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REPORT TO THE CONGRESS ⁵
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**A Single Agency Needed To Manage
Port-Of-Entry Inspections--Particularly
At U.S. Airports** B-114898

Department of Justice
Department of the Treasury
Department of Agriculture
Department of Health, Education,
and Welfare

**BY THE COMPTROLLER GENERAL
OF THE UNITED STATES**

~~701550~~ **096347**

MAY 30, 1973



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-114898

C
To the President of the Senate and
Speaker of the House of Representatives

This is our report on the need for a single agency to manage port-of-entry inspections--particularly at U.S. airports.

Our review was made pursuant to the Budget and Accounting Act, 1921 (31 U.S.C. 53), and the Accounting and Auditing Act of 1950 (31 U.S.C. 67).

Copies of the report are being sent to the Director, Office of Management and Budget; the Attorney General; and the Secretaries of Health, Education, and Welfare; Agriculture; and the Treasury.

A handwritten signature in cursive script that reads "James B. Stacks".

Comptroller General
of the United States

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Principal Government officials responsible for administration of activities discussed in this report

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COMPTROLLER GENERAL'S
REPORT TO THE CONGRESS

A SINGLE AGENCY NEEDED TO MANAGE
PORT-OF-ENTRY INSPECTIONS--
PARTICULARLY AT U.S. AIRPORTS
Department of Justice
Department of the Treasury
Department of Agriculture
Department of Health, Education,
and Welfare
B-114898

D I G E S T

WHY THE REVIEW WAS MADE

Because the number of people entering the United States increases greatly each year, GAO reviewed the Federal inspection system, primarily at the John F. Kennedy International Airport, to determine how satisfactory it is and what should be done to meet the heavy workload that lies ahead.

FINDINGS AND CONCLUSIONS

By 1978 annual arrivals to the United States are expected to reach 274 million--an increase of 44 million in 8 years and about 30 percent more than the present U.S. population. Air arrivals alone are expected to increase from 14 million in 1970 to 33 million by 1978. (See p. 6.)

Four Federal agencies are responsible for inspecting persons entering the United States.

--The Public Health Service, Department of Health, Education, and Welfare, checks for required inoculations and apparent health.

--The Immigration and Naturalization

Service, Department of Justice, checks citizenship and determines admissability of aliens.

3 --The Bureau of Customs, Department of the Treasury, inspects baggage and assesses duty and taxes.

4 --The Animal and Plant Health Inspection Service, Department of Agriculture, inspects agricultural items, such as plants and meat.

At a time when inspection resources are strained by the increased number of arrivals, particularly at international airports, the situation is further aggravated by the uneven distribution of arrivals during both the day and the year. At the Kennedy airport, for example:

--Forty percent of the annual passenger traffic in a recent year arrived during July, August, and September.

--A major portion of the air arrivals during 1 week in that year landed between 2:00 p.m. and 8:00 p.m. each day. (See pp. 6, 7, 8, and 10.)

The increases in, and concentrations of, air arrivals and the four-way division of inspection functions

contribute to the following problems:

- The agencies must staff and supervise inspection operations at Kennedy at four separate locations. (See p. 9.)
- The agencies have different policies and procedures for establishing work shifts and billing airlines for services. (See p. 9.)
- The agencies have different pay scales for overtime which results in wide disparities in pay for inspectors performing similar work. (See p. 9.)
- At peak traffic periods, the pressure to quickly process arrivals dilutes the quality of the inspections. (See p. 9.)

An attempt to overcome these difficulties by consolidating inspections started in the 1940s on the Canadian border. In the early 1960s a similar effort was started on the Mexican border.

In late 1967 and early 1968, a task force, chaired by the Office of Management and Budget and including members of the four inspection agencies, concluded after examining the inspection system that one-stop inspections could be effective at international airports.

Under the one-stop system, one officer inspects arrivals for two or more agencies and receives specialized help at a secondary inspection station when necessary. (See p. 12.)

The system was tested at Kennedy airport due to the heavy air traffic expected during the summer of 1968.

Although this system did facilitate processing, local officials of the four agencies were highly critical of the quality of the inspections under the system. (See pp. 14 and 20.)

The one-stop system was halted in late 1970 when Customs withdrew its personnel from the primary inspection stations to deal more intensively with the administration's anti-drug-smuggling campaign. (See p. 20.)

In its final report in May 1968, just prior to the one-stop test, the task force observed that "the total inspection system is lacking direction, vitality, and responsiveness because of the divided responsibility among the four agencies."

The task force considered as inevitable the establishment of a single agency for all activities pertaining to the inspection of travelers and their baggage. (See p. 13.)

Attempts to improve the inspection system have been frustrated mainly because of the inherent difficulties of multi-agency cooperation.

The four agencies recognize that a fragmented approach to inspections will not allow a more efficient and effective inspection system to develop. Benefits of single-agency management include:

- Development of a single inspection system.
- Uniform administrative policies and procedures.
- Improved scheduling, planning, and coordination.
- Elimination of duplication.

--Reductions in space and staff requirements and inspection time.

RECOMMENDATION

1 The Director, Office of Management and Budget, in cooperation with the
2 Attorney General and the Secretaries
3 of Health, Education, and Welfare;
4 Agriculture; and the Treasury should
5 implement single-agency management
of port-of-entry inspections.

AGENCY ACTIONS AND UNRESOLVED ISSUES

On March 28, 1973, the President transmitted to the Congress Reorganization Plan No. 2 which will transfer the functions of the Immigration and Naturalization Service related to the inspection of persons and documents, and the related manpower, to the Bureau of Customs. This proposal would be a significant first step in eliminating the problems discussed.

In commenting on a draft of this report, the Office of Management and Budget said that after this transfer is completed the

possibilities for further improvement in the inspection process will be reviewed.

The Departments of Agriculture, Justice, and the Treasury agreed with GAO's recommendation.

The Department of Health, Education, and Welfare did not agree with the concept of single-agency management and emphasized that only experienced inspectors understanding disease epidemiology could adequately carry out epidemiological surveillance.

Single-agency management would not eliminate experienced judgment or expertise in a particular inspection function, such as epidemiological surveillance; it could still be accomplished by trained inspectors.

MATTERS FOR CONSIDERATION
BY THE CONGRESS

The President's Reorganization Plan No. 2 of 1973 would be an important step toward achieving single-agency management of port-of-entry inspections, especially at the U.S. international airports.

CHAPTER 1

INTRODUCTION

Four Federal agencies are responsible for inspecting entrants to the United States.

- Public Health Service, Department of Health, Education, and Welfare, checks for required inoculations and apparent health.
- Immigration and Naturalization Service, Department of Justice, checks citizenship and determines admissibility of aliens.
- Bureau of Customs, Department of the Treasury, inspects baggage, collects duties on imported merchandise, interdicts flow of narcotics and dangerous drugs, and combats smuggling of prohibited and restricted articles or smuggling of articles to avoid paying duties.
- Animal and Plant Health Inspection Service, Department of Agriculture, inspects agricultural items to keep out plant and animal disease and insect pests.

The inspections include observation, interview, examination of entry documents, and selective baggage inspection. The agencies estimated that in fiscal year 1972, 3,400 inspectors and personnel expenditures of \$52 million were required to carry out these inspections.

At a time when demands on inspection resources are constantly increasing, this division of labor has aggravated the agencies' capability to meet these demands. The agencies have tried periodically to improve their procedures.

SCOPE OF REVIEW

Our review of these improvement efforts was made primarily at John F. Kennedy International Airport. We also made inquiries at the Office of Management and Budget; at the headquarters offices of the Bureau of Customs, the Immigration and Naturalization Service, the Public Health Service, and the Animal and Plant Health Inspection Service; and at these agencies' New York City field offices.

CHAPTER 2

INSPECTION WORKLOADS AND PROBLEMS

Each year the number of arrivals into the United States increases enormously. By 1978 it should reach 274 million--an increase of 44 million in 8 years and about 30 percent more than the present population of the United States.

The dramatic growth of air travel is one reason for this expansion. Although about 85 percent of the expected arrivals (238 million) will arrive by land, the greatest proportionate increase will come by air. Annual arrivals by sea are expected to stabilize at the 1970 level of 3 million.

In 1970 international airports processed about 14 million arrivals. By 1978 that number should reach about 33 million, with a comparable increase in personal baggage. When expressed in terms of local operations, the scope of this expansion becomes clear:

- At Kennedy airport annual arrivals are expected to reach 5.7 million by the middle of the 1970s, an increase of almost 2 million persons in 5 years.
- At Miami International Airport annual arrivals are about 2 million, an increase of 1.1 million from 1970.
- At Honolulu annual arrivals are 700,000, an increase of 200,000 from 1970.
- At Chicago annual arrivals are 1.4 million, an increase of 600,000 from 1970.

The strain on these facilities has been aggravated by the uneven distribution of air arrivals during both the day and the year. At Kennedy airport, for example:

- Forty percent of the passenger traffic in 1970, or about 1.6 million persons, arrived during July, August, and September. (See fig. 1.)
- A major portion of the arrivals during 1 week in July 1970 landed between 2:00 p.m. and 8:00 p.m. each day. (See fig. 2.)

NUMBER OF AIR ARRIVALS, BY MONTH, DURING 1970

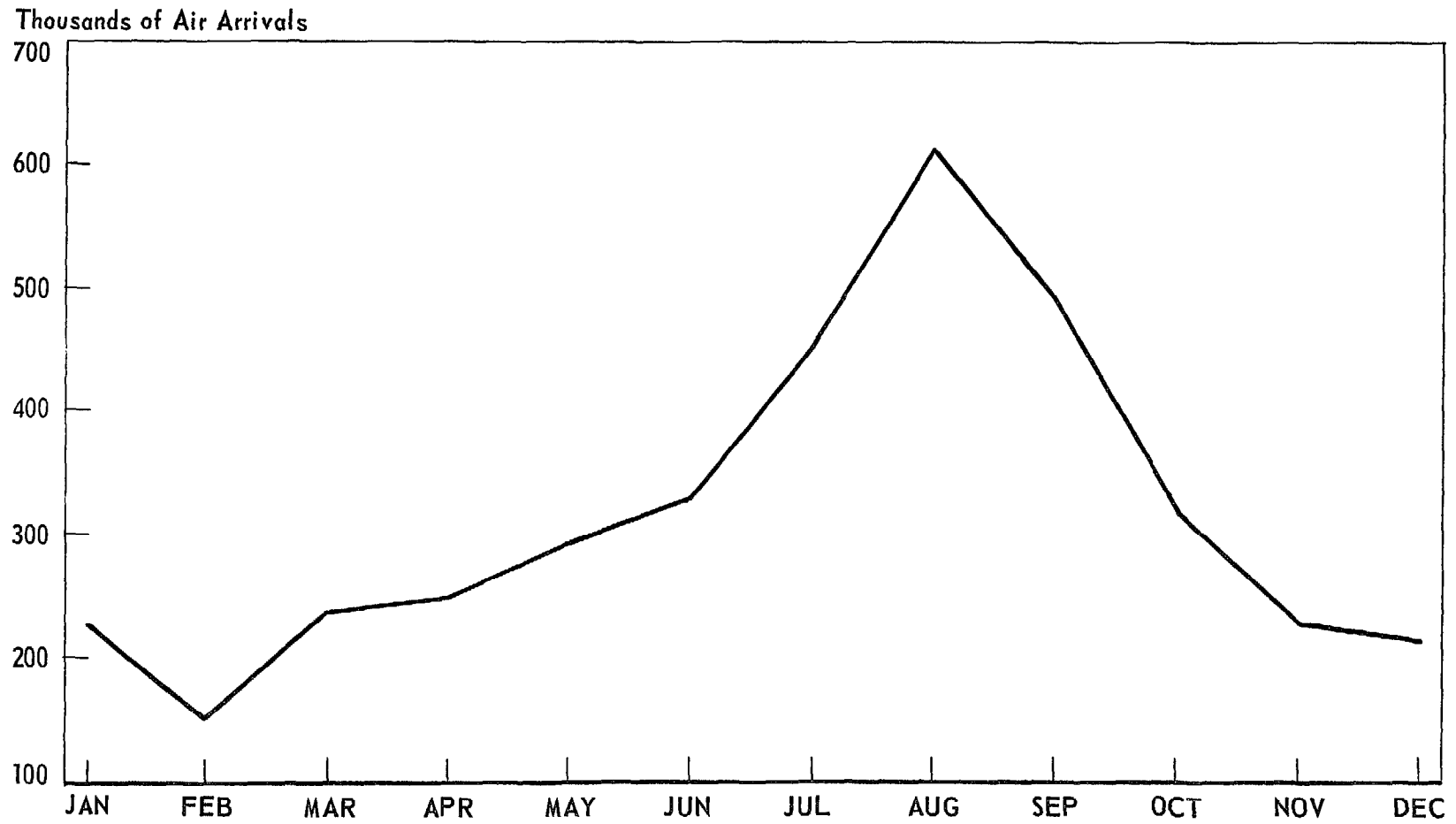


Figure 1

**NUMBER OF AIR ARRIVALS, BY HOUR, DURING ONE WEEK IN JULY 1970
(JOHN F. KENNEDY AIRPORT)**

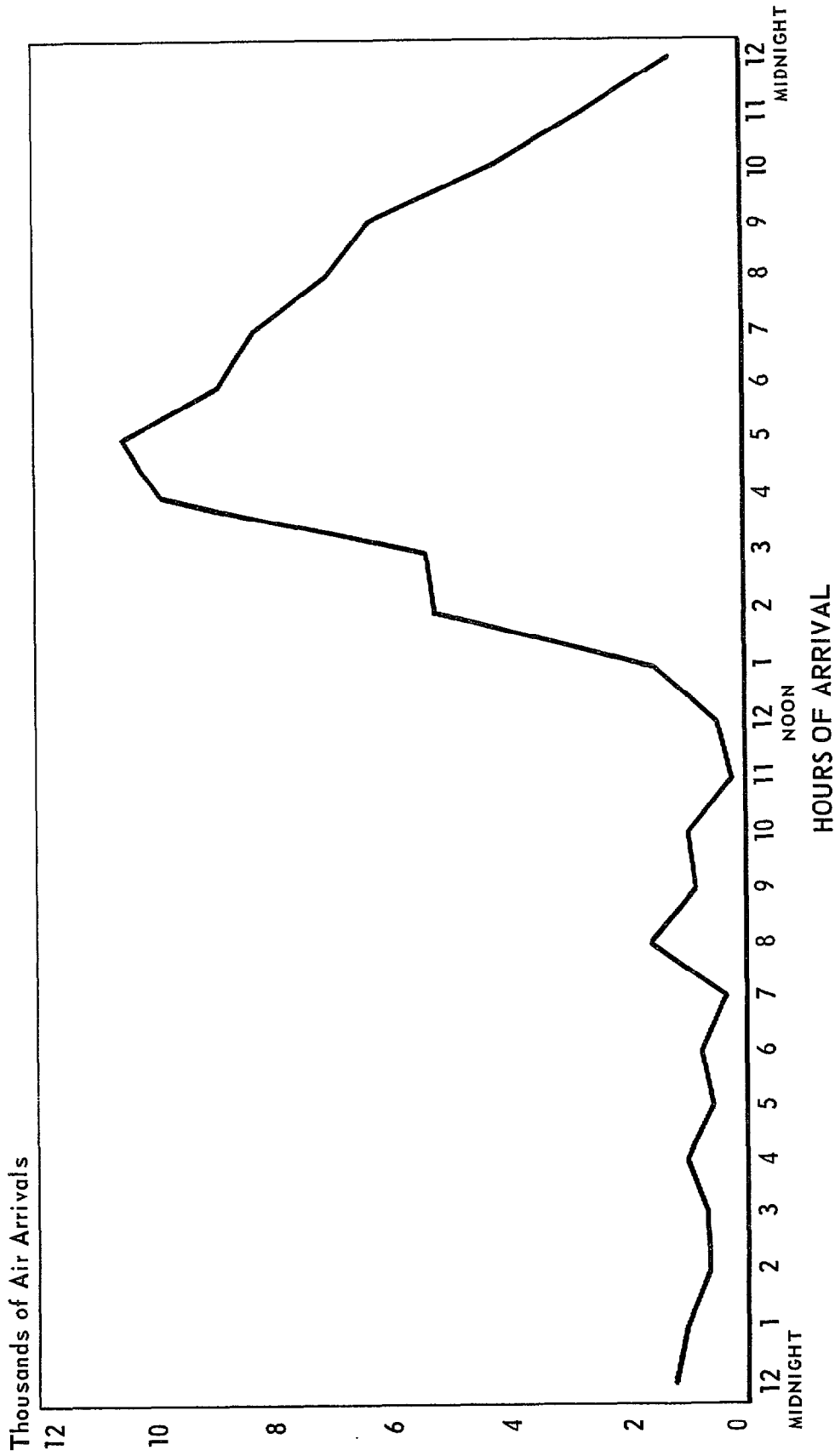


Figure 2

Due to the increase in arrivals, the inspection force at Kennedy airport has grown. In January 1970 about 200 inspectors and supervisors processed arrivals; by June 1972 the force had increased to about 260, a 30-percent growth in 17 months.

In addition to regularly assigned inspectors, 159 temporary inspectors were hired in the summer of 1972. Such inspectors are hired seasonally to meet the demands of peak traffic months. After brief training the temporary inspectors are assigned to regular inspection functions.

Until 1970 the International Arrivals Building at Kennedy airport was large enough to handle all arrivals. Since then three major airlines have built their own facilities to accommodate the increase in arrivals. The consequent need to staff and supervise inspection operations in four separate inspection areas places greater strains on the four inspection agencies' workforces. The following chart illustrates the increases in workload at the main and satellite terminals.

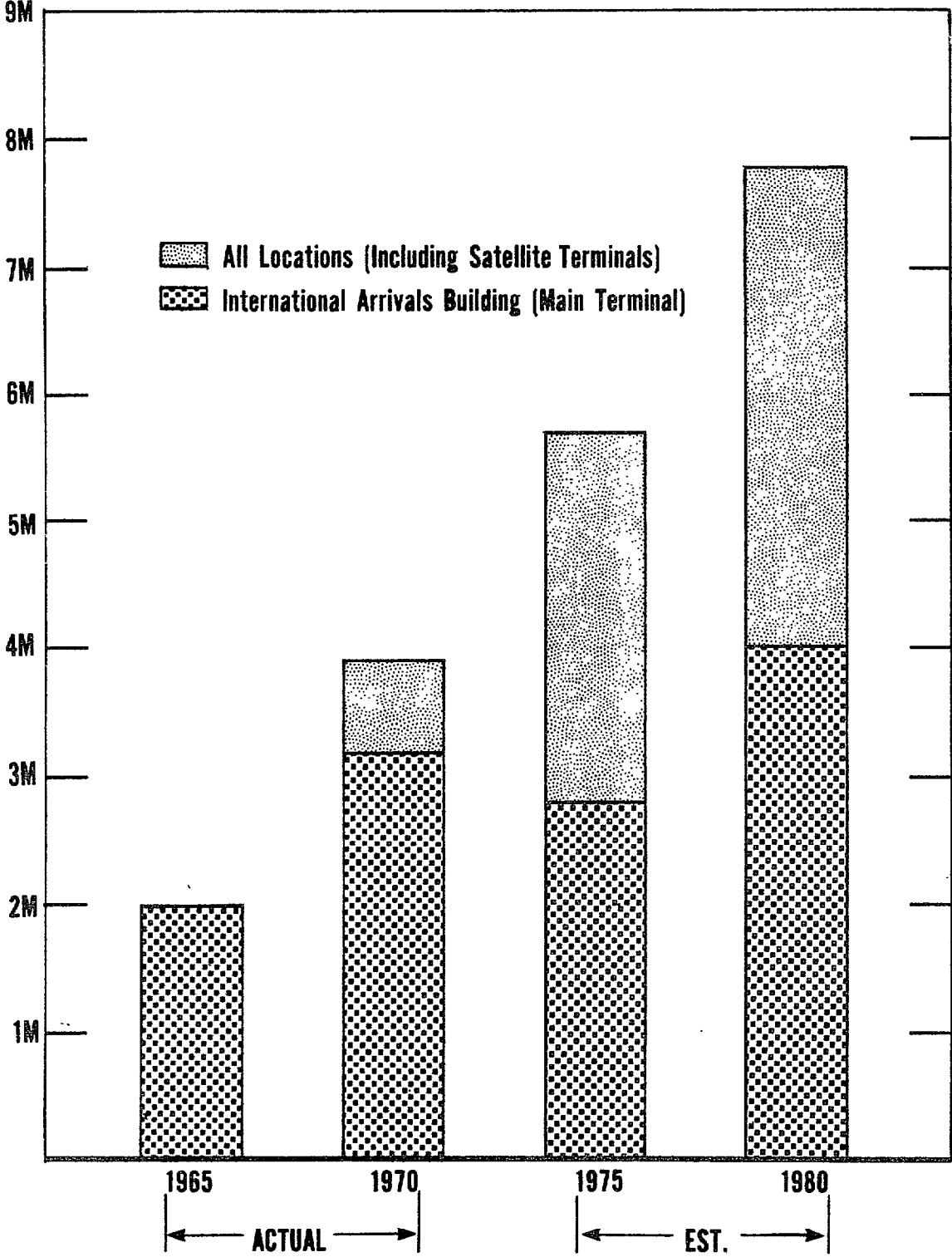
When necessary, the four agencies provide 24-hour inspection coverage. The four agencies' administrative practices concerning inspections vary widely. For example:

- Customs uses four overlapping 8-hour shifts each day. Immigration uses five overlapping 8-hour shifts. The Animal and Plant Inspection Service and the Public Health Service each use seven overlapping 8-hour shifts.
- Each agency's rules and pay scales for overtime differ. This results in wide disparities in pay for inspectors performing similar work.
- Each agency uses different criteria to determine whether air carriers will be charged for overtime costs.

The increase in the number of inspections at peak periods tends to dilute the quality of the individual inspections because the emphasis shifts from enforcing the law to expediting operations. This is illustrated in the following table.

INSPECTION WORKLOAD

MILLIONS OF PERSONS



Level of Selective Baggage Inspection

	<u>Number of passengers</u>		<u>Percentage inspected</u>
	<u>Total</u>	<u>Inspected</u>	
High traffic months 1971:			
August	480,364	96,583	20.1
September	364,222	73,217	20.1
October	269,551	42,695	15.8
Low and medium traffic months 1971 and 1972:			
November	191,348	46,329	24.2
December	183,849	50,858	27.7
January	244,449	67,256	27.5
February	192,308	56,325	29.3

CHAPTER 3

EFFORTS AT IMPROVEMENT

The present inspection system's deficiencies have been recognized for years. However, studies and proposals produced little improvement until March 1973.

GENERAL EFFORTS

Most recent efforts to simplify and consolidate inspection activities have involved a one-stop inspection system. Under this system one officer inspects arrivals for two or more agencies at a preliminary screening station. If the officer needs specialized help or if a baggage inspection is considered necessary, he directs arriving passengers to a secondary inspection station.

The most enduring use of the one-stop system has been at land border crossings where separate inspections were discontinued long ago. Starting in the 1940s, Customs and Immigration officers on the Canadian border inspected for both agencies after appropriate training. In the early 1960s, a similar effort was undertaken at the Mexican border, this time involving all four inspection agencies.

Various studies of the inspection system have suggested that some form of consolidation is necessary. For example:

- The present system of multiple inspections with its independent supervisory channels did not satisfy the long-term needs of any of the inspection agencies.¹
- The combination of inspection functions not only was feasible but would improve scheduling, planning, and coordination; eliminate duplication; and reduce space requirements, inspection time, and staffing requirements.²

¹Citizens Task Force Study and Report, 1962; and Evaluation of the Mission, Organization and Management of Customs, 1964.

²Joint Immigration and Public Health Study, 1967.

- The present entry procedures only projected an adverse image of this country's willingness to receive foreign guests.¹
- Further opportunities exist for greater economy and efficiency through consolidation of certain port-of-entry inspection activities.²
- The traveling public runs the gauntlet of four separate inspections lasting from 30 minutes to 4 hours.²

In late 1967 and early 1968 a task force, including key members of all four agencies and chaired by an Office of Management and Budget official, reexamined the inspection system. Even before its studies were completed, the task force decided that extensive pooling of manpower through one-stop inspections could be effective at international airports.

To avert a crisis in the summer of 1968, the task force recommended experimental use of one-stop inspections at the Kennedy airport and at the San Antonio airport. In so doing the task force predicted:

"The inspection agencies at John F. Kennedy Airport face a chaotic summer in the clearance of people and baggage. Facilities there were considerably overtaxed last summer with peak loads of over 16,000 passengers per day. The predicted overload this summer threatens a breakdown of our inspection processes."

In its final report in May 1968, the task force observed that "the total inspection program is lacking direction, vitality, and responsiveness because of the divided responsibility among the four agencies." For these and other reasons the task force considered the establishment of a single inspection agency inevitable.

¹Industry--Government Special Task Force on Travel, 1968.

²Office of Management and Budget correspondence and related memoranda regarding a proposed study of consolidation possibilities, 1967.

EFFORTS AT KENNEDY AIRPORT

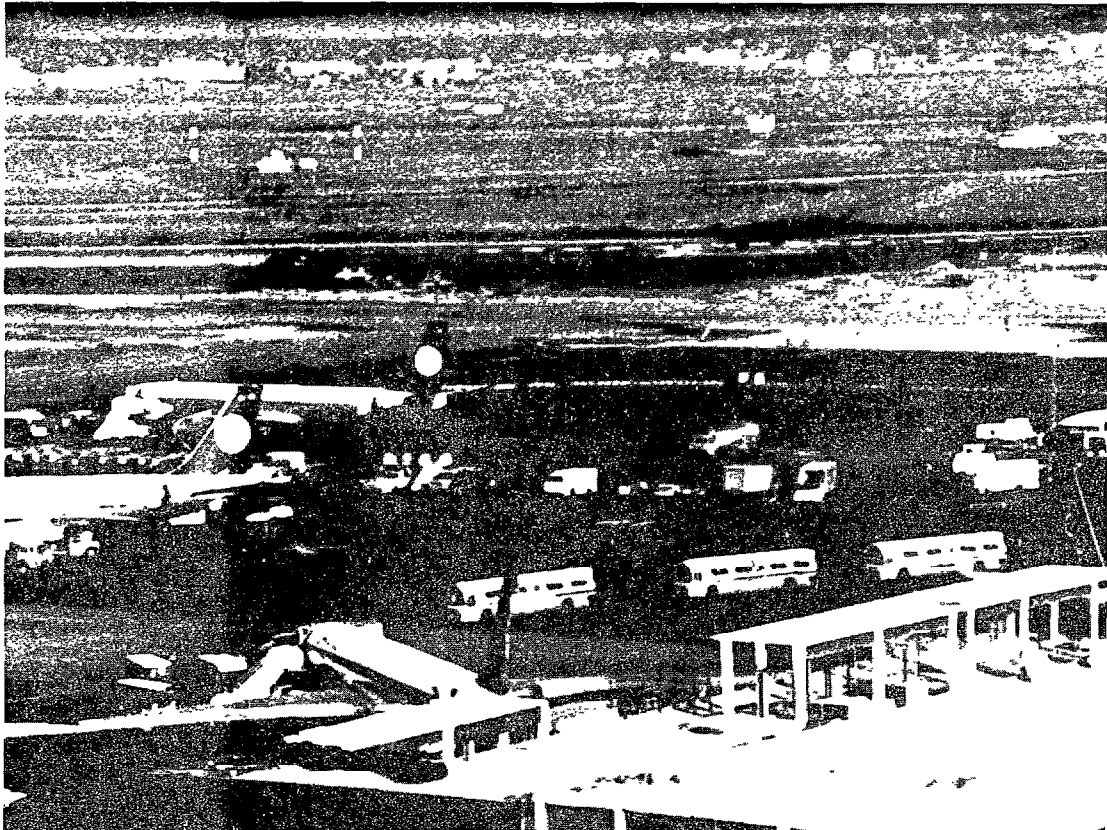
The experimental use of a one-stop inspection at Kennedy and San Antonio began in June 1968, just prior to the predicted summer crisis. The following are pictures of persons arriving and going through one-stop inspections at Kennedy.



Photograph provided by Port Authority of New York

Aircraft blocking area

BEST DOCUMENT AVAILABLE



Busing of arriving passengers

Photograph provided by Port
Authority of New York



Photograph provided by Port
Authority of New York

Preliminary screening and inspection



Photograph provided by Port
Authority of New York

Preliminary screening and inspection



Photograph by the General
Accounting Office

Baggage claim area

BEST DOCUMENT AVAILABLE



Photograph by The General
Accounting Office

Baggage inspection belts

Local officials of the four agencies at Kennedy conceded that one-stop inspections had prevented breakdowns of operations in the summers of 1968, 1969, and 1970. However, they were unhappy about the quality of the inspections. The officials complained that:

- Payment of duty could be readily avoided.
- Selective baggage inspection was not difficult to circumvent.
- Inspectors were idle in one area while backlogs of travelers waited nearby.
- Many air arrivals entered without Customs processing, and few persons suspected of smuggling were referred from preliminary inspections to Customs secondary inspections.

Immigration criticized the frequent rotation of inspectors and felt that the long intervals between assignments prevented proficient preliminary screening of arrivals. Public Health suggested that training for the multiple duties of preliminary screening had been brief and inadequate.

Customs was even more specific, asserting that only trained and experienced Customs personnel can inspect baggage competently and that people and baggage must be viewed simultaneously for Customs officers to make the best judgment.

In late 1970, to deal more intensively with the administration's anti-drug-smuggling campaign, Customs withdrew its personnel from the preliminary screening stations and so halted one-stop screening and clearance for air arrivals. Public Health and Immigration continued to collaborate on a single preliminary screening post. For all practical purposes, however, the inspection system at Kennedy airport reverted to practices which have long been considered inadequate.

CHAPTER 4

CONCLUSIONS, RECOMMENDATION, AND AGENCY COMMENTS

CONCLUSIONS

The four inspection agencies recognize that a fragmented approach to port-of-entry inspections will not allow the development of a more efficient and effective inspection system. The increasing number of persons entering the United States at international airports aggravates the problems caused by this fragmented approach. The benefits of single-agency management of inspections include:

- Development of a single inspection system.
- Uniform administrative policies and procedures.
- Improved scheduling, planning, and coordination.
- Elimination of duplication.
- Reductions in space and staff requirements and inspection time.

Efforts to improve the inspection system have been frustrated because of the inherent difficulties of multi-agency cooperation. The four agencies need to effectively cooperate to initiate action to implement single-agency management.

RECOMMENDATION

We recommend that the Director, Office of Management and Budget, in cooperation with the Attorney General and the Secretaries of Health, Education, and Welfare; Agriculture; and the Treasury implement single-agency management of port-of-entry inspections.

AGENCY COMMENTS AND ACTIONS

On March 28, 1973, the President transmitted to the Congress Reorganization Plan No. 2 which will transfer the

functions of the Immigration and Naturalization Service related to the inspection of persons and documents, and the related manpower, to the Bureau of Customs. In commenting on our draft report, the Office of Management and Budget stated that the Reorganization Plan was a major step toward achieving single-agency inspection and that, after this transfer is effected, the possibilities for further improvement in the inspection process will be reviewed.

The Department of Agriculture generally supported our recommendation but suggested that inspections at major international airports be under a single manager responsible to a board composed of officials of the four inspection agencies. The Departments of Justice and the Treasury agreed with our recommendation.

The Department of Health, Education, and Welfare agreed that increased cooperation between the inspection agencies could contribute to a more efficient and effective inspection service but did not agree that its inspection function should be placed under single-agency management. The Department contended that its inspection activities are unique and can best be done through selected surveillance by those who have an experienced understanding of disease epidemiology.

The proposal under Reorganization Plan No. 2 to transfer the Immigration and Naturalization Service's inspection functions to the Bureau of Customs would be a significant first step in eliminating the problems discussed in this report.

Single-agency management of inspections would not eliminate experienced judgment or expertise in a particular inspection function. In the case of Public Health inspections, epidemiological surveillance need not be eliminated, it could still be accomplished by trained inspectors. At the present time Public Health and Immigration work together on a single preliminary screening post. We believe that the Office of Management and Budget should continue its efforts to bring about unified management of port-of-entry inspections.

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

APR 12 1973

Mr. Victor L. Lowe
Director, General Government Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Lowe:

This is in response to your letter to Mr. Lordan requesting comments on your proposed report to the Congress on the need for single agency management of port-of-entry inspections. Our response was delayed because of the concurrent development of Reorganization Plan No. 2 which the President transmitted to the Congress on March 28, 1973.

The Reorganization Plan represents a major step toward achieving single-agency inspection, which is the objective you urge in your proposed report. The functions related to the inspection of people and documents, with the associated manpower, would be transferred from the Immigration and Naturalization Service to the Bureau of Customs. The details of the proposed transfer are now being worked out. After this transfer is effected, the possibilities for further improvement of the inspection process will be reviewed.

