

**AUDIT REPORT
14-14**

Acquisition of U.S. Passport eCovers

August 1, 2014

Date

August 1, 2014

To

Director, Acquisition Services

From

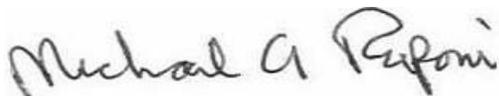
Inspector General

Subject:

Audit Report – Acquisition of U.S. Passport eCovers
Report Number 14-14

Enclosed please find the subject final report. Please refer to the “Results in Brief” for the overall audit results. Our evaluation of your response has been incorporated into the body of the report. We consider management’s comments responsive to the recommendations. The recommendations are resolved. Recommendations 1 and 3 will be closed upon issuance of this report. Recommendations 2 and 4 will remain open pending completion of the planned corrective actions.

We appreciate the courtesies extended to the audit staff during our review. If you have any questions or comments about this report, please do not hesitate to contact Mr. Jeffrey C. Womack, Assistant Inspector General for Audits and Inspections at (202) 512-2009 or me at (202) 512-0039.



MICHAEL A. RAPONI
Inspector General

Enclosure

cc:

Public Printer

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Office of Inspector General

Report Number 14-14

August 1, 2014

Acquisition of U.S. Passport eCovers

Introduction

The Office of Inspector General (OIG) conducted an audit in response to complaints alleging, in general, that GPO structured and/or steered the acquisition of U.S. passport eCovers in favor of one incumbent contractor—Infineon Technologies North America Corporation (Infineon). A key element of the complaint alleged that GPO mandated the use of an electronic passport chip operating system (OS) that was available to only Infineon, thereby restricting competition. A second key element of the complaint alleged that GPO ignored a known security weakness associated with the Infineon-manufactured integrated circuit (IC), allowing Infineon to compete for the contract award.

To address the allegation, we evaluated the steps GPO took in procuring the U.S. passport eCovers. We also reviewed key factors GPO considered regarding the OS and IC specifications required in the solicitation.

By agreement with the Department of State (DOS), GPO manufactures blank passport books. Among the many components used to manufacture the books are the eCovers. The eCovers include the manufacturing and inlaying of the contactless IC with an antenna assembly. The ICs used in eCovers contain a central processing unit, OS software, and various types of memory.

In April 2010, GPO issued a contract solicitation for eCovers. GPO received 12 proposals in response to the solicitation. In August 2012, GPO awarded contracts to two prime contractors—Infineon and Gemalto Inc. (Gemalto). The contracts were for up to 5 years. GPO reported in FedBizOpps.gov the estimated award amount as \$125 million to \$175 million over the life of the contract for each contractor. Both companies have supplied GPO since inception of the eCover, which was initially deployed in 2005.

We conducted our audit fieldwork from May 2013 through May 2014. To review the allegations we obtained a response from GPO to each allegation. We analyzed the responses, reviewed award protest and hearing documents, interviewed representatives of the company filing the protest, and interviewed officials from GPO's Acquisition Services and Security and Intelligent Documents (SID) business units. We reviewed applicable GPO Publication 805.33, *Materials Management Acquisition Regulation (MMAR)*, dated May 15, 2003, requirements, the eCover Acquisition Plan, and the contract solicitation. We met with GPO officials to ensure an adequate understanding of GPO's actions taken during the award process and the basis for those actions. We examined contract documents to determine whether

steps were sufficiently performed as defined in the MMAR, eCover Acquisition Plan, and contract.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that provides 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 objective. Our objectives, scope, methodology, and criteria are detailed in Appendix A.

Results in Brief

We did not substantiate the allegation that GPO structured and/or steered the acquisition in favor of one incumbent contractor—Infineon. However, GPO did not always follow prescribed steps during the acquisition process. Without following its own requirements defined in the MMAR, the eCover Acquisition Plan, and GPO internal control requirements, GPO may have increased its vulnerability to protests, increased its risk that the acquisition process was vulnerable to improper influence, and may have resulted in management being unable to assure contracts were in the best interest of the GPO and that the risks associated with the security of the eCovers were minimized. We attribute the vulnerabilities and increased risks to insufficient involvement by the CO and insufficient oversight and monitoring of the eCover acquisition process.

GPO could not always demonstrate it performed a review of key evaluation factors. The proposal compliance review, company/key management personnel evaluation, and financial review evaluation factors were not documented as having been performed. Although the SID office documented market research, testing, security evaluations, and pre-award survey factors as having been performed, documentation of a review and/or approval by the contracting officer (CO) was missing.

Prescribed steps associated with acquisition team roles and responsibilities were not always followed. The eCover Acquisition Plan states that the Technical Evaluation Board (TEB) Chairperson review all aspects of each proposal, prepare a written summary of the results of the evaluation, and ensure that panel members conduct a comprehensive evaluation of the proposals in an impartial and equitable manner. The TEB is responsible for preparing and submitting evaluation reports to the Chairperson. The Chairperson was responsible for transmitting the documentation to the CO. We identified a number of key instances when the GPO Acquisition Team did not follow that process:

- On May 25, 2012, the SID Chief Technology Evaluation Officer (CTEO) instead of the TEB Chairperson sent a memorandum to the CO stating the eCover

samples submitted by an offeror failed the requirements set forth in the request for proposal.

- On July 3, 2012, the CTEO instead of the TEB Chairperson sent a memorandum to the CO stating that he concurred with the findings and results of the security evaluation conducted by another member of the TEB.
- Our analysis of testing documentation showed that the CTEO had significant input throughout the process. We noted the CTEO, and not the TEB Chairperson, determined whether a proposed sample of eCovers was suitable to move forward to the production floor for additional testing, and for one offeror being eliminated during this phase, the CTEO was the only individual to sign the test document.
- Documents used to certify testing results were often signed by the CTEO but not certified by the TEB Chairperson.

GPO SID personnel explained that the intention was that the TEB and its Chairperson would only be responsible for one proposal evaluation factor, "Technical Proposal Evaluation." However, neither the eCover Acquisition Plan nor the contract file documented that intention.

