



Resource Optimization at Ports of Entry

Fiscal Year 2015 Report to Congress
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Homeland
Security

U.S. Customs and Border Protection

Executive Summary

The Office of Field Operations (OFO) is the law enforcement component within CBP responsible for carrying out CBP's complex and demanding border security mission at all ports of entry (POEs). OFO manages the lawful access of people and goods to our Nation by securing and expediting international trade and travel. Continued growth in international trade and travel, expanding mission requirements, and new facility demands continue to strain CBP resources and our efforts to secure the homeland.

This report outlines challenges faced by CBP and progress on the implementation of our ROS, which is CBP's robust, integrated, long-term strategy for improving POE operations. The ROS has three components: optimize current business processes; utilize the WSM to identify staffing requirements; and implement alternative funding strategies to improve the adequacy of user fees to more effectively support operations. Within this report, CBP provides updates on our business transformation initiatives (BTIs), the BTIs' impact on staffing requirements, the updated WSM staffing projections, and our ongoing efforts to implement funding strategies that complement the FY 2014 appropriation of 2,000 CBPOs.

This report also introduces the AgRAM and the FY 2015 CBPAS staffing requirements. The AgRAM is a workload and risk-based objective management tool designed to project staffing requirements for CBPAS and CBPAS Canine Teams in support of CBP decision-making and budget planning. By combining the WSM for CBPOs and the AgRAM for CBPAS, CBP is now providing an integrated approach to staffing requirements and funding strategies at POEs.

While business process improvements and increased CBPOs have been successful, the updated WSM results continue to show a need for additional capability in order to fully meet the standards set by statute, regulation, and CBP policies, assuming maintenance of current processes, procedures, technology, and facilities. The most recent results – factoring in the additional 2,000 CBPOs from the FY 2014 appropriations – show a need for 2,624 additional CBPOs through FY 2016. The AgRAM shows a need for an additional 723 CBPASs.

The FY 2016 President's Budget addresses the staffing needs identified in the ROS by supporting a combination of increases to user fee rates, adjustments to fee accounts, and funding for additional inspection equipment. The Budget also supports CBP's BTIs, which have saved or is estimated to save over 700,000 inspectional hours.



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I. Background

Since 2008, there have been significant increases in inbound travel and trade volumes. U.S. Customs and Border Protection (CBP) processed nearly 375 million passengers in the land, sea, and air environments in FY 2014, up from 362 million in FY 2013. International air passenger volume increased by over 17 percent between FY 2009 and FY 2014 and is currently at a record level. CBP estimates more than 115 million international air passenger arrivals in FY 2016 (comprised of 43 percent U.S. citizens and 57 percent foreign nationals). In FY 2014, \$2.46 trillion worth of goods were processed through the ports of entry (POEs). Inbound trade volume grew by more than 24 percent between FY 2010 and FY 2014 (\$1.99 billion) and is expected to exceed previous records in the air, land, and sea environments in FY 2016.

CBP's Resource Optimization Strategy (ROS) was introduced in the *FY 2012 Resource Optimization Strategy at Ports of Entry* with three pillars: identify staffing requirements accurately, reduce those staffing requirements by transforming business processes, and develop strategies to fund the required staff. As a result of Office of Field Operations' (OFO) ROS, today over 99 percent of inbound vehicle traffic is processed by second generation License Plate Readers, Radio Frequency Identification (RFID) readers, and improved primary processing applications. Over 23 million travelers have obtained RFID-enabled documents to take advantage of the new technologies. In FY 2014, CBP expanded deployment of a variety of mobile, fixed, and tactical License Plate Readers to Southwest border crossings and U.S. Border Patrol checkpoints. CBP also expanded the use of kiosks, which automate document queries for land pedestrians to five major crossings, and delivered long overdue technology upgrades to the pedestrian processing environment. For international air travelers, CBP joined in partnership with the private sector to expedite pre-processing kiosks called Automated Passport Control (APC), which eliminated an additional paper entry form. International travelers continue to embrace CBP trusted traveler programs with increased membership and usage reducing overall resource requirements. The quantifiable results from these savings are demonstrated throughout this document.

In FY 2014, the President and Congress recognized CBP's staffing needs and provided funding for 2,000 additional CBP Officers (CBPOs) in the FY 2014 budget. The first classes of new CBPOs are beginning to deploy. As of January 2015, 586 of the 2,000 new CBPOs are onboard. CBP is actively working to recruit and hire the additional 1,414 CBPOs. CBP is aggressively pursuing quality candidates, as well as taking steps to reduce attrition rates in an effort to meet the target by the end of FY 2015. By December 2014, approximately 8,000 applicants entered the pre-employment process. Additionally, two more CBPO job announcements will be published in April and July 2015. The 2,000 CBPOs will go a long way towards addressing the current challenges and supporting additional requests for services. However, as demonstrated by the Workload Staffing Model (WSM) and CBP Agriculture Resource Allocation Model (AgRAM), CBP continues to have a significant gap in achieving optimal staffing levels for both CBPOs and CBP Agriculture Specialists (CBPASs).

The third prong of CBP's ROS is to implement alternative funding strategies to increase revenue sources to support increased staffing. CBP continues to seek the authorization of user fee

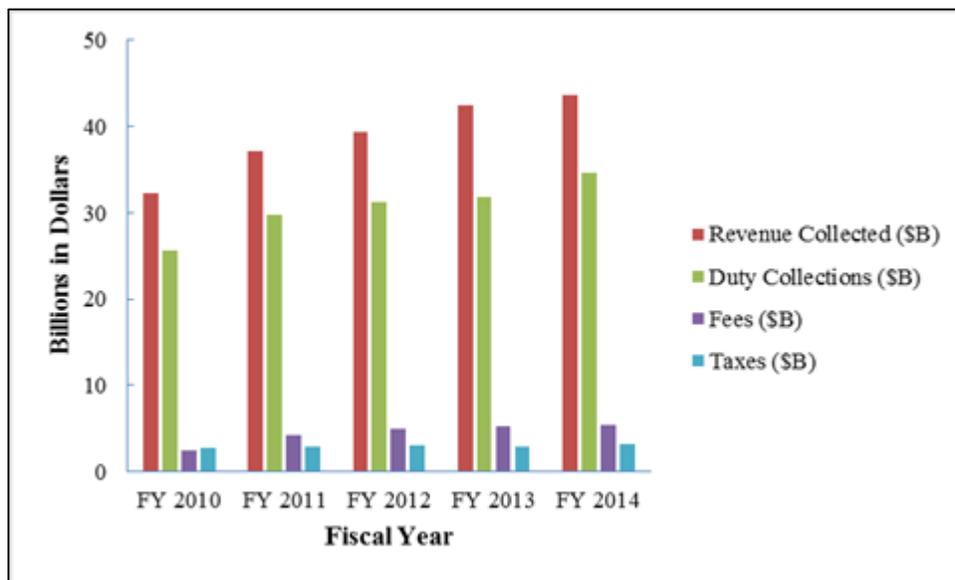
increases to achieve full cost recovery. CBP also supports the CBP Reimbursable Services Agreement program established under the authorities provided in Section 560 of the *Consolidated and Further Continuing Appropriations Act, 2013* (P.L. 113-6). This program has funded over 52,000 inspectional hours to expedite trade and travel by opening additional booths and lanes and releasing cargo. In FY 2014, Congress enacted law that furthered this concept, Section 559 of the *Consolidated Appropriations Act of 2014* (P.L. 113-76). It authorizes CBP, in collaboration with the U.S. General Services Administration (GSA), to conduct a 5-year pilot program to enter into partnerships with private sector and government entities for certain reimbursable services and to accept certain donations.

II. Economic Impact of CBP Staffing

A. Benefits of Trade and Tourism

CBP is one of the largest revenue sources to the Federal Government. CBP collected more than \$43 billion in revenue during FY 2014, an increase of 47.8 percent since FY 2009.

Table 1: Revenue Measures



International travel and trade is vital to the U.S. economy. It is one of the largest exports for the United States and generated a travel trade surplus of \$78.1 billion in 2013. International visitors infuse the U.S. economy with funds by purchasing U.S. goods and services. In 2013, international visitors spent \$214.8 billion on U.S. travel and tourism-related services¹. All of those purchases are considered U.S. exports that ultimately support America's trade balance. From January to June 2014, international visitors spent \$112.8 billion on U.S. travel and tourism-related services, an increase of 6.2 percent over the same period in 2013². Every one of these visitors entered the United States through the facilitation of a CBP Officer.

CBP is responsible for enforcing intellectual property rights laws. Intellectual property industries account for \$5.06 trillion in value added (increases to Gross Domestic Product (GDP)), or 34.8 percent of U.S. GDP. Intellectual property rights violations cause financial losses for rights holders and legitimate businesses around the world.

¹ "Key Facts about International Travel and Tourism to the United States," December 2014, U.S. Department of Commerce, International Trade Administration, Industry & Analysis, National Travel and Tourism Office.

² 2014 U.S. Travel and Tourism Statistics (Inbound), Monthly Spending (Exports/Imports), Office of Travel & Tourism Industries.

The agriculture industry is the largest employing sector in the United States with more than \$1 trillion in economic activity annually. The greatest risks to the success of this industry are exotic plant pests and foreign animal diseases. Currently, invasive species cause an estimated \$136 billion in economic and environmental losses annually. This includes domestic losses in production and quality, as well as loss of global export markets and jobs for America's agriculture industry. These pests and diseases could be introduced into the United States through commodities such as meats, animals, animal products, fruits, vegetables, plants, soil, seeds, and plant-based handicrafts.

It only takes one vial of a potentially deadly, infectious, or pathogenic organism to destroy the U.S. forestry, grain, or animal (cattle, swine, and poultry) industries with consequential billions of dollars of loss in economic revenue, compounded by the length of time to recover from such catastrophe. CBPASs have the specialized training needed to perform CBP's Agriculture Quarantine Inspection (AQI) operations and pest exclusion activities, ensuring compliance with plant and animal health regulations. Additionally, CBPOs are trained to identify agriculture risk and can contact an agriculture program manager at the field office should guidance be needed to mitigate agriculture risk. They are currently stationed at 174 of our 328 POEs.

B. Travel and Tourism Initiative

CBP recognizes our key role in ensuring the growth of our economy and the implications of our complex and challenging mission to balance enforcement priorities with travel and trade facilitation. CBP is equally as cognizant of the economic impact of wait times and the opportunities to improve this area of CBP processing. Therefore, one of CBP's key priorities is to support the President's efforts to increase travel and tourism in the United States – helping local businesses and growing the economy for everyone. The President announced the National Travel and Tourism Strategy in 2012, with a reiteration of this strategy in May of 2014, which set an ambitious goal of attracting and welcoming 100 million international visitors annually by the end of 2021. In addition, the Departments of Commerce and Homeland Security's report to President Obama, titled "Supporting Travel and Tourism to Grow Our Economy and Create More Jobs: a National Goal on the International Arrivals Process and Airport-Specific Action Plans," published in February 2015, established a new interagency task force, co-chaired by the Deputy Secretaries of Commerce and Homeland Security. The objective of the task force is to work with stakeholders in identifying new and innovative steps to improve the entire international arrivals process and develop 17 airport-specific action plans to streamline the entry process at the nation's top airports, while also strengthening the priority national security mission.

