DEPARTMENT OF THE INTERIOR

OFFICE OF INSPECTOR GENERAL

ASSESSMENT OF THE UNITED STATES PARK POLICE

FEBRUARY 2008

PI-EV-NPS-0001-2007

United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, DC 20240

JAN 23 2008

Memorandum

To: Dirk Kempthorne
Secretary

From: Earl E. Devaney
Inspector General

Subject: Assessment of the United States Park Police (No. PI-EV-NPS-0001-2007)

This memorandum transmits our report detailing the results of our assessment of the United States Park Police (USPP). This assessment is part of our continuing efforts to evaluate the management of Department of the Interior law enforcement programs following the Department's 2002 initiative to reform law enforcement.

We found a number of weaknesses in USPP's management and operations that adversely affect the level of security at national icons and present officer safety concerns. We also found that USPP has failed to adequately manage its financial affairs. Finally, we found USPP to be an agency suffering from low morale and lacking confidence in its command staff.

This report contains 20 recommendations which, if implemented, should improve USPP operations and serve as a springboard for additional actions that will correct significant deficiencies that impact the effectiveness of USPP. We would appreciate being kept appraised of the actions the Department takes on our recommendations as we will track the status of their implementation. Please have a written response forwarded to this office within 90 days, identifying plans to address the findings and recommendations cited in this report.

Should you have any questions about this report, please do not hesitate to contact me.

Attachment

TABLE OF CONTENTS

Introduction 1
Background 1
Prior Reviews of USPP 2

Results in Brief 4

Icon Security 6
Icon Coverage 7
Security Plans 16
Training & Qualifications 17

Officer Safety 20
Staffing 20
Firearms 21
Ballistic Vests 23
Vehicles 25

Financial Management 29
Budget Formulation & Execution 29
Accountability 32

Management 34
Agency Morale & Confidence in Command Staff 34
Communication 35
Quality Control 36

Recommendations 37

Appendix 1 40

INTRODUCTION

The United States Park Police (USPP) Fraternal Order of Police, Labor Committee, conducted a survey asking members 12 questions regarding various subjects including icon security, officer safety, training, and confidence in the command staff. The results of the survey, published in January 2007, were alarmingly negative in all areas. Approximately, eighty-six percent of the survey respondents said that they do not think the icons are as safe as they could be, and a large majority believes that they do not have the necessary equipment and training to perform their duties. As a result of the Fraternal Order of Police survey and as part of a continuing commitment by the Office of Inspector General (OIG) to examine U.S. Department of the Interior (DOI or Department) law enforcement programs and homeland security efforts, we initiated an assessment of USPP in April 2007.

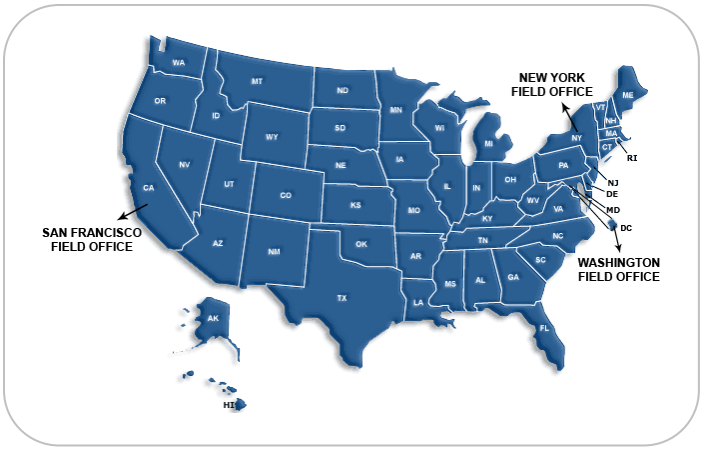
We chose to focus our assessment principally on determining whether USPP has been taking appropriate measures to protect national icons and ensuring officer safety. In addition, we evaluated the formulation and execution of the USPP budget, and USPP management practices.

To accomplish our objective, we conducted over 100 interviews of both USPP law enforcement personnel and support staff. In addition to USPP, we interviewed Department and National Park Service (NPS) officials concerning USPP operations. We observed security measures at the Washington Monument, the Lincoln Memorial, the Jefferson Memorial, and the Statue of Liberty, and we reviewed numerous documents relating to USPP operations. Additionally, we afforded USPP personnel the opportunity to provide their comments, concerns, and suggestions through e-mail.

Because the subject of this report involves matters that are security sensitive, the exact numbers of staff required or positioned at fixed posts will not be presented in this report.

BACKGROUND

USPP was founded in 1791 and is one of the nation's oldest uniformed federal law enforcement agencies. USPP provides law enforcement services to designated areas within NPS, primarily the metropolitan areas of Washington, D.C.; New York City, NY; and San Francisco, CA. The agency is composed of approximately 592 sworn officers, 97 civilian personnel, and 30 security



guards. USPP has three major divisions - the Services Division, the Field Offices Division, and the Operations Division, each commanded by a deputy chief. Additionally, the Planning and Development Unit, the Office of Professional Responsibility, and the Special Protection Unit provide direct support to the chief of police (See Appendix 1 for an organization chart).

On its Web site, USPP states that its mission is the following:

> We, the United States Park Police, support and further the mission and goals of the Department of the Interior and the National Park Service by providing quality law enforcement to safeguard lives, protect our national treasures and symbols of democracy, and preserve the natural and cultural resources entrusted to us.

USPP contributes to this mission through crime prevention, drug enforcement, investigative work, crowd control at public events, and presidential and dignitary protection. USPP also provides security services at the Washington Monument, the Jefferson Memorial, the Lincoln Memorial, and the Statue of Liberty and supplements security services provided at the Golden Gate Bridge. USPP's involvement in icon security is limited to these icons. Other national icons, such as the St. Louis Arch, Mt. Rushmore and Independence Hall, while also managed by NPS, are secured by NPS rangers and contract security guards.

PRIOR REVIEWS OF USPP

Over the past 6 years, several entities have published reports regarding USPP operations, including the National Academy of Public Administration, the OIG, and the Government Accountability Office (GAO). The reports issued by these entities exposed weaknesses within USPP and offered recommendations for improvement.

In 2001, the National Academy of Public Administration issued a report addressing deficiencies within USPP and provided 20 recommendations to improve USPP "through clarifying its mission, strengthening its leadership and accountability, and improving its financial and workforce management." In 2004, the National Academy of Public Administration reported on the status of the implementation of its 2001 recommendations and found that only 4 of the 20 recommendations had been fully implemented and 2 had been rejected. The Academy further evaluated USPP's mission, priorities, spending, and staffing trends and provided additional recommendations for consideration.

In 2003, the OIG conducted a review of security at national icon parks and found that NPS, including USPP, had "failed to successfully adapt its mission and priorities to

reflect its new security responsibilities." The report noted that some of the deficiencies could be attributed to the program's infancy, but others arose from a lack of management support of the security mission. The report provided 10 recommendations to improve the continuity and efficiency of icon security throughout NPS.

Finally, in 2005, GAO conducted a review to identify challenges facing DOI in protecting national icons and to identify related actions taken to address those challenges. Overall, GAO found that DOI had improved security at national icons. GAO recommended that DOI take further steps to link results of risk rankings to security funding priorities and establish guiding principles for balancing security responsibilities while achieving the Department's core mission.

RESULTS IN BRIEF

USPP continues to struggle with the competing missions of protecting national icons and monuments and functioning as an urban police department at the same time and with the same resources. Consequently, USPP has failed to adequately perform either mission, which has resulted in deficient security at national icons and monuments and an inability to effectively conduct police operations. USPP operations have been scrutinized in a number of reports over the past 6 years, yet USPP managers have only been minimally successful in implementing recommendations for improvements made in these reports.

Despite national and departmental mandates that require the development and coordination of comprehensive policies, practices, and protective measures, USPP has failed to establish a comprehensive security program for the protection of national icons and monuments. Although USPP officials have stated that the protection of national icons and monuments is a top priority, USPP does not have centralized command level oversight of icon protection. Decisions affecting icon protection are primarily made at the local level.

USPP has not developed comprehensive asset security plans or provided formal training for those responsible for protecting the icons. Additionally, USPP has been unable to properly staff security posts; instead, USPP relies on the use of closed circuit television camera systems to augment security coverage even though these systems are not continuously monitored and are not fully functional. Although USPP and contract security personnel share security duties at the national icons and monuments, we found there is little, if any, cooperation and communication between the two groups. This was particularly evident in Washington, D.C., where officers told us that many of the security guards spoke little English and had little, if any, contact with USPP officers.

Many of the officers assigned to icon and monument protection had not received specialized security training for the protection of national icons and monuments. Similarly, USPP officers have not received minimum annual training, as required by USPP General Orders. USPP recently offered its annual in-service training for the first time in almost 5 years.

Despite increased responsibilities involving the protection of national icons and monuments, USPP staffing levels are lower now than they were 6 years ago. Consequently, USPP has been unable to balance staffing requirements between icon protection and its law enforcement obligations. The lack of a sufficient number of officers has also resulted in concerns with officer safety.

Many USPP officers have not met minimum firearm qualification standards with their duty weapons because of a reported lack of ammunition. Officers at the San Francisco Field Office had not qualified with their weapons in over 1 year.

While we were told that many of the ballistic vests issued to USPP officers were in disrepair, we found these instances to be isolated and not systemic. Yet, we did find that USPP had not taken immediate action to replace ballistic vests containing Zylon, a material determined to be noncompliant with federal standards. We also discovered that USPP did not regularly inspect or maintain a reliable inventory of ballistic vests.

USPP officers in Washington, D.C., do not have enough vehicles for them to properly patrol and respond to calls for service. Many of the available vehicles are ill equipped to respond to emergencies. In fact, we witnessed officers patrolling in a van that had no emergency lights, sirens, or other necessary emergency equipment.

The majority of officers assigned to the Washington metropolitan area acknowledged driving a personally owned vehicle to their beat or post and when traveling from one beat or post to another. While we were told that officers assigned to icon security posts had responded to calls for service using their personally owned vehicles, none of the officers we interviewed admitted to personally responding to a call using their personal vehicles.

