



# Department of Homeland Security Office of Inspector General

## Review of the U.S. Customs and Border Protection Expenditure Plans for the American Recovery and Reinvestment Act of 2009



*American Recovery and Reinvestment Act of 2009*



Homeland  
Security

October 22, 2009

Preface

The Department of Homeland Security (DHS) Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*. This is one of a series of audits, inspection, and special reports prepared as part of our oversight responsibilities for programs, grants and projects awarded by the department under the *American Recovery and Reinvestment Act of 2009*.

This report includes observations of the U.S. Customs and Border Protection's efforts to manage funds appropriated by the *American Recovery and Reinvestment Act of 2009* and identifies issues that should be addressed by U.S. Customs and Border Protection to improve the management of those funds. The recommendation highlighted in this report is based on interviews with employees and officials of relevant agencies and institutions, direct observations, and a review of applicable documents.

We developed the recommendation based on the best knowledge available at the time, and we discussed them with those responsible for implementation. We trust this report will result in more effective, efficient, and economical operations. We express our appreciation to all of those who contributed to the preparation of this report

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

Richard L. Skinner  
Inspector General

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## Abbreviations

CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
FY	Fiscal Year
GSA	General Services Administration
ICE	U.S. Immigration and Customs Enforcement

# OIG

*Department of Homeland Security  
Office of Inspector General*

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## **Executive Summary**

The *American Recovery and Reinvestment Act of 2009* (Recovery Act) provided a total of \$680 million to the U.S. Customs and Border Protection (CBP). Of these funds Congress designated \$60 million for the procurement of tactical communications equipment; \$100 million for security fencing, infrastructure, and technology procurements for the Southwest border; \$100 million for the procurement of non-intrusive inspection equipment; and \$420 million for the construction of land ports of entry. We reviewed CBP's expenditure plans for these four areas.

CBP generally developed practical, thorough, and comprehensive expenditure plans for tactical communications modernization, Southwest border security technology, non-intrusive inspection equipment, and construction of CBP-owned land ports of entry. However, CBP could improve its plan to modernize and upgrade tactical communications by coordinating with the U.S. Immigration and Customs Enforcement to purchase similar equipment.

Although CBP expects to meet the goal of the Recovery Act's special contracting provision by competitively awarding fixed-price contracts, none of the expenditure plans meets the "quick-start" goal of using 50% of the stimulus funds for activities that CBP could initiate by June 17, 2009.

We recommend that CBP coordinate equipment procurements with the U.S. Immigration and Customs Enforcement agency to identify opportunities to maximize resources, such as taking advantage of volume discounts. CBP concurred with the recommendation.

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## Background

The *American Recovery and Reinvestment Act of 2009*, Public Law 111-5, (Recovery Act) was enacted on February 17, 2009, injecting \$787 billion in federal funds into the economy to preserve and stimulate economic growth in the United States. The Recovery Act made supplemental appropriations to federal departments and agencies for infrastructure investment, energy efficiency and science, assistance to the unemployed and disabled veterans, and state and local stabilization.

The Recovery Act provided DHS with approximately \$2.8 billion for equipment, construction, infrastructure improvement, and emergency management grants. Congress designated \$680 million of this amount to U.S. Customs and Border Protection (CBP), as follows:

<b>CBP Project Area</b>	<b>Allocation (in millions)</b>
Tactical communications modernization	\$60
Southwest Border security technology	\$100
Non-intrusive inspection systems	\$100
Alteration and construction of CBP's land ports of entry	\$420
<b>Total</b>	<b>\$680</b>

CBP issued an expenditure plan for each of these areas on April 3, 2009, as required by the Recovery Act. We reviewed these expenditure plans to determine whether they are practical, thorough, comprehensive, and designed to meet the goals of the Recovery Act. Further, we evaluated the plans according to prudent management principles, such as whether they contained risk mitigation and management control strategies. We did not evaluate the original process CBP used to establish its criteria or any underlying assumptions. Nor did we evaluate the cost estimates associated with the alteration and construction of CBP's land ports of entry.

