U.S. CUSTOMS AND BORDER PROTECTION DIRECTIVE

CBP DIRECTIVE NO. (b) (2)                    DATE: December 11, 2008
ORIGINATING OFFICE: (b) (2)                   SUPERSEDES: (b) (2)
REVIEW DATE: December 2011

SUBJECT: SELF-INSPECTION PROGRAM

1. PURPOSE. This directive establishes policy and assigns responsibility for the administration and implementation of the U.S. Customs and Border Protection (CBP) Self-Inspection Program (SIP).

2. POLICY.

2.1 All CBP managers are responsible for ensuring that resources under their purview are used efficiently and effectively, and that programs, functions and activities are discharged with integrity and in compliance with applicable laws, regulations and policies.

2.2 The SIP is one of the mechanisms through which CBP monitors the performance of agency programs, operations, and offices. Established to promote management accountability and operational integrity, SIP compliments other internal control monitoring activities that include ongoing management oversight, systematic monitoring, focused inspections, periodic audits and inventories, and other review activities.

2.3 CBP office directors and managers will perform annual self-inspections and report on the implementation of agency policies and procedures applicable to the operational, financial, and administrative functions selected for review through SIP. In completing self-inspections managers will provide a candid evaluation of the office’s operational performance that will include reporting whether their office is operating in compliance with established CBP policies and procedures.

2.4 The SIP emphasizes internal self-assessment and places responsibility for assessing operational compliance and performance, and when applicable, identifying and implementing corrective actions to address identified deficient conditions, on the CBP manager(s) responsible for the operation of the office.

2.5 Analysis of SIP data will allow CBP executive managers and national program managers to: gauge the level of compliance with critical operational policies and procedures; examine the issues or underlying cause of reported instances of non-compliance; and identify programmatic areas of concern that require national attention.


4. DEFINITIONS.

4.1 Internal Controls: The policies and procedures, usually established in management directives and handbooks, developed to guide CBP managers and employees, accomplish desired operational goals and outcomes, and protect organizational resources from waste, fraud, or mismanagement.

4.2 Self-Inspection Worksheets: The SIP documents containing questions concerning the implementation of specific operational, financial, and administrative policies and procedures that CBP managers and supervisors utilize to conduct self-inspections. Universal worksheets cover organizational functions (e.g., physical security, property management) that are common to each CBP organizational component. Operational worksheets cover functions (e.g., Private Air Program, seized property management) specific to a particular CBP organizational component(s).

4.3 Self-Inspection Reporting System (SIRS): The CBP automated system used for: the assignment of self-inspection worksheets; input, certification and approval of self-inspection worksheets; and recording and tracking of corrective actions. The SIRS serves as the repository of self-inspection worksheets and annual reporting results.

4.4 Target Respondent: The accountable manager (e.g., Port Director, Sector Chief, Division Director) responsible for the completion of a self-inspection worksheet.

4.5 Certifying Official: The manager or supervisor that certifies the accuracy of reported self-inspection worksheet results, and as applicable, the corrective actions proposed to address any reported non-compliance with CBP policies or procedures.

4.6 Approving Official: The manager or supervisor that reviews, concurs with the reported self-inspection worksheet results and content, and approves the certified worksheet.

4.7 Researcher: A supervisor or employee who performs self-inspection activities on behalf of a certifying official that is used to complete a self-inspection worksheet.

5. RESPONSIBILITIES.

5.1 The Director, Office of Internal Affairs, Management Inspections Division (MID), is responsible for the overall administration and implementation of SIP and SIRS. The Director’s duties include:

5.1.1 Establishing program policy, providing procedural guidance and training pertaining to SIP and SIRS, and promoting program awareness among CBP executive managers, program managers, office managers and supervisors, and other stakeholders.
5.1.2 Ensuring coordination with CBP Headquarters office designated SIP Coordinators, including providing direction pertinent to the development of self-inspection worksheets.

5.1.3 Maintaining SIRS, ensuring the timely entry of self-inspection worksheets into SIRS, activating SIRS to begin each self-inspection reporting cycle, and providing self-inspection reporting results recorded in SIRS to CBP Headquarters executive offices at the end of each reporting cycle.

5.1.4 Providing CBP Headquarters executive managers with a Summary Analysis Report at the conclusion of each self-inspection cycle that provides information concerning the participation and self-inspection reporting results.

5.1.5 Maintaining and implementing a SIP Validation Program to evaluate the effective implementation of the program and accuracy of reported self-inspection results.

5.1.6 Periodically assessing SIP and SIRS and implementing enhancements that will increase the value of the program and/or enhance the automated reporting system.

5.2 Headquarters Executive Managers (e.g., Assistant Commissioners, Chief of Border Patrol, and other Executive Directors) are responsible for:

5.2.1 Ensuring the effective and uniform implementation of SIP within their respective office, including as applicable, all component divisions and field offices under their authority.

5.2.2 Designating a SIP Coordinator to serve as a liaison with MID and coordinate implementation of the program among all organizational components of the office.

5.2.3 Developing and maintaining self-inspection worksheets for the programs, processes, or organizational functions their office is responsible for that are selected for review through SIP.

