

**Audit of NARA's Security Guard
Contract for AI and AII**

OIG Audit Report No. 11-05

February 18, 2011

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Executive Summary

In May 2009, NARA issued a \$6.5 million contract to provide an armed, uniformed protective security force 24 hours a day, seven days a week for the physical protection of the National Archives properties located in Washington D.C. and College Park, Maryland. The primary responsibility of the contractor is to provide daily deterrence against unauthorized, illegal, or potentially life-threatening activities directed toward NARA employees, visitors, information programs, and property. Security support services to be performed by the contractor include, but are not limited to, armed security patrols, entrance screening and control, vehicle screening and control, personnel and asset escort duties, traffic control, law and order duties, and security and fire safety surveillance.

The purpose of this audit was to determine whether NARA was properly administering the contract, and whether the contractor was performing in accordance with contract requirements.

We found that additional oversight was needed over the firearm qualifications of the security officers because security officers were not following the firearm qualification requirements of the contract. Although officers must have a MD handgun permit and DC Special Police Officer certification, the firearm qualification used to qualify for these designations did not meet the level of skill required by the contract. Therefore, security officers may not be proficient in the use of firearms needed to stand post at NARA.

We identified additional areas of concern related to testing and training of the security officers and the physical fitness of the officers. Specifically, scenario tests and exercises were not conducted to assess security officer's response to real-world type situations. By not conducting these tests, NARA is missing an opportunity to determine whether the security officers are familiar with their post orders and emergency action procedures and whether additional training is needed. Further, the contractually required physical fitness program was not in place to ensure officers remained physically fit to be able to perform all the duties required of the job. NASS officials did not agree with our concern because they did not consider security officers to be law enforcement and did not believe there were many physical requirements of the job. However, if officers are not physically able to perform all the duties of the job, they place themselves, NARA employees, and visitors at an increased risk of injury.

This report contains seven recommendations which upon implementation will assist NARA in administration and oversight of the contract.

Background

In May 2009, NARA awarded a \$6.5 million contract to American Security Programs, Inc. to provide, properly staff, manage and maintain an armed, uniformed protective security force 24 hours a day, seven days a week service, for the physical protection of the National Archives properties located at 700 Pennsylvania Avenue, NW, Washington D.C., (referred to as Archives I), and 8601 Adelphi Rd, College Park, MD (referred to as Archives II). The security force is to provide daily deterrence against unauthorized, illegal, or potentially life-threatening activities directed toward NARA employees, visitors, information, programs, and property.

According to the Statement of Work, the contractor was to furnish management, supervisory, administrative, professional, and technically trained personnel, training, uniforms, equipment, materials, and supplies necessary to provide routine and emergency protective and security support services as required. These support services included armed security patrols, entrance screening and control, vehicle screening and control, personnel and asset escort duties, traffic control, law and order duties, and security and fire safety surveillance.

While the contractor had the primary responsibility for training and ensuring that the officers met certification requirements, NARA's responsibility included monitoring contract performance. Before being assigned to a post, NARA required that all officers undergo medical screening; and complete approximately 68 hours of contractor provided training along with four hours of Government provided classroom training. Security officers also had to pass a written examination and possess the necessary certifications, licenses, and permits as required by the contract.

The OIG identified contract management and oversight as one of the Top Ten Management Challenges for NARA. Effective contract management is essential to obtaining the right goods and services at a competitive price to accomplish NARA's mission. NARA is challenged to continue strengthening the acquisition workforce and improve the management and oversight of Federal contractors.

Objectives, Scope, Methodology

The purpose of this audit was to determine whether NARA was properly administering the contract and whether the contractor was performing in accordance with contract requirements.

This audit included a review of the security guard services contract at the National Archives Building in Washington, D.C. (AI) and the National Archives at College Park (AII). Security services at Presidential Libraries, Regional Archives, and Regional Records Centers were not covered as part of this contract.

We reviewed the security guard contract and statement of work to identify the requirements of the contract. To determine whether NARA developed an oversight program to ensure service levels reach and maintain the required levels throughout the contract we interviewed the Contracting Officer's Representative (COR) at AI and Security Management Branch (NASS) officials at AII to identify the oversight and monitoring they provide on the contract. To determine whether the contractor established a quality control program to assure that requirements of the contract were satisfactorily performed we interviewed the contractor's Project Manager and selected guard supervisors. We also obtained the contractor's Quality Control Plan and reviewed the results of contractor performed quality control inspections, duty monitoring, and the annual contract audit.

