



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Evaluation of Dignitary Protection Division Report Number OIG-2013-07 September 2013

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UNITED STATES CAPITOL POLICE
WASHINGTON, DC 20003

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 in a series of audits, reviews, and investigative and special reports that OIG periodically prepares as part of its oversight responsibility with respect to the United States Capitol Police 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. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG, and have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

A handwritten signature in cursive script that reads "Fay F. Ropella".

Fay F. Ropella, CPA, CFE
Inspector General

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Abbreviations and Acronyms

Dignitary Protection Division	DPD
Fiscal Year	FY
Full-Time Equivalent	FTE
Generally Accepted Government Auditing Standards	GAGAS
Government Accountability Office	GAO
Government Auditing Standards	GAS
Office of Inspector General	OIG
Private First Class	PFC
Protective Services Bureau	PSB
Sergeant	SGT
Standard Operating Procedures	SOP
Time and Attendance	T&A
United States Capitol Police	USCP or the Department

EXECUTIVE SUMMARY

Based on an investigation, the Office of Inspector General (OIG) contracted with [REDACTED] to conduct a performance audit of the United States Capitol Police (USCP or the Department) Dignitary Protection Division (DPD) program. The objectives of the audit were to determine if DPD (1) established adequate internal controls and processes that would ensure integrity of the program, and (2) complied with applicable laws, regulations, and guidance pertaining to the management operation of DPD. Our scope included DPD controls, processes, and operations as of October 1, 2011, through December 31, 2012.

Government Auditing Standards (GAS) require auditors when conducting a performance audit to adequately plan and document the planning of work. Audit objectives can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria. However, our contractor was unable to conduct a performance audit because the Department had not developed or established adequate criteria for DPD for the auditors to assess effectiveness and efficiency of operations or the compliance with applicable laws and regulations. Accordingly, the contractor's work resulted in an evaluation of the program instead of a performance audit.

Overall, the Department issued guidance ensuring that USCP DPD can accomplish its mission. However, some areas, such as strengthening DPD internal controls and establishing adequate criteria to measure compliance and performance, need improvement. For example, DPD Standard Operating Procedures (SOPs) did not establish criteria for consistent preparation and submission of reports, although the SOPs regarding report processing described required types of reports.

The SOPs also did not establish a report format or when reports were due. As a result, the reports that DPD agents submit may not be timely or in the appropriate electronic format. In addition, agents may or may not use the latest report versions or formats. According to interviews of DPD officials, the methods that agents use for transmitting files—such as hotel computers—may not be secure. Use of flash drives on hotel computers is a common practice, but could result in opportunities for data integrity and security issues. Furthermore, no evidence existed that supervisory review of agent reports was conducted.

According to the Government Accountability Office (GAO) *Standards of Internal Control in the Federal Government*, information should be promptly recorded to maintain its relevance and value to management in controlling operations and making decisions. Internal control and other significant events need to be clearly documented, and the documentation should be readily available for examination. Documentation should appear in management directives, administrative policies, or operating manuals but may be in paper or electronic form. Documentation and records should be properly managed and maintained.

We initially set out to determine if DPD complied with applicable regulation, laws, and guidance but discontinued those efforts after we found that the SOPs were poorly designed and incomplete.

Officials stated that DPD did not require further assessment of agents beyond the initial qualification. Refresher training was haphazard. DPD would benefit from establishing and monitoring training goals for each agent.

DPD does, however, have opportunities for using its limited resources more efficiently and effectively. For example, the Department could achieve cost savings by conducting additional DPD Basic Agent Training, increasing the pool of resources available to DPD, and/or using civilians rather than sworn officers to perform administrative tasks.

To develop a more efficient and effective DPD that ensures the integrity of the program and supports the business processes and mission of USCP, we recommended that the Department immediately improve its policies and procedures, thereby ensuring the effectiveness and efficiency of operations and compliance with established guidance. See Appendix A for complete list of recommendations.

