May 2022

BORDER SECURITY

CBP Could Improve How It Categorizes Drug Seizure Data and Evaluates Training

Accessible Version

GAO Highlights

BORDER SECURITY

CBP Could Improve How It Categorizes Drug Seizure Data and Evaluates Training

Why GAO Did This Study

Within the Department of Homeland Security (DHS), CBP is responsible for securing the nation's borders and preventing the illegal flow of people, contraband, and drugs from entering the U.S. CBP has an important role in national efforts to prevent the use of illicit drugs and the misuse of prescription drugs. Specifically, CBP is responsible for interdicting drugs and working with other federal agencies to prevent their importation.

GAO was asked to review issues related to CBP's drug seizure data and training. This report examines (1) how CBP collects and categorizes drug seizure data in its systems and monitors trends in drug seizures, and (2) to what extent CBP trains its officers and agents on the process for recording drug seizures and evaluates its training.

GAO analyzed CBP drug seizure data from fiscal years 2016 through 2021, which were the most recent data available; and reviewed related policies and procedures. GAO also interviewed officials at CBP headquarters and 11 selected field locations, including officers and agents at those locations. GAO selected these locations to include varying levels of drug seizures and variety in geographic location, among other factors.

What GAO Recommends

GAO is making three recommendations, that CBP assess the drug type categories available in its data systems, and that OFO and Border Patrol each finalize and implement a plan to regularly evaluate their post-academy drug seizure training. DHS concurred with the recommendations.

What GAO Found

U.S. Customs and Border Protection (CBP) officers and agents follow a multi-step process when seizing drugs. This process includes collecting seizure data such as the drug type and concealment method in CBP data systems. CBP officials have several mechanisms to perform quality assurance efforts on drug seizure records. For example, they conduct supervisory reviews of the records for accuracy before they are finalized. CBP intelligence entities—such as field targeting and intelligence units—review seizure data in CBP data systems on a daily basis to inform their drug interdiction efforts, target drug smugglers, and monitor drug seizure trends. GAO found that the number of CBP drug seizures increased from about 65,000 in fiscal year 2016 to 99,000 in fiscal year 2021.

Number of U.S. Customs and Border Protection (CBP) Drug Seizures, Fiscal Years 2016 through 2021
Number of drug seizures (in thousands)
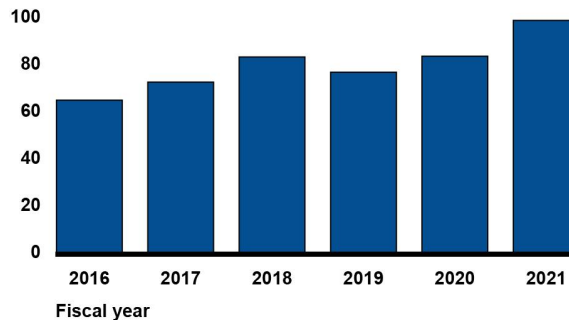
Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Data table for Number of U.S. Customs and Border Protection (CBP) Drug Seizures, Fiscal Years 2016 through 2021

Fiscal year	Drug seizures (in thousands)
2016	65.411
2017	73.117
2018	83.766
2019	77.302
2020	84.081
2021	99.28

Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

While CBP has various fields in its data systems for recording, analyzing, and using data on drug seizures, it has not assessed its categories for drug type to determine if they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents and if they are useful for targeting and intelligence. For example, GAO found that 23 percent of total drug seizures from fiscal years 2016 through 2021 were classified in a catchall drug type category—*Other drugs, prescriptions, and chemicals*. CBP intelligence officials GAO spoke with who use and analyze drug seizure data stated that they have some concerns with the

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United States Government Accountability Office

drug type categories available—particularly this catchall category—because the lack of specificity requires additional research, such as text searches. Assessing the drug type categories available in its data systems could strengthen the quality of CBP's drug seizure data and reduce the work for CBP intelligence officials who analyze the data.

While CBP officers and agents are trained on the process for recording drug seizures during their academy and post-academy programs, CBP has not evaluated its post-academy drug seizure training. Specifically, the Office of Field Operations (OFO) and U.S. Border Patrol have not evaluated them since they implemented them in 2011 and 2006, respectively. Finalizing and implementing a plan to regularly evaluate their post-academy drug seizure training would provide OFO and Border Patrol with the data and information needed to determine if the training is helping achieve CBP's goals related to drug seizures.

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Abbreviations

AMO	Air and Marine Operations
CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security
DMT	N, N-Dimethyltryptamine
LSD	Lysergic acid diethylamide
ODB	Other drugs, prescriptions, and chemicals

OFO	Office of Field Operations
PCP	Phencyclidine or phenylcyclohexyl piperidine
THC	Tetrahydrocannabinol

May 11, 2022

Congressional Requesters

The Department of Homeland Security's (DHS) U.S. Customs and Border Protection (CBP) is responsible for securing the nation's borders and preventing the illegal flow of people, contraband, and drugs from entering the U.S.[1] CBP has an important role in national efforts to prevent drug misuse—the use of illicit drugs and the misuse of prescription drugs. Specifically, CBP is responsible for interdicting drugs and working with other federal agencies to prevent their importation.[2] Members of Congress and other federal agency stakeholders have raised concerns about drugs that are concealed in legitimate goods—specifically, produce shipments—and smuggled into the country. CBP has reported on such instances in recent years. For example, in February 2021, CBP reported seizing $11.5 million worth of methamphetamine hidden with a commercial shipment of mixed produce from Mexico at the Pharr-Reynosa International Bridge in Texas.

In addition, the DHS Office of Inspector General has raised questions about the timeliness and accuracy of CBP's process for recording drug seizures in its data systems. For example, in 2021, the DHS Office of Inspector General found that drug seizures from international mail inspected at the John F. Kennedy International Airport were not recorded in CBP's system of record within the required time frame.[3]

You asked us to review issues related to CBP's drug seizure data and training. This report addresses (1) how CBP collects and categorizes drug seizure data in its systems, and monitors trends in drug seizures; and

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[1]For the purposes of this report, we use the term "drug" to describe both illegal drugs and prescription drugs that are being used for non-medical purposes (such as the misuse of opioids).

[2]In 2021, we included drug misuse on our High-Risk List, noting that federal agencies must effectively implement a strategic national response to drug misuse and make progress toward reducing rates of drug misuse and the resulting harmful effects to society. See GAO, *High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas,* GAO-21-119SP (Washington, D.C.: Mar. 2, 2021).

[3]See Department of Homeland Security, Office of Inspector General, OIG-21-27: *CBP Faced Challenges in its Inspections Processes and Physical Security at the JFK International Mail Facility [Redacted]*, Mar. 12, 2021.

(2) to what extent CBP trains its officers and agents on the process for recording drug seizures and evaluates its training.

To address both objectives, we interviewed officials via teleconference at a nongeneralizable sample of 11 CBP field locations—seven Office of Field Operations (OFO) ports of entry, two U.S. Border Patrol stations, and two Air and Marine Operations (AMO) branches. For the ports of entry and Border Patrol stations, we selected locations based on a mix of factors. One factor we considered was locations with the greatest number of drug seizures recorded in SEACATS—the official CBP system of record for tracking seized property, including drugs, and processing seizures—from fiscal years 2016 through 2020.[4] In selecting ports of entry, the other factors we considered were variety in port type and geographic location, as well as ports of entry with the greatest value of imported goods and the greatest number of land border crossings. In selecting Border Patrol stations, we also considered stations that varied in geographic location and that have immigration checkpoints.[5] For the AMO branches, we selected locations from among those with the greatest number of drug seizures from fiscal year 2016 through March 2021 using summary data from AMO's Tasking, Operations, and Management Information System; and variety in geographic location. For each location, we conducted two teleconferences: one with management, supervisors, and data specialists and a second with available officers and agents who are responsible for initial drug seizure recordation and who would have participated in drug seizure training.[6]

To address our first objective, we identified and analyzed CBP's policies, procedures, and other documentation that outline the drug seizure and recordation process. We also interviewed CBP officials in headquarters

[4]These were the most recent data available at the time of our selection. SEACATS was formerly known as the Seized Assets and Case Tracking System. CBP retired the full spelling of this system in July 2020, and only refers to it as the acronym now. SEACATS underwent a modernization effort that was completed in May 2018. According to CBP Office of Information Technology officials, this modernization did not affect the data we used in our review.

[5]Border Patrol immigration checkpoints are generally located between 25 and 100 miles from the border.

[6]When discussing our interviews with field officials, we refer collectively to both groups as "officials," management as "management officials," and non-management officials as "officers and agents." At the Border Patrol stations, in lieu of speaking with Border Patrol agents, we spoke with first-line supervisors who directly oversee a group of Border Patrol agents and are responsible for oversight of their drug seizure processing and recordation.

and in the 11 field locations. These officials provided us with perspectives on when and how CBP developed and updated the policies and procedures, requirements in these documents specifically related to seizing drugs and recording seizures in CBP data systems, and any challenges they faced when seizing drugs and recording data. We assessed CBP's policies and procedures for the drug seizure and recordation process against the control activities component of the *Standards for Internal Control in the Federal Government*.[7]

Furthermore, we assessed the mechanisms CBP headquarters and field officials use to ensure the quality of drug seizure records. To describe how CBP monitors drug seizure trends, we reviewed drug seizure-related products intelligence entities prepare to assist with their targeting efforts. We also interviewed knowledgeable officials from OFO's National Targeting Center and CBP's Office of Intelligence, as well as the CBP field targeting and intelligence units at all 11 field locations we selected.

We also analyzed data on drug seizure cases and drug seizures recorded in SEACATS from fiscal years 2016 through 2021, the most recent data available at the time of our review.[8] Specifically, we analyzed the number of CBP drug seizure cases and drug seizures by CBP component (OFO, Border Patrol, and AMO) when the component was listed as the discovering agency. We also analyzed data for this same time period on the following data fields: drug type, conveyance type, concealment method, and whether drugs were concealed in commodities. To assess the reliability of these data, we reviewed related documentation (such as data dictionaries and user manuals); interviewed agency officials responsible for managing the systems; interviewed end users of the drug seizure data; and performed electronic testing to identify any errors or omissions. We found these data to be sufficiently reliable for the purposes of presenting overall trends in drug seizure cases and drug seizures.

We also drew four random generalizable samples of drug seizure records from fiscal years 2019 and 2020 to examine how CBP officers and agents categorize certain drug types using the drug type categories available in

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[7]See GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: Sept. 2014).

[8]In our analysis, we define a "drug seizure case" as one offender (such as an individual person or business) associated with the drug seizure event and a "drug seizure" as each individual drug type seized within a drug seizure case. We did not analyze drug seizure trends based on the weight of seized drugs.

SEACATS and Border Patrol's e3—an application that Border Patrol uses to collect and transmit data related to its law enforcement activities, including drug seizures.[9] We selected these samples from two specific drug type categories in SEACATS and e3—namely *Marijuana* and *Other drugs, prescriptions, and chemicals*—because they were the top two drug types seized during the time frame of our review.[10] All estimates are presented in the report along with their margins of error at the 95 percent confidence level. We assessed CBP's categorization of drug seizure data against federal internal control standards for information and communication and DHS Directive 139-02 on information quality to review what steps CBP took to incorporate information quality criteria into its dissemination of drug seizure data.[11]

To address our second objective, we reviewed agency documentation, such as training course guides, related to CBP's academy and post-academy drug seizure training efforts. We also reviewed CBP and component-specific policies and plans related to training evaluation. We interviewed CBP training officials to identify actions they have taken related to the drug seizure training design, development, implementation, and evaluation process. We also interviewed CBP officials at the 11 field locations to obtain their perspectives on the benefits and challenges of

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[9]We analyzed data from SEACATS because it is the official system of record for tracking all CBP drug seizures, and all OFO, Border Patrol, and AMO seizures are to be tracked using this system. We also assessed e3 data to determine how Border Patrol categorized drug type in statistical samples of drug seizure records. Border Patrol uses e3 to transfer information into SEACATS. Specifically, a Border Patrol agent first records a drug seizure in e3. Using an automatic transfer button in e3, they then merge the relevant information into SEACATS via a one-time transfer process. Border Patrol also uses e3 for other operational purposes, such as public reporting of drug seizure data. To assess the reliability of e3 data, we reviewed related documentation (such as user manuals); interviewed agency officials responsible for managing the systems; interviewed end users of the drug seizure data; and performed electronic testing to identify any errors or omissions. We found these data to be sufficiently reliable for the purposes of drawing e3 drug seizure data for our probability sample analyses. We used data from fiscal years 2019 and 2020 because these were the most recent two fiscal years of data available at the time we drew our statistical samples that took place after the SEACATS modernization in May 2018. AMO agents also track mission activities, including drug seizures, in the Tasking, Operations and Management Information System, but there is no automatic transfer process between SEACATS and this system.

[10]In addition, CBP intelligence officials who review drug seizure data for targeting and trend monitoring efforts told us they have concerns with these particular drug type categories in CBP data systems, which we discuss in more detail later in this report.

[11]See GAO-14-704G; and Department of Homeland Security, *Information Quality*, Directive 139-02, November 21, 2019.

drug seizure training. We assessed CBP's training efforts against the control activities and control environment components of federal internal control standards.[12] Further, we assessed CBP's training evaluation efforts against our guide for assessing federal training programs, as well as federal internal control standards for monitoring to review what steps CBP took to systematically plan for and evaluate the effectiveness of its training efforts.[13] We also assessed CBP's efforts against relevant federal laws and CBP standard operating procedures for administering post-academy training programs.[14] For more details on our scope and methodology, see appendix I.

We conducted this performance audit from February 2021 through May 2022 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.

Background

CBP Roles and Responsibilities for Importing Goods and Seizing Drugs

CBP facilitates and enforces a process for the importation of goods into the U.S., in collaboration with other federal agencies and with companies, including customs brokers. The processing of imported goods includes three stages: pre-arrival, arrival/cargo release, and post-release.

1. **Pre-arrival.** Before goods leave their country of origin, CBP collects initial information from the carrier and the importer.

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[12]See GAO-14-704G.

[13]See GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government,* GAO-04-546G, (Washington, D.C.: Mar. 2004); and GAO-14-704G.

[14]See, e.g., 5 U.S.C. §§ 4101, 4103, and Border Patrol, *National Field Training Program Standard Operating Procedures*, Version 2.0; Apr. 8, 2015.

2. **Arrival/cargo release.** As goods arrive in the U.S. at a port of entry, CBP and other agencies with regulatory responsibilities review documents and examine cargo, if deemed necessary.[15] At this stage, CBP may target goods for possible inspection by port of entry officials. If officials do not find any legal or regulatory violations, CBP authorizes the entry of the goods.

3. **Post-release.** After releasing goods into the U.S. market, CBP and other agencies review additional documentation provided by the importer or the broker to assess compliance with U.S. trade laws and collect duties, taxes, and fees owed. CBP maintains data on imported goods in its Automated Commercial Environment information system.[16]

Three CBP components—OFO, Border Patrol, and AMO—have primary responsibility for border security, which includes seizing drugs discovered during inspections and operations conducted in their various areas of responsibility.

