



*To enhance mission performance, TSA is committed to promoting a culture founded on its values of Integrity, Innovation and Team Spirit.*

**REVISION:** This revised directive supersedes TSA MD 200.56, *ROS for Lost, Damaged, Stolen, or Destroyed Government Personal Property*, dated January 30, 2006.

**SUMMARY OF CHANGES:** Section 3, Authorities, added Office of Financial Management Guidance. Section 4, Definitions, added accountable personal property and capitalized personal property, clarified language for gross negligence, added simple negligence, and eliminated thumb drives from sensitive property. Section 6, Policy, added badges and credentials, and corrected reporting date to DHS. Throughout document, set the lower limit for capitalized property to \$25,000 and added clarifying language where appropriate. Removed all attachments.

1. **PURPOSE:** This directive establishes TSA policy and procedures for completing a Report of Survey (ROS) for lost, damaged, destroyed, or stolen TSA-owned and leased personal property.
2. **SCOPE:** This directive applies to all TSA employees.
3. **AUTHORITIES:**
  - A. Aviation and Transportation Security Act, Public Law 107-71
  - B. 41 C.F.R. § 101, Federal Property Management Regulations
  - C. 41 C.F.R. § 102, Federal Management Regulation System
  - D. DHS MD 0565, Personal Property Management
  - E. Office of Financial Management Guidance, *Requirement for the Capitalization Threshold*, dated January 8, 2009
4. **DEFINITIONS:**
  - A. Accountable Personal Property: Personal property with an initial acquisition cost at, or above, \$5,000, and/or items designated as sensitive that are recorded in the TSA Property Management System of Record, Sunflower Asset Management System (SAMS)<sup>1</sup>.
  - B. Accountable Property Officer (APO): The individual responsible for the accountability and control of personal property within his/her jurisdiction. This responsibility may be a collateral duty designated to an individual with a different title within the organization.
  - C. Administratively Controlled Property: Items below \$5,000 that are not recorded as sensitive, and which are subject to reasonable controls relative to property values.

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<sup>1</sup> The system of record for firearms and Pads is the Federal Air Marshal Identification System, controlled by OLE/FAMS.

- D. Approving Official: An individual with final authority to approve findings and recommendations contained in Reports of Survey.

**NOTE:** The Approving Official cannot serve as a PC, APO, Survey Officer, or Survey Board member.

- E. Board of Survey: A three to five member panel, appointed in writing by the PMO, to investigate and review the circumstances surrounding LDD of accountable personal property as noted in Section 6D. The appointment can be on a permanent or as-required basis.

**NOTE:** The PC, APO, Approving Official, or ROS initiator cannot serve on the Board.

- F. Capitalized Personal Property: Personal property with an initial acquisition cost at or above \$25,000 that is entered on the agency's general ledger records as a major investment or asset.

- G. Deputy Property Management Official (DPMO): A senior field representative of the Office of Property Management (OPM) and serves as the local subject matter expert and liaison for personal property management within his/her accountable area.

- H. Gross Negligence: An extreme departure from the course of action to be expected of a reasonably prudent person with regard for Government personal property. This may include behavior that is reckless, deliberate, or in complete disregard for the consequences of such behavior and may indicate willful misconduct.

- I. Personal Property: Tangible property (equipment, materials, and supplies) that can be moved from place to place.

- J. Property Custodian (PC): The individual assigned physical responsibility for the proper use, maintenance, and protection of property assigned to a particular custodial area. The designation of PC may or may not correspond with the individual's official job title.

- K. Property Management Officer (PMO): The designated agency official responsible for ensuring compliance with internal policies and Government-wide regulations regarding the acquisition, receipt, accountability, utilization, distribution, and disposal of personal property.

- L. Report(s) of Survey (ROS): An administrative process that investigates and accounts for the loss, damage, destruction (LDD), or theft of accountable personal property. The ROS establishes pertinent facts, remedial measures, and the extent of an employee's responsibility for LDD or theft. ROS also refers to the formal report ([DHS Form 200-2, Report of Survey](#)) that documents the ROS proceeding, which includes the recommendations of the Survey Officer or Board of Survey, and the decision of the Approving Official.

- M. Sensitive Personal Property: Personal property that includes all items, regardless of value, which require special control and accountability due to unusual rates of loss, theft or misuse, or due to national security or export control considerations. Such property includes weapons, ammunition, explosives, information technology equipment with memory capability, cameras, and communications equipment.

