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OFFICE OF INSPECTOR GENERAL

CBP and CWMD Need to Improve Monitoring and Maintenance of Radiation Portal Monitor Systems (REDACTED)

OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

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

April 27, 2022

MEMORANDUM FOR: The Honorable Chris Magnus
Commissioner
U.S. Customs and Border Protection

Gary Rasicot
Acting Assistant Secretary
Countering Weapons of Mass Destruction Office

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

JOSEPH V CUFFARI
Digitally signed by JOSEPH V CUFFARI
Date: 2022.04.20 20:16:01 -04'00'

SUBJECT: *CBP and CWMD Need to Improve Monitoring and Maintenance of Radiation Portal Monitor Systems – ~~For Official Use Only~~*

For your action is our final report, *CBP and CWMD Need to Improve Monitoring and Maintenance of Radiation Portal Monitor Systems– ~~For Official Use Only~~*. We incorporated the formal comments provided by your office.

The report contains two recommendations to improve the monitoring and maintenance of radiation portal monitor systems. Your office concurred with both recommendations. Based on information in your response to the draft report, we consider recommendation 1 resolved and closed and recommendation 2 resolved and open. Once your office has fully implemented recommendation 2, please submit a formal closeout letter to us within 30 days so that we may close the recommendation. 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 of 1978*, as amended, we will provide copies of our report to 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 Bruce Miller, Deputy Inspector General for Audits, at (202) 981-6000.

Attachment

DHS OIG HIGHLIGHTS

CBP and CWMD Need to Improve Monitoring and Maintenance of Radiation Portal Monitor Systems

April 27, 2022

Why We Did This Audit

CBP uses RPM systems as the primary means to scan for radiological and nuclear threats and materials at U.S. ports of entry. We conducted this audit in response to a hotline complaint. Our objective is to determine the extent to which CBP monitors and maintains its RPM systems in accordance with DHS acquisition guidelines, policies, and procedures.

What We Recommend

We made two recommendations to improve the monitoring and maintenance of CBP's RPM systems.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

U.S. Customs and Border Protection (CBP) and the Department of Homeland Security's Countering Weapons of Mass Destruction Office (CWMD) co-manage the Radiation Portal Monitor (RPM) program but do not monitor and maintain RPM systems to ensure they continue to meet needed capabilities. Although CBP monitors the operational availability of RPM systems, not all CBP ports of entry standard operating procedures include the requirement to conduct [redacted] operational checks to confirm RPM systems are mission capable, as required by CBP guidance. Specifically, [redacted] standard operating procedures we reviewed did not include the requirement for [redacted] operational checks at CBP ports of entry. This occurred because CBP's Office of Field Operations did not ensure local standard operating procedures included the requirement to conduct [redacted] operational checks of RPM systems.

Also, CBP and CWMD do not conduct periodic assessments of RPM systems to identify deficiencies, make minor enhancements, or define future capability needs, as required by DHS acquisition guidance. This occurred because CBP and CWMD do not have an agreed to plan to monitor, maintain, and support deployed RPM systems.

Without effective oversight and an agreed to plan, CBP and CWMD cannot ensure RPM systems are meeting critical system performance requirements or mitigating future radiological and nuclear vulnerabilities. Additionally, the Department may fund future systems without accurately defining capability needs. [redacted].

DHS Response

DHS concurred with both recommendations. We consider recommendation 1 resolved and closed and recommendation 2 resolved and open. Appendix A contains a copy of the Department's response in its entirety.

Background

U.S. Customs and Border Protection's (CBP) mission is to safeguard America's borders and protect the public from dangerous people and materials from entering the United States. CBP must also ensure the timely and efficient movement of legitimate trade and travel in support of the U.S. economy. On a typical day, CBP processes more than 1 million passengers and pedestrians, more than 70,000 pieces of cargo and conveyances, and more than 300,000 privately owned vehicles entering the United States through ports of entry.

