



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Review of the United States Capitol Police Training Services Bureau

Investigative Number 2022-I-0003

April 2022

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**UNITED STATES CAPITOL POLICE
WASHINGTON, DC 20003**

OFFICE OF INSPECTOR GENERAL

PREFACE

The Office of Inspector General (OIG) prepared this report pursuant to the Inspector General Act of 1978, as amended. It is one of a series of audits, reviews, and investigative and special reports OIG prepares periodically as part of its oversight responsibility with respect to the United States Capitol Police (USCP) to identify and prevent fraud, waste, abuse, and mismanagement.

This report is the result of an assessment of the strengths and weaknesses of the office or function under review. Our work was based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

We developed our recommendations based on the best knowledge available to OIG and discussed the draft findings with those responsible for implementation. It is my hope that the recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to those contributing to the preparation of this report.

Ronald Gregory

Ronald Gregory
Acting Inspector General

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Abbreviations and Acronyms

Chief Administrative Officer	CAO
Civil Service Retirement System	CSRS
Commission on Accreditation for Law Enforcement Agencies	CALEA
Containment and Emergency Response Team	CERT
Dignitary Protection Division	DPD
Department Strategic Plan	DSP
Federal Bureau of Investigation	FBI
Federal Employee Retirement System	FERS
Federal Protective Service	FPS
Federal Law Enforcement Training Accreditation	FLETA
Federal Law Enforcement Training Centers	FLETC
Government Accountability Office	GAO
Office of Information Systems	OIS
Office of Inspector General	OIG
Property and Asset Management Division	PAMD
Rowley Training Center	RTC
Special Agent In Charge	SAIC
Temporary Duty	TDY
Training Services Bureau	TSB
United States Capitol Police	USCP or Department
United States Secret Service	USSS
Veterans Affairs Law Enforcement Training Center	VA LETC

EXECUTIVE SUMMARY

The United States Capitol Police (USCP or Department) Training Services Bureau (TSB) is one of eleven organizational units reporting to the Chief Administrative Officer (CAO). TSB is responsible for preparing Department employees to act decisively and correctly in a broad spectrum of situations, for improving overall productivity and effectiveness, and for fostering cooperation and unity of purpose. It is also responsible for planning, developing, and implementing Department-wide training programs.

In accordance with our *Annual Performance Plan Fiscal Year 2022*, the Office of Inspector General (OIG) conducted a review of TSB. Our objective was to determine if (1) the Department's organizational structure and processes for its training program were the most efficient and effective and (2) the Department complied with selected policies, procedures, applicable laws, regulations, guidance, and best practices. Our scope included the TSB organizational structure, processes, and operations.

Changes to the organizational structure would improve the efficiency and effectiveness of the Department's training processes. The Department's decentralized training structure is the origin of many training deficiencies that hinder objectives stated in the *USCP Department Strategic Plan 2021-2025*, including:

- Train and develop sworn and civilian personnel to ensure a ready, able, and professional USCP workforce
- Enhance internal controls, transparency, and adherence to best practices to support efficient use of Department fiscal resources

The Department's decentralized training structure created a lack of TSB oversight for in-service training and a lack of TSB involvement in training research and development. Additionally, the Department did not have a sufficient number of training instructors or adequate training space to effectively and efficiently complete entry-level and in-service classes at the USCP training facility at Cheltenham, Maryland.

The Department did not always adhere to training-related guidance and its training policies and procedures were not consistent with the best practices of other Federal law enforcement agencies. USCP's accreditation process did not comply with those of its partner agencies.

Furthermore, TSB should have increased oversight of cyber security and online training for compliance with guidance. See Appendix A for a complete list of recommendations.

On April 11, 2022, we provided a draft report to the Department for comment and attached the response in its entirety in Appendix B.

BACKGROUND

The United States Capitol Police (USCP or Department) Training Services Bureau (TSB) is one of eleven organizational units reporting to the Chief Administrative Officer (CAO). TSB is responsible for preparing Department employees to act decisively and correctly in a broad spectrum of situations, for improving overall productivity and effectiveness, and for fostering cooperation and unity of purpose. It is also responsible for planning, developing, and implementing Department-wide training programs. The Bureau is divided into four Divisions: Entry-Level Training, In-Service Training, Physical Skills, and Federal Law Enforcement Training Centers (FLETC) Liaison.

TSB supports the USCP mission through human capital and development, providing a central repository for all training records, and coordinating the training to create and sustain a vigorous and motivated workforce.

New recruits for USCP report for a 2-week pre-training course at the Department training facilities at Cheltenham, Maryland prior to 12 weeks of training at the FLETC in Glynnco, Georgia. TSB subsequently conducts an additional 12 weeks of USCP-specific training. Once training is complete, Assistant Chiefs of Police will assign graduates to specific areas.

According to USCP Bulletin 20.113, APEX Learning Goes Live; User Guide Now Available, published on September 29, 2020, a computerized training system called APEX "replaced the legacy Training Management System (TMS) and it consolidates all of your training tasks – scheduling, reporting, and tracking – in one convenient place with 24/7 access." The Bulletin also states that TMS would be "frozen/disabled on October 1, 2020 and training records will then be migrated from the TMS to APEX."

APEX is divided into three modules: learning, recruitment, and performance. The APEX Learning section focuses on training where administrators and training coordinators can assign and record training. In addition, end users can view training records and assigned training. TSB and other elements provide in-service training and continuing professional education to employees to help those employees maintain the skills necessary for performing assigned duties and complying with certification requirements. USCP follows The Commission on Accreditation for Law Enforcement Agencies (CALEA) standards on training and career development.

The *USCP Department Strategic Plan 2021-2025*, or DSP, details the forward-focused goals and objectives USCP will undertake over the next 5 years to meet mission demands. The DSP states the following about training:

Objective 1.4 - Train and Develop Sworn and Civilian Personnel To ensure a ready, able, and professional USCP workforce enables the administration of robust training and employee development activities for the entire workforce to close competency gaps, ensure leadership excellence, prepare employees for professional growth, and meet mission demands now and into the future. Key to Objective 1.4 is ensuring the Department invests appropriately in identifying, delivering, and managing the training that will position the USCP to meet future strategic mission requirements, including building a strong cadre of Department leaders. The activities and initiatives related to Objective 1.4 are detailed in the Human Capital Strategic Plan and include:

- 1.4.1 Establish professional development training based on rank and or position that includes a diversity, equity, and inclusion curriculum. (HSCP 4.1)
- 1.4.2 Establish employee annual training plans that include Department training, professional development, and leadership development, as appropriate. (HSCP 4.2)
- 1.4.3 Identify, facilitate, and track Department bureau- and office-specific mandatory and discretionary training requirements. (HSCP 4.3)
- 1.4.4 Streamline and modernize the administration and deployment of all workforce training (sworn and civilian) under the Training Services Bureau. (HSCP 4.4)

OBJECTIVE, SCOPE, AND METHODOLOGY

In accordance with our *Annual Performance Plan Fiscal Year 2022*, the USCP OIG conducted a review of TSB. Our objective was to determine if (1) the Department's organizational structure and processes for its training program were the most efficient and effective and (2) the Department complied with selected policies, procedures, applicable laws, regulations, guidance, and best practices. Our scope included the TSB organizational structure, processes, and operations.

