



Smithsonian
Institution

**Physical Security: The Office of
Protection Services Needs to
Strengthen Training, Medical and
Physical, and Equipment
Requirements for Armed Security
Guards and Improve Oversight of
Unarmed Contract Guards**

Office of the Inspector General

OIG-A-18-08

September 18, 2018



In Brief

Physical Security: The Office of Protection Services Needs to Strengthen Training, Medical and Physical, and Equipment Requirements for Armed Security Guards and Improve Oversight of Unarmed Contract Guards

OIG-A-18-08, September 18, 2018

What OIG Did

This audit examined the training, medical and physical, and equipment standards for the Smithsonian's armed security guard force and compared those standards with best practices in minimum standards established by the federal government's ISC, of which the Smithsonian is an associate member.

OIG also examined how OPS ensures that unarmed contract guards at museums in Washington, D.C. meet qualification and training requirements specified in the Smithsonian's contract.

Background

OPS has determined that the security level for Smithsonian museums is very high risk based on the ISC's Risk Management Process. In March 2018, OPS employed about 530 security guards, the majority of whom are armed and stationed in Washington, D.C. Their duties include, among other things, supervising visitor screening and responding to incidents.

OPS also has a contract that provides unarmed guards to monitor exhibition galleries. Beginning in 2016, OPS used the contract guards to conduct visitor screening at the five busiest museums on the National Mall. As of March 2018, more than 360 unarmed contract security guards worked at museums in Washington, D.C.

What OIG Found

The Smithsonian Institution's (Smithsonian) Office of Protection Services (OPS) requires new security guards to attend basic training classes before they can become armed guards. However, the Office of the Inspector General (OIG) found that between 2014 and 2016, 88 of 119 new security guards (74 percent) were allowed to graduate without completing all basic training instruction because OPS did not have a policy or procedures to ensure that guards attended all basic training. Specifically, individual guards missed between 1 and 6 days of instruction. The OPS Director has stated that all guards must qualify with their firearm before they can graduate. In addition, OIG found that almost all security guards received required refresher training (annual firearms qualification and first aid every 2 years).

OIG also compared the basic training provided by OPS with a set of best practices in minimum standards developed by the Interagency Security Committee (ISC) for armed security guards. Although the Smithsonian is not required to meet these standards, they are recognized as best practices governing armed guards working at buildings and facilities in the U.S. that federal employees occupy for nonmilitary activities. OIG found that OPS basic training met or partially met most ISC standards. However, the ISC recommends that armed guards qualify on firearms twice a year, while OPS only requires firearms qualification once a year.

Furthermore, OIG found that the ISC has more detailed and specific medical and physical standards than OPS in such areas as vision, hearing, cardiovascular system, musculoskeletal system, and general health. The ISC also recommends a medical examination and physician clearance for armed security guards, but OPS did not have independent verification by a physician that its minimum medical and physical requirements had been met. OPS is working to establish improved medical and physical standards, but it has not established a target completion date or interim milestones for implementation of these new medical and physical standards.

In addition to its armed security guard force, OPS uses unarmed contract guards. The Contracting Officer's Technical Representative (COTR), an OPS employee, is responsible for ensuring that the contract requirements for licensing and training of unarmed contract security guards are met. OIG found that the COTR did not verify whether the contract security guards met licensing and training requirements. The COTR instead relied on the contractor to ensure that the contract security guards met the requirements.

What OIG Recommended

OIG made seven recommendations to strengthen the security guard training, medical and physical, and equipment standards, as well as contract guard oversight. Management agreed with all seven recommendations.

For additional information or a copy of the full report, contact OIG at (202) 633-7050 or visit <http://www.si.edu/oig>.



Smithsonian Institution
Office of the Inspector General

Memo

Date: September 18, 2018

To: Albert Horvath, Chief Operating Officer and Under Secretary for Finance and Administration
Mike McCarthy, Deputy Under Secretary for Finance and Administration
Jeanne O'Toole, Director, Office of Protection Services (OPS)

Cc: Doug Hall, Deputy Director, Physical Security and Business Operations, OPS
Deirdre Walker, Deputy Director for Operations, OPS
Hugh Meehan, Associate Director, Finance and Special Programs, OPS

From: Cathy L. Helm, Inspector General *Cathy L. Helm*

Subject: Physical Security: The Office of Protection Services Needs to Strengthen Training, Medical and Physical, and Equipment Requirements for Armed Security Guards and Improve Oversight of Unarmed Contract Guards (OIG-A-18-08)

This memorandum transmits our final audit report on the Office of Protection Services (OPS) training, medical and physical, and equipment requirements of armed guards and oversight of unarmed contract guards. This audit examined how OPS ensured that its armed security guard force met its training, medical and physical, and equipment requirements and how OPS's requirements align with best practices in minimum standards established by the federal government's Interagency Security Committee. In addition, we examined how OPS ensured that unarmed contract guards met qualification and training requirements specified in the Smithsonian Institution's (Smithsonian) contract.

We made seven recommendations for OPS management to improve the guard training, medical and physical standards, as well as contract guard oversight. Management concurred with all seven recommendations.

We appreciate the courtesy and cooperation of all OPS and Smithsonian management and staff during this audit. If you have any questions, please call me or Joan Mockeridge, Assistant Inspector General for Audits, at (202) 633-7050.

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ABBREVIATIONS

BELT	Basic Entry Level Training
CPR	Cardiopulmonary Resuscitation
COTR	Contracting Officer’s Technical Representative
ISC	Interagency Security Committee
OIG	Office of the Inspector General
OPM	Office of Personnel Management
OPS	Office of Protection Services
Smithsonian	Smithsonian Institution

INTRODUCTION

Recent terror attacks and active shooter incidents around the world have highlighted the need for greater security and the importance of a skilled, well-trained security guard force. Museums are not immune to these types of attacks. For example, attacks have occurred at the Bardo National Museum in Tunisia (March 2015), the Jewish Museum of Belgium (May 2014), and the U.S. Holocaust Memorial Museum in Washington, D.C. (June 2009). In the Holocaust Museum incident, the swift actions of a security guard prevented possible mass casualties.

The Smithsonian Institution (Smithsonian) relies on its security guard force to ensure the safety of its staff and visitors. The Smithsonian is a popular tourist destination, with 19 museums (all but 3 in Washington, D.C.) and the National Zoological Park that recorded more than 30 million visits in fiscal year 2017. Additionally, the Smithsonian employs more than 6,700 staff (including about 3,900 federal employees) and has around 6,900 volunteers, 770 research fellows, and numerous interns and contractors at its various locations. The majority of Smithsonian locations are in Washington, D.C., but the Smithsonian also has facilities in 9 states (Arizona, Florida, Hawaii, Maryland, Massachusetts, New Jersey, New York, Pennsylvania, and Virginia) and Panama and Belize.

This audit examined the training, medical and physical, and equipment standards for the Smithsonian's armed security guard force. In addition to reviewing the existing training, medical and physical, and equipment requirements for the Smithsonian's armed security guards, the Office of the Inspector General (OIG) compared them with best practices in minimum standards established by the federal government's Interagency Security Committee (ISC), of which the Smithsonian is an associate member.¹ An Executive Order created the ISC to address security for all U.S. facilities that federal employees occupy for nonmilitary activities. OIG also looked at how the Smithsonian ensured that its unarmed contract security guards met qualification and training requirements.

To determine whether armed security guards received their required training, OIG obtained and reviewed the daily attendance records for all armed guards who were enrolled in basic training classes from 2014 to 2016. OIG also assessed whether security guards on the Smithsonian staff had met refresher training requirements. OIG randomly sampled 84 out of 376 armed security guards in Washington, D.C., as of January 2017, to determine whether they had completed the required training for firearms requalification and first aid certification.²

In order to assess whether the unarmed contract security guards met the qualification and training requirements specified in the Smithsonian's contract, OIG randomly sampled 80 of 307 contract guards stationed in Washington, D.C., as of January 2017, and obtained and reviewed a copy of their District of Columbia security guard licenses and training records from the contractor. A detailed description of OIG's objectives, scope, and methodology can be found in Appendix I.

¹ The ISC *Best Practices for Armed Security Officers in Federal Facilities*, 2nd ed. (Washington, D.C.: April 2013).

² This training includes cardiopulmonary resuscitation and use of an automated external defibrillator.

OIG conducted this performance audit from February 2016 through September 2018 in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide reasonable basis for its findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

BACKGROUND

Smithsonian Institution

Congress created the Smithsonian in 1846 to carry out the provisions of the will of James Smithson, an English scientist who left his estate to the United States to found “an establishment for the increase and diffusion of knowledge.” The Smithsonian includes 19 museums (all but 3 in Washington, D.C.), the National Zoological Park, 9 research centers, and numerous research programs carried out in the museums and other facilities around the world. In fiscal year 2017, there were more than 30 million visits to the Smithsonian museums and the zoo. In addition, more than 150 million people visited the Smithsonian’s public websites.

