



U.S. Customs and Border Protection Port of Entry Workload Staffing Models

August 21, 2023

Fiscal Year 2023 Report to Congress



**Homeland
Security**

U.S. Customs and Border Protection

Message from the Acting Deputy Commissioner of CBP

August 21, 2023

I am pleased to submit the following report, “Ports of Entry Workload Staffing Models,” prepared by U.S. Customs and Border Protection (CBP).



The report was compiled pursuant to language in the Joint Explanatory Statement accompanying the Fiscal Year (FY) 2023 Department of Homeland Security (DHS) Appropriations Act (P.L. 117-328). The report provides details on CBP’s process and criteria used to determine the number of personnel assigned to ports of entry (POE) throughout the United States. The report includes a description, methodology, elements, calculations, and the most recent results of CBP’s Workload Staffing Model (WSM), Agricultural Resource Allocation Model (AgRAM), and Mission and Operational Resource Allocation Model (MOSRAM).

Pursuant to congressional requirements, this report is provided to the following Members of Congress:

The Honorable David Joyce
Chairman, House Appropriations Subcommittee on Homeland Security

The Honorable Henry Cuellar
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Chris Murphy
Chair, Senate Appropriations Subcommittee on Homeland Security

The Honorable Katie Britt
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

I would be pleased to respond to any questions. Please do not hesitate to contact my office at (202) 344-2001.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Flores". The signature is fluid and cursive, written over a white background.

Pete R. Flores
Acting Deputy Commissioner
U.S. Customs and Border Protection

Executive Summary

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

CBP Agriculture Specialists (CBPAS), partner with the U.S. Department of Agriculture's Plant Protection and Quarantine to inspect agricultural imports. With ever-increasing trade, new pest pathways are discovered and agricultural risks to the United States grow. Introduction of a single disease or pest is often a potentially deadly, infectious, or pathogenic organism, which can destroy U.S. forestry, grain, or animal (cattle, swine, and poultry) industries potentially resulting in billions of dollars of lost revenue compounded by time to recover from such catastrophes.

Recognizing these challenges and the requirement to refine existing strategies, CBP developed a robust, integrated, long-term strategy for improving port operations called the Resource Optimization Strategy. The Resource Optimization Strategy was introduced in the FY 2012 congressional report on "Resource Optimization at Ports of Entry" with three pillars: identify staffing requirements by accurately utilizing the WSM and subsequently the AgRAM; reduce staffing requirements by transforming business processes through business transformation initiatives; and develop strategies to fund required staff.

CBP began development of the latest of the three models, MOSRAM, in 2015 to accurately depict the myriad functions and workload conducted by OFO's mission support personnel. Development of the MOSRAM allowed CBP leadership to make resource decisions that put CBPOs and CBPASs back on the frontline by adequately supporting them with more cost-effective mission support personnel.

This report outlines how CBP utilizes WSM, AgRAM, and MOSRAM to inform staffing decisions at POEs. Although business process improvements were successful, updated WSM results continue to show a need for an additional capability to maintain current processes and procedures; meet standards set by statute, regulations, CBP policies; and support anticipated growth in travel and trade volumes.

Recent results of the FY 2023 WSM, AgRAM, and MOSRAM, are based on FY 2022 workload volume data and project staffing needs through FY 2024.

- The FY 2023 WSM recommendation is 30,273 CBPOs.
- The FY 2023 AgRAM recommendation is 3,035 CBPAS.
- The FY 2023 MOSRAM recommendation is 3,817 Mission Support Specialists, 2,561 Technicians, 282 Paralegal Specialists, and 293 Seized Property Specialists.



Staffing Methodology at Ports of Entry

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I. Legislative Language

This report is submitted pursuant to the legislative language set forth in Joint Explanatory Statement accompanying the Fiscal Year (FY) 2023 Department of Homeland Security (DHS) Appropriations Act (P.L. 117-328), which states:

Workload Staffing Model - \$5,000,000 shall not be available for obligation until the reports concerning human capital strategic plans and the Office of Field Operations workload staffing model that are directed in such explanatory statement are submitted to the Committees on Appropriations of the Senate and the House of Representatives.

