
**OFFICE OF
THE INSPECTOR GENERAL**

SOCIAL SECURITY ADMINISTRATION

**THE PHYSICAL SECURITY OF THE SOCIAL SECURITY
ADMINISTRATION'S CONTRACTOR OWNED AND
OPERATED OFF-SITE STORAGE FACILITY**

September 2012

A-14-12-11227

AUDIT REPORT



Mission

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SOCIAL SECURITY

MEMORANDUM

Date: September 14, 2012

Refer To:

To: The Commissioner

From: Inspector General

Subject: The Physical Security of the Social Security Administration's Contractor Owned and Operated Off-site Storage Facility (A-14-12-11227)

OBJECTIVE

Our objective was to determine whether the physical security at the Social Security Administration's (SSA) contractor owned and operated off-site storage facility for the Second Support Center (SSC) complied with Federal laws, regulations, and contract requirements.

BACKGROUND

Federal standards provide distinct criteria for contingency, continuity of operations, and disaster recovery planning.¹ To help protect SSA's data for contingency processing and disaster recovery purposes, the Agency modified its contract. The total cost of the contract was approximately \$3.5 million.

This contract provides transportation and media vault storage services for the SSC as part of the Agency's Disaster Recovery Program. Under this contract, SSA stores current copies of all procedures, computer programs, operating instructions, and critical

¹ Office of Management and Budget (OMB) Circular A-130, *Security of Federal Automated Information Resources*, Appendix III requires that agencies maintain disaster recovery and continuity of operations plans for all information technology installations should events occur that prevent normal operations at the installation. *Federal Information Security Management Act of 2002*, Pub. L. No. 107-347, Title III, Section 301 § 3544(b)(8), 44 U.S.C. § 3544(b)(8) requires that each agency develop, document, and implement an agency-wide information security program that includes plans and procedures to ensure continuity of operations for information systems that support the operations and assets of the agency. National Institute of Standards and Technology (NIST), p.10, May 2010, Special Publication 800-34 Revision 1, *Contingency Planning Guide for Federal Information Systems*, states disaster recovery plan applies to major, usually physical disruptions to service that deny access to the primary facility infrastructure for an extended period. A disaster recovery plan is an information system-focused plan designed to restore operability of the target system, application, or computer facility infrastructure at an alternate site after an emergency.

data at secure, remote vault facilities maintained by the contractor. SSA also acquired storage services for a Secondary off-site storage facility² as a backup for the SSC Primary off-site storage facility. Until SSA is confident it can back up all critical workloads housed at its SSC to its National Computer Center and from the National Computer Center to the SSC with 1 hour loss of data, the off-site storage facility is critical to SSA's operations. In the event of a catastrophic event at either data center, the Agency would have a backup of its critical workloads.³

To meet our audit objectives, we (1) reviewed and compared physical security criteria for off-site storage facilities to the physical security observed at the contractor's off-site facilities, (2) examined the current contract and modifications; (3) conducted a physical security review of the contractor's Primary and Secondary off-site storage facilities; (4) observed the transport of SSA's media between the SSC and the contractor's Primary and Secondary off-site storage facilities; and (5) interviewed SSA and contractor personnel. The scope of this review was limited to the contract's physical security requirements.

RESULTS OF REVIEW

Based on our audit results,⁴ we determined the physical security at the contractor's off-site storage locations generally complied with Federal laws; regulations; and some, but not all, of the contract requirements. We believe the issues discussed below could have been prevented with improved contract oversight performed by SSA.

During our review, we noted areas where the contractor needed to improve its physical security at its off-site locations to comply with contract requirements. Specifically, we found that the contractor should improve

- access controls to SSA's media;
- environmental controls; and
- fire protection for its Secondary off-site storage facility's vault.

² The Secondary storage facility serves as a form of disaster recovery insurance against an event, or series of events, affecting the National Computer Center, SSC, Primary off-site storage facility, and vehicles transporting SSA media during the same period. This facility will be used to store an older/aged set of media collected under SSA's tape backup procedures.

³ Enumeration and claims administration for benefits and post-entitlements under Titles II and XVI.

