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## Accessible Version

July 16, 2019

The Honorable Shelley Moore Capito  
Chairwoman  
The Honorable Jon Tester  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
United States Senate

The Honorable Lucille Roybal-Allard  
Chairwoman  
The Honorable Chuck Fleischmann  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
House of Representatives

### **Border Security: Assessment of the Department of Homeland Security's Border Security Improvement Plan**

Within the Department of Homeland Security (DHS), U.S. Customs and Border Protection (CBP) is the lead law enforcement agency responsible for border security. CBP manages approximately 7,000 miles of land border and 95,000 miles of shoreline. CBP is also responsible for managing the flow of trade and travel through 328 land, air, and maritime ports of entry. Several offices within CBP help carry out this mission, including the U.S. Border Patrol, Air and Marine Operations, and Office of Field Operations.

The DHS Appropriations Act, 2018, required the Secretary of Homeland Security to concurrently submit to the House and Senate Appropriations Committees and Comptroller General a risk-based plan for improving security along the borders of the United States, including how CBP intends to use personnel, fencing, other forms of tactical infrastructure, and technology.<sup>1</sup> The act requires us to evaluate this plan and report to the appropriations committees on the strengths and weaknesses of the plan not later than 120 days after receiving it.<sup>2</sup>

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<sup>1</sup>Pub. L. No. 115-141, div. F, tit. II, § 231, 132 Stat 348. The Department of Homeland Security (DHS) Appropriations Act, 2019, requires the Secretary of Homeland Security to submit another risk-based plan for improving U.S. border security including the same elements. Pub. L. No. 116-6, div. A, tit. II, § 230(c), 133 Stat. 13.

<sup>2</sup>We shared our preliminary observations with the appropriations committees in April, 2019.

Pursuant to the language set forth in the 2018 appropriations act, CBP released its Border Security Improvement Plan in December 2018. Previously, the DHS Appropriations Act, 2017, also required the Secretary of Homeland Security to submit to the House and Senate Appropriations committees a risk-based plan for improving border security.<sup>3</sup> Pursuant to the language set forth in the 2017 appropriations act, CBP released its first Border Security Improvement Plan in January 2018.<sup>4</sup> Both plans identify CBP's border security goals and objectives along with specific border security initiatives.

This report addresses the extent to which the Border Security Improvement Plan includes the elements required by the DHS Appropriations Act, 2018. Enclosure I provides our assessment of the extent to which the plan included each of the required elements.

To address this objective, we reviewed the 2017 and 2018 Border Security Improvement Plans to determine the extent to which the required elements were included, as the 2018 plan incorporated the 2017 plan by reference. In addition to reviewing the plans, we reviewed other relevant DHS, CBP, and Border Patrol strategic planning documents and guidance, including the *CBP Vision and Strategy 2020*, *Border Patrol Strategic Plan 2012-2016*, *DHS Border Security Metrics Report 2018*, and the *2014 Southwest Border Technology Plan*. We also reviewed examples of acquisition documents, including life cycle cost estimates and operations requirements documents for certain programs listed in the plan. We reviewed these documents to provide additional context on the information included in the plan. We also reviewed our past work and DHS Office of Inspector General reports on border security issues related to acquisition management, barrier deployment, technology, staffing, and border security metrics, among others.<sup>5</sup> Last, we interviewed officials from CBP and Border Patrol to discuss performance metrics, environmental consultation, land acquisition, and the process for developing the plan, among other topics.

We conducted this work from January 2019 through July 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>3</sup>See Pub. L. No. 115-31, div. F, tit. VI, 131 Stat. 135, 434-5.

<sup>4</sup>Though released in 2018, DHS refers to the plan as its fiscal year 2017 report to Congress. Accordingly, we refer to this as the 2017 plan, where appropriate.

<sup>5</sup>Examples include: GAO, *Arizona Border Surveillance Technology Plan: Additional Actions Needed to Strengthen Management and Assess Effectiveness*, [GAO-14-368](#) (Washington, D.C.: Mar. 3, 2014); GAO, *Southwest Border Security: Additional Actions Needed to Better Assess Fencing's Contributions to Operations and Provide Guidance for Identifying Capability Gaps*, [GAO-17-331](#) (Washington, D.C.: Feb. 16, 2017); and DHS Office of Inspector General, *Border Patrol Needs a Staffing Model to Better Plan for Hiring More Agents*, [OIG-19-23](#) (Washington, D.C.: Feb. 28, 2019).

## Background

### **Required Elements of the Border Security Improvement Plan**

The DHS Appropriations Act, 2018, sets forth 11 required elements for the Border Security Improvement Plan, which are listed below:<sup>6</sup>

- (1) A statement of goals, objectives, activities, and milestones for the plan.
- (2) A detailed implementation schedule for the plan with estimates for the planned obligation of funds for fiscal years 2019 through 2027 that are linked to the milestone-based delivery of specific—
  - (A) capabilities and services;
  - (B) mission benefits and outcomes;
  - (C) program management capabilities; and
  - (D) lifecycle cost estimates.
- (3) A description of the manner in which specific projects under the plan will enhance border security goals and objectives and address the highest priority border security needs.
- (4) An identification of the planned locations, quantities, and types of resources, such as fencing, other physical barriers, or other tactical infrastructure and technology, under the plan.
- (5) A description of the methodology and analyses used to select specific resources for deployment to particular locations under the plan that includes—
  - (A) analyses of alternatives, including comparative costs and benefits;
  - (B) an assessment of effects on communities and property owners near areas of infrastructure deployment; and
  - (C) a description of other factors critical to the decision making process.

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<sup>6</sup>Pub. L. No. 115-141, div. F, tit. II, § 231(a).

- (6) An identification of staffing requirements under the plan, including full-time equivalents, contractors, and detailed personnel, by activity.
- (7) A description of performance metrics for the plan for assessing and reporting on the contributions of border security capabilities realized from current and future investments.
- (8) A description of the status of the actions of the DHS to address open recommendations by the Office of Inspector General and the GAO relating to border security, including plans, schedules, and associated milestones for fully addressing such recommendations.
- (9) A plan to consult State and local elected officials on the eminent domain and construction process relating to physical barriers;
- (10) An analysis, following consultation with the Secretary of the Interior and the Administrator of the Environmental Protection Agency, of the environmental impacts, including on wildlife, of the construction and placement of physical barriers planned along the Southwest border, including in the Santa Ana National Wildlife Refuge; and
- (11) Certifications by the Under Secretary of Homeland Security for Management, that—
  - (A) the plan has been reviewed and approved in accordance with an acquisition review management process that complies with capital planning and investment control and review requirements established by the Office of Management and Budget, including as provided in Circular A–11, part 7; and
  - (B) all activities under the plan comply with Federal acquisition rules, requirements, guidelines, and practices.

