



Office of Audits
Office of Inspector General
U.S. General Services Administration

GSA Should Monitor and Track Facility Security Assessments

Report Number A160101/O/7/F18002
December 4, 2017

Executive Summary

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Why We Performed This Audit

We performed an audit of GSA's receipt and use of facility security assessment reports developed by the Department of Homeland Security's Federal Protective Service (FPS). The audit was performed based on GSA Office of Mission Assurance's (OMA) concerns about the lack of facility security assessments conducted on GSA buildings.

Furthermore, in fiscal years 2016 and 2017, we identified safeguarding federal infrastructure as one of GSA's major management challenges.¹ Our objectives were to determine: (1) whether GSA received facility security assessment reports from FPS; (2) how GSA monitored and used reports received; and (3) the effect if GSA did not receive the facility security assessment reports.

What We Found

GSA should be using facility security assessment reports to ensure the protection of its buildings and its tenants. According to OMA and GSA's Public Buildings Service (PBS) management officials, PBS property managers should receive facility security assessment reports from FPS and review the reports to identify countermeasures and issues that can be corrected. However, we found that GSA did not have the facility security assessment reports for most of the buildings we sampled.

What We Recommend

We recommend that the GSA Acting Administrator:

1. Implement policies and procedures to:
 - a. Monitor and track facility security assessment reports. This should include developing an automated methodology to track whether PBS received the facility security assessment reports.
 - b. Require that PBS and OMA officials follow up with FPS when reports are not received.
2. Require training for PBS property managers on the use of facility security assessment reports.

In its response, GSA concurred with our recommendations. GSA's comments are included in their entirety in ***Appendix B***.

¹ *The Office of Inspector General's Assessment of GSA's Major Management Challenges* (October 2015 and October 2016).

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Introduction

We performed an audit of GSA's receipt and use of facility security assessment reports developed by the Department of Homeland Security's (DHS's) Federal Protective Service (FPS).

Purpose

We performed this audit in response to concerns expressed by the GSA Office of Mission Assurance (OMA). Also, in fiscal years 2016 and 2017, we identified safeguarding federal infrastructure as one of GSA's major management challenges.²

Objectives

Our objectives were to determine: (1) whether GSA received facility security assessment reports from FPS; (2) how GSA monitored and used reports received; and (3) the effect if GSA did not receive the facility security assessment reports.

See **Appendix A** – Scope and Methodology for additional details.

Background

GSA and DHS Roles and Responsibilities

GSA and DHS share responsibility for protecting federal buildings. GSA is the landlord for the civilian federal government. In this role, GSA acquires space on behalf of federal agencies and is responsible for operations, maintenance, and protection of federal buildings and grounds under the custody and control of the GSA Administrator. Prior to November 2002, FPS was a division within GSA's Public Buildings Service (PBS), responsible for GSA's physical security and law enforcement missions. FPS's responsibilities included performing physical security surveys to assess the risks, threats, and vulnerabilities at GSA buildings.

In November 2002, the Homeland Security Act transferred FPS to DHS, making DHS responsible for protecting GSA's owned and leased buildings. Under DHS, FPS's responsibilities include: (1) protecting federal employees and visitors in over 9,000 federal properties; (2) enforcing laws, building rules, and regulations; and (3) investigating crimes.

Executive Order 12977 established the Interagency Security Committee (ISC) to evaluate security standards and establish policies for security in federal buildings.³ In February 2003, this order was amended by Executive Order 13286 to name DHS as the

² *The Office of Inspector General's Assessment of GSA's Major Management Challenges* (October 2015 and October 2016).

³ The President signed Executive Order 12977 on October 19, 1995.

head of the ISC. According to *The Risk Management Process for Federal Facilities*, a standard issued by the ISC, FPS is responsible for identifying and analyzing security risks including threats, vulnerabilities, and potential consequences; and recommending appropriate countermeasures for GSA-owned and leased buildings.

After the transfer of FPS to DHS, GSA retained some protection authorities. GSA protection responsibilities include installing building-related fixtures such as fencing, lighting, vehicular barriers, guard booths, blast resistant windows, and door locks. GSA is also responsible for coordinating with FPS to ensure tenants' security. *Figure 1* illustrates GSA's and DHS's building security roles and responsibilities.

