

U.S. CUSTOMS AND BORDER PROTECTION

**INTEGRITY AND  
PERSONAL  
ACCOUNTABILITY  
STRATEGY**

## FOREWORD FROM THE COMMISSIONER

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Integrity, a core value of U.S. Customs and Border Protection, is the cornerstone upon which we build the foundation of public trust and confidence that enables us to perform our mission.

The personal embodiment of the core value of integrity reflects our commitment to professionalism and excellence in law enforcement. Personal integrity is a commitment that each of us makes to doing the right things, the right way, at the right time, including the reporting of inappropriate, corrupt or criminal actions when observed.

This *Integrity and Personal Accountability Strategy* outlines the responsibility of every person in CBP and its leadership to foster our culture of integrity. Every member of CBP – mission-support employees, managers, supervisors, agents and officers – all have a responsibility to implement the strategy.

The comprehensive strategy emphasizes how integrity, reflected in employee conduct both on and off the job, is in fact a reflection of CBP. Our conduct, at all times, is the basis of the opinions formed about our organization by the communities we serve and protect.

This strategy guides an implementation process that will be measured and analyzed, to ensure our collective actions reinforce Integrity as a core value.

I know the character of the men and women of CBP will help us implement this strategy and that together we will foster a culture of integrity and personal accountability that will serve our nation's security and prosperity.



R. Gil Kerlikowske  
Commissioner

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# CBP MISSION AND CORE VALUES

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Today, with 60,000 employees, U.S. Customs and Border Protection (CBP) is one of Department of Homeland Security (DHS's) largest and most complex components, with a priority mission of keeping terrorists and their weapons out of the United States. It also has a responsibility for securing the border, approximately 7,000 miles of land borders and 95,000 miles of coastline, and facilitating lawful international trade and travel. CBP takes a comprehensive approach to border management and control, combining customs, immigration, border security, and agricultural protection into one coordinated and supportive activity. On a typical day, CBP processes nearly 1 million travelers, screens more than 67,000 cargo containers, arrests more than 1,100 individuals and seizes nearly 6 tons of illicit drugs. CBP enforces hundreds of U.S. laws and regulations, including customs, immigration, trade, and drug laws. In addition to its own regulations, CBP's enforces more than 500 laws for 47 Federal agencies, in coordination with these agencies.

## ***Mission Statement***

*“To safeguard America’s borders thereby protecting the public from dangerous people and materials while enhancing the Nation’s global economic competitiveness by enabling legitimate trade and travel.”*

## ***Core Values***

CBP's culture is a reflection of its collective history, which is captured within our stated values of vigilance, service to country, and integrity. These core values unify the individual histories and cultures across the Agency. They drive a shared purpose by uniting the beliefs and behaviors of all CBP employees. These core values continue to serve the Agency well, and CBP must continue to promote the health and strength of its culture to ensure unity and mission success across CBP.

***Vigilance*** is how we ensure the safety of all Americans. We are continuously watchful and alert to deter, detect and prevent threats to our nation. We demonstrate courage and valor in the protection of our nation.

***Service to Country*** is embodied in the work we do. We are dedicated to defending and upholding the Constitution of the United States. The American people have entrusted us to protect the homeland and defend liberty.

***Integrity*** is our cornerstone. We are guided by the highest ethical and moral principles. Our actions bring honor to ourselves and our agency.

# A CULTURE OF INTEGRITY

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The Nation has placed its trust in the men and women of CBP to carry out its mission with professionalism, honor, and above all, integrity. Corruption or the abuse of public office for personal gain destroys the public's trust and confidence in CBP. The corruption of any employee harms the organization and can thwart CBP from successfully achieving its mission. Thus, ensuring that employees conduct themselves with integrity and professionalism as they carry out the critical duty of protecting and securing America's borders and facilitating lawful international trade and travel is among the Agency's highest priorities. Furthermore, an employee's obligation to act with professionalism, honor and integrity does not stop when their workday is over, but continues off duty as well. The American people will accept nothing less than 100 percent compliance with the highest standards of integrity and the obligation to accept responsibility for one's actions.

## ***Culture, Standards of Conduct and Trust***

CBP fosters a culture of integrity, where every employee is held to the highest standard of honest and ethical conduct. The elements of CBP's culture of integrity are founded in the Oath of Office and Standards of Conduct to which every employee is expected to adhere. All employees must maintain high standards of honesty, integrity, impartiality, character, and professionalism to ensure the proper performance of government business and the continued trust and confidence of the public. The conduct of CBP employees must reflect the qualities of integrity and loyalty to the United States; a sense of responsibility for the public trust; courtesy and promptness in dealing with and serving the public; and a standard of personal behavior that reflects positively upon, and will be a credit to, both CBP and its personnel. In addition, CBP's culture is strengthened when every member of the workforce can be counted on to perform according to the guiding principles of CBP: the Mission Statement; Core Values, Employee Oath of Office; and the commitment to upholding the Standards of Conduct, and adhering to them consistently. Every CBP employee shares responsibility for promoting integrity, and for meeting mission demands while sustaining the trust and confidence of the public. These elements are further enhanced when CBP personnel leverage and integrate available resources from across the Agency to strengthen integrity and address corruption and misconduct.