CBP plays a key role in this strategy and has already taken many steps to achieve the President's primary objectives of strong national security, improved international arrivals processes, and welcoming more international visitors. To address travel growth, while securing our borders and international aviation, CBP has launched a number of Business Transformation Initiatives (BTIs) designed to make the international traveler arrivals process more secure, transparent, seamless, and passenger directed. Over the past two years, CBP has eliminated the I-94 and I-94W form, saving over several seconds per inspection for over 30 million travelers; launched APC; expanded membership in Global Entry (GE); began a pilot program for Mobile Passport Control

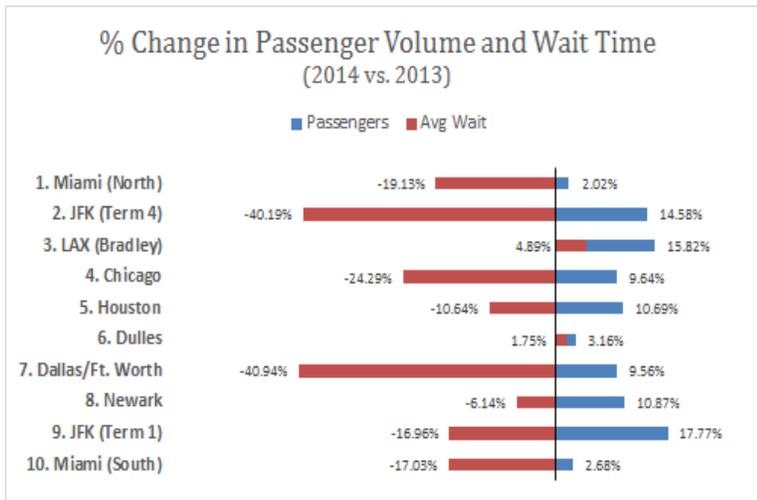
(MPC); and will be testing the elimination of the paper Customs Declaration Form 6059B and modified egress processes.

To succeed in travel facilitation will require an unprecedented level of cooperation seen not only across federal, state, and local government, but also with the private sector. With this in mind, CBP actively engaged with the Department of Commerce and stakeholders to develop strategies at the top 17 airports for international air arrival volume in FY 2013. The action plans reflect concrete steps that both the government and private sector will take to improve the international arrivals process in their own airport community.

The goal is to achieve progress consistent with those achieved at Dallas Fort Worth and Chicago O'Hare airports where, through a combination of streamlining processes and upgrading technologies, wait times were reduced significantly. Chicago O'Hare International Airport partnered with CBP on improved queuing, signage, passenger flow, promoting GE, and critically, APC kiosks. The results have been dramatic. Despite seeing a 9.64 percent increase in passenger volumes in comparison of FY 2013 to FY 2014, Chicago O'Hare International Airport realized a 24.27 percent decrease in wait times from FY 2013 to FY 2014 through a 38 percent increase in APC kiosk and GE usage.

At Dallas-Fort Worth International Airport, international arrivals have grown 16 percent over the past year and 39 percent over the last 4 years, the most of any top 20 airport during that stretch. The airport partnered with CBP not only on queuing, signage, passenger flow, promoting GE and APC kiosks, but also on a reimbursable agreement for enhanced CBP services. As in Chicago, the results have been tremendous. Dallas-Fort Worth International Airport reduced wait times 40.94 percent from FY 2013 to FY 2014 and achieved an APC kiosk and GE usage of 46 percent.

C. Economic Impact of Wait Times at POEs



Workload at the POEs has increased dramatically since the global economic downturn in FY 2009. Arriving international air passenger volume is up 22 percent since FY 2009, reaching a record 107 million in FY 2014, and is expected to grow at a 4 percent to 5 percent rate for the next several years. The POEs processed 25.7 million cargo containers in FY 2014, representing a 24 percent increase since FY 2009. CBP also processed over 100 million

arriving personal vehicles at land POEs in FY 2014. Despite this growth, CBP has effectively managed wait times. While air passenger volume increased by 4.7 percent in FY 2014 alone, wait times decreased 13 percent. In the land environment, the continued success of Active Lane Management, stacked booths, and other BTIs combined to reduce wait times for vehicles despite a 5.5 percent increase in Southwestern border traffic.

CBP's performance at the 10 busiest international air terminals highlights these successes. In FY 2014, all top 10 air passenger terminals experienced passenger growth and yet only 2 terminals, Los Angeles-Bradley and Dulles-Main, experienced wait time growth (average of 3.3 percent). CBP credits this success to the combined impact of APC kiosks and GE enrollment. For example, the terminals with the largest decreases in average wait time (Dallas-Fort Worth, John F. Kennedy (JFK) – Terminal 4, and Chicago O'Hare) also rank among the terminals with the highest percentages of kiosk and GE usage at 46 percent, 37 percent, and 38 percent, respectively. Compared to FY 2013, traffic at the top 10 terminals has increased 9.6 percent and average wait times decreased by 19.5 percent (from 27.2 to 21.9 minutes). This large drop reflects a 4.9 second decrease in cycle time per passenger generated by increased APC and GE usage. The decrease in cycle time has allowed CBPOs to process three extra passengers per booth per hour. Although major strides have been made in FY 2014, CBP still faces significant challenges in the air passenger environment due to ever-growing traffic that may outpace process improvements.

On the land border, passenger vehicle wait times continued to decline from a 1.27 percent decrease from FY 2012 to FY 2013 to a nearly 2 percent decrease from FY 2013 to FY 2014. In addition, the wait times for pedestrians decreased significantly, by almost 11 percent from FY 2013 to FY 2014, after an increase of nearly 5 percent between FY 2012 and FY 2013. Conversely, the wait times for commercial vehicles increased 10 percent from FY 2013 to FY 2014 after a decrease of approximately 2 percent from FY 2012 to FY 2013. See Table 2 below.

Table 2							
Land Border Wait Times Average (Minutes)							
	FY 2011	FY 2012	Percent Change	FY 2013	Percent Change	FY 2014	Percent Change
Commercial Vehicle	4.49	4.43	-1.40%	4.34	-1.95%	4.79	10.33%
Pedestrian	8.55	9.26	8.34%	9.71	4.81%	8.65	-10.89%
Personal Vehicle	12.47	12.79	2.59%	12.63	-1.27%	12.39	-1.87%
Commercial Vehicle Percent Change from FY 2011					-3.32%		6.67%
Pedestrian Percent Change from FY 2011					13.55%		1.18%
Personal Vehicle Percent Change from FY 2011					1.29%		-0.60%

Recent research shows that there is a clear economic impact by reducing wait times at POEs. Long wait times at the POEs can cause delays and travel time uncertainty for automobiles, trucks, pedestrians, and air passengers. The delays can add to supply chain and transportation costs for commercial companies and also serve as a deterrent to trade and cross border travel. As a result, wait time reduction can be a significant economic stimulus for trade and travel.

The extent to which wait times affect the local and national economy was most recently studied by the National Center for Risk and Economic Analysis of Terrorism Events (CREATE), a DHS Center of Excellence. CREATE issued a report in February 2013, titled “The Impact on the U.S. Economy of Changes in Wait Times at Ports of Entry.”³ Their analysis found that an increase or decrease in staffing at the POEs has an impact on wait times and, therefore, on the U.S. economy. In summary, CREATE studied the impacts on the U.S. economy of adding 33 CBPOs (their baseline), and the correlating reduction in wait times resulted in a \$65.8 million increase in GDP, \$21.2 million in opportunity cost savings, and 1,094 annual jobs added.

CREATE supplemented this analysis with a report, titled “Analysis of Primary Inspection Wait Times at U.S. Ports of Entry,” published on March 9, 2014. This study found the impacts on the U.S. economy of adding 14 CBPOs (one each at 14 major airport terminals) are a potential \$11.8 million increase in GDP and 82 annual jobs added. The value of wait times saved for existing passengers could be as much as \$9.0 million.

D. Impact of Focused Resource Allocation

As discussed above, the economic impact of wait times are significant. Over the past two summers, CBP effectively managed and reduced wait times during the peak travel season, even when constrained by funding challenges resulting from sequestration during the summer of 2013. We deployed significant changes to CBP’s operations strategy to help avoid gridlock at international airports with the use of predictive analysis, realigned resources throughout the calendar year, strategic trade-offs with trade operations, and a variety of BTIs, thereby avoiding predicted multi-hour wait times.

During the summers of 2013 and 2014, CBP intentionally prioritized the processing of passengers over other mission areas, thereby reducing the impact of no additional staffing. To avoid impacts to security, CBP strategically reassigned personnel from trade and cargo

³ “The Impact on the U.S. Economy of Changes in Wait Times at Ports of Entry,” CREATE, University of Southern California, released April 4, 2013.

operations, which not only supported primary passport control processing but also helped to maintain a strong passenger enforcement posture at the POEs. While this measure increased CBP's ability to meet the increased volume of flights and passengers at major gateway airports, it is not a sustainable effort as operations in the cargo environments suffered from the reallocation of staff. For instance, the seaports that shared resources with some of the top airports in the summer of 2013 saw a decrease compared to the summer of 2012 in a number of key cargo enforcement measures, including container exams (down nearly 17 percent), container exam rate (down over 19 percent), and drugs seized (down over 60 percent). Similar decreases occurred during the summer of 2014.

In addition to the reallocation of resources to passenger operations, CBP effectively managed limited overtime expenditures and stringently focused on more efficient scheduling and collaboration with air carriers to mitigate peak arrival periods. Efforts such as the use of CBP's Automated Wait Time Scheduling Tool, not previously available during peak summer periods, allowed CBP to apply sufficient staffing in advance of and during peak periods, which helped to mitigate wait times. This tool is populated with airline and CBP data to help improve operations and scheduling functions at the POEs.

CBP's implementation of the Automated Wait Time Scheduling Tool BTI was accompanied by the increase in GE enrollment and usage, as well as the implementation of the newly emerging APC kiosks that expedited air passenger inspection for U.S. and Canadian citizens at participating airports. CBP also automated another paper arrival form required for all foreign visitors arriving from a non-visa waiver country, CBP Form I-94.

In addition to these BTIs, the efforts over the last two summers included trade-offs that cannot be sustained long term because they have a direct impact on CBP's trade mission and a number of other activities, including outbound enforcement, special operations, Intellectual Property Rights enforcement, training and administrative duties, and general aviation requests. Due to the continued delays in the hiring of the 2,000 additional CBPOs funded by *the Consolidated Appropriations Act, 2014* and ongoing challenges to hire and onboard the additional CBPOs required through the end of fiscal year 2016, CBP anticipates the necessity of continuing to work within such a trade-off environment during the 2015 summer travel season.

III. Business Transformation Initiatives

CBP continues to develop BTIs in support of the ROS. BTIs are an important pillar of the ROS because they allow CBP to realign CBPO and CBPAS resources to priority initiatives. BTIs also reduce CBP's required inspection hours, resulting in a decrease of overall workload requirements and equivalent staffing that creates a cost avoidance of the CBPOs' or CBPASs' salaries and expenses.

CBP launched a number of transformation initiatives in FY 2014 designed to make the international traveler arrivals process transparent, seamless, and passenger-directed. CBP transformation efforts have focused on faster processing in the air, pedestrian, vehicle, and cargo environments. With technology becoming ever-present in all work environments, CBP has made a concerted effort to implement the newest and most efficient technology at the Nation's POEs. Along with technological advancements, CBP has deployed biometrics, processing enhancements, and – in the air environment – low-risk passenger prescreening.

A. Resource Optimization Efforts

The following provides descriptions of priority BTIs and the associated cost savings achieved in FY 2014.

