

U.S. International Trade Commission

Inspection of Physical Security



OIG-SP-11-12

September 9, 2011



Office of Inspector General

The U.S. International Trade Commission is an independent, nonpartisan, quasi-judicial federal agency that provides trade expertise to both the legislative and executive branches of government, determines the impact of imports on U.S. industries, and directs actions against certain unfair trade practices, such as patent, trademark, and copyright infringement. USITC analysts and economists investigate and publish reports on U.S. industries and the global trends that affect them. The agency also maintains and publishes the Harmonized Tariff Schedule of the United States.

Commissioners

*Deanna Tanner Okun, Chairman
Irving A. Williamson, Vice Chairman
Charlotte R. Lane
Daniel R. Pearson
Shara L. Aranoff
Dean A. Pinkert*

OFFICE OF INSPECTOR GENERAL



UNITED STATES INTERNATIONAL TRADE COMMISSION

WASHINGTON, DC 20436

September 9, 2011

OIG-JJ-012

Chairman Okun:

This memorandum transmits the Office of Inspector General's final report, *Inspection of Physical Security, OIG-SP-11-012*. In finalizing the report, we analyzed management's comments on our draft report and have included those comments in their entirety as Appendix A.

This report contains 22 recommendations over six subject areas. In the next 30 days, please provide me with your management decisions describing the specific actions that you will take to implement each recommendation.

Thank you for the courtesies extended to the inspector during this evaluation.

A handwritten signature in blue ink, reading "Philip M. Heneghan". The signature is written in a cursive style and is contained within a thin black rectangular border.

Philip M. Heneghan
Inspector General

U.S. International Trade Commission
Inspection Report

Table of Contents

Physical Security Program and Results of Inspection..... 1

Subject Areas & Recommendations..... 2

 Subject Area 1: Vehicle inspection and parking garage security 2

 Subject Area 2: Perimeter Alarm/Intrusion Detection System and Kastle Key
 inventory 3

 Subject Area 3: FPS building security level determination 5

 Subject Area 4: Physical building security in the areas of communication, stairwell,
 and CCTV 5

 Subject Area 5: Liaison with local police and consistent communication with the
 FPS 7

 Subject Area 6: Employee training, written procedures, and guidance 8

Management Comments and Our Analysis..... 12

Objective, Scope, Methodology, Standards, and Relevant Documents 12

Appendix

 Appendix 1: Management Comments on Draft Report.....A

U.S. International Trade Commission
Inspection Report

(This page intentionally left blank.)

U.S. International Trade Commission

Inspection Report

Physical Security Program

The Commission's physical security program is not documented in a Commission Directive; however, it includes, but is not limited to physical building access including ingress, egress, and internal access to Commission space; on-site parking and garage space; perimeter security; guards; interior security; communication and liaison with local and federal security forces; and planning, education, and training.

Because the Commission does not have a formally documented physical security program of its own, the criteria against which the physical security program was inspected included government-wide accepted best practices.

The criteria were drawn from:

1. Federal Protective Service Building Security Assessments of USITC's building security December 22, 2004 and December 21, 2008
2. General Services Administration regulations pertaining to physical security
3. U.S. Department of Justice, "Vulnerability Assessment of Federal Facilities," June 28, 1995
4. USITC Directive 3050.0, "Emergency Recovery Contingency Plan," March 8, 1993
5. USITC Directive 3051.0, "Emergency Evacuation of the USITC," November 3, 1994
6. USITC Directive 1020.6, "Office of Administration," May 20, 2010
7. Security guard contract
8. Security guard Post Orders
9. Commission building lease

Results of Inspection

The objective of this Inspection was to determine whether the physical security program at USITC is sufficient as determined by (1) statutory and regulatory baselines and (2) agency need. The physical security program is not sufficient.

