



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

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Audit of the Federal Bureau of Investigation's Controls over Weapons, Munitions, and Explosives

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Executive Summary

Audit of the Federal Bureau of Investigation's Controls over Weapons, Munitions, and Explosives

Objectives

The objectives of this audit were to evaluate: (1) the Federal Bureau of Investigation's (FBI) controls over weapons, munitions, and explosives; (2) the FBI's compliance with policies governing weapons, munitions, and explosives; and (3) the accuracy of the FBI's weapons, munitions, and explosives inventories.

The audit covers the FBI's weapons, munitions, and explosives inventories from fiscal year (FY) 2016 through November 2019. To accomplish our objectives, we interviewed FBI personnel; evaluated FBI policies governing weapons, munitions, and explosives; analyzed select data fields in the firearms inventory database; and reviewed firearm and explosives purchases. We also reviewed documentation related to firearms that were reported as lost or stolen during the scope of our audit to determine whether the FBI took appropriate action. Finally, we assessed compliance with FBI policy and conducted physical inventories at 15 FBI sites.

Results in Brief

We found that firearms in our sample were recorded in the FBI's inventory system and in the custody of the assigned Special Agent or stored in a secure area as required. However, we identified non-compliance issues related to the FBI's ammunition inventories. We also identified concerns related to tracking FBI ammunition, less lethal munitions, diversionary devices, and explosives; and firearms slated for disposal. Finally, we identified areas where FBI policies should be established or revised to improve the safeguarding of its ammunition, less lethal munitions, diversionary devices, and explosives.

Recommendations

Our report contains 13 recommendations to improve the FBI's controls over its weapons, ammunition, less lethal munitions, diversionary devices, and explosives. We requested a response to the draft report from the FBI, which can be found in Appendix 2. Our analysis of that response is included in Appendix 3.

Audit Results

As of August 2019, the FBI reported 57,812 firearms in its inventory. The FBI also maintains large quantities of ammunition for duty use, training, and periodic firearms qualifications. In addition, the FBI's Tactical Section and Special Weapons and Tactics teams maintain a variety of specialty weapons and less lethal munitions, and diversionary devices. The FBI also employs Special Agent Bomb Technicians who maintain inventories of explosives.

Controls over Firearms – We found that the FBI has strong physical controls over its unassigned firearms, and Special Agents are personally responsible for properly safeguarding assigned firearms. The FBI tracks its firearms using the Asset Management System (AMS), its automated property management system. During our physical inventory we were able to locate all firearms selected for our sample. However, we identified over 360 firearms without a designated property custodian in AMS, which is against FBI policy. We also selected a sample of firearms during our site visits and traced all but two of them back to AMS. The FBI could not explain the origins of these two firearms, or how they came to be in FBI custody.

We also determined that our sample of firearms purchased during a 2 month period were properly entered into AMS in a timely manner. Additionally, we evaluated the FBI's controls over firearms approved for disposal and identified deficiencies related to the accuracy of AMS records for destroyed firearms.

Lost and Stolen Firearms – We noted that between September 2016 and July 2019, 38 FBI Special Agents were disciplined for the loss or theft of 45 FBI-issued firearms. The FBI suspended 37 and dismissed 1 of the Special Agents held responsible for the loss or theft. Of the 45 lost or stolen firearms, 24 have been recovered, 1 of which was used in a crime. We also found that the FBI did not maintain complete documentation for 8 of the 45 lost or stolen firearms, including its make, model, or serial number; and a stolen firearm that was subsequently recovered more than 1 year ago was still marked as lost or stolen in AMS.



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Controls over Ammunition – The FBI maintained duty ammunition at 14 of the 15 sites we reviewed. We found that the FBI stored its ammunition in secured areas with access limited to FBI personnel. However, we identified weaknesses in the FBI's ammunition tracking and physical inventory policies that increase the risk of ammunition being lost or stolen without detection. As a result, we found that 6 of the FBI sites included in our audit were not tracking over 1.2 million rounds of ammunition, and another 7 sites were not adequately tracking ammunition.

Controls over Less Lethal Munitions and Diversionary Devices – The FBI maintained less lethal munitions and diversionary devices at 6 of the 15 sites we reviewed. Despite the lack of a policy establishing proper storage requirements, we found that the FBI stored its less lethal munitions and diversionary devices in a secure area with limited access. However, we identified weaknesses in the FBI's tracking and physical inventory policies for less lethal munitions and diversionary devices that increases the risk of their being lost or stolen without detection. As a result, we found that one FBI site was not tracking less lethal munitions and diversionary devices and that the remaining five sites we visited were not adequately tracking them.

Controls over Explosives – The FBI maintained explosives at 8 of the 15 sites we reviewed. We found that the FBI properly stored its explosives in accordance with FBI policy. However, we found two explosive magazines used to store FBI explosives were not owned by the FBI, but rather by state and local law enforcement agencies. As a result, the bomb technicians of these other agencies had emergency access to the FBI's explosives. Additionally, we identified weaknesses in the FBI's explosives tracking and physical inventory policies that increase the risk of explosives being lost or stolen without detection. As a result, we found that only two of the eight sites included in our audit were adequately tracking their explosives inventories.

Controls over Firearm and Ammunition Evidence – We determined that the FBI had strong physical controls over firearm and ammunition evidence and access to the Evidence Control Rooms was limited to designated personnel and required a keycard, combination, and alarm code. The FBI tracks its firearms and ammunition evidence using SENTINEL. During our physical inventory of firearm and ammunition evidence, we located all items selected for our sample and traced a sample of firearm and ammunition evidence back to SENTINEL.

However, we identified concerns related to firearm evidence sent to the Firearms/Toolmarks Unit (FTU) for destruction. Specifically, the current process of shipping firearm evidence to the FTU for destruction creates a risk that firearms could be lost in transit without detection; and firearms are being marked as disposed in SENTINEL before the firearms are actually destroyed.

**AUDIT OF THE FEDERAL BUREAU OF INVESTIGATION'S
CONTROLS OVER WEAPONS, MUNITIONS, AND EXPLOSIVES**

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AUDIT OF THE FEDERAL BUREAU OF INVESTIGATION'S CONTROLS OVER WEAPONS, MUNITIONS, AND EXPLOSIVES

INTRODUCTION

The Federal Bureau of Investigation (FBI) currently employs over 13,000 Special Agents located throughout the world, including over 400 domestic field offices and resident agencies, and 91 offices in 75 foreign countries. In support of its operations, the FBI maintains weapons, munitions, and explosives, including firearms, ammunition, less lethal munitions, diversionary devices, and explosives.

FBI Special Agents are required to carry a primary-duty handgun, and may be issued supplemental handguns, rifles, and shotguns. FBI employees also have the option of using authorized personally-owned firearms for duty use, and carrying oleoresin capsicum (OC) spray. As of August 2019, the FBI reported 57,812 firearms in its inventory, which are tracked through the FBI's automated property management database, the Asset Management System (AMS). The FBI also maintains large quantities of ammunition for duty use, training, and periodic firearms qualifications.

In addition, the FBI's Tactical Section and Special Weapons and Tactics (SWAT) teams maintain a variety of specialty weapons and munitions, including fully automatic machine guns; projectile launching devices and less lethal projectiles; smoke grenades; and Noise Flash Diversionary Devices, commonly referred to as flash bang grenades.

As a result of its criminal enforcement activity, FBI personnel may seize firearms and ammunition as evidence. Firearms and ammunition evidence must be tracked using SENTINEL, the FBI's central recordkeeping and case management system. All firearms and ammunition evidence must be stored in a secure Evidence Control Room. Additionally, FBI policy requires that firearms and ammunition evidence be stored separately, with the firearms packaging identifying the caliber, make, model, and serial number.

OIG Audit Approach

Our objectives were to evaluate: (1) the FBI's controls over weapons, munitions, and explosives; (2) the FBI's compliance with policies governing weapons, munitions, and explosives; and (3) the accuracy of the FBI's weapons, munitions, and explosives inventories. The scope of our audit generally covers the FBI's inventories of firearms, ammunition, less lethal munitions, diversionary devices, and explosives, including firearms and ammunition seized as evidence, firearm and explosives purchases, and FBI-issued firearms reported lost or stolen, from September 2015 through November 2019.

