



Department of Homeland Security Office of Inspector General

CBP's Construction of Border Patrol Facilities and Acquisition of Vehicles





**Homeland
Security**

July 14, 2009

Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audit, inspection, and special reports prepared as part of our oversight responsibilities to promote economy, efficiency, and effectiveness within the department.

This report covers the strengths and weaknesses of Customs and Border Protection's program to construct Border Patrol facilities and acquire vehicles. It is based on interviews with employees and officials of Customs and Border Protection, direct observations, and a review of applicable documents.

The recommendations herein have been developed to the best knowledge available to our office, and have been discussed in draft with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in cursive script that reads "Richard L. Skinner".

Richard L. Skinner
Inspector General

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Abbreviations

CBP	Customs and Border Protection
DHS	Department of Homeland Security
ECSO	Engineering and Construction Support Office
GSA	General Services Administration
OBP	Office of Border Patrol
OIG	Office of Inspector General
SAP	Systems, Applications, and Products
SBI <i>net</i>	Secure Border Initiative net
USACE	United States Army Corps of Engineers

Executive Summary

The objectives of our review were to determine whether Customs and Border Protection (1) planned for and provided effective oversight of Border Patrol facilities construction on the southwest border and (2) procured a sufficient number of vehicles to accommodate the increase in Border Patrol agents. Since July 2006, Border Patrol has added 6,000 agents and plans to add 2,000 agents during 2009, bringing the total to 20,000 agents.

Customs and Border Protection's planning and oversight of design and construction of its Border Patrol facilities needs improvement. Current planning is based on an out-of-date facilities design guide that does not include all current requirements or provide accurate construction cost estimates. Customs and Border Protection also needs uniform policies and procedures and a comprehensive information system to oversee construction projects.

Customs and Border Protection did not complete 56 (77%) of the 73 rapid response facilities projects it planned to complete in 2008. These projects include new facilities, modifications to existing facilities, and temporary solutions to accommodate new agents and shifting agent deployments. Customs and Border Protection has initiated several actions to improve its facilities construction planning and oversight, including updating its design guide, developing a new project management tracking system, and improving and updating the space planning and cost estimation tool.

Customs and Border Protection has not replaced Border Patrol vehicles at the required 20% annual rate and does not have a centralized information system to monitor vehicle availability.

This report originally contained seven recommendations to Customs and Border Protection to enhance the planning and control of facilities projects and improve overall management over vehicles. We have since deleted recommendation 5 given its inconsistency with the department's emerging plans to develop and implement an enterprise-wide project tracking system. Customs and Border Protection concurred with five recommendations and partially concurred with one recommendation, number 6, which remains unresolved. We have incorporated Customs and Border Protection's response to our recommendations in Appendix B.

Background

The United States Border Patrol's priority mission is to detect and interdict terrorists and weapons of terror while accomplishing traditional missions such as detecting, apprehending, and deterring smugglers of humans, drugs, and contraband. In May 2006, the President called for comprehensive immigration reform that included strengthening control of the country's borders by adding 6,000 new agents to the Border Patrol by the end of December 2008, resulting in 18,000 agents on board. The President's FY 2009 budget requested funding for approximately 20,000 Border Patrol agents.

Facilities supporting Border Patrol agents in the field include buildings and other structures at Border Patrol sector headquarters, stations, checkpoints, and remote forward operating bases. In 2008, the Border Patrol's permanent facilities included 143 stations and 20 sector headquarters buildings. By 2015, Customs and Border Protection (CBP) plans to complete 29 new Border Patrol stations, 1 new sector headquarters building, 5 vehicle maintenance buildings, and 7 checkpoint projects for a total estimated cost of \$1.1 billion.

In FY 2007, CBP began constructing 73 Rapid Response Projects to build facilities to support the increase in Border Patrol agents. These projects include new facilities, modifications to existing facilities and temporary solutions to provide additional space until more permanent facilities are constructed. Border Patrol's facilities construction budget for FY 2008 totaled \$170,026,000, including \$69,400,000 for Rapid Response Projects.

