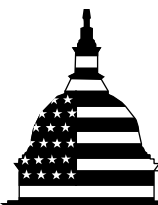


September 2012

HOMELAND SECURITY

Agriculture Inspection Program Has Made Some Improvements, but Management Challenges Persist



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Why GAO Did This Study

According to DHS, invasive species cause an estimated \$136 billion in lost agricultural revenue annually, and since September 11, 2001, concerns have persisted about the vulnerability of agriculture to deliberate introduction of foreign pests and disease. DHS and USDA manage the AQI program, which places agriculture inspectors at U.S. ports of entry to inspect imported agriculture products and intercept foreign pests. GAO reported in 2006 on management challenges in the program and made seven recommendations to improve it. GAO was asked to examine the extent to which (1) DHS and USDA implemented GAO's recommendations; (2) data on arrivals, inspections, and interceptions are used for managing the program; and (3) the views of AQI agriculture specialists on their work environment have changed since 2006. GAO surveyed a representative sample of agriculture specialists and supervisors; reviewed key documents and inspection procedures; visited five selected ports of entry based on size and entry pathways, such as air or sea; interviewed DHS and USDA officials; and reviewed AQI data. The survey instrument and most results can be viewed at [GAO-12-884SP](#).

What GAO Recommends

GAO recommends, among other things, that (1) DHS and USDA develop a joint strategic plan for the AQI program, (2) DHS develop a plan for implementing a staffing model, and (3) DHS and USDA take steps to improve the reliability of certain data. DHS and USDA agreed with the recommendations.

View [GAO-12-885](#). To view the e-supplement online, click on [GAO-12-884SP](#). For more information, contact Lisa Shames at (202) 512-3841 or shamesl@gao.gov.

HOMELAND SECURITY

Agriculture Inspection Program Has Made Some Improvements, but Management Challenges Persist

What GAO Found

The Department of Homeland Security (DHS) and the U.S. Department of Agriculture (USDA) have taken steps to implement all seven of the recommendations GAO made in 2006 to improve the Agriculture Quarantine Inspection (AQI) program, but they face challenges in fully implementing four of them. Specifically, DHS and USDA have implemented GAO's recommendations to improve information sharing, review DHS's financial management system for the AQI program, and remove barriers to timely and accurate transfers of AQI user fees—collected for AQI services provided in connection with the arrival of international air passengers and conveyances at U.S. ports. However, DHS and USDA face challenges in fully implementing GAO's recommendations to adopt meaningful performance measures, establish a national risk-based staffing model, improve the agriculture canine program, and revise user fees to cover program costs. For example, in 2006, GAO recommended that DHS and USDA adopt meaningful performance measures for assessing the AQI program's effectiveness at intercepting foreign pests and disease. DHS and USDA have expanded the use of one type of performance measure but have not developed measures for all aspects of the AQI program that are important for its management. In addition, the AQI program does not have a strategic plan—a leading practice that would provide DHS and USDA with a framework for defining the mission of what the program seeks to accomplish, setting goals to achieve desired results, and identifying performance measures for gauging progress toward those goals. Furthermore, DHS has undertaken efforts to respond to GAO's recommendation to develop a national, risk-based staffing model but does not yet have one, and DHS anticipates that the model will recommend significant staffing increases. DHS officials told GAO they do not have the resources to increase staff, but the agency has not developed a plan that assesses the risk of potential fiscal constraints on its ability to implement the staffing model. Without a plan or strategy to address potential resource constraints on staffing by considering the fiscal resources that may realistically be available, DHS risks increasing the vulnerability of the agriculture sector to foreign pests and disease.

The AQI program uses data on arrivals, inspections, and interceptions at U.S. ports of entry to determine how well agriculture inspections identify prohibited materials and to review ports' performance, but data quality issues may prevent AQI program officials from making full use of the data. For example, the data may not be reliable. DHS and USDA recognize that data quality is an ongoing issue and in 2004 created an interagency group to address this issue. However, from 2010 to 2011, joint DHS-USDA reviews of 22 selected ports found discrepancies in the data at about half of the ports reviewed (10 out of 22). Data reliability has the potential to affect other key efforts that are currently under way, such as the program's staffing model. Without reliable data, AQI program officials do not have assurance that they have the information needed to manage the program.

GAO also presents analysis of survey data from 2006 and 2012 on agriculture specialists' and supervisors' views about their work environment.

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Abbreviations

APHIS	Animal and Plant Health Inspection Service
AQI	Agricultural Quarantine Inspection
CBP	Customs and Border Protection
DHS	Department of Homeland Security
GPRA	Government Performance and Results Act
PPQ	Plant Protection and Quarantine
USDA	U.S. Department of Agriculture
WADS	Work Accomplishment Data System

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United States Government Accountability Office
Washington, DC 20548

September 27, 2012

Congressional Requesters

The United States is one of the world's largest producers, consumers, exporters, and importers of agricultural commodities. However, some of these imported products may contain exotic pests and diseases. According to the Department of Homeland Security (DHS), invasive species cause an estimated \$136 billion in lost agricultural revenue annually. For example, the Asian Longhorned Beetle has destroyed more than 30,000 trees in Illinois, New Jersey, and New York since it was discovered in 1996 in imported cargo, and it remains a significant problem today. Damages for this infestation have been estimated at more than \$269 million, and according to the U.S. Department of Agriculture (USDA), if the infestation were to expand nationwide, it could cause more than \$41 billion in losses. Furthermore, the terrorist attacks of September 11, 2001, heightened concerns about agriculture's vulnerability to terrorism, including the deliberate introduction of livestock, poultry, and crop diseases.¹

Under the Agricultural Quarantine Inspection (AQI) program, international passengers and cargo at U.S. ports of entry are inspected to seize prohibited material and intercept foreign agricultural pests. Historically, USDA was responsible for the AQI program, but the Homeland Security Act of 2002 split responsibility for the AQI program between DHS and USDA's Animal and Plant Health Inspection Service (APHIS). DHS acquired the authority to inspect passenger declarations and cargo manifests; international passengers; baggage; cargo; and conveyances such as ships, aircraft, vehicles, buses, and rail cars; and to seize and quarantine suspect articles. Under this authority, DHS's Customs and Border Protection's (CBP) agriculture specialists perform these duties at ports of entry located at airports, seaports, and land borders throughout the United States. Inspection methods include the examination of baggage by hand, X-ray, and canine inspection, and the examination of documents accompanying incoming cargo to ensure compliance with

¹GAO, *Homeland Security: Actions Needed to Improve Response to Potential Terrorist Attacks and Natural Disasters Affecting Food and Agriculture*, [GAO-11-652](#) (Washington, D.C.: Aug. 19, 2011).

plant and animal health and trade agreements. An agriculture inspection may result in an interception—the identification of items that may be confiscated or transferred to an APHIS facility for subsequent evaluation or treatment, depending on the product or material. APHIS remains responsible for setting inspection policy, overseeing CBP agriculture specialists' training, and managing and collecting AQI user fees—fees collected in connection with the arrival of international air passengers and conveyances at ports in the customs territory of the United States.

For more than a decade, we have reported on challenges related to the AQI program.² In particular, in 2006, we issued two reports on management challenges in the AQI program, including one in May 2006, in which we identified shortcomings in the program's staffing, performance measures, inter-agency coordination, and inspection performance.³ In our May 2006 report, we made seven recommendations to DHS and USDA to improve the AQI program by (1) improving information-sharing, (2) undertaking a full review of DHS's financial management system for the AQI program, (3) removing barriers to timely and accurate AQI user fee transfers from USDA to DHS, (4) adopting meaningful performance measures, (5) establishing a national risk-based staffing model, (6) improving the agriculture canine program, and (7) revising user fees to cover AQI program costs. DHS and USDA generally agreed with these recommendations and in 2007 created a joint task force to, among other things, identify and implement solutions. In November 2006, we issued a report with additional analysis of survey data from our May 2006 report regarding agriculture specialists' views on their work environment.⁴

Concerns persist that the agriculture sector remains vulnerable to the unintentional or deliberate introduction of pests and disease. In this context, you asked us to examine the AQI program. Our objectives for this report were to examine the extent to which (1) USDA and DHS have

²GAO, *Agricultural Inspection: Improvements Needed to Minimize Threat of Foreign Pests and Diseases*, [GAO/RCED-97-102](#) (Washington, D.C.: May 5, 1997).

³GAO, *Homeland Security: Management and Coordination Problems Increase the Vulnerability of U.S. Agriculture to Foreign Pests and Disease*, [GAO-06-644](#) (Washington, D.C.: May 19, 2006).

⁴GAO, *Homeland Security: Agriculture Specialists' Views of Their Work Experiences after Transfer to DHS*, [GAO-07-209R](#) (Washington, D.C.: Nov. 14, 2006).

implemented recommendations we made in 2006 to improve the AQI program; (2) data on arrivals, inspections, and interceptions are used for managing the program; and (3) the views of agriculture specialists at CBP regarding their work environment have changed, if at all, since our 2006 reports.

To address all of these objectives, we selected a nonprobability sample of five CBP ports of entry to visit in order to observe agriculture inspection work activities and discuss challenges related to conducting agriculture inspections and interceptions. These ports of entry included Austin, Texas; Baltimore, Maryland; Dallas, Texas; Miami, Florida; and San Ysidro, California. We selected these ports of entry based on size and entry pathways, such as air, sea, and land. Because we used a nonprobability sample, the information we obtained from these visits cannot be generalized to other CBP ports of entry. The visits instead provided us with more in-depth information on the perspectives of various agriculture specialists in these ports of entry about the management of the AQI program.

To examine the implementation of recommendations from our May 2006 report, we interviewed DHS and USDA officials and reviewed documentation and criteria related to CBP's performance measures, information-sharing between CBP and APHIS, DHS's financial management system, CBP's agriculture staffing model, CBP's agriculture canine program, AQI's user fee transfers, and AQI user fee modifications to cover AQI program costs. To examine the extent to which data on agriculture arrivals, inspections, and interceptions are used to manage the program, we reviewed DHS and USDA inspection and interception data, related summary reports, and policies, and interviewed key program officials at DHS and USDA headquarters, in the field, and at ports of entry. To address our objective on agriculture specialists' views, we developed a questionnaire to survey CBP agriculture specialists, which contained closed-ended and open-ended questions. Specifically, we surveyed a stratified random probability sample of 556 agriculture specialists and supervisors from the universe of 2,311 agriculture specialists, including supervisors and agriculture canine handlers at CBP. To facilitate comparison with the findings from our May 2006 and November 2006 reports, we developed similar questions for this survey. We also used the results of our survey to inform our analysis on the extent to which DHS and USDA have implemented some of the recommendations we made in 2006. We received an unweighted response rate of 74 percent, and the results of our analysis of closed-ended survey questions are generalizable to all agriculture specialists and

supervisors at CBP. More details on our scope and methodology appear in appendix I. To view the full results of our survey, please see an electronic supplement to this report ([GAO-12-884SP](#)).

We conducted this performance audit from August 2011 to September 2012 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.

