



Testimony

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and Organic Agriculture, Committee on
Agriculture, House of Representatives

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**AGRICULTURAL
QUARANTINE
INSPECTION PROGRAM**

**Management Problems May
Increase Vulnerability of
U.S. Agriculture to Foreign
Pests and Diseases**

Statement of Lisa Shames, Director
Natural Resources and Environment





GAO
Accountability-Integrity-Reliability
Highlights

Highlights of [GAO-08-96T](#), a testimony before the Subcommittee on Horticulture and Organic Agriculture, Committee on Agriculture House of Representatives

Why GAO Did This Study

U.S. agriculture generates over \$1 trillion in economic activity annually, but concerns exist about its vulnerability to foreign pests and diseases. Under the agricultural quarantine inspection (AQI) program, passengers and cargo are inspected at U.S. ports of entry to intercept prohibited material and pests. The Homeland Security Act of 2002 transferred responsibility for inspections from the U.S. Department of Agriculture's (USDA) Animal and Plant Health Inspection Service (APHIS) to the Department of Homeland Security's (DHS) Customs and Border Protection (CBP). APHIS retained some AQI-related responsibilities, such as policy setting and training.

This testimony is based on issued GAO reports and discusses (1) steps DHS and USDA took that were intended to strengthen the AQI program, (2) views of agriculture specialists of their work experiences since the transfer, and (3) management problems. As part of these reports, GAO surveyed a representative sample of agriculture specialists on their work experiences, analyzed inspection and interception data, and interviewed agency officials.

What GAO Recommends

GAO previously recommended, in part, that DHS and USDA adopt meaningful performance measures for assessing the AQI program's effectiveness and develop a risk based staffing model. The agencies generally concurred with these recommendations.

To view the full product, including the scope and methodology, click on [GAO-08-96T](#). For more information, contact Lisa Shames, (202) 512-3841 or shamesl@gao.gov.

AGRICULTURAL QUARANTINE INSPECTION PROGRAM

Management Problems May Increase Vulnerability of U.S. Agriculture to Foreign Pests and Diseases

What GAO Found

CBP and APHIS have taken steps intended to strengthen the AQI program since transfer of inspection responsibilities from USDA to DHS in March 2003. Specifically, CBP and APHIS have expanded the hours and developed a national standard for agriculture training; given agricultural specialists access to a computer system that is to better target inspections at ports; and established a joint review process for assessing compliance with the AQI program on a port-by-port basis. In addition, CBP has created new agricultural liaison positions at the field office level to advise regional port directors on agricultural issues. We have not assessed the implementation and effectiveness of these actions.

However, GAO's survey of CBP agriculture specialists found that many believed the agriculture inspection mission had been compromised by the transfer. Although 86 percent of agriculture specialists reported feeling very well or somewhat prepared for their duties, 59 and 60 percent of specialists answered that they were conducting fewer inspections and interceptions, respectively, of prohibited agricultural items since the transfer. When asked what is going well with respect to their work, agriculture specialists identified working relationships (18 percent), nothing (13 percent), salary and benefits (10 percent), training (10 percent), and general job satisfaction (6 percent). When asked what areas should be changed or improved, they identified working relationships (29 percent), priority given to the agriculture mission (29 percent), problems with the CBP chain of command (28 percent), training (19 percent), and inadequate equipment and supplies (17 percent). Based on private and public sector experiences with mergers, these morale issues are not unexpected because employees often worry about their place in the new organization.

CBP must address several management problems to reduce the vulnerability of U.S. agriculture to foreign pests and diseases. Specifically, as of May 2006, CBP had not used available inspection and interception data to evaluate the effectiveness of the AQI program. CBP also had not developed sufficient performance measures to manage and evaluate the AQI program. CBP's measures focused on only two pathways by which foreign pests and diseases may enter the country and pose a threat to U.S. agriculture. However, in early 2007, CBP initiated new performance measures to track interceptions of pests and quarantine materials at ports of entry. We have not assessed the effectiveness of these measures. In addition, CBP has allowed the agricultural canine program to deteriorate, including reductions in the number of canine teams and their proficiency. Lastly, CBP had not developed a risk-based staffing model for determining where to assign agriculture specialists. Without such a model, CBP did not know whether it had an appropriate number of agriculture specialists at each port. Subsequent to our review, CBP developed a model. As of mid-August 2007, CBP had 2,116 agriculture specialists on staff, compared with 3,154 specialists needed, according to the staffing model.

