

**CBP Could Do More
to Plan for Facilities Along
the Southwest Border**





OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

August 29, 2023

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

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

SUBJECT: *CBP Could Do More to Plan for Facilities Along the
Southwest Border*

Digitally signed by
JOSEPH V CUFFARI
Date: 2023.08.28
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Attached for your action is our final report, *CBP Could Do More to Plan for Facilities Along the Southwest Border*. We incorporated the formal comments provided by your office.

The report contains two recommendations aimed at improving how U.S. Customs and Border Protection (CBP) plans for temporary and permanent facilities along the Southwest border. Your office concurred with both recommendations. Based on information provided in your response to the draft report, we consider recommendations 1 and 2 open and resolved. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days so that we may close the recommendations. The memorandum should be accompanied by evidence of completion of agreed-upon corrective actions and of the disposition of any monetary amounts. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

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

Attachment



DHS OIG HIGHLIGHTS

CBP Could Do More to Plan for Facilities Along the Southwest Border

August 29, 2023

Why We Did This Audit

During fiscal year 2022, SWB crossings surged between ports of entry, resulting in more than 2.3 million encounters. The significantly elevated number of encounters strained CBP's resources. We conducted this audit to determine the extent to which CBP assessed and planned its needs for temporary and permanent facilities to process and hold migrants along the SWB.

What We Recommend

We made two recommendations to improve how CBP plans for temporary and permanent facilities along the SWB.

For Further Information:

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

What We Found

Since 2019, U.S. Customs and Border Protection (CBP) has improved its response to migrant surges by deploying temporary facilities to increase its capacity to humanely process migrants along the Southwest border (SWB). However, CBP did not always document its planning decisions for both temporary and permanent facilities. Additionally, CBP did not consider alternatives before issuing contracts for temporary facilities. Finally, CBP did not document whether it continually reassessed the need for existing temporary facilities, including the cost-effectiveness of keeping those facilities.

These conditions occurred because CBP prioritized short-term response over long-term planning and does not have a comprehensive policy that incorporates planning for both temporary and permanent facilities. As a result, CBP may be spending money on facilities that are not cost effective and in the best interest of taxpayers. Additionally, CBP may not be well prepared for future migrant surges or for a higher steady state of migrants in custody.

CBP Response

CBP concurred with both recommendations. We consider these recommendations open and resolved.



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Abbreviations

CBP	U.S. Customs and Border Protection
SWB	Southwest border
U.S.C.	United States Code

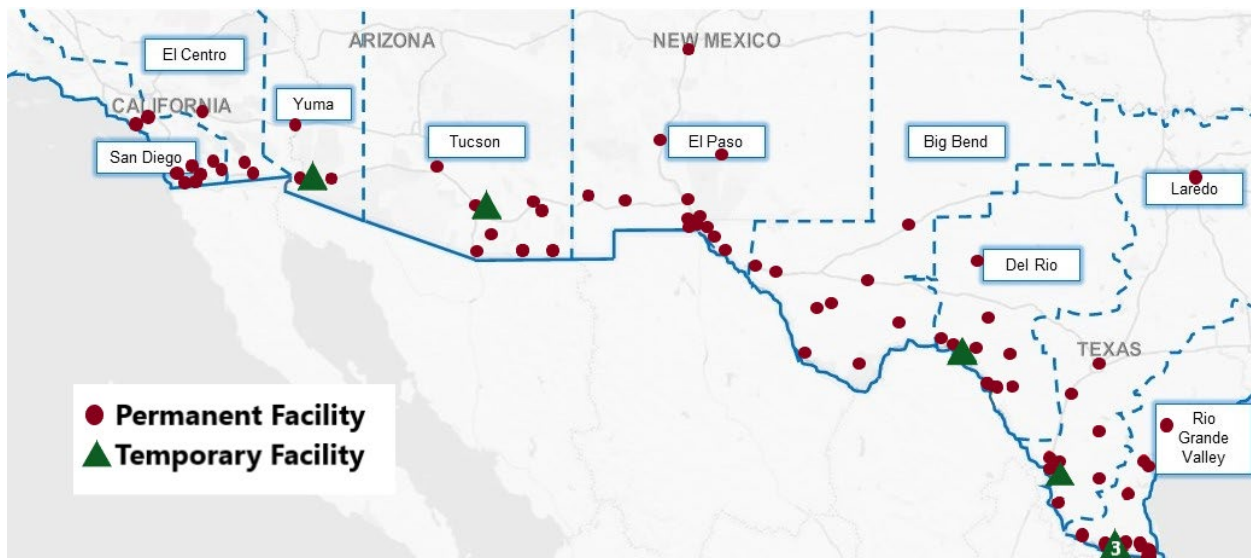


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Background

U.S. Customs and Border Protection (CBP) maintains 74 permanent facilities along the Southwest border (SWB) for short-term detention of people who are inadmissible to the United States or subject to criminal prosecution (see Figure 1). These facilities are only equipped for short-term detention; after CBP processes detainees, it may repatriate them, release them, or transfer them to other agencies. CBP standards require segregation for different demographics, such as adults, juveniles, family units, and at-risk populations, as well as separation based on gender.

Figure 1. Map of Permanent and Temporary Facilities Along the SWB



Source: Department of Homeland Security Office of Inspector General depiction based on information from CBP. Facility sites will not add up to total due to overlapping on map.

In fiscal year 2019, CBP faced a spike in encounters, an increasing proportion of which involved family units. To address the increased number of migrants and all demographics, CBP awarded contracts for temporary soft-sided facilities to supplement its existing facilities, some of which were over capacity. These temporary facilities are tent-like structures and include equipment necessary to make them livable, such as heating, ventilation, air conditioning, plumbing, electrical, and lighting systems (see Figure 2). From FY 2019 through FY 2022, CBP funded contract task orders totaling more than \$1.27 billion for temporary facilities, which also included support services such as meals, medical care, childcare, and janitorial services. As of June 20, 2022, within CBP’s nine sectors along the SWB, U.S. Border Patrol had seven temporary soft-sided



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facilities: three in the Rio Grande Valley sector, and one in each of the Laredo, Del Rio, Tucson, and Yuma sectors.

Figure 2. Soft-Sided Facility at Laredo, Texas



Source: CBP website as of February 3, 2023

Since 2019, the volume of migrants crossing the SWB has fluctuated. Starting in March 2020, the number of migrants entering the United States decreased significantly after the Centers for Disease Control and Prevention issued a public health order under Title 42¹ of the United States Code (U.S.C.). The order, which was issued in response to the COVID-19 public health emergency, prohibited entry into the United States by certain persons from foreign countries traveling from Canada or Mexico, regardless of their countries of origin. The order was issued to prevent the spread of COVID-19 into land ports of entry and Border Patrol facilities at the borders with Canada and Mexico, or into the interior of the country. During FY 2020, CBP encountered 458,088 migrants,² a 53 percent reduction from the number of encounters in FY 2019. However, in FYs 2021 and 2022, SWB crossings between ports of entry increased to more than 1.7 and 2.3 million encounters, respectively. The significantly elevated number of encounters strained CBP's resources.