### **Border Security Improvement Plan Structure and Content**

The 2018 Border Security Improvement Plan contains information on CBP's border security goals and objectives, border security initiatives and implementation plans, efforts to ensure accountability, and CBP's future planning priorities, among other topics. The 2018 plan was released on December 21, 2018. The plan incorporates, by reference, the goals, objectives, and initiatives included in the 2017 Border Security Improvement Plan, which was released on January 4, 2018. For example, the 2018 plan states that the border security initiatives listed in the plan are based on the initiatives identified in the 2017 plan and were updated according to changes in the threat environment and an assessment of CBP's ability to achieve the goals and objectives set forth in the plan. The 2017 plan has a similar structure to the 2018 plan, but included some additional sections, including a report from DHS's Office of Immigration Statistics titled *Efforts by DHS to Estimate Southwest Border Security Between Ports of Entry* and Border Patrol's *Impedance and Denial Prioritization Strategy*. This strategy is Border Patrol's process for identifying and prioritizing impedance and denial investments—such as different types of barriers and accompanying roads and lighting—along the southwest border, and provides a

priority ranking of locations for new barrier deployment.

The 2017 plan also identified 52 border security initiatives that represent CBP's enforcement efforts. The projects in the plan are grouped into initiatives between the ports of entry (such as the acquisition of surveillance technology and deployment of border barriers and fencing); at the ports of entry (such as cargo container screening); and enterprise-wide initiatives (such as international diplomacy efforts and staffing increases). The 2018 plan included these 52 initiatives and identified four new initiatives. The new initiatives include information technology improvements and establishing specific personnel policies, among other efforts.

### Results in Brief

Our analysis indicates that the 2018 Border Security Improvement Plan includes some, but not all, of the elements required by the DHS Appropriations Act, 2018. For example, as required, the plan includes CBP's border initiatives, which it links to its goals and objectives. Likewise, it also includes a description of how CBP measures performance and a reference to other plans where additional detail can be found. However, the plan does not include many of the other required elements or provide information on why these elements were not included in the plan.

Specifically, the plan does not provide estimates for the planned obligation of funds through 2027. It also does not include information on all its completed and planned life cycle cost estimates or how the projects under the plan will address the highest priority border security needs. The plan provides CBP's definition of an alternatives analysis, but otherwise provides only limited information on alternatives analyses it is conducting (or has conducted). Moreover, the plan does not include an assessment of the effects of infrastructure deployment on communities and property owners.

In addition, the plan lists 47 open border-security recommendations we have made and 31 recommendations from DHS's Office of Inspector General. However, we identified nine additional recommendations we have made to the department related to border security programs and efforts that were not included in the plan, and the plan did not include schedules and associated milestones for addressing all of the recommendations it listed.

The plan states that CBP has consulted with federal stakeholders concerning the environmental impacts of border barriers, but provides no details on the results of those consultations. Finally, the plan does not include information on how it was reviewed and approved and does not include certification or confirmation that all activities conducted under the plan comply with federal acquisition rules, requirements, guidelines, and practices.

CBP officials stated that the Border Security Improvement Plan may not have included all of the act's required elements because the timing of each fiscal year's appropriation presents challenges in preparing the plan, such as limited time to engage in planning activities. Further, officials said that the requirement to complete the 2018 plan came shortly after the release of

the 2017 plan, and therefore CBP decided to focus primarily on updating budget information for the plan's initiatives since many of the initiatives themselves had not changed. Officials added that the timing of the Border Security Improvement Plan update does not always align to CBP's execution of funds, which officials said tend to run on 2 to 3-year performance periods. For example, a senior CBP official said that updates to the 2017 *Impedance and Denial Prioritization Strategy* (an appendix of the 2017 plan) were not included in the 2018 plan because the strategy had not changed. The official said that since new barrier construction is now underway, future versions of the Border Security Improvement Plan will update select aspects of the *Impedance and Denial Prioritization Strategy*.

CBP has produced a Border Security Improvement Plan, as required, but CBP's plan does not include all of the required elements laid out in the DHS Appropriations Act, 2018. Additionally, there is no explanation why particular elements were not included, which limits the usefulness of CBP's plan as an oversight, decision-making, and accountability tool. The DHS Appropriations Act, 2019, includes a requirement for DHS to provide Congress and us with a risk-based plan for improving border security that includes the same 11 elements required by the DHS Appropriations Act, 2018. Ensuring that the 2019 Border Security Improvement Plan includes the statutory requirements, or notes why those requirements were not included, would better position CBP to provide Congress with useful information for overseeing CBP's border security efforts and holding CBP accountable for results.

## Conclusions

Given CBP's border security responsibilities and the billions of dollars appropriated in recent years for securing U.S. borders, a thorough, risk-based plan would provide Congress with important information on how CBP intends to achieve its security goals. CBP's current Border Security Improvement Plan describes CBP's various initiatives, but does not include several statutorily required elements (such as life cycle costs or a link between CBP's initiatives and its highest priority border security needs) that would provide a more complete picture of CBP's efforts. Ensuring that the next iteration of the Border Security Improvement Plan includes the statutorily required elements or discloses why any element was not included would aid Congress in its oversight of CBP's border security efforts and help hold CBP accountable for results.

## Recommendation for Executive Action

The Secretary of Homeland Security should ensure that the fiscal year 2019 plan includes the statutorily required elements or discloses why any element was not included in the plan. (Recommendation 1)

## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provide written comments, which are reproduced in full in enclosure II. DHS also provided technical comments, which we incorporated as appropriate.

DHS concurred with our recommendation and discussed actions underway to address it. Specifically, CBP's Offices of the Commissioner and Operations Support are currently developing the fiscal year 2019 Border Security Improvement Plan and reported taking steps during the planning phase to ensure that all statutorily-required elements are included in the plan. For example, CBP reported that it is preparing a description of performance metrics to assess and report on the contributions of border security capabilities realized from current and future investments, as required. Further, if for any reason an element is not included in the plan, CBP plans to provide a written explanation in the plan for any omissions. We believe that these actions, if effectively implemented, would address our recommendation.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-6912 or [gablerr@gao.gov](mailto:gablerr@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report include Jeanette Henriquez (Assistant Director), Charlotte Gamble (Analyst in Charge), Jason Jackson, Jon Najmi, and Alexis Olson.



Rebecca Gamble,  
Director, Homeland Security and Justice  
Enclosures – 2

Enclosure I: GAO Assessment of the DHS Appropriation Act, 2018, Required Elements for the Border Security Improvement Plan

**The Border Security Improvement Plan Includes Goals, Objectives, Activities, and Milestones**

Border Security Improvement Plan Requirement #1

A statement of goals, objectives, activities, and milestones for the plan.

