



CBP Integrity and Accountability Strategy



U.S. Customs and
Border Protection

Ethos of U.S. Customs and Border Protection

*We are the guardians
of our Nation's borders.*

We are America's frontline.

*We safeguard the American
homeland at and beyond
our borders.*

*We protect the American
people against terrorists and
the instruments of terror.*

*We steadfastly enforce the
laws of the United States
while fostering our Nation's
economic security through
lawful international
trade and travel.*

*We serve the American people
with vigilance, integrity,
and professionalism.*

Members of the U.S. Customs and Border Protection Honor Guard honor fallen comrades during the Annual Blue Mass in Washington, D.C.



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Foreword

Integrity is the cornerstone of U.S. Customs and Border Protection (CBP)'s organizational culture, whether in the principles of the U.S. Customs Service from 1789, the 1926 Honor First motto of the U.S. Border Patrol, or through its multiple iterations to become today's CBP standing on our nation's frontlines as the United States' largest federal law enforcement agency. We have long recognized organizational integrity means much more than managing illegal behavior or misconduct — it requires promoting a genuine and lasting culture of integrity, consistent transparency, and unwavering accountability. Ensuring our CBP climate encourages and promotes exemplary behavior requires a more comprehensive approach that goes beyond mere compliance models.

This *CBP Integrity and Accountability Strategy* therefore builds upon CBP's previous strategy to broaden the focus of integrity in the agency beyond corruption and misconduct to better reflect an enterprise-wide commitment to integrity and accountability.

The goals and associated objectives detailed in this strategy are designed to promote and ensure the demonstration of character by our leaders, advance an enduring culture promoting our core values; manage risks by understanding root causes for poor decision making; communicate our commitment to safety, security, and prosperity to maintain the public trust; and to enhance mission performance by empowering our workforce to uphold our standards.

Our Integrity and Accountability Strategy is fashioned from input at multiple levels across CBP and advances our commitment to establish an organizational culture that transcends societal norms and reflects the virtues embodied in our core values of **vigilance, service to country, and integrity**. The Integrity and Accountability Strategy has been reviewed and approved by the senior-most leadership comprising the agency's **Integrity Leadership Committee (ILC)**. Their efforts reflect that the leadership of CBP is wholly committed to these objectives and to be accountable for consistently communicating, promoting, and demonstrating integrity.

Ensuring our CBP culture exemplifies our core values in all we do is a generational commitment, and we will remain focused and deliberate in establishing, promoting, and enforcing our standards from recruitment to retirement through training, leadership development, and by retaining those who embody the virtues and character the American people deserve in service to our nation.



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



U.S. Customs and Border Protection

U.S. Customs and Border Protection (CBP) is entrusted with and committed to carrying out its homeland security missions with professionalism, honor, and integrity. Integrity is the cornerstone of its organizational culture, from the 1789 founding of the U.S. Customs Service, through the 1924 founding of the U.S. Border Patrol, and the organizational evolutions with the Departments of Justice, Treasury, Agriculture, and Homeland Security, to the CBP of today. CBP's culture is defined and shaped by its core values of *Vigilance, Service to Country, and Integrity*. CBP employees are selfless, driven, and inspired by their commitment to serve others and protect the nation. The CBP workforce is held to the highest standards of honest and ethical behavior, both on and off duty.

Organizationally, CBP promotes standards of behavior and performance reflecting integrity, transparency, and accountability. This *CBP Integrity and Accountability Strategy* of 2023 builds upon and enhances the previous *Integrity and Personal Accountability Strategy* of 2014. Reflected in both strategies is the underlying principle that each CBP employee is responsible for upholding and embodying CBP's core values on and off the job. The 2014 Strategy focused on four mission areas: Prevention, Detection, Investigation, and Response with the emphasis on identifying and addressing corruption and misconduct in the workforce. While the 2014 strategy emphasized compliance with the "Anti-Border Corruption Act of 2010" enacted by Congress as Public Law 111-376, CBP is expanding the 2023 strategy to include a more holistic strategic approach in this revision.

