Office of the Inspector General
U.S. Department of Justice

Audit of the Federal Bureau of Prisons' Armory Munitions and Equipment

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AUDIT OF THE FEDERAL BUREAU OF PRISONS' ARMORY MUNITIONS AND EQUIPMENT

EXECUTIVE SUMMARY*

The Federal Bureau of Prisons (BOP) is responsible for protecting public safety by ensuring that federal offenders serve their sentences of imprisonment in facilities that are safe and appropriately secure. In support of this mission, BOP institutions maintain armories, which are secure depositories for BOP's emergency equipment. The armories contain firearms, ammunition, chemical agents, stun munitions, badges, communication equipment, detection equipment, and defensive equipment (collectively referred to here as armory munitions and equipment). Armory munitions and equipment are made available for routine assignments, as part of emergency response, and for training exercises. Each institution's Security Officer is delegated the day-to-day responsibility for controlling, maintaining, and inventorying armory munitions and equipment, using BOP's Security Officer System (SOS). As of December 2015, BOP operated 122 institutions with 120 armories.

Following a BOP employee pleading guilty in December 2011 to stealing stun munitions from Federal Correctional Complex (FCC) Florence during tactical trainings, the U.S. Department of Justice Office of the Inspector General conducted this audit to assess BOP's controls over armory munitions and equipment, including the use of armory munitions and equipment for training. We also evaluated BOP institutions' compliance with policies governing armory munitions and equipment, and the accuracy of armory inventories, by conducting site-work at seven BOP institutions. The audit covers activity in BOP's armories from the start of fiscal year 2013 through December 2015.

Our audit identified several deficiencies in BOP's controls and practices for safeguarding armory munitions and equipment that increase the risk that armory munitions and equipment could be lost, misplaced, or stolen without being detected. Specifically, we found weaknesses in BOP's controls over tracking, issuing, and reporting on both active and expired armory munitions and equipment, as well as BOP institutions' compliance with existing policies. Most significantly, we found that while SOS provides current inventory data, including item descriptions, quantity, and locations within the facility, it does not capture any data for tracking product movement, such as increases and decreases in inventory over time or the reasons for the changes in quantity. As a result, the Security Officers can move inventory in and out of armories, and change information in SOS, without leaving any record that a change in inventory occurred. Moreover, expired munitions are not required to be included as part of periodic inventory reports, further limiting what BOP knows about armory inventories and increasing the risk that armory munitions and equipment could be lost or stolen.

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* The full version of this report contains information that the Federal Bureau of Prisons considered to be law enforcement sensitive, and therefore could not be publicly released. To create this public version of the report, the Office of the Inspector General redacted (blacked out) portions of the full report.

We also found discrepancies between SOS and another BOP system, the SENTRY Property Management System (SPMS), which is used to track controlled property, including some armory items. The discrepancies we found indicated that the information in SOS is neither complete nor accurate. We determined that a primary cause of these discrepancies was the fact that BOP's requirements for tracking controlled property through SPMS are completely independent from the requirements for tracking armory munitions and equipment through SOS.

Our audit determined that BOP did not always adequately document the authorization and use of armory munitions and equipment. We identified two major weaknesses in this regard. First, because the authorizing official is not required to sign the form required for removing and returning items from the armory, there is no record showing that the use of armory munitions and equipment was actually approved by an authorized official. Second, the form requires the individual returning items to the armory to attest that all the expendable items removed from the armory were used, or if not, to list the items and quantities that were returned. However, we found that the form only requires the initials of the person attesting to this information, and in many instances we could not determine who initialed this line. When we were able to identify the individual making the attestation, we found that the majority of the forms we reviewed were initialed by the Security Officer or other armory staff, not the person who checked out the items and therefore had knowledge of what was actually expended outside of the armory. We also found that, at four of the seven armories where we conducted site-work, the Security Officer does not use the required form when personally removing items from the armory, despite BOP's requirement that all armory munitions and equipment be signed for upon issuance.

Additionally, we determined that BOP's controls are not adequate to ensure that only authorized armory munitions and equipment are stored in its armories. We compared the institutions' armory inventories to BOP's list of authorized munitions and equipment and identified instances where BOP institutions were maintaining unauthorized chemical agents or ammunition. Moreover, we were not able to determine whether the majority of the chemical agents and stun munitions were authorized because the munitions' names used on the authorized list were either outdated or too general, and they did not match the names in the inventories.

Finally, at six of the seven institutions where we conducted site-work, we found that armory staff did not properly document the dates that required periodic inventories and test fires were conducted, thereby creating the risk that items could have been erroneously reported as having being inventoried or test fired. Our audit also identified inventory errors that BOP institutions should have identified during their quarterly physical inventories, but did not.

Our report includes 14 recommendations to improve BOP's handling of armory munitions and equipment.

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INTRODUCTION

The Federal Bureau of Prisons (BOP) is responsible for protecting public safety by ensuring that federal offenders serve their sentences of imprisonment in facilities that are safe and appropriately secure. In support of this mission, BOP institutions maintain armories, which are secure depositories for BOP's emergency equipment. The armories contain firearms, ammunition, chemical agents, stun munitions, badges, communication equipment, detection equipment, and defensive equipment (collectively referred to here as armory munitions and equipment). Armory munitions and equipment are made available for routine assignments, such as escorts and armed control, perimeter, and tower posts; as part of emergency response, including disturbances and escapes; and for training exercises, including bureau-wide firearms qualifications and specialized training for tactical response teams. BOP physically secures armory munitions and equipment ▮▮▮▮▮▮▮ that can only be accessed by select BOP personnel. Armory operations also include tracking armory munitions and equipment outside of the physical armory, including items stored at ▮▮▮▮▮▮▮▮▮▮.

BOP's Correctional Services Branch is responsible for issuing guidance to all BOP armories, which is outlined in BOP's correctional services policy. Each institution's Captain has the overall responsibility for the armory, including ensuring that the institution maintains sufficient types and quantities of armory munitions and equipment, and follows inspections procedures. The Security Officers are delegated the day-to-day responsibility for controlling, maintaining, and inventorying armory munitions and equipment. Armory munitions and equipment are tracked using the Security Officer System (SOS), which provides current inventory data, including item descriptions, quantity, and ▮▮▮▮▮▮▮ ▮▮▮. Additionally, BOP classifies weapons, communications equipment, and a select group of other items as controlled property; as a result, these items are also tracked in the SENTRY Property Management System (SPMS) and are subject to additional inventory controls.[1] This guidance is outlined in BOP's Property Management Manual.

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[1] SENTRY is BOP's national on-line automated information system used to provide operational and management information requirements.

As of December 2015, BOP operated 122 institutions across 6 Federal Prison System regions at 5 different security levels, including minimum, low, medium, high, and administrative.[2] The 122 institutions operated 120 armories.[3]

Office of the Inspector General Audit Approach

The objectives of our audit were to evaluate: (1) BOP's controls over armory munitions and equipment, (2) the institutions' compliance with policies governing armory munitions and equipment, and (3) the accuracy of BOP's armory munitions and equipment inventory. The scope of our audit covers activity in BOP's armories from the start of fiscal year 2013 through December 2015. To accomplish our objectives, we interviewed BOP's Central Office personnel, including officials from the Correctional Services Branch, who are responsible for issuing guidance to BOP's armories. We evaluated BOP's policies regarding armory operations and armory munitions and equipment, as well as the forms and reports used by the armories. We also conducted site-work at seven BOP armories, including Federal Correctional Institutions (FCI), U.S. Penitentiaries (USP), and an Administrative Maximum USP (ADX), as shown in Table 1.

Table 1

BOP Armories Selected For Review

Institution/Armory	Location	Security Level	BOP Region
FCI Englewood	Littleton, CO	Low	North Central
FCI Florence	Florence, CO	Medium	North Central
USP Florence	Florence, CO	High	North Central
ADX Florence	Florence, CO	Administrative	North Central
FCI Phoenix	Phoenix, AZ	Medium	Western
FCI Tucson	Tucson AZ	Medium	Western
USP Tucson	Tucson, AZ	High	Western

Source: BOP

The purpose of our site-work was to examine the institutions' compliance with BOP policy. We also determined if armory munitions and equipment were properly tracked from purchase through disposition. Finally, we conducted a physical inventory of a sample of armory munitions and equipment. Appendix 1 contains a more detailed description of our audit objectives, scope, and methodology.

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[2] The number of institutions excludes privately managed facilities.

[3] ██████████████████████████████████ Rather, ████████████████████
████████████████████████████████ , report having ██████████████████████ .
Also, ████████████████████████████ because both institutions have an adjacent low security
satellite prison ████████████████ Finally, the armory count does not include Administrative U.S.
Penitentiary Thomson, which was newly active.

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FINDINGS AND RECOMMENDATIONS

Our audit identified several deficiencies in BOP's policies and practices for safeguarding armory munitions and equipment that increase the risk that armory munitions and equipment could be lost, misplaced, or stolen without being detected. Specifically, we found weaknesses in BOP's controls over tracking, issuing, and reporting on both active and expired armory munitions and equipment, as well as BOP institutions' compliance with existing policies. Most significantly, the Security Officer can move inventory in and out of the armory, and change information in SOS, without leaving any record that a change in inventory occurred. We also found that information in SOS and the accompanying inventory and test fire reports was neither complete nor accurate. Additionally, the authorization and use of armory munitions and equipment was not always adequately documented. Finally, we identified unauthorized chemical agents and ammunition among BOP institutions' armory inventories, and in many instances we were not able to determine if the munitions the institutions were maintaining were authorized and met BOP's required minimum quantities because BOP's lists of authorized munitions are outdated and otherwise inadequate.