Background

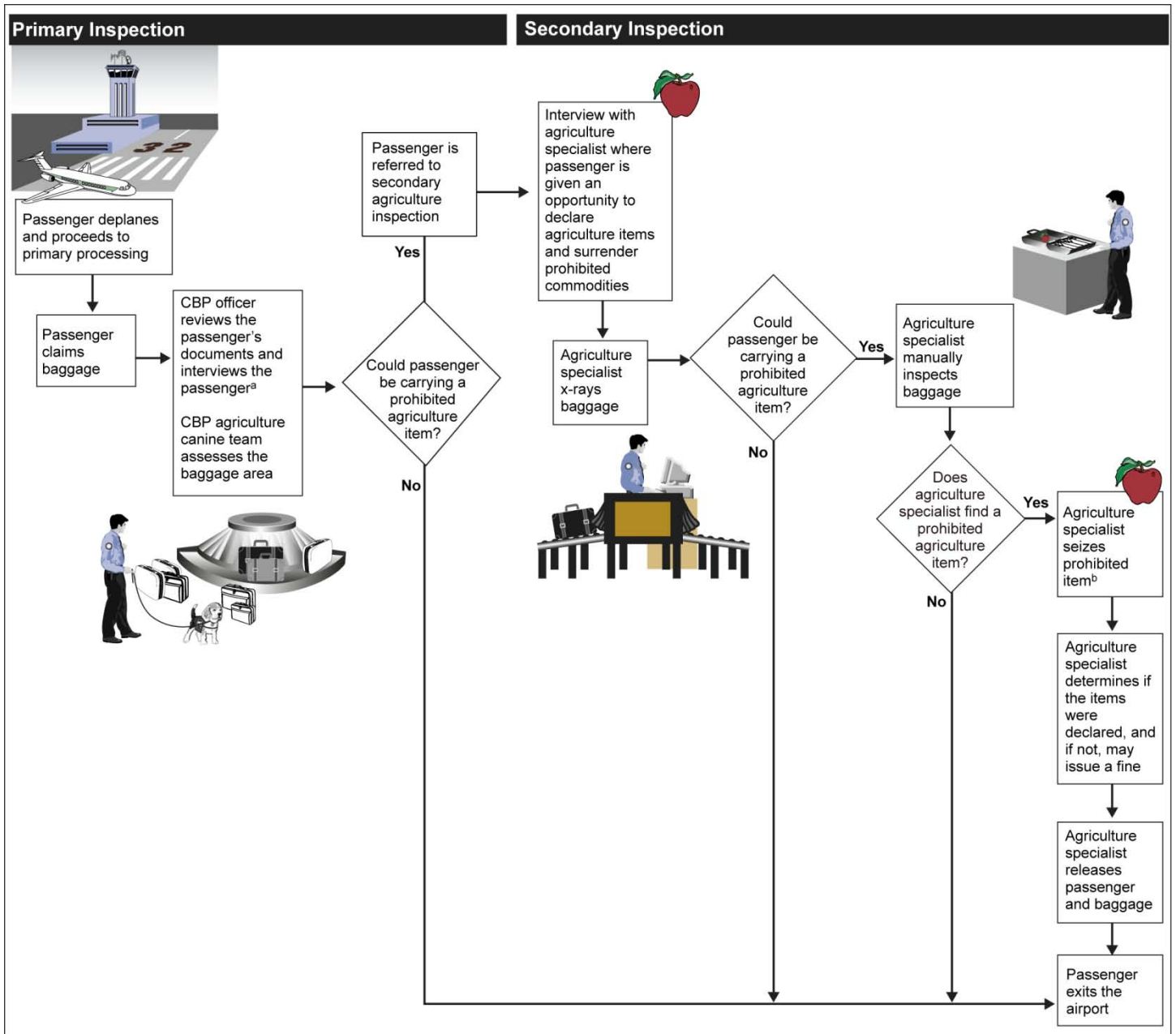
From 1913 until 2002, USDA was responsible for the inspection of plants and animals at U.S. ports of entry. Following the September 11, 2001, terrorist attacks, Congress passed the Homeland Security Act of 2002,⁵ which combined the inspection activities of the Department of the Treasury's Customs Service, the Department of Justice's Immigration and Naturalization Service, and USDA's APHIS into the newly created DHS. The Secretaries of DHS and of USDA signed a memorandum of agreement in February 2003, agreeing to work cooperatively to implement the relevant provisions of the Homeland Security Act of 2002. Under the memorandum of agreement, APHIS's responsibilities include managing user fees, overseeing agriculture specialists' training, and providing pest identification services; and CBP's responsibilities include conducting inspections and related activities. Consistent with the Homeland Security Act of 2002 and the agreement, in 2003 approximately 1,500 agriculture specialists who had formerly worked for APHIS became CBP employees.

In 2003, CBP established an initiative called "One Face at the Border," which unified its three missions—customs, immigration, and agricultural inspection—by cross-training CBP customs and immigration officers and agriculture specialists in all three areas. The inspection procedures vary somewhat by the transportation pathway, such as airports, seaports, or land border crossings, but, generally, CBP officers conduct primary inspections, including interviewing passengers, and may refer passengers to agriculture specialists who conduct more detailed secondary

⁵Pub. L. No. 107-296, 116 Stat. 2135.

inspections, including subsequent interviews of passengers or examination of baggage. Figure 1 shows an example of primary and secondary inspection procedures at an airport.

Figure 1: Example of Primary and Secondary Inspection Procedures at an Airport



Source: GAO analysis of CBP documents and interviews; Art Explosion (clip art).

^aDuring the interview, the CBP officer offers the passenger the opportunity to amend documents and declare items.

^bAfter seizing the material, the agriculture specialist either sends an unknown detected pest to the APHIS pest identifiers or sends the material to the incinerator to be destroyed.

As of April 2012, approximately 2,360 CBP agriculture specialists, including those who formerly worked with APHIS and those hired by CBP, were assigned to about half, or 167 of the 329 U.S. ports of entry. Each U.S. port of entry can include one or more pathway, such as airports, seaports, or land border crossings. For example, the port of Baltimore, Maryland, has an airport and seaport, whereas the port of Dallas, Texas, has just an airport. CBP port directors are responsible for overseeing operations at ports of entry and assigning agriculture specialists to specific port facilities. The ports of entry are organized into 20 district field offices across the United States, and these district offices are headed by CBP field office directors who also serve as liaisons between CBP headquarters and port management. In 2005, APHIS and CBP established a formal assessment process at select ports—known as joint quality assurance reviews—to ensure that ports of entry carry out agricultural inspections in accordance with APHIS’s regulations, policies, and procedures. APHIS and CBP spent about \$33,000 conducting eight such reviews in 2011, and, according to CBP officials, the reviews focus on ports that are considered to be high risk for agriculture.

The Food, Agriculture, Conservation, and Trade Act of 1990, as amended, authorizes the Secretary of Agriculture to set and collect user fees for AQI services provided in connection with the arrival, at a port in the customs territory of the United States, of commercial vessels, commercial trucks, commercial railroad cars, commercial aircraft, and international passengers.⁶ The Secretary subsequently delegated this authority to APHIS. The fees are paid either directly by shipping companies or indirectly by air passengers through fees on tickets. CBP collects user fees for commercial vessels and trucks and deposits the collections into APHIS’s user fees account. APHIS collects all other user fees and periodically transfers a pre-agreed portion of the total collections to CBP to support CBP’s agriculture-related operations. APHIS has revised the AQI user fees several times since the act was passed. For example, through the rulemaking process, APHIS increased the user fees in November 1999 and, in January 2003, extended the adjusted fees indefinitely. In August 2006, APHIS published a final rule affirming a December 2004 interim rule that increased user fees again. We have previously reported on how the fees are set, collected, and distributed,

⁶Pub. L. No. 101-624 § 2509, 104 Stat. 3359 (codified as amended at 21 U.S.C. § 136a). These fees are credited to USDA accounts that incur the costs associated with the AQI services. The fees remain available until expended, without fiscal year limitation.

and the benefits and challenges of this process to agencies and stakeholders, including the implications of consolidating these fees under the authority of DHS.⁷

DHS and USDA Have Taken Steps to Implement GAO's Seven Recommendations, but Have Not Fully Implemented Four of Them

DHS and USDA took steps to implement all seven recommendations we made in our May 2006 report, but they faced challenges fully implementing four of them.

DHS and USDA Have Implemented Three Recommendations to Enhance the Effectiveness of the AQI Program

DHS and USDA have implemented our recommendations to (1) improve information-sharing, (2) undertake a full review of DHS's financial management system for the AQI program, and (3) remove barriers to timely and accurate AQI user fee transfers from USDA to DHS.

Improve information-sharing. In our May 2006 report,⁸ we recommended that DHS and USDA ensure that they more effectively share urgent alerts and other information essential to safeguarding U.S. agriculture and that they transmit such information to agriculture specialists at the ports. At that time, we reported that agriculture specialists were not consistently receiving notifications of changes to inspection procedures or policies and urgent alerts from APHIS—*notices of emerging concerns about foreign pests and diseases*—in a timely manner. In response to our recommendation, in 2007, DHS established the position of Deputy Executive Director for Agriculture Operational Oversight to serve as a

⁷GAO, *Federal User Fees: Substantive Reviews Needed to Align Port-Related Fees with the Programs They Support*, [GAO-08-321](#) (Washington, D.C.: Feb. 22, 2008); and *Federal User Fees: Key Aspects of International Air Passenger Inspection Fees Should Be Addressed Regardless of Whether Fees Are Consolidated*, [GAO-07-1131](#) (Washington, D.C.: Sept. 24, 2007).

⁸[GAO-06-644](#).

primary point of contact for coordination among CBP, APHIS, and AQI stakeholders, such as state departments of agriculture, who would be largely responsible for eradicating foreign pests. In addition, CBP implemented a policy to disseminate urgent agriculture alerts to its field offices within 24 hours of receipt, and the alerts are then disseminated to agriculture specialists at the ports. These alerts, as well as any changes in inspection procedures or policies, are also available on the AQI program's intranet site. Our survey results indicate that an estimated 83 percent of the agriculture specialists and supervisors at CBP found that information regarding agriculture regulatory changes was delivered in a timely manner either always or most of the time.⁹ Our survey results also indicate that an estimated 4 percent of agriculture specialists and supervisors at CBP believe that the timeliness of information provided to agriculture specialists is a very major challenge, while an estimated 57 percent believe it is only a minor challenge or not a challenge.¹⁰

Review DHS's financial management system. In 2006, we recommended that DHS undertake a full review of its financial management systems, policies, and procedures for the AQI program to ensure financial accountability for funds allocated for agricultural quarantine inspections.¹¹ At that time, CBP's financial management system did not separately track time spent on agriculture activities from other types of activities. For example, a CBP officer conducting a primary inspection of an air passenger could ask questions related to immigration, customs, and agriculture activities, but only the time spent asking questions related to agriculture would generate AQI user fees and need to be reported to APHIS. However, CBP's financial system did not track this time separately. As a result, CBP provided APHIS with estimates of the time

⁹The 95 percent confidence interval surrounding the estimate of 83 percent of agriculture specialists and supervisors at CBP believing information regarding agriculture regulatory changes was delivered in a timely manner either always or most of the time ranges from 78.8 to 87.3.

¹⁰The 95 percent confidence interval surrounding the estimate of 4 percent of agriculture specialists and supervisors at CBP believing that the timeliness of information provided to agriculture specialists is a very major challenge ranges from 2.1 percent to 7.3 percent, and the 95 percent confidence interval surrounding the estimate of 57 percent of agriculture specialists and supervisors at CBP believing that it is a minor challenge or not a challenge ranges from 51.5 percent to 62.6 percent.

¹¹[GAO-06-644](#).

spent on agriculture activities and the associated costs. Since we last reported, CBP added agriculture-specific activity codes to its financial management system, which, according to CBP officials, allows CBP to provide APHIS with actual costs related to user fees. In addition, CBP issued guidance to clarify how employees should account for activities that are simultaneously related to immigration, customs, and agriculture activities so that this information could be tracked for the purpose of collecting AQI user fees. According to APHIS and CBP officials, the new activity codes and guidance allow CBP to accurately report its costs by user fee type to APHIS and ensure financial accountability for funds allocated to AQI user fees.

Accurately transfer user fees. In 2006, we recommended that USDA take steps to assess and remove barriers to the timely and accurate transfer of AQI user fees to DHS.¹² At that time, transfers of user fees from USDA's APHIS to DHS's CBP were often delayed and their amounts were sometimes less than CBP expected, which adversely affected agricultural inspection activities. For example, in 2006, we reported that during fiscal years 2004 and 2005, CBP frequently did not receive the transfers at the time specified or for the agreed upon amount, causing some ports to reduce spending for supplies or to delay hiring or purchasing equipment. Since that time, APHIS and CBP have fully implemented a user fee transfer agreement that allows for a bimonthly transfer schedule that better accommodates the inflow of AQI user fee funds. This new user fee agreement also created chief budget liaisons at APHIS and CBP and provides for meetings at least 4 times a fiscal year to discuss AQI funding. Our analysis of transfer records provided by APHIS shows that, from fiscal year 2006 through 2011, 34 of the 36 scheduled user fee transfers were made in accordance with the new, bimonthly transfer schedule. During that time, six scheduled transfers were less than the scheduled amount, and, for each, APHIS made up the difference either by adding an unscheduled transfer or by adding the difference to the next scheduled transfer. APHIS and CBP officials told us that transfers have been more timely and accurate since the changes were implemented.

¹²[GAO-06-644](#).

