



Report to the Chairman, Subcommittee
on Oversight and Management
Efficiency, Committee on Homeland
Security, House of Representatives

September 2013

FEDERAL PROTECTIVE SERVICE

Challenges with Oversight of Contract Guard Program Still Exist, and Additional Management Controls Are Needed

GAO Highlights

Highlights of [GAO-13-694](#), a report to the Chairman of the Subcommittee on Oversight and Management Efficiency, Committee on Homeland Security, House of Representatives

Why GAO Did This Study

FPS relies on a privately contracted guard force (about 13,500 guards) to provide security to federal facilities under the custody and control of the General Services Administration. In 2010 and 2012, GAO reported that FPS faced challenges overseeing its contract guard program, specifically in ensuring guards' qualifications.

GAO was asked to update the status of FPS's contract guard oversight. This report examines (1) how FPS's requirements for contract guards compare to those of selected federal agencies and challenges, if any, that FPS faces in ensuring its requirements are met; (2) the extent to which guard companies have documented compliance with FPS's guard requirements; and (3) the management controls FPS uses to ensure compliance with its guard requirements. GAO reviewed 31 FPS guard contracts, and analyzed guard files from 11 contracts, selected based on geographic diversity; interviewed officials from guard companies, FPS headquarters, and 4 of 11 FPS regions; and reviewed the contract guard requirements and processes at six federal agencies, selected for their comparability to FPS.

What GAO Recommends

GAO recommends that the Secretary of DHS direct FPS to take immediate steps to determine which guards have not had screener or active-shooter scenario training and provide it to them; require that guard instructors be certified to teach basic and refresher training; and develop and implement guidance for selecting guard files and verifying the results. DHS concurred with GAO's recommendations.

View [GAO-13-694](#). For more information, contact Mark L. Goldstein at (202) 512-2834 or GoldsteinM@gao.gov.

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What GAO Found

Several of the Department of Homeland Security's (DHS) Federal Protective Service's (FPS) guard requirements are generally comparable to those of the six selected agencies GAO reviewed, but FPS faces challenges in some aspects of guards' training. FPS and the six selected agencies GAO reviewed require basic, firearms, and screener (x-ray and magnetometer equipment) training for their armed guards. However, GAO found that providing screener training remains a challenge for FPS. For example, officials from one of FPS's contract guard companies stated that 133 (about 38 percent) of its approximately 350 guards have never received this training. Similarly, according to officials at five guard companies, some of their contract guards have not received training on how to respond during incidents involving an active shooter. Additionally, while contract guard industry guidance states that all training should be done with a certified instructor, GAO found that FPS does not require guard instructors to be certified to provide basic and refresher training, which represents the majority of guards' training. According to six guard companies, the lack of a requirement has led to having to retrain some guards, potentially increasing costs to FPS.

Twenty-three percent of contract guard files GAO reviewed did not have required training and certification documentation. GAO reviewed 276 randomly selected (non-generalizable) guard files maintained by 11 of the 31 guard companies GAO interviewed and found that 212 files (77 percent) contained the required training and certification documentation, but 64 files (23 percent) were missing one or more required documents. For example, the 64 files were missing items such as documentation of initial weapons and screener training and firearms qualifications. Although FPS has taken steps to address its challenges in this area, GAO's previous recommendations concerning monitoring guard companies' performance are a guide to furthering FPS's efforts. According to FPS officials, it plans to address GAO's recommendations in the near future.

FPS continues to lack effective management controls to ensure its guards have met its training and certification requirements. For instance, although FPS agreed with GAO's 2010 and 2012 recommendations that it develop a comprehensive and reliable system for managing information on guards' training, certifications, and qualifications, it still does not have such a system. According to FPS officials, it plans to address this recommendation in the near future. FPS also lacks sufficient management controls to ensure consistency in its monthly guard file review process (its primary management control for ensuring that guards are trained and certified), raising questions about the utility of this process. In the absence of specific guidance regarding how files are to be selected, FPS's 11 regions varied in how they conducted the monthly file reviews. For example, FPS officials from three regions stated that they randomly select their files for review, while officials from one guard company in another region stated that FPS asks the guard company to select the files for review. Allowing contract guard company officials to select files for review by FPS could result in selection bias and affect the results of FPS's review. FPS also lacks guidance on reviewing and verifying the results of its guard-file reviews. Without such guidance, FPS may not be able to determine the accuracy of its monthly file review results or if its contract guard companies are complying with the guard training and certification requirements.

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Abbreviations

AED	automated external defibrillator
CALEA	Commission on Accreditation for Law Enforcement Agencies, Inc.
COR	Contracting Officer's Representative
CPR	cardiopulmonary resuscitation
DCJS	Virginia Department of Criminal Justice Services
DHS	Department of Homeland Security
DOE	Department of Energy
FLETA	Federal Law Enforcement Training Accreditation Board
FLETC	Federal Law Enforcement Training Center
FPS	Federal Protective Service
GSA	General Services Administration
ISC	Interagency Security Committee
NASA	National Aeronautics and Space Administration
NASCO	National Association of Security Companies
NPPD	National Protection and Programs Directorate
OPM	Office of Personnel Management
PFPA	Pentagon Force Protection Agency
PSO	Protective Security Officer
RAMP	Risk Assessment and Management Program
SGIM	Security Guard Information Manual

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September 17, 2013

The Honorable Jeff Duncan
Chairman
Subcommittee on Oversight and Management Efficiency
Committee on Homeland Security
House of Representatives

Dear Mr. Chairman:

The Department of Homeland Security's (DHS) Federal Protective Service (FPS) is the primary agency responsible for providing law enforcement and related security services for the approximately 9,600 federal facilities under the control and custody of the General Services Administration (GSA). These facilities house 1.1 million occupants and average 1.4 million visitors per day. To help accomplish the mission of protecting federal facilities, FPS obligated about \$767 million in fiscal year 2012 for contract guard companies to provide about 13,500 guards at over half of GSA's facilities.¹ In recent years, we have reported on the challenges FPS faces overseeing its contract guard program. Specifically, in August 2012, we reported that FPS had no centralized database to ensure that guards have completed required training and have the appropriate certifications and qualifications to be deployed at federal facilities.² In 2010, we reported that FPS's contract guard program required more oversight and that FPS should reassess its use of contract guards.³ We recommended, among other things, that FPS develop and implement a comprehensive guard management system capable of providing reliable, comprehensive data on its contract guard program on a real time basis, and that FPS provide guards with building-specific and scenario-based training and guidance. Our 2010 and 2012 reports contained 13 recommendations. DHS agreed with all of our

¹FPS refers to its contract security guards as Protective Security Officers (PSO). However, for the purposes of this report we use the term guard.

²GAO, *Federal Protective Service: Actions Needed to Assess Risk and Better Manage Contract Guards at Federal Facilities*, [GAO-12-739](#) (Washington, D.C.: August 2012).

