The Department of Homeland Security (DHS) Office of the Chief Information Officer (OCIO) conducted a program health review of the Customs and Border Protection (CBP) Automated Commercial Environment / International Trade Data System (ACE / ITDS) program. This assessment represents the program’s status through March 2012.

Description and Background:
The CBP ACE/ITDS program will form the one system that provides a single window for CBP to interact, manage, and oversee import and export data, perform custodial revenue management and support enforcement systems for end to end visibility of the entire trade life-cycle. In addition, the program has reduced Government and private sector costs by eliminating unnecessary paperwork and enabling electronic processing of manifests, entry, and other trade documentation.

The ACE/ITDS program has had past issues and was the subject of a DHS Program Assessment and Design Review (PADR) in 2009 that resulted in 31 specific recommendations for the ACE M1 project. It was also the subject of an Office of Management and Budget (OMB) TechStat in 2010 that resulted in six recommendations.

All 31 recommendations for the ACE M1 project have been successfully completed and the project is conducting a very successful pilot. ACE MI is currently planning to conduct an operational readiness review in April 2012.

The ACE/ITDS program has successfully closed three of the six OMB TechStat recommendations. The final three recommendations are:

- Initiate modular development approach (6-month deliverable release cycle) for Cargo Release. Deadline: Q1 FY12
- Deliver overall Cargo Release incrementally. Deadline: Release 1 – Q3 FY12
- Deliver overall Cargo Release incrementally. Deadline: Release 2 – Q1 FY13

The program is working on completing these recommendations. Before work can begin on Cargo Release, the DHS Investment Review Board must approve the ACE program re-baseline and make the Acquisition Decision Event (ADE)-2a decision, which should occur in Q4 FY12. The CBP Cargo Systems Program Office (CSPO) will then engage in the additional planning necessary to obtain the ADE-2b decision from the ACE Executive Steering Committee with respect to Cargo Release. In anticipation of beginning work on Cargo Release, CSPO has implemented a plan for evaluating the adoption of Agile as the means of doing modular requirements management and architecture and design development.
Risks and Issues:
The lack of defined requirements is a significant issue as requirements provide the foundation on which the entire program is built.

Mitigation Strategy:
The program office has made the wise decision to return to the ADE-2a Analyze Select Phase. They are also working to define Cargo Release requirements and the required documentation in order to receive ADE-2a and then ADE-2b authority to begin development. CSPO and their customer, the ACE Business Office in CBP’s Office of Trade, have developed a collaborative requirements management model that includes new processes and tools to ensure that requirements are captured accurately in a manner that reflects the true business needs of the customer. CSPO has taken aggressive steps to minimize scope management issues through the adoption of Agile development methodologies and acquisition controls. Once the documentation required for ADE-2a is complete and the development alternative is selected, the program office will be updating the CIP/FYHSP to accurately show available development and operations and maintenance funding based on the revised lifecycle cost model and approved program plan.

Assessment:
ACE/ITDS continues to be a program in transition and is in the midst of a comprehensive program re-plan that will re-baseline the cost, schedule and performance requirements called out in the 2006 acquisition program baseline. The efforts of CSPO to initiate management initiatives to improve overall program performance are showing dividends as evidenced by the success of the M1 project pilot. The program is moving in the right direction but needs to successfully complete its re-plan to provide the solid foundation on which to build a successful program. Therefore, the CIO assesses the CBP ACE/ITDS Program as a Medium Risk.

Score: 3