To accomplish our objectives, we interviewed Department officials, training personnel, and partner agency representatives. To research best practices, OIG conducted site visits to the U.S. Secret Service (USSS) Rowley Training Center (RTC) in Laurel, Maryland and the Federal Bureau of Investigation's (FBI) Training Academy at Quantico, Virginia. Additionally, we interviewed training personnel from the Department of Veterans Affairs (VA) Law Enforcement Training Center in Little Rock, Arkansas and Federal Protective Service (FPS) in Washington, D.C. concerning their best practices related to training. We also reviewed policies and procedures related to training. Furthermore, we reviewed Government Accountability Office (GAO) guidance.

Although the primary focus of this review was TSB, OIG believed it appropriate to capture a broad view of the amount and type of training that takes place outside the scope of TSB. To obtain an accurate picture of the type and amount of training that takes place department-wide, OIG created an informal questionnaire and distributed it to a number of disparate units within the department. OIG created the questionnaire to gain insight into other training because no one source within the Department could identify all of the training activity. The questionnaire identifies themes more in detail throughout the report. OIG sent the questionnaire to 37 organizational units within the Department. The questionnaire consisted of 31 essay questions. OIG's analysis revealed training patterns throughout the Department.

OIG conducted this assessment in Washington, D.C., from December 2021 through April 2022. We did not conduct an audit, the objective of which would be the expression of an opinion on Department programs. Accordingly, we did not express such an opinion. Had we performed additional procedures, other issues might have come to our attention that we would have reported. This report is intended solely for the information and use of the Department, the Capitol Police Board (Board), and the USCP Oversight Committees and should not be used by anyone other than the specified parties.

RESULTS

USCP's organizational training structure lacked efficiency and effectiveness. The Department's decentralized training structure is the origin of many training deficiencies that hindered objectives stated in the DSP, which are:

- Train and develop sworn and civilian personnel to ensure a ready, able, and professional USCP workforce
- Enhance internal controls, transparency, and adherence to best practices to support efficient use of Department fiscal resources

The Department did not have a sufficient number of training instructors or adequate training space for effectively and efficiently completing Entry-Level and In-Service classes at the USCP training facility in Cheltenham. The Department also did not always adhere to training-related guidance and its training policies and procedures were not consistent with the best practices of other Federal law enforcement agencies.

Lack of Efficient and Effective Training Structure

Overall, TSB did not properly integrate into the Department's organizational structure, which allowed inefficiencies to occur and diminished the Department's readiness and training mission.

GAO Standards for Internal Control in the Federal Government; Organizational Structure, GAO-14-704G, dated September 2014, state:

Management develops an organizational structure with an understanding of the overall responsibilities, and assigns these responsibilities to discrete units to enable the organization to operate in an efficient and effective manner, comply with applicable laws and regulations, and reliably report quality information. Based on the nature of the assigned responsibility, management chooses the type and number of discrete units, such as divisions, offices, and related subunits.

As part of establishing an organizational structure, management considers how units interact in order to fulfill their overall responsibilities. Management establishes reporting lines within an organizational structure so that units can communicate the quality information necessary for each unit to fulfill its overall responsibilities. Reporting lines are defined at all levels of the organization and provide methods of communication that can flow down, across, up, and around the structure. Management also considers the entity's overall responsibilities to external stakeholders and

establishes reporting lines that allow the entity to both communicate and receive information from external stakeholders.

An undated DSP states intentions to “Streamline and modernize the administration and deployment of all workforce training (sworn and civilian) under the Training Services Bureau” as one of its objectives, but unlike our Federal law enforcement partners, the Department's current structure is decentralized. The decentralized training structure of the Department created a lack of TSB oversight for in-service training and a lack of TSB involvement in training research and development.

Organization Structure

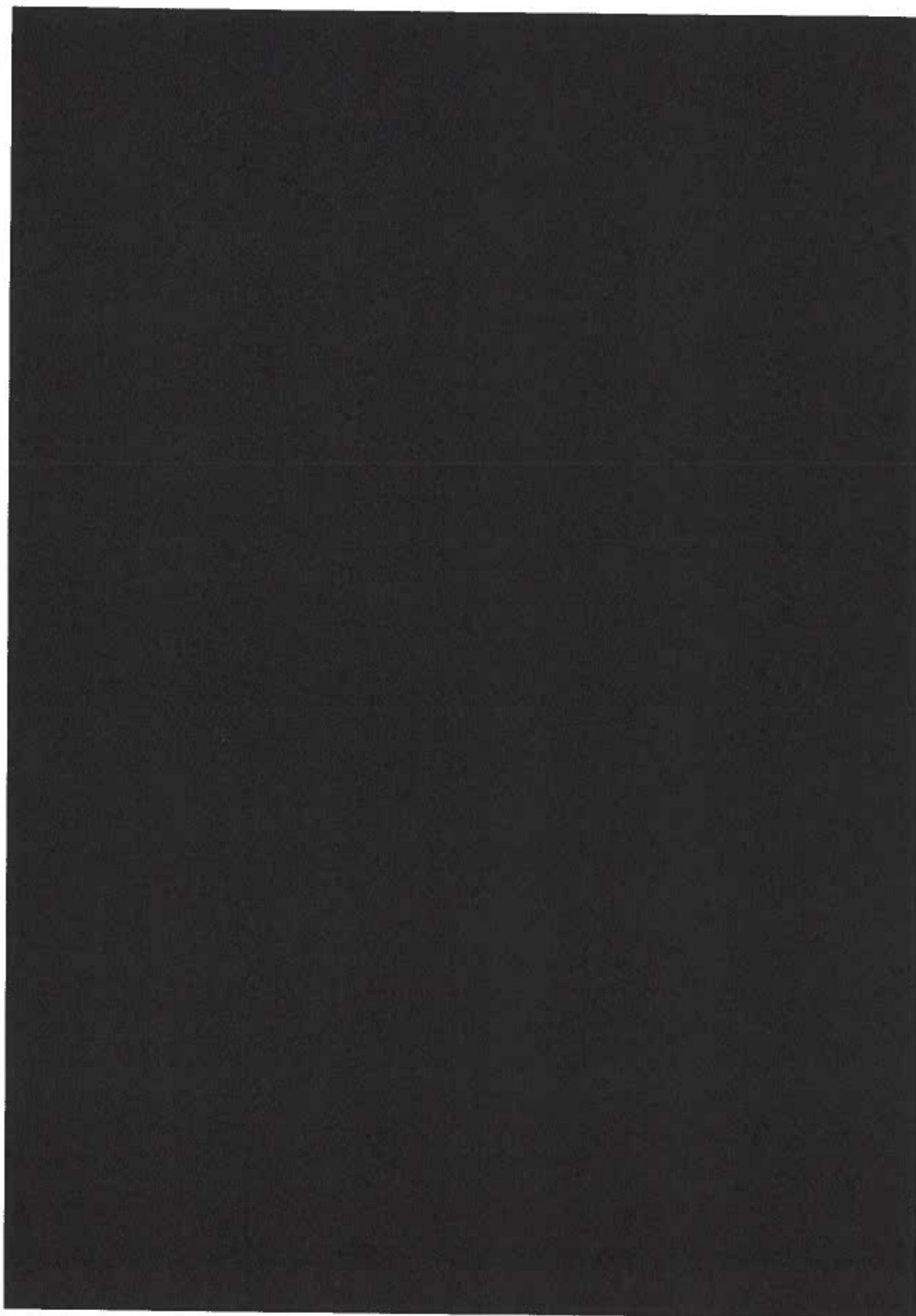
The FBI's training academy organizational chart (Exhibit 1) clearly defines multiple sections such as the Curriculum Management and Instruction sections that are responsible for training-related activity agency-wide. Exhibit 1 also displays a strong presence of oversight from multiple leadership positions for each area of responsibility.

