



SOCIAL SECURITY

MEMORANDUM

Date: March 23, 2006

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Social Security Administration's Nationwide Asbestos Program (A-13-05-21521)

The attached final report presents the results of our review. We conducted this review in response to anonymous allegations of mismanagement. Our objective was to determine the validity of these allegations. Specifically, we reviewed the Social Security Administration's policies, procedures, and practices used for the administration of its Nationwide Asbestos Management Program.

Please provide within 60 days a corrective action plan that addresses each recommendation. If you wish to discuss the final report, please call me or have your staff contact Steven L. Schaeffer, Assistant Inspector General for Audit, at (410) 965-9700.



Patrick P. O'Carroll, Jr.

Attachment

**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE SOCIAL SECURITY
ADMINISTRATION'S NATIONWIDE
ASBESTOS PROGRAM**

March 2006

A-13-05-21521

**EVALUATION
REPORT**



Mission

We improve SSA programs and operations and protect them against fraud, waste, and abuse by conducting independent and objective audits, evaluations, and investigations. We provide timely, useful, and reliable information and advice to Administration officials, the Congress, and the public.

Authority

The Inspector General Act created independent audit and investigative units, called the Office of Inspector General (OIG). The mission of the OIG, as spelled out in the Act, is to:

- Conduct and supervise independent and objective audits and investigations relating to agency programs and operations.
- Promote economy, effectiveness, and efficiency within the agency.
- Prevent and detect fraud, waste, and abuse in agency programs and operations.
- Review and make recommendations regarding existing and proposed legislation and regulations relating to agency programs and operations.
- Keep the agency head and the Congress fully and currently informed of problems in agency programs and operations.

To ensure objectivity, the IG Act empowers the IG with:

- Independence to determine what reviews to perform.
- Access to all information necessary for the reviews.
- Authority to publish findings and recommendations based on the reviews.

Vision

By conducting independent and objective audits, investigations, and evaluations, we are agents of positive change striving for continuous improvement in the Social Security Administration's programs, operations, and management and in our own office.

Executive Summary

OBJECTIVE

We conducted this review in response to anonymous allegations of mismanagement. Our objective was to determine the validity of these allegations. Specifically, we reviewed the Social Security Administration's (SSA) policies, procedures, and practices used for its Nationwide Asbestos Management Program (Program).

BACKGROUND

On November 18, 2004, we received an anonymous letter containing allegations that SSA had not addressed issues in our November 1999 report, *Selected Procedures Used in the Social Security Administration's Asbestos Management Program for its Main Complex*. We received additional anonymous allegations on January 25, 2005.

RESULTS OF REVIEW

During our review, nothing came to our attention to indicate mismanagement existed in the Program. However, we determined some of the concerns related to SSA's policies, procedures, and practices were valid, and there were opportunities to improve program management.

CONCLUSION AND RECOMMENDATIONS

While SSA is not statutorily required to have an asbestos management program, it voluntarily adopted some of the provisions contained in the *Asbestos Hazard Emergency Response Act of 1986* to demonstrate its commitment to safeguarding the health and well-being of its employees and the public. The Agency's actions were noteworthy; however, opportunities exist to improve the Program. We recommend that SSA:

- Modify its existing Program protocols to identify when to conduct, and time periods for conducting, the required initial inspections and reinspections of buildings.
- Develop policy to specify when operation and maintenance plans should be reviewed and updated; and to specify when monitoring of work sites in the proximity of asbestos is required.
- Revise, if appropriate, the inter-agency agreement with the Public Health Service-Federal Occupational Health so that the agreement is consistent with Agency policies.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix E.

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Introduction

OBJECTIVE

We conducted this review in response to anonymous allegations of mismanagement. Our objective was to determine the validity of these allegations. Specifically, we reviewed the Social Security Administration's (SSA) policies, procedures, and practices used for its Nationwide Asbestos Management Program (Program).

BACKGROUND

On November 18, 2004, we received an anonymous letter containing allegations that SSA had not addressed issues contained in our November 1999 report, *Selected Procedures Used in the Social Security Administration's Asbestos Management Program for its Main Complex*. We received additional anonymous allegations on January 25, 2005.

