



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Follow-up Analysis of United States Capitol Police Controls over Ammunition

Report Number OIG-2017-09

July 2017

~~Report Restriction Language~~

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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.

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

Fay F. Ropella
Inspector General

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Abbreviations and Acronyms

Chief Administrative Officer	CAO
Containment Emergency Response Team	CERT
Office of Facilities and Logistics	OFL
Office of Inspector General	OIG
Property and Asset Management Division	PAMD
Physical Skills Division	PSD
Rayburn House Office Building	RHOB
Standard Operating Procedure	SOP
Training Services Bureau	TSB
United States Capitol Police	USCP or Department

EXECUTIVE SUMMARY

In a previous audit, *United States Capitol Police Controls over Ammunition* (Report Number OIG-2014-03), dated March 2014, the Office of Inspector General (OIG) found the United States Capitol Police (USCP or Department) did not establish effective internal controls and processes for ensuring accountability of ammunition. To develop more efficient and effective controls over the accountability of ammunition in detecting and preventing fraud, waste, abuse, and mismanagement, OIG made 10 recommendations, which the Department agreed to implement. As of August 8, 2016, the Department had fully implemented all 10 recommendations based on comments and documentation provided to OIG.

At the request of the former Office of Facilities and Logistics (OFL) Director, and in accordance with our annual plan, OIG conducted follow-up work on the Department's implementation of recommendations contained within Report Number OIG-2014-03. Our objective of this follow-up analysis was to confirm that the Department took the appropriate corrective actions and controls the Department implemented were operating efficiently and effectively. Our scope included existing controls over ammunition related to implementation of recommendations outlined in our previous report.

We conducted interviews, site visits, and reviewed relevant documentation to gain an understanding of the Department's implementation of recommendations. Our follow-up confirmed the Department implemented the recommendations appropriately. For example, the Department implemented Standard Operating Procedure [REDACTED], which included procedures related to inventories, stock rotation, reorder points, disposal, and access control. Additionally, the Department transferred the USCP Weapon and Ammunition Program from the Training Services Bureau Physical Skills Division to OFL Property and Asset Management Division to achieve a better segregation of duties related to its ammunition inventory. Furthermore, as of May 8, 2017, the Department had received \$22,923 for recycling the spent shell casings generated at its firing range.

During our follow-up work, a Department employee brought a matter to our attention regarding non-USCP personnel using USCP weapons and ammunition at its range. We found the Department had established policies and procedures related to non-USCP entities use of its range. Thus, OIG did not make any additional recommendations in this report.

On June 15, 2017, we provided a draft report to the Department for comment and attached their response in its entirety in Appendix A.

BACKGROUND

In previous work, *United States Capitol Police Controls over Ammunition* (Report Number OIG-2014-03), dated March 2014, the Office of Inspector General (OIG) found the United States Capitol Police (USCP or Department) did not establish effective internal controls and processes that would ensure accountability of ammunition. The Department had not updated since 2008 its Standard Operating Procedure (SOP) used for accountability of ammunition. Although the Department had a draft SOP, the SOP was vague and did not provide details about the proper accounting for ammunition. Furthermore, the Memorandum of Understanding with the Department of Homeland Security for the use of the Federal Law Enforcement Training Center at its Cheltenham, Maryland facilities and its annual reimbursable agreement were not up to date. In addition, the Department did not adequately segregate duties related to the ordering, receiving, inventorying, controlling, and accounting for ammunition.

The Department did not always comply with USCP Directive [REDACTED] (October 19, 2012), [REDACTED] (June 30, 2008), or industry best practices. For example, the Department did not (1) always notify the Office of Facilities and Logistics (OFL) Property and Asset Management Division (PAMD) of delivery of ammunition as required, (2) always file reports for lost/stolen/transferred/destroyed ammunition, or (3) conduct semi-annual or annual inventories as guidance requires.

Because the Department did not track, inventory, or account for training ammunition, that ammunition became stockpiled. Moreover, because it did not maintain a perpetual inventory of daily ammunition transactions, the Department did not have a complete or accurate inventory of ammunition.