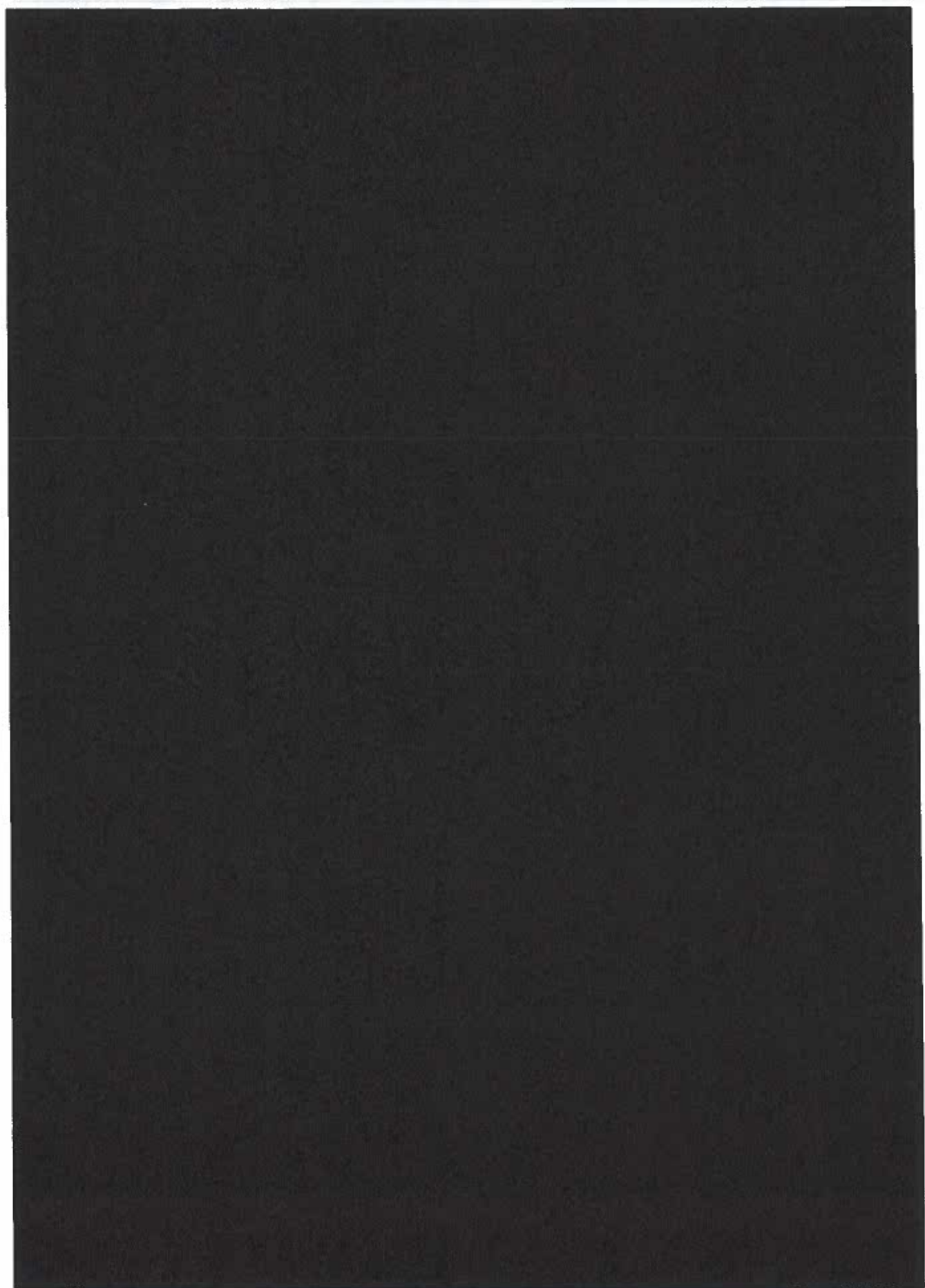
USSS has a similar training structure to that of the FBI in that all training-related activity is conducted through its respective training divisions. The Special Agent in Charge (SAIC) of the USSS RTC stated that RTC is used for the entirety of an officer, employee, and agent's career, and that RTC provides basic training, advanced training, and in-service training. Exhibit 2 reinforces the concept by displaying training-related activity under the responsibility of the RTC.