Mr. Chairman and Members of the Subcommittee:

We are pleased to be here to discuss our work on the agricultural quarantine inspection (AQI) program. Under the AQI program, international passengers and cargo are inspected at U.S. ports of entry to seize prohibited material and intercept foreign agricultural pests. The AQI program is the first line of defense for agriculture, which is the largest industry and employer in the United States, generating more than \$1 trillion in economic activity annually. The entry of foreign pests and diseases can harm this important sector of our economy, the environment, plant and animal health, the food supply, and public health. The U.S. Department of Agriculture (USDA) estimates that foreign pests and diseases cost the American economy tens of billions of dollars annually in lower crop values, eradication programs, and emergency payments to farmers. The terrorist attacks of September 11, 2001 heightened concerns about agriculture's vulnerability to terrorism, including the deliberate introduction of livestock, poultry, and crop diseases, such as foot-and-mouth disease or avian influenza.

The Homeland Security Act of 2002 transferred responsibility for agricultural quarantine inspections from USDA to the Department of Homeland Security's (DHS) Customs and Border Protection (CBP) effective in March 2003, but left certain other agricultural quarantine responsibilities with USDA's Animal and Plant Health Inspection Service (APHIS). APHIS's responsibilities are to set agriculture inspection policy, provide related training, and collect AQI user fees. Beginning in March 2003, more than 1,800 agriculture specialists who had formerly reported to USDA became CBP employees, as CBP incorporated the protection of U.S. agriculture into its primary anti-terrorism mission. In addition to protecting U.S. agriculture and other functions, CBP's mission is to detect and prevent terrorists and their weapons from entering the United States, interdict illegal drugs and other contraband, and apprehend individuals who are attempting to enter the United States illegally. CBP faces a daunting task in protecting U.S. agriculture from accidental or deliberate introduction of diseases or pests, while attending to these missions.

After examining concerns that the transfer of agricultural inspections to CBP could shift the focus away from agriculture to CBP's other mission priorities, we reported in May 2006 on the coordination between USDA and DHS and made several recommendations to help ensure that U.S.

agriculture is protected from accidentally or intentionally introduced pests and diseases.¹ USDA and DHS generally agreed with the report's recommendations. In preparing this report, we surveyed a representative sample of CBP's agriculture specialists on their work experiences before and after the transfer and included the responses to the survey's 31 multiple-choice questions in the report.² The survey also asked two open-ended questions: (1) What is going well with respect to your work as an agriculture specialist? and (2) What would you like to see changed or improved with respect to your work as an agriculture specialist? In November 2006, we separately reported on the common themes in the narrative responses.³ My testimony today is based on these two reviews. We conducted the reviews from April 2005 through October 2006 in accordance with generally accepted government auditing standards.

This morning I will focus on three key findings:

- CBP and APHIS have taken steps intended to strengthen the AQI program since the transfer of inspection responsibilities from USDA to DHS following passage of the Homeland Security Act of 2002. CBP and APHIS have expanded the hours of agricultural training for CBP officers and developed a national standard for this training; given agriculture specialists access to CBP's Automated Targeting System to focus inspections on higher-risk passengers and cargo; and established a joint review process for assessing compliance with the AQI program on a port-by-port basis. Lastly, CBP has created new agricultural liaison positions at the field office level to advise regional port directors on agricultural issues. We have not assessed the implementation and effectiveness of these actions.

¹GAO, *Homeland Security: Management and Coordination Problems Increase the Vulnerability of U.S. Agriculture to Foreign Pests and Disease*, [GAO-06-644](#) (Washington, D.C.: May 19, 2006).

²Specifically, we drew a random probability sample of 831 agriculture specialists from the approximately 1,800 specialists (current as of Oct. 14, 2005) in CBP. In general, strata were defined by the number of specialists at the respective ports. We conducted a web-based survey of all specialists in the sample. Each sampled specialist was subsequently weighted in the analysis to account statistically for all specialists in the population. Thus, the percentages given for each question or theme can be generalized to the entire population of CBP agriculture specialists and are estimates (at the 95 percent confidence level). We received a response rate of 76 percent.

