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Geoffrey A. Cherrington  
Inspector General





# Office of Inspector General

## **Audit of WMATA's Control and Accountability of Firearms and Ammunition**

**OIG 18-01  
August 3, 2017**

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# M E M O R A N D U M

SUBJECT: Audit of WMATA's Control and Accountability  
of Firearms and Ammunition

DATE: August 3, 2017

FROM: OIG – Geoff Cherrington /S/

TO: GMGR – Paul J. Wiedefeld

This attached Final Report, entitled *Audit of WMATA's Control and Accountability of Firearms and Ammunition*, presents the results of our audit. The audit objective was to determine whether WMATA has adequate control and accountability of firearms and ammunition. WMATA staff generally concurred with the findings and recommendations.

Please provide information on actions taken or planned on each of the recommendations within 30 days of the date of this report. OIG intends to make the final report publically available, including the written comments that you provided.

We appreciate the cooperation and assistance extended by your staff during the audit. Should you or your staff have any questions, please contact me or Stephen Dingbaum.

## Attachment

cc: COO – J. Leader  
CFO – D. Anosike  
COUN – P. Lee  
INCP – E. Christensen



# Results in Brief

OIG 18-01  
August 03, 2017

## Why We Did This Review

Metro Transit Police Department (MTPD) is responsible for a variety of law enforcement and public safety functions in transit facilities throughout the Washington D.C. Metropolitan area. The mission of MTPD is to provide protection for Metro patrons, personnel, transit facilities, and revenue.

To support the mission, MTPD established the Firearms Training Unit responsible for the safe and secure storage of MTPD issued firearms and ammunition. Issued firearms include any type of revolver, semi-automatic pistol, shotgun, rifle, machine gun or any other gun owned or authorized by WMATA and MTPD.

Armory personnel (Armors) are responsible for the purchase, storage, inventory, and maintenance of the department's firearms. As a result, controls are established to ensure MTPD personnel safeguard and control issued firearms.

The audit objective was to determine whether WMATA has adequate control and accountability of firearms and ammunition.

## Audit of WMATA's Control and Accountability of Firearms and Ammunition

### What We Found

To MTPD's credit, the Office of Inspector General (OIG) was able to account for all firearms in our sample; however, opportunities exist to further strengthen controls and accountability of firearms and ammunition. Specifically, improvements are needed in (2) segregation of duties, and (3) inventory controls over ammunition.

Weak segregation of duties may result in undetected misappropriations of firearms and ammunition.

While the dollar value of a firearm may not be large, a Washington Metropolitan Area Transit Authority (WMATA)-owned firearm used in a homicide or other criminal activity would be tragic and could be a public relations debacle.

This report makes six recommendations to improve the control and accountability over WMATA's firearms and ammunition program.

### Management's Response

WMATA provided written comments to this report on July 28, 2017 (see Appendix B). MTPD and Chief Financial Officer (CFO) generally concurred with the findings and the Other Matters of Concern, and agreed to implement the recommendations or accept certain risks. Regarding Recommendations 3 through 5, management indicated they have implemented mitigating controls as well as accepts the risks posed by the lack of segregation of duties. Corrective actions will be completed in Fiscal Year 2018.

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## ABBREVIATIONS AND ACRONYMS

ABBREVIATION	DESCRIPTION
AMB	Asset Management Branch
ARMORER	Armory Personnel
CFO	Chief Financial Officer
ENGA	Engineering and Architecture
█	█
GAO	Government Accountability Office
GM/CEO	General Manager/Chief Executive Officer
IDS	Intrusion Detection System
MTPD	Metro Transit Police Department
OIG	Office of Inspector General
PRMT	Office of Procurement and Materials
SPO	Special Police Officers
WMATA	Washington Metropolitan Area Transit Authority

## BACKGROUND

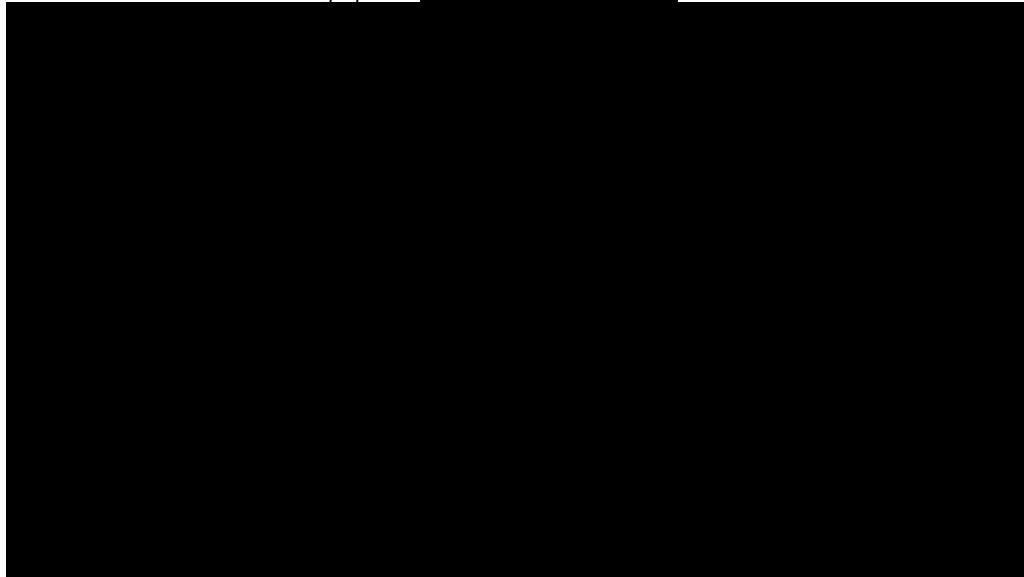
The MTPD was established on June 4, 1976. MTPD officers are authorized to carry firearms and have a variety of law enforcement and public safety functions in transit facilities throughout Washington, D.C., and surrounding Virginia and Maryland areas. As of May 2017, MTPD personnel consisted of 401 transit police officers, 140 special police officers (SPOs), and 70 civilian employees. MTPD officers are authorized to carry their weapons 24 hours a day seven days a week. MTPD SPOs assigned to the Jackson Graham Building and armored car drivers are issued firearms while on duty; however, these firearms are stored at their work location when not on duty.

