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BUILDING SECURITY

Interagency Security Committee Has Had Limited Success in Fulfilling Its Responsibilities



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Abbreviations

AOUSC	Administrative Office of the United States Courts
CIA	Central Intelligence Agency
DHS	Department of Homeland Security
DOC	Department of Commerce
DOD	Department of Defense
DOE	Department of Energy
DOJ	Department of Justice
DOL	Department of Labor
DOS	Department of State
DOT	Department of Transportation
Education	Department of Education
EPA	Environmental Protection Agency
FPS	Federal Protective Service
GSA	General Services Administration
HHS	Department of Health and Human Services
HUD	Department of Housing and Urban Development
Interior	Department of the Interior
ISC	Interagency Security Committee
OHS	Office of Homeland Security
OMB	Office of Management and Budget
PBS	Public Buildings Service
SSA	Social Security Administration
Treasury	Department of the Treasury
USDA	Department of Agriculture
USMS	U.S. Marshals Service
USPS	U.S. Postal Service
VA	Department of Veterans Affairs



G A O

Accountability * Integrity * Reliability

United States General Accounting Office
Washington, DC 20548

September 17, 2002

The Honorable Joseph I. Lieberman, Chairman
Committee on Governmental Affairs
United States Senate

The Honorable Robert F. Bennett
United States Senate

In the wake of the events of September 11, 2001, you requested information regarding critical infrastructure protection within the federal government. In response to your October 4, 2001, letter and discussions with your offices, we are preparing two products on federal facility infrastructure protection. For this first report, we reviewed the activities performed by the Interagency Security Committee (ISC) since it was created by Executive Order 12977 in October 1995 (see app. I). The ISC is chaired by the General Services Administration (GSA) and comprises 14 department-level agencies and other executive agencies and officials. It has three primary security responsibilities for nonmilitary activities: (a) establish policies for security in and protection of federal facilities; (b) develop and evaluate security standards for federal facilities, develop a strategy for ensuring compliance with such standards, and oversee the implementation of appropriate security measures in federal facilities; and (c) take such actions as may be necessary to enhance the quality and effectiveness of security and protection of federal facilities. With the various recent proposals to create a Department of Homeland Security (DHS), we have expanded our work to include the implications of the proposed department on ISC.¹ The second report will discuss the responsibilities of federal agencies to protect federal buildings they control and/or occupy.

The objectives of this first review were (1) to determine the extent to which the ISC had fulfilled the responsibilities established for it by the executive order and (2) to identify the potential implications of the proposed DHS on ISC and its responsibilities. To meet our review objectives, we reviewed ISC documents, relevant executive orders, and proposed DHS legislation; and we interviewed past and present GSA

¹The President's proposal to Congress, June 18, 2002, to create a Department of Homeland Security; H.R. 5005, 107th Cong. (2002); S. 2452, 107th Cong. (2002).

officials, 17 of 21 ISC participants, and Office of Management and Budget (OMB) representatives. We requested comments on a draft of this report from the OMB Director, the Administrator of GSA, the Office of Homeland Security's (OHS) General Counsel, and from ISC agencies participating in the review. We received comments from 17 agencies. The Departments of Commerce (DOC), and the Interior (Interior); the Environmental Protection Agency (EPA); and OHS did not provide comments on the report.

Results in Brief

ISC has carried out some elements of its responsibilities, but it has made little progress on several other assigned responsibilities. Over its 7-year existence, ISC has developed and issued security design criteria and minimum standards for building access procedures; disseminated information to member agencies, for their consideration and implementation, on entry security technology for buildings needing the highest security levels; and, through its meetings and 13 working groups, provided a forum for federal agencies to discuss security-related issues and share information and ideas. On the other hand, ISC has made little or no progress in other elements of its responsibilities, such as developing and establishing policies for security in and protection of federal facilities, developing a strategy for ensuring compliance with security standards, overseeing the implementation of appropriate security in federal facilities, and developing a centralized security database of all federal facilities.

Representatives from agencies that participate on ISC had several positive comments about the committee, such as that it provides a vehicle for coordination and cooperation among federal agencies and a forum for agencies to discuss security topics of common interest. However, agency representatives also raised significant concerns about ISC's overall effectiveness, the way it is operated, and the lack of progress in certain areas. Agency representatives identified several factors that they believe have contributed to ISC's limited progress. These factors include (1) the lack of consistent and aggressive leadership by GSA, (2) inadequate staff support and funding for ISC, and (3) ISC's difficulty in making decisions. GSA, which chairs ISC, has acknowledged these factors, promised full support, and initiated efforts to address them, such as establishing a charter and voting process and initiating the process to provide a full-time staff person to support ISC.

If DHS is created, it would have significant implications for ISC and its responsibilities.² While the need for ISC, or an organization like ISC, would likely continue with the creation of a DHS, leadership responsibility for ISC could shift from GSA to DHS, and ISC's responsibilities, role, membership, and operation could change. Under DHS proposals, responsibility for federal building security would be transferred from GSA and possibly other federal agencies to DHS, and DHS's responsibilities could vary depending on the legislation enacted to create DHS. GSA's and other federal entities' responsibilities for other facilities management functions would not be affected. The transfer of security responsibilities would separate security from other facility management functions, such as the siting, design, and construction of federal buildings, which play an important role in the provision of appropriate and effective security. DHS would need to work through ISC or some other vehicle to see that security is appropriately integrated with other facility management functions. DHS and ISC could also have a role in overseeing security protection for executive branch officials for whom no single government agency or official is responsible.

We are making recommendations to the Administrator of GSA, as chair of the ISC, and to the Director of OMB, because of his responsibility under Executive Order 13267 for establishing a transition planning office for DHS. Our recommendations are aimed at addressing the concerns that agency officials identified in the management of ISC, as well as ensuring that coordination exists between building security and other facility management functions, contingent upon a new DHS assuming responsibility for federal building security. Also, ISC's future depends largely on how Congress defines DHS's role for federal facility security. The pending bills to create DHS would establish different roles for DHS. Therefore, we are including as a matter for congressional consideration that Congress clarify the scope of DHS's authority and responsibilities for federal facility security in any legislation enacted to create a DHS. Then, ISC's role in federal facility security can be determined based on the legislation enacted to create DHS. GSA and OMB concurred with our recommendations.

²All current bills on the proposed creation of DHS would move the Federal Protective Service from GSA to DHS. In addition to providing security for GSA-owned and -occupied facilities, the Service also provides the secretariat for ISC.

Background

The federal government owns or leases more than 3.2 billion square feet of space in 12 categories, such as office, housing, and storage space. Office space is the largest of the 12 categories, representing about 23 percent of the total, or about 758 million square feet. The three largest holders of owned and leased office space are GSA, with about 292 million square feet; defense agencies, with about 191 million square feet; and the U.S. Postal Service (USPS), with about 190 million square feet.³ In addition to these three agencies, over 30 other executive branch organizations have some level of authority to purchase, own, or lease office space or buildings. (See app. II for a listing of these organizations.) In general, agencies are responsible for the security of the buildings they own or acquire. GSA assigns space to many federal agencies in GSA-owned or -leased space; for example, postal facilities are sometimes located in GSA space. GSA sometimes delegates the security responsibility for assigned space to the agency occupying that space.

