OFFICE OF THE INSPECTOR GENERAL

U.S. NUCLEAR REGULATORY COMMISSION
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Audit of NRC's Personal Identity Verification (PIV) Card Access System

OIG-16-A-10
March 7, 2016

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

OFFICE OF THE
INSPECTOR GENERAL

March 7, 2016

MEMORANDUM TO: Victor M. McCree
Executive Director for Operations

FROM: Stephen D. Dingbaum ***/RA/***
Assistant Inspector General for Audits

SUBJECT: AUDIT OF NRC'S PERSONAL IDENTITY VERIFICATION (PIV) CARD ACCESS SYSTEM

Attached is the Office of the Inspector General's (OIG) audit report titled *Audit of NRC's Personal Identity Verification (PIV) Card Access System*.

The report presents the results of the subject audit. Following the March 1, 2016, exit conference, agency staff indicated that they had no formal comments for inclusion in this report.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this memorandum. Actions taken or planned are subject to OIG followup as stated in Management Directive 6.1.

We appreciate the cooperation extended to us by members of your staff during the audit. If you have any questions or comments about our report, please contact me at (301) 415-5915 or Beth Serepca, Team Leader, at (301) 415-5911.

Attachment: As stated

Office of the Inspector General

U.S. Nuclear Regulatory Commission
Defense Nuclear Facilities Safety Board

OIG-16-A-10

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Results in Brief

Why We Did This Review

The Personal Identity Verification (PIV) card is an identification card issued by a Federal agency that contains information unique to each employee and contractor. The main function of the card is to protect and to strengthen the security of both employees' and contractors' information and physical access to secured areas. The Nuclear Regulatory Commission (NRC) utilizes the PIV card to control physical access at its headquarters and its regional offices.

Federal policies require agencies to swiftly revoke physical access rights at termination of employment. NRC must collect and destroy PIV cards from Federal employees and contractors upon termination.

Additionally, some areas within NRC are restricted to certain individuals. Each restricted area has a designated representative who must maintain an up-to-date access list of individuals needing access.

The audit objective was to determine whether NRC's PIV card access system meets its operational requirements, and to assess the effectiveness of the PIV system coordination among offices that have a role in securing NRC's physical access.

Audit of NRC's Personal Identity Verification (PIV) Card Access System

What We Found

NRC's PIV card access system meets its operational requirements and there is some coordination among offices. However, opportunities exist to (1) strengthen processes to ensure a greater percentage of PIV card retrieval upon termination and (2) establish a uniform and effective way for the designated representative to notify security officials of changes to contractor and employee access rights for restricted areas.

PIV cards for terminated contractors and employees are not always retrieved. Despite having a process in place to prepare an employee to terminate from the agency, PIV card retrieval does not always occur, and retrieval procedures have not been established to ensure collection. The Office of the Inspector General identified that of 1,452 terminated PIV cards over a 22-month period (January 2014 through November 2015), approximately 33 percent were not physically collected or retrieved from the terminated contractor or employee. As a result, there is a risk of unauthorized physical access to NRC and other Federal facilities.

In addition, NRC receives inconsistent notification of (1) changes in staff/contractor access rights for restricted areas and (2) a change to the designated representative for a restricted area. Consequently, the potential exists for unauthorized physical access into a restricted area by a contractor or employee who should no longer have access.

What We Recommend

This report makes recommendations to improve the PIV card access system, reduce physical security risk across the agency, and ensure continued compliance with Federal regulations and guidance. Management stated their agreement with the findings and recommendations in this report.

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ABBREVIATIONS AND ACRONYMS

ADM	Office of Administration
COR	Contracting Officer's Representative
FIPS	Federal Information Processing Standards Publication
HSPD-12	Homeland Security Presidential Directive-12
MD	Management Directive
PIV	Personal Identity Verification
NRC	U.S. Nuclear Regulatory Commission
OIG	Office of the Inspector General

I. BACKGROUND

HSPD-12

Homeland Security Presidential Directive-12 (HSPD-12) directed Federal agencies and departments to adopt a common identification standard for all employees and contractors. The Department of Commerce published a mandatory identification standard titled Federal Information Processing Standards Publication 201-2 (FIPS PUB 201-2): Personal Identity Verification (PIV) of Federal Employees and Contractors. FIPS PUB 201-2 contains the minimum requirements for a Federal PIV system that is applicable to all Federal employees and contractors.

