DHS Training Needs for Hiring 15,000 Border Patrol Agents and Immigration Officers

November 26, 2018
OIG-19-07
November 26, 2018

Why We Did This Audit

On January 25, 2017, the President issued two Executive Orders directing the Department of Homeland Security to hire an additional 15,000 law enforcement officers. We conducted this audit to determine whether the Department and its components — specifically FLETC, USBP, and ICE — have the training strategies and capabilities in place to train 15,000 new agents and officers.

What We Found

The Federal Law Enforcement Training Centers (FLETC), U.S. Border Patrol (USBP), and U.S. Immigration and Customs Enforcement (ICE) have each developed hiring surge training plans and strategies. However, we found challenges exist due to uncertain funding commitments and overextended throughput capacity, particularly as they affect training resource projections and expansion capabilities to meet hiring goals. We also identified crosscutting concerns with current training conditions that will likely become more serious with increased demand.

Additionally, FLETC, USBP, and ICE each apply a different approach to managing and implementing their instructor programs. This impacts the effectiveness and cost of instructors, as well as the application of best practices. Furthermore, in the absence of any instructor rotation policy, ICE Homeland Security Investigations relies heavily on temporary duty instructors with abbreviated assignments. This approach is not only expensive but also ineffective in terms of ensuring consistent, safe instruction.

If these combined challenges and conditions continue, they may impede consistency and lead to a degradation in training and standards. As a result, trainees will be less prepared for their assigned field environment, potentially impeding mission achievability and increasing safety risk to themselves, other law enforcement officers, and anyone within their enforcement authority. Coordination among FLETC, USBP, and ICE is critical to the effective expansion of capabilities for law enforcement training that meets the Executive Orders’ requirements, but at the same time works within the limits of the funds granted.

What We Recommend

We made three recommendations to improve training and coordination within the Department.

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

DHS Response

The Department concurred with the three recommendations.
November 26, 2018

MEMORANDUM FOR:  The Honorable Claire M. Grady
                      Acting Deputy Secretary
                      The Honorable Thomas J. Walters
                      Director
                      Federal Law Enforcement Training Centers

FROM: John V. Kelly
      Senior Official Performing the Duties of the Inspector
      General

SUBJECT:  

DHS Training Needs for Hiring 15,000 Border Patrol
Agents and Immigration Officers

Attached for your action is our final report, *DHS Training Needs for Hiring 15,000 Border Patrol Agents and Immigration Officers*. We incorporated the formal comments from the Department in the final report.

The report contains three recommendations aimed at improving Federal law enforcement officer training. Your office concurred with the three recommendations. Based on information provided in your response to the draft report, we consider the recommendations 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.

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 call me with any questions, or your staff may contact Sondra McCauley, Assistant Inspector General for Audits, at (202) 981-6000.
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Abbreviations

CBP ......................................................... Customs and Border Protection
EO ........................................................ Executive Orders
ERO ..................................................... Enforcement and Removal Operations
FLETC .................................................. Federal Law Enforcement Training Centers
GAO ..................................................... Government Accountability Office
HSI ...................................................... Homeland Security Investigations
ICE ..................................................... Immigration and Customs Enforcement
USBP .................................................. United States Border Patrol
OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Background

On January 25, 2017, the President issued two Executive Orders (EO) directing the Department of Homeland Security to hire an additional 5,000 Border Patrol Agents and 10,000 Immigration Officers. On February 20, 2017, the DHS Secretary issued implementing memorandums in support of the EOs, directing U.S. Border Patrol (USBP) and U.S. Immigration and Customs Enforcement (ICE) to ensure consistency in training and standards while taking action immediately to begin the hiring surge.

As set forth in Special Report: Challenges Facing DHS in Its Attempt to Hire 15,000 Border Patrol Agents and Immigration Officers, OIG-17-98-SR (July 27, 2017), proper workforce planning is critical to ensure correct staffing levels, ratios, and placements; and to guide targeted recruitment campaigns. USBP’s hiring plan runs from fiscal years 2019–25. During this period, USBP plans to hire 1,050 agents per year, which incorporates a 15 percent training academy attrition rate. However, this projection does not take into account the 4.6 percent staff attrition rate U.S. Customs and Border Protection (CBP) reported in FY 2017 or its authorized staffing level shortages for Border Patrol Agents. ICE provided several hiring plans, including a 4-year span for FYs 2018–21, in which they planned to hire 8,500 Enforcement and Removal Operations (ERO) officers and 1,500 Homeland Security Investigations (HSI) agents. ICE did not incorporate staff or academy attrition in its hiring projections. For FY 2017, ICE reported a staff attrition rate of approximately 4 percent for both ERO and HSI, and an academy attrition rate of 12.2 and 5.9 percent for ERO and HSI, respectively. ICE officials last reported in January 2018 that they are still in the process of revising the timeframe in which they will “onboard” 10,000 new law enforcement officers (appendix C contains USBP and ICE hiring projections, anticipated attrition, and recruitment efforts).

Between July 2017 and March 2018, we reviewed and analyzed the EOs, DHS’s implementation memorandums concerning the EOs, and respective agency hiring plans and training strategies. We also interviewed agency personnel and training staff at the Federal Bureau of Investigation and U.S. Marshals Service, as well as visited DHS training sites. The purpose of this review was to determine whether DHS, through FLETC, USBP, and ICE, developed training

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2 This attrition rate takes into account training injuries and trainees given a second chance to graduate from the training program.
3 USBP and ICE’s hiring projections are subject to change based on fluctuations in demand, attrition, and available funding.
strategies and identified resources necessary to train 15,000 new agents and officers.\(^4\)

USBP and ICE trainees attend basic training at each component’s academy within the Federal Law Enforcement Training Centers (FLETC). This necessitates close coordination among FLETC, USBP, and ICE to ensure the availability of instructors, training venues and housing, and other important resources. Each component performs different but complementary training duties and responsibilities.

FLETC provides basic, advanced, specialized, and in-service requalification training for personnel from more than 90 Federal law enforcement agencies\(^5\) as well as state, local, tribal, and international law enforcement agencies. According to FLETC’s “surge implementation plan,” FLETC is anticipating an increase in training demand over the next 5 years because of the Department hiring surge, as well as other Partner Organizations’ increase in hiring over the next few years. The training covers areas that include use of force, active threat response, defensive tactics, firearms, terrorism, first response, interviewing and investigations, and constitutional law; each of which requires availability of a specific set of resources. FLETC owns and operates three residential centers in the United States (Artesia, NM; Charleston, SC; and Glynco, GA), and one non-residential center (Cheltenham, MD).