There were also inconsistencies regarding disposition of select test results. The solicitation stated that if a product was given a "Fail" at any point, the proposal would be deemed "Technically Unacceptable" and would not receive further consideration. However, that requirement was not applied consistently to all proposals. For example, test results revealed that the eCover sample products submitted by one offeror failed the requirement for the inlay to be smooth and continuous from the edge of the cover to the hinge gap. Test results also revealed the same eCover sample products failed the requirement for the eCovers to lie flat. The testing was suspended and the offeror was notified that the proposal was not accepted for award because the product failed testing requirements. However, in subsequent tests for the remaining proposals, read time data sheets revealed sampled products failed the time for reading test. Specifically, the datasets sampled exceeded the less than or equal to 3-second specification. Yet, the products were determined to be technically acceptable with no documented explanation. The CTEO stated that the time for reading test was not meant to be a pass/fail test. However, that intention was not documented in the contract solicitation. As a result GPO could leave itself open to questioning the \$15 million dollar annual cost difference between bid prices of the offeror that failed testing and the highest bidder that was deemed technically acceptable but also failed testing.

Recommendations

We recommended the Director, Acquisition Services: (1) ensure contracting officers are engaged in the acquisition process by monitoring key activities that will ensure they follow GPO policy, (2) ensure key procurement steps, decisions, and deviations are fully documented and reviewed, (3) ensure that the roles and responsibilities for the members on large complex acquisitions are clearly defined and monitored, and (4) provide training that ensures contracting officers proficiency of technology used to manufacture eCovers.

Management's Response

Management concurred with each recommendation and has taken or planned corrective actions that are responsive to the report's recommendations.

In the response, the Director of Acquisition Services wrote that the U.S. Passport supply chain is subjected to stringent and continuous audits and that all supply chain company executives, principles, and senior management are vetted with a background check by DOS. We note that the major suppliers are generally reviewed once every two years. However, GPO could not provide any evidence that the DOS conducted the background investigations of the supply chain executives as required by the contract.

In addition, the Director of Acquisition Services wrote that he did not agree that there were vulnerabilities and increased risks due to insufficient involvement by the CO and insufficient oversight and monitoring of the e-Cover acquisition process as it related to the participation of the CTEO. We continue to report that by not adequately documenting testing actions, discrepancies, and deviations, this may allow or give the appearance that program officials can exert undue influence over the procurement process.

The Director of Acquisition Services also wrote that the presence of the completed past performance questionnaires in the contract file was evidence that GPO attempted to acquire past performance and that the CO relied upon the information provided in the questionnaires for the evaluation of that factor (past performance). We reiterate that the contract also required an assessment of references listed in each Offeror's proposal, other customers known to the Government, and consumer protection organizations and others who may have useful and relevant knowledge of the Offeror's past performance. We found no evidence where GPO acquire past performance from those other required sources and no documented summary of the overall evaluation.

Based on management's response, we made one technical adjustment to our draft report regarding a reference to the Infineon SLE 78 IC. The complete text of management's response is in Appendix C.

Background

In October 2012, the OIG received an anonymous complaint alleging process irregularities with the acquisition of U.S. Passport eCovers. It was alleged that the procurement process appeared to be structured in favor of the incumbent contractor—Infineon. In December 2013, the OIG received a second complaint alleging irregularities with the eCover acquisition process. That allegation suggested that the eCover acquisition process, in general, contained errors and inconsistencies. The allegation did not specify the errors and inconsistencies.

The U.S. Passport and the eCover

U.S. passports are official documents used to demonstrate the bearer's identity and citizenship for international travel and reentry into the United States. Under U.S. law, the Secretary of State has the authority to issue passports. By agreement with DOS, GPO manufactures blank passport books. Among the many components used to manufacture passport books are eCovers of the passports. The eCovers include manufacturing as well as inlaying each contactless IC with an antenna assembly. The ICs used in the eCovers contain a central processing unit, OS software, and various types of memory.

Responsibilities

GPO policy¹ requires that the Chief Acquisition Officer is responsible for assuring that all contracts, including interagency agreements, are in accordance with applicable laws, regulations, and directives. In addition, the MMAR establishes uniform policies and procedures covering all aspects of acquisitions that GPO uses. The SID Business Unit is responsible for producing secure Government documents for a wide variety of applications including passports.

Select GPO Policies and Procedures

The MMAR provides policies and procedures necessary to conduct GPO procurements. The objective of the MMAR is to deliver, on a timely basis, the best value product or service to the customer, while maintaining the public's trust and fulfilling public policy objectives. The MMAR addresses key areas such as the roles and responsibilities of the acquisition team, maintenance of contract files, and timing and content of the acquisition plan.

The eCover Acquisition Plan documents the makeup and responsibilities of the various eCover acquisition oversight teams. The TEB included one chairperson and three SID personnel, six DOS personnel, and one representative from the Department of Homeland Security. The TEB was responsible for conducting a comprehensive review and evaluating the proposals based on the contract

¹ GPO Instruction 110.5D, *Acquisition Authority, Policies, and Responsibilities*, dated March 19, 2004.

solicitation requirements and seven evaluation criteria. At the conclusion of the evaluation, the TEB was required to prepare and submit evaluation reports and information for debriefing unsuccessful bidders to the Chairperson. The Chairperson was responsible for preparing a written summary of the results of the evaluation and ensuring that panel members conducted a comprehensive evaluation of the proposals in an impartial and equitable manner. The CO was responsible for reviewing the Chairperson's summaries, and a GPO Advisory Council (AC) was set up to monitor the TEB.

Management Control Guidelines

GPO policy requires² that management controls must provide reasonable assurance and safeguards to protect assets against waste, loss, unauthorized use, and misappropriation. It requires that GPO maintain effective systems of accounting and management control. The policy states that internal controls are the organization, policies, and procedures used to reasonably ensure that:

- Programs achieve intended results
- Resources are used consistent with agency mission
- Programs and resources are protected from waste, fraud, and mismanagement
- Laws and regulations are followed
- Reliable and timely information is obtained, maintained, reported, and used for decision making

The policy further requires documentation of internal controls. Such documentation should include written policies, organization charts, procedural write-ups, manuals, memoranda, flowcharts, software, and related written materials describing the methods and measures for the internal controls and, as such, serve as a reference for individuals reviewing the internal controls and their functioning.

The Government Accountability Office (GAO) *Standards for Internal Controls in the Federal Government*, November 1999, require ongoing monitoring in the course of normal operation. Internal controls are performed continuously and ingrained in an agency's operations. GAO's standards include regular management and supervisory activities, comparisons, reconciliations, and other actions people take in performing their duties.

The GAO standards also require use of control activities described as the policies, procedures, techniques, and mechanisms that enforce management's directives, such as the process of adhering to requirements or budget development and execution. They help ensure that actions are taken to address risks. Control activities are an integral part of an entity's planning, implementing, reviewing, and

² GPO Instruction 825.18A, *Internal Control Program*, dated May 28, 1997.

accountability for stewardship of Government resources and achieving effective results.

