

Conditions at CBP's Forward Operating Bases along the Southwest Border

(Redacted)





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DHS OIG HIGHLIGHTS

Conditions at CBP's Forward Operating Bases along the Southwest Border

February 8, 2016

Why We Did This Inspection

To sustain border security, U.S. Customs and Border Protection (CBP) has established permanent facilities in forward or remote locations, called Forward Operating Bases. We determined whether Forward Operating Bases provide adequate living conditions, security, and safety for employees.

What We Recommend

We made six recommendations, including that CBP address the future of one Forward Operating Base and ensure it conducts required inspections of Forward Operating Bases.

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

Of the seven Forward Operating Bases we inspected along the southwest border, six have adequate living conditions. One Forward Operating Base has security issues, safety and health concerns, and inadequate living conditions. At the other six Forward Operating Bases, we identified security issues, such as inoperable security cameras, as well as an ongoing challenge to provide safe drinking water. In addition, we determined that CBP is not performing all required Forward Operating Base inspections or adequately documenting maintenance and repairs. Without regular inspections and timely maintenance and repairs, CBP cannot ensure it will continue to provide adequate security, safety, and living conditions for its personnel working at these remote facilities.

CBP Response

CBP concurred with our recommendations and is taking steps to address them. Based on CBP's response to our draft report, we closed one recommendation. We consider two recommendations unresolved and the remaining three recommendations resolved and open.



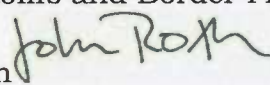
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Department of Homeland Security

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

February 8, 2016

MEMORANDUM FOR: The Honorable R. Gil Kerlikowske
Commissioner
U.S. Customs and Border Protection

FROM: John Roth 
Inspector General

SUBJECT: *Conditions at CBP's Forward Operating Bases along the Southwest Border*

Attached for your information is our final report, *Conditions at CBP's Forward Operating Bases along the Southwest Border*. We incorporated the formal comments from U.S. Customs and Border Protection in the final report.

The report contains six recommendations aimed at enhancing CBP's effectiveness. CBP concurred with all six recommendations. Based on information provided in response to the draft report, we closed recommendation 4. We consider recommendations 1 and 5 unresolved, and recommendations 2, 3, and 6 resolved and open. As prescribed by *Department of Homeland Security Directive 077-01, Follow-Up and Resolution for Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your corrective action plan and target completion dates for the recommendations. Please include responsible parties and any other supporting documentation necessary to inform us about the current status of each recommendation. Until your response is received and evaluated, the recommendations will be considered open and resolved or unresolved. Once your office has fully implemented the recommendation, 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. Please send your response or closure request to OIGInspectionsFollowup@oig.dhs.gov.

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



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Please call me with any questions, or your staff may contact Anne L. Richards, Assistant Inspector General for Inspections and Evaluations, at (202) 254-4100.

Attachment



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Abbreviations

BIA	Bureau of Indian Affairs
CBP	U.S. Customs and Border Protection
CCTV	closed circuit television
FY	fiscal year
FM&E	Facilities Management and Engineering
FOB	Forward Operating Base
IA	Office of Internal Affairs
OIG	Office of Inspector General
OSH	Occupational Safety and Health Division



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Background

Forward Operating Bases (FOBs) are permanent facilities established in forward or remote locations to sustain Border Patrol operations. The primary function of these facilities is to give the Border Patrol a tactical advantage by reducing response time to threats or actionable intelligence. In addition, FOBs are intended to increase security awareness and presence in the border areas where they are located.

According to U.S. Customs and Border Protection (CBP), FOBs increase the time-on-task of personnel operating out of the FOB and provide a sustained enforcement presence and deterrence posture in the border area. FOBs are part of the Border Patrol's layered enforcement strategy and augment other enforcement actions, such as interior patrols, line watch patrols, roving patrols, and checkpoints.

CBP has 15 FOBs in various locations including on CBP-owned land, private land, national parks, and a Native American reservation. Eleven FOBs are located on the southwest border and four are located on the northern U.S. border. At the time of our review, 3 of 11 FOBs on the southwest border were not operational. We visited seven FOBs in the El Paso, Rio Grande Valley, and Tucson Sectors. Six of the FOBs we visited were operational. See appendix C.

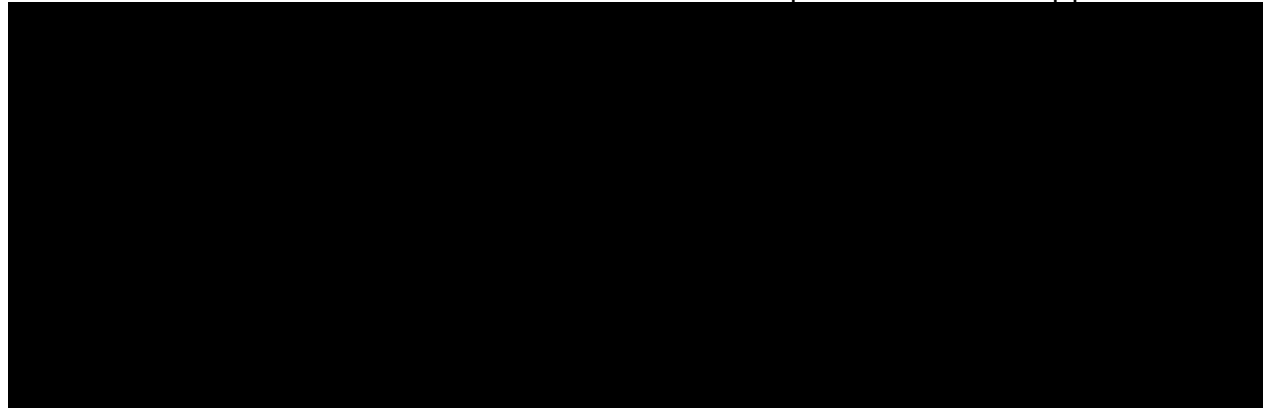


Figure 1: FOB [redacted]
Source: Office of Inspector General (OIG) photo

FOBs are staffed by Border Patrol agents on temporary duty assignments from their permanent duty station. Typically, agents are assigned to a FOB for 7 days, during which they reside at the FOB and deploy to their assigned duties, usually working an 8-hour shift each day. After their shift, they are normally required to remain at the FOB to rest, prepare for their next shift, and be available, if needed, to respond to operational issues. According to a 2010 CBP memo setting forth basic requirements for FOBs, they must be equipped with



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sleeping quarters; showers and restrooms; a full kitchen; a common area with television; and a fitness room.

The Border Patrol and CBP's Facilities Management and Engineering (FM&E) share responsibility for maintaining and repairing FOBs. The Border Patrol identifies issues that need repair and submits a work order to FM&E. FM&E is then responsible for performing maintenance or completing the necessary repair. We did not review FM&E's methods for prioritizing and carrying out maintenance and repairs.

