



U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF INSPECTOR GENERAL

Catalyst for Improving the Environment

Audit Report

EPA Did Not Properly Account for All Property for Implementing Homeland Security Presidential Directive-12

Report No. 09-P-0233

September 15, 2009



Report Contributors:

Nancy Dao
Mike Davis
Heather Layne
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Abbreviations

EPA	U.S. Environmental Protection Agency
FAS	Fixed Assets Subsystem
HSPD	Homeland Security Presidential Directive
IFMS	Integrated Financial Management System
OIG	Office of Inspector General
SMD	Security Management Division

Cover photos: *From left:* EPA's ID Proofing Station, Enrollment Station, and Issuance Station used to issue Smartcards. (EPA photos)



At a Glance

Catalyst for Improving the Environment

Why We Did This Review

We initiated this audit based on a hotline complaint related to Homeland Security Presidential Directive (HSPD)-12 and the fact that the U.S. Environmental Protection Agency (EPA) had nearly \$1 million in such property. Our objective was to determine whether property purchased to support HSPD-12 was accounted for in accordance with EPA policies and procedures.

Background

HSPD-12, *Policy for a Common Identification Standard for Federal Employees and Contractors*, established a mandatory, government-wide standard for secure and reliable forms of identification issued by the Federal Government to its employees and contractors. HSPD-12 requirements included identity proofing, registration, card issuance, and card management.

For further information, contact our Office of Congressional, Public Affairs and Management at (202) 566-2391.

To view the full report, click on the following link:
www.epa.gov/oig/reports/2009/20090915-09-P-0233.pdf

EPA Did Not Properly Account for All Property for Implementing Homeland Security Presidential Directive-12

What We Found

EPA generally recorded HSPD-12 property accurately in EPA's Fixed Assets Subsystem (FAS). However, we noted the following discrepancies:

- four pieces of property valued at \$29,538 were missing and not recorded in FAS,
- acquisition costs in FAS were incorrect for some equipment, and
- nonfinancial information for several pieces of property was not accurately recorded.

To meet an Office of Management and Budget deadline, EPA shipped property to other EPA locations before the property was recorded in FAS. Effective personal property management requires integration of property and financial management records. Incorrect information in FAS could have an adverse effect on the Agency's financial statements.

The contract for implementing HSPD-12 did not include clauses to address property management responsibilities. Tasks under the contract statement of work required the contractor to account for the property as if it were government-furnished property, but because the property was used in government facilities, EPA did not consider the property to be government-furnished property. Consequently, the contract did not properly reflect the status of the property.

As a result of the deficiencies noted, there is an increased risk of loss of government property and inaccurate reporting.

What We Recommend

We recommend that EPA use established procedures to resolve accountability for the missing property, and review accuracy of HSPD-12 property information in FAS and update any discrepancies. We also recommend that EPA modify the HSPD-12 contract to reflect contractor requirements and accountability for using government property in government facilities.

The Agency concurred with the report recommendations and provided corrective action plans. EPA established a December 2009 milestone for resolving missing HSPD-12 property and updating FAS with accurate records. The Agency also modified the contract on July 22, 2009, to reflect contractor requirements and accountability for the HSPD-12 property.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
INSPECTOR GENERAL

September 15, 2009

MEMORANDUM

SUBJECT: EPA Did Not Properly Account for All Property for Implementing
Homeland Security Presidential Directive-12
Report No. 09-P-0233

FROM: Melissa M. Heist
Assistant Inspector General for Audit

Melissa M. Heist

TO: Craig Hooks, Assistant Administrator
Office of Administration and Resources Management

This is our report on the subject audit conducted by the Office of Inspector General (OIG) of the U.S. Environmental Protection Agency (EPA). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. This report represents the opinion of the OIG and does not necessarily represent the final EPA position. EPA managers in accordance with established resolution procedures will make final determinations on matters in this report.

The estimated cost of this report – calculated by multiplying the project's staff days by the applicable daily full cost billing rates in effect at the time – is \$123,103.

Action Required

In responding to the draft report, the Agency provided corrective action plans for addressing all of the recommendations. Therefore, a response to the final report is not required. The Agency should track corrective actions not implemented in the Management Audit Tracking System. We have no objections to the further release of this report to the public. The report will be available at <http://www.epa.gov/oig>.

