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TO: Kevin Shea
Acting Administrator
Animal and Plant Health Inspection Service

ATTN: Joanne L. Munno
Deputy Administrator
Marketing and Regulatory Programs Business Services

FROM: Gil H. Harden
Assistant Inspector General for Audit

SUBJECT: Effectiveness of the Smuggling, Interdiction, and Trade Compliance Unit

This report presents the results of the subject review. Your written response to the official draft report, dated June 29, 2012, is included in its entirety at the end of the report. Excerpts from your response and the Office of Inspector General's position are incorporated into the relevant sections of the report. Based on your written response, we are accepting your agency's management decisions for all audit recommendations in the report and no further response to us is necessary. In accordance with Departmental Regulation 1720-1, final action on the management decision should be completed within 1 year of the date of the management decisions to preclude being listed in the Department's annual Performance and Accountability Report.

We appreciate the courtesies and cooperation extended to us by members of your staff during our audit fieldwork and subsequent discussions.

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Effectiveness of the Smuggling, Interdiction, and Trade Compliance Unit

Executive Summary

The Smuggling, Interdiction and Trade Compliance (SITC) unit is part of the Animal and Plant Health Inspection Service's (APHIS) Plant Protection and Quarantine (PPQ) program. SITC's mission is to identify and prevent the unlawful entry and distribution of prohibited agricultural products that may harbor plant and animal pests, diseases or invasive species. These prohibited products and pests cause billions of dollars in lost revenue and millions in cleanup costs—with some scientists estimating their economic impact exceeding \$1 billion annually in the United States.¹

The methods by which these products enter the country are called “pathways” that SITC, in conjunction with other agencies, must seek to “close.”² SITC's officers in the field represent the last line of defense to identify, seize, and then close the pathways for prohibited products to prevent future shipments from entering the U.S. market place. SITC's mission is accomplished by its officers that perform unannounced market surveys, in places like retail stores and distribution centers, with the goal of identifying new pathways and seizing prohibited agricultural products.³ After SITC identifies a prohibited product, it can work with the Department of Homeland Security's Customs and Border Protection (CBP) authorities to stop future shipments from entering the United States. SITC meets its mission by successfully seizing or generating a trace back of a prohibited product found in the marketplace, and working with other agencies to close the new pathway through which it entered.⁴ We evaluated SITC's effectiveness and coordination with other agencies in identifying new pathways for prohibited agricultural products, and its corrective actions to close those pathways.

After reviewing SITC activities from fiscal year (FY) 2008 through FY 2011, we found that SITC's control environment did not include a system of management accountability in order to foster efficiency, adequacy, or accuracy in either achieving its core mission or in reporting its results. For example, we found that 90 percent of SITC's market surveys were not successful at either seizing a prohibited product or in generating a trace back to identify the importer of a prohibited product. For the surveys that were successful in these two areas, SITC did not take further action to stop future shipments for 96 percent of the higher-risk imported prohibited products it seized.⁵ Finally, for the cases where SITC did take further action, officers did not

¹ Plant Protection and Quarantine, *APHIS Factsheet*, dated August 2010.

² According to SITC's *Strategic Plan*, dated May 2008, a pathway is both the point where a prohibited product enters the United States (port-of-entry or crossing), and the distributing importer, regardless of how it is transported.

³ SITC's website explains that a market can include major distribution centers, flea markets, farmers markets, animal/plant and insect trade shows, large and small chain stores, roadside vendors, or a neighborhood corner store.

⁴ During a trace back, SITC officers attempt to determine who the importer is and how and where the prohibited items entered the United States.

⁵ APHIS defines low-risk products, but not high-risk products. For purposes of this report, we defined higher-risk products as anything that did not appear on APHIS' low risk list.

perform follow-up visits at one third of the high-risk markets⁶ to ensure that the pathway remained closed.⁷ When we discussed SITC's low success rates for seizing prohibited products and closing pathways with the Deputy Administrator in charge of SITC, she noted that although nationwide benchmarks had never been established in the interest of allowing SITC officers maximum flexibility in performing their duties, the success rates we cited were surprisingly low given SITC's mission (i.e., to identify new pathways). In addition, we found that in the few offices that closely followed SITC guidance, proactively cooperated with other agencies, or timed visits outside of normal business hours, success rates were significantly higher (see Finding 2). As a result of SITC's low success rates, there is an increased risk that prohibited products would not be identified by its officers and these products could move through the country and further spread foreign plant disease and pests that could devastate U.S. agriculture.

We also found that SITC used an unapproved information technology (IT) system for 3 years without informing APHIS' IT division (ITD) of its existence or ensuring that reports from that system were accurate and supported. SITC management did not inform APHIS' ITD because the IT system was developed "in-house" and, therefore, did not realize the need for it to go through the required Federal approval process to secure it from unauthorized access or dissemination of personally identifiable information. In addition, we found that SITC's reports generated from this IT system contained unsupported field data (such as the results of SITC officers' market surveys), because SITC management did not require its supervisors to review the report for accuracy before publication. For instance, when APHIS reported SITC's FY 2010 accomplishments to Congress, it overstated the number of violations SITC recommended for investigation by 106 percent.⁸ We issued a Fast Report⁹ on the issue of the unapproved IT system in April 2011, and APHIS took immediate actions on our recommendations. However, SITC has not yet implemented the corrective actions necessary to ensure its reports to Congress are accurate and supported.

Overall, PPQ upper management trusted its managers and staff without providing sufficient requirements and directions for them to follow.¹⁰ In addition, SITC did not hold managers and supervisors accountable for ensuring their staff was successful at identifying and closing new pathways for imported prohibited products, which are key to SITC achieving its mission. PPQ upper management officials stated that they wanted to give officers maximum flexibility to adapt their activities to local needs. While flexibility is an important quality for a unit like SITC, we found that PPQ management did not enforce accountability across supervisory levels. This weakened PPQ's ability to ensure the efficient and effective use of Federal funds, and did not ensure that adequate safeguards were in place to protect its IT systems.

⁶ SITC defines a high-risk market as one where SITC officers previously seized a prohibited imported product and notified CBP to close that pathway. SITC encourages its officers to conduct follow up market surveys for these high-risk markets.

⁷ A pathway, which is the route that a prohibited product enters the United States and delivered to a market, is considered closed once a specific prohibited product is no longer able to enter the country through that particular pathway.

⁸ APHIS' FY 2012 Budget Explanatory Notes (justifications of proposed funding changes for FY 2012, as well as explanations of ongoing programs).

⁹ Fast Report 33601-0012-CH (1), issued April 7, 2011.

¹⁰ For the purposes of this report, we define upper management as the SITC National Coordinator and APHIS regional directors.

Subsequent to our discussions with APHIS officials, PPQ's Deputy Administrator took immediate action to analyze SITC operations. In October 2011, she established a working group to assess SITC's role within PPQ. On February 8, 2012, PPQ issued a list of proposals on its plan to improve the SITC program. Our review of that report found that it presented a meaningful plan of action to improve SITC's management accountability and the results of its operations. PPQ plans to fully implement all of the working group's recommendations by March 2013.

Recommendation Summary

APHIS needs to assess the effectiveness of SITC's mission, oversight, communication and monitoring. We also recommend that SITC provide its officers with guidance so that they can better identify new pathways and develop procedures to ensure that managers and supervisors oversee this effort and analyze officers' effectiveness. SITC also needs to clarify and strengthen instructions on closing pathways, and establish a procedure for performing follow-up surveys. It should take actions to close pathways for higher-risk products SITC has already seized. The agency also needs to implement policies and procedures to ensure that accurate data is entered into SITC's IT system and supportable reports are available from that system. We further recommend that APHIS complete the approval process for the IT system and take steps to protect data until that process is complete. APHIS' IT division should also review its servers to identify any additional unauthorized systems.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that they agreed with all the recommendations and that PPQ management has already formed a Technical Working Group to analyze current data and identify patterns of prohibited product movement that present a tangible threat. PPQ management has agreed to issue new Standard Operating Procedures (SOP) to ensure that SITC managers and supervisors oversee and analyze officers' effectiveness. They have also agreed to issue an SOP with instructions for taking actions to close pathways. APHIS has agreed to implement policies to ensure accurate data is entered into SITC' IT system as well as ensure supportable reports are available from that system. APHIS has already taken action towards completing approval for its IT system and has agreed to complete the approval of the current system as well as identify any additional unauthorized systems.

OIG Position

We accept APHIS' management decisions for all recommendations listed in this report.

Background and Objectives

Background

The Animal and Plant Health Inspection Services' (APHIS) mission of protecting the health and value of U.S. agriculture and natural resources is achieved through its nine programs. Within APHIS, Plant Protection and Quarantine's (PPQ) programs are designed to safeguard agriculture and natural resources from the risks associated with the entry, establishment, and spread of animal and plant pests and noxious weeds. These programs are primarily focused at ports-of-entry to identify both prohibited and allowable items that could harbor animal diseases and plant pests. In 2001, PPQ established the Smuggling Interdiction and Trade Compliance (SITC) unit to specifically handle smuggling and trade compliance issues both before and after they impact U.S. markets. However, in 2002 the Department of Homeland Security (DHS) was authorized, and in 2003, DHS' Customs and Border Protection (CBP) assumed authority for the ports-of-entry. SITC's duties were shifted primarily to marketplace locations. SITC's mission is to identify and close new pathways for the unlawful entry and distribution of prohibited or noncompliant products that may harbor exotic plant and animal pests, diseases or invasive species. SITC is the second-line of defense for ports-of-entry, and functions by identifying prohibited products in the marketplace (i.e., retail stores, warehouses, and distribution centers, or home-based businesses). The Plant Protection Act of 2000¹¹ and associated Federal regulations¹² provide SITC's authority to hold, seize, and destroy any prohibited plant pest or plant product.

