



April 2022

# SOUTHWEST BORDER

## CBP Should Improve Data Collection, Reporting, and Evaluation for the Missing Migrant Program

# GAO Highlights

Highlights of [GAO-22-105053](#), a report to congressional committees

## Why GAO Did This Study

Border Patrol, within U.S. Customs and Border Protection (CBP), responds to reports of migrants attempting to enter the U.S. between ports of entry who may be missing or in distress. A committee report accompanying the Department of Homeland Security's (DHS) fiscal year 2020 appropriation directed CBP to report data on migrant deaths, describe plans to help reduce the number of migrant deaths, and share its coordination efforts with external entities. The Joint Explanatory Statement accompanying the fiscal year 2021 Consolidated Appropriations Act included a provision for GAO to review CBP's report and its efforts to mitigate migrant deaths.

This report addresses (1) how Border Patrol has implemented the Missing Migrant Program to help reduce the frequency of migrant deaths; (2) the extent to which Border Patrol collects and reports complete and accurate data on migrant deaths; and (3) how Border Patrol evaluates the Missing Migrant Program. GAO analyzed Border Patrol policies and documentation, interviewed officials at Border Patrol headquarters and four field locations, and from five external entities, such as medical examiners.

## What GAO Recommends

GAO is making three recommendations to Border Patrol to take steps to ensure it collects and records available information on migrant deaths, including those identified by external entities; include known migrant deaths and any data limitations in public and Congressional reports; and develop a plan to evaluate the Missing Migrant Program. DHS concurred with the recommendations.

View [GAO-22-105053](#). For more information, contact Rebecca Gambler at (202) 512-8777 or [GamblerR@gao.gov](mailto:GamblerR@gao.gov).

April 2022

## SOUTHWEST BORDER

### CBP Should Improve Data Collection, Reporting, and Evaluation for the Missing Migrant Program

## What GAO Found

The U.S. Border Patrol set up the Missing Migrant Program in 2017 to help rescue migrants in distress and reduce migrant deaths along the southwest border. Border Patrol issued nationwide procedures in September 2021, and has coordinated with external entities (e.g., state and local officials) and undertook various efforts to help reduce the frequency of migrant deaths. In particular, the nationwide procedures are intended to help standardize how Border Patrol coordinates with external entities to respond to and track reports of missing and deceased migrants. Border Patrol has also undertaken various efforts to help respond to migrants who may be in distress. These efforts include placing rescue beacons and 9-1-1 placards in remote areas.

### Memorial for a Deceased Migrant in the Southwest Border



Source: Christina Felschen/stock.adobe.com. | GAO-22-105053

Border Patrol has not collected and recorded, or reported to Congress, complete data on migrant deaths, or disclosed associated data limitations. Specifically, Border Patrol's fiscal year 2020 report to Congress did not contain complete data because the agency did not record all available information on migrant deaths from external entities in its system of record, or describe these data limitations in the report. By taking additional steps to ensure that it collects and records available information on migrant deaths, including all known migrant deaths discovered by external entities, and including known migrant deaths and any data limitations in public and Congressional reports, Border Patrol would improve the information it provides to Congress.

Border Patrol collects and reviews information at the field level about its implementation of the Missing Migrant Program. However, it does not have a plan to evaluate the program overall. Border Patrol headquarters uses weekly field reports to monitor the status of the Missing Migrant Program. These reports are positive steps to help the agency monitor field activities. However, Border Patrol could benefit from a more robust evaluation of the impacts of the Missing Migrant Program to reduce the frequency of migrant deaths and strengthen Border Patrol's efforts to respond to migrants in distress. Developing a plan to evaluate the Missing Migrant Program would better position Border Patrol to assess its progress in meeting the program's goals.

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## Abbreviations

BSITS	Border Safety Initiative Tracking System
CBP	U.S. Customs and Border Protection
DHS	Department of Homeland Security

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April 20, 2022

The Honorable Christopher Murphy  
Chairman  
The Honorable Shelley Moore Capito  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
United States Senate

The Honorable Lucille Roybal-Allard  
Chairwoman  
The Honorable Chuck Fleischmann  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
House of Representatives

U.S. Customs and Border Protection (CBP), within the Department of Homeland Security (DHS), is the lead agency responsible for border security, including securing the nearly 2,000 mile southwest border with Mexico.<sup>1</sup> U.S. Border Patrol, within CBP, is responsible for securing U.S. borders between ports of entry to prevent individuals and goods from entering the U.S. illegally.<sup>2</sup> As part of its border security role, Border Patrol responds to reports of migrants attempting to enter the U.S. between ports of entry who may be missing or in distress.

Border Patrol press releases describe some of the dangers migrants experience in their attempts to enter the U.S.<sup>3</sup> For example, according to

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<sup>1</sup>See 6 U.S.C. § 211. Among other responsibilities, CBP is responsible for facilitating the flow of legitimate travel and trade at our nation's borders and detecting and interdicting terrorists, drug smugglers, human traffickers, and other threats to the security of the U.S.

<sup>2</sup>Ports of entry are facilities that provide for the controlled entry into or departure from the U.S. Specifically, a port of entry is any officially designated location (seaport, airport, or land border location) where DHS officers or employees are assigned to clear passengers and merchandise, collect duties, and enforce customs laws, and where DHS officers inspect persons entering or applying for admission into or departing the U.S. pursuant to U.S. immigration and travel controls.

<sup>3</sup>See Department of Homeland Security, U.S. Customs and Border Protection, *Migrant Deaths Serve as Grim Reminder of Dangers of Human Smuggling* (Edinburg, Texas: Aug. 26, 2021).

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one of these press releases, smugglers attempting to cross the Rio Grande River in Texas with migrants have overfilled rafts, causing the rafts to capsize, or filled trailers with large numbers of people in unventilated containers for hours at a time. Border Patrol press releases have also described instances of smugglers leaving migrants behind when they could not keep up with the group. Border Patrol agents along the southwest border report that 9-1-1 calls from lost individuals have become a daily occurrence. To address this long-standing issue, Border Patrol initiated the Missing Migrant Program in 2017 to help rescue migrants in distress and reduce migrant deaths along the southwest border. According to a CBP report, more than 4,900 individuals were rescued and about 300 deceased migrants were found along the southwest border in fiscal year 2019.<sup>4</sup>

Congress has expressed concern regarding migrant deaths occurring along the southwest border. A committee report accompanying DHS's fiscal year 2020 appropriation directs CBP to, among other things, report data on migrant deaths, describe plans to help reduce the number of migrant deaths, and describe its coordination efforts with external entities.<sup>5</sup> The Joint Explanatory Statement accompanying the fiscal year 2021 Consolidated Appropriations Act included a provision for us to review CBP's report and its efforts to mitigate migrant deaths.<sup>6</sup> This report addresses (1) how Border Patrol has implemented the Missing Migrant Program to help reduce the frequency of migrant deaths; (2) the extent to which Border Patrol collects and reports complete and accurate data on migrant deaths; and (3) how Border Patrol evaluates the Missing Migrant Program.

To address how Border Patrol implemented the Missing Migrant Program, we reviewed Border Patrol policies and Missing Migrant Program documents, including those for coordinating with external entities and deploying tools to help reduce migrant deaths. We also obtained information on the number of rescue beacons and 9-1-1 placards Border

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<sup>4</sup>Department of Homeland Security, U.S. Customs and Border Protection, *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* (2021).

<sup>5</sup>See H.R. Rep. No. 116-180 (2019), and Consolidated Appropriations Act, 2020, Pub. L. No. 116-93, 133 Stat. 2317 (2019). We use the term external entity to refer to any government or organization that coordinates with Border Patrol on migrant deaths, including federal, state, local, or tribal entities, medical examiner's offices, foreign consulates, and nongovernmental organizations.

<sup>6</sup>166 Cong. Rec. H8471 (daily ed. Dec. 21, 2020).

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Patrol deployed along the southwest border. We interviewed headquarters officials about the status of the Missing Migrant Program and coordination efforts with external entities. We obtained Border Patrol sector-level perspectives from officials representing four of the nine sectors responsible for operations along the southwest border—Laredo, Rio Grande Valley, San Diego, and Tucson.<sup>7</sup> We selected these sectors to reflect a range of reported numbers of migrant deaths and rescues from fiscal years 2015 through 2019, as well as varied geographic location and terrain. These four sectors accounted for about 80 percent of the migrant deaths CBP reported along the southwest border from fiscal years 2015 through 2019.

We also interviewed representatives from five external entities that operate within the Border Patrol sectors we contacted. They included Águilas del Desierto, a nonprofit organization that conducts search and rescue missions along the southwest border; the Brooks County Sheriff's Office and Webb County Medical Examiner's Office in Texas; the San Diego County Sheriff's Office in California; and the Pima County Medical Examiner's Office in Arizona. We selected these entities to reflect variation in location and type among the entities with whom Border Patrol officials stated they regularly coordinate. The information we collected from interviews with Border Patrol sector officials and external entities cannot be generalized, but provided perspectives on Border Patrol's efforts to help reduce migrant deaths along the border, and coordination with Border Patrol officials in the Missing Migrant Program.

To address the extent to which Border Patrol collects and reports complete and accurate data on migrant deaths, we analyzed Border Patrol documents, such as its database user manuals and methodology guides, and Border Patrol's 2020 report to Congress on migrant deaths.<sup>8</sup> We also observed a Border Patrol demonstration of its Border Safety Initiative Tracking System (BSITS), which it uses to record information on migrant rescues and deaths. We also interviewed headquarters and sector-level Border Patrol officials regarding their practices for collecting and maintaining data. We evaluated the extent to which Border Patrol's data recording and reporting efforts align with agency policies,

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<sup>7</sup>Along the southwest border, Border Patrol divides responsibility for border security operations geographically among nine sectors that include border stations.

<sup>8</sup>Department of Homeland Security, U.S. Customs and Border Protection, *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* (Washington, D.C.: 2021).

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congressional directives, federal law, and federal internal control standards.<sup>9</sup> Specifically, we reviewed Border Patrol efforts against the internal control standard that calls for management to use quality information to achieve the agency's objectives and evaluate the reliability of data sources to make informed decisions. As part of our assessment, we compared BSITS data for the Tucson sector with publicly reported data on migrant deaths from the Arizona OpenGIS Initiative for Deceased Migrants, a collaborative effort between the Pima County Medical Examiner's Office and Humane Borders, Inc.<sup>10</sup> We interviewed the Pima County Medical Examiner, whose data accounted for over 90 percent of the cases from fiscal years 2015 through 2019, to understand how the data are compiled and used and to discuss the steps the office undertakes to ensure data reliability. We found the data were sufficiently reliable for reporting the number of migrant deaths in the Tucson sector recorded through that Initiative.

To address how Border Patrol evaluates the Missing Migrant Program, we reviewed Border Patrol documentation, including program guidance and sectors' weekly reports to headquarters. We also interviewed headquarters and sector-level program officials. We assessed these efforts against federal internal control standards for establishing and operating activities to monitor internal control systems and evaluate results, leading practices for evaluation, which include developing an

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<sup>9</sup>See Office of Border Patrol, Border Safety Initiative Tracking System (BSITS) User Manual (Washington, D.C.: 2007); Department of Homeland Security, Information Quality, Directive 139-02 (Nov. 21, 2019); Department of Homeland Security, Information Quality Implementation, Instruction, 139-02-001 (November 27, 2019); GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 10, 2014).

<sup>10</sup>Humane Borders, Inc. is a non-profit that established a system of water stations in the Sonoran Desert on routes used by migrants to prevent death by dehydration or exposure. The Pima County Medical Examiner told us that Humane Borders, Inc. uses data on migrant deaths to inform water station placement. The Medical Examiner's Office uses the data when remains are found to determine if additional remains were found nearby that could be part of the same body, since skeletal remains are often spread out by the time they are discovered. The Pima County Medical Examiner serves as the medical examiner for five Arizona counties, including Cochise, Graham, La Paz, Pima, and Santa Cruz. The Pima County Medical examiner also performs medical examination services for five other counties as needed, according to Pima County Medical Examiner's annual report for 2020.

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evaluation plan or agenda for assessing programs, and the Project Management Institute’s project management principles.<sup>11</sup>

We conducted this performance audit from March 2021 to April 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

### Terrain along the Southwest Border

The southwest border spans almost 2,000 miles across four states and comprises widely different types of terrain—a fact that challenges border security efforts. For example, in Arizona, the border is characterized by desert and rugged mountains, and in Texas, it is marked by the Rio Grande River. In California, it is primarily comprised of coastal beaches, inland mountains, rugged canyons, and high desert, whereas in New Mexico the border is mountainous. See figure 1 for more examples of the terrains along the southwest border.

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<sup>11</sup>[GAO-14-704G](#) and GAO, *Foreign Assistance: Selected Agencies’ Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: September 27, 2016). American Evaluation Association, *An Evaluation Roadmap for a More Effective Government* (September 2019). The American Evaluation Association published the roadmap to guide the development and implementation of federal agency evaluation programs and policies. The framework offers a set of general principles intended to facilitate the integration of evaluation activities with program management. Project Management Institute, *A Guide to the Project Management Body of Knowledge (PMBOK® Guide)*, 6th ed. (2017). PMBOK is a trademark of the Project Management Institute, Inc.