The funding for a substantial portion of the Smithsonian’s operations is annual federal appropriations. The Smithsonian also receives federal appropriations for the construction or repair and restoration of its facilities. Construction of certain facilities has been funded entirely by federal appropriations, while others have been funded by a combination of federal and private funds. The Smithsonian also receives private support and government grants and contracts and earns income from investments and various business activities. Business activities include Smithsonian magazines and other publications; online catalogs; and theaters, shops, and food services in its museums and centers.

In 2017, Smithsonian owned 577 facilities and leased 28. Within the Washington metropolitan area, there are 41 facilities. The Smithsonian relies on federal and trust funding to support its operations. In fiscal year 2017, the Smithsonian received \$863 million (66 percent) of its funding from federal appropriations and approximately \$442.7 million from other revenue sources. As of March 2018, nearly 60 percent of the Smithsonian’s workforce were federal employees.

Office of Protection Services

The Office of Protection Services (OPS) is responsible for the security of the Smithsonian’s staff, visitors, and property. Each facility has its own security manager who oversees security for that venue. OPS’s Training Division is responsible for training the Smithsonian security guards. The training occurs at the Smithsonian’s Pennsy Collections and Support Center in Hyattsville, Maryland. OPS also uses the Federal Law Enforcement Training Center in Cheltenham, Maryland, for firearms qualification.

As of March 2018, OPS employed approximately 530 security guards, the majority of whom are armed and stationed in Washington, D.C. Their duties include supervising visitor screening, conducting patrols, operating the control rooms, and responding to alarms or other incidents.

OPS hires security guards who are not armed until they graduate from the Basic Entry Level Training (BELT) course and pass their firearms qualification test. In this report, BELT will be referred to as “basic training.”

Basic Training

Basic training classes are provided for new OPS security guards. After completing basic training and firearms qualification, they are promoted to armed security guard positions. The basic training covers such topics as the guards’ role in the organization, their duties and responsibilities, OPS policies, active shooter response, firearms qualification, and other security topics. Guards also receive training on the management of aggressive behavior, the use of pepper spray, baton, handcuffing, first aid, cardiopulmonary resuscitation (CPR), the automated external defibrillator, and other job-related topics.

Unarmed Contract Guards

Since 2010, OPS has contracted with a security services company to provide unarmed guards to monitor exhibition galleries. That contract was modified in February 2016 to add visitor screening to the scope of its work. The contract guards are used to conduct visitor screening at five museums on the National Mall: the National Air and Space Museum, the National Museum of Natural History, the National Museum of American History, the National Museum of the American Indian, and the National Museum of African American History and Culture. As of March 2018, there were more than 360 unarmed contract security guards performing visitor screening and monitoring the exhibition galleries at Smithsonian museums in Washington, D.C.³

Interagency Security Committee

In October 1995, after the bombing of a federal office building in Oklahoma City, Executive Order 12977 created the ISC to address government-wide security for facilities in the United States occupied by federal employees engaged in nonmilitary activities.⁴ These include owned or leased facilities, stand-alone facilities, federal campuses, individual facilities on federal campuses, and special-use facilities.

The ISC, chaired by a representative from the Department of Homeland Security, consists of members from 60 federal departments and agencies and has as its mission the development of security standards and best practices for nonmilitary federal facilities in the United States. Since it is not an executive branch agency, the Smithsonian is not required to follow the ISC’s standards or best practices; however, the Smithsonian is an associate member.⁵

³ Ten contract guards are stationed at Smithsonian facilities in Virginia.

⁴ Federal executive agencies and departments are expected to cooperate and comply with the ISC policies and recommendations.

⁵ According to OPS management, associate members include those entities that participate in working groups but have no voting privileges.

Moreover, Smithsonian officials have used the ISC guidance, supplemented by security policies and recommendations from OPS facility officials, to help determine the types of enhancements to implement.⁶ For example, the Smithsonian voluntarily follows the ISC's Risk Management Process for Federal Facilities as a best practice when assessing physical security risk.⁷ Physical security is the protection of an organization's assets from threats that could cause losses or damages, possibly affecting the operations.⁸

OPS has determined that the security level for Smithsonian museums is very high risk based on the ISC's Risk Management Process.⁹ OPS made this designation in part because the museums are popular destinations for tourists and contain significant original historical records and unique artifacts that could not be replaced in the event of their damage or destruction.

In *Best Practices for Armed Security Officers in Federal Facilities* (April 2013), the ISC recommends a set of minimum standards for hiring, uniforms and equipment, training, and staffing levels for the armed security force in federal facilities. This ISC document defines a minimum set of best practices to be applied to all contract armed security officers working at buildings and facilities in the United States that federal employees occupy for nonmilitary activities. Federal agencies may exceed these recommended best practices, as required, to secure specific facilities or buildings and to fulfill essential mission functions.

The ISC's best practices document defines an armed security officer as a member of a facility security force who is issued a firearm and has the training, equipment, and appropriate certifications to perform security functions. In the best practices document, these individuals are contract personnel. The Smithsonian's armed security guards are Smithsonian employees, and its contract guards are unarmed. OIG used the ISC best practices in minimum standards because they were the only ones for armed security guards posted in nonmilitary federal facilities that are based on a comprehensive and independent job task analysis, which are needed for legally defensible standards. Therefore, we consider these best practices to be reasonable and appropriate for assessing armed security guards in Smithsonian facilities.

RESULTS OF AUDIT

Nearly Three-Quarters of Armed Security Guards Did Not Receive All Required Basic Training Between 2014 and 2016

OPS requires new security guards to attend basic training classes before they can be promoted to an armed security guard position. However, OIG determined that between 2014 and 2016, nearly three-quarters (74 percent) of new guards did not take all the required basic training but

⁶ Government Accountability Office (GAO), *Homeland Security: Actions Needed to Better Assess Cost-Effectiveness of Security Enhancements at Federal Facilities*, GAO-15-444 (Washington, D.C.: March 2015).

⁷ GAO, *National Mall: Actions Needed to Better Manage Physical Security Risks*, GAO-17-679 (Washington, D.C.: July 2017).

⁸ U.S. Department of Homeland Security, *System Assessment and Validation for Emergency Responders* (Washington, D.C.: September 2008).

⁹ ISC, *The Risk Management Process for Federal Facilities: An Interagency Security Committee Standard*, 2nd ed. (Washington, D.C.: November 2016).

still were allowed to graduate from the program. OPS management stated that all armed guards qualify with their firearms before they graduate, even though they may have missed some of the basic training classes. OIG found that OPS has no procedures to ensure that new security guards complete all their basic training classes. However, the majority of guards on staff did complete required refresher training.

OPS Basic Training Requirements for Armed Security Guards

OPS policy, which was last updated in 2001, requires new security guards to complete 80 hours of basic training and an unspecified number of hours of basic weapons training to be armed.¹⁰ OPS has incorporated approximately 28 hours of weapons training in the basic training class. This brings the total hours of basic training to 108 hours. Basic training is intended to acquaint security guards with their role in the organization, describe duties and responsibilities, and highlight critical OPS policies. OPS policy has minimal curriculum requirements such as handcuff and CPR training.

The basic training classes from 2014 to 2016 ranged in length from 120 to 183 hours for each class. The OPS Training Manager said the number of hours of basic training varied because the OPS Deputy Director adjusted the curriculum for each class. Figure 1 (below) shows the class length, individual enrollees, and number of hours attended and missed by each guard for the five classes conducted from 2014 to 2016. The training generally involved 7 hours of instruction each day.

According to the OPS Training Manager, basic training classes were scheduled throughout the year based on the number of new security guards that the Smithsonian hired. Until new security guards complete basic training, they are restricted to working as gallery attendants in museums. According to OPS management, OPS began implementing a formal on-the-job training program in February 2017, which provides training upon reporting for duty.