### **Tactical Communications**

Nearly 40,000 law enforcement agents and officers depend on land mobile radio systems to help protect the Nation's borders. Many officers work in remote areas where commercial communications

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do not exist, and their radios are a primary communications lifeline. CBP's wireless tactical communications systems consist primarily of legacy, analog handheld radios and vehicular radio equipment that are not compliant with current standards for interoperability (known as P-25 standards), nor with federal mandates for the use of Advanced Encryption Standard and narrowband frequencies.<sup>1</sup> Prior to the Recovery Act, CBP planned to replace its noncompliant legacy tactical communications systems with interoperable, encrypted, narrowband equipment and radios. CBP and U.S. Immigration and Customs Enforcement (ICE) also planned to purchase similar tactical communications radios made by the same manufacturer.

### **Southwest Border Security Technology**

The goal of CBP's Secure Border Initiative Technology Program (*SBI<sub>net</sub>*) is to integrate new and existing border technology into a single, comprehensive border security system that will enable CBP to more effectively detect, identify, classify, and respond to illegal activity at the U.S. borders. CBP plans to procure surveillance technology such as mobile and fixed towers, cameras, radars, and unattended ground sensors with its Recovery Act funds.

### **Non-Intrusive Inspection Systems**

Non-intrusive inspection systems allow CBP to examine cargo and vehicles entering domestic ports without having to resort to the costly and time consuming process of unloading cargo for manual searches, or intrusive examinations by methods such as drilling and dismantling. CBP uses non-intrusive inspection systems at domestic ports of entry to support the detection of weapons of mass effect, radioactive materials, illicit drugs, currency, and other contraband. CBP's current inventory of non-intrusive inspection equipment consists of 224 large-scale x-ray and imaging systems and 3,391 small-scale systems such as mobile x-ray vans, mobile support systems, and fiberscopes.

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<sup>1</sup> The Department of Commerce, National Institute of Standards and Technology, requires federal agencies to use Advanced Encryption Standard to protect certain sensitive information, effective May 26, 2002 and the National Telecommunications and Information Administration requires all federal, land-mobile radio systems to use narrowband frequencies, effective January 1, 2008.

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## **CBP-Owned Land Ports of Entry**

CBP owns 43 of the Nation's 163 land ports of entry. (The General Services Administration (GSA) owns or leases 119 land ports of entry and the National Park Service owns one.) CBP-owned ports are primarily low-volume entry ports and most are located along the northern border of the United States. Most were built prior to the events of September 11, 2001, and designed to meet the land port of entry inspection needs of the 1960s and 1970s. GSA owns the high volume ports of entry such as those in Laredo, Texas and Nogales, Arizona. CBP has a multiyear strategy to modernize outmoded configurations and repair years of physical deterioration. This strategy is based on CBP's and the GSA's joint assessment of all 163 existing land ports of entry. The Recovery Act requires that DHS use its Recovery Act funds specifically for the land ports of entry owned by CBP.

## **Results of Review**

CBP generally developed practical, thorough, and comprehensive expenditure plans for tactical communications modernization, Southwest border security technology, non-intrusive inspection equipment, and construction of CBP-owned land ports of entry. However, CBP's plan to modernize and upgrade tactical communications could be improved by coordinating the effort with the U.S. Immigration and Customs Enforcement's purchase of similar equipment.

Although CBP expects to meet the goal of the Recovery Act's special contracting provision by competitively awarding fixed-price contracts, none of the expenditure plans meets the "quick-start" goal of using 50% of the stimulus funds for activities that could be initiated by June 17, 2009.

## **Plans Generally Practical, Thorough, and Comprehensive**

CBP's expenditure plans for tactical communications modernization, Southwest border security technology, non-intrusive inspection equipment, and construction of CBP-owned land ports of entry are generally practical, thorough, and comprehensive. However, CBP could improve its tactical communications plan by coordinating with ICE to purchase similar equipment.