**Figure 1: Examples of Terrain along the U.S.-Mexico Border**



Remote and rugged mountainous terrain and border river areas, which include thick vegetation, in Texas



Mountain ranges and valleys along the border in Arizona



Rocky terrain and desert shrub in New Mexico



Hilly terrain with dense vegetation in California

Source: Mosto/stock.adobe.com, M.PartsPhoto/stock.adobe.com, CBP. | GAO-22-105053

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## Border Patrol Responsibilities and the Missing Migrant Program

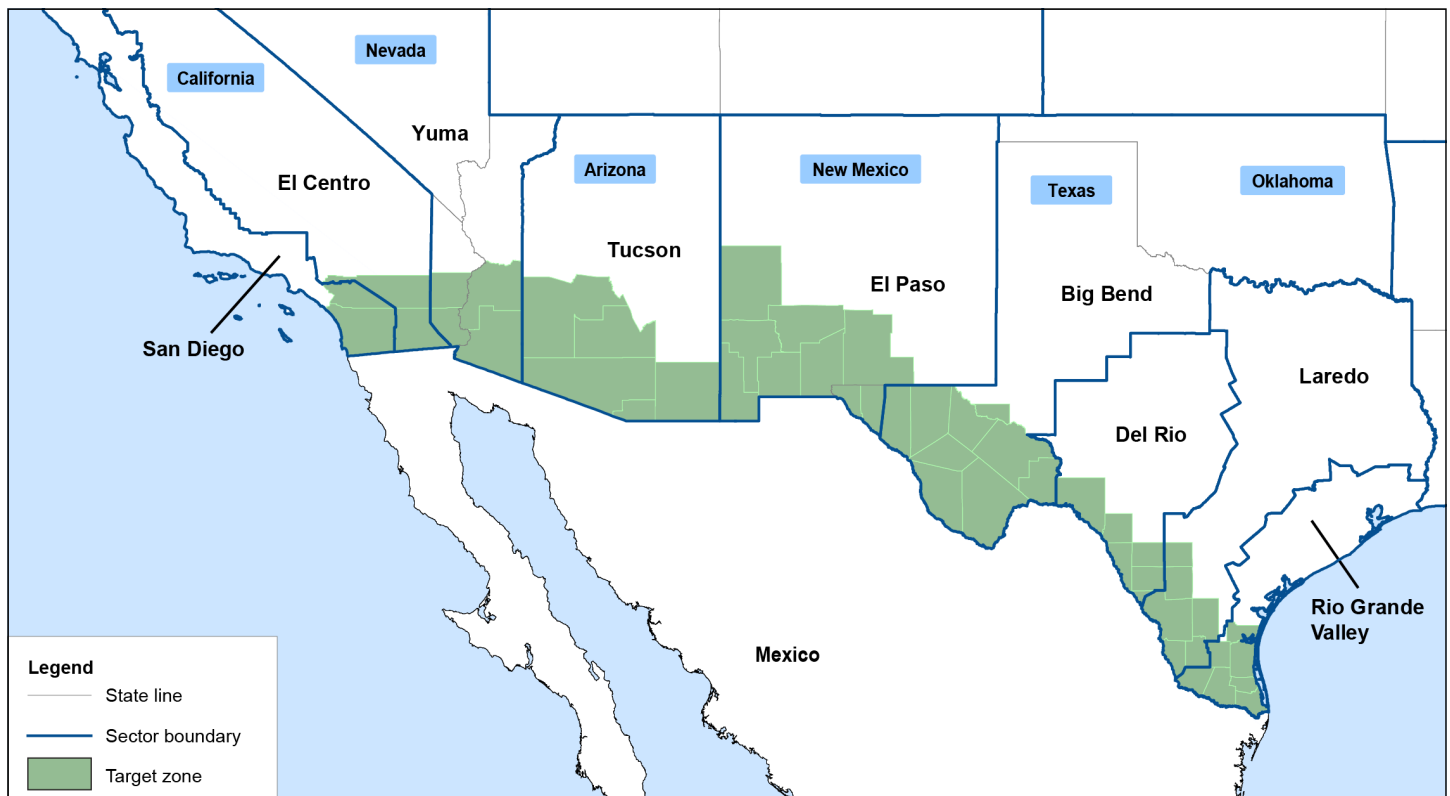
Along the southwest border, some migrants attempting to enter the U.S. illegally have sought to cross the border between ports of entry in remote areas, where they risk injury and death by trying to cross over mountains, deserts, and rivers. These conditions have prompted Border Patrol to warn migrants about the dangers of unlawfully crossing the border and to establish search and rescue units, among other initiatives, to help reduce the number of migrant deaths. For example, in 2015, Border Patrol's Tucson sector started a program to facilitate coordination with external entities and better track reports of missing and deceased migrants. Border Patrol headquarters expanded the program to sectors in South Texas in June 2016 and established the Missing Migrant Program nationally within Border Patrol's Foreign Operations Division in June 2017.<sup>12</sup>

Border Patrol focuses its Missing Migrant Program efforts in its target zone—an area consisting of 45 counties on or near the southwest border with Mexico (see fig. 2).

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<sup>12</sup>The Foreign Operations Division coordinates with local, state, federal, and foreign counterparts to increase border security, with an emphasis on anti-terrorism, immigration, and the facilitation of legitimate trade and travel to include identification and disruption of transnational criminal organizations.

**Figure 2: U.S. Border Patrol Sectors and Target Zone along the U.S.-Mexico Border**



Source: GAO analysis of U.S. Customs and Border Protection information. | GAO-22-105053

Border Patrol uses BSITS as the system of record on migrant deaths. BSITS enables Border Patrol to track the volume and types of rescues performed, and the number of migrant deaths that occur.<sup>13</sup> The BSITS User Manual defines a reportable death as the death of a suspected undocumented migrant who died in furtherance of an illegal entry, within the target zone, whether or not the Border Patrol was directly involved.<sup>14</sup>

<sup>13</sup>Border Patrol is modernizing its enforcement systems by developing the Border Enforcement Coordination Network. According to Border Patrol officials, BSITS will remain the system of record for rescue and deaths until the Border Enforcement Coordination Network is fully implemented.

<sup>14</sup>Office of Border Patrol, *Border Safety Initiative Tracking System (BSITS) User Manual* (Washington, D.C.: 2007).

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The manual also states that deaths outside the target zone should be recorded in BSITS if Border Patrol was directly involved with the incident.

In February 2021, CBP issued *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* to address the congressional directive in the committee report accompanying DHS's fiscal year 2020 appropriation for CBP to submit a report with data on migrant deaths, plans to help reduce the number of migrant deaths, and its coordination efforts with external entities.<sup>15</sup> In the report, CBP stated that known migrant deaths near the U.S.-Mexico border remained relatively stable from fiscal years 2017 through 2019, but that the number of individuals rescued increased. Additionally, CBP described its efforts to place rescue beacons and 9-1-1 placards along the southern border, and improve information flow with and between other federal agencies and external entities.