Between 2014 and 2016, 74 Percent of Armed Security Guards Did Not Complete Basic Training

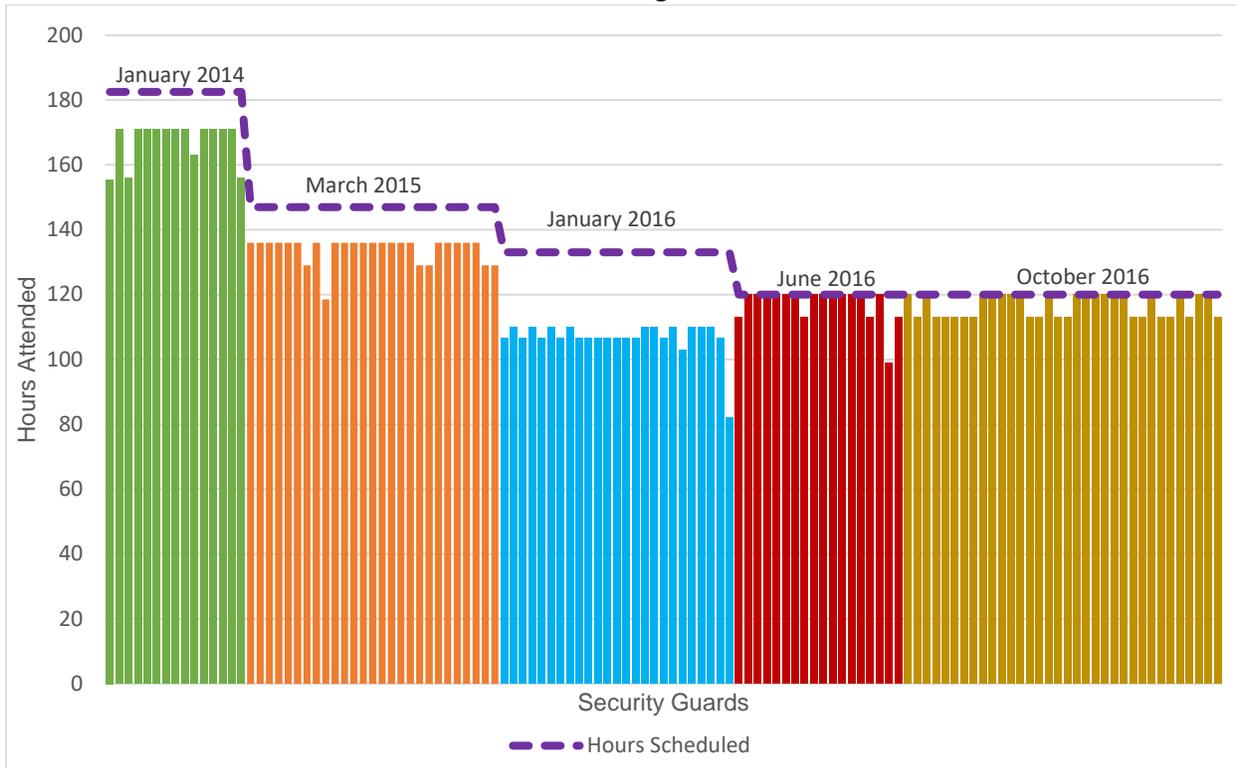
OIG's analysis of attendance records for the five basic training classes conducted from 2014 to 2016 showed that 88 of the 119 guards (74 percent) did not receive all their basic training classes and that only 31 of the guards (26 percent) attended all basic training classes.

Those guards who attended all the basic training classes attended the June 2016 or October 2016 sessions when there were no weather-related closures.

Of the guards who did not attend all their basic training classes, individual guards missed between 1 to 6 full days of instruction. OIG found that on average, each of the 88 guards missed 16 hours of training. Figure 1 illustrates the number of training hours each of the 88 guards missed from 2014 to 2016.

¹⁰ OPS-32, *Training Division* (November 2001).

Figure 1: Nearly Three-Quarters of Security Guards Who Took Basic Training Between 2014 and 2016 Did Not Attend All Scheduled Hours of Training



Source: Office of Inspector General's analysis of basic training class attendance from 2014 to 2016.

Note: Each vertical line represents one of the 119 security guards who attended one of the five basic training classes between 2014 and 2016. Each color represents a different class. The space between the vertical lines and the dashed horizontal line represents the hours of scheduled training that each guard did not attend.

The security guards missed portions of the basic training classes for several reasons, including weather-related government closures. Of the 88 guards missing training classes, 67 were not able to attend due to weather-related closures. Weather-related closures occurred during three of the five basic training classes reviewed, resulting in the loss of from 2 hours to 2 days of instruction. According to the Training Manager, although some topics from the missed classes were covered on other days, the overall training schedule was not extended to ensure that all instruction was provided. Also, 14 guards from the June and October 2016 classes missed 1 day of basic training due to a scheduling conflict with the Smithsonian's New Employee Orientation, which is a regularly scheduled event held on the first workday of a pay period and includes a presentation by an OPS representative. The remaining seven guards were absent from training due to annual leave or for unspecified personal reasons.

These security guards were allowed to graduate without completing all basic training instruction because OPS did not have a policy or procedures to ensure that guards attended all basic training. The OPS Director stated that all training classes are not of equal value and that some are more important than others. The OPS Director has stated that all guards must qualify with their firearm before they can graduate.

If new security guards do not complete all of their basic training, OPS cannot ensure that armed guards have all the knowledge and skills needed to fully protect visitors and staff in Washington, D.C. facilities. Some of the topics scheduled for days when instruction was affected by weather-related closures included reporting and investigating the use of a firearm, radio communications, alarm response, and situational awareness. The 14 guards attending the New Employee Orientation missed various basic training classes such as visitor screening, introduction to x-ray training, mail screening and suspicious packages, and customer/visitor service. Additional details on each of the five basic training classes can be found in Appendix III. OPS gave the security guards who missed instruction full credit for the class and allowed them to graduate even though they did not complete all of their basic training.¹¹

Almost All Armed Security Guards Did Receive Required Refresher Training

To ensure that the guards receive their required refresher training, the OPS Training Division uses a spreadsheet to track completion of the two refresher training classes (annual firearms qualification and first aid every 2 years) and notifies unit security managers monthly about upcoming training classes and who needs to attend them. Smithsonian armed security guards are required to requalify with their firearms annually.¹² This training also includes instruction on the use of batons and pepper spray. In addition, every 2 years armed guards must recertify on first aid.

OIG reviewed training records for a random sample of 84 of 376 armed security guards stationed in Washington, D.C., to assess whether they met refresher training requirements. OIG's analysis showed that as of April 2017, 5 of 84 armed guards (about 6 percent) did not meet annual refresher training requirements:

- Two guards did not complete their annual requalification on firearms. One guard requalified 3 months late. The second guard should have requalified in February 2017, but, according to OPS management, the guard was placed on a limited duty status with a firearms restriction in January 2017. The guard remained in limited duty status until the guard's employment ended in December 2017.
- Two other guards were 1 month late in completing their first aid certification.
- A fifth guard was 3 months late in meeting the annual firearms requalification and completing the first recertification.

Based on the results of this review, OIG estimates that 354 of the 376 armed security guards (94 percent) have met refresher training requirements as of April 2017.¹³

¹¹ However, according to OPS, those guards were required to complete their firearms training before becoming armed security guards.

¹² OPS Policy Memorandum 31, *Safeguarding and Qualification of Firearms* (Washington, D.C.: March 3, 2016).

¹³ The estimate is at the 95-percent confidence level and has a margin of error of plus or minus 6 percent or less.

According to an OPS deputy director, beginning in 2017, the guards have been allowed to requalify on their weapons within the calendar year quarter that their requalification is due rather than on a specific date. For example, guards whose firearms qualification expires on February 1 would have until the end of the first quarter, meaning by March 31, to requalify on their firearms. According to OPS management, this provides greater flexibility in scheduling guards for requalification. However, this raises the possibility that guards may go longer than a year before they requalify, which violates OPS policy.

OPS Basic Training Meets or Partially Meets Most of the ISC Best Practices but Does Not Meet Recommended Firearms Qualification

The ISC recommends a total of 148 hours of training in eight subject areas for armed security guards. The ISC also specifies topics to be covered and a recommended number of hours for each subject areas. OIG's analysis found that OPS basic training exceeded the number of the ISC recommended training hours in one area, fully met the ISC's recommendations in a second, and partially met the ISC's recommendations in six areas. However, OPS does not meet the ISC's recommendations on firearms qualification. The ISC's minimum requirement is for armed guards to qualify on firearms twice a year, but OPS requires qualification only once a year. Because OPS basic training and firearms qualifications do not meet the ISC best practices, OPS armed security guards may not possess all the proper skills needed to protect staff and visitors in Washington, D.C.

OPS Exceeds or Fully Meets the ISC Training Hour Standards in Two Areas and Partially Meets the ISC Best Practices in Six Areas

To assess how OPS basic training aligns with the ISC's recommended best practices, OIG compared the October 2016 basic training class schedule with the minimum number of required training hours for eight major training subject areas.¹⁴ These subject areas correspond to critical tasks for armed security guards. The ISC also recommends that a percentage of the training in each subject area be hands-on versus classroom training. However, OPS was not able to provide information on how much of the basic training was hands-on. Therefore, OIG was not able to assess the extent to which OPS's basic training aligns with the ISC's recommended best practices for hands-on training.

As shown in table 1, OPS's October 2016 basic training class fully met the ISC's best practice recommendation for 9 hours of general job-related training and 2 hours of patrol methods and hazards training. In addition, OPS nearly met the ISC's recommended number of 11 hours for law enforcement support by providing 10 hours. However, the total number of basic training hours (103.25) fell short of meeting the ISC's total recommended number of hours (148).

¹⁴ Basic training class consists of 120 hours, of which 103.25 hours are the ISC-related instruction; 16.75 hours are administrative or the non-ISC-related discussions, such as class overviews and graduation ceremony.

Table 1: Comparison of Interagency Security Committee Best Practices for Armed Security Guards Training and Office of Protection Services October 2016 Basic Training Class Hours

ISC Training Subject Area	ISC Minimum Training hours	OPS Basic Training Hours for the October 2016 Class	OIG Comparison of OPS to ISC
General Job Related Training <ul style="list-style-type: none"> Overview of the agency and roles and responsibilities Ethics and professionalism Post duties 	9	10	●
Human Interaction and Customer Service <ul style="list-style-type: none"> Principles of communication Professional public relations Understanding human behavior (psychology) 	20	11.5	◐
Weapons and Defensive Tactics <ul style="list-style-type: none"> Defensive tactics Use of handcuffs, intermediate weapons, and firearms 	64	47.25	◐
Inspections (visitor screening) <ul style="list-style-type: none"> Screener training Examining identification and credentials 	12	5	◐
Law Enforcement Support <ul style="list-style-type: none"> The law, legal authorities, jurisdiction, and responsibilities Crimes and offenses, crime detection, assessment, and response Search and seizure Authority to detain and use of force Crime scene protection and rules of evidence 	11	10	◐
Patrol Methods and Hazards <ul style="list-style-type: none"> Importance of patrol methods and patrol hazards 	2	2	●
Communication <ul style="list-style-type: none"> Records, reports, and forms Communications equipment 	6	0.75	◐
Emergency Response <ul style="list-style-type: none"> General response procedures and safety and fire prevention Special situations Code Adam (missing child) Terrorism, anti-terrorism, and weapons of mass destruction Bomb threats and incident Hostage situations, sabotage, and espionage Civil disturbances Workplace violence and active shooter Cardiopulmonary resuscitation (CPR), automatic external defibrillator (AED), first aid Emergency communications 	24	16.75	◐
TOTAL HOURS	148	103.25	(44.75)

Key	
●	Meets ISC Best Practice
◐	Partially Meets ISC Best Practice

Source: Office of the Inspector General (OIG) analysis of the Interagency Security Committee's (ISC) *Best Practices for Armed Security Officers in Federal Facilities* (April 2013), Table 6-5, and October 2016 Office of Protection Services' (OPS) basic training class schedule.

Note: OIG analysis does not include the extent to which OPS's basic training aligns with the ISC's recommended best practices for hands-on training.

However, OPS falls short of meeting the ISC training best practices in these five areas:

- Human interaction and customer service (ISC 20 hours, OPS 11 ½ hours),
- Weapons and defensive tactics (ISC 64 hours, OPS 47¼ hours),
- Inspections for visitor screening (ISC 12 hours, OPS 5 hours),
- Communications (ISC 6 hours, OPS 45 minutes), and
- Emergency response (ISC 24 hours, OPS 16¾ hours).

The ISC's recommendations recognize that guards are the first-line representatives of the organization being protected and spend the majority of their duty day interacting with the public. The ISC says developing human interaction and customer service skills is essential to effective job performance in providing security. Developing these skills will help gain public trust, support, and compliance. Strong conflict management skills can often minimize or completely stop a negative situation. Strong communication and sound judgment skills can help mitigate potential threats or deter troublemakers and notify other security team members of a potential problem.

OPS management stated that the armed guards' basic training course was developed based on OPS's own knowledge and experience, as well as best practices from other museums and organizations. Furthermore, the Director of OPS also stated that incorporating all the ISC's best practices was not practical for the Smithsonian.

The OPS training policy has not been updated since 2001. This conflicts with Smithsonian policy that states that managers should review directives, associated manuals, and supplementary information every 3 years, or more often if necessary, to determine whether changes are needed.¹⁵ The ISC published its best practice in minimum standards for armed security officers in April 2013.

OPS did hire a consultant in February 2016 to assess its training program and to perform a benchmark comparison between Smithsonian training and similar organizations and best practices developed by relevant associations. Among the best practices the consultant reviewed were those that the ISC published.

The OPS consultant issued a report in November 2016 that identified a number of training gaps. The consultant recommended:¹⁶

- the need for firearm practice twice a year,
- additional writing and computer skills training,
- training on how to handle an individual who becomes physically violent or who resists handcuffing (contact control), and
- additional training for constitutional rights relating to unreasonable search and seizure and due process.

¹⁵ Smithsonian Directive 100, *Smithsonian Directives* (Washington, D.C.: May 30, 2017)

¹⁶ Applied Research Associates, Inc., *Training and Developmental Needs Assessment: Findings and Recommendations* (Vicksburg, MS: Nov. 8, 2016).

The consultant's recommendations align with three ISC subject areas of weapons and defensive tactics, communications, and law enforcement support, all areas where the OPS's basic training partially meets the ISC's best practices in the number of training hours provided. The OPS consultant also surveyed and interviewed OPS security guards, supervisors, and trainers to elicit feedback on training needs. The consultant reported receiving multiple comments on the need for additional active shooter training. According to the OPS Deputy Director of Business Operations and Physical Security, in January 2017, the active shooter training provided to guards was expanded in their annual refresher training.

The ISC Recommends Firearms Qualification Twice a Year but OPS Requires Annual Requalification

The ISC's best practices state that armed security guard training should maintain the highest focus on public safety. According to the ISC, in order to sustain training proficiency, it should be mandatory for armed security guards to qualify semiannually with firearms; however, OPS armed guards in Washington, D.C., museums are required to qualify annually.¹⁷

According to the OPS Director, the OPS budget cannot support the additional employees needed to cover posts to allow armed security guards to attend firearms qualification training twice a year. In addition, she said it is difficult to schedule time at the firing range, which multiple federal agencies use. Finally, the Director also stated that the revolvers that armed guards use are not as complicated as a semiautomatic weapon and, therefore, qualifying once a year is sufficient. However, the ISC does not differentiate between the type of weapon being used in its semiannual firearms qualification standard.

Because OPS basic training for armed security guards does not meet the minimum federal best practices published by the ISC, and firearms qualification is required only once a year, OPS armed security guards may not possess all the proper skills needed to protect staff and visitors in Washington, D.C.

The Smithsonian Has Minimum Medical and Physical Requirements for Armed Security Guards and No Independent Verification That They Are Met

OPS has minimum medical and physical requirements for its armed security guards and has no independent verification by a physician that those requirements are met. To ensure that its armed guards are medically and physically fit, the Smithsonian uses only the minimal medical requirements in the Office of Personnel Management's (OPM) individual occupational standards for security guards, as follows:¹⁸

¹⁷ OPS does require firearms qualification at least twice a year for individuals issued semiautomatic weapons, meaning the security guards at the Smithsonian's Environmental Research Center and the Smithsonian's National Zoological Park Police. These guards and police were not within the scope of this audit.

¹⁸ OPM, *Classification & Qualifications – General Schedule Qualification Standards* for job series 0085 security guard (Washington, D.C.: May 2016).

- good near and distant vision,
- the ability to distinguish basic colors, and
- the ability to hear the conversational voice.

The Smithsonian also includes general physical requirements from OPM in its position description for security guards.¹⁹ According to the position description, the work of security guards requires physical exertion such as long periods of standing, walking, bending, stooping, reaching, crawling, as well as lifting and carrying of heavy objects of up to 50 pounds. The position description says security guards may have to climb stairs in buildings and work in close and confined spaces; the position requires agility and ability to subdue violent suspects; and guards may have to defend themselves or others against a physical attack. However, OPS does not verify that the applicants have the ability to perform these duties.

In addition to the OPM's minimal requirements, agencies may establish additional job-related physical or medical requirements provided that the specific requirements relate to the position's duties. The Smithsonian has not added additional medical or physical requirements.

To ensure that armed security guards meet OPS medical and physical requirements, applicants for security guard positions answer yes-or-no questions related to vision, ability to subdue suspects, and any physical impediments to the use of firearms. There are no questions related to the OPS hearing requirements or the ability to distinguish basic colors. OPS has no policies or procedures requiring a doctor's certification that the medical information provided by the security guard applicants is accurate. OPS also has no procedures to ensure that security guards continue to meet these medical requirements once they are hired.

After a security guard is hired, OPS has two ways it can become aware of any medical and physical issues with security guards: (1) a guard requests limited duty due to a physical or medical issue or (2) the unit security manager refers a guard to the Smithsonian Occupational Health Services for evaluation if the manager suspects the guard cannot perform the job duties. Guards who fall into either category can be placed on limited duty for up to 8 months.²⁰ After the limited duty expires, guards must either return to their regular duties, take leave, find another position within the Smithsonian, or resign. OPS has no procedures requiring independent verification, such as a doctor's certification, that security guards meet the medical and physical requirements, either at the time they are hired or once they are on staff.

OPS Medical and Physical Requirements Do Not Align with the ISC Recommended Minimum Standards

In contrast to OPS's general medical and physical requirements, the ISC has specific recommended minimum medical and physical standards for armed security guards at facilities occupied by federal employees. (See table 2.) The ISC's medical and physical standards address vision, hearing, cardiovascular system, musculoskeletal system, and general health.