**GAO Summary Assessment**

The 2018 Border Security Improvement Plan includes goals, objectives, activities, and milestones. The plan identifies three goals used to establish a framework for how CBP will analyze and prioritize strategies and investments. Each goal includes three objectives with intended outcomes; key capabilities (such as domain awareness and risk assessment, for example); activities, technology, and resources; and fiscal year 2018-2020 milestones. The plan also includes 56 initiatives (52 initiatives which were first identified in the 2017 plan and four additional initiatives identified in the 2018 plan). The initiatives are each linked to a goal and an objective (with associated activities, technology, and resources). Table 1 provides an example of one of the goals (goal 1) and the objectives, milestones, and some of the activities associated with this goal included in the plan.

**Table 1: 2018 Border Security Improvement Plan, Goal 1 and Associated Objectives, Activities, and Milestones**

**Goal 1: Enhance understanding of border threats and risks**

- **Objective 1:** Increase situational awareness
  - Examples of Associated Activities, Technology, and Resources: Ground sensors, biometrics, mobile surveillance.
  - Example of Fiscal Year 2018-2020 Milestone: Establish a repeatable and standardized process for developing CBP's Priority Intelligence Requirements.
  
- **Objective 2:** Advance risk-management in decision making
  - Examples of Associated Activities, Technology, and Resources: Acquisition management; data analysis
  - Example of Fiscal Year 2018-2020 Milestone: Develop risk assessment tools to expand identification of individuals and entities that have a nexus to illicit financing and terrorism-related activities.
  
- **Objective 3:** Identify and counter criminal and terrorist organizations and networks
  - Examples of Associated Activities, Technology, and Resources: Information sharing; operational and tactical risk management
  - Example of Fiscal Year 2018-2020 Milestone: Advance initiatives, programs, and systems to protect the Homeland from terrorists and their weapons.



## The Border Security Improvement Plan Does Not Include a Detailed Implementation Schedule Linked to Program Management Capabilities or Life Cycle Cost Estimates

### Border Security Improvement Plan Requirement #2

A detailed implementation schedule for the plan with estimates for planned obligation of funds for fiscal years 2019 through 2027 that are linked to the milestones based on specific

- A. capabilities and services;
- B. mission benefits and outcomes;
- C. program management capabilities; and
- D. life cycle cost estimates.

### GAO Summary Assessment

In the 2018 plan, CBP does not provide estimates for the planned obligation of funds for fiscal years 2019 through 2027 that are based on specific capabilities and services, mission benefits and outcomes, program management capabilities, or life cycle cost estimates. For some of the initiatives in the 2017 and 2018 plans, CBP describes capabilities, mission benefits, and related outcomes, but does not link this information to the planned obligation of funds through 2027. Rather, CBP provides the current fiscal year's enacted funding level and the following year's presidential budget request for each program. The plan states that planned obligation of funds through 2027 was not included because actual funding amounts had not been determined and would be addressed in future budget cycles.

Regarding capabilities, mission benefits, and outcomes, the 2018 plan describes what CBP considers as key capabilities for some of the plan's identified goals and objectives. For example, key capabilities for CBP's goal of enhancing understanding of border threats and risk include risk assessment and information sharing. CBP also described the expected mission benefits and outcomes of the initiatives included in the 2018 plan. CBP identified the goals and objectives to which some of the plan's initiatives are aligned. Additionally, the *Impedance and Denial Prioritization Strategy* (within the 2017 Border Security Improvement Plan) describes the potential benefits of what Border Patrol refers to as an integrated "Border Wall System," including the ability to strategically deploy agents and resources and the ability to impede movement toward the border.<sup>7</sup>

CBP did not, however, include information (in the 2018 or 2017 plans) on program management capabilities or on all its completed and planned life cycle cost estimates. In the 2017 plan, CBP

<sup>7</sup>CBP uses the term "wall system" to describe planned combinations of barriers, separated by an enforcement zone; lighting and surveillance technology for the barriers and enforcement zone; access roads; and interfaces for current or future technologies to support detection capabilities. For further information on the Border Wall System Program, see GAO, *Southwest Border Security: CBP Is Evaluating Designs and Locations for Border Barriers but Is Proceeding Without Key Information*, [GAO-18-614](#) (Washington, D.C.: Aug. 6, 2018).

stated that it has developed, and will continue to develop, cost estimates for the acquisition programs that are part of the plan. The plan identified one program for which CBP has conducted a life cycle cost estimate, but no details of the estimate were provided in the plan and CBP did not indicate which other programs have completed cost estimates or which were required to do so.<sup>8</sup> In May 2019, CBP officials provided us a list of several other programs for which they had completed cost estimates, including multiple border surveillance technology programs, non-intrusive cargo inspection technology, audio and video surveillance at land ports of entry and other select locations, and for programs and systems used to store foreign visitor and immigration data.

CBP stated that it follows the cost estimating guidance set forth in several policy guides and instructions, including DHS's Cost Estimating Handbook and our Cost Estimating and Assessment Guide.<sup>9</sup> We have defined a cost estimate as the summation of individual cost elements, using established methods and valid data, to estimate the future costs of a program, based on what is known today. The ability to generate reliable cost estimates is a critical function necessary to support the Office of Management and Budget's (OMB) capital programming process. Without this ability, agencies are at risk of experiencing cost overruns, missed deadlines, and performance shortfalls—all recurring problems that our program assessments too often reveal.

As noted in our Cost Estimating and Assessment Guide, certain best practices should be followed if accurate and credible cost estimates are to be developed. These best practices represent an overall process of established, repeatable methods that result in high-quality cost estimates that are comprehensive and accurate and that can be easily and clearly traced, replicated, and updated. Examples of steps in a high-quality cost-estimating process include documenting the estimate (including the estimating methodology and rationale to derive each element's cost) and updating the estimate to reflect actual costs.

Our previous work has identified weaknesses in CBP's life cycle cost estimates for certain border security-related investments. For example, in March 2014 we reported on DHS's efforts to deploy surveillance technologies along the southwest border and found that CBP's life-cycle cost estimates for three technology programs reflected some, but not all, best practices for lifecycle cost estimates. We recommended, among other things, that CBP verify its life-cycle cost estimates with independent cost estimates and reconcile any differences.<sup>10</sup> CBP implemented this recommendation and continues to work toward developing life cycle cost estimates for its remaining acquisition programs.

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<sup>8</sup>The plan states that a life cycle cost estimate was conducted for the Remote Video Surveillance System. Remote Video Surveillance System provides persistent wide-area day and night motion imagery surveillance and monitoring capability. Located on dedicated elevated fixed towers or tall structures, Remote Video Surveillance System cameras provide persistent ground surveillance capability to deter, detect, and track items of interest.