The CBP Office of Finance administers the Border Patrol facilities construction program, overseeing strategic planning, programming, budgeting, and construction execution. Within the Finance Office, three Facility Centers located in Dallas, Texas; Indianapolis, Indiana; and Laguna Niguel, California; execute the construction projects. Facility Center project managers oversee facilities design and contract preparation. The CBP project managers carry out their oversight responsibilities through site visits, project delivery team meetings, review of progress and financial reports, and review and approval of potential contract modifications. (Appendix C provides additional details on Facility Center responsibilities.)

CBP's *U.S. Border Patrol Facilities Design Guide (Design Guide)* provides criteria and concepts for planning and designing Border Patrol facilities. The guide covers general architectural designs, defines needed structures and systems, and provides specific technical criteria on building materials and systems. All entities involved in planning and designing

Border Patrol facilities, including architects, engineers, the United States Army Corps of Engineers (USACE), and the General Services Administration (GSA), are to use the guide.

In planning and designing construction projects, the Facility Centers receive input from Border Patrol sector field offices on operational needs for their facilities. In addition, the Office of Border Patrol (OBP) at CBP headquarters provides operational requirements and determines mission needs. OBP personnel participate in design reviews and develop spending plans based on operational priorities, the conditions of existing facilities, and the schedule for deploying agents to facilities.

USACE and GSA provide services to CBP in constructing Border Patrol facilities, including Rapid Response Projects. USACE provides engineering, design, design review, project management, construction management, procurement, real estate acquisition, environmental protection, and other related services. USACE contracts with firms to perform these services and oversees their work. While USACE facilitates the construction of facilities projects that CBP will own, GSA facilitates many of CBP's leasing projects. USACE and GSA are required to submit monthly status reports to CBP on each project, including updates on project status, milestones accomplished, and costs from initiation through completion.

Results of Audit

CBP has not adequately planned or provided sufficient oversight of the design and construction of its Border Patrol facilities because of the absence of (1) a current *Design Guide*, (2) an effective tool for estimating project costs, (3) uniform policies and procedures for CBP project managers' oversight of USACE in constructing facilities, and (4) a comprehensive information system¹ for efficient project management at its Facility Centers. These weaknesses increase the risks of project cost overruns, construction delays, and quality issues. Timely resolution of these issues is important, since CBP plans to complete 29 new Border Patrol stations, 1 new sector headquarters building, 5 sector vehicle maintenance buildings, and 7 checkpoint projects by 2015.

In addition, CBP did not complete 56 (77%) of the 73 Rapid Response Projects originally planned for completion by December 31, 2008. CBP has since completed seven projects and operationally resolved another four. Thus, 45 projects remain to be completed with eight of these projects scheduled for completion after 2009.

¹ Customs and Border Protection refers to an automated information system as a "tool" when it is not part of its enterprise architecture system. We use the generic term "system" rather than "tool" in this report.

CBP has not replaced Border Patrol vehicles at the recommended annual rate and lacks an adequate centralized vehicle management information system to ensure that sufficient vehicles are available for Border Patrol agents.

During our review, CBP initiated steps for facilities planning and oversight to update its *Design Guide*, add a tool to improve cost estimates, and develop a new project management system. CBP also plans to deploy a new vehicle management information system for Border Patrol by the end of FY 2009.

Planning Process Not Adequate for Facilities

Design Guide Is Outdated

CBP's *Design Guide* provides direction during the planning and design phases of a project and is intended to reduce the amount of effort and time required to develop facilities projects. The *Design Guide* for developing facilities was last updated in 2003 and does not reflect recent technology and other new requirements such as the *SBI*net technology. For example, a nearly completed design for construction of the Lordsburg, New Mexico station was retracted and revised to add 3,000 square feet to address *SBI*net requirements. Another example was the need to add a new radio tower to the design of the new Fort Hancock, Texas facility.² This entailed drafting a new scope of work and additional funding to complete the added scope. Introducing changes after the designs are "complete" or once the project is in construction can increase the time and cost to complete the project.

During our review, CBP's Office of Finance – Facilities Management and Engineering began taking steps to update the guide to support faster development of new facilities, more functional designs, and more accurate reflection of the Border Patrol's needs.

