



UNITED STATES CAPITOL POLICE
OFFICE OF INSPECTOR GENERAL



PERFORMANCE AUDIT OF
SWORN RESOURCE ALLOCATION

Report Number: OIG-2024-06

Date: June 2024



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 in draft 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.

David T. Harper
Inspector General

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Abbreviations and Acronyms

Assistant Chief of Police	ACOP
Badging and Credentialing Division	BCD
Bureau of Alcohol, Tobacco, Firearms, and Explosives	ATF
Chief of Operations	COO
Calendar Year	CY
Dignitary Protection Division	DPD
Federal Bureau of Investigation	FBI
Government Accountability Office	GAO
International Association of Chiefs of Police	IACP
National Finance Center	NFC
Office of Background Investigations and Credentialing	OBIC
Office of Inspector General	OIG
Officer Voluntary Reassignment Program	OVRP
Operational Services Bureau	OSB
Post Requirements List	PRL
Standard Operating Procedures	SOP
Uniformed Services Bureau	USB
United States Capitol Police	USCP or the Department
United States Department of Justice	DOJ
United States Park Police	USPP
United States Secret Service	USSS

EXECUTIVE SUMMARY

In accordance with our *Annual Performance Plan Fiscal Year 2023*, dated November 2022, the Office of Inspector General (OIG) conducted a performance audit of the United States Capitol Police (USCP or the Department) sworn resource allocation. The scope of the performance audit included controls and processes in effect as of December 31, 2022.

OIG objectives were to determine if the Department (1) established adequate internal controls and processes for ensuring compliance with select Department policies, and (2) complied with select policies and procedures, laws, regulations, and best practices.

Based on our performance audit of the Department's sworn resource allocation policies and procedures, best practices, and applicable guidance, OIG found that the Department should enforce its policies, document procedures, civilianize administrative positions, and update its Standard Operating Procedures (SOPs) and directives to ensure they accurately reflect current operations.

Civilianization of administrative positions held by sworn employees is a common resource allocation strategy that law enforcement agencies use, especially during periods of staffing shortages or budget cuts. While police departments nationwide struggle to hire officers, USCP is comprised of 17 percent civilian employees compared to the national average in general-purpose law enforcement agencies of 33 percent. Reports issued by the Department, OIG, and commissioned by the Government Accountability Office (GAO) during the last 2 decades recommended civilianization of various roles within the agency. The Department has the opportunity to redirect sworn resources to critical areas while taking advantage of significant cost savings. The reallocation of resources includes administrative positions within the Office of Background Investigations and Credentialing, as well as other areas of the Department.

OIG also found that the Department did not adequately follow its policy for Post Requirement Lists (PRLs). The Department should enforce that policy by conducting annual reviews of PRLs, documenting requested changes to the PRLs in memorandums, and maintaining a change log. The policy was outdated and did not reflect the Department's organizational structure and procedures. The Department also lacked written desk procedures for implementing, maintaining, and updating the PRLs necessary for retaining organizational knowledge and facilitating accountability.

OIG made four recommendations as shown in Appendix A. On May 22, 2024, OIG provided a draft report to the Department for comments. We incorporated the Department's comments and attached its response in its entirety in Appendix B.

BACKGROUND

Law enforcement agencies nationwide have been civilianizing administrative positions performed by sworn employees for decades. Typical administrative duties that are generally accomplished by civilians include clerical, accounting, reception, dispatch, maintenance, custodial, detention, analysts, badging, researchers, crime scene processors, community liaisons, etc. The national average of full-time civilians in the more than 14,700 U.S. general-purpose law enforcement agencies as of December 2020 was 33 percent. As of June 2023, civilians in the United States Capitol Police's (USCP or the Department) comprised 17 percent of its total employees.

Civilianizing selected administrative positions has a number of benefits, the most crucial of which is freeing up sworn resources in order to redirect officers to critical areas. During periods of staffing shortages or economic recessions, civilianizing positions can help law enforcement agencies to continue to provide vital services. Another important benefit of civilianizing is cost savings. During 2022, the average gross pay for a USCP sworn employee was \$133,558 and the average gross pay for a civilian employee was \$118,395. Those figures do not include benefits and training costs, both of which are higher for sworn employees. The Department has the opportunity to both help alleviate sworn staffing shortages as well as save considerable amounts in personnel costs if they expedite the effort to civilianize administrative positions and increase their civilian rate closer to the national average.

