

**U.S. Department of Homeland Security
Border and Transportation Security
Customs and Border Protection**



**U.S. Department of Agriculture
Marketing and Regulatory Programs
Animal and Plant Health Inspection Service**



***Report of the APHIS-CBP Joint Task Force
on Improved Agriculture Inspection***

June 2007

Introduction

The events of September 11 forever changed this Nation, including the scope of work of many Federal agencies. In addition to historic concerns about inadvertent introduction of harmful plant pests and foreign animal diseases, the threat of intentional introductions of pests or pathogens as a means of agroterrorism became a very real possibility. Guarding against such a possibility is important to the biosecurity of the Nation and failure to do so could disrupt American agricultural production, erode confidence in the U.S. food supply, and destabilize the U.S. economy. The Department of Homeland Security (DHS) was established to address the full range of threats, including agricultural threats, approaching U.S. borders. DHS, Customs and Border Protection (CBP) conducts inspections of passenger baggage, conveyances, and cargo entering the United States to prevent the entry of plant and animal pests and diseases into the United States. The U.S. Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS) shares the mission of safeguarding America's agricultural and natural resources by establishing policies and regulations related to enterability of products, providing for identification of pests, training CBP employees, conducting risk assessments, and providing methods development support. The fulfillment of this shared mission ensures an abundant, high-quality, safe, and varied food supply, strengthens the marketability of U.S. agriculture in domestic and international commerce, and contributes to the preservation of the global environment.

APHIS and CBP are committed to working cooperatively to ensure the safety of the United States, its food production and ecosystems. The infusion of the agricultural mission into DHS in 2003 spread the mission over a broader workforce, creating the potential for an exponential strengthening of the safety of U.S. agricultural and natural resources. At the same time, the transfer of APHIS employees to CBP contributed to the overall security of the United States by increasing the U.S. capacity for inspections focused on security needs.

Whether plant pest and foreign animal disease introductions are intentional or unintentional, the negative consequences can be severe. Negative impacts include a possible introduction of invasive plant pests or foreign animal disease becoming established in the United States, costing American taxpayers tens of millions of dollars in detection, control, and eradication programs, and increased costs for food and fiber. International trade could also be greatly affected, as many trading partners would no longer import U.S. agricultural products due to the presence of these pests. In addition, keeping food abundant and affordable is a major contributing factor in the availability of disposable income that generates economic health in the United States. It is imperative that the agricultural mission remain a strong component of the DHS mission. This message has been emphasized repeatedly by Congress and by those reliant on the successful fulfillment of the agriculture mission.

A number of reviews have been conducted internally and externally over the past 4 years to evaluate the impact of the Government restructuring on the agriculture mission. These reviews have identified the strengths of the agricultural safeguarding program and the

areas for improvement. To ensure the health of the mission and the organizations supporting the mission, a periodic review of progress and future needs is appropriate. APHIS and CBP established a joint task force and undertook such a review in April 2007. The task force was comprised of employees from both organizations from various levels in each organization. The task force looked at data in various reports, including internal quality assurance reviews and reports of the respective Offices of the Inspector General and the Government Accountability Office. The group also evaluated stakeholder concerns as expressed in correspondence and at a stakeholder listening session conducted in May 2007. Finally, the group evaluated other sources of information, such as documents indicating support for various pieces of legislation introduced to return the agriculture function to APHIS from CBP.

The report contains the core recommendations of the task force for both agencies to strengthen the delivery of the agriculture mission

Key Issues

The task force identified ten fundamental categories of key issues. These issues were comprehensively examined and discussed by the task force to understand the underlying barriers to achieving optimum program performance. The appendices to this report are a series of detailed implementation action plans that address the key issues by category and outline steps necessary to implement corrective actions and improvements.

The overarching theme focused on raising the priority of the agriculture mission within CBP and developing strategies to improve capability to prevent the introduction and establishment of exotic plant pests and foreign animal diseases, and its integration into the primary CBP mission of preventing terrorists and terrorist weapons from entering the United States. During the stakeholder listening session on May 8, 2007, it was acknowledged that terrorism was a dangerous threat that needed the utmost attention from U.S. border security personnel. However it was recognized that in relation to the concentrated focus on this threat, the agriculture mission loses a degree of significance as priorities are established in CBP. As a result, the ability of the organization to fully implement agriculture priorities is hindered.