This holistic approach focuses on influencing and enhancing a culture always reflective of CBP's core values and emphasizes an enterprise-wide commitment to Integrity. Organizational integrity means more than addressing illegal behavior, mismanagement, or misconduct — it requires an

enduring culture of excellence, transparency, and accountability. A comprehensive approach that goes beyond compliance alone is necessary to ensure a CBP culture that engenders a shared purpose and exemplary behavior. CBP's 2023 strategy strives to accomplish that by ensuring integrity, accountability, and transparency to the American public, partners, stakeholders, as well as to our workforce.

We recognize that our cultural vision is achieved and maintained when every CBP employee personifies the intent and spirit of the core values. The agency's leadership is further accountable for demonstrating selfless service, commitment to mission accomplishment, and unyielding professionalism to maintain public trust. CBP's leaders must therefore continue to promote and demonstrate the established cultural norms to influence others to follow. Organizationally, we must promote and reinforce a system of shared principles that guide professional and personal conduct that leads to an overall sense of belonging. Our intent is that this strategy amplifies professional expectations and influences meeting our goals while encouraging positive change where needed for CBP, our families, communities, and the public we serve.

CBP has identified the following goals for the Integrity and Accountability Strategy to achieve CBP's vision for integrity and accountability across all levels of the agency

- **GOAL 1 - Shape, model, and promote a culture reflecting CBP's core values**
- **GOAL 2 - Cultivate goodwill and preserve public trust**
- **GOAL 3 - Ensure accountability for misconduct and mismanagement** ■

Vision for the CBP Integrity and Accountability Strategy

“Assure public trust and mission excellence through embodiment of CBP’s core values.”

CBP’s core values of vigilance, service to country, and integrity will continue to serve as the bedrock of CBP’s culture to ensure unwavering commitment to the highest levels of professionalism in ensuring the flow of legal commerce, serving the public, and protecting the nation. Promoting a culture of excellence requires that employees embody and personify these core values. Every member of the agency must demonstrate our collective beliefs to ensure cohesion. CBP will continue to enhance a culture of excellence to remain adaptive to increasing complexity in the operating environment and to proficiently execute our diverse mission requirements. The CBP culture must also be known as one empowering its employees to reflect agility, efficiency, and innovation.

CBP’s Core Values — The CBP workforce takes remarkable pride in its enduring missions and core values. CBP’s workforce must always have a shared understanding of the importance of these values and embed them in the culture of the agency.

■ **Vigilance** is our commitment to ensure the safety, security, and prosperity of Americans, as well as all those individuals we encounter. We are continuously watchful and alert to deter, detect and prevent threats to our nation. We demonstrate courage and valor in the protection of our nation.

■ **Service to Country** is embodied in the work CBP does. CBP’s workforce is dedicated to defending and upholding the Constitution of the United States. The American people have entrusted CBP to protect the homeland and defend liberty.

■ **Integrity** is CBP’s cornerstone. The workforce is guided by the highest ethical and moral principles, and its actions bring honor upon themselves and the agency.¹

These core values provide the foundation of CBP’s culture of excellence and help promote a spirit of service and a sense of belonging. Embodying this culture requires that CBP’s workforce goes beyond these core values to ensure accountability, transparency, and strong leadership. ■

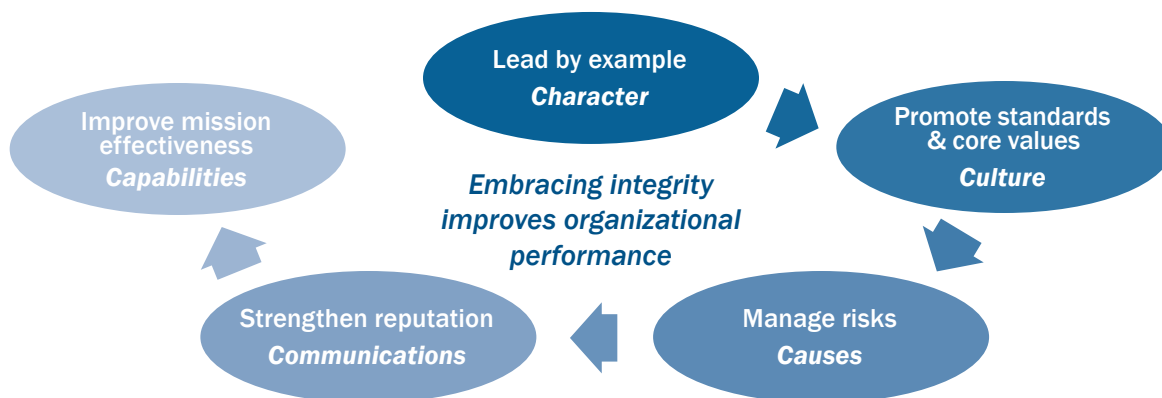
¹ CBP’s core values: <https://www.cbp.gov/about> accessed on April 26, 2022.