In February 2022, DHS issued the *DHS Southwest Border Mass Irregular Migration Contingency Plan*, which outlines the actions DHS components and

¹ 42 U.S.C. § 265 - Suspension of entries and imports from designated places to prevent spread of communicable diseases.

² Encounter numbers include individuals processed under Title 8 and expelled under Title 42.



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their Federal partners should take to humanely prevent and respond to migrant surges across the SWB. The immediate goal of DHS' plan is to create an infrastructure to process migrants quickly, safely, and humanely at the SWB and in the interior. According to the plan, DHS' long-term priorities include developing sustainable capacity and capability. DHS' plan was developed based on lessons learned and best practices the Department collected from 2016 through 2022 to meet current and anticipated migration activities and surges.

To implement DHS' contingency plan, CBP developed the *CBP Integrated SWB Mass Irregular Migration Contingency Plan* (draft, dated February 2022) (CBP's plan). As of August 2023, CBP's plan is still in draft.

We conducted this audit to determine the extent to which CBP assessed and planned its needs for temporary and permanent facilities to process and hold migrants along the SWB.

Results of Audit

Since 2019, CBP improved its response to migrant surges by deploying temporary facilities to increase its capacity to humanely process migrants along the SWB. However, CBP did not always document its planning decisions for both temporary and permanent facilities. Additionally, CBP did not consider alternatives before issuing contracts for temporary facilities. Finally, CBP did not document whether it continually reassessed the need for existing temporary facilities, including the cost-effectiveness of keeping those facilities.

These conditions occurred because CBP prioritized short-term response over long-term planning and does not have a comprehensive policy that incorporates planning for both temporary and permanent facilities. As a result, CBP may be spending money on facilities that are not cost effective and in the best interest of taxpayers. Additionally, CBP may not be well prepared for future migrant surges or for a higher steady state of migrants in custody.

CBP Has Made Progress in Facility Planning, But Additional Work Is Needed

CBP has taken steps to improve its temporary facility planning process by drafting the *CBP Integrated SWB Mass Irregular Migration Contingency Plan*. CBP used lessons learned from prior migrant surges to formulate this plan.

When making informed facility planning decisions, CBP's *Cost-Wise Readiness Guidebook* requires the component to continually evaluate operations to ensure they are as efficient and cost effective as possible. According to the guidebook,



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CBP defines cost-wise readiness as a strategic framework for establishing and maintaining material readiness at the best cost. Additionally, according to the U.S. Government Accountability Office's (GAO) *Standards for Internal Control in the Federal Government*, management should implement control activities through documented policies in the appropriate level of detail to effectively monitor the activity.

However, CBP did not always provide evidence to support whether it documented its decision-making process when planning for facilities. Additionally, CBP did not demonstrate that personnel analyzed alternatives before issuing contracts for temporary facilities or fully analyzed whether continuing to use the temporary facilities was cost effective.

CBP Did Not Always Document Its Facility Planning Decisions

CBP could not provide sufficient documentation to support the decisions it made regarding planning for facilities. The *Federal Records Act of 1950*³ requires agencies to make and preserve records that document the decisions, procedures, and essential transactions of the agency. Additionally, agencies must create and maintain records that document the formulation and execution of their decisions and make the records available for scrutiny by Congress or authorized Government agencies.⁴

Although CBP provided us with documentation it uses to help inform and support its decisions about facility needs, these documents did not show that CBP had examined migration data or conducted cost-benefit analyses to support its facility planning decisions. We determined that CBP collects migration and capacity data but did not document using the data when making decisions about its facilities.

We analyzed 35 months of CBP data from January 2020 through November 2022 on the daily average number of subjects in custody in all nine SWB sectors compared to CBP's holding capacities. We found that three sectors (Del Rio, El Paso, and Yuma) consistently exceeded their holding capacities and six sectors were regularly under their holding capacities. (Appendix C shows the results of our analysis for each of the nine SWB sectors.) For example, the Del Rio sector's average daily number of subjects in custody during this timeframe consistently exceeded its total holding capacity, as shown in Figure 3. Specifically, the Del Rio sector, which has a temporary facility, exceeded its total holding capacity for 13 of the 35 months that we reviewed.

³ 44 U.S.C. § 3101.

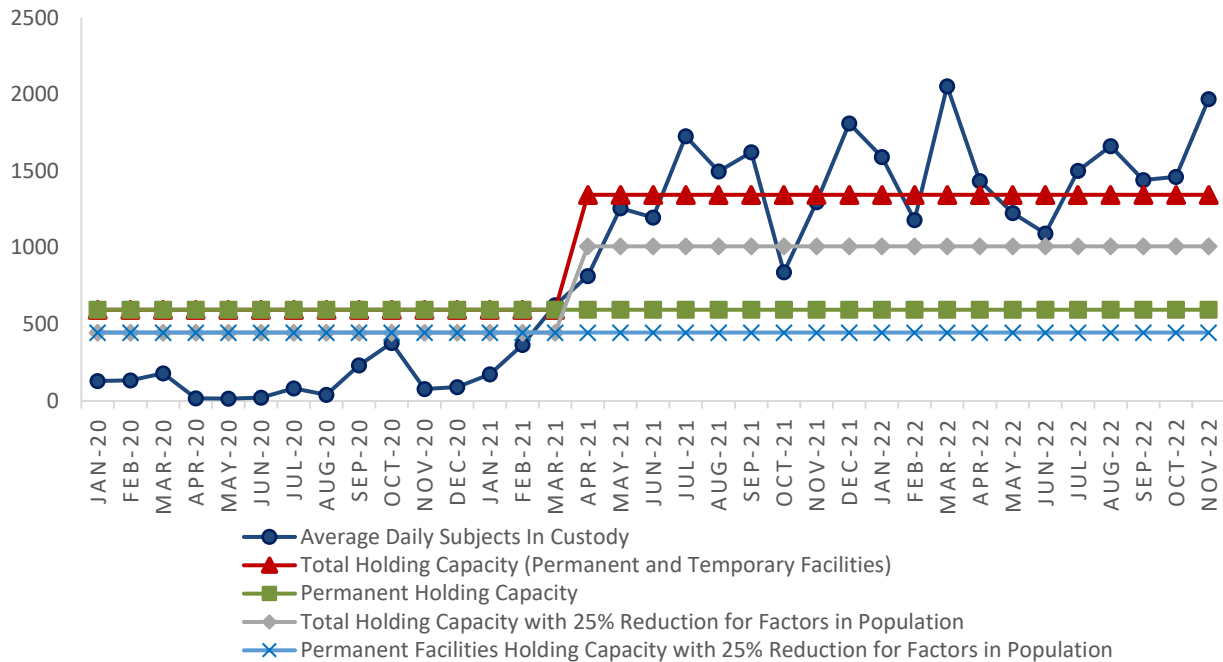
⁴ 36 Code of Federal Regulations § 1222.22; DHS Instruction 141-01-001, *Records and Information Management (Revision 01)*, September 2019.



