

The Federal Air Marshal Service Has Sufficient Policies and Procedures for Addressing Misconduct





DHS OIG HIGHLIGHTS

The Federal Air Marshal Service Has Sufficient Policies and Procedures for Addressing Misconduct

September 13, 2017

Why We Did This Audit

The *TSA Office of Inspection Accountability Act of 2015*, Public Law 114-53, required us to review FAMS personnel policies and procedures for identifying misuse of Government resources and existing code of conduct or integrity policies with respect to instances of misconduct.

What We Recommend

This report contains no recommendations.

For Further Information:

Contact our Office of Public Affairs at (202) 254-4100, or email us at DHS-OIG.OfficePublicAffairs@oig.dhs.gov

What We Found

The Federal Air Marshal Service (FAMS) is a division of the Transportation Security Administration (TSA). FAMS is responsible for promoting confidence in civil aviation by deploying Federal air marshals to detect, deter, and defeat hostile acts targeting transportation systems. Because of its law enforcement mission, FAMS developed a series of unique policies and procedures to address conduct related to air marshals' specific duties, while also operating under the purview of TSA's conduct code and misconduct policies and procedures.

FAMS has sufficient policies and procedures to establish expectations for appropriate conduct, identify misuse of Government resources, and address misconduct allegations. FAMS' policies specifically require all employees to report suspected misconduct. Additionally, TSA and FAMS have a systematic and multilayered process for handling FAMS misconduct issues, which includes review of misconduct allegations by two separate and independent offices.

FAMS Response

FAMS had no additional comments, and TSA stated that it will continue to apply its policies and procedures to help ensure conduct issues are addressed appropriately.




OFFICE OF INSPECTOR GENERAL
Department of Homeland Security

Washington, DC 20528 / www.oig.dhs.gov

September 13, 2017

MEMORANDUM FOR: Roderick Allison
Assistant Administrator, Office of Law Enforcement –
Federal Air Marshal Service
Transportation Security Administration

FROM: John V. Kelly 
Deputy Inspector General

SUBJECT: *The Federal Air Marshal Service Has Sufficient Policies
and Procedures for Addressing Misconduct*

Attached for your information is our final report, *The Federal Air Marshal Service Has Sufficient Policies and Procedures for Addressing Misconduct*. We incorporated the formal comments from Administrator Pecoske in the final report. The report contains no recommendations.

Consistent with our responsibility under the *Inspector General Act*, we will provide copies of our report to congressional committees with oversight and appropriation responsibility over the Department of Homeland Security. We will post the report on our website for public dissemination.

Please call me with any questions, or your staff may contact Donald Bumgardner, Deputy Assistant Inspector General for Audits, at (202) 254-4100; or Lisa Vonder Haar, Audit Director, at (202) 254-4143.

Attachment



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Background

The Federal Air Marshal Service (FAMS) is a division of the Transportation Security Administration (TSA). FAMS is responsible for promoting confidence in civil aviation by deploying Federal air marshals to detect, deter, and defeat hostile acts targeting transportation systems. Because of its law enforcement mission, FAMS developed a series of unique policies and procedures to address conduct related to air marshals' specific duties, while also operating under the purview of TSA's conduct code and misconduct policies and procedures.

The *TSA Office of Inspection Accountability Act of 2015* (Public Law 114-53), required us (the Office of Inspector General) to review FAMS' policies and procedures for identifying misuse of Government resources, as well as the administration of FAMS' code of conduct or integrity policies with respect to instances of misconduct. We incorporated this requirement into our ongoing department-wide audit of conduct and discipline, which seeks to determine whether the Department of Homeland Security and its components have sufficient processes and procedures to address conduct issues. This report addresses our findings for FAMS. We plan to issue separate reports for other selected components and a summary report at the conclusion of the conduct and discipline audit.¹

Results of Audit

FAMS has sufficient policies and procedures to establish expectations for appropriate conduct, identify misuse of Government resources, and address misconduct allegations. FAMS' policies specifically require all employees to report suspected misconduct. Additionally, TSA and FAMS have a systematic and multilayered process for handling FAMS misconduct issues, which includes review of misconduct allegations by two separate and independent offices.