Not later than 90 days after the date of enactment of this Act, CBP shall provide a report to the Committees on the results of the most current Trade and Travel Workload Staffing Model, to include results; descriptions of any other models related to workload at ports of entry; and a comparison of model results. The agreement withholds funds from the Executive Leadership and Oversight PPA pending delivery of the report.

II. Background

U.S. Customs and Border Protection (CBP) was formed on March 1, 2003, as a component of the U.S. Department of Homeland Security (DHS), combining parts of the U.S. Customs Service, the Immigration and Naturalization Service, and the U.S. Department of Agriculture. The Office of Field Operations (OFO) is the largest operational component within CBP, with more than 30,000 employees responsible for carrying out CBP's complex and demanding border security mission at 328 air, land, and maritime ports of entry (POE) and 70 international locations in more than 40 countries. At POEs, CBP Officers (CBPO) are responsible for the interdiction of persons and goods illegally entering or exiting the United States; facilitating and expediting the flow of legitimate travelers and trade; and interdiction of terrorists, smugglers, traffickers, and those whose activities undermine the security of the United States.

CBP Agriculture Specialists (CBPAS) support CBP's mission to protect the border by preventing entry of threats to American agriculture and natural resources and target, detect, and intercept pests and other agricultural products that pose a serious threat to U.S. agricultural security, natural resources, and economy. CBPAS are the first line of defense against imported products that may contain foreign animal diseases, exotic plant pests, biohazardous products, or other threats that pose a multibillion-dollar risk to the United States agriculture industry and natural resources.

CBP's mission support and technicians are responsible for supporting frontline personnel in their roles by taking on administrative and support work that is critical to the day-to-day operations of CBP's POEs. Fines, Penalties, and Forfeiture (FPF) staff perform administrative legal processing of seizures initiated by field personnel and Special Agents with Immigration and Customs Enforcement, Homeland Security Investigations.

On a typical day in FY 2023, CBP processes more than 850,000 passengers and pedestrians; more than 250,000 incoming international air passengers; more than 90,000 truck, rail, and sea containers; more than 100,000 shipments of goods approved for entry; and more than \$300 million in fees, duties, and tariffs at U.S. POEs. CBP also seizes more than 2,500 pounds of drugs, 2,500 prohibited plant materials and/or animal products, and more than \$200,000 in unreported currency; arrests approximately 41 people; and refuses entry to more than 1,300 inadmissible non-citizens. Additionally, CBPAS interdict more than 200 pests and more than 2,500 prohibited plant materials and/or animal products at POEs daily.

III. FY 2023 Workload Staffing Model (WSM)

CBP has documented staffing challenges at POEs since FY 2012 with submission of the congressional report on “Resource Optimization at Ports of Entry.” This report introduced the Workload Staffing Model (WSM) as a decision support tool used to inform CBPO staffing decisions at air, land, and sea ports. Although the WSM identifies workload-driven staffing needs, CBP continues to operate on the basis of political and economic demand, resulting in many small-volume locations where workload analysis alone does not support the maintenance of an operation.

The FY 2023 WSM shows a marked increase in need from previous years. This is due to several factors, most significantly an additional focus on outbound enforcement operations and increased workload and threats faced along the Southwest border (SWB). Outbound operations accounted for an additional estimate of approximately 1,000 CBPOs across the air, sea, and land environments, most significantly at the SWB. New workload modeled this year also accounts for an increase in migrant encounters at POEs and increased enforcement presence required at the SWB. These workload activities accounted for an increased workload of approximately 160 CBPOs along the SWB. These new activities, along with travel volume recovery after the lifting of Coronavirus Disease 2019 travel restrictions, increased WSM results over previous years.