Figure 1 – GSA's and DHS's Building Security Responsibilities

Agency	Security Responsibilities
GSA	<ul style="list-style-type: none"> • Facility maintenance – Conduct any repairs or alterations that affect operation of building security equipment. • Space and services – Provide space and building services to FPS. • Security fixtures – Provide physical security measures that are part of the building including physical access control systems, vehicle barriers, bollards, and guard booths. • Equipment storage space – Provide space for FPS communication equipment.
DHS	<ul style="list-style-type: none"> • Security equipment – Install, maintain, and repair items that are not part of the building and easily removable, including x-ray machines, closed circuit television, and intrusion alarms. • Protective security officers – Coordinate all contract guard services. These officers control access to the facility, monitor security equipment, and check employee and visitor identification. • Alarm monitoring/notification – Monitor security systems, dispatch officers, maintain emergency contact lists. • Law enforcement activities – Enforce federal laws and regulations, issue traffic tickets, conduct investigations, respond to emergencies. • Facility security assessments – Evaluate vulnerabilities and threats to all existing buildings to ensure compliance with the designated security level and recommend any mitigation strategies.
GSA and DHS	<ul style="list-style-type: none"> • Committees – Both agencies assign an advisory member to the Facility Security Committee. DHS provides technical expertise. • Identification credentials – Both agencies follow Homeland Security Presidential Directive 12 for issuing credentials.⁴ • Building Access – Both agencies work together to develop building entry and exit procedures for employees, visitors, and contractors. • Occupant emergency plan – DHS provides technical guidance and training. GSA coordinates fire evacuation training drills.

⁴ In August 2004, the President issued Homeland Security Presidential Directive 12. This directive ordered the establishment of a mandatory, government-wide standard for secure and reliable forms of identification for federal government employees and contractor personnel who access government-controlled facilities and information systems.

Additional Requirements and Guidance

GSA, DHS, and the ISC established additional requirements and guidance to outline GSA's and FPS's security responsibilities after FPS was transferred to DHS. In addition, the ISC provided updated criteria for facility security assessments.

Memorandum of Agreement. In June 2006, PBS and DHS signed a Memorandum of Agreement (MOA) outlining the responsibilities of each organization with regard to building security. According to the MOA, FPS is required to conduct facility security assessments of GSA buildings in accordance with ISC standards. The resulting facility security assessment report should include recommended countermeasures for identified vulnerabilities. The MOA also established that both organizations are responsible for the implementation of approved countermeasures, with FPS responsible for security equipment and GSA in charge of building security fixtures.

In addition, the MOA required FPS to provide facility security assessment executive summaries to PBS property managers and each building's Facility Security Committee chairperson. However, according to PBS and OMA management officials, FPS no longer prepares executive summaries and now provides PBS property managers the complete facility security assessment reports. This 2006 MOA is outdated and has been under revision since 2008.

Presidential Policy Directive 21. In February 2013, Presidential Policy Directive 21, *Critical Infrastructure Security and Resilience*, required the Secretary of Homeland Security to conduct comprehensive assessments of the vulnerabilities of the nation's critical infrastructure. This directive also designated both GSA and DHS as the responsible agencies for providing institutional knowledge and specialized expertise in support of security programs and activities for government buildings.

ISC Standard. In August 2013, the ISC issued *The Risk Management Process for Federal Facilities*, a standard to define the criteria and processes to determine the building security level and provide a single source of physical security countermeasures for federal buildings. The ISC updated the standard in November 2016.

Facility Security Committee. According to the ISC standard, buildings with two or more federal tenants should have a Facility Security Committee (Security Committee). Security Committees are responsible for addressing building-specific security issues and approving the implementation of recommended countermeasures and practices. Security Committees include representatives of all federal tenants in the buildings, as well as FPS and GSA. However, FPS and GSA do not have voting rights unless they are tenants in the building. If the Security Committee approves a countermeasure, each federal tenant in the building is responsible for funding its prorated share of the cost. According to the ISC standard, in buildings with one federal tenant, the tenant is the decision-maker for the building's security. Therefore, these buildings do not have Security Committees.