1. APC kiosks – Reduce inspection and wait time by up to 40 percent

APC kiosks are a key transformative initiative in the air environment that have dramatically reduced inspection times by as much as 40 percent in some locations. This BTI also highlights an innovative and creative partnership with industry as the kiosks are purchased and deployed by airports in consultation with CBP. The APC kiosk allows a traveler to voluntarily provide their biographic information prior to the primary inspection process. CBP backend systems vet the traveler in real time and provide a response printed on a receipt that the traveler will provide to the CBPO. CBPOs still inspect the travelers to verify the purpose and intent of travel, among other things. However, the self-service kiosk removes the administrative responsibility for a CBPO to scan a traveler's document, allowing for shorter processing times and allowing the CBPO to focus on core law enforcement functions. CBP has determined that APCs have reduced CBP officer inspection time by approximately half and the users' wait has been reduced to under 10 minutes in most cases. In FY 2014, more than 19 million travelers at 22 different international airports used one of over 600 APC kiosks, of whom 80 percent were confirmed and received facilitated processing. CBP is implementing APC in four phases. During Phase I and II, APC kiosks were only available to U.S. citizens and Canadian visitors. In January 2014, Phase III extended APC availability to visa waiver passengers. CBP is developing Phase IV, which will extend availability to international visitors who are traveling on pleasure or business visas. Ten airports are actively working with vendors to implement Phase IV in FY 2015. Accelerated APC implementation at international airports saved over 130,000 inspectional hours by eliminating the administrative portion of the passenger inspection. This savings resulted in savings equivalent to 110 CBPOs.

2. Preclearance – Expands to 15 locations

Preclearance allows CBP to inspect and clear commercial air passengers and their goods at 15 locations in 6 foreign countries. Travelers inspected and cleared overseas do not have to undergo a second CBP inspection upon arrival in the United States. All mission requirements are generally completed at the preclearance location prior to departure, including customs, immigration, and agriculture inspections. In FY 2014, preclearance processed over 16 million travelers at international preclearance locations. CBPOs at preclearance locations are dedicated primarily to air passenger processing; therefore, they process approximately 60 percent more passengers than their stateside counterparts. In addition, the average cost to inspect and clear a passenger prior to entering the United States is approximately 30 percent less than the cost to perform the same inspection at domestic airports. Preclearance locations add to CBP's layered enforcement posture while reducing operational costs. Overall, preclearance locations offer the opportunity to detect and intercept inadmissible passengers before arrival at U.S. POEs. These passenger interceptions result in cost avoidance for the U.S. Government in terms of detention, processing, and repatriation, as well as support costs generally associated with domestic apprehensions. Building upon the success of existing preclearance operations and the strategic path of expansion, CBP has a goal of pre-clearing thirty-three percent (33 percent) of all U.S.-bound air travelers by 2024. CBP is currently evaluating proposals for new preclearance locations and will identify new locations in FY 2015.

3. National Targeting Center (NTC) – Saved CBP over \$2.2 million in FY 2014

In FY 2014, the CBP NTC, the Immigration Advisory Program and the Joint Security Program prevented 11,494 inadmissible or high-risk passengers from boarding U.S.-bound flights, a 2 percent increase over FY 2013. These actions enabled the air industry to avoid expenses exceeding \$28.7 million (11,494 passengers x \$2,500 per passenger). These targeting successes eliminated 22,988 inspectional hours, the equivalent of 19 CBPOs and a cost avoidance of an estimated \$2.3 million in salaries and expenses.

NTC is also testing a new program, Pre-Verify Hotlist, to expedite passenger processing. The Pre-Verify Hotlist Pilot matches Advance Passenger Information System manifest data against the DHS Biometric Watch List prior to the departure of travelers from foreign airports, enabling NTC to identify and remove lookouts for travelers who are determined not to be a match to a watch-listed individual. This effort saves time by facilitating lawful travel and avoiding unnecessary inspections of legitimate travelers while concurrently identifying inadmissible travelers who are not detected through biographic screening. The pilot initially included only Miami International and JFK airports. For FY 2015, the pilot has been expanded to include the Hartsfield-Jackson Atlanta International, Houston Intercontinental, and Los Angeles-Bradley International airports, with expansion to all air POEs scheduled in the near future. During FY 2014, the pilot enabled Miami International Airport and JFK to avoid, respectively, 12,888 and 13,161 unnecessary inspections, saving an estimated 4,500 hours (3.6 CBPOs).

CBP also implemented the National Agricultural Cargo Targeting Unit at the NTC-Cargo. National agricultural targeting is conducted by CBP's Agriculture Programs and Trade Liaison CBPAS staff independently and in partnership with the Commercial Targeting and Analysis Center. Housing the National Agricultural Cargo Targeting Unit at the NTC-Cargo strategically

leverages the force multiplier effect realized between personnel of varying backgrounds and disciplines within CBP. Close proximity of CBPO and CBPAS targeting experts facilitates information sharing, enhances targeting outcomes, and leverages CBP technology and intelligence systems resources.

4. Electronic System for Travel Authorization (ESTA) – Saved over 18,000 inspectional hours

Individuals traveling under the Visa Waiver Program must apply for travel authorization through ESTA prior to boarding an aircraft destined for the United States. If an applicant is denied an authorization he or she must apply for a visa in order to travel to the United States. ESTA realized continued savings in CBPO resources in FY 2014. There was a 22 percent increase (9,233 additional applications) in the denial of ESTA applications; as a result, CBP did not have to conduct lengthy secondary inspections or process refusals of admission for these individuals. The increased denials resulted in the marginal increase of approximately 18,500 inspectional hours, which is equivalent to 15 CBPOs and a cost avoidance of \$2.0 million in salaries and expenses.

5. Forms Automation – General Declaration – Automated 70 percent of commercial airline arrivals and departures

In September 2013, the Airport Wait Time (AWT) Console system began hosting the Paperless General Declaration (Gen Dec) system, which allows participating carriers to be exempt from the requirement to submit a paper CF-7507 (Aircraft General Declaration) and form I-92 upon arrival at U.S. POEs. In January 2014, the program was expanded to include all international departures. This BTI has automated 70 percent of all commercial airline arrivals and departures, resulting in significant time savings for both CBP and participating carriers. It takes an average of 90 seconds for a CBPO to process a paper Gen Dec, which is required for each arrival and departure, and less than 5 seconds to process an arrival or departure in the Paperless Gen Dec system. In 2014, CBP processed an average of 2,400 Paperless Gen Decs each day through the Airport Management Console – Paperless Gen Dec program. This program saved over 20,000 inspection hours with an equivalent savings of 17 CBPOs and avoided \$2.0 million in salaries and expenses.

6. Forms Automation – I-94s – Achieved an equivalent savings of 56 CBPOs

CBP automated form I-94 in the sea passenger environment in FY 2012. CBP expanded this automation to air passengers at the end of FY 2013. This form was previously required upon entry into commercial airports for non-immigrant visitors not traveling from a Visa Waiver Program country. The data collected from the Form I-94s have been used for over 20 years as a key source of information regarding immigration status. The automation of the Form I-94 in the air environment has significantly improved the accuracy and timeliness of the data because the I-94 is created in real time using the same information the CBPO uses for the primary inspection. The elimination of the paper Form I-94 decreased the time spent processing visitors from non-visa waiver countries arriving on commercial airlines by an average of 8.5 seconds when comparing the same timeframe in calendar year 2013. This savings is the equivalent of 73 CBPOs, which is an incremental savings increase of 56 CBPOs in FY 2014. In addition to

the CBPO savings, CBP avoids an annual cost of \$12.0 million to \$15.0 million in data entry costs to process the forms.

7. Forms Automation – I-418 – Eliminates paper crew manifest for commercial vessels

CBP has now fully automated the I-418, which is a paper passenger and crew manifest for commercial vessels. CBP successfully created a geospatial view of all commercial vessels worldwide, including high-risk vessels, via Google Earth mapping tools employed through the Vessel Risk List and Tracker project, which enables this form's automation. The development of the project is a collaborative effort involving the NTC, U.S. Coast Guard, and CBP. This project has supported the automation of the I-418 and allows CBPOs to efficiently record passenger/crew inspection and admissibility results without having to process and store actual paperwork. The I-418 functionality saved CBP over 140,000 inspectional hours, the equivalent to 118 CBPOs in FY 2014, which was the first full year of implementation.

8. CBP Mobile – 4,269 devices procured and 1,250 deployed

The CBP Mobile Program is an enterprise-focused program with the strategic vision to add mobility to mission critical CBP operations. The deployment of appropriate real time technology removes the constraints of time and location facing all CBP frontline personnel in the performance of their duties and the execution of CBP's mission. The mobile devices include the handheld license plate/document reading device (MC75A) for the land border; Enforcement Link Mobile Operations; flexible web-based applications for all passenger and cargo processing; and the Secure Electronic Enrollment Kit, a comprehensive, multimodal identification and enrollment platform for Border Patrol. The use of mobile devices facilitate enforcement actions, including identification of subjects of National Crime Information Center warrants and the interdiction of undocumented aliens, narcotics interdictions, unreported currency, and weapons violations. In addition, the mobile devices significantly decrease time delays due to travel time between terminals and warehouse inspections. Perishable cargo is released up to 4 hours sooner using the mobile devices.

During FY 2014, the CBP Mobile program procured 4,269 devices (ruggedized 7- and 10-inch tablets, smart phones, handheld biometric scanning peripherals, iPads, handheld License Plate Readers and document reading devices, and handheld multi-modal biometric capture devices). CBP provided 1,250 iPads to the CBP Field Operations Academy to eliminate printing student manuals and the remaining devices will be deployed during FY 2015. In FY 2014, the current Enforcement Link for Mobile Operations program resulted in savings equivalent to 18 CBPOs and over 16,000 inspectional hours.

9. Ready Lanes – Reduces participant wait time up to 50 percent

RFID enabled document growth continues at a rapid pace. Over 22 million travelers have obtained RFID-enabled documents (passports, enhanced driver's licenses, etc.), and two-thirds of all southern border crossings are now made with an RFID document. This growth has enabled the expansion of 3 additional Ready Lanes in FY 2014 for a total of 25 lanes. Ready Lanes process vehicles 12 to 18 seconds faster than general lanes and, in conjunction with Active Lane Management, can reduce participant wait time up to 50 percent.

10. Pedestrian Ready Lanes – More than 28 percent faster than general lanes

The first pedestrian Ready Lane opened in December 2011, but until mid-2013, the percentage of pedestrians using Ready Lane kiosks remained less than 10 percent. Since then, expansion to large pedestrian crossings such as Brownsville, Nogales, Calexico, Laredo, and San Ysidro has enabled Ready Lanes to process almost half of all pedestrian traffic (46 percent) on the Southwestern border. CBP estimates that over 50 percent of pedestrians will be processed with the new technology by the end of FY 2015.

Average pedestrian Ready Lane cycle time (the elapsed time from one admit/refer decision to the next) is 27.9 seconds, compared to 36.1 seconds for general lanes. At the 10 locations with kiosks, Ready Lane pedestrian travelers wait an average of 13 minutes compared to general lane pedestrians who wait an average of 25 minutes. Faster processing time and increased throughput has contributed to shorter wait time at locations with kiosks. CBP estimates pedestrian Ready Lanes increasing operational capabilities equivalent to adding 21 CBPOs and \$2.5 million in cost avoidance of salaries in FY 2014.

11. Trusted Traveler Programs

CBP continues to promote the expansion of trusted traveler programs that allow CBPOs to focus their efforts on areas of greatest risk while providing an expedited process for travelers deemed low risk. In FY 2014, the Trusted Traveler Programs saved the equivalent of 20 CBPOs (aggregate to the equivalent savings of 211 CBPOs in FY 2012 and FY 2013). This is a cost avoidance of \$2.4 million in salaries and benefits.

