

DEPARTMENT OF HOMELAND SECURITY

# Office of Inspector General

## A Review of the Secure Electronic Network for Travelers Rapid Inspection Program



**Notice:** The Department of Homeland Security, Office of Counsel to the Inspector General, has reviewed this report and excised information according to the Freedom of Information Act, 5 U.S.C. Section 552, as amended.

Office of Inspections, Evaluations,  
& Special Reviews

OIG-04-14

April 2004





# Homeland Security

## Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the Homeland Security Act of 2002 (Public Law 107-296) by amendment to the Inspector General Act of 1978. This is one of a series of audit, inspection, investigative, and special reports prepared by the OIG as part of its DHS oversight responsibility to identify and prevent fraud, waste, abuse, and mismanagement.

This report assesses the strengths and weaknesses of the program or operation under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

The recommendations herein, if any, have been developed to the best knowledge available to the OIG, and have been discussed in draft with those responsible for implementation. It is my hope that this report will result in more effective, efficient, and economical operations. I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in black ink, appearing to read "Clark Kent Ervin". The signature is stylized and written over a vertical line that extends downwards.

Clark Kent Ervin  
Inspector General



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## Abbreviations

AFIS – Automated Finger Print System  
CBP – Customs and Border Protection  
CIS – Central Index System  
CLASS – Consular Lookout and Support System

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CSC – Computer Sciences Corporation  
DACS – Deportable Alien Control System  
DCL – Dedicated Commuter Lanes  
DHS – Department of Homeland Security  
FBI – Federal Bureau of Investigation  
GES – Global Enrollment System  
IBIS – Interagency Border Inspection System  
INS – Immigration and Naturalization Service  
NAILS – National Automated Immigration Lookout System  
NCIC – National Crime Information Center  
NLETS – National Law Enforcement Telecommunications System  
OIG – Office of Inspector General  
POE – Port of Entry  
PortPASS – Port Passenger Accelerated Service System  
SENTRI – Secure Electronic Network for Travelers Rapid Inspection  
TECS – Treasury Enforcement Communications System  
USCS – United States Customs Service  
US-VISIT – United States Visitor and Immigrant Status Indicator Technology  
WIN/AFIS – Western Identification Network/Automated Finger Print System

# OIG

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## *Department of Homeland Security Office of Inspector General*

### Introduction

The Secure Electronic Network for Travelers Rapid Inspection (SENTRI) program permits pre-enrolled travelers to enter the United States by personal vehicle from Mexico with minimal inspection by Customs and Border Protection (CBP) officers. Such reduced border inspection facilitates a more rapid entry into the United States. The SENTRI program is open to both United States citizens and non-citizens; participation is voluntary, fee based, and only for non-commercial vehicles. SENTRI is available at three southern land ports of entry (POE). CBP officers must assess the safety and security risks associated with travelers and their eligibility to enter the United States before the travelers are enrolled. CBP, within the Border and Transportation Security Directorate of the Department of Homeland Security (DHS), is responsible for SENTRI program operations.

The OIG determined that this report contained highly sensitive information that must be protected from general public disclosure. Therefore, this report has been redacted, removing the sensitive information.

### Results in Brief

Program operations were adequate to ensure border security at all three SENTRI land POE. We concluded that the SENTRI program is generally accomplishing the two basic objectives for which it was established: to accelerate the inspection of pre-enrolled low-risk travelers at designated southern United States land POEs; and to maintain border integrity, security, and law enforcement responsibilities.

However, certain program deficiencies must be corrected to enhance the program's overall effectiveness. Specifically, we have several concerns with the SENTRI program that involve program management and oversight at the national level. These concerns begin with the enrollment process and include the lack of uniform thresholds for criminal offenses, financial solvency, and residency, as well as apparent inconsistencies with application approvals and denials. Problems exist in resolving derogatory information from the background checks,

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and with the separation of CBP officer duties in the enrollment process. We noted problems with updating SENTRI system records after initial enrollment, documenting violations, administering penalties, establishing criteria for the frequency of random compliance inspections, and documenting the results of compliance inspections. Taken as a whole, our concerns indicate weak program management that could jeopardize the program's integrity and border security.

Moreover, a senior manager of the United States Visitor and Immigrant Status Indicator Technology (US-VISIT) program told us that SENTRI might play a cornerstone role in US-VISIT. Although SENTRI's precise relationship to US-VISIT has not been settled, the data on pre-screened travelers contained in SENTRI will be useful to US-VISIT's operation, and US-VISIT is scheduled to be implemented at the 50 busiest land POEs this year, including the POEs where SENTRI now operates. Consequently, some convergence between the two is foreseeable, and SENTRI should be strengthened in accordance with our recommendations for the additional reason that it may support US-VISIT.

We are recommending that CBP establish (1) minimum and objective thresholds for violations, arrests, and convictions to evaluate applicants; (2) establish procedures for resolution of hits generated by background checks; (3) establish minimum thresholds when determining financial solvency and residence; (4) establish separation of duties in the enrollment process; (5) perform routine and timely system queries to monitor a participant's continued eligibility; (6) provide a plan and schedule to achieve lookout system connectivity; (7) document resolution of secondary inspections and establish appropriate compliance check rates; (8) identify and record violations resulting in penalties; (9) develop performance data to evaluate and improve the program's overall effectiveness and contribution to border security; and (10) finalize guidance and standard operating procedures to insure uniform program implementation.

## Background

SENTRI is a land border management program that allows CBP to accelerate the inspection of pre-enrolled travelers at designated southern United States land POEs, while maintaining border integrity, security, and law enforcement responsibilities. The SENTRI program is open to both United States citizens and non-citizens. Participation is voluntary, fee based, and is only for use with non-commercial vehicles. The current enrollment period is two years.<sup>1</sup>

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<sup>1</sup> On February 28, 2003, the enrollment period for the SENTRI program was extended from one to two years.



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To enroll in and use the SENTRI program, applicants must demonstrate that they pose low risk to border security and are eligible to enter the United States lawfully. The program incorporates: (1) pre-enrollment of the applicant that includes an initial interview with CBP officers; (2) various agency law enforcement database and criminal record background checks; (3) adjudication of the application; (4) an inspection of the applicant's vehicle; and, (5) a final interview with CBP officers.

The SENTRI program currently operates at three land POEs on the southern border: Stanton Street Bridge, El Paso, Texas; Otay Mesa, California; and San Ysidro, California. SENTRI enrollees use the SENTRI Dedicated Commuter Lanes (DCL) at these POEs to gain expedited entry into the United States. Currently, there are three DCLs at the Stanton Street Bridge, one at Otay Mesa, and two at San Ysidro. There are two Enrollment Centers, one at the Ysleta POE in El Paso, Texas that services the Stanton Street Bridge POE, and another in Otay Mesa, California, which services both the Otay Mesa and San Ysidro POEs.

The SENTRI program involves enrollment of three components: the driver of the vehicle, passengers authorized to be in the vehicle, and the vehicle itself. Enrollees, both drivers and passengers, are issued Port Passenger Accelerated Service System (PortPASS) identification cards, and the vehicle is issued a transponder that is affixed to the windshield. Only SENTRI enrollees and pre-registered vehicles may use SENTRI DCLs.

A critical component of the SENTRI program is the Global Enrollment System (GES). GES is SENTRI's computer system that contains electronic files for all enrollees. GES supports management of the SENTRI program in determining eligibility; processing the applicant; verifying or denying enrollment, and performing system administration, including updating records. Information contained in GES includes digitized photographs of the driver and all authorized passengers, their citizenship and immigration status, and vehicle identification information.

(b) (2) High r crossings made by all enrollees. (b) (2) High  
(b) (2) High, enrollees are referred to secondary inspection to ensure the enrollee's compliance with SENTRI program rules and regulations. In addition, officers may place an interdiction or "lookout" message in GES to alert the CBP officer that the vehicle or any occupant is wanted for various alleged violations of law or inadmissibility.

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Originally developed and implemented by Electronic Data Systems (EDS), Computer Sciences Corporation (CSC) is the current CBP contractor supporting GES. GES is a local stand-alone system at each Enrollment Center; there is no link or shared information through GES between the Enrollment Centers, other land POEs, or CBP headquarters. The integration of enrollment systems into a single GES is planned. CBP officials said the integration is planned for September 2004.

GES provides information to the CBP officer in advance of an enrollee's arrival at the inspection booth. The system automatically identifies the driver, vehicle, and authorized passengers. The SENTRI inspection process consists of: (1) accessing enrollee information, digitized photographs of enrollees, and vehicle identification information maintained in the GES; (2) accessing data by enrollee identification number when the enrollee slides his/her PortPASS card through a magnetic stripe reader; and (3) a visual comparison, by CBP officers, of the vehicle and its passengers against GES displayed data.

When the enrollee approaches the border in a SENTRI DCL, the radio frequency of the transponder queries GES. Each transponder has a unique radio signal that correlates to a specific record in GES. Once identified, a signal is sent to GES to locate data about the vehicle and its authorized occupants. This data is temporarily stored for later use. As the vehicle continues through the DCL, a second set of sensors is activated and within seconds sends the temporarily stored information to the GES computer monitor in the inspection booth. The CBP officer then has all of the required information needed to validate the vehicle and authorized occupants. The following information is displayed on the GES screen: the license number and state issuing the plate; the make, model, color, and identification number of the vehicle; and digitized pictures of the approved SENTRI enrollees with their names and citizenship.

Simultaneously, automatic digital license plate readers and computers perform queries on the vehicle against law enforcement databases. License plate data is automatically available to the CBP officer by viewing the Treasury Enforcement Communication System (TECS)<sup>2</sup> computer that is also located in their booth. In addition, the officer may manually access TECS to perform name queries.<sup>3</sup> This combination of information provides officers with updated data concerning the vehicle, driver, and any possible association with criminal activity.

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<sup>2</sup> CBP headquarters told us that, in the future, TECS would be referred to as the Interagency Border Inspection System (IBIS). We choose to use the term "TECS" throughout this report because SENTRI field officials currently use this term at land POEs.

<sup>3</sup> Automatic digital license plate readers exist on all travel lanes, not just the DCLs, and are linked to TECS, not to SENTRI's GES.