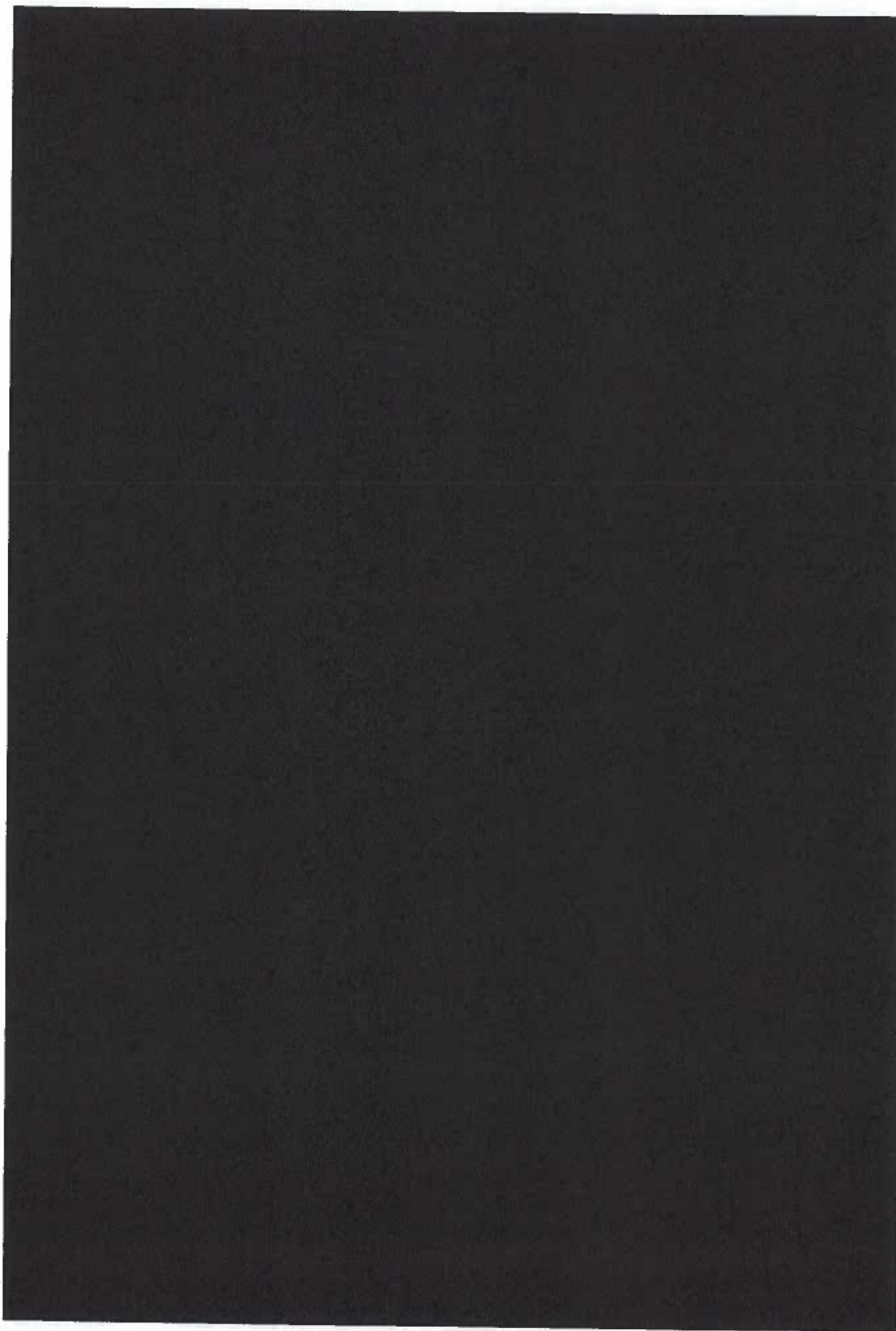
The Department's current training structure departs from best practices set by other agencies, such as implementing a centralized unit as the training authority for all of its training-related activity. Exhibit 3, TSB's organizational chart, displays the main sections for TSB, which includes In-Service Training, Physical Skills Division, FLETC Liaison, and Entry-level Training.

Comparing the three organizational charts, USCP did not have a robust training unit such as that of the FBI and USSS. Although the FBI and USSS's budget and size largely exceeds USCP, their training models should be viewed as a best practice. The FBI and USSS training sections have a strong leadership presence with its cadre, which ultimately provides all levels of training from entry to advance.

Although the Department's organization chart shows that TSB reports to the office of the CAO, operationally the majority of TSB is under the direction of other Department leaders, as one Department official reported. The cause of the issue stems from having civilian leaders supervising sworn personnel. According to the Department official, civilian officials are typically questioned by USCP executive-level officials about their leadership abilities and law enforcement experience because as civilians they never formally served as sworn officers in the police force like rank and file officers. Additionally, TSB's commander position is comprised of a sworn employee. Over time, that individual is reassigned to another role or promoted, which also causes a break in the continuity of leadership in TSB.







Lack of TSB Oversight for In-service Training

A common theme among the Department's law enforcement partners is a centralized training structure where controls are in place that are designed to optimize oversight and accountability for the overall training mission. Without proper controls, training within a unit may alter objectivity and result in a diminished level of instruction and integrity of individual assessments.

Comparing the Department's training structure to Federal partners, it has been noted that any training-related course and instruction that includes specialized training is overseen by their respective training division. That type of structure is an example of a proper control environment that will ensure training is completed at an intended standard and individuals are assessed fairly.

Like other Federal partners, the FBI's training division is responsible for all aspects of training for the agency, which may include leadership, tactical skills, and instructor development training. As for USSS personnel, training within its agency is standardized among instructors with experience in their related field to ensure the instruction is properly executed, resulting in fair individual evaluations.

The Department did not have the proper training structure for optimizing oversight and accountability for its overall training mission. Although TSB is technically responsible for training, it primarily focuses on recruit officer training. As a result, TSB has limited involvement with in-service training. Our questionnaire disclosed that 85 percent of respondents having completed specialized training that had minimal, if any, direction from TSB. According to several respondents, unit trainers created courses, which were approved by the unit commander and in most cases, there was no input, guidance, or oversight from TSB. Many of the completed questionnaires stated that units created training based on conference attendance, other agency training courses, or internal needs. Some of the respondents stated that course development was reviewed internally by potential students and critiqued prior to unit commander approval, yet there was little or no oversight by TSB.

A previous flash report, Investigative Number 2021-I-0003-G, *Review of the Events Surrounding the January 6, 2021, Takeover of the U.S. Capitol Flash Report: Dignitary Protection Division and Human Capital*, dated October 2021, reported:

DPD's Basic Agent Training Program is self-managed and comprised of instructors with additional responsibilities as active protective agents. According to a former Secret Service Protective Detail Training Instructor, best practices for specialized training programs include an unbiased separate unit to conduct a training program that maintains a dedicated training cadre. Additionally, an audit the Joint and External Training Section and Protective Detail Training Section of the USSS recommended a dedicated training staff to coordinate and instruct.

Individual Department organizational units are responsible for their specialized or selected training with little or no involvement from TSB. TSB is responsible for approving lesson plans

and other administrative duties relating to unit specific training, but ultimately is not involved in monitoring the actual training. An organizational unit within the Department may have specialized instructors responsible for training only as a collateral duty while they continue to perform operationally.

Chain of Command Deficiencies

Another issue with the Department's overall organizational structure for training is a circumvention of authority over TSB. A Department official stated there were several deficiencies involving TSB's organizational structure, training practices, and compliance with Department training policies. The Department official suggested that deficiencies were:

- Non-compliance with training directives
- Inefficient use of training resources
- Improper implementation and questionable acquisition of training equipment

A consequence of the Department's organization structure issue is directly related to possible non-compliance with training directives. USCP Directive 2060.001, *Requests for External Training*, dated May 28, 2012, states,

[REDACTED]

According to the statement from the Department official, TSB approved external training at the request of other Department leaders, which in the end resulted in superseding TSB's decision-making authority. By diverting the chain of command, external training was approved that may not align with the Department's mission. An example of this involved the members of the Containment Emergency Response Team (CERT) attending helicopter rappelling training from an external vendor. The Department does not own any aircraft, and the training does not align with the Department's core mission. In addition, OIG issued Management Advisory Report, *Containment Emergency Response Team Contractor*, May 26, 2021, describing questionable content on a vendor's website. The vendor was contracted to conduct training for CERT.

