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OFFICE OF INSPECTOR GENERAL

CBP Needs to Improve the Oversight of its Canine Program to Better Train and Reinforce Canine Performance (REDACTED)

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February 8, 2021
OIG-21-19



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Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

February 8, 2021

MEMORANDUM FOR: Troy Miller
Senior Official Performing the Duties of the
Commissioner
U.S. Customs and Border Protection

FROM: Joseph V. Cuffari, Ph.D.
Inspector General

SUBJECT: *CBP Needs to Improve the Oversight of Its Canine Program to Better Train and Reinforce Canine Performance – ~~Law Enforcement Sensitive~~*

JOSEPH V
CUFFARI

Digitally signed by
JOSEPH V CUFFARI
Date: 2021.02.04
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Attached for your action is our final report, *CBP Needs to Improve the Oversight of Its Canine Program to Better Train and Reinforce Canine Performance – ~~Law Enforcement Sensitive~~*. We incorporated the formal comments provided by your office.

The report contains four recommendations. Your office concurred with all four recommendations. Based on information provided in your response to the draft report, we consider recommendations 1, 2, and 3 resolved and open. Once your office has fully implemented the recommendations, please submit a formal closeout letter to us within 30 days accompanied by evidence of completion of agreed-upon corrective actions so that we may close the recommendations.

Based on information provided in your response to the draft report, we consider recommendation 4 unresolved and open. As prescribed by the Department of Homeland Security Directive 077-01, *Follow-Up and Resolutions for the Office of Inspector General Report Recommendations*, within 90 days of the date of this memorandum, please provide our office with a written response that includes your 1) agreement or disagreement, 2) corrective action plan, and 3) target completion date. Also, please include your responsible parties and other supporting documentation to inform us about the current state of the recommendation. Until your response is received and evaluated, the recommendation will be considered unresolved and open. Please send your response or closure request to OIGAuditsFollowup@oig.dhs.gov.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post a redacted version of the report on our website.

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Please call me with any questions, or your staff may contact Thomas Kait, Acting Assistant Inspector General for Audits, at (202) 981-6000.

Attachment



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DHS OIG HIGHLIGHTS

CBP Needs to Improve the Oversight of Its Canine Program to Better Train and Reinforce Canine Performance

February 8, 2021

Why We Did This Audit

The U.S. Customs and Border Protection's (CBP) Canine Program is the largest canine program in DHS, with more than 1,500 canine teams deployed at and between the Nation's ports of entry. We conducted this audit to determine to what extent CBP's canine training approach and execution support the Canine Program mission.

What We Recommend

We made four recommendations that, if implemented, should help CBP improve oversight of its Canine Program, formalize and implement a realignment plan for the training academy, provide proper training capabilities, and update and standardize program guidance.

For Further Information:

Contact our Office of Public Affairs at (202) 981-6000, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

CBP's training approach and execution do not fully support the canine teams' mission of detecting smuggling of illegal narcotics, agriculture products, and humans at and between ports of entry. In fiscal year 2019, CBP decided to realign its Canine Academy, which contributed to a decrease of canine teams trained in the first two quarters of FY 2020. This occurred because CBP did not adequately plan for the realignment or measure performance to demonstrate how the realignment would affect canine performance.

The Office of Field Operations (OFO) canine teams used pseudo narcotic training aids past the recommended replacement cycle (outdated). Both Border Patrol and OFO canine teams used outdated actual narcotic training aids during proficiency training in the field. Additionally, OFO canine team files did not have required proficiency training documentation. The use of outdated training aids and the missing documentation occurred because CBP Canine Program management did not provide adequate oversight to ensure training aids were available to canine teams and certified instructors were properly documenting proficiency training.

CBP's inadequate governance of canine team operations led to outdated Canine Program policies and procedures, inconsistent retention periods for training documents, and an absence of Canine Tracking System policies and procedures. This inadequate governance ensued because CBP Canine Program management did not prioritize program management as other challenges took precedence. Without a comprehensive realignment plan, adequate proficiency training, and proper governance, the CBP Canine Program will not be able to achieve desired growth or operate as intended.

CBP Response

CBP concurred with the recommendations.

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Abbreviations

CBP	U.S. Customs and Border Protection
CCEP	Canine Center El Paso
CCFR	Canine Center Front Royal
GAO	U.S. Government Accountability Office
K9TS	Canine Tracking System
LSSD	Laboratories and Scientific Services Directorate
MDMA	3,4-methylenedioxymethamphetamine
NCP	National Canine Program
OFO	Office of Field Operations
OTD	Office of Training and Development
POE	port of entry



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Background

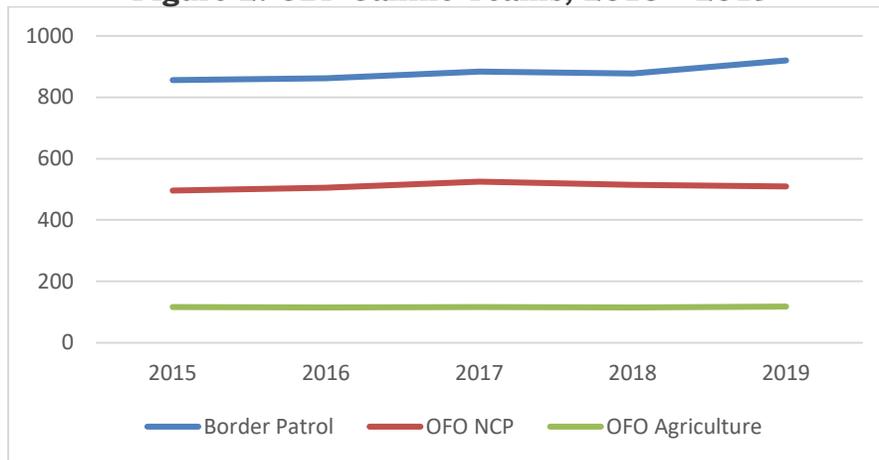
U.S. Customs and Border Protection’s (CBP) mission is to safeguard America’s borders from dangerous people and materials while enhancing the Nation’s global economic competitiveness through legitimate trade and travel. CBP’s Canine Program, which refers to its collectively managed canine team operations and training, is critical to achieving this mission. The primary goal of canine teams, each consisting of a certified detection canine and a certified handler, is to detect and apprehend persons attempting entry into the United States whose intent is to organize, incite, and carry out acts of terrorism. The Canine Program’s secondary goal is detection (as shown in Figure 1) and seizure of controlled substances and other contraband, often used to finance terrorist and criminal drug trafficking organizations.



Figure 1. Office of Field Operations (OFO) canine team
 Source: Office of Inspector General (OIG) audit team

CBP’s Canine Program is the largest canine program in the Department of Homeland Security, with more than 1,500 canine teams deployed at and between the Nation’s ports of entry (POE). According to CBP data, the number of canine teams in CBP has remained relatively constant over the last 5 years, as shown in Figure 2.