As of January 2017, MTPD had an inventory of [REDACTED] firearms. MTPD firearms include [REDACTED] Transit police officers carry [REDACTED]; and SPOs carry [REDACTED]. The Special Weapons and Tactics Response Team are assigned [REDACTED]

WMATA's regulations require an annual audit of all firearms. Verification to determine if MTPD officers have in their possession the firearm issued to them is conducted annually during firing range qualifications and unannounced periodic checks at roll-call.

MTPD maintains an extensive supply of ammunition.<sup>1</sup> In January 2017, MTPD reported [REDACTED] cases of ammunition stored at the armory for duty use, firing range qualification, and training purposes. Unassigned firearms and ammunition are stored at [REDACTED] (See Photograph 1.)

Photograph 1 - [REDACTED]



<sup>1</sup>Ammunition means ammunition or cartridge cases, primers, bullets or propellant powder designed for use in any firearm.

The following WMATA departments are responsible for procuring, approving, managing and controlling aspects of MTPD's firearms and ammunition program:

- **MTPD** – MTPD's Administrative Service Bureau provides administrative, clerical, training, and planning support to members of the police department. The bureau is responsible for human resources functions, basic and in service training, crime analysis and records retention, fleet management, and quarter master services. The Firearms Training Unit is responsible for the safe and secure storage of the department's firearm inventory, as well as maintenance and repair. Each officer is responsible for safeguarding their assigned firearms and ammunition. The 2017 operating budget for the unit totaled over \$1,376,000.

The armory within [REDACTED] is managed by two armorers, who are responsible for maintaining the armory, accessing firearms and ammunition inventories, and conducting inspections.

[REDACTED]

- **Engineering and Architecture (ENGA)**<sup>2</sup> – ENGA is responsible for WMATA's infrastructure maintenance, engineering, and oversight. Officials from this group reviewed the as-built plans for [REDACTED] for compliance with WMATA standards. In addition, ENGA engineers also design infrastructure physical security systems.
- **Office of Procurement and Materials (PRMT)** – PRMT is authorized to purchase ammunition required by MTPD, but not firearms.
- **The Chief Financial Officer (CFO), Asset Management Branch (AMB)** – AMB is responsible for tracking WMATA assets, to include "sensitive items." Sensitive items such as firearms and ammunition should be accounted for by AMB.

## Prior Reviews

There have been no prior reviews of MTPD's firearms and ammunition controls.

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<sup>2</sup>This department was formerly known as Chief Engineer Infrastructure Services.



## AUDIT OBJECTIVE AND RESULTS

### *Audit Objective*

The audit objective was to determine whether WMATA has adequate control and accountability of firearms and ammunition.

### *Audit Results*

To MTPD's credit, the OIG was able to account for all firearms in our sample; however, opportunities exist to further strengthen controls and accountability of firearms and ammunition. Specifically, improvements are needed in [REDACTED] (2) segregation of duties, and (3) inventory controls over ammunition. Additionally, the Chief Financial Officer (CFO) does not maintain an inventory of firearms and ammunition as required for sensitive items.

[REDACTED] Weak segregation of duties may result in undetected misappropriations of firearms and ammunition. [REDACTED]

[REDACTED] While the dollar value of a firearm may not be large, a WMATA-owned firearm used in a homicide or other criminal activity would be tragic and could be a public relations debacle.

## FINDINGS AND RECOMMENDATIONS

### Finding 1 – [REDACTED]

While WMATA implemented some security functions at [REDACTED] This occurred because WMATA did not conduct a risk assessment, or implement all available security functions. [REDACTED]