³GAO, *Homeland Security: Agriculture Specialists' Views of Their Work Experiences After Transfer to DHS*, [GAO-07-209R](#) (Washington, D.C.: Nov. 14, 2006).

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- Our survey of CBP agriculture specialists found that many believe the agriculture inspection mission has been compromised by the transfer. Although 86 percent of agriculture specialists reported feeling very well prepared or somewhat prepared for their duties, 59 and 60 percent of specialists answered that they were conducting fewer inspections and interceptions, respectively, of prohibited agricultural items since the transfer. When asked what is going well with respect to their work, agriculture specialists identified working relationships (18 percent), nothing (13 percent), salary and benefits (10 percent), training (10 percent), and general job satisfaction (6 percent). When asked what areas should be changed or improved, they identified working relationships (29 percent), priority given to the agriculture mission (29 percent), problems with the CBP chain of command (28 percent), training (19 percent), and inadequate equipment and supplies (17 percent). Agriculture specialists typically provided more examples or went into greater detail in answering these questions and submitted 185 pages of comments about what needs improvement—roughly 4 times more than their responses about what was going well. Based on private and public sector experiences with mergers, these morale issues are not unexpected because employees often worry about their place in the new organization.
 - CBP must address several management challenges to reduce the vulnerability of U.S. agriculture to foreign pests and diseases. Specifically, as of our May 2006 report, CBP had not used available inspection and interception data to evaluate the effectiveness of the AQI program, although the agency told us it has subsequently taken some steps—such as publishing monthly reports on inspections, arrivals, and seizures of various prohibited items, including agricultural quarantine material and pest interceptions—that we have not evaluated. Moreover, at the time of our May 2006 review, CBP had not developed sufficient performance measures to manage and evaluate the AQI program. CBP's measures focused only on two pathways—the percentage of (1) international air passengers and (2) border vehicle passengers that comply with AQI regulations—by which foreign pests and diseases may enter the country, but did not consider other important pathways such as commercial aircraft, vessels, and truck cargo that may pose a risk to U.S. agriculture. In early 2007, a joint team from CBP and APHIS agreed to implement additional performance measures for AQI activities in all major pathways at ports of entry. Some of these measures were implemented in fiscal year 2007; others are planned for fiscal years 2008 and 2009. However, we have not evaluated the adequacy of these new measures for assessing the AQI program's effectiveness at intercepting foreign pests and diseases. In addition, CBP has allowed the agriculture canine program to deteriorate, with fewer canine teams and declining proficiency scores. In the past,

these dogs have been a key tool for targeting passengers and cargo for detailed inspections. Lastly, CBP does not have the agriculture specialists needed to perform its AQI responsibilities based on its staffing model. Specifically, as of mid-August 2007, CBP said it had 2,116 agriculture specialists on staff, compared to 3,154 specialists needed, according to the model.

CBP and APHIS Have Taken Steps Intended to Strengthen the AQI Program

CBP and APHIS have taken four major steps intended to strengthen the AQI program since the transfer of responsibilities following passage of the Homeland Security Act of 2002. To date, we have not done work to assess the implementation and effectiveness of these actions.

First, CBP and APHIS expanded the hours of training on agricultural issues for CBP officers, whose primary duty is customs and immigration inspection, and for CBP agriculture specialists, whose primary duty is agricultural inspection. Specifically, newly hired CBP officers receive 16 hours of training on agricultural issues, whereas before the transfer to CBP, customs inspectors received 4 hours of agricultural training, and immigration inspectors received 2 hours. CBP and APHIS also expanded agriculture training for CBP officers at their respective ports of entry to help them make better-informed decisions on agricultural items at high-volume border traffic areas. Additionally, CBP and APHIS have standardized the in-port training program and have developed a national standard for agriculture specialists with a checklist of activities for agriculture specialists to master. These activities are structured into an 8-week module on passenger inspection procedures and a 10-week module on cargo inspection procedures. Based on our survey of agriculture specialists, we estimate that 75 percent of specialists hired by CBP believe that they received sufficient training (on the job and at the Professional Development Center) to enable them to perform their agriculture inspection duties.⁴

Second, CBP and APHIS have taken steps designed to better target shipments and passengers that potentially present a high risk to U.S. agriculture. Specifically, some CBP agriculture specialists received training and were given access to CBP's Automated Targeting System, a computer system that, among other things, is designed to focus limited inspection resources on higher-risk passengers and cargo and facilitate

⁴The full survey results are available in appendix II of [GAO-06-644](#).

expedited clearance or entry for low-risk passengers and cargo. This system gives agriculture specialists detailed information from cargo manifests and other documents that shipping companies are required to submit before the ship arrives in a port to help them select high-risk cargo for inspection. CBP and APHIS headquarters personnel also use this information to identify companies that had previously violated U.S. quarantine laws. For example, according to a senior APHIS official, the two agencies used this system to help identify companies that have used seafood containers to smuggle uncooked poultry products from Asia, which are currently banned because of concerns over avian influenza.

