INTERNATIONAL AIR PASSENGERS

Staffing Model for Airport Inspections Personnel Can Be Improved
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What GAO Found

The amount of time passengers from international locations have to wait before completing CBP inspections to enter the United States varies within and across airports. On average, CBP processed passengers within 45 minutes during the 2-month period for which data were available, although some flights had significantly longer wait times. Based on our observations and analysis as well as our discussions with airport and CBP officials, we determined that the primary factors affecting wait time are passenger volume, the number of inspection stations available at an airport, and the number of CBP officers available to conduct inspections. These factors, in different combinations at each airport, affect passenger wait times.

Three of the five international airports we visited had built new or expanded federal inspection facilities to accommodate future growth in passenger volume and minimize wait times for internationally arriving passengers. Additionally, some airports assigned staff to assist passengers in preparing documentation to minimize wait times. Airline officials we spoke to acknowledged that large volumes of arriving passengers may increase wait times, but said that, to accommodate market demand, airlines do not spread flight arrivals throughout the day.

CBP, in its efforts to minimize passenger wait times at airports, has taken steps to increase the efficient use of existing staff at airports. For example, CBP is cross-training its officers so that they can conduct different types of inspections. CBP is also developing a staffing model to allocate staff among its ports. However, the new model fails to address weaknesses identified in assessments of staffing models used previously by Customs and INS, such as not including wait times as a performance measure. CBP also has not developed milestones for completing its staffing model and cross-training activities. Until these weaknesses are addressed, CBP will be hampered in forming a basis for management decision-making concerning staff allocation and staff needs and providing budget justifications.

What GAO Recommends

GAO is recommending that CBP address weaknesses in its staffing model, and determine milestones for the completion of its staffing model and cross-training activities.
Figure 5: Percentage of Individual Flights with Wait Times Exceeding 60 Minutes for Primary Passenger Inspection from January 10, 2005, to March 31, 2005, Arranged from Lowest to Highest Average Wait Times

Figure 6: Average Daily Wait Times at 20 International Airports Arranged from Lowest to Highest Annual Passenger Volume from January 10, 2005, to March 31, 2005

Figure 7: Average Daily Wait Times at 20 International Airports Arranged from the Lowest to Greatest Number of Inspection Stations from January 10, 2005, to March 31, 2005

Figure 8: Average Daily Wait Times at 20 International Airports Arranged from Lowest to Highest CBP Staffing Levels

Figure 9: Old Inspection Facilities at George Bush Intercontinental Airport

Figure 10: New Inspection Facilities at George Bush Intercontinental Airport

Figure 11: Daily International Passenger Volume by Hour at Hartsfield Atlanta Airport, May 13, 2005

Abbreviations

CBP: Customs and Border Protection
DFO: Director of Field Operations
DHS: Department of Homeland Security
INS: former Immigration and Naturalization Service
US VISIT: U.S. Visitor and Immigrant Status Indicator Technology

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July 15, 2005

The Honorable John N. Hostettler  
Chairman  
The Honorable Sheila Jackson Lee  
Ranking Minority Member  
Subcommittee on Immigration, Border Security and Claims  
Committee on the Judiciary  
House of Representatives

Every person entering the United States must be inspected to ensure he or she is entering the country lawfully, and in fiscal year 2004, the federal government spent over $1 billion inspecting air travelers. That year, approximately 78 million passengers wishing to enter the United States were inspected at 285 international airports. About 75 percent of these passengers, or about 59 million, were inspected at 20 of these airports. Since September 11, 2001, the federal government has emphasized the need to thoroughly inspect all international passengers so that terrorists do not enter the country. U.S. Customs and Border Protection (CBP) is charged with inspecting these international passengers to prevent terrorists and terrorists weapons from entering the country while fulfilling its mission to foster the nation’s economic security through facilitation of lawful international trade and travel. One way CBP fosters travel is by processing international passengers through airport inspections in a timely manner. If the inspections process impedes the flow of individuals through the airport, then commerce and tourism could be adversely affected.

The amount of time international passengers wait in line to complete airport inspection was an area of concern for the former Immigration and

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1 All international passengers are subject to a primary inspection, during which a CBP officer inspects identity and travel documents, such as passports and visas, to determine their validity and authenticity.

2 Under the Homeland Security Act of 2002, border inspection functions of a number of agencies, including the Immigration and Naturalization Service, the U.S. Customs Service, and the Department of Agriculture were transferred to the DHS. P.L. 207-296, §402. CBP is responsible for carrying out these functions, such as passenger and cargo inspections. The primary authorities for conducting inspections at the border include 8 U.S.C §1225; 19 U.S.C. §§1467, 1581, 1582; and the statutes specified in §421 of the HSA relating to agricultural immigration activities.
Naturalization Service (INS) and U.S. Customs Service (Customs). Shortly after its creation in March 2003 through the combination of the inspections functions from INS, U.S. Department of Agriculture (Agriculture), and Customs, CBP began developing a new staff allocation model to help ensure that inspections facilities, such as those at airports, are adequately staffed to inspect international passengers.

To assess CBP’s efforts to minimize wait times for international air passengers while ensuring security, we answered the following questions:
1) What are the wait times at the 20 U.S. international airports that receive most of the international traffic and what factors affect wait times? 2) What steps have airports and airlines taken to minimize passenger wait times? 3) How has CBP managed staffing to minimize wait times across airports?

To determine wait times for international air passengers, we analyzed CBP data on the wait times at the 20 U.S. airports that receive most of the international traffic.\(^3\) Because the reliability of CBP wait time data is significant to the findings of this review, we evaluated the agency’s internal controls and determined that the required data elements are sufficiently reliable for the purpose of this review. To determine the factors affecting wait times, we analyzed and observed the inspections process and interviewed CBP officials responsible for port management and certain airport and airline officials involved with international passenger processing. To determine the steps airports and airlines have taken to speed passenger processing, we judgmentally selected and visited five international airports based on their unique characteristics and geographic dispersion.\(^4\) We interviewed airport and airline officials who were involved in international-passenger processing and observed the inspection facilities at the five airports we visited to compare capacities and constraints to passenger processing. To assess how CBP has managed staffing to minimize wait times across airports, we interviewed CBP officials at headquarters and from the five selected airports we visited. We also reviewed documentation on CBP’s activities for allocating staff to

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\(^3\) CBP collects wait time data for 21 airports, including one seasonal airport—Orlando Sanford in Florida. For the purposes of this report, we did not include Orlando Sanford in our analysis.

\(^4\) We visited Washington Dulles International Airport, Baltimore-Washington Thurgood Marshall International Airport, Hartsfield-Jackson Atlanta International Airport, Dallas-Fort Worth International Airport, and Houston George Bush Intercontinental Airport.
ports and spoke with agency officials responsible for planning and implementing a staffing model to be used to help manage staff. We reviewed our prior work and that of the Department of Justice Inspector General on previous models used by Customs and INS.