The Commission's Physical Security Program is not sufficient because weaknesses and deficiencies were identified in the areas of: (1) vehicle inspection and parking garage security; (2) the Perimeter Alarm/Intrusion Detection System and Kastle Key inventory; (3) FPS building security level determination; (4) physical building security in the areas of communication, stairwells, and CCTV; (5) liaison with local police and consistent communication with the Federal Protective Service (FPS); (6) and employee training, written procedures, and guidance. The lack of having a documented physical security program is itself a problem. In addition, past physical security reviews identified some of the same issues and they are still unresolved.

U.S. International Trade Commission

Inspection Report

Subject Areas & Recommendations

Subject Area 1:

Vehicle inspection and parking garage security

Weaknesses and deficiencies in the security of the garage area and vehicles coming into the parking area have been a concern since the Office of Inspector General review in 1996. There are no security cameras in the garage area, there are exceptions in the identification procedures used for entering vehicles, and vehicles are not thoroughly screened prior to entering the parking area.

Garage Security

In response to a survey question regarding garage security, management stated that “the parking attendant walks through the garage and reports suspicious activity.” While the parking attendant may occasionally walk through the parking garage, the parking attendant does not patrol the garage, the security guards do. The Captain of the guard force states that the roving guard patrols garage eight times a day, once an hour; however, there are no cameras in the garage therefore the garage is only monitored for a fraction of the time it is open and accessible.

Vehicle Security - Identification

The Paragon guard contract requires guards to exit the guard booth to verify identity. Based on in-person observation, this does not happen very often. Usually, the guard looks at the driver and may glance at the ID that is flashed for a second or two before the car drives into the garage. This does not meet the requirements in the contract.

In addition, the guard Post Orders require all drivers and passengers to show a valid government photo ID except for “assigned facility Judges and SES’s.” There is no reasoning or justification provided for this exception. When asked about it, the guard Captain explained that this exception had been in the Post Orders “for a while” and was based on a Commission request to deviate from the standard process.

Vehicle Security - Screening

According to the Post Orders, the guards are not required to conduct a trunk or undercarriage inspection of vehicles entering the parking area. The only requirement for a vehicle to enter the garage is that the driver and passengers display a federal identification¹. The Captain of the guards states that this is a weak security posture for the

¹ Pursuant to the Post Orders, a “visual inspection” of the interior” of the vehicle is required. According to the Captain of the guards, this is only to ensure that all passengers display federal identification and not to inspect for contraband or other threats.

U.S. International Trade Commission

Inspection Report

Commission and that, in addition to trunk and undercarriage inspection, a barrier should be placed in front of the garage entrance to ensure that vehicles do not bypass the guard booth and drive directly into the garage without verification. When management was asked about why the additional screening, which has been recommended since 1996, was not implemented the response was that “access is limited to employees and Federal ID card holders” only and because “employees can walk into the building without being screened.” Both statements are true; however, all parties acknowledge that more than USITC employees are parking in the garage and simply because a federal employee is parking in the garage does not mean that there are no threats in or on the vehicle about which the employee may or may not know.

Recommendation 1:

Add CCTV cameras to the garage area to ensure consistent monitoring.

Recommendation 2:

Eliminate the exception for Judges and SES employees and require all entrants into the garage, drivers and passengers, to display federal photo identification.

Recommendation 3:

Implement vehicle inspection procedures commensurate with the building security level.

Subject Area 2:

Perimeter Alarm/Intrusion Detection System and Kastle Key inventory

Since 2004, the Commission’s intrusion detection system (IDS) and Kastle Key system have been malfunctioning and sending multiple false alarms to FPS a month. There is no set Commission process for responding to an alarm and there is no functioning tracking system for establishing who should have a Kastle Key and what access is appropriate.

Intrusion Detection System False Alarms

Since 2004, the Commission’s alarm systems have been malfunctioning and triggering an average of 10 false alarms a month. When these alarms are triggered, a call goes to the FPS MegaCenter which dispatches FPS officers to respond to the alarm. The false alarms are costing the government money and time. Commission management and the guard force acknowledged the false alarms but, according to Commission management, the alarm vendor is not responsive to Commission requests for assistance.