The Occupational Safety and Health Act of 1970 (OSHA)¹ requires that Federal agencies establish and maintain an effective and comprehensive occupational safety and health program. The agencies' programs shall provide safe and healthful places and conditions of employment. Further, OSHA requires that Federal agencies report annually on occupational accidents and their occupational safety and health programs to the Secretary of Labor.² Specifically, agencies must record and report on work-related fatalities, injuries and illnesses.³ OSHA does not require that agencies report on asbestos management activities.

SSA's asbestos management program assists the Agency in providing healthful places and conditions of employment. The Office of Environmental Health and Occupational Safety (OEHOS), within SSA's Office of Facilities Management, oversees the Agency's asbestos management program. While SSA is not statutorily required to have an asbestos management program, it voluntarily adopted some of the provisions contained in the *Asbestos Hazard Emergency Response Act of 1986* (AHERA)⁴ to demonstrate its commitment to safeguarding the health and well-being of employees and the public.

AHERA requires public and private elementary and secondary schools to inspect their buildings for asbestos-containing materials.⁵ SSA reported it uses AHERA requirements as guidance to manage asbestos in its Federal buildings. Based on

¹ Public Law 91-596, 84 Stat. 1590 (1970).

² Public Law 91-596, Sec. 19, 84 Stat. 1609 (1970).

³ 29 CFR Part 1904.

⁴ Public Law 99-519, 100 Stat. 2970 (1986).

⁵ 40 CFR 763.80.

AHERA, the Agency developed some internal policies, procedures, and practices to administer its asbestos program; for example, SSA developed its Asbestos Initial and Reinspection Protocols. These Protocols represent a sample of the Agency's written asbestos policies and procedures.

The term "asbestos" describes six naturally occurring fibrous minerals found in certain types of rock formations. Asbestos in buildings was commonly used for thermal insulation, fireproofing, and in various building materials. Intact and undisturbed asbestos materials do not pose a health risk. However, asbestos materials can become hazardous when, due to damage, disturbance, or deterioration over time, asbestos fibers are released into the air of a building. If inhaled, the fibers can cause diseases that disrupt the normal functioning of the lungs.

The General Services Administration (GSA) is responsible for asbestos management in the buildings it owns or leases and SSA staff occupies. As of January 2005, SSA staff occupied 1,862 buildings. Of the 1,862 buildings, GSA delegated authority for the operation and maintenance⁶ of 18 buildings to SSA (see Appendix B). Documents provided by OEHOS staff indicated two of these buildings did not have asbestos. Of the remaining 16, we reviewed documentation related to the Agency's asbestos management activities for 11 buildings at SSA Headquarters in Maryland and 5 in various field locations nationwide.

For the other buildings used by SSA, operation and maintenance activities, including asbestos management, are GSA's responsibility. GSA is required to notify SSA when completing asbestos management activities in buildings operated by GSA and occupied by SSA employees. However, GSA is not required to inform SSA about asbestos management activities in buildings GSA leases for SSA employees to occupy.

Our November 1999 report stated that SSA work sites were not monitored to ensure compliance with standard operating procedures for asbestos containment, and work order approvals were appropriate but lacked quality assurance review. SSA concurred with our findings and reported action was underway to implement our recommendations. We recommended:

- The Office of Main Complex Management's Safety and Occupational Health Specialists monitor work sites in the proximity of asbestos to ensure strict adherence to standard operating procedures.
- The Office of Environmental Policy and Automation Resources review work renovation requests approved in the Office of Main Complex Management to ensure decisions concerning such work orders are appropriate.

⁶ This includes asbestos management.

During our current review, Agency officials explained that, in November 2001, the Offices of Main Complex Management, Environmental Policy and Automation Resources and the Outlying Buildings Management were reorganized and combined to become OEHOS. In February 2005, OEHOS implemented formal procedures for periodically reviewing work orders. However, we did not independently verify these procedures.

Results of Review

During our review, nothing came to our attention to indicate mismanagement existed in the Agency's Program. However, we determined some of the concerns related to SSA's policies, procedures, and practices were valid, and there were opportunities to improve program management.