<sup>9</sup>GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Capital Program Costs*, [GAO-09-3SP](#) (Washington, D.C.: Mar. 2, 2009).

<sup>10</sup>GAO, *Arizona Border Surveillance Technology Plan: Additional Actions Needed to Strengthen Management and Assess Effectiveness*, [GAO-14-368](#) (Washington, D.C.: Mar. 3, 2014).

## The Border Security Improvement Plan Links CBP's Initiatives to Its Goals and Objectives, but Does Not Describe How Projects Address the Highest Priority Border Security Needs

### Border Security Improvement Plan Requirement #3

A description of the manner in which specific projects under the plan will enhance border security goals and objectives and address the highest priority border security needs.

#### GAO Summary Assessment

The 2018 Border Security Improvement Plan lists 56 border security initiatives and links the initiatives to CBP's border security goals and objectives, but the plan does not indicate how the initiatives address the highest priority border security needs. The 2018 plan specifically states that the initiatives are not provided in a priority order and does not include a description of the highest priority border security needs (or a reference to another document where that information can be found).

In February 2019, CBP officials told us there were efforts underway to integrate priorities across the different offices within CBP, including Border Patrol, Office of Field Operations, and Air and Marine Operations, among others. According to officials, these efforts, which are not expected to be completed until late 2019, are intended to help identify the highest priority border security needs.

Within CBP, some components and offices have processes for identifying needs and priorities and potential solutions to address those needs and priorities. For example, Border Patrol officials told us that the agency uses its Capability Gaps Analysis Process (CGAP) to identify capability gaps and potential solutions, which can range from a major acquisition to a policy change. CGAP is part of Border Patrol's broader Requirements Management Process, which was designed to facilitate planning for funding and deploying border security requirements, such as surveillance technology and barriers.

In February 2017 we reported that this process includes steps to identify mission priorities and goals and to determine capability gaps and potential solutions.<sup>11</sup> CBP and Border Patrol used this process in developing the *Impedance and Denial Prioritization Strategy*, included in the 2017 plan. In this strategy, CBP identified a priority ranking of 33 border groups, and this ranking represented CBP's priority locations for deploying physical barriers along the southwest border. According to Border Patrol officials, CGAP was part of the process used to arrive at the ranked list of 33 border groups.<sup>12</sup>

<sup>11</sup>GAO, *Southwest Border Security: Additional Actions Needed to Better Assess Fencing's Contributions to Operations and Provide Guidance for Identifying Capability Gaps*, [GAO-17-331](#) (Washington, D.C.: Feb. 16, 2017).

<sup>12</sup>Within these 33 border groups, groups 1 through 17 were identified as the highest priority. These 17 groups encompass 722 miles of new impedance and denial system—316 miles of new primary pedestrian barrier, 272 miles of new secondary pedestrian barrier, and 135 miles of pedestrian and vehicle barrier replacement. CBP estimates the investment to construct barriers in these 17 priority areas to total approximately \$18 billion.

## The Border Security Improvement Plan Describes How Barrier Locations Were Identified and Provides Information on Technology Locations and Quantities

### Border Security Improvement Plan Requirement #4

An identification of the planned locations, quantities, and types of resources, such as fencing, other barriers, or other tactical infrastructure and technology, under the plan.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan provides information on planned locations and quantities for CBP's priority locations for border barrier deployments, but does not provide information on the types of border barrier deployments. The plan also provides some information on the planned locations, quantities, and types of other resources, such as surveillance technology.

In May 2019, CBP officials provided an update on barrier deployments. Specifically, officials reported that CBP had completed 39.5 of the 40 miles of replacement barrier funded by the fiscal year 2017 appropriations act, with the remaining half-mile expected to be completed by the end of May 2019. CBP also reported that construction was underway for 80 miles of new and replacement barrier funded by the fiscal year 2018 appropriations act. Specifically, construction is underway for approximately 14 miles of replacement barrier in San Diego and for 13 miles of new barrier and levee wall system in the Rio Grande Valley of Texas. CBP officials also stated that contracts have been awarded for approximately 41 miles of replacement barrier in San Diego and Calexico, California, and Yuma, Arizona. Last, officials reported that 12 miles of new border barriers in the Rio Grande Valley were to be awarded by the end of fiscal year 2019. DHS's fiscal year 2019 appropriation includes \$1.976 billion for approximately 85 miles of new barriers in the Rio Grande Valley.

CBP also provided an update on technology deployments. In Rio Grande Valley, CBP reported deploying 14 of 28 Mobile Video Surveillance System units—a truck-mounted system with cameras and laser illuminators—with the remaining units expected to be deployed by the end of fiscal year 2019. CBP also reported making progress deploying Remote Video Surveillance System towers—cameras and laser illuminators mounted on fixed and relocatable towers—to Rio Grande Valley, with 20 relocatable towers deployed and additional fixed and relocatable towers expected to be deployed by the end of fiscal year 2020.

With regard to information on planned locations and quantities for border barriers, the *Impedance and Denial Prioritization Strategy* documents CBP's process for identifying and prioritizing impedance and denial investments along the southwest border. CBP identified lengths of proposed border barrier miles, which resulted in 197 segments of varying distances. CBP then scored the segments based on data in three categories and came up with a numerical

priority ranking of all 197 segments.<sup>13</sup> The segments were then organized into 33 groups for evaluation and prioritization.

Although CBP identified planned locations and quantities of border barriers, we have previously identified weaknesses in CBP's methodology. Specifically, we reported in July 2018 that CBP's methodology did not include an analysis of the costs associated with deploying barriers in each location or segment, which can vary depending on topography, land ownership, and other factors.<sup>14</sup> We found that without assessing costs, CBP does not have complete information for prioritizing locations to use its resources in the most cost-effective manner. We recommended that CBP analyze the costs associated with future barrier segments and include cost as a factor in the *Impedance and Denial Prioritization Strategy*. CBP agreed with this recommendation and as of May 2019 was taking actions to address it.

With regard to information on planned locations and quantities of technology and other resources, the 2018 plan provides information on CBP's surveillance technology investments and deployment locations. For example, the plan identifies a variety of surveillance technologies, including mobile and fixed systems, and identifies the existing and planned locations and quantities for many of these systems. In 2017, we reported on CBP's efforts to deploy surveillance technology under its *Southwest Border Technology Plan*.<sup>15</sup> We reported that Border Patrol had made progress deploying technologies but that some technologies had not yet begun deployment or were not under contract.<sup>16</sup>

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<sup>13</sup>The segments were ranked by the following three categories: Ability to Achieve Strategic Objectives (40% weight); Analysis of Border Census Data (40% weight); and Operational and Engineering Feasibility (20% weight).

<sup>14</sup>GAO, *Southwest Border Security: CBP is Evaluating Designs and Locations for Border Barriers but Is Proceeding Without Key Information*, [GAO-18-614](#) (Washington, D.C.: July 30, 2018).

