

Customs Internal Affairs

HUMAN RESOURCES GUIDE



USAID
FROM THE AMERICAN PEOPLE



PREPARED BY CT STRATEGIES FOR THE UNITED STATES
AGENCY FOR INTERNATIONAL DEVELOPMENT (USAID)

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ACRONYMS

CBP U.S. Customs and Border Protection

DDI USAID Bureau for Development, Democracy, and Innovation

EMD USAID DDI Center for Economics and Market Development

HR Human Resources

IA Internal Affairs

ICE U.S. Immigration and Customs Enforcement

IT Information Technology

MID Management Inspections Division

OECD Organisation for Economic Co-operation and Development

OGA Other Governmental Organization

SAT Servicio de Administración Tributaria

TCA Trade and Competitiveness Activity

USAID United States Agency for International Development

WCO World Customs Organization

Introduction

Guide Scope

The *Customs Internal Affairs Human Resources Guide* was commissioned by the United States Agency for International Development (USAID) Bureau for Development, Democracy, and Innovation (DDI) Center for Economics and Market Development (EMD). This guide is intended to support the development and improvement of Internal Affairs (IA) units within Customs agencies around the world. It is built with the recognition that IA units face unique challenges with hiring, training, and retention, and it aims to provide a collection of resources and recommendations from experienced experts.

There can be no border security without workforce integrity. Unfortunately, IA units of Customs agencies are often not prioritized over the operational duties of securing borders and facilitating the efficient and legal flow of goods. When resources are scarce, IA may not seem to be an essential component of a functioning Customs agency. Although organizational integrity is a shared responsibility across all component offices within any public agency or department, implementing and maintaining a robust IA division with investigative, inspections, and training capabilities can effectively support proactive efforts to reinforce and enhance ethics and integrity throughout the agency. A robust IA division can also respond to allegations of serious administrative and criminal misconduct that undermine the agency and its reputation and that place the agency, its employees, and its operations at risk.

This guide is intended for the use of Customs agencies, USAID and other development organizations, and implementing partners. Though the recommendations in this guide may be useful for any Customs agency interested in strengthening its capacity to fight corruption and ethics violations and to guarantee the continuity of organizational integrity, the recommendations are specifically designed for use in developing countries.

Guide Instructions

The *Customs Internal Affairs Human Resources Guide* is intended to be viewed as a modular tool. Each section builds upon the previous sections. However, recommendations do not need to be implemented in any particular order.

Due to resource limitations, it may not be feasible to implement all of the guide's recommendations. This is expected. They can be implemented individually, as needed. The guide is intended to be used as a tool kit rather than as a strict blueprint. Some recommendations may need to be modified based on the environment of the implementing party.

The *Customs Internal Affairs Human Resources Guide* offers recommendations on IA and Human Resources (HR) structure, the scope and attributions of an IA unit within Customs, hiring and retention policies, and the informal and formal relationships that IA units may or should facilitate with outside organizations and stakeholders.

Background Information

Context of Customs Internal Affairs Units

Internal Affairs (IA) units (or internal investigations components tasked with similar integrity-related responsibilities) serve as a critical unit within a Customs administration for fostering and preserving operational and workforce integrity. IA units are responsible for ensuring compliance with a Customs agency's internal policies and procedures and for addressing allegations of misconduct and malfeasance. In particular, IA efforts focus on internal corruption activities in which employees may be engaged, noncriminal employee misconduct, and other mismanagement issues related to agency operations and resources. Additionally, an IA office is responsible for internal security, including that of the workforce and the facilities in which agency employees operate. It is also responsible for implementing integrity awareness programs that reinforce workforce integrity and that proactively address the effects of corruption and misconduct on the agency and its employees.

The work performed by the IA unit helps to ensure the integrity of the Customs administration and its operations and works to ensure that the agency and its employees are held to the highest standards of professional conduct and responsibility, thus generating trust and confidence in the organization, its leadership, and its frontline workforce.

Employee integrity is essential within Customs. These employees are entrusted with the power to secure national borders and the supply chain, collect revenues, and facilitate legitimate trade. As a result of this responsibility, corruption, misconduct, and mismanagement can have widespread impacts.

Background of General HR Guides and Support for Customs

The World Customs Organization (WCO) has released several guides targeted at supporting Human Resources (HR) in its service to Customs agencies. Some of these guides can be found below. This Customs Internal Affairs Human Resources Guide differs from previous guides in two ways. First, it focuses specifically on how HR can support IA and how IA's mission may intersect with the duties of HR. Second, it is intended to be used as an accessible tool kit rather than as a fixed set of requirements.

- [WCO Guide to Implementing Competency-Based Human Resource Management in a Customs Administration Environment](#)
- [Presentations and videos from the WCO Regional HR conference](#)
- Resources collected from CBP IA from Mexican and Canadian IA units

Structure

Context

To best understand the role that Human Resources plays in Internal Affairs and in Customs as a whole, it is essential to understand the structures of IA and HR.

Internal Affairs Structure

REPORTING STRUCTURE

IA should report directly to the top leadership of a Customs agency. The public and employees within the broader Customs agency must deem IA to be a serious and impartial body. By reporting directly to the highest power within the agency, the IA division can effectively investigate any individual within the agency. In the situation that the individual whom Internal Affairs reports to is under suspicion, this investigation should be outsourced to federal police or to another government body that exists outside of the Customs chain of command.

To avoid any conflicts of interest or the perception of a conflict of interest, the IA unit should never include an individual responsible for IA funding, hiring, or management. Often, within Customs, a unit sits under an assistant director or an assistant director general, which would be suboptimal in this situation due to the potential for conflicts of interest. In the unfortunate situation where there is alleged misconduct of an assistant director or commissioner, IA must be able to investigate without fear of retribution. If the assistant director or assistant commissioner is responsible for the IA budget or operations, this creates a conflict of interest in which IA may not feel empowered and supported to investigate the allegations to the full extent of the law.

ROLES AND DIVISIONS



The roles and divisions discussed in the following section are intended to be interconnected and should work in collaboration with one another. There may be some circumstances in which, due to staffing and budgetary shortages, it is not possible to have discrete individuals for each of the discussed units. Since most work closely together, it is acceptable to have multiple roles covered by one individual as long as they possess the necessary skills and the time capacity to carry out the duties of the role. The one exception to this is the Management Inspections Division (MID). This division is intended to ensure compliance with policies and the comprehensiveness of policies. It does not handle investigative tasks and tends to be more focused on policy rather than on enforcement. This skill set is inherently different from the other divisions and should remain separate to prevent any potential conflicts of interest between policymakers and investigators.

INTAKE UNIT

The Intake unit creates efficiencies for IA by evaluating and filtering allegations immediately after they are submitted to IA. The exact size of the Intake unit depends on the volume of allegations sent to IA. These professionals are responsible for independently assessing all allegations and determining how to categorize them for the next steps. The Intake unit serves as a single touchpoint for the initial receipt and analysis of misconduct allegations. It is positioned to make an unbiased evaluation of the allegations prior to the assignment or deployment of limited investigative resources. It increases the operational efficiency of IA by filtering out complaints that do not require the expertise of a trained investigator or that are of a nature which should be addressed by agency leadership.

Although this is considered a best practice, it may not be necessary for some smaller Customs agencies to create a filtering process if the number of allegations is generally low and manageable by the IA staff.

It is a best practice to ensure that the Intake unit is composed of a combination of experienced IA and HR professionals. These individuals should be selected for their investigative experience, HR experience, and understanding of Customs rules, regulations, and Codes of Conduct to which agency employees are held accountable.

Tiered System of Allegations

To develop a functioning and effective IA unit, a process by which allegations are submitted, processed, and tiered should be established. Generally, an IA investigation is opened when an individual is alleged to have engaged in potential misconduct. This section details a series of best practices that the Intake unit may take to ensure that all allegations are properly and efficiently received, evaluated, tracked, and addressed.

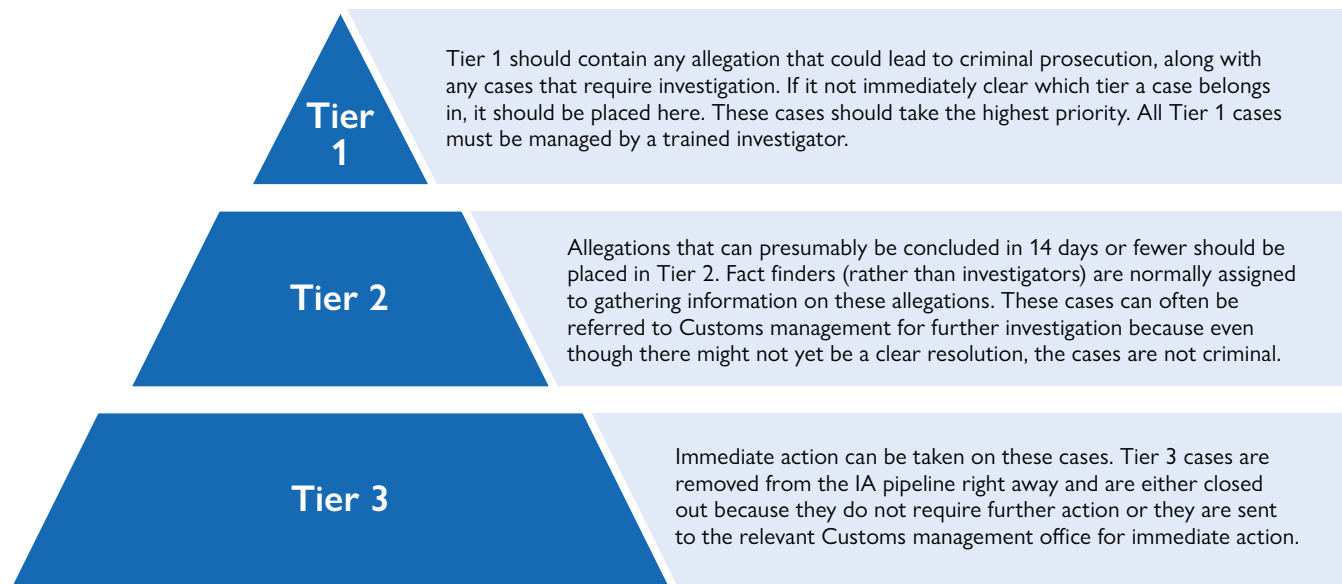
First, there must be at least one established method for employees and members of the public to report allegations of Customs employee corruption and misconduct to IA. This may include establishing and publicizing a dedicated IA email address or phone number for allegation receipt and processing. Customs employees and members of the public should be allowed to anonymously submit allegations.

Working collaboratively, IA and HR must ensure that there are sufficient staff resources available to monitor the Intake unit email address or phone line to promptly respond to allegations of wrongdoing. Although there may be a preferred method for allegation receipt and processing, the Intake unit must accept all allegations reported by agency employees and the public, whether the information is submitted verbally, in person, by email, through regular mail, or in some other manner.

As part of the agency's effort to ensure that employees understand and trust the reporting process, it is important that all employees understand their roles and responsibilities with respect to reporting misconduct allegations and that they recognize the agency's demonstrable actions in efficiently addressing the allegations it receives.

Upon receipt by the Intake unit, all allegations should be triaged into a series of tiers based on allegation type. These tiers are intended to assist in evaluating the severity of the allegation and to prioritize the workload for IA. The tier system also ensures that allegations are processed in a manner that makes the most effective and efficient use of agency resources.

Once a case is classified into a specific tier, it can be reclassified upon the receipt of additional information or evidence which requires that it be handled differently.



MANAGEMENT INSPECTIONS DIVISION

The Management Inspections Division is a specialized unit within IA. MID is responsible for assessing the operation of the agency and its components. It is also responsible for assessing policies to determine whether existing policies are sufficient, whether additional policies should be created, and whether the policy is being compiled with all of the other required policies. If, during the course of an inspection, MID discovers administrative misconduct or criminal activity, it refers the information to the Intake unit for processing and assignment as an investigative matter.

It should be noted that the primary focus of MID is to evaluate compliance with internal agency policy and procedure to enhance organizational efficiency and effectiveness, identify and mitigate risks, and implement proactive and preventative measures that foster workforce integrity.

Best Practice

The use of subject matter experts to conduct these inspections is paramount to the success and effectiveness of the program. A best practice is to have core personnel assigned to MID to administer the program and to ensure proper oversight of the inspections. Using subject matter experts collaterally or on a temporary assignment to conduct the actual inspections should also be considered.

INVESTIGATIONS UNIT

The Investigations unit is responsible for conducting investigations of criminal and serious administrative misconduct on the part of agency employees. In general, the allegations for which the Investigations units are responsible are misconduct

allegations that, if substantiated, would result in prosecution, adverse disciplinary action up to and including removal from employment, or would undermine the agency and its mission and reputation.

INTELLIGENCE UNIT

The Intelligence unit is responsible for exploiting information derived from a variety of sources to support investigative activities and to mitigate threats to the agency, its employees, and its mission. The work performed by personnel assigned to the Intelligence unit is both responsive and proactive and may help to identify potential misconduct in which agency employees may be involved, in addition to insider threats. The Intelligence unit, working collaboratively with information security specialists, may monitor or review the use of agency systems and agency-held data to identify anomalies that may be indicative of potential misuse, abuse, loss, unauthorized access, or compromise.