The Office of Inspector General (OIG) recommended in several recent reports that the Department civilianize sworn administrative positions. In the June 2016 report *OIG-2016-08, Analysis of United States Capitol Police Internal Post Assignments*, OIG concluded that the Department could civilianize 60 positions within the Command Center and Communications Section, saving approximately \$2.2 million in salaries and benefits. OIG made a similar recommendation regarding Dispatcher positions in its June 2022 report, *OIG-2022-06, entitled Review of United States Capitol Police Communications Section's Dispatch and Call Taking Process*. OIG's September 2013 report *OIG-2013-07, entitled Evaluation of Dignitary Protection Division*, included a recommendation to realign Dignitary Protection Division (DPD) sworn officers performing administrative functions with civilian positions. In a March 2014 report, *OIG-2014-03, Performance Audit United States Capitol Police Controls over Ammunition*, OIG recommended the Department reassign a trained Property Asset Management Division employee to the Physical Skills Division Armory to ensure an accurate perpetual inventory. The recommendation further stated that such a reassignment would relieve sworn officers of administrative duties and allow them to conduct critical law enforcement functions.

The Department provided reports, reviews, or analyses they conducted, both internally and using external parties, in the area of Sworn Resource Allocation. The Department employs daily sworn manpower and resource allocation analyses as part of regular resource management procedures. At a higher level, and at the direction of one of the Department's oversight committees, in 1998 the Government Accountability Office (GAO) commissioned a contractor to conduct a review of selected USCP administrative operations, including staffing. The Department responded to GAO's recommendations by developing an administrative framework

to “organize, structure, administer, and manage its resources” and by establishing a strategic plan.

USCP also produced an internal report dated August 2003, entitled [REDACTED] in which the Department requested 203 new sworn positions and 230 new civilian positions. The report states that the Department should civilianize 56 positions. It further states that some of the new civilian positions allow for civilianization of sworn personnel, “thus relieving sworn personnel from undertaking duties that can be handled by civilians and allowing sworn personnel to undertake other law enforcement duties.” It also notes that additional civilians would aide in improving various administrative areas as well as supporting expansion of intelligence research capabilities, physical security measures, and technical security countermeasure inspections and evaluations.

The Department established the following three-prong criteria for determining which positions to civilianize, according to the report:

- Does the position require police powers to effectively carry out the duties assigned?
- Does the position require law enforcement training?
- Does the position provide required background for the upward mobility of sworn staff?

Congress tasked GAO with evaluating the Department’s 2003 report. GAO contracted with a private firm to assist with the evaluation and review the methodology the Department used to develop staffing level requirements for sworn and civilian positions. GAO also directed that the contractor analyze technological options for improving security and evaluating the impact on staffing needs and any benefits or risks. The report compared USCP to state and local law enforcement agencies nationwide and found that in Fiscal Year (FY) 2003 the Department was comprised of 82.8 percent sworn personnel versus 72.1 percent for the 77 nationwide agencies with 1,000 or more employees. As well, the report states that FY 2004 and 2005 budget requests included sworn rates more in line with national averages. It further states, “USCP should continue to civilianize personnel where possible following its established three-prong criteria to maximize cost efficiencies and open opportunities for outsourcing.”

Following the assessment and recommendations, the Department hired a firm to conduct a large-scale manpower study in 2007. The objectives of the study were to assess the current state of sworn and civilian manpower levels, organizational structure, and ability to adapt and respond to the changing needs, risks, and threats unique to Capitol complex. According to the Department, “The study focused on risk and threat assessments, and produced standardized, repeatable, and uniform processes to determine sworn and civilian operational staffing calculations and requirements for every aspect of the USCP’s mission.”

The Department recently implemented the Contract Security Officer Program to alleviate staffing shortages. Contract security officers, also called civilian security aides, are generally stationed at internal posts that are fixed and indoors. They do not screen individuals entering buildings from the outside through public or staff access points. As of May 11, 2023, the Department was using [REDACTED] contract security officers.

Following the events of January 6, 2021, the Department engaged a contractor to perform an overall assessment of sworn staffing and Department operations within the Uniformed Services Bureau (USB) and Operational Services Bureau (OSB). One report recommendation stated that private security should be engaged to handle [REDACTED]

Another OSB recommendation was that the Crime Scene Search section “should continue their civilianization effort and identify technical requirements and subject matter expertise needed to support the USCP mission given the myriad of crimes the USCP investigates.”