SSA CAN IMPROVE ITS NATIONWIDE ASBESTOS MANAGEMENT PROGRAM

The controls for SSA's Program needed enhancement. Federal agencies use management controls to reasonably ensure reliable and timely information is obtained, maintained, reported and used for decisionmaking. Management controls developed for agency programs should be logical, applicable, reasonably complete as well as effective and efficient in accomplishing management objectives.⁷

Initial Asbestos Inspections Were Not Always Conducted

Initial asbestos inspections were not always conducted, as required by SSA's Asbestos Inspection Protocol. SSA's Protocol⁸ states, "All SSA offices that will be occupied for six months or more shall be inspected. An inspection will be conducted in those buildings that were constructed in

1990 or later even though the likelihood of the use of asbestos in materials is exceedingly low." Further, AHERA states, "Any building leased or acquired on or after October 12, 1988, that is to be used as a school building shall be inspected...."⁹ The purpose of the inspections is to identify, map the location of, and assess the condition of friable¹⁰ and nonfriable asbestos-containing materials, and to determine potential exposures and risk.

We randomly selected 50 buildings occupied by SSA employees as of January 2005¹¹ (see Appendix C) and requested the initial asbestos inspection reports. We received 35 reports. For the 15 missing reports, SSA provided the following explanations.

⁷ Office of Management and Budget Circular A-123, *Management Accountability and Control*, Revised June 21, 1995.

⁸ SSA Asbestos Inspection Protocol, December 9, 1999.

⁹ 40 CFR 763.85.

¹⁰ Asbestos that can be reduced to dust by hand pressure.

¹¹ SSA employees occupied 1,862 buildings as of January 2005.

- Seven buildings were scheduled to have initial asbestos inspections in 2005.¹²
- Three buildings were not required to have initial asbestos inspections completed.¹³
- Three buildings were not scheduled to have initial asbestos inspections completed because OEHOS was not notified about the relocation of SSA staff to these buildings.
- One building had been newly constructed. Therefore, the building was excluded from the initial asbestos inspection requirement.
- One building's initial asbestos inspection report was pending.

On July 15, 2005, we discussed the results of our work with OEHOS staff. After this discussion, we were provided an initial asbestos inspection report for one of the three buildings indicated above as not scheduled to have an inspection completed. In addition, we received a revised initial Asbestos Inspection Protocol.¹⁴

We believe initial asbestos inspections should have been conducted for two buildings that were not scheduled to have an inspection. Although the revised Agency Protocol states, "Asbestos inspections will be conducted at the leisure of SSA," we believe, without an initial asbestos inspection to identify, map, and assess asbestos in these buildings, the health and well-being of SSA personnel and the public may be at-risk.

Further, we are concerned that written program policy as described in the revised Protocol does not identify a time period within which initial inspections should occur. For example, three of the seven buildings scheduled to have initial asbestos inspections in 2005 were occupied before 2004. SSA management stated they attempt to schedule initial asbestos inspections within the same year or the following year after receiving notification from the regional office that staff has relocated or will relocate. However, it may be in the Agency's best interest to modify its existing Program protocols to identify when to conduct, and specific time periods for conducting, required initial inspections. These modifications will ensure asbestos management program expectations are communicated to SSA personnel and contractors.

¹² As of September 21, 2005, OEHOS staff reported five initial inspections were pending, one initial inspection report was pending, and one exclusion letter was pending. An exclusion letter indicates an assessment was made by some authoritative source that, to the best of their knowledge, a building was constructed without the use of asbestos-containing material.

¹³ SSA's management stated that these three sites are "typically not surveyed because they are small and are not occupied on a continuous basis." These sites include a remote hearing site, training center, and teleconference center.

¹⁴ The revised initial asbestos inspection protocol is included in the document entitled *SSA Asbestos Inspection Protocol*, April 2004.

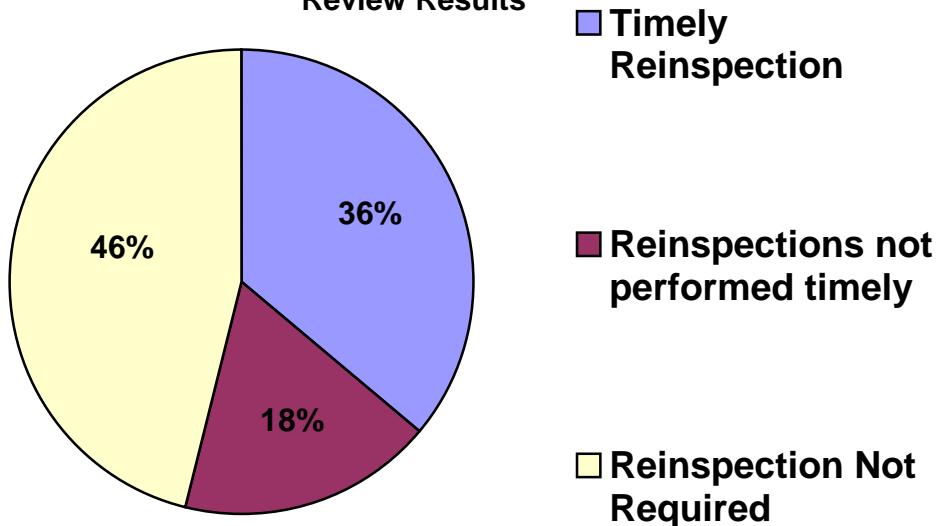
Asbestos Reinspections Were Not Always Performed Timely