We provided a draft copy of this report to Department officials for comment on September 20, 2013. We incorporated the Department's comments as applicable and attached their response to the report in its entirety in Appendix B.

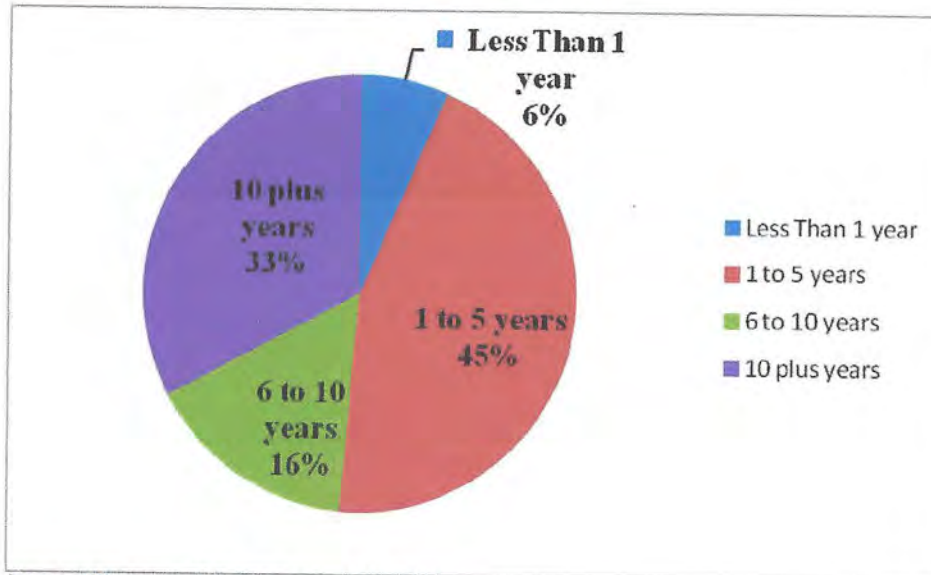
BACKGROUND

The United States Capitol Police (USCP or the Department) maintains the Dignitary Protection Division (DPD) within the Protective Services Bureau (PSB). Its duties include providing protection of congressional leadership—including coordination of security arrangements for domestic and international travel through advance security surveys and on-the-ground protection.

DPD provides personal security of Members of Congress and their families; visiting officials of foreign, Federal, state, and/or local governments; and other congressional visitors. DPD also provides protective coverage for congressional events such as congressional hearings and sessions, official functions, and other events identified by the respective Sergeant at Arms and/or Chief of Police. DPD develops and implements SOPs as needed to accomplish its mission.

DPD is authorized a manpower of [REDACTED] full-time equivalents, (FTEs), consisting of [REDACTED] Agents, [REDACTED] Sergeants, [REDACTED] Lieutenants, [REDACTED] Captain, and [REDACTED] Inspector. As of September 2013, no civilian employees are assigned to the DPD mission. As shown in Exhibit 1, more than 33 percent of the agents have more than 10 years of experience with DPD.

Exhibit 1 - Length of Time Agents Have With DPD



Source: OIG generated from data provided by DPD.

Department guidance includes numerous SOPs related to protective service. Many of the SOPs discuss specific functions inherent with DPD. Some of these functions involve reporting. SOPs specific to reporting are as follows:



OBJECTIVE, SCOPE, AND METHODOLOGY

Based on a previous investigation of DPD time & attendance (T&A) irregularities, OIG contracted with [REDACTED] to conduct a performance audit of DPD. The objectives of the audit were to determine if DPD (1) established adequate internal controls and processes to ensure the integrity of the program, and (2) complied with applicable laws, regulations, and guidance pertaining to the management operation of DPD. Our scope included DPD controls, processes, and operations as of October 1, 2011, through December 31, 2012.