If you or your staff have any questions regarding this report, please contact Janet Kasper at (312) 886-3059 or kasper.janet@epa.gov, or Michael Davis at (513) 487-2363 or davis.michaeld@epa.gov.

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Purpose

We initiated this audit based on a hotline complaint related to Homeland Security Presidential Directive (HSPD)-12, which alleged that property was shipped to regional offices and labs without being recorded in EPA's Fixed Assets Subsystem (FAS), and the fact that the U.S. Environmental Protection Agency (EPA) had nearly \$1 million in such property. Our objective was to determine whether property purchased to support HSPD-12 was accounted for in accordance with EPA policies and procedures.

Background

HSPD-12, *Policy for a Common Identification Standard for Federal Employees and Contractors*, issued August 27, 2004, established a mandatory, government-wide standard for secure and reliable forms of identification issued by the Federal Government to its employees and contractors. HSPD-12 program requirements include identity proofing, registration, card issuance, and card management. EPA's Security Management Division (SMD) is responsible for implementing HSPD-12. SMD is within the Office of Administration and Resources Management's Office of Administration, which is responsible for the acquisition of all Agency facilities, property management, and property security.

EPA selected a contractor to serve as both the designer and implementer of EPA's HSPD-12 program. This included but was not limited to providing technical and programmatic support; project management services; and the configuration, installation, operation, and acquisition of new and existing systems. Property purchased for implementation of the directive included:

- **ID Proofing Station** - Dell Laptop or Desktop, ViiSage Authenticator, Intellicheck Card Reader, and HP Flatbed Scanner.
- **Enrollment Station** - Dell Laptop or Desktop, SIIG Firewire Card, Belkin Hub, Identix Touch Print Scanner, and Canon Digital Camera.
- **Issuance Station** - Dell Laptop/Desktop, Fargo High Definition Printer 600, Precise Reader, numeric keypad, and Omni Key Card Reader.

The cover of this report contains pictures of the three stations.

EPA's Personal Property Policy and Procedures Manual prescribes policy and procedural guidance for personal property management by EPA employees and contractors. According to the manual:

- Control of accountable personal property is to be established in EPA's Integrated Financial Management System (IFMS) upon receipt of property and must be maintained until disposal.
- Accountable personal property is personal property with an acquisition cost of \$5,000 or more, all leased personal property, and sensitive items. Sensitive items are those that have a high potential for theft, including laptop computers, digital cameras, and scanners.
- Property accountable officers and custodial officers are responsible for accounting for accountable personnel property, including sensitive items.

- Determination of the cost used in recording personal property in the appropriate accounts is an essential element of personal property accounting.

FAS supports the accounting and managing of physical property items. FAS interfaces with IFMS subsystems to support fiscal and risk management as well as standard reporting. FAS maintains the original and subsequent value of assets as well as replacement values. According to SMD's custodial officer, SMD is responsible for recording information on equipment supporting HSPD-12 in FAS. SMD reported the purchase of \$977,918 in HSPD-12 property as of October 6, 2008.

Scope and Methodology

We conducted this audit from September 2008 through June 2009 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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

We visited EPA Headquarters in Washington, DC, where we met with SMD management responsible for the oversight and control of HSPD-12 property. We interviewed Office of Administration and Resources Management staff, such as the property accountable officer, contracting officer, contract property coordinator, and SMD's custodial officer, to determine the processes used to manage and account for HSPD-12 property.

We assessed the internal controls relevant to our objective. We gained an understanding of the internal controls by reviewing EPA's Personal Property Policy and Procedures Manual, Contracts Management Manual, Acquisition Regulations, and Custodial Officer's Guide. To determine whether property purchased in support of HSPD-12 was accounted for in accordance with EPA policies and procedures, we reviewed documentation, such as contracts, modifications, and statements of work. We also reviewed property information recorded in the Agency's FAS, SMD's and the contractor's listing of property, and EPA orders and invoices for supplies.

Our scope was limited to evaluating EPA activities as they related to property acquired to support implementation of HSPD-12; we did not evaluate Agency activities as they related to accountability for any other property.