To accomplish our objectives, we interviewed FBI personnel, including officials from the Finance, Inspection, Training, and Laboratory Divisions, as well as the Critical Incident Response Group. In addition, we evaluated the FBI's policies governing weapons, munitions, and explosives, and reviewed documentation related to firearms and explosives purchases to ensure that acquisitions were

properly recorded.¹ We also reviewed documentation related to firearms that were reported as lost or stolen during the scope of our audit to determine whether the FBI took appropriate action. Finally, we conducted site work at 15 FBI sites, as shown in Table 1.²

Table 1
FBI Offices Selected for Audit

FBI Office	FBI Firearms	Firearms Evidence
Denver Division		
Denver Field Office	374	400
Loveland Resident Agency	27	0
Chicago Division		
Chicago Field Office	1,079	1,439
Milwaukee Division		
Milwaukee Field Office	289	163
Madison Resident Agency	32	0
Sacramento Division		
Sacramento Field Office	333	584
Stockton Resident Agency	40	0
Boston Division		
Boston Field Office	451	351
Providence Resident Agency	75	0
New Haven Division		
New Haven Field Office	227	311
Training Division		
Firearms Training Unit	1,322	
Defensive Systems Unit	9,212	
Laboratory Division		
Firearms/Toolmarks Unit	7,863	
Critical Incident Response Group		
Tactical Section	1,847	
Hazardous Devices School	31	

Source: The FBI's AMS; the FBI's SENTINEL

The purpose of our site work was to assess the FBI's compliance with policies regarding its weapons, munitions, and explosives, as well as the effectiveness of those policies. As applicable, we also conducted a physical inventory of a sample of firearms, ammunition, less lethal munitions, diversionary devices, and explosives at the sites we visited. In addition, we assessed the FBI's compliance with policies regarding firearms and ammunition seized as evidence. Finally, we conducted a physical inventory of a sample of firearm and ammunition evidence. Appendix 1 contains a more detailed description of our audit objectives, scope, and methodology.

¹ See Appendix 1 for a list of FBI policies we reviewed.

² We selected a broad range of FBI offices and functions for our site work, including large division offices; smaller Resident Agencies; the FBI's Training Academy; the Critical Incident Response Group's Tactical Section, and the Hazardous Devices School.

AUDIT RESULTS

We found that the FBI has strong physical controls over its unassigned firearms and that Special Agents are personally responsible for properly safeguarding assigned firearms. However, we identified over 360 firearm inventory records that did not include a designated property custodian as required by FBI policy. We also identified weaknesses in the FBI's controls over tracking its ammunition, less lethal munitions, diversionary devices, and explosives, which, in our judgement, create a risk that these sensitive items may be lost, misplaced, or stolen without detection. Specifically, we found that the FBI's ammunition, less lethal munitions, diversionary devices, and explosives tracking and inventory requirements were either not specific, or non-existent; as a result, at 14 of the sites included in our audit, these items were not tracked or were not adequately tracked. In addition, at two sites the FBI is storing its explosives in a magazine owned by state and local law enforcement agencies who have emergency access. Finally, we identified concerns with the FBI's firearm evidence disposal process, which increases the risk that firearms sent for destruction may be lost during shipping.

Controls over Firearms

The FBI tracks its firearms inventory using an automated property management database known as AMS. The FBI also conducts an annual physical inventory of all of its firearms. During our site visits, we performed a physical inventory and were able to locate all of the weapons selected for our sample. We were also able to trace another sample of weapons back to AMS, although we noted some data errors in AMS. Additionally, we identified 369 firearms for which the AMS records did not include a designated property custodian as required by FBI policy. Finally, from September 2015 through July 2019, the FBI reported 45 of its firearms as lost or stolen.

Physical Security of Firearms

We found that the FBI had strong physical controls over unassigned firearms. Special Agents are personally responsible for properly safeguarding their assigned firearms at all times. Additionally, FBI offices have designated staff, Primary Firearms Instructors, who are responsible for all firearms that are not issued to an employee. When assigned firearms are not in the personal custody of Special Agents they must be placed in a secure, locked storage area to prevent unauthorized handling. At the 15 FBI sites we visited, we found that all of the firearms in our sample were either in the custody of the assigned Special Agent or stored in a secure area.

Accuracy of the FBI's Asset Management System

As of August 2019, the FBI reported 57,812 firearms in its inventory. We selected a sample of 422 firearms from AMS to ensure that they were physically accounted for and accurately tracked in the system. We selected an additional

185 firearms while on site to ensure that the field sites' AMS records were complete and accurate. During our physical inventory, we located all 422 firearms in our sample and traced 183 of the additional 185 firearms back to AMS. We were unable to trace two firearms back to AMS, both of which were located in a gun safe in the Madison Resident Agency. The Firearms Instructor in Madison explained that the origins of the firearms were unknown. As a result, the FBI needs to determine the rightful owner of these firearms and take appropriate action. Therefore, we recommend that the FBI ensure all firearms in its custody are properly entered into the appropriate property management system. All FBI-issued firearms should be entered into AMS and all firearm evidence should be entered into SENTINEL.

During our physical inventory, we also identified data errors in AMS for 20 of the firearms included in our sample, related to the make, model, serial number, location, or assigned user. An FBI official explained that the errors may be attributed to invalid or corrupted data fields that occurred during its migration to AMS from the FBI's prior property management system. While these inaccuracies did not significantly impact our ability to locate the firearms and the FBI either corrected or submitted a service request to correct the errors, it is important that the FBI maintains current and accurate information in AMS.

Additionally, we identified 32 AMS records for the firearms in our sample that did not include an assigned property custodian. The FBI's Personal Property Management Policy Guide requires all accountable assets in AMS be assigned to a property custodian. This designation is particularly important because property custodians are responsible for the stewardship of all assets assigned to them. As a result, we expanded our analysis concerning the assignment of property custodians to include all 23,201 firearms listed in AMS for the 15 sites included in our audit. Based on our expanded analysis, we found that a total of 369 firearms did not have an assigned property custodian in AMS. Without a designated property custodian, the FBI cannot be assured that all of its firearms are properly safeguarded. Therefore, we recommend that the FBI ensure all firearms in its inventory have a designated property custodian, in accordance with policy.

Firearm Purchases

The FBI's Defensive Systems Unit (DSU) is responsible for purchasing, receiving, and test-firing all new firearms. According to a DSU official, once DSU receives a shipment of new firearms, the contents of the shipping container are inventoried against the receiving documents. Once all firearms are accounted for, the receiving documents are signed and dated, approved by a DSU program manager, and forwarded to an Inventory Management Specialist. The Inventory Management Specialist then submits a service request in AMS to have the firearm entered into the inventory, including all pertinent information such as the firearm manufacturer, model, and serial number. Once the record is complete, the firearm becomes operational and can be issued to a user. We reviewed a sample of 226 purchased firearms that were received in July and August 2019. Based on our review, we did not identify any concerns related to the FBI's firearm purchases. Additionally, we found that all 226 firearms were correctly entered into AMS.

Firearm Disposal

We identified concerns related to the record keeping of disposed FBI-issued firearms. The FBI's DSU is responsible for destruction of FBI-issued firearms. A DSU official explained that only the DSU Chief, or its designee, can determine whether FBI-issued firearms are eligible for destruction, after which the Asset Management Unit provides the authority for DSU to destroy weapons. For each firearm approved by DSU for destruction, DSU prepares a Form FD-519, Requirements and Certification for Cannibalization and Destruction of Equipment; photographs the firearm's serial number; and places the firearm into a cardboard box. Once the box contains 50 firearms, it is inventoried and sealed, and the list of contents is attached to the outside of the box. The box is then stored in a secure vault and wrapped with other sealed disposal boxes prior to being escorted to the destruction facility. The disposal process is witnessed by two FBI employees from two vantage points and the destruction is certified on the Form FD-519. An Inventory Management Specialist uses the serial number photos to verify the disposal status of firearm records in AMS and submits a service request in AMS that must be approved by the Asset Management Unit before the inventory record is updated. We examined the physical security of the disposal boxes and found that they were properly stored in a secure area with access limited to designated officials.

However, we found two destroyed FBI prop guns that were still listed in the FBI's active inventory. The property numbers for both prop guns were listed on the inventory sheet with serial numbers of 48 other firearms awaiting disposal. According to a DSU official, prop guns are non-functioning items used for training. They are not actual firearms and do not have serial numbers. However, they are assigned an FBI property number and entered into AMS. The DSU official explained that since these prop guns did not have serial numbers, the disposal information was not recorded in AMS. Because these were not actual firearms, we are not making a recommendation related to this issue.

Lost and Stolen Firearms

Between September 2015 and July 2019, 38 FBI Special Agents reported 45 assigned FBI firearms as lost or stolen. We noted that 24 of the 45 lost or stolen firearms have been recovered, 1 of which was used in the commission of an attempted robbery while outside of the FBI's custody.

The details related to the 45 lost and stolen firearms included in our analysis are shown in Table 2.