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### **Tactical Communications Modernization**

CBP's expenditure plan to procure and deploy tactical communications equipment and radios is generally practical, thorough, and comprehensive, except that it does not include methods to coordinate with ICE for the procurement of similar equipment. CBP plans to divide the \$60 million that Congress appropriated for tactical communications modernization and upgrades among the following three project areas:

<b>Project Area</b>	<b>Planned Expenditures (in millions)</b>
<b>Houlton Focus Area</b> (complete radio frequency site infrastructure upgrades, National Environmental Protection Act evaluations, communications equipment purchase and installation, testing, and training on the modernized Houlton system)	\$45.2
<b>Internet Protocol Communications Console and Infrastructure Upgrades</b>	\$12.2
<b>El Paso Focus Area</b> (purchase a portion of the civil infrastructure equipment needed to modernize communications)	\$2.6
<b>Total</b>	<b>\$60.0</b>

#### ***Coordination with ICE***

CBP's plan does not include methods to coordinate with ICE's procurement of similar communications equipment. Although CBP and ICE have a memorandum of understanding that provides general direction for cooperation on tactical communications needs, the memorandum was signed before the Recovery Act was passed and is not specific to Recovery Act-funded projects. As a result, the memorandum of understanding may not be sufficient to ensure that cooperative planning for the use of Recovery Act funds takes place.



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By not coordinating these procurements, CBP could miss a cost-savings opportunity to leverage buying power through the consolidation of equipment purchases through the same manufacturer.

**Southwest Border Technology**

CBP’s expenditure plan to develop and deploy security technology on the Southwest border is generally practical, thorough, and comprehensive. CBP plans to divide the \$100 million Congress allocated for border security technology as follows:

<b>SBI Tactical Infrastructure</b>	<b>Planned Expenditures (in millions)</b>
Construction and deployment of surveillance and associated command and control technologies	\$50
Construction and deployment of Project 25, tactical communications	\$50
<b>Total</b>	<b>\$100</b>

CBP plans to use Recovery Act funding for high priority operational needs: deployment of surveillance and associated command and control technologies, and deployment of P-25 tactical communications. The Recovery Act funds will supplement existing resources on previously planned projects such as existing technology and communication contracts as well as financial and project management systems and schedules.

CBP used operational risk assessments to support its deployment strategies for border security technology on the southwest border. CBP officials indicated that planned Recovery Act spending may change if the Chief of the Border Patrol recommends funds be re-prioritized to respond to pressing security conditions. In that event, CBP indicated the *SBI<sub>net</sub>* plan would be modified and notification would be provided to DHS leadership and the appropriate congressional staffs.

**Non-Intrusive Inspection systems**

CBP’s expenditure plan to procure non-intrusive inspection systems is generally practical, thorough, and comprehensive CBP

plans to divide the \$100 million that Congress designated for non-intrusive inspection systems as follows:

<b>Non-Intrusive Inspection Equipment</b>	<b>Planned Expenditures (in millions)</b>
51 large-scale systems - 12 replacements and 39 new	\$86.7
242 small-scale systems - 178 replacements and 64 new	\$13.3
<b>Total</b>	<b>\$100.0</b>

Recovery Act funding will fall into two categories: replacements (technologies exceeding 10 years) and new equipment. CBP plans to deploy new equipment to ports of entry with identified technology shortages.

CBP used risk assessments and site-surveys to support its deployment strategies for non-intrusive inspection equipment. Risk assessments for large-scale equipment include mitigation strategies to reduce costs and procurement risk. CBP also considers the age of the large-scale non-intrusive inspection equipment and the amount of cargo traffic at the ports of entry. For small scale non-intrusive inspection equipment, CBP plans to determine which ports of entry will receive replacement or new equipment by performing on-site surveys among other factors. A typical on-site survey includes a comprehensive tour and review which includes electrical and power requirements and security and training requirements. In addition, CBP plans to comply with the National Environmental Policy Act and its implementing regulations.

**CBP-Owned Land Ports of Entry**

CBP’s expenditure plan for construction of CBP-owned land ports of entry is generally practical, thorough, and comprehensive. CBP plans to divide the \$420 million allocated for planning, management, design, alteration, and construction of land ports of entry as follows:

<b>Equipment</b>	<b>Planned Expenditures (in millions)</b>
Construction	\$374.0
Repairs and alterations	\$25.0
Program Management and Reporting System Development	\$21.0
<b>Total</b>	<b>\$420.0</b>

***Construction, Repairs, and Alterations***

CBP plans to spend \$374 million for construction at 23 of its 43 land ports of entry in the following 9 states: Maine (1 port), Montana (5 ports), New Hampshire (1 port), New Mexico (1 port), New York (2 ports), North Dakota (8 ports), Texas (1 port), Vermont ( 2 ports), and Washington (2 ports). (Please see Appendix C for a detailed list of ports targeted to receive Recovery Act funds.) CBP also plans to spend \$25 million to perform repairs and alterations to correct safety and functional deficiencies at all 43 locations, as needed.