Figure 2. CBP Canine Teams, 2015 – 2019



Source: OIG analysis of CBP data

The operational aspect of the CBP Canine Program comprises U.S. Border Patrol’s (Border Patrol) canine teams, OFO National Canine Program (NCP), and OFO Agriculture Canine Program. CBP certifies canine teams in multiple disciplines to detect concealed humans, narcotics, human remains, currency,



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firearms, and prohibited agricultural items. CBP’s Office of Training and Development (OTD) initially certifies canine teams for Border Patrol and OFO NCP.¹ The U.S. Department of Agriculture trains and initially certifies the OFO Agriculture canine teams at its National Detector Dog Training Center in Newnan, Georgia, which is a separate training program from that of CBP. Figure 3 shows a comparison of the different types of CBP canine teams.

Figure 3. Comparison of CBP Canine Teams by Operational Program

	Canine Teams	Disciplines	Academy	Field Training
Border Patrol	900 Canine teams	<ul style="list-style-type: none"> • Concealed humans and narcotics • Tracking and trailing • Patrol and special response • Search and rescue • Human remains and cadaver 	Canine teams are initially certified at CBP Canine Academy.	Maintenance training is conducted using actual narcotics.
OFO NCP	503 Canine teams	<ul style="list-style-type: none"> • Concealed humans and narcotics • Pedestrian processing • Currency and firearms 	Canine teams are initially certified at CBP Canine Academy.	Proficiency training is conducted using both actual narcotics and pseudo narcotic training aids.
OFO Agriculture	113 Canine teams	<ul style="list-style-type: none"> • Agriculture passenger clearance • Agriculture border • Agriculture cargo 	Canine teams are initially certified at U.S. Department of Agriculture National Detector Dog Training Center.	Proficiency training is conducted using fruits and meats.

Source: OIG analysis of CBP records

2009 Merger of CBP Canine Academy and 2019 Realignment

In October 2009, OTD merged the Border Patrol and OFO NCP canine training programs to create the CBP Canine Academy. OTD combined best practices from Border Patrol and OFO NCP into one standardized curriculum containing identical training philosophies and methodologies geared toward individual subcomponent operational requirements. CBP instituted the new academy using two training delivery sites: Border Patrol's National Canine Facility in El Paso, Texas, now known as Canine Center El Paso (CCEP), and OFO's Canine Enforcement Training Center in Front Royal, Virginia, now known as Canine Center Front Royal (CCFR).

¹ Student canine handlers are tested with their assigned canine using *U.S. Customs and Border Protection Canine Detection Team Certification Standards*. For certification, teams must accurately search multiple environments and locations. Each team must successfully complete the certification process to deploy operationally to a CBP location.



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In August 2019, the Acting CBP Commissioner signed a memorandum approving separation and realignment of the CBP Canine Academy, with the intent of better meeting Border Patrol and OFO mission requirements. According to the Acting Commissioner, once the realignment documents become final, OTD would provide subcomponent-specific curricula to train canine teams at CCEP and CCFR. OTD will continue to deliver the training although the training curriculum is developed from subcomponent coordination and is individualized to meet mission needs. The agriculture canine teams will continue to train at the National Detector Dog Training Center operated by the U.S. Department of Agriculture. Figure 4 shows the evolution of the CBP Canine Academy into two separate academies.

Figure 4. Evolution of CBP Canine Program Training



Source: OIG, based on CBP source documents

Field Training

After canine teams complete initial training at the academies and are deployed to the field,² Border Patrol and OFO conduct and manage their respective Canine Programs' field training. Headquarters Border Patrol, OFO NCP, and Agriculture Canine Program managers work with sector supervisors and field advisors to ensure the field is staffed with certified canine instructors. Border Patrol refers to proficiency training as maintenance training; OFO defines proficiency training as non-task-related training, task-related training, and controlled exercises. Certified canine

Proficiency training is the single most influencing factor affecting day-to-day performance and reliability of the dog.

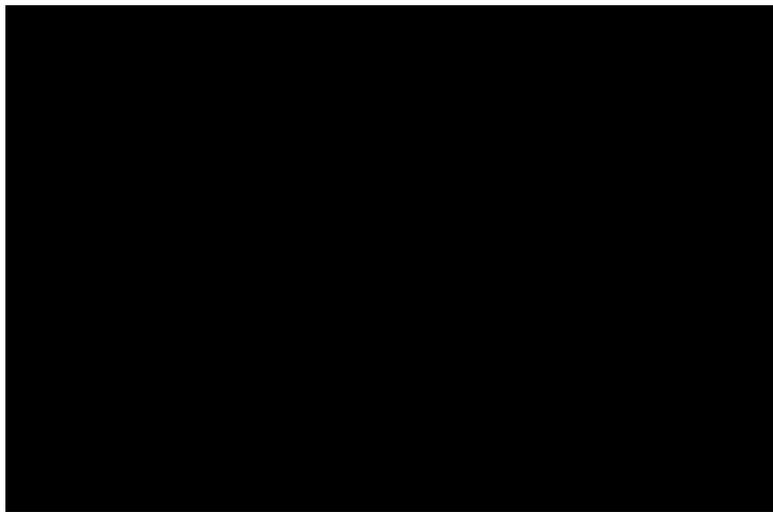
² Field is defined as the canine team's deployment location of operation (sector or field office). Sectors include Border Patrol stations and checkpoints along U.S. borders. Field offices comprise OFO POEs, which may be land borders, airports, or seaports.



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instructors conduct maintenance training and non-task-related training once a pay period,³ for 8 hours, using training aids. Enforcement training aids are made with actual narcotics [marijuana, cocaine, 3,4-methylenedioxymethamphetamine (MDMA), heroin, and methamphetamine (meth)⁴]; whereas, agriculture aids contain pork, beef, and prohibited fruits.

Certified canine instructors are responsible for constructing and concealing training aids, made with actual or pseudo narcotics, in different containers, as shown in Figure 5. The instructors also document and score the canine team's performance in detecting such training aids.



Additionally, OFO canine teams perform daily task-related proficiency training activities using pseudo narcotics and/or soft narcotics (marijuana and hashish). Pseudo narcotics are chemically formulated, non-narcotic materials designed to mimic the real odors of illegal substances such as heroin (Figure 6), cocaine, meth, and MDMA. CBP manufactured pseudo narcotics at CCFR until August 2020, when they transferred the equipment and responsibility to the Laboratories and Scientific Services Directorate (LSSD). Border Patrol does not require its canine teams to



Figure 6. Pseudo Narcotics Used by OFO NCP canines

Source: OIG photo taken during site visit

³ A pay period covers 2 work weeks as defined by 5 U.S. Code § 5504.

⁴ In response to the opioid epidemic, OFO added fentanyl to its list of actual narcotics for canine proficiency training. Only the OFO NCP canines train with fentanyl.



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conduct daily proficiency training, nor does Border Patrol use pseudo narcotic training aids.

Results of Audit

CBP's training approach and execution do not fully support the canine teams' mission of detecting smuggling of illegal narcotics, agriculture products, and humans at and between POEs. In FY 2019, CBP decided to realign its Canine Academy, which contributed to a decrease in canine teams trained during the first two quarters of FY 2020. This occurred because CBP did not adequately plan for the realignment or measure performance to demonstrate how the realignment would affect canine performance.

OFO's NCP canine teams used outdated⁵ pseudo narcotic training aids. Both Border Patrol and OFO NCP canine teams used outdated actual narcotic training aids during proficiency training in the field. Additionally, we found OFO NCP canine team files did not have required documentation for proficiency training. The use of outdated training aids and missing documentation occurred because CBP Canine Program management did not provide adequate oversight to ensure training aids were available to canine teams and that certified instructors were properly documenting proficiency training.