Table 2
Lost and Stolen FBI Firearms

Type of Loss	Type of Firearm	Firearm Recovered	Involved in a Crime	Synopsis	Disciplinary Action
Stolen	Springfield pistol	No	Unknown	Stolen from government vehicle	3-day suspension
Stolen	Colt carbine	No	Unknown		
Lost	Glock pistol	No	Unknown	Inadequately safeguarded	3-day suspension
Stolen	Springfield pistol	No	Unknown	Inadequately safeguarded	5-day suspension
Stolen	Glock pistol	No	Unknown		
Stolen	Glock pistol	No	Unknown	Stolen from rental car	3-day suspension
Stolen	H&K submachine gun	No	Unknown	Stolen from government vehicle	3-day suspension
Stolen	Remington shotgun	No	Unknown		
Lost	Unknown	Yes	Unknown	Left in public restroom	3-day suspension
Lost	Glock pistol	Yes	Unknown	Left on truck bumper	3-day suspension
Stolen	Glock pistol	No	Unknown	Stolen from government vehicle	3-day suspension
Lost	Glock training pistol	Yes	No	Failed to record issuance of training firearm in AMS	3-day suspension
Stolen	Rock River carbine	No	Unknown	Stolen from government vehicle	5-day suspension
Stolen	Glock pistol	No	Unknown		
Stolen	Rock River carbine	Yes	Yes, 1 of 2	Stolen from government vehicle	3-day suspension
Stolen	H&K submachine gun	Yes			
Stolen	Glock pistol	No	Unknown	Stolen from government vehicle	7-day suspension
Lost	Glock pistol	Yes	Unknown	Left in public area	3-day suspension
Lost	Glock pistol	Yes	Unknown	Misplaced in residence	3-day suspension
Lost	Unknown	Yes	Unknown	Left in public restroom	3-day suspension
Stolen	Glock pistol	No	Unknown	Stolen from residence	45-day suspension
Stolen	H&K submachine gun	No	Unknown	Inadequately safeguarded	3-day suspension
Lost	Remington shotgun	Yes	Unknown	Left on trunk of car	5-day suspension
Lost	Handgun	Yes	Unknown	Inadequately safeguarded	3-day suspension
Lost	Unknown	Yes	Unknown	Left in hotel room	3-day suspension
Lost	Glock pistol	Yes	Unknown	Misplaced in residence	3-day suspension
Lost	Glock training pistol	No	Unknown	Misplaced by Special Agent	3-day suspension
Lost	Glock pistol	Yes	Unknown	Left in hotel restroom	3-day suspension

Lost	Sig Sauer training pistol	No	Unknown	Assigned Special Agent could not account for firearm during inventory	3-day suspension
Lost	Glock pistol	No	Unknown	Lost during training exercise	3-day suspension
Stolen	Glock pistol	Yes	Unknown	Stolen by daughter	3-day suspension
Lost	Springfield pistol	Yes	Unknown	Misplaced in residence	5-day suspension
Stolen	Glock pistol	No	Unknown	Stolen from personal vehicle	3-day suspension
Lost	Glock pistol	Yes	Unknown	Misplaced at prison facility	7-day suspension
Stolen	Colt carbine	Yes	Unknown	Stolen from government vehicle	3-day suspension
Stolen	Glock pistol	Yes	Unknown	Stolen from hotel room	Dismissal
Stolen	Unknown	Yes	Unknown	Stolen from airport	5-day suspension
Stolen	Glock pistol	Yes	Unknown	Stolen from vehicle	3-day suspension
Stolen	Glock pistol	No	Unknown	Stolen from vehicle	60-day suspension
Stolen	Glock pistol	No	Unknown		
Stolen	Colt carbine	No	Unknown		
Stolen	Glock pistol	Yes	Unknown	Inadequately safeguarded	3-day suspension
Stolen	H&K submachine gun	No	Unknown	Inadequately safeguarded	3-day suspension
Stolen	H&K submachine gun	Yes	Unknown	Stolen from government vehicle	3-day suspension
Lost	Glock pistol	Yes	Unknown	Left in restaurant bathroom	3-day suspension

Source: The FBI's Office of Professional Responsibility

We reviewed the FBI's records to determine whether it took disciplinary action in response to these lost or stolen firearms incidents. We found that in 37 of the 38 incidents, the Special Agent responsible for the loss or theft was suspended between 3 and 60 days; the most common suspension was 3 days. For the remaining incident, the circumstances of the theft were serious enough to warrant dismissal of the Special Agent responsible.

To ensure the accuracy of the FBI's tracking information, we reviewed AMS records for the 21 lost or stolen firearms that remain missing to confirm that none of them appear in the FBI's active inventory record. Similarly, we attempted to confirm that the inventory records for all 24 recovered firearms have been appropriately updated in AMS. However, we found that the FBI did not maintain complete documentation for 8 of the 45 lost or stolen firearms, including its make, model, or serial number. As a result, we were unable to determine if the AMS records were accurate. When a firearm is lost or stolen, FBI policy requires Primary Firearm Instructors to prepare an Electronic Communication that includes all of the details about the incident, including the serial number of the weapon. The Primary Firearm Instructor must also prepare a Form FD-500, Report of Lost or Stolen

Property, that includes the serial number and description of the firearms. The fact that the FBI was unable to provide this information indicates that the policy is not being properly followed. As a result, we recommend that the FBI ensures that complete documentation of lost and stolen FBI firearms is maintained, including all pertinent information such as the firearm make, model, and serial number. Additionally, a stolen firearm that was subsequently recovered more than 1 year ago was still marked as lost or stolen in AMS. In our judgment, AMS should always maintain current and accurate inventory data for all firearms. Therefore, we recommend that the FBI ensure that the status of all lost or stolen firearms that are subsequently recovered is accurately reflected in AMS.

Finally, we assessed the rate of loss of FBI firearms over a 47-month period from September 2015 through July 2019 to determine how it compared to the loss rate identified in our prior 2002 and 2007 OIG audits.³ We found that the FBI experienced 0.96 losses or thefts per month over the 47-month period from 2015 to 2019, which is a significant decrease over the monthly loss rates of 7.6 and 3.2 losses or thefts per month identified in the 2002 and 2007 OIG audits, respectively. While the FBI has substantially reduced the rate of lost and stolen firearms since our prior audits, it must continuously work toward reducing this rate.

Controls over Ammunition

The FBI maintained duty ammunition at 14 of the 15 sites we reviewed. We found that the FBI had strong physical controls to ensure that ammunition is stored in secure locations at all 14 sites we visited. We also determined that 6 of 14 sites were not tracking over 1.2 million rounds of ammunition. Additionally, while the eight remaining sites had a method for tracking ammunition, only one site was adequately tracking ammunition. In our judgment, the issues we identified related to tracking ammunition primarily resulted from the FBI's inadequate ammunition tracking policy. We also identified areas where the FBI ammunition policy could be improved.

Physical Security of Ammunition

FBI policy requires that ammunition be stored in a secure area with strictly controlled access. At all 14 sites that had ammunition inventories, we found that the ammunition was kept in a secure storage area. However, at 1 of the 14 sites a local task force officer had access to the FBI ammunition storage area. Subsequent to our site visit, this office moved its ammunition to a new location and now limits access to only designated FBI personnel. As a result, we are not making a recommendation related to this issue.

³ Audit Report 02-27, *The Federal Bureau of Investigation's Control over Weapons and Laptop Computers*, August 2002; and Audit Report 07-18, *The Federal Bureau of Investigation's Control over Weapons and Laptop Computers Follow-Up Audit*, February 2007.

Ammunition Tracking

Strong controls over ammunition require an inventory management system that maintains accurate, current, and historical data—to include increases and decreases in inventory and the reason for the changes in quantity over time. While FBI policy states that Primary Firearms Instructors should account for all ammunition usage, the policy does not specify how ammunition should be tracked. We believe that this is a control weakness that increases the risk of ammunition being lost, misplaced, or stolen without detection. In our judgment, handwritten logs should be maintained in the ammunition storage area to facilitate consistent use and avoid the necessity for computer access on-site. Handwritten logs also ensure that the tracking method includes an audit trail of recorded transactions, which is a control that can be circumvented using an electronic inventory log that allows the user to overwrite the data. Therefore, we recommend that the FBI amend its policy for tracking ammunition to require that all rounds of each type of ammunition be tracked using handwritten logs that detail the date, caliber, quantity in or out, purpose of the ammunition transaction, and remaining balance; and that the FBI require all ammunition tracking logs to be retained for at least 3 years.

We found that 6 of the 14 FBI sites included in our audit were not tracking over 1.2 million rounds of ammunition. The remaining eight sites were using various methods to track ammunition, including logging ammunition transactions or periodically updating the balance of ammunition on hand. However, the Firearms Training Unit was the only site that adequately tracked all ammunition transactions in and out of the storage area and maintained a running balance of ammunition on hand, which we view as a best practice that the FBI should implement at all offices. Table 3 outlines ammunition tracking methods and the related deficiencies we identified at the 14 sites included in our analysis.