To determine whether CBP is providing adequate living conditions, security, and safety for CBP employees at FOBs, we used CBP's criteria for basic FOB requirements and CBP's directives for security and safety. Throughout this report, we define security issues as those issues pertaining to the physical security of the FOB itself, such as security cameras and perimeter fencing; safety issues are those pertaining to the health and well-being of personnel assigned to the FOB, such as safe drinking water.

Results of Inspection

Of the seven FOBs we inspected along the southwest border, six have adequate living conditions. One FOB has security issues, safety and health concerns, and inadequate living conditions. At the other six FOBs, we identified security issues, including inoperable security cameras, as well as an ongoing challenge to provide safe drinking water. In addition, we determined that CBP is not performing all required FOB inspections or adequately documenting maintenance and repairs. Without regular inspections and timely maintenance and repairs, CBP cannot ensure it will continue to provide adequate security, safety, and living conditions for its personnel working at remote facilities.

Issues at FOB [REDACTED]

One of the Tucson Sector FOBs we visited, [REDACTED], has inadequate living conditions, as well as security issues and safety and health concerns. Consequently, CBP should make renovating the FOB a priority or consider closing it. In evaluating its options for [REDACTED] CBP should take into account whether the access road to the facility can be repaired and properly maintained.



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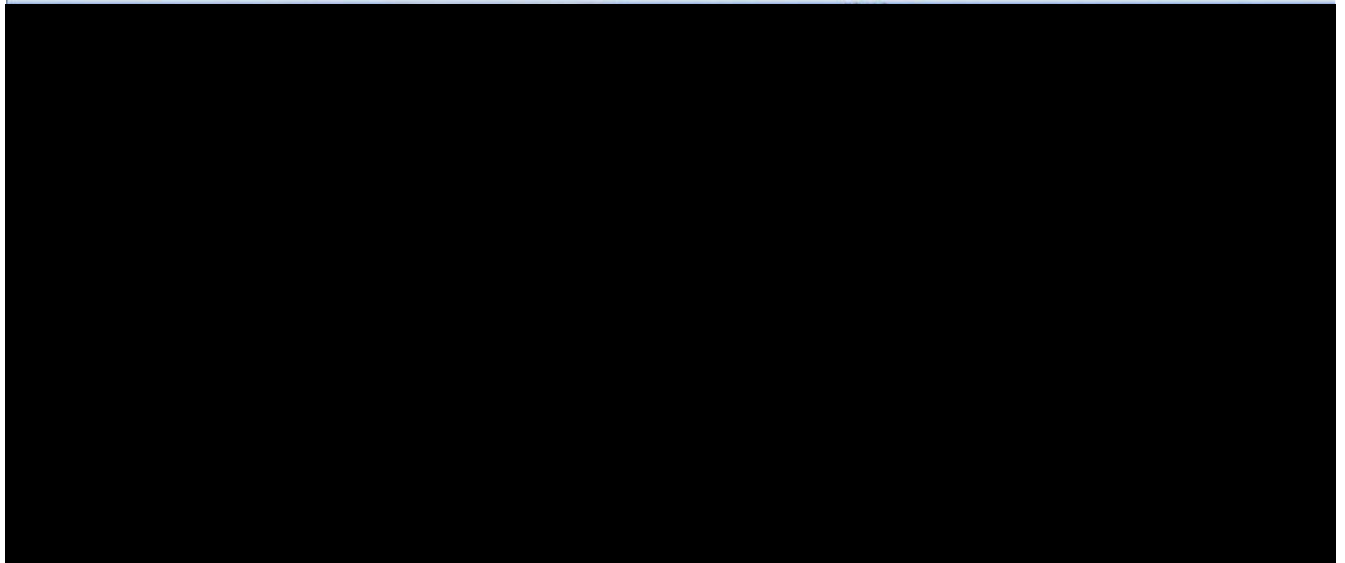


Figure 2: FOB [REDACTED] in Tucson Sector

Source: OIG photo

Living Conditions

FOB [REDACTED] does not provide adequate living conditions. A 2010 memorandum from the Chief of the Border Patrol lists the basic FOB requirements, such as a kitchen and eating area, a break room, and a fitness room. Because [REDACTED] eating area, break area, work area, and fitness room are combined, on-duty agents work at a desk next to off-duty agents exercising, eating meals, and watching television. Off-duty agents eat meals next to any off-duty agents exercising. The 2010 memo does not specify that these areas be separate, but at all the other FOBs we visited, the exercise equipment was in a room separate from the eating area. Additionally, although [REDACTED] has a separate kitchen, there is only one stove [REDACTED].

[REDACTED] has experienced recurring issues with the air conditioning. The air conditioning still functions, but does not always cool the facility properly. From 2012 to 2014, Tucson Sector submitted 10 work orders to FM&E for repairs related to [REDACTED] air conditioning, some of which showed, for instance, that only some rooms were cool. A Tucson Sector official said the air conditioning units are not built to handle the temperatures for that area; they can handle temperatures in the 90s, but not 100 degrees and above. [REDACTED] needs reliable air conditioning because this region experiences extremely high temperatures. One work order documented that the temperature in a [REDACTED] building was above 80 degrees, which exceeds CBP's required indoor comfort conditions for FOBs. When air conditioning units malfunction, [REDACTED] relies on portable air conditioning units.



Security Concerns

██████████ does not have a functioning closed circuit television (CCTV) security camera system, as required by CBP's Office of Internal Affairs' (IA) handbook. According to the handbook, all facilities are to have a functioning CCTV system of cameras, recorders, switches, keyboards, and monitors that record security videos and allow agents on guard duty to monitor the grounds and perimeter of the facility. If agents cannot perform this task, the FOB is more vulnerable to a security breach.

The Tucson Sector initially requested that FM&E fix the security cameras in January 2013. In August 2014, the sector submitted another work order to fix the security cameras because they were still inoperable. The August 2014 work order was marked as a closed work order in October 2014, but at the time of our April 2015 site visit, the security cameras had not been fixed.

Although ██████████ has a perimeter fence to provide physical security as required by CBP IA's handbook, the FOB's perimeter fence entrance gate does not comply with CBP's FOB design standards. ██████████ has a manual gate rather than the controlled-access electronic gate stipulated by these standards. Of the 14 employees we interviewed, 10 noted that the manual gate is repeatedly left open. In fact, when we visited in April 2015, the gate was open. The primary purpose of the perimeter fence is to control access to the FOB. The practice of leaving the gate open increases the likelihood of someone gaining unauthorized access to the FOB. In 2011, Tucson Sector requested funds from CBP to upgrade the manual gate. To date, the gate has not been upgraded to an electronic access gate.

