

# OFFICE OF FINANCE AND ADMINISTRATION Property Management Division

# TSA MANAGEMENT DIRECTIVE No. 200.56 REPORTS OF SURVEY

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, *Reports of Survey*, dated July 28, 2014.

**SUMMARY OF CHANGES:** Section 4, Definitions, updates made to Property Custodian and Sensitive Property. Section 5, Responsibilities, Accountable Property Officer (APO) has been updated.

- **1. PURPOSE:** This directive establishes TSA policy for completing Reports of Survey (ROS) for lost, damaged, or destroyed (LDD) TSA-owned and leased personal property.
- 2. SCOPE: This directive applies to all TSA employees.

#### 3. AUTHORITIES:

- A. 41 CFR § 101, Federal Property Management Regulation
- B. 41 CFR § 102, Federal Management Regulation
- C. Aviation and Transportation Security Act (ATSA), Public Law 107-71, 49 U.S.C. 114(j)
- D. DHS MD 119-03, Personal Property Asset Management Program
- E. DHS MD 0810.1, The Office of Inspector General
- F. Financial Management Division (FMD) Internal Standard Operating Procedure (ISOP) 6009, Evaluate Reasonableness of Capitalization Threshold

## 4. **DEFINITIONS**:

- A. <u>Accountable Personal Property</u>: 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 Assets (Sunflower).
- B. <u>Accountable Property Officer (APO)</u>: 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. <u>Administratively Controlled Property</u>: Items below \$5,000 that are not recorded as sensitive, and which are subject to reasonable controls relative to property values.
- D. <u>Approving Official</u>: An individual with final authority to approve findings and recommendations contained in Reports of Survey (ROS).

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

E. <u>Board of Survey</u>: A three to five member panel, appointed in writing by the Property Management Official (PMO), to investigate and review the circumstances surrounding the loss, damage or destruction of accountable personal property as noted in Section 6D. The appointment can be on a permanent or as-required basis.

**NOTE:** The PC, APO, Deputy Property Management Official (DPMO), Approving Official, or ROS initiator cannot serve on the Board.

- F. <u>Capitalized Personal Property</u>: 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. <u>Deputy Property Management Official (DPMO)</u>: A senior field representative of the Property Management Division (PMD) and serves as the local subject matter expert and liaison for personal property management within his/her accountable area.
- H. <u>Gross Negligence</u>: 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. <u>Management Official</u>: The Assistant Secretary, Deputy Assistant Secretary, Assistant Administrator (AA), Office Director (OD), Area Director (AD), Special Agent in Charge (SAC), Federal Security Director (FSD), or designee responsible for directing the work of his/her employees to accomplish the mission of the organization.
- J. <u>Personal Property</u>: Tangible property (equipment, materials, and supplies) that can be moved from place to place.
- K. <u>Property Custodian (PC)</u>: 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 be an ancillary duty. The PC can either be federal or contract personnel.
- L. <u>Property Management Officer (PMO)</u>: 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. The Director of PMD serves as the PMO.
- M. <u>Rating Official</u>: The manager or supervisor who observes and/or has the knowledge and authority to evaluate the employee's overall performance during the performance period and prepares the employee's final rating.
- N. <u>Report of Survey (ROS)</u>: An administrative process that investigates and accounts for the 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 (<u>DHS Form 200-2</u>, <u>Report of Survey</u>) that documents the ROS proceeding,

- which includes the recommendations of the Survey Officer or Board of Survey, and the decision of the Approving Official.
- O. <u>Sensitive Personal Property</u>: Personal Property that requires special control and accountability, regardless of value, due to unusual rates of loss, theft or misuse, or due to national security or export control considerations. Examples of sensitive personal property include weapons, ammunition, explosives, and information technology equipment with memory capability (data storage for example, wireless devices and flash drives), camera and communications equipment.
- P. <u>Simple Negligence</u>: 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.
- Q. <u>Survey Officer</u>: An individual formally appointed by the PMO appropriate Management Official to investigate and report the circumstances surrounding LDD of accountable personal property (unless the PMO appoints a Board of Survey as noted in Section 6D). The appointment can be on a permanent or as-required basis.

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

R. <u>Transportation Security Equipment (TSE)</u>: National security equipment maintained by TSA for the purpose of safeguarding the traveling public and their goods.

#### 5. RESPONSIBILITIES:

- A. The Office of Inspection is responsible for reviewing and investigating all cases of employee misconduct as it pertains to LDD TSA-owned and leased personal property.
- B. Contracting Officers are responsible for reporting losses of government furnished property by a contracted employee to the PMO when reported by the Property Administrator, Contracting Officer's Representative or the Contractor.

**NOTE**: Ultimately, contract language determines how notifications are made.

- C. 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 6.

- (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.

# D. DPMOs are responsible for:

- (1) Providing guidance and assistance to APO's in the processing of lost, damaged, destroyed and stolen property.
- (2) Randomly reviewing locally controlled ROS during inventory campaigns or site visits.