Table 3
Ammunition Tracking Deficiencies

Site	Tracking Methods	Tracking Deficiencies
Denver Field Office	Handwritten log with transactions and running balances	Office only recently started tracking ammunition; not all ammunition was being tracked
Loveland Resident Agency	None	Ammunition was not tracked
Boston Field Office	Electronic log showing inventory totals	Transactions were not being recorded, no historical data, and ending balances were not updated regularly
Providence Resident Agency	None	Ammunition was not tracked
Chicago Field Office	Handwritten log with transactions and electronic log with running balances	Two separate tracking methods that were not reconciled regularly
Milwaukee Field Office	Electronic log showing inventory totals	Transactions were not being recorded
Madison Resident Agency	Handwritten log with transactions and electronic log with running balances	Office only recently started tracking ammunition; two separate tracking methods

Sacramento Field Office	None	Ammunition was not tracked
Stockton Resident Agency	None	Ammunition was not tracked
New Haven Field Office	None	Ammunition was not tracked
CIRG – Tactical Section	Handwritten log with transactions and electronic log with running balances	No historical running balances
Defensive Systems Unit	None	Ammunition was not tracked
Hazardous Devices School	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
Firearms Training Unit	Handwritten log with transactions and electronic log with running balances	None

Source: The FBI and OIG

Results of the Ammunition Inventory

In order to assess the accuracy of the FBI’s ammunition inventories, we conducted a physical inventory of ammunition at the 14 sites we visited that maintained ammunition. As stated previously, 6 of the 14 sites were not tracking ammunition; as a result, we could not assess the accuracy of their ammunition inventories. For the remaining eight sites that had some type of ammunition tracking system, we identified discrepancies between the quantities of ammunition on hand and the recorded inventory balance at six sites. In total for the six sites, the balances recorded in the ammunition inventory records were understated by over 174,000 rounds, meaning that the FBI had more ammunition on hand than what was documented. In our judgment, the discrepancies we identified are a direct result of the FBI’s insufficient ammunition tracking and inventory policies.

We also found that the FBI’s policy for conducting periodic physical inventories of its ammunition needs improvement. While the FBI requires its offices to conduct annual physical inventories of its ammunition, this function is primarily performed to allow the Finance Division to account for all FBI assets. In our judgment, a physical ammunition inventory should also ensure that the running balances on ammunition tracking logs are accurate by reconciling the ammunition on hand to the logged inventory balance. However, this is not required by current FBI policy. When implemented effectively, this physical inventory practice should detect if ammunition goes missing. We observed this form of physical ammunition inventory being conducted at the FBI’s Firearms Training Unit and its Tactical Section, which we view as a best practice that the FBI should implement agency-wide. Therefore, we recommend that the FBI revise its current policy to require its offices to conduct a complete inventory of all ammunition on hand on an annual basis to ensure all recorded ammunition inventory balances are accurate, and to retain those records for at least 3 years.

Controls over Less Lethal Munitions and Diversionary Devices

The FBI maintained less lethal munitions and diversionary devices, including pepper spray, handheld and projectile chemical agents, breaching munitions, smoke grenades, and flash bang grenades, at 6 of the 15 sites we reviewed. We

found that the FBI has strong physical controls over its less lethal munitions and diversionary devices at these six sites. However, we identified deficiencies related to the FBI's tracking of its less lethal munitions and diversionary devices. We also found that the FBI was not conducting annual physical inventories of its less lethal munitions and diversionary devices.

Physical Security of Less Lethal Munitions and Diversionary Devices

We found that the FBI has strong physical controls over its less lethal munitions and diversionary devices. While the FBI does not have policy outlining storage requirements for less lethal munitions and diversionary devices, we observed that less lethal munitions and diversionary devices at all six sites were kept in a secure storage area. We also found that all six sites limited access to the secure storage areas to designated personnel. However, without established storage requirements, there is a risk that less lethal munitions and diversionary devices may not be properly safeguarded from loss or theft at all FBI locations. In our judgment, the FBI should formalize its current storage practices in policy. Therefore, we recommend that the FBI establish policy requiring that less lethal munitions and diversionary devices must be stored in a secure area, with access limited to designated personnel.

Tracking Less Lethal Munitions and Diversionary Devices

Strong controls over less lethal munitions and diversionary devices require an inventory management system that maintains accurate, current, and historical data—to include increases and decreases in inventory and the reason for the changes in quantity over time. However, the FBI's policy merely suggests that Primary Firearms Instructors create an inventory system for all expendable commodities, and is largely silent with regard to tracking less lethal munitions and diversionary devices. In our judgment, this is a control weakness that increases the risk of less lethal munitions and diversionary devices being lost, misplaced, or stolen without detection. Therefore, we recommend that the FBI establish policy for tracking less lethal munitions and diversionary devices that requires all quantities of each type of less lethal munition and diversionary device be tracked using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and that the FBI require all less lethal munition and diversionary device tracking logs to be retained for at least 3 years.

We found that one of the six FBI sites included in our audit was not tracking less lethal munitions and diversionary devices. The remaining five sites were using various methods to track these items, only some of which adequately logged transactions or kept a running balance of less lethal munitions and diversionary devices on hand. While none of these five sites were adequately tracking all less lethal munitions and diversionary devices, the Denver and Chicago Field Offices tracked usage of flash bang grenades and maintained a record showing which Special Agents had these munitions in their custody, which we view as a best practice that the FBI should implement at all offices. Table 4 outlines the various methods used by the FBI offices we visited to track less lethal munitions and

diversionary devices, as well as the deficiencies we found with those tracking methods.

Table 4

Less Lethal Munition and Diversionary Device Tracking Deficiencies

Site	Tracking Methods	Tracking Deficiencies
Denver Field Office	Electronic log showing inventory totals	Not all transactions were being recorded (only flash bang grenades)
Chicago Field Office	Electronic log showing inventory totals	Not all transactions were being recorded (only flash bang grenades)
Milwaukee Field Office	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
Madison Resident Agency	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
New Haven Field Office	None	Less lethal munitions were not tracked
CIRG – Tactical Section	Electronic log showing inventory totals	Transactions were not being recorded and no historical data

Source: The FBI and OIG

Results of the Less Lethal Munitions and Diversionary Devices Inventory

We conducted a physical inventory of less lethal munitions and diversionary devices at the six sites that maintained these inventories. We identified discrepancies between the quantities of less lethal munitions and diversionary devices on hand and the recorded inventory balance at three of the five sites that tracked these items. In total, these sites overstated their recorded inventories of less lethal munitions and diversionary devices on hand by 87 items. In our judgment, the discrepancies we identified are primarily a result of the FBI’s deficient less lethal munition and diversionary device tracking and inventory policies.

In addition, we found that the FBI does not require periodic physical inventories of its less lethal munitions and diversionary devices. In our judgment, a physical inventory of all less lethal munitions and diversionary devices should be conducted regularly to ensure all items are properly accounted for on the inventory tracking documents. Consequently, we recommend that the FBI require its offices to conduct a complete physical inventory of all less lethal munitions and diversionary devices on an annual basis and retain those records for at least 3 years.

Controls over Explosives

The FBI maintained explosives at 8 of the 15 sites we reviewed. We found that the FBI has strong physical controls over its explosives at all eight locations we visited. However, we identified deficiencies related to the FBI’s tracking of its explosives. We also found that the FBI was not conducting annual physical inventories of explosives.

Physical Security of Explosives

We found that the FBI has strong physical controls over its explosives. At each of the eight sites we visited with an explosives inventory, explosives were stored in a secure area with access limited to designated bomb technicians. However, we noted that two of the explosive magazines used to store FBI explosives were not owned by the FBI, but rather by state or local law enforcement agencies. As a result, the bomb technicians of these state and local law enforcement agencies had access to the FBI's explosives inventories. It should be noted that these agencies did not store explosives in the same magazine as the FBI, and the access they were granted was for emergency purposes only. According to an FBI Special Agent Bomb Technician (SABT), it is cost-prohibitive for the FBI to maintain its own explosive magazines in field offices with a small number of SABTs, which necessitates these types of explosives storage arrangements with other law enforcement agencies. In our judgment, the risk posed by granting non-FBI employees access to the FBI's explosives can be mitigated by implementing our recommendations related to tracking explosives and conducting periodic physical explosives inventories, which are discussed in the following sections. Consequently, we are not making a recommendation related to this issue.

Tracking Explosives

Strong controls over explosives require an inventory management system that maintains accurate, current, and historical data—to include increases and decreases in inventory and the reason for the changes in quantity over time. While FBI policy requires SABTs to maintain strict accountability and security for all explosives, the policy does not specify how SABTs should account for and track their explosives inventories. As a result, various methods were used to track explosives at the eight sites we visited that maintained explosives. We found that only two sites, the FBI's Hazardous Devices School and the Sacramento Field Office, were effectively tracking explosive materials. Both sites maintained hand-written logs for each type of explosive material stored in its magazines that tracked all movement of explosives in and out of the storage area, and the remaining balance on hand. In our judgment, this is a best practice that the FBI should implement agency-wide, to ensure explosives are not lost or stolen without detection. Therefore, we recommend that the FBI amend its policy requiring all quantities of each type of explosive material be tracked by its SABTs using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and that the FBI retain all explosives tracking records for at least 3 years. Table 5 outlines the various methods used by the FBI offices we visited to track explosives and the deficiencies we found with those tracking methods.