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Upon reaching the booth, the driver of the vehicles stop and slide his or her PortPASS cards through a magnetic stripe card reader. Based on initial program development information, the original intent of the PortPASS card was to access enrollee identification data when the card was passed through a magnetic stripe reader. However, in practice, the PortPASS card and the card reader system are not tied to any component of SENTRI's GES. Once the CBP officer visually verifies the occupants of the vehicle against the GES information and reviews applicable admissibility documents, the enrollee and passengers may enter the United States. If CBP officers are unable to make positive verification of the vehicle or occupants, they may send the vehicle and its occupants to a more intensive, secondary inspection.<sup>4</sup>

To monitor the continued eligibility of an enrollee, the entire SENTRI enrollment database is reviewed in TECS on a 24-hour basis. The purpose of this review is to compare enrollee names against current law enforcement databases to identify criminal activity or immigration violations that have occurred since enrollment. When the review is complete, CBP officers manually review the TECS reports and, when warranted, manually place an interdiction in the enrollee's GES electronic file so that officers have this information available on the GES monitor in the inspection booth. By running the daily TECS review, any new adverse information would be immediately available to officers on the GES monitor in the inspection booth. CBP officers may then take appropriate actions when the SENTRI traveler approaches the inspection booth.

The SENTRI program is fee based. Payment of fees may be made by credit card, personal check, money order, or United States currency.<sup>5</sup> There is a \$25.00 application fee and a \$24.00 fingerprint fee collected at the time of the initial interview. Both fees are non-refundable. A final system fee of \$80.00 is collected at the time of the final interview and vehicle inspection. If an enrollee wishes to register more than one vehicle for use in the SENTRI DCL (maximum of four vehicles), or an enrollee wishes to register as a passenger in more than one vehicle (maximum of eight persons per vehicle), an additional fee of \$42.00 per vehicle is assessed. The two-year enrollment renewal fee is \$105.00. The renewal process is similar to the initial application; however, renewal applications may be submitted by mail and an enrollee interview by CBP officers is not required,

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<sup>4</sup> During a secondary inspection, the vehicle and its occupants are directed to an area away from SENTRI DCLs and regular lanes where CBP officers may perform a more intensive questioning of the travelers, verification of their admissibility documents by querying various databases, and an inspection of the vehicle.

<sup>5</sup> The Enrollment Center at Ysleta in El Paso, Texas does not accept credit cards.

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unless CBP officials deem it necessary. If an enrollee does not renew enrollment, the transponder is deactivated, DCL use is not permitted, and the PortPASS and transponder are recovered by CBP. If a PortPASS card or vehicle transponder is lost, damaged, or stolen, enrollees are charged \$25.00 to replace a PortPASS card and \$42.00 to replace a vehicle transponder.

SENTRI was first implemented as a pilot program at the Otay Mesa, California land POE on November 1, 1995. It later became operational at the Stanton Street Bridge land POE in El Paso, Texas in September 1999, and at the land POE in San Ysidro, California during September 2000. For calendar year 2002, both San Ysidro and El Paso ports ranked in the top five busiest United States land border gateways, processing approximately 29 million northbound personal vehicles in regular lanes and SENTRI DCLs.<sup>6</sup> As of December 17, 2003, there were approximately 66,000 enrollees in the SENTRI program; 17,509 in Texas; and, 48,357 in California.<sup>7</sup> The primary users of SENTRI DCLs were United States citizens (62 percent) and citizens of Mexico (36 percent), and the countries of Japan, Korea, Canada, Spain, China, the United Kingdom, Argentina, and others comprising the remaining 2 percent.

Prior to the creation of DHS on March 1, 2003, the Immigration and Naturalization Service (INS) and the United States Customs Service (USCS), through a memorandum of understanding, dated August 11, 1994, shared responsibility for this program. Historically, INS was primarily responsible for program funding, while staffing was a shared responsibility of both services. Now that legacy INS and USCS components have merged into CBP, both will share responsibility for SENTRI program oversight, implementation, funding, and staffing.

## Purpose, Scope, and Methodology

Our review of the SENTRI program was designed to determine whether program protocols and eligibility criteria have been established and observed in the evaluation and assessment for determining an applicant's low risk for enrollment. Specifically, we examined the processes and procedures to prevent and detect fraud, identify mala fide applicants, and interdict violators. The review assessed

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<sup>6</sup> U.S. Department of Transportation, Bureau of Transportation Statistics, special tabulation, July 2003. Based on the following primary data sources: U.S. Department of Treasury, U.S. Customs Service, Office of Field Operations, Operations Management Database (Washington, DC: 2002).

<sup>7</sup> Data provided by the CBP contractor, CSC, for the El Paso, Texas and Otay Mesa, California Enrollment Centers, December 17, 2003.

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the integrity of the SENTRI program and evaluated whether uniform and consistent diligence is applied to ensure that only qualified applicants are enrolled in and remain enrolled in the program. We analyzed the following:

- Documentation pertinent to the SENTRI program, including draft program guidance, a draft directive, draft standard operating procedures (dated August 10, 2003), policy memorandums, Federal Register notices, Internet websites, and various news articles.
- “Inspection of the Secure Electronic Network for Travelers’ Rapid Inspection,” Report Number 1-2000-019, Inspections Division, Office of the Inspector General, United States Department of Justice, June 2000.
- Code of Federal Regulations Title 8—Aliens and Nationality, Part 103—Powers and Duties; Availability of Records, Part 235—Inspection of Persons Applying for Admission, Part 286—Immigration and User Fee.
- Land Border Ports of Entry: Vulnerabilities and Inefficiencies in the Inspections Process, General Accounting Office report, GAO-03-1084R, August 18, 2003.

We interviewed CBP headquarters officials and staff at all SENTRI land POEs and Enrollment Centers. We conducted site visits at Otay Mesa and San Ysidro, California and El Paso, Texas. We also interviewed CBP’s contractor for SENTRI, CSC, and obtained program data contained in GES.

At each Enrollment Center, we reviewed 300 SENTRI applicant files in the following categories: 90 approved first time enrollment files, 90 enrollment renewal files that had been approved; 45 denied first time enrollment files, 45 denied enrollment renewal files, and 30 revocation files. We reviewed these files to determine content, uniformity, and consistency of documentation requested of applicants and reviewed by CBP officers to determine an applicant’s risk level and continued eligibility.

Our fieldwork was conducted from November 2003 to January 2004. The review was conducted under the authority of the Inspector General Act of 1978, as amended, and according to the Quality Standards for Inspections issued by the President’s Council on Integrity and Efficiency.

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## Findings

### Expedited Border Crossings

The SENTRI program has clearly achieved one of its primary objectives—to accelerate the inspection of pre-enrolled low risk travelers at designated southern United States land POEs. Typically, the time an enrollee will spend waiting to cross the border in a DCL from Mexico into the United States, as compared to waiting times experienced by border crossers in regular lanes, is considerably less for three distinct and measurable reasons: enrollees have previously submitted pertinent information about their citizenship or immigration status and admissibility; their status has been verified and background checks performed to determine a lower risk associated with the enrollees; and, CBP officers have access to this critical information at time of entry. However, to the traveler, the attraction of SENTRI is not the small savings of time during examination by CBP officers. The greater attraction is the access to comparably less congested traffic lanes reserved for SENTRI participants, which thereby enables them to avoid the frequent travel delays that arise at the POEs.

Because CBP officers already have considerable information about SENTRI users before they get to the inspection booth, they do not have to spend as much time reviewing documents and asking questions during the inspection. CBP estimates the waiting time for an enrollee using SENTRI DCLs averages about 10 seconds as compared to a waiting time of 30 to 40 seconds in regular lanes. During our site visits to all SENTRI land POEs, we confirmed the same average time savings.

From January 1, 2003, to December 12, 2003, approximately 3.5 million vehicles were processed through all SENTRI DCLs.<sup>8</sup> To illustrate the impact of a 20-second increase in inspection time, we calculated that CBP would need much more time to inspect the 3.5 million vehicles in regular lanes than it would need to process the same number of vehicles through SENTRI DCLs. If the same number of vehicles were processed through regular inspection lanes, it would take the approximate equivalent of 2.22 additional years to inspect these vehicles.<sup>9</sup> Although other variables could affect the equation, the reduction of 2.22 years, in

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<sup>8</sup> Data provided by the CBP contractor, CSC, December 17, 2003.

<sup>9</sup> 3.5 million vehicles x 20 seconds = 70,000,000 seconds = 2.22 years.

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inspection time may translate into a significant resource savings for CBP as well as a significant saving of time for travelers.

## Low Risk Travelers

We have several concerns with program management practices associated with SENTRI applicant risk determination; specifically, the lack of uniform thresholds for criminal offenses, financial solvency, and residency, as well as apparent inconsistencies with application approvals and denials. Also, problems exist in resolving derogatory information from the background checks and with the separation of CBP officer duties in the overall enrollment process. However, we did not identify any cases of improper enrollment in the SENTRI program and found that all required background checks were conducted.

### Eligibility and Pre-enrollment

To be eligible for enrollment in SENTRI, all applicants must meet one of the following citizenship or immigration status qualifications:

- A citizen of the United States
- A lawful permanent resident of the United States
- A citizen of Mexico who is admissible into the United States as a non-immigrant and holds a valid non-immigrant visa or border-crossing card, who crosses the border at a designated SENTRI DCL land POE
- A citizen of Canada and a landed immigrant who is admissible into the United States as a non-immigrant, and who crosses the border at a designated SENTRI DCL land POE
- A citizen of another country who is admissible into the United States as a non-immigrant or other category authorizing temporary entry to the United States, which may include those having received a waiver of special registration processing, who crosses the border at a designated SENTRI DCL land POE

The enrollment process begins when an applicant submits the Form I-823, Application - Alternative Inspection Services, to the SENTRI Enrollment Center in person or by mail.<sup>10</sup> All SENTRI program applicants must submit a completed Form I-823 before enrollment is considered, irrespective of whether

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<sup>10</sup> Form I-823 is also submitted at each enrollment renewal and when updating existing enrollment records, such as to report a change in vehicle or addition or deletion of an enrollee.