Establishing Expectations for Conduct

TSA and FAMS have several policies that establish expectations for appropriate conduct. FAMS' *Employee Responsibilities and Conduct* policy and TSA's *Employee Responsibilities and Code of Conduct* address behavioral expectations in the performance of duties, as well as specific expectations for the use of Government resources, including:

- protecting and conserving Government property, and not using or allowing its use for unauthorized purposes;
- reporting waste, fraud, abuse, and corruption;

¹ We expect to release the summary report in fall 2017.



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- providing efficient service to the public;
- not abusing position or soliciting gifts based on employees' official position; and
- conserving, protecting, and ensuring appropriate use of Federal resources, including time, information, and personnel.

TSA also has a *Guide to Major Ethics Rules*, which includes practical examples related to ethical principles, such as misuse of an official position and impartiality. Additionally, FAMS implemented several policies to clarify expectations for employee behavior both on and off duty. For example, FAMS established roles and responsibilities for personnel on missions and expectations for alcohol use.

TSA requires employees to certify that they have read and understand its conduct code during successive annual trainings. According to TSA, approximately 98 percent of air marshals completed the required certification in fiscal year 2016. Additionally, air marshals certify that they have read and understand the FAMS conduct code within 1 week of entrance on duty and annually during performance reviews.

Training on Expectations for Conduct

TSA and FAMS provide training that addresses misconduct and misuse of Government resources. Specifically, TSA requires annual refresher training for all employees on its code of conduct. FAMS also provides training on ethical behavior during basic training, as well as training on Government travel card use every 2 years. According to FAMS, supervisors are required to take a leadership course that covers actions or behaviors that must be reported as possible misconduct (incidents), responsibilities for investigating cases, and disciplinary actions. FAMS requires each special agent in charge to certify annual attendance of supervisory training. Furthermore, all TSA supervisors are required to take specific supervisor training on TSA's policy on employee responsibilities and code of conduct. FAMS stated that it tracks and verifies completion of training requirements in a database, which it reviews quarterly.

Identifying Misconduct

TSA policy requires all employees to report violations of law, regulation, policy, and standard operating procedures within their established chain of command. *FAMS' Consolidated Incident Reporting* policy also requires supervisors to report all potential misconduct to the Incident Activity Coordination and Trends (IACT) Unit. All air marshals must report suspected misconduct or face potential disciplinary action.

We interviewed 68 nonsupervisory and supervisory air marshals at 3 field offices about conduct policies. We discussed policies, policy communication



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and training, and supervisory discussions about reporting misconduct. We also asked how and if each person would report misconduct, their understanding of available options for reporting misconduct, and how misconduct is addressed in the office. During our interviews, we found that air marshals generally understood expected behavior. The majority of air marshals we interviewed indicated they know how to report misconduct and would report it.

Proactive Monitoring

FAMS employs monitoring procedures to identify potential misuse of Government resources. For example, FAMS headquarters reviews monthly Government travel card transaction reports in coordination with field offices. We verified this by reviewing a sample of travel card tracking documentation, official reports, and internal notification emails. A FAMS administration official also said that FAMS conducts audits of travel vouchers and provided an example of a debt collection letter resulting from such audits.

Additionally, FAMS completes a compliance assessment for TSA's Office of Finance and Administration, which includes a physical inventory of all property, quarterly firearm accountability inventories, TSA vehicle record reviews, and several types of financial records. The compliance assessment also includes a review of training records to ensure employees receive required training on subjects such as purchase cards and time and attendance approval. FAMS field offices also created other monitoring processes, such as monthly time and attendance audits.