Safety and Health Concerns

We found several recent or outstanding maintenance issues at ██████████ that pose safety and health concerns. For example, several missing floor tiles in the common area could be a tripping hazard. Tucson Sector submitted work orders for FM&E to replace missing tiles in August 2013 and February 2014, but the tiles have not been replaced. In August of 2013, at the request of the Sector's Health and Safety officials, Tucson Sector submitted a work order for FM&E to seal an entry point in the facility for mice and insects. The work order and FM&E documentation does not show whether this repair was completed. Finally, in September 2013 Border Patrol officials submitted a work order requesting that FM&E mount the sharps (medical waste) disposal container on the wall. The work order and other documentation FM&E provided us do not indicate that this work was completed.



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In 2013, the Occupational Safety and Health Administration received a complaint alleging there were “safety or health hazards” at [REDACTED]. CBP closed the FOB to investigate the allegation but was not able to substantiate it. In response to this complaint, Tucson Sector inspected the FOB and found other safety and health concerns, such as expired fire extinguishers and an unclean facility. One Tucson Sector official informed us [REDACTED] is cleaned daily because of heavy agent use, but during our April 2015 site visit, we observed unclean areas indoors. We also heard complaints about the facility’s cleanliness from 7 of the 14 Border Patrol agents we interviewed at the FOB.

[REDACTED] well water is not safe, making the task of supplying water to the FOB more challenging. According to one Tucson Sector official, CBP currently pays a contractor about \$2,000 per week to deliver water via truck to the FOB. FM&E allocated funding to re-drill the well in fiscal year 2015 but has not started the project.

Facility Renovation or Replacement

CBP acknowledges the facility is outdated and wants to rebuild it, but the availability of funds, competing priorities, and negotiations with the Bureau of Indian Affairs (BIA) and [REDACTED] affect its efforts. In 2013, Tucson Sector proposed expanding and renovating [REDACTED] and another FOB. The proposed renovations include bringing the facility up to the basic FOB standards previously mentioned and adding an electronic gate. The other FOB has been renovated, but CBP has not allocated funding to renovate [REDACTED]

Access Road

Traveling to [REDACTED] is treacherous because the primary access road to the FOB is unsafe and deteriorating. Large portions of the road have washed away completely; other parts are impassible because of craters in the road. During our April 2015 site visit, we observed the access road’s poor condition, including the large potholes and nearly unusable portions. Driving on this road, even at reduced speeds, is jarring and potentially hazardous. One Tucson Sector official described the road as “practically impassable.” Additionally, of 14 agents we interviewed, 8 said they view the road as a safety concern.



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Figure 3: Potholes in [REDACTED] access road

Source: OIG photo

BIA, not CBP, owns this road and is therefore responsible for its maintenance and repair. CBP is attempting to negotiate with BIA about the repair, maintenance, and liability of this road, but it has not made much progress.

The future sustainability of [REDACTED] is tied to the condition of its access road. Not only is the road a safety issue for Border Patrol agents traveling to or from the FOB, it is also essential for resupplying and maintaining the facility, including delivering water. Given the road's importance, CBP should consider its repair and maintenance when planning for any major repair or renovation of the facility.

Security Issues at the FOBs

We identified three security concerns at the FOBs we visited. First, not every FOB has operable CCTV security cameras. Second, most FOBs do not have sufficient access controls. Finally, CBP does not consistently conduct security inspections.



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CCTV Security Cameras

Of the six FOBs we visited that have security cameras, four had one or more that were inoperable. For example, a CCTV camera at FOB [REDACTED] broke in August 2014 after a Border Patrol agent backed his car into the pole it was mounted on. A work order was submitted that same month, but as of the time of our April 2015 site visit, the camera had not been repaired.

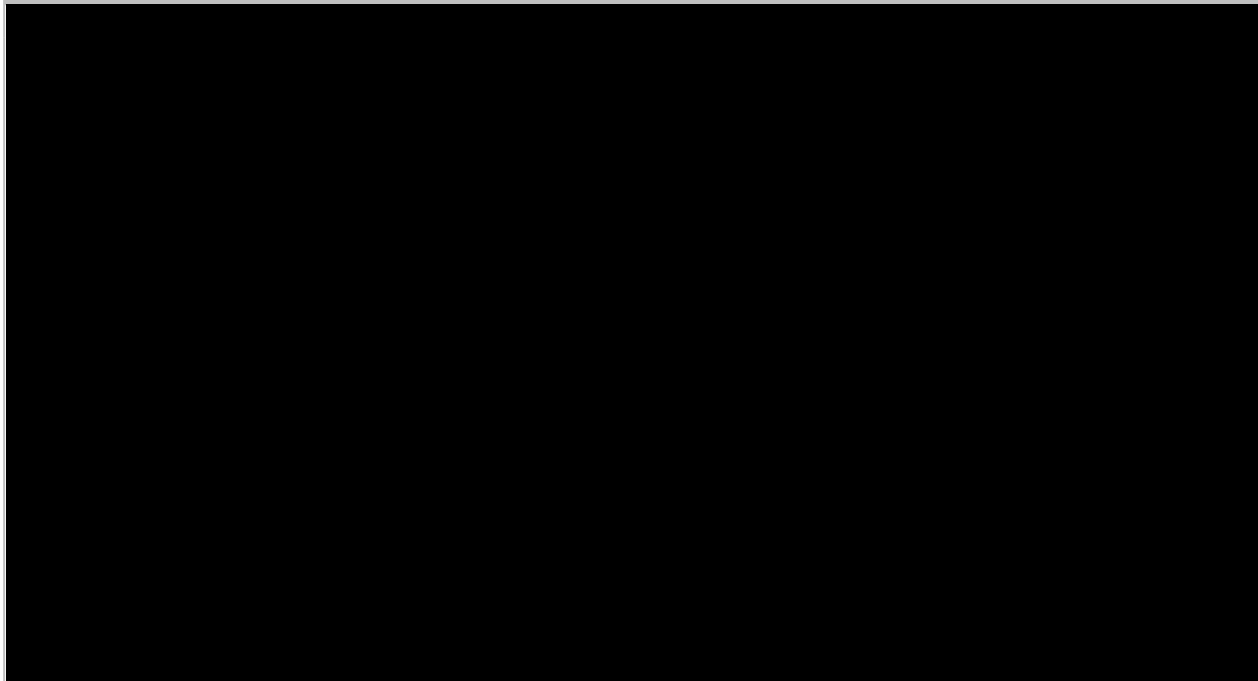


Figure 4: Damaged and inoperable camera at [REDACTED]

Source: OIG photo

All but two of FOB [REDACTED] security cameras have been inoperable since August 2014, when they were struck by lightning. In February 2015, a work order was submitted; at the time of our April 2015 site visit the cameras were still inoperable. FOB [REDACTED] cameras are operable, but they store recordings on a network video recorder rather than a digital video recorder. This does not comply with either CBP IA's or CBP Office of Information Technology's guidance to use digital recorders (because network recordings are susceptible to hacking). Because of their proximity to the U.S.-Mexico border, it is essential that FOBs are equipped with proper, functioning surveillance equipment to maintain awareness and monitor the FOB grounds and perimeter.