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## Border Patrol Has Taken Steps to Implement the Missing Migrant Program

Since 2017, Border Patrol has implemented the Missing Migrant Program by (1) issuing an Internal Operating Procedure; (2) coordinating and sharing information with external entities; and (3) undertaking efforts to help reduce the frequency of migrant deaths.

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## Nationwide Internal Operating Procedure Issued

Border Patrol issued the Missing Migrant Program Internal Operating Procedure in September 2021 to help standardize the program across sectors.<sup>16</sup> Prior to its issuance, three southwest border sectors—Rio Grande Valley, Laredo, and Tucson—had issued their own standard operating procedures in 2017.<sup>17</sup> The three individual documents provided guidance for the respective sectors to, among other things, respond to and assist with the identification of migrant decedents. For example, the sector-level procedures describe the process that agents should follow

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<sup>15</sup>Department of Homeland Security, U.S. Customs and Border Protection, *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* (Washington, D.C.: 2021). In addition to the committee report directive, which was for a single report, the Missing Persons and Unidentified Remains Act of 2019 requires CBP to produce an annual report on all unidentified remains discovered, during the reporting period, on or near the border between the U.S. and Mexico. See Missing Persons and Unidentified Remains Act of 2019, Pub. L. No. 116-277, § 5, 134 Stat. 3370, 3371 (2020).

<sup>16</sup>An Internal Operating Procedure serves as national guidance for the Border Patrol.

<sup>17</sup>As of December 2021, CBP officials told us that the sector-level Standard Operating Procedures are current and do not conflict with the Internal Operating Procedure.

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when responding to an inquiry that might lead to a search and rescue operation. While the standard operating procedures provided guidance to the specific sectors, at that time Border Patrol had not yet established nationwide guidance for the Missing Migrant Program.

Border Patrol's nationwide Internal Operating Procedure went into effect on October 1, 2021, and establishes common processes across all nine sectors along the southwest border to, among other things, assign roles and responsibilities to agents working in the Missing Migrant Program and respond to inquiries of missing migrants from external entities. Border Patrol has begun to implement the Internal Operating Procedure by, among other actions, holding weekly meetings with program sector-level coordinators to discuss any concerns and share best practices, according to the Missing Migrant Program National Coordinator.

In addition, while Border Patrol previously coordinated with external entities, the document outlines the sectors' responsibilities for maintaining regular contact and sharing appropriate information with foreign consulates and medical examiners to assist with the identification of migrant remains. Additionally, the Internal Operating Procedure standardizes and provides details about how agents are to track four inquiry categories—(1) requests from consulates about missing migrants; (2) reports of a missing migrant that may lead to a search and rescue operation; (3) reports that substantiate the death of a migrant in furtherance of an illegal entry; and (4) identification of remains.

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### Sectors Coordinate with External Entities to Recover and Identify Migrant Remains

Border Patrol coordinates with external entities to recover and identify migrant remains, even though the primary responsibility for these efforts lies with state and local agencies. For example, officials in the San Diego and Rio Grande Valley sectors told us that if they discover remains, they preserve the scene and turn over control to the investigating authority (e.g., the police). Relatedly, officials from three of the five external entities we met with mentioned that Border Patrol accompanies its staff when decedent remains are found in remote areas. These officials told us that Border Patrol's assistance is helpful because the areas may be dangerous or difficult to access and Border Patrol agents often have familiarity with the land. Border Patrol agents from the Laredo sector also told us that, as needed, they coordinate with Mexican authorities to retrieve remains from the Rio Grande River.

Border Patrol shares information with external entities in order to help identify migrant decedents. Specifically, Border Patrol officials in three of four sectors—Rio Grande Valley, Laredo, Tucson—told us that they

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conduct fingerprint matching. For example, Border Patrol officials in the Rio Grande Valley sector told us that during a severe auto accident in August 2021 involving multiple fatalities of suspected migrants, they fingerprinted decedents to support state law enforcement efforts. Border Patrol agents told us they checked the fingerprints against national biometric databases to see if the migrants had a criminal or immigration history to identify them. Further, Border Patrol officials at the Rio Grande Valley sector told us that they regularly assist in the identification process by examining the personal effects of decedents and extracting data from cell phones. In cases where a migrant decedent has an identity card in their possession, these officials told us that they run the name against their processing and detention databases, and matches, if any, are shared with the appropriate external entity. These officials also told us the Rio Grande Valley that smugglers often move people in groups and, if stopped, group members may be able to provide information to help identify a deceased migrant who had been traveling in the group.

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### Efforts Undertaken to Help Reduce the Frequency of Migrant Deaths

The Missing Migrant Program includes various efforts intended to help reduce the frequency of migrant deaths and help Border Patrol respond to missing migrants or those who may be in distress. These efforts include establishing standard procedures to respond to 9-1-1 calls and other external entity reports of migrants missing or in distress, and, as shown in figure 3, placing rescue beacons and 9-1-1 placards in remote areas. Rescue beacons are towers with sensors that can alert Border Patrol agents that someone needs help once activated by an individual in distress. According to Border Patrol data, as of January 2022, Border Patrol had deployed 165 rescue beacons across the southwest border. The number of rescue beacons it deployed by sector ranges from four in the San Diego sector to 44 in the Rio Grande Valley sector. Border Patrol officials also told us they had strategically placed 9-1-1 placards on accessible land with cell phone coverage to instruct migrants to call for help and assist rescue personnel with locating migrants in distress. Border Patrol told us they had placed 2,518 of these placards across the southwest border as of February 2022.



**Figure 3: Rescue Beacon and 9-1-1 Placard Deployed Along the Southwest Border**



Source: U.S. Border Patrol. | GAO-22-105053



Above: 9-1-1 placards placed across the southwest border intended to instruct migrants to call 9-1-1 for help and assist rescue personnel with locating migrants in distress.

Left: Rescue beacons are towers with sensors that can alert Border Patrol agents that someone needs help.

According to headquarters and sector officials, the individual sectors decide where to place rescue beacons and 9-1-1 placards based on historical patterns of migrant rescues and deaths, among other factors. In June 2021, Border Patrol headquarters developed a model to standardize the process of placing rescue beacons. The Missing Migrant Program National Coordinator told us the objective is to place rescue beacons in

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the locations best suited to prevent migrant deaths based on weighted operational and environmental variables.<sup>18</sup> Border Patrol assigned weights to the variables based on the results of a survey administered to sector officials. As of February 2022, Border Patrol had deployed the model in two of nine southwest border sectors, Rio Grande Valley and Big Bend. The Missing Migrant Program National Coordinator stated that Border Patrol is planning to implement the model across the other seven southwest border sectors.