Cost Estimates Are Not Reliable

CBP's project cost estimates are understated. CBP derives its estimates from entering data such as the number of agents, type of facility, and functions performed at the facility into an estimating program. The program then computes the total square footage needed for the facility and estimates the project cost per square foot. According to CBP officials, this tool results in an unrealistically low estimate because new requirements, including *SBI* and environmental requirements, have not been added to the tool. The per-square foot cost data is also out-of-date and the tool does

² The Lordsburg, New Mexico and Fort Hancock facilities were not part of the rapid response program.

not provide accurate inflationary adjustments for future costs. Recently, national construction costs had increased by 11% due to rising fuel and materials costs in the year from the initial cost estimate to contract award.

Understated cost estimates may also reduce any allowance for changes as projects progress and may adversely impact timeliness as well as the number of planned projects that can be completed. According to CBP officials, they have initiated an update to enhance the cost estimation tool that includes new requirements, regional costing, and improved inflationary adjustments. CBP also initiated additional training for the staff to provide better construction cost estimates and initiated an Earned Value Management System to better control and estimate project costs, schedule, and performance.

Recommendations

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

Recommendation #1: Update the *Design Guide* to include any new requirements and establish a requirement to regularly update the guide.

Recommendation #2: Complete development of a more reliable cost-estimating tool for facilities construction projects.

Management Comments and OIG Analysis

CBP provided written comments on our draft report. Below is a summary of CBP's written response to the report's first two recommendations and our analysis. A copy of CBP's response and a summary of its plans and progress for addressing the recommendations are included in Appendix B.

CBP's Comments to Recommendation # 1:

CBP concurred with the recommendation to update and establish a requirement to regularly update the *Design Guide* (currently referred to as the Facilities Design Standard). CBP started updating the Facilities Design Standard prior to the release of our draft report. The new Facilities Design Standard is in the final stages of review and CBP expects to release it by July 31, 2009.

OIG Analysis: We consider CBP's comments responsive to the recommendation, which is resolved and open pending full implementation of an updated Facilities Design Standard and establishment of a

requirement to regularly update it. CBP's response did not address how often the Facility Design Standard would be updated.

CBP's Comments to Recommendation #2:

CBP concurred with the recommendation to complete development of a more reliable cost-estimating tool for facilities construction projects as part of the Facilities Design Standard. CBP was working on an improved cost-estimating tool prior to the issuance of our draft report. CBP is currently testing and performing training on this tool and expects to release it by July 31, 2009.

OIG Analysis: We consider CBP's comments responsive to the recommendation, which is resolved and open pending full implementation of a new cost-estimating tool that provides reliable construction cost estimates for facilities.

Oversight of Facilities Projects

More Effective Project Oversight Needed

CBP's standard operating procedures for facility construction oversight do not specify the frequency and scope of review and inspection for CBP project manager visits to construction sites to ensure USACE and GSA properly perform construction and project management. According to CBP officials, their project managers should provide routine oversight through monthly site visits; however, these visits are not always performed which increases the risk of construction problems.

For example, as shown in Figure 1, construction beams or windows were not properly placed on the outside structure of one building, resulting in beams running through the window opening.

Figure 1. Example of an Improperly Placed Construction Beam



In another instance, as documented in the two photos below, carport roofs were built too low for Border Patrol vehicles to fit under them.

Figure 2. Examples of Carport Roofs Built Too Low for Border Patrol Vehicles





Air-cooling units installed in two other buildings located in the desert shut off during periods when outside temperatures rose above 110°F, and had to be reset continually. At other buildings, evaporative cooling units caused excessive humidity that resulted in mold and rusting of equipment and tools in these buildings.

Project managers at the Laguna Niguel and Dallas Facilities Centers provide different amounts and types of oversight. Project managers at Laguna Niguel may conduct on-site construction visits once a month or every other month. Project managers at the Dallas Facilities Center visit construction sites at least once a month. Lack of consistent monthly site visits by the Laguna Niguel project managers appears to be a contributing factor to deficiencies in construction quality identified by the Border Patrol.

Rapid Response Projects Not Completed as Scheduled

Border Patrol agents are deployed based on operational needs, which can change as the amount, type, and location of activity on the border changes. CBP responds to shifting agent deployments with Rapid Response Projects to expedite the availability of facilities for Border Patrol.

