Report to the Ranking Member, Committee on Homeland Security, House of Representatives

June 2011

FEDERAL FACILITY SECURITY

Staffing Approaches Used by Selected Agencies
Federal Facility Security: Staffing Approaches Used by Selected Agencies
FEDERAL FACILITY SECURITY

Staffing Approaches Used by Selected Agencies

Why GAO Did This Study

The Federal Protective Service (FPS) within the Department of Homeland Security (DHS) provides security and law enforcement services to over 9,000 federal facilities through its federal and contract security workforce. Over the years, GAO has made numerous recommendations to address significant weaknesses in FPS’s oversight and management of its security workforce. Legislation has been introduced that would, among other things, have FPS examine the effectiveness of relying more on federal employees for security.

As requested, this report examines: (1) nine federal agencies’ approaches for staffing their security workforces; (2) federal and private sector representatives’ views on the benefits and challenges of using contract and in-house security staff; and (3) lessons that FPS can learn from agencies that have changed their security staffing approaches. GAO reviewed agency documents and conducted interviews with representatives from federal agencies and private sector firms selected based on the use of security guards and experience in changing a security workforce, among other criteria. The selected agencies and private sector firms are a nonprobability sample, and the information we obtained is not generalizable.

GAO provided the nine agencies with a draft of this report for comment. In response, agencies provided technical comments that were incorporated where appropriate.

What GAO Found

Eight of the nine selected federal agencies reported using a combination of contract and in-house facility security positions, and the distribution of their security staff varies significantly (see figure below). Contract security staff are primarily used for routine access control functions, while in-house staff, such as federal security guards and inspectors, tend to perform a variety of security functions, such as patrol and risk assessment. Selected agency officials cited facility risk level and cost, among others, as factors considered when staffing a security workforce. Federal agencies used various types of security staff—even at high-risk facilities—for protection. As a high-profile law enforcement agency, the Department of Justice uses armed contract security guards with prior law enforcement experience to protect its high-risk facilities.

| Selected Agencies’ Distribution of In-House and Contract Security Workforce |
|-----------------------------|-----------------------------|-----------------------------|-----------------------------|
| Veterans Health Administration | Pentagon Force Protection Agency | U.S. Marshals Service |
| Transportation Security Administration | Air Force | Justice Protective Service |
| Smithsonian Institution | Army | Federal Protective Service |

In-house security workforce

Contract security workforce

Source: GAO analysis of agency data.

Note: To determine an agency’s in-house to contract security workforce ratio for Fiscal Year 2010, GAO used 1,760 work hours per year to convert contract service hours into one full-time equivalent.

*The Pentagon Force Protection Agency did not provide in-house and contract workforce data, but provided estimates of the number of in-house and contract security staff for Fiscal Year 2010.

Federal and private sector representatives reported that contract and in-house security staff offer benefits and challenges for agencies to weigh when making staffing decisions. The two primary reported benefits of contract security staff were (1) potential cost savings and (2) flexibility to increase or reduce staff size. Conversely, these two issues were commonly cited as challenges in using in-house security staff. The reported benefits for in-house security staff were greater control to select qualified security staff and develop them to meet organizational needs.

Early planning to determine security staffing needs and sufficient oversight were cited as key lessons learned when changing staffing approaches. For example, Smithsonian Institution had time to conduct risk-based assessments, which helped it decide to use contract staff only at lower-risk posts. Other agencies’ experiences, as well as FPS’s experience in transitioning to an inspector-based workforce, suggest that changing FPS’s staffing approach could prove challenging. Early planning could help FPS address some of those challenges in the event a transition is desired or mandated, and sufficient oversight and management of its workforce will be critical to providing effective security.
Letter

Background

Most Selected Federal Agencies Use a Combination of In-house and Contract Security Positions to Meet Their Individual Facility Security Requirements

Cited Benefits of Contract Security Staff Are Potential Cost Savings and Personnel Flexibility, While In-house Security Staff Are Viewed as Offering Increased Control over Staff Selection and Development

Need for Upfront Planning in Determining Security and Staffing Needs and Better Oversight of Workforce Were Key Lessons Learned When Changing Staffing Approach

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Abbreviations

BLS  Bureau of Labor Statistics
CPDF  Central Personnel Data File
DHS  Department of Homeland Security
DOD  Department of Defense
DOJ  Department of Justice
DOT  Department of Transportation
FERS  Federal Employees Retirement System
FLETC  Federal Law Enforcement Training Center
FPS  Federal Protective Service
FTE  full-time equivalent
GS  general schedule
GSA  General Services Administration
ISC  Interagency Security Committee
JPS  Justice Protective Service
LESO  law enforcement security officer
OMB  Office of Management and Budget
OPM  Office of Personnel Management
PFPA  Pentagon Force Protection Agency
RAMP  Risk Assessment Management Program
Smithsonian  Smithsonian Institution
TSA  Transportation Security Administration
USMS  U.S. Marshals Service
VA  Veterans Affairs
VHA  Veterans Health Administration

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June 30, 2011

The Honorable Bennie G. Thompson
Ranking Member
Committee on Homeland Security
House of Representatives

Dear Mr. Thompson:

Protecting federal facilities and their occupants from terrorist attacks and other violent acts remains a daunting challenge for federal agencies. Agencies face potential workplace violence, unauthorized access, and terrorism, among other facility security threats, and employ security personnel who perform a key role in helping to protect against such threats. Responsibilities for federal facility security are dispersed among multiple federal agencies. Several agencies, including the Departments of Defense (DOD), Justice (DOJ), and Veterans Affairs (VA), are responsible for securing some of their own facilities. However, the Department of Homeland Security’s (DHS) Federal Protective Service (FPS) is the primary federal agency that is responsible for securing and protecting approximately 9,000 federal facilities nationwide that are under the control and custody of the General Services Administration (GSA). Through its federal and contract security workforce, FPS provides facility security services that include law enforcement, security, and emergency response. In recent years, our work has identified significant weaknesses in FPS’s oversight and management of its security workforce, including the failures to ensure that its contract security guards maintain required training and certifications and to annually evaluate security guard performance. Such oversight gaps have raised questions about FPS’s reliance on a contract workforce.

Congress has begun to explore alternative approaches for staffing FPS’s facility security workforce. Legislation has been introduced that would,

among other things, reclassify and change the job functions of FPS’s federal security employees and require FPS to examine the effectiveness of using federal employees to staff the contract security guard positions at the highest-risk federal facilities. In light of your interest in staffing approaches for facility security workforces, this report examines: (1) selected federal agencies’ approaches in staffing their facility security workforces; (2) federal agency and private sector representatives’ views on the benefits and challenges of using contract or in-house security staffing approaches; and (3) lessons that FPS can learn from other federal agencies that have changed their security staffing approaches.

To gather information addressing all of these issues, we reviewed agency documents and conducted interviews with the following nine federal agencies:

- FPS;
- Transportation Security Administration (TSA);
- U.S. Army;
- Pentagon Force Protection Agency (PFPA);
- U.S. Air Force;
- U.S. Marshals Service (USMS);
- DOJ’s Justice Protective Service (JPS);
- Smithsonian Institution (Smithsonian); and
- Veterans Health Administration (VHA).

We selected these agencies based on several criteria, including dispersed geographic location of facilities, facility security staff presence, a need to balance public access and security at facilities, and experience in changing the approach used to staff their facility security workforce, among other factors. We reviewed selected federal agencies’ documents and data on the
facility security workforce staffing approaches used, including the salary costs for federal facility security employees and the responsibilities performed by those employees and contract security personnel. To ensure the accuracy of the staffing data collected, we provided each federal agency with data on the number of full-time equivalent (FTE) employees for security-related positions in the Office of Personnel Management’s (OPM) Central Personnel Data File (CPDF) for that agency. We asked each agency to review its CPDF data and provide updated figures for fiscal year 2010 for the information requested. We assessed the CPDF data and found it to be sufficiently reliable for our purposes. We also gathered views and information on the benefits and challenges for facility security staffing approaches, including the use of contract or in-house security staff, from representatives of the nine selected federal agencies and three private sector industries: (1) commercial real estate; (2) entertainment, including gaming and theme parks; and (3) hospitals. The industries were selected using the previously stated criteria for selecting federal agencies. We selected a total of 10 companies and associations within these industries for interviews. Because the selected organizations are a nonprobability sample, the information we obtained are not generalizable. To determine lessons that FPS can learn from other federal agencies that have changed their security staffing approaches, we reviewed agency documents and conducted semistructured interviews with officials from the four selected agencies that had undergone a workforce transition (Air Force, Army, Smithsonian, and TSA). In addition, we reviewed our previous reports and industry literature regarding staffing a security workforce. See appendix I for more detailed information on our scope and methodology.