⁴ During our audit, we reviewed the physical security criteria for off-site storage facilities, interviewed contractor and SSA management, and observed the contractor's two off-site locations and the process used to deliver SSA's media to the off-site facilities.

Access Controls to SSA's Media

During our review, we found access to SSA's media was not limited to authorized and adjudicated⁵ contractor employees, as required by the contract. This occurred because the contractor did not limit access to SSA's media from other customers' media or only contractor employees who had proper SSA suitability determinations. We discussed these issues with the contractor, which stated that all of its employees needed access to the vaults to service the contractor's other clients.

According to the contract, "The contractor shall provide controlled access to the storage vault/facility."⁶ Also, "...only individuals who have been adjudicated by SSA can have access to the vault where SSA's data is stored."⁷ In addition, the contract required that all contractor employees (truck drivers, contractor management, etc.) who visit an SSA facility obtain a credential⁸ after the Agency conducts a favorable background investigation.

SSA's media is stored in sliding storage cabinets⁹ at both the Primary and Secondary off-site storage vaults. The cabinets are aligned in rows, and each cabinet has vertical slide-out drawers with shelves for media storage. While SSA's media is stored in an individual cabinet, the cabinets are not individually locked. The contractor used a cable to lock each group of cabinets as opposed to locking each cabinet individually. As a result, the contractor's employees can access SSA's cabinets when accessing other customer's cabinets. Furthermore, not all contractor employees who had access to SSA's media had a background check and had been properly adjudicated by SSA.

At the time of our visits,¹⁰ SSA had given only 4 of the 17 contractor employees at the Primary storage facility and 7 of 29 contractor employees at the Secondary storage

⁵ Appropriate background investigations are required for all contractors before they begin work under this contract and/or access SSA systems, information, and facilities. Section E-18, b.

⁶ Section C-4, A. fifth paragraph, first sentence.

⁷ Section C-4, A. fifth paragraph, second sentence.

⁸ For Federal agencies, a credential is a Government-issued card/badge used to prove an individual's identity. SSA issues credentials to employees and contractors whom it determines are suitable. An employee or contractor can use the credential to gain access to a Government facility, computer systems, or information.

⁹ At the time of our review, SSA was storing approximately 3,400 tapes at the Primary storage facility and 2,400 tapes at the Secondary storage facility.

¹⁰ We visited the facilities during the week of January 9, 2012.

facility the appropriate background check.¹¹ In addition, three truck drivers from the Primary storage facility had not received a proper background check and therefore did not get the proper credentials to access SSA's facilities to pick up the Agency's back-up media. However, the four drivers from the Secondary storage facility had received a proper background check but did not have the proper credentials to access SSA's facilities.

As a result, SSA's sensitive media is at risk of loss of confidentiality, integrity, and availability. Therefore, we recommend SSA ensure the contractor stores the Agency's media in individually locked cabinets that can only be accessed by contractor employees who received proper adjudication by SSA.

Environmental Controls

During our review, we found the following environmental control concerns that could subject SSA's media to loss or damage.

1. The contractor may not have been able to timely restore vault temperature and humidity to acceptable levels when environmental readings fall outside the acceptable ranges.
2. The contractor was not able to monitor temperature and humidity levels in the trucks that transported SSA's media.
3. The contractor did not implement safeguards to prevent loss or damage to SSA's media from electronic/radiation threats.¹²

Restoration of Vault Temperature and Humidity Levels

We found that during non-operating hours (11:30 p.m. to 7 a.m.), the contractor relied on a third-party contractor to monitor and report the temperature and humidity levels in the storage vaults. However, when the temperature and humidity levels fell outside acceptable levels,¹³ the contractor was unable to immediately restore the temperature and humidity levels to the required levels.

¹¹ The contractor stated that 16 of its 46 employees worked on SSA's contract, but all 46 employees had access to the vault where SSA's media was stored. The contractor provided a list of all its employees for both of the off-site storage locations and a list of employees who only worked on SSA's contract. In addition to the contractor's lists, we received a list from SSA. However, we could not reconcile these lists; therefore, we used the total employees from the contractor's list.