U.S. International Trade Commission

Inspection Report

No process for responding to alarms

Three management officials and the Captain of the guards were asked about alarm response procedures and all gave a different account of how management would be notified. Some said that the alarm company would call the FPS MegaCenter directly; some said that the alarm company would call the Commission management officials listed as points of contact; some said that emails would be sent out; and some said a combination of all of the above. Based on these responses and a lack of written guidance--there is no clear process for how management is notified of an alarm. In addition, when the management points of contact were reviewed, two of the three people listed were incorrect listings. Finally, when management was asked what they are supposed to do if the alarm company contacted them, their responses were different, and no one knew what to do if the alarm company contacted them during an evening or weekend.

Kastle Key Inventory

Kastle Keys are how employees access the Commission from the outside and internally move around the building. According to Commission management, the Kastle Key inventory system is out of date and inaccurate. This lack of control creates a vulnerability for the Commission. The Kastle Key system must be accurate in order to determine who has physical access and that the access is appropriate.

Recommendation 4:

Review communication, testing, inspection, and repair clauses in the Kastle contract and require the vendor to comply.

Recommendation 5:

Set up a regular process to test the system for malfunctions.

Recommendation 6:

Develop a written alarm response process with third-party partners and test the process frequently.

Recommendation 7:

Conduct an internal review of the Kastle Key inventory system to ensure that appropriate access is provided.

U.S. International Trade Commission

Inspection Report

Subject Area 3:

FPS building security level determination

In 2008, FPS lowered the security threat level for the Commission building from a four to a three. The security threat level is determined by the Vulnerability Assessment of Federal Facilities established by the United States Marshall Service, June 28, 1995. The scale goes from one to five – one being the lowest threat and five being the highest.

Security Threat Rating

Since 2002, the FPS security threat level for the Commission building has been a four. A typical level four building has over 450 federal employees; is more than 150,000 square feet; has high-volume public contact; and the tenant agencies may include high-risk law enforcement and intelligence agencies, courts, judicial offices, and highly sensitive government records². The Alfred P. Murrah Federal Building in Oklahoma City fell into this category.

The FPS Inspector delivered the new lower threat level and an explanation in November, 2008 and the Commission never responded. During this inspection, management stated that they disagreed with the new lower rating and will contact FPS to discuss whether the new rating is appropriate for the Commission. According to FPS, their findings are only a recommendation and the final determination rests with the tenant.

Recommendation 8:

Contact FPS to discuss the new security threat rating and determine whether the new lower rating is appropriate for the Commission.

Subject Area 4:

Physical building security in the areas of communication, stairwell, and CCTV

Within the ITC, there is no building wide public address system to announce emergencies or evacuations and the security in the stairwells of the building is not sufficient. In addition, the CCTV system is in disrepair and the guards do not have access to the camera recordings.

² This information is taken from the Vulnerability Assessment of Federal Facilities established by the United States Marshall Service, June 28, 1995.

U.S. International Trade Commission

Inspection Report

Building Communication

In the event of an emergency or should an evacuation take place, there is no public address system to notify all employees on all floors of instructions or provide direction. In response to the inspection survey, management originally stated that the Commission phone system could be used as a public address system. After further questioning, management stated that it could not. According to the draft Commission COOP Plan, in lieu of voice announcements, messages would be sent to employees via email and voicemail. While this is one possibility, in the case of an emergency having employees dialing the phone or clicking through to Outlook seems unlikely. Further, according to the guard contract and their Post Orders, the guards are not responsible for evacuating the building.

Stairwell Safety

As a result of this inspection, both management and the guards acknowledged that the stairwells pose a security weakness. There are insufficient cameras in the stairwells and there is no Kastle Key reader from the stairwell in the parking garage into the building. According to the inspection survey, there are only three cameras in the stairwells. There are four stairwells that connect between all of the floors of the building, thus there are only three cameras for 28 access points to Commission space.