Addressing Misconduct Allegations

TSA and FAMS have a systematic and multilayered process for handling FAMS misconduct allegations.² The process generally begins when a supervisor reports an incident (suspected misconduct) to the FAMS IACT Unit, as required by FAMS' *Consolidated Incident Reporting* policy. The IACT Unit categorizes the incident and determines whether it falls under one of the few specific categories that FAMS is authorized to handle internally, such as late credit card payments and grooming issues. (FAMS is not authorized to internally handle instances related to misuse of Government resources.) IACT forwards all other categories to TSA's Office of Inspections (OOI) for review.

We reviewed FAMS data for identifying and categorizing incidents. FAMS recorded more than 3,000 reported incidents in FYs 2014–2016, and categorized them in 79 different specific offenses on TSA's Table of Offenses

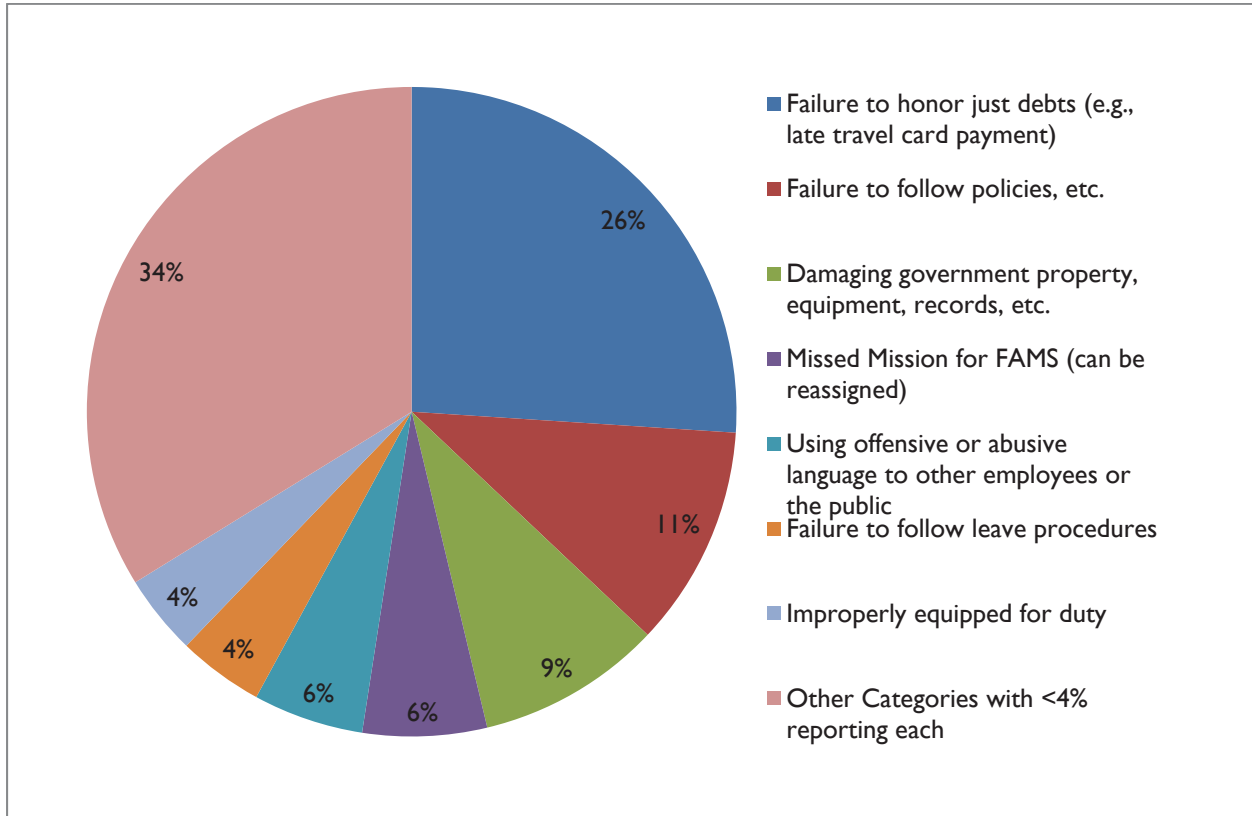
² TSA revised its disciplinary policies to identify the types of incidents that air marshals must report and implemented new policies for the investigation and adjudication of air marshals' incidents as a result of our January 2012 report, *Allegations of Misconduct and Illegal Discrimination and Retaliation in the Federal Air Marshal Service* (OIG-12-28).