Government Auditing Standards (GAS) require auditors when conducting a performance audit to adequately plan and document the planning of work. Audit objectives can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria. Because DPD had poorly designed guidance and accountability issues, we discontinued our original goal of conducting a performance audit and instead performed an evaluation of the program.

As part of our evaluation methodology, we obtained an understanding of the working environment in DPD. We reviewed DPD policies and procedures and interviewed officials and sworn officers assigned to DPD to gain an understanding of:

- Structure and strategy, including how the DPD supports the USCP mission
- DPD policies and procedures
- Suggestions for DPD improvements

We also reviewed the organizational structure, functionality of DPD, and relevant policies and procedures. We interviewed PSB staff as follows: the Deputy Chief, Inspector, Captain, ■■■ Lieutenants, and ■■■ Sergeants.

We conducted this program evaluation in Washington, D.C., from April through August 2013. We believe that the information obtained provides a reasonable basis for our conclusions. We provided a draft copy of this report to Department officials for comment on September 20, 2013. We incorporated the Department's comments as applicable and attached their response to the report in its entirety as Appendix B.

RESULTS

Overall, the Department issued guidance ensuring that USCP DPD can accomplish its mission. However, some areas, such as strengthening DPD internal controls and establishing adequate criteria to measure compliance and performance, need improvement. For example, DPD SOPs did not establish criteria for consistent preparation and submission of reports, although the SOPs regarding report processing describe required types of reports. During this time of budget constraints, the Department has opportunities to use its limited resources in a more efficient and effective manner

Internal Controls

The Government Accountability Office (GAO) *Standards for Internal Control in the Federal Government*, (GAO/AIMD-00-21.3.1, dated November 1999), define internal controls as an integral component of an organization's management that provides reasonable assurance that the following objectives are being achieved:

- Effectiveness and efficiency of operations

- Reliability of financial reporting
- Compliance with applicable laws and regulations

USCP established operating procedures for DPD to accomplish its mission. However, we identified areas that need improvement. For example, no established criteria existed for consistent preparation and submission of reports, although SOPs regarding report processing describe types of reports required. In addition, no specificity existed for format, timeliness, or review and approval process. We also noted that improvements in technology could improve consistency and increase security and efficiency.

Policies and Procedures Need Improvement

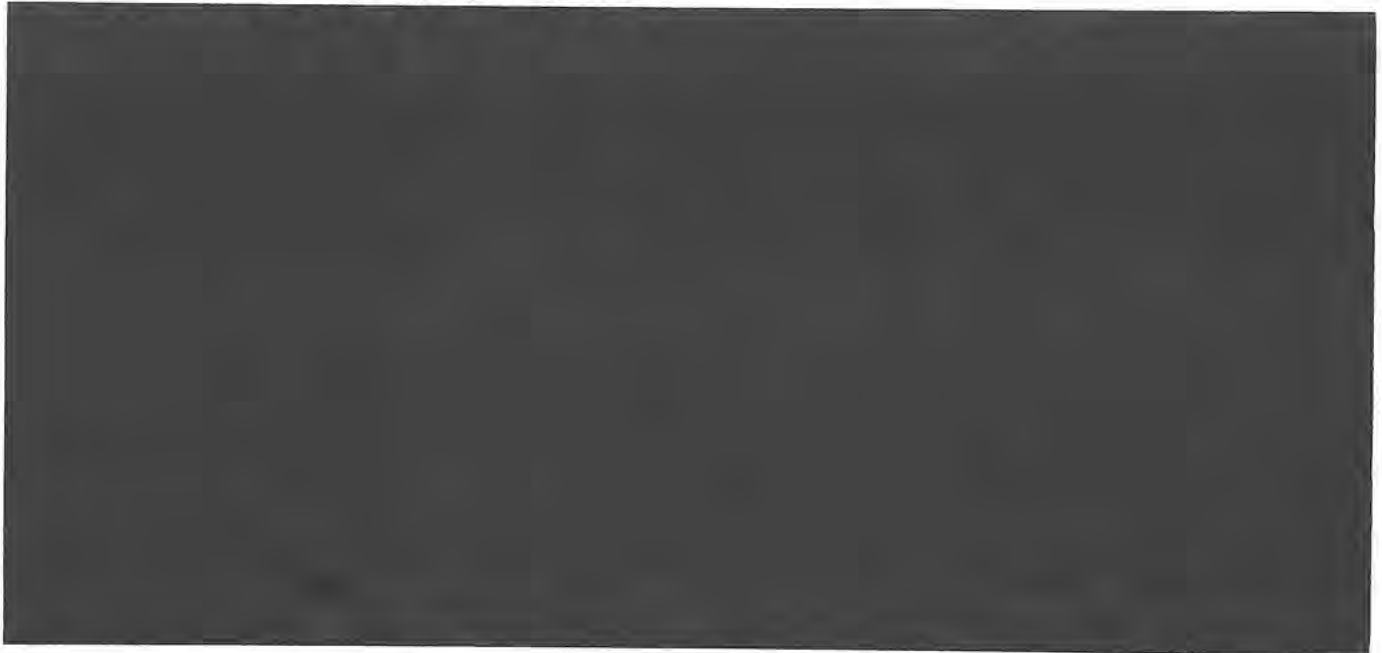
DPD SOPs were vague and did not provide specific reporting time frames or report formats. Thus, the format and reporting vary by agent and supervisor. According to DPD officials, in most cases, physical logistics is the only reason for a delay in submitting reports.