- a. **GE – 42 Percent increase in usage** – In FY 2014, GE kiosk usage increased by 1.4 million users at 42 U.S. airports and 12 preclearance locations, a 42 percent increase over FY 2013 (4.7 million uses vs. 3.3 million uses). The increased kiosk use by arriving travelers resulted in savings equivalent to an additional 11 CBPOs in FY 2014.
- b. **Secure Electronic Network for Traveler’s Rapid Inspection (SENTRI) – 39 seconds faster than general traffic lanes** – In FY 2014, the average SENTRI lane processing time was more than three times faster than the Southwestern border general lane average (18 seconds vs. 57 seconds). The four second reduction in processing time since FY 2013 (when the average SENTRI lane processing time was 22 seconds) represents an 18.1 percent times savings per SENTRI crossing in FY 2014. This improvement more than compensated for the 10 percent increase in SENTRI lane crossings (1,261,212) and resulted in inspection time savings equivalent to 9 CBPOs, which is a cost avoidance value of approximately \$1.1 million in salaries and expenses.
- c. **NEXUS – 25 seconds faster than general traffic lanes** – In FY 2014, NEXUS experienced an average processing time of 25 seconds, which is about two times faster than the general lane average (48 seconds per vehicle). Although there was a five-second decrease in processing time (from 30 to 23 seconds), a 12 percent increase in NEXUS lane crossings prevented any overall time savings from the previous year. However, the increased use of NEXUS lanes over the last 2 years (25 percent) has improved the combined throughput of all Northern border traffic lanes, and CBP expects an annual savings of 7 CBPOs through FY 2016. Continued membership growth for the NEXUS program will further increase efficiency.

12. Transforming Immigrant Visa Processing – Pilot launched in Montreal in FY 2014

CBP is working with the Department of State (DOS) and U.S. Citizenship and Immigration Services (USCIS) to transform the immigrant visa process, which is predominantly paper driven and based on the collection, transportation, and storage of hardcopy documents that are transferred between multiple agencies. The current process fails to utilize current technology advances and interfaces already shared by federal agencies, including the DOS Consolidated Consular Database, the Arrival and Departure Information System, and the United States Visitor and Immigration Status Indicator Technology program. The implementation of a paperless immigrant visa process will create a seamless, end-to-end process that streamlines transactions between agencies and beneficiaries, improves security, increases efficiency, and reduces the duplication of efforts.

DOS and CBP are ready to proceed with a paperless solution, as all the information in an immigrant visa packet is accessible electronically or can be captured electronically; however, USCIS is working on the capability of accepting and processing electronic documents, photos, and fingerprints. In order to prepare USCIS for an electronic immigrant visa process, a small pilot program in Montreal was launched on July 1, 2014. The pilot serves as a phased approach that will help USCIS move one step closer towards a paperless process. As of September 30, 2014, the U.S. Embassy in Montreal processed 167 immigrant visa packets as part of the pilot. After the 90-day period, CBP, USCIS, and DOS will evaluate the process and determine how to expand the pilot. Due to the delayed implementation of this initiative, there were no savings realized in FY 2014. However, once the immigrant visa process is fully automated, it has the potential to save over 100,000 inspectional hours (equivalent of 100 CBPOs).

13. Radiation Portal Monitor (RPM) Optimization – Reduced nuisance alarms by 74 percent

RPM Optimization has been fundamental to increasing the efficiency and accuracy of inspecting cargo. A review of the RPM process in FY 2013 found that a significant number of non-threat alarms create extra work for CBPOs and increase transaction costs for private stakeholders. CBP and external stakeholders developed a new approach for RPM operations consisting of recalibrated equipment that is projected to reduce non-threat alarms by 70-90 percent, varying by port. Based on the resulting analysis, CBP and Pacific Northwest National Laboratory, in coordination with the Domestic Nuclear Detection Office, developed a near-term, low-cost approach to eliminate the problem while maintaining the capability to detect appropriate threats.

In FY 2014, the RPM Revised Operational Settings initiative recalibrated RPMs at 17 POEs that comprise 90 percent of inbound maritime container volume and 93 percent of historical seaport RPM alarms. Deployments to recalibrate RPMs at Tacoma, Washington; Philadelphia, Pennsylvania; Wilmington, Delaware; and North Carolina are underway. To date, alarm rates have decreased at these seaports by 74 percent, which is 89,000 alarms. Year-long projections for the 17 POEs should eliminate about 146,000 false alarms. This initiative allowed CBP to transfer 35 CBPOs to other enforcement missions in FY 2014, and CBP estimates that recalibration will permit the reassignment of up to another 65 CBPOs through FY 2016. Moreover, the initiative will support a long-term reduction in secondary RPMs, thus avoiding future acquisition and maintenance costs of up to \$44.0 million over 10 years. RPM optimization will be deployed to seven additional seaports and to land border POEs in FY 2015.

14. National Agriculture Release Program (NARP) – Reduce low-risk inspections

CBPASs normally inspect 100 percent of the shipments of regulated agricultural commodities offered for entry into U.S. commerce. NARP was developed by the U.S. Department of Agriculture (USDA) Animal and Plant Health Inspection Service (APHIS) Plant Protection and Quarantine program (PPQ), in collaboration with CBP, to identify high-volume imports of regulated agricultural commodities that present a very low risk for the introduction of invasive plant, pests, and diseases. Based on risk evaluations, these commodities identified as high volume, very low risk can be inspected at a reduced rate, allowing the majority of the commodities to immediately enter U.S. commerce.

NARP is risk-based and allows for more efficient use of resources. A small percentage of low-risk shipments are intensively examined and the remainder of the shipments are released without inspection. Critical resources are redirected towards inspection of higher risk agricultural shipments and commodities. NARP is capable of quickly adjusting to changing risk profiles without compromising agricultural quarantine and plant health safeguards. NARP resulted in the reduction of over 186,000 inspection hours and the realignment of 131 CBPASs. CBP is in continuous dialogue with APHIS to incorporate additional commodities determined to be very low risk.

15. Development of Agriculture Integrated Data Management System (AIDMS) – Saved over 22,000 inspection hours for CBPASs

The centralized AIDMS is designed to streamline and integrate business processes while facilitating information sharing among CBP components and USDA APHIS. Historically, 33 percent of the CBPAS data entry processes were spent on manual, fallible, and duplicative entry of trade data into USDA APHIS Agriculture Quarantine Activity System databases.

CBP is leveraging the International Trade Data System (ITDS) and the Cargo Enforcement Reporting and Tracking System to launch the AIDMS. The AIDMS initiative automates the interaction between CBP and APHIS in the review and resolution of agriculture-related examination during cargo importation. CBP systems supply information to USDA APHIS electronically, removing the need for CBPASs to perform duplicative data entry. Once fully implemented, CBP conservatively estimates the total annual cost saving to be in excess of \$8.2 million and, consequently, allowing for the redeployment of resources to high-risk activities and operations.

The first phase of AIDMS was implemented in November 2013 through February 2014 and has resulted in the integration of exam records on several commodities. In FY 2014, a total of 1.4 million PPQ Form 280 records were created in ITDS, saving over 22,000 inspection hours or the equivalent of 15 CBPASs. Monetary savings realized as a result of implementation of phase one of AIDMS equates to \$1.6 million in savings at the national level, allowing CBP to redeploy critical resources to high-risk activities and operations. CBP continues to review and assess the impact of ITDS PPQ Form 280 deployment for potential improvements.

The second phase of AIDMS will be implemented in July 2015 and will integrate two additional forms into ITDS. Cargo Enforcement Reporting and Tracking System will be leveraged to

populate data automatically, which will result in a reduction of manual entry requirements by nearly 33 percent. When fully implemented, Phase II of AIDMS is expected to result in an additional savings of five full-time equivalent employees with an expected cost avoidance of \$580,000.

16. Vessel Risk List – Asian Gypsy Moth (AGM) targeting initiative

AGM is a serious pest that can be carried on cargo and conveyances. AGM populations are prevalent in some seaport areas in Far East Russia, Japan, Korea, and China. If introduced into the United States, AGM would pose a significant risk to forest resources, businesses that rely on these resources, and to U.S. global market access.

As of FY 2014, AGM targeting and maritime communication are processed through the Automated Targeting System-4 Cargo Vessel Risk List. The Vessel Risk List is a dependable, single-window targeting system for all maritime conveyances as well as for identifying AGM risks. The Vessel Risk List will include automatic vessel tracking for vessels having visited AGM prevalent areas during high-risk AGM flight and egg-laying periods.

CBP is leading an initiative to modernize port-to-port communications regarding the results of vessel boarding activity. CBPASs are now utilizing a communication notepad hosted within the Vessel Risk List to record AGM inspectional findings. Findings are then immediately available to subsequent POEs, eliminating duplicative AGM inspections and expediting trade. Importantly, additional notepad functionality in the next generation notepad will automatically populate the CBP's internal data collection system on commercial vessels and further reduce time spent on duplicative data entry activities by CBPASs.

The average amount of time for one CBPAS to inspect a high-risk AGM vessel is 480 minutes, or 8 hours. CBP's ability to quickly target and identify high-risk vessels requiring inspection, as well as those that have previously undergone a thorough examination at a prior port of arrival is key to maximizing AGM interdiction efforts. With the utilization of the Vessel Risk List, CBPASs inspected 847 less conveyances in FY 2014 than in FY 2013. This decrease is directly attributable to the use of Vessel Risk List by CBPASs. In addition to the FTE savings realized, CBPASs interdicted more AGM in calendar year 2014 than at any other time on record.

B. Business Transformation Initiatives through FY 2016

The following are priority BTIs for FY 2015 and FY 2016 with the anticipated opportunity to realign CBPO and CBPAS resources and achieve a cost avoidance in salaries and expenses:

1. **Mobile Passport Control (MPC) – Leverage smartphones to submit traveler data**

Leveraging the success of the APC, and in partnership with Airports Council International – North America, CBP is piloting a new innovative technology called MPC. Airports Council International – North America has developed a mobile application that enables travelers equipped with a smart phone to complete the customs declaration, submit passport information, and upload a photograph prior to inspection. MPC eliminates the need for interaction with the APC kiosk, allowing more face-to-face interaction between the CBPO and the traveler. MPC also reduces primary inspection time. The result is a more efficient process that reduces overall wait times. This initiative was piloted in August 2014 for all international flights at Hartsfield-Jackson Atlanta International Airport. Approximately 1,500 travelers utilized the new technology, which is less than 1 percent of the eligible population. Travelers eligible to use MPC include U.S. citizens with a valid U.S. passport and Canadian citizens with appropriate documentation. CBP is also testing MPC use by Lawful Permanent residents. The percent of travelers utilizing the new technology is expected to increase as the application becomes more widely marketed and additional airports offer the service. CBP has planned site visits for future pilots and expansion in Miami, Chicago, Seattle, and San Francisco in FY 2015.

2. **PRIDE 2.0 – Inspection and detection technology demonstration in Detroit, Michigan**

As introduced in the ROS report in FY 2014, CBP developed a Proof-of-Concept (PoC) for a focused screening/scanning method, which will allow CBPOs to remotely view and evaluate Radiation Detection Equipment scans and Non-Intrusive Inspection images. This concept is referred to as the Port Radiation Inspection, Detection, and Evaluation (PRIDE) 2.0 PoC. PRIDE 2.0 PoC integrates data with Automated Targeting System Cargo, Cargo Enforcement Reporting and Tracking System, Radiation/Nuclear scanning technology, Non-Intrusive Inspection imaging systems, and Optical Character Recognition cameras into the application, which improves communication, streamlines data entry and processing, and provides a holistic examination profile.

