

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



February 19, 2013

The Honorable Vincent C. Gray
Mayor
District of Columbia
Mayor's Correspondence Unit, Suite 316
1350 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Dear Mayor Gray:

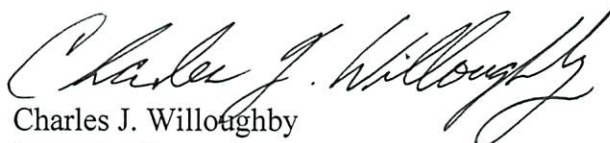
Enclosed please find a copy of a Management Alert Report (MAR 13-I-001), entitled *Lack of Security Measures Observed at the 441 4th Street, N.W. Mailroom Managed by the Department of General Services*, that the Office of the Inspector General (OIG) issued on January 18, 2013, to the Department of General Services (DGS) and the City Administrator. DGS's response to the MAR, dated February 8, 2013, is also enclosed.

The observed deficiencies in the mailroom increase the risk of theft and compromise official and private correspondence and other information received and processed in this facility. Additionally, the deficiencies may also jeopardize safety by allowing potentially dangerous packages and envelopes to go unchecked.

Although the OIG is not conducting an inspection or special evaluation of DGS, we are providing this information to you so that you will be aware of the issue and the actions proposed by DGS.

If you have questions, please contact Alvin Wright, Jr., Assistant Inspector General for Inspections and Evaluations, at (202) 727-2540.

Sincerely,


Charles J. Willoughby
Inspector General

CJW/gah

Enclosures

cc: See distribution list

DISTRIBUTION:

Mr. Allen Y. Lew, City Administrator, District of Columbia (via email)
The Honorable Phil Mendelson, Chairman, Council of the District of Columbia (via email)
The Honorable Kenyan McDuffie, Chairperson, Committee on Government Operations, Council of the District of Columbia (via email)
Mr. Brian Flowers, General Counsel to the Mayor (via email)
Mr. Christopher Murphy, Chief of Staff, Office of the Mayor (via email)
Ms. Janene Jackson, Director, Office of Policy and Legislative Affairs (via email)
Mr. Pedro Ribeiro, Director, Office of Communications, (via email)
Ms. Nyasha Smith, Secretary to the Council (1 copy and via email)
Dr. Natwar M. Gandhi, Chief Financial Officer (via email)
Mr. Mohamad Yusuff, Interim Executive Director, Office of Integrity and Oversight, Office of the Chief Financial Officer (via email)
Ms. Yolanda Branche, D.C. Auditor
Mr. Phillip Lattimore, Director and Chief Risk Officer, Office of Risk Management (via email)
Mr. Steve Sebastian, Managing Director, FMA, GAO, (via email)
The Honorable Eleanor Holmes Norton, D.C. Delegate, House of Representatives,
Attention: Bradley Truding (via email)
The Honorable Darrell Issa, Chairman, House Committee on Oversight and Government Reform, Attention: Howie Denis (via email)
The Honorable Elijah Cummings, Ranking Member, House Committee on Oversight and Government Reform, Attention: Yvette Cravins (via email)
The Honorable Trey Gowdy, Chairman, House Subcommittee on Health Care, the District of Columbia, the Census and the National Archives, Attention: Anna Bartlett (via email)
The Honorable Danny Davis, Ranking Member, House Subcommittee on Health Care, the District of Columbia, the Census, and the National Archives, Attention: Yul Edwards (via email)
The Honorable Thomas Carper, Chairman, Senate Committee on Homeland Security and Governmental Affairs, Attention: Holly Idelson (via email)
The Honorable Susan Collins, Ranking Member, Senate Committee on Homeland Security and Governmental Affairs, Attention: Daniel Jenkins (via email)
The Honorable Daniel K. Akaka, Chairman, Senate Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia, Attention: Aaron Woolf (via email)
The Honorable Ron Johnson, Ranking Member, Senate Subcommittee on Oversight of Government Management, the Federal Workforce, and the District of Columbia
The Honorable Harold Rogers, Chairman, House Committee on Appropriations, Attention: Kaitlyn Eisner-Poor (via email)
The Honorable Nita Lowey, Ranking Member, House Committee on Appropriations, Attention: Laura Hogshead (via email)
The Honorable Jo Ann Emerson, Chairwoman, House Subcommittee on Financial Services and General Government, Attention: John Martens (via email)
The Honorable José E. Serrano, Ranking Member, House Subcommittee on Financial Services and General Government, Attention: Laura Hogshead (via email)

