

# **EVALUATION OF SECURITY FEATURES OF THE STEWART LEE UDALL U.S. DEPARTMENT OF THE INTERIOR BUILDING**

This report was issued to the public on April 30, 2015. Before being issued, it was revised to reflect the official name of the Stewart Lee Udall U.S. Department of the Interior Building, and certain details were redacted. All redactions have been made pursuant to 5 U.S.C. §§ 552(b)(7)(F).



APR 3 0 2015

#### Memorandum

To:	Kristen J. Sarri Principal Deputy Assistant Secretary for Policy, Management and Budget
From:	Mary L. Kendall Deputy Inspector General
Subject:	Final Report – Evaluation of Security Features of the Stewart Lee Udall U.S. Department of the Interior Building (REVISED) Report No. ER-EV-PMB-0005-2014

This memorandum transmits the results of our review of the security features related to the major entrances of the U.S. Department of the Interior's (DOI) Stewart Lee Udall Interior Building (Udall Building).

We found several issues with security at the Udall Building's vehicle and pedestrian entrances, including retractable vehicle-restraint bollards that continually malfunction, ineffective risk mitigation and inconsistent tracking of bollard malfunctions, and lax security practices at pedestrian entrances. We believe that these issues, which we detail in the report, may compromise the safety of the building's occupants. We also question nearly \$4.4 million in costs related to the installation of the bollards.

We offered six recommendations to DOI to address these issues. In its response to our draft report, DOI concurred with all of our recommendations and stated that it is working to implement or close them (see Appendix 3). Based on this response, we consider the recommendations resolved, but not implemented (see Appendix 4), and we will forward them to the Office of Policy, Management and Budget to track their implementation.

The legislation creating the Office of Inspector General requires that we report to Congress semiannually on all audit, inspection, and evaluation reports issued; actions taken to implement our recommendations; and recommendations that have not been implemented.

If you have any questions about this report, please call me at 202-208-5745.

Office of Inspector General | Washington, DC

This report was revised to reflect the official name of the Stewart Lee Udall U.S. Department of the Interior Building

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# **Results in Brief**

Our review of physical security features at the headquarters of the U.S. Department of the Interior (DOI) found several issues concerning the Stewart Lee Udall Building's (Udall Building) vehicle entrances and parking garages. First, the retractable vehicle-restraint bollards that protect the garage entrances routinely malfunction, and when they do, the garages are often protected by only a single unarmed guard and plastic traffic cones. This problem has occurred continually since the bollards' installation, despite frequent maintenance and equipment upgrades. Moreover, DOI will assume the costs for repairing the bollards when their warranty expires later this year, but correctly budgeting for these repairs is impossible because DOI does not track malfunctions consistently. Because the bollards have never worked as intended, we questioned nearly \$4.4 million in costs associated with the system's installation.

In addition to the security problems at the vehicle entrances, we found that the guards at the Udall Building's two street-level pedestrian entrances were not consistently checking the identification of individuals entering the building, again leaving the Udall Building vulnerable to unauthorized entry.

Nearly 2,000 people, including DOI employees and contractors, employees of other Federal agencies, and members of the public, visit the Udall Building every day; the Secretary of the Interior, her staff, and DOI's bureau heads also maintain offices there. With the safety of so many at stake, DOI must ensure that its security features are sound.

We make six recommendations to the relevant DOI offices to improve the overall security of the Udall Building and to protect its occupants and visitors. We recommend replacing the flawed bollard system or developing an alternative means of ensuring security at garage entrances, resolving the cost of the bollards' installation, consistently closing the garage entrances when bollards malfunction and using backup entrances or other secure measures to replace the use of traffic cones.

tracking bollard malfunctions so that repairs can be budgeted for, and ensuring that the guards at the pedestrian entrances properly check the identification of people entering the Udall Building.

This report was revised to reflect the official name of the Stewart Lee Udall U.S. Department of the Interior Building. All redactions have been made pursuant to 5 U.S.C. §§ 552(b)(7)(F).

# Introduction

### Objective

We conducted this evaluation to determine if physical security features related to the major entrances of the Stewart Lee Udall Building (Udall Building) are functioning properly to control access to the facility. (See Appendix 1 for our scope and methodology.)