BOP's Controls Over Armory Munitions and Equipment

The U.S. Department of Justice, Office of the Inspector General (OIG) conducted this audit following a BOP employee pleading guilty in December 2011 to stealing stun munitions from Federal Correctional Complex (FCC) Florence during tactical trainings. We addressed this incident by assessing BOP's controls over armory munitions and equipment, including the use of armory munitions and equipment for training. We also completed various tests to determine if the seven institutions where we conducted site-work were complying with BOP's existing policies.

In response to this incident, BOP modified its Arms/Equipment Issue Form, which tracks items removed from and returned to the armory. The form now requires the employee responsible for checking items into the armory to attest whether or not all expendable items were used, and if not, the quantity returned to the armory. We believe the additional attestation provides greater assurance that armory munitions and equipment are properly safeguarded during training. However, in our judgment, the value of this control is limited, particularly in light of inadequate inventory management controls and tracking issues we identified during the course of our audit. We also identified deficiencies related to the Arms/Equipment Issue Forms, maintaining authorized armory munitions and equipment, guidance for FCCs, and report requirements.

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Tracking Requirements

Strong controls over armory munitions and equipment require an inventory management system that maintains historical data. This includes tracking product movement – the increases and decreases in inventory and the reasons for the changes in quantity. However, we found that SOS does not capture any historical data. Rather, the system only provides a snapshot of the quantity and locations of the current armory munitions and equipment inventory. BOP policy requires its institutions to maintain some historical records, including monthly inspections and quarterly inventory reports. This, in conjunction with purchase documentation and hard copies of the Arms/Equipment Issue Forms, make up BOP's controls for tracking armory munitions and equipment.

However, because BOP only requires institutions to maintain printed monthly and quarterly reports, BOP's ability to track and explain inventory changes that occur during the time that elapses between the printed reports, or the reason for the changes, is severely limited. Without the ability to use BOP's inventory tracking system to identify specific dates when changes occur, the quantities changed, and the reason for the changes, it is very difficult, if even possible, to audit armory munitions and equipment. For example, since SOS only contains current inventory data, in conducting this audit we were unable to use SOS to identify changes in inventory to ensure that the changes were authorized, allowable, and properly documented. Moreover, the Security Officer could move inventory in and out of the armory and change information in SOS, without leaving any record that a change in inventory occurred, increasing the risk that armory munitions and equipment could be lost, misplaced, or stolen without being detected.

Despite the limitations of SOS, we performed a number of audit procedures at the seven institutions where we conducted site-work, in an attempt to determine if the institutions were properly tracking their armory munitions and equipment over time. We identified three instances at FCI Englewood where inventory was not properly accounted for in SOS. This included: (1) a purchase of 100 ███████████ ███████████████████ that were not recorded; (2) 8 rounds of ████████████████ ████████████████████████ ammunition was removed from and then added back to magazines stored in ████████████████, but the magazine counts were never updated to show that ammunition was removed; and (3) 6 ██████████ that were removed from FCI Englewood's active inventory and, according to the Security Officer, added to the Management and Specialty Training Center's (MSTC) inventory, with no corresponding increase to MSTC's ████████ inventory.[4] We also found that FCI Englewood added 14 ████████████████████████████████████ to the armory's inventory, but the Security Officer was not able to provide documentation or an explanation for where these items came from. Because these inventory changes were not documented, our understanding of these issues was

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[4] MSTC is part of BOP's National Corrections Academy located in nearby Aurora, Colorado, and uses FCI Englewood's range for tactical exercises. FCI Englewood's armory stores MSTC's training munitions and equipment.

therefore based solely on the Security Officer's recollection of past events. Our inability to audit this information highlights the limits of BOP's current inventory system.

The absence of auditable records was most evident when we looked at expired munitions. All chemical agents and stun munitions are considered to be expired 5 years after the received date. According to BOP's correctional services policy, expired munitions should be removed from the active inventory and moved to the expired inventory. These items are either used for training or destroyed. BOP requires the expired munitions inventory to be included in SOS, which, again, only provides the current inventory. However, unlike active inventory, the institutions are not required to conduct monthly inspections and quarterly inventories of expired items or retain inspection and inventory reports.[5] As with any armory munitions or equipment removed from the armory, if the expired munitions are used for training, the Security Officer completes an Arms/Equipment Issue Form. While this provides some control over expired munitions outside of the armory, it only addresses one of many potential risks related to this inventory. For example, the only way to determine if items were removed from the expired inventory for training or other purposes would be to go through all the Arms/Equipment Issue Forms and identify forms that include expired munitions. While the forms should indicate how many items were used or returned, without an inventory tracking system that contains historical data indicating the quantity on hand before or after the expired munitions were issued, there is no way to verify that the Arms/Equipment Issue Forms accurately reflect the quantity that was used. Additionally, there is no way to determine if expired munitions were removed from the armory if any Arms/Equipment Issue Forms were misplaced or never completed. This same issue also applies to movement or use of active inventory items.

While conducting physical inventory, we identified two inventory errors related to expired munitions, which are detailed later in this report: FCI Englewood understated its expired ▮▮▮▮▮▮ inventory by 20 ▮▮▮▮▮ , and FCI Phoenix overstated its expired ▮▮▮▮▮ inventory by 5 ▮▮▮▮ . Because expired munitions are not required to be included as part of periodic inventories, the Security Officers are not required to check the expired munitions counts and are therefore less likely to identify errors such as these. We discussed this issue with BOP's Central Office. Correctional Services Branch officials stated that excluding expired munitions from periodic inventories appeared to be an oversight, and they acknowledged that including expired munitions in the quarterly inventory seemed like a reasonable next step.

Additionally, during our site-work, we identified several best practices that were independently implemented by the institutions to address the shortcomings of the current inventory tracking system. FCI Florence, USP Florence, ADX Florence,

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[5] BOP's North Central Region requires its armories to submit a copy of their Expired Munitions Reports to the regional office each month. We did not see this practice in other regions.

and FCI Phoenix all maintain listings of stun munitions by manufacturer serial numbers.[6] This means that in addition to tracking these items by the current quantity on-hand, location, and expiration date, the institutions track each item individually from receipt through disposal. This practice allows the Security Officers to more closely track what is used for training by listing individual serial numbers on the Arms/Equipment Issue Form. ADX Florence goes so far as to put the serial numbers on the spoons of the munitions, so even detonated munitions can be returned to the armory and matched against the list of what was issued.

FCI Phoenix, FCI Tucson, and USP Tucson keep hand written logs that record changes in active inventory. This includes a record of the balance on a given date, the reason for the change, and the new balance. We saw a similar practice at FCI Florence for expired munitions, where the Security Officer keeps copies of prior Expired Munitions Reports with hand written explanations for the differences. The combination of these two practices essentially creates the historical inventory records that are missing from SOS. In our judgment, a running log accounting for all changes to inventory, hand written or otherwise, is the best method for tracking inventory until improvements are made to the armory tracking system allowing historical data to be captured and reported. This log creates an audit trail that allows anyone to track all armory munitions and equipment from receipt through disposal. We believe this trail should be maintained for both active and expired items for all BOP armories.

We discussed this issue with BOP's Central Office. A BOP official from the Systems Development Branch told us that BOP is working on an enterprise system that will replace SOS for tracking armory munitions and equipment. According to the Systems Development Branch official, the new system could be designed to address the historical data issue, along with many other issues identified during the course of our audit. However, until the new infrastructure is in place, BOP will have to work with what is currently available. Therefore, we recommend that BOP require armories to maintain a log documenting the date and purpose of every change to the armory munitions and equipment inventory along with a running balance of the quantity on hand. We also recommend that BOP require expired munitions to be included as a part of the armories' monthly inspections and quarterly inventories.

SPMS Records

BOP classifies the following armory munitions and equipment as controlled property: weapons, both lethal and less-lethal; 2-way radios; cell phones; camcorders and video recorders; and some detection equipment. This equipment is therefore subject to two parallel tracking requirements. First, according to BOP's Property Management Manual, a property tag must be put on each piece of

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[6] According to BOP officials, the Bureau of Alcohol, Tobacco, Firearms and Explosives determines which munitions are required to have manufacturer serial numbers. Some, but not all, of BOP's munitions are included on this list.

controlled property. Each property tag represents a unique Federal Prison System Identification (FPS-ID) number that is tracked through SPMS. Second, according to BOP's correctional services policy, these items are also required to be tracked through SOS.

In order to determine if all controlled property that is also the responsibility of the armory is in fact tracked accurately through both systems, we compared the information in the two systems. We identified a number of discrepancies between the SOS and SPMS records, indicating that the information in SOS is neither complete nor accurate. The results are summarized in Table 2.[7]

Table 2
Discrepancies Between SOS and SPMS

Institution	SOS Record with the Same FPS-ID as Another SOS Record	Incorrect FPS-ID in SOS or FPS-ID Typo in SOS	Disposed Items Still Recorded in SOS	SOS Records We Could Not Associate With SPMS Records	SPMS Records We Could Not Associate With SOS Records
FCI Englewood	1	1	5	24	27
FCI Florence	0	1	3	11	87
USP Florence	0	0	0	24	48
ADX Florence	6	0	2	28	47
FCI Phoenix	0	1	2	6	24
FCI Tucson	1	0	0	16	38
USP Tucson	2	2	0	47	74

Source: FCI Englewood, ADX Florence, USP Florence, FCI Florence, FCI Phoenix, FCI Tucson, and USP Tucson

The major issue we identified related to not being able to associate SOS records with SPMS records and vice versa. This issue in large part was due to the fact that when an item is categorized under general items in SOS, as opposed to weapons or communications, the system does not include the FPS-ID field for that item. The Security Officer can include the FPS-ID in the description field; however, this is not a requirement. It is likely that a large number of the SOS records we could not associate with SPMS records could be linked to SPMS records; however, we could not make this link for purposes of our analysis because the FPS-ID was not listed in SOS. For the SPMS records we could not associate with SOS records, either the corresponding SOS record did not include an FPS-ID or the item was not recorded in SOS. Other issues included items that were disposed, but still listed on the SOS inventory; items with the same FPS-ID listed in SOS, which either points to a duplicate record or an error in the FPS-ID field; and incorrect or incomplete FPS-IDs in SOS.