- N. Simple Negligence: The omission to do something which a reasonable person, guided by the ordinary considerations that regulate human affairs, would do under the circumstances, or the doing of something which a reasonable and prudent person would not do.
- O. Survey Officer: An individual formally appointed by the PMO to investigate and report the circumstances surrounding LDD of accountable personal property (unless the PMO appoints a Board of Survey as noted in Section 4E). The appointment can be on a permanent or as-required basis.

**NOTE:** The PC, APO, Approving Official, or ROS initiator cannot serve as a Survey Officer.

## **5. RESPONSIBILITIES:**

A. The PMO is responsible for:

- (1) Managing personal property within TSA, which includes accounting for property, exercising oversight of inventory, designating excess property, and participating in the contracting function;
- (2) Appointing Boards of Survey and Survey Officers in writing, and other officials described in Section 6;
- (3) Reporting to DHS as required in Section 6J; and
- (4) Providing technical assistance to the Survey Officer and Board of Survey when needed, including information pertaining to the acquisition, use, value, age, and accountability of the property involved.
- (5) Contacting the proper investigative authorities when theft or fraud is suspected.

B. DPMOs are responsible for:

- (1) Receiving and reviewing the ROS from the APO for accountable personal property;
- (2) Acting as advisors to the APO for the ROS process as needed; and
- (3) Submitting all completed ROS for their assigned areas to the PMO within 10 days of the ROS being signed by the Approving Official.

C. APOs are responsible for:

- (1) Receiving and processing ROS from the PC and submitting them to the respective DPMO;
- (2) Ensuring all property transactions, including acquisitions, transfers, and disposals, are recorded in the designated accountable property system for accountability of property within his/her area of responsibility; and

- (3) Contacting TSA's Computer Security Incident Response Team (CSIRT) via email at [TSA-CSIRT@tsa.dhs.gov](mailto:TSA-CSIRT@tsa.dhs.gov) if any IT equipment with stored sensitive security information (SSI), classified data, or personal identifiable information (PII) are part of the ROS.

D. PCs are responsible for:

- (1) Maintaining current records for accountable property within the assigned custodial area;
- (2) Initiating or processing documents affecting the accountability or custody of equipment;
- (3) Ensuring authorized use and proper care and protection of the property;
- (4) Reporting missing, lost, destroyed or stolen property, or property damaged beyond normal wear and tear;
- (5) Preparing and coordinating ROS to document incidents regarding loss, damage, theft, or destruction of personal property;
- (6) Notifying Federal or local security officials, as appropriate, of adverse incidents relating to loss or theft, and preparing related documentation;
- (7) Ensuring police reports are generated for all off-side thefts, break-ins, vandalism, or other criminal acts involving government property, and that any police report is included in the ROS; and
- (8) Serving as an advisor to the PMO, APO, and Survey Officer or Board of Survey, and providing assistance as needed.

E. The Survey Officer is responsible for receiving ROS from the PMO and investigating and reporting on the circumstances surrounding the LDD of accountable personal property under \$25,000 as assigned.

F. The Board of Survey is responsible for:

- (1) Receiving ROS from the PMO, investigating and reviewing the circumstances surrounding the LDD;
- (2) Identifying and determining the root cost of the loss; and
- (3) Offering recommendations and methods to prevent similar losses to ensure continuous improvements in TSA's Property Management Practices.

G. The Approving Official is responsible for serving as the final authority in the approval process for ROS.

H. The Office of Security is responsible for reviewing and investigating field ROS in cases where break-in, theft, or vandalism is suspected.

- I. The Office of Chief Counsel is responsible for providing legal advice and guidance relative to matters covered by this directive.