Furthermore, CBP's inadequate governance of canine team operations led to outdated Canine Program policies and procedures, inconsistent retention periods for training documents, and an absence of Canine Tracking System (K9TS) policies and procedures. This inadequate governance ensued because CBP Canine Program management did not prioritize program management as other challenges took precedence. Without a comprehensive realignment plan, adequate proficiency training, and proper governance, the CBP Canine Program will not be able to achieve desired growth or operate as intended.

CBP Did Not Adequately Justify Realignment of Its Canine Training

In FY 2019, CBP decided to separate what had been a unified Canine Academy training program into two subcomponent-specific training curricula realigned with Border Patrol and OFO NCP. In the first and second quarters of FY 2020, in transitioning to this realignment, the number of canine teams trained decreased. This reduction in the number of teams trained occurred in part because, prior to its decision, CBP did not adequately plan for the realignment

⁵ "Outdated" refers to training aids that are past their recommended replacement cycle.



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or measure performance to demonstrate how the realignment would affect canine performance.

Training Realignment Decision

According to CBP, realigning training with Border Patrol and OFO NCP would reduce the component's liability, as well as strengthen each subcomponent's capabilities through selection of task-specific personnel and canines and mission-specific canine training. CBP also asserted its growing footprint required support from more canine teams and an accompanying adjustment to the training curriculum. Finally, according to CBP Canine Program officials, Border Patrol and OFO NCP have unique training methods and operational environments, and subcomponent-specific curricula would better prepare canine teams for the dynamic operational needs of their respective environments.

In realigning training, CBP decided to re-establish two mission-driven academies — CCEP for Border Patrol and CCFR for OFO NCP. At each academy, the respective subcomponent would control its own policy and training curriculum, as well as use its own specific curriculum and instructors to train canines. OTD remains responsible for training execution to ensure it aligns with component established policies and procedures.

In August 2019, the CBP Acting Commissioner instructed Border Patrol, OFO, and OTD to form a joint working group to help transition to the realignment. As of May 2020, the joint working group was evaluating the instructional design of canine training, focusing on positive reinforcement and canine aggression requirements. In addition, the separated Concealed Human and Narcotics Detection Canine Handler Course (handler course)⁶ curriculum for Border Patrol and OFO NCP was still in draft. Therefore, as of May 2020, the two academies were still using the combined curriculum for the handler course.

Realignment Reduced the Number of Teams Trained

The Canine Academy realignment transition contributed to the reduced number of teams trained in the first two quarters of FY 2020 (October 2019 through March 2020). In this period, Border Patrol and OFO NCP both graduated fewer teams than planned in the new Concealed Human and

⁶ The Concealed Human and Narcotics Detection Canine Handler Course certifies a handler and canine at the completion of the 7-week course under the CBP Canine Detection Team Certification standards.

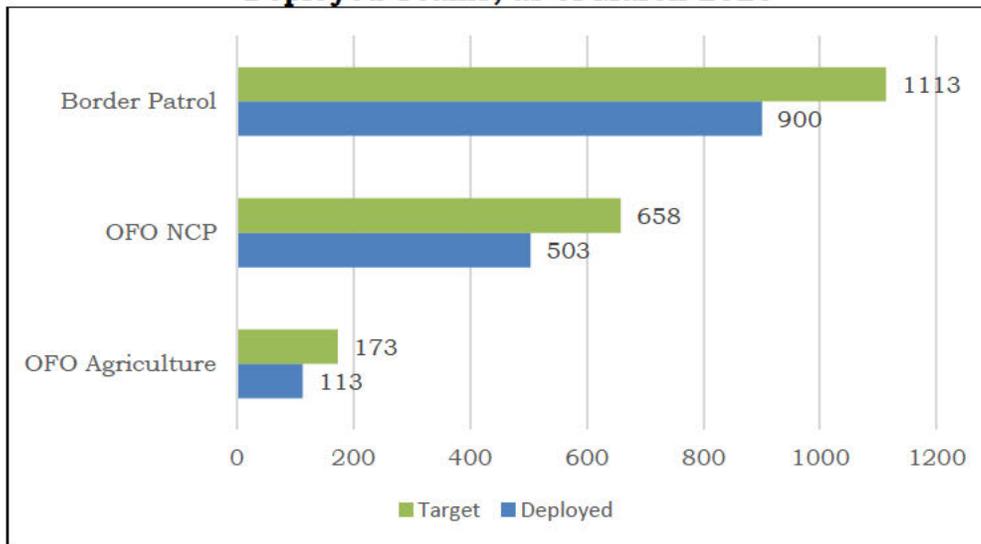


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Narcotics Detection Canine Handler Course. At OTD’s request, the subcomponents submit their planned number of seats each year to help OTD develop a National Training Plan. OTD designs the plan to substantiate the appropriate funding needed from CBP and to help the subcomponents achieve their target number of teams deployed. The subcomponents provide OTD with the number of seats needed for the year based on factors such as attrition and increasing their workforce to achieve their target of operation numbers. From the plan, OTD can determine the number of instructors and canines needed in a given quarter.

For the first two quarters of 2020, Border Patrol planned for 54 spaces, but graduated 49 teams, and OFO NCP planned for 27 spaces, but graduated 21 teams in the handler course. The reduction in trained teams contributed to CBP not achieving its total number of teams deployed within each operational program. As such, the subcomponents were not able to reach their target number of teams, as shown in Figure 7, because they were training fewer teams than planned.

Figure 7. CBP Planned Canine Team Deployment versus Deployed Teams, as of March 2020



Source: OIG, based on CBP Target of Operation and deployed canine team statistics as of March 2020

Insufficient Planning and Analysis to Justify the Realignment

According to U.S. Government Accountability Office (GAO) best practices,⁷ “an entity determines its mission, sets a strategic plan, establishes entity

⁷ *Standards for Internal Controls in the Federal Government*, GAO-14-704G, September 2014.



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objectives, and formulates plans to achieve its objectives.” In August 2019, Border Patrol and OFO briefed the CBP Acting Commissioner on the separate training curricula. According to a CBP official, OFO also drafted a governance document establishing oversight responsibilities for itself, Border Patrol, and OTD during the transition to separate, realigned curricula. However, CBP did not develop a strategic plan prior to the execution of the realignment, such as how it would provide enough instructors to staff each academy. Following approval of the realignment in August 2019, Border Patrol and OFO immediately decided they would no longer place new:

- Border Patrol instructors at OFO’s training center in Front Royal, or
- OFO instructors at Border Patrol’s training center in El Paso.

Instead, each subcomponent would only place its own instructors at its designated academy. OFO NCP did not provide enough instructors to facilitate full capacity training classes at the academies. Specifically, OFO did not provide enough instructors to meet OTD’s required 2:1, student-to-instructor, ratio.

CBP also could not provide performance metrics or other supporting documentation to clarify how the realignment would affect canine performance or enhance the subcomponent’s capabilities by implementing mission-specific canine training. OTD expressed concerns that it would be helpful if OFO provided metrics for canine training processes that were not working in order to establish guidance to correct the deficiencies. In addition, OFO Canine Program officials stated they did not have performance measures in place to support the need for the realignment.