Prohibited products include items such as imported wood bark that harbors tree-killing emerald ash borers or giant African land snails that reproduce rapidly and consume both vegetation and building materials. SITC personnel perform unannounced visits to retail stores, product distribution centers, and other locations to identify prohibited products and the pathways by which they enter the country.¹³ In the marketplace, SITC officers perform surveys, which are random inspections and trade compliance activities, to uncover imported prohibited products (such as pork products from China) or domestic regulated agricultural items (such as citrus tree branches from Florida). During a market survey, a SITC officer may generate a "trace" by gathering information about where a prohibited product came from, and using that information to trace back how the product reached the marketplace, including the port-of-entry where it came into the United States. The primary reason for generating a trace to the port-of-entry is to identify the distributor or importer. Once identified, SITC management works with either APHIS' Investigative Enforcement Services division to pursue civil or criminal prosecutions and issue product recalls, or with CBP to stop future shipments from entering the United States.

SITC's mission is considered successful whenever one of its officers seizes an imported prohibited product found in the marketplace or generates a trace that identifies the pathway through which that product entered. Due to the nature of SITC's work in identifying smuggling

¹¹ 7 U.S.C. 7731, dated June 20, 2000.

¹² 7 CFR, part 330, dated December 10, 1997, and part 360, dated November 10, 2010, and 9 CFR, part 94, dated February 7, 2003.

¹³ SITC's website explains that a market can be major distribution centers, flea markets, farmers markets, animal/plant and insect trade shows, large and small chain stores, roadside vendors, or a neighborhood corner store.

activity, PPQ and SITC management officials have not established specific benchmarks for evaluating SITC's expected success rates for these activities. In addition, SITC has not defined how to calculate the success rate for a particular office or officer. For purposes of this audit, we calculated SITC's success rate (as a percentage) by dividing the number of instances when officers seized prohibited products or generated traces (whether one or several products) during a particular market survey by the total number of market surveys completed. For example, if SITC performed 10 market surveys and seized 20 products at 5 different markets, its success rate would be 50 percent (5 different markets divided by 10 total market surveys, multiplied by 100 to arrive at a percentage). Therefore, given SITC's mission, the higher the percentage, the more successful SITC would be at meeting its mission.

SITC's management structure includes several layers of supervision. At APHIS Headquarters, a national coordinator develops policy and directs the program nationwide. At APHIS' two regional offices, regional program managers work with the PPQ assistant regional director to implement policy and provide oversight to the PPQ State plant health directors. SITC uses seven State plant health directors to provide guidance and oversight to seven SITC area managers covering multiple States. Area managers, in turn, oversee several supervisors who evaluate field offices and local SITC officers' work. (See exhibit A.) The program has about 150 employees and approximately 60 field offices. Large offices, such as the one located in New York City, operate with as many as eight officers, while many offices have only one or two officers.

In addition to Federal laws and regulations, SITC's main program guidance is the *Reference Guide* and *Standard Operational Procedures* manuals.¹⁴ In addition, SITC has several data analysts that provide support for tracing pathways. The data analysts also provide SITC and PPQ management with program reports and other information generated from a central system that contains the results of all SITC officers' market surveys and product seizures. The information technology (IT) system also contains personal information, such as the name, address, and social security numbers of importers, as well as law enforcement information shared from other agencies, such as CBP. SITC also uses its system to report program statistics.

Objectives

To evaluate the effectiveness of APHIS' PPQ/SITC unit in identifying new pathways by which prohibited products are entering into the country, and in the subsequent reporting and corrective actions implemented to close those pathways.

¹⁴ *SITC Reference Guide*, dated November 2009.

Section 1: Internal Control Structure

Finding 1: APHIS Needs to Establish Adequate Internal Controls

APHIS' internal control structure did not include a system of management accountability to ensure that PPQ's SITC unit effectively met its primary mission—to identify and prevent the entry and distribution of prohibited products—or used only approved and secured IT systems. This occurred because PPQ relied on its SITC managers and supervisors to properly perform their duties without ongoing oversight, such as the establishment of program benchmarks and periodic reporting to ensure that the unit was performing effectively and complying with APHIS policies and procedures. Within PPQ's SITC unit, upper management officials stated that they wanted to give their field officers maximum flexibility to adapt their activities to local needs.¹⁵ Although flexibility is an important quality for a unit like SITC, we found that APHIS' insufficient internal controls created a culture that did not foster accountability for supervisors in the field. As a result, we found that SITC officers had a 10 percent success rate in identifying new pathways for importing prohibited products during market surveys nationwide (see Finding 2), and only took actions to prevent the import of future shipments for 4 percent of the new pathways identified (see Finding 3). In addition, APHIS was unaware that SITC had been operating an unauthorized IT system for at least 3 years, without the required certification and accreditation review to ensure that its sensitive information was kept secure (see Finding 4).

The Government Accountability Office (GAO) established five goals which call for government agencies to establish a control environment that sets a “positive and supportive attitude toward internal control and conscientious management.”¹⁶ These goals also include assessing risks; establishing policies, procedures, techniques, and mechanisms that enforce management's directions; effectively communicating information; and monitoring a program's performance over time and promptly resolving identified issues. For PPQ's SITC unit, we determined that APHIS did not adequately meet the five GAO goals.

Overall Control Environment: APHIS established a control environment within SITC that relied upon the program's upper management to inform APHIS headquarters' management if there was a problem, without requiring them to periodically report on the program's effectiveness. This reliance filtered through to supervisors at the State and local levels, as neither PPQ nor SITC upper management required their supervisors to perform periodic oversight of field operations.¹⁷ SITC's upper management did not require this oversight based on their belief that supervisors were adequately overseeing employees in the field, and did not perform reviews of their own to support that belief. In addition, neither PPQ's nor SITC's upper management properly exercised their oversight authority to ensure managers and supervisors were held accountable for deficiencies. This policy had repercussions that impacted the entire program. For instance, we found that PPQ upper management had

¹⁵ For the purposes of this report, we define upper management as SITC's National Coordinator and regional directors.

¹⁶ GAO/AIMD-00-21.3.1, *Standards for Internal Control in the Federal Government*, dated November 1999, and OMB Circular A-123, *Management's Responsibility for Internal Control*, dated December 2004.

¹⁷ State and area level supervisors are the State Plant Health Directors (SPHDs) and SITC area managers (SAMs).

neither established a success rate for its officers to meet nor required reporting on how successful SITC was nationwide. As a result, SITC managers and supervisors were not aware of SITC officers' 10 percent success rate in identifying new pathways for importing prohibited products during its market surveys nationwide (see Finding 2). In addition, when SITC officers did identify new pathways, they were successful only 4 percent of the time in taking actions to prevent future shipments from being imported into the United States (see Finding 3). Similarly, SITC upper management did not timely inform APHIS' IT division when it implemented a key IT system. SITC also did not evaluate the IT system according to a required APHIS procedure intended to secure such systems from unauthorized use or data dissemination. We determined that SITC used this system—which held both sensitive personal information and law enforcement data—for at least 3 years without APHIS management becoming aware of it (see Finding 4).

Performance Monitoring: PPQ did not hold its SITC managers accountable for monitoring program performance. Specifically, PPQ did not require the establishment of key benchmarks to measure the success rate for its officers in performing market surveys. While SITC managers required individual offices to create annual work plans, they did not follow-up later to compare those work plans to how successful SITC offices were in identifying and closing new pathways for imported prohibited products. This occurred because SITC management officials had not established specific benchmarks for evaluating SITC's expected success rates for the activities listed in an office's work plan. In addition, SITC has not defined (i.e., whether to include seizures, traces, or both) in their calculation of a success rate for a particular office or officer. As a result, SITC managers did not take any action against one SITC office that succeeded in identifying prohibited products in just 3 percent of its market surveys per year for the last 3 years. APHIS' Deputy Administrator for PPQ considered these success rates low and in need of improvement, but could not provide a specific performance benchmark because APHIS had not previously established one that its field officers were expected to meet.¹⁸ In addition, SITC's upper management did not establish procedures to require that its managers and supervisors ensure the accuracy of the national database—SITC's central reporting tool—by periodically reviewing reports of field officers' success rates in identifying and closing new pathways.

Risk Assessment: PPQ and SITC management did not perform risk assessments to identify or analyze risks associated with SITC's mission.¹⁹ Not only did the lower levels not perform risk assessments, but PPQ and SITC upper management were unaware that these risk assessments were not being completed (see Finding 2). Without risk assessments, PPQ and SITC officials do not have a clear picture of how to effectively allocate either staff or SITC's \$16 million budget.

Control Mechanisms: PPQ did not ensure that SITC officers followed program guidance (see Findings 2 and 3). While management believed that supervisors carried out control activities as part of their inherent responsibility, our audit discovered that many were not

¹⁸ APHIS officials stated that the lack of nationwide benchmarks reflected SITC's policy of giving each field office the maximum possible flexibility in carrying out the agency's mission.

¹⁹ SITC could use risk assessments to target their market surveys by identifying markets where prohibited products were previously seized or the location of importers that continually violate import requirements.

doing so. Also, different office locations had different understandings as to when they should take actions to close a pathway because SITC upper management had not issued clear guidance. We found that one office chose not to take the prescribed action because “doing so was a hassle with too much red tape.” In another case, one SITC supervisor repeatedly requested guidance from regional management about SITC’s priorities so that he could develop a required annual plan to reflect those priorities, but management failed to respond to his requests.

Communication: PPQ performed a quality assurance review (QAR) for 8 of 16 SITC work units between August 2008 and January 2010.²⁰ As of November 2011, PPQ did not ensure that SITC took action on any of the QAR’s recommendations. For instance, one QAR found that the supervisor at a certain office was not using the SITC database to review the activities of his officers. The QAR recommended that the supervisor begin reviewing the database. The QAR also recommended that he involve other SITC staff to improve the risk analysis and targeting process. However, during our site visit to this same office, the Office of the Inspector General (OIG) found identical problems over a year later. The supervisor for this location stated that he did not know the results of the QAR review and had previously asked SITC management about them. However, he had yet to receive any feedback. When we asked SITC upper management about this issue, we were told that the national coordinator was still evaluating the review.