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they intend to use SENTRI DCLs as a driver of a vehicle or as a passenger. With the application, applicants must provide originals of the following applicable citizenship or immigration documents:

- Evidence of United States citizenship
- A valid passport, visa, or other entry document<sup>11</sup>
- Evidence of lawful permanent residence in the United States

Applicants must further provide original documents to establish:

- Employment or financial solvency
- Residence

Some examples of documents that may be submitted to establish employment or financial solvency are salary pay stubs, bank statements, parental support certifications, or business licenses. Residency may be established with utility bills, or rental or mortgage payment receipts. If an applicant is applying for enrollment of a vehicle, originals of the following documents must also be provided:

- A valid driver's license issued by the state where residence is established
- Current vehicle registration
- Current automobile insurance

Once an application is completed, CBP officers conduct an initial interview with the applicant to determine potential eligibility. The initial interview is an opportunity for the CBP officer to evaluate the completeness of the I-823, to review and verify supporting documentation, to elicit and ascertain additional information from the applicant, and to resolve any conflicting information. Upon successful completion of the initial interview, the enrollment fee of \$49.00 is collected, an applicant's fingerprints are taken,<sup>12</sup> copies of all documents are made, a hard copy file is created, and an applicant is pre-enrolled in GES.

If, during the initial interview, the CBP officer believes that false information or documentation has been presented, or the applicant is not eligible for participation in SENTRI, the officer confers with the Enrollment Center supervisor to initiate action to resolve issues or to deny the application.

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<sup>11</sup> Even applicants from the 27 Visa Waiver countries allowed 90-day entries into the United States under the Visa Waiver Permanent Program Act of 2000, Public Law 106-396, must have a visa to enroll in SENTRI.

<sup>12</sup> Minor applicants under the age of 14 are not fingerprinted.



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During the pre-enrollment process, CBP officers enter biographic information into GES, which creates a permanent PortPASS identification number that is assigned to the applicant. This identification number is printed on the PortPASS card and issued to the applicant at the final interview. At pre-enrollment, CBP officers have input access into GES for the following screens: Applicant Name and Date of Birth, Type of Application, Applicant Biographic Information, Applicant Passport/ Visa Information, and Applicant Status.

CBP has established an internal control for immigration documents to capture instances where an applicant's visa or immigration status will expire within the two-year SENTRI enrollment period. CBP officers manually place a flag in GES when an immigration document expires before the initial enrollment period; in such cases the enrollment is authorized only for the period of admissibility into the country afforded the applicant. This information is automatically accessible to the CBP officer when the traveler uses the SENTRI DCL.

Every applicant record at pre-enrollment is categorized as "pending" until all criminal and other background checks are completed.<sup>13</sup> As of December 17, 2003, the total number of pending pre-enrollments at both Enrollment Centers was approximately 4,100. The majority of pre-enrollments in the pending category are processed within 60 days or less.

### Background Checks

CBP uses an array of background checks to identify low risk travelers and to confirm other information presented by the applicant. Fingerprints taken at the initial interview are sent to the Federal Bureau of Investigation's (FBI) National Crime Information Center and to the Western Identification Network/Automated Finger Print System for criminal and terrorist background checks. In addition, the following background checks are performed for all SENTRI program applicants 18 years or older to find any possible criminal or immigration violations.<sup>14</sup>

- Central Index System (CIS)
- Deportable Alien Control System (DACS)
- National Automated Immigration Lookout System (NAILS)

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<sup>13</sup> At pre-enrollment, applicants are not authorized to use SENTRI DCLs.

<sup>14</sup> A detailed explanation of SENTRI background checks and system queries is outlined in Appendix A.

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- Interagency Border Inspection System (IBIS)

For applicants who are enrolling a vehicle, additional background checks are performed for all SENTRI program applicants 18 years or older to confirm vehicle registration information, driver license records, border crossing, and address:

- Treasury Enforcement Communications System (TECS)
- National Law Enforcement Telecommunication System (NLETS)

As various background checks are completed, CBP officers note the completion and results of these checks in the Applicant's Daily Log. When all of the background checks are completed, the applicant's file is reviewed to determine eligibility for the SENTRI program.

#### Application Adjudication

Only CBP officers can make the determination to enroll an applicant into the SENTRI program. Enrollment in SENTRI is granted only to low risk travelers. If an applicant's low risk was not demonstrated or cannot be established through the application procedure, the applicant is ineligible for the program. CBP officers consider several factors when evaluating applications and determining low risk. Applicants may not be low risk if they:

- Have provided false, misleading, or incomplete information on the application
- Have been convicted of a criminal offense or have pending criminal charges
- Have violated customs, immigration, or other federal law, or the laws of another country
- Are inadmissible to the United States
- Are associated with high risk groups,<sup>15</sup> activities, or CBP cannot determine criminal or residence history
- Are subject to processing at entry that requires repeated secondary referrals<sup>16</sup>

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<sup>15</sup> High-risk groups may include people known by law enforcement agencies to have engaged in or been convicted of criminal violations of law such as alien smuggling and narcotics trafficking. An applicant's association with a person engaged in or convicted of criminal violations may be grounds for the denial of the application.

<sup>16</sup> For example, those who are subject to additional registration requirements, such as those under the National Security Entry Exit Registration System, which requires visitors to the United States from specific countries to register upon arrival and departure.

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Using the above criteria, CBP officers use considerable discretion in determining that an applicant is low risk. For example, if an applicant submits misleading or false information on the application or omits information, CBP officers are able to consider whether this action appears to be unintentional or results from a misunderstanding. In addition, CBP officers consider whether this corrected or omitted information would have been prejudicial to eligibility had it been included on the application.

When an applicant admits to having a criminal history, CBP officers may consider whether it was for an arrest or a conviction. If an arrest, there may be consideration of the number of arrests, the nature of offenses, and when they occurred. If a conviction, they may consider whether it was a felony or a misdemeanor, the sentence imposed and served, when it occurred, whether a waiver of inadmissibility was granted, whether there was any form of relief or leniency by the court, and any evidence of rehabilitation.

#### Minimum Thresholds for Adjudicating Applications

CBP has not established thresholds for allowable violations, arrests, or convictions before an application must be denied. CBP officers use considerable discretion in determining an applicant's low risk. While we agree that rigid standards may not be useful, CBP has not provided its officers with guidelines to assist them when reviewing applications. CBP officers generally understood what types of criminal backgrounds, i.e., narcotics or alien smuggling violations, are immediate causes for application denial. They were uncertain, however, about what type and how many minor offenses might be allowed before an application should be denied. For example, at one Enrollment Center, an applicant who had multiple immigration arrests and violations had been approved for enrollment. Further evidence of the discretion permitted in approving applications is revealed by an examination of the denial rates at both Enrollment Centers. From the beginning of the program at each land POE to December 17, 2003, there were 4,122 total applications for enrollment that were denied for the reasons stated in the chart on the following page.<sup>17</sup>

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<sup>17</sup> Data provided by the CBP contractor, CSC, December 17, 2003.

### Denied Applications

Reasons for Denial	Ysleta Enrollment Center El Paso, TX	Otay Mesa Enrollment Center, Otay Mesa CA	Total
A - IBIS Hit INS	1	142	143
B - IBIS Hit Customs	3	58	61
C - IBIS Hit NCIC	13	275	288
D - IBIS Hit CLASS	1	32	33
E - Ineligible Country	0	3	3
F - Non-Business Traveler	0	13	13
G - Non-Frequent Traveler	0	110	110
H - Smuggling Customs	0	40	40
I - Smuggling INS	0	233	233
J - Others	57	2,133	2,190
K - Out of Status	0	269	269
L - Failure to Disclose Criminal History	3	518	521
M - Failure to Disclose Immigration History	1	217	218
<b>Total Denials</b>	<b>79</b>	<b>4,043</b>	<b>4,122</b>

From the beginning of the program at each Enrollment Center to December 17, 2003, the total number of applications (80,292) made for enrollment in SENTRI was 19,820 at the Ysleta Enrollment Center in El Paso, Texas; and, 60,472 at the Otay Mesa Enrollment Center in California. Using these figures and the total denied applications, the applicant denial rate at Ysleta was approximately 0.4 percent, versus a denial rate at Otay Mesa of approximately 6.7 percent. Also, we examined some of the characteristics of the populations applying at the two Enrollment Centers. We concluded that the two populations applying for enrollment at both Enrollment Centers had similar citizenship and immigration status. We would expect the denial rates at the two Enrollment Centers to be similar. Instead, the denial rate varied by more than six percent between the Enrollment Centers. This suggests that the two Enrollment Centers are applying different standards. We attribute this variance to CBP officials' not clearly defining program eligibility criteria.

Thresholds should be established to provide CBP officers, Enrollment Center supervisors, and senior port officials with the ability to make low risk applicant determination within definable, defensible, consistent, and measurable parameters. This guidance should include thresholds that define denial criteria for the types and numbers of minor violations and offenses that may be permitted before an application must be denied. Establishing thresholds is important to ensure the integrity of the SENTRI program. Uniform application of set .....

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standards reduces “port shopping” by *mala fide* applicants and provides more equitable treatment for all applicants.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 1:** Provide a statement of program eligibility criteria that establishes a minimum and objective threshold for violations, arrests, and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI.

### **Adjudicating Background Checks**

If the background checks uncover derogatory information, the CBP officer must ensure that the check has correctly identified the applicant. Some “hits” prove to be erroneous because of similarities in names, misspellings, incorrect addresses, or other such reasons. The match may correctly identify the applicant, but there may be mitigating reasons that justify continuing the application process. In any case, the information must be resolved favorably for the application process to go forward.

Both Enrollment Centers processed background checks in a uniform and consistent manner and performed all appropriate system queries as outlined in draft program guidelines. We identified, however, some discrepancies involving the resolution of hits received on the background checks and record keeping. For example, of the 88 approved first time enrollment files we reviewed at the Ysleta Enrollment Center in El Paso, Texas, 10 files or approximately 11 percent, had background check printouts indicating a hit or match, but no indication of how the hit was favorably resolved, or even whether it was resolved. Further, the printouts sometimes did not contain the name of the applicant, so it was impossible to tell how or whether the printout pertained to the applicant. More complete documentation should be included in the files to describe how background check hits were adjudicated to support a favorable resolution adequately and to avoid the possible perception that negative information was not satisfactorily resolved before the application was approved. At the Otay Mesa Enrollment Center in California, of the 90 approved first time enrollment files we reviewed, all background checks returning derogatory information were resolved and noted in the file.