DHS and USDA Faced Challenges Implementing Four of Seven Recommendations

Adopt Meaningful Performance Measures

DHS and USDA faced challenges in fully implementing our recommendations to (1) adopt meaningful performance measures, (2) establish a national risk-based staffing model, (3) improve the agriculture canine program, and (4) revise user fees to cover AQI program costs.

In 2006, we recommended that DHS and USDA adopt meaningful performance measures for assessing the AQI program's effectiveness at intercepting foreign pests and disease on agricultural materials entering the country by all pathways and posing a risk to U.S. agriculture.¹³ At that time, CBP had not adopted performance measures that took into account the agency's expanded mission or considered all pathways by which prohibited agriculture items or foreign pests may enter the country. In response to our recommendation, in 2007, APHIS and CBP created a joint task force that expanded existing performance measures to more pathways, including passengers' baggage, pedestrians, and vehicles, as well as some cargo pathways. These performance measures provide information about the amount of prohibited agriculture items expected to be found in specific pathways during inspections, which can then be compared with data on the actual amount found. According to APHIS and CBP officials, this comparison can provide some information regarding the effectiveness of agricultural inspection activities as well as the relative risk that prohibited pests pose in a particular pathway. For example, in fiscal year 2011, APHIS estimated that 3.5 percent of international airline passengers were expected to be carrying prohibited agriculture items, and agricultural inspections actually found prohibited items in 3.2 percent of international airline passengers, suggesting that the agricultural inspections may not have found all items for that year.

Even as APHIS and CBP expanded existing performance measures, they did not develop measures for all aspects of the AQI program that are important for its management. Thus, existing performance measures are not sufficient to assess the program's overall effectiveness. For example, APHIS officials told us that the AQI program does not have performance measures for gauging the timeliness of APHIS's pest identification services, which form the basis for deciding how to treat inspected material. According to APHIS officials, they are working independently to develop such measures. In addition, CBP officials told us that there are no performance measures for gauging the extent to which the AQI

¹³[GAO-06-644](#).

program targets inspections to commodities or pathways of higher risk. Furthermore, there are no performance measures for assessing progress related to the AQI program's expanded mission to prevent agroterrorism, such as preventing the intentional introduction of pests harmful to agriculture by coordinating with intelligence entities. According to the Director of CBP's Agriculture/Bio Terror Countermeasures division, there is an ongoing effort to develop a measure of CBP's ability to prevent intentional introductions of harmful pathogens. CBP officials also told us that because the current performance measures are not designed to indicate what type of inspection procedure would most likely identify a prohibited item—for example, whether an item would be more likely to be found using an x-ray or a canine team—they are limited in their usefulness for effectively deploying their inspection resources. According to APHIS and CBP officials, the two agencies have not created additional performance measures for the AQI program because they have largely focused their performance management efforts on expanding their existing performance measures to additional pathways. In addition, they told us that developing additional performance measures has been a challenge because of the diverse missions of the two agencies. Our work on results-oriented organizations states that performance goals and measures that successfully address important and varied aspects of program performance are key elements of results-oriented organizations.¹⁴

The AQI program also does not have a strategic plan that could serve as the framework for defining the mission of what the program seeks to accomplish, setting goals to achieve the desired results, and identifying performance measures for gauging progress towards those goals. The Government Performance and Results Act of 1993, as amended,¹⁵ (GPRA) requires, among other things, that federal agencies develop multi-year strategic plans, and we have previously reported that these requirements can also serve as leading practices for strategic planning at lower levels within federal agencies, such as planning for individual

¹⁴GAO, *Agency Performance Plans: Examples of Practices That Can Improve Usefulness to Decisionmakers*, [GAO/GGD/AIMD-99-69](#) (Washington, D.C.: Feb. 26, 1999).

¹⁵Pub. L., No. 103-62, 107 Stat. 285, *amended by* GPRA Modernization Act of 2010, Pub. L. No. 111-352, 142 Stat. 3866.

divisions, programs, or initiatives.¹⁶ The memorandum of agreement that established APHIS and CBP roles in the AQI program also emphasized the need for coordination between the two agencies. In 2007, a task force comprising of APHIS and CBP employees identified the need to create a joint agency AQI strategic plan, but an official with the task force told us that this effort was not successful because the two agencies took fundamentally different approaches to strategic planning that could not be resolved. Instead, according to APHIS and CBP officials, the two agencies have incorporated elements of AQI activities into each agency's separate strategic planning efforts. For example, the strategic plan for APHIS's Plant Protection and Quarantine program has a program goal of optimizing the effectiveness of pest exclusion and prevention activities. At the same time, CBP's Office of Field Operations has a separate draft strategic plan that contains an objective for protecting against the introduction of plant pests and foreign animal diseases. Each plan has different performance measures. These separate strategic plans do not reflect a coherent joint mission with program goals that can serve as the foundation for developing performance measures for the AQI program as a whole. Without a joint strategic plan defining the mission and goals of the AQI program, APHIS and CBP do not have a unified framework for developing meaningful performance measures.

Establish a National Risk-Based Staffing Model

In 2006, we recommended that DHS and USDA establish a process to identify and assess the major risks posed by foreign pests and disease and develop and implement a national staffing model to ensure that agriculture staffing levels at each port are sufficient to meet those risks.¹⁷ At that time, we found that CBP had not developed or used a risk-based staffing model to ensure that adequate numbers of agriculture specialists were staffed to the areas of greatest vulnerability for introducing pests and disease. In response to our recommendation, CBP has made multiple attempts to build a staffing model since 2006, but agency officials told us the agency has not yet developed a risk-based staffing model that takes into account specialized, port-specific needs. CBP officials said that after several attempts to create their own staffing model, they concluded they did not have the needed expertise or reliable data to do so. CBP officials told us that, in 2009, they hired a contractor for \$300,000 to

¹⁶For example, see GAO, *Environmental Justice: EPA Needs to Take Additional Actions to Help Ensure Effective Implementation*, [GAO-12-77](#) (Washington, D.C.: Oct. 6, 2011).

¹⁷[GAO-06-644](#).

develop a model, and the agency received the model in September 2010. However, CBP determined that the model was inadequate because it did not incorporate specialized staffing needs, such as ports where unique commodities (e.g., cut flowers) are inspected. CBP is in the process of soliciting for a new contract to revise the staffing model to account for these specialized staffing needs, and they estimate that this new contract will cost an additional \$300,000. CBP officials told us their goal is for the revised staffing model to be completed and approved by September 2014, but as of June 2012, officials said that the effort to finalize the contract solicitation is 4 months behind schedule. In addition, CBP officials were unable to provide contracting documents to substantiate their timeline. CBP officials told us they are having difficulty writing the new contract solicitation because DHS's information requirements for contracting documents have changed since they wrote the previous contract, and they were unaware of the new requirements when they submitted their draft documents. In addition, a CBP official involved in the contracting process told us that the AQI program generally does not use contractors; therefore, the program's experience in managing the contracting process is limited.

CBP officials told us they anticipate that the revised staffing model will recommend significant increases in staff at many locations because the staffing model they received in September 2010 recommended a 32-percent increase in the total number of agriculture specialists for the AQI program. CBP officials also told us they currently do not have the resources to increase staff above replacement levels. However, the agency has not developed a plan or strategy that assesses the risk of potential fiscal constraints on their ability to implement the staffing model. Under standards for internal control in the federal government, agencies are to assess the risks they face from external and internal sources and to determine what actions should be taken to mitigate them.¹⁸ Because the AQI program may not have the fiscal resources to add the number of agriculture specialists that the model recommends, CBP faces the risk of being unable to keep up with the demand for agricultural inspections. In 2006, we reported that the changing nature of international travel and agricultural imports creates risks for introducing pests and disease.¹⁹

¹⁸GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: Nov. 1999).

¹⁹[GAO-06-644](#).

Improve the Effectiveness of
the Agriculture Canine Program

These risks include the volume of passengers and cargo, the type of agricultural products, countries of origin, and ports of entry where passengers and cargo arrive in the United States. Without a plan or strategy to optimize the allocation of staff to those ports of highest need that considers the fiscal resources that may realistically be available, CBP risks investing in a staffing model it cannot execute and increasing the vulnerability of the agriculture sector to foreign pests and disease. International trade could also be affected if agriculture specialists are not available to inspect cargo in a timely manner.

In 2006, we recommended that DHS and USDA work together to improve the effectiveness of the agriculture canine program by reviewing policies and procedures regarding training and staffing of agriculture canines and ensure that these policies and procedures are followed in the ports.²⁰ At that time, the agriculture canine program was understaffed and proficiency scores of canine teams had declined. Agriculture canines are a key tool for targeting passengers and cargo for inspection by detecting the scent of specific prohibited agricultural items, such as citrus or beef. CBP officials told us that the use of canines can increase the number of agriculture interceptions. For example, at one port of entry that we visited, after a canine handler was assigned to work a pathway where no canine team had previously worked, interceptions increased by 800 percent. In response to our recommendation, CBP has

- *Increased staffing levels.* According to CBP officials, there are currently 114 active agriculture canine teams compared with the approximately 80 teams that were in place in 2006. We could not determine if the staffing levels were adequate without a final staffing model for the AQI program. According to CBP officials, the staffing model being developed by CBP includes staffing recommendations for agriculture canine teams. However, as discussed above, CBP officials told us that they do not have a plan to implement the staffing model results for deploying canine teams effectively at the ports because of current resource constraints.
- *Increased canine training requirements.* In 2006, we reported that 60 percent of the 43 agriculture canine teams tested failed the 2005 proficiency test—an annual performance evaluation all canine

²⁰[GAO-06-644](#).

enforcement teams must undergo to maintain certification of their detection capability. We recommended that USDA and DHS review canine training policies. In response, in 2007, trainers from USDA's National Detector Dog Training Center—the training center for agriculture canine teams—evaluated the annual agriculture canine certification program at selected ports. As a result of these evaluations, officials from CBP and the training center decided to extend the agriculture canine field training course by 1 week to add, among other things, hands-on training for conducting certifications at the ports. According to the national agriculture canine program manager, all current canine teams have passed the annual proficiency test.

- *Expanded management oversight.* CBP hired a national agriculture canine program manager with canine and agriculture experience to help ensure that staffing and training policies are followed in the ports. This program manager is responsible for canine handler recruitment activities; monitoring the training and staffing status of canine handlers; and coordinating the flow of information among canine handlers, field offices, and training centers. For example, the agriculture canine program manager noted that one of her primary responsibilities is to coordinate with the National Detector Dog Training Center to assist agriculture canine teams with training procedures and policies.

Even with these efforts, the agriculture canine program still faces challenges related to supervisory training and data reliability. First, supervisors may not have canine training or experience. Based on the results of our survey of agriculture specialists, we estimate that 35 percent of agriculture canine specialists at CBP believe that their supervisor did not have adequate agriculture canine expertise to advise them on any work-related concerns in the past year.²¹ Our analysis of findings from the joint CBP-APHIS quality assurance reviews in 2010 and 2011 shows that canine handlers at 4 of the 15 ports with canine handlers that were reviewed reported to a supervisor who had not taken the formal canine supervisory training course. According to USDA's National Detector Dog Manual, the supervisory training class covers topics related

²¹The 95 percent confidence interval surrounding the estimate that 35 percent of agriculture canine specialists at CBP believe that their supervisor did not have adequate agriculture canine expertise to advise them on any work-related concerns in the past year ranges from 26.6 percent to 43.4 percent.

to using canine teams, proficiency training, veterinary requirements, and work expectations. The agriculture canine program manager told us that this formal training class is available, but not mandatory, for canine supervisors. Port directors at individual ports of entry are responsible for determining whether a canine supervisor should take the class and whether the port has the resources to support sending the supervisor to the class. Not having supervisors with experience in agriculture canines can, according to the canine handlers we spoke with at ports of entry, make it difficult for the canine handlers to get support when they encounter difficulty or have questions. Also, in March 2004, we reported that investing in and enhancing the value of employees through training and development is crucial for the federal government to successfully acquire, develop, and retain talent.²²

Second, we found that some data being used to support the agriculture canine program may not be sufficiently reliable for assessment because they are incomplete and inaccurate. In addition, some data being collected may not be meaningful. The agriculture canine program relies on multiple types of data to track the work activities of canine handlers, such as whether the handler is active or on leave and what training activities the team has completed. However, we found the following:

- *Some data are incomplete and inaccurate.* For example, we analyzed data from fiscal years 2010 and 2011 on canine teams' weekly training exercises. The program manager uses this information to ensure that canine teams are meeting their training requirement and maintaining a minimum required proficiency level to conduct agricultural inspections. However, we estimate that the percent of missing values in this data set ranges from 13 percent to 22 percent from January 2010 through July 2011. We could not accurately determine the precise number of missing values because, according to the canine program manager, the field offices do not maintain accurate records of the number of active canine teams. The canine program manager told us that canine teams periodically become inactive for a variety of reasons, such as medical leave or temporary reassignment of canine handlers, but the field offices do not change the team's status to inactive in the human capital tracking system, and as a result, the number of active canine handling teams in each

²²GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government*, [GAO-04-546G](#) (Washington, D.C.: March 2004).

quarter may be overstated. The canine program manager also noted that the proficiency data—which are collected quarterly by CBP field offices and forwarded to the agriculture canine program manager in CBP headquarters—have missing values because field offices do not consistently review the data for errors or missing values. When there are missing values, too much time may have elapsed for the canine handler to remember what the correct data should be. According to the agriculture canine program manager, to compensate for these data problems, she maintains a separate record of the current status of each canine team, which is generated from personal communications between her, the field offices, and canine handlers. The agriculture canine program manager also told us she is developing a web-based data reporting system that is intended to have a supervisory review process before the data are submitted; however, she did not have a timeline for this project because it is being developed informally. Without complete and accurate information regarding its canine teams, the AQI program does not have sufficient information to assess the status of the canine teams' proficiency level to ensure agriculture canine inspections are being conducted by qualified canine teams.