We conducted this performance audit from July 2010 through June 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The general purpose of facility security is to protect people, property, and the facility itself by deterring, detecting, and responding to potentially criminal and dangerous acts and people. Threats to facility security may include theft, unauthorized access, natural disasters, and terrorism, among others. An organization’s need to balance security with open and public access can make facility security more challenging, including at facilities such as medical centers, commercial office buildings, and gaming
facilities. Organizations’ efforts to provide facility security are more extensive than simply assigning an individual to “stand guard.” Key functions of facility security generally include facility access, patrol and law enforcement, and security management (see table 1).

<table>
<thead>
<tr>
<th>Primary facility security functions</th>
<th>Job tasks</th>
<th>Description of job tasks</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility access</td>
<td>Security access control</td>
<td>Control access to the facility; stand post at entry/exit points</td>
</tr>
<tr>
<td></td>
<td>Visitor processing</td>
<td>Check visitor identification; issue visitor identification badges</td>
</tr>
<tr>
<td></td>
<td>Screening functions</td>
<td>Operate security equipment, such as x-ray machines and magnetometers, to screen for prohibited materials</td>
</tr>
<tr>
<td></td>
<td>Control center operations</td>
<td>Monitor security cameras and/or alarms</td>
</tr>
<tr>
<td>Patrol and law enforcement</td>
<td>Proactive patrol and response</td>
<td>Observe environment for suspicious activity and conduct patrols in accordance with scheduled routes; inspect facilities for hazards and unsafe conditions and respond to reports of incidents; and request emergency assistance if needed</td>
</tr>
<tr>
<td></td>
<td>Incident investigations</td>
<td>Investigate reports of crime and incidents</td>
</tr>
<tr>
<td></td>
<td>Custodial authority</td>
<td>Detain or arrest offenders</td>
</tr>
<tr>
<td>Inspections</td>
<td>Inspect posts</td>
<td>Conduct inspections of facility security posts to ensure compliance with requirements</td>
</tr>
<tr>
<td>Risk assessment</td>
<td>Facility security risk assessments</td>
<td>Identify security risks and needs of individual facilities and recommend security measures to mitigate risk to facilities</td>
</tr>
</tbody>
</table>

Source: GAO analysis of FPS and OPM data.

As part of facility security management, organizations conduct risk assessments—or facility security assessments—that include identifying threats, vulnerabilities, and consequences to determine overall risk and what means, or countermeasures, are best suited to secure the facility. Organizations use a variety of countermeasures to provide facility security, including the use of security equipment, building-design specifications, and security personnel. Nonmilitary federal facilities are categorized into five facility security risk levels that are based on five factors: mission criticality, symbolism, facility population, facility size, and threat to tenant
Private companies make individual determinations on how they want to mitigate facility security risks and must ensure their security workforces meet the specific needs of their industry. For example, security guards in the hospital industry protect employees, patients, visitors, and hospital equipment, and also may provide specialized assistance to ensure the safety of people with particular medical needs.

To carry out facility security functions, organizations may rely on in-house security personnel; for federal agencies, those personnel are classified into several specific general schedule (GS) job series. Federal guidance provides broad parameters for the duties associated with each job position within its assigned OPM job series, but each agency is able to further refine its specific position descriptions within those parameters. The following provides the five job series used for the security personnel at the agencies we reviewed and a summary of the key security duties associated with each job series according to OPM guidance:

- **GS-0085 Security Guard**—generally performs protective services work involving guarding, protecting, and controlling access to federal facilities;
- **GS-0083 Police**—generally performs law enforcement work involving protecting the peace, investigating crimes, and arresting violators;
- **GS-0080 Security Administration**—generally performs or manages facility security work involving developing risk assessments, implementing security procedures, and overseeing security staff;
- **GS-1811 Criminal Investigation**—generally performs or supervises work involving planning and conducting investigations related to violations of federal laws; and
- **GS-1802 Compliance Inspection**—generally performs work involving conducting inspections to ensure compliance with federal laws (e.g., inspection of airline passengers and baggage).

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3The five factors were defined by the Interagency Security Committee (ISC), which develops standards designed for federal security officials responsible for protecting all nonmilitary facilities occupied by federal employees. The Facility Security Level Determinations Standard has five security risk levels determined by a point-scoring matrix. A level I facility is considered the lowest risk and has the fewest total points; a level IV facility has the highest total points. Level V facilities may be designated by individual agencies for "very high" score value for criticality or symbolism, or is a one-of-a-kind facility, such as the White House.
In addition to in-house facility security personnel, organizations may also use contract security personnel to secure their facilities. Organizations generally contract for a certain number of hours of security service to be fulfilled by contracting companies, rather than specifying the number of contract security personnel. Contracting companies recruit, hire, train, and pay their own security staff and typically charge an organization an hourly rate for their services. Titles for these contract security personnel may vary by organization. For example, FPS calls them protective security officers, while the Army more simply calls them contract security guards.

In the federal government, DHS is designated under the Homeland Security Act of 2002 as the primary agency authorized to enforce federal laws and regulations aimed at protecting federal facilities and persons on the property. Within DHS, FPS is the security provider for GSA-owned or controlled facilities. FPS’s federal workforce consists of about 675 law enforcement security officers (LESO), also known as inspectors, who are responsible for law enforcement and security duties, including: patrolling building perimeters, responding to incidents, completing risk assessments for buildings, recommending security countermeasures, and overseeing the contract security workforce. FPS also relies on about 14,000 contract security guards to control access, operate security equipment, observe the environment for suspicious activity, and respond to emergency situations involving the safety and security of the facility. We previously identified several vulnerabilities and weaknesses in the oversight of both FPS’s federal and contract workforces, and FPS is currently undertaking efforts to address these weaknesses and improve management of its security workforce. In addition to FPS, other federal agencies are responsible for

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4Federal agencies’ use of contract personnel is usually subject to the Office of Management and Budget (OMB) Circular A-76, which dictates the federal policy for the competition of commercial activities.

5Security officials told us they prefer using the title of security officer, instead of security guard, in order to reflect the array of security services that may be provided by the security officer. In this report, however, we refer to these positions as security guards.

6For the purposes of this report, we refer to property that is owned by the federal government and under the control and custody of the GSA Administrator as “GSA-owned property”.

securing and protecting their own facilities. Table 2 shows the facilities protected by the other agencies included in our review.

<table>
<thead>
<tr>
<th>Selected federal agency</th>
<th>Federal facilities secured</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal Protective Service</td>
<td>9,000 GSA owned/managed facilities nationwide&lt;sup&gt;a&lt;/sup&gt;</td>
</tr>
<tr>
<td>U.S. Air Force</td>
<td>76 installations nationwide</td>
</tr>
<tr>
<td>U.S. Army</td>
<td>82 installations nationwide</td>
</tr>
<tr>
<td>JPS</td>
<td>DOJ headquarters and 22 DOJ facilities in the National Capital region</td>
</tr>
<tr>
<td>USMS</td>
<td>400 federal court facilities nationwide&lt;sup&gt;b&lt;/sup&gt;</td>
</tr>
<tr>
<td>PFPA</td>
<td>Pentagon and 27 DOD facilities in the National Capital region</td>
</tr>
<tr>
<td>Smithsonian</td>
<td>19 museum facilities in Washington D.C., and New York, N.Y., and 9 research facilities in the Washington, D.C., metro area, New York, N.Y., and Panama</td>
</tr>
<tr>
<td>TSA</td>
<td>Security screening at 400+ airport facilities nationwide&lt;sup&gt;c&lt;/sup&gt;</td>
</tr>
<tr>
<td>VHA</td>
<td>152 hospitals Nationwide</td>
</tr>
</tbody>
</table>

Source: GAO presentation of federal agency data.

<sup>a</sup>FPS provides security personnel to about 2,360 of these facilities. Based on facility risk assessments, FPS did not recommend using contract security personnel as a countermeasure at the remaining 6,600 facilities under its protection. Other security countermeasures, such as cameras and perimeter lighting, may have been recommended to mitigate risk at these facilities.

<sup>b</sup>FPS shares responsibility with USMS for securing federal court facilities. Federal courts operate most often in multitenant buildings that also house other federal agencies. In these multitenant buildings, USMS is responsible for securing court space, while FPS is generally responsible for securing the perimeter of the building and other offices that are not occupied by the federal courts.

<sup>c</sup>TSA is responsible for protecting the nation’s transportation system, which includes protecting and screening passengers and baggage at airport facilities nationwide.
Most Selected Federal Agencies Use a Combination of In-house and Contract Security Positions to Meet Their Individual Facility Security Requirements

Selected Federal Agencies Generally Use In-house Staff to Perform a Wide Range of Security Functions, While Contract Security Guards Typically Perform Routine Access Control

Eight of the nine federal agencies selected for our review currently use a combination of both in-house and contract security personnel to secure their facilities, and the distribution of in-house and contract staff vary significantly (see fig. 1). VHA almost exclusively uses federal employees to secure its hospitals. Three of the selected agencies have statutory requirements that determine their use of federal and contract staff: the Army, Air Force, and TSA. DOD is generally prohibited from entering into a contract for the performance of firefighting or security guard functions at any military installation or facility. However, Congress authorized DOD to temporarily use contract security staff in fiscal year 2003 to address increased security needs at its facilities when numerous DOD employees were deployed overseas, but DOD is now required to discontinue the temporary use of contract security guards at the end of fiscal year 2012.

There are other federal agencies that were not included in this review, such as the Capitol Police, that also exclusively use federal security personnel to provide facility security. In addition, while VHA typically does not use contract security personnel agency-wide, officials estimated that 2 to 3 percent of individual VHA facilities may decide on their own to hire contract security personnel for limited functions.

Under 10 U.S.C. § 2465, DOD is generally prohibited from entering into a contract for the performance of firefighting or security guard functions at any military installation or facility. However, in the aftermath of September 11, 2001, attacks, DOD sent numerous active duty, U.S.-based personnel overseas to support the global war on terror. These deployments depleted the pool of military security guards at a time when DOD was faced with increased security functions at its domestic military installations. To ease the imbalance, DOD was allowed by Congress in 2002 to contract with state and local governments and contract security guards for the performance of security functions at domestic military installations. In 2008, Congress extended the temporary authorization to 2012, but DOD is required to discontinue using these contract staff by the end of that fiscal year. Additionally, although other DOD entities, such as the U.S. Navy and U.S. Marine Corps, are also subject to the statute, we did not include them in our review.
TSA’s composition of mostly federal security employees, or airport passenger screeners, was dictated when the agency was created in the Aviation and Transportation Security Act of 2001.\textsuperscript{10} Others among our selected agencies generally have the discretion to determine the extent to which they use in-house staff or contract the facility security functions out to private contractors. For instance, PFPA primarily uses federal police officers to secure the Pentagon—a facility with a high risk for terrorist attack—and contract security guards to secure its lower-risk facilities.\textsuperscript{11}

\textbf{Figure 1: Distribution of Selected Agencies’ In-house and Contract Security Workforces in Fiscal Year 2010}

Note: To determine the ratio of the number of in-house and contract staff in fiscal year 2010, we used 1,760 work hours per year to convert contract service hours into a FTE number of employees for contract staff. The 1,760 work hours account for a typical federal employee and includes estimated time for annual and sick leave that may be used in a year. The number of in-house staff for the Air Force, Army, and PFPA does not include military personnel who perform security functions.

\textsuperscript{a}PFPA did not provide us with in-house and contract workforce data, but provided estimates of the number of in-house and contract security staff for fiscal year 2010.

Federal agencies reported using a variety of in-house security positions (see table 3); however, one or two key positions may account for the majority of the agency’s in-house security staff. For example, while the Smithsonian reported that it uses four different types of federal security positions, almost 90 percent of its security employees are federal security guards.

\textsuperscript{10}In the case of TSA, Congress required hiring federal security employees to replace a contract security workforce that had been procured independently by the airlines, in an effort to improve aviation security. A provision under the Aviation and Transportation Security Act of 2001 also allowed some airports to opt out of using federal security employees and use a contract security workforce for screening passengers at its airports.

\textsuperscript{11}PFPA is not subject to 10 U.S.C. § 2465, but under 10 U.S.C. § 2674, the Secretary of Defense may appoint federal government or contract personnel to perform law enforcement and security functions for property occupied by, or under the jurisdiction, custody, and control of DOD, and located in the National Capital region.
Table 3: Selected Federal Agencies’ In-house and Contract Facility Security Positions

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<thead>
<tr>
<th></th>
<th>In-house</th>
<th>Contract</th>
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<tbody>
<tr>
<td></td>
<td>GS-0085</td>
<td>GS-0080</td>
</tr>
<tr>
<td></td>
<td>Security</td>
<td>Security</td>
</tr>
<tr>
<td></td>
<td>Guard</td>
<td>Administration</td>
</tr>
<tr>
<td>Army</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>USAF</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>PFPA</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>JPS</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>FPS</td>
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<tr>
<td>USMS</td>
<td>●</td>
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<tr>
<td>TSA</td>
<td>●</td>
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<tr>
<td>VHA</td>
<td>●</td>
<td>●</td>
</tr>
<tr>
<td>SI</td>
<td>●</td>
<td>●</td>
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</tbody>
</table>

Source: GAO analysis of data submitted by federal agencies.

*According to the September 2010 OPM CPDF.

Agency officials reported that their in-house security staffs collectively perform a broader range of facility security functions than their contract staff. In-house security administration staff, police officers, and security guards, among others, perform a wide range of security functions. The most common security functions that in-house staff performed are law enforcement, post inspections, and risk assessments (see fig. 2). In contrast, seven of the eight agencies currently using contract security personnel reported their contract staff generally perform routine facility access control functions, including visitor screening and control center operations. FPS reported that its contract security guards performed a wider range of tasks, including some patrol and response duties. Officials from other agencies reported using contract security guards for what they consider to be lower-risk security posts, such as those providing visitor assistance. According to Air Force officials, their decisions of where to use contract staff are not predicated on facility or post risk levels, but on where staff are needed to replace deployed military personnel.
Depending on the functions that are performed, each security position, whether in-house or contracted, generally has different training requirements that are specified by each individual agency’s needs. Training for federal and military police officers is generally more extensive than that required for federal and military security guards—two commonly used in-house security positions. While federal police officers receive training at a police academy, a federal law enforcement training facility, or a DOD-agency training facility, training for federal security guards is currently dictated by each agency’s individual needs. For example, Air Force officials told us that Air Force police officers receive 5 weeks of training and can perform all the job functions of security guards, in addition to broader law enforcement functions, while Air Force security guards receive 2 weeks of training to perform a more limited set of functions focused on facility access. Currently, no federal governmentwide training standards exist for contract security guards to work in federal facilities. Consequently, training requirements for contract security staff vary depending on the agency, as well as possible

12Federal police officers may also receive additional training in accordance with agency-specific requirements.

13Although the Air Force currently uses security guards, officials told us they plan to convert security guards to police officers and discontinue security guard training.

14ISC has efforts under way to establish minimum standards for armed contract security guards in federal facilities.
Agencies specify in their contract statements of work the functions that contract staff are expected to perform, as well as the qualifications that are required for the staff. For instance, in addition to basic security training provided by the contractor, FPS contract security guards are required to have 16 hours of FPS-provided training, including certification on X-ray and magnetometer equipment, while the Air Force’s contract security guards receive 40 hours of government-provided training specific to the installation in which they are assigned.

Selected agency officials told us that their decisions about staffing facility security functions—whether it be deciding between using in-house or contract staff or deciding the most appropriate type of in-house staff—are driven by multiple factors, such as their individual facility security requirements and costs. Federal facilities nationwide differ in their facility type, size, location, occupant mission, and risk level, among other factors. As we have previously reported, and security officials corroborated, there is no widely accepted formula to determine the size and makeup of a security workforce and no standard model can be applied for staffing because the risk level and specific building needs may differ. While some federal agencies may use in-house staff to secure their high-risk facilities, other agencies, such as JPS or USMS, may use contract security guards to protect their high-risk facilities. Over the years, we have advocated the use of a comprehensive risk management approach that links threats and vulnerabilities to resource requirements and allocations to address potential security threats.

According to security officials from selected agencies, staffing for specific security positions is based on factors such as the risk level and specific needs of the facilities that are being protected. Staffing needs dictate the qualifications that agencies set for either their in-house or contract staff. For instance, FPS requires a high-school diploma, among other things, for its contract security guards; however, it does not require a law enforcement background or previous law enforcement experience. In contrast, PFPA requires some of its contract security guards to have, among other things, a secret-level security clearance, because of their

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15Some states have licensing requirements to become a security guard and, as such, those states require basic security training for licensed security guards.

potential access to sensitive materials. Examples of factors considered by agency security officials in reaching their security staffing decisions include the following:

- Smithsonian reported primarily using federal security guards to control access, operate security equipment, and patrol the perimeter of its facilities where the security risks are higher. Contract security guards are used to assist and advise visitors within the interior of museums, where security risks are lower because visitors are screened when granted access to the building.

- JPS security officials stated that the high-profile nature of the law enforcement and justice mission of DOJ draws increased attention to its facilities and poses increased or additional security threats, such as protests and other potential harm. It uses armed contract security guards, all of whom have prior law enforcement experience and are highly trained and deputized as Special Deputy U.S. Marshals.

- VHA facilities face security risks due to their open campuses at diverse locations. VA officials explained they rely on locally conducted risk assessments to determine their facilities’ security response. At some of its medical facilities located in rural locations, ready access to local law enforcement services may be limited; at several of its large urban VHA facilities, local law enforcement agencies generally do not provide basic police services on federal facilities. As a result, VA primarily uses uniformed federal police officers to provide facility security and law enforcement functions.

Security officials also cited cost as another factor that was considered in staffing their workforces. We previously found that security officials from federal agencies cited budget considerations in making law enforcement and facility security staffing decisions. The base salary costs of government security positions vary depending on the experience and qualifications of the individual employee. Among our selected federal agencies, in-house security positions vary in base pay from an average of about $37,000 for security guards to nearly $90,000 for criminal

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17At about 400 federal facilities nationwide, the federal government has exclusive jurisdiction of its facilities, whereby the federal government has all of the legislative authority within the land area in question and the local police have no residual police powers.

18GAO-10-802R.
investigators (see table 4). We found that an agency may hire entry-level employees into a GS-3 or GS-4 position, while experienced employees ranged up to the GS-15 grade level, particularly for security positions requiring higher levels of responsibilities or qualifications. With respect to contract security staff, the specific functions to be performed and the hourly rate associated with each position are established within a contract statement of work. One federal official told us that using a combined federal and contract workforce distributed based on functional areas and risks could make sense from a cost perspective. For example, a cost-effective model may be to have a high-level federal security or law enforcement officer present at facilities to oversee contract security guards assigned to perform certain limited facility access control functions.

Table 4: Security Job Series by Most Common GS Grade Levels and Average Base Salaries of Selected Federal Agencies

<table>
<thead>
<tr>
<th>OPM job series</th>
<th>Top three most common GS grades</th>
<th>Percentage of job-series employees</th>
<th>Overall average base salary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security Guard (GS-0085)</td>
<td>GS-5</td>
<td>49%</td>
<td>$36,822</td>
</tr>
<tr>
<td></td>
<td>GS-4</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GS-6</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Police (GS-0083)</td>
<td>GS-6</td>
<td>55</td>
<td>48,737</td>
</tr>
<tr>
<td></td>
<td>GS-7</td>
<td>20</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GS-8</td>
<td>9</td>
<td></td>
</tr>
<tr>
<td>Security Administration (GS-0080)</td>
<td>GS-12</td>
<td>31</td>
<td>78,378</td>
</tr>
<tr>
<td></td>
<td>GS-11</td>
<td>24</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GS-9</td>
<td>23</td>
<td></td>
</tr>
<tr>
<td>Criminal Investigation (GS-1811)</td>
<td>GS-12</td>
<td>38</td>
<td>89,656</td>
</tr>
<tr>
<td></td>
<td>GS-13</td>
<td>34</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GS-11</td>
<td>14</td>
<td></td>
</tr>
<tr>
<td>Compliance Inspection (GS-1802)</td>
<td>GS-7</td>
<td>55</td>
<td>40,374</td>
</tr>
<tr>
<td></td>
<td>GS-6</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td></td>
<td>GS-8</td>
<td>13</td>
<td></td>
</tr>
</tbody>
</table>

Source: GAO analysis of OPM’s September 2010 CPDF.

Note: Table figures include all federal positions classified in the specified security-related OPM job series, including those positions that may not perform facility security.

19 The General Schedule has 15 grade levels, ranging from GS-1 (lowest) to GS-15 (highest). Agencies classify the grade level of each job based on a determination of difficulty, responsibility, and the qualifications required, among other things.
Cited Benefits of Contract Security Staff Are Potential Cost Savings and Personnel Flexibility, While In-house Security Staff Are Viewed as Offering Increased Control over Staff Selection and Development

Representatives of the nine federal agencies and ten private sector organizations with whom we spoke identified several issues that present either benefits or challenges for using contract and in-house security staff, as identified in table 5. In our analysis of the benefits and challenges identified for both in-house and contract security staff, we found that both workforce staffing approaches offer advantages and disadvantages. As indicated previously, eight of the nine federal agencies in our review use both in-house and contract security staff. If staffing is well managed, agencies may achieve the benefits of either staffing approach.

Table 5: Benefits and Challenges for Using Contract or In-house Facility Security Staff, as Cited by Federal Agency and Private Sector Representatives

<table>
<thead>
<tr>
<th>Benefits</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contract security staff</td>
<td>Cost. Seven representatives cited the potential for cost savings with contract staff, including savings from employee health and retirement benefits</td>
</tr>
<tr>
<td></td>
<td>Personnel flexibility. Ten representatives cited contract personnel flexibility benefits, such as the ability to quickly increase or decrease staff hours as needed</td>
</tr>
<tr>
<td>In-house security staff</td>
<td>Staff selection. Seven representatives cited in-house staff selection benefits, such as increased control over hiring and background checks</td>
</tr>
<tr>
<td></td>
<td>Staff development and retention. Nine representatives cited in-house staff development and retention benefits, such as increased control over training to develop specific skills and increased workforce loyalty</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Benefits</th>
<th>Challenges</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Staff selection. Five representatives cited contract staff selection challenges, including ensuring the quality of contract staff and that desired certifications are in place</td>
</tr>
<tr>
<td></td>
<td>Staff development and retention. Eight representatives cited staff development and retention challenges, such as maintaining a consistent workforce that is familiar with facility and client culture</td>
</tr>
<tr>
<td></td>
<td>Personnel responsibilities. Nine representatives cited increased personnel responsibilities with in-house security staff, including human capital and performance management activities</td>
</tr>
<tr>
<td></td>
<td>Cost. Eight representatives cited the potential for increased costs with in-house staff due to salaries, benefits, overtime, and other costs</td>
</tr>
</tbody>
</table>

Source: GAO analysis of interviews with representatives of federal agencies and private sector organizations.