CBP selected the 23 ports based on operational priorities, facility assessments, and project risk analysis. CBP’s construction and renovation plans include: expanding ports that are experiencing demands for increased through-put capacity by adding lanes, incorporating mission enhancements to meet current operational requirements, and addressing deteriorating physical conditions due to insufficient funding in the past. CBP selected 11 backup sites in the event that issues such as shifting operational and external priorities, evolving operational needs, local market factors affecting construction costs, or integration with other DHS initiatives and programs impede or delay the construction at the sites originally selected.

***Project Management and Reporting System***

CBP plans to spend \$21 million to acquire a lifecycle project management and reporting system. Although CBP intends to use this system to improve oversight of the construction projects, it may not be operational until the first quarter of FY 2011. By that time, over half of the projects will have reached their midpoint in construction. Thus, the lifecycle project management and reporting system may only benefit half of the planned construction time, and only 5 projects in their entirety. CBP plans to use an

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existing software program to monitor the construction projects until the proposed system is operational. Further, the department's Enterprise Business Management Office has not reviewed plans for the proposed system to determine whether it would be compatible with a DHS-wide enterprise architecture solution under development. Consequently, CBP risks developing a system that will not be compatible with the DHS-wide enterprise architecture solution.

## **Recovery Act Goals**

CBP expects to meet the goal of the Recovery Act's special contracting provision by competitively awarding fixed-price contracts. However, CBP's expenditure plans do not meet the "quick-start" goal of using 50% of the stimulus funds for activities that could be initiated within 120 days of the enactment of the Recovery Act.

### **Special Contracting Provision**

The special contracting provision (section 1554 of the Recovery Act) recommended that, to the maximum extent possible, recipients award fixed-price contracts through the use of competitive procedures. CBP will meet this goal if it implements its four expenditure plans as designed.

CBP plans to meet the special contracting provision by awarding new fixed-price contracts and using previously-competed contracts to procure tactical communications equipment. CBP plans to procure large scale non-intrusive inspection systems and border security technology through existing competitively bid fixed-price contracts. CBP plans to have full and open competition for small scale non-intrusive inspection equipment contracts. For land ports of entry, CBP planned to award predominantly firm-fixed contracts and design-build formats for the 23 construction projects. CBP also plans to use time-and-materials or labor-hour contracts<sup>2</sup> for some port construction and project management.

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<sup>2</sup> Time-and-materials contracts provide for acquiring supplies or services on the basis of direct labor hours at specified fixed hourly rates that includes wages, overhead, general and administrative expenses, profit, and the actual cost for materials. (Federal Acquisition Regulation, 1601(b)(1) and (2)) Labor-hour contracts differ from time-and-material contracts only in that materials are not supplied by the contractor. (Federal Acquisition Regulation, 16.602)

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### **Quick-Start Activities Provision**

The goal of the quick-start activities general provision (section 1602 of the Recovery Act) was to use at least 50% of the Recovery Act funds for activities that could be initiated within 120 days of the date that the Recovery Act was signed, or by June 17, 2009. Although CBP did not design any of its expenditure plans to meet this goal, CBP does plan to have all Recovery Act funds obligated by September 30, 2010, as required by the Recovery Act.