### Background

The Udall Building was designed and built between 1934 and 1937 to serve as the headquarters of the U.S. Department of the Interior (DOI). Located at 1849 C Street, NW., Washington, DC, the Udall Building consists of seven occupied stories and a basement. The building is made up of 6 wings with more than 3 miles of corridors; 2,200 rooms; 26 passenger and 2 freight elevators; and several special-purpose areas, including a child-care center, an auditorium, a cafeteria, a museum, a gymnasium, and a library. The Secretary of the Interior, her immediate staff, and the leadership for DOI's bureaus all have offices in the Udall Building. Most of the Udall Building is open to the public during normal business hours.

Currently listed on the National Register of Historic Places, the Udall Building is a U.S. Government-owned General Services Administration (GSA) building. GSA delegates onsite security operations to the Interior Complex Security Operations (ICSO) office, a division of DOI's Office of Law Enforcement and Security (OLES).

The Udall Building has two primary pedestrian entrances, five perimeter entrances to two employee garages, and one perimeter entrance to the Secretary's garage.



A number of reports have highlighted flaws in various security features of the Udall Building, particularly with regard to the vehicle entrances. In 2009, the Office of Inspector General (OIG) issued a management advisory to the Office of Policy, Management and Budget (PMB) indicating that the retractable hydraulic bollards on one of the ramps were malfunctioning. We recommended closing the ramp until the bollards could be made to work as designed. PMB officials responded that they were planning to replace the hydraulic mechanism used to

raise and lower the bollards with an electronic system. They anticipated that this update would remedy the malfunctions.

In addition, OLES conducted internal security assessments in 2009 and 2012 to determine the Udall Building's Federal security level (FSL) and assess its compliance with the requirements established in DOI's Departmental Manual. The Udall Building was determined to be an FSL IV (high-security) facility. Both OLES assessments found malfunctioning vehicle barriers and an absence of armed guards around the Udall Building. The 2012 assessment also found that the bollards malfunctioned frequently despite the replacement of the mechanism used to raise and lower them.

Most recently, in 2013, an OIG inspection determined that the PIV-II card reader on one of the ramps had been down for roughly 10 months. The card reader and software have since been replaced, correcting this issue, but the results of our inspection led to this evaluation to determine the effectiveness of other security features, including the bollards.

# Findings

We found that despite a documented history of failure, the bollards protecting the Udall Building garage entrances continually malfunction. Attempts to fix the bollards, including completely replacing the mechanism used to raise and lower them, have not improved the overall reliability of the system. These consistent failures often leave garage entrances vulnerable to forced entry, as no equivalent vehicle-restraint system is used in place of malfunctioning bollards. Inactive card readers at the doorways between garages and interior hallways, as well as inconsistent application of security protocols at pedestrian entrances, present further security concerns.

### **Malfunctioning Bollards**

A number of security features control entry to the garages beneath the Udall Building. Typically, when a vehicle attempts to enter the garage through an open entrance, a single unarmed guard checks identification and credentials to confirm that the vehicle and its occupants are authorized to enter. After doing so, the guard lowers the vehicle-restraining bollards designed to prevent forced entry, which in turn raises a mechanical arm that serves as a visual confirmation for the driver to proceed. During our review, we found that the bollards—perhaps the most critical feature in securing the entrances and ensuring the process is followed—have consistently malfunctioned since their installation.

Reports of bollard failures began almost immediately after installation began in late 2003. The original system, which was operated by a hydraulic raising and lowering mechanism, was procured through GSA at a cost of approximately \$2.3 million. This system performed so poorly that it was only installed on four of the six ramps before DOI procured a new electronic system, also through GSA, at a cost of \$2.1 million. Procurement for the installation of the new system began in 2009 and was completed in 2012, when GSA accepted the contract as fulfilled and handed maintenance responsibility for the system to DOI, despite the continued malfunctions.

To determine the extent of the issues with the bollards, we spoke with officials in OLES, which manages the contract for the guards that operate the bollards, and the Office of Facilities and Administrative Services (OFAS), which is responsible for maintaining the building, including the bollards. The OLES officials stated that roughly 85 percent of the time, there is a set of bollards malfunctioning at one of the entrances.

We requested data on the number of malfunctions from July 2011 through January 2014 and found that 245 separate incident reports had been filed for bollard malfunctions. For most malfunctions, the contractor who installed the bollards had to be called to restore them to service. In the past, these maintenance calls cost DOI nothing because the bollard system was covered under an extended

warranty; however, this warranty expired in November 2014. A partial warranty was extended to many of the mechanical parts of the system, but it will expire in October 2015. DOI will have to pay maintenance costs on parts not covered by the partial warranty until then, and on all bollard maintenance after that date.