The USB report notes that in FY 2016 USCP began providing security at a new congressional office building and started security screening of staff entering the House Office Buildings through the parking garages. One way USCP used its resources to expand its mission was by civilianizing certain sworn positions and reassigning officers to more critical areas. The report further made the following recommendations regarding personnel management:

- Reinststate the drive to hire civilians into previously identified sworn positions in the Command and Control Bureau.
- Fill currently vacant civilian support positions in all areas of the Department that are being filled by sworn personnel. For example, Division administrative functions are being handled by sworn personnel due to a lack of civilian support staff.

USCP implemented Post Requirement Lists (PRLs) in 2016 when they replaced the Post Priority Lists. According to Standard Operating Procedure (SOP) [REDACTED] dated September 26, 2017, PRLs are lists of required posts for each section within the bureaus under the Offices of the Assistant Chiefs of Police for Protective and Intelligence Operations and for Uniformed Operations. In practice, however, of the 16 divisions under these two Assistant Chiefs of Police—the Capitol Division, House Division, Library Division, Senate Division, Command Division, and the Special Operations Division—6 use PRLs. Final approved PRLs drive daily schedules. According to the SOP, Bureau Commanders are required to review and evaluate the PRLs under their command annually. Division Commanders request any changes to their PRLs by submitting a memorandum to the Chief of Operations outlining their rationale. The Office of the Chief of Operations maintains approved revisions to PRLs in a Change Log. The Office of the Chief of Operations is an older term used prior to the Department’s 2019 and 2024 restructuring and reorganization. Before 2019, the Department had an Office of the Chief of Operations with one Assistant Chief of Police. The 2019 restructuring split that office into the Office of the Assistant Chief of Police for Protective and Intelligence Operations and the Office of the Assistant Chief of Police for Uniformed Operations. The most recent reorganization added the Office of the Assistant Chief of Police, for Standards and Training Operations.

In conjunction with the overall assessment of sworn USB and OSB staffing the Department contracted out after January 6, 2021, mentioned above, the contractor found that the PRLs were more than 2 years old and did not “fully reflect the current mission load of the respective units in the Division. Further, the current daily assignment sheets do not align with the Post Requirements List nor do they appear to capture the full daily deployment of officers.” The

contractor concluded that they could not reconcile mission load and staffing to confirm whether the number of assigned officers meets the operational mission load of the Division, and they could not determine if the individual units were properly staffed. As part of the USB Strategic Action Plan, the contractor made the following two recommendations:

- Conduct a review of all posts on each Post Requirement List with the goal of closing posts that do not support the core mission or are determined to be underutilized per pedestrian counts or by other objective measures.
- Lock all Post Requirement Lists. Additional posts can only be added upon the approval of the Assistant Chief of Police/Chief of Operations.

OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with our *Annual Performance Plan Fiscal Year 2023*, dated November 2022, the Office of Inspector General (OIG) conducted a performance audit of the USCP sworn resource allocation. Our scope included controls and processes in effect as of December 31, 2022. In some cases, we reviewed controls and processes that occurred after December 31, 2022, because it was the most recently available information at the time of our work. OIG objectives for the performance audit of USCP's sworn resource allocation were to determine if the Department (1) established adequate internal controls and processes for ensuring compliance with select Department policies, and (2) complied with select policies and procedures, laws, regulations, and best practices.

To determine adequate controls and processes, we interviewed Department personnel, reviewed prior work performed by the Department, researched and reached out to other law enforcement agencies, reviewed and analyzed documentation provided by the Department, and researched the Department's intranet, PoliceNet, and law enforcement data for applicable guidance. To determine compliance with USCP requirements, we reviewed USCP directives and SOPs. Additionally, we reviewed prior work OIG performed related to sworn resource allocation.

We conducted this performance audit in Washington, D.C., from January 2023 through March 2024, in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence that will provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

On May 22, 2024, we provided a draft copy of this report to Department officials for comments. See Appendix A for a complete list of recommendations. OIG incorporated Department comments as applicable and attached their response to the report in its entirety as Appendix B.

RESULTS

Lack of Post Requirement List Reviews

The Department did not have an effective process in place for reviewing and evaluating PRLs on an annual basis, preparing memorandums that requested changes to PRLs, and maintaining a change log.

