

**CBP Accounted for Its
Firearms but Did Not
Always Account for
Ammunition or Monitor
Storage Facilities**





OFFICE OF INSPECTOR GENERAL

Department of Homeland Security

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

September 27, 2023

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

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

SUBJECT: *CBP Accounted for Its Firearms but Did Not
Always Account for Ammunition or Monitor Storage
Facilities*

Digitally signed by
JOSEPH V CUFFARI
Date: 2023.09.27
14:18:00 -04'00'

Attached for your action is our final report, *CBP Accounted for Its Firearms but Did Not Always Account for Ammunition or Monitor Storage Facilities*. We incorporated the formal comments provided by your office.

The report contains seven recommendations aimed at improving controls and oversight of firearms and ammunition. Your office concurred with five recommendations and did not concur with two recommendations. Based on information provided in response to the draft report, we consider recommendations 6 and 7 open and unresolved. As prescribed by Department of Homeland Security Directive 077-01, *Follow-Up and Resolutions for the Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your (1) agreement or disagreement, (2) corrective action plan, and (3) target completion date for each recommendation. Also, please include responsible parties and any other supporting documentation necessary to inform us about the current status of the recommendations. Until your response is received and evaluated, the recommendations will be considered open and unresolved.

Based on information provided in response to the draft report, we consider recommendations 1, 2, 3, 4, and 5 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. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.



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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

cc:

John R. Morris, Executive Director, Law Enforcement Safety and Compliance Directorate

Matthew Klein, Assistant Commissioner, Office of Professional Responsibility



DHS OIG HIGHLIGHTS

CBP Accounted for Its Firearms but Did Not Always Account for Ammunition or Monitor Storage Facilities

September 27, 2023

Why We Did This Audit

CBP is one of the world's largest law enforcement organizations. In fiscal year 2022, CBP reported 126,750 firearms and about 105 million rounds of ammunition in its inventory. Our objective was to determine the extent to which CBP ensures the accountability of firearms and ammunition.

What We Recommend

We made seven recommendations to improve controls and oversight of firearms and ammunition.

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

U.S. Customs and Border Protection (CBP) accounted for its firearms but did not always maintain accurate records for firearm locations or quantities of ammunition, as required. During our physical inventory of firearms in storage at 12 sites, we identified 126 firearms not located at the address indicated in CBP's system of record. CBP also did not ensure ammunition control, accountability, and loss reporting complied with policy requirements for sensitive assets. Across the 12 inventoried sites, we identified differences between stored ammunition and amounts in CBP's system. These issues occurred because CBP did not emphasize controls over ammunition. As a result, CBP may not know whether ammunition has been lost, stolen, properly accounted for, or provided to officers for unofficial training and practice.

Further, CBP did not always monitor firearm and ammunition storage areas with video surveillance systems, as required. Some sites were missing exterior or interior surveillance, and others had issues with camera functionality and camera position. CBP did not always inspect its firearm and ammunition storage surveillance for functionality or, in some cases, adequately fund these systems. Without improved controls and oversight of firearms and ammunition, these sensitive assets could be lost, stolen, or misappropriated, which could impair CBP's mission and pose a public safety risk.

CBP Response

CBP concurred with five recommendations and did not concur with two recommendations.



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Abbreviations

AMO	Air and Marine Operations
BUF	Buffalo Niagara International Airport
CBP	U.S. Customs and Border Protection
ECC	Equipment Control Class
ECD	Estimated Completion Date
ELP	El Paso International Airport
EPT	El Paso Sector
FACTS	Firearms, Armor, and Credentials Tracking System
GAO	Government Accountability Office
IOD	Investigative Operations Division
LESC	Law Enforcement and Safety Compliance Directorate
MIA	Miami International Airport
MID	Management Inspections Division
MIP	Miami Sector
OFO	Office of Field Operations
OPR	Office of Professional Responsibility



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RAC	Resident Agent in Charge
SAC	Special Agent in Charge
SRT	Special Response Team
USBP	U.S. Border Patrol
VSS	video surveillance systems



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Background

With more than 60,000 employees, U.S. Customs and Border Protection (CBP), is one of the world's largest law enforcement organizations. CBP is charged with keeping terrorists and their weapons out of the United States while facilitating lawful international travel and trade. The authority for CBP officers and agents¹ (officers) to carry firearms is found in Federal law and regulations, specifically 8 United States Code § 1357 and 19 United States Code § 1589(a), and 8 Code of Federal Regulations § 287.8 and § 287.9.

Department of Homeland Security and CBP policies, memorandums, and other guidance govern CBP firearms and ammunition accountability, control, storage, and surveillance. DHS' *Personal Property Asset Management Manual*, May 22, 2018 (property manual),² defines a firearm as any weapon that can, is designed to, or may be readily converted to expel a projectile by the action of an explosive, including the frame or receiver of any such weapon or any sound suppression device. Figure 1 shows a typical CBP firearm. As of August 1, 2022, CBP reported 126,750 firearms in its inventory.

Figure 1. Typical CBP Firearm



Source: DHS Office of Inspector General photo

The property manual defines ammunition as an end item, complete round, or material component charged with explosives, propellants, pyrotechnics, or initiating composition for use in connection with defense or offense (including demolitions) as well as training, ceremonial, or non-operational purposes. Table 1 summarizes the quantity and cost of CBP ammunition purchases from fiscal years 2019 through 2022, and Figure 2 displays examples of CBP ammunition.

¹ CBP's *Use of Force – Administrative Guidelines and Procedures Handbook*, January 2021, defines "Authorized Officers/Agent" as CBP Officers, U.S. Border Patrol (USBP) Agents, Air and Marine Operations (AMO) Officers and Agents, Office of Professional Responsibility (OPR) Special Agents and Investigators, Office of Field Operations (OFO) Officers, and other qualified CBP personnel as designated by the Commissioner of CBP.

² DHS initially released this manual in 2013.



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Table 1. CBP Ammunition Purchases from FYs 2019 to 2022

Year	Ammunition Amount	Cost
2019	39,891,000	\$11,990,702
2020	72,015,651	20,964,851
2021	76,705,200	24,986,069
2022	47,067,850	16,971,416
Totals	235,679,701	\$74,913,038

Source: DHS OIG summary of CBP data

Figure 2. CBP Ammunition



Source: DHS OIG photo

The property manual assigns assets, such as firearms and ammunition, an Equipment Control Class (ECC) based on the consequences of loss of control. ECC levels for sensitive assets range from 1 to 3, depending on the potential impact of asset loss on the security, safety, and operation of the Department’s mission. Level 1 applies to assets that could result in loss of life and critical mission impairment. DHS designates firearms and ammunition as ECC level 1 assets. Examples of ECC 2 and ECC 3 assets include body armor and DHS cell phones, respectively. The ECC level assigned to an asset determines the internal control components must implement for asset accountability.

DHS components are responsible for establishing and maintaining an updated firearm asset management system of record. This requires documentation of all transactions and events, including when assets are lost or stolen, throughout the asset life cycle. Components must include a complete listing of all firearms in their system of record. Required data fields are:

- Authorized Asset User/Officer
- Manufacturer
- Model Number
- Serial Number
- Type of Firearm
- Location

Although the property manual deems ammunition expendable, given its dangerousness, components must also track its location, assignment, loss, damage, and destruction. The property manual specifically states:



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Ammunition Loss, Damage, and Destruction (LDD):

The standard event of a reportable loss is a single ammunition asset; however, components may develop policies and procedures that define a combination of condition and impact of loss that establishes the conditions for which the loss is reportable. If established, these policies and procedures are effective and reasonable, and included in the Component's Asset Accountability and Control Plan.

On January 18, 2017, CBP issued a memorandum, *Tracking Ammunition in FACTS*, with guidance for tracking ammunition in the Firearms, Armor, and Credentials Tracking System (FACTS). According to the memorandum, ammunition tracked in FACTS³ shall be strictly controlled and maintained and should be accounted for down to the single round; no location shall maintain “off the books” quantities of ammunition without written consent of the Executive Director of the Law Enforcement Safety and Compliance Directorate (LESC). Although CBP affirmed the importance of accounting for ammunition down to a single round, it has not developed policies and procedures that establish the condition for which a loss of ammunition is reportable.

DHS classifies firearms and ammunition as assets having a severe impact if lost, such as loss of life and critical mission impairment.

CBP's *Use of Force – Administrative Guidelines and Procedures Handbook*, January 2021⁴ (use of force handbook), outlines additional procedures and responsibilities related to accounting for firearms and ammunition. CBP also developed *Personal Property Asset and Accountability and Control Plans* (FYs 2019–2022), which further describe protocols for conducting required inventories and list the controls necessary to manage personal property.

The Executive Director of the LESL oversees control and accountability of all CBP firearms and ammunition. CBP's FACTS is used for oversight and lifecycle accountability for specified law enforcement assets and equipment, including firearms and ammunition. Each officer is also responsible for the general care, maintenance, and safekeeping of CBP-issued firearms and other accountable use of force equipment. The use of force handbook requires the Executive

³ The memorandum clarifies that non-lethal or less-lethal types of ammunition shall not be accounted for, recorded, or tracked in FACTS. Examples of non-lethal and less-lethal ammunition include marking cartridges and pepperball projectiles.

⁴ According to the Director of Policy, Force Review and Compliance Branch, LESL, CBP first issued the handbook as the *Use of Force Policy Handbook* in 2010. In 2014, CBP updated it to the *Use of Force Policy, Guidelines and Procedures Handbook*. In 2021, CBP separated the use of force policy from the administrative guidelines and procedures. We refer to the 2021 *Use of Force - Administrative Guidelines and Procedures Handbook* as the use of force handbook throughout this report.



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Director of the LESC to direct an inventory for all law enforcement assets accountable in FACTS at least once per year. Firearms instructors also physically inspect the serial numbers of all assigned firearms used during quarterly firearms proficiency demonstrations. Additionally, CBP is required to conduct a quarterly inventory of all unissued ammunition stored in vaults. All actions related to inventory verifications for both firearms and ammunition are to be recorded and maintained in FACTS. The use of force handbook also provides minimum requirements for firearms and ammunition storage, such as requiring these assets be placed out of plain view and in a location that affords reasonable protection against theft or unauthorized use. Earlier guidance, the *CBP Security Policy and Procedures Handbook*, April 2020 (security handbook), mandates video monitoring of all permanent and temporary weapons and ammunition storage areas. CBP must also provide video surveillance for the exterior entrance, issue ports, and the interior of weapons storage areas.

Finally, the CBP Management Inspections Division (MID) provides information and analysis about the effectiveness, integrity, and performance of CBP and identifies and makes recommendations to address potential vulnerabilities. CBP MID has also conducted reviews and evaluations of firearms and ammunition, which identified inadequate policies and procedures, inconsistent tracking of ammunition data in FACTS, ammunition storage not meeting physical security standard requirements, and other related areas for improvement. According to a CBP official, MID also oversees the annual Self-Inspection Program, in which CBP managers complete worksheets developed by program managers on the operational, financial, and administrative functions under their control.

Results of Audit

CBP accounted for its firearms but did not always maintain accurate records for firearm locations or quantities of ammunition, as required. During our physical inventory of firearms in storage at 12 sites, we identified 126 firearms not located at the address indicated in CBP's FACTS. Additionally, CBP did not ensure ammunition control, accountability, and loss reporting complied with policy requirements for sensitive assets. Across the 12 inventoried sites, we identified differences between stored ammunition and the amounts recorded in FACTS. These issues occurred because CBP did not emphasize controls over ammunition. As a result, CBP may not know whether ammunition has been lost, stolen, properly accounted for, or provided to officers for unofficial training and practice.

Further, CBP did not always monitor firearm and ammunition storage areas with video surveillance systems (VSS), as required. We found that 5 sites did not have exterior surveillance, 10 sites did not have interior surveillance, and 3



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sites had issues with functionality and camera position. CBP did not always inspect its firearm and ammunition storage surveillance for functionality or, in some cases, adequately fund these systems. Without improved controls and oversight of firearms and ammunition, these sensitive assets could be lost, stolen, or misappropriated, which could impair CBP's mission and pose a public safety risk.

CBP Accounted for Its Firearms but Did Not Always Maintain Accurate Records of Firearm Locations

CBP accounted for its firearms but did not always maintain accurate records of firearm locations. The DHS property manual and CBP policies establish requirements for firearms control and accountability such as storage, inventory, and loss reporting. However, during our physical inventory of stored firearms at 12 sites, we identified 126 firearms that were not located at the address in FACTS. FACTS contained the work address of the officer responsible for the firearm instead of where the firearm was held in storage. The absence of accurate location data may increase the risk that a firearm cannot be located should the need arise.

CBP maintained an accurate physical inventory of its firearms and tracked its firearm inventory, including lost and stolen firearms in FACTS, as required. CBP considers firearms accounted for when assigned to a specific person by serial number and associated with a specific geographic location in FACTS. To determine the extent to which CBP accounted for its firearms, we tested a statistical sample of 383 firearms in FACTS to determine if CBP was in possession of each firearm. CBP officers provided photographic evidence of the firearm serial numbers in their custody. Additionally, we reviewed 1,032 firearms inventoried at 12 CBP locations to verify whether firearm records in FACTS, such as firearm types, serial numbers, and addresses, were complete and accurate. In our statistical sample and site visit testing, we did not identify any lost or stolen firearms. CBP accounted for firearms lost and stolen from FYs 2019 through 2021 in FACTS.⁵ Figure 3 shows firearms stored at a CBP facility.

Although CBP accounted for its firearms, we determined that firearms in storage were not always located at the address indicated in FACTS. DHS' property manual states that DHS' minimum recording data elements for firearms include specific location information, such as city, state, building, room number, and organization or functional area, assigned to the firearm.

⁵ CBP reported 162 lost and stolen firearms during FYs 2019 through 2021, of which 58 have not been recovered.



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Figure 3. Firearms Stored at a CBP Facility



Source: DHS OIG photo

Based on the results of our physical inventory of firearms at 12 sites, we found 126 firearms in storage not located at the address indicated in FACTS. For example, FACTS indicated seven unissued firearms were located at an address in Bangor, Maine. In fact, the firearms were located 685 miles away in Buffalo, New York. During our site visit in Miami, Florida, CBP staff could not locate one unissued firearm. Later, CBP staff found the firearm at another location and provided photographic evidence that the firearm was in their possession.

This occurred because CBP did not follow DHS policy requiring that firearm data in the system of record reflect asset location. CBP recorded in FACTS the addresses of firearms by assigned user duty station and shipping address but did not complete the “Physical Location” field. As a result, the location data in FACTS did not always reflect the actual location of the stored firearm, which may have increased the risk a firearm could not be located.

CBP Did Not Ensure Ammunition Control and Accountability

CBP did not ensure ammunition control, accountability, and loss reporting was consistent with requirements for an ECC level 1 asset. The DHS property manual classifies ammunition as an ECC level 1 asset and indicates that, although ammunition is expendable property, due to its level of sensitivity and dangerous nature, it requires special control and accounting to ensure accountability and safeguarding. Also, according to the property manual, loss of a single ammunition asset is a reportable event unless components develop policies and procedures that establish conditions for when a loss is reportable.

CBP guidance states that all ammunition shall be strictly controlled and maintained and accounted for down to the single round.

CBP’s *Tracking Ammunition in FACTS* memorandum states that all ammunition shall be strictly controlled and maintained. All ammunition received, used, and transferred must be captured in FACTS and accounted for down to the single round.

The U.S. Government Accountability Office’s (GAO) *Framework for Managing Fraud Risks in Federal Programs* further states that organizations should design and implement a strategy with specific control activities to mitigate



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assessed fraud risks, such as asset misappropriation. Although CBP had several controls in place, we determined CBP did not accurately and completely track ammunition or changes in the amounts stored and recorded in FACTS. CBP's ammunition records were not accurate or complete. As a result, CBP may not know whether ammunition was lost, stolen, properly accounted for, or provided to officers for unofficial firearms training and practice.

Quarterly Inventories Were Not Useful in Identifying Why Amounts of Stored Ammunition Differed from Recorded Amounts

According to CBP's *Personal Property Asset and Accountability and Control Plans* (FYs 2019–2022), CBP must inventory all unissued ammunition stored in vaults on a quarterly basis. We found the inventories were not useful in identifying why the amount of stored ammunition differed from what was previously recorded in FACTS. Specifically, when differences in amounts were identified during the quarterly inventories, officers did not adequately explain why the amounts differed. These adjustments were recorded as a separate inventory adjustment within FACTS but not included as part of the quarterly inventory report. For example, in both FY 2019 and FY 2021, we found cases involving more than a million rounds of ammunition recorded in FACTS as having been removed from a vault. Explanatory comments for each case indicated "Quarterly Vault Inventory" and "Vault totals adjusted to reflect current inventory," respectively. In addition to not adequately explaining the reason for the differential in ammunition amounts in FACTS, the comments were not part of the required quarterly inventory report.

CBP has developed user guides that describe how to perform certain functions within FACTS. CBP's FACTS user guide for "Quarterly Ammo Inventory" states the quantity should be the current on-hand balance (by rounds) officers have for that specific ammunition product but does not provide instruction on capturing or explaining discrepancies. CBP does not have a FACTS user guide for completing ammunition adjustments, including guidance on adding comments explaining discrepancies.

Although quarterly inventories and ammunition adjustments require a two-person verification, this control did not always ensure the amounts adjusted in FACTS were adequately explained. As indicated previously, CBP has not established any conditions for which an ammunition loss is reportable. A CBP LESC official said ammunition is a non-serialized, expendable item and therefore would not be reported as lost or stolen. As a result, CBP does not know to what extent the changes in ammunition quantities recorded in inventory adjustments represented ammunition that was lost, stolen, properly accounted for, or provided to officers for unofficial firearms training and practice.



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Table 2 shows the amounts of ammunition removed or added from the balance in FACTS as a result of inventories conducted in FYs 2019 through 2022.

Table 2. Examples of Ammunition Adjustments and Comments in FACTS, FYs 2019–2022

FY	Amount of Ammunition Adjusted	Comment added by CBP Officer
2019	1,078,740 rounds removed	“Quarterly Vault Inventory”
2019	48,750 rounds removed	“I counted the bullets”
2019	27,300 rounds added	“.”
2020	44,850 rounds removed	“Ammo was counted, correction’s [sic] were made.”
2020	4,900 rounds removed	“none”
2020	17,900 rounds removed	“Ammo used recently”
2021	1,093,000 rounds removed	“Vault totals adjusted to reflect current inventory”
2021	33,300 rounds added	“N/A”
2021	32,600 rounds added	“Updated Count”
2022	149,200 rounds removed	“Inventory Complete”
2022	20 rounds added	“Found some loose ammo”
2022	2,100 rounds added	“\$\$”

Source: DHS OIG analysis of CBP data

As summarized in Table 3, CBP did not perform required inventories of all vaults because it has not implemented a control in FACTS to ensure inventories are completed as required. According to one LESC official, if users do not record completing an inventory in FACTS by the required date, they must verify completing the next quarterly inventory before they can continue to use FACTS. Although this control may help address gaps in the completion of some quarterly inventories, it does not ensure all quarterly inventories are completed in a timely manner.



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Table 3. Number of CBP Ammunition Vaults for which Quarterly Inventories Were Not Completed, 2019–2021*

FY	Quarter 1	Quarter 2	Quarter 3	Quarter 4
2019	50	54	42	33
2020	25	28	19	15
2021	20	11	16	18

Source: DHS OIG analysis of CBP data

* The total number of ammunition vaults varied each quarter

CBP also does not track “proficiency ammunition.”⁶ CBP allows handgun proficiency ammunition, contingent upon availability, to be issued to each officer upon request. The proficiency ammunition is issued in addition to the handgun ammunition provided to each officer for official use and firearms qualifications. FACTS users can create entries for when officers are issued ammunition not associated with a qualification or training event. CBP does not require recording or tracking the name of officers issued proficiency ammunition or comments describing the entry in a way that would be reportable to CBP management.

A LESC official confirmed that there is currently no way to track ammunition issued for proficiency use. During our site visits, some CBP officers said they did not track ammunition issued for such use and instead included the amount in other FACTS entries, such as ammunition used for official on-duty training. Such practices do not clearly identify ammunition used for official training and duty purposes and ammunition issued for proficiency use. Tracking this information could give CBP better oversight of ammunition use and distribution.

⁶ According to the Director of Policy, Force Review and Compliance Branch, LESC, ammunition can be issued to officers for unofficial, on and off-duty firearms training and practice and is referred to as “proficiency ammunition.”



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CBP's Ammunition Records Were Not Accurate or Complete

CBP and DHS have several policies, memorandums, and guidance related to accountability and control of ammunition. CBP's use of force handbook states as ammunition inventory changes, it shall be accounted for and recorded in FACTS. According to CBP's memorandum, *Tracking Ammunition in FACTS*, all ammunition received, used, and transferred shall be captured in FACTS and shall be accounted for down to the single round. Additionally, no CBP location shall maintain "off the books" quantities of ammunition without the written consent of the Executive Director of the LESC. CBP requires responsible supervisory personnel to ensure ammunition inventory is, at a minimum, recorded in FACTS monthly. Figure 4 shows ammunition stored at a CBP facility.

Figure 4. Ammunition Stored at a CBP Facility



Source: DHS OIG photo

During our physical inventory of ammunition at 12 CBP locations, we determined that in FACTS, CBP overstated its ammunition inventory by up to 25,315 rounds at some sites and understated its inventory by up to 3,387 rounds at others.⁷ We also found CBP did not record 14,017 ammunition rounds in FACTS, as required, and commingled⁸ different types of ammunition in its inventory records. Table 4 provides a summary of the inventory discrepancies by CBP office.

⁷ For purposes of this audit, the term "overstated" refers to a location storing less ammunition on site than listed in FACTS. The term "understated" refers to a location storing more ammunition on site than listed in FACTS. Because CBP locations store different types of ammunition, ammunition can be both overstated and understated based on the type of ammunition.

⁸ For purposes of this audit, the term "commingled" refers to combining two different types of ammunition in the same record in FACTS.



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Table 4. DHS OIG Observations Regarding Ammunition Inventories at CBP Sites Visited in FY 2023

Locations in Buffalo, New York; Miami, Florida; and El Paso, Texas	Total Rounds in FACTS	Amount Overstated	Amount Understated	Rounds Not in FACTS
USBP Miami Sector (MIP) Dania Beach Station	6,570	446	3,077	2,057
AMO Miami Air and Marine Branch	497,590	0	130	0
OPR Investigative Operations Division (IOD) Miami Field Office	59,155	11,550*	0	11,550*
OFO Miami International Airport (MIA) Miami Airport Narcotics Division**	1,921,824	**	**	**
USBP Buffalo Sector Niagara Falls Station	9,870	20	0	7
AMO Great Lakes/Buffalo Marine Unit	283,570	195	140	403
OFO Buffalo Niagara International Airport (BUF) Buffalo Inspections Division	866,190	13,104	40	0
OPR IOD Buffalo Resident Agent in Charge (RAC)	59,010	0	0	0
USBP El Paso Sector (EPT) El Paso Station	383,465	0	0	0
OFO El Paso International Airport (ELP) El Paso Passenger Inspection Division	587,240	0	0	0
AMO El Paso Air Branch	318,275	0	0	0
OPR IOD El Paso Field Office Special Agent in Charge (SAC)	87,930	0	0	0
Totals	5,080,689	25,315	3,387	14,017

Source: DHS OIG analysis of CBP data and physical inventories

*This amount was not recorded in FACTS with the correct manufacturer and product identification.

**We were unable to verify the total amount of ammunition at this location due to a scope limitation. See Appendix A for additional details.



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Figure 5. Example of Ammunition Stored at a CBP Facility



Source: DHS OIG photo

We confirmed the Executive Director of the LESC did not provide written consent for any location we visited to maintain “off the books” quantities of ammunition. Some CBP officers at these locations attributed the discrepancies to counting errors, although many officers did not provide a reason for the discrepancies. Many locations maintained large quantities of ammunition, as shown in Figure 5, which may increase the risk of human error when hand counting the ammunition for inventory purposes. At one location, the firearms instructor said, “off the books” ammunition was maintained on purpose as a “buffer.” At another location, 11,550 rounds were associated with commingling records of the same type of ammunition with different product specifications. As a result, the quantity in FACTS was overstated by this amount and

stored ammunition was not recorded properly in FACTS. CBP’s *Authorized Equipment List*, January 2022, includes specific caliber, projectile, manufacturer, and product identification information, which is captured in the same detail within FACTS. Commingling ammunition may prevent CBP from identifying accurate quantities of authorized ammunition.

In some cases, poor storage practices contributed to the discrepancies. CBP’s security handbook directs officers to store unsealed packages and loose ammunition in metal containers. However, at 9 of 12 sites, we observed open boxes or bags of ammunition. At one location, two ammunition boxes were opened with ammunition removed and then resealed with tape, as shown in Figure 6. In both instances, this ammunition was counted as a full box in CBP’s inventory, which contributed to the discrepancies noted above.

The same location shared the ammunition vault with a local CBP Special Response Team (SRT) that used a paper log to record ammunition removed from the physical vault. This ammunition was then stored by the SRT at a separate location inaccessible to the CBP personnel responsible for ammunition accountability in the vault and contributed to the discrepancies noted above. Since our site visit, personnel at

Figure 6. Ammunition Box Resealed with Tape



Source: DHS OIG photo



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this location said CBP has created a separate ammunition vault in FACTS for the SRT and transferred ammunition as applicable. However, in total, officials at only two of six sites with discrepancies said they took action to correct their FACTS records following our site visits.

Finally, CBP developed a standard form to assist offices in tracking ammunition. *Tracking Ammunition in FACTS* states that any CBP locations that issue ammunition frequently or move ammunition in and out of their vaults frequently due to the pace of training should use CBP Form 316A and CBP Form 316B to account for the current quantity of ammunition within the vault. Form 316A is an ammunition inventory control sheet that includes the type, rounds at the beginning of reporting period, rounds expended, rounds received, and rounds at the end of the reporting period. Form 316B is an ammunition use log that records issuance date, issued to (last name, first name), issued by, amount issued, amount received, and amount on hand. At 8 of the 12 inventoried sites, CBP officers said they do not use these forms and were unaware of their existence.

These ammunition and accountability issues occurred because the LESC does not emphasize controls over ammunition. The LESC has not established a loss reporting threshold for ammunition or developed guidance and procedures for adjusting ammunition levels and tracking ammunition issued for proficiency use. The LESC also has not implemented an inventory verification process that identifies and resolves discrepancies. Although ammunition is classified as an ECC level 1 asset, one LESC official compared ammunition to a box of pens. Given the LESC's role in overseeing the control and accountability of CBP ammunition, this comparison is inconsistent with DHS and CBP policy requirements surrounding ammunition accountability. According to GAO's *Standards for Internal Control in the Federal Government*, oversight bodies and management set the tone at the top and throughout the organization by their example. Without a strong tone at the top, risk responses may be inappropriate, control activities may not be appropriately designed, and results of monitoring may not be acted upon to remediate deficiencies.

As a result, CBP did not know to what extent ammunition, which DHS considers a sensitive, dangerous, and hazardous item, was lost, stolen, properly accounted for, or provided to officers for firearms proficiency. For example, in FY 2020, the CBP OPR sustained an allegation that a CBP officer accumulated over 1,000 rounds of proficiency ammunition and did not properly secure it at his residence. This officer gifted his cousin several boxes of ammunition, and the officer's son posted the ammunition for sale online. According to an OPR official, the employee received verbal counseling following the incident.



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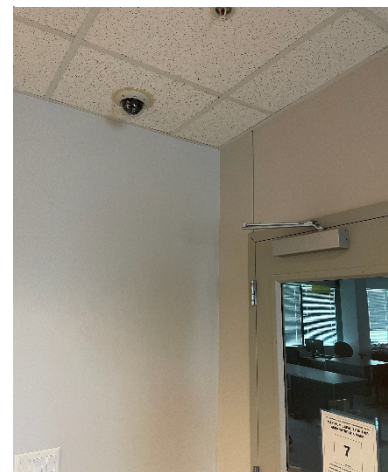
CBP Did Not Always Ensure Firearms and Ammunition Storage Areas Were Monitored with Video Surveillance

CBP did not always monitor firearm and ammunition storage areas with functional VSS. Across the 12 inventoried sites, we found that 5 sites did not have exterior VSS, 10 sites did not have interior VSS,⁹ and 3 sites had issues with camera position and functionality (see Appendix C and Figure 7).

According to the security handbook, unless continuously guarded or under constant surveillance so that unauthorized entry into and around storage areas can be detected, video monitoring must be provided for all permanent and temporary weapons and ammunition storage areas. CBP must also provide video surveillance for the exterior entrance, issue ports, and the interior of the armory. The CBP OPR Security Management Division is responsible for conducting risk assessments of a facility to identify weaknesses in a security device, system, processes, or other areas that may be exploited and make recommendations to eliminate or mitigate those weaknesses. The division must administer these risk assessments every 3 or 5 years, based on the risk level of the facility. Responsible officials (for example, Port Directors and Chief Border Patrol Officers, etc.) at each location are responsible for video surveillance functionality and installation at each site.

In addition to not having video surveillance systems in required areas, we also observed issues with functionality and camera position. At one location, a camera was facing one of two ammunition storage rooms and officials could not move the camera to observe the second ammunition room. A technician on site said the camera was overheating and replaced the camera during our site visit. At two locations, cameras were not positioned to view the firearm storage entrance, as shown in Figure 7. In another location, the camera monitoring the outside of the weapons storage area was not functioning. Appendix C shows a summary of CBP's firearm and ammunition storage video surveillance risk assessment and our observations during site visits.

Figure 7. Camera Facing Away from the Firearm Storage Entrance



Source: DHS OIG photo

Responsible officials were not always aware of problems with the cameras, were not always familiar with CBP policy requirements, and cited a lack of funding for these systems. Some officials also believed they were meeting the minimum video surveillance requirements.

⁹ CBP has developed a draft policy update that removes the requirement for an interior camera in weapons storage areas. At the time of our site visits, the requirement for interior cameras was in effect.



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CBP's annual Self-Inspection Program does not currently include a process to periodically inspect and verify the position and functionality of video surveillance systems monitoring firearm and ammunition storage areas. Risk assessments conducted at these facilities lacked specificity in describing noncompliance with firearms and ammunition storage security requirements. For example, a 2019 risk assessment stated, "ensure camera surveillance system adequately covers facility perimeter/doors, parking areas and access-controlled areas (i.e., LAN and Weapons Storage rooms)." This assessment was not specific to the interior or exterior camera system related to weapons storage areas. Other completed risk assessments did not always describe whether there were problems with weapons or ammunition storage area video surveillance.

Although we identified issues with video surveillance requirements, we also identified other physical controls that may help mitigate security risks. In this respect, we observed door locks, Personal Identity Verification card scanners, intrusion detection systems, and firearms and ammunition stored out of view. Still, the absence of video surveillance may increase the risk of undetected loss of these sensitive assets.¹⁰

Recommendations

Recommendation 1: We recommend the Executive Director, Law Enforcement Safety and Compliance Directorate implement a process to ensure recordation, for each stored firearm, of the physical location, including street address, and specific location within the facility, in the Firearms, Armor, and Credentials Tracking System.

Recommendation 2: We recommend the Executive Director, Law Enforcement Safety and Compliance Directorate improve the quarterly ammunition inventory process by ensuring that it reflects or captures differences and explanations between stored amounts and amounts listed in the Firearms, Armor, and Credentials Tracking System.

Recommendation 3: We recommend the Executive Director, Law Enforcement Safety and Compliance Directorate develop and implement a process to ensure all quarterly ammunition inventories are completed.

Recommendation 4: We recommend the Executive Director, Law Enforcement Safety and Compliance Directorate develop and implement a process to track proficiency ammunition issued to officers.

Recommendation 5: We recommend the Executive Director, Law Enforcement

¹⁰ We are conducting a separate audit regarding CBP's use of VSS at land ports of entry.



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Safety and Compliance Directorate develop and implement a process to track lost or stolen ammunition, including specifying reporting thresholds.

Recommendation 6: We recommend the Assistant Commissioner, Office of Professional Responsibility, in coordination with the Director, Management Inspections Division, develop and implement, through CBP's Self-Inspection Program, a process to periodically inspect and verify the position and functionality of video surveillance systems monitoring firearm and ammunition storage areas.

Recommendation 7: We recommend that the Commissioner of CBP develop and implement a corrective action plan to ensure firearms and ammunition video surveillance systems are installed in required areas, functioning, and correctly positioned at the 11 locations with issues identified in this report.

Management Comments and OIG Analysis

CBP concurred with five recommendations and did not concur with two recommendations. Appendix B contains a copy of the CBP's response in its entirety. CBP also provided technical comments to our draft report, and we made changes to incorporate these comments, as appropriate. In its response to the draft report, CBP claimed that our recommendations to increase inspections and install VSS were not based on violation of policy. However, we based our findings on requirements in the *CBP Security Policy and Procedures Handbook*, April 2020, as described in our report. A summary of CBP's responses to the recommendations and our analysis follows.

CBP Response to Recommendation 1: Concur. The LESC will modify FACTS with dropdown selection criteria to identify and record the physical location, street address, and specific location within the facility for each stored firearm. Estimated Completion Date (ECD): May 31, 2024.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until CBP provides documentation to show that the LESC has modified FACTS to identify and record the physical location, street address, and specific location within the facility for each stored firearm.

CBP Response to Recommendation 2: Concur. The LESC will modify FACTS to add a list of explanatory dropdowns in the quarterly ammunition inventory. Once complete, unique scenarios will be captured by selecting "Other/Contact System Administrator," which will provide the user a pop-up guidance message to prevent users from submitting the quarterly inventory until the matter is resolved with the system administrator. Free text comment boxes will also be



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required and will be modified to prevent the submission of periods or blanks.
ECD: December 29, 2023.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until CBP provides documentation to show improvements to the ammunition inventory process by ensuring that it reflects or captures differences and explanations between stored amounts and amounts listed in FACTS.

CBP Response to Recommendation 3: Concur. The LESC will modify FACTS so that the system notifies the responsible official and co-authority when virtual vaults are forced into a non-inventoried status 15 days before the end of each quarter. When a vault enters this status, the ability to enter qualifications or ammunition use will be locked until the vault is inventoried.
ECD: December 29, 2023.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until CBP provides documentation to show it has developed and implemented a process to ensure all quarterly ammunition inventories are completed.

CBP Response to Recommendation 4: Concur. The LESC will modify FACTS to delineate ammunition used for qualification/training and ammunition issued for proficiency. Specifically, the qualification module will be adjusted to allow firearms instructors to enter ammunition that was used for qualification/training and ammunition issued for proficiency in one step. The ammunition usage section will also be modified to allow separate entries for training and proficiency. ECD: December 29, 2023.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until CBP provides documentation to show it has developed and implemented a process to track proficiency ammunition issued to officers.

CBP Response to Recommendation 5: Concur. The LESC will modify FACTS to add a dropdown for lost or stolen ammunition. In addition, the LESC will update the CBP memorandum, *Tracking Ammunition in FACTS*, dated January 18, 2017, to establish conditions that all ammunition received, used, and transferred must be captured in FACTS, and that a loss of 500 rounds or more is reportable. ECD: December 29, 2023.

OIG Analysis: We consider these actions responsive to the recommendation, which is open and resolved. The recommendation will remain open until CBP



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provides documentation to show it has developed and implemented a process to track lost or stolen ammunition, including specifying reporting thresholds.

CBP Response to Recommendation 6: Non-concur. According to CBP, the recommendation had no regulatory foundation and was not required by DHS, the Interagency Security Committee, or CBP policies. CBP also asserted that the security handbook does not specifically require placement of VSS cameras on the interior or exterior of storage areas. Without an overarching policy requiring this action, CBP believes that it is not feasible to use the Self-Inspection Program in this instance because a CBP Self-Inspection Program worksheet must tie directly to approved policy. Although CBP acknowledges the recommendation's intent to add another level of protection by expanding the capability of the VSS to monitor ammunition storage and handling, doing so would exceed current policy. As such, CBP OPR's Security Management Division will evaluate the feasibility of additional monitoring in future CBP policy and will also consider additional solutions that address the recommendation's intent of ensuring accountability for weapons and ammunition. ECD: June 28, 2024.

OIG Analysis: We do not consider CBP's actions responsive to the recommendation, which is open and unresolved. CBP claims the security handbook does not specifically require placement of VSS cameras on the interior or exterior of storage areas. However, the security handbook specifically states:

Provide video surveillance for the exterior entrance, issue ports, and the interior of the armory. At a minimum, the system must be able to recognize and monitor persons accessing the room.

Further, the security handbook states that in addition to Interagency Security Committee mandated areas, OPR/Security Management Division requires VSS access point monitoring for controlled areas, including weapons storage rooms. CBP's response did not address these requirements. The recommendation will remain open and unresolved until CBP develops and implements, through CBP's Self-Inspection Program, a process to periodically inspect and verify the position and functionality of VSS monitoring firearm and ammunition storage areas.

CBP Response to Recommendation 7: Non-concur. According to CBP, the recommendation has no regulatory foundation and the design of the VSS will vary depending on the objective of the surveillance, environment, facility type, and end-user requirements. The facility risk level determines VSS monitoring and recording standards, security control center integration, and VSS surveillance advisory messaging and signage. CBP claims that the security



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handbook does not specifically require placement of VSS cameras on the interior or exterior of storage areas. The suggested additional level of protection for ammunition storage and handling, including expanding the capability of the VSS, exceeds current policy. CBP OPR's Security Management Division will evaluate the feasibility of additional monitoring in future CBP policy and will also consider additional solutions that address the recommendation's intent of ensuring accountability for weapons and ammunition. Further, CBP OPR's Security Management Division has reviewed and confirmed that all 11 locations identified in DHS OIG's report have current facility risk assessments. ECD: June 28, 2024.

OIG Analysis: We do not consider CBP's actions responsive to the recommendation, which is open and unresolved. CBP claims the security handbook does not specifically require placement of VSS cameras on the interior or exterior of storage areas. However, the security handbook specifically states:

Provide video surveillance for the exterior entrance, issue ports, and the interior of the armory. At a minimum, the system must be able to recognize and monitor persons accessing the room.

Further, the security handbook states that in addition to Interagency Security Committee mandated areas, OPR/Security Management Division requires VSS access point monitoring for controlled areas, including weapons storage rooms. CBP's response did not address the above requirements. The recommendation will remain open and unresolved until CBP develops and implements a corrective action plan to ensure firearms and ammunition VSS are installed in required areas, functioning, and correctly positioned at the 11 locations with issues identified in this report.



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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*.

Our objective was to determine the extent to which CBP ensures the accountability of firearms and ammunition. The scope of our audit included CBP and its major law enforcement sub-components that possess firearms and ammunition, including the LESC, OPR, OFO, USBP, and AMO. We limited our audit scope to the associated records, reports, and physical inventories for CBP firearms and ammunition. To answer our audit objective, we reviewed applicable DHS and CBP criteria, including policies, directives, memorandums, and FACTS user guides. We reviewed CBP documentation maintained in FACTS, including firearm and ammunition on-hand data and lost/stolen firearm data. Our review of ammunition included lethal ammunition recorded in FACTS and did not include non-lethal or less-lethal types of ammunition. We also reviewed prior DHS OIG and external reports.

We interviewed CBP officials from the LESC, MID, USBP, OFO, AMO, and OPR. We also interviewed DHS Office of the Chief Readiness Support Officer personnel from the Mobile Assets and Personal Property office. We reviewed safeguarding practices and controls at CBP locations for firearms and ammunition held in storage but did not specifically assess to what extent each individual officer safeguards their assigned firearms on and off duty. We conducted site visits to inventory physical assets during FY 2022 and reviewed historical data applicable to FYs 2019-2022, as indicated in the body of the report.

We conducted fieldwork at the following locations in Buffalo, New York; El Paso, Texas; and Miami, Florida:

- OPR IOD El Paso Field Office SAC
- USBP EPT El Paso Station
- OFO ELP El Paso Passenger Inspection Division
- AMO El Paso Air Branch
- OPR IOD Buffalo RAC
- OFO BUF Buffalo Inspection Division
- USBP BUF Niagara Falls Station
- AMO Great Lakes/Buffalo Marine Unit
- USBP MIP Dania Beach Station
- OFO MIA Miami Seaport Area/Airport Narcotics Division
- AMO Miami Air and Marine Branch



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- OPR IOD Miami Field Office

We also conducted limited procedures to plan for fieldwork testing at one site in the OFO Baltimore-Philadelphia Commercial Division. This location was selected due to the close geographical location to DHS OIG staff, which saved potential travel costs and time in conducting planning procedures.

During our fieldwork testing at the OFO MIA Miami Airport Narcotics Division, CBP officers in the area experienced an emergency. We were unable to verify ammunition stored in a CBP van that was located at the scene of the emergency. CBP considers the van to be an extension of the physical ammunition vault. As a result, we were unable to perform planned procedures to verify the total amount of ammunition at this location. This site stored eight different types of ammunition. We verified four types of ammunition with no discrepancies, which totaled 308,750 rounds. We verified four separate types of ammunition totaling 1,597,530 rounds, with a discrepancy of 15,544 rounds. We were unable to verify if the discrepancies were associated with ammunition stored in the CBP van. We assess the impact of the scope limitation to not be significant to the audit findings and conclusions. This site was 1 of 12 sites where the team performed testing. We believe that the evidence obtained through other site visits and other audit procedures, as described in this appendix and throughout the body of the report, provides a reasonable basis for our findings and conclusions based upon our audit objectives.

During our site visits, we observed firearm and ammunition storage areas and identified if required video surveillance systems were installed and functioning. We observed the video feed on site or, in limited instances, received a photograph of the video feed if the camera could not be accessed during our site visit. We reviewed CBP risk assessments completed for the sites visited to identify if video surveillance issues related to firearms and ammunition storage areas had been previously identified. We did not assess whether the risk assessments included all required elements.

During our site visits, we conducted interviews with local CBP personnel including firearms instructors, supervisors, and officers. We compared actual on-hand ammunition and unissued firearms held in storage to the data shown in FACTS and conducted walkthroughs of firearms and ammunition storage areas. We focused our firearms inventories on unissued firearms held in storage. However, we verified any firearms stored on site that were readily available to the data contained in FACTS, including some assigned rifles, shotguns, and other firearms. If FACTS listed a firearm as unissued and held in storage, but it was not available during our testing, we obtained applicable evidence to determine existence and CBP possession of the firearm. For



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example, we obtained photographs of the serial numbers for these firearms after our site visit and reviewed documentation showing the weapons had been checked out for use by a CBP officer during a shift. In total, we physically verified 1,012 firearms during our site visit testing and received acceptable documentation to support the existence of 20 firearms.

We judgmentally selected locations for site visit testing. We based selections on geographical areas that would provide efficiencies in conducting site visits, such as multiple CBP sub-components in the same geographical area. We also considered firearm and ammunition volume at each location, areas on both the northern and Southwest borders, and a location with a seaport. The results of the site visit testing at 12 locations cannot be generalized to all CBP locations. However, we believe that the evidence gathered during the audit in aggregate provides a reasonable basis for our findings and conclusions.

To test data accuracy and that CBP was in possession of all firearms, we used IDEA data analysis software to draw a statistically random sample of all CBP firearms. Given a population of 126,750 firearms as of August 1, 2022, the statistically valid sample size based on 95 percent confidence level, 5 percent sampling error, and 50 percent population proportion was 383. We requested a time-stamped photograph of the firearm be provided for each selected firearm. We then reviewed the photographs and verified the firearm type, serial number, and provider of the photograph.

CBP provided data extracts and screenshots from FACTS, which contained accountability and life cycle information for firearms and ammunition. To assess the reliability of FACTS data, we conducted interviews and walkthroughs of the system with CBP subject matter experts, who demonstrated the process and controls for inventorying and accounting for firearms and ammunition and the data fields available when running queries from the system. We reviewed CBP policies, procedures, and FACTS user guides. We reviewed inventory reports and lost and stolen firearm documentation stored in FACTS.

We also conducted walkthroughs of the quarterly inventory process for ammunition during site visits. To test for data accuracy and existence, we verified data recorded for firearms and ammunition matched the underlying physical assets during site visits and our statistical sample of 383 firearms. To test for completeness, we verified all firearms and ammunition stored during our site visits were recorded in FACTS and reviewed data sets for missing fields and information. Although information system control deficiencies were identified, as described in the body of the report, we determined the data from FACTS was sufficiently reliable for the purposes of this audit.



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In planning and performing our audit, we identified the internal control components and underlying internal control principles significant to the audit objective. All components were significant, including the control environment, risk assessment, control activities, information and communication, and monitoring. We assessed internal controls surrounding CBP's accountability of ammunition and firearms. We identified internal control deficiencies, including information system control deficiencies, that could adversely affect CBP's ability to accurately track firearms and ammunition, as identified in the body of the report. However, because we limited our review to these internal controls, our work may not have disclosed all internal control deficiencies that may have existed at the time of our audit.

We conducted this performance audit between June 2022 and April 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 upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

DHS OIG's Access to DHS Information

CBP denied our request for direct, read-only access to FACTS. According to the Director of Policy, Force Review, and Compliance, LESC, FACTS does not have the capability to provide non-CBP personnel read-only access to the back-end database or reporting tools. As an alternative, CBP provided data extracts and screenshots from FACTS, which we validated through alternate methods, as noted above.



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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**

September 21, 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

X

Signed by: HENRY A MOAK JR

9/21/2023

SUBJECT: Management Response to Draft Report: “CBP Accounted for Its Firearms but Did Not Always Account for Ammunition or Monitor Storage Facilities” (Project No. 22-048-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 remains committed to optimizing support for our mission operations by improving controls and oversight mechanisms to ensure accountability of firearms and ammunition. This includes completing required facility risk assessments in accordance with DHS and CBP policies.¹ The OIG’s recommendations on increased inspections and installation of video surveillance systems (VSS), which are not based on a violation of policy, could be considered a best practice that CBP will consider incorporating in its future policy issuances.

It is important to note that Interagency Security Committee (ISC), Department of Homeland Security (DHS), and CBP policies do not require annual recertification of VSS equipment. Instead, these policies require that CBP use the Risk Management Process (RMP), which is a holistic risk management strategy that addresses the security controls needed to defend an asset against the threat severity level. The threat severity level for each facility determines how often a risk assessment is required (e.g., every three or five years). CBP’s Office of Professional Responsibility (OPR) Security Management Division (SMD) completes relevant facility risk assessments in accordance with these policies¹.

¹ 2021 Edition – The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard (RMP); and DHS Instruction Manual 121-01-010-01, Department of Homeland Security, Physical Security, Revision #01, July 2014, established a department-wide security program reflecting the security standards established by the ISC consistent with Executive Order 12977; and as amended by Executive Order 13286 CBP Physical Security Handbook, HB 1400-02C, Revision 2.0, September 2022.



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Further, CBP leadership is concerned with the OIG's assertion that CBP denied the auditors' request for direct, read-only access to the Firearms, Armor, Credentials Tracking System (FACTS). This assertion does not give readers of the report the full context that CBP's FACTS system does not even have the capability to provide non-CBP personnel read-only access to the back-end database or reporting tools. Nor does the OIG's draft report acknowledge the efforts to which CBP ensured that the OIG received accurate, appropriate, and timely information. For example, CBP's Law Enforcement Safety and Compliance Directorate's (LESC) FACTS program managers not only provided data extracts and screen shots, but collaborated with the OIG to provide requested information, as well as subject matter expertise to answer questions on the data provided to the OIG.

The draft report contained seven recommendations, including five with which CBP concurs (Recommendations 1, 2, 3, 4, and 5) and two with which CBP non-concurs (Recommendations 6 and 7). Enclosed find our detailed response to each recommendation. CBP previously submitted technical comments addressing several accuracy, contextual, 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 22-048-AUD-CBP**

OIG recommended that the Director, LESC:

Recommendation 1: Implement a process to ensure recordation, for each stored firearm, of the physical location, including street address, and specific location within the facility, in the Firearms, Armor, Credentials Tracking System.

Response: Concur. The LESC will modify FACTS with drop-down selection criteria to identify and record the physical location, street address, and specific location within the facility for each stored firearm. Estimated Completion Date (ECD): May 31, 2024.

Recommendation 2: Improve the quarterly ammunition inventory process by ensuring that it reflects or captures differences and explanations between stored amounts and amounts listed in the Firearms, Armor, and Credentials Tracking System.

Response: Concur. The LESC will modify FACTS to add a list of explanatory dropdowns in the quarterly ammunition inventory. Once complete, unique scenarios will be captured by selecting "Other/Contact System Administrator," which will provide the user a pop-up guidance message and prevent them from submitting the quarterly inventory until the matter is resolved with the system administrator. Free text comment boxes will also be required and will be modified to prevent the submission of periods or blanks. ECD: December 29, 2023.

Recommendation 3: Develop and implement a process to ensure all quarterly ammunition inventories are completed.

