USDA

Audit Report

Security Over
Animal and Plant Health Inspection Service's
Owned and Leased Aircraft

Report No. 33601-1-AT
September 2004

DATE: September 14, 2004

REPLY TO
ATTN OF: 33601-1-At

SUBJECT: Security Over Animal and Plant Health Inspection Service's
            Owned and Leased Aircraft

TO: W. Ron DeHaven
            Administrator
            Animal and Plant Health Inspection Service

ATTN: William Hudnall
            Deputy Administrator for Marketing Regulatory Program
                Business Services

This report presents the results of the subject audit. Your response dated September 3, 2004, to the draft report is included as exhibit A, with excerpts and the Office of Inspector General's position incorporated into the relevant Findings and Recommendations section of the report. Based on your response, we have accepted management decisions on Recommendations Nos. 1 and 2. For Recommendation No. 3, we will need the estimated timeframes for completing the implementation of security measures at all Animal and Plant Health Inspection Service locations.

Follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer. Final action on the management decisions should be completed within 1 year of the date of this report to preclude being listed in the Department's Performance and Accountability Report.

We appreciate the courtesies and cooperation extended to us by members of your staff during the audit.

/s/
ROBERT W. YOUNG
Assistant Inspector General
    for Audit

Executive Summary
Security Over Animal and Plant Health Inspection Service's Owned and Leased Aircraft (Audit Report No. 33601-1-AT)

Results in Brief

In its effort to assist the Government in strengthening homeland security since September 11, 2001, the Office of Inspector General continues to review those assets of the U.S. Department of Agriculture (USDA) that could be vulnerable to terrorist attacks or could enable terrorists to mount attacks within this country. As part of this effort, we reviewed the Animal and Plant Health Inspection Service's (APHIS) security controls for aircraft owned or operated by the Wildlife Services (WS) and the Plant Protection and Quarantine (PPQ) mission. APHIS has a total of 35 aircraft located throughout the country at 26 general aviation airports and airfields and at 1 Federal airbase.

Although APHIS has taken some steps towards mitigating risks, our review disclosed that its aircraft were vulnerable to theft because the agency had not developed standard policies and procedures for securing aircraft and had not performed an overall assessment of risks related to the potential for theft. Agency officials said they had not developed policies or procedures for securing aircraft because they were waiting for USDA to issue formal guidance. WS had no written guidance for securing its 28 mission aircraft at official duty stations and offsite locations. PPQ officials stated that they were drafting policies and procedures to address facility and aircraft security at the airbase storing its seven aircraft.

USDA issued the <u>Integrated Physical Security Standards and Procedures Handbook</u> on November 14, 2003. Chapter 2, on aviation security, disseminates procedures for mitigating risks and threats associated with USDA aviation operations. APHIS aviation officials were not aware of the formal issuance of the handbook until May 4, 2004, because they had not received notice from the Department. One aviation official acknowledged that there were security measures outlined in the departmental guidance that could be used in establishing security for APHIS aircraft. However, he felt that much of the guidance could not be adapted to general aviation airports. APHIS is currently working on a manual to address security for all the agency's assets, but has not begun working on the section for aircraft security. The agency plans to complete the full security manual by December 31, 2004.

WS employees determined what security measures were needed at particular sites based on an individual understanding of need rather than on a consistent, unbiased assessment of the actual risks posed to the aircraft. We found that WS aircraft were not always equipped with appropriate locking mechanisms, access to the aircraft was not always restricted, and intrusion devices were

not always effectively utilized. On January 12, 2001, the Interagency Committee for Aviation Policy[1] (ICAP) published a <u>Guide for the Conduct of Aviation Resources Management Surveys</u>, which provided agencies with a tool to assist in tailoring aircraft security programs to their particular needs. This guide addresses critical risk areas for aviation security. However, WS did not use the guide to assess its aircraft security. PPQ conducted a comprehensive risk assessment and implemented most of the recommended actions such as installing alarms sensitive to glass breaking, connecting alarms to the guard shack, and installing low-light closed circuit television cameras. PPQ had not implemented recommendations to install security bars on the windows and replace the main entry door with a security door having a card reader and electronic lock. These recommendations were not implemented because of lack of funding.

We noted that neither WS nor PPQ had established procedures for securing aircraft while at temporary work locations or for reporting to APHIS headquarters or responsible officials such incidents as missing aircraft, unauthorized entry, threatening telephone calls, or vandalism.