SOP [REDACTED] dated September 26, 2017, requires that Bureau Commanders “Conduct an annual review of all PRLs under your command to evaluate current operations and make any necessary recommendations to increase effectiveness and efficiency.” SOP [REDACTED] lists the following as a responsibility of the Division Commander:

When post additions/deletions/modifications are identified within your command, request changes through a memorandum to the COO [Chief of Operations] outlining the rationale for the changes. The memorandum should include the following:

- (a) Overview – The specific post, the hours of operation, and the justification for the change
- (b) Impact on Section Operations – Staffing levels, estimated overtime expenditures, etc.
- (c) Additional Opportunities – Cost offsets, modifications to increase efficiency, etc.

According to SOP [REDACTED], the Office of the Chief of Operations must “Maintain a PRL change log of approved revisions to the PRLs.”

On February 21, 2023, the Department provided all 11 PRLs that they utilized. Of those 11 PRLs, the Department had not updated 7 since 2019 and 1 since 2017. As noted, SOP [REDACTED] states that PRLs are lists of required posts for each section within the bureaus of the Assistant Chiefs of Police. As mentioned, the SOP requires that Bureau Commanders “Conduct an annual review of all PRLs under your command to evaluate current operations and make any necessary recommendations to increase effectiveness and efficiency.” OIG requested evidence of the annual reviews for Calendar Years (CYs) 2021 through 2022, however, the Department was only able to provide evidence of one annual review from the 2 years requested. The Department utilizes 11 PRLs among the Uniformed Services Bureau, Command Division, and Special Operations Division. In a 2-year period, we would therefore have expected 22 annual reviews; however, the Department was only able to provide one. In response to the request, the Department stated that “annual reviews were not conducted from 2020-2022 . . . due to building closures as a result of COVID and January 6th.”

According to a Department official in February 2023, PRLs are difficult to maintain, not user-friendly, and challenging to transition from one custodian to another. The files are arduous and incorporate National Finance Center (NFC) data, Officer Voluntary Reassignment Program (OVRP) information, and have complex equations, formulas, and links. The Department should consider creating a basic guide or desk procedures that would ease the transition to a new custodian. To allow for sufficient training time, it would also be beneficial for custodians to overlap at least briefly when the responsibilities shift to a new custodian.

GAO's *Standards for Internal Control in the Federal Government*, dated September 2014, states that "Documentation is a necessary part of an effective internal control system . . . Documentation is required for the effective design, implementation, and operating effectiveness of an entity's internal control system." With regard to documentation of responsibilities, GAO states in the standards, "Those in key roles for the unit may further define policies through day-to-day procedures, depending on the rate of change in the operating environment and complexity of the operational process . . . Management communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities." The standards further state, "Management develops and maintains documentation of its internal control system. Effective documentation assists in management's design of internal control by establishing and communicating the who, what, when, where, and why of internal control execution to personnel. Documentation also provides a means to retain organizational knowledge and mitigate the risk of having that knowledge limited to a few personnel . . . Documentation of controls, including changes to controls, is evidence that controls are identified, capable of being communicated to those responsible for their performance, and capable of being monitored and evaluated by the entity." It additionally states that "Management defines contingency plans for assigning responsibilities if a key role in the entity is vacated without advance notice."

Division Commanders are required to request additions, deletions, and modifications to posts through a memorandum to the Chief of Operations, according to SOP [REDACTED]. OIG requested memoranda for the 2-year period ending December 31, 2022. We expected numerous requests for additions, deletions, and modifications to posts because of the impact of Covid-19 and the events of January 6, 2021, both of which occurred during the testing period. On April 5, 2023, the Department responded they were unable to provide any memoranda, stating, "The ACOPs [Assistant Chief of Police] Office has indicated that PRLs are now being updated due to the return of normal operations and the Divisions are creating memos to address additions or deletions so they are properly documented. We do not at this time have any current approved memos to provide since they are working their way through the divisions while we are updating PRLs."

In conjunction with OIG testing, we requested change logs covering the 2-year period ending December 31, 2022. According to SOP [REDACTED], the Office of the Chief of Operations is required to maintain a PRL change log of approved revisions to the PRLs. On April 5, 2023, the Department provided OIG with the change log. We noted that the Department last logged an entry to the log in February 2020. Prior to 2020, there were 86 changes recorded in the log from 2016 through 2019. When OIG inquired about the change log, the Department stated, "During the time of the pandemic and January 6, the buildings were closed to the public, posts were closed, modified, and added in relation to the threat environment. PRLs were not being updated during that time as the changes were frequent and at times there were outside agencies assisting in the securing of the Grounds post-January 6."