Federal agencies provide security with their own police force or security personnel; by contracting with the private sector for security; or by using another agency to provide security, which in turn may provide security with federal employees or contract guards. Within GSA, the Federal Protective Service (FPS), which is currently a component of the Public Buildings Service (PBS), is responsible for primary security for GSA-owned or -leased properties. FPS may delegate this responsibility to agencies assigned space in a GSA building. The bills currently being considered by Congress to create DHS would transfer FPS and its functions from GSA to DHS. It is unclear whether FPS's responsibilities would remain the same under DHS or would be expanded to include more than just GSA-owned or -leased properties, although H.R. 5005, as passed by the House of Representatives, would specifically give DHS the responsibility to protect buildings and grounds and property that are owned, occupied, or secured by the federal government, including any agency, instrumentality, or wholly owned or mixed-ownership government corporation. In addition, the U. S. Secret Service provides security for the White House complex and certain other executive branch buildings. The

³The data on owned and leased space are taken from the GSA reports *Summary Report of Real Property Owned*, June 2001, and *Summary Report on Real Property Leased*, June 2001. We issued a report, U.S. General Accounting Office, *Federal Real Property: Better Governmentwide Data Needed for Strategic Decisionmaking*, [GAO-02-342](#) (Washington, D.C.: Apr. 16 2002), concerning the accuracy of the data in GSA's report, *Summary Report of Real Property Owned*. However, although we reported that some of the data are outdated or incomplete, the GSA reports are the only sources available that provide estimates of governmentwide ownership and leasing.

Marshal of the Supreme Court and the Supreme Court Police provide security for the Supreme Court; however, the Department of Justice's (DOJ) U. S. Marshals Service (USMS) and GSA provide security for other federal courts, which may be located in federal office buildings that house several federal agencies. The U.S. Capitol Police are responsible for the security of the Capitol complex, including the Capitol and House and Senate office buildings; but GSA is responsible for the security of office space it provides to Members in their home states or districts.

According to an FPS official, FPS had a staff on board of approximately 1,135, consisting of approximately 574 uniformed officers, 108 physical security specialists, and 453 administrative and other personnel. FPS's fiscal year 2002 budget is \$362.1 million, of which about \$207 million is spent on contract guard services. Additionally, GSA is slated to spend over \$300 million more from its reimbursable program for contract guard services, according to the official.⁴ This total of over \$500 million for contract guard services will fund approximately 7,300 contract guards according to the FPS official.

The day after the April 19, 1995, bombing of the Alfred P. Murrah federal building, the president directed DOJ to assess the vulnerability of federal office buildings in the United States, particularly to acts of terrorism and other forms of violence. On June 28, 1995, DOJ issued a report entitled *Vulnerability Assessment of Federal Facilities*. In this report, DOJ included security levels designated I through V for office buildings (see app. III for the definitions of these security levels), minimum security standards for office buildings, and, as one of its recommendations, the creation of ISC to provide a permanent body to address continuing governmentwide security concerns.

Prior to 1995 there were no governmentwide standards for security at federal buildings. On October 19, 1995, Executive Order 12977 established ISC to develop, among other things, such standards for buildings and facilities occupied by federal employees for nonmilitary activities. The committee was to be made up of the Administrator, GSA; representatives from the 14 department-level agencies; EPA; the Central Intelligence Agency (CIA); OMB; the Director, USMS; the Assistant Commissioner, FPS, GSA; the Assistant to the President for National Security Affairs; the

⁴The reimbursable program provides security funding through payments made by agencies assigned space in GSA-owned or -leased buildings.

Director, Security Policy Board.⁵ The executive order specified that the GSA Administrator or his designee was to chair the committee. The President reserved the right to appoint other federal employees to the committee. FPS was designated to provide administrative services, funds, facilities, staff, and other support services for ISC to the extent permitted by law and subject to the availability of appropriations. Also subject to these provisions, other executive departments and agencies were charged with helping to support ISC.

ISC was established to enhance the quality and effectiveness of security in and protection of buildings and facilities in the United States that are occupied by federal employees for nonmilitary activities, and to provide a permanent body to address continuing governmentwide security for federal facilities. ISC's responsibilities are to:

- establish policies for security in and protection of federal facilities;
- develop and evaluate security standards for federal facilities, develop a strategy for ensuring compliance with such standards, and oversee the implementation of appropriate security measures in federal facilities; and
- take such actions as may be necessary to enhance the quality and effectiveness of security and protection of federal facilities, including but not limited to:
 - encouraging agencies with security responsibilities to share security-related intelligence in a timely and cooperative manner;
 - assessing technology and information systems as a means of providing cost-effective improvements to security in federal facilities;
 - developing long-term construction standards for those locations with threat levels or missions that require blast-resistant structures or other specialized security requirements;
 - evaluating standards for the location of, and special security related to, day care centers in federal facilities; and
 - assisting the GSA Administrator in developing and maintaining a centralized security database of all federal facilities.

The order also directs the GSA Administrator, through FPS, to be responsible for monitoring federal agencies' compliance with ISC's policies and recommendations.

⁵Appendix I contains a list of all ISC members. The Security Policy Board no longer exists.

ISC Has Made Limited Progress Implementing Its Responsibilities

ISC has carried out some elements of its responsibilities, but it has made little progress on several other responsibilities given to it by the executive order. ISC has issued two formal products. The first, *ISC Security Design Criteria for New Federal Office Buildings and Major Modernization Projects* (ISC Security Design Criteria), was issued in May 2001. This document contains physical security–design and construction criteria and standards for federal buildings. The second product, issued in July 2001, is *Minimum Standards for Federal Building Access Procedures*. In 1997 ISC disseminated information on entry security technology for buildings with high security designations to member agencies for their consideration and implementation, if applicable; and it developed a draft report on preparedness for nuclear, biological, and chemical events. ISC also has been a forum for federal agencies to discuss security-related issues and share information and ideas. However, for a number of reasons, it has not accomplished several elements of its responsibilities. ISC has no governmentwide data on the extent to which it has enhanced the quality and effectiveness of federal facility security since its inception, although this was one of its major objectives. Consequently, several ISC participants believe it has not been very effective or has not lived up to its potential.

ISC records show that ISC established 13 working groups between December 1995 and April 2002, but 11 of 13 working groups were inactive in July 2002. At its initial meeting in December 1995, 9 working groups were established within ISC. Eight of these working groups addressed the various responsibilities identified in Executive Order 12977; the ninth group was to focus on funding issues.⁶ In 1996, an existing working group was split into 2 groups; the new working group was called “information systems and centralized database,” and it became the tenth working group. A new working group, the eleventh, was also formed to focus on protective forces at federal facilities. Further, as the result of congressional testimony we delivered on security breaches,⁷ the twelfth working group was established in 2000 to develop guidelines to improve

⁶Although funding was not listed specifically as a responsibility, the executive order did not limit ISC to just those responsibilities identified in the executive order.