According to recent Government Accountability Office (GAO) testimony,[2] the Transportation Security Administration, tasked with establishing national policy for all forms of transportation, has taken only limited action to improve general aviation security, leaving it far more vulnerable than commercial aviation. In May 2003, the Department of Homeland Security issued an advisory[3] to general aviation pilots and airports to secure unattended aircraft to prevent unauthorized use and report unusual or suspicious activities. The advisory warned that terrorists might mount attacks using general aviation aircraft due to their availability, their less stringent protective measures, and their destructive potential. Because of the vulnerability of general aviation airports and airstrips, it is important that APHIS consider security as a major part of its procedures and responsibilities regarding its aviation operations.

Recommendations in Brief

We recommend that APHIS develop written policies and procedures for the security of mission aircraft based on an overall risk assessment of vulnerabilities related to theft or unauthorized use. The policies and procedures should provide a consistent method of appraising all aspects of

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[1] Established by the General Services Administration in 1989, ICAP is made up of 18 Federal agencies working together to identify and coordinate policy views for the Federal aviation community and to foster safe, efficient, and effective Federal aviation operations.

[2] Testimony given on November 20, 2003, GAO-04-285T, "Efforts to Measure Effectiveness and Strengthen Security Programs."

[3] Department of Homeland Security Advisory 03-019 dated May 1, 2003, "Security Information for General Aviation Pilots/Airports."

the agency's aircraft security; set basic standards for securing aircraft at the various airports, airstrips, and temporary duty sites; and serve as a formal security program for the agency. An overall risk assessment should be made concerning the vulnerability of APHIS aircraft and site assessments should be performed utilizing guidelines provided by ICAP. To establish acceptable security for APHIS aircraft, we recommend that, once the formal risk assessments are performed, the agency ensure that all security issues identified during the assessments are appropriately addressed.

Agency Response   In its September 3, 2004, written response to the draft report, APHIS concurred with the findings and recommendations in the report, and provided timeframes for completing security procedures and risk assessments.

OIG Position   We agree with management decision for Recommendations Nos. 1 and 2. To achieve management decision for Recommendation No. 3, we will need the estimated timeframes for completing the implementation of security measures at all sites.

Abbreviations Used in this Report

Table of Contents

Background and Objectives

Background   The Animal and Plant Health Inspection Service (APHIS) is responsible for protecting and promoting U.S. agricultural health, administering the Animal Welfare Act, and carrying out wildlife damage management activities. It protects America's animal and plant resources by safeguarding them from exotic invasive pests and diseases, monitoring and managing agricultural pests and diseases existing in the United States, resolving and managing foreign trade issues related to animal and plant health, and ensuring the humane care and treatment of animals.

APHIS is organized into six program offices: Animal Care, Biotechnology Regulatory Services, International Services, Plant Protection and Quarantine (PPQ), Veterinary Services, and Wildlife Services (WS). In the United States, WS and PPQ utilize aircraft for (1) pest control programs, such as responding to emergency pest outbreaks and dispersal of sterile insects to control pest populations; (2) wildlife management and predator control programs; and (3) research and development projects. The agency uses owned, leased, or borrowed aircraft to accomplish its mission.

WS has 28 aircraft at 26 locations in 12 Western states including 17 Piper Super Cubs, 7 Aviat Huskys, and 4 helicopters. WS leases hangar space at general aviation airports for 27 of 28 aircraft, and 1 aircraft is stored on a private ranch. The 28 aircraft are used for wildlife management and predator control programs.

PPQ has seven aircraft at Moore Air Base in Mission, Texas. Moore Air Base is owned and operated by the U.S. Department of Agriculture (USDA). The 7 aircraft stored in one hangar include 4 Cessna 206's, 2 Cessna A188B's with sprayers, and 1 Beechcraft Barron Model 58 aircraft. All of the aircraft have been configured to support current pest control programs, such as responding to emergency pest outbreaks and dispersal of sterile insects to control pest populations. Typical modifications include equipment to release sterilized fruit flies and chemical sprayers. The Cessna 206's have a useful capacity between 400 to 1100 pounds. The Cessna A188B's have a built-in delivery system, with a capacity of 280 gallons of wet or dry chemicals, and can easily be sprayed into a 75ft spray pattern or dumped in mass quantity. The Baron has a useful capacity between 400 to 800 pounds. These aircraft support PPQ's missions across the entire United States.