Themes Supporting Our Strategy

While the key elements of this 2023 strategy include a culture of excellence, transparency, and accountability, CBP also identified five interdependent integrity and accountability themes that underpin our strategic goals to enhance organizational culture and performance.

Depicted on the following page are five mutually supporting themes to establish the foundational principles for an enduring and meaningful culture of integrity and accountability for CBP:

Themes Supporting Our Strategy



■ **Character — Lead by example**

Those officials serving in law enforcement organizations are held to a higher standard than the public they serve because of the responsibilities they carry, and the authorities they enforce. As such these officials are beacons within the community they serve who should at all times set a positive example for others to follow. We also recognize CBP is comprised of more than 60,000 professionals whose actions are magnified in the eyes of the public. The daily actions of CBP employees must reflect honesty, integrity, selflessness, and dignity. These traits define the desired character of individuals, and the image of the agency.

■ **Culture — Promote standards and core values**

The CBP core values are the foundation for the CBP organizational culture. This strategy is intended to amplify professional expectations and influence positive outcomes for CBP, its families, communities, and the public it serves. CBP's Standards of Conduct details its purpose, "To maintain a workforce that demonstrates high standards of ethical and professional conduct in order to ensure efficient performance of government service." Beyond the standards of conduct and behavior models, CBP's culture transcends the workday and is fundamentally about selfless service, commitment to mission accomplishment, and dignity toward those with whom we interact.

■ **Causes — Manage risks**

Understanding the underlying reasons that may be the catalyst for individuals deviating from the agency's cultural norms will help CBP be proactive in managing these potential causes. CBP must do its best to provide early intervention to those who may be struggling on and/or off the job. The agency wants to help enable individuals to rebound when they make poor choices. By recognizing and managing potential risks, CBP can be proactive in its efforts to help prevent or correct mismanagement, while addressing misconduct across the workforce.

■ **Communications — Strengthen reputation**

CBP is responsible for ensuring the safety, security, and prosperity of the American people, and it is incumbent upon its employees at all levels to convey that critical purpose to CBP stakeholders. CBP needs to consistently provide meaningful information to its workforce and the public it serves, whether it is promoting mission successes or providing transparency related to misconduct allegations. Establishing meaningful dialogue, and follow through, with partners, stakeholders, and other interested parties sets the foundation for trust. Consistent communication with external audiences strengthens the agency's reputation through demonstrated accountability and transparency. CBP also needs to honor and implement the commitments communicated.

■ **Capabilities — Improve mission effectiveness**

Fostering and promoting our CBP culture of selfless, committed, and dignified service across the CBP workforce significantly enhances overall mission effectiveness. Advancing this as CBP's generational cultural norms strengthens the agency, improves its overall mission execution, and engenders trust, while promoting a positive reputation with those we serve. ■

¹ CBP Standards of Conduct, Directive Number 51735-013B, dated December 9, 2020.



A CBP officer at a wreath laying ceremony during National Police Week.

Photo by Donna Burton

GOAL 1:

Shape, model, and promote a culture reflecting CBP's core values

■ Overview

CBP is a diverse agency with vast responsibilities and several legacy organization sub-cultures. Yet it is our differences that make us stronger, along with a shared sense of purpose and a unifying culture that emphasizes mission first, people always. *Vigilance, service to country, and*

integrity are not merely concepts, rather they are the essence of CBP's culture. They are the agency's promissory note to the public and our partners to deliver safety, security, and prosperity – selflessly and honorably. It is these traits CBP seeks in applicants during the hiring process, and what we expect as we train leaders at all levels. These enduring values provide the foundation for a culture of excellence with full accountability and transparency. CBP personnel embrace these shared values and are not only expected to reflect them professionally, but they are also inspired to demonstrate them personally. CBP personnel are also charged to demonstrate strong character and to serve as role models within the communities CBP serves. Seeing examples of strong character, integrity, and service to country highlight what the public expects of CBP and what CBP expects of itself. Understanding CBP's cultural norms and anticipating when agency values may be compromised aids in CBP's ability to mitigate and intervene before personnel stray from the ethical standards CBP maintains. ■



Office of Professional Responsibility employee conducts a polygraph examination.