FLETC and its Partner Organizations (including USBP and ICE) use Memorandums of Understanding to outline training agreements, protocols, and procedures related to staffing and use of facilities. For example, FLETC and its Partner Organizations typically split training instructor costs and requirements, also known as the FLETC “pro-rata” share. Agencies provide a “pro-rata” share for all of their requested training in a given year with the following options:

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\(^4\) The audit scope was limited to basic training for newly hired DHS agents and officers. We recognize that DHS agents and officers receive continual on-the-job, advanced, and leadership training throughout their career. This report does not address the potential challenges DHS may face related to providing these types of trainings to their workforce while at the same time conducting basic training for new hires.

\(^5\) There are currently 13 Partner Organizations within DHS, such as ICE, USBP, U.S. Secret Service, Transportation Security Administration, and Federal Protective Service.
1. assign instructors to FLETC (ideally for a period of 3 to 5 years);
2. provide funding to FLETC to hire instructors on the agency’s behalf (the FY 2018 rate is $112,000 per instructor for salary and benefits); or
3. implement a combination of options 1 and 2.

Student costs for training at FLETC include tuition, meals, lodging, instructors, and miscellaneous expenses.

USBP is the mobile, uniformed law enforcement arm of CBP responsible for securing U.S. borders between ports of entry. CBP’s Office of Training and Development oversees and operates training at the Border Patrol Academy.

Border Patrol Agent trainees attend a 117-day USBP integrated basic training program, located at FLETC in Artesia, NM, that USBP and FLETC instructors administer and operate. Prior to issuance of the 2017 EOs, USBP spent 3 years (2013–16) revising its training program and has no planned modifications to address the hiring surge. In FY 2017, 262 students graduated from USBP’s training program, and FLETC projects 648 to graduate in FY 2018.

ICE, through its ERO directorate, identifies and apprehends removable aliens; detains individuals when necessary; and removes illegal aliens from the United States. ERO’s Basic Immigration Enforcement Training Program, conducted at FLETC in Glynco, GA, spans 20 weeks and includes Spanish language training that ERO and FLETC instructors administer and operate. In FY 2017, 134 students graduated from ICE ERO’s training program, and FLETC projects 195 to graduate in FY 2018.

ICE’s HSI directorate is responsible for investigating a wide range of domestic and international activities arising from the illegal movement of people and goods into, within, and out of the United States. HSI’s Basic Training Academy is a two-phase program located at FLETC in Glynco, GA. The first phase is a 56-day Criminal Investigator Training Program that FLETC instructors administer and operate. The second phase is a 75-day HSI Special Agent Training Program that HSI and FLETC instructors administer and operate. In FY 2017, 186 students graduated from ICE HSI’s training programs, and FLETC projects 386 to graduate in FY 2018.

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6 FLETC instructors administering and operating the Criminal Investigator Training Program are instructors employed by FLETC as well as criminal investigators and officers detailed to FLETC by Partner Organizations.
ICE is in the process of restructuring its training program as outlined in Management Alert — ICE’s Training Model Needs Further Evaluation (OIG-18-42, January 2018), and will return to separate training programs led by ERO and HSI, respectively, rather than a centralized approach. To accommodate the anticipated increase of trainees, ERO and HSI are preparing to deliver training in two working shifts, along with 6-day workweeks. Furthermore, ICE is working with FLETC to review its training programs and identify efficiencies in order to reduce the length of time required for training, where possible, without diminishing value.

### Results of Audit

FLETC, USBP, and ICE have each developed hiring surge training plans and strategies. However, the hiring surge has not begun and FLETC’s throughput capacity is already overextended. In fact, we found challenges exist due to uncertain funding commitments, particularly as they affect training resource projections and expansion capabilities to meet hiring goals. We also identified crosscutting concerns with current training conditions that will likely become more serious with increased demand. As the Department prepares to hire and train 15,000 law enforcement officers, it is already struggling to:

- improve training venues and workaround scenarios to avoid degradation of training at FLETC in Artesia, NM; and
- ensure the availability of preferred training venues and housing at FLETC in Glynco, GA.

Additionally, FLETC, USBP, and ICE each apply a different approach to managing and implementing their instructor programs. This influences the effectiveness and cost of instructors, as well as the application of best practices. Furthermore, in the absence of any instructor rotation policy, HSI relies heavily on temporary duty instructors with abbreviated assignments. This approach is not only expensive but also ineffective in terms of ensuring consistent, safe instruction.

If these combined challenges and conditions continue, they may impede consistency and lead to a degradation in training and standards. As a result, trainees will be less prepared for their assigned field environments, potentially impeding mission achievability and increasing safety risk to themselves, other law enforcement officers, and anyone within their enforcement authority. Coordination among FLETC, USBP, and ICE is critical to the effective

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**ICE Training Academy Mission:**

The mission of the ICE Academy at Glynco is to develop and deliver professional training programs in order to provide ICE employees with the knowledge, skills, and abilities essential to ICE’s national security and law enforcement mission.
expansion of capabilities for law enforcement training that meets the EOs’ requirements but, at the same time, has to work within the limits of the funds granted.

**Uncertain Funding Limits Implementation of Plans and Strategies**

Following issuance of the EOs in January 2017, FLETC, USBP, and ICE developed training plans and strategies and assessed their capability to meet hiring surge projections. In doing so, each component projected resource requirements such as the number and associated cost of instructors, support staff, and training venues and facilities. Plans and strategies also considered:

- use of alternate locations,
- efficiencies related to scheduling and curriculum, and
- optimal class size.

FLETC, USBP, and ICE developed plans and strategies to maximize resources. However, the uncertainty related to funding limits their implementation. As a result, the Department pushed FY 2017 and 2018 hiring and training projections to FY 2019 and beyond.

