

# **FIREARMS MANAGEMENT**

An assessment of firearms inventory and control for Department of the Interior law enforcement programs









# United States Department of the Interior

## OFFICE OF INSPECTOR GENERAL Washington, DC 20240

SEP 2 5 2009

#### Memorandum

To:

Secretary Salazar

From:

Mary L. Kendall Way Herdall
Acting Inspector General

Subject:

Assessment Report on Firearms Management by Department of the Interior Law

**Enforcement Agencies** 

This memorandum transmits our report detailing the results of our assessment of firearms inventory and control for Department of the Interior law enforcement programs.

To provide background, beginning in 2001, the Office of Inspector General (OIG) has devoted special attention to Departmental law enforcement programs. In 2002, the OIG released a report detailing significant need for reform of the law enforcement programs and a critical need to establish a centralized office directly report to the Office of the Secretary. As a result of the report, the Secretary of the Interior issued a directive to implement changes within the law enforcement programs throughout the Department.

Since 2002, the OIG has reported on law enforcement and security issues including the following: National Park Service protection of Icon Parks, conditions at Indian Country detention centers, security at Bureau of Reclamation dams, the special agent program of the U.S. Fish and Wildlife Service, and U.S. Park Police management and operations. Overall, the organizational management and effectiveness of Departmental law enforcement programs have significantly improved since our 2002 report. There is now a centralized Office of Law Enforcement and Security reporting to the Office of the Secretary through a Deputy Assistant Secretary. In addition, and with limited exception, each law enforcement program is now led by a Senior Executive manager who has direct access to the bureau directors. These changes have provided the desired increased managerial oversight capacity for the law enforcement programs.

The OIG continues to review Departmental law enforcement and security programs and operations considering them to be high risk programs. Recently, we completed an assessment of the management of firearms under control of the law enforcement programs.

Despite the increased managerial oversight mentioned above, we still found numerous programmatic failures, and deficient internal controls regarding the security of firearms. As a result, we question the ability of the bureaus to accurately account for firearms under their control. In addition, we were surprised to find that the Department has no standards for the

physical security of law enforcement firearms stored in weapon caches across the nation. We also noted several occurrences where law enforcement managers appeared to have little or no appreciation of the need to have accurate accounting of Departmental firearms.

Our report contains 10 recommendations, which, if implemented, should correct deficiencies in firearms management and improve firearms accountability throughout the Department. We would appreciate being kept apprised of the actions the Department takes on our recommendations as we will track the status of their implementation. Please forward a written response to this office within 90 days, identifying plans to address the findings and recommendations cited in this report.

If you have any questions about this report, please do not hesitate to contact me at (202) 208-5745 or your staff may contact my Deputy Assistant Inspector General for Investigations, Scott Culver, at (202) 208-6945.

#### Attachment

cc: Deputy Secretary

Assistant Secretary Fish and Wildlife and Parks Assistant Secretary for Policy, Management and Budget Assistant Secretary for Indian Affairs

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## Introduction

The loss of firearms by federal law enforcement agencies poses serious risks to the public, including the risks that missing firearms may be used to inflict bodily harm or to further criminal activity. In 2003, the General Accounting Office, now known as the Government Accountability Office (GAO), reported the National Park Service was missing, lost, or had 133 firearms stolen from them.¹ Five years later, two of those firearms were discovered in a Georgia pawn shop. An Office of Inspector General (OIG) for the Department of the Interior (DOI) investigation revealed that a retired commissioned law enforcement manager had taken advantage of weak internal accountability measures and stole the weapons prior to retiring. Both he and his son later pawned those firearms for cash.

In another case, a senior U.S. Fish and Wildlife Service (FWS) law enforcement official failed to return his service weapons after his retirement in February 2004. We discovered that these firearms were missing during our 2006 assessment of the FWS special agent program. The firearms were subsequently returned to FWS only after OIG agents questioned the former official about the missing weapons.

The Department has eight law enforcement programs with over 4,000 commissioned personnel working to protect natural resources, national icons and monuments, millions of visitors, and over 67,000 employees. All Department law enforcement programs store firearms in reserve for future operational needs. These caches, generally consisting of handguns, shotguns, and rifles, are located at various sites across the country. The number of firearms stored in these caches depends on the function of the location. We found that programs with armories at the Federal Law Enforcement Training Center (FLETC) in Glynco, GA, store hundreds of firearms in their respective caches. In contrast, we found caches containing as few as nine.