Facility Security Assessments and Security Levels. The ISC standard requires FPS to conduct facility security assessments to identify vulnerabilities and recommend countermeasures. Security Committees use a building’s facility security assessment report to: (1) evaluate security risk, (2) implement countermeasures to mitigate risk, and (3) allocate security resources effectively. For example, a facility security assessment report might include a recommendation to install cameras and relocate a loading dock. Upon deliberation, a Security Committee might decide only to install the cameras.

FPS, in consultation with the Security Committee, assigns a building’s security level, which determines the required protection level. Security levels range from Level 1 (lowest risk) to Level 5 (highest risk) and dictate the frequency of the facility security assessments for that building (see *Figure 2.*)

Figure 2 – Facility Security Assessment Frequency

Security Level	Facility Security Assessment Frequency	Examples of Buildings
Levels 1 and 2 – Minimum to Low Risk	Every 5 Years	Agency field offices or small offices in leased commercial space
Levels 3, 4, and 5 – Medium to Very High Risk	Every 3 Years	Agency headquarters or U.S. courthouses

The security level is based on five factors: mission criticality, symbolism, building population, building size, and threat to tenant agencies. In addition, intangibles (such as a short duration occupancy) can be used to adjust the security level.

Results

GSA should be using facility security assessment reports to ensure the protection of its buildings and its tenants. According to OMA and PBS management officials, PBS property managers should receive facility security assessment reports from FPS and review the reports to identify countermeasures and issues that can be corrected. However, we found that GSA did not have the facility security assessment reports for most of the buildings we sampled.

Finding – To fulfill its building protection responsibilities, GSA should ensure that it receives and uses facility security assessment reports.

During our audit, we selected a sample of 45 buildings from the active building inventories in Regions 2, 4, and 7 (see **Appendix A** for additional information on our sample selection) and requested the facility security assessment reports from the PBS property managers. Of the 45 buildings in our sample, PBS property managers could only provide the facility security assessment reports for 11 buildings. The PBS property managers did not have the facility security assessment reports for the remaining 34 buildings in our sample (76 percent). According to the PBS property managers, they did not receive the reports from FPS; and not all the property managers followed up with FPS to obtain the reports.

During our audit, most of the missing reports were eventually obtained. OMA regional officials, PBS property managers, and the audit team requested the 34 facility security assessment reports from DHS or the building's designated official.⁵ DHS provided 29 reports and the designated official provided 1. The remaining four reports could not be accounted for.

Had PBS property managers obtained and reviewed the facility security assessment reports, they would have been aware of the recommended countermeasures. Below are a few examples of these recommended countermeasures:

- Install: (1) closed circuit video and intrusion detection systems, (2) vehicle barriers, (3) additional lighting around perimeter of building, and (4) signage around building; and reconfigure air intakes. [Region 2]
- Develop a building security plan, install blast resistant windows, provide security awareness training, setup closed circuit video system maintenance plan and schedule, and secure doors leading to employee office space. [Region 4]
- Install card readers at emergency exits and elevators, upgrade metal detectors, install window protection, and repair/replace damaged fence posts and façade. [Region 7]

⁵ For one building, GSA was the only tenant and the PBS Deputy Regional Commissioner was the building's designated official for facility security assessments. Therefore, he had a copy of the facility security assessment report.

Because PBS officials did not receive facility security assessment reports, PBS property managers were not aware of the building security vulnerabilities and the recommended countermeasures. They therefore lacked basic information needed to fulfill their responsibilities to engage with Security Committees on building security needs and implement approved countermeasures. This potentially puts the security of GSA buildings and tenants at risk.

OMA and PBS management officials acknowledged that GSA does not have policies or procedures to ensure receipt of facility security assessment reports and require follow-up action with FPS when reports are not received. In addition, OMA management officials acknowledged that GSA needs a system to track facility security assessments.

Subsequent to our audit fieldwork, on June 13, 2017, GSA issued GSA Order OMA 1000.3, *Responsibilities for Implementation of Facility Security Assessment Countermeasures*. This order defines PBS's and OMA's responsibilities regarding the use of facility security assessment reports and the implementation of countermeasures.