Rio Grande Valley sector officials said they developed technology tools to manage Missing Migrant Program activities. For example, the sector created a database to track information such as decedent location, identification, and correspondence with external entities. In addition, the sector uses a Geographic Information System that displays the coordinates of the placards, rescue beacons, and civilian assets (e.g., power lines and pipelines) that are identifiable to migrants in distress and displayed on an interactive map.<sup>19</sup> These tools contain the information collected to monitor and expedite rescue resolutions of subjects in distress.

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## Data on Migrant Deaths Are Incomplete

CBP has not collected and recorded, or reported to Congress, complete data on migrant deaths or disclosed limitations with the data it has reported. As previously noted, the House Report accompanying the 2020 Department of Homeland Security Appropriations Bill directed CBP to report on each discovery of migrant remains along the southern border, “whether the discovery was made by CBP personnel or other individuals or organizations.”<sup>20</sup> In addition, the Missing Persons and Unidentified Remains Act of 2019 requires CBP to produce an annual report on all unidentified remains discovered during the reporting period on or near the

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<sup>18</sup>The operational variables, and associated weights are: current traffic patterns (20%); trends for rescued subjects (10%); trends for decedents located (20%); and direction from previous decedent locations (5%). The environmental barriers, and associated weights, are suitable elevation (5%); preferred land cover types (20%); proximity to roads (5%); and low degree of slope (15%).

<sup>19</sup>Geographic Information Systems consist of computer software, hardware, and data used to capture, store, manipulate, analyze, and graphically present a potentially wide array of geospatial data. The primary function of a Geographic Information System is to link multiple sets of geospatial data and display the combined information as maps with different layers of information.

<sup>20</sup>See H.R. Rep. No. 116-180, at 20 (2020 Consolidated Appropriations Act, 2020, Pub. L. No. 116-93, 133 Stat. 2317 (2019)).



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border between the U.S. and Mexico.<sup>21</sup> It also states that to the extent such information is available, CBP should report the total number of deceased people whose unidentified remains were discovered by federal, state, local, or tribal law enforcement officers, military personnel, or medical examiners' offices.

In response to the 2020 House report, CBP issued a report with data on southwest border migrant deaths for fiscal years 2015 through 2019 by sector, type of death, and nationality.<sup>22</sup> Border Patrol officials told us that they pulled all records of migrant deaths from BSITS—the system of record for migrant death information—including discoveries made by external entities, for the data included in the report. However, we found the data were not complete because (1) Border Patrol has not ensured the collection and recording of all available information on migrant deaths in BSITS, and (2) the report did not clearly explain data limitations.

First, Border Patrol has a policy for recording information on migrant deaths in BSITS, but Border Patrol sectors have not entered all available information on migrant deaths into the system consistent with that policy. In particular, Border Patrol is not recording all migrant deaths in instances where an external entity first discovers the remains. The BSITS User Manual states that a death of a suspected undocumented migrant who died in furtherance of an illegal entry within the target zone should be recorded, whether the Border Patrol was directly involved or not.<sup>23</sup> Based on the BSITS User Manual, if Border Patrol was not involved in the initial discovery of remains found within the target zone, it should record the death when known, including the agency or person that initially discovered the remains, in BSITS.

Border Patrol sector officials from the four sectors we contacted told us that they coordinate with external entities—such as medical examiners—when remains are discovered. However, Border Patrol sectors we contacted are not consistently recording the data as required. For example, San Diego sector officials told us that they are in frequent

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<sup>21</sup>Missing Persons and Unidentified Remains Act of 2019, Pub. L. No. 116-277, § 5, 134 Stat. 3370, 3371 (2020). CBP submitted a report on March 29, 2022. See Department of Homeland Security, U.S. Customs and Border Protection, *Rescue Beacons and Unidentified Remains: Fiscal Year 2022 Report to Congress* (Washington, D.C.: 2022).

<sup>22</sup>Department of Homeland Security, U.S. Customs and Border Protection, *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* (Washington, D.C.: 2021).

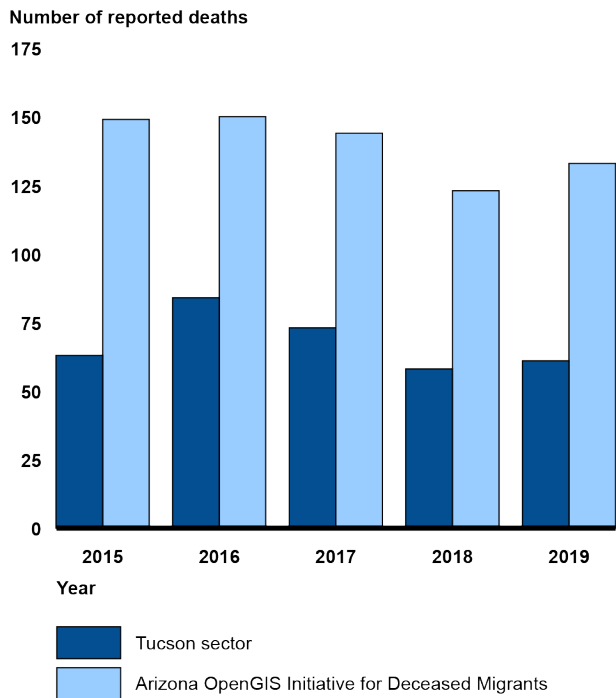
<sup>23</sup>Office of Border Patrol, *Border Safety Initiative Tracking System (BSITS) User Manual* (Washington, D.C.: 2007).

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communication with medical examiners, sheriff's departments, and fire departments. If an entity other than Border Patrol identifies remains, then that external entity notifies the sector officials if they believe that the decedent was likely a migrant crossing the border between ports of entry. In those instances, they record the death in BSITS. However, in the Tucson sector, officials told us that they do not update BSITS after they learn of a migrant death from an external entity, such as the Pima County Medical Examiner. Moreover, they said that they rely on information from the Pima County Medical Examiner for overall situational awareness on migrant deaths rather than data from BSITS.

Figure 4 compares publicly available data from the Arizona OpenGIS Initiative for Deceased Migrants (Initiative), a collaborative effort between the Pima County Medical Examiner's Office and Humane Borders, Inc., with data reported by the Tucson sector in BSITS. It shows that Tucson sector collected and recorded fewer migrant deaths in BSITS than the Initiative each year, from fiscal years 2015 through 2019. While we did not confirm whether all of the migrant deaths reported by the Initiative met the definition of a migrant death to be recorded in BSITS, according to Border Patrol policy, the data indicate that the Initiative recorded more migrant deaths in the target zone counties in Arizona that are within the Tucson sector's area of responsibility than the sector did.