We performed our work from October 2004 to June 2005 in accordance with generally accepted government auditing standards.

Results in Brief

The amount of time passengers from international locations have to wait before entering the United States varies within and across 20 airports at which CBP records wait times. CBP calculates wait time as the time needed to process 98 percent of passengers on an individual flight through primary inspection. Although wait times vary across airports, on average, CBP processed passengers within 45 minutes during the period for which data were available. Nonetheless, CBP has recorded wait times for individual flights as long as 5 hours within a single airport and 15 of the 20 airports had multiple flights that exceeded 60 minutes for processing international passengers through primary inspection. Based on our analysis and observations of the inspections process and discussions with airport and CBP officials, we determined that the primary factors affecting wait time are passenger volume, the number of inspection stations available at an airport, and the number of CBP officers available to conduct inspections. However, none of these factors, in isolation, necessarily determines how long passengers must wait to complete primary inspection.

Some airports and airlines expanded facilities to facilitate projected increases in passenger volume and minimize passenger wait times. For example, three of the five international airports we visited, built, or plan to build, additional inspection stations since 2004. In locations where airport inspections facilities were expanded, airport and airline officials said that increasing the number of stations has helped to reduce wait times, particularly when additional staff were made available. Additionally, at four of the five airports we visited, airport management or airlines have assigned staff to assist passengers in preparing documentation while waiting in line. This preparation helped to prevent delays caused when passengers are turned away from the inspections station due to incomplete or incorrect documentation. Airline officials at the airports we visited said that large volumes of arriving passengers may increase wait times, but to accommodate market demand, airlines do not spread flight arrivals evenly throughout the day.
CBP has taken steps to increase management flexibility in assigning staff to inspection functions and improve staff allocation in an effort to minimize passenger wait times and ensure the most efficient use of existing staff. For example, at some airports, facility managers have arranged staff work schedules and used overtime to maximize the number of staff conducting inspections during peak periods. CBP has introduced its “One Face at the Border” program to increase staffing flexibility so that staff can conduct different types of inspections within airports. CBP plans to provide training materials to all ports to support this program; however, CBP has not established milestones for staff to complete the training at all ports. CBP is also developing a national staffing model to more systematically allocate existing staff levels at airports nationwide, however, the model does not address weaknesses identified in Customs’ and INS’ staffing models in our and the Department of Justice Inspector General’s previous audit work. Specifically, the new staffing model as currently planned (1) does not include wait times as a performance measure; (2) will not include field input on a regular basis in determining appropriate staffing levels; and (3) will not be used to assess optimal staffing levels at airports. Agency officials told us that the model was to be completed by April of 2005, however as of June 2005, it had not been finished and CBP officials had not established milestones for completing and implementing the model.

To help ensure that wait times are minimized and that staff are used as efficiently as possible, we are recommending that the Secretary of Homeland Security direct the Commissioner of Customs and Border Protection to modify CBP’s staffing model plans to better identify personnel needs and capacities to deal with varying passenger volume and to establish milestones for ports to complete its One Face at the Border training program.

We provided a draft of this report to the Secretary of the Department of Homeland Security and the Commissioner of Customs and Border Protection. The Department concurred with three of the recommendations and partially concurred with the remaining two recommendations and said that CBP planned to, or already had taken, steps to implement all five of the recommendations. With regard to the two recommendations with partial concurrence, the Department said that CBP agreed in concept with the need to take action but believes further consideration is needed. Nonetheless, we continue to believe that our recommendations, if implemented, will help CBP to maximize the effectiveness of its staffing allocation process.
Background

CBP has two priority missions: (1) detecting and preventing terrorists and terrorist weapons from entering the United States, and (2) facilitating the orderly and efficient flow of legitimate trade and travel. CBP’s supporting missions include interdicting illegal drugs and other contraband; apprehending individuals who are attempting to enter the United States illegally; inspecting inbound and outbound people, vehicles, and cargo; enforcing all laws of the United States at the border; protecting U.S. agricultural and economic interests from harmful pests and diseases; regulating and facilitating international trade; collecting import duties; and enforcing U.S. trade laws.

There are 317 official ports of entry into the United States. Each port can be composed of one or more individual facilities, such as airports, seaports, or land ports where CBP officers process arriving passengers. The port of Buffalo, New York, for example, has airport, seaport, and land port inspection facilities while the Port of Detroit has only the facility at the Detroit International Airport. CBP headquarters allocates staff to ports. A Director of Field Operations (DFO) is responsible for port activities within a geographic area and serves as a liaison between port management and headquarters. Within ports with multiple port facilities (that may be spread across a wide area), port directors decide whether officers are assigned to airport, sea port or land port facilities and individual facility managers are responsible for overseeing day-to-day operations. Port directors are also responsible for ensuring that officers are appropriately cross-trained to support the agency’s mission and to allow for flexibility in assigning officers to various inspections functions and locations within a port. Figure 1 shows the Port of Houston/Galveston’s multiple sea ports and one airport.

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All port directors report to a DFO who operates at one of 20 Offices of Field Operations.
At inspection facilities within airports, CBP officers inspect all international passengers wishing to enter the United States mainly to determine their admissibility into the country. Figure 2 shows inspection stations within the inspection facility at Dallas-Fort Worth International Airport in Dallas, Texas.
After entering the inspection area, U.S. citizens (or permanent residents) and foreign nationals are directed to two different lines. Foreign national inspections are more complex than U.S. citizen inspections because the inspecting officer has to be familiar with different nations’ passports and visas and be able to identify fraudulent versions of these documents. In addition, foreign nationals must present the I-94 Form. During this process, the officer asks the foreign national passenger questions, such as his or her residence abroad and while in the United States, and intended length of stay. Generally, CBP takes longer to inspect foreign nationals than U.S. citizens or permanent residents.

In addition to questioning the passenger and examining documentation, the officer observes the passenger’s behavior as part of his or her assessment of the passenger’s potential involvement in terrorism, criminal activities, or violation of immigration status. The officer also checks records in a variety of databases as well as any relevant and available...
intelligence information\textsuperscript{7} to identify high-risk passengers. If the CBP officer conducting the primary inspection decides that a passenger requires further scrutiny, then that passenger is referred to another CBP officer who conducts a more in-depth secondary inspection. Secondary inspection can involve additional interviews, document reviews, database queries, communication with other law enforcement agencies, observational techniques, and heightened physical inspections.

After primary or secondary inspection, passengers may be subject to baggage inspection if they have items to declare, such as certain food items or currency or if a CBP officer suspects that they may be involved in illegal activity. Otherwise, if the inspecting officer determines passengers have nothing to declare and do not pose a risk, passengers are allowed to pick up their baggage and leave the inspection facility through the exit control area, where a CBP officer ensures that all passengers have undergone all necessary examinations. In any inspection, if the officer determines that certain passengers pose some risk, are engaged in illegal activity, or are otherwise trying to enter the country unlawfully, they may be returned to their originating country or detained for further legal proceedings.

