



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Performance Audit of the United States Capitol Police Training Services Bureau

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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.

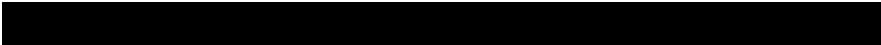

This report is the result of an assessment of the strengths and weaknesses of the office or function under review. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and review of applicable documents.

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.

Fay F. Ropella, CPA, CFE
Inspector General

TABLE OF CONTENTS

	<u>Page</u>
Abbreviations and Acronyms	iii
Executive Summary	1
Background	4
Objectives, Scope, and Methodology	5
Results	8
Inadequate Controls	8
Compliance with Policies and Procedures Needs Improvement	14
Appendices	16
Appendix A – List of Recommendations	17
Appendix B – Department Comments	19
	

Abbreviations and Acronyms

Calendar Year	CY
Chief Administrative Officer	CAO
Fiscal Year	FY
Government Accountability Office	GAO
Office of Financial Management	OFM
Office of Human Resources	OHR
Office of Inspector General	OIG
Personnel Performance Notation	CP-550
Recruit Officer Class	ROC
Standard Operating Procedures	SOP
The Commission on Accreditation for Law Enforcement Agencies	CALEA
Training Management System	TMS
Training Services Bureau	TSB
United States Capitol Police	USCP or the Department

EXECUTIVE SUMMARY

The United States Capitol Police (USCP or the Department) maintains a Training Services Bureau (TSB) in Cheltenham, Maryland—frequently referred to as “the Academy.” TSB supports the USCP mission by training new recruits and providing in-service training to sworn and civilian employees so Department employees are capable of fulfilling the strategic plan, goals, and objectives of the Department.

In accordance with our annual plan, the Office of Inspector General (OIG) conducted a performance audit of TSB. The objectives of the audit were to determine if the Department (1) established adequate internal controls and processes for ensuring that TSB maintained the integrity of its program as well as efficient and effective program operations, and (2) complied with applicable laws, regulations, and guidance pertaining to management and operation of its training responsibilities. The scope of the audit included internal controls, processes, and operations from Fiscal Year (FY) 2011 through FY 2015.

Overall, TSB did not establish adequate internal controls and processes for ensuring efficient and effective administration related to training for new recruit officers. Neither TSB nor the Department had a formal process requiring routine updates and approval of its *Academy Rules and Training Standards*. One TSB official stated that in November 2014 as well as April 2015, TSB “sent” an updated copy of its rules and standards in draft form to the Department for review and approval. As of April 29, 2016, however, the Department had not responded. While the Department agrees that the chain of command should approve *Academy Rules*, it has not traditionally occurred. The lack of oversight provided an environment in which the use of force¹ grading criteria was inadvertently changed. TSB changed the use of force grading criteria—from a previous 100-percent standard to 80 percent [Recruit Officer Class (ROC) 179.] As a result, the *Academy Rules* issued to ROC 179—graduating on March 20, 2015—permitted eight recruits to challenge the test results on the use of force, which required remediation and allowed recruits to graduate with a lower level of proficiency in the use of force than sworn officers who had graduated earlier. Such a disparity in controls resulted in a lack of coordinated implementation of policy and guidance and could lead to sworn officers not adequately completing their duties or inconsistently meeting Department needs.

TSB also reported inaccurate recruit scores to management. Instructor-graded examinations of recruits did not agree with scores transcribed into class ranking spreadsheets, which resulted in TSB reporting scores to management that were not accurate. That condition occurred because TSB recorded preliminary scores rather than final scores. As a result, TSB was at risk of graduating recruit officers who did not meet established and approved *Academy Rules and Training Standards*, dated April 1, 2015, and July 1, 2014, respectively. According to a TSB

¹ Directive [REDACTED], dated July 15, 2015, states, “It is the policy to the Department to allow officers to use only the level of force that appears reasonably necessary to effectively accomplish their lawful objectives (bring a subject under control), while protecting the lives of officers and others.”

official, “staff tracks student progress very closely, especially any failures.” Foremost, TSB did not have documented procedures for maintenance of recruit officer files, which resulted in numerous instances of missing evidence from training files. Of 35 recruit files reviewed, TSB could not find 11 recruit examinations, 17 graduation certificates, and an undetermined number of [REDACTED]. The inability to locate important documents occurred primarily because of a lack of control procedures, resulting in inconsistent organization of training documents. Without supporting evidence, TSB could not validate training scores and ultimately, determine whether recruits met performance requirements for graduation. While the testing did not note that incorrect scores allowed a recruit officer to pass that should not have, the Academy reported inaccurate results.

The Department also did not have adequate controls over its in-service training and development of applicable Standard Operating Procedures (SOPs) primarily because the process throughout the Department was decentralized. For example, some SOPs did not indicate the bureau or division responsible for conducting the training, the frequency of occurrence, or the substance of course material. In addition to a lack of a mechanism for reporting the training to TSB, controls for ensuring the training occurred were not in place. According to Directive [REDACTED] dated October 19, 2012, TSB is responsible for entering training data into its Training Management System (TMS.) Other Department elements that conduct training are responsible for entering completion of training into TMS. Yet, as of May 2016, procedures lack the specific guidance for ensuring other elements record training into TMS or report the training information to TSB. Without such provisions, the Department cannot ensure training occurs as prescribed in the SOPs.

The Department’s method for tracking overtime-training hours was not precise. The Department requested in its budget for several years—and was provided—funding specifically for overtime related to training. The methodology used for tracking overtime hours, however, required use of an indirect relationship between training and overtime. The relationship implies a correlation that officer training requires another officer to backfill for an officer in training.