¹² We consider magnetic threats to be a part of electronic/radiation threats.

¹³ NIST standards require temperature readings to be minimum of 60 degrees Fahrenheit and maximum of 70 degrees Fahrenheit. Also, humidity readings must be 35 percent minimum and 45 percent maximum. The contract allows for a +/- 5 percent variation for temperature and humidity levels.

The contract states that “. . . the facility shall be temperature and humidity controlled in accordance with NIST standards.”¹⁴ Federal standards require that agencies’ media be stored in an environment where temperature and humidity levels must be maintained within a specific range.¹⁵

We discussed this issue with the SSA representatives, who told us the contractor stated that when the temperature and humidity levels are improper, the contractor requests a service visit from a heating, ventilation, and air conditioning vendor at the first opportunity and arranges for the unit to be assessed within 24 hours.¹⁶ However, we are concerned that process could take more than 1 day, thereby exposing SSA’s media to loss or damage.

Transportation of SSA’s Media

We found SSA’s contractor did not implement environmental controls to monitor and record temperature readings in the trucks used to transport SSA’s media to the Secondary storage facility.

According to the contract, the contractor’s trucks should maintain a temperature between 50 and 80 degrees Fahrenheit at all times while carrying cargo.¹⁷ Moreover, the contractor should take daily temperature readings in the cargo area and supply SSA with those readings monthly as part of the required report documentation.¹⁸ Further, the contract requires weekly pick-ups to the Secondary storage facility.

On January 10, 2012, we observed the contractor transporting and receiving SSA’s media from the Secondary storage facility to SSA’s SSC. The temperature on that day was below 50 degrees Fahrenheit. Additionally, the average temperature in the region where the Secondary storage facility is located ranges from a low of 30 degrees Fahrenheit to over 80 degrees Fahrenheit. The contractor must monitor and maintain the temperature and humidity levels in its delivery trucks to protect SSA’s media from extreme cold, heat, or humidity.

We requested the technical proposal the contractor submitted in response to SSA’s Request for Proposal. SSA’s Request for Proposal requires that the delivery truck’s transport area be closed to the driver by a solid wall and securely locked while in use.

¹⁴ Section C-4, B.

¹⁵ National Archives and Records Administration 36 C.F.R., 1236.28 (a) (1) (2).

¹⁶ During operating hours, when temperature and humidity levels are improper, the contractor implements the same process for operating hours to restore readings to normal. According to SSA, the contractor stated the third party heating, ventilation, and air conditioning vendor is required to respond and repair the unit within 4 to 6 hours the same day of the service request.

¹⁷ Section C-4, H.

¹⁸ Id.

In addition, cargo must be kept at 50 to 80 degrees Fahrenheit at all times while it is being transported. Finally, SSA required that the contractor use appropriate equipment to take daily temperature readings in the cargo area and supply these readings each month as part of the required report documentation.

The contractor responded,

We customize our pickup, delivery and tape rotation schedules around your backup requirements and business needs. Your backup media is transported in our environmentally controlled and secure vehicles to one of our vaults. Specially screened and trained personnel ensure your data is protected from contamination, exposure and security threats at all times and daily temperature readings are recorded 24/7. Once a month the temperature gauge is connected to a computer and the recorded readings can be printed out for SSA.

We also reviewed the Evaluation Score Sheet including the Site Visit Checklists the Contracting Officer Technical Representative (COTR) used during the pre-award on-site evaluation to determine whether the transportation vehicles were inspected before the contract was accepted. The COTR gave a “pass” on “Truck/Vehicle Requirements – Temperature Controlled – 50-80 degrees.”

We discussed this issue with the Agency representatives, and, according to these individuals, the contractor stated the Secondary storage facility’s trucks did not have a mechanism to monitor and record daily temperature readings of SSA’s magnetic media during transit. Consequently, the contractor did not meet the contract’s requirements.

It is important that the contractor implement proper environmental controls for its trucks because SSA’s media is sensitive to temperature. Without the proper controls to ensure adequate temperature levels, SSA’s media is at risk of loss or damage and may not function properly when the Agency needs it for disaster recovery. Therefore, we recommend SSA ensure the contractor maintains the proper temperature and humidity levels as specified in the contract at all times while the Agency’s media is in transit and storage. In addition, SSA needs to ensure the contractor’s Secondary storage facility provides the Agency with the required report documentation for delivery truck temperature and humidity readings as specified by the contract.