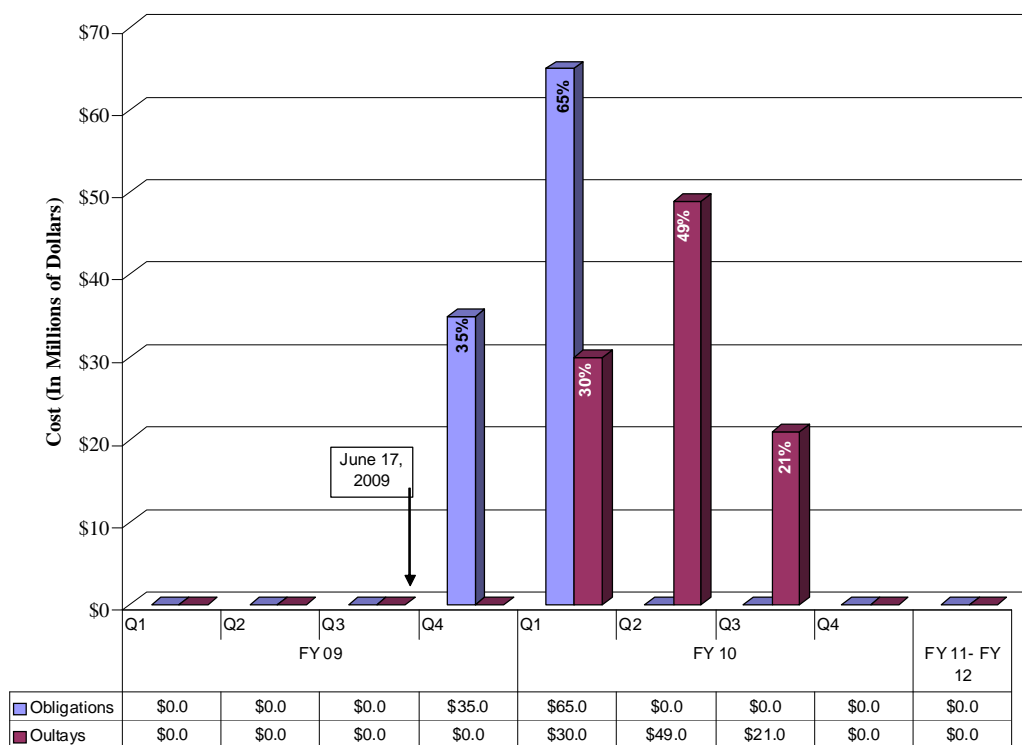
CBP's expenditure plans include a schedule for fund obligations and outlays for each project. An "obligation" is a commitment to pay for something and an "outlay" is an actual payment. Funds that have been obligated cannot be used for anything else and are considered spent. Obligated funds may stimulate the economy by increasing business operations, even though there may be a delay of months or years before obligated funds enter the economy as outlays.

### ***Tactical Communications Modernization***

As shown in the graph below, CBP intended to obligate 33% of the Recovery Act funds for tactical communications modernization by June 17, 2009. However, to meet the "quick-start" goal, CBP would have needed to obligate 50% of the funds by June 17, 2009. CBP plans to have 100% of the tactical communications funds obligated by the end of the first quarter of FY 2010.



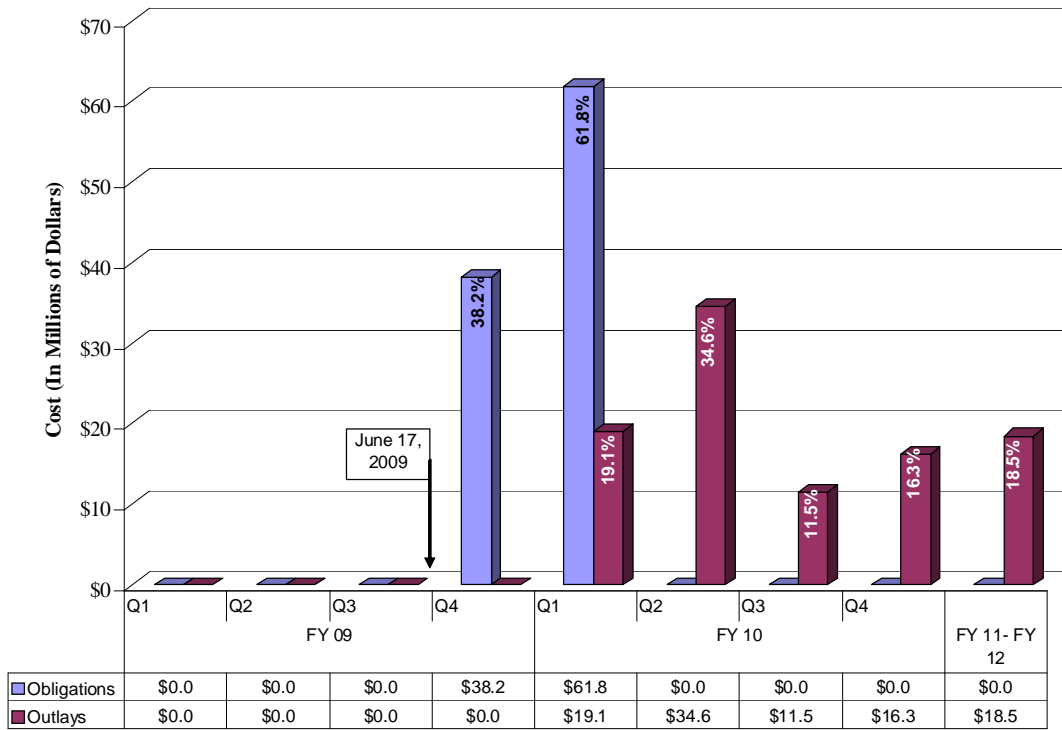
**Southwest Border Technology Obligations and Outlays**



***Non-Intrusive Inspection systems***

CBP officials told us that they did not intend to obligate any of the Recovery Act funds for non-intrusive inspection systems by June 17, 2009 because they could not responsibly obligate the funds that quickly. However, as depicted in the graph below, CBP does intend to obligate 38% of the Recovery Act funds by the end of FY 2009. CBP plans to obligate the remaining 62% of Recovery Act funding for non-intrusive inspection systems by the end of the first quarter in FY 2010. In addition to the Recovery Act funds, CBP received a \$30 million Congressional appropriation in FY 2009 for the procurement of non-intrusive inspection equipment. CBP must spend its FY 2009 appropriation before its Recovery Act appropriation.

**Non-Intrusive Inspection Systems Obligations and Outlays**

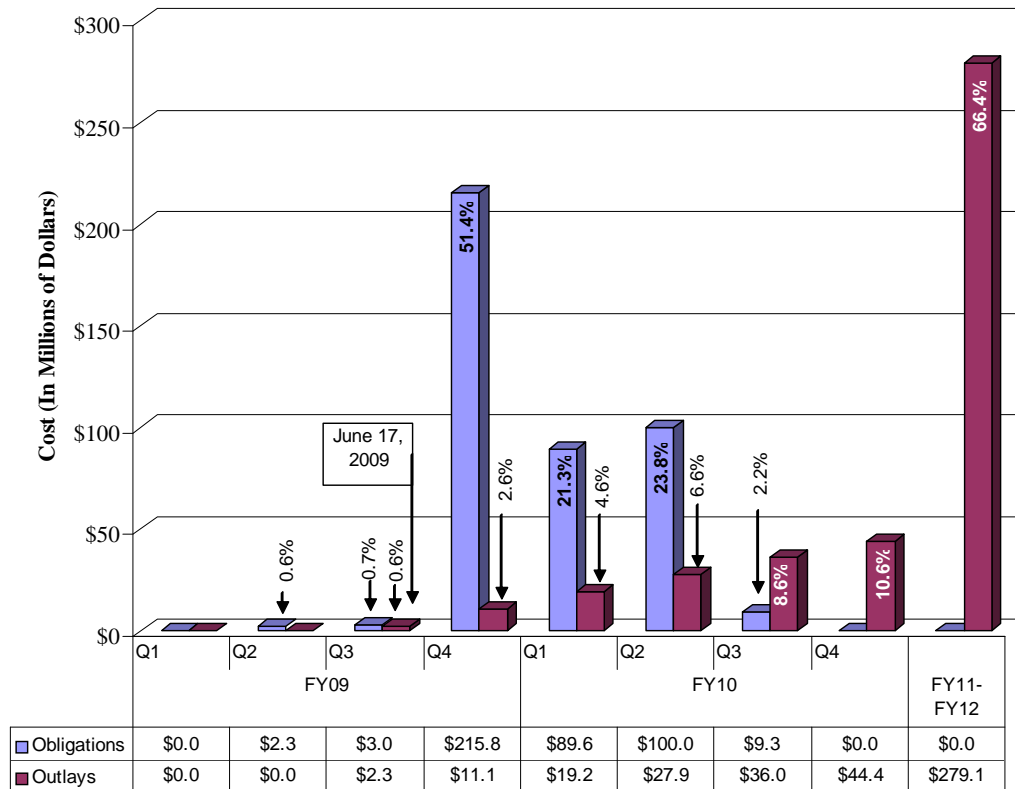


***CBP-Owned Land Ports of Entry***

As shown in the graph below, CBP estimated that it would only obligate \$5.33 million (1.3 %) for land ports of entry by June 17, 2009, or within 120 days of the enactment of the Recovery Act. However, CBP’s decision to use an existing prioritization methodology and existing previously-competed contracts with GSA and U.S. Army Corps of Engineers (Corps) will allow them to obligate more than 52% of the funds within 180 days, or by the end of the fourth quarter of FY 2009. CBP estimated that GSA and the Corps would begin their request for proposal process by June 2009.