- OFO is responsible for inspecting pedestrians, passengers, and cargo—including international mail and express cargo—at the more than 320 air, land, and sea ports of entry.[17]

- Border Patrol is responsible for securing U.S. borders between ports of entry, including at immigration checkpoints generally located

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[15]Ports of entry are facilities that provide for the controlled entry into or departure from the Unites States. Specifically, a port of entry is any officially designated location (seaport, airport, or land border location) where CBP clears passengers, goods, and other items, collects duties, and enforces customs laws; and where officers inspect persons seeking to enter or depart, or apply for admission into the U.S. pursuant to U.S. immigration and travel controls.

[16]We have previously reported on CBP's Automated Commercial Environment information system. See GAO, *Customs and Border Protection: Automated Trade Data System Yields Benefits, but Interagency Management Approach Is Needed*, GAO-18-271 (Washington, D.C.: Mar. 14, 2018).

[17]Inbound international mail generally arrives in the U.S. via five International Service Centers located in New York City, New York; Miami, Florida; Los Angeles, California; San Francisco, California; and Chicago, Illinois. Ground handlers employed by air carriers transport the mail to be accepted by the U.S. Postal Service, after which it is presented to CBP for inspection. Express cargo is handled by express consignment operators such as FedEx and the United Parcel Service. CBP inspects express cargo at offsite airport facilities or at major carriers' hub locations. See GAO, *International Mail Security: Costs and Benefits of Using Electronic Data to Screen Mail Need to Be Assessed*, GAO-17-606 (Washington, D.C.: Aug. 2, 2017).

between 25 and 100 miles from the border.[18] Border Patrol's area of responsibility is divided among 20 sectors, which are further divided into stations.

- AMO is responsible for securing U.S. borders between ports of entry in the air, marine, and land domains. AMO's operations are divided among 14 branches, which are divided into units that conduct air and marine missions.[19] For an illustration of examples of OFO, Border Patrol, and AMO operating locations where they typically seize drugs, see figure 1.

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[18]For additional information on Border Patrol checkpoints, see GAO, *Border Patrol: Issues Related to Agent Deployment Strategy and Immigration Checkpoints*, GAO-18-50 (Washington, D.C.: Nov. 8, 2017). We also have ongoing work examining Border Patrol's use of immigration checkpoints and plan to report on the results of that work later this year.

[19]AMO often serves in a supporting role in CBP drug seizures and is therefore not often responsible for processing and data entry.

Figure 1: Examples of U.S. Customs and Border Protection Operating Locations Where Drugs Are Typically Seized
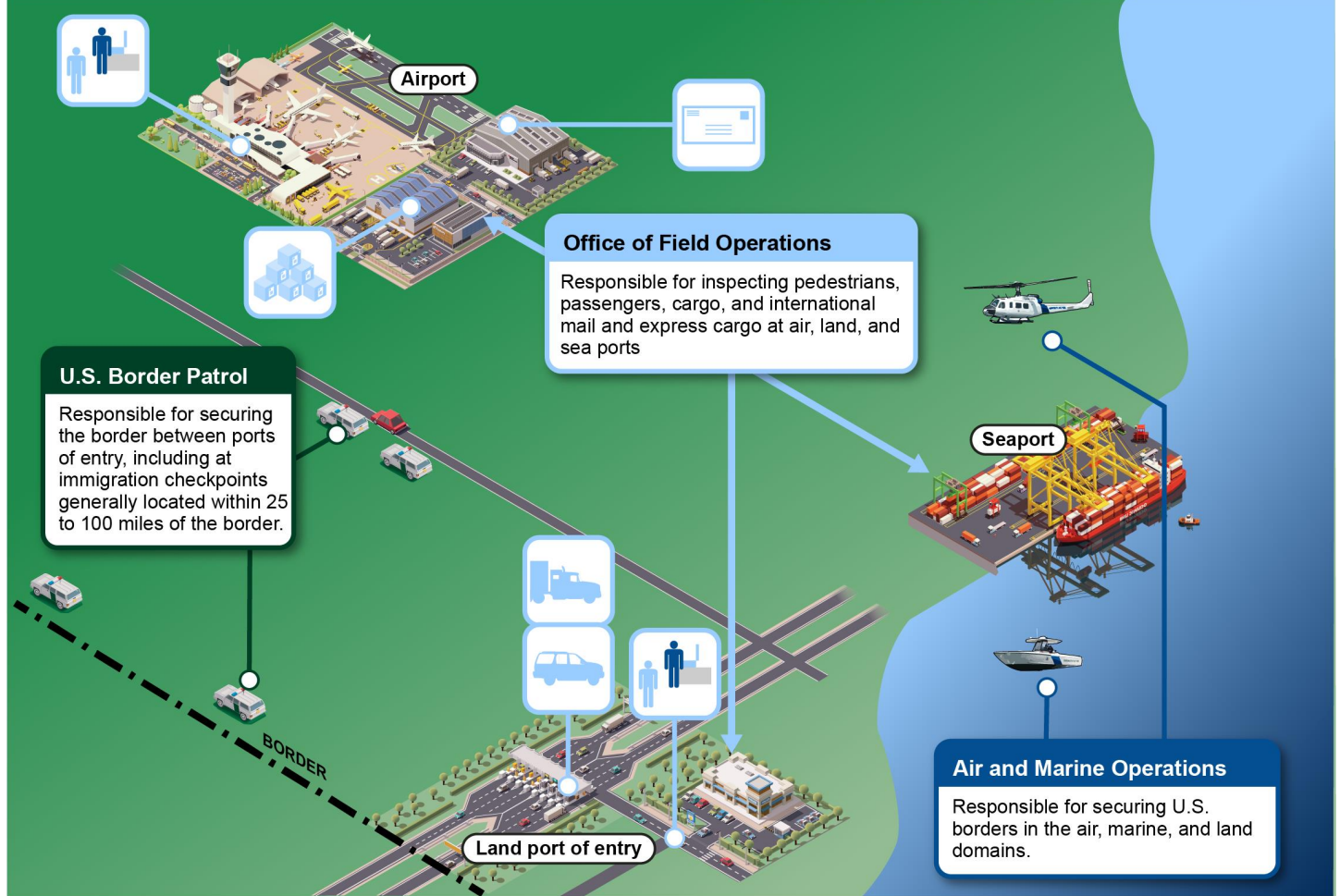
Sources: GAO analysis of U.S. Customs and Border Protection information; Taras Livvy/stock.adobe.com. | GAO-22-104725

Text of Figure 1: Examples of U.S. Customs and Border Protection Operating Locations Where Drugs Are Typically Seized

- Office of Field Operations. Responsible for inspecting pedestrians, passengers, cargo, and international mail and express cargo at air, land, and sea ports

- U.S. Border Patrol. Responsible for securing the border between ports of entry, including at immigration checkpoints generally located within 25 to 100 miles of the border.

- Air and Marine Operations. Responsible for securing U.S. borders in the air, marine, and land domains.

Sources: GAO analysis of U.S. Customs and Border Protection information; Taras Livvy/stock.adobe.com. | GAO-22-104725

During their inspections and operations, OFO, Border Patrol, and AMO have discovered various methods used to smuggle drugs. For example, OFO has seized drugs that were concealed in other imported goods, such as produce shipments. Figure 2 provides examples of drug seizures and smuggling methods.

Figure 2: Photos of Drug Seizure Smuggling Methods Discovered by U.S. Customs and Border Protection (CBP) Components

Office of Field Operations officers discovered methamphetamine in a shipment of watermelons at an Otay Mesa port of entry commercial facility in May 2021.
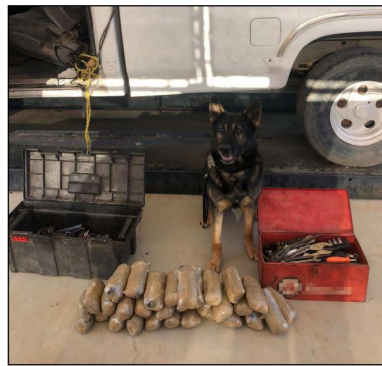
U.S. Border Patrol agents at an El Centro Sector checkpoint discovered methamphetamine hidden in toolboxes in August 2021.
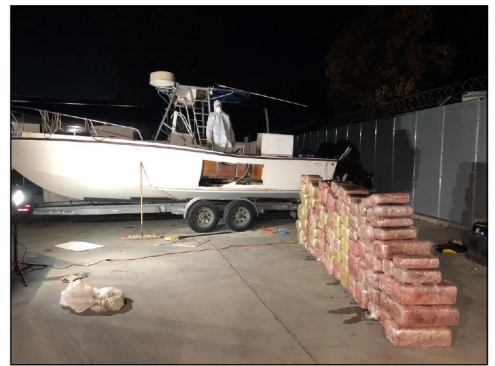
Air and Marine Operations agents at the San Diego Air and Marine Branch discovered marijuana hidden in the deck of a recreational vessel in December 2020.

Source: GAO analysis of CBP information; CBP (photos). | GAO-22-104725

CBP Components' Responsibilities for Drug Seizure Technology, Targeting, and Trends

Additional offices and groups within CBP assist OFO, Border Patrol, and AMO with their drug seizure responsibilities by managing technology, conducting drug targeting, and monitoring drug seizure intelligence and trends in the field. For example:

- CBP's Office of Information Technology is responsible for managing CBP's technology infrastructure and information technology operations, including SEACATS.[20]

- OFO's National Targeting Center is responsible for providing advance information and research about high-risk travelers and cargo— including suspected drugs—and facilitating coordination between law enforcement and intelligence agencies to support CBP's mission. The

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[20]While CBP is the system owner of SEACATS, U.S. Immigration and Customs Enforcement also uses the system.

National Targeting Center operates 24 hours a day and 7 days a week.

- CBP's Office of Intelligence develops, coordinates, and implements CBP's intelligence capabilities and provides CBP personnel with intelligence on threats and trends related to drugs.

- Field targeting and intelligence units conduct drug targeting and monitor drug seizure trends in the field.

CBP Drug Seizure Policies, Procedures, and Total Seizures

Once a CBP officer or agent seizes drugs, the officer or agent is to follow CBP-wide policies and procedures in the *Seized Asset Management and Enforcement Procedures Handbook* (CBP handbook) for drug seizure processing and recordation, which include timely and accurate data entry and appropriate supervisory review.[21] The handbook also outlines the roles and responsibilities of key personnel in the drug seizure process. OFO's Fines, Penalties, and Forfeitures Division and Border Patrol's Asset Forfeiture Program are responsible for oversight of national policies related to drug seizures.[22]

- Officers and agents are responsible for seizing drugs and inputting seizure data into SEACATS.[23]

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[21]See CBP, *Seized Asset Management and Enforcement Procedures Handbook* (July 2011). We refer to this as the "CBP handbook" throughout the report. According to OFO officials, at the time of our review, the CBP handbook has been undergoing its first major update since 2011. OFO is responsible for updating the CBP handbook. OFO officials stated that, upon completion of this update, OFO plans to update the CBP handbook every five years thereafter.

[22]AMO does not have a designated headquarters forfeiture office; the Director of AMO is responsible for ensuring timely and accurate drug seizure recordation and arranging for the storage of seized property, including drugs.

[23]CBP agriculture specialists inspect agricultural products to prevent the introduction of pests, diseases, and agro- and bio-terrorism into U.S. agriculture. According to OFO officials, CBP agriculture specialists are not responsible for seizing drugs—if they find a drug during an inspection, they inform an OFO officer who processes and records the drug seizure. For additional information on CBP's role in the federal agriculture inspection process, see GAO, *Imported Agriculture: Updated Planning and Communication Could Enhance Agency Coordination of Inspections*, GAO-21-471 (Washington, D.C.: June 1, 2021).

- Supervisors are to review and approve drug seizure records in SEACATS and provide guidance and oversight to their officers and agents on the drug seizure process.

- Seized Property Specialists are to review drug seizure reports for accuracy and also ensure the timely transfer of seized drugs to CBP vaults.

- Paralegals are to review the legal sufficiency of drug seizure cases.

CBP data indicate that drug seizure cases increased from about 53,000 in fiscal year 2016 to about 76,000 in fiscal year 2021. Further, the number of drug seizures increased from about 65,000 in fiscal year 2016 to about 99,000 in fiscal year 2021 (see figure 3).[24]

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[24]We analyzed the number of drug seizure cases and drug seizures conducted by OFO, Border Patrol, and AMO when they were listed as the discovering agency in SEACATS from fiscal years 2016 through 2021. We did not analyze the weight of seized drugs or include drug seizures where OFO, Border Patrol, and AMO participated in the seizure but did not discover the drug. SEACATS data on drug seizures are collected at multiple levels: (1) When a CBP officer or agent seizes one or multiple drugs from one or multiple offenders, the entire incident is referred to as a drug seizure event. (2) Within a drug seizure event, there may be one or multiple drug seizure cases. In our analysis, we define a "drug seizure case" as one offender (such as an individual person or business) associated with the drug seizure event. (3) Within a drug seizure case, there may be one or multiple types of drugs seized. In our analysis, we define a "drug seizure" as each individual drug type seized within a drug seizure case. For example, if during an inspection, an OFO officer seized drugs from two individual offenders, we considered that as two "drug seizure cases" in our analysis. If the officer seized two types of drugs from each offender, we considered that as four "drug seizures" in our analysis.

Figure 3: Number of U.S. Customs and Border Protection (CBP) Drug Seizure Cases and Drug Seizures, Fiscal Years 2016 through 2021

Number (in thousands)

Fiscal year

- Number of drug seizure cases
- Number of drug seizures
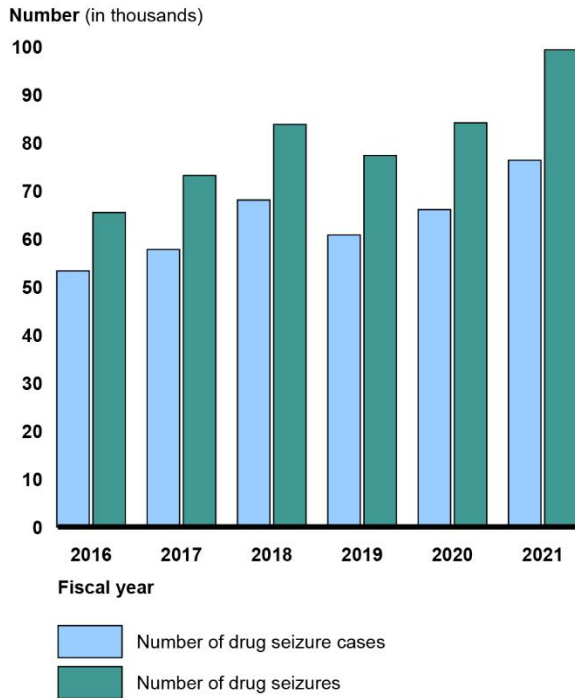
Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Data table for Figure 3: Number of U.S. Customs and Border Protection (CBP) Drug Seizure Cases and Drug Seizures, Fiscal Years 2016 through 2021

Fiscal year	Number of drug seizure cases	Number of drug seizures
2016	53277	65411
2017	57737	73117
2018	68032	83766
2019	60765	77302
2020	66013	84081
2021	76294	99280

Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Notes: We analyzed the number of drug seizure cases and drug seizures conducted by CBP's Office of Field Operations (OFO), U.S. Border Patrol, and Air and Marine Operations (AMO) when the component was listed as the discovering agency in SEACATS (formerly known as the Seized Assets and Case Tracking System) from fiscal years 2016 through 2021. We did not analyze the weight of seized drugs or include drug seizures where OFO, Border Patrol, and AMO participated in the seizure but did not discover the drug. In our analysis, we define a "drug seizure case" as one offender (such as an individual person or business) associated with the drug seizure event and a "drug seizure" as each individual drug type seized within a drug seizure case.

CBP Drug Seizure Training

CBP's Office of Training and Development establishes standards and policies for designing, developing, delivering, and evaluating CBP-wide training courses and establishing training standards and policies. The Office of Training and Development also manages the three academies where prospective CBP officers and agents receive basic training—the Field Operations Academy for OFO officers, the Border Patrol Academy for Border Patrol agents, and the Air and Marine Operations Academy for AMO agents. During these multi-week basic training programs, the academies cover a broad range of law enforcement topics, including drug seizure processing and recordation, and prospective officers and agents must demonstrate their proficiency in the basic training program in order to graduate. After graduating from the academy, CBP officers and agents have various opportunities for additional training, including drug seizure training. OFO, Border Patrol, and AMO have divisions that design and develop training on a wide range of topics including drug seizures.

CBP Could Improve Drug Seizure Data Categorization Used in Targeting and Intelligence

CBP Has Processes to Collect, Record, and Review Drug Seizure Data

CBP has a multi-step process outlined in the CBP handbook that its officers and agents are required to follow when seizing drugs.[25] When a CBP officer or agent encounters a suspected drug, they are to conduct a test to obtain a preliminary indication of the presence of a drug—referred to as a presumptive field test.[26] If the test result is positive, the officer or agent is to initiate the seizure process and notify their supervisor. The

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[25]CBP is required to follow all seizure procedures outlined in the CBP handbook unless CBP headquarters approves a waiver.

[26]CBP officers and agents use various devices to conduct the presumptive field tests, including color-changing test kits and handheld electronic testing devices. A positive presumptive field test result is one factor CBP uses to establish probable cause for an arrest or seizure. See GAO, *Border Security: CBP Has Taken Actions to Help Ensure Timely and Accurate Field Testing of Suspected Illicit Drugs*, GAO-21-286 (Washington, D.C.: Apr. 26, 2021).

officer or agent then weighs the drug using a calibrated scale and places it in a storage container. Within 24 hours of seizing the drug, the officer or agent must start a SEACATS record.[27] The officer or agent must then complete the record and submit it to their supervisor for review within 24 hours of starting it. Their supervisor is to review the record for accuracy, and must approve it within 24 hours. Subsequently, CBP seized property specialists are to review drug seizure records in the system for accuracy and ensure the proper transfer of seized drugs to CBP vaults. CBP paralegals are to review the legal sufficiency of the seizure and identify any deficiencies in the record prior to the legal disposition of the case or the drug's destruction. Figure 4 summarizes the CBP drug seizure process.

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[27]CBP drug seizure records contain a variety of data on the drug seizure scenario, such as the type of drug seized, the conveyance type used to transport the drug, and the concealment method used to hide the drug.

Figure 4: U.S. Customs and Border Protection (CBP) Drug Seizure Process

When a CBP officer or agent encounters a suspected drug, they are to conduct a presumptive field test. If the test result is positive, they are to begin the seizure process and alert their supervisor.

Within 24 hours of seizing the drug, the officer or agent must start a SEACATS record.

The officer or agent is to calibrate the scales and weigh the seized drug. After this, they are to place the drug in an evidence container and store it in a CBP vault.

If a Border Patrol agent makes the seizure, they record it first in the e3 application in the Enforcement Integrated Database and then transfer select information into SEACATS via an automatic transfer button.

The officer or agent is to populate relevant information about the seizure in the SEACATS record.

A Seized Property Specialist is to review the SEACATS record for accuracy.

Within 24 hours of receiving the SEACATS record, the supervisor must review and approve it.

Within 24 hours of starting the SEACATS record, the officer or agent must submit the record to a supervisor.

A paralegal is to review the SEACATS record for legal sufficiency.

The seized drug is to stay in a CBP vault until the legal disposition of its case or its destruction.

Source: GAO analysis of CBP information. | GAO-22-104725

Text of Figure 4: U.S. Customs and Border Protection (CBP) Drug Seizure Process

1. When a CBP officer or agent encounters a suspected drug, they are to conduct a presumptive field test. If the test result is positive, they are to begin the seizure process and alert their supervisor.

2. Within 24 hours of seizing the drug, the officer or agent must start a SEACATS record.

3. The officer or agent is to calibrate the scales and weigh the seized drug. After this, they are to place the drug in an evidence container and store it in a CBP vault.

4. If a Border Patrol agent makes the seizure, they record it first in the e3 application in the Enforcement Integrated Database and then transfer select information into SEACATS via an automatic transfer button.

5. The officer or agent is to populate relevant information about the seizure in the SEACATS record.

6. Within 24 hours of starting the SEACATS record, the officer or agent must submit the record to a supervisor.

7. Within 24 hours of receiving the SEACATS record, the supervisor must review and approve it.

8. A Seized Property Specialist is to review the SEACATS record for accuracy.

9. A paralegal is to review the SEACATS record for legal sufficiency.

10. The seized drug is to stay in a CBP vault until the legal disposition of its case or its destruction.

Notes: This figure depicts the CBP drug seizure process Office of Field Operations officers, U.S. Border Patrol agents, and Air and Marine Operations (AMO) agents must follow when seizing a drug. There may be additional steps in the drug seizure process—such as taking photographs of the seized drug and obtaining a Federal Drug Identification Number from the El Paso Intelligence Center for certain seizures that meet a specific weight threshold—that are not depicted here.

SEACATS was formerly the Seized Assets and Case Tracking System. CBP retired the full spelling of this system in July 2020, and only refers to it as the acronym now. While SEACATS is CBP's official system of record to track drug seizures, Border Patrol agents also track drug seizures in e3—an application that Border Patrol uses to collect and transmit data related to its law enforcement activities. A Border Patrol agent first records a drug seizure in e3 and using an automatic transfer button in e3, they then merge the relevant information into SEACATS via a one-time transfer process. After this transfer is complete, an agent verifies that the information was transferred over correctly and completes the additional SEACATS data fields before submitting the record to their supervisor for review. AMO agents also track mission activities, including drug seizures, in the Tasking, Operations and Management Information System. There is no automatic transfer process between SEACATS and the Tasking, Operations and Management Information System; AMO agents must transfer the seizure information manually between the systems, which is why this system is not depicted in this figure.

Source: GAO analysis of CBP information. | GAO-22-104725

CBP field officials we spoke with provided perspectives on the drug seizure process and the CBP handbook. Officials we spoke with at 10 of the 11 locations found the drug seizure process to be clear. For example, management officials at one port of entry stated that the drug seizure process is clear because the CBP handbook is detailed and CBP provides various resources to assist OFO officers. Further, in their experience, when CBP adds a new seizure policy to the CBP handbook, the OFO Fines, Penalties, and Forfeitures Division disseminates the change to field management via email. Those management officials then distribute the new information to their officers and agents via memos. In addition, field officials we interviewed at five of the 11 locations provided suggestions for how to improve the seizure process outlined in the CBP

handbook. These included adding examples of seizure scenarios into the process steps and including information on how officers and agents can coordinate with other DHS components (such as U.S. Immigration and Customs Enforcement) during the drug seizure process when making a joint seizure.

CBP field officials we spoke with at five of the 11 locations developed location-specific guidance documents and resources for their officers and agents to use to supplement the CBP handbook. For example, management officials at one port of entry stated that they developed standard operating procedures that describe the location-specific process for transporting seized drugs to a CBP vault. This guidance outlines the role of each port of entry official in the transportation process, as well as the procedures they must follow when handling the drugs. Similarly, management officials at one Border Patrol station created a location-specific checklist for their supervisory agents to use when they review drug seizure records in SEACATS.

Further, CBP headquarters and field officials have several mechanisms to ensure the quality of drug seizure records, including:

- **Supervisory review.** The supervisory review process takes place after a CBP officer or agent submits a SEACATS record to a supervisor. Management officials told us they typically look for accuracy issues with the seizure narrative—a free-text field in SEACATS where CBP officers and agents describe the drug seizure scenario—and transposition errors in the drug seizure weight field. According to management officials at nine of the 11 locations we spoke with, they have not noticed any consistent errors with seizure recordation. However, some of these officials told us that they occasionally see small errors such as typos or find that the seizure narratives are not comprehensive.

- **Headquarters review.** CBP officials at headquarters also perform reviews of drug seizure records. For example, Border Patrol headquarters officials stated that, depending on the drug type, they review all drug seizures in e3 and SEACATS that meet a certain weight threshold. The purpose of these reviews is to ensure the seizure record is sufficient for any legal proceedings that may involve the seized drugs. Additionally, the CBP Office of Information Technology conducts an annual review of SEACATS drug seizure records to ensure that CBP officers and agents populated them correctly. The Office of Information Technology also produces a

ledger that outlines discrepancies between the system and seized drugs in storage for correction.

- **CBP Self-Inspection Program.** Management officials we spoke with at the nine OFO and Border Patrol field locations stated that they review their locations' results from the CBP Self-Inspection Program— an annual internal review, whereby management completes worksheets to assess compliance with CBP policies and procedures.[28] OFO and Border Patrol have specific annual self-assessment worksheets focused on drug seizure recordation that include reviews of the timely submission and review of SEACATS records. For example, in the 2021 cycle, the OFO-wide compliance rate for the timeliness of the submission of drug seizure documentation to headquarters was 86 percent, which was an increase of 19 percentage points from the 2020 cycle. Additionally, in the 2020 Self-Inspection Program cycle, the Border Patrol-wide compliance rate for the approval of drug seizure records in a timely manner by Border Patrol supervisors was 83 percent, which was an increase of 22 percentage points from the 2019 cycle.[29]

- **Other quality assurance activities.** Management officials we spoke with at four of the 11 field locations shared examples of additional reviews they perform on drug seizure records. For example, at one port of entry, management officials receive daily reports from SEACATS that outline all active records that their officers are working on, and they perform spot checks on a selected number of records to ensure they are accurate. Additionally, at one Border Patrol station, management officials have a checklist they use when reviewing each drug seizure record that ensures the data are accurate and the record is prepared for the legal case surrounding the seizure. Further, at one AMO branch, an intelligence research specialist is responsible for reviewing all drug seizure records biweekly to ensure they are accurate.

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[28]We have previously reported on CBP's Self-Inspection Program. See GAO, *Land Ports of Entry: CBP Should Update Policies and Enhance Analysis of Inspections*, GAO-19-658 (Washington, D.C.: Aug. 6, 2019). There are no AMO Self-Inspection Program worksheets related to drug seizures.

[29]The CBP Self-Inspection Program cycle is from February through January each year.

CBP Has Entities that Monitor Drug Seizure Trends Using Seizure Data

We have previously reported that CBP has targeting processes to identify and target high-risk persons, commercial vehicles, and cargo before arrival at a port of entry.[30] CBP intelligence officials review seizure data in SEACATS and e3 on a daily basis to inform their drug interdiction efforts, target drug smugglers, and monitor drug seizure trends. Specifically, CBP uses a combination of headquarters-level efforts at OFO's National Targeting Center and CBP's Office of Intelligence, and field-level targeting and intelligence units to identify trends in drugs being smuggled into the U.S.

National Targeting Center

The National Targeting Center has a lead role in identifying trends and patterns in drug smuggling. CBP intelligence officials at the center stated they rely on SEACATS to access drug seizure data that they use to predict future seizures and identify drug seizure trends and patterns.[31] In performing their analysis, the CBP intelligence officials stated they review a combination of discrete data fields available in SEACATS, as well as the free-text narrative field where CBP officers and agents describe the drug seizure scenario. For example, these officials conduct reviews of drug seizure data to identify common trends at certain ports of entry to inform their efforts to prevent drug smugglers from port shopping—a tactic in which smugglers try smuggling at multiple ports of entry to see where it may be the most effective. They also use drug seizure data to target drug smugglers across all CBP ports of entry by flagging certain persons and shipments for an inspection based on prior drug seizure history. For example, they may compare the value of an incoming shipment to a business's prior shipping patterns to look for anomalies. They also review the data to see what seizure patterns exist for certain items.

CBP intelligence officials at the National Targeting Center also provide drug seizure trend information to field officials in a variety of formats to

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[30]See the list of related GAO products at the end of this report for examples of our previous work on CBP targeting efforts.

[31]We refer to the groups who use drug seizure data to inform their drug interdiction efforts, target drug smugglers, monitor drug seizure trends, and conduct intelligence activities collectively as CBP intelligence officials.

assist with their localized targeting efforts. Management officials at the ports of entry we interviewed shared examples of how the National Targeting Center communicates seizure trend information with them. For example, management officials at one port of entry stated intelligence officials from the National Targeting Center send emails on a daily basis with drug seizure data and trends that affect the port of entry's targeting operations. Management officials at another port of entry stated that they receive weekly intelligence briefings from the National Targeting Center that include drug seizure trend information they use in their daily operations.

Office of Intelligence

The CBP Office of Intelligence is responsible for analyzing drug seizure data to identify transnational crime and tactics, techniques, and procedures used to smuggle drugs. Specifically, these intelligence officials told us that they use data from SEACATS and e3 on a regular basis to analyze seizures, monitor trends, and generate reports. The Office of Intelligence also produces intelligence products that CBP leadership uses to inform decision making in the border security environment. For example, the Office of Intelligence issues a report that forecasts the CBP threat landscape.[32] As a part of this report, the intelligence officials assess emerging drug seizure trends using data to better predict where and what drug types will be the most frequently smuggled in the future.

The Office of Intelligence is also responsible for assisting CBP field officials with their drug seizure targeting and intelligence efforts. According to CBP intelligence officials, field officials have access to information managed by the Office of Intelligence that contains drug seizure trends and intelligence information. Additionally, they stated CBP field officials can request that the Office of Intelligence review and analyze specific trends they are seeing at their location. Management officials we spoke with at field locations shared examples of how the Office of Intelligence communicates drug seizure data with them. For example, management officials we interviewed at one port of entry stated the Office of Intelligence shares drug seizure trends and intelligence with the port daily through emails and verbal briefings that provide information used in the port of entry's daily officer meeting. Management officials at

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[32]See CBP Office of Intelligence, *Forecasting the CBP Threat Landscape – Fiscal Year 2022 to Fiscal Year 2027* (August 6, 2021).

one AMO branch shared that they interact with the Office of Intelligence through weekly regional meetings where they discuss drug seizure trends and intelligence to inform drug seizure targeting for the week.