CBP scheduled 73 Rapid Response Projects for completion by the end of 2008 to accommodate the 6,000 new agents and to address existing facility gaps for currently deployed agents. To meet the challenge of these projects, CBP established an Integrated Projects Team to monitor the

scheduling and execution of the Rapid Response Projects. Due to project delays, CBP completed only nine projects in 2008 and adjusted the completion schedule for 56 projects beyond December 2008. CBP also canceled or resolved the operational need for eight other projects. Table 1 shows the status and schedule of the 73 Rapid Response Projects as of December 2008.

Table 1. Status of Rapid Response Projects as of December 2008			
Number of Rapid Response Projects	Projects canceled or operationally resolved	Projects completed by 12/31/08	Projects scheduled for completion beyond 12/31/08
73	8	9	56

CBP informed us that as of March 2009, it had completed an additional seven projects and would use alternate solutions, such as leasing, for another four. Thus, 45 projects remain to be completed with eight of these projects scheduled for completion after 2009.

When Rapid Response Projects are not completed on time, the Border Patrol lacks space needed to accommodate its agents. Construction delays could also result in increased costs for labor and materials

In general, environmental impact, scope changes, site identification, and cost issues were responsible for the project delays. For example, two of the southwest border projects were delayed for environmental reasons. In one case, a World War II munitions bunker and underground piping, was discovered during the environmental review, which delayed site acquisition and resulted in CBP selecting another site for the project. In the other, an environmentally protected plant was found on the site. Both delays might have been avoided if an environmental expert had been on the site identification team and had visited the sites. A CBP official told us that CPB is starting to do this.

Two other projects were delayed due to scope change. In one case, the Border Patrol requires an additional 22,000 square feet of space to meet its operational needs; however, it had originally requested only 6,000 square feet. In the other case, two modular units were originally planned but the project was changed to one large modular unit.

Two additional projects were delayed for site-specific reasons. In these two cases, the only site CBP located was one where Border Patrol will be co-located with another entity, resulting in delays due to security reviews and approvals.

CBP advised us, they had performed a “lessons learned” workshop on Border Patrol Rapid Response Projects, in January 2009. The workshop participants discussed lessons learned and identified recommendations in the areas of project planning, requirements definition, project management, external provider coordination, change management, and communication and reporting. The workshop resulted in recommendations concerning environmental site assessments, scope changes, site identification, and cost estimation.

Inefficient Information Monitoring Database

Currently, CBP facility project managers must enter data for their construction projects into two separate information systems: a USACE system, Engineering and Construction Support Office (ECSO), and CBP’s Systems, Applications, and Products (SAP). ECSO is used to track project progress and SAP is used for project generation, funding assignment and obligation, and reporting. Neither system provides all the information CBP needs to efficiently monitor USACE’s management of the projects.

In addition, some data are entered in both systems. For example, project managers enter data on the obligation of project funds into both ECSO and SAP. Further, project managers stated that SAP is not user-friendly, mostly because various cost modules are not linked and it is time-consuming to update information.

CBP project managers stated that it would be more efficient if they could enter all project-related information into a single system. During our review, CBP officials told us that they had contracted with a firm to develop a comprehensive project management system. However, the department plans to develop and implement a single, enterprise-wide project tracking system for use by all components. CBP would benefit from providing input to, and planning to use the projected DHS-wide system to meet its project tracking needs.

Recommendations

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

Recommendation #3: Establish specific policies and procedures on the required frequency and scope of review and inspection work to be conducted by CBP project managers during construction site visits.

Recommendation #4: Implement the recommendations from the “lessons learned” workshop to improve the planning and execution of Border Patrol Rapid Response Projects.

Recommendation #5: Deleted. (See last paragraph of this page)

Management Comments and OIG Analysis

CBP’s Comments to Recommendation #3

CBP concurred with the recommendation to establish specific policies and procedures regarding the required frequency and scope of review and inspection work that CBP project managers should perform during construction site visits. CBP initiated action to develop these policies and procedures prior to the issuance of our draft report. CBP is restructuring its Facilities Management and Engineering office to provide improved project oversight. The Border Patrol facilities program office is establishing review criteria for each project to ensure sufficient project site visits are conducted. CBP expects to implement the new policy and procedures by October 31, 2009.