Without up-to-date PRLs, the Department lacks comprehensive documentation of mission requirements. Such a condition could not only impact the ability to make staffing and budgeting decisions and may affect USCP's ability to respond to shifting priorities but also increase inefficiencies and create ambiguity.

Recommendation 1: We recommend that the United States Capitol Police enforce the procedures outlined in Standard Operating Procedure [REDACTED], dated September 26, 2017. Specifically, the Department should conduct annual reviews of Post Requirements Lists, document requested changes to Post Requirements Lists in memorandums, and maintain a change log.

Recommendation 2: We recommend that the United States Capitol Police document the procedures for implementing, maintaining, and updating the Post Requirements Lists to retain organizational knowledge and facilitate accountability.

Opportunities to Civilianize Sworn Administrative Positions

The Department has opportunities to civilianize sworn administrative positions in order to redirect sworn resources to critical areas and recognize cost savings. The International Association of Chiefs of Police's (IACP) *Best Practices Guide, Budgeting in Small Police Agencies*, states, "In some agencies, sworn officers have been assigned to positions in which a civilian employee could perform the same duties at a reduced cost. Civilianization enables departments to reduce the cost of service delivery through lower salaries. At the same time, highly trained sworn personnel can be redirected to enforcement positions."

Additionally, the Department of Justice (DOJ) Office of Community Oriented Policing Services, Program on Police Consolidation and Shared Services' report, entitled *Integrating Civilian Staff into Police Agencies* states, "Civilian employees can offer police agencies a number of benefits. First, they are less expensive than sworn officers in terms of salary, retirement, and benefits . . . Second, civilians enable sworn officers to concentrate on a narrower range of functions . . . Third, civilians bring specialized skills or formal training that regular sworn officers might not possess, such as formal engineering, legal, or scientific training".

OIG has made recommendations for civilianizing certain administrative positions in several recent reports. For example, in the June 2016 report, *Analysis of United States Capitol Police Internal Post Assignments*, OIG concluded that the Department could civilianize 60 positions within the Command Center and Communications Section, saving the Department approximately \$2.2 million in salaries and benefits.

In June 2022, OIG issued a report, entitled *Review of United States Capitol Police Communications Section's Dispatch and Call Taking Process*, in which OIG recommended that the Department staff all Dispatcher positions with civilian employees. Because Dispatcher duties do not include responsibilities requiring police powers, civilianizing the remaining Dispatcher positions held by officers would help alleviate sworn staffing shortages.

Additionally, OIG made similar recommendations in two earlier reports. OIG recommended realigning DPD sworn officers performing administrative functions with civilian positions in a September 2013 report, entitled *Evaluation of Dignitary Protection Division*. The goal was a more efficient use of resources and cost savings for the Department. In the OIG's March 2014 report, *Performance Audit United States Capitol Police Controls Over Ammunition*, OIG made a

recommendation for the Department to reassign a trained Property Asset Management Division employee to the Physical Skills Division Armory to ensure an accurate perpetual inventory. The recommendation further stated that this would relieve sworn officers of administrative duties and allow them to conduct critical law enforcement functions.

Research into civilianization of administrative positions in law enforcement agencies indicates a long-standing trend toward increased civilianization of those roles. Recent industry-wide staffing, recruiting, and retention challenges would expedite the rate of change. The 2019 IACP report, *The State of Recruitment: A Crisis for Law Enforcement*, detailed such concerns prior to the Covid-19 pandemic and January 6. According to the DOJ Office of Justice Programs, Bureau of Justice Statistics, as of December 2020, the more than 14,700 U.S. general-purpose law enforcement agencies employed approximately 708,000 full-time sworn officers and 348,000 full-time civilians, for a rate of 67 percent sworn and 33 percent civilian. By contrast, as of June 2023, USCP had 2,404 employees, with 83 percent sworn and 17 percent civilians.