PERSONNEL SECURITY UNIT

The Personnel Security unit is responsible for the initial screening and vetting of applicants, as well as the continuous evaluation of agency employees (as discussed in the [Desired Additional Employee Vetting Practices](#) section of this guide). The Personnel Security unit may receive self-disclosed information provided by agency employees, conduct background checks to identify information antithetical to employment by the agency, and oversee random employee drug testing (where authorized). It may also conduct ongoing reviews of employee-related financial information in accordance with applicable statutes, policies, and procedures to identify instances in which employees may possess unexplained wealth inconsistent with employment by the agency or in which employees appear to be living a lifestyle inconsistent with their financial means.

In the event that any of the recommendations are limited or otherwise prohibited by statute, the Personnel Security unit would not engage in those activities.

IA Human Resources Structure

Human Resources play an important role for the Internal Affairs units within Customs agencies, distinct from the role that it plays for other Customs units. Due to the sensitive and important nature of an IA unit, the recruiting, vetting, staffing, and retention processes need to be approached with a specific focus on cultivating an ethical and committed workforce with high job satisfaction. It is essential that the HR department works closely with IA staff to collaborate on hiring, training, and retention to ensure that every effort is being made to take these actions with an awareness of the unique and specific mission and needs of IA.

Within a Customs organization, HR is generally responsible for the whole of the Customs agency and not dedicated specifically to IA. Therefore, when discussing the broader goals of HR, this guide uses the World Customs Organization's explanation of the role of HR. It is helpful to understand this when considering why it is important that the staffing and retention of IA fall under the authority of HR. Broader HR goals, as defined by WCO, include:

- Aligning the administration's workforce with the government's priorities and aligning the organization's mission, strategic plan, and budgetary resources.
- Supporting HR strategies (organization design and classification, training, and career development) that are tailored to the current and future needs of the administration.
- Assisting managers in meeting their responsibilities and accountabilities and in realigning their workforce.
- Developing and sustaining strong leadership across the administration.
- Facilitating performance improvement and reporting through the development of performance measures.

Specifically, HR is responsible for determining and managing the following for an IA unit:



More detail on how HR can best operate within a Customs organization can be found on the following websites:

- [Course: WCO Framework of Principles and Practices on Customs Professionalism](#)
- [WCO Guide to Implementing Competency-Based Human Resource Management in a Customs Administration Environment](#)

Internal Affairs Hiring

Context

The perceptions of Internal Affairs units can create a fundamental challenge when hiring new employees. Since IA exists primarily in enforcement and regulatory capacity, it is often seen as an undesirable unit to join for individuals who are currently a part of a Customs administration. Depending on how pervasive this perception is throughout the agency, it can create an environment in which HR must seek external hires to fully staff a unit.

Each country's IA unit's staffing needs are unique based on a combination of factors, including resource availability, country size, and Customs leadership's commitment to creating a fully functional IA unit.

It is essential for an IA unit to be fully funded to attract and employ highly qualified staff members within each of its divisions. This guide recognizes that it may not be possible in all situations to have discrete staff for each division or to recruit staff members who possess all the professional skills identified in this section. However, every effort should be made to ensure that the critical roles in an IA unit are funded at a level that ensures the successful performance of mission-critical responsibilities.

These efforts should focus on establishing an IA-specific pay structure that ensures recruitment and retention of qualified personnel, in addition to providing funding:

That supports attendance at basic, advanced, and specialized training on a regular and recurring basis.

For the acquisition of equipment and technology that supports investigations, intelligence, and inspections operations.

That supports travel in support of investigations, intelligence, and inspections operations.

For travel to support leadership engagement with field-based resources to demonstrate agency commitment to IA operations.

That supports the development of confidential sources of information and undercover operations (where authorized by law) for the purpose of developing and acquiring information and evidence.

For witness travel and witness security.

For the relocation of personnel.

To support career advancement, promotions, bonuses, nonmonetary awards, and salary increases to enhance workforce satisfaction and recognition for sustained outstanding professional efforts.

Hiring within an IA unit also differs from hiring in any other Customs unit because IA employees are, by nature of their positions, held to a higher ethical and technical standard than their peers. Given that employees are responsible for enforcing a Customs administration's code of conduct, they must demonstrate that they are capable of holding to the organizational standards at the highest level.¹

Hiring Process

Human Resources generally sits outside of the Internal Affairs unit within Customs agencies. Given that the HR staff likely possess varying levels of knowledge about the role and needs of IA, HR must work closely with both Customs leadership and IA leadership to determine the optimal hiring process.

Customs leadership should be actively engaged in HR tasks to ensure that the unit is being staffed with qualified individuals who meet agency-established standards. The particular skills and knowledge needed to navigate the mission of the Customs agency is specific and is better understood by those individuals responsible for the agency. Additionally, Customs leadership should make it clear that IA operations are a priority and are to be taken seriously by the current administration. Tools for signaling this to the broader Customs workforce include financial support for IA, prompt responsiveness to any findings of misconduct within the agency, and enforcement of policies that encourage compliance with IA investigations, staffing, and operations.

New Employee Sourcing

When approaching the hiring process for new employees, one key factor to consider is the sourcing pool. HR has the option of hiring externally (individuals outside of the Customs organization), internally (individuals currently employed by the Customs administration), or a combination of both.

Experts with extensive experience in Customs and IA recommend that the first preference should be to identify and select qualified personnel from within the agency who have demonstrated the highest standards concerning ethics and integrity and who possess the professional capabilities and emotional intelligence to perform as investigators tasked with conducting inquiries into the most challenging investigative assignments. These individuals likely interact with former colleagues and must possess the ability to behave in a professional manner, given the nature of the potential allegations. IA employees require a complex depth of knowledge, which is further discussed in the [Qualifications for Investigative and Non-Investigative Staff](#) section of this guide. This knowledge base is best formed through hands-on experience working in the positions that the IA unit is responsible for monitoring.

However, it is understood that there are situations in which it is not possible to hire exclusively from within the Customs agency. When there is a shortage of viable internal candidates, bringing in outside hires is acceptable. In that case, it is essential to ensure that any potential hires meet the skills criteria and have at least two years of relevant experience in investigations, law enforcement, the legal community, or other professional fields that require the use of professionalism and tact when dealing with individuals across all levels of a government agency. Given the specialized nature of an IA unit, additional efforts should be made to ensure that potential employees meet all of the skills listed in the [Qualifications for Investigative and Non-Investigative Staff](#) section of this guide.

Candidates must possess an interest in and the ability to conduct effective interviews utilizing a variety of techniques; the ability to communicate in writing and to document investigative findings; the ability and willingness to think “outside

¹ De Wulf, L., 2005. *Human resources and organizational issues in customs. Customs modernization handbook*, pp. 31–50.

the box” and to pursue alternative methods for identifying and collecting relevant evidence; the ability to set aside personal biases when tasked with conducting internal investigations, focusing on and reporting the facts while maintaining transparency; and the ability to understand legal requirements for producing sound products for investigations on which third parties may rely to pursue prosecution or disciplinary action or to clear individuals wrongfully accused or cleared of alleged wrongdoing.

Additionally, given the enforcement and monitoring role of internal affairs, in some situations, IA may carry a negative connotation that makes it difficult to incentivize current Customs employees to be interested in joining the IA unit. There are several options to address this systemic, cultural barrier which are discussed in the [Internal Affairs Employee Retention](#) section of this guide.

If HR determines that a broader pool of candidates is necessary, employees should be positioned within the unit so that they work with internal and external hires. The knowledge of unwritten nuances and norms within a particular Customs agency should be spread out so that all employees interact with experienced Customs employees.

RECOMMENDATIONS

INTERNAL HIRING

It is considered a best practice to hire primarily from within the existing pool of Customs employees. This hiring practice allows for employees to have an immediate deep understanding of the organizational mission and structure to effectively enforce the standards and regulations of a Customs administration. Experts believe that it is optimal for all new IA employees to have at least two years of experience within the Customs administration in any capacity before starting a role in IA. This provides an opportunity for potential IA employees to develop an understanding of the Customs agency's mission and operations. Any external hires should bring technical experience.

When there is a shortage of Customs employees who are interested in reassignment to staff the IA division, a job rotation system could be a viable option. Under this system, employees from other divisions would be temporarily assigned to IA. This system provides employees with the opportunity for career and skill development while enabling HR to tap into a broad pool of qualified individuals with Customs experience to staff the IA division. Additional details on the implementation of a job rotation system are in the [Internal Affairs Employee Retention](#) section of this guide.

QUALIFICATIONS FOR INVESTIGATIVE STAFF

SOFT QUALIFICATIONS

Essential Soft Qualifications

- **Impartiality.** All potential hires must clearly demonstrate an ability to set aside personal biases when tasked with conducting internal investigations. This position often requires employees to conduct investigations and to focus on the facts.
- **Critical thinking skills.** All potential hires should demonstrate strong critical thinking skills. Specifically, all candidates must be able to quickly analyze a situation, synthesize the available data, and develop a logical and appropriate response or solution.

Desired Soft Qualifications

- **Commitment to the Customs mission.** All IA employees must understand and commit to the Customs mission. They are tasked with upholding the integrity of the organization and must demonstrate a commitment to fostering

safe and secure trade and border security. This commitment can be built over time, but it is preferable if employees enter IA committed and are knowledgeable about the Customs mission.

- **Out-of-the-box thinking.** All potential hires must have the ability to innovatively pursue alternative methods for identifying and collecting relevant evidence within the bounds of the IA authority.
- **Conflict management.** When serving in an investigative capacity, employees should demonstrate an ability to diffuse tense situations and to practice conflict management, should a conflict arise.

TECHNICAL QUALIFICATIONS

Essential Technical Qualifications

- **Writing skills.** All potential hires must possess the ability to communicate the investigative process in writing and to clearly document investigative findings. The process taken in an investigation must be thoroughly documented to maintain the integrity of the IA office.
- **Interviewing experience.** All potential hires must possess the ability to effectively conduct interviews utilizing a variety of techniques. Previous experience conducting investigations is desired, or the candidate must have prior knowledge and understanding of the investigative process.

Desired Technical Qualifications

- **Legal understanding.** Candidates should have an established ability to understand legal requirements for producing sound products of investigations on which third parties may rely to pursue prosecution, disciplinary action, or to clear individuals wrongfully accused or cleared of alleged wrongdoing. This legal basis can be taught if candidates do not have prior ability; however, if they are hired, focused training will be necessary to help them develop a knowledge base.

QUALIFICATIONS FOR NON-INVESTIGATIVE STAFF

Disclaimer: Non-investigators fill a variety of functions within an IA unit. In some situations, if a Customs agency has a small IA unit, the investigative staff may also be responsible for data analysis and other non-investigative functions. Therefore, all of the following skills for non-investigators are categorized as “desired qualifications.” However, the goal should be to build an IA workforce in which all of these skills are represented in at least one individual within the IA unit.

SOFT QUALIFICATIONS

Essential Soft Qualifications

- **Critical thinking skills.** All potential hires should demonstrate strong critical thinking skills. Specifically, all candidates must be able to quickly analyze a situation, synthesize the available data, and develop a logical and appropriate response or solution.
- **Impartiality.** All candidates must clearly demonstrate an ability to set aside personal biases when tasked with conducting internal investigations. This position often requires employees to conduct investigations and to focus on the facts.
- **Out-of-the-box thinking.** All potential hires must have the ability to innovatively pursue alternative methods for identifying and collecting relevant evidence within the bounds of the IA authority.

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- **Commitment to the Customs mission.** All IA employees must understand and commit to the Customs mission. They are tasked with upholding the integrity of the organization and must demonstrate a commitment to fostering

safe and secure trade and border security. This commitment can be built over time, but it is preferable if employees enter IA committed to and knowledgeable about the Customs mission.

TECHNICAL QUALIFICATIONS

Desired Technical Qualifications

- **Digital forensics skills.** Given the prevalence of modern technology, it is incredibly important that individuals in IA have digital forensics skills. Specifically, potential hires should have experience retrieving and cataloging digital data from hardware and software. Experience collecting metadata, email data, email information, and deleted or backed-up files is also particularly relevant to this role.
- **Financial investigation skills.** This skill is also known as financial accounting. Candidates who possess this skill typically have experience analyzing the flow and use of money in investigations relating to theft, embezzlement, money laundering, and tax evasion.
- **Open source and social media analysis.** Given the prevalence of social media and freely published information, it is essential that the information gathered in investigations includes social media and open-source data. Successful candidates should have experience finding, gathering, and analyzing data from social media platforms, news sources, press releases, and Internet searches.
- **Data analysis.** Candidates who possess this skill should have the ability to analyze large quantities of quantitative and qualitative data. Candidates should have experience successfully utilizing Microsoft Excel, SQL, Stata, R, or other relevant data analysis software.

Employee Screening

The vetting of prospective new employees for Internal Affairs within a Customs organization should be comprehensive and intensive. IA employees set the standards for an ethical and productive workforce. Therefore, a thorough vetting process is essential to ensure that there are no significant risks in the prospective employee's background. This process should include traditional background checks, financial background checks, self-disclosures of potentially relevant information, and a drug test, if the practice is compliant with national laws.

BACKGROUND CHECKS

Essential Information to Obtain During Background Checks

- **Education.** Background checks should verify the candidate's reported education, including confirmation of graduation, field of study, and class rank (if reported).
- **Employment.** Background checks should verify the candidate's reported employment for the past ten years.

