



Staffing Methodology at Ports of Entry

October 8, 2019

Fiscal Year 2019 Report to Congress



Homeland
Security

U.S. Customs and Border Protection

Message from the Deputy Commissioner of CBP

October 8, 2019

I am pleased to submit the following report, “Staffing Methodology at Ports of Entry,” which has been prepared by U.S. Customs and Border Protection (CBP).

The report has been compiled pursuant to the language set forth in Senate Report 115-283 accompanying the Fiscal Year (FY) 2019 Department of Homeland Security Appropriations Act (P.L. 116-6). 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 of CBP’s Workload Staffing Model (WSM) methodology, elements, calculations, and most recent results.



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

The Honorable Lucille Roybal-Allard
Chairwoman, House Appropriations Subcommittee on Homeland Security

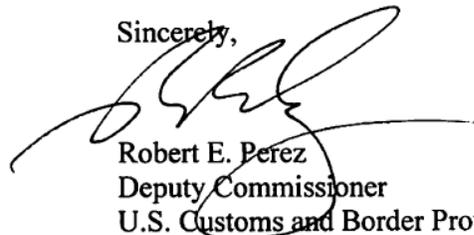
The Honorable Chuck Fleischmann
Ranking Member, House Appropriations Subcommittee on Homeland Security

The Honorable Shelley Moore Capito
Chairman, Senate Appropriations Subcommittee on Homeland Security

The Honorable Jon Tester
Ranking Member, Senate Appropriations Subcommittee on Homeland Security

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

Sincerely,



Robert E. Perez
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 the 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.

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 (ROS). The ROS 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 Agriculture Resource Allocation Model (AgRAM), reduce those staffing requirements by transforming business processes through Business Transformation Initiatives, and develop strategies to fund the required staff.

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

The most recent results show an estimated need for 26,837 CBP officers within OFO through FY 2020, which is 2,390 more than the 24,447 authorized in FY 2018 and 3,586 more than the 23,251 onboard at the end of FY 2018. The AgRAM shows an estimated need for 3,148 CBP agriculture specialists within OFO through FY 2020, which is 707 more than the 2,441 funded in FY 2018 and 718 more than the 2,430 onboard at the end of FY 2018.

The FY 2020 President's Budget supports legislative proposals for consideration by the relevant House and Senate authorizing committees to raise the Immigration User Fee (IUF) and Consolidated Omnibus Budget Reconciliation Act (COBRA) fees to decrease the shortfall between the costs of CBP's customs and immigration inspection activities and the collections received. If enacted, this would allow CBP to fund fully the 2,391 additional CBPOs, which will result in improved customs and immigration inspection services provided to those who pay this fee when traveling to the United States.

CBP is committed to ensuring the security of our Nation's borders, while continuing to facilitate legitimate travel and trade. CBP's partnerships with local governments, business groups, and the trade and travel industries have resulted in significant progress in ensuring the safety and security of the Nation's POEs.



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 Senate Report 115-283 accompanying the Fiscal Year (FY) 2019 Department of Homeland Security Appropriations Act (P.L. 116-6).

Senate Report 115-283 states:

Large Airport Staffing Requirements - Border security efforts must not be limited to the contiguous United States, and effective border security cannot be achieved without an appropriate focus on all POEs, including those at airports. CBP should assess and ensure that hiring practices and procedures reflect and meet the needs of large U.S. international airports in States that do not share a contiguous land border with Mexico or Canada to ensure that such airports are appropriately staffed. In doing so, CBP should consider the per capita number of international tourist passenger enplanements each year. Not later than 60 days after the date of enactment of this act, CBP shall submit to the Committee a workload staffing model detailing the process and criteria used to determine the number of personnel assigned to POEs at all airports and shall include specific information relevant to determinations at large U.S. international airports in States that do not share a contiguous land border with Mexico or Canada.

II. Background

The Office of Field Operations (OFO) is the largest Component within U.S. Customs and Border Protection (CBP) with more than 28,000 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 the interdiction of terrorists, smugglers, traffickers, and those whose activities undermine the security of the United States.

On a typical day, CBP processes more than 1 million passengers and pedestrians; nearly 500,000 aliens; more than 350,000 incoming international air passengers; more than 80,000 truck, rail, and sea containers; more than 95,000 shipments of goods approved for entry; and more than \$130 million in fees, duties, and tariffs at U.S. POEs. In addition, CBP seizes more than 1.8 kilograms of drugs, 100 shipments, 4,500 prohibited plant materials and/or animal products, and more than \$175,000 in unreported currency; arrests approximately 75 people; refuses entry to more than 750 aliens; and interdicts more than 300 agricultural pests and diseases at POEs daily.

Continued growth in international trade and travel, expanding mission requirements, emerging threats, and new facility demands continue to strain CBP resources and efforts to secure the homeland. Recognizing these challenges, CBP developed the Resource Optimization Strategy (ROS), which has three pillars: (1) identify staffing requirements by accurately utilizing the Workload Staffing Model (WSM), (2) reduce those staffing requirements by transforming business processes, and (3) develop strategies to fund the required staff.

CBP implemented the ROS to address the staffing challenges at the POEs. In FY 2012, CBP documented the ROS process with the submission of the first congressional report on "Resource Optimization at Ports of Entry." Subsequently, CBP reports annually in the Report on Business Transformation Initiatives (BTI), which outlines staffing requirements and BTIs that allow CBP to realign CBPOs and CBP agriculture specialist (CBPAS) resources to priority initiatives. BTIs reduce required inspection hours, resulting in a decrease in overall workload requirements and equivalent staffing that creates a cost avoidance of CBPO and CBPAS salaries and expenses.