A. WSM Methodology

The WSM employs a rigorous, data-driven methodology to identify staffing requirements. It comprises multiple elements—some fixed and others variable—that may be adjusted according to changing priorities, risks, and threats. The WSM considers all business processes required of CBPOs, the workload associated with those business processes, and the true level of effort required to carry out daily missions effectively. The WSM identifies personnel required to accomplish critical current missions capturing future staffing requirements for new or enhanced facilities, technology deployments, and anticipated growth in trade and travel.

OFO’s staffing requirement approach identifies the WSM baseline results, requirements for facility enhancements, technology deployments, and requirements for conservatively projected growth through FY 2024.

B. Workload Elements Considered by WSM

Table 1 provides a more detailed explanation of the elements that form the basis for the WSM’s calculations that determine staffing requirements.

Table 1	
WSM Elements	
Element	Description
Volume	The annualized counts of all activities identified by specific workload drivers at each location where these activities are performed. The WSM currently is populated with a full set of FY 2022 data for around 100 CBPO activities. These cumulative activities represent the processes that CBPOs execute in all operational environments – including air, land, and sea modes; immigration and customs missions; and primary, secondary, and enforcement actions.
Processing Times	Each activity has an associated processing time, representing the level of effort (in minutes or hours) that a CBPO expends each time that he or she carries out the activity.
Available Hours	The number of annual work hours for a full-time equivalent (FTE) CBPO, net of time away for holidays, vacation, sick leave, training, and administrative and mission support responsibilities, as well as temporary duty assignments.
Percentage Increases	Factors that account for supervisors and special dedicated teams, such as passenger analytical units and advanced targeting units. These are responsibilities that tend to be driven by overall volume, for which there are no countable transactions that drive the workload.
Operational Coverage	Some CBPO responsibilities exist independent of traffic volume levels. Low-volume ports require minimum staffing levels to keep the ports operational. Some equipment or locations within a POE (e.g., exit points) require dedicated staffing regardless of usage rates. Finally, the complexity of a POE, as characterized by multiple crossings or multiple terminals, adds to the staffing burden.
Future Requirements	Program offices provide estimates of future staffing requirements for new or expanded facilities and technology deployments.

The WSM uses the above input elements to calculate the staffing requirements at each individual POE location.

C. WSM Calculations

The main calculation steps are described in Table 2.

Table 2	
WSM Calculation Steps	
Calculation Step	Description
Workload FTEs	The volume, processing times, and available hours elements are used to calculate the workload FTEs. For each activity at each location, the volume multiplied by the processing time equals the annualized work hours. These work hours divided by the available hours equal the Workload FTEs. The Workload FTEs for all activities at each location are tallied to arrive at a total Workload FTE requirement for each location. $\text{Workload FTEs} = (\text{Volume} * \text{Processing Time}) / \text{Available Hours}$
Percentage Increases Application	Each location's overall FTEs or a specific volume-based activity multiplied by the percentage increase factor for each respective special activity equals the required staffing for those activities (supervisors, special teams, etc.).
Facility and Technology Coverage	The minimum staffing factors multiplied by each location's unique set of facility and technology characteristics equals the additional staffing required for facility and technology coverage.
Future Requirements	The future requirements for each location are added to the previously calculated staffing requirements as part of an integrated staffing requirement matrix.

The first three steps (Workload FTEs, Percentage Increases Application, and Facility and Technology Coverage calculation) combine to determine current estimated staffing requirements and consider new or renovated POEs as well as the increase in cross-border commercial and passenger traffic as of the end of FY 2022. The fourth step (Future Requirements) identifies the additional CBPOs required for facility enhancements and technology deployments planned through FY 2024.

Leveraging the WSM methodology, CBP also developed the Agriculture Resource Allocation Model (AgRAM) as an analytical tool to calculate the required number of CBPAS based on the volume and composition of arrivals. The model considers both legally mandated inspection of regulated cargo as defined by the U.S. Department of Agriculture (USDA) Animal Plant and Health Inspection Services and risk-based inspections of passengers and cargo. The model considers volume of cargo, conveyance, and passenger arrivals in all environments collected in the Operations Management Report database. The AgRAM also utilizes USDA Animal Plant and Health Inspection Services data to determine the various work counts in all environments and incorporates pest risk levels as determined by USDA. Inclusion of pest risk data provided by USDA ensures sufficient staffing is allocated for inspection of high-, medium-, and low-risk commodities, passengers, and conveyances.