CBP calculates average daily wait times for an airport based on an average of the wait times of all flights that arrive on that day. Because it is an average, this calculation does not represent the wait times for each individual flight. In addition, the wait time recorded for an individual flight does not represent the amount of time that each individual passenger must wait for primary inspection. CBP calculates passenger wait time for individual flights as the time elapsed from the arrival of the first passenger on a flight into the inspection facility to the completion of primary inspection for 98 percent of the passengers on the flight.\textsuperscript{8} For example, on a flight that CBP records as having a wait time of 45 minutes, the first passenger to enter the inspection facility may be able to pass

\textsuperscript{7} Intelligence is provided to CBP by the National Targeting Center, the Federal Bureau of Investigation, the Department of State and local, state, and federal law enforcement agencies.

\textsuperscript{8} Wait time for an individual flight is not an average wait for all passengers. It is a measure of how long it takes for 98 percent of passengers to complete primary inspection. If the time between primary inspections of passengers on the same flight exceeds some amount, such as 10 minutes, port officials have discretion to end the measurement of wait time for that flight because the latter passenger may have some disability or other reason for falling behind other passengers.
through the primary inspection area in less than 10 minutes, while the last 2 percent of passengers may wait more than an hour, because they arrived later to the inspection facility or were mixed in line with other flights. Figure 3 illustrates the steps arriving passengers take after they deplane until they exit the federal inspection facility and highlights the components of this process that CBP measures as passenger wait times.

Figure 3: Components of Wait Time Calculated by CBP as Part of the Inspection Process

Source: GAO analysis of CBP data.
As illustrated in the figure, the wait time CBP calculates for primary passenger inspection is divided into two components: (1) the time spent waiting in line at the inspection facility and (2) the length of time of the primary inspection. This measurement is focused on primary inspection and does not include the time for passengers to deplane and walk to the inspection area before the primary inspection and also does not include the time needed for passengers to retrieve baggage and exit the inspection facility after the primary inspection. In addition, this measurement does not take into account time passengers may have to spend in secondary inspection.

Prior to September 11, Congress had imposed wait time standards on the INS for processing international passengers. Congress enacted legislation in 1990 requiring INS to process incoming international passengers within 45 minutes. Although the legislation was not specific as to how INS should measure the 45 minutes, INS originally interpreted this requirement to include time spent in line in the inspections facility and the time for primary inspection—the two components measured by CBP. The Enhanced Border Security and Visa Protection Act of 2002 repealed the 45-minute standard as a requirement for processing international passengers. It added a provision requiring that staffing levels estimated by CBP in workforce staffing models be based on a goal of providing immigration services within 45 minutes.

The amount of time passengers from international locations have to wait before completing CBP inspections to enter the United States varies within individual airports and across the 20 airports at which CBP records wait times. Although wait times vary across airports, on average, CBP processed passengers within 45 minutes during the 2-month period for which data were available. Nonetheless, within a single airport, CBP has recorded wait times for individual flights as long as 5 hours for passengers to complete primary airport inspections and 15 of the 20 airports had one percent or more of their international flights exceed 60 minutes for processing international passengers through primary inspection. Based on our observations and analysis of wait time data, as well as our discussions with airport and airline officials, we concluded that the primary factors

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affecting wait time are passenger volume, the number of inspection stations available at an airport, and the number of CBP officers available to conduct inspections. However, none of the three factors, in isolation, had a decisive effect on passenger wait times.

In January 2005, CBP began using its current methodology for recording average daily wait times for international arriving flights at 20 of the 285 airports that receive international air traffic. This calculation is an average of the wait times of all flights that come in that day. Because it is an average, this calculation does not represent the wait time for each individual flight. In addition, the wait time recorded for an individual flight does not represent the amount of time that each individual passenger must wait for primary inspection. For example, on a flight that CBP records as having a wait time of 45 minutes, the first passenger to enter the inspection facility may be able to pass through the primary inspection area in less than 10 minutes while the last 2 percent of passengers may wait more than an hour because they arrived later to the inspection facility or were mixed in line with other flights. Figure 4 illustrates average daily wait times at 20 international airports based on the average time required for the 98th percentile passenger to complete primary inspection at each airport (this applies to figures 4 through 8) and shows that average wait times at 19 of the 20 airports for which CBP maintained data were 40 minutes or less. Airline officials we spoke to cautioned that this data on wait times was not recorded during the peak June through September time periods. The officials stated that wait times recorded during the summer months may be significantly higher than those recorded during off-peak periods.

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<th>Wait Times at Airports</th>
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Generally, the longer of the two components of wait time calculated by CBP is the time spent by passengers waiting in line to meet with a CBP officer. According to CBP officials and our own observations, the time spent by the passenger in the primary inspection station communicating directly with the CBP officer is rarely more than 5 minutes, with inspections for U.S. citizens lasting approximately 1 to 2 minutes and for foreign nationals from 3 to 5 minutes. CBP officials told us that if the officer conducting the primary inspection thinks it is taking an unreasonable amount of time given the nature of the inspection and the capacity of the secondary inspection area, he or she will refer the passenger to secondary inspection to allow for a more thorough examination of the passenger without unnecessarily holding up other travelers.

While the Enhanced Border Security and Visa Protection Act removed the 45 minute standard as a requirement for processing international passengers through inspection, it added a provision specifying that staffing
levels estimated by CBP in workforce models be based upon the goal of providing immigrations services within 45 minutes. As shown in the figure above, only Miami International Airport has an average wait time of over 45 minutes. However, Miami and other airports do sometimes exceed 60 minutes for processing international passengers through primary inspection and CBP maintains data on these flights. Figure 5 illustrates the percentage of flights that exceed 60 minutes for processing international passengers at 20 airports where CBP records wait times.

As figure 5 shows, at one airport, Miami, more than 20 percent of flights exceeded 60 minutes to process passengers through primary inspection while less than one percent of flights arriving at other airports, such as Baltimore-Washington International Airport, Minneapolis-St. Paul International Airport, Phoenix Sky Harbor Airport, and Seattle-Tacoma International Airport exceeded 60 minutes during that time frame.
Based on our analysis and observations, along with a general consensus among CBP, airport, and airline officials, we determined that the primary factors affecting wait time are passenger volume, the number of inspection stations available at an airport, and the number of CBP officers available to conduct inspections. Wait times can also be affected by other factors such as the use of information technology. However, none of these three factors, in isolation, directly impacts passenger wait times across airports due to the variability of numerous other factors that influence wait time at airports, such as passengers’ countries of origin and airport configuration.