Table 5
Explosives Tracking Deficiencies

Site	Tracking Methods	Tracking Deficiencies
Boston Field Office	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
Denver Field Office	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
Chicago Field Office	Handwritten log showing inventory totals and changes over time	The purpose of each change in the inventory totals was not documented
Milwaukee Field Office	Electronic log showing inventory totals with handwritten updates	The purpose of each change in the inventory totals was not documented
New Haven Field Office	Electronic log showing inventory totals	Transactions were not being recorded and no historical data
Sacramento Field Office	Handwritten log with transactions and running balance	None
CIRG – Tactical Section	Electronic log showing inventory totals	Not all transactions were being recorded
Hazardous Devices School	Handwritten log with transactions and running balance	None

Source: The FBI and OIG

Results of the Explosives Inventory

We conducted a physical inventory of a sample of explosives at seven of the eight sites with an inventory of such items, comparing the inventory log balance to the quantity on hand.⁴ We identified discrepancies between the quantities of explosives on hand and the recorded inventory balance at three of the seven sites. In total, these sites had 32 fewer explosives on hand than the balance recorded on the inventory list. These offices could not explain the cause of the discrepancies because they were not maintaining a record of inventory transactions. As a result, we could not confirm whether these items were expended, or were lost or stolen without detection. In our judgment, the discrepancies we identified are a result of the FBI's deficient explosives tracking and inventory policies.

Additionally, we found that the FBI does not require periodic physical inventories of its explosive materials. In our judgment, a physical inventory of all explosives should be conducted regularly to ensure all items are properly accounted for on the inventory tracking documents. Consequently, we recommend that the FBI require its offices to conduct a complete physical inventory of all explosives on an annual basis and retain those records for at least 3 years.

⁴ Due to inclement weather and the location of the explosives magazine, we were unable to complete a physical inventory of explosives at the Chicago Field Office.

Explosives Purchases

The FBI's Hazardous Devices School is responsible for training and certifying public safety bomb technicians, and as such, it purchases large quantities of explosives. According to a Hazardous Devices School official, once it receives a shipment of explosives, the contents of the shipping container are inventoried against the receiving documents and the explosives are added to the inventory. The additions are then entered into the handwritten logs and the inventory balances are updated. We reviewed a sample of 13 purchases from the Hazardous Devices School's explosives inventory that were received between December 2018 and March 2019. Based on our review, we did not identify any concerns related to the Hazardous Devices School's explosives purchases.

Controls over Firearm and Ammunition Evidence

The FBI maintained firearms and ammunition seized as evidence at 6 of the 15 sites included in our audit. We found that the FBI has strong physical controls over its firearms and ammunition evidence. During our physical inventory of firearms and ammunition evidence, we were able to locate all items in our sample and trace a sample of items back to SENTINEL, the FBI's evidence tracking system. However, we identified concerns related to the disposal of firearm evidence.

Physical Security of Firearm and Ammunition Evidence

We determined that the FBI has strong physical controls over firearm and ammunition evidence. The FBI stores its firearm and ammunition evidence in a storage configuration, known as an Evidence Control Room (ECR), which is similar at each location. FBI policy requires each ECR to be equipped with an electronic keypad, combination lock, and an alarm. Access to the ECR must be limited to designated Evidence Control Technicians, and entries must be recorded on an access log. At all six ECRs we visited, we found that access to the ECR requires a keycard, the combination numbers, and an alarm deactivation code. We also found that access was limited to designated Evidence Control Technicians and all six sites maintained access logs for recording entries into the ECR. In addition, each site had ways to temporarily store evidence outside of the ECR when the evidence custodian was unavailable, including lockers or a one-way chute located in the wall of the ECR.

Accuracy of the FBI's Firearm and Ammunition Evidence Inventory

The FBI provided us with inventory lists from SENTINEL of firearm and ammunition evidence stored in the ECRs at the six sites we visited. In accordance with FBI policy, the chain-of-custody information and a complete description, including make, model, caliber, and serial number, for all firearm and ammunition evidence must be entered into SENTINEL.

To verify the accuracy of the FBI's firearm and ammunition evidence inventory, we selected an evidence sample consisting of 143 items of firearms and ammunition evidence from the inventory lists provided by the FBI to ensure they

were properly accounted for in SENTINEL. In addition, we selected 27 items of firearm and ammunition evidence located in the FBI's ECRs and attempted to trace those items back to the inventory lists to ensure that the evidence inventory records were complete and accurate. During our physical inventory, we located all 143 items of firearm and ammunition evidence in our sample and we traced all 27 items of firearms and ammunition evidence back to the inventory lists.

Disposal of Firearm Evidence

We evaluated controls over the FBI's firearm evidence disposal process and identified concerns related to firearm evidence sent to the Firearms/Toolmarks Unit (FTU) for destruction. The FBI's evidence management policy states that the FTU is responsible for the destruction of all abandoned firearm evidence. This policy also requires the firearm evidence disposal date in SENTINEL to reflect the date that the firearm permanently leaves the ECR. Accordingly, Evidence Control Technicians in the field ship firearms evidence to the FTU for destruction and mark the item as destroyed in SENTINEL using the date it was shipped, rather than the date it was destroyed. We recommend that the FBI amend its policy to require Evidence Control Technicians to obtain and upload a notification of destruction from the FTU prior to marking the firearm evidence as disposed in SENTINEL, and require the firearm evidence disposal date in SENTINEL to reflect the date the firearm is destroyed.

According to an FTU official, once the FTU receives abandoned firearms evidence slated for disposal, including legal documentation supporting the disposal, the firearm is entered into its electronic tracking system and assigned a barcode. The firearm is stored in a large box in the FTU's secure destruction room. Once that box is filled, two FTU employees scan the barcode of each firearm and place the firearm in another container, which is sealed with metal security straps. The FTU then sends an electronic request to the FBI's Asset Management Unit requesting approval for the destruction of the firearms and includes a spreadsheet listing every firearm to be destroyed. The approval for destruction request identifies the destruction date and who will transport the firearms, and states that the FTU will maintain control of all firearms until they are melted down and destroyed. Upon approval, the sealed containers are escorted to the destruction facility and the destruction is witnessed by the FTU official assigned to escort the sealed containers to the destruction facility. Once the firearms are destroyed, the FTU sends a notification to the Asset Management Unit.

We determined that the FTU uses a separate inventory system, not SENTINEL, to track the firearm evidence it receives. As a result, the FTU is unaware of when firearms evidence is shipped to the FTU for disposal. This is particularly concerning, because we found two of the ECRs we visited were not confirming the delivery of firearm evidence shipped to the FTU for destruction, which creates a temporary gap in the chain of custody when firearms marked as destroyed could be lost or stolen without detection, particularly during shipping. At the remaining four ECRs we visited, the Evidence Control Technicians uploaded proof of delivery into SENTINEL when firearm evidence was shipped to the FTU for

destruction, which we view as a best practice that the FBI should implement agency-wide. Therefore, we recommend that the FBI require proof of delivery to be maintained in SENTINEL for firearms evidence shipped to the FTU for disposal.

CONCLUSION AND RECOMMENDATIONS

The FBI has strong physical controls over its weapons, munitions, and explosives. However, the FBI needs to ensure all firearms have a designated property custodian, and should improve its controls over tracking and accountability of its ammunition, less lethal munitions, diversionary devices, and explosives inventories. The FBI also needs to improve controls over firearm evidence slated for destruction. Without sufficient controls over its sensitive property, the FBI cannot be assured that its inventories of weapons, munitions, and explosives are adequately safeguarded. Most significantly, the deficiencies we identified increase the risk that the FBI's weapons, munitions, and explosives can be lost, misplaced, or stolen without detection. As a result, we make 13 recommendations to improve the FBI's controls over weapons, munitions, and explosives.

We recommend that the FBI:

1. Ensure all firearms in its custody are properly entered into the appropriate property management system.
2. Ensure all firearms in its inventory have a designated property custodian, in accordance with policy.
3. Ensures that complete documentation of lost and stolen FBI firearms is maintained, including all pertinent information such as the firearm make, model, and serial number.
4. Ensure that the status of all lost or stolen firearms that are subsequently recovered is accurately reflected in AMS.
5. Amend its policy for tracking ammunition to require that all rounds of each type of ammunition be tracked using handwritten logs that detail the date, caliber, quantity in or out, purpose of the ammunition transaction, and remaining balance; and require all ammunition tracking logs to be retained for at least 3 years.
6. Revise its current policy to require its offices to conduct a complete inventory of all ammunition on hand on an annual basis to ensure all recorded ammunition inventory balances are accurate, and to retain those records for at least 3 years.
7. Establish policy requiring that less lethal munitions and diversionary devices must be stored in a secure area, with access limited to designated personnel.
8. Establish policy for tracking less lethal munitions and diversionary devices that requires all quantities of each type of less lethal munition and diversionary device to be tracked using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and require all less lethal munition and diversionary device tracking logs to be retained for at least 3 years.

9. Require its offices to conduct a complete physical inventory of all less lethal munitions and diversionary devices on an annual basis and retain those records for at least 3 years.
10. Amend its policy requiring all quantities of each type of explosive material be tracked by its SABTs using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and retain all explosives tracking records for at least 3 years.
11. Require its offices to conduct a complete physical inventory of all explosives on an annual basis and retain those records for at least 3 years.
12. Amend its policy to require Evidence Control Technicians to obtain and upload a notification of destruction from the FTU prior to marking the firearm evidence as disposed in SENTINEL, and require the firearm evidence disposal date in SENTINEL to reflect the date the firearm is destroyed.
13. Require proof of delivery to be maintained in SENTINEL for firearms evidence shipped to the FTU for disposal.