CBP Could Not Ensure Canine Teams Received Adequate Proficiency Training

Canine teams for OFO NCP used outdated pseudo narcotic training aids, and teams from Border Patrol and OFO NCP used outdated actual narcotic training aids during proficiency training in the field. In addition, we found OFO NCP canine team files did not have required documentation for proficiency training. The use of outdated training aids and missing documentation occurred because CBP Canine Program management did not provide adequate oversight to ensure training aids were available to canine teams and that certified instructors were properly documenting proficiency training.



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OFO NCP Teams Were Training with Outdated Pseudo Narcotic Training Aids

As of March 2020, 460 of OFO NCP's canine teams were training in the field with pseudo training aids past the recommended replacement cycle for proficiency training.⁸ According to the *OFO Canine Enforcement Program Handbook*, pseudo narcotic training aids should be replaced every 4 months to ensure the aids do not become contaminated and lose their specific odor. Despite this requirement, during our site visits, we determined that in their task-related training, canine teams at six POEs used pseudo [REDACTED] and [REDACTED] that were past the 4 month recommended replacement cycle. Pseudo [REDACTED] and [REDACTED] are two of the four pseudo narcotic training aids OFO NCP uses. In August 2019, after we began our POE visits, OFO detailed two canine supervisors to mix, package, and ship pseudo [REDACTED] and [REDACTED] training aids to allow all POEs to have two current aids. Only two types of aids were prepared due to limited available materials and the detailed officers' time constraints. At the time of our October 2019 visits, the six POEs had current⁹ pseudo [REDACTED] and [REDACTED] training aids. However, as of January 2020, the pseudo [REDACTED] and [REDACTED] training aids had exceeded the recommended 4-month replacement period. The six POEs continued to use these pseudo training aids, even though they were outdated, per the *OFO Canine Enforcement Program Handbook* requirement. In addition, in January 2020, OFO confirmed that it has not detailed any additional officers to produce pseudo training aids to refresh the outdated ones.

In January 2020, we informed OFO leadership that during our POE site visits, we observed use of outdated pseudo narcotic training aids. Subsequently, OFO, together with OTD and the LSSD, developed a plan to meet the needs of the field that addresses the outdated aids. On April 1, 2020, OFO issued a memorandum, "Pseudo Narcotics for Canine Training Aids," which established new guidance on the manufacture, distribution, and destruction of pseudo narcotic training aids. According to the memorandum, POEs should destroy pseudo training aids older than 1 year to prevent the unintentional training of a novel

As of April 2020, OFO leadership instructed CBP ports of entry to destroy pseudo training aids older than 1 year. Therefore, POEs should not have pseudo [REDACTED] and [REDACTED] aids for their canine task-related training.

⁸ Of the 503 deployed OFO NCP canine teams, 43 were currency and firearms detection canine teams who do not train with pseudo.

⁹ Current pseudo training aids are those that have not reached the end of the 4-month replacement cycle.



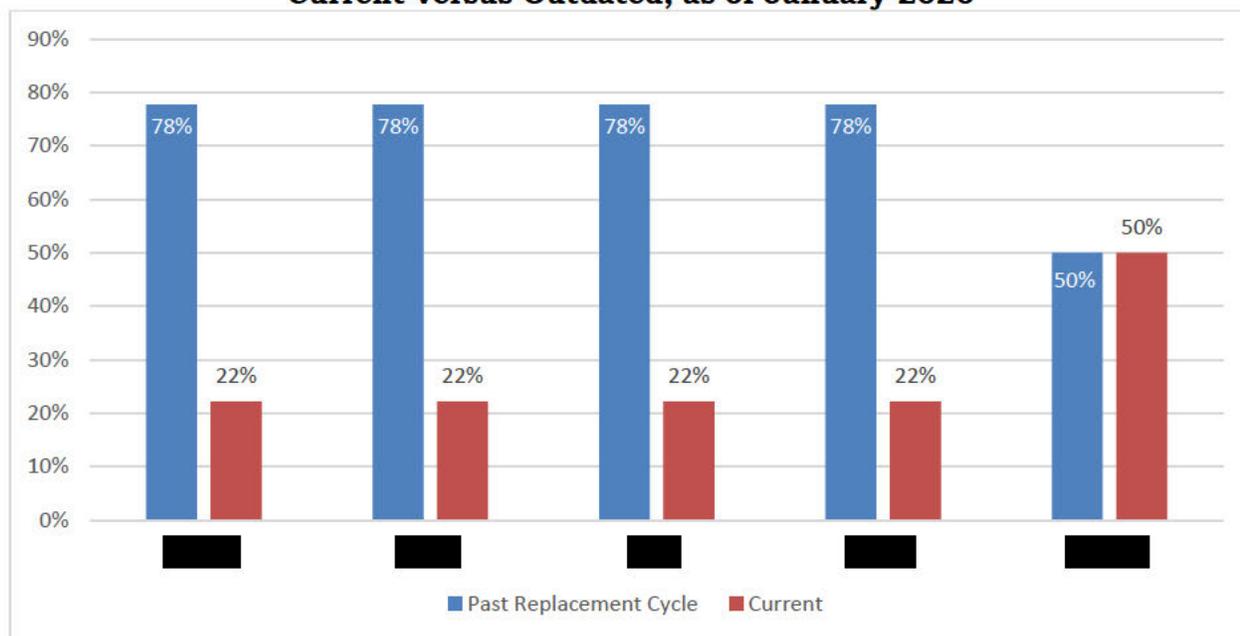
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odor. However, the memorandum does not include a plan on how to promptly replace outdated pseudo narcotics.

Canine Teams Trained with Outdated Actual Narcotic Aids

We visited six POEs and three Border Patrol sectors¹⁰ and found approximately 78 percent¹¹ of the Border Patrol and OFO NCP canine teams in the field were conducting their proficiency training with actual narcotic training aids that were past their replacement cycle, as shown in Figure 8.

Figure 8. Percent of Actual Narcotic Training Aids Current versus Outdated, as of January 2020



Source: OIG analysis of site visit actual narcotic training aids
Note: Fentanyl percentages represent OFO use only.

We contacted LSSD, which is the scientific arm of CBP that makes the actual narcotic training aids for the canine teams, to discuss when narcotic training aids should be replaced. In 2017, LSSD, Border Patrol, OFO, and OTD signed a Memorandum of Understanding (MOU) in which all parties agreed to replace actual narcotic training aids every 2 years. According to LSSD officials, the replacement dates of narcotic training aids are important because of the degradation of the narcotics. However, neither the *OFO Canine Enforcement Program Handbook* nor the *2020 U.S. Border Patrol Canine Unit Policy and*

¹⁰ Within the three Border Patrol sectors, we visited five stations and/or checkpoints.
¹¹ The 78 percent does not include the fentanyl training aids because Border Patrol does not train its canines to detect fentanyl.



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Procedures state how often narcotic training aids should be replaced. In addition, LSSD had not completed any tests or studies to determine the effectiveness of narcotic training aids based on age and when they should be replaced. Finally, CBP had not established serviceable life for the fentanyl training aids OFO used and did not know when OFO should replace the aids.