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and Penalties (see appendix B).³ Figure 1 shows the top seven categories in FYs 2014–2016.

Figure 1. Top Seven Incident Categories, FYs 2014–2016



Source: DHS Office of Inspector General (OIG) analysis of FAMS data

As shown in Figure 2, OOI reviews the information from IACT and determines whether the allegation must be referred to DHS OIG.⁴ If DHS OIG declines to investigate or if no referral is necessary, then OOI further requests and reviews evidence on the alleged misconduct, which may lead to a full investigation. For some incidents, OOI officials said that if they determine no procedure or law was violated, they return the case to FAMS IACT for closure. OOI forwards all other cases and related documentation to the TSA Office of Professional Responsibility (OPR) to determine whether the evidence is sufficient to propose and sustain a charge of misconduct. OPR assigns an independent reviewer to determine whether misconduct occurred. For confirmed misconduct, OPR determines an appropriate disciplinary action.

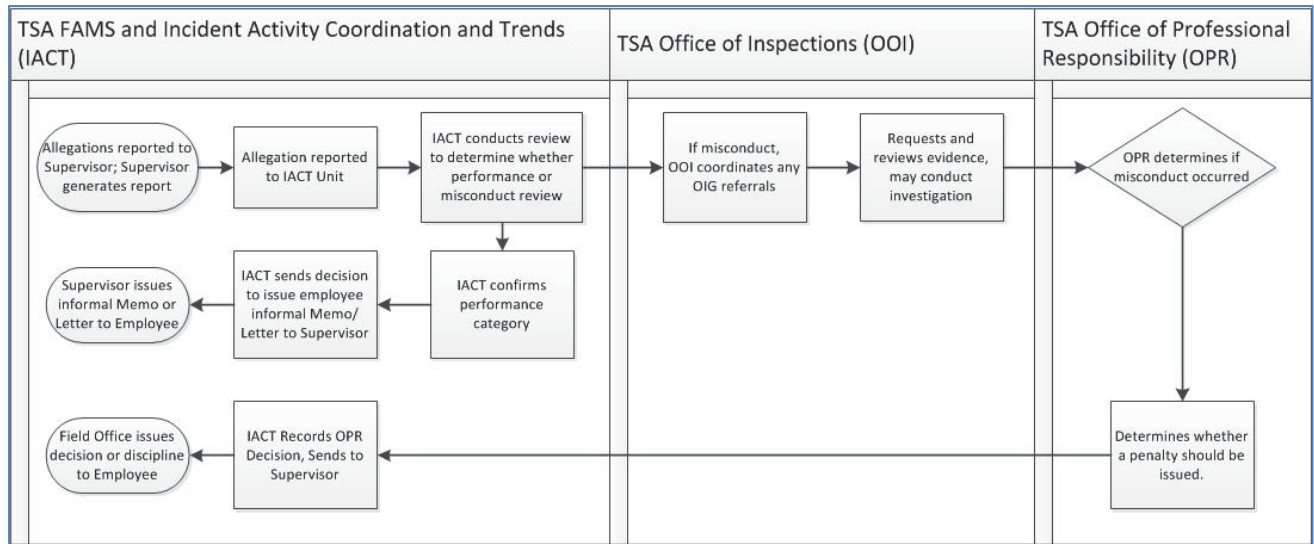
³ Recorded incidents include both allegations of misconduct and other reportable incidents, such as interactions with law enforcement on personal time.