Reinspections for buildings with asbestos-containing materials were not always performed timely. The Agency's Asbestos Reinspection Protocol¹⁵ stipulates, "Reinspections of asbestos-containing materials within SSA facilities are conducted every

3 years. All SSA offices that will be occupied for 6 months or more shall be reinspected." Agency management stated its goal is to perform reinspection every 3 years. Further, AHERA states, "At least once every 3 years after a management plan is in effect, each [local education agency] shall conduct a reinspection of all friable and nonfriable known or assumed ACBM in each [school] building that they lease, own, or otherwise use as a [school building]."^{16, 17}

We randomly selected 50 field offices that SSA had identified as having asbestos-containing materials and requested reinspection reports (see Appendix C). Based on the information provided by SSA, 23 (46 percent) of the buildings did not require reinspection.¹⁸ Therefore, we did not receive reinspection reports for these buildings. Of the remaining 27 field offices, 18 (36 percent) buildings had timely reinspections, and 9 (18 percent) buildings did not.¹⁹

Chart 1: Asbestos Reinspection Review Results



¹⁵ SSA Asbestos Reinspection Protocol, December 9, 1999.

¹⁶ 40 CFR 763.85.

¹⁷ The acronym ACBM denotes asbestos-containing building material.

¹⁸ SSA reported 10 buildings did not have asbestos-containing materials; 4 buildings had "assumed" asbestos-containing material on the exterior of the building; staffs from 3 buildings were either relocated or scheduled to relocate; and 1 building was a remote hearing site. In addition, five buildings had exclusion letters.

¹⁹ We define a reinspection performed within 3 years and 6 months as timely.

We also requested reinspection reports for the 11 buildings at SSA Headquarters for which GSA delegated operation and maintenance authority to SSA. We determined SSA conducted timely reinspections for 10 buildings in 2003. A reinspection was not required for one building because the asbestos materials that remained in the building were inaccessible.

After our July 2005 discussion with OEHOS staff, we received a revised asbestos inspection protocol. The revised protocol no longer specified a time frame for conducting reinspections. We believe the lack of timely reinspections may pose an increased health risk to SSA's personnel and the public. In addition, the lack of policy specifying time frames to conduct reinspections may cause these reviews to be overlooked. This may increase the risk that conditions involving asbestos go undetected. The Agency should modify its existing Program protocols to identify when to conduct, and specific time periods for conducting, building reinspections. This action would contribute toward ensuring its employees are provided safe and healthful places and conditions of employment, as required by OSHA.

Agency Inspection and Reinspection Protocols Were Inconsistent with Inter-Agency Agreement

The Public Health Service-Federal Occupational Health (PHS-FOH), within the Department of Health and Human Services, conducts initial asbestos inspections and reinspections. PHS-FOH provides this service through an inter-agency agreement. The inspection and reinspection protocols do not address a timeframe

for PHS-FOH to submit inspection and reinspection reports to SSA. The revised asbestos inspection protocol provided by OEHOS staff after our July 2005 discussion states, "FOH shall submit a report detailing the inspection and the findings to OEHOS within four weeks of the completion of the inspection."

Agency Policy Does Not Address Operation and Maintenance Plans Review and Update

During our review, we found SSA's inter-agency agreement with PHS-FOH did not specify a time requirement for PHS-FOH to submit inspection and reinspection reports to the Agency. Without a time requirement for PHS-FOH to submit a report, SSA's actions to address asbestos

management issues could be delayed.

Based on documentation provided, we could not determine whether the operation and maintenance plans were timely reviewed and updated for five field locations nationwide. GSA delegated authority for the operation and maintenance of these buildings²⁰ to SSA. An operation and maintenance plan contains work practices to (1) maintain asbestos-containing materials in good condition, (2) ensure proper clean-up of asbestos fibers previously released, (3) prevent further release of asbestos fibers, and (4) monitor the condition of asbestos-containing materials.