USPP has failed to put the proper infrastructure in place to successfully manage its financial affairs, including hiring a qualified individual who can properly oversee and manage USPP appropriations and expenditures. During an NPS review of USPP procurement operations, auditors found that these operations were significantly deficient and inconsistent with Federal Acquisition Regulations and USPP policy.

Although we did not conduct an in-depth review of USPP management practices, our assessment indicated a systemic lack of management and oversight by senior agency officials that has impacted the ability of the agency to function as its mission statement intended. Many of the issues we discovered have contributed to low morale, a lack of confidence in command staff, and poor communication between USPP command staff and officers in the field.

ICON SECURITY

USPP continues to struggle with fulfilling its responsibility to protect the Statue of Liberty, the Washington Monument, the Lincoln Memorial, and the Jefferson Memorial to the degree necessary given the associated national significance of the icons. Several reports over the years have provided USPP with numerous recommendations to improve the management and operations of national icon security. USPP officials continue to state that icon security is a top priority; however, their actions indicate otherwise. According to the Fraternal Order of Police's survey, nearly eighty-six percent of the respondents do not feel that the icons are as safe as they could be.

USPP's failure to dedicate the appropriate level of attention to icon security is evidenced by the lack of a well established comprehensive security program. The responsibility for managing the agency's icon security program is decentralized and has been delegated to mid-level managers from command staff. Two lieutenants, one at the Statue of Liberty, and another in Washington, D.C., are designated as the agency's security managers for icon protection. These lieutenants are responsible for coordinating all icon security efforts, ensuring equipment is maintained, and overseeing security guard contracts. The lieutenants report to their respective district commanders with no centralized command-level oversight of icon protection. Decisions affecting icon protection, including staffing, physical security measures, and training, are primarily made at the local level.

In January 2002, the OIG recommended that each bureau establish a senior-level (GS-14/15), full-time, credentialed security manager to oversee Service-wide security issues.[1] This recommendation was later accepted by the Secretary of the Interior in July 2002 for implementation.[2] This position was envisioned as being responsible for creating policy, establishing procedures, setting priorities, and managing funding. In two follow-up assessments we found that NPS had failed to fully implement the directive.[3] We found that NPS was slow to establish a security manager position and when eventually filled, the manager did not possess the requisite security management experience, training and grade level. In addition, this bureau level security manager is not responsible for security at icons that have a USPP presence, thus failing to provide NPS a dedicated credentialed security manager as called for in the Secretary's Directives.

The lack of a comprehensive program with centralized senior-level oversight of icon security within NPS, coupled with a similar shortcoming within USPP, has contributed to weaknesses in USPP's security program. USPP has been unable to achieve and maintain adequate security coverage at the icons. Additionally, USPP has failed to

---

[1] "Disquieting State of Disorder: An Assessment of Department of the Interior Law Enforcement," p.25

[2] "Law Enforcement at the Department of the Interior, Recommendations to the Secretary for Implementing Law Enforcement Reforms," directive #16

[3] "Homeland Security: Protection of Critical Infrastructure Facilities and National Icons," and "Progress Report: Secretary's Directives for Implementing Law Enforcement Reform."

develop formal asset security plans or provide a formal training program for those responsible for protecting the icons.

ICON COVERAGE

The Department Manual (444 DM 2) outlines security requirements "necessary to minimally safeguard Departmental National Critical Infrastructure/Key Resource assets." As part of these requirements, the manual sets forth minimum provisions for security personnel. To comply with these provisions, USPP officials have established minimum staffing requirements for each of the national icons in Washington, D.C., and for the Statue of Liberty. We found that USPP continues to struggle to meet minimum staffing requirements at these icons on an almost daily basis, often reassigning officers from other units to fill icon security posts.

New York

Current staffing requirements call for a number of fixed posts at the Statue of Liberty and the off-site screening areas at Battery Park and Liberty State Park. These posts assist in providing 360-degree security coverage and are staffed with USPP officers while the Statue is open to the public. In addition to these fixed posts, requirements mandate coverage by Special Weapons and Tactics (SWAT), marine patrol, and canine units. Contract security guards are used exclusively for providing screening services for visitors and authorized vendors.

Ninety-five percent of the officers interviewed at the New York Field Office said that staffing requirements are not being met at the Statue of Liberty. USPP management at the New York Field Office admitted that on an ideal day, even when no one is on leave, USPP is still unable to meet minimum staffing requirements. USPP managers and officers acknowledged that as a result of the lack of staffing, they do not fill all post assignments and often require officers from specialized units such as SWAT, marine patrol, and canine to fill empty security posts. These specialized units have separate and specific duties and responsibilities in relation to security operations, and their duties are mitigated when these personnel are filling fixed posts.

One mid-level manager at the Statue of Liberty told us, "The truth is that we are not covering the posts…it's all smoke and mirrors." Other officers said that while posts are not staffed, on paper they are "covering the Ps," a phrase used by the Liberty District personnel indicating that daily staffing rosters often show that all posts are being covered, even when in some cases the officer listed is on leave. We confirmed the veracity of these statements during observations made on two separate visits to the Statue of Liberty between April and June 2007. On one site visit to Liberty Island on a rainy day, we were unable to find any uniformed USPP personnel outside of the

screening area for several hours. Just before leaving Liberty Island, we did see one USPP officer walking the perimeter of the island with an NPS ranger. During another visit, USPP coverage was conspicuously absent at certain times at the north end of Liberty Island, inside the Statue's base, at the Statue's exit gate, and at the island's arrival pier. We also reviewed daily staffing rosters and found officers assigned to posts who were also listed as being on leave.

No USPP Officer Presence Observed at Statue of Liberty Exit

The Department's Office of Law Enforcement, Security, and Emergency Management (OLESEM) noted similar findings in its April 2007 compliance evaluation of USPP's Liberty District in New York. OLESEM reviewed staffing procedures and noted "some minor staffing and coverage irregularities," also stating that "on paper, all Liberty District assignments are covered." OLESEM noted that to maintain staffing levels, USPP frequently resorted to using officers from specialty units, reducing the effectiveness and availability of those units in the event of an emergency.

A mid-level manager at the Statue of Liberty told us, "Some of the problems [with staffing the Statue of Liberty] have nothing to do with money or people; it's a leadership problem … the urgency is not there." Another mid-level manager told us that the New York Field Office has explored alternative staffing plans that would reduce the need for personnel while still providing adequate coverage. The plan was reportedly presented to the Chief of Police on June 20, 2007; however, no decision has been made regarding implementation of the proposed plan.

While we did not fully evaluate physical security measures surrounding the Statue of Liberty, USPP officials routinely offer the closed circuit television (CCTV) surveillance camera system as a catch-all response to questions concerning 360-degree security coverage. CCTV has proven to be a positive asset for incident management and can later provide video evidence in investigations. CCTV is less effective, however, for real-time surveillance information. At the Statue of Liberty, 110 CCTV surveillance cameras cover Liberty Island, Ellis Island, and the screening facilities at Battery Park and Liberty State Park. All of these cameras are monitored at one central Command and Control Center located on Liberty Island. Generally, one or two people monitor the CCTV system in addition to answering telephones and providing dispatch services. OLESEM also noted this weakness during its policy compliance review and recommended that USPP assign two personnel to these duties at all times and three during peak visitation periods.

Surveillance Camera Room at Statue of Liberty

While CCTV aids in providing 360-degree coverage, it in no way replaces the need for USPP personnel staffing. During one of our site visits at Liberty Island, we were provided with documentation indicating that of the 110 CCTV cameras, 27 were inoperable while others had limited low light and recording capabilities.
Despite the New York Field Office's struggle with providing adequate security coverage through staffing, we found the security manager at the Statue of Liberty has

implemented security measures. The manager collaborated with private industry representatives to incorporate state-of-the-art security equipment at the Statue of Liberty for little or no cost to USPP. Liberty Island has become a test site for security technology. For example, radar technology is used to identify watercraft that ventures into the restricted area around Liberty Island. While we recognize USPP for this effort, we note that this equipment is on loan to USPP, without a contract or agreement, and could be removed at the discretion of the manufacturer. If the manufacturer removed this equipment, USPP would not have the resources to replace it.

Washington, D.C.

USPP's icon staffing requirements for Washington, D.C., stipulate that there will be a certain number of uniformed USPP officers located at the Washington Monument, Lincoln Memorial, and Jefferson Memorial, providing 24-hour coverage. In addition to the USPP officers, each icon is to be staffed with additional contract security guards. A contract security supervisor is located at the Lincoln Memorial, and additional security guards are located at the screening area for the Washington Monument. USPP officers and contract guards are responsible for providing 360-degree coverage at each of the icons. In addition, USPP officers provide patrol services throughout the National Mall on motorcycle, horseback, and by vehicle.

Officers assigned to USPP's Central District are primarily responsible for providing icon protection in Washington, D.C. Officers performing icon security duties work 12-hour shifts at an assigned icon with little or no rotation to other posts and are relieved only for meal breaks. When short on staffing, the division is supplemented with officers reassigned from neighboring districts and specialized units that do not fall directly under the Central Division's chain of command.

Officers see USPP's mission at the icons as important, but they question how it is managed. While discussing the manner in which icon security is managed, one officer stated that icon security in Washington "is just a show put on for people in the Department of the Interior headquarters building." Some officers complained about the lack of mobility they have when filling icon security posts. Another officer e-mailed us, stating, "First, limiting officers to such a narrow field of operations, precludes the possibility of encountering and investigating suspicious activity outside of those boundaries ... Second, limiting officer mobility makes officer movements and positioning predictable, giving a significant advantage to any group planning actions against an Icon."

We found that while USPP and contract security personnel share security duties at the icons, there is little, if any, cooperation and communication between the two groups. Many of the USPP officers we interviewed said they would rather be providing traditional police services instead of securing the icons, yet they resented the security

guard presence. They also resented the idea of replacing USPP personnel at the icons with armed contract security guards, believing that these guards would not have the same level of training or provide the same quality of services as a USPP officer.