Third, CBP and APHIS established a formal assessment process intended to ensure that ports of entry carry out agricultural inspections in accordance with the agricultural quarantine inspection program's regulations, policies, and procedures. The process, called Joint Agency Quality Assurance Reviews, covers topics such as (1) CBP coordination with other federal agencies; (2) agriculture specialist training; (3) specialist access to regulatory manuals; and (4) specialist adherence to processes for handling violations at the port, inspecting passenger baggage and vehicles, and intercepting, seizing, and disposing of confiscated materials. The reviews address best practices and deficiencies at each port and make recommendations for corrective actions to be implemented within 6 weeks. For example, regarding best practices, a review of two ports found that the placement of CBP, APHIS, and Food and Drug Administration staff in the same facility enhanced their coordination. This review also lauded their targeting of non-agricultural products that are packed with materials, such as wood, that may harbor pests or diseases that could pose a risk to U.S. agriculture. Regarding deficiencies, this review found that the number of CBP agriculture specialists in each port was insufficient, and that the specialists at one of the ports were conducting superficial inspections of commodities that should have been inspected more intensely. According to CBP, the agency took actions to correct these deficiencies, although we have not evaluated those actions. In September 2007, CBP said that the joint review team had conducted 13 reviews in fiscal years 2004 through 2006, and 7 reviews were completed or underway for fiscal year 2007. Seven additional reviews are planned for fiscal year 2008.

Lastly, in May 2005, CBP required each director in its 20 district field offices to appoint an agriculture liaison, with background and experience as an agriculture specialist, to provide CBP field office directors with agriculture-related input for operational decisions and agriculture specialists with senior-level leadership. The agriculture liaisons are to,

among other things, advise the director of the field office on agricultural functions; provide oversight for data management, statistical analysis, and risk management; and coordinate agriculture inspection alerts. CBP officials told us that all district field offices had established the liaison position as of January 2006. Since the creation of the position, agriculture liaisons have facilitated the dissemination of urgent alerts from APHIS to CBP. They also provide information back to APHIS. For example, following a large increase in the discovery of plant pests at a port in November 2005, the designated agriculture liaison sent notice to APHIS, which then issued alerts to other ports. APHIS and CBP subsequently identified this agriculture liaison as a contact for providing technical advice for inspecting and identifying this type of plant pest.

Many Agriculture Specialists Believe that the Agricultural Mission Has Been Compromised

In fiscal year 2006, we surveyed a representative sample of CBP agriculture specialists regarding their experiences and opinions since the transfer of the AQI program from APHIS to CBP.⁵ In general, the views expressed by these specialists indicate that they believe that the agricultural inspection mission has been compromised. We note that morale issues are not unexpected in a merger such as the integration of the AQI mission and staff into CBP's primary anti-terrorism mission. GAO has previously reported on lessons learned from major private and public sector experiences with mergers that DHS could use when combining its various components into a unified department.⁶ Among other things, productivity and effectiveness often decline in the period following a merger, in part because employees often worry about their place in the new organization.

Nonetheless, based on the survey results, while 86 percent of specialists reported feeling very well or somewhat prepared for their duties as an agriculture specialist, many believed that the agriculture mission had been compromised by the transfer. Specifically,

⁵The survey was available from November 15, 2005, until January 9, 2006.

⁶GAO, *Mergers and Transformation: Lessons Learned for a Department of Homeland Security and Other Federal Agencies*, [GAO-03-293SP](#) (Washington, D.C.: Nov. 14, 2002) and *Results-Oriented Cultures: Implementation Steps to Assist Mergers and Organizational Transformations*, [GAO-03-669](#) (Washington, D.C.: July 2, 2003).

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- 59 percent of experienced specialists indicated that they are doing either somewhat or many fewer inspections since the transfer, and 60 percent indicated that they are doing somewhat or many fewer interceptions.
 - 63 percent of agriculture specialists believed their port did not have enough specialists to carry out agriculture-related duties.
 - Agriculture specialists reported that they spent 62 percent of their time on agriculture inspections, whereas 35 percent of their time was spent on non-agricultural functions such as customs and immigration inspections.

In addition, there appear to be morale issues based on the responses to two open-ended questions: (1) What is going well with respect to your work as an agriculture specialist? and (2) What would you like to see changed or improved with respect to your work as an agriculture specialist? Notably, the question about what needs improving generated a total of 185 pages of comments—roughly 4 times more than that generated by the responses to our question on what was going well. Further, “Nothing is going well” was the second-most frequent response to the question on what is going well.

We identified common themes in the agriculture specialists’ responses to our first question about what is going well with respect to their work as an agriculture specialist. The five most common themes were:

- Working relationships. An estimated 18 percent of agriculture specialists cited the working relationship among agriculture specialists and CBP officers and management as positive. These specialists cited increasing respect and interest by non-specialists in the agriculture mission, and the attentiveness of CBP management to agriculture specialists’ concerns.
- Nothing. An estimated 13 percent of agriculture specialists reported that nothing is going well with their work. For example, some respondents noted that the agriculture inspection mission has been compromised under CBP and that agriculture specialists are no longer important or respected by management.
- Salary and Benefits. An estimated 10 percent of agriculture specialists expressed positive comments about their salary and benefits, with some citing increased pay under CBP, a flexible work schedule, increased overtime pay, and retirement benefits as reasons for their views.
- Training. An estimated 8 percent of agriculture specialists identified elements of classroom and on-the-job training as going well. Some

observed that new hires are well trained and that agriculture-related classroom training at the Professional Development Center in Frederick, Maryland, is adequate for their duties.

- General job satisfaction. An estimated 6 percent of agriculture specialists were generally satisfied with their jobs, reporting, among other things, that they were satisfied in their working relationships with CBP management and coworkers and that they believed in the importance of their work in protecting U.S. agriculture from foreign pests and diseases.

In contrast, agriculture specialists wrote nearly 4 times as much in response to our question about what they would like to see changed or improved with respect to their work as agriculture specialists. In addition, larger proportions of specialists identified each of the top five themes.

- Declining mission. An estimated 29 percent of agriculture specialists were concerned that the agriculture mission is declining because CBP has not given it adequate priority. Some respondents cited the increase in the number of cargo items and flights that are not inspected because of staff shortages, scheduling decisions by CBP port management, and the release of prohibited or restricted products by CBP officers.
- Working relationships. An estimated 29 percent of the specialists expressed concern about their working relationships with CBP officers and management. Some wrote that CBP officers at their ports view the agriculture mission as less important than CBP's other priorities, such as counternarcotics and anti-terrorism activities. Others noted that CBP management is not interested in, and does not support, agriculture inspections.
- CBP chain of command. An estimated 28 percent of agriculture specialists identified problems with the CBP chain of command that impede timely actions involving high-risk interceptions, such as a lack of managers with an agriculture background and the agency's rigid chain-of-command structure. For example, agriculture specialists wrote that requests for information from USDA pest identification experts must be passed up the CBP chain of command before they can be conveyed to USDA.
- Training. An estimated 19 percent of agriculture specialists believed that training in the classroom and on the job is inadequate. For example, some respondents expressed concern about a lack of courses on DHS's targeting and database systems, which some agriculture specialists use to target high-risk shipments and passengers. Also, some agriculture specialists wrote that on-the-job training at their ports is poor, and that CBP officers

do not have adequate agriculture training to recognize when to refer items to agriculture specialists for inspection.

- Lack of equipment. An estimated 17 percent of agriculture specialists were concerned about a lack of equipment and supplies. Some respondents wrote that the process for purchasing items under CBP results in delays in acquiring supplies and that there is a shortage of agriculture-specific supplies, such as vials, gloves, and laboratory equipment.

These themes are consistent with responses to relevant multiple-choice questions in the survey. For example, in response to one of these questions, 61 percent of agriculture specialists believed their work was not respected by CBP officers, and 64 percent believed their work was not respected by CBP management.

Management Problems May Leave U.S. Agriculture Vulnerable to Foreign Pests and Diseases

Although CBP and APHIS have taken a number of actions intended to strengthen the AQI program since its transfer to CBP, several management problems remain that may leave U.S. agriculture vulnerable to foreign pests and diseases. Most importantly, CBP has not used available data to evaluate the effectiveness of the program. These data are especially important in light of many agriculture specialists' views that the agricultural mission has been compromised and can help CBP determine necessary actions to close any performance gaps. Moreover, at the time of our May 2006 review, CBP had not developed sufficient performance measures to manage and evaluate the AQI program, and the agency had allowed the agricultural canine program to deteriorate. Furthermore, based on its staffing model, CBP does not have the agriculture specialists needed to perform its AQI responsibilities.

CBP has not used available data to monitor changes in the frequency with which prohibited agricultural materials and reportable pests are intercepted during inspection activities. CBP agriculture specialists record monthly data in the Work Accomplishment Data System for each port of entry, including (1) arrivals of passengers and cargo to the United States via airplane, ship, or vehicle; (2) agricultural inspections of arriving passengers and cargo; and (3) inspection outcomes, i.e., seizures or detections of prohibited (quarantined) agricultural materials and reportable pests. As of our May 2006 report, CBP had not used these data to evaluate the effectiveness of the AQI program.

For example, our analysis of the data for the 42 months before and 31 months after the transfer of responsibilities from APHIS to CBP shows

that average inspection and interception rates have changed significantly in some geographical regions of the United States, with rates increasing in some regions and decreasing in others. (Appendixes I and II provide more information on average inspection and interception rates before and after the transfer from APHIS to CBP.) Specifically, average inspection rates declined significantly in the Baltimore, Boston, Miami, and San Francisco district field offices, and in preclearance locations in Canada, the Caribbean, and Ireland. Inspection rates increased significantly in seven other districts—Buffalo, El Paso, Laredo, San Diego, Seattle, Tampa, and Tucson. In addition, the average rate of interceptions decreased significantly at ports in six district field offices—El Paso, New Orleans, New York, San Juan, Tampa, and Tucson—while average interception rates have increased significantly at ports in the Baltimore, Boston, Detroit, Portland, and Seattle districts.

Of particular note are three districts that have experienced a significant *increase* in their rate of inspections and a significant *decrease* in their interception rates since the transfer. Specifically, since the transfer, the Tampa, El Paso, and Tucson districts appear to be more efficient at inspecting (e.g., inspecting a greater proportion of arriving passengers or cargo) but less effective at interceptions (e.g., intercepting fewer prohibited agricultural items per inspection). Also of concern are three districts—San Juan, New Orleans, and New York—that are inspecting at about the same rate, but intercepting less, since the transfer.

When we showed the results of our analysis to senior CBP officials, they were unable to explain these changes or determine whether the current rates were appropriate relative to the risks, staffing levels, and staff expertise associated with individual districts or ports of entry. These officials also noted that CBP has had problems interpreting APHIS data reports because CBP lacked staff with expertise in agriculture and APHIS's data systems in some district offices. As of our May 2006 report, CBP had not yet completed or implemented its plan to add agriculture-related data to its system for monitoring customs inspections. However, in September 2007, CBP said it had taken steps to use these data to evaluate the program's effectiveness. For example, CBP publishes a monthly report that includes analysis of efficiency inspections, arrivals, exams, and seizures of prohibited items, including agricultural quarantine material and pest interceptions, for each pathway. CBP also conducts a mid-year analysis of APHIS and CBP data to assess agricultural inspection efficiency at ports of entry. While these appear to be positive steps, we have not assessed their adequacy to measure the AQI program's effectiveness.

A second management problem for the AQI program is an incomplete set of performance measures to balance multiple responsibilities and demonstrate results. As of our May 2006 report, CBP had not developed and implemented its own performance measures for the program. Instead, according to CBP officials, CBP carried over two measures that APHIS had used to assess the AQI program before the transfer: the percentages of international air passengers and border vehicle passengers that comply with program regulations. However, these measures addressed only two pathways for agricultural pests, neglecting other pathways such as commercial aircraft, vessels, and truck cargo. Further, these performance measures did not provide information about changes in inspection and interception rates, which could help assess the efficiency and effectiveness of agriculture inspections in different regions of the country or at individual ports of entry. They also did not address the AQI program's expanded mission—to prevent agro-terrorism while facilitating the flow of legitimate trade and travel. In early 2007, a joint team from CBP and APHIS agreed to implement additional performance measures for AQI activities in all major pathways at ports of entry. Specifically, CBP said that in fiscal year 2007 it implemented measures for the percentages of land border, air, and maritime regulated cargo and shipments in compliance with AQI regulations. Furthermore, the agency plans to add additional performance measures such as percentage of passengers, vehicles, or mail in compliance in fiscal years 2008 and 2009. However, we have not evaluated the adequacy of these new performance measures for assessing the AQI program's effectiveness at intercepting foreign pests and diseases.