**CBP Land Ports of Entry Obligations and Outlays**



**Recommendation**

We recommend that the Acting Commissioner for U.S. Customs and Border Protection develop detailed plans in conjunction with U.S. Immigration and Customs Enforcement for ensuring that Recovery Act funds are used to modernize tactical communications equipment in a cost-effective manner that will meet their respective mission needs.

**Management Comments and OIG Analysis**

CBP concurred with our recommendation and has stated that it has already instituted the planning necessary to form a joint program office to coordinate tactical communications deployments. CBP states that it will coordinate with ICE to conduct surveys, system design, engineering, and site acquisition and development in locations where both agencies are conducting modernizations at

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the same time. CBP will also coordinate with ICE by establishing project teams when working in locations independent of each other to ensure each others' future requirements are accounted for in the design. Finally, CBP, together with ICE and the Department of Homeland Security will develop a unified acquisition strategy and contract vehicle on behalf of the department that will support tactical communications acquisitions. We consider the recommendation resolved but open, pending receipt and review of information showing the program office has been established.

## Appendix A

### Purpose, Scope, and Methodology

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The objective of our review was to determine whether CBP developed practical and comprehensive plans for the construction of CBP-owned land ports of entry, southwest border technology, non-intrusive inspections systems, and tactical communications modernization programs. Our review included a determination of whether CBP followed its own criteria for prioritizing projects. We did not evaluate the original process CBP used to establish its criteria or any underlying assumptions. We:

To accomplish our review objective, we:

- Reviewed laws, regulations, and guidance related to the *American Recovery and Reinvestment Act of 2009*;
- Obtained information on the processes and controls in place for budgetary resources management and financial and contract management.
- Examined prior audit reports that provided suggested improvements in the program-specific areas and DHS acquisition management and acquisition workforce planning.
- Reviewed the department's Recovery Act expenditure plans for the construction of CBP-owned land ports of entry, southwest border technology, non-intrusive inspection systems, and tactical communications modernization programs;
- Reviewed documentation in support of the Recovery Act project expenditure plans, including program specific draft Recovery Act plans, and methodologies used to select projects targeted for Recovery Act expenditures; and
- Interviewed CBP's senior accountable official for the Recovery Act, as well as CBP officials from the offices of the Chief Information Officer, Financial Operations, Procurement, and the Port Modernization Program Management Office. We also interviewed staff from the *SBI*net, non-intrusive inspection systems, and tactical communications program management offices. We conducted these interviews at CBP headquarters and National Place offices in Washington DC.

We conducted our review between April and June 2009 under the authority of the *Inspector General Act of 1978*.

**Appendix B**  
**Management Comments**

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1300 Pennsylvania Avenue, NW  
Washington, DC 20229




**U.S. Customs and  
Border Protection**

Commissioner

**October 21, 2009**

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

FROM: Acting Commissioner   
US Customs and Border Protection

SUBJECT: Review of U.S. Customs and Border Protection Expenditure Plans  
for the American Recovery and Reinvestment Act of 2009 - FOUO

Thank you for providing us with a copy of the draft report entitled "Review of U.S. Customs and Border Protection Expenditure Plans for the American Recovery and Reinvestment Act of 2009 - FOUO," dated September 25, 2009. The Office of Inspector General (OIG) report summarizes the results of the OIG's review of Customs and Border Protection's (CBP) expenditure plan, which included the four areas to which Congress directed American Recovery and Reinvestment Act (ARRA) funds (tactical communications; security fencing, infrastructure and technology procurements for Southwest border; procurement of non-intrusive inspection equipment; and construction of land ports of entry).

The OIG concluded that CBP "generally developed practical, thorough, and comprehensive expenditure plans" for the four areas. The report also notes that "CBP selected the 23 ports (that were part of the spending plan), based on operational priorities and facility assessments and project risk analysis".