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[7] Seventeen of the 38 SPMS records at FCI Tucson were assigned to a location in SPMS that FCC Tucson does not specifically identify as FCI Tucson or USP Tucson, meaning those items could be recorded either in either FCI Tucson's or USP Tucson's SOS.

Two of the issues noted above were also identified during our physical inventory. We looked at FCI Englewood's ███████████████████ and the Warden's cell phone and noted that the FPS-IDs listed in SOS did not match the tags on the items because the items listed in SOS were previously disposed. This means FCI Englewood did not update SOS when the old items were destroyed or when the replacement items arrived. We also found that USP Tucson had a ████████████ ████ located in the ██████████; however, the SPMS record lists the item as a ██████████████. This serves as another example of discrepancies between the two systems.

We determined that a central factor in these discrepancies is that BOP's requirements for tracking controlled property through SPMS are completely independent from tracking armory munitions and equipment through SOS. Presumably, all controlled property that is the responsibility of the armory should be recorded in both systems. However, there is no control in place to ensure this is in fact the case. We believe the issues identified above were the result of that missing control. Therefore, we recommend that BOP require institutions to update SOS to include the FPS-ID for all controlled property. We also recommend that BOP require institutions to reconcile SOS and SPMS at least annually. This additional step provides greater assurance that the information in SOS is complete and accurate.

Additionally, for some of these items, the Accountable Property Officer (APO) – that is the person responsible for the custody, record keeping, and use of SPMS controlled property within the employee's assigned location or jurisdiction – is not necessarily the Security Officer, even though BOP policy requires that the Security Officer account for, control, inventory, and maintain these items. Consequently, when an item is purchased or disposed, if the APO for that item does not communicate this information to the Security Officer, the item may not be entered into or removed from SOS. While we offer no specific recommendation on this issue, BOP may want to consider whether having two officials tracking these items is duplicative, and if so, BOP may want to consider ways to reduce that duplication in a manner that is consistent with institutional security, such as by making the Security Officer the APO.

Finally, as part of our site-work, we looked at 14 ████████████. ██████████████ are considered weapons and are therefore required to have a property tag and be tracked through SPMS. We found that nine ████████████ at five institutions were not tagged, including one ████████████ at ADX Florence, three ████████████ at USP Florence, two ████████████ at FCI Florence, two ████████████ at FCI Phoenix, and one ████████████ at FCI Tucson. As the result of our audit, the five institutions created an FPS-ID for each of the nine ████████. This issue was also identified in a previous OIG audit.[8] It appears that not all institutions are aware of this

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[8] U.S. Department of Justice Office of the Inspector General, *The Federal Bureau of Prisons' Control Over Weapons and Laptop Computers*, Audit Report 02-30 (August 2002), 20-21.

requirement. Therefore, we recommend BOP ensure that all ██████████ are tagged and included in SPMS.

Arms/Equipment Issue Forms

We also found that the authorization and use of armory munitions and equipment was not always adequately documented, further increasing the risk that armory munitions and equipment could be lost, misplaced, or stolen without being detected. According to BOP's correctional services policy, the Security Officer is responsible for issuing armory munitions and equipment, and all weapons, ammunition, and equipment will be signed for upon issuance. BOP uses an Arms/Equipment Issue Form to issue armory munitions and equipment. A copy of this form is included in Appendix 2. As part of our site-work, we reviewed several instances where armory munitions and equipment were issued, including 65 completed Arms/Equipment Issue Forms. We identified two major weaknesses with the form itself. We also identified problems related to whether or not the Arms/Equipment Issue Form was completed, as well as how the form was completed.

The first weakness we identified related to Line 1 on the Arms/Equipment Issue Form, which requires the person completing the form, who is generally the Security Officer, to list the authorizing official. According to the form, the authorizing official may be the Warden, Associate Warden, Captain, or Lieutenant. Authorization means that a senior official is giving the Security Officer permission to remove armory munitions and equipment from the armory. However, the authorizing official is not required to sign the form. In our judgment, the authorization is only meaningful if there is an accompanying signature. Without a signature, there is no way of knowing whether or not the use of the items listed on the Arms/Equipment Issue Form was actually approved by an authorized official. We noted that 19 of the 65, or 29 percent, of the completed forms that we reviewed included a signature on Line 1. We believe this is a best practice that should be required bureau-wide.

The second weakness we identified related to Line 7 on the Arms/Equipment Issue Form, which requires the individual returning items to the armory to attest that all the expendable items removed from the armory were used, or if not, to list the items and quantities that were returned. It also requires the initials of the individual making this attestation. According to BOP officials, the purpose of Line 7 is for the person returning armory munitions and equipment to the armory to explicitly state whether or not the expendable items were used. This line is the added control in response to the BOP employee stealing munitions at FCC Florence. However, during our review of completed forms, we found two issues with this section. First, Line 7 only requires initials versus a name, title, and signature. This is a problem because it makes it difficult to determine who is making this attestation. For 7 of the 65, or 11 percent, of the completed forms that we reviewed, we could not tell who initialed this section of the form. Second, the form does not specify who should complete this line. As a result, there were many

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instances where the Security Officer or armory staff, not the person who checked out the items and therefore had knowledge of what was used outside of the armory, initialed this section. For 36 of the 65, or 55 percent, of the completed forms that we reviewed, the Security Officer erroneously initialed this section. These issues are of particular significance, given the incident at FCC Florence and the fact that Line 7 was the added control to prevent armory munitions and equipment from being stolen while outside of the armory.

As stated previously, we believe that Line 1 of the Arms/Equipment Issue Forms should require the authorizing official's written signature. We also identified two changes that would address the issues related to Line 7. First, the form should require the person making this attestation to provide a printed name/title and written signature. Second, the form should make it clear that the person making this attestation must be the staff member returning the equipment who has direct knowledge of whether or not all expendable items were used. In order to address our concerns related to the layout of the Arms/Equipment Issue Form, we recommend BOP update the form to include the authorizing official's written signature and the name/title and written signature of the person who can attest to whether or not all expendable items were used.

In addition to our concerns related to the design of the Arms/Equipment Issue Forms, we identified issues related to how the 65 forms we reviewed were completed, as summarized in Table 3.

Table 3

Arms/Equipment Issue Form Errors

Line on Form	Issue	Number of forms with the Issue	% of Forms with the Issue	Institutions with the Issue
1. Authorizing Official	Security Officer, not an authorizing official, listed.	8	12%	FCI Englewood
3. Employee Receiving Equipment/Weapons	Line left blank.	2	3%	USP Tucson
7. Expendable items were used, if no, amount returned.	Armory staff, not the person returning items to the armory, initialed that all items were returned or expended.	36	55%	6 of 7
7. Expendable items were used, if no, amount returned.	Could not determine who initialed that all items were returned or expended.	7	11%	3 of 7
8. Printed name/title & written signature of issuing officer	No written signature.	3	5%	3 of 7
8. Printed name/title & written signature of issuing officer	No title.	4	6%	FCI Phoenix
9. Printed name/title & written signature of receiving staff.	Either no printed name or could not read printed name.	4	6%	2 of 7
9. Printed name/title & written signature of receiving staff.	No title.	21	32%	5 of 7
10. Printed name/title & written signature of receiving officer.	Either no printed name or could not read printed name.	5	8%	3 of 7
10. Printed name/title & written signature of receiving officer.	No title.	9	14%	4 of 7
10. Printed name/title & written signature of receiving officer.	No written signature.	5	8%	3 of 7

Source: FCI Englewood, ADX Florence, USP Florence, FCI Florence, FCI Phoenix, FCI Tucson, and USP Tucson

The most frequent issues we identified related to the initials that appear in Line 7 of the form, as previously discussed. Another pervasive issue we identified was that the forms did not include an employee's title, along with their name and signature. In total, there were 34 missing titles in the 65 forms we reviewed. This appears to simply be an oversight, because the form's instructions clearly list this as a requirement.

We also identified one instance at FCI Phoenix where there appeared to be an error on the Arms/Equipment Issue Form; specifically, the number of ammunition rounds returned to the armory listed on the form did not match the hand written log that tracks inventory changes. The error was not identified by the Security Officer when the unused rounds were checked back in to the armory. The

Security Officer attested to receiving five fewer rounds of ammunition than were actually returned to the armory.

At four of the seven armories where we conducted site-work, the Security Officer does not use an Arms/Equipment Issue Form when personally removing items from the armory for test firing, conducting training, or transferring to another armory. The following are examples of instances where armory munitions and equipment were issued without an accompanying Arms/Equipment Issue Form.

- FCI Phoenix, FCI Tucson, and USP Tucson all conducted test fires using between 13 and 30 rounds of ammunition; however, the 3 Security Officers indicated that they do not complete a form when removing ammunition from the armory for test fires.

- FCI Englewood's Security Officer conducted a training using ███████████ ███████; however, he stated that because he conducted the training, he did not complete a form.

- FCI Tucson transferred 70,000 rounds of ███████████████ ammunition to USP Tucson; however, FCC Tucson officials stated that they generally do not complete a form when they transfer items between the two armories at the complex.