The U.S. Office of Management and Budget (OMB) Circular No. A-123, *Management's Responsibility for Internal Control*, December 21, 2004, (Circular A-123) requires that managers develop and maintain effective internal controls. Effective internal controls provide assurance that significant weaknesses in the design or operation of internal controls that could adversely affect an agency's ability to meet its objectives would be prevented or detected in a timely manner.

As a legislative branch agency, GPO is not required to follow OMB Circulars, including Circular A-123. However, because the Circular provides a sound basis for internal controls for any organization, GPO has incorporated the major requirements of Circular A-123 in its directives.

Related Audit Work

OIG issued Report Number 14-08, *Information Technology Professional Services—Oracle Software*, on March 21, 2014. That audit disclosed that purchase orders and statements of work did not always provide a clear description of the required work and in many instances a statement of work could not be associated with a purchase order. It also revealed that GPO's contract files did not contain key planning documents that would support an overall strategy for managing the acquisition such as addressing the technical, business, management, and other significant considerations that control the acquisition.

OIG issued Report Number 11-07, *GPO Oversight of the Federal Digital System Master Integrator Contract*, on August 19, 2011. The audit identified that GPO did not comply with key requirements of the MMAR. OIG recommended that GPO develop written policies for administering procurements that include statements about the composition, roles, responsibilities, and training requirements of procurement teams; procedures for conducting contractor oversight including developing quality assurance surveillance plans; incorporating the use of Contracting Officer Representatives (CORs) in the procurement process; taking appropriate action to protect GPO's interest in the case of potential contractor non-performance; and maintaining complete contract files.

Results and Recommendations

We did not substantiate the allegation that GPO structured and/or steered the acquisition process in favor of one incumbent contractor—Infineon.

The audit disclosed that the IC operating system designated in the contract solicitation was the operating system required by GPO’s customer agency—DOS—for a number of reasons, all of which were vetted by the appropriate GPO and DOS officials and were clearly and fully documented in the GPO contract file.

We reviewed documents and were told that the Infineon IC (SLE 66) currently used in U.S. passports has not been compromised. This assertion is based on any relevant knowledge and available information. In addition, GPO has manufactured millions of passports using this IC (SLE 66) and is unaware of any known security related issues.

Also, no indication existed that GPO ordered excess quantities and/or paid Infineon excessive amounts compared to Gemalto. For the period January 2013 through April 2014, GPO payments for eCovers were as follows:

Table 1. Payment Amounts

Contractor Name	GPO Payment Amount
Gemalto	\$41,620,068
Infineon	\$36,325,381

Furthermore, the current contract award provides that GPO determine the quantity of eCovers required and then issue a Request for Quotes (RFQ) to both Gemalto and Infineon. The contractors must then provide quotes at or below their original proposed prices. Those contractors are then, at GPO’s discretion, awarded a pre-determined percentage of the order (from 0 – 100 percent), with a higher percentage being awarded to the contractor quoting the lowest price. GPO reserves the right to alter the split during the life of the contract.

While the audit did not substantiate the allegation, we did, however, note that GPO did not always follow its own requirements defined in the MMAR, the eCover Acquisition Plan, and GPO internal control requirements in administering the contract. Specifically, we noted:

- Key evaluation factors were not always documented.
- Prescribed steps associated with acquisition team roles and responsibilities were not always followed.
- Inconsistencies were present regarding the disposition of select test results.

Key Evaluation Factors Were Not Always Documented

GPO policy requires that the CO determine the application of rules, regulations, and policies on a specific contract. In addition, the eCover Acquisition Plan describes the organization elements used for guiding the procurement to achieve its goals as required in MMAR 1.102-3. The contract solicitation section M, "Evaluation and Award," requires that in order to be considered eligible for award, technical proposals must demonstrate a clear understanding of the nature and scope of the requirements. To determine whether the technical proposal was technically acceptable, GPO was required to evaluate the following key elements.

- Proposal Compliance Review
- Price Evaluation
- Duplicative Supply Chain Evaluation
- Company/Key Management Personnel Evaluation
- Technical Acceptance Evaluation
 - Technical Proposal Evaluation
 - Experience
 - Past Performance
 - Testing
 - Security Evaluation
 - Pre-Award Survey
 - Company Financial Review

We examined the contract file for CO involvement in those processes and observed the following:

Table 2. OIG Assessment of Evaluation Factors

Evaluation Factor	Contract Solicitation Requirements	Audited Results
Proposal Compliance Review	The Government will review all proposals for compliance to standards set forth in this RFP and the MMAR.	No documentation maintained.
Price Evaluation	Offeror's price proposals will be evaluated to determine proposed prices fair, realistic, and reasonable.	Documented and approved by CO. No exception noted.
Duplicative Supply Chain Evaluation	Due to the criticality of the eCover product to U.S. national security and to ensure a continuous supply of product, the Government intends to have a minimum of two unique supply chains with respect to the role of prime contractor and/or integrator.	Documented and approved by CO. No exception noted.
Company/Key Management Personnel Evaluation	Due to the criticality of the eCover product on U.S. national security, the Government requires and will be evaluating the contractor for adequate and appropriate controls over the security of the offeror's facilities (complete supply chain for the product) as well as the employees who shall work in these areas.	Program officials provided evidence that the background checks of all personnel from the offeror's team were to be performed by DOS; however, GPO could not provide any documentation that the background investigations were actually conducted. No documentation existed that the CO reviewed and/or approved the deviation.
Technical Proposal Evaluation	Offerors must demonstrate through its technical approach and description in respective proposals compliance with all of the Government's stated requirements.	Documented and approved by CO. No exceptions noted.
Experience	Offerors must demonstrate the following experience as a prime contractor and/or integrator: recent (within past 2 years) and relevant work experience; produced at a minimum of 1,000,000 eCovers in past 2 years; experience with contactless electronics; must have worked with like product (chip and antenna embedded in protective envelope adhered to cover material).	Documented and approved by CO. No exception noted.
Past Performance	Past performance will be evaluated to determine if an offeror has satisfactorily performed the same or similar services. Past performance information will be obtained from: <ul style="list-style-type: none"> • Past Performance Questionnaires (Section J- Attachment Q, <i>Past Performance Questionnaire</i>), • references listed in each Offeror's proposal, • other customers known to the Government, • consumer protection organizations and others who may have useful and relevant knowledge of the Offeror's past performance. 	We examined the contract files and although we found completed questionnaires we found no evidence where GPO attempted to acquire past performance from the other required sources (i.e., references listed in each Offeror's proposal, other customers known to the Government, consumer protection organizations, and others who may have useful and relevant knowledge of the Offeror's past performance) and no documented summary of the overall evaluation.
Testing	Prior to award, an offeror's product samples will be evaluated in production and lab environments. Testing will occur in three stages (and eight phases). Stage 1 Testing consists of GPO Technical and bindery tests. Stage 2 Testing consists of DOS technical and personalization tests followed by Stage 3, Independent Lab Testing.	GPO did not follow the contract requirements in conducting the testing. Specifically, under Stage 1 testing, GPO did not consistently follow prescribed procedures for sign-offs and certification for documenting its testing results. Under the Stage 2 testing, all offerors and integrators failed to meet one of the test criteria, yet, despite that failure, none of the offers was deemed technically unacceptable. No documentation existed that the CO reviewed and/or approved the deviation.
Security Evaluation	The Government will perform background checks on personnel of the offeror's team (Section C15) and will conduct a site visit.	See narrative below. No documentation existed that the CO reviewed and/or approved the deviation.
Pre-Award Survey	The Government will conduct a Pre-Award Survey and site visits to validate an offeror's proposal or proposals, production processes, and complete supply chain.	See narrative below. No documentation existed that the CO reviewed and/or approved the request.
Company Financial Review	The Government will conduct a financial review to determine the offeror's financial stability.	No documentation maintained.