OBJECTIVES, SCOPE, AND METHODOLOGY

Objectives

The objectives of the audit were to evaluate: (1) the FBI's controls over weapons, munitions, and explosives; (2) the FBI's compliance with policies governing weapons, munitions, and explosives; and (3) the accuracy of the FBI's weapons, munitions, and explosives inventories.

Scope and Methodology

Our audit covers the FBI's inventories of firearms, ammunition, less lethal munitions, diversionary devices, and explosives; and included firearms and ammunition seized as evidence, firearm purchases, and FBI-issued firearms reported lost or stolen from September 2015 through November 2019. To accomplish our objectives, we interviewed personnel responsible for the FBI's inventory of firearms, ammunition, less lethal munitions, diversionary devices and explosives at 15 FBI sites throughout the United States, as well as officials at the FBI's Headquarters. This included officials from the Finance, Inspection, Training, and Laboratory Divisions, and Critical Incident Response Group. We also evaluated the FBI's policies governing weapons, munitions, and explosives. Our primary references were the FBI's Firearms Policy Guide (0888PG), Personal Property Management Policy Guide (0948PG), DSU Principal Firearms Instructor Administrative Reference, Hazardous Devices Operations Center Policy Guide (0233PG), and the Field Evidence Management Policy Guide (0780PG). Additionally, we examined FBI Form FD-281, Receipt for Government Property; Form FD-500, Report of Lost or Stolen Property; and Form FD-519, Requirements and Certification for Cannibalization and Destruction of Equipment.

We conducted site work at 15 FBI office locations. We judgmentally selected these sites in order to examine a broad range of FBI offices and functions, including large division field offices; smaller resident agencies; the Firearms Training Unit; the Defensive Systems Unit; the Critical Incident Response Group's Tactical Section; the Hazardous Devices School; and the Laboratory Division's Firearms/Toolmarks Unit.

The purpose of our site work was to assess the FBI's compliance with policies regarding its weapons, munitions, and explosives, as well as the effectiveness of those policies, and to determine if the FBI's weapons, munitions, and explosives inventories were accurate. We also wanted to determine if the FBI's controls over weapons, munitions, and explosives varied among different locations. We interviewed officials at each location, including supervisors, primary firearms instructors, special agent bomb technicians, and evidence control technicians. We observed the physical security of the sites' weapons, munitions, and explosives inventories. We also reviewed firearm records from the Asset Management System

(AMS); and tracking documentation for ammunition, less lethal munitions, diversionary devices, and explosives.

We conducted a physical inventory of FBI-owned weapons, munitions, and explosives. This included verifying the existence of a sample of firearms at all of the sites, which were selected from AMS. We also selected a sample of firearms while on-site and traced those items back to AMS, in order to determine if the inventory records were complete. We then analyzed select data fields in AMS in order to assess the accuracy of those fields. In addition, we conducted physical inventories of ammunition, less lethal munitions, diversionary devices, and explosives on-hand to determine if all of the items were properly accounted for using inventory tracking documentation. Similarly, we conducted a physical inventory of firearm and ammunition evidence. This included verifying the existence of a sample of firearm and ammunition evidence from SENTINEL at each location. We also selected a sample of firearm and ammunition evidence while on-site and traced those items back to the inventory list to determine if the SENTINEL records were complete.

We reviewed documentation related to firearms and explosives purchases to ensure that acquisitions were properly recorded. Finally, we reviewed documentation related to firearms that were reported as lost or stolen during the scope of our audit to determine whether the FBI took appropriate action.

Statement on Compliance with Generally Accepted Government Auditing Standards

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). 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.

Internal Controls

In this audit, we performed testing of internal controls significant within the context of our audit objectives. We did not evaluate the internal controls of the FBI to provide assurance on its internal control structure as a whole. FBI's management is responsible for the establishment and maintenance of internal controls in accordance with OMB Circular A-123. Because we do not express an opinion on the FBI's internal control structure as a whole, we offer this statement solely for the information and use of the FBI.⁵

⁵ This restriction is not intended to limit the distribution of this report, which is a matter of public record.

In planning and performing our audit, we identified the following internal control components and underlying principles as significant to the audit objectives:

Internal Control Components & Principles Significant to the Audit Objectives	
Control Environment Principles	
	The oversight body should oversee the entity's internal control system.
	Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives.
Control Activity Principles	
	Management should design control activities to achieve objectives and respond to risks.
	Management should design the entity's information system and related control activities to achieve objectives and respond to risks.
	Management should implement control activities through policies.
Information & Communication Principles	
	Management should internally communicate the necessary quality information to achieve the entity's objectives.
Monitoring Principles	
	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
	Management should remediate identified internal control deficiencies on a timely basis.

We assessed the design, implementation, and operating effectiveness of these internal controls and identified deficiencies that we believe could affect the FBI's ability to effectively and efficiently operate, and to ensure compliance with laws and regulations. However, because our review was limited to internal control components and underlying principles determined to be significant to the audit objectives, it may not have disclosed all deficiencies that may have existed at the time of this audit. The internal control deficiencies we found are discussed in the Audit Results section of this report.

Sample-based Testing

To accomplish our audit objectives, we performed sample-based testing for our evaluation of the accuracy and completeness of the FBI's inventories of firearms, ammunition, less lethal munitions, diversionary devices, explosives, and firearm and ammunition evidence. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the areas we reviewed. This non-statistical sample design did not allow projection of the test results to the universe from which the samples were selected.

Computer-Processed Data

During our audit, we obtained inventory information from the FBI's Asset Management System (AMS), and SENTINEL. We did not test the reliability of those systems as a whole, therefore any findings identified involving information from those systems were verified with documentation from other sources.

We assessed the reliability of the inventory data received from AMS and SENTINEL through our physical inventories of FBI-issued firearms and firearm and

ammunition evidence. We compared the data obtained through our physical inspection of these items against the information recorded in AMS and SENTINEL to ensure it was complete and accurate. We brought any identified discrepancies to the attention of the FBI, and worked with FBI employees to correct the discrepancies. As a result of these efforts, we determined that the AMS and SENTINEL data was sufficiently reliable for the purposes of this report.

THE FBI'S RESPONSE TO THE DRAFT AUDIT REPORT



U.S. Department of Justice
Federal Bureau of Investigation
935 Pennsylvania Avenue NW
Washington, D.C. 20535

The Honorable Michael E. Horowitz
Inspector General
Office of the Inspector General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530

Dear Mr. Horowitz:

The Federal Bureau of Investigation (FBI) appreciates the opportunity to review and respond to your office's report entitled, *Audit of the Federal Bureau of Investigation's Controls over Weapons, Munitions, and Explosives*.

We are pleased you recognized "the FBI has strong physical controls over its unassigned firearms" as well as "strong physical controls over firearm and ammunition evidence and access to the Evidence Control Rooms". We are further pleased that "despite the lack of policy" you "found that the FBI stored its less lethal munitions and diversionary devices in a secure area with limited access".

We agree that the FBI must "improve...controls over its weapons, ammunition, less lethal munitions, diversionary devices, and explosives." In that regard, we concur with your 13 recommendations for the FBI.

Should you have any questions, feel free to contact me. We greatly appreciate the professionalism of your audit staff throughout this matter.

Sincerely,

A handwritten signature in black ink that reads "Renae M. McDermott".

Renae M. McDermott
Assistant Director
Training Division

Enclosure

**RESPONSES TO RECOMMENDATIONS FOR THE AUDIT OF THE FEDERAL
BUREAU OF INVESTIGATION'S CONTROLS OVER WEAPONS, MUNITIONS, AND
EXPLOSIVES (19-38)**

1. **Recommend that FBI management:** Ensure all firearms in its custody are properly entered into the appropriate property management system.

FBI Response: The FBI concurs with this recommendation. The FBI will continue to ensure that all firearms are properly entered into the Asset Management System (AMS) in accordance with the FBI's Personal Property Management Policy Guide.

2. **Recommend that FBI management:** Ensure all firearms in its inventory have a designated property custodian, in accordance with policy.

FBI Response: The FBI concurs with this recommendation. DSU has coordinated with the identified Divisions, and all asset records have been amended to reflect the required Custodian. Furthermore AMU has submitted a request to the Information Technology Enterprise Services Division to program an addition to the AMS data entry process, which requires all property items classified as "08" (Weapons) to have—at a minimum—a mandatory field for the assignment of a Custodian prior to saving the record.

In the past year, the FBI has identified a significant turnover within the ranks of the Principal Firearms Instructor community. As a result, DSU and FTU have initiated the process to:

- A. Revise the Principal Firearms Instructor Administrative Reference (PFIAR) to update policies/protocols and which also incorporates OIG observations.
 - B. Implement a new-PFI on-boarding procedure which emphasizes principle objectives within the PFIAR.
 - C. Communicate the aforementioned points (A & B) to all Principal Firearms Instructors during the annual PFI conference in April 2020. Establish collaborative working groups to further identify issues and resolutions to be adopted Bureau-wide via the Firearms Program.
3. **Recommend that FBI management:** Ensures that complete documentation of lost and stolen FBI firearms is maintained, including all pertinent information such as the firearm make, model, and serial number.