The Transportation Security Administration (TSA) is responsible for security over all modes of transportation within the United States. Established by the Aviation and Transportation Act (Public Law 107-71) of November 2001, the TSA assesses threats to transportation and develops policies, strategies and plans for dealing with those threats. TSA communicates to both commercial

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and Government providers of transportation largely in the form of advisories. TSA moved from the Department of Transportation to the Department of Homeland Security in March 2003.

Objectives   The objectives of the survey were to evaluate whether APHIS had established security controls sufficient to ensure that its owned, leased, or borrowed aircraft were protected from theft or unauthorized use; and whether the agency had provided guidance to its staff for ensuring aircraft were secure at all times.

Findings and Recommendations
Section 1.   Aircraft Security Controls

We found that APHIS had not established written policies and procedures for securing mission aircraft and WS had not used formal site risk assessments to identify and address security issues at aircraft storage facilities. Because of the lack of standard policies and procedures and formal site assessments, security measures implemented by APHIS were not sufficient to ensure that aircraft were protected from theft and possible use as terrorist weapons.

Following the September 11, 2001, multiple terrorist attacks against U.S. civil air carriers, the World Trade Center, and the Pentagon, the Federal Aviation Administration (FAA) advised of the potential for additional terrorist attacks involving civil and general aviation aircraft.   In October 2001, FAA sent security guidance to all public-use airports and airfields asking members of the general aviation community to observe good physical security and to report suspicious persons, activities, and operations around airports. FAA advised that terrorists, who are no longer able to hijack commercial airliners because of increased security at commercial airports, might turn to general aviation airports and aircraft to conduct operations. To prevent unauthorized use of aircraft, each owner/operator should take steps appropriate to the specific type of aircraft to secure it when unattended.

Finding 1   **APHIS Had Not Issued Written Policies and Procedures for Establishing Risk-Based Security for Mission Aircraft**

APHIS had not established written security policies and procedures sufficient to secure its 35 owned and leased aircraft stored at small or private storage facilities. The agency was waiting for USDA to issue guidance before establishing and implementing policies and procedures of its own. Meanwhile, at each storage location, WS employees determined what security measures were needed based on an individual understanding of need rather than on a consistent, unbiased assessment of the actual risks posed to the aircraft. In the absence of a concerted agency policy guiding risk-based security measures, the security that was implemented at WS aircraft locations was inconsistent and inadequate (see Finding No. 2).

Policies and Procedures Are the First Line of Defense

The Government Accountability Office's (GAO) Standards for Internal Control in the Federal Government, dated November 1999, states that effective internal controls through written policies and procedures serve as "the first line of defense in safeguarding assets" and provide consistent

actions to help mitigate weaknesses or vulnerabilities. Although APHIS had developed an <u>Aircraft Operations Manual</u>, dated 1999, that addresses general aircraft policy, safety, administration, international services, contractor performance, and accident reporting and investigations, the manual did not address securing the aircraft.

APHIS also established an Aircraft Resource and Utilization Management Team (ARUMT) in 1993 to address the agency's aircraft policies and procedures. The ARUMT team (consisting of three aviation managers from International Services, WS, and PPQ, and the APHIS Aviation Program Manager) meets at least twice a year to discuss aviation policy, procedures, and operations and to update the manual whenever necessary to conform to Federal aircraft regulations. Because there were no regulations specific to securing general aviation aircraft, ARUMT was waiting for USDA to issue formal guidance.

The Department issued the <u>Integrated Physical Security Standards and Procedures Handbook</u> on November 14, 2003. Chapter 2, on aviation security, disseminates procedures for mitigating risks and threats associated with USDA aviation operations. APHIS aviation officials were not aware of the formal issuance of the handbook until May 4, 2004, because they had not received notice from the Department. The ARUMT team leader pointed out that the Department issued the physical security procedures as a handbook rather than as a manual, and concluded that this was likely done because the disparity among USDA agencies would make it difficult to issue one set of requirements. He acknowledged that there were security measures outlined in the departmental guidance that could be used in establishing security for APHIS aircraft. However, he felt that much of the guidance could not be adapted to general aviation airports. APHIS is currently working on a manual to address security for all the agency's assets, but has not begun working on the section for aircraft security. The agency plans to complete the full security manual by December 31, 2004.