In addition to the factors listed above, a market research report was prepared but not signed by the CO or any other GPO acquisition official. The MMAR³ states that the CO must conduct market research appropriate to the circumstances.

Security Evaluation

The contract solicitation required that the Government perform background checks on the personnel of an offeror's team and conduct a site visit of each offeror. The contract solicitation also required that the Government conduct a security evaluation of each complete supply chain (for both prime and subcontractors). The contract file contains documentation that the GPO Director of Product Security performed a security assessment on only one prospective supplier that was new to the proposed supply chain (ASK intTAG LLC). In a June 28, 2012, memorandum addressed to the CTEO, the Director of Product Security states that because all of the prospective prime and subcontractors were incumbents under the current eCover contract, site assessments were waived. The Director of Product Security cited a May 24, 2012, memorandum from the Managing Director of SID requesting permission to waive all pre-award surveys for incumbent suppliers as the basis for waiving security assessments for the incumbent suppliers. The Director of Product Security states in the June 28, 2012, memorandum that all sites had been subject to regular security assessments and no issues were found with any of the identified suppliers. On July 3, 2012, the CTEO wrote a memorandum to the CO stating that he concurred with the findings of the Director of Product Security.

No evidence existed that the CO approved the decision that the Director of Product Security made to waive the security assessments of the incumbent suppliers. The Director stated that all of the incumbent suppliers were subject to regular assessments. As noted in his June 28, 2012 memorandum Infineon was last visited more than 4 years prior in April 2008, Smartrac 2 years in June 2010, and Gemalto slightly less than 2 years in August 2010. The Director of Product Security stated in his June 28, 2012, memorandum that assessments of Infineon would be conducted later that summer [2012] which did occur. GPO officials stated that DOS performed the required background checks for personnel on the offeror's team. However, GPO could not provide any evidence that the background investigations were conducted.

GPO did not factor in the criminal record of Infineon in the security evaluation or the pre-award survey. On October 20, 2004, Infineon plead guilty in the U.S. District Court to participating in a conspiracy in the United States to eliminate competition by fixing the prices of Dynamic Random Access Memory. As a result of that plea, four Infineon executives agreed to pay fines and serve time in prison.

The contract solicitation, Attachment L, "Security Requirements," states, "The contractor shall have a reputation for integrity and lawful conduct in its business dealings." Section 3.1 of the MMAR requires that Government business must be

³ GPO Publication 805.33, Section 10.001, "Market Research, Policy," dated May 15, 2003.

conducted in a manner above reproach and that transactions relating to the expenditure of public funds require the highest degree of public trust and an impeccable standard of conduct. While we do not suggest that this prior record should have precluded Infineon from competition, considering Attachment L and MMAR Section 3.1 we believe that the issue should have been addressed, researched, and documented in the contract file.

The Managing Director of SID stated that GPO was aware of Infineon's previous plea but was not concerned because Infineon is a large organization and the division responsible for the crime was far removed from the division that works with GPO.

Pre-Award Survey

The contract solicitation required that the Government conduct a pre-award survey and site visit to validate the offeror's proposal or proposals, production processes, and its supply chain. GPO conducted a pre-award survey for only one integrator of the four remaining offerors (ASK intTAG LLC). The Managing Director of SID requested in a May 24, 2012, memorandum to the CO that GPO waive the need to conduct pre-award surveys for the other offerors and their integrators because they were current suppliers of GPO ePassport components and their production capacities, security arrangements, and product reliability were already validated by GPO. The GPO MMAR does allow such an action. Section 9.106.1 states that a pre-award survey is normally required only when the information on hand or readily available to the CO, including information from commercial sources, is not sufficient to make a determination regarding responsibility. However, no evidence was found in the contract file that would support that the CO approved this request.

Prescribed Steps for Acquisition Roles and Responsibilities Were Not Always Followed

GPO Internal Control Standards state, "Key duties and responsibilities in authorizing, processing, recording, and reviewing official agency transactions should be separated among individuals. Managers should exercise appropriate oversight to ensure that individuals do not exceed or abuse their assigned authorities." The eCover Acquisition Plan required that the TEB Chairperson was responsible for preparing a written summary of the results of the evaluation and ensuring panel members conducted a comprehensive evaluation of the proposals in an impartial and equitable manner. The Plan also required that the Chairperson transmit appropriate documentation to the CO. However, we found that key contract decisions were made by one individual—the CTEO—giving the appearance of a lack of involvement by other key acquisition team members. For example:

- On May 25, 2012, the CTEO, not the TEB Chairperson, wrote a memorandum to the CO informing the CO that one offeror failed testing and would no longer be considered for award. There was no further concurrence by the TEB or the AC and no acknowledgement by the CO.

- On July 3, 2012, the CTEO, not the TEB Chairperson, wrote a memorandum to the CO informing the CO that he concurred with the GPO Product Security Director’s decision not to conduct security assessments of the incumbent suppliers. There was no further concurrence by the TEB or AC and no acknowledgement by the CO.

