

**CBP's Management of  
International Mail  
Facilities Puts Officer  
Safety and Mission  
Requirements at Risk**





**OFFICE OF INSPECTOR GENERAL**  
Department of Homeland Security

Washington, DC 20528 / [www.oig.dhs.gov](http://www.oig.dhs.gov)

August 31, 2023

MEMORANDUM FOR: Troy A. Miller  
Senior Official Performing the Duties of the  
Commissioner  
U.S. Customs and Border Protection

FROM: Joseph V. Cuffari, Ph.D.     **JOSEPH V**  
Inspector General                     **CUFFARI**

SUBJECT:                     *CBP's Management of International Mail Facilities Puts  
Officer Safety and Mission Requirements at Risk*

Digitally signed by  
JOSEPH V CUFFARI  
Date: 2023.08.31  
09:08:20 -04'00'

Attached for your action is our final report, *CBP's Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk*. We incorporated the formal comments provided by your office.

The report contains three recommendations aimed at improving CBP's management of international mail facilities. Your office concurred with the three recommendations.

Based on information provided in your response to the draft report, we consider recommendations 1 through 3 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts.

Please send your response or closure request to  
[OIGAuditsFollowup@oig.dhs.gov](mailto:OIGAuditsFollowup@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 the report on our website for public dissemination.

Please contact me with any questions, or your staff may contact Kristen Bernard, Acting Deputy Inspector General for Audits, at (202) 981-6000.

Attachment



# DHS OIG HIGHLIGHTS

## *CBP's Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk*

**August 31, 2023**

### **Why We Did This Audit**

CBP plays a critical role in safeguarding the American public by interdicting illegal drugs entering the United States, including through international mail. We conducted this audit to determine whether CBP effectively manages IMF operations and the extent that CBP targets and interdicts inadmissible international mail entering the United States through IMFs. This is the first in a series of reports on IMFs. This report focuses on CBP's management of IMF operations.

### **What We Recommend**

We made three recommendations to improve the safety and management of CBP's IMFs.

**For Further Information:**

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

### **What We Found**

U.S. Customs and Border Protection (CBP) did not effectively manage International Mail Facility (IMF) operations. Specifically, CBP did not ensure prompt resolution of serious issues, including critical maintenance and life safety deficiencies, at six IMFs. Additionally, CBP paid for unusable space at two IMFs. Finally, the San Juan IMF had a lapsed space agreement and operated out of temporary locations for more than 6 years, including a period of time when it operated out of a parking lot.

This occurred because CBP's Office of Facilities and Asset Management did not prioritize resolving and monitoring issues at the IMFs, which may have jeopardized officer safety. CBP also did not effectively renegotiate space agreements and did not identify \$3.2 million in funds that could have been put to better use if not spent on unusable space. Finally, CBP may not have met mission requirements at the San Juan IMF, where officers could only conduct limited mail screening operations.

### **CBP Response**

CBP concurred with all three recommendations, which we consider open and resolved.



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**Abbreviations**

CBP	U.S. Customs and Border Protection
ECD	Estimated Completion Date
GAO	U.S. Government Accountability Office
GSA	General Services Administration
IMF	International Mail Facility
JFK	John F. Kennedy International Airport
OFAM	Office of Facilities and Asset Management
OFO	Office of Field Operations
USPS	U.S. Postal Service





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### Background

Within the Department of Homeland Security, U.S. Customs and Border Protection (CBP) plays a critical role in the Nation's efforts to safeguard the American public by interdicting illegal drugs entering the United States, including through international mail. The U.S. Postal Service (USPS) must present all classes of international mail to CBP at the first port of entry in the United States. This is generally an International Mail Facility (IMF) where officers inspect the mail to identify illegal drugs and other inadmissible items. CBP and USPS have an agreement for inspecting goods arriving via international mail. The agreement also guides facility managers when developing local procedures, ensuring timely flow of mail, and outlining responsibilities for maintaining equipment.

**Figure 1. Conveyor Belt USPS Uses to Route Mail for CBP Screening at Chicago IMF**



Source: DHS Office of Inspector General

During our audit, CBP inspected mail at eight IMFs across the United States and its territories. Before our audit, USPS announced that it would close a ninth IMF in San Francisco in March 2022. The IMFs are located in commercial or USPS-owned buildings, and as shown in Table 1, CBP has different types of agreements for managing the IMF spaces.