Letter to Mayor Gray
February 19, 2013
Page 3 of 3

The Honorable Barbara Mikulski, Chairwoman, Senate Committee on Appropriations, Attention:
Ericka Rojas (via email)

The Honorable Thad Cochran, Ranking Member, Senate Committee on Appropriations

The Honorable Richard Durbin, Chairman, Senate Subcommittee on Financial Services and
General Government, Attention: Marianne Upton (via email)

The Honorable Jerry Moran, Ranking Member, Senate Subcommittee on Financial Services and
General Government, Attention: Dale Cabaniss (via email)



DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL
CHARLES J. WILLOUGHBY
INSPECTOR GENERAL

INSPECTIONS AND EVALUATIONS DIVISION
MANAGEMENT ALERT REPORT

DEPARTMENT OF GENERAL SERVICES

**LACK OF SECURITY MEASURES OBSERVED AT THE 441
4TH STREET, N.W. MAILROOM MANAGED BY THE
DEPARTMENT OF GENERAL SERVICES**

MAR 13-I-001

JANUARY 18, 2013

Inspections and Evaluations Division
Mission Statement

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness, and economy in operations and programs. I&E's goals are to help ensure compliance with applicable laws, regulations, and policies, identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to D.C. residents and others who have a vested interest in the success of the city.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



January 18, 2013

Brian J. Hanlon
Director
Department of General Services
2000 14th Street, N.W., 8th Floor
Washington, D.C. 20009

Allen Y. Lew
City Administrator
Office of the City Administrator
1350 Pennsylvania Avenue, N.W., Suite 533
Washington, D.C. 20004

Dear Mr. Hanlon and Mr. Lew:

This is a Management Alert Report (MAR 13-I-001) to inform you that the Office of the Inspector General (OIG) observed security deficiencies at the mailroom managed by the Department of General Services (DGS) in 441 4th Street, N.W. The observed deficiencies significantly increase the risk of theft and compromise official and private correspondence and other information received and processed in this facility. They may also compromise safety by allowing potentially dangerous packages and envelopes to go unchecked. The OIG issues MARs when it believes a matter requires the immediate attention of District government officials.

Background

DGS's mission is to "elevate the quality of life for the District with superior construction, first-rate maintenance and expert real estate management." DGS's Facilities Management (FM) Division is "responsible for the day-to-day operation of a large number of District-owned and [-]managed properties including schools, recreation centers, fire and emergency facilities, municipal office buildings, vacant lots[,] and homeless shelters." The FM Division "maintains building assets and equipment; performs various repairs and structural improvements and provides janitorial, postal, and engineering services." It also operates mailrooms at 441 4th Street, N.W.¹ and 1350 Pennsylvania Avenue, N.W. (John A. Wilson Building),² and is responsible for pick-up and/or delivery of mail for 43 District government agencies at 21 different addresses throughout the city.

¹ Some of the District agencies located at 441 4th Street, N.W. are the District of Columbia Department of Human Resources, Office of the Attorney General, Office of Administrative Hearings, and Office of the State Superintendent of Education.

² The OIG inspector conducted an observation at the John A. Wilson Building and did not find any security issues like the ones identified at 441 4th St. N.W., which we discuss in this MAR.

Both the United States Postal Inspection Service (USPIS),³ and the United States Postal Services (USPS) provide guidance on the security of mail operations. In its guide to mail center security, the USPIS warns that:

[M]ail centers are much more likely to experience problems caused by common crimes such as theft. Security is vital to mail center operations large and small.

Lack of security can result in theft of supplies, postage, mail, and any valuable information . . . contained in sensitive mail.

To make your mail center secure and to reduce risks and losses, your company should have policies and procedures for the following:⁴

- Personnel security[;]
- Access control[;]
- Registered MailTM and high-value shipments[;]
- Company funds[; and]
- Postage meters.

