



Review of Access Control Measures at EXIM Headquarters



OIG-SR-24-01
November 13, 2023

Office of Inspector General
Export-Import Bank of the United States



MEMORANDUM

To: Courtney Chung, Senior Vice President and Chief Management Officer

From: Michael T. Ryan, Assistant Inspector General, Special Reviews and Communications

MICHAEL
RYAN Digitally signed by
MICHAEL RYAN
Date: 2023.11.13
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Subject: Review of Access Control Measures at EXIM Headquarters (OIG-SR-24-01)

Date: November 13, 2023

This final report presents the results of a special review of the access control measures at EXIM's headquarters building. OIG conducted this review to determine the effectiveness of those controls to prevent unauthorized access, safeguard EXIM personnel and resources, and ensure personnel accountability in the event of an emergency at EXIM headquarters.

This review was conducted in accordance with the 2020 *Quality Standards for Inspection and Evaluation* as issued by the Council of Inspectors General on Integrity and Efficiency. Those standards require that we plan and perform the review to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our review objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions.

This report contains three recommendations. We consider management's proposed actions to be responsive. The recommendations will be closed upon completion and verification of the proposed actions.

We appreciate the cooperation and courtesies provided to this office throughout this review. If you have questions, please contact me at (202) 565-3963 or michael.ryan@exim.gov.



**Office of Inspector General
Export-Import Bank of the United States**

OIG-SR-24-01

What OIG Reviewed

The Office of Inspector General (OIG) reviewed the access control measures at the Export-Import Bank of the United States (EXIM) headquarters building. OIG conducted this review to determine the effectiveness of those controls to prevent unauthorized access, safeguard EXIM personnel and resources, and ensure personnel accountability in the event of an emergency at EXIM headquarters.

What OIG Recommends

OIG issued three recommendations to improve the effectiveness of the access control measures at EXIM headquarters. In its comments on the draft report, EXIM concurred with all three recommendations. EXIM's response to each recommendation, and OIG's reply, can be found in the Recommendations section of this report. EXIM's formal response is reprinted in its entirety in Appendix B.

SUMMARY OF REVIEW

**Review of Access Control Measures at EXIM
Headquarters
November 13, 2023**

What OIG Found

OIG reviewed the access control measures in place at EXIM headquarters building (i.e., the historic Lafayette Building located at 811 Vermont Avenue, NW, Washington, DC 20571) to assess the effectiveness of those controls to prevent unauthorized access, safeguard EXIM personnel and resources, and ensure personnel accountability in the event of an emergency at EXIM headquarters.

OIG found that EXIM lacked full authority over the facility access control measures at EXIM headquarters. There are four federal agencies, including EXIM, that share responsibility for physical security at EXIM headquarters. However, according to EXIM officials, these agencies have differing perspectives and priorities about what security and life-safety controls and measures are necessary at the facility.

OIG also found that the turnstiles at EXIM headquarters, as configured, did not accomplish their intended purpose of providing effective life-safety precautions and (b) (7)(F) at EXIM headquarters. Finally, OIG found that staffing limitations in the Office of the Chief Management Officer may have hindered EXIM's effective management of safety and security measures at EXIM headquarters.

During this review, OIG identified additional questions and concerns regarding the adequacy of the physical security controls and life-safety measures at EXIM headquarters. OIG did not evaluate these additional questions and concerns as they were outside the scope of this review. However, OIG will notify EXIM leadership of these concerns so that EXIM leadership may take appropriate action.

OIG made three recommendations to EXIM leadership to address the issues raised in this report.

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OBJECTIVE

The Export-Import Bank of the United States (EXIM) Office of Inspector General (OIG) conducted this review to assess the effectiveness of the access control measures at EXIM headquarters building to prevent unauthorized access, safeguard personnel and resources, and ensure personnel accountability in the event of an emergency at EXIM headquarters (i.e., the historic Lafayette Building located at 811 Vermont Avenue, NW, Washington, DC 20571).¹ An image of the headquarters building is presented in Figure 1, below.

Figure 1: Photograph of the Lafayette Building



Source: General Services Administration.