OFO NCP Was Not Properly Documenting Proficiency Training

OFO NCP canine teams did not have required proficiency training documents in their team files. According to Border Patrol and OFO guidance, once a pay period, certified canine instructors are to document canine training on the CBP *Performance Standards Score Sheet* (Form 1250), which is physically maintained in the canine team files. (See Appendix C for a sample Form 1250.)

During our site visits, we reviewed 28 Border Patrol and OFO NCP canine team files. Of those, 43 percent (12 of 28) of the files did not have Form 1250s to verify completion of proficiency training. A CBP Canine Program manager said the field office had a limited number of instructors to ensure all teams received and documented their training. In fact, three of the six POEs we visited did not have a certified canine instructor.

Inadequate Oversight of Proficiency Training

CBP Canine Program management did not provide adequate oversight to ensure refreshed training aids were available timely and certified canine instructors were available to properly document proficiency training. Both Border Patrol and OFO NCP used outdated actual narcotic aids for proficiency training in the field because CBP Canine Program management did not ensure canine teams promptly received and refreshed these required training aids. In particular, according to the 2017 MOU, Canine Program managers were supposed to request actual narcotic training aids from LSSD twice a year. However, the LSSD Canine Training Aid Program faced challenges fulfilling these requests due to the limited availability of narcotics, as well as insufficient staff. In addition, LSSD did not know the baseline volume of narcotics the components needed annually, which would help planning for requests. Finally, CBP Canine Program management had not developed a delivery schedule for Border Patrol sectors or OFO field offices to sustain and refresh training aids.

Furthermore, CBP Canine Program management did not ensure adequate production and distribution of replacement pseudo narcotic training aids used in OFO NCP proficiency training. Historically, OTD Materials Controls Specialists produced pseudo narcotic aids for all OFO field offices, but after all the specialists retired in 2015, management did not fill their vacated positions.



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According to OFO Canine Program management, this created a gap in production of the training aids. Since April 2016, OFO had detailed officers to CCFR to produce pseudo narcotic training aids for the field on three occasions in the absence of Materials Controls Specialists. Canine Program management officials said that operational requirements had delayed consistently sending OFO officers to CCFR for the production of pseudo training aids. According to CBP, as of April 2020, it is transitioning production and distribution of replacement pseudo narcotic training aids from OTD to LSSD. LSSD was to work with OFO to establish appropriate manufacturing and shipping schedules to ensure regular replacements for the pseudo training aids.¹²

OFO management did not adequately oversee the certified canine instructors to ensure they conducted and properly documented canine training to validate its completion. Such oversight would include routine communication with instructors in the field to ensure they were complying with program guidance and meeting all training-related requirements. For example, we visited multiple OFO POEs without instructors, which caused canine teams to sacrifice required proficiency training. CBP Canine Program management also did not have a process to ensure enough instructors were in the field to meet OFO NCP canine team training needs. During our site visit to an OFO POE, no instructor was available to provide break-in training for multiple, newly deployed canine teams, therefore delaying their operational use.

CBP Had Inadequate Governance for Its Canine Team Operations

According to the GAO *Standards for Internal Control in the Federal Government*, an effective way to achieve accountability is to implement control activities through policies.¹³ Per the standards, management should communicate to personnel the policies and procedures so that the personnel can implement the control activities for their assigned responsibilities. CBP's inadequate governance of canine team operations led to outdated Canine Program policies and procedures, inconsistent training-document retention periods, and an absence of K9TS policies and procedures. We attribute CBP's inadequate governance to CBP Canine Program management not prioritizing program management as other challenges took precedence.

¹² Memorandum titled, "Pseudo Narcotics for Canine Training Aids," April 2020.

¹³ GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014, *Principle 12 – Implement Control Activities*.



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Outdated Canine Program Policies and Procedures

At the time of our fieldwork, Border Patrol and OFO NCP Canine Program policies and procedures had not been updated in more than 9 years, despite changes in the operational environment. During our audit, CBP had not updated the *Border Patrol Canine Unit Policy and Procedures* since 2010. However, at the completion of our fieldwork, Border Patrol issued an updated *Border Patrol Canine Unit Policy and Procedures*. Border Patrol's 2020 policy still did not include a timeframe or process for knowing when actual narcotic training aids are outdated or for refreshing the training aids. The *OFO Canine Enforcement Program Handbook*, which was last updated in 2002, was missing information and included some outdated information. For example, the handbook did not mention or include guidance regarding fentanyl aids deployed to the field in 2017. In addition, according to the handbook, OTD should provide narcotic training aids for the field, but LSSD has been producing and distributing training aids.

Inconsistent Retention Periods for Maintaining Training Documents

Border Patrol stations and OFO field offices did not use the same record retention schedule. To illustrate, OFO did not document its rationale for its record retention policy, which is inconsistent with the General Records Schedule. The General Records Schedule provides authority for records common to many Federal agencies and specifically states canine service records should be destroyed when superseded, obsolete, or 3 years after the canine is released from service, whichever is sooner. According to the *OFO Canine Enforcement Program Handbook*, offices should maintain training records for a minimum of 90 days. OFO modified its record retention policy to 90 days because it placed more emphasis on annual certification than on proficiency training results. OFO leadership at one POE explained it kept canine proficiency training records longer than necessary to support local court cases; CBP could lose cases if it could not provide adequate training records.

Furthermore, OFO did not consistently maintain proficiency training documents. During our fieldwork visits, training documentation maintained by OFO field offices was either missing or insufficient to demonstrate the completion of required proficiency training. OFO field offices were not following their policies for maintaining adequate training records for a minimum of 90 days. For example, during our site visits, we reviewed 16 OFO NCP canine team files. Of those files, 75 percent (12 of 16) did not have Form 1250s to verify completion of proficiency training. Although the 2020 *Border Patrol Canine Unit Policy and Procedures* does not include document retention



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periods, all stations we visited simply kept training documents for the life of the canines.

No Guidance on Standard Use of K9TS

CBP has not issued policies and procedures to ensure standard use of K9TS, which is a web-based depository of CBP canine data for canine officers, canine supervisors, and field canine advisors. Canine handlers use K9TS to access monthly records of seized illegal or prohibited items, utilization statistics, certifications and certification dates, health and veterinarian appointments and information, microchip numbers, vaccination records, temporary duty assignments, and photos of canines. Canine handlers did not always record accurate seizure and veterinarian data in K9TS. For example, when evaluating data for OFO Agriculture canines, we identified inflated seizure statistics on detected, prohibited produce and/or meats, which could lead management to make ill-informed decisions on allocating canine resources and when requesting additional funding from Congress. In addition, during our site visits to three Border Patrol sectors and six POEs, we observed OFO Agriculture staff recording training hours for their canines in K9TS. Conversely, Border Patrol and OFO NCP did not record any training information at all. Lastly, we found canine veterinarian records in K9TS that were not as up-to-date as supporting medical documents.

