

January 17, 2018

MEMORANDUM

TO: Matthew R. Verderosa,
Chief of Police

FROM: Fay F. Ropella, CPA, CFE
Inspector General



SUBJECT: *Management Advisory Report: Potential Vendor Violation of United States Capitol Police Acquisition Policy* (Report Number: OIG-2018-07)

During a January 2, 2018, limited review of websites of vendors claiming to do business with the United States Capitol Police (USCP or the Department), the Office of Inspector General (OIG) found activity that may be in violation of standard contractual terms and conditions outlined in *USCP Acquisition Policy*¹, dated September 20, 2011.

USCP interim guidance includes a standard term and condition titled “*Prohibition on Release of Information of Award*” which restricts vendors from making advertisements or other information available about the contract with the Department. Specifically, the guidance states:

Prohibition on Release of Information of Award:

No news releases, press conferences, or advertisements pertaining to the award of this order or the work performed or delivered under this order will be made without prior written approval of the Contracting Officer. This includes the use of information concerning the award in websites, catalogs, or other promotional material produced by the vendors or its employees.

If written authorization for use is provided, the announcement shall be composed in such a manner as not to state or imply that the product or service provided is endorsed or preferred by the USCP or is considered by the USCP to be superior to other products or services.

According to the USCP Procurement Officer, the Department has not provided written authorization to any vendor to release information related to a USCP award or work. Yet, OIG identified 12 websites with information related to vendors doing business with USCP. For example, [REDACTED] had a lengthy description of [REDACTED] support

¹ Interim Policy was not numbered [REDACTED]

[REDACTED] There was no date for when this information was published.

services provided to the Department stating, "The United States Capitol Police (USCP) was facing [REDACTED] operational setbacks due to the loss of experienced federal [REDACTED], a shortage of quality contractors with [REDACTED], and the low productivity from new [REDACTED] who were developing... USCP sought out the help of [REDACTED] to tackle these challenges because of