We are concerned by the persistent failure of these devices and the security vulnerability created by these failures. OLES officials have expressed similar concern, as noted by the head of ICSO in a February 20, 2013 email:

It is clear from established operational history . . . that the bollards and the control systems that operate them are impaired to such a significant degree that the system as a whole (to include all ramps) cannot be considered a legitimate contribution to the security of the building and are therefore a vulnerability and a liability to the safety and security of the building and personnel, including children, that reside within.

We inquired about long-term solutions to this problem, but neither OFAS nor OLES officials could provide ways to permanently resolve the bollard malfunctions. Officials in both offices, as well as the former Deputy Assistant Secretary of Technology, Information and Business Services, stated that budgetary restrictions limit their options. According to an OFAS official, completely replacing the system would cost an estimated \$3 million.

Because these bollards are critical to preventing forced entry into the garages under the Udall Building, and because of their demonstrated inability to perform consistently, we question the nearly \$4.4 million associated with the installation of the original hydraulic and new electronic bollard systems as wasted funds (see Appendix 2).

#### Recommendations

We recommend that PMB:

- 1. Consider replacing the flawed bollard system, or develop and implement a plan to ensure that the security level of the garage entrances is adequate for a high-security Federal building; and
- 2. Resolve the nearly \$4.4 million in questioned costs associated with the installation of the ineffective bollard systems.

### **Ineffective Risk Mitigation**

OLES officials informed us that if the bollards at a given garage entrance are not functioning, OLES mitigates the security risk by shutting down the ramp and

using the appropriate backup ramp for that section of the garage. We found that in the cases where the bollards are not functioning for both the primary ramp and its backup, OLES has resorted to using plastic traffic cones as a vehicle barrier; the unarmed guard simply moves the cones aside to let cars in and out of the garage. Once past the cones and the unarmed guard, vehicles are directly under the Udall Building.

During our fieldwork, we observed 25 instances of these plastic cones being used in place of the bollards (see Figure 1). In addition, OIG staff at the Udall Building noted several occurrences of bollard malfunction and cone use after our fieldwork ended. While other security features, such as the unarmed guard and the card readers, are still in place during a bollard malfunction, plastic cones clearly cannot provide the same level of protection that a functional bollard system does against a vehicle attempting to forcibly enter the garage, and are woefully inadequate as risk mitigation. We noted this issue in our 2009 management advisory, where we stated: "The current use of an unarmed security guard and plastic traffic cones to secure this entrance is inadequate, and indicates either remarkable complacency or a complete disregard for security concerns."



Figure 1. View of street from garage ramp C, showing traffic cones blocking the entrance.



#### Recommendations

We recommend that OLES:

- 3. Begin consistently closing garage entrances with malfunctioning bollards and using backup entrances or other secure mitigation measures to replace the use of traffic cones; and
- 4.

### **Inconsistent Tracking of Bollard Malfunctions**

When we tried to quantify the rate of bollard malfunctions over time, we found that neither OFAS nor OLES is required to track these incidents. OLES has been documenting most malfunctions via security incident reports, which allowed us to ascertain the 245 instances from July 2011 through January 2014, but its records are incomplete because the reports are not mandatory. No comprehensive database of bollard malfunctions exists, meaning that our figure of 245 reports may well be an underestimate.

The original comprehensive warranty for the bollards has expired, but a new 1-year warranty, expiring in October 2015, covers many of the mechanical parts of the bollard system. Failure of parts not covered by this warranty or repairs that occur after the warranty expires will be charged to DOI. Due to the inconsistent tracking of incidents, costs are unpredictable, leaving DOI at a disadvantage because it cannot properly estimate a budget for repairs.

#### Recommendation

We recommend that OFAS:

5. Begin tracking each incidence of bollard malfunction, to include time of malfunction, time of response by contractor, time of repair, and type of repairs completed to bring bollards back into service.

### Lax Security at Pedestrian Entrances

All personnel working in or visiting the Udall Building must possess one of two identification cards, a PIV-II badge or a temporary building pass issued by the reception desk. Entry to the Udall Building, whether through the pedestrian or

vehicle entrances, is gained through the card readers, which authenticate individuals' levels of building access.