Opportunities existed for the Department to use its resources in a more efficient and effective manner. The Department did not benefit from recycling spent shell casings generated at the firing range. In addition, the Department maintained ammunition that was not in a usable condition because there was no process for the destruction of confiscated and/or damaged ammunition.

To develop more efficient and effective controls over the accountability of ammunition to detect and prevent fraud, waste, abuse, and mismanagement, we made 10 recommendations, which the Department agreed to implement. As of August 8, 2016, OIG had closed all 10 recommendations based on comments and documentation provided by the Department.

The Training Services Bureau (TSB) Physical Skills Division (PSD) was previously responsible for issuing firearms and ammunition. PSD was also previously responsible for ordering, receiving, issuing, inventorying, accounting for, and controlling access to ammunition.

OFL is responsible for ensuring that all Department Bureaus/Offices properly implement property and asset management procedures. PAMD is a division within OFL that provides

property accountability, inventory control, related acquisition planning, central receiving, distribution, storage, utilization, maintenance, reutilization, and/or disposal services. PAMD is responsible for the Weapon and Ammunition Program at the Rayburn House Office Building (RHOB) Range.

USCP's asset records are stored, processed, and maintained within [REDACTED] [REDACTED] is a commercial-off-the-shelf software application that the Department designated as the official system for asset management.

OBJECTIVE, SCOPE, AND METHODOLOGY

At the request of the former OFL Director, and in accordance with our annual plan, OIG conducted a follow-up on the Department's implementation of recommendations from Report Number OIG-2014-03. Our objective was to confirm the Department took appropriate corrective actions in implementing the recommendations. Our scope included existing controls over ammunition related to the implementation of recommendations as outlined in our previous report.

To accomplish our objective, we interviewed officials in the Office of Administration, OFL, Containment Emergency Response Team (CERT), House Division, Senate Division, and PAMD. We conducted site visits to observe controls of ammunition at the armories that PAMD, CERT, House Division, and Senate Division use. We reviewed Report Number OIG-2014-03 as well as correspondence between OIG and USCP related to the closure of the recommendations included in the report. Additionally, we reviewed:

- Relevant policies and procedures related to accountability of ammunition
- Ammunition inventory data
- Access control lists to the RHOB Range alarmed spaces
- Agreements between USCP and the Department of Homeland Security Federal Law Enforcement Training Center
- Funds received by the Department for recycling spent shell casings

OIG conducted this analysis in Washington, D.C., from April through June 2017. We did not conduct an audit, the objective of which would be the expression of an opinion on Department programs. Accordingly, we do 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 USCP Board, and USCP Oversight Committees and should not be used by anyone other than the specified parties.~~

RESULTS

Our follow-up work confirmed the Department had fully implemented the prior recommendations included in Report Number OIG-2014-03. During our follow-up work, a Department employee brought another matter to our attention regarding non-USCP personnel use of its range.

Full Implementation of Recommendations

In a previous audit (Report Number OIG-2014-03), OIG found the Department had not established effective internal controls and processes for ensuring accountability of ammunition. To develop more efficient and effective controls over the accountability of ammunition in detecting and preventing fraud, waste, abuse, and mismanagement, OIG made 10 recommendations, which the Department agreed to implement. Based on our follow-up work, the Department had fully implemented the recommendations as follows:

Recommendation 1: We recommend that the United States Capitol Police finalize its draft Standard Operating Procedure [REDACTED], and establish detailed procedures and practices such as reorder points and rotation of stock to ensure accountability of ammunition and communicate those controls to all personnel.

According to Department responses to recommendations contained within Report Number OIG-2014-03: in March 2014, the Chief Administrative Officer (CAO) directed that PAMD assume control of the Weapon and Ammunition Program at the RHOB Range so that it could inventory and control all assets. The Department also implemented SOP [REDACTED] on March 18, 2015.

We obtained and reviewed SOP [REDACTED]. We confirmed the Department implemented various controls over ammunition included in SOP [REDACTED] related to inventories, stock rotation, reorder points, disposal, and access control, by conducting site visits and reviewing documentation the Department provided.