To execute its mission, CBP Office of Field Operations (OFO) uses radiation portal monitor (RPM) systems as the primary means to scan for radiological and nuclear materials and threats at U.S. ports of entry. As of October 2020, CBP had 1,250 RPM systems deployed at seaports, land border crossings, airports, and international mail facilities. As shown in Figure 1, an RPM system consists of radiation sensor panels positioned on opposite sides of a lane through which a vehicle or container will pass.

Figure 1. RPM Lane in Use at a Land Port of Entry
Source: CBP

If the RPM system detects radiation above a set threshold, the machine will alarm to notify the CBP operator to conduct secondary screening. CBP's *Directive 5290-015B, Radiation Detection Standard Operating Procedures,* requires resolving all confirmed radiation detection alarms in secondary screening, if available, by identifying the type or nature of material or device that set off an alarm and assessing the potential threat that the material or device might pose. Threats include nuclear weapons or devices, special nuclear material, industrial or medical radionuclides, and potentially hazardous levels of radiation.

In 2002, the U.S. Customs Service, CBP's predecessor agency, began working to procure, install, and operate RPM systems in direct response to the September 11, 2001 terrorist attacks. Today, the Department of Homeland Security's Countering Weapons of Mass Destruction Office (CWMD) and CBP co-manage the RPM program. In October 2006, upon enactment of the *Security and Accountability for Every Port Act* (SAFE Port Act),[1] the DHS Domestic Nuclear Detection Office (DNDO) assumed authority for all RPM

[1] *Security and Accountability for Every Port Act of 2006,* Pub. L. 109-347.

program activities, including the evaluation, testing, acquisition, and deployment of RPM systems, as well as post-deployment activities, such as improving RPM systems and aligning the RPM program with CBP's operational needs.[2] In December 2018, the *Countering Weapons of Mass Destruction Act* transferred these responsibilities from DNDO to the newly established CWMD Office.[3] From fiscal year 2018 to 2020, CWMD spent approximately $68 million to redeploy, decommission, and improve the legacy fleet of RPMs. CBP retained the radiological and nuclear materials and threats interdiction mission and is responsible for RPM system maintenance and providing system requirements for enhancements and operational improvements. From FY 2018 to 2020, CBP spent approximately $43 million in RPM system maintenance costs.

DHS Guidebook 102-01-103-01, Systems Engineering Lifecycle Guidebook requires operations and maintenance be conducted to operate and maintain a system, make minor enhancements, identify ways to improve the system, and define future capability needs. According to the guidance, the system must be continuously monitored while in operation and problems should be identified and corrected to achieve performance requirements. Further, users and maintenance personnel should identify modifications to the system that are needed to resolve issues, enhance system performance, or provide new capabilities. We conducted this audit to determine to what extent CBP monitors and maintains its RPM systems in accordance with DHS acquisition guidelines, policies, and procedures.

Results of Audit

CBP Does Not Adequately Monitor Radiation Portal Monitors at Ports of Entry

CBP *Directive 5290-015B, Radiation Detection Standard Operating Procedures* requires RPM systems to be operated in accordance with the manufacturer's operating manual and established CBP training procedures, including CBP field operators performing [redacted] operational checks of the RPM systems to ensure they can detect radioactive materials. [redacted]. According to the directive, if an RPM system does not alarm, field operators are required to contact the Enforcement Technology Service Desk to initiate a maintenance work ticket. CBP allows each port of entry to issue local procedures to enhance those outlined in the

[2] 6 United States Code Section 592(a).
[3] *Countering Weapons of Mass Destruction Act of 2018,* Pub. L. 115-387.

directive if the local procedures meet the minimum requirements prescribed in the directive.

However, we found not all local standard operating procedures at the ports of entry included the requirement to conduct [redacted] operational checks to confirm RPM systems are mission capable, as required by the directive. We compared local procedures to the directive and identified [redacted] CBP ports of entry standard operating procedures that did not include the requirement for field operators to perform [redacted] operational checks, as stated in the directive. Further, [redacted] CBP ports of entry standard operating procedures reviewed did not include guidance on what to do if the RPM system was down and did not provide field operators with maintenance contact information.