PRIDE 2.0 PoC tests were successfully completed at Pier T Cargo Terminal in Los Angeles/Long Beach in September 2013, by integrating and transmitting data between RPM and Non-Intrusive Inspection imaging system. Based on the PoC, the project has progressed to a PRIDE 2.0 Technology Demonstration. The PRIDE 2.0 Technology Demonstration will be conducted in Detroit, Michigan to: (1) test the functionality/ interoperability within the land vector settings, (2) measure against the cost benefit analysis study, and (3) gather additional inputs and lessons-learned to prepare for the national deployment.

The Detroit Technology Demonstration is not anticipated to yield significant savings in CBPOs in FY 2015 (estimated to save approximately 1,100 inspection hours). However, if the technology demonstration yields positive results, CBP expects to expand this initiative to

166 locations through FY 2016. Once this expansion is complete, this initiative is expected to save over 27,000 inspection hours, which will support the realignment of up to 23 CBPOs.

3. Commercial Truck User Fees – Eliminate collection of fees on land border primary

Under the existing process for truck crossings, if a commercial carrier does not purchase an annual user fee decal, the carrier is required to pay a \$10.75 user fee per crossing. The manual collection process of user fees in truck primary inspections at land border POEs is inefficient. The current manual process results in increased wait times and fuel costs for carriers and loss of work hours for CBP. For example, at the Port of Buffalo in FY 2014, a total of 1,808 work hours were spent performing cash collections on primary inspections (each commercial truck inspection took an average of 80 – 90 seconds per vehicle). User fee collections for FY 2014 in the Port of Buffalo was approximately \$800,000. This equates to approximately 72,000 collections (7.5 percent of commercial trucks). Preliminary analysis from an independent contractor indicates a potential 6.5 percent decrease in processing times and 5.5 percent increase in throughput in Buffalo alone.

CBP recently allocated funding to enhance a system to automate the user fee collection process that will enable all commercial carriers, even ones who do not purchase the annual decal, to pay the user fee online prior to arriving at the border, resulting in a more streamlined commercial inspection process. It is anticipated the automated user fee process solution will be piloted in 2015. If this initiative is fully utilized by commercial carriers, a savings of approximately 25,000 inspectional hours would be saved, which is the equivalent of 21 CBPOs through FY 2016.

4. Automate I-94 on Land Border – Potential to save over 750,000 inspection hours

The issuance process of the I-94 Arrival/Departure form is divided into the following steps: manual entry of the application, interview of the applicant, biometric capture (photograph and fingerprint capture), and payment. This project seeks to automate the administrative portion of the application, letting the CBPO conduct a more effective inspection to determine admissibility of the traveler. Automating the application process would serve as a force multiplier and allow CBP managers the flexibility to deploy resources more effectively. It will also increase the CBPOs' ability to carry out the valuable law enforcement purpose behind the I-94 process, namely the interview, which includes the examination of supporting documentation and information contained in various government databases, as well as interaction with the applicant so the officer can detect suspicious mannerisms, telling speech patterns, and cultural clues.

According to the FY 2014 WSM, there were 18,773,082 I-94s processed on the land border in FY 2013. This equates to 1,564,424 inspection hours (calculated at 5 minutes each), which is equivalent to the work of over 1,300 CBPOs. The initiative is expected to save approximately 50 percent (2.5 minutes) of the current processing time; therefore, this initiative has the potential to redirect up to 650 CBPOs on the land border to primary booths or other frontline operations.

5. Developing Biometric Solutions for Entry/Exit Program – Pilot Biometric Exit Solution in 2015

The mission of Entry/Exit Transformation Office is to enhance the integrity of the immigration system by providing assurance of traveler identity on departure matched with arrival. CBP's Entry/Exit Transformation Office plans to carry out this mission by: enhancing the existing biographic entry/exit system by increasing and improving the availability of exit data; identifying and implementing operational solutions of biometric technologies that can support a biometric entry/exit program in the air and sea environments; and, in partnering with other DHS components, identifying and sanctioning those who violate immigration laws, including overstaying in the United States.

CBP has partnered with the DHS Science and Technology Directorate through the Air Entry/Exit Re-engineering Program to identify and assess the optimal technology and process in collecting the traveler's biometric data. Under the Air Entry/Exit Re-engineering Program, different biometric technologies and processes are evaluated based on a comprehensive assessment of the gaps and capabilities of current air entry/exit processes. DHS Science and Technology Directorate is currently testing technology and processes and expects to finish in June 2015. These results will inform a field test of biometric exit technology and processes in the second half of calendar year 2015.

CBP is not relying solely on the partnership with DHS Science and Technology Directorate to advance biometric exit. In February 2014, CBP issued a Request for Information to bring innovation and best practices from private industry into government planning and procurement in conjunction with seeking affordable biographic and biometric exit solutions. CBP is planning to test biometric screening of non-U.S. citizen pedestrians departing the United States through a Southwestern land POE. CBP will test this mobile exit screening capability sometime in FY 2015.

6. Automating Wait Times – Better data; increased transparency

CBP has sought a data service that can provide automated vehicle wait times without having to deploy, operate, or maintain any hardware technology. Working with the private-sector, CBP is currently developing a pilot for an automated wait time measurement solution that combines Global Positioning System-sourced data with vehicle throughput volumes to estimate vehicle wait times. CBP anticipates deploying the pilot to as many as five crossings in the spring of 2015. The pilot will target privately owned vehicles only and, if successful, CBP would expand the pilot to include commercial vehicles. After analysis confirms the accuracy and reliability of the wait time data, CBP will share the results with our stakeholders.

CBP has also invested in an ongoing effort by the Federal Highway Administration, the Texas Department of Transportation, and the University of Texas A&M to develop an automated wait time solution using a RFID solution to estimate commercial vehicle wait times. This pilot solution is targeted for deployment in early 2015. CBP is also developing border wait time applications for smartphones using the iOS (Apple brand's operating system) and Android operating system in order to provide the traveling public with accurate and reliable wait times in real time. These applications complement CBP's current mobile border wait time website, and delivery is anticipated for December 2015.

Additionally, CBP is focusing efforts in the air environment for wait time improvements. The Automated Wait Time Scheduling Tool is a transformative effort designed to improve staffing allocation. This tool is now available to CBP staff at over 200 airports and 14 preclearance locations. In addition, airport wait time data for the top 42 airports is reported daily on a publicly accessible web site. CBP will implement “Live” wait time reporting with streaming data to be available to industry and the public in FY 2015.

7. Expand Preclearance – Implementation of preclearance strategy to achieve the processing of 33 percent inbound traffic by 2024

Preclearance locations are also in the forefront of CBP’s business optimization efforts. DHS and CBP assert that the calculated expansion of preclearance operations in strategic locations will further strengthen our ability to identify terrorists, criminals, and other national security threats prior to encountering them on U.S. soil. Targeting specific locations for the expansion of preclearance will effectively confront evolving aviation security threats while enhancing passenger facilitation. These decisive steps serve to further national security objectives, foster foreign relations, and enrich global economic benefits from overall increased efficiency.

On September 22, 2014, CBP announced a process to evaluate and prioritize potential new preclearance locations for the current fiscal year. The FY 2015 Preclearance Expansion Guidance document outlines the minimum requirements to assess the feasibility of establishing preclearance at a new location. Based on the requirements, CBP is targeting future expansion efforts to key locations in Asia, Europe, and the Middle East. From December 2014 through February 2015, DHS technical teams will be conducting site visits and evaluations of applicant airports to prioritize what locations are more readily suited for operations.

Building upon the success of existing preclearance operations and the strategic path of expansion, CBP has a goal of pre-clearing 33 percent of all U.S.-bound air travelers by 2024. This goal is based on current expectations of foreign airports’ interest in and suitability for preclearance expansion, and expectations of CBP management capability to stand up several new preclearance locations annually over the next decade. Forecasting of FY 2016, CBP Preclearance Operations expect to experience continual growth in clearing passenger volumes in line with industry annual growth of 3-4 percent.

8. Agriculture Pest Exclusion Coordinator (APEC) – CBP pest exclusion initiative to expedite trade and mitigate risk.

The APEC is a collateral duty, performed by a well-trained and qualified CPBAS that encourages the utilization of the Cargo Release Authorities (CRA) initiative. The APEC CBPAS individually and actively seeks CRA authority as part of his/her responsibilities. The APEC’s collateral duty facilitates trade by ensuring cargo is not delayed pending identification of CRA eligible pests. By assuming the APEC responsibility of identifying and processing pest interceptions, additional inspection time is freed up for other CBPASs. When CRA organisms are encountered during cargo inspections, the cargo is held pending pest identification by USDA APHIS PPQ Area Identifiers, and is immediately released by identifications performed by the CBPAS APEC.

In FY 2013, prior to the creation of the APEC pilot collateral duty, CBPASs using CRA authority released only 325 shipments. In FY 2014, CBPAS APECs released 2,908 agriculture shipments – a 9-fold increase from FY 2013, which equates to over 500 staff hours saved at one port location (Pharr, Texas). In addition, in the first pilot delivery of the APEC initiative at the Port of Pharr, average cargo hold times were reduced from 4 hours per held container to 30 minutes per held container. CBP plans to expand the APEC pilot program to three additional POEs in FY 2015.

Table 3 below describes the number of inspectional hours CBP estimates will be avoided in FY 2015 and FY 2016 through the implementation of the listed BTIs. The total number of inspectional hours are then divided by the number of hours a CBPO is available for frontline operations (currently 1,182). The total reported savings are incremental savings from the previous fiscal year if the initiative was implemented in a prior fiscal year. The reported CBPO cost savings is the cost avoidance of CBPO salaries and expenses.

Table 3				
Business Transformation Initiatives Savings Through FY 2016				
CBPO BTIs	FY 2015 Inspectional Hours Saved	FY 2015 Equivalent CBPOs Saved	FY 2016 Inspectional Hours Saved	FY 2016 Equivalent CBPOs Saved
Automated Passport Control	23,640	20	23,640	20
Refined Risk Segmentation				
• NTC/ Tech Enhancements	23,640	20	22,458	19
• ESTA	17,730	15	11,820	10
Automate General Declaration	11,820	10	5,910	5
Form I-94 Automation	5,910	5	5,910	5
CBP Mobile	47,280	40	23,640	20
Expand Operational Best Practices				
• Ready Lanes	23,640	20	29,550	25
• Pedestrian Ready Lanes	7,092	6	4,728	4
Trusted Traveler Program				
○ Nexus	3,546	3	4,728	4
○ SENTRI	16,548	14	18,912	16
○ Global Entry	5,910	5	7,092	6
Transform New Immigrant Process	29,550	25	59,100	50
RPM Optimization	70,920	60	5,910	5
PRIDE 2.0	1,182	1	27,186	23
Commercial Truck User Fee	11,820	10	13,002	11
Automate I-94 on Land Border	0	0	198,576	168
TOTAL	299,046	253	462,162	391

IV. CBP Staffing Requirements for FY 2016

A. Update on the WSM

CBP's WSM, introduced in the *FY 2012 Resource Optimization Strategy at Ports of Entry*, serves as one of the analytical frameworks and is a core element of CBP's ROS to ensure informed staffing needs at the POEs are identified through a thorough and validated data analysis process. Staffing models are a corporate and government standard for determining resource needs. The WSM and AgRAM are analytical tools that provide information on optimal staffing levels – based on specific input criteria – to carry out operations and adequately staff priority areas. The models consider all business processes required of CBPOs and CBPASs, the workload associated with those business processes, and the true level of effort required to effectively carry out the daily mission. The models not only identify the required personnel necessary to accomplish the critical daily mission, but they also capture future staffing requirements for new or enhanced facilities and technology deployments.