In addition, GPO testing documentation supported that the CTEO, and not the TEB, was the evaluator throughout the testing process. During the evaluation of a test involving the flatness of the eCovers, the CTEO told us that he was the only person responsible for determining whether an offeror’s sample was suitable to move forward to the production floor for additional testing. For the one offeror eliminated during that phase, the CTEO was the only individual to sign the test form and submit documentation regarding suspending testing due to requirement failures. There was no evidence of other involvement or approval by the TEB or its Chairperson in this process as required.

Additionally, review of contract file documentation disclosed that the CTEO signed many of the test result forms, but the TEB Chairman did not certify the results as noted on the test result forms. Analysis of the 19 test criteria for Phase 4 revealed the following:

Table 3. Phase 4 Summary Testing Signatures and Certification

Test Sample	Criteria Test Results Signed	Criteria Test Results Certified
Product Test A	5 of 19	5 of 19
Product Test B	19 of 19	0 of 19
Product Test C	19 of 19	0 of 19
Product Test D	19 of 19	0 of 19

See Appendix D for details.

The GPO CTEO explained that GPO’s intention was that the TEB and its Chairperson would only be responsible for one proposal evaluation factor, “Technical Proposal Evaluation.” However, neither the eCover Acquisition Plan nor the contract file communicated that intention. We note that the CTEO was eventually appointed Contracting Officer’s Representative, but not until June 5, 2013, nearly ten months after contract award.

Inconsistencies Regarding the Disposition of Select Test Results

GPO did not always apply its testing procedures and testing results consistently to all offerors. The contract requirements state:

Prior to award, Offeror’s product samples will be evaluated in production and lab environments. Testing will occur in three stages and eight phases. Stage 1 testing consists of GPO technical and bindery tests. Stage 2 testing consists of DOS technical and personalization tests followed by Stage 3, Independent Lab Testing. There is a probability that not all Offerors will begin and/or finish testing. Testing will help

determine technical acceptability of the products by validating that they comply with all technical requirements and evaluation methods within the RFP to include but not limited to Section C, Section J, Independent Lab Testing, and Attachment T, Testing.

A product that passes all of the tests will be deemed technically acceptable for this evaluation factor. A product that does not pass a test will be deemed technically unacceptable for this evaluation factor and will not receive further consideration.

For one offeror (HID Global Corporation) under Stage 1 testing, test results revealed that the eCover sample products submitted failed the requirement for the inlay to be smooth and continuous from the edge of the cover to the hinge gap. Test results also revealed the same eCover sample products failed the requirement for the eCover to lie flat as shown below in Figure 1:

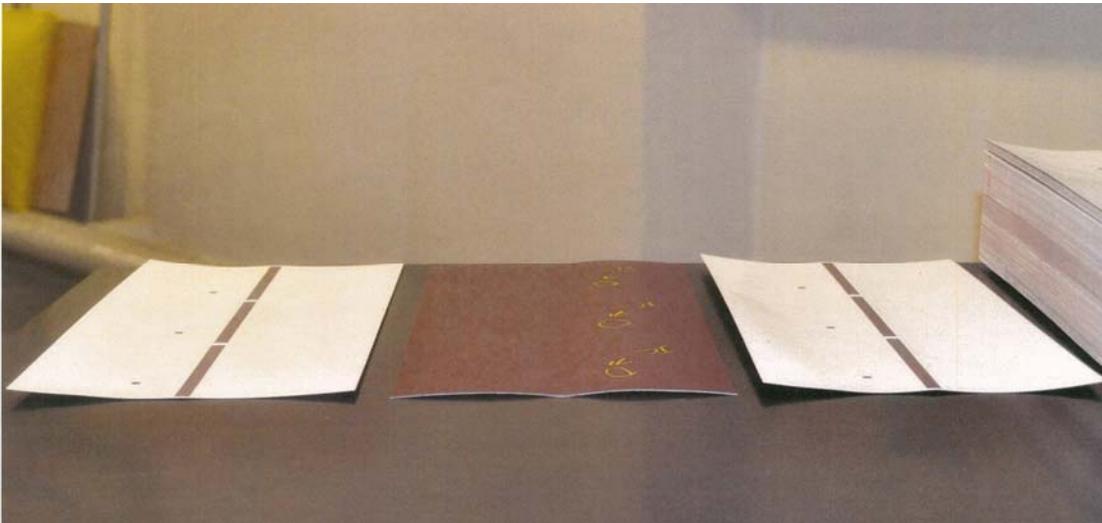


Figure 1: Example of eCover Sample That Failed Requirement

We obtained samples of the submitted eCovers and confirmed they did not lie flat and that the eCovers were not smooth and continuous from the edge of the cover to the hinge gap. For those samples, the testing was suspended and HID was notified that the proposal was not accepted for award because the product failed the testing requirements. HID's bid price was \$2.81 per eCover.

Under Stage 2 testing, DOS performed technical and personalization tests for the offeror's (Gemalto and Infineon) samples that passed GPO Stage 1 testing phases. DOS tests consisted of three phases, which were performed on two offerors, and four integrators that advanced to Stage 2. Our review of the test documents for Phase 6 of the Stage 2 testing disclosed that the remaining offerors and integrators all failed to meet one of the test criteria—C6.5.6—which states:

The time for reading the U.S. government Sample Dataset from transparent EF [Elementary File] shall be less than or equal to 3 seconds with BAC [Basic Access Control] activated.

Despite such a failure, none of the offers samples were deemed technically unacceptable for the evaluation factor as the solicitation required. Those offeror's bid prices were \$4.84 and \$5.26 per eCover respectively.⁴ GPO's CTEO stated that the 3-second read-time was never meant to be a pass/fail test requirement. However, that intention was not documented in the contract solicitation, which in fact stated that if an offeror failed one test, it should no longer be considered. No evidence existed for CO concurrence and approval of the CTEO's statement.

GPO's overall acquisition environment may leave GPO vulnerable to protests, may result in management being unable to assure contracts were in the best interest of the GPO. For example, in the case of the testing discrepancies noted above, the offeror with the highest bid price who proceeded to Stage 2 testing (Infineon) exceeded the bid price of the offeror that failed Stage 1 testing (HID) by \$2.45 per eCover. Applying that cost difference to Infineon's 6.4 million eCovers ordered by GPO in 2013 results in a cost difference of nearly \$15.7 million. Although we confirmed that HID's samples did not meet the solicitation's requirements, GPO, by not adequately documenting its testing actions, discrepancies, and deviations, could leave itself open to questioning this amount by outside parties.

In addition, the acquisition environment may allow or give the appearance that program officials can exert undue influence over the procurement process. We attribute the vulnerabilities and increased risks to insufficient involvement by the CO and insufficient oversight and monitoring of the eCover acquisition process.