The rates of sworn-to-civilian employees at individual police agencies can vary significantly. A 2014 DOJ Community Oriented Policing Services report, entitled *Integrating Civilian Staff into Policing Agencies*, stated that in 2008, 65 percent of full-time employees of a local police department in Texas were civilians, while another local police department in Maryland had 0.3 percent civilians. OIG reached out to other Federal law enforcement agencies and according to the United States Secret Service's (USSS) website, as corroborated by a former USSS Deputy Assistant Director for Special Intelligence and Information, the agency is about 69 percent sworn and 31 percent civilian. According to a former Federal Bureau of Investigation (FBI) Unit Chief, we found that as of FY 2023 the agency was roughly comprised of 38 percent sworn employees and 62 percent civilians. The Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) employs about 48 percent special agents and 52 percent civilians, according to its FY 2023 budget request. Additionally, according to an official of the United States Park Police (USPP) Office of the Chief Executive Officer, 86 percent sworn employees and 14 percent civilian employees are authorized for the agency. Sworn officers are in greater demand at USCP compared to other Federal agencies because of a mission that focuses on protection and screening.

Civilians can perform an extensive variety of administrative functions required by police agencies. According to the DOJ report, those functions and tasks include:

- Clerical, accounting, reception, dispatch, maintenance, custodial, detention, and technical duties
- Crime scene processors and forensic crime lab employees
- Crime victim service providers in the field
- Analysts, researchers, and planners
- Community liaisons and public information officers
- Command staff and strategic leaders

OIG compiled a list of roles the Department could consider civilianizing and requested that the Department review it. The list of 84 positions was derived from research into roles typically staffed by civilian employees in law enforcement agencies. Of the 84 positions, the Department

responded that it thought the Department could civilianize two positions within the Office of Background Investigations and Credentialing, Badging and Credentialing Division (OBIC-BCD). OIG determined that as of CY 2022, the average gross pay for a sworn employee was \$133,558, and the average gross pay for a civilian employee was \$118,395. Therefore, by moving just two sworn OBIC employees to an area with a critical need and replacing them with civilians, the Department would save over \$30,000 annually. That amount is categorized as “funds put to better use,” meaning “funds could be used more efficiently if management of an establishment took actions to implement and complete the recommendation,” according to the Inspector General Act Amendments of 1988, Public Law 100-504. The Department would also save on the training costs associated with becoming an officer, a lengthy and expensive investment. Civilian benefits are not as costly as sworn benefits, meaning additional cost savings for the Department.

The Department also has the opportunity to magnify its cost savings if they can progress toward raising the ratio of civilian employees from 17 percent closer to the national average of 33 percent for general purpose law enforcement agencies. The cost savings could be as much as \$5.8 million annually. OIG based this calculation on the assumption that of the 2,404 total employees as of June 2023, 33 percent, or 793 employees were civilians instead of 408, which was the actual number of civilians at that time. The savings are for salaries only and do not include additional savings associated with training costs for sworn officers and less costly civilian benefits. As stated earlier, although some Federal law enforcement agencies have civilian rates higher than 33 percent, USCP’s protective mission is such that the agency may not be able to civilianize as much as those agencies.

Hiring civilian employees is less involved and less costly than hiring sworn personnel. Although civilians must go through background checks and security clearance procedures, the hiring process is longer and more in depth for sworn officers. Officers are required to complete basic law enforcement training and pass exams and physical and mental health evaluations. According to the cited IACP report, 78 percent of law enforcement agencies reported having difficulty recruiting qualified candidates. Additionally, approximately 30 percent of those agencies reported experiencing moderate to major challenges recruiting non-sworn positions.

Based on discussions with Department personnel, USCP has made progress toward civilianizing sworn positions in the Command Division. As stated, the Department does, however, have additional opportunities to civilianize administrative positions held by sworn employees, and opportunities exist for utilizing sworn resources in a more efficient and effective manner. At a time when the Department is facing unprecedented staffing shortages, transitioning the two OBIC positions as well as other civilian positions from sworn to civilian roles could help to alleviate sworn staffing challenges.

Recommendation 3: We recommend that the United States Capitol Police redirect Office of Background Investigations and Credentialing sworn resources who are performing administrative tasks to other critical areas and fill those positions with qualified civilians. Additionally, we recommend that the United States Capitol Police consider civilianizing additional administrative positions currently held by sworn employees.

Outdated Policies

The Department's policies and procedures for PRLs are out of date. GAO's *Standards for Internal Control in the Federal Government*, dated September 2014, states that, "Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks." The GAO standards also state that, "Management communicates to personnel the policies and procedures so that personnel can implement the control activities for their assigned responsibilities."