The updated WSM results are based on the most recent year's workload data to determine the current staffing requirements, to include the new and renovated POEs that have been brought online as well as the increase in cross-border commercial and passenger traffic through the end of FY 2014. The CBPO staffing requirements also consider new terminals and new inspection lanes or booths and RPM deployments planned through FY 2016. Finally, a conservative annual growth factor of 3 percent was uniformly applied to accommodate anticipated growth in both FY 2015 and FY 2016. Additional details regarding the WSM inputs and calculations can be found in Appendix B.

B. Introduction of the AgRAM

As CBP continues to enhance staffing modeling capabilities, this report introduces CBP's staffing model for CBPASs called the AgRAM. CBPASs are trained to serve as experts in agriculture, border intelligence, analysis, examination, and enforcement activities. Each year millions of pounds of fresh fruits, vegetables, cut flowers, herbs, and other agriculture items enter the United States via commercial shipments from around the world. CBPASs at U.S. POEs target, detect, intercept, and prevent the entry of these potential threats before they have a chance to do any harm. The average CBPAS inspects more than 500 conveyances, 200 shipments of regulated cargo, and 10,000 passengers per year entering the United States. Annually, CBPASs intercept thousands of actionable pests, meaning those pests identified through scientific risk assessment and study as being dangerous to the health and safety of U.S. agricultural resources.

Like the WSM, the AgRAM is an analytical tool developed by CBP to calculate the required number of CBPASs based on the volume and composition of arrivals. The model takes into account both the legally mandated inspection of regulated cargo as defined by USDA APHIS and the risk-based inspection of passengers and cargo. The model takes into account the volume of cargo, conveyance, and passenger arrivals in all environments as reported by Operations Management Report data. The AgRAM also utilizes USDA APHIS data to determine the various work counts in all environments and incorporates pest risk levels as determined by the

USDA. The inclusion of pest risk data provided by the USDA ensures sufficient staffing is allocated for inspection of high-, medium-, and low-risk commodities, passengers, and conveyances. The travel time required of CBPASs is included in the model on a port-level basis, as the travel time in some geographic areas can be significant. The travel time required to conduct physical inspection and compliance inspection at alternate locations has also been taken into account and incorporated into the model. Continued and ongoing training of CBPASs is very important; therefore, training requirements have been considered and included. The AgRAM accounts for NARP, as well as the Northern Agriculture Inspection Program-Canadian Origin, both of which monitor the entry of very low-risk, high-volume agriculture commodities into the United States.

C. Workload Elements Considered by AgRAM

The AgRAM draws upon various data sources to calculate the estimated staffing requirement. Table 4 explains the elements that form the basis for the AgRAM’s calculations.

Table 4	
AgRAM Elements	
Element	Description
Volume	The annualized counts of the mutually exclusive and collectively exhaustive CBPAS activities at each location where these activities are performed. The AgRAM is currently populated with a full set of FY 2013 data for more than 80 CBPAS activities. These activities together represent the processes CBPASs carry out in all CBP OFO operational environments including air, land, and sea environments as well as mail facilities and foreign trade zones; travel time to and from inspectional sites; agriculture mission and compliance enforcement; and secondary and enforcement actions.
Agriculture Risk	USDA APHIS defines the animal and plant health risk ratings (high, medium, low) by country of origin of each cargo commodity of agricultural interest that makes entry into the United States. USDA APHIS also defines the risk level of passengers based on the origination point of a flight.
Processing Times	Each activity has an associated processing time, representing the level of effort (in minutes or hours) a CBPAS expends each time he or she carries out the activity.
Port-Specific Programs and Trade Initiatives	Activities that are highly specialized by port and season are added to the model, along with special trade initiatives.
Available Hours	The number of annual work hours for an FTE CBPAS, net of time away for holidays, vacation, sick leave, training, administrative, and mission support responsibilities.
Resource Utilization	Factor that accounts for peaks and valleys in arrival volume, based on a simulation study. As the utilization factor for a CBPAS increases, that resource is busy for a greater percentage of the available time.

Table 4	
AgRAM Elements	
Element	Description
Percentage Increases	Factors that account for anticipated increases in cargo and passenger volume.

D. AgRAM Calculations

The AgRAM uses the input elements in Table 4 to calculate the staffing requirements at each POE. The main calculation is as follows – the volume, processing times, available hours, and resource utilization factor model elements are used to calculate the workload FTEs. For each activity at each location, the volume multiplied by the processing time equals the annualized work hours. These work hours are divided by the product of the available hours and utilization factor. This quotient equals the number of CBPAS FTEs. The FTEs for all activities at each location are tallied to arrive at a total FTE requirement for each location.

The AgRAM is a performance-driven model in that its results are based on achieving performance-related goals, such as completing legally mandated inspections of regulated commodities. It can also be used to perform sensitivity analyses that help project performance results. The AgRAM assumes that, during peak periods, the POEs employ all CBPASs at nearly 100 percent mission-oriented work, making up for leave, training, and administrative hours during slower periods. To the extent that it is possible, the POEs schedule CBPASs who typically serve in administrative and mission support functions, such as training CBPOs, to perform secondary inspection activities during peak times of the day and year.

E. AgRAM Validation

The AgRAM is not as mature as the WSM and has not undergone the same third-party validation regime. However, in October 2014, CBP engaged an independent third party, Deloitte Consulting LLP, on a four-month current state assessment of the AgRAM. The model assessment focuses on its overall structure, data sources, and incorporation of probability and risk. The AgRAM’s external source evaluation/assessment to validate and assess the calculations and methodology contained within the model was completed in February 2015. The independent assessment’s preliminary findings indicate that the AgRAM’s methodology and approach to identifying staffing needs is thorough and efficient and suggested minor adjustments to make the AgRAM easier to operate and maintain. Preliminary recommendations center on restructuring the model for ease of use, improving model documentation, enhancing the model’s risk analysis, and taking steps to integrate the model with existing OFO WSMs.

F. CBP’s FY 2016 Integrated Staffing Model Results

CBP continues to make significant progress towards achieving our strategic enterprise goal for the WSM to integrate the AgRAM and all CBP Resource Models in order to ensure best practices and minimum standards are applied. The AgRAM continues to be assessed and refined. Although integrating all CBP resources models is an ongoing endeavor, CBP can present initial integrated staffing requirements from the WSM and AgRAM. The figures in

Table 5 through 7 on the following pages represent the FY 2016 national staffing requirement based on the WSM and AgRAM calculations.

It is important to note, field managers work within the constraints of current personnel levels to align staffing to the daily workload, which can be exacerbated during peak travel times when additional staff is simply not available. Leave usage, administrative functions, and training of CBPOs and CBPASs is appropriately limited during the peak processing times, ensuring that CBPOs and CBPASs are available to staff primary and secondary inspections. To address those situations where critical operational needs exceed staffing availability, CBP allocates all available resources including, in some cases, surge overtime to supplement permanent staff. The precise application of core overtime is the day-to-day mechanism that CBP uses to address a significant portion of the staffing deficit reflected in the WSM and AgRAM results on the following page.

Table 5	
Baseline Staffing Model Results	
Baseline WSM Result	27,047
Total Current CBPO Staffing Resources	26,127
<ul style="list-style-type: none"> • OFO FY 2014 Funded CBPO Staffing (23,662)* • Projected OFO Core Overtime Expenditures in FY 2015 (2,465)** 	
Total Current CBPO Staffing Need	920
Baseline AgRAM Result***	3,140
<ul style="list-style-type: none"> • OFO FY 2014 Funded CBPAS Staffing 	2,417
Total Current CBPAS Staffing Need	723

* In addition to CBPOs funded within OFO's budget plan, an additional 201 CBPOs are funded through other CBP organizations, such as the Office of Training and Development. The two populations together reflect a total current CBPO staffing level of 23,863.

** CBPO FTE equivalent based on \$220.0 million projected core overtime expenditures.

*** Figure is projected, assuming an increase of 3 percent from FY 2014 model results.

As mentioned above, OFO's staffing requirement approach identifies the WSM baseline results, requirements for facility enhancements, and technology deployments and requirements for conservatively projected growth through FY 2016 (3 percent). These additional factors are not added to the AgRAM baseline staffing requirements since infrastructure and technology does not directly impact CBPAS staffing requirements and the AgRAM baseline results incorporate volume growth. Finally, CBP subtracts the expected savings of the BTIs from the CBPO and CBPAS requirements to arrive at a total net requirement. Table 6 captures these total net requirements for CBPO staffing through FY 2015 while Table 7 captures the total net requirements for CBPO and CBPAS staffing through FY 2016.

Table 6	
FY 2015 Requirement for Additional Staffing (CBPOs only)	
Echelon CBPOs	Requirement
Current baseline gap (from above)	920
Facility/Technology Requirements FY 2015	354
Volume Growth FY 2015 (3 percent)	780
BTI savings through FY 2015	(253)
Total	1,801

Table 7	
FY 2016 Requirement for Additional Staffing	
Echelon CBPOs	Requirement
FY 2015 gap (from above)	1,801
Facility/Technology Requirements for FY 2016	410
Volume Growth FY 2016 (3 percent)	804
BTI savings through FY 2016	(391)
Total	2,624
Echelon CBPASs	Requirement
FY 2016 gap	723
Total	723

G. Northern Border Staffing Strategy

The various work activities performed by the CBPOs and CBPASs stationed at the CBP POEs along the Northern Border are captured, processed, and then analyzed by the WSM and AgRAM modeling programs. Their projections are then utilized by CBP management in determining how to allocate staffing resources whilst maximizing cost efficiencies in conjunction with ensuring resources are aligned within the existing threat environments.

V. Comprehensive Funding Strategy – Alternative Sources of Funding

The third prong of CBP’s ROS is a comprehensive funding strategy that leverages legislative proposals and public-private partnerships to supplement funds appropriated by Congress. CBP has updated this strategy, as supported in the President’s FY 2016 Budget, to provide alternatives to add workforce capability to address CBP’s Staffing Model findings through FY 2016.

The near-term alternative sources of funding strategies include seeking Congressional support for legislative proposals to increase current immigration and customs user fees in order to recover more of the costs associated with providing services. The economic data and recent studies demonstrate a clear return on investment from adding staffing resources to POEs. The legislative proposals summarized below would increase CBP staffing resources and, should they be enacted into law, would serve to facilitate and secure the international trade and travel that is the lifeblood of our economy. The long-term strategy also seeks to expand upon our most recent public-private partnership authority, which was included by Congress in the *Consolidated Appropriations Act, 2014* (P.L. 113-76), to fund enhanced CBP services and implement new funding streams for current programs.

A. Near-Term Funding Strategy

1. Increase Primary User Fees

User fees are paid by the trade community and traveling public for CBP inspectional services such as the costs of inspecting passengers, conveyances, and goods for air, land, and sea environments. User fee revenue can only be used to reimburse certain eligible costs. These costs primarily include the costs of performing CBP inspections to support those inspections or, in the case of the *Consolidated Omnibus Budget Reconciliation Act of 1985* (COBRA), inspectional overtime, salaries, benefits, preclearance, and other support costs. As these fees are set by statute and have not been adjusted in several years, they do not fully recover the costs associated with customs and immigration inspections, and each year the “buying power” of these fees diminish. Therefore, without regular fee adjustments, full cost recovery of costs through fees is not attainable due to staffing costs growth each year and CBP must rely upon annual appropriation to fund the portion of the expenses not supported by user fees.