Recommendation 2: We recommend that the United States Capitol Police review and finalize its Memorandum of Understanding with the Department of Homeland Security related to the Federal Law Enforcement Training Center at Cheltenham, Maryland, and establish a final reimbursable agreement for Fiscal Year 2014.

According to Department responses to recommendations contained within Report Number OIG-2014-03, USCP finalized the Fiscal Year 2014 reimbursable agreement on April 25, 2014. The Department finalized the Memorandum of Understanding on December 4, 2014.

We obtained and reviewed the most recent Memorandum of Understanding and Interagency Agreements between USCP and the Department of Homeland Security Federal Law Enforcement Training Center. We confirmed those agreements were up to date.

Recommendation 3: We recommend that the United States Capitol Police ensure that key duties and responsibilities related to ammunition are divided or segregated among a variety of personnel to reduce the risk of fraud, waste, and mismanagement.

According to Department responses to recommendations contained within Report Number OIG-2014-03, the CAO directed that PAMD assume control of the Weapon and Ammunition Program at the RHOB Range in March 2014.

We conducted a site visit of the RHOB Range and observed segregation of duties between PAMD personnel and TSB PSD firearms instructors. For example, our visit revealed that TSB firearms instructors do not have access to the PAMD ammunition storage rooms. The firearms instructors must provide PAMD with documentation of ammunition requirements and usage or PAMD will not issue them ammunition.

Recommendation 4: We recommend that the United States Capitol Police enhance physical security by restricting access to ammunition changing codes to combination locks, user names, and passwords, if applicable, and provide read-only access to inventory records. In addition, management should hold the applicable officer and custodian or both accountable for missing ammunition when a shared weapon system is transferred between shifts and officers.

According to Department responses to recommendations contained within Report Number OIG-2014-03, on April 14, 2014, the Assistant Chief of Police instructed that the Security Services Bureau install a proximity card reader to the outside door of the RHOB Range. The responses also note that the Department would install additional proximity card readers on interior doors leading to the PAMD storage rooms to further limit access and control the items.

During a site visit to the RHOB Range, we observed that PAMD maintains its ammunition within two storage rooms that are alarmed and require a proximity card to access. We obtained and reviewed access control lists for the spaces. The access control lists included PAMD employees as well as the PSD Lieutenant and Sergeants in accordance with SOP [REDACTED]. The list also included several USCP management officials. According to the CAO, any employee that could possibly be an incident commander has access to the ammunition storage areas so they could quickly access the rooms if an incident were to occur after hours. The CAO stated that the Office of Administration reviews the daily access reports for any potential unauthorized access to these spaces. The CAO stated the Department would consider any non-PAMD employee accessing the spaces without a valid explanation to be unauthorized access and the custodian would conduct a complete inventory ensuring accountability of ammunition.

Recommendation 5: We recommend that the United States Capitol Police immediately enforce compliance of United States Capitol Police Directive [REDACTED]

[REDACTED] ensuring that (1) transactions are recorded in the official inventory system including missing/damaged ammunition and (2) ammunition is inventoried periodically and reconciled to control records.

According to Department responses to recommendations contained within Report Number OIG-2014-03, in March 2014 PAMD took control of all weapons, weapons parts, and ammunition, to include maintenance of such records in [REDACTED], as well as the ordering and restocking of weapons, weapon parts, and ammunition for the Department. The Department implemented SOP [REDACTED] in March 2015.

We observed PAMD accounting for ammunition in [REDACTED]. PAMD provided records from [REDACTED] that supported recently updated ammunition inventory levels. According to a PAMD official, PAMD inventories its ammunition at the RHOB Range more often than quarterly and PAMD provided examples of recent counts. According to the official, PAMD receives daily inventory confirmations by email from all of the divisions/elements. PAMD also provided examples of recent confirmations. According to the official, PAMD completes semi-annual inventories of ammunition at the divisions/elements. PAMD provided examples from the most recent semi-annual inventory.

Recommendation 6: We recommend that the United States Capitol Police immediately establish detailed procedures over training ammunition to use best practices such as keeping a perpetual inventory of ammunition, providing ammunition with only an approved lesson plan accompanied by the course of fire, not allowing ammunition to be removed from packing containers until required for use, documenting ammunition consumption in records such as ammunition and/or scoring logs, returning leftover ammunition at the end of a session, and adding it back into the overall inventory, and reconciling ammunition turn-ins with original issue documents and consumption records.