This occurred because CBP OFO did not ensure ports of entry standard operating procedures followed the directive's requirement to conduct [redacted] operational checks of RPM systems. CBP conducts other types of assessments of the RPM system, such as operational availability and [redacted] recalibration, but these assessments do not ensure RPM systems continue to perform as intended. For example, CBP OFO monitors operational availability, which measures the time the RPM system is available to perform its mission as designed and required. Although operational availability measures the RPM system's readiness, it does not ensure it is mission capable to detect radioactive threats. An RPM system is only effective when it is both available and mission capable.

RPM systems [redacted] in the field because they do not have a state of health capability to alert field operators of real-time system failures. According to the Homeland Security Operational Analysis Center's April 2021 cost benefit analysis prepared for CWMD, [redacted] which can be detected by [redacted] operational checks.[4] However, [redacted]. In addition, if all ports of entry adhered to the directive, it would allow for earlier detection of necessary repairs and might mitigate risks and failures that impact RPM detection capability. As a result of our audit work, in January 2021, CBP OFO issued a memorandum requiring field office directors at the ports of entry to update the standard operating procedures.

[4] Homeland Security Operational Analysis Center, *Cost Benefit Analysis of Radiation Portal Monitor* [redacted] *Replacement*, [redacted], April 2021.

CBP and CWMD Do Not Effectively Maintain Radiation Portal Monitor Systems

CBP and CWMD do not conduct periodic assessments of RPM systems to identify deficiencies, make minor enhancements, or define future capability needs. The FY 2018 *Project Execution Plan for the Radiation Portal Monitor Program*[5] implemented a predictive assessment method to annually identify and replace degraded RPM panels caused by [redacted]. According to the FY 2018 plan, significant performance degradation occurs in RPM panels deployed [redacted] and because RPM systems do not have a state of health capability, an external analysis is required to determine if an RPM panel has failed from [redacted].

We found that CBP has not conducted periodic assessments since 2018 to identify and replace degraded RPM panels caused by [redacted]. CBP conducted an assessment, referred to as the [redacted], in 2017 and 2018, and replaced all RPM panels that were identified as needing immediate replacement. In the 2017 assessment, CBP examined 271 RPM panels, of which [redacted] were identified for replacement. The following year, in the 2018 assessment, CBP examined 1,095 RPM panels at [redacted] U.S. border ports of entry. Based on the 2018 assessment, [redacted] RPM panels were recommended for immediate replacement and [redacted] RPM panels were identified as showing some signs of degradation that should be considered for future replacement. Table 1 shows the results of the 2018 [redacted].

Table 1. 2018 Assessment of Panel Degradation

Rating	Number of RPM Panels Assessed	[redacted]
Do Not Require Replacement, No Signs of Degradation	845	[redacted]
Consider Replacement, Some Signs of Degradation	178	[redacted]
Recommend Immediate Replacement, Signs of Significant Degradation	72	[redacted]
Totals	1,095	[redacted]

Source: DHS Office of Inspector General (OIG) analysis of [redacted]

[5] *Project Execution Plan for the Radiation Portal Monitor Program FY 2018 – FY 2022,* October 2017.

CBP replaced [redacted] RPM panels recommended for immediate replacement and [redacted] RPM panels identified as showing some signs of degradation that should be considered for future replacement. However, CBP has not conducted this assessment since 2018 and does not know if the remaining [redacted] RPM panels identified as showing some signs of degradation now need immediate replacement or if other panels may need immediate replacement. According to CBP, the [redacted] was exploratory, and it is considering other methods to identify panel degradation. CWMD personnel informed us that they offered to perform the analysis for CBP if it provided the data, but CBP declined.

CBP does use other methods to assess RPM system performance and to determine RPM panel replacement. For instance, CBP conducts [redacted] recalibration to evaluate and restore RPM systems' performance. However, [redacted] recalibration is only a point-in-time evaluation and does not assess RPM system performance under different [redacted]. Although it is a valuable assessment, it does not ensure RPM systems will [redacted].