The following are key issues the task force identified for which action plans have been developed.

Structure/Leadership: Management and leadership infrastructure supporting the agriculture mission in CBP should be staffed and empowered at levels equivalent to other functional mission areas in CBP.

Joint Agency Planning: There is a need for an effective joint planning effort on numerous fronts to ensure that both Agencies are jointly placing priority on the agriculture mission and approaching mission delivery appropriately and consistently.

Resources: Improve the agriculture mission through more transparent financial accountability for Agriculture Quarantine and Inspection (AQI) resources and more effective and efficient programmatic and human capital resource management.

Emergency Response: APHIS and CBP need a joint comprehensive plan to effectively deploy CBP or APHIS resources during an agriculture related emergency and more coordinated response plans for emergencies affecting continuity of operations.

Training: CBP and APHIS need to continue to review and improve the agriculture-related training programs used by CBP.

Outreach and Communication: There is a need for access to CBP officials by stakeholders to be able to voice their concerns and a need to establish forums to discuss issues. There is also an identified need for better communications and information sharing between CBP and APHIS.

Performance Measures: There is a need to develop and implement both joint and CBP program performance measures for AQI activities that appropriately and adequately correlate to user fee functions as well as the disbursement of appropriated dollars. Performance measures will accurately reflect the accomplishment of the agriculture mission within CBP.

Information Management: CBP and APHIS need to develop a coordinated and comprehensive process to identify essential and common data elements. CBP and APHIS need to evaluate all information systems useful in compiling and expressing outcomes. CBP and APHIS need to ensure data quality and integrity and that analysis of program information is coordinated. Consistency is needed in both data input and output.

Regulatory Enforcement: There is a need for a fully coordinated effort to maintain an effective and efficient process to enforce agricultural quarantine and inspection laws and regulations.

Pest Identification: CBP and APHIS need a joint comprehensive plan to establish standards of service in pest identification, training, and discard authority.

Core Recommendations

The task force examined these findings and developed a set of core recommendations to address the underlying issues. The more detailed recommendations are contained in the implementation action plans (see Appendices).

- Establish an agriculture structure within CBP with agriculture positions at various levels in the ports, field offices, and headquarters to enhance leadership, improve stakeholder communications, provide management continuity, analyze and communicate agriculture risk, and provide a career ladder for Agriculture Specialists.

- Institutionalize a central planning process for activities that implement or support the shared mission including strategic planning, joint performance measures, information technology planning, training, operational goals, and joint plans at the field levels.
- Develop new tools or enhance existing ones to evaluate agriculture risk and staffing criteria to maximize the utilization of resources.
- Develop a transparent financial tracking system for AQI user fee and appropriated funds for both APHIS and CBP.
- Ensure adequate equipment, supplies, and facilities at ports of entry to carry out the agriculture mission.
- Evaluate the APHIS and CBP agriculture interface to better integrate APHIS expertise, abilities, and resources into CBP operations.
- CBP and APHIS need to validate the agriculture canine training program.
- Measure and review emergency response plan implementation for effectiveness and incorporate needed changes for improved response and deployment for both agencies.
- Evaluate on, a regular and recurring basis, the current quality assurance guidelines through the established Joint Agency Quality Assurance Program and make adjustments as needed.
- CBP and APHIS will continue to identify and create training opportunities for CBP.
- CBP and APHIS management officials at all levels will seek out opportunities to meet regularly and interact with stakeholders to have dialogue concerning agriculture inspection activities in their areas of responsibilities.
- APHIS and CBP will work together to develop and implement a set of performance measures for AQI activities performed for various pathways at ports of entry.
- Jointly develop short- and long-range plans to improve information system performance, data management, and the analytical process.
- Appoint joint task groups to evaluate various operational functions for regulatory enforcement, and pest identification.

Measures for Success

Success will be accomplished when the agriculture function within CBP is positioned prominently throughout the organization. The potential introduction of plant and animal pest and diseases will be regarded with the same fervor as all other mission areas within CBP.

Success will result in mitigation of threats through improved pest and disease exclusion activities; the development and utilization of criteria for identifying high-risk pathways to align resources. Success comes when inspections are conducted and considered the primary mechanism to enforce compliance; quality pest interceptions are highly regarded and employees are rewarded. Pest identifications are timely and accurate, and the results are communicated.