Neither WS nor PPQ had written security policies and procedures in place. WS had no written guidance for securing its 28 mission aircraft at official duty stations and offsite locations. PPQ officials stated they were drafting policies and procedures to address facility and aircraft security at the airbase storing its seven aircraft. We also noted that neither WS nor PPQ had established procedures for securing aircraft while at temporary work locations or for reporting to APHIS headquarters or responsible officials such incidents as missing aircraft, unauthorized entry, threatening telephone calls, or vandalism.

<u>Policies Need to Establish Risk-Based Security Measures</u>

GAO advocates a risk management approach to guide Federal programs to better assess aviation security by analyzing threats and vulnerabilities, identifying corrective actions to take, and mitigating weaknesses that could be exploited. Its standards on internal control states that management needs to comprehensively identify risks and that a precondition to assessing risk is the establishment of clear, consistent agency objectives. In its March 30, 2004, testimony before Congress, GAO noted that TSA was developing a risk-based, self-assessment tool for general aviation airports.[4]

Federal agencies already have such a risk-based, self-assessment tool. On January 12, 2001, the Interagency Committee for Aviation Policy[5] (ICAP) published a <u>Guide for the Conduct of Aviation Resources Management Surveys</u>, which was designed in part to assist agencies in tailoring aircraft security programs to their particular needs. ICAP issued a subsequent draft aviation guide on May 7, 2003. Both guides address critical risk areas such as restricting access to aircraft, installing aircraft locking devices to protect the aircraft during overnight trips away from the home base, establishing protocols for reporting incidents to proper officials, transient aircraft security, and background checks of employees.

Because of APHIS' lack of standard policies and procedures, formal risk assessments had not been performed at all individual WS aircraft storage sites, and appropriate actions had not been taken to ensure that the aircraft were secure. After September 11, 2001, WS conducted informal security reviews at individual aircraft sites and implemented some security measures. Local officials or the aviation manager conducted the reviews, but did not document them. However, the reviews were not performed with the aid of any specific guidance, and security was generally left up to employees at the different sites, resulting in inconsistencies from location to location. PPQ conducted a comprehensive risk assessment and implemented many of the recommendations such as installing alarms sensitive to glass breaking, connecting alarms to the guard shack, and installing low-light closed circuit television cameras.

Additionally in May 2003, APHIS performed a cursory review of aircraft security at all sites as part of a survey of the security over its infrastructure. This review included collecting information about the facility—the type of access road, the type of area the facility was in, the construction of the facility, its parking, perimeter security, emergency planning, security guards,

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[4] Testimony given on March 30, 2004, GAO-04-592T, "Improvement Still Needed in Federal Aviation Security Efforts." This was followup to November 20, 2003, testimony.
[5] Established by the General Services Administration (GSA) in 1989, ICAP is made up of 18 Federal agencies working together to identify and coordinate policy views for the Federal aviation community and to foster safe, efficient, and effective Federal aviation operations.

and security systems, and the types of threats it received in the past. However, there was no risk-based analysis performed to determine appropriate security measures. The APHIS survey questionnaire did not inquire about aircraft entry/access, identification badges, background investigations, security training, site security officers, security roles/responsibilities, access authorization lists, aircraft locking procedures during overnight trips, aircraft locking devices, key control, handling security alarm codes and responses; refueling practices, security of fuel tanks trucked to remote sites for mission refueling, and reporting incidents. These activities also need assessing. Careful site-by-site evaluations are needed. After APHIS completes and documents security site assessments identifying threats, risks, vulnerabilities, and targets, security plans identifying recommended security countermeasures should be developed.

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In testimony given to Congress on November 20, 2003, GAO stated that TSA had taken only limited action to improve security over general aviation, leaving it far more vulnerable than commercial aviation. In May 2003, the Department of Homeland Security issued an advisory[6] to general aviation pilots and airports to secure unattended aircraft to prevent its unauthorized use and report unusual or suspicious activities. The advisory warned that terrorists might use general aviation aircraft to mount attacks due to that aircraft's availability, its less stringent protective measures, and its destructive potential.

It is important that APHIS consider security as a major part of its procedures and responsibilities regarding its aviation operations. As such, APHIS should perform an overall assessment of risks pertaining to its mission aircraft and incorporate appropriate controls into standard procedures to ensure that aircraft are secure.

Recommendation No. 1

Develop written policies and procedures for the security of aircraft based on an overall risk assessment of vulnerabilities related to theft or unauthorized use. The policies and procedures should provide a consistent and unbiased tool to appraise all aspects of the agency's aircraft security; set basic standards for securing aircraft at the various airports and airstrips as well as temporary duty sites; and serve as a formal security program for the agency.