³GAO, *Homeland Security: Federal Protective Service's Contract Guard Program Requires More Oversight and Reassessment of Use of Contract Guards*, [GAO-10-341](#) (Washington, D.C.: April 2010).

recommendations and is in the process of implementing two of them (see app. I for a list of recommendations and status).

You asked us to update the status of FPS's management of its contract guard program. This report provides information and analysis on (1) how FPS's guard training, certification, and qualification requirements for contract guards compare to those of other selected federal agencies and challenges, if any, that FPS faces in ensuring those requirements are met; (2) the extent to which FPS's guard companies have documented compliance with training and certification requirements; and (3) the management controls FPS and its guard companies use to ensure compliance with training, certification, and qualification requirements.

To determine FPS's training, certification, and qualification requirements for contract guards, we analyzed selected guard services contracts active as of September 2012 and FPS's Security Guard Information Manual. We drew a non-generalizable sample of 31 contracts from FPS's 117 guard services contracts (one contract for every guard company with which FPS has contracted for non-emergency guard services).⁴ Eleven of the 31 guard contracts were chosen based on geographic diversity and geographic density of contracts within FPS regions to allow us to conduct file reviews for multiple contracts during each of four site visits that we conducted. For each of these 11 contracts, we reviewed the contracts as well as a random sample of guard files associated with each contract. The remaining 20 guard services contracts we selected were the most recent contract for each of the remaining guard companies that FPS had contracted with as of November 2012. We also interviewed officials from each of the 31 contract guard companies and industry stakeholders, including the National Association of Security Companies (NASCO), the Commission on Accreditation for Law Enforcement Academies (CALEA), the Federal Law Enforcement Training Accreditation Board (FLETA), and the Department of Homeland Security's (DHS) Interagency Security Committee (ISC). To determine how FPS's requirements compare to those of other agencies that contract for guard services, we selected six federal agencies that contract for guard services and reviewed their requirements and processes for managing their contract guards.

⁴When we chose contracts for review, FPS had a total of 117 contracts with 32 guard companies. However, 1 of the 32 companies had a contract with FPS for only emergency guard services. As such, we chose 1 contract for review for each company with which FPS had contracted for non-emergency guard services as of November 2012.

Agencies were selected based on survey responses regarding use of contract guards for a previous GAO report⁵ and discussions with guard companies and industry stakeholders. Specifically, we reviewed policies and interviewed officials from the Department of Energy (DOE), the National Aeronautics and Space Administration (NASA), the Department of Defense's Pentagon Force Protection Agency (PFPA), the Department of State (State), the John F. Kennedy Center for the Performing Arts (Kennedy Center), and the U.S. Holocaust Memorial Museum (Holocaust Museum). Our findings from our review of these agencies' practices are not generalizable to other agencies that contract for guard services. However, the six agencies we selected are comparable to FPS because they also are responsible for protecting and providing guard services to a large number and wide variety of federal facilities such as public buildings and museums.

To determine the extent to which contract guard companies documented compliance with FPS's guard training and certification requirements, we examined documentation related to our non-generalizable sample of 11 contracts, as previously discussed. From these 11 contracts, we randomly selected 276 guard files to review for compliance with FPS requirements. For each guard file, we compared the file documents to a list of requirements contained in FPS's Administrative Audit and Protective Security Officer File Review Forms, which FPS uses to conduct its monthly guard file reviews.

To identify the management controls and processes FPS and the guard companies use to ensure compliance with training, certification, and qualification requirements, we reviewed FPS's procedures for (1) conducting monthly guard file reviews; (2) documenting compliance with guard training, certification, and qualification requirements; and (3) monitoring performance. We also visited 4 of FPS's 11 regions to discuss how regional officials ensure that guards are qualified to be deployed to federal facilities. We selected the 4 regions to provide geographic density of contracts in the region to facilitate reviews of guard files, diversity in the size of guard companies, and geographic diversity. During regional visits,

⁵GAO, *Facility Security: Greater Outreach by DHS on Standards and Management Practices Could Benefit Federal Agencies*, [GAO-13-222](#) (Washington, D.C.: January 2013) and GAO, *Facility Security: Results of GAO's Survey on the Physical Security of Federal Facilities*, an E-supplement to [GAO-13-222](#), [GAO-13-223SP](#) (Washington, D.C.: January 2013).

we interviewed FPS regional managers, contract guard program managers, contracting officers, contracting officer's representatives, and inspectors regarding oversight policies and practices and challenges to ensuring compliance with requirements. In addition, we interviewed officials from each of FPS's 31 guard companies regarding their policies and procedures for complying with FPS's guard training and certification requirements. While the results of our work are not generalizeable, about 40 percent of the GSA facilities with guards are located in the four regions where we conducted our site visits and our review of guard files involved 11 of FPS's 31 guard companies. To assess the extent to which FPS monthly guard file review results identified files with missing documentation of training, certifications, and qualifications, we compared FPS's monthly file review results from the month in which we conducted our file review for each of the 11 contracts to identify guard files that were included in both our review and FPS's monthly review. We identified any discrepancies between the reviews and used FPS's file review forms to examine the discrepancies.