The agriculture function in CBP will have the leadership, structure and authorities at all levels necessary to carry out an effective plant pest and foreign animal disease exclusion program. The leadership of the organization will have established communication linkages and maintain an open and continuous dialogue with stakeholders and USDA policymakers. Agriculture stakeholders will be well informed of the CBP agriculture function and its successes, and have confidence in the direction and future of the program.

A successful organizational structure will place agriculture-related positions at all levels and provide necessary authorities to elevate and accentuate the agriculture mission. The structure will present an opportunity for Agriculture Specialist to advance their careers, which provides CBP a means to maintain and build upon the institutional knowledge that is vital to the advancement of the agriculture mission.

Agriculture Specialists staffing will be risk-based and managers will be accountable for the delivery of joint agriculture training programs. The joint planning process will be focused on the alignment of an agriculture mission that is fully shared and has clearly-defined and mutually agreed-upon goals and objectives.

Joint emergency response plans will be in place to address domestic agriculture and agro-bio terrorism emergencies as well as maintain continuity of operations. Output, outcome and efficiency performance measures will be in place for inspection activities for all pathways. Information systems will be supported and fully integrated (connectivity and compatibility); standardized data management procedures established; and analysis functions shared. Key operational processes will have established quality control mechanisms.

Morale and productivity of the Agriculture Specialist will improve due to increased resources, utilization of their expertise and attainment of a higher sense of purpose.

Challenges

The recommendations represent a significant shift in how the agriculture function in CBP is carried out. This also represents a shift for USDA in the elevated level of participation and coordination that will be needed to sustain program effectiveness. In this regard there are numerous challenges to overcome for this plan to be successful.

First and foremost, the focus is not about competing priorities. Rather, the focus is about the shared mission. Agriculture stakeholders in the United States need to be reassured that CBP values the agriculture mission as much as its primary function of anti-terrorism. In collaboration with APHIS, CBP is fully capable of protecting the environment, the food supply, and increasing the exports of farm products by excluding harmful plant pests and foreign animal diseases.

The implementation action plans will need to be embraced by both organizations and communicated at all levels with firm commitments to carry out all agreed-upon recommendations. The time commitment by employees from both agencies will be considerable. Employees with specific skills, expertise and authority will need to be fully engaged in the process.

In addition to the organizational commitment, stakeholder buy-in will also be a critical factor for success. Stakeholders will need to be assured that their issues are being addressed and the necessary changes for long-term success are being implemented. Communication linkages will need to be established and maintained throughout the process.

Adequate resources will be essential. This could require internal restructuring of positions and strategic use of user fee revenues to elevate the agriculture mission and implement necessary changes. The proposal calls for information technology requirements in the form of data system alignment and upgrades. Work units will need to fund travel to meet obligations of various work groups. In addition, contracting may become necessary to complete some requirements of the recommendations.

Maintaining Progress

Upon approval, each implementation action plan will have established timelines and milestones. The APHIS-CBP Joint Task Force will be the body that oversees the progress of this proposal. Each working group and/or project will have one to two members of the task force assigned either as a full participant or representative to ensure progress is sustained and the projects meet all established timelines, milestones, and objectives. The task force will meet or conference regularly and develop a semi-annual progress report for distribution internally and to stakeholders. The task force chairpersons will serve as the primary spokespersons for the project.

The task force fully supports the creation of an AQI advisory board that will be responsible for monitoring oversight and implementation of the action plans. The task force believes that State government needs to be a part of the advisory process. It would be the expectation that the State government would give due consideration to the constituents that they represent.

Conclusion

It has been four years since the port of entry agriculture inspection function was transferred from USDA to CBP. Over this timeframe CBP has worked to integrate the agriculture inspection function into one organization. The agriculture inspection function has improved in many areas as a result of the transition. However it has been identified through internal and external reviews as well as through stakeholders input that there is still much to be done.

USDA, DHS, and our agriculture stakeholders all share a common goal – safeguarding American agriculture. This report exemplifies the best ideas of all three groups. This report responds to a host of issues and concerns and provides a series of implementation action plans to address those issues. This report is a mandate for change. Better alignment and integration of the USDA and CBP functions and improvement of overall program delivery will be the true measurement of success.