⁴ DHS MD 0810.1 requires components to refer cases to DHS OIG prior to conducting investigations, with immediate referrals for cases in some categories.



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Figure 2. Process for Handling FAMS Misconduct Allegations



Source: OIG analysis of FAMS data

OPR reviewers use a variety of factors to determine appropriate penalties, including TSA’s Table of Offenses and Penalties, which lists offenses and recommended, aggravated, and mitigated penalty ranges. Among this list of offenses are specific categories for the misuse of Government resources, including:

- accepting or soliciting a bribe;
- use of public office for private gain;
- directly or indirectly soliciting a gift or accepting a gift from a prohibited source;
- actual or attempted theft, or other unauthorized taking of funds or property owned or controlled by the Government;
- unauthorized use or misuse of law enforcement equipment, resources;
- time and attendance fraud; and
- fraudulent or abusive use of a Government charge card or travel card.

We judgmentally selected 25 misconduct allegation casefiles to review. Of these, we randomly selected five cases in each of the top five most common categories of incidents (see Figure 1). In two categories, we randomly selected cases that FAMS handled internally. In the remaining categories, our selection was random and included all types of incidents. We concluded that FAMS properly handled or referred all of the cases we reviewed. Our review included a determination of whether IACT and OOI referred certain categories of cases to OIG immediately upon receipt as required.⁵ One case was applicable, which TSA timely referred to OIG.

⁵ We reviewed case files to determine whether TSA reported cases to OIG as required by DHS Management Directive 0810.1, Appendix A.
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Our review also included other factors, such as whether the case files contained sufficient supporting evidence and whether OPR officials followed TSA's established processes for providing notice and advising employees of rights when making disciplinary decisions.⁶ We concluded that the cases we reviewed met these criteria.

We also reviewed IACT and HR databases and did not find any discrepancies relating to investigations or fact-finding referrals, proposal or adjudication information, or discipline decisions.

Conclusion

FAMS has sufficient policies and procedures to identify misconduct and address misconduct allegations. TSA and FAMS established (1) expectations for appropriate conduct through policy and training, and (2) policies that specifically require all employees to report suspected misconduct. FAMS should apply these policies and procedures to help ensure conduct issues are addressed appropriately.

Objective, Scope, and Methodology

The DHS Office of Inspector General (OIG) was established by the *Homeland Security Act of 2002* (Public Law 107-296) by amendment to the *Inspector General Act of 1978*.

As required by Section 8 of Public Law 114-53, we reviewed TSA and FAMS personnel policies and procedures for identifying the misuse of Government resources and the administration of code of conduct and integrity policies with respect to instances of misconduct. We also included FAMS in our department-wide audit of conduct and discipline, the objective of which is to determine whether DHS and its components have sufficient processes and procedures to address conduct issues.

We interviewed TSA officials from the Offices of Human Capital; Professional Responsibility; Inspections; Chief Counsel; Finance and Administration; Training and Development; Information Technology; and the Office of Civil Rights and Liberties, Ombudsman, and Traveler Engagement. We also met with officials from FAMS' IACT Unit; Transportation Security Operations Center; Business Management Office; and supervisors and employees at the Washington, DC; Chicago, Illinois; and Dallas, Texas field offices.

⁶ TSA disciplinary proceedings follow TSA Management Directive 1100.75-3, *Addressing Unacceptable Performance and Conduct*.
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We reviewed relevant DHS, TSA, and FAMS policies and procedures for handling conduct issues, including DHS Management Directive 0810.1, *The Office of the Inspector General*; TSA Management Directive No. 1100.73-5, *Employee Responsibilities and Code of Conduct*; TSA Management Directive No. 1100.75-3, *Addressing Unacceptable Performance and Conduct*; FAMS OLE 1112 policy, *Employee Responsibilities and Conduct*; and FAMS OLE 3417 policy, *Consolidated Incident Reporting*. We did not test the effectiveness of these policies and procedures.