In addition to the lack of cameras, there are no Kastle Key readers on the access points from the garage to the stairwells. This means that anyone can access the stairwell and move to any of the upper floors of the building without having to first check in with the guard desk.

CCTV

The Commission's CCTV system is broken. In the area of real time monitoring, several cameras are malfunctioning and the monitor used by the guards at the front desk is not working. In the area of recording and review, the guards do not have access to the video room and have no way of ensuring that the cameras are recording or reviewing the tapes in the event of a security incident.

Recommendation 9:

Establish alternative public address solutions for Commission space.

Recommendation 10:

Install additional cameras to cover the stairwells.

Recommendation 11:

Install Kastle Key readers at stairwell points of entry from the garage.

U.S. International Trade Commission

Inspection Report

Recommendation 12:

Test the CCTV system, cameras and monitors, and fix broken equipment.

Recommendation 13:

Provide the guards with access to the CCTV recording room.

Subject Area 5:

Liaison with local police and consistent communication with the FPS

The Commission must have a strong contact with local law enforcement and FPS. This contact allows the Commission to ask questions and request information that impacts Commission employees. It also ensures that the Commission will receive information that relates to employee security.

Local Police Contact

Commission management and FPS have agreed that FPS provides the primary response to any security incidents occurring within the ITC building; however, it is still beneficial for Commission security personnel to have a liaison and regular communication with local law enforcement. For example, a security notice was distributed to other federal agencies located in the L'Enfant vicinity regarding crime in the area. The security message was never received by Commission security personnel. The security message was eventually distributed to Commission personnel three days later after an employee from one of those agencies forwarded the message to a Commission employee and that employee forwarded it to Commission security personnel. It is essential that Commission security personnel be included in any and all law enforcement communications that impact Commission employees.

FPS Contact

During the course of this inspection, multiple questions went unanswered due to the unresponsiveness of the Commission's FPS contact. Questions included results of surprise inspections and drills held by FPS; the types of scenarios tested by FPS; and training requirements set by FPS for the guard force. The Commission must be made aware of any weaknesses in the guard force or areas where ITC security personnel should focus with employee training and drills. FPS is the Commission's primary resource for physical security and they must respond to questions and requests for information.

U.S. International Trade Commission

Inspection Report

Recommendation 14:

Establish a liaison and regular communication with local law enforcement.

Recommendation 15:

Send a letter to FPS management regarding unresponsiveness of the FPS liaison and request better customer service.

Subject Area 6:

Employee training, written procedures, and guidance

The absence of employee training and a lack of written procedures and clear security guidance were identified in all areas. Everything from proper training for the mailroom personnel to identify suspicious packages to established procedures for VIP building access was missing. All aspects of security must be addressed for a strong security program to exist and employee training, procedures, and guidance are one of the easiest and lowest cost areas to strengthen.

Building rules and regulations

Commission security building rules and regulations are not posted in an easy to access location and in an easy to understand format. These must be posted so that visitors and employees are on notice of what is expected of them when they access the ITC building. They must also be easily accessible in case employees or visitors have questions regarding security practices.

Mailroom personnel training

It is unclear when or how mailroom personnel have been trained to properly identify and handle suspicious packages and mail. Commission management could not provide a consistent answer to this question which demonstrates a weakness in security. Further, management stated that “all mail and packages are x-rayed and visually inspected at the front lobby and loading dock” but could not describe what “visually inspected” meant or what it included. Suspicious mail and packages are a constant security threat and providing frequent training for mailroom employees is an easy way to strengthen this area of protection.