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**Table 1. Summary of IMF Locations and Space Agreements**

Facility	Building Owner	Space Agreement
Chicago, IL	USPS	Lease through General Services Administration (GSA)
Honolulu, HI	USPS	Lease through GSA
John F. Kennedy International Airport (JFK), New York, NY	USPS-leased <sup>1</sup>	Sub-Leased through GSA
Newark, NJ	USPS	Lease through GSA
San Juan, Puerto Rico	USPS <sup>2</sup>	Direct Free Space Agreement between CBP and USPS
Los Angeles, CA	Commercial	Lease through GSA
Miami, FL	Commercial	Lease through GSA
St. Thomas, U.S. Virgin Islands	Commercial	Lease through GSA

Source: DHS OIG analysis of CBP occupancy agreements

Key CBP offices that manage IMFs are:

- Office of Field Operations (OFO), which is responsible for border security and facilitating lawful trade at U.S. ports of entry. OFO’s responsibilities include the IMFs, which report to field offices and gather mail from USPS for inspection.
- Office of Facilities and Asset Management (OFAM), which manages CBP’s portfolio of owned and leased real property, including the IMFs. Within OFAM, the Field Operations Facilities Program Management Office provides facility services for OFO, including:
  - management and administration of all leases, including lease renewals, lease alterations, and lease disputes;
  - program managers based at field offices, providing regional, on-the-ground project management support, including reviewing facility assessments; and

<sup>1</sup> USPS leased this space from the Port Authority of New York and New Jersey.

<sup>2</sup> For more information on the San Juan IMF’s lease issues, see page 8 of this report.



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- support and assessment of the condition, function, and overall performance of existing facilities, including leading assessments associated with facility condition and functionality.

DHS issued a directive and two policy documents<sup>3</sup> to guide component management of real property.<sup>4</sup> Together, this guidance requires components to efficiently use available space and dispose of excess real property, manage property to maintain an appropriate level of use, and conduct regular reviews to identify property that is underutilized or does not align with mission or intended use. Beginning in fiscal year 2018, DHS required each component to assess the condition of its real property every 3 years and complete facility assessments.<sup>5</sup>

We conducted this audit to determine whether CBP effectively manages IMF operations and the extent that CBP targets and interdicts inadmissible international mail entering the United States through IMFs. This report addresses CBP's management of IMF operations. We are issuing a separate report addressing the extent that CBP targets and interdicts international mail.

### Results of Audit

CBP did not effectively manage IMF operations. Specifically, CBP did not ensure prompt resolution of serious issues, including critical maintenance and life safety deficiencies, at six IMFs. Additionally, CBP paid for unusable space at two IMFs. Finally, from February 2017 through May 2023, the San Juan IMF had a lapsed space agreement and operated out of temporary locations for more than 6 years, including a period of time when it operated out of a parking lot.

This occurred because OFAM did not prioritize resolving and monitoring issues at the IMFs, which may have jeopardized officer safety. CBP also did not effectively renegotiate space agreements and did not identify \$3.2 million in funds that could have been put to better use if not spent on unusable space. Finally, CBP may not have met mission requirements at the San Juan IMF, where officers could only conduct limited mail screening operations.

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<sup>3</sup> DHS Directive 119-02, Revision Number 00, *Real Property Management Program*, December 10, 2012; DHS Instruction 119-02-001, *Real Property Manual*, July 2010; DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.

<sup>4</sup> Executive Order 13327, dated February 4, 2004, defines Federal real property as any real property owned, leased, or otherwise managed by the Federal Government.

<sup>5</sup> DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018.



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## **CBP Did Not Promptly Resolve Critical and Life Safety Deficiencies and Maintenance Issues**

In facility assessments for its IMFs, CBP documented maintenance issues, including critical and life safety deficiencies, several of which remain unresolved. According to an OFAM official, OFAM does not have guidance defining “critical or life safety” deficiencies in its facilities but, for its contractor, uses a standard that considers fire protection and occupational health and safety issues as life safety or critical.<sup>6</sup> The U.S. Government Accountability Office’s (GAO) *Standards for Internal Control in the Federal Government* requires management to communicate quality information throughout the entity and remediate deficiencies on a timely basis.

Between October 2020 and July 2021, CBP hired a contractor to assess eight IMFs<sup>7</sup> and prepare facility assessment reports. In the reports, the contractor identified facility conditions and deficiencies, including deficiencies listed as “critical or life safety” (see Table 2). Specifically, the contractor:

- rated six of eight IMFs as being in critical condition using a facility condition index;<sup>8</sup>
- described 70 deficiencies at the IMFs; and
- designated 11 of the 70 deficiencies as “critical or life safety” deficiencies, identified as priority 1, “immediate concerns action ASAP” in the reports. For example, the contractor identified two “critical or life safety” deficiencies at IMFs that had electrical and mechanical rooms that were not fully fire resistant or did not have fire resistant doors, while another IMF did not have required fire alarms at an exit door.

The contractor included a planned action date and the entity responsible (CBP, GSA, or USPS) for addressing the critical and life safety deficiencies within a year of the assessment date.

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<sup>6</sup> CBP’s contractor that conducts and reports on facility assessments uses the International Code Council and National Fire Protection Life Safety Code. According to OFAM, CBP considers “any fire protection or the Occupational Safety and Health Administration-required violations as life safety/critical.”

<sup>7</sup> In accordance with DHS Instruction 119-02-004, *Real Property Facility Condition Assessments* (July 2018), CBP must assess the conditions of its IMFs every 3 years. CBP did not evaluate the San Francisco IMF because it was scheduled to close.

<sup>8</sup> The condition index lists four levels: good, fair, poor, and critical. The condition index is calculated using the sum of all deficiency costs divided by the replacement value of the facility, multiplied by 100. The facility condition is considered critical when the result of this calculation (condition index level) is 0-69.





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**Table 2. IMF Assessment Deficiencies and Resolution Status,  
as of April 28, 2023**

<b>IMF</b>	<b>Date of Assessment</b>	<b># Deficiencies</b>	<b># Critical or Life Safety Deficiencies</b>	<b>Unresolved Critical or Life Safety Deficiencies</b>
<b>Chicago</b>	2/23/2021	17	3	1
<b>Honolulu</b>	4/21/2021	12	1	0
<b>JFK</b>	10/20/2020	6	1	1
<b>Los Angeles</b>	2/24/2021	9	2	1
<b>Miami</b>	6/28/2021	4	2	0
<b>Newark</b>	10/22/2020	7	1	1
<b>San Juan</b>	6/30/2021 <sup>9</sup>	11	0	0
<b>U.S. Virgin Islands</b>	7/1/2021	4	1	0

Source: DHS OIG analysis of CBP facility assessments and OFAM responses

We requested that the IMFs provide a status update regarding the 11 identified critical or life safety deficiencies. At the time of our request, 2 of the 11 deficiencies were resolved. As for the remaining nine deficiencies, IMF officials (1) listed them as unresolved, (2) could not provide a status, or (3) referred us to GSA for the status.

We notified OFAM of the potentially unresolved life safety deficiencies at the Chicago IMF on November 29, 2022, and of those critical or life safety deficiencies at the remaining IMFs on March 7, 2023. We urged OFAM to expedite resolution of these nine deficiencies and requested status updates. OFAM provided the resolution status for each of the 11 deficiencies, as shown in Table 2. The four deficiencies that remain unresolved relate to not having emergency backup generators; despite the contractor indicating the issues were life safety concerns, OFAM officials indicated this is a critical, not a life safety, deficiency and that generators will be installed in the future as funding permits.

Although OFAM headquarters was aware of the deficiencies raised in the facility assessment reports, it did not always communicate the results to the

<sup>9</sup> CBP conducted a facility assessment for the San Juan IMF on June 30, 2021, and issued a facility assessment report on September 1, 2021, which listed the facility condition level as “critical.” However, the report was issued after the San Juan IMF building was condemned. For more information on the San Juan IMF’s lease and safety issues, see page 8 of this report.



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IMFs, three of which reported being unaware of the assessments. Additionally, a regional OFAM contractor did not know the status of one critical deficiency in his region and deferred to USPS for information.

In addition to the deficiencies documented in the facility assessments, IMF and GSA officials identified other maintenance issues as early as 2018. At the Chicago IMF, CBP and GSA officials documented and requested resolution for trash blocking CBP's radiation inspection area that prevented access for emergency vehicles, repeat rodent infestations (see Figure 2), and a sink hole in the parking lot that impacted a nearby mobile lab. According to a Chicago IMF official, CBP reported the maintenance issues to USPS and GSA repeatedly. Additionally, at the Newark IMF we observed an area covered with a safety net that had filled with debris (see Figure 3). Newark mission support staff said that there are industry standards for safety features but were unaware if the net met these standards.