Protection from Electronic/Radiation Threats

We found the contractor did not protect SSA’s media from electronic/radiation threats. The contract stated that “. . . the contractor shall provide a storage facility that is physically secure from fire, flood, theft, and damage (physical and/or electronic/radiation).”

We requested documentation that demonstrated the contractor’s compliance with this contract clause; however, the contractor could not provide evidence that its storage

facility provided protection from electronic/radiation threats. Further, we discussed this issue with the contractor. The contractor stated that lead sheathing¹⁹ was not installed in the vault walls during construction.

The backup media stored at the off-site facilities are critical for SSA's disaster recovery and continuity of operations. Therefore, we recommend SSA ensure the contractor's storage facility vaults meet the contract requirements for protection from electronic/radiation threats.

Fire Protection for Secondary Storage Facility Storage Vault Needed Improvement

Finally, we found the contractor's storage vault at the Secondary storage facility needed improvement to protect SSA's media from loss or damage due to a fire. The contract requires that the contractor provide a storage facility that is physically secure from fire and all fire doors provide 4 hours or greater protection.²⁰ However, the storage vault at the Secondary storage facility only provided 1.5 hours of fire protection. We discussed our concerns with the contractor who stated that they plan to replace the vault doors with doors having a 3-hour fire protection rating sometime in 2012. While this would be an improvement, the vault doors still would not meet contract requirements.

We requested the technical proposal the contractor submitted in response to SSA's Request for Proposal. Our review of the contractor's technical proposal indicated that the Agency requested vault doors to protect SSA's media from fire for 4 hours or longer. The contractor responded that its ". . . facilities are designed and constructed in accordance with all applicable local and national codes. Specifically, facilities meet all requirements of the local Authorities Having Jurisdiction (AHJ) and National Fire Protection Association (NFPA) standards 13, 25 and 72 at the time the facility was built." We reviewed the NFPA standards 13, 25, and 72 and determined that they do not apply to fire door protection.

We discussed our concerns with the Contracting Officer (CO). The CO stated that the COTR conducted a technical evaluation of the contractor's facilities before award. The COTR documented the evaluation in the Evaluation Score Sheet. The COTR's evaluation indicated that the contractor's vault was rated as "excellent."²¹ We reviewed the Evaluation Score Sheet and determined that the COTR may not have inspected the vault doors and instead relied on the General Services Administration or Underwriters Laboratories certifications during the technical evaluation. Further, the CO replied that

¹⁹ According to contractor, lead sheathing in vault walls deters penetration of magnetic waves.

²⁰ Section C-4, A. paragraph one states, "The contractor shall provide a storage facility that is physically secure from fire, flood, theft, and damage (physical and/or electronic/radiation) for backup/archival storage of SSA's magnetic media."

²¹ According to the Evaluation Score Sheet, "Excellent" means that this area of the proposal far exceeds the minimum requirements of the Request for Proposal. One or more vault(s) have certifications such as General Services Administration or Underwriters Laboratories. Numerous major strengths exist. Weaknesses, if any, are very minor and very few.

“. . . only the most important requirements were inspected; however, the contractor was still required to comply with all contract requirements.” As a result of our review, we recommend SSA ensure the contractor’s Secondary storage facility vault doors meet the contract requirements for fire protection.

SSA Needs to Improve Contractor Oversight

As stated above, we believe SSA could have prevented the issues discussed in this report with improved contract oversight. Agency policy states that the COTR should monitor the contractor’s performance and report progress to the CO.²² Therefore, we recommend SSA improve its oversight of this contract and timely resolve any contract deficiencies with the contractor.

We discussed our concerns with the CO and the current COTR. We were told that the original COTR retired in 2011. In addition, we were told that there were no on-site inspections before 2012, with the exception of the pre-award site inspection. However, the CO stated that because of this review, the contract will be modified in areas that require changes; but the Agency will mostly continue to enforce current requirements. Moreover, the COTR stated that he will work with the contractor to ensure all contractor employees receive the appropriate background checks and credentials.

