

Implementation Action Plan

Quality Assurance

Issue:

Incorporation of quantifiable performance measures into the Customs and Border Protection (CBP) agriculture mission resulting in improved oversight and consistent application of the agriculture inspection policy.

Recommended Response:

- Develop quantifiable measurements that improve the integrity of data.
- Create performance matrices to measure training effectiveness.
- Improve the quality assurance in the CBP agriculture program.
- Identify and quantify the measurements of successful inspections.
- Enhance the effectiveness of targeting decision-making.
- Improve data management oversight.

Correlation to Report Recommendation or Other Feedback:

The Office of Inspector General (OIG) and Government Accounting Office (GAO) reports raised concerns of the lack of focus on the agriculture mission and the inability of CBP and U.S. Department of Agriculture (USDA) to work together and jointly move forward. Concerns were also raised in the sharing of information, establishment of performance measures, implementation of quality assurance matrices, and effective targeting decisions.

In a recent Agriculture Stakeholders Conference one of the two prevailing concerns was quality assurance of the CBP agriculture program. Specifically, what are the measurements that quantify a successful inspection in all CBP environments? According to the Stakeholders, the current data management system can not be relied upon. Data integrity was another concern. Stakeholders stated that a measurable data validation process needed to be created.

In addition, the GAO and OIG reports recommended developing a process to share alert information, creation of a risk-based staffing model to review staffing levels, improve data management oversight (i.e. AQIM/WADS), review the efficiency and effectiveness of agriculture operations, and review agriculture operations relating to the MOA.

Findings:

Joint Agency Quality Assurance Program (JAQAP) reviews have been completed at 30 ports of entry since 2005. These reviews have addressed agriculture processes including cargo and secondary passenger/vehicle inspection/targeting, data collection and reporting, K-9 utilization, CBP-USDA interaction/communication, garbage control regulations, and seized bird handling. Feedback from the field offices and ports, during

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the review, generally shows that they welcome these reviews as an opportunity to improve agriculture operations. The reviews have shown where CBP has improved in particular areas of operation while also demonstrating areas that are in need of improvement. The reviews generally show the port's need to "tweak" operational processes rather than having to make wholesale changes. For example, the reviews have revealed lack of updated SOPs for AQIM, WADS as well as not being familiar with cut flower program, baggage targeting and other agriculture related operational procedures. Generally the teams have observed improved use of compliance agreements and proper utilization of the compliance templates available in the Manual of Agriculture Clearance. Data inaccuracies have often been the result of misunderstanding or misinterpretation of definitions. USDA has offered to conduct data management refresher trainings which have been accepted by many ports.

The reporting process has evolved to address field office and ports needs for an easily read, but detailed report on the specific issues. The original narrative report has been replaced by a bulleted format that states the issues clearly and factually without excessive narrative. All reports are vetted through the quality assurance team members, including the recommendations and matrices. All statements in the report have been observed by at least one member of the review team and any questions concerning what was observed is verified with a CBP supervisor. The final report is then given to USDA and CBP management for review prior to distribution.

To date CBP has provided APHIS 28 completed matrices with the last two being finalized. A pilot follow-up review took place leading to incorporation of a progress report conference conducted 6 months after the submission of the tasking matrix to CBP.

Expected Outcome:

- The establishment, implementation, and utilization of quantifiable matrices as a validation tool of the effectiveness of the CBP agriculture program.
- Incorporation of performance measures into various reports such as the CBP Annual Report Card and the Field Office Report Card.
- Identified ramifications for responsible parties for not adhering or meeting the established performance elements and/or standards as identified in the joint agency action plans.
- Establishment of an enhanced Joint Agency Quality Assurance Plan with identifiable measures, outcomes, expectations, jointly agreed upon objectives, enhanced transparency, and a greater understood relevance to the quality assurance process.
- Follow-up reviews would be conducted by a Joint Agency Quality Assurance Plan team to assess the initiatives and/or implementation of the taskings and/or recommendations submitted by the review team to the port.
- Success would be seen and measured by improvements in areas reported to be under achieving.

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Tasks

- Convene a joint committee to develop performance matrices for the Joint Agency Action Plans (e.g. outreach, joint planning, emergency response, information management, resources, and training).
- Develop more definitive and measurable CBP Annual and Field Office Report Cards that identify critical agricultural components including CBP/PPQ joint performance measures and key components from the Joint Agency Action Plans.
- Develop and incorporate measures and/or metrics for the completion of CBP agriculture related training modules.
- Develop quality assurance matrices for the Joint Quality Assurance Plan.
- Modify the Joint Agency Quality Assurance Plan to include clear joint guidance on providing feedback, definition of recommendation matrices, and identification of follow up review criteria.
- Enhance consistent feedback mechanisms for the CBP/USDA joint port quality assurance reviews.
- Develop and implement reporting mechanisms for documenting outreach-related activities.
- Develop and implement quantifiable measurements into CBP agriculture data collection related to quality assurance to include data integrity.
- USDA and CBP should meet to review and confirm the current Joint Agency Quality Assurance Plan, process, objectives, and performance measures.

Communication Needs

- Review and approval by Agency/Department leadership with concurrence on establishment of identified group to develop performance measures.
- Create a clear charge for the Joint Quality Assurance Team.
- Communication with management and employees related to performance measurement expectations and accountability.
- Communication with Agriculture Stakeholders related to the Quality Assurance Implementation Action Plan.
- Suggested changes to the Joint Quality Assurance Team recommendations would need to proceed through vetting mechanisms prior to executive management review.
- Field offices and ports are contacted and provided information/agenda issues before any Joint Quality Assurance review is conducted.
- Review and approval by the Assistant Commissioner CBP and Deputy Administrator Plant Protection and Quarantine (PPQ) of the Joint Quality Assurance final reports.

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Accountable Individual/Group

- Approval of each agency management.
- Integration of each agency program management staff for the development of expanded quality assurance criteria as determined by executive management.

Resources

Appropriate staff from each agency familiar with the current Quality Assurance issues and processes

Sequencing/Linkage

None

Challenges to Implementation

Available knowledgeable staff

Review Block -- for the use of Agency/Department leadership in adopting, modifying, or rejecting the plan

Quality Assurance Implementation Action Plan adopted by both agencies
on _____, 2008, by:



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