*Each representative cited was speaking on behalf of one of the organizations we spoke with for the purposes of this report.
Cost. Private sector and federal agency representatives identified potential for cost savings as a benefit of using contract staff over in-house security staff. Such potential cost savings were based on several factors identified by representatives: (1) an in-house staffing model requires organizations to have more employees on board to staff posts than may be required under a contract model in which security is procured hourly; (2) a contract workforce may offer savings in employee compensation costs, including health and retirement benefits; and (3) contract security costs are fixed within the contract, which may reduce the risk of budget fluctuations.

First, contract security staff are typically procured based on the hours of service provided and not by the number of staff who are used by the contractor to provide such services. Several federal officials reported that agencies that use in-house security workforces must have more security staff available than the equivalent hours required to fill the same security posts through a contract workforce to cover time when staff are away from their posts, such as for training or leave. For example, and as discussed later, Smithsonian officials reported it uses contract security guards at lower-risk areas of its facilities which has enabled it to staff five posts with contract security guards for the same cost as three posts staffed with federal security guards. In addition, the use of an in-house security workforce increases the number of FTEs an agency must recruit, train, schedule, and manage, and adds to the in-house administrative responsibilities and associated costs that could otherwise be handled by a contractor. However, Army officials reported that an Army analysis for fiscal year 2009 showed that while contract security guards would have offered savings over in-house security guards in the first 2 years of an in-sourcing decision, in-house security guards would be more cost effective over time as start-up costs for training, equipment, and uniforms are reduced. They noted it had sufficient administrative capacity to absorb the increased workload without additional administrative staff.

Second, federal agency and private sector representatives told us that a contract security workforce offers savings in employee compensation costs, including health and retirement benefits. With a contract security workforce, the contractor is responsible for providing health or retirement benefits to its workforce, rather than the organization procuring the service. Several federal and private sector representatives reported that the benefits offered by contractors may be of lesser value than those offered in the federal sector, where employee benefits represent a significant portion of an employee’s compensation. OPM reported that for fiscal year 2010, the cost factor for federal employee health benefits was about $5,900 per enrolled employee. Retirement benefits for employees
covered under the Federal Employees Retirement System (FERS) are about 14 percent of a regular civilian employee’s salary and as much as 30 percent of a federal law enforcement officer’s salary. An executive from one private sector hospital that had recently transitioned to a contract security workforce estimated that the hospital saved about 36 percent annually by using a contract security workforce rather than an in-house one, with much of this savings coming from no longer having to pay for health, retirement, and other benefits. In addition, several representatives also reported that contract security staff are often paid less than in-house security staff. According to May 2009 data from the Department of Labor, Bureau of Labor Statistics (BLS), the national average annual wage for a contract security guard was $24,450—about 30 percent less than the national average annual wage of $36,410 paid to security guards employed by the federal executive branch in that year. However, federal and private sector representatives also noted that offering lower wages and benefits to security personnel could present challenges in assembling a qualified security workforce, which could present security risks. As such, several representatives noted that, in using a contract security workforce, it is

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20 As we previously reported, generally, the retirement benefits received by federal law enforcement officers are greater than those provided to most other federal employees, albeit for a shorter period of time due to a mandatory retirement age. Under both the Civil Service Retirement System and FERS, the law provides for a faster accruing pension for law enforcement officers than that provided for most other federal employees. For example, under FERS, law enforcement officer benefits accrue at 1.7 percent per year for the first 20 years, compared to 1 percent per year for regular federal employees. Thus, for those under FERS, the total defined benefit is 70 percent higher for law enforcement officers than for other federal employees at 20 years of service. See GAO, Federal Law Enforcement Retirement: Information on Enhanced Retirement Benefits for Law Enforcement Personnel, GAO-09-727 (Washington, D.C.: July 30, 2009).

21 BLS defines contract security guards as those employed by investigation or security service providers. According to BLS data for May 2009, the national average annual wage for all security guards, armed and unarmed, was $26,430. Among the private sector industries in our review, hospital security guards had the highest national average wage ($31,150), followed by those employed within the real estate industry ($29,110), casino hotels ($27,830), and amusement parks ($26,340). Compared with unarmed security guards, armed security guards usually have higher educational and training requirements, as well as higher wages, benefits, and greater job security, according to BLS.
important to establish minimum wage and training requirements within the contract.\textsuperscript{22}

A third benefit of using a contract security workforce is the ability to predict and manage security costs since the costs of the services provided are fixed by the contract. For example, in using an in-house security workforce, increasing security coverage or covering for workforce absences could require the use of overtime hours, which may be costly. Five of the federal agencies in our review reported they budgeted overtime costs for facility security staff for fiscal year 2010, with one agency reporting it budgeted about $1,600 for each facility security staff in that year. Overtime costs for staff absences may not be applicable with a contract security workforce because contractors are responsible for staffing each post under the terms of the contract. An executive from a private sector hospital that uses a contract security workforce reported that the hospital knows its security costs for the life of the contract, including costs defined in the contract for procuring additional security guard hours, if needed.

Given the significant fiscal challenges currently facing the federal government, the reported cost savings offered by a contract security staff may be of particular interest to federal agencies. However, as we have previously reported, in the federal procurement system today, there is common recognition that a cost-only focus does not necessarily deliver the best quality or performance for the government or the taxpayers.\textsuperscript{23} Thus, while cost is always a factor, and often an important one, it is not the only factor that needs to be considered.

\textit{Personnel flexibility.} Representatives also reported personnel flexibility as a benefit of using contract security staff, including the flexibility to adjust and deploy security staff levels to meet immediate needs. According to FPS officials, its security contracts include a requirement that the contractor maintain a reserve force with a recommended capacity of at

\textsuperscript{22}For federal contracts, the U.S. Department of Labor issues wage determinations under the Service Contract Act of 1965, as amended, using available statistical data on prevailing wages and benefits paid in a specific locality. Contractors are responsible for determining the appropriate staffing necessary to perform the contract work, and for complying with the minimum wage and benefits requirements for each classification performing work on the contract. See 41 U.S.C. § 6703 \textit{et. seq.}

least 10 percent to provide additional security guard hours as needed. For example, FPS provides contract security guards to the Federal Emergency Management Agency to support its emergency-response efforts. FPS also provided additional security guard service hours to the Internal Revenue Service in response to an attack on an agency facility in Austin, Texas, in 2010. FPS contractors may employ part-time personnel so they have sufficient numbers to draw upon in the event of a temporary surge in security guard needs, according to FPS officials. In the private sector, executives representing gaming and theme-park industries reported that, while their organizations primarily rely upon an in-house security staff for day-to-day security, both industries call upon contractors to surge their workforce size to address security risks for New Year’s Eve celebrations or other events that attract large crowds, such as concerts.

Using a contract security workforce may also reduce some in-house human capital administrative duties, such as recruiting security staff and addressing performance issues. Several federal agency officials reported that the use of an in-house security workforce presents personnel responsibility challenges, such as increased administrative functions for recruiting and hiring new staff, managing annual or sick leave, planning work shifts, and other duties. We have previously reported that the federal hiring process can be lengthy and complex and is often an impediment to the agencies, managers, and applicants it is designed to serve. This governmentwide hiring challenge also applies to the hiring of in-house security staff. For example, officials with one federal agency reported that its personnel center was taking from 99 to 120 days to recruit and hire new security staff. With a contract workforce, recruitment, hiring, and other administrative responsibilities are the responsibility of the contractor, and the contractor is obligated to provide the hours of service contracted for, regardless of the challenges it might face in doing so. Several federal agency and private sector representatives also reported that contract security staff offer greater flexibility to quickly address poor security guard performance issues than in-house staff. Although representatives we interviewed did not cite specific poor performance issues among in-house staff, several reported that poor performing contract staff can be quickly removed from a client’s site, which is not generally the case for in-house staff. It is generally more complex and time consuming to address poor

performing in-house staff, and the process for federal employees may include performance reviews and appeals.\textsuperscript{25}

While using contract staff can reduce personnel responsibilities in some areas, we have previously reported that it is important for federal agencies to have systems in place to oversee and manage the performance of contract and in-house security staff. In prior work, we have noted that it is critical that agencies implement performance management systems that help their security staff maximize their full potential, while also providing agencies with the necessary information to reward top performers and deal with poor performers, among other things.\textsuperscript{26} We have also noted that it is important to monitor contractor performance to ensure that the terms of the contract are met. Contractor performance evaluations may include daily oversight activities, such as post inspections, or annual reviews to ensure that a contractor is meeting all training, certification, and suitability requirements.\textsuperscript{27} Private sector executives who we interviewed told us that the performance of contract and in-house security guards can be monitored through various means, including customer service surveys, officer performance scenario tests and observations, security guard attendance, and other data. We previously reported that federal agencies can develop effective performance management systems by implementing a set of key practices that apply to agencies’ management of in-house as well as contract security workforces.\textsuperscript{28} Implementing performance management practices requires effort across an organization and is a critical ingredient to ensure the performance of either an in-house or contract workforce model.

\textit{Staff selection.} Representatives from both federal agencies and private sector organizations reported that in-house security staff offer increased control over security staff selection—an important benefit to ensure a qualified security workforce. Representatives from several organizations favored selecting their own staff when they considered the facility or post


\textsuperscript{27}GAO-10-341.

high risk or when the impact from a security breach could pose a high risk of loss to the organization. In using a contract security workforce, individual staff selection decisions are generally made by the contractor and not by the organization in which the staff are placed. Although security staff qualifications may be defined in the contract, several officials reported that reduced control over security staff selection can result in a less-qualified workforce. For example, PFPA officials reported that by using an in-house security workforce, it can control the selection process to ensure the highest caliber officers are hired to protect the Pentagon, a high-risk facility for terrorist attack. In the private sector, executives representing two large gaming corporations reported that their industry primarily uses in-house security staff rather than contract staff to help ensure that large amounts of cash circulating on the gaming floor are secure from theft. Casinos conduct background investigations on all employees, and executives reported that having control of the checks, rather than relying on a contractor to vet officers, ensures their thoroughness before officers are placed in sensitive security positions. Similarly, private sector executives reported concerns with ensuring that thorough security guard background investigations were conducted and state certifications were kept up-to-date by contractors.

**Staff development.** Several private sector and federal agency representatives reported that having in-house security staff allows for greater control over the training and development that security guards receive to tailor staff skills to meet organizational needs. Although specialized training can be costly and time consuming, executives from two private sector firms and a federal agency told us they make training investments for their in-house staff, in part, because they tend to be longer tenured than contract officers. For example, private sector hospital executives reported that most hospitals use in-house security staff who receive training in crisis intervention, infection control, emergency preparedness, and other issues. VHA officials reported that having in-house security staff is preferable to contract staff because it can ensure the workforce receives specific training to meet professional standards. VHA facilities are accredited by the Joint Commission, an organization that accredits health care facilities by maintaining specific standards, such as managing security risks. According to VHA officials, it is easier to maintain the standards with in-house employees rather than relying on contractors whose training requirements are different. According to officials, VHA police officers are considered to be part of the patient-care team, trained to provide security in the VHA psychological and behavioral health centers. VHA officers receive basic training at VHA’s own law enforcement training center, which costs the agency approximately $7,800
per officer; VHA also provides facility-specific training and management-level supervisory courses.

Staff retention. Representatives we interviewed commonly cited staff retention as a benefit of having in-house security staff. In general, federal agency and private sector representatives reported retaining security staff was as an important element in building an experienced workforce that is familiar with the facility and loyal to the organization they are charged to protect. Representatives from several private sector organizations reported that turnover rates—or the percentage of individuals leaving an organization per year—were considered to be higher for contract security guards than those of in-house security staff. Several private sector and federal agency representatives reported that their organization’s in-house security staff turnover rates ranged from 10 to 35 percent; contractor turnover rates were generally considered to be much higher among the officials we interviewed. Two private sector executives further noted that higher security guard turnover can result in an inconsistent security workforce that may not be as familiar with the organization and the facilities they are assigned to protect.

Although private sector representatives generally considered staff retention to be a benefit of in-house staff over contract staff, officials from five of the nine federal agencies we interviewed reported that their agencies had experienced some staff retention challenges. Some federal officials noted that staff retention can be more difficult in certain geographic locations where the federal government and contractors may be competing for qualified staff. Reported challenges included retaining newly hired and trained federal officers who tended to move to higher paying positions within the federal system. VHA and Smithsonian officials indicated that their respective agencies had experienced turnover rates for their in-house security workforces of approximately 10 and 13 percent per year, respectively. Although such turnover rates were lower than the reported turnover rates for contract staff, attrition can be costly because agencies expend upfront costs to recruit, conduct background investigations, and train new staff. Furthermore, federal officials also noted that delays in the federal hiring process can exacerbate staff retention challenges, as attritions may not be quickly replaced by new hires. The Smithsonian, for example, determined that, in many cases, federal security guards hired at the GS-5 level were leaving for other agencies that hired their security guards at the GS-6 level. To address its staff retention issues, Smithsonian conducted a thorough staffing analysis that evaluated security risks and needs at each post within 19 museum properties in the Washington, D.C., and New York, New York, areas. It
developed a staffing plan that promoted some GS-5 level security guards to GS-6, with those in-house security guards posted at higher-risk facility entrance posts. Smithsonian also procured a contractor to fill 70 lower-risk posts in building interiors that were previously staffed by federal security guards. In doing so, Smithsonian officials reported the agency has addressed its staff retention challenges and restructured its security workforce.

Officials from the four selected federal agencies (Air Force, Army, Smithsonian, and TSA) that had undergone a workforce transition cited upfront planning in assessing facility security and staffing needs, including administrative support and training requirements, as a key lesson learned in facilitating a security workforce transition. These officials reported that changing their staffing approach was a challenging undertaking and upfront planning to assess and identify facility security and staffing requirements was critical to a successful transition. Officials further noted that this planning should also include an assessment of the organization’s administrative and training capabilities that are necessary to support the security workforce. We have previously reported that assessing and determining facility security and staffing needs is a key practice and element in a risk management approach for allocating resources in facility protection.29

29GAO-05-49.
Officials from the Smithsonian, which voluntarily changed its staffing approach, told us that conducting detailed security and staffing needs assessments based on risk management helped the transition to its current approach of using both federal and contract security guards. Until recently, the Smithsonian had primarily used federal security guards to protect its 19 museum facilities and assets. Faced with an increasing turnover rate of its federal security workforce, budget constraints, and the need to increase security presence at its facilities, Smithsonian officials told us they developed the current staffing strategy after drawing on several staffing analyses undertaken over the years. Components of the multiple facility security and staffing needs assessments included an examination of job functions of the security guards, security needs and risk level of each facility, and actual staffing needs for each post by shift. The agency also looked at post needs in terms of post hours required by shift, rather than the number of people (i.e., FTEs) required to staff the post. From these analyses, the agency determined that it could change its staffing approach and reduce costs for some low-risk posts by using a contract workforce and eliminating some posts. Since 2009, the Smithsonian has used contract staff, who are generally posted at lower-risk interior areas of some buildings to monitor collections, while continuing to use federal security guards at higher-risk areas, such as the museum entrance lobbies to screen visitors.

By contrast, the Army and Air Force were temporarily allowed to change their staffing approaches, and TSA was required to use an in-house security force when the agency was created. Officials from these agencies stated that, in hindsight, they believe their workforce transitions would have benefited from more upfront planning, including assessing their security and staffing needs. For instance, in 2006, the Army assessed its staffing and post needs and requirements, including determining the baseline service hours needed at each security post, after transitioning from a federal workforce to a contract one in 2002. The Army had originally replaced its in-house staff with contract staff on a one-to-one staff exchange without assessing its security and staffing needs at its post.

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30 Officials also noted that as part of its multiple analyses, the Smithsonian determined that no industry-accepted standards, guidelines, or applicable benchmarks for museum security guard staffing existed.

31 As previously noted, Congress authorized DOD to use state and local government and contract security guards at domestic military installations to address the reductions that resulted from federal military personnel being deployed overseas.
military installations and posts. This resulted in what we and its officials later determined were higher-than-necessary contract costs.\textsuperscript{32} Army officials told us that a facility security and staffing needs analysis was not conducted in 2002, when it was originally allowed to change its workforce, because of the relatively short time frame it had for its workforce transition.

Some officials also underscored the importance of assessing the agency’s administrative infrastructure—including its information technology, financial systems, and human capital management—to identify administrative and training requirements and capacities, and to ensure the agency is capable of supporting a change in its staffing approach. TSA officials told us that the agency spent about $60 to $70 million to change and transfer data into a new financial system to manage its federal workforce. Because TSA had to transition airport screeners from a contract workforce hired by the airlines to a federal employee workforce within 1 year, it initially adopted the Department of Transportation’s (DOT) financial and human resources system. However, DOT’s system was not originally equipped or intended to take on a large influx of federal employees, and it proved difficult to use, according to TSA officials. TSA officials told us that, given their initial time constraints, the agency did not have the time and opportunity to plan and assess whether the system had the capacity to handle the increased federal workforce.\textsuperscript{33}

These agencies’ experiences indicate that taking the time and conducting an assessment of facility security and staffing needs prior to any security workforce transitions, should such a transition be mandated or desired by FPS, would likely prove beneficial.\textsuperscript{34} FPS has recently taken some actions to assess its staffing needs based on risks, but the outcomes of these efforts are yet to be determined. For instance, FPS has developed federal workforce requirements and has incorporated workload data and facility risk as part of its workforce analysis. However, a final workforce analysis


\textsuperscript{33}The Aviation and Transportation Security Act of 2001 created TSA and required the agency to employ and use federally employed screeners at 429 commercial airports nationwide within 1 year of the passage of the Act.

\textsuperscript{34}As previously mentioned, there is congressional interest in requiring FPS to examine the effectiveness of using federal employees to staff the security guard positions at the highest-risk federal facilities. H.R. 176, 112\textsuperscript{th} Cong. (2011).
plan is under executive review with OMB; and, as the details of the plan are not yet known, it is unclear whether or the extent to which it will include an assessment of the types and numbers of security positions needed, as well as associated job functions, roles, and responsibilities.  

Additionally, FPS is in the process of developing a Risk Assessment Management Program (RAMP) system, which among other things, is designed to improve its ability to manage security at federal facilities and allocate resources based on risks. While these efforts may help provide a foundation for assessing its security and staffing needs, it is uncertain how much FPS could use them to assess and identify other staffing approaches and options that would be beneficial and financially feasible for protecting federal facilities. When changing their staffing approaches, other agencies found it helpful to assess security needs and risk level of each facility, identify specific job functions of its workforce, and link actual security and staffing needs for each post and facility.

Additionally, an administrative and support capability assessment may be particularly important if FPS were to transition to primarily using federal employees to staff the current contract security guard positions because, as noted earlier, the agency’s hiring, personnel, and administrative responsibilities would increase. As we previously reported, it is important for agencies to be well equipped to recruit and retain security professionals; our literature review also indicated that whether the security staff are in house or contract, the employee selection and training process is critical. When transitioning to an all-inspector staff, FPS experienced delays in its hiring and training process when Congress mandated it to increase the number of federal law enforcement employees, which affected the agency’s ability to bring staff on board and

35GAO-10-802R.

36At your request, we are currently reviewing RAMP and will provide you with a report in July 2011.

37In 2010, we recommended, among other things, that FPS identify alternative approaches and options that would be beneficial and financially feasible for protecting federal facilities. See GAO-10-341.

train them in a timely manner.\textsuperscript{39} If a change in workforce approach involved hiring a large number of new federal employees, it could particularly stretch FPS’s existing administrative and support functions. Determining whether its training needs could be met through the Federal Law Enforcement Training Center (FLETC), which currently provides training for new FPS hires and continues to experience backlogs, or through another entity would appear to be the type of assessment that could lay the groundwork for a smoother transition.\textsuperscript{40}

Finally, TSA officials further commented that a pilot program to phase in staffing changes could help in planning and assessing security and staffing needs. Legislation has recently been introduced in Congress calling for the implementation of a pilot program to examine the effectiveness of using federal employees to staff the current contract security guard positions at selected higher-risk federal facilities.\textsuperscript{41} Pilot programs allow for an alternative staffing approach to be vigorously evaluated, shared systematically with others, and adjusted, as appropriate, before it receives wider application.\textsuperscript{42} We previously reported that when conducting pilot programs, agencies should develop sound evaluation plans before program implementation—as part of the design of the pilot program itself—to increase confidence in the results and facilitate decision making about broader applications of the pilot program. The lack of a documented evaluation plan for the pilot program increases the likelihood that an

\begin{footnotesize}
\textsuperscript{39}GAO-09-749. The Fiscal Year 2008 Consolidated Appropriations Act required FPS to have at least 1,200 full-time employees on board by July 31, 2008. This same requirement for FPS was included in DHS’s fiscal year 2009 appropriations act, and FPS met this staffing level in April 2009 with 1,239 employees on board. However, according to officials, FPS was not able to meet the July 31, 2008, mandate because of the challenges related to shifting its priorities from downsizing its workforce to increasing it in order to comply with the mandate, inexperience working with DHS’s shared service center, and delays in the candidate screening process.

\textsuperscript{40}GAO-10-802R. In addition to FLETC, other federal entities provide law enforcement training for federal employees, such as the VA Law Enforcement Training Center.

\textsuperscript{41}H.R. 176, 112\textsuperscript{th} Cong. (2011).

\end{footnotesize}
agency will not collect appropriate or sufficient data, which limits understanding of the pilot program’s results.  

Selected federal officials also cited the need to determine the appropriate level of oversight and management of its workforce as another lesson in adopting a new workforce approach. In the case of the Army, officials cited the importance of determining at the outset the appropriate level of government oversight needed over its contract staff. In its contracts awarded in 2006, the Army established additional oversight requirements and mechanisms, including developing specific quality assurance plans and requiring full-time contracting officer technical representatives to perform two detailed inspections every 6 months. This was based on the recognition that government oversight requirements in its earlier contract were insufficient. As we previously reported, if the process is well managed, either an in-house or contract approach to staffing a security workforce can result in a uniform security workforce that provides effective security.

As noted earlier, managing and overseeing more than 14,000 contract security guards has proven challenging for FPS, and efforts to implement our recommendations to monitor contractors’ and contract guards’ performance are still under way. For instance, FPS has begun requiring its inspectors to complete two contract security guard inspections a week at level IV federal facilities, and is in the process of providing additional training to its contract security guards. We believe it is important for FPS to continue taking steps to improve its oversight and management of its contract security guards. Changing the makeup of its contract security guard force to an in-house security workforce would continue to require

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44Contracting officer technical representatives are responsible for conducting daily contract oversight; assessing a contractor’s performance; and ensuring that the contractor is meeting all training, certification, and suitability requirements. In 2006, we also reported insufficient oversight as contributing to missing or incomplete training documents for contract staff tasked with securing military installations.


46GAO-10-341.
the need for management and oversight. Some federal officials indicated that oversight and management of a federal workforce is just as important in staffing a security workforce. For instance, Army officials indicated that the job functions of a federal security guard would be no different than those functions performed by contract staff; the agency would have to manage its workforce and have the same expectations and security responsibilities performed. We previously reported that FPS lacks a human capital plan to oversee and manage its federal workforce and recommended it develop a strategic human capital plan.\textsuperscript{47} In 2011, we reported that human capital management of the federal workforce continues to be a high-risk issue area in the federal government and it is essential for agencies to ensure they have the talent and skill mix needed to address current and emerging human capital challenges.\textsuperscript{48} Going forward, in the event FPS looks to change its staffing approach, it will be important to have a strategic human capital plan in place to help manage and guide its current and future workforce planning efforts.