CBP and CWMD Do Not Have an Agreed to Plan to Monitor and Maintain RPM System Performance

These issues occurred because CBP and CWMD, co-managers of the RPM program, do not have an agreed-upon plan to monitor, maintain, and support deployed RPM system performance. According to *DHS Instruction 102-01-001, Acquisition Management Instruction*, effective sustainment of deployed systems relies on an Integrated Logistics Support Plan, which is developed to ensure a capability is provided with sufficient resources and activities to sustain it at the desired readiness level.

The RPM program does not have an Integrated Logistics Support Plan. According to CWMD, the RPM program was initialized in 2003 and pre-dated current acquisition policies and system engineering directives. Rather, in 2018, CBP and CWMD issued a Project Execution Plan to define work to be performed annually under the RPM program. However, CBP did not follow the 2018 Project Execution Plan, and as a result, there were no agreed to oversight activities of the RPM systems until CWMD issued a revised Project Execution Plan in February 2021. During our review, CWMD completed a cost benefit analysis to determine how to move forward with the aging fleet of RPM systems. However, an Operational Analysis is a recurring formal analysis conducted by the Program Manager and operator of a system.

In June 2021, CBP, not CWMD, issued a revision to the 2015 Integrated Logistics Support Plan for its Non-Intrusive Inspection (NII) systems program. The 2021 NII Integrated Logistics Support Plan incorporated radiation monitoring equipment. However, CBP and CWMD do not have an agreed-upon plan to perform periodic assessments as described in the DHS 102-01 acquisition guidance to identify deficiencies, make minor enhancements, or define future capability needs.

Without effective oversight and an agreed to plan, CBP and CWMD cannot ensure RPM systems are meeting critical system performance requirements or mitigating future vulnerabilities. In addition, the Department may fund and acquire future systems without accurately defined capability needs. [redacted].

Recommendations

Recommendation 1: We recommend the CBP Office of Field Operations ensure CBP ports of entry:

- update standard operating procedures by including mandatory operational checks of RPM systems and guidance (directions) on what to do when RPM systems are identified as inoperable; and
- conduct mandatory operational checks of RPM systems in accordance with updated guidance.

Recommendation 2: We recommend CBP and CWMD key stakeholders develop an agreed to support plan to monitor and sustain RPM systems that includes:

- An assessment of RPM panel condition; and
- Operational Analysis to assess RPM system performance and operations to identify evolving requirements and future capability needs, and changes to sustainment approach.

Management Comments and OIG Analysis

DHS concurred with both recommendations in this report. Appendix A contains a copy of the Department's response in its entirety. DHS also provided technical comments to our draft report, and we incorporated these comments, as appropriate. We consider recommendation 1 resolved and closed and recommendation 2 resolved and open. A summary of the Department's responses to the recommendations and our analysis follows.

Although agreeing with the report's recommendations, CBP and CWMD leadership expressed concern that the report does not discuss the positive

results accomplished by the jointly managed program and could be misleading to readers unfamiliar with the systems. We believe the report highlights CBP and CWMD's ongoing assessments of the RPM systems. However, as stated in the report, more assessments are needed to continuously monitor the RPM system performance to ensure the system is mission capable to detect radioactive threats.

DHS is also concerned that the report implies there are issues with [redacted] cycling but does not mention that CBP and CWMD have conducted research and development since 2017 of encapsulated polyvinyl toluene (PVT) to use at sites experiencing [redacted] degradation. Our analysis took into consideration the encapsulated PVT technology to be deployed as replacements when existing [redacted]. However, as noted in our report, CBP has not conducted periodic assessments referred to as the [redacted] since 2018 to identify and replace degraded RPM panels caused by [redacted]. With the implementation of recommendation 2, we expect that the periodic assessments to identify and replace degraded RPM panels will resume.

DHS also contended that the report incorrectly states that the Non-Intrusive Inspection systems Program's Integrated Logistics Support Plan (ILSP) does not include methods for examining whether RPM systems are meeting mission needs and baseline operational requirements, implying that CBP does not demonstrate effective oversight. As stated in our report, CBP and CWMD do not have an agreed to plan to monitor RPM systems in operation to identify and correct problems to achieve optimal performance requirements, or to properly identify future capability needs. The ILSP for Non-Intrusive Inspection systems does not specifically identify any maintenance support requirements for the RPM systems. Sound acquisition management requires clear policies and processes to properly sustain deployed capabilities and ensure these efforts achieve intended results.

