



OFFICE of
INSPECTOR GENERAL

Date : August 2, 2011

Reply to
Attn of : Office of Inspector General (OIG)

Subject : Management Letter No. 11-18, Continued Security Concerns at AI and AII

To : David S. Ferriero, Archivist of the United States (N)

Management officials have failed to implement appropriate corrective action in response to the audit recommendations they concurred with in the Audit of NARA's Security Guard Contract for AI and AII (OIG No. 11-05). This failure places NARA personnel and property at an increased risk. This Management Letter focuses upon language contained in recommendation 4, which states the Assistant Archivist for Administration "should conduct, or direct the contractor to conduct, periodic scenario exercises to test the response of security officers." In the five months since report issuance, the "periodic scenario exercise" has extended to one test.

No additional tests were conducted in the subsequent three months. According to the Director of Security, training was being conducted in response to the operational failure, but additional tests of other scenarios would be delayed until the security guard staff had "matured."

Under the Department of Homeland Security's Interagency Security Committee guidelines, AI and AII are category IV Federal facilities. Level IV facilities are categorized as occupying more than 150,000 sq. ft. of space, housing more than 450 federal employees, and as having "high volume public contact." Level IV facilities include federal courthouses with high-risk court chambers, judicial offices, and buildings housing highly sensitive government records. The only higher level, Level V, extends to mission critical national security buildings such as the Pentagon.

NARA has a contract in place with American Security Programs (ASP) to provide security guard service at AI and AII. In their October 2009 Quality Control Plan, ASP states "Scenario exercises will be implemented periodically² over the duration of the contract" and specifically defines typical scripts that may be followed. In OIG Audit No. 11-05 we reported that "the COR directed the contractor not to perform these scenarios until appropriate training

1 NARA officials refer to this as two tests since both front and rear doors were tested.

2 ASP defined in their QA Plan that scenario exercises would be conducted monthly.

was given to the security officers.” In the two years since ASP has been providing security guard services NARA officials could not show that any scenario exercises had been performed by ASP. In the months following the release of the subject audit report, one test of one scenario was performed and met with failure. No subsequent test was performed of that scenario, or any other potential security threat, which may exist to our facility, staff, visitors or holdings.


In addition to ASP, NARA also has a duty to perform scenario testing. NARA’s contract with ASP states, with emphasis added:

Depending upon such things as the frequency and the nature of specific facility security problems, **a series of evaluation drills will be conducted periodically by the Government** to assure the emergency response capability of security personnel. It is anticipated that drills would be conducted during normally scheduled shift hours at no additional expense to the vendor.

Despite this contract language, NARA has failed to conduct a single security drill that would test the emergency response capability of the security guards in different situations.³ The Director of Security in a meeting with OIG staff, including the Inspector General, stated there is no need to conduct exercises as no specific threat has been identified to AI or AII necessitating such action.

The security of NARA facilities, our staff, visitors and holdings is of paramount concern. Senior Security personnel that actively stand to impede contractors from conducting security exercises, and do not initiate and monitor controlled exercises in the wake of multiple tragic events directed against federal buildings in recent history, is troubling. The benign indifference to the threats faced by the National Archives represents an unacceptable posture, and the failure to implement corrective measures such as periodic scenario exercises to test the response of security officers is flawed and unconscionable.

If you have any questions concerning the information presented in this Management Letter, please contact me at (301) 837-1532.



Paul Brachfeld
Inspector General

³ NARA periodically conducts fire drills and shelter-in-place drills as well as an annual exercise of the Homeland Security Advisory System Threat Level Orange procedures in which all persons and packages entering the building are subject to 100% security screening.