

ICE Air Transportation of Detainees Could Be More Effective





HIGHLIGHTS

ICE Air Transportation of Detainees Could Be More Effective

April 9, 2015

Why We Did This

U.S. Immigration and Customs Enforcement Air Operations (ICE Air) is responsible for moving and removing detainees in ICE custody by providing air transportation services to Enforcement and Removal Operations' (ERO) 24 field offices. We reviewed this program to determine whether ICE Air was ensuring the most effective use of its resources.

What We Recommend

ICE ERO should develop formal policies and procedures for its air transportation program. It should also ensure adequate staffing, complete and reliable program data, and perform an analysis of operations to identify factors affecting efficiency.

For Further Information:

Contact our Office of Public Affairs at (202) 254-4100, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

Although ICE Air met its mission by transporting 930,435 detainees over a 3-1/2-year period, it could have used its resources more effectively. In fact, ICE Air may have missed opportunities to improve the program's overall effectiveness even though it has identified some ways to reduce costs associated with detainee transportation. Furthermore, ICE Air does not capture complete and accurate data essential to support operational decisions. This occurred because ERO did not provide the planning, management, and reporting tools needed to operate effectively, and it does not have a mechanism in place to obtain feedback on how well its processes are performing. ERO management has not developed a data management plan, assessed staffing and training needs, or implemented formal policies and procedures. It also has not conducted a comprehensive analysis of current operations for making informed business decisions that will safeguard the program's resources.

As a result, ICE Air operated charter flights with empty seats and could have realized cost savings of up to \$41.1 million upon determining optimum flight capacity. This estimate is based on the average of charter costs incurred during the scope period for the missions analyzed. Although the estimated potential cost savings will not be claimed as funds put to better use, it is an indicator of ICE Air's potential for future cost savings.

ICE Response

ICE concurred with all four recommendations and has begun taking actions for implementation.



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Abbreviations

ARTS	Alien Repatriation Tracking System
DHS	Department of Homeland Security
ERO	Enforcement and Removal Operations
FY	fiscal year
ICE	U.S. Immigration and Customs Enforcement
OIG	Office of Inspector General
U.S.	United States



Background

The United States (U.S.) Immigration and Customs Enforcement (ICE) is the principal investigative arm of the Department of Homeland Security (DHS). Its mission is to promote homeland security and public safety through the criminal and civil enforcement of Federal laws governing border control, customs, trade, and immigration.

The Enforcement and Removal Operations (ERO) is one of two principal operating components within ICE. ERO enforces the Nation's civil immigration laws to promote public safety, border security, and the integrity of the immigration system. ERO does this by making the removal of criminal detainees and those who pose a threat to our communities its highest priority.

Within ERO, the Repatriation Division is responsible for planning and coordinating the transportation of detainees, and developing and implementing strategies to support the return of all removable detainees to their country of origin. The Repatriation Division consists of ICE Air Operations and the Repatriation Management Division. For this review, we focused on ICE Air Operations, hereafter referred to as ICE Air, as it relates to charter flights.

ICE Air's operational headquarters is located in Mesa, AZ, with some program support staff located in the Washington, DC, area. ICE Air's mission is to move and remove detainees in ICE custody by providing air transportation services to ERO's 24 field offices. ICE Air transports detainees within the United States or returns them to their countries of origin.

ICE Air uses commercial or charter flights to move detainees. Factors such as detainees' country of citizenship, criminal status, and family status will influence whether they travel commercially or by charter aircraft. The Commercial Operations Section coordinates and supports removal of detainees by field offices using commercial airlines. ICE Air transports the majority of detainees by charter aircraft within the United States and to Central America, South America, and the Caribbean. ICE Air has four contracts for routine charter flights; and these contracts provide eight aircraft, each capable of carrying a maximum of 135 detainees. It also contracts aircraft for less



Figure 1: Detainees boarding charter flight.
Source: ICE Enforcement and Removal Operations.



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frequent long-range charter flights to locations such as Europe, Africa, and Asia. ICE Air also arranges special charters to accommodate detainees with serious medical conditions, high-profile removals, or detainees who fail to comply with the removal process.

ICE Air pays, on average, \$8,419 per flight hour for charter flights regardless of the number of passengers on the plane. The charter vendors provide the aircraft, the pilot, flight crew, security personnel, flight nurse, and maintenance services. The flight hour rate also includes operating expenses such as insurance, fuel, landing fees, passenger taxes, and all other miscellaneous fees and taxes associated with each flight.



Figure 2: Aircraft staged for scheduled flights to transport detainees.

Source: DHS Office of Inspector General (OIG).

The ICE Air Division's budget is contained in the Transportation and Removal Program Project Activity. This program project activity also encompasses the Removal Management Division and ground transportation. The Transportation and Removal Program operated with an average annual budget of \$272 million during the period of our review, October 1, 2010, through March 31, 2014. According to ICE Air, it spent approximately \$598 million for ICE Air Operations during that timeframe. Of that, approximately \$464 million was for charter flights (see details in appendix D).

Results of Audit

ICE Air Operations is responsible for moving or removing detainees in ICE custody by providing air transportation services to ERO field offices. Although ICE Air met its mission by transporting 930,435 detainees over a 3-1/2-year period, it may have been able to use its resources more effectively. ICE Air does not capture complete and accurate data essential to support operational decisions and ensure program effectiveness. For example, mission routes lack details for individual stops, ICE Air does not capture and analyze the reasons detainees miss flights, and optimum seat capacity has not been determined. ERO management does not have a mechanism in place to obtain feedback on how well its processes are performing. As a result, ERO management may have missed opportunities to improve the program's overall effectiveness.