To determine whether training was provided to the officers and whether the topics covered were relevant to ensure security officers remain proficient in their duties, we obtained the contractor's training plan and reviewed documentation of training held to determine how many officers attended the training. To determine whether officers had been trained in the correct handling, safe use of and safeguarding of firearms and ammunition, we reviewed the firearms qualification certifications for a sample of security officers and observed the firearm qualification course conducted by the contractor. To determine whether the contractor had developed and maintained a physical fitness program for security officers we interviewed the contractor's Project Manager, reviewed SF-78 "Certificate of Medical Examination" forms on file for a sample of security officers, and reviewed the results of the physical fitness performance standard for those officers.

Our audit work was performed at Archives I in Washington, D.C. and Archives II in College Park, MD between April and November 2010. We conducted this performance audit 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.

Audit Results

1. Additional Oversight over Firearm Qualification Needed

Security officers did not meet the firearm qualification requirements of the contract. This occurred because NASS did not oversee firearm qualification to ensure the training and requalification course for security officers was as rigorous as NARA requirements. As a result, security officers may not be proficient in the use of firearms needed to stand post and NARA may be paying for a level of service it is not receiving.

Section 5.4 of the Statement of Work (SOW) for the Archives I and Archives II Security Services contract states that the contractor is responsible for firearms training requirements for those employees working on the task order and insuring those required employees have demonstrated proficiency in firearms training and qualification. The SOW references Attachment 7 to the contract, which outlines specific firearms qualification and training requirements. Firearm qualification was required no less than annually.

We reviewed a sample of 30 officers to determine whether they met the firearms qualification requirements in the contract. Of those 30 officers, all had a range certification from within the last year; however, we were unable to verify whether this qualification met the level of firearm proficiency mandated by Attachment 7. Only 6 of the 30 officers attended the firearm training and requalification course offered by the contractor. The remaining 24 officers elected to qualify with an independent third party instructor at their own expense.

We observed the firearm qualification held by the contractor's licensed instructor, and found the course of fire used to qualify NARA officers differed significantly from course of fire required in the contract. According to the contractor's instructor, the course of fire used was the Virginia/Washington DC Department of Criminal Justice Service Practical Pistol Course Fire. The contractor's course of fire was not as challenging as the NARA course of fire because the course included more rounds fired at a close distance and there were no rounds fired at 25 yards. (See Table 1).

NARA Course of Fire		Contractor's Course of Fire	
Yardage	# of Rounds	Yardage	# of Rounds
3	6	3	18
7	24	7	24
15	12	15	18
25	18	--	--
Total	60		60

Table 1. Comparison between NARA and Contractor's Course of Fire

Another difference was the target and scoring system used to qualify the security officers. The NARA course of fire directed the use of the NRA B-27 target (see Figure 1 below) where hits inside the X, 10, 9, and 8 rings count as five points, hits inside the 7 ring count as four points, and all other hits on the silhouette count as three points. The contractor used the Q Style target (see Figure 2 below) and any hit inside the silhouette counted as five points.

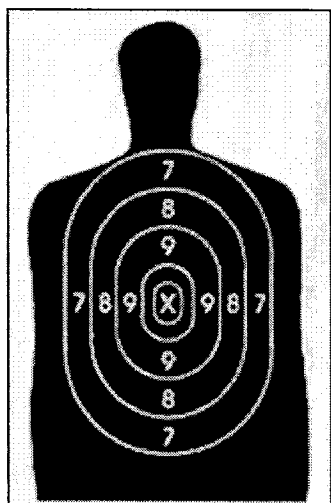


Figure 1. NRA B-27 Target

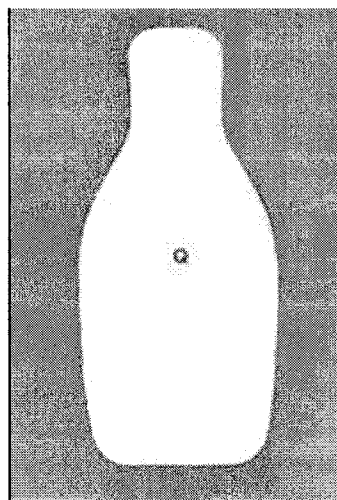


Figure 2. Q Style Target

In addition, although it was a timed qualification test, we observed that shots made after the cease fire whistle were still recorded and counted towards the officer's score. Officers were also given a chance to increase their score by the contractor's instructor who directed them to fire two rounds during the next iteration of fire if they failed to fire a round during the time allotted for the last round. Even with these extra allowances, the security officer we observed did not qualify on the first attempt.