The report contains one recommendation with which CBP concurs, and is providing the following response.

**Recommendation 1:** Develop detailed plans in conjunction with U.S. Immigration and Customs Enforcement for ensuring that Recovery Act funds are used to modernize tactical communications equipment in a cost-effective manner that will meet their respective mission needs.

**Response:** CBP concurs with the recommendation and has already instituted the planning necessary to take these steps. As part of the mini Acquisition Review Board (ARB) process put in place for ARRA funds, CBP and ICE were asked to form a joint program office to coordinate

## **Appendix B**

### **Management Comments**

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tactical communications deployments. As a result, CBP and ICE met to lay the groundwork for a joint program office. As part of that plan, CBP and ICE determined that:

- In geographic locations where CBP and ICE are conducting modernizations at the same time, they collaborate on surveys, system design, engineering, and site acquisition and development;
- Where CBP and ICE are modernizing in an area independent of each other, they establish project teams to ensure each others' future requirements (e.g. shelter space, spectrum) are accounted for in the design; and,
- CBP, working in collaboration with the Department of Homeland Security (DHS) Headquarters and ICE, is developing a unified acquisition strategy and contract vehicle on behalf of DHS as a whole that will support Tactical Communications acquisitions.

Thank you again for the opportunity to comment. If you have any questions, please contact Robin White, Audit Liaison, Office of Internal Affairs, at (202) 344-1061.

**Appendix C**  
**CBP-Owned Land Ports of Entry Targeted to Receive Recovery Act Funding**

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<b>Location</b>	<b>Design/Build Cost</b>	<b>Contract Award</b>	<b>Project Completion</b>
Antelope Wells, New Mexico	\$15,169,565	FY 2010 Q 1	FY 2012 Q 1
Frontier, Washington	\$24,669,565	FY 2010 Q 2	FY 2012 Q 2
Scobey, Montana	\$14,969,565	FY 2009 Q 4	FY 2011 Q 4
Boundary, Washington	\$14,369,565	FY 2009 Q 4	FY 2011 Q 4
Los Ebanos, Texas	\$14,469,565	FY 2010 Q 2	FY 2012 Q 2
Walhalla, North Dakota	\$17,569,565	FY 2009 Q 4	FY 2011 Q 4
Neche, North Dakota	\$21,269,565	FY 2010 Q 2	FY 2012 Q 2
Morses Line, Vermont	\$15,669,565	FY 2010 Q 1	FY 2012 Q 1
Hamlin, Maine	\$18,669,565	FY 2010 Q 2	FY 2012 Q 2
Noonan, North Dakota	\$15,369,565	FY 2009 Q 4	FY 2011 Q 4
Antler, North Dakota	\$13,869,565	FY 2009 Q 4	FY 2011 Q 4
Wild Horse, Montana	\$15,869,565	FY 2009 Q 4	FY 2011 Q 4
Del Bonita, Montana	\$16,469,565	FY 2010 Q 1	FY 2012 Q 1
Cannons Corner, New York	\$17,369,565	FY 2010 Q 1	FY 2012 Q 1
Churubusco, New York	\$15,469,565	FY 2010 Q 1	FY 2012 Q 1
Hansboro, North Dakota	\$15,369,565	FY 2009 Q 4	FY 2011 Q 4
Pinnacle Road, Vermont	\$17,669,565	FY 2010 Q 1	FY 2012 Q 1
Pittsburgh, New Hampshire	\$14,869,565	FY 2009 Q 4	FY 2011 Q 4
Carbury, North Dakota	\$15,169,565	FY 2010 Q 2	FY 2012 Q 2
Westhope, North Dakota	\$14,969,565	FY 2009 Q 4	FY 2011 Q 4
Morgan, Montana	\$14,469,565	FY 2009 Q 4	FY 2011 Q 4
Whitetail, Montana	\$15,469,565	FY 2009 Q 4	FY 2011 Q 4
Sherwood, North Dakota	\$14,769,565	FY 2009 Q 4	FY 2011 Q 4
<b>Total</b>	<b>\$374,000,000</b>		

## **Appendix D**

### **Major Contributors to this Report**

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## **Appendix E**

### **Report Distribution**

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