Desired Information to Obtain During Background Checks

- **Prior analytical or investigative experience.** In the case of investigative staff, it is recommended that the employment background check confirms that the candidate has investigative or analytical experience with previous employers.

FINANCIAL BACKGROUND CHECK

All employees should go through a financial screening process. Financial vetting is an essential way to maintain the security and integrity of an IA unit. Excessive debt or financial challenges create a gap in the security of an IA division because individuals with these issues may be vulnerable to corruption through financial incentives.

Necessary Financial Background Checks

- A preemployment credit check should be conducted on all new employees to establish a baseline for financial solvency. This can flag any potential areas of concern with assets or excessive debt. Issues that require further investigation include assets that far exceed the potential employee's means and salary. There may be legitimate reasons for asset excess, such as inheritance or a spouse's salary. However, any inconsistencies between salary and assets should be investigated before the start of employment.
- All IA employees should have their credit checked regularly. The industry standard is for a credit check to be conducted every five years to identify any major changes in financial solvency.

Optional Financial Background Checks

- Financial background checks should be a continuous process, especially for investigative staff. If resources allow, it is strongly recommended that any individual with involvement in investigative processes have their financial status monitored annually to check for excessive debt or concerning transactions. This is most easily conducted through an annual credit check.

SELF-DISCLOSURES

Human Resources divisions should ask employees to self-disclose information in the following categories during the hiring process.



Necessary Self-Disclosures

- **Familial ties.** All new and existing employees should be asked to disclose any family members who hold positions within the Customs agency. If there were no familial relations holding positions within Customs at the time of hiring and this changes during employment, this should be disclosed at the earliest opportunity. This disclosure is essential for ensuring that there are no conflicts of interest. It is critical that spouses do not have direct oversight over a spouse and that a family member never investigates another family member. Additionally, cohabitation with another Customs employee should be disclosed.

- **Criminal encounters.** All new employees should be asked to disclose if they have ever been convicted of a crime. Furthermore, all current employees should disclose any criminal encounters, including the following:
 - Arrest
 - Conviction
 - Conviction of a close family member
- **Personal and professional contacts.** All employees should disclose existing personal and professional contacts who meet at least **ONE** of the following criteria:
 - A personal relationship with any convicted criminals or known members of extremist organizations
 - Membership with any foreign associations, political parties, or lobbying groups
 - Participation in any extremist or terrorist organizations
- **Outside employment.** Outside employment (paid or unpaid) should be reported, especially if the work has some ancillary relation to or is regulated by Customs.
 - For example: If an employee also works as a Customs broker, this should be disclosed because it poses a conflict of interest.
- **Foreign travel.** Before a new hire begins their employment, HR should request disclosure of all foreign travel within the last five years. This is particularly relevant in conjunction with the self-disclosure of association with any foreign associations, especially those that may have ties to cartels, criminal gangs, or terrorists. Employees should not be asked to list work-related foreign travel.

Optional or Conditional Self-Disclosures

- **Drug use.** HR should ask new employees to disclose prior substance use only if ALL of the following criteria are met:
 - The substance in question is illegal.
 - Nonuse of the substance is a condition of employment.
 - The use of the illegal substance in question occurred within the established time frame. (Some agencies may state that, to be employed, no illegal substance use should have ever occurred; whereas others do not request disclosure if the substance abuse occurred outside of a given window of time, such as five years.)
- **Mental health.** HR should ask employees to disclose any mental health challenges, including in-patient stays at a mental health treatment center or diagnosis of mental health conditions that could impact an individual's ability to effectively perform the stated duties of their position.

Mental health is often a challenging subject to address due to a lack of comprehensive mental health care, and persistent stigmas exist around seeking support for mental health care in most countries.

It is particularly important to have transparency surrounding mental health with IA employees. Due to the high-pressure nature of the IA role, employees may often find themselves investigating their peers and recommending criminal and administrative consequences for fellow Customs employees. The individuals within the unit must be mentally sound and must have the mental capacity to handle the challenges of their position.

- Disclosure: If HR requests this information, disclosure of mental health challenges must not place the employee's job or security clearance in jeopardy. Therefore, there must be preexisting systems built into a Customs agency to support individuals with their mental health.
- Mental health **IS NOT** a condition of employment, and therefore individuals cannot be fired for disclosing this information.

The practice of self-disclosure should occur after the start of an employee's tenure within IA, to avoid actual or perceived conflicts of interest and to ensure the overall integrity of the organization, setting a standard to which the whole of the organization may be held.

DESIRED ADDITIONAL EMPLOYEE VETTING PRACTICES

Drug tests²

- If, as detailed above, nonuse of illegal substances is a condition of employment, all new employees should be drug tested at the start of employment and based on need thereafter. Drug testing should be focused on large cities or areas with a high prevalence of illegal substance use.
- This initial drug test is effective in evaluating current conduct. However, it does not predict future conduct concerning drug use. Therefore, to maintain the integrity of the agency, it is recommended that IA intentionally focus on continuous evaluation of the entire workforce, including IA employees. Drug tests should be randomized and should test roughly 10 percent of the workforce every six months or according to resource variability. The test can also be issued upon suspicion of drug abuse by a supervisor.

BEST PRACTICES

The recommendations in this section are primarily focused on the vetting process of new employees. However, if resources allow, all the above vetting should be conducted on current employees every five years or at the time of a promotion. This helps to ensure that no changes in the workforce could compromise the security of the Customs agency.

² *Disclaimer: Some national privacy laws may prohibit drug testing. If this is the case, the recommendation should not be implemented.*

Internal Affairs Employee Retention

Context and Retention Challenges

High turnover rates, burnout, and low employee satisfaction are all persistent issues within Internal Affairs units around the world. There are several reasons for these challenges. This section addresses each of them, along with some potential solutions.

CAREER OPPORTUNITIES

A common challenge in recruiting and retaining IA staff is the lack of career growth opportunities. Employees have reported feeling that when they transition into IA, their career will remain there, with limited opportunity for advancement, promotion, or career growth. In many small IA offices, this may be an accurate perception since small staff size may prevent the possibility for lateral or upward movement.

JOB ROTATIONS

Human Resources can play a critical role in creating a job rotation program within IA to mitigate the impression that entering IA means stalled career growth. Under a job rotation program, employees would rotate into IA for two- to five-year intervals from other divisions within Customs.

Employees who demonstrate the interpersonal and technical skills necessary to be successful in IA would be offered the opportunity to rotate into IA for a fixed period. When they complete their rotation, they have the opportunity to transition back into another division within Customs, bringing valuable investigative skills with them.