Many of the officers we interviewed were critical of the individual security guards employed by the USPP security contractor at the icons. Officers described these guards as under trained and ill equipped to handle their duties. They told us that many of the security guards spoke little English and had little, if any, contact with USPP officers. While we did not review the overall effectiveness of services provided by the contractor, during our site visits in Washington, D.C., we found that the security guards appeared disinterested in their duties, reading the newspaper, talking on cell phones, or congregating in groups. At times, we also found that guards were conspicuously absent from their posts. As a result, they provided little visible deterrence.

Contract Security Guards at the Washington Monument

USPP renewed the security guard company's contract at least once since 2004, despite the contractor's poor service. USPP is solely responsible for the private company chosen and the performance of the guards. A mid-level manager told us that the current company lost its contract with USPP and would be replaced by another contractor in January 2008.

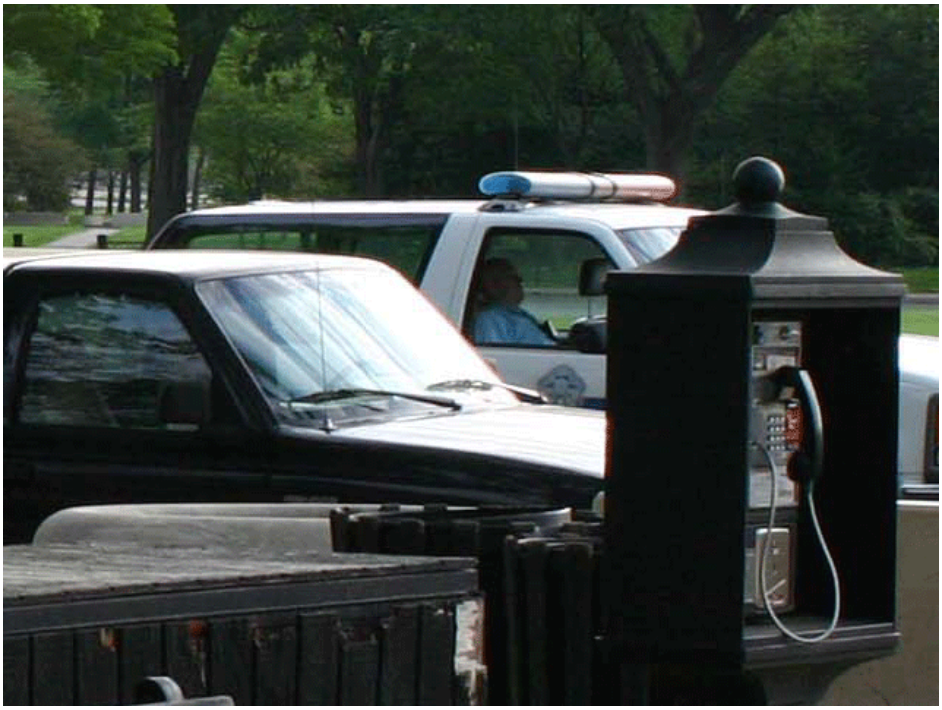
Unlike in New York, a majority of the officers we interviewed in Washington, D.C., believe that staffing requirements are being met at the three icons on the National Mall.

Seventy-five percent of the officers and most of the managers we interviewed stated that staffing requirements are being fulfilled. However, many officers also said these staffing requirements are often fulfilled by reassigning officers from other districts or from specialized units.

In March 2007, OLESEM conducted a 2-day policy compliance evaluation at the national icons in Washington, D.C. OLESEM concluded that "staffing levels at all three Icons were appropriate, with some minor staffing and coverage irregularities noted." However, this statement was based primarily on reviewing staffing rosters covering a 7-day period and one unannounced site visit lasting 14 to 27 minutes at each of the monuments. During the unannounced site visits, OLESEM found only one officer present at the Jefferson Memorial but noted that it observed a person sitting in a parked car near the parking lot entrance that might have been a USPP officer. At the Washington Monument, no USPP officers were present during OLESEM's visit, but upon leaving the area, OLESEM noted that a USPP officer was parked in a marked police vehicle near an NPS building southwest of the monument grounds. At the Lincoln Memorial, OLESEM observed two USPP officers on foot together at the east side of the circle surrounding the Memorial.

Similar to OLESEM's single site visit to each of the icons, our observations revealed that staffing requirements are not being met. We conducted a total of 40 site visits at the Washington, D.C., icons over a 3-month period, at various times of day, and throughout the week. The site visits ranged from 20 minutes to over 2 ½ hours. On 3 of the 40 site visits, or 7 percent of the time, we were unable to locate any officers at the designated icons. On 27 of the 40 visits, or 68 percent of the time, minimum staffing levels were not met.

When we presented these findings to the Assistant Chief, he stated that he would not expect us to see officers. The Assistant Chief explained that the officers should have been roaming and should not have been standing idle in one place for long periods of time. When asked about how having officers conspicuously positioned affects visual deterrence, the Assistant Chief stated that other actions could be taken, such as placing a patrol car near the monument. He stated that USPP is trying to be as unobtrusive as possible because being more visible is a sign of defeat. The Assistant Chief also justified USPP's security position by stating that terrorists are not incredibly sophisticated people.

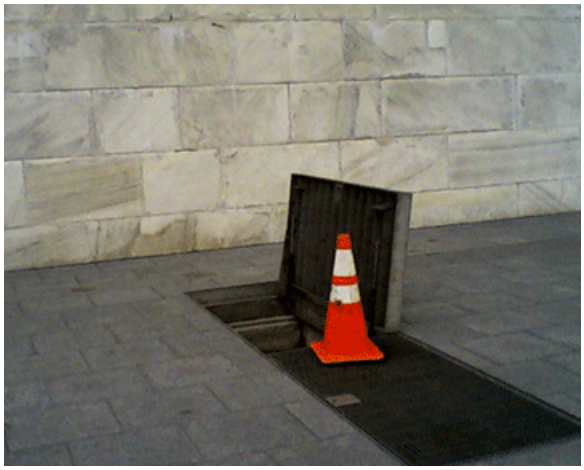


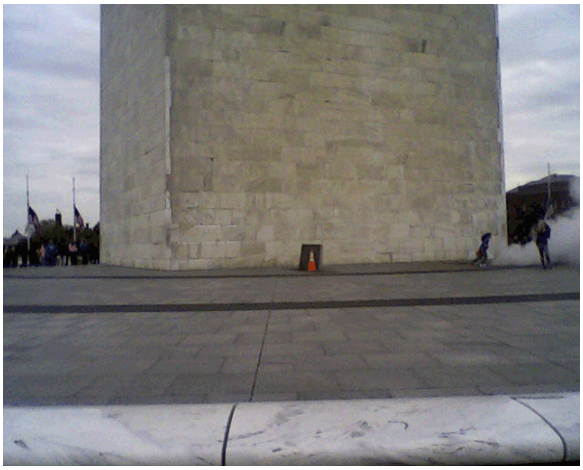
Officer Who Appeared to be Sleeping at the Jefferson Memorial

During the OLESEM compliance evaluation at the icons in Washington, D.C., the Deputy Chief of Operations told OLESEM officials that USPP had developed a proposal to change the levels of staffing at the three icons and reallocate resources to patrolling the areas around the National Mall. OLESEM recommended that the proposal be presented to NPS and OLESEM's Deputy Assistant Secretary prior to arbitrarily implementing changes to an approved staffing plan.

USPP officers and managers also told us that post requirements had been relaxed to allow officers assigned to each icon to patrol the area surrounding the icon itself, including parts of the National Mall. We believe this practice has reduced the visibility of officers, thus not providing an adequate level of visual deterrence at the icons.

We witnessed disturbing incidents and oversights highlighting the lack of security coverage during the extended random surveillance of the icons. On one occasion, we found that a grate securing the stairs leading to the area below the Washington Monument had been left open and unattended for approximately 20 minutes. On another occasion, an unidentified visitor placed a large suitcase against the Washington Monument's south wall. The suitcase was left unattended and unchecked for over 5 minutes before being reclaimed by the visitor. We also found that the visitor centers located in both the Lincoln and Jefferson Memorials were continuously left unmonitored and unprotected.





Unattended Open Grate at the Washington Monument

On two occasions, USPP officers detected assessment team members while conducting covert site visits at the Jefferson and Lincoln Memorials. During the first incident, a contract security guard confronted assessment team members while they were opening an unsecured utility access door at the Lincoln Memorial. The second occasion occurred at the Jefferson Memorial after an assessment team member was detained after attempting to photograph a USPP officer completing a crossword puzzle for a period of time inside the Memorial's information office.

Like the Statue of Liberty, we found that the management of the CCTV system in Washington, D.C., is ineffective in providing timely surveillance information. One officer must monitor 96 CCTV cameras on a panel of television monitors for a 12-hour shift. In addition to monitoring the CCTV system, this officer provides additional collateral duties such as answering telephones and processing prisoners. During one of our visits to the office in Washington, D.C., we found no one monitoring the CCTV system. The office has no dispatch capabilities, and officers monitoring the CCTV system must communicate with the dispatcher and field personnel by portable radio.

OLESEM also noted these weaknesses in its recent policy compliance evaluation of Washington, D.C., icons. OLESEM found that a major gap continues to exist in technological improvements to the CCTV system. While a comprehensive CCTV system is in place, OLESEM stated that this system needs camera upgrades and additional staffing to be fully effective.

Surveillance Camera Room for Washington Icons

An incident that occurred at the Lincoln Memorial in August 2007 further emphasized the lack of adherence to icon security protocols. Two protestors donning costumes climbed onto the statue's lap carrying backpacks containing assorted paraphernalia and hung a banner. The incident was witnessed worldwide on the news, with one headline stating, "Lincoln Memorial Evacuated As F4J Breach US Security." The Chief of Police stated that he was satisfied with the way the incident was handled by officers and noted that the situation was resolved quickly and without the use of force. The Deputy Assistant Secretary of Law Enforcement, Security, and Emergency Management, however, questioned how this incident could have happened if USPP was following protocol and had an officer in the monument's chamber.

A video of the incident indicated that USPP officers were conspicuously absent from their post in the monument's chamber when the incident occurred. USPP officers did not arrive in the chamber until several minutes after the men climbed the statue. When officers did arrive in the chamber, they appeared to turn their backs on the protestors and put greater effort into forcing tourists out of the statue chamber.