Drills and tests for employees and guards

Multiple questions were asked of Commission management and the guards regarding surprise drills run and tests delivered to the guards and employees. Due to the poor communication between the Commission and FPS as discussed above, the Commission has no documentation regarding surprise drills and tests FPS has run to check the

U.S. International Trade Commission

Inspection Report

adequacy of the guard force. Few, if any, drills have been run which include employees as participants. A fire drill was run last year involving Commission employees but no other scenarios, including emergency evacuation, shelter in place, lockdown, or medical emergencies, have been run. Further, in light of the guard force Post Orders which state, “[e]vacuating a building for fire, earthquake, natural disaster, bomb threat or a suspicious package is not the guard’s responsibility,” the Commission should run various scenario drills on a frequent basis to ensure that employees are aware of their responsibilities.

Basic security training for employees

The Commission has no materials and does not provide basic physical security training to employees. The training that is provided on an annual basis addresses Information Security only. According to the FPS standards of review, this is not an acceptable best practice. Like the discussion of posting building rules and regulations and holding employees drills above, basic security training for employees is a necessary part of a basic security program.

Documented security procedures

The Commission lacks basic documented physical security procedures such as VIP visitor access and the reporting of security incidents. When asked for the process for both of these scenarios, many different responses were provided, none of which were documented anywhere. In order to ensure uniform implementation of any procedure, it must be written down. The VIP visitor process is ad hoc depending on who is requesting the access and who the visitor is. This poses a significant security deficiency, particularly when the visitor is a non-US citizen. A written request and approval process should be in place and a log of these requests should be retained.

Similar to the VIP visitor process, the Commission lacks a documented procedure for employees reporting security incidents. Commission management and the Captain of the guard force all gave different definitions of “security incident” and could not provide a consistent process for Commission employees to follow if they wanted to report an incident. All employees must know what to report and to whom they should report any incidents they feel pose a threat to security.

Recommendation 16:

Update all Commission Directives relating to physical security.

Recommendation 17:

Post building rules and regulations in an easy to access location and in an easy to understand format.

U.S. International Trade Commission

Inspection Report

Recommendation 18:

Provide regular training to mailroom personnel on identifying threatening or suspicious mail and packages.

Recommendation 19:

Conduct regular drills with employees and guards and document results; Drills will include emergency evacuation, shelter in place, lockdown, medical emergencies, and fire drills.

Recommendation 20:

Develop materials and identify a date to implement basic physical security training for Commission employees.

Recommendation 21:

Review all physical security responsibilities and existing written policies and procedures and create or update them to accurately reflect roles and responsibilities.

Recommendation 22:

Document VIP visitor access and the reporting of security incidents.

Past Reviews

The Commission's physical security program was inspected by the USITC Office of Inspector General in 1996 and again by the FPS in 2004 and 2008. Another FPS inspection is scheduled for December 2012.

The OIG's inspection in 1996 identified 13 problem areas. The FPS inspection in 2004 identified eight problem areas, two of which – loading dock access, and vehicle inspection - were identified previously in the 1996 inspection. Finally, the FPS inspection in 2008 identified five problem areas – the two listed above from the 1996 and 2004 inspections plus false alarms coming from the Perimeter Alarm/Intrusion Detection System (IDS), magnetometer location, and CCTV monitoring.

The following recommendations have been outstanding since 1996:

- Vehicle inspection for building parking lot; increased control over parking

The following recommendations have been outstanding since 2004:

- Vehicle inspection for building parking lot; increased control over parking

U.S. International Trade Commission

Inspection Report

- Perimeter Alarm/IDS false alarms

The following recommendations have been outstanding since 2008:

- Vehicle inspection for building parking lot; increased control over parking
- Perimeter Alarm/IDS false alarms

U.S. International Trade Commission

Inspection Report

Management Comments and Our Analysis

On August 29, 2011, Chairman Deanna Tanner Okun provided management comments to the draft inspection report. The Chairman agreed with our conclusion that the physical security program was not sufficient. She also noted that the Commission established a new Office of Security and Services and assigned an employee to serve as the Director of Security and Support services. Both actions will help the Commission address the six areas discussed in the report and establish a strong physical security program. The Chairman's response is provided in its entirety as Appendix A.