The Security Officers at FCI Phoenix, FCI Tucson, and USP Tucson use a hand written log indicating that a test fire took place, items were transferred between the armories, or an item was expended. While this log is sufficient to show why there was a change in the inventory, it does not appear to meet BOP's requirement that the recipient, in this instance by the Security Officer, signs for inventory and receives approval from an authorizing official. Without authorization, the Security Officer has unrestricted access to remove anything from the armory. Given the limits of SOS, the Security Officer can remove an item and update the inventory record with no accompanying paper trail. The hand written logs referred to above mitigate the record keeping issue; however, the log is not required.

Ensuring that Arms/Equipment Issue Forms are completed and completed correctly is not only a matter of complying with BOP's existing policy. It also serves as an additional control to ensure that armory munitions and equipment are properly tracked all the way through disposal. It is evident that the institutions need additional instructions regarding when and how the Arms/Equipment Issue Form should be completed. Therefore, we recommend BOP ensure that Security Officers properly complete Arms/Equipment Issue Forms for anything removed from the armory, including items issued to the Security Officer.

Authorized Armory Munitions and Equipment

BOP's correctional services policy states that weapons, ammunition, and chemical agents and stun munitions are standardized throughout BOP. Accordingly, the policy includes BOP's list of authorized armory munitions and equipment, as

well as a list of mandatory minimums for many of these items. For weapons and ammunition, only the items listed in BOP's correctional services policy are to be maintained at the institutions. For chemical agents and stun munitions, only the items listed in the policy, or items of equal quality and specifications, are to be maintained at the institutions.

As part of our site-work, we compared the institutions' armory munitions and equipment inventory to BOP's list of authorized items and mandatory minimums to determine if the institutions were meeting BOP's authorized and minimum inventory standards. We identified instances where institutions' were maintaining unauthorized chemical agents or ammunition. However, we were not able to determine if all armory munitions and equipment were authorized because of issues related to chemical agents and stun munitions policy, and a lack of standard naming conventions across BOP.

Unauthorized Armory Munitions and Equipment

During our review of armory munitions and equipment inventories at the seven institutions where we conducted site-work, we identified instances where institutions had unauthorized chemical agents and ammunition in the armory. Three institutions, including USP Florence, FCI Tucson, and USP Tucson, had ▮▮▮▮▮▮▮▮▮▮▮▮▮▮, a chemical agent that is not on the authorized chemical agent list and is therefore not allowed to be maintained by the institutions. According to BOP's Central Office, ▮▮▮▮▮▮▮▮ was authorized prior to the 2003 revision of its correctional services policy and the exclusion was not intentional. The Security Officers at the three institutions identified this as a chemical agent that they have always carried on their inventory. However, it is no longer listed and therefore not authorized. As a result, we recommend BOP require institutions to dispose of all ▮▮▮▮▮▮▮▮▮▮▮▮, or add ▮▮▮▮▮▮▮▮▮▮▮ to the list of authorized munitions.

As of August 2015, FCI Tucson had 26,284 rounds of ▮▮▮▮▮▮▮▮▮▮▮ ammunition. This ammunition is not included on the authorized ammunition list and is therefore not allowed to be maintained at the institutions. FCI Tucson's Security Officer stated that he accepted this ammunition as a substitute for an order of ▮▮▮▮▮▮▮ ammunition, which is authorized training ammunition. He stated that the institution is using this ammunition for training purposes. FCI Tucson officials do not believe they talked to either the regional or Central Office about this decision, meaning no one evaluated whether or not the substitution was appropriate given the circumstances surrounding this order. This includes determining whether or not the substitute ammunition was appropriate for BOP training. As a result, we recommend that BOP ensure that FCI Tucson's ▮▮▮▮ ▮▮▮▮▮▮▮ ammunition is either disposed or evaluated and explicitly authorized.

As of August 2015, USP Tucson had 1,060 rounds of ▮▮▮▮▮▮▮▮▮▮ ▮▮ ammunition. This ammunition is not included on the authorized ammunition list and is therefore not allowed to be maintained by the institutions. USP Tucson's Security Officer stated that this ammunition has been in the armory since 1989 and

it was for a Special Operations Response Team (SORT) rifle that is no longer used.[9] He stated that in January 2015 he received approval to dispose of the ammunition by firing it. He added that disposal takes time, because the weapon can only fire a few dozen rounds each day. We saw a decrease in the ███████████████████ ammunition inventory after April 2015, which supports the Security Officer's assertion that he is in the process of disposing the ammunition. We also reviewed USP Tucson's decision with BOP's Central Office. Correctional Service Branch officials stated that the institution's approach to removing the unauthorized ammunition from the armory sounded reasonable, particularly considering the cost of other disposal methods. We offer no recommendation, because the ammunition is already in the process of being disposed.
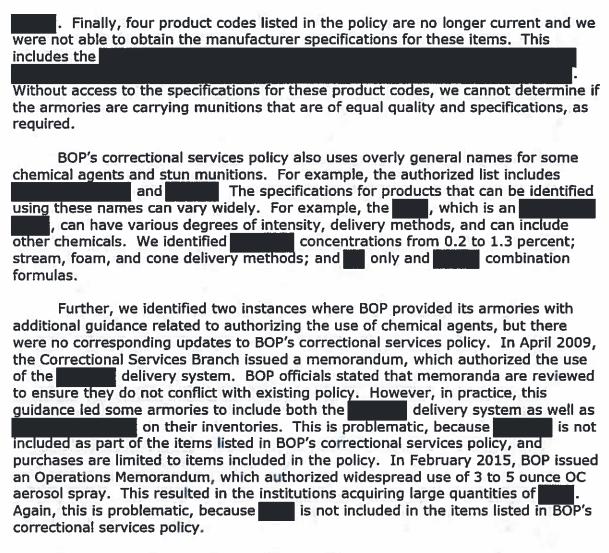
Chemical Agents and Stun Munitions

When we tried to compare the institutions' chemical agents and stun munitions inventory to the items listed in BOP's correctional services policy, we were not able to determine if all of the items were authorized because the names in the policy and the names in the institutions' inventory reports generally did not match.[10] We tried to determine if the products were of equal quality and specifications by researching the specifications for both what was listed in the policy and the institutions' inventory reports. However, we ran into a number of issues.

BOP's correctional services policy uses manufacturer-specific product names and manufacturer-specific product codes for some chemical agents and stun munitions. We identified a number of instances where the armories are using a product from a different manufacturer, and there are indications that the products are not of equal quality and specifications. For example, BOP's correctional services policy refers to the ████████████████████████ round, a name that can be tied to a specific manufacturer. The manufacturer specifications indicate that this is a ████ ███████████ round with a maximum effective ███████████. However, we found institutions were using both a ██████████████████████ and a ████████████ ████████████████████████, which are produced by a different manufacturer. These are also ████████████████ rounds; however, they have a maximum effective ███████████ ████████████ respectively. In our judgment, the products do not have equal specifications given the large differences in the effective range. We also identified what appear to be typos in two of the product codes. The BOP's correctional services policy refers to the ████████████████████████ and ████████████████████████; however, these should actually be ████████████████████ and ████████████

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[9] As of June 2015, there were 35 SORTs that serve their institution, as well as surrounding institutions. The SORT mission is to provide a flexible and effective response to unconventional and high-risk situations, including escorts and emergency response. SORT training primarily uses lethal weapon systems.

[10] FCI Phoenix's SOS inventory report uses the same names for chemical agents and stun munitions as BOP's correctional services policy. However, during our physical inventory, we identified instances where what was on the shelf did not match what was listed in SOS. While this appears to be an effort to match SOS inventory with what is required according to BOP policy, it creates another issue; specifically, the inventory report does not reflect what the armory is actually carrying.

████. Finally, four product codes listed in the policy are no longer current and we were not able to obtain the manufacturer specifications for these items. This includes the ██ ██. Without access to the specifications for these product codes, we cannot determine if the armories are carrying munitions that are of equal quality and specifications, as required.

BOP's correctional services policy also uses overly general names for some chemical agents and stun munitions. For example, the authorized list includes ████████████ and ██████ The specifications for products that can be identified using these names can vary widely. For example, the ████, which is an ████████ ████, can have various degrees of intensity, delivery methods, and can include other chemicals. We identified ███████ concentrations from 0.2 to 1.3 percent; stream, foam, and cone delivery methods; and ██ only and █████ combination formulas.

Further, we identified two instances where BOP provided its armories with additional guidance related to authorizing the use of chemical agents, but there were no corresponding updates to BOP's correctional services policy. In April 2009, the Correctional Services Branch issued a memorandum, which authorized the use of the ████████ delivery system. BOP officials stated that memoranda are reviewed to ensure they do not conflict with existing policy. However, in practice, this guidance led some armories to include both the ████████ delivery system as well as ██████████████ on their inventories. This is problematic, because ████████ is not included as part of the items listed in BOP's correctional services policy, and purchases are limited to items included in the policy. In February 2015, BOP issued an Operations Memorandum, which authorized widespread use of 3 to 5 ounce OC aerosol spray. This resulted in the institutions acquiring large quantities of ████. Again, this is problematic, because ████ is not included in the items listed in BOP's correctional services policy.

Correctional Services Branch officials stated that the purpose of the authorized and minimum standards is to ensure that each institution has what it needs to respond to an emergency. They also stated that depending on the munition, the Central Office may want to be very specific or very broad when defining the specifications for the list of authorized chemical agents and stun munitions. For example, items with general names provide the institutions with the flexibility to use a wide range of products. In our judgment, the specifications for an authorized item can be narrow or broad; however, in both instances, BOP still needs to define the allowable ranges and types of chemical agents to ensure that the institutions exclude items that BOP deems inappropriate.