The USPIS also notes:

The vulnerability [of the] workplace depends on a variety of factors, both internal and external. No individual or company is completely immune from attack. The security officer and top management should meet to evaluate the probability of or its personnel becoming targets for package bombs or bomb threats.

In addition, the USPS provides the following guidance with respect to deterring mail center theft:⁵

Measures to Deter Theft

4. Ensure adequate supervision of mail center employees, who may have access to thousands of dollars worth of merchandise, remittances, and company credit cards[;]
5. Control access to your mail center and handling areas. Use of sign-in/out sheets, card key access control systems, and photo identification badges are all effective security procedures. Extend this control to all employees including cleaning and maintenance personnel[; and]

³ “The mission of the U.S. Postal Inspection Service is to support and protect the U.S. Postal Service and its employees, infrastructure, and customers” <https://postalinspectors.uspis.gov/aboutus/mission.aspx> (last visited Dec. 5, 2012).

⁴ See <http://about.usps.com/publications/pub166.pdf> (last visited Dec. 5, 2012).

⁵ <http://about.usps.com/publications/pub166.pdf> (last visited Nov. 14, 2012).

6. Enforce limited access to mail center. Only authorized employees should be allowed in the working areas of the mail center

Mail Center Security Checklist

- Ensure that mailroom location, furniture, and mail flow provide maximum security[;]
- Install alarms and surveillance equipment[;]
- Limit mailroom access to authorized personnel[;] . . .
- Lock high-value items overnight[;] . . .
- Do not leave mail in an unsecured area, and deliver outgoing mail directly to Postal Service custody[; and] . . .
- Ensure that [a] supervisor can see all employees and work areas.

Observations

1. **The OIG observed security deficiencies at the mailroom managed by DGS in 441 4th Street, N.W. that may: 1) significantly increase the risk of theft and compromise official and private correspondence and other information received and processed in this facility; and 2) compromise individual and building safety by allowing packages and envelopes that may be potentially dangerous to go unchecked.**

On November 6, 2012, during business hours, an OIG inspector opened an unsecured door near the main lobby of 441 4th Street, N.W., (Appendix 1) and walked into a hallway leading to the entrance of the building's mailroom, which consists of a clear glass panel and a clear glass door (Appendix 2). While looking into the room, the inspector did not see anyone behind the counter near the front of the room. The door lacked signage identifying the office as the mailroom. In the hall in front of the glass panel was a large bag cart containing numerous small and large envelopes on which names and other information were visible to the inspector (Appendix 2). The inspector, or anyone passing by, could read, tamper with, or take the information and mail (see Appendices 2 and 3). A sign above the bag said "Mail Drop Bag." The cart was on wheels and the inspector could have rolled it away easily. The inspector opened the unlocked glass entrance door and walked into the mailroom's reception area. No employees appeared and the inspector observed two packages on the counter and two boxes marked "Outgoing Mail" (Appendix 4). An open door to the left of the counter led to a room in which mail is apparently sorted and other processing is completed (Appendix 5). Like the reception area, there were no employees in this room. Just before the inspector left the area, an employee entered the mailroom through the main entrance and asked if the inspector needed assistance.

Shortly after the visit, the inspector requested and received DGS's mail route manifest. The inspector visited 10 other locations where DGS provides mail services to a District government agency.⁶ At the locations observed, the inspector did not find any security issues like the ones identified at 441 4th Street N.W.

⁶ DGS provided the OIG with a manifest for its "uptown" and "downtown" mail routes. The addresses listed on the manifests are buildings where DGS picks up and/or drops off mail for a District government agency.

2. The OIG also requested a copy of DGS's mailroom policies and procedures. These policies and procedures lacked information on mailroom security or safeguarding mail.