We are not aware of any prior report recommendations specifically related to this report's audit objective.

Results of Review

EPA generally recorded HSPD-12 property accurately in FAS. However, several items were not recorded in FAS and could not be located, and cost information and other information was not always properly recorded in FAS. Further, the EPA contract statement of work for implementing HSPD-12 required the contractor to maintain an inventory of the property as if it were

government furnished despite the Agency's determination that it is not government-furnished property. As a result of the deficiencies noted, there is an increased risk of loss of government property and inaccurate reporting.

EPA Fixed Assets System Is Not Always Accurate

Four pieces of property, valued at \$29,538, were missing and not recorded in FAS. Also, the acquisition cost recorded for property in FAS was incorrect, and nonfinancial information for several pieces of property was not accurately recorded. To meet an Office of Management and Budget-mandated deadline, the Agency shipped property to other EPA locations before it was recorded in FAS. Effective personal property management requires integration of property records and financial management records; incorrect information in FAS could potentially have an adverse affect on the Agency's financial statements.

Missing Property

SMD discovered four pieces of equipment, valued at \$29,538, missing when property was transitioned from the previous contractor to the current contractor. The four items in the records of the previous contractor but not transferred to the current contractor are listed in Table 1.

Table 1: Missing Items

Item	Cost
Camera	\$2,025
Fargo Printer	8,321
ViiSage Authenticator	9,596
ViiSage Authenticator	9,596
Total	\$29,538

Source: SMD

The missing items were not recorded in FAS, or SMD's or the contractor's listing of HSPD-12 property. SMD's director stated that an equipment inventory reconciliation was performed before transitioning property to the current contractor (the new contract was awarded on March 12, 2008). The four pieces of equipment were not located during the reconciliation. SMD has disapproved the final invoice submitted by the previous contractor pending resolution.

The Agency should use the established policies and procedures for lost, damaged, or destroyed property that are in the Personal Property Policy and Procedures Manual to resolve accountability for the missing property. These procedures include notifying the security office and property accountable officer; preparing a Survey Report Memorandum describing the circumstances of the lost, damaged, or destroyed property; and submitting the memorandum to the property accountable officer. After review, the property accountable officer submits information to the property management officer, who determines whether to convene the Board of Survey. The Board of Survey serves as a fact-finding body charged with determining the circumstances and conditions when

property is declared lost, damaged, or destroyed, and issues findings and recommendations to the property management officer for action.

Inconsistent Cost Information in FAS

We found 31 instances in which property was incorrectly recorded in FAS (see Table 2) and thus in IFMS. The recorded value for these 31 items totaled \$200,419. Property cost provided by SMD was not consistent with the cost recorded in FAS. For example, items such as laptops and scanners were purchased by SMD as a “kit,” but these items were listed as separate items with different costs in FAS. SMD is currently working on determining the unit cost and updating any incorrect information in FAS.

Table 2: Cost Recorded for 31 Property Items

No. of Items	Description	SMD Listing of Cost	Total SMD Cost	FAS Listing of Cost	Total FAS Cost
3	Desktop - OptiPlex GX620	\$10,080 (3)	\$30,240	\$575 (3)	\$1,725
25	Touchprint Fingerprint Capture	\$7,800 (16)	\$124,800	\$7,900 (16)	\$126,400
		\$7,900 (6)	\$47,400	\$2,720 (1)	\$2,720
				\$3,725 (1)	\$3,725
				\$7,900 (4)	\$31,600
		\$10,080 (3)	\$30,240	\$7,900 (3)	\$23,700
3	Dell Latitude D520	\$7,800 (2)	\$15,600	\$1,169 (1)	\$1,169
				\$2,500 (1)	\$2,500
	Dell Latitude D520	\$7,900 (1)	\$7,900	\$6,880 (1)	\$6,880
Total (31)			\$256,180		\$200,419

Source: OIG analysis of EPA data

The SMD deputy director stated that during implementation, SMD decoupled the laptop and scanner, and the acquisition prices for the individual components were not available. In addition, acquisition prices of individual components were recorded as the kit price, while other times a reasonable approximation of what the individual component acquisition price would be was recorded. The deputy director indicated “SMD will work with the Property Management team to develop a consistent strategy of recording the acquisition prices of individual components, where an error in recording the acquisition prices has been detected; SMD will work with the Property Management team to update FAS with the correct purchase information.”