GAO, *Standards for Internal Control in the Federal Government; Appropriate Documentation of Transactions and Internal Control*, (AIMD-00-21.3.1, November 1, 1999), states:

...that internal control and all transactions and other significant events need to be clearly documented, and the documentation should be readily available for examination. The documentation should appear in management directives, administrative policies, or operating manuals and may be in paper or electronic form. All documentation and records should be properly managed and maintained.

Table 1 is a list of SOPs that relate to DPD procedures.

Table 1: DPD SOPs as of September 2013





For example, SOP [REDACTED], February 2008, provides a clear purpose, definition, and procedures for DPD Agents to accomplish [REDACTED]. However, the scope of procedures performed and resulting paperwork vary by mission. There is a significant amount of latitude that depends on the circumstances at hand such as, is this the first time an agent conducted an [REDACTED] [REDACTED] Team supervisors provide informal expectations to the agents with regard to scope of work and the timing of the submission of reports and those expectations can vary among supervisors. No evidence existed that suggested variances impacted the effectiveness of the mission.

We also noted another deficiency in the design of SOPs—evidence of supervisory review was not required. GAO *Standards for Internal Control in the Federal Government* state that information should be recorded and communicated to management and others within the entity who need it and in a form and within a time frame that enables them to carry out the internal control and other responsibilities. Managers should compare actual performance to planned or expected results throughout the organizations and analyze significant differences. In addition, activities should be established that will monitor

performance measures and indicators. Controls should also be aimed at validating the propriety and integrity of both organizational and individual performance measures and indicators.

Furthermore, subjective evidence suggests that improvements in technology could improve consistency and increase security and efficiency. Reports accessed on a secure server and updated in a timely manner would ensure that agents are always using the most up-to-date versions, as many of the DPD surveys are updates of historical documents. Updating the most recent version would improve efficiency. Additionally, reports are used to validate T&A claims. Having such reports readily available for use by T&A staff, rather than having to chase down information, would improve efficiency.

DPD officials admitted that technology is not consistently used. DPD issues laptop computers at the team level, which prevents consistent access at the agent level. Without access to a USCP-issued laptop, agents resort to other methods to transmit data, such as flash drives, hotel business center computers, and personal computers. Each of those alternatives creates concerns about data integrity and security.