Field Targeting and Intelligence Units

As we have previously reported, CBP field locations have dedicated targeting and intelligence units that monitor local drug smuggling trends.[33] Ports of entry refer to these units as Advanced Targeting Units, and they are mainly responsible for reviewing incoming persons and cargo shipments that are suspected to be carrying drugs. For example, intelligence officials in these units stated they will review an incoming shipment's manifest by searching for the shipping company in SEACATS to see if the company has prior drug seizures associated with its shipments.[34] If a person or shipment is suspected to have drugs, officials will flag the person or shipment for inspection when it arrives at the port of entry. Additionally, if CBP officers and agents seize drugs from a person or shipment, intelligence officials in these units will review the elements of the seizure scenario to inform their future targeting efforts.

Field targeting and intelligence units also provide the officers and agents at their location with a variety of intelligence products to assist with their targeting efforts. For example, intelligence officials we spoke with at one Border Patrol station stated they create briefing slides for agents by combining seizure data from e3, independent analysis of drug seizure trends such as common countries of origin for drugs, and intelligence information from other entities such as the Drug Enforcement Administration to inform the station's targeting efforts. Additionally, at one port of entry, intelligence officials provide officers with situational awareness alerts on an as-needed basis that describe recent drug seizures in the area, as well as the key indicators that led to the seizure.

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[33]See the list of related GAO products at the end of this report for examples of our previous work on drug seizure targeting and intelligence efforts.

[34]Most cargo-carrying vessels must submit a manifest with information on the shipments to CBP in advance of the cargo arriving at the port of entry, such as what is contained within each shipment. This manifest is what CBP officers and agents review to target shipments for drugs.

CBP Has Various Data Fields for Recording Drug Seizure Data, but Has Not Assessed Its Drug Type Categories

CBP has various categories in its data systems for recording, analyzing, and using data on drug seizures, but has not assessed how it categorizes drug types. In particular, CBP has not assessed its existing drug type categories to determine if they adequately reflect the smuggling scenarios officers and agents encounter, and are useful for targeting and intelligence activities.

Specifically, SEACATS has several data fields that CBP officers and agents use to categorize drug seizures. Some of the fields are mandatory and a CBP officer or agent cannot submit the record to their supervisor for review until those fields are populated. CBP officials we interviewed stated that if an element of the smuggling scenario does not fit into one of the available data fields, they record that element in the seizure narrative. For example, OFO officers at one port of entry stated they use the seizure narrative to provide details on the smuggling scenario, such as what factors led to selecting a person for inspection and how they conducted the inspection to find the drug.

Drug seizure categorization is important because CBP uses the data for targeting and trend monitoring. We reviewed three data fields that CBP intelligence officials stated they use in their targeting and trend monitoring efforts: drug type, conveyance type, and concealment method.[35] We also reviewed the *Concealed in Commodity* data field because CBP officers and agents can use it to describe instances in which drugs are concealed in commodities, such as produce shipments. Based on our analysis of data in these data fields and interviews with headquarters and field officials, two of these fields—conveyance type and concealment method—provided officials with the data and information needed for their targeting and intelligence activities. However, as noted below, CBP has not assessed the categories available under the drug type field to determine if they meet CBP's needs.

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[35]For these three data fields, we analyzed data on drug seizure cases and drug seizures recorded in SEACATS from fiscal years 2016 through 2021—the most recent data available at the time of our review—when OFO, Border Patrol, or AMO was listed as the discovering agency. Furthermore, we assessed e3 data to determine how Border Patrol categorized drug type in statistical samples of drug seizures.

Drug Type

One mandatory data field in SEACATS that CBP officers and agents use to populate a drug seizure record is the drug type field. From fiscal years 2016 through 2021, there were as many as 44 drug type categories available for officers and agents to select. During the time frame of our review, the Office of Information Technology added six drug types into SEACATS.[36] For example, officials told us they added the DMT drug type in May 2020 because CBP's forensic and scientific arm found that this drug was the fourth most-tested substance in February 2020.

One of the 44 drug type categories is a catchall category called *Other drugs, prescriptions, and chemicals* (ODB).[37] The CBP handbook states that CBP officers and agents should only categorize a seized drug as ODB if another specific drug type is not available. According to our analysis of SEACATS data, from fiscal years 2016 through 2021, marijuana and ODB were the top two drug types seized—which represent a combined 51 percent of total drug seizures from this time frame.[38] Figure 5 provides additional details of the types of drugs seized during this time frame.

[36]The CBP Office of Information Technology added DMT in May 2020; amphetamine in January 2021; PCP, tapentadol, and methamphetamine (in solution) in August 2021; and poppy seeds in September 2021.

[37]In April 2022, OFO officials told us they deactivated the ODB drug type in SEACATS and created two new drug type categories that capture other drugs, prescriptions, and chemicals.

[38]We did not analyze drug seizure trends based on the weight of seized drugs.

Figure 5: Number of U.S. Customs and Border Protection (CBP) Drug Seizures by the Top Drug Types by CBP Component, Fiscal Years 2016 through 2021
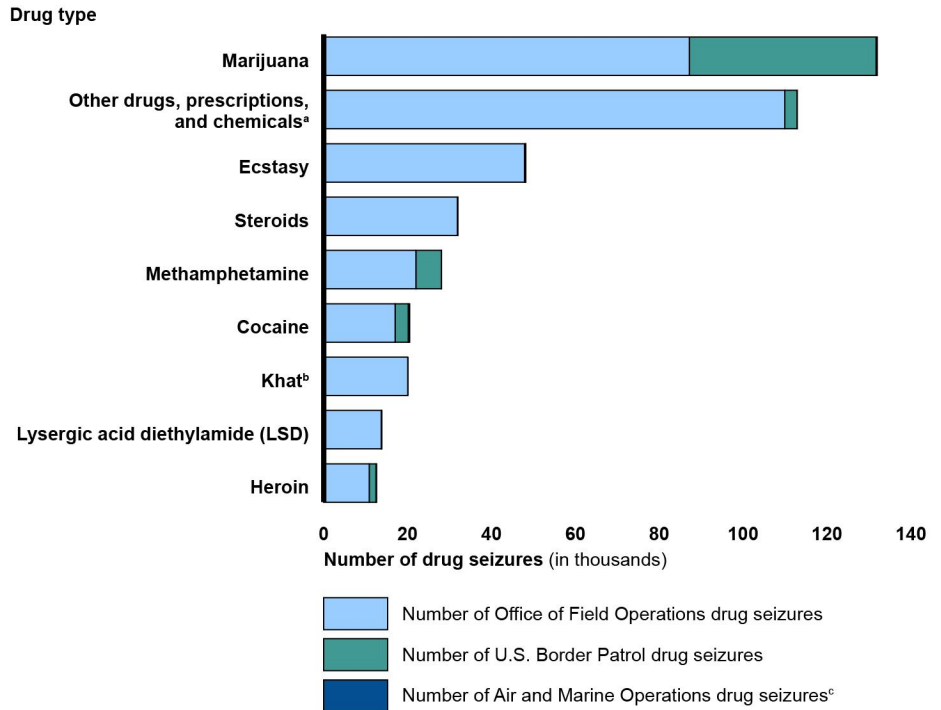
Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Data table for Figure 5: Number of U.S. Customs and Border Protection (CBP) Drug Seizures by the Top Drug Types by CBP Component, Fiscal Years 2016 through 2021

Drug type	Number of OFO drug seizures	Number of Border Patrol drug seizures	Number of AMO drug seizures
Marijuana	87171	44530	290
Other drugs, prescriptions, and chemicals[a]	109953	2891	49
Ecstasy	47860	302	7
Steroids	31873	112	5
Methamphetamine	21991	6061	22
Cocaine	17024	3155	328
Khat[b]	20036	0	0
Lysergic acid diethylamide (LSD)	13708	130	2
Heroin	10854	1626	120

Note: This figure includes drug types that had at least 10,000 drug seizures recorded in SEACATS from fiscal years 2016 through 2021 and collectively represents 87 percent of total CBP drug seizures during this time frame. SEACATS is CBP's official system of record to track drug seizures. SEACATS was formerly the Seized Assets and Case Tracking System. CBP retired the full spelling of this

system in July 2020, and only refers to it as the acronym now. We did not analyze drug seizure trends based on the weight of seized drugs or include drug seizures where CBP components participated in the seizure but did not discover the drug.

[a]According to CBP policy, officers and agents should only categorize a seized drug into the *Other drugs, prescriptions, and chemicals* drug type if a more specific drug type is not available.

[b]Khat is a stimulant harvested from the Khat plant, which is native to East Africa and the Arabian Peninsula.

[c]Air and Marine Operations often serves in a supporting role in CBP drug seizures and is therefore not often responsible for processing and data entry. As a result, the number of Air and Marine Operations drug seizures are approximately 0.2 percent of total CBP drug seizures from fiscal years 2016 through 2021 and therefore may not be visible in this figure.

Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

CBP intelligence officials we spoke with who use and analyze drug seizure data stated that they have some concerns with the drug type categories available in SEACATS, as well as the drug type categories Border Patrol agents have to select in e3, particularly related to the marijuana and ODB categories.[39] For example, intelligence officials specifically noted that SEACATS and e3 do not have fields to record data on the various sub-types of marijuana that exist. Marijuana can come in various sub-types, such as edibles or THC oils and waxes, and this specificity can only be found if officers and agents note such details in the seizure narratives. This is noteworthy because marijuana represents 27 percent of total CBP drug seizures from fiscal years 2016 through 2021. Intelligence officials stated that they are unable to obtain a full picture of marijuana seizures in their analysis because these seizures are not categorized into these more specific sub-types, and each sub-type of marijuana can have its own smuggling trends.

We reviewed a random generalizable sample of 100 SEACATS marijuana seizures from fiscal years 2019 and 2020, and estimate that CBP officers and agents could have categorized 40 percent of the marijuana seizures as a marijuana sub-type if SEACATS had more descriptive drug types available.[40] In addition, we reviewed a random generalizable sample of 100 e3 marijuana seizures to see how Border Patrol categorizes them,

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[39]SEACATS and e3 have different drug type categories. According to senior Border Patrol officials, the difference in drug type categories between SEACATS and e3 exists because there are different reporting requirements for each system.

[40]This estimate had a margin of error of plus or minus 10 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if the marijuana seizure could have been categorized into a more specific marijuana sub-type. For additional information on our methodology, see appendix I.

and we estimate that Border Patrol agents could have categorized 14 percent of the marijuana seizures as a marijuana sub-type in e3.[41]

Further, according to CBP intelligence officials we interviewed, the extensive use of ODB poses a problem for categorizing emerging drug trends and is their primary concern with drug seizure categorization in SEACATS and e3. This category represents 23 percent of total CBP drug seizures from fiscal years 2016 through 2021 in SEACATS. An August 2021 report on the CBP threat landscape stated that there is not enough drug type categorization in SEACATS to assess emerging drug trends such as synthetic drugs.[42] Intelligence officials stated that in order to categorize these drugs, they have to do additional research such as text searches in the seizure narrative field. The officials further stated this research can be difficult because, for example, CBP officers and agents sometimes misspell the drug type in that field which makes it difficult for intelligence officials to identify the drug type while performing a text search.

We reviewed a random generalizable sample of 100 SEACATS ODB seizures from fiscal years 2019 and 2020, and we estimate that CBP officers and agents categorized 96 percent of ODB seizures in accordance with the drug type categories available in SEACATS.[43] However, we identified an example of a potential drug type category CBP could add to SEACATS to increase the precision of its drug type categorization. In particular, we estimate that CBP officers and agents could have categorized 26 percent of the ODB seizures as an opioid or

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[41]This estimate had a margin of error of plus or minus 7 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if the marijuana seizure could have been categorized into a more specific marijuana sub-type.

[42]See CBP Office of Intelligence, *Forecasting the CBP Threat Landscape – Fiscal Year 2022 to Fiscal Year 2027* (August 6, 2021).

[43]For the purposes of our analysis, we defined a drug seizure in our SEACATS ODB sample as "categorized in accordance with the drug type categories available in SEACATS" if there was no other available drug type category other than ODB that could have applied. This estimate had a margin of error of plus or minus 4 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if the description of the seizure matched another drug type category available in SEACATS.

an opioid combination drug, but those drug types are not available in the data system.[44]

Furthermore, while SEACATS has 44 drug type categories available for CBP officers and agents to select, e3 contains 16 categories (including one for ODB) for Border Patrol agents to select. According to senior Border Patrol officials, the difference in drug type categories between SEACATS and e3 exists because there are different reporting requirements for each system. In addition, Border Patrol is the main user of e3, whereas multiple CBP entities and U.S. Immigration and Customs Enforcement use SEACATS, so more data fields, such as additional drug type categories, are available in SEACATS to accommodate the reporting needs of multiple agencies.

We reviewed a random generalizable sample of 83 e3 seizures categorized as ODB from fiscal years 2019 and 2020 to determine if Border Patrol agents selected a more descriptive drug type category (when available) in SEACATS when transferring drug seizures from e3 to SEACATS. We estimate that Border Patrol agents categorized about 46 percent of drug seizures in accordance with the drug type categories available in SEACATS.[45] However, we estimate that Border Patrol agents could have categorized about 24 percent of seizures into a more

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[44]This estimate had a margin of error of plus or minus 9 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if, based on the description, it could have been categorized as an opioid or opioid combination drug (meaning the drug has the presence of an opioid and a non-opioid substance).

[45]For the purposes of our analysis, we defined a drug seizure in our e3 ODB sample as "categorized in accordance with the drug type categories available in SEACATS" if (1) the Border Patrol agent selected a more descriptive drug type available in SEACATS (when applicable), or (2) if ODB was the correct categorization of the drug in both systems because no other available drug type was applicable. This estimate had a margin of error of plus or minus 10 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if the description of the seizure matched another drug type category available in SEACATS.

descriptive drug type in SEACATS than ODB and did not do so.[46] For example, we found examples in our sample of Border Patrol e3 seizures of psilocyn or psilocybin mushrooms that agents categorized as ODB in e3 because there was not a more specific drug type category available. However, agents categorized these same seizures as ODB in SEACATS even though there was a more specific drug type category available in that system. Specifically, SEACATS has a drug type category for psilocyn or psilocybin mushrooms, and according to Border Patrol officials, Border Patrol agents are required to select the most descriptive drug type category available in SEACATS when transferring drug seizures from e3 to SEACATS. These officials stated their agents should not have categorized these mushroom seizures as ODB in SEACATS, as there was a more descriptive category for agents to use and may reflect uncertainty about which categories to use when e3 drug seizures are transferred into SEACATS.