According to Department responses to recommendations contained within Report Number OIG-2014-03, USCP Directive [REDACTED], dated December 18, 2015, USCP Directive [REDACTED], dated July 22, 2016, and SOP [REDACTED] establish detailed procedures for handling ammunition issued for training as well as qualifications.

We obtained and reviewed the SOP and directives. We conducted a site visit of the RHOB Range and observed PAMD issue training ammunition to a firearms instructor. The firearms instructor went to the window of an ammunition storage room and provided forms detailing the ammunition requirements for each individual in the training class. PAMD provided the ammunition and received the forms through a drawer under the window. After training, each individual must sign forms verifying the amount of ammunition provided and/or returned.

[REDACTED]

We reviewed the documentation listing funds the Department received for recycling its spent shell casings. As of May 8, 2017, the Department received \$22,923 since implementing the recommendation. In accordance with 2 USC§ 1906, the funds go to a USCP general expenses account where they are available during the fiscal year the Department receives them as well as the following fiscal year.

Recommendation 10: We recommend the United States Capitol Police develop a process for destruction of confiscated and/or damaged ammunition.

According to Department responses to recommendations contained within Report Number OIG-2014-03, in May 2015, the Department approved the disposal of all ammunition identified as obsolete during its 100-percent physical inventory count. SOP [REDACTED] establishes directions for the disposal of ammunition.

During our site visit to the RHOB Range, we did not observe any damaged or confiscated ammunition on the premises. According to an official, PAMD had already destroyed and/or disposed of any ammunition required. During site visits to the CERT and both the House Division and Senate Division armories, officials from each unit stated PAMD periodically collects and accounts for any rounds that appear to be old or damaged.

Conclusion

The Department's corrective actions have met the intent of OIG recommendations. Controls over ammunitions were operating efficiently and effectively. Thus, OIG considers all 10 recommendations closed.

Other Matter

During our follow-up work, a matter related to the RHOB Range came to our attention. A Department employee raised concerns regarding non-USCP personnel firing USCP weapons and ammunition at the RHOB Range. We found the Department had established policies and procedures related to non-USCP entities use of its range. Both USCP Directive [REDACTED] dated August 4, 2016, [REDACTED] dated August 4, 2016, included policies and procedures addressing non-USCP entities use of its Range. For example, the guidance requires any non-USCP entities using the RHOB Range to participate in a safety briefing and sign a firearms safety rules and procedures form. According to a Department official, USCP also requires any non-USCP personnel utilizing its range to sign a liability waiver. Thus, OIG did not make any recommendations at this time.

APPENDICES

DEPARTMENT COMMENTS



UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF
115 D STREET, NE
WASHINGTON, DC 20510-7218

July 3, 2017

COP 170424

MEMORANDUM

TO: Ms. Fay F. Ropella, CPA, CFE
Inspector General

FROM: Matthew R. Verderosa
Chief of Police

SUBJECT: Response to Office of Inspector General draft report *Follow-up Analysis of the United States Capitol Police Controls over Ammunition* (Report No. OIG-2017-09)

The purpose of this memorandum is to provide the United States Capitol Police response to the Office of Inspector General's (OIG) draft report *Follow-up Analysis of the United States Capitol Police Controls over Ammunition* (Report No. OIG-2017-09).

The Department would like to thank the Office of Inspector General for conducting this follow-up analysis on the Department's implementation of the recommendations contained within OIG-2014-03 *Controls over Ammunition*. I am pleased that the findings of this follow-up analysis confirm that the policies and procedures the Department has in place are continuing to be implemented in accordance with best practices.

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,

A handwritten signature in black ink, appearing to read "Matthew R. Verderosa".

Matthew R. Verderosa
Chief of Police

cc: Steven A. Sund, Assistant Chief of Police
Richard L. Braddock, Chief Administrative Officer
[REDACTED] USCP Audit Liaison

CONTACTING THE OFFICE OF INSPECTOR GENERAL

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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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