Lastly, DHS expressed serious concerns that the OIG continues to include several statements in the draft report that CBP requested the OIG redact. The OIG worked with CBP's Office of Counsel to ensure all sensitivity concerns were properly addressed and resolved prior to issuance of the report.

DHS Response to Recommendation 1: Concur. On January 15, 2021, CBP Office of Field Operations (OFO) distributed a memorandum to the field office directors titled, "[redacted]" and distributed an associated muster memorandum to be used for a Weekly Muster for CBP offices on January 22, 2021. This memorandum informed CBP field office personnel of requirements and [redacted] to be added to local standard operating procedures. Additionally, it included requirements for

mandatory RPM function testing, including instruction and recourse if assistance is required.

OIG Analysis: CBP's corrective action is responsive to the recommendation. We consider the recommendation resolved and closed upon issuance of this report.

DHS Response to Recommendation 2: Concur. CBP OFO in consultation with CWMD Systems Support Directorate and other key stakeholders, as appropriate, will develop a plan to ensure that RPM system performance is monitored, and that there is clarity for conducting operational assessments of the deployed fleet to determine panel efficacy and RPM system performance and operations to identify evolving requirements and future capability needs, as well as changes to the sustainment approach. CBP OFO will update the NIID Program Execution Plan, as necessary. Estimated Completion Date: June 30, 2022.

OIG Analysis: CBP OFO's corrective action is responsive to the recommendation. We consider this recommendation resolved and open pending the completion of a plan to ensure the RPM system performance is monitored and an Operational Analysis is conducted.

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107–296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit in response to a hotline complaint. Our objective was to determine the extent to which CBP monitors and maintains its RPM systems in accordance with DHS acquisition guidelines, policies, and procedures. To accomplish our objective, we interviewed CBP staff from the OFO, Integrated Logistics Division, and Operational Field-Testing Division, as well as CWMD's Acquisition Division and Systems Support Directorate.

We researched and analyzed *DHS Instruction 102-01-001, Acquisition Management Instruction; and the DHS Guidebook, 102-01-103-01, Systems Engineering Life Cycle Guidebook*. We also obtained and analyzed relevant public laws, directives, and policies including:

- *Security and Accountability for Every Port Act of 2006,* Pub. L.109-347
- *CBP Directive 5290-015B, Radiation Detection Standard Operating Procedures Directive*, March 2014

- *Project Execution Plan for the Radiation Portal Monitor Program*, January 2018
- Title 6 United States Code Section 592, *Mission of Office* (describes CWMD responsibilities), 2006
- [redacted]

To determine whether CBP ports of entry standard operating procedures include a requirement for [redacted] operational checks of RPM systems, we compared 165 ports of entry standard operating procedures to *CBP Directive 5290-015B, Radiation Detection Standard Operating Procedures Directive* and the *Radiation Portal Monitor System User's Manual.*

We assessed the reliability of ports of entry standard operating procedures received from CBP OFO. To determine reliability, we compared the number of standard operating procedures received to the number of ports of entry and contacted knowledgeable ports of entry officials to verify standard operating procedures in effect for those ports of entry. Based on our audit work, we determined the standard operating procedures obtained were sufficiently reliable for the purposes of our audit.

To determine whether CBP and CWMD conducted periodic assessments of RPM systems, we reviewed the 2018 *Project Execution Plan for the Radiation Portal Monitor Program*, the April 2021 *Cost Benefit Analysis of Radiation Portal Monitor* [redacted] *Replacement*, the [redacted], and the *Evaluation of the* [redacted] *Radiation Portal Monitors in Use at U.S. Customs and Border Protection Ports of Entry.* We also reviewed *DHS Guidebook, 102-01-103-01, Systems Engineering Life Cycle Guidebook,* and interviewed personnel from CBP's Office of Field Operation, Integrated Logistics Division, as well as CWMD's Acquisition Division and Systems Support Directorate.