NRC's Implementation of the PIV Card

PIV cards provide a standardized credential for personnel identification, building access, and network access for employees and contractors. The card authenticates the individual and authorizes entry into an area relative to the access rights of the individual.

By mid-2011, NRC completed implementation of the Physical Access Controls System at headquarters and the regional offices. The Physical Access Controls System controls physical access to NRC facilities through card readers installed at perimeter entrances and controlled areas. A PIV card is read by the card reader that allows entry into a particular area based upon the individual's assigned access rights.

Access Areas and the Office of Administration

Most staff and contractors are afforded access only to NRC's general access areas; however, some are additionally permitted entry to special access areas based on their specific needs. For example,

- **Limited Access Area**. A limited access area is a controlled area where access is restricted to authorized individuals. A limited access area does not require a specific access clearance.

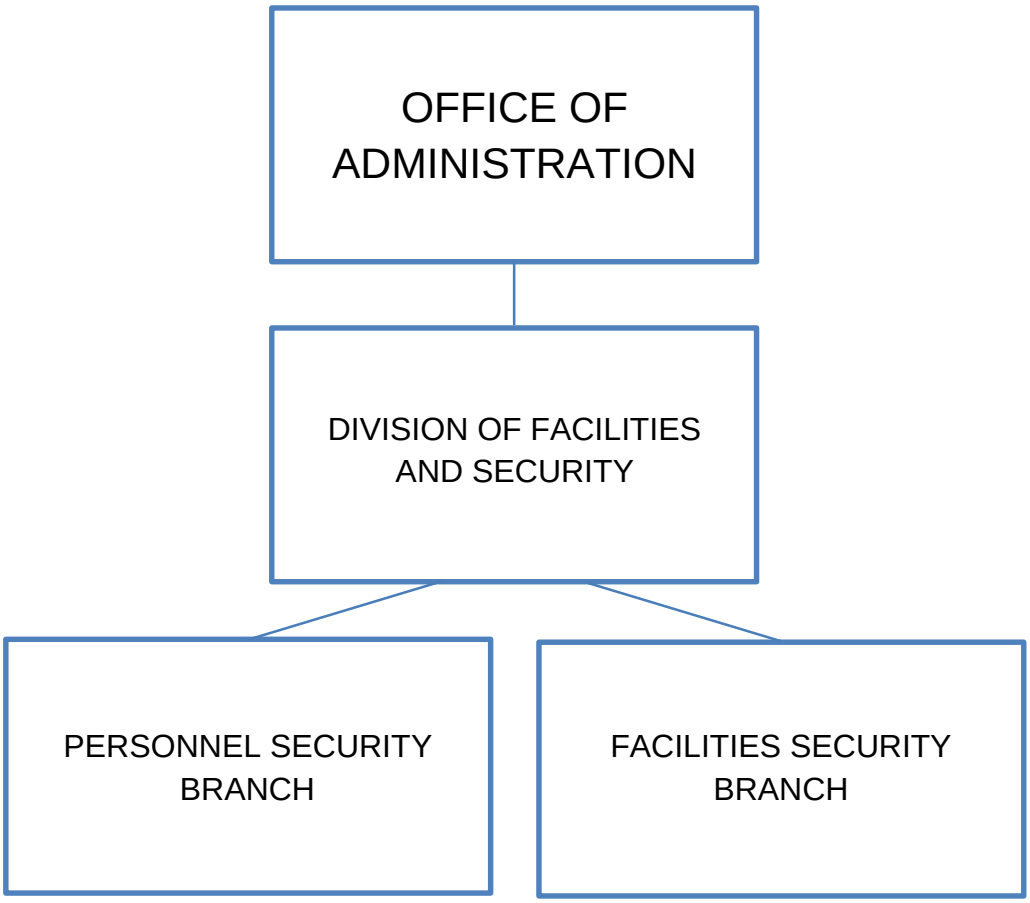
- **Security Controlled Area**. A security controlled area requires a specific access clearance to enter. Individuals must also be approved to be added to the access list.

Figure: PIV Card Reader

Source: Publicly Available Photo

Within the Office of Administration, the Division of Facilities and Security handles the physical and logical credentialing, issuance, and terminations of the PIV card. The Division of Facilities and Security includes the Personnel Security Branch and Facilities Security Branch. The Personnel Security Branch provides credentialing services through validation of an application and adjudication of credentials before issuance. The Facilities Security Branch is responsible for issuing the PIV card to NRC employees and contractors, collecting terminated PIV cards, and maintaining the rosters for authorized access in NRC areas. Figure 2 is a diagram of these entities.