#### *What Is Required*

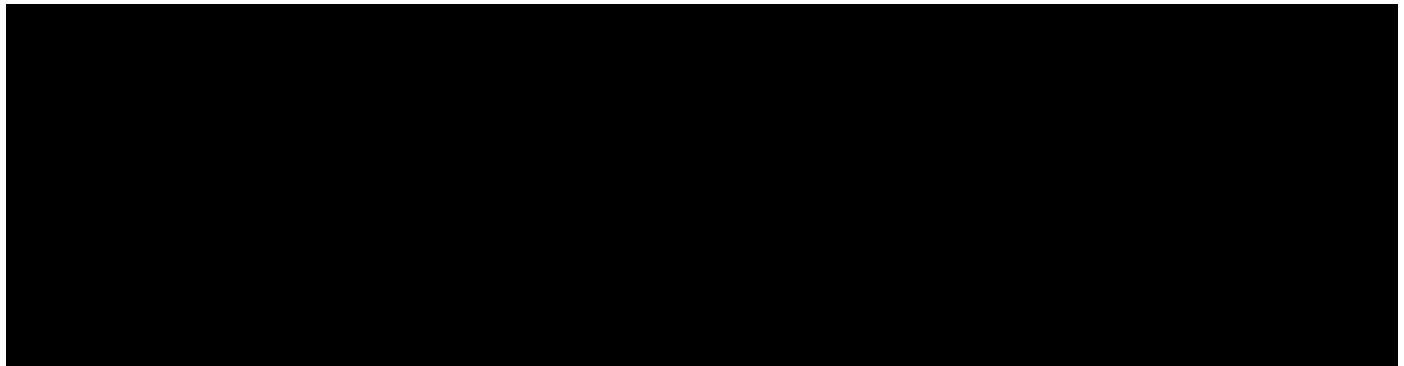
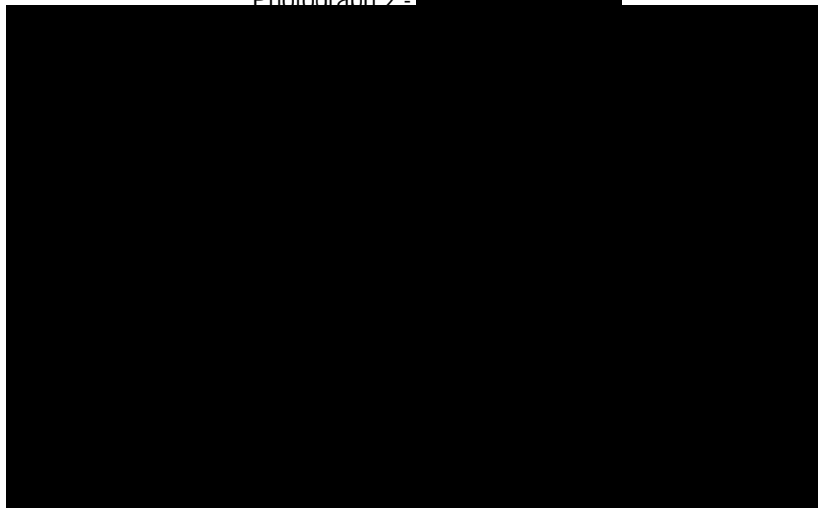
The Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, dated September 2014, Section 10.03 requires “Management establishes physical control to secure and safeguard vulnerable assets. Examples include security for and limited access to assets ... that might be vulnerable to risk of loss or unauthorized use.”

#### *What We Found*

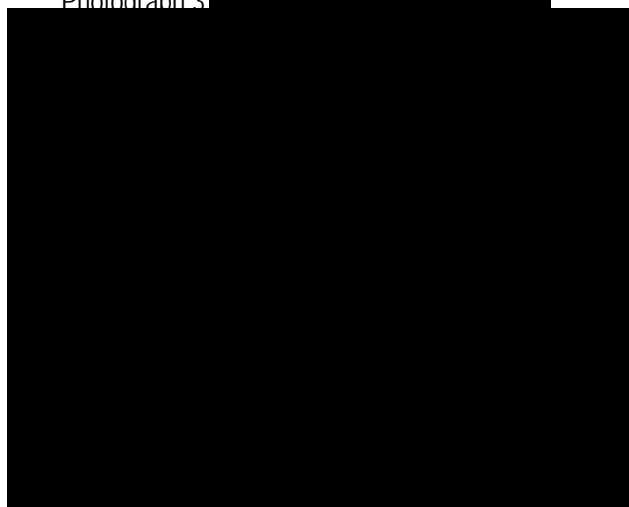
While [REDACTED] implemented some security functions such as [REDACTED]  
[REDACTED]  
[REDACTED]

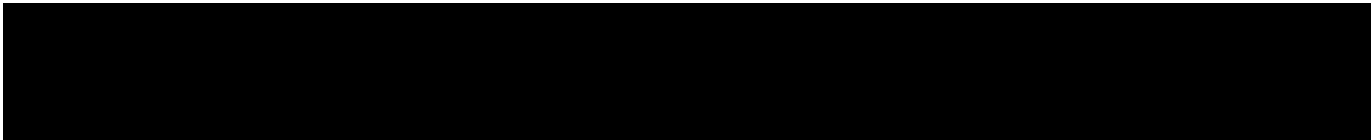
<sup>3</sup>Findings rated as High, Medium, and Low risk require management corrective actions to strengthen internal processes and provide for more effective and efficient operations.