**6. POLICY:**

- A. All TSA employees shall exercise prudence in providing proper care, use, and protection of all Government personal property in their physical possession, custody, or control. Government property shall only be used for Government purposes and not for personal or private use; employees must immediately report to superiors any lost, stolen, missing, damaged or destroyed government property.
- B. All TSA supervisors shall establish and enforce necessary administrative and security measures to ensure proper preservation and use of all Government personal property under their jurisdiction.
- C. An ROS shall be completed whenever Government personal property is LDD or stolen. ROS for leased property shall be reported to the Contracting Officer through the Contracting Officer Technical Representative with a copy sent to the PMO. If any IT equipment with stored SSI, classified data, or PII is part of the ROS, TSA's CSIRT at [TSA-CSIRT@tsa.dhs.gov](mailto:TSA-CSIRT@tsa.dhs.gov) shall be contacted for further instructions.
- D. The PMO shall appoint a Board of Survey if the ROS contains:
  - (1) Capitalized property;
  - (2) Incidents known or suspected to be the result of willful intent or gross negligence, regardless of the property value; or
  - (3) Sensitive property that the PMO decides warrants a Board of Survey review, on a case-by-case basis.
- E. A Board of Survey shall:
  - (1) Have one of the board members serve as Chairperson of the Board; and
  - (2) Exclude members from surveys when such involvement would trigger a real or apparent conflict of interest.
- F. Alternative investigative mechanisms (i.e., the DHS Office of the Inspector General, the Office of Inspections, the Office of Security Operations, or other official internal review authority) shall substitute for a Board of Survey when the mechanism provides a comprehensive review and a specific finding of responsibility (or no responsibility) and can be used as the basis to relieve property accountability and/or refer for action as appropriate.
- G. No individual shall perform the duties of PC, APO, DPMO, Survey Officer, or Board of Survey member if that individual may be responsible for the LDD of the Government personal property at issue. In such cases, the official shall be disqualified from taking any action normally taken by a person in that position in connection with the ROS. The higher authority

will appoint someone not associated with the loss to carry out the responsibilities of the disqualified official.

H. The appointment of the Approving Official shall be based according to estimated acquisition cost as follows:

- (1) Below \$5,000 and not sensitive: Federal Security Director (FSD) or Head of Office; or
- (2) All Accountable Personal Property: TSA PMO.

I. The provisions of this directive apply to all TSA personal property, except in instances involving:

- (1) Non-sensitive personal property items with an original acquisition value less than \$500.00, unless the property was damaged or destroyed as a result of a natural fire or disaster; or
- (2) Sensitive property such as badges, credentials, TSO uniforms with patches or cloth badges, badge shields, and rank insignia (shoulder boards). These items are governed and tracked by the issuing office, but will be subject to random audits by OPM.

J. Reporting Requirements:

- (1) Required Reports: Field element APOs shall submit to their DPMO all completed ROS (regardless of local approval or if reports meet the Board of Survey criteria) detailing the Government personal property lost, damaged, stolen, or destroyed within their area of responsibility. Headquarters APOs shall submit completed ROS to the PMO.
- (2) All ROS for lost weapons and data storage devices shall be reported to DHS by the PMO by the 15<sup>th</sup> of the following month after the ROS are completed. All other ROS shall be reported by the PMO to DHS quarterly.
- (3) Annual Reports: The DPMOs shall compile an annual report of all completed ROS and submit to the PMO. Annual reports are due to the PMO no later than November 1 for the prior fiscal year, and shall include the following:
  - (a) Unique identification number (e.g., bar code number, asset tag, or serial number);
  - (b) Item description;
  - (c) Total acquisition cost;
  - (d) Accountable locations;
  - (e) Completed ROS date;
  - (f) Status of actions taken (i.e. Survey Board initiated);
  - (g) Corrective measures taken to prevent repetition; and

- (h) The root causes of the lost and missing item, if known.
- (4) The PMO shall submit an official TSA LDD annual report to the DHS Office of Asset Management no later than November 30.
- (5) Cyclical Reports: At the end of any inventory cycle, ROS shall be initiated to account for any property that cannot be located during the physical inventory, and will be submitted to the DPMO for submission to the PMO, along with the inventory results, for reconciliation purposes. Reports will be validated and subsequently forwarded to the DHS Office of Asset Management.

## **7. PROCEDURES:**

### **A. ROS Process Initiation:**

- (1) Individuals are to contact their respective APO or PC immediately upon discovery of a discrepancy for property assigned to them or in their possession that is LDD. If contacted, the APO will contact the appropriate PC to start the ROS process.
- (2) If an ROS is warranted, the PC shall:
  - (a) Interview all employees with possible knowledge of the property;
  - (b) Ensure that all possible locations are thoroughly searched;
  - (c) Document all actions and contacts made to locate the property;
  - (d) Provide all relevant audit documentation with the ROS to substantiate the research performed; and
  - (e) Submit the ROS to the APO within five (5) working days of the date of initiation or receipt of the ROS.