Passenger volume is a primary factor that affects wait time for passengers at airports because large volumes of passengers can lead to more crowded inspection facilities and longer lines. Passenger volume can vary by the time of day, day of the week, or time of year. For example, according to airline officials, international passengers tend to travel early or late in the day to accommodate work schedules. Also they said international travel tends to be higher on Monday and Friday than other days of the week, which concentrates passenger volume at certain times of day and days of the week. Airline officials also told us that people tend to travel more during the summer and over holidays which can lead to more crowded inspection facilities and increased wait times during the vacation season. An airport official said flights that exceed 60 minutes for processing generally arrive during these peak passenger volume periods. Figure 6 illustrates average wait times at airports arranged from lowest to highest passenger volume.
Although passenger volume is a factor in wait times, it does not directly correlate with wait times. For example, Dallas-Fort Worth and Newark airports had about the same average daily wait times while Newark had almost twice the passenger volume. Other factors, such as the number of inspection stations or CBP officers on duty, also affect wait times. According to CBP and airline officials, the number of passengers who can be processed within a given time period may be limited by the number of inspection stations available or open at some airports. For example, if an airport has all of its inspection stations in use by CBP officers, adding more officers will have little effect on the number of passengers who can be processed within a given time. Figure 7 lists average wait times at airports arranged from the lowest to greatest number of inspection stations.
As shown in the figure, the number of inspection stations also does not necessarily impact wait times directly. For example, although average wait times at Boston’s Logan Airport are about the same as for Atlanta’s Hartsfield-Jackson Airport, Hartsfield-Jackson Airport has about five times the number of inspection stations as Logan Airport.

The number of CBP staff available to perform primary inspections is also a primary factor that affects wait times at airports. According to CBP officials, the agency strives to place sufficient numbers of officers to fulfill its missions of preventing terrorism and facilitating trade and travel, and part of facilitating trade and travel involves minimizing wait times.

Source: GAO analysis of CBP data.

Note: The inspection stations may or may not be fully staffed.
Figure 8 illustrates average wait times arranged from lowest to highest CBP staffing levels at 20 airports where CBP records wait time data.

As figures 7, 8, and 9 illustrate, no single factor necessarily has a direct impact on passenger wait times across airports; however, varying combinations of the factors within an individual airport may have an effect. For example, CBP and airline officials in Houston stated that the increase in the number of inspection stations at George Bush Intercontinental Airport, in combination with the addition of new CBP officers has reduced passenger wait times.

Information technology systems used during the inspection process to help CBP officers determine admissibility can potentially affect passenger wait times. These systems can occasionally slow down passenger processing when one or more systems become unavailable for any length of time. Because CBP has procedures in place to continue inspections
while the system is brought back online, officials said that this is not a major factor affecting wait times. The officials added that system
downtime did not occur frequently or for extended periods. The main system used by CBP officers to process all passengers is the Interagency Border Inspection System, which is designed to facilitate and more effectively control entry of persons into the United States by providing information on passengers’ identities through querying a variety of databases. The Interagency Border Inspection System assists CBP officers in passenger processing and records the results of secondary inspections. The U.S. Visitor and Immigrant Status Indicator Technology (US VISIT) program is another system used by CBP to help the officer verify passenger identity. Although wait time data kept by CBP does not capture the period prior to the introduction of the US VISIT program, our analysis of available data and discussions with CBP and airline officials indicate that the program has not significantly increased wait times since the procedures associated with the system are generally done concurrently with the CBP officers’ other inspection activities.

Some airports and airlines took steps to facilitate future increases in passenger volume and minimize passenger wait times. Specifically, three of the five international airports we visited had built new or expanded federal inspection facilities to accommodate future growth in passenger volume and minimize wait times for internationally arriving passengers. Additionally, three of these airports assigned staff to assist passengers in preparing documentation to minimize wait times. Airline officials we spoke to acknowledged that large volumes of arriving passengers may increase wait times, but said that, to accommodate market demand, airlines do not spread flight arrivals evenly throughout the day.

According to airport and CBP officials, facility upgrades that increase the number of inspection stations help to minimize passenger wait times by allowing for the more rapid and efficient processing of passengers through inspection facilities. We visited three airports where airports facilities had been upgraded to increase the number of inspection stations and improve configuration of the inspection facility. For example, in 2004 a total of 12 new CBP inspection stations were constructed at Washington Dulles Airport. Airport and airline officials there said that increasing the number of stations has helped reduce wait times because passengers can now pass through the facility more easily. However, the benefit of adding inspection
stations has been limited because, as of June 2003, CBP had not increased staffing levels. However we were not able to verify this because of limited data availability. According to airline officials, to fully maximize the benefit of new or expanded inspections facilities, the number of inspections personnel would need to be increased so that new inspection stations could be staffed.

Construction of new terminals and inspection facilities has also taken place at the George Bush Intercontinental Airport in Houston. In Houston, the airport authority financed the construction of a new inspection facility, which opened in January 2005 and increased the number of inspection stations from 34 to 80. Airport, airline, and CBP officials agreed that the new facility, in combination with an increase in officer staffing levels, has reduced wait times at the airport. They stated that this is because the new inspection facility can more easily accommodate the increased passenger volume at the airport and the larger number of CBP officers allows more inspection stations to be used to process international passengers during peak periods. The new inspection facility at Dallas-Fort Worth Airport is scheduled for completion in July 2005 and will increase the number of inspection stations from 30 to 60. Airport officials stated that they expect that the new facility will help to minimize wait times because it will consolidate inspections activities in one area, whereas current facilities divide inspection activities among three separate terminals. Figures 9 and 10 compare the old and new inspection facilities at George Bush Intercontinental Airport in Houston, Texas.
Houston’s new facility addresses one of the three factors that could facilitate faster processing of international passengers by increasing the number of inspection stations. The overall construction of the new facility shows a more expansive configuration than the old facility. According to airline and CBP officials, the new facility can accommodate a larger number of passengers.
According to airport and airline officials, the new inspection facilities at three of the five airports we visited were constructed to increase capacity to accommodate current and projected passenger volume and planning for them began years in advance and, in the case of federal inspection facilities, were approved by CBP or its legacy agencies in advance. CBP is responsible for reviewing and approving design proposals for inspections facilities to ensure that they meet the agency’s security requirements. In each case, the airports or airlines conducted studies estimating future passenger volume to justify the cost of constructing these facilities. For example, the total cost of the new facility in Houston was approximately $440 million, according to airport officials. Airport and airline officials said that these projects were planned, funded, and completed with the expectation that CBP would increase staff for the new facilities as passenger volume increased. However, CBP officials stated that the agency is not legally or contractually required to allocate new staff when inspection facilities are constructed or expanded and the agency is to make no commitment implicitly or explicitly regarding future staffing levels in approving new inspection facility design proposals.