BACKGROUND

A priority of the U.S. Government is to ensure the safety and protection of federal employees and private citizens who work within and visit government-owned and leased facilities.² EXIM issues all employees Personal Identity Verification (PIV)-cards that employees must use to enter EXIM headquarters at various access points. When OIG started this review, staff observed

¹ EXIM was founded in 1934 as an independent federal agency that promotes and supports American jobs by providing competitive and necessary export credit financing to help U.S. companies compete for global sales through loan guarantee, direct loan, and insurance programs. EXIM OIG is an independent office within EXIM. EXIM OIG's mission is to promote the integrity, transparency, and efficiency of EXIM programs and operations by conducting and supervising audits, investigations, inspections, evaluations, and special reviews related to EXIM programs and operations, and preventing and detecting fraud, waste, abuse, and mismanagement.

² Adapted from [Armed Contract Security Officers in Federal Facilities: An Interagency Security Committee Best Practice \(2019\)](https://www.cisa.gov) (www.cisa.gov) (last visited August 28, 2023)

employees not using their PIV-cards consistently at PIV-controlled turnstile access points. OIG conducted this review to determine whether EXIM employees' inconsistent use of their PIV-cards at EXIM headquarters (b) (7)(F) and impacted life-safety protections.³ In conducting this review, OIG focused primarily on the main lobby PIV-controlled turnstiles at EXIM headquarters because the secondary entrance and exit doors and garage access points at EXIM headquarters either lack PIV-controlled systems or do not have functional PIV-controlled systems.⁴ This report sets forth OIG's findings and recommendations, and additional concerns identified during our review.

FINDINGS

Finding 1: EXIM Lacked Full Authority for Access Control Measures at Its Headquarters

OIG found that EXIM lacked complete authority over the physical access controls at EXIM headquarters building. According to multiple EXIM officials, four federal agencies—including EXIM—share responsibility for physical security at EXIM headquarters. Specifically, another federal agency is the lead tenant at EXIM headquarters and therefore has primary responsibility for the security guards and building access turnstiles at EXIM headquarters.⁵ Yet another federal agency provides the security guards and, according to an EXIM official, in coordination with the lead tenant, issues orders regarding the building's physical security.⁶ Additionally, an EXIM official said the building landlord is responsible for ensuring any recommended upgrades are completed, even if the tenant agencies must fund the project.

According to EXIM officials, not only do these four agencies have differing responsibilities for physical security at EXIM headquarters, but they also have differing perspectives and priorities about what security and life-safety controls are necessary at EXIM headquarters. EXIM officials

³ By life-safety protections, OIG means controls and measures that safeguard EXIM personnel and resources and ensure personnel accountability in the event of an emergency.

⁴ According to the National Institute of Science and Technology (NIST) Special Publication 800-116 (Revision 1), the purpose of a PIV-card controlled Physical Access Control System (PACS) (e.g., turnstiles) is so that "any PIV Card can provide verification of identity to the PACS (access is granted only if the identity is so authorized)." OIG notes that the absence of PIV-controlled systems at the garage access points and the presence of non-functional PIV-controlled systems at the secondary entrance and exit doors at EXIM headquarters undermines the intended purpose of the main lobby turnstiles.

⁵ Documents obtained by OIG indicate that the EXIM Headquarters building consists of approximately 466,832 rentable square feet. As of September 2023, EXIM occupied approximately 37 percent of the rentable square feet of the building and paid fees to the federal agency that provides security guards at EXIM Headquarters based on that percentage. An EXIM official advised that the lead tenant is the only other federal agency in the building and occupies the remaining rentable percentage of the building square footage. The EXIM official also advised the lead tenant pays fees for the security guards based on their percentage of the rentable building square footage.

⁶ An EXIM official advised that the security guards are the "first line" of functional security for the building. The agency providing the security guards also designates the level or security "tier" that federal buildings are measured against and assesses whether these buildings are compliant with mandated life-safety and security requirements.

told OIG they have regular contact with their peers at these agencies but there is no group of senior-level decision makers from the four agencies that meet regularly to reach a consensus on common priorities for EXIM headquarters. One EXIM official suggested that having a monthly working group comprised of senior-level decision makers from the four agencies could ensure they are “synchronized” in their approach to projects by engaging in constructive, consistent discussions with decision makers present.

For example, multiple EXIM officials said there are significant functionality issues with the turnstiles (i.e., non-functional turnstiles, lack of turnstiles at select access points, turnstile usage data not readily accessible to EXIM) but they lacked the authority to address those issues without the lead tenant’s concurrence and funding.⁷ EXIM officials told OIG the lead tenant’s funding for such upgrades would be commensurate with the lead tenant’s percentage of the building occupancy.⁸ An EXIM official also said that in terms of security of the building, EXIM has no role in the coordination between the lead tenant and the agency providing security guards at EXIM headquarters.

Finally, EXIM officials said the elevators in EXIM headquarters are out of date and sometimes break down, trapping employees. The building landlord is responsible for upgrading the elevators. An EXIM official said EXIM has been requesting an elevator upgrade for several years but the building landlord did not prioritize the elevator replacement project until late 2022.⁹ OIG includes this reference to the EXIM headquarters elevators, even though this review focused on external access controls, because EXIM officials told OIG that they want PIV-card readers installed at the elevator banks, which will control who is able to access certain floors. However, the installation of PIV-card access controls at the elevators as part of the elevator project is not confirmed.

Notwithstanding EXIM’s status as a minority building tenant, the agency has an obligation¹⁰ to ensure the safety and security of EXIM employees and stakeholders conducting business in the headquarters building. Effective safety and security protections are especially critical given the facility’s proximity to the White House and other federal office buildings. In the absence of an effective physical security program at EXIM headquarters, EXIM employees, other federal

⁷ EXIM officials also told OIG they would like to install additional external closed-circuit television (CCTV) cameras at EXIM headquarters but lack the ability to do so without the lead tenant’s concurrence and funding.

⁸ Specifically, the lead tenant’s share of funding for such upgrades would be commensurate with their percentage of the building square footage. Although EXIM occupies approximately 37 percent of the building square footage, EXIM funded the full cost (estimated at \$238,925) for the turnstiles installed at EXIM headquarters in early 2017.

⁹ An EXIM official said that the building landlord has agreed to fund the replacement of the elevators and estimated the project will be completed in the next two to five years. EXIM officials said they also attempted to incorporate additional internal CCTV cameras and floor-by-floor PIV-card controlled glass doors to address life-safety and security concerns but could not do so without the building landlord’s approval and funding. In addition, an EXIM official said a PIV-card reader installed in (b) (7)(F) is malfunctioning due to water infiltration. The card reader has yet to be repaired.

¹⁰ Adapted from [Armed Contract Security Officers in Federal Facilities: An Interagency Security Committee Best Practice \(2019\)](#) (www.cisa.gov) (last visited August 25, 2023)

employees, and private citizens who work with EXIM stakeholders are at increased risk from external and internal threats.

Recommendation 1: EXIM’s Chief Management Officer, in coordination with the Vice President for the Administrative Services Division, should spearhead the establishment of an interagency working group with key stakeholders to address physical access controls, including EXIM’s lack of authority for physical access controls, as well as other life-safety and security issues the group may identify at EXIM headquarters.

Finding 2: Headquarters Turnstiles Did Not Accomplish Their Intended Purposes

OIG found that the turnstiles at all ingress and egress access points in EXIM headquarters did not accomplish their intended purpose.¹¹ Specifically, EXIM officials told OIG that the purpose of the main-lobby turnstiles is to provide life-safety protections by allowing EXIM officials to determine who is in the building in the event of an emergency. EXIM officials also told OIG that the main-lobby turnstiles provide (b) (7)(F) who inspect and physically touch PIV-cards when an employee enters the interior building space and screen visitors.¹²

However, OIG determined that the turnstiles are not functioning as intended for several reasons. Specifically, the turnstiles in the secondary entrance are not functional and there are no functional PIV-card controlled access points in the garage.¹³ Also, EXIM employees do not use the main lobby turnstiles consistently.¹⁴ EXIM’s current building security policy does not mandate that EXIM employees use their PIV-card at the main lobby turnstiles.¹⁵ To address this policy gap, EXIM’s Administrative Services Division Security Office issued an email directive in October 2022 to EXIM employees mandating that employees use their PIV-cards at the turnstiles.¹⁶ OIG’s main lobby observations confirmed that, on the days of observation, the

¹¹ National Institute of Science and Technology (NIST) Special Publication 800-116 (Revision 1) provides that the purpose of a PIV-card controlled Physical Access Control System (PACS) (e.g., turnstiles) is so that “any PIV Card can provide verification of identity to the PACS (access is granted only if the identity is so authorized).”

¹² The agency that provides the security guards at EXIM headquarters issued a directive requiring the guards to check and touch each employee’s IDs 100 percent of the time as part of the security screening process.

¹³ The turnstiles at the secondary entrance are not functional because the lead tenant deactivated the turnstiles from their system in 2015. EXIM officials told OIG that they have requested that the lead tenant “turn on” these turnstiles, but the lead tenant has not done so.

¹⁴ OIG observed that not all employees use the turnstiles consistently when OIG conducted an in-person sampling of turnstile usage in EXIM headquarters lobby from May to June 2023.

¹⁵ EXIM’s 2011 Security Policy (Building Security Policy RM-2010-4) governs building security for EXIM employees. EXIM is revising the 2011 policy and anticipates disseminating the updated policy later this year. However, the date to finalize the policy remains undefined. EXIM provided OIG with the most recent version of the draft policy. The draft policy includes updated language that requires EXIM employees use their PIV-card at the turnstiles.

¹⁶ EXIM officials advised that a possible impediment to the enforcement of the mandate for employees to use their PIV-cards at the turnstiles is EXIM’s employee culture. Specifically, EXIM officials said that many EXIM employees

majority of employees did not follow the mandatory PIV-card usage email directive. Despite ongoing efforts to update the 2011 EXIM Building Security Policy, an EXIM official indicated no knowledge of any proposed plan to require EXIM employees to use their PIV-cards at the turnstiles other than the pending issuance of the revised security policy.¹⁷

Moreover, the turnstile data that EXIM could use in an emergency to determine who is in the building is not readily accessible. EXIM officials stated that the turnstile data resides on the lead tenant agency's IT systems. Since the turnstile data resides outside EXIM systems, an EXIM official said that using the data requires accessing it from the lead tenant's system, copying it onto a thumb drive, transferring it to EXIM's computer system, printing it, and then checking off EXIM employees manually once they have evacuated from the building and gathered at previously identified muster stations. One EXIM official said this process would take too long in an emergency. Also, as set forth above, employees are not using the turnstiles consistently, so the data collected by the turnstiles may be inaccurate and therefore insufficient for life-safety purposes.

Figure 2: Photograph of Lobby Security Signs



Source: OIG.

Further, EXIM officials advised, and OIG observed, that some turnstiles have functionality issues—such as (b) (7)(F)

Moreover, an EXIM official indicated (b) (7)(F) the “ID-touch” procedure required by the security directive (See Figure 2, above). The same EXIM official said (b) (7)(F) the “ID-check” procedure (b) (7)(F).

In sum, the turnstiles at EXIM headquarters do not accomplish their intended purpose of providing effective life-safety precautions and (b) (7)(F), resulting in negative life-safety and (b) (7)(F) potentially becoming a reality.

appear to perceive using PIV-cards at the turnstiles as a form of “micromanaging” or a “Big Brother” management style.

¹⁷ EXIM officials said that all new EXIM employees are supposed to be advised in new employee orientation sessions of the requirement to use their PIV-cards at turnstile entrances when entering and exiting EXIM headquarters.

Recommendation 2: EXIM’s Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should develop an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.

Recommendation 3: EXIM’s Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should finalize the updated EXIM Building Security Policy and ensure the final version of the revised Policy mandates EXIM employee use of the turnstiles at EXIM headquarters.