**Figures 2 and 3. Chicago IMF Rodent Infestation (left) and Newark IMF Safety Net with Debris (right)**



Source: GSA and DHS OIG

These issues occurred because OFAM did not prioritize monitoring and resolving facility deficiencies and other maintenance issues at the IMFs. According to an OFAM official, OFAM's senior leadership was aware that IMFs had difficulty resolving deficiencies locally and, therefore, conducted the facility assessments in anticipation of meeting with GSA and USPS senior leadership to resolve the deficiencies. However, OFAM confirmed that its senior leaders did not meet with GSA and USPS. In some cases, headquarters OFAM officials were unaware of ongoing maintenance issues at the IMFs. For example, when we presented photos of the large safety net containing debris at the Newark



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IMF, a senior headquarters OFAM official responded that she was unaware of the issue.

### **CBP Paid \$3.2 Million for Unusable Space at the IMFs**

CBP paid a total of \$1.7 million for unusable space at the Newark IMF from 2017 through 2023 and nearly \$1.6 million for unusable space at the Honolulu IMF from 2014 through 2023. According to DHS' *Real Property Manual*, components should manage leases to optimize the cost and terms of Department leasing to meet its needs and budgets.<sup>10</sup> We reported a similar problem with unusable space in a report on the JFK IMF in 2021.<sup>11</sup>

During a visit to the Newark IMF, we observed that 46 percent of CBP's lease space was filled with unused conveyor belts making the space unusable for CBP's operations, such as screening mail. A supervisory CBP officer said CBP has not used the conveyor belts since 2016 due to a change in its operations. We observed layers of dust, rodent droppings and traps, and packages postmarked from 2020 on the belts. Both regional and headquarters OFAM officials were unaware of the unused space at Newark.

At the Honolulu IMF, we observed that 42 percent of the space designated for screening mail was occupied by inoperable conveyor belts. Figures 4 and 5 show sections of unusable space at the Newark and Honolulu IMFs. In 2019, at CBP's request, GSA identified the belts were inoperable and had been since 2013 and requested that USPS remove the belts. Although regional OFAM and GSA officials were aware that USPS would not remove the belts, CBP continued to pay rent for the unused space and renegotiated its space agreements on three occasions after its 2019 letter. See Appendix C for a breakdown of unusable space at the Newark and Honolulu IMFs. See Appendix E for Potential Monetary Benefits.

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<sup>10</sup> DHS Instruction 119-02-001, *Real Property Manual*, July 2010.

<sup>11</sup> OIG-21-27, *CBP Faced Challenges in Its Inspection Processes and Physical Security at the JFK International Mail Facility*, March 12, 2021. The report notes that 28.05 percent of the space CBP was renting was unusable as of June 2019.



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**Figures 4 and 5. Unused and Inoperable Conveyor Belts Occupying Space at the Newark IMF (left) and the Honolulu IMF (right), respectively**



Source: DHS OIG and CBP

These issues occurred because OFAM did not monitor or escalate regional IMF issues. Headquarters OFAM officials stated that they were unaware of the unusable space at the Newark and Honolulu IMFs. Although the unused conveyor belts had resulted in unusable space at the Newark IMF since 2016, regional OFAM contractors reviewed CBP’s footprint with GSA in 2019 during a lease renewal and continued leasing that area. Additionally, a regional OFAM official was aware that Honolulu had broken conveyor belts but did not escalate this issue to headquarters. Although they were onsite or were made aware of issues, regional OFAM officials continued to pay rent for space occupied by unusable and inoperable conveyor belts.

**San Juan IMF Operated Without a Space Agreement**

After CBP’s space agreement for the San Juan IMF building expired in 2017, CBP continued operating out of the building and other temporary locations for more than 6 years without establishing a renewed space agreement. DHS requires components to establish a system of accountability to ensure effective planning, use, and management of real property.<sup>12</sup>

According to a memorandum of agreement between USPS and CBP, USPS rented space in its Hato Rey facility to CBP for the San Juan IMF for a fixed term from March 1, 2012, through February 28, 2017; CBP was to vacate the space at the end of the term. However, after the agreement expired in February 2017, CBP continued to operate the San Juan IMF out of the Hato Rey facility

<sup>12</sup> DHS Directive 119-02, Revision Number 00, *Real Property Management Program*, December 10, 2012.





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for an additional 4 years and 6 months without a renewed space agreement. In August 2021, the Hato Rey facility where the San Juan IMF was located was condemned, and CBP was forced to move its screening operations to the parking lot of a facility known as La Ceramica. Due to environmental and safety concerns, a local San Juan official halted CBP operations in the parking lot in May 2022, and the IMF moved into a building at the La Ceramica facility. Within months, CBP had to vacate that space due to sewage and safety concerns and moved its IMF operations to a different La Ceramica building in September 2022. Appendix D shows a timeline of the San Juan IMF's operations.

From August 2021 through December 2022, San Juan field office leadership reported that officers conducted minimal screening of packages received in San Juan because the La Ceramica facility did not have sufficient space or a vault for CBP officers to detain mail onsite. San Juan field office leadership reported holding several discussions with USPS about a new space agreement but indicated officials did not arrive at an agreement.

These issues occurred because, as OFAM officials acknowledged, OFAM had not established a formal escalation process for local and regional staff to raise the unresolved issues to headquarters. OFAM headquarters officials said that local and regional staff had a basic understanding of how the field offices should escalate issues. OFAM headquarters officials were unaware of the condemned San Juan IMF building, the subsequent temporary facilities that limited mail screening, and the problems the San Juan Field Office had negotiating new space.

### **Conclusion**

Unresolved maintenance and life safety issues can threaten officer safety at the IMFs. Leasing poorly maintained or partial unusable space is an inefficient use of Government resources. Further, operating without a space agreement may continue to impact IMF mail screening operations, which increases the risk of allowing drugs and other illicit items to enter the United States. Had CBP properly managed its IMF space agreements, it could have put \$3.2 million to better use.





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## **Recommendations**

**Recommendation 1:** We recommend that CBP's Office of Facilities and Asset Management:

- a. evaluate all International Mail Facility space agreements to identify unusable space for future cost savings; and
- b. revise agreements with unusable space, given the \$3.2 million in funds that could have been put to better use identified in this audit.

**Recommendation 2:** We recommend that CBP's Office of Facilities and Asset Management evaluate its International Mail Facilities and lease agreements and take actions to ensure safety and the ability to meet screening requirements.

**Recommendation 3:** We recommend that CBP's Office of Facilities and Asset Management develop and implement a process for escalating and effectively resolving local and regional facility issues.

## **Management Comments and OIG Analysis**

CBP provided management comments on a draft of this report. In its response, CBP acknowledged the importance of effective collaboration with GSA and USPS and committed to ensuring CBP has adequate infrastructure to support its border security mission at the IMFs. We included the comments in their entirety in Appendix B. We also received technical comments from CBP on the draft report, and we revised the report as appropriate.

CBP concurred with all three recommendations, which we consider resolved and open. A summary of the CBP response and our analysis follows.

**CBP Response to Recommendation 1:** Concur. CBP OFAM will verify current IMF space needs and allocations and document its findings. OFAM will coordinate with GSA regarding any modifications to its lease and operating agreements. Estimated Completion Date (ECD): October 31, 2024.

**OIG Analysis:** These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP provides its documented findings for all IMF space needs and copies of any revised lease and operating agreements.

**CBP Response to Recommendation 2:** Concur. CBP OFAM will collaborate with GSA to review CBP's lease agreement language and will offer recommendations for GSA to include in its leases with USPS to ensure life safety concerns are addressed in a timely manner. ECD: October 31, 2024.



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**OIG Analysis:** These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP provides the results of its lease review with GSA, evaluation of all mail facilities, and documentation that life safety concerns and ability to meet screening requirements have been addressed at all mail facilities.

**CBP Response to Recommendation 3:** Concur. CBP OFAM will collaborate with stakeholders to develop a formal policy to evaluate, report, and mitigate local and regional facility issues. ECD: November 30, 2023.

**OIG Analysis:** These actions are responsive to the recommendation, which we consider open and resolved. We will close this recommendation when CBP provides their formal policy that documents the process of escalating and resolving local and regional facility issues.



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**Appendix A**  
**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*.

The objective of this audit was to determine whether CBP effectively manages IMF operations and the extent that CBP targets and interdicts inadmissible international mail entering the United States through IMFs. This report specifically addresses whether CBP effectively manages IMF operations. (We will issue a separate report related to our findings about the extent that CBP targets and interdicts inadmissible mail.) To answer this part of our objective, we reviewed Federal laws and regulations as well as DHS and CBP policies and guidance associated with managing international mail facilities. For FY 2018 through FY 2022, we assessed applicable criteria for IMF operations, including:

- DHS Directive 119-02, Revision Number 00, *Real Property Management Program*, December 10, 2012
- DHS Instruction 119-02-001, *Real Property Manual*, July 2010
- DHS Instruction 119-02-004, Revision Number 00, *Real Property Facility Condition Assessment*, July 3, 2018
- U.S. Customs Service *International Mail Operations and Enforcement Handbook*, August 2001
- CBP and USPS Memorandum of Understanding, 2017
- Standard operating procedures between local USPS and CBP officials at each operating IMF
- Occupancy agreements, tenancy agreements, and memorandums of agreement (space agreements) (CBP/GSA/USPS)
- Facility assessment reports for each operating IMF

In addition, we reviewed DHS' *Risk Management Fundamentals Homeland Security Risk Management Doctrine* (dated April 2011) and evaluated GAO's *Standards for Internal Control in the Federal Government*. We identified control weaknesses related to control activities and monitoring and made recommendations in this report that address these gaps.

To discuss and observe management of IMF operations, we conducted in-person site visits at six IMFs (Chicago, Honolulu, Los Angeles, Miami, Newark, and JFK) and virtual site visits at two IMFs (San Juan and St. Thomas). We interviewed CBP officials at each IMF location, including officials formerly located at the San Francisco IMF. Additionally, we interviewed CBP officials from OFAM and the Office of Safety and Health.



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We obtained and reviewed reports from facility assessments conducted at the IMFs in FY 2021. We reviewed the deficiencies listed in each report by priority and requested supporting documentation from CBP to evaluate the status of each deficiency. After CBP reported that nine “critical or life safety” issues were unresolved or potentially unresolved, we contacted the Assistant Commissioner of OFAM on November 29, 2022, and again on March 7, 2023, to inform her of these issues and request updated status information.

To calculate the total rent paid for the unusable space at the Honolulu and Newark IMFs, we first calculated the market rent subtotal by multiplying the amount of unusable space by the annual rate per square foot for each location. Then we calculated GSA’s Public Buildings Service fee subtotal by multiplying the amount of unusable space by the Public Buildings Service fee per square foot for each location. By adding the two subtotals (market rent and Public Buildings Service) and multiplying by the timeframe the space was unusable, we arrived at the total rent CBP paid for the unusable space at each mail facility.

We conducted this performance audit between April 2022 and June 2023 pursuant to the *Inspector General Act of 1978*, 5 U.S.C. §§ 401-424, and in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

#### **DHS OIG’s Access to DHS Information**

CBP provided timely responses to DHS OIG’s requests for information and did not delay or deny access to information we requested.



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**Appendix B**  
**CBP Comments to the Draft Report**

1300 Pennsylvania Avenue, NW  
Washington, DC 20229



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

August 17, 2023

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

FROM: Henry A. Moak, Jr.  
Senior Component Accountable Official  
U.S. Customs and Border Protection

8/17/2023  
X   
Signed by: HENRY A. MOAK, JR.

SUBJECT: Management Response to Draft Report: “CBP’s Management of International Mail Facilities Puts Officer Safety and Mission Requirements at Risk” (Project No. 22-039-AUD-CBP(a))

Thank you for the opportunity to 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.

CBP performs a critical role in safeguarding the public by interdicting inadmissible international mail entering the United States through International Mail Facilities (IMF). The CBP Office of Facilities and Asset Management (OFAM) is responsible for CBP’s portfolio of owned and leased real property, including the IMFs, which are managed in coordination with the General Services Administration (GSA) and the U.S. Postal Service (USPS). OFAM understands the importance of and is committed to effective collaboration with GSA and USPS to ensure CBP has adequate infrastructure to support its border security mission at IMFs—including anti-terrorism, anti-smuggling, trade compliance, and agriculture protection—while simultaneously facilitating the lawful trade that is critical to our Nation’s economy.

The draft report contained three recommendations with which CBP concurs. Enclosed find our detailed response to each recommendation. CBP previously submitted technical comments addressing accuracy and contextual 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. We look forward to working with you again in the future.

Enclosure





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**Enclosure: Management Response to Recommendations  
Contained in 22-039-AUD-CBP(a)**

OIG recommended that CBP's Office of Facilities and Asset Management:

**Recommendation 1:**

- a. evaluate all International Mail Facility space agreements to identify unusable space for future cost savings; and
- b. revise agreements with unusable space, given the \$3.2 million in funds that could have been put to better use identified in this audit.