A disparity existed between how TMS and [REDACTED] function. TMS tracks training hours, and [REDACTED] tracks overtime hours. Neither system, however, could provide a complete list of employees who attended training and charged overtime. In the majority of cases, [REDACTED] recorded backfill hours as overtime and training time as regular hours. Such a methodology did not allow for validation of data. Without a control, the process was vulnerable to inaccurate reporting as well as potential abuse. Upgrades to [REDACTED] taking place now include a “scheduler” module, which should improve the accuracy of the tracking of overtime related to training.

Although it generally complied with guidance pertaining to management and operation of its training responsibilities, the Department could improve in that area. For example, Directive [REDACTED], dated October 19, 2012, was out of date.

[REDACTED] Per the *Academy Rules and Standards*, the [REDACTED] is used to document the counseling of recruit performance, related to misconduct, poor performance, or suggestions for improvement. [REDACTED] is the name of the automated system used at the USCP to collect, process, report, and maintain hourly/daily/weekly time, attendance, and leave data for USCP employees.

[REDACTED] is the directive the Department issued to comply with The Commission of Accreditation for Law Enforcement Agencies⁴ (CALEA) standards. Chapter 33 of the directive, *Training and Career Development Standards* 33.5.1, requires that agencies have written guidance requiring that sworn personnel complete annual training. The Directive, however, did not specify, the training requirements or the frequency with which that training must be accomplished. Without the required training specifics and frequencies, establishing a long-term training plan will most likely remain a challenge. TSB cannot accurately prepare a long term training plan requesting resources commensurate with Department mission requirements without a policy that requires a minimum annual training threshold. An approved long-term training plan would ensure that the Department achieves its strategic goals and performance objectives. Lack of an approved long-term plan could leave the training resources vulnerable to either mismanagement or misapplication—both of which could be deleterious for the Department because it must maintain consistent application of training to guarantee that sworn officers possess the knowledge, skills, and abilities to accomplish its mission.

USCP did not always comply with its policies and procedures for designated mandatory online training such as “use of force.” USCP Bulletins [REDACTED] dated November 25, 2013; [REDACTED] dated April 10, 2014; [REDACTED] dated June 1, 2015; [REDACTED], dated October 30, 2015, each signed by the Chief of Police, require that designated employees complete mandatory online training classes by the end of each calendar year (CY). Completion rates for mandatory training during 2013, 2014, and 2015 were 98.34 percent, 94.75 percent, and 86.64 percent, respectively. As shown by the decline in compliance with the mandatory training requirements, TSB has not been able to implement consistent procedures that identify and follow up with supervisors regarding employees not completing mandatory training. Ultimately, supervisors, employees and the chain of command must respond to TSB follow-ups in order to obtain higher compliance rates. As a result, there was increased risk that employees could continue to lack the required skills for adequately completing their duties and consistently meeting Department needs.

Constrained budgets make it essential that TSB be included in the decision-making process when identifying the appropriate level of investment and establishing priorities for employee training and development. To ensure the integrity of its recruit and in-service training programs, the Department should establish effective controls. The Department should also update and revise training directives to ensure compliance with mandatory training requirements consistent with the Department’s Strategic Plan. Additional improvements such as consistent evaluation of sworn officers would not only help reduce liability exposure but also address critical law enforcement skills and competencies. OIG made six recommendations as shown in Appendix A.

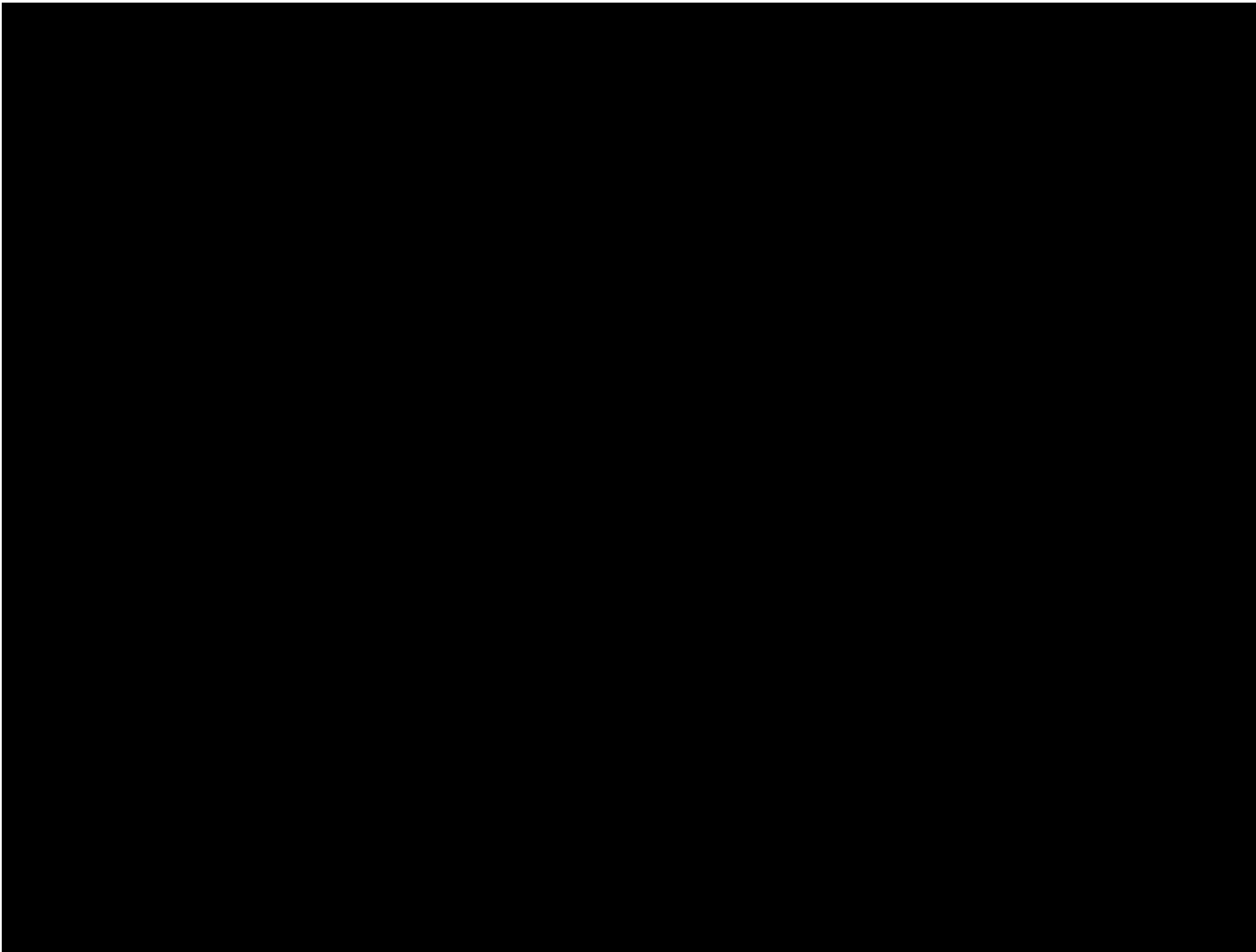
On May 10, 2016, OIG conducted an exit conference and provided a draft report to Department officials. We incorporated the Department’s comments as applicable and attached their response to the report in its entirety in Appendix B.