Management Did Not Prioritize the Canine Program

CBP's inadequate governance of the Canine Program is attributed to not prioritizing the program due to other challenges that took precedence. CBP management's oversight and leadership to both the Border Patrol and OFO Canine Programs provide guidance and support to southern border operations. Since 2014, CBP has experienced a dramatic increase in migrants along the Southwest border, which has resulted in overcrowded detention facilities and prolonged processing times for migrants. According to CBP Officials, increased attention to these issues has reduced CBP's attention to Canine Program operations. For example, CBP closed selected Border Patrol checkpoints, reallocating canine handlers to help with other duties such as processing migrants. CBP also moved more than 700 OFO officers from POEs to help Border Patrol process the surge of apprehended migrants. Additionally, Southwest Border Patrol sector chiefs reassigned canine handlers to help process migrants, therefore requiring the handlers to kennel their canines. Given these other priorities, Canine Program management did not have the support needed to develop and issue updated policies on canine operations and implement standards for using K9TS.



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Conclusion

CBP's canine teams play a vital role in detecting people, illicit goods, and prohibited agricultural items from entering the country illegally. However, without a comprehensive plan for realignment, proper training, and updated and consistent program guidance, the CBP Canine Program has not been able to achieve desired growth or operate as intended. Because it did not adequately plan for or analyze the performance enhancing benefits of realigning its canine training curricula, CBP could not adequately justify the realignment and ensure it met the needs of Border Patrol and OFO.

Additionally, CBP did not ensure its canine teams were adequately trained in the field to achieve their mission. Using training aids that were contaminated or past their recommended replacement cycle can be counterproductive to canines' detection capabilities. Canines that cannot detect odors accurately and consistently put the Nation at significant risk of prohibited items crossing our borders. Therefore, CBP needs to ensure canine teams have a regularly refreshed supply of training aids.

Finally, without updated policies and guidance, the Canine Program may not be able to reliably inform management about where to best deploy canine teams. Unclear guidance and outdated policies could lead to ineffective canine teams. Ultimately, CBP cannot ensure its training approach and execution allows its canine teams to accomplish their mission of detecting smuggling of illegal narcotics, unreported currency, firearms, agriculture products, and humans into the country at and between ports of entry as effectively as possible.

Recommendations

Recommendation 1: We recommend the Office of Training and Development Assistant Commissioner develop a comprehensive assessment of the realignment of the Canine Program to ensure implementation according to the Office of Training and Development's training standards. The assessment should:

- ensure the training curriculum aligns with component policies, strategic plans, and if applicable, specific Canine Program strategic plans; and
- evaluate post-graduation performance measures to validate efficiency and effectiveness of the component specific objectives and curriculum to demonstrate continual improvement in the canine training program.



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Recommendation 2: We recommend the U.S. Border Patrol Chief and Office of Field Operations Executive Assistant Commissioner ensure the Canine Program has enough certified canine instructors and adequate training aids to provide proficiency training for canines after they are deployed. This should include:

- implementing a process to ensure sufficient staff are available to provide all training needs to U.S. Border Patrol and the Office of Field Operations canine teams; and
- creating a systemic schedule and plan for pseudo and actual narcotic replacement for every U.S. Border Patrol sector and Office of Field Operations field office within the time recommended by the Laboratories and Scientific Services Directorate. (See Recommendation 3.)

Recommendation 3: We recommend the Executive Director of the Laboratories and Scientific Services Directorate conduct a study to determine the appropriate time for replacement of pseudo and actual narcotics to limit the constant expiration of these training aids. Pseudo and actual narcotic replacement cycles should be updated according to the results of the Laboratories and Scientific Services Directorate study.

Recommendation 4: We recommend the U.S. Border Patrol Associate Chief of Law Enforcement Operations and Office of Field Operations Director of Tactical Operations update the Canine Program policies to provide adequate oversight to ensure program needs are being met. The policies should include:

- record retention timelines for all training documents to be consistent with the CBP Records General Schedule or provide adequate documentation on retention policies after consultation with record retention personnel to determine the appropriate approach;
- a systematic schedule and plan for pseudo and actual narcotic training aids (see Recommendation 2.); and
- development of standard operating policies, procedures, and quality assurance measures for use of the Canine Tracking System.

CBP Response and OIG Analysis

CBP concurred with all four of our recommendations and is currently taking actions to address them. Appendix B contains a copy of CBP's management comments in their entirety. CBP also provided technical



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comments and suggested revisions to our report in a separate document. We reviewed the technical comments and made changes to the report where appropriate. We consider recommendations 1, 2, and 3 resolved and open. We consider recommendation 4 unresolved and open. A summary of CBP's responses and our analysis follows.

CBP Response to Recommendation 1: CBP concurred with the recommendation. The Border Patrol and OFO will provide applicable policies and strategic planning documents to OTD. Additionally, Border Patrol and the OFO NCP will assist OTD with post-graduation performance measures to validate efficiency and effectiveness of component-specific objectives and continued improvement of the canine training program. Estimated Completion Date (ECD): October 31, 2021.

OIG Analysis of CBP Comments: OTD has taken steps to satisfy the intent of this recommendation with the assistance of Border Patrol and the OFO NCP. We consider this recommendation resolved, but it will remain open until OTD has provided documentation to support that all recommendation actions are completed.

CBP Response to Recommendation 2: CBP concurred with the recommendation. Border Patrol officials asserted their 471 canine instructors are capable of providing the required training and accompanying documentation. Border Patrol will improve applicable training documentation and processes to include adding the instructor-to-student ratio of 1:5; standardizing the training aid acquisition, establishing an automatic training aid replenishment system; and coordinating with LSSD on courses of action.

Separately, OFO will implement a process to ensure sufficient staff are available to provide oversight of field canine training and will establish procedures and a mechanism for regular training aid replacement within the prescribed timeframes established by LSSD. ECD: October 31, 2021.

OIG Analysis of CBP Comments: Border Patrol and the OFO NCP are taking action to ensure sufficient certified instructors are available to provide proficiency and maintenance training. In addition, Border Patrol and OFO have committed to establishing procedures and a mechanism to replenish training aids within the timeframes established through collaboration with LSSD. We consider this recommendation resolved, but



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it will remain open until Border Patrol and OFO provide documentation to support that all planned corrective actions are completed.

CBP Response to Recommendation 3: CBP concurs with the recommendation. LSSD will work with Border Patrol, OFO, and OTD canine components to collect and replace training aids that are nearing, or past, their recommended replacement dates. LSSD will create a standard operating procedure that outlines the actions needed for this study and begin collection of training aids by January 31, 2021. LSSD will perform chemical testing on those collected aids to determine whether noticeable changes are present that may be detrimental to the aids' effectiveness. By June 30, 2021, LSSD anticipates completing analysis and assessment. LSSD will update policies and procedures with training aid lifecycles based on scientific results, risk-minimization, and practicality with the CBP canine components. ECD: September 30, 2021.

OIG Analysis of CBP Comments: The steps outlined by LSSD satisfy the intent of this recommendation. We consider this recommendation resolved, but it will remain open until LSSD provides documentation to support that all planned corrective actions are complete.

CBP Response to Recommendation 4: CBP concurred with the recommendation. Border Patrol and OFO will collaborate on specific policies that define the appropriate retention timeframe for Border Patrol and OFO canine documents, and will collaborate with LSSD to establish a narcotic replacement standard operating procedure. Border Patrol will establish policies for the use of the Canine Tracking System.

The OFO NCP will update policies to ensure adequate oversight and program needs are met, to include appropriate records retention in accordance with the agency records management plan.
ECD: October 31, 2021.