We assessed internal controls related to the RPM program's oversight of RPM systems. Our assessment disclosed that the RPM program lacked oversight and an agreed to plan to effectively maintain RPM systems. We discuss identified internal control weaknesses in the body of this report.

We conducted this performance audit between September 2020 and August 2021 pursuant to the *Inspector General Act of 1978, as amended*, and according to generally accepted government auditing standards. Those standards require 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 the evidence obtained

provides a reasonable basis for our findings and conclusions based upon our audit objectives.

The Office of Audits major contributors to this report are Carolyn Hicks, Director; Paul Exarchos, Audit Manager; Ardeth Savery, Auditor-in-Charge; Falon Strong, Auditor; Edgardo Prats-Reyes, Program Analyst; Lindsey Koch, Communications Analyst; and Katrina Burpo, Independent Referencer.

Appendix A
DHS Comments to the Draft Report

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

Homeland Security

March 11, 2022

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Jim H. Crumpacker, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

SUBJECT: Management Response to Draft Report: "CBP and CWMD Need to Improve Monitoring and Maintenance of Radiation Portal Monitor Systems" (Project No. 20-049-AUD-CBP)

Thank you for the opportunity to comment on this draft report. The Department of Homeland Security (DHS or the Department) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

Despite agreeing with the report's recommendations, U.S. Customs and Border Protection (CBP) and DHS Countering Weapons of Mass Destruction Office (CWMD) leadership are concerned that the report does not adequately discuss the positive results accomplished by the jointly managed program, and thus could be misleading to readers unfamiliar with the systems discussed in the report. For example, the report states that the Radiation Portal Monitor (RPM) systems are not assessed periodically to identify deficiencies, make minor enhancements, or define future capability needs. To the contrary, CBP Office of Field Operations (OFO) Cargo and Conveyance Security (CCS) Directorate, Non-Intrusive Inspection Division (NIID) and CWMD Systems Support Directorate (SSD) have steadily improved RPM performance since the deployment of these systems started in 2003, to include the implementation of Revised Operational Settings (ROS) and Enhanced Radiological Nuclear Inspection and Evaluation (ERNIE), which is a form of artificial intelligence. Both ROS and ERNIE have greatly reduced the number of "nuisance alarms" or benign alarms which equate to non-threat alarms, and represent examples of CBP and CWMD periodically accessing systems to identify deficiencies and address them, as appropriate.

In addition, the draft report implies there are issues with [redacted] but does not mention that since 2017, CBP OFO CCS NIID and CWMD SSD have conducted research and development of [redacted] to use at sites experiencing [redacted]. For example, CWMD and CBP completed a series of [redacted] in environmental chambers in from 2018-2020 ultimately validating that this technology would resolve the [redacted], and jointly held a Configuration Control Board in February of 2021 that approved this technology to be deployed to the field as replacements when existing [redacted].

The report also erroneously states that the Non-Intrusive Inspection (NII) Integrated Logistics Support Plan (ILSP) does not include methods for examining whether RPM systems are meeting mission needs and baseline operational requirements, thus implying that CBP does not demonstrate effective oversight. However, the NII ILSP, dated June 4, 2021, clearly defines support requirements and processes for support of the RPM subsystems, pursuant to DHS Management Directive 102-01, "Acquisition Management Directive (Revision 3.1"), dated February 25, 2019, and DHS Management Instruction 102-01-001, "Acquisition Management Instruction (Revision 1.3), dated January 21, 2021. Additional guidance on RPM maintenance, which has been implemented, is also provided in the Non-Intrusive Inspection/Radiation Portal Monitor Operations Center (NROC) Charter, dated December 10, 2018, as well as the OFO CCS Directorate memorandum titled, "[redacted]," dated January 15, 2021.