Figure 2: Diagram of NRC Offices Responsible for Handling PIV Cards



Source: OIG.

Return of a PIV Card

Each PIV card is considered Federal property and must be returned upon leaving or terminating from NRC. When an employee terminates, NRC conducts a termination briefing to inform the individual of his or her continuing security responsibilities. During this briefing, employees are advised of the requirement to physically return their PIV card. Sometimes this briefing is the same day that the employee physically terminates from NRC, or it can be a few days in advance. Depending upon the timing of this briefing, the PIV card may be collected by the Office of the Chief Human Capital Officer on the employee's last day and returned to the Facilities Security Branch. Otherwise, there are Office of Administration drop boxes for the PIV cards in the NRC lobby for when the employee physically exits the building, or the employee can give the card to a security officer.

Contractors have a different process for PIV card termination and do not go through a security briefing. The Contracting Officer's Representative (COR)[1] must collect the PIV card from a terminating contractor and return it to the Office of Administration. Immediate notification of the pending termination must be sent from the COR to the Division of Facilities and Security and the Office of the Chief Information Officer to remove physical and logical access. The only way these offices will be notified of a contractor termination is from the COR.

[1] A COR performs technical and/or administrative functions after contract award, including ensuring that the contractor obtains security badges for onsite personnel.

II. OBJECTIVE

The objective of this audit was to determine whether NRC's PIV card access system meets its operational requirements, and to assess the effectiveness of the PIV system coordination among offices that have a role in securing NRC's physical access. The report appendix contains information on the audit scope and methodology.

III. FINDINGS

NRC's PIV card access system meets its operational requirements, and there is some coordination among offices that have a role in securing NRC's physical access. However, there are opportunities for improvement. Specifically, PIV card access processes would be improved by

- Strengthening processes to ensure a greater percentage of PIV card retrieval.
- Establishing a uniform and effective way of notifying the Office of Administration, specifically the Division of Facilities and Security, of a change in staff access rights for a limited access or security controlled area and a change in the room owner/access reviewing official.

A. PIV Cards for Terminated Contractors and Employees Are Not Always Retrieved

Federal and NRC policies require that issued PIV cards of terminated contractors and employees be collected and destroyed. However, PIV cards for terminated contractors and employees are not always retrieved. This occurs because management has not developed measures to enforce return requirements. As a result, PIV cards that are not returned to NRC could be misused to gain unauthorized access to NRC and other Federal facilities.

What Is Required

Federal Guidance

Federal standards require agencies that issue PIV cards to collect and destroy these cards from Federal employees and contractors upon termination. A PIV card is terminated when the department or agency that issued the card determines that the cardholder is no longer eligible to have a PIV card. Further, U.S. laws designate officials' identification cards as the property of the U.S. Government and prohibit unauthorized possession and misuse of the cards.

NRC Guidance

NRC Management Directive (MD) 12.1, *NRC Facility Security Program*, states that all NRC badges must be returned to the Division of Facilities and Security upon the termination of an individual's employment or when the badge or pass is no longer needed for access to NRC facilities. Likewise, MD 12.3, *NRC Personnel Security Program,* stipulates that upon termination of access authorization, the employing office at headquarters or the regional office or facility must, at a minimum, arrange for the immediate return of badges, passes, and other forms of official identification to the responsible NRC security point of contact. The NRC sponsoring office or the COR must immediately notify the Division of Facilities and Security in writing when a contractor or employee no longer needs access to NRC facilities.

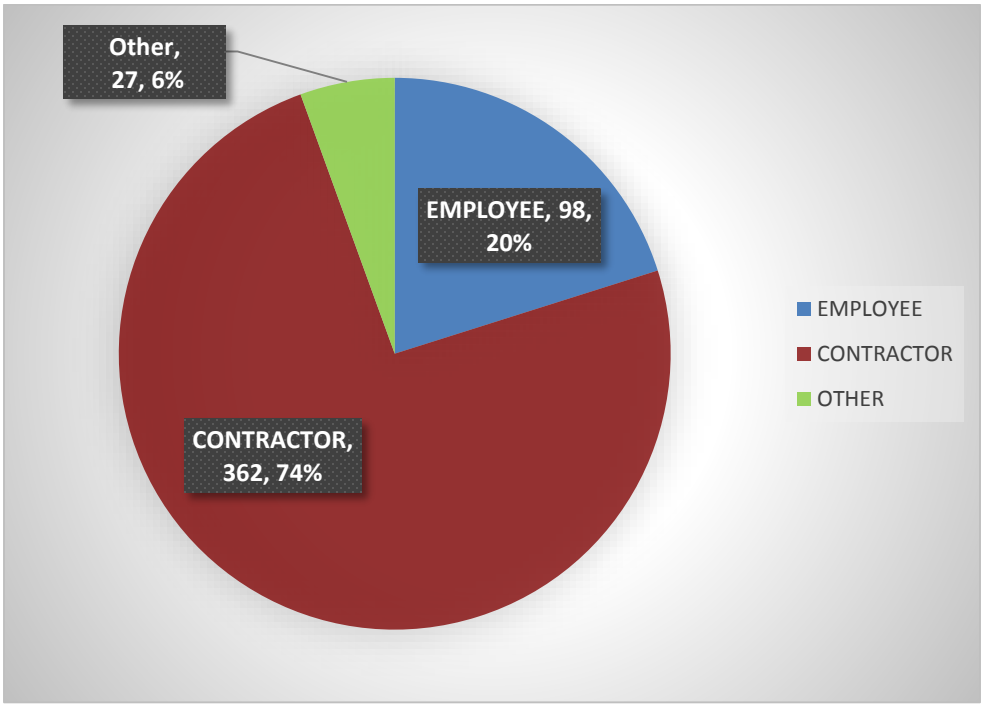
What We Found

PIV Cards Are Not Always Retrieved

NRC does not always retrieve PIV cards for terminated contractors and employees. From January 1, 2014, through November 3, 2015, NRC terminated 1,452 PIV cards. For this time period, 487 of the terminated cards were never recovered by NRC. Of the 487 unrecovered cards, 74 percent were assigned to contractors and 20 percent belonged to employees; it could not be determined for 6 percent of the cards whether

they were assigned to contractors or employees. Figure 3 illustrates this distribution.

Figure 3. Percentage of PIV Cards Not Returned by Personnel Category.



Source: OIG analysis of terminated PIV cards from January 1, 2014, through November 3, 2015.

PIV card retrieval is a longstanding issue for NRC. In January 2007, OIG reported on shortcomings related to badge accountability processes in the *Audit of NRC's Badge Access System*, OIG-07-A-10. The report concluded that badge accountability measures were inadequate and that contractor badges were not always retrieved promptly or deactivated once it was determined that a particular contractor was no longer working for NRC. In response to the report, the Division of Contracts (since renamed the Acquisition Management Division[2]) now includes a clause in all contracts that discusses the requirement for timely completion of contractor security or access application packages. Failure to comply with this requirement may be a basis to cancel the contract for default or entitle

[2] The Acquisition Management Division is a division in the Office of Administration. It directs, coordinates, and performs acquisition functions related to contracts and other financial agreements and obligations.

NRC to recover costs. In addition, failure to return a badge may be a cause for contract cancellation or collection of costs.

Why This Occurred

PIV cards assigned to contractors are not being returned because the agency does not impose a financial consequence for failure to return the card and because CORs are not aware of their responsibilities related to PIV card termination. PIV cards assigned to employees are not always retrieved because management has not developed measures to enforce return requirements.

Contractors Are Not Adhering to PIV Card Return Requirements

Lack of a Financial Consequence for Contractors To Return Their PIV Cards

PIV cards for terminated contractors are not always retrieved because management has not developed measures to enforce return requirements. Specifically, contractor PIV cards are not always returned because there is no financial consequence for not returning the PIV card. The Acquisition Management Division includes a security contract clause that discusses the return of PIV cards and notifying the Office of Administration when the contractor no longer requires physical access. However, contractors are not adhering to the clause.

CORs Are Not Aware of Responsibilities Related to PIV Card Termination

In addition, contractor PIV cards are not consistently returned because CORs do not always notify the Division of Facilities and Security when a contractor no longer requires access. This is because some CORs are not aware of their duty to collect and return terminated PIV cards, despite efforts by the Personnel Security Branch Security to inform CORs of their duty through Town Hall meetings. An NRC manager acknowledged that NRC COR training lacks specifics about notifying CORs of their responsibility for PIV card termination. Another manager stated that CORs may not know when a contractor is terminated, impeding their ability to notify the Division of Facilities and Security of the termination.