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[6] Department of Homeland Security Advisory 03-019 dated May 1, 2003, "Security Information for General Aviation Pilots/Airports."

Agency Response. In its September 3, 2004, response, APHIS concurred with the recommendation:

> *An overall risk assessment format will be coordinated and developed through APHIS Security Specialist * * * office by December 31, 2004. Policies and procedures will be drafted by June 2005 to provide consistent, unbiased appraisal of each location's security to enhance standardization of security measures. Implementation of security items not already in place according to written procedures and basic standards will begin in September 2005 after completion of physical risk assessments. Many basic security measures have been implemented such as propeller locks and security systems and other means of immobilizing the aircraft. Written policy should provide standardization or consistency. An Aviation Security Officer will be designated by the WS Aviation Program and the APHIS Security Team who will work in coordination with the APHIS Security Team Leader and the WS National Aviation Program Manager ensuring basic security measures have been implemented and are being maintained. This position should be filled by November 1, 2004. A formal security program will be drafted by the WS Aviation Program using ICAP as guidance and approval.*

OIG Position. We accept management decision for this recommendation.

Recommendation No. 2

Ensure that formal risk assessments are performed at all WS aircraft sites using the ICAP guidance.

Agency Response. In its September 3, 2004, response, APHIS concurred with the recommendation:

> *WS National Aviation Program and the APHIS Security Team Leader will designate a collateral duty Aviation Security Officer by November 1, 2004. This individual will receive appropriate security training to develop and conduct formal risk assessments. The designated security officer's responsibility will be to perform formal risk assessments using ICAP as guidance and implement risk assessment recommendations.*

OIG Position. We accept management decision for this recommendation.

Finding 2	**Security Measures Taken for APHIS Aircraft Were Not Always Appropriate to the Levels of Risk at the Storage Locations**

Security measures taken at various sites were not always adequate to ensure that aircraft were protected from theft. This occurred because APHIS had not performed formal risk assessments at WS sites housing 28 aircraft and because some recommendations from a formal risk assessment at the USDA base housing 7 PPQ aircraft were not implemented. Additionally, APHIS officials were concerned about whether the agency had funds to pay for security enhancements. The absence of security measures increases the risk that the agency's small planes or helicopters could be stolen and used as terrorist weapons.

Physical security planning is not intended to make a facility impenetrable. The goal is to make the commission of a crime more difficult and time consuming and, therefore, unattractive to any potential criminal or terrorist. An environment should be created that utilizes access controls and visible security devices, such as alarms, to make the aircraft unattractive to criminals. Anything that increases the likelihood of a criminal's actions being observed or reported is a deterrent, and physical barriers will help delay a crime. Additionally, early detection increases the odds that a criminal will be apprehended and that a terrorist act will be prevented.[7]

To perform our review, we sent questionnaires to all APHIS aircraft sites to obtain information concerning security at the individual locations. Using information in the questionnaires, we judgmentally selected eight WS sites that housed nine aircraft and provided a variety of security conditions. We found that WS aircraft were not always equipped with appropriate locking mechanisms, access to APHIS aircraft was not always restricted, and intrusion devices were not always effectively utilized. For PPQ aircraft, we found that some of the needed security measures recommended in a formal risk assessment report had not been implemented.

<u>Aircraft Were Not Always Equipped With Appropriate Locking Mechanisms</u>

APHIS aircraft were not always equipped with adequate protective equipment such as locks for throttles, control columns, propellers, wheels, or fuel tanks that provide low-cost, effective theft deterrents. Of the 28 WS aircraft, 24 were periodically away from their duty locations overnight and only 1 had an additional security mechanism. APHIS did not always have access to secure hangars while at remote locations. For example, one aircraft was tied down only with a rope during temporary storage at work sites and had no locking devices. USDA's handbook on

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[7] Analysis contained in the draft <u>ICAP Aviation Security Guide</u>, dated May 7, 2003.

aviation security states that security devices, such as those listed above, should be used to the fullest extent possible without hampering operations.

<u>Access to Aircraft Was Not Always Restricted</u>

We found that access to APHIS aircraft was not always restricted. Of the 28 WS aircraft, 9 were not in individual hangars. The use of individual hangars and visible identification badges helps to ensure that only authorized personnel have access to the aircraft.