<sup>&</sup>lt;sup>1</sup> GAO-03-688 Firearms Control: Federal Agencies Have Firearms Controls, but Could Strengthen Controls in Key Areas.

Law enforcement firearms are expected to be properly inventoried and securely guarded. The objective of our assessment was to determine if adequate measures exist to ensure the accountability of firearms managed by Department law enforcement entities. We reviewed and evaluated hundreds of documents related to firearms accountability, including Department and bureau policies and procedures and inventory records. We conducted over 50 interviews of law enforcement personnel and support staff. We visited 26 sites representative of Department and bureau law enforcement programs where cached weapons are being stored. Lastly, we inspected 1,334 firearms stored at those locations to determine their level of security and if they were properly inventoried.

This report presents the results of our assessment and is part of ongoing efforts by the OIG to examine Departmental law enforcement programs and homeland security issues.

#### **RESULTS IN BRIEF**

All bureaus have policies and procedures designed to control and safeguard property that are generally consistent with Department standards and other federal regulations. Despite these policies and procedures, we found that most DOI law enforcement programs could not accurately account for their cached firearms. Inventories were found to be inaccurate and those responsible for firearms accountability did not always follow established procedures for conducting periodic inventories or reporting and investigating missing firearms. We found 373 inventory discrepancies out of the 1,334 firearms we physically handled. These discrepancies include: firearms listed on inventories but not present; firearms present, but not listed on inventories; and administrative errors such as lost and unprocessed paperwork or transposition errors. Consequently, the Department cannot accurately account for the number of law enforcement firearms it has or where those firearms are actually located.

Fifty percent of the law enforcement personnel entrusted with maintaining firearms caches had no property management or inventory training. The Department has no requirement that firearms property custodians receive such training. Most of those individuals obtained familiarization on their own volition or from information passed down from their predecessors.

Acquisition and disposal of firearms vary depending on a bureau's operations and structure. Some bureaus manage the acquisition and disposal process nationally from a central location; others leave these activities for regional or local offices.

The Department has no standards for the physical security of firearms caches. Although all firearms caches we observed were secured under some type of access control, the degree of physical security varies greatly among bureaus and intra-bureau locations. Some bureaus have installed multi-layered security systems as control measures; others have minimal controls leaving them vulnerable to theft.

#### **ACCOUNTABILITY**

In 1986, the Department issued its Interior Property Management Directives (IPMD) to comply with requirements in Title 31 of the U.S. Code, dealing with agency accounting and financial management. The Office of Management and Budget published Circular A-123 in 1995 requiring federal agencies to: (1) establish a management control system that provides reasonable assurance that assets are safeguarded against waste, loss, unauthorized use, and misappropriation; and (2) ensure that transactions are promptly recorded, properly classified, and accounted for in order to prepare timely accounts and reliable financial and other reports.<sup>2</sup>

REGULATIONS AND
DIRECTIVES
GOVERNING
FIREARMS
ACCOUNTABILITY

The IPMD classifies firearms as sensitive property along with museum property and requires an annual physical inventory of such property. The IPMD does not further define firearms as dangerous property or include firearms in its definition of hazardous materials, which it refers to as items that "may cause or significantly contribute to an increase in mortality" or "pose a substantial present or potential hazard to human health."

The Department has generally recognized the sensitivity of managing firearms programs through its Personal Property Management Review Guideline published in November 2007. That document specifically requires firearms accountability be reviewed as part of the Property Management Internal Control Review process.

While we found extensive Departmental regulation on the management and accountability of museum property, no similar specific guidance exists at the same level for the accountability of law enforcement firearms. One Department property management specialist was concerned with this lack of guidance and said that he "was surprised to hear that there are more controls in place for museum property than there are for firearms."

We found each law enforcement program generally issued and published firearms accountability policies and procedures through

"The proper stewardship of Federal resources is a fundamental responsibility of agency managers and staff."

Federal Managers' Financial Integrity Act of 1982

<sup>&</sup>lt;sup>2</sup> Office of Management and Budget Circular A-123, Management Accountability and Control, Executive Office of the President, June 21, 1995, Revised December 21, 2004.

e-mail distribution to their law enforcement and security officers. Firearms accountability policies and procedures were also published in law enforcement general orders and standard operating procedures. We also learned that bureaus had instituted firearms accountability policies and procedures through their respective property management regulations.