⁷U.S. General Accounting Office, *Security: Breaches at Federal Agencies and Airports*, [GAO/T-OSI-00-10](#) (Washington, D.C.: May 25, 2000).

building access procedures.⁸ Finally, in April 2002, ISC established its thirteenth working group to focus on the security of leased space.

Table 1 shows the areas of responsibility, the working groups established, and products drafted or issued in each area. As the table indicates, two products were issued by ISC and two draft products, one addressing entry security technology and the other preparedness for nuclear, biological, and chemical events, were not officially issued by ISC. However, ISC disseminated the product on entry security to participating agencies for implementation, if appropriate. GSA's ISC records do not indicate what happened to the other product.

⁸There may have been other working groups formed. However, ISC's records do not show evidence of any.

Table 1: ISC Products and Working Groups, in Relation to Its Responsibilities

Responsibility	Name of working group, status, and products drafted or Issued
Establish policies for security in and protection of federal facilities.	No information in ISC records.
Develop and evaluate security standards for federal facilities, develop a strategy for ensuring compliance with such standards, and oversee the implementation of appropriate security measures in federal facilities.	Five working groups established: (1) Security Standards for Federal Facilities, established in 1995. No records of products issued; working group inactive in July 2002. (2) Oversee Implementation of Security Measures, established in 1995; no record of products issued by ISC; working group inactive in July 2002. (3) Protective Forces at Federal Facilities, established 1996; no record of products issued by ISC; working group inactive in July 2002. (4) Working group formed in June 2000 to address improving building access procedures. Issued <i>Minimum Standards for Federal Building Access Procedures</i> in 2001; working group inactive in July 2002. (5) Working group formed April 2002 to address security of leased space; working group active.
Take such actions as may be necessary to enhance the quality and effectiveness of security and protection of federal facilities, including but not limited to:	
encouraging agencies with security responsibilities to share security-related intelligence in a timely and cooperative manner;	Working group established 1995: Responsibility of Sharing Security Related Intelligence; no record of products issued by ISC; working group inactive in July 2002.
assessing technology and information systems as a means of providing cost-effective improvements to security in federal facilities;	Working group established 1995: Technology and Information Systems for Security Improvements and Centralized Data Base; made recommendations on entry security technology and on preparedness for nuclear, biological, and chemical events in 1997; working group inactive in July 2002.
developing long-term construction standards for those locations with threat levels or missions that require blast-resistant structures or other specialized security requirements;	Three working groups established in 1995: (1) Long-Term Construction Standards, issued <i>ISC Security Design Criteria for New Federal Office Buildings and Major Modernization Projects</i> in May 2001; working group still active. (2) Court Security Issues: no record of products issued by ISC; working group inactive in July 2002. (3) Specialty/ Unique Facilities: no record of products issued by ISC; working group inactive in July 2002.
evaluating standards for the location of, and special security related to, day care centers in federal facilities;	Working group established 1995: People Issues (child care, agency collocation); no record of products issued by ISC; working group inactive in July 2002.
assisting the Administrator in developing and maintaining a centralized security database of all federal facilities;	Working group established 1996: Information Systems and Centralized Data Base (separated from Technology and Information Systems for Security Improvements); no record of products issued by ISC; working group inactive in July 2002.
funding.	Working group established 1995: Funding Issues; no record of products issued by ISC; working group inactive in July 2002.

Note: We have assigned the working groups to responsibilities based on descriptions given about the working group in ISC records and the name of the working group or its product. ISC records do not identify which working group was formed to meet which responsibility.

Source: ISC documents and minutes of meetings and discussions with agency personnel involved with ISC.

ISC members and participating agencies have identified various strengths and weaknesses with the way in which ISC is structured and has operated. As examples of ISC's strengths, several representatives from agencies that

attend ISC meetings identified the coordination, communication, and sharing of information among agencies on security issues; the ability to bring together diverse security and related expertise to address problems; and the ability to interface with the private sector.

The reported weaknesses could help explain why ISC has made limited progress toward meeting some of the responsibilities given to it by the executive order. Agency representatives identified several weaknesses, including a lack of consistent and aggressive leadership by GSA and inadequate staff support and funding, that they said have limited ISC's effectiveness. GSA's lack of aggressive leadership and support were illustrated by the following:

- No charter or operating procedures been issued. The ISC perceived the need for a charter and operating procedures, and ISC meeting minutes in 1997 indicated that a charter was ready for the GSA Administrator's signature and that GSA would draft standard operating procedures to implement the charter. Nevertheless, we found no record of an approved charter or any operating procedures. Several ISC participants expressed concerns about ISC's decisionmaking. These concerns included their perception of ISC's difficulty in making decisions, the lack of agreed-upon policies and procedures on voting and decisionmaking, and the limited amount of influence given to smaller agencies as compared with the larger ones.
- Although ISC has met 14 times since its inception in 1995, no meetings were held for an approximately 18 month period, from November 1998 to June 2000.⁹
- GSA assigned one FPS staff member to support ISC for the past several years, and this individual supported ISC only on a part-time basis, in addition to his other duties. According to this individual, ISC had no independent funding. According to a former GSA official involved with ISC, the lack of sufficient staff support and budget have adversely affected ISC's success.
- Some ISC representatives point to the long time it took GSA to issue security design criteria as an example of GSA's lack of leadership and support. Although the design criteria were unanimously approved by ISC

⁹Thirteen of these were regular ISC meetings. The other meeting was a conference among ISC, GSA, and the members of the American Institute of Architects in December 2001. There are no minutes of the June 2000 meeting, but a June meeting (no year stated) is mentioned in the December 2000 ISC minutes. We included a June 2000 meeting in our count.

(including GSA) in 1998, they were not officially released until May 2001. The former GSA official who delayed issuance of the security design criteria said that although he did not know whether he had the authority to delay issuance, he did so because he believed that the criteria were too prescriptive and would adversely affect GSA's ability to obtain properties. According to this official, GSA also did not establish clear lines of authority within GSA concerning ISC, and did not try hard enough to make ISC work.

- In 1997, ISC agreed to seek full membership for the USPS and the Social Security Administration (SSA). The ISC Chairman agreed to initiate the process of formally accepting these two as new members. Although representatives from the USPS and SSA served on working groups, they could not vote on ISC issues because the executive order creating ISC did not specify these agencies as members. Although a GSA official told us that this issue was discussed with OMB, he said that GSA did not follow through on having the executive order changed to add new members because GSA perceived it as a long, drawn-out process.
- Although ISC issued annual reports for 1996 and 1997 discussing such matters as security enhancements at federal buildings and the status of various ISC working groups, it has not issued annual reports for the years after 1997—limiting information about ISC efforts. Furthermore, we found no evidence that ISC has established performance goals or measures that would enable it to determine the extent to which one of its major objectives—enhancing the quality and effectiveness of federal facility security—has been achieved.
- We found no records, and, when asked, GSA was unable to provide any documents indicating that either GSA or ISC monitored federal agency compliance with ISC's policies and recommendations, even though both had been charged with this responsibility.