The video also indicated that contract security personnel, present in the monument's chamber at the time of the incident, did not intervene and did not provide a visual deterrence. The security guards appeared confused and ill equipped to address the

problem. Security guards were pictured standing among onlookers, watching the incident unfold.

Protestors at the Lincoln Memorial

Security Plans

USPP has failed to establish written comprehensive security plans that would be expected of a professional federal law enforcement program responsible for protecting national icons. In April 2006, the Department established asset security requirements that included a mandate for the creation of written asset security plans that identify practices, procedures, responsibilities, and equipment used to secure each key asset. However, when we requested copies of written asset security plans from USPP for the national icons, we were only given documents that detailed staffing requirements and beat assignments.

The documents provided by USPP as icon security plans do not address incident response preparation, public safety concerns, or the interaction of USPP with other federal and local area law enforcement agencies in the event of a major incident at the icons. Without asset security plans, there is no preplanned response in the event of an emergency. During an interview with the Chief of Police, he acknowledged that the

lack of asset security plans is, "a weakness that we needed to work on." He added, "We will get something out."

Seventy-one percent of the officers we interviewed who are regularly assigned to icon security stated that security plans are not being followed. That being said, many of the officers and managers we interviewed stated that they were unaware of any written asset security plans. Twenty-nine percent of the officers we interviewed stated that their responsibilities at the icons have never been explained to them. Many of the officers stated that their post responsibilities are typically passed down from one officer to another and not presented in a formal security plan or through any formal training provided by USPP.

While we understand that the Department's mandate for written asset security plans is relatively new, this does not excuse USPP's overall lack of preparation to address threats to the national icons. Six years have passed since the tragic events of September 11, 2001, and over 4 years have passed since the President of the United States issued the *National Strategy for the Physical Protection of Critical Infrastructures and Key Assets*. Thus far, USPP has failed to prepare comprehensive asset security plans for its national icons.

Training & Qualifications

Sixty-eight percent of the officers we interviewed stated that they had not received specialized icon security training. USPP officers only attend basic police training at the Federal Law Enforcement Training Center; they do not receive asset protection or other specialized threat identification training such as the Transportation Security Administration's Screening of Passengers by Observation Technique. This technique uses behavior observation and analysis techniques to identify potentially high-risk passengers.

Officers told us that the little training they receive is provided during roll call or through some other informal manner. In Washington, D.C., on days when officers are assigned to icon duties, they do not attend roll call and therefore miss these training opportunities. Roll call training is not tracked or monitored by the USPP Training Branch.

When we began our assessment, the lieutenant serving as the security manager responsible for the national icons in Washington, D.C., had already announced his retirement. While his departure date was not scheduled until late May, he told us he had notified the Chief of Police of his retirement months in advance so that a successor could be selected and properly trained. Despite this advanced notice, USPP officials did not select his replacement until after the lieutenant retired. The lieutenant selected to

replace him told us he has no previous security training and is now in charge of overseeing the security of the three national icons in Washington, D.C. We believe this further illustrates USPP's overall lack of commitment to its icon security responsibilities.

We found that the lack of training is not isolated to icon security. Seventy-eight percent of the officers interviewed stated that their overall training needs are not being met. For instance, USPP's General Orders require that officers receive a minimum of 40 hours of training yearly, yet many of the officers we interviewed said they do not receive the minimum required training. We found that USPP recently offered its annual in-service training for the first time in almost 5 years. Additionally, officers and managers told us that there is no budget for outside training and officers must attend training classes that are free of charge.

RECOMMENDATIONS

1. NPS, along with OLESEM, should revisit its decision on how to best achieve security coverage at national icons under its purview. NPS should consider grouping the icon parks in a separate category, outside the traditional regional grouping for all security-related matters, including funding. This would allow for more specific oversight of icon parks and consistent security planning and security operations.

2. NPS should hire a qualified senior-level certified security professional to oversee NPS security operations at all icon parks, to include icon parks currently managed by USPP. Among other duties, this individual should be responsible for security, policy, and budget planning for all icon parks. OLESEM should make certain that NPS becomes compliant with the Secretary's directive regarding hiring this security manager. If it is impractical for NPS to immediately install a certified security professional, USPP should create an interim executive-level command position to oversee its icon security program.

3. NPS should ensure that trained and certified security professionals are placed at each icon park to work under the direction of the senior-level security professional. Selection of personnel for these positions should be based on their knowledge of security principles, with no requirement that they already be sworn USPP personnel assigned to the icon park.

4. NPS should conduct a thorough examination by trained certified security professionals on how best to deploy all resources to include contract security guard services at icon posts.

5. USPP should immediately assess its ability to effectively use CCTV systems at the icons. At a minimum, an increase in the number of personnel monitoring the CCTV system during a shift must be made along with the necessary upgrade of equipment, as recommended by the Department's OLESEM.

6. USPP, working with OLESEM, should immediately develop asset security plans in accordance with the Department Manual (444 DM 2), using trained and certified security professionals.

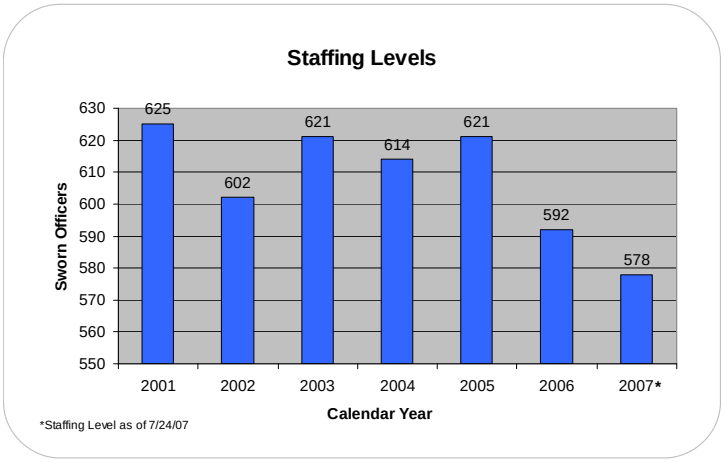
7. USPP should establish a formal training program identifying minimum security training requirements for officers, supervisors, and commanders charged with protecting the national icons. All training records should be tracked and maintained by USPP's Training Branch.

OFFICER SAFETY

Taking steps to help ensure the safety of law enforcement officers is critical due to the obvious element of potential danger associated with their mission. We were alarmed when the Fraternal Order of Police reported that 98.3 percent of survey respondents did not believe USPP was doing its best to equip and protect its officers. Officer safety issues can be difficult to assess without quantitative statistics showing actual injuries and fatalities. However, for obvious reasons, working to take proactive measures to help ensure officer safety is more desirable than taking reactive measures.

Certain officer safety issues are subjective; for example, the level of staffing necessary to ensure officer safety is a matter of judgment. Other officer safety issues are not as subjective. Having ballistic vests that meet the federal standards and meeting established weapons qualification standards are issues that are unequivocally recognized by the law enforcement community as necessities for officer safety. USPP has taken steps to meet these requirements, but these steps have fallen short of the desired goal.

STAFFING



The most prominent complaint heard throughout our interviews and from e-mail submissions involved inadequate staffing levels. We heard this complaint from all levels of USPP, with 67 percent of those interviewed stating that staffing requirements for icon security alone are not being followed. When asked how this shortage affects the organization, many of the officers stated that they believe that the lack of staffing has created officer safety and public safety issues. The officers we interviewed further explained that even a relatively small incident such as a medical emergency immediately creates a short staffing situation resulting in a potential officer safety concern. One officer wrote in an e-mail, "As a whole we are understaffed, and should an incident arise nearly all of our resources are pulled to that scene, leaving the rest of the icons and park areas without any sort of response if a second incident occurred simultaneously."

We found that despite having increased security and law enforcement responsibilities since the events of September, 11, 2001, USPP's staffing levels are lower now than they were 6 years ago. While we did not conduct an overall staffing analysis, the issues with staffing are not new to USPP. The National Academy of Public Administration has

repeatedly recommended that USPP assess its staffing needs and set priorities. While USPP has shifted its staffing priorities with its added responsibilities for icon security, it continues to struggle to adequately reach and maintain the delicate balance required to provide professional protection to the national icons while meeting its designated law enforcement obligations.

While icon security staffing requirements are not being met, even the attempt to meet them has caused significant staffing shortages in other patrol districts and among the specialty units. One officer's e-mail stated the following:

> As to personnel, we are so under staffed that the management is pulling motor units, horsemounted units, and swat units to cover different beats. We do not have enough personnel to safely protect and assist all the tourist and visitors that we have on our jurisdiction. If we have a Motor Vehicle Fatality on one of the parkways, there goes every patrol officer in that District. We are spread way to thin.

Officers provided anecdotal accounts of patrolling unfamiliar areas alone and covering entire parkways with only two patrol cars and intermittent radio coverage in the Washington metropolitan area. Some officers admitted that at times they respond to incidents differently than they would under normal circumstances because of the lack of backup assistance available. Officers interviewed from USPP specialized units reported operating without the necessary maintenance training for their specific duties.

When we asked the Chief of Police how current staffing levels affect the organization, he did not mention officer safety as a concern; rather, he stated that staffing shortages result in increased overtime costs and low morale among the force.

FIREARMS

USPP has not ensured that its officers meet minimum firearm qualification standards with their duty weapons. This problem came to our attention during a site visit to the San Francisco Field Office, where a USPP manager informed us that officers assigned to the field office had not qualified with their duty weapons in over a year. The manager told us this occurred because there was of a lack of ammunition. The manager added that the field office had repeatedly requested ammunition and had even offered to buy it themselves; however, their requests were continually denied by Headquarters' Services Division. A mid-level manager within the Training Branch, assigned to address the issue, confirmed that San Francisco Field Office officers had not qualified in over a year and the field office was no longer authorized to purchase ammunition. The mid-level manager further stated that the ammunition necessary for San Francisco Field

Office officers to qualify on their duty weapons had not been ordered as of our interview on August 9, 2007.