IV. Staffing by Environment

The WSM analyzes workload by specific environment and type of operation, accounting for cargo and passenger processed by air, sea, and northern and southwest land borders. Based on workload analysis by activities in these environments, CBPO staffing is broken down by approximately 39 percent in the air environment, 10 percent in the sea environment, 14 percent at the Northern border, and 32 percent at the Southwest border. The remaining 5 percent of staffing is assigned to field offices, headquarters, and the National Targeting Center.

Workload is calculated on the basis of major volume drivers such as conveyance arrivals, passenger arrivals, manifested and non-manifested cargo, and containers per POE and by environment. Additional workload calculations consider physical and nonintrusive examination results, enforcement actions, and administrative responsibilities related to the inspection of cargo and passengers per POE and by environment. As detailed above, total hours necessary to carry out these functions are divided by available hours to calculate FTE needed. In addition to these workload-driven activities, the percentage increases on the basis of overall volume drivers or total FTEs for which there are no quantifiable transactions (e.g., supervision, targeting, and enforcement teams).

The AgRAM analyzes workload by specific environment and type of operation, accounting for cargo and passenger processing by air, sea, and Northern and Southwest land borders. Based on workload analysis by activities in these environments, CBPAS staffing is broken down by approximately 50 percent in the air environment, 19 percent in the sea environment, 8 percent at the Northern border, and 20 percent at the Southwest border. The remaining 3 percent of staffing is assigned to field offices, headquarters, and the National Targeting Center.

As of the end of FY 2022, CBP was staffed at 100 percent of its FY 2022 CBPO allocated staffing level of 25,437 for POEs, while CBPAS onboard staffing is 97 percent of the allocated staffing level of 2,780 for POEs.

V. FY 2023 AgRAM

CBP introduced the AgRAM in the FY 2015 Resource Optimization Strategy at Ports of Entry. The AgRAM serves as one of the analytical frameworks and is a core element of CBP's Resource Optimization Strategy to ensure informed staffing needs at POEs are identified through a thorough and validated data analysis process. Staffing models are a corporate and government standard for determining resource needs. The AgRAM is an analytical tool that provides information on optimal staffing levels – based on specific input criteria – to carry out operations and adequately staff priority areas. The model considers all business processes required of a CBPAS, workload associated with those business processes, and true level of effort required to effectively carry out the daily mission.

A. AgRAM Methodology

The AgRAM is an analytical tool developed by CBP to calculate the required number of CBPAS based on volume and composition of arrivals. The model considers both legally mandated inspection of regulated cargo as defined by USDA Animal and Plant Health Inspection Service (APHIS) and risk-based inspection of passengers and cargo. The AgRAM also utilizes USDA APHIS data to determine various work counts in all environments and incorporates foreign animal disease and exotic plant pest risk levels as determined by USDA. Inclusion of pest risk data provided by USDA ensures that sufficient staffing is allocated for inspection of high-, medium-, and low-risk commodities, passengers, and conveyances.

The travel time required of CBPAS is included in the model on a port-level basis, as travel time in some geographic areas is significant. Travel time required to conduct physical inspection and compliance inspection at alternate locations is considered and incorporated into the model. Continued and ongoing training of CBPAS is very important; therefore, training requirements are also considered and included. The AgRAM accounts for the National Agriculture Release Program, as well as the National Agriculture Inspection Program-Canadian Origin, both of which monitor entry of very low-risk, high-volume agriculture commodities into the United States. Additional workload included in this year's model is the newly emerging pathway of threat with biological materials. Biological materials — dual-use agents, such as Ebola and smallpox, vectors of animal and human pathogenic diseases, poisonous seeds, toxins, and organismal components, such as cellular and genetic materials — enter the United States via international mail shipments along with cargo and passenger environments.