CBP has not assessed if the drug type categories available in its data systems adequately reflect the drug smuggling scenarios encountered by its officers and agents. According to CBP and Border Patrol officials, they add drug types to SEACATS and e3 upon request from the field or in response to a request from Congress to monitor a specific drug type, and they do not often remove drug types from the systems. CBP has not conducted a review to see if the drug type categories available in its systems are sufficient, or if the drug type categories available in both systems are still relevant. For example, from fiscal years 2016 through 2021, there was only one drug seizure recorded under the drug type *Thai sticks* in SEACATS. According to CBP officials, they have not conducted this review because it would require coordination with other DHS entities who use its systems for recordation—such as U.S. Immigration and

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[46]This estimate had a margin of error of plus or minus 9 percentage points at the 95 percent confidence level. We made this estimate by analyzing each free-text drug description in the sample to determine if the description of the seizure matched another drug type category available in SEACATS. We could not match 29 percent of the e3 drug seizures to seizures in SEACATS, which is an estimate that had a margin of error of plus or minus 9 percentage points at the 95 percent confidence level. According to senior Border Patrol officials, this is likely because e3 contains both drug seizures in which Border Patrol was the lead agency and those in which Border Patrol assisted with the seizure. For example, if Border Patrol assisted OFO with a drug seizure, they may record it in e3. However, because it is up to the lead agency to make the SEACATS record, the Border Patrol agent participating in a seizure would not transfer the drug seizure record from e3 to SEACATS and the SEACATS record created by the other law enforcement entity would not be linked to the e3 record.

Customs Enforcement—and would have a cost associated with making updates to the systems.

DHS Directive 139-02 on information quality states that all DHS components disseminating information—including CBP—shall ensure and maximize the quality, objectivity, utility, and integrity of information that it disseminates and shall take appropriate steps to incorporate information quality criteria into the component's information dissemination practices.[47] Additionally, federal internal control standards state management should use quality information to achieve an entity's objectives and internally communicate the necessary quality information to achieve the entity's objectives.[48] Assessing the drug type categories available in CBP data systems to determine if they adequately reflect the drug smuggling scenarios encountered by officers and agents could strengthen the quality of CBP's drug seizure data. While making any updates to CBP's categorizations based on an assessment could have upfront costs, such efforts would yield other benefits, such as reducing the work for CBP intelligence officials in analyzing drug seizure data; allowing for more informed decision making; and helping CBP better inform their drug interdiction efforts, target drug smugglers, and monitor drug seizure trends. This effort could also assist Border Patrol agents when transferring e3 drug seizure records into SEACATS by streamlining and clarifying their data entry process.

Conveyance Type

Conveyance type is another mandatory data field in SEACATS that CBP officers and agents use to populate a drug seizure record. This field reflects the method used to smuggle a drug. According to CBP officials we spoke with in the field, the categories available in SEACATS and e3 to record conveyance type reflect the seizure scenarios CBP officers and agents are encountering. Furthermore, according to CBP intelligence officials we interviewed, the conveyance type data are sufficiently categorized for their targeting and intelligence activities.

From fiscal years 2016 through 2021, there were up to 20 conveyance type categories for CBP officers and agents to select. During the time

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[47]See Department of Homeland Security, *Information Quality,* Directive 139-02, November 21, 2019.

[48]See GAO-14-704G.

frame of our review, the CBP Office of Information Technology added seven conveyance types into SEACATS.[49] From fiscal years 2016 through 2021, we found that mail and automobile were the top two conveyance types used for drugs seized by CBP—which represent a combined 72 percent of total CBP drug seizure cases during this period.[50] Figure 6 provides additional details on the types of conveyances used to smuggle seized drugs during this time frame.

Figure 6: Number of U.S. Customs and Border Protection (CBP) Drug Seizure Cases by the Top Conveyance Types by CBP Component, Fiscal Years 2016 through 2021
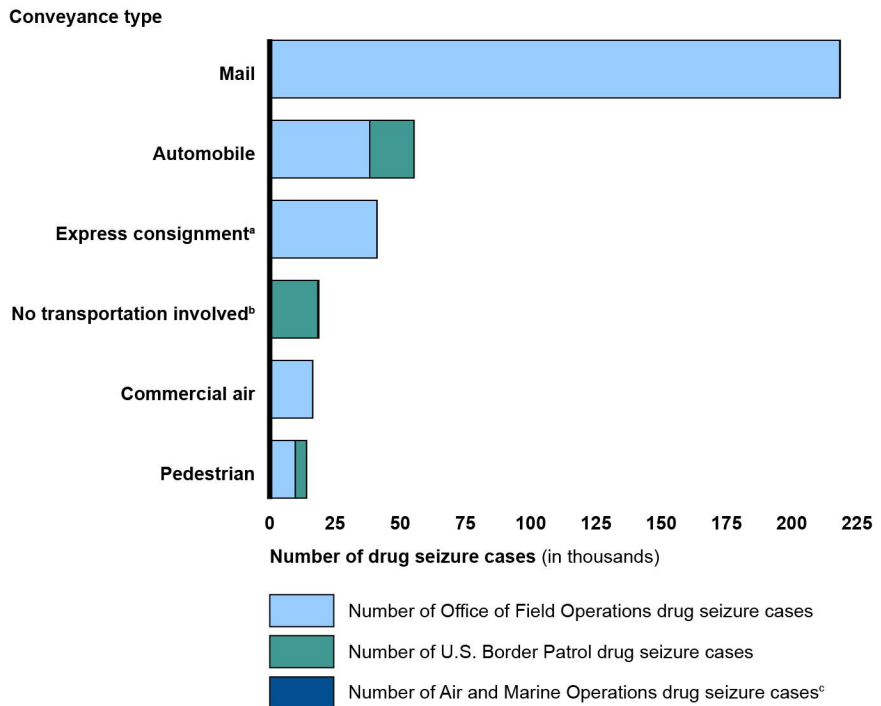
Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

[49]The CBP Office of Information Technology added aircraft, private aircraft, vehicle, vessel, foreign aircraft, rail, and pipeline.

[50]We did not analyze drug seizure case trends based on the weight of seized drugs.

Data table for Figure 6: Number of U.S. Customs and Border Protection (CBP) Drug Seizure Cases by the Top Conveyance Types by CBP Component, Fiscal Years 2016 through 2021

	Number of OFO drug seizures	Number of Border Patrol drug seizures	Number of AMO drug seizures
Mail	218368	173	3
Automobile	38322	16938	31
Express consignment[a]	41042	15	0
No transportation involved[b]	509	17884	457
Commercial air	16462	5	0
Pedestrian	9757	4339	2

Notes: This figure includes conveyance types that had at least 10,000 drug seizure cases recorded in SEACATS from fiscal years 2016 through 2021 and collectively represents 95 percent of total CBP drug seizure cases during this time frame. SEACATS is CBP's official system of record to track drug seizures. SEACATS was formerly the Seized Assets and Case Tracking System. CBP retired the full spelling of this system in July 2020, and only refers to it as the acronym now. We did not analyze drug seizure case trends based on the weight of seized drugs or include drug seizure cases where CBP components participated in the seizure but did not discover the drug.

[a]Express consignment is a package handled by express consignment carriers such as FedEx and the United Parcel Service.

[b]In scenarios where a CBP officer or agent seizes a drug outside of a mode of transportation, such as an abandoned drug, its conveyance type is recorded as *No transportation involved.*

[c]Air and Marine Operations often serves in a supporting role in CBP drug seizures and is therefore not often responsible for processing and data entry. As a result, the number of Air and Marine Operations drug seizure cases are approximately 0.2 percent of total CBP drug seizure cases from fiscal years 2016 through 2021 and therefore may not be visible in this figure.
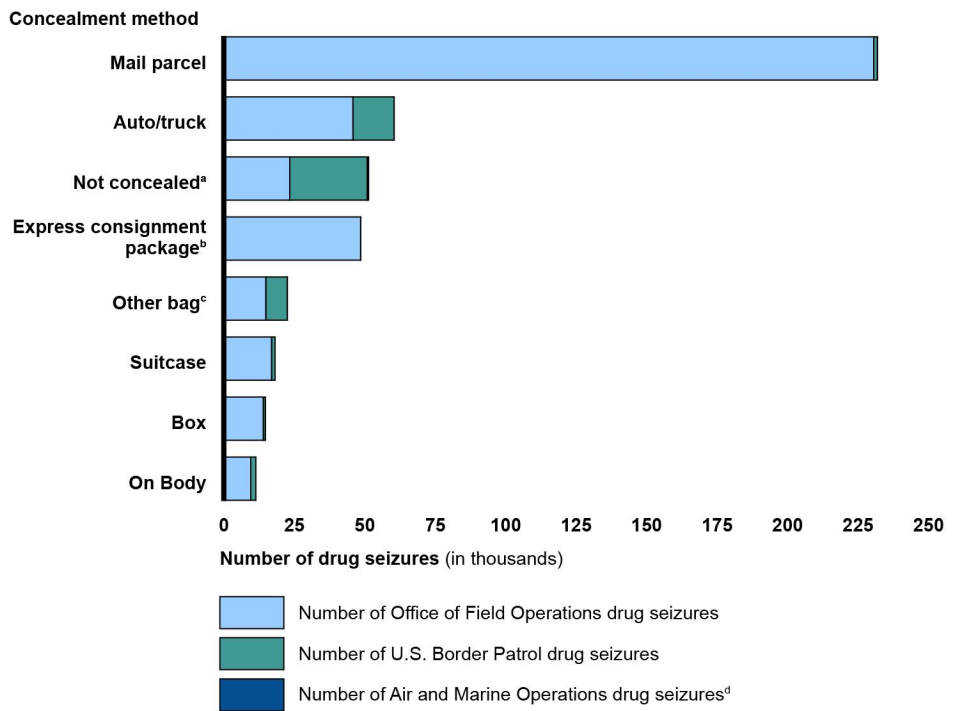
Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Concealment Method

Concealment method is another mandatory data field in SEACATS that CBP officers and agents use to populate a drug seizure record. This field reflects the method used to hide the drug within the conveyance used for smuggling. According to CBP officials we spoke with in the field, the concealment categories available in SEACATS and e3 reflect the seizure scenarios CBP officers and agents are encountering. Furthermore, according to CBP intelligence officials, the concealment method data are sufficiently categorized for their targeting and intelligence activities. From fiscal years 2016 through 2021, there were 19 concealment method categories for CBP officers and agents to select. During the time frame of our review, the CBP Office of Information Technology did not add any concealment methods into SEACATS. According to our analysis, from fiscal years 2016 through 2021, mail parcel and auto/truck were the top

two concealment methods used for drugs seized by CBP—which represent a combined 61 percent of total CBP drug seizures during this period.[51] Figure 7 provides additional details of the methods of concealment used to smuggle seized drugs during this time frame.

Figure 7: Number of U.S. Customs and Border Protection (CBP) Drug Seizures by the Top Concealment Methods by CBP Component, Fiscal Years 2016 through 2021

Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Data table for Figure 7: Number of U.S. Customs and Border Protection (CBP) Drug Seizures by the Top Concealment Methods by CBP Component, Fiscal Years 2016 through 2021

	Number of OFO drug seizures	Number of Border Patrol drug seizures	Number of AMO drug seizures
Mail parcel	230569	1264	6
Auto/truck	45810	14578	22
Not concealed[a]	23365	27444	513
Express consignment package[b]	48532	9	0

[51]We did not analyze drug seizure trends based on the weight of seized drugs.

	Number of OFO drug seizures	Number of Border Patrol drug seizures	Number of AMO drug seizures
Other bag[c]	14872	7607	34
Suitcase	16886	1275	12
Box	13948	757	10
On body	9523	1806	11

Notes: This figure includes concealment methods that had at least 10,000 drug seizures recorded in SEACATS from fiscal years 2016 through 2021 and collectively represents 95 percent of total CBP drug seizures during this time frame. SEACATS is CBP's official system of record to track drug seizures. SEACATS was formerly the Seized Assets and Case Tracking System. CBP retired the full spelling of this system in July 2020, and only refers to it as the acronym now. We did not analyze drug seizure trends based on the weight of seized drugs or include drug seizures where CBP components participated in the seizure but did not discover the drug.

[a]In scenarios where a CBP officer or agent seizes a drug where there is no attempt to hide it, such as sitting out on the seat of a car, its concealment method is recorded as *Not concealed*.

[b]An express consignment package is a package handled by express consignment carriers such as FedEx and the United Parcel Service.

[c]In scenarios where a CBP officer or agent seizes a drug concealed in a bag that is not a box, suitcase, or luggage trunk, its concealment method is recorded as *Other bag*.

[d]Air and Marine Operations often serves in a supporting role in CBP drug seizures and is therefore not often responsible for processing and data entry. As a result, the number of Air and Marine Operations drug seizures are approximately 0.2 percent of total CBP drug seizures from fiscal years 2016 through 2021 and therefore may not be visible in this figure.

Source: GAO analysis of CBP drug seizure data. | GAO-22-104725

Concealed in Commodity Data Field

There is an optional data field in SEACATS—*Concealed in Commodity*—that CBP officers and agents can use to populate a drug seizure record for a drug that was concealed in a commodity, such as produce. When this data field is applicable to the drug seizure scenario and it is populated, CBP Office of Information Technology officials stated it is to reflect the tariff number of the commodity a drug is concealed in and that SEACATS contains over 44,000 tariff numbers from the U.S. International Trade Commission's Harmonized Tariff Schedule. According to these officials, they update the tariff numbers quarterly. CBP Office of Information Technology officials further stated that their office is working to create an automatic transfer process between SEACATS and the Harmonized Tariff Schedule that will provide real-time updates to the tariff numbers in SEACATS, and they are working to complete this effort by the end of calendar year 2022. However, they told us there are some challenges that could affect this date, such as the availability of funding and technology resources.

From fiscal years 2016 through 2021, we found that 98 percent of drug seizures did not have the *Concealed in Commodity* data field populated.[52] According to senior OFO officials, they direct CBP officers and agents to populate this data field only when the tariff number of a commodity is easily accessible at the time of the seizure, such as when the tariff number is included on a bill of lading for a shipment.[53] According to officials, because there are over 44,000 tariff numbers and CBP officers and agents are not trade experts, they would have to contact an import specialist to retrieve the exact tariff number if it was not easily accessible. This coordination could extend the timeline for the SEACATS submission past the 24-hour deadline required by the CBP handbook.

Drug seizures for which the *Concealed in Commodity* data field was populated by CBP officers and agents from fiscal years 2016 through 2021 totaled approximately 9,000 records, or about 2 percent of all drug seizures during that period. We reviewed those records and found that 63 percent of them had an alphabetical code recorded instead of a tariff number. Office of Information Technology officials told us this was a system error, and that officers and agents should not have selected an alphabetical code when populating this data field. We discussed the results of our analysis with these officials and, in response, they deactivated those alphabetical codes in January 2022. As a result, users can no longer select them in SEACATS. This change will help CBP ensure it has more accurate data on drugs concealed in commodities.

[52]Because the *Concealed in Commodity* data field is optional, we were unable to determine if the data field was applicable to the drug seizure scenario and therefore should have been populated by the CBP officer or agent.

[53]A bill of lading provides CBP with detailed information in advance of a shipment arriving at a port of entry. Carriers create bills of lading to describe the goods inside the shipment, the details of the intended voyage, and the conditions of transportation before the shipment arrives in the U.S.

CBP Does Not Evaluate Its Post-Academy Drug Seizure Training

CBP Components Provide a Variety of Drug Seizure Trainings

CBP components provide training on the drug seizure process through required courses, supplemental training activities, and various other resources.