**Figure 4: Comparison of U.S. Border Patrol’s Tucson Sector and Arizona OpenGIS Initiative for Deceased Migrants Reported Migrant Deaths, Fiscal Years 2015-2019**



Source: Analysis of U.S. Border Patrol and Arizona OpenGIS Initiative for Deceased Migrants data. | GAO-22-105053

Note: We did not independently verify the data from the Arizona OpenGIS Initiative for Deceased (Initiative) Migrants against the Border Safety Initiative Tracking System (BSITS) definition of a reportable migrant death. However, we discussed data reliability steps with the Chief Medical Examiner for Pima County, whose data accounted for more than 90 percent of the cases from fiscal years 2015 through 2019 and we determined the data were sufficiently reliable for reporting the number of migrant deaths in the Tucson sector—Cochise, Maricopa, Pima, Pinal, and Santa Cruz counties—identified by the Initiative.

The Missing Migrant Program coordinators at the sector level are responsible for coordinating with external entities to obtain data on migrant deaths they collected, according to Border Patrol guidance. However, they do not enter the data into BSITS. Rather, personnel from the operations centers and stations in the sectors, instead of each sector’s Missing Migrant Program coordinators, are responsible for entering information into BSITS. This can affect the completeness of data on migrant deaths they enter into BSITS because, for example, according to Tucson program officials, the agents in the operations center were not always notified when external information on migrant deaths became available. Additionally, Tucson sector officials told us that there had been confusion as to the definitions of deaths and rescues, and that because of

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supervisor turnover, not all Border Patrol supervisors are familiar with BSITS. As a result of these data entry and recording issues, Border Patrol's data on migrant deaths in its *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* did not reflect all deaths that occurred along the southwest border, particularly those discovered by entities other than Border Patrol.

The Missing Migrant Program National Coordinator stated that the recently issued Internal Operating Procedure is intended to help the program produce data on migrant deaths that are more complete. According to the National Coordinator, prior to the implementation of the Internal Operating Procedure, there was a lack of standardization in reporting and inconsistent coordination with external entities, leading to varying levels of situational awareness. Under the Internal Operating Procedure, the sector Missing Migrant Program coordinators' responsibilities include ensuring that:

- Deaths that occur in their respective sectors are properly documented in BSITS;
- Event entries in the sector are reviewed on a daily basis; and
- Incomplete or inaccurate event entries are referred to the appropriate station or operations center for corrective action.

In addition, according to the Internal Operating Procedure, Missing Migrant Program sector officials are responsible for reviewing BSITS event entries on a daily, sector-level basis for completeness and accuracy. The Missing Migrant Program National Coordinator also told us that the sector-level program coordinators plan to continue to coordinate with external entities to obtain information on migrant deaths.<sup>24</sup>

The Internal Operating Procedure is a positive step for standardizing sectors' activities and procedures. However, it is too early to tell if it will improve the completeness of Border Patrol's data on migrant deaths, and does not fully position Border Patrol to ensure that all available information on migrant deaths are recorded in BSITS. For example, while the Internal Operating Procedure specifies the roles and responsibilities of sector coordinators for ensuring that migrant deaths in their sectors are properly recorded, we identified challenges in the Tucson sector's data

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<sup>24</sup>The Missing Migrant Program Internal Operating Procedure states that program coordinators should maintain regular contact and share appropriate rescue and decedent information with foreign consulates, medical examiners, coroners, academia, sector intelligence units, and domestic and international law enforcement agencies.

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entry practices, as previously described. The Missing Migrant Program National Coordinator stated that he reviews data entries from all sectors on a regular basis to identify and correct any data issues. However, this process does not ensure reports of migrant deaths from external entities are recorded in BSITS because, according to the National Coordinator, the sector coordinators, rather than the National Coordinator, collaborate with and receive information from external entities. As a result, the National Coordinator is not in a position to identify missing reports of migrant deaths during reviews. Moreover, the Internal Operating Procedure lacks guidance that is needed to ensure the complete and accurate information on migrant deaths into BSITS—namely the definition of a reportable death and Border Patrol’s policy that external entity reports of migrant deaths should be entered into BSITS. Rather, Border Patrol agents would need to consult the BSITS handbook to obtain guidance on the reporting requirements and the definition of a death.

Second, the *Migrant Death Mitigation: Fiscal Year 2020 Report to Congress* did not contain data limitation disclosures, including that the data did not include all deaths that occurred along the southwest border during the reporting period, such as deaths identified by external entities. Further, the language in the report makes it unclear what the data include. In particular, the report stated that “CBP records all migrant deaths located by CBP agents,” implying that the report included only the migrant deaths located by CBP agents.<sup>25</sup> As a result, those reading the report may assume that it only includes data on migrant deaths located by Border Patrol agents. However, the Missing Migrant Program National Coordinator said the report included all data on migrant deaths in BSITS, which would include any recorded reports from external entities.

DHS Directive 139-02 on Information Quality states that DHS is to ensure and maximize the quality, objectivity, utility, and integrity of the information that it disseminates to the public.<sup>26</sup> In addition, an instruction implementing the directive states that where appropriate, data should have full, accurate, and transparent documentation, and should identify

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<sup>25</sup>As previously described, within CBP, Border Patrol responds to reports of migrants seeking to enter the U.S. between ports of entry who may be missing or in distress.

<sup>26</sup>Department of Homeland Security, Information Quality, Directive 139-02 (Nov. 21, 2019).

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and disclose error sources affecting data quality.<sup>27</sup> Further, Standards for Internal Control in the Federal Government state that management should use quality information to achieve an agency's objectives and should internally and externally communicate the necessary quality information to achieve the agency's objectives.<sup>28</sup> According to these standards, management should evaluate the reliability of sources of data so that the data can be processed into quality information that is appropriate, current, complete, accurate, accessible, and provided on a timely basis. The quality information can then be used by agency management and external stakeholders, such as policymakers, to make informed decisions.

Taking steps to ensure that Border Patrol collects and records available information on migrant deaths would better position the agency to report complete and accurate data to Congress, consistent with congressional direction. Such steps could include – at the headquarters level – documenting and sharing promising practices across sectors for developing and maintaining collaborative relationships with external entities, and issuing additional guidance or providing training to ensure, for example, BSITS users understand the definition of a reportable death. At the sector level, such steps could include developing and documenting an internal control process for recording external entity reports of migrant deaths that clarifies reporting lines between Missing Migrant Program officials and the sectors' respective stations and operations centers. Further, when reporting on migrant deaths, Border Patrol would improve the information it provides by ensuring it includes all known migrant deaths, including those discovered by external entities, in the data. Identifying and disclosing any known limitations to these data in its congressional and public agency reports would also help provide Congress, policymakers, and the public with contextual information to inform their understanding of migrant deaths occurring along the southwest border.

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<sup>27</sup>Department of Homeland Security, Information Quality Implementation, Instruction, 139-02-001 (November 27, 2019).

<sup>28</sup>[GAO-14-704G](#).

