on priority levels regardless of whether the deficiency is FCA-identified. Further, CBP allowed field office personnel to report and resolve repair needs outside the FCA process. According to CBP personnel, they could not always resolve FCA-identified deficiencies first because they sometimes applied funding to unforeseen emergency repairs generated from field office requests. In addition, CBP officials said that some deficiencies were miscategorized as critical or life safety issues. For example, a CBP official said resurfacing a floor should not be categorized as a critical or life safety issue because it does not pose a threat to life or safety. OFAM officials said they recognize the discrepancies and are planning to redefine critical or life safety to distinguish between dangerous issues and less critical issues.

CBP Did Not Ensure Real Property Data Records in TRIRIGA Were Accurate and Complete

The Office of Management and Budget requires agencies to establish and maintain a real property data quality program to ensure data is accurate and complete.²⁰ Although CBP does not have a data quality program, CBP's TRIRIGA manual instructs CBP personnel to compare data such as square footage, deficiencies, and replacement costs from FCA reports to data in TRIRIGA to ensure data in TRIRIGA is accurate.²¹ The manual also instructs CBP personnel to review any discrepancies found and decide which data should be entered in TRIRIGA.

We found TRIRIGA did not always contain accurate and complete data. We compared data records in TRIRIGA to 352 FCA reports and found data had been entered incorrectly from 346 reports, or 98 percent. Specifically, we looked at three data elements: gross area, in-service date, and last assessment date. We found 539 of 1,056 (51 percent) data elements were entered incorrectly into TRIRIGA. See Table 3 for a breakdown of total errors by data element.

²⁰ Office of Management and Budget M-18-21, Appendix A to Office of Management and Budget Circular No. A-123, *Management of Reporting and Data Integrity Risk* (June 6, 2018).

²¹ *TRIRIGA Facility Condition Assessments Training Manual* (March 2023).



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Table 3. TRIRIGA Data Entry Errors from FY 2018 through FY 2023

Data Elements	Entered Correctly	Entered Incorrectly	Unknown*	Total
Gross Area	11	341	0	352
In-Service Date	231	114	7	352
Last FCA Date	268	84	0	352
Total	510	539	7	1,056

*FCAs contained multiple in-service dates, and DHS Office of Inspector General could not determine which date to compare with TRIRIGA records.

Source: DHS OIG analysis of FCA reports and TRIRIGA data

For example, CBP recorded a(n):

- In-service date of 1989 in TRIRIGA for the Van Buren Land Port of Entry in Maine, although the July 12, 2023, assessment report indicated the in-service date for the facility was 2013;
- Gross area of the Antelope Wells Land Port of Entry in New Mexico as 19,458 square feet in TRIRIGA, although the March 29, 2023, assessment indicated a gross area of 7,112 square feet;²² and
- Last FCA date of August 14, 2019, in TRIRIGA for the Willow Creek Land Port of Entry in Havre, Montana, although we found an assessment report for that location dated June 7, 2023.

CBP did not detect these data entry errors because CBP did not designate a person or office responsible for ensuring accurate and complete TRIRIGA data.

Conclusion

By not completing timely FCAs, CBP may not have accurate information about the condition of its facilities, which, in turn, can lead to higher repair costs and more extensive renovations. CBP may also be putting the health and safety of its personnel at risk by not fully addressing critical and life safety deficiencies identified in FCAs. Finally, due to incomplete or inaccurate TRIRIGA data, CBP may be misrepresenting the condition of its real property to the Department, and consequently missing important opportunities to obtain necessary resources for mission success.

²² Gross area is used to calculate the condition index on the property. According to the TRIRIGA Manual, an accurate gross area is essential for TRIRIGA calculations and DHS reporting.



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Recommendations

Recommendation 1: We recommend that CBP's Office of Facilities and Asset Management establish and implement a CBP-wide policy to include designated roles and responsibilities for managing and overseeing the facility condition assessment program.

Recommendation 2: We recommend that CBP's Office of Facilities and Asset Management establish and implement a CBP-wide process for conducting facility condition assessments that aligns with DHS' policy; identifying, prioritizing, and resolving deficiencies identified during facility condition assessments; and reporting and monitoring deficiencies.

Recommendation 3: We recommend that CBP's Office of Facilities and Asset Management implement a quality control process to ensure facility condition assessment data within TRIRIGA is accurate and complete.

Management Comments and OIG Analysis

CBP provided management comments on a draft of this report, which we have included in their entirety in Appendix B. In its response, CBP affirmed its commitment to maturing the management and oversight of its FCA program. We also received technical comments from CBP on the draft report, and we revised the report as appropriate. CBP concurred with all three recommendations, which we consider resolved and open. A summary of CBP's response and our analysis follows.

CBP Response to Recommendation 1: Concur. CBP OFAM established the Integrated Services Division in FY 2023 to centralize FCA management and oversight and subsequently created an FCA Tiger Team in March 2024 to assess current FCA practices. OFAM, through its Integrated Services Division, will conduct a program analysis and develop a comprehensive FCA program, to include identifying the appropriate placement of the program, staffing, and funding needed to meet program goals and objectives. OFAM also plans to publish a CBP-wide policy or similar regulatory document to clarify roles and responsibilities for the FCA program. CBP estimates these actions will be completed by September 30, 2026.

OIG Analysis: These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP provides its CBP-wide policy to include designated roles and responsibilities for managing and overseeing the FCA program.

CBP Response to Recommendation 2: Concur. As noted in its response to Recommendation 1, CBP OFAM established the Integrated Services Division to centralize and enhance FCA management and oversight, including the development of a comprehensive FCA program and a



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process for conducting FCAs. CBP estimates these actions will be completed by September 30, 2026.

OIG Analysis: These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP establishes, implements, and provides its process for conducting FCAs that aligns with DHS' policy.

CBP Response to Recommendation 3: Concur. CBP OFAM will conduct a TRIRIGA data assessment to identify data integrity challenges and implement a comprehensive FCA data quality control plan. The plan will include identifying critical FCA data and internal controls required to sustain FCA-related data integrity and to support effective FCA program management and oversight. CBP estimates these actions will be completed by September 30, 2026.

OIG Analysis: These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP provides its FCA data quality control plan to include internal controls that support data integrity.



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Appendix A: Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Pub. L. No. 107-296) by amendment to the *Inspector General Act of 1978*.

The objective of this audit was to determine the extent to which CBP conducts and manages assessments of owned and leased facilities for safe and economical use of its real property.

To answer our objective, we conducted interviews with officials from the DHS Office of the Chief Readiness Support Officer. We also interviewed officials from CBP's Office of Field Operations and OFAM, including the following OFAM offices:

- Office of Integrated Services
- Business Operations Branch
- U.S. Border Patrol and Air and Marine Program Management Office
- Field Operations Facilities Program Management Office
- Mission Support Facilities Division Program Management Office

We reviewed applicable Federal laws and regulations as well as DHS and CBP policies and guidance related to management of CBP's FCA program. We also reviewed congressional testimony and prior audit reports from DHS OIG and the U.S. Government Accountability Office related to our objective. We analyzed the FCA processes each program management office had in place during our audit scope period.

We judgmentally selected 16 CBP sites to visit in New Mexico and Texas, including land POEs, Border Patrol stations, and CBP air units to observe facilities and speak with CBP personnel involved in the FCA process. We based the site visit selection on a geographic location that had multiple facilities representing the three program management offices. See Table 4 for a list of locations we visited.



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Table 4. Locations Visited by DHS OIG

OFAM Program Management Office	Location	City, State
	Air Unit Deming	Deming, NM
	Deming Border Patrol Station	Deming, NM
	Santa Teresa Border Patrol Station	Santa Teresa, NM
	Border Patrol El Paso Sector Headquarters	El Paso, TX
U.S. Border Patrol and Air and Marine	El Paso Border Patrol Station	El Paso, TX
	Ysleta Border Patrol Station	El Paso, TX
	Firing Range Fabens	El Paso, TX
	Border Patrol Special Operations Group	El Paso, TX
	Fort Hancock Border Patrol Station	El Paso, TX
	Antelope Wells Land Port of Entry	Antelope Wells, NM
	Bridge of the Americas Land Port of Entry	El Paso, TX
Field Operations Facilities	Paso Del Norte Land Port of Entry	El Paso, TX
	Stanton Street Bridge Land Port of Entry	El Paso, TX
	Ysleta Land Port of Entry	El Paso, TX
	Fort Hancock Land Port of Entry	El Paso, TX
Mission Support Facilities Division	Canine Center El Paso	El Paso, TX

Source: DHS OIG

During our site visits, we conducted a walkthrough to observe facility conditions and deficiencies reported in FCAs. We also interviewed CBP officials to understand their roles and responsibilities for managing CBP’s facilities, conducting FCAs, and resolving FCA deficiencies.

To determine the extent to which CBP assessed real property, we reviewed assessments for properties that CBP was responsible for maintaining from FY 2018 through FY 2023 and analyzed the dates of the most recent FCAs. We did not review assessments of facilities that CBP leases and was not responsible for maintaining. To determine to what extent CBP prioritized, reported, and resolved critical and life safety deficiencies for FY 2018 through FY 2023, we reviewed FCA report data in TRIRIGA and determined the deficiencies, their priority level, and their status of completion. To determine whether CBP addressed deficiencies in a timely manner, we analyzed



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the status of deficiencies for FY 2018 through FY 2023, and if deferred, determined how long the deficiencies had been deferred.

To assess the reliability of TRIRIGA data, we interviewed agency officials responsible for collecting, maintaining, and reporting deficiency, deferred maintenance, and repair data; and reviewed documentation on CBP's methods for collecting and reporting the data. We reviewed DHS and CBP policies and procedures as well as the TRIRIGA manual. We observed CBP demonstrations of TRIRIGA queries and reproduced queries to test data accuracy where necessary. CBP provided a data extract from TRIRIGA and gave the audit team read-only access to the system. We reviewed FCAs stored in TRIRIGA for FY 2018 through FY 2023. We traced data from TRIRIGA to FCA reports to determine the accuracy of the data in TRIRIGA for FY 2018 through FY 2023. Although we identified deficiencies in the data that we received from TRIRIGA, as identified in the body of the report, the testing results do not adversely affect our findings, conclusions, and recommendations. We determined that the data was sufficiently reliable for the purposes of our objective.

In planning and performing our audit, we assessed CBP's internal control structure, plans, policies, procedures, and other key controls for assessing its real property. We identified the internal control components and underlying internal control principles significant to the audit objective. Four of the five components were significant, including the control environment, control activities, information and communication, and monitoring. We assessed internal controls surrounding CBP's FCA operations. We identified internal control deficiencies that could adversely affect CBP's ability to accurately assess and report the condition of its facilities, as identified in the body of the report. However, because we limited our review to these internal controls, our work may not have disclosed all internal control deficiencies that may have existed at the time of our audit.

We conducted this audit from July 2023 through June 2024 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401–424, 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 based on our audit objectives.

DHS OIG's Access to DHS Information

During this review, CBP provided timely responses to our requests for information and did not delay or deny access to information we requested.



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Appendix B:
CBP Comments on the Draft Report

1300 Pennsylvania Avenue, NW
Washington, DC 20229



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

BY ELECTRONIC SUBMISSION

September 12, 2024

MEMORANDUM FOR: Joseph V. Cuffari, Ph. D.
Inspector General
Office of Inspector General

FROM: Henry A. Moak, Jr.
Senior Component Accountable Official
U.S. Customs and Border Protection

9/12/2024

X _____
Signed by: HENRY A. MOAK JR

SUBJECT: Management Response to Draft Report: “CBP Needs to Improve
Its Management of the Facility Condition Assessment Program”
(Project No. 23-039-AUD-CBP, DHS)

Thank you for the opportunity to comment on this draft report. The U.S. Customs and Border Protection (CBP) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

CBP leadership is pleased to note OIG’s recognition that CBP protects the nation’s borders while also facilitating the flow of legitimate trade and travel. OIG also noted that CBP conducts its work at various facilities (both leased and owned) throughout the United States, including ports of entry, border patrol stations and checkpoints, warehouses, administrative offices, and training sites, among others.

To support these operations, the CBP Office of Facilities and Asset Management (OFAM) administers CBP’s facility condition assessment (FCA) Program, through which OFAM affirms the condition of CBP facilities, validates deferred maintenance and replacement cost estimates, and identifies outstanding maintenance and repair items, to include critical or life safety deficiencies. CBP remains committed to efforts to mature the management and oversight of CBP’s FCA Program, such as clarifying roles and responsibilities, processes for conducting assessments and reporting/monitoring deficiencies, and implementation of a quality control process.

The draft report contained three recommendations with which CBP concurs. Attached find our detailed response to each recommendation. CBP previously submitted technical



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comments addressing several accuracy, contextual, and other issues under a separate cover for OIG's consideration, as appropriate.

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

Attachment



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**Attachment: Management Response to Recommendations
Contained in OIG 23-039-AUD-CBP, DHS**

OIG recommended that CBP’s OFAM:

Recommendation 1: Establish and implement a CBP-wide policy to include designated roles and responsibilities for managing and overseeing the facility condition assessment program.

Response: Concur. As outlined in CBP’s response to a previous OIG report,¹ CBP OFAM established the Integrated Services (IS) Division in fiscal year 2023 to centralize and enhance FCA management and oversight. To support this effort, OFAM also established an FCA Tiger Team in March 2024 to assess current FCA practices. Comprised of stakeholders across OFAM, the Tiger Team has thus far made significant progress in understanding program challenges and opportunities.

Under OFAM leadership’s direction, the IS Division also plans to secure additional contract support resources to assist with program analysis and the development of a comprehensive FCA Program, to include identifying the appropriate placement of the program, staffing, and funding needed to meet program goals and objectives. The following key milestones are based upon current IS Division staffing and available funding:

Action	Interim Estimated Completion Date (ECD)
Award and onboard new FCA support contract personnel.	March 31, 2025
Fill currently vacant IS Real Property Program Management Office position, which will be responsible for ensuring all subsequent milestones will be met.	June 30, 2025
Complete CBP business partner Roles and Responsibilities (R&R) Service Level Agreement (SLA), which will be leveraged to establish specific FCA R&Rs.	September 30, 2025
Draft CBP-wide FCA R&R policy, or another similar regulatory document.	December 31, 2025

¹ OIG 24-32, “Infrastructure Investment and Jobs Act Funding: CBP Must Improve Processes for Addressing Critical Repairs at CBP-owned Land Ports of Entry,” dated June 17, 2024; <https://www.oig.dhs.gov/sites/default/files/assets/2024-06/OIG-24-32-Jun24.pdf>



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Publish a policy for the CBP-wide FCA R&R program, or similar document, following business partner review and concurrence.	September 30, 2026
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Estimated Completion Date (ECD): September 30, 2026.

Recommendation 2: Establish and implement a CBP-wide process for conducting facility condition assessments that aligns with DHS’ policy; identifying, prioritizing, and resolving deficiencies identified during facility condition assessments; and reporting and monitoring deficiencies.

Response: Concur. As noted above, OFAM established the IS Division to centralize and enhance FCA management and oversight, established a FCA Tiger Team in March 2024 to assess current FCA practices, and established a plan to secure additional contract support resources to assist with program analysis and the development of a comprehensive FCA Program. Other efforts to address this recommendation will include the following:

Action	Interim ECD
Award and onboard new FCA support contract personnel.	March 31, 2025
Conclusion of Tiger Team analysis of FCA Program.	May 30, 2025
Complete CBP business partner R&R SLA, which will be leveraged to establish specific FCA R&Rs.	September 30, 2025
Draft process for conducting FCAs, which will include specific requirements and protocols for unique facility types, such as Land Ports of Entry.	December 31, 2025
Conclude testing and pilot of FCA Program process for conducting FCAs.	May 29, 2026
Publish FCA process for conducting FCAs.	September 30, 2026

ECD: September 30, 2026.

Recommendation 3: Implement a quality control process to ensure facility condition assessment data within TRIRIGA is accurate and complete.

Response: Concur. Leveraging the testing and pilot of a FCA Program process for conducting FCAs, CBP OFAM will implement a comprehensive FCA Data Quality Control Plan, including quality control processes. Specifically, efforts will include the following:



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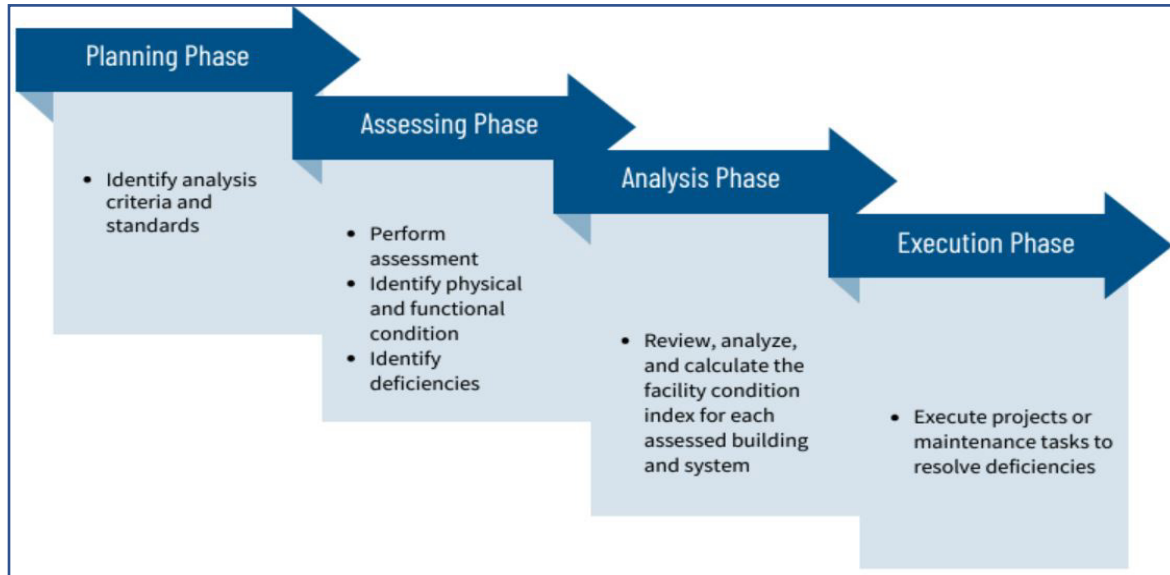
Action	Interim ECD
Draft process for conducting FCAs, which will include specific requirements and protocols for unique facility types, such as Land Ports of Entry.	December 31, 2025
Conclude testing and pilot of FCA Program process for conducting FCAs.	May 29, 2026
Conduct TRIRIGA data assessment to identify data integrity challenges and draft a detailed FCA Data Quality Control Plan, which will include identifying critical FCA data and internal controls required to sustain FCA related data integrity and to support effective FCA program management and oversight	May 29, 2026
Fully implement the FCA Data Quality Control Plan	September 30, 2026

To date, it is also important to note that OFAM identified and submitted seven initial TRIRIGA system changes to support FCA program management and oversight and improve FCA data management. These TRIRIGA system changes will continue to enhance compliance with the Instruction Manual 119-02-004-01.

ECD: September 30, 2026.



Appendix C: CBP Facility Assessment Phases



Source: CBP's TRIRIGA FCA Training Manual (March 2023)



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