### **B. ROS Research Process:**

- (1) The PC shall perform research for accountable personal property whenever there is an indication of weakness in property management procedures or an alleged misuse or mishandling of property.
- (2) The depth of research required shall be determined in accordance with the following guidelines. These guidelines must be applied using sound judgment to determine the extent to which records and documents will be reviewed:
  - (a) If the property is valued at less than \$500 and non-sensitive, a ROS is only prepared if the property was damaged or destroyed as a result of a natural fire or disaster. In these cases, minor research is required. This would entail review of the physical location and

a review of the transaction history to include receipt and/or issue documentation. The PC will attach research findings to the ROS.

- (b) If the property is of a value greater than \$500 or sensitive in nature, detailed research is required. This would require extensive review of transaction history and receipt and/or issue documentation. This research may include personal interviews, telephone interviews, and written investigations. The PC will attach research findings to the ROS.
- (c) Any predetermined problem area that received special attention during inventory taking or inventory planning requires detailed research.
- (d) Property with a history of reoccurring losses in a specific area requires detailed research.

**C. ROS Preparation:**

- (1) The ROS shall contain data obtained from preliminary investigations.
- (2) In preparing the ROS, the PC shall provide all information available.
- (3) When details of a loss can be determined (such as fire, break-in, theft, vandalism, damage to facilities or equipment etc.) explain fully the who, what, where, when, and why.
- (4) When a loss is due to a break-in, theft, or vandalism, a copy of the ROS shall be forwarded to the Office of Security.
- (5) When the facts relating to a loss cannot be determined, the following minimum information shall be provided on the ROS:
  - (a) The personal property item lost;
  - (b) Date item was reported lost;
  - (c) When the item was last seen or used;
  - (d) Date and location of other areas checked for possible property transfer, excess, or re-assignment;
  - (e) Name of the individual responsible for the use and protection of the missing item;
  - (f) Name of the individual who reported the item missing;
  - (g) Names of individuals and dates questioned regarding the missing item;
  - (h) A statement that a thorough search was conducted within the custodial area;
  - (i) The method used to query all employees regarding the missing item with attached written replies to queries or written reports of oral interviews;

- (j) A statement that the Office of Security was notified, as needed;
  - (k) If the item was outside the custodial area, attach a copy of the employee property hand receipt for the item;
  - (l) If the item was on loan, attach a copy of the hand receipt;
  - (m) Any actions taken to prevent a recurrence of unexplainable loss;
  - (n) Name of employee(s) who conducted the search; and
  - (o) Other related documentation pertinent to the search (i.e., item out for repair).
- (6) Once the ROS is prepared, the PC shall submit the ROS to the APO for review.

**D. APO Review:**

- (1) Upon receipt of the ROS from the PC, the APOs shall:
  - (a) Assign a ROS number to each report, establish a case file, and maintain complete records. ROS numbering format should be in the following schema: the 3 letter Airport Code or Office Code, the last two digits of the fiscal year, and a 4 digit serialized number assigned and tracked by the APO (Example: ABC-08-1234).
  - (b) If the property item is less than \$5,000 original acquisition value and is not sensitive in nature, submit the ROS to the FSD within five (5) working days of receipt of the ROS from the PC. Otherwise, submit ROS to DPMO for further review.
  - (c) Take action to remove the lost, stolen, or destroyed equipment from the property record immediately upon approval of the case by the Approving Official.
  - (d) Forward a completed copy of the signed ROS for all values (except TSO uniforms articles, described previously) to the assigned DPMO.
  - (e) Contact TSA's CSIRT ([TSA-CSIRT@tsa.dhs.gov](mailto:TSA-CSIRT@tsa.dhs.gov)) for further instructions if any IT equipment with stored SSI, classified data, or PII is part of the ROS.

**E. DPMO Review:**

- (1) Upon receipt of the ROS from the APO, DPMOs shall review the ROS for accuracy and completeness.
- (2) The DPMO will file the ROS for his/her records and forward a copy to the PMO for further action or signature.