CONCLUSION AND RECOMMENDATIONS

We determined that the physical security at the contractor’s off-site storage locations generally complied with Federal laws, regulations, and some, but not all, of the contract requirements. However, we noted areas where the contractor could improve the physical security in the areas of access and environmental controls and fire protections of its storage facilities to comply with all contract provisions.

Therefore, we recommend SSA:

1. Ensure the contractor stores the Agency’s media in individually locked cabinets that can only be accessed by contractor employees who received proper adjudication by SSA.
2. Ensure the contractor maintains the proper temperature and humidity levels as specified in the contract at all times while the Agency’s media is in transit and storage.
3. Ensure the contractor’s Secondary storage facility provides the Agency with the required report documentation for delivery truck temperature and humidity readings as specified by the contract.
4. Ensure the contractor’s storage facility vaults meet the contract requirements for protection from electronic/radiation threats.

²² Administrative Instructions Manual System, Technical Support for Acquisitions-The Role of the Contracting Officer’s Technical Representative, Section 06.05.02, B.

5. Ensure the contractor's Secondary storage facility vault doors meet the contract requirements for fire protection.
6. Improve its oversight of this contract and timely resolve any contract deficiencies with the contractor.

AGENCY COMMENTS

SSA agreed with our recommendations. See Appendix C for the Agency's comments.

A handwritten signature in black ink, appearing to read "Patrick P. O'Carroll, Jr.", with a stylized flourish at the end.

Patrick P. O'Carroll, Jr.

Appendices

APPENDIX A – Acronyms

APPENDIX B – Scope and Methodology

APPENDIX C – Agency Comments

APPENDIX D – OIG Contacts and Staff Acknowledgments

Acronyms

AHJ	Authorities Having Jurisdiction
C.F.R.	Code of Federal Regulations
CO	Contracting Officer
COTR	Contracting Officer Technical Representative
NFPA	National Fire Protection Association
Pub. L. No.	Public Law Number
NIST	National Institute of Standards and Technology
OMB	Office of Management and Budget
SP	Special Publication
SSA	Social Security Administration
SSC	Second Support Center
U.S.C.	United States Code

Scope and Methodology

To meet the objectives of our review, we performed the following procedures.

1. Examined the original and current versions of the Social Security Administration's (SSA) off-site storage contracts and modifications.
2. Reviewed applicable Agency contract management policies and procedures.
3. Conducted a physical security review of the contractor's Primary and Secondary off-site storage facilities.
4. Observed the transport of SSA's media between the Second Support Center and the contractor's Primary and Secondary off-site storage facilities.
5. Interviewed SSA and contractor personnel.

We also reviewed the following.

- The *Privacy Act of 1974*, as amended, 5 U.S.C. 552a;
- The *Federal Information Security Management Act of 2002*;
- Office of Management and Budget Circular A-130, *Management of Federal Information Resources*, Appendix III, *Security of Federal Automated Information Resources*, February 8, 1996;
- National Institute of Standards and Technology (NIST), Special Publication (SP) 800-12, *An Introduction to Computer Security: The NIST Handbook*, October 1995;
- NIST, SP 800-53, Revision 3, *Recommended Security Controls of Federal Information Systems and Organizations*, August 2009;
- NIST, SP 800-34 Revision 1, *Contingency Planning Guide for Federal Information Systems*, May 2010;
- General Services Administration, *Federal Specification Modular Vault Systems*, AA-V2737 Amendment-2, October 2006;
- Internal Revenue Service, *Tax Information Security Guidelines for Federal, State, and Local Agencies, Safeguards for Protecting Federal Tax Returns and Return Information*, Publication 1075, October 2007;
- National Archives and Records Administration 36 Codes of Federal Regulations. 1236.28, Subpart C *Additional Requirements for Electronic Records*, November 2009.