According to EPA’s Personal Property Policy and Procedures Manual, determination of the cost used in recording personal property is an essential element of personal property accounting. The current value of accountable personal property is to be maintained in IFMS and should be recorded on an item-level basis (i.e., each individual item is a separate record).

Inaccurate Property Information in FAS

Our review of property information in EPA's FAS found seven items with incorrect purchase order numbers, property locations, or acquisition dates (see Table 3). In Fiscal Year 2006, SMD began purchasing property for the issuance of smartcards. Upon receipt, SMD calibrated and shipped the property to various EPA locations.

Table 3: Inaccurate Property Information

Decal Number	Item	Incorrect information in FAS
B11866	Scanner	Acquisition date
B11878	Scanner	Acquisition date
S10865	Laptop	Acquisition date, location of property
SA7047	Scanner	Purchase order number, location of property
B11654	ViiSage	Acquisition date, location of property
S12071	Camera	Acquisition date
B11872	ViiSage	Acquisition date

Source: OIG analysis of EPA data

Not all property was affixed with an EPA decal number and accounted for in FAS before shipping. In September 2008, an EPA contractor sent correspondence to 13 different EPA locations stating items shipped were not decaled before leaving and, therefore, were not entered into IFMS. The correspondence listed 34 property items, of which only 7 had EPA decal numbers at the time. The SMD director said SMD was aware of the property not being decaled and entered into FAS before it was shipped to other EPA locations, but flexibility was required to get the smartcards issued by the Office of Management and Budget-mandated deadline of September 30, 2008. SMD's deputy director indicated SMD would work with the Property Management team to get FAS updated with the correct information.

EPA's Personal Property Policy and Procedures Manual requires that personal property records be maintained and entered into FAS in a timely manner. In addition, EPA Custodial Officer's Guide requires that property received at a central receiving point (warehouse) be decaled and entered into FAS before delivery to the end user. It further states that for property delivered directly to the end user, as was done for some HSPD-12 property, the end user/purchaser must notify the property accountable officer so that the property can be properly decaled and entered into FAS.

EPA Did Not Update HSPD-12 Implementation Contract

The contract for implementing HSPD-12 does not include the correct clauses to address property management responsibilities. Tasks under the contract statement of work require the contractor to account for the property as if it were government-furnished property. However, the property is used in government facilities, and EPA officials do not consider government property used by a contractor in government facilities to be government-furnished property. An exception was not written in any EPA policy or guidance until February 2009. The contract did not properly reflect the status of the property because the contracting officer did not provide the contract to the contract property coordinator for review prior to issuance as required. We could not determine

why the initial contracting officer involved in the awarding of the contract did not provide the contract to the contract property coordinator because he has left the Agency.

Government-furnished property is defined as property directly acquired by the government and furnished to the contractor for the performance of the contract. The current contract requires the contractor to maintain an accurate, complete, and updated inventory of equipment, and the contractor was meeting this requirement. The contract language was similar to what would have been included in a contract if the property were government-furnished property used at a non-EPA facility.

On February 27, 2009, the Office of Acquisition Management issued a Contract Property Accountability FLASH Notice that stated, "EPA property located in an EPA facility should remain under the care and control of EPA facilities personnel. Contractors entering an EPA facility to perform services that involve the use of EPA property (whether solely or shared with EPA employees) should not be contractually liable for the EPA property. Therefore, EPA property located at an EPA facility should not be placed on EPA contracts nor be the responsibility or liability of the contractor."

EPA's contract property coordinator plays an important role in contract property management under EPA contracts. The coordinator provides technical expertise and assistance to contracting and project officers relative to contract property management under EPA contracts. According to the contract property coordinator, contracting officers are required to submit copies of all contracts that include property to the contract property coordinator for review before issuance. This was not done for the HSPD-12 implementation contract. The contract property coordinator explained the contract requirements should be changed to clarify the contractor's role as it relates to the use of the property. The February 2009 FLASH Notice requested action by contracting officers for contracts with government property when the property is located at an EPA facility. Contracting officers were requested to modify contracts to remove all government property and send copies of those modifications to the contract property coordinator to ensure accountability of property identified on the modifications.