Recommendation

We recommended the Director, Acquisition Services:

1. Ensure contracting officers are engaged in the acquisition process by monitoring key activities to ensure those activities follow GPO policy.

Management's Response. Concur. During the time of the audit, the GPO Office of Acquisition Services instituted monthly staff meetings with the entire staff that included supplemental training sessions on various topics relating to the duties of contracting officers/specialists. Acquisition Services will incorporate the recommendations and lessons learned from this audit in the supplemental training sessions.

Evaluation of Management's Response. Management's actions are responsive to the recommendation. The recommendation is closed.

⁴ Offerors submitted different bid prices per eCover based on various levels of production during the five-year contract period. The three eCover bid prices noted above are based on a production volume of 3 to 6 million eCovers annually, shipped to the GPO Washington DC production facility.

2. Ensure key procurement steps, decisions, and deviations are fully documented and reviewed.

Management's Response. Concur. The GPO Office of Acquisition Services has instituted management reviews for solicitations (to include review of the acquisition plan and source selection plan) \$150K and above prior to issuance. The review includes a review by General Counsel. In addition, a review policy is being drafted to cover all of the work in Acquisition Services. In addition, Acquisition Services is consistently adhering to the Contract Review Board process and is looking to improve the current process. It is anticipated that a revision to the CRB process will be proposed in FY15.

Evaluation of Management's Response. Management's actions are responsive to the recommendations. The recommendation is resolved but will remain open for reporting purposes pending completion of the planned actions.

3. Ensure that the roles and responsibilities for the members on large complex acquisitions are clearly defined and monitored, and

Management's Response. Concur. The Director of Acquisition Services stated that with the institution of management review prior to the release of a solicitation; contracting officers/specialists are now required to provide the acquisition plan, and source selection/evaluation plan along with the draft solicitation. This will serve as a measure to identify any inconsistencies and issues early in the process before issuance. Specifically, it will provide the opportunity to have a well-defined source selection process to include clearly outlining all participants' respective roles and responsibilities.

Evaluation of Management's Response. Management's actions are responsive to the recommendation. The recommendation is closed.

4. Provide training to ensure contracting officer proficiency of technology used to manufacture eCovers.

Management's Response. Concur. The GPO Office of Acquisition Services will coordinate with the SID Managing Director to develop an approach to educate Acquisition Services staff on the technology used to manufacture eCovers and identify other opportunities to increase staff proficiency.

Evaluation of Management's Response. Management's actions are responsive to the recommendations. The recommendation is resolved but will remain open for reporting purposes pending completion of the planned action.

Appendix A – Objectives, Scope, and Methodology

We performed fieldwork from May 2013 through May 2014 at the GPO Central Office in Washington, D.C. We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that will 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.

Objectives

Our objective was to evaluate the steps GPO took in procuring the U.S. passport eCovers. Our objective was also to review key factors GPO considered regarding the operating system and IC specifications required in the solicitation.

Scope and Methodology

To substantiate the complaint allegations we read the complaint, read a detailed response to the complaint allegations that was prepared by SID and submitted to OIG, read transcripts of the award protest hearings, interviewed personnel representing the company that filed the protest, interviewed personnel from SID, and requested and examined evidence to corroborate SID's response to the allegations.

To determine if the contract was administered in accordance with GPO policies and contract requirements, we reviewed applicable MMAR requirements, the eCover Acquisition Plan, the contract solicitation, and met with GPO officials to ensure an adequate understanding of GPO's actions taken during the award process and the basis for those actions. We then examined the contract file to determine whether there was adequate evidence to support that GPO followed all processes and requirements defined in the MMAR, eCover Acquisition Plan, and the contract.

Management Controls Reviewed

We determined that the following internal controls were relevant to our audit objective:

Program Operations – Policies and procedures GPO management implemented to reasonably ensure that processes met GPO's objectives.

Compliance with Laws and Regulations – Policies and procedures management implemented that reasonably ensure resource use is consistent with laws and regulations.

The details of our examination of management controls, the results of our examination, and noted management control deficiencies are contained in the report narrative. Implementing the recommendations for this audit should improve those management control deficiencies.

Computer-generated data

We did not rely on any computer-processed data from any GPO computer system.

Appendix B – Acronyms and Abbreviations

AC	GPO eCover Contract Advisory Council
CO	Contracting Officer
COR	Contracting Officer Representatives
CTEO	Chief Technology Evaluation Officer
DOS	Department of State
eCover	Electronic Passport Cover
ePassport	Electronic Passport
GAO	Government Accountability Office
GPO	Government Printing Office
IC	Integrated Circuit
ICAO	International Civil Aviation Organization
LDS	Logical Data Structure
MMAR	Materials Management Acquisition Regulation
OIG	Office of Inspector General
OMB	Office of Management and Budget
OS	Operating System
PUPI	Pseudo Unique Identifier
RF	Radio Frequency
RFP	Request for Proposal
RFQ	Request for Quote
SID	Security and Intelligent Documents
TEB	Technical Evaluation Board
UID	Unique Identifier

Appendix C – Management’s Response



A handwritten signature in blue ink, appearing to read 'Damon McClure', written over the GPO logo.

Memorandum

July 11, 2014

From: Damon McClure, Director, Acquisition Services

To: Michael Raponi, Inspector General, Office of the Inspector General

Subj: Management’s Response to the Draft IG Audit Report #14-14 - dated May 30th 2014 titled Acquisition of U.S. Passport eCovers

Thank you for the opportunity to respond to the draft IG Audit Report #14-14 - dated May 30th, 2014 - titled Acquisition of U.S. eCovers. The following response is provided for your reference and incorporates the response from the SID Managing Director:

On page 1 of the Draft Report 14-14, two key elements of the complaint were highlighted:

- 1) *“A key element of the complaint alleged that GPO mandated the use of an electronic passport chip operating system (OS) that was available to only Infineon, thereby restricting competition.”*

Response:

SC Square OS was an explicit and well documented requirement by the customer – the Department of State drove this as a requirement. SC Square made the Apollo OS and associated software development kits available to all chip manufacturers and industry integrators in an open and fair manner. The fact that the chip manufacturer, NXP, integrated the Apollo OS onto their NXP Integrated Circuit (IC) and it appeared in several of the offerings is evidence of that fact. Both the Infineon IC and the NXP IC sample submissions utilized the SC Square Apollo OS showing that the OS was made available with open and fair access. GPO did not conduct a sole source procurement rather multiple sources were considered. There were 15 sample submissions offered that were evaluated and competed (of the 15 samples submitted, 7 submissions utilizing Infineon ICs and 8 submissions utilized NXP ICs). Both the Infineon IC and the NXP IC were designed with the SC Square Apollo OS and were part of the sample submissions which advanced to the final evaluation stage. The alleged complaint is inaccurate in that more than one chip supplier successfully integrated and offered an IC with the SC Square Apollo OS in accordance with the RFP.