²⁰ The Harold Washington Social Security Center, Mid-Atlantic Program Service Center, Southeastern Program Service Center, Northeastern Program Service Center, and the Western Program Service Center.

We requested operation and maintenance plans for the 16 buildings for which GSA delegated operation and maintenance authority to SSA. We determined the operation and maintenance plans for the 11 buildings at SSA Headquarters were updated in March 2005. For the five field locations, we could not determine whether the operation and maintenance plans had been reviewed and/or updated.

An OEHOS official explained the Agency follows the guidance contained in the Environmental Protection Agency's *Managing Asbestos in Place: A Building Owner's Guide to Operations and Maintenance Programs for Asbestos-Containing Materials*. The guidance recommends Agency asbestos program managers periodically review written operation and maintenance plans to determine whether the plans should be updated. However, SSA did not have written policy specifying when its operation and maintenance plans should be reviewed and updated.

We believe SSA employees and the general public expect periodic reviews and updates of operation and maintenance plans for buildings containing asbestos. Such expectations are reasonable. By developing policy to specify when operations and maintenance plans should be reviewed and updated, the Agency will ensure asbestos management program responsibilities are communicated to SSA personnel and contractors.

**Additional Work Orders
Should Have Been
Selected for Work Site
Monitoring**

During our review, we determined additional work orders should have been selected for OEHOS' work site monitoring. Our November 1999 report recommended that Safety and Occupational Health Specialists²¹ "...monitor work sites in the proximity of asbestos to ensure strict adherence to standard operating

procedures." SSA agreed with our recommendation. However, during our review, SSA did not have written policy for monitoring work sites in the proximity of asbestos.

OEHOS management stated the Agency usually monitors work sites if the following conditions exist:

- a building repair work order has a record number divisible by 10;²²
- a work order is issued for maintenance above the suspended ceiling within 10 feet of the outside perimeter wall of the Altmeyer or Operations Building; or

²¹ As of September 2001, the position description of a Safety and Occupational Health Specialist indicated the employee was responsible for developing and implementing the control/abatement of environmental hazards and resolving health and safety issues for SSA offices nationwide.

²² A record number is an identifier for work orders at Headquarters. The record number is building-specific and resets each calendar year. For example, if Building A had 17 work orders for Calendar Year 2004, the record numbers would be 1 through 17. There is no record of the criteria SSA used to determine why it should flag every work order with a record number divisible by 10.

- the Safety and Occupational Health Specialist chooses a work order for work site monitoring for education/training, general information, or as a precautionary measure.

To test the Agency's work site monitoring practices, we requested a demonstration of the work order preparation and approval process. We also toured OEHOS storage facility.²³ We obtained an automated work order log for Calendar Year 2004 that contained 764 work orders for 11 buildings at SSA Headquarters for which GSA delegated authority for the operation and maintenance to the Agency. We requested all work orders OEHOS selected for work site monitoring during Calendar Year 2004.

Based on the Agency's stated practice of selecting building repair work orders that have a record number divisible by 10, we should have received at least 73 work orders (see Chart 2). However, OEHOS provided us 69 work orders.

Chart 2: Summary of Work Orders from Headquarters Delegated Buildings (Calendar Year 2004)			
Building Name	Calendar Year 2004 Work Orders	Work Orders Having Record Number Divisible by 10	Work Orders Selected for Monitoring
Altmeyer	130	13	10
Annex	116	11	7
East Buildings	49	4	3
Metro West	104	10	10
National Computer Center	91	9	8
Operations	140	14	19
Supply	27	2	4
West Buildings	106	10	8
Miscellaneous Main Complex	1	0	0
TOTALS	764	73	69

The 69 work orders the Agency provided do not meet the first practice we identified. Therefore, if any work orders were selected for the second or third practices we identified, the variance would have been greater. OEHOS management stated they plan to implement a new work order processing system in January 2006.²⁴ An official indicated the new process is intended to improve the management and documentation of the work order process.

²³ We noted the facility appeared to be organized and documents appropriately filed.

²⁴ The new system is called the Drawing Information Management System.

Written policies should decrease the risk of excluding work orders that should be included in OEHOS' work site monitoring efforts. In addition, these policies would provide future managers a tool to ensure monitoring of work sites in the proximity of asbestos is completed to safeguard Agency employees and the public.