In a recent COR town hall meeting, NRC management presented action items related to the process of contractor and employee terminations. Management introduced two forms that CORs are required to complete. One form must be completed when a contractor transfers to work on another NRC contract. The other form must be completed when a contractor terminates from NRC. However, the COR town hall meeting was not mandatory and it cannot be verified that all CORs are aware that these forms exist or that they must complete them.

NRC Lacks PIV Card Retrieval Procedures for Terminated Employees

PIV cards for terminated employees are not always retrieved because management has not developed measures to enforce return requirements. Specifically, NRC's guidance does not outline exact or detailed requirements to collect or account for the PIV cards. In addition, the guidance is silent on procedures for following up with employees who do not return their PIV cards, and does not assign responsibilities for recovering cards from terminated employees.

Why This Is Important

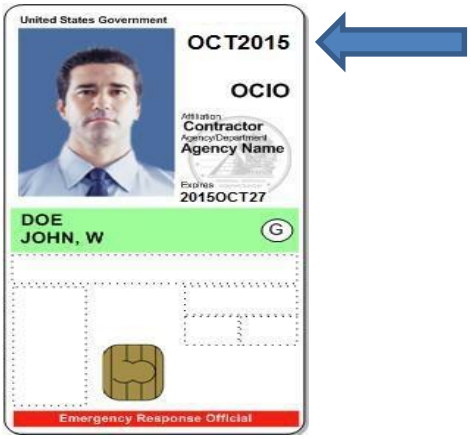
Failure to collect PIV cards from terminated contractors and employees increases the risk of individuals gaining unauthorized physical access to NRC and other Federal facilities, misuse of the card as a form of identification, and cost to the Government.

Failure to collect terminated contractor and employee PIV cards increases the chance that the cards will be used to gain unauthorized access to NRC facilities. While the Office of Administration is likely to be aware, through the exit briefing process, that an employee's PIV card needs to be deactivated even if the actual card is not returned, this is not the case for contractors, who do not undergo the same briefing process. Without physical return of a contractor's PIV card or notification by the COR of the contractor's termination, there may be a span of time when NRC security does not know that a contractor no longer requires access. As a result, the contractor's PIV card remains active and the contractor would still have access to NRC buildings.

Failure to collect PIV cards for terminated NRC contractors or employees poses a potential security risk that the cards could be misused to gain

access to other Federal facilities. Often, the PIV card displays an expiration date, which could allow a terminated contractor or employee access into another Federal facility. This could have a significant impact on that agency's ability to maintain proper protection of its facility. Additionally, the PIV card could be used as identification (as a Government employee) in other public access facilities, such as an airport or hotel.

Figure 4. Sample PIV Card With Expiration Date



Source: Publicly Available Photo.

If PIV cards are not retrieved, it can cost the Government. In July 2014, a former Federal employee pled guilty to engaging in unauthorized access to Government servers that hosted a Fannie Mae Web site used to support Federal mortgage loan modification programs. After being terminated in August 2013, this individual repeatedly used administrator credentials to log into Government servers and make unauthorized changes to a Web site, including disabling one of the Web site's online tools. As a result, the former employee caused damage and loss to the Web site in the amount of $30,000 to $70,000.

Recommendations

OIG recommends that the Executive Director for Operations

1. Require return of contractor PIV cards as part of the contract deliverables.

2. Provide mandatory formal training to all CORs on the process for contractor termination and PIV card retrieval.

3. Develop and implement a PIV card retrieval process, including steps to be taken to retrieve a PIV card from a terminated employee and designating a responsible official to complete those steps.

4. Revise the exit process and/or checklist for terminated employees so that the last office they are in contact with before physically leaving NRC is the Office of Administration.

5. Require the Office of Administration to physically obtain employee PIV cards.

B. Inconsistent Notification to the Office of Administration of Changes in Staff Access Rights and Assigned Room Owner

NRC policies establish guidance on how to manage the physical security of limited and security controlled areas. However, limited and security controlled area room owners do not follow a consistent method to notify the Office of Administration of changes to who should have physical access. This is because NRC does not have effective policies and procedures for the room owners. As a result, the potential exists for unauthorized entry into limited and security controlled access areas.

What Is Required

NRC Policy

MD 12.1: NRC Facility Security Program

MD 12.1 contains guidelines and procedures with regard to facility security, protection of classified information and facilities, safeguarding of NRC property and programs, and administration of the NRC Security Education/Awareness Program and the Security Infraction Program. MD 12.1 defines a security controlled area as a physically defined space containing classified information and subject to physical protection and personnel access controls. Entry into the security areas must not be allowed if such entry, in itself, constitutes improper access to classified information.

Additionally, MD 12.1 defines a controlled area as a space over which NRC or an NRC contractor exercises administrative and physical control by use of properly cleared and authorized employees or guards stationed so as to control admittance to the room, building, structure, or by a lock that provides reasonable protection against surreptitious entry. MD 12.1 states that the Director of the Division of Facilities and Security determines the nature and degree of the minimum controls necessary to establish and maintain controlled areas.

What We Found

Room owners do not have a consistent method to notify the Division of Facilities and Security of a change in staff access control rights and a change in the access reviewing official/room owner.

Staff access control rights refers to whether a staff member's PIV card grants them access to a security controlled or limited access area. For security controlled and limited access areas, there is an access reviewing official who, in conjunction with the Division of Facilities and Security, maintains a current list of those individuals who have access. The access

reviewing official is also referred to as the "room owner." The room owner is responsible for submitting and making changes to access rosters. At NRC headquarters, there are 47 limited access areas and 19 security controlled areas. OIG interviewed a sample of room owners of limited and security controlled rooms at headquarters. Room owners were asked to specify which process they used to notify the Office of Administration of a change in staff access control rights. Table 1 demonstrates that room owners do not have a consistent method of notifying the Division of Facilities and Security of any changes in access control rights.

Table 1. Process Used To Notify of Change in Staff Access Rights

Response	Count	Percentage
Email with a spreadsheet	3	25%
Email with individual's name	5	41.7%
Email with memorandum	2	16.7%
SharePoint	1	8.3%
Unsure	1	8.3%
Total:	12	100%

Source: OIG.

In addition, room owners do not have a consistent method of notifying the Division of Facilities and Security if there is a change in the room owner. The division advised that they often rely on Yellow Announcements to learn that a room owner has left NRC or taken a new position within the agency. NRC Yellow Announcements state a variety of agency events and news, including changes in NRC management.

Why This Occurred

Memorandum Not Distributed

In 2014, the Division of Facilities and Security issued a memorandum titled "Revised Process for Managing Access to Limited and Security Controlled Areas," requesting all offices to comply with the revised process for updating access to limited access controlled areas and security controlled areas.

The memorandum

- Instructed room owners to request changes to access rights for limited access areas and security controlled areas via the Facilities Security Branch SharePoint Web site.

- Requested that all room owners submit an "Access Reviewing Official Nomination" memorandum, selecting two employees to be designated as Access Reviewing Officials.

- Requested that room owners transfer the names of all personnel who are authorized to enter into a limited or security controlled area onto a spreadsheet that was enclosed.

Although the Division of Facilities and Security developed this document, it was not distributed to all room owners or to the regional offices. Furthermore, room owners notify the division of staff access rights changes via any communication method of their choice and the division does not enforce the preferred method of SharePoint as outlined in the memorandum.

No Policies/Procedures for Limited Access Areas

In addition, for limited access areas there is no policy or procedure for room owners to notify the Division of Facilities and Security of a change to the appointed room owner or for notifying the division of a change in staff access rights. However, security controlled areas have specific security plans for each area/room. Per the security plan, the room owner is "responsible for maintaining a current, accurate, authorization list." If any changes are made to the access list, the room owner must notify the Division of Facilities security, who will then make the appropriate changes in the Physical Access Control System.

Why This Is Important

Without a consistent method to notify the Division of Facilities and Security of a change in staff access rights, there is a risk of unauthorized entry into a limited or security controlled area. The Division of Facilities and Security relies entirely on the room owner to notify them if someone should no

longer have access. This allows them to maintain a current roster of who should have access to the area and to correspondingly update the Physical Access Control System. For example, the Physical Access Control System must be updated if an employee transfers from an NRC office that is designated as a limited access area to another NRC office. Moreover, the system must be updated if an employee's duties no longer require their access to a security controlled area. The room owner is aware of these changes and is obligated to advise the Division of Facilities and Security.

Additionally, without a procedure to notify the Division of Facilities and Security of a change to the person designated as the room owner, there is also the potential for unauthorized entry into a limited or security controlled area. Given that the 2014 memorandum was not distributed effectively, there is no procedure in place for a room owner to notify the Division of Facilities and Security that he or she will no longer be serving as the appointed room owner. Also, a second room owner for each area was never designated. Therefore, the potential exists that there may be a period of time when no one is designated as the room owner and no one is accessing the SharePoint site to advise the division of a change in staff access rights.

Recommendations

OIG recommends that the Executive Director for Operations

6. Revise MD 12.1 to include standards for offices to appoint room owners and notify the Office of Administration of changes to access rights for limited access areas.

7. Reissue the "Revised Process for Managing Access to Limited and Security Controlled Areas" memorandum to all relevant offices, including the regional offices, and include language which requires the offices to notify the Office of Administration of a change to the appointed room owner.

IV. CONSOLIDATED LIST OF RECOMMENDATIONS

OIG recommends that the Executive Director for Operations

1. Require return of contractor PIV cards as part of the contract deliverables.

2. Provide mandatory formal training to all CORs on the process for contractor termination and PIV card retrieval.

3. Develop and implement a PIV card retrieval process, including steps to be taken to retrieve a PIV card from a terminated employee and designating a responsible official to complete those steps.

4. Revise the exit process and/or checklist for terminated employees so that the last office they are in contact with before physically leaving NRC is the Office of Administration.

5. Require the Office of Administration to physically obtain employee PIV cards.

6. Revise MD 12.1 to include standards for offices to appoint room owners and notify the Office of Administration of changes to access rights for limited access areas.

7. Reissue the "Revised Process for Managing Access to Limited and Security Controlled Areas" memorandum to all relevant offices, including the regional offices, and include language which requires the offices to notify the Office of Administration of a change to the appointed room owner.

V. AGENCY COMMENTS

An exit conference was held with the agency on March 1, 2016. Prior to this meeting, after reviewing a discussion draft, agency management provided comments that have been incorporated into this report, as appropriate. As a result, agency management stated their general agreement with the findings and recommendations in this report and opted not to provide formal comments for inclusion in this report.

Appendix

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The audit objective was to determine whether NRC's PIV card access system meets its operational requirements and to assess the effectiveness of the PIV system coordination among offices that have a role in securing NRC's physical access.

Scope

The audit focused on NRC's physical access controls using the PIV card. This audit did not focus on logical access to NRC's network or systems using the PIV Card. OIG conducted this performance audit from September 2015 to January 2016 at NRC headquarters (Rockville, MD). Internal controls related to the audit objectives were reviewed and analyzed. Throughout the audit, auditors were aware of the possibility of fraud, waste, and abuse in the program.

Methodology

OIG reviewed relevant Federal criteria for this audit, including

- HSPD-12: Policy for a Common Identification Standard for Federal Employees and Contractors.
- Federal Identity Policies Standard (FIPS) 201, Revision 2, Personal Identity Verification (PIV) of Federal Employees and Contractors.
- National Institute of Standards and Technology (NIST) 800 Special Publication 116.
- Office of Management and Budget (OMB) Memorandum M-11-11, "Continued Implementation of HSPD-12 Policy for a Common Identification Standard for Federal Employees and Contractors."

To understand how NRC implements HSPD-12 and other Federal guidance, OIG reviewed additional internal documents, including:

- Management Directive and Handbook 12.1, "NRC Facility Security Program."
- Management Directive and Handbook 12.3, "NRC Personnel Security Program."
- NRC internal presentation on HSPD-12.
- Security Plan for Region I, Region II, Region III, and Region IV.

OIG interviewed NRC staff and management to gain an understanding of the roles and responsibilities related to PIV card access and coordination among offices that have a role in securing physical access. In addition, auditors interviewed personnel from the Office of Administration, the Office of the Chief Information Officer, Region I, Region II, Region III, Region IV, and the Technical Training Center. OIG auditors also attended a COR town hall Meeting in November 2015.

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 that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit was conducted by Beth Serepca, Team Leader; Kristen Lipuma, Audit Manager; Ziad Buhaissi, Senior Auditor; Felicia Silver, Auditor; and Janelle Wiggs, Auditor.

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COMMENTS AND SUGGESTIONS

If you wish to provide comments on this report, please email OIG using this link.

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