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We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 2:** Establish procedures for all SENTRI Enrollment Centers that define how CBP officers resolve hits generated by background checks and how they document such resolution in the applicant files

**Eligibility Criteria for Employment, Financial Solvency, and Residence**

Eligibility criteria used by CBP officers to determine the employment or financial solvency and the residency of applicants is not uniform. For example, at the Otay Mesa Enrollment Center, applicants must establish employment or financial solvency by meeting a \$12,000 per year income threshold for enrollment consideration, and provide financial documents for the last three months. At the Ysleta Enrollment Center, however, there is no established threshold for employment or financial solvency, and financial documents are requested for only one month. Similarly, when determining residency, Otay Mesa applicants are requested to provide documentation for three months, but Ysleta applicants are requested to provide documentation for only one month.

Establishing employment or financial solvency and residency are critical elements to ensuring the integrity of the SENTRI program and border security. Financially insolvent applicants or applicants without a permanent residence are more likely to become aliens illegally residing in the United States. In addition, such applicants may be more likely to enter the United States to engage in criminal or terrorist activity. Uniform and consistent thresholds can reduce the opportunity to misrepresent financial status and place of residence. Uniform employment, financial solvency, and residency requirements must be established so that applicants for enrollment are not held to different standards by different Enrollment Centers.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 3:** Develop a uniform minimum economic threshold to establish employment or financial solvency, and develop a uniform timeframe for documents requested to establish both employment or financial solvency and residency.

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### **Separation of Duties in the Enrollment Process**

An additional control to help ensure the integrity of the SENTRI enrollment process is the separation of duties between CBP officers performing the various enrollment functions. One Enrollment Center has an established business practice that CBP officers conducting initial interviews, performing background checks, and adjudicating applications may not render the final approval for the same application. This separation of duties is intended to reduce the opportunities for fraud, abuse, and corruption. Involving more than one CBP officer in the process reduces the chance that a corrupt officer can improperly review, adjudicate, or approve an ineligible applicant for enrollment. Having another officer review the completeness of an application for final enrollment approval also serves as an internal quality control mechanism to ensure various enrollment functions are properly conducted. At the other Enrollment Center, the same CBP officer is permitted to conduct the initial interview and perform background checks and application adjudication, as well as approve the application for final enrollment. The CBP officer making the final enrollment decision should not be the same officer conducting the initial applicant interview and performing background checks and application adjudication.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 4:** Establish a policy to require the separation of duties to ensure that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.

### **Vehicle Inspection and Final Interview**

If CBP determines that an applicant is not qualified for participation in SENTRI, the application is denied. Applicants must wait 90 days from the date of the denial to reapply. When CBP officers favorably adjudicate the application, the applicant is contacted for a final interview. Final interviews are not scheduled until all background checks are completed and a decision to grant enrollment has been made. If the applicant is also applying for enrollment of a vehicle, the vehicle is inspected when the final interview is conducted. At final enrollment, CBP officers conduct a final interview with the applicant, the vehicle is physically inspected, and a final system fee is collected.

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All vehicles must conform to the required program maximum standards, i.e., wheel base length 142 inches and maximum height of 75 inches and pass a seven-point inspection. The vehicle inspection targets the areas most often used for smuggling large quantities of narcotics and other contraband. CBP has determined these target areas through local research and post-seizure analysis along the southern border. When available, CBP officers will use K-9 narcotics detection dogs in the vehicle inspection process. The vehicle may be x-rayed if deemed necessary; however, x-ray vehicle inspection is rarely performed for SENTRI.

Upon successful completion of the final interview and vehicle inspection, CBP officers enroll the applicant in the SENTRI DCL program. Final enrollment includes:

- Providing an orientation packet to the enrollee that includes a copy of SENTRI DCL rules, CBP publications “Know Before You Go” and “Notice to Travelers,” DCL and Enrollment Center hours of operations, and an explanation of actions that will lead to suspension or revocation of SENTRI DCL privileges;
- Having the enrollee sign a form acknowledging SENTRI DCL rules were explained;
- Taking a digital photograph of the enrollee, printing a SENTRI DCL PortPASS card, and issuing it;
- Affixing a radio frequency identification transponder to the windshield of the vehicle; and
- Verifying pre-enrollment information on the I-823 with information contained in GES and updating any changes.

In addition, enrollees are told that any device or identification issued in order to participate in the SENTRI program remains the property of the federal government. When the final enrollment process is completed, the enrollee may begin using SENTRI DCLs to gain entry to the United States.

## **Continued Eligibility of SENTRI Enrollees**

We have concerns about program management practices that are intended to ensure that SENTRI enrollees continue to be eligible for participation in the program. Specifically, problems exist with updating SENTRI system records, documenting violations, administering penalties, establishing criteria for



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conducting random compliance inspections, and documenting the results of compliance inspections.

### **Updating the Global Enrollment System**

A major strength of the SENTRI enrollment process is that CBP conducts an array of law enforcement database and criminal record background checks prior to enrollment. Equally important is CBP's ongoing monitoring of an enrollee's continued eligibility to remain in the SENTRI program after initial enrollment.

CBP must have immediate knowledge of an enrollee's involvement in criminal activity, immigration violations, or other behavior that would make the enrollee ineligible for continued participation in the program. CBP obtains this information by running the entire SENTRI enrollment database from GES every 24 hours in TECS, which compares the names in GES with its current law enforcement, immigration, and terrorist information contained in TECS. TECS returns a report to both Enrollment Centers that identifies matches. When a match occurs, an interdiction notice is entered into GES. The next time the enrollee enters a SENTRI DCL, the interdiction notice is displayed and the inspecting CBP officer may stop the vehicle to conduct an inquiry or refer the enrollee to secondary inspection, if necessary.

While current TECS information is accessible by the CBP officer at the time of inspection, it is not displayed on the GES monitor in the inspection booth. The CBP officer must conduct a separate query in TECS to obtain that information. Entering the data into GES makes the information immediately accessible to the CBP officer in the inspection booth. This information not only serves to prevent ineligible SENTRI travelers from continuing to use the SENTRI program, but it also provides an additional measure of safety for the officers.

The current process to update GES with TECS information is time consuming and labor intensive, as it is an entirely manual process. Once GES data is uploaded into TECS, the resulting reports must be manually reviewed, and new information regarding each affected enrollee has to be manually entered into GES.

In addition, problems exist with the TECS report. When the enrollment database is run against TECS, all records since the enrollee's initial application are returned, not just new information available since the last update. This comparison generates a very lengthy printed report. Because of the report's

length, CBP officers have difficulty distinguishing new information from that which has been previously reported. If the new information is not identified and entered into GES, there is no assurance that the inspecting CBP officer will obtain the information using the manual TECS query process available in the inspection booth. In addition, CBP officials told us that the TECS updates are not always current. In some situations, due to technical problems, TECS may generate a report without having actually run the update. CBP officers reviewing the TECS report have no way of knowing whether the update was actually conducted.

CBP officials said an interim system upgrade is planned for TECS to return only enrollee records since the last system request for information was made. This upgrade is intended to reduce the length of the report and to increase the inspection officer's ability to distinguish relevant information for manual input into GES. CBP officials said the fielding of this upgrade is planned for July 2004.

The Ysleta Enrollment Center in El Paso, Texas is conducting TECS queries only at initial enrollment and enrollment renewal. It is not conducting any ongoing or routine queries to monitor an enrollee's continued eligibility. Draft program guidelines stipulate that the entire enrollment database must be updated through TECS on a 24-hour basis. By not performing these queries daily, the integrity of the SENTRI program and border security is compromised.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 5:** Implement policy, guidance, and procedures for routine and timely system queries to monitor continued eligibility of SENTRI program enrollees.

**Recommendation 6:** Provide the OIG with a plan and schedule for achievement under which GES, or any successor system, will establish real time connectivity with TECS.

### **Conducting Compliance Inspections**

Each SENTRI POE conducted secondary inspections through a combination of random computer and officer-generated referrals. Of the vehicles processed through each SENTRI DCL from January 1, 2003, to December 12, 2003, Stanton Street Bridge in El Paso, Texas performed (b) (2) High ent secondary inspections; Otay Mesa, California performed (b) (2) High ent; and, San Ysidro,

California performed (b)(2)High. Vehicles processed and secondary inspections conducted by land POE in SENTRI DCLs are summarized below.<sup>18</sup>

**Secondary Inspections in SENTRI DCLs**

Port of Entry	Total Vehicles Processed in DCLs	Total Secondary Inspections in DCLs
El Paso, TX	1,251,265	(b)(2)High
Otay Mesa, CA	623,029	
San Ysidro, CA	1,600,401	
<b>Total</b>	<b>3,474,695</b>	

Each SENTRI POE used different criteria to establish the number of computer and manually generated random compliance inspections. For example, CBP field officials told us that at the Stanton Street Bridge land POE, the computer generated compliance inspection rate was tied to the National Homeland Security Advisory System.<sup>19</sup> (b)(2)High  
 (b)(2)High  
 (b)(2)High In contrast, we were told that the frequency of (b)(2)High inspections in Otay Mesa and San Ysidro land POEs runs from (b)(2)High percent. There was no indication that these percentages are tied to any alert system.

While we do not offer an opinion about what the appropriate compliance inspection rate should be, we are concerned that the criteria for establishing the rates was so different at the POEs and was not based on any risk or threat. Despite what we were told at the POEs, CBP headquarters officials were emphatic that only headquarters and not the POEs set compliance inspection rates. Further, while the Stanton Street Bridge land POE used the National Homeland Security Advisory System as a guide, the (b)(2)High and “(b)(2)High compliance inspection rates were selected arbitrarily.

Also, CBP does not document the results of secondary inspections in GES. No records were available in GES to describe the resolution or the outcome of secondary inspections, regardless of the reason the secondary referral was initiated. Accordingly, CBP program officials do not have sufficient performance data to alert them to trends, actions, or violations that may have impact on the program’s effectiveness and security.

<sup>18</sup> GES data for SENTRI DCLs tracks secondary inspections, but does not distinguish between successful and unsuccessful inspections. Data provided by the CBP contractor, CSC, December 17, 2003. These figures cover January 1, 2003 to December 12, 2003.

<sup>19</sup>The Homeland Security Advisory System uses five colors: Red=Severe, Orange=High, Yellow=Elevated, Blue=Guarded, and Green=Low, to alert the public and governmental organizations to the risk of terrorist activities.

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Establishing compliance inspection rates that are not based on risk, threat, or analysis of the results of previous compliance inspections weakens the integrity of the SENTRI program. Setting compliance inspection rates higher than required wastes valuable CBP resources and unnecessarily inconveniences the traveling public. Setting compliance inspection rates too low weakens the enforcement of SENTRI regulations and potentially compromises border security.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 7:** Establish a program to document the results of all secondary inspections, analyze the results, and use the analysis to establish appropriate compliance inspection rates.

**Recommendation 8:** Establish guidance to the POEs to allow for temporary modification of compliance inspection rates based on local threat level concerns.

### **SENTRI Violations and Penalties**

If an enrollee commits a violation, depending on its severity, CBP officers and supervisors may issue a verbal or written warning, a suspension for up to 90 days, or a permanent revocation from the program.

Examples of violations considered minor by CBP that would warrant a written warning are:

- Transporting an unauthorized passenger
- Placing a transponder on an unauthorized vehicle
- Having an expired enrollment (less than 30 days)
- Not possessing a valid PortPASS card
- Traveling in an unauthorized vehicle

If subsequent violations or other minor violations of a similar nature occur, suspension of enrollment is considered. Examples of violations, not considered minor that would warrant a suspension of up to 90 days are:

- Violating any provision indicated on the I-823
- Permitting an unauthorized person to use an authorized vehicle
- Refusing or neglecting to obey any proper order of CBP officers or other port officer
- Using an expired PortPASS

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- A law enforcement agency requests suspension because of an ongoing investigation

If an enrollee receives three suspensions, the enrollee is removed from the program for two years from the date of the last suspension.

Examples of violations that warrant a permanent revocation of an enrollee's participation in SENTRI are:

- Inadmissibility to the United States
- Meets one or more of the denial categories that would have resulted in initial ineligibility
- Documented violation or fine imposed as a result of importation of . controlled or restricted merchandise, including samples, or undeclared monetary instruments

When a violation occurs, the CBP officer takes possession of the PortPASS card and vehicle transponder, explains the violation to the enrollee, and directs the enrollee to the Enrollment Center Supervisor to discuss the violation and penalty.<sup>20</sup> The inspecting CBP officer then prepares a written report of the incident that includes a description of the violation and a recommendation for suspension. The report is given to the Enrollment Center supervisor for review.

Only the Enrollment Center supervisor approves suspensions and permanent revocations. The supervisor may determine that a suspension is not warranted and may issue a verbal or written warning to the enrollee and return the PortPASS card and transponder. If a suspension is approved, a letter is prepared and given to the enrollee, in person or by mail, stipulating the reason for suspension and its duration. The suspension is documented in the enrollee's hard copy file and entered into GES. Enrollees do not have the right to appeal a suspension or revocation decision.

We performed an analysis of GES revocation data for each Enrollment Center.<sup>21</sup> We categorized enrollees as "Other" when the reason for suspension or revocation was not defined or the file contained the entry "suspension – no longer in program." We placed 967 enrollees in the "Other" category.

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<sup>20</sup> If the enrollee is otherwise admissible to the United States or is a United States citizen, the enrollee is allowed to enter the United States.

<sup>21</sup> The data provided to us included enrollees who elected not to renew enrollment in the program. We omitted all enrollees from our analysis where there was a clear indication the enrollee did not renew enrollment.

**San Ysidro and Otay Mesa California Land POEs Revocations<sup>22</sup>**

Violations	Total Violations	Fine	30 Day	60 Day	90 Day	> 90 Days	Permanent Revocation	Total Penalties
Criminal	112	0	0	0	2	0	67	69
SENTRI	167	0	3	2	45	2	42	94
Immigration	547	0	2	1	14	11	180	208
Customs	105	2	1	0	35	0	30	68
Agriculture	68	32	1	1	10	0	19	63
Other	204	0	0	0	13	0	51	64
<b>Total</b>	<b>1203</b>	<b>34</b>	<b>7</b>	<b>4</b>	<b>119</b>	<b>13</b>	<b>389</b>	<b>566</b>

**Stanton Street Bridge Land POE El Paso, Texas Revocations<sup>23</sup>**

Violations	Total Violations	Fine	30 Day	60 Day	90 Day	> 90 Days	Permanent Revocation	Total Penalties
Criminal	23	0	0	0	0	0	23	23
SENTRI	2	0	0	0	0	0	2	2
Immigration	10	0	0	0	0	0	10	10
Customs	0	0	0	0	0	0	0	0
Agriculture	0	0	0	0	0	0	0	0
Other	763	0	0	0	0	0	0	0
<b>Total</b>	<b>798</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>35</b>	<b>35</b>

Even though CBP officials told us there is a “zero tolerance” for enrollees’ violating either SENTRI DCL rules or other US regulations and laws, there was a significant difference between the total number of violations recorded in GES and the total number of penalties imposed. For both Enrollment Centers there were 2,001 total violations recorded in GES, but only 601 penalties imposed. For approximately 70 percent of the reported violations, there was no GES record of penalties imposed. Also, the only penalties that the Ysleta Enrollment Center in El Paso, Texas was recording were permanent revocations. For the violations recorded in GES, we did not conduct a review of all enrollee files to verify whether penalties were administered. We concluded, however, that the Enrollment Centers were not documenting SENTRI program violations and penalties imposed in GES in a uniform and consistent manner.

Furthermore, the 967 violations, or approximately 48 percent, that we placed in the “Other” category were not adequately described in GES. The draft program

<sup>22</sup> The GES revocation data, from January 2001 to December 2003, was provided to us on December 10, 2003, by the Otay Mesa Enrollment Center in California.

<sup>23</sup> The GES revocation data, from September 1999 to December 2003, was provided to us on December 17, 2003, by the Ysleta Enrollment Center in El Paso, Texas.

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guidelines do not address what information should be recorded in the hard copy or the GES electronic file of an enrollee concerning violations, verbal and written warnings, and suspensions.

CBP's failure to provide adequate guidance on what information should be placed in GES for SENTRI program violations and related penalties hamper its ability to monitor the program effectively. CBP program officials are unable to identify systemic problems with program enforcement and potential program weaknesses. In addition, without the ability to monitor program enforcement, there can be no assurance that SENTRI violators are appropriately penalized or removed from the program.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 9:** Establish policies and procedures that require CBP officers to identify and record SENTRI violations and the resulting penalties imposed that will alert CBP officers to such information when accessing GES.

## **SENTRI Program Management and Oversight**

We have several concerns about the SENTRI program that involve program management and oversight at the national level. The concerns begin with the enrollment process and include the lack of uniform thresholds for criminal offenses, financial solvency, and residency, as well as apparent inconsistencies with application approvals and denials. After initial enrollment, problems exist with updating GES, documenting SENTRI violations, administering penalties, establishing criteria for conducting random compliance inspections, and documenting the results of compliance inspections. These concerns may not be significant individually, but taken as a whole, they indicate weak program management that could jeopardize the program's integrity and border security.

CBP field officials said that they have been disappointed recently in the level of CBP headquarters' direction and interest in the SENTRI program. Furthermore, they told us that the program has suffered because of high turnover in the program manager position, a lack of knowledge of program operations, and the low priority given to the program.

Additionally, CBP field officials told us that there was little communication with CBP headquarters. According to field officials, there has been a lack of oversight,

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guidance, and direction provided to SENTRI field managers to collect, track, and analyze meaningful performance data for use in evaluating the program's effectiveness. For example, CBP field officials at both Enrollment Centers told us that their limited contact with CBP headquarters usually concerned the number of applications made, increases in enrollment, backlogs in processing, and DCL waiting times. While these are valuable performance measures, they represent only a portion of the data that should be collected to evaluate the SENTRI program. These measures are focused on the customer service aspects of the program and ignore the even more important law enforcement and border security concerns. In addition, the program currently operates with draft standard operating procedures and guidelines, even though the program has been operational at the Otay Mesa, California land POE since November 1995; at the Stanton Street Bridge land POE in El Paso, Texas since September 1999; and at the land POE in San Ysidro, California since September 2000.

We were impressed by the capabilities of GES to record and report significant program information. We were disappointed, however, with CBP's not making full use of the capabilities of GES. Data quality problems due, in part, to lack of program guidance is also evident. Further, SENTRI program managers do not have access to GES at CBP headquarters and do not request GES reports from the Enrollment Centers.

We identified several examples of GES performance data that was not collected but that could have been used by SENTRI program managers to improve the program. For example, there is no performance data available to evaluate how the number of violations in SENTRI DCLs compares to the number of violations in regular lanes, or to assess why the percentage used for conducting compliance inspections at land POEs in SENTRI DCLs is not uniform. In addition, data is not maintained as to the reasons secondary inspections are conducted in SENTRI DCL, e.g., system compliance check, random check, or CBP officer referral; the resolution or outcome of secondary inspections is not tracked; violations of SENTRI rules and other violations are not consistently recorded in GES at land POEs; and, there is no clear breakdown for reasons why the majority of applicants are denied enrollment or denied enrollment renewal. With program guidance and oversight in the use of GES, GES reports could become a more useful tool for program managers to identify and resolve inefficient and ineffective aspects of the program, as well as to address law enforcement and security vulnerabilities.