Photograph 2 - [REDACTED]

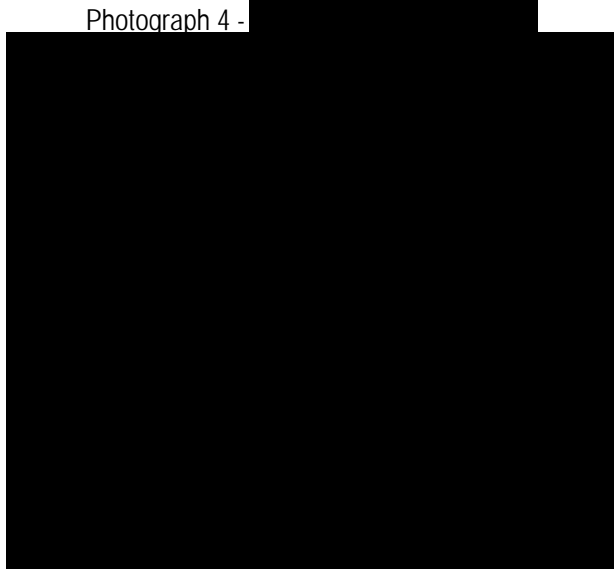


Photograph 3 [REDACTED]





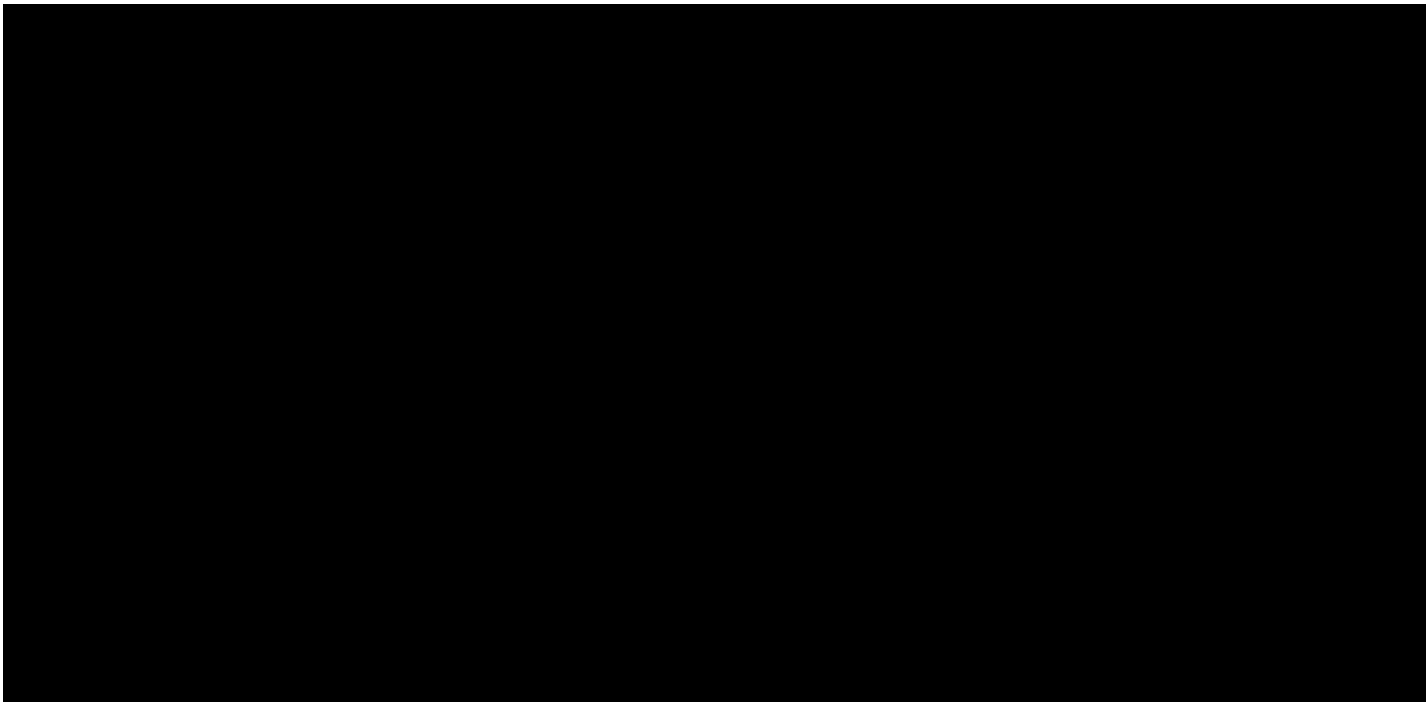
Photograph 4 -



#### *Why This Occurred*

The following contributed to the conditions cited in this finding.

- *Risk Assessment Not Conducted* – WMATA did not perform a threat and vulnerability assessment in Fiscal Year 2015 because [REDACTED] As of May 2017, we were told WMATA commenced a vulnerability and threat assessment [REDACTED]



### *Why This Is Important*

### *Recommendations*

We recommend the General Manager/Chief Executive Officer (GM/CEO):

1. Conduct a risk assessment [REDACTED]  
[REDACTED] (Action: Chief of Police) (*Risk – High*)
2. Based on the outcome of the risk assessment and best practices, [REDACTED]  
[REDACTED] (Action: Chief of Police)  
(*Risk – High*)

**Finding 2 – Inadequate Segregation of Duties (Risk – High)**

The MTPD did not adequately segregate duties and responsibilities of armorers. Both armorers have access to firearms and ammunition inventories, for counting, verifying, and documenting inventory amounts. These duties are incompatible as there are sometimes no checks and balances. This occurred because of limited resources, no formal training, and no policies on segregation of duties. Without proper segregation of duties, firearms and ammunition are at risk of being lost or stolen without detection.

**What Is Required**

Segregation of duties is a commonly used and widely accepted business practice, which entails dividing or segregating key duties and responsibilities among different people.