- *Some data being collected may not be meaningful.* Specifically, the agriculture canine program is gathering data on the amount of time canine teams actively inspect and intercept pests; however, according to CBP officials, these data are not useful for the AQI program. Before the creation of DHS, the U.S. Customs Service collected these data to measure the cost effectiveness of its drug-detecting canines, and CBP continued to collect these data for agriculture canines. The use of these data to determine the cost effectiveness of a canine program depends heavily on determining the value of the seized contraband, which is not easily determined for agriculture. For example, according to CBP officials, a pound of seized cocaine has an associated street value that can be compared with the cost of performing inspections. For agriculture products, the monetary value of the seized item may be minimal; instead, the value of the activity is in preventing the introduction of a harmful agricultural pest or disease and avoiding the potential economic harm, which, according to CBP, is difficult to project or calculate.

Without sufficiently reliable data, the AQI program cannot assess the effectiveness of the canine program. Furthermore, by collecting data that are not meaningful or useful for assessing the effectiveness of its canine handlers, the AQI program may be using resources to collect data it does not need.

Revise User Fees

In 2006 we recommended that DHS and USDA work together to revise the user fees to ensure that they cover the AQI program's costs.²³ At that time we found that, although the Secretary of Agriculture had the discretion to prescribe user fees to cover the costs of the AQI program, program costs had exceeded user fee collections since the transfer of AQI inspection activities to DHS's CBP. In 2009, APHIS attempted to increase the AQI user fees using an interim rulemaking process that increased AQI user fees by approximately 10 percent. However, later that year they withdrew the interim rule because, according to APHIS officials, stakeholders objected to the lack of a formal comment period in the interim rulemaking process. We have previously reported that APHIS's use of interim rules to adjust user fees limits stakeholder input.²⁴ APHIS officials are exploring other regulatory alternatives for adjusting the fees. In October 2010, APHIS hired a contractor to conduct a comprehensive fee review to determine the full cost of AQI services, identify potential changes to the fee structure, and recommend new fees. APHIS officials estimated that, should APHIS and DHS agree that user fees need to be increased, APHIS will publish a proposed rule by the summer of 2013. GAO is conducting a separate evaluation of the AQI user fees' structure and options for setting and distributing them.

Limitations in the Arrival, Inspection, and Interception Data May Hinder Their Use in Managing the Program

The AQI program uses data on arrivals, inspections, and interceptions to determine how well agricultural inspections identify prohibited materials and to review ports' performance, but data quality issues may prevent AQI program officials from making full use of the data. More specifically, CBP and APHIS officials told us that they determine how well agricultural inspections identify prohibited materials by comparing the actual counts of arrivals, inspections, and interceptions against the existing performance measure of the amount of prohibited agricultural items expected to be found in a specific pathway. In addition, AQI officials use the data to identify annual trends specific to a particular port and to determine whether any changes in the number of inspections or interceptions at that port can be explained by external factors—such as a change in trade or travel patterns—or indicate a performance problem at the port that needs to be corrected. However, we found limitations that may undermine the data's overall usefulness for managing the program. Specifically:

²³GAO-06-644.

²⁴GAO-07-1131.

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- *The data may not be reliable.* According to APHIS officials, data quality is an ongoing issue with the AQI data systems, including the Work Accomplishment Data System (WADS)—the primary repository for arrival, inspection, and interception data. As a result, in 2004, APHIS and CBP created an interagency stakeholder group with a goal of ensuring data quality and accuracy by performing quarterly visual checks of WADS data and providing data quality training to agriculture specialists at the ports upon request. Since 2006, 30 of the 167 ports with agriculture specialists have received this training. At some ports, agriculture specialists record arrivals, inspections, and interceptions every day on paper or spreadsheets and enter this information into WADS at the end of the month, which may affect the reliability of the data by introducing transcription errors. In addition, from 2010 through 2011, the joint CBP-APHIS quality assurance reviews, which focused on 22 ports, found instances of discrepancies between data recorded in WADS and data recorded on daily logs at about half of the ports reviewed (10 out of the 22 ports). For example, at one port that was reviewed, the number of passengers referred to secondary inspection was underreported by nearly 10 percent, and reviews of other ports identified some data that were overreported or had not been recorded. APHIS and CBP officials told us that supervisors review the data monthly at all the ports, and that there is a quarterly review process by the interagency stakeholder group; however both of these reviews rely primarily on a visual comparison of current and historical numbers and thus detect only unusually large changes at a port. According to APHIS officials, the monthly supervisory review process does not require supervisors to compare the numbers in WADS with the daily log sheets or other databases because the policy and procedures do not have specific requirements on how data are to be reviewed. We have previously reported that agencies should ensure that data are free of systematic error or bias and that what is intended to be measured is actually measured.²⁵ According to a senior APHIS official, ensuring AQI data quality and accuracy is a continuing challenge because of various factors, including changes in the APHIS and CBP personnel involved in data collection.

²⁵GAO, *Agencies' Annual Performance Plans under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking*, [GAO/IGD/AIMD-10.1.18](#) (Washington, D.C.: February 1998).

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- *The data cannot be easily analyzed.* WADS captures data on the number of arrivals, inspections, and interceptions independently from one another, and these data cannot be linked without extensive analysis. CBP officials told us that being able to connect a specific arrival to an inspection and the resulting interceptions would be useful information for assessing the effectiveness of targeting activities and inspection procedures. However, the analysis necessary to do so is time consuming and cumbersome, undermining the use of the data for managing the program. In addition, the way in which some data are recorded in WADS complicates analysis, according to APHIS and CBP officials. For example, WADS captures the number of agricultural inspections carried out at individual ports by agriculture specialists. It does not count the number of agricultural inspections carried out by CBP officers when agriculture specialists are not present. Therefore, WADS is not a representation of the total number of agricultural inspections carried out at ports and cannot be used to analyze the number of agricultural inspections conducted in relation to total number of arrivals. In another example, each inspection is counted once in WADS, but the number of interceptions that are recorded from an inspection varies depending on what is found. Specifically, if a passenger were inspected and found to be carrying five different types of fruit, the agriculture specialist would record that result as five interceptions for one inspection. However, if the passenger had five pieces of one type of fruit, it would be recorded as one interception. As a result, it is difficult to analyze the number of agricultural interceptions found in relation to the total number of inspections conducted.
 - *The data have inherent limitations beyond AQI program control.* The number of agricultural arrivals, inspections, and interceptions varies from year to year and by pathway. According to APHIS and CBP officials, the variation is caused by numerous factors, including weather, economics, and politics that affect travel and trade, as well as variances in inspection targeting procedures. For example, arrivals of a commodity from a particular country may drop sharply because of severe weather conditions, such as hurricanes or droughts, or because trade sanctions and embargoes have been put in place for political reasons. APHIS and CBP officials noted that they target inspections on the basis of factors such as pathways, commodities known to be a risk for agricultural pests, country of origin, and a shipper's history of violations. Together, these factors can result in inspection and interception numbers that do not correlate with the number of arrivals for a particular pathway. For example, APHIS officials told us that one pathway, such as cargo trucks, may have a

high number of arrivals, but if the cargo these trucks are carrying is considered a low risk for carrying prohibited pests, then it would be expected that the data for this pathway would show fewer inspections and interceptions.

Some of these data limitations have the potential to affect other key efforts that are currently underway, such as the program's staffing model and the effort to analyze the structure and amounts of AQI user fees—both critical to the AQI program. For example, contractor documents related to the staffing model stated that WADS data are not reliable for understanding the actual workload of agriculture specialists, and that the contractor had to undertake significant effort to make the data usable. Specifically, the contractor's analysis estimated that about 2 percent of pedestrians are inspected by agriculture specialists, but that the data in WADS indicated that agriculture specialists inspected 33 percent of pedestrians.²⁶ In addition, the contractor analyzing user fees noted concerns regarding potentially inconsistent or inaccurate data entry, which could result in decreased confidence with data reporting and analysis. Without reliable data on work activities, AQI program officials cannot be assured that they have the information they need to manage the program.

Survey Responses Show Some Changes in Agriculture Specialists' Views

According to our analysis of agriculture specialists' and supervisors' responses to our 2012 survey and the results from our 2006 survey, some aspects of agriculture specialists' and supervisors' views about their work environment have changed since 2006. The responses to our open- and closed-ended questions show that views about some areas have improved, some concerns expressed in 2006 have persisted, and some concerns have increased. (To view the full results of our survey, please see the electronic supplement to this report, [GAO-12-884SP](#).)

Survey Responses Show Improvement in Some Areas

According to our analysis of the responses to the 2006 and 2012 surveys, agriculture specialists and supervisors believe some aspects of the AQI program have improved since we last reported. Notably, in 2006, "nothing is going well" was the second most common response to our open-ended question, "What is going well with respect to your work as an agriculture specialist?"; in 2012, it was one of the least common responses,

²⁶For the purposes of this report, we did not assess the reliability of the numbers presented in the contractor's analysis.

suggesting that, in general, respondents believe aspects of the AQI program have improved. (See appendix II for a summary of responses to this open-ended question for 2006 compared to 2012.) Based on our analysis of survey results, agriculture specialists and supervisors specifically believe that training and information-sharing have improved.

Training. More agriculture specialists and supervisors at CBP now believe they are sufficiently trained to perform their agriculture inspection duties than did in 2006, according to our analysis of responses to the closed-ended questions in our 2012 survey. Specifically, we estimate that 76 percent of agriculture specialists and supervisors at CBP employed before the merger believe they are definitely sufficiently trained to perform their agricultural inspection duties, and 51 percent employed after the merger believe they are definitely sufficiently trained.²⁷ This represents an increase from 2006, when we estimated 58 and 36 percent, respectively.²⁸ (See table 1.)

Table 1: Estimates for the Closed-ended Question “Do You Believe That You Are Sufficiently Trained to Perform Your Agriculture Inspection Duties?” (in percent)

	Employed before the merger		Employed after the merger	
	2006	2012	2006	2012
Definitely yes	58	76	36	51
Confidence intervals ^a	52.4-62.6	66.6-83.0	28.2-44.3	44.6-58.3
Probably yes	32	19	39	36
Confidence intervals	27.4-37.2	12.3-27.5	31.2-46.6	29.7-42.8
Uncertain	1	4	11	2
Confidence intervals	0.5-2.8	1.3-10.2	7.4-15.5	0.5-4.5
Probably not	4	1	8	5
Confidence intervals	2.7-7.0	0.0-3.6	4.7-13.3	2.4-9.2

²⁷The 95 percent confidence intervals surrounding the estimates of 76 percent and 51 percent of agriculture specialists and supervisors at CBP range from 66.6 percent to 83.0 percent for those hired before the merger and from 44.6 percent to 58.3 percent for those hired after the merger.