This occurred because ERO did not provide the planning, management, and reporting tools the ICE Air program needs to operate effectively. ERO management has not developed a data management plan, assessed staffing and training needs, or implemented formal policies and procedures. It also has not conducted a comprehensive analysis of current operations for making informed business decisions that will safeguard the program's resources.

As a result, ICE Air operated charter flights with empty seats and could have realized cost savings of up to \$41.1 million upon determining optimum flight capacity. This estimate is based on the average of charter costs incurred during the scope period for the missions analyzed. We are not claiming this amount as funds put to better use.

Operations Could Be Improved

Data May Not Be Adequate for Analysis and Decision Making

The ICE Air charter flight data captured is incomplete and inaccurate, and may not be sufficient for analysis and decision making. According to ICE Air records, it transported 930,435 detainees over a 3-1/2-year period. Of this amount, the program removed 711,945 detainees to their country of origin. It transferred the remaining 218,490 detainees among ICE field offices for various reasons, including lack of bed space, immigration proceedings, medical needs, security concerns, and other administrative reasons.

ICE Air records data pertaining to charter flights and detainees in the Alien Repatriation Tracking System (ARTS). A contractor who managed the program's daily activities created the ARTS database to provide a historical record of charter flights, monthly statistical reports, and data responses to ICE required under the contract. ARTS captures information such as the dates, routes, detainees, delays or cancelations, and costs associated with each chartered flight mission. A mission begins when the aircraft departs from its initial location and ends when the aircraft reaches its final destination.¹ Depending on the need, a mission can contain one or more stops to destinations within the United States, internationally, or a combination.

An analysis of 7,445 missions and associated detainees identified errors and missing information in various fields. For example:

¹ The definition for the term "mission" is derived from the definition used in the former Office of Detention and Removal Operations' *Policy and Procedure Manual* (June 2008).



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- There were 23,597 detainees listed as being “picked up” or “dropped off” at locations not on the charter flight route. Specifically, there were 54 detainees recorded as removed to Nicaragua for one mission that included stops only in Louisiana, Texas, and Guatemala.
- Information such as gender, criminal status, or known gang affiliation was incomplete or in error;
 - The data field “Sex,” used to record gender, is not restricted to male or female, and contains numerous entries, such as the numbers 0, 30, and the word “none.”
 - The data field “Criminality” was not restricted to specific entry choices and contains non-logical entries such as “#Ref!”. The field is blank for 20,798 detainees.
 - The data field “Gang Member” contains non-logical numerical entries, such as “2” or “3770701,” for at least 3,000 detainees. The field is blank for 155,966 detainees.
- The “Status” field is not restricted to specific entry choices. It contains 894 different entries and is blank for 31,209 detainees. This field provides information regarding the purpose for a detainee’s transport, such as bond hearing, consular interview, and medical transfer.
- The data fields in ARTS for the alien number and the fingerprint identification number are also not restricted to defined entries and contain errors;
 - The alien file number is a unique seven-, eight- or nine-digit number. However, the field entries range from 1 to 32 characters in length. Alien file numbers were not recorded for 2,575 transported detainees.
 - ICE takes fingerprints for all detainees, yet ARTS did not contain an identification number for fingerprints belonging to 190,243 transported detainees.

ERO management did not develop a data management plan that could help ensure that employees accurately record all mission data in a standardized format. The lack of reliable data limits the ability of management to make informed decisions regarding how many planes it needs to transport the current level of detainees, whether it should revise the frequency of its flights, and how to improve operations overall. Government and private sector best



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practices describe a data management plan as a key element in ensuring accurate and reliable information. According to *Department of Defense Guidelines on Data Quality Management*, a data management plan should contain the processes for:

- defining data quality requirements and establishing data quality metrics;
- measuring data quality conformance;
- verifying, validating, and assessing the causes for poor quality data; and
- identifying and implementing data quality improvements.

Program Staffing, Training, and Guidance Needed

ICE Air's charter operations do not have sufficient trained personnel, and current employees lack the proper guidance to ensure successful daily operations. In May 2014, ICE Air transitioned program management from contract to government personnel without adequate planning. These processes included scheduling flights, obtaining country clearances, manifesting detainees,² tracking charter contract costs, and reviewing invoices. ICE Air replaced the contractors with full-time employees. ICE Air staff said the program office did not adequately assess staffing and training needs to ensure continuity and effective daily operations. During the transition, ERO designated one person to identify the positions held by contractors and to determine how many Federal employees it needed to perform the same tasks. This individual determined that ICE Air needed 19 employees to replace the 37 contractors who had previously provided mission support functions; however, only 13 Federal employees were present when the contractor departed.

ERO has not established comprehensive policies and procedures as guidance for the ICE Air program. Staff responsible for arranging the charter flights explained the informal processes used to schedule, manifest, and oversee the charter flight operations. The schedulers do not have formal policies and procedures on how to prioritize charter flights or detainees. Management is responsible for establishing and maintaining policies and procedures sufficient to ensure that they efficiently operate Federal programs and use Federal resources to achieve desired objectives.

The flights operate out of four main U.S. cities: Mesa, AZ; San Antonio, TX; Alexandria, LA; and Miami, FL. Charter flights can go to international locations

² Manifesting detainees is listing all the detainees who will board a flight. The Federal Aviation Agency requires all flights to maintain a complete manifest prior to each flight.



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and any of the 24 field offices. Figure 3 illustrates examples of different domestic missions used by ICE Air.