Desired Outcome:

Standards for personal and professional character defined, promoted, and continually modeled by all CBP employees.

Outcome Measure:

Consistent workforce engagement to acknowledge positive manifestations, and management efforts to stem causes for poor decision making.

Objective 1.1

Reinforce CBP's core values and incorporate them into performance plans, assessments, and training.

CBP's core values should not be considered aspirational, but rather inherent to everything we do. The goal is for our core values to be deeply ingrained principles that guide the agency and its workforce. These values are enduring, long lasting, and fundamental to the agency's mission. The core values should therefore never be compromised for convenience or short-term gain. It is incumbent upon CBP's leadership to reinforce these shared values to strengthen the character of individuals, while enhancing the overall capabilities of the agency. Accordingly, the core values should always be reflected in the actions of CBP's leadership and institutionalized through performance plans and assessments as well as through CBP training at all developmental levels, from the training academies to preparation for Senior Executive Service. ■

Objective 1.2

Promote and communicate agency integrity standards, core values, and workforce expectations.

The men and women of CBP take pride in their work, in their service to our country, and in upholding the values that make CBP a premier law enforcement agency in the United States. The core values must therefore be continually communicated and visible to the workforce for these core values to resonate with CBP personnel. The workforce must understand what the agency's expectations are through consistent and continuous messaging. These expectations should also be communicated and socialized with the public and other stakeholders.

CBP employees at all levels need to understand that their behavior has associated consequences, be it positive or negative. Leading by example at all levels of the agency will further the institutionalization of CBP's standards of conduct and core values. Through these actions, reinforced by constant messaging, CBP must continue to foster and grow an environment that amplifies the message that honor and integrity are at the core of this agency and its personnel. ■

Objective 1.3

Anticipate, mitigate, and combat root causes for poor decision making.

Life can be demanding, and stresses come from many sources to include work, home, and health, as well as pressures from society and unforeseen circumstances such as those resulting from the COVID-19 pandemic and additional strains placed on the workforce. Focusing on employees' overall well-being is a critical aspect of ensuring that the workforce maintains the cultural norms CBP has established. When cracks emerge in the foundation of CBP's workforce, we must identify the cause of those stressors and intervene as appropriate. Intervention may include resources tailored to the situation, which can range from resiliency and wellness programs to mentoring and training. Anticipating these needs is critical to mitigating potentially harmful decisions or actions which may have unintended consequences that negatively impact public safety. Remaining connected to the workforce is essential to identifying and mitigating potential adverse consequences. Providing a safe and trusting environment for employees to share personal or professional struggles with their coworkers, supervisors, or mentors is a key step to enhancing the agency culture. Proactively addressing root causes of behaviors and actions that would compromise the individual serves the demands of the agency, while ensuring the safety and security of our Nation. ■



Photo by Ozzy Trevino

Air and Marine Operations air crews respond to affected areas along Florida's coast after a hurricane.



CBP photo by Ozzy Trevino

A CBP officer assists a traveler with the Global Entry process and Miami International Airport.

GOAL 2: Cultivate goodwill and preserve public trust

■ Overview

CBP's Standards of Conduct clearly state that "CBP and its employees must sustain the trust and confidence of the public they serve. All employees must maintain high standards of honesty, integrity, impartiality, character, and professionalism to ensure the proper performance of government business and the continued trust and confidence of the public... and a standard of personal behavior that reflects positively upon, and will be a credit to, both CBP and its employees."³ The American people have placed their trust in the men and women of CBP to carry out its mission with professionalism, honor, and integrity.

The actions of CBP's workforce reflect the agency's values and helps cultivate trust with its stakeholders, including the public CBP protects and serves, elected officials, and federal, state, local, tribal, and international partners. CBP will continue to strive to be ever more transparent and accountable to its stakeholders to preserve trust and strengthen its reputation.



An Air and Marine Operations crew prepares to land and pick up Border Patrol Search, Trauma, and Rescue Unit (BORSTAR) agents after a search and rescue mission.