We requested incident data on FAMS from IACT, OOI, and OPR from fiscal years 2014 to 2016. We used this data to select a judgmental sample of closed FAMS incident casefiles, which we reviewed to determine whether allegation, investigative, and adjudication records met legal requirements. We also compared casefile records to databases to assess the reliability of these data systems. From the selection of reviewed casefiles that included OIG referrals, we checked OIG Hotline records to verify that they were referred.

We conducted this performance audit between October 2016 and April 2017 pursuant to the *Inspector General Act of 1978*, as amended, and according to 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 upon our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

The Office of Audits contributors to this report are Lisa Vonder Haar, Director; Anne Mattingly, Audit Manager; Michael Staver, Audit Manager; Heidi Einsweiler, Analyst in Charge; Philip Emswiler, Analyst in Charge; Tessa Clement, Analyst; Jeanette Hyatt, Auditor; Kathleen Hyland, Auditor; Nancy Pergolizzi, Auditor; Kendra Starkus, Analyst; Ellen Gallagher, Communications Analyst; and Falon Newman-Duckworth, Independent Referencer.



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Appendix A
FAMS Comments to the Draft Report

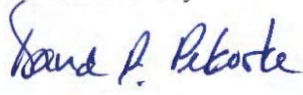
U.S. Department of Homeland Security
601 South 12th Street
Arlington, VA 20598



**Transportation
Security
Administration**

AUG 25 2017

MEMORANDUM FOR: John V. Kelly
Deputy Inspector General
Office of Inspector General
U.S. Department of Homeland Security

FROM: David P. Pekoske 
Administrator

SUBJECT: Response to Draft Report, "*The Federal Air Marshal Service Has Sufficient Policies and Procedures for Addressing Misconduct*," OIG-17-XXX

This memorandum constitutes the Transportation Security Administration's (TSA) formal response to the Draft Report, "*The Federal Air Marshal Service Has Sufficient Policies and Procedures for Addressing Misconduct*," OIG-17-XXX. TSA thanks the Office of Inspector General (OIG) for their independent review of how the Federal Air Marshal Service (FAMS) addresses misconduct and the time and effort invested into this report. TSA appreciates the opportunity to review and provide comments to the U.S. Department of Homeland Security (DHS) OIG draft report.

Between October 2016 and April 2017, DHS OIG conducted this comprehensive review of the Office of Law Enforcement/Federal Air Marshal Service (OLE/FAMS) conduct and discipline process. In particular, DHS OIG examined OLE/FAMS policies and procedures for identifying misuse of Government resources, as well as the administration of OLE/FAMS' code of conduct or integrity policies with respect to instances of misconduct.

OLE/FAMS has worked to hold all employees accountable by ensuring an understanding of expectations of conduct, providing specific training of these expectations, and through a systematic process external to OLE/FAMS reviewing all allegations of misconduct. Additionally, OLE/FAMS implemented a program to ensure consistent and timely resolution of 12 different categories of non-disciplinary performance incidents. The improved efficiency of this program has enabled OLE/FAMS to adjudicate these non-disciplinary cases within 2 weeks of the incident.

We are pleased to note DHS OIG's recognition that OLE/FAMS has sufficient policies and procedures to establish expectations for appropriate conduct, identify misuse of government resources, and address misconduct allegations, as well as the effectiveness of the systemic and multilayered process TSA and OLE/FAMS have for handling employee misconduct issues. OLE/FAMS will continue to apply these policies and procedures to help ensure conduct issues are addressed appropriately.



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Appendix B
FAMS Incident Report Categorizations in FYs 2014–2016

The following table depicts the number of reported incidents and allegations of misconduct. It is not a list of confirmed misconduct charges.