APHIS national officials expressed a desire to take swift action on many of the problems we identified in our fieldwork. A Deputy Administrator for PPQ agreed that SITC was not as productive as it could be, and organized a working group to consider cost savings and efficiencies in all of PPQ programs, including SITC.

We cooperated with the working group during their research and shared the results of our audit work with them. We believe that the working group’s recently released recommendations are a positive step that, in part, will hold its managers and supervisors accountable for the actions of their staff.²¹ By taking swift action on the remaining working group recommendations, APHIS management can be assured that its programs and divisions meet their respective missions in the most effective and efficient way possible.

Recommendation 1

Implement clear benchmarks and expectations for SITC field staff that will improve the program’s effectiveness in meeting its mission objectives, and require SITC managers and supervisors to exercise sufficient oversight to ensure that the unit’s mission is effectively achieved.

²⁰ The purpose of the SITC QAR process was to provide a mechanism to evaluate the core components of the SITC program at the Work Unit level. This review was intended to ensure that operational procedures were executed consistently across work units with a high degree of efficiency and effectiveness, and in accordance with established regulations, policies, and procedures.

²¹ *Improving the Smuggling Interdiction and Trade Compliance (SITC) Program: Plan to Address OIG Draft Findings, and Revise and Streamline the SITC Program*, dated February 8, 2012.

Agency Response

In the agency's response, dated June 29, 2012, APHIS officials stated that they agreed with the recommendation and that PPQ management has already formed a Technical Working Group to analyze current data and identify patterns of prohibited product movement that present a tangible threat. The Technical Working Group will have approximately 90 days (June to August 2012) to produce an initial list of targeted national, regional, and local priorities and products on which SITC personnel should focus. The Technical Working Group will develop guidance to aid SITC personnel in making risk-based decisions. PPQ management anticipates that the list of priorities and practical guidance will be available for use by SITC personnel by October 31, 2012. PPQ management will review the output of the Technical Working Group, along with recently updated performance measures to establish clear benchmarks and expectations by October 31, 2012. In a subsequent emailed response on July 12, 2012, APHIS stated it has also provided detailed checklists, based on existing performance plans, position descriptions and instructions, to managers and supervisors for use during mid-year and annual performance reviews to assist in performance management.

OIG Position

We accept APHIS' management decision.

Recommendation 2

Develop a time-phased action plan to implement the recommendations of the already-established working group, including procedures for PPQ and SITC upper management to periodically review reports of SITC's effectiveness at meeting established benchmarks and expectations.

Agency Response

In APHIS' response, dated June 29, 2012, and in a subsequent emailed response on July 18, 2012, agency officials stated that they developed a time-phased action plan to implement changes to the SITC program, and effective on December 31, 2012, PPQ and SITC upper management will be required to review reports of SITC's effectiveness at meeting established benchmarks and expectations at least twice yearly. The regular individual performance reviews will also be enhanced to include more on these expectations.

OIG Position

We accept APHIS' management decision.

Finding 2: SITC’s Market Surveys Do Not Efficiently Identify Prohibited Products

Approximately 90 percent of SITC’s key function—market surveys—were not successful at either seizing a product or generating a trace back to the importer during fiscal year (FY) 2008 through FY 2011. Of approximately 113,000 market surveys performed during this period, only about 11,000 (10 percent) were successful in identifying new pathways for the illegal entry of prohibited products. The Deputy Administrator in charge of SITC stated that this rate was surprisingly low given SITC’s mission. This occurred, in part, due to SITC’s management not providing sufficient guidance and direction in performing market surveys. Instead, SITC management established a policy that allows officers to independently select, using their own judgment, where and when to perform market surveys. SITC management also did not require their officers to use specific methods, such as cooperating with other agencies and varying the location and timing of market surveys, which could increase their success rate. In addition, SITC did not hold its managers and supervisors accountable since it did not require them to review their officers’ procedures for market selection, or analyze their effectiveness in identifying new pathways for prohibited products. As a result of inefficient market selection strategies, there is an increased risk that prohibited products that already entered the United States would not be detected by SITC officers and introduce plant disease and pests that could devastate forests and agriculture.

The *Reference Guide* suggests, but does not require that its officers cooperate with other agencies, such as CBP and the PPQ plant inspection stations, when determining which new markets to target.²² The guide also suggests that officers vary the timing of their marketplace visits. We determined that one field office we visited that followed the suggestions in the *Reference Guide* was nearly three times as effective in seizing prohibited products or in generating traces.

We analyzed SITC officers’ performance data and compared the number of market surveys to the number of seizures and traces generated from those market surveys for all 58 office locations nationwide. Our analysis showed that 4 offices, which applied some of the suggestions listed in the *SITC Reference Guide*, had seized or generated traces for prohibited products in 20 percent or more of the markets they visited. However, the remaining 54 offices were not as successful, with 30 of those 54 offices being successful in only 10 percent or fewer of the markets visited. For 14 of those 30 offices, we determined that officers identified prohibited products or generated traces in only 5 percent or fewer of the markets visited. Overall, our analysis showed that the SITC offices that cooperated with other agencies, or which varied the location and timing of their visits were 100 percent more effective in identifying new pathways for prohibited products than the SITC offices that did not implement the suggestions listed in the *SITC Reference Guide*.

We determined that the main reason for this disparity was the methods SITC personnel used to select the markets they surveyed. SITC management said that they allow officers to determine their own work load and timing of visits because they are more familiar with the local markets.

²² *SITC Reference Guide*, dated November 2009.

However, SITC management implemented this policy without reviewing the officers' market survey results to verify whether this approach was successful at identifying prohibited products or in generating traces.

Cooperation with PPQ and CBP

PPQ plant inspection stations maintain a wealth of data related to imported plant and plant product shipments, including the name and address of the importer, and type of product being brought into the country. These data lists also show the product's destination—essentially providing a resource for SITC officers to identify new markets that are potentially selling prohibited agricultural products. Yet at four of the six SITC offices we visited, officials did not inquire about the information PPQ maintains.

At two ports-of-entry, we obtained plant inspection station lists for the 6 months prior to our visits. We compared the importer names and destination addresses from the PPQ lists to the names and addresses where SITC officers performed their market surveys. SITC officers did not visit 213 of the 254 (84 percent) markets we identified from the plant inspection station information. Officers at these ports-of-entry confirmed that they did not visit these markets and told us they were not even aware that they existed. Supervisors and officers stated that they had not received specific guidance from management to obtain PPQ's importer list, and had not thought to obtain it themselves. Nonetheless, they agreed that obtaining and reviewing the PPQ list of importers would help them better target their market surveys.

Similarly, we found that three of the six offices we visited did not require their officers to talk to CBP officials who inspect imported shipments. According to SITC officials, CBP also maintains data on the importer and destination of imported products. We found that officers who worked with CBP officials on leads were up to three times more effective at identifying, seizing, or generating traces of prohibited products. For example, we visited two larger SITC offices, both located in major cities near busy air and sea ports-of-entry. One of these offices, which targeted its market survey selection based on information from CBP officials, was successful in approximately 27 percent of its market surveys. The other office, which did not obtain CBP information or target its market survey selections, was successful in only 8 percent of the market surveys it performed.

As some SITC offices have demonstrated, its officers can increase their success rates if they work with CBP to target their market selections. At two smaller offices, located well inland, a SITC office that obtained CBP information was able to identify a prohibited product or generate a trace in approximately 16 percent of its market surveys, while another office that did not use CBP information, was successful in less than 3 percent of its market visits.

Location and Timing of Visits

Location and timing of market visits also made a difference in success rates. Since SITC management did not require officers to use specified methods or follow best practices in making market selections, we found inconsistencies in both the type and frequency of

market visits. One SITC office, successful in about 27 percent of its markets visits, instructed its officers to not visit flower markets more than once or twice a year. The supervisor stated that, historically, they did not identify prohibited products at these locations and visiting them was a “waste of the officers’ time.” Instead, the supervisor directed his officers towards what he believed to be more high-risk markets. In contrast, another supervisor in another office instructed two officers to visit the same flower market 49 times between FY 2008 and FY 2010, because this “acted as a deterrent to smugglers.” Out of these 49 visits, only 1 seizure occurred. Overall, this office was successful in only 8 percent of its market surveys.

The *SITC Reference Guide* states that SITC officers should vary their market selections and timing of their visits—specifically mentioning weekends, evenings, holidays, and early morning hours—to maintain the element of surprise in their surveys. However, because this was a suggestion and not a requirement, we found that SITC officers performed a majority of their market surveys during regular business hours. We found that SITC officers rarely (approximately 4 percent of the time) conducted market surveys outside of normal business hours due to concerns with labor restrictions and a limited budget for overtime. Since nearly all market visits (96 percent) occurred during regular business hours, we were unable to compare the success rates of after-hours market visits. Still, while accompanying an officer in the field, we spoke with a known smuggler who has since become an informant to SITC. In the presence of the SITC officer, he explained that smugglers know to move their prohibited products during evenings, weekends, and holidays because they believe that the authorities predictably perform their inspections during regular business hours.

SITC management stated that analyzing an office’s effectiveness is an inherent part of being a manager and supervisor, and they expected such analyses were being performed. Thus, they did not implement procedures to require this. When we asked the SITC regional managers why they did not perform any analysis, they stated there are too many variables (i.e., relating to illegal activities) to allow them to assess the success of any particular office. While productivity rates may vary, we believe that some kind of measurement is possible, even if it involves simply comparing the existing rates across different offices. The PPQ Deputy Administrator believed that the low success rate was an indicator that local offices were not operating effectively, and that SITC needed to reconsider its procedures. She also stated that PPQ needed to think about redirecting SITC’s efforts to better identify new pathways for prohibited products, and she established a working group to report on a plan of action.