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## Border Patrol Does Not Have a Plan to Evaluate the Missing Migrant Program

Border Patrol collects and reviews information about Missing Migrant Program activities; however, it does not have a plan to evaluate the program overall. Border Patrol sector officials from the four sectors we met with told us that they reviewed their own sectors' data to assess the program as needed. For example, officials from these four sectors stated that they assess whether or not they should add or move rescue beacons in particular areas, based on data recorded on the location of migrant deaths, as previously described. Headquarters program officials said they suggest that the sectors assess the placement of rescue beacons twice annually; however, this is not a documented requirement.

Border Patrol is in the process of implementing the nationwide Internal Operating Procedure it issued in October 2021. This nationwide guidance may help provide oversight at the sector level by standardizing how sectors track their missing migrant program activities. According to the Internal Operating Procedure, each sector is to submit a weekly report to headquarters that describes major activities, developments, and initiatives in its area of responsibility. For example, they are to include:

- Weekly and year-to-date statistics on external entity requests for information on missing migrants, searches and rescues, searches and recoveries, and identifications of remains;
- Rescue beacon and 9-1-1 rescue placard activations and dispositions; and
- Coordination efforts with external entities.

Border Patrol officials told us that they do not have a plan to evaluate the Missing Migrant Program but stated that they monitor the program through these weekly reports. Specifically, the Missing Migrant Program National Coordinator stated that he reviews weekly reports and provides guidance to better allocate resources. In fiscal year 2022, the Missing Migrant Program implemented a standardized web-based form for sectors to complete their weekly reports, which may help management assess performance across sectors, and according to the National Coordinator, will help Border Patrol meet congressional reporting requirements.

These weekly reports are positive steps to help Border Patrol monitor sectors' implementation of the Missing Migrant Program. They serve as an opportunity to highlight the accomplishments of the program with relevant linkages to the current and future CBP strategic plans, according to the Internal Operating Procedure. However, the weekly reports do not constitute an evaluation of the program and its progress toward meeting

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its programmatic goals. Moreover, Border Patrol does not currently have a plan to aggregate or use the information from the weekly reports to evaluate the program across sectors. For example, the Internal Operating Procedure notes that a goal of the Missing Migrant Program is to integrate partnerships with national and foreign entities. While the weekly reports are to include information on coordination with external entities, the Internal Operating Procedure does not specify how Border Patrol will use the information in the weekly reports to assess its progress toward meeting this program goal.

Moreover, the Internal Operating Procedure states that the National Missing Migrant Program National Coordinator is responsible for consolidating sector statistical information and significant Missing Migrant Program engagements with foreign nationals and reporting this to Border Patrol leadership. Additionally, the National Coordinator is to provide continuous evaluation of collaborative efforts of humanitarian objectives and information sharing with foreign law enforcement entities in accordance with CBP international policies. However, the Internal Operating Procedure does not provide a plan for how the National Coordinator will conduct these evaluations or what they will include.

Standards for Internal Control in the Federal Government state that management should use quality information to achieve the entity's objectives, and should establish and operate activities to monitor the internal control system and evaluate the results.<sup>29</sup> Further, we developed a list of leading practices for evaluation based on the American Evaluation Association's *An Evaluation Roadmap for a More Effective Government*.<sup>30</sup> The first leading practice involves the development of an evaluation plan or agenda. Additionally, when beginning a project, such

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<sup>29</sup>[GAO-14-704G](#). Internal control involves the plans, methods, policies, and procedures that an entity uses to fulfill its mission.

<sup>30</sup>GAO, *Foreign Assistance: Selected Agencies' Monitoring and Evaluation Policies Generally Address Leading Practices*, [GAO-16-861R](#) (Washington, D.C.: September 27, 2016), and American Evaluation Association, *An Evaluation Roadmap for a More Effective Government* (September 2019). The American Evaluation Association published the roadmap to guide the development and implementation of federal agency evaluation programs and policies. The framework offers a set of general principles intended to facilitate the integration of evaluation activities with program management.



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as a program evaluation, project management principles call for the development of a plan that defines the time associated with the project.<sup>31</sup>

In March 2021, we produced a guide on key terms and concepts in program evaluation.<sup>32</sup> Based on this guide, an evaluation of the Missing Migrant Program could look at the extent to which the program is being implemented as intended, producing expected outputs, or be improved. It could also include a needs assessment, or an evaluation designed to understand the resources required for a program to achieve its goals. It could also include an outcome evaluation, which assesses the extent to which the program has achieved certain objectives, and how the program achieved these objectives.

Border Patrol would benefit from a more robust assessment of the impacts of its various efforts under the Missing Migrant Program on reducing the frequency of migrant deaths and strengthening Border Patrol's efforts to respond to migrants in distress. By developing a plan with time frames to evaluate the Missing Migrant Program, Border Patrol would be in a better position to assess its progress in meeting the program's goals, track its contributions towards CBP's larger strategic goals, and consider the extent to which program changes may be needed.

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## Conclusions

Migrants attempting to enter the U.S. illegally along the southwest border risk injury or death by crossing in remote areas. Border Patrol has taken positive steps to help mitigate migrant deaths by implementing the Missing Migrant Program in all sectors along the southwest border, including by issuing national guidance in September 2021. However, it is too soon to know the effects of this guidance on the Missing Migrant Program.

Border Patrol's most recent report to Congress did not include all known migrant deaths because Border Patrol sectors have not recorded all available reports of migrant deaths from external entities. Ensuring that Border Patrol collects and records available information on migrant deaths reported by external entities would better position the agency to report complete data to Congress. Further, identifying and disclosing any known limitations to these data in its congressional and public reports

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<sup>31</sup>Project Management Institute, *A Guide to the Project Management Body of Knowledge*.

<sup>32</sup>GAO, *Program Evaluation: Key Terms and Concepts*, [GAO-21-404SP](#) (Washington, D.C.: March 22, 2021).

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would also help provide Congress, policymakers, and the public with contextual information to inform their understanding of the frequency of migrant deaths occurring along the southwest border.

Border Patrol has also taken steps to standardize the weekly reports it collects on sectors' Missing Migrant Program efforts but these reports do not constitute an evaluation of the program and its progress toward meeting its programmatic goals. Developing a plan with time frames to evaluate the Missing Migrant Program would help Border Patrol evaluate how its efforts to reduce migrant deaths contribute to CBP's strategic goals.

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## Recommendations for Executive Action

We are making the following three recommendations to Border Patrol:

The Chief of Border Patrol should take steps to ensure that the agency collects and records available information on migrant deaths, including those identified by external entities, along the southwest border. (Recommendation 1)

The Chief of Border Patrol should include known migrant deaths, including those reported by external entities, and any data limitations in public agency reports and those to Congress. (Recommendation 2)

The Chief of Border Patrol should develop a plan with time frames to evaluate the Missing Migrant Program. (Recommendation 3)

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## Agency Comments and Our Evaluation

We provided a draft of this report to DHS for review and comment. DHS provided comments, which are reproduced in full in appendix I and discussed below. In its comments, DHS concurred with our three recommendations and described actions planned to address them.