B. Workload Elements Considered by AgRAM

The AgRAM draws upon various data sources to calculate the estimated staffing requirement. Table 3 explains the elements that form the basis for the AgRAM’s calculations.

Table 3	
AgRAM Elements	
Element	Description
Volume	The annualized counts of the mutually exclusive and collectively exhaustive CBPAS activities at each location where these activities are performed. The AgRAM is currently populated with a full set of FY 2022 data for more than 80 CBPAS activities. These activities together represent the processes CBPAS carry out in all CBP OFO operational environments including air, land, and sea environments, as well as mail facilities and foreign trade zones; travel time to and from inspectional sites; agriculture mission and compliance enforcement; and secondary and enforcement actions.
Agriculture Risk	USDA APHIS defines the animal and plant health risk ratings (high, medium, low) by country of origin of each cargo commodity of agricultural interest that makes entry into the United States. USDA APHIS also defines the risk level of passengers based on the origination point of a flight.
Processing Times	Each activity has an associated processing time, representing the level of effort (in minutes or hours) a CBPAS expends each time they carry out the activity.
Port-Specific Programs and Trade Initiatives	Activities that are highly specialized by port and season are added to the model, along with special trade initiatives.
Available Hours	The number of annual work hours for an FTE CBPAS, net of time away for holidays, vacation, sick leave, training, administrative, and mission support responsibilities.
Resource Utilization	Factor that accounts for peaks and valleys in arrival volume, based on a simulation study. As the utilization factor for a CBPAS increases, that resource is busy for a greater percentage of the available time.
Percentage Increases	Factors that account for anticipated increases in cargo and passenger volume.

C. AgRAM Calculations

The AgRAM uses the input elements in Table 3 to calculate the staffing requirements at each POE. The main calculation is as follows – the volume, processing times, available hours, and resource utilization factor model elements are used to calculate the workload FTEs. For each activity at each location, the volume multiplied by the processing time equals the annualized work hours. These work hours are divided by the product of the available hours and utilization

factor. This quotient equals the number of CBPAS FTEs. FTEs for all activities at each location are tallied to arrive at a total FTE requirement for each location.

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

VI. FY 2023 Mission and Operational Support Resource Allocation Model

CBP's OFO Mission and Operational Support Resource Allocation Model (MOSRAM) is a data-driven decision support tool that analyzes workload data to generate Mission and Operational Support (MOS) and FPF staffing recommendations at CBP POEs. The purpose of the MOSRAM is to model an efficient workforce to conduct the many support functions that occur within the agency.

The MOSRAM models this workload to give leadership a data-driven, decision-support tool that enables more effective mission execution and use of CBP's staffing resources. The MOS staff are more specialized for administrative work and have more available hours to work throughout the year; therefore, they are more efficient and effective at MOS work than the frontline staff. CBPOs and CBPAS perform these functions now out of necessity and in the margins of their time around their primary law enforcement duties. The MOS staff are also more cost effective and easier to hire when compared to uniformed staff performing MOS functions today. Once new MOS staff are hired and trained to accomplish existing administrative and operational support work, there is an immediate positive impact to operations. Frontline staff are able to redirect time to frontline duties. This provides a POE with additional CBPO, CBPAS, and trade staff -hours without having to hire and onboard new positions.

Currently, the MOSRAM models all workload and provides recommendations for work conducted by mission support specialists, CBP technicians, FPF officers, seized property specialists, FPF technicians, and paralegal specialists. Both the WSM and AgRAM employ a multi-faceted data-driven methodology to identify staffing requirements at POEs that is then capable of adjustment according to changing priorities, risks, and threats. The MOSRAM is a supplemental model to WSM and AgRAM, measuring the previously unmodeled body of OFO mission and operational support work. The MOSRAM, WSM, and AgRAM have no overlap in workload measured by the respective models, but rather represent OFO's efforts to comprehensively model optimal staffing levels at CBP POEs.

As of the end of FY 2022, CBP was staffed at 80 percent of its FY 2022 MOS allocated staffing level and 94 percent of its FY 2022 FPF allocated staffing level for POEs.