It is clear from the issues outlined above that BOP's current list of authorized chemical agents and stun munitions needs to be updated. This necessary update stems from both the need to address the problems with current naming conventions, as well as the need to reflect the changes BOP has instituted since issuing the most recent version of its correctional services policy. BOP should

eliminate references to manufacturer-names and product codes. These specific references are problematic not only because they can become outdated, but they also can make it difficult to determine if products from other manufacturers are of equal quality and specifications. Instead, BOP should include a range of specifications for a given item. This would allow each institution to compare its product's specifications to the range to determine if the product is in fact authorized. This also allows BOP to provide institutions with needed flexibility, while also being restrictive when necessary. Therefore, we recommend that BOP update the correctional services policy by eliminating manufacturer specific names and product codes, adding munitions that are authorized by BOP but not included in the policy, and providing a range of specifications for each munition.

<u>Name Standardization</u>

Based on our review of armory munitions and equipment inventories across BOP, we found that naming conventions vary considerably from one institution to the next. We identified a number of instances where the names used by the institutions in SOS were not sufficiently descriptive to indicate whether the item was authorized and fulfilled the minimum inventory requirement. For the following items, we had to follow up with the institution to confirm the items were fulfilling the authorized and minimum standards.

- FCI Englewood had ██████████████████████████████; however, the weapons' name in SOS was identical to other ███████████████████ ██████████.

- ADX Florence, FCI Tucson, and USP Tucson had ██████████████████; however, the weapons' name in SOS, ████████████████ █████ and ████████████, did not clearly indicate whether or not the ████████████████.

- USP Florence had ██████████████ ammunition; however, the name in SOS, ████████████████████, did not indicate whether the ammunition was ██.

While BOP's correctional services policy lists what is authorized, there are no required naming conventions. It is our understanding that there have been some regional efforts to standardize names. The Correctional Services Branch has also made efforts, albeit informal, to standardize ammunition and weapon names bureau-wide. However, no formal policy has been implemented. Correctional Services Branch officials also indicated that name standardization will be part of the new enterprise tracking system. However, until the new infrastructure is in place, BOP will have to work with SOS.

We believe the benefits of standardization are that BOP could more easily determine if an institution is meeting the authorized use and minimum standards, and standardized naming conventions would allow BOP to more readily evaluate armory munitions and equipment across institutions and regions. We noted that BOP's correctional services policy does not always clearly indicate which type of authorized firearm fulfills the minimum standards for weapons. For example, there

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is no indication which authorized ██████ fulfills the minimum requirement for ███████████████████████████ on the Minimum Standards for Weapons Inventories List. Therefore, the standardized names need to be sufficiently descriptive to indicate that they are both authorized and fulfill the minimum inventory requirement or BOP's correctional services policy needs to more clearly link the two sections together. We recommend that BOP require the armories to use standard naming conventions for weapons, ammunition, and chemical agents and stun munitions, and ensure the standard names clearly tie to the authorized use and minimum standards.
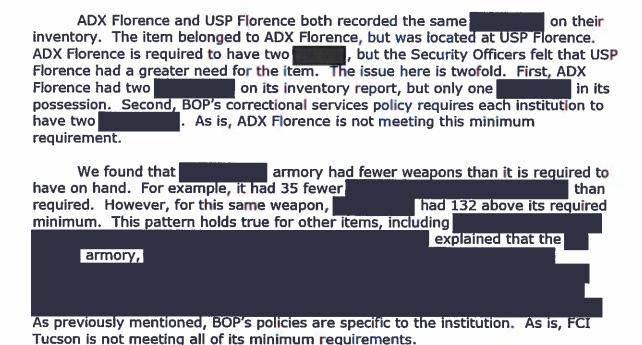
Guidance for Federal Correctional Complexes

BOP's authorized and minimum inventory policies are directed towards the institution and based on the institution's security level; the existing infrastructure, including the number of towers and mobiles; and whether or not there is a SORT. However, we found that BOP's policies do not include additional or alternative guidance for FCCs, despite some of the unique characteristics of FCCs.

FCCs include multiple institutions with different missions and security levels that are located in close proximity to one another. However, the institutions do not operate as standalones; rather, parts of their operations are centralized to maximize efficiency. This includes administrative functions, as well as some correctional services, including tactical response. For example, both █████████ and ████████ have a Disturbance Control Team (DCT) and SORT comprised of members from each institution at the complex.[11] We found a number of different approaches to organizing the armories at FCCs. This includes each institution maintaining an independent armory, one armory serving two institutions, and one armory serving as the primary armory and the other armory serving as a secondary or satellite armory. This can result in armory munitions and equipment being stored in a number of different configurations across the complex. The different approaches appear to address the existing infrastructure, as well as logistical considerations that are unique to a given complex. However, we identified several potential issues with institutions meeting their minimum standards, as a result of these storage configurations.

As part of our site-work, we visited two complexes, FCC Florence and FCC Tucson. FCC Florence has three institutions, including an FCI, USP, and ADX. FCC Tucson has two institutions, including an FCI and USP. Both ADX Florence and FCI Tucson did not meet all of their minimum inventory requirements, because some armory munitions and equipment was stored at another institution within their respective complex.

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[11] All institutions are required to have a DCT. The mission of DCT is to gain and maintain control of a crisis situation. DCT training primarily uses less-than-lethal munitions and delivery systems.

ADX Florence and USP Florence both recorded the same ███████ on their inventory. The item belonged to ADX Florence, but was located at USP Florence. ADX Florence is required to have two ██████, but the Security Officers felt that USP Florence had a greater need for the item. The issue here is twofold. First, ADX Florence had two █████████ on its inventory report, but only one █████████ in its possession. Second, BOP's correctional services policy requires each institution to have two █████████. As is, ADX Florence is not meeting this minimum requirement.

We found that █████████ armory had fewer weapons than it is required to have on hand. For example, it had 35 fewer ████████████████████████████ than required. However, for this same weapon, ██████████ had 132 above its required minimum. This pattern holds true for other items, including ████████████████████████ ███████████████████████████████ explained that the ████ ██ armory, ██ ██ ██ ██

As previously mentioned, BOP's policies are specific to the institution. As is, FCI Tucson is not meeting all of its minimum requirements.

We discussed this matter with BOP's Central Office to gain a better understanding of their expectations when it comes to managing armory munitions and equipment at an FCC. Correctional Services Branch officials stated that they trust the institutions to make decisions that best serve the institution. While we understand why FCCs organize their armories in a number of different ways, we do not believe BOP's policy provides complexes with sufficient guidance regarding the responsibility of each institution and the responsibility of the complex as a whole when it comes to storing armory munitions and equipment. Therefore, we recommend BOP update its policies with specific guidance for FCC armories regarding minimum inventory requirements.

Report Requirements

According to BOP's correctional services policy, the Security Officer is required to conduct monthly inspections of all firearms, and active chemical agents. This is documented in the Monthly Inventory Report. The Security Officer is also required to conduct quarterly inventories of armory munitions and equipment with the exception of communication equipment in January, April, July, and October. Additionally, certain weapons must be test fired every quarter. Both activities are documented in the Quarterly Testing/Inventory Report. The monthly and quarterly reports are required to be retained for the current year plus two previous years. All weapons that are not test fired quarterly are required to be test fired annually. This is documented in the Annual Testing Report for Weapons; however, there is no specific retention requirement for this report. All three reports are generated by SOS. The Security Officer includes an inspection date next to each line item in the report, which indicates that the items were inspected or inventoried, or the weapon was test fired. During our review of these reports, we noted a number of issues.

Six of the seven institutions did not properly document the dates that the quarterly inventory and test fires were conducted. At FCI Englewood, ADX Florence, and USP Tucson, inventory and test fire dates listed next to each line item in the report are the same date the reports were printed. There were many instances where FCI Florence postdated its reports, meaning the test fire and inventory dates reported were after the print date. USP Florence postdated one inventory section of one report. Finally, FCI Tucson listed the same test fire date for up to 228 weapons. We found the reason incorrect dates were listed was due to limitations within SOS from which the required reports are generated. When the Security Officers create SOS reports, they have the option of electronically adding inspection dates prior to printing the report. However, they cannot choose a date for individual line items in the report. Rather, they choose four dates, one for each of the following sections: test fires; weapons inventory; chemical munitions inventory, which includes stun munitions; and general items inventory. The chosen date is listed next to every item in the section. As a result, the dates reported by the six institutions, which used electronically generated dates from SOS, were not accurate.

The option to include the electronic inspection dates creates a number of problems. FCI Englewood, ADX Florence, USP Tucson, and FCI Tucson all used the electronic inspection dates. As a result, for each section of the report, the same inspection date was listed next to each item in that section, implying that the Security Officer completed a multi-location inventory of hundreds of items or test fired hundreds of weapons in one day, which is highly unlikely. Some Security Officers indicated that this date marks the last day they completed the entire inventory and test fire. While this is a reasonable approach given the limits of the date function in SOS, using one date is not sufficient, because it does not document when the inventory and test fire actually occurred. In the instances where USP Florence and FCI Florence postdated their inspection dates, the Security Officer was attesting to an activity on a future date, which again is not sufficient to document when the inventory and test fire actually occurred.

The risk here is that an item can be excluded from the actual inventory and that item, along with all other items, will still be stamped with the same date indicating that the inventory was completed. Similarly, a weapon can be excluded from the actual test fire and the weapon, along with all other weapons, will still be stamped with a generic date indicating that the test fire was completed. We also noted that the ammunition section of the inventory section of the Quarterly Testing/Inventory Report did not include an inspection date column. This resulted in instances where there is no indication that the ammunitions were in fact inventoried. We discussed this issue with BOP's Central Office. Correctional Service Branch officials were not certain why the field was not included for ammunition.