We performed our fieldwork at the contractor's two facilities and SSA's Headquarters from September 2011 through March 2012. We audited the off-site facility owner and the Offices of Systems and Budget, Finance and Management. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Agency Comments



SOCIAL SECURITY

MEMORANDUM

Date: September 5, 2012 **Refer To:** SIJ-3

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

From: Dean S. Landis /s/
Deputy Chief of Staff

Subject: Office of the Inspector General Draft Report, "Physical Security of the Social Security Administration's Contractor Owned and Operated Off-site Storage Facility" (A-14-12-11227)—
INFORMATION

Thank you for the opportunity to review the draft report. Please see our attached comments.

Please let me know if we can be of further assistance. You may direct staff inquiries to Amy Thompson at (410) 966-0569.

Attachment

**COMMENTS ON THE OFFICE OF THE INSPECTOR GENERAL DRAFT REPORT,
“PHYSICAL SECURITY OF THE SOCIAL SECURITY ADMINISTRATION’S
CONTRACTOR OWNED AND OPERATED OFF-SITE STORAGE FACILITY”
(A-14-12-11227)**

GENERAL COMMENT

Page 8, last paragraph, last 2 sentences read:

“SSA’s media stored at these off-site locations are critical to the Agency’s ability to recover quickly from a catastrophic disaster. The loss or severe damage to these media could significantly delay SSA’s ability to continue operating and serving its customers.”

Comment

Please remove or revise these statements, as it is incorrect to associate quick disaster recovery time with a media tape-based environment. We have essentially eliminated our reliance on tape media for continuity of operations in all but the least likely disaster scenarios. The duplication of data between the National Computer Center and Second Support Center is our primary method of data recovery. During the June 2012 disaster recovery exercise, we demonstrated the ability of each center to support production workloads in a disaster scenario within the Information Technology Operations Assurance Recovery Time Objective and the Recovery Point Objective without using a tape for recovery.

RESPONSES TO THE RECOMMENDATIONS

Recommendation 1

Ensure the contractor stores the Agency’s media in individually locked cabinets that can only be accessed by contractor employees who received proper adjudication by SSA.

Response

We agree.

Recommendation 2

Ensure the contractor maintains the proper temperature and humidity levels as specified in the contract at all times while the Agency’s media is in transit and storage.

Response

We agree with the need to maintain proper temperature. The contractor took steps to ensure temperature control for the cited truck. However, there is an inconsistency in the contract with regard to humidity that we need to address. Under Section C-4, of the Detailed Mandatory Requirements contract titled “Transportation” only requires temperature monitoring, but Section E-11 of the contract, Subsection H, entitled “Deliverables” requires the truck reports to include *both* temperature and humidity readings. Our requirement is for tracking temperature only so we will modify the contract to remove the humidity requirement.

Recommendation 3

Ensure the contractor's Secondary storage facility provides the Agency with the required report documentation for delivery truck temperature and humidity readings as specified by the contract.

Response

We agree with the exception of the humidity readings as noted in our response to Recommendation 2 above.

Recommendation 4

Ensure the contractor's storage facility vaults meet the contract requirements for protection from electronic/radiation threats.

Response

We agree. However, we re-assessed this requirement and determined that the chance of loss of data due to "electronic/radiation threats" is extremely rare. Additionally, we found no regulations mandating this level of protection. Since we determined this requirement unnecessary, we will modify the contract to remove the requirement.

Recommendation 5

Ensure the contractor's Secondary storage facility vault doors meet the contract requirements for fire protection.

Response

We agree. We researched this requirement further, and found that the minimal level of fire protection for a vault door in accordance with the National Archives and Records Administration (NARA) Code of Federal Regulations Title 36, Chapter XII, Subchapter B Records Management, Part 1234 Facility Standards for Records is three hours (class A door). Therefore, we determined the four-hour requirement excessive, and we modified the contract to conform to the NARA regulation. We consider this recommendation closed.

Recommendation 6

Improve its oversight of this contract and timely resolve any contract deficiencies with the contractor.

Response

We agree.

OIG Contacts and Staff Acknowledgments

OIG Contacts

Brian Karpe, Director, Information Technology Audit Division

Grace Chi, Audit Manager

Acknowledgments

In addition to those named above:

Tina Nevels, Auditor

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