Airports and airlines also have taken other steps to minimize passenger wait times. For example, at four of the five airports we visited, airport and airline officials stationed personnel in the inspection facility area to assist passengers in filling out required forms such as the I-94 Forms as they wait in line for primary inspection. According to airline officials, this assistance helps to reduce delays caused when passengers are turned away from the primary inspections stations due to incompletely or incorrectly filled out forms. Airport officials at one airport placed Internet terminals in the inspection area to allow passengers to search for address information required for the I-94 form.

CBP and airline officials we spoke with said that scheduling large numbers of flights within a short time period, known as “peaking,” could cause longer passenger wait times. According to airport and airline officials, up to half of an airport’s daily volume may arrive within a few hours. For example, as figure 10 shows, over half of the daily international passenger volume at Atlanta Hartsfield Airport arrives between 1:00 p.m. and 5:00 p.m.
Airline officials said that market demand and international travel patterns largely determine flight schedules, as follows. Passengers generally leave their city of origin early in the morning or later in the evening in order to work a full day at their destination. To deal with this market demand for flights, airlines schedule their flights in clusters referred to as “banks” that follow these business dynamics. Consequently, they said they have little flexibility to spread out flight schedules and still meet passenger demand for travel times. For example, flights leaving western Europe in the morning generally arrive at eastern U.S. airports between 11 a.m. and 4 p.m. In addition, according to airport officials, passengers prefer arriving during this time frame because it allows them to make connecting flights to other U.S. destinations.
CBP has taken steps to increase management flexibility in staffing officers to various inspections functions and to improve the allocation of existing staff in an effort to minimize international passenger wait times and ensure that staff are being used as efficiently as possible. For example, at some airports, facility managers have arranged staff work schedules and used overtime to maximize the number of staff conducting inspections during peak periods. CBP’s One Face at the Border training program is designed to train staff to perform different inspection functions to increase staffing flexibility, but CBP has not established milestones for completing the training. CBP is also developing a national staffing model to help in allocating staff across ports and airports nationwide; however, the model does not address weaknesses in Customs and INS models identified in our and the Department of Justice Inspector General’s previous audit work. Agency officials told us that the model was to be completed by April of 2005. However, as of June 2005, it had not been finished and CBP officials had not established milestones for completing and implementing the model.

CBP has taken advantage of existing staffing flexibility to help minimize passenger wait times. For example, CBP facility managers told us that they plan their officer work shifts so that the most officers available are working during peak hours. When the number of officers available to be assigned during peak time shifts is inadequate for passenger processing, the port director or CBP airport manager may use overtime by asking officers to come in early or stay late. Overtime is the most common tool management uses to address increases in passenger volume.

CBP has not, however, established targets or milestones—such as having a certain percentage of staff cross-trained by a set date—for port directors to complete its One Face at the Border program to allow for greater flexibility in assigning officers to various functions and locations within airports. In July 2003, CBP began a cross-training effort, One Face at the Border, to integrate the former inspections workforces of Customs, INS, and Agriculture. The intent of this effort was to train legacy Customs inspectors to perform “historical” INS and agricultural inspection activities (such as processing passengers at primary inspection and screening for restricted food items) and for legacy INS inspectors to perform “historical” Customs and agricultural inspection activities (e.g., inspecting passenger baggage) in order to create a unified inspection force and a single primary processing point at ports of entry. The officials told us that this effort would allow officers to perform different inspection functions within airports as well as across different facilities. In certain instances where
facilities are located geographically close to one another, inspections officers may be transferred to different facilities within a port to accommodate workload changes. For example, CBP officials at the port of Baltimore told us that officers are stationed at the airport during peak volume periods to inspect air passengers and may be moved to the seaport at other times. Managers may also move cross-trained officers among the various inspection functions performed within a specific port facility. For example, two CBP port directors told us that during peak volume periods, they may move officers from baggage or secondary inspection to primary inspection stations, although some airport and airline officials said this may actually increase wait time for passengers picking up baggage or passing through exit control.

As of June 2005, CBP had developed and delivered some of the training materials for the One Face at the Border program to all ports and expects to develop and deliver all remaining training materials by the end of 2005. CBP officials said this program is essential for increasing staff flexibility so that staff can conduct different types of inspections within airports. However, CBP officials said it could take a number of years for officers nationwide to complete all required training. While CBP monitors the progress of each port in completing its required training, it has not established milestones for when ports should complete the training program or goals for having some percentage of staff complete the training. Milestones for completing this training program would help CBP to assess progress in implementing the program and determine when managers would be able to allocate officers within their port to areas of greatest need. They would also provide a basis to hold responsible officials accountable for implementing the training program. Without milestones for measuring the implementation status of its cross-training program, CBP has no assurance that port directors have the flexibility needed to allocate officers within and among facilities as efficiently as possible.

CBP Management Does Not Allocate Staff to Ports Systematically

CBP does not systematically assess the number of staff required to accomplish its mission at ports or airports nationwide or assure that officers are allocated to airports with greatest need. CBP’s current approach to allocating officers does not determine the optimal use of CBP inspection staff across all ports. Rather, it assumes the overall allocations are static, and relies on port directors to determine the number of staff necessary to accomplish CBP’s mission at airports and other port facilities within their purview.
In instances where port directors identify a need for additional staff, for example due to a projected increase in international passenger volume, they are to forward staffing requests to the Director of Field Operations (DFO), who reviews the requests and determines whether they should be forwarded to headquarters for review. CBP human resources officials told us they review these requests and determine whether funds are available to address needs through allocation of additional staff. CBP Headquarters, however, has not provided formal, agencywide guidance to the port directors or DFOs on what factors should be considered to assess staffing needs or where staff should be allocated within a port. Without uniform agency guidance, everyone involved in the process from port directors to human resource officials must use their own judgment to determine staffing needs, and CBP cannot be assured that an individual port’s staff needs are being evaluated consistently or that staff are allocated to the ports with greatest needs nationwide.

To provide a more systematic basis for allocating staff, CBP in October 2003 began developing a staffing model based on agencywide criteria to help allocate staff to its ports. The intent of CBP’s staffing model is to reduce the degree of subjectivity in the process of determining staffing needs. It will assist in allocating existing staff levels across ports by using a uniform set of approximately 30 different criteria, such as passenger and trade volume, that are weighted according to their importance to CBP’s mission. After assessing these criteria, the model is to determine how to allocate the existing officer workforce among ports.