<sup>15</sup>GAO, *Southwest Border Security: Border Patrol Is Deploying Surveillance Technologies but Needs to Improve Data Quality and Assess Effectiveness*, [GAO-18-119](#) (Washington, D.C.: Nov. 30, 2017).

<sup>16</sup>We reported that Border Patrol developed the Southwest Border Technology Plan using a two-step process. First, the Homeland Security Studies and Analysis Institute conducted an analysis of alternatives, which analyzed five technology options in 13 representative areas along the southwest border, identified the types of environmental conditions under which a given technology option might be more effective or less effective, and provided a general overview of the cost and effectiveness tradeoffs between the technologies. Second, Border Patrol developed a technology deployment plan that identified the types and quantities of each technology needed for each sector. To develop this plan, Border Patrol officials reviewed the results of the analysis of alternatives and considered each sector's operational conditions, including patterns of traffic, terrain, infrastructure, weather, available resources, and challenges.

## The Border Security Improvement Plan Includes a Limited Description of the Methodology or Analyses Used to Select Resources for Deployment

### Border Security Improvement Plan Requirement #5

A description of the methodology and analyses used to select specific resources for deployment to particular locations under the plan that includes

- A. Analyses of alternatives, including comparative costs and benefits
- B. An assessment of effects on communities and property owners near areas of infrastructure deployment
- C. A description of other factors critical to the decision making process.

### GAO Summary Assessment

The Border Security Improvement Plan includes a limited description of the methodology or analyses used to select resources for deployment to specific locations. The plan provides CBP's definition of an alternatives analysis, but otherwise provides only limited information on alternatives analyses it is conducting (or has conducted). Further, the plan does not include an assessment of the effects of infrastructure deployment on communities and property owners or a description of other factors critical to the decision making process.

With regard to analyses of alternatives, the plan states that CBP follows the acquisition policies and processes set forth in DHS's management directives, which includes analyzing alternatives for its major and non-major acquisition programs.<sup>17</sup> Specifically, in the "analyze and select" phase of the acquisition life cycle, the program manager reviews alternative approaches to meeting a need and recommends a best option to the relevant decision authority.<sup>18</sup> The Border Security Improvement Plan does not indicate which of the initiatives listed in the plan have conducted an alternatives analysis, nor which are required to do so. The plan simply lists three examples of programs in which alternatives analyses are being completed.

We have previously identified four characteristics that encompass the practices necessary to produce high quality, reliable analyses of alternatives.<sup>19</sup> Those characteristics require an alternatives analysis to be well documented (i.e., analysis process is thoroughly described, including all source data, methodologies, calculations, and results); comprehensive (i.e., level of

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<sup>17</sup>DHS policies and processes for managing its major acquisition programs are primarily set forth in its Acquisition Management Directive 102-01 and DHS Instruction Manual 102-01-001, Acquisition Management Instruction/Guidebook. DHS acquisition policy categorizes acquisition as major acquisitions and non-major acquisitions. Among other differences, major acquisitions generally have a life cycle cost estimate greater than or equal to \$300 million; non-major acquisitions generally have a life cycle cost estimate of less than \$300 million.

<sup>18</sup>The four phases of DHS's acquisition framework are: (1) Need, (2) Analyze and Select, (3) Obtain, and (4) Produce/Deploy, Support. See GAO, *Homeland Security Acquisitions: Leveraging Programs' Results Could Further Improve DHS's Progress to Improve Portfolio Management*, [GAO-18-339SP](#) (Washington, D.C.: May 17, 2018).

<sup>19</sup>GAO, *Joint Intelligence Analysis Complex: DOD Partially Used Best Practices for Analyzing Alternatives and Should Do So Fully for Future Military Construction Decisions*, [GAO-16-853](#), (Washington, D.C.: Sept. 30, 2016).

detail ensures no alternatives are omitted and that each alternative is examined thoroughly for the project's entire life-cycle); unbiased (i.e., does not have a predisposition towards one alternative over another but is based on traceable and verified information); and credible (i.e., discusses any limitations of the analysis resulting from the uncertainty surrounding the data to assumptions made for each alternative).

In addition to not including alternatives analyses, the 2018 plan does not provide an assessment of the effects on communities and property owners near areas of infrastructure deployment or other critical decision making factors, as required. CBP officials told us that CBP assessed effects on communities and property owners when conducting landowner meetings and environmental surveys of affected properties for each project, but the 2018 plan does not include information on these efforts.

The DHS Appropriations Act, 2019, requires CBP to engage in community interaction related to border barrier deployment. Specifically, the act places new restrictions on the use of funds for CBP barrier construction in certain listed cities and one specified census-designated place while DHS and local elected officials confer and seek to reach mutual agreement as to the design and alignment of physical barriers in such city or place.<sup>20</sup> Prior to fiscal year 2019, CBP officials said they were not required to seek "consensus" with communities, but they worked with communities on border barrier deployments whenever possible. Officials reported that they were scheduling meetings with county officials to share designs and gather input. As of May 2019, CBP officials reported they had held one meeting with local elected officials and communities to share barrier design proposals.

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<sup>20</sup>Pub. L. No. 116-6, div. A, tit. II, § 232(a). Such consultations between DHS and local elected officials shall continue until September 30, 2019 (or until agreement is reached, if earlier) and may be extended beyond that date by agreement of the parties; and no funds made available in this Act shall be used for such construction while consultations are continuing.



## The Border Security Improvement Plan Provides Limited Information on Staffing Requirements and Omits Contractor Requirements For Most Initiatives

### Border Security Improvement Plan Requirement #6

An identification of staffing requirements under the plan, including full-time equivalents, contractors, and detailed personnel, by activity.

### GAO Summary Assessment

The Border Security Improvement Plan does not identify staffing requirements for most of the initiatives identified in the plan. Furthermore, the plan does not provide staffing information for the number of contractors required to support most of the applicable initiatives.

Offices within CBP, such as Border Patrol and the Office of Field Operations, have mechanisms in place or under development to identify staffing requirements, but identified some challenges with doing so in the context of the Border Security Improvement Plan. For example, Border Patrol officials said they are in the process of finalizing its personnel requirements determination process, which is expected to be complete at the end of fiscal year 2019. This process is designed to help Border Patrol identify its personnel requirements and align these requirements to current and future operational needs.

In February 2019, the DHS Office of Inspector General reported on Border Patrol's efforts to develop a staffing model and found that Border Patrol lacked the data and procedures needed to determine how many agents were needed to meet its mission requirements.<sup>21</sup> According to the Inspector General, Border Patrol has not completed a satisfactory workforce staffing model. Without this information, Border Patrol and senior managers are unable to definitively determine the operational need and best use for the additional Border Patrol agents DHS was directed to hire per Executive Order 13767 issued in January 2017.<sup>22</sup>

<sup>21</sup>Department of Homeland Security, Office of Inspector General, *Border Patrol Needs a Staffing Model to Better Plan for Hiring More Agents*, OIG-19-23 (Washington, D.C.: Feb. 28, 2019).