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Figure 3. Comparative Analysis of Del Rio Average Daily Subjects in Custody to the Sector’s Holding Capacities⁵



Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily number of subjects in custody from January 2020 through November 2022

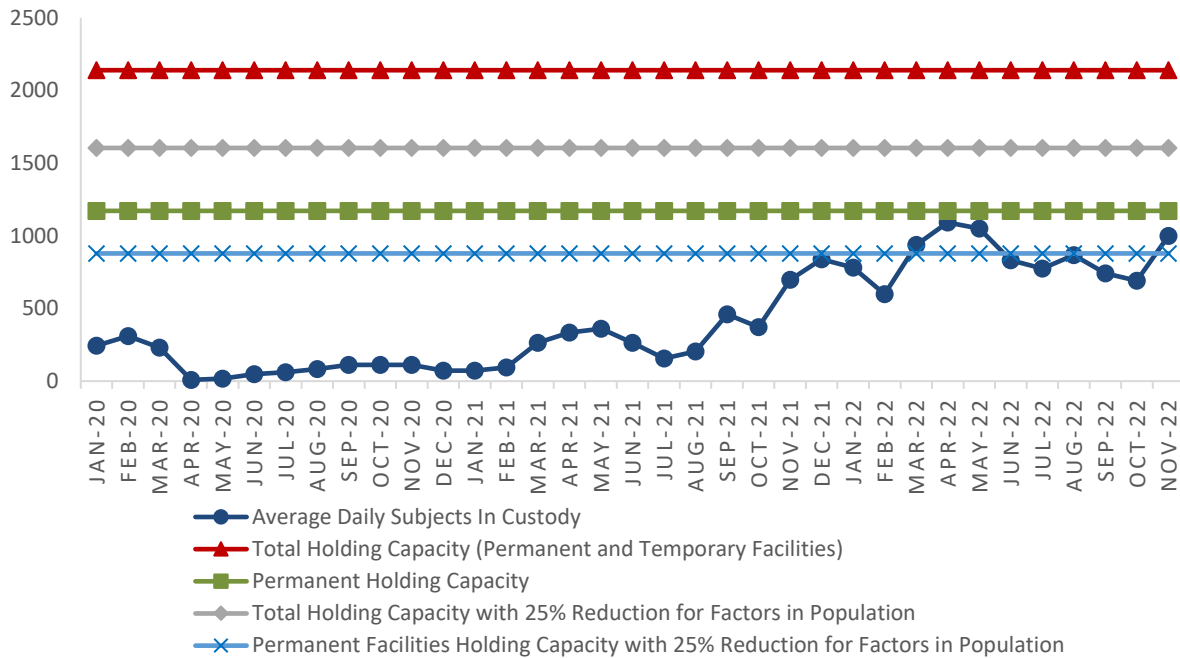
Conversely, the Laredo Sector, which has a temporary facility, has regularly been under its permanent holding capacity. As shown in Figure 4, Laredo’s average daily number of subjects in custody never exceeded its permanent holding capacity from January 2020 through November 2022.

⁵ For Figure 3 and other figures showing holding capacities, we also included calculations showing what a sector’s holding capacity would be when reduced by 25 percent. This is to account for factors in the population, such as demographics, gender, single adults, and family units, that may require separating or holding some individuals together, in effect, lowering the number of people who can be held in a facility.



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Figure 4. Comparative Analysis of Laredo Average Daily Subjects in Custody to the Sector’s Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily number of subjects in custody from January 2020 through November 2022

In addition to not documenting a capacity analysis, CBP officials did not consistently document whether they performed cost-benefit analyses to make informed decisions when planning for facility needs. In May 2022, in response to a congressional request, CBP developed a cost comparison of the use of temporary soft-sided and permanent facilities. According to CBP officials, this was the component’s first analysis of this type. It showed that temporary soft-sided facilities can be a cost-effective solution if they will be used for fewer than 6 years, at which point CBP could have funded a permanent facility. However, the cost-benefit analysis CBP performed in May 2022 was only done when needed for a specific purpose and is not a consistent part of CBP’s facilities planning process.

CBP Did Not Always Consider Alternatives before Issuing Contracts for Temporary Facilities

CBP did not ensure the Rio Grande Valley and Yuma sectors analyzed alternative options and documented this analysis before issuing contracts for



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temporary facilities. According to CBP, in FY 2022 it spent \$314 million on temporary soft-sided facilities in these sectors.

CBP provided documentation showing that, in response to migrant surges, Border Patrol recommended construction of temporary soft-sided facilities in Donna, Texas (in the Rio Grande Valley sector), due to factors such as its central location in the sector. The documentation to support this decision did not have a detailed explanation to justify temporary soft-sided facilities as the best solution. Border Patrol officials we interviewed confirmed they did not perform any analysis beyond analyzing custody numbers.

Although personnel in the Yuma sector conducted some analyses of alternatives before issuing an initial contract for a temporary soft-sided facility in Yuma, Arizona (see text box), these analyses could have been more thorough. For example, Yuma personnel considered leasing additional detention space. However, the documentation of their analysis did not include a direct comparison to the cost of operating a temporary facility for the same amount of time. Yuma's first temporary facility was in operation from June 2019 until May 2020, when it was taken down.

In March 2021, CBP awarded a contract for a new temporary soft-sided facility in Yuma. However, CBP did not revisit its review of the alternative solutions before issuing the new contract. CBP's documentation to justify this new temporary soft-sided facility did not include an examination of alternative solutions or a cost assessment. The documentation also described CBP's plans for supporting the new temporary soft-sided facility, which indicates that CBP already planned to move forward with the temporary facility without ensuring a complete analysis of alternatives.

CBP Did Not Regularly Reassess the Continued Need for Existing Temporary Facilities

CBP continued to authorize contract extensions for temporary facilities without providing the contracting office with detailed analyses to support the need for these facilities. We analyzed contracting documentation from June 2019 through December 2022 for the temporary soft-sided facilities in Donna and

Yuma Sector's Alternative Options Included:

Establish an **Inter-Agency Agreement** with the Yuma County Sheriff's Office to lease an annex detention facility in Yuma, Arizona, to ease capacity issues.

Establish a program allowing family units to be **released on their own recognizance** until they appear before a court.

Leverage U.S. Immigration and Customs Enforcement's Enforcement and Removal Operations to reduce the time between bed space requests, approvals, and transfers.

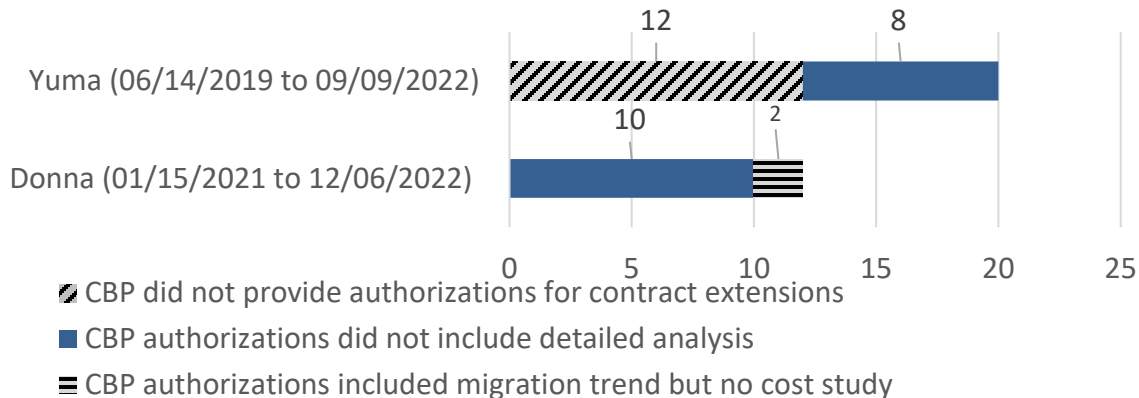
Source: DHS OIG analysis based on information provided by CBP



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the Yuma⁶ sector to determine whether authorizations included CBP’s documented analysis before awarding contract extensions. We found program officials could not provide authorizations to support 12 extensions to the contract for the Yuma temporary facility, and 8 of the authorizations did not have detailed analyses. Similarly, for the Donna temporary facilities, program officials provided authorizations for 10 contract extensions that did not have detailed analyses. Also, two Donna authorizations included migration trends but did not include a cost study (see Figure 5).

Figure 5. CBP Authorizations for Contract Extensions of Donna and Yuma Temporary Facilities



Source: DHS OIG analysis based on information provided by CBP

In addition, CBP did not provide support that it continually reassessed its need for one of the temporary soft-sided facilities in Donna while the facility was empty and not actively being used. In September 2022, the Rio Grande Valley sector⁷ recommended the Donna temporary facility be closed due to the unsustainably high cost and a drastic reduction in encounters. However, CBP leadership opted to keep the empty temporary facility on site and place it in a hold status. During a November 2022 interview, CBP officials confirmed they did not know or have a timeline for how long the temporary facility would remain on hold. However, CBP reopened the facility at the end of December 2022. CBP paid \$4.2 million to maintain the facility during the 3 months it was on hold.

CBP’s decision to continue to pay for the facility when it was not in use was not supported by migration data. The average daily number of subjects in custody

⁶ Yuma’s temporary facility was not operational from May 2020 through March 2021.

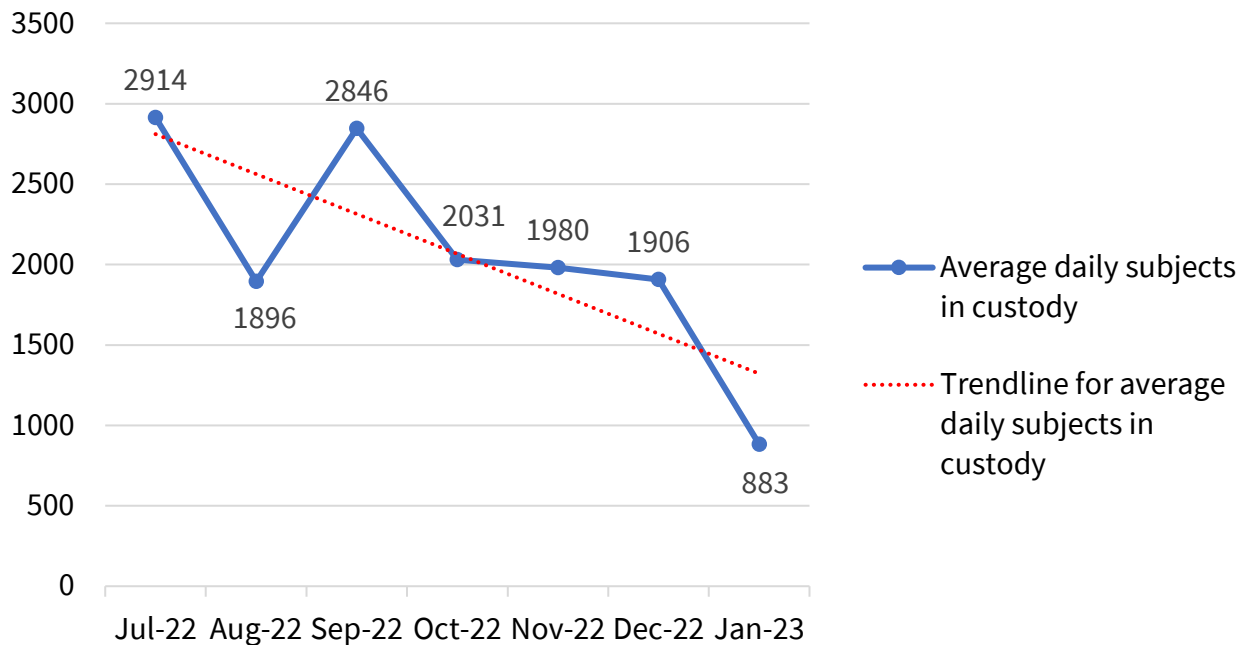
⁷ The Donna facility was used to support the Rio Grande Valley sector.



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in the Rio Grande Valley sector trended downward during the months the temporary facility was empty, as shown in Figure 6.

Figure 6. Average Daily Subjects in Custody in the Rio Grande Valley Sector and Corresponding Trendline



Source: DHS OIG analysis based on CBP’s average daily subjects in custody from July 2022 through January 2023

CBP’s Guidance for Planning Temporary and Permanent Facilities Is Not Comprehensive

The issues we identified occurred because CBP prioritized short-term response to migrant surges over long-term facility planning. To help with short-term response, CBP developed the *CBP Integrated SWB Mass Irregular Migration Contingency Plan* to quickly increase facility capacity. However, the plan remains in draft.

CBP does not have a comprehensive policy that incorporates planning for both temporary and permanent facilities along the SWB. Specifically, CBP does not require its personnel to document the use of all available migration information to make informed decisions regarding both temporary and permanent facilities. Also, CBP does not require sectors to identify and document analyses of all



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possible alternatives before establishing temporary facilities, or to reassess regularly the need for existing temporary facilities, including their cost-effectiveness.

Conclusion

Although CBP has improved its planning processes for temporary facilities, the component continues to rely on a reactive approach instead of developing a more proactive approach. By developing a comprehensive policy, CBP can ensure it spends money on facilities that are cost effective and in the best interest of taxpayers. Additionally, CBP will be more prepared for strains on its facilities from future migrant surges and better positioned to avoid overcrowding and inhumane conditions.

Recommendations

Recommendation 1: We recommend that the Commissioner of CBP finalize the draft *CBP Integrated SWB Mass Irregular Migration Contingency Plan*.

Recommendation 2: We recommend that the Commissioner of CBP establish a comprehensive, formal policy to:

- consistently document the use of all available information to make informed facility planning decisions;
- conduct and document analysis of all possible alternative options before establishing temporary facilities; and
- regularly reassess the continued need for existing temporary facilities and evaluate the cost-effectiveness of maintaining existing temporary facilities.

Management Comments and OIG Analysis

CBP concurred with both recommendations. In its management response, CBP was pleased that our report acknowledged its improved response to migrant surges by deploying temporary facilities to increase its capacity to process migrants along the SWB. CBP also provided technical comments to our draft report. We made changes to incorporate these comments as appropriate. A summary of CBP's responses and our analysis follows. We included CBP's management comments in their entirety in Appendix B.



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CBP Response to Recommendation 1: Concur. CBP is in the process of finalizing the *CBP Integrated SWB Mass Irregular Migration Contingency Plan*, which will implement the *DHS Southwest Border Mass Irregular Migration Contingency Plan*, dated February 2022. Estimated Completion Date: March 29, 2024.

OIG Analysis: We consider these actions responsive to the recommendation, which will remain open and resolved until CBP provides documentation that the plan was approved and implemented.

CBP Response to Recommendation 2: Concur. CBP uses an established annual Capital Facility Investment Planning process to inform and prioritize investments to its permanent facility infrastructure. CBP is committed to reducing the component's reliance on temporary soft-sided facilities and is planning and constructing permanent processing facilities as part of this transition. To support this effort, CBP plans to evaluate current processes to identify areas of improvement and will document, via policy, how temporary facility planning decisions will be made. The resulting policy will standardize documentation requirements, formalize a repository for documentation, establish guidelines for alternatives analysis, and document procedures to regularly reassess the continued need for temporary facilities. Estimated Completion Date: September 30, 2024.

OIG Analysis: We consider these actions responsive to the recommendation, which will remain open and resolved until CBP provides us with a copy of its issued policy.



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Appendix A

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

The objective of this audit was to determine to the extent to which CBP assessed and planned its needs for temporary and permanent facilities to process and hold migrants along the SWB. To answer our objective, we interviewed multiple CBP officials to gain an understanding of how CBP plans for facilities. We interviewed personnel from:

- Office of the Chief Readiness Support Officer
- Border Patrol sectors:
 - San Diego
 - El Centro
 - Yuma
 - Tucson
 - El Paso
 - Big Bend
 - Del Rio
 - Laredo
 - Rio Grande Valley
- Office of Facilities and Asset Management
 - Border Patrol and Air and Marine Program Management Office
 - Office of Facilities Management and Engineering
- Border Patrol Law Enforcement Operations Directorate
- Office of Acquisition
- SWB Coordination Center

We analyzed DHS and CBP policies, procedures, and other documents related to planning for facilities, migrant surges, and migrant detention. We also reviewed prior DHS OIG and GAO reports, media articles, and congressional testimony.

To assess CBP's facility planning, we performed an assessment comparing the average daily number of subjects in custody to each sector's holding capacities from January 2020 through November 2022. To determine the individual holding capacities of the nine SWB sectors, we corroborated information obtained through CBP interviews with supporting documentation. To determine each sector's average daily in-custody counts, we used data from CBP's public website and corroborated it with daily in-custody information



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pulled from the DHS Enforcement Integrated Database by DHS OIG's Office of Innovation. We found the data sufficient and reliable to support our analysis.

Additionally, we selected two locations with temporary facilities to assess whether CBP properly documented support for initially establishing the temporary soft-sided facilities and whether CBP assessed the continued need to use the soft-sided facilities. We judgmentally selected facilities in the Rio Grande Valley and Yuma sectors based on the location having a temporary facility that had been operational for more than a year or having more than one temporary facility. We obtained and analyzed documentation to determine how CBP used available data to plan for and make informed decisions regarding the use of the soft-sided facilities. We also reviewed documentation, such as contract agreements and issue papers,⁸ to confirm whether CBP performed analyses, reviewed alternatives, and justified continued use of the soft-sided facilities. Additionally, we requested documentation, such as project requirements documents⁹ and cost-benefit analyses toward the long-term planning process, regarding permanent facilities.

We assessed internal controls related to CBP's planning for permanent and temporary facilities used to process and hold migrants along the SWB. Our assessment revealed that CBP does not have adequate control activities and documentation for its policies and procedures as they relate to facility planning. However, because our internal control assessment was limited to the audit objective, it may not uncover other internal control deficiencies that potentially existed.

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

DHS OIG's Access to DHS Information

During this audit, CBP provided timely responses to DHS OIG's requests for information and did not delay or deny access to information we requested.

⁸ Issue papers are documents from the sector requesting a soft-sided facility.

⁹ Project requirements documents contain project details and authorizations for the construction of permanent facilities.



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Appendix B
CBP Comments to the Draft Report

1300 Pennsylvania Avenue, NW
Washington, DC 20229



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

August 9, 2023

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

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

8/9/2023

Signed by: HENRY A. MOAK JR

SUBJECT: Management Response to Draft Report: “CBP Could Do
More to Plan for Facilities Along the Southwest Border”
(Project No. 22-046-AUD-CBP)

Thank you for the opportunity to comment on this draft report. U.S. Customs and Border Protection (CBP) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

CBP is pleased to note the OIG’s positive recognition of its improved response to migrant surges by deploying temporary facilities to increase CBP’s capacity to humanely process migrants along the Southwest border (SWB). CBP secures the U.S. border against illegal entry, illicit activity, or other threats to uphold national sovereignty and promote national and economic security. In support of this mission priority, and as necessitated by the surge of migrants along the SWB, since 2019 CBP has deployed a series of temporary soft-sided facilities to provide short-term holding and support processing of migrants. CBP takes its role in providing care and ensuring health, safety, security, and welfare of each adult and child in its custody very seriously and remains committed to further strengthening its temporary and permanent facilities operations, while also being a good steward of the federal funds provided in support of its varied missions.

The draft report contained two recommendations with which CBP concurs. Enclosed find our detailed response to each recommendation. CBP previously submitted technical comments addressing several accuracy, contextual, sensitivity, and other issues under a separate cover for OIG’s consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.
Enclosure



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Enclosure: Management Response to Recommendations Contained in 22-046-AUD-CBP

OIG recommended that the Commissioner of CBP:

Recommendation 1: Finalize the draft “CBP Integrated SWB Mass Irregular Migration Contingency Plan.”

Response: Concur. CBP is in the process of finalizing the “CBP Integrated SWB Mass Irregular Migration Contingency Plan,” which will implement the “DHS Southwest Border Mass Irregular Migration Contingency Plan,” dated February 2022. Estimated Completion Date (ECD): March 29, 2024.

Recommendation 2: Establish a comprehensive, formal policy to:

- consistently document the use of all available information to make informed facility planning decisions;
- conduct and document analysis of all possible alternative options before establishing temporary facilities; and
- regularly reassess the continued need for existing temporary facilities and evaluate the cost effectiveness of maintaining existing temporary facilities.

Response: Concur. CBP utilizes an established annual Capital Facility Investment Planning (CFIP) process to inform and prioritize investments to CBP's permanent facility infrastructure. Given the urgent and unpredictable nature of migrant flow and associated U.S. Border Patrol (USBP) processing requirements on the SWB, temporary processing facility deployments do not follow the standard CFIP process. Instead, USBP determines capacity, sites, and priorities based on a comprehensive assessment, which considers current capacity, processing and transport operations, staffing, and proximity to partners.

CBP is committed to reducing the agency's reliance on temporary soft-sided facilities and is both planning, and constructing, permanent processing facilities as part of this transition. To support this effort, CBP will evaluate current processes to identify areas of improvement, and will document via policy, how temporary facility planning decisions will be made. The resulting policy will standardize documentation requirements, formalize a repository for documentation, establish guidelines for alternatives analysis, and document procedures to regularly reassess the continued need for temporary facilities. ECD: September 30, 2024.



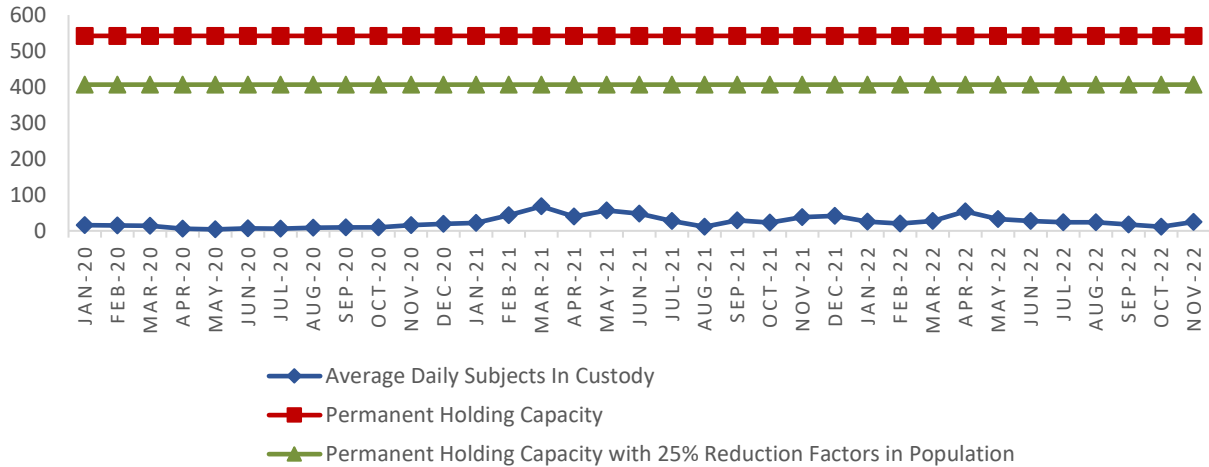
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Appendix C

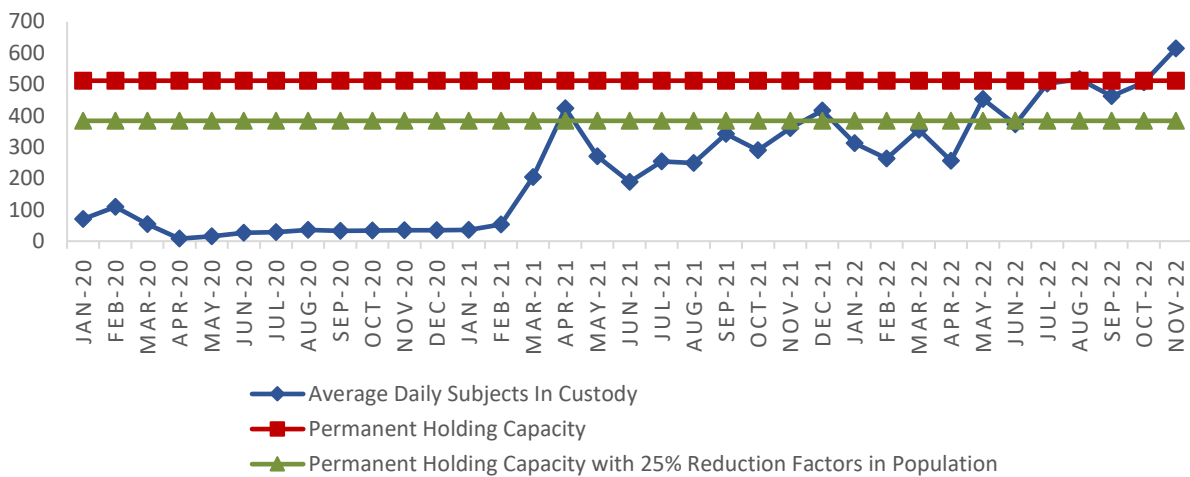
Comparative Analysis of Average Daily Subjects in Custody to Sector Holding Capacity

Figure 7. Comparative Analysis of Big Bend Average Daily Subjects in Custody to the Sector’s Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily subjects in custody from July 2020 through November 2022

Figure 8. Comparative Analysis of El Centro Average Daily Subjects in Custody to the Sector’s Holding Capacities



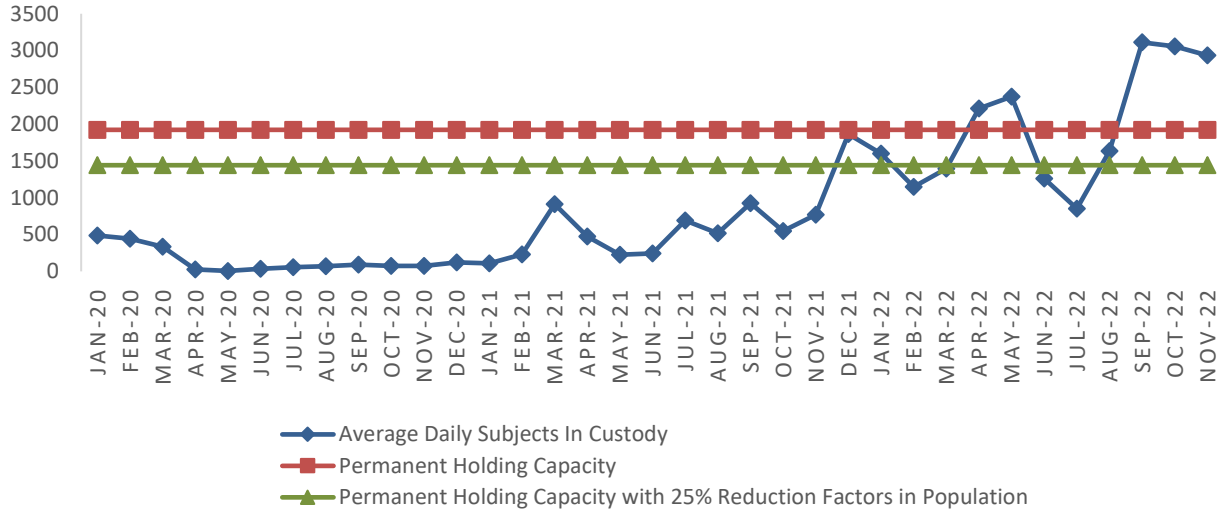
Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily subjects in custody from July 2020 through November 2022



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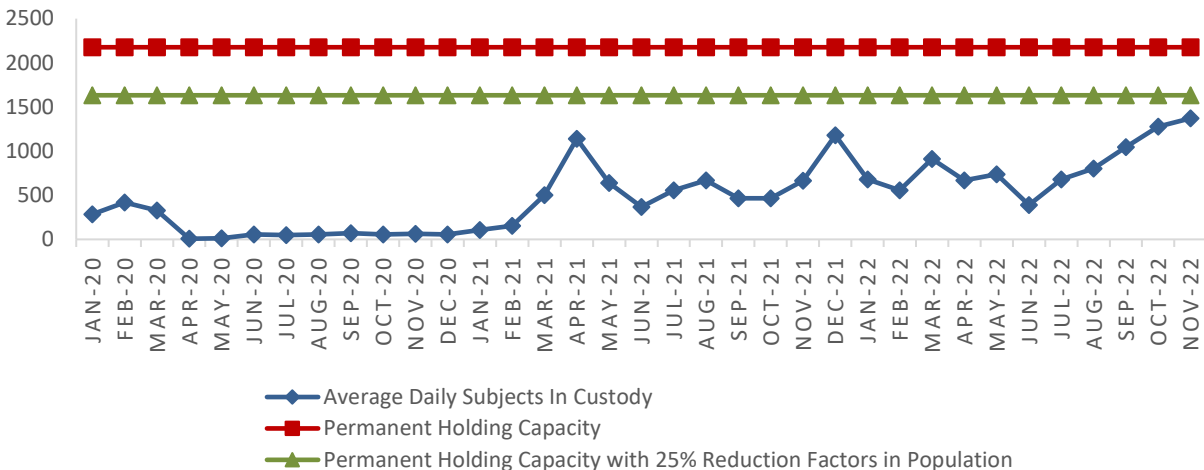
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Figure 9. Comparative Analysis of El Paso Average Daily Subjects in Custody to the Sector's Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP's average daily subjects in custody from July 2020 through November 2022

Figure 10. Comparative Analysis of San Diego Average Daily Subjects in Custody to the Sector's Holding Capacities



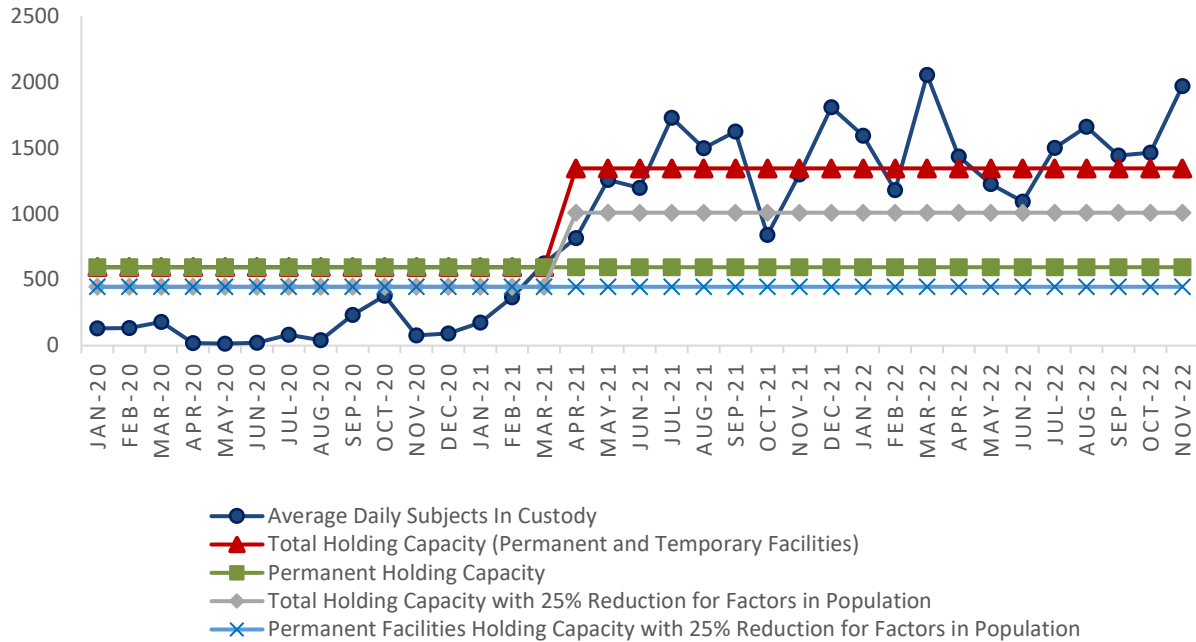
Source: DHS OIG analysis based on CBP sector holding capacities and CBP's average daily subjects in custody from July 2020 through November 2022



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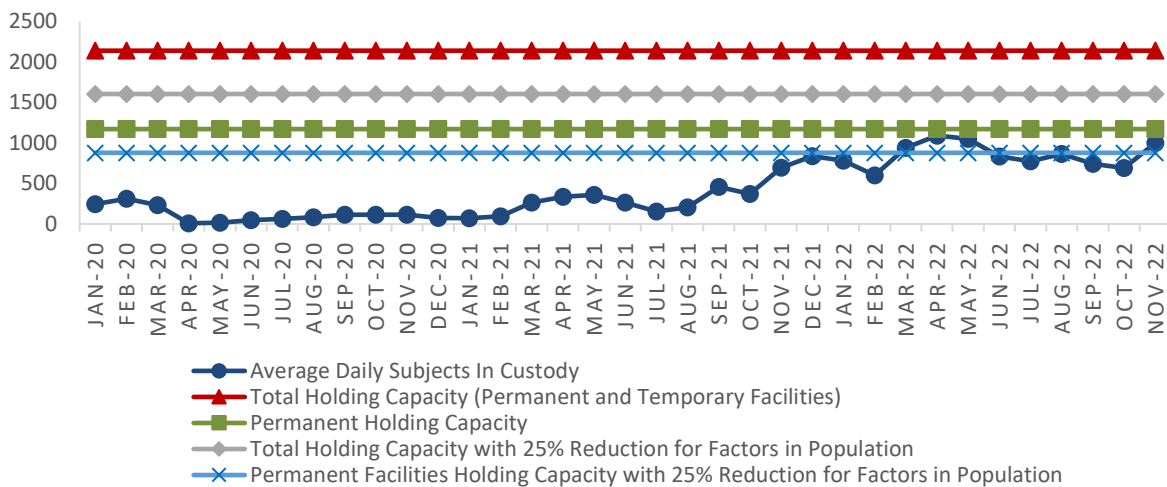
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Figure 11. Comparative Analysis of Del Rio Average Daily Subjects in Custody to the Sector's Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP's average daily number of subjects in custody from January 2020 through November 2022

Figure 12. Comparative Analysis of Laredo Average Daily Subjects in Custody to the Sector's Holding Capacities

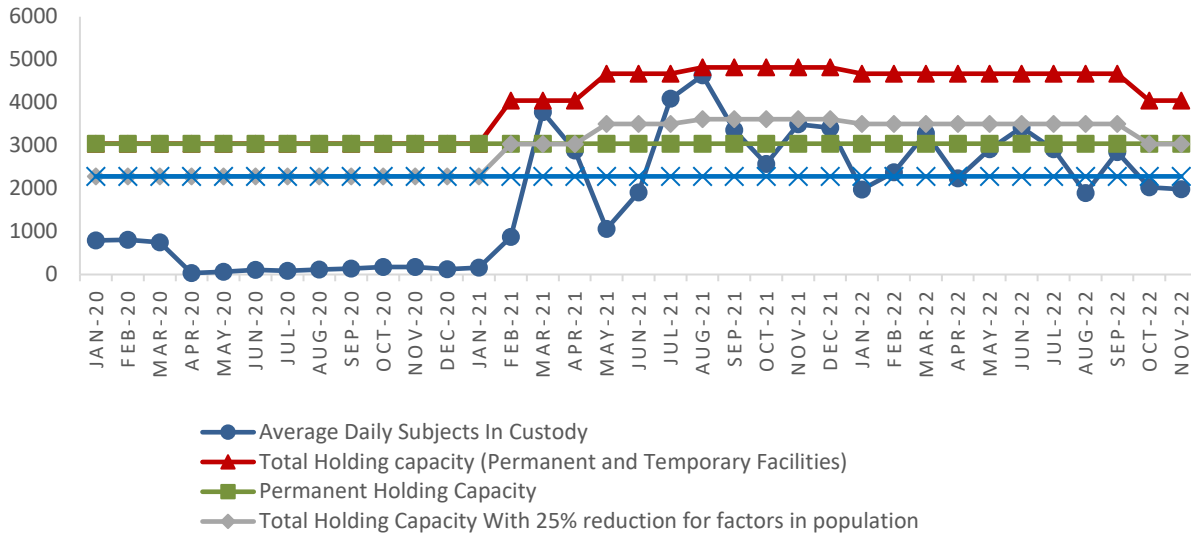


Source: DHS OIG analysis based on CBP sector holding capacities and CBP's average daily number of subjects in custody from January 2020 through November 2022



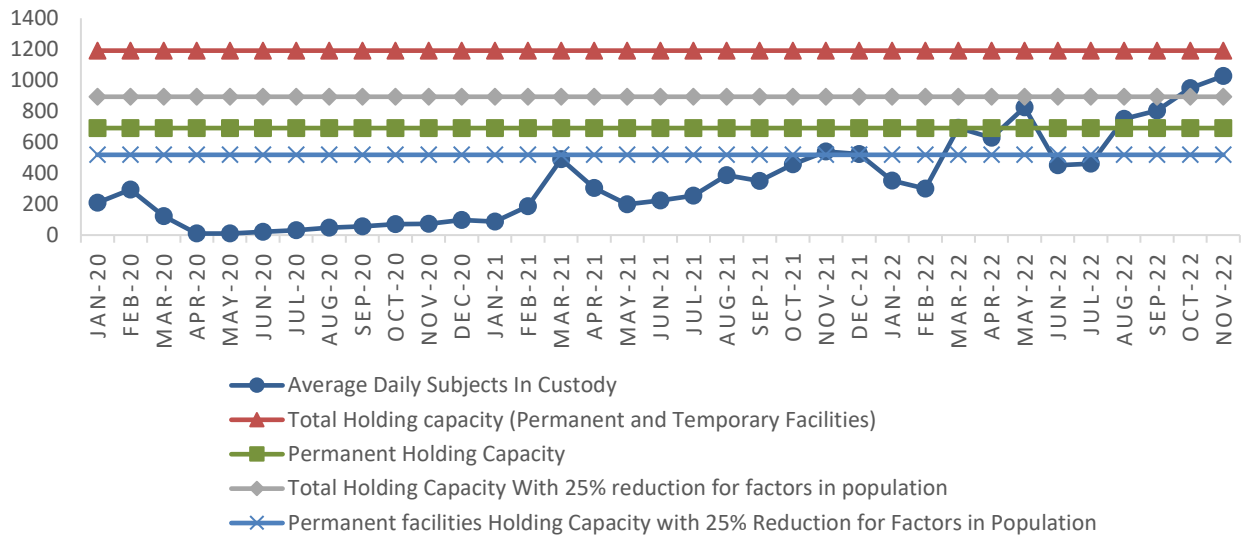
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Figure 13. Comparative Analysis of Rio Grande Valley Average Daily Subjects in Custody to the Sector’s Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily subjects in custody from July 2020 through November 2022

Figure 14. Comparative Analysis of Tucson Average Daily Subjects in Custody to the Sector’s Holding Capacities



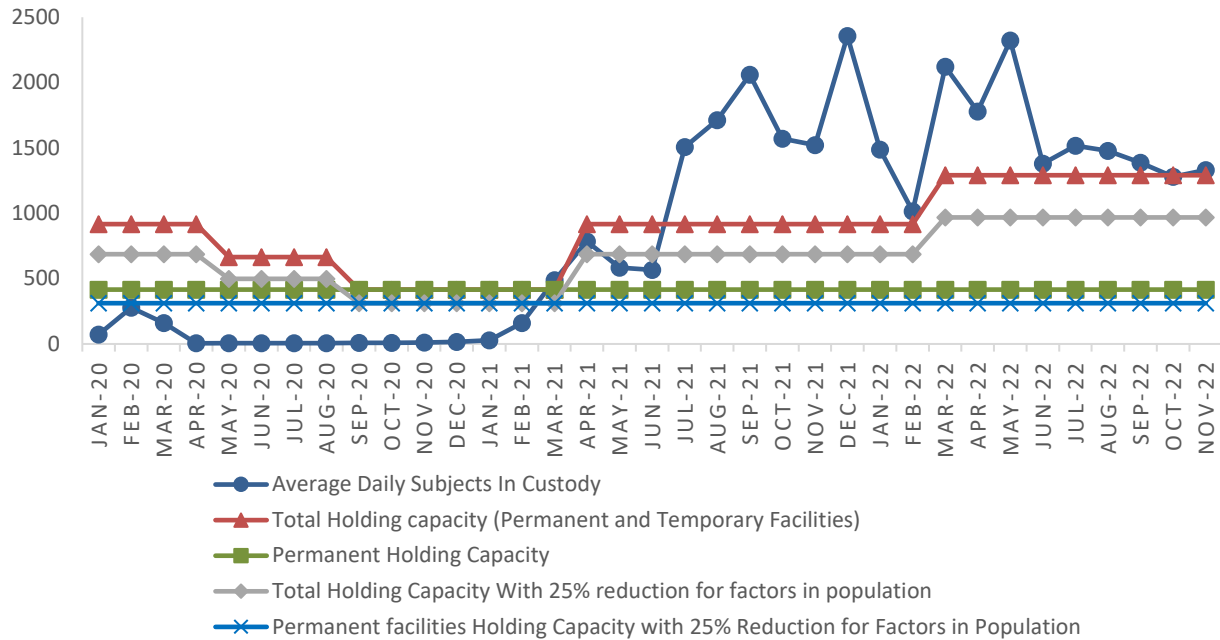
Source: DHS OIG analysis based on CBP sector holding capacities and CBP’s average daily subjects in custody from July 2020 through November 2022



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Figure 15. Comparative Analysis of Yuma Average Daily Subjects in Custody to the Sector's Holding Capacities



Source: DHS OIG analysis based on CBP sector holding capacities and CBP's average daily subjects in custody from July 2020 through November 2022



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