Funding limitations will delay efforts to improve and construct necessary training venues and facilities. For example, Congress did not approve the Department’s FY 2017 request of $63 million for FLETC venues and facilities to support USBP and ICE law enforcement officer training. Consequently, FLETC requested $101.8 million in funding for training venues and facilities for FY 2019. According to the funding justification, this request includes modular classrooms, offices, dormitories, skid ranges, a transportation checkpoint, a processing center, a non-lethal training ammunition shoot house, a tactical training awareness center, and tactical training venues. Even if FLETC receives the requested funding in FY 2019, there are still significant lead times associated with the facilities that the components will have to consider. According to a FLETC official, it will take approximately 11 months to build the modular dormitories, consisting of approximately 4 months for design and 7 months for construction. That projected timeframe can be impacted by numerous factors such as weather, market conditions (e.g., supply/demand of available labor, materials, etc.), and the acquisition strategy to be used for the construction project.

Delays in funding will also have a domino effect on the respective component’s ability to obtain timely resources and extend overall lead times for instructor availability. Increased student throughput will further exacerbate existing instructor availability challenges. HSI instructors indicated there are instances in which they do not have the required number of instructors for a course,
forcing instructors to break the training apart into groups. For example, HSI instructors stated that they might split the HSI Defensive Tactics class of 24 students into two groups. Due to the limited number of available instructors, and to ensure safety, only half the class will train at a time, reducing their training time.

**Existing Training Venues Need Improvement**

USBP faces challenges with training venues as they exist at FLETC in Artesia, NM. According to USBP officials, USBP revised its training curriculum based on current research. In doing so, USBP identified areas to enhance training and emphasize performance-based scenarios. USBP also conceptualized improved training venues to align with its revamped curriculum. However, because of lack of funding, CBP has not been able to construct most of the required venues to incorporate curriculum revisions. As a result, USBP Academy instructors stated that they conduct training using “workarounds” that lack performance-based realistic settings.7

USBP officials could benefit from new or improved, modern training venues, such as the proposed transportation terminal/checkpoint and the VIRTRA 300 judgmental use of force simulator. To date, CBP officials indicated funding has not been provided to support the majority of needed training venue improvements. Without necessary improvements, the quality of instruction will remain below intended levels and not include exposure to authentic environments. As a result, trainees will be less prepared for their assigned field environments, potentially impacting detection of people or items prohibited by law and increasing safety risk to themselves, other law enforcement officers, and anyone within their enforcement authority.

**Ideal Venues versus Current Workarounds**

USBP academy officials identified potential areas in which degradation of training could occur due to the current inadequate training venues. The following section compares two of eight venues in ideal-versus-workaround form.

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7 During interviews, USBP instructors referred to substitute scenarios as “workarounds.” We use the term “workarounds” in our report to denote situations in which instructors are using training equipment that does not replicate the current environments in which agents work.
The Proposed Transportation Terminal/Checkpoint — In designing the checkpoint training, USBP academy officials conceptualized using a modern terminal environment. As outlined in USBP’s training venue improvement presentation, potential benefits of the proposed transportation terminal/checkpoint include:

- settings that provide reality-based training associated with the use of coach-style buses and terminals;
- checkpoint facilities that include secondary inspection lanes for buses and other large conveyances; and
- areas for processing, inspection, and arrest scenarios.

During this audit, USBP used yellow school buses that required trainees to pretend to search imaginary storage compartments and bathrooms. This significantly detracted from the potential training value of using fully equipped coach-style buses. USBP purchased and received two coach-style buses that we observed sitting in a vacant lot at FLETC in Artesia, NM, in August 2017. As of March 2018, a USBP academy official indicated there is a FLETC purchase requisition for the installation of heating and air conditioning units and relocation of the buses. Because the requisition had yet to be funded, the buses remained in the lot, unused for training purposes.

Without a modern terminal environment, trainees must rely on workarounds to substitute for the proposed transportation terminal/checkpoint, preventing exposure to real-life training scenarios. As a result, trainees will be less prepared for duties associated with transportation terminals, potentially impacting safety risk and detection of illegal activity.

The Proposed VIRTRA 300 Judgmental Use of Force Simulator — This venue would provide a multi-dimensional presentation of threats. It was redesigned after USBP agents in the field reported a need for improved preparation for their work environment. As outlined in USBP’s training venue improvement
presentation, potential benefits of the proposed VIRTRA 300 Judgmental Use of Force Simulation include:

- enhanced 300-degree training, providing real-world scenarios from almost any direction — thereby increasing critical thinking and judgment in use of force scenarios;
- programmable scenarios to address targeted problem areas; and
- use of photos from actual patrol areas.

Without this venue and equipment, trainees must rely on a one-dimensional training scenario, which does not expose trainees to enhanced risk mitigation techniques, critical thinking skills, and total situational awareness during use of force exercises. As a result of using the existing firearms simulator, trainees will be less prepared for real-world situations, potentially increasing safety risk based on judgment determinations for use of force.

“\textit{The VIRTRA is already in use in the field for USBP personnel to complete quarterly & semi-annual training. The system at the Border Patrol Academy is not only outdated but also is a system no longer used anywhere else within CBP.”} – CBP Office of Training and Development Official

\textbf{Figure 3. Proposed VIRTRA 300 Simulator} \hspace{1cm} \textbf{Figure 4. Current Training Environment} \\
\textit{Source: USBP Academy} \hspace{1cm} \textit{Source: USBP Academy}

\textbf{Competition for Preferred Training Venues}

USBP and ICE may not always have access to preferred training venues\textsuperscript{8} at FLETC because of high competition with other Partner Organizations. Increased training demands, coupled with insufficient funding to construct new venues, will lead to scheduling challenges and impact the availability of preferred training venues. Prior to the receipt of funding and start of the hiring

\textsuperscript{8} A preferred training venue provides more realistic scenarios in urban and residential settings, including multi-floor, multi-room designs.
surge, training venue capacity at FLETC is already overextended. For example, FLETC officials identified eight training venues and facilities that have already exceeded or will continue to exceed capacity. FLETC noted these venues as having a “need for investment” in order to meet increased training demands. If funded, the hiring surge will stretch FLETC’s training venue capacity limitations even further.

As a result, a FLETC official stated that potential backup venues have been identified to address heightened demand. However, these venues lack variations in structures and features to enable realistic and effective training. For example, the one-level backup venue (as illustrated in figure 6) lacks stairwells, which precludes training on tactics for navigating such settings.