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Perimeter Fences and Controlled Access Electronic Gates

CBP's design standards for FOBs require a perimeter fence and an electronic gate. In addition, CBP IA's handbook requires that all facilities be protected by an 8-foot high, chain link perimeter fence; it also requires that fences have a gate to control access. Locks, guard patrols, fixed guard posts, alarms, CCTV, or a combination of these must protect the gates. In these remote border areas, adequate physical perimeter protection is integral to the security of the facility and its occupants.

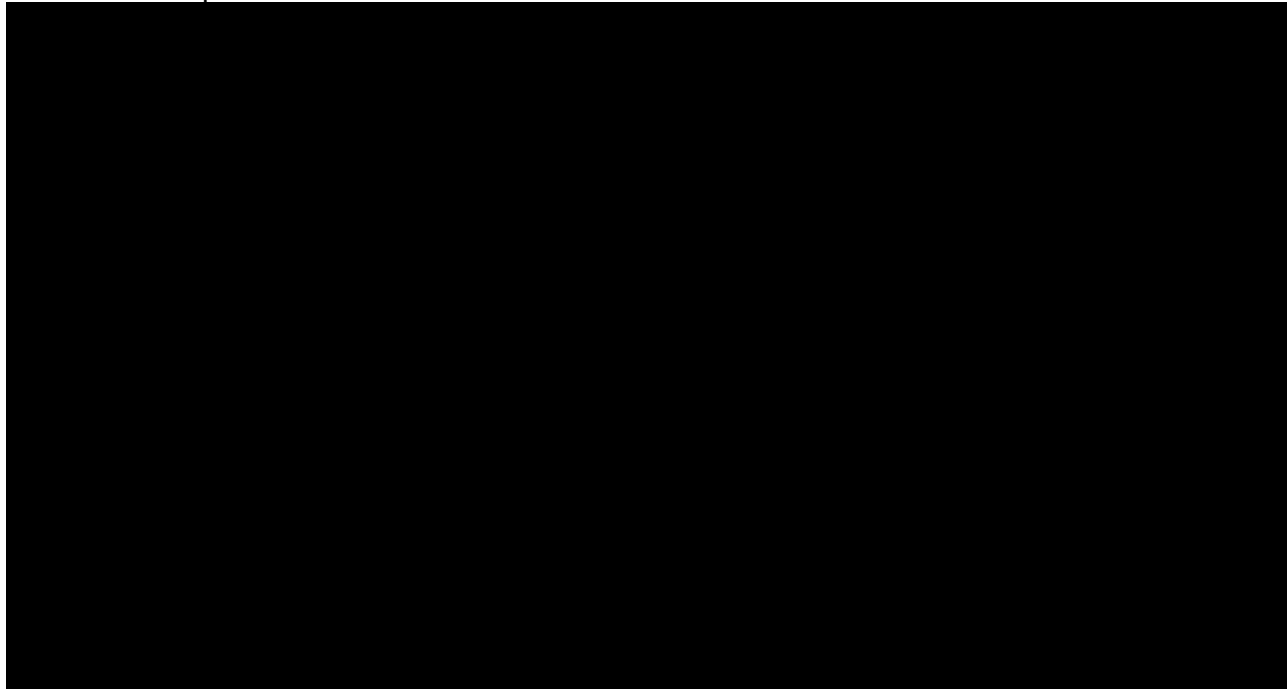


Figure 5: Perimeter fence [redacted] **at FOB** [redacted]

Source: OIG photo

Every FOB we visited, except [redacted] has a perimeter fence. The six FOBs with perimeter fences also have access gates, of which four are electronically controlled and two are manually operated. Like [redacted] the manually operated gate at [redacted] remains unlocked and open. In addition, the electronically controlled gate at [redacted] was unlocked and open during our visit.



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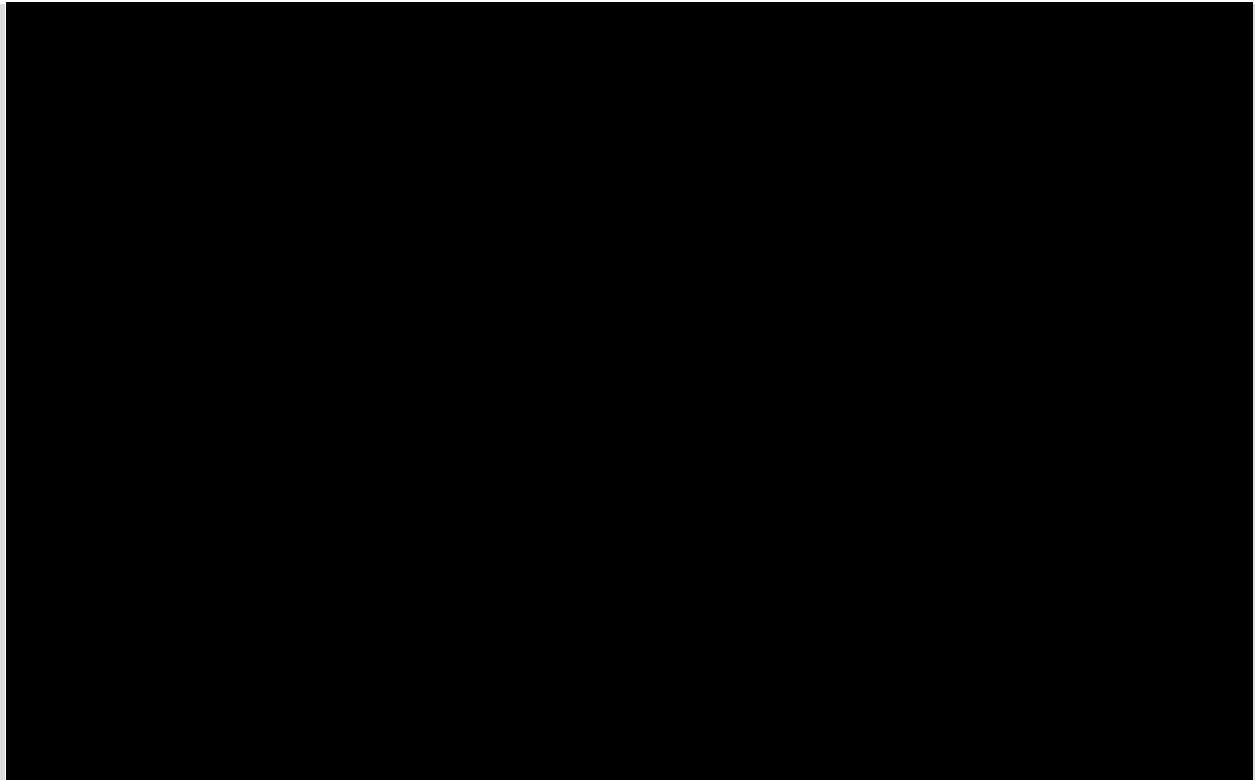


Figure 6: Open manual access gate at FOB

Source: OIG photo

FOB Security Inspections

According to a CBP IA official, IA conducted security inspections at three FOBs in 2013: [REDACTED] CBP IA's handbook stipulates that it will conduct periodic security inspections of all CBP facilities. Officials at IA cited a lack of staff as the reason they have been unable to complete inspections of other FOBs. If IA does not complete security inspections, it may compromise its ability to identify and report potential security weaknesses.