<sup>22</sup>CBP was directed to hire 5,000 additional Border Patrol agents, subject to available appropriations. See Border Security and Immigration Enforcement Improvements, Exec. Order No. 13767, § 8, 82 Fed. Reg. 8793, 8795 (Jan. 30, 2017) (issued Jan. 25). GAO reported in 2018 that consistent with this directive, Border Patrol is aiming to attain a staffing level of 26,370 agents (5,000 above the fiscal year 2016 statutorily-established level). At the time of the President's directive to hire and onboard 5,000 Border Patrol agents, the government was operating under a continuing resolution extending fiscal year 2016 funding, and related provisos such as the 21,370 Border Patrol agent workforce floor, into fiscal year 2017. See GAO-18-487 and see Further Continuing Appropriations Act, 2017, Pub. L. No. 114-254, div. A, 130 Stat. 1005, 1005-22 (2016); and Consolidated Appropriations Act, 2016, Pub. L. No. 114-113, div. F, tit. II, 129 Stat. 2242, 2495 (2015). Border Patrol's fiscal year 2017, 2018 and 2019 appropriations did not mandate an overall Border Patrol agent workforce floor. See Explanatory Statement (163 Cong. Rec. H3327, H3809-10 (daily ed. May 3, 2017)) accompanying Pub. L. No. 115-31, 131 Stat. 135; Pub. L. No. 115-141, 132 Stat. 348; Pub. L. No. 116-6, div. A, 133 Stat. 13 (according to the 2019 joint explanatory statement, funding is provided to sustain the current level of Border Patrol agents).



## The Border Security Improvement Plan Includes Performance Metrics, but Some Measures Are Undeveloped or Have Limitations

### Border Security Improvement Plan Requirement #7

A description of performance metrics for the plan for assessing and reporting on the contributions of border security capabilities realized from current and future investment.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan discusses the department's performance measures; however, we have previously identified limitations with these measures. The 2018 plan discusses performance metrics in three broad groups—security at the immediate border, security in the air and marine environment, and security at the ports of entry. The plan also lists several ways in which CBP reports its performance, including in the *Border Security Metrics* reports and in a September 2017 report on security between the ports of entry.<sup>23</sup>

In addition to these reports, the plan discusses CBP's measure of Operational Control (OPCON), which was reinstated in response to Executive Order 13767.<sup>24</sup> According to the 2018 plan, OPCON is a function of three elements: impedance and denial (including physical barriers and measures of recidivism); situational awareness (including technologies that allow Border Patrol to detect, identify, and track illegal entries, as well as intelligence capabilities); and law enforcement resolution (including the ability to respond to detections and make a final apprehension). The plan states that Executive Order 13767 calls for complete OPCON along the southern border, which it defines as the prevention of all illegal entries into the United States, including entries by terrorists, other illegal aliens, and instruments of terrorism, narcotics, and other contraband. In March 2019, Border Patrol officials discussed their progress implementing the OPCON framework and developing associated performance measures. Officials said that they had developed 18 measures for OPCON which would be finalized by the end of fiscal year 2019.

We have previously reported on CBP's efforts to assess the contributions of fencing and

<sup>23</sup>Department of Homeland Security, Office of Immigration Statistics, *Efforts by DHS to Estimate Southwest Border Security Between Ports of Entry*, (Washington, D.C.: Sept. 2017); Department of Homeland Security, *Border Security Metrics Report* (Washington, D.C.: May 1, 2018).

<sup>24</sup>According to the 2017 plan, OPCON was first introduced by Border Patrol in 2004 as a resource-based strategy to enhance land border security between ports. Between fiscal years 2005-2010, Border Patrol quantified OPCON by miles along the border as one of four levels of OPCON: controlled, managed, monitored, and low-level monitored. CBP moved away from its original OPCON measure in 2011 because, according to the plan, it depended on measuring resource inputs (specifically, personnel, technology, and infrastructure), which was difficult in the federal budget environment at the time. Following OPCON, Border Patrol pursued a risk-based strategy that prioritized operations geographically based on the level of risk within individual operating environments. Since 2012, Border Patrol has used a framework for relative risk assessment called "State of the Border," which classifies southern border sectors as high, medium, or low risk.

technology deployments along the southwest border. For example, in February 2017, we reported that CBP has not assessed the contributions of border fencing to border security operations.<sup>25</sup> According to CBP, from fiscal years 2007 through 2015, it spent approximately \$2.3 billion to deploy border fencing along the southwest border and estimated that maintaining fencing would cost more than \$1 billion over 20 years. Despite these investments, we reported that CBP could not measure the contribution of fencing to border security operations along the southwest border because it has not developed metrics for this assessment. Accordingly, we recommended that CBP develop metrics to assess the contributions of pedestrian and vehicle fencing to border security along the southwest border and apply this information, as appropriate, when making investment and resource allocation decisions. CBP agreed with this recommendation and as of October 2018 was taking actions to address it.

Regarding technology deployments, we reported in 2014 that CBP had identified the mission benefits for technologies—such as mobile and fixed surveillance systems—under the Southwest Border Technology Plan, but had not developed performance metrics.<sup>26</sup> We recommended that CBP analyze available data to determine the contribution of surveillance technologies to CBP’s border security efforts. CBP concurred with this recommendation and as of May 2019 was taking actions to address it.

In addition, in March 2019, we reported on our review of DHS’s *Border Security Metrics Report*—one of the reports in which DHS communicates its performance measures, as identified in the 2018 Border Security Improvement Plan.<sup>27</sup> Among other things, we reported that, in general, DHS had processes to help ensure the reliability of the data and the quality of the information used in reporting on the performance metrics included in the *Border Security Metrics Report*. However, DHS did not have a systematic process for reviewing the reliability of data to identify limitations related to the metrics. Even as DHS identified and disclosed limitations related to some of its metrics, we identified at least one additional limitation for 21 of the 35 metrics where DHS did not disclose such limitations or could have been more transparent about the limitations in its report. We recommended that DHS develop and implement a process to systematically review the reliability of the data used in its *Border Security Metrics Report* and comprehensively identify any limitations with the data and methodologies that underlie its metrics. DHS concurred with this recommendation.

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<sup>25</sup>GAO, *Southwest Border Security: Additional Actions Needed to Better Assess Fencing’s Contributions to Operations and Provide Guidance for Identifying Capability Gaps*, [GAO-17-331](#) (Washington, D.C.: Feb. 16, 2017).