Guards stationed at the entrances are supposed to examine each person's badge or pass to validate its legitimacy. For an individual with a PIV-II badge, guards are supposed to observe as the person places the badge on the card reader and to wait for the system to indicate that access to the building is granted. If the card reader indicates that it cannot read the badge, or if it signals that access is denied, the guard is to direct the person to the reception desk for further assistance.

We tested the security apparatus of the Udall Building's pedestrian entrances to see if guards were examining badges and if we could gain entrance without valid credentials. In all seven of our attempts, we noted that the guards failed to properly conduct at least one of the required steps, including several attempts in which a guard failed to notice that the card reader indicated that we should have been denied access to the building. By not following these steps correctly, the Udall Building's security guards cannot prevent nonemployees from gaining access to the building, nor can they prevent insider threats, such as a recently fired employee attempting to gain entrance after his or her credentials have been cancelled.

OIG staff at the Udall Building have noted that after we issued a draft of this report to DOI, guards began consistently following the proper procedure for verifying credentials. We encourage OLES staff to continue to monitor the guards to ensure that procedures are being followed.

#### Recommendation

We recommend that OLES:

6. Increase the oversight and accountability of the contract guards to ensure that they perform their duties correctly.

# **Conclusion and Recommendations**

### Conclusion

Our findings show that despite repeated reports drawing attention to the failure of the bollard system, none of the corrective action DOI has taken has been sufficient to properly secure the Udall Building's garage entrances. In addition, despite OLES officials' awareness of the security risk presented by the bollards' consistent failure, no adequate steps have been taken to mitigate this risk, and traffic cones continue to serve as a replacement for the bollard system. Finally, inactive card readers and poorly followed security protocols at pedestrian entrances present an additional risk to the safety and security of the personnel at the Udall Building.

### **Summary of Recommendations**

We recommend that:

1. PMB consider replacing the flawed bollard system, or develop and implement a plan to ensure that the security level of the garage entrances is adequate for a high-security Federal building.

#### **PMB** Response

In its response to our draft report, PMB concurred with this recommendation. PMB stated that it is conducting a 6-month evaluation to determine the effectiveness of a corrective action plan for the system. This plan, which was initiated on July 7, 2014, and completed on November 11, 2014, included actions such as installing new and upgraded parts and increasing the frequency of maintenance. PMB will also take steps to identify a potential replacement system if deemed necessary.

2. PMB resolve the nearly \$4.4 million in questioned costs associated with the installation of the ineffective bollard systems.

#### **PMB Response**

PMB concurred with this recommendation via email from the Acting Deputy Assistant Secretary for Technology, Information and Business Services. DOI will begin discussions with GSA regarding a possible reduction in rent, as the cost of that system was amortized over a 20-year period via rent costs to DOI.

3. OLES begin consistently closing garage entrances with malfunctioning bollards and using backup entrances or other secure mitigation measures to replace the use of traffic cones.

#### **OLES Response**

OLES concurred with this recommendation. OLES and OFAS will coordinate to ensure that traffic cones are no longer used. Instead, ramps with bollard malfunctions will be closed and backup ramps used; if a backup ramp also malfunctions, OLES will dispatch an armed guard to the primary ramp and place bicycle racks across the ramp to serve as a secondary security measure. The armed guard and bicycle racks will remain in place until the bollards are functioning correctly.



5. OFAS begin tracking each incidence of bollard malfunction, to include time of malfunction, time of response by contractor, time of repair, and type of repairs completed to bring bollards back into service.

#### **OFAS Response**

OFAS concurred with this recommendation. A file will be developed in Google Drive for authorized OLES and OFAS personnel to track the nature of each malfunction, time of response by the contractor, time of repair, and type of repairs.

6. OLES increase the oversight and accountability of the contract guards to ensure that they perform their duties correctly.

#### **OLES Response**

OLES concurred with this recommendation. OLES currently requires guards to perform a facial recognition inspection in addition to the employee scanning his or her PIV-II card before access is granted to the building. Once the Physical Access Control System is fully operational, dual authentication—scanning the PIV-II card and entering the personal identification number—will verify employee identity.

We consider these six recommendations resolved but not implemented, and we will refer them to PMB to track their implementation. See Appendix 3 for the full text of DOI's response. Appendix 4 lists the current status of our recommendations.

# **Appendix I: Scope and Methodology**

### Scope

We reviewed the security apparatus at the U.S. Department of the Interior's (DOI) Stewart Lee Udall Building (Udall Building), focusing on its pedestrian and vehicle entrances, to determine if physical security features are functioning properly to control access to the facility.

We conducted our evaluation in accordance with the Quality Standards for Inspections as put forth by the Council of Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusions and recommendations.

## Methodology

To accomplish the objective of our evaluation, we-

- obtained a general understanding of the security apparatus of the Udall Building;
- interviewed officials from DOI's Office of Law Enforcement and Security and Office of Facilities and Administrative Services, as well as the former Deputy Assistant Secretary of Technology, Information and Business Services;
- reviewed DOI's policies, procedures, and Departmental Manual, and the Department of Homeland Security's "Physical Security Criteria for Federal Facilities";
- tested the security measures at the Udall Building's pedestrian entrances; and
- monitored vehicle entrances to the Udall Building garages to determine what security measures were in use.

# **Appendix 2: Monetary Impact**

Issues	Questioned Costs
Hydraulic Bollard System	\$2,259,831
Electrical Bollard System	\$2,098,390
Totals	\$4,358,221

# Appendix 3: U.S. Department of the Interior's Response to Draft Report

The Department's response to our draft report follows on page 14.



### United States Department of the Interior

OFFICE OF THE SECRETARY Washington, DC 20240

NOV 2 0 2014

Memorandum

To: Kimberly Elmore Assistant Inspector General Audits, Evaluations and Inspections

From: Kristen J. Sarri Principal Deputy Assistant Secretary Policy, Management and Budget

Subject: Response to Report No. ER-EV-PMB-0005-2114, "Evaluation of Security Features of the Main Interior Building"

Attached is our response to Report No. ER-EV-PMB-0005-2114, "Evaluation of Security Features of the Main Interior Building." The Department considers the security of our employees and visitors to the Main Interior Building a top priority. We are implementing appropriate steps immediately to maintain the integrity of our security posture while ensuring that American taxpayer dollars are spent wisely.

If you have any questions, please do not hesitate to contact me or my Chief of Staff, Amy Holley.

Attachment

#### **Recommendation 1**

PMB consider replacing the flawed bollard system, or develop and implement a plan to ensure that the security level of the garage entrances is adequate for a high-security Federal building.

#### **Response: Concur**

PMB is conducting a 6 month evaluation to determine the effectiveness of the corrective action plan implemented for the Nasatka-installed electric bollard system. Initiated the corrective action plan on July 7, 2014 and completed it on November 11, 2014. Took the following steps to improve the operational reliability of the electric bollard system:

- Installation of new moisture resistant motors, chains and guide bars; this includes an extended warranty for one year for these parts. As of November 11, 2014, all ramps were completed and placed in service. The ramps are being tested daily. Even though the new components have been in place a relatively short period of time, the overall reliability improved with the upgrades and operational security improvements realized.
- The Office of Facilities and Administrative Services (OFAS) modified the preventative maintenance plan and changed the maintenance cycle from a quarterly to a monthly cycle to improve the reliability of the system.
- Since the beginning of October 2014, the MIB security guard staff are testing the bollards on Ramps A, B, C and E three times a day. Ramps B, C and E experienced no documented issues. The bollards on Ramp A experienced two problems since they were replaced and each has been resolved by Nasatka. The bollards on Ramp D were recently completed and have not experienced any problems during testing.

PMB will use the following standards to evaluate the effectiveness of the bollard system during the next six months; research did not result in identifying industry standards for performance of this type of system.

- o No ramp is out of service longer than five business days due to bollard component failure
- No major bollard component failures surface (i.e., motors, chains, guides)
- No ramp experiences multiple outages of more than four hours within one month because of bollard failures

PMB will take the following proactive steps during the six month period to identify a potential replacement system if one becomes necessary or if the current system fails to perform as expected. The risk in pursuing a replacement system however, is the technology and past performance at a facility with similar characteristics as the MIB is extremely limited.

- Conduct market research to identify bollard systems with proven performance history, a reliable operating system and minimally invasive installation to allow us to reuse the existing infrastructure.
- Contact other federal locations with automated bollard systems to obtain feedback on their systems.
- Request information from our Energy Service Company, Ameresco, on their knowledge of automated bollard systems and possible retrofits with proven performance history.

Target completion date: May 31, 2015

Responsible Official - Joe Nassar, Director, OFAS

#### **Recommendation 2**

PMB should resolve the nearly \$4.4 million in questioned costs associated with the installation of the ineffective bollard systems.

#### Response

OFAS provided the OIG cost information obtained from GSA related to the installation of the "old" hydraulic bollard system in place from 2003 - 2012 (roughly \$2.3 million) as well as costs to replace the hydraulic system with a new electric system (roughly \$2.1 million). The costs for each system was influenced by the design-build requirements of the project based on unique conditions of the site (i.e., historic building and the raised ramps), security standards in place at the time of the project and the requirement to comply with historic preservation requirements presented by the National Capital Planning Commission and the Commission of Fine Arts.

Funding for the initial installation of the hydraulic system was provided by GSA who amortized the costs over a 20 year period via rent costs to DOI. The current Occupancy Agreement with GSA for the MIB documents the cost and the amortization schedule. Since GSA initiated the installation of a modern electric bollard system in 2012, DOI will begin dialogue with GSA regarding a possible reduction in rent since the original bollard system was replaced. GSA funded the new electric bollard system, installed in 2012, with ARRA funding.

As stated previously, the bollard system at the MIB is a customized installation and included very difficult design conditions and impact loads specified by the Department of State Certified Anti-ram Vehicle Barrier testing criteria. The design challenges and previous failures of the hydraulic bollards resulted in new design features for the electric bollards. Even with the new installation of the electric bollards, DOI experienced failure issues that can be attributed to the sloped or raised ramps as typical designs are on flat surfaces that have the ability to divert water away from the system. Additionally, failures can be attributed to temperature differences with

the metal bollards since components of the MIB metal bollards are not below ground as is common at other facilities.

#### **Recommendation 3**

OLES begin consistently closing garage entrances with malfunctioning bollards and using backup entrances or other secure mitigation measures to replace the use of traffic cones.

#### **Response:** Concur

The Office of Law Enforcement and Security (OLES) implemented new mitigation measures in response to bollard failures. Traffic cones will no longer be used; OLES and OFAS will coordinate to ensure the following actions are taken should a bollard malfunction.

- Immediately close down the affected ramp and open the adjoining ramp for vehicular traffic.
- If the adjoining ramp is also experiencing a bollard malfunction, an armed guard will be dispatched to the primary ramp and bicycle racks will be strategically placed across the inbound/outbound lanes to serve as a secondary security measure.
- The armed guard and bike racks will remain until the bollards are fixed and working properly.

Target completion date: November 20, 2014

Responsible Official - Harry Humbert, Director, OLES and Joe Nassar, Director, OFAS

#### **Recommendation 4**

**Response: Concur** 



#### Responsible Official - Harry Humbert, Director, OLES

#### **Recommendation 5**

OFAS should begin tracking each incidence of bollard malfunction, to include time of malfunction, time of response by contractor, time of repair, and type of repairs completed to bring bollards back into service.

#### **Response:** Concur

A file will be developed in Google Drive that OLES and OFAS authorized personnel will use to track bollard malfunctions, time of response by contractor, time of repair, and type of repairs. Notification to the contractor, bollard repairs and noted issues will be added by OFAS personnel.

Target completion date: December 1, 2014.

Responsible Official - Joe Nassar, Director, OFAS

#### **Recommendation 6**

OLES increase the oversight and accountability of the contract guards to ensure that they perform their duties correctly.

#### **Response:** Concur

OLES currently requires the guards to perform dual inspections (e.g., verify Government credentials by performing a facial recognition) before building access is granted. Once the Physical Access Control System is fully operational, dual-authentication (i.e., scanning of DOI Access/PIV card and use of PIN number) will verify employee identification.

Target completion date: January 31, 2015

Responsible Official - Harry Humbert, Director, OLES

# Appendix 4: Status of Recommendations

In its response to our draft report, the U.S. Department of the Interior concurred with our six recommendations and stated that it was working to implement or close them. The response included target dates and an action official for each recommendation (see Appendix 3). We consider these recommendations resolved but not implemented.

Recommendations	Status	Action Required
1, 2, 3, 4, 5, 6	Resolved but not implemented	We will refer these recommendations to the Office of Policy, Management and Budget to track their implementation.

# **<u>Report Fraud, Waste,</u>** <u>and Mismanagement</u>



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