Safety and Health Concerns at the FOBs

We identified two issues related to safety and health conditions at FOBs. First, CBP frequently encounters challenges and expends additional resources to provide safe drinking water at FOBs. Second, CBP does not conduct health and safety inspections consistently at all FOBs in the southwest border region.



Supplying Water to FOBs

Although the challenge of supplying water to FOBs rarely causes CBP to shut down an FOB, it is a frequent problem that often requires additional resources to resolve. As previously mentioned, CBP trucks water to [REDACTED] because its well does not provide safe drinking water. At [REDACTED] which opened in 2013, CBP has had to address high levels of iron in its well water, which causes discoloration. FOB [REDACTED] which also opened in 2013, has experienced water contamination. In addition to potential health and safety issues, the discolored and odorous water might affect the morale of personnel assigned to FOBs.

To improve water quality at [REDACTED] CBP installed a specialized water filtration system. In spite of the new system, agents reported that issues with the color and taste of the water continue. CBP officials certified that the water is safe to drink and provided us with the results of numerous tests it has conducted over the past 2 years. During our April 2015 site visit, we did not observe any discoloration with the drinking water. However, some agents said they do not drink the water, cook with it, do laundry, or even bathe in it because of its taste and discoloration. These issues persist; after our site visit, Tucson Sector asked FM&E to resolve a mineral taste in the hot water at [REDACTED]

FOB [REDACTED] has periodically experienced issues with water contamination. In September 2013, excessive amounts of chlorine were found in the water at the FOB. A month after the high chlorine levels were identified, CBP shut down the FOB for system cleaning. In July 2014, dirt contaminated the water at the FOB. CBP closed the facility for 3 months while it resolved the issue.

We determined CBP officials have been responsive to water issues at the seven FOBs we visited, so we are not making any recommendations at this time. However, it is likely CBP will face continuing challenges supplying and maintaining safe drinking water at FOBs.

FOB Safety and Health Inspections

CBP does not consistently conduct Health and Safety inspections for FOBs on the southwest border. CBP's 2012 *Occupational Safety and Health Handbook* requires all facilities undergo an annual health and safety inspection, including FOBs. Additionally, CBP requires that copies of inspection reports be maintained for 5 years.

We requested annual safety and health inspection reports from 2012 to the present for the FOBs we visited. El Paso Sector officials provided all of the



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requested annual inspections of their FOBs. Neither Rio Grande Valley Sector nor Tucson Sector was able to provide inspection reports for their FOBs, except a 2014 report on [REDACTED] and a 2015 report on [REDACTED]. Although the inspection reports for the El Paso Sector FOBs did not contain any safety or health issues deemed an “imminent danger” to personnel at the FOBs, they did include four “serious” safety and health issues.¹ CBP was slow to correct one of these issues. Although a 2014 safety and health inspection of FOB [REDACTED] identified an ungrounded fuel tank, the tank was not properly grounded until after our February 2015 site visit. In general, CBP took necessary actions to correct the issues identified in these inspection reports.

Without the records of all health and safety inspections, we could not determine whether deficiencies were reported or whether CBP took appropriate actions to address them. Without regular safety and health inspections of FOBs, CBP may be hindering its ability to identify and correct health and safety issues.

Tracking of FOB Maintenance and Repairs

Border Patrol and FM&E share responsibility for maintaining and repairing FOBs. Although CBP personnel reported to us that Border Patrol and FM&E generally complete maintenance and repairs, we could not fully assess these actions or the timeliness of completion because of inconsistent record keeping.

Inadequate Records for Maintenance and Repairs

In response to our request for records from 2012 to the present, neither the Border Patrol nor FM&E could provide complete documentation for all FOBs showing reported maintenance and repair issues, whether they were resolved, and when they were resolved. Without adequate record keeping, CBP cannot be assured that maintenance and repairs are completed in a timely manner in the El Paso and Tucson Sectors.

Border Patrol facilities personnel do not consistently complete work orders to reflect that FM&E fully satisfied the maintenance and repair requests. In 36 of 72 work orders for [REDACTED], the completion of corrective actions was not documented, nor whether corrective actions had been taken at all. Sixteen of 55 work orders for [REDACTED] were incomplete. For [REDACTED], 4 of 93 work

¹ *Customs and Border Protection, Safety and Health Inspection Report* (Handbook 5200-08) classifies each unsafe and unhealthy condition using risk assessment codes ranked from highest to lowest risk—imminent danger, serious, moderate, minor, negligible.



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orders were incomplete, 7 had inconsistent information, and 5 included a completion date prior to receipt of the work order.

Because FM&E does not have a nationwide work order process, FM&E personnel in the El Paso and Tucson Sectors developed their own methods to track requests for FOB maintenance and repairs. In many cases, the Border Patrol and FM&E informally request maintenance and repairs through emails and telephone calls.

Matter for Management Consideration

During our interviews of Border Patrol personnel, agents expressed the need for cell phone coverage and access to the internet for personal use. These agents said that providing cell phone boosters or internet connectivity at the FOBs would improve their morale by allowing them to communicate with friends and family when off duty. To date, CBP has made some effort to address this issue. For example, CBP installed cell phone boosters at [REDACTED] and [REDACTED]. However, some of the FOBs are located in more remote areas where a cell phone booster may not be adequate. CBP has not addressed the issue of internet connectivity. Based on our observations and interviews, we encourage CBP management to consider providing cell phone boosters and/or personal internet connectivity at FOBs.

Recommendations

We recommend that the Commissioner, U.S. Customs and Border Protection:

Recommendation 1 (Revised): Establish a timetable for renovating FOB [REDACTED] or consider closing the facility. Ensure that any decision concerning major repairs or renovation of the facility takes into consideration the need for [REDACTED] to repair and maintain the [REDACTED] access road.

Recommendation 2: Repair or replace surveillance cameras at FOBs [REDACTED]

Recommendation 3: Ensure that FOBs [REDACTED] gates comply with current CBP IA standards.



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Recommendation 4 (Closed): Establish a process to conduct periodic security inspections of the FOBs. Inspections should include assessing whether FOB surveillance cameras are operable.