We note that both the Code of Federal Regulations and FWS define firearms as dangerous property in their regulations on reutilization and disposal of personal property.<sup>3</sup>

#### RECOMMENDATION

1. The Department should reclassify firearms from sensitive to dangerous property and establish inventory guidance commensurate to this enhanced classification.

SITE VISITS

We found varying degrees of perspectives and attitudes among firearms custodians about ensuring the accuracy and control of bureau law enforcement firearms inventories. While some displayed significant attention to the accuracy and control of their firearms inventories, others failed to grasp the necessity of properly accounting for their program's firearms. Nearly half the sites we visited were unable to produce an accurate firearms inventory that we could reconcile using the official Departmental property management system. The official inventory lists for these sites did not support the physical inventories of cache weapons we recorded.

We discovered inconsistencies in the diligence paid to firearms inventories at most National Wildlife Refuge System (NWRS) locations we visited. During a review of the NWRS armory at FLETC, where approximately 400 weapons were stored, we found that the NWRS had not conducted an official inventory for over two years. NWRS belatedly conducted an inventory of those weapons in response to our data request. When questioned about the lack of annual inventories, the NWRS official responsible for those firearms said "you're not going to like what I'm about to say" and confessed

<sup>3 41</sup> C.F.R. § 101-42.001; 310 FW 8.

that he has refused to conduct the required inventories because of inaccurate inventory reports he received from NWRS headquarters. We learned that prior to his assignment to FLETC, a paid student intern had been given responsibility for firearms after a past firearms custodian had been relieved of his responsibilities.

When we compared the NWRS armory firearms inventory that was certified on April 2, 2009, to our April 20, 2009 physical inventory of those firearms, we discovered over 100 firearms that were not in the armory as indicated in the official inventory records. We also found several firearms on the inventory were listed as assigned to personnel who had retired in 2004, as well as other firearms that had been assigned to personnel who had resigned and now works for the Department of Homeland Security. Firearms that had been documented elsewhere as destroyed were still listed on current inventories.



Example of FLETC cached firearms.

In response to our observations, the chief of NWRS law enforcement told us that the NWRS armory had a history of poor firearms accountability. He recalled sending a deputy chief to FLETC in 2006 to reconcile the number of firearms stored at the armory, which were last inventoried in 1999. Subsequent to our June 10, 2009 interview,

the chief reported to us that he has assigned a supervisor to continue reconciling NWRS' firearms inventory at FLETC.

Our findings at the U.S. Park Police (USPP) New York Field Office (NYFO) further highlighted our concerns over disconcerting attitudes towards firearms accountability and security. Original property receipts were stored in a plastic bag, abandoned and personal weapons were intermixed with government-owned firearms, and gun safes containing a silenced machine gun and other firearms were unlocked. An unknown number of keys had been issued to the firearms storage area, firearms custodians were unaware of the number of guns in their inventory or their origin, and guns physically present were not listed on the inventory. Three weapons originally purchased in 1993 (two of which were never used), and which are now obsolete, were reported as missing. They were subsequently discovered at the abandoned USPP firearms range during the course of our assessment. USPP could not tell us when those guns were last inventoried or had been physically seen.



Plastic bag containing property receipts for USPP NYFO firearms.

Upon discovering the physical conditions of the NYFO armory and the management of their firearms, we notified the USPP Chief about our observations. The chief subsequently ordered an investigation be conducted regarding the three missing weapons. He also ordered the armory moved to a more appropriate location under new supervision, a complete audit of the firearms property management function, and inventory of all weapons. The deputy chief confirmed that these tasks had been completed.

Not all firearms caches were so haphazardly managed. We found numerous examples of firearms caches which were overseen with due diligence and an elevated respect for the inherent risk in managing dangerous property.

For example, the Bureau of Land Management (BLM) employs a full-time firearms coordinator who manages a cache inventory of over 300 law enforcement firearms at the National Interagency Fire Center in Boise, ID. We found that the firearms coordinator employed sound inventory practices in accounting for his cached weapons. The firearms coordinator is the single point for firearms distribution and has direct contact with BLM property management personnel, enabling him to update firearms inventory records in a timely manner.

FWS has a designated firearms coordinator at FLETC who exhibited similar levels of concern over the accountability of its firearms. Law enforcement firearms were properly inventoried and accounted for at most sites we visited. We were told by the FWS Chief of the Office of Law Enforcement that a concerted effort is being made to designate FLETC as his bureau's sole firearms coordination site.