EPA should modify the contract to ensure property roles and responsibilities are clearly delineated.

Recommendations

We recommend that the Director, Office of Administration, Office of Administration and Resources Management:

1. Require SMD to use established policies and procedures in the Personal Property Policy and Procedures Manual for lost, damaged, and destroyed property to resolve accountability for the missing property.
2. Require SMD to review the accuracy of HSPD-12 property information in FAS and update any discrepancies such as decal identification, location, purchase order numbers, and cost.

We recommend that the Director, Office of Acquisition Management, Office of Administration and Resources Management:

3. Modify the HSPD-12 contract to reflect contractor requirements and accountability for using government property in government facilities.

Agency Comments and OIG Evaluation

In responding to the draft report, the Office of Administration and Resources Management's Office of Administration and Office of Acquisition Management concurred with the report recommendations.

The Office of Administration, in responding to recommendation 1, instructed SMD to use established policies and procedures in the Personal Property Policy and Procedures Manual for lost, damaged, and destroyed property to resolve accountability for the missing HSPD-12 property. The Agency milestone listed for completing this corrective action was December 2009. The planned corrective action meets the recommendation intent.

The Office of Administration instructed SMD, in response to recommendation 2, to review the accuracy of HSPD-12 property information in FAS and work with the Property Management team to update any discrepancies related to such items as decaled information, location, purchase order numbers, and cost. SMD has already worked with the Agency Property Management Officer in the Facilities Management and Services Division to update certain purchase information in FAS and plans to complete the updates by December 31, 2009. The planned corrective action meets the recommendation intent.

The Office of Acquisition Management, in response to recommendation 3, issued modification #11 to the HSPD-12 Contract GS-35F-4997G, Task Order 15, to reflect contractor requirements and accountability for using government property in government facilities. The modification was issued to the contractor on July 22, 2009, to establish accountability for the property, to clarify that the task order does not include government property, and to identify the EPA Contract Property Coordinator. We reviewed the modification and it addresses the recommendation.

The complete Agency response to the draft report is in Appendix A.

Status of Recommendations and Potential Monetary Benefits

RECOMMENDATIONS						POTENTIAL MONETARY BENEFITS (in \$000s)	
Rec. No.	Page No.	Subject	Status ¹	Action Official	Planned Completion Date	Claimed Amount	Agreed To Amount
1	6	Require SMD to use established policies and procedures in the Personal Property Policy and Procedures Manual for lost, damaged, and destroyed property to resolve accountability for the missing property.	O	Director, Office of Administration, Office of Administration and Resources Management	12/31/2009		
2	6	Require SMD to review the accuracy of HSPD-12 property information in FAS and update any discrepancies such as decaled identification, location, purchase order numbers, and cost.	O	Director, Office of Administration, Office of Administration and Resources Management	12/31/2009		
3	7	Modify the HSPD-12 contract to reflect contractor requirements and accountability for using government property in government facilities.	C	Director, Office of Acquisition Management, Office of Administration and Resources Management	07/22/2009		

¹ O = recommendation is open with agreed-to corrective actions pending
C = recommendation is closed with all agreed-to actions completed
U = recommendation is undecided with resolution efforts in progress

Appendix A

Agency Response to Draft Report

MEMORANDUM

SUBJECT: Response to Audit Report Draft

FROM: Renee Page, Director
Office of Administration

TO: Janet Kasper, Director
Contracts and Assistance Agreement Audits

On behalf of the Acting Administrator for OARM, Craig Hooks, please find attached OARM's written response to the findings and recommendations as referenced in your memorandum to Mr. Hooks dated June 19, 2009.

Please note that the written response has been provided by and through the Director for the Office of Administration for OARM and the Acting Director for the Office of Acquisition Management for OARM as both are responsible for specific areas or elements within the scope of audit.

Should you have any questions or wish to discuss this response, please call me at (202) 564-8400 or my Acting Deputy, Dennis Bushta, at the same number.