Photo by Alexander Zamora

In May of 2022, CBP issued a new directive to enhance transparency. "Maintaining the public's trust is vital to CBP's mission and...is part of a broader accountability and transparency effort to maintain and foster that trust. The public release of CBP Directives and Policy Directorate (PD) Memos, where appropriate, is consistent with the best

³ U.S. Customs and Border Protection Standards of Conduct, Directive: 51735-013B, December 9, 2020.

practices and transparency recommendations from a variety of outside organizations and independent assessments. The public release of CBP Directives and PD Memos also aligns CBP with similar transparency initiatives underway across the Department of Homeland Security (DHS) and throughout the U.S. Government.”⁴ Records are the backbone of open government. Faithfully creating records that adequately and properly document our decisions, actions, and transactions builds internal and external trust and demonstrates our integrity. Making those records available for public review therefore reinforces our transparency and willingness to be held accountable. ■

Desired Outcome:

Maintain organizational integrity worthy of the public trust through timely and transparent communications with employees and stakeholders.

Outcome Measure:

Continue to share timely, recurrent, and transparent communications regarding organizational integrity and accountability to all stakeholders.

Objective 2.1

Communicate CBP’s commitment to the Nation’s safety, security, and prosperity.

Essential to assuring public trust is communicating CBP’s vision and mission focus to provide safety, security, and prosperity for the American people. To successfully carry out its complex mission requirements, CBP needs to maintain the trust of the public, including key stakeholders. CBP’s focus on integrity, accountability, and professionalism is only as good as its commitment to those principles. The public expects CBP to hold itself to high standards, and CBP’s leadership and its workforce demands the same. Every day, CBP personnel put their lives on the line by diligently safeguarding the country’s borders and deterring, detecting, and preventing threats to the nation while being accountable to CBP’s core values and to themselves.

CBP’s professional reputation depends on its ability to be transparent through strategic communications, stakeholder engagement, and providing timely and accurate information. Because CBP’s mission is critical to keeping this country and its people safe, it is equally important that CBP’s communications continue to provide the timely information the public needs and should expect. It is also important to recognize that CBP has multiple stakeholders, and we need to be vigilant in reaching out to them. ■

Objective 2.2

Be responsive and transparent regarding inquiries and complaints.

To preserve the public trust, CBP has a responsibility to respond to external inquiries in a timely manner. Communicating information promptly enhances the agency’s ability to be transparent and to ensure that accurate information is being reported. In some circumstances, such as pending investigations, information shared may be limited by privacy laws as well as investigative integrity issues, which should be acknowledged and communicated. However, the agency will actively seek to keep its overseers, partners, and stakeholders fully informed.

CBP’s reputation is only as strong as the trust and faith the public has in the agency to protect the American people, safeguard our borders, and enhance the Nation’s economic prosperity. To aid in effective communication, CBP disseminates information across several social media platforms, regularly issues press releases about noteworthy events, provides monthly updates on the agency’s enforcement and seizure statistics, and keeps the public apprised of policy changes that may impact travel, trade, commerce, or the safety of the Nation. CBP’s Accountability and Transparency webpage also helps secure trust by providing multiple ways to report incidents as well as timely, accurate, and appropriate information regarding CBP-related deaths, use of force incidents and other critical incidents resulting in serious injuries. The Accountability and Transparency site also

⁴ U.S. Customs and Border Protection Public Release of CBP Directives and Policy Directorate Memorandums, Directive: 5430-001, May 2022.

provides the public with statements, policies, reports, and other valuable information concerning critical incidents and investigations.⁵ ■

Objective 2.3

Publish recurring information detailing audit findings, inspection results and investigations.

CBP publishes information on internal and external audits, inspections, and investigations, as allowable by law, to promote and ensure a strong culture of integrity and to maintain public trust and confidence.

Additionally, CBP discloses the associated discipline and other administrative outcomes regarding investigations and dispositions of allegations of employee misconduct. In FY2020, CBP institutionalized the sharing of this type of information by producing what is now an annual publication entitled, *Internal Investigations and Employee Accountability Report*. This report provides key statistics on the input, investigative activity, and disciplinary actions taken against CBP employees and provides updates on new transparency and accountability initiatives.

CBP therefore needs to continue to share information with the public not just about internal investigations, but the full spectrum of CBP’s mission and highlighting the many positive outcomes, along with any of the agency’s identified shortcomings to be corrected. ■



⁵ CBP website: <https://www.cbp.gov/newsroom/accountability-and-transparency> accessed on April 26, 2022.