Preferred versus Potential Backup Venue — (Glynco, GA)

![Preferred Venue — Danis City](source:FLETC) ![Backup Venue — Old Navy Housing](source:DHS OIG)

Additionally, these secondary venues may not always facilitate a safe environment for training. For instance, as outlined in our FLETC Warehouse Management Alert, issued in December 2017, USBP’s Border Patrol Academy continued to use a warehouse for training at FLETC in Artesia, NM, even though the warehouse sustained structural damage that posed a potential safety hazard to instructors and trainees.

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9 Management Alert-Safety Issue at FLETC Artesia Warehouse (OIG-18-31, December 2017)
10 After the issuance of the Management Alert, training was moved to a different FLETC warehouse.
Housing Challenges at FLETC in Glynco, GA

Onsite housing has not been available for all trainees in Glynco, GA, due to high demand and property loss from Hurricanes Matthew in 2016 and Irma in 2017. During our review, FLETC was in the process of renovating approximately 123 dormitory rooms that were off-line due to hurricane damage. In FY 2017, FLETC in Glynco, GA, reported it exceeded its onsite lodging capacity of 22,912 students. As a result, FLETC officials reported it had to house students in off-center lodging, transporting 6,413 students up to 74 miles away from the center. In FY 2018, FLETC projects a student population of 33,803, which exceeds its onsite lodging capacity. FLETC projected it will have to house more than 11,000 students in off-center lodging in FY 2018. FLETC primarily contracts with moderate-style hotels, which puts trainees in an unsecure environment and prevents them from having access to the facilities at FLETC in Glynco. Transporting trainees from FLETC to off-center lodging also reduces access to other trainees and limits opportunities to build camaraderie.

In December 2016, the Government Accountability Office (GAO) described Partner Organization interviews on this topic. One partner stated that housing trainees off-site increased their portion of training costs. Another partner suggested that housing trainees off-site may interfere with acclimation to agency culture.

To address capacity limitations and other training challenges, FLETC is in the process of preparing its Strategic Plan for FYs 2019–22. FLETC officials began drafting this plan in October 2017, and anticipated its completion by September 2018. In December 2016, GAO reported on FLETC’s declining resources, noting that, “longer-term strategic planning could help FLETC maintain capacity to accommodate the anticipated increase in demand for law enforcement training in the coming years to avoid any delays for Partner Organizations in hiring or training the new law enforcement officers that they need to achieve their missions.”

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11 On February 9, 2018, Congress approved the Bipartisan Budget Act of 2018, P.L. 115–123, providing $5,000,000 to FLETC for “Procurement, Construction, and Improvement” for necessary expenses related to the consequences of Hurricanes Harvey, Irma, and Maria.

12 Declining Resources: Selected Agencies Took Steps to Minimize Effects on Mission but Opportunities Exist for Additional Action (GAO 17–79; December 2016)
Instructor Programs and Policies Need Improvement

FLETC, USBP, ERO, and HSI each apply a different approach to managing and implementing their instructor programs. This impacts the effectiveness and cost of instructors as well as the application of best practices. Although FLETC, CBP, and ICE ERO have instructor rotation policies, HSI’s lack of policy and heavy reliance on short-term, temporary instructors is both expensive and ineffective for ensuring consistent, safe training. During our review, we identified best practices that could improve overall instruction.

Instructor Designations, Duration, and Related Inefficiencies

To maximize instructor effectiveness and promote fiscal responsibility, FLETC, USBP, ERO, and HSI should determine the optimal duration of instructor assignments by designation (permanent, term, rotational, temporary duty, or temporary-intermittent/while actually employed). In doing so, components should take into account the amount of time it takes for an employee to become a qualified instructor, and how to maximize instructor performance (table 1 shows current instructor designations with average duration by component).

Table 1. Instructor Designations with Average Duration by Component

<table>
<thead>
<tr>
<th>Instructor Designations</th>
<th>FLETC</th>
<th>USBP Academy</th>
<th>ERO Academy</th>
<th>HSI Academy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Instructors</td>
<td>Indefinite duration</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Term Instructors</td>
<td>13 months–4 years</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
<tr>
<td>Rotational Instructors</td>
<td>—</td>
<td>3–5 years*</td>
<td>3–5 years**</td>
<td>3–5 years**</td>
</tr>
<tr>
<td>Temporary Duty Instructors</td>
<td>—</td>
<td>8–11 months or adjunct specific to course length</td>
<td>12 months</td>
<td>4 months</td>
</tr>
<tr>
<td>Temporary Instructors (intermittent/while actually employed)</td>
<td>Not to exceed 1 year (may be extended indefinitely in 1-year increments)</td>
<td>—</td>
<td>—</td>
<td>—</td>
</tr>
</tbody>
</table>

*Currently, USBP does not assign “detailed” instructors to FLETC. Instead, USBP provides instructors internally to its respective training academy for 3- to 5-year rotations.

**ERO and HSI are expected to assign “detailed” instructors (for a 3- to 5-year period) to FLETC as part of their Partner Organization agreements. In addition, ERO assigns instructors internally to its respective training academy for 3- to 5-year rotations. Alternatively, HSI does not have an instructor rotational policy and the duration for internal instructors assigned to its academy is unspecified.

Source: OIG analysis of FLETC, CBP, and ICE data
These instructor designations and durations have different implications for cost and actual instruction. On average, it costs almost double to assign temporary duty instructors for a 3- to 5-year period (given travel and per diem expenses) compared to relocating an instructor, as outlined in table 2.

Table 2. Rotational and Temporary Duty Instructor Costs

<table>
<thead>
<tr>
<th>Rotational Instructors (3- to 5-year rotation)</th>
<th>Temporary Duty Instructors (3- to 5-year period)</th>
</tr>
</thead>
<tbody>
<tr>
<td>$152,000-$197,000</td>
<td>$292,000-$486,000</td>
</tr>
</tbody>
</table>

Source: OIG analysis of CBP and ICE data

Based on these figures, the three components — FLETC, CBP, and ICE — should consider the relative return on investment associated with assigning instructors to FLETC.

HSI Needs an Instructor Rotation Policy

The HSI training academy does not have an instructor rotation policy. To fulfill instruction requirements, HSI relies heavily on temporary duty instructors who rotate through FLETC in Glynco, GA, every 4 months. In FY 2019, it projects needing 176 temporary duty instructors. This approach is ineffective because it does not ensure consistent and safe instruction, and could lead to potential training degradation. Component training officials generally agree it takes a minimum of 6–9 months for instructor qualification, although some training courses require less time. Additionally, it is expensive, as each 4-month rotation costs approximately $32,000 in travel and per diem expenses. As of December 2017, HSI officials indicated they had established a working group to prepare a rotational policy.