## ***Integrity Mission***

Strengthen CBP's culture of unwavering integrity and professionalism by increasing awareness and implementing comprehensive, integrated programs and capabilities designed to prevent, detect, investigate and respond to instances of corruption and misconduct across all levels in the Agency.

## ***Agency Commitment***

CBP's commitment to integrity begins with the quality of the employees hired. The Agency's integrity assurance process includes a thorough initial screening of applicants, pre-employment polygraph examinations of law enforcement candidates, and an exhaustive background investigation. These tools combined, enhance CBP's ability to identify vulnerabilities and allow for a thorough vetting of the men and women seeking employment. Periodic reinvestigations of an employee's background are conducted throughout an employee's career in order to identify emerging integrity and conduct concerns.

Leadership has a key role in setting high ethical standards in every office. Leading by example, CBP leadership, through their commitment, actively ensure that the Agency continues to exemplify the highest standards of integrity. CBP strives to sustain a work environment where everyone can take pride in an Agency others respect and admire. To that end, CBP has created conditions that continually foster an environment where corruption is not tolerated and ignoring detrimental suspicious behavior or suspected criminal conduct is unacceptable. CBP is always mindful of the public's trust, and employees are

encouraged to report instances of corruption and misconduct to the appropriate offices without the fear of reprisal or retaliation. CBP is firmly committed to protecting the rights and privileges of those who come forward and perform this duty. CBP regards any violation of law by an employee, on or off duty as, being inconsistent with and contrary to the Agency's law enforcement mission.

### ***Consequences of Violating the Nation's Trust***

Corrupt employees tarnish CBP's reputation and bring dishonor to CBP service. Corrupt employees place the well-being of the nation in jeopardy. When a CBP employee violates the trust the nation has granted him or her through a corrupt act, the employee not only compromises CBP's mission, but also sacrifices their professional, financial, and social wellbeing. For example, an employee who commits a corrupt act for a short-term monetary gain, trades what could have been a rewarding and honorable career for what will inevitably lead to financial hardship and public exile. First and foremost, the employee will face legal consequences which could include significant prison time. Financially, the employee will face costly legal expenses, and a significant loss of income from the loss of their job and imprisonment. The employee's poor decision will also follow the person through the rest of their life, severely inhibiting their employability in a wide range of careers. The stress of legal and financial problems will also have an impact on the employee's family, making it more difficult for an employee to contribute to the family's well-being. This example highlights the clear personal and professional costs that are associated with an integrity failure.

## **THREATS TO CBP'S CULTURE OF INTEGRITY**

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The overwhelming majority of the men and women who constitute the CBP workforce serve with honor and integrity, adhering to the high standards demanded of CBP personnel. However, a small number of employees, less than three-tenths of a percent, are known to have violated that trust. Between October 1, 2004 and September 30, 2013, 163 current or former CBP employees have been arrested, indicted or otherwise prosecuted on corruption charges.

In a number of instances, corruption was the result of inducements or coercion by Transnational Criminal Organizations (TCOs) via monetary bribes, non-traditional forms of corruption and blackmail. The expanding size, scope, complexity, and influence of TCOs is a direct contributing factor to corruption at CBP because TCOs have determined that undermining the stability of the CBP workforce is a worthwhile endeavor to further their criminal enterprise. TCO driven corruption is on the rise as a result of CBP's success in securing the border from TCO and other criminal threats.

CBP's ability to execute its mission is not only inhibited by criminal corruption, but also by arrests and administrative delinquencies. Between fiscal year 2005 to fiscal year 2013, there have been 2,446 instances of arrests based on charges such as domestic violence or driving under the influence. Although this constitutes 2.5 percent of CBP's workforce, such arrests seriously hinder organizational performance, impair employee morale, and undermine the public's confidence in the Agency.

CBP employees can become susceptible to corruption and misconduct for a number of reasons, particularly when they experience financial or personal hardships. The social and psychological impact of long hours in arduous conditions can also impact an employee's resilience. Identifying corrupt employees can be difficult, and employees can engage in corruption or misconduct even if they have no prior history of such behavior.

# INTEGRITY STRATEGIC FRAMEWORK

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CBP has made significant advancements in addressing corruption and misconduct. We continue to invest in personnel, technology, programs and training to strengthen integrity. These achievements have resulted in a more resilient CBP. Yet until now, there has been no CBP-wide strategy to guide the men and women of the Agency throughout their career. This is the first unified strategy with respect to integrity, the CBP Integrity and Personal Accountability Strategy (*Integrity Strategy*).

This comprehensive *Integrity Strategy* establishes a unified and multi-layered approach organized around four integrity related mission areas: prevention, detection, investigation, and response to corruption and misconduct. The *Integrity Strategy* also addresses two primary cross-cutting strategic issues that span all mission areas: integration and awareness. Capitalizing on the synergies and varied capabilities of CBP offices, the *Integrity Strategy* enhances the Agency's collective ability to address corruption and misconduct in the workforce.

## ***Prevention***

Preventing corruption and misconduct is important in fostering a culture of integrity because it ensures that the CBP workforce is comprised of individuals who are already committed to the highest levels of ethical conduct and continuously pursue opportunities to renew and strengthen that commitment. Prevention is a two-pronged process. First, it entails screening candidates to ensure that only those with the highest level of integrity are accepted for employment with CBP. Second, current employees are periodically reinvestigated and receive training to reaffirm their commitment to integrity. CBP employs multiple tools and capabilities to prevent workforce integrity issues including background investigations, pre-employment polygraph examinations for law enforcement candidates, periodic reinvestigations of existing employees, and numerous training options.

## ***Detection***

In addition to vigorous efforts to prevent corruption, CBP actively seeks to identify instances of corruption to neutralize and remove integrity related threats from the workforce. CBP takes an intelligence-driven approach that applies behavioral science and analytical research methods to identify potential indicators of workforce corruption. Intelligence driven detection has been improved by the significant steps CBP has taken in its ability to gather and analyze data anomalies that indicate a likelihood of corruption from operational data, background investigations, polygraph examinations, and known cases of corruption.

## ***Investigation***

Once potential instances of corruption or misconduct have been identified, CBP Office of Internal Affairs (IA) is the primary entity which investigates to determine whether the allegation or threat is valid and requires a response. CBP IA maintains a highly-trained cadre of criminal investigators who diligently and thoroughly investigate allegations of employee corruption. CBP IA seeks to collaborate and share information with its law enforcement partners within the DHS Office of Inspector General (OIG), Immigration and Customs Enforcement (ICE), Office of Professional Responsibility (OPR) and the Federal Bureau of Investigation (FBI)-led Border Corruption Task Forces (BCTFs).

**Response**

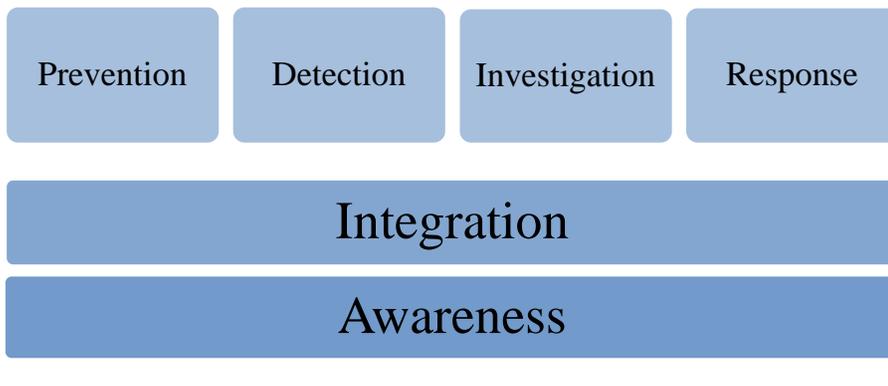
A successful Agency response includes implementing appropriate corrective action through the Agency's disciplinary program, addressing employee concerns, evaluating any vulnerabilities and failures in Agency operations, and recommending appropriate modifications to operations and prevention strategies. The Agency must have a transparent and well-publicized disciplinary process, so that employees are fully and fairly informed of their legal and ethical obligations and can behave accordingly.

**Cross Cutting Issue - Integration**

Maintaining a culture of integrity must be a priority for every single person working at CBP. It must be an underlying focus for every team, program, and office. Many offices within CBP have already taken steps and implemented programs to strengthen integrity. For example, the Office of Field Operations (OFO), Office of Border Patrol (OBP) and IA have integrated staff that evaluates integrity trends and patterns through analysis of data anomalies at ports of entry and checkpoints. Other efforts include cross-organizational representation in integrity focused committees. To ensure the application of a unified standard and an Agency-wide culture of integrity, the existing disparate efforts must be integrated through coordinated and collaborative planning. This *Integrity Strategy* is intended to serve as a tool to unite these efforts under a single, unified mission to strengthen CBP's culture of integrity.