Performance data also relates to how a POE manages traffic volume. Because of space limitations at the POEs, SENTRI DCLs are not usually created through



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new construction. Normally, a new DCL is created by the re-designation of a regular inspection lane to a DCL. If CBP does not properly project potential SENTRI traffic volume and does not designate sufficient DCLs, the vehicle traffic in the DCLs could back up, creating waiting times as long as those in the regular inspection lanes. This would defeat the purpose of the SENTRI program and reduce SENTRI usage. Conversely, if the DCLs do not get sufficient use, then resources are inappropriately taken from the regular inspection lanes, creating additional traffic problems in those lanes.

There is also a need for a formal SENTRI training program for CBP officers assigned SENTRI duties. We were told that the training program at the POEs consisted of two to three days of on-the-job training with another CBP officer. New officers do not receive written SENTRI policies or procedures. The current SENTRI standard operating procedures were in draft, and did not always reflect current program operations. Institutional knowledge of the program was not captured in training documents and is lost when experienced officers rotate out of SENTRI program positions.

Enhanced program oversight by CBP is needed. The development of performance data is necessary and prudent to evaluate the program's effectiveness. Furthermore, guidance and standard operating procedures should be finalized and a standardized training program developed to ensure uniform and consistent program implementation at all SENTRI POEs to minimize local variances. In doing so, the contributions made by the program to strengthen and secure our border will be better realized; at the same time, any potential vulnerabilities or weaknesses can be sufficiently addressed.

We recommend that the Commissioner of Customs and Border Protection:

**Recommendation 10:** Develop a program to collect, track, and analyze SENTRI performance data to evaluate SENTRI's effectiveness and efficiency.

**Recommendation 11:** Finalize guidance and standard operating procedures, which should include a standardized training program, to ensure uniform and consistent program implementation at all SENTRI land POEs.

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## Future SENTRI Expansion

After the attacks of September 11, 2001, securing our border is one of the major priorities for DHS senior management, programs, and operations. DHS is addressing possible vulnerabilities through a myriad of initiatives. CBP officials told us that they intend to expand the SENTRI program from three land POEs to an additional four POEs. Before any expansion effort is undertaken, however, CBP should address recommendations made in this report, so current program and operational variances are not duplicated at expansion sites.

CBP officials told us that program expansion is projected to begin in March 2004 and should be complete by late summer of 2004. CBP will fund the expansion with approximately \$60 million from fiscal year 2003 appropriations that were redirected from the US-VISIT program. Expansion of SENTRI is planned for the following land POEs: San Ysidro, CA - two additional vehicle lanes and one pedestrian lane; Calexico, CA - one vehicle lane; Nogales, AZ - one vehicle lane; Ysleta crossing in El Paso, TX - two vehicle lanes; Laredo, TX - one vehicle lane; and Brownsville, TX - one vehicle lane. The expansion will also include the construction of new Enrollment Centers at Brownsville and Laredo, TX and Calexico, CA.

To make the expansion of SENTRI more successful, CBP should develop performance data at existing locations to realize the universe of current enrollees fully and the market that is served by the program. This exercise would ensure prudent oversight of funding resources to maximize human capital and infrastructure development devoted to the expansion. The expansion sites proposed by CBP rank in the top ten land passenger gateways for incoming passenger vehicles from Mexico.<sup>24</sup> But what CBP has not determined is the size of the potential SENTRI enrollee population. Possessing this knowledge would enable SENTRI program managers to budget appropriate resources for the expansion sites.

For example, in calendar year 2002, approximately 20.5 million passenger vehicles used the San Ysidro and Otay Mesa land POEs in regular lanes and SENTRI DCLs. The current enrollment total at both land ports is 48,357. GES recorded 2,223,430 vehicles processed from January 1, 2003, to December 12, 2003, through SENTRI DCLs. Using this data we then calculated that the average

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<sup>24</sup>Department of Transportation, Bureau of Transportation Statistics 2002.

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SENTRI enrollee makes approximately 46 border crossings through DCLs each year. In reality, however, some enrollees use the DCLs infrequently, while others use them daily. The difference in usage patterns has potential significant resource implications. The more that is known about the enrollees' travel patterns, the better CBP's ability to perform meaningful analysis, gain an understanding of the population served by SENTRI, and project future growth.

CBP officials said that at expansion sites, rather than using SENTRI's existing technology, the use of NEXUS program photographic identification or proximity card technology would be tested for use and applicability.<sup>25</sup> It is our understanding that the major difference between the two technologies is that with SENTRI, the vehicle transponder activates a signal that queries GES for information about the vehicle and its authorized occupants, not the PortPASS card. With NEXUS, the proximity card activates a signal that queries GES for information about the enrollee.<sup>26</sup>

There are widely differing opinions regarding the introduction of proximity card technology on the southern border. Some CBP field and US-VISIT Office officials expressed grave concerns about eliminating a key element - the vehicle - from the enrollment process. They contend that without the vehicle enrolled in the program, incidents of smuggling would likely increase. Other CBP field officials, however, did not view eliminating the vehicle from the enrollment process as a security or law enforcement concern. However, CBP headquarters officials said the field officials were misinformed and that there is every intention to continue the use of the vehicle transponder with the proximity card technology.

With both technologies, however, GES remains the integral stand alone system and the entire enrollment database must be submitted to TECS for information to update an enrollee's continued eligibility and low risk. Once queried, CBP officers would still need to review TECS results manually and then place an interdiction in the enrollee's GES electronic file for it to be seen on the DCL monitor by the officers. CBP officials told us that they eventually intend to make system changes that would allow GES information to be linked at all SENTRI land POEs and that a direct query would be made of TECS each time an enrollee uses a DCL for border crossing. With these proposed changes, the SENTRI program operations will be greatly enhanced by providing the enrollee with an

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<sup>25</sup> NEXUS is a CBP northern border program to expedite travel. This program streamlines border inspection for preapproved low-risk travelers by using a joint enrollment process and one card for expedited entry to both Canada and the United States.

<sup>26</sup> As expansion is planned at existing SENTRI sites, proximity card technology will be tested to ensure that transponder transmission do not interfere with proximity card transmission signals during the changeover period.

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added benefit to use multiple land border POEs, and, providing CBP officers with “real time” information concerning the continued eligibility and low risk of enrollees.

While the planned expansion of SENTRI provides additional incentive for implementing our recommendations, the role that SENTRI may play in US-VISIT makes implementation imperative. US-VISIT officials told us that SENTRI would most likely be a cornerstone of the US-VISIT program, irrespective of whether NEXUS, SENTRI, or both technologies are applied. US-VISIT will provide the capability of recording the entry and exit of non-United States citizens into and out of the United States and will provide officials with information about persons who are in the United States in violation of the terms of their admission. The US-VISIT system envisions using information, coupled with biometric identifiers, such as photographs and fingerprints, to create an electronic check-in/check-out system for people who come to the United States to work, study, or visit. Current US-VISIT deployment plans have focused on air POEs. US-VISIT officials have not yet developed plans for deployment of US-VISIT to land POEs, but one official told us that SENTRI would be an integral part of US-VISIT at land POEs. This makes correcting the identified weaknesses in the SENTRI program even more urgent so as not to hamper US-VISIT by these weaknesses.

**Federal Bureau of Investigation** (FBI) is sent fingerprints of SENTRI applicants. The FBI will then make internal query of numerous databases. The National Crime Information Center (NCIC) is an online service provided by the FBI to law enforcement and criminal justice agencies to record or retrieve information on individuals, vehicles, and property involved in or associated with crimes. The system objectives are to identify wanted individuals under investigation or of interest to CBP. The SENTRI program uses this information to verify criminal history or records.

**Western Identification Network/Automated Finger Print System** (WIN/AFIS) is a central database of arrest records and contains fingerprint images and text data from ten print fingerprint cards. Law enforcement personnel can compare fingerprints of apprehended individuals or latent fingerprints against it to determine identity. It allows CBP to maintain and search criminal fingerprint records. The SENTRI program uses this information to verify criminal history or records.

**Central Index System** (CIS) is a centralized text-based system that identifies the location of an alien's A-file. It contains information on lawful permanent residents, naturalized citizens, violators of immigration laws, and others. It includes biographical and status information about the alien, such as name, date of birth, alien number, country of birth, citizenship, various file control data, dates of immigration actions, and identifying numbers. It also contains selected data from other databases, such as NAILS and DACS, and links those databases to CIS. CIS is intended to be a "pointer" system that will lead to the alien's A-file, which should contain complete information on the alien, or to other databases. The SENTRI program uses this information to verify the immigration status of an applicant.

**Deportable Alien Control System** (DACs) is a centralized text database and is used mainly to track aliens through the removal process. It contains information about aliens who have been detained or placed on a docket for deportation or exclusion. DACs includes the status or disposition of individual deportation cases, as well as statistical and summary data of deportation cases by type, status and other characteristics of the case, as well as biographical data about the alien. The SENTRI program uses this information to verify the immigration status of an applicant.

**National Automated Immigration Lookout System** (NAILS) is a central repository for all immigration lookout information and is comprised of

information supplied by automated systems within the Department of State and on-line entry of CBP personnel. The system objectives are to permit CBP to identify and access accurate information quickly on people who are not eligible for entry into the US. The SENTRI program uses this information to verify admissibility of an applicant into the United States.

**Interagency Border Inspection System** (IBIS) is a shared database of lookout and enforcement data contributed from many federal agencies, including the Departments of State and Agriculture. The system objectives are to identify and intercept persons attempting illegal entry into the United States and to facilitate lawful travelers and enhance border enforcement. Immigration lookout information is provided through the National Automated Immigration Lookout (NAILS) data and downloaded to IBIS nightly. It also provides access to the FBI's National Crime Information Center (NCIC) and allows users to interface with all fifty states via the National Law Enforcement Telecommunications Systems (NLETS). The SENTRI program uses this information to determine admissibility into the United States.

**Treasury Enforcement Communications System** (TECS) stores information about people of interest to law enforcement agencies, so that their entry into the United States may be monitored or, if necessary, prevented. TECS contains inspection data on travelers who have entered or attempted entry into the US. The SENTRI program uses this system to verify information provided by the applicant. System queries include: SQ11 – driver's license, SQ13 - vehicle information, SQPQ - license plate record of border crossing, and SQAD - address check.