More recently, under GSA's leadership, ISC has recognized that its success had been constrained by a number of factors; it has been working to revitalize the committee to meet its responsibilities in light of the September 11, 2001, terrorist attacks. At a December 2001 conference and in a December 2001 follow-up letter, a GSA official stated that GSA is committed to reinvigorating ISC. On April 26 and June 27, 2002, ISC had the first two business meetings in its revitalization effort. At these meetings, ISC identified the need to address general ISC issues, such as a charter, voting protocol, and a new membership process. It also discussed ISC operating procedures and agreed to meet quarterly unless an emergency meeting were needed. GSA announced that it was seeking a full-time staff person to plan and coordinate ISC's efforts.

On the programmatic side, in December 2001, GSA, ISC and the American Institute of Architects participated in a conference entitled Better Security-Better Design. At its April and June 2002 business meetings, ISC established a working group to develop security standards for leased space, and GSA and the State Department agreed to share their alert systems with the other agencies; ISC representatives also discussed a number of topics, such as creating one document that would provide security criteria for new buildings, existing buildings, child care centers, and leased space, and reducing duplication of effort between ISC and other groups in the government looking at security issues.

Implications of the Creation of DHS on ISC

The creation of a DHS would have significant implications for ISC and its responsibilities. While the need for ISC, or an organization like ISC, would likely continue with the creation of a DHS, leadership responsibility for ISC could shift from GSA to DHS, and ISC's responsibilities, role, membership and operation could change.

Concerning ISC's continued existence, the need for an organization like ISC would likely continue for several reasons. The proposed legislation by the President and both houses of Congress calls for DHS's mission to include security for and protection of the nation's critical infrastructure. Over 30 federal agencies have authority to own or acquire real property for which they have security-related responsibilities. Various agencies, such as the Departments of the Treasury (Treasury) and Veterans Affairs (VA), have independent police forces. It would be difficult for DHS to develop and implement policies and standards for the security of federal facilities without the participation and assistance of the federal organizations that own and occupy the facilities, given their large number, their variety, and their dispersion.

The President's DHS proposal as well as the DHS bills being considered in Congress would move FPS from GSA to DHS. With respect to the ISC's leadership, such a move would likely mean that the ISC chairmanship would shift from GSA to DHS if FPS were moved, since GSA would no longer have the security role of FPS. Should this occur, DHS could decide to seek a change in ISC's role, or the law creating DHS could necessitate changes in ISC's role. The President's proposal and S. 2452 did not specifically address whether DHS's security responsibilities for facilities would include more than just buildings that are GSA-owned or -occupied. However, H.R. 5005, as passed by the House of Representatives, provides that the DHS Secretary "shall protect the buildings, grounds and property that are owned, occupied, or secured by the Federal Government

(including any agency, instrumentality, or wholly owned or mixed-ownership corporation thereof) and the persons on the property.”¹⁰ This could include facilities controlled by the Department of Defense (DOD), Congress, and the Judiciary. Thus, if such a provision were included in the legislation that is enacted, DHS would have significantly greater authority and responsibility than GSA currently has for federal property security, and the nature of the relationship between the ISC Chair and ISC member agencies would change. This is because the GSA Administrator currently does not have direct authority or responsibility for security for federal property that GSA does not own or acquire by lease; under H.R. 5005, the DHS secretary would have direct authority and responsibility for security governmentwide. Moreover, the DHS Secretary, in consultation with the GSA Administrator, could issue and enforce policies and standards governmentwide; the GSA Administrator needs the auspices of ISC to do this for buildings not under GSA’s control.

It appears that ISC’s role after DHS is established would depend largely on the role that DHS’s authorizing legislation assigns to DHS for federal facility security, which differs in pending legislation, as well as how DHS would decide to use the ISC or groups similar to ISC. For example, if DHS were given direct overall responsibility for the full range of federal security functions, it would appear that ISC or a similar group would play more of an advisory/information-sharing role. On the other hand, if DHS were directly responsible for security only for GSA-owned and -leased space, then the ISC or a similar group might continue to make decisions for other owned or leased space. In addition, the specific nature of the responsibilities given to DHS would affect the ISC. For example, DHS’s responsibilities for federal facility security could include one or more of the following: policymaking, standard setting, decisionmaking, training, planning, information/intelligence sharing, providing day-to-day security protection, and oversight. The challenge of having DHS be directly responsible for all of these functions for all federal facilities would have to be considered. For those functions given to DHS, it would have to decide which functions it would perform, which ones it might delegate to the organization previously responsible, and which ones would be appropriate for an organization like the ISC. The specific language of the final legislation creating DHS and how it addresses this issue would obviously affect ISC’s future role.

¹⁰Section 2(a) of Section 906

Another possible responsibility ISC could have under a newly established DHS would be to assist DHS in carrying out the initiatives contained in the July 2002 Office of Homeland Security's *National Strategy for Homeland Security* as they relate to critical infrastructure. For example, ISC could assist in performing and maintaining a complete and accurate assessment of the nation's critical federal facilities and related infrastructure and in developing a national infrastructure protection plan for federal facilities. According to the strategy, this would include establishing standards and benchmarks for infrastructure protection and providing a means for measuring performance as related to federal facilities. In addition, the ISC could have a role in assisting DHS to carry out its intelligence-related responsibilities, including the sharing of threat and risk information, as they relate to federal facilities.

Still another responsibility that could be considered for ISC is the security protection that is provided to executive branch officials. In July 2000, we reported that responsibility for this was divided among many agencies, and no single agency or official was responsible for handling issues related to the routine protection of these officials.¹¹ We said that from fiscal years 1997 through 1999, agencies reported that personnel from 27 different agencies protected officials holding 42 executive branch positions in 31 executive branch agencies. The problems we found included lack of specific statutory authority to provide protection, lack of standardized threat assessments and training, and lack of a federal organization responsible for overseeing this function on a governmentwide basis. We recommended that the OMB Director, in consultation with the President, designate an official or group to assess issues related to security protection for executive branch officials. In early 2002, an OMB representative told us that OMB had not yet acted on our recommendation and that the Office of Homeland Security (OHS) might be the appropriate organization to handle this issue. Thus, this could also be an appropriate responsibility for DHS and ISC.

After ISC's future role and responsibilities are determined, such issues as membership, operating procedures, and funding and support needs would have to be assessed. These could entail looking at the factors and issues that we and the agency representatives had identified as contributing to

¹¹U.S. General Accounting Office, *Security Protection: Standardization Issues Regarding Protection of Executive Branch Officials*, [GAO/GGD/OSI-00-139](#) (Washington, D.C.: July 11, 2000).

limited progress by ISC as it has existed prior to DHS, to see whether the actions initiated by GSA addressed them sufficiently or needed to be modified or enhanced. These include ISC's charter, operating procedures, decisionmaking process, membership, meeting schedule, funding and support, and performance goals and measures. For example, if DHS becomes responsible for all the facilities provided in H.R. 5005, it may be appropriate to add other organizations besides the USPS and SSA to ISC, including government corporations. For another example, GSA has said that it was seeking a full-time staff member to support ISC. DHS would have to determine whether one person would be sufficient to meet DHS's objectives and schedule for ISC.