We have no objections to the conclusions and recommendations in your report, but suggest that you may wish to update the report to take account of the President's action in transmitting Reorganization Plan No. 2.

Sincerely,



Mark W. Alger
Chief, General Government
Programs Division



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

March 30, 1973

Address Reply to the
Division Indicated
and Refer to Initials and Number

Mr. Daniel F. Stanton
Assistant Director
General Government Division
United States General Accounting Office
Washington, D. C. 20548

Dear Mr. Stanton:

This letter is in response to your request for comments on the draft report titled "Need for Single Agency Management of Port-of-Entry Inspections."

We consider the recommendation of the report to be appropriate and well founded. Action to carry out the recommendation has been initiated as a result of the executive decision announced by President Nixon designating the Bureau of Customs as the single agency manager of port-of-entry inspections. Approximately 1,000 Immigration and Naturalization Service employees will be transferred to the Bureau of Customs to effectuate "one stop service" at all official United States ports of entry.

We appreciate the opportunity afforded to us to provide comments on the draft report.

Sincerely,

A handwritten signature in black ink, appearing to read "Glen E. Pommerening".

Glen E. Pommerening
Acting Assistant Attorney General
for Administration



DEPARTMENT OF THE TREASURY
BUREAU OF CUSTOMS
WASHINGTON



APR 4 1973

REFER TO

MAN-1-O:I B

Mr. Charles P. McAuley
Assistant Director
General Government Division
U. S. General Accounting Office
Washington, D.C 20548

Dear Mr. McAuley:

In response to your letter of February 20, 1973,
to the Secretary of the Treasury, we attach our comments
on a proposed report to the Congress by the Comptroller
General regarding single agency management of port-of-entry
inspections.

Sincerely yours,

Commissioner of Customs

Enclosure

REPLY TO: COMMISSIONER OF CUSTOMS, WASHINGTON, D.C. 20226

APPENDIX III

Treasury Department, Bureau of Customs

Comments on draft of Comptroller General's Report to the Congress on the need for Single Agency Management of Port-of-Entry Inspections.

The draft report generally identifies the Customs problems which are caused by the fact that 4 agencies share responsibility for and management of port-of-entry inspections. It appears to be obvious from several studies which have been made that single agency management of the inspection process would result in more effective inspections, more efficient management of manpower resources, and better service to the public.

The Bureau of Customs and the Treasury Department concur in the recommendation to implement Single Agency Management of primary port-of-entry inspections; however, the draft report does not indicate which agency should be made responsible for inspections under the single agency management concept. The President, on March 28, 1973, announced Reorganization Plan No. 2 of 1972 which proposes the designation of the Bureau of Customs as the Single Agency Manager of ports-of-entry inspections. Some of the reasons which support this designation are set forth below:

1. Customs presently provides the major manpower resources for port-of-entry inspections. For example, during November 1-30, 1972, Customs provided 61 percent of the total manhours required for land border inspections; 59 percent of the total manhours required for inspection of commercial air and sea passengers; and 75 percent of the total manhours for inspections of private vessels and aircraft.
2. The Customs Automated Data Processing Intelligence Network (CADPIN) is superior to the Immigration Soundex System in quickly identifying suspects at the primary inspection point. For example:
 - a. Soundex is a coded system. The querying officer must encode the name before the system is usable. CADPIN input is not coded;

- b. Soundex provides very limited information on a suspect -- basically, it tells if he is wanted and the general category of crime. CADPIN provides complete descriptions and many more identifiers such as aliases, associates, modus operandi, pertinent prior record, and cautions about whether a suspect may be armed and dangerous;
 - c. Soundex is more time-consuming. It is dependent upon the facility of the querying officer to encode names and locate the names in a loose-leaf book. Additions and deletions must be in printed page form and inserted or deleted when changes are necessary. CADPIN gives a response in 1 or 2 seconds at primary inspection point and in 3-8 seconds at secondary inspection point. Information can be quickly added to or deleted from the CADPIN data bank;
 - d. Soundex has little or no tie-in with other agency intelligence. CADPIN is linked with NCIC (which has 5 million records), and is interfaced with IRS, Secret Service, and ATF intelligence sources; and
 - e. CADPIN possesses administrative message capability for which there is no counterpart in Soundex.
3. The Bureau of Customs has independently conducted a study of the more recent problems involved in multi-agency management of port-of-entry inspection. As a result of this study, the Treasury Department has forwarded to the Office of Management and Budget a recommendation that the single agency management system be adopted, beginning with primary inspections at land border crossings; primary inspections of ferries arriving from contiguous countries; and inspections of all private yachts and private aircraft. A copy of the Treasury presentation to OMB is attached.

In addition, the Bureau of Customs believes that the single agency concept should also apply to inland ports and land border inspections, and stands ready to assume these responsibilities.

[See GAO note.]

GAO note: These comments were considered in the preparation of our final report but are not reproduced herein.



DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20201

APR 17 1973

Mr. John Heller
Associate Director
Manpower and Welfare Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Heller:

The Secretary has asked that I respond to your letter of February 20, in which you asked for our comments (enclosed) on a draft of your report to the Congress entitled, "Need for Single Agency Management of Port-of-Entry Inspections." We appreciate the opportunity to comment on this report in draft form.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "J. B. Cardwell".

James B. Cardwell
Assistant Secretary, Comptroller

Enclosure

COMMENTS OF THE DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE
ON A DRAFT GAO AUDIT REPORT ENTITLED, "NEED FOR SINGLE AGENCY
MANAGEMENT OF PORT-OF-ENTRY INSPECTIONS"

Recommendation: The Director, Office of Management and Budget, in cooperation with the Attorney General and the Secretaries of Health, Education, and Welfare, Agriculture, and the Treasury initiate necessary actions to implement single agency management of port-of-entry inspections.

HEW Comment:

We are in agreement that increased cooperation between the agencies involved could contribute to a more efficient and effective inspection service. The Department's Center for Disease Control (CDC) will be glad to actively cooperate in those areas which would lead to this goal. The areas involved are as follows:

Development and implementation of an information system for travelers, industry, and others.

Developing and implementing uniform administrative policies and procedures.

Plan, develop, and implement improved scheduling (including standardization of work shifts), planning and coordination.

Eliminating duplicative work or otherwise unnecessary work.

Reducing space and manpower requirements.

Developing uniform rules/regulations/laws for overtime rates of pay and establishing uniform criteria for determining when carrier or government pays.

The development and implementation of a management-information system.

Development of training program, including CDC training expertise and resources as requested.

However, we do not agree with the GAO recommendation that surveillance activities exercised by HEW representatives be placed within a single agency for management of port-of-entry inspections. This Department's port-of-entry surveillance activities are rather unique and cannot be categorized as

APPENDIX IV

"routine inspections." Advances in disease control have made routine inspections obsolete. The activities carried out by CDC representatives relate to epidemiological surveillance; best done through (i) selective surveillance and experienced professional judgment, (ii) by those who have an experienced understanding of disease epidemiology.

In addition, personnel for port-of-entry surveillance are not necessarily assigned based on volume of travelers but on potential risk. This risk can vary depending on the number of foreign travelers entering from areas having epidemics, number of countries having epidemics, and the time of the year. CDC's approach, due to the very nature of these surveillance strategies, requires a less quantitative and more targeted approach in fulfilling these responsibilities.

Aside from the technical competence of the staff, those working in disease surveillance require a familiarity with the network of public and private health resources that are essential in mobilizing a community's defense against a potential disease threat. Disease intervention demands efficient relationships which can be harnessed quickly in the face of a possible epidemic. These public health responsibilities and functions require a degree of public health competence that cannot be expected outside of a public health agency. Furthermore, communicable disease surveillance and control in the community requires a high degree of interaction between those responsible for carrying out these responsibilities and other Federal, State, and local health agencies.

Clearly, it is on a qualitative basis that we take exception to the GAO recommendation. It is our judgment that the criteria for describing efficient operations related to port-of-entry inspection for CDC differs with criteria followed by the three other agencies involved.

UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
WASHINGTON, D. C. 20250

MAR 26 1973

Mr. Richard J. Woods
Assistant Director
Resources and Economic Development Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Woods:

This is in response to your February 20 letter regarding a proposed report to Congress on the need for single agency management of port-of-entry inspections. The report addresses itself to passenger and baggage inspection at major international airports, and our comments on the recommendation concern that aspect of port-of-entry inspections.

USDA generally supports the General Accounting Office recommendation. We further believe that the issue involved is not so much one of concept as it is of definition and implementation of "single agency management" in such a way that each agency feels its responsibilities are being more efficiently met than at present.

Because of this, we suggest the consideration of an executive board at each major international airport composed of the official in charge of each of the four inspection agencies (Public Health, Customs, Immigration, Agriculture) at the airport. All aspects of passenger and baggage inspection at the airport would be under the direction of a single manager, preferably an individual who is not an employee of any of the four inspection agencies. The manager should be given direction by and be responsible to the executive board.

It is realized that many factors and details must be considered in implementing such a system. We, therefore, believe that representatives of the organizations within each agency directly involved with passenger and baggage inspection will need to work together, perhaps with the Office of Management and Budget in a coordinating role, if the recommendation is developed.

Sincerely,



F. J. Mulhern
Administrator

APPENDIX VI

PRINCIPAL GOVERNMENT OFFICIALS
 RESPONSIBLE FOR ADMINISTRATION OF ACTIVITIES
 DISCUSSED IN THIS REPORT

Tenure of office	
<u>From</u>	<u>To</u>

DEPARTMENT OF JUSTICE

ATTORNEY GENERAL:

Elliot L. Richardson (acting)	Apr. 1973	Present
Richard G. Kleindienst	June 1972	Apr. 1973
Richard G. Kleindienst (acting)	Feb. 1972	June 1972
John N. Mitchell	Jan. 1969	Feb. 1972
Ramsey Clark	Oct. 1966	Jan. 1969

DEPARTMENT OF THE TREASURY

SECRETARY OF TREASURY:

George P. Shultz	June 1972	Present
John P. Connally	Feb. 1971	June 1972
David M. Kennedy	Jan. 1969	Feb. 1971

DEPARTMENT OF AGRICULTURE

SECRETARY OF AGRICULTURE:

Earl L. Butz	Dec. 1971	Present
Clifford M. Hardin	Jan. 1969	Nov. 1971
Orville L. Freeman	Jan. 1961	Jan. 1969

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

SECRETARY OF HEALTH, EDUCATION,
 AND WELFARE:

Caspar W. Weinberger	Feb. 1973	Present
Frank C. Carlucci (acting)	Jan. 1973	Feb. 1973
Elliot L. Richardson	June 1970	Jan. 1973
Robert H. Finch	Jan. 1969	June 1970

<u>Tenure of office</u>	
<u>From</u>	<u>To</u>

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

SECRETARY OF HEALTH, EDUCATION,
AND WELFARE: (Continued)

Wilbur J. Cohen	Mar. 1968	Jan. 1969
John W. Gardner	Aug. 1965	Mar. 1968



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