- 2) *“A second key element of the complaint alleged that GPO ignored a known security weakness associated with the Infineon-manufactured integrated circuit (IC), allowing Infineon to compete for the contract award.”*

Response:

The Infineon SLE66 family of ICs consists of many different designs and levels of security features and systems. The Infineon SLE66 IC presently used in the U.S. government’s electronic passport has not been compromised and has no known vulnerabilities. The Infineon SLE66 IC used in the U.S. electronic passport is an IC that is uniquely designed with security features not found in the rest of the Infineon family of SLE66 ICs – media stories of a ‘hacked chip’ do not pertain to the SLE66 IC used in the U.S. electronic passport.

- There is a strong and successful track record evidenced with over 40 million electronic passports manufactured using the Infineon SLE66 IC.

- There is no evidence that the uniquely designed Infineon SLE66 IC used in the U.S. electronic passport has been hacked. The anonymous complaint details media stories of hacked SLE66 ICs that are not the same ICs uniquely designed and employed in the production of U.S. electronic passport.
- The SC Square Apollo OS has a strong and successful track record as it has been employed in the over 40 million electronic passports manufactured by GPO since 2005.
- The SC Square Apollo OS is Common Criteria Certified to Evaluation Assurance Level (EAL) 5+.
- During the electronic passport program, SC Square's Apollo OS was improved, upgraded or certified on a regular basis to ensure that it was continuously capable of meeting the technology needs of the U.S.'s electronic passport program.

On page 8 of the Draft Audit report, the following was statement was made:

- 3) *We reviewed documents and were told that the Infineon IC (SLE 78) currently used in U.S. passports has not been compromised. This assertion is based on any relevant knowledge and available information. In addition, GPO has manufactured millions of passports using this IC (SLE 78) and is unaware of any known security related issues.*

Response:

It is not clear what relevance this statement has in the Draft report. The Infineon SLE78 chip has nothing to do with the procurement and was not part of any of the 15 samples provided by any of the seven Offerors. The new contracts were awarded without any association with the Infineon family of SLE78 chips.

The U.S passport supply chain is subjected to stringent and continuous audits by the GPO's Vendor Secure Supply Chain Audit Program (VSAP). A formal and documented audit program managed by the GPO's Security Department (in association with DOS Diplomatic Security), the VSAP audits ensure compliance with security, accountability, quality and continuity of operations. All supply chain company executives, principles and members of senior management are vetted with a background check by DOS Diplomatic Security and continuous on-site audits are conducted based on a quantifiable risk matrix and assessment.

On page 2 (and pages 12/13) of the Draft Audit report, the following was statement was made:

- 4) *We attribute the vulnerabilities and increased risks to insufficient involvement by the CO and insufficient oversight and monitoring of the e-Cover acquisition process. Review of contract file documentation disclosed that the CTEO signed many of the test result forms, but the TEB Chairman did not certify the results as noted on the test result forms.*

My Response:

While GPO management agrees with the recommendation to ensure contracting officers are engaged in the acquisition process by monitoring key activities to ensure those activities follow GPO policy, we do not agree that there were vulnerabilities and increased risks due to insufficient involvement by the CO and insufficient oversight and monitoring of the e-Cover acquisition process as it relates to the participation of the CTEO.

The inclusion of the CTEO in the evaluation process denotes additional oversight and monitoring by having a technical subject matter expert involved rather than insufficient oversight and

monitoring. By including the CTEO, GPO was ensuring that the evaluation was accurate. However, GPO Management agrees that the appearance suggests that the TEB was not involved but in reality this was not the case. GPO Management agrees that the acquisition plan and more importantly the source selection plan needs to be fully documented and reflect all participants' roles in the source selection process. Every member of the multi-agency team clearly understood that the Technical Evaluation Board (TEB) Chairman's role. There was never an intentional circumvention of this role. The CTEO never worked independently, alone or in a vacuum. Although memos and written tests results were submitted to the CO by individuals such as the CTEO and Managing Director of SID with only "one signature", the work behind the memos and test results was performed by many individuals from varying organizations with the knowledge of the CO. As we look to improve our visibility and procurement documentation and processes in the future, we will ensure that the acquisition plan and more importantly the source selection plan fully document and reflect all participants' roles in the source selection process.

On page 10, Table 2 (Past Performance) of the Draft Audit report, the following statement was made:

- 5) *We examined the contract files and although we found completed questionnaires we found no evidence where GPO attempted to acquire past performance.*

Response:

We find this statement to be somewhat conflicting. The presence of the completed questionnaires in the file is evidence that GPO attempted to acquire past performance. The CO relied upon the information provided in the questionnaires for the evaluation of this factor. GPO concurs that any additional information relied upon and used to evaluate past performance should be sufficiently documented. After 5-6 years of successfully supplying the U.S. passport program with quality products, GPO and the CO in particular had experience with each company's past performance for several years. The Draft Report could certainly identify a lack of documentation (ex: a CO's memo to the file) as something to improve in the future but, the report falsely implies that the GPO moved forward with the procurement without knowledge of the past performance of the companies under consideration.

Regarding the Audit Recommendations:

Overall, the following responses are provided for your reference and address the recommendations that were contained in the report:

Recommendation 1: *Ensure contracting officers are engaged in the acquisition process by monitoring key activities to ensure those activities follow GPO policy.*

GPO management concurs with this recommendation. During the time of the audit, Acquisition Services instituted monthly staff meetings with the entire staff that includes supplemental training sessions on various topics relating to the duties of contracting officers/specialists. Acquisition Services will incorporate the recommendations and lessons learned from this audit in the supplemental training sessions.

Recommendation 2: *Ensure key procurement steps, decisions, and deviations are fully documented and reviewed.*

GPO management concurs with this recommendation. Acquisition Services has instituted management reviews for solicitations (to include review of the acquisition plan and source selection plan) \$150K and above prior to issuance. The review includes a review by General Counsel. In addition, a review policy is being drafted to cover all of the work in Acquisition Services. In addition, Acquisition Services is consistently adhering to the Contract Review Board process and is looking to improve the current process. It is anticipated that a revision to the CRB process will be proposed in FY15.