Four institutions had a similar issue with the Annual Testing Report for Weapons. We reviewed each institution's most recent report and found that FCI Englewood, ADX Florence, USP Florence, and FCI Tucson list the same inspected date for every weapon at the institution. We determined that the dates

were not the dates of the actual test fires; rather, like the quarterly reports, the reports list a single date that was electronically generated by SOS. Again, using a generic date to document test fires is not sufficient, because it does not document when the test fires actually occurred and increases the likelihood that a weapon will be excluded from the actual test fire. Additionally, USP Tucson was not able to locate its most recent Annual Testing Report for Weapons. While BOP's correctional services policy requires the annual test fire to be documented, it does not indicate how long this document must be retained. This appears to be a policy oversight; therefore, we recommend BOP update its policies to include the retention requirement for the Annual Testing Report for Weapons.

Two institutions had weapons that are required to be test fired that were not included on the quarterly test fire report. According to BOP's correctional services policy, all weapons assigned to towers, patrol vehicles, tactical weapons, and buses must be test fired quarterly and all test fires must be documented. Generally speaking, this should be an opportunity to identify and correct any errors in SOS; specifically, weapons that should be included as part of the test fired but are not listed. We compared the list of weapons included on the most recent quarterly test fire report to all weapons listed on the institutions' armory inventory. FCI Englewood had four weapons assigned to ▇▇▇▇▇▇▇▇ not included on the report. The Security Officer stated that the accidental exclusion from the report does not exclude them from the actual test fire because he does not rely on the report to complete the test fire. ADX Florence had 24 ▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇ not included on the report. The Security Officer stated this was an error that needed to be corrected. When weapons are excluded from the test fire report, it creates one of two problems. Either weapons are actually test fired, but the test fire is not documented, or the test fires are not being completed as required.

Finally, three of the errors we identified during our physical inventory, which are detailed below, should have been identified during the quarterly physical inventories but were not.

- Since at least January 2013, ADX Florence has incorrectly carried 43,000 rounds of ▇▇▇▇▇▇▇▇▇▇ on its inventory and attested to having this inventory on every quarterly report that we reviewed. However, the rounds are actually the property of USP Florence and included on its inventory. This issue appears to be the result of the fact that ▇▇▇▇▇▇▇▇▇▇▇▇ ▇▇▇▇▇▇▇▇▇▇ to store the same types of ammunition, and ADX Florence mistakenly identified the ammunition as its own.

- In preparation for transferring two weapons, chemical agents, and general items from the armory to a ▇▇▇, ADX Florence added the items to the ▇▇▇ inventory but did not remove the items from the armory inventory. As a result, the items were listed in both locations on its May 2015 quarterly inventory report. Again, ADX Florence attested to having this inventory, despite the fact that one location did not have the items.

- Finally, each of FCI Englewood's quarterly reports that we reviewed included an ███████████████████ that was disposed in 1996. This error was the result of the fact that there was another ███████ on hand; however, the Security Officer did not notice it had a different FPS-ID.

The concern here is that the signed quarterly inventory reports are providing false assurances that the armory munitions and equipment inventory is accurate.

For all inspection, inventory, and test fire reports, the Security Officer has the option of running the reports without inspection information, which leaves a blank space under the inspected date column on the printed report. This allows the Security Officer to handwrite the inspected date on each line item, providing greater assurance that inspection, inventory, or test fire took place. FCI Phoenix completed its quarterly reports using this method, and both FCI Phoenix and FCI Florence completed their annual test fires reports using this approach. In order to address the risks associated with electronic dating and errors like the ones that we identified, we recommend that BOP require institutions to print the Quarterly Testing/Inventory Report and the Annual Testing Report for Weapons with no inspection dates and to handwrite the date of each test fire or inspection on the report, including ammunition. We also recommend that this same practice be extended to the Monthly Inventory Report, which are subject to the same potential problems. By implementing this recommendation, BOP will provide additional assurance that if there are errors in SOS, like those outlined above, the errors will be identified and presumably corrected.

We also found eight instances where the institutions either did not complete a report, completed a report late, or did not properly complete a report. FCI Englewood did not complete the April 2014 and September 2014 monthly inspection reports; however, the institution did complete quarterly inventory reports in those months, which covers the same group of items listed in the monthly reports. FCI Englewood also did not complete the January 2014 quarterly report and it completed three quarterly reports, including July 2013, October 2013, and July 2014, 1 month, 2 months, and 6 months late respectively. ADX Florence completed its April 2015 quarterly inventory report in May 2015. Finally, FCI Florence's March 2015 monthly inspection report was missing a Captain's signature. In our judgment, the issues we identified were not frequent or widespread; therefore, we offer no recommendation here.

Accuracy of BOP's Armory Munitions and Equipment Inventory

As part of our site-work, we conducted physical inventories to determine whether the armories are properly tracking their current armory munitions and equipment. We counted a sample of active armory munitions and equipment located throughout the institution, as well as all expired munitions. We compared the physical counts to the counts recorded in SOS. We identified inventory errors at five of the institutions. Some of the errors were indicative of larger control or compliance issues, while others resulted from collocating inventory and mixing up inventory.

Inventory Errors

We identified a total of 13 inventory errors, which are summarized by institution below.

FCI Englewood

- FCI Englewood's inventory report included a specific badge located in ███ ; however, the badge was actually located in a ████████ . The Security Officer explained that the officers who checkout ███████████████ ███████ , can mix up the badges.

- FCI Englewood's inventory report included 294 ██████████ rounds with a July 2019 expiration date located in MSTC's inventory; however, there were actually 363 rounds. The Security Officer stated that he stores all of MSTC's items together; however, 69 rounds were stored with FCI Englewood's expired munitions because there was not enough room in MSTC's storage space. As a result, the rounds were inadvertently excluded from the count.

- FCI Englewood's inventory report included 30 expired ██████████ ; however, there were actually 50 ████████ . The Security Officer indicated that this was a clerical error that occurred when the items were moved from the active to expired inventory.

- FCI Englewood's inventory report included an ██████████████████ located in a ██████████████████████ with an FPS-ID number that did not match the FPS-ID number on the actual item. The FPS-ID on the inventory report was for a ████████ that was disposed in 1996 and the ████████ we saw was acquired in 2012; however, FCI Englewood's inventory was never updated.

- FCI Englewood's inventory report included a cell phone located in the ████████████ with an FPS-ID number that did not match the FPS-ID number on the actual item. The FPS-ID on the inventory report was for a cell phone that was disposed in 1999 and the cell phone we saw was acquired in 2015; however, FCI Englewood's inventory was never updated.

ADX Florence

- ADX Florence's inventory report included 16 ██████████████████ in an ██████████████████ ; however, there were actually 6 ████████ . The Security Officer explained and provided documentation showing that there have always been 6 ████████ in the ███ . He does not believe they changed the quantity in SOS and he did not know why the quantity changed.

- ADX Florence's inventory report included 60,000 rounds of ████████████ ███ training ammunition in an ██████████████████ ; however, there were actually 62,500 rounds. The Security Officer explained that the discrepancy was the result of a clerical error.

- ADX Florence's inventory report included 83,000 rounds of ███ ██████████████ in an ██████████████████; however, there were actually 40,000 rounds of ████████████████████.[12] The Security Officer explained and we confirmed that ADX Florence inadvertently counted as its own 43,000 rounds of ██████████████████ that were the property of USP Florence and located in a ██████████████.

- ADX Florence's inventory report included two ██████████ in the armory; however, there was only one ██████████. The Security Officer explained that the second ██████ was located at USP Florence, because the USP had a greater need for the item.

FCI Phoenix

- FCI Phoenix's inventory report included 35 expired ██████████████; however, there were actually 30 ██████████. The Security Officer stated that it was likely a clerical error, but could not identify the specific issue. Additional supporting documentation seemed to indicate that 30 ████████ was the correct number.

FCI Tucson

- FCI Tucson inventory report included one expired ██████████████████████; however, there were no expired munitions. The Security Officer explained that the institution does not store expired munitions. He created a fictitious test record and planned to delete the record from SOS.

USP Tucson

- USP Tucson's inventory report included two specific ██████████ in the ██████████ ██████████; however, there were actually two different ████████ in that location. The Security Officer explained that the weapons were switched with weapons from another weapons' case the last time they were checked out of the armory.

- USP Tucson's inventory report included 107 ████████████████████ with an April 2019 expiration date in the armory; however, there were actually 105 ██████. The Security Officer explained he recently transferred two ████████ to FCI Tucson, but did not update SOS.

We notified the Security Officers and the institutions' management of these errors while we were on-site. In many instances, the errors are indicative of larger issues and are further detailed throughout the report. As a result, we offer no recommendations here.

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[12] ADX Florence's incorrectly changed the description for this ammunition from ██████████ in May 2015. That error existed on the inventory until ADX Florence updated the quantity from 83,000 to 40,000 in July 2015. The ammunition description was changed back to ████ at the same time.

We note, however, that two of the errors, specifically ADX mistakenly including 43,000 rounds of USP Florence's ammunition on its inventory and FCI Englewood excluding 69 [REDACTED] rounds from MSTC inventory, highlight the challenges of collocating inventories. We understand that institutions, particularly complexes or facilities with responsibilities beyond their primary mission, face logistical challenges. Nonetheless, collocation of inventory increases the risk of inventory errors.