CBP officials developing the model said they plan to incorporate elements of two previous staffing models used by Customs and INS. However, as shown in table 1, the new model fails to address three weaknesses identified in our assessments of earlier models used by the legacy agencies upon which CBP’s model is based. Specifically, the model 1) will not take passenger wait times into account as a performance measure to help CBP assess whether staff levels are sufficient to address passenger volume, 2)  

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11 The Resource Allocation Model used by U.S. Customs was intended to estimate the number of inspectors and other personnel needed to process passengers and inspect cargo at all ports of entry. It also predicted what staffing levels would be needed agencywide and locally by occupation and by core functions on a yearly basis. The Workforce Analysis Model used by INS was intended to provide an objective means to allocate staff at ports of entry. The model examined basic port configurations and staffing schedules of immigration inspectors and then projected staffing levels in total and on an hourly basis for individual ports.
will not regularly take into consideration field input in determining appropriate staffing levels, and 3) will not be used to assess optimal levels of staff to ensure security while facilitating travel at individual ports and port facilities, including airports. CBP officials told us that because 1) they do not want to risk security in order to adhere to a time limit, 2) field requests for staffing changes should be assessed by the DFO on an as-needed basis, and 3) it is unlikely that additional inspection personnel will be forthcoming in the current budget climate, they have not considered addressing these factors in their staffing model. Table 1 summarizes these reported weaknesses and CBP’s views regarding the need to address them.

Table 1: Comparison of Weaknesses in Legacy Staffing Models to Those in CBP’s Model under Development

<table>
<thead>
<tr>
<th>Weaknesses identified in Workforce Analysis Model used by INS</th>
<th>Weaknesses identified in Resource Allocation Model used by Customs</th>
<th>Weakness identified in CBP’s model under development</th>
<th>CBP officials’ views regarding weakness identified relative to CBP’s model under development</th>
<th>Consequence of not addressing weaknesses identified</th>
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<tr>
<td>Customs’ model did not consider passenger wait times and cargo examination times as a performance measure in its assessment of staffing needs.</td>
<td>CBP’s plans for the model indicate it will not consider passenger wait times as a performance measure in its assessment of staffing needs.</td>
<td>CBP does not control all the factors contributing to wait times and will not use wait times as a performance measure because minimizing wait times is not its highest priority.</td>
<td>Excluding wait times as a performance measure in the staffing model prevents CBP from identifying airports with the greatest disparity between optimal and current staff allocation levels.</td>
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<td>Customs did not regularly include field components in decision-making process.</td>
<td>CBP does not plan to regularly or formally solicit input from field staff for its planned model.</td>
<td>CBP officials said field requests for staffing changes should be assessed and validated by the DFO and then provided to headquarters. As a result, they did not see a need for regular, formal field input from port directors or facility managers.</td>
<td>A lack of formal field input on a regular basis, will limit CBP’s ability to align staffing decisions with the needs and realities of the field environment.</td>
<td></td>
</tr>
<tr>
<td>Weaknesses identified in Workforce Analysis Model used by INS</td>
<td>Weaknesses identified in Resource Allocation Model used by Customs</td>
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<td>INS’ model did not detect overstuffed work shifts or project staff decreases when needed.¹</td>
<td>Customs’ model was not used to reallocate resources from one location or one function to another.²</td>
<td>CBP does not plan to use its model to assess optimal staff levels for each port or airport.</td>
<td>CBP’s planned model is to determine which ports have positions that can be reallocated to other ports through attrition; efforts to assess optimal staff levels would not be useful in the current budget environment.</td>
<td>Not identifying optimal staffing levels prevents CBP from performing workforce gap analyses, which could be used to justify budget and staffing requests by connecting program goals and strategies with the budget and staff resources needed to accomplish them.</td>
</tr>
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Source: GAO.

Notes:


The Enhanced Border Security and Visa Entry Reform Act of 2002 repealed the 45-minute standard for processing international air passengers through inspection that was established for INS. However, it added a provision requiring CBP to base staffing level estimates from its workforce model on the goal of providing immigration services within 45 minutes. CBP officials said that minimizing wait times is not a high priority because officials do not want to risk sacrificing security in order to adhere to a time limit. However, when a flight exceeds 60 minutes for processing passengers through primary inspection, CBP requires that port directors provide an explanation for why this occurred and take corrective actions.¹² Including a goal of providing inspection services within 45 minutes for international air passengers in its staffing model would assist CBP in

¹²When more than 20 percent of the airport’s flights on a given day exceed 60 minutes for processing, port directors must also include a detailed explanation to headquarters of how they plan to reduce wait times in the future.
determining the number of officers required to fulfill its missions of facilitating trade and travel while at the same time ensuring security and help identify airports with the greatest disparity between staffing requirements and current allocation levels.

Our prior work has shown that involving staff in all phases of workforce planning can help improve its quality because staff are directly involved with daily operations. Plans for CBP’s model rely on input from the ports and port facilities, including airports, regarding passenger and trade volume; passenger and trade complexity variables, such as number and value of cargo seizures; number of airport terminals; mix of passengers; arrests; and level of on-board staff. However, CBP’s efforts to solicit information from field officials do not occur formally on a regular basis or include guidance to port directors and DFOs on how to assess staff levels, and as a result, CBP does not receive timely and consistent input on critical staffing needs to help them adjust staff levels to ensure that staff are used as efficiently as possible. CBP officials said that they do not have definite plans to ask for staff needs assessments on a regular basis. For example, in November 2004 shortly after we initiated our review, CBP headquarters issued its first formal letter since the agency’s creation in March 2003, soliciting DFOs for their input on critical staffing needs. The solicitation did not include guidance or criteria to DFOs or port directors on how to assess their staff levels to help ensure that headquarters’ staffing decisions are based on consistent data from all ports. Furthermore, the request was not consistently communicated to all CBP locations; facilities managers at two of the five airports we visited after the solicitation was sent out said that they were unaware of the request for information. CBP officials told us that it is not headquarters’ responsibility to evaluate staffing requests from individual ports. Rather, it is the responsibility of the DFOs to evaluate staffing needs at ports on an ongoing basis. Nonetheless, regular, formal input from facility and port management would help CBP headquarters ensure that staff are used as efficiently as possible by aligning staffing decisions with the needs and realities of CBP ports nationwide.

CBP’s plans for the staffing model indicate it will be used to allocate existing staff across ports, for example it will help reallocate positions made available through attrition, but it will not determine whether current staff levels are appropriate or determine an optimal number of staff needed at individual ports or airports. CBP officials stated they have not assessed overall staffing needs across ports or airports and do not plan to do so with the proposed model because they do not expect to receive any additional resources given the current budget climate. However, according
to our primary human capital principles, agencies should identify gaps in their workforce to provide a basis for proper staffing to meet program goals. These workforce gap analyses can help justify budget and staffing requests by connecting program goals and strategies with the budget and staff resources needed to accomplish them. The model, when it is completed, will not identify such gaps according to CBP officials because absent additional resources, the only way to address these gaps would be to relocate officers. The officials said this is not a viable solution because of the costs associated with relocating CBP officers. According to CBP, the cost of moving a single CBP officer from one port to another is $60,400 on average. Determining an optimal number of officers for airports will help CBP link its budget requests to mission priorities, allowing the agency to determine which facilities have the greatest disparity between staffing requirements and current allocation levels and help ensure the most efficient allocation of new staff.

