



INSPECTOR GENERAL

UNITED STATES CAPITOL POLICE

WASHINGTON, DC 20510

August 6, 2025

**MEMORANDUM**

**TO:** Michael G. Sullivan  
Chief of Police

**FROM:** David T. Harper  
Inspector General 

**SUBJECT:** *Management Advisory Report: Security Services Bureau Noncompliance with Key Control Procedures and Outdated Policies and Procedures (Report Number OIG-2025-11)*

In accordance with our annual plan, the United States Capitol Police (USCP or Department) Office of Inspector General (OIG) completed an analysis of the Security Services Bureau (SSB). OIG objectives were to determine if SSB has (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 including to prevent or detect the clandestine interception of sensitive, classified, or private information. The scope of the analysis included existing policies and procedures related to SSB. Due to the nature of the work, OIG determined that this report format was most appropriate to communicate the results to USCP management. OIG will communicate other matters related to SSB in our reports related to the Inspection of the Duress System and the Evaluation of USCP's Video Retrieval and Preservation Procedures.

USCP was not complying with their Standard Operation Procedure (SOP) [REDACTED] [REDACTED] dated June 22, 2009, which requires a semi-annual audit of issued keys. USCP maintains high security locks and keys that are used to physically secure sensitive areas of the Capitol Complex. Examples include perimeter doors, police kiosks, [REDACTED].

Authorized key holders are issued a key or keys for high security locks for their own official use or for official use by a subordinate. Individuals who are authorized as key users are authorized to possess and use high security keys as required by their job function. [REDACTED]

[REDACTED] Authorized key users obtain keys from the [REDACTED] when needed. SOP [REDACTED] states that USCP should, "Conduct a semi-annual audit of all issued keys to ensure and document the possession of all keys issued to each Key Holder." However, a Department official informed the OIG that the restrictions placed by COVID-19 prevented the audit from taking place since November 2021. As of July 2025, the Department had not resumed the semi-annual audit of the master keys and post keys.

The OIG reviewed SSB's policies and procedures concerning physical security and technical security countermeasures (TSCM) operations. Specifically, components of physical security and TSCM operations such as equipment, security cameras, [REDACTED] key control, and network security. At the outset of this analysis, certain SSB policies and SOPs were outdated and did not reflect current operational practices. In July 2025, the Associate Director of Technical Countermeasures Division, informed the OIG that all but one Standard Operating Procedure (SOP) was in the process of rescindment. SSB plans to replace these SOPs with three Internal Operating Procedures (IOP). The remaining SOP is [REDACTED] dated March 1, 2014. Six of the Technical Countermeasures Division's SOPs have not been updated since 2008.

The following policies are in the process of rescindment upon the issuance of three new IOPs:

- Standard Operating Procedure (SOP) [REDACTED] dated June 6, 2008.
- SOP [REDACTED] dated June 6, 2008.
- USCP SOP [REDACTED] dated October 26, 2015

**Recommendation 1:** We recommend the United States Capitol Police complete a semi-annual audit of all issued keys in compliance with Department Standard Operating Procedure, [REDACTED], dated June 22, 2009 and ensure the accountability of all keys.

**Recommendation 2:** We recommend the United States Capitol Police review and update the following Security Services Bureau Standard Operating Procedures to reflect current operations or rescind them and replace them with Internal Operating Procedures that reflect current operations:

- USCP Standard Operating Procedure (SOP) [REDACTED] dated June 6, 2008.
- USCP SOP [REDACTED] dated June 6, 2008.
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- USCP SOP [REDACTED] dated June 6, 2008.
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- USCP SOP [REDACTED] dated October 26, 2015.

We conducted this work with integrity, objectivity, and independence as required by the *Quality Standards for Federal Offices of Inspector General* issued by the Council of the Inspectors General on Integrity and Efficiency (CIGIE). Those standards set forth the overall quality framework for managing, operating, and conducting the work of Offices of Inspector General. The work adhered to the professional standards of objectivity, independence, due professional care, and quality assurance and followed procedures to ensure accuracy of the information presented.

cc: Acting Assistant Chief Jeanita Mitchell, Protective and Intelligence Operations  
Assistant Chief Sean P. Gallagher, Uniformed Operations  
Assistant Chief Ashan M. Benedict, Standards and Training Operations  
Ms. Magdalena Boynton, Chief Administrative Officer  
[REDACTED] Audit Liaison