For the remaining 24 security officers, we were unable to determine the exact course of fire they qualified under. According to the contractor Project Manager, third party instructors use their own course of fire to re-qualify officers because the state of Maryland and Washington D.C. do not specify a set course of fire for the handgun certification or Special Police Officer certification. We attempted to observe a firearm qualification given by one of the certified third party instructors who was used by 20 of those 24 officers. The certified instructor refused to allow the OIG to witness the re-qualification and would not answer questions about the course of fire he used¹. The Project Manager was unsure of the course of fire used because there is no set course of fire for Maryland or D.C. and the contractor does not witness qualifications conducted with a third party instructor. The Project Manager was able to confirm that the course of fire would be modified because the officers would not be allowed to draw from their holsters at the range used.

¹ The SOW did not specify whether security officers could use a third party instructor however, the SOW required the contractor to pay for the cost of firearm qualification.

We notified NASS officials of our concern that the firearm qualification was not as stringent as the course of fire required in the contract and that officers were re-qualifying with a third party instructor without contractor witnesses present to attest to the level of training and qualification. NASS officials initially shared our concern, and were prepared to take action to ensure the security officers could meet, at a minimum, the course of fire described in the contract. However, the NASS Chief decided that upon review of the contract, he believed the language regarding firearm training and qualification was unclear and was based on the previous contract in which security officers did not have to be dual certified in D.C. and Maryland². Therefore, he began discussions with the Contracting Officer to modify the contract. According to the NASS Chief, the modification would remove the requirement for the security officers to qualify with the NARA firearms course of fire. In addition, after talking with the contractor's instructor and the third party instructor used by a majority of the officers, the NASS Chief felt confident that the courses of fire used were sufficient for the security officers at NARA even though both courses of fire were easier than the original course of fire in the contract³. Lessening the requirements of the firearms qualification for security officers creates a risk that security officers will not be as skilled in firing their weapon if needed.

The NASS Chief stated that firearm certification (reviewing the paperwork) was included in their Quality Assurance Plan however, they did not include firearm qualification such as witnessing the actual qualifications. According to the NASS Chief, firearm qualification would be added to the Quality Assurance Plan and NASS staff would witness a sample of qualifications. The addition of firearm qualification to the Quality Assurance Plan will assist NASS officials in ensuring firearm qualification is sufficient. However, if NASS modifies the current contract to lessen the firearm qualification requirements for its officers, NARA will be paying for a higher firearms skill level than it is receiving.

Recommendations

1. The Assistant Archivist for Administration should periodically monitor firearm qualification for security officers by witnessing a representative sample of qualifications each year.
2. The Assistant Archivist for Administration should modify the contract, if needed, to include an option that firearm qualifications be witnessed by a NARA representative, including firearm qualifications conducted by independent third party instructors.
3. The Assistant Archivist for Administration should enforce the use of Attachment 7, the NARA course of fire. If the Assistant Archivist determines the NARA course of fire is too onerous for the contractor to follow, the Assistant

² We reviewed the previous contract and found the requirement for dual certification was included in that contract as well.

³ Although documentation was not available to confirm the course of fire used by the third party instructor, the NASS Chief stated that the course of fire included rounds fired at 1.5 yards.

Archivist should determine the financial impact of removing Attachment 7's requirements and based upon those findings, the contract should be modified and either renegotiated at a lower contract price or re-competed with the lesser contract requirement.

Management Response

Management concurs with the recommendations.

2. Practical Testing Exercises Not Conducted

Security officers have not participated in any scenario exercises to practice and test their response to real-world type situations. This occurred because the COR directed the contractor not to perform these scenarios until appropriate training was given to the security officers. As a result, NARA lacks assurance that the security officers will be able to respond to emergencies in accordance with their Post Orders and Emergency Action Procedures.

According to the contractor's Quality Control Plan, scenario exercises are practical testing exercises that involve the deployment of "undercover" contractor personnel who attempt to breach security policies and then monitor the responses of the security officers. Standard scenario exercises the contractor proposed to use at NARA included:

- attempting to gain access to facilities with [REDACTED];
- attempting to bring [REDACTED] and other suspicious items onto the premises;
- attempting to access the facility with a weapon or [REDACTED];
- attempting to carry a simulated hunting knife [REDACTED];
- attempting to gain access to the facility outside normal hours;
- attempting to gain entry through the main access gate with [REDACTED]; and
- attempting to remove a document from the research room without the proper stamping.

The Quality Control Plan intended these scenario exercises to be conducted monthly. However, since the contract issuance in May 2009, the contractor has not conducted any scenario exercises. According to the NARA COR, the contractor requested permission to conduct a scenario exercise involving an attempt to bring a weapon onto the premises but the COR would not authorize the test until the contractor provided the security officers with the proper training because the COR believed the contractor would be setting the officers up to fail.

According to the contract statement of work, the contractor was to plan and conduct refresher and sustainment training as needed, but no less than four hours each quarter.

The contractor was also required to submit a Training Plan that would include a schedule of all training. The contractor's Training Plan described initial training that would be provided to new hires as well as subsequent training courses. In addition to the training courses required to maintain certifications, the quarterly and annual training plan included a variety of courses such as:

- Use of Force (2 hour course)
- Patrol Techniques (2 hour course)
- Report Writing (2 hour course)
- Patrol and Observation (2 hour course)
- Patrol Methods (2 hour course)
- Recognition of Patrol Hazards (2 hour course)
- Response to Disturbances (2 hour course)
- Response to Crimes in Progress (2 hour course)
- Arrest Procedures and the Law (3 hour course)
- Preservation of the Crime Scene (1 hour course)
- Crimes Against Persons (2 hour course)
- Crimes Against Property (2 hour course)
- Search and Seizure (3 hour course)
- Crowd and Riot Control Formations (1 hour course)

None of these refresher training courses were held for the NARA security officers. In our review we found that most of the refresher training conducted related to maintenance of current credentials such as CPR/First Aid, firearms re-qualification, baton, and training related to customer service⁴. Newly hired security officers may have attended some of the courses listed above as part of the Advanced NARA Training; however, officers who remained at NARA from the previous contract⁵ did not receive the training.

According to an NASS official, security officers are given binders of written directions for each post with instructions for specific emergencies. Security officers are expected to be familiar with these procedures for responding to different emergency situations. The NASS official stated that drills have not been conducted because so far NARA has not had any major incidents and he was not aware of any requirement for drills to be conducted. In addition, the NASS official stated that he does not have enough funding, resources, or manpower to conduct the drills and that the contractor should be testing the security officers on their knowledge of the post orders. In a quality assurance contract evaluation completed by the contractor in August 2010, the NARA COR expressed concern with the security officer's knowledge of the post orders, their knowledge of evacuation procedures, and training. Conducting scenario exercises provides an opportunity to test whether the security officers are familiar with their instructions and identify any areas where additional training is needed.

⁴ According to the contractor, approximately 30% of the security officers received training on the X-Ray machine within the last year however; records of those who attended the training were not available for review.

⁵ Approximately 95 % of the supervisors and security officers remained from the previous contract.

Recommendation

4. The Assistant Archivist for Administration should conduct, or direct the contractor to conduct, periodic scenario exercises to test the response of the security officers.
5. The Assistant Archivist for Administration should conduct periodic inspections of the refresher training courses provided to security officers to ensure the contractor is following the approved Training Plan.

Management Response

Management concurs with the recommendations.

3. Physical Fitness Performance Standards Need Improvement

A mechanism to adequately measure the physical fitness of the security officers does not exist. This occurred because the annual physical fitness performance test required by the contract was not developed to test the physical abilities of the security officers. As a result, security officers may not be able to perform all duties required of the job and therefore place themselves, NARA employees, and visitors at an increased risk of injury.

According to the statement of work, the physical stamina of security officers in responding to and handling emergency situations is crucial in the performance of this task order. The contractor is responsible for developing and maintaining a physical fitness program for all supervisors and security officers assigned to perform duties under this task order. Supervisors and security officers annually complete a physical fitness performance test. Before an officer can take the test, the individual must first complete a medical screening in which a doctor reviews the security officer's overall health to determine whether there are any medical findings which would limit the person's performance of the job duties and/or would make him/her a hazard to himself or others.

We selected a judgmental sample of 30 security officers and supervisors to review the personnel files and determine whether the officers and supervisors had an SF-78 "Certificate of Medical Examination" on file as required by the contract. Of the 30 files reviewed, only one security officer did not have a record of medical screening on file. That security officer was sent to complete the medical screening once it was determined a copy of the screening could not be located.

While there was an SF-78 for the officers, we noted that the first page of the SF-78 was not always filled out to alert the examining doctor to the functional requirements and environmental factors of the job. If the doctor is not aware of the functional requirements or environmental factors of the job then the doctor would not be able to make an informed and complete assessment of whether the individual would be limited in their ability to perform the duties of the job.