Recommendation 3: *Ensure that the roles and responsibilities for the members on large complex acquisitions are clearly defined and monitored.*

GPO management concurs with this recommendation. With the institution of management review prior to the release of a solicitation, contracting officers/specialists are now required to provide the acquisition plan, and source selection/evaluation plan along with the draft solicitation. This will serve as a measure to identify any inconsistencies and issues early in the process before issuance. Specifically, it will provide the opportunity to have a well-defined source selection process to include clearly outlining all participants' respective roles and responsibilities.

Recommendation 4: *Provide training to ensure contracting officer proficiency of technology used to manufacture eCovers.*

GPO management concurs with this recommendation. Acquisition Services will coordinate with the SID Managing Director to develop an approach to educate Acquisition Services staff on the technology used to manufacture eCovers and identify other opportunities to increase staff proficiency.

General Comments about the Audit:

This audit reviewed a major procurement action conducted by the GPO to identify and select multiple commercial firms to provide a very vital component (cover material embedded with an electronic chip and antenna array) used in the production of the U.S. electronic passport. This multi-agency effort included representatives from agencies such as GPO, DOS, and DHS and the overall project lasted more than three years (where more than a year was spent tightly defining the product specifications and performance parameters). The acquisition represents one of the most complex, technical and high dollar value procurement actions undertaken by the GPO in modern times.

This procurement action had close oversight and direct involvement from representatives of the GPO's Office of Acquisition, the GPO's Office of General Counsel, the GPO's Security and Intelligent Documents (SID) business unit, the DOS's Bureau of Passport Services, the DHS's Fraudulent Document Laboratory and the DHS's Customs and Border Protection (CBP) agency. Given the number of independent and active participants throughout every phase of this process, the allegation that the GPO or any individual person could succeed in purposefully steering the procurement toward a particular vendor is preposterous. As the allegation was derived from an anonymous and unsigned letter to the OIG, it is not surprising that the OIG was not able to substantiate the complaint.

Appendix D – Phase 4 Test Program Summary

Criteria	Description	Product Test A		Product Test B		Product Test C		Product Test D	
		Signed	Certified	Signed	Certified	Signed	Certified	Signed	Certified
C4.1.2	The eCover shall be compatible with the GPO manufacturing process.	Y	Y	Y	N	Y	N	Y	N
C5.1.7	The IC/Antenna assembly shall remain fully functional after exposure to mechanical stresses during ePassport manufacturing and personalization processes and throughout the warranty period of 3 years, see section C3.	Y	Y	Y	N	Y	N	Y	N
C5.1.8	The eCover shall stay intact without any layer separation during the GPO and DOS production process and throughout the warranty period of 12 years, see section C3.	Y	Y	Y	N	Y	N	Y	N
C5.1.12	The 3-up eCover sheet shall be fabricated such that the completed ePassport will lie flat with the front cover opening less than five degrees when closed.	Y	Y	Y	N	Y	N	Y	N
C5.1.14	The eCover shall survive stresses during the manufacturing and personalization processes including, but not limited to, bending, stamping, torsion, and pressure.	Y	Y	Y	N	Y	N	Y	N
C5.1.15	The eCover shall survive temperatures to which it will be exposed during the manufacturing and personalization processes.	N	N	Y	N	Y	N	Y	N
C6.5.3	UID/PUPI GET DATA read time shall be less than or equal to 50 milliseconds.	N	N	Y	N	Y	N	Y	N
C6.6.1	During the pre-personalization process, the IC shall support the erasing or deleting of specific data or all data.	N	N	Y	N	Y	N	Y	N

Appendix D – Phase 4 Test Program Summary

Criteria	Description	Product Test A		Product Test B		Product Test C		Product Test D	
		Signed	Certified	Signed	Certified	Signed	Certified	Signed	Certified
C6.8.1	The LDS Library shall confirm to specifications listed in ICAO 9303 Part 1, Volume 2.	N	N	Y	N	Y	N	Y	N
C6.10.1	The Apollo OS from SCsquare Ltd. is a native operating system used in the IC. The OS characteristic, functionalities, and security shall be at a minimum version V3.15.	N	N	Y	N	Y	N	Y	N
C6.13.1.1	Unique IC shall be obtainable by reading the UID on Type A chips and/or PUPI on Type B chips.	N	N	Y	N	Y	N	Y	N
C7.1.1	An electronic manifest using both XML and CSV file formats in accordance with the specifications in Section J-Attachment I: Incoming eCover Vendor Manifest shall be supplied for the incoming eCovers.	N	N	Y	N	Y	N	Y	N
C8.3.1	Transport Keys shall be delivered electronically in both XML [extensible Markup Language] and CSV [Comma Separated Values] file format, see Section J-Attachment K: Transport Key Specifications.	N	N	Y	N	Y	N	Y	N
C11.1.1.2	The eCover shall not change or alter the existing GPO or DOS manufacturing processes.	N	N	Y	N	Y	N	Y	N
C11.1.3.2c	The Contractor may supply X-eCovers as long as the following criteria are met: Only one eCover per 3-up eCover sheet may be an X-eCover. The Government will not accept a 3-up eCover sheet with two or more non-functioning eCovers.	N	N	Y	N	Y	N	Y	N

Appendix D – Phase 4 Test Program Summary

Criteria	Description	Product Test A		Product Test B		Product Test C		Product Test D	
		Signed	Certified	Signed	Certified	Signed	Certified	Signed	Certified
C11.1.3.2.d	The Contractor may supply X-eCovers as long as the following criteria are met: The X-eCovers shall not be bundled together instead they shall be scattered throughout the shipment.	N	N	Y	N	Y	N	Y	N
C11.1.3.2.e	The Contractor may supply X-eCovers as long as the following criteria are met: No more than 2 percent of the individual order shall be marked as an X-eCover. If more than 2 percent are delivered the Contractor will receive a cure notice.	N	N	Y	N	Y	N	Y	N
C11.1.3.2.f	The Contractor may supply X-eCovers as long as the following criteria are met: The Contractor shall supply the exact number of fully functional eCovers specified in the order, but additional eCovers to make up for the X-eCovers is required at the time of delivery	N	N	Y	N	Y	N	Y	N
Section J, Attach. G	To support inventory management needs, prior to locking the document, the UID MUST be fixed.	N	N	Y	N	Y	N	Y	N

Appendix E – Report Distribution

Public Printer

Deputy Public Printer

General Counsel

Chief of Staff

Managing Director, Security and Intelligent Documents

Major Contributors to the Report

Karl Allen – Lead Auditor