**Cross Cutting Issue - Awareness**

Throughout every step in this strategic framework, enhancing employee awareness is a critical underpinning to successfully strengthening the CBP culture of integrity. Awareness is increased by training and communication programs that ingrain and reinforce the standards of conduct all employees are expected to maintain. Integrity, ethics and counter-corruption training and messaging found within such programs as new employee orientation, ethics training and the CBP Leadership Institute can be used to encourage employees to report possible instances of corruption or misconduct, which will further strengthen CBP's prevention and detection capabilities.



# GOALS AND STRATEGIC OBJECTIVES

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This *Integrity Strategy* outlines an integrated set of goals and objectives that will enable CBP to constantly strengthen its culture of integrity by increasing awareness and implementing comprehensive, integrated programs and capabilities designed to prevent, detect, investigate and respond to instances of corruption and misconduct across all levels in the Agency.

## **1. Prevention**

### ***1.1. Effectively screen candidates and ensure unfit applicants are removed from the candidate pool***

#### ***1.1.1. Maintain compliance with the Anti-Border Corruption Act of 2010***

CBP is in full compliance with the mandate of Public Law 111-376, the *Anti-Border Corruption Act of 2010* (ABCA). This law required that by January 2013, all CBP law enforcement applicants receive a polygraph examination before being hired. The law further required that CBP initiate all periodic personnel reinvestigations that were overdue and that Congress receive bi-annual reports on CBP's progress toward meeting these requirements for a period of two years.

#### ***1.1.2. Evaluate an enhanced background investigation process to increase its efficacy and efficiency***

CBP will use effective technology to detect and prevent incidents of corruption. This includes continuing to utilize polygraph examinations as an added resource to identify applicants who are unsuitable for these sensitive law enforcement positions. CBP will continue to evaluate the most effective and cost-efficient processes to thoroughly screen applicants so that the best-qualified individuals are selected to join the ranks of CBP.

### ***1.2. Deter current employees from committing acts of corruption and misconduct through periodic reinvestigation, proactive committees and continuous evaluation of education and training***

#### ***1.2.1. Evaluate the efficacy and efficiency of the periodic reinvestigation program***

Periodic reinvestigations of CBP personnel are critical to continuing our efforts to ensure that current personnel are maintaining the high standards of conduct and professionalism required by our organization. These investigations must meet standards of privacy and other regulations, and ensure that regular screening is conducted for these sensitive law enforcement positions.

#### ***1.2.2. Employ innovative ways to preemptively and proactively maximize organizational integrity***

CBP's *Integrity Strategy* requires collaboration between leadership, integrity committees, integrity positions and investigative entities. Some examples of this are found in the following integrity bodies within CBP. OFO's Integrity Committee composed of representatives from IA, OBP, Office of Human Resources Management (HRM) and OFO Headquarters and OFO Directors of Field Operations, meet on a quarterly basis to collaborate on integrity matters and various elements of the OFO Integrity Program. Similarly, the OBP Integrity Advisory Committee provides strategic recommendations to combat corruption and promote integrity efforts for the Chief of the U.S. Border Patrol (USBP). The committee meets two to four times a year and is comprised of USBP representatives, as well as advisors from IA, HRM, OFO and the Office of Chief Counsel

(CC). Additionally, Office of Air and Marine (OAM) has developed an Integrity Advisory Board that meets regularly to help maintain and continuously improve a culture of integrity, accountability, and ethical behavior. Furthermore, Ethics Committees, organized by individual USBP sectors focus on field-level programs in order to address individual, leadership, operational and organizational integrity needs and vulnerabilities at the U.S. Border Patrol Sectors. Many of the Ethics Committees are integrated, to include OFO, Office of Air and Marine (OAM), and CC representatives. Also, OFO's 19 Integrity Officers, representing each Field Office, champion integrity efforts through data analysis, outreach and liaison with field entities.

***1.2.3. Develop training modules to educate CBP personnel about integrity related threats***

CBP will continue to develop training that highlights discussions of real-life cases in which corruption was identified and how corruption cases came to light.

***1.2.4. Ensure a supportive environment for employees***

CBP promotes a supportive environment for employees who may become overburdened by worry, stress or adversity. Led by HRM, CBP offers help through the WorkLife4You Program and the Employee Assistance Program. HRM also works with the operational offices and supervisors to enhance existing peer support, chaplaincy and crisis prevention programs. They are confidential resources and can provide problem identification and referral assistance to anyone struggling with personal issues, including substance abuse. Through education and proactive actions, these programs will help eliminate both on and off duty misconduct before it occurs.