Recommendation 5: Establish a process to conduct periodic safety and health inspections of all FOBs.

Recommendation 6: Establish a standardized system of record for tracking and reporting on the status of maintenance and repair work orders.

CBP Comments to the Draft Report and OIG Analysis

CBP concurred with all six recommendations and is taking steps to address them. Appendix B contains a copy of CBP's management comments in their entirety. We also received and incorporated technical comments as appropriate. Based on CBP's response to our draft report, we closed Recommendation 4. We consider Recommendations 1 and 5 unresolved. We consider Recommendations 2, 3, and 6 resolved and open.

CBP Response to Recommendation 1: CBP concurred with the recommendation. In its response, CBP stated that the FOB in question is in a critical, active enforcement area for Border Patrol operations and if closed, would be detrimental to the gains the Border Patrol has made addressing and managing risk along this part of the border. CBP also stated that the Border Patrol has prioritized, among its top requirements, a renovation project for [REDACTED], but it is difficult to project a timeline for renovating the FOB due to the current budget climate. In the interim, CBP has completed minor construction projects and is planning to install a new water well and upgrade the command and control room at the FOB. According to CBP, the Border Patrol is committed to continuing to make this project a priority and to expend funds to renovate the FOB once funds are allocated.

CBP noted that the access road to the FOB is on tribal lands and is maintained by BIA, which receives appropriated funds to maintain BIA roads on tribal lands and is responsible for maintaining this road. According to CBP, BIA indicated it does not have sufficient funds to maintain and repair the road. The Border Patrol's Tucson Sector, FM&E, and CBP's Office of Chief Counsel have been working diligently with BIA to seek a legally viable avenue through which CBP could transfer funds to BIA to repair the road. However, CBP said this is not permissible. CBP stated it will continue to coordinate with BIA and keep it



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abreast of any progress related to the repair and maintenance of the road. CBP could not estimate when it expects to implement the recommendation.

OIG Analysis: CBP concurred with the recommendation, but did not provide a timetable for renovating the FOB. Therefore, we consider the recommendation unresolved and open. In its Corrective Action Plan, CBP should update OIG on its prioritization efforts for this project, when it will allocate funds for the project, and its estimated timeline for completing the renovation.

CBP Response to Recommendation 2: CBP concurred with the recommendation. CBP stated it works diligently to ensure that security requirements are met at FOBs. CBP described the current status of the surveillance cameras as follows:

- The security cameras at FOB [REDACTED] have been inoperable since they were struck by lightning last year. CBP has funded the repair effort to bring the cameras back online and FM&E awarded a task to repair the cameras at the end of fiscal year (FY) 2015. CBP expects the cameras to be operational on or before the end of February 2016.
- The cameras at FOB [REDACTED] are operational. The concern with this system is that recordings are stored on a network video recorder rather than a digital video recorder. CBP intends to upgrade the camera recording system and install a new digital video recorder by the third quarter of FY 2016.
- In September 2015, FM&E began evaluating the existing system at FOB [REDACTED] for repair or replacement and is taking steps to ensure the FOB's CCTV system is online and operational as soon as possible. CBP expects to begin work in the fourth quarter of FY 2016.

CBP's estimated completion date for all needed repairs or replacement is December 31, 2016.

OIG Analysis: CBP's ongoing and planned actions are responsive to the recommendation. We consider the recommendation resolved and open. In its Corrective Action Plan and subsequent updates, CBP should update OIG on its progress to complete repairs or installation of new equipment and include relevant supporting documentation.

Agency Response to Recommendation 3: CBP concurred with the recommendation. CBP stated that physical security standards require FOB



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gates be swing style with card access, video camera and intercom, chain link on steel frame, with a 500-cycle per day warranty. Presently, the gates at both FOBs [REDACTED] are swing style chain link on a steel frame. Neither gate currently has video camera and intercom, card access, or a 500-cycle per day warranty. CBP stated it understands the need to bring these gates into compliance and will pursue their replacement in FY 2016. It anticipates completing needed upgrades to both FOBs' gates by September 30, 2016.

OIG Analysis: CBP's planned actions are responsive to the recommendation. We consider the recommendation resolved and open. In its Corrective Action Plan and subsequent updates, CBP should inform OIG of its progress in completing upgrades to both FOBs' gates.

CBP Response to Recommendation 4:

CBP concurred with the recommendation. CBP stated that its Office of Internal Affairs' Security Management Division has a security inspection process, but acknowledged that a manpower shortfall is preventing inspections of approximately 1,200 facilities with the frequency required by DHS/Interagency Security Committee Standards. Through a Security Liaison Directive, the Security Management Division initiated an action for each facility to designate, as a collateral duty, a security point of contact. The Commissioner approved the initiative on August 31, 2015. This initiative enables the Security Management Division to provide comprehensive oversight through inspection checklist taskers distributed periodically to facility Security Liaisons. These checklists include questions, derived from Security Specialist checklists used during Physical Security Vulnerability Assessments, about the operating condition of gates, alarms, and surveillance systems, among other security items. CBP requested that OIG consider this recommendation resolved and closed.

OIG Analysis: We reviewed the recently approved Security Liaison Directive, which establishes standards, assigns responsibilities, and directs the implementation and use of CBP personnel to support CBP's internal security activities. The program meets the intent of our recommendation. We consider the recommendation resolved and closed.

CBP Response to Recommendation 5: CBP concurred with the recommendation. CBP stated that the Office of Human Resources Management's Occupational Safety and Health Division (OSH) has a system for inspecting all facilities used or occupied by CBP employees. CBP stated that



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safety specialists inspect facilities in coordination with facility management officials. CBP acknowledged that OSH did not perform regular inspections because it was not aware of either the existence or occupation of FOBs in their respective areas. CBP stated that OSH and Border Patrol are collaborating to improve that awareness. According to CBP, OIG reported safety and health concerns were provided to management and in most cases were addressed, indicating that facilities were being inspected. CBP requested that OIG consider this recommendation resolved and closed.

OIG Analysis: We consider this recommendation unresolved and open. CBP partially satisfied the intent of the recommendation. We agree that the CBP *Occupational Safety and Health Handbook* provides guidance for executing safety and health inspections. However, in addition to the miscommunication between OSH and the Border Patrol, the best evidence that CBP is carrying out the inspection process is being able to produce the inspection reports themselves, which CBP could not do in some instances. To enable us to close the recommendation, in its Corrective Action Plan CBP should provide evidence of the steps OSH and the Border Patrol are taking and when they expect to complete those steps, to ensure frequent and effective inspections occur and are documented.