Training Academy Best Practices

During this review, we discussed training academy best practices with FLETC, USBP, and ICE officials, as well as officials from the Federal Bureau of Investigation and the U.S. Marshals Service. This resulted in identifying the following best practices:

- Offering incentives to become an instructor, such as promotion to a higher grade level when entering the program, relocation incentives, developmental opportunities, and spousal transfer priority;
- Leveraging subject-matter experts to enhance training modules; and
- Requiring instructors to perform short-term field missions to maintain proficiency and perspectives relevant to current events.
Increased use of these practices may help FLETC, USBP, and ICE secure and retain qualified instructors, and lead to improved training. Adoption of these practices more broadly by DHS components using FLETC would further standardize law enforcement training and promote unity of effort.

**Conclusion**

Prior to the start of the hiring surge, FLETC’s capacity is already overextended. FLETC is not only responsible for accommodating the anticipated Department hiring surge, but also for an expected increase in demand from other Partner Organizations. Despite observing ongoing work in the development of hiring surge training plans and strategies, challenges exist due to uncertain funding commitments and current training conditions. Absent remedial action, these challenges may impede consistency and lead to a degradation in training and standards. As a result, trainees will be less prepared for their assigned field environment, potentially impeding mission achievability and increasing safety risk to themselves, other law enforcement officers, and anyone within their enforcement authority. With the Secretary’s emphasis on retaining the quality of training during the planned hiring surge, it is imperative for the Department to address these concerns. FLETC, USBP, and ICE should improve training and coordination within the Department, which is critical to the effective expansion of capabilities for law enforcement training that meets the EOs’ requirements, but at the same time has to work within the limits of the funds granted.

**Recommendations**

**Recommendation 1:** We recommend the Undersecretary of Management, in collaboration with FLETC, USBP, and ICE, develop and implement a comprehensive plan to:

- identify, prioritize, and complete training venue and facility improvements; and
- identify a strategy to address housing needs in the most cost-efficient manner.

**Recommendation 2:** We recommend the Undersecretary of Management collaborate with officials from across the Department — including, but not limited to, the Office of the Chief Human Capital Officer, FLETC, USBP, and ICE — to develop and implement standards and procedures to address:

- optimal designations (permanent, term, rotational, temporary duty, or temporary-intermittent/while actually employed) and duration for instructors assigned to FLETC and component training academies to maximize efficiency and effectiveness;
• HSI’s need for an established rotation policy; and
• best practices for securing and retaining qualified instructors while ensuring consistent training.

Recommendation 3: We recommend the Director of FLETC convene training officials from USBP, ICE, and other appropriate Partner Organizations department-wide to inform and assist FLETC in its efforts to finalize a Strategic Plan for FYs 2019–22. The group should coordinate to ensure FLETC can accommodate increases in demand and to minimize disruption to law enforcement agency hiring and training plans.

Management Comments and OIG Analysis

The Department concurred with our three recommendations. We included a copy of the Department’s management comments in their entirety in appendix B. We also received technical comments to the draft report and revised the report as appropriate. In the technical comments, the Department provided updates to ICE’s hiring projections and FLETC’s funding requests. We did not include the new information in the final report because these figures were dated after the scope of our fieldwork period. These revised figures would have been used for informational purposes only and did not affect the report’s findings or recommendations. We consider the three recommendations resolved and open until the Department implements the proposed corrective actions. A summary of the Department’s response and our analysis follows.

DHS Response to Recommendation #1: Concur. The Department designated FLETC’s Mission and Readiness Support Directorate to take the lead on implementing this recommendation. Training venue and facility needs and improvement plans have been proposed and submitted through DHS Headquarters for Procurement, Construction, and Improvements funding in FY 2019. FLETC will continue to work with CBP, ICE, and its Partner Organizations to develop training needs for the upcoming 5-year period. FLETC identified short-, mid-, and long-term strategies and accomplishments to address lodging needs in a cost-efficient manner. FLETC developed a comprehensive plan to address this recommendation.

OIG Analysis: We consider these actions responsive to the recommendation, which is resolved and open. We will close this recommendation after we review the Department’s request for FY 2019 funding for training facilities, documentation demonstrating implementation of lodging strategies, and processes for formal collaboration with Partner Organizations related to training needs.
**DHS Response to Recommendation #2:** Concur. The Office of Chief Human Capital Officer will work with components to develop and implement standards to identify the most effective instructor cadre composition for Federal law enforcement training. Additionally, ICE HSI drafted its *2018 HSI Academy, Criminal Investigator, GS1811-Rotation Program* to address instructor and management staffing at the ICE HSI Academy. The policy is in the final deliberative review process within ICE. Finally, the Office of Chief Human Capital Officer agrees they should implement processes for securing and retaining qualified instructors while ensuring consistent training. The Office of Chief Human Capital Officer is working with FLETC to identify best practices for implementation. The overall estimated completion date is September 30, 2019.

**OIG Analysis:** We consider these actions responsive to the recommendation, which is resolved and open. We will close this recommendation after we verify the Department has implemented:

- standards for effective instructor cadre composition;
- a process for securing and retaining qualified instructors to ensure consistent training; and
- the *2018 HSI Academy, Criminal Investigator, GS1811-Rotation Program*.

**DHS Response to Recommendation #3:** Concur. The Department approved FLETC to revise its mission, vision, and value statements, as well as re-align its organizational structure to intentionally place its Partner Organizations and their needs at the epicenter of FLETC’s focus.

As a means to inform and refine FLETC’s strategic vision, the FLETC Director

- hosted Partner Organization Training Executive Forums to discuss key training topic areas;
- conducted “Listening Tours” to hear the insights and concerns of FLETC Partner Organization representatives and FLETC staff members; and
- has begun monthly meetings with FLETC Partner Organization representatives to discuss strategic, operational, and resource issues, and to ensure ongoing collaboration in developing short-, mid-, and long-term plans to address their training needs.