***1.3. Enhance the quality of CBP's screening tools and procedures by tracking their efficacy***

***1.3.1. Plan to develop a mechanism to maintain and track data that identifies which screening tool was used to determine applicants that were not suitable for hire to gauge the relative effectiveness of screening tools***

CBP continues to develop an integration tool between systems to help track data from background investigations and polygraphs. Enhanced quarterly reports will provide statistical information as to the source of derogatory information (preliminary law enforcement database checks, polygraph examination, or field investigation) resulting in negative suitability determinations and assist in determining the relative effectiveness of screening tools.

***1.3.2. Conduct quality assurance reviews of adjudications to ensure that procedures are followed in evaluating the results of pre-employment and periodic background investigations***

CBP is strengthening the current quality assurance process to verify the accuracy of data collected, which will reinforce the overall efforts to ensure reliability.

## **2. Detection**

### **2.1. Employ an intelligence driven approach to identify instances of corruption and misconduct**

#### **2.1.1. Collect data from all possible sources, internal and external, to increase the likelihood of detecting acts of corruption**

In order to effectively combat corruption, CBP will collect and utilize all possible data concerning integrity. CBP will also create centralized repositories for data likely to indicate instances of corruption to unify efforts to track integrity related offenses.

#### **2.1.2. Promote the CBP Drug-Free Workplace Program**

Illegal drug use is a crime that will not be tolerated within CBP's ranks. CBP's mission to enforce the country's drug laws is compromised when employees are either tolerant of drug use or consumers of drugs themselves. To this end, CBP is promoting the Drug-Free Workplace Program as a further deterrent to those considering using drugs.

#### **2.1.3. Deploy innovative analytical techniques to improve the quality of the information CBP uses to identify corruption**

Such analysis will be used to spot trends, identify weaknesses and strengths within the Agency, and plan to address problems before they arise. CBP will also improve its integrity efforts through the analysis of the post-corruption reports conducted by CBP offices. This information will help CBP better identify corruption risks, and better tailor existing procedures. These reports detail how employees conducted corrupt activity, and make recommendations for preventing further corruption.

#### **2.1.4. Implement an annual threat assessment and integrity guidance to better inform and guide future CBP prevention and detection efforts**

CBP should establish an annual comprehensive threat assessment of the threat posed to CBP by acts of corruption and abuse of public office. It should be prepared through detailed analysis of data, trends, intelligence, and data available to CBP and its partners. The assessment and guidance will help identify and respond to threats and allow CBP to apply resources effectively.

### **2.2. Support efforts by CBP personnel to report suspected instances of corruption or misconduct**

#### **2.2.1. Provide training to managers and others that supports a culture of integrity**

All personnel are held responsible for adhering to a code of conduct and reporting violations of that code. Periodic in-service training equips CBP employees with the tools they need to recognize, report, and respond to integrity challenges they will encounter both on and off duty. Additionally, training content can be refined to provide instruction tailored to a specific operating environment where corruption may be more prevalent.

#### **2.2.2. Publicize avenues for reporting suspected instances of corruption and misconduct and any time a CBP employee is arrested**

CBP will continue to pursue communications methods that promote and make personnel aware of the methods available to them to report suspected instances. This will also reinforce employees' understanding of their responsibility to report any arrest on or off duty.

### **3. Investigation**

#### **3.1. Enhance CBP's investigation capabilities, programs, and policies**

##### **3.1.1. Further cultivate relationships with other investigatory agencies**

CBP IA has primary jurisdiction and direct investigative authority allowing CBP to initiate and conduct internal affairs investigations of criminal misconduct by CBP employees. Through its direct investigative authority, CBP IA is equipped to respond to allegations of corruption with timely and transparent investigations. CBP recognizes that collaboration and information sharing is a critical factor in maintaining border integrity and investigating allegations of misconduct and corruption. CBP IA, DHS OIG, ICE OPR and the FBI work together to address possible cases of corruption. CBP is an integral member of twenty-two (22) FBI-led BCTFs organized throughout the United States. This layered approach and collaboration among federal agencies is critical to the mission, while ensuring an effective and timely investigative response. CBP will continue to participate in task forces that promote multi-jurisdictional, multi-agency investigations leveraging the resources of all members.

### **4. Response**

#### **4.1. Improve CBP's response programs that are critical to employee wellness and CBP's culture of integrity**

##### **4.1.1. Increase efficiency and consistency throughout CBP's disciplinary process**

A culture of integrity is supported when employees are informed of the expectations of management, and that discipline will be imposed for misconduct. In order to ensure a strong culture of integrity, CBP must strive to make its disciplinary process efficient yet fair, consistent in both the process and the result, and transparent to both the workforce and the public. CBP is committed to reviewing its disciplinary process, and finding new ways to increase the efficiency, accountability, fairness and consistency of its adjudication of allegations of misconduct.

