Department of Homeland Security
Office of Inspector General

Ensuring the Integrity of CBP's Secure Electronic Network for Travelers Rapid Inspection Program
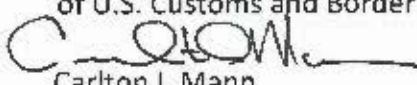
(Redacted)

February 18, 2014

MEMORANDUM FOR: The Honorable Thomas S. Winkowski
Deputy Commissioner
Performing the duties of the Commissioner
of U.S. Customs and Border Protection

FROM: Carlton I. Mann
Chief Operating Officer

SUBJECT: *Ensuring the Integrity of CBP's Secure Electronic Network*
for Travelers Rapid Inspection Program – Redacted

Attached for your information is our final report, *Ensuring the Integrity of CBP's Secure Electronic Network for Travelers Rapid Inspection Program – Redacted*. We incorporated the formal comments from the U.S. Customs and Border Protection in the final report.

The report contains 17 recommendations aimed at improving the Secure Electronic Network for Travelers Rapid Inspection Program. Your office concurred with 16 recommendations, and did not concur with 1 recommendation. Based on information provided in your response, we consider Recommendations 1, 2, 3, 4, 5, 6, 7, 8, 9, 11, 12, 13, 14, 15, and 16 resolved and open. Recommendations 10 and 17 are resolved and closed; no further reporting is necessary for these recommendations.

As prescribed by the *Department of Homeland Security Directive 077-01, Follow-Up and Resolutions for Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) corrective action plan and (2) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendation.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security.

Please call me with any questions, or your staff may contact Deborah L. Outten-Mills, Acting Assistant Inspector General for Inspections, at (202) 254-4015, or Marcia Moxey Hodges, Chief Inspector, at (202) 254-4202.

Attachment

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Appendixes

Abbreviations

AMSCO	Analytical Management Systems Control Office
ATS	Automated Targeting System
CBP	U.S. Customs and Border Protection
CBP-EVS	CBP Enforcement Vetting System
DCL	Dedicated Commuter Lane
DFO	Director of Field Operations
DHS	Department of Homeland Security
DHS TRIP	DHS Traveler Redress Inquiry Program
EC	Enrollment Center
ELMO	Enforcement Link to Mobile Operations
FAST	Free and Secure Trade
FY	Fiscal Year
GES	Global Enrollment System
GOES	Global Online Enrollment System
IA	Internal Affairs
OFO	Office of Field Operations
OIG	Office of Inspector General
POE	Port of Entry
RAW	Risk Assessment Worksheet
RFID	Radio Frequency Identification
SENTRI	Secure Electronic Network for Travelers Rapid Inspection
TTP	Trusted Traveler Programs
VC	Vetting Center
VCM	Vetting Center Module

Executive Summary

U.S. Customs and Border Protection (CBP) implemented the Secure Electronic Network for Travelers Rapid Inspection Program in 1995, as a border management initiative to accelerate the inspection of pre-enrolled low-risk travelers at designated southern land border United States ports of entry. Participants voluntarily provide personally identifiable information to CBP, undergo background checks, and use dedicated lanes that allow CBP to maintain border integrity, security, and law enforcement responsibilities. However, some program members have abused their privileges and transported illicit goods across the border. Smugglers and drug traffickers have also targeted program participants as conduits for illegal cross-border activities. In addition, some CBP officers serving at ports of entry potentially pose an insider threat. As a result, effective internal controls are essential for the program to deter and detect illegal activity.

We assessed Secure Electronic Network for Travelers Rapid Inspection Program to determine: (1) the adequacy of CBP's internal controls to detect and deter smugglers and drug traffickers from using program participants to transport illegal persons, contraband, or drugs; (2) to what extent CBP has established redress procedures for participants who believe they were wrongfully terminated from the program; and (3) to what extent CBP is using and sharing data collected from the program, as well as from the NEXUS, Global Entry, and Free and Secure Trade programs to identify illegal activities and trends associated with these programs.

We have noted significant improvements in CBP's implementation of the Secure Electronic Network for Travelers Rapid Inspection Program. Since our initial review in 2004, CBP has enhanced internal controls processes and established initiatives to address officer integrity issues. However, CBP needs to expand upon these initiatives and address challenges in the program enrollment process. Although CBP has an Ombudsman to review and address redetermination requests, the manual process needs to be enhanced through technology solutions. We made 17 recommendations to assist the program in correcting these deficiencies so it can attain intended program results and outcomes. CBP concurred with 16 recommendations, and did not concur with 1 recommendation.

Background

CBP is responsible for securing the Nation's borders and facilitating lawful international travel and trade, while also enforcing U.S. laws and regulations, including immigration and drug laws. To enhance its ability to accelerate border inspection processing, CBP has established Trusted Traveler Programs (TTPs). TTP membership includes pre-enrolled, low-risk "trusted travelers" arriving in the United States, and allows CBP officers additional time to focus on higher risk, unknown travelers. TTP members receive Radio Frequency Identification (RFID) cards, which can be read at designated ports of entry (POE) locations to verify membership.[1]

Implemented in 1995, the Secure Electronic Network for Travelers Rapid Inspection (SENTRI) Program is one of four CBP TTPs. SENTRI is specific to non-commercial vehicle and pedestrian traveler crossings at southern United States land border POEs, and allows for expedited border crossing through dedicated commuter lanes (DCLs). SENTRI vehicles using the DCLs wait an average of 15 minutes to cross the border, while non-SENTRI vehicles using the regular lanes may wait up to 4 hours.

The other TTPs are Free and Secure Trade (FAST), NEXUS, and Global Entry. The FAST Program was implemented in 2002, and its membership includes pre-screened commercial truck drivers entering the United States from Canada and Mexico. NEXUS, also implemented in 2002, is a bi-national program, which allows pre-screened travelers expedited processing by U.S. and Canadian officials through dedicated lanes at designated northern border POEs, at NEXUS kiosks within selected Canadian airports, and at northern border marine reporting locations. Global Entry was implemented in 2008 and is used at U.S. airports to provide expedited clearance for pre-approved, low-risk travelers upon arrival in the United States.

Applying for CBP Trusted Traveler Program Membership

Individuals seeking TTP membership voluntarily provide personally identifiable information to CBP in return for expedited crossing at designated United States POEs. Appendix D provides the eligibility criteria for each TTP. Applicants apply for TTP membership through the Global Online Enrollment System (GOES), which is CBP's web-based application system used to create user accounts, complete applications, and pay TTP associated fees.

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[1] RFID technology uses radio waves to identify people or objects by using a device to read information contained in a wireless device, from a distance, without making any physical contact.

GOES is also used to notify applicants of decisions regarding their application. These decisions include conditional approvals, notifications to schedule an interview, and application denials.[2] TTP members can also use GOES to submit updated address or license plate information and to request renewals, replacement cards, or add a vehicle. SENTRI is the only TTP to accept both electronic and paper applications. Applicants who submit paper applications and those without email addresses are notified of all decisions regarding their application by mail. After submitting an application an individual receives a PASS ID, which is used by the individual and CBP to track application and membership information. Appendix E contains a flowchart of the enrollment process.

SENTRI Program Management

CBP's Office of Field Operations (OFO) provides centralized management oversight and operational assistance to United States POEs. Within OFO's Office of Admissibility and Passenger Programs, the Executive Director and the program management staff oversee the TTPs. Program management staff performs the following duties in support of the TTPs:

- Develops and implements national policies related to CBP TTPs;
- Provides guidance to field locations on TTP operation;
- Provides operational oversight of all TTPs;
- Plans growth, expansion of current programs, and develops and implements new programs;
- Represents CBP as TTP subject matter experts on internal and external agency projects and working groups; and
- Responds to congressional and industry inquiries related to TTP matters.

Vetting and Adjudicating Trusted Traveler Program Applications

In February 2007, CBP designated its Boston Field Office as the lead to coordinate centralized vetting for the FAST, NEXUS, and SENTRI Programs. With the implementation of Global Entry in 2008, all TTP applications are now vetted at CBP's Vetting Center (VC) in ▮▮▮▮▮▮▮▮ which is in the ▮▮▮▮▮▮▮▮▮▮▮▮ area of responsibility. VC staffing includes ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ and administrative personnel. In addition, ▮▮ CBP officers are temporarily assigned to the VC to assist in vetting applications, while an additional ▮▮ CBP officers vet applications

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[2] Conditional approval is granted to applicants who have been successfully vetted by Vetting Center officers but have not had an in-person interview and biometrics collected at an Enrollment Center.

remotely but are not assigned to the VC. These remote officers are located across the country and perform vetting as a collateral duty.

CBP uses the Global Enrollment System (GES) to consolidate TTP vetting and enrollment processes. GES is an intranet-based secure data system, which stores trusted traveler application and membership information from GOES. The database allows CBP officers to share information across TTPs. CBP officers at the VC use GES to conditionally approve or deny TTP applicant membership.

To begin the vetting process, the VC receives TTP applications in the GES Vetting Center Module (VCM) from GOES. The VCM queries the applicant's name, date of birth, address, vehicle identification numbers, and driver's license information against law enforcement, intelligence, customs, and immigration data systems prior to an officer's review. Appendix F contains a list and description of the databases the VCM may query. In addition, an officer can run additional data system queries when necessary. The VCM creates a Risk Assessment Worksheet (RAW) in GES to record vetting actions and query results for each applicant. The VC officer will then review the RAW to determine whether the applicant has any derogatory information.

Derogatory RAW information does not automatically deny an applicant TTP membership. However, when an applicant has derogatory information, CBP officers must determine its relevance and how it is connected to the applicant. VC officers use the criteria for eligibility and the *Strict Standard Policy* to perform their analysis and make a recommendation about the applicant's request for membership. Appendix G contains CBP's *Strict Standard Policy* for NEXUS, SENTRI, and Global Entry applicants. The VC evaluates FAST applicants based on a ▮▮▮▮▮▮ system, where offenses and violations are assigned a point value, and any applicant with ▮▮▮▮▮ or more is denied membership.

The VC officer must also provide comments, matching database record numbers, or issues requiring additional research into the findings section of the RAW. The officer then recommends denial or conditional approval based on their review and analysis of the RAW. When there are no records or open issues, the file is updated to a conditionally approved status based upon the VC officer's recommendation.

When a VC officer recommends a conditional approval, GES sends the applicant a notification to schedule an interview at an Enrollment Center (EC) within 30 days, and informs the applicant which documents are required for the appointment. However, if the VC officer recommends denying membership, a VC supervisor must review the application and RAW to determine whether denial is appropriate. The VC officers must apply the *Strict Standard Policy* when making a recommendation to deny an applicant.

Beginning in April 2013 VC supervisors can exercise discretion for U.S. applicants that have ███ ██ which would have otherwise been denied, but may be considered low-risk.

VC supervisors record their comments and final determination in the RAW's Reviewer Comments section. This section may contain additional comments or instructions to the EC from a VC supervisor. These comments support or explain the reason for conditional approval or denial. The VC may also include comments with instructions or requests for the EC to gather additional information that was not available during the initial vetting process. Applicants who do not meet eligibility requirements after VC processing will be denied membership. A denial notice is sent to the applicant's GOES account or mailed to those applicants without an email address on file. Denial letters are automatically generated based on codes the VC officers enter into the RAW. CBP's denial codes with corresponding explanations are shown in table 1.

Table 1: TTP Denial Codes and Explanation

Denial Code	Reason Code and Explanation
#1	You are inadmissible into the United States under applicable immigration laws.
#2	You are in violation of Customs laws, regulations, or other related laws.
#3	You have been convicted and/or arrested for a criminal offense.
#4	Information you provided in your application has been found to be false, inaccurate, or incomplete.
#5	CBP Other - you are otherwise ineligible.
#6	You are not a citizen or permanent resident of the United States (applied to Global Entry only).
#7	You are in violation of Canadian laws, regulations, or other related laws (applied to NEXUS only).

Source: CBP's *Consolidated Trusted Traveler Programs Handbook*.

Denial letters also provide applicants with information on how to contact the CBP Ombudsman, when an applicant believes the denial was in error.

Enrolling SENTRI Applicants

TTP applicants who receive conditional approval and notification to schedule an interview make an appointment at a TTP EC. SENTRI applicants can make appointments

at any of the 10 designated SENTRI ECs. The number of officers assigned to the ECs varies. The largest SENTRI EC has ■ officers, while the smallest EC employs ■ officers. Officers are assigned to ECs according to the bid, rotation, and placement procedures in the May 2011 National Collective Bargaining Agreement between CBP and the National Treasury Employees Union. These procedures require, on an annual basis, that each POE must solicit bids and rotate approximately 25 percent of the officers within each work unit. Every September 1, officers bid or request to be assigned to a specific work unit at the POE. CBP management at the POEs reviews the bids in seniority order, and the most senior officer requests will be processed first until 25 percent of the new placements are made within the work units. Table 2 shows the locations that process SENTRI enrollments, the number of assigned officers, and active enrollments as of June 30, 2013.

Table 2: SENTRI Enrollment Centers and Number of Active Enrollments

Enrollment Center	Date Opened			Active Enrollments
Otay Mesa, CA[3]	1995			172,663
El Paso, TX	1997			40,889
Calexico, CA	2005			53,690
Nogales, AZ	2004			16,037
Hidalgo-Pharr-Anzalduas	2010			11,938
Brownsville, TX	2006			8,426
Laredo, TX	2006			26,523
San Luis, AZ	2010			17,392
Douglas, AZ	2013			18
Total		57		347,576

Source: CBP data.

Once an appointment is scheduled, but prior to meeting with the applicant, an EC officer will review the VC RAW comments. The EC officer will follow up on VC comments, which may include contacting another DHS component or other Federal, State, or local agency to clarify whether the RAW information is accurate. Although the VC has conditionally approved the applicant, the EC conducts the interview to ensure that the applicant's low-risk status can be established.

When the applicant arrives at the EC to verify identity, establish low risk, and document the process, the EC officer must:

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[3] The San Ysidro EC opened in 2011 as a spillover satellite center for the Otay Mesa EC. San Ysidro functions under the same EC reporting structure and resource allocation as the center in Otay Mesa.

- Collect biometric data, fingerprints, and photographs;
- Conduct an interview;
- Verify biographical and vehicle information;
- Scan documents into GES;
- Collect the appropriate fees;
- Conduct a vehicle inspection; and
- Brief approved TTP members.

Collecting Biometric Data

SENTRI applicants more than 14 years of age must be fingerprinted, but all applicants are required to be photographed.[4] CBP has an interagency agreement with the Department of Justice's Federal Bureau of Investigation to process fingerprint identification and name checks for TTP applicants.

Conducting the Interview and Verifying Applicant Information

An EC officer must interview all applicants 18 years and older for TTP membership. For applicants less than 18, unless they are emancipated, the officer will review the application with the parent or legal guardian. During the interview, an EC officer must verify the biographical and vehicle data from the GES record. Appendix H shows relevant areas that the EC officer must address in the interview to make a low-risk status determination. During the interview, EC officers should be cognizant of deceptive behavior by the applicant, and are required to ask follow up questions for any responses that fail to address the issues raised during the interview.

When an issue arises during an interview, such as the derogatory information returned on an applicant is inaccurate and requires certified copies of criminal records to verify the applicant was not guilty, the EC allows the applicant 30 days to resolve the issue. An applicant who does not submit the required documentation within 30 days will be deemed ineligible for the program, with GES comments updated to reflect the status.

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[4] Any participant, regardless of age, who seeks to use Global Entry privileges in addition to SENTRI benefits, must be fingerprinted.

Scanning Documents

As of June 2007, CBP does not retain paper files on any TTP applicant or member; all files are electronic. To ensure that CBP has a complete record of the application process, EC officers must scan verified documents into GES. Documents that must be scanned include the following:

- Birth Certificate (if submitted);
- Foreign passports only when required to validate a visa;
- Certified letter of alternative vehicle owner – personal or company owned vehicle (SENTRI only);
- Court dispositions to include rulings of emancipation (if applicable);
- Proof of legal name change (if applicable);
- Legal guardianship/adoption documents;
- Letters of inquiry received from members/applicants on denials and revocations; and
- Foreign vehicle registrations ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮

After the interview, documentation review, and biometrics collection, the EC officer may approve or recommend that the applicant be denied TTP membership. Recommendations for denial must include the officer's reasoning and be reviewed by an EC supervisor. When the EC supervisor has determined that an applicant should be denied participation in a TTP, GES must be updated to indicate the reason(s). The update must include the TECS record number, when applicable, and the name of the supervisor who made the final decision.[5]

Collecting Fees

Once an applicant has been approved, the officer or contract staff at the EC will collect the appropriate fees. As of August 2013, the fee for SENTRI membership was $122.25. Applicants must pay $25 non-refundable application fee at the time of application; however, the remaining $97.25 for fingerprints and DCL system cost fee is collected after the EC interview.[6] When an applicant is denied membership following the EC interview, the EC officer must still charge the $14.50 fingerprint fee. EC officers or contract staff may also collect fees for replacement membership cards or to add or change a vehicle.

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[5] TECS is an information sharing platform that allows users to access different temporary and permanent enforcement, inspection, and operational records relevant to the anti-terrorism and law enforcement mission of CBP and numerous other Federal departments and agencies.

[6] Program fees may also be paid online through GOES. Those applicants who submit payment for all program fees and are denied may be refunded certain fees paid.

Inspecting Vehicles

After enrollment approval, the *Consolidated Trusted Traveler Programs Handbook* requires that all registered SENTRI vehicles receive a ▮▮▮▮ inspection by a CBP officer.[7] The purpose of the ▮▮▮▮ inspection is to examine the areas of the vehicle most often used for smuggling narcotics, other contraband, and persons. CBP chose the target areas for its ▮▮▮▮ inspections based on local research and trend analysis of seizures along the southern United States border. The inspection pattern varies based on the make and model of the vehicle. The ▮▮▮▮ inspection includes the following areas:

▮▮▮▮▮▮▮▮▮▮▮

In addition to the ▮▮▮▮ inspection, the vehicle may also be examined by the Vehicle and Cargo Inspection System, Z Portal, or canine teams, where available.[8],[9] CBP uses specially trained canines for the detection of weapons, contraband, narcotic drugs, abused medication, alcohol, firearms, and explosives. Once the vehicle is inspected, the EC officer places a SENTRI decal on the vehicle's windshield. As of June 27, 2013, the issuance of SENTRI decals has been discontinued.

Briefing Approved Applicants

EC officers must provide approved applicants a briefing of the TTP and procedures specific to the TTP for which they received membership. SENTRI members receive briefing points to include the rules and regulations of the program, as well as instructions for DCL use. Appendix I includes a list of information that EC Officers must

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[7] The *Consolidated Trusted Traveler Programs Handbook* establishes the policies and procedures for all TTPs, including member enrollment and inspection processes at POEs.

[8] The Vehicle and Cargo Inspection System scans cargo containers, trucks and other vehicles in high-volume operations. Its x-ray imaging and radiation scanning help security personnel intercept weapons, nuclear material, and other contraband hidden in containers. It scans entire vehicles, bumper to bumper, and roof to tires, including occupants.

[9] The Z Portal drive-through inspection system is designed to scan large trucks, buses, and cargo containers. It provides photo-like images from the top and sides simultaneously, and quickly highlights organic threats and contraband, such as stowaways, explosives, drugs, and alcohol.

brief to SENTRI members. In addition, before approving final applicant membership, the EC officer must:

- Confirm the applicant understands the program requirements, and confirm the applicant understands that any violation of program and legal requirements for border crossing by the enrollee may be dealt with more severely because of his/her trusted traveler status.
- Advise applicants of measures to be taken in the event they are approached to engage in smuggling activities, including calling the 1-800-BE ALERT or 1-800-232-5378 hotline to report potential smuggling attempts and contacting the local EC.
- Explain potential sanctions for participation in smuggling activities, including:
  - Prosecution to the fullest extent of the law;
  - Revocation of membership in all TTPs; and
  - Possible revocation of TTP membership for all related family members.

Issuing SENTRI Membership Documents

Once SENTRI applicants are approved, GES generates a notification for an RFID card to be mailed to new members. The Government Printing Office produces and mails the RFID cards to a U.S. address within 7 to 10 business days after approval. When an applicant lives in Mexico, the applicant must provide a U.S. mailing address because CBP will not mail the cards to Mexico. The applicant may provide the address of a friend or family member in the United States. CBP will also mail membership cards to a U.S. post office box. After receiving the card, the member must activate it by using the GOES webpage. The member has 30 days to activate the card, or the card will not be usable at border crossing. Members must have activated cards to use the SENTRI DCLs.

24-Hour Enforcement Vetting

Once an applicant is conditionally approved at the VC, CBP ensures trusted traveler continued eligibility by performing daily checks of biographic information against law enforcement information. The CBP-Enforcement Vetting System (CBP-EVS) is a web-based software that permits CBP users to query TECS lookouts and National Crime Information Center wants and warrants.[10] A new CBP user must initiate the request for access to CBP-EVS before the account manager can approve user access. The account manager will review the request and determine whether to authorize system access. In

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[10] The National Crime Information Center is a Federal Bureau of Investigation computerized index of criminal justice information, such as criminal record history information, fugitives, stolen properties, and missing persons.

addition, each user must have an active TECS profile and be National Crime Information Center certified to review the results of these data system queries.

The CBP-EVS automatically submits TECS and National Crime Information Center vetting requests on all trusted travelers in GES every evening. No action is required on the part of the users to submit this request. Every 24 hours, CBP-EVS returns location-specific derogatory information or potential match to a data system record, reports to each EC.

██ As part of the continuous vetting process, CBP officers review the details of all potential derogatory information to determine whether the trusted traveler is actually an exact match to the record. These reviews must be performed in CBP-EVS, which records the identity of the reviewing officer.

Initially, the VC was conducting enforcement vetting for all TTPs except for SENTRI; POEs performed this duty because the VC was unable to handle the workload. CBP's Office of Information Technology has since changed the vetting algorithm and placed a filter in the CBP-EVS to refine derogatory information returns, resulting in a more manageable workload. As of June 3, 2013, the VC also conducts SENTRI enforcement vetting.

CBP officers create a Primary Lookout Override for an individual who is determined not a match to the record. The Primary Lookout Override is important to ensuring members can continue to use the TTPs without unwarranted inconvenience due to false matches to derogatory information. When an officer determines that a member is a match, the member may have his or her TTP benefits revoked. ████████████████████████ ██

When a member's status is revoked, CBP retrieves, deactivates, and mails the RFID card to the Government Printing Office.

Denial and Revocation Redeterminations

In January 2007, CBP established an Ombudsman position to review TTP membership revocations and denials where the applicant claimed the decision was based on incorrect information. CBP created the Ombudsman position because of numerous complaints and inquiries from individuals seeking redetermination. Although CBP regulations do not allow for a formal appeal of the decisions, CBP determined that a process was needed to address such claims and created a process for corrective action where appropriate. The Ombudsman works ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮ ▮▮▮▮▮▮

When applicants or members believe they were denied entry into a TTP or had their membership revoked based on inaccurate information, they may contact an EC to schedule an appointment to speak with a supervisor. When the EC supervisor assesses that the decision may have been based on incomplete information, the supervisor may contact the Ombudsman for a review of the case on behalf of the applicant. ECs also provide denied applicants or revoked members information on how to fax, email message, or write a letter to the Ombudsman directly with supporting information that can demonstrate that the denial or revocation was based on incorrect or inaccurate information.

The Ombudsman will respond, in accordance with CBP policies and procedures, to inquiries from denied or revoked TTP applicants. The Ombudsman, with the concurrence of the ▮▮▮▮▮▮▮▮ has the discretionary authority to approve membership for those who do not meet program eligibility criteria and the *Strict Standard Policy*, when it is determined that the applicant presents a low risk. When the Ombudsman approves TTP membership, ECs may not overturn that decision unless new information is available.

Land Port of Entry Technology

Since 2009, all lanes at southern United States land border POEs have the same technology and the ability to read RFID enabled documents. This technology includes license plate readers, RFID card readers, and Vehicle Primary Client access to the DCL

mode.[11] All CBP officers use the Vehicle Primary Client system at the inspection booth to conduct queries on passengers and vehicles, and to receive alerts regarding enforcement actions. Officers at POEs along the southern border log into the DCL mode only in SENTRI lanes. DCL mode automatically triggers an alert any time that a non-member comes through a SENTRI lane.

Technology standardization at POEs allows port management to open as many SENTRI lanes as the port infrastructure will allow. When the SENTRI border crossing waiting time is more than 15 minutes, management may open another SENTRI lane. In addition, when a reader is damaged, port management may close the lane and open another until repairs are complete.

CBP conducts "primary inspections" to determine whether travelers are compliant with applicable entry rules and regulations. CBP then conducts "secondary inspections" when a CBP officer determines that further inspection processes are necessary to grant a traveler's entry into the United States.

Primary Inspections

When an approved SENTRI member approaches the southern United States land border, traffic signs direct the member to SENTRI DCLs. Because these TTP members are vetted by the same standards and receive RFID cards, it is also possible for a Global Entry or NEXUS member to use SENTRI lanes when the member is in a SENTRI enrolled vehicle. As the driver approaches the primary inspection booth in the DCL, a front license plate reader is activated. As the vehicle passes the front plate reader, a second reader is activated for the rear license plate. Plate readers use optical character recognition to read the plates.

Prior to arriving at the booth, the driver will also pass an RFID reader, as displayed in figure 1. The driver must hold all passengers' RFID-enabled SENTRI cards to the reader. Member data is stored on a CBP data system, not on the SENTRI cards so that a third party cannot access member information should a card be lost or stolen. All of the information from the plate readers and the scanned documents is sent to the CBP officer's Vehicle Primary Client system. The system takes all of the information and displays it on one computer screen so that the CBP officer can see the data.

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[11] The Vehicle Primary Client software application provides CBP officers with a modern, highly productive interface to present traveler data obtained from RFID and license plate readers, and perform queries against secure CBP and other department and agency data systems.

Figure 1: SENTRI Card Reader

Source: CBP.

If the initial RFID reader did not capture all passengers' SENTRI cards, the officer in the primary booth must scan the cards at the reader in the booth or manually enter card information. The CBP officer ensures that the correct license plate and personally identifiable information has been queried in TECS so that the vehicle and passengers can be vetted against the National Crime Information Center and Automated Targeting System (ATS).[12] The members are also vetted against intelligence databases from the Federal Bureau of Investigation, Drug Enforcement Agency, and International Criminal Police Organization. Officers may also see "Be on the Lookouts" from State, county, or other local law enforcement agencies for specific car makes and models. If the officer's Vehicle Primary Client display returns derogatory information against these data systems, ███████████████████████████

Officers operating the DCL may also see alerts to refer members to secondary for compliance examinations and other notices that require officers to conduct vehicle area checks or refer members to secondary inspections.[13] CBP has an automatic system in place to ensure that all SENTRI members are referred to secondary at random border crossing intervals.

The Vehicle Primary Client may also alert the officer of SENTRI card expirations. It is possible for the expiration date on the card to reflect that the card has expired, while

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[12] ATS compares existing information on individuals and cargo entering and exiting the country with patterns identified as requiring additional scrutiny.

[13] Compliance examinations are random selections of vehicles that would ordinarily not be selected for an intensive examination.

the member is still active in the program. ███████████████
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The officer questions the passengers regarding their travel and declarations, as displayed in figure 2. CBP Officers on primary inspection will also look for the vehicle and passenger crossing history. When the officer has any level of suspicion, he or she can perform a quick inspection of the vehicle, or send the vehicle to secondary inspection. When the CBP officer is satisfied that all regulations are met, and no mandatory referral messages are generated in the Vehicle Primary Client, the vehicle is released from primary and allowed to enter the United States.

Figure 2: CBP Primary Lane Inspection

Source: CBP.

Should a non-SENTRI member drive into a SENTRI lane, CBP officers will know because member information will not appear on the DCL mode display. The primary lane officer must refer to secondary any vehicle carrying non-members attempting to pass through the DCL, except in the following cases:

- Emergency vehicles responding to an emergency.
- ██
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- Any person or group who has requested and received prior permission from the Port Director or DFO to use the DCL. The officer will perform a regular (non-trusted traveler) inspection on such travelers. When such permission is granted, the travelers will be informed that planned regular use of the DCL, even while traveling on official duty, will require enrollment in the program.

Secondary Inspections

Secondary inspections allow more time for a thorough inspection than at the primary lane. When a primary lane officer decides to refer someone for secondary inspection, he or she should escort the vehicle, walking alongside it while holding a handheld tire shredder, in case the driver tries to flee. Physical security features to prevent port runners vary by POE, but may include a combination of ████████████████████ ████████████████████████████████████ ████████████████.

The following are to be considered mandatory referrals for secondary inspection:

- Compliance examinations and SENTRI generated random referrals.
- All TECS alerts.
- Members who do not have a valid trusted traveler card in their possession.
- Members using a DCL with unauthorized passengers.
- Compliance blitzes and enforcement operations.
- Participants who fail to declare goods, such as agricultural, merchandise, duty free, and commercial goods.
- Officer generated referrals when suspected TTP or CBP regulations are violated.
- Unauthorized non-SENTRI vehicles.

Referrals from primary DCLs should be given priority in secondary inspection. The CBP officer will obtain a verbal customs declaration, verify the participants' travel documents, and conduct a ██████ inspection of the vehicle. The officer will also conduct law enforcement queries through TECS and other data systems. The CBP officer at secondary inspection may also perform simple questioning or a full inspection relating to issues such as admissibility, customs, baggage, or agricultural, based on the circumstances of the referral.

As a result of a violation confirmed during secondary inspection, officers may confiscate the SENTRI card and forward it to the local EC along with an incident report. The EC supervisor can suspend the member for up to 14 days. ████████████████████ ██ ██████████████ a CBP officer can confiscate the card.

CBP's Efforts To Address Officer Integrity Issues and Insider Threats

To address officer integrity within CBP, the Office of Internal Affairs (IA) has several divisions dedicated to investigating and mitigating misconduct. These include the Integrity Programs Division, the Operational Field Testing Division, the Credibility

Assessment Division, and the Investigative Operations Division. In addition, OFO has established the Analytical Management Systems Control Office (AMSCO) and trained personnel as integrity officers to serve in the field.

The Integrity Programs Division is the research, analysis, and education component of IA. Beginning in 2007, the division was authorized by CBP leadership to expand its capacity to move from a reactive posture, primarily conducting post-case analysis work, to a strategic and proactive stance. Now analysts and behavior research specialists work collaboratively to identify potential acts of corruption and misconduct, identifying potential vulnerabilities in CBP operations, providing research and analytical support to ongoing investigations, and isolating behavior potentially indicative of corruption and misconduct. The division drives the detection, deterrence, and prevention of misconduct and corruption in the CBP workforce through proactive measures in three functional areas: Data and Trend Analysis; Integrity Awareness and Anti-Corruption Training; and Behavioral Research Branch.

The Operational Field Testing Division performs covert testing to identify compliance, vulnerabilities and systemic weaknesses in CBP's multilayered security systems, personnel, technologies, policies, and procedures.

Within the Security Division of CBP IA, the Credibility Assessment Division is responsible for the polygraph pre-employment screening program for CBP law enforcement applicants. In February 2008, the Credibility Assessment Division conducted its first polygraph screening of applicants in Dallas, TX, in collaboration with CBP's Personnel Security Division, several Human Resource Management offices, and Border Patrol. Of the applicants tested, 58 percent failed to complete the polygraph successfully and were confirmed unsuitable for the positions. In January 2011, the *Anti-Border Corruption Act of 2010* mandated conducting pre-employment polygraph screening for all CBP law enforcement applicants by January 2013.[14]

The Investigative Operations Division manages CBP's Joint Intake Center, which serves as the central "clearinghouse" for receiving, processing, and tracking misconduct allegations involving CBP and U.S. Immigration and Customs Enforcement personnel and contractors. All misconduct allegations are coordinated with DHS' Office of Inspector General (OIG), which has the first right to investigate or refer allegations to the appropriate DHS components for investigation, fact-finding, or management action.

The Investigative Operations Division maintains a core staff at IA headquarters in Washington, DC, and a force of approximately 200 special agents assigned to every CBP

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[14] P.L. 111–376, Section 3.

field office nationwide. In fiscal year (FY) 2012, the division processed or monitored 6,823 allegations of misconduct and other reportable incidents involving current or former CBP employees, contractors, civilians, or unknown subjects through the Joint Intake Center.[15] It also documented, investigated, or tracked 339 employee arrests. Of the 339 total arrests, 11 involved corruption or mission-compromising corruption charges.

Additionally, in 2009 OFO established AMSCO after identifying high levels of officer misconduct. When CBP officers involved in misconduct were asked why they did so, they answered, "Because no one was watching." AMSCO proactively monitors officer activity at POEs and equips port management with tools to enhance their oversight capabilities.

Examples of SENTRI Program Insider Threats and Officer Integrity Issues

As previously mentioned, CBP's SENTRI Program accelerates the inspection of pre-enrolled travelers at designated land POEs along the United States southern border. However, some SENTRI members have abused their privileges and transported illicit goods across the border. For example, in January 2012 a SENTRI participant was apprehended at a POE with $1 million in methamphetamines. Also, recently smugglers and drug traffickers have targeted SENTRI participants as conduits for illegal cross-border activities. For example, during 2011 CBP discovered 8 to 10 cases in the El Paso, TX area where SENTRI members had been caught crossing the border with drugs, but unbeknownst to the member, the drugs were placed in or on the vehicle by drug trafficking organizations.

In addition, some CBP officers serving at POEs potentially pose an insider threat. For example, in January 2013 a CBP officer was convicted of allowing a wanted fugitive to enter the United States from Mexico without inspection. While on duty, the CBP officer entered false information about the fugitive's vehicle into a government data system, which allowed ingress through the SENTRI DCL. As evident in this case, effective internal controls are essential for the program to deter and detect illegal activity.

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[15] The Joint Intake Center serves as the central point for receiving, processing, and tracking allegations of misconduct by CBP and U.S. Immigration and Customs Enforcement personnel and contractors.

Results of Review

We have noted significant improvements in CBP's SENTRI Program implementation. Since our initial review in 2004, CBP has enhanced internal controls in SENTRI processes and established initiatives to address officer integrity issues.[16] However, CBP needs to expand upon these initiatives and address challenges in the SENTRI Program enrollment process. Although CBP has an Ombudsman to review and address redetermination requests, the manual process needs to be enhanced through technology solutions.

CBP Has Made Progress in the SENTRI Application, Enrollment, and Inspection Processes

CBP has automated TTP enrollment processing, and all TTPs use the same application, initial vetting, enrollment, and redetermination processes and systems. Prior to 2008, officers could create membership cards at the ECs, but now the Government Printing Office manages the creation and distribution of membership cards. In conjunction with enhanced security features in membership cards, CBP has made technology improvements at the POEs. CBP has eliminated the issuance of SENTRI windshield decals, which enabled criminal organizations to identify trusted travelers to smuggle illegal drugs and contraband. Furthermore, to eliminate inconsistencies in enforcement vetting practices, CBP transitioned the responsibility for all TTPs to the VC.

All Trusted Traveler Programs Operate on the Same Platform Allowing Information To Be Shared Immediately Between Programs

The SENTRI, NEXUS, and FAST Programs pre-date the creation of the Department and were designed and implemented by legacy Immigration and Naturalization Service and U.S. Customs Service. Subsequently, the biographical and biometric data collected from TTP program applicants and members was stored in localized application and enrollment processes, and several stand-alone POE-level data systems. As each program conducted application, enrollment, and background checks in a similar manner, CBP developed a consolidated and more efficient national approach and support structure, and then adopted the GES in 2006. Currently, GES supports all CBP TTPs. For these programs, GES is the sole repository for application, enrollment, and background investigation data.

GES can be accessed from the VC and all ECs, and allows CBP officers to share information across TTPs. Furthermore, CBP's ability to standardize the risk

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[16] OIG-04-14, *A Review of the Secure Electronic Network for Travelers Rapid Inspection Program*.

assessment process through GES reduces the administrative burden on CBP to re-vet applicants, and the need for individuals to provide redundant data for applications to multiple programs.

While GES streamlined the TTP enrollment process, TTP growth outpaced VC and EC resources. CBP enrolled 289,263 new TTP members in FY 2011 and 414,367 new TTP members in FY 2012. The increase in TTP applications resulted in backlogs at all stages of the enrollment process. For example, as of June 30, 2013, 112,125 applications were pending processing at the VC. However, as shown in table 3, only 15 percent are SENTRI applications.

Table 3: Applications Pending Processing as of June 30, 2013

Trusted Traveler Program	Applications Pending Vetting	Percentage of Total
Global Entry	48,256	43%
NEXUS	45,805	41%
SENTRI	17,323	15%
FAST	741	1%
Total	112,125	100%

Source: CBP Program Data.

To address the backlog, CBP authorized officer overtime and extended operating hours at the VC and ECs. Between June 4, 2013, and July 29, 2013, CBP also increased the number of temporary duty officers assigned to the VC.

CBP Improved the Security and Functionality of the SENTRI Membership Cards

When we conducted our SENTRI Program review in 2004, EC officers produced and distributed membership cards to applicants. This presented an opportunity for anyone with EC access to create and provide a SENTRI card without an individual completing the enrollment process. Therefore, to improve security and internal controls over the TTP membership cards, in May 2008 the Government Printing Office began to design, produce, and distribute TTP membership cards on CBP's behalf. CBP encrypts member identity information prior to sending it to the Government Printing Office. The Government Printing Office designed the cards with electronic and printed security features. Embedded technology in the card also helps CBP officers verify the cardholder. Once the Government Printing Office creates a card, it is attached to an insert, combined with a letter to members with activation instructions, and mailed to the recipient.

CBP Has Made Technology Improvements at the Ports of Entry

In implementing the Western Hemisphere Travel Initiative at United States land borders in June 2009, OFO transformed the way CBP conducted business at the POEs.[17] For example, RFID technology, improved license plate readers, and Vehicle Primary Client are now integral to CBP operations and provide additional security measures. According to the February 26, 2013, congressional testimony of CBP officials, in 2005 CBP performed law enforcement queries at land borders for only 5 percent of travelers.[18] Now, CBP has been able to increase the national law enforcement query rate to more than 98 percent of all travelers, allowing officers to make better admissibility determinations and interdict dangerous persons.

OFO's Land Border Integration is responsible for deploying technology and equipment at the POEs. Since 2009, all lanes at the southern United States land border POEs have been equipped with the same technology, including license plate and RFID readers. This enables designated SENTRI POEs to open as many SENTRI DCLs as allowable given port infrastructure. The majority of CBP Officers and supervisors we interviewed responded positively about the technology associated with the SENTRI Program. For example, they said the RFID reader properly reads SENTRI cards more than 90 percent of the time.

However, CBP officers said the license plate readers ███████████████████
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CBP Eliminated the Issuance of SENTRI Windshield Decals, Which Had Enabled Criminal Organizations To Identify SENTRI Authorized Vehicles

During our site visits in April 2013 and May 2013, we observed CBP officers placing a SENTRI windshield decal to vehicles that passed the ████████ inspection. The SENTRI decals were originally intended to identify SENTRI members to CBP officers, but port technology enhancements have rendered the decals obsolete.

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[17] The Western Hemisphere Travel Initiative requires all citizens of the United States, Canada, Mexico, and Bermuda to have a passport or other accepted document that establishes the bearer's identity and nationality to enter or depart the United States from within the Western Hemisphere.

[18] U.S. House Committee on Homeland Security, Subcommittee on Border and Maritime Security hearing, *What Does a Secure Border Look Like?*, February 26, 2013.

Since FY 2010, CBP has spent more than $106,000 on SENTRI decals. CBP officials discussed eliminating SENTRI windshield decals; however, it was not until June 27, 2013, that CBP discontinued SENTRI decal issuance.

The decals allowed smugglers to identify SENTRI authorized vehicles and use members to move drugs and other contraband across the southern border without the members' knowledge. For example, in July 2011 two drug conspirators in El Paso, TX were charged with recruiting people, "spotters," to watch SENTRI lanes to collect information on SENTRI members and vehicles. The spotters collected vehicle make and model information, as well as when and where the vehicles crossed the border. The spotters also followed the vehicles, and when the vehicles were parked, recorded the vehicle identification numbers. According to a Federal indictment, the drug conspirators used the vehicle identification numbers to have keys made so they could place bundles of marijuana in the trunks of the targeted SENTRI vehicles. Unsuspecting drivers would then carry the drugs across the border from Mexico to the United States.

There were several similar cases in the El Paso, TX area where SENTRI members had been caught crossing the border with drugs, but were unknowing victims. At least one of the unsuspecting victims spent 6 months in jail before a U.S. District Judge began to notice similarities in cases. The traffickers usually target students and professionals because they have regular border crossing schedules.

According to a SENTRI program manager, an email message was sent out to SENTRI members explaining that they were responsible for the vehicle and everything in it. Members are encouraged to check their cars before attempting to cross the border to ensure they have not been targeted. Although spotters can still identify SENTRI members by sitting at or near the border and observing passengers, eliminating the use of the SENTRI decal mitigates risk and provides cost savings to the Department.

Moving Enforcement Vetting from the Enrollment Centers to the Vetting Center Reduces Inconsistencies

CBP relies on continuous daily data system checks to verify the low-risk status of TTP members. The *Consolidated Trusted Traveler Programs Handbook* requires that EC personnel review all potential derogatory information records in the CBP-EVS to determine whether the record pertains to a trusted traveler.

The five ECs we visited performed enforcement vetting differently. For example, one EC designated a CBP officer to perform these duties for two local ECs. At the

three other ECs, enforcement vetting was a collateral duty with CBP officers taking turns to complete the task. Two of the three ECs did not always conduct daily enforcement vetting, and CBP officers at one EC said that they may forget to perform the vetting for up to 5 days.

All five ECs verified the biographic information to determine whether a SENTRI member was a match to derogatory information records and annotated the determination in the GES comments. The officers then forwarded matches to the EC supervisor to revoke memberships as appropriate. The level of research conducted on matches, however, varied across the ECs, with ██████████████████ ██ ████████████████████████ Some ECs also performed manual vehicle crossing checks and added ████████████████████████

At two ECs, officers conducting enforcement vetting coordinated with TECS record holders, such as U.S. Immigration and Customs Enforcement, to establish links and provide additional findings based on their research. ██████████ ██ The other EC officers relied on the supervisor to communicate with DHS components and external departments and agencies.

Effective June 3, 2013, enforcement vetting functions for the SENTRI Program transitioned from the ECs to the VC to centralize and standardize vetting across all TTPs. Because VC officers perform enforcement vetting for all other TTPs, the addition of SENTRI has not increased the workload significantly. The VC has designated experienced officers for this function, which provides more consistency.

CBP Has Established Initiatives To Address Officer Integrity Issues, But Improvement Opportunities Remain

CBP has increased its officer integrity initiatives by assigning officers unique identifiers when accessing systems, prohibiting officers from processing family members and close acquaintances, developing lane duty policies, assessing the affect of hometown assignments, conducting covert testing, and performing pre-employment polygraph screening. To deter officer misconduct, CBP has also established AMSCO to detect and address anomalies in officer activity and has publicized officer convictions on an internal CBP website. However, additional improvements can be made in communicating lane schedules, policy enforcement, and officer duty assignments. CBP can also pursue random polygraph screening for current employees and expand covert testing to all TTPs.

CBP Assigns System Users Unique Identifiers

All CBP officers have a unique identifier that must be used to log into CBP data systems, including the VCM, GES, Vehicle Primary Client, and DCL. In addition, all officer logons and actions are annotated in each data system. This allows CBP to query officer activity. The VC supervisors use this function to conduct monthly audits, while AMSCO uses it to identify integrity issues.

CBP Policy Requires Officers To Avoid Interviewing or Inspecting Family Members and Close Acquaintances

According to the March 13, 2012, Directive, *CBP Standards of Conduct, Section 6.2 Prohibited Actions*,

> [E]mployees will avoid any action, whether or not specifically prohibited by these Standards of Conduct, which might result in, or reasonably create the appearance of: using public service for private gain; giving preferential treatment to a private organization or individual in connection with official government duties and/or responsibilities…

As such, CBP officers should not conduct TTP vetting or adjudication of family members or close acquaintances. This applies to both the primary and secondary inspection lanes at a POE and to EC TTP processing.

When a CBP lane officer has a direct relation to someone crossing the border at a POE, the officer must excuse himself or herself from the inspection, get another officer to process the person, and advise a supervisor. However, at one POE, two CBP lane supervisors we interviewed said that they do not have special procedures for referring family members or close acquaintances. In addition, the supervisors said that officers crossing the border are treated as any other member of the public.

EC supervisors should conduct enrollment interviews for CBP officers applying for SENTRI; however, at least one EC supervisor we interviewed did not. Enrollment officers should also refer family members to the supervisors and refer persons they know to other officers for processing. At some smaller ECs, EC officers have processed family members or close acquaintances, but annotated their relationship to the applicants in GES comments. Although there may be no issues of misconduct, these measures are taken to avoid the appearance of possible misconduct.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #1:

Disseminate a memorandum to all Enrollment Center leadership that reiterates the referral process for CBP family members, close acquaintances, and CBP personnel applying for SENTRI membership.

Management Comments and OIG Analysis

We evaluated CBP's written comments and have made changes to the report where we deemed appropriate. A summary of CBP's written response to the report recommendations and our analysis of the response follows each recommendation. A copy of CBP's response, in its entirety, is included as appendix C.

In addition, we received technical comments from CBP and incorporated these comments into the report where appropriate. CBP concurred with 16 recommendations, and did not concur with 1 recommendation in the report. We appreciate CBP's comments and contributions.

Management Response to Recommendation #1: CBP officials concurred with Recommendation 1. In its response, OFO's Trusted Traveler Programs Division said it will issue a memorandum reminding CBP officers that the enrollment interview is the equivalent of a primary inspection by regulation, and as such, the same standards apply to enrollment interviews as to primary and secondary inspections.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 1, which is resolved and open. This recommendation will remain open pending our receipt of the memorandum disseminated to CBP officers regarding the enrollment center referral process.

Limited Use of Personal Communication Devices and Scheduling Inspection Lane Assignments in Real-Time Helps To Mitigate Officer Integrity Issues

CBP officers are not permitted to have personal items, such as cellular phones or any electronic devices, when working primary and secondary inspection lanes.

Personal cellular phones are only permitted in POE buildings. CBP telephones in primary inspection lane booths connect directly to the CBP office and cannot be used to make outside calls.

During fieldwork we learned that scheduling CBP officer lane assignments varies from port to port. At one POE, officers are provided lane assignments ▮▮▮▮ in advance. At two other POEs, lane assignments are provided ▮▮▮▮ in advance, while lane assignments are determined ▮▮▮▮▮▮▮▮▮ at another POE. CBP lane supervisors or team leads generate lane assignment schedules. Each lane assignment is ▮▮▮▮▮▮ but CBP officers may be in a lane for up to ▮ ▮▮ Officers usually rotate from primary to pedestrian, secondary, or exit lanes. At some of the larger POEs, officers may have ▮▮▮▮▮▮▮▮▮▮▮ ▮▮▮▮▮

Regardless of when the lane assignments are provided to officers, CBP's Combined Automated Operations System directs lane shifts ▮▮▮▮▮▮▮▮ which is not reflected in the master assignment schedule for a POE.[19] These shifts are all randomly generated and automated; however, CBP officials managing the system can add additional lane shifts when necessary. While the SENTRI lanes are typically included in the Combined Automated Operations System lane shifts, SENTRI lanes are not always included in the other random lane adjustments or supervisor-directed operations at POEs.

Limiting the use of personal communication devices and scheduling real-time lane assignments helps to mitigate CBP officer integrity issues. For example, in March 2013 a CBP officer was convicted on bribery and smuggling charges for receiving bribes to admit more than 100 undocumented aliens through a POE by providing his on-duty lane assignment information to drivers. Ensuring that officers do not have access to personal cellular phones or electronic devices, while on-duty, is an important integrity measure implemented by CBP. In addition, providing limited advance notice of lane assignments is prudent to mitigate opportunities for officers to communicate their assignments.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

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[19] The Combined Automated Operations System is a CBP web-based software application used to schedule, announce, record, and report enforcement operations, including lane manipulations at land border POEs.

Recommendation #2:

Establish the process of providing minimal advance notification of lane assignments to CBP officers. Additionally, ensure that lane assignments are random so as to not follow a pattern.

Management Comments and OIG Analysis

Management Response to Recommendation #2: CBP officials concurred with Recommendation 2. In its response, OFO said it provided guidance to the field officers in the form of a memorandum directing managers to minimize advance notification of lane assignments to CBP officers. In addition, the guidance said lane assignments should be random.

OIG Analysis: We consider CBP's actions response to the intent of Recommendation 2, which is resolved and open. However, this recommendation will remain open pending our receipt of documentation that the written acknowledgement and completion of actions in the November 2013 Lane Assignment Memorandum have occurred.

CBP Assesses Its Hometown Assignment Policy

In FY 2012, IA's Integrity Programs Division developed and implemented a research and development project focused on the South Texas Campaign area of operations as a method to preempt and disrupt efforts of transnational criminal organizations to infiltrate or compromise CBP's workforce. Focusing on leading threat indicators, CBP developed and implemented the South Texas Campaign to identify and address current and emerging threats along the South Texas border. Through intelligence-sharing, integration of law enforcement resources, and enhanced coordination and cooperation with the Government of Mexico, the South Texas Campaign conducts targeted operations to disrupt and degrade the ability of transnational criminal organizations to operate throughout the South Texas Corridor, while simultaneously facilitating legitimate trade and travel.

A CBP officer's hometown was considered to be within a ▮ mile radius of an assigned duty location. When CBP assigns an officer or agent to his or her hometown, it increases the likelihood of having a connection with family or friends in the area, and may risk and officer or agent placing that connection above the CBP mission when the two intersect. The issue becomes compounded

when family or friends have a criminal history, as IA's research determined that some officers and agents did have criminal associates.

Border Patrol later established a policy that agents could not be assigned to their hometown; however, Integrity Programs Division officials did not know whether any changes were made for CBP officers. At integrity training, CBP officers did express that being assigned to one's hometown could pose a problem. CBP had a policy that prohibited hometown placement, but CBP officials were not able to recall when the policy changed to allow hometown placements.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #3:

Explore the feasibility and value of limiting CBP Officer hometown region assignments to further mitigate the risk of officer or agent misconduct and corruption.

Management Comments and OIG Analysis

Management Response to Recommendation #3: CBP officials concurred with Recommendation 3. In its response OFO's Mission Support Division will explore the operational impacts of limiting CBP officer hometown region assignments, and make recommendations to the Assistant Commissioner for OFO.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 3, which is resolved and open. This recommendation will remain open pending our receipt of the Mission Support Division's recommendations to the Assistant Commissioner for OFO to limit CBP officer hometown region assignments.

CBP Conducts Some Covert Testing, But Additional Testing at SENTRI Ports of Entry Is Needed

The Operational Field Testing Division conducts a variety of covert testing; however, covert testing for the TTPs has only included Global Entry. Division officials are planning SENTRI lane covert testing, and will identify SENTRI POEs and work with field offices to develop operational plans and procedures. The

Division was unable to travel and conduct any covert testing from March 2013 to June 2013 as a result of sequestration, which restricted travel funding.[20]

Operational Field Testing Division officials believe that CBP officer enforcement operations for Global Entry may be less diligent than for other border inspections.

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CBP officers we interviewed said they conduct lane inspections between the non-SENTRI lanes and the DCLs similarly. None of the officers said they are less diligent performing DCL enforcement operations for a trusted traveler lane. However, 37 percent of CBP officers interviewed felt pressure from CBP POE management to move SENTRI vehicles through primary inspection quickly.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Internal Affairs:

Recommendation #4:

Expand covert testing to all CBP Trusted Traveler Programs.

Management Comments and OIG Analysis

Management Response to Recommendation #4: CBP officials concurred with Recommendation 4. In its response, CBP said IA's Operational Field Testing Division has conducted testing in the Global Entry program and plans to expand testing in other TTP areas, to include SENTRI and NEXUS. Additionally the Operational Field Testing Division will explore the feasibility of conducting covert testing in the FAST program.

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[20] The sequestration is a cancellation of budgetary resources. The sequestration implemented in 2013 was a result of the automatic procedures of the *Budget Control Act of 2011* to restrain discretionary and mandatory spending.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 4, which is resolved and open. This recommendation will remain open pending our receipt of covert testing results for the SENTRI Program and covert testing plans for all TTPs.

CBP Conducts Polygraph Screening of Employment Applicants, But Needs To Conduct Random Employee Screening

During FY 2010, CBP conducted a study to compare the rate of the incidents "of record" in its Joint Integrity Case Management System, such as a CBP officer knowingly associating with and providing assistance to drug traffickers, for CBP officers who received a polygraph examination before hire and those who had not. CBP determined that officers were more than twice as likely to be involved in incidents of record when not screened by polygraph.

Prior to implementing polygraph screening for all applicants by January 2013, CBP conducted a study in which it polygraph screened 300 applicants who had successfully completed the CBP hiring process, including a background investigation. Approximately 60 percent failed to complete the polygraph examination successfully, and provided admissions that included undetected felony crimes, serious drug and illegal alien activity, and an attempt to infiltrate CBP on behalf of a drug trafficking organization.

Officials from IA and OFO want recurrent polygraph screening for CBP officers. Several CBP officials indicate it may be necessary for a legislative change and extensive negotiations with the CBP's union to allow CBP to require random polygraph screening. In response to the report, IA is establishing a policy that is currently under review by leadership. Once the policy is approved, CBP will communicate with the union to establish a plan for conducting random polygraph screening of all CBP officers. Further, CBP is developing a proposal requesting legislative authority to administer periodic polygraph exams, focused on corruption, to incumbent law enforcement officers.

Recommendation

We recommend that the Commissioner, U.S. Customs and Border Protection:

Recommendation #5:

Develop and implement a plan with CBP's union to establish a program to conduct random polygraph screening of all CBP officers.

Management Comments and OIG Analysis

Management Response to Recommendation #5: CBP officials concurred with Recommendation 5. In its response, CBP said it is developing a legislative proposal requesting authority to administer periodic polygraph exams, focused on corruption, to incumbent law enforcement officers. CBP is also refining its polygraph policy in response to discussions with the unions.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 5, which is resolved and open. This recommendation will remain open pending our receipt of CBP's legislative proposal and refined polygraph policy.

CBP Established AMSCO To Deter Officer Misconduct

AMSCO receives intelligence and information from other DHS components, such as U.S. Immigration and Customs Enforcement, but most information comes from an analysis of CBP officer activity at POEs. AMSCO has developed algorithms that scan officer activity automatically and can be tailored according to what information is needed. There are more than ▇▇ general algorithms AMSCO can execute to identify CBP officer anomalies.

The "Red Flag" operation, established by AMSCO to detect and address officer misconduct, employs the Enforcement Link to Mobile Operations (ELMO), which is a mobile device that sends a real-time alert to supervisors when an anomaly is present at a POE. ELMO was initially developed as a corruption deterrence tool, but is also used to address CBP officer training gaps. ELMO provides supervisors an integrity snapshot and the ability to train CBP officers immediately when procedures are not followed. There are a number of alerts programmed into ELMO, such as officer to vehicle pairs and manual data system entries.

ELMO was first implemented at California and Arizona POEs along the southern United States land border. AMSCO officials received more than ▮▮▮▮ anomalies per month prior to deployment at Calexico and now receive approximately ▮▮ per month. One AMSCO official said that before ELMO, supervisors were reactive, and now supervisors can be proactive. Overall, AMSCO officials said that ELMO deployment has improved officer adherence to CBP policies and procedures.

Integrity Officers Work with AMSCO and Field Intelligence Units To Assess CBP Officer Misconduct

During our fieldwork, there were 19 OFO integrity officers nationwide. Integrity officers are trained by AMSCO and also serve a 30-day rotation through AMSCO. Although AMSCO does not have oversight of the integrity officers, both groups work together to determine anomalies in CBP officer processing at POEs. OFO's integrity officers travel to POEs to help perform site surveys, present the Red Flag operation, and train staff on ELMO's use. AMSCO produces nightly reports on integrity issues and the office, as well as OFO integrity officers, monitor Red Flag operations and can view POE activity remotely.

Integrity officers brief CBP officers on the requirement to report when they are offered a bribe, see an employee commit a criminal act, or are arrested for a criminal act. Additional duties include conducting post-arrest and post-seizure analysis. For example, when illegal narcotics are seized at an interior CBP checkpoint, integrity officers work with CBP field intelligence units to ▮▮▮▮▮▮▮▮ ▮▮▮▮▮▮▮▮▮▮▮▮ from the time of seizure. Both look to see which POE officer processed the vehicle, at what time, and how often the officer violates policy. Integrity officers also work through CBP field offices to provide IA with operational information needed for their investigations.

Allegations and Investigations of CBP Officers Involved in the SENTRI Program

Our review of CBP IA and DHS OIG Office of Investigations data identified 67 allegations regarding CBP officer misconduct when performing SENTRI Program enrollment and lane inspections from FY 2008 to March 2013 and FY 2008 to

May 2013, respectively.[21] In addition, when vetting CBP employees or employment applicants for SENTRI enrollment during the same period, there were 72 instances when a CBP employee or an employment applicant was determined to have derogatory information, including address links to alleged drug traffickers. Together, this data raises concerns as to whether persons for whom CBP cannot determine low-risk should be employed by CBP or have a role in SENTRI Program processes.

While CBP is developing and implementing multiple programs to combat lane officer corruption and misconduct, we are concerned about EC staff who may access sensitive information, collect program fees, and approve applications without further scrutiny. For example, allegations received by CBP IA and DHS OIG Office of Investigations included more than three instances in which one SENTRI EC was missing collected program fees. In addition, there were more than 20 allegations of EC staff providing SENTRI applicants with sensitive information or using their position to benefit family or close acquaintances in the SENTRI enrollment process. Such actions are prohibited by Section 6.2 of the *CBP Standards of Conduct*, and in certain circumstances are against the law.

As an example, one off-duty EC officer went to the EC to ███████████ ██ Although this officer was suspended and moved to another position, the officer was able to bid for the same EC position the following year and rotated back to the EC. Leadership said in this situation there was nothing it could do because of the officer's eligibility for bid and rotation according to the union collective bargaining agreement.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #6:

Establish and implement a policy to ensure that CBP officers with disciplinary action relating to a Trusted Traveler Program are not involved in adjudicating membership applications or renewals.

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[21] We did not review U.S. Immigration and Customs Enforcement Office of Professional Responsibility records. While this office frequently receives allegations leading to investigations of CBP employees, these allegations would most likely be sent to DHS OIG Office of Investigations first.

Management Comments and OIG Analysis

Management Response to Recommendation #6: CBP officials concurred with Recommendation 6. In its response, CBP said OFO's Trusted Traveler Programs Division will draft field guidance to the Directors of Field Operations and port management, by February 14, 2014, stating that CBP officers with disciplinary actions relating to TTPs are not eligible for rotations through the ECs. The draft will need to be negotiated through the National Treasury Employees Union and, if agreed upon, enforced locally by the port management during the bid and rotation process. CBP officials said that discussions with the National Treasury Employees Union should be concluded before September 30, 2014, in advance of the next bid and rotation cycle.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 6, which is resolved and open. This recommendation will remain open pending our receipt of the approved field guidance that ensures CBP officers, with disciplinary action related to TTPs, are not involved in adjudicating membership applications or renewals.

CBP Publicizes Officer Convictions on Its Internal Webpage

After a CBP employee arrest, IA studies the occurrence, discusses how it could have been prevented, and identifies and disseminates to CBP managers lessons learned to help mitigate recurrence. IA also publicizes CBP employee convictions and other public information about misconduct. IA created a webpage on CBP's intranet called "Trust Betrayed," which posts pictures of employees convicted of using their position to commit crimes and includes a description of the crime and sentencing. Trust Betrayed bulletins are also sent out to CBP managers highlighting the most recent arrests. IA representatives said that this type of outreach and training is used to reduce the number of offenses. CBP officers are required to attend new employee orientation and integrity training, and to complete online annual integrity training.

CBP Needs To Address SENTRI Program Challenges To Enhance Internal Controls

While CBP has made improvements to the SENTRI Program, communication challenges remain across and between ECs, the VC, the Ombudsman, and headquarters. CBP needs to develop EC officer training, ensure SENTRI members

keep information updated, allow for linking family membership applications, enhance payment collection and record keeping procedures, and consider eliminating vehicle inspections during the enrollment interview process.

Greater Transparency Would Enhance Communication Between the Vetting Center, Enrollment Center Officers, and Headquarters

To facilitate separation of duties and effect uniform and consistent TTP vetting, adjudication, and enrollment, CBP limits communication between the VC and ECs. Limited interaction, however, creates a need for greater transparency into operational duties. For example, EC officers were unaware of why the VC was forwarding applicants to ECs that should have been ███████████████ ██████ EC officers said they were processing applications unnecessarily as the VC was not vetting applicants appropriately. ██████████████████████ ███ ███ ██████████████████████████████████████

VC and EC interaction is typically confined to GES comments added by VC officers during application vetting and addressed by EC officers during the adjudication and enrollment process, although it is unclear what monitoring procedures exist to ensure all comments are addressed. Enhancing officer knowledge and increasing transparency between VC and EC operations would facilitate an understanding of respective roles and responsibilities.

VC and EC officers do not interact with headquarters SENTRI Program staff. Supervisors and chiefs are more likely to contact headquarters program staff; however, this communication is limited and conducted on an as-needed basis. Although headquarters SENTRI Program staff said they hold monthly conference calls with ECs, EC leadership explained these calls no longer take place. In addition, headquarters SENTRI program staff has not traveled to SENTRI POEs in more than 4 years. As a result, SENTRI Program staff's ability to develop and enforce policies and procedures effectively is limited without an ongoing and recurrent dialogue with EC leadership.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #7:

Establish and standardize information exchanges between the Vetting Center, Enrollment Centers, and headquarters Trusted Traveler Programs staff to enhance information sharing, coordinate policies and procedures, and increase transparency of respective roles and responsibilities.

Management Comments and OIG Analysis

Management Response to Recommendation #7: CBP officials concurred with Recommendation 7. In its response, CBP said OFO will establish a common electronic location to provide TTP information that can be shared by the VC, headquarters program managers, field managers, and EC officers. The information would include program descriptions, the TTP Handbook, standard operating procedures, current memoranda and musters, training guides, system release updates, etc.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 7, which is resolved and open. This recommendation will remain open pending our receipt of documentation that a TTP information exchange has been established for sharing information between the VC, ECs, headquarters program staff, and field managers.

Uniform Enrollment Center Training Is Necessary To Ensure Processes Are Followed Consistently

The VC has a formal training program for new officers, which includes TTP overviews, application and enrollment processes, the VCM, and vetting standards and queries. It also presents best practices on how to vet an application and guides VC officers step by step through the process. When the VC receives a temporary duty officer, the officer receives the same formal training, and is paired with an experienced officer. The VC training program was developed to ensure consistent vetting among officers permanently, temporarily, and remotely assigned to vet TTP applications.

While the VC has an established training program, ECs have no formal training program and rely on current officers to provide on-the-job training. Of the EC officers and supervisors interviewed, 50 percent said there is no formal training and new EC officers shadow current officers for 1 week to observe and learn the process. However, there is no uniform training to ensure EC officers are

processing applications properly because much of the enrollment determination is subjective, based on an officer's queries performed, and interpretation of information. For example, officer backgrounds, such as previous work as a customs officer at an airport or cargo facility can influence how EC officers evaluate applications.

As assignments are based on seniority, officers may rely on prior experiences, which may not relate to issues unique to southern United States land border POEs. Because new EC officers depend upon current officers as their primary training source, inconsistent processes and practices may be communicated and replicated. Although EC officers have the *Consolidated Trusted Traveler Programs Handbook* and *Strict Standard Policy*, informal training hinders the ability of CBP to ensure that all ECs and EC officers make determinations consistently. One example of potential inconsistencies

Experienced EC officers may also be reassigned from an EC because an officer with more seniority was able to bid and rotate to an EC assignment. EC leadership stated that CBP's bid and rotation policy may increase turnover because officers assigned to an EC one year may opt to bid and rotate to another work unit the following year. The high EC turnover does not provide officers an opportunity to become experts in enrollment processing and limits transferring institutional knowledge from experienced EC officers to new EC officers.

Adequate training is necessary to ensure that enrollment decisions are accurate and based on established guidance, policies, and procedures because officer approvals are not reviewed, while denials must be reviewed by an EC supervisor. An officer's decision regarding approval is final; only 60 percent of ECs visited conduct any second level or peer review of approvals. At ECs, officers' work is not monitored regularly. Therefore, we are concerned that more attention is placed on denials rather than approvals. In addition, on multiple occasions we witnessed EC officers performing each step of the SENTRI enrollment process from biometric collection, document review, interviews, fee collection, to vehicle inspections. Although not all ECs have staffing levels to enforce separation of duties, including peer reviews, uniform training for all EC officers can help ensure each step of the enrollment process is conducted accurately and consistently.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #8:

Develop and implement a uniform training program for Enrollment Center staff that includes Trusted Traveler Programs overviews, policies, interviewing techniques, data system queries, and evaluating results.

Management Comments and OIG Analysis

Management Response to Recommendation #8: CBP officials concurred with Recommendation 8. In its response, CBP said that developing a comprehensive training program will be a long term project. Training will include multiple modules to provide a broad foundation for new CBP officers and established officers. Training can be scaled based on type of port, CBP officer involvement in various TTPs, and whether the training is an introduction, refresher, or for a current CBP officer assigned to an EC.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 8, which is resolved and open. This recommendation will remain open pending our receipt of documentation that a uniform TTP training program has been implemented at the ECs.

Enrollment Centers Need To Ensure that Details of the Vetting, Inspection, and Renewal Process Are Annotated in Global Enrollment System Comments

As SENTRI has not retained paper files since 2007, CBP leadership requires documents to be stored in GES with annotated comments. Providing comments in GES assists with SENTRI Program vetting, inspection, and renewal processes as these processes are conducted by geographically dispersed CBP personnel. However, several CBP officers interviewed said that not all ECs are adding comprehensive comments.

During VC denial reviews, VC supervisors look at VC officer comments and supporting information. When a VC officer's comments are insufficient, there is a return to officer option within the VCM, and VC supervisors can comment that the officer has not substantiated his or her recommendation. This provides VC supervisors with an officer training tool.

When VC officers are unsure about an application, they can send it to a VC supervisor or to an EC with comments. VC officers enter comments in the RAW for EC officers to review and address during an applicant's interview. EC officers

should provide responses to the comments in GES, which acts as a check to ensure that EC officers do not miss steps in the process. For example, VC officers may enter comments in GES regarding a ██████████████████████ ████████████████████ EC officers should request and verify court documents from applicants. This information should be annotated in GES comments to ensure the offense falls within CBP's established discretion threshold.

When an EC determines that an applicant should be denied SENTRI Program membership, the EC officer should add the reason for denial into GES comments. The EC supervisor can then make the final denial determination based on applicant-provided information and EC officer comments from the in-person interview. One EC supervisor said GES comments within applicant records need to be comprehensive because the SENTRI determination process is long and requires considerable research efforts. Comprehensive comments also allow VC officers, other ECs, and the Ombudsman to review the denial reason should an applicant reapply for the SENTRI Program or request redetermination. Useful comments are also an important part of the Ombudsman review process. When looking at a redetermination request, the Ombudsman reviews the applicant's RAW and analyzes all comments from the VC and the ECs. The Ombudsman will also add comments in GES regarding the decision to deny or approve an applicant. These comments are useful for VC and EC officers reviewing previously denied applicants and renewals to identify why the Ombudsman made the determination to deny or approve membership.

Officer comments in GES are also valuable in the primary lane inspection process. Officers conducting enforcement vetting add comments to GES with their research on whether a SENTRI member was a match or not to a derogatory information record, ██████████████████████████████████ This information appears on the primary inspection lane screens and instructs CBP officers what to do when query results identify the SENTRI member as having potential derogatory information.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #9:

Establish and disseminate a policy to ensure that officers enter comprehensive comments into the Global Enrollment System throughout all SENTRI processing stages.

Management Comments and OIG Analysis

Management Response to Recommendation #9: CBP officials concurred with Recommendation 9. In its response, CBP said OFO will issue a memorandum to remind CBP officers to enter comprehensive comments into GES for TTPs.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 9, which is resolved and open. This recommendation will remain open pending our receipt of the memorandum issued to remind CBP officers to enter comprehensive comments into GES.

SENTRI Members Should Notify CBP Timely of Subsequent Changes Since Last Application

According to the SENTRI enrollee contract signed upon program approval, members must keep citizenship and admissibility documents used to enroll in the program current and must keep information, such as immigration status, vehicle plates, address, and employment, up to date. Failure to comply with these requirements can result in immediate revocation of SENTRI lane privileges.

Members may forget to update information in GOES, or as one CBP officer said, members are less likely to change something in the system because GOES is difficult to navigate. In addition, only certain information may be changed in a member's GOES account; all other information changes require the member to come into an EC. For example, members can only update expired documents and addresses in GOES. When members get married and change names or change immigration status, they have to come into an EC and provide the appropriate documentation. While this increases EC workload, documents provided by members must be verified to establish authenticity.

In addition, members may have difficulty traveling to an EC to update information, and may also experience difficulties in obtaining an appointment because of backlog. Three of the ECs we visited said that applicants and members often make appointments based on an EC's schedule rather than its

proximity. Due to the volume of SENTRI applications, appointment availability at ECs may be limited. For example, as of June 30, 2013, the appointment schedule at the largest EC was 83 percent full for the next 90 days. However, leadership at this POE noted this is an improvement as EC appointment backlogs were previously up to 3 to 4 months. Members may go to an EC without an appointment, but walk-ins must wait for the next available EC officer, which may be time-consuming given the number of appointments previously scheduled.

Although member updates are required by the enrollee contract and the *Consolidated Trusted Traveler Programs Handbook*, some CBP officers said that they would use discretion as to whether members should have their privileges revoked. For example, one officer said that he would be more likely to forgive older persons without Internet access and just remind them that it is their responsibility to keep all information up to date.

Because members do not always update their GOES account, CBP may not be aware that a change occurred until a member goes through the renewal process, which occurs every 5 years. As of July 2011, CBP processes automatic renewals for members whose information has not changed in the past 5 years. The VC can adjudicate these renewals without EC involvement. However, there is a risk that members will not update information and be potentially renewed automatically.

Furthermore, the inability of CBP to validate membership data accuracy decreases the effectiveness of enforcement vetting, which relies on exact matches to biographic information, such as names. Outdated member information also hinders the ability of CBP headquarters and field intelligence units to conduct ██████████████████████████████████████ ██ ██████████████████████████

After our fieldwork, CBP officials clarified that the renewal process, although it may appear automatic to the member, is the same process as the initial application. All data is collected and certified as correct by the applicant at the time of submission. Applicants are required to provide any updates at this time. When the application meets specified systems defined parameters, the reviewing officer may approve an applicant for renewal without the applicant visiting an EC.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #10:

Prior to adjudicating automatic renewals, randomly sample members to identify whether pertinent information has changed; then determine whether withholding such information would have precluded membership renewal.

Management Comments and OIG Analysis

Management Response to Recommendation #10: CBP officials concurred with Recommendation 10. In its response, CBP said that all renewal applications go through the same vetting processes as an initial application and are reviewed by a CBP officer at the VC. Every renewal application is still reviewed by the VC officer before a recommended action occurs.

OIG Analysis: After our fieldwork, CBP officials provided additional information that VC officers review every renewal application prior to processing an automatic renewal. Therefore, we consider CBP's actions responsive to the intent of Recommendation 10, which is resolved and closed. No further reporting from CBP regarding this recommendation is necessary.

Global Enrollment System Enhancements Are Needed To Establish Links Between Family Member Records

Because applicants may be denied, or SENTRI membership revoked based on a ▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓▓ it is important for CBP to establish family links and familial relationships. However, GES is not currently configured to generate a family profile and does not allow VC or EC officers to link family members in the system. Each family member has an individual GES record, and as a result, a VC or EC officer may process one record, while another officer may process another family member's record independently. VC officers gave an example of reviewing a minor's SENTRI application but not the legal guardian's application.

To address this issue, CBP officers have adopted a practice of entering relationships and corresponding instructions into GES comments. For the previous example, a VC officer would add in GES comments, "Please ensure legal

guardian is approved first." The officer may also enter a linked individual's PASS ID numbers and ▋▋▋▋▋▋▋▋▋▋▋▋▋▋▋▋▋▋▋ In addition, officers may use these links as a tool to identify issues by checking whether an applicant has family members in the program and their history in the program.

At one EC we visited, contract staff triaging applications manually annotated the relationship information for each record and grouped family member records together for the officers. The officers then added the linking information into GES comments for each applicant. Entering links between family members manually is time consuming and potentially susceptible to human error.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #11:

Modify the Global Enrollment System to allow CBP officers to establish links between family member records under a common profile.

Management Comments and OIG Analysis

Management Response to Recommendation #11: CBP officials concurred with Recommendation 11. In its response, CBP said that OFO will coordinate with the Office of Information Technology to determine the level of effort required to modify GES to allow CBP officers to establish links between family member records, under a common profile.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 11, which is resolved and open. This recommendation will remain open pending our receipt of documentation that GES has been modified to establish links between family member records, under a common profile.

Internal Controls Over SENTRI Fee Payment and Collection Need Improvement

The *Consolidated Trusted Traveler Programs Handbook* includes SENTRI program fees, which can be paid by cash, check, or credit card. The majority of SENTRI application fees are collected online when an application is submitted through GOES, but ECs collect the remaining program fees for vehicles, fingerprints, DCL, etc. However, there are no procedures for linking SENTRI applicant and member

fees paid with fees collected at ECs, or for recording the transactions in GES. The process for collecting SENTRI enrollment and renewal fees also varies at ECs. In addition, Federal Bureau of Investigations fingerprint fees are not always collected as required.

An EC officer said an application can be reconciled with fees collected, but it is difficult because applicants also pay a portion of the fees online through GOES. In addition, GES is not currently configured to link payments to applicants, and cash register receipts are not identifiable by applicant. Some officers opt to make comments in GES regarding fees collected at ECs or scan receipts into GES. Recording payment in GES would assist CBP in ensuring that a fee has been paid and collected appropriately for all SENTRI applicants and members.

When collecting fees, EC personnel use electronic cash registers to enter codes for each fee: fingerprint, vehicle, DCL, replacement decal, replacement card, and miscellaneous. All five ECs we visited use different processes for collecting SENTRI fees. At three ECs, a contractor serves as a cashier and is responsible for collecting TTP applicant payments. Each cashier has an individual cashier code that is printed on the receipt for all transactions they process. Cashiers reconcile the register daily at the beginning and end of each shift. These three ECs maintain a transaction logbook for cash payments, as well as a computerized spreadsheet for fees collected.

At one of these three ECs, the cashier takes processing forms and decals for approved applicants from EC officers and payment from approved applicants. After the applicant pays, the cashier inserts the corner of the processing form into the register for a stamp, which annotates the register, cashier's code, total paid, and time and date. The cashier then signs the processing form and places it with the decal on a clipboard for an EC officer to collect and conduct the ▆▆▆ vehicle inspection.

At the two ECs without contract cashiers, all EC officers use the same cashier login code, which is an ineffective internal control. As a result, when a discrepancy occurs there is no way to determine which EC officer processed the payment. One of these ECs has had three instances of missing SENTRI funds.

At the second EC without a contract cashier, a light duty officer is designated as the cashier.[22] A manager at this EC said when there is no light duty officer

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[22] Light duty officers include those who cannot physically perform their regular duties because of temporary medical situations.

present in the EC, one officer is designated as the cashier. When this occurs there is a potential for the same officer to interview an applicant, inspect a vehicle, and collect applicant fees, and also to collect fees for other EC officers. The manager said he signs off on the cash register daily to ensure it is correct. One EC officer said that when collecting money he prints the applicant's picture to be saved with the corresponding receipt. However, another EC officer writes the fee paid in GES comments but does not scan receipts into GES.

TTP program management officials at CBP headquarters said they do not have a role in reconciling cash payments received at POEs. POEs work with CBP's Revenue Division in Indianapolis, ID to reconcile POE cash registers. The SENTRI and NEXUS fees collected are transmitted electronically into a special account that is used to fund CBP land border activities, while the Global Entry fees are transmitted electronically to CBP's Global Entry Program.

The Federal Bureau of Investigation invoices the TTP program office for fingerprint service fees. According to the *Consolidated Trusted Traveler Programs Handbook*, EC officers should attempt to obtain readable applicant fingerprints up to three times before submitting fingerprints to the Federal Bureau of Investigation for results. TTP program officials and EC supervisors said some EC officers may request fingerprint results multiple times in error, thus charging CBP more service fees than fees collected from applicants. █████████████ ██ As a result, TTP management cannot verify that the service fee invoice amount correctly reflects the number of applicants fingerprinted at ECs.

Recommendations

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #12:

Establish and implement a policy for recording Trusted Traveler Program fees to ensure that the appropriate fees are collected and linked to applicant files in the Global Enrollment System.

Recommendation #13:

Establish and implement a policy to ensure that each officer processing payments at Enrollment Centers has an individual cashier login.

Management Comments and OIG Analysis

Management Response to Recommendation #12: CBP officials concurred with Recommendation 12. In its response, CBP said that modifications to both GES and EC cash register programming may be required to link fees collected at ECs. CBP acknowledged that the changes may prove to be a long term project.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 12, which is resolved and open. This recommendation will remain open pending our receipt of documentation that appropriate fees are collected and linked to applicant files in GES.

Management Response to Recommendation #13: CBP officials concurred with Recommendation 13. In its response, CBP said that OFO will issue a memorandum to the field requiring unique cashier logins for anyone processing fees in an EC.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 13, which is resolved and open. This recommendation will remain open pending our receipt of the memorandum requiring unique cashier logins for anyone processing fees at an EC, and verification that the policy has been implemented.