Nature of Allegation/Incident Offense	Total	% of Grand Total
Failure to honor just debts (e.g., late travel card payment)	800	26.02%
Failure to follow policies, etc.	339	11.03%
Damaging government property, equipment, records, etc.	283	9.21%
Missed Mission for FAMS (can be reassigned)	190	6.18%
Using offensive or abusive language to other employees or the public	169	5.50%
Failure to follow leave procedures	131	4.26%
Improperly equipped for duty	123	4.00%
Improper or negligent use of Government charge card or travel card	115	3.74%
Inappropriate storage, care, loss, or misplacement of a weapon or ammunition	93	3.03%
Failing to promptly report violations of TSA policies or procedures	83	2.70%
AWOL of one workday or less	82	2.67%
Failure to promptly and fully comply with directions, instructions, or assignments of a supervisor or other management official	68	2.21%
Criminal, infamous, immoral or notoriously disgraceful conduct; conduct that results in a felony or misdemeanor conviction (or finding of not guilty by reason of insanity), guilty or no contest plea, or equivalent or similar legal result or action (the misconduct shall not be deemed “mitigated” by a plea arrangement, suspended sentence, parole in lieu of confinement, sentence limited to time served, probation or other modification of penalty attached to the conviction or associated with the crime)	62	2.02%



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Other ¹	59	1.92%
Creating the appearance of a conflict of interest or of violating the law or the ethical standards of conduct	34	1.11%
Fighting, threatening, intimidating, attempting to inflict or inflicting bodily harm on another; harassing or provoking quarrel; engaging in horseplay; any violent, reckless or disorderly act, language, gestures, or conduct	34	1.11%
Unexcused absences; tardy	27	0.88%
Using offensive, demeaning, or degrading remarks, comments, statements, or taking actions based on another's race, color, religion, national origin, sex, age, disability, sexual orientation, parental status	26	0.85%
Driving a privately owned vehicle, off duty, while intoxicated or under the influence of alcohol, drugs, or other intoxicants	23	0.75%
Making misstatement or misrepresentation with the intent to mislead including material and/or intentional falsification, concealment, omission of fact; forgery	20	0.65%
Inappropriate and/or unwelcome verbal or physical conduct of a sexual nature	18	0.59%
Inattention to duty, where there is a potential danger to human life, property, or revenue, or damage/injury/loss actually occurs	16	0.52%
Victim Cases ²	15	0.49%
Office of Workers Compensation Programs	14	0.46%
Duty status tracking ³	12	0.39%
Willful misuse of (or authorizing the misuse of) any government-owned or -leased passenger vehicle (including aircraft and seagoing vessel); authorizing the use of government vehicle for other than official purposes	12	0.39%
Unauthorized personal use of government computers, software systems, fax machines,	11	0.36%

¹ Incidents without distinct allegation codes.

² Generally incidents where an employee is assaulted or robbed.

³ Tracks employees on administrative leave for issues unrelated to an ITR.



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telephones, copiers, etc.		
Use of position or authority for other than official purposes	11	0.36%
Using government property, property under government custody, or the property of others, other than as authorized or for other than official purposes	10	0.33%
Time and attendance fraud	10	0.33%
Positive alcohol test while on duty	10	0.33%
Unauthorized use or misuse of law enforcement equipment, resources	10	0.33%
Violation of security procedures covering information, documents, records, or other material that is classified or SSI	10	0.33%
Inattention to duty where there is no potential danger to life or property or potential loss of revenue	10	0.33%
AWOL for a period of more than 5 workdays	9	0.29%
Unauthorized use, removal, or possession of a thing of value belonging to another employee or private citizen; colluding with others to commit such acts	8	0.26%
Unauthorized disclosure of PII or other materials covered by the Privacy Act	8	0.26%
Violation of the duty to abstain from consuming or being under the influence of alcohol prior to performance of security-related functions	7	0.23%
Unauthorized or illegal possession of a weapon or ammunition	7	0.23%
Misuse of government identification, including badges and/or credentials	7	0.23%
Unauthorized disclosure of information, documents, records, or other material that is classified or SSI	7	0.23%
Unnecessary discharge of a weapon where there is apparent danger to human life – intentional	6	0.20%
Fraudulent or abusive use of a Government charge card or travel card	6	0.20%