5.2.4 Ensuring an annual review of self-inspection worksheets developed by their office is performed to determine: which, if any, worksheets should be deactivated; what worksheet revisions are required; and what additional worksheets should be developed for programs, processes, or organizational functions that warrant review through SIP.

5.2.5 Determining the need to conduct an analysis or summarize self-inspection reporting results pertinent to their office programs, processes, or functions reviewed through SIP.

5.3 CBP Headquarters Office SIP Coordinators are responsible for:

5.3.1 Serving as a liaison between their office and MID on the implementation and administration of SIP, and overseeing the implementation of SIP by all office component divisions and field offices.

5.3.2 Providing information, direction, and guidance concerning the implementation of SIP and use of SIRS within their office. Providing and/or coordinating SIP and SIRS training for
managers and supervisors within their office; and as applicable, all office components and field offices.

5.3.3 Providing direction to office program managers and coordinating the annual review, revision, and creation of self-inspection worksheets for inclusion in SIP.

5.3.4 Ensuring office executive managers and program managers are aware of SIP requirements and program developments.

5.3.5 Monitoring the implementation of SIP within their office, including ensuring the timely assignment, certification, and approval of all assigned self-inspection worksheets.

5.3.6 Reporting to their executive office manager concerning the results of each annual SIP reporting cycle.

5.3.7 As directed by the executive office manager, coordinating the development of a written annual report or other briefing document summarizing SIP reporting results pertinent to the office programs, processes, or functions selected for review through SIP.

5.4 Office Directors and Managers (CBP Headquarters and Field Offices) are responsible for:

5.4.1 Overseeing implementation of SIP within their office, and as applicable, other offices under their jurisdiction. Ensuring subordinate managers and supervisors are familiar with the requirements of SIP and use of SIRS.

5.4.2 As deemed necessary, developing office procedures to ensure proper implementation of SIP and/or designating an office SIP Coordinator.

5.4.3 Ensuring the appropriate assignment of self-inspection worksheets applicable to the office, and as applicable, other offices under their jurisdiction.

5.4.4 Ensuring the timely and accurate completion of all self-inspection worksheets assigned to the office, and as applicable, other offices under their jurisdiction.

5.4.5 Ensuring the timely certification and, as applicable, approval of all worksheets assigned to their office, and as applicable, other offices under their jurisdiction.

5.4.6 Identifying and reporting the cause of each deficient condition identified during the performance of self-inspection activities; and reporting the timely completing corrective action to address each reported deficient condition.

6. **PROCEDURES.**

6.1 SIP self-inspections will be conducted annually consistent with the following guidelines:

6.1.1 Self-inspection reporting will begin upon activation of SIRS, which will occur on or about April 1 of each year. The period for self-inspection reporting will run from the date of the
activation of SIRS until June 30 of each year, providing a 90-day period for office managers to complete their self-inspection reporting. All self-inspection worksheets must be completed, certified, and approved in SIRS no later than June 30.

6.1.2 Self-inspection reporting will generally cover operations during the 12 month period prior to the current self-inspection cycle; unless the program or requirements subject to self-inspection have been in effect for less than a year.

6.1.3 The review period for each self-inspection worksheet will generally be the 12 month period from the date of completion of the worksheet for the previous self-inspection cycle reporting period to the date of reporting for the current cycle. The review period represents the timeframe from which transaction samples, records, and activities will be reviewed to determine the appropriate response to each worksheet question.

6.2. Each CBP Headquarters Office Executive Manager, or designee, will annually determine the programs, processes, and functions managed by his/her office that warrant review through SIP. Self-inspection worksheets provide a mechanism for capturing agency-wide operational data concerning the implementation of major programs or responsibilities managed by the office.

6.2.1 The determination to include particular operational, financial, and administrative policies and procedures for review through SIP should be made with consideration of the other mechanisms or processes used to monitor implementation.

6.2.2 Self-inspection worksheets will be developed consistent with the following guidance:

6.2.3 Self-inspection worksheets will focus on the implementation of policies and procedures having a significant impact on the accomplishment of the CBP mission, operational strategies, or specific program objectives. In most instances, one worksheet will be developed for the particular program or function; however, in certain instances multiple worksheets may be developed that address different activities.

6.2.4 Self-inspection worksheets will be developed and reviewed annually by the program manager or other subject matter expert knowledgeable concerning each program, process, and function to be included for review through SIP. A program manager or the office SIP Coordinator will be identified as the point of contact for the worksheet established by the office.

6.2.5 Self-inspection worksheets will be designated for use each self-inspection reporting cycle (each year) or alternating cycles (once every two years).

6.2.6 Self-inspection worksheets will include guidance identifying the target respondent responsible for certifying the worksheet and whether the worksheet may be delegated to a subordinate manager or supervisor for certification.

6.2.7 Self-inspection worksheet questions specific to the worksheet topic should be focused on the implementation of the policies and procedures (internal controls) that reflect those critical functions, activities, or responsibilities established to ensure the achievement of desired results.
6.2.8 Self-inspection worksheet questions will be based on CBP policies, procedures, or requirements that have been formally documented and disseminated through management directives, handbooks, or other written materials (e.g., memorandum).