Along with the FY 2016 President’s Budget Request, CBP is proposing legislation for the authorizing committees to raise the IUF and COBRA fees to decrease the shortfall between the costs of CBP’s customs and immigration inspection activities and the collections received. If enacted, this will allow CBP to hire approximately 2,300 additional CBPOs, which will result in improved customs and immigration inspection services provided to those who pay this fee when traveling to the United States.

Air	Land	Sea	Total	Air	Land	Sea	Total
FY 2015 Collections**				FY 2015 Costs**			
\$1,858,877	\$1,071,289	\$1,374,908	\$4,305,074	\$1,938,719	\$1,030,401	\$1,016,543	\$3,985,663
43%	25%	32%	100%	49%	26%	26%	100%
FY 2014 Collections				FY 2014 Costs***			
\$1,713,345	\$1,039,803	\$1,343,005	\$4,096,153	\$1,907,333	\$1,020,199	\$1,006,478	\$3,934,010
42%	25%	33%	100%	48%	26%	26%	100%
FY 2013 Collections				FY 2013 Costs			
\$1,550,389	\$ 967,598	\$1,215,855	\$3,733,842	\$1,822,268	\$1,114,069	\$1,062,731	\$3,999,068
42%	26%	33%	100%	46%	28%	27%	100%
FY 2012 Collections				FY 2012 Costs			
\$1,497,109	\$ 929,705	\$1,166,809	\$3,593,622	\$1,755,154	\$1,051,950	\$ 994,745	\$3,801,849
42%	26%	32%	100%	46%	28%	26%	100%

* Collections exceed costs due to the separate inclusion of the Merchandise Processing Fee, which, by statute, is governed by a different regime concerning the use of those collections.

** FY 2015 Figures tied to projections made in CBP FY 2014 Biennial Report.

*** FY 2014 Costs tied to CBP FY 2014 Biennial Report. This will be updated once final cost data is available.

2. Other COBRA and Express Consignment Carrier Facilities fees

The strategy includes a proposal to increase the fees statutorily set under COBRA and the Express Consignment Courier Facilities. COBRA created a series of user fees for air and sea passengers, commercial trucks, railroad cars, private aircraft and vessels, commercial vessels, dutiable mail packages, broker permits, barges and bulk carriers from Canada and Mexico, cruise vessel passengers, and ferry vessel passengers. This proposal would increase the customs inspection fees by \$2 and increase other COBRA fees by a proportional amount. The Express Consignment Carrier Facilities fee was created to reimburse CBP for inspection costs related to express consignment. The proposal would increase the fee by \$0.36. The additional revenue raised from these fee increases will allow CBP to recover more costs associated with customs-related inspections and reduce waiting times by supporting the hiring of 900 new CBPOs. The legislation will also include authority to increase fees annually, as needed, to adjust them for inflation.

3. IUF increase and lifting of IUF fee limitation

The FY 2016 President's Budget Request also proposes to increase the immigration inspection user fee by \$2. The current fees are \$7 for air and commercial vessel passengers and \$3 for partially exempted commercial vessel passengers whose trips originate in Canada, Mexico, the U.S. territories, and any adjacent island. This fee is paid by passengers and is used to recover some of the costs related to determining the admissibility of passengers entering the United States. Specifically, the fees collected support the cost of immigration inspections (including personnel, performing such inspections) the maintenance and updating of systems that track criminal and illegal aliens in areas with high apprehensions, asylum proceedings, and the repair and maintenance of equipment, among other purposes.

The FY 2016 President’s Budget Request also includes a proposal to lift the exemption for sea passengers traveling from the United States, Canada, Mexico, and adjacent islands so that the same fee will be applied to all sea passengers. As noted, each sea passenger arriving in the United States is currently charged a \$7 fee if his or her journey originated from a place outside of the United States, when the journey originated for these locations. Lifting this fee limitation will bring collections more in line with the cost of conducting sea passenger inspections, as well as help modernize and create more efficient and effective business processes and systems in the cruise environment. Together, the additional receipts collected from these increases would fund 1,400 new CBPOs, which will reduce wait times at air and sea POEs, especially as cruise volumes continue to grow as projected in future years.

Table 9			
User Fee Funding Level Increase			
	FY 2016 Funding Level Increase	FY 2017 Funding Level Increase	Number of CBPOs
COBRA			
COBRA Fees	\$130,069	\$180,363	850
Express Consignment Carrier Facilities	\$ 8,169	\$ 11,328	50
Total	\$138,239	\$191,691	900
IUF			
Commercial Air/Sea Passengers	\$161,838	\$224,416	1060
Sea Passengers (Partially Exempted)	\$ 51,998	\$ 71,410	340
Total	\$213,836	\$295,826	1400

*Assumes FY 2016 is the first year of collections from the increases to COBRA and IUF from the beginning of the second quarter. Assumes the first full year of collections is FY 2017. However, date of enactment of fee increases as well as hiring capacity may impact CBP’s ability to complete hiring by the end of FY 2017.

4. Agricultural Quarantine Inspection Program User Fees

Protecting the agricultural health of our Nation is the responsibility of both APHIS and CBP. This joint responsibility is performed seamlessly, with APHIS responsible for promulgation of rules and responsibilities and CBP responsible for policy implementation and for conducting examinations for AQI operations. CBPASs strategically deployed at POEs are the experts and technical consultants in the areas of inspection, intelligence, analysis, examination, and law enforcement activities related to importation of agricultural/commercial commodities and conveyances at the various POEs.

APHIS fee rates are set by the USDA, and CBP’s share of these fees is determined by periodic agreement with USDA. The intent of the revenues from these fees is to achieve full cost recovery for the AQI function. CBP typically receives 60 to 63 percent of the total collections. In FY 2014, the revenues from the current fee level covered 77 percent of CBP’s costs that were incurred in providing the inspectional activities associated with the passengers and conveyances that are subjected to fees.

APHIS worked with an independent accounting firm to review the AQI fee structure and carefully considered a number of alternatives for revising the user fees structures. Much of the

additional revenue from fees will cover the costs of ongoing CBP inspection activities that are now supported through funds appropriated from the General Treasury. This user fee rate is currently under review, and an update will allow us to recover the costs from those that benefit from the services associated with importing goods into the country, while minimizing impacts to U.S. employment and the economy.

The promulgation of this final rule would represent the first major adjustment to AQI fees in nearly 10 years. Other than minor adjustments for inflation from FY 2000 – FY 2010, the fee rates have not changed even though the AQI program has hired several hundred additional inspectors and incurred other costs to meet the increasing need caused by a large increase in arriving international passenger and cargo traffic.

In its rulemaking, USDA has proposed the following fee rate changes:

Fee Category	Current Fee	Proposed Fee	Change
Commercial Aircraft	\$70.75	\$225	\$154.25 increase
Commercial Cargo Ships	\$496	\$825	\$329 increase
Commercial Trucks	\$5.25	\$8	\$2.75 increase
Commercial Truck Transponders	\$105 per year	\$320 per year	\$215 increase
International Air Passengers	\$5	\$4	\$1 decrease
Commercial Cargo Railcars	\$7.65	\$2	\$5.65 decrease
International Sea (Cruise) Passengers	\$0	\$2 per passenger	New fee
Treatments	\$0	\$375 per treatment	New fee

B. Long-Term Funding Strategy

1. General provisions 559 and 560 language

Section 560 of the *Consolidated and Further Continuing Appropriations Act, 2013* (P.L. 113-6) authorized the Commissioner of CBP to enter into five reimbursable fee agreements for certain CBP services by December 31, 2013. The entities selected for these partnerships are Dallas/Fort Worth International Airport; the City of El Paso, Texas; South Texas Assets Consortium; City of Houston Airport System; and Miami-Dade County; agreements with all five stakeholders were completed before December 31, 2013. CBP implemented a “soft” launch at Dallas/Fort Worth International Airport on December 21, 2013, and full implementation at all locations began on January 26, 2014.

Program impacts have been positive overall. Through December 13, 2014, CBP was able to provide an additional 18,000 CBPO assignments, has opened primary lanes and booths for an additional 52,000 hours at the request of Section 560 partners, and has been reimbursed over \$6.1 million in the costs associated with the provision of those CBP services. Feedback from CBP’s partners has also been largely positive, as evidenced in the testimony provided by the Mayor of the City of El Paso, Texas, on July 16, 2014 during the hearing before the House Homeland Security Committee, Subcommittee on Border and Maritime Security on U.S. port infrastructure and public-private partnerships.

The reimbursable fee agreements authorized under Section 560 allow CBP to staff workload increases and accommodate requests for additional services necessary to effectively secure the Nation’s borders, enforce federal immigration and drug laws, and facilitate legitimate trade and travel. Additionally, CBP understands the importance of transparency in this program and is monitoring its implementation against performance measures, such as comparing the baseline processing rates at participating POEs from previous years to those time periods when reimbursable services were provided.

In FY 2014, Congress expanded public-private partnership authorities for CBP in Section 559 of the *Consolidated Appropriations Act of 2014*, allowing CBP to enter into additional Reimbursable Services Agreements. Although there are no limitations on the number of agreements for the land and sea environments, this authority limits CBP to five per year (for each of the five years for which the statute authorizes the pilot program) in the air environment. While Congress continued to limit reimbursement to CBP’s payment of overtime in the air environment, the new authority expanded applicable “services” to include agricultural processing and border security services.

CBP received 25 Reimbursable Services Agreement applications in 2014, of which 16 were selected for new partnerships. These include (by environment):

Air

- Los Angeles World Airports;
- San Francisco International Airport;
- Greater Orlando Aviation Authority;
- McCarran International Airport – Las Vegas; and

- Denver International Airport.

Sea

- Penn Terminals, Inc.;
- Independent Container Line, Ltd.;
- Network Shipping Ltd.;
- Greenwich Terminals LLC;
- Gloucester Terminals LLC;
- Turbana Corporation;
- Interoceanica Agency, Inc.;
- Diamond State Port Corporation (Port of Wilmington, Delaware);
- Port of Houston Authority; and
- Broward County (Port Everglades).

Land

- South Texas Assets Consortium⁴.

Separately, CBP is also authorized under Section 559 of the *Consolidated Appropriations Act, 2014* (P.L. 113-76), in collaboration with GSA, to conduct a 5-year pilot program to enter into partnerships with private sector and government entities at POEs and to accept certain donations. Since enactment in January 2014, CBP and GSA have worked closely to establish the framework that will be used to implement this aspect of Section 559, referred to as the Donation Acceptance Authority.

Pursuant to this authority, CBP and GSA are authorized to accept donations of real property, personal property (including monetary donations), and non-personal services from private sector and government entities. Accepted donations may be used for activities related to the construction, alteration, operations, and maintenance at CBP- or GSA-owned POEs. These activities may include, but are not limited to land acquisition, design, and the deployment of equipment and technologies. Partnerships entered into during the pilot program may extend beyond the initial 5-year timeframe.

CBP worked closely with GSA to develop a comprehensive framework for receiving, reviewing, evaluating and scoring, and making final selections of donations proposals submitted by interested parties. The *Section 559 Donation Acceptance Authority Proposal Evaluation Procedures and Criteria Framework* was published on October 1, 2014.