**Response:** Concur. CBP OFAM will verify current IMF space needs and allocations, document findings, and prepare for a related discussion with GSA. CBP OFAM, in collaboration with GSA, will coordinate modifications to lease and operating agreements between GSA and USPS to accurately reflect CBP operational space requirements. Estimated Completion Date (ECD): October 31, 2024.

**Recommendation 2:** Evaluate its International Mail Facilities and lease agreements and take actions to ensure safety and the ability to meet screening requirements.

**Response:** Concur. CBP OFAM will collaborate with GSA to review lease agreement language and provide recommended provisions for inclusion in GSA lease agreements with USPS to ensure life safety concerns can be addressed in a timely manner. ECD: October 31, 2024.

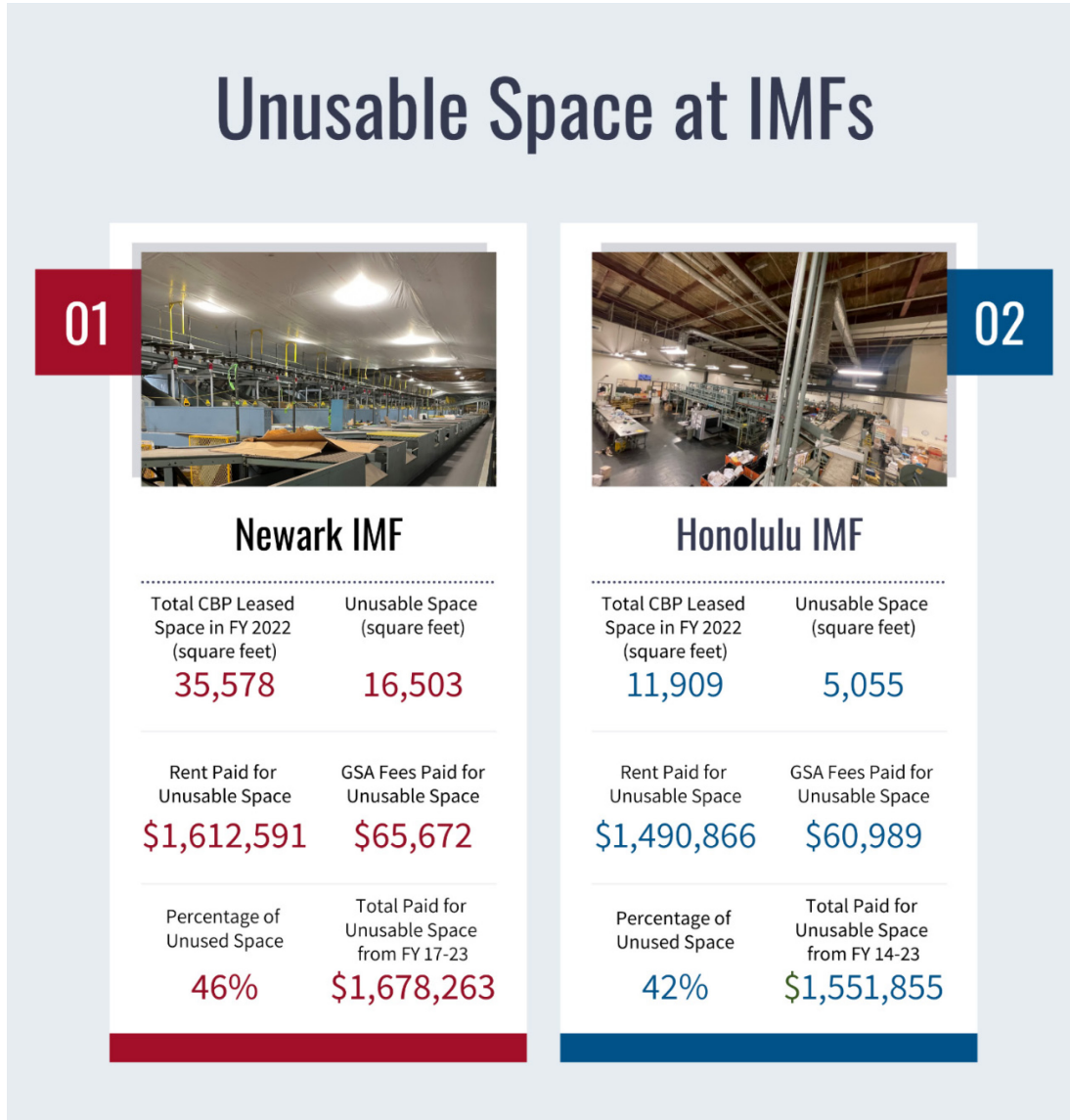
**Recommendation 3:** Develop and implement a process for escalating and effectively resolving local and regional facility issues.