For example, the hangar at one site was attached to the airport's main office, which had a constant flow of people. The rest rooms for the airport were located in the hangar, and no identification badges were required for the area. The airplane was stored in the shared, open-bay hangar with five other privately owned aircraft (see figures 1 and 2). Typically, the hangar was secured behind locked hangar doors at night. However, the hangar was unlocked for 2 weeks during the summer to provide restroom access to a group of glider enthusiasts.[8] The APHIS aircraft did not require an ignition key, and was vulnerable to theft.

Figure 1 – The Office of Inspector General (OIG) photo of APHIS aircraft in a shared hangar.

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[8] Gliders refer to fixed-winged aircraft without engines.

Figure 2 - OIG photo of private aircraft in the same, shared hangar.

At another location, the aircraft was secured inside a mechanic's workshop hangar with unrestricted access. An APHIS official stated that better security was needed and the agency had "entered into the long process" of working with the airport and GSA to obtain a more secure hangar. We made a followup contact with the official on April 19, 2004, and were told that he understood that a moratorium had been placed on new construction and there would be no funds for the new hangar.

Intrusion Devices Were Not Always Effectively Utilized

APHIS did not always utilize intrusion devices, such as alarm systems and cameras that were appropriate to the conditions at the airports. Visible intrusion devices, such as alarms, not only make the aircraft unattractive to criminals, they provide for early detection of unauthorized entry and increase the odds that a criminal will be apprehended and that a terrorist act will be prevented.[9] Security alarms were installed in hangars storing only 12 of WS' 28 aircraft, and only 9 of these alarms were connected to local law enforcement or monitoring services. Security cameras were not utilized at locations storing 26 of the 28 aircraft.

For example, the aircraft hangar at one site had an alarm installed, but it was not being used. An APHIS employee indicated that there had been no incidents at the agency's hangar. However, other hangars at the airport had been broken into. There were no security guards stationed at the airport, and no way of timely alerting authorities of intrusions into the aircraft hangar. The official also indicated that the airplane was fueled after each flight, leaving it with a full tank during non-business hours.

The use of alarm systems at various sites was also inconsistent. For example, one site that had no fences or barriers, no security guards on the premises,

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[9] Analysis contained in the draft ICAP Aviation Security Guide, dated May 7, 2003.

and no video cameras, and also had no security alarm. In contrast, another site with the same security conditions had motion detectors and sensing devices that activate an alarm monitored by local law enforcement.

A WS official stated that APHIS used homeland security funds to install alarm and monitoring systems. However, he expressed concerns that homeland security funds were not provided for continued monitoring services and that it would be necessary to use general APHIS appropriations to maintain the services. He was unsure of the future availability of funds for monitoring.

<u>PPQ Implemented Most of the Recommendations from a Comprehensive Security Review</u>

PPQ conducted a comprehensive risk assessment and implemented most of the recommended actions such as installing alarms sensitive to glass breaking, connecting alarms to the guard shack, and installing low-light closed circuit television cameras. PPQ had not implemented recommendations to install security bars on the windows and replace the main entry door with a security door having a card reader and electronic lock. These recommendations were not implemented because of lack of funding.

Recommendation No. 3

Ensure that all security issues identified during formal risk assessments are appropriately addressed and that effective security measures are implemented.

Agency Response. In its September 3, 2004, response, APHIS concurred with the recommendation:

> *As stated above, the WS National Aviation Program will designate a collateral duty Aviation Security Officer. This individual will receive appropriate training particular to aircraft and aircraft location security, conducting risk assessments, and identifying security risks. Implementation of security measures will be coordinated throughout the identified State programs with the WS National Aviation Manager, APHIS Security Team Leader, respective State Directors, and aviation field personnel.*

OIG Position. We agree with the proposed action. However, in order to reach management decision, we will need the estimated timeframes for completing the implementation of security measures at all sites.

Scope and Methodology

We performed the fieldwork between April 2003 and May 2004. We visited APHIS headquarters and conducted interviews with APHIS officials to gain working knowledge of APHIS aviation operations and to obtain and review aircraft security assessments, plans, reports, polices and procedures. We e-mailed a security questionnaire to officials responsible for the 28 WS and 7 PPQ mission aircraft to obtain information about the security at the locations, aircraft security assessments, plans, reports, policies, and procedures. We also judgmentally selected and visited sites for 9 of the 28 WS mission aircraft. We visited those sites because the aircraft security at those sites provided a variety of security conditions. We conducted security reviews and interviews at those sites during the week of June 16, 2003.