Another important responsibility that would have to be considered is integration between security and the facility management functions. Under DHS proposals, DHS would be responsible for property security, but GSA and other agencies with authority to own or acquire space would retain their responsibilities for such functions as choosing facility locations and building design and operation. In addition, agencies will still have to ensure that each property adequately and effectively supports the mission of the occupying agency or other government entity and that any security systems, procedures, or devices implemented at a facility do not materially hamper the ability of the entity to carry out its mission effectively.

We and a GSA official have both testified that security is a key facilities management function: security needs to be integrated into decisions about location, design and operation of federal facilities.¹² Further, in testifying on a proposal to make FPS a separate service within GSA, GSA stated that such an action would divorce security from other federal facility functions. According to GSA, separating FPS from PBS would create an organizational barrier between protection experts and the PBS asset managers, planners, and other staff who set PBS budgets and policies for GSA's building inventory. GSA said that FPS's budget, personnel actions, and operational focus have been centralized to yield results that are better than if FPS were separate. Additional concerns were raised about security and the facilities management function in a November 1999 Symposium on

¹²U.S. General Accounting Office, *Homeland Security: Proposal for Cabinet Agency Has Merit, but Implementation Will be Pivotal to Success*, [GAO-02-886T](#) (Washington, D.C.: June 25, 2002). Statement of F. Joseph Moravec, Commissioner of the Public Buildings Service, U.S. General Services Administration before the Subcommittee on Technology and Procurement Policy, Committee on Government Reform, U.S. House of Representatives (November 1, 2001).

Security and the Design of Public Buildings, which was jointly sponsored by GSA and the Department of State (DOS) in cooperation with the American Institute of Architects. Presenters concluded that public building design processes must find innovative ways to improve security and protect American values without creating a fortress image. Thus, if DHS becomes responsible for the security of federal facilities, DHS would likely not only need a mechanism like ISC to work with GSA and other federal entities on security-related matters; it would also need a way to ensure that building security and other facility management functions are integrated. An organization like ISC that comprises the affected entities could serve to promote such integration.

Finally, in commenting on a draft of this report, DOS's Senior Advisor in DOS's Office of Diplomatic Security raised another issue he believed would be relevant for DHS's creation. This issue related to the existing delegations of authority from GSA to various agencies that enable them to provide their own facility protection. He believes that these delegations are important elements of the government's efforts to protect its facilities that ISC and DHS need to consider.

Conclusions

Although ISC has carried out some of its responsibilities, it has made little progress on others, and several participants believe that its progress has been limited. Agency officials and ISC participants identified factors and issues in areas such as membership, leadership, charter, operating procedures, decisionmaking processes, meeting frequency, and staffing and funding support that they believe have limited ISC's progress. We also noted that ISC lacks performance goals and measures. GSA has acknowledged the lack of consistent and aggressive leadership by GSA, inadequate staff support and funding for the ISC, and ISC's difficulty in making decisions and has initiated efforts to address them. However, it is too early to tell whether these efforts will be sufficient.

With the potential creation of a DHS, the need for ISC, or an organization like ISC, would likely continue. The creation of DHS would have significant implications for ISC and its responsibilities. ISC's leadership, responsibilities, role, membership, and operation could change. To deal with these possible changes, the factors and issues that affected ISC's progress prior to the creation of DHS should be considered, including the extent to which GSA has addressed these issues. DHS's creation and assignment of responsibility for federal facility security would also necessitate the need to consider how best to integrate facility security and the other facility management functions. Further, DHS's creation would

raise the issue whether DHS and ISC should be given responsibility for security protection for executive branch officials. Finally, how Congress ultimately decides upon DHS's role for federal facility security in any legislation to create DHS would have significant implications for ISC, DHS, and other federal agencies.

Recommendations for Executive Action

In the short term, we recommend that the Administrator of GSA work with ISC to ensure that actions are effectively implemented to correct the problems identified with ISC in this report. Furthermore, given that OMB is a current member of ISC and has been given responsibility for heading the government's efforts to help establish DHS,¹³ we recommend that the Director of OMB work with DHS, GSA, and other appropriate entities to ensure that the issues our review has identified are addressed by the appropriate agency or agencies that will have the responsibility of overseeing the protection of federal facilities and executive branch officials.

Matter for Congressional Consideration

As Congress continues its deliberations on proposed legislation creating DHS, it may want to clarify DHS's jurisdiction with respect to the federal organizations under its purview and the specific security-related functions for which it is responsible. Federal organizations under DHS's jurisdiction could range from, exclusively, the federal buildings now under GSA's control to all facilities owned, occupied, or secured by the federal government. Limiting DHS's jurisdiction to exclusively GSA-controlled properties would leave out many nonmilitary facilities, while extending it to all property owned or occupied by the federal government would be an enormous undertaking. The functions for which DHS could assume responsibility could include policy and standard setting, training, information and intelligence sharing, planning and oversight, and the actual provision of security services. In deciding which security-related functions DHS should be responsible for providing, two factors for Congress to consider are the need for integrating the security function with the day-to-day management of the facility and the challenge that would be associated with providing day-to-day security for all federally owned, occupied, or secured facilities.

¹³Executive Order 13267 assigns OMB the responsibility of establishing a Transition Planning Office for the Department of Homeland Security.

Scope and Methodology

To achieve our objective of determining whether ISC had fulfilled the duties and responsibilities established by the executive order, we reviewed Executive Order 12977, the minutes of ISC meetings, and available products developed by ISC. We also interviewed 17 of 21 members and participating nonmembers of ISC; FPS officials; and both current and former GSA officials. Further, we attended the December 2001 and the April and June 2002 ISC meetings. We did not interview the Central Intelligence Agency's officials, because the agency declined to participate in our assignment. Also, we did not interview the Assistant to the President for National Security Affairs because, being new to the position, this person had limited knowledge of ISC and its past efforts. Further, our report does not reflect any comments from OMB about ISC's current or past operations, because an OMB official said that OMB had not attended meetings in the past several years and did not have time-relevant information to provide us on these matters. We did not interview the Director of the Security Policy Board because it has been abolished. Further, responses from several agencies were limited by the fact that ISC representatives were new or had not attended meetings in several years. Our review of ISC accomplishments was constrained by the lack of detailed ISC records after 1997 and by the turnover of agency personnel who participated in ISC activities. Thus, our reporting of accomplishments was based on available ISC records and the recollections of those persons whom we interviewed who had varying lengths of experience with ISC.

To determine the implications of the creation of DHS on ISC, we reviewed the President's proposal to create DHS, proposed legislation that would create DHS, the OHS's July 2002 National Strategy, Executive Order 13267, and our July 2001 report on security protection for executive branch officials. We also discussed this issue with representatives from OMB, GSA, and OHS.

We conducted our review of ISC between December 2001 and July 2002 in accordance with generally accepted government auditing standards. We received written responses from 3 agencies; oral or E-mail comments from 14 agencies; and 4 agencies did not respond. The comments are discussed in the following section.