FBI Response: The FBI concurs with this recommendation. The Firearms Policy Guide (0888PG) will be updated to reflect current standard operating procedures

(SOPs) and the PFIAR guidelines for lost or stolen weapons. 0888PG is under review at this time.

4. **Recommend that FBI management:** Ensure that the status of all lost or stolen firearms that are subsequently recovered is accurately reflected in AMS.

FBI Response: The FBI concurs with this recommendation. The Firearms Policy Guide (0888PG) will be updated to reflect current standard operating procedures (SOPs) and the PFIAR guidelines for lost or stolen weapons which have been recovered. 0888PG is under review at this time.

5. **Recommend that FBI management:** Amend its policy for tracking ammunition to require that all rounds of each type of ammunition be tracked using handwritten logs that detail the date, caliber, quantity in or out, purpose of the ammunition transaction, and remaining balance; and require all ammunition tracking logs to be retained for at least 3 years.

FBI Response: The FBI concurs with this recommendation. The Firearms Policy Guide (0888PG) will be updated to reflect the following addition: "Ammunition inventories will be maintained through the use of written inventory sheets showing the date of transaction, ammunition name, caliber, transaction in or out, and purpose of transaction. These sheets will be maintained for three years. On an annual basis, Field Office and HQ PFIs are required to submit an inventory of all on-hand ammunition, by caliber and type to FTU. This information is required by Finance Division to account for Bureau assets and by DSU for program oversight purposes. This inventory is normally initiated in the fourth quarter of the fiscal year."

6. **Recommend that FBI management:** Revise its current policy to require its offices to conduct a complete inventory of all ammunition on hand on an annual basis to ensure all recorded ammunition inventory balances are accurate, and to retain those records for at least 3 years.

FBI Response: The FBI concurs with this recommendation. The Firearms Policy Guide (0888PG) will be updated to reflect the following addition: "On an annual basis, Field Office and HQ PFIs are required to submit an inventory of all on-hand ammunition, by caliber and type to FTU. This information is required by Finance Division to account for Bureau assets and by DSU for program oversight purposes. This inventory is normally initiated in the fourth quarter of the fiscal year and will be maintained for three years."

7. **Recommend that FBI management:** Establish policy requiring that less lethal munitions and diversionary devices must be stored in a secure area, with access limited to designated personnel.

FBI Response: The FBI concurs with this recommendation. The FBI/CIRG/Tactical Section is currently in the process of consolidating and updating three policies into one Tactical Policy Guide. The new Tactical Policy Guide will include storage requirements for less lethal munitions and diversionary devices and limit the access into this secure area to designated personnel.

8. **Recommend that FBI management:** Establish policy for tracking less lethal munitions and diversionary devices that requires all quantities of each type of less lethal munition and diversionary device to be tracked using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and require all less lethal munition and diversionary device tracking logs to be retained for at least 3 years.

FBI Response: The FBI concurs with this recommendation. The FBI/CIRG/Tactical Section is currently in the process of consolidating and updating three policies into one Tactical Policy Guide. The new Tactical Policy Guide will include guidance on tracking less lethal munitions and diversionary devices. This new guidance will detail the use of handwritten logs to include date, quantity in or out, purpose of the transaction, and remaining balance. Additionally it will mandate that the tracking be retained for at least 3 years.

9. **Recommend that FBI management:** Require its offices to conduct a complete physical inventory of all less lethal munitions and diversionary devices on an annual basis and retain those records for at least 3 years.

FBI Response: The FBI concurs with this recommendation. The FBI/CIRG/Tactical Section is currently in the process of consolidating and updating three policies into one Tactical Policy Guide. The new Tactical Policy Guide require offices to conduct a complete physical inventory of all less lethal munitions and diversionary devices annually and retain the records for at least 3 years.

10. **Recommend that FBI management:** Amend its policy requiring all quantities of each type of explosive material be tracked by its SABTs using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and retain all explosives tracking records for at least 3 years.

FBI Response: The FBI concurs with this recommendation. The FBI/CIRG/Counter-IED Section will draft interim policy on the responsibilities and requirements associated with explosives storage and accountability to ensure FBI personnel adhere

to established Standard Operating Procedures (SOP) to prevent the loss or theft of explosives without detection. As part of the interim policy, the explosives inventory procedures used by the FBI's Hazardous Devices School will be implemented in the procedures. The FBI/CIRG/Counter-IED Section is currently revising the Hazardous Devices Operations Center Policy Guide (0233PG, April 23, 2010). While the PG is being finalized and approved, it is necessary to provide interim policy to inform FBI personnel of the responsibilities and requirements for explosives control and storage. To maintain explosives inventory records, the FBI/CIRG/Counter-IED Section will establish a control file in Sentinel, the FBI's central recordkeeping system, for field office reporting of bi-annual explosives inventories and transaction logs. The Sentinel records will be maintained for at least three years.

11. **Recommend that FBI management:** Require its offices to conduct a complete physical inventory of all explosives on an annual basis and retain those records for at least 3 years.

FBI Response: The FBI concurs with this recommendation. Through the FBI/CIRG/Counter-IED Section interim policy for explosives storage and accountability, FBI personnel will adhere to a standardized explosives tracking and inventory process and log all movement of explosives in and out of approved storage locations. FBI field offices will be required to conduct a complete physical inventory of all explosives on a bi-annual basis and document inventories with transaction logs to the appropriate Sentinel files for FBI/CIRG/Counter-IED Section review. The FBI/CIRG/Counter-IED Section will establish a control file in Sentinel for field office reporting of bi-annual explosives inventories and transaction logs and will maintain records for at least three years.

12. **Recommend that FBI management:** Amend its policy to require Evidence Control Technicians to obtain and upload a notification of destruction from the FTU prior to marking the firearm evidence as disposed in SENTINEL, and require the firearm evidence disposal date in SENTINEL to reflect the date the firearm is destroyed.

FBI Response: The FBI concurs with this recommendation. As such, the Laboratory Division (LD) proposes the following changes to address the recommendation:

- A. As noted in the FBI response to Recommendation 13, the Field Evidence Management Policy Guide will be changed to require the ECT to disposition the weapon in Sentinel by using the date of receipt of the weapon(s) by the LD. The date is obtained from the documentation of delivery provided by the trackable carrier (see LD response to OIG Recommendation 13, Item 4).
- B. The LD has always issued an Electronic Communication (EC) in Sentinel when the final destruction of submitted firearms occurs. This EC includes the serial number and the FBI Case ID for each destroyed firearm. The EC will

be modified by the LD so that all Field Offices/Resident Agencies ECTs, who have submitted firearms for the most recent destruction, receive the EC via Sentinel.

- C. The Field Evidence Management Policy Guide will be changed to require ECTs, upon receipt of the latest LD's firearms destruction EC via Sentinel, to upload that EC into their relevant case file(s) to document the final destruction of the related firearm(s).

13. **Recommend that FBI management:** Require proof of delivery to be maintained in SENTINEL for firearms evidence shipped to the FTU for disposal.

FBI Response: The FBI concurs with this recommendation. The Laboratory Division (LD) proposes the following changes to address this recommendation:

The LD will modify the Field Evidence Management Policy Guide to require the following actions when firearms are shipped from FBI Fields Offices/Resident Agencies to the LD for destruction:

- A. The respective ECT prepares the firearm for shipment to the LD for destruction.
- B. The ECT ships the weapon(s) to the LD through a trackable carrier.
- C. The ECT serializes the return receipt from the trackable carrier (e.g. Registered Mail or FedEx signature page) into Sentinel and maintains a hard copy of the return receipt with the FD-1004 for future storage of these documents in the 1A envelope.
- D. ECT dispositions the weapon in Sentinel as disposed, using the date on the receipt from the trackable carrier which confirms the weapon(s) has (have) been received by the LD for destruction.

**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 the FBI. The FBI's response is incorporated in Appendix 2 of this final report. In response to our audit report, the FBI concurred with our recommendations and discussed the actions it will implement in response to our findings. As a result, the status of the audit report is resolved. The following provides the OIG analysis of the response and summary of actions necessary to close the report.

Recommendations for the FBI:

- 1. Ensure all firearms in its custody are properly entered into the appropriate property management system.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it will continue to ensure that all firearms are properly entered into the Asset Management System in accordance with the FBI's Personal Property Management Policy Guide.

This recommendation can be closed when we receive documentation supporting that the FBI has identified the rightful owner of the two firearms of unknown origin found in the Madison Resident Agency and taken appropriate action.

- 2. Ensure all firearms in its inventory have a designated property custodian, in accordance with policy.**

Resolved. The FBI concurred with our recommendation. In its response, the FBI stated that the Defensive Systems Unit has amended all asset records to reflect the required custodian. Additionally, the Asset Management Unit has submitted a request to program an addition to the AMS data entry process that requires all weapons to have an assigned property custodian before the record can be saved. Further, the FBI will revise the Principal Firearms Instructor Administrative Reference (PFIAR) to update policies and protocols incorporating OIG observations, and communicate these points during the annual PFI conference in April 2020. Finally, the FBI stated that it would establish collaborative working groups to further identify firearm-related issues and resolutions to be adopted throughout the FBI.