OIG Analysis of CBP Comments: Both Border Patrol and OFO have taken steps to satisfy the intent of this recommendation. However, OFO's corrective action does not establish policies for consistent use of the Canine Tracking System. We consider this recommendation unresolved and open. It will remain open until OFO clarifies how it will meet all facets of the recommendation and both Border Patrol and OFO provide documentation to support that all elements of this recommendation have been implemented.



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Appendix A

Objective, Scope, and Methodology

The Department of Homeland Security Office of Inspector General was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

We conducted this audit to determine to what extent CBP's canine training approach and execution support the Canine Program mission. To achieve our audit objective, we:

- reviewed the policies, procedures, handbooks, directives, training curriculum, memoranda, and muster documents related to CBP's Canine Program and academy;
- interviewed CBP Headquarter officials from Border Patrol Law Enforcement Operations, OFO's Tactical Operations and Agriculture Program Trade and Liaison, and OTD to gain an understanding of the Canine Program;
- interviewed CBP officials (canine supervisors, advisors, certified canine instructors, handlers) in the field from Border Patrol, OFO, and OTD to gain an understanding of the Canine Program;
- observed the initial training course and interviewed officials, supervisors, and instructors at CCEP, CCFR, and the National Detector Dog Training Center to gain an understanding of their roles and responsibilities and how training and certification tests are conducted;
- reviewed the memorandum of understanding among CBP subcomponents (LSSD, Border Patrol, OFO, and OTD) relating to actual narcotic training aids;
- observed maintenance training, task-related training, and non-task-related training in the field to gain an understanding of the proficiency training and use of the performance standards score sheet; and
- interviewed LSSD officials from Headquarters and the Houston Laboratory to gain an understanding of their role and responsibilities relating to actual narcotic training aids for canine teams.

We obtained lists of all CBP canine teams deployed throughout the United States. We judgmentally selected air and land POEs and stations along the southern and northern borders to conduct site visits. Additionally, we developed a data collection instrument to document when and what training aids (pseudo and actual narcotic) canine teams used, and observed how



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training aids were stored and maintained. We conducted site visits to certain Border Patrol Stations and POEs within the following locations:

- Laredo Field Office (Laredo POE)
- Laredo Sector (Laredo North and Hebbronville Border Patrol Stations)
- Tucson Field Office (Nogales and Douglas POE)
- Tucson Sector (Border Patrol Tucson Sector Canine Unit and I19 Border Patrol Checkpoint)
- Seattle Field Office (Seattle-Tacoma International Airport and Blaine POE)
- Blaine Sector (Bellingham Border Patrol Station)
- Atlanta Field Office (Hartsfield-Jackson International Airport)
- El Paso Field Office (El Paso and Santa Teresa POE)
- El Paso Sector (Ysleta Border Patrol Station and El Paso Canine Facility)

We assessed the reliability of CBP's K9TS system by verifying documents such as team certifications and veterinarian records from CBP's physical canine teams hard copy file. We obtained 3 months of OFO canine team seizure and utilization reports to compare them to the data stored in K9TS. We requested system standard operating procedures, and inquired with officials about access and user controls and determined there are no procedures for users or data validation. We performed limited data reliability testing. CBP components are not consistently and accurately inputting data, such as seizure data, into K9TS, which limits an adequate and comparative assessment of the reliability of K9TS data. Based on our review, we concluded the data was of undetermined reliability, and we did not rely on the data from the system to support findings, conclusions, or recommendations in this report.

We analyzed the CBP Canine Academy graduation data in comparison with the National Training Plan. We assessed the reliability of the graduation data by: (1) reviewing existing information about the data and the system that produced them, (2) interviewing agency officials knowledgeable about the data, and (3) observing agency officials pull requested documents from official system of records to compare with data provided. We determined that the data was sufficiently reliable for the purpose of this report.

We reviewed CBP's internal controls over processes for the Canine Program by observing control activities and comparing them to standard operating procedures. However, we identified the Canine Program had outdated policies and handbooks, pseudo and actual narcotic training aids past the recommended replacement cycle, inconsistent proficiency training documentation, and did not have operating procedures for K9TS. Therefore, we



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determined the controls were insufficient and not supported by standard operating procedures.

We conducted this performance audit between June 2019 and May 2020 pursuant to the *Inspector General Act of 1978*, as amended, and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.



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Appendix B
CBP Comments to the Draft Report

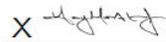
1300 Pennsylvania Avenue NW
Washington, DC 20229



**U.S. Customs and
Border Protection**

November 30, 2020

MEMORANDUM FOR: Joseph V. Cuffari, Ph.D.
Inspector General

FROM: Henry A. Moak, Jr. 11/30/2020
X 
Senior Component Accountable Official
U.S. Customs and Border Protection

SUBJECT: Management Response to Draft Report: "CBP Needs to Improve
the Oversight of its Canine Program to Better Train and
Reinforce Canine Performance"
(Project No. OIG-19-058-AUD-CBP)

Thank you for the opportunity to comment on this draft report. U.S. Customs and Border Protection (CBP) appreciates the work of the Office of Inspector General (OIG) in planning and conducting its review and issuing this report.

CBP is pleased that OIG's report recognizes the important role CBP's canine teams have in securing our Nation's borders and the value they add to CBP's operational effectiveness. CBP annually certifies and documents canine team proficiency to ensure continued compliance with CBP's highest training standards and policies in the Canine disciplines, which provides CBP with the tools it needs to secure our Nation's borders. It is important to also highlight, however, that the OIG's audit was conducted during a major transition period for CBP's canine program. Specifically, on August 19, 2019, the CBP Commissioner approved a realignment of the two training centers within the Office of Training and Development (OTD) to better support the Office of Field Operations (OFO) and U.S. Border Patrol (USBP), moving away from an integrated canine program that was in operation for almost a decade.

CBP Canine training occurs both at Training Centers in El Paso, TX, and Front Royal, VA, as well as on-the-job in various locations across the U.S. Within the structure of the CBP Canine Program, OTD is responsible for the training programs at the Training Centers, while OFO and USBP are responsible for their canine programs and the on-the-job training needed to keep canines performing at peak levels.



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Throughout the last year, CBP made several changes to improve the canine program, including: (1) realigning the training curricula and created two new basic canine handler courses that better reflect the different operating environments between OFO and USBP; (2) creating two new organizational structures, which took effect in October 2020, and are currently staffed by OFO and USBP instructors, to support on-site Training Center future training demands; (3) working with CBP's Laboratory and Scientific Services Directorate (LSSD) and OFO to transfer pseudo narcotic development in April 2020; and (4) changing the canine contract to procure sporting breed dogs in support of OFO's requirements.

In addition, USBP identified a workgroup of field canine coordinators to (1) update its canine program's table of organization, maintenance training staffing requirements, and national canine handler announcements; and (2) propose an update to the memorandum of understanding for narcotic training aid acquisition from LSSD. USBP is also working with the OTD to create nine new GS-1896, Border Patrol Enforcement positions and thus increase the annual training throughput of canines to mitigate attrition.

The USBP Canine Program continues to be USBP's program with the highest return on investment. During fiscal year (FY) 2019, canine teams represented 4 percent of the USBP workforce, and accounted for 38 percent of all USBP seizures. To further emphasize training compliance beyond the K9TS Recertification-Reminders, USBP is working to implement a quarterly report forecasting expiring re-certifications to improve scheduling of mandatory training.