Objective, Scope, Methodology, Standards, and Relevant Documents

Objective:

The objective of this inspection is to determine whether the physical security program at USITC is sufficient as determined by (1) statutory and regulatory baselines and (2) agency need.

Scope:

The scope of this inspection is (1) the physical security program at USITC and (2) any other areas that support the physical security program

Methodology:

The methodology used during this inspection included (1) questionnaire, (2) in-person interviews, (3) in-person observation, (4) document review

Standards:

The inspection will be conducted in accordance with the CIGIE established "Quality Standards for Inspection and Evaluation."

Other Documents and Policies Reviewed During Inspection:

1. USITC Office of Inspector General Audit Report, "Review of Building Security," Report Number IG-02-86, April 1996
2. Commission Draft Occupant Emergency Plan, February 16, 2011
3. Guard training certificates
4. Commission COOP Plan, May 6, 2010
5. Commission security training materials

U.S. International Trade Commission

Appendix A

Chairman



UNITED STATES INTERNATIONAL TRADE COMMISSION

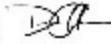
WASHINGTON, DC 20436

CO76-JJ-043

August 29, 2011

MEMORANDUM

TO: Philip M. Heneghan, Inspector General

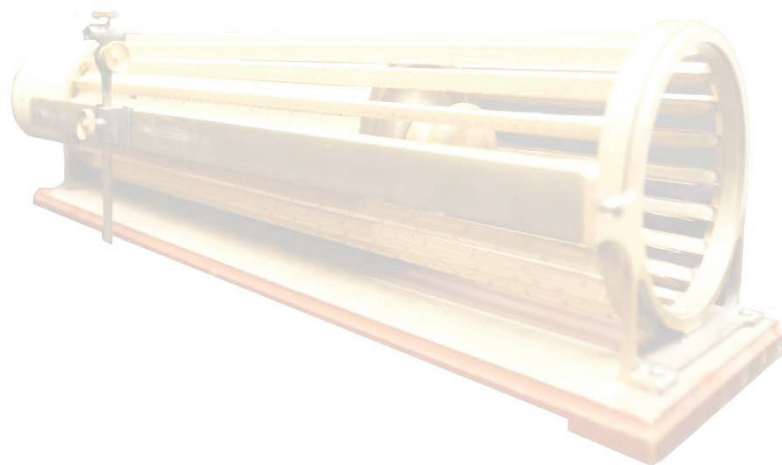
FROM: Deanna Tanner Okun, Chairman 

SUBJECT: Management Response to the Inspector General's Draft Inspection Report, "Inspection of Physical Security"

I am in receipt of the Inspector General's draft report, *Inspection of Physical Security*, dated July 29, 2011. I appreciate the opportunity to review the draft report and to provide comments.

The Inspector General's draft report focused on the Commission's physical security program including the guard force, emergency response procedures, and physical building access control. The report identified six problem areas, including the lack of having a documented physical security program. I concur with your assessment and appreciate that your office provided the Commission with a baseline. The Commission recently adopted a new management structure to address these weaknesses. On August 26, 2011, the Commission established a new Office of Security and Support Services, assigned an employee to serve as the Director of Security and Support Services, and approved the recruitment of the newly created position of Physical Security & Safety Officer. Through these actions, the Commission intends to establish a strong physical security program.

Thank you for reviewing the physical security program and making recommendations to strengthen its effectiveness.



“Thacher’s Calculating Instrument” developed by Edwin Thacher in the late 1870s. It is a cylindrical, rotating slide rule able to quickly perform complex mathematical calculations involving roots and powers quickly. The instrument was used by architects, engineers, and actuaries as a measuring device.

To Promote and Preserve the Efficiency, Effectiveness, and Integrity of the U.S. International Trade Commission



U.S. International Trade Commission
Office of Inspector General
500 E Street, SW
Washington, DC 20436

Office: 202-205-6542
Fax: 202-205-1859
Hotline: 877-358-8530
OIGHotline@USITC.gov