Conclusion and Recommendations

While SSA is not statutorily required to have an asbestos management program, it voluntarily adopted some of the provisions contained in AHERA to demonstrate its commitment to safeguarding the health and well-being of employees and the public. We believe SSA's employees and the general public have a reasonable expectation the buildings occupied and visited are safe and healthy. The Agency actions taken were noteworthy; however, opportunities to improve management of its asbestos program exist.

Therefore, we recommend that SSA:

1. Modify its existing Program protocols to identify when to conduct, and time periods for conducting, the required initial inspections and reinspections of buildings.
2. Develop policy to specify when operation and maintenance plans should be reviewed and updated; and to specify when monitoring of work sites in the proximity of asbestos is required.
3. Revise, if appropriate, the inter-agency agreement with the Public Health Service-Federal Occupational Health so that the agreement is consistent with Agency policies.

AGENCY COMMENTS

SSA agreed with our recommendations. The Agency's comments are included in Appendix E.

Other Matter

INCONSISTENT APPLICATION OF ASBESTOS MANAGEMENT STANDARD OPERATING PROCEDURES

GSA delegated authority for the operation and maintenance of 18 buildings to SSA. Of the 18 buildings, 6 were in various locations nationwide (see Appendix B). Of the six buildings, five had asbestos-containing material. These buildings were the Harold Washington Social Security, Southeastern Program Service, Mid-Atlantic Program Service, Northeastern Program Service, and Western Program Service Centers.

According to the facilities' management, the Harold Washington Social Security Center, Southeastern Program Service Center, and Northeastern Program Service Center used the same standard operating procedures that were used to manage asbestos at the delegated authority buildings located at SSA's Headquarters in Maryland. However, these procedures are not used to manage asbestos at the Mid-Atlantic Program Service Center or the Western Program Service Center.

Appendices

Appendix A

Acronyms

AHERA	Asbestos Hazard Emergency Response Act of 1986
CFR	Code of Federal Regulations
GSA	General Services Administration
OEHOS	Office of Environmental Health and Occupational Safety
OSHA	Occupational Safety and Health Act of 1970
PHS-FOH	Public Health Service-Federal Occupational Health
SSA	Social Security Administration

Delegated Authority Buildings

Social Security Administration Headquarters' Buildings in Maryland

- Altmeyer
- Operations
- Annex
- East Low Rise
- East High Rise
- West Low Rise
- West High Rise
- Supply
- National Computer Center
- National Computer Center Utility
- Metro West
- Child Care Center¹

Field Locations

- Harold Washington Social Security Center in Chicago, Illinois
- Southeastern Program Service Center in Birmingham, Alabama
- Mid-Atlantic Program Service Center in Philadelphia, Pennsylvania
- Northeastern Program Service Center in Jamaica, New York
- Western Program Service Center in Richmond, California
- Wilkes-Barre Data Operations Center in Wilkes-Barre, Pennsylvania¹

¹ The Child Care Center and the Wilkes-Barre Data Operations Center do not contain asbestos.

Scope and Methodology

Our objective was to determine the validity of anonymous allegations of mismanagement we received. Specifically, we reviewed the Agency's policies, procedures, and practices used for the administration of its Nationwide Asbestos Management Program.

To accomplish our objective, we:

- Reviewed the Social Security Administration's (SSA) Nationwide Asbestos Management Program policies, procedures and practices and applicable asbestos regulations.
- Reviewed a prior Office of the Inspector General audit report.
- Evaluated and documented the internal controls used by the Office of Facilities Management for managing the Agency's Nationwide Asbestos Management Program.
- Interviewed Office of Facilities Management, Office of Environmental Health and Occupational Safety staff.
- Developed sampling methodology for reviewing initial asbestos inspections, asbestos reinspections, building operations and maintenance plans, and work orders (see Appendix D).
- Observed the Office of Environmental Health and Occupational Safety work area and file storage facility.

We do not possess technical expertise concerning asbestos inspection or removal. As a result, we did not (1) evaluate work performed near work areas that had asbestos-containing materials, (2) inspect sites where asbestos-containing materials had been abated, (3) inspect the location and condition of asbestos-containing materials in any building occupied by SSA or (4) determine the best practices for safeguarding the Agency employees or the public while removing asbestos. In addition, we did not verify whether SSA field personnel were on-site during asbestos abatement. Further, we did not determine if the General Services Administration had asbestos management standards that could be used by SSA.