CBP officials told us that they set an original deadline of April 2005 for completing the proposed staffing model. As of June 2005, CBP had not finalized its model and did not have revised milestones or a schedule to measure their progress for completing and implementing the model. Until CBP finalizes its staffing model and establishes a schedule for completing and implementing its model, it is uncertain when the model will be available to provide a regular and consistent method for efficiently allocating staff.

As it performs its official missions, CBP maintains two overarching and sometimes conflicting goals: increasing security while facilitating legitimate trade and travel. To help achieve these goals, CBP has taken steps to increase staffing flexibility and improve the allocation of staff to help ensure that wait times are minimized and that existing levels of staff are being used as efficiently as possible. To that end, CBP initiated its One Face at the Border program to cross-train officers from its legacy agencies with the intention of providing more flexibility in its placement of staff. However, CBP’s lack of milestones for ports to complete this cross-training makes it difficult for the agency to determine when training will be completed within individual ports and hold port directors accountable.

Conclusions

for having their staff complete training. Furthermore, the lack of milestones affects port directors’ and facility managers’ ability to allocate officers within airports to different functions. We recognize that ports experience different traffic flow patterns and demands, and that taking staff offline to train them may require overtime or may increase passenger wait times. Nevertheless with established milestones, CBP would be better able to measure the progress of its cross-training program across ports and maximize port staffing flexibility.

CBP is also developing a staffing model to assist in determining officer allocation levels. In doing so, CBP has the opportunity to take a proactive approach to managing its human capital and address historical weaknesses of its legacy agencies’ systems for allocating personnel. Although CBP’s staffing model is a step in the right direction, we identified certain weaknesses that can affect CBP’s ability to place its staff to best advantage in addressing passenger wait times. While most airports were able to process passengers within 45 minutes on average during the period of time we examined, wait times for individual flights still exceeded 60 minutes five percent or more of the time at four of the 20 airports where CBP records wait time data. CBP’s exclusion of wait time standards for inspecting international air passengers in its planned model limits its ability to manage staff to accomplish the second part of its dual mission fostering international trade and travel. Furthermore, CBP’s lack of regular and formal input from airports and other port facilities limits the agency’s ability to ensure that its staffing decisions align with the needs and realities of its ports nationwide. Using the planned model to determine the allocation of existing staff without also determining an optimal number of staff for airports limits the agency’s knowledge of ports that have the greatest gaps between optimal and existing staff levels. Finally, CBP has not fully addressed what factors will be included in its model currently under development or set milestones for completing and implementing the model. By not addressing these weaknesses, CBP is bypassing an opportunity to develop information that would further enhance management decision-making concerning staff allocation and staff needs and providing budget justifications.

Recommendations

To assist CBP in its efforts to develop a staffing model that will help provide a basis for budget justifications and management decision-making and to establish goals and performance measures to assess its progress in completing its staffing model and its cross-training program, we recommend that the Secretary of the Department of Homeland Security
direct the Commissioner of U.S. Customs and Border Protection, to take the following five actions:

- provide ports with targets and milestones for having staff cross-trained to measure the progress of its One Face at the Border program while being sensitive to work demands in setting training schedules;
- incorporate wait time performance measures in the staffing model currently under development as required by the Enhanced Border Security and Visa Protection Act of 2002;
- use the staffing model under development to determine the optimal number of staff at each airport nationwide;
- systematically solicit input from the field on staffing needs and include uniform, agencywide guidance on how they should assess their needs and environment; and
- set out milestones for completing CBP’s planned staffing model.

DHS provided written comments on a draft of this report, and these comments are reprinted in appendix II. DHS concurred with three of our recommendations: to use CBP’s staffing model to determine the optimal number of staff at each airport nationwide, to systematically solicit input from the field on CBP staffing needs, and to set milestones for completing CBP’s planned staffing model. DHS said that CBP had efforts underway and additional plans to implement these recommendations.

DHS partially concurred with our remaining two recommendations. With respect to our recommendation to provide ports with targets and milestones for having staff cross-trained, DHS said that CBP believes it is not advantageous to implement across-the-board milestones, citing the need to coordinate training with appropriate work assignments so that the training can be directly applied. CBP officials said that it could take a number of years for officers to complete training nationwide and noted that they plan to begin computing training requirements through fiscal year 2007. We continue to believe it is important to establish milestones for cross-training CBP staff. CBP told us that the cross-training program is essential for increasing staff flexibility and enabling staff to properly conduct different types of inspections within airports. Having milestones for individual ports to complete required training would help improve accountability and planning. Given CBP’s concern about workload demands and the timing of training, the milestones could be established in consideration of the training needs and operational environment of each port. The planning process described by CBP could provide a basis for establishing these milestones.
With regard to our recommendation that CBP incorporate wait time performance measures in the staffing model currently under development, DHS said that CBP will consider (DHS emphasis) incorporating wait times for future resource allocation. We continue to believe that the wait time standards should be incorporated into CBP’s planned workforce staffing model. We note that such action is required by the Enhanced Border Security and Visa Protection Act of 2002. In addition, incorporating wait time standards would help CBP measure the extent to which it is achieving its mission of facilitating trade and travel while ensuring security. It would also allow CBP to identify airports with the greatest disparity between optimal and existing staff allocation levels.

We plan to provide copies of this report to the Secretary of the Department of Homeland Security, the Commissioner of the U.S. Customs and Border Protection, and interested congressional committees. We will make copies available to others upon request. In addition, the report will be available at no charge on the GAO Web site at http://www.gao.gov.

If you or your staff have any questions concerning this report please contact me at (202) 512-8777. Key contributors to this report are listed in appendix III.

Richard M. Stana
Director, Homeland Security and Justice
Appendix I: Objectives, Scope, and Methodology

To assess CBP’s progress in minimizing wait times for international air passengers while ensuring security, we analyzed (1) the wait times at the 20 U.S. international airports that receive most of the international traffic and factors affecting wait times; (2) the steps airports and airlines have taken to minimize passenger wait times; and (3) how CBP has managed staffing to minimize wait times across airports.

Specifically, to determine the wait times at U.S. airports and factors affecting wait times, we analyzed CBP wait time data collected between October 1, 2004 and March 31, 2005. CBP’s calculation of wait time changed on January 10, 2005, and we determined the difference in wait times between the time periods of October 1, 2004, through January 9, 2005, and January 10, 2005, through March 31, 2005. We calculated average wait times and average percent of flights exceeding 60 minutes for 20 major U.S. airports based on CBP’s data. We assessed the reliability of the passenger volume, wait time, number of inspection stations and inspection staffing data by (1) reviewing existing information about the data and the systems that produced them, (2) interviewing agency official knowledgeable about the data, and (3) comparing what we observed at the selected airports visited with the data. We determined that the data were sufficiently reliable for the purposes of this report. For the purpose of calculating the percentage of flights exceeding 60 minutes for primary passenger inspection, the data are sufficiently reliable to compare airports but not sufficiently reliable as a performance measure. We found high rates at some airports of numerous flights with wait times of 59 or 60 minutes. If the performance standard was changed to 59 or 60 minutes, the percentage of flights exceeding this threshold would be different from that reported in Figure 5. The data should be viewed as limited indicators of overall wait times at airports, because the available data only spanned two and one half months of wait times and did not include the peak travel periods of June through September when wait times may be higher. To determine the factors affecting wait times, we interviewed CBP officials at both headquarters and at the port level, such as port directors, who are responsible for overall management of the port, including airports. We also interviewed selected airport and airline officials who are involved with international passenger processing and could provide perspective on what factors affected wait times at U.S. airports. In addition, we interviewed officials at airport and airline associations who provided us with international passenger volume statistics and contacts for officials at the locations we visited.