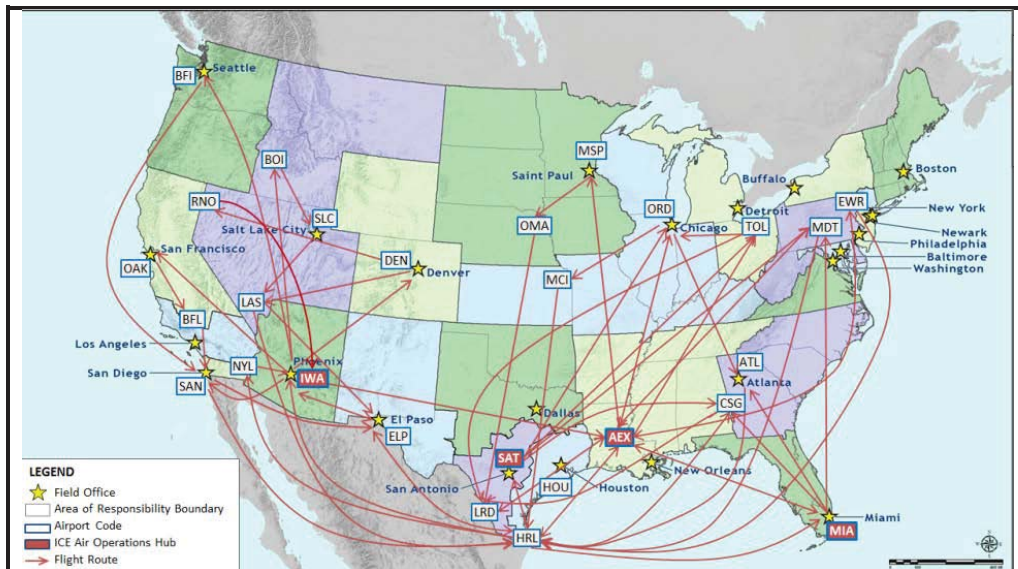


Figure 3: ICE Air Weekly Domestic Routes

Source: ICE Air Operations.

AIRPORT LEGEND

AEX Alexandria, LA	MCI	Kansas City, MO
ATL Atlanta, GA	MDT	Harrisburg, PA
BFI Seattle, WA	MIA Miami, FL	
BFL Bakersfield, CA	MSP	Minneapolis, MN
BOI Boise, ID	NYL	Yuma, AZ
CSG Columbus, GA	OAK	Oakland, CA
DEN Denver, CO	OMA	Omaha, NE
ELP El Paso, TX	ORD	Chicago, IL
EWR Newark, NJ	RNO	Reno, NV
HOU Houston, TX	SAN	San Diego, CA
HRL Harlingen, TX	SAT San Antonio, TX	
IWA Mesa, AZ	SLC	Salt Lake City, UT
LAS Las Vegas, NV	TOL	Toledo, OH
LRD Laredo, TX		

The schedulers worked from a few existing regular routes and added or removed stops to arrange more than 600 different routes to transport detainees to their final destination. To arrange the routes, the schedulers make subjective decisions and modifications based on conversations with field office personnel. The schedulers also coordinate with field offices regarding the number of detainees ready for removal and the number of seats available on a particular flight. ICE Air staff said they could benefit from more guidance, such as a formula or criteria based on analysis of historical data when prioritizing routes and detainees. Figure 4 illustrates examples of different international missions used by ICE Air to remove detainees.



Source: ICE Air Operations.

Based on conversations with management, we determined ICE Air provided newly hired staff with some initial training. However, several employees said they did not receive adequate training to perform assigned tasks effectively. For example:

- Schedulers received a week of on-the-job training. However, an ICE Air management official said the training was insufficient and did not address the complexities of scheduling.
- An employee hired for mission support functions generated reports and provided statistical data for public inquiries. The employee had no prior experience as a data analyst or information technology specialist who could generate reports, alter entry fields, or create new databases as needed. Although ICE Air provided some initial training, the employee said it was inadequate to enable the employee to perform the duties effectively.



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- Four additional employees in various positions also said they had not received adequate training to perform their duties effectively.

Missed Opportunities to Improve Efficiency

ICE Air spent approximately \$116 million for flights from October 2010 through March 2014 that did not fill every allowable seat and flew at less than 80 percent of the aircraft's capacity. Although ERO conducted some studies to reduce costs, ERO management does not have a mechanism in place to obtain feedback on how well its processes are performing. As a result, ERO management may have missed opportunities to identify information that can improve the program's overall effectiveness. This includes flight capacity levels and detention costs; reasons detainees are removed from the manifest; reasons for redundant transfers; and time and cost for each mission stop.

Many factors affect ICE Air's ability to provide efficient air transportation services. For example:

- ICE Air must respond to special requests by the DHS Secretary and other mission needs such as the recent surge of unaccompanied children.
- ICE Air must comply with various restrictions imposed by different countries when transporting detainees for removal. Restrictions include the number, timing, and frequency of flights a country will accept.
- ICE Air does not control the number of detainees each country will accept. For instance, Guatemala and Honduras permit 135 detainees on each removal flight; yet, El Salvador will only accept 120 detainees on each flight.
- Some countries accept juveniles on charter flights; in contrast, other countries do not.
- ICE Air also depends on ERO field offices to properly manifest, verify medical screening, and prepare detainees for transport.

ERO conducted several studies between February 2012 and December 2013 to identify areas for potential cost savings and efficiencies. As a result, ICE Air reduced the frequency of one of its domestic transfer routes. ICE Air has also begun to address its reporting needs to respond better to questions about the air transportation related to the surge of illegal immigrants in the Rio Grande Valley in 2014. However, in spite of these efforts, ICE Air missed opportunities to improve efficiencies with its air transportation and to address the quality of its mission data.