Specifically, the order requires PBS to:

- Review the facility security assessment report for operational impacts and recommended countermeasures;
- Meet with OMA and FPS; and
- Attend Security Committee meetings.

The order also requires OMA to:

- Review the facility security assessment report to coordinate with PBS and FPS on the implementation of recommended countermeasures;
- Attend Security Committee meetings;
- Act as a liaison between PBS and FPS for countermeasures and security level-related discussions; and
- Document recommended countermeasures not approved by the Security Committee.

The new policy clarifies the responsibilities of both OMA and PBS with regard to reviewing facility security assessment reports and implementing the recommended countermeasures. However, GSA still must take additional steps to monitor and track the receipt of the reports and ensure that GSA staff receive training on their responsibilities.

Conclusion

GSA should be using facility security assessment reports to ensure the protection of its buildings and its tenants. According to OMA and PBS management officials, PBS property managers should receive facility security assessment reports from FPS and review the reports to identify countermeasures and issues that can be corrected. However, we found that GSA did not have the facility security assessment reports for most of the buildings we sampled. Accordingly, GSA needs to take steps to track facility assessment reports and to ensure staff understand their responsibilities regarding the use of the reports and the implementation of countermeasures.

Recommendations

We recommend the GSA Acting Administrator:

1. Implement policies and procedures to:
 - a. Monitor and track facility security assessment reports. This should include developing an automated methodology to track whether PBS received the facility security assessment reports.
 - b. Require that PBS and OMA officials follow up with FPS when reports are not received.
2. Require training for PBS property managers on the use of facility security assessment reports.

GSA Comments

In its response, GSA concurred with our recommendations. GSA's comments are included in their entirety in **Appendix B**.

Audit Team

This audit was managed by the Greater Southwest Region Audit Office and conducted by the individuals listed below:

Paula Denman	Regional Inspector General for Auditing
Grace McIver	Audit Manager
Hector Molina-Rodriguez	Auditor-In-Charge
Melissa Leediker	Auditor
Enderick Lewis	Auditor
Keith Migneault	Auditor

Appendix A – Scope and Methodology

Our audit scope consisted of a judgmental sample of 45 active GSA buildings in Regions 2, 4, and 7. To select our sample of buildings, we requested PBS provide the inventory of all GSA-owned and leased properties as of July 15, 2016. PBS officials provided an inventory of 9,259 properties. The inventory included three types of properties: buildings, structures, and land. We limited our scope to buildings because properties classified as structures and land generally do not have tenants.⁶

The inventory also included active, decommissioned, and excess buildings.⁷ Focusing on active buildings, we judgmentally selected three regions. We selected Regions 4 and 7 because they are the two regions with the most active buildings. We selected Region 2 because OMA management officials stated that obtaining facility security assessment reports for Region 2 buildings was challenging. See *Figure 3* for the distribution of the active buildings.

Figure 3 – Active Buildings in the Universe

Region	Number Buildings	Percentage of Total
1	410	5%
2	478	6%
3	772	9%
4	1,410	16%
5	991	11%
6	384	4%
7	1,187	14%
8	622	7%
9	1,065	12%
10	506	6%
11	887	10%
Total	8,712	100%

Note: Shaded rows indicate the regions included in our scope.

After selecting Regions 2, 4, and 7, we limited the scope to buildings with security levels 2, 3, and 4. We did not include security levels 1 and 5 because level 1 buildings are smaller sized buildings with a low risk level, and level 5 buildings have very high security and a high probability of facility security assessments being conducted and discussed at Security Committee meetings.

⁶ A parking garage is an example of a structure.

⁷ According to PBS officials, decommissioned buildings are buildings that will be demolished and excess buildings are buildings that GSA is trying to sell or donate.

From the three regions, we selected a total of 45 sample buildings based on the following:

- Number of buildings at security level 2, 3, and 4;
- Occupancy right (GSA-owned or leased); and
- Tenant type (single or multi-tenant).

See *Figure 4* for the attributes of the 45 sampled buildings.