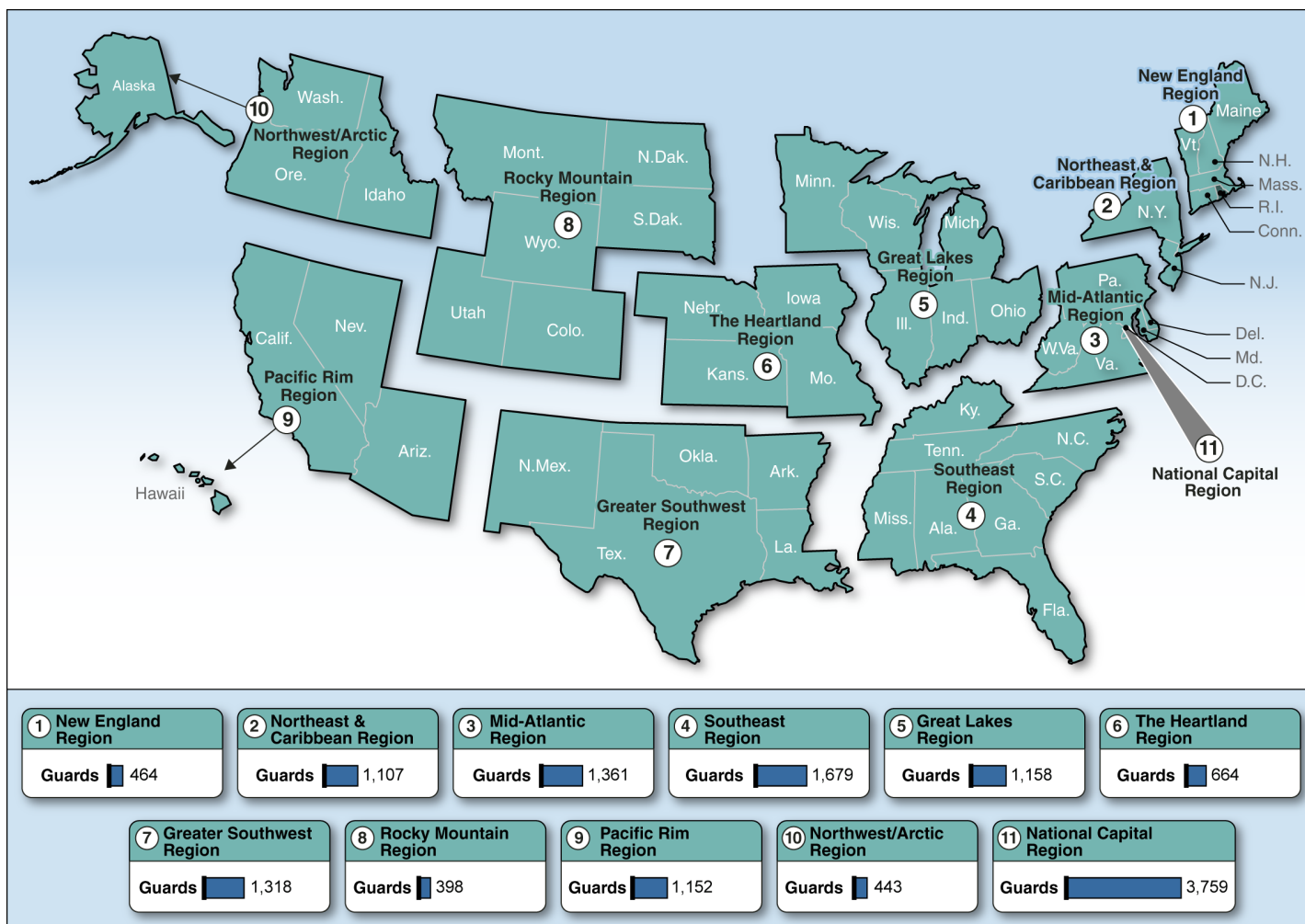
We conducted this performance audit from August 2012 through September 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

FPS is responsible for protecting federal employees and visitors in approximately 9,600 federal facilities under the custody and control of GSA. The level of security FPS provides at each of the facilities (including whether guards are deployed) varies depending on the building's facility security level.

To fund its operations, FPS charges fees for its security services to federal tenant agencies in GSA-controlled facilities. For fiscal year 2013, FPS expects to receive \$1.3 billion in fees. FPS has about 1,200 full-time employees and about 13,500 contract security guards deployed at approximately 5,650 (generally level III and IV facilities) of GSA's 9,600 facilities. Figure 1 shows the location of FPS's 11 regions and the approximate number of guards serving under contracts in each of these regions.

Figure 1: Number of FPS Contract Guards, by Region, as of September 2012



Sources: GAO analysis of FPS data; Map Resources (map).

Note: The number of guards in each region could fluctuate daily depending on contract guard company personnel changes (i.e.: hiring and firing, added services, etc). Our figure shows the approximate number of guards (13,503), as of September 2012.

FPS's contract guard program is the most visible component of the agency's operations, and the agency relies on its guards to be its "eyes and ears" while performing their duties. Contract guards are responsible for controlling access to facilities; conducting screening at access points to prevent the introduction of prohibited items, such as weapons and explosives; enforcing property rules and regulations; detecting and reporting criminal acts; and responding to emergency situations involving facility safety and security. In general, guards may only detain, not arrest,

individuals, and guards' authorities typically do not extend beyond the facility. However some guards may have arrest authority under conditions set forth by the individual states.

According to FPS's contract for guard service, its private-sector contract guard companies have primary responsibility for training and ensuring that guards have met certification and qualification requirements; however, FPS is ultimately responsible for oversight of the guards. FPS relies on its Contracting Officer Representatives (COR) and inspectors located in its 11 regions to inspect guard posts and verify that training, certifications, and time cards are accurate, among other responsibilities.⁶ CORs are individuals appointed by the contracting officer to assist in the monitoring or administration of a contract including monitoring contractor performance, receiving reports and other documentation, performing inspections, and maintaining contact with both the contract guard company and the contracting officer.⁷ FPS's contractors are responsible for providing and maintaining all guard services as described in the contract statement of work, including management, supervision, training, equipment, supplies, and licensing.

⁶FPS inspectors monitor the security posture of federal facilities by responding to incidents, testing countermeasures, and conducting guard post inspections.

⁷FPS guard services are acquired through competitive 5-year indefinite-delivery, indefinite-quantity contracts or blanket purchase agreements, consisting of a 1-year base period and four 1-year renewal option periods.

Several of FPS's Guard Requirements Are Generally Comparable to Selected Agencies, but FPS Faces Challenges in Other Aspects of Guards' Training

FPS Has Several Guard Training Requirements That Are Generally Comparable to Other Selected Agencies

Before guards are assigned to a post or an area of responsibility at a federal facility, FPS requires that they all have contractor employee fitness determinations (the employee's fitness to work on behalf of the government based on character and conduct) and complete approximately 120 hours of training provided by the contractor and FPS, including basic training, firearms training, and screener (X-ray and magnetometer) training. Guards must also pass an FPS-administered written examination and possess the necessary certificates, licenses, and permits as required by the contract. Additionally, FPS requires its guards to complete 40 hours of refresher training every 3 years. Some states and localities require that guards obtain additional training and certifications.⁸ See table 1 for a detailed list of FPS's guard training, certification, and qualification requirements.

⁸FPS requires that guards comply with state and local requirements for armed security personnel. For example, armed guards providing services in Virginia must successfully complete registration and training requirements set by the Virginia Department of Criminal Justice Services (DCJS), including firearms endorsement, prior to being deployed in the state.