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An analysis of the number of detainees transported for 5,699 of the 7,445 missions we reviewed revealed that ICE Air was not operating at full capacity for both its domestic and international missions. ICE Air does not know its optimum capacity levels for each type of mission, such as its domestic transfers, direct routes to international countries, and non-direct routes to both domestic and international destinations. Therefore, the program may have been able to transport the same number of detainees with fewer missions at a lower charter air cost. Of the 5,699 missions analyzed, approximately 2,121 missions (or 37 percent) operated under 80 percent capacity, but we do not know whether this performance level is good or bad. ICE Air needs to ensure the data is complete and accurate for analysis to determine its optimum capacity levels and make sound business decisions.

Table 1 provides a summary of the results of our review. Although tests of the reliability of the data revealed errors in some fields, we reconciled the number of missions, the costs reported with the financial records, and ICE’s reported statistics (see appendix E for detailed results).

Percent of Allowable Seats Used	Missions	Detainees Transported	Mission Cost
less than 40%	299	9,759	\$ 11,983,026
40% – 60%	754	52,226	\$ 41,085,000
61% – 79%	1,068	100,982	\$ 62,496,952
80% or more	3,578	505,175	\$ 211,841,666
Total	5,699	668,142	\$ 327,406,644

ICE Air spent approximately \$116 million on flights less than 80% capacity

Source: OIG analysis of ICE Air mission data recorded in ARTS.

Flight Capacity

ICE Air needs to determine its optimum seat capacity level for each mission type and the reasons why flights operate at less than full capacity. Even when ICE was limited to 120 seats because of country restrictions, ICE Air only used 90 seats at times; leaving the remaining seats empty, which may not be efficient.

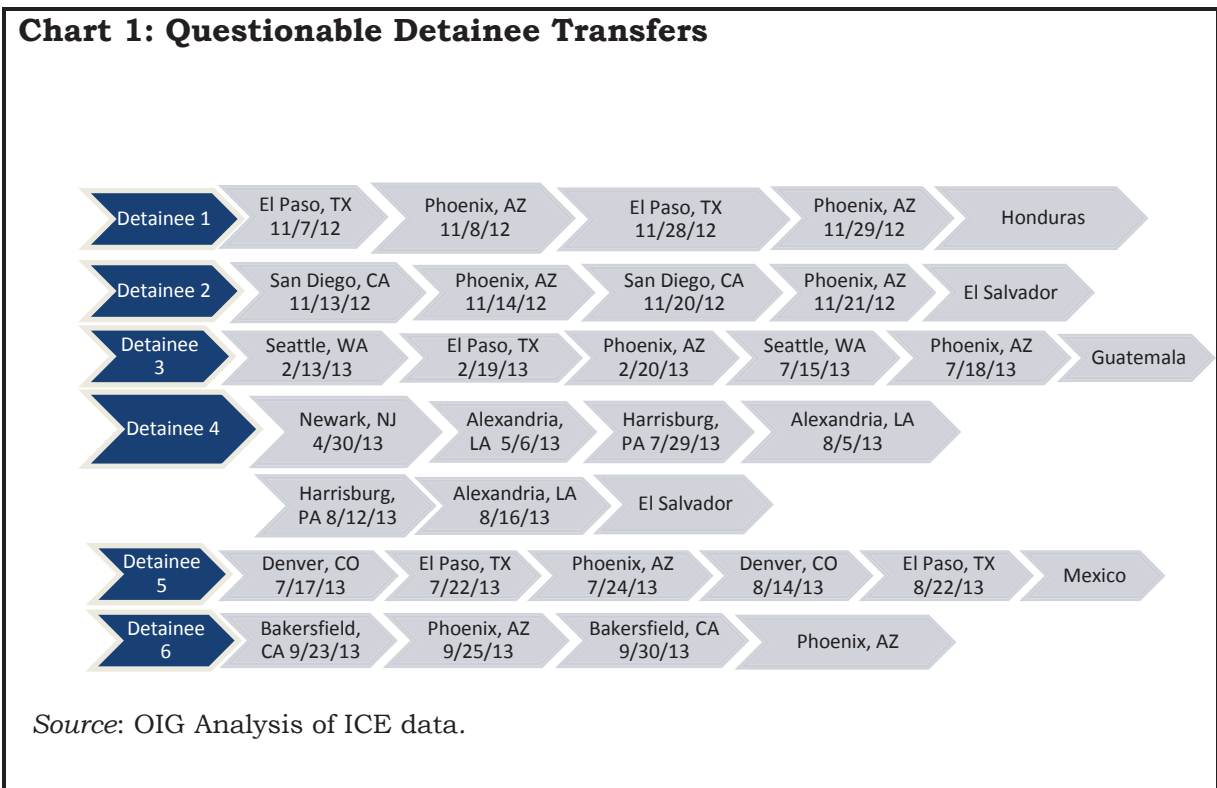


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Each time a scheduled detainee does not board a flight, the flight operates less efficiently. ICE Air management provided several reasons for empty seats. For example, ICE Air may remove detainees scheduled to travel from the manifest because of fear of returning to their country, missing travel documents, and medical reasons. However, 69 percent of all detainees scheduled to be on the flights who did not show up for travel were recorded as “no show” or the field was left blank. Without documenting the reason the detainee missed the flight, ICE Air does not have the information to correct potential problems in the process.

Redundancy when Transporting Detainees

A limited analysis of detainees transferred multiple times identified six detainees with redundant transfers that may not have been necessary. ICE Air moved all six detainees multiple times between the same cities. It was not possible to determine whether the transfers were necessary based on the ARTS information available. ERO does not collect and analyze data related to redundant transfers to determine the frequency, causes, or possible solutions. ICE Air officials said that detainees transfer back to the field office if travel documents are missing or for detainee medical reasons. Chart 1 illustrates the questionable transfers:





Tracking Time and Cost for Each Mission Stop

ICE Air needs to identify and track the time and cost for each mission stop. Each charter mission may involve as many as nine stops, and each route varies in distance and travel time. ICE Air only captures information regarding the cost and flight hours for the overall mission rather than for each stop. Therefore, if ERO wants to improve a mission's efficiency by changing a stop location or removing a stop from a route, it does not have sufficient data to assess the impact associated with an individual stop.

ICE Air may have missed opportunities to improve its operations. Based on our analysis of flight capacity in appendix F, ICE Air may have been able to save up to \$41.1 million to transport detainees had it operated each flight at full capacity. Although we realize that operating at full capacity is not always possible and may result in additional cost, the potential cost savings illustrates the need for better planning, management, and reporting.

Conclusion

Although ICE Air met its mission by transporting 930,435 detainees over a 3-1/2-year period, it may have been able to use its resources more effectively. ICE Air does not capture complete and accurate data essential to support operational decisions and does not have a mechanism in place to obtain feedback on how well its processes are performing.

These shortfalls occurred because ERO did not develop a data management plan, assess its staffing and training needs, and implement formal guidance to support successful daily operations. As a result, ERO management may have missed opportunities to improve the program's overall effectiveness. In addition, ICE Air operated charter flights with empty allowable seats and could realize cost savings of up to \$41.1 million once it determines optimum flight capacity.

Recommendations

Recommendation 1: We recommend that the Executive Associate Director for Enforcement and Removal Operations provide formal policies and procedures for the ICE Air Operations program to ensure that it operates efficiently and that resources are used effectively to achieve the desired objectives. These procedures should address, at a minimum:



- a. clearly defined roles and responsibilities,
- b. performance measures, and
- c. reporting standards.

Recommendation 2: We recommend that the Executive Associate Director for Enforcement and Removal Operations assess and provide the staffing and training needed to ensure effective air transportation of detainees.

Recommendation 3: We recommend that the Executive Associate Director for Enforcement and Removal Operations develop and implement a Data Management Plan to ensure ICE Air Operation's data is accurate, complete, and reliable to support analysis and decision-making.

Recommendation 4: We recommend that the Executive Associate Director for Enforcement and Removal Operations conduct a comprehensive assessment of the Transportation and Removal Program to identify factors that affect detainee air transportation's efficiency, such as capacity levels; reasons detainees are removed from the manifest; reasons for redundant transfers; and time and cost for each mission stop. It should also develop a plan to prioritize and address the critical factors annually to demonstrate ICE Air Operations is using its resources effectively.

ICE's Comments to the Draft Report

ICE provided comments on the draft of this report. A copy of the response, in its entirety, is included in appendix C. ICE disagreed with the use of empty seats as a measure of efficiency, citing that delaying the removal of individuals to fill empty seats may incur higher costs, and that there are factors that are more important than seat cost. As noted in our report, we agree that an analysis of the data needs to occur for ICE to know what is most efficient when transporting detainees. The analysis of empty seats is only one method ICE may consider to help identify factors that may improve efficiency. ICE also provided technical comments and suggested revisions to our report in a separate document. We reviewed ICE's technical comments and made changes throughout our report where appropriate.

OIG Analysis of ICE's Comments

Management Comments to Recommendation #1

Concur. ICE ERO indicated it is working on formal policies and procedures to ensure that resources are effectively used to achieve the desired objectives. ICE expects to complete and issue the documents by December 31, 2015.



OIG Analysis

We consider ICE's ongoing actions responsive to the recommendation. This recommendation is considered open and resolved until ICE ERO provides documentation that the planned corrective actions are completed and implemented.

Management Comments to Recommendation #2

Concur. ICE ERO stated that since the audit was conducted, ICE Air hired 58 employees out of 62 authorized positions. In addition, ICE Air is training Enforcement and Removal Assistants and Flight Schedulers on the new processes of scheduling flights, tracking flights, and performing quality checks on the scheduling process. All activities should be completed by July 31, 2016.

OIG Analysis

We consider ICE's actions responsive to the recommendation. This recommendation is considered open and resolved until ICE ERO provides documentation that the planned corrective actions are completed.

Management Comments to Recommendation #3

Concur. ICE ERO stated it is developing a Data Management Plan that will ensure that ICE Air's data is accurate, complete, and reliable to support analysis and decision making. In addition, ICE Air is working with the ERO Law Enforcement and Systems Analysis Division, as well as the field offices, to focus on data integrity, and better track the reasons scheduled passengers do not board flights. ICE Air is also working to collect, clean up, store, and reconcile flight mission data. ICE expects to complete all corrective actions by November 30, 2016.

OIG Analysis

We consider ICE's ongoing actions responsive to the recommendation. This recommendation is considered open and resolved until ICE ERO provides documentation that the planned corrective actions are completed.

Management Comments to Recommendation #4

Concur. ICE ERO stated it plans to complete a comprehensive assessment of the Transportation and Removal Program to identify factors that affect detainee air transportation's efficiency. The assessment also depends upon the successful completion and implementation of the Data Management Plan discussed in recommendation 3. ICE provided a completion date of March 31, 2017.



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OIG Analysis

We consider ICE's ongoing actions responsive to the recommendation. This recommendation is considered open and resolved until ICE ERO provides documentation that the planned corrective actions are completed.



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Appendix A Transmittal to Action Official




OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

APR 9 2015

MEMORANDUM FOR: Thomas Homan
Executive Associate Director
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement

FROM: Mark Bell 
Assistant Inspector General for Audits

SUBJECT: *ICE Air Transportation of Detainees Could Be More Effective*

Attached for your action is our final report, *ICE Air Transportation of Detainees Could Be More Effective*. The report identifies measures the U.S. Immigration and Custom Enforcement can take to improve the Air Operation program's overall effectiveness.

The report contains four recommendations aimed at improving the effectiveness of the program. Your office concurred with all of the recommendations. Based on information provided in your response to the draft report, we consider all of the recommendations open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to appropriate congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Paul Wood, Acting Deputy Assistant Inspector General for Audits, at (202)254-4100.

Attachment



Appendix B

Objective, Scope, and Methodology

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

We conducted this audit to determine whether ERO's processes for the air transfer and removal of detainees ensure the most effective use of resources. The scope consisted of a review of air transportation of detainees during fiscal year (FY) 2011 through second quarter FY 2014. We reviewed the internal controls for ICE Air as it relates to charter operations.

To accomplish our objective we conducted site visits to ICE Headquarters in Washington DC; ICE Air Headquarters in Mesa, AZ; and ICE field offices in Phoenix and Florence, AZ; Miami, FL; and Houston, TX. We obtained and reviewed pertinent Federal, departmental, and ICE specific regulations, policies, procedures, and guidance relevant to the Air Operations program. At each location, we interviewed ICE officials and staff responsible for the management, oversight, and execution of the ICE Air Operations program for detainees. In Mesa, we observed the detention, staging, and aircraft boarding operations for ICE Air charter flights.

In addition, we conducted data analysis of the ARTS, used to document ICE Air charter missions. To determine the accuracy and completeness of recorded data, we analyzed the data fields and entries used to record transported detainees for anomalies, errors, and omissions. We found numerous errors and omissions regarding the gender, criminality, status, gang affiliation, and recorded pick-up and drop-off locations of individual detainees; rendering much of the detainee data unreliable for further analysis, as discussed in the body of our report.

Despite these limitations, we determined that the recorded mission date, flight hours, number of detainees, mission cost, and mission routes were sufficiently accurate and complete to allow for an analysis of the capacity of chartered missions pertinent to our audit objective. We selected a random sample of 32 missions and verified data recorded in the ARTS database to the detainee manifests and vendor invoices for each of the sampled missions. We also compared the total cost recorded in the ARTS database to the amounts



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reported in ICE's financial reporting system. We compared the number of detainees reported as removed in the ARTS database to the number of detainees reported as removed in an ICE Air charters briefing document.

We determined that the ARTS database contained 7,951 missions to transport 930,435 detainees at a total cost of about \$456 million for the period October 1, 2010, to March 31, 2014. Of these missions, 7,445 used a 136-passenger aircraft to transport 857,421 detainees at a total recorded cost of \$448 million for the scope period. The remaining 506 missions were either canceled, for long-range international charters, or other missions flown using smaller aircraft.

To determine the efficiency of the 7,445 charter missions:

- We selected all 4,136 domestic missions and a judgmental sample of 1,563 international missions for analysis. The selected missions transported 668,142 detainees at a total recorded cost of \$327.4 million.
- The 4,136 domestic missions analyzed transported 491,084 detainees at a total cost of \$231.3 million.
- The 1,563 international missions sampled transported 177,058 detainees at a recorded total cost of \$96.1 million.
- We analyzed the selected missions to determine the percentage of available seats used.

See appendix E for the results of our analysis.

We conducted this performance audit between May and November 2014 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.



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Appendix C Immigration and Customs Enforcement Comments to the Draft Report

Office of Management and Administration

U.S. Department of Homeland Security
500 12th Street, SW
Washington, D.C. 20536



**U.S. Immigration
and Customs
Enforcement**

March 17, 2015

MEMORANDUM FOR: Mark Bell
Assistant Inspector General for Audits
Office of Inspector General

FROM: Radha C. Sekar 
Executive Associate Director
Management and Administration

SUBJECT: Management Response for OIG Draft Report, "ICE Air
Transportation of Detainees Could Be More Effective" dated
February 9, 2015 (OIG Project No. 14-093-AUD-ICE)

Thank you for the opportunity to review and comment on the subject draft report. U.S. Immigration and Customs Enforcement (ICE) appreciates the Office of Inspector General's (OIG) work in planning and conducting its review and issuing this report on the effectiveness of detainee transportation.

ICE is pleased to note the OIG's recognition that ICE's Office of Enforcement and Removal Operations' (ERO) air transfer program was meeting its mission of transporting detainees and had found ways to reduce costs.

ICE, as its actions have shown, remains fully committed to improving the efficiency of its removal operations. Even prior to this audit, ICE was able to save over \$27 million by switching from the Justice Prisoner and Alien Transportation System (JPATS) to ICE Air Operations (ICE Air) in October 2011. ICE leadership had already identified many of the points raised in the OIG's recommendations as issues of interest, and had begun addressing them prior to OIG commencing its review.

It is important to note that when the OIG conducted their fieldwork from March through November 2014, ICE Air was in the middle of a major consolidation and transition. During the past eight months, ICE Air has made great strides, addressing a myriad of staffing, training, data integrity, management, and systems modernization efforts in response to the anticipated final report.

However, we do disagree with one element in the report - the use of empty seats as an index of efficiency. The use of empty seats on charter flights is not a practical measure

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of efficiency for two reasons. First, delaying the removal of individuals in order to fill empty seats incurs costs that may exceed the cost of empty seats. Second, there are several factors that may be more important than seat cost that prevent ICE from filling 100 percent of charter flight seats.

As the report strongly argues, the use of ICE Air should be a data-driven decision. ICE believes that both detention and removal costs, as well as current operational priorities, must be considered in the equation on the scheduling of ICE Air missions. As of December 31, 2014, the average detention bed rate is approximately \$122 per day. It makes no fiscal sense to delay a large group of detainees to fill a small number of vacant seats.

Just as commercial pilots must reduce the number of passengers based on environmental conditions at takeoff for some aircraft, ICE Air must reduce the number of passengers it brings on certain charter flights based on the rules of some countries. Also, if a person becomes ill and is unable to fly, and no alternative is available, the cost of one seat may not be worth the expense of waiting for an alternate to fill the seat. Seat capacity and associated justifications for not flying full are dependent on a number of factors which include, but are not limited to, operational priorities; available detention space and associated detention costs; allowable numbers to be manifested for a specific country; and, what makes sense for a particular mission.

The draft report contained four recommendations with which ICE concurs. Specifically, OIG recommended that ICE's Executive Associate Director for Enforcement and Removal Operations:

Recommendation 1: Provide formal policies and procedures for ICE Air Operations (ICE Air) to ensure that it operates efficiently and that resources are effectively used to achieve the desired objectives. At a minimum, these procedures should address the following: (a) clearly defined roles and responsibilities, (b) performance measures, and (c) reporting standards.

Response: Concur. ICE ERO is working on formal policies and procedures for ICE Air to ensure that it operates efficiently and that resources are effectively used to achieve the desired objectives. In addition, various standard operating procedures (SOPs) for flight schedulers and data management staff have already been promulgated and are currently in use.

We request that this recommendation be considered resolved and open pending completion of the aforementioned activities. Estimated Completion Date (ECD): December 31, 2015.

Recommendation 2: Assess and provide the staffing and training needed to ensure the effective air transportation of detainees.

Response: Concur. Since the audit was conducted, ICE Air has hired a full complement of staff of 58 personnel (out of a total of 62 authorized positions, resulting in a staffing



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level of nearly 94 percent). ICE has completed the consolidation and transition of its workforce from Kansas City, MO to Mesa, AZ. Contractors have been replaced by Government personnel, who have been trained in the new processes. ICE Air employees (Enforcement and Removal Assistants / Flight Schedulers) are being trained on the new processes of scheduling flights, tracking flights, and performing quality checks on the scheduling process through On the Job Training and written SOPs. Ongoing training will occur for all new employees to ensure the effective air transportation of detainees.

We request that this recommendation be considered resolved and open pending completion of the aforementioned activities. ECD: July 31, 2016.

Recommendation 3: Develop and implement a Data Management Plan to ensure that IAO's data is accurate, complete, and reliable to support analysis and decision-making.

Response: Concur. ICE ERO is developing and implementing a Data Management Plan to ensure that IAO's data is accurate, complete, and reliable to support analysis and decision-making. ICE Air is working with the ERO Law Enforcement and Systems Analysis Division (LESA), as well as the field offices, to continue to focus on data integrity, and better track the reasons for which scheduled passengers fail to show at the flight line or are rejected at the flight line for lack of sufficient documentation. ICE Air and LESA have implemented a plan to collect charter flight mission data, clean up the data provided by field offices, store data, and reconcile data across data bases. Also, the programs are working closely with Headquarters to address statistical reporting requirements, with a priority on metrics and performance measures.

The Data Management Plan is currently being drafted with extensive input from data management subject matter experts, ICE Air operational staff as well as senior leadership, and is expected to be finalized, implemented and adjusted, as needed, to ensure accurate, complete and reliable data. These efforts are ongoing and considered to be a high priority long-term project for ICE Air.

We request that this recommendation be considered resolved and open pending completion of the aforementioned activities. ECD: November 30, 2016.

Recommendation 4: Conduct a comprehensive assessment of the Transportation and Removal Program to identify factors that affect detainee air transportation's efficiency, such as: capacity levels; reasons detainees are removed from the manifest; reasons for redundant transfers; and time and cost for each mission stop. It should also develop a plan to prioritize and to address the critical factors annually to demonstrate that IAO is using its resources effectively.

Response: Concur. ICE ERO is working on conducting a comprehensive assessment of the Transportation and Removal Program to identify factors that affect detainee air transportation's efficiency. The assessment is concurrent with and reliant upon the successful completion and implementation of the Data Management Plan discussed in recommendation 3. Also, ICE is working closely with Headquarters to address statistical reporting requirements, with a priority on metrics and performance measures.



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We request that this recommendation be considered resolved and open pending completion of the aforementioned activities. ECD: March 31, 2017.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Should you have any questions, please contact Michael Moy, Senior Portfolio Manager, at (202) 732-6263 or by email at Michael.C.Moy@ice.dhs.gov. We look forward to working with you in the future.



Appendix D ICE Air Operational Costs

	2011	2012	2013		Total
Charter	\$124,660,618	\$125,610,645	\$125,901,869	\$87,925,214	\$464,098,346*
Commercial	33,677,042	33,074,231	30,980,147	11,803,201	109,534,621
Payroll & Benefits	4,508,993	5,576,596	6,134,360	3,385,406	19,605,355
	314,905	99,296	2,633,111	1,946,909	4,994,221
Total	\$163,161,558	\$164,360,768	\$165,649,487	\$105,060,730	\$598,232,543

Source: OIG tabulation of ICE's financial data. We did not validate this data.

*Total charter costs may include travel expenses for employees as well as detainees.



Appendix E Analysis of Charter Missions

An analysis of 5,699 domestic and international missions selected for the scope period, October 1, 2010, through March 31, 2014, revealed that missions operated under capacity.