**National Law Enforcement Telecommunication System** (NLETS) is a computer based message switching system that links together state, local, and federal law enforcement agencies for the purpose of information exchange. The SENTRI program uses this information to verify motor vehicle and driver's license data. System queries include: DQ – driver's license and RQ - vehicle registration.

**Consular Lookout and Support System** (CLASS) is a Department of State name checking system for visa and passport applications. The visa database contains names of aliens for visa name checking, and the passport database contains names of United States citizens for which there is a lookout. The SENTRI program uses this information to verify the status of an applicant.

**April 29, 2004**

MEMORANDUM FOR CLARK KENT ERWIN  
INSPECTOR GENERAL  
DEPARTMENT OF HOMELAND SECURITY

FROM: Seth M. M. Stodder  
Director, Office of Policy and Planning

SUBJECT: Response to the Office of Inspector General Review of the Secure Electronic Network for Travelers Rapid Inspection Program

Thank you for providing us with a copy of your draft report entitled “The Secure Electronic Network for Travelers Rapid Inspection Program (SENTRI)”, and the opportunity to discuss the issues in this report.

Customs and Border Protection (CBP) agrees with the Department of Homeland Security (DHS), Office of Inspector General’s (OIG) overall observations that CBP needs to take steps to enhance the SENTRI program’s overall effectiveness. CBP has taken, and will continue to take, prudent steps to address these factors. Attached are comments specific to the recommendations, as well as technical comments that relate to statements that need to be clarified prior to finalization of this report.

At this time CBP has not identified any information that would warrant protection under the Freedom of Information Act and the applicable exemption.

If you have any questions regarding this response, please have a member of your staff contact Ms. Cecelia Neglia at (202) 927-9369.

Attachment

### **Response to OIG Draft Report**

**The Secure Electronic Network for Travelers Rapid Inspection Program  
(ISP Report Number 18)**

**Response to Recommendations**

**Recommendation 1:** Provide a statement of program eligibility criteria that establishes a minimum and objective threshold for violations, arrests and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI.

**Response:** In the SENTRI Directive, Office of Field Operations (OFO) will address program eligibility criteria that establishes a minimum and objective threshold for violations, arrests and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI.

**Due Date:** January 1, 2005

**Recommendation 2:** Establish procedures for all SENTRI Enrollment Centers that define how CBP officers will resolve hits generated by background checks and how they will document such resolution in the applicant files.

**Response:** In the SENTRI Directive, OFO will establish procedures for all SENTRI Enrollment Centers that define how CBP officers are to resolve hits generated by background checks and how they will document such resolution in the applicant files.

**Due Date:** January 1, 2005

**Recommendation 3:** Develop a uniform minimum economic threshold to establish employment or financial solvency and develop a uniform timeframe for documents requested to establish employment, financial solvency and residency.

**Response:** In the SENTRI Directive, OFO will define a uniform minimum economic threshold to establish employment or financial solvency and develop a uniform timeframe for documents requested to establish employment, financial solvency and residency.

OFO agrees to establish proof of residency for SENTRI, but does not wish to establish a financial minimum for enrollment. Financial concerns should be addressed on a case-by--case basis.

**Due Date:** January 1, 2005



**Recommendation 4:** Establish a policy to require the separation of duties to ensure that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.

**Response:** In the SENTRI Directive OFO will establish a policy to require the separation of duties to ensure whenever possible that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.

OFO uses CBP officers, who are already assigned to the port of entry to work the enrollment centers. Therefore, a limited number of officers can be pulled from port operations to work the centers. Whenever possible, OFO can direct the centers to use different officers, but due to the enormous volume of applicants, it may not always be possible to use two different officers.

Though it is desirable to have two officers' independent assessment of each applicant's eligibility, this requirement places a higher standard on enrollment in SENTRI than exists for granting US visas, border crossing cards, or US citizenship (and other benefits).

**Due Date:** January 1, 2005

**Recommendation 5:** Implement policy, guidance, and procedures for routine and timely system queries to monitor continued eligibility of SENTRI program enrollees.

**Response:** CBP is in the process of developing a method to query each SENTRI participant at the time of border crossing. This will be a full person subject query, identical to queries done during secondary examination, and will look at all TECS records (CBP violators/terrorist watchlists/etc.) and will query the National Crime Information Center (NCIC) for warrants. This will be an automated query, which will respond to the inspector at the primary booth.

**Due Date:** January 1, 2005

**Recommendation 6:** Provide the OIG with a plan and schedule for achievement under which Global Enrollment System (GES), or any successor system, will establish real time connectivity with TECS.

**Response:** It must be understood that "integrated" means that GES and TECS will be closely linked, but that there are no plans to make GES a part of TECS. With that in mind, GES 4.0, a planned upgrade to the current GSA used for SENTRI, will be implemented in September 2004 and will provide GES users with automatic query capability in TECS and in other systems such as NCIC. This query capability will enable a full series of queries to be performed automatically on enrollment and at any set intervals during the applicant's membership. GES 4.0 will incorporate the primary subject query capability. GES

4.0 is an independent system, which will migrate from a regional series of databases to a true global system in September 2004.

**Due Date:** January 1, 2005

**Recommendation 7:** Establish a program to document the results of all secondary inspections, analyze the results, and use the analysis to establish appropriate compliance inspection rates.

**Response:** Secondary results are recorded in TECS under IO04. However, a modification to IO04 will have to be made to designate exams specifically for NEXUS or SENTRI. A query function to bring up the designated NEXUS or SENTRI exams will also have to be developed.

OIT will have to commit personnel to develop the IO04 enhancements and OFO will have to fund the design and production of the enhancement. Currently, OFO has no identified funding in FY 2004 or 2005 to complete these enhancements.

However, instructions for recording results of secondary referrals, which is standard operating procedure, will be repeated in the updated SENTRI directive to the field offices. When the SENTRI referrals can be separated from overall port referrals, the analysis of results will have a better basis. The directive will include guidance for modifying compliance referral rates based on local spikes in non-compliance or national threat levels.

**Due Date:** Updated Directive: January 1, 2005; new program to separate SENTRI referrals from others; December 31, 2006 (This is an estimated date. An actual date cannot be given until funding is appropriated for this enhancement.)

**Recommendation 8:** Establish guidance to the POEs to allow for temporary modification of compliance inspection rates based on local threat level concerns.

**Response:** The SENTRI Directive will provide guidance for modifying compliance referrals and be based on local or national threat level concerns.

**Due Date:** January 1, 2005

**Recommendation 9:** Establish policies and procedures that require CBP officers to identify and record SENTRI violations and the resulting penalties imposed that will alert CBP officers to such information when accessing GES.

**Response:** The problem here is to be able to compare violations in SENTRI with violations in other, non-SENTRI lanes. This will give a clear picture of whether the SENTRI population is truly low-risk.

The solution to this will come at the end of FY06, assuming that GES 5.0 is funded. All violations at a port of entry, whether SENTRI or otherwise, are recorded in TECS. This is a CBP requirement. One of the plans for GES 5.0 is to establish a very close connectivity to Treasury Enforcement Communication System (TECS). One aspect of this connectivity is planned as the ability to track SENTRI violations in TECS (by identifying them in the various types of records kept in TECS), and to have GES 5.0 capable of ordering reports comparing the various types of violations (number/type/severity) occurring in SENTRI and the non-SENTRI lanes at the port.

This ability will be available in GES 5.0. In the meantime, when a SENTRI vehicle is referred to secondary, the applicants are queried by name in TECS. Any previous violation will show up in this query. The SENTRI Directive will instruct officers to follow this procedure for SENTRI, which is standard operating procedure, (until GES is available for the purpose.)

**Due Date:** January 1, 2005 for Directive instructions on TECS; September 30, 2007 for new capabilities for GES.

**Recommendation 10:** Develop a program to collect, track, and analyze SENTRI performance data to evaluate SENTRI's effectiveness and efficiency.

**Response:** The measurements by which to evaluate SENTRI performance will be reexamined and selected to evaluate effectiveness as well as efficiency. The selected measurements will be collected twice yearly and the program as a whole, as well as individual sites will be evaluated.

**Due Date:** January 1, 2005

**Recommendation 11:** Finalize guidance and standard operating procedures, which should include a standardized training program, to ensure uniform and consistent program implementation at all SENTRI land POEs.

**Response:** OFO will work with OIT to develop a National training program. The training program will be in the form of a SENTRI User Guide available to all CBP officers via the CBPnet. OIT will have to commit personnel to develop the SENTRI User Guide and OFO will have to fund the design and production of the user guide. Currently, OFO has no identified funding in FY 2004 or 2005 for the design and production of the user guide.

**Due Date:** December 31, 2006

**Technical Comments**

Page 5, 2<sup>nd</sup> paragraph: “that system administration functions delete records.” It should be noted that enrollment records cannot be deleted and that only user access can be deleted.

Page 5, 3<sup>rd</sup> paragraph: “that GES generates a random compliance check. The compliance check is generated by the validation system, not GES. GES merely stores a count of record crossings so that if a traveler is not inspected for 50 crossings, they will then be referred to secondary.

Page 5, 3<sup>rd</sup> paragraph: “that GES generates a random compliance check.” The compliance check is generated by the validation system, not GES. GES merely stores a count of record crossings so that if a traveler is not inspected for 50 crossings, they will then be referred to secondary.

Page 6, 1<sup>st</sup> paragraph: “that license plate readers perform queries on vehicle and occupants.” Occupant query is not performed, only vehicle.

Page 6, 2<sup>nd</sup> paragraph: Is incorrect. The original intent of the PortPASS card was that it be scanned so that the driver would be required to stop for a long enough period that the inspector could assess all occupants. This card swipe was later integrated into SENTRI as the trigger for opening the gate. Also, the PortPASS card is not used as an identity document at all. The card does allow tracking of travelers and vehicles along the northern border, a capability that will be implemented along the southern border this summer.

We evaluated CBP's written comments and have made changes to the draft report where deemed appropriate. Below is a summary of CBP's written response to the report's recommendations and our analysis of their response.