A. MOSRAM Methodology

The MOSRAM implements an iterative cycle of data collection, analyzation, visualization, and validation to conduct regular model updates and support model expansion into new program areas. The MOSRAM methodology is based on four key components which form the basis of the MOSRAM methodology:

- 1) Identify new activities and workload drivers and survey the CBP population,
- 2) Analyze survey data and perform Time/Volume calculations,
- 3) Input workload data and develop data visualization tools, and

- 4) Validate recommendations with subject matter experts and publish the recommendations to the field.

B. Data Elements Considered by the MOSRAM

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

Table 4	
MOSRAM Elements	
Element	Description
Activity Category	Large, overarching, categories that encompass multiple activities of similar types (i.e., Budget, Facilities, etc.). Currently within the MOSRAM there are 10 activity categories.
Activity	Discrete functions conducted by positions modeled within the MOSRAM (i.e., vehicle maintenance, uniform program management, etc.). Currently within the MOSRAM there are 87 total activities.
Workload Driver	Metrics used to evaluate the level of effort in person-hours required by each activity. For example, the activity of ‘purchasing procurement and supplies’ is measured by the workload driver of ‘number of purchases.’ To measure the 87 current activities within MOSRAM, there are 85 workload drivers. Workload drivers are not exclusive to specific activities and some workload drivers are combined for different activity time/value calculations.
Percentage Increases	Factors that account for anticipated increases cargo, passenger and other applicable volume driving MOS and FPF workload.

C. MOSRAM Calculations

MOSRAM recommendations are based upon the following calculation – volume, processing times, and available hours are used to calculate workload FTEs. For each activity at each location, volume is multiplied by the processing time that equates to annualized work hours. These work hours are divided by available hours by position series. This quotient equals the number of MOS and FPF FTEs. The FTEs for all activities at each location are tallied to arrive at a total FTE requirement for each location.

A percentage workload increase is assumed to project increased workload requirements through the following fiscal year.

This calculation allows CBP, through regular updates, to adjust the average time it takes to complete activities and total activity volume. As these numbers adjust, they allow for dynamic changes in the model that demonstrate accurate staffing recommendations based upon existing workload levels.

VII. Future Enhancements to CBP Staffing Models

Carrying out CBP's mission of protecting the American people, safeguarding our borders, and enhancing the nation's economic prosperity requires a continuous evaluation of evolving operational threats and priorities. Staffing models are annually reviewed and updated to reflect risk profiles and emerging threats. Just as outbound and biological workload were included in this year's WSM and AgRAM respectively, CBP is considering enhancements to the model in future years.

VIII. Conclusion

CBP is committed to ensuring the security of our Nation's borders in all environments, while facilitating legitimate travel and trade. Resource optimization efforts are vital to increasing capacity, improving operations at POEs, and contributing to economic growth. These efforts are also necessary to enhance international trade and travel experiences for our stakeholders. CBP utilizes data-driven analytics to assess operations and determine resource needs at our POEs and risk-based analytics to evaluate and prioritize those needs. Partnering with USDA enables CBP to keep pace with emerging agricultural threats through training and continuous evaluation of operations and programs. CBP continues to explore new technologies to streamline processes and partnerships with stakeholders and mitigate impacts of staffing deficits.

IX. Appendix - List of Acronyms

Acronym	Definition
AgRAM	Agriculture Resource Allocation Model
APHIS	Animal and Plant Health Inspection Service
CBP	U.S. Customs and Border Protection
CBPAS	U.S. Customs and Border Protection Agriculture Specialist
CBPO	U.S. Customs and Border Protection Officer
DHS	U.S. Department of Homeland Security
FTE	Full-Time Equivalent
FPF	Fines, Penalties, and Forfeiture
FY	Fiscal Year
MOS	Mission and Operational Support
MOSRAM	Mission and Operational Resource Allocation Model
OFO	Office of Field Operations
POE	Port of Entry
USDA	U.S. Department of Agriculture
WSM	Workload Staffing Model