Third, the number and proficiency of canine teams decreased substantially between the time of the transfer, March 2003, and the time of our review, May 2006. In the past, these dogs have been a key tool for targeting passengers and cargo for detailed inspections. Specifically, APHIS had approximately 140 canine teams nationwide at the time of the transfer, but CBP had only 80 such teams at the time of our review. With regard to proficiency, 60 percent of the 43 agriculture canine teams tested by APHIS in 2005 failed proficiency tests. These tests require the dog to respond correctly in a controlled, simulated work environment and ensure that dogs are working effectively to catch potential prohibited agricultural material. In general, canine specialists we interviewed expressed concern that the proficiency of their dogs was deteriorating due to a lack of working time. That is, the dogs were sidelined while the specialists were assigned to other duties. In addition, based on our survey results, 46 percent of canine specialists said they were directed to perform duties outside their primary canine duties daily or several times a week.

Furthermore, 65 percent of canine specialists indicated that they sometimes or never had funding for training supplies. Another major change to the canine program, following the transfer, was CBP's elimination of all canine management positions.

Finally, based on its staffing model, CBP lacks adequate numbers of agriculture specialists to accomplish the agricultural mission. The Homeland Security Act authorized the transfer of up to 3,200 AQI personnel from USDA to DHS. In March 2003, APHIS transferred a total of 1,871 agriculture specialist positions, including 317 vacancies, to CBP and distributed those positions across CBP's 20 district field offices, encompassing 139 ports of entry. Because of the vacancies, CBP lacked adequate numbers of agriculture specialists from the beginning and had little assurance that appropriate numbers of specialists were staffed at each port of entry. Although CBP has made some progress in hiring agriculture specialists since the transfer, we previously reported that CBP lacked a staffing model to ensure that more than 630 newly hired agriculture specialists were assigned to the ports with the greatest need, and to ensure that each port had at least some experienced specialists. Accordingly, in May 2006 we recommended that APHIS and CBP work together to develop a national staffing model to ensure that agriculture staffing levels at each port are sufficient. Subsequently, CBP developed a staffing model for its ports of entry and provided GAO with its results. Specifically, as of mid-August 2007, CBP said it had 2,116 agriculture specialists on staff, compared to 3,154 such specialists needed according to the model.

Conclusions

The global marketplace of agricultural trade and international travel has increased the number of pathways for the movement and introduction into the United States of foreign and invasive agricultural pests and diseases such as foot-and-mouth disease and avian influenza. Given the importance of agriculture to the U.S. economy, ensuring the effectiveness of federal programs to prevent accidental or deliberate introduction of potentially destructive organisms is critical. Accordingly, effective management of the AQI program is necessary to ensure that agriculture issues receive appropriate attention. Although we have reported that CBP and APHIS have taken steps to strengthen agricultural quarantine inspections, many agriculture specialists believe that the agricultural mission has been compromised. While morale issues, such as the ones we identified, are to be expected in the merger establishing DHS, CBP had not used key data to evaluate the program's effectiveness and could not explain significant increases and decreases in inspections and interceptions. In addition, CBP

had not developed performance measures to demonstrate that it is balancing its multiple mission responsibilities, and it does not have sufficient agriculture specialists based on its staffing model. Until the integration of agriculture issues into CBP's overall anti-terrorism mission is more fully achieved, U.S. agriculture may be left vulnerable to the threat of foreign pests and diseases.

Mr. Chairman, this concludes my prepared statement. I would be happy to respond to any questions that you or Members of the Subcommittee may have at this time.