**F. PMO Review:**

- (1) The PMO will review all ROS received from the respective DPMO. The PMO reviews all losses of sensitive personal property regardless of price, and decides on a case-by-case basis if referral to a Survey Officer or Board of Survey is warranted. The PMO may also refer the ROS to another internal Investigative authority where applicable.
- (2) The PMO will complete and sign Box 15 of the ROS after the Board of Survey or other internal Investigative authority makes its recommendations.
- (3) The PMO will send a completed copy of ROS for capitalized property to the United States Coast Guard Financial Center (FINCEN) for reconciliation purposes, with a courtesy copy sent to the TSA Office of Financial Management.
- (4) For all ROS received from the DPMOs that are not referred to a Board of Survey or other internal investigative authority, the PMO will complete and sign Box 15 for the ROS without further action.
- (5) The PMO will file for record ROS for all acquisition values.
- (6) The PMO will submit an official TSA LDD annual report to the DHS Office of Asset Management no later than November 30.

**G. Survey Officer and Board of Survey Investigation:**

- (1) The Survey Officer and Board of Survey researches and investigates the circumstances surrounding the LDD of the property. Research conducted by the formal Internal Review authorities such as the Office of Inspections may substitute for a Board of Survey.
- (2) Upon receipt of the ROS from the PMO, the Board of Survey shall:
  - (a) Conduct a thorough and impartial review to document and verify facts and circumstances that caused the adverse conditions involving LDD of government personal property.
  - (b) Make a concise statement based on the findings as to whether the loss was due to gross negligence; otherwise, the Board of Survey shall make a logical and reasonable recommendation to relieve party/parties from responsibility.
  - (c) Ensure all evidence, testimony, and other data considered during the investigation are clearly documented and attached to the original ROS.
  - (d) Issue a finding of either no responsibility or of employee and/or supervisory responsibility for each ROS after completion of the investigation.
  - (e) Finalize all ROS and submit back to the PMO within 60 calendar days from the date of receipt.

- (f) Ensure that employees involved have the opportunity to present their case in writing to the Survey Officer or Board of Survey during the course of the investigation and prior to any final determination.
- (3) An employee and/or supervisor is not to be held responsible for performing or failing to perform an action because of a reasonable error in judgment or a normal physical limitation.
- (4) When a finding of employee and/or supervisory gross negligence or misconduct is made, a recommendation that consideration be given for disciplinary action will be added to the report. For findings involving simple negligence, a recommendation for disciplinary action will be left to the Board's discretion.
- (5) When theft or fraud is suspected, the Office of Security shall be informed and provided all available evidence.
- (6) Information obtained during the review process, including findings and recommendations, shall be limited to personnel on a need-to-know basis.

**H. Approval Process:**

- (1) The Approving Official shall receive the ROS upon completion of the investigation and will either approve the findings and recommendation of the report within 15 calendar days of receipt, or direct further investigation by the PC, Survey Officer, or Board of Survey. ROS shall not be disapproved without this action. A ROS must remain in an open status until signed by the appropriate approving official.
- (2) Approved reports are returned to the APO and the case file closed when no fraud, theft, or gross negligence is involved.
- (3) In cases involving suspected fraud or theft, the APO case file shall remain open until completion of the investigation by the Office of Security, or until a written determination is provided from that office that no investigation will be conducted. The Office of Security shall provide the APO a written response reflecting the status/disposition of each case within 30 calendar days from their notification. This response should indicate if action on the case will or will not be taken and/or what information the investigation revealed that may help the Approving Official in the survey process.
- (4) In cases where disciplinary action is recommended, the Approving Official shall forward the findings of the Board to the supervisor of the individuals found to be responsible.
- (5) Within 30 calendar days from the date of the survey approval, the APO is required to inform the Approving Official of actions taken toward enacting recommendations made by the Survey Officer or Board of Survey.
- (6) Upon completion of the survey process, a copy of the approved ROS form will be forwarded by the APO to the assigned DPMO within 15 days.

- I. Update of Property Record: Property records shall be updated by the APO after the survey process has been completed and the case file is closed. The approved ROS form will be used as the means to document the audit trail.
- J. Records Management: ROS files and other papers used for adjustment of property records are to be disposed of in accordance with the TSA Records Disposition Schedules.

8. **EFFECTIVE DATE AND IMPLEMENTATION:** This directive is effective immediately upon signature.

**APPROVAL**

*Signed*

*4/17/2009*

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David R. Nicholson  
Assistant Administrator for Finance and  
Administration/Chief Financial Officer

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Date

Distribution: TSA Employees

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