¹⁹ OPM, *Grade Evaluation Guide for Police and Security Guard Positions in Series, GS-0083, GS-0085*, (Washington, D.C.: April 1988)

²⁰ OPS-24, *Personnel Assignments* (Washington, D.C.: September 2017)

Table 2: Comparison of the Interagency Security (ISC) Committee's Recommended Minimum Medical and Physical Standards to the Office of Protection Services (OPS) Requirements

ISC Category	ISC Recommended Minimum Standards	OPS Requirements
Vision	<ul style="list-style-type: none"> • 20/30 vision while using both eyes • Normal color vision • No peripheral vision deficits, night blindness, or visual conditions that may prevent successful task performance 	<ul style="list-style-type: none"> • Good near and distant vision • Ability to distinguish basic colors
Hearing	<ul style="list-style-type: none"> • Average hearing across 500, 1000, 2000, and 3000 Hertz is less than or equal to 25 decibels • Hearing at 4000 and 5000 Hertz levels is less than or equal to 45 decibels • No inner, middle, or outer ear disorders affecting equilibrium 	<ul style="list-style-type: none"> • Ability to hear the conversational voice
Cardiovascular System	<ul style="list-style-type: none"> • Possesses adequate aerobic capacity: minimum 9 metabolic equivalents (METs) or 31.5 milliliter/kilogram/minutes maximal oxygen consumption, during standardized aerobic capacity test (step box, treadmill, or step mill for 6 minutes) • Maximum resting blood pressure of 180 systolic, 90 diastolic (120 over 80 millimeters of mercury) 	None
Musculoskeletal System	<ul style="list-style-type: none"> • Exhibits full range of motion • Able to easily get down to and up from a kneeling position • Able to lift 40 pounds minimum from floor to waist • Able to bench press at least 40 percent of his or her body weight • Able to perform sit-ups and push-ups continuously for at least 30 seconds 	<ul style="list-style-type: none"> • Physical exertion such as long periods of standing, walking, bending, stooping, reaching, crawling, and similar activities • Ability to lift or carry objects weighing 50 pounds or less • Agility and ability to subdue violent suspects
General Health	<ul style="list-style-type: none"> • No loss of sense of smell or ability to speak (aphonia), or other abnormalities of the nose, throat, or ears that may prevent successful task performance • No evidence of chronic bronchitis, emphysema, infectious pulmonary tuberculosis, or other respiratory abnormalities that may prevent successful task performance • No evidence of eczema, psoriasis, dermatitis, or other dermatological condition that may prevent successful task performance • No evidence of a gastrointestinal issue that may prevent successful task performance or prevent the candidate from being able to stand or walk continuously for eight hours without regular access to a restroom 	None

Source: Office of the Inspector General analysis of Interagency Security Committee *Best Practices for Armed Security Officers in Federal Facilities*, and Smithsonian Institution security guard position description.

The specific ISC recommended minimum standards as compared to OPS requirements include the following:

- a. The ISC recommends 20/30 correctable vision and normal color vision; OPS vision requirements state that guards must have good near and distant vision as well as the ability to distinguish basic colors.

- b. The ISC recommends that guards must have average hearing across various Hertz levels; OPS requirements state that guards must have the ability to hear conversational voices.²¹
- c. The ISC specifies that security guards should be able to lift 40 pounds, bench press at least 40 percent of their body weight, and perform sit-ups and push-ups for at least 30 seconds. OPS only requires guards to be able to lift or carry objects weighing up to 50 pounds, and there are no verification procedures to ensure that these requirements are met.

The ISC also recommends additional minimum medical standards that OPS does not have, including:

- specific blood pressure levels,
- no evidence of medical conditions that prevent performance of duties, and
- a medical examination and physician's clearance.

OPS Plans to Develop Medical and Physical Requirements for Armed Security Guards but Does Not Have Target Dates for Implementation

OPS has identified tasks to implement new medical and physical standards for armed security guards and has taken positive steps to improve medical requirements and will address physical qualification requirements next. While OPS management has been working on this process since 2015, it has no target completion date for the implementation of the new standards or interim milestones for completing the individual tasks. Such targets can help assess progress in updating these standards.

The Smithsonian hired a physician as the Director of Occupational Health Services in October 2016, and OPS has worked with the physician to develop medical standards for security applicants and the armed security guard force.

OPS has submitted the new medical standards to OPM. In February 2018, OPM had approved OPS's request to establish new medical standards and physical qualification requirements for security positions, but a number of other steps were necessary before the new standard could be implemented.

Implementing new medical standards is a complicated effort that requires a considerable investment of time and resources. The coordination of new standards involves multiple Smithsonian units, including OPS, the Office of Human Resources, Occupational Health Services, and the employee union, as well as approvals from OPM. OPS has developed a list of tasks to be completed in order to implement medical standards and completed four of them, which resulted in OPM approving OPS's request to establish new medical and physical qualifications. As of the date of this report, the remaining eight tasks are as follows:

²¹ Hertz are a standard unit of measurement used for measuring the frequency of sound waves.

1. Create a medical and physical standards policy.
2. Review of policy by OPS, the Office of Human Resources, the Office of the General Counsel, and the Office of Labor and Employee Relations.
3. Notify the union of the proposal.
4. Create a certification/recertification procedure.
5. Rollout medical/physical standards for pre-hire screening.
6. Track medical and physical evaluations.
7. Create self-evaluation form for current OPS guards.
8. Rollout medical/physical standards for post-hire screening.

Without an enhanced set of medical and physical standards for its armed security guards, the Smithsonian is at risk that its guards cannot effectively respond to emergencies and protect staff and visitors.

OPS Equipment Requirements Generally Meet the ISC Best Practices for Equipment Except for Body Armor

Of the 10 ISC equipment best practices for armed security guards, OPS fully met 7, partially met 2 (ammunition and particulate respirator), and did not meet 1 (body armor) of them. (See table 3.) However, at the time of this report, the Smithsonian was assessing the need for body armor for all armed security guards due to an occupational safety and health violation at the National Museum of Natural History.

According to OPS-12, *Uniform Guidelines*, OPS provides its armed security guards with a baton, firearm, flashlight, handcuffs, pepper spray, radio, and a whistle, fully meeting 7 of the 10 ISC equipment best practices.

OPS partially meets two of the ISC equipment best practices relating to the quantity of ammunition provided and the availability of particulate respirators. The ISC's standards state that guards should be issued a specific amount of ammunition, but OPS policy does not specify the quantity of ammunition that should be issued to guards carrying revolvers. OPS management stated that particulate respirators are plentiful and available at each Smithsonian facility. However, the ISC recommends that they be issued to individual guards, which OPS does not do.

The ISC recommends that body armor be provided to all armed security guards. At the time of this report, OPS was providing body armor to the 29 National Zoological Park police officers and the 30 guards at the Smithsonian Environmental Research Center in Edgewater, Maryland, but not to the 376 armed security guards stationed in Washington, D.C. According to OPS management, OPS provides body armor to the National Zoological Park police and the Smithsonian's Environmental Research Center guards because of the nature of their duties and because visitors are not screened before entering those facilities, creating a greater risk for harm.

However, OPS is reviewing its policy regarding body armor for armed security guards in Washington, D.C., because the Smithsonian received a safety violation notice from the Occupational Safety and Health Administration on February 2, 2017. The violation, classified as

serious, involved armed security guards at the National Museum of Natural History (Natural History).²² To settle the violation, the Smithsonian agreed to conduct an assessment at Natural History to determine what personal protective equipment, such as bullet-resistant vests (body armor) and ballistic shields, must be issued to armed security guards.

Table 3: Comparison of the Interagency Security Committee (ISC) Equipment Best Practices for Armed Security Guards with the Office of Protection Services (OPS) Requirements for Armed Security Guards at Museums in Washington, D.C.

ISC Best Practices for Armed Security Guards' Equipment	Comparison of OPS's Equipment Requirements to ISC's Best Practices
Body Armor	○ ^a
Police Baton	●
Firearm	●
Flashlight	●
Handcuffs	●
Ammunition: 3 Magazines or 2 Speed Loaders	◐ ^b
Disposable Particulate Respirator	◑ ^c
OC Canister (pepper spray)	●
Communication Device	●
Whistle	●

KEY	
●	Smithsonian Policy Meets the ISC Best Practice
◐	Smithsonian Policy Partially Meets ISC Best Practice
○	Smithsonian Policy Does Not Meet ISC Best Practice

Source: OPS-12, *Uniform Guidelines* (July 31, 2014) and Interagency Security Committee *Best Practices for Armed Security Officers in Federal Facilities* (April 2013), Table 6-4.