⁴ The joint efforts of law enforcement’s major executive associations created CALEA in 1979, as a law enforcement credentialing authority.

Background

The Training Services Bureau (TSB) is responsible for preparing Department employees to act decisively and appropriately in a broad spectrum of situations, for improving overall productivity and effectiveness, and for fostering cooperation and unity of purpose. As of December 2015, TSB had 48 full-time equivalents and 13 vacancies, [REDACTED]. Adjunct instructors supplement the TSB staff vacancies. TSB personnel resources fluctuate depending on the training requirements of the Department. According to TSB officials, “new recruit training consumes a significant portion of training resources, which requires TSB to schedule in-service training around recruit training. In-service training can frequently have additional obstacles scheduling classes around peak work times, and other specialized unit training.”

According to the *TSB Office Plan*, for Fiscal Year (FY) 2015 through FY 2016, TSB is a staff function and reports directly to the Chief Administrative Officer (CAO). While TSB organizationally reports to the CAO, many of its functional activities require a direct relationship to the Chief of Operations. TSB is located in Cheltenham, Maryland.



TSB supports the United States Capitol Police (USCP) mission through human capital and development, assisting the Office of Human Resources (OHR) in recruit selection, providing a central repository for all training records, and coordinating the training to create and sustain a vigorous and motivated workforce.

The USCP OHR selects new recruits through an assessment process facilitated by TSB called the Assessment Center. OHR hires the candidates with the best assessment scores. New recruits report for a 1-week briefing at Cheltenham prior to 12 weeks of training at the Federal Law Enforcement Training Center in Glynco, Georgia; and TSB conducts another 12 weeks of USCP-specific training. Once training is complete, the Office of Chief of Operations assigns graduates to specific areas.

TSB adopted the Training Management System (TMS) for training enrollment. According to USCP Bulletin [REDACTED], dated July 11, 2013, TSB transferred training data from the Enterprise Learning Management (ELM) module to TMS.

TSB and other elements provide Officer in-service training, continuing professional education to sworn employees to help those employees maintain the skills necessary to perform assigned duties and comply with certification requirements. USCP follows The Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) standards on training and career development.

The Office of Financial Management (OFM) tracks training overtime hours allocated during the budget request process.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Office of Inspector General (OIG) conducted this performance audit to determine if the Department (1) established adequate internal controls and processes for ensuring efficient and effective training operations, and (2) complied with applicable laws, regulations, and guidance pertaining to management and operation of its training responsibilities. The scope included controls, processes, and operations during FY 2011 through FY 2015, which included 14 recruit officer classes (Recruit Officer Class [ROC]) 167 through ROC 180.⁵

To accomplish our objectives, we interviewed officials from TSB, OHR, and OFM, including sworn and civilian personnel, and reviewed documentation to gain an understanding of the following areas:

- Recruiting and hiring
- New recruit training

⁵ ROC 167 graduated in July 2010, and ROC 180 graduated in November 2015.

- In-service training
- TSB manpower and budgetary resources
- The current procedures and systems used to track and document recruit and in-service training
- TSB and Department Strategic Plans

To determine compliance, we reviewed the following guidance and Standard Operating Procedures (SOP), listed in order of issuance:

- [REDACTED], dated February 18, 2005
- USCP SOP [REDACTED], dated January 30, 2011
- USCP SOP [REDACTED], dated May 28, 2012
- USCP Directive [REDACTED], dated October 19, 2012
- USCP Directive [REDACTED], dated October 19, 2012
- *CALEA Standards for Law Enforcement Agencies*, 5th Edition, revised March 4, 2014
- *USCP Training Standards*, dated July 1, 2014
- Government Accountability Office (GAO), *Standards for Internal Control*, GAO-14-704G, dated September 2014
- *USCP Academy Rules*, dated April 1, 2015
- USCP Directive [REDACTED], dated April 7, 2015
- Training Bulletin [REDACTED], dated May 26, 2015

We also performed testing to determine the adequacy of controls for ensuring the accuracy of recruit grades (for example, record keeping). There were 271 recruits in the 14 classes associated with ROC 167 through ROC 180. We selected a non-statistical sample of 35 recruits to determine if USCP maintained documentation in support of reported graduation grades.

During the scope of the audit, TSB conducted 14 ROCs and graduated 249 recruits as shown in Exhibit 2. Each ROC class from start to completion took about 25 to 26 weeks.

Exhibit 2 – Training Services Bureau Recruit Officer Classes

Recruit Officer Class	OHR New Recruit Hires	OHR Recruit Rehires	Pre-FLETC Attrition	Total FLETC Attrition	Total USCP Attrition	Total Recruits Graduating	Graduation
ROC 167	22	0	0	2	0	20	7/23/2010
ROC 168	14	0	0	1	1	12	6/24/2011
ROC 169	13	0	0	0	1	12	09/16/2011
ROC 170	18	0	0	0	1	17	12/16/2011
ROC 171	7	0	0	0	1	6	01/20/2012
ROC 172	17	0	0	0	0	17	05/18/2012
ROC 173	13	2	1	1	0	13	08/31/2012
ROC 174	23	0	0	0	0	23	12/7/2012
ROC 175	10	0	2	1	0	7	03/01/2013
ROC 176	18	1	0	1	0	18	08/01/2014
ROC 177	24	0	0	1	1	22	11/14/2014
ROC 178	44	0	0	5	4	35	01/23/2015
ROC 179	24	3	1	1	0	25	03/20/2015
ROC 180	24	0	0	0	2	22	11/20/2015
Totals	271	6	4	13	11	249	

Source: OIG generated from TSB provided ROC 167 through 180 Class Reports.

TSB offered in-service classes for FY 2013 through FY 2015, shown in Exhibit 3. Class information for FY 2011 and FY 2012 is not displayed because TSB staff stated that data were not reliable, claiming a segregation of duty issues with the old training system.

Exhibit 3 – Training Services Bureau Classes Offered and Class Registrations

Year	Classes Offered	Class Registrations	Attendance	Canceled	Absent
2013	1,731	17,943	16,789	513	494
2014	1,444	20,228	16,770	1,895	1,076
2015	1,215	24,817	19,874	2,210	1,033

Source: OIG generated from TSB reports for FY 2013 through FY 2015.

OIG conducted this performance audit in Washington, D.C., from November 2015 through May 2016 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 10, 2016, we conducted an exit conference and provided a draft copy of this report to Department officials for comment. We incorporated Department comments as applicable and attached its response to the report in its entirety as Appendix B.

RESULTS

Overall, TSB did not have adequate internal controls and processes for ensuring efficient and effective administration related to training documentation for new recruits. In addition, the Department did not have adequate controls over its in-service training and development and did not comply with applicable Department mandatory training.

Inadequate Controls

The Department did not have adequate controls that would ensure the integrity of its recruit and in-service training programs. *GAO Standards for Internal Control in the Federal Government; Documentation of the Internal Control System*, GAO-14-704G, September 2014, state:

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, as well as a means to communicate that knowledge as needed to external parties, such as external auditors.

Management documents internal control to meet operational needs. 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.

The Department did not review and obtain approval of *Academy Rules and Training Standards* on a periodic basis, ensure the accuracy of recruit grades, maintain detailed guidance on the maintenance of recruit records, document as required the component responsibility for training in its policies, or track training overtime hours in a precise manner. We believe the Department would benefit from improvement of its in-service training SOP requiring an approved annual plan. Because it did not have such a plan, the Department did not maintain consistent application of training for validating that recruits and sworn officers possessed the knowledge, skills, and ability to fulfill the department mission, strategic plan, goals, and objectives.

Inadequate Controls over Recruit Training

Overall, TSB did not establish adequate internal controls and processes for ensuring efficient and effective administration related to training for new recruits. TSB and Department policy did not have a formal, documented process to routinely update and approve academy rules and standards. A TSB official stated that the draft rules and standards document was "sent" to management for review and approval in April 2015 and November 2014, respectively. While the Department agrees the chain of command should approve the *Academy Rules*, it has not traditionally occurred. The lack of oversight provided an environment in which the use of force⁶ grading criteria was

⁶ Directive [REDACTED], effective date July 15, 2015, states "It is the policy to the Department to allow officers to use only the level of force that appears reasonably necessary to effectively accomplish their lawful objectives (bring a subject under control), while protecting the lives of officers and others."

inadvertently changed. The criteria for use of force changed the standard from 100 percent to 80 percent for ROC 179. Therefore, the training standards issued to ROC 179 graduating on March 20, 2015, permitted eight recruits to challenge the test results of the use of force, which required remediation and allowed recruits to graduate with a lower level of proficiency in the use of force than previous graduates. Lack of controls resulted in a disparity in implementation of policy and guidance. Without a coordinated approval process, the Department risks distributing obsolete material to new recruits, with an end result of establishing a lower level of proficiency for sworn officers.

Incorrect Reporting of Recruit Grades

TSB reported to management incorrect recruit scores and grades. ROC 167 through ROC 180 had 271 recruits, for which we selected a sample of 35 recruits to conduct detailed attribute testing. Attribute testing consisted of examining the training files of recruits toward graduation. According to [REDACTED], dated February 18, 2005, and interviews with TSB staff, recruit officer files should contain a variety of documents, including copies of each graded examination, [REDACTED], and graduation certificates. Of the 35 files reviewed, four included examination scores that did not agree with the scores on class ranking spreadsheets. TSB reported the incorrect scores to management. The scores did not match because TSB recorded preliminary scores, but did not update the results when final scores were available. As a result, TSB was at risk of graduating recruit officers that had not met *Academy Rules and Training Standards*. According to a TSB official, “staff tracks the student progress very closely, especially any failures.” While the testing did not note that incorrect scores allowed a recruit officer to pass that should not have, the Academy reported inaccurate results.

Documentation Missing from Recruit Officer Files

TSB did not have established procedures for maintaining files for recruit officers, which resulted in numerous instances of missing documentation. For example, of the 35 files reviewed, TSB could not find 11 examinations or 17 graduation certificates. In addition, an undetermined number of [REDACTED] were missing. That condition existed because the Department did not have proper internal control procedures. Without supporting documents, TSB could not validate training scores and ultimately determine whether recruits met performance requirements for graduation.

Of the 35 files reviewed, 34 files were missing a total of 231 graded examinations from the electronic ROC folder in support of grades reported to management on summary spreadsheets. When we inquired about the missing examinations for the 34 recruit files, the TSB Administrative Officer found 220 examinations related to 23 of the recruits in other locations. TSB explained that the documents were not located because of insufficient guidance that, led to inconsistent filing. However, 11 examinations for 11 recruits remained missing. Almost 100 percent of the tested files were missing at least one document. Of the same 35 recruit files, 17 also were missing graduation certificates from their electronic ROC folder. When asked about missing certificates, the Administrative Officer stated that TSB did not maintain copies of graduation certificates. The

⁷ [REDACTED] per the Academy Rules, the [REDACTED] is used to document the counseling of recruit performance, related to misconduct, poor performance, or suggestions for improvement.

Administrative Officer further stated that recruit unit jackets contain the certificates. Upon the recruit's graduation, TSB forwards the records to the assigned division or unit. Of the files reviewed at the unit level, none contained certificates.

We also reviewed the 35 recruit files for documentation of personnel performance notifications. TSB instructors use a [REDACTED] to document counseling or noteworthy performance. In most cases, [REDACTED] note misconduct or poor performance. Of the 35 recruits files tested, 8 were missing [REDACTED] supporting grades reported. The Administrative Officer stated that in all likelihood, an unknown number of [REDACTED] were missing for recruits and that missing [REDACTED] were not limited to examination failures. The exact number of missing [REDACTED] could not be determined because no central repository exists for [REDACTED].

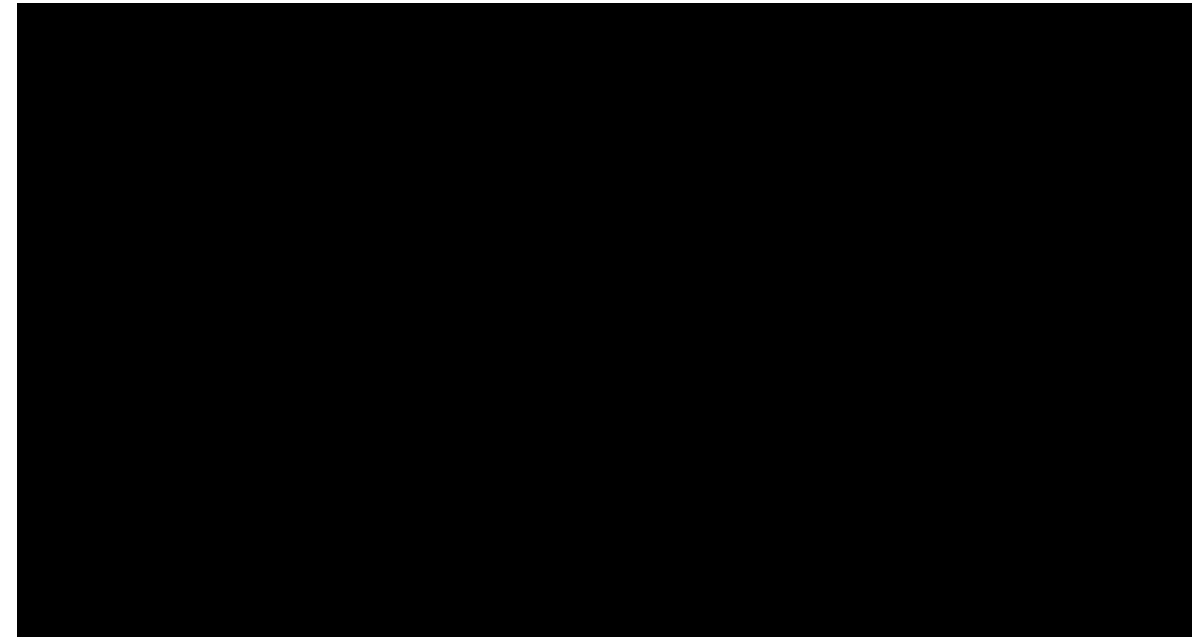
Department policies for retention of [REDACTED] have conflicts. In addition, multiple administrative personnel scan and file the documents. The Department's policy, dated February 2005, for records management requires retention of grades and certificates. Although TSB staff should maintain [REDACTED] as part of the officer academy files, USCP Directive [REDACTED] dated October 19, 2012, states that [REDACTED] must be properly maintained and placed in an employee's Unit Personnel File. However, the Directive requires that the Department purge the [REDACTED]s from the employee's file after 1-year.

TSB would benefit from guidance that provides clear instruction regarding maintenance of performance notes. Guidance could be in the form of a new or revised SOP with specific instructions for TSB recruit files. Inconsistent filing of supporting documents resulted in TSB not being able to validate training scores, and ultimately being unable to determine whether recruits met performance requirements for graduation.

Inadequate Controls over In-Service Training

The Department did not have adequate controls over in-service training. For example, SOPs do not identify the component responsible for training. We reviewed a sample⁸ of 31 SOPs [REDACTED]. Of those 31 SOPs reviewed, OIG noted that 10 SOP's, or 30 percent, identified training as a component of the guidance. The SOPs, however, do not, state the component responsible for conducting the training, the substance of the training, or its frequency. For example, SOP [REDACTED] dated October 29, 2012, identifies the Patrol Mobile Response Division Commander as the process owner to ensure training "is provided for individuals identified as Mass Arrest Operations Supervisors." The SOP, however, does not; provide any specific information on the substance or frequency of the training. Without more specifics on when a training class will be taught, who will teach it, how the material will be delivered, how often the training must occur, and a mechanism to track progress, USCP is at risk of operational inconsistency. Although not responsible for this training, per Directive [REDACTED] dated October 19, 2012. TSB has taken a position that TMS should include all training data. [REDACTED] displays the 10 SOPs, we identified with a training component.

⁸ Sample methodology consisted of scanning PoliceNet link for SOPs. We judgmentally selected SOPs that had the best chance of referring to training based on the SOP title.



Additional inquiry determined that one effect of the lack of information in SOPs containing a training requirement is that the training is unaccounted for in the annual training plan or training overtime provisions. The SOPs in [REDACTED] do not reference the function responsible for providing the training. The SOPs also do not provide authority for managing the training. As of May 2016, the process for approving SOPs with a training aspect drafted by other Bureaus or Offices that conduct their own training do not include TSB.

SOPs that do not formally designate responsibility for training can result in an environment where a lack of accountability exists. An SOP comprises a set of step-by-step instructions for achieving predictable, standardized, and desired results within the context of a longer overall process. The GAO *Standards for Internal Control* state, “management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives.”

Tracking of Training Overtime Hours Needs Improvement

The Department’s method for tracking overtime hours used for training purposes needs improvement. The USCP budgets for FY 2011 through FY 2016 identified 24,000 hours needed to accomplish annual training, and the Department has a separate allocation for those expenses. Based on historical training data, management determined that approximately 24,000 hours would be sufficient. That equates to about 16 overtime hours for each officer, with a department average of 1,500 officers.

Data for actual hours assigned to training overtime are acquired from two sources. The first source is actual overtime from the officer taking training when that officer requires additional time to take a course. The Department refers to the second source as “backfill”⁹ overtime. The operational unit will schedule another officer to backfill for the officer attending training. As shown by

⁹ Backfill – Backfilling is an employment term where an employee assigned to a position is filled by another employee. Backfilling occurs when an employee is moved (such as sent to training) and replaced by another

Exhibit 5, actual training overtime hours has consistently been lower than the actual budgeted hours. According to the Deputy CAO, that occurred because of the Sequestration rules in FY 2013, and in FY 2015 when the Department moved training overtime to higher priorities during high-visibility visits such as the Papal Visit in September 2015. Also noted, that during FY 2011 and FY 2012 unplanned dignitary protection was required.

Exhibit 5 – USCP Tracking and Reporting of Training Overtime

Fiscal Year	2011	2012	2013	2014	2015
Budgeted Hours	24,000	24,000	24,000	24,000	24,000
Actual Hours	8,001*	13,158*	5,007**	22,510	11,717***

Source: OIG generated from data provided by OFM.

* 2011 & 2012 unplanned dignitary protection required.

** Sequestration.

*** Training funds moved to higher priorities such as during the Papal Visit in September 2015.

The Department's methodology for tracking hours used an indirect relationship because officer training required another officer to backfill for the officer in training. In most cases, [REDACTED] records in such a way that backfill hours are designated as overtime and training time as regular hours. The methodology did not allow for validation of data. That method of tracking can produce imprecise results. The actual overtime tracking occurs only if the Department establishes a code in [REDACTED]. Discussion with USCP staff indicates that precision will improve with implementation of the Scheduler module for [REDACTED]. Without a mechanism to double check the data, the process is subject to abuse and over-reporting of training overtime.

Outdated Directive Presents a Challenge to Establishing Training Plan

As long as USCP Directive [REDACTED] is outdated, preparing a consistent and long-term training plan will remain a challenge. The Department established this Directive to comply with CALEA standards. Chapter 33, [REDACTED] relates to training and development of law enforcement personnel and requires that agencies have a written directive requiring sworn personnel to complete annual training. Subchapters discuss organization and administration of the training function; training academy administration; training instructors; recruit training; in-service, shift briefing, and advanced training; specialized training; civilian personnel training; and career development.

The Directive does not require the Chief to approve an annual training plan, which would, specify training requirements and the frequency of the required training. Without training specifics and frequency requirements, establishing consistent long-term training plans will remain a challenge for the Department. TSB cannot accurately request resources commensurate with Department mission requirements without a policy that requires an annual plan with a long-term outlook. An approved long-term training plan will ensure that the Department can achieve its strategic goals and performance objectives. The lack of a long-term approved plan can leave the training budget susceptible to cannibalization. The Department must maintain consistent application of training to guarantee that sworn officers possess the knowledge, skills, and ability to carry out the Department mission. Although TSB submitted an annual training plan after the training year began for 2015, no

employee.

evidence exists that management reviewed or approved the plan. As the ranks of the sworn grow toward approximately 2,000 officers, any required training will take multiple years to complete and should be included in the strategic plans for the Department and TSB as well as the Department's performance measures.

There were variations noted in the amounts of the TSB allotment each year. Explanations that TSB provided indicate the training budget often becomes the source for re-prioritization of funding during 4th quarter budget execution reviews. TSB officials stated that such re-prioritizations could significantly influence training efforts going forward, which requires that the Department catch up with delayed training the following year.

Conclusions

The Department did not require review and approval of *Academy Rules* and *Training Standards* on a periodic basis and lacked procedures that would ensure the accuracy of recruit grades. TSB could use detailed guidance on the maintenance of recruit records. SOPs do not identify the component responsible for in-service training on all SOPs that describe training. The Department tracking of overtime related to training needs improvement. The In-Service Training Directive does not list specific training and the frequency in which it should occur. The lack of a periodic review and approval of *Academy Rules* and *Training Standards* could dilute the integrity of the training academy. TSB records management allows inconsistent filing of training documents. Without supporting evidence, TSB was not able to validate training scores or support disciplinary actions, and ultimately determine whether recruits met performance requirements for graduation. The lack of internal control procedures related to Department SOPs creates an environment for inconsistency. In addition, as long as the USCP Directive [REDACTED] is outdated, preparing a long-term training plan will remain a challenge for TSB as well as the Department.

Recommendation 1: We recommend that the United States Capitol Police establish a policy directed toward operation of the Department and the Training Services Bureau, which includes reviewing, updating and approving all training documents, including the *Academy Rules and Training Standards* on a periodic basis, or more frequently, as needed.

Recommendation 2: We recommend that the United States Capitol Police Training Services Bureau document policies and procedures for retention of pertinent recruit performance records. The policy should include a listing of required documents. The Training Services Bureau should clearly communicate policies and procedures to all future record filers to help ensure proper record retention. The Training Services Bureau also should conduct periodic inspections of records to ensure that maintenance of training documents are according to policy.

Recommendation 3: We recommend that the United States Capitol Police update or establish the review and approval process for in-service training in its Standard Operating Procedures by clearly identifying training components and clarifying the responsible component for conducting training, and the frequency of training. If the

Training Services Bureau is determined to be the provider of the training, the Standard Operating Procedures should include the Training Services Bureau in the review and approval process.

Recommendation 4: We recommend that the United States Capitol Police immediately establish a code in [REDACTED] for “Regular Time” training, and perform periodic analysis of the overtime-training hours that will allow the Department to improve timekeeping coding for all training hours.

Recommendation 5: We recommend that the United States Capitol Police immediately update Directive [REDACTED], dated October 19, 2012, or establish a new directive, which provides a listing of in-service training requirements and the frequency with which such training should occur. Guidance would provide for review and approval by the Chief of Police of an annual training plan with a long-term outlook that could assist in achieving a vigorous and motivated workforce that is highly trained and armed with the necessary knowledge, skills, and abilities to achieve the Department mission.

Compliance with Policies and Procedures Needs Improvement

The Department needs to improve compliance related to training. For example, the Department did not have a process for ensuring compliance with mandatory training requirements.

No Process for Ensuring Compliance with Mandatory Training

USCP did not always comply with its policies and procedures for designated mandatory training because it lacked a process for ensuring that personnel comply. Mandated online training compliance rates were less than 100 percent as shown in Exhibit 6. Overall completion rates for Calendar Year (CY) 2013 through CY 2015 were 98.34 percent, 94.75 percent, and 86.64 percent, respectively. Most importantly, completion of the *Use of Force Training Course* showed a significant decline in compliance from about 99 percent in 2013 to about 88 percent in 2015.

Nevertheless, USCP Bulletins [REDACTED], each signed by the Chief of Police, require that designated employees take mandatory online training classes by the end of the calendar year. That occurred primarily because the bulletins did not specify any follow-up procedures, no tracking process for compliance was included, and TSB did not implement procedures for identifying and following up with employees who had not completed the required training. Accordingly, USCP did not comply with its internal training requirements. As a result, an increased risk exists that employees lacked the required skills and knowledge to adequately complete their duties and consistently meet Department needs.

Exhibit 6 – Compliance Rate for On-line Mandatory Training

Classes	Compliance Rate 2013	Compliance Rate 2014	Compliance Rate 2015
Use of Force	98.79%	94.73%	87.66%
Fire Extinguisher	98.73%	94.99%	88.17%
Bloodborne Pathogens	98.86%	94.52%	88.23%
Bias-Based Profiling	98.15%	94.74%	87.76%
Emergency Hospitalization of Mentally Ill	97.17%	N/A	N/A
Interacting with the Media	N/A	N/A	82.61%
Ethics	N/A	N/A	85.38%
Overall Compliance Rate	<u>98.34%</u>	<u>94.75%</u>	<u>86.64%</u>

Source: OIG Generated from TSB data.

Conclusions

USCP did not comply with Department guidance mandating on-line training. The mandated training bulletins do not specify follow-up procedures that could improve compliance rates. Thus, OIG makes the following recommendation.

Recommendation 6: We recommend that the United States Capitol Police document and implement follow-up procedures requiring notification of supervisors when employees do not complete mandatory training. Supervisors should note in performance evaluations when an employee does not satisfy the mandatory training requirement.

APPENDICES

List of Recommendations

Recommendation 1: We recommend that the United States Capitol Police establish a policy directed toward operation of the Department and the Training Services Bureau, which includes reviewing, updating and approving all training documents, including the *Academy Rules and Training Standards* on a periodic basis, or more frequently, as needed.

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Recommendation 6: We recommend that the United States Capitol Police document and implement follow-up procedures requiring notification of supervisors when employees do not complete mandatory training. Supervisors should note in performance evaluations when an employee does not satisfy the mandatory training requirement.

DEPARTMENT COMMENTS



PHONE 202-224-3805

UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF
119 D STREET, NE
WASHINGTON, DC 20546-7218
May 20, 2016

Received 5/25/16

COP160598

MEMORANDUM

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

FROM: Matthew R. Verderosa
Chief of Police

SUBJECT: Response to Office of Inspector General (OIG) draft report *Performance Audit of the United States Capitol Police Training Services Bureau* (Report No. OIG-2016-07).

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendations contained within the Office of the Inspector General's (OIG's) draft report *Performance Audit of the United States Capitol Police Training Services Bureau* (Report No. OIG-2016-07).

The Department generally agrees with all of the recommendations and appreciates the opportunity to further improve upon the policies and procedures within the Training Services Bureau. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect to achieve long term resolution of these matters.

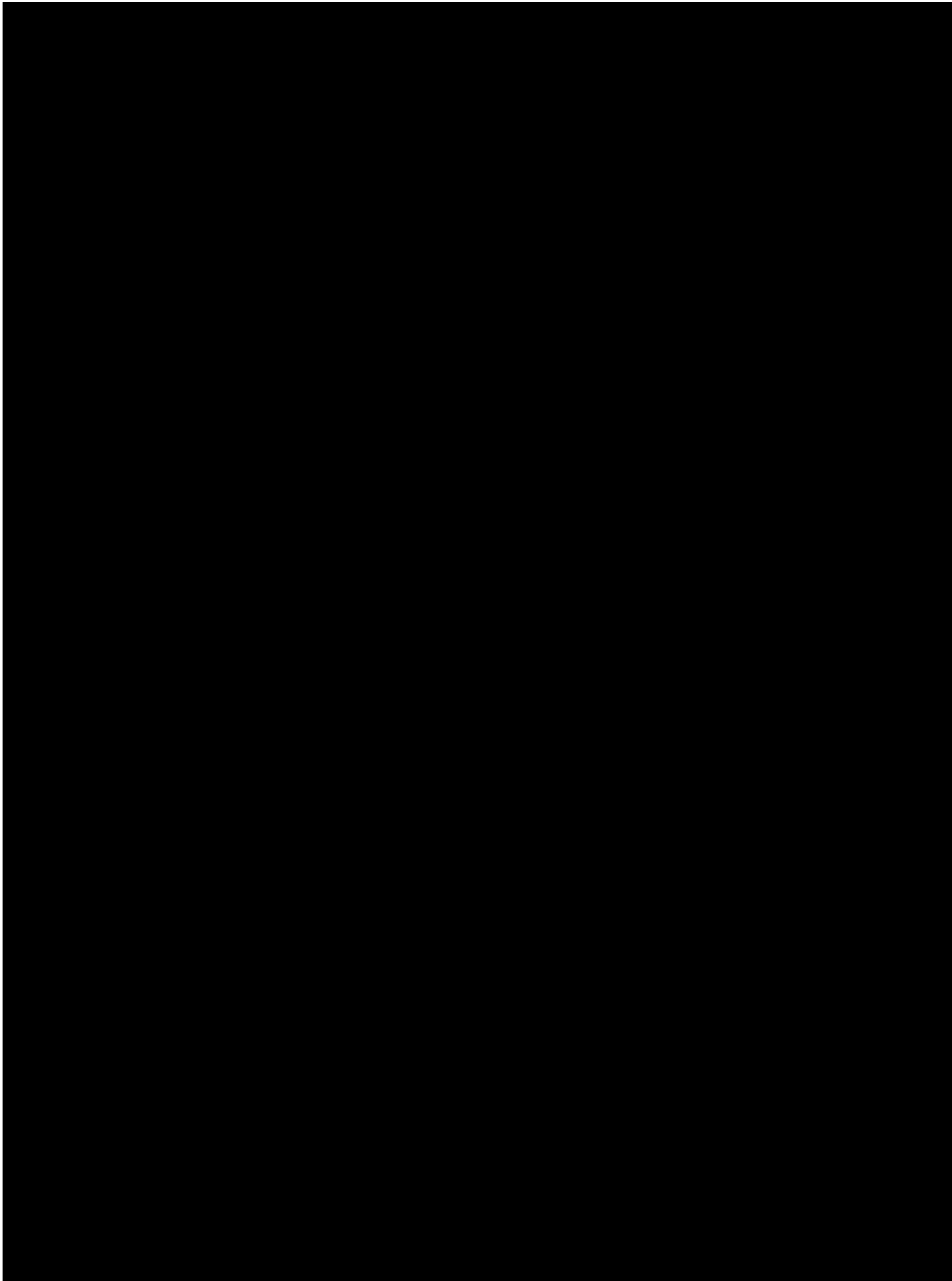
Thank you for the opportunity to respond to the OIG's draft report. Your continued support of the men and women of the United States Capitol Police is appreciated.

Very respectfully,

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

Matthew R. Verderosa
Chief of Police

cc: Richard Braddock, Chief Administrative Officer
[REDACTED] USCP Audit Liaison



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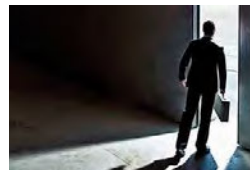
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499 South Capitol St. SW, Suite 345
Washington, DC 20510*



Or visit us:

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Washington, DC 20003*



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