The FLETC Director is nearing completion of FLETC’s strategic goals for 2019-22, which are grounded in the insights and feedback received from Partner Organizations. The FLETC Director is also working with FLETC staff and Partner Organizations to develop FLETC’s strategic objectives. DHS requested this recommendation be resolved and closed as implemented.
OIG Analysis: OIG recognizes that FLETC has taken numerous actions in response to this recommendation. This recommendation is resolved but will remain open until FLETC completes its strategic plan for FYs 2019–22 and provides a copy of the strategic plan and the supporting documentation used for the approved realignment.
Appendix A
Objective, Scope, and Methodology


We conducted this audit to determine whether FLETC, USBP, and ICE have training strategies and capabilities in place to train the 15,000 new agents and officers they are required to hire under Executive Orders (EOs) 13767 and 13768.

To answer our objectives we obtained, reviewed, and analyzed pertinent Federal, Department, and component documents, including:

- The Secretary’s Memorandums, Implementing the President’s Border Security and Immigration Enforcement Improvements Policies and Enforcement of the Immigration Laws to Serve the National Interest issued (February 20, 2017);
- FLETC, USBP, and ICE training and implementation plans and strategies specific to hiring 15,000 new agents and officers;
- CBP’s Hiring Contract;
- FLETC, USBP, and ICE internal Training Directives, Recruitment Strategies and Plans, Standard Operating Procedures, and Guidance;
- Memorandums of Understanding between FLETC, USBP, and ICE; and
- DHS Congressional Budget Justifications, Prior OIG and GAO Reports, Media Articles, and Congressional Testimony.

We interviewed officials from:

- FLETC’s Mission and Readiness Support Directorate, and Chief Financial Officer Directorate; Centralized Training Management Directorate; and Regional and International Training Directorate;

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13 Executive Order 13767 - Border Security and Immigration Enforcement Improvements, January 25, 2017; and Executive Order 13768- Enhancing Public Safety in the Interior of the United States, January 25, 2017
CBP’s Office of Training and Development, Office of Finance, Mission Readiness Operations Directorate, and Advanced Training Center;
ICE’s Office of Training and Tactical Programs, Office of the Chief Financial Officer, Enforcement and Removal Operations Directorate, Homeland Security Investigations Directorate, Management and Administration Directorate, Fort Benning Training Center, Charleston South Carolina Training Center, and the Dallas Texas Training Academy;
the Department’s Office of the Chief Human Capital Officer;
the U.S. Marshals Service’s Training Division; and
the Federal Bureau of Investigation’s Training Division.

Furthermore, we conducted site visits to observe FLETC venues and facilities in Glynco, GA, and Artesia, NM.

We obtained and evaluated data provided by FLETC, USBP, and ICE on projected hiring numbers, student throughput, and training-related funding requests. We reported this information as presented to provide context, but did not use it to support our overall conclusions and recommendations. We also reviewed and validated costs for instructor relocation and temporary duty travel. In addition, we reviewed and evaluated FLETC housing capacity and off-site housing costs, but could not fully validate these figures due to fluctuations in schedules and demand and FLETC’s reliance on obligated funding rather than actual expenditures. Overall, the data included in this report were sufficiently reliable to support our conclusions.

We conducted this performance audit between July 2017 and March 2018 pursuant to the Inspector General Act of 1978, as amended, 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 objective.
Appendix B
DHS Management Comments to the Draft Report

MEMORANDUM FOR: John V. Kelly  
Senior Official Performing the Duties  
of the Inspector General

FROM: Jim H. Crumpacker, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office


Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

DHS remains committed to safeguarding the American people, our homeland, and our values. This includes ensuring that we continue to train our officers and agents with a focus on efficiency, effectiveness, and accountability to achieve the advantages of quality, consistency, and economies of scale in law enforcement training.

The draft report contained three recommendations with which the Department concurs. Attached find our detailed response to each recommendation. Technical comments were previously provided under separate cover.

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.

Attachment
Attachment: Management Response to Recommendations Contained in 17-086-AUD-CBP, FLETC, ICE

The OIG recommended the Under Secretary for Management:

**Recommendation 1:** In collaboration with the Federal Law Enforcement Training Centers (FLETC), U.S. Customs and Border Protection (CBP), and U.S. Immigration and Customs Enforcement (ICE), develop and implement a comprehensive plan to:

- identify, prioritize, and complete training venue and facility improvements; and
- identify a strategy to address housing needs in the most cost-efficient manner.

**Response:** Concur. FLETC’s Mission and Readiness Support Directorate will be taking the lead for implementing this recommendation, as they are best positioned and have the most in-depth knowledge regarding the venues and housing. In regards to identifying, prioritizing, and completing training venue and facility improvements, plans for future facilities have been proposed and have been submitted through DHS Headquarters for Procurement, Construction, and Improvements (PC&I) funding in FY 2019. As part of its standard training management processes, FLETC will continue to work with CBP, ICE, and the other FLETC partner organizations to develop training needs projection packages for the upcoming five-year period. This process ensures formal collaboration among FLETC and its partners, ultimately revealing training venue, facility, and lodging requirements for law enforcement training. For example, ICE Enforcement and Removal Operations (ERO) has engaged with FLETC to identify the increase in training venues and other facility improvements that would be required to accommodate the hiring surge. Also, ICE’s Tactical Operations Unit identified and prioritized ICE-related training venue and facility improvements at Fort Benning, Georgia. Beginning in March 2018, FLETC identified short-, mid-, and long-term strategies and accomplishments in terms of lodging to address lodging needs in the most cost-efficient manner. Components identified solutions to address student lodging needs for the short, mid, and long-term:

a) **Short-Term Lodging Strategy:** In March 2018, the FLETC Director chartered a formal working group to conduct a lodging capacity assessment and develop short-term strategies to increase FLETC’s on-center lodging capacity. In April 2018, a team comprised of FLETC subject matter experts and partner organization representatives from the National Marine Fisheries Service, U.S. Marshals Service, ICE, CBP, and Transportation Security Administration submitted to the Director recommendations for maximizing Glyncor on-center lodging. As a result of the team’s efforts, effective August 1, 2018, FLETC, and its partner organizations agreed to implement double-occupancy for Glyncor dormitory 187, adding an additional 236 beds, for a total bed count of 472. Based on current and
historical data, this approach will yield an average cost avoidance of $390,872 per month, as shown in Table 1:

**Table 1 – Sample Cost Avoidance Based on Double Occupancy – FLETC Glynco\(^1\)**

<table>
<thead>
<tr>
<th>Total Beds in Dorm 187 (at 90% occupancy rate)</th>
<th>Average Daily Off-Center Lodging Cost – Prior to Implementation of Double Occupancy</th>
<th>Average Daily On-Center Lodging Cost – After Implementation of Double Occupancy</th>
<th>Cost Avoidance Per Student, Per Night</th>
<th>Total Average Monthly Cost Avoidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>425</td>
<td>$91.59</td>
<td>$29.25</td>
<td>$62.34</td>
<td>$390,871.80</td>
</tr>
</tbody>
</table>

b) Mid-Term Lodging Strategy: On August 17, 2018, FLETC awarded a contract for the full restoration of Glynco dormitories 185, 186, and 187, two of which have had their entire first-floor rooms offline, while one had seven rooms offline, due to hurricane damage. FLETC anticipates that Glynco will have full double-occupancy capability following the completion of the restoration, thereby increasing the total number of beds on-Center from 2,202 to 2,957 (an increase of 755 beds). (Note: The average routine maintenance rate driving FLETC beds to be offline is 10%, therefore the estimated increase in the total number of available beds would be 679.)

Based on current and historical data, this approach will yield an average cost avoidance of $1.27 million per month, as shown in Table 2:

**Table 2 – Sample Cost Avoidance Based on Dormitory Restoration – FLETC Glynco\(^2\)**

<table>
<thead>
<tr>
<th>Total Beds in Leased Dormitories (90% Occupancy Rate)</th>
<th>Average Daily Off-Center Lodging Cost – Prior to Restoration of Dormitories</th>
<th>Average Daily On-Center Lodging Cost – After Restoration of Dormitories</th>
<th>Cost Savings Per Student, Per Night</th>
<th>Total Average Monthly Cost Avoidance</th>
</tr>
</thead>
<tbody>
<tr>
<td>1,582</td>
<td>$91.59</td>
<td>$29.25</td>
<td>$62.34</td>
<td>$1,271,736</td>
</tr>
</tbody>
</table>

\(^1\) Actual costs of lodging 29 Agency Specific Base classes (average of 29 students each) for an average of 15 nights of off-Center lodging and difference between same student population housed on-Center for December through July 2018.

\(^2\) Data assumes 2,661 beds available (i.e., 2,957 total beds - 10% (296) beds offline for routine maintenance = 2,661 available beds) for the full period of August 1, 2019 through September 30, 2019.
c) Long-Term Lodging Strategy: FLETC will continue to conduct ongoing reviews in support of its requirements for planning, operational development, engineering, and acquisition necessary to provide lodging for basic and advanced training for federal law enforcement personnel. Given availability of funding, FLETC will make prudent investments in facility expansion, improvements, and/or construction as necessitated by increasing demand for law enforcement training at FLETC.

FLETC believes it has developed a comprehensive plan to address this recommendation in the short-, mid- and long-term. We request that the OIG consider this recommendation resolved and closed as implemented.

Recommendation 2: Collaborate with officials from across the Department — including, but not limited to, the Office of the Chief Human Capital Officer (OCHCO), FLETC, CBP, and ICE — to develop and implement standards and procedures to address:

- optimal designations (permanent, term, rotational, temporary duty, or temporary-intermittent/while actually employed) and duration for instructors assigned to FLETC and component training academies to maximize efficiency and effectiveness;
- Homeland Security Investigations’ (HSI) need for an established rotation policy; and
- best practices for securing and retaining qualified instructors while ensuring consistent training.

Response: Concur. OCHCO Strategic Learning, Development and Engagement (SLD&E), along with OCHCO Human Capital Policy and Programs (HCPP), will work with the Components to develop and implement standards to identify the most effective instructor cadre composition for federal law enforcement training. The involvement of both SLD&E and HCPP will ensure we have experts in both training and HR policies advising the team. ECD: September 30, 2019.

The Department is already making progress specific to the recommendation on HSI’s rotation policy. ICE HSI drafted a 2018 HSI Academy, Criminal Investigator, GS1811-Rotation Program to address instructor and management staffing at the ICE HSI Academy. The HSI Rotation Program is in the final deliberative review process with ICE Office of the Principal Legal Advisor, ICE Office of the Chief Information Officer, ICE Office of Policy, and HSI Senior Leaders. ECD: September 30, 2019.

OCHCO agrees that the Department should investigate and implement processes for securing and retaining qualified instructors while ensuring consistent training. OCHCO Office of Strategic Recruitment, Diversity and Inclusion will assist the FLETC Human
Resources team to identify best practices and recommendations for implementation.
ECD: March 30, 2019.

Overall ECD: September 30, 2019.

The OIG recommended the Director of FLETC:

**Recommendation 3:** Convene training officials from CBP, ICE, and other appropriate Partner Organizations department-wide to inform and assist FLETC in its efforts to finalize a Strategic Plan for FYs 2019–22. The group should coordinate to ensure FLETC can accommodate increases in demand and to minimize disruption to law enforcement agency hiring and training plans.

**Response:** Concur. On June 6, 2018, the Secretary of Homeland Security ratified FLETC’s revised mission, vision, and values statements, and on June 22, 2018, the Acting Deputy Secretary and Under Secretary for Management approved FLETC’s new strategy-centric organizational realignment (SCORE). This documentation was provided to the OIG under separate cover. All elements of the FLETC Director’s new strategic direction for FLETC intentionally place the partner organizations and their needs at the epicenter of FLETC’s focus.

In the lead up to these efforts, as a means to inform and refine his strategic vision, the FLETC Director met with FLETC’s partner organization representatives to gain their valuable insights and feedback. Since being appointed, the FLETC Director has hosted two Partner Organization Training Executives Forums (POTEFS) in Washington, DC and Glynco, Georgia, the purpose of which was to discuss key topics with Senior Executive leaders from the partner organizations. Topics addressed included FLETC’s and its partners’ training projection process; the budget process associated with those projections; and the Border and Immigration Executive Orders and their effects on FLETC and its partners. Additionally, the FLETC Director and Deputy Director have conducted extensive “Listening Tours” to hear the insights and concerns of FLETC partner organization representatives, as well as FLETC staff members from all levels of the organization. The FLETC Director has committed that he will continue to conduct Listening Tours as an ongoing effort to receive direct input from partners. In addition to the Listening Tours and POTEFS, the FLETC Director, Deputy Director, and their senior leaders meet formally on a monthly basis with FLETC’s partner organization representatives to discuss strategic, operational, and resource issues, and to ensure ongoing collaboration in developing short- and long-term plans to address their training needs.