Table 1: FPS Contract Guard Requirements, as of October 2011

Requirement	Description
Background investigation/contractor employee fitness determination	Background checks conducted by FPS and the Office of Personnel Management (OPM), as well as documentation for guard files including: contractor employee's fitness-determination letter, ^a pre-employment drug screening, copy of driver's license or state identification, Domestic Violence Declaration Form ("Lautenberg Form") which certifies that guards have not been convicted of a crime of domestic violence, medical certification, and verified alien/immigration status. Fitness determinations are required every 5 years.
Basic training	Guards are required to complete a 64-hour training course provided by the contract guard company or a third party at the time of hiring. This training is based on the FPS Security Guard Information Manual (SGIM), which describes the guard's roles and responsibilities. Subject areas include: ethics, public relations, search and seizure, crime scene detection, access control, and crime detection and response, among other things.
Initial weapons training	Guards receive 40 hours of Basic Weapons Training provided by the contract guard company or a third party at the time of hiring. Prior to being deployed, guards are required to receive a qualifying score for each weapon associated with the contract or specific post requirement.
FPS screener training	Guards take an 8-hour Initial Screener (i.e., x-ray and magnetometer equipment) training provided by FPS at the time of hiring. Some newer contracts require guards to undergo 8-hours of annual refresher training.
FPS orientation	Guards take an 8-hour DHS orientation training provided by FPS at the time of hiring. Topics include: rules and regulations, report writing, bomb threats and natural disaster responses, as well as training on special situations, such as handling an active shooter or workplace violence situation.
Firearms qualifications	Guards are required to successfully complete prescribed course of firearms training, provided by the contractor or a third party but witnessed by FPS, and achieve a minimum score for a firearms performance qualification test at a range. Qualifications are required semi-annually.
Baton certification	Guards take a 4-hour training class on how to use a baton. This training is provided by the contract guard company or a third party on an annual basis.
Oleoresin Capsicum spray certification	Guards take a 4-hour training class on how to use Oleoresin Capsicum spray (commonly referred to as "OC Spray" or pepper spray). This training is provided by the contract guard company or a third party on an annual basis.
State and local permits	Some states and localities require weapons permits and/or security officer certifications, which may include additional required training. Requirements and frequency of renewal are determined by the state or locality.
CPR certification	Guards are required to complete training and receive certification. Training is provided by the contract guard company or a third party and frequency is determined by the certifying body (e.g., the American Heart Association or American Red Cross).
AED certification	Guards are required to complete training and receive certification on how to use an automated external defibrillator (AED, a device used for restoring a regular heart rhythm during cardiac arrest). This training is provided by the contract guard company or a third party and frequency is determined by the certifying body (e.g., the American Heart Association or American Red Cross).
First-aid certification	Guards are required to complete first-aid training and receive certification. This training is provided by the contract guard company or a third party and frequency is determined by the certifying body (e.g., the American Heart Association or American Red Cross).
Refresher training	Guards are required to complete a 40-hour refresher training course. This training is provided by the contract guard company or a third party triennially. This training is generally a refresher of basic training and may also include screener refresher training.

Source: GAO analysis of FPS guard service contracts.

^aA contractor employee's fitness determination is based on the employee's suitability for work for or on behalf of the government based on character and conduct.

We found similarities in the ways that FPS and six federal agencies we reviewed ensure that contract guards have received required training, certifications, and qualifications. Similar to FPS, each of the six agencies we examined—DOE, NASA, PFFA, State, the Kennedy Center, and the Holocaust Museum—depend largely on the contract guard companies to ensure guards are trained, certified, and qualified. They also depend on the guard companies to document compliance with contract requirements. All six agencies and FPS require basic, firearms, and screener (x-ray and magnetometer) training for their armed guards. In addition, FPS and five of the six agencies we reviewed require refresher training.

FPS Continues to Face Challenges in Some Aspects of Guards' Training

FPS Is Not Providing Required Screener Training to All Guards

FPS continues to experience difficulty providing required screener (x-ray and magnetometer equipment) training to all guards. In 2009 and 2010, we reported that FPS had not provided screener training to 1,500 contract guards in one FPS region.⁹ In response to our reports, FPS stated that it planned to implement a program to train its inspectors to provide screener training to all of its contract guards.¹⁰ Under this program, FPS planned to first provide x-ray and magnetometer training to its inspectors who would subsequently be responsible for training the guards. However, FPS continues to have guards deployed to federal facilities without this training.

As noted in table 1, FPS requires all guards to receive 8 hours of initial screener training provided by FPS. Screener training is important because guards control access points at federal facilities and thus must be able to properly operate x-ray and magnetometer machines and understand their results. However, 3 years after our 2010 report, guards

⁹GAO, *Homeland Security: Federal Protective Service Has Taken Some Initial Steps to Address Its Challenges, but Vulnerabilities Still Exist*, [GAO-09-1047T](#) (Washington, D.C.: Sept. 23, 2009) and [GAO-10-341](#).

¹⁰[GAO-10-341](#).

are deployed to federal facilities who have never received this training. For example, an official at one contract guard company stated that 133 of its approximately 350 guards (about 38 percent) on three separate FPS contracts (awarded in 2009) have never received their initial x-ray and magnetometer training from FPS. The official stated that some of these guards are working at screening posts without having received the training. Further, officials at another guard company in a different FPS region stated that, according to their records, 78 of 295 guards (about 26 percent) deployed under their contract have never received FPS's x-ray and magnetometer training. These officials stated that FPS's regional officials were informed of the problem, but allowed guards to continue to work under this contract, despite not having completed required training. Because FPS is responsible for this training, according to guard company officials, no action was taken against the company. In May 2013, FPS headquarters officials stated that they were unaware of any regions in which guards had not received screener training.

In July 2013, according to FPS officials, the agency began designing a "train-the-trainer" pilot program with four guard companies. Through this pilot program, contract guard company instructors, in addition to FPS inspectors, will be certified to provide screener training to guards. FPS officials stated that they plan to implement the pilot program in the first quarter of 2014. According to FPS officials, once implemented, FPS's train-the-trainer program should increase the number of certified instructors capable of providing screener training nationwide. If this program is fully implemented, FPS screener training could be provided largely by the guard companies. This is the method by which four of the six agencies we spoke with provide their guards with screener training. In addition, officials from 13 of the 31 guard companies that we interviewed stated that responsibility for x-ray and magnetometer training should be shifted to the guard companies to alleviate scheduling problems, while officials from 7 companies stated that FPS should retain this responsibility. The remaining 11 guard companies did not state an opinion on this issue. FPS's train-the-trainer program could provide resources to address the challenges it faces in providing screener training to guards. However, the program is in its beginning stages and there are still guards deployed to federal facilities who have not received required screener training. Screener training is essential to helping prevent unauthorized individuals and items from entering federal facilities. Thus, it is critical that FPS immediately provide this training to those guards who have not received it.

Some FPS Guards Have Not Received Training on How to Respond to an Active-Shooter Scenario

According to FPS officials, the agency requires its guards to receive training on how to respond to an active-shooter scenario, but we found that some guards have not received it. According to DHS, an active shooter is an individual killing or attempting to kill people in a confined and populated area. Since June 2009 there have been several incidents involving active-shooters at government facilities. For instance, in 2010 an active-shooter opened fire in the Lloyd D. George Federal Courthouse in Las Vegas, Nevada, killing a security officer and wounding a deputy U.S. Marshal.