The OIG also requested a copy of DGS's mailroom policies and procedures. DGS managers forwarded a two-page document titled "overview of the DGS Mailroom Services" that lacked specific information or protocols related to mailroom security or safeguarding mail. According to this document, a memorandum of understanding (MOU) is required for outgoing mail metering services. The OIG requested copies of DGS's MOUs with District government agencies using metering services, but DGS could provide only one. When asked if DGS provides mail services to District government agencies without an MOU, DGS managers replied "Yes."⁷ However, DGS managers appeared to be uncertain about what District government agencies are on its mail routes. For example, the OIG's mail at 717 14th Street N.W., is handled and metered by DGS, but the OIG's address was not listed on the mail route manifests provided to the inspector, and a DGS manager stated they "had no record" of an MOU with OIG. Consequently, the manager consulted with DGS employees and learned that the OIG is an agency DGS services. As a result, the DGS manager added the OIG to the mail route manifest.

Conclusions

The lack of security measures observed at the 441 4th Street, N.W. mailroom raises concerns that similar problems may exist in other District-government occupied buildings not observed by the OIG. The entrances to the 441 4th Street N.W., mailroom were unlocked and accessible not only to building tenants, but also members of the public who have been permitted to enter the building. In addition, a large amount of unsecured mail was in plain view and accessible to anyone passing by within the building. Finally, no employees were stationed in the unsecured mailroom for a time period long enough to prevent tampering or theft. These deficiencies put the District at risk for tampering or theft of any sensitive, confidential, or personal information the mail might contain. Such security lapses also may endanger employees and visitors to District government agencies if the mailroom is unattended and a potentially dangerous package arrives and is not checked or handled by an authorized person. As the USPIS notes, no matter how large the mail center, basic security practices and a demonstrated interest in security can protect employees and the public and may deter potential criminal activity.

The OIG also found that DGS's mailroom policies and procedures lacked guidance about security. Because there is no set of comprehensive policies and procedures associated with mailroom security, employees may be adhering to varying levels of security protocols based upon unofficial practices. It is also possible that neither official nor unofficial mailroom security protocols exist in some agencies. Additionally, it appears that DGS does not have MOUs with some District government agencies to which it provides mail services. By providing mail services without an MOU, DGS and recipient agencies may fail to clearly define agency responsibilities, liability, cost, compliance, monitoring, and provisions for termination or modification. In addition, the list of agencies on the DGS mail route manifest appears to be incomplete. Consequently, mail services are being provided without either MOUs or the awareness of some DGS managers.

⁷ When asked about the difference between mail services provided to an agency with an MOU compared to one without, DGS managers stated that agencies with an MOU have a "metering account," while agencies without one only have their mail delivered by DGS.

Recommendations

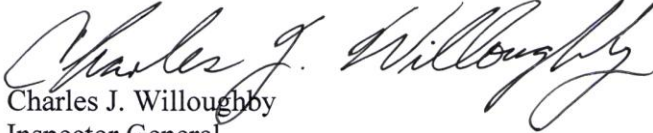
The OIG recommends:

1. That the Director of the Department of General Services (D/DGS) act immediately to correct the most obvious security deficiencies at the 441 4th Street N.W., mailroom such as exposed and vulnerable mail and an unattended work area.
2. That the D/DGS coordinate with all agency heads and facility managers that it serves to conduct comprehensive security assessments of all mailrooms and mail operations within District government-occupied buildings.
3. That, based on the security assessment results, the D/DGS implement permanent, comprehensive security measures and policies and procedures at the 441 4th Street, N.W. mailroom and all other District-government mailrooms, and for government mail activities, to ensure their security and safety.
4. That the D/DGS ensure that it has a current MOU with all District government agencies to which it provides mail services.
5. That the City Administrator direct all District agencies that do not use DGS's mail services to ensure that mail operations focus on: (a) security and safety; and (b) are guided by formal policies and procedures to prevent the compromise of information on and in mail, loss, theft, tampering, and the introduction of dangerous packages into their buildings.

Please provide your comments to this MAR by February 1, 2013. Your response should include actions taken or planned, dates for completion of planned actions, and reasons for any disagreement with the concerns and recommendations presented. Please distribute this MAR only to those who will be directly involved in preparing your response.

Should you have any questions prior to preparing your response, please contact Gabrielle Aponte Henkel, Director of Planning and Inspections, at (202) 727-9527.