The FLETC Director has socialized FLETC’s revised mission statement with FLETC’s staff and partner organizations, and intends to unveil his strategic vision and values statements in the next few weeks. The Director is nearing completion of FLETC’s
strategic goals for 2019-2022, which are grounded in the insights and feedback he has received from Partner Organizations over his first 10 months of service at FLETC. Likewise, the Director intends to work with staff and partner organizations in the coming weeks to develop FLETC’s associated strategic objectives. On or about September 30, 2018, the Director will also implement the SCORe, which will optimally position FLETC to realize its revised mission and vision statements. We request that the OIG consider this recommendation resolved and closed as implemented.
Appendix C
USBP and ICE Hiring Projections, Anticipated Attrition, and Recruitment Efforts

USBP Hiring and Anticipated Attrition

USBP’s hiring plan, under Executive Order (EO) 13767, spans 7 years from FYs 2019–25 and accounts for an academy attrition rate of approximately 15 percent.15 During the 7-year proposal, USBP plans to hire 1,050 Border Patrol Agents per year, for a total of 7,350 agents. Accounting for 15 percent attrition, CBP projects 6,251 agents must complete academy training in order to fulfill the EO, as outlined in table 3.

Table 3: CBP Projected Hiring Plan (as of January 2018)

<table>
<thead>
<tr>
<th>FY</th>
<th>USBP Projected Hiring</th>
<th>Training Attrition</th>
<th>Expected Graduation</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2020</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2021</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2022</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2023</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2024</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>2025</td>
<td>1,050</td>
<td>157</td>
<td>893</td>
</tr>
<tr>
<td>Total</td>
<td>7,350</td>
<td>1,099</td>
<td>6,251</td>
</tr>
</tbody>
</table>

Source: Data provided by CBP

In July 2017, we reported that USBP had an authorized agent staffing level of 21,370 with 1,805 vacancies as of April 1, 2017.16 As of January 2018, USBP continued to lose agents, and was approximately 2,003 agents short of its baseline 21,370 — not including the additional 5,000 Border Patrol Agents mandated by the EO.

In FY 2017, CBP reported a 4.6 percent staff attrition rate for USBP agents. USBP, through exit surveys, identified the number one reason agents were leaving the U.S. Border Patrol was due to lack of mobility and reassignment opportunities. In response to this issue, USBP developed the Operational Mobility Program, which allows USBP to provide nationwide reassignment opportunities to its agents while authorizing a lump sum relocation benefit to

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14 Executive Order 13767- Border Security and Immigration Enforcement Improvements, January 25, 2017
15 This attrition rate takes into account training injuries and trainees given a second chance to graduate from the training program.
assist with the costs of relocating. For locations identified as difficult to retain employees, USBP will authorize a relocation incentive with a 1-year service agreement.

**USBP Recruitment Efforts**

USBP developed its *2018 Recruitment Vision, Mission, Strategy, and Goals* in an attempt to unify all USBP sectors into one vision, and is driving recruitment efforts toward targeted applicant pools. Additionally, USBP established the National Frontline Recruitment Strategy to address immediate and long-term hiring objectives, and built the National Frontline Recruitment Command to increase organizational capability and address recruitment challenges. In November 2017, CBP entered into a hiring contract to hire 5,000 Border Patrol Agents over a 5-year period.17

**ICE Hiring and Attrition**

ICE provided several hiring plans, including a 4-year span for FYs 2018–21, in which ICE planned to hire 8,500 ERO officers and 1,500 HSI agents, as outlined in table 4. ICE officials last reported in January 2018 that they are still in the process of revising the timeframe in which they will “on-board” 10,000 new law enforcement officers.

<table>
<thead>
<tr>
<th>Directorate</th>
<th>FY18</th>
<th>FY19</th>
<th>FY20</th>
<th>FY21</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>ERO</td>
<td>850</td>
<td>2,550</td>
<td>2,550</td>
<td>2,550</td>
<td>8,500</td>
</tr>
<tr>
<td>HSI</td>
<td>150</td>
<td>450</td>
<td>450</td>
<td>450</td>
<td>1,500</td>
</tr>
<tr>
<td>Total</td>
<td>1,000</td>
<td>3,000</td>
<td>3,000</td>
<td>3,000</td>
<td>10,000</td>
</tr>
</tbody>
</table>

*Source: Data provided by ICE*

ICE did not include staff or academy attrition in its hiring projections, as outlined in table 4. For 2017, ERO reported a 3.6 percent, and HSI reported a 4.3 percent annualized staff attrition rate. In the same period, ERO reported a 12.2 percent, and HSI reported a 5.9 percent basic academy attrition rate.

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17 CBP contracted to hire new Border Patrol Agents at a cost of approximately $40,000 per new agent hired. However, CBP will still perform final hiring adjudications, which will require CBP resources and personnel. In a January 3, 2018 letter to the Acting Commissioner of CBP, the Senate Homeland Security and Governmental Affairs Committee requested information to determine the reasonableness of this contractual arrangement.
ICE Recruitment Efforts

In July 2017, we reported ICE considered initiating recruitment strategies, such as hosting “Super One Stop” (one-day) hiring events and obtaining direct hiring authority, both of which would expedite the hiring process.\(^\text{18}\) In January 2018, an official from ICE’s Office of Human Capital stated it does not currently have a sufficient pool of candidates to fill both current vacancies and the positions expected to arise from EO 13768.\(^\text{19}\)


\(^{19}\) Executive Order 13768 - Enhancing Public Safety in the Interior of the United States, January 25, 2017
Appendix D
Office of Audits Major Contributors to This Report

Christine Haynes, Director
Cecilia Carroll, Audit Manager
Mike Brunelle, Auditor-In-Charge
Tim Fonseth, Program Analyst
John Kohler, Program Analyst
Christine Meehan, Auditor
Roger Thoet, Auditor
Kevin Dolloson, Communications Analyst
Ellen Gallagher, Communications Analyst
Christina Sbong, Independent Referencer
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