OIG Analysis: We consider CBP’s comments responsive to the recommendation, which is resolved and open pending full implementation of specific policies and procedures regarding the required frequency and scope of review and inspection work that CBP project managers should perform during construction site visits.

CBP’s Comments to Recommendation #4

CBP concurred with the recommendation to implement the recommendations from the “lessons learned” workshop to improve the planning and execution of Border Patrol Rapid Response Projects. CBP expects full implementation by October 31, 2010.

OIG Analysis: We consider CBP’s comments responsive to the recommendation, which is resolved and open pending full implementation of the “lessons learned” workshop.

A draft version of this report included a fifth recommendation that CBP institute a comprehensive project tracking system for managing its facilities projects. We deleted this recommendation given the department’s plans to develop and implement a single, DHS-wide project tracking system for use by all components.

Acquiring Sufficient Vehicles

CBP has not replaced Border Patrol vehicles at the required 20% annual rate, and CBP does not have up-to-date and accurate information to determine the condition and availability of the approximately 12,000 vehicles in its fleet.

Border Patrol uses a ratio of two vehicles for every three agents. Border Patrol officials reported that during FY 2008, they purchased 4,245 vehicles and used approximately 1,400 of these vehicles to replace 14% of the existing fleet. However, the 14% vehicle replacement rate is significantly below the rate in CBP's Fleet Management Plan. This plan requires replacing vehicles on a 5-year (20% per year) cycle. Border Patrol records show that in October 2007, 33% of the fleet (3,280 vehicles) was more than 5 years old. According to Border Patrol officials, the retention of an aging fleet results in more frequent, extensive, and costly repairs. It also results in more out-of-service vehicles and reduced vehicle availability, which may hinder Border Patrol mission performance.

The Border Patrol does not have a program-wide vehicle management information system, which makes it difficult to determine the number of vehicles available and in service, needing or undergoing maintenance, or out of service. The existing fleet inventory tracking system has limited capability. For example, the system is unable to track maintenance schedules or parts inventories. The Border Patrol is deploying a new vehicle management information system in several sectors, which may resolve these issues and improve the tracking of the fleet inventory and maintenance. Border Patrol plans to complete program-wide deployment of this system by the end of FY 2009.

Recommendations

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

Recommendation #6: Adhere to the requirement in its fleet management plan to replace 20% of Border Patrol vehicles yearly.

Recommendation #7: Ensure that a Border Patrol vehicle management information system is implemented for all sectors by the close of FY 2009.

Management Comments and OIG Analysis

CBP's Comments to Recommendation #6

CBP partially concurred with our recommendation to adhere to its 20% replacement rate for CBP vehicles. CBP proposes that using an analysis of fleet data to forecast the replacement rate within the constraints of funding and vehicle purchase limits would be more advantageous for Border Patrol and other vehicle programs in CBP. CBP reported it has been aggressively replacing Border Patrol vehicles, resulting in a reduced percentage of vehicles exceeding the General Services Administration minimum age from 36% in 2006, to 33% in 2009. Further, CBP reported it substantially reduced the number of inoperable vehicles to 126 in 2009, and that it plans to replace all vehicles identified as inoperable at the end of FY 2008 with current funding.

OIG analysis: We consider this recommendation to be open and unresolved. Although CBP has reported progress in reducing the number of inoperable vehicles and aggressively replacing vehicles, 33% of its fleet still exceeds General Services Administration's minimum age criteria. As a result, we suggest that CBP follow its own Fleet Management Plan, which requires replacing vehicles on a 5-year (20% per year) cycle. If this schedule is no longer optimal, CBP should revise its Fleet Management Plan to include an updated vehicle replacement schedule and the reasons why such a revision is necessary.

CBP's Comments to Recommendation #7

CBP concurred with our recommendation to implement a vehicle management information system for all sectors and provided a due date of December 31, 2009 for full implementation. Currently, CBP has successfully deployed this vehicle management information system in the San Diego and Tucson Sectors. CBP is deploying this system in controlled stages to allow for improvements and modifications.

OIG analysis: We consider CBP's comments responsive to this recommendation, which is resolved and open pending full implementation of a vehicle management information system for all sectors. Although we originally recommended that a system be in place by the end of FY 2009, CBP's basis for implementing this system by December 31, 2009, appears reasonable.