##### **4.1.2. Prepare an annual CBP disciplinary actions report**

Prepare a report with the intentions to improve the overall transparency of the discipline system. In addition to statistical disciplinary action information, the report would also incorporate any structural or procedural changes made that year to achieve improvements.

##### **4.1.3. Eliminate vulnerabilities that create opportunities for corruption and exploitation**

Responding to confirmed cases of corruption and misconduct through disciplinary actions is intended to neutralize or remove threats to CBP's culture of integrity. Equally, CBP intends to eliminate vulnerabilities that create opportunities for corruption or exploitation by considering policy and procedural corrections in aspects of the organization and mission. For example, the Analytical Management Systems Control Office (AMSCO), IA, the OFO Integrity Committee and OBP Integrity Advisory Committee identify opportunities to address vulnerabilities by developing best practices, instituting systematic corrections and strengthening policy.

IA, in conjunction with CBP operational components, also collaboratively conducts post corruption analysis as a means to gather valuable data regarding lapses in employee integrity. This combined effort assists in developing future operational deterrents and detection methods.

## **5. Cross Cutting Issue: Integration**

### **5.1. Integrate the full range of CBP's professionalism, integrity and counter-corruption initiatives**

#### **5.1.1. Mature CBP's coordination oversight mechanism for integrity and counter-corruption activities**

Integrating ethical and professional decision-making into daily work supports CBP's critical mission, and ensures that the citizens of the United States have confidence in the integrity of Agency programs. It starts with the individual employees and continues through all the teams, programs, and offices to incorporate the entire Agency. CBP is committed to a workforce that operates jointly, at times interchangeability and with one voice.

CBP's Integrity Integrated Planning and Coordination Committee (Integrity IPCC) promotes cross-Agency coordination and successful implementation of the *Integrity Strategy*. Co-lead by the Office of Policy and Planning and IA the Integrity IPCC meets periodically or as needed to complete necessary staff work to promote unity of effort in integrity programs. CBP also engages agency top leadership through the Commissioner's Integrity Council at a minimum two times a year to consider top line issues identified by the Integrity IPCC, render decisions and provide guidance to offices for appropriate implementation.

#### **5.1.2. Support partnerships and information sharing among all CBP offices**

Effective partnerships are a force multiplier and help the CBP mission. CBP has many unique partnerships that cross multiple CBP offices. For example, AMSCO has partnered extensively with the Office of Information and Technology's Targeting and Analysis System Program Office (TASPO). In partnership, AMSCO and TASPO have developed and deployed technology that improves training and policy adherence and deters acts of corruption by reengaging management with the activities of frontline Officers. CBP can further strengthen its partnerships by identifying opportunities to share program information where appropriate as it relates to integrity matters. With that goal, OFO and OBP have integrated staff that evaluates integrity trends and patterns through analysis of data anomalies at ports of entry and checkpoints. This enhanced coordination and partnership effort is critical at the operational, tactical, strategic, and policy levels and will continue to be implemented in a manner that does not jeopardize ingrained partner relationships deemed critical to the creation of methodologies that enhance the integrity process through the identification of data patterns and trends.

## **6. Cross Cutting Issue: Awareness**

### **6.1. Improve CBP's education and awareness programs that are critical to employee engagement and promoting integrity**

#### **6.1.1. Develop integrity training for CBP to ensure a structured and consistent approach in promoting integrity across the Agency**

Throughout an employee's career, CBP provides training that focuses on integrity and decision making. When employees initially join CBP, they receive training promoting workforce integrity as part of CBP's New Employee Orientation program. Newly hired CBP law enforcement officers receive an expanded level of mandatory training to include a CC provided ethics-related training instruction as part of the basic training curriculum.

Instituting a deliberate, recurring integrity training plan is an important part of the advanced and specialized training for CBP employees beyond their initial entry on duty. This training leads to, combined with proper leadership, oversight, and management at all levels of the Agency, a culture of professional and personal accountability and integrity within CBP. It clearly communicates the standards of conduct, both on and off duty, with which all CBP employees must comply and identifies the consequences of engaging in inappropriate behavior. CBP supervisory and leadership training programs such as Supervisory Leadership Training, Incumbent Supervisory Training, the Second Level Command Preparation, the CBP Leadership Institute, and the Department's Senior Executive Service Candidate Development Program incorporate classroom instruction and a series of practical exercises that prepare CBP leaders to guide and direct the workforce in a manner that promotes personal integrity and accountability through critical thinking and integrity-based, ethical decision making.