GAO, *Standards for Internal Control in the Federal Government*, dated September 2014, Section 10.03 states, "Management divides or segregates key duties and responsibilities among different people to reduce the risk of error, misuse, or fraud. This includes separating the responsibilities for authorizing transactions, processing and recording them, reviewing the transactions, and handling any related assets so that no one individual controls all key aspects of a transaction or event."

GAO, *EXECUTIVE GUIDE, Best Practices in Achieving Consistent, Accurate Physical Counts of Inventory and Related Property*, dated March 2002, states, "In situations where segregation of duties is not practical or cost-effective, other controls should be employed to mitigate the recognized risk. Such mitigating control procedures include 'blind counts',<sup>5</sup> increased supervision, and applying dual control by having activities performed by two or more people." To mitigate against the risk, the person performing the physical count should not be involved in custodial activities such as ordering, receiving and storing physical assets.

**What We Found**

MTPD did not adequately segregate the duties of armorers.

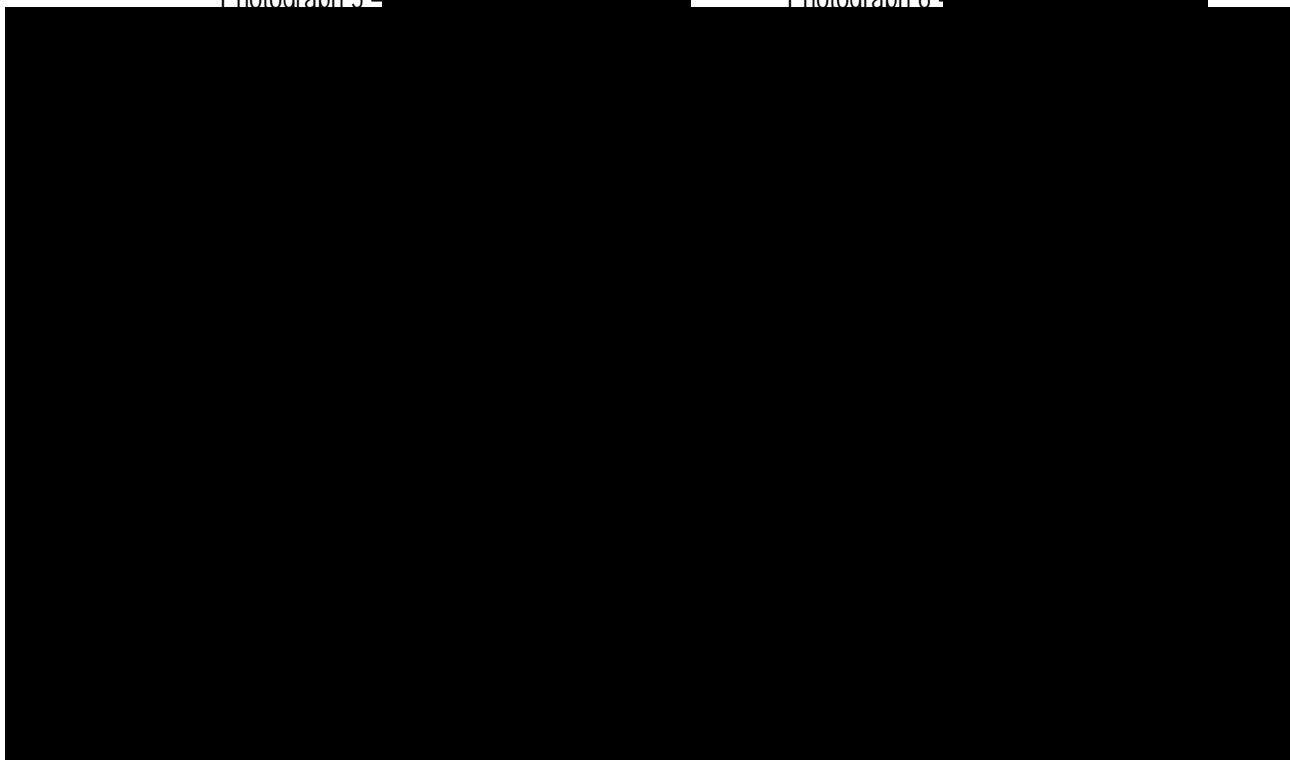
- Armorer duties include maintaining the MTPD armory, such as physical access to all areas of the armory. (See Photographs 5 and 6.)

<sup>5</sup>Blind counts' means that the counter does not know how many items are supposed to be there before or during the count process.

- Armorers, who have access to firearms and ammunition inventories, also have responsibilities for counting, verifying, distributing and documenting inventory<sup>6</sup> amounts.

Photograph 5 –

Photograph 6 –



- An armorer, who has access to the ammunition inventories, also has responsibilities for ordering, receiving, distributing, and inventorying ammunition. However, PRMT purchases ammunition for MTPD.

While the armorers generally appeared competent and diligent, their duties are incompatible as there are sometimes no checks and balances. The audit did not reveal any fraudulent activities; however, the risk of fraud and/or abuse is greatly enhanced under this structure.

#### *Why This Occurred*

The following instances contributed to the conditions cited in the finding.

- *Limited Resources* – MTPD only has two armorers who have similar duties. MTPD is actively looking to recruit a civilian armorer to reduce the amount of sworn resources in that role.
- *No Formal Training* – While the armorers had informal training on inventory controls, they had no formal training on segregation of duties.<sup>7</sup>

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<sup>6</sup>The 2016 physical firearms inventory review was conducted by an armorer and a retired officer.