According to Attachment 12 of the SOW, the physical fitness performance standard includes a simulated emergency covering a pre-established course⁶ for Archives I and Archives II. Security officers, including supervisors, must complete the course within 10 minutes. We noted a wide range of times that it took the security officers to complete the test. For example, one officer was able to complete the test in 3 minutes 47 seconds while at least two officers came close to not passing the test. One officer finished the test in 9 minutes, 56 seconds. Another officer's recorded time was 10 minutes. The contractor Project Manager was not aware of any security officers failing the test.

We found that the physical fitness performance test does not adequately measure whether security officers are able to perform the requirements of the contract. Specifically, according to the SOW, security officers are to monitor building fire alarm and intrusion detection systems and other protection devices or building equipment. Security officers will be dispatched and arrive at alarm sites within three minutes of an alarm activation. The simulated emergency in the physical fitness test does not test whether officers can respond to an alarm site within three minutes; instead, it allows security officers 10 minutes to complete the course. The SOW also requires all contractor personnel working under this task order to be in good physical condition and health, able to protect themselves and others, and withstand sudden emotional stress and physical exertion in apprehension of suspects and violators. An excerpt from the SOW is shown below:

“Responding to an emergency situation will be on foot, requiring running, jumping, climbing, and/or crawling, and followed by physical efforts as necessary to resolve the emergency situations such as assisting in suppressing fires, evacuating personnel, and overpowering an intruder or violator as necessary.”

None of these physical activities were included in the annual physical fitness performance test.

According to an NASS official, the test was originally developed to ensure security officers [REDACTED]. Further, the NASS official did not believe that additional physical fitness tests were needed because security officers [REDACTED]. We reviewed the Post Orders and Emergency Action Procedures for AI and AII and agree that the post orders [REDACTED]. However, the Emergency Action Procedures require security officers to [REDACTED]. Security officers [REDACTED] assist Police as requested. Therefore, NARA should ensure security officers are physically fit to perform duties as necessary on the contract and to assist Police as requested in responding to an emergency.

⁶ The pre-established course consisted of climbing up and down stairs.

Recommendation

6. The Assistant Archivist for Administration should develop a new fitness standard to test the physical fitness of the security officers that more closely resembles the requirements of the contract.
7. The Assistant Archivist for Administration should direct the COR to review the SF-78 forms for completeness before security officers are allowed to participate in the physical fitness performance standard test.

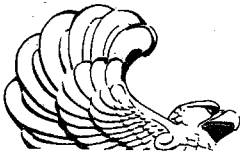
Management Response

Management concurs with the recommendations.

Appendix A – Acronyms and Abbreviations

COR	Contracting Officer's Representative
NARA	National Archives and Records Administration
NASS	Security Management Branch
SOW	Statement of Work

Appendix B - Management's Response to the Report



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10 February 2011

To: Paul Brachfeld, Inspector General
From: David S. Ferriero, Archivist of the United States
Subject: OIG Report 11-05, Audit of NARA's Security Guard Contract for AI and AII

Thank you for the opportunity to review this draft audit. The stated purpose of this audit was to determine whether NARA was properly administering the contract and whether the contractor was performing in accordance with contract requirements. The audit included findings relating to firearms qualifications for security officers, scenario testing and refresher training for security officers, and the physical fitness of the security officers. We concur with the seven recommendations, and have begun work on an action plan to satisfy them.

With respect to the requisite course of fire for certifying security guards, the audit expressed concern that security officers are not being required to meet the terms of the contract. Since receiving the draft audit report, NAS notified the contractor that it has not been meeting the terms of the contract with respect to the course of fire required by Attachment 7 of the contract and requiring the contractor to remedy its performance. In a letter dated December 30, 2010, the contractor stated that all NARA security officers are currently being qualified using the NARA Firearms Course of Fire. Copies of these letters are attached for your reference.

In our action plan, we will provide details about our work with the contractor on scenario design as well as monitoring and testing to ensure that security officers are well prepared to address a wide variety of situations. Our action plan will also reflect a request for proposal for a physical fitness program as noted in section 6.7 of the contract.

Finally, we are gathering information from other Federal agencies to ensure that our security guard contract and its implementation meet best practices wherever possible. If you have questions about these comments, please contact Mary Drak at mary.drak@nara.gov or by phone at 301-837-1668.

David S. Ferriero
Archivist of the United States

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Appendix C - Report Distribution List

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Deputy Archivist of the United States

Assistant Archivist for Administration

Management Control Liaison, Policy and Planning (NPOL)