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Unnecessary discharge of a weapon where there is no apparent danger to human life – unintentional	5	0.16%
Consuming alcohol or medication, prescribed and over-the-counter; which impairs judgment/ability to safely use and control a firearm. Applies to when carrying a TSA-issued firearm, on or off duty	5	0.16%
Acting or failing to act on an official matter in a manner which improperly takes into consideration an individual's membership in a protected group; taking retaliatory action against an individual involved in the EEO complaint process; failing to take appropriate action to prevent or curtail prohibited discrimination or harassment of a subordinate when the supervisory employee knew or should have known the conduct was discriminatory	5	0.16%
Unnecessary discharge of a weapon where there is apparent danger to human life - unintentional	4	0.13%
Use of public office for private gain	4	0.13%
Improper or negligent operation of government owned or leased property	4	0.13%
Lack of candor	4	0.13%
Violation of local traffic laws of any state or political subdivision while operating a government-owned or leased vehicle	3	0.10%
Improper use of sick leave or other leave programs	3	0.10%
Inappropriate display of a weapon or ammunition	3	0.10%
Negligent or careless performance of duties; including inspection, investigation, or other enforcement function	3	0.10%
Unauthorized consumption of alcoholic beverages while on duty or on government-owned or leased property (including vehicles)	3	0.10%
Endangering the safety of, or causing injury to, any person through carelessness or failure to follow instructions	3	0.10%



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Performance issue tracking ⁴	2	0.07%
Unauthorized recording or monitoring of phone calls, conversations, meetings, electronic communications, etc.	2	0.07%
AWOL from than 1 to 5 workdays	2	0.07%
Engaging in prohibited outside employment	2	0.07%
Failure to promptly report one's own arrest to superiors and/or appropriate investigative office	2	0.07%
Concealing or failing to report, missing, lost, or damaged, government property or funds or property or funds in the government's custody or care	2	0.07%
Failure to follow Standard Operating Procedures	2	0.07%
Refusing or failing to submit to, or interfering with a TSA-ordered drug or alcohol test	1	0.03%
Background investigation ⁵	1	0.03%
Any knowing, willful, or negligent action that could reasonably be expected to result in an unauthorized disclosure of classified information	1	0.03%
Positive drug test or admission of illegal drug use	1	0.03%
Interfering with an official inquiry, investigation, or administrative or adjudicatory proceeding.	1	0.03%
Unnecessary discharge of a weapon where there is no apparent danger to human life – intentional	1	0.03%
Any other incident in which classified information is not safeguarded or handled in accordance with prescribed procedures	1	0.03%
Sleeping while engaged in security duties	1	0.03%
Any incident involving computer or telecommunications equipment or media that	1	0.03%

⁴ Documents performance issues.

⁵ Tracks background investigation issues.



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may result in disclosure of classified information to unauthorized individuals, or that results in unauthorized modification or destruction of classified system data, loss of classified computer system processing capability, or loss or theft of classified computer system media		
Careless and/or negligent handling of PII, or other materials covered by the Privacy Act	1	0.03%
Failure to observe and/or enforce safety and health regulations, rules, signs, and instructions, or to perform duties in a safe manner; failure to wear protective clothing and equipment, including vehicle safety restraints	1	0.03%
Failing or refusing to give oral or written statements, testimony, or otherwise failure to cooperate in connection with any official inquiry, investigation, or proceeding	1	0.03%
Knowingly and inappropriately associating with individuals or groups known to be connected with criminal activities	1	0.03%
Unauthorized canvassing, soliciting, or peddling at TSA or DHS worksite or while on duty	1	0.03%
Actual or attempted theft, or other unauthorized taking of funds or property owned or controlled by the Government; colluding with others to commit such acts	1	0.03%
Intentionally allowing persons or property to bypass required screening	1	0.03%
Total Number of Incident Categories: 79	3074	100.00%



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Appendix C
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