<sup>7</sup>Segregation of duties training is covered in recommendation 5.

- *No Policies and Procedures* – MTPD does not have written policies and procedures for segregation of duties or compensating controls when segregation of duties is not possible.

### *Why This Is Important*

Without proper segregation of duties, firearms and ammunition are at risk of being lost or stolen without detection. Proper segregation of duties reduces the risk of misappropriation of assets and non-detection of recording errors. In addition, it protects the armorers if a firearms or ammunition is lost or stolen.

### *Recommendation*

We recommend the GM/CEO:

3. Develop and implement segregation of duty controls with adequate resources, including appropriate risk mitigation strategies. (Action: Chief of MTPD)(*Risk – High*)



**Finding 3 – Inadequate Ammunition Controls (Risk – Medium)**

To MTPD's credit, the OIG was able to account for 140 firearms in our sample. [REDACTED]

This condition occurred because WMATA did not have formal policies and procedures for ammunition inventory and did not provide formal training for the armorers. [REDACTED]

***What Is Required***

WMATA's General Order 131, *Firearms*, dated January 19, 2012, states the Armorer will "Secure firearms received from supervisors and range officers" and "Conduct a yearly audit ...." Further, the armorer position description under Essential Functions states, the armorer will "Maintain inventory of all departmental weapons and less lethal systems" and "Conduct annual inspections of department-issued weapons...." Regarding ammunition, the position description requires the armorer to "Maintain inventory and control of range supplies" and "Order range supplies within budget guidelines."

GAO, *EXECUTIVE GUIDE, Best Practices in Achieving Consistent, Accurate Physical Counts of Inventory and Related Property*, dated March 2002, states, "Managing the acquisition, production, storage, and distribution of inventory is critical to controlling cost, operational efficiency, and mission readiness. Proper inventory accountability requires that detailed records of produced or acquired inventory be maintained, and that this inventory be properly reported ...."

***What We Found*****Firearms**

MTPD has established adequate accountability controls over firearms. One hundred and forty firearms sampled were accounted for as follows.

- 56 firearms assigned to officers were in their possession;
- 3 firearms were reported as either missing (one weapon), lost (one weapon), or stolen (one weapon);
- 40 firearms were validated at the armory; and
- 41 firearms were documented as disposed of in 2012 to a private firm.



## **OTHER MATTERS OF CONCERN (*Risk - Low*)**

The CFO's, Office of Accounting, AMB does not maintain an inventory of firearms and ammunition. *The Property Accounting/Control Policies and Procedures Manual*<sup>9</sup> dated June 30, 1995, provides sensitive items are "... items costing \$100 or more that are susceptible to theft or loss." Sensitive items such as firearms and ammunition should be accounted for.

### ***Why This Occurred***

A CFO official indicated the Office of the CFO does not handle accountability records for WMATA's firearms and ammunition as this function is under MTPD's purview. However, the AMB did not have a formal policy assigning MTPD the responsibility to track firearms and ammunition.

### ***Why This Is Important***

By formally assigning the inventory function, WMATA will have a single point of accountability over firearms and ammunition.

### ***Recommendations***

We recommend the GM/CEO:

6. Determine whether the AMB or MTPD will be responsible for the official inventory of firearms and ammunition and update policies and procedures with that decision. (Action: Chief Financial Officer) (*Risk - Low*)

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<sup>9</sup>A January 2016 Asset Management Manual was drafted, but has not been finalized or disseminated.

## CONSOLIDATED LIST OF RECOMMENDATIONS

We recommend the GM/CEO:

1. Conduct a risk assessment [REDACTED]  
[REDACTED] (Action: Chief of Police) (*Risk – High*)<sup>10</sup>
2. Based on the risk assessment and best practices, [REDACTED]  
[REDACTED] (Action: Chief of Police) (*Risk – High*)
3. Develop and implement segregation of duty controls with adequate resources, including appropriate risk mitigation strategies. (Action: Chief of MTPD) (*Risk – High*)
4. Develop and implement inventory controls for ammunition, including requisite policies and procedures. (Action: Chief of Police) (*Risk – Medium*)
5. Conduct training [REDACTED], segregation of duties, and controls over ammunition. (Action: Chief of Police) (*Risk – High*)
6. Determine whether the Asset Management Branch or MTPD will be responsible for the official inventory of firearms and ammunition, and update policies and procedures with that decision. (Action: Chief Financial Officer) (*Risk - Low*)

<sup>10</sup>Recommendations are rated as High, Medium, or Low risk and require management corrective actions to strengthen internal processes and provide for more effective and efficient operations

**High** - Exception is material to accomplishing organization objectives. Corrective action by appropriate Senior Management is required. Resolution would help avoid loss of material assets, reputation, critical financial information or ability to comply with critical laws, policies or procedures.

**Medium** - Exception may be material to accomplishing organization objectives. Corrective action is required and the results are reported to management quarterly. Resolution would help avoid negative impact on the unit's assets, financial information, or ability to comply with important laws, policies, or procedures.

**Low** - Exception has a minor impact on the accomplishment of organization objectives but may result in inefficient operations. Resolution would help improve controls and avoid inefficient operations within the unit.

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## **SUMMARY OF MANAGEMENT'S RESPONSE**

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WMATA provided written comments to this report on July 28, 2017 (see Appendix B). MTPD and CFO generally concurred with the findings and the Other Matters of Concern, and agreed to implement the recommendations or accept certain risks. Regarding Recommendations 3 through 5, management indicated they have implemented mitigating controls as well as accepts the risks posed by the lack of segregation of duties. The Firearms Training Unit, Standard Operating Procedure referred to in management's response has been updated to include ammunition inventory provisions, but has not been issued in final. Corrective actions will be completed in Fiscal Year 2018.

The OIG considers management's comments responsive to the recommendations in the report and corrective actions taken or planned should resolve the issues identified in the report.

## OBJECTIVE, SCOPE, AND METHODOLOGY

### *Objective*

The audit objective was to determine whether WMATA has adequate control and accountability of firearms and ammunition.

### *Scope*

The scope of the audit covered firearms and ammunition records effective January 1, 2015 through December 31, 2016. The audit was conducted at WMATA's Jackson Graham Building and [REDACTED]. Our review commenced January 13, 2017, and fieldwork ended May 5, 2017.

### *Methodology*

To accomplish our audit objective, OIG:

- Reviewed WMATA's general orders, Policy Manuals, and standard operating procedures.
- Interviewed managers and staff members from MTPD, CENI, CFO, and PRMT.
- Reviewed criteria including prior OIG reports and relevant industry best practices and standards.
- Examined safety measures and key accountability controls for firearms and ammunition, including separation of duties.
- Selected a random sample of firearms and examined ammunition to assess inventory accountability and completeness.
- Reviewed employee separation practices at MTPD.
- Conducted site visits at MTPD facilities, including [REDACTED] and the Security Operations Control Center.
- Reviewed chain of custody controls and determined whether control breaches are reported, investigated, and resolved properly.

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

To assess the reliability of the sampled data, we performed tests to determine whether various data elements matched source documents. We also performed a physical count of the firearms and ammunition inventories contained in the armory. The data utilized to support the findings contained in this report was sufficiently reliable.

We held an exit conference on May 30, 2017, to discuss the preliminary findings from the audit with the Chief of Police and other WMATA officials.

## MANAGEMENT'S RESPONSE

# M E M O R A N D U M



SUBJECT: Response to OIG's Draft Audit  
Report of WMATA's Control and  
Accountability of Firearms and  
Ammunition

DATE: July 28, 2017

FROM: GMGR/CEO – Paul J. Wiedersheim [REDACTED]

TO: OIG – Geoff Cherrington

The following includes management responses provided by MTPD and the CFO to OIG's Draft Audit Report of WMATA's Control and Accountability of Firearms and Ammunition. Please see the attached approved responses. MTPD provided management responses to recommendations 1 through 5, while the CFO provided a management response to recommendation 6.

Please note that the MTPD response includes a request to have certain information and all pictures redacted from the report due to the sensitive nature of these items. This response package includes a copy of the draft OIG report with sections highlighted for your consideration. Please contact Chief Pavlik directly with any questions.

# M E M O R A N D U M



SUBJECT: Response to OIG's Draft Audit of WMATA's Control and Accountability of Firearms and Ammunition No. 18-XX DATE: July 11, 2017

FROM: CFO – Dennis Anosike [REDACTED]

THRU: GM/CEO – Paul J. Wiedefeld

TO: OIG – Geoff Cherrington

The following represents the Chief Financial Officer's response to OIG's Draft Audit of WMATA's Control and Accountability of Firearms and Ammunition.

## **OIG Recommendation 6**

Determine whether the AMB or MTPD will be responsible for the official inventory of firearms and ammunition and update policies and procedures with that decision.

## **Management's Response:**

Management accepts this recommendation. MTPD will be responsible for inventorying firearms and ammunition. OCFO will update the Asset Management Policy and Instruction (P/I) to identify/define sensitive items and assign responsibility for inventory and control of those materials to the appropriate department by November 1, 2017.





Metro  
Transit  
Police  
Department

# M E M O R A N D U M

SUBJECT: Audit of WMATA's Control and Accountability of Firearms and Ammunition

DATE: July 7, 2017

FROM: MTPD – Ronald Pavlik [REDACTED]

TO: COO – Joseph Lee [REDACTED]

## Overview:

The Office of Inspector General (OIG) conducted a comprehensive audit of the Metro Transit Police Departments (MTPD) [REDACTED] firearms and ammunition in January 2017. There were various findings and recommendations for improvement, specifically in the following three areas:

- Segregation of Duties
- Inventory Controls Over Ammunition

Due to the sensitive nature of the information contained in the report, the MTPD is requesting that certain information and all pictures be redacted from the report. By releasing information about quantities of firearms and ammunition as well as [REDACTED] to the public, this will unduly present a security hazard to the Authority.

## Findings:

### Finding #1 – [REDACTED]

While WMATA implemented some security functions at [REDACTED]

This occurred because WMATA did not conduct a risk assessment, or implement all available security functions. [REDACTED]

## Recommendation:

We recommend the General Manager/Chief Executive Officer (GM/CEO):

1. Conduct a risk assessment [REDACTED]  
[REDACTED] (Action: Chief of Police) (Risk - High)

2. *Based on the outcome of the risk assessment and best practices,*

**MTPD Response to Finding #1**

As a part of the normal business practice within the MTPD a threat and vulnerability assessment (TVA) is conducted every three years at each WMATA owned facility to comply with Homeland Security Grant requirements. The construction of the [REDACTED] was not complete when the last WMATA wide TVA was conducted. In 2016, the MTPD contracted with Elert and Associates to complete the next TVA over calendar years 2017 and 2018. The risk assessment for the [REDACTED] is currently scheduled to be completed by Elert and Associates in January 2018.

Based on the outcome of the TVA, the MTPD will assess the impact and likelihood of each identified risk, to determine the consequences and probability of those risks the TVA identifies. The MTPD will then assess whether or not the existing policies, procedures and protection items in place are adequate. The results will be the basis for selecting appropriate security measures to be put in place or to remove those that are ineffective. Depending on the cost and resource allocation needed for any recommendations, the MTPD may need to make budget adjustments. The risk information will then be used to prioritize the implementation of any corrective action protective measures along with what level of risk is acceptable to the organization.

**Finding #2 – Inadequate Segregation of Duties**

*The MTPD did not adequately segregate the duties and responsibilities of the armorers. Both armorers have access to firearms and ammunition inventories, for counting, verifying, and documenting inventory amounts. These duties are incompatible as there are sometimes no check and balances. This occurred because limited resources, no formal training, and no policies on segregation of duties. Without proper segregation of duties, firearms and ammunition are at risk of being lost or stolen without detection.*

**Recommendation:**

*We recommend the GM/CEO:*

3. *Develop and implement segregation of duty controls with adequate resources, including appropriate risk mitigation strategies. (Action: Chief of MTPD) (Risk – High)*

**MTPD Responding to Finding #2**

The MTPD has taken steps to mitigate this risk. Neither armorer has any purchasing authority. The Departments armorers forecast what the Department [REDACTED]

needs for the upcoming training cycle, based on what was used in the previous years; the anticipated training requirements and round counts for open range and schools; as well as what is required by state training mandates. When ordering ammunition, the departmental armorer submits a request through procurement for the quantity, manufacturer and caliber. Procurement then reviews the order and the Procurement Contracts Administrator places the order to the vendor. When the ammunition is shipped, both armorers have authorization to sign for it and they place it into inventory.

As the ammunition is used, the round count is documented on Range Daily Check Sheets.

In addition, the department's policy is to conduct annual audits on firearms and those results, findings and recommendations are published through channels to the Chief of Police. These audits consist of several layers to reduce the likelihood of fraud and to increase accountability. As an example, the weapons assigned to members in the field are maintained by the officers, the serial numbers are verified by first line supervisors; the serial numbers are confirmed and entered into a database by the armorers; and the results of this data is then forwarded through each level of supervision to the Chief of Police in the form of an annual audit report.

MTPD has identified the training course *"Inventory Management Techniques: Planning, Replenishment and Activities Control"* that the Departmental armorers and Training Division's Commander will attend in December 2017.

Due to the size of the facility, staffing limitations allocated to the Training Division, along with the requisite knowledge required to identify different weapons, ammunition and components, and the steps the MTPD has taken steps to mitigate this risk, the department accepts the risk that the lack of segregation of duties pose.

### **Finding #3 – Inadequate Ammunition Controls**

To MTPD's credit, the OIG was able to account for 140 firearms in our sample.

This condition occurred because WMATA did not have formal policies and procedures for ammunition inventory and did not provide formal training for the armorers.

### **Recommendation:**

We recommend the GM/CEO:

4. Develop and implement inventory controls over ammunition, including requisite policies and procedures> (Action: Chief of Police) (Risk – Medium)

5. Conduct training on [REDACTED] segregation of duties and controls over ammunition. (Action: Chief of Police) (Risk – High)

**MTPD Response to Finding #3**

The MTPD began tracking the ammunition expended during training at the [REDACTED] in calendar 2016 after [REDACTED] opened. Similarly, the MTPD established a policy for the inventory of ammunition and ordering when this facility opened. This policy is enumerated in the Firearms Training Unit Special Operating Procedures (SOP) in sections: F. Ammunition; and V. Responsibilities, A. Range Master. Once the facility became operational, the firearms training staff began to track the number of rounds expended during a training session on log sheets for both range one and two.

The forecast of departmental ammunition needs is predicated on several factors. Those factors include, mandates from the law enforcement certification bodies in Maryland, Virginia and the District Columbia's Office of Security Officers Management Branch (SOMB); the individual skill levels of different shooters, as well as operational needs for different training programs where MTPD officers and instructors participate. [REDACTED]

**Other Matters of Concern:**

The CFO's, Office of Accounting, AMB does not maintain an inventory of firearms and ammunition. The Property Accountability/Control Policies and Procedures Manual dated June 30, 1995, provides sensitive items are....."items costing \$100 or more that are susceptible to theft or loss". Sensitive items such as firearms and ammunition should be accounted for.

**Recommendation:**

We recommend the GM/CEO:

6. Determine whether the AMB or MTPD will be responsible for the official inventory of firearms and ammunition and update policies and procedures with that decision. (Action: Chief Financial Officer) (Risk – High)

## TO REPORT FRAUD, WASTE, OR ABUSE

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Please Contact:

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