**Response:** Concur. CBP OFAM will collaborate with stakeholders to implement a formal policy to address such facility issues. Specifically, OFAM will lead efforts to develop a process to evaluate, report, and mitigate local and regional IMF issues. ECD: November 30, 2023.



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**Appendix C**  
**Unusable Space at the Newark and Honolulu IMFs**



Source: DHS OIG analysis of CBP space and occupancy agreements

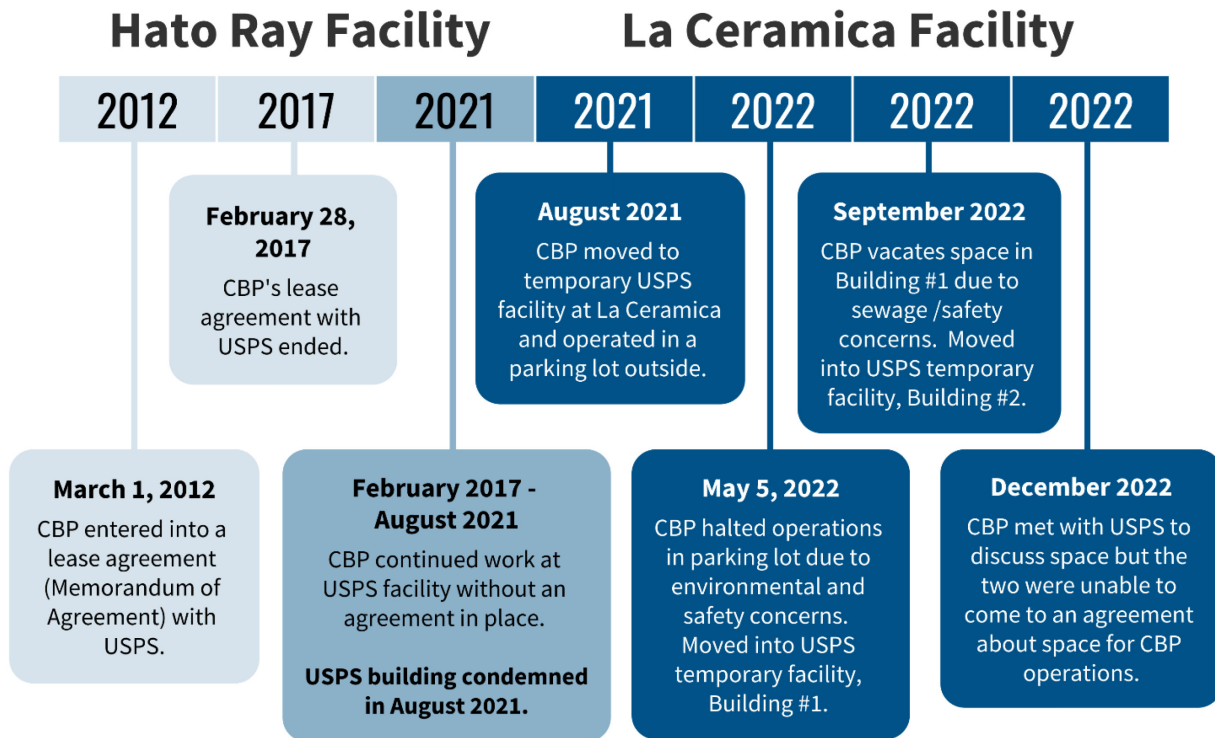


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**Appendix D**  
**San Juan IMF Historical Operation Timeline**

# San Juan IMF Timeline

History of CBP's San Juan IMF Operations



Source: DHS OIG analysis of CBP documents and statements by CBP officials



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**Appendix E**  
**Potential Monetary Benefits**

<b>22-039-AUD- CBP(a)</b>	<b>Unsupported Costs Questioned</b>	<b>Ineligible Costs Questioned</b>	<b>Total Questioned Costs</b>	<b>Funds to Be Put to Better Use</b>
Unusable IMF Space	\$0	\$0	\$0	\$3.2M
Totals	\$0	\$0	\$0	\$3.2M

Source: DHS OIG analysis of CBP documents and statements by CBP officials



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**Appendix F**  
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