²⁸The 95 percent confidence intervals surrounding the estimates of 58 percent and 36 percent of agriculture specialists and supervisors at CBP range from 52.4 percent to 62.6 percent for those hired before the merger and from 28.2 percent to 44.3 percent for those hired after the merger.

	Employed before the merger		Employed after the merger	
	2006	2012	2006	2012
Definitely not	3	0	5	5
Confidence intervals	1.7-6.0	0.0-3.6	2.7-9.0	2.6-9.5
No answer	1	0	2	0
Confidence intervals	0.6-3.9	0.0-1.9	0.4-7.8	0.0-2.1

Source: GAO analysis of survey data.

Notes: Numbers may not add to 100 percent due to rounding.

In 2006, the question was phrased as: "Do you believe you received sufficient training (on-the-job and at the Professional Development Center) to enable you to perform your agriculture inspection duties?"

^aThe shaded rows contain the 95 percent confidence intervals.

Additionally, based on our analysis of the responses to our closed-ended questions, we estimate 28 percent of agriculture specialists and supervisors at CBP believe that the sufficiency of training is not a challenge to conducting agriculture duties at their port, and another 29 percent believe it is only a minor challenge.²⁹ We did not ask about whether or not training was a challenge in our closed-ended questions in 2006, but at that time, training was the fourth most frequent response to our open-ended question, "What would you like to see changed or improved with respect to your work as an agriculture specialist?" Our analysis of the responses to our 2012 survey shows that views about training have generally improved, but out of 406 respondents, we received 68 comments in response to an open-ended question listing certain aspects of training they would like to see changed or improved. For example, some respondents commented that they would like to see more specific or refresher training on agriculture pests that they may encounter on the job, and one respondent commented that he would like the opportunity for more hands-on—rather than web-based—training.

Information-sharing. According to our analysis of 2006 and 2012 survey responses, information-sharing has also improved. Based on the responses to our closed-ended question on whether information is

²⁹The 95 percent confidence interval surrounding the estimate for the 28 percent of agriculture specialists and supervisors at CBP believing that the sufficiency of training is not a challenge to conducting agriculture duties at their port ranges from 23.2 percent to 33.1 percent, and the 95 percent confidence interval surrounding the estimate for the 29 percent ranges from 23.9 percent to 34.1 percent.

delivered in a timely manner, we estimate that 36 percent of agriculture specialists and supervisors at CBP believe that information on agriculture regulatory changes is always delivered in a timely manner, and another 48 percent believe the information is delivered in a timely manner most of the time.³⁰ These views reflect an increase from 2006, when we estimated 17 percent of agriculture specialists and supervisors at CBP believed such information was always delivered in a timely manner, and 38 percent believed it was delivered in a timely manner most of the time.³¹ Additionally, we estimate that, compared with 2006, statistically more agriculture specialists and supervisors at CBP in 2012 believe they always receive information on urgent alerts, pest alerts, and updated pages for the agriculture regulatory manual in a timely manner.³² (See table 2.) We estimate that 57 percent of agriculture specialists and supervisors at CBP in 2012 believe the timeliness of information provided to agriculture specialists is either not a challenge or is a minor challenge to conducting agriculture duties at their port.³³ We did not ask this question in 2006.

³⁰The 95 percent confidence interval surrounding the estimate of 36 percent of agriculture specialists and supervisors at CBP believing that that information on agriculture regulatory changes is always delivered in a timely manner ranges from 30.2 percent to 40.8 percent, and the 95 percent confidence interval surrounding the estimate of 48 percent ranges from 42.3 percent to 53.4 percent.

³¹The 95 percent confidence interval surrounding the estimate from 2006 of 17 percent of agriculture specialists and supervisors at CBP believing such information was always delivered in a timely manner ranged from 14.3 percent to 21.0 percent, and the 95 percent confidence interval surrounding the estimate of 38 percent ranged from 33.4 percent to 41.9 percent. The way the questions were asked varied slightly from 2006 to 2012.

³²The 95 percent confidence interval surrounding the estimate in 2006 of 21 percent of agriculture specialists and supervisors at CBP believing they always receive information on urgent alerts, pest alerts, and updated pages for agriculture regulatory manual in a timely manner ranged from 17.8 percent to 24.9 percent. In 2012, the 95 percent confidence interval surrounding the 34 percent estimate ranges from 28.9 percent to 39.4 percent. The 95 percent confidence interval surrounding the estimate in 2006 of 19 percent ranged from 16.0 percent to 22.9 percent. In 2012, the 95 percent confidence interval surrounding the 33 percent estimate ranges from 28.1 percent to 38.6 percent. The 95 percent confidence interval surrounding the estimate in 2006 of 18 percent ranged from 14.8 percent to 21.7 percent. In 2012, the 95 percent confidence interval surrounding the 37 percent estimate ranges from 31.4 percent to 42.1 percent.

³³The 95 percent confidence interval surrounding the estimate of 57 percent ranges from 51.5 percent to 62.6 percent.

Table 2: Estimates for the Closed-ended Question “Is the Information Delivered to You in a Timely Manner to be Useful?” (in percent)

Type of information	Response											
	Always		Most of the time		Some of the time		Never or almost never		Did not receive		No answer	
	2006 ^a	2012 ^b	2006	2012	2006	2012	2006	2012	2006	2012	2006	2012
Urgent agriculture alerts	21	34	41	47	25	15	7	2	3	1	2	1
Confidence intervals ^c	17.8-24.9	28.8-39.4	37.3-45.8	41.4-52.5	21.4-28.8	11.2-19.5	5.5-10.1	0.8-4.1	1.8-4.3	0.5-3.0	1.1-4.5	0.1-2.1
Pest alerts	19	33	42	47	25	16	8	2	4	2	2	1
Confidence intervals	16.0-22.9	28.0-38.6	37.4-46.0	41.1-52.3	22.0-29.3	11.7-20.1	6.0-10.9	0.7-3.5	2.5-5.3	0.7-3.7	1.0-4.0	0.2-2.9
Regulatory changes	17	36	38	48	26	15	12	1	5	0	2	0
Confidence intervals	14.3-21.0	30.2-40.8	33.4-41.9	42.3-53.4	22.2-29.7	11.2-19.4	9.75-15.4	0.4-3.1	3.3-6.2	0.0-1.6	1.3-4.2	0.0-1.4
Updated pages for agriculture regulatory manual	18	37	31	46	17	10	18	3	14	4	2	1
Confidence intervals	14.8-21.7	31.5-42.2	26.6-34.8	40.3-51.4	13.7-20.2	7.0-13.9	14.9-21.5	1.3-5.1	11.7-17.3	1.8-5.6	1.5-4.2	0.3-3.2

Source: GAO analysis of survey data.

Notes: Numbers may not add to 100 percent due to rounding.

In 2006, the question was phrased as: “Is the information delivered to you in a timely manner?”

^aIn 2006, there were 626 responses.

^bIn 2012, there were 397 responses for urgent agriculture alerts, 394 for pest alerts, and 396 responses each for regulatory changes and updated pages for agriculture manual.

^cThe shaded rows contain the 95 percent confidence intervals.

Survey Responses Show Some Concerns Persist

According to our analysis of the responses to our 2012 survey, some of the concerns agriculture specialists and supervisors at CBP reported in 2006 persist. In particular, concerns remain about CBP’s chain of command, the agriculture mission, and working relationships among co-workers.

CBP’s chain of command. Our analysis indicates that respondents remain concerned about CBP’s chain of command—including concerns about poor communication related to internal policies, supervisors lacking agriculture experience, and the need for an agriculture chain of command that is separate from CBP. In 2006, CBP’s chain of command was the third most frequent response to our open-ended question, “What would you like to see changed or improved with respect to your work as an agriculture specialist?” Similarly, in 2012, it was the category noted most

often as something to be changed or improved. Furthermore, based on our analysis of closed-ended questions in 2012, we estimate that 30 percent of agriculture specialists and supervisors at CBP believe the CBP chain of command is a very major challenge to conducting agriculture duties at their port, and another 23 percent believe it is a major challenge.³⁴ (See appendix II for a summary of responses to the open-ended question, “What would you like to see changed or improved with respect to your work as an agriculture specialist?” in 2006 compared to 2012.) We did not ask about CBP’s chain of command in our closed-ended questions in 2006.

Agriculture mission. As with the results of our 2006 survey, 2012 survey respondents identified the priority given to the agriculture mission among the top four aspects of the AQI program they would like to see changed or improved. Further, we estimate that 39 percent of agriculture specialists and supervisors at CBP believe the priority given to the agriculture mission is a very major challenge to conducting agriculture duties at their port, and another 23 percent believe it is a major challenge based on our analysis of responses to closed-ended questions in 2012.³⁵ Out of 406 survey respondents, 86 respondents identified the priority given to the agriculture mission as something they would like to see changed or improved in response to our open-ended question. Respondents noted that competing priorities sometimes prevented them from performing their missions and that agriculture specialists do not have enough time to complete their tasks, such as looking for pests in agriculture materials intercepted from passengers. Not having enough time to complete agriculture-mission related tasks is a concern for about the same percentage of agriculture specialists and supervisors at CBP in 2012 as it was in 2006. (See table 3.)

³⁴The 95 percent confidence interval surrounding the estimate of 30 percent of agriculture specialists and supervisors at CBP remaining concerned about CBP’s chain of command ranges from 24.4 percent to 34.7 percent, and the 95 percent confidence interval surrounding the estimate of 23 percent ranges from 17.9 percent to 27.4 percent.

³⁵The 95 percent confidence interval surrounding the estimate of 39 percent of agriculture specialists and supervisors at CBP identifying the priority given to the agriculture mission is a very major challenge ranges from 34.0 percent to 44.9 percent, and the 95 percent confidence interval surrounding the estimate of 23 percent ranges from 18.5 percent to 28.0 percent.

Concern for the priority given to the agriculture mission persists, but 91 out of 406 respondents indicated in their response to the open-ended question about what is going well that they believe some aspects of the AQI mission are going well, such as inspections and interceptions.

Table 3: Estimates for the Closed-ended Question “Do You Have Enough Time to Look for Pests in Agriculture Materials Intercepted from Passengers?” (in percent)

	2006 ^a	2012 ^b
Always	10	11
Confidence intervals ^c	8.1-13.0	8.2-15.2
Most of the time	27	31
Confidence intervals	23.0-30.9	25.9-36.1
Some of the time	31	30
Confidence Intervals	27.2-35.4	25.1-35.4
Never or almost never	15	8
Confidence Intervals	12.5-18.5	4.9-10.9
Not applicable	15	18
Confidence Intervals	11.9-17.8	13.4-22.4
No answer	2	2
Confidence Intervals	1.1-3.6	0.9-4.8

Source: GAO analysis.

Notes: Numbers may not add to 100 percent due to rounding.

^aIn 2006, there were 626 responses.

^bIn 2012, there were 400 responses.

^cThe shaded rows contain the 95 percent confidence intervals.

Working relationships. Working relationships among co-workers is still a concern for agriculture specialists and supervisors, according to our analysis of the 2006 and 2012 survey data. Specifically, we estimate a similar percentage of agriculture specialists and supervisors at CBP in 2006 and 2012 believe their work is definitely not respected by CBP management—42 percent in 2006 and 43 percent in 2012—and by CBP

officers—35 percent in 2006 and 28 percent in 2012.³⁶ (See table 4). Respondents identified working relationships in both 2006 and 2012 as one of the most frequent responses to the open-ended question asking respondents what they would like to see changed or improved. In particular, some respondents stated that CBP officers and management do not respect their work or mission, and others noted that agriculture specialists are not treated as part of the team. However, in both 2006 and 2012, respondents also identified working relationships among co-workers as one of the most frequent responses to our open-ended question of what is going well, suggesting that while some aspects of working relationships continue to be a concern, other aspects of working relationships are going well. In particular, some respondents noted that their fellow agriculture specialists were dedicated, highly-qualified, or hard working.