On February 8, 2012, the PPQ working group issued its suggested changes to improve SITC’s ability to identify new pathways for prohibited products. Based on our review of that report, we believe that the planned recommendations would significantly improve SITC’s effectiveness and oversight. By implementing the following recommendations, in conjunction with the working group’s plan of action, we believe that SITC can better ensure that it accomplishes its mission of identifying new pathways for prohibited products.

Recommendation 3

Establish minimum requirements and best practices to follow, such as working with and obtaining information from PPQ's Plant Inspection Station and CBP officials, when SITC officers select markets to visit.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that the newly formed Technical Working Group will analyze current data and identify patterns of prohibited product movement that present a tangible threat to U.S. agricultural and natural resources. APHIS will also examine the minimum requirements and best practices officers and their supervisors use now to select markets or other venues for survey or monitoring. In a subsequent emailed response on July 13, 2012, APHIS stated that, from that examination, APHIS will provide written guidance to officers on how to effectively select markets for survey to ensure APHIS is effectively monitoring and locating products in commerce that present a tangible risk to U.S. agriculture and natural resources. This work of revisiting practices will be done twice a year or more frequently as circumstances dictate. The list of priorities and guidance will be available for use by SITC personnel by October 31, 2012.

OIG Position

We accept APHIS' management decision.

Recommendation 4

Develop and implement oversight procedures for regional management and area supervisors to follow that will ensure their officers adhere to the new SITC requirements and best practices in selecting markets to visit.

Agency Response

In their response, dated June 29, 2012, APHIS officials stated that PPQ management now requires regional managers and supervisors to use the new checklists they implemented for FY 2012 to improve oversight, and to reinforce and explain current duties and expectations. PPQ management will also update and implement individual performance plans for employees that reference the new operational priorities and update program-wide benchmarks to reflect the new priorities by December 31, 2012.

OIG Position

We accept APHIS' management decision.

Recommendation 5

Develop and implement policies and procedures to require SITC managers and supervisors to obtain and utilize market survey activity analyses to determine their officers' effectiveness, and implement appropriate corrective actions if needed.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that it agreed with this recommendation and PPQ will develop a standard operating procedure (SOP) by December 31, 2012, to guide managers and supervisors in the use of market survey data, as well as data from other trace activities including mail and internet searches. PPQ management will then utilize SNICAS system reports to determine if officers are effectively identifying new or potential pathways for prohibited products and taking appropriate action to mitigate significant plant and animal health risks. In addition, PPQ management reinstated the SITC Quality Assurance Program (QAP) and conducted two work unit reviews earlier this year (April and May 2012) with more planned for FY 2013. The QAP reviews provide for an independent perspective on the effectiveness of SITC activities occurring in selected locations and a means to ensure operational procedures are executed consistently across work units and in accordance with established regulations, policies, and procedures.

OIG Position

We accept APHIS' management decision.

Finding 3: SITC Did Not Take Sufficient Action to Stop Imports of Higher-Risk Products

Although SITC has an established process to request that CBP close the pathways by which higher-risk products enter the country, it did not use this process for 96 percent of such higher-risk products identified by its market surveys during our period of review. Further, when it did take action to close pathways, SITC's officers did not make the recommended follow-up visits for 34 percent of the cases to ensure that the pathways remained closed. This occurred because SITC management relied on its officers to take the necessary actions, and did not establish specific requirements for them to follow once higher-risk prohibited products are identified in the marketplace. In addition, SITC did not require its supervisors to monitor their officers' work to verify that pathways were being closed as needed, or to ensure that officers returned to high-risk markets. Without following up on market seizures, there is an increased risk that the prohibited product will continue to be imported. For example, we found that SITC did not

follow-up on higher-risk snails (i.e., rams horn snails) that it seized during market surveys.²³ Over the next 16 months after this type of snail was first seized, other SITC officers continued to find the same type of snail at 22 different markets nationwide.

According to SITC management and the *Reference Guide*, when seizing a prohibited imported product, officers should work with their supervisors to determine whether they need to complete an Agricultural Request for Action (ARFA) form. The ARFA form alerts CBP officials at the ports-of-entry to prevent the import of future shipments of either the product or the importer, thus closing the pathway. The *Reference Guide*, which provides SITC officers with directions and instructions for performing their duties, does not describe the criteria to follow when determining whether to issue an ARFA, or when follow-up visits are needed to ensure that pathways remain closed.

We analyzed SITC data for all market surveys performed during FY 2008 through FY 2011, from a list of all product seizures made by SITC officers. From that list we eliminated all products listed as low-risk, because SITC management does not expect ARFAs for low-risk products such as soup mixes containing animal products from certain countries. While these are prohibited, they do not pose a serious threat to people or agriculture. SITC management instructed their officers to run a trace on these products, but to not waste their time in seizing them. We also eliminated any seizures related to interstate commerce, as these would not be imported products. From this, we derived a list of 2,037 higher-risk products seized during that time period. We then compared our list to the number of ARFAs, and found that SITC issued 80 ARFAs for higher-risk product over the last 4 years.²⁴ The remaining 1,957 higher-risk products could continue to be imported and thereby still pose a threat to U.S. agriculture if the plant or plant pests associated with those products get disseminated.

Issuing ARFAs

SITC guidance focused on how to handle low-risk products, and did not contain clear instructions to its supervisors on the ARFA process.²⁵ For example, SITC management provided a list of low-risk prohibited products, but did not maintain a similar list for higher-risk products. In addition, the *Reference Guide*—which officers use as their main source for guidance and instruction—does not have a section on how to close a pathway. A reference to the ARFA appears in the appendix of the *Reference Guide*, with instructions that officers “should” complete an ARFA when a prohibited product is found in commerce and making its way through the ports-of-entry undetected. However, we found that this vague language led to confusion among SITC supervisors.

During our office visits, we found inconsistencies between how different supervisors handled ARFAs. At one office, a supervisor only issued ARFAs when there is a national recall of a product. Another supervisor stated an ARFA should only be completed when a product poses a nationwide risk. A third supervisor informed us that he does not

²³ APHIS considers snails an invasive species, and therefore a higher-risk, because they reproduce rapidly and can decimate plant cover.

²⁴ SITC did issue ARFAs for low risk products, but these were not part of our analysis.

²⁵ *SITC Reference Guide*, dated November 2009, and memorandum on SITC Regulatory Enforcement of Low Risk Animal Products in Commerce, dated September 17, 2010.

complete ARFAs because he has problems getting them timely processed through SITC headquarters.

In general, officers rarely completed ARFAs even when they continued to seize similar higher-risk imported prohibited products at other markets, as in the case of the snails. We note that some snail species (i.e., the giant African snail) have been known to eat not just vegetation, but also building materials. A snail infestation can take years to eradicate and cost millions of dollars if undetected.²⁶ SITC management officials stated that they trust their officers to determine when to complete an ARFA, but acknowledged that they could improve their guidance and oversight of the ARFA process. Without reviewing each case, they said that they are unable to determine whether an ARFA should have been issued for the 1,957 higher-risk products.

Conducting Follow-ups

SITC defines a high-risk market as one where products were previously seized.²⁷ SITC management also stated that the only way to measure whether an ARFA was effective is to re-visit the markets that had a previous seizure. However, program guidance did not require SITC officers to perform follow-up visits to these high-risk markets.

For all 80 ARFAs that were completed for higher-risk products, we identified the name of the market where the product was first seized and then reviewed all market surveys to determine if SITC officers revisited that market. Our analysis showed that SITC officers did not perform follow-up visits to 27 of the 80 markets (34 percent). We also determined that managers and supervisors often do not review their officers' workload, and therefore, would not know whether an officer revisited a market where an ARFA had originated.

PPQ and SITC management agreed that officers should have performed follow-up visits to these markets in order to measure the effectiveness of closing known pathways. While ARFAs can be used to close pathways for both high-risk and low-risk products, APHIS' Deputy Administrator for PPQ stated that SITC's ARFA policy was meant to ensure that ports-of-entry officials' did not waste their time looking for low-risk products. However, we note that this policy does not address the higher-risk products discussed in this finding. The Deputy Administrator also stated that, based on OIG's description of the findings, SITC needs to rethink how it does its work. During our fieldwork, PPQ established a working group to review and assess SITC operations. On February 8, 2012, the PPQ working group published a plan of action, with full implementation planned by March 2013.

As documented in its action plan, PPQ's working group concluded that SITC officers need clear guidance and direction on how and when to initiate the process for closing pathways. Additionally, supervisors need procedures for reviewing all higher-risk product seizures to decide if an ARFA is necessary. Finally, to ensure that a pathway is closed after issuing an

²⁶ APHIS New Pest Response Guidelines, *Giant African Snails: Snail Pests in the Family Achatinidae*, dated April 23, 2007.

²⁷ *SITC Reference Guide*, Chapter 5, *Procedures – Commerce Sites*, page 5-2-1, dated November 2009.

ARFA, SITC must require officers to perform a follow-up survey. We agree with the working group's conclusions.

Recommendation 6

Review the 1,957 seizures made by SITC officers to identify those that still need follow-up, and issue ARFAs as needed, to close the pathways by which higher-risk prohibited products entered the country. Require follow-up visits at those markets to ensure those imported higher-risk products are not still entering the United States.

Agency Response

On June 29, 2012, APHIS officials responded that they agreed with this recommendation and will follow up, as needed and appropriate, on those 1,957 seizures that fall into their new category of high risk. In a subsequent response emailed on July 18, 2012, APHIS officials stated that they will have a determination on the 1,957 seizures and what needs to be done for follow-up by December 31, 2012. The follow-up will be completed by March 31, 2013.

OIG Position

We accept APHIS' management decision.

Recommendation 7

Clarify and strengthen SITC instructions on closing pathways, particularly the procedures that an officer must follow to determine if and when to initiate the process to close a known pathway of higher-risk prohibited products.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that they agreed with this recommendation and PPQ released an updated SOP that provides a clear and systematic process for developing, reviewing, and issuing an ARFA to CBP. PPQ will finalize a list of operational priorities based on risk analysis and communicate those expectations and provide guidance to State Plant Health Directors and SITC managers, supervisors, and field personnel. The SOP will include guidance to further clarify what actions to take in response to products and pathways that are determined to be high risk and also what actions to take in response to products and pathways that are determined to present lower levels of risk. Additionally, by October 31, 2012, PPQ will finalize a list of operational priorities based on risk analysis and communicate expectations to SITC personnel.