Appendix A

Purpose, Scope, and Methodology

The objectives of our review were to determine whether CBP (1) planned for and provided effective oversight of Border Patrol facilities construction on the southwest border (2) procured a sufficient number of vehicles to accommodate the increases in the number of Border Patrol agents.

We conducted our audit in phases, resulting in three periods of review. The Border Patrol permanent facilities review covered October 2006 through June 2008, and the Rapid Response Projects for facilities review covered October 2005 through March 2009. The Border Patrol vehicles review covered FY 2004 through March 2006, and was updated through September 2008.

We toured and physically observed Border Patrol facilities either in place or under construction at five Border Patrol sectors along the southwest border. The sectors visited were El Centro, California; Yuma and Tucson, Arizona; and El Paso and Laredo, Texas. We also conducted audit fieldwork at CBP headquarters in Washington, DC; Facility Centers in Laguna Niguel, California, and Dallas, Texas; and selected field sites at CBP Border Patrol sector headquarters and station offices. We included sectors and field office sites that had facilities recently constructed or under construction.

We reviewed a sample of facilities under construction within each of the sectors we visited. We reviewed planning documents and learned about construction progress and activities. We interviewed Border Patrol agents and staff about their views and concerns regarding facilities construction to determine whether their operational needs were being satisfied.

At the Facility Centers in Laguna Niguel and Dallas, we reviewed facilities plans and schedules and interviewed center directors and project managers. We discussed construction quality, omissions, and change orders. We also discussed whether construction projects are on schedule and within budget, and whether the completed projects will provide sufficient space for the increased number of agents expected by the end of December 2008. Through interviews and a review of project managers' monitoring reports, we evaluated the adequacy of CBP's system for monitoring facilities design and construction activities being conducted under contracts with USACE and GSA.

We interviewed officials at CBP headquarters to discuss issues arising from our fieldwork at the sectors and facility centers. We also reviewed pertinent records and documents to compare the status of the facilities construction with estimated completion dates.

During our review of CBP's Rapid Response Projects, we visited CBP headquarters in Washington, DC, and interviewed officials from the Border Patrol's Office of Finance Asset Management. We analyzed the Integrated Project Team's Solutions Tracker spreadsheet, as well as updates through July 2008. We also reviewed internal and external Integrated Project Team meeting minutes through July 2008.

During our review of Border Patrol vehicles, we visited CBP headquarters in Washington, DC; four Border Patrol sectors in Tucson, Arizona; McAllen, Texas; Blaine, Washington; and Tonawanda, New York; and 15 stations within the sectors reviewed. We also reviewed the 2008 Report to Congress and CBP Fleet Management Plan, as well as several vehicle maintenance documents. We also interviewed additional CBP officials and analyzed the FY 2007 vehicle inventory.

We performed the audit according to generally accepted government auditing standards. Those standards require that we plan, evaluate internal controls and assess risk, 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.

Appendix B Management Comments to the Draft Report

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



U.S. Customs and
Border Protection

June 8, 2009

MEMORANDUM FOR RICHARD L. SKINNER
INSPECTOR GENERAL
DEPARTMENT OF HOMELAND SECURITY

FROM: Acting Director, Office of Policy and Planning
U.S. Customs and Border Protection

A handwritten signature in black ink, appearing to be "D. P.", written over the printed name of the Acting Director.

SUBJECT: Response to the Office of Inspector General's Draft Report Entitled,
"CBP's Construction of Border Patrol Facilities and Acquisition of
Vehicles"

Thank you for providing us with a copy of your draft report entitled "CBP's Construction of Border Patrol Facilities and Acquisition of Vehicles" and the opportunity to discuss the issues in the report. The report identified measures that U.S. Customs and Border Protection (CBP) can take to enhance the overall effectiveness of its program to construct Border Patrol facilities and to ensure that vehicles are available to support Border Patrol agents.

The Office of Inspector General (OIG) concluded that CBP's planning and oversight of the design and construction of its Border Patrol facilities needs improvement. The report states that current planning is based on an out-of-date facilities design guide which does not include all current facility requirements or provide accurate construction cost estimates. The report also states that CBP needs uniform policies and procedures and a comprehensive management information system to oversee construction projects.