Sincerely,


Charles J. Willoughby
Inspector General

CJW/gah

cc: The Honorable Kenyan McDuffie, Chairperson, Committee on Government Operations,
Council of the District of Columbia (via email)

APPENDICES

APPENDICES

- Appendix 1: Lobby door at 441 4th Street, N.W. leading to the mailroom
- Appendix 2: Main entrance to the mailroom
- Appendix 3: "Mail Drop Bag"
- Appendix 4: Inside the mailroom
- Appendix 5: Open door leading to internal room within the mailroom
- Appendix 6: Envelope marked "Confidential"

APPENDICES

Appendix 1: Lobby door at 441 4th Street, N.W. leading to the mailroom



APPENDICES

Appendix 2: Main entrance to the mailroom



APPENDICES

Appendix 3: "Mail Drop Bag" [Redacted to protect personal privacy interests.]



APPENDICES

Appendix 4: Inside the mailroom



APPENDICES

Appendix 5: Open door leading to internal room within the mailroom



APPENDICES

Attachment 6: Envelope marked "Confidential." (Observed on January 7, 2013.)

CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL -- CONFIDENTIAL

RWP DPAA PARTICIPATION REPORT (D) GOVERNMENT FORM - US16

RWP DPAA PARTICIPATION REPORT (D)

MAILDROP INFORMATION

DISTRICT OF COLUMBIA

MAILDROP LOCAL MAILDROP NAME OR PLACE
LINE 3 C-----
RECEIVING MAILDROP STREET ADDRESS
LINE 4 C-----
RECEIVING MAILDROP CITY STATE ZIP
LINE 5 C-----
RECEIVING ATTENTION TO WHOM

COORDINATOR DHS
CO-ORD PHONE (###) ###-#### XXXXX
COMMENTS MAILDROP COMMENT LINE NUMBER ONE
MAILDROP COMMENT LINE NUMBER TWO

RECIPIENT INFORMATION

DEPARTMENT OF HUMAN SERVICES

RECIPIENT MAGGIE ZIMMERMAN COMMENTS DEPT. PUBLIC AND ASSISTED HOUSING
PHONE (###) ###-#### XXXXX 1100 NORTH CAPITOL STREET N.E. SW 940
ACCT INFO SUSPENSE REPORT ACCOUNT NUMBER WASHINGTON, D.C. 20002
SHORT NAME MAGGESS DIST. ORIG. SHORT NAME MAGGESS REQUESTOR SHORT NAME MAGGESS

OFFICE OF INFORMATION SYSTEMS

REPORT ID: WR1000A REPORT NAME: RWP DPAA PARTICIPATION REPORT DISTRIBUTION ID: WR1000A
REPORT CYCLE: DA112.25 COMMENT: (DAILY) BUNDLE CYCLE: 909
REPORT PAGES: 1 BUNDLE JOBNAME: T8MSBUND144250 BUNDLE DATE: 03 JAN 2013.003
REPORT WDS: 12 CREATE JOBNAME: ACP1000 (144194) BUNDLE TIME: 22.17.53
BDDM DATE: 03 JAN 2013.003 ACQUA TIME: 20.18.58 WDDUP ID: ACP0

DISTRIBUTION MESSAGE



**Government of the
District of Columbia**

Office of the Inspector General

*Report Fraud, Waste,
Abuse, or Mismanagement to:*

**Charles J. Willoughby
Inspector General**

Toll Free Hotline:

**1-800-521-1639
or 202-724-TIPS (724-8477)
or hotline.oig@dc.gov**

All calls are Confidential.

Address:

**Office of the Inspector General
717 14th Street, NW
Suite 500
Washington, D.C. 20005**

Web Page: www.oig.dc.gov

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF GENERAL SERVICES



To: Charles Willoughby
Inspector General

From: Brian Hanlon, Director *BH*
Department of General Services

Date: February 8, 2013

Subject: MAR 13-I-001 - Responses and Action Plan related to Mailroom Services

In response to the **OIG MAR 13-I-001 received January 22, 2013**, DGS offers the following response and Action Plan:

1. DIRECTOR OF THE DEPARTMENT OF GENERAL SERVICES (D/DGS) act immediately to correct the most obvious security deficiencies at the 441 4th Street, N.W., mailroom such as exposed and vulnerable mail and an unattended work area.
 - a. *Action Taken*
 - i. Ensure all mail is accepted by mailroom staff.
 - ii. Exterior mail drop bag relocated to interior space under the supervision and control of mailroom staff.
 - iii. Ensure mailroom door is closed and locked when mailroom staff is not present.
 - iv. Secure all mail within the confines of the locked mailroom processing area.
 - b. *Action Planned*
 - i. Assess feasibility of modifying entry way to include secured mail drop for tenants when mailroom staff is out of the office.
 1. Projected completion date is March 2013.
 - ii. Install signage throughout, specifying operational areas and access rights for staff versus customers.
 1. Projected completion date is end of February 2013.
 - iii. Modify written ***DGS Mail Services*** document to include specific operating procedures which would expand procedural detail pertaining to staff mail handling protocols and service levels provided by DGS to agency customers.
 1. Projected completion date is end of FY 2013.
 - iv. Increase staff and management awareness through specific mail handling training consistent with USPS standards.
 1. Projected completion date is end of FY 2013.

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF GENERAL SERVICES



-
2. D/DGS coordinate with all agency heads and facility managers that it serves to conduct comprehensive security assessments of all mailrooms and mail operations within District government-occupied buildings.
 - a. *Action Planned*
 - i. PSPD to conduct complete physical security assessment of mailroom locations under the purview of D/DGS. Specifically, assess feasibility of installing proximity card readers on mailroom door(s) and feasibility of installing security cameras in mailroom lobby and mailroom processing area(s).
 1. Projected completion date is March 2013.
 - b. *Comments/Reasons for Disagreement*
 - i. While D/DGS is in agreement that this is a worthwhile recommendation, many agencies (DCPS, OTR, etc.) have complete autonomy as it relates to mailroom operations and DGS has no operational responsibility for most District mail rooms. (see attachment which demonstrates other agencies with mail operations).
 - ii. The D/DGS has oversight and complete operational responsibility for two staffed mailroom locations (OJS and Wilson Buildings).
 - iii. Of the many "mailrooms"/spaces throughout the city for which agencies sort and retrieve mail delivered by USPS, D/DGS mail staff has access to (not operational responsibility for) five other locations including: Reeves Municipal Center, DC General Hospital, 717 14th St., NW, Unified Communications Center, and Southwest Waterfront. In the absence of a DGS-operated mailroom or an agency-operated mailroom to which we have access, services provided by D/DGS at various locations throughout the city include drop off and pick-up directly to agency clients.
 3. Based on the security assessment results, the D/DGS implement permanent, comprehensive security measures and policies and procedures at the 441 4th Street, NW mailroom and all other District-government mailrooms, and for government mail activities, to ensure their security and safety.
 - a. *Action Planned*
 - i. D/DGS will implement appropriate security measures based on industry standard and USPS recommended security methods at mailroom operations under its purview, specifically 441 4th Street, NW and Wilson Building.
 1. Projected completion date is to be determined.
 - b. *Comments/Reasons for Disagreement*
 - i. Implementation timeframes to be established based on the scope of the required modification.
 4. D/DGS ensure that the Mailroom is currently funded out of fixed cost to which it provides mail services.
 - a. *Action Planned*

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF GENERAL SERVICES



-
- i. Establish a procedural MOU or other operational agreement with all agencies to which D/DGS provides mail services.
 - 1. Projected completion date is FY2013.
 - b. *Comments/Reasons for Disagreement*
 - i. The funding for mail services is already incorporated within the fixed costs budget for client agencies. A procedural MOU/MOA or other operating agreement documenting policies procedures shall be effectuated.
5. That the City Administrator direct all District agencies that do not use DGS's mail services to ensure that mail operations focus on; (a) security and safety; and (b) are guided by formal policies and procedures to prevent the compromise of information on and in mail, loss, theft, tampering, and the introduction of dangerous packages into their buildings.
- a. *Comments/Reasons for Disagreement*
 - i. Awaiting Office of the City Administrator to give direction.

Attachment:

Mail Operation Purchase Order Report

cc: Allen Lew, City Administrator
Scott Burrell, DGS, Chief Operating Officer