During our review of SOP [REDACTED] dated September 26, 2017, we noted that the policy referenced the Chief of Operations (COO). In January 2024, the Department underwent a reorganization that renamed or split off several organizations. Prior to the reorganization, the Department had two Assistant Chiefs, and prior to a 2019 restructuring, the Department had one Assistant Chief. The Department shifted from one Assistant Chief who held the title COO to an organizational structure with two Assistant Chiefs as part of the October 2019 restructuring. As of April 2024, however, the structure has three Assistant Chiefs—one for the Office of the Assistant Chief of Police for Protective and Intelligence Operations, one for the Office of the Assistant Chief of Police for Uniformed Operations, and one for the Office of the Assistant Chief of Police for Standards and Training Operations. The issue of this outdated SOP was noted in the April 2023 OIG report OIG-2023-05, *Analysis of Outdated Standard Operating Procedures and Directives*. In the report OIG stated, "The Department confirmed that the title of COO is no longer used by USCP, and one of the two Assistant Chiefs of Police now fills this role for each corresponding office." Outdated policies and procedures can increase process inefficiencies, create ambiguity, and impede the effectiveness of the Department. Additionally, the use of outdated structure can cause confusion with new employees who are not familiar with the past structure.

The SOP defines the PRL as "the list of required posts for each section within the bureaus of the COO." We noted, however, that during our testing only some sections use PRLs. Of the 16 divisions under the Assistant Chiefs of Police—the Capitol Division, House Division, Library Division, Senate Division, Command Division, and the Special Operations Division—6 use PRLs. The Department provided staffing or organizational charts for all but one section that did not employ a PRL. Without up-to-date PRLs, the Department lacks comprehensive documentation of mission requirements. Such a condition could negatively impact the Department's ability to make staffing and budgeting decisions and may affect its ability to respond to shifting priorities. Additionally, this may increase inefficiencies and create ambiguity.

Recommendation 4: We recommend that the United States Capitol Police review and update Standard Operating Procedure [REDACTED], dated September 26, 2017. At a minimum, the Standard Operating Procedure should reflect the current organizational structure and redefine Post Requirements Lists to reflect actual Department use.

APPENDICES

List of Recommendations

Recommendation 1: We recommend that the United States Capitol Police immediately enforce the procedures outlined in Standard Operating Procedure [REDACTED], dated September 26, 2017. Specifically, the Department should conduct annual reviews of Post Requirements Lists document requested changes to Post Requirements Lists in memorandums, and maintain a change log.

Recommendation 2: We recommend that the United States Capitol Police document the procedures for implementing, maintaining, and updating the Post Requirements Lists to retain organizational knowledge and facilitate accountability.

Recommendation 3: We recommend that the United States Capitol Police redirect Office of Background Investigations and Credentialing sworn resources who are performing administrative tasks to other critical areas and fill those positions with qualified civilians. Additionally, we recommend that the United States Capitol Police consider civilianizing additional administrative positions currently held by sworn employees.

Recommendation 4: We recommend that the United States Capitol Police immediately review and update Standard Operating Procedure [REDACTED] dated September 26, 2017. At a minimum, the Standard Operating Procedure should reflect the current organizational structure and redefine Post Requirements Lists to reflect actual Department use.

Department Response



PHONE: 202-224-6808

UNITED STATES CAPITOL POLICE

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

June 5, 2024

COP 230123

MEMORANDUM

TO: David T. Harper
Inspector General

FROM: J. Thomas Manger
Chief of Police

SUBJECT: Response to Office of Inspector General draft report *Performance Audit of Sworn Resource Allocation* (Report No. OIG-2024-06)

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendations contained within the Office of Inspector General's (OIG) draft report *Performance Audit of Sworn Resource Allocation* (Report No. OIG-2024-06).

The Department generally agrees with all of the recommendations and appreciates the opportunity to work with the OIG to further improve upon the policies and procedures in place for the management of its sworn resources. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect in order to achieve long term resolution of these matters.

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 that reads "Jason R. Bell".

For: J. Thomas Manger
Chief of Police

cc: Ashan M. Benedict, Assistant Chief of Police for Protective & Intelligence Operations
Jason R. Bell, Assistant Chief of Police for Standards and Training Operations
Sean P. Gallagher, Assistant Chief of Police for Uniformed Operations
Magdalena Boynton, Chief Administrative Officer
[REDACTED] Program Manager/Audit Liaison