<sup>26</sup>GAO, *Arizona Border Surveillance Technology Plan: Additional Actions Needed to Strengthen Management and Assess Effectiveness*, [GAO-14-368](#) (Washington, D.C.: March 3, 2014).

<sup>27</sup>GAO, *Border Security: DHS Should Improve the Quality of Unlawful Border Entry Information and Other Metric Reporting*, [GAO-19-305](#) (Washington, D.C.: March 21, 2019).

## The Border Security Improvement Plan's List of Open Recommendations Generally Lacks Milestones, Plans, and Schedules for Closing Recommendations

### Border Security Improvement Plan Requirement #8

A description of the status of the actions of the Department of Homeland Security to address open recommendations by the Office of Inspector General and the Government Accountability Office relating to border security, including plans, schedules, and associated milestones for fully addressing such recommendations.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan lists 47 recommendations we have made in recent years and 31 recommendations from the DHS's Office of Inspector General. However, we identified nine additional recommendations we had made to the department related to border security programs and efforts that were not included in the plan. Further, the plan did not include schedules and associated milestones for addressing all of the recommendations it listed.

More specifically, we identified nine additional recommendations of ours related to border security which remained open as of February 2019.<sup>28</sup> Examples of recommendations we identified (that were not included in the 2018 Border Security Improvement Plan) include ways to improve trade enforcement efforts; strengthen efforts to address subterranean, aerial, and maritime smuggling; and enhance monitoring of short-term holding facilities.

In order to identify recommendations for the 2018 plan, CBP officials explained that the CBP Management Inspections Division ran an internal report that listed all open GAO and Inspector General recommendations that CBP was responsible for tracking. Next, that list was sent to the relevant CBP offices for officials to identify whether they believed the open recommendations were related to border security. The Management Inspections Division then sent the CBP-identified lists of border security recommendations to CBP's Office of Operations Support. Operations Support officials told us that their role was to compile information and they were not responsible for the content or identifying any missing or incomplete information.

CBP officials explained that 5 of the 9 additional recommendations we identified were not included in CBP's list because they had been assigned to another DHS component for tracking and implementation. Specifically, these recommendations were made to both CBP and Immigration and Customs Enforcement (ICE), but had been assigned to ICE. While CBP may not be responsible for tracking these 5 recommendations, they still relate to border security and therefore we believe should be included in the Border Security Improvement Plan's list of open

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<sup>28</sup>We identified open border security recommendations by querying GAO's public recommendations database for all recommendations to DHS, then filtering to recommendations to CBP. We then reviewed each recommendation to determine if it was related to border security, which we defined as anything related to CBP enforcement activities at the border, at the ports of entry, or between the ports of entry, or any activities that affect CBP's ability to carry out its mission, including planning and monitoring efforts.

border-related recommendations. Regarding the other four recommendations we identified, CBP officials agreed that they were border security-related and should be included in the plan.

Additionally, many of the entries detailing the department's plans for closing open recommendations do not detail schedules for completing actions, or the described actions do not address one or more substantive parts of the recommendation. For example, of our 47 recommendations that CBP included in the 2018 plan, 26 are missing schedules and/or associated milestones for closure. In May 2019, CBP officials said that many recommendations did not have interim milestones, but rather just an expected completion date. Officials added that future versions of the plan will be revised to include the expected completion date for each open recommendation.

## The Border Security Improvement Plan Does Not Describe How DHS Plans to Consult with State and Local Entities Regarding Land Acquisition

### Border Security Improvement Plan Requirement #9

A plan to consult State and local elected officials on the eminent domain and construction process relating to physical barriers.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan does not include a plan to consult state and local elected officials on the eminent domain and construction processes relating to physical barriers. This applies to physical barriers as well as related roads and construction staging areas. Officials said they are taking action to comply with the DHS Appropriations Act, 2019, requirement to confer with and seek to reach mutual agreement with local elected officials regarding barrier design and alignment in certain locations.<sup>29</sup> For example, officials said in May 2019 that they were setting up meetings with officials in one county in Texas to discuss barrier designs and gather input.

CBP officials told us that in lieu of formal plan to consult with state and local officials, the agency has established an outreach strategy. Officials stated in May 2019 that a description of this strategy could be included in future versions of the Border Security Improvement Plan. Regarding CBP's outreach strategy, CBP officials told us that eminent domain is just one of the tools at their disposal for acquiring land.<sup>30</sup> Typically, CBP prefers to acquire land through voluntary sale. However, officials explained that the Lower Rio Grande Valley of Texas presents a unique challenge because real estate ownership is not clear in many places.

Second, officials said they were presently unable to identify owners for 80 parcels of land where they plan to deploy barriers. In other cases, an individual may claim to own the land but cannot provide documentation to support the claim. When CBP cannot identify a land owner, it has to enter into condemnation procedures, according to CBP officials. In cases where CBP has identified a land owner but that owner does not want to sell the land to the government, CBP can enter into eminent domain proceedings, according to officials. Under eminent domain proceedings, CBP and the landowner would present legal arguments in court over the best use and fair value of the land.

CBP officials did not have a timeline for determining ownership for all the land upon which they want to place barriers. Officials explained that this is because surveys, title searches, and appraisals are conducted by the U.S. Army Corps of Engineers as funds for planning and construction become available.

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<sup>29</sup>Pub. L. No. 116-6, div. A, tit. II, § 232(a).

<sup>30</sup>See 8 U.S.C. § 1103(b) (DHS's land acquisition authority).

## CBP Is Assessing the Environmental Impacts of New Barrier Construction, but Provides Limited Details of These Efforts in the Border Security Improvement Plan

### Border Security Improvement Plan Requirement #10

An analysis, following consultation with the Secretary of the Interior and the Administrator of the Environmental Protection Agency, of the environmental impacts, including on wildlife, of the construction and placement of physical barriers planned along the Southwest border, including in the Santa Ana National Wildlife Refuge.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan states that CBP initiated coordination with the Department of Interior, U.S. Fish & Wildlife Service, and Environmental Protection Agency in spring 2017 to inform them of the planning, design, and construction phases for border barriers, and to consult on resources that may be present in project areas. The plan states that an analysis of the potential impacts from barrier projects in the Rio Grande Valley will be prepared once data are collected and further consultation with resource agencies is completed, but the plan does not indicate when this analysis is expected to be completed. The plan also states that CBP's fiscal year 2018 barrier projects incorporate the concerns and considerations of relevant federal and state agencies; however, the plan provides no additional detail on what these concerns are or how they are being considered.

In our March 2019 discussions with CBP, officials elaborated on its assessment efforts. First, CBP officials stated that the agency prepares Environmental Stewardship Plans in those locations where the DHS Secretary has invoked the authority to waive any legal requirements in order to ensure the expeditious construction of border barriers.<sup>31</sup> Officials said that Environmental Stewardship Plans are comparable to the assessments the department would otherwise complete under the National Environmental Policy Act of 1969 (NEPA), such as an Environmental Impact Statement.<sup>32</sup> CBP officials stated that their assessments identify sensitive resources in an area (such as the presence of endangered species), the impacts of CBP's activities, and strategies to mitigate those impacts.

Officials said it is standard policy to complete an Environmental Stewardship Plan; however, CBP had not set forth a standard protocol for these assessments, including standards for outreach or coordination. CBP has completed 26 Environmental Stewardship Plans since 2005, including 11 in Arizona and five in Texas. In March 2019, CBP reported having two plans underway—one for 14 miles of barrier replacement in San Diego Sector and one for

<sup>31</sup>The REAL ID Act of 2005 amended the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 by expanding the authority of the Secretary of Homeland Security to waive all legal requirements, as determined to be necessary, in the Secretary's sole discretion, to ensure expeditious construction of barriers and roads along the border. Pub. L. No. 104-208, div. C, tit. I, subtit. A, § 102(c), 110 Stat. 3009, 3009-555, as amended by Pub. L. No. 109-13, div. B, tit. I, § 102, 119 Stat. 231, 306 (classified, as amended, at 8 U.S.C. § 1103 note).

<sup>32</sup>See Pub. L. No. 91-190, tit. I, § 102, 83 Stat. 852, 853-4 (classified, as amended, at 42 U.S.C. § 4332).

construction of new levee border wall in the Rio Grande Valley Sector. Despite having completed 26 Environmental Stewardship Plans, the Border Security Improvement Plan includes no details of these analyses.

## The Border Security Improvement Plan Does Not Include Information on How the Plan Was Reviewed and Approved

### Border Security Improvement Plan Requirement #11

Certifications by the Under Secretary of Homeland Security for Management, that—

(A) the plan has been reviewed and approved in accordance with an acquisition review management process that complies with capital planning and investment control and review requirements established by the Office of Management and Budget, including as provided in Circular A-11, part 7; and

(B) all activities under the plan comply with Federal acquisition rules, requirements, guidelines, and practices.

### GAO Summary Assessment

The 2018 Border Security Improvement Plan does not include information on how the plan was reviewed and approved. The plan also lacks certification or confirmation that all activities conducted under the plan comply with federal acquisition rules, requirements, guidelines, and practices.

Officials told us that the plan went through CBP and DHS's standard review process, which included multiple rounds of review and input from all CBP offices (including Border Patrol, Office of Field Operations, and Air and Marine Operations). The draft was then provided to CBP Operations Support for review and clearance and then provided to the Office of Congressional Affairs, which requested additional information from some CBP offices. The draft was next sent to DHS headquarters for review and signature.

Regarding confirmation that all activities under the plan comply with federal acquisition rules, requirements, guidelines, and practices, officials explained that not all of the initiatives in the plan are acquisition programs—some of the initiatives in the plan are policy changes, for example. For those initiatives that are acquisition programs, the 2017 plan states that DHS has adopted a four-phase acquisition lifecycle framework that links the department's various requirement-development and budgeting processes. The plan states that all initiatives in the plan—including fencing and technology—have been overseen by the DHS acquisition lifecycle framework process. The programs are in different phases of the acquisition process; however, the plan does not note which phase each program is in.



## Enclosure II: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

July 1, 2019

Rebecca Gambler  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-19-538R, "BORDER SECURITY:  
Assessment of the Department of Homeland Security's Border Security  
Improvement Plan"

Dear Ms. Gambler:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The U.S. Customs and Border Protection's (CBP) top priority is to keep terrorists and their weapons from entering the U.S. while welcoming all legitimate travelers and commerce. CBP officers and agents enforce all applicable U.S. laws, including those against illegal immigration, narcotics smuggling and illegal importation through 328 land, air, and maritime ports of entry (POEs) covering approximately 7,000 miles of land border and 95,000 miles of shoreline. In doing this, CBP deploys highly trained law enforcement personnel who apprehend nearly 1,000 individuals each day for suspected violations of these laws.

CBP's border security mission is led at POEs by CBP officers from the Office of Field Operations, and along U.S. borders by agents from the United States Border Patrol and from the air and sea by agents from Air and Marine Operations. Also at POEs, agriculture specialists are deployed to protect U.S. agriculture from the introduction of pests or disease from overseas sources. In addition to managing our Nation's borders across this complex and vast area, CBP is constantly faced with ever-changing transnational criminal organizations and networks that seek to exploit any and all weaknesses in border security. To reach its goals and better accomplish its daily tasks,

CBP must continue to improve existing capabilities, develop new ones for the changing operational environment, and adapt its processes to better organize, train, equip and sustain its frontline operators.

The challenging environment CBP operates in demonstrates the importance of the Border Security Improvement Plan (BSIP) and an agency-wide strategic vision. CBP is committed to ensuring that the 2019 BSIP satisfies congressional requirements, while enabling the primary function of the plan, which is to communicate the decision making process and recommended investments to Congress.

The draft report contained one recommendation, with which the Department concurs. Attached find our detailed response to the recommendation. Technical comments were previously provided under separate cover.

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

Sincerely,



for JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendation  
Contained in GAO-19-538R**

GAO recommended that the Secretary of Homeland Security:

**Recommendation 1:** Ensure that the fiscal year [FY] 2019 plan includes the statutorily required elements or discloses why any element was not included in the plan.

**Response:** Concur. CBP will ensure that all statutorily required elements are included in the FY 2019 BSIP and future reports. CBP's Offices of the Commissioner and Operations Support are currently in the process of developing the FY 2019 BSIP and have taken steps during the planning phase to ensure that all statutorily-required elements are included in the FY 2019 BSIP report. Examples include:

- CBP is preparing a description of performance metrics in accordance with the requirement to assess and report on the contributions of border security capabilities realized from current and future investments.
- CBP is aligning performance metrics, investments, and CBP's 2020 – 2025 Strategic Plan's strategic initiatives to demonstrate how current investments drive desired outcomes in a complex border environment.

If for any reason an element is not included, CBP will provide a written explanation for the omission in the plan. Estimated Completion Date: October 31, 2019.

## **Text of Enclosure II: Comments from the Department of Homeland Security**

### Page 1

Rebecca Gambler  
Director, Homeland Security and Justice  
U.S. Government Accountability Office 441 G Street, NW  
Washington, DC 20548

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### Page 2

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JIM H. CRUMPACKER, CIA, CFE

Director

Departmental GAO-OIG Liaison Office

Page 3

Attachment

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If for any reason an element is not included, CBP will provide a written explanation for the omission in the plan. Estimated Completion Date: October 31, 2019.

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