Finding 3: Staffing Limitations May Have Hindered Safety and Security Measures

Staffing limitations in EXIM’s Office of the Chief Management Officer (OCMO) may have impacted EXIM’s management of physical safety and security measures at its headquarters. EXIM officials told OIG that there is a staffing shortfall in the OCMO Administrative Services Division. EXIM officials stressed that this resource deficit is notable regarding the number of subject matter experts employed to manage and address life-safety and security matters.¹⁸ Due to staffing limitations and other perceived Administrative Services Division resource gaps, EXIM officials told OIG that the division is solely focused on day-to-day operational needs, to the detriment of life-safety and security priorities. Indeed, one senior EXIM official said that EXIM is not “adequately and consistently” prioritizing physical safety and security measures at EXIM headquarters and should benchmark its approach to security against similarly situated agencies.

OIG is not making a recommendation on this topic because staffing considerations were outside the scope of this review. However, OIG is raising the issue to agency leadership because EXIM officials cited potential life-safety and security risks associated with the perceived staffing deficiency.

Other Physical Security Concerns Identified by EXIM Officials and OIG

During this review, EXIM officials and OIG identified additional questions and concerns regarding the adequacy of physical security and life-safety measures at EXIM headquarters that may warrant further consideration by EXIM leadership. OIG did not evaluate these additional questions and concerns as they were beyond the scope of this OIG review. However, OIG will advise EXIM leadership of these concerns so that EXIM leadership may take appropriate action.

¹⁸ For example, an EXIM official advised that the original position description for the vacant Vice President of the Administrative Services Division did not include sufficient subject matter expertise in security, even though this position has overall responsibility for EXIM security. At the time of this review, EXIM officials told OIG that EXIM is revising the position description to include additional security subject matter expertise.

RECOMMENDATIONS

OIG provided a draft of this report to EXIM stakeholders for their review and comment on the findings and recommendations. OIG issued the following recommendations to EXIM. The agency's complete response can be found in Appendix B.

Recommendation 1: EXIM's Chief Management Officer, in coordination with the Vice President for the Administrative Services Division, should spearhead the establishment of an interagency working group with key stakeholders to address physical access controls, including EXIM's lack of authority for physical access controls, as well as other life-safety and security issues the group may identify at EXIM headquarters.

Management Response: In its November 1, 2023, response, EXIM concurred with the recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that EXIM has reestablished the Facility Security Committee for the Lafayette Building to ensure a holistic approach to addressing the physical access and the other security related matters/issues identified in this report.

Recommendation 2: EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should develop an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.

Management Response: In its November 1, 2023, response, EXIM concurred with the recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that EXIM has developed an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.

Recommendation 3: EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should finalize the updated EXIM Building Security Policy and ensure the final version of the revised Policy mandates EXIM employee use of the turnstiles at EXIM headquarters.

Management Response: In its November 1, 2023, response, EXIM concurred with the recommendation.

OIG Reply: OIG considers the recommendation resolved. The recommendation can be closed when OIG receives and accepts documentation that EXIM has updated the EXIM Building Security Policy to include requiring all EXIM staff, including staff utilizing the garage entrance, to utilize the turnstiles for entering and exiting the Lafayette Building.

APPENDIX A: OBJECTIVES, SCOPE, AND METHODOLOGY

EXIM OIG conducted this review from May 19, 2023, to August 8, 2023, in accordance with the *Quality Standards for Inspection and Evaluation*, as issued in 2020 by the Council of the Inspectors General on Integrity and Efficiency.

Objectives and Scope

EXIM OIG conducted this review to assess the effectiveness of the access control measures at EXIM headquarters building to prevent unauthorized access, safeguard personnel and resources, and ensure personnel accountability in the event of an emergency at EXIM headquarters (i.e., the historic Lafayette Building located at 811 Vermont Avenue, NW, Washington, DC 20571).