Domestic missions account for 52 percent of all charter flights. The analysis included all the domestic missions.

Domestic Missions

Percent of Allowable Seats Used	Missions	Detainees Transported	Mission Cost
< 40%	276	9,205	\$11,051,460
40% – 60%	638	44,280	\$33,794,267
61% – 79%	778	73,860	\$43,940,621
>80%	2,444	363,739	\$142,525,371
Total	4,136	491,084	\$231,311,719

For international missions, ICE Air flew most to Guatemala, Honduras, and El Salvador. The analysis reviewed 1,563 missions that represented about 47 percent of all international missions, at a recorded cost of \$96 million. The sample of international missions includes all direct mission routes to these three countries. Direct missions begin at a U.S. city, depart to one international country, and return to the United States.

Direct International Missions to Guatemala, Honduras, and El Salvador

Percent of Allowable Seats Used	Missions	Detainees Removed	Mission Cost
< 40%	21	474	\$799,376
40% – 60%	86	5,818	\$5,423,042
61% – 79%	179	16,711	\$11,559,653
> 80%	618	76,436	\$36,660,908
Total	904	99,439	\$54,442,979



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The sample of international missions also included 659 non-direct missions representing the top 4 routes to each of these countries. A non-direct mission contains stops at domestic cities and one or more international countries.

**Non-Direct International Missions to
Guatemala, Honduras, and El Salvador**

Percent of Allowable Seats Used	Missions	Detainees Removed	Mission Cost
< 40%	2	80	\$132,190
40% – 60%	30	2,128	\$1,867,690
61% – 79%	111	10,411	\$6,996,679
> 80%	516	65,000	\$32,655,387
Total	659	77,619	\$41,651,946



Appendix F Potential Cost Savings

To calculate ICE Air’s potential for cost savings, we determined the maximum amount of potential cost savings ICE Air could have achieved if the flights had operated at full capacity and all other factors remained constant. This estimate is based on the average of charter costs incurred during the scope period for the missions analyzed. This calculation is an indicator of ICE Air’s potential for future cost savings, actual expenses would include additional costs such as, detention costs and medical care. Such expenses cannot be projected and may reduce the amount of ICE Air’s future cost savings. We understand ICE Air cannot always use all allowable seats on every flight, but we believe ICE Air can improve the efficiency of its operations.

Table 2 illustrates the number of detainees transported for the missions reviewed by country, divided by the number of available seats for the respective countries. Each country determines the maximum number of detainees it is willing to receive per flight. ICE Air cannot control this number, and it can sometimes vary.

Table 2. Estimated Number of Flights Needed FY 2011 – 2nd QTR FY 2014			
Country	Detainees Transported	Maximum Detainees per Flight	Estimated Flights Needed
	(C)	(D)	(C)/(D) = (F)
Guatemala (Direct)	55,794	135	414
Honduras (Direct)	27,719	135	206
El Salvador (Direct)	15,926	120	133
Guatemala (Non-Direct)	35,006	135	260
Honduras (Non-Direct)	24,871	135	185
El Salvador (Non-Direct)	17,742	120	148
Domestic	491,084	135	3,638



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Next the average cost per mission was determined. See table 3.

Table 3. Average Cost per Mission			
Country	Missions	Mission Costs	Average Cost per Mission
	(A)	(B)	(B)/(A) = (E)
Guatemala (Direct)	478	\$29,063,131	\$60,802
Honduras (Direct)	261	\$14,878,081	\$57,004
El Salvador (Direct)	165	\$10,501,767	\$63,647
Guatemala (Non-Direct)	286	\$17,442,787	\$60,989
Honduras (Non-Direct)	205	\$12,084,712	\$58,950
El Salvador (Non-Direct)	168	\$12,124,447	\$72,169
Domestic	4136	\$231,311,719	\$55,926

Last, the average cost per mission is multiplied by the number of flights needed to determine the estimated cost for flights operated at full capacity. ICE Air’s mission costs less the estimated costs of flights at full capacity yield the estimated potential cost savings. This estimate is based on the average of costs ICE Air incurred during the scope period. Actual costs, including additional costs for detainee detention can not be projected and may reduce the amount of savings (see table 4). We are not claiming this figure as a funds put to better use.

Table 4. Estimated Potential Cost Savings			
Country	Mission Costs	Estimated Cost of Flights at Full Capacity	Estimated Potential Cost Savings
	(B)	(F)*(E) = (G)	(B) - (G)
Guatemala (Direct)	\$29,063,131	\$25,172,028	\$3,891,103
Honduras (Direct)	\$14,878,081	\$11,742,824	\$3,135,257
El Salvador (Direct)	\$10,501,767	\$8,465,051	\$2,036,716
Guatemala (Non-Direct)	\$17,442,787	\$15,857,140	\$1,585,647
Honduras (Non-Direct)	\$12,084,712	\$10,905,750	\$1,178,962
El Salvador (Non-Direct)	\$12,124,447	\$10,681,012	\$1,443,435
Domestic	\$231,311,719	\$203,458,788	\$27,852,931
Total Potential Cost Savings			\$41,124,051

Source: DHS OIG Analysis of ICE Alien Removal Transportation System Mission Data.



Appendix G

Office of Audits Major Contributors to This Report

Patrick O'Malley, Director
Yesenia Starinsky, Audit Manager
Philip Emswiler, Program Analyst
Carolyn Floyd, Auditor
Enrique Leal, Auditor
Eliece Pizarro, Auditor
Kevin Dolloson, Communications Analyst
Gary Alvino, Independent Report Referencer



Appendix H

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