CBP Should Continue Efforts To Eliminate Enrollment Center Vehicle Inspections

In February 2013, OFO's Admissibility and Passenger Programs proposed to eliminate the ▮▮▮▮▮ vehicle inspection at the time of SENTRI enrollment, and replace it with a random referral during one of the first three member border crossings into the United States. SENTRI applicants would still be required to register their vehicle and include vehicle information on their applications.

Approximately ▮▮ percent of EC officers and supervisors interviewed said they have never identified any anomalies during the ▮▮▮▮▮ inspection, and it is a waste of time. Eliminating the ▮▮▮▮▮ vehicle inspection at ECs would provide officers more time to conduct interviews, which may ease application processing backlogs at some ECs.

SENTRI Program officials said they have started discussions on whether changing the ▮▮▮▮▮ inspection policy would add to SENTRI lane processing times. Before

making changes, CBP officials said they must ensure ████ inspection referrals can be integrated with other secondary referral inspections so that SENTRI members are not referred to secondary inspection at every border crossing.

There are instances when ATS targeting rules are aimed at SENTRI members for referral to secondary inspection. As a result, CBP must review the existing rules in ATS that are designed to signal to CBP officers that further inspection may be warranted. ██ ██ ████████ The rules are tested prior to use to study how they will affect operations and are adjusted constantly and evolve.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #14:

Continue to pursue eliminating the vehicle inspection during the initial SENTRI enrollment interview, and provide the DHS OIG with quarterly updates regarding actions taken until a decision is made.

Management Comments and OIG Analysis

Management Response to Recommendation #14: CBP officials concurred with Recommendation 14. In its response, CBP said that eliminating the vehicle inspection during the initial SENTRI enrollment interview will be a long term project that will require review and logistical coordination at the POEs.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 14, which is resolved and open. This recommendation will remain open pending our receipt of CBP's decision whether to continue vehicle inspections during the enrollment process.

CBP Established a Redetermination Process, But Challenges Remain

CBP has established redetermination procedures for travelers who believe they were denied membership or were wrongfully terminated from the SENTRI Program because of inaccurate information. According to the *Consolidated Trusted Traveler Programs Handbook*, an applicant or member may contact an

EC to schedule an appointment with a supervisor, or contact the CBP Ombudsman directly. However, the CBP redetermination process is manual, clerically driven, inadequately staffed, and offers limited transparency.

Supervisory Interviews May Provide Beneficial Information, But Are Not Always Conducted By Enrollment Centers

During our fieldwork, 60 percent of ECs visited offered supervisory interviews. EC supervisors may hold discussions with applicants who have concerns with their enrollment process, but these supervisors only schedule interviews with applicants who are close to meeting the low-risk traveler criteria. When an interview proves that inaccurate information was used to make a determination, EC supervisors enter comments into GES and forward the information to the EC chief. The EC chief then forwards the information to the Ombudsman for review on behalf of the applicant.

During our fieldwork, we observed an EC supervisory interview with a family seeking redetermination. Prior to the interview, the supervisor analyzed the interviewees' RAWs, conducted additional data system queries on the individuals, and evaluated any questionable information indentified in the RAWs. The supervisor used the information to guide questioning during the interview. Once the interview was complete, the supervisor generated a case write-up consisting of a recommendation for a possible "unset," or reversal, of a SENTRI denial and sent it to the EC chief for review. The supervisor explained that when the EC chief agrees with the recommendation, he or she will send the information to the Ombudsman. Even though an EC can suggest an unset, the final determination is made by the Ombudsman.

The Ombudsman will review notes provided by EC supervisors and chiefs in GES. When no notes exist, the Ombudsman will use the same information the VC generated that led to an initial denial. Denied applicants or revoked members who do not meet with an EC supervisor may email message or write a letter to the Ombudsman directly with supporting information that can demonstrate the denial or revocation was based on incorrect or inaccurate data.

While the *Consolidated Trusted Traveler Programs Handbook* encourages denied applicants or revoked members to contact ECs for a supervisory interview, we determined that not all ECs offer that service. Although not all ECs offer supervisory interviews, ECs provide additional information through in-depth data system queries, which could prove beneficial for the Ombudsman during the

redetermination review process. CBP should evaluate EC ability to conduct these interviews to assist in the redetermination process.

CBP's Redetermination Process Needs Automation, Additional Staff, and Increased Transparency

Although the CBP Ombudsman position was created in 2007, it was vacant until 2008. During this time, a substantial redetermination request backlog developed as no requests had been reviewed or addressed. Also, when the Ombudsman was hired, a process for making redetermination decisions did not exist.

As of July 2013, the redetermination process involves the Ombudsman re-vetting an applicant. The Ombudsman receives approximately 300 requests per week through the U.S. mail. The majority of requests are from applicants, then requests from ECs, headquarters, and Congress, followed by applicant requests sent via email message and fax. Congressional and headquarters requests take precedence over all other requests. Within the last 6 months, the Ombudsman received approximately 7,000 pieces of U.S. mail. The Ombudsman is responsible for reviewing all redetermination requests for all CBP TTPs, and handles the work load with a part-time technician who triages incoming requests.

When a request is received, the technician triages it by logging all U.S. mail and email messages into an Excel™ spreadsheet by the applicant's PASS ID. Once an inquiry is triaged, the Ombudsman logs into GES, reviews the applicant's RAW, and analyzes all comments and notes from the VC and ECs. The Ombudsman re-runs queries for updates and may reach out to ECs for more information when necessary. Based on a review of the data, the Ombudsman will determine whether the applicant was denied or revoked because of inaccurate information.

Once it is determined that an applicant was wrongfully denied or revoked, the Ombudsman will proceed with unsetting, or reversing, the applicant's denial. The Ombudsman sends a list of names to be unset to CBP's Office of Information Technology, because the Ombudsman does not have systems permission to unset applicants within GES. Applicants who are unset receive a "status change" notification in their GOES account and a letter from the Ombudsman detailing the decision.

The Ombudsman may also use discretionary authority to determine an applicant to be low-risk, even though the individual does not meet program eligibility standards. These names are sent weekly to the ████ DFO for review and

approval. Table 4 shows the Ombudsman has processed 24,447 TTP requests for redetermination since FY 2008.

Table 4: Ombudsman Trusted Traveler Program Reconsiderations

Fiscal Year	Total Requests Reviewed	Determinations Reversed	Requests Denied
2008	3,406	1,674	1,732
2009	2,596	1,406	1,190
2010	3,305	1,419	1,886
2011	4,583	2,034	2,549
2012	6,430	2,498	3,932
2013	4,127	2,067	2,060
TOTALS	24,447	11,098	13,349

Source: CBP data as of June 4, 2013.

The Ombudsman maintains three Excel™ spreadsheets for tracking reviewed requests that require processing by another individual or group. One spreadsheet contains a list of unsets to be sent to the Office of Information Technology as previously mentioned, another includes reconsiderations requiring DFO discretionary authority concurrence, and one contains a list of denials sent to the CBP technician for mailing. Once a week, the Ombudsman uses the denial spreadsheet to create form letters for those applicants whose requests have been denied. The technician then prints the letters, then mails the letters to requestors.

The redetermination process is manual and much of the Ombudsman's work is clerical, which reduces available redetermination time. As TTP membership grows, so will the number of redetermination requests. The current process will not sustain the influx of new requests, which will result in an increased backlog and delayed response times. Automating the redetermination process through technology solutions would assist the Ombudsman to sustain TTP growth and provide for more effective and efficient processing.

There is also limited insight into how CBP's redetermination process operates, which is not prudent. The Ombudsman is solely responsible for handling requests. As a result, when the Ombudsman is on leave no requests are processed, which results in an increased backlog. As of July 2013, the redetermination requests backlog was approximately 4,700 for all TTPs. Having individuals in place to continue redetermination operations would mitigate the potential for additional backlog. Furthermore, the Ombudsman should have adequate staffing to assist in handling daily redetermination requests.

Recommendations

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #15:

Provide adequate staffing for the redetermination process to ensure continuity and efficiency of operations.

Recommendation #16:

Automate the CBP redetermination process to enhance the efficiency and effectiveness of operations.

Management Comments and OIG Analysis

Management Response to Recommendation #15: CBP officials concurred with Recommendation 15. In its response, CBP said that OFO will review and evaluate the current workflow to determine the number of staff necessary to augment operations. Assessing staffing levels will be conducted by March 2014.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 15, which is resolved and open. This recommendation will remain open pending our receipt of the staffing assessment results, including the appropriate staffing levels to augment current operations, and verification that additional staff has been hired for the redetermination process.

Management Response to Recommendation #16: CBP officials concurred with Recommendation 16. In its response, CBP said the creation of a new subsystem for the Ombudsman process will require extensive coordination with the Office of Information Technology. CBP plans on holding an initial assessment meeting, within 120 days, to determine the scope and timeline for automating the redetermination process.

OIG Analysis: We consider CBP's actions responsive to the intent of Recommendation 16, which is resolved and open. This recommendation will remain open pending our receipt of documentation that the Ombudsman's redetermination process has been automated.

Opportunities Exist to Reduce Duplication and Improve Transparency in DHS' Redetermination Process

DHS' Traveler Redress Inquiry Program (TRIP) is a single point of contact for individuals who have inquiries or seek resolution regarding difficulties they experienced during their travel screening at transportation hubs. Through DHS TRIP, people who have been denied or delayed airline boarding; have been denied or delayed entry into or exit from the United States at a POE or border crossing; or have been repeatedly referred to secondary screening can file an inquiry to seek redress. Persons seeking redress can apply online to have their inquiry processed through DHS TRIP's Redress Management System. DHS TRIP then forwards the inquiries received to the appropriate screening department or agency. CBP representatives to DHS TRIP do not work with the CBP Ombudsman, but have access to the Redress Management System and GES data to conduct research and gather applicant information. As a result, an opportunity exists to reduce duplication and improve transparency in the DHS redetermination process.

While the CBP Ombudsman's redetermination process is not currently included within DHS TRIP, DHS TRIP receives CBP TTP redetermination inquires. DHS TRIP sends the redetermination inquires to a CBP point of contact for further processing. This point of contact then sends the information to TTP program managers at CBP headquarters. TTP program managers then forward the inquiries to the Ombudsman for final determination, but program managers do not maintain records to ensure that the inquiry was forwarded to the CBP Ombudsman. CBP is also responsible for closing DHS TRIP cases and sending resolution letters to requestors. However, CBP does not send DHS TRIP a resolution to close out the initial inquiry.

DHS TRIP has transitioned to a more automated system since the program's inception; however, paper inquiries are scanned into the Redress Management System. DHS TRIP officials said that prior to moving to a more electronic platform, inquiries were tracked using an Excel™ spreadsheet. DHS TRIP officials said that the Redress Management System is an improvement over the Excel™ spreadsheet because of the transparency it provides to DHS components. In comparison, the CBP Ombudsman's redetermination process does not include scanning paper requests into GES, which limits transparency, and there is no online capability for individuals to request redetermination. In addition, the Ombudsman also does not have access to the Redress Management System. Moving the CBP redetermination intake process to DHS TRIP would eliminate

clerical aspects of the Ombudsman's workload and provide additional time to review redetermination cases.

Recommendation

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #17:

Discontinue direct applicant contact with the CBP Ombudsman, and direct requests to DHS TRIP to file and triage redetermination requests for intake purposes.

Management Comments and OIG Analysis

Management Response to Recommendation #17: CBP officials non-concurred with Recommendation 17. In its response, CBP said that forcing applicants to go through DHS TRIP would only add another step to the process, as all applications would be passed to the Ombudsman eventually. CBP said it can satisfy the intent of Recommendation 17 with additional staff and developing an automated process, which would be achieved by closing out Recommendations 15 and 16.

OIG Analysis: CBP non-concurred with Recommendation 17, but through discussion with CBP officials the intent of this recommendation would be met by completing the actions in response to Recommendations 15 and 16. Therefore, we consider CBP's actions responsive to the intent of the recommendation, and we are closing Recommendation 17. No further reporting from CBP regarding this recommendation is necessary.

Conclusion

CBP has enhanced internal controls in SENTRI Program processes and established initiatives to address officer integrity issues. However, CBP needs to expand upon these initiatives and address additional challenges in the enrollment process. Although CBP established an Ombudsman position to review and address redetermination requests, the manual process needs to be modernized through technology solutions. Addressing these identified deficiencies will enhance the efficiency and effectiveness of the SENTRI Program.

Appendix A
Objectives, Scope, and Methodology

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.

CBP's SENTRI is a border management program that allows CBP to accelerate the inspection of pre-enrolled, low-risk travelers at designated southern United States land POEs. Participants undergo background checks and use DCLs that allow CBP to maintain border integrity, security, and law enforcement responsibilities. SENTRI became operational in 1995; however, in recent years smugglers and drug traffickers have targeted the SENTRI Program as a conduit for illegal cross-border activities.

Our objectives were to determine: (1) the adequacy of CBP's internal controls to detect and deter smugglers and drug traffickers from using SENTRI participants to transport illegal persons, contraband, or drugs; (2) to what extent has CBP established redress procedures for participants who believe they were wrongfully terminated from the SENTRI Program; and (3) to what extent CBP is using and sharing data collected from the SENTRI, NEXUS, Global Entry, and FAST programs to identify illegal activities and trends associated with these programs. We conducted this review as part of our *Fiscal Year 2013 Annual Performance Plan*.

We reviewed SENTRI Program enrollment and inspection processes, including examining directives, policies, and procedures. We also reviewed memoranda of agreement and understanding between CBP, DHS components, and other governmental partners involved in determining the admissibility of TTP participants into the United States.

To assess the adequacy of internal controls within the SENTRI Program, we conducted site visits at the following southern United States land POEs: Otay Mesa, CA; San Ysidro, CA; Calexico, CA; Brownsville, TX; Hidalgo, TX; and Anzalduas, TX.

During site visits, we observed and evaluated SENTRI passenger and vehicle enrollment and inspections. We also interviewed CBP officers at the POEs and U.S. Immigration and Customs Enforcement agents involved in border security investigations. A site visit was also conducted to ████████ to review CBP's initial vetting and redetermination processes for TTPs.

We interviewed CBP officials responsible for managing and implementing the SENTRI Program, and DHS officials who send or receive data through the SENTRI Program to identify illegal activity and perform trend analysis. In addition, we interviewed DHS officials involved in the redetermination process for those participants who believe they were wrongfully denied enrollment in or terminated from the SENTRI Program. We studied work previously performed by our office and held discussions with the Government Accountability Office.

Our fieldwork began in April 2013 and concluded in July 2013. We conducted this review under the authority of the *Inspector General Act of 1978*, as amended, and according to the Quality Standards for Inspections issued by the Council of the Inspectors General on Integrity and Efficiency.

Appendix B
Recommendations

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #1:

Disseminate a memorandum to all Enrollment Center leadership that reiterates the referral process for CBP family members, close acquaintances, and CBP personnel applying for SENTRI membership.

Recommendation #2:

Establish the process of providing minimal advance notification of lane assignments to CBP officers. Additionally, ensure that lane assignments are random so as to not follow a pattern.

Recommendation #3:

Explore the feasibility and value of limiting CBP Officer hometown region assignments to further mitigate the risk of officer or agent misconduct and corruption.

We recommend that the CBP Assistant Commissioner, Office of Internal Affairs:

Recommendation #4:

Expand covert testing to all CBP Trusted Traveler Programs.

We recommend that the Commissioner, U.S. Customs and Border Protection:

Recommendation #5:

Develop and implement a plan with CBP's union to establish a program to conduct random polygraph screening of all CBP officers.

We recommend that the CBP Assistant Commissioner, Office of Field Operations:

Recommendation #6:

Establish and implement a policy to ensure that CBP officers with disciplinary action relating to a Trusted Traveler Program are not involved in adjudicating membership applications or renewals.