A job rotation program provides many benefits for the IA unit and for employees. By structuring employment as a fixed term, HR augments the potential pool of candidates to draw from. This enables HR to increase the percentage of internal hires who have previous experience with Customs—and therefore a greater understanding of the standards they are meant to be ensuring.

DEVELOPMENTAL OPPORTUNITIES

Given that a lack of opportunity for professional growth is seen as a significant deterrent to joining the IA program, there are likely to be high turnover rates within many Customs organizations.

The job rotation program, and the focus on creating pathways for career growth within the broader Customs agency, are only successful if, through the term of employment with IA, employees develop valuable, transferable skill sets. HR should work with IA to develop a variety of supplemental employee development programs.

Developmental opportunities should be segmented into management or leadership development and technical skills development. Leadership development opportunities could include short workshops on management styles, strategies, and employment. They could also include multiweek or multimonth leadership institutes in which selected individuals are allowed to work closely with rising leaders in various divisions and to hone their leadership skills.

Technical skill opportunities should support IA employees in developing transferable skill sets that can be valuable in advancing their personal career goals. Examples of this include data analysis workshops, courses on forensic accounting, and training on the use of new ports and borders technology and software.

HR should provide IA employees with the time and resources to take advantage of these opportunities. Additionally, HR should provide all employees who participate in developmental opportunities with documentation of participation so that they can demonstrate growth when looking to move to other divisions within Customs at the end of their tenure at IA.

Benefits for the employees who participate in developmental opportunities extend beyond skill development. Since these opportunities are also often available to individuals outside of IA, they provide a valuable chance to network with the broader Customs community of employees, which in turn supports employees in their career advancement goals, should they choose to leave IA and reenter the broader workforce. Networking also serves as a tool for strengthening the relationships between IA and other divisions within Customs. Specifics of these interactions are detailed later in this guide.

Additionally, given that IA units may be small and may have limited promotion opportunities, skills development provides an opportunity for employees to take on additional responsibilities in new areas. Not only does this support employees in feeling vested in the success of IA but also it drives growth and increased efficiencies for the unit itself.

COMPENSATION

Uncompetitive compensation is also a major factor that lends itself to high turnover and low employee satisfaction rates. Though IA employees may earn a similar salary as that of a general Customs employee, several factors justify compensating IA personnel at a higher rate than their peers. This compensation increase may be temporary for those employees performing interim, rotational assignments in an IA unit and should be based on the complexity and sensitivity of the work being performed, as well as its overall importance to the agency.

A competitive compensation package, including benefits, can be a powerful tool in promoting worker satisfaction, as well as in preventing corruption. Given the previously discussed challenges with the perception of IA and the emotional stress of working in an environment in which the primary goal is to prevent and identify wrongdoing by their peers, a higher-than-average compensation should be considered.

Ideally, preemployment vetting processes for IA assist in certifying IA candidates who have never engaged in potentially inappropriate or unlawful activities, such as supplementing their income outside authorized means. However, providing higher compensation packages disincentivizes potential corruption and mitigates potential resentment from IA employees who may consider their overall compensation package to be incongruent with the broader Customs workforce.

Furthermore, when struggling with a labor shortage, one of the simplest solutions is to increase the offered salary to tap into a larger candidate pool. Though it may not be possible for all HR divisions to allocate increased resources for IA salaries, it is strongly recommended that all Customs agencies make a conscientious decision to financially support the IA unit. Competitive salaries serve to compensate for work that is often intensive, adversarial, and emotionally draining for IA employees. If resource shortages prevent higher salaries, HR should consider improving the overall benefits package to bridge the gap between resource capacity and the desired total compensation packages.

Employee Welfare and Satisfaction

Unfortunately, in many situations, the retention challenges within IA stem from a systemic culture that is much slower to change, even with diligent work from IA and HR to create a healthy and productive working environment. Investigators and staff in an IA unit often operate under elevated levels of emotional and professional stress, given the high stakes and the often adversarial nature of the work. These employees must investigate allegations and build cases that their coworkers, friends, and acquaintances may be either involved in or have strong opinions about.

Therefore, HR must work diligently to create an environment in which employees are emotionally, physically, and mentally supported by their management. Each Customs agency likely has specific needs based on the individual challenges that its IA divisions face. However, the following can be implemented in most organizations with minimal effort:

- **Mental health care.** HR should provide access to mental health care as a part of its standard benefits plan. If this care includes access to a centralized therapist or mental health professional, it should be communicated and enforced that the terms of employment cannot be terminated by anything that is disclosed unless there is a risk of harm or violence.

Education and Training

Codes of Conduct

For Internal Affairs to be efficient and effective, it needs to have a clear directive for what behavior and actions are unacceptable and should be investigated. Human Resources should provide a detailed Code of Conduct to all Customs agency employees. This Code of Conduct should include the following:

- Ethical code for employees
- Professional expectations of employees
- Clearly stated consequences for violating each statute of the Code of Conduct

All new employees should be given a copy of the Code of Conduct at the start of their employment. They should read it in full before signing a document to confirm that they have read and acknowledged the information included in the Code. Annual training for all employees is essential to inform them of and reinforce these requirements.

Any updates to the Code of Conduct or agency policy should be promptly sent to all employees throughout the organization. HR must require a signature of acknowledgment after every update, to avoid any potential liability in which an employee claims they were unaware of the expectations placed upon them.

The Code of Conduct is used as a guide by the Intake unit. Therefore, it should detail which offenses are criminal, which could lead to termination, which require administrative action, and which do not require a consequence.

Internal Affairs Training

Initial Training

HR in all Customs agencies should be responsible for the training of new staff and employees, including new IA employees. Each new IA employee should receive both general and job-specific training. General training should cover the Customs mission, the role and expectations of IA, the Code of Conduct, and the ethical responsibilities of IA employees.

Job-specific training should be tailored to each component of IA: the Intake unit, the Management Inspections Division, the Investigations unit, and the Intelligence unit. Ideally, the Investigative unit has preexisting investigative experience. However, if they do not, HR ought to direct attention to ensuring that new, inexperienced investigators conceptually learn the duties of their role and have the opportunity to shadow currently active investigations prior to independently conducting them. All job training should focus specifically on what the expectations are of the new role, along with the laws and policies that affect their position. The essential nature of IA should be highlighted for all new hires.

The type of training may vary depending on available resources, including HR personnel and technology.

Recurring Training

Annual training should be conducted for all IA staff, during which they must review the Code of Conduct, relevant laws and policies, and position responsibilities. Additionally, annual training should address any new technology that may have created new vulnerabilities in the Customs scheme, as well as new technologies or strategies for identifying and addressing misconduct.

Best practice: Have a digital, asynchronous course for the annual training, to reduce the necessary labor hours. If this is not feasible, a live course is acceptable if it does not deter the effective delivery of IA services.