USPP officials provided us with a litany of excuses as to how this occurred. The Deputy Chief of the Services Division explained that the purchase of ammunition is completed centrally as part of a larger initiative to streamline the financial processes within USPP. She told us the central purchasing approach was a work-in-progress and is nearing completion. The interim allowed for certain responsibilities previously performed by the individual field offices to fall through the cracks. The Assistant Chief supported this explanation, stating that the central ordering process did not work in this instance. A mid-level manager within the Training Branch assigned to review the issue explained that the paperwork for purchasing the ammunition had been completed but never made it to the vendor, the civilian firearms instructor who formerly ordered ammunition had resigned, the major and captain positions within Training Branch were vacant, the former lieutenant was transferred, the newly assigned lieutenant had not yet taken over, and the civilian administrative personnel were few and overworked. When we asked the Chief of Police about the situation, he accepted responsibility and acknowledged that there was a lack of accountability.

Upon discovering that officers in San Francisco had not qualified on their firearms in over a year, we requested firearms qualification records for all USPP sworn officers. Records showed that 93 percent of the officers in San Francisco had not qualified with their duty weapon in over a year. While not nearly as significant of a figure, Washington and New York also had a number of officers who had not qualified in the past year, with 7 percent and 3 percent, respectively. The USPP General Orders require that officers qualify at least semi-annually at a force-approved firearms course with a force-issued handgun or other handgun authorized for the officer's use. Additionally, officers must qualify with the force-issued shotgun at least semi-annually. One officer stated, "[USPP has] numerous shotguns. No one has re-qualified on [the shotgun] for the past 2 years due to lack of space/range location to shoot the shotgun and ammunition restrictions at these locations."

Percentage of Officers Who Have Not Qualified With Their Firearm in the Past Year

San Francisco	Washington	New York
93%	7%	3%

We discovered that USPP approved a transition from a 9-millimeter duty pistol to a 40-caliber duty pistol in November 2003. In February and March 2005, a series of memoranda internal to USPP indicated that USPP officials planned to transition these weapons over a 3-year period. While command staff never established a firm completion date, we found that 67 percent of the officers we interviewed during our assessment had not been transitioned to the new 40-caliber duty weapon.

We discovered that USPP does not have a formal comprehensive weapon transition plan that officially sets guidelines for USPP's current transition from a 9-millimeter duty weapon, with a unique grip cocking mechanism, to a 40-caliber duty weapon. Sixty-two percent of the officers we interviewed consider having two different weapons among the force as an officer safety issue. Some officers discounted these concerns, explaining that USPP often works with other law enforcement agencies and there is no compatibility between weapons from agency to agency. In addition, some officers believe that situations in which the need to use another officer's weapon and have compatible ammunition are highly unlikely. The Chief of Police stated that he did not feel weapons compatibility is a safety issue and noted that officers are trained to handle all firearms used by USPP as well as other weapons officers might come into contact with in the performance of their duties. Admittedly, having two weapons among the force only presents an officer safety concern in an extreme situation; however, discounting the possibility of an improbable situation can be risky.

Ballistic Vests

We discovered that many of the ballistic vests worn by USPP officers, manufactured by First Choice Armor & Equipment, Inc., contain Zylon material. The National Institute of Justice began testing Zylon after a police officer was shot in 2003 through a ballistic vest made primarily of the material. According to the National Institute of Justice Journal, "[U]nder the 2005 interim requirements, [the National Institute of Justice] will not deem armor models containing PBO (the chemical basis of Zylon) to be compliant unless manufacturers provide satisfactory evidence to [the National Institute of Justice] that the models will maintain their ballistic performance over their declared warranty period."

The Solicitor's Office provided us with an e-mail, dated March 20, 2006, in which a sales representative from First Choice offered to replace the vests at no cost to USPP. However, as of September 1, 2007, the vests had not been replaced. It is unclear what happened in the interim; in fact, in trying to clarify the issue, the Assistant Chief told us that all of the information we had been provided up to that point was incorrect. When asked about the e-mail offer, senior management stated that the manufacturer later changed its offer verbally. Senior management claimed that First Choice insisted that USPP amortize the value of the vests and pay a portion of the cost for those vests used by USPP for a significant period of time. First Choice admitted that it later suggested that a partial payment on the used portion of the vest would be fair. These semantics hardly matter considering that USPP senior management also told us that they had never denied the replacement of a ballistic vest due to a lack of funding. Zylon has not met National Institute of Justice standards for approximately 2 years, a fact of which USPP was aware yet failed to take immediate corrective action. Negotiations between

USPP and First Choice are currently ongoing, but no formal replacement agreement has been approved.

We found that USPP has no formal written policy governing the replacement of ballistic vests issued to its officers. The Fraternal Order of Police has argued that ballistic vests should be replaced at the end of their 5-year warranty cycle and has criticized USPP for not adopting this practice. The Assistant Chief defended USPP's replacement practice, stating, "Would you replace your refrigerator simply because the warranty expired?" He explained that age alone does not determine the serviceability of the vest; rather, how the vest is worn and maintained determines how effective the vest will be.

Rather than replace the vests when their warranties expire, the Assistant Chief explained that supervisors are supposed to examine each officer's ballistic vest annually to determine its serviceability. Vests are then replaced as needed. While we found no written policy requiring ballistic vest inspections, each officer's general orders contains a ballistic vest inspection form to be completed by the officer's immediate supervisor. Thirty-nine percent of the officers we interviewed, however, stated that their vests are not inspected annually. Many officers with whom we spoke did not recognize the annual review as an inspection of the condition of their vest but rather a check of accountable property.

We learned of instances where officers who possessed unsatisfactory vests were unable to obtain a new vest issued even after supervisors approved the request. We were told that one officer, who was originally issued a vest that was too large, resorted to constructing a temporary replacement by piecing together parts from old vests obtained from USPP used property. Despite repeated efforts by the officer and the officer's supervisors, the officer was not issued a new vest for nearly 3 years. Other officers who reported having moldy vests still await replacements. One of the officers told us he brought the issue to the attention of the vest manufacturer over a year ago. The officer stated that he had received "no support from upper management on this issue" and that mold caused him a medical condition that "had to be treated by a physician."

An Officer's Moldy Vest

Although the USPP property officer stated that requests for replacement vests are normally approved, he also said requests are occasionally denied due to a lack of funds. Senior USPP officials contradicted the property manager's statement, claiming that vest replacement requests are never denied for financial reasons.

We discovered that USPP does not maintain a reliable inventory of ballistic vests that includes the date each officer was issued his/her vest. We found significant discrepancies between vest inventory lists that USPP provided to us compared to a current roster of officers. In addition we were told by an attorney in the Solicitor's Office who has been working on the Zylon issue, that USPP's ballistic vest inventory system is unreliable.

VEHICLES

Many of the officers we interviewed in the Washington, D.C., area claimed that USPP does not have enough vehicles for them to properly patrol and respond to calls for service. They also said many of the available vehicles are ill equipped to respond to emergencies.

We had received reports that officers assigned to icon security posts had been responding to calls using their personally owned vehicles. None of the officers we interviewed admitted to responding to a call using their personally owned vehicle; however, many of those officers also stated that it would be unconscionable for them not to respond to a call for assistance even though an officer had a personally owned vehicle.

Ninety-three percent of the officers we interviewed, who were assigned to the Washington metropolitan area, acknowledged driving a personally owned vehicle to their beat or post and when traveling from one beat or post to another. While there has been no formal scheduled beat or post rotation of officers assigned to icon security, officers told us that logistics sometimes require officers to move from one beat or post to another in order to backfill assignments that are short staffed.

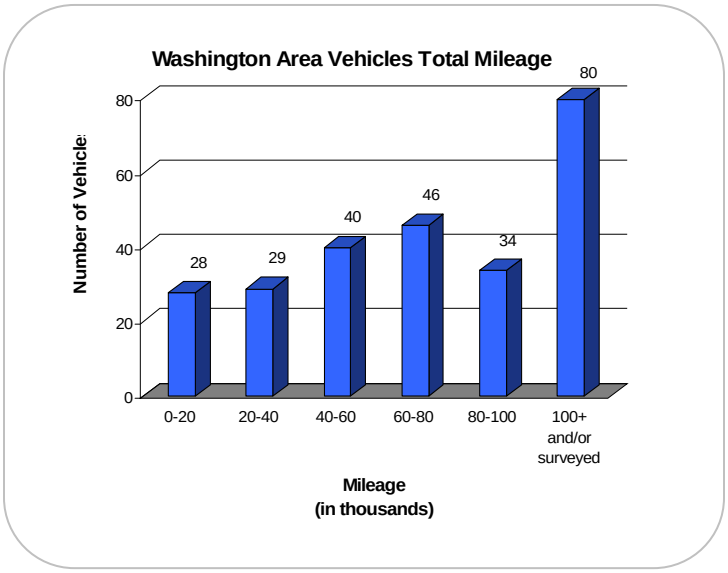
On two occasions, we witnessed officers patrolling in a USPP utility van with nothing more than a factory horn and hazard lights to use as emergency equipment. At the same time, two relatively new, well equipped police cars were parked in the parking lot of the Central District Station, not being used. We were told these vehicles were reserved for the icon security commander and a district commander, two positions that were then vacant.

Utility Van Used as a Patrol Vehicle

We found that the home-to-work car program in Washington, D.C., has resulted in an uneven distribution of cars among the working shifts. Officers told us that home-to-work cars are issued to officers based on seniority and that certain vehicles are not used for patrol due to their home-to-work status, even when available. For example, if an individual is assigned to work the duty desk and has a home-to-work vehicle, the vehicle will remain parked in the lot for the entire shift even if officers assigned to patrol do not have a vehicle. Officers also told us that not enough vehicles were available for patrol activities for one shift because a majority of the home-to-work vehicles were assigned to another shift.

One senior official commenting on the problem stated that the home-to-work car program is not a failure but, "It was probably not well thought out." The official stated further that USPP headquarters is responsible for ensuring that the appropriate number of vehicles are assigned to each district and division; the district commander is then responsible for ensuring that the cars are dispersed appropriately within the district.

Many officers we spoke with in the Washington, D.C., area expressed concern over aging vehicles used for patrol in Washington, D.C. USPP provided us with a vehicle inventory accounting for 257 vehicles in the Washington metropolitan area. Our analysis of that inventory indicated that nearly 63 percent of the 257 vehicles had over 60,000 miles and 31 percent had over 100,000 miles and/or had been taken out of service. We also found that 81 percent of those vehicles were over 3 years old, and 39 percent were over 5 years old.