In response to our first recommendation that the Chief of Border Patrol take steps to ensure that the agency collects and records available information on migrant deaths, DHS stated that the Missing Migrant Program plans to record any additional information on reported migrant deaths, including from medical examiners and coroners, as applicable.

With regard to our second recommendation that the Chief of Border Patrol include known migrant deaths and any data limitations in public agency reports and those to Congress, DHS stated that the Missing Migrant Program plans to record additional information on reported migrant deaths obtained from external entities, as appropriate, and note any data limitations in its report.

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With regard to our third recommendation that the Chief of Border Patrol develop a plan with time frames to evaluate the Missing Migrant Program, DHS stated that Border Patrol plans to evaluate the program annually and that this evaluation will include reporting procedures and data integrity, among other efforts. Further, DHS stated that the Missing Migrant Program National Coordinator plans to develop an annual plan, establish program goals and timeframes, and issue an after-action report.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of Homeland Security. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-8777 or [gablerr@gao.gov](mailto:gablerr@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix II.



Rebecca Gambler  
Director, Homeland Security and Justice

# Appendix I: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

April 4, 2022

Rebecca Gambler  
Director, Homeland Security and Justice  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Management Response to Draft Report GAO-22-105053, "SOUTHWEST BORDER: CBP Should Improve Data Collection, Reporting, and Evaluation for the Missing Migrant Program"

Dear Ms. Gambler:

Thank you for the opportunity to comment on this draft report. The U.S. Department of Homeland Security (DHS or Department) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's recognition that U.S. Customs and Border Protection (CBP) U.S. Border Patrol (USBP) implemented the Missing Migrant Program (MMP) in 2017 to help rescue migrants in distress and reduce migrant deaths along the southwest border. In addition, we noted that the draft report recognizes that USBP: (1) issued nationwide procedures; (2) coordinated with external entities, to include state and local officials; and (3) undertook efforts to reduce the frequency of migrant deaths, such as responding to migrants in distress, and placing rescue beacons and emergency placards in remote areas known to be travelled by migrants. DHS remains committed to utilizing the MMP to enhance border safety through the rescue of migrants in distress, the mitigation of migrant deaths, and the identification and reunification of decedents located in the border region.

However, it is important to also note more recent activities taken to enhance MMP's dedication of personnel and resources to provide humanitarian aid to migrants in distress. For example, within the past year, USBP created and filled the MMP National Coordinator position. The National Coordinator initiated weekly meetings with the nine Southwest Border (SWB) sector representatives of the MMP to discuss reporting requirements, challenges, best practices, lessons learned, and external engagements.

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**Appendix I: Comments from the Department of  
Homeland Security**

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Further, CBP implemented the MMP Internal Operating Procedure on October 1, 2021, and created a weekly, web-based report for the MMP National Coordinator and the SWB sector representatives, which tracks associated congressional reporting requirements and other evaluative metrics, such as engagements with medical examiners and coroners, institutions of higher education, non-governmental organizations, and the deployment posture of rescue beacons.

CBP also continues to produce an annual report to Congress regarding Rescue Beacons and Unidentified Remains, pursuant to the Missing Persons and Unidentified Remains Act of 2019, which highlights CBP's efforts to prevent the loss of lives of migrants attempting to enter the United States. Once publicly released, the most recent version of this report will illustrate data trends regarding recorded migrant rescues and deaths along the southwest border, as well as details on MMP efforts.

Further, USBP plans to use annual MMP Coordinator Summits to conduct training and program evaluation, as well as engage with industry representatives to identify, and develop programs of, emerging technologies which may enhance the MMP effectiveness. MMP will also bolster collaboration with external law enforcement and public safety partners through stakeholder engagements and data de-confliction to increase situational awareness of border safety incidents leading to advanced reporting capabilities and identifying information limitations.

The draft report contained three recommendations with which the Department concurs. Attached please find our detailed response to each recommendation. DHS previously submitted technical comments addressing issues under a separate cover for GAO's consideration.

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

Sincerely,

JIM H  
CRUMPACKER

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JIM H. CRUMPACKER, CIA, CFE  
Director  
Departmental GAO-OIG Liaison Office

Attachment

**Attachment: Management Response to Recommendations  
Contained in GAO-22-105053**

GAO recommended that the USBP Chief:

**Recommendation 1:** Take steps to ensure that the agency collects and records available information on migrant deaths, including those identified by external entities, along the southwest border.

**Response:** Concur. The USBP MMP currently collects, and records, evaluated information from the SWB sectors in the web-based MMP Weekly Report, which follows the congressional reporting requirements pursuant to the Missing Persons and Unidentified Remains Act of 2019. In coordination with external partners, as appropriate, USBP sector MMP coordinators will also record any additional information on reported migrant deaths along the SWB that can be included in the Border Safety Initiative Tracking System (BSITS). This will include information from such sources as the National Missing and Unidentified Persons System and local county Medical Examiner's or Coroner's Office. Estimated Completion Date (ECD): September 30, 2022.

**Recommendation 2:** Include known migrant deaths, including those reported by external entities, and any data limitations in public agency reports and those to Congress.

**Response:** Concur. As the USBP MMP currently reports all known migrant deaths into BSITS, according to its reporting requirements, USBP sector MMP coordinators will record additional information on reported migrant deaths along the SWB from external partners within BSITS, as appropriate, while also noting any data limitations in the report. ECD: September 30, 2022.

**Recommendation 3:** Develop a plan with timeframes to evaluate the Missing Migrant Program.

**Response:** Concur. The USBP will evaluate the MMP annually during its MMP Coordinator Summit, in which USBP will evaluate the external engagements, reporting procedures, data integrity, BSITS review, Rescue Beacon placement, and other MMP goals, as appropriate. The MMP National Coordinator will also: (1) create an annual plan which will include an annual agenda; (2) establish program goals and timeframes to be discussed with the MMP coordination representatives of the nine SWB sectors; and (3) issue an After-Action Report to summarize the findings. ECD: December 31, 2022.

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# Appendix II: GAO Contact and Staff Acknowledgments

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## GAO Contact

Rebecca Gambler at (202) 512-8777 or [gablerr@gao.gov](mailto:gablerr@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, E. Jeanette Henriquez (Assistant Director), R. Gifford Howland (Analyst-in-Charge), Hannah Weigle, and Emilie Weisser made key contributions to this report. Benjamin Crossley, Michele Fejfar, Heidi Nielson, and Adam Vogt also provided substantial assistance.

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