To incentivize participation, there should be detailed consequences if the course is not completed, particularly if it is conducted asynchronously.

Leadership Training

The work in which an IA unit engages is arduous and may have negative effects on the morale of the workforce at all levels within the organization. Accordingly, all personnel assigned to IA should receive a variety of training and support to ensure their continued operational effectiveness.

Managers with responsibility for leading individuals engaged in investigative, intelligence, and inspections operations should receive basic, advanced, and specialized leadership training focused on engaging with team members to motivate personnel, recognize contributions to the mission, and promote overall organizational effectiveness. The training programs should focus on soft skills, including, but not limited to, active listening, conflict management, fostering teamwork, leading through change, stress management, and emotional intelligence.

Failure to provide this and other leadership-related training negatively affects the IA unit and its personnel tasked with leading staff members who daily, and by the very nature of the work, are engaged in sensitive and potentially controversial activities involving individuals assigned to positions of authority within the Customs agency.

Customs Training

HR, in close collaboration with IA, should also be responsible for the training of the broader Customs workforce. HR and IA should work together to develop training for all employees, detailing the ethical, legal, and professional rules and regulations for employees. By educating Customs employees about what is expected of them and focusing on the importance of responsibly representing Customs, HR and IA can work to mitigate potential misconduct prior to its occurrence.

Initial Training

Each new Customs employee should receive initial training from IA and HR, upon being hired—separate from job-specific training. This training should cover the Code of Conduct, professional and ethical responsibilities for a Customs employee, laws and regulations that must be adhered to, and a comprehensive overview of the mission and goals of Customs.

Recurring Training

Annual training should be conducted for all Customs staff during which they must review the Code of Conduct, relevant laws and policies, and position responsibilities. Additionally, annual training should reflect any updates to Customs policy and any laws that have been implemented since the last annual training period.

Best practice: Have a digital, asynchronous course for the annual training, to reduce the necessary labor hours. If this is not feasible, a live course acceptable if it does not deter the effective delivery of IA services.

To incentivize participation, there should be detailed consequences if the course is not completed, particularly if it is conducted asynchronously.

Collaborations with Other Units within Customs

Internal Affairs exists in a regulatory and investigative capacity which can, at times, seem to place it in opposition to other segments of a Customs agency. Particularly when there are frequent instances of corruption, there may be a degree of animosity toward an IA unit. However, despite the impression that IA is a solitary and adversarial body, it functions best when working in close conjunction with other components of the Customs agency.

Functionally, IA should build a working relationship with all other divisions within Customs. Creating trust and familiarity increases the likelihood that misconduct is discouraged and prevented within a division.

IA should also work to build relationships with other components within Customs. These relationships may in some situations be facilitated by Human Resources through employee selection and in written guidance and standards for IA units.

The most essential collaboration for IA is with the management of other agency divisions and units. These divisions are responsible for handling all Tier 2 and 3 allegations that do not require a full investigation, and it is important that IA feels that they can turn over allegations to various management components and trust that they are handled appropriately and thoroughly. Additionally, in the case of a sensitive investigation, there may be some cases in which, to mitigate security risk or the possibility of destruction of evidence, an individual needs to be reassigned without attracting media or union attention. A strong working relationship with Customs management means that IA is able to request support from management and to trust that the situation will be handled with discretion and appropriate focus.

Additionally, IA should coordinate with the information technology (IT) divisions within Customs. Globally, IA units have become increasingly data driven. Therefore, IA should, in conjunction with IT divisions, develop clear methods for auditing existing systems and vetting new systems for the capacity to be audited.

IA should also maintain a particular focus on any division that works directly or tangentially with finances and funds. Many serious allegations involve financial corruption, bribery, or fraud. Therefore, collaborating with procurement, funding, and financial monitoring offices enables IA to more efficiently and thoroughly conduct investigations.

Due to the need for extensive collaboration with other governmental agencies (OGAs), the head of IA must be able to maintain professional and trusted relationships. HR should closely evaluate a potential IA head's ability to work collaboratively and build relationships even in situations where there may be tensions from previous or active investigations.

Best practice: Establish a fact-finder program outside of IA composed of individuals from various agencies. The purpose of this program is to have an inspecting framework for any Tier 2 allegations that do not require a full investigation but require an additional inquiry to determine management's next steps.

Collaborations with Outside Entities

Internal Affairs, particularly its leadership, should develop and maintain a close working relationship with other offices within Customs. Although IA reports directly to the top level of Customs management and therefore does not have peers within the Customs agency in the truest sense of the word, a positive working relationship based on trust is still essential. IA leadership should work to maintain necessary transparency at state and federal levels, when necessary.

Additionally, IA must be prepared to coordinate with OGAs outside of Customs because most cases cross jurisdictions. Therefore, building strong working relationships between IA and other law enforcement agencies, various other enforcement agencies, and investigative bodies is essential to foster collaboration and share information.

The working relationship with OGAs could also become necessary in the instance that an IA employee is the subject of an investigation. IA should never investigate its own employees.

Conclusion

Internal Affairs units are a fundamental component of Customs organizations. Unfortunately, due to challenges surrounding funding, the perception of IA units, and the structural norms, these units often go underprioritized and underfunded.

The role that Human Resources plays in the creation, operation, and growth of an IA division is extensive and, with the appropriate tools, can counteract some of the aforementioned challenges. From the structuring of Customs IA to the hiring of new personnel, employee retention, and workforce success, HR should be intrinsically involved in the operations of Customs IA units.

Throughout this guide, there are a multitude of best practices, tools, and recommendations for HR and IA to utilize in their efforts to create and improve IA units.

Each Customs administration has unique challenges, operational realities, and cultural and societal norms which impact the feasibility of implementing every recommendation outlined in this guide. The key takeaway ought to be that IA units should be prioritized and operationalized to the fullest extent possible. Even implementing 20 percent of the recommendations outlined in this document would be preferable to implementing none.

ANNEX 1:

Key Literature Resources

The literature review included a comprehensive exploration of the current IA Customs environment and standards globally and a thorough and cohesive set of recommendations for programmatic improvements.

1. [WCO Guide to Implementing Competency-Based Human Resource Management in a Customs Administration Environment.](#)
2. [Presentations and videos from the WCO Regional HR conference.](#)
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ANNEX 2:

Experts

In the creation of this guide, the authors consulted a multitude of Customs experts, including key personnel within U.S. Customs and Border Protection (CBP) and retired officials from Border Forces globally. The experiences, perspectives, and opinions of the following experts were utilized in the creation of this guide.

WILLIAM FERRARA

Mr. William Ferrara is a highly accomplished federal law enforcement executive with extensive leadership, management, and operational experience. Throughout his 33-year career at U.S. Customs and Border Protection and its legacy agency, the United States Customs Service, Mr. Ferrara was a transformational leader who consistently delivered solutions to complex national and international challenges.