Recommendation #7:

Establish and standardize information exchanges between the Vetting Center, Enrollment Centers, and headquarters Trusted Traveler Programs staff to enhance information sharing, coordinate policies and procedures, and increase transparency of respective roles and responsibilities.

Recommendation #8:

Develop and implement a uniform training program for Enrollment Center staff that includes Trusted Traveler Programs overviews, policies, interviewing techniques, data system queries, and evaluating results.

Recommendation #9:

Establish and disseminate a policy to ensure that officers enter comprehensive comments into the Global Enrollment System throughout all SENTRI processing stages.

Recommendation #10:

Prior to adjudicating automatic renewals, randomly sample members to identify whether pertinent information has changed; then determine whether withholding such information would have precluded membership renewal.

Recommendation #11:

Modify the Global Enrollment System to allow CBP officers to establish links between family member records under a common profile.

Recommendation #12:

Establish and implement a policy for recording Trusted Traveler Program fees to ensure that the appropriate fees are collected and linked to applicant files in the Global Enrollment System.

Recommendation #13:

Establish and implement a policy to ensure that each officer processing payments at Enrollment Centers has an individual cashier login.

Recommendation #14:

Continue to pursue eliminating the vehicle inspection during the initial SENTRI enrollment interview, and provide the DHS OIG with quarterly updates regarding actions taken until a decision is made.

Recommendation #15:

Provide adequate staffing for the redetermination process to ensure continuity and efficiency of operations.

Recommendation #16:

Automate the CBP redetermination process to enhance the efficiency and effectiveness of operations.

Recommendation #17:

Discontinue direct applicant contact with the CBP Ombudsman, and direct requests to DHS TRIP to file and triage redetermination requests for intake purposes.

Appendix C
Management Comments to the Draft Report

U.S. Department of Homeland Security
Washington, DC 20229

U.S. Customs and Border Protection

December 11, 2013

MEMORANDUM FOR: Charles. K. Edwards
                    Deputy Inspector General
                    Department of Homeland Security

FROM: Assistant Commissioner, Office of Internal Affairs
                    U.S. Customs and Border Protection

SUBJECT: Response to the Office of Inspector General's Draft Report
                    "Ensuring the Integrity of CBP's Secure Electronic Network for
                    Travelers Rapid Inspection (SENTRI)"

U.S. Customs and Border Protection (CBP) appreciates the opportunity to review and provide comments on your draft report entitled, "Ensuring the Integrity of CBP's Secure Electronic Network for Travelers Rapid Inspection (SENTRI)" (OIG-13-070-ISP-CBP).

We would like to highlight the Office of Inspector General's (OIG) acknowledgement of CBP's significant improvements in the implementation of the SENTRI program since 2004. Specifically, CBP has enhanced internal controls processes and established initiatives to address officer integrity issues.

Based on the OIG's inspection of CBP's SENTRI program, 17 recommendations were issued to CBP. CBP concurs with 16 recommendations and non-concurs with one. Please see below for specific OIG recommendations, as well as, CBP's response and corrective action plans to fully implement your assigned recommendations.

Specifically, OIG recommended that:

Recommendation #1: Disseminate a memorandum to all Enrollment Center leadership that reiterates the referral process for CBP family members, close acquaintances, and CBP personnel applying for SENTRI membership.

CBP Response: Concur. CBP's Office of Field Operations (OFO)/Trusted Traveler Programs (TTP) Division will issue a memorandum reminding CBP officers (CBPOs) that the enrollment

interview is the equivalent of a primary inspection by regulation, and as such, the same standards (CBP Standards of Conduct) apply to enrollment interviews as apply to primary and secondary inspections.

Estimated Completion Date: February 2014

Recommendation #2: Establish the process of providing minimal advance notification of lane assignments to CBP officers. Additionally, ensure that lane assignments are random so as to not follow a pattern.

CBP Response: Concur. OFO provided guidance to the field offices in the form of a memorandum directing managers to minimize advance notification of lane assignments to CBPOs. This guidance stated that lane assignments should be random and not follow a pattern. CBP believes we have met the intent of the recommendation and formally request closure.

Recommendation #3: Explore the feasibility and value of limiting CBP Officer hometown region assignments to further mitigate the risk of officer or agent misconduct and corruption.

CBP Response: Concur. OFO/Mission Support Division will collaborate with the Office of Internal Affairs (IA) and other CBP stakeholders as necessary, to research the statistics on CBPO hiring and initial duty assignments. Upon completion of the research, OFO Mission Support will explore the operational impacts of limiting CBPO hometown region assignments and make recommendations via an issue paper to the Assistant Commissioner for OFO.

Estimated Completion Date: April 2014

Recommendation #4: Expand covert tests of CBP Trusted Traveler Programs.

CBP Response: Concur. IA/Operational Field Testing Division (OFTD) has already conducted covert test in the Global Entry program and plans to expand testing in the other areas of the Trusted Traveler Program to include Secure Electronic Network for Traveler's Rapid Inspection (SENTRI) and Northern Exchange with United States (NEXUS). Additionally, OFTD will explore the feasibility of conducting covert test in the Free and Secure Trade (FAST) program.

Estimated Completion Date: December 2014

Recommendation #5: Develop and implement a plan with CBP's union to establish a program to conduct random polygraph screening of all CBP officers.

CBP Response: Concur. CBP is developing a legislative proposal requesting legislative authority to administer periodic polygraph exams, focused on corruption, to incumbent law enforcement officers. Simultaneously, CBP is refining polygraph policy in response to discussions with the unions.

Estimated Completion Date: September 2014

Recommendation #6: Establish and implement a policy to ensure that CBP officers with disciplinary action relating to a Trusted Traveler Program are not involved in adjudicating membership applications or renewals.

CBP Response: Concur. OFO/TTP will draft field guidance to the Directors of Field Operations and port management stating that CBPOs with disciplinary actions relating to TTP are not eligible for rotations through the Enrollment Centers (ECs) by February 11, 2014. The draft will need to be negotiated through National Treasury Employees Union (NTEU) and, if agreed upon, enforced locally by port management during the bid and rotation process. OFO-TTP will coordinate with the CBP-Office of Human Resources Management-Labor Employee Relations and other offices within OFO with equities in the process. Discussions with NTEU should be concluded prior to September 30, 2014 (in advance of the next Bid and Rotation Cycle).Timeline for issuance of memo will be dependent on NTEU negotiations.

Estimated Completion Date: September 2014

Recommendation #7: Establish and standardize information exchanges between the Vetting Center, Enrollment Centers, and headquarters Trusted Traveler Programs staff to enhance information sharing, coordinate policies and procedures, and increase transparency of respective roles and responsibilities.

CBP Response: Concur. OFO will establish a common location, such as an OFO "SharePoint" page for TTP that provides information for the Vetting Center, Headquarters program managers, field managers and EC officers as a resource. The site could include program descriptions, locations, the Trusted Traveler Programs Handbook, other program SOPs, current memoranda and musters, training guides, system release updates, etc. OFO plans to establish common resources by May 30, 2014. A memorandum will be disseminated to the field within 30 days of establishing location for common resources no later than June 30, 2014.

Estimated Completion Date: June 2014

Recommendation #8: Develop and implement a uniform training program for Enrollment Center staff that includes Trusted Traveler Programs overviews, policies, interviewing techniques, data system queries, and evaluating results.

CBP Response: Concur. Development of a comprehensive training program will be a long term project. Training will include multiple modules to provide a broad foundation for new CBPOs and established officers alike. Training can be scaled based on type of port, involvement of the CBPO in various TTP, and whether the training is an introduction, refresher, or for a current CBPO assigned a TTP function in an EC.

OFO-TTP will coordinate with OFO/Field Programs Division (FPD) and the CBP Office of Training and Development (OTD) to determine equities as well as engage other CBP program offices, as necessary. Initial meetings with OFO/FPD and CBP/OTD to assess scope and approach to training development will be conducted in February 2014. Additional program milestones will be developed following initial meetings.

Estimated Completion Date: September 2014

Recommendation #9: Establish and disseminate a policy to ensure that officers enter comprehensive comments into the Global Enrollment System throughout all SENTRI processing stages.

CBP Response: Concur. OFO/TTP will issue a memorandum to remind CBPOs to enter comprehensive comments into GES for TTP programs.

Estimated Completion Date: February 2014

Recommendation #10: Prior to adjudicating automatic renewals, randomly sample members to identify whether pertinent information has changed; then determine whether withholding such information would have precluded membership renewal.

CBP Response: Concur. Currently, all renewal applications go through the same vetting processes (same as an initial application) and are reviewed by a CBPO at the Vetting Center. If the renewal application meets certain system requirements, the system allows the Vetting Center officer to "approve" the application after review. Every renewal application is still reviewed by the Vetting Center officer before a recommended action occurs.

Since under the current process, all renewal applications are renewed and information provided is compared to information previously provided by an applicant, any change of information is analysis and incorporated into the vetting process by a CBPO. A random sampling is not necessary for this information because this practice already occurs in the standard process for a Renewal Application. CBP believes we have met the intent of the recommendation and formally request closure.

Recommendation #11: Modify the Global Enrollment System to allow CBP officers to establish links between family member records under a common profile.

CBP Response: Concur. OFO/TTP will coordinate with the CBP Office of Information and Technology (OIT) to determine the level of effort (LOE) required for this systems change. An initial meeting to determine LOE, timeline for project and future milestones will be conducted in March 2014. This will be a long term project and may require additional coordination to with other CBP equities.

Estimated Completion Date: June 2014

Recommendation #12: Establish and implement a policy for recording Trusted Traveler Program fees to ensure that the appropriate fees are collected and linked to applicant files in the Global Enrollment System.

CBP Response: Concur. Modification to both GES and cash register programing may be required in order to link fees collected at Enrollment Centers which will prove to be a long term project.

An initial review of the process will occur within 90-120 days to assess the required changes. Once identified, a LOE will be needed from OIT to determine project timelines. OFO/TTP will coordinate with OIT and the CBP Office of Administration (OA). An initial meeting to determine requirements will be conducted in February 2014. Additional timeline/milestones will be developed as needed.

Estimated Completion Date: September 2014

Recommendation #13: Establish and implement a policy to ensure that each officer processing payments at Enrollment Centers has an individual cashier login.

CBP Response: Concur. OFO/TTP will issue a memo to the field requiring unique cashier logins for anyone (contractors, CBPOs, etc.) processing fees in an EC. OFO/TTP will coordinate with OA, OIT, and other offices with equities in this process.

Estimated Completion Date: January 2014

Recommendation #14: Continue to pursue eliminating the vehicle inspection during the SENTRI enrollment process, and provide the DHS OIG with quarterly updates regarding actions taken until a decision is made.

CBP Response: Concur. This is a long term project which involves changes to multiple systems and requires review and logistical coordination at the OFO ports of entry. OFO/TTP will coordinate with OIT and other offices with equities in this project. Our first report will be provided by January 2014.

Estimated Completion Date: September 2014

Recommendation #15: Provide adequate staffing for the redetermination process to ensure continuity and efficiency of operations.

CBP Response: Concur. OFO/TTP will review and evaluate the current work flow to determine the number of staff necessary to augment the current operation. Assessment of staffing levels will be conducted by March 2014.

Estimated Completion Date: June 2014

Recommendation #16: Automate the CBP redetermination process to enhance the efficiency and effectiveness of operations.

CBP Response: Concur. The creation of a new subsystem for the Ombudsman process will require extensive coordination with CBP OIT, capturing systems requirements, business rules, and developing a LOE for the project.

An initial assessment meeting will occur within 90 -120 days to determine the scope of the project and future timelines for development and implementation.

OFO/TTP will coordinate with OIT and Ombudsman's office. An initial meeting will be conducted in March 2014, with project timelines and milestones to follow.

Estimated Completion Date: September 2014

Recommendation #17: Discontinue direct applicant contact with the CBP Ombudsman, and direct requests to DHS TRIP to file and triage redetermination requests for intake purposes.

CBP Response: Non-Concur. DHS Trip serves a broader purpose than the Ombudsman process for TTP. By forcing the applicants to go through DHS Trip as a single conduit, DHS Trip becomes inundated as the triage point, only to have these applications passed on to the Ombudsman. With the addition of staff and development of an automated process for CBP redetermination for TTP process, DHS Trip will become another unnecessary step in the process.

The TTP Ombudsman process is the same across all TTPs--not unique to SENTRI. Current regulations for the Global Entry program provide both the option of DHS Trip or the CBP Ombudsman for redress. At this point, only a limited number of applicants utilize DHSTrip to request reconsideration by the Ombudsman.

CBP is committed to the continual improvement of our SENTRI program, and will work with our internal components and DHS partners to implement the recommendations. If you have any questions regarding this response, please contact me or have a member of your staff contact Ms. Kimberly Jenkins, CBP Audit Liaison, at (202) 325-7712.
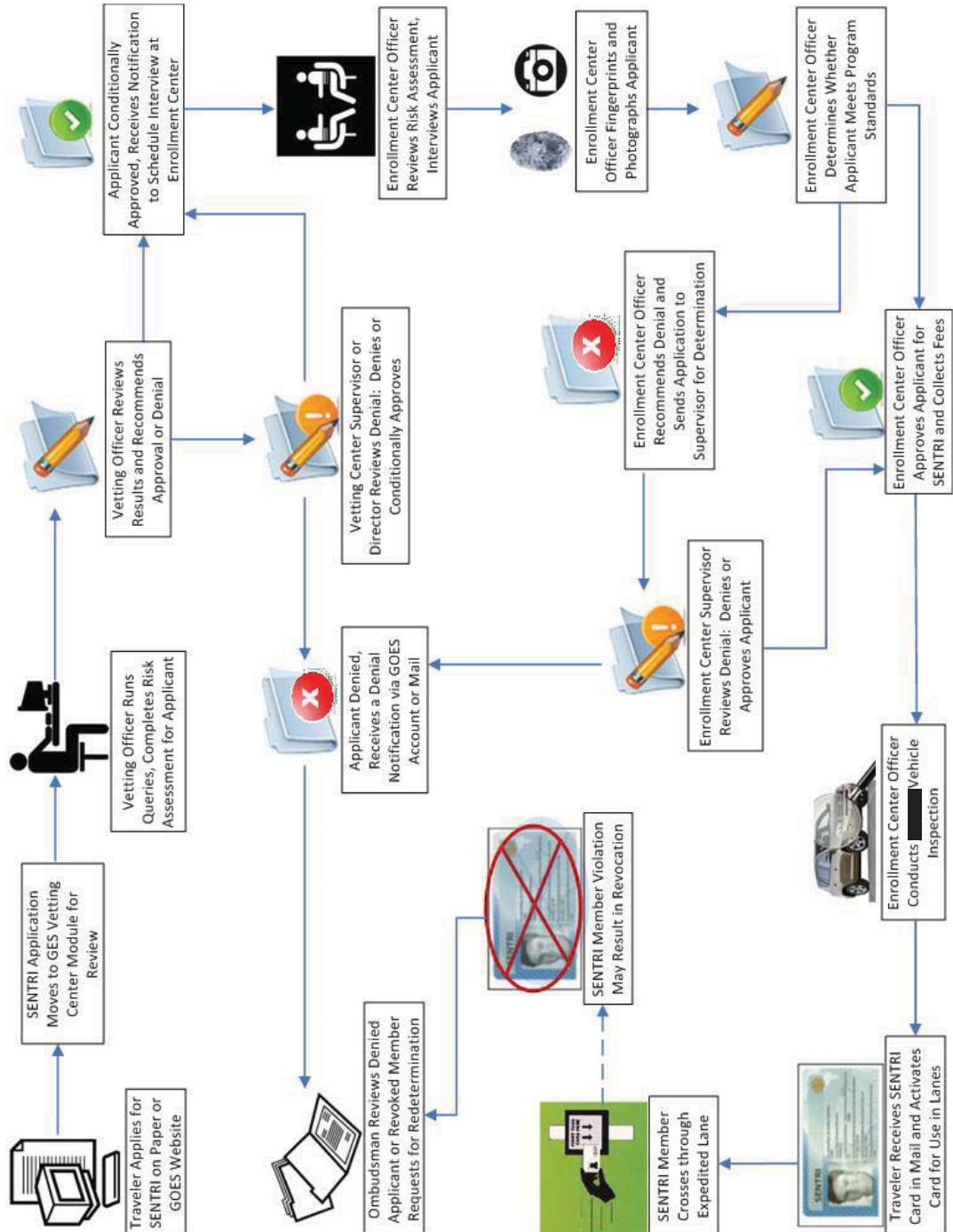
Appendix D
Trusted Traveler Program Eligibility Criteria

Eligibility Criteria	FAST	NEXUS	SENTRI	Global Entry
Citizen of the United States	X	X	X	X
U.S. Lawful Permanent Resident	X	X	X	X
Driving a Commercial Conveyance into Canada	X			
Driving a Commercial Conveyance into the United States	X			
Citizen of Canada	X	X	X	
Landed Immigrants of Canada	X	X		
Citizen of Mexico	X		X	
Resident of Mexico	X		X	
Nationals of Countries Approved through Bi-National Trusted Traveler Programs				X
Admissible to Canada		X		
Admissible to the United States		X	X	
Permissible to Work or Study in the United States		X	X	
Permissible to Work or Study in Canada		X		
All Ages May Apply		X	X	
18 Years of Age or Older	X			
Custodial Parents or Guardians Must have Evidence of Custody		X	X	
Valid Driver's License	X			
Approved SENTRI or NEXUS Members with Fingerprints on File				X
Approved Global Entry Members with an RFID Global Entry Card		X	X	

Source: OIG Analysis of the *CBP Consolidated Trusted Traveler Programs Handbook*.