Another issue related to TSB's organizational structure pertained to the lack of approval of training plans. USCP Directive 2062.002, *In-Service Training*, dated September 30, 2020, states,

[REDACTED]

Some Department officials stated that TSB lacked involvement in USCP's recent purchase of four new VirTra Virtual Training Systems. The systems are judgmental shooting simulators designed to train officers to make critical decisions in uncertain, stressful, and rapidly evolving situations. Procurement documentation stated market research justification was completed by an official assigned to DPD. Because the acquisition related to the procurement of a training product, it should have been coordinated and completed by TSB rather than DPD. Additionally, according to TSB personnel, TSB did not have a lesson plan in place for the VirTra simulators but would send instructors to train with the vendor once the system was in place. A former USSS training supervisor stated as a best practice, an agency's training entity should be directly involved in the research and evaluations of potential training concepts and equipment.

Conclusion

The Department's decentralized training structure is the origin of many deficiencies involving training within USCP. Such a decentralized organizational structure can create issues with its chain of command—ultimately decreasing operational readiness. Concerns outlined from the questionnaires included instructor-created courses were not always reviewed by TSB for acceptable application by the Department. Statements from Department officials in conjunction with questionnaire responses revealed inconsistencies in the approval process for external training that did not always align with the Department's mission. Additionally, procurement documentation revealed TSB's lack of involvement in the research of judgmental shooting simulators. Therefore, OIG makes the following recommendations:

Recommendation 1: We recommend the United States Capitol Police transfer remaining training responsibilities from other organizational units to the Training Services Bureau, establishing its oversight for all training-related activity Department-wide.

Recommendation 2: We recommend the United States Capitol Police implement guidance establishing the Training Services Bureau's oversight, input, and approval authority.

Recommendation 3: We recommend the United States Capitol Police recruit a permanent training director with Federal level experience and the appropriate knowledge and skills to oversee the Training Services Bureau.

Recommendation 4: We recommend the United States Capitol Police formalize a standard process for the research and development of new training concepts and equipment that includes review and approval by the Training Services Bureau, General Counsel, and the Executive Team prior to adoption.

Inadequate Training Resources and Facilities

Lack of Training Instructors

A Department training official was asked about resource obstacles TSB faced with conducting Entry-Level and In-Service classes at the USCP training facility in Cheltenham. The official stated that one of the greatest hurdles TSB faced was a lack of training instructor manpower.

[REDACTED] The official stated that TSB needed many additional full-time training instructors because almost every training exercise required multiple instructors who could coordinate, make on-the-spot corrections, and grade an event.

On September 27, 2021, a concerned TSB official sent a memorandum entitled "Training Services Bureau Increase Staffing Request" to the Acting Bureau Commander of TSB.

[REDACTED]

The September 27, 2021, memorandum recommended [REDACTED]

[REDACTED] In conclusion, the memorandum "recommended that TSB increase the total instructors assigned from [REDACTED] adding by stating that "[w]ith multiple instructor intensive days in the recruit curriculum, and an increase in recruit classes coming through with overlap of up to five classes at a time, we need to ensure we have the proper staffing to support this while sustaining the continuity of in-service training."

As part of the research into best practices, OIG staff members gathered general information about the composition of training staff from partner agencies, which revealed that some partner agencies implemented effective strategies to supplement training staff. The approximate number of instructors from partner agencies are listed below in Table 1:

[REDACTED]

[REDACTED] There were also highly specialized temporary instructors from the various field offices who served for specified periods of time in a Temporary Duty (TDY) capacity to supplement the full-time instructors at Quantico. Additionally, the FBI Police division enrolls new recruits in the Uniformed Police Training Program at FLETC in Glynnco, Georgia.

The LETC training staff in the Department of Veterans Affairs employs [REDACTED] at its academy in Little Rock, Arkansas where it trains police recruits for its own agency as well as the U.S. Air Force.

USSS has [REDACTED] training personnel mostly from their agent and uniformed divisions [REDACTED]

The FPS [REDACTED] full-time instructors to meet its needs in all regions, FLETC, headquarters, and in-service training.

In an interview with OIG, the Chief of Police for USCP, Thomas Manger, acknowledged the need for more training instructors at TSB, stating, "I know we need to increase the numbers of our training staff but there is nowhere to put them since we are bursting at the seams at Cheltenham." He added, however, that with the current officer shortage, "I do not have the available personnel to do this now."

It should be noted that OIG has an upcoming report, the *Review of United States Capitol Police Recruiting Mechanisms and Re-Employed Annuitant Program*, which will review personnel shortages Department-wide.

Additionally, after providing our draft of this report to the Department for comment, it came to our attention that USCP requested [REDACTED] for TSB in its fiscal year 2023 budget request. Furthermore, the Department's General Counsel recently issued an opinion which would allow the Chief to waive restrictions on reemployed annuitants. However, USCP needs to develop related policies and procedures in place to move forward with the program.

Lack of Adequate Training Facilities

Chief Manger stated he would like to see all USCP training occur "up here," referring to training at "their own site" in the Washington, D.C., area rather than training occurring in many different locations such as Glynco; Cheltenham; Fort Meade, Maryland; and Quantico. Chief Manger added that the Cheltenham training facility was "inadequate" and "busting at the seams." [REDACTED]

One Department official stated the portion of the Cheltenham training facility assigned to the USCP was not sufficient for the Department's needs. Consequently, the facilities cannot accommodate the anticipated number of new recruit classes and in-service training simultaneously. The facility has four buildings used for training: Buildings 12, 31, 40, and 231. The official also stated that Building 40 was only used as a storage room because it is very small, has poor lighting, along with moisture, rodent, and insect infestation issues. During this review, TSB officials gave OIG officials a tour of Building 40, confirming that it was indeed a very small space useful only as a storage room.

Combined, the other three buildings at Cheltenham contained only four classrooms. A TSB Department official stated the Cheltenham facility sometimes had 5 training classes running simultaneously which "makes things challenging" when there are only four classrooms. The official further stated that if the Department could provide additional training space, it would benefit the TSB at Cheltenham.

Chief Manger stated the Capitol Complex is "enormous with lots of buildings but they cannot use any of them for training." He advised he would like to be able to take advantage of some of this available space for local training for USCP. Chief Manger added that "after hours when Congress is not in session" seemed like a good time for USCP to be able to conduct training in some of these buildings, but "he is getting a lot of pushback on that" idea.

A Department official stated the focus of the TSB was now to complete Entry-Level training for the anticipated [REDACTED] rather than the In-Service training for on-board employees.

The official advised this would be the emphasis for the next few years because TSB did not have sufficient resources to give equal attention to both programs.