In order to complete our objectives, we performed the following steps.

- Reviewed policies and procedures related to security of aircraft and their storage.

- Reviewed external and internal reports addressing the aircraft security and related matters.

- Interviewed APHIS office officials.

- Conducted inventory and physical security reviews at judgmentally selected sites.

We conducted this audit in accordance with generally accepted government auditing standards.

Exhibit A - *Agency Response*

USDA

United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Animal and
Plant Health
Inspection
Service

Washington, DC
20250

SEP   3   2004

SUBJECT: Security Over APHIS' Owned and Leased Aircraft
                  (OIG Audit 33601-1-AT)

TO: Robert W. Young
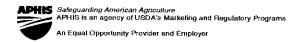   Assistant Inspector General for Audit
                  Office of Inspector General

The enclosed information contains our comments for each recommendation identified in OIG's recent audit. The information is based on responses to specific findings and recommendations for each finding. Some include target dates for completion, as well as information on some recommendations that have already been implemented.

If you have any questions, please contact Judith Allen at (301) 734-5412.

W. Ron DeHaven
Administrator

Enclosure

APHIS *Safeguarding American Agriculture*
APHIS is an agency of USDA's Marketing and Regulatory Programs
An Equal Opportunity Provider and Employer

Exhibit A - *Agency Response*

Agency Response to OIG Draft Report No. 33601-1-AT
Animal and Plant Health Inspection Service's Owned and Leased Aircraft

Executive Summary

In reference to the Office of the Inspector General's (OIG) official draft report (No. 33601-1-AT) dated July 26, 2004, the Animal and Plant Health Inspection Service (APHIS), Wildlife Services (WS), provides the following response.

We have structured our specific responses to coincide with the specific findings and recommendation for each finding. Our responses follow:

Finding 1. APHIS Had Not Issued Written Policies and Procedures for Establishing Risk-Based Security for Mission Aircraft

> **Recommendation 1:** Develop written policies and procedures for the security of aircraft based on an overall risk assessment of vulnerabilities related to theft or unauthorized use. The policies and procedures should provide a consistent and unbiased tool to appraise all aspects of the agency's aircraft security; set basic standards for securing aircraft at the various airports and airstrips as well as temporary duty sites; and serve as a formal security program for the agency.
>
> **Agency Response:**
> An overall risk assessment format will be coordinated and developed through APHIS Security Specialist[   ]office by December 31, 2004. Policies and procedures will be drafted by June 2005 to provide consistent, unbiased appraisal of each location's security to enhance standardization of security measures. Implementation of security items not already in place according to written procedures and basic standards will begin in September 2005 after completion of physical risk assessments. Many basic security measures have been implemented such as propeller locks and security systems and other means of immobilizing the aircraft. Written , policy should provide standardization or consistency. An Aviation Security Officer will be designated by the WS Aviation Program and the APHIS Security Team who will work in coordination with the APHIS Security Team Leader and the WS National Aviation Program Manager ensuring basic security measures have been implemented and are being maintained. This position should be filled by November 1, 2004. A formal security program will be drafted by the WS Aviation Program using ICAP as guidance and approval.
>
> **Recommendation 2:** Ensure that formal risk assessments are performed at all WS aircraft sites using the ICAP guidance.
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> **Agency Response:**
> WS National Aviation Program and the APHIS Security Team Leader will designate a collateral duty Aviation Security Officer by November 1, 2004. This individual will receive appropriate security training to develop and conduct formal risk assessments.

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Exhibit A - *Agency Response*

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The designated security officer's responsibility will be to perform formal risk assessments using ICAP as guidance and implement risk assessment recommendations.

Finding 2. Security Measures Taken for APHIS Aircraft Were Not Always Appropriate to the Levels of Risk at the Storage Locations.

Recommendation 3: Ensure that all security issues identified during formal risk assessments are appropriately addressed and that effective security measures are implemented.

Agency Response:
As stated above, the WS National Aviation Program will designate a collateral duty Aviation Security Officer. This individual will receive appropriate training particular to aircraft and aircraft location security, conducting risk assessments, and identifying security risks. Implementation of security measures will be coordinated throughout the identified State programs with the WS National Aviation Manager, APHIS Security Team Leader, respective State Directors, and aviation field personnel.

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