Appendix E
SENTRI Enrollment Process

Source: OIG Analysis.

Appendix F
Potential Trusted Traveler Program Database Queries

TECS

TECS is an information-sharing platform that allows users to access different temporary and permanent enforcement, inspection, and operational records relevant to the anti-terrorism and law enforcement mission of CBP and numerous other Federal departments and agencies that it supports. TECS not only provides a platform for interaction between databases and defined TECS users, but also serves as a data repository to support law enforcement lookouts, border screening, and reporting for CBP's primary and secondary inspection processes.

Source: CBP.

National Crime Information Center

The National Crime Information Center is a Federal Bureau of Investigation computerized index of criminal justice information, such as criminal record history information, fugitives, stolen properties, and missing persons. It is available to Federal, State, and local law enforcement and other criminal justice agencies and is operational 24-hours a day, 365 days a year. This information assists authorized agencies in criminal justice and related law enforcement objectives, such as apprehending fugitives, locating missing persons, locating and returning stolen property, as well as in protecting law enforcement officers encountering individuals described in the system.

Source: Federal Bureau of Investigation.

International Criminal Police Organization

The International Criminal Police Organization enables police in the 190 member countries to work together to communicate securely, share and access vital police information whenever and wherever needed, ensuring the safety of the world's citizens. Its main databases include, but are not limited to, nominal data, stolen and lost travel documents, fingerprints, DNA profiles, firearms, stolen motor vehicles, suspected terrorists, and stolen administrative documents.

Source: International Criminal Police Organization.

Intelligence Fusion System

The Intelligence Fusion System is a U.S. Immigration and Customs Enforcement-operated system with two distinct purposes. First, the Intelligence Fusion System provides search and limited analysis capabilities to DHS components responsible for enforcing or administering U.S. customs and immigration laws, as well as other laws within the DHS mission. Second, the Intelligence Fusion System acts as the repository for the U.S. Immigration and Customs Enforcement's Office of Intelligence work.

Source: U.S. Immigration and Customs Enforcement.

Automated Targeting System (ATS)

ATS is a computerized decision support tool to compare traveler, cargo, and conveyance information against law enforcement, intelligence, and other enforcement data using risk-based targeting scenarios and assessments. ATS support for CBP's mission is directed into five general areas, including land borders. Each sub-system supports the CBP officer in determining whether or not a particular individual or cargo is higher risk than other individuals or cargo.
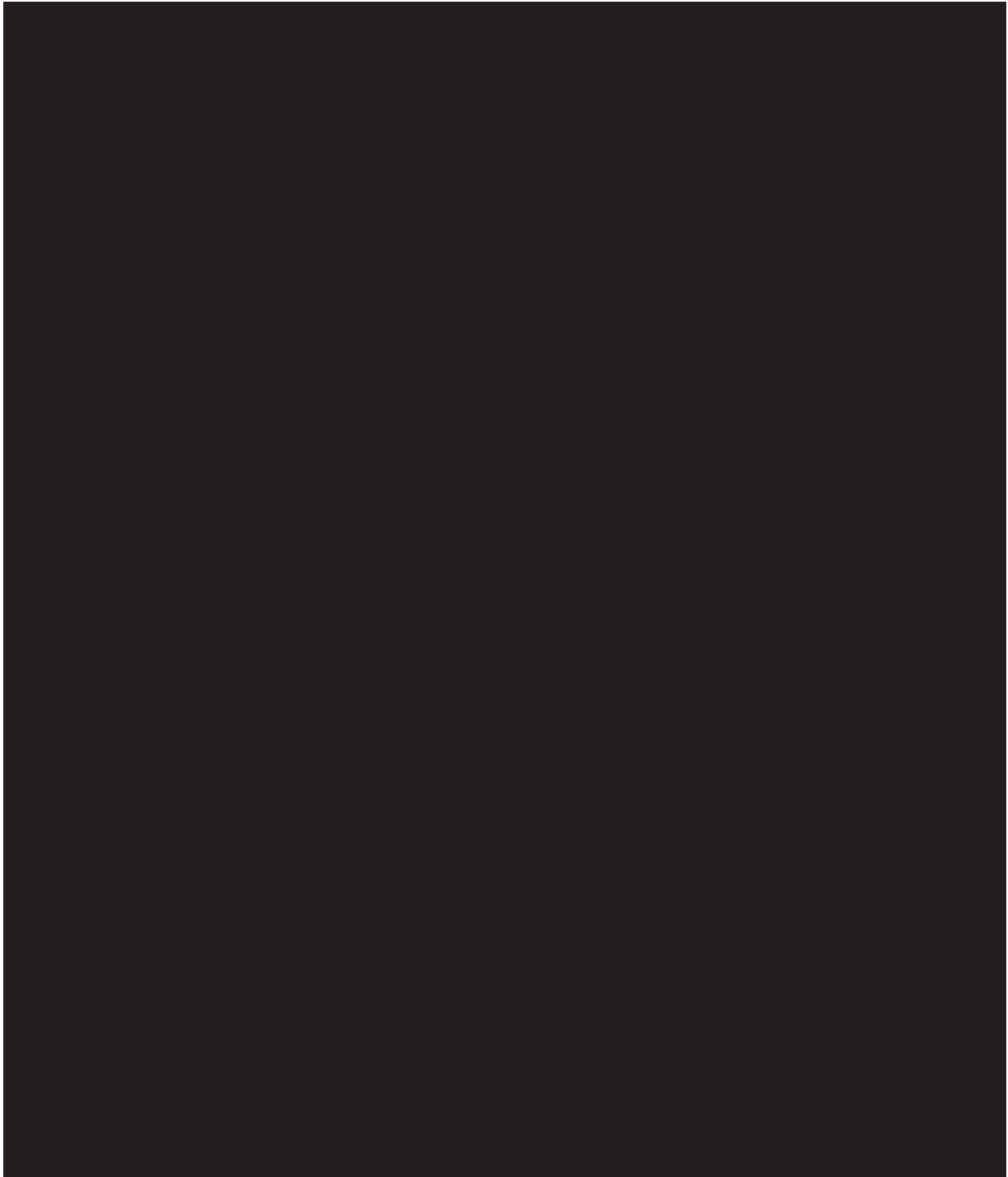
Source: CBP.

Consolidated Consular Database

The Consular Consolidated Database holds current and archived data from the U.S. State Department's Bureau of Consular Affairs domestic and post databases around the world. It contains more than 100 million visa cases and 75 million photographs, and has a current growth rate of approximately 35,000 visa cases every day. It was created to provide the Bureau of Consular Affairs with a near real-time aggregate of the consular transaction activity collected domestically and at post databases worldwide. The Consular Consolidated Database provides for a set of centralized visa and U.S. citizen services.
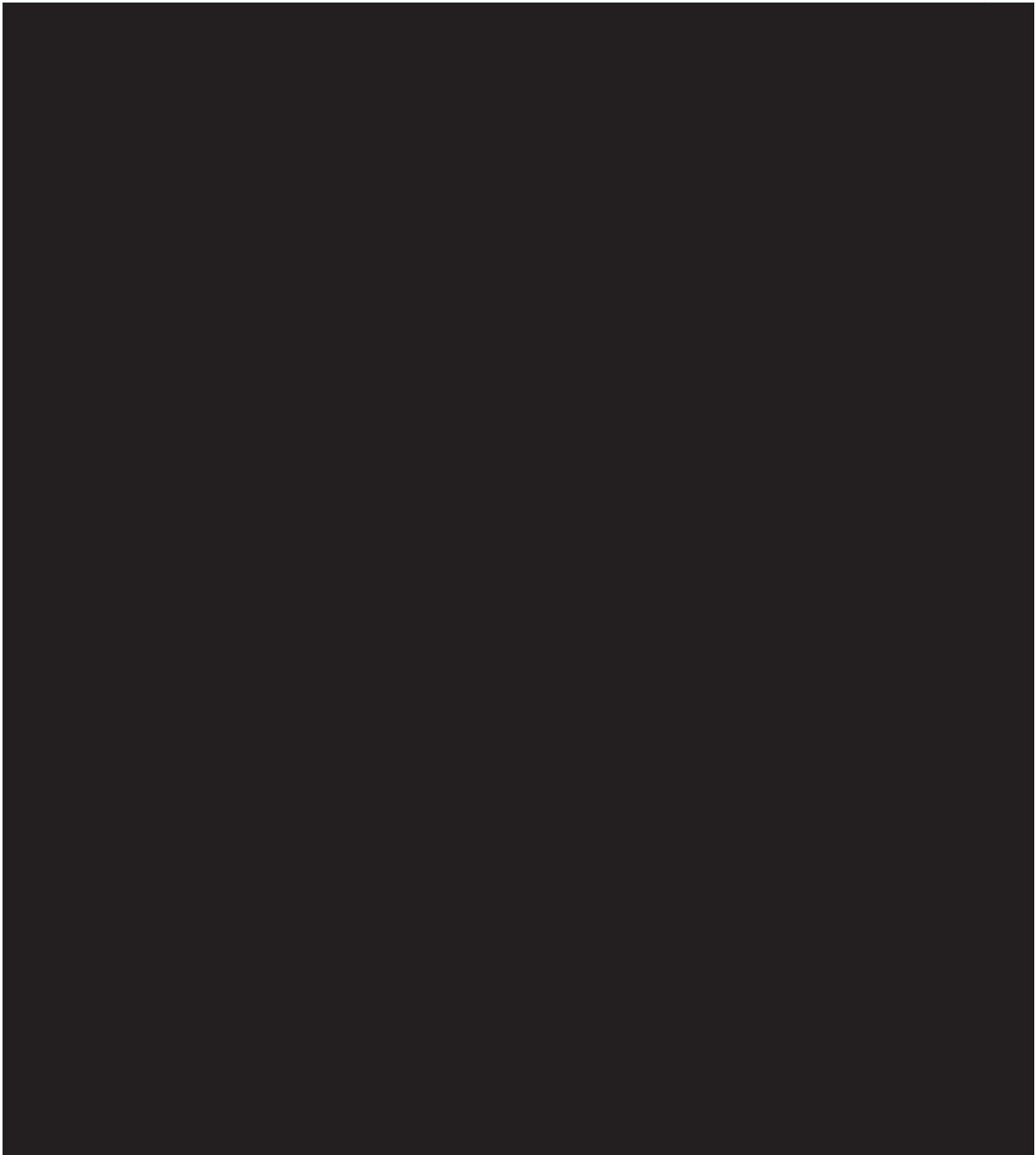
Source: U.S. Department of State.

**Appendix G
Strict Standard Policy**

Appendix H
Enrollment Center Interview Checklist

Source: *Consolidated Trusted Traveler Programs Handbook.*

Appendix I
SENTRI Trusted Traveler Briefing Points

- The issuance of the SENTRI RFID membership card will be received through the mail to a U.S. address.
- Instructions for handling the RFID card and its technology.
- Instructions for declaring merchandise over personal exemption amounts or more than $10,000 in monetary instruments.
- A list of prohibited items.
- Penalties for non-compliance with agency or program requirements.
- An explanation and demonstration of entering the United States as a trusted traveler.
- An explanation on the procedures for reporting an inoperable membership card.
- The requirement to notify CBP of changes of address, immigration status, employment, or name through GOES or the enrollment centers.
- Changes that can be made through GOES by the applicant:
    - Update address and "mail to" address, and
    - Update vehicle license plate information.
- Changes that require an application in GOES:
    - Renewals,
    - Replacement Cards, and
    - Adding a vehicle.
- Access routes to the DCL lanes or pedestrian lanes.
- A list of participating SENTRI POEs, including hours and days of operation.
- How to present the RFID card at the primary vehicle or pedestrian booth.
- The use of SENTRI cards in a non-trusted traveler primary vehicle or pedestrian lanes.
- The requirement that every occupant in a vehicle using the DCL must have a SENTRI card.
- The restrictions on commercial goods, including commercial samples, that are not allowed in the DCL; however, laptop computers used for business purposes and business notes are allowed.
- The exportation of commercial merchandise out of the United States requires a commercial user fee decal to use DCLs.
- SENTRI members may only use the DCLs with a vehicle that is registered with the SENTRI Program, including motorcycles.
- The vehicle license plate must be free of obstructions so that the license plate reader can clearly capture the plate.
- All merchandise must be declared, including duty free merchandise, purchased or acquired outside of the United States. Members are required to declare

everything in their possession, even if the CBP officer does not specifically ask if anything will be declared during primary inspection.

Source: *Consolidated Trusted Traveler Programs Handbook*.

Appendix J
Major Contributors to This Report

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Adam C. Brown, Inspector

Appendix K
Report Distribution

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Director, GAO/OIG Liaison Office
Assistant Secretary for Office of Policy
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CBP Audit Liaison
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Congress

Congressional Oversight and Appropriations Committees, as appropriate

ADDITIONAL INFORMATION

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For further information or questions, please contact Office of Inspector General (OIG) Office of Public Affairs at: DHS-OIG.OfficePublicAffairs@oig.dhs.gov, or follow us on Twitter at: @dhsoig."

OIG HOTLINE

To expedite the reporting of alleged fraud, waste, abuse or mismanagement, or any other kinds of criminal or noncriminal misconduct relative to Department of Homeland Security (DHS) programs and operations, please visit our website at www.oig.dhs.gov and click on the red tab titled "Hotline" to report. You will be directed to complete and submit an automated DHS OIG Investigative Referral Submission Form. Submission through our website ensures that your complaint will be promptly received and reviewed by DHS OIG.

Should you be unable to access our website, you may submit your complaint in writing to:

> Department of Homeland Security
> Office of Inspector General, Mail Stop 0305
> Attention: Office of Investigations Hotline
> 245 Murray Drive, SW
> Washington, DC 20528-0305

You may also call 1(800) 323-8603 or fax the complaint directly to us at (202) 254-4297.

The OIG seeks to protect the identity of each writer and caller.