According to FPS officials, since 2010, it has provided training on how guards should respond during an active-shooter incident to guards as part of the 8-hour FPS-provided orientation training guards receive. FPS officials were not able to specify how much time is devoted to this training, but said that it is a small portion of the 2-hour special situations training.¹¹ In addition, officials stated that guards hired before 2010 should have received this information during guard-company-provided training on the guards' post orders (which outline the duties and responsibilities associated with each guard post and include information on responding to an active-shooter situation) during basic and refresher training.

However, when we asked contract guard company officials if their guards had received training on how guards should respond during active-shooter incidents, responses varied. For example, of the 16 contract guard companies we interviewed about this topic:

- eight contract guard company officials stated that their guards have received active-shooter scenario training during orientation,
- five guard company officials stated that FPS has not provided active-shooter scenario training to their guards, and
- three guard companies stated that FPS had not provided active-shooter scenario training to their guards during the FPS-provided orientation training, but that the topic was covered in one of the following ways:

¹¹This training is provided during a block of training on special situations, which includes information on how guards should respond to situations other than their normal duties, such as reports of missing or abducted children, bomb threats, and active-shooter scenarios.

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- during guard company-provided basic training or refresher training,
 - FPS provided on-the-job instruction on the topic during post inspections, and
 - FPS provided a link to an active-shooter training video, which the company shows its guards.

The six agencies we reviewed—State, the Holocaust Museum, NASA, PFPA, the Kennedy Center, and DOE—also recognize this threat and five of them require active-shooter response training for their contract guards. According to officials at DOE, the agency is in the process of requiring guards to complete active-shooter response training to ensure they are capable of addressing this threat and protecting facility occupants. Similarly, Holocaust Museum officials stated that they require this training because current trends in law enforcement warrant active-shooter response training for guards.

In May 2013, an FPS official stated that the agency is collaborating with its guard companies to develop a standardized national lesson plan for guards and revising the Security Guard Information Manual (SGIM). FPS officials stated that the lesson plan being developed is meant to standardize the training guards receive. However, according to the official, FPS has not yet decided whether the national lesson plan will specify countermeasures necessary to mitigate threats from active shooters. FPS does not have a timeline for developing or implementing a national lesson plan for guards. Until it develops one, some guards may continue to go without training on how guards should respond to incidents at federal facilities involving an active shooter.

FPS Does Not Require Guard Instructors to Be Certified for Some Training Courses

FPS requires some contract guard company instructor certifications, but does not require guard company instructors to be certified to teach basic or refresher training or have any training in basic instructional techniques. According to ISC guidance, training is a critical component of developing a well-qualified guard force and all training should be done with a certified instructor or training organization.¹² Similarly, Federal Law Enforcement

¹²ISC, *Best Practices for Armed Security Officers in Federal Facilities*, April 2013, 2nd Edition.

Training Accreditation Board (FLETA)¹³ standards require that accredited training programs have an instructor development course and review process to ensure that instructors provide consistent, quality instruction. FPS requires that guard instructors be certified to provide training in CPR, first aid, AED, and firearms and have a minimum of 2 years of law enforcement, military, or security training experience. However, FPS has no certification requirements for instructors teaching the guards' basic and refresher training, nor does FPS require instructors to be knowledgeable in instructional techniques. Basic training, which represents 64 hours of the initial 120 hours of training that guards receive, and the 40-hour refresher class cover topics included in the SGIM, such as access control and crime detection and response.

In contrast to FPS, three of the six selected agencies that we reviewed (NASA, DOE, and the Holocaust Museum) require guard instructors to attend instructor training or to be certified by the agency. For example, NASA requires contract guard company instructors to be certified by a NASA training academy. NASA stated that instructor certification requirements have reduced legal liabilities, ensured standardization of training, and led to greater efficiency of its training programs throughout the agency. Under NASA's instructor certification program, instructors must meet the following requirements, among others:

- completed training from the Federal Law Enforcement Training Center (FLETC);
- 2-week internship as a student instructor to observe and work with an established instructor, including an evaluation;
- physical fitness requirements;
- re-evaluation every 2 years to ensure instructors are effective and follow required lesson plans; and
- annual workshop for instructors on curriculum development.

¹³The Federal Law Enforcement Training Accreditation Board is an independent body of DHS that accredits and provides standards for federal law-enforcement training programs, including the Federal Law Enforcement Training Center (FLETC), which provides training to FPS Inspectors.

Similarly, DOE requires that in addition to specific certifications for the level of training they provide, instructors must complete a basic instructor training course and be evaluated for competency at least once every 36 months.

According to some of FPS's guard companies, the absence of an instructor certification requirement has affected the quality of training provided to some guards. For example, 6 of FPS's 31 contract guard companies stated that they have experienced problems related to training quality when taking over a contract from a previous guard company and employing guards who had worked for the previous company. The companies stated that they either retrained or did not hire guards who they believed had been inadequately trained by the previous company. In these situations, costs may be passed on to FPS via increased rates for guard services to account for the increased training costs to guard companies. Four of the 31 guard companies stated that they already have additional requirements or training for instructors. However, such additional requirements and training are on a company-by-company basis and do not necessarily conform to any standards. Sixteen of the guard companies and officials from FLETA and CALEA stated that FPS should standardize instructor training and certification requirements or require FPS certification for guard instructors. Such standardization would help ensure quality and consistency in the training received by guards providing protective services across GSA's federal buildings. FPS officials stated that FPS reviews each instructor's resume to ensure that instructors have the minimum qualifications necessary to provide guard instruction.

Twenty-three Percent of Contract Guard Files We Reviewed Did Not Have Required Training and Certification Documentation

Some contract guard files we reviewed did not contain all required documentation. We reviewed 276 randomly selected (non-generalizeable) guard files maintained by 11 of the 31 guard companies we interviewed and found that 212 files (77 percent) contained the required training and certification documentation, but 64 files (23 percent) were missing one or more required documents. See table 2 for information on the results of our review. These 64 files were maintained by 9 of the 11 companies. According to FPS's policies and contracts for guard service, each contract guard company must maintain a file for each guard to document that all FPS training, certification, and qualification requirements have been met and are current. We examined the files against the required training, certification, and qualification documentation listed by FPS on the forms it uses to conduct its monthly file reviews.

Table 2: Total Missing Documents Identified in 64 of 276 Guard Files GAO Reviewed

Requirement	Number of instances of each missing document
Copy of DL/State ID	1
Domestic Violence “Lautenberg” Form	1
Medical certification	1
Verified alien/immigration status	3
Current baton certification	3
Basic training	3
Firearms qualifications	3
First-aid certification	5
FPS screener training—8 hours	5
FPS orientation	8
Contractor employee fitness determination	12
CPR certification	12
AED certification	12
Refresher training	15
Pre-employment drug testing	16
Initial weapons training	17
Total	117^a

Source: GAO Analysis of contract guard company data.

^aSome of the 64 files that were not in compliance with requirements were missing more than one required document, for a total of 117 missing documents.

As shown in table 2, the 64 guard files were missing 117 total documents. For example:

- Three files were missing documentation of basic training, and 15 were missing documentation of refresher training, both of which cover the guards’ roles and responsibilities and duties such as access control.
- Five files were missing documentation of screener training, which as mentioned above, is meant to prepare guards to prevent prohibited items from being brought into federal facilities.
- Seventeen files were missing documentation of initial weapons training, which indicates guards have passed the 40-hour weapons training, including 32 hours of firearms training.

-
- One file was missing the form that certifies that a guard has not been convicted of a crime of domestic violence.

In addition to the 117 missing documents, there was no indication that FPS had monitored firearms qualifications in 68 of the 276 guard files reviewed. The other 208 files had a current firearms qualification form with an indication (such as initials or a signature) that FPS witnessed the qualification. The FPS Protective Security Officer (PSO) File Review Form lists documentation requirements as “Firearms Qualifications Witnessed by an FPS Employee,” but is not clear regarding whether documentation of the FPS witness is required in the file. Although FPS has taken some steps to address its challenges in this area, our previous recommendations are a guide to furthering its efforts. For example, we recommended that FPS rigorously and consistently monitor contract guard companies’ performance and step up enforcement against guard companies that are not complying with the terms of the contract. Although FPS agreed with this recommendation, it has yet to implement it. According to FPS officials, it plans to address this recommendation in the near future.

FPS Still Lacks Effective Management Controls to Ensure Guards Have Met Training and Certification Requirements

FPS Continues to Lack a Comprehensive System to Effectively Manage Guard Training, Certification, and Qualification Data

DHS agreed with our 2010 and 2012 recommendations to develop a comprehensive and reliable system for contract guard oversight, but it still does not have such a system. Without a comprehensive guard management system, FPS has no independent means of ensuring that its contract guard companies have met contract requirements, such as providing qualified guards to federal facilities. According to FPS officials, it plans to address this recommendation in the near future. GAO’s Standards for Internal Control in the Federal Government also states that program managers need access to data on agency operations to

determine whether they are meeting goals for the effective and efficient use of resources. The standards state that such information should be captured and distributed in a form that permits officials to perform their duties efficiently.¹⁴

In the absence of a comprehensive guard-data-management system, FPS requires its guard companies to maintain files containing guard training and certification information and to submit a monthly report with this information to their CORs. FPS headquarters officials stated that the monthly reports are primarily to ensure that regional managers have access to training and certification information, although there are no requirements for regional officials to use or analyze the monthly reports. The officials stated that regions are occasionally asked to supply these reports to FPS headquarters as a check to ensure regions and guard companies are sharing this information, but that headquarters officials do not analyze the data.

Although FPS does not have a system to track guard data, 13 of FPS's 31 guard companies maintain training, certification, and qualification data in either proprietary or commercially available software programs with various management capabilities. For example, one system used by multiple companies tracks the training and certification status of each guard and prevents the company from scheduling the guard to work if the guard is not in compliance with requirements. Virginia's Department of Criminal Justice Services (DCJS) has a database system that also allows training academies, guards, and guard companies to upload training and certification documentation so that DCJS can track the training and certification status of guards. According to industry stakeholders and contract guard company officials, a comprehensive guard management system could:

- provide FPS direct access for updating guard training, certification, and qualification data while performing post inspections and other oversight activities such as file reviews;
- enable FPS and guard company officials to more easily develop reports and identify trends in data to recognize areas that need attention;

¹⁴GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999).

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- store training, certification, and qualification documentation, that could reduce the need to obtain documentation from a prior guard company when a new company takes over a contract; and
 - help identify guards working under more than one FPS contract and verify that they do not work more than the maximum of 12 hours in one day.

FPS Management Controls Do Not Ensure Consistency in Monthly File Review Process

FPS's monthly reviews of contract guard companies' guard files are its primary management control for ensuring that the companies are complying with contractual requirements for guards' training, certification, and qualifications. FPS's directive for monthly file reviews requires, for example, that:

- Ten percent of the guard files for each contract are to be selected randomly for the monthly review.
- Selected files should be compared to the data in the reports provided to FPS by the contract guard company that month.
- FPS reviewers must note any deficiencies in which the file documentation and dates do not match the data included in the monthly report and promptly notify the guard company, COR, and FPS regional program manager of the deficiencies.
- If there are deficiencies in 40 percent or more of the reviewed files, the region must immediately initiate an audit of 100 percent of the company's guard files.
- Results should be recorded in FPS's Administrative Audit Form and individual Protective Security Officer File Review Forms.
- An effort should be made to exclude files that have been reviewed within the last 6 months from the selection process.

FPS's directive on its monthly file reviews does not include specific information about the importance of randomly selecting guard files and ensuring contract guard company personnel do not know which files will be reviewed. In the absence of specific guidance regarding how files are to be selected, the four regions we visited varied in how they conducted the monthly file reviews. For example, three of the four regions we visited told us that they review randomly selected files either at the guard company's office or the guard company gives them electronic access to

the files for review. In contrast, officials in the fourth FPS region stated that they submit a list of the selected guard files to the guard company 24 to 48 hours before the file review and request that the files be delivered either electronically or in hard copy to the regional office. As such, contract guard company officials in that region stated that they can review the selected files to ensure that they comply with requirements prior to delivering them to FPS. FPS headquarters officials stated that this indicates that guard company officials are performing due diligence to ensure the file is up to date. However, this practice decreases the utility of randomly selecting files for review and reduces the ability of FPS reviewers to accurately assess the guard company's ongoing ability to keep all of its guard files up to date. Additionally, officials at a contract guard company in another FPS region stated that the COR occasionally asks the guard company to select the files for review and bring them to the regional office. FPS stated that this is not standard practice. Allowing contract guard company officials to select files for review by FPS could result in selection bias and affect the results of FPS's review.

FPS headquarters officials stated that monthly file review results are reported to headquarters and that the data are combined into a spreadsheet, summarizing the number of deficiencies by contract, region, and nationally. Officials stated that these data are used to identify possible trends in vendor documentation and to determine if corrective actions need to be taken at the regional level. However, if file review results are affected by selection bias or by guard company actions to alter the contents of the files selected for review, these data may not lead to an accurate understanding of trends or the need for corrective action.

FPS Lacks Guidance on Reviewing and Verifying File Review Results

The Government Performance and Results Act Modernization Act of 2010 requires agencies to develop an approach to validation and verification in order to assess the reliability of performance data.¹⁵ However, FPS's directive regarding monthly file reviews, discussed above, does not include requirements for reviewing and verifying the results of the file reviews. From March 2012 through March 2013, FPS reviewed more than 23,000 guard files as part of its monthly review process. FPS found that a majority of the guard files had the required documentation but more than 800 (about 3 percent) did not. FPS's file reviews for that period showed

¹⁵ Pub. L. No. 111-352, §3, 124 Stat. 3866, 3867 (Jan. 4, 2011).

files missing, for example, documentation of screener training, initial weapons training, CPR certification, and firearms qualifications. However, without an approach to reviewing and verifying results, FPS is not able to use these results to accurately assess the performance of its contract guard companies in complying with training and certification requirements.

As part of its monthly file reviews for November 2012 through March 2013, FPS reviewed some of the same guard files we examined, but our results differed substantially from what FPS found. Specifically, we compared the results of FPS's file reviews for the 11 contracts for which we conducted file reviews; we found that 29 of the 276 files we reviewed had also been reviewed by FPS. FPS's review and our examination of each file occurred in the same month. For each of the 29 files, FPS did not identify any missing documentation. In contrast, we found that 6 of the 29 files did not have the required training and certification documentation (and some were missing more than one required document). In 4 of the 6 guard files, FPS's review indicated that required documentation was present, but we were not able to find documentation of training and certification, such as initial weapons training, DHS orientation, and pre-employment drug screenings. We also identified files with expired documentation. For example, 2 of the 6 files had expired refresher-training documentation and another guard file had expired firearms qualification documentation. Since we used FPS's file review checklist to conduct our file review, it is unclear why the results differed. FPS officials were unsure about the reasons for this, but stated that human error and contract requirements that differ from the requirements listed on administrative audit forms may have been factors.

Additionally, differing results may be due to differences in the type of documentation accepted by GAO and FPS. For example, in our review of FPS monthly file review records for one contract, we identified 2 files for which, according to the PSO file review form, the FPS reviewer accepted documentation of CPR and AED training that we did not accept as valid. While FPS guard contracts require guard files to contain a copy of the CPR and AED certification card, the FPS reviewer accepted a roster of individuals who attended the training. However, the roster did not indicate whether attendees had passed the course or been officially certified and was not signed by an instructor.

FPS can take action against guard companies if it determines that a contract guard company has not complied with contractual requirements, but it may not have accurate information to do so. FPS's contracts for

guard services state that if guard companies do not comply with contract requirements (e.g., guard training, certification, and qualification requirements), FPS may require the contractor to take actions to ensure compliance in the future and also may reduce the contract price to reflect the reduced value of the service provided. Determining the extent to which FPS took actions against guard companies for not complying with guard training and certification requirements was not within the scope of our engagement. However, the results of our comparison of FPS's guard file reviews to our reviews raises questions about whether FPS has effective management controls in place to identify areas in which guard companies have not complied with requirements.

Conclusions

FPS continues to lack the management controls to ensure that its approximately 13,500 contract guards have the required training, certification, and qualifications, which are central to effectively protecting employees and visitors in federal facilities. FPS agreed with the recommendations in our 2010 and 2012 reports. We recommended, among other things, that FPS develop and implement a comprehensive system for guard oversight. Without such a system, among other things, FPS has no independent means of ensuring that its 13,500 guards deployed to federal facilities are properly trained and qualified. As such, we strongly encourage FPS to continue addressing the challenges we identified in our prior work and to be more proactive in managing its contract guard workforce. Although FPS has taken steps to address some of our prior recommendations, we found that FPS still has challenges providing screener training to some guards. Consequently, some guards deployed to federal facilities may be using x-ray and magnetometer equipment that they are not qualified to use. This raises questions about the capability of some guards to screen access control points at federal facilities—one of their primary responsibilities.

According to FPS officials, the agency has recently decided to make changes to its guard program, including developing a national lesson plan. We agree with this decision, given the problems that we have identified. A national lesson plan could help FPS standardize and ensure consistency in its training efforts. For example, without ensuring that all guards receive training on how to respond to incidents at federal facilities involving an active shooter, FPS has limited assurance that its guards are prepared for this threat. Similarly, the lack of certification requirements for instructors who teach basic and refresher training may ultimately affect guards' ability to perform their duties.

Finally, inconsistencies in how FPS regional officials conduct monthly file reviews (which are FPS's primary management control for ensuring compliance with the guard contract requirements) indicate that the current guidance for monthly file reviews is insufficient to ensure that, for instance, guard companies do not have the opportunity to select files for review and thus affect the results of the file reviews. Further, our work raises questions about the reliability and quality of FPS's monthly file reviews. These findings are of particular concern given that FPS continues to pay guard companies over half a billion dollars annually to provide qualified guards yet it appears that some guards have been deployed to federal facilities without meeting all of the training, certification, and qualification requirements.

Recommendations for Executive Action

To improve the management and oversight of FPS's contract guard program, we recommend that the Secretary of Homeland Security direct the Under Secretary of NPPD and the Director of FPS to take the following three actions:

- take immediate steps to determine which guards have not had screener or active-shooter scenario training and provide it to them and, as part of developing a national lesson plan, decide how and how often these trainings will be provided in the future
- require that contract guard companies' instructors be certified to teach basic and refresher training courses to guards and evaluate whether a standardized instructor certification process should be implemented; and
- develop and implement procedures for monthly guard-file reviews to ensure consistency in selecting files and verifying the results.

Agency Comments

We provided a draft of this report to DHS for review and comment. DHS concurred with our recommendations and provided written comments that are reprinted in appendix II. DHS also provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we will send copies of this report to appropriate congressional committees, the Secretary of Homeland Security, and other interested parties. In addition, the report will be available at no charge on GAO's web site at <http://www.gao.gov>.

If you have any questions about this report, please contact me at (202) 512-2834 or goldsteinm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'M. Goldstein', with a long, sweeping horizontal line extending to the right.

Mark L. Goldstein
Director, Physical Infrastructure Issues

Appendix I: Status of GAO's 2010 and 2012 Recommendations to the Department of Homeland Security's Federal Protective Service

Table 3: Status of GAO's 2010 and 2012 Recommendations to the Department of Homeland Security's Federal Protective Service