6.2.9 The number of self-inspection worksheet questions should be limited to that required to assess compliance with the critical policies or procedures established for the particular program, process, or function.

6.2.10 Each self-inspection worksheet question must cite the current reference (e.g., regulation, directive, handbook, or memorandum) that establishes the operational responsibility or requirement pertinent to the question. The citation will be included on the worksheet. In the case of directives and handbooks, the citation will include the particular chapter, section, or other reference applicable to the question.

6.2.11 Each self-inspection worksheet question, unless self-explanatory, must include guidance concerning the specific self-inspection activity to be performed to determine the response to the question. Guidance may include providing sampling instructions (e.g., sample size, sample selection).

6.2.12 The development of self-inspection worksheets is a dynamic process. Existing self-inspection worksheets will be reviewed prior to the beginning of each self-inspection cycle to determine what, if any revisions (e.g., revision of questions, updating of question citations) are required. The review should also include determining what worksheets will be deactivated.

6.3 Each CBP office manager will ensure the timely certification and approval of all self-inspection worksheets that are assigned to his/her office. Managers are responsible for completing, certifying and/or approving only those self-inspection worksheets applicable to their office. Self-inspection worksheets will be completed consistent with the following guidance:

6.3.1 The target respondent for each self-inspection worksheet will ensure the timely, accurate, and appropriate completion of each worksheet assigned to them. Where authorized, he/she may select to delegate the completion and certification of assigned worksheets to a subordinate manager or supervisor. Guidance concerning the authority to delegate each worksheet will be identified in the Overall Guidance Section of each worksheet.

6.3.2 Self-inspection worksheets will be completed in accordance with the worksheet guidance and individual worksheet guidance provided on each worksheet. Worksheet question responses will be answered based on the conditions as they exist at the time of the self-inspection.

6.3.3 The certifying official will ensure the timely performance of self-inspection activities pertinent to each self-inspection worksheet assigned to them. Certifying officials may perform the self-inspection activities and report worksheet question responses in SIRS themselves or assign these functions to a researcher(s).

6.3.4 If the performance of the self-inspection is assigned to a researcher, the certifying official will review the worksheet responses and content recorded in SIRS prior to certification and ensure the name of each researcher is recorded on the worksheet completed in SIRS. The
certifying official will coordinate with each self-inspection researcher, as deemed necessary, to discuss worksheet question responses entered in SIRS prior to certification.

6.3.5 The certifying official will ensure appropriate supporting audit trail notes detailing the activities conducted to answer each worksheet questions are recorded on the worksheet completed in SIRS.

6.3.6 The certifying official will ensure that for any self-inspection worksheet question that the office is found to be operating contrary to established policies or procedures, the cause(s) of the deficient condition, a corrective action, and the date (actual or proposed) of implementation of the corrective action is recorded on the worksheet completed in SIRS.

6.3.7 The approving official will review and approve each self-inspection worksheet result certified by a subordinate certifying official.

6.3.8 The approving official will ensure the timely implementation of corrective action to resolve each deficient condition recorded in SIRS.

6.4 SIRS will serve as the electronic repository of annual self-inspection cycle reporting results, including approved worksheet results, audit trail notes, and where applicable, information concerning deficient conditions and corrective actions.

6.4.1 Paper documents and other materials supporting self-inspection worksheet responses reported in SIRS will be maintained on file by the reporting office for a period of three years (from the close of the reporting period).

6.4.2 As the repository of self-inspection results, SIRS allows field managers overseeing several field offices and national program managers the opportunity to query and analyze the results of annual self-inspection results to identify any recurring conditions within their area of responsibility that require attention.

6.5 At the conclusion of each self-inspection reporting cycle, MID will:

6.5.1 Provide self-inspection data to each CBP Headquarters Office SIP Coordinator whose office developed self-inspection worksheets that were active during the cycle. The data will detail the number of offices completing each worksheet and the self-inspection results reported at the worksheet question level.

6.5.2 Prepare a Summary Analysis Report for CBP Headquarters Office Executive Managers that provides information concerning the participation and self-inspection reporting results for the cycle.

6.6 Further analysis of the self-inspection reporting data recorded in SIRS by national program managers or others will enable CBP component offices to examine the issues or underlying cause of reported instances of non-compliance with the programs, processes, and functions they provide direction and oversight for, and as applicable, identify systemic or programmatic areas that require national attention.
7. MEASUREMENT

7.1 Administration and implementation of SIP will be evaluated in part based on:

7.1.1 The timely preparation and submission of self-inspection worksheets by CBP component offices to MID.

7.1.2 The timely input of self-inspection worksheets into SIRS by MID prior to the beginning of each reporting cycle.

7.1.3 The timely activation of SIRS by MID to begin each self-inspection reporting cycle.

7.1.4 The appropriate assignment and timely completion of all assigned self-inspection worksheets by CBP office managers and supervisors.

7.1.5 The timely preparation of a Summary Analysis Report at the conclusion of each self-inspection reporting cycle by MID.

/s/
Commissioner
U.S. Customs and Border Protection