The official also advised the number of personnel in the USCP had grown tremendously over the past 20 years but the Cheltenham campus was still the same size. Consequently, TSB now has only enough space at Cheltenham i [REDACTED] although the bureau does not have sufficient manpower to accomplish this. According to the same official, if Cheltenham could be provided sufficient classroom space for the bureau to run all its classes during an 8-hour day, TSB would become more effective and efficient.

After sending our initial draft report to the Department for comment, it came to our attention that FLETC Cheltenham recently acquired [REDACTED] from the Department of Energy. This situation provides USCP with an opportunity to begin conversations with FLETC to expand its training footprint. The Department should explore options to expand within FLETC Cheltenham.

Conclusions

The Department did not have enough training instructors to effectively and efficiently complete Entry-Level and In-Service classes at the USCP training facility in Cheltenham. This lack of training staff resulted in TSB prioritizing [REDACTED]

[REDACTED] As previously stated, many Federal agencies utilize civilian subject matter experts and highly specialized retired law enforcement personnel to supplement training staffs, which allows sworn personnel to focus on operational needs.

The Department did not have adequate training space at its training facility in Cheltenham to accomplish TSB's training mission. Given the projected staff increase for the next several years, the current footprint of TSB is inadequate. As a result, TSB must focus on Entry-Level training rather than In-Service training for current employees. Therefore, OIG makes the following recommendations:

Recommendation 5: We recommend that the United States Capitol Police increase its training staff to include the use of civilian subject matter experts as well as retired law enforcement to enhance its overall training capabilities.

Recommendation 6: We recommend that the United States Capitol Police formally pursue enlarging its training space at the Federal Law Enforcement Training Center in Cheltenham, Maryland and/or obtaining appropriate training facilities in the Washington, D.C., Metropolitan Area as a long-term solution for effectively and efficiently meeting its training needs.

Non-Compliance with Guidance and Best Practices

The Department did not always adhere to training-related guidance, and its training policies and procedures were not consistent with the best practices of other Federal law enforcement agencies.

Accreditation

Research into best practices revealed that the USCP accreditation process did not align with that of partner agencies. Although the Department follows the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) standards, many of its partners follow Federal Law Enforcement Training Accreditation (FLETA) standards. CALEA was established in 1979 as a body of standards designed to improve a law enforcement agency's liability, transparency, and management practices and help them meet their goals for best police practices. It provides public safety agencies with an opportunity to voluntarily meet an established set of professional standards, which require:

- Comprehensive and uniform written directives that clearly define authority, performance, and responsibilities
- Reports and analyses to make fact-based and informed management decisions.
- Preparedness to address natural or man-made critical incidents
- Community relationship-building and maintenance
- Independent review by subject matter experts
- Continuous pursuit of excellence through annual reviews and other assessment measures

According to a CALEA representative, roughly 900 to 1,200 police departments are CALEA accredited, with a vast majority of them state and local police agencies. As of April 2022, the Department was accredited at the Advanced level but will be moving a Tier One. A Department official stated the decision for the Tier One accreditation is due to the reallocation of resources for reforms stemming from the events of January 6, 2021. The difference between the two levels is based on the number of standards that must be met. An Advanced level requires 458 of standards and the Tier One 180 standards. In addition, the Department has been granted two prior extensions to complete their CALEA re-certification.

However, FLETA is a training accreditation model that many Federal agencies use and/or have transitioned to. The model was established as a body of standards and procedures Federal agencies could use to evaluate training academies and training programs used for training Federal law enforcement agents and officers. Some Federal agencies represented on the FLETA Board include the U.S. Marshals Service, USSS, Drug Enforcement Agency, Federal Law Enforcement Training Centers, and the U.S. Customs and Border Protection. The intent of using FLETA was to develop an independent accreditation process that provided Federal law enforcement organizations with an opportunity to voluntarily demonstrate that they met an established set of professional standards and received appropriate recognition.

The FLETA Board is comprised of senior law enforcement and training professionals from Federal and independent agencies or organizations. The Board's primary focus is to promote excellence in law enforcement operations through FLETA accreditation of training academies/programs. The Board meets regularly to conduct business and consider academies/programs for accreditation.

As shown in Table 2, USCP is the only Federal agency utilizing CALEA standards while all other agencies moved to the FLETA accreditation.

Table 2. Accreditation of Partner Agencies

Agency	Accreditation
USCP	CALEA
Federal Bureau of Investigation	FLETA and Internal Accreditation
Veterans Affairs Police	FLETA
Federal Protective Service	FLETA
United States Secret Service	FLETA

Source: Department and Partner Agency Officials.

The Deputy Chief of the VA LETC stated that FLETA "is not a rubber stamp" but had greatly improved the VA's Police training program. As well, the SAIC of the USSS Training Center stated there are 47 FLETA standards covering policy and evidence that aligns with all legal requirements for law enforcement training. Six of USSS's training programs are FLETA-accredited. The most recent Federal agency to transition to FLETA from CALEA was the U.S. Mint Police in late 2021.

FLETA's accreditation program does not burden an agency seeking accreditation with substantial expenses. According to a FLETA representative, there is no cost for the accreditation process itself except for some nominal travel expenses for FLETA assessors incurred if none are available in the agency's geographic location. CALEA's accreditation costs are based on the number of employees within the agency which can escalate.

Inaccurate Training Records

Maintaining accurate training records for personnel is critical for ensuring an efficient and effective unit. During 2020, the Department designated the APEX system as its training system of record, which replaced the Training Management system. However, not every organizational unit in the Department records its training into the APEX System—resulting in inaccurate training records.

APEX is divided into three modules: learning, recruitment, and performance. The "APEX Learning" section focuses on training where administrators and training coordinators can assign and record training. In addition, end users can view their training records and assigned training.

USCP Directive 2062.002, *In-Service Training*, dated September 30, 2020, states, "Other organizational elements will enter Bureau/Office specific training into the APEX Learning module." From our questionnaire responses, 17 organizational units did not enter all of their training records into APEX. Other than APEX, units capture training on Excel spreadsheets and attendance rosters. Such practices can lead to inconsistent training records across the Department.

According to questionnaire respondents, not all training was entered into APEX, 54.3% of the divisions advised internal training was not captured by APEX. Additionally, 69% of the respondents stated they created Excel spreadsheets or other internal documents to track training which was not entered into APEX.

The root of most complaints stem from comparing the APEX system to its predecessor. According to a Department official, despite having completed training on the APEX system, some personnel have been reluctant or unable to use it. Complaints include trouble with system navigation, generating reports, difficulty inputting information, and overall user experience. The Department's Chief Information Officer is aware of the complaints and is collaborating with TSB to provide additional APEX training to employees.

Firearms Certifications

Although we found that all the sampled individuals had their handgun qualifications for FY 2020 and FY 2021, [REDACTED]

To validate officer's handgun [REDACTED] certifications for FY 2020 and FY 2021, OIG judgmentally [REDACTED]

Directive 2062.001 requires that sworn employees must qualify semiannually with their issued [REDACTED]—once between October 15 and March 31 and once between April 1 and September 30.