GAO Reports	Recommendations	Status
Homeland Security: Federal Protective Services Contract Guard Program Requires More Oversight and Reassessment of Use of Contract Guards, GAO-10-341 , April 2010	Identify other approaches and options that would be most beneficial and financially feasible for protecting federal facilities.	Not Implemented
	Rigorously and consistently monitor guard contractors' and guards' performance and step up enforcement against contractors that are not complying with the terms of the contract.	Not Implemented
	Complete all contract performance evaluations in accordance with FPS and Federal Acquisition Regulation requirements.	In process
	Issue a standardized record-keeping format to ensure that contract files have required documentation.	In process
	Develop a mechanism to routinely monitor guards at federal facilities outside metropolitan areas.	Not Implemented
	Provide building-specific and scenario-based training and guidance to its contract guards.	Not Implemented
	Develop and implement a management tool for ensuring that reliable, comprehensive data on the contract guard program are available on a real-time basis.	Not Implemented
Federal Protective Service: Actions Needed to Assess Risk and Better Manage Contract Guards at Federal Facilities, GAO-12-739 , August 2012.	Verify the accuracy of all guard certification and training data before entering them into RAMP, and periodically test the accuracy and reliability of RAMP data to ensure that FPS management has the information needed to effectively oversee its guard program.	Not Implemented
	Incorporate NIPP's risk management framework—specifically in calculating risk to include threat, vulnerability, and consequence information—in any permanent risk assessment tool.	Not Implemented
	Coordinate with GSA and other federal tenant agencies to reduce any unnecessary duplication in security assessments of facilities under the custody and control of GSA	Not Implemented
	Address MIST's limitations (assessing consequence, comparing risk across federal facilities, and measuring performance) to better assess and mitigate risk at federal facilities until a permanent system is developed and implemented.	Not Implemented
	Develop and implement a new comprehensive and reliable system for contract guard oversight.	Not Implemented
	Verify independently that FPS's contract guards are current on all training and certification requirements.	Not Implemented

Source: GAO.

Appendix II: Comments from the Department of Homeland Security

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



**Homeland
Security**

September 6, 2013

Mark L. Goldstein
Director, Physical Infrastructure Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Re: Draft Report GAO-13-694, "FEDERAL PROTECTIVE SERVICE: Challenges with Oversight of Contract Guard Program Still Exist and Additional Management Controls Are Needed"

Dear Mr. Goldstein:

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

The Department is pleased to note GAO found that training requirements for Federal Protective Service (FPS) contract guard staff, within DHS's National Protection and Programs Directorate (NPPD), were generally comparable to other selected agencies. DHS also appreciates GAO's positive acknowledgement and support of planned changes to the FPS guard program, including development of a national training lesson plan. FPS is committed to mitigating risks to Federal facilities and their occupants in a professional and cost-effective manner.

The draft report contained three recommendations, with which the Department concurs. Specifically, GAO recommended that the Secretary of the Department of Homeland Security direct the Under Secretary of NPPD and the Director of FPS to:

Recommendation 1: Take immediate steps to determine which guards have not had screener or active shooter response training and provide it to them and, as part of developing a national lesson plan, decide how and how often these trainings will be provided in the future.

Response: Concur. FPS has already begun a formal inquiry to all guard contract companies to provide FPS with a list of all current Protective Security Officer (PSOs) who may have not received the required government-provided screener training. From this list, FPS will prioritize the delivery of training for any gaps identified using a risk based approach, and will take action to ensure this training is completed in a timely manner. Additionally, FPS will continue to train PSOs to ensure such training is in compliance with FPS contracts. The response from the contract guard companies will determine the length of time needed for FPS to complete the training. It is important to note that not all posts manned by PSOs utilize screening equipment. Requirements for screening operations are based on Facility Security Level and specific tenant needs.

With respect to “active shooter response training,” the word “response” in particular, requires clarification. Its usage in this context gives the impression that PSOs are always required to respond when their post orders dictate otherwise. For an understanding of the PSOs responsibilities during an active shooter event, it is necessary to point out that if an active shooter appears within the PSO’s line of sight or within their assigned duty area, then the PSO will rely upon their use of force training to react. Otherwise, the PSO’s response to an active shooter event is dictated by his or her post orders. PSOs are not Federal law enforcement officers and do not possess the same authorities that an FPS officer, or Federal, State or local law enforcement agencies have in responding to an active shooter event.

PSOs are also not supposed to engage in tactics associated with a law enforcement response to an active shooter scenario. To be clear, FPS PSOs, as part of their procedures, are required to notify the FPS MegaCenter to request law enforcement response during an emergency. The FPS MegaCenter then dispatches law enforcement emergency responders who have the proper authority to respond to the incident.

PSOs receive awareness-level training that provides instruction on actions appropriate to their roles and responsibilities for an active shooter event that is incorporated in the post orders. FPS will continue to ensure that PSOs are trained on “Special Situations” they may encounter while on duty (including “active shooter” at the awareness level). This training and/or instruction occurs during their initial training (orientation training), through their required review of their guard posts orders, and during recurring post visits and on-the-job training activities conducted by inspectors throughout the regions.

FPS is also working in cooperation with security companies, through the National Association of Security Companies (NASCO), to determine the requirements that are needed to develop national lesson plans for PSOs. As part of this effort, FPS will assess all refresher training requirements (including screener or active shooter awareness level training). Estimated Completion Date (ECD): September 30, 2015.

Recommendation 2: Require that contract guard companies’ instructors be certified to teach basic and refresher training courses to guards and evaluate whether a standardized instructor certification process should be implemented.

Response: Concur. FPS is working in coordination with security companies through NASCO to develop a train-the-trainer Screener Training Course Pilot program where FPS will train and certify contract guard company contract guard instructors to teach PSOs the FPS Screener Training course (i.e., National Weapons Detection Training Program). The associated modification of requirements pertaining to contracts selected for the Pilot Program participants is nearing completion. Furthermore, FPS is working on the question sets the pilot program needs to answer in order to make future informed decisions. One of the major pieces of this pilot program will be to determine the effectiveness of using contract guard company instructors and how to best assess/provide effective oversight of this train the trainer pilot effort in the future. This effort feeds into the requirements review that will determine future national lesson plan efforts for all PSO training and informs FPS on the requirement and effectiveness of being the

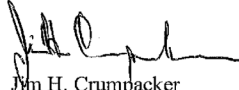
certifying authority for all instructors to train the FPS PSO National Lesson Plan. ECD: September 30, 2015.

Recommendation 3: Develop and implement procedures for monthly guard file reviews to ensure consistency in selecting files and verifying results.

Response: Concur. FPS has an audit procedure in place to conduct the monthly file reviews and is conducting a review of the current process to determine what improvements can be made. FPS has a standardized national audit checklist that is also being reviewed to determine if changes or additional guidance is needed for consistent reporting using the form. FPS is reviewing automated processes previously recommended by GAO that could provide FPS with an electronic review capability of guard certifications and qualifications that supplements the current audit process. Lastly, it is important to note that like most other Government agencies; FPS faces significant funding challenges making investments in automating and improving its processes given the current budget environment. ECD: March 30, 2015.

Again, thank you for the opportunity to review and provide comments on this draft report. Technical and sensitivity comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpacker
Director
Departmental GAO-OIG Liaison Office

Appendix III: GAO Contact and Staff Acknowledgments

GAO Contact

Mark Goldstein, (202) 512-2834, GoldsteinM@gao.gov

Staff Acknowledgments

In addition to the contact name above, Tammy Conquest, Assistant Director; Antoine Clark; Colin Fallon; Kathleen Gilhooly; Katherine Hamer; Amanda Miller; Ramon Rodriguez; William Woods; and Gwyneth Woolwine made key contributions to this report.

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