#### **6.1.2. Further cultivate and reinforce the highest level of integrity in the CBP workforce through effective communication**

Integrity messaging and communication, like training, begins when an employee joins CBP, and continues throughout their career. Cultivating a strong communications relationship between a supervisor and employee is the first step to sustaining a robust culture of integrity. Rewarding and acknowledging those that have displayed superior integrity and professionalism is critical to underscoring this relationship.

Integrity is an integral part of the day-to-day lives of CBP employees. Promoting the highest levels of integrity is accomplished through a variety of media and venues at different levels of the Agency. Musters, town halls, and meetings engage employees in issues such as reporting misconduct and unethical behavior, standards of conduct and the need for integrity. Beyond ensuring an employee understands the standards of ethical behavior both on and off duty, CBP is focused on providing greater awareness of recruitment, corruption, and bribery attempts by TCOs, and how to respond to and report these attempts. CBP deploys a portal for all integrity-related items including leadership messages and videos, webcasts and training reminders. This messaging highlights both the positive and negative aspects of CBP employees' behavior. Stories posted on the Intranet highlighting community service or courageous behaviors of CBP employees aim to build a sense of community in demonstrating the strong moral character of CBP employees and their commitment to integrity. Conversely, the Trust Betrayed site displays examples of criminal misconduct by CBP employees offering a clear reminder of the personal and professional costs associated with integrity failures.

CBP has deployed the Integrity and Professionalism Campaign to complement current and ongoing messaging to the workforce. In the first series of integrity messaging, CBP, through video clips with tailored messaging, solicits employees' involvement in reporting suspicious behavior. CBP will continue to refine various mediums to support a consistent approach to talking about these critical issues with employees.

## IMPLEMENTATION

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Effective implementation will drive the success of the *Integrity Strategy*. Success depends on the full support of senior leadership and implementation by all Agency employees. It requires a commitment to new and existing partnerships and development of detailed guidance on roles and responsibilities. Additionally, success will require advancing external and internal communication efforts. Implementation will also require CBP to evaluate how it is progressing towards meeting the strategic framework.

It is the obligation of every supervisor to explain and hold employees accountable for the principles of the *Integrity Strategy*. CBP is aware that factors will influence and challenge the *Integrity Strategy's* execution and will continually monitor and improve it to meet the evolving needs of the Agency. CBP's Integrity IPCC will develop an execution plan, with timelines and milestones within 120 days of issuance of the *Integrity Strategy*. To evaluate how CBP is progressing towards meeting its goals and objectives the Agency will utilize issue and trend analysis and internal operational performance measures. CBP will continue to enhance the scope and complexity of these methods to make certain it is on track, especially as it adjusts operational capabilities. Below are summaries of each of these methods.

### ***Issue and trend analysis***

Analysis is a powerful tool to spot trends, identify weaknesses and strengths within the Agency, and proactively plan to tackle future problems before they arise. CBP tracks corruption and misconduct data across the Agency that can be used to detect, and deter activity. Post-corruption, behavioral and analytical research methods are being incrementally utilized to flag indicators of potential misconduct. CBP utilizes the results to mitigate and make corrective action plans for a particular area of improvement Agency-wide whether it be organization, leadership, policy or a single instance. The findings provide situational awareness to senior leaders and improve detection, deterrence, and prevention efforts.

### ***Internal operational performance measures***

An essential element of the *Integrity Strategy* is the development and continual refinement of comprehensive, demanding, and results driven performance measures that document CBP's progress towards achieving the *Integrity Strategy's* goals and objectives. This approach requires offices and the Integrity IPCC to evaluate existing measures and develop effective new measures that will determine the success of the *Integrity Strategy*. Upon completion, these measures will be appended to the *Integrity Strategy*.

The Integrity IPCC will direct efforts to create and develop performance measures for each functional area of the *Integrity Strategy* – Prevention, Detection, Investigation, and Response. Developing measures will allow CBP to assess the effectiveness of the integrity management program, as outlined in the *Integrity Strategy*, throughout the Agency. The development of these measures is being pursued through working groups consisting of internal stakeholders.

# CONCLUSION

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The Agency requires a unified approach to proactively address the broad spectrum of threats to the integrity of our workforce. This layered approach forms the backbone of all CBP integrity and counter-corruption policies and operations. CBP implements this approach by establishing a cross-Agency effort to comprehensively sustain a robust culture of integrity. Employees must understand that they are personally invested and responsible for the integrity of our Agency. Any violation of integrity, whether on or off duty, is inconsistent with and contrary to the Agency's law enforcement mission. Integrity is strengthened through integrated and comprehensive efforts to address corruption and misconduct at every level. Through their demonstrated commitment to integrity, leadership promotes employees' and organizational engagement in actively ensuring that this Agency continues to exemplify the highest standards of integrity.