Contact and Staff Acknowledgments

Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. For further information about this testimony, please contact Lisa Shames at (202) 512-3841 or shamesl@gao.gov. Key contributors to this testimony were James Jones, Jr., Assistant Director, and Terrance Horner, Jr. Josey Ballenger, Kevin Bray, Chad M. Gorman, Lynn Musser, Omari Norman, Alison O'Neill, and Steve C. Rossman also made important contributions.

Appendix I: Average Inspection Rates Before and After the Transfer From APHIS to CBP

Table 1: Average Inspection Rates before and after the Transfer from APHIS to CBP

District field office	Average inspection rate before (October 1999-February 2003)	Average inspection rate after (March 2003-September 2005)	Difference ^a	Statistical significance ^b
Atlanta	9.7	8.8	-0.9	No
Baltimore	18.2	10.0	-8.2	Yes
Boston	30.9	13.0	-17.9	Yes
Buffalo	0.1	0.5	0.3	Yes
Chicago	18.0	18.5	0.5	No
Detroit	3.1	2.9	-0.2	No
El Paso	2.9	4.4	1.5	Yes
Houston	13.2	12.1	-1.1	No
Laredo	7.7	8.8	1.1	Yes
Los Angeles	12.5	10.4	-2.1	No
Miami	35.8	23.1	-12.7	Yes
New Orleans	37.6	41.8	4.3	No
New York	12.0	11.8	-0.2	No
Preclearance ^c	7.8	3.4	-4.4	Yes
Portland	13.0	12.6	-0.4	No
San Diego	12.6	16.3	3.6	Yes
San Francisco	40.4	19.0	-21.4	Yes
San Juan	62.4	57.6	-4.8	No
Seattle	2.3	3.1	0.8	Yes
Tampa	19.6	30.7	11.1	Yes
Tucson	2.6	4.0	1.4	Yes

Source: GAO calculations of APHIS's Work Accomplishment Data System, fiscal years 2000 through 2005.

^aBecause of rounding, values in the difference column may not equal the difference between rounded inspection rates.

^bStatistical significance for each field office was calculated at the 99.75 percent confidence level so that the confidence level of all 21 statistical significance outcomes, collectively, is about 95 percent.

^cPreclearance inspections were conducted at 14 locations in Canada, the Caribbean, and Ireland. Individuals arriving in the U.S. from those locations did not undergo another inspection upon arrival in the United States. According to CBP, preclearance inspections were done only as a pilot and not as an ongoing program within the agency.

Appendix II: Average Interception Rates Before and After the Transfer From APHIS to CBP

Table 2: Average Interception Rates before and after the Transfer from APHIS to CBP

District field office	Average interception rate before (October 1999-February 2003)	Average interception rate after (March 2003-September 2005)	Difference ^a	Statistical significance ^b
Atlanta	10.7	11.5	0.8	No
Baltimore	7.6	10.4	2.8	Yes
Boston	3.9	12.4	8.5	Yes
Buffalo	15.4	30.2	14.8	No
Chicago	6.8	5.6	-1.3	No
Detroit	7.7	20.7	13.0	Yes
El Paso	9.4	5.7	-3.7	Yes
Houston	7.9	8.4	0.4	No
Laredo	4.4	3.9	-0.5	No
Los Angeles	7.4	8.7	1.3	No
Miami	5.3	5.8	0.4	No
New Orleans	5.9	3.5	-2.4	Yes
New York	18.1	10.2	-7.9	Yes
Preclearance ^c	10.1	24.4	14.2	Yes
Portland	9.6	14.9	5.3	Yes
San Diego	1.3	1.4	0.2	No
San Francisco	10.5	10.6	0.1	No
San Juan	6.1	3.5	-2.5	Yes
Seattle	30.1	46.5	16.4	Yes
Tampa	8.3	3.0	-5.2	Yes
Tucson	9.0	7.0	-2.0	Yes

Source: GAO calculations of APHIS's Work Accomplishment Data System, fiscal years 2000 through 2005.

^aBecause of rounding, values in the difference column may not equal the difference between rounded interception rates.

^bStatistical significance for each field office was calculated at the 99.75 percent confidence level so that the confidence level of all 21 statistical significance outcomes, collectively, is about 95 percent.

^cPreclearance inspections were conducted at 14 locations in Canada, the Caribbean, and Ireland. Individuals arriving in the United States from those locations did not undergo another inspection upon arrival in the United States. According to CBP, preclearance inspections were done only as a pilot and not as an ongoing program within the agency.

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