Most recently he served as the Executive Assistant Commissioner for the Office of Field Operations, the largest office within CBP. In this role, Mr. Ferrara was responsible for more than 33,000 employees, including over 28,000 CBP Officers and Agriculture Specialists.

Before serving as the Executive Assistant Commissioner for the Office of Field Operations, Mr. Ferrara served as the Executive Assistant Commissioner for Operations Support, where he provided leadership and direction across six subcomponents with a broad spectrum of capabilities to support CBP operations and to enable mission execution. These subcomponents included the Office of Intelligence, Information and Incident Coordination Center, Laboratories and Scientific Services, Law Enforcement Safety and Compliance, Office of International Affairs, and the Planning, Analysis, and Requirements Evaluation Directorate. Previously, Mr. Ferrara also served as the Director of Field Operations for both the Boston Field Office and the Chicago Field Office.

Prior to being appointed in 2014 to the Senior Executive Service, Mr. Ferrara served in many roles, both in the field and at the headquarters level. From the beginning of his career, Mr. Ferrara was an effective change agent in altering CBP workplace culture to be more inclusive, forward-leaning, and mission-focused. He created revolutionary programs, such as the Office of Chief Medical Officer, the Office of Field Operations Mentor Program, and the Office of Employee Engagement & Organizational Culture.

PAUL HAMRICK

Mr. Paul Hamrick is a highly accomplished Human Resources executive specializing in law enforcement. Throughout his distinguished career, he has transformed government agencies and private organizations through his work in personnel management and internal threat reduction. Mr. Hamrick is a results-driven professional and a thought leader in the space of investigations and personnel program management.

Most recently, as the Director of Law Enforcement Programs at AIC Partners, Mr. Hamrick provided expertise in investigations and intelligence analysis providing tactical and strategic support to the U.S. and international law enforcement

and intelligence communities. In this capacity, he developed policy, procedure, and operational guidance governing the collection, analysis, and dissemination of open-source data, evaluated specialized, technology-enabled solutions, and designed workflows that increase effectiveness for various local and international law enforcement entities.

Previously, Mr. Hamrick served as a Senior Program Manager at General Dynamics Information Technology. In this role, he managed the company's personnel Vetting and Security business unit and delivered federal background investigations in support of personnel security operations. He handled HR contentions across the company and delivered high-quality investigative results to support suitability and eligibility decision-making. Furthermore, he created standard HR operating procedures and oversaw the development and delivery of investigations training.

Mr. Hamrick also served as the Deputy Assistant Commissioner at the U.S. Customs and Border Protection in the Office of Professional Responsibility. In this capacity, he led investigations and intelligence operations focused on insider threats, employee misconduct, financial fraud, and public corruption complaints. In addition, he directed personnel security operations, including background investigations, polygraph examinations, and suitability and eligibility adjudications.

ALLEN GINA

Mr. Allen Gina is the Co-Founder of CT Strategies, which provides strategic services to clients seeking current and innovative insight into border management and supply chain challenges in the United States and around the world.

Prior to establishing CT Strategies, Mr. Gina served as Assistant Commissioner for International Trade at U.S. Customs and Border Protection. As Assistant Commissioner, he oversaw a workforce of more than 1,000 employees and a budget of over \$300 million and was responsible for leading the most extensive trade transformation initiative in CBP's history.

Prior to serving as Assistant Commissioner for International Trade, Mr. Gina served as the Assistant Commissioner for International Affairs, Assistant and Deputy Assistant Commissioner for Intelligence and Operations Coordination, and Executive Director for the Joint Operations Directorate at CBP. He was appointed to the Senior Executive Service in 2004 as the Executive Director of the Container Security and Secure Freight Initiatives. Prior to entering the Senior Executive Service, Mr. Gina served as Customs Inspector, Supervisory Customs Inspector, Chief Customs Inspector, and Area Port Director, as well as the Director of various offices, including the Customs Industry Partnership Program, the Customs Outbound Program, and the Customs Office of Border Security.

Throughout his 30 plus-year career at CBP and its predecessor agency, the U.S. Customs Service, Mr. Gina has been a pioneer and a leader, developing broad and far-reaching national and international programs to support anti-terrorism and trade transformation policies. Prior to and during the first year of operation of the Department of Homeland Security, Mr. Gina was assigned to the Border and Transportation Security Directorate as Director of Agency Coordination to help establish policies and procedures.

CHRIS PIGNONE

Mr. Chris Pignone is a Deputy Director in the Office of Internal Affairs at U.S. Customs and Border Protection and is responsible for many of the systems and processes that are discussed in this guide. Mr. Pignone was integral in the creation of the CBP IA and HR departments when U.S. Immigration and Customs Enforcement (ICE) and CBP split into two separate agencies, and he brings his experience in organization structuring, hiring, training, and resource development.

SILVIA SANTOS

Ms. Silvia Santos has 20 years of experience in Mexican Customs (Servicio de Administración Tributaria [SAT]) and foreign trade. Her experience is not only as a Customs official at different ports of entry across Mexico but also in the private sector as a training leader for a multinational corporation, managing one of the Customs projects of high significance for SAT and the Mexican government. This experience training Customs staff was essential for developing recommendations on the effective training and retention of IA personnel.

GUILLERMO DELGADILLO

Mr. Guillermo Delgadillo is a Task Force Agent with U. S. Customs and Border Protection, Office of Professional Responsibility assigned to the Rio Grande Valley, Texas, office located in McAllen, Texas. He has been a Task Force Agent since June 2016, and he is the Chief CBP Officer at Hidalgo, Texas, Port of Entry.

Mr. Delgadillo began his federal law enforcement career as a U.S. Border Patrol Agent at the San Clemente, California, Station in April 1990. He transferred to U.S. Customs and was assigned to the Roma, Texas, Port of Entry as a U.S. Customs Inspector, and he worked his way up to Supervisory Customs Inspector at the Port of Laredo, Texas. In 2007, Mr. Delgadillo was promoted to the position of Chief CBP Officer at the Hidalgo, Texas, Port of Entry. Prior to his federal career, he served as a police officer in Laredo, Texas.

ROBERT WATT

Mr. Robert Watt is a Senior Consultant at CT Strategies, which provides strategic services to clients seeking current and innovative insight into border management and supply chain challenges in the United States and around the world. Mr. Watt has over 33 years of federal service with U.S. Customs and Border Protection and the U.S. Customs Service. During his career, he was widely recognized as a border management and security expert, specifically in regard to the implementation and use of Non-Intrusive Inspection technology to enhance the efficiency and security of trade and travel. Mr. Watt also previously worked in the Office of Professional Responsibility and was responsible for red teaming and testing the current systems.

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