Compliance with Current Standard Operating Procedures

GAS requires auditors when conducting a performance audit to adequately plan and document the planning of work. Audit objectives can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria. As noted, SOPs were poorly designed and lacked adequate accountability policies to report DPD activities and identify further actions required or taken. We noted that the Department's SOPs were only intended for guidance and general instruction.

We reviewed 34 SOPs related to DPD and noted that the Department has not updated some of the SOPs since 2004. Table 2 reflects the aging of SOPs at DPD.

Table 2 – Aging of DPD Standard Operating Procedures

<i>Year SOP Issued</i>	<i>Number of SOPs</i>
2010	12
2008	9
2007	6
2006	2
2005	3
2004	2
Total	34

Source: OIG generated from USCP DPD SOPs issued from 2004-2010.

As a result of poorly designed and current guidance, we were unable to test against any established accountability and performance criteria or defined standards. DPD SOPs were only general instruction and guidance.

Conclusions

Areas need improvement such as updating SOPs, strengthening DPD internal controls, and establishing accountability and performance criteria to measure compliance and performance. For example, DPD SOPs were vague and did not provide specific reporting time frames or report formats. Thus, the format and reporting vary by agent and supervisor. Additionally, the design of DPD SOPs required no evidence of supervisory review, which validates the propriety and integrity of both organizational and individual performance measures and indicators. Furthermore, technology is not used consistently, resulting in some concerns for data integrity and security. Thus, OIG recommends the following:

Recommendation 1: We recommend the United States Capitol Police update its Standard Operating Procedures and internal controls to provide reasonable assurance that Dignitary Protection Division operations are effective and efficient with reliable reporting, and compliance with applicable guidance are achieved.

Recommendation 2: We recommend the United States Capitol Police consider providing Dignitary Protection Division adequate electronic equipment or establish other methods that will ensure data integrity and secure sensitive law enforcement information.

Opportunities to Use Resources in a More Efficient and Effective Manner

DPD has opportunities to use its limited resources more efficiently and effectively. For example, we noted that the Department may achieve cost savings by conducting additional DPD Basic Agent Training and/or utilize civilians for administrative tasks instead of sworn officers.

More Efficient Use of Personnel

The Department may achieve cost savings by better utilizing DPD staff. As of September 2013, DPD is authorized [REDACTED] FTEs—consisting of [REDACTED] Agents, [REDACTED] Sergeants, [REDACTED] Lieutenants, [REDACTED] Captain, and [REDACTED] Inspector. According to DPD, there are sworn and civilian staff shortages. The DPD Team Roster, dated July 1, 2013, reports shortages of four personnel—two officials and two officers. Of DPD's [REDACTED] teams, [REDACTED] were each short [REDACTED] supervisory agent and [REDACTED] agent. The Department fills shortages from the other eight DPD teams and as a result incurs additional duty costs.

DPD continues to use two sworn officers (Sergeant [SGT] and Private First Class [PFC]) to conduct administrative functions that civilians could perform. For example, sworn officers prepare daily worksheets, compile roll call packages, schedule, enter T&A data in Workbrain, prepare procurement requests and travel orders, and perform other administrative functions as described in USCP Office of Human Resources Position Descriptions for Administrative Assistant, CP-0303-05 and Administrative Officer,

While DPD duties are different from other divisions, civilians could perform administrative tasks. The salary for a PFC, grade 3/2, is approximately \$63,000. The salary for a SGT, grade 8/11, salary is approximately \$94,000. The salary for an Administrative Assistant, grade 3/7, is approximately \$45,000. The salary for An Administrative Officer, grade 7/4, is approximately \$70,000. If the Department replaced the sworn officers conducting DPD administrative functions with civilians, the agency could save approximately \$42,000 annually.