### **Recommendations**

**1. Provide a statement of program eligibility criteria that establishes a minimum and objective threshold for violations, arrests, and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI.**

CBP's plan to modify the SENTRI Directive to include program eligibility criteria that establishes a minimum and objective threshold for violations, arrests, and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI is responsive to this recommendation. However, we are concerned that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 1 - Resolved - Open.**

**2. Establish procedures for all SENTRI Enrollment Centers that define how CBP officers resolve hits generated by background checks and how they document such resolution in the applicant files.**

CBP's plan to establish procedures, in the SENTRI Directive, for all SENTRI Enrollment Centers that define how CBP officers are to resolve hits generated by background checks and how they will document such resolution in the applicant files is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 2 - Resolved - Open.**

**3. Develop a uniform minimum economic threshold to establish employment or financial solvency, and develop a uniform timeframe for documents requested to establish both employment or financial solvency and residency.**

CBP plans to define a uniform minimum economic threshold, in the SENTRI Directive, to establish employment or financial solvency and develop a uniform timeframe for documents requested to establish employment, financial solvency, and residency. CBP agrees to establish proof of residency for SENTRI, but does not wish to establish a financial minimum for enrollment because they believe financial concerns should be addressed on a case-by-case basis. CBP's plan is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 3 - Resolved - Open.**

**4. Establish a policy to require the separation of duties to ensure that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.**

CBP plans to establish, in the SENTRI Directive, a policy to require the separation of duties to ensure, whenever possible, that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.

CBP commented that officers assigned to POEs also work the SENTRI Enrollment Centers. Because of this dual role there are a limited number of officers that can be pulled from port operations to work the centers. CBP can direct the Enrollment Centers to use different officers, but due to the enormous volume of applicants, it may not always be possible to use two different officers. CBP further commented that it is desirable to have two officers' independent assessment of each applicant's eligibility, but this requirement places a higher standard on enrollment in SENTRI than exists for granting U.S. visas, border crossing cards, or U.S. citizenship.

CBP's plan is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. CBP's assertion that our recommendation *places a higher standard on enrollment in SENTRI than exists for granting US visas, border crossing cards, or US citizenship (and other benefits)*, is not entirely correct. The processes for granting these benefits have other built in management control measures to

avoid or identify procedural errors and fraud. For example, the granting of U.S. citizenship requires supervisory approval in certain cases, e.g., any applicant with potentially disqualifying criminal histories, before a final decision is rendered. In addition, according to the January 2003 Citizenship and Immigration Services' *Adjudicator's Field Manual*:

“...an integral part of any quality control program is supervisory review. All Records and Adjudication Supervisors are required to review and be familiar with the work performed by subordinates, and to work on improving the quality of the work produced.”

Further, all citizenship applications are subject to a re-verification process to ensure that all steps in the processing of the citizenship application have been followed. Finally, the quality assurance (QA) staff at each field office performs QA inspections of citizenship applications to ensure proper procedures were followed.

With regard to granting U.S. visas by Department of State consular officers, three or more persons are usually involved in the application approval process. Supervisory consular officers review the “visa refusal rate” of each consular officer on a daily basis. This review will quickly identify a consular officer that appears to be granting visas too liberally. In addition, supervisory consular officers regularly survey approved visa applications to ensure compliance with procedures and law.

A CBP process that requires supervisory review for certain specified SENTRI enrollment applications before a decision was made and a quality assurance review of all approved SENTRI enrollment applications would be responsive to the intent of our recommendation. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 4 - Resolved - Open.**

**5. Implement policy, guidance, and procedures for routine and timely system queries to monitor continued eligibility of SENTRI program enrollees.**

CBP is in the process of developing a method to query each SENTRI participant at the time of border crossing. This will be a full person subject query, identical to queries done during secondary examination, and will look at all TECS records (CBP violators, terrorist watchlists, etc.) and will query NCIC for warrants. The

query is also intended to be automated and responsive to the CBP officer at the primary booth. CBP plans to implement this function by January 1, 2005. CBP's plan is responsive to this recommendation. Please provide us with documentation that the full person subject query has been implemented by January 1, 2005.

**Recommendation 5 - Resolved - Open.**

**6. Provide the OIG with the plan and schedule for achievement under which GES, or any successor system, will establish real time connectivity with TECS.**

CBP commented that "integrated" means GES and TECS will be closely linked, but there are no plans to make GES a part of TECS. During September 2004, CBP plans an upgrade to the current GES version used for SENTRI. This upgraded version, GES 4.0, will provide GES users with automatic query capability in TECS and in other systems such as NCIC. CBP intends the capability will enable a full series of queries to be performed automatically on enrollment, at any set interval during the applicant's membership, and will incorporate the primary subject query capability. CBP plans to migrate GES 4.0 from an independent system of regional databases to a true global system.

CBP's plan is responsive to this recommendation. Please provide us with documentation that establishes the upgraded functionality of GES and its migration from an independent system to a true global system by October 1, 2004.

**Recommendation 6 - Resolved - Open.**

**7. Establish a program to document the results of all secondary inspections, analyze the results, and use the analysis to establish appropriate compliance inspection rates.**

CBP responded that secondary results are recorded in TECS, but a modification would be needed to designate these secondary exams specifically for NEXUS or SENTRI. CBP would need to develop, design, and produce the enhancements, but no funding has been identified to complete these tasks. CBP intends to make these modifications so that SENTRI referrals can be separated from overall port referrals to secondary and they will have a better basis for an analysis of results by December 31, 2006. By January 1, 2005, CBP plans to repeat the instructions in the SENTRI Directive for recording results of secondary referrals. The directive



will include guidance for modifying compliance referral rates based on local spikes in non-compliance or national threat levels.

CBP's plan is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. From CBP's response, it is not clear when the directive will include guidance for modifying compliance referral rates based on local spikes in non-compliance or national threat levels. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004, and clarify when guidance for modifying compliance referral rates will be included in the directive.

**Recommendation 7 - Resolved - Open.**

**8. Establish guidance to the POEs to allow for temporary modification of compliance inspection rates based on local threat level concerns.**

CBP's plan to provide guidance for modifying compliance referrals that are based on local or national threat level concerns is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 8 - Resolved - Open.**

**9. Establish policies and procedures that require CBP officers to identify and record SENTRI violations and the resulting penalties imposed that will alert CBP officers to such information when accessing GES.**

CBP commented that recording all POE violations in TECS is a requirement, whether SENTRI or otherwise, but there is a problem with comparing SENTRI violations with violations in non-SENTRI lanes. CBP plans, by September 30, 2007, to establish a very close connectivity with TECS and the GES 5.0 version if funding is provided. With this version, CBP would track SENTRI violations in TECS and be capable of ordering reports comparing the number, type, and severity of violations occurring in SENTRI lanes and non-SENTRI lanes. Having this ability would provide a clearer picture of whether the SENTRI population is truly low-risk.

Until GES is available for this purpose, when a SENTRI vehicle is referred to secondary, CBP officers are querying the names of the applicants in TECS and any previous violation will show up in this query. CBP plans to update the SENTRI Directive, by January 2005, instructing officers to follow this standard operating procedure for SENTRI.

CBP's plan is responsive to this recommendation. We are concerned, however, that CBP does not intend to modify the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 9 - Resolved - Open.**

**10. Develop a program to collect, track, and analyze SENTRI performance data to evaluate SENTRI's effectiveness and efficiency.**

By January 1, 2005, CBP plans to reexamine the measurements used to evaluate SENTRI performance. The selected measurements will be collected twice a year to evaluate effectiveness and efficiency at individual sites and for the program as a whole. CBP's plan is responsive to this recommendation. Please provide us with these measurements by January 1, 2005.

**Recommendation 10 - Resolved - Open.**

**11. Finalize guidance and standard operating procedures, which should include a standardized training program, to ensure uniform and consistent program implementation at all SENTRI land POEs.**

CBP plans to finalize the SENTRI Directive by January 2005 and will develop a national training program in the form of a SENTRI User Guide available to all CBP officers via the CBPnet. CBP stated that it does not have funding to develop or publish the SENTRI User Guide in its FY 2004 budget or in its FY 2005 budget request. We view the capability to develop guidance, standard operating procedures, and training curriculum as explicit functions and the responsibility for management of any program. We are unable to understand why CBP maintains that it will require a special funding appropriation to develop the SENTRI User Guide.

CBP's plan is responsive to this recommendation. We are concerned, however, that CBP does not intend to update and complete the SENTRI Directive until January 1, 2005. We believe the directive should be updated and distributed sooner. Please provide us with a copy of the revised SENTRI Directive by August 1, 2004.

**Recommendation 11 - Resolved - Open.**

## Recommendations

1. Provide a statement of program eligibility criteria that establishes a minimum and objective threshold for violations, arrests, and convictions to evaluate applicants seeking enrollment or an enrollment extension in SENTRI.
2. Establish procedures for all SENTRI Enrollment Centers that define how CBP officers resolve hits generated by background checks and how they document such resolution in the applicant files.
3. Develop a uniform minimum economic threshold to establish employment or financial solvency, and develop a uniform timeframe for documents requested to establish both employment or financial solvency and residency.
4. Establish a policy to require the separation of duties to ensure that the CBP officer conducting an initial interview and performing background checks and application adjudication is not the same officer approving the application for final enrollment.
5. Implement policy, guidance, and procedures for routine and timely system queries to monitor continued eligibility of SENTRI program enrollees.
6. Provide the OIG with the plan and schedule for achievement under which GES, or any successor system, will establish real time connectivity with TECS.
7. Establish a program to document the results of all secondary inspections, analyze the results, and use the analysis to establish appropriate compliance inspection rates.
8. Establish guidance to the POEs to allow for temporary modification of compliance inspection rates based on local threat level concerns.
9. Establish policies and procedures that require CBP officers to identify and record SENTRI violations and the resulting penalties imposed that will alert CBP officers to such information when accessing GES.
10. Develop a program to collect, track, and analyze SENTRI performance data to evaluate SENTRI's effectiveness and efficiency.
11. Finalize guidance and standard operating procedures, which should include a standardized training program, to ensure uniform and consistent program implementation at all SENTRI land POEs.

David M. Hiles, Chief Inspector, Department of Homeland Security, Office of Inspections, Evaluations, and Special Reviews

Marcia Moxey Hodges, Senior Inspector, Department of Homeland Security, Office of Inspections, Evaluations, and Special Reviews

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