## E. APOs are responsible for:

- (1) Receiving and processing ROS from the PC and submitting them to the TSA-Property@dhs.gov within ten (10) days after the event.
- (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.
- (3) Working with PMD during the closeout of the yearly inventory by providing signed ROS's in a timely manner to support DHS reporting requirements.
- (4) Maintaining current records for accountable property within the assigned custodial area.
- (5) Initiating or processing documents affecting the accountability or custody of equipment.
- (6) Ensuring authorized use and proper care and protection of the property.
- (7) Reporting LDD property or property damaged beyond normal wear and tear.
- (8) Preparing and coordinating ROS to document incidents regarding loss, damage, theft, or destruction of personal property.
- (9) Notifying Federal or local security officials, as appropriate, of adverse incidents relating to loss or theft, and preparing related documentation.
- (10) Ensuring police reports are generated for all off-site thefts, break-ins, vandalism, or other criminal acts involving government property, and that any police report is included in the ROS.
- (11) Serving as an advisor to the PMO, APO, and Survey Officer or Board of Survey, and providing assistance as needed.

# F. 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 LDD 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-site thefts, break-ins, vandalism, or other criminal acts involving government property, and that any police report is included in the ROS.
- (8) Serving as an advisor to the PMO, APO, and Survey Officer or Board of Survey, and providing assistance as needed.
- G. 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.

## H. 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.
- (3) Offering recommendations and methods to prevent similar losses to ensure continuous improvements in TSA's Property Management Practices.
- I. The Approving Official is responsible for serving as the final authority in the approval process for ROS.
- J. The Office of Law Enforcement/Federal Air Marshal Service, Physical Security Division is responsible for reviewing and investigating field ROS in cases where break-in, theft, or vandalism is suspected.
- K. The Office of Chief Counsel is responsible for providing legal advice and guidance relative to matters covered by this directive.

- L. The Rating Official is responsible for:
  - (1) Ensuring that rated employees present proof of accountability for all TSA property issued to them (e.g., Wireless devices and laptops) during all phases of the rating period.
  - (2) Ensuring that employees immediately initiate an ROS for any unaccounted for TSA-issued property.

## 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, unless specifically permitted; 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 (outside of normal wear and tear) or stolen. ROS for leased property shall be reported to the Contracting Officer through the Contracting Officer's 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 Computer Security Incident Response Team (CSIRT) at <a href="mailto:TSA-CSIRT@tsa.dhs.gov">TSA's Computer Security Computer Sec
  - (1) Non-sensitive personal property items with an original acquisition value less than \$500.00, unless the property was stolen, damaged or destroyed as a result of a natural fire or disaster.
  - (2) Sensitive property such as badges, credentials, TSO uniforms with patches or cloth badges, badge shields, and rank insignia (shoulder boards). For these items, the APO shall follow the reporting instructions published by the Office that issued the item in question. These items are governed and tracked by the issuing office, but will be subject to random audits by PMD.
- 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.
  - (3) Sensitive property that the PMO decides warrants a Board of Survey review, on a case-by-case basis.
  - (4) Any accountable property that sustains higher than normal loss rates.

## E. A Board of Survey shall:

- (1) Have one of the board members serve as Chairperson of the Board.
- (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 Inspection, 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: Management Official.
  - (2) All Accountable Personal Property: TSA PMO.
  - (3) A Board of Survey when the ROS is referred to them.

## I. Reporting Requirements:

- (1) Required Reports: APOs shall submit to TSA-Property@dhs.gov all completed ROS for Accountable Property within 10 days of event.
- (2) All ROS for sensitive property shall be reported to DHS by the PMO on the first business day of every month of any recorded loss of accountable property that occurred in the previous month.
- (3) The PMO shall submit an official TSA LDD annual report to the DHS Office of Chief Readiness Support Officer (OCRSO), Asset and Sustainability Management Programs no later than November 30.
- (4) At the end of the inventory cycle, PMD performs exhaustive research to try to locate missing assets that require resolution. All accountable assets not found as a result of the inventory campaign will remain on the Sunflower open report until close of the inventory campaign. At the close of the campaign, PMD prepares a final consolidated ROS, for not found assets, for each responsible program APO. The final program ROS will be used to

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adjust the Sunflower records. If the asset is capitalized, the program ROS will also be used to reconcile with the Financial Fixed assets.

**PROCEDURES:** Please reference the PPMM on PMD's <u>Personal Property</u>, <u>Policy and Compliance Branch iShare page</u>.

**8. APPROVAL AND EFFECTIVE DATE:** This policy is approved and effective the date of signature unless otherwise specified.

Signed	April 26, 2016
Pat A. Rose, Jr. Assistant Administrator Office of Finance and Administration Chief Financial and Administrative Officer	Date
EFFECTIVE	
Date	

Point of Contact: Property Management Division, TSA-Property@dhs.gov

TSA Employees

**APPROVAL** 

Distribution: