



# UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

## Independent Accountants' Report on Agreed-Upon Procedures of United States Capitol Police Leave Restriction Status

Report Number OIG-2015-09

September 2015

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# ***UNITED STATES CAPITOL POLICE***



## ***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. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and review of applicable documents.

We developed our recommendations based on the best knowledge available to OIG and discussed the 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.

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

Fay F. Ropella, CPA, CFE  
Inspector General



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## Abbreviations

Agreed-Upon Procedure	AUP
Collective Bargaining Agreement	CBA
District of Columbia	DC
Leave Restriction Status	LRS
Office of Human Resources	OHR
Office of the Inspector General	OIG
Standard Operating Procedure	SOP
Uniform Services Bureau	USB
United States Capitol Police	USCP or the Department

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## EXECUTIVE SUMMARY

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As the United States Capitol Police (USCP or the Department) works toward achieving efficiency and effectiveness of its programs as well as reducing costs, the Assistant Chief of Police requested that the Office of Inspector General (OIG) conduct agreed-upon procedures (AUPs) related to Leave Restriction Status (LRS). OIG engaged Cotton and Company, LLP to assist in determining the adequacy, effectiveness, and efficiency of policies, procedures, and practices regarding the Department's LRS process. In addition, we identified best practices for improving upon processes in effect as of June 30, 2015.

To gain an understanding of the policies and procedures, we obtained USCP's applicable directives, Standard Operating Procedures (SOPs), and Collective Bargaining Agreements (CBA) for sworn officers and civilian personnel. We also conducted interviews with USCP personnel, consisting of: two deputy chiefs, two lieutenants, four sergeants, and a Human Resources Specialist.

Unscheduled leave negatively affects the Department and its personnel. The use of unscheduled leave creates staff shortages that can ultimately result in the need for overtime, which, in turn, can deplete budgetary resources. From a personnel standpoint, it affects the morale of employees<sup>1</sup> who must work extra shifts to provide coverage. A designation in LRS is a tool used for reducing leave abuse by requiring that an employee provide documentation whenever taking unscheduled time off, whether the result of sick leave or other reasons. According to Article 19 of the CBA for sworn officers, USCP supervisors may place an officer in LRS when a pattern of six days of unscheduled leave surfaces without documentation or other questionable circumstances within a 6-month period.

The Department had control weaknesses related to the LRS process. Specifically, Department Directives and SOPs were outdated and not adequate with respect to LRS, leading to inconsistent monitoring. As a result, the Department did not consistently identify leave abuse offenders. The condition occurred as a result of inconsistent understanding and application of the process. Neither the Department nor CBA guidance provided instructions for consistent monitoring of leave restriction. For example, USCP did not regularly perform leave audits, which might have identified additional candidates for LRS. A continuous rolling 6-month period and leave audits also would have assisted in monitoring and ensuring uniformity throughout the Department. Communication was not adequate between elements within the Department and supervisors related to LRS decisions. The Department did not have a timeline for notifying supervisors when final LRS decisions were complete or when the Office of Human Resources (OHR) sent LRS

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<sup>1</sup> "Employee(s)" can be either or both civilians or sworn.

memoranda to employees. Effective communication would have provided more transparency to the process.

The Department did not have a coordinated approach to efficiently process and effectively monitor the LRS process. Supervisors must be aware of the additional level of effort required for submitting a request for LRS. Lack of planning can influence a supervisor's decision to proceed with an LRS request. Furthermore, implementing additional penalties and progressive restrictions for LRS may deter unscheduled absences as well as promote appropriate behavior of employees.

Several best practices were identified that could improve Department performance related to LRS, such as training for employees and supervisors, better communication through a pre-LRS memorandum notifying both employees and supervisors of LRS decisions and consequences, and independent verification of healthcare consultations.

USCP has been considering how to improve the program, including possibly requiring strict documentation for unscheduled leave use and a graduated program of monitoring and discipline. To develop more efficient and effective controls over accountability and transparency of LRS, we recommend that the Department immediately develop detailed guidance and training for employees and supervisors informing both of responsibilities related to communication, monitoring, and consequences of abusing leave. Issuing a pre-leave restriction memorandum to each employee who might be in danger of placement on LRS could serve as a warning notice that leave restriction may be forthcoming, which could assist in curtailing leave abuse offenders. See Appendix A for a complete list of OIG recommendations.

OIG provided a draft report for comment on September 21, 2015, and conducted an exit conference with Department officials on September 28, 2015. We incorporated the Department's comments as applicable and attached their response to the report in its entirety in Appendix B.

## **BACKGROUND**

As the United States Capitol Police (USCP or the Department) works toward achieving efficiency and effectiveness of its programs as well as reducing costs, the Assistant Chief of Police (ACOP) requested that the Office of Inspector General (OIG) apply agreed-upon procedures (AUPs) to its Leave Restriction Status (LRS) process.

According to the Collective Bargaining Agreement (CBA) between the Fraternal Order of Police and USCP effective June 8, 2010, the Department may place a sworn officer with a pattern of leave abuse in LRS, which requires that, going forward, he or she must provide documentation for each use of unscheduled leave. The action may occur after six occurrences of leave abuse within a 6-month period and after required counseling. According to the CBA—

After becoming familiar with the bargaining unit employee's record, the supervisor will hold a counseling interview with the officer if there is reason to suspect leave abuse. The counseling interview will enable the supervisor to:



- A. Let the bargaining unit employee know that the supervisor is aware of and concerned about the employee's leave habits;
- B. Ascertain whether or not there is a health problem, unusual physical condition or other personal circumstance which is contributing to the bargaining unit employee's absenteeism;
- C. Provide individual advice and instruction to the bargaining unit employee concerning the unscheduled leave regulations and determine if they may have misunderstood them. If necessary, caution the employee against improper leave practices, and remind him of the penalties for abusing the unscheduled leave regulations.
- D. Make a notation in the [REDACTED] that the bargaining unit employee has been counseled on unscheduled leave usage.

According to supervisors, sergeants and lieutenants record instances of unscheduled leave in an employee's unit jacket and initiate an LRS request for any employee who exceeds the six occurrences.

According to the CBA between USCP and the International Brotherhood of Teamsters (Local Union No. 639) dated May 2014, the Department also may place a civilian employee on leave restriction if, after appropriate counseling, that employee is suspected of misuse of unscheduled leave.

The Office of Human Resources (OHR) maintains a list of current and previous employees in LRS using an Excel spreadsheet.

## **OBJECTIVES, SCOPE, AND METHODOLOGY**

OIG engaged Cotton and Company, LLP to assist in conducting an independent AUP engagement. With ACOP concurrence, OIG agreed to conduct procedures evaluating its policies and procedures as well as identify best practices with regard to LRS as shown in Appendix C.

Our methodology consisted of obtaining an understanding of the USCP Standard Operating Procedures (SOPs), determining the monitoring processes and identifying best practices. To gain an understanding of the following, we reviewed USCP policies and procedures, and conducted nine interviews from August 5, 2015, through August 23, 2015, with USCP personnel involved in the leave restriction process.

- Current process for recommending an employee for LRS
- Monitoring of employees currently or formerly on LRS
- Disciplinary action taken for repeat offenders
- Improvements that should be implemented to enhance the effectiveness of LRS

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[REDACTED] dated October 2011.

To gain an understanding of the leave restriction process, we reviewed the following applicable policies and SOPs:

- USCP Directive [REDACTED] (undated)
- SOP No. [REDACTED] (April 10, 2007)
- Collective Bargaining Agreement (CBA), Article 19 for Sworn Officers
- CBA, Article 18 for Civilians

We conducted interviews with USCP personnel, consisting of: two deputy chiefs, two lieutenants, four sergeants, and a Human Resources Specialist.

We researched guidance from the Government Accountability Office, other Federal agencies, and available law enforcement-related information to determine industry best practices regarding leave restriction.

We conducted the AUPs in Washington, D.C., from August 2015 through September 2015. We conducted our work in accordance with the American Institute of Certified Public Accountant's *Statements on Standards for Attestation Engagements* and *Government Auditing Standards* issued by the Comptroller General of the United States. The sufficiency of the procedures is solely the responsibility of parties specified in this report. Consequently, we make no reference regarding the sufficiency of the procedures for either the purpose for which this report was requested or any other purpose.

We were not engaged to and we did not conduct an examination, the objective of which would be the expression of an opinion on USCP's program for LRS or the adequacy of the related internal controls. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that we would have reported.

~~This report is intended solely for the information and use of the management of USCP, Capitol Police Board, and Members of the United States Congress, and is not intended to be and should not be used by anyone other than these specified parties.~~

On September 21, 2015, we provided a draft report for comment, and on September 28, 2015, we conducted an exit conference with Department officials. We incorporated the Department's comments as applicable and attached their response to the report in its entirety in Appendix B.

## Results

### Leave Restriction Status Control Weaknesses

The Department had control weaknesses related to LRS. Specifically, Department Directives and SOPs were outdated and insufficient with respect to LRS, which led to inadequate monitoring. Several best practices were identified that could improve Department performance related to LRS, such as training for employees, communication through a pre-LRS memorandum, and independent verification of healthcare consultations.

### Outdated and Insufficient Leave Restriction Guidance

Department guidance on LRS was outdated and not sufficient. The Department should include specific or detailed instructions in its guidance on how to calculate LRS and establish a timeline for issuing LRS decisions and memoranda.

#### Outdated Guidance

The Department's guidance was outdated. Some of the policies included as part of Directive [REDACTED] dated as far back as 1989 and did not provide guidance on LRS. The directive states that its effective date is "per attached policies" and the review date is "in progress." The Directive also states that, "Upon completion of the Directive review process, the content in the attached Directives will be reissued in the new Written Directive System format."

SOP [REDACTED] provides general instructions for supervisors on procedures for requesting employee placement in LRS. When suspecting a pattern of leave abuse, a supervisor reviews the employee's records, provides counseling, and submits LRS-supporting documentation for concurrence as follows:

**Supervisor → Division Commander → Bureau Commander → Director OHR**

According to the SOP, OHR issues a memorandum informing an employee of placement in LRS. The memorandum specifies that LRS will remain in effect for "a designated period of time." Once placed in LRS and while in that status, the employee must provide medical certification or documentation when taking sick leave or unscheduled time off from work. In the absence of up-to-date and sufficient guidance, employees and supervisors are not always aware of expectations and potential consequences of the placement in LRS.

#### Insufficient Guidance

The Department guidance related to LRS was not sufficient. Neither the Department's guidance nor the CBA outlines LRS procedures for calculating and auditing LRS days or communicating decisions or LRS memoranda.

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<sup>3</sup> "Employee(s)" can be either or both civilians or sworn.

The CBA states—

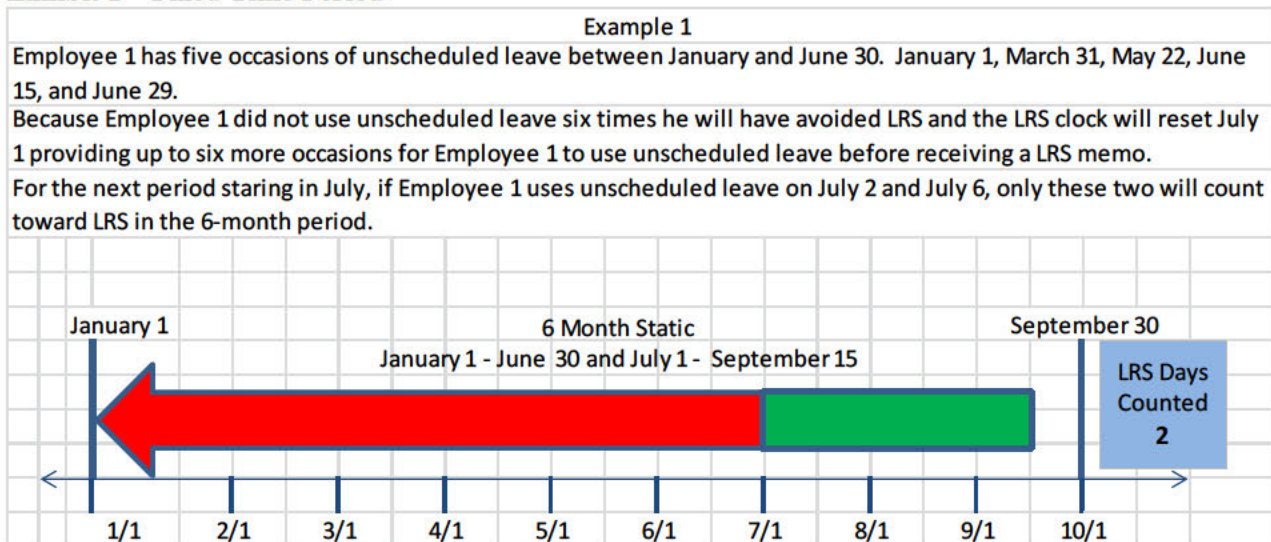
When an officer uses six (6) occurrences of unscheduled leave without documentation in an established pattern, under questionable circumstances and/or evidences a correlation between unscheduled leave usage and days off/holiday or other similar circumstances within six (6) months preceding the current use of unscheduled leave, the officer will be recommended for Leave Restriction Status.

The guidance contains no further discussion on how to continue monitoring LRS cases.

In an effort to monitor LRS offenders, some supervisors conduct semi-annual leave audits for their squads. The practice, however, is at the discretion of the supervisor. Such a practice could have resulted in a disparity of treatment of employees because some supervisors were more diligent in monitoring offenders. A written requirement to conduct and report quarterly or semi-annual audits of unscheduled leave would assist in monitoring and ensure uniformity throughout the Department as well as equality of employees.

Supervisors also need additional criteria on how to maintain vigilance over LRS cases and consistently calculate LRS days, rather than restarting the count each 6-month period, which could prevent further abuse during the following 6-month period. Reviewing the previous 6-month period from the date of each infraction would provide a mechanism for continuous monitoring, as you would always be looking at the previous 6-months. The example in Exhibit 1 displays the same unscheduled leave scenario, but uses a fixed period versus use of a rolling period shown in Exhibit 2.

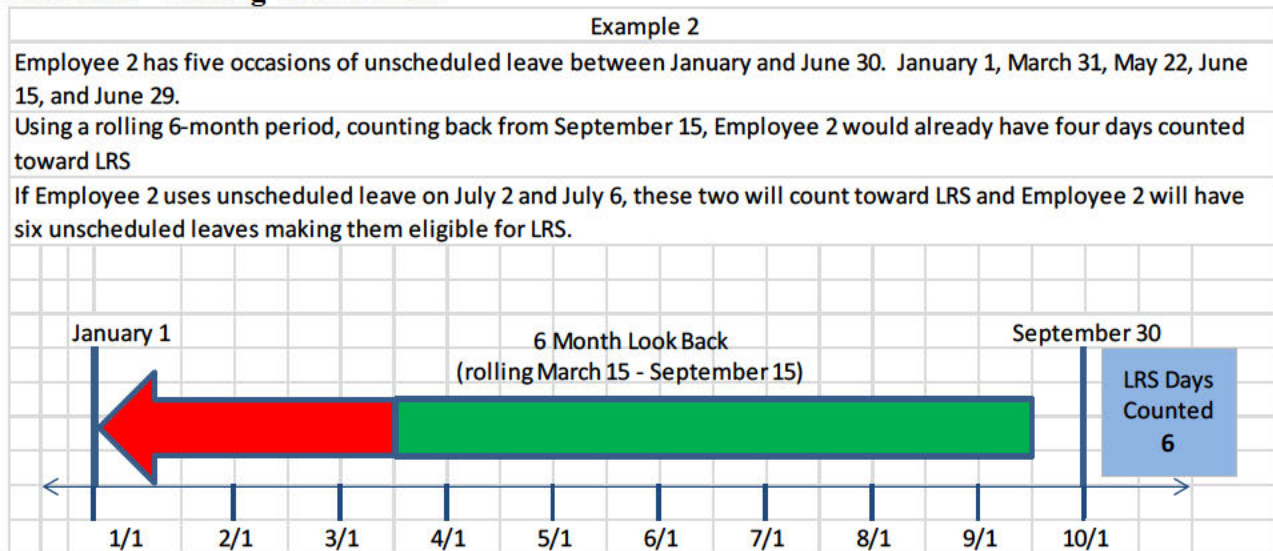
#### Exhibit 1 – Fixed Time Period



Source: OIG graphic.



## Exhibit 2 – Rolling Time Period



Source: OIG graphic.

Based on information obtained in interviews, supervisors use Form [REDACTED] for instances of unscheduled leave, which are filed within an officer's unit jacket for 1 year from the last instance before being purged. Some supervisors conduct semi-annual leave audits for their squads. However, such a practice is at the discretion of the supervisor (lieutenant/sergeant). Formal written guidance requiring a continuous, rolling 6-month period and regularly scheduled leave audits would assist in monitoring and ensuring uniformity throughout the Department.

## Inadequate Communication

The Department did not adequately communicate the status of LRS requests. The Department did not identify in guidance any timelines for notifying supervisors of final decisions or employees of placement in LRS. The process for completing a review of an employee's leave use and submitting the documentation through the chain of command for approval can take significant time. During the time that leave restriction paperwork routes through the various layers of approval and pending placement in LRS, the employee could have additional occurrences of unscheduled leave. The additional occurrences would not count against the employee, and the employee would need to furnish documentation for the absences. One sergeant we interviewed was aware of multiple cases in which a supervisor took the time to recommend an employee for LRS, but the supervisor never heard anything regarding a final decision. Written procedures providing a timeline would not only let supervisors monitor the progress of an LRS request but also provide transparency.

## Conclusions

The Department had outdated policies and procedures, lacked detailed written policies and procedures for calculating unscheduled leave absences within the 6-month period, and needed a timeline to communicate the status of LRS requests and memoranda. Thus, OIG makes the following recommendations.

**Recommendation 1:** We recommend that the United States Capitol Police complete its review of all guidance related to Leave Restriction Status, make necessary updates, and reissue in the proper format to provide adequate instructions for Leave Restriction Status as it relates to both employees and supervisors.

**Recommendation 2:** We recommend the United States Capitol Police reiterate the current requirement for Leave Restriction Status--six occurrences of unscheduled leave without documentation during a continuous 6-month period, looking at the previous 6-months from the date of the last infraction. In addition, supervisors should conduct regular (semi-annual) reviews of leave records across the Department so supervisors monitor unscheduled leave consistently.

**Recommendation 3:** We recommend the United States Capitol Police include a formal timeline requirement that the Office of Human Resources respond within 10 business days to a request for employee placement into a Leave Restriction Status.

## Inadequate Monitoring of Leave Restriction

The Department did not adequately monitor leave restrictions. The Department also did not have tools available that would help it efficiently process and effectively monitor LRS. Lack of systematic documentation can influence a supervisor's decision to proceed with an LRS request. Additionally, once in the LRS program, no progressive discipline exists to effect a change in behavior.

### No Coordinated Approach of Monitoring

The Department did not have a coordinated approach, or any other electronic mechanism as a tool, for centralized monitoring of unscheduled and undocumented leave (potential candidates for LRS). OHR uses an Excel spreadsheet to maintain the list of current and former employees in the LRS program. The spreadsheet reflects the start and end dates of leave restriction. As of August 6, 2015, OHR had nine employees recorded on its LRS spreadsheet. Officials in OHR stated that typically about 10 to 12 employees are in LRS at any given time. Anecdotal evidence obtained from interviews of supervisors suggests that the number of employees in LRS should be more than on the list. For recording occurrences of unscheduled leave, supervisors use a hardcopy of Form [REDACTED], which the supervisor files in the employee's unit jacket. Before OHR will process a

request for LRS and notify an employee, the supervisor must fill out a [REDACTED] each time an employee takes unscheduled leave, hold counseling sessions, and then compile the necessary documentation and submit that documentation through the chain of command. Accordingly, the number of employees who should be on LRS may be greater than what the OHR spreadsheet reports because of the burdensome process. Using a mechanized process as a tool to facilitate and centralize monitoring of unscheduled and undocumented leave would help reduce the burden on supervisors and provide a more accurate reflection of the actual number of employees in risk of leave abuse.

### **Insufficient Progressive Discipline**

Failure to monitor offenders progressively allows leave abuse to continue unabated. Based on interviews with supervisors, sufficient disciplines are not available to supervisors when an officer on LRS fails to show any signs of improvement in behavior. In one instance, an officer has remained in LRS since 2013. That officer could potentially remain in the status indefinitely, with no repercussions for the continuation of unscheduled leave use.

According to CBA, Section 19.03, “an officer may be denied unscheduled leave and/or required to furnish medical certification or other acceptable administrative evidence for all unscheduled absences from work. Failure to provide such evidence may result in any absence being charged as absence without approved leave, and may be grounds for disciplinary action.” As long as an employee provides documentation supporting absences while on LRS, officers (including civilians) are compliant with the provisions of the CBA and the leave restriction memorandum issued by OHR. Yet, nothing is specified concerning the length of time that an employee remains in LRS before the supervisor takes additional disciplinary action, and the current requirements allow leave abuse to continue without further sanctions. With the prevalence of minute clinics and urgent care facilities, documentation is easy to obtain, and the requirement for supporting documentation may simply be a minor inconvenience for employees.

Department officials stated that the LRS policy did not prevent employees from transferring to another unit or affect promotion potential. Department officials stated that unless the acquiring supervisor specifically reviews the employee’s unit jacket at the time of the transfer or promotion, it is likely that previous patterns of leave abuse would go undetected. Preventing transfers or promotions of individuals in LRS would force supervisors to address leave abuse issues, rather than letting the issue become “someone else’s problem.” Other restrictions should be considered, such as prohibiting the trading of shifts or requesting additional duty. The additional restrictions could help motivate employees to avoid LRS.

### **Conclusions**

The current level of supervisory effort needed to monitor potential leave abuse inhibits the effectiveness of the process. A system for monitoring the number of occurrences of unscheduled leave that count toward the LRS requirement did not exist. Supervisors must take the initiative to complete hardcopies of Form [REDACTED] to document each instance of unscheduled leave and then submit supporting documentation through multiple layers of approval. The cumbersome and

tedious process has historically resulted in inconsistencies and inefficiencies in tracking and monitoring instances of potential leave abuse. In addition, progressive disciplinary actions needed to address continued leave abuse were not available, inhibiting the effectiveness of the program. Thus, OIG makes the following recommendations.

**Recommendation 4:** We recommend the United States Capitol Police consider using a mechanized process as a tool for facilitating centralized monitoring of unscheduled and undocumented leave.

**Recommendation 5:** We recommend the United States Capitol Police consider adding progressive discipline for anyone with a continuing pattern of leave abuse such as when an employee or officer is in Leave Restriction Status, that individual is not eligible for promotion or officer-requested transfers. This would serve as a leave abuse deterrent and help avoid patterns going undetected, especially when officers request transfers.

## **Best Practices May Assist in Curtailing Unscheduled Absences**

Based on research of other Federal agencies and the District of Columbia (DC) Metropolitan Police Department, several best practices were identified that could improve the Department's performance related to LRS. Best practices include training for employees, communication through a pre-LRS memorandum, and independent verification of healthcare consultations.

The Department did not have formalized LRS training for new employees or new supervisors (sergeants and lieutenants) related to unscheduled leave monitoring. OHR confirmed that it does not provide any information to recruits or new sworn officers regarding appropriate use of leave and the consequences of leave abuse. According to OHR, the Department neither provides LRS training to new supervisors (sergeant/lieutenant) on how to recognize or respond to leave abuse. Training for new hires and new supervisors with periodic refresher training would be beneficial for all employees as a reminder of the importance regarding appropriate leave use and dealing with issues of leave abuse.

Based on our research, the issuance of a pre-LRS memorandum could prove useful for helping provide notice of the concerns of supervisor. In addition, a pre-LRS memorandum would serve as a notice that further behavior by an employee would result in placement in the LRS program, requiring an employee to produce supporting documentation for unscheduled absences. Such communication through the pre-LRS memorandum could be a tool for supervisors to use before the formal LRS process, which could assist in correcting any deviant behavior and noncompliance with rules.

Another best practice identified was the use of a consulting physician to affirm fitness for duty or verify ailments that are preventing duty. The DC Metropolitan Police Department has medical doctors on staff, and officers are required to visit those doctors when requesting sick time. According to a USCP official, the DC Metropolitan Police requirement has assisted in curtailing



leave abuse problems. While USCP may not be able to implement a program to the extent of the DC police, in cases in which a person has remained in LRS for an extended period, requiring that an LRS employee see an independent physician—such as the attending physician or at one of the USCP-contracted hospitals—could be beneficial.

## **Conclusions**

Best practices provide opportunities for the Department to improve performance. Formal and consistent training to new sworn officers and new supervisors will communicate the Department's expectations about potential leave abuse. In addition, a pre-LRS memorandum would provide supervisors with another tool to assist in modifying employee behavior. An independent doctor's evaluation could provide the Department with additional options for fighting chronic leave abuse. Thus, OIG makes the following recommendations.

**Recommendation 6:** We recommend the United States Capitol Police include a comprehensive discussion of leave procedures and the consequences of abusing leave in its new employee orientation. The Office of Human Resources should provide refresher training to supervisors upon promotion to supervisor, which should cover the topics of interacting with subordinates and monitoring leave. Training should be periodic, thus ensuring that all employees are aware of proper leave practices.

**Recommendation 7:** We recommend the United States Capitol Police consider requiring that supervisors issue a pre-Leave Restriction Status memorandum to employees on the instance of unscheduled leave prior to a formal request for Leave Restriction Status; this will serve as warning notice that leave restriction may be forthcoming and may assist in curtailing leave abuse problems.

**Recommendation 8:** We recommend the United States Capitol Police consider adding a requirement for officers or employees in Leave Restriction Status for more than 1 year to check-in with the United States Capitol Police attending physician or United States Capitol Police-contracted physicians, ensuring that unscheduled absences are valid and physicians provide adequate documentation to support fitness for duty.

# APPENDICES

## *List of Recommendations*

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**Recommendation 1:** We recommend that the United States Capitol Police complete its review of all guidance related to Leave Restriction Status, make necessary updates, and reissue in the proper format to provide adequate instructions for Leave Restriction Status as it relates to both employees and supervisors.

**Recommendation 2:** We recommend the United States Capitol Police reiterate the current requirement for Leave Restriction Status--six occurrences of unscheduled leave without documentation during a continuous 6-month period, looking at the previous 6-months from the date of the last infraction. In addition, supervisors should conduct regular (semi-annual) reviews of leave records across the Department so supervisors monitor unscheduled leave consistently.

**Recommendation 3:** We recommend the United States Capitol Police include a formal timeline requirement that the Office of Human Resources respond within 10 business days to a request for employee placement into a Leave Restriction Status.

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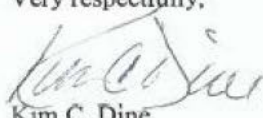
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## DEPARTMENT COMMENTS

	<b>UNITED STATES CAPITOL POLICE</b> OFFICE OF THE CHIEF 119 D STREET, NE WASHINGTON, DC 20510-7218	Phone: 202-224-5555  USCP-OIG SEP 23 2015 12:50
	September 23, 2015	COP 151142
 <b><u>MEMORANDUM</u></b>		
<b>TO:</b>	Ms. Fay F. Ropella, CPA, CFE Inspector General	
<b>FROM:</b>	Kim C. Dine Chief of Police	
<b>SUBJECT:</b>	Response to Office of Inspector General (OIG) draft report <i>Agreed-Upon Procedures of United States Capitol Police Leave Restriction Status</i> (Report No. OIG-2015-09).	
<p>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 <i>Agreed-Upon Procedures of United States Capitol Police Leave Restriction Status</i> (Report No. OIG-2015-09).</p> <p>The Department agrees with all of the recommendations and appreciates the opportunity to work with the OIG to further improve upon policies and procedures. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect to achieve long term resolution of these matters.</p> <p>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.</p>		
	Very respectfully,  Kim C. Dine Chief of Police	
cc:	Matthew R. Verderosa, Assistant Chief of Police Richard L. Braddock, Chief Administrative Officer [REDACTED] USCP Audit Liaison	
Nationally Accredited by the Commission on Accreditation for Law Enforcement Agencies, Inc.		

## **Agreed-Upon Procedures**

### **Identify Current Procedures**

- Obtain and review current [REDACTED] Standard Operating Procedures (SOP).
- Conduct interviews to determine procedures performed regarding restricted leave personnel. Compare procedures identified to SOP's and document any differences.

### **Determine Monitoring Procedures**

- Identify procedures to continue monitoring of Restricted Leave candidates, and previous restricted leave employees.
- Provide recommendations to improve process.

### **Identify Best Practices**

- Obtain GAO reports, as applicable, and information from other similar law enforcement organizations (i.e., US Park Police, DC Metropolitan Police, USMS) to identify and report best practices.
- Compare best practices identified in step 3 to current USCP policies and identify differences.

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