The entity reviewed was the Office of Facilities Management under the Deputy Commissioner for Finance, Assessment and Management. We performed our evaluation from December 2004 through June 2005 at SSA's Headquarters in Baltimore, Maryland. We performed our evaluation in accordance with the *Quality Standards for Inspections* issued by the President's Council on Integrity and Efficiency.

Sampling Methodology

We developed an estimation plan for our review of the Social Security Administration's (SSA) Nationwide Asbestos Management Program. We requested documentation for initial asbestos inspections, asbestos reinspections, operations and maintenance plans for buildings for which the General Services Administration (GSA) delegated operation and maintenance authority to SSA, and Calendar Year 2004 work orders for buildings located at SSA Headquarters for which GSA delegated that authority to the Agency.

Initial Asbestos Inspections

We requested initial asbestos inspection reports for 50 buildings. We randomly selected these buildings from a population of 1,862 buildings occupied by SSA employees as of January 2005. Of the 50 buildings selected, we found 2 were not scheduled to have initial asbestos inspections completed. These buildings were not scheduled for an initial asbestos inspection because the Office of Environmental Health and Occupational Safety (OEHOS) was not notified about the relocation of SSA staff to these buildings.

Of the 50, we found 48 (96 percent) buildings had an initial inspection for asbestos or the Agency provided an explanation why an inspection did not occur.

Initial Asbestos Inspections

Population size	1,862
Sample size	50
Initial asbestos inspection reports provided	36
Initial asbestos inspections scheduled for 2005	7
Remote hearing sites, training centers, and teleconference centers (not surveyed)	3
OEHOS not properly notified of a relocation	2
Exclusion Letter provided as justification for not conducting an initial asbestos inspection	1
Report pending from the Federal Occupational Health	1

Asbestos Reinspections

We requested reinspection reports for 50 buildings. We randomly selected these buildings from a population of 338 buildings. The 338 buildings were determined by excluding 243 buildings from a list of 581 buildings that at some point contained asbestos. The 243 buildings were excluded because the building "Inspection Date" was

on or after January 1, 2002. OEHOS management informed us the Inspection Date represented the date of the last inspection.

We determined whether SSA conducted timely reinspections for asbestos in accordance with its Asbestos Reinspection Protocol.¹ We allowed an additional 6 months in deciding whether to consider an error for the timeliness of a building's reinspection.

Based on the information provided by SSA, 23 (46 percent) of the buildings did not require reinspection. Therefore, we did not receive reinspection reports for these buildings. Of the remaining 27 field offices, 18 (36 percent) buildings had timely reinspections, and 9 (18 percent) buildings did not.

Asbestos Reinspection Summary

Population Size	338
Sample Size	50
Reinspection reports provided – Reinspection was performed timely	18
Reinspection is "to be scheduled" – Reinspection will not be performed timely	9
Buildings with no Asbestos Containing Materials	10
Exclusion Letter provided	5
Buildings only having Assumed Material Non-Regulated ²	4
No reinspection due to an office relocation or a scheduled office relocation	3
Remote hearing site – Not surveyed according to Agency practice	1

We also requested reinspection reports for the 11 buildings located at SSA Headquarters for which GSA delegated operation and maintenance authority to SSA. We determined SSA conducted timely reinspections for 10 buildings in 2003. A reinspection was not required for one building because the asbestos materials that remained in the building were inaccessible.

Operations and Maintenance Plans

We requested operation and maintenance plans for the 16 buildings for which GSA delegated operation and maintenance authority to SSA. We determined the operation and maintenance plans for the 11 buildings located at SSA Headquarters were updated

¹ SSA Asbestos Reinspection Protocol, December 9, 1999.

² Assumed Material Non-Regulated is a term used to describe material that the Public Health Service assumed to contain asbestos. AHERA, 40 Code of Federal Regulations 763, Subpart E does not require sampling/assuming and assessment of materials external to buildings as being a regulated asbestos-containing material. These materials, while identified in Public Health Service inspection reports are not regulated under the SSA program. Therefore, reinspections of these materials are not required.

in March 2005. For the five field locations, we could not determine whether the operation and maintenance plans had been reviewed and/or updated.

Operations and Maintenance (O&M) Plan Review Results		
Building Name	Did it have an O&M Plan?	When was it last updated?
<i>Headquarters</i>		
Altmeyer	Yes	March 2005
Operations	Yes	March 2005
Annex	Yes	March 2005
East Low Rise	Yes	March 2005
East High Rise	Yes	March 2005
West Low Rise	Yes	March 2005
West High Rise	Yes	March 2005
Supply	Yes	March 2005
National Computer Center (NCC)	Yes	March 2005
NCC Utility	Yes	March 2005
Metro West	Yes	March 2005
<i>Field</i>		
Harold Washington Social Security Center	Yes	Could not determine
Western Program Service Center	Yes	Could not determine
Mid-Atlantic Program Service Center	Yes	Could not determine
Northeastern Program Service Center	Yes	Could not determine
Southeastern Program Service Center	Yes	Could not determine

Work Orders

We obtained an automated work order log for Calendar Year 2004 that contained 764 work orders for 11 buildings located at SSA Headquarters for which GSA delegated operation and maintenance authority to the Agency. We requested all work orders the OEHOS selected for work site monitoring during Calendar Year 2004.

Based on the Agency's practice of selecting building repair work orders having a record number divisible by 10, we should have received, at a minimum, 73 work orders. However, the OEHOS provided us 69 work orders.

Work Orders from Headquarters Delegated Buildings (Calendar Year 2004)			
Building Name	Calendar Year 2004 Work Orders	Work Orders Having Record Number Divisible by 10	Work Orders Selected for Monitoring
Altmeyer	130	13	10
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National Computer Center	91	9	8
Operations	140	14	19
Supply	27	2	4
West Buildings	106	10	8
Miscellaneous Main Complex	1	0	0
TOTALS	764	73	69

In addition to its practice of monitoring every work order with a record number divisible by 10, SSA also indicated it monitors work orders in two other situations.

- If a work order is for maintenance above the suspended ceiling within 10 feet of the outside perimeter wall of the Altmeyer or Operations Building, or
- If the Safety and Occupational Health Specialist chooses to provide work site monitoring for education/training, general information or as a precautionary measure.

We did not determine whether any of the 69 work orders were monitored because of these 2 Agency practices.

Appendix E

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: March 7, 2006

Refer To: S1J-3

To: Patrick P. O'Carroll, Jr.
Inspector General

From: Larry W. Dye /s/
Chief of Staff

Subject: Office of the Inspector General (OIG) Draft Report, "The Social Security Administration's Nationwide Asbestos Program" (A-13-05-21521) -- INFORMATION

We appreciate OIG's efforts in conducting this review. Our comments on the draft report content and recommendations are attached.

Let me know if we can be of further assistance. Staff inquiries may be directed to Candace Skurnik, Director, Audit Management and Liaison Staff on extension 54636.

Attachment:
SSA Response

**COMMENTS ON THE OFFICE OF INSPECTOR GENERAL (OIG) DRAFT REPORT,
“THE SOCIAL SECURITY ADMINISTRATION’S NATIONWIDE ASBESTOS
PROGRAM” (A-13-05-21521)**

Thank you for the opportunity to review and comment on the draft report. We appreciate your conducting this audit of SSA’s Nationwide Asbestos Management Program (Program), and we are pleased that OIG found no mismanagement. The audit did note some areas for improvement in the program. We agree with OIG’s recommendations for improvement and believe implementing these recommendations will have be cost neutral.

Recommendation 1

SSA should modify its existing Program protocols to identify conditions when to conduct, and time periods for conducting, required initial inspections and reinspections of buildings.

Comment

We agree. We will modify the Agency’s existing Program protocols to identify conditions when to conduct, and time periods for conducting, required initial inspections and reinspections of buildings by May 31, 2006.

Recommendation 2

Develop policy to specify when operation and maintenance plans should be reviewed and updated; and specify when monitoring of work sites in the proximity of asbestos is required.

Comment

We agree. We will develop policy to specify when operation and maintenance plans should be reviewed and updated; and specify when monitoring of work sites in the proximity of asbestos is required by May 31, 2006.

Recommendation 3

Revise, if appropriate, the inter-agency agreement (IAA) with the Public Health Service-Federal Occupational Health to be consistent with Agency policies.

Comment

We agree. This recommendation will be addressed and the IAA revised when we review the IAA with Public Health Services-Federal Occupational Health in August 2006. This will ensure program activities comply with the SSA Nationwide Asbestos Management Program.

Appendix F

OIG Contacts and Staff Acknowledgments

OIG Contacts

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Acknowledgments

In addition to those named above:

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