Figure 4 – Sampled Buildings’ Attributes

Region	Number of Buildings	Security Level			Occupancy Right		Tenant Type	
		2	3	4	GSA-Owned	Leased	Single	Multi-Tenant
2	9	5	2	2	4	5	4	5
4	24	18	4	2	7	17	12	12
7	<u>12</u>	<u>7</u>	<u>3</u>	<u>2</u>	<u>7</u>	<u>5</u>	<u>5</u>	<u>7</u>
Total	45	30	9	6	18	27	21	24

In selecting our sample, we wanted to maintain a proportionate number of buildings from each selected region and security level.

See *Figure 5* for the total number of buildings by region at security level 2, 3, and 4.

Figure 5 – Buildings by Region

Region	Number of Security Level 2, 3, or 4 Buildings	Percentage of Total Security Level 2, 3, or 4 Buildings	Number of Sampled Buildings	Percentage of Sampled Buildings
2	372	17%	9	20%
4	1,030	47%	24	53%
7	<u>781</u>	<u>36%</u>	<u>12</u>	<u>27%</u>
Total	2,183	100%	45	100%

See *Figure 6* for the number of buildings by security level for Regions 2, 4, and 7.

Figure 6 – Buildings by Security Level

Security Level	Number of Buildings	Percentage of Total Buildings	Number of Sampled Buildings	Percentage of Sampled Buildings
2	1,502	69%	30	67%
3	434	20%	9	20%
4	<u>247</u>	<u>11%</u>	<u>6</u>	<u>13%</u>
Total	2,183	100%	45	100%

To accomplish our objectives, we:

- Reviewed the 2006 MOA between PBS and DHS to obtain an understanding of its requirements;
- Reviewed the ISC standards to obtain an understanding of facility security assessments for federal buildings;
- Interviewed PBS and OMA management officials to determine the roles and responsibilities of PBS property managers regarding the receipt and use of facility security assessment reports;
- Reviewed facility security assessment reports provided by PBS and DHS officials to document the recommended countermeasures;
- Interviewed PBS property managers and OMA regional officials to: (1) determine if they received the facility security assessment reports, and (2) gain an understanding of their roles and responsibilities regarding the receipt and use of facility security assessment reports; and
- Contacted DHS officials to obtain the status of the MOA and facility security assessment reports.

We conducted the audit between June 2016 and May 2017 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 finding and conclusions based on our audit objectives.

Internal Controls

Our assessment of internal controls was limited to those necessary to address the objectives of the audit. Identified internal control issues are discussed in the Results section of this report.

Appendix B – GSA Comments



Office of Mission Assurance

November 21, 2017

MEMORANDUM FOR: CAROL F. OCHOA
INSPECTOR GENERAL
OFFICE OF THE INSPECTOR GENERAL

FROM: ROBERT J. CARTER
ASSOCIATE ADMINISTRATOR
OFFICE OF MISSION ASSURANCE

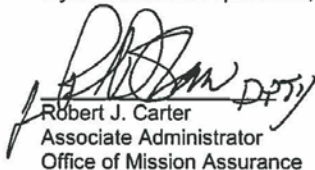
Thank you for the opportunity to review and comment on the draft the U.S. General Services Administration (GSA) Office of Inspector General's (OIG) report entitled *GSA Should Monitor and Track Facility Security Assessments*, dated October 27, 2017.

In the report, the OIG issued two (2) recommendations to GSA. The OIG recommends that GSA take the following actions:

1. Implement policies and procedures to:
 - a. Monitor and track facility security assessment reports. This should include developing an automated methodology to track whether the Public Buildings Service (PBS) received the facility security assessment reports.
 - b. Require that PBS and the Office of Mission Assurance (OMA) officials follow up with the Federal Protective Service (FPS) when reports are not received.
2. Require training for PBS property managers on the use of facility security assessment reports.

GSA concurs with your recommendations. We have no further comment until the final Report is released.

If you have further questions, please contact me at (202) 604-3412.


Robert J. Carter
Associate Administrator
Office of Mission Assurance

Appendix C – Report Distribution

Acting GSA Administrator (A)

Associate Administrator for Mission Assurance (D)

PBS Commissioner (P)

Chief Administrative Services Officer (H)

Audit Management Division (H1EB)

Audit Liaison (H1EB)

Assistant Inspector General for Auditing (JA)

Director, Audit Planning, Policy, and Operations Staff (JAO)