Training courses. Prospective CBP officers and agents are trained at their respective academies on the process for recording drug seizures. Specifically, the Field Operations Academy, the Border Patrol Academy, and the Air and Marine Operations Academy have required courses on the topic during basic training. CBP officers and agents are also trained on the process for recording drug seizures after graduating from an academy. For example, new OFO officers are required to complete the Post-Academy Program and Border Patrol agents are required to complete the National Field Training Program at their first duty station, both of which cover drug seizures.[54] While AMO does not have a required post-academy training program for new agents, they offer an optional drug seizure training course.[55] Table 1 provides details on the academy and post-academy drug seizure courses available for CBP officers and agents.

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[54]We refer collectively to the training that CBP officers and agents receive after graduating from the academy basic training as "post-academy" training. Border Patrol previously had a training program that was also titled the Post-Academy Program that agents participated in concurrently with the National Field Training Program; however, it was cancelled in 2020. According to Border Patrol officials, it was duplicative with training agents receive at the academy. OFO's Workforce and Resiliency Division and Border Patrol's Mission Readiness and Operations Directorate's Recruitment and Training Division design and develop component-specific training on drug seizures.

[55]AMO's Programs, Application, and Data Management Division designs and develops component-specific training on drug seizures.

Table 1: Descriptions of Drug Seizure Trainings Available for U.S. Customs and Border Protection (CBP) Officers and Agents

CBP component	Academy training on drug seizures	Post-academy training on drug seizures
Office of Field Operations (OFO)	Prospective OFO officers are required to take three courses that cover drug seizures at the Field Operations Academy during basic training—(1) a systems overview that covers SEACATS, the official CBP system of record for tracking seized property—including drugs—and processing seizures; (2) a more in-depth overview of SEACATS that includes an exercise for officers to create a drug seizure record and draft a narrative describing the seizure; and (3) the drug seizure process, including timeliness requirements and officer roles and responsibilities throughout the process, as well as a mock drug seizure scenario.[a]	New OFO officers cover drug seizures during one module of the required Post-Academy Program. During the classroom portion of this module, officers cover how to handle seized property (including drugs), make the appropriate notifications, and document the seizure. This module has three versions that are tailored to the type of port of entry where the officer is assigned—(1) land, (2) air and sea, and (3) cargo. In addition to the classroom module, there is on-the-job training on drug seizures in which new officers are paired with experienced officers who are certified to conduct training, referred to as Field Training Officers.[b]
U.S. Border Patrol	Prospective Border Patrol agents are required to take one course at the Border Patrol Academy during basic training that covers drug seizures. The course covers the drug seizure process, agent roles and responsibilities, how to document a drug seizure in e3—an application that Border Patrol uses to collect and transmit data related to law enforcement activities, including drug seizures—and a mock drug seizure scenario.[c]	There is one on-the-job training module on drug seizures during the required National Field Training Program for new Border Patrol agents. New agents work with Field Training Officers to process a drug seizure and document it in e3. According to Border Patrol officials, the exercise can last up to an entire shift depending on the complexity of the seizure and how well the new agent learns the information.
Air and Marine Operations (AMO)	Prospective AMO agents are required to take two courses at the Air and Marine Operations Academy during basic training that cover drug seizures. During these courses, prospective agents review the drug seizure process, including how to record the drug seizures in SEACATS and also cover mock drug seizure scenarios.	AMO does not have any required drug seizure courses for new or experienced agents; however, agents have the option to enroll in an annual course that covers drug seizure data entry in SEACATS.[d]

Source: GAO analysis of CBP information. | GAO-22-104725

[a]SEACATS was formerly the Seized Assets and Case Tracking System, but CBP has since retired the formal name and only uses the acronym.

[b]Field Training Officers are experienced CBP officers and agents who conduct training in the field.

[c]Border Patrol agents first record a drug seizure in e3 before transferring the record to SEACATS.

[d]This course is typically reserved for Tasking, Operations and Management Information System Administrators and Alternates, who are stationed at every AMO branch and are responsible for oversight of the branch's data entry in the Tasking, Operations and Management Information System—the system AMO uses to track mission activities, including drug seizures. According to AMO officials, AMO agents and supervisors have the option to enroll in this course as space allows.

CBP officials we spoke with in the field provided their perspectives on the academy drug seizure training. For example, OFO officers we spoke with at three of the seven ports of entry identified benefits of academy training, including learning from seasoned instructors and gaining a foundation on drug seizure processing. AMO management officials at one of the two branches we spoke with told us that the drug seizure training agents receive at the academy is beneficial, particularly the time the agents spend in the computer lab. However, OFO officers we spoke with at six of

the seven ports of entry identified challenges with academy training, including insufficient training on drug seizure processing steps and limited coverage of SEACATS during the training. In addition, AMO agents we spoke with at one of the two branches stated that agents leaving the academy do not have the confidence to conduct and record drug seizures.[56]

CBP officials also discussed their perspectives on post-academy drug seizure training. All of the field officials we spoke with at the 11 locations mentioned the importance of on-the-job training to learn drug seizure processing and recordation. Such training occurs in OFO and Border Patrol's formal post-academy programs led by Field Training Officers— experienced CBP officers and agents who conduct training in the field. It may also occur through shadowing, when newer officers and agents observe more experienced officers and agents. OFO management officials we spoke with at three of the seven ports of entry discussed benefits of the Post-Academy Program. For example, officials at one port of entry stated the program was an opportunity to provide new officers with port of entry-specific information on drug seizures. OFO officers we spoke with at five of the seven ports of entry identified additional benefits, such as shadowing senior officers. OFO officials also discussed challenges with the program, such as limited opportunities to practice recording SEACATS drug seizure entries and outdated training materials, which we discuss in more detail below.

In addition, Border Patrol officials we spoke with from one of the two stations identified a benefit of the National Field Training Program. The officials said agents are able to learn about drug seizures from trained instructors. However, officials also thought it would be helpful for the National Field Training Program to have more standardized instructions on drug seizure processing, so that all agents learn using the same information. While AMO does not have a formal post-academy program, agents we spoke with from one of the two branches identified the branch's informal, on-the-job shadowing experience as helpful in teaching new agents how to conduct drug seizures.

Supplemental drug seizure training. In addition to the academy and post-academy training courses on drug seizures discussed above, CBP headquarters and field officials may conduct supplemental drug seizure

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[56]As discussed in more detail below, CBP evaluates their academy basic training programs. CBP may capture officer and agent feedback on its drug seizure courses through those evaluation processes.

training as needed. For example, CBP Office of Information Technology officials told us that they have conducted in-person and virtual training on SEACATS when requested by field officials. Border Patrol headquarters officials told us that Border Patrol seized property specialists also occasionally conduct drug seizure process and SEACATS trainings when requested by field officials.

CBP field officials determine how they want to deliver the supplemental training, for example, through verbal briefings or through presentations and lectures. OFO field officials told us they provide supplemental training as needed to share information on new drug seizure policies and procedures, or to provide updates on SEACATS. Border Patrol and AMO field officials also told us they provide supplemental drug seizure training as needed, such as if a drug seizure policy is updated or if agents are experiencing challenges in a particular drug seizure-related area. Officials at one Border Patrol station stated that if there is a significant drug seizure, supervisors will hold a debriefing session with agents on what went well and what areas for improvement exist.

Training resources. CBP headquarters and field officials have also developed a variety of drug seizure training resources to assist officers and agents. CBP's Office of Information Technology developed quick reference guides to assist officers and agents with the recordation process in SEACATS. For example, there is a guide on entering drug seizure information into SEACATS that details the steps in the process and includes screenshots of the key steps. In addition, there is a guide for supervisors on how to review and approve a drug seizure record in SEACATS. These guides, along with announcements from the Office of Information Technology on new system features and functionality, are embedded within SEACATS. Border Patrol also developed a SEACATS user guide tailored to Border Patrol to guide agents through the steps of the recordation process.

OFO, Border Patrol, and AMO field officials provided examples of drug seizure processing and recordation resources. For example, OFO officials we spoke with at six of the seven ports of entry provided one or more examples of drug seizure job aids and tools used to help officers with their drug seizure processing and recordation responsibilities. These job aids and tools included port of entry-developed SEACATS training, seizure to-do checklists, and seizure step-by-step processing guides. Border Patrol and AMO officials we spoke with at the two stations and one branch also shared examples of resources, such as a drug seizure

process flowchart and a collection of prior seizure records used for training purposes.

CBP Does Not Evaluate Its Post-Academy Drug Seizure Training

Evaluation of Academy Training on Drug Seizures

The Field Operations Academy, Border Patrol Academy, and Air and Marine Operations Academy have plans in place to evaluate their basic training programs for prospective officers and agents, which include the aforementioned courses on drug seizures. For example, the three academies prepare various evaluation reports that are outlined in these plans.[57] CBP's Office of Training and Development requires that the academies under its jurisdiction maintain course evaluation plans, conduct regular evaluation activities, and recommend changes based on the results of evaluations.[58]

The three academies evaluate their basic training programs as a whole and not as individual training courses, such as the drug seizure courses. Each academy has its own evaluation guide or plan that expands on the Office of Training and Development policy requirements. For example, the Field Operations Academy policy requires that the academy prepare quarterly and annual reports on the basic training program.[59] While the academies are not evaluating individual courses, they may make changes to drug seizure courses as a result of these basic training program evaluations. For example, the Air and Marine Operations Academy

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[57]For the purposes of our review, we considered training evaluation to be policies and procedures that assess the extent to which the training contributes to improved performance and results. According to our guide for assessing federal training programs, GAO-04-546G, and the Kirkpatrick model—a leading practice in training and development evaluation—training evaluation should assess participant reaction to training; changes in employee skills, knowledge, or abilities as a result of participation; changes in on-the-job behaviors as a result of participation; and impact of training on program or organizational results.

[58]The policy states that any courses funded by the National Training Plan must follow these requirements. The Field Operations Academy, Border Patrol Academy, and Air and Marine Operations Academy are managed by the Office of Training and Development and funded by the National Training Plan. See *Office of Training and Development Evaluation*, OTD.15.001A (Feb 3, 2020).

[59]See *Field Operations Academy Training Evaluation Plan*, FOA.18.004 (Aug. 31, 2018).

conducted a curriculum review in 2020 of its basic training program and revised one of its drug seizure courses to be broken into smaller periods of time over more days of instruction.

Evaluation of Post-Academy Training on Drug Seizures

OFO and Border Patrol post-academy trainings include information on drug seizures, but some of the information is outdated and the agencies have not evaluated or updated these trainings for a number of years.[60]

First, OFO has not evaluated or updated the Post-Academy Program for new officers, which includes a required drug seizures module, since 2011. While Field Training Officers assess individual officers' performance in the drug seizures module, OFO has not evaluated the module itself. Such an evaluation could include reviewing changes in on-the-job behaviors as a result of participation or reviewing the impact of the module or program on organizational results.

In addition, OFO's Post-Academy Program drug seizures module is outdated. For example, one of the three learning objectives is focused on how to document a seizure. However, the training materials provide instructions on a system that is no longer in use and do not mention the modernized SEACATS, which CBP has been using to record drug seizures since May 2018.[61] Further, the list of available CBP presumptive field drug testing devices in the drug seizure module is not current.[62] During the course of our review, OFO headquarters and field officials told us that the program, including the drug seizures module, is outdated. An OFO headquarters official in the division responsible for designing and developing OFO-specific training on drug seizures stated that their office received feedback from field locations that the program is outdated. In addition, OFO officers we spoke with from four of the seven ports of entry discussed challenges with the drug seizure module in the program. Some

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[60]As previously stated, AMO does not have a formal post-academy training program. In addition, AMO often serves in a supporting role in CBP drug seizures and is therefore not often responsible for processing and data entry. As such, we did not review AMO's evaluation process for post-academy drug seizure training.

[61]SEACATS underwent a modernization effort that was completed in May 2018.

[62]CBP uses presumptive field testing devices to test suspected drugs in the field. For additional information on CBP's use of these tests, see GAO-21-286.

officers provided suggested improvements, such as adding coverage of SEACATS and conducting more mock drug seizures.

OFO officials told us that they did not develop a plan to regularly evaluate and update the Post-Academy Program and training modules when they were introduced to the field in 2011.[63] As of February 2022, OFO and Office of Training and Development officials said that they are in process of updating the program and estimated they would complete the update in fiscal year 2022. Specifically, OFO, with assistance from the Office of Training and Development, established a working group of experienced officers and supervisors to update the program and implemented a pilot in a selected field location from October 2021 through January 2022. In January 2022, OFO and Office of Training and Development officials told us that they developed a draft evaluation plan to accompany the updated Post-Academy Program. Officials stated that this evaluation plan has been modeled after the Field Operations Academy evaluation plan for officer basic training.

Second, Border Patrol has not evaluated the National Field Training Program for new agents, which includes a required drug seizures module, since the program was created in 2006. Border Patrol has also not updated the drug seizures module since 2015.[64] While Field Training Officers assess individual agents' performance in the drug seizures module—similar to OFO—Border Patrol has not evaluated the module itself. Such an evaluation could include reviewing changes in on-the-job behaviors as a result of participation or reviewing the impact of the module or program on organizational results.

According to Border Patrol officials in the division responsible for the National Field Training Program, Border Patrol did not develop a plan to regularly evaluate or update the program. Officials we spoke with were not involved in the decision-making process for the National Field Training Program in 2006 and could not speak to why a plan was never put in place. However, they stated that the program, including the drug seizures module, needs to be updated. In 2018, Border Patrol's training

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[63]According to officials, Office of Training and Development officials helped OFO design and develop the Post-Academy program, but it is OFO's responsibility to implement and manage the program.

[64]While OFO's drug seizure module is a course packet, Border Patrol's is a two-page guide with instructions for Field Training Officers on what drug seizure information to cover with new agents.

division officials sent a questionnaire to the nine southwest Border Patrol sectors soliciting feedback on the program.[65] According to these officials, they also established a working group in August 2018 to update the program in which officials used responses from the 2018 survey to help inform program changes. Border Patrol expects to implement the new program in late fiscal year 2022. In January 2022, we discussed our analysis of the training program with Border Patrol officials. They stated that they were in the process of completing the Internal Operating Procedure to accompany the updated National Field Training Program. According to officials, based on the results of our audit work, they planned to incorporate language into the Internal Operating Procedure calling for regular evaluation of the training program. Subsequently, in February 2022, Border Patrol completed the Internal Operating Procedure.

Our guide for assessing federal training programs states that agencies should systematically plan for and evaluate the effectiveness of their training efforts.[66] Specifically, a plan should include the goals of the training program and measures to ascertain progress toward those goals.[67] In addition, federal internal control standards state that agencies should perform ongoing monitoring of programs—such as regularly monitoring training programs through evaluations—to determine program effectiveness.[68] Furthermore, federal law encourages agencies to evaluate their training programs periodically.[69]

We recognize that OFO and Border Patrol are in the process of updating their Post-Academy Program and National Field Training Program (including the drug seizures modules). These are positive steps; however, OFO and Border Patrol have not yet completed and implemented these efforts. For example, OFO did not provide documentation of its draft

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[65]According to Border Patrol, because all new agents are initially assigned to the southwest border, the National Field Training Program is only available at stations in the nine sectors along the southwest border.