We provided a draft of this report to GSA, Smithsonian, VA, and the Departments of Defense, Homeland Security, and Justice in order to obtain comments from the nine agencies we studied. GSA and DOJ had no comments. Smithsonian, VA, DOD, and DHS provided technical comments that we incorporated where appropriate. DHS also provided written comments that are reprinted in appendix II.

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

If you or your staff members have any questions concerning this report, please contact me at (202) 512-2834 or goldsteinm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may

\textsuperscript{47}GAO-09-749. FPS has not yet implemented our recommendation to develop a strategic human capital plan.

be found on the last page of this report. GAO staff who made major contributions to this report are listed in appendix III.

Sincerely yours,

Mark L. Goldstein
Director, Physical Infrastructure Issues
Appendix I: Objectives, Scope, and Methodology

This report examines approaches used by selected federal agencies in staffing federal facility security workforces. Specifically, the objectives of this report were to identify (1) approaches used by selected federal agencies in staffing their facility security workforces; (2) federal agency and private sector representatives’ views on the benefits and challenges of using contract or in-house security staffing approaches; and (3) lessons that the Federal Protective Service (FPS) can learn from other federal agencies that have changed their security staffing approaches. To provide information on each of these objectives, we reviewed previous GAO reports and industry literature on staffing security workforces and selected a nonprobability sample of federal agencies and private sector companies for our review. Because the selected organizations are a nonprobability sample, the information we obtained are not generalizable. Our selection criteria included: dispersed location of physical facilities and security guard presence, need to balance public access and security at facilities, use of a federally or in-house employed and/or contract security workforce, experience in changing the approach used to staff security positions, and recommendations by security industry experts.

Based on these criteria we selected nine federal agencies and three private sector industries for our review. The selected federal agencies were: (1) FPS, (2) Transportation Security Administration (TSA), (3) U.S. Army (Army), (4) Pentagon Force Protection Agency (PFPA), (5) U.S. Air Force (Air Force), (6) U.S. Marshals Service (USMS), (7) Department of Justice, Justice Protective Service (JPS), (8) Smithsonian Institution (Smithsonian), and (9) Veterans Health Administration (VHA). To gather a range of perspectives from the private sector, we selected three industries: (1) commercial real estate; (2) entertainment, including gaming operations and theme parks; and (3) hospitals. We selected a total of ten companies and associations within these industries from which we interviewed representatives to gather information to research the objectives described below.

To identify approaches used by selected federal agencies in staffing their facility security workforces, we reviewed federal agency documents and data on facility workforce staffing approaches used and conducted interviews with agency officials. We developed, pretested, and had a security expert review a data collection instrument that asked the nine selected federal agencies four questions to gather information about their facility security workforces:

1. the number of full-time equivalent (FTE) facility security staff employed by the agency in fiscal year 2010 within several Office of
Personnel Management (OPM) job series, including police (GS-0083), security guards (GS-0085), and security administration (GS-0080), among others;

2. the primary responsibilities, or job functions, performed by each of the different types of facility security positions employed by each agency in fiscal year 2010;

3. the estimated costs per person for training, recruitment, and equipment for facility security personnel in fiscal year 2010;

4. the estimated fiscal year 2010 budget for overtime salary costs for facility security personnel; and

5. the total number of contract facility security staff hours provided in fiscal year 2010.

To ensure the accuracy of the staffing data collected from the federal agencies, we provided each federal agency with data on the number of FTE employees for security-related positions in OPM’s Central Personnel Data File (CPDF) as of September 2010—the most current available data at the time of our review. We asked each agency to review and verify its CPDF data and provide updated figures for the information requested. We e-mailed this data collection instrument to the audit liaisons at each of the agencies, who then forwarded the instrument to the appropriate officials to provide responses. We contacted agencies, as necessary, to clarify any questions we had on the information provided. We received completed data collection instruments from eight of nine agencies. PFPA did not provide the requested information, but agency officials provided estimated numbers of facility security position types and contract staff. We previously reported that governmentwide data from CPDF for the key variables reported in this report—agency and pay plan or grade—were 96 percent or more accurate.\(^1\) We determined that the information from OPM’s CPDF reported here is sufficiently reliable for our needs. To determine the distribution of in-house and contract security workforce, we used the number of FTE federal employees and the total number of contract hours procured in fiscal year 2010 that were provided by eight of

the nine agencies in the data collection instruments. For PFPA, we used estimated data provided by the agency officials for the number of FTE federal employees and the estimated number of contract staff employed in 2010. We used 1,760 work hours in a year to convert the total number of contract hours in fiscal year 2010 into FTEs. While agencies may use different work hours to convert contract hours to FTE, we used 1,760 work hours in a year, which was used by FPS for a typical federal employee, and included estimated time for annual and sick leave that may be used in a year.

To describe federal agency and private sector representatives’ views on the benefits and challenges of using contract or in-house facility security staffing approaches, we conducted semistructured interviews with officials from each selected federal agency and with executives from ten companies and associations within three private sector industries: (1) commercial real estate, (2) entertainment (including gaming and theme parks), and (3) hospitals. In those interviews, we asked federal agency officials and private sector executives open-ended questions to identify the specific benefits and challenges presented in the use of in-house and contract security workforces. To determine the prevalence of the specific benefits and challenges cited, we completed a content analysis of the interviews. We reviewed the responses to open-ended questions and identified a total of six categories that represented the benefits or challenges for the use of in-house or contract security workforces. We developed a codebook that defined each of the six categories which were cost, personnel issues—which included separate codes for personnel flexibility and personnel responsibilities—staff selection, staff development, staff retention, and contract management. An analyst reviewed each response and assigned a code, then a second analyst reviewed each assigned code. If the two analysts disagreed on any of the assigned codes, the two analysts discussed any differences in the coding until a consensus was reached. We then removed any duplicate responses—instances in which a respondent identified the same benefit or challenge more than once for either in-house or contract security workforces—to ensure that only sole benefits and challenges reported by federal agency officials or private sector executives were reported in our analysis. Finally, we analyzed the coded responses to determine how many federal officials and private sector executives reported each benefit and challenge for using in-house and contract security workforces.

To determine lessons that FPS can learn from other federal agencies that have changed their security staffing approaches, we selected four agencies that had undergone workforce transitions. The selected agencies were the
Appendix I: Objectives, Scope, and Methodology

Army, Air Force, TSA, and Smithsonian. We reviewed agency documents and conducted semistructured interviews with agency officials on the lessons learned in changing and staffing their security workforces. To determine how these lessons may apply to FPS, we reviewed relevant literature from academic and professional organizations and information from prior GAO and agency Inspector General reports, and compared the information collected from each agency with various efforts undertaken by FPS to address its workforce staffing needs. We also interviewed FPS officials regarding an internal preliminary staffing analysis on potential changes to its staffing approach.

We conducted this performance audit from July 2010 through June 2011 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.
Appendix II: Comments from the Department of Homeland Security

June 10, 2011

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


Dear Mr. Goldstein:

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

The Department is pleased to note GAO’s positive recognition of the Federal Protective Service’s (FPS) role as the primary federal agency responsible for security and protecting approximately 9,000 federal facilities and the people on those properties nationwide. As you know, FPS is undertaking efforts to enhance the management and oversight of its in-house and contract security personnel. For example, FPS has taken action to assess staffing needs based on risk by developing federal workforce requirements and incorporating workload data and facility risk as part of this analysis.

Although the draft report does not contain any recommendations, DHS appreciates the lessons learned you have documented. FPS can use these lessons as part of its continuous process improvement efforts to enable better delivery of its law enforcement, security, and emergency response services, which are relied upon by so many others.
Again, thank you for the opportunity to review and comment on this draft report. Technical comments have been provided under separate cover. We look forward to working with you on future Homeland Security issues.

Sincerely,

[Signature]
Jim H. Crumpacker
Director
Departmental GAO/OIG Liaison Office
# Appendix III: GAO Contact and Staff Acknowledgments

## GAO Contact

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

## Staff Acknowledgments

In addition to the individual named above, Maria Edelstein, Assistant Director; Matt Barranca; Brian Chung; David Hooper; Delwen Jones; Jennifer Kim; and Kelly Rubin made key contributions to this report.
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