Although we did not conduct an assessment of National Park Service (NPS) firearms similar to GAO's 2003 study, we found that NPS had properly inventoried and accounted for firearms at most sites we visited. NPS has also designated a full-time firearms coordinator at FLETC who appears to diligently account for and control firearms under her responsibility.

We found that the Bureau of Reclamation (BOR) maintained accurate inventories of its cached firearms at Hoover and Grand Coulee Dams. Each of these locations has comprehensive inventory controls to manage and secure stored firearms.

# MANAGING FIREARMS INVENTORIES

Three law enforcement chiefs told us that they have developed indifference toward the property management system and do not trust the accuracy of its records. The process in current Department property management systems used to account for law enforcement firearms is fraught with inaccuracies incurred through poor system and data control. For the most part, firearms are initially assigned or transferred to law enforcement personnel through the use of Department property management forms. These forms require dated signatures from both parties involved in the transaction. Forms are then processed locally and sent to a regional office where official inventory records are expected to be updated by property management personnel.

The chief of FWS law enforcement commented he had never seen an accurate inventory in his 20 years of service.

We discovered many instances where property management forms involving law enforcement firearms had never been processed or even sent to property management personnel. In some cases, property management forms sent for processing had never been completed years after they had been sent to their respective regional offices. Consequently, it is nearly impossible for the Department, as a whole, to determine where its law enforcement firearms are actually located. Ultimately, inaccuracies and lack of internal controls afford greater opportunities for accountability shortfalls

Additionally, we identified greater firearms accountability issues within NWRS, which does not have a designated firearm coordinator. During our interview with the NWRS Deputy Chief of Training at FLETC, he lamented the need for a designated firearms coordinator. A similar concern was echoed by a senior Bureau of Indian Affairs (BIA) law enforcement manager.

We observed that law enforcement programs that displayed the utmost diligence in cached firearms accountability had implemented secondary systems to manage their law enforcement firearms inventories. These programs also employed full-time firearms coordinators. In addition, these programs verified firearms on occasions other than official yearly inventories to confirm an officer's possession of an assigned firearm. Those programs confirmed the

"...a firearm is treated like a truck or a shovel; there's no difference."

Senior Law Enforcement Official officer's possession of the firearm during semi-annual qualification courses and unannounced inspections.

We note that the Department is in the process of implementing its new Financial and Business Management System (FBMS), which will consolidate the majority of DOI financial management programs into one system. A FBMS senior manager told us this system is capable of allowing an employee to electronically sign for issued personal property thus eliminating paper transactions resulting in more accurate inventory accountability.

## RECOMMENDATIONS

- 2. NWRS should immediately establish a baseline inventory and effective firearms management process.
- 3. Each law enforcement program should establish a designated national firearms coordinator.

#### MISSING FIREARMS

All Departmental law enforcement programs require that missing or stolen assigned firearms be immediately reported and investigated. The Department also requires that all missing firearms be reported to the Office of Law Enforcement and Security (OLES) through Serious Incident Reporting procedures. Despite these requirements, we found that weapons missing from firearms caches are handled differently and are less likely to be reported as missing or investigated. Instead of handling missing cache firearms the same as a missing assigned firearm, in most cases, missing cache firearms discovered during annual property inventories are simply treated as inventory discrepancies or paperwork errors. It is not until the firearms inventory is completed and supporting documents are reviewed, sometimes days or months later, that a weapon may be considered missing and reported as such.

There are no specific Departmental or bureau guidelines for reporting missing cache firearms.

How missing firearms are reported varies among bureaus and their individual office locations. In most cases, the person responsible for maintaining the firearms inventory is also the person responsible for reporting missing weapons. Many individuals we interviewed could only describe procedures used to investigate missing weapons in general terms. Concerns over the inherit dangers that these missing firearms pose to public safety should necessitate a sense of urgency for bureaus to make every effort to locate missing weapons; however, we found some cases where bureaus did not always report, or report in a timely manner, missing firearms.

We found that in some cases, missing weapons are merely reported to a Board of Survey with little or no documentation and then requested to be removed from an office's inventory. In other cases, criminal or administrative investigations of the missing firearm are conducted depending on the circumstances of the loss. In many cases nothing is done, and the weapons remain on the inventory for weeks or even years without any action being taken.