CBP Response to Recommendation 6: CBP concurred with the recommendation. CBP stated that FM&E is aware of the problems inherent in using different systems across the various Border Patrol sectors to track maintenance and repair work orders and is working to standardize the tracking and reporting of these tasks. Recently, CBP piloted a real property system called TRIRIGA in three sectors to track the progress of work orders in a centralized system that both Border Patrol and FM&E can access. TRIRIGA gives FM&E an enterprise-level solution to monitor actions from request through closeout. CBP stated that FM&E plans to roll out TRIRIGA to all remaining Border Patrol sectors starting in early 2016, once the pilot is completed. CBP estimates that by August 2017 all sectors will be using the new system.

OIG Analysis: As described by CBP, TRIRIGA should enable CBP and FM&E to track maintenance and repair work orders more effectively. We consider the recommendation resolved and open, pending completion of the pilot effort. In its Corrective Action Plan, CBP should update OIG on the pilot's progress and plans to implement TRIRIGA.



Appendix A

Objective, Scope, and Methodology

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

This report provides the results of our work to determine whether FOBs provide adequate living conditions, security, and safety for CBP employees.

To conduct this work, we reviewed CBP's national and local regulations, policies, and procedures pertaining to FOBs. We reviewed prior OIG and U.S. Government Accountability Office reports. We queried the OIG hotline and CBP IA for information on complaints received. We conducted interviews with officials from CBP's Office of Border Patrol and FM&E. We reviewed maintenance work orders and work order tracking logs specific to the FOBs.

We visited three Border Patrol sector headquarters, six Border Patrol stations, and seven FOBs. At the sector headquarters and stations, we interviewed management officials about operation and maintenance of the FOBs. While at the stations, we also interviewed Border Patrol agents who had been assigned to FOBs. At the FOBs, we visually inspected the general state of living conditions, security, and safety.

We met with officials from the National Border Patrol Council, the union that represents Border Patrol agents throughout the country, regarding concerns it had raised about the FOBs. However, a number of the issues that they raised during these meetings were outside the scope of our review.

We conducted this inspection between November 2014 and April 2015 under the authority of the *Inspector General Act of 1978*, as amended, and according to the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.



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Appendix B CBP Comments to the Draft Report


1300 Pennsylvania Avenue NW
Washington, DC 20229

OCT 19 2015



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

MEMORANDUM FOR: Anne L. Richards
Assistant Inspector General
Office of Inspections and Evaluations

FROM: Sean M. Mildrew 
Chief Accountability Officer

SUBJECT: Management's Response to OIG Draft Report, "Conditions at
CBP's Forward Operating Bases along the Southwest Border"
(Project No. 14-017-ISP-CBP)

Thank you for the opportunity to review and comment on this draft report. U.S. Customs and Border Protection (CBP) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

As America's frontline border Agency, CBP's priority mission is to protect the American public, while facilitating lawful travel and trade. To do this, CBP has deployed a multi-layered, risk-based approach to enhance the security of our borders while facilitating the flow of lawful people and goods entering the United States. This layered approach to security reduces our reliance on any single point or program that could be compromised. It also extends our zone of security outward, ensuring that our physical border is not the first or last line of defense, but one of many." Forward Operating Bases (FOBs) are a critical facet of U.S. Border Patrol (USBP or the Border Patrol) operations which give the Border Patrol a tactical advantage by (1) providing close support in areas that are remote and otherwise difficult to patrol; (2) reducing the amount of time and fuel required to drive to and from the border area; and (3) providing a sustained enforcement presence and deterrence posture in the border area. FOBs are a critical part of the USBP Strategic Plan in that they provide greater operational capability in areas where gaps exist in deployment density and infrastructure.

The draft report contained six recommendations with which CBP concurs. Specifically, the OIG recommended that the CBP Commissioner:

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Recommendation 1: Establish a timetable for renovating FOB [REDACTED] or consider closing the facility. Ensure that any decision concerning major repairs or renovation of the facility takes into consideration the need to repair and maintain the [REDACTED] access road.

Response: Concur. The [REDACTED] FOB is in a critical enforcement area for USBP operations on [REDACTED] in the west Arizona desert. This area is very active in illegal cross border activity involving aliens and narcotics. Closing operations at the [REDACTED] FOB cannot be considered an option because closing the FOB would be detrimental to the gains the Border Patrol has made at addressing and managing risk along this active part of the border. This FOB also serves as a joint operations center [REDACTED] [REDACTED] thus providing support to our law enforcement partners and serving to help the integration and cooperation between USBP and [REDACTED]

For these reasons, USBP has prioritized, among its top requirements, a renovation project for the [REDACTED] FOB. Currently, it is difficult to project a timeline for the renovation of the FOB due to current budget climate. In the interim, minor construction projects have taken place such as a new septic field and projects are planned for a new water well and an upgrade to the command and control room at the FOB. USBP is committed to continuing to make this project a priority and to expend funds to renovate the [REDACTED] FOB once funds are allocated.

Federal Route [REDACTED] is on [REDACTED] tribal lands and maintained by the Bureau of Indian Affairs (BIA). The BIA has acknowledged that it is responsible for the maintenance of this road and that it receives appropriations from Congress to maintain BIA roads on tribal lands. However, during multiple discussions, BIA has indicated that it does not have sufficient appropriated funds to maintain and repair [REDACTED]. The USBP's Tucson Sector, CBP's Facilities Maintenance and Engineering Division, and CBP's Office of Chief Counsel have been working diligently with BIA to seek a legally viable avenue through which CBP's appropriated funds can be transferred to BIA and used for the repair of [REDACTED]. However, because Congress provides BIA with an appropriation for the maintenance and repair of Federal roads on tribal land, such as [REDACTED] CBP is not permitted to use its appropriated funds for the maintenance of [REDACTED]. Mindful of this limitation, CBP will continue to coordinate with BIA and keep them abreast of any progress related to the repair and maintenance of [REDACTED]. Estimated Completion Date (ECD): To Be Determined.

Recommendation 2: Establish a process to conduct periodic security inspections of the FOBs. Inspections should include assessing whether FOB surveillance cameras are operable.

Response: Concur. The Office of Internal Affairs, Security Management Division (IA/SMD), has a security inspection process currently in place; however, as reported, a manpower shortfall precludes IA/SMD from conducting inspections of approximately 1,200 facilities with the frequency demanded by DHS/Interagency Security Committee Standards. As a result, facility inspections are prioritized by criticality and mission. To alleviate this deficiency, IA/SMD has initiated an action for each facility to designate, on a collateral duty basis, a security point of

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contact via the Security Liaison Directive. This initiative, recently approved by the Commissioner on August 31, 2015, enables IA/SMD to provide comprehensive oversight via inspection checklist taskers distributed to the facility's Security Liaison on a periodic basis. These checklists contain questions, derived from the Security Specialist Checklists used during Physical Security Vulnerability Assessments include questions such as the operating condition of gates, alarms, and surveillance systems, among other security items.

CBP requests that the OIG consider this recommendation resolved and closed.