As the baseline to CBP's anti-corruption efforts, the Agency will continue to refine this *Integrity Strategy* to amply address evolving threats. It is a guide for everyone within the Agency; enabling the development of effective programs and establishment of key priorities needed to achieve CBP's mission and end workforce corruption. CBP's employees operate in an environment in which even a single corrupt act represents a potential threat to national security. A culture of integrity and a strong, aggressive program to address corruption and misconduct are vital to the Agency, and to the Nation.

# APPENDIX A: Roles and Responsibilities

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CBP's mission is executed by various offices that have their own unique functions and lines of duty. Each CBP office is headed by a Senior Executive who oversees each function of that office. Integrity is important on every level of all CBP offices and each office is responsible for ensuring that their employees comply with the standards of conduct and this *Integrity Strategy*. To that end, it is essential that each office maintain and if not already done, renew their commitment to existing stakeholder partnerships and develop detailed guidance on roles and responsibilities for integrity-related program and positions. Relevant office responsibilities include:

- **Office of the Chief Counsel (CC):** Serves as the principal legal advisor to, and legal representative of, the Commissioner of CBP, and the officers and employees of CBP in matters relating to the activities and functions of CBP, and is responsible for all legal matters arising under the laws administered or enforced by CBP and serves as the Agency's Ethics Officer.
- **Office of Human Resources Management (HRM):** Ensure the efficient and effective delivery of services for the following processes: recruiting, assessing, and hiring candidates to fill critical agency positions; providing medical, benefits and work life advisory services and support; promoting a safe and healthy work environment; facilitating workforce level management and organizational effectiveness; and conducting CBP's labor and employee relations program.
- **Office of Internal Affairs (IA):** Oversight authority for promoting the integrity and security of the CBP workforce through applicant screening, polygraph examination, background investigation, and employee integrity investigations. IA also administers the internal security, integrity, and management inspections program.
- **Office of Administration (OA):** Responsible for all aspects of financial management for CBP. OA's Investment Analysis Office facilitates the development of performance measures and evaluates CBP's strategic and programmatic performance to provide leadership with insight into how effectively the organization achieves its mission.
- **Office of Air and Marine (OAM):** Protects the American people and the Nation's critical infrastructure through the coordinated use of integrated air and marine forces to detect, interdict and prevent acts of terrorism and the unlawful movement of people, illegal drugs and other contraband toward or across the borders of the United States.
- **Office of Border Patrol (OBP):** Protects the Nation by reducing the likelihood that dangerous people and products enter the United States between the ports of entry. The U.S. Border Patrol has a workforce of over 21,000 agents assigned to patrol the more than 6,000 miles of America's land borders. Several OBP integrity programs include: Headquarters Integrity Advisory Committee, established Ethics Committees at the field level and campaign levels, and initiating a collaborative effort with AMSCO.
- **Office of Congressional Affairs (OCA):** Advises executive leadership and managers on legislative and congressional matters and assists members of Congress and their staffs in understanding current and proposed CBP programs including integrity related issues.
- **Office of Field Operations (OFO):** Oversees nearly 28,000 employees with more than 22,000 dedicated and vigilant officers and agriculture specialists that protect U.S. borders. OFO manages 20 field operations offices; 328 distinct ports of entry; 15 preclearance stations; immigration policy and programs; and agricultural quarantine inspection at all ports of entry. Several OFO integrity programs include: AMSCO that has developed proactive methodologies and tools to identify data trends and patterns that may be indicative of integrity issues. OFO also created the Integrity Officer position which supports each Director, Field Operations with implementation of field Integrity efforts and has established a cross-organizational Integrity Committee.

- ***Office of Public Affairs (OPA)***: Communicates CBP's mission and operations to the American people, members of the trade and travel communities, other government agencies, foreign governments, as well as CBP employees. OPA develops communication strategies to ensure consistent messaging and organizational integrity.
- ***Office of Policy and Planning (OPP)***: Plans, organizes and directs team and task force efforts across CBP in support of the Commissioner's priorities. IA and OPP co-chair the Integrity IPCC to strengthen integrity programs within CBP components and to ensure coordination across the Agency and is the facilitator for the CIC.
- ***Office of Training and Development (OTD)***: Ensures that all training efforts support the CBP mission and strategic goals, meet the needs of a diverse and dispersed workforce, and contribute to measurable outcomes and results. OTD directly executes career development programs, basic and advanced training to all occupations and management and executive development programs.
- ***Privacy and Diversity Office (PDO)***: Promotes and ensures compliance with Federal civil rights and civil liberties laws, regulations, and Executive Orders by providing a policy framework for diversity, inclusion, and employee engagement initiatives, civil liberties compliance and complaints management for CBP.