The Department's inventory process exacerbates this problem by failing to provide a mechanism for more frequent inventories or timely entries into property management systems. Most of the individuals charged with the responsibility of maintaining firearms caches told us that they do not have the authority to access or update this system and had to rely on others in regional offices to enter inventory data. As a result, inventory information maintained in the system is incomplete and rarely accurate. Furthermore, timeliness for updating this system varied between bureaus from days to years. Consequently, we were unable to determine how many weapons were missing from each law enforcement program.

According to the director of OLES, "a weapon is a weapon, either in a cache or on somebody's hip...they should be reported the same." We found that this sentiment is not consistently understood by those responsible for maintaining firearms inventories.

#### RECOMMENDATION

4. OLES should revise existing policy to direct that lost or missing cached firearms must be reported and investigated similar to lost or missing assigned firearms.

#### TRAINING

Employees must be made aware of their responsibilities related to firearms control in order to be accountable for safeguarding firearms. We found frequent instances where the inventory of firearms was delegated to a lone law enforcement officer who had no formal property management training and had not been briefed on inventory responsibilities. None of the law enforcement programs we reviewed required the firearms custodial officer to be formally trained in standardized inventory procedures.

Few of the individuals we interviewed have attended any type of formal training. Instead, we were told inventory education is regularly obtained through on-the-job training or institutional knowledge passed down over time. The lack of management-dictated firearms inventory training lessens the importance of overall firearms accountability, makes responsibilities related to firearms control unclear, and results in difficulties in holding appropriate individuals accountable for failing to follow established procedures.

Many of the people we interviewed were unaware that online inventory management training exists through DOI Learn operated by the Department's National Business Center. Despite FWS' specific efforts to provide online property management training, most FWS and NWRS law enforcement personnel did not know that this training existed. Those assigned to property management agreed that formal training should be provided.

We discovered that noncommissioned administrative personnel are also involved in conducting firearms inventories, have access to firearms caches at some locations, and may not possess the requisite firearms safety training when handling weapons during inventories.

#### RECOMMENDATIONS

- 5. The Department should develop mandatory training for custodial and accountable property officers charged with maintaining law enforcement firearms inventories.
- 6. Firearms should only be handled by those employees who have received firearms safety training.

ACQUISITION,
RETENTION, AND
DISPOSAL

Firearms acquisition and disposal is a disparate process across the Department's law enforcement programs. While some law enforcement programs acquire firearms through a central purchasing program, others purchase firearms on a regional or local basis without the immediate knowledge of property management officials. Acquiring firearms in this manner limits the ability of law enforcement officials to accurately account for their firearms inventories.

**ACQUISITION** 

We discovered that BLM, FWS, and NWRS acquired firearms used to conduct undercover investigations through court-ordered forfeitures. While we were told the number of forfeited weapons was low, the Department has not issued any guidance to bureaus on documenting forfeited weapons and their subsequent use in these operations. This lack of Departmental guidance provides an opportunity for forfeited weapons to be converted to personal use rather than being placed in the bureau's official firearms inventory.

RETENTION

Some sites we visited had acquired weapons that could not be associated to an operational function of the bureau. For example, we found a shotgun stored at the Patuxent Research Refuge that was confiscated from a citizen but had no apparent official status. Not until OIG investigators announced a site visit did law enforcement and management attempt to determine an appropriate status for this firearm. It took a telephone call to a retired law enforcement officer to learn the shotgun was confiscated from a citizen several years prior and should have been returned to the owner.



Two assault weapons located in NYFO firearms storage closet.

A senior law enforcement executive who has spent 30 years in NWRS told us he knows that refuges "squirrel" away firearms.

In another case, we discovered two assault weapons stored in the NYFO firearms storage closet that were not listed on the official inventory. Both weapons were labeled "safe keeping private owner abandoned." We received two conflicting accounts about how these weapons came into USPP custody when we questioned the office's firearms custodians about those weapons. One explained that they had been turned in approximately 18 years ago by a private citizen after the assault weapons ban went into effect. The other told us that the weapons had been seized as evidence during a criminal investigation but were no longer needed. Neither firearms custodian could tell us why the weapons were still being stored.

## RECOMMENDATIONS

- 7. All firearms acquisitions should be approved by the program's chief of law enforcement.
- 8. OLES should develop guidance for the conversion of courtordered forfeited firearms to government use.

DISPOSAL

Similar to the acquisition of law enforcement firearms, we found the process for destroying excess or inoperable law enforcement firearms varied throughout the Department. For example, NPS generally uses its Springfield Armory as a central repository for the destruction of

its firearms; however, NPS FLETC personnel destroy their firearms locally due to the cost of shipping weapons to Springfield, MA. Officials at other sites we visited described various methods and processes used to destroy their firearms locally. Despite their ability to do so, some bureaus have simply procrastinated or chose not to destroy obsolete or inoperable firearms.



Excessive cached firearms at Okefenokee NWR.

The Department has not issued any guidance to bureaus regarding the timely disposal of law enforcement firearms. The General Services Administration (GSA), however, provides guidance through GSAXcess® to any agency seeking reduction in its weapon caches through an online means of reporting excessive property to other government entities looking to acquire specific property. GSAXcess® has other avenues by which weapons could be given to authorized state and local police departments. Furthermore, GSA provides guidance in the destruction of firearms through the Federal Property Management Regulations.<sup>4</sup>

#### RECOMMENDATION

9. The Department should direct bureaus to comply with GSA standards for the disposal of firearms.

<sup>&</sup>lt;sup>4</sup> 41 C.F.R. § 101-42.1102-10.

# SECURITY OF FIREARMS CACHES

Despite the inherent dangers of firearms, neither the Department nor the bureaus have established specific security standards for their storage. While most firearms caches we observed were stored in a gun safe or had a similar type of controlled access, the level of physical security of those storage areas varied greatly. At minimum, all firearms storage areas are restricted from public access.

BOR locations have multi-layered security systems and store cache firearms in rooms similar to a bank vault. Each location is protected by intrusion detection alarm systems and closed circuit television (CCTV) surveillance camera systems that are continuously monitored by onsite law enforcement and security personnel. Vault-like doors containing combination locks along with electronic access control devices are used to control access to firearms storage areas. Direct access to the actual firearms is further restricted to those law enforcement officers authorized to issue firearms.

Similar to the BOR facilities, all DOI firearms caches stored at FLETC are kept in a secure building that is protected by intrusion detection alarm systems and CCTV surveillance camera systems that are continuously monitored by FLETC security personnel. Weapons storage areas within the building are further segregated from each other by locked steel cages. Authorized personnel only have access to their specific storage area.

Most of the firearms storage areas we observed in BIA, FWS, NPS, and USPP field locations were similarly protected with intrusion detection alarm systems and CCTV surveillance camera systems. The majority of these field locations also restrict access to firearms storage areas to authorized law enforcement personnel; however, a number of the firearms custodians could not tell us when new key locks were installed or combinations changed on firearms storage areas or gun safes.

The BLM firearms storage closet was protected by an intrusion detection alarm system, but was not designed to prevent access through the ceiling. In addition, both law enforcement and civilian

administrative personnel were provided the alarm access code to the closet.

We also discovered firearms being stored at some BIA, NWRS, and USPP facilities with only rudimentary security protection in place. For example, one BIA agency office and a NWRS refuge store their firearms in gun safes situated in office areas accessible to anyone in their buildings. Both buildings have no security systems other than a lock on the door.

Another refuge stores firearms at its headquarters office, visitor's center, and horse stable. Although firearms are stored in gun safes at these three locations, none of the buildings are protected by electronic security systems. The intrusion detection alarm at the visitor's center was disabled due to the number of false alarms being generated.

The firearms cache at the USPP NYFO was stored in a locked room; however, neither of the two firearms custodians responsible for those weapons was able to tell us who had been issued keys to the room or when the locks had been changed.

#### RECOMMENDATION

10. OLES should develop minimum physical security standards for firearms caches.

## RECOMMENDATIONS

- 1. The Department should reclassify firearms from sensitive to dangerous property and establish inventory guidance commensurate to this enhanced classification.
- 2. NWRS should immediately establish a baseline inventory and effective firearms management process.
- 3. Each law enforcement program should establish a designated national firearms coordinator.
- 4. OLES should revise existing policy to direct that lost or missing cached firearms must be reported and investigated similar to lost or missing assigned firearms.
- 5. The Department should develop mandatory training for custodial and accountable property officers charged with maintaining law enforcement firearms inventories.
- 6. Firearms should only be handled by those employees who have received firearms safety training.
- 7. All firearms acquisitions should be approved by the program's chief of law enforcement.
- 8. OLES should develop guidance for the conversion of courtordered forfeited firearms to government use.
- 9. The Department should direct bureaus to comply with GSA standards for the disposal of firearms.
- 10. OLES should develop minimum physical security standards for firearms caches.

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