Recommendation 3: Repair or replace surveillance cameras at FOBs [REDACTED]
[REDACTED]

Response: Concur. CBP works diligently to ensure that security requirements are met at all of our facilities, including our FOBs. Below is the current status for the surveillance cameras at FOBs [REDACTED].

[REDACTED]
The security cameras at [REDACTED] FOB have been inoperable since they were struck by lightning last year. CBP has funded the repair effort to bring the cameras back online and a task order has been awarded under Facilities Management & Engineering's (FM&E) [REDACTED] Preventative Maintenance Contract. The task order to repair the cameras was awarded the end of Fiscal Year 2015 and are expected to once again be operational on or before the end of November 2015.

[REDACTED]
The recommendation requests that we repair or replace surveillance cameras at the FOBs [REDACTED]. However, the cameras at FOB [REDACTED] are operational. The concern with this system is that recordings are stored on a network video recorder rather than a digital video recorder. CBP intends to upgrade the storage mechanism at FOB [REDACTED] in Fiscal Year (FY) 2016. Our current plan of action and milestones is as follows:

- FY 2016 Quarter (Q) 1 – Define requirements and develop Statement of Work, Independent Government Cost Estimate and acquisition strategy.
- FY 2016 Q2 – Complete acquisition and award the work.
- FY 2016 Q3 – Complete the installation of the new digital video recorder at FOB [REDACTED]

[REDACTED]
The week of September 7, 2015, FM&E began evaluating the existing system at [REDACTED] for repair or replacement and is in the process of developing a Statement of Work, Independent Government Cost Estimate and acquisition strategy for pursuing the needed work to ensure the FOB's CCTV system is online and operational as soon as possible. Our current plan of action and milestones is as follows:



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- FY 2015 Q4 & FY 2016 Q1 – Define requirements and develop Statement of Work, Independent Government Cost Estimate and acquisition strategy.
- FY 2016 Q2 & Q3 – Complete acquisition and award the work.
- FY 2016 Q4 – Begin work on the CCTV system at FOB [REDACTED]

ECD: December 31, 2016.

Recommendation 4: Ensure that FOBs [REDACTED] gates comply with current CBP IA standards.

Response: Concur. The CBP IA physical security standard for gates at FOBs states that gates must be swing style with card access, video camera and intercom, chain link on steel frame, with a 500 cycle per day warranty. Presently, the gates at both FOBs [REDACTED] are swing style chain link on a steel frame. Neither gate currently has video camera & intercom, card access nor a 500-cycle per day warranty. CBP understands and appreciates the need to bring these gates into compliance and will pursue their replacement in FY 2016. Our estimated plan of action and milestones is as follows:

- FY 2015 Q1 – Define requirements and develop Statement of Work, Independent Government Cost Estimate and acquisition strategy.
- FY 2016 Q2 & Q3 – Complete acquisition and award the work.
- FY 2016 Q4 – Complete upgrades to the gates at FOBs [REDACTED]

ECD: September 30, 2016.

Recommendation 5: Establish a process to conduct periodic safety and health inspections of all FOBs.

Response: Concur. Per the CBP Occupational Safety and Health Handbook (HB 5200-08B), the Human Resources Management (HRM), Occupational Safety and Health (OSH) Division has a system in place for inspecting all facilities used or occupied by CBP employees. It should be noted, however, that the OSH Division safety specialists inspect facilities in coordination with the facility's management official(s). In the case of the FOBs, regular inspections were not always performed because the OSH Division was not aware of either the existence or occupation of FOBs in their respective areas. The HRM, OSH Division and the USBP have been collaborating to improve communications in regard to FOBs being established so that these operations can be frequently and effectively inspected. Note that the report states repeatedly that information about safety and health concerns was provided to management and that in most cases the concerns were addressed, which indicates that the facilities were being inspected.

CBP requests that the OIG consider this recommendation resolved and closed.



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Recommendation 6: Establish a standardized system of record for tracking and reporting on the status of maintenance and repair work orders.

Response: Concur. FM&E is aware of the problems inherent in using different systems across the various Border Patrol sectors to track maintenance and repair work orders, and is working diligently to standardize the tracking and reporting of these tasks. To that end, the organization recently began using the International Business Machines' (IBM) TRIRIGA², its real property system of record, to track work orders in a centralized system that both Border Patrol and FM&E can access to track the progress of the work requests. The TRIRIGA task management system allows FM&E an enterprise-level solution to manage and view all work in effort to sustain CBP's facilities.

In April to June 2015, FM&E rolled out the TRIRIGA "Tasks" feature to three sectors as a pilot project: El Centro, Tucson, and Houlton. This feature allows Border Patrol Agents to submit work orders through one centralized system so they can be processed and remediated by FM&E staff. The "Tasks" follow actions from request through closeout and are assigned and monitored by FM&E facility and maintenance supervisory staff. FM&E plans to roll TRIRIGA task management out to all remaining Border Patrol sectors starting in early 2016 once the pilot is complete and all lessons learned are captured and implemented in the system and training guides.

The planned schedule is listed below for nationwide roll-out:

Description	Sector(s)	Planned Timeframe
Data loads, training, follow-through	Laredo, Del Rio	January 2016 – March 2016
	Rio Grande Valley	April 2016 – May 2016
	Buffalo, Swanton, New Orleans, Miami, Ramey	June 2016 – August 2016
	El Paso, Big Bend	September 2016 – November 2016
	San Diego, Yuma	December 2016 – February 2017
	Blaine, Spokane	March 2017 – May 2017
	Detroit, Grand Forks	June 2017 – August 2017

ECD: August 30, 2017

Again, thank you for the opportunity to comment on this draft report. Technical comments were previously provided under separate cover. If you have any questions, or require any additional information, please feel free to contact me at (202) 344-1992, or have a member of your staff contact Ms. Lynn Richardson, CBP Audit Liaison, Management Inspections Division at (202) 325-7731. We look forward to working with you in the future.

² TRIRIGA is not an acronym. TRIRIGA is an IBM product for real property lifecycle management.



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Appendix C
OIG Site Visits to Forward Operating Bases

FOB	Sector	Year Opened	Operational: Y/N
	El Paso	2013	Yes
	El Paso	2012	Yes
	El Paso	2009	Yes
	Rio Grande Valley	2011	No
	Tucson	2012	Yes
	Tucson	2013	Yes
	Tucson	2006	Yes

Source: OIG

*We conducted all of our site visits in 2015.



Appendix D

Office of Inspections Major Contributors to This Report

William McCarron, Chief Inspector
Wayne Ekblad, Supervisory Inspector
Kimberley Crabbe, Inspector
Adam Brown, Inspector
Brianna Cumana, Inspector
Ryan Cassidy, Inspector
Kelly Herberger, Communications Analyst



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Appendix E

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Office of Inspector General, Mail Stop 0305
Attention: Hotline
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Washington, DC 20528-0305