Attachment

MEMORANDUM

SUBJECT: Response to Audit Report Draft

FROM: Tami Franklin, Director
Security Management Division

THRU: Renee Page, Director
Office of Administration

John Gherardini, Acting Director
Office of Acquisition Management

TO: Janet Kasper, Director
Contracts and Assistance Agreement Audits
Office of Inspector General

Thank you for the opportunity to comment on the Office of Inspector General's (OIG's) Draft Audit Report ("Report") of June 19, 2009: *EPA Did Not Properly Account for All Property for Implementing Homeland Security Presidential Directive-12*.

The Security Management Division (SMD) concurs with the Report's Recommendations 1 and Recommendation 2. In addition, the Office of Acquisition Management (OAM) concurs with Recommendation 3, which involves contract modification. The planned or actual completion dates for the recommendations, as well as corrective actions already initiated, are below.

1. *Require SMD to use established policies and procedures in the Personal Property Policy and Procedures Manual for lost, damaged, and destroyed property to resolve accountability for the missing property.*

The Director of the Office of Administration has instructed SMD to use established policies and procedures in the Personal Property Policy and Procedures Manual for lost, damaged, and destroyed property to resolve accountability for the missing items detailed on page 3 of the Report, due by the date indicated. Planned Completion Date: December 31, 2009.

2. *Require SMD to review the accuracy of HSPD-12 property information in FAS and update any discrepancies such as decaled identification, location, purchase order numbers, and cost.*

The Director of the Office of Administration has instructed SMD to review the accuracy of HSPD-12 property information in FAS and work with the Property Management team to update any discrepancies related to such items as decaled information, location, purchase order numbers, and cost, by the date indicated. SMD has already worked with

Connie Posey, Team Leader, Agency Property Management Officer in the Facilities Management and Services Division, to update certain purchase information in FAS. Planned Completion Date: December 31, 2009.

3. *Modify the HSPD-12 contract to reflect contractor requirements and accountability for using government property in government facilities.*

To reflect contractor requirements and accountability for using government property in government facilities, OAM issued modification #11 to the HSPD-12 Contract GS-35F-4997G, Task Order 15. The modification was issued to the contractor to clarify that the task order does not include Government property, and to clarify the identity of the EPA Contract Property Coordinator (CPC). The recommended action was completed as of July 22, 2009.

SMD's comments on the Report are only to clarify the extent of the incorrect information in the Fixed Assets Subsystem (FAS). *At a Glance: What We Found* says: "Acquisition costs in FAS were incorrect..." (second bullet). SMD respectfully requests this be changed to: "Certain [or Some] acquisition costs in FAS were incorrect..." so as not to imply that all such information was incorrect.

For the same reason, SMD requests that the section title *EPA Fixed Assets System is Not Accurate* (page 3) be changed to: *Certain [or Some] Information in EPA Fixed Assets System is Not Accurate*. Within that section, SMD asks that the second sentence in the first paragraph be changed to: "Also, the acquisition cost recorded for certain [or some] property in FAS was incorrect...."

SMD believes that the section entitled *Inconsistent Cost Information in FAS* (p. 4) overstates the extent of incorrect information. As SMD Acting Director Tami Franklin documented in her May 7, 2009, comments on the Discussion Draft of this Report, 20 of the Dell Latitude laptops were accurately recorded in FAS as costing \$3,440, and one of the Touchprints was accurately recorded as costing \$4,460. SMD therefore requests that reference to these 21 items be removed from Table 2 (page 4) and from the related discussion in this section.

Thank you for considering these requests, which SMD believes to be consistent with portions of the Report that do clarify the extent of the incorrect information. For example, *At a Glance: What We Found* also says: "Non-financial information for several pieces of property was not accurately recorded" (third bullet; emphasis added). Text under *EPA Fixed Assets System is Not Accurate* (page 3) limits the scope of discussion to four pieces of property.

Again, we appreciate this opportunity to review and comment on the Report. If you have additional questions, please contact SMD Acting Director Tami Franklin at 202-564-9218.

Appendix B

Distribution

Office of the Administrator
Assistant Administrator, Office of Administration and Resources Management
Acting Director, Office of Acquisition Management, Office of Administration and
Resources Management
Director, Office of Administration, Office of Administration and Resources Management
Agency Follow-up Official (the CFO)
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