CBP OFO operated its canine enforcement program for more than 50 years. The efforts in program oversight have advanced throughout the years, and OFO remains committed to the continual improvement of the program and value provided by the canine teams themselves. In FY 2020, for example, the OFO enforcement canine teams contributed to the interception of illicit narcotics, currency, and firearms, yielding an impressive return on investment for the organization and for the safety and security of the nation at its borders. CBP remains committed to canine training and reinforcing canine proficiency in its canine programs.

The draft report contained four recommendations, with which CBP concurs. Attached find our detailed response to each recommendation. CBP previously submitted technical comments addressing several accuracy, sensitivity, and contextual issues under a separate cover for OIG's consideration.

Again, thank you for the opportunity to review and comment on this draft report. Please feel free to contact me if you have any questions. We look forward to working with you again in the future.

Attachment



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**Attachment: Management Response to Recommendations
Contained in OIG-19-058-AUD-CBP**

OIG recommended that the OTD Assistant Commissioner:

Recommendation 1: Develop a comprehensive assessment of the realignment of the Canine Program to ensure implementation according to the Office of Training and Development's training standards. The assessment should:

- ensure the training curriculum aligns with component policies, strategic plans, and if applicable, specific Canine Program strategic plans; and
- evaluate post-graduation performance measures to validate efficiency and effectiveness of the component specific objectives and curriculum to demonstrate continual improvement in the canine training program.

Response: Concur. The OFO National Canine Enforcement Program (NCEP) will provide component policies, the CBP strategic plan, and the NCEP-specific strategic plan to OTD, and USBP will provide relevant parts from the USBP 2020 Strategic Plan to OTD. OFO NCEP and the USBP Canine Program will also assist OTD on post-graduation performance measures to validate efficiency and effectiveness of component-specific objectives and continued improvement of the canine training program. Estimated Completion Date (ECD): October 31, 2021.

OIG recommended that the USBP Chief and OFO Executive Assistant Commissioner:

Recommendation 2: Ensure the Canine Program has enough certified canine instructors and adequate training aids to provide proficiency training for canines after they are deployed. This should include:

- implementing a process to ensure sufficient staff are available to provide all training needs to U.S. Border Patrol and the Office of Field Operations canine teams; and
- creating a systemic schedule and plan for pseudo and actual narcotic replacement for every U.S. Border Patrol sector and Office of Field Operations field office within the time recommended by the Laboratories and Scientific Services Directorate. (See Recommendation 3.)

Response: Concur. USBP has 896 active canine teams, and 471 canine instructors consisting of: (1) 305 Concealed Humans Narcotics Detection Instructors; (2) 88 Track & Trailing Instructors; (3) 40 Search & Rescue Instructors; and (4) 38 Patrol Instructors. Furthermore, of these 471 instructors, 107 are multi-discipline instructors. The total number of instructors can provide the required canine maintenance training and



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accompanying documentation. To ensure compliance with record retention and training documentation, USBP will update Chief Fisher's Memorandum, dated August 13, 2014, entitled "Importance of Accurate Canine Training Paperwork," and include an instructor to student ratio of 1:5.

Additionally, USBP will (1) further standardize the narcotics training aid acquisition process beyond the two-year period recommended by LSSD for training aid replacement, (2) pursue the establishment of a training aid replenishment mechanism that will be automatic, operating by geographical location following a requirements structure that considers components and training centers, and (3) collaborate with LSSD with this suggested course of action.

In addition, OFO will implement a process to ensure sufficient staff are available to provide oversight of field canine training, and will further establish procedures to regularly refresh training aids within prescribed timeframes as established by LSSD. ECD: October 31, 2021

OIG recommended that the Executive Director of the LSSD:

Recommendation 3: Conduct a study to determine the appropriate time for replacement of pseudo and actual narcotics to limit the constant expiration of these training aids. Pseudo and actual narcotic replacement cycles should be updated according to the results of the Laboratories and Scientific Services Directorate study.

Response: Concur. LSSD will work with OFO, USBP, and OTD canine components to collect and replace pseudo and actual narcotic training aids that are nearing, or past, their recommended replacement dates. Using the training aids that were subject to CBP's working environments, LSSD will perform chemical testing to determine if noticeable changes are present in the training aids that may be detrimental to their effectiveness. As the results are compiled and compared with the age and working conditions of the various training aids, LSSD will work to update training aid lifecycles based on scientific results, risk-minimization, and practicality with the CBP canine components.

LSSD will also create a Standard Operating Procedure (SOP) that outlines the actions needed for this study and begin collection of training aids near or past the recommended replacement date, by January 31, 2021. By June 30, 2021, LSSD anticipates completing analysis and assessment of pseudo and actual narcotic training aids that are nearing or past their recommended replacement dates. Finally, by September 2021, LSSD will finalize policy and procedures with updated lifecycle timeframes and implement these procedures for operational effectiveness. ECD: September 30, 2021



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OIG recommended that the USBP Associate Chief of Law Enforcement Operations and OFO Director of Tactical Operations:

Recommendation 4: Update the Canine Program policies to provide adequate oversight to ensure program needs are being met. The policies should include:

- record retention timelines for all training documents to be consistent with the CBP Records General Schedule or provide adequate documentation on retention policies after consultation with record retention personnel to determine the appropriate approach;
- a systematic schedule and plan for pseudo and actual narcotic training aids (See Recommendation 2.); and
- development of standard operating policies, procedures, and quality assurance measures for use of the Canine Tracking System.

Response: Concur. USBP and OFO will collaborate on specific policies that define the appropriate retention timeframe for USBP and OFO canine documents, and will both also collaborate with LSSD to establish a narcotic replacement SOP. Additionally, USBP will establish policies for the use of the Canine Tracking System.

The OFO Enforcement Canine Program will update policies to ensure adequate oversight and ensure program needs are being met, to include appropriate records retention in accordance with the agency records management plan. ECD: October 31, 2021.



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Appendix C CBP Performance Standards Score Sheet (Form 1250)

DEPARTMENT OF HOMELAND SECURITY
 U.S. Customs and Border Protection
 Canine Program

DETECTION CANINE STUDENT PERFORMANCE STANDARDS SCORE SHEET

STUDENT: _____ DATE: _____
 CANINE: _____ CBP ID #: _____

	HANDLER				CANINE				SEARCH				Location							
	Ritual	Search Skills	Leash hand	Voice/Tones	Speed	Reading Canine	Reward	Control	Hunt	Alert	Indication	Confidence		Search Type	Placement	Search Time	Substance	Amount	Height	Depth
1																				
2																				
3																				
4																				
5																				
6																				
7																				
8																				
9																				
10																				
11																				
12																				
13																				
14																				
15																				
	Daily Average																			

P.I.U. _____ Record Keeping: _____ Grooming: _____ Vehicle: _____
 Aid Prep: _____ Knowledge: _____
 Communication Skills: _____ Presentation: _____ Problem Solving: _____

Comments: _____

Instructor(s) _____ Date _____ Student _____ Date _____

CBP/CP Form 1250 (09/15)



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Appendix D
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Enrique Leal, Auditor
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Hope Wright, Independent Referencer
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Kelly Herberger, Supervisory Communications Analyst



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