Table 4: Estimates for the Closed-ended Question “In General, Do You Feel that the Work of a CBP Agriculture Specialist Is Respected by CBP Officers and Management?” (in percent)

	Response											
	Definitely yes		Probably yes		Uncertain		Probably not		Definitely not		No answer	
	2006 ^a	2012 ^b	2006	2012	2006	2012	2006	2012	2006	2012	2006	2012
CBP officers	7	8	18	20	14	17	26	28	35	28	0	0
Confidence intervals ^c	4.8-8.8	4.9-11.2	14.9-21.9	15.3-24.0	10.9-17.0	12.8-21.5	22.4-30.0	22.9-33.0	31.3-39.6	22.5-32.6	0.2-0.9	0.0-2.1
CBP management	6	6	14	15	15	15	22	21	42	43	1	1
Confidence intervals	4.1-7.6	3.3-8.7	11.3-17.6	11.2-18.9	12.4-18.6	11.6-20.0	19.1-26.3	16.0-25.2	37.6-46.2	37.7-48.8	0.4-1.3	0.0-2.1

Source: GAO analysis.

Notes: Numbers may not add to 100 percent due to rounding.

In 2006, the question was phrased as: “In general, do you feel that your work as a CBP Agriculture Specialist is respected by CBP Officers and Management?”

³⁶The 95 percent confidence interval surrounding the 2006 estimate of 42 percent of agriculture specialists and supervisors at CBP believing their work is definitely not respected by CBP management ranged from 37.5 percent to 46.2 percent; the 95 percent confidence interval surrounding the 2012 estimate of 43 percent ranges from 37.7 percent to 48.8 percent. The 95 percent confidence interval surrounding the 2006 estimate of 35 percent of agriculture specialists and supervisors at CBP believing their work is definitely not respected by CBP management ranged from 31.3 percent to 39.6 percent; the 95 percent confidence interval surrounding the 2012 estimate of 28 percent ranges from 22.5 percent to 32.6 percent.

^aIn 2006, there were 626 responses.

^bIn 2012, there were 400 responses for CBP Officers and 398 responses for CBP Management.

^cThe shaded rows contain the 95 percent confidence intervals.

Survey Responses Show Increasing Concerns in Some Areas

Our analysis of the responses to the closed-ended questions in our 2012 survey indicates that agriculture specialists' and supervisors' concerns about staffing levels and salary and benefits have increased since 2006. Both of these issues were also mentioned more frequently in 2012 in response to the open-ended question about what they would like to see changed or improved.

Staffing levels. In 2012, respondents identified staffing levels as the second most frequently cited issue they would like to see changed or improved. In 2006, staffing was the sixth most frequently offered response. Furthermore, we estimate that 50 percent of agriculture specialists and supervisors at CBP believe that their port definitely does not have enough agriculture specialists to carry out agriculture duties, and an additional 21 percent believe that their port probably does not, based on our analysis of closed ended questions.³⁷ In 2006, we estimated that 42 percent of agriculture specialists and supervisors at CBP believed their port definitely did not have enough agriculture specialists to carry out agricultural duties, and an additional 21 percent believed that their port probably did not.³⁸ (See table 5.) In addition, in 2012, we estimate that 31 percent of agriculture specialists and supervisors at CBP believe that staffing levels of agriculture specialists is a very major challenge to

³⁷The 95 percent confidence interval surrounding the estimate of 50 percent of agriculture specialists and supervisors at CBP believing that their port definitely does not have enough agriculture specialists to carry out agriculture duties ranges from 44.4 percent to 55.6 percent, and the 95 percent confidence interval surrounding the estimate of 21 percent ranges from 16.2 percent to 25.4 percent.

³⁸The 95 percent confidence interval surrounding the 2006 estimate of 42 percent of agriculture specialists and supervisors at CBP believing that their port definitely does not have enough agriculture specialists to carry out agriculture duties ranged from 37.5 percent to 46.0 percent, and the 95 percent confidence interval surrounding the 2006 estimate of 21 percent ranged from 17.6 percent to 25.1 percent.

conducting agriculture duties at their port, and another 24 percent believe it is a major challenge.³⁹ We did not ask this question in 2006.

Table 5: Estimates for the Closed-ended Question “In Your Experience, Does Your Port Currently Have Enough Agriculture Specialists to Carry Out Agriculture Duties?” (in percent)

	2006	2012
Definitely yes	12	7
Confidence intervals ^a	9.8-15.0	4.6-10.3
Probably yes	16	14
Confidence intervals	12.6-18.9	10.7-18.6
Uncertain	8	7
Confidence intervals	6.2-11.3	4.7-10.9
Probably not	21	21
Confidence intervals	17.6-25.1	16.2-25.4
Definitely not	42	50
Confidence intervals	37.5-46.0	44.4-55.6
No answer	1	0
Confidence intervals	0.5-2.8	0.0-2.1

Source: GAO analysis.

Note: Numbers may not add to 100 percent due to rounding.

^aThe shaded rows contain the 95 percent confidence intervals.

Salary and benefits. Salary and benefits were also higher on the list of things respondents would like to see changed or improved in 2012 compared with 2006. In 2012, salary and benefits was the fourth most mentioned category, compared with 2006, when it was the seventh most mentioned category. Specifically, in 2012, 77 out of 406 respondents identified salary and benefits as something they would like to see changed or improved. In their responses to our open-ended question, respondents mentioned wanting the same retirement system as their CBP officer co-workers, lacking a career ladder for agriculture specialists and

³⁹The 95 percent confidence interval surrounding the estimate of 31 percent of agriculture specialists and supervisors at CBP believing that staffing levels of agriculture specialists is a very major challenge ranges from 25.8 percent to 36.3 percent, and the 95 percent confidence interval surrounding the estimate of 24 percent ranges from 19.6 percent to 29.3 percent.

supervisors, and lacking promotion opportunities. For example, CBP officers are considered law enforcement officers and are generally eligible for full retirement benefits after 20 years of creditable service. Agriculture specialists are not considered law enforcement officers and, generally, become eligible for full retirement benefits after 30 years of creditable service.

Conclusions

The AQI program is a key component of U.S. efforts to protect agriculture from the unintentional or deliberate introduction of pests and disease, and effective management of the AQI program requires a coordinated effort by DHS and USDA. Since we reported in 2006, both DHS and USDA have made progress in implementing our recommendations and overcoming some of the management challenges we identified, including ensuring that user fees are transferred to CBP and that important agriculture information is shared with agriculture specialists in a timely manner.

However, the AQI program continues to wrestle with fundamental problems that undermine the management of the program and risks wasting resources in a fiscally constrained environment. Specifically, in the absence of a strategic plan that lays out the program's joint mission and goals, APHIS and CBP do not have a framework for defining the program's mission, setting goals to achieve the desired results, and identifying performance measures for gauging progress towards those goals.

Furthermore, the agencies may not have sufficient information on which to base key decisions to support the AQI program because the data the two agencies are collecting and using for managing the program may not be reliable. Without ensuring that the data on arrivals, inspections, and interceptions across ports are entered accurately, the AQI program may not have sufficiently reliable data for supporting critical efforts for managing the program. When discrepancies exist between data in WADS and data recorded on daily logs at about half of the ports reviewed by the 2010 to 2011 joint CBP-APHIS quality assurance reviews, it could be an indicator of more widespread data quality issues related to failures with the supervisory review policy and procedures in ensuring that data are entered accurately. In addition, the data supporting the agriculture canine program are hindered by the absence of a timely and consistent data review process at CBP field offices, resulting in incomplete and inaccurate data. Moreover, the agriculture canine program continues to collect some data that may not be meaningful or relevant to the program,

further straining the program's resources. Without sufficiently reliable data, the AQI program cannot assess the effectiveness of the canine program. Furthermore, by collecting data that are not meaningful or useful for assessing the effectiveness of its canine handlers, the AQI program may be using resources to collect data it does not need.

Finally, the agencies may not be using their resources effectively. Having devoted 6 years and hundreds of thousands of dollars in contracts to develop a staffing model, CBP still does not have a risk-based staffing model that provides assurance that those ports of highest vulnerability for the entry of pests and disease are adequately staffed. Furthermore, DHS has not assessed the risk that insufficient resources may pose to implementing the staffing model once it is completed. Without a plan or strategy for how it will implement this staffing model that considers the fiscal resources that may realistically be available, the agency risks investing in a staffing model that it cannot execute. CBP also risks increasing the vulnerability of the agriculture sector to foreign pests and disease or disrupting international trade if agriculture specialists cannot keep up with demand for agriculture inspections. In addition, well-trained supervisory staff are a crucial resource for supporting the agriculture canine teams, but the results of our survey and the joint CBP-APHIS quality assurance reviews indicate that some supervisory staff may not have canine training or experience because of barriers such as a lack of resources at ports and the voluntary nature of supervisory canine training. As a result, supervisors in the AQI program may not have the skills necessary to manage issues unique to the canine program, such as the health and training of the canine. By overcoming these challenges, the United States would be in a better position to protect agriculture from the economic harm posed by foreign pests and disease.

Recommendations for Executive Action

We are making the following six recommendations.

To help ensure the CBP and APHIS agricultural quarantine inspection program protects U.S. agriculture from accidental or deliberate introduction of foreign pests and disease, we recommend that the Secretaries of Agriculture and of Homeland Security work together to take the following three actions:

- Develop a strategic plan for the AQI program that lays out its joint mission and program goals.

-
- Once the strategic plan is completed, as part of a coordinated strategic planning effort, identify corresponding meaningful performance measures for monitoring progress towards those goals.
 - Continue taking steps to improve the reliability of AQI data on arrivals, inspections, and interceptions across ports, including reviewing the supervisory review policy and procedures to ensure the data are entered accurately.

In addition, we recommend the Secretary of the Department of Homeland Security, in consultation with USDA where appropriate, take the following three actions:

- Take steps to ensure the agriculture canine program has reliable and meaningful data, including instituting a timely and consistent review process at CBP field offices, and evaluate the relevance of data collected for the agriculture canine program.
- Develop a plan or strategy for implementing the forthcoming AQI staffing model that assesses the risk of potential fiscal constraints and determines what actions should be taken to mitigate that risk by considering the fiscal resources that may realistically be available to ensure that agriculture staffing levels at each port are sufficient.
- Identify any agriculture canine supervisors who do not have canine training or experience and work with port directors to overcome any barriers to providing formal training.

Agency Comments and Our Evaluation

We provided USDA and DHS with a draft of this report for their review and comment. In their written comments, both agencies agreed with our recommendations, and DHS provided technical comments, which we incorporated as appropriate. USDA's comments appear in appendix III. DHS's comments appear in appendix IV.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to the Secretaries of Agriculture and Homeland Security, the appropriate congressional committees, and other interested parties. In addition, the report is available at no charge on GAO's website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3841 or shamesl@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix V.



Lisa Shames
Director, Natural Resources and Environment

List of Congressional Requesters

The Honorable Susan M. Collins
Ranking Member
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Daniel K. Akaka
Chairman
Subcommittee on Oversight of Government Management,
the Federal Workforce, and the District of Columbia
Committee on Homeland Security and Governmental Affairs
United States Senate

The Honorable Kirsten E. Gillibrand
Chairman
Subcommittee on Livestock, Dairy, Poultry, Marketing, and Agriculture
Security
Committee on Agriculture, Nutrition, and Forestry
United States Senate

The Honorable Dianne Feinstein
United States Senate

Appendix I: Objectives, Scope, and Methodology

Our objectives were to examine the extent to which (1) U.S. Department of Agriculture (USDA) and the Department of Homeland Security (DHS) have implemented recommendations we made in 2006 to improve the Agricultural Quarantine Inspection (AQI) program; (2) data on arrivals, inspections, and interceptions are used for managing the program; and (3) the views of agriculture specialists at Customs and Border Protection (CBP) regarding their work environment have changed, if at all, since our 2006 reports.

To address all of these objectives, we visited or spoke with officials at a nonprobability sample of five CBP ports of entry to observe agriculture work activities and discuss challenges related to conducting agriculture inspections and interceptions. These ports of entry were Austin, Texas; Baltimore, Maryland; Dallas, Texas; Miami, Florida; and San Ysidro, California. We selected these ports of entry based on size; the presence of agriculture specialists, supervisors, and canine handlers; and entry pathways, such as air, sea, and land. Because we used a nonprobability sample, the information we obtained from these visits cannot be generalized to other CBP ports of entry. The visits instead provided us with more in-depth information on the perspectives of various agriculture specialists in these ports of entry about the management of the AQI program.

To examine the extent to which GAO's May 2006 recommendations have been implemented,¹ we interviewed DHS and USDA officials and reviewed documentation related to (1) improving information-sharing, (2) undertaking a full review of DHS's financial management system for the AQI program, (3) removing barriers to timely and accurate AQI user fee transfers from USDA to DHS, (4) adopting meaningful performance measures, (5) establishing a national risk-based staffing model, (6) improving the agriculture canine program, and (7) revising user fees to cover AQI program costs. Specifically:

- To determine the extent to which USDA's Animal and Plant Health Inspection Service (APHIS) and DHS's CBP improved information-sharing, we obtained and reviewed CBP's agriculture information sharing policies and protocols regarding agriculture alerts and policy

¹GAO, *Homeland Security: Management and Coordination Problems Increase the Vulnerability of U.S. Agriculture to Foreign Pests and Disease*, [GAO-06-644](#) (Washington, D.C.: May 19, 2006).

updates, among other things, to evaluate changes since our 2006 report. We discussed these policies with agriculture specialists and supervisors during our site visits. We also interviewed the Deputy Executive Director for Agriculture Operational Oversight to discuss changes in information-sharing policies and protocols since 2006. We conducted a nationally representative survey of agriculture specialists and supervisors at CBP, details of which are discussed below, and analyzed the results to determine the extent to which agriculture specialists and supervisors believe that information-sharing is a challenge.

- To determine the extent to which DHS reviewed its financial management system, we reviewed guidance on procedures for accounting for CBP work activities related to agriculture and interviewed officials with CBP's Budget Group and APHIS's Financial Management Division to discuss how the changes have affected the financial accountability for funds allocated for agriculture quarantine inspections.
- To review how USDA and DHS have removed barriers to user fee transfers, we obtained the updated Memorandum of Agreement signed by the Secretaries of Agriculture and Homeland Security that modified the user fee fund transfer schedule. We also received AQI user fee fund transfer records from APHIS to compare the timing and amount of transfers to the agreed upon amount. We interviewed officials from CBP's Budget Group and APHIS's Financial Management Division regarding the transfers to evaluate whether the steps taken by USDA have resulted in timely and accurate transfers to DHS.
- To evaluate APHIS's and CBP's progress in developing meaningful performance measures for the AQI program, we reviewed strategic planning documents, such as the Plant Protection and Quarantine (PPQ) strategic plan and selected sections of the Office of Field Operations' draft strategic plan, for how AQI activities are incorporated into these plans. We interviewed AQI officials, including PPQ officials with strategic planning responsibilities, CBP officials with the Office of Field Operations Strategic Planning Division, and an official with the APHIS-CBP joint agency task force to discuss the existing AQI performance measures, including how they are used to assess performance, their limitations for measuring key AQI activities, and the extent to which APHIS and CBP are developing additional performance measures for managing the AQI program. We also discussed the extent to which the AQI program has developed a strategic plan with a joint mission and program goals, and we compared this to leading practices we have previously reported on for

federal strategic planning at lower levels within federal agencies, such as planning for individual divisions, programs, or initiatives.²

- To evaluate the extent to which CBP has established a national risk-based staffing model, we reviewed CBP contracting documents related to CBP's efforts to develop a model and interviewed officials from CBP's Office of Field Operations and the Deputy Executive Director for Agriculture Operational Oversight regarding their progress towards, and their implementation plan and strategy for, a model. As part of evaluating the potential impact of the AQI program not having a risk-based staffing model, we reviewed standards for internal control in the federal government.³
- To assess the effectiveness of the canine program, we analyzed and reviewed agriculture canine units' quarterly proficiency scores from fiscal years 2006 through 2011, the agriculture canine training manual, agriculture canine units' leash time data from fiscal years 2006 through 2011, and CBP's agriculture canine daily statistics template. We discussed these with the CBP agriculture canine program manager to determine the extent to which the data can be used for assessing the agriculture canine program. To determine the extent to which the proficiency data have missing values, we compared the number of active agriculture canine teams for each quarter provided by the agriculture canine program manager to the number of canine teams that reported a proficiency score for that quarter and discussed the limitations of this approach with the agriculture canine program manager. We also reviewed the results of APHIS-CBP joint quality assurance reviews from 2010 through 2011, the most recent years for which complete data are available, for those ports that had canine handlers to determine the number of reviews that found canine handlers did not have supervisors with canine training. We also analyzed the results of our survey, discussed below, to determine the extent to which canine handlers believe their supervisor has adequate experience. We interviewed the agriculture canine program manager on training policy and procedures for canine handlers and supervisors, steps CBP has taken to address staffing issues raised in our 2006 report, and data quality issues with the agriculture canine program.

²For example, see GAO, Environmental Justice: EPA Needs to Take Additional Actions to Help Ensure Effective Implementation, [GAO-12-77](#) (Washington, D.C.: Oct. 6, 2011).

³GAO, Standards for Internal Control in the Federal Government, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

- To evaluate how DHS and USDA have revised user fees since 2006, we reviewed *Federal Register* documents relating to APHIS's attempts to revise AQI user fees. We interviewed APHIS officials on their plans for future revisions to the user fee structure. GAO is conducting a separate evaluation of the AQI user fee structure and options of setting and distributing them.

To examine the extent to which data on agriculture arrivals, inspections, and interceptions are used for managing the AQI program, we reviewed DHS and USDA inspection and interception data, related summary reports, and policies. Specifically, we obtained and analyzed data from USDA APHIS's Work Accomplishment Data System for fiscal years 2001 through 2011 and reviewed data collection and entry procedures and definitions of required data elements that may impact the use of the data for managing the program. We reviewed DHS and USDA joint Quality Assurance Reviews— joint agency reports on port compliance with agricultural inspection policy— from 2010 through 2011, the most recent years for which data were available. We reviewed documents related to contractor-led efforts for key aspects of the AQI program to determine how those efforts were impacted by data quality issues. Additionally, we interviewed key program officials at USDA and DHS to discuss the reliability of the data and whether there were limitations in the data that may affect the extent to which these data on agricultural quarantine inspections and interceptions are used to make AQI program decisions. To assess the reliability of arrival, inspection and interception data, we observed data collection and data entry procedures at selected ports of entry; reviewed the finding of CBP-APHIS joint quality assurance reviews from 2010 and 2011; and interviewed agriculture inspectors, supervisors and program managers. We concluded that inspection and interception data in APHIS's Work Accomplishment Data System (WADS) may hinder managers' ability to definitively determine whether patterns observed in inspection and interception data are attributable to real changes in the number of inspections and interceptions, or to errors in the data collection and entry processes. We found that potential weaknesses exist at several places in the data collection process. The process for recording inspections and interceptions varies significantly from port to port. At some ports, inspectors record inspection information on a paper clipboard and then proceed to enter that information into an electronic system following the inspection. However, at other locations, paper records of inspections and interceptions are compiled and entered into electronic form as much as one month after the inspection took place. The multiple steps involved in data entry increase the likelihood of errors; and at some ports, the amount of time that elapses between inspection and

interception activities and data entry reduces the usefulness of inspector recall to correct any ambiguities or errors found in paper records.

To determine the extent to which the views of agriculture specialists regarding their work environment have changed, if at all, since GAO last reported, we conducted a nationally representative survey of agriculture specialists and supervisors at CBP regarding their work environment. The survey consisted of closed-ended and open-ended questions. Specifically, we drew a stratified random probability sample of 556 agriculture specialists and supervisors from the universe of 2,311 specialists in the DHS's CBP who were engaged in agricultural inspection duty as of October 2011 and still engaged in this duty as of February 2012. We excluded 10 respondents from our sample of 556 as out-of-scope because these individuals performed management duties outside of CBP ports. All agriculture canine handlers were placed in one stratum; other strata were defined by the number of specialists at the respective ports. Each sample was subsequently weighted in the analysis to account statistically for all specialists in the population. We received an unweighted response rate of 74 percent. The survey results for the closed-ended questions are generalizable to all agriculture specialists and supervisors at CBP.

Because we followed a probability procedure based on random selections, our sample is only one of a large number of samples we might have drawn. Since each sample could have provided different estimates, we express our confidence in the precision of our particular sample's results as 95 percent confidence intervals. This is the interval that would contain the actual population values for 95 percent of the samples we could have drawn. In developing the survey, we met with CBP and APHIS officials to gain a thorough understanding of the AQI program. We also shared a draft copy of the questionnaire with CBP officials who provided us with comments, including technical corrections, to ensure that the questions were clear and unambiguous, terminology was used correctly, the questionnaire did not place an undue burden on agency officials, the information could feasibly be obtained, and the survey was comprehensive and unbiased. On the basis of the feedback we received, we made changes to the content of the survey. We posted the questionnaire on GAO's survey website. When the survey was activated, the agriculture specialists who had been selected to participate were informed of its availability by an e-mail message that contained a unique user name and password. This allowed respondents to log on and fill out a questionnaire but did not allow respondents access to the questionnaires of others. We sent reminder and follow-up e-mails to

agriculture specialists who had not completed their surveys in a specific time period to increase our response rate. Since this was a Web-based survey, respondents entered their answers directly into the electronic questionnaire, eliminating the need to key data into a database, thus minimizing error. The survey was available from February 6, 2012, until March 9, 2012. Results of the survey are summarized in [GAO-12-884SP](#).

To facilitate comparison with the findings from our prior report, we used a questionnaire for this survey similar to the one we used in 2006. The 2006 questionnaire focused on the transition from agriculture specialists and supervisors in USDA to CBP, and we recognize that there may be demographic shifts in these agriculture specialists and supervisors that we did not calculate. However, we do not believe this affected the results of our analysis. The 2012 survey contained 25 closed-ended questions that asked for opinions and assessments of (1) agricultural inspection training, (2) agricultural inspection duties, (3) agricultural inspection supplies and equipment, (4) communication and information-sharing within CBP and between other agencies, and (5) challenges related to conducting agricultural work activities. Some of those questions were specifically for agriculture canine handlers. In addition, the survey contained two open-ended questions asking for opinions and assessments of what is going well and what could be improved in regards to the work of agriculture specialists. We conducted a content analysis on the responses to the open-ended questions using all of the same categories that were used in 2006, adding new categories as appropriate. We categorized the responses based on the descriptions of the categories from 2006. The responses were placed into as many categories as appropriate; however, each response was placed no more than once in any category. We conducted an independent review of the results and resolved any disagreement.

We conducted this performance audit from August 2011 to September 2012 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.

Appendix II: Summary of Responses to Open-ended Survey Questions in 2006 and 2012

Table 6: GAO Summary of Responses to the Open-ended Question “What Is Going Well with Respect to Your Work as an Agriculture Specialist?” in 2006 Compared with 2012

Category	Description	2006	2012
		Number of comments out of 626 total respondents reflecting this category ^a	Number of comments out of 406 total respondents reflecting this category ^a
Agriculture mission	See improvement in inspections or interceptions; positive mentions of the mission	34	91
Relationships with co-workers (Working relationships)	Relationships with CBP officers are good; receive respect from coworkers	113	66
Salary and benefits	Like salary, overtime, benefits, retirement system, or work schedule	54	35
Equipment, supplies, uniforms	Have tools and supplies needed; likes uniform	18	33
Training	Training is going well, have enough knowledge to do job	50	31
Information-sharing	Receive information from within CBP; good communication with other agencies	25	30
Dedicated agriculture specialists	Fellow agriculture specialists are highly-qualified or dedicated	Not counted ^b	30
Access to databases	Have access to databases; increased ability to target because of access	27	21
“One Face at the Border” initiative	Integration of DHS and USDA good thing; common goals	34	20
Flexibility to do job	Given enough flexibility or time to perform job as see fit; flexible job duties	28	19
I like my job	Like my job; feel performing an important mission	34	16
Nothing is going well	Nothing or not much is going well	93	14
Overall going well	Overall things are going well (no specifics)	10	8
Have a job	Have a job, get paid	28	6
Staffing	Staffing levels are good/adequate	26	4
Other	Statements not frequent enough to be own category	33	37

Source: GAO analysis of survey responses to this question.

^aResponses to this question may have been placed in more than one category.

^bIn 2006, this category was not mentioned frequently enough to be counted separately.

Appendix II: Summary of Responses to Open-ended Survey Questions in 2006 and 2012

Table 7: GAO Summary of Responses to the Open-ended Question “What Would You Like to See Changed or Improved with Respect to Your Work as an Agriculture Specialist?” in 2006 Compared with 2012

Category	Description	2006	2012
		Number of comments out of 626 total respondents reflecting this category ^a	Number of comments out of 406 total respondents reflecting this category ^a
Problems with CBP chain of command	Want separate chain of command for agriculture; want to be separated from rest of CBP (similar to Border Patrol); want agriculture supervisors; supervisors do not understand mission	167	125
Staffing levels	Not enough staff; heavy workload	113	112
Respect or relationships (Working relationships)	Disrespect or lack of comprehension from management or CBP officers regarding mission	190	109
Priority given to the agriculture mission	Weakening of agriculture mission; competing priorities prevent agriculture inspector from performing mission	179	86
Salary and benefits	Salary not enough; lack of promotion opportunities for agriculture specialists; lack of career ladder; issues with retirement policy	97	77
Training	Training opportunities missing or unsatisfactory; training for non-agriculture specialists inadequate	123	68
Overtime policy	Not enough access to overtime; overtime schedule is inflexible	75	50
Policies related to self defense	Concern for personal safety; want to be armed; want self-defense training	59	41
Equipment/supplies	Not enough supplies or funding for supplies; difficulty obtaining supplies; inadequate office space	113	39
Information-sharing	Not receiving information from USDA; difficulty communicating with specialists at other ports; lack of information sharing from other agencies	93	38
Opportunities for temporary assignments	Want opportunities for temporary assignments	37	30
Uniforms	Want different uniform for any reason, including to look different than armed co-workers or for additional durability	Not counted ^b	22
Data/paperwork	Entering required data or completing paperwork is time consuming or inefficient	Not counted ^b	20
Return to USDA	Agriculture mission should be placed back under USDA	61	8
Other	Statements not frequent enough to be own category	117	79

Source: GAO analysis of survey responses to this question.

^aResponses to this question may have been placed in more than one category.

^bIn 2006, this category was not mentioned frequently enough to be counted separately.

Appendix III: Comments from the U.S. Department of Agriculture



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

SEP 14 2012

Ms. Lisa Shames, Director
Natural Resources and Environment
United States Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Shames:

The United States Department of Agriculture (USDA) has reviewed the Draft Report, "Homeland Security: Agriculture Inspection Program Has Made Some Improvements but Management Challenges Persist" (GAO-12-885). As discussed below, USDA agrees with each Recommendation. USDA shares your beliefs that the actions taken to address the recommendations in the May 2006 report, "Homeland Security: Management and Coordination Problems Increase the Vulnerability of U.S. Agriculture to Foreign Pests and Disease" (06-644), have led to significant program improvements, but that challenges do still exist.

GAO Recommendation

To help ensure the CBP and APHIS agricultural quarantine inspection program (AQI) protects U.S. agriculture from accidental or deliberate introduction of foreign pests and disease, we recommend that the Secretaries of Agriculture and Homeland Security work together to take the following action: **Develop a strategic plan for the AQI program that lays out its joint mission and program goals.**

USDA Response

USDA agrees with this Recommendation. USDA will, in conjunction with CBP, develop a joint strategic plan. In 2012, USDA's Animal and Plant Health Inspection Service (APHIS) and CBP reengaged the Joint Agency Task Force, which will meet quarterly to develop a strategic plan by the summer of 2013.

GAO Recommendation

To help ensure the CBP and APHIS agricultural quarantine inspection program protects U.S. agriculture from accidental or deliberate introduction of foreign pests and disease, we recommend that the Secretaries of Agriculture and Homeland Security work together to take the following action: **Once the strategic plan is completed, as part of a coordinated strategic planning effort, identify corresponding meaningful performance measures for monitoring progress towards those goals.**

An Equal Opportunity Employer

Ms. Lisa Shames

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USDA Response

USDA agrees with this Recommendation. Once the strategic plan is completed, we will identify meaningful performance measures for monitoring progress towards our goals. We believe the existing performance measures go a long way in measuring success for a number of pathways, but agree that an effective strategic planning process will enhance the effectiveness of the joint AQI program. The Joint Agency Task Force will work to strategize new measures that strengthen the ability of CBP to measure its effectiveness in the AQI mission. In addition, APHIS hopes to automate its performance measure for the timeliness of urgent pest identification by the end of Fiscal Year 2014. We are also working with CBP on development of a data analysis group to assess pest trends approaching the United States. This group will develop analytical tools to help measure our performance in excluding unwanted pests from the United States. We agree these goals and measures will help strengthen our program, and we will work with CBP to further refine these measures.

GAO Recommendation

To help ensure the CBP and APHIS agricultural quarantine inspection program protects U.S. agricultural from accidental or deliberate introduction of foreign pests and disease, we recommend that the Secretaries of Agriculture and Homeland Security work together to take the following action: **Continue taking steps to improve the reliability of AQI data on arrivals, inspections, and interceptions across ports, including reviewing the supervisory review policy and procedures to ensure the data are entered accurately.**

USDA Response

USDA agrees with this Recommendation. Various data are used to determine the effectiveness of inspections in identifying prohibited material. Data quality has been a point of emphasis since the inception of the Government Performance Results Act (GPRA) and in implementation of GPRA measures for the AQI program. Quality control measures are built into the data collection and reporting system to minimize data entry errors. A monthly review and closeout of all data reported must be performed by a port supervisor to verify the accuracy and completeness of the data reported. Finally, a quarterly review of all data is performed at the headquarters level. Any missing data or apparent anomalies are identified and the port is contacted to determine if the data requires correction.

The GAO Draft report states that “WADS captures data on the number of arrivals, inspections, and interceptions independently from one another and these data cannot be linked without extensive analysis.” The Agriculture Quarantine Activity System (AQAS) contains numerous pre-defined reports to simplify analysis for users at the port, field office, regional office or headquarters level. CBP data systems (e.g., CSIS, ATS, IO04 and IO25) contain detailed information linking a specific arrival, inspection, and interception result. Pre-defined reports available in AQAS allow the user to see inspection results based on the number of positive inspections or based on the number of materials seized from one country of origin. The WADS Program Guide contains a definition of Quarantine Material Interceptions. All ports consistently follow this definition when reporting data. A variation in the number of arrivals, inspections, and interceptions each year does not limit analysis of the effectiveness of the AQI program.

Ms. Lisa Shames

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Sampling of a pathway using Agriculture Quarantine Inspection and Monitoring procedures will detect any changes in the agricultural risk of the pathway. Statistical sampling minimizes the impact of changes in arrivals, inspections, interceptions due to external factors such as weather economic and political factors. Program effectiveness is easily assessed by comparing inspection results to statistical estimates of the approaching risk each year.

GAO Recommendation

In addition, GAO recommends that the Secretary of the Department of Homeland Security, in consultation with USDA, take actions related to the agriculture canine program and the AQI staffing model that assesses the risk of potential fiscal constraints.

USDA Response

USDA will work in consultation with the Department of Homeland Security on issues related to the agricultural canine program and AQI staffing model. For example, APHIS and CBP have formed a Joint Canine Implementation Team to improve CBP's implementation of their canine teams. The group will analyze what data should be used to evaluate the performance and training requirements, as well as assess how potential fiscal constraints will be addressed for the development of AQI staffing models and canine teams. The recent transfer of the agriculture canine program back into the CBP Agriculture Policy and Trade Liaison group will allow CBP to exercise complete control in allocating the sixty-seven percent of user fees it receives to areas such as, employing additional canine teams, strengthen technology infrastructure, and to further assist in the integration of the agriculture canines teams into the rest of the AQI program.

Also, in 2012, USDA contracted with Grant Thornton to perform an evaluation of AQI user fees for the purpose of identifying additional revenues to support processes for improvements in both the canine teams and AQI staffing. This evaluation is in the early stages and the expected completion date has not been determined.

Sincerely,



Edward Avalos
Under Secretary
Marketing and Regulatory Programs

Appendix IV: Comments from the Department of Homeland Security

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



**Homeland
Security**

September 12, 2012

Ms. Lisa Shames
Director, Natural Resources and Environment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report, GAO-12-885 "HOMELAND SECURITY: Agriculture Inspection Program Has Made Some Improvements but Management Challenges Persist"

Dear Ms. Shames:

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

The Department is pleased to note GAO's positive recognition of Customs and Border Protection's (CBP's) efforts to improve information sharing, undertake a full review of DHS's financial management system for the Agricultural Quarantine Inspection (AQI) program, and remove barriers to timely and accurate AQI user fee transfers from the U.S. Department of Agriculture (USDA) to DHS. GAO also noted that CBP has increased staffing levels, increased canine training requirements, expanded management oversight, and, through a joint task force with the USDA Animal and Plant Health Inspection Service (APHIS), expanded performance measures.

The draft report contains six recommendations with which the Department concurs. Specifically, GAO recommends that the Secretaries of Agriculture and Homeland Security work together to:

Recommendation 1: Develop a strategic plan for the AQI program that lays out its joint mission and program goals.

Response: Concur. CBP's Agriculture Programs & Trade Liaison (APTL) and USDA's APHIS have reconvened the Joint Agency Task Force to continue discussions to create and formulate a joint strategic plan. The plan would highlight the joint APTL/APHIS agriculture mission and program goals. Estimated Completion Date (ECD): August 23, 2013

Recommendation 2: Once the strategic plan is completed, as part of a coordinated strategic planning effort, identify corresponding meaningful performance measures for monitoring progress towards those goals.

Response: Concur. APTL and APHIS have convened the Joint Agency Task Force and will discuss next steps on the joint agency performance measures action plan. APTL will identify corresponding meaningful performance measures for monitoring progress toward the agency goals to take corrective action and make improvements. ECD: August 23, 2013

Recommendation 3: Continue taking steps to improve the reliability of AQI data on arrivals, inspections, and interceptions across ports, including reviewing the supervisory review policy and procedures to ensure the data are entered accurately.

Response: Concur. APTL and APHIS have engaged the Joint Agency Task Force and will discuss next steps on the joint agency information management action plan to improve the reliability and oversight of agriculture data. ECD: August 23, 2013

GAO also recommends that the Secretary of Homeland Security, in consultation with USDA where appropriate, should:

Recommendation 4: Take steps to ensure the agriculture canine program has reliable and meaningful data, including instituting a timely and consistent review process at CBP field offices and, evaluate the relevance of data collected for the agriculture canine program.

Response: Concur. CBP and APHIS will develop an evaluation method for reporting, collecting, and analyzing data to assist with risk-based decision making to enhance the program. APTL acquired Agriculture Canine program in August 2012 and will be working with APHIS to evaluate the existing program. Initial discussions are planned for September 2012. ECD: August 23, 2013

Recommendation 5: Develop a plan or strategy for implementing the forthcoming AQI staffing model that assesses the risk of potential fiscal constraints and determines what actions should be taken to mitigate that risk by considering the fiscal resources that may realistically be available to ensure that agriculture staffing levels at each port are sufficient.

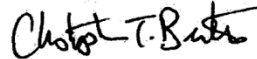
Response: Concur. APTL has been progressing through the Agriculture Specialist Resource Allocation Model sole source contract approval process. In conjunction with the completion/vetting of the model and based on the results, APTL will determine a strategy for implementation. This will include assessing the risk of potential fiscal constraints and determining what actions should be taken to mitigate that risk by considering the fiscal resources that may realistically be available. Coordination with APHIS will continue to transpire throughout the process. ECD: August 23, 2013

Recommendation 6: Identify any agriculture canine supervisors that do not have canine training or experience and work with port directors to overcome any barriers to providing formal training.

Response: Concur. APTL will identify and determine agriculture canine supervisor training needs and coordinate with the field office/port to overcome potential barriers. APTL acquired Agriculture Canine program in August 2012 and will be working with APHIS to evaluate the existing program. Initial discussions planned for September 2012. ECD: August 23, 2013

Thank you for the opportunity to review and comment on this draft report. Technical comments have been provided under separate cover. We look forward to working with you in the future.

Sincerely,



for

Jim H. Crumpacker
Director

Departmental GAO-OIG Liaison Office

Appendix V: GAO Contacts and Staff Acknowledgments

GAO Contact

Lisa Shames (202) 512-3841 or shamesl@gao.gov

Staff Acknowledgments

In addition to the individual named above, Mary Denigan-Macauley (Assistant Director), Adam Anguiano, Carl Barden, Michelle Cooper, N'Kenge Gibson, Amanda Harris, Stuart Kaufman, Kirsten Lauber, Alison O'Neill, and Kiki Theodoropoulos made key contributions to this report. Important contributions were also made by Kevin Bray, Joyce Evans, and Jena Sinkfield.

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