2. FY 2016 Funding Strategy

Tables 11 and 12 below summarize the components of the funding strategy through FY 2016 and shows the offset of CBP's staffing needs by the proposed funding sources. First, Table 11 summarizes the staffing requirements for CBPOs and CBPASs. This table is mostly a reprise of the staffing model results addressed earlier in this report. The only difference is that the staffing requirement for CBPOs below includes 49 CBPOs for program enhancements requested in the

⁴ This new agreement supplants the Section 560 agreement with this same stakeholder.

President's FY 2016 budget that are not accounted for in the WSM baseline or other requirements.

Table 11	
FY 2016 Staffing Requirements	
CBP Officers	
Requirement Component	CBPOs
WSM Baseline Requirement	27,047
FY 2015 Facility and Technology	354
FY 2015 Volume Growth	780
FY 2015 BTI Savings	(253)
FY 2015 Total	27,928
FY 2016 Facility and Technology	410
FY 2016 Volume Growth	804
FY 2016 BTI Savings	(391)
FY 2016 President's Budget Program Enhancements	49
FY 2016 Total CBPO Requirement	28,800
CBP Agriculture Specialists	
Requirement Component	CBPASs
AgRAM Baseline Requirement	3,140
FY 2016 Total CBPAS Requirement	3,140

Table 12 below shows CBP's strategy for funding the staffing requirements for CBPOs and CBPASs through FY 2016. Note that the strategy – if implemented – would totally fund the requirement for CBPOs, but would still leave gap in funding the CBPAS requirement.

Table 12	
FY 2016 Proposed Funding	
CBP Officers	
Funding Component	CBPOs
Appropriations, CBPO Staff	16,241
User Fees, CBPO Staff	7,421
User Fees, Core Overtime	2,465
COBRA User Fee Increase	900
IUF Increase – Air	1,060
IUF Increase – Cruise	340
Mission Support and Operational Specialists	277
President's Budget Program Enhancements	96
FY 2016 Total Funding	28,800
CBP Agriculture Specialists	

Table 12	
FY 2016 Proposed Funding	
CBP Officers	
Funding Component	CBPOs
Funding Component	CBPAS
Appropriations and AQI Program User Fees, CBPAS Staff	2,417
AQI Program User Fees, Projected Increase	126
Mission Support and Operational Specialists	15
FY 2016 Total Funding	2,558
Remaining Gap	582

*While a significant portion of OFO's overtime budget for CBPO's is funded from User Fees, the use of appropriated funds is permissible.

3. Increase Mission Support Personnel to Realign Frontline Resources

Without acquiring the necessary support resources, frontline personnel at the POEs will continue to perform a large portion of administrative and operational support workload. OFO is currently expending significant CBPO and CBPAS resources on administrative and operational support functions. The main contributor to the high volume of support workload performed by frontline personnel is a position mix imbalance that has evolved since CBP's creation in 2003. This is due, in large part, to the focus on hiring frontline CBPOs without hiring the requisite number of support to accomplish the ever-growing support mission. Through a combination of automation, process improvement, and most importantly, a change in skill mix that includes more full-time administrative and support personnel, OFO will be able to close the gap between the baseline staffing needs identified by the WSM and the FY 2015 staffing requirement after application of facility/technology requirements, volume growth, and BTI savings' factors through the filling of mission and operational support positions.

VI. Conclusion

CBP is committed to ensuring the security of our Nation's borders, while continuing to facilitate legitimate travel and trade. There has been significant progress in our partnership with Congress, local governments, business groups, and the trade and travel industry to ensure the Nation's POEs are sufficiently staffed.

These accomplishments were considered in developing the FY 2016 staffing requirements and funding strategy, as we recognize there is still a need to increase workforce capabilities. CBP will continue to implement our multi-pronged approach to address frontline personnel needs by: (1) maximizing the use of current resources through overtime and optimal scheduling practices; (2) pursuing alternative sources of financing through legislative proposals supporting reimbursement authority and, as appropriate, adjusting user fees; and (3) continuing to implement BTIs to reduce costs and mitigate staffing requirements.

Taken together, this multi-pronged strategy will allow CBP to increase workforce capability while enhancing operations. Innovative transformation efforts and public-private partnerships also will help inform the long-term frontline personnel requirements as the WSM and AgRAM are adjusted and improved annually. CBP looks forward to working with Congress on the identified initiatives, as well as long-term efforts to address the findings of the model. CBP welcomes input from legislators, state and local partners, and private-sector stakeholders as it works to refine operations and plans strategically for future personnel requirements.

The FY 2016 President's Budget request fully funds the needs identified in the WSM and partially funds the AgRAM through a combination of increased user fee rates, adjusted fee accounts, additional inspection equipment, and a decreased workload of non-law enforcement activities for CBPOs so as to maximize CBP resources at the POEs.

Appendix A. List of Abbreviations/Acronyms

Acronym	Definition
AGM	Asian Gypsy Moth
AgRAM	Agriculture Resource Allocation Model
AIDMS	Agriculture Integrated Data Management System
APC	Automated Passport Control
APEC	Agriculture Pest Exclusion Coordinator
APHIS	Animal and Plant Health Inspection Service
AQI	Agriculture Quarantine Inspection
BTI	Business Transformation Initiative
CBP	U.S. Customs and Border Protection
CBPAS	U.S. Customs and Border Protection Agriculture Specialist
CBPO	U.S. Customs and Border Protection Officer (GS-1895)
COBRA	<i>Consolidated Omnibus Budget Reconciliation Act of 1985</i>
CRA	Cargo Release Authorities
CREATE	National Center for Risk and Economic Analysis of Terrorism Events
DHS	Department of Homeland Security
DOS	U.S. Department of State
ESTA	Electronic System for Travel Authorization
FTE	Full-Time Equivalent Employee
FY	Fiscal Year
GDP	Gross Domestic Product
GE	Global Entry
Gen Dec	General Declaration
GSA	U.S. General Services Administration
ITDS	International Trade Data System
IUF	Immigration User Fee
JFK	John F. Kennedy International Airport
MPC	Mobile Passport Control
NARP	National Agriculture Release Program
NTC	National Targeting Center
OFO	Office of Field Operations
PoC	Proof-of-Concept
POE	Port of Entry
PRIDE	Port Radiation Inspection, Detection, and Evaluation
PPQ	Plant Protection and Quarantine Program
RFID	Radio Frequency Identification
ROS	Resource Optimization Strategy
RPM	Radiation Portal Monitor
SENTRI	Secure Electronic Network for Traveler's Rapid Inspection
USCIS	U.S. Citizenship and Immigration Services
USDA	U.S. Department of Agriculture

Appendix B. WSM Methodology and Inputs

A. Inputs

Table 13 explains the elements that form the basis for the WSM’s calculations that determine staffing requirements.

Table 13	
WSM Elements	
Element	Description
Volume	The annualized counts of the mutually exclusive and collectively exhaustive CBPO activities at each location where these activities are performed. The WSM is currently populated with a full set of FY 2012 data for well over 100 CBPO activities. These activities together represent the processes CBPOs carry out in all CBP OFO operational environments including air, land, and sea modes; immigration and customs missions; and primary, secondary, and enforcement actions.
Processing Times	Each activity has an associated processing time, representing the level of effort (in minutes or hours) a CBPO expends each time he or she carries out the activity.
Available Hours	The number of annual work hours for an FTE CBPO, net of time away for holidays, vacation, sick leave, training, administrative and mission support responsibilities, and temporary duty assignments.
Percentage Increases	Factors that account for supervisors and special dedicated teams, such as Passenger Analytical Units and Advanced Targeting Units. These are responsibilities that tend to be driven by overall volume, for which there are no countable transactions that drive the workload.
Facility and Technology Coverage	Some CBPO responsibilities exist independent of traffic volume levels. Low-volume POEs require minimum staffing levels to keep the POEs operational. Some equipment or locations within a POE (for instance, exit points) require dedicated staffing regardless of usage rates. Finally, the complexity of a POE, as characterized by multiple crossings or multiple terminals, adds to the staffing burden.
Future Requirements	Program offices provide estimates of future staffing requirements for new or expanded facilities and technology deployments.

B. Calculations

The WSM uses the input elements in Table 4 to calculate the staffing requirements at each individual POE location. The main calculation steps are described in Table 14.

Table 14	
WSM Calculation Steps	
Calculation Step	Description
Workload FTEs	The volume, processing times, and available hours elements are used to calculate the workload FTEs. For each activity at each location, the volume multiplied by the processing time equals the annualized work hours. These work hours divided by the available hours equals the Workload FTEs. The Workload FTEs for all activities at each location are tallied to arrive at a total Workload FTE requirement for each location.
Percentage Increases Application	Each location's Workload FTEs multiplied by the percentage increase factor for each special activity equals the required staffing for those activities (supervisors, special teams, etc.).
Facility and Technology Coverage	The minimum staffing factors multiplied by each location's unique set of facility and technology characteristics equals the additional staffing required for facility and technology coverage.
Future Requirements	The future requirements for each location are added to the previously calculated staffing requirements as part of an integrated staffing requirement matrix.

The first three steps combine to determine the current staffing requirements, considering the new and renovated POEs that have been brought online as well as the increase in cross-border commercial and passenger traffic as of the end of FY 2014. The fourth step identifies the additional CBPOs required for facility enhancements and technology deployments planned through FY 2016.

The WSM is not a performance-driven model in that it does not automatically calculate different results on the basis of achieving performance-related goals, such as meeting wait time service levels and goals. Rather, the model calculates the staffing required to complete all aspects of the core mission work, regardless of fluctuations in workload volume, over the course of a year or within any given day. It can be used to perform sensitivity analyses that help project performance results. The WSM assumes that, during peak periods, the POEs employ all CBPOs at nearly 100-percent mission-oriented work, making up for leave, training, and administrative hours during slower periods. To the extent that it is possible, the POEs schedule CBPOs who typically serve in administrative and mission support functions, such as training officers, to primary or secondary inspection activities in busy times of the day and year. Additionally, CBP includes overtime spent on core processes in our presentation of the WSM results, as described in the following subsection.

C. Application of Overtime

A critical component of CBP's efforts to effectively staff the POEs is the use of overtime funding. CBP derives overtime funding from user fees collected primarily from air carriers. At the POEs, CBP uses overtime to address core operational staffing requirements, as well as surge requirements. Core overtime is used in two primary ways: (1) to address daily peak traffic periods and close potential gaps between shifts; and (2) to complete enforcement actions initiated during daily shifts. Surge overtime, in contrast, is used to provide surge capacity to address heightened enforcement operations, such as the Arizona Alliance for Combating Transnational Threats or the South Texas Campaign; to address unanticipated traffic peaks; and to support threat or incident response operations, including mobile response team deployments, National Security Special Events, and the emergency support functions of Federal Emergency Management Agency-led disaster responses.

These two types of overtime are applied differently by CBP at POEs and are accounted for separately in the WSM. The standard use of core overtime provides the ability to staff in precise increments, rather than in 8–10 hour blocks, and promotes efficiency in the application of CBP's staffing resources at POEs. It is an important technique in optimizing the utilization of resources. Due to ongoing annual user fee collections, the routine nature of the use of overtime for day-to-day functions, and the continuing operational value and efficiency of incorporating an overtime component into the overall staffing requirement, CBP includes core overtime in the WSM by adding it to the current CBPO staffing level. This approach provides a more complete and accurate representation of the CBPO resources available to apply to mission requirements.

The ability to flexibly and rapidly respond to support heightened enforcement and facilitation operations, as well as other incident or threat-based requirements, is a critical component of OFO's operational posture. Accordingly, surge overtime is accounted for outside of the WSM since it is intended to apply to unique and cyclical contingencies that present staffing requirements outside of standard operations.