[66]See GAO-04-546G.

[67]Border Patrol's 2015 National Field Training Program standard operating procedures also state that Border Patrol should periodically conduct comprehensive reviews that examine feedback, recommendations, and any issues in the National Field Training Program. Border Patrol, *National Field Training Program Standard Operating Procedures*, Version 2.0; Apr. 8, 2015.

[68]See GAO-14-704G.

[69]See, e.g., 5 U.S.C. §§ 4101, 4103.

evaluation plan or provide dates by which it anticipates these efforts will be finalized. Further, Border Patrol finalized the Internal Operating Procedure for its National Field Training Program in February 2022, which includes language about evaluating the program, and subsequently provided it to us in April 2022. Border Patrol officials told us the agency intends to implement it by July 2022. Moreover, because OFO and Border Patrol have not evaluated the programs in years, it is unclear the extent to which the plans will provide for regular evaluation, as called for by federal internal control standards and our prior work. Finalizing and then implementing a plan to regularly evaluate the drug seizures modules of their post-academy training programs would provide OFO and Border Patrol with the data or information needed to determine if the modules are helping to achieve CBP's goals related to drug seizures.[70] In addition, OFO and Border Patrol would be better positioned to receive and implement feedback from the field to ensure that the modules are useful and effective.

Conclusions

CBP has an important role in preventing illicit drugs from entering the U.S.—having recorded about 99,000 drug seizures in fiscal year 2021—and working with other federal agencies to prevent drug importation. CBP has policies and processes that outline how its officers and agents target, seize, and record drugs in CBP data systems. In addition, CBP has various categories for recording, analyzing, and using drug seizure data, including for targeting and intelligence activities. However, CBP has not assessed if the drug type categories available in its systems adequately reflect the drug smuggling scenarios encountered by CBP officers and agents, and if they are useful for targeting and intelligence. Assessing the drug type categories available in CBP's data systems could strengthen the quality of its drug seizure data and could yield other benefits, such as helping CBP better target illicit drugs and monitor trends.

CBP also provides a variety of drug seizure training to its officers and agents, including during basic training at the academy, during post-academy programs, and on an as-needed basis. However, OFO and Border Patrol have not evaluated their post-academy drug seizure

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[70]According to CBP officials, drug seizure training courses help support CBP goals and mission priorities, such as combatting transnational crime and securing the border, as outlined in CBP's strategic plan. See, *U.S. Customs and Border Protection Strategy 2021-2026,* Publication No. 1280-1220*,* December 2020.

training. Finalizing and implementing a plan to regularly evaluate their post-academy drug seizure training would provide OFO and Border Patrol with the insights to determine if their training is helping to achieve agency goals related to drug seizures.

Recommendations for Executive Action

We are making the following three recommendations, one to CBP, one to OFO, and one to Border Patrol:

- The Commissioner of CBP should assess the drug type categories available in its data systems to determine if they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents. (Recommendation 1)

- The Executive Assistant Commissioner of OFO should finalize and implement a plan to regularly evaluate the drug seizures portion of the Post-Academy Program. (Recommendation 2)

- The Chief of Border Patrol should finalize and implement a plan to regularly evaluate the drug seizures portion of the National Field Training Program. (Recommendation 3)

Agency Comments and Our Evaluation

We provided a draft of this product to DHS for review and comment. DHS provided comments, which are reproduced in full in appendix II and discussed below. DHS also provided technical comments, which we incorporated as appropriate.

In its comments, DHS concurred with our three recommendations and described actions planned to address them.

In response to our first recommendation that the Commissioner of CBP assess the drug type categories available in its data systems, DHS stated that OFO plans to review and assess those categories to ensure that they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents. Further, DHS stated the CBP Office of Information Technology will plan to update the data systems, as appropriate.

With regard to our second recommendation that the Executive Assistant Commissioner of OFO finalize and implement a plan to regularly evaluate

the drug seizures portion of the Post-Academy Program, DHS stated that the CBP Field Operations Academy is in the process of revising the CBP Officer Post-Academy Training Program. This revision will include a plan to regularly evaluate the drug seizures portions of the program.

With regard to our third recommendation that the Chief of Border Patrol finalize and implement a plan to regularly evaluate the drug seizures portion of the National Field Training Program, during the agency comment period, Border Patrol provided its finalized Internal Operating Procedure related to the National Field Training Program, which includes language about evaluating the program, and requested that the recommendation be closed as implemented. While issuing the Internal Operating Procedure is an important first step, it does not fully address our recommendation, as Border Patrol has not yet implemented the procedure. We will monitor Border Patrol's efforts to determine if they fully address our recommendation.

We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, this report is available at no charge on the GAO website at http://www.gao.gov.

If you or your staff have any questions, please contact me at (202) 512-8777 or gamblerr@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made significant contributions to this report are listed in appendix III.

Rebecca Gambler
Director, Homeland Security and Justice

List of Requesters

The Honorable John Katko
Ranking Member
Committee on Homeland Security
House of Representatives

The Honorable Clay Higgins
Ranking Member
Subcommittee on Border Security, Facilitation, and Operations
Committee on Homeland Security
House of Representatives

The Honorable Carlos Gimenez
Ranking Member
Subcommittee on Transportation and Maritime Security
Committee on Homeland Security
House of Representatives

The Honorable Mike Rogers
House of Representatives

Appendix I: Objectives, Scope, and Methodology

This report addresses the following objectives:

1. How does U.S. Customs and Border Protection (CBP) collect and categorize drug seizure data in its systems and monitor trends in drug seizures?

2. To what extent does CBP train its officers and agents on the process for recording drug seizures and evaluate its training?

To address both objectives, we interviewed officials via teleconference at a nongeneralizable sample of 11 CBP field locations—Office of Field Operations (OFO) ports of entry, U.S. Border Patrol stations, and Air and Marine Operations (AMO) branches.

*   For the ports of entry and Border Patrol stations, we selected locations with varying numbers of drug seizures, emphasizing locations with the greatest number of drug seizures recorded in SEACATS from fiscal years 2016 through 2020.[1] In selecting the seven ports of entry, we included a variety of air, land, and sea ports of entry—including locations where OFO inspects international mail and express cargo—across a variety of field offices to represent geographic diversity. We also considered, among other things, ports of entry with the greatest number of land border crossings from calendar year 2016 through 2020 and greatest value of imported goods, including produce, from calendar year 2016 through January 2021. In selecting the two Border Patrol stations, we included stations that varied in geographic location and that have immigration checkpoints, as many of Border Patrol's drug seizures occur at checkpoints.

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[1]These were the most recent data available at the time of our selection. SEACATS is the official system of record for all CBP drug seizures, and was formerly known as the Seized Assets and Case Tracking System. CBP retired the full spelling of this system in July 2020, and only refers to it as the acronym now. SEACATS underwent a modernization effort that was completed in May 2018. According to CBP Office of Information Technology officials, this modernization did not affect the data we used in our review. We used SEACATS drug seizure data obtained during our review on CBP's presumptive field testing to select our OFO and Border Patrol locations, see GAO, *Border Security: CBP Has Taken Actions to Help Ensure Timely and Accurate Field Testing of Suspected Illicit Drugs*, GAO-21-286 (Washington, D.C.: Apr. 26, 2021).

- For the AMO branches, we selected locations from among those with the greatest number of drug seizures from fiscal year 2016 through March 2021 using summary drug seizure data from AMO's Tasking, Operations, and Management Information System. In selecting the two AMO branches, we included branches that varied in geographic location and prioritized those in which AMO was the lead CBP agency responsible for the drug seizures, as AMO has primary responsibility for drug seizure recordation in SEACATS when it is lead CBP agency.

For each location, we conducted two teleconferences: one with management, supervisors, and data specialists and a second with available officers and agents who are responsible for initial drug seizure recordation and who would have participated in drug seizure training.[2] While the information we obtained from these interviews at selected field locations cannot be generalized to all CBP locations, the interviews provide a range of valuable perspectives and experiences regarding CBP's drug seizure recordation process and training.

To address our first objective, we identified and analyzed CBP's policies, procedures, and other documentation that outline the drug seizure and recordation process. These include, for example, the *Seized Asset Management and Enforcement Procedures Handbook* (which contains the official CBP-wide policies and procedures for drug seizures) and field-specific guidance documents and resources.[3] We also interviewed CBP officials in headquarters—such as those from OFO Fines, Penalties, and Forfeitures Division and Border Patrol's Asset Forfeiture Program—and in the 11 field locations. The officials provided us with perspectives on how CBP developed and updated the policies and procedures, and requirements in these documents specifically related to seizing drugs and recording seizures in CBP data systems. They also discussed any challenges they faced when seizing drugs and recording data. We assessed CBP's policies and procedures for the drug seizure and recordation process against the control activities component of the *Standards for Internal Control in the Federal Government*—management should design control activities to achieve objectives and respond to

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[2]At the Border Patrol stations, in lieu of speaking with Border Patrol agents, we spoke with first-line supervisors who directly oversee a group of Border Patrol agents and are responsible for oversight of their drug seizure processing and recordation.

[3]See CBP*, Seized Asset Management and Enforcement Procedures Handbook* (July 2011).

risks.[4] Furthermore, we assessed the mechanisms CBP headquarters
and field officials have to perform quality assurance reviews on drug
seizure records. This included, among other things, looking at summary
data and reports from the CBP Self-Inspection Program from the 2016
through 2021 cycles for OFO and from the 2016 through 2020 cycles for
Border Patrol.[5]

To describe how CBP monitors drug seizure trends, we reviewed drug
seizure-related products intelligence entities prepare to assist with their
targeting efforts, such as standard operating procedures and situational
awareness alerts. We also interviewed knowledgeable officials from
OFO's National Targeting Center and CBP's Office of Intelligence, as well
as the CBP field targeting and intelligence units at all 11 locations we
selected.

We also analyzed data on drug seizure cases and drug seizures recorded
in CBP's SEACATS system from fiscal years 2016 through 2021, the
most recent data available at the time of our review.[6] Specifically, we
analyzed the number of CBP drug seizure cases and drug seizures by
CBP component (OFO, Border Patrol, and AMO) when the component
was listed as the discovering agency. We also analyzed data for this
same time period on drug type seized, conveyance type, concealment
method, and whether drugs were concealed in commodities. To assess
the reliability of these data, we reviewed related documentation (such as
data dictionaries and user manuals); interviewed agency officials

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[4]See GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G
(Washington, D.C.: Sept. 2014).

[5]The CBP Self-Inspection Program is an annual internal review, whereby management
completes worksheets to assess compliance with CBP policies and procedures. The
review cycle is from February through January each year.

[6]We analyzed data from SEACATS because it is the official system of record for tracking
all CBP drug seizures, and all OFO, Border Patrol, and AMO seizures are to be tracked
using this system. SEACATS data on drug seizures are collected at multiple levels: (1)
When a CBP officer or agent seizes one or multiple drugs from one or multiple offenders,
the entire incident is referred to as a drug seizure event. (2) Within a drug seizure event,
there may be one or multiple drug seizure cases. In our analysis, we define a "drug
seizure case" as one offender (such as an individual person or business) associated with
the drug seizure event. (3) Within a drug seizure case, there may be one or multiple types
of drugs seized. In our analysis, we define a "drug seizure" as each individual drug type
seized within a drug seizure case. For example, if during an inspection, CBP officers
seized drugs from two individual offenders, we considered that as two "drug seizure
cases" in our analysis. If the officers seized two types of drugs from each offender, we
considered that as four "drug seizures" in our analysis.

responsible for managing the systems, including CBP's Office of
Information Technology; interviewed end users of the drug seizure data,
including OFO, Border Patrol, and AMO officers and agents; and
performed electronic testing to identify any errors or omissions. We found
these data to be sufficiently reliable for the purposes of presenting overall
trends in drug seizure cases and drug seizures.

We also drew four random generalizable samples from fiscal years 2019
and 2020 to examine how CBP officers and agents categorize certain
drug types using the drug type categories available in SEACATS and
Border Patrol's e3—an application that Border Patrol uses to collect and
transmit data related to its law enforcement activities, including drug
seizures.[7] We selected these samples from two specific drug type
categories used by CBP in SEACATS and e3—namely *Marijuana* and
Other drugs, prescriptions, and chemicals (ODB)—because they were the
top two drug types seized during the time frame of our review.[8] All
estimates are presented in the report along with their margins of error at
the 95 percent confidence level. For all four probability samples, each
drug seizure record that was part of the SEACATS and e3 data we
obtained from CBP and Border Patrol had a nonzero probability of being
included, and that probability could be computed for any record.
Additionally, each sample record that was selected for our four samples
was subsequently weighted in each analysis to account statistically for all

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[7]We analyzed data from SEACATS because it is the official system of record for tracking
all CBP drug seizures, and all OFO, Border Patrol, and AMO seizures are to be tracked
using this system. We also assessed e3 data to determine how Border Patrol categorized
drug type in statistical samples of drug seizure records. Border Patrol uses e3 to transfer
information into SEACATS. Specifically, a Border Patrol agent first records a drug seizure
in e3. Using an automatic transfer button in e3, they then merge the relevant information
into SEACATS via a one-time transfer process. Border Patrol also uses e3 for other
operational purposes, such as public reporting of drug seizure data. To assess the
reliability of e3 data, we reviewed related documentation (such as user manuals);
interviewed agency officials responsible for managing the systems; interviewed end users
of the drug seizure data; and performed electronic testing to identify any errors or
omissions. We found these data to be sufficiently reliable for the purposes of drawing e3
drug seizure data for our probability sample analyses. We used data from fiscal years
2019 and 2020 because these were the most recent two fiscal years of data available at
the time we drew our statistical samples that took place after the SEACATS modernization
in May 2018. AMO agents also track mission activities, including drug seizures, in the
Tasking, Operations and Management Information System, but there is no automatic
transfer process between SEACATS and this system.

[8]In addition, CBP intelligence officials who review drug seizure data for targeting and trend
monitoring efforts told us they have concerns with these particular drug type categories in
CBP data systems, which we discuss in more detail in this report.

of the records in the SEACATS and e3 data we obtained, including those that were not selected. We performed the following analyses on the probability samples we drew:[9]

- **Probability sample 1.** For the first sample, we drew a random generalizable sample of 100 of the 46,386 drug seizure records from SEACATS that were categorized as the drug type marijuana where a CBP component was listed as the discovering agency in fiscal years 2019 and 2020. We then reviewed the 100 SEACATS marijuana drug seizure records to determine if CBP officers and agents could have categorized the record into a more specific marijuana sub-type, such as an edible or THC cartridge. The team conducted this review by analyzing each free-text drug description recorded by CBP officers and agents to determine if the marijuana seizure could have been categorized into the more specific sub-type.