Methodology

During this review, OIG interviewed multiple EXIM management officials with expertise in the subject matter area. OIG conducted portions of this review remotely and relied on audio- and video-conferencing tools to interview EXIM personnel. OIG also conducted independent research, performed in-person sampling observations, analyzed pertinent EXIM-provided records, and reviewed the substance of this report and its findings and recommendations with offices affected by the review. OIG used professional judgment and analyzed physical, documentary, and testimonial evidence to develop its findings, conclusions, and actionable recommendations.

APPENDIX B: MANAGEMENT RESPONSE



Helping American Businesses Win the Future

DATE: November 1, 2023
TO: The Honorable Parisa Salehi, Inspector General, Office of Inspector General
THROUGH: Mary Jean Buhler, Senior Vice President and Chief Financial Officer
FROM: Courtney Chung, Senior Vice President and Chief Management Officer
SUBJECT: EXIM Management Response to the draft Report
Review of Access Control Measures at EXIM Headquarters (OIG-SR-24-01),
Dated November 2023

COURTNEY CHUNG
Digitally signed by
COURTNEY CHUNG
Date: 2023.11.02
09:28:19 -04'00'

Dear Ms. Salehi,

Thank you for providing the Export-Import Bank of the United States (“EXIM” or “EXIM Bank”) management with the Office of Inspector General’s (“OIG”) *Review of Access Control Measures at EXIM Headquarters (OIG-SR-24-01)*, dated November 2023 (the “Report”). Management continues to support the OIG’s work which complements EXIM’s efforts to continually improve its processes. EXIM Bank is proud of the strong and cooperative relationship it has with the OIG.

EXIM Bank appreciates the OIG’s review focused on preventing unauthorized access, safeguarding our EXIM personnel and resources, and ensuring personnel accountability in the event of an emergency.

EXIM concurs with the recommendations. We look forward to our continues strengthening of our working relationship and working closely with eh Office of the Inspector General.

Recommendation 1: EXIM’s Chief Management Officer, in coordination with the Vice President for the Administrative Services Division, should spearhead the establishment of an interagency working group with key stakeholders to address physical access controls, including EXIM’s lack of authority for physical access controls, as well as other life-safety and security issues the group may identify at EXIM headquarters.

Management response:

EXIM concurs with the recommendation. EXIM will work to reestablish the Facility Security Committee (FSC) for the Lafayette Building to include Department of Veteran Affairs (VA), EXIM, Federal Protective Services, General Services Administration, and the Contracted Guard Force to ensure a holistic approach to addressing the physical access and the other security related matters/issues. The FSC will bring together experts and stakeholders that will gain a broader perspective, leading to more robust security related solutions.

Recommendation 2: EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should develop an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.

Management response:

EXIM concurs with the recommendation. EXIM will develop an action plan, including a cost benefit analysis, to address the EXIM headquarters turnstile access issues identified in this report.

Recommendation 3: EXIM's Chief Management Officer, in coordination with the Vice President for Administrative Services Division, should finalize the updated EXIM Building Security Policy and ensure the final version of the revised Policy mandates EXIM employee use of the turnstiles at EXIM headquarters.

Management response:

EXIM concurs with the recommendation. The EXIM Building Security Policy, which is currently under review, is being updated to include requiring all EXIM staff, including staff utilizing the garage entrance, to utilize the turnstiles for entering and exiting the Lafayette Building

CC:

The Honorable Reta Jo Lewis, President and Chair of the Board of Directors
Hazeen Ashby, Senior Vice President and Acting Chief of Staff
Larry Decker, Senior Advisor to the President and Chair, and Acting Deputy Chief of Staff
Kenneth Tinsley, Senior Vice President and Chief Risk Officer
Inci Tonguch-Murray, Senior Vice President and Deputy Chief Financial Officer
Selma Hamilton, Director of Security Services
Tomeka Wray, Vice President of Operations and Acting Deputy Chief Management Officer

ABBREVIATIONS

EXIM	Export-Import Bank of the United States
OIG	Office of Inspector General
PIV	Personal Identity Verification

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For additional resources and information about whistleblower protections and unlawful retaliation, please visit [the whistleblower's resource page](#) at [oversight.gov](https://www.oversight.gov).