To determine whether officers received handgun and [REDACTED] qualification, OIG judgmentally selected 48 officers from the Department's *Listing of all active USCP employees as of 09-30-21* to validate semiannual qualifications for handguns and [REDACTED] during FY 2020 and FY 2021. We reviewed the Department's FY 2020 and FY 2021 handgun [REDACTED] training. Of the 48 sampled officers, all 48 sampled officers had their handgun qualifications for FY 2020 and FY 2021.

The results for [REDACTED] qualifications were not consistent. [REDACTED]

According to the Department, the reason for inconsistent results was that the [REDACTED]

[REDACTED] Each division requires a certain number of certified and trained officers to staff specified locations. [REDACTED]

[REDACTED] As a result, TSB may not have been able to ensure that officers [REDACTED] were properly qualified.

The *GAO Standards for Internal Control in the Federal Government*, dated September 2014, state:

Management establishes expectations of competence for key roles, and other roles at management's discretion, to help the entity achieve its objectives. Competence is the qualification to carry out assigned responsibilities. It requires relevant knowledge, skills, and abilities, which are gained largely from professional experience, training, and certifications.

In this case, USCP management set its expectations for competence via requirements to be qualified for [REDACTED] but that guidance does not identify [REDACTED] As previously mentioned, [REDACTED]

¹ AC-000-75, *Deployment, Storage, Security and Accountability* [REDACTED] dated September 30, 2010

Without specific guidance that identifies the [REDACTED] TSB cannot ensure that individuals using [REDACTED] which may lead to an officer causing harm to themselves or others.

Online Training

On October 15, 2019, TSB issued Bulletin 19.65 - *FY20 Mandatory Training Launches October 15, 2019*, and Bulletin 20.133 - *FY2021 Mandatory Online Training Modules Available in APEX Learning*, dated November 13, 2020, lists required online training for USCP employees. OIG judgmentally selected 48 officers from the Department's *Listing of all active USCP employees as of 09.30.21* to validate online training for FY 2020 and 2021. USCP was unable to provide the online training records for FY 2020 because the new online training tracker, APEX, did not go into use until Calendar Year 2020. However, the Department was able to provide the sampled officers FY 2021 online training records. OIG found that 88 percent or 42 of 48, of the sampled officers completed all required online training for FY 2021. Though TSB achieved 88 percent compliance, TSB can improve with better compliance monitoring.

GAO Standards for Internal Control dated September 2014 state:

Management monitors the internal control system through ongoing monitoring and separate evaluations. Ongoing monitoring is built into the entity's operations, performed continually, and responsive to change. Separate evaluations are used periodically and may provide feedback on the effectiveness of ongoing monitoring.

Without better monitoring, officers may not receive vital training that enhances security, safety, and health.

Cyber Security Training

Directive 2081.007, *Account Management*, dated August 24, 2020, requires that officers take yearly cyber security training.² OIG judgmentally selected 48 officers from the Department's *Listing of all active USCP employees as of 09.30.21* to validate officer's cyber security training for FY 2020 and 2021. For FY 2020, we found that all 48 officers sampled had taken the required cyber security training. However, in FY 2021, only 81 percent, or 39 of the 48 officers, took the cyber security training. That likely occurred because the Office of Information Systems (OIS), which is currently responsible for ensuring the completion of cyber security training, did not effectively monitor officers for compliance with cyber security training. However, training is not OIS's main function and it may be preferable for TSB to be responsible for all training, including, cyber security training. Without better monitoring of cyber security training, Department employees may become lax and compromise the USCP's information systems.

² For the purposes of this report, OIG will use the term "cyber security training" to encompass 2020 IT Security Awareness Training Phase 1, 2020 IT Security Awareness Training Phase 2, 2021 Cyber Security Core Training, and 2021 Cyber Security Core Training Phase 2.

Conclusion

USCP's accreditation process did not comply with those of partner agencies. In addition, the Department did not adhere to guidance related to training records, and we found that USCP's guidance did not identify who must be qualified [REDACTED]. Furthermore, TSB should have increased oversight of cyber security and online training for compliance with guidance. Therefore, OIG makes the following recommendations:

Recommendation 7: We recommend that the United States Capitol Police transition to the Federal Law Enforcement Training Accreditation.

Recommendation 8: We recommend the United States Capitol Police ensure it provides additional APEX training to users designated as administrators and training coordinators.

Recommendation 9: We recommend that the United States Capitol Police implement additional controls for ensuring all completed training is captured in APEX per United States Capitol Police Directive 2063.002, *In-Service Training*, dated September 30, 2020.

Recommendation 10: We recommend that the United States Capitol Police implement guidance clearly identifying which officers or positions require [REDACTED] qualification to ensure an accurate accounting of officers needing [REDACTED] qualifications.

Recommendation 11: We recommend that the United States Capitol Police increase the Training Services Bureau's oversight for compliance with cyber security and online training.

APPENDICES

Listing of Recommendations

Recommendation 1: We recommend the United States Capitol Police transfer remaining training responsibilities from other organization units to the Training Services Bureau establishing its oversight for all training-related activity Department-wide.

Recommendation 2: We recommend the United States Capitol Police implement guidance establishing the Training Services Bureau's oversight, input, and approval authority.

Recommendation 3: We recommend the United States Capitol Police recruit a permanent training director with Federal level experience and the appropriate knowledge and skills to oversee the Training Services Bureau.

Recommendation 4: We recommend the United States Capitol Police formalize a standard process for the research and development of new training concepts and equipment that includes review and approval by Training Services Bureau, General Counsel, and the Executive Team prior to adoption.

Recommendation 5: We recommend the United States Capitol Police increase its training staff to include the use of civilian subject matter experts and retired law enforcement to enhance its overall training capabilities.

Recommendation 6: We recommend that the United States Capitol Police formally pursue enlarging its training space at the Federal Law Enforcement Training Center in Cheltenham, Maryland and/or obtaining appropriate training facilities in the Washington, DC Metropolitan Area as a long-term solution to effectively and efficiently meet its training needs.

Recommendation 7: We recommend the United States Capitol Police transition to the Federal Law Enforcement Training Accreditation.

Recommendation 8: We recommend the United States Capitol Police ensure it provides additional APEX training to users designated as administrators and training coordinators.

Recommendation 9: We recommend the United States Capitol Police implement additional controls to ensure all completed training is captured in APEX per United States Capitol Police Directive 2063.002, *In-Service Training*, dated September 30, 2020.

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Recommendation 11: We recommend that the United States Capitol Police increase the Training Services Bureau's oversight for compliance with cyber security and online training.