Agency Comments

We requested comments on a draft of this report from the OMB Director, the Administrator of GSA, OHS's General Counsel, and ISC agencies participating in our review. We received written responses on our draft report from the Departments of Health and Human Services (HHS) and Housing and Urban Development (HUD), and from SSA. HHS had no

comments. HUD and SSA generally agreed with the report's conclusions and recommendations. We received oral or E-mail responses on our draft report from GSA; the Administrative Office of the United States Courts (AOUSC); DOD; DOJ; DOS; Treasury; VA; the Departments of Education (Education), Energy (DOE), Labor (DOL), Transportation (DOT), and Agriculture (USDA); OMB; and USPS. GSA, DOE, DOL, USDA, USPS, and VA concurred with the information in our report. AOUSC, Education, DOD, DOJ, DOT, and Treasury had no comments. OMB agreed with our recommendation and suggested technical changes that we have made. DOS raised several issues, which we discuss below. The DOC, Interior, EPA, and OHS did not provide comments on the report.

GSA's Commissioner of the Public Buildings Service said that he concurred with our recommendation and our view that a full resolution of the ISC issues we identified depended on the mission and authorities given to DHS. He also said that GSA would seek ISC member comments on our report at its next meeting and would consult with OMB officials and the DHS transition planning office to address the future role of the ISC within the context of DHS.

SSA's Commissioner raised two issues that SSA believes the ISC needs to consider. These are the role of the federal facilities building security committees and the need to integrate the term "force protection" into the ISC charter and operating procedures. While these issues may be reasonable for ISC to consider, we did not address them in our review and are not in a position to discuss them definitively. (See app. V.)

DOS's Senior Advisor in the Office of Diplomatic Security raised a question about our discussion that the ISC assume some role in security protection of executive branch officials, considering the ISC's responsibility for facility security. Our discussion on this issue related to both DHS and ISC. If DHS is created, a role in the protection of executive branch officials may be appropriate. He also suggested that we provide the basis for this discussion in this report. The basis is discussed in our report and relates to work we have previously reported on in a separate review. He also expressed concern about the lack of reference in our report to GSA's delegation of authority to various agencies, to enable them to provide their own facility protection. Although our report pointed out these delegations, we have modified it to reflect his concern. He also recommended a technical change, which we have made.

DOS's Director of the Office of Domestic Operations said that offices responsible for safety and security often have opposing views and that, in

his opinion, any mechanism established to integrate security into federal facilities should include safety offices. We did not address this issue in our review and are therefore not in a position to comment on it. He also pointed out the there are other entities currently working on federal facility security issues, such as the Physical Security Working Group and the Protective Forces Working Group, which should be included under the DHS or ISC umbrella or should have a specific separate mandate. While we did not address the roles of these two groups, this appears to be a reasonable issue for DHS or ISC to address.

As agreed with your office, unless you publicly announce the contents of this report, we plan no further distribution until 7 days from the report date. At that time, we will send copies of this letter to the Ranking Minority Member of the Senate Committee on Governmental Affairs, other appropriate congressional committees, the Director of OMB, the Administrator of GSA, OHS, and other interested organizations. We will also make copies available to others upon request. In addition, the report will be available at no charge on the GAO Web site at <http://www.gao.gov>.

Please contact Ron King or me at (202) 512-2834. Major contributors to this report are acknowledged in appendix VI.



Bernard L. Ungar
Director, Physical Infrastructure Issues

Appendix I: Executive Order 12977 of October 19, 1995

The President

Interagency Security Committee

By the authority vested in me as President by the Constitution and the laws of the United States of America, and in order to enhance the quality and effectiveness of security in and protection of buildings and facilities in the United States occupied by Federal employees for nonmilitary activities (“Federal facilities”), and to provide a permanent body to address continuing government-wide security for Federal facilities, it is hereby ordered as follows:

Section 1. *Establishment.* There is hereby established within the executive branch the Interagency Security Committee (“Committee”). The Committee shall consist of: (a) the Administrator of General Services (“Administrator”);

(b) representatives from the following agencies, appointed by the agency heads:

- (1) Department of State;
- (2) Department of the Treasury;
- (3) Department of Defense;
- (4) Department of Justice;
- (5) Department of the Interior;
- (6) Department of Agriculture;
- (7) Department of Commerce;
- (8) Department of Labor;
- (9) Department of Health and Human Services;
- (10) Department of Housing and Urban Development;
- (11) Department of Transportation;
- (12) Department of Energy;
- (13) Department of Education;
- (14) Department of Veterans Affairs;
- (15) Environmental Protection Agency;
- (16) Central Intelligence Agency; and
- (17) Office of Management and Budget;

(c) the following individuals or their designees:

- (1) the Director, United States Marshals Service;
 - (2) the Assistant Commissioner of the Federal Protective Service of the Public Buildings Service, General Services Administration (“Assistant Commissioner”);
 - (3) the Assistant to the President for National Security Affairs; and
 - (4) the Director, Security Policy Board; and
- (d) such other Federal employees as the President shall appoint.

Sec. 2. *Chair.* The Committee shall be chaired by the Administrator, or the designee of the Administrator.

Sec. 3. *Working Groups.* The Committee is authorized to establish

interagency working groups to perform such tasks as may be directed by the Committee.

Sec. 4. Consultation. The Committee may consult with other parties, including the Administrative Office of the United States Courts, to perform its responsibilities under this order, and, at the discretion of the Committee, such other parties may participate in the working groups.

Sec. 5. Duties and Responsibilities. (a) The Committee shall:

(1) establish policies for security in and protection of Federal facilities;
(2) develop and evaluate security standards for Federal facilities, develop a strategy for ensuring compliance with such standards, and oversee the implementation of appropriate security measures in Federal facilities; and
(3) take such actions as may be necessary to enhance the quality and effectiveness of security and protection of Federal facilities, including but not limited to:

(A) encouraging agencies with security responsibilities to share security-related intelligence in a timely and cooperative manner;

(B) assessing technology and information systems as a means of providing cost-effective improvements to security in Federal facilities;

(C) developing long-term construction standards for those locations with threat levels or missions that require blast resistant structures or other specialized security requirements;

(D) evaluating standards for the location of, and special security related to, day care centers in Federal facilities; and

(E) assisting the Administrator in developing and maintaining a centralized security database of all Federal facilities.

Sec. 6. Agency Support and Cooperation. (a) *Administrative Support.* To the extent permitted by law and subject to the availability of appropriations, the Administrator, acting by and through the Assistant Commissioner, shall provide the Committee such administrative services, funds, facilities, staff and other support services as may be necessary for the performance of its functions under this order.

(b) *Cooperation.* Each executive agency and department shall cooperate and comply with the policies and recommendations of the Committee issued pursuant to this order, except where the Director of Central Intelligence determines that compliance would jeopardize intelligence sources and methods. To the extent permitted by law and subject to the availability of appropriations, executive agencies and departments shall provide such support as may be necessary to enable the Committee to perform its duties and responsibilities under this order.

(c) *Compliance.* The Administrator, acting by and through the Assistant Commissioner, shall be responsible for monitoring Federal agency compliance with the policies and recommendations of the Committee.

Sec. 7. Judicial Review. This order is intended only to improve the

internal management of the Federal Government, and is not intended, and should not be construed, to create any right or benefit, substantive or procedural, enforceable at law by a party against the United States, its agencies, its officers, or its employees.

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THE WHITE HOUSE,
October 19, 1995.
[FR Doc. 95-26497
Filed 10-20-95; 2:55 pm]
Billing code 3195-01-P

Appendix II: Federal Executive Branch Entities with Some Level of Independent Authority to Acquire Real Property

This information is from *Facilities Location: Agencies Should Pay More Attention to Cost and Rural Development Act*, [GAO-01-805](#), July 31, 2001.

Agency for International Development
American Battle Monuments Commission
Appalachian Regional Commission
Bonneville Power Administration
Broadcasting Board of Governors
Central Intelligence Agency
Department of Agriculture
Department of Commerce
Department of Defense
Department of Education
Department of Energy
Department of Health and Human Services
Department of Housing and Urban Development
Department of the Interior
Department of Justice
Department of Labor
Department of State
Department of Transportation
Department of the Treasury
Department of Veterans Affairs
Environmental Protection Agency
Federal Emergency Management Agency
General Services Administration
National Aeronautics and Space Administration
National Archives and Record Administration
National Science Foundation
National Transportation Safety Board
Panama Canal Commission
Pennsylvania Avenue Development Corporation
Securities and Exchange Commission
Smithsonian Institution
Tennessee Valley Authority
U.S. Parole Commission
U.S. Postal Service
U.S. Sentencing Commission
U.S. Trade Representative

Appendix III: Definition of Security Levels I through V, from DOJ's Vulnerability Assessment of Federal Facilities

Level I

A level I facility has 10 or fewer federal employees. In addition, the facility likely has 2,500 or less square feet of office space and a low volume of public contact or contact with only a small segment of the population. A typical level I facility is a small storefront-type operation, such as a military recruiting office.

Level II

A level II facility has between 11 and 150 federal employees. In addition, the facility likely has from 2,500 to 80,000 square feet; a moderate volume of public contact; and federal activities that are routine in nature, similar to commercial activities. A typical level II building is the Social Security Administration Office in El Dorado, Colorado.

Level III

A level III facility has between 151 and 450 federal employees. In addition, the facility likely has from 80,000 to 150,000 square feet and a moderate to high volume of public contact. Tenant agencies may include law enforcement agencies, courts and related agencies and functions, and government records and archives. A typical level III building is the Pension building, a multitenant, historical building between 4th and 5th Streets on F Street, N.W., Washington, D.C.

Level IV

A level IV facility has over 450 federal employees. In addition, the facility likely has more than 150,000 square feet; a high volume of public contact; and tenant agencies that may include high-risk law enforcement and intelligence agencies, courts, judicial offices, and highly sensitive government records. A typical level IV building is the Department of Justice Building on Constitution Avenue in Washington, D.C.

Level V

A level V facility is a building such as the Pentagon or CIA Headquarters that contains mission functions critical to national security. A level V facility will be similar to a level IV facility in terms of number of employees and square footage.

Appendix IV: ISC Participant-Identified Strengths and Weaknesses

Table 2 shows the strengths identified by the participating agencies or by their representatives to ISC. Table 3 shows the weaknesses identified by the agencies or by their ISC representatives.

Table 2: ISC Strengths Identified by Participating Agencies or by ISC Agency Representatives

ISC participants' comments

Coordination and cooperation among federal departments, when utilized appropriately.
Provides a forum for discussing issues, networking, and assistance in making agency security determinations.
Provided a forum for exchanging ideas and practices.
Continued support of the Administration and coordination efforts with the new Office of Homeland Security.
A forum for interagency coordination of security requirements.
The broad composition of membership allows meaningful communication among high levels of federal agencies on topics of shared and mutual concern. ISC's activities should result in effective coordination of policy and operational protocol for security in and protection of federal facilities.
Ability to bring a very wide and diverse range of professional expertise together to address security issues that affect the federal government. Ability as a group to interface with and positively affect state and local agencies.
Brings agencies together to work on consensus on security issues.
The group is widely diverse and there is expertise in almost all security arenas. Also, participants are up-to-date on the newest technology. They also interface with the private sector, so there is coordination on security issues. This is particularly important in the area of leased buildings
Something like ISC is needed as a forum to bring up and discuss problems, make recommendations, gather information, and so forth. ISC can reach a lot of people quickly.
ISC has brought governmentwide security community together and provides a forum where security "best practices" can be exchanged, security innovations are presented, and policies are developed. These efforts promote a consistent and uniform approach to how the federal government ensures a secure environment for its employees.
There is potential for this committee to provide a permanent body to address continuing governmentwide security for federal facilities. <ul style="list-style-type: none"> • Lessons learned are exchanged by committee members on security experiences within their government agencies. • Potential exists to improve communications and intelligence-sharing with other federal agencies. • Committee brings high-level government professionals together to focus on the security needs of all federal agencies. • This committee attempts to address and meet the requirements of the Executive Order 12977.
Served as a forum for discussing and resolving security issues common to all federal agencies.
Brings all federal agencies together.
Executive Order 12977 provides ISC with the authority and responsibility to develop and issue uniform security policies for implementation by federal agencies.
ISC has representation from throughout the Executive Branch and offers a venue for GSA to offer new security guidelines and recommendations for interagency review and comment. It also initially provided a means for information dissemination immediately following the Oklahoma City bombing of the federal building—a role since taken over by the Federal Bureau of Investigation, to share threat data information.
ISC's strength lies in that it provides an opportunity to harness federal ideas and find reasonable solutions to problems. This has been especially important since Oklahoma City.

Note: Each block represents comments from an ISC participant. However, not all ISC participating agencies are represented in the tables, because one agency did not respond to our questions, one agency said it had no time-relevant data with which to answer our questions, one agency had a new ISC representative who did not comment on strengths and weaknesses, one agency had no positive comments, and two agencies did not comment on the weaknesses.

Source: Oral and written comments received from agencies and their ISC representatives.

Table 3: ISC Weaknesses Identified by Participating Agencies or by ISC Agency Representatives

ISC participants' comments

Time involved in finalizing and approving procedures voted on by member agencies. For example, it took approximately 2 years from approval to implementation of ISC Design Criteria. Also, needs to be looking at a much more comprehensive risk management approach recommended by GAO. It worked much too slowly and not a lot of effort was put into accomplishing the mission from its leadership (GSA).

It is difficult for ISC to reach consensus, and it has no enforcement mechanism.

The meetings were not worth going to. GSA would come and give agencies directions to do things that were not in the executive order and that GSA did not have the authority or funds to implement.

ISC is not going anyplace, the way it is now. The group went a long time without meeting at all. GSA should not control ISC.

The lack of constant and close coordination with departments' and agencies' security officials on a variety of physical security and related issues.

Being inconsistent. Having to face the real possibility that there are other federally sponsored committees or work groups that are attempting to accomplish the same goals and objectives.

Lack of dedicated staff to support committee activities.

ISC had not addressed federally leased facilities. However, at its conference in early December this issue was raised. ISC has put this on this year's (2002) agenda.

Despite many candid discussions about security needs and enhancements, no definitive conclusions have yet been reached concerning effective and practical long-term security responses.

ISC held great promise but it never achieved that and it is hard to say why it never did. There is "no rhyme or reason" to ISC meetings. At six ISC meetings over the past 18 months, six different people opened the meeting. ISC went off on tangents not beneficial to an agency. Certain agencies dominate ISC in that they control ISC. One agency said agencies should have such and such in its facilities for security purposes. Others said this level of security is not necessary for many of its facilities, and that budget issues are being totally disregarded. The smaller agencies do not have the level of funding of the bigger agencies. Someone in GSA needs to pull the reins in and be forceful in listening to everyone, not just the larger agencies, so that other voices will be heard. Certain agencies have said you can vote how you want on something, but we will not support it if it does not adhere to what we want. For the law enforcement procedures first draft, one agency said that if one clause were not changed, it would not support it, even though the straw vote was overwhelmingly in support of the procedures. As a result, the general feeling is that you need to get the support of the main players to get anything through. With the design criteria ISC had no real say, as GSA still had to approve it. ISC was never given policy authority, as GSA kept it. There is no mechanism within ISC to make policy. GSA sat on the agreement for months before the design criteria came out.

ISC was ineffective and produced no results in 3-4 years. The ISC has not been very productive. There is little representation on the part of law enforcement. There are too many agencies on the ISC to ever reach consensus.

ISC goals and objectives are not published in the Code of Federal Regulations (CFR).

- No White House staff involvement.
- Leadership was not clarified to ensure that executive order requirements are met.
- There is no budget available.
- ISC did not meet on a regular basis or have a way to integrate the security guidelines into all federal agency security programs.
- There was not a follow-up program to determine whether the requirements of Executive Order 12977 were being met.

The primary weakness has been with the leadership structure. The Chair objected to the methodology and process for decisionmaking and became frustrated by the inability to take positive action. This resulted in a lack of participation. This problem was voiced to the new GSA leadership, and it appears that changes are underway.

ISC has been ineffective, due in large part to a lack of direction and resources. It did not move aggressively in developing policies or getting policies promulgated. We also believe that ISC policies should be issued under the authority of the President's National Security Council, which was the means used to issue policies developed by the former Security Policy Board.

ISC meets only about four times a year. Implementation of security improvements is dependent upon individual GSA-run building security committees to reach consensus that is not always obtainable. These same committees report the status of their compliance with security enhancements per the Department of Justice's Vulnerability Assessment of Federal Facilities; yet the information is not agency/department-specific.

**Appendix IV: ISC Participant-Identified
Strengths and Weaknesses**

ISC participants' comments

ISC lacked leadership. GSA was unable or unwilling to take a positive leadership role. The biggest stumbling block was GSA's previous leadership. The bottom line was that ISC is not productive. The State Department and the Marshals Service have expressed concern over the lack of progress.

Note: Each block represents comments from an ISC participant. However, not all ISC participating agencies are represented in the tables, because one agency did not respond to our questions, one agency said it had no time-relevant data with which to answer our questions, one agency had a new ISC representative who did not comment on strengths and weaknesses, one agency had no positive comments, and two agencies did not comment on the weaknesses.

Source: Oral and written comments received from agencies and their ISC representatives.

Appendix V: Comments from the Social Security Administration



SOCIAL SECURITY

The Commissioner

August 29, 2002

Mr. Bernard L. Ungar
Director, Physical Infrastructure Issues
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Ungar:

Thank you for the opportunity to review and comment on the draft report, "Building Security: Interagency Security Committee Has Had Limited Success in Fulfilling Its Responsibilities" (GAO-02-1004). Our comments on the report are enclosed. If you have any questions, please have your staff contact Trudy Williams at (410) 965-0380.

Sincerely,



Jo Anne B. Barnhart

Enclosure

SOCIAL SECURITY ADMINISTRATION BALTIMORE MD 21235-0001

COMMENTS OF THE SOCIAL SECURITY ADMINISTRATION (SSA) ON THE
GENERAL ACCOUNTING OFFICE (GAO) DRAFT REPORT, "BUILDING
SECURITY: INTERAGENCY SECURITY COMMITTEE HAS HAD LIMITED
SUCCESS IN FULFILLING ITS RESPONSIBILITIES" (GAO-02-1004)

Recommendation 1

GAO recommends that the Administrator of the General Services Administration (GSA) work with the Interagency Security Committee (ISC) to ensure that actions are effectively implemented to correct the problems identified with ISC in the report. Furthermore, given that Office of Management and Budget (OMB) is a current member of ISC and has been given responsibility for heading the Government's efforts to help establish the Department of Homeland Security (DHS), OMB appears to be the appropriate agency to work with DHS, GSA, and other appropriate entities to address the issues GAO's review has identified. As part of its transition efforts to help establish the proposed DHS, GAO recommends that the Director of OMB work with the Administrator of GSA and other relevant Federal officials: to determine the appropriate leadership, responsibilities, and the role for ISC, or its successor; to take the steps necessary to see that ISC, or its successor, has an appropriate charter, operating procedures, membership, and decision-making process, meeting schedule, staffing and funding support, and performance goals and measures; and to provide for the integration of security with other facility management functions. GAO also recommends that the Director of OMB, consistent with relevant legislation, determine whether DHS and ISC, or its successor, are the appropriate entities to oversee the security protection of executive branch officials and, if so, see that this responsibility is clearly assigned and effectively implemented.

Comment

We agree with GAO's recommendations. The ISC should support the initiatives on the starting points of contact with foreign nationals, with the goal of protecting the nation's borders by assisting the DHS in addressing physical security and critical infrastructure requirements to prevent the entry of terrorists. This must be done while not obstructing the legal, efficient and reliable flow of persons, goods and services on which the economy depends.

Other Comments

We want to highlight the comment on page 11, the second bullet, sentences 1 and 2, that states, "In 1997, ISC agreed to seek full membership for the U.S. Postal Service and the Social Security Administration (SSA)—two large federal organizations. The ISC Chairman agreed to initiate the process of formally accepting these two as new members." To date, we are still pursuing full membership in the ISC.

There is no reference in this report concerning the role the Federal Facilities Building Security Committees should play in the process as stated in the Department of Justice Vulnerability Assessment of Federal Facilities, June 28, 1995: Page 4-3, (4.2.2).

2

This report has not addressed the need to integrate the term "Force Protection" into the ISC charter and operating procedures. The DHS and the ISC must network, coordinate and train. Furthermore, they must understand the Department of Defense initiatives and the roles of Emergency and First Responder Teams and local authorities in supporting the Homeland Security objectives, Congressional Bills and the Presidential agendas.

Appendix VI: Major Contributors

Major contributors to this report include Ron King, Tom Keightley, Lisa Wright-Solomon, John Vocino, Shirley Bates, and Michael Yacura.

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