Training

USCP has established personnel qualification requirements for DPD Agents in Position Title, Police Officer (Dignitary Protection)-PFC, classification LP-0083-03, which must be met before acceptance to the DPD position. DPD does not require additional training and there are no requirements for annual refresher or continuing education courses. Agents sign up for additional training as timing and funding permits. Such a haphazard approach to training could create gaps in individual abilities leading to some agents not being prepared when a crisis arises. According to an official, some agents do not have specialized knowledge or training to sketch out a process or advance site that identifies a weak point and then develop a control for that risk.

Additionally, according to officials, DPD did not have an adequate reserve of agents and provides only basic agent training once or twice a year. Additional training opportunities could allow for a larger DPD reserve pool, which would assist when shortages occur as well as speed up the process to transfer officers into DPD. A larger reserve pool of trained agents could also reduce overtime costs. Periodic training would allow DPD to manage training goals for agents in the spirit of maintaining the highest caliber officers and would provide officers rotational opportunities for enhancing their careers and assist in succession planning and team performance.

Conclusions

The Department uses sworn officers rather than civilians to conduct administrative functions in DPD. If the Department replaced the sworn officers who conduct DPD administrative functions with civilians, a cost savings of approximately \$42,000 could be realized annually. OIG recommends the following:

Recommendation 3: We recommend the United States Capitol Police consider realignment of sworn officers conducting Dignitary Protection Division administrative functions with civilians, which could result in a more efficient use of resources and result in approximately \$42,000 in annual saving.

Recommendation 4: The United States Capitol Police should consider (1) increasing the frequency per year in which Dignitary Protection Division – required training is offered, increasing the number of officers available with Dignitary Protection Division, thus potentially reducing overtime costs, and (2) periodic refresher training for Dignitary Protection Division agents in the spirit

of maintaining the highest caliber agent and enhancing team performance and overall security for Capitol Complex and the protectees, thereby ensuring the integrity, efficiency, and effectiveness of the Dignitary Protection Division Program.

APPENDICES

List of Recommendations

Recommendation 1: We recommend the United States Capitol Police update its Standard Operating Procedures and internal controls to provide reasonable assurance that Dignitary Protection Division operations are effective and efficient with reliable reporting, and compliance with applicable guidance are achieved.

Recommendation 2: We recommend the United States Capitol Police consider providing Dignitary Protection Division adequate electronic equipment or establish other methods that will ensure data integrity and secure sensitive law enforcement information.

Recommendation 3: We recommend the United States Capitol Police consider realignment of sworn officers conducting Dignitary Protection Division administrative functions with civilians, which could result in a more efficient use of resources and result in approximately \$42,000 in annual saving.

Recommendation 4: The United States Capitol Police should consider (1) increasing the frequency per year in which Dignitary Protection Division required training is offered, increasing the number of officers available with Dignitary protection Division, thus potentially reducing overtime costs, and (2) periodic refresher training for Dignitary Protection Division agents in the spirit of maintaining the highest caliber agent and enhancing team performance and overall security for Capitol Complex and the protectees, thereby ensuring the integrity, efficiency, and effectiveness of the Dignitary Protection Division Program.

DEPARTMENT COMMENTS



UNITED STATES CAPITOL POLICE

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130349

September 24, 2013

MEMORANDUM

TO: Ms. Fay Ropella
Inspector General

FROM: Kim C. Dine
Chief of Police

SUBJECT: Response to Office of Inspector General (OIG) draft report Evaluation of Dignitary Protection Division (Report No. OIG-2013-07)

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendations contained within the Office of the Inspector General's (OIG's) draft report *Evaluation of Dignitary Protection Division* (Report No. OIG-2013-07).

The Department agrees with all of the recommendations and appreciates the opportunity to work with the OIG to further improve upon current policies and procedures currently in place within Dignitary Protection.

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

Very respectfully,

Handwritten signature of Kim C. Dine.
Kim C. Dine
Chief of Police

cc: Daniel B. Malloy, Assistant Chief of Police
Richard L. Braddock, Chief Administrative Officer
[REDACTED] USCP Audit Liaison

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