Notes:

- (a) According to OPS management, no security guard in Washington, D.C., has been issued body armor, based on the risk associated with their duties.
- (b) OPS policy does not specify quantity of ammunition.
- (c) According to OPS management, respirators are available at each unit, but are not issued to individual guards.

As a part of the agreement, the Smithsonian agreed to identify funding to equip armed guards at Natural History with the required personal protective equipment. The Smithsonian must negotiate with the union, procure the personal protective equipment, and train the armed security guards at Natural History on the use of the equipment.

The Smithsonian also agreed to provide the Occupational Safety and Health Administration with a plan to (1) complete the same assessment of personal protective equipment for all other Smithsonian facilities where armed security guards are present; and (2) identify funding and

²² The Occupational Safety and Health Administration classifies violations as the following types: serious, willful, repeat, or other.

procuring the appropriate personal protective equipment, where necessary.²³ The Smithsonian agreed to make reasonable, good-faith efforts to implement the negotiated plan. Whatever steps are needed to implement the agreement must be completed no later than September 15, 2018.

Properly equipping armed security guards is essential to the safety of Smithsonian staff and visitors. Without the proper equipment, OPS armed guards' safety is at risk, and they may not be able to adequately perform their duties.

OPS Does Not Monitor the Qualification and Training of Unarmed Contract Security Guards

Since 2010, the Smithsonian has supplemented its armed security force in Washington, D.C., with unarmed security guards that a contractor provides.²⁴ These unarmed guards must meet District of Columbia regulations and OPS contract requirements for qualification and training. OIG found that OPS has relied on the contractor to ensure that the contract guards are qualified and trained and has not verified that the unarmed guards meet the contract requirements. Neither OPS nor the contractor maintains records to ensure that all contract guards have received the training required in the contract. Additionally, OPS does not verify that all contract guards have the required D.C. security guard licenses.

Unarmed Contract Security Guards Must Meet Local Regulations and OPS Contract Requirements

According to the OPS contract, all contract guards must comply with state and local registration and licensing laws and regulations for security officers. To comply with this requirement in the District of Columbia, all contract guards must meet health, training, criminal background check, and other requirements to obtain a security guard license from the Metropolitan Police Department's Security Officers Management Branch. Once applicants meet all Washington, D.C., regulations, they are issued an identification card that is to be in their possession whenever they are engaged in security guard duties and exhibited upon request. This license must be renewed every 2 years.

In addition, the OPS contract has the following training requirements:

- thirty-two hours of visitor screener training for contract guards with screening duties, and
- sixteen hours of classroom training conducted by the Smithsonian in subjects related to museum security, including Smithsonian chain of command, OPS policies, and an overview of and familiarity with the Smithsonian.

²³ The agreement is limited to Smithsonian facilities located within the Occupational Safety and Health Administration's Region 3, which includes the District of Columbia, Maryland, and Virginia.

²⁴ The unarmed contract guards monitor exhibition galleries at museums and provide visitor screening at the Smithsonian's five busiest museums on the National Mall: the National Air and Space Museum, the National Museum of Natural History, the National Museum of American History, the National Museum of the American Indian, and the National Museum of African American History and Culture.

OPS Did Not Ensure that Unarmed Contract Security Guards Met Qualification and Training Requirements

At the Smithsonian, the Contracting Officer's Technical Representative (COTR), an OPS employee, is responsible for ensuring that contract requirements are met. But OIG found that the COTR is not monitoring the unarmed contract security guards to ensure that they have D.C. security guard licenses, which is proof of their qualifications. The COTR said he relies on the contractor to ensure that each guard has the required D.C. guard license at the start of each shift.

To determine whether the unarmed contract security guards met the qualification requirements specified in the Smithsonian's contract, OIG randomly sampled 80 of 307 contract guards stationed in Washington, D.C., and reviewed a copy of their District of Columbia security guard licenses. The contractor was able to provide the D.C. security guard licenses for 79 of the 80 guards who were part of the OIG's sample. Based on the results of this review, OIG estimates that 303 of the 307 contract guards (99 percent) have D.C. licenses.²⁵

Additionally, the contract states that proof of "successful completion of training shall be submitted to the COTR." However, the contract does not specify when and how often the contractor should submit this information. As of January 2017, OIG found that the COTR had not received or requested any evidence of contract guard training as required by the contract. An OPS Deputy Director also stated that this information had not been collected since the contract was executed in 2010.

Because the COTR did not maintain training records for the unarmed contract security guards, OIG requested that the contractor provide evidence of training. The contractor was able to produce documentation for 24 of the 32 hours of screener training that OPS required in the contract. According to an OPS deputy director, the remaining 8 hours of training were conducted on-site at the museums. However, no records exist to confirm that this training occurred.

Neither the contractor nor the COTR could provide a list of unarmed contract security guards assigned as visitor screeners. Therefore, the contractor and the COTR could not provide support that all guards conducting screening have been trained according to contract requirements. In addition, neither the contractor nor the COTR has records to demonstrate that contract guards have completed the 16 hours of required, Smithsonian-provided training.

Ensuring that unarmed contract security guards are properly trained and qualified is vital to the safety of Smithsonian staff and visitors. Failure to obtain evidence that the contract guards are adequately trained and licensed to work in Washington, D.C., can endanger Smithsonian staff and visitors.

²⁵ This estimate is at the 95-percent confidence level and has a margin of error of plus or minus 5 percent or less.

CONCLUSIONS

A well-trained, professional security guard force is imperative to protect the safety and well-being of Smithsonian staff and visitors at Smithsonian museums in Washington, D.C. However, three-fourths of the security guards trained between 2014 and 2016 did not receive all the required basic training because OPS has no policies or procedures to ensure that all required basic training is completed. In addition, OPS has not revised its training policy for armed security guards since 2001, although a 2016 consultant study identified a number of training gaps. Moreover, OPS's basic training fell short of meeting the ISC's best practices in five of the eight major training subject areas that correspond to critical tasks for armed security guards.

Furthermore, OPS policies relating to medical and physical requirements, firearms qualification, and equipment for armed security guards do not align with the ISC's recommended best practices. OPS is working to establish minimum medical standards and plans to develop physical requirements but has no target completion date or interim milestones to complete this multiyear effort.

Since 2010, OPS has had a contract for unarmed security guards to supplement its security guard force but has relied on the contractor to ensure that unarmed guards meet the contract qualification and training requirements. Moreover, OPS had not performed an independent verification of compliance with these requirements. Furthermore, neither OPS nor the contractor could identify unarmed guards with visitor screening duties or confirm that they had received required training.

RECOMMENDATIONS

To ensure that armed security guards receive appropriate training, OIG recommends that the Director of OPS:

1. Develop a standard curriculum for the basic training program to establish a minimum number of required classroom and hands-on training hours for the eight major subject areas that correspond to critical tasks for armed security guards.
2. Develop and implement procedures to ensure that guards receive all basic training classes before they graduate from the basic training program.
3. Assess the costs and benefits of adopting the ISC's best practice to require semi-annual firearms qualifications for all armed security guards.

To ensure that armed security guards are medically and physically fit for duty, OIG recommends that the Director of OPS:

4. Establish interim milestones for completing the remaining tasks to develop medical and physical standards and a target completion date for implementing these standards.

To ensure that armed security guards at the Smithsonian's facilities are properly equipped to respond to emergencies, OIG recommends that the Director of OPS:

5. Clarify its policy to specify the required amount of ammunition for armed security guards carrying revolvers.

To ensure that OPS has a well-qualified, unarmed guard force, OIG recommends that the Director of OPS direct the COTR to:

6. Develop and implement procedures to periodically assess that the unarmed guards meet the contract qualification and training requirements.
7. Establish and implement a process to identify the unarmed guards who conduct visitor screening and periodically assess that they have met the training requirements.

MANAGEMENT RESPONSE AND OIG EVALUATION

OIG provided a draft of this report to Smithsonian management for review and comment. In its written comments, which are reproduced in their entirety in Appendix III, management generally concurred with all seven recommendations and outlined efforts underway or planned to address them.

For recommendation 1 to establish a minimum number of required hours for eight subject areas in the armed security guards' basic training program, management concurred, with specific exceptions. Management took exception to OIG's findings and conclusions because OIG compared the Smithsonian's basic training program for its armed security guards to the ISC's recommended best practices for training armed security officers working in U.S. buildings occupied by federal employees for nonmilitary activities. These recommended best practices are the only ones that OIG identified to be based on a comprehensive and independent job task analysis for armed security guards, which is needed for legally defensible standards. In *The ISC Best Practice Standards for Armed Security Officers in Federal Facilities*, the ISC states that agencies may exceed these minimum recommended best practices to adequately secure specific facilities and to fulfill essential mission functions. Given the diverse range of U.S. buildings with federal employees for nonmilitary activities, OIG believes that the ISC's recommended best practices are sound and reasonable for assessing armed security guards in Smithsonian facilities. OIG's recommendation is not meant to limit the Smithsonian to only considering the ISC recommended best practices in developing its training requirements. During this audit, OPS provided multiple benchmark studies to OIG, but only one was relevant to our audit objective, a consultant study on OPS's training and development needs. This consultant benchmarked against the ISC best practices as well as other similar organizations. The consultant made four training recommendations that aligned with three ISC subject areas: weapons and defensive tactics, communications, and law enforcement. OIG also identified a shortage of training hours in these subject areas as compared to the ISC.