DEPARTMENT COMMENTS



UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF
1000 EAST WING
WASHINGTON, DC 20540-5001

April 28, 2022

COP 211139

MEMORANDUM

TO: Ronald Gregory
Acting Inspector General

FROM: 1 Thomas Vander *for*
Chief of Police

SUBJECT: Response to the Office of Inspector General's Draft Report: Review of the United States Capitol Police Training Services Bureau (Investigative Number: 2022-I-0003)

The purpose of this memorandum is to provide the United States Capitol Police ("USCP" or "Department") response to the Office of Inspector General's (OIG) draft report *Review of the United States Capitol Training Services Bureau* (Investigative No. 2022-I-0003).

The Department generally concurs with the OIG's recommendations as documented in the draft report. The Department submits the following primary clarification for consideration in finalizing the draft report.

While the USCP continues to take steps to improve the efficiency and effectiveness of Department-wide training processes, a complete transformation of the Department's training programs will require a multi-year approach with direct support and involvement from our stakeholders, to include funding and authorities. As such, it should be noted that the Department's Fiscal Year (FY) 2024 budget request includes \$5.4 million in fund positions and programs to enhance training opportunities for new recruits, specialty units and experienced employees. Specifically, the Department has requested five training instructors to support specialty unit training requirements for units such as Diplomatic Protection, CERT, Canine, etc., which are not current capabilities within the Training Services Bureau (TSB). In addition, the Department has requested [REDACTED] and Virtual systems training, and support personnel to administer the overall training programs for the USCP in a more centralized manner. During the FY 2024 budget cycle, the Department plans to further benchmark organizational structure and staffing levels for law enforcement training programs and evaluate the findings in the context of the Department's overall training program needs.

Further, dedicated training facilities to support the Department's training needs, such as classrooms, [REDACTED] will require prioritized commitments from the Department of Homeland Security (DHS) Federal Law Enforcement Training Centers (FLETC) to provide existing space at the Cheltenham facility, as well as develop facilities on existing land to meet expanded needs. Additionally, it would be beneficial to the Department for DHS to provide this support in a manner similar as for basic

DEPARTMENT COMMENTS

officer training, as noted in annual appropriations language. Without the prioritization of USCIP training requirements by the DHS, the Department will require the support of the Congress to locate, design, fund and build a state-of-the-art training facility.

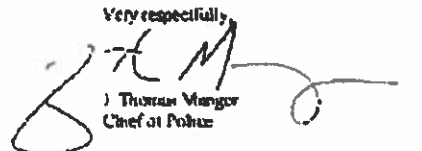
The OIG's draft report includes findings related to the TSA's involvement in Department-wide planning regarding training activities. While the Department agrees with the OIG's recommendations regarding centralization of training responsibilities and enhanced policy guidance, it should be noted that TSA currently leads a rigorous annual planning process that incorporates prioritized training requirements from each organizational unit, which are evaluated and validated at the Executive Team level for inclusion in the IFCP's annual budget submission. This provides the TSA with the opportunity to provide input and oversight of the training activities throughout the Department not currently managed by TSA.

Further, while more standardization is needed to formalize research and development of new training concepts, TSA is not currently completely removed from this process. Specifically, in relation to the recent purchase of Virta Virtual Training Systems, TSA participated in several system demonstrations, was involved in the review of the decision paper, training plans and lesson plans, and obtained Law Enforcement Instructor Training Program training for more collateral instructors.

The Department appreciates the opportunity to further improve upon the policies and procedures within the TSA and will provide a detailed corrective action plan upon receipt of the final report. As noted above, the timeliness for completion of implemented improvements will largely be dependent on the direct support of DHS and the Commission.

Thank you for the opportunity to respond to the OIG's draft report. Your continued support of the women and men of the United States Capitol Police is appreciated.

Very respectfully,



Thomas Manger
Chief of Police

cc: Assistant Chief Yogananda D. Priyansu, Protective and Intelligence Operations
Acting Assistant Chief Sean P. Gallagher, Uniformed Operations
Richard L. Bruckloch, Chief Administrative Officer
Carol A. Albrecht, Program Manager, Asset Liaison

Department Questionnaire

USCP Training Division Level Questionnaire

Name / Title:

USCP/Agency Division:

1. What is the approximate number of personnel in your division? Do you have an organization chart for your division? If so, please include a copy when sending your response.
2. Do you have an adequate number of personnel for you to accomplish your mission? How much overtime do you average currently? How much overtime did you average prior to January 6, 2021?
3. How many hours of training is conducted in a monthly, quarterly, and annual basis in your division?
4. Please list all positions within your division with their respective training requirements (e.g., HD Officer – ALERT Training, [REDACTED] firearm qualifications, etc.).
5. Is there an individual in your division responsible for training?
6. Do you have designated instructors within your division? How many designated instructors are assigned to your division? How many hours in a typical year do they spend on training related responsibilities? Are these designated instructors sworn or civilian?
7. Do they hold any certifications as instructors? If so, what certifications?
8. How often are an instructor's training certifications renewed?
9. Please list training courses/activities that are conducted and managed by your division.
10. Please list how often these courses/activities occur, monthly, quarterly, or annually?
11. What qualifications are required to teach each course listed in question #9?
12. Please list training courses/activities that are conducted and managed by TSB for your division (if not the USCP, by the specific agency's centralized training division). Please include the number of hours per course.
13. Is there an approving authority for adding new courses?
14. What is the approving process for adding new courses?
15. What are the annual mandatory training requirements for your division?

Department Questionnaire

16. What is the ratio of compliant and delinquent training requirements listed by quarter and by year for 2020 and 2021? Who is responsible for monitoring and ensuring employees are in compliance with training requirements?
17. Does your division have a designated training coordinator? Who is assigned as the training coordinator for your division and what are their duties? How many hours in a typical year do they spend on training related responsibilities?
18. What are the requirements to become a training coordinator?
19. Is your division's training coordinator a sworn or civilian employee?
20. Are the duties involving training coordination considered as an additional responsibility? If so, what percentage of their time is spent on training responsibilities?
21. If applicable, what training is required to become a training coordinator?
22. Does your training coordinator conduct research into emerging trends and technologies relative to your division's specific mission?
23. Does your training coordinator establish relationships with other entities within the department or with outside government/non-government entities for additional training resources? Do you participate in joint training with any other Department or non-Department entities? If so, who and how often?
24. What requirements must be met to initiate or to deliver a training course?
25. What type of training record keeping system does your division utilize to track training?
26. Is all of your training tracked in APEX?
27. Is this record keeping system readily accessible by individual employees so they can determine if they are current on their mandatory training?
28. How are employees notified of mandatory training/ weapons qualifications?
29. Is your budget adequate for you to accomplish your mission?
30. How is your division rated for training performance?
31. What improvements would you like to see made to TSB?

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Write us – we are located at:
United States Capitol Police
Attn: Office of Inspector General, Investigations
119 D Street, NE
Washington, DC 20510



Or visit us – we are located at:
499 South Capitol Street, SW, Suite 345
Washington, DC 20003



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When making a report, convey as much information as possible such as:
Who? What? Where? When? Why? Complaints may be made anonymously or you may request confidentiality.

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