In 2007, CBP convened an Integrated Project Team (IPT), with representatives from various CBP Offices, the U.S. Army Corps of Engineers, and the U.S. General Services Administration to plan and execute facility solutions in support of the large and rapid influx of new Border Patrol Agents. The IPT assessed and prioritized the sites most impacted by the agent increase, utilizing operational need, current station conditions, lead-time requirements, cost effectiveness, and strategic impact to formulate the resulting facility solutions. The IPT continues to monitor the execution of these projects through bi-weekly meetings and regular screening of risks.

The OIG made seven recommendations in its report. CBP concurs with six and partially concurs with one of the recommendations. Attached is a summary of CBP's proposed correction actions to implement the recommendations.

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

Appendix B
Management Comments to the Draft Report

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If you have any questions regarding this response, please contact me or have a member of your staff contact Ms. Lynn Richardson, Audit Liaison, Office of Policy and Planning, at (202) 344-2953.

Attachment

Appendix B

Management Comments to the Draft Report

3

CBP's Corrective Action Plans for Recommendations in the Office of Inspector General's Draft Report Entitled, "CBP's Construction of Border Patrol Facilities and Acquisition of Vehicles"

Recommendation 1: Update the *Design Guide* to include any new requirements and establish a requirement to regularly update the guide.

CBP Response – Concur. Prior to the issuance of this draft report, this recommendation was already being implemented independently by CBP. CBP is in the final review stages for the new Border Patrol Facilities Design Standard and expects the release to occur in July 2009.

Due Date: July 31, 2009

Recommendation 2: Complete development of a more reliable cost-estimating tool for facilities construction projects.

CBP Response – Concur. Prior to the issuance of this draft report, this recommendation was already being implemented independently by CBP. The updated Border Patrol Facilities Design Standard contains a new cost estimation tool. Testing and training in the use of the tool is currently underway. CBP expects release to occur in July 2009.

Due Date: July 31, 2009

Recommendation 3: Establish specific policies and procedures on the required frequency and scope of review and inspection work to be conducted by CBP project managers during construction site visits.

CBP Response – Concur. Prior to the issuance of this draft report, this recommendation was already being implemented independently by CBP. CBP's Facilities Management and Engineering (FM&E) office is restructuring to provide improved end-to-end project oversight. The Border Patrol facilities program office is establishing review criteria for each project and will ensure that site visits are scheduled and conducted to sufficiently monitor the progress of these projects. CBP expects the policy and procedures to be in place and implemented by October 2009.

Due Date: October 31, 2009

Recommendation 4: Implement the recommendations from the "lessons learned" workshop to improve the planning and execution of Border Patrol Rapid Response Projects.

CBP Response – Concur. Prior to the issuance of this draft report, this recommendation was already being implemented independently by CBP. In January 2009, CBP conducted "lessons learned" sessions, which included all Integrated Project Team (IPT) representatives. The output of this event has been provided to all members and implementation is underway. For example, environmental review teams have been established to participate in initial site visits, as recommended in the lessons learned report.

Due Date: October 31, 2010

Appendix B Management Comments to the Draft Report

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Recommendation 5: Institute a comprehensive project management tracking system that encompasses construction and financial information to support efficient monitoring of facilities project progress.

CBP Response – Concur. Prior to the issuance of this draft report, this recommendation was already being implemented independently by CBP. CBP has initiated an effort to acquire and configure a commercial off the shelf (COTS) integrated facilities lifecycle management system, including project management, for use within FM&E. CBP is developing requirements, evaluating potential COTS products to meet those requirements, and coordinating with CBP's Office of Information Technology (OIT) to ensure compatibility and integration with CBP's enterprise financial system, SAP. Significant effort is being exerted to ensure that this tool meets the full needs of the CBP facilities program. As with any IT solution, it will require certification and accreditation before being placed into service on CBP's IT network.

Due Date: October 31, 2010

Recommendation 6: Adhere to the requirement in its fleet management plan to replace 20% of Border Patrol vehicles yearly.