In comparison, we found the Government Services Administration (GSA) that provides marked police vehicles to several federal uniformed law enforcement agencies including the Federal Protective Service and the Pentagon Police, replaces vehicles after three years and 36,000 miles, or four years regardless of mileage. The United States Secret Service Uniform Division who uses GSA vehicles reported that their replacement plan is three years and 40,000 miles, or four years if the vehicle has not reached 40,000 miles. GSA maintains no police sedan with more than 60,000 miles, regardless of age. The United States Capitol Police who maintain their own vehicle fleet have recently extended the service life of their police vehicles to seven years or 100,000 miles.

A deputy chief told us that USPP headquarters staff had not yet centralized vehicle procurement and replacement as had been done with ammunition. While the San Francisco Field Office and the New York Field Office predominantly lease their vehicles through GSA and are responsible for meeting GSA fleet requirements, the Washington Office purchases a majority of its vehicles and is therefore responsible for managing and maintaining their own fleet.

In its 2004 report to Congress and NPS, the National Academy of Public Administration panel recommended that USPP develop a multi-year replacement plan for cruisers and other capital equipment in the Washington, D.C., area. A USPP senior official told us that to date, USPP had still not instituted a formal vehicle replacement plan or transportation policy. The official informed us that USPP had drafted a replacement plan but did not formalize the plan because NPS was producing a comprehensive general fleet management plan that would apply to the entire agency. USPP officials said they elected to wait for NPS to formalize its policy even though they did not have any interim provision.

While officer safety is the main concern regarding the poor state of USPP vehicles, we also note that this situation has created a morale issue as well. Numerous officers reported that they were not only concerned for their safety, but they were also embarrassed to represent USPP in such vehicles in front of the public and other law enforcement entities.

RECOMMENDATIONS

8. USPP must re-evaluate staffing levels, working to alleviate officer safety concerns either through new hires or through a redistribution of personnel. Redistribution of officers must take into consideration mission priorities and risks associated with particular assignments.

9. USPP should develop and promptly execute a plan to complete its weapons transition. The plan should address the potential safety concerns of having two different weapons and identify a transition schedule, setting a final date of completion for the transition.

10. USPP should develop and maintain a system that effectively tracks firearms qualifications and notifies Command Staff when these qualifications are not being met. USPP should also ensure that adequate ammunition and firearms range facilities are available to facilitate timely firearms qualifications.

11. USPP should continue to work with the Solicitor's Office in a cooperative and proactive manner and ensure that each and every USPP officer is wearing a ballistic vest that meets National Institute of Justice standards and does not contain Zylon as soon as possible.

12. USPP should maintain a reliable inventory of ballistic vests issued to officers. This inventory should include the issue date, the warranty expiration date, and any reported problems with the vest.

13. USPP should develop an interim vehicle replacement plan in an effort to manage its government vehicles in a safe and fiscally prudent manner while awaiting the specific detailed NPS vehicle replacement plan that will be mandatory upon completion.

14. USPP should re-examine its home-to-work vehicle policy to determine whether the program is necessary for emergency response and whether the program allows for the most efficient use of the USPP fleet.

FINANCIAL MANAGEMENT

USPP's operational budget has remained consistent throughout the last 4 fiscal years with the exception of a $5 million increase in its fiscal year 2007 budget request. In addition, from fiscal year 2004 through fiscal year 2007, USPP has received $4.4 million in reimbursements, about $2.8 million from Emergency Law and Order funding and nearly $155,000 from individual parks.

USPP Appropriations 2004-2007

FY 2004 - $78 million
FY 2005 - $80 million
FY 2006 - $80 million
FY 2007 - $85 million

In 2001, Congress created a new appropriation for USPP operations, which established a USPP budget separate from NPS' National Capital Region. As a result of this separation, USPP became responsible for administrative services that were previously encompassed under the National Capital Region. This directive required USPP to take control over the management of its appropriation and reorganize its infrastructure to carry out these services.

We found that once given this responsibility, USPP failed to put the proper infrastructure in place to successfully manage its own financial affairs. Specifically, we found that USPP did not use sound business practices for planning, accounting for, and monitoring the use of funds.

BUDGET FORMULATION & EXECUTION

Over the last few years, USPP experienced severe budget and financial difficulties. After interviewing a substantial part of the force and civilian employees, the general perception across USPP was that some malfeasance occurred and that USPP is not effectively projecting its budget needs or properly managing its appropriated funds. A primary factor behind USPP's budget breakdown was its inexperience at managing its own funds and the lack of oversight by a qualified individual proficient in the skills required to manage USPP's appropriation.

A budget office with proper qualifications and skills should possess the ability to accurately report or forecast an organization's budget at any given time. The budget and financial process, and decisions made regarding that process, can have a substantial effect on the efficiency of an operation as well as long-term influences. USPP failed to use the required tools to administer a successful budget and finance function and, therefore, failed to safeguard the financial integrity of its program.

During fiscal year 2005, USPP's inability to properly forecast and track its budgetary needs resulted in a year-end shortfall of approximately $650,000. The Assistant Chief explained that the Financial Operations Officer told him that USPP was operating on a budget surplus throughout the year, when in reality USPP was operating at a deficit. This mistake required assistance from NPS headquarters and the National Capital

Region to make certain that funds were available to cover USPP obligations and ensure a successful year-end closing of USPP's financial records. To accomplish this, the $650,000 of costs incurred by USPP was transferred to the National Capital Region; the NPS Washington Office then provided the National Capital Region with additional funding to cover these unexpected costs.

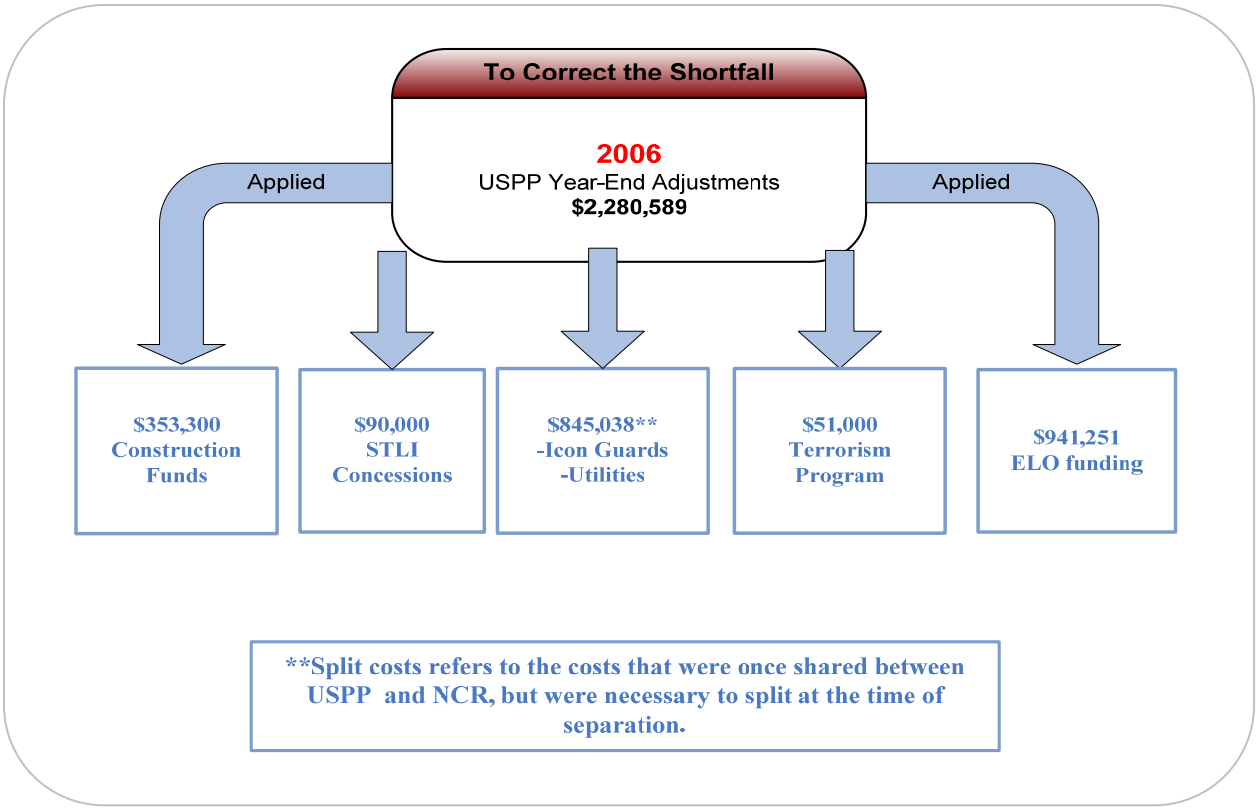
Apparently, USPP did not learn from its mistakes in fiscal year 2005, as it faced another budget deficit at the end of fiscal year 2006. Again, throughout 2006, USPP management was under the impression that it was operating on a budget surplus. However, at the end of the year, the NPS Washington Office and the National Capital Region were forced to intervene, aiding USPP in adjusting its $2.3 million shortfall at year end, to avoid a potential Anti-Deficient Act violation. Aside from relying on NPS to balance its budget, USPP budget projections ranged from a $6 million surplus to over a $2 million deficit within a few months' time. This range of $8 million, in relation to an $80 million appropriation, is unacceptable. According to a USPP official, the fiscal year 2005 and fiscal year 2006 shortfalls were a consequence of USPP's former Financial Operations Officer's failure to project and track budgetary expenditures and requirements. However, the former Financial Operations Officer said that USPP budget issues did not begin during her tenure and that USPP's troubles existed long before she began her employment at USPP.

NPS funded the $2.3 million shortfall through several avenues, including the following: using Emergency Law and Order funds, transferring costs incurred by USPP (that were split between USPP and the National Capital Region at the beginning of the USPP separation) back to the National Capital Region, using construction funding from contracts that were delayed, using Statue of Liberty concessions program funding that was set aside by the park for overtime, and using terrorism program funding available from fiscal year 2002 funding (See chart on following page).