Response: Concur. The LESC will modify FACTS so that the system notifies the Responsible Official and Co-Authority when virtual vaults are forced into a non-inventoried status fifteen days prior to the end of each quarter. When a vault enters this status, the ability to enter qualifications or ammunition usage will be locked until the vault is inventoried. ECD: December 29, 2023.

Recommendation 4: Develop and implement a process to track proficiency ammunition issued to officers.

Response: Concur. The LESC will modify FACTS to delineate ammunition used for qualification/training and ammunition issued for proficiency. Specifically, the qualification module will be adjusted to allow firearms instructors to enter ammunition that was used for qualification/training and ammunition issued for proficiency in one



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step. The ammunition usage section will also be modified to allow separate entries for training and proficiency. ECD: December 29, 2023.

Recommendation 5: Develop and implement a process to track lost or stolen ammunition, including specifying reporting thresholds.

Response: Concur. LESC will modify FACTS to add a dropdown for lost or stolen ammunition. In addition, LESC will update the CBP memorandum “Tracking Ammunition in FACTS,” (dated January 18, 2017), to establish conditions that all ammunition received, used, and transferred must be captured in FACTS; and that a loss of 500 rounds or more is reportable. ECD: December 29, 2023.

OIG recommended that the Assistant Commissioner, Office of Professional Responsibility, in coordination with the Director, Management Inspections Division:

Recommendation 6: Develop and implement, through CBP’s Self-Inspection Program, a process to periodically inspect and verify the position and functionality of video surveillance systems monitoring firearm and ammunition storage areas.

Response: Non-concur. CBP understands the serious nature of the OIG’s review and importance of accounting for all firearms and ammunition. CBP facility risk assessments are current. CBP remains committed to completing required facility risk assessments in accordance with DHS and CBP policies². However, it is important to clarify that this recommendation has no regulatory foundation, as neither the DHS, ISC, or CBP policy requires annual inspection or recertification of VSS equipment. Since there is no overarching policy requiring this action and a CBP Self-Inspection Program (SIP) worksheet must tie directly to approved policy, utilizing SIP is not feasible in this instance because it cannot be used to determine compliance or non-compliance with policy. In addition, by only looking at a single provision regarding closed-circuit television coverage, this recommendation does not provide a wholistic risk mitigation strategy as the ISC RMP requires, which as the ISC security standard currently in place, underpins both DHS and CBP policy.

The CBP Physical Security Handbook (PSHB)1400-02C,³ explains that the design of the VSS will vary depending on the objective of the surveillance, environment, facility type, and end-user requirements. Based on the facility security level (FSL), VSS countermeasures vary from “No special measures required” (FSL Level 1) to “Provide

² 2021 Edition – The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard (RMP); and DHS Instruction Manual 121-01-010-01, Department of Homeland Security, Physical Security, Revision #01, July 2014, established a department-wide security program reflecting the security standards established by the ISC consistent with Executive Order 12977; and as amended by Executive Order 13286 CBP Physical Security Handbook, HB 1400-02C, Revision 2.0, September 2022.

³ CBP Physical Security Handbook, HB 1400-02C, Revision 2.0, September 2022 (Chapter 13.1 Security of CBP Weapons and Ammunition)



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VSS coverage of screening checkpoints, pedestrian and vehicle entrances, exits, loading docks, lobbies, facility perimeter, parking areas, sensitive interior areas, stairwells, other potential access points, and potential criminal and terrorist pre-operational surveillance locations.” (FSL Level 5). The facility risk level also determines VSS monitoring and recording standards, security control center integration, and VSS surveillance advisory messaging and signage.

The purpose of this provision in the PSHB is to prevent and detect unauthorized entry into and around storage areas, and the PSHB does not specifically require placement of VSS cameras on the interior or exterior of the storage areas. Although CBP acknowledges the intent to adding another level of protection when via expanding the capability of the VSS system for ammunition storage and handling, this would exceed current policy. As such, CBP OPR SMD will evaluate this as a potential best practice to determine the feasibility of incorporating in future CBP policy, as well as the viability of additional solutions that meet the OIG’s intent of ensuring accountability for weapons and ammunition. ECD: June 28, 2024.

OIG recommended that the Commissioner of CBP:

Recommendation 7: Develop and implement a corrective action plan to ensure firearms and ammunition video surveillance systems are installed in required areas, functioning, and correctly positioned at the 11 locations with issues identified in this report.

Response: Non-concur. As noted above, CBP understands the serious nature of the OIG’s review and adheres to, and is current with, our policy of completing a thorough facility risk assessment that requires an onsite inspection, and this recommendation also has no regulatory foundation. Specifically, the PSHB explains that the design of the VSS will vary depending on the objective of the surveillance, environment, facility type, and end-user requirements. Based on the FSL, VSS countermeasures vary from FSL Level 1 to FSL Level 5, and the facility risk level also determines VSS monitoring and recording standards, security control center integration, and VSS surveillance advisory messaging and signage. As previously noted, the purpose of this provision in the PSHB is to prevent and detect unauthorized entry into and around storage areas, and the PSHB does not specifically require placement of VSS cameras on the interior or exterior of the storage areas.

As the suggested additional level of protection for ammunition storage and handling including expanding the capability of the VSS system exceeds current policy, however, CBP OPR SMD will evaluate this as a potential best practice to determine the feasibility of incorporating in future CBP policy, as well as the viability of additional solutions that meet the OIG’s intent of ensuring accountability for weapons and ammunition.



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Further, CBP OPR SMD has reviewed and confirmed that all 11 locations identified in the OIG's report have current facility risk assessments. ECD: June 28, 2024.



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Appendix C
Summary of CBP’s Firearm and Ammunition Storage Video Surveillance Risk Assessment and DHS OIG Observations

Location	Date of Last CBP Risk Assessment	Summary of CBP Risk Assessment Findings Related to Firearms and Ammunition Surveillance	No Exterior Camera**	No Interior Camera**	Functionality and Position Issues**
OPR IOD Miami Field Office	1/29/2018	N/A*	-	X	X
OPR IOD Buffalo RAC	5/3/2019	N/A*	-	X	-
USBP BUF Niagara Falls Station	10/28/2019	Video surveillance coverage, including for weapons storage rooms, is inadequate.	X	X	-
OFO BUF Buffalo Inspections Division	4/7/2020	N/A*	-	X	X
USBP EPT El Paso Station	12/8/2020	N/A*	-	X	X
AMO Great Lakes/Buffalo Marine Unit	4/6/2021	N/A*	-	-	-
AMO El Paso Air Branch	10/27/2021	Video surveillance lacks full covered of weapon storage.	X	X	-
OPR IOD El Paso Field Office SAC	1/11/2022	N/A*	-	X	-
USBP MIP Dania Beach Station	4/12/2022	N/A*	X	-	-
OFO MIA Miami Seaport Area	7/13/2022	N/A*	X	X	-
AMO Miami Air and Marine Branch	10/26/2022	There are no cameras in the ammunition storage room.	-	X	-
OFO ELP El Paso Passenger Inspection Division	10/31/2022	N/A*	X	X	-

Source: DHS OIG observations and analysis of CBP data

X = Indicates that an issue was identified

*No findings from the CBP risk assessments were specifically related to firearms and ammunition storage video surveillance

**DHS OIG observations



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Appendix D
Report Distribution

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