CBP Response – Partially concur. CBP notes that given the progress made in the past three years, relying solely on a single fixed placement rate may inhibit programs from meeting mission requirements. CBP proposes that using the analysis of fleet data to forecast the replacement rate within the constraints of funding and vehicle purchase limits (vehicle caps in the Appropriations Bill) would be more advantageous for Border Patrol and the other vehicle programs in CBP. At publication, the 20% replacement rate was found to be necessary based on several criteria, which focused on the average age of the fleet and the number of deadlined¹ vehicles in the fleet.

From the work done with the CBP Fleet IPT, the data from the system of record (SAP), and the analysis of vehicle buys, CBP has reduced the average age of the fleet to a manageable level. The average age of the fleet was one of the elements used to support a 20% replacement rate. CBP has been aggressively replacing Border Patrol vehicles. In 2006, 36% of the vehicles exceeded the General Services Administration minimum age criteria based on the vehicle model year (age). As of February 2009, that number had been reduced to just 33%.

Another concern that supported the call for a 20% replacement rate was the number of deadlined vehicles in the Border Patrol fleet, as of 2006. Since that time, CBP has made substantial progress eliminating deadlined vehicles from the fleet. As of March 2009, CBP as a whole had only 126 vehicles classified as deadlined, according to the system of record. To date, all of the vehicles identified as deadlined at the end of FY 2008 are scheduled to be replaced with current funding.

Due Date: Ongoing

¹ Deadline vehicles are inoperable vehicles. Vehicles become inoperable because of accidents or through accumulated wear and tear during regular usage in rough terrain and extreme climates.

Appendix B Management Comments to the Draft Report

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Recommendation 7: Ensure that a Border Patrol vehicle management information system is implemented for all sectors by the close of FY 2009.

CBP Response – Concur. We are fully aware of the need to implement a consolidated vehicle management system to improve accountability. In FY 2009, the Office of Border Patrol (OBP) requested \$356,000 for the Vehicle Management Information System (VMIS). As part of our initial effort, we deployed the VMIS in controlled stages to allow us the opportunity to make improvements and modifications prior to full scale deployment. Our initial deployment to the San Diego and Tucson Sectors, the two largest sectors, was very successful. We will continue to deploy to the remaining

seven Southwest Border sectors during the course of the year. Full deployment and implementation will be completed by the end of calendar year 2009. OBP will collaborate with Federal Prison Industries (UNICOR), the application service provider, and AssetWorks, the system/application designer and software company, to ensure the success of the project.

By taking a careful and methodical approach to the implementation of the VMIS, OBP believes that we will have a system that is not only responsive to the needs of our field personnel, but is also an improvement of our overall accountability.

Due Date: December 31, 2009

Appendix C
CBP Facility Centers

CBP has facility centers in Laguna Niguel, California; Dallas, Texas; and Indianapolis, Indiana, to service both the northern and southern border areas. Each facility center executes leasing, construction, and repair and alteration projects in its area of responsibility.

Each facility center has a Construction Branch, responsible for acquisition of CBP-owned facilities, including land acquisition, execution of environmental requirements, design, construction, furniture procurement, and moving coordination. The Construction Branch serves as Contracting Officer’s Technical Representative and coordinates with service providers, including USACE and GSA.

Each facility center also has a Leasing Branch, responsible for lease acquisitions, repairs, and alterations. The Leasing Branch conducts market surveys, facilities design, construction, furniture procurement, and move coordination. The Leasing Branch also serves as Contracting Officer’s Technical Representative and coordinates with service providers, including GSA and USACE.

The following are areas of responsibility for the southern Border Patrol sectors:

<i>Laguna Niguel Facilities Center</i>	<i>Dallas Facilities Center</i>
San Diego Sector	El Paso Sector
El Centro Sector	Marfa Sector
Yuma Sector	Del Rio Sector
Tucson Sector	Laredo Sector
	Rio Grande Valley Sector
	New Orleans Sector

Appendix D
Major Contributors to this Report

Phillip Maulden, Division Director
Sam Bellino, Project Leader
Aldon Hedman, Auditor-in-Charge
Jose Benitez-Rexach, Senior Auditor
Kathleen Hyland, Senior Auditor
Maryann Pereira, Senior Auditor
Falon Newman-Duckworth, Program Analyst

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