According to USPP and NPS managers, Emergency Law and Order funding was available for unforeseen situations where law enforcement was necessary. Officials from the NPS Budget Office stated that NPS is authorized to use Emergency Law and Order funds through Public Law 102-381, which states the following:

> That hereafter, any funds available to the National Park Service may be used, with the approval of the Secretary, to maintain law and order in emergency and other unforeseen law enforcement situations and conduct emergency search and rescue operations in the National Park System….

Typically, funding requests for recurring events, such as the International Monetary Fund and World Bank protests, are already included in the budget request and are pre-planned, but there are times when an event is unexpected, and, if not reimbursed, USPP may request Emergency Law and Order funding.



The NPS Comptroller told us that in fiscal year 2006, unforeseen events, such as the immigration demonstration, were inappropriately funded throughout the year using USPP's operating budget. Thus, Emergency Law and Order funds were later used to readjust USPP's resulting budget shortfall. These adjustments were authorized in an NPS memo from the NPS Comptroller to the Assistant Secretary for Fish, Wildlife, and Parks, dated September 29, 2006. The memo stated that these expenditures could be absorbed using the unobligated balance remaining in NPS' annual operating appropriation. The memo also stated, if necessary, any expenditures that could not be absorbed in the annual appropriation could be transferred to the "Construction" appropriation.

Further highlighting USPP's poor planning and budget execution, in fiscal year 2005, USPP received an appropriation increase of $2 million, which included $500,000 that USPP identified as needed for new officers to staff the Statue of Liberty reopening. Although USPP hired new recruits in 2005, USPP did not assign any new officers to the Statue of Liberty and NPS spent over $500,000 in USPP overtime costs. Despite its $2 million appropriation increase, USPP did not have enough funding to cover these overtime costs. Furthermore, in 2006, USPP had not scheduled any new officers to be placed at the Statue of Liberty, and USPP again did not have enough funding to cover overtime costs. Ultimately, after the approval of the NPS Comptroller, USPP transferred its additional overtime costs of $90,000 to NPS so that USPP could successfully balance its 2006 budget.

ACCOUNTABILITY

One of the most significant responsibilities for a finance office is to ensure a successful year-end close out. If not for the aid from NPS, this would not have occurred for USPP in both fiscal years 2005 and 2006. The consequences of failing to successfully close out at year-end are considerable and can have a negative impact on USPP, its future, and its capacity to manage its appropriation. According to USPP management, USPP's budget problems began when USPP separated from the National Capital Region. Since the separation, those responsible for managing USPP's budget have lacked the experience and knowledge needed to forecast, monitor, and expend federal funds.

The Office of Management and Budget Circular No. A-123, *Management's Responsibility for Internal Control*, states that federal employees must ensure that government resources are used efficiently and effectively to achieve intended program results. In addition, resources must be used in compliance with laws and regulations and with minimal potential for waste, fraud, and mismanagement.

As a result of concerns raised by NPS' Accounting Operations Center, NPS' contracting office initiated a review of USPP procurement activities. After its preliminary review, the contracting office took measures to suspend USPP contract and purchase card authority in May 2006. The contracting office then conducted a more detailed review of USPP procurement files and found USPP procurement operations to be significantly deficient and inconsistent with Federal Acquisition Regulations and USPP policy, jeopardizing procurement integrity and NPS' rights and responsibilities in its business relationships.

The review resulted in multiple findings regarding both the procurement and financial functions. The most troublesome procurement findings included the following: (1) internal controls were absent; (2) the Interior Department Electronic Acquisition System, a required NPS database, was not used during the requisition phase of the procurement process; and (3) contracting files did not contain supporting documentation required by law, regulation, and policy. Furthermore, the financial findings included the following; (1) the finance office lacked appropriate separation of duties; (2) invoices were stamped for payment but lacked the approval signature and date; and (3) funds were inappropriately deobligated at the end of the last 2 fiscal years.

In addition to the contracting office review, the NPS Deputy Director requested that an NPS official conduct an additional review to evaluate the state of the USPP budget and finance office. The official found USPP to be in a state of uncertainty, with employees unaware of their roles and responsibilities. The official also found a lack of historical data and a lack of administrative policy and procedural manuals. This NPS official spent several months reviewing and reconciling the agency's expenditures, while

performing several other functions, and found that USPP failed to adequately and accurately project budget expenditures. These inaccuracies led to management's false perception that there was sufficient funding to cover all costs. According to NPS, there was no analysis of the projected payroll costs, thus inflating the amount of funding available.

Once the NPS official discovered that USPP did not have enough funds available to cover the year-end shortfall, the official informed USPP management of its impending deficit in June 2006, only to watch USPP allow the situation to worsen. Unfortunately, USPP did not address this shortfall until September which added preventable stress to the situation. Rather than rectifying the situation early on, after several warnings from NPS and NCR budget experts, USPP chose to ignore warnings.

According to the NPS Director, to address the situation, NPS compiled a recovery plan to ensure that USPP finance issues were properly resolved. NPS also withdrew USPP purchase authority, moved USPP's contract acquisition function under the NPS Washington Office, and requested that the National Capital Region provide earnest oversight and authority over USPP budget and finance functions until USPP hired a qualified individual to manage its budget.

Internal controls serve as the first line of defense in safeguarding assets and preventing and detecting errors and fraud. According to GAO, *Standards for Internal Controls*, transactions should be promptly and accurately recorded. In addition, all transactions need to be clearly documented and readily available for examination and the documentation should appear in management directives, administrative policies, and operating manuals. All documentation and records should be properly managed and maintained, and effective communications should occur with information flowing down, across, and up the organization. As found by NPS, USPP failed to achieve these essential standards and minimized its probability of discovering fraud or misuse. Without proper internal controls, USPP funding has a high risk of fraud.

RECOMMENDATIONS

15. USPP should hire a finance professional with strong budget formulation and execution skills.

16. USPP should take actions to be in compliance with GAO, *Standards for Internal Controls* regarding properly managing transactions and documentation.

MANAGEMENT

Trust and integrity are cornerstones to a law enforcement agency's success. In fact, when defining agency values, USPP's Web site states that "integrity, honor and service are the foundation of everything we do." However, we found an environment of distrust where employees question the ability of senior management to lead USPP.

Although we did not conduct an in-depth review of USPP management practices, the problems we discovered during the assessment, and the comments made to us, indicate a systemic lack of management and oversight by senior agency officials that impacts the ability of the agency to function as its mission statement intends.

AGENCY MORALE & CONFIDENCE IN COMMAND STAFF

Numerous officers, civilian staff, and managers commented on the agency's low morale during interviews and through e-mails. Many of these employees stated that morale is the lowest it has ever been during their employment with USPP. Our analysis of USPP employee exit surveys provided evidence of the declining level of morale. In the exit survey, employees were asked to rank morale on a scale of 1 to 5. Our analysis showed that the average morale ratings decreased steadily from 4.11 in 2005, to 3.47 in 2006, and finally to 2.71 in 2007.

When we asked the Chief of Police how he would describe agency morale, he replied, "Morale is what you make it," and said that overall, he felt morale was good. He also added, "No one has missed a check." When we informed him that our interviews indicated otherwise, he stated, "Morale is all about perception."

Actually, one of the contributing factors to the agency's morale problem is a lack of confidence in command staff. The Fraternal Order of Police survey found that only 5 percent of survey respondents had confidence in USPP Command Staff and only 2.2 percent had confidence in the Chief of Police. We also noted this distinct lack of faith in the command staff during the course of our interviews. We received numerous e-mails from officers and employees providing their assessment of command staff with one employee stating that "the USPP is in desperate need of strong, honest, responsible, dedicated management." Another employee wrote that "leadership is spotty to nonexistent."

The command staff exhibited this lack of confidence as well. When we asked one senior-level officer what actions needed to be taken to improve USPP, the individual indicated that removing the Chief of Police would be a good start. Another senior-level officer stated that a significant amount of negativity originates from the Chief's office, which has resulted in many people leaving because they feel demoralized. The Chief admitted that he is critical of employees on a number of issues because he finds that when he acts favorably toward employees, they in turn expect favors from him.

We believe the lack of confidence in the command staff is also reflected in the fact that during the course of our assessment, we saw the retirement of the assistant chief, two of the three deputy chiefs, two majors, and two captains. While we were told that this change in staff is rare and that the high number of resignations of senior staff is merely a timing issue, we believe the situation may be indicative of a more serious morale issue facing USPP.

While the Chief sees this as an opportunity for change within USPP, he has no immediate plans for filling these positions. We are concerned that the high number of retirements of senior staff, in a relatively short period of time, has left a void in what was already weak leadership and will hinder the agency in addressing the many issues it faces. The Chief has expressed concern that as an agency, USPP does not prepare its personnel to be leaders. As a result, prospective commanders may not have the necessary experience to assume senior leadership positions. He also told us that he is concerned that if he leaves, no one will be capable of replacing him as the chief of police.

Communication

We found that poor communication between senior management and field personnel has been a contributing factor to the lack of confidence in command staff and low morale. Officers and managers alike commented on the overall lack of communication within the organization. One manager commented that the Chief, Assistant Chief, and Deputy Chiefs have isolated themselves from the rest of the Department.

When we asked the Chief what action he had taken as a result of the negative results of the Fraternal Order of Police employee survey, he told us he is visiting field offices and speaking to the officers. However, when we interviewed officers and asked if the Chief had performed any outreach, most, if not all, said he had not; some even laughed in response to the question. One employee e-mailed us, stating that "despite unprecedented moral[e] problems, the chief of police has not come to visit the [New York Field Office] in 4 years." We noted that shortly after we received this e-mail, the Chief made a brief appearance at a table-top exercise held at Ellis Island in June 2007.

Even the Chief of Police acknowledged that communication within the agency is "not as good as it should be." When asked to provide an example of the breakdown in communication, the Chief recalled a recent meeting with command staff where he realized that many were unfamiliar with the budget process; he said several of the attendees did not know for what year the agency was currently formulating the budget.