This recommendation can be closed when we receive documentation supporting that the FBI has reprogrammed the AMS data entry process requiring all weapons to have an assigned property custodian before the record can be saved and the PFIAR has been updated to incorporate OIG observations.

- 3. Ensures that complete documentation of lost and stolen FBI firearms is maintained, including all pertinent information such as the firearm make, model, and serial number.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it will update the Firearms Policy Guide and the PFIAR to reflect current standard operating procedures and guidelines for lost or stolen weapons.

This recommendation can be closed when we receive documentation supporting that the FBI has updated the Firearms Policy Guide and PFIAR guidelines for lost or stolen weapons.

- 4. Ensure that the status of all lost or stolen firearms that are subsequently recovered is accurately reflected in AMS.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it will update the Firearms Policy Guide and the PFIAR to reflect current standard operating procedures and guidelines for recovered lost or stolen weapons.

This recommendation can be closed when we receive documentation supporting that the FBI has updated the Firearms Policy Guide and PFIAR guidelines for recovered lost or stolen weapons.

- 5. Amend its policy for tracking ammunition to require that all rounds of each type of ammunition be tracked using handwritten logs that detail the date, caliber, quantity in or out, purpose of the ammunition transaction, and remaining balance; and require all ammunition tracking logs to be retained for at least 3 years.**

Resolved. The FBI concurred with our recommendation. In its response, the FBI stated that the Firearms Policy Guide will be updated to require ammunition inventories to be maintained through the use of handwritten inventory sheets showing the date of transaction, ammunition name, caliber, transaction in or out, and purpose of the transaction. These sheets will be maintained for 3 years.

This recommendation can be closed when we receive documentation supporting that the Firearms Policy Guide has been updated to require all ammunition inventories to be maintained using handwritten logs showing the transaction date, caliber, quantity in or out, purpose of the ammunition transaction, and remaining balance on hand; and for these logs to be retained for 3 years.

- 6. Revise its current policy to require its offices to conduct a complete inventory of all ammunition on hand on an annual basis to ensure all recorded ammunition inventory balances are accurate, and to retain those records for at least 3 years.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that it will update the Firearms Policy Guide to require PFIs, on an annual basis, to submit an inventory of all ammunition on hand, by caliber and type, to the Firearms Training Unit, and maintain the inventory for 3 years.

This recommendation can be closed when we receive documentation supporting that the FBI has updated the Firearms Policy Guide requiring PFIs to conduct an annual physical inventory of all ammunition on hand to ensure the inventory balances on the handwritten tracking logs are accurate.

- 7. Establish policy requiring that less lethal munitions and diversionary devices must be stored in a secure area, with access limited to designated personnel.**

Resolved. The FBI concurred with our recommendation. In its response, the FBI stated that the Tactical Section is currently consolidating and updating three policies into one Tactical Policy Guide that will include storage requirements for less lethal munitions and diversionary devices, and limit access to the secure storage area to designated personnel.

This recommendation can be closed when we receive documentation supporting that the Tactical Policy Guide has been implemented, establishing secure storage requirements for less lethal munitions and diversionary devices, and limiting access to the storage area to designated personnel.

- 8. Establish policy for tracking less lethal munitions and diversionary devices that requires all quantities of each type of less lethal munition and diversionary device to be tracked using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and require all less lethal munition and diversionary device tracking logs to be retained for at least 3 years.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that the Tactical Section is currently consolidating and updating three policies into one Tactical Policy Guide that will establish guidance on tracking less lethal munitions and diversionary devices using handwritten logs that include the date, quantity in or out, purpose of the transaction, and remaining balance. The policy guide will also require the tracking logs to be retained for at least 3 years.

This recommendation can be closed when we receive documentation supporting that the Tactical Policy Guide has been implemented, establishing

the requirement to track less lethal munitions and diversionary devices using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance on hand; and mandate that the logs be retained for at least 3 years.

9. **Require its offices to conduct a complete physical inventory of all less lethal munitions and diversionary devices on an annual basis and retain those records for at least 3 years.**

Resolved. The FBI concurred with our recommendation. In its response, the FBI stated that the Tactical Section is currently consolidating and updating three policies into one Tactical Policy Guide that will require offices to conduct a complete annual physical inventory of all less lethal munitions and diversionary devices and retain the records for at least 3 years.

This recommendation can be closed when we receive documentation supporting that the Tactical Policy Guide has been implemented, requiring offices to conduct a complete annual physical inventory of all less lethal munitions and diversionary devices and retain the records for at least 3 years.

10. **Amend its policy requiring all quantities of each type of explosive material be tracked by its SABTs using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and retain all explosives tracking records for at least 3 years.**

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that the Counter-IED Section is currently revising the Hazardous Devices Operations Center Policy Guide. While the Policy Guide is being finalized and approved, the Counter-IED Section will draft interim policy on the responsibilities and requirements associated with explosives storage and accountability to ensure that FBI personnel adhere to established Standard Operating Procedures to prevent the loss or theft of explosives without detection. The explosives inventory procedures used by the Hazardous Devices School will be implemented through this interim policy. To maintain explosives inventory records, the Counter-IED Section will establish a control file in Sentinel, the FBI's central recordkeeping system, for field office reporting of bi-annual explosives inventories and transaction logs, which will be maintained for at least 3 years.

This recommendation can be closed when we receive documentation supporting that the interim policy has been established, and incorporated into the revised Hazardous Devices Operations Center Policy Guide, requiring all quantities of each type of explosive material be tracked using handwritten logs that detail the date, quantity in or out, purpose of the transaction, and remaining balance; and that those explosives tracking records are retained for at least 3 years.

11. Require its offices to conduct a complete physical inventory of all explosives on an annual basis and retain those records for at least 3 years.

Resolved. The FBI concurred with our recommendation. The FBI stated in its response that the interim policy will require FBI personnel to adhere to a standardized explosives tracking and inventory process and log all movement of explosives in and out of approved storage locations. Specifically, the FBI field offices will be required to conduct a complete physical inventory of all explosives on a bi-annual basis and document inventories with transaction logs to the appropriate Sentinel files for review by the Counter-IED Section. These records will be maintained for at least 3 years.

This recommendation can be closed when we receive documentation supporting that the interim policy has been established, and incorporated into the revised Hazardous Devices Operations Center Policy Guide, requiring field offices to conduct a complete bi-annual physical inventory of all explosives on hand and retain those records for at least 3 years.

12. Amend its policy to require Evidence Control Technicians to obtain and upload a notification of destruction from the FTU prior to marking the firearm evidence as disposed in SENTINEL, and require the firearm evidence disposal date in SENTINEL to reflect the date the firearm is destroyed.

Resolved. The FBI concurred with our recommendation. In its response, the FBI explained that the Laboratory Division has always issued an Electronic Communication (EC) in Sentinel when the final destruction of submitted firearms occurs. This EC will be modified so that all field office Evidence Control Technicians (ECTs), who have submitted firearms for destruction, receive the EC via Sentinel. The FBI also stated that the Laboratory Division proposes that the Field Evidence Management Policy Guide be changed to require the following actions:

- (a) Require the ECT to disposition weapons in Sentinel by using the date of receipt of the weapon by the Laboratory Division. The date will be obtained from the documentation of delivery provided by the trackable carrier, which confirms the weapon has been received by the Laboratory Division.
- (b) Require the ECTs, upon receipt of the latest Laboratory Division's firearms destruction EC via Sentinel, to upload that EC into their case file to document the final destruction of the related firearm.

This recommendation can be closed when we receive documentation supporting that: (1) the EC in Sentinel communicates the final destruction date to the appropriate ECT; and (2) the Field Evidence Management Policy Guide has been revised to require the firearm disposal date to reflect the

date of delivery to the Laboratory Division, and the final disposition EC to be included in the case file.

13. Require proof of delivery to be maintained in SENTINEL for firearms evidence shipped to the FTU for disposal.

Resolved. The FBI concurred with our recommendation. In its response, the FBI stated that the Laboratory Division proposes changes to the Field Evidence Management Policy Guide to require the following actions when firearms are shipped to the Laboratory Division for destruction:

- (a) The respective ECT prepares the firearm for shipment to the Laboratory Division.
- (b) The ECT ships the weapon to the Laboratory Division through a trackable carrier.
- (c) The ECT serializes the return receipt from the trackable carrier (e.g., Registered Mail or FedEx signature page) into Sentinel and maintains a hard copy of the return receipt.
- (d) ECT dispositions the weapon in Sentinel as disposed, using the date on the receipt from the trackable carrier which confirms the weapon has been received by the Laboratory Division for destruction.

This recommendation can be closed when we receive documentation supporting that the Field Evidence Management Policy Guide has been revised to require the disposal procedures described in the FBI's response.



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