OIG Position

We accept APHIS' management decision.

Recommendation 8

Establish specific procedures that require SITC officers to perform follow-up surveys at markets from which higher-risk prohibited products were identified and seized.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that they will provide new SOPs by December 31, 2012, for SITC personnel to use when performing follow up surveys at higher-risk markets.

OIG Position

We accept APHIS' management decision.

Recommendation 9

Establish a procedure for SITC supervisors to ensure that an ARFA is issued for every higher-risk imported product seized or a justification for why an ARFA was not issued. Include a method for supervisors to confirm that the pathway listed on that ARFA was closed.

Agency Response

On June 29, 2012, APHIS officials responded that they agreed with this recommendation and already published, on May 7, 2012, an SOP with new guidance on issuing ARFAs. SITC supervisors will be able to confirm that an ARFA was issued or not, and if not, why not. Additionally, SITC supervisors will be required to periodically survey markets to ensure that previously identified pathways have been closed.

OIG Position

We accept APHIS' management decision.

Finding 4: SITC Lacks Controls Over Its IT System and Related Data

SITC used an unapproved IT system to record its program activities and report its accomplishments. Specifically, SITC did not ensure its IT system went through the required Certification and Accreditation (C&A) process, which ensures that a new system is secure and contains reliable data. The system also contained unsupported field data that was not reviewed by supervisors for accuracy. This occurred because APHIS management, who are responsible for ensuring that all systems undergo a C&A, relied upon program staff to notify them of new systems. Since SITC never informed them of the system's introduction, they did not know it existed for at least 3 years. In addition, SITC did not put in place oversight and data controls, such as second party reviews or standardized reports, to ensure accurate and supportable data was entered into and derived from its IT system. As a result, when APHIS reported SITC's FY 2010 accomplishments to Congress, it overstated the number of violations SITC recommended by 106 percent.²⁸ In addition, until SITC completes the C&A process, there is reduced assurance that its IT system is secure from unauthorized access or dissemination of data.

In 2006, SITC implemented an IT system that its officers use to enter the results of their market surveys, including importer violations of prohibited products. Federal requirements²⁹ and Department of Agriculture (USDA) Directives³⁰ for IT systems require that new systems go through a C&A process, and that an agency establish the controls necessary to achieve effective and reliable reporting. The C&A process becomes even more important in SITC's case, as its IT system contains personally identifiable information and sensitive information obtained from other Federal agencies.

Due to the seriousness of this issue, we issued a Fast Report in April 2011 that recommended APHIS immediately notify USDA's Chief Information Officer of an unauthorized system and begin the C&A process.³¹ Subsequent to that report, we found that SITC management did not have sufficient controls to ensure the reliability of data it recorded and reported to APHIS management.

Data Recording and Reporting

All six offices we visited did not maintain documentation of the results of their market surveys. Instead, the officers entered the results of their market surveys directly into the IT system. This was in accordance with SITC management's direction to reduce the paperwork collected and maintained by its officers. While we understand SITC's intention, we found that there were no compensating controls, such as adequate supervisory oversight of officers' market surveys performed to ensure the information entered into its IT system was accurate and complete. We found that three of the five

²⁸ APHIS' FY 2012 Budget Explanatory Notes (justifications of proposed funding changes for FY 2012 as well as explanations of ongoing programs).

²⁹ OMB Circular A-130, Appendix III, dated November 28, 2000, and *Federal Information Security Management Act of 2002*.

³⁰ Departmental Manual 3555, *Certification and Accreditation of Information Systems*, dated October 18, 2005.

³¹ Fast Report 33601-0012-Ch (1), *APHIS Needs to Establish Better Controls Over Information Systems*, dated April 7, 2011.

SITC supervisors we interviewed did not keep track of their officers' workload or require their officers to inform them of the market surveys they planned to perform or the results of those surveys.³² Since the supervisors were not aware of the markets their officers planned to visit, they were unable to conduct spot checks, either by physically visiting markets or reviewing the data entered into the IT system, to verify the officers' market survey results. Due to the lack of documentation and oversight, SITC supervisors were unable to provide any assurance on the accuracy of the information in SITC's IT system.

SITC also did not have documented procedures to ensure program reports obtained from its IT system were accurate, supported, and consistent. Program staff informed us that each time SITC needs an IT system report, an analyst runs a custom query of the system database. However, these custom queries were not done consistently across offices because SITC did not establish a methodology for gathering its reporting data. We also found that SITC did not have documented procedures to require a second party review of system reports.

Using these inconsistent query methods, SITC created a report on the number of violations they referred to APHIS' Investigative Enforcement Services (IES) Division. Without a second party review in place to ensure the report data was accurate, SITC overstated its FY 2010 accomplishments to APHIS management. The report showed that SITC recommended 317 violations to IES, even though SITC data recorded 154 violations recommended—an overstatement of 106 percent. APHIS management then used that report for inclusion in APHIS' annual budget report to Congress. After its release, we requested the same report from the IT system, however SITC officials were unable to recreate the same accomplishment report or provide support for the number of violations reported. SITC officials attributed the problem to a clerical error, but we believe it could also be attributed to the lack of adequate second party reviews and to the other issues as cited above.

Data Security

APHIS' Information Technology Division (ITD) was not aware that SITC developed and implemented a new system in 2006, because SITC never informed them that the system existed. APHIS' ITD is responsible for ensuring all new IT systems are reviewed for security requirements through the C&A process.³³ The C&A process is meant to assure, among other things, that a system is not vulnerable to unauthorized use or data dissemination. ITD staff informed us that they did not have an automated tool to search all APHIS' servers to detect the implementation or use of a new IT system. Instead, ITD relied upon program staff to notify them before a new system is implemented. PPQ management said that they did not inform APHIS' ITD because the system was developed "in-house" and, therefore, did not think the C&A process was required. Thus, SITC has no assurance that its data is secure from unauthorized use or dissemination.

³² Two of the offices we visited were under the same supervisor.

³³ Federal Information Processing Standards Publication 200, *Minimum Security Requirements for Federal Information and Information Systems*, dated March 2006.

In APHIS' response, dated April 14, 2011, to our Fast Report, ITD staff agreed to immediately notify USDA's Office of the Chief Information Officer about the system and complete the C&A process. ITD staff also agreed to review all of APHIS' network servers to develop a complete inventory of IT systems and prevent the further use of any unapproved systems. In November 2011, PPQ management informed us that they started the C&A process but were behind schedule. The PPQ Deputy Administrator explained that she had had discussions regarding whether SITC should keep the current system or merge it with another system that is already approved. While this could be a viable solution, until the C&A process is complete or a decision is made to eliminate it, the system is still not secure and remains vulnerable to unauthorized access and data dissemination.

In discussions with PPQ and SITC management, they agreed that SITC needs to implement greater oversight over its officers and the data they enter into its IT system, and noted that PPQ had established a working group to improve SITC's supervisory oversight. They also stated that SITC is in the process of drafting new procedures to ensure the accuracy of its data. The PPQ Deputy Administrator agreed that SITC was unable to replicate the data reported to Congress, and said that in the future it will document the methodologies used to generate system reports.

On February 8, 2012, PPQ issued its working group report to improve SITC's supervisory oversight and data integrity. The working group recommended that SITC develop written standard operating procedures for SITC supervisors, officers and analysts to follow in entering and reviewing data in its IT system. With the implementation of the following recommendations, in conjunction with PPQ's planned actions, we believe that SITC will be able to more effectively manage its workforce and accurately report its accomplishments.

Recommendation 10

Immediately notify the USDA's Chief Information Officer about the existence of SITC's IT system, complete the C&A process, and implement interim procedures to protect data until the process is complete.

Agency Response

In APHIS' response to the Fast Report, dated April 14, 2011, agency officials concurred with the recommendation and stated that APHIS' ITD has already notified USDA's Chief Information Officer (OCIO) regarding the existence of SITC's IT system. Specifically, the IT system was included in the APHIS Enterprise Data Center Migration Plan submitted to the OCIO on March 23, 2011, and a Unique Project Identifier number was requested from OCIO on April 1, 2011, so that the new IT system could be recognized as part of APHIS' IT portfolio. APHIS officials also stated that its ITD will continue to work with the Department to complete the C&A process which, as of June 2012, was with the OCIO awaiting final clearance. APHIS officials further stated that they had established, in October 2006, control procedures to protect the data, restrict

access, and monitor account access every 6 months and deactivate an account when a user leaves SITC.

OIG Position

We accept APHIS' management decision.

Recommendation 11

Require IT department staff to review APHIS' servers to identify unauthorized systems until APHIS can implement an automated tool to prevent and detect new systems. If such systems are found, either remove the systems or complete the certification and accreditation process.

Agency Response

In APHIS' response to the Fast Report, dated April 14, 2011, agency officials concurred with the recommendation and stated that APHIS' ITD will review all APHIS servers using their current network scanning tools to develop a complete inventory of systems and identify any unauthorized systems, by April 30, 2011. As part of this process, ITD will work with the APHIS IT Leadership Advisory Committee and further direct the program units to report all servers and systems that have not been previously identified. This will be completed by June 30, 2011. After this date, any systems that are "discovered" by ITD that have not been previously identified will be removed from the network. ITD will continue to evaluate existing tools to determine what automated processes can be implemented to detect new systems. Further, ITD will evaluate the costs and deployment timelines for additional tools that could be used to provide an automated process to detect and restrict the deployment of new servers and systems within APHIS. Additionally, ITD is currently in the process of refining the existing software approval process by updating its SOPs to more clearly indicate the roles and responsibilities of program units and ITD staff in the requesting, approving and deployment of new IT systems.

In a subsequent emailed response on July 24, 2012, APHIS officials stated that APHIS ITD worked in conjunction with the APHIS IT Leadership Advisory Committee to review all existing systems within APHIS and found no unauthorized IT systems requiring C&A or removal from the network. APHIS officials further stated that APHIS purchased the Trustwave Security Information and Event Management system (SIEM). This appliance will allow APHIS to centrally store logs from various applications and operating systems; create filtering and alerting rules; and report in real time the security status or compliancy state of any system included in the SIEM project. The SIEM has been installed and is currently in the process of being fine-tuned to ensure reports and alerts are configured properly. APHIS is building use-cases based on system/application type to make certain all relevant data is logged and sent to the SIEM. This includes system servers, security devices and networking components. Standard Operating Procedures are being drafted to define roles and responsibilities for IT Staff. The use of this tool will allow APHIS to monitor the APHIS network and alert ITD to unusual activity that could be

the result of an unauthorized system. This tool is scheduled for implementation for by the end of FY 2012.

OIG Position

We accept APHIS' management decision.

Recommendation 12

Implement policies and procedures to ensure that accurate data is entered into SITC's IT system by its officers, and subsequently verified by their supervisors.

Agency Response

In APHIS' response, dated June 29, 2012, agency officials stated that it agreed with this recommendation and already added a data integrity and quality control report feature to SITC's IT system. The report feature allows supervisors to query the system for recently added data (by work unit during a specific time frame) in the following categories: locations added; surveys conducted; seizures; traces issued; traces received; and traces closed. In addition, PPQ management has directed its IT unit to develop a check-box function, similar to the one in its Work Accomplishments Database system to ensure that supervisors acknowledge when they have reviewed their officers' data for accuracy. A new SOP on data integrity and quality control for the IT system will be issued for all users by October 31, 2012, with additional details on supervisors' responsibilities.

OIG Position

We accept APHIS' management decision.

Recommendation 13

Implement policies and procedures to ensure APHIS analysts document the methodology used in generating system reports to ensure consistency. Create additional procedures to verify the accuracy of those reports through a second party review to ensure the data is accurate and supported.

Agency Response

On June 29, 2012, APHIS officials responded that they agreed with this recommendation and the PPQ Deputy Administrator has formed a team to develop a strategy to consolidate operational analytical resources (systems and personnel) in a centralized analytical unit. This effort will result in the development of standard analytical methodologies and consistent and accurate analytical reports that address PPQ's highest mission priorities. In a subsequent emailed response on July 12, 2012, APHIS officials confirmed that the methodologies will be completed by the end of FY 2013. PPQ will also issue a SOP by December 31, 2012, on data integrity and quality control for the IT system database, with additional details on supervisors' responsibilities. All supervisors will review reports and identify any anomalies that would indicate inconsistencies in the data and resolve them.

The Technical Working Group tasked with establishing operational priorities for SITC will, by October 1, 2012, work in a collaborative manner with any analysts designated to support SITC. This Technical Working Group will continue to work after its initial priorities and guidance are developed to request standard queries of data systems and analyses reports that will be used to continuously refine SITC' s focus.

OIG Position

We accept APHIS' management decision.

Scope and Methodology

Our audit covered SITC activities that occurred from FY 2008 through FY 2011. We performed our audit at APHIS' PPQ and SITC Headquarters in Riverdale, Maryland, the western regional office in Fort Collins, Colorado, and the eastern regional office in Raleigh, North Carolina. We judgmentally selected 6 of the 58 SITC field offices to visit in Arizona (1), California (1), Connecticut (1), Florida (2), and New York (1) between March and May 2011. We also contacted five SITC managers and supervisors responsible for the States of Nebraska, Iowa, Ohio, Pennsylvania and Tennessee. We conducted our audit fieldwork from October 2010 through February 2012.

According to reports prepared by SITC's program analysts, between FY 2008 through FY 2011 there were over 113,000 market surveys performed by approximately 100 SITC officers nationwide. Based on those market surveys, SITC officers seized about 6,600 prohibited products. We determined that 2,037 were related to higher-risk imported products. Those market surveys also generated over 15,000 traces to the importer or subsequent customer. The products seized and traces generated resulted in approximately 80 ARFAs for higher-risk pathways and led to over 600 violations recommended to IES for prosecution.

We used information from SITC's IT database system for choosing field offices to review and performing our analysis as presented in this report. Although our limited testing did not disclose any issues with the reliability of the information on the number of seizures and violations, SITC did not maintain support for the number of surveys or traces they performed. Due to the lack of system security, data controls, and oversight, we do not provide any assurance on SITC's IT system or the data maintained within that system.

To accomplish our audit objectives, we:

- Interviewed APHIS PPQ and SITC Headquarters officials to determine SITC's roles and responsibilities related to detecting imported prohibited agricultural products;
- Reviewed and assessed the effectiveness of regulations, guidance and instructions provided to SITC officers and other personnel involved in the SITC unit;
- Assessed SITC's coordination with IES in prosecuting importers of prohibited products, as well as obtaining information from PPQ plant inspection stations and CBP officials stationed at the ports-of-entry;
- Evaluated program priorities and other resources used to carry out SITC's mission;
- Accompanied SITC officers during their planned market surveys at 47 neighborhood markets, distribution centers, and commercial warehouses;
- Evaluated the results of prior APHIS PPQ audits (i.e., OIG and GAO) and agency reports (i.e., APHIS' Quality Assurance Reviews and annual budget reports);

- Reviewed IES cases of unlawful entry and domestic distribution of prohibited foreign agricultural products to determine SITC's involvement and assistance with IES cases and the prosecution of violations;
- Interviewed APHIS' IT division staff and reviewed USDA's warehouse of approved IT systems for APHIS; and
- Analyzed SITC's IT system database to determine the reliability, quality, completeness and reasonableness of data. Although our initial testing of the data did not reveal any significant data reliability issues, we stopped all testing due to the risks associated with the system not having the C&A process completed by APHIS' IT division.

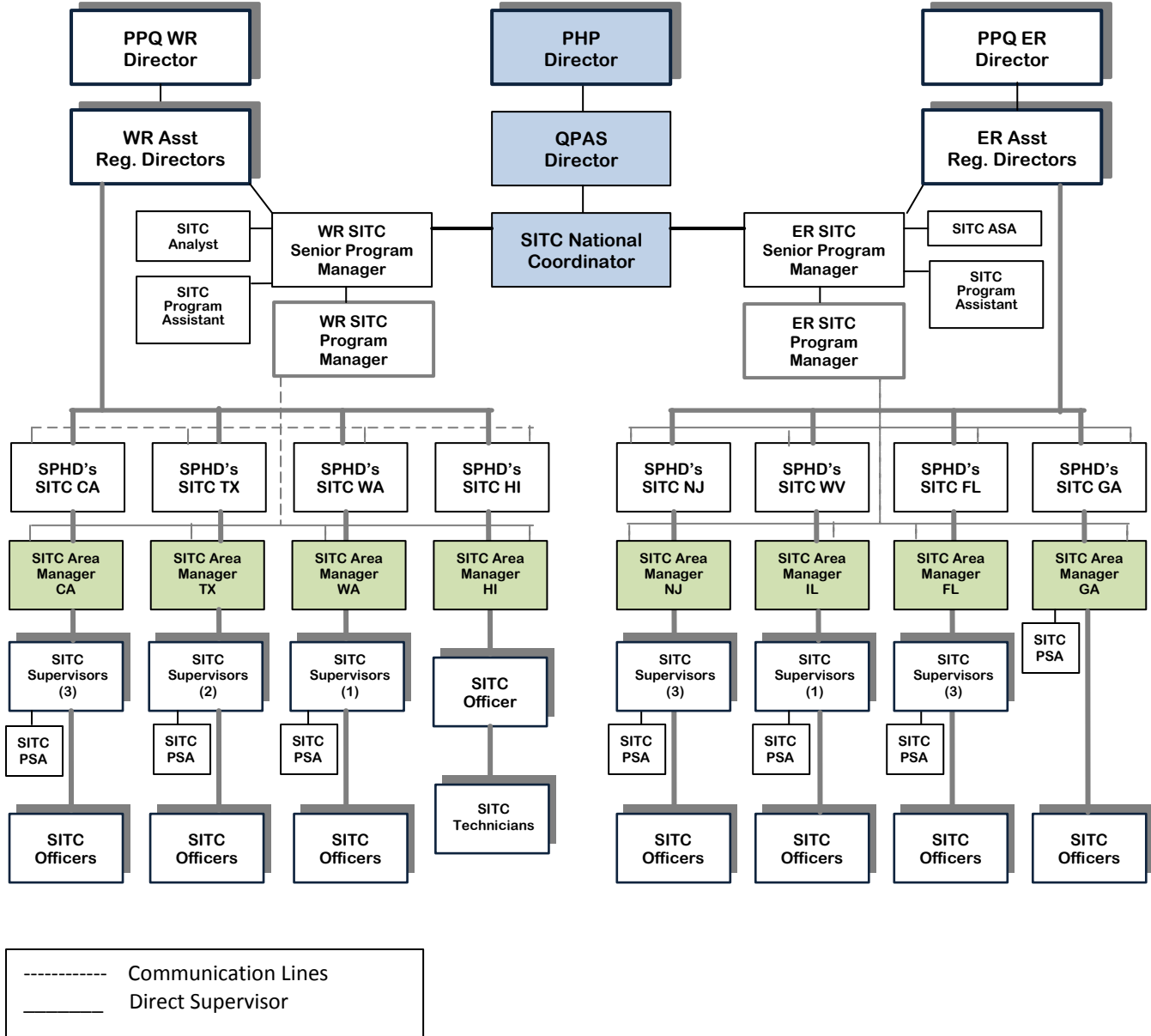
We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.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

Abbreviations

APHIS	Animal and Plant Health Inspection Service
ARFA	Agricultural Request for Action
C&A	Certification and Accreditation
CBP	Customs and Border Patrol
DHS	Department of Homeland Security
FY	Fiscal Year
GAO	Government Accountability Office
IES	Investigative and Enforcement Services
IT	Information Technology
ITD	Information Technology Division
OCIO	Office of the Chief Information Officer
OIG	Office of Inspector General
OMB	Office of Management and Budget
PPQ	Plant Protection and Quarantine program
QAP	Quality Assurance Program
QAR	Quality Assurance Review
SEIM	Trustwave Security Information and Event Management system
SITC	Smuggling, Interdiction, and Trade Compliance
SOP	Standard Operating Procedure
U.S.	United States
USDA	Department of Agriculture

Exhibit A: SITC National Organizational Chart¹

SITC National Organizational Chart



¹ SITC Reference Guide, Ch. 2, Program Organization, p. 2-1-3, dated July 2007.

**USDA'S
ANIMAL AND PLANT HEALTH
INSPECTION SERVICE
RESPONSE TO AUDIT REPORT**



June 29, 2012

United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Washington, DC
20250

MEMORANDUM

TO: Gil H. Harden
Assistant Inspector General
for Audit

FROM: Kevin Shea /s/
Acting Administrator

SUBJECT: APHIS Response and Request for Management
Decisions on OIG Report, "Effectiveness of the Smuggling,
Interdiction, and Trade Compliance Unit" (33601-12-CH)

Thank you for the opportunity for APHIS to review and comment on the Draft Report for the above titled audit. APHIS appreciates the audit, and has undertaken several self-initiated actions to improve the vital function of our Smuggling, Interdiction, and Trade Compliance (SITC) Unit, as well as address the Recommendations in the OIG Report.

Recommendation 1: Implement clear benchmarks and expectations for SITC field staff that will improve the programs' effectiveness in meeting its mission objectives, and require SITC managers and supervisors to exercise sufficient oversight to ensure that the unit's mission is effectively achieved.

APHIS Response: APHIS agrees with this Recommendation. To ensure SITC activities are focused on finding and mitigating significant plant and animal health risks not intercepted by Agriculture Quarantine Inspection (AQI) operations at ports of entry, Plant Protection and Quarantine (PPQ) management formed a Technical Working Group to analyze current data and identify patterns of prohibited product movement that present a tangible threat—a threat that poses a high risk of pests entering the country, becoming established, and causing economic harm to U.S. agricultural and natural resources.

The Technical Working Group will have approximately 90 days (June to August 2012) to produce an initial list of targeted national, regional and local priorities and products on which SITC personnel should focus. The Technical Working Group will develop guidance to aid SITC personnel in making risk-based decisions. PPQ management anticipates that the list of priorities and practical guidance will be available for use by SITC personnel by October 31, 2012. PPQ management will review the output of the Technical Working Group, along with recently updated performance measures to establish clear benchmarks and expectations by October 31, 2012.



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In addition, all of PPQ, including SITC, is undergoing a major organizational restructuring¹ that will clarify reporting lines and strengthen supervisory oversight. The SITC Management Team represents three areas: Headquarters (National Coordinator), and the Eastern and Western Regions (Regional Program Managers). However, as a result of the restructuring, expected to be completed by October 1, 2012, and based on recommendations from the SITC Board,² SITC national program management, and field program staff, will be organized wholly under PPQ's new Field Operations functional area. Also as a part of this restructuring, SITC field personnel will be managed by the State Plant Health Director in their home state. This model is successfully used by other programs in PPQ and will give State Plant Health Directors an increased role not only in determining AQI priorities for their state but also in directing the activities of all personnel funded through AQI user fees, including PPQ SITC personnel. These changes should greatly simplify national coordination, eliminate barriers to communication, and ensure effective oversight of the program.

For a description of action items and targeted due dates of key milestones for the SITC program, see the Action Plan in response to Recommendation 2.

Recommendation 2: Develop a time-phased action plan to implement the recommendations of the already-established working group, including procedures for PPQ and SITC upper management to periodically review reports of SITC's effectiveness at meeting established benchmarks and expectations.

APHIS Response: APHIS agrees with this Recommendation. We have developed a time-phased Action Plan to implement changes to the SITC program. The action items are detailed in the chart below:

¹ PPQ will be restructured under three Core Functional Areas: Field Operations, Policy and Management, and Science and Technology.

² The SITC Board was established January 2, 2012 with the responsibilities of providing day-to-day national leadership of the SITC program, overseeing the immediate changes made by the SITC Working Group in response to OIG's initial feedback, and providing guidance over the next six months (January to June, 2012) on how to bring SITC in line with other PPQ efforts centering around modernization, and maximizing the use of diminishing resources.

ACTION PLAN for IMPLEMENTATION of CHANGES to the SITC PROGRAM

ACTION ITEM	DUE DATE
<ul style="list-style-type: none"> Conduct quality assurance reviews of two work units. 	Completed May 10, 2012
<ul style="list-style-type: none"> Alert the SITC workforce of impending organizational and operational changes. 	Completed May 25, 2012
<ul style="list-style-type: none"> Create a transition team to carry on the SITC Board's work into the new fiscal year 	July 16, 2012
<ul style="list-style-type: none"> Notify APHIS Labor Management Relations and the employee unions of impending organizational and operational changes. 	August 31, 2012
<ul style="list-style-type: none"> Finalize list of operational priorities based on risk analysis completed by the Technical Working Group and communicate expectations and guidance to State Plant Health Directors and SITC personnel. 	October 31, 2012
<ul style="list-style-type: none"> Develop position descriptions for all reprogrammed supervisors and employees. Incorporate references to operational priorities in the FY13 plans. 	October 31, 2012
<ul style="list-style-type: none"> Review and revise all other SITC Position Descriptions and all individual performance plans. 	October 31, 2013
<ul style="list-style-type: none"> Begin to implement organizational and operational changes. 	October 31, 2012
<ul style="list-style-type: none"> Develop and implement SOPs regarding strategic use of market survey analyses and oversight of market survey activities. 	December 31, 2012
<ul style="list-style-type: none"> Finalize benchmarks and expectations to gauge effectiveness of program performance in light of new operational priorities. 	December 31, 2012
<ul style="list-style-type: none"> Provide training on new responsibilities for State Plant Health Directors who are now involved in the SITC program. This includes overview of the SITC National Information, Communication and Activity System (SNICAS). 	December 31, 2012
<ul style="list-style-type: none"> Conduct periodic quality assurance reviews of work units (at least two work units per year). 	October 1 2012 – September 30 2013
<ul style="list-style-type: none"> Conduct semi-annual performance reviews for employees (standard mid-year and annual reviews) [April 2012 completed]. 	September 2012, April 2013, September 2013
<ul style="list-style-type: none"> Work on updating and implementing training for PPQ field personnel as needed. This will include training for staff new to PPQ SITC, staff new to non-SITC PPQ work and staff who need refresher training for any PPQ work. 	September 2012–October 2013
<ul style="list-style-type: none"> Review all existing SITC documents (SOPs, guidance, etc.) and determine what needs to be updated to reflect new organizational structure and priorities. Create 	October 31, 2013

schedule to complete revisions and issue cancellations.	
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Recommendation 3: Establish minimum requirements and best practices to follow, such as working with and obtaining information from PPQ's Plant Inspection Station and CBP officials, when SITC officers select markets to visit.

APHIS Response: APHIS agrees with this Recommendation. The newly formed Technical Working Group, described in response to Recommendation 1, will analyze current data and identify patterns of prohibited product movement that present a tangible threat to U.S. agricultural and natural resources. The data will be gleaned from Plant Inspection Stations, APHIS' Emergency Action Notifications, CBP databases and other sources, such as PPQ's SNICAS system. The Technical Working Group will produce an initial list of targeted national, regional and local priorities and products on which SITC personnel should focus. The priorities will include markets and other potential risks. The list of priorities and guidance will be available for use by SITC personnel October 31, 2012. These priorities will be revisited and updated at least twice a year.

Recommendation 4: Develop and implement oversight procedures for regional management and area supervisors to follow that will ensure their officers adhere to the new SITC requirements and best practices in selecting markets to visit.

APHIS Response: APHIS agrees with this Recommendation. PPQ management developed and implemented checklists in FY 2012 to improve oversight. These checklists reinforce and explain current duties and expectations. PPQ management will also update and implement individual performance plans for employees that reference the operational priorities developed by the Technical Working Group by October 31, 2013 and update program-wide benchmarks to reflect the new priorities by December 31, 2012.

In addition, as stated in response to Recommendation 1, PPQ, including SITC, is undergoing a major organizational restructuring that will clarify reporting lines and strengthen supervisory oversight. This effort will move the management of SITC personnel under the State Plant Health Director in their state. This model is successfully used by other programs in PPQ and will give the State Plant Health Directors an increased role not only in determining AQI priorities for their state but also in directing the activities of all personnel funded through AQI user fees, including PPQ SITC personnel, to ensure effective and efficient state-level AQI operations. Interim guidance for supervisors was provided in April of 2012 in the form of checklists based on current position descriptions, and performance plans. Clear expectations for effective oversight will be written into performance plans for all SITC supervisors and managers by October 31, 2013. Supervisors and State Plant Health Directors with SITC responsibilities will be provided training by December 31, 2012.

Recommendation 5: Develop and implement policies and procedures to require SITC managers and supervisors to obtain and utilize market survey

activity analyses to determine their officers' effectiveness, and implement appropriate corrective actions if needed.

APHIS Response: APHIS agrees with this Recommendation. In addition to the steps outlined in response to Recommendations 1 through 4 (see especially the Action Plan in response to Recommendation 2) to enhance supervisory oversight and improve overall program performance, PPQ will develop a standard operating procedure (SOP) to guide managers and supervisors in the use of market survey data, as well as data from other trace activities including mail and internet searches, from the SNICAS system to determine if officers are effectively identifying new or potential pathways for prohibited products and taking appropriate action to mitigate significant plant and animal health risks. This SOP, which will be developed and implemented by December 31, 2012, will take into consideration the list of targeted national, regional, and local operational priorities developed by the Technical Working Group.

PPQ supervisors³ and State Plant Health Directors are in the best position to ensure that SITC officers are effective and to take corrective action with their officers when needed. In addition, PPQ management reinstated the SITC Quality Assurance Program (QAP) and conducted two work unit reviews earlier this year (April and May 2012). The QAP provide for an independent perspective on the effectiveness of SITC activities occurring in selected locations and a means to ensure operational procedures are executed consistently across work units and in accordance with established regulations, policies, and procedures. The QAP reviews are conducted by a team of PPQ employees and led by the PPQ National Quality Assurance Coordinator. More QAP reviews are planned for FY 2013.

Recommendation 6: Review the 1,957 seizures made by SITC officers to identify those that still need follow-up, and issue ARFAs as needed, to close the pathways by which higher-risk prohibited products entered the country. Require follow-up visits at those markets to ensure those imported higher-risk products are not still entering the United States.

APHIS Response: APHIS agrees with this Recommendation. As stated in the May 15, 2012 meeting with your staff, we will follow up on, as needed and as appropriate, those seizures within the 1,957 that fall into the new category of high risk. In a memo dated May 25, 2012, the PPQ SITC Board officially announced the decision (approved by the PPQ Deputy Administrator) to “refocus PPQ SITC efforts on detecting and mitigating the introduction or movement of high-risk products that present a tangible threat to US agriculture and natural resources.” In recent meetings, the PPQ Leadership Team⁴ defined “tangible threat” or high risk as the likelihood of pests entering the country, becoming established, and causing economic harm to U.S. agricultural and natural resources.

³ Under the new SITC structure, some SITC personnel will report directly to the State Plant Health Director in their State; others may report to a supervisor who reports to the State Plant Health Director. The particulars in each State will depend on the size of the workforce and staffing situation in each location.

As mentioned earlier, PPQ established a Technical Working Group to analyze current data and identify patterns of prohibited product movement that present a “tangible threat,” i.e., that pose a high risk of pests entering the country, becoming established, and causing economic harm to U.S. agricultural and natural resources. These pathways and products will become the primary focus for SITC (and other parts of PPQ as well). Previous SITC program documentation identified only certain lower risk products, which has caused ambiguity within the program about the significance of non-listed products and led to conclusions in and outside SITC that everything not identified as lower risk should be considered higher risk and merited follow-up. As mentioned in responses to previous Recommendations, the national, regional, and local operational priorities developed by the Technical Working Group will be implemented by October 31, 2012.

PPQ acknowledges that this shift in focus may appear to contradict our regulations that are predicated on the idea that a prohibited product is a risky product. To clarify, all prohibited products will continue to be seized. However the determination to take further action – including investigatory traces or the issuance of Agricultural Request for Action (ARFAs) – will be predicated on the plant and animal pest or disease risk presented by the situation.

In terms of closing pathways, on May 7, 2012, PPQ released an updated SOP that provides a clear and systematic process for developing, reviewing, and issuing an ARFA to Customs and Border Protection (CBP). The ARFA SOP details the responsibility each party has in the preparation, review, and issuance of an ARFA, to include the specific time frames for the completion of each step of the process. This streamlined operational change will ensure that appropriate and timely actions to mitigate harms associated with higher risk products and pathways are consistently taken by SITC, including informing CBP of the need to close a specific pathway.

Recommendation 7: Clarify and strengthen SITC instructions on closing pathways, particularly the procedures that an officer must follow to determine if and when to initiate the process to close a known pathway of higher-risk prohibited products.

APHIS Response: APHIS agrees with this Recommendation. As mentioned in the response to Recommendation 6, PPQ released an updated SOP that provides a clear and systematic process for developing, reviewing, and issuing an ARFA to CBP.

¹ The PPQ Leadership Team is composed of the Senior Leaders of each major PPQ program area, including the Deputy Administrator’s office; the Center for Plant Health Science and Technology; the Eastern and Western Regional Offices; Emergency and Domestic Programs; Plant Health Programs; the Professional Development Center; and Resource Management and Planning Services

Since the implementation of this SOP on May 7, 2012, PPQ has issued 14 ARFAs to CBP – a significant increase since only 80 ARFAs were issued in the previous 4 years. Additionally, by October 31, 2012, PPQ will finalize a list of operational priorities based on risk analysis completed by the Technical Working Group and communicate expectations and provide guidance to State Plant Health Directors and SITC personnel. This will include guidance to further clarify what actions to take in response to products and pathways that are determined to be high risk and also what actions to take in response to products and pathways that are determined to present lower levels of risk.

Recommendation 8: Establish specific procedures that require SITC officers to perform follow-up surveys at markets from which higher-risk prohibited products were identified and seized.

APHIS Response: APHIS agrees with this Recommendation. We will provide the suggested guidance to SITC personnel in the SOP described in Recommendation 5.

Recommendation 9: Establish a procedure for SITC supervisors to ensure that an ARFA is issued for every higher-risk imported product seized or a justification for why an ARFA was not issued. Include a method for supervisors to confirm that the pathway listed on that ARFA was closed.

APHIS Response: APHIS agrees with this Recommendation, which is addressed by the ARFA SOP, issued May 7, 2012 and described in Recommendation 6. SITC supervisors will be able to confirm that an ARFA was issued or not, and if not, why not. Additionally, APHIS will periodically survey markets to ensure identified pathways have been closed.

Recommendation 10: Immediately notify the USDA's Chief Information Officer about the existence of SITC's IT system, complete the C&A process, and implement interim procedures to protect data until the process is complete.

APHIS Response: In APHIS' response to the Fast Report, dated April 15 2011, agency officials concurred with the recommendation, stating that APHIS' Information Technology Division (ITD) has already notified the USDA Office of the Chief Information Officer (OCIO) regarding the existence of SITC's IT system (SNICAS). Specifically, SNICAS was included in the APHIS Enterprise Data Center Migration Plan, submitted to the OCIO on March 23, 2011, and a Unique Project Identifier number was requested from OCIO on April 1, 2011, so that SNICAS could be recognized as part of the APHIS portfolio. APHIS also stated that its ITD will continue to work with the Department to complete the C&A process (as of June 2012, the package is currently with OCIO awaiting final clearance). APHIS further stated that in October 2006, it established control procedures to protect the data, restrict access, monitor account access every 6 months, and deactivate an account when a user leaves PPQ SITC.

OIG Position: We accept APHIS' management decision.

Recommendation 11: Require IT department staff to review APHIS' servers to identify unauthorized systems until APHIS can implement an automated tool to prevent and detect new systems. If such systems are found, either remove the systems or complete the certification and accreditation process.

APHIS Response: In APHIS' response to the Fast Report, dated April 15, 2011, agency officials concurred with the recommendation, stating that APHIS' ITD will review all APHIS servers, using the network scanning tools that we have available at this time to develop a complete inventory of systems and identify any unauthorized systems by April 30, 2011. As part of this process, ITD will work with the APHIS IT Leadership Advisory Committee and further direct the program units to report all servers and systems that have not been previously identified. This will be completed by June 30, 2012. After this date, any systems that are "discovered" by ITD that have not been previously identified will be removed from the network. ITD will continue to evaluate existing tools to determine what automated process can be implemented to detect new systems. Further, ITD will evaluate the costs and deployment timelines for additional tools that could be used to provide an automated process to detect and restrict the deployment of new servers and systems within APHIS. Additionally, ITD is currently in the process of refining the existing software approval process by updating the current Standard Operating Procedures to more clearly indicate the roles and responsibilities of the program units and ITD in the requesting, approving, and deployment of new systems.

OIG Position: We accept APHIS' management decision.

Recommendation 12: Implement policies and procedures to ensure that accurate data is entered into SITC's IT system by its officers, and subsequently verified by their supervisors.

APHIS Response: APHIS agrees with this Recommendation. In February 2012, a data integrity and quality control report feature was developed and programmed into the SNICAS system. The report feature allows supervisors to query the **system** for recently added data (by work unit during a specific time frame) in the following categories: locations added, surveys conducted, seizures, traces issued, traces received, and traces closed. In addition, PPQ management has directed its IT unit to develop a check-box function, similar to the one in the Work Accomplishments Database (WADs) to ensure that supervisors acknowledge when they have reviewed their officers' data for accuracy. The programming work should be done by August 31, 2012. A new SOP on data integrity and quality control for the SNICAS system will be issued for all SNICAS users, with additional details on supervisors' responsibilities, effective by October 31, 2012.

Recommendation 13: Implement policies and procedures to ensure APHIS analysts document the methodology used in generating system reports to ensure consistency. Create additional procedures to verify the accuracy of those reports through a second party review to ensure the data is accurate and supported.

APHIS Response: APHIS agrees with this Recommendation. In an effort to enhance data analysis activities used by PPQ to inform program strategy and operations, the PPQ Deputy Administrator has formed a team to develop a strategy to consolidate operational analytical resources (systems and personnel) in a centralized analytical unit. This effort will result in the development of standard analytical methodologies and consistent and accurate analytical reports that address PPQ's highest mission priorities. The team has begun work as of June 12, 2012 but there is no timetable yet for implementation. In the meantime, PPQ SITC is working, as stated in the response to Recommendation 12, on a new SOP on data integrity and quality control for the SNICAS database that will be issued for all SNICAS users, with additional details on supervisors' responsibilities, effective October 31, 2012. All supervisors will review reports and identify any anomalies that would indicate inconsistencies in the data and resolve them.

The Technical Working Group described in several of the responses above that is tasked with establishing operational priorities for SITC that will eventually work in a collaborative manner with any analysts designated to support SITC. For now, that consists of the approximately eight SITC analyst positions in the field and at HQ. This Technical Working Group, in some form to be determined by October 1, 2012, will continue to work after its initial priorities and guidance are developed to request standard queries of data systems and analyses reports that will be used to continuously refine SITC's focus.

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