QUALITY CONTROL

USPP does not have a formal quality control program to ensure that its operations are performed in accordance with established policies, procedures, and professional standards. While USPP does have an Audits and Evaluations unit, this unit reviews specific individual activities, such as evidence, property, and imprest funds. The unit does not conduct comprehensive inspections of offices to ensure compliance with agency policies. Officials told us a formal program had not existed in years and they could not recall the last time USPP conducted field office inspections.

The importance of a quality control program for law enforcement agencies is clearly defined in the Commission on Accreditation for Law Enforcement Agencies, Inc., standards. These recognized law enforcement standards used by federal, state, and local agencies explain that a formal inspection process "is an essential mechanism for evaluating the quality of the agency's operations; ensuring that the agency's goals are being pursued; identifying the need for additional resources; and ensuring that control is maintained throughout the agency." Inspections further benefit the agency by providing senior management and supervisors with a means of regularly assessing the agency's efficiency and effectiveness. The Chief told us that one of his goals over the next 2 years is to obtain accreditation for the agency through the Commission on Accreditation for Law Enforcement Agencies, Inc., which would enhance the credibility and integrity of USPP operations.

RECOMMENDATIONS

17. USPP management should develop and execute plans to improve communication throughout the organization. Plans should consider periodic site visits by all levels of management, methods to identify and address employee concerns, and centralized methods for dissemination of agency information and policy.

18. USPP should conduct formal quality control inspections annually and devise a plan for inspections to be completed at all locations within the next year.

19. USPP should pursue its goal to receive accreditation from the Commission on Accreditation for Law Enforcement Agencies, Inc.

20. The National Park Service Director, working in conjunction with the Deputy Assistant Secretary for Law Enforcement, Security, and Emergency Management should immediately assess whether the current Chief of the USPP is equipped to effectively advance the mission and operations of the agency.

RECOMMENDATIONS

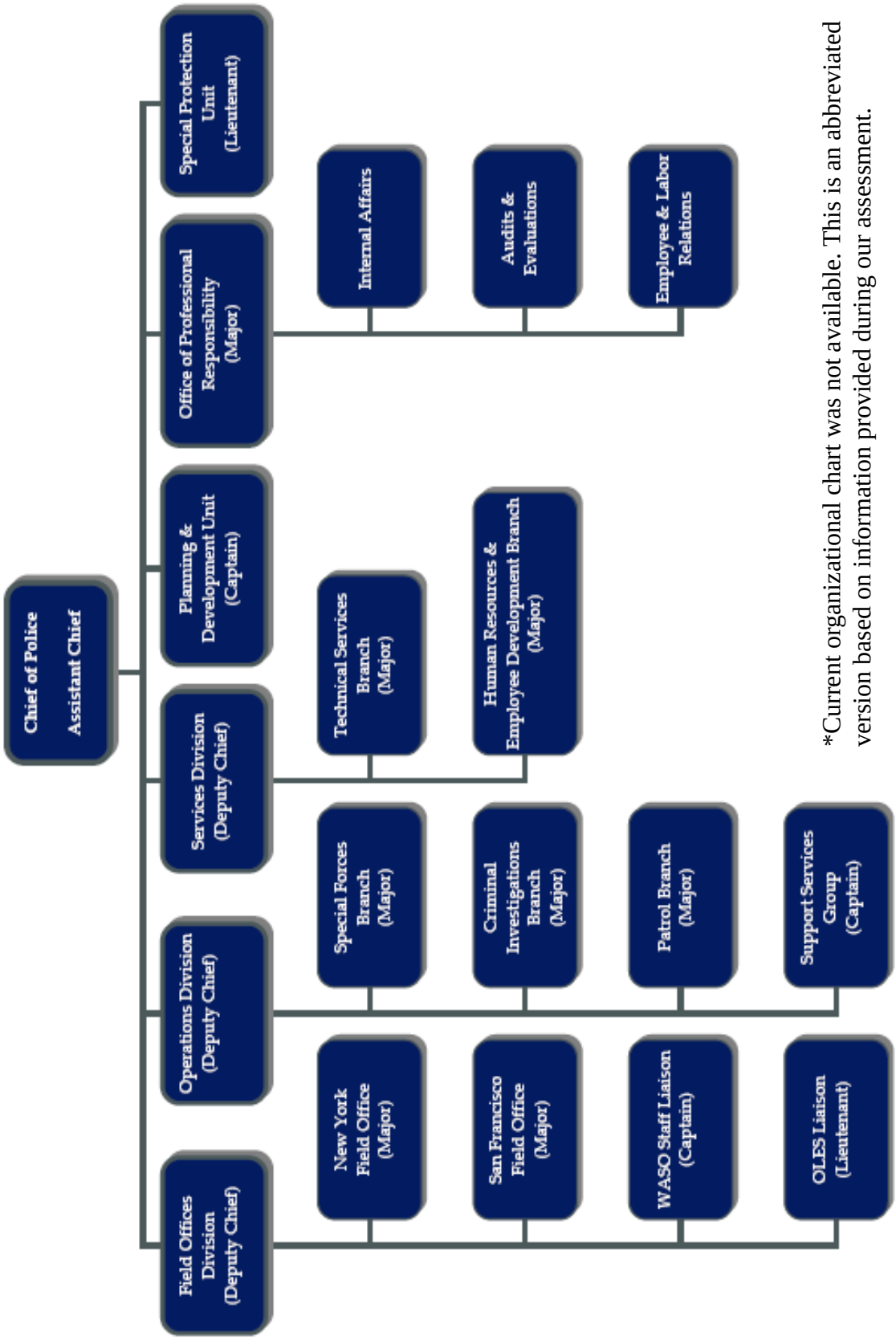
Number	Recommendation	Page Number
1	NPS, along with OLESEM, should revisit its decision on how to best achieve security coverage at national icons under its purview. NPS should consider grouping the icon parks in a separate category, outside the traditional regional grouping for all security-related matters, including funding. This would allow for more specific oversight of icon parks and consistent security planning and security operations.	18
2	NPS should hire a qualified senior-level certified security professional to oversee NPS security operations at all icon parks, to include icon parks currently managed by USPP. Among other duties, this individual should be responsible for security, policy, and budget planning for all icon parks. OLESEM should make certain that NPS becomes compliant with the Secretary's directive regarding hiring this security manager. If it is impractical for NPS to immediately install a certified security professional, USPP should create an interim executive-level command position to oversee its icon security program.	18
3	NPS should ensure that trained and certified security professionals are placed at each icon park to work under the direction of the senior-level security professional. Selection of personnel for these positions should be based on their knowledge of security principles, with no requirement that they already be sworn USPP personnel assigned to the icon park.	18
4	NPS should conduct a thorough examination by trained certified security professionals on how best to deploy contract security guard services at icon posts.	18
5	USPP should immediately assess its ability to effectively use CCTV systems at the icons. At a minimum, an increase in the number of personnel monitoring the CCTV system during a shift must be made along with the necessary upgrade of equipment, as recommended by the Department's OLESEM.	19
6	USPP, working with OLESEM, should immediately develop asset security plans in accordance with the Department Manual (444 DM 2), using trained and certified security professionals.	19

7	USPP should establish a formal training program identifying minimum security training requirements for officers, supervisors, and commanders charged with protecting the national icons. All training records should be tracked and maintained by USPP's Training Branch.	19
8	USPP must re-evaluate staffing levels, working to alleviate officer safety concerns either through new hires or through a redistribution of personnel. Redistribution of officers must take into consideration mission priorities and risks associated with particular assignments.	28
9	USPP should develop and promptly execute a plan to complete its weapons transition. The plan should address the potential safety concerns of having two different weapons and identify a transition schedule, setting a final date of completion for the transition.	28
10	USPP should develop and maintain a system that effectively tracks firearms qualifications and notifies Command Staff when these qualifications are not being met. USPP should also ensure that adequate ammunition and firearms range facilities are available to facilitate timely firearms qualifications.	28
11	USPP should continue to work with the Solicitor's Office in a cooperative and proactive manner and ensure that each and every USPP officer is wearing a ballistic vest that meets National Institute of Justice standards and does not contain Zylon as soon as possible.	28
12	USPP should maintain a reliable inventory of ballistic vests issued to officers. This inventory should include the issue date, the warranty expiration date, and any reported problems with the vest.	28
13	USPP should develop an interim vehicle replacement plan in an effort to manage its government vehicles in a safe and fiscally prudent manner while awaiting the specific detailed NPS vehicle replacement plan that will be mandatory upon completion.	28
14	USPP should re-examine its home-to-work vehicle policy to determine whether the program is necessary for emergency response and whether it allows for the most efficient use of the USPP fleet.	28
15	USPP should hire a finance professional with strong budget formulation and execution skills.	33

16	USPP should take actions to be in compliance with GAO, *Standards for Internal Controls* regarding properly managing transactions and documentation.	33
17	USPP management should develop and execute plans to improve communication throughout the organization. Plans should consider periodic site visits by all levels of management, methods to identify and address employee concerns, and centralized methods for dissemination of agency information and policy.	36
18	USPP should conduct formal quality control inspections annually and devise a plan for inspections to be completed at all locations within the next year.	36
19	USPP should pursue its goal to receive accreditation from the Commission on Accreditation for Law Enforcement Agencies, Inc.	36
20	The National Park Service Director, working in conjunction with the Deputy Assistant Secretary for Law Enforcement, Security, and Emergency Management should immediately assess whether the current Chief of the USPP is equipped to effectively advance the mission and operations of the agency.	36

USPP ORGANIZATIONAL STRUCTURE

Appendix 1



*Current organizational chart was not available. This is an abbreviated version based on information provided during our assessment.

How to Report
Fraud, Waste, Abuse and Mismanagement

Fraud, waste, and abuse in government are the concern of everyone, Office of Inspector General staff, departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and abuse related to departmental or Insular Area programs and operations. You can report allegations to us by:

Mail: **U.S. Department of the Interior**
Office of Inspector General
Mail Stop 5341-MIB
1849 C Street, NW
Washington, DC 20240

Phone:

24-Hour Toll Free	**800-424-5081**
Washington Metro Area	**703-487-5435**
Fax	**703-487-5402**

Internet: http://www.doioig.gov/form/hotlinecmp_form.php

U.S. Department of the Interior
Office of Inspector General
1849 C Street, NW
Washington, DC 20240

www.doi.gov
www.doioig.gov