To determine the steps airports and airlines have taken to minimize passenger wait times, we visited five international airports based on their
unique characteristics and geographic dispersion. The airports selected were George Bush Intercontinental Airport, Dallas-Fort Worth International Airport, Washington Dulles International Airport, Baltimore-Washington International Airport, and Hartsfield Atlanta International Airport. At these five airports, we interviewed airport and airline officials who were involved in international passenger processing issues to learn how they interacted with CBP to help speed passenger processing. We also reviewed documentation provided to us by officials at three airports on assessments they had produced on the number of stations and CBP officers needed at their airports to process passengers within certain time limits. We observed the inspection facilities at each of the five airports visited to compare the capacities and constraints to passenger processing at each. Specifically, we observed facilities’ upgrades where airports had either built an entirely new facility or added inspection stations to existing facilities.

To assess how CBP has managed staffing to minimize wait times across airports, we interviewed CBP officials at headquarters and from the five selected airports. For example, we interviewed port directors and other field-level officials to gather perspectives on what options are available to CBP field managers to manage staff to improve wait times at airports. To analyze how CBP’s cross-training program affects the agency’s ability to allocate staff to airports, we spoke with officials responsible for developing and delivering training curriculums to the various ports and we examined these curriculums and their delivery schedule. To determine how CBP currently allocates staff, we spoke with officials in the budget, human resource and planning offices in CBP’s Office of Field Operations. We also reviewed and evaluated documentation on CBP’s policies and procedures for allocating staff to ports. To understand and evaluate CBP’s staffing model under development, we spoke with agency officials responsible for planning and implementing the model’s development and analyzed the criteria associated with the model. We also reviewed our and the Department of Justice Inspector General’s prior work on previous models developed for U.S. Customs Service and the Immigration and Naturalization Service and compared these findings with the new model.

We performed our work from October 2004 to June 2005 in accordance with generally accepted government auditing standards.
Appendix II: Comments from the Department of Homeland Security

July 11, 2005

Rich Stana
Director Homeland Security and Justice
Government Accountability Office
441 G Street, N. W.
Washington, D. C. 20548

Dear Mr. Stana:

Thank you for the opportunity to review and comment on draft report GAO-05-663, International Air Passengers Staffing Model for Airport Inspections Personnel Can Be Improved. The Department of Homeland Security (DHS) agrees with the overall findings that Customs and Border Patrol (CBP) needs to take additional steps to address weaknesses in its staffing model and determine milestones for the completion of a staffing model and cross-training activities. DHS and CBP concur with the recommendations in the draft report. The following represents the Departmental response to the recommendations contained in the draft report.

**Recommendation 1:** Provide ports with targets and milestones for having staff cross-trained to measure the progress of its One Face at the Border Program while being sensitive to work demands in setting training schedules.

**Concur in part:** As an interim measure, CBP instituted a report card system where CBP Headquarters provides the Directors of Field Operations (DFOs) monthly reports that reflect the status of their training efforts. On a quarterly basis, CBP Headquarters provides DFO management with comments and suggested areas of improvement where certain training modules were not aggressively rolled out.

In July 2005, CBP Headquarters will ask the DFOs to provide information about staffing concerns, and the impact of staffing on mission achievement and delivery of cross training modules. This information will allow CBP Headquarters to compute training projections through Fiscal Year 2007 and will provide the basis for future discussions with the DFOs to sharpen field office specific goals and milestones.

CBP believes that it is not advantageous to implement across the board milestones. To train all employees by a specific end of the year date, while possible, would not be in CBP’s best interest, if the training cannot be directly applied in appropriate work assignments soon after
the training is delivered. It is CBP’s goal to train all CBP Officers once rotations are made and other courses for legacy Immigration Inspectors are rolled out.


Concur in part: CBP has established a Headquarters-level working group to analyze what measures should be utilized for a staffing model that captures the needs of all ports. While CBP will consider incorporating the wait times in the model under development for future resource allocation, CBP may only be able to give minimal consideration to wait times at the beginning of fiscal year 2006. CBP will aggressively work on automation during the next year and strive for a final product by September 2006.

Recommendation 3: Use the staffing model under development to determine the optimal number of staff at each airport nationwide.

Concur: CBP Headquarters has distributed a spreadsheet to each field office that asks for specific information for use in the development of the staffing model and decision making regarding staffing allocations. CBP will input this information into the model to test the utility of the model in improving projections of resource needs. To determine the validity of information, CBP will conduct several analyses in the coming months to determine if the model is producing the anticipated results using the information gathered from the field.

Recommendation 4: Systematically solicit input from the field on staffing needs and include uniform, agency wide guidance on how they should assess their needs and environment.

Concur: The staffing model working group has already started to systematically solicit input from the field offices on their staffing needs. CBP Headquarters provided a spreadsheet to each field office requesting specific information be filled in and returned to the group by the end of June 2005. Examples of information being captured in the spreadsheet include the number of crossings or other locations under a duty location, the number of vehicle, cargo, rail and pedestrian lanes, the number of primary lanes, whether or not it is air, land or sea, the number of hours the location is staffed and how many staff are dedicated to operations, etc. Preliminary information not previously captured should provide additional data to utilize as a measure within the model. A proposal was approved in May 2005 that would require field offices update the spreadsheet quarterly until the Office of Field Operations has complete confidence in the staffing model.

Recommendation 5: Set out milestones for completing CBP’s planned staffing model

Concur: Since the new group has recently been designated, CBP has not set future milestones for completing the planned staffing model. We anticipate the first milestone will be to set staffing levels for CBP Officers and Agriculture Specialists. The working group will be meeting within the next several months to develop milestones.
If you, or your staff, have any questions or need additional information, please contact Ms. Arlene Lugo, CBP Audit Liaison, at 202-344-1218.

Sincerely,

[Signature]

Steven J. Pecinovsky
Director
Departmental GAO/OIG
Liaison Office
## Appendix III: GAO Contacts and Staff

### Acknowledgments

Leo Barbour, Grace Coleman, Deborah Davis, Nancy Finley, Christopher Keisling, Jessica Lundberg, Robert Rivas, and Gregory Wilmoth made significant contributions to this report.

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