The ROS reports and the BTI reports issued in previous years provide WSM results, along with detailed information on the BTIs implemented or enhanced in the respective fiscal years, that can be found at <http://www.cbp.gov/border-security/ports-entry/resource-opt-strategy>.

III. FY 2019 Workload Staffing Model Methodology and Results

CBP has documented staffing challenges at the POEs since FY 2012 with the submission of the congressional report on “Resource Optimization at Ports of Entry.” This report introduced the 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, many small-volume locations where workload analysis does not support maintenance of an operation.

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 the daily mission effectively. The WSM identifies the personnel required to accomplish the critical current mission, and it also captures 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 2020. In calculating the CBPO staffing requirements, CBP also subtracts the expected savings of the BTIs from the CBPO requirements to arrive at a total net requirement. The estimated BTI savings through 2020 should reduce the overall CBPO staffing need by almost 300 CBPOs.

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 2018 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 and temporary duty assignments.

Table 1	
WSM Elements	
Element	Description
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 (for instance, exit points) require dedicated staffing regardless of usage rates. Finally, the complexity of a POE, as characterized by multiple crossings or multiple terminals, adds to the staffing burden.
Future Requirements	Program offices provide estimates of future staffing requirements for new or expanded facilities and technology deployments.

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

OFO CBPO and CBPAS Estimated Staffing Requirements through FY 2020



2,391

Current CBPO Staffing Requirement

Staffing Gap Identified by the WSM		310
Facility/Technology Requirements	+	771
Volume Growth	+	1,576
BTI savings	-	266
Net CBPO Requirements	=	2,391

CBPO Staffing Requirements Calculation:

$$(310 + 771 + 1,576) - 266 = 2,391$$



707

Current CBPAS Estimated Staffing Requirement

Health Inspection Service (APHIS) and the risk-based inspection of passengers and cargo. The model takes into account the volume of cargo, conveyance, and passenger arrivals in all environments collected in the Operations Management Report database. The AgRAM also utilizes USDA APHIS data to determine the various work counts in all environments and incorporates pest risk levels as determined by USDA. The 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 most recent results show an estimated need for 26,837 CBPOs within OFO through FY 2020, which is 2,390 more than the 24,447 funded in FY 2018 and 3,586 more than the 23,251 onboard at the end of FY 2018. The AgRAM shows an estimated need for 3,148 CBPASs within OFO through FY 2020, which is 707 more than the 2,441 funded in FY 2018 and 718 more than the 2,430 onboard at the end of FY 2018.

The first three steps (Workload FTEs, Percentage Increases Application, and Facility and Technology Coverage calculation) combine to determine the current estimated staffing requirements, considering the new and renovated POEs that have been brought online as well as the increase in crossborder commercial and passenger traffic as of the end of FY 2018. The fourth step (Future Requirements) identifies the additional CBPOs required for facility enhancements and technology deployments planned through FY 2020.

Leveraging the WSM methodology, CBP also developed the Agriculture Resource Allocation Model (AgRAM) as an analytical tool to calculate the required number of CBPASs based on the volume and composition of arrivals. The model takes into account both the legally mandated inspection of regulated cargo as defined by the U.S. Department of Agriculture (USDA) Animal and Plant

IV. Staffing by Environment

The WSM analyzes workload by specific environment and type of operation, accounting for cargo and passenger processing by air, sea, northern, and southwest land borders. Based on workload analysis by activities in these environments, OFO staffing is broken down by approximately 41 percent in the air environment, 11 percent in the sea environment, 16 percent at the Northern Border, and 27 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 nonmanifested 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, the total hours necessary to carry out these functions are divided by the available hours to calculate the FTEs needed. In addition to these workload-driven activities, the staffing 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).

As of April 2019, CBP is staffed at 96 percent of its FY 2019 enacted CBPO authorized staffing level of 24,392 for ports of entry, with more than 50 percent of the 900+ pending new hires slated for airports. In the air environment, CBPO onboard staffing has remained consistently above 95 percent of the authorized staffing level over the past 5 years, while CBPAS onboard staffing of 2,430 has remained consistently above 98 percent.

Job Category	WSM Estimated Target	FY 2019 Enacted Positions	Onboard Position percentage of WSM as of April 2019	Onboard Positions as of 30 Sep 2018
CBPO	26,837	24,392	96%	23,251
CPBAS	3,148	2,441	98%	2,430

V. Conclusion

CBP is committed to ensuring the security of our Nation's borders in all environments while facilitating legitimate travel and trade.

The WSM continues to show an additional need for staffing in all environments. Given the gap between the current staffing levels and WSM identified estimated need, CBP must use the WSM analysis to allocate positions judiciously to POEs with the greatest need and risk. Staffing challenges are mitigated through the ROS, which includes reducing staffing needs through BTIs and implementing funding strategies to augment appropriated funding for additional CBPOs. CBP continues to explore new technologies to streamline processes and partnerships with stakeholders to mitigate the impact of staffing deficits.

CBP looks forward to working with Congress to address CBP's staffing requirements and welcomes input from legislators, state and local partners, and private-sector stakeholders on transformative initiatives to improve operations in their respective areas of interest.

VI. Appendix - List of Acronyms

Acronym	Definition
AgRAM	Agriculture Resource Allocation Model
APHIS	Animal and Plant Health Inspection Service
BTI	Business Transformation Initiatives
CBP	U.S. Customs and Border Protection
CBPAS	U.S. Customs and Border Protection Agriculture Specialist
CBPO	U.S. Customs and Border Protection Officer
FTE	Full-Time Equivalent
FY	Fiscal Year
OFO	Office of Field Operations
POE	Port of Entry
ROS	Resource Optimization Strategy
USDA	U.S. Department of Agriculture
WSM	Workload Staffing Model