- **Probability sample 2.** For the second sample, we drew a random generalizable sample of 100 of the 11,757 drug seizure records from e3 that were categorized as the drug type marijuana in fiscal years 2019 and 2020. We then reviewed the 100 e3 marijuana drug seizure records to determine if Border Patrol agents could have categorized the record into a more specific marijuana sub-type, such as an edible or THC cartridge. The team conducted this review by analyzing each free-text drug description recorded by Border Patrol agents to determine if the marijuana seizure could have been categorized into the more specific sub-type.

- **Probability sample 3.** For the third sample, we drew a random generalizable sample of 100 of 39,361 drug seizure records from SEACATS that were categorized as the drug type ODB where a CBP component was listed as the discovering agency in fiscal years 2019 and 2020. We then reviewed the 100 SEACATS ODB drug seizure records to determine if CBP officers and agents categorized the record in accordance with the drug type categories available in SEACATS. For the purposes of our analysis, we defined a drug seizure in our SEACATS ODB sample as "categorized in accordance with the drug type categories available in SEACATS" if there was no other available drug type category other than ODB that could have applied. The team conducted this review by analyzing each free-text drug description recorded by CBP officers and agents to determine if

[9]Unless otherwise noted, for each analysis, one analyst made the initial assessment and another analyst verified the result. If there were differences in their assessments, these were reconciled through discussion between the two analysts and a final determination was made.

the description of the seizure matched another drug type category available in SEACATS.

Further, we reviewed the 100 SEACATS ODB drug seizure records to determine if there were opportunities for further categorization. Specifically, we analyzed if CBP officers and agents could have categorized the ODB record as an opioid or opioid combination drug (meaning the drug has the presence of an opioid and a non-opioid substance). The team researched each free-text drug description recorded by CBP officers and agents to determine if it was an opioid or opioid combination drug. One GAO nurse consultant reviewed these designations to ensure they were correct, and another nurse consultant verified the result.

- **Probability sample 4.** For the fourth sample, we drew a random generalizable sample of 83 of the 578 drug seizure records from e3 that were categorized as the drug type ODB in fiscal years 2019 and 2020. We reviewed the 83 e3 ODB drug seizure records to determine if, when automatically transferring the drug seizure information into SEACATS, Border Patrol agents categorized the record in accordance with the most descriptive drug type category available in SEACATS. For the purposes of our analysis, we defined a drug seizure in our e3 ODB sample as "categorized in accordance with the drug type categories available in SEACATS" if (1) the Border Patrol agent selected a more descriptive drug type available in SEACATS (when applicable), or (2) if ODB was the correct categorization of the drug in both systems because no other available drug type was applicable. We conducted this review by analyzing each free-text drug description recorded by Border Patrol agents in e3, matching the e3 record to the parallel record in the fiscal years 2019 through 2020 SEACATS data we obtained for this review, and seeing if the Border Patrol seizure in SEACATS was more specifically categorized into another drug type category available in SEACATS (when applicable).

The information and communication component of federal internal control standards was significant to this portion of the objective, specifically the principles that (1) management should use quality information to achieve the entity's objectives, and (2) management should internally communicate the necessary quality information to achieve the entity's objectives.[10] We also used DHS Directive 139-02 on information quality to review what steps CBP took to incorporate information quality criteria into

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[10]See GAO-14-704G.

its drug seizure dissemination of drug seizure data.[11] We assessed the
quality and communication of CBP's drug seizure data in SEACATS and
e3 against these internal control standards and directive. Furthermore, we
reviewed actions CBP took to remedy the *Concealed in Commodity* data
field as a result of our findings that there were inconsistencies in the data.

To address our second objective on the extent to which CBP trains its
officers and agents on the process for recording drug seizures, we
reviewed agency documentation related to CBP's academy and post-
academy drug seizure training efforts.[12] This documentation included
training policies and procedures, training course guides and slide decks,
training tools and job aids for officers and agents, and supplemental
training materials. We interviewed officials in CBP's Office of Training and
Development—including officials from the Field Operations Academy, the
Border Patrol Academy, and the Air and Marine Operations Academy—as
well as officials from OFO's Workforce and Resiliency Division, Border
Patrol's Mission Readiness and Operations Directorate's Recruitment and
Training Division, and AMO to identify actions they have taken related to
the drug seizure training design, development, implementation, and
evaluation process. We also interviewed CBP officials at the 11 field
locations to obtain their perspectives on the benefits and challenges of
drug seizure training.

The control environment and control activities components of federal
internal control standards were significant to this portion of the objective.
Specifically, we assessed CBP's training efforts against the principles that
(1) management should demonstrate a commitment to competence,
specifically the recruitment, development, and retention of competent
individuals; and (2) management should design appropriate types of
control activities for the internal control system, such as human capital
management. For example, management should design training to

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[11]See Department of Homeland Security, *Information Quality*, Directive 139-02, November
21, 2019.

[12]Prospective CBP officers and agents receive training at their respective academy—the
Field Operations Academy for OFO officers, the Border Patrol Academy for Border Patrol
agents, and the Air and Marine Operations Academy for AMO agents. CBP officers and
agents are also trained on the process for recording drug seizures after graduating from
the academy, which we refer to as post-academy training.

develop and retain employee knowledge, skills, and abilities to meet changing organizational needs.[13]

To examine the extent to which CBP evaluates its drug seizure training, we reviewed CBP and component-specific policies and plans related to training evaluation and interviewed officials responsible for evaluating CBP training. We assessed CBP's training evaluation efforts against our guide for assessing federal training programs to review what steps CBP took to systematically plan for and evaluate the effectiveness of its training efforts.[14] We also assessed CBP's efforts against relevant federal laws and CBP standard operating procedures for administering post-academy training programs.[15] Furthermore, we assessed CBP's training evaluation efforts against the monitoring component of federal internal control standards—specifically the principle that management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.[16]

We conducted this performance audit from February 2021 through May 2022 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.

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[13]See GAO-14-704G.

[14]See GAO, *Human Capital: A Guide for Assessing Strategic Training and Development Efforts in the Federal Government,* GAO-04-546G, (Washington, D.C.: Mar. 2004). For the purposes of our review, we considered training evaluation to be policies and procedures that assess the extent to which the training contributes to improved performance and results. According to our guide and the Kirkpatrick model—a leading practice in training and development evaluation—training evaluation should assess participant reaction to training; changes in employee skills, knowledge, or abilities as a result of participation; changes in on-the-job behaviors as a result of participation; and impact of training on program or organizational results.

[15]See, e.g., 5 U.S.C. §§ 4101, 4103, and Border Patrol, *National Field Training Program Standard Operating Procedures*, Version 2.0; Apr. 8, 2015.

[16]See GAO-14-704G.

Appendix II: Comments from the Department of Homeland Security

Homeland
Security

April 21, 2022

Rebecca Gambler
Director, Homeland Security and Justice
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-104725, "BORDER
       SECURITY: CBP Could Improve How It Categorizes Drug Seizure Data and
       Evaluates Training"

Dear Ms. Gambler,

Thank you for the opportunity to comment on this draft report. The U.S. Department of
Homeland Security (DHS or the Department) appreciates the U.S. Government
Accountability Office's (GAO) work in planning and conducting its review and issuing
this report.

The Department is pleased to note GAO's recognition that, U.S. Customs and Border
Protection (CBP) efforts to prevent illicit drugs from entering the U.S. resulted in an
increase in the number of CBP drug seizures from about 65,000 in fiscal year (FY) 2016
to about 99,000 in FY 2021. CBP conducts numerous activities in service of the mission
to protect the American people, safeguard our borders, and enhance the nation's
economic prosperity. This includes facilitating the flow of legitimate travel and trade at
our nation's borders and keeping terrorists and their weapons, criminals, and their
contraband, and inadmissible noncitizens out of the country. As such, CBP performs an
important role in the nation's efforts to prevent drug misuse, which includes the use of
illicit drugs and the misuse of prescription drugs. CBP remains committed to working
with other federal agencies to prevent entry of illicit drugs, restricted precursor
chemicals, and other such goods into the United States.

The draft report contained three recommendations with which the Department concurs.
Enclosed, please find our detailed response to each recommendation. DHS previously
submitted technical comments addressing several accuracy, contextual, and other issues
under a separate cover for GAO'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.

Sincerely,

JIM H
CRUMPACKER

Digitally signed by JIM H
CRUMPACKER
Date: 2022.04.21 12:52:58 -04'00'

JIM H. CRUMPACKER, CIA, CFE
Director
Departmental GAO-OIG Liaison Office

Enclosure

2

**Enclosure: Management Response to Recommendations
Contained in GAO-22-104725**

GAO recommended that the CBP Commissioner:

Recommendation 1: Assess the drug type categories available in its data systems to determine if they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents.

Response: Concur. CBP Office of Field Operations (OFO) will review and assess the drug type categories available in its data systems to ensure that they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents. As part of this effort, CBP OFO will work with the CBP Office of Information Technology to update the data systems, as appropriate. Estimated Completion Date (ECD): September 30, 2022.

GAO recommended that the OFO Executive Assistant Commissioner:

Recommendation 2: Finalize and implement a plan to regularly evaluate the drug seizures portion of the Post-Academy Program.

Response: Concur. The CBP Field Operations Academy is in the process of revising the CBP Officer Post-Academy Training Program. This revision includes a plan to regularly evaluate the drug seizures portions of the Post-Academy Training Program. Post-Academy Training Program evaluations of material will be conducted in accordance with the currently approved "Field Operations Academy Training Evaluation Plan," FOA.18.004A, dated August 17, 2021. Final implementation of the Post-Academy Training Program and its evaluation plan are currently being negotiated with the National Treasury Employees Union, and will be implemented once bargaining obligations are met. ECD: September 30, 2022.

GAO recommended that the U.S. Border Patrol (USBP) Chief:

Recommendation 3: Finalize and implement a plan to regularly evaluate the drug seizures portion of the National Field Training Program [NFTP].

Response: Concur. On February 23, 2022, USBP finalized its Internal Operating Procedure (IOP) for the USBP Headquarters Recruitment and Training Division NFTP Field Training Unit (FTU), "NFTP FTU IOP 2020," 21-39011. Section 5.1.4 of the IOP gives the NFTP Coordinator the authority to continuously monitor, evaluate, and update all aspects of the NFTP FTU, to include drug seizures training. Accordingly, as new training requirements arise, or current training becomes outdated, the programs will be reviewed and updated on a consistent, recurring basis.

DHS requests that GAO consider this recommendation resolved and closed, as implemented.

3

Text of Appendix II: Comments from the Department of Homeland Security

April 21, 2022

Rebecca Gambler

Director, Homeland Security and Justice

U.S. Government Accountability Office 441 G Street, NW

Washington, DC 20548

Re: Management Response to Draft Report GAO-22-104725, "BORDER SECURITY: CBP Could Improve How It Categorizes Drug Seizure Data and Evaluates Training"

Dear Ms. Gambler,

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or the Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

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The draft report contained three recommendations with which the Department concurs. Enclosed, please find our detailed response to each recommendation. DHS previously submitted technical comments addressing several accuracy, contextual, and other issues under a separate cover for GAO'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.

Sincerely,

JIM H. CRUMPACKER, CIA, CFE

Director

Departmental GAO-OIG Liaison Office

Enclosure

Enclosure: Management Response to Recommendations Contained in GAO-22-104725

GAO recommended that the CBP Commissioner:

<u>Recommendation 1: Assess the drug type categories available in its data systems to determine if they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents.</u>

Response: Concur. CBP Office of Field Operations (OFO) will review and assess the drug type categories available in its data systems to ensure that they adequately reflect the drug smuggling scenarios encountered by CBP officers and agents. As part of this effort, CBP OFO will work with the CBP Office of Information Technology to update the data systems, as appropriate. Estimated Completion Date (ECD): September 30, 2022.

GAO recommended that the OFO Executive Assistant Commissioner:

<u>Recommendation 2: Finalize and implement a plan to regularly evaluate the drug seizures portion of the Post-Academy Program.</u>

Response: Concur. The CBP Field Operations Academy is in the process of revising the CBP Officer Post-Academy Training Program. This revision includes a plan to regularly evaluate the drug seizures portions of the Post-Academy Training Program. Post- Academy Training Program evaluations of material will be conducted in accordance with the currently approved "Field Operations Academy Training Evaluation Plan,"

FOA.18.004A, dated August 17, 2021. Final implementation of the Post-Academy
Training Program and its evaluation plan are currently being negotiated with the
National Treasury Employees Union, and will be implemented once bargaining
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Recommendation 3: Finalize and implement a plan to regularly evaluate the
drug seizures portion of the National Field Training Program [NFTP].

Response: Concur. On February 23, 2022, USBP finalized its Internal Operating
Procedure (IOP) for the USBP Headquarters Recruitment and Training Division
NFTP Field Training Unit (FTU), "NFTP FTU IOP 2020," 21-39011. Section 5.1.4 of
the IOP gives the NFTP Coordinator the authority to continuously monitor, evaluate,
and update all aspects of the NFTP FTU, to include drug seizures training.
Accordingly, as new training requirements arise, or current training becomes
outdated, the programs will be reviewed and updated on a consistent, recurring
basis.

DHS requests that GAO consider this recommendation resolved and closed, as
implemented.

Appendix III: GAO Contact and Staff Acknowledgements

GAO Contact

Rebecca Gambler at (202) 512-8777 or gamblerr@gao.gov

Staff Acknowledgements

In addition to the contact named above, E. Jeanette Henriquez (Assistant Director), Natalie Swabb (Analyst-in-Charge), Carla Brown, Kelsey M. Carpenter, Michele Fejfar, Justin Fisher, Eric Hauswirth, Heidi Nielson, Minette Richardson, and Adam Vogt made key contributions to this report.

Related GAO Products

Border Security Metrics: Progress Made, but DHS Should Take Additional Steps to Improve Information Quality. GAO-22-104651. Washington, D.C.: November 16, 2021.

Border Security: CBP Has Taken Actions to Help Ensure Timely and Accurate Field Testing of Suspected Illicit Drugs. GAO-21-286. Washington, D.C.: April 26, 2021.

Synthetic Opioids: Considerations for the Class-Wide Scheduling of Fentanyl-Related Substances. GAO-21-499. Washington, D.C.: April 12, 2021.

High-Risk Series: Dedicated Leadership Needed to Address Limited Progress in Most High-Risk Areas. GAO-21-119SP. Washington, D.C.: March 2, 2021.

Drug Misuse: Sustained National Efforts Are Necessary for Prevention, Response, and Recovery. GAO-20-474. Washington, D.C.: March 26, 2020.

Land Ports of Entry: CBP Should Update Policies and Enhance Analysis of Inspections. GAO-19-658. Washington, D.C.: August 6, 2019.

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Customs and Border Protection: Improved Planning Needed to Strengthen Trade Enforcement. GAO-17-618. Washington, D.C.: June 12, 2017.

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Supply Chain Security: CBP Needs to Enhance Its Guidance and Oversight of High-Risk Maritime Cargo Shipments. GAO-15-294. Washington, D.C., January 27, 2015.

Combating Nuclear Smuggling: Risk-Informed Covert Assessments and Oversight of Corrective Actions Could Strengthen Capabilities at the Border. GAO-14-826. Washington, D.C.: September 22, 2014.

Congressional Relations

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