In response to the inventory errors that we identified, the Security Officers provided verbal and written explanations, based on their knowledge of prior events. In many instances, the explanations provided by the Security Officers indicate that the physical inventory issues identified in this section resulted from inputting the wrong information into SOS or failing to update SOS; however, without historical data or other supporting documentation, we cannot confirm that these issues were in fact clerical and not the result of a more significant issue, such as lost, stolen, or missing items. Again, our inability to audit this information demonstrates the limits of the current inventory system and underscores the importance of BOP capturing this information moving forward.

Conclusion

BOP needs to improve its controls over and compliance with its requirements for tracking, issuing, and reporting on both active and expired armory munitions and equipment. Without sufficient controls and practices over this sensitive property, BOP cannot assure that its armory munitions and equipment are adequately safeguarded. Most significantly, the deficiencies we identified increase the risk that BOP armory munitions and equipment could be lost, misplaced, or stolen without being detected.

Recommendations

We recommend that BOP:

1. Require armories to maintain a log documenting the date and purpose of every change to the armory munitions and equipment inventory along with a running balance of the quantity on hand.

2. Require expired munitions to be included as a part of the armories' monthly inspections and quarterly inventories.

3. Require institutions to update SOS to include the FPS-ID for all controlled property.

4. Require institutions to reconcile SOS and SPMS at least annually.

5. Ensure that all [REDACTED] are tagged and included in SPMS.

6. Update the Arms/Equipment Issue Form to include the authorizing official's written signature and the name/title and written signature of the person who can attest to whether or not all expendable items were used.

7. Ensure that Security Officers properly complete Arms/Equipment Issue Forms for anything removed from the armory, including items issued to the Security Officer.

8. Require institutions to dispose of all ██████████████████, or add ██████████████████ to the list of authorized munitions.

9. Ensure that FCI Tucson's ██████████████ ammunition is either disposed or evaluated and explicitly authorized.

10. Update the correctional services policy by eliminating manufacturer-specific names and product codes, adding munitions that are authorized by BOP but not included in the policy, and providing a range of specifications for each munition.

11. Require the armories to use the standard naming conventions for weapons, ammunition, and chemical agents and stun munitions, and ensure the standard names clearly tie to the authorized use and minimum standards.

12. Update its policies with specific guidance for FCC armories regarding minimum inventory requirements.

13. Update its policies to include the retention requirement for the Annual Testing Report for Weapons.

14. Require institutions to print the Monthly Inventory Report, Quarterly Testing/Inventory Report, and the Annual Testing Report for Weapons with no inspection dates and handwrite the date of each test fire or inspection on the report, including ammunition.

STATEMENT ON INTERNAL CONTROLS

As required by the *Government Auditing Standards*, we tested, as appropriate, internal controls significant within the context of our audit objectives. A deficiency in an internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to timely prevent or detect: (1) impairments to the effectiveness and efficiency of operations, (2) misstatements in financial or performance information, or (3) violations of laws and regulations. Our evaluation of BOP's internal controls was *not* made for the purpose of providing assurance on its internal control structure as a whole. BOP management is responsible for the establishment and maintenance of internal controls.

As noted in the Findings and Recommendations section of this report, we identified deficiencies in BOP's internal controls that are significant within the context of the audit objectives and based upon the audit work performed that we believe adversely affect BOP's ability to track armory munitions and equipment. As a result, BOP cannot ensure that its assets are safeguarded from receipt through disposition.

Because we are not expressing an opinion on BOP's internal control structure as a whole, this statement is intended solely for the information and use of BOP. This restriction is not intended to limit the distribution of this report, which is a matter of public record.

STATEMENT ON COMPLIANCE
WITH LAWS AND REGULATIONS

As required by the *Government Auditing Standards* we tested, as appropriate given our audit scope and objectives, selected transactions, records, procedures, and practices, to obtain reasonable assurance that BOP's management complied with federal laws and regulations, for which noncompliance, in our judgment, could have a material effect on the results of our audit. BOP's management is responsible for ensuring compliance with applicable federal laws and regulations. In planning our audit, we did not identify laws and regulations that concerned the operations of the auditee and that were significant within the context of the audit objectives.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The objectives of our audit were to evaluate: (1) BOP's controls over armory munitions and equipment, (2) the institutions' compliance with policies governing armory munitions and equipment, and (3) the accuracy of BOP's armory munitions and equipment inventory.

Scope and Methodology Section

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.

Our audit covers activity in BOP's armories from October 2012, the beginning of fiscal year 2013, through December 2015. To accomplish our objectives, we interviewed BOP's Central Office personnel. This included officials from the Correctional Services Branch who are responsible for issuing guidance to BOP's armories, as well as officials from the Systems Development Branch, Acquisitions Branch, Trust Fund Branch, and the Learning and Career Development Branch. We reviewed BOP's formal policies and procedures related to armory operations and armory munitions and equipment. This included program statements, operations memoranda, and technical references. Our primary references were the current ███, the current Property Management Manual dated May 2004, and the associated Change Notices. Additionally, we evaluated the forms and reports used by the armories. This included the Arms/Equipment Issue Form, as well as the periodic inspection, inventory, and test fire reports generated by SOS.

We also conducted site-work at seven BOP armories, as shown in Table 4. These sites were judgmentally selected because we wanted to look at different types of institutions, including FCIs, USPs, and an ADX. We also wanted to see how armories operate across different security levels and regions. Finally, we wanted to see how FCCs manage multiple armories.

Table 4

BOP Armories Selected For Review

Institution/Armory	Location	Security Level	BOP Region
FCI Englewood	Littleton, CO	Low	North Central
FCI Florence	Florence, CO	Medium	North Central
USP Florence	Florence, CO	High	North Central
ADX Florence	Florence, CO	Administrative	North Central
FCI Phoenix	Phoenix, AZ	Medium	Western
FCI Tucson	Tucson AZ	Medium	Western
USP Tucson	Tucson, AZ	High	Western

Source: BOP

The purpose of our site-work was to examine the institutions' compliance with BOP's policies and procedures and to determine whether or not the armory inventories were accurate. We interviewed officials at each institution, including the Security Officer and armory staff, inventory management specialists, and members of the DCT and SORT. We reviewed the results of the institutions' operational and program reviews, which are part of BOP's management control program. We also reviewed each armories' monthly inspection reports, quarterly test fire and inventory reports, annual inventory reports, annual test fire reports, and annual SPMS inventory reports for controlled property located at the armory. In addition, we evaluated armory-specific internal control procedures.

Using inventory reports generated by SOS, we compared the weapons, ammunition, and chemical agent and stun munition inventory to BOP's lists of authorized armory munitions and equipment and required minimum inventory. We compared SOS and SPMS records for items tracked through both systems. We also conducted a number of tests to determine if a judgmentally selected sample of armory munitions and equipment were properly tracked from purchase through disposition. This included analyzing a sample of purchases to ensure they were properly authorized, adequately supported, and recorded in SOS as part of the armories' inventory. We evaluated Arms/Equipment Issue Forms for DCT and SORT training. We also identified inventory changes from one quarter to the next and reviewed the associated supporting documentation.

Finally, we conducted a physical inventory of a sample of armory munitions and equipment. This included verifying the existence of a sample of active items from each armory's master inventory report, as well verifying the existence of all expired munitions from each armory's expired munitions report. We also selected a sample of items while on-site and traced those items back to SOS and SPMS (if applicable) to determine if the inventory records were complete. In this effort, we employed a judgmental sampling design, which focused on high value and high risk items stored at locations throughout the institution. However, this non-statistical sample design does not allow a projection of the test results for physical inventory.

BOP'S ARMS/EQUIPMENT ISSUE FORM

BP-A0594
FEB 11
U.S. DEPARTMENT OF JUSTICE

ARMS/EQUIPMENT ISSUE CDFRM

FEDERAL BUREAU OF PRISONS

INDIVIDUAL RECEIPTS SHALL BE PREPARED FOR EACH EMPLOYEE RECEIVING EQUIPMENT OR WEAPONS. ALL ENTRIES WILL PRINTED/TYPED EXCEPT FOR SIGNATURE.

AUTHORIZING OFFICIAL IN ITEM 1, MAY BE EITHER THE WARDEN, ASSOCIATE WARDEN, CAPTAIN, OR LIEUTENANT (S).

After equipment, weapon (s) or expendable items have been accounted for and all information/signatures on this receipt have been completed, the issuing Lieutenant or Locksmith will give the receiving employee a copy of this receipt and forward the original to the Captain's office for review. Retention for this form is, current six months plus previous two years.

1.   AUTHORIZING OFFICIAL:_____

2.   PURPOSE OF ISSUE:_____

3.   EMPLOYEE RECEIVING EQUIPMENT/WEAPONS:_____

4.   WEAPONS: Specify – Type, Serial Number, Rounds of Ammunition

_____
_____
_____
_____
_____
_____

5.   OTHER EQUIPMENT OR EXPENDABLE ITEMS ISSUED (specify):

_____
_____
_____
_____
_____
_____

6.   Date/Time Issued: _____

7.   Date/Time Returned: _____

The expendable items were all used _____(yes or no), or

amount returned_____ Initials_____

8.   Printed name/title and written signature of **issuing officer.**

_____

9.   Printed name/title and written signature of **receiving staff:**

_____

10. Printed name/title and written signature of **receiving officer.**

Original – Armory (after Captain review);

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BOP'S RESPONSE TO THE DRAFT REPORT

U.S. Department of Justice

Federal Bureau of Prisons

Office of the Director   _Washington, D.C. 20534_

March 30, 2016

MEMORANDUM FOR JASON R. MALMSTROM
                ASSISTANT INSPECTOR GENERAL
                FOR AUDIT

Thomas R. Kane

FROM: Thomas R. Kane, Acting Director
             Federal Bureau of Prisons

SUBJECT: Response to the Office of Inspector General's
             Formal Draft Audit Report: Audit of the Federal
             Bureau of Prisons' Armory Munitions and Equipment

The Bureau of Prisons (Bureau) appreciates the opportunity to
respond to the open recommendations from the formal draft report
entitled, Audit of the Federal Bureau of Prisons' Armory
Munitions and Equipment.