Further, OFO routinely captures lessons learned at quarterly NII program management reviews and reports monthly to the Office of Management and Budget (OMB) in the DHS Investment Evaluation, Submission, and Tracking system, and through annual OMB business case submissions, demonstrating effective oversight. As far as addressing future capability needs, on March 20, 2020, CBP OFO CCS NIID and CWMD Requirements Division jointly developed and approved an Operational Requirements Document (ORD) detailing the requirements for the first 216 enhanced RPM systems currently being acquired and deployed. Additionally, CBP and CWMD drafted an ORD for the full recapitalization of the entire fleet of 1,400 RPMs for consideration by the DHS Joint Requirements Council. These activities, as well as other examples of oversight such as a recurring weekly report for NIID Leadership and maintenance personnel identifying "bad acting" RPMs for review and action, a copy of which was provided to OIG during its audit fieldwork (along with other supporting and corroborating documents), are not mentioned in the draft report.

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It is also important to note that the DHS NII ILSP lays out the support requirements and processes which equate to effective oversight for all NII equipment to include RPMs. In addition, RPM condition and state of health are assessed in detail annually through performance measures made during [redacted] calibrations, as well as factors indicating the presence of [redacted] wear or damage are continually monitored by CBP. For example, data is continually analyzed by the CBP OFO CCS NIID Data Analysis Center-Threat Evaluation and Reduction Branch to identify potential maintenance issues with fleet gamma and neutron detectors.

In addition, NROC personnel provide oversight to RPM operations and performance, as the NROC was created to ensure the RPM fleet is continuously monitored for issues. Section 4 of the NROC Charter discussed earlier defines the goal of NROC to "establish a centralized support for maintenance for radiation detection systems, ancillary equipment, monitoring of network operations, and maintenance of network components, to improve support." The NROC Charter also states that NROC is "to ensure 24x7 monitoring and create a collaborative culture that will help OFO and Enterprise Services-Office of Information and Technology drive towards higher system availability and faster recovery times to minimize disruptions in service to customers."

Lastly, DHS has serious concerns that the OIG continues to include a number of statements in the draft report that CBP requested the OIG redact. If not redacted, or rephrased to otherwise address CBP's sensitivity concerns, public disclosure of this information in the OIG's final report will reveal law enforcement sensitive information and procedures which could be exploited by our nation's adversaries to circumvent the systems CBP has in place that are critical to national security.

The draft report contained two recommendations, with which DHS concurs. Attached find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, sensitivity, and other issues under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions.

Attachment

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Attachment: Management Response to Recommendations Contained in 20-049-AUD-CBP

OIG recommended that CBP OFO:

Recommendation 1: Ensure CBP ports of entry:

- update standard operating procedures [SOP] by including mandatory operational checks of RPM systems and guidance (directions) on what to do when RPM systems are identified as inoperable; and
- conduct mandatory operational checks of RPM systems in accordance with updated guidance.

Response: Concur. On January 15, 2021, CBP OFO distributed a memorandum to the Directors of Field Offices titled, "[redacted]" and distributed an associated muster memorandum to be used for a Weekly Muster for CBP Officers on January 22, 2021, which served to inform the CBP Field Offices personnel of:

- requirements and [redacted] to be added to local SOPs; and,
- requirements for mandatory RPM function testing, including instruction and recourse if assistance is required.

On February 4, 2022, CBP provided the OIG copies of these documents. We request that the OIG consider this recommendation resolved and closed, as implemented.

OIG recommended that CBP and CWMD key stakeholders:

Recommendation 2: Develop an agreed to support plan to monitor and sustain RPM systems that includes:

- An assessment of RPM panel condition; and,
- Operational Analysis to assess RPM system performance and operations to identify evolving requirements and future capability needs, and changes to sustainment approach.

Response: Concur. CBP OFO, in consultation with CWMD SSD and other key stakeholders, as appropriate, will develop a plan to ensure that RPM system performance is monitored, and that there is clarity for conducting operational assessments of the

deployed fleet to determine panel efficacy and RPM system performance and operations to identify evolving requirements and future capability needs, as well as changes to the sustainment approach. CBP OFO will update the NIID Program Execution Plan, as necessary. Estimated Completion Date: June 30, 2022.

Appendix B
Report Distribution

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