⁶ “Report on Internal Investigations and Employee Accountability Fiscal Year 2021,” p.3.

Air and Marine Operations provide support to communities impacted by a hurricane in Beaumont, Texas.



CBP Photo by Glenn Fawcett

U.S. Border Patrol agents patrol ranchlands in Hebbronville, Texas.

GOAL 3:

Ensure accountability for misconduct and mismanagement

■ Overview

CBP expects the highest level of professionalism from the workforce at all levels to ensure a culture of integrity and accountability. Each employee must uphold CBP's Standards of Conduct and core values. CBP personnel are not only accountable to one another, but also to the American public. As such, oversight is needed to ensure that if there are allegations of misconduct, mismanagement, or discrimination, due diligence is taken to investigate and to hold violators accountable for their actions and that disciplinary action is fair and consistent. ■

Desired Outcome:

Ensure the principles and standards for integrity and accountability are consistently enforced across CBP.

Outcome Measure:

Evidence of proactively leveraging technology and integrity programs that hold everyone accountable to performance above reproach.



A CBP forensic scientist and a CBP officer examine and extract an unknown substance that was concealed inside a parcel.

Objective 3.1

Apply accountability mechanisms across the spectrum of misconduct and mismanagement.

CBP uses a variety of accountability mechanisms such as annual financial disclosures, random drug testing, and the constant monitoring of CBP's various information technology (IT) systems to help detect potential violations of CBP's Standards of Conduct. As applications become available, CBP must proactively identify and implement technology and other integrity-based programs to assure we perform our mission above reproach. Additionally, CBP's Integrity Leadership Committee, (formerly the Integrity Programs Integration Committee), is an agency-wide body created to integrate, promulgate, and facilitate integrity programs and initiatives across the CBP enterprise, and should be engaged to identify other mechanisms to flag potential misconduct and mismanagement concerns to recommend areas where intervention or remediation may be required. ■

Objective 3.2

Leverage investigative and progressive disciplinary processes.

The agency's commitment to integrity includes a thorough initial screening of applicants, pre-employment polygraph examinations of law enforcement candidates, and a comprehensive background investigation. Additionally, CBP maintains strong partnerships with the Office of Inspector General, the Federal Bureau of Investigation, and other investigative entities. These investigative tools combined enhance CBP's ability to identify vulnerabilities and allow for a thorough vetting of the men and women seeking employment. Periodic reinvestigations and continuous evaluations are utilized throughout an employee's career to identify emerging integrity and conduct concerns.

To foster and strengthen our culture of excellence, CBP must strive to make its disciplinary process efficient yet fair, consistent in both the process and the result, and transparent to both the workforce and the public. CBP is committed to reviewing its disciplinary process and finding new ways to increase the efficiency, accountability, fairness, and consistency of its adjudication of allegations of misconduct.⁷

CBP is committed to a progressive disciplinary process and is investing in risk identification and risk mitigation. Interventions, when appropriate, will include a series of increasingly formal efforts to provide feedback to employees so that they can correct the identified concerns. When misconduct is identified, CBP maintains consistent standards for disciplinary actions to include removal from the service for offenses that warrant separation from the agency. The goal of progressive discipline is to be corrective in nature and serve to assist employees to overcome potential incidents of misconduct. Agency leadership believes this approach to accountability is most successful when it helps employees to remain effective members of the organization by providing resources needed to course correct. ■

Objective 3.3

Be transparent to the workforce regarding disciplinary actions.

Being transparent about expectations and consequences needs to be consistently messaged to the workforce from the day employees onboard as well as throughout their career. Fostering a transparent environment that promotes ethics, equity, and clear expectations of consequences is important when cultivating a culture of integrity and accountability. In addition, creating a safe and trusting environment where personnel feel comfortable enough to report potential violations without fear of retaliation or betrayal is another crucial factor when seeking transparency and trust. ■

⁷ CBP Integrity and Personal Accountability Strategy 2014, p. 12.



Office of Field Operations Special Response team members work together with Air and Marine Operations to train and qualify in helicopter rope suspension techniques.

Assure
public trust
and mission
excellence
through
embodiment
of CBP core
values.



U.S. Customs and
Border Protection

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