Regarding recommendation 2 to develop and implement procedures to ensure guards receive all required instruction before they graduate from the basic training program, management concurred with specific exceptions. OPS stated that not all training classes are of equal

importance and that it is not reasonable or cost-beneficial for guards to take all training classes prior to being armed and commissioned. Based on management's response, we have clarified that the recommendation is only directed to the basic training that OIG reviewed. This is in line with OPS policy, which states that security guards are required to complete the basic training course before reporting for duty at their respective security units. OIG found that 74 percent of the guards in the 2014 to 2016 basic training classes missed an average of 16 hours of training. These classes ranged from 120 to 183 hours. According to OIG's analysis, some of the class topics missed included reporting and investigating the use of a firearm, radio communications, alarm response, situational awareness, introduction to x-ray training, visitor screening, mail screening and suspicious packages, and customer/visitor service. OIG considers these topics to be important. In line with this policy, OIG is recommending that OPS establish procedures to ensure that its armed security guards meet these basic training requirements.

For recommendations 3, 4, and 5, OPS concurred, and OIG believes the proposed actions will meet the intent of these recommendations.

For recommendations 6 and 7, OPS concurred, but did not fully comment on how OPS will implement these recommendations.

Appendix I

OBJECTIVES, SCOPE, AND METHODOLOGY

This audit examined how the Smithsonian Institution's (Smithsonian) Office of Protection Services (OPS) ensured that its armed security guard force met its training, medical and physical, and equipment requirements and how OPS's requirements align with best practice in minimum standards established by the federal government's Interagency Security Committee (ISC).²⁶ In addition, the Office of the Inspector General (OIG) examined how OPS ensured that unarmed contract guards met qualification and training requirements specified in the Smithsonian's contract.

To identify OPS's training requirements for armed security guards, OIG interviewed OPS management as well as OPS staff in the Training Division to learn about basic and refresher training requirements and their efforts to improve their training requirements. OIG also reviewed relevant OPS policies: OPS Policy Memorandum 31, *Safeguarding and Qualification of Firearms* (March 2016); OPS-24, *Personnel Assignments* (September 2017 vs. June 2015); OPS-67, *Active Shooter Response* (September 2014); OPS-55 *Public and Staff Screening Procedures* (October 2013); and OPS-32, *Training Division* (November 2001). In addition, OIG reviewed the 2016 training and developmental needs assessment report from Applied Research Associates, a consultant that OPS hired, which included a comparison between the Smithsonian and similar organizations and best practices (including the ISC) for training.

To determine how OPS ensured that newly hired armed security guards received the required basic training, OIG obtained and reviewed the daily attendance records and course schedules for all armed security guards who were enrolled in the five basic training classes that OPS held from 2014 to 2016. OIG performed analysis of the documentation for each class, reviewing attendance, weather-related closures, and absences. OIG also met with OPS staff in the Training Division to discuss any adjustments to the training schedule and to obtain additional documentation related to attendance and absences.

In addition, OIG assessed how OPS's basic training compares to the ISC's recommended best practices for training armed security guards. To do this comparison, OIG selected the October 2016 basic training class (the last of the five classes reviewed) because of the large variations in the topics and the number of training hours among the five classes. OIG reviewed the course topics provided in the October 2016 basic training class and compared them to the ISC's eight major training subject areas that correspond to critical tasks and the minimum required number of training hours.²⁷ OIG analysis did not include an assessment of the extent to which OPS's basic training aligns with the ISC's recommended best practices for hands-on training because OPS was not able to provide information on how much of its basic training was hands-on.

²⁶ The ISC, *Best Practices for Armed Security Officers in Federal Facilities*, 2nd ed. (Washington, D.C.: April 2013).

²⁷ The ISC, *Best Practices for Armed Security Officers in Federal Facilities*, Section 6.3 Training, 2nd ed. (Washington, D.C.: April 2013).

OIG also assessed whether security guards on the Smithsonian's staff had met refresher training requirements. OIG randomly sampled 84 out of 376 armed security guards as of January 2017 in Washington, D.C., to determine whether they had completed the required refresher training for firearms requalification and first aid certification.²⁸ Based on this sampling method, OIG can project the results to the population. OIG obtained firearms scorecards, first aid cards, or other corroborating documentation for the selected guards as proof they had completed required firearms requalification as well as first aid and cardiopulmonary resuscitation (CPR) training.

To identify OPS's medical and physical requirements for armed guards, OIG met with representatives from OPS and the Office of Human Resources to discuss these requirements and obtain related documentation. OIG also reviewed the U.S. Office of Personnel Management's minimum standards for security guards. In addition, OIG met with OPS representatives to discuss their ongoing efforts and plans to update these requirements. OIG reviewed and analyzed OPS's medical and physical requirements and compared them to the ISC's recommended minimum criteria for medical and physical standards for armed security guards.²⁹

OIG identified OPS's equipment requirements for armed guards by reviewing OPS-12, *Uniform Guidelines* (July 2014), and meeting with OPS representatives to discuss current requirements. OIG also discussed the Smithsonian's violation notice from the U.S. Department of Labor's Office of Safety and Health Administration. The violation related to personal protective equipment for armed security guards at the National Museum of Natural History. In addition, OIG evaluated how OPS' equipment requirements align with the ISC's recommended equipment for armed security guards.³⁰

OIG assessed how OPS ensured that the unarmed contract security guards in Washington, D.C., met the qualification and training requirements specified in the Smithsonian's contract. OIG discussed the training, qualification, and oversight procedures with management representatives for OPS and the contractor. OIG obtained and reviewed the unarmed guard contract to determine the training and qualification requirements for the unarmed guards. OIG obtained and reviewed the District of Columbia regulations for unarmed security guards. OIG

²⁸ OIG randomly selected a probability sample from the population of contract guards working at the Smithsonian museums in Washington, D.C., as of January 2017. Because OIG followed a probability procedure based on random selections, OIG's sample is only one of a large number of samples that OIG might have drawn. Since each sample could have provided different estimates, OIG expresses confidence in the precision of its particular sample's results at a 95-percent confidence interval (e.g., plus or minus 6 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples that OIG could have drawn. As a result, OIG is 95 percent confident that the confidence intervals in this report will include the true values in the study population. All percentage estimates from the sample of contract guards have a sampling error (confidence interval widths) of plus or minus 6 percentage points or less.

²⁹ The ISC, *Best Practices for Armed Security Officers in Federal Facilities, Section 6.1 Minimum Criteria for Hiring an Armed Security Officer*, and *Appendix B: Recommended Minimum Medical and Physical Standards for an Armed Security Officer*, 2nd ed. (Washington, D.C.: April 2013).

³⁰ The ISC, *Best Practices for Armed Security Officers in Federal Facilities, Section 6.2.3 Armed Security Officer Issued Equipment*, 2nd ed. (Washington, D.C.: April 2013).

also met with the Contracting Officer's Technical Representative to discuss contract oversight duties and responsibilities.

To determine if the unarmed contract guards were qualified and trained in accordance with the contract, OIG reviewed licensing and training documentation for a random sample of 80 of 307 contract guards stationed in Washington, D.C., as of January 2017.³¹ Based on this sampling method, OIG can project the results to the population. OIG obtained the District of Columbia security guard licenses and training records from the contractor for each guard selected in the sample.

OIG conducted this performance audit in Washington, D.C., from February 2016 through September 2018 in accordance with generally accepted government auditing standards. Those standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for its findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on its audit objective.

³¹ OIG randomly selected a probability sample from the population of contract guards working at the Smithsonian museums in Washington, D.C., as of January 2017. Because OIG followed a probability procedure based on random selections, OIG's sample is only one of a large number of samples that OIG might have drawn. Since each sample could have provided different estimates, OIG expresses its confidence in the precision of its particular sample's results at a 95 percent confidence interval (e.g., plus or minus 5 percentage points). This is the interval that would contain the actual population value for 95 percent of the samples OIG could have drawn. As a result, OIG is 95 percent confident that the confidence intervals in this report will include the true values in the study population. All percentage estimates from the sample of contract guards have a sampling error (confidence interval widths) of plus or minus 5 percentage points or less.

Appendix II

BASIC TRAINING CLASS ANALYSIS

To determine whether new security guards received all their required basic training, the Office of the Inspector General analyzed the attendance records for the Office of Protection Services' five basic training classes conducted from 2014 to 2016. The analysis showed that 88 of the 119 guards (74 percent) did not receive all their basic training classes, and that only 31 of the guards (26 percent) attended all basic training classes.

The results of this analysis for each class is below.

January 2014 – This class was scheduled for 25 days (183 hours). A snowstorm occurred during the training period, resulting in 2 days of government closure and 2 days when training started late due to a 2-hour delay in the government's reopening. Basic training graduation was scheduled on one of the closure days and one of the delayed days. Consequently, guards missed approximately 10 hours of instruction due to weather-related closures. Additionally, three guards missed 1 day of instruction, and one guard missed 3 days of instruction for personal reasons.

March 2015 – This class was scheduled for 20 days (147 hours). A snowstorm occurred during the training period, resulting in a 1-day government closure. Although the government reopened and training resumed the following day, three guards did not attend training that day, citing the weather as the reason for their absence. Additionally, there were 2 days when the training started late due to a 2-hour delay in government opening because of the weather. Guards missed a total of 11 hours of instruction due to weather-related closures. Three guards missed 1 day of instruction, and one guard missed 2 days of instruction for personal reasons.

January 2016 – This class was scheduled for 18 days (133 hours). A snowstorm occurred during the training period, resulting in 2 days of closure, 1 day with early dismissal, and 2 days with 3-hour delays in government opening. Guards missed a total of 23 hours of instruction due to weather-related closures. Although one guard missed 6 days of instruction – 4 days due to leave and 2 days due to weather – this was the most any one guard missed, and the guard still graduated with the rest of the class. Additionally, one guard missed 1 day of instruction for personal reasons.

June 2016 – This class was scheduled for 16 days (120 hours). Three guards missed 1 day of training each because they were attending the Smithsonian's New Employee Orientation. One guard missed 3 days, and another guard missed 1 day of training due to personal reasons.

October 2016 - This class was scheduled for 16 days (120 hours). Thirteen of the 34 guards missed the first day of instruction, 11 because they attended the Smithsonian's New Employee Orientation, two for personal reasons. Additionally, one guard missed 2 days of instruction, and two guards missed 1 day of instruction, all for personal reasons.

MANAGEMENT RESPONSE



Smithsonian Institution

July 27, 2018

To: Cathy Helms, Inspector General

From: Jeanne O'Toole, Director Office of Protection Services

Cc: Albert Horvath, Michael McCarthy, Greg Bettwy, Judith Leonard, Porter Wilkinson, Brian Lowe, Teena Probst, Joan Mockeridge, Douglas Hall, Dee Walker, Hugh Meehan

Subject: Management Response to Office of Inspector General Formal Draft

Physical Security: The Office of Protection Services Needs to Strengthen Training, Medical and Physical Standards, and Equipment Requirements for Armed Security Guards and Improve Oversight of Unarmed Contract Guards

This response is submitted on behalf of the Office of Protection Services (OPS), and OPS appreciates the opportunity to provide additional context. Our security and law enforcement staff are the single most important measure we have for protecting the Smithsonian's staff, visitors, and collections. As such, we strive to develop and improve our workforce and welcome constructive feedback and recommendations for enhancing OPS capabilities and readiness. OPS has studied closely the previous attacks and active shooter incidents mentioned in the OIG report and continue to learn from the lessons of other cultural institutions. We are committed to continuing to make the training and readiness of our security and law enforcement staff a priority.

Cultivating the OPS workforce is identified as the primary goal in our first ever Strategic Plan: Develop "One OPS" dedicated to inclusive excellence and prepared to address the complexity of the evolving security challenges across the Smithsonian. We support the recommendations of this audit to include our comments and the important clarifying context, as provided below. OPS has extensively benchmarked our office with multiple law enforcement and security agencies, cultural property institutions and associations, and we have considered various Federal criteria such as that provided by the Department of Homeland Security's Interagency Security Criteria (ISC). The ISC was created in an Executive Order to address security for U.S. facilities occupied by federal employees for non-military activities. The benchmarked data has served as the foundation for many OPS initiatives, to include, staffing analyses, design and construction, the structure and content of our current training programs and a (draft) Career Development guide.

The ISC standards do not neatly align with the public access, admission-free museum model, which is a unique and extraordinary experience for our millions of visitors, worldwide. In benchmarking with other cultural institutions, OPS has noted that the ISC standards can vary, rather dramatically, from common security practices widely accepted for museums and other cultural properties. The OPS Strategic Plan recognizes that 'one size does not fit all' when it comes to risk mitigation. Accordingly, OPS generates a customized Security Management Review (SMR) to identify risks and determine appropriate mitigation measures at all

Smithsonian facilities. The SMR process aligns with the Smithsonian's Strategic Plan, Goal 7, c., "We will integrate risk management and mitigation into all our operations and decision making." OPS suggests that, by relying solely on ISC criteria, which are more narrowly focused, the OIG missed an opportunity to provide a more holistic review of OPS capabilities and limitations. The more inclusive and wide-ranging benchmarking that OPS has performed has assisted in creating a comprehensive OPS officer training curriculum suited to appropriately protect the uniqueness and complexity of the Smithsonian Institution.

Response to Recommendations:

To ensure that Smithsonian has well qualified armed security force, OIG recommends that the Director of OPS:

1. Develop a standard curriculum for the basic training program to establish a minimum number of required classroom and hands-on training hours for the eight major subject areas that correspond to critical tasks for armed security guards.
2. Develop and implement procedures to ensure that guards receive all required instruction before they graduate from the basic training program.

OPS Response: Concur, with specific exceptions. In their findings for the categories and hours of training, the OIG primarily referenced the ISC (or select recommendations from an OPS benchmarking training study that support ISC recommendations). We note that the ISC does not specify that all training should come at entry level. OPS performs training at entry, on the job (OJT), and annual refresher after the first year. For the reasons mentioned earlier, and the fact that OPS provides training year round, OPS cannot commit to categories and training hours based solely on the recommendations of the ISC.

The OIG correctly identified that every officer did not receive every entry level training class before being armed and commissioned as an officer. However, the OIG has apparently assumed that all training classes are equally important, which is not correct, in theory or in practice. Therefore, we disagree with the conclusion:

"OPS cannot ensure that armed guards have all the knowledge and skills needed to fully protect visitors and staff in Washington, D.C., facilities."

It is not reasonable, nor is it cost-beneficial for officers to take all training classes prior to being armed and commissioned. A minimum standard that is consistently met, and then augmented with a series of OJT and continuing training classes (to be completed within the first year) provides a more efficient training model. This training model may not completely align with the ISC criteria, but it will incorporate those elements, as appropriate, along with recommendations from other benchmarking sources and analyses that include cultural property protection. The program structure will also be adaptable over time, as industry best practices continue to evolve. OPS is also working to develop a standard method of documenting programmatic changes and their justification.

OPS agrees that there is a need to clearly identify and track the requirements of our training program and we are actively auditing our training program training requirements for entry level and OJT training. We are working to identify the minimum class requirements and hours for an officer to become armed and commissioned. OPS is currently working with the Smithsonian Human Resources Management System to develop "learning paths" for all required training, so we can track all entry level, OJT, and refresher training throughout an officer's career. This approach leads to a multi-year training plan that recognizes the diversity of applicant experience and the OJT training given in their first year.

Estimated date to complete: 10/01/19.

3. Assess the costs and benefits of adopting ISC's best practice to require semiannual firearms qualifications for all armed security guards.

OPS Response: Concur, with comment. This assessment will require a significant analysis of the entire array of resources required to implement an additional firearms qualification. A semi-annual firearm qualification will increase OPS FTE (officers and training instructors), ammunition purchases, and firing range time (to include procuring additional firing ranges), and may require an increase in the use of non-reimbursable overtime to address the staffing demands created by the new requirement. OPS does conduct firearms simulator training in addition to the current firearms qualification.

Estimated date to complete: 07/01/19.

To ensure that armed security guards are medically and physically fit for duty, OIG recommends that the Director of OPS:

4. Establish interim milestones for completing the remaining tasks to develop medical and physical standards and a target completion date for implementing these standards.

OPS Response: Concur.

Estimated date to complete: 1/01/19.

To ensure that armed security guards at Smithsonian's facilities are properly equipped to respond to emergencies, OIG recommends that the Director of OPS:

5. Clarify its policy to specify the required amount of ammunition for armed security guards carrying revolvers.

OPS Response: Concur with comment. OPS currently issues the exact amount of ammunition recommended by the ISC, however, it is not stated clearly in our internal policy. We will update our policy.

Estimated date to complete: 1/01/19.

To ensure that OPS has a well-qualified unarmed guard force, OIG recommends that the Director of OPS direct the COTR to:

6. Develop and implement procedures to periodically verify that the unarmed guards meet the contract qualification and training requirements.
7. Establish and implement a process to identify the unarmed guards who conduct visitor screening and periodically verify that they have met the training requirements.

OPS Response: Concur with comment. OPS has just awarded a new security guard contract. Part of our discussion for the upcoming kick-off meeting will be to itemize contract security guard training requirements.

Estimated date to complete: 1/01/19.