As detailed below, the Bureau agrees with the recommendations of
the Office of Inspector General (OIG), and appreciates the
investigators' reliance on evidence through observations, review
of policies and procedures, and interviews with Bureau staff in
formulating recommendations regarding Bureau Armory Munitions
and Equipment.

Below please find the Bureau's response to each recommendation:

Recommendation #1: Require armories to maintain a log
documenting the date and purpose of every change to the armory
munitions and equipment inventory along with a running balance
of the quantity on hand.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the documentation process regarding armory inventory and will inform OIG of our plan and projected implementation date.

Recommendation #2: Require expired munitions to be included as a part of the armories' monthly inspections and quarterly inventories.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the documentation process regarding all armory inventories and will inform OIG of our plan and projected implementation date.

Recommendation #3: Require institutions to update SOS to include the FPS-ID for all controlled personal property.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the accounting for controlled property located in the armory and will inform OIG of our plan and projected implementation date.

Recommendation #4: Require institutions to reconcile SOS and SPMS at least annually.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the accounting and reconciliation of controlled property located in the armory and will inform OIG of our plan and projected implementation date.

Recommendation #5: Ensure that all ████████ are tagged and included in SPMS.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the accounting for controlled property located in the armory and will inform OIG of our plan and projected implementation date.

Recommendation #6: Update the Arms/Equipment Issue Form to include the authorizing official's written signature and the name/title and written signature of the person who can attest to whether or not all expendable items were used.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to update the forms and will inform OIG of our plan and projected implementation date.

2

Recommendation #7:   Ensure that Security Officers properly complete Arms/Equipment Issue Forms for anything removed from the armory, including items issued to the Security Officer.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to ensure the completion of the forms and will inform OIG of our plan and projected implementation date.

Recommendation #8:   Require institutions to dispose of all █ █████████████ , or add ███████████████████████ to the list of authorized munitions.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to resolve this recommendation regarding ████████████████████████ and will inform OIG of our plan and projected implementation date.

Recommendation #9:   Ensure that FCI Tucson's ████ ████████████████ ammunition is either disposed or evaluated and explicitly authorized.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to resolve this recommendation regarding the ammunition and will inform OIG of our plan and projected implementation date.

Recommendation #10:   Update the correctional services policy by eliminating manufacturer-specific names and product codes, adding munitions that are authorized by BOP but not included in the policy, and providing a range of specifications for each munition.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to resolve this recommendation regarding the policy requirements and related references and will inform OIG of our plan and projected implementation date.

Recommendation #11:   Require the armories to use the standard naming conventions for weapons, ammunition, and chemical agents and stun munitions, and ensure the standard names clearly tie to the authorized use and minimum standards.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the documentation process regarding armory equipment and munitions and will inform OIG of our plan and projected implementation date

3

Recommendation #12: Update its policies with specific guidance for FCC armories regarding minimum inventory requirements.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to resolve this recommendation and will inform OIG of our plan and projected implementation date.

Recommendation #13: Update its policies to include the retention requirement for the Annual Testing Report for Weapons.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to determine the means to resolve this recommendation and will provide further details in the status update.

Recommendation #14: Require institutions to print the Monthly Inventory Report, Quarterly Testing/Inventory Report, and the Annual Testing Report for Weapons with no inspection dates and handwrite the date of each test fire or inspection on the report, including ammunition.

Initial Response: The Bureau agrees with this recommendation. We are exploring options to optimize the documentation process regarding armory inventory and will inform OIG of our plan and projected implementation date.

If you have any questions regarding this response, please contact Steve Mora, Assistant Director, Program Review Division, at (202) 353-2302.

4

OFFICE OF THE INSPECTOR GENERAL
ANALYSIS AND SUMMARY OF ACTIONS
NECESSARY TO CLOSE THE REPORT

The OIG provided a draft of this audit report to BOP. BOP's response is incorporated in Appendix 3 of this final report. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendation:

1. **Require armories to maintain a log documenting the date and purpose of every change to the armory munitions and equipment inventory along with a running balance of the quantity on hand.**

   Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the documentation process regarding armory inventory.

   This recommendation can be closed when we receive documentation showing that BOP's armories are required to maintain a log documenting the date and purpose of every change to the armory munitions and equipment inventory along with a running balance of the quantity on hand.

2. **Require expired munitions to be included as a part of the armories' monthly inspections and quarterly inventories.**

   Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the documentation process regarding all armory inventories.

   This recommendation can be closed when we receive documentation showing that BOP's expired munitions are required to be included as a part of the armories' monthly inspections and quarterly inventories.

3. **Require institutions to update SOS to include the FPS-ID for all controlled property.**

   Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the accounting for controlled property located in the armory.

   This recommendation can be closed when we receive documentation showing that BOP's institutions are required to update SOS to include the FPS-ID for all controlled property.

4. **Require institutions to reconcile SOS and SPMS at least annually.**

   <u>Resolved.</u> BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the accounting and reconciliation of controlled property located in the armory.

   This recommendation can be closed when we receive documentation showing that BOP's institutions are required to reconcile SOS and SPMS at least annually.

5. **Ensure that all** ▮▮▮▮▮▮ **are tagged and included in SPMS.**

   <u>Resolved.</u> BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the accounting for controlled property located in the armory.

   This recommendation can be closed when we receive documentation showing that BOP has ensured that all ▮▮▮▮▮▮ are tagged and included in SPMS.

6. **Update the Arms/Equipment Issue Form to include the authorizing official's written signature and the name/title and written signature of the person who can attest to whether or not all expendable items were used.**

   <u>Resolved.</u> BOP concurred with our recommendation. BOP stated in its response that it is exploring options to update the forms.

   This recommendation can be closed when we receive documentation showing that BOP has updated the Arms/Equipment Issue Form to include the authorizing official's written signature and the name/title and written signature of the person who can attest to whether or not all expendable items were used.

7. **Ensure that Security Officers properly complete Arms/Equipment Issue Forms for anything removed from the armory, including items issued to the Security Officer.**

   <u>Resolved.</u> BOP concurred with our recommendation. BOP stated in its response that it is exploring options to ensure the completion of the forms.

   This recommendation can be closed when we receive documentation showing that BOP has ensured that Security Officers properly complete Arms/Equipment Issue Forms for anything removed from the armory, including items issued to the Security Officer.

8. **Require institutions to dispose of all ███████████████, or add █**
    ███████████████ to the list of authorized munitions.

    Resolved. BOP concurred with our recommendation. BOP stated in its
    response that it is exploring options to resolve this recommendation
    regarding ████████████.

    This recommendation can be closed when we receive documentation showing
    that BOP's institutions are required to dispose of all ████████████████, or
    add ████████████████ to the list of authorized munitions.

9. **Ensure that FCI Tucson's ████████████████ ammunition is either**
    disposed or evaluated and explicitly authorized.

    Resolved. BOP concurred with our recommendation. BOP stated in its
    response that it is exploring options to resolve this recommendation
    regarding the ammunition.

    This recommendation can be closed when we receive documentation showing
    that BOP has ensured that FCI Tucson's ████████████████ ammunition is
    either disposed or evaluated and explicitly authorized.

10. **Update the correctional services policy by eliminating**
    manufacturer-specific names and product codes, adding munitions
    that are authorized by BOP but not included in the policy, and
    providing a range of specifications for each munition.

    Resolved. BOP concurred with our recommendation. BOP stated in its
    response that it is exploring options to resolve this recommendation
    regarding the policy requirements.

    This recommendation can be closed when we receive documentation showing
    that BOP has updated the correctional services policy by eliminating
    manufacturer specific names and product codes, adding munitions that are
    authorized by BOP but not included in the policy, and providing a range of
    specifications for each munition.

11. **Require the armories to use the standard naming conventions for**
    weapons, ammunition, and chemical agents and stun munitions, and
    ensure the standard names clearly tie to the authorized use and
    minimum standards.

    Resolved. BOP concurred with our recommendation. BOP stated in its
    response that it is exploring options to optimize the documentation process
    regarding armory equipment and munitions.

    This recommendation can be closed when we receive documentation showing
    that BOP's armories are required to use the standard naming conventions for
    weapons, ammunition, and chemical agents and stun munitions, and ensure

the standard names clearly tie to the authorized use and minimum standards.

12.   Update its policies with specific guidance for FCC armories regarding minimum inventory requirements.

Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to resolve this recommendation.

This recommendation can be closed when we receive documentation showing that BOP has updated its policies with specific guidance for FCC armories regarding minimum inventory requirements.

13.   Update its policies to include the retention requirement for the Annual Testing Report for Weapons.

Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to determine the means to resolve this recommendation.

This recommendation can be closed when we receive documentation showing that BOP has updated its policies to include the retention requirement for the Annual Testing Report for Weapons.

14.   Require institutions to print the Monthly Inventory Report, Quarterly Testing/Inventory Report, and the Annual Testing Report for Weapons with no inspection dates and handwrite the date of each test fire or inspection on the report, including ammunition.

Resolved. BOP concurred with our recommendation. BOP stated in its response that it is exploring options to optimize the documentation process regarding armory inventory.

This recommendation can be closed when we receive documentation showing that BOP's institutions are required to print the Monthly Inventory Report, Quarterly Testing/Inventory Report, and the Annual Testing Report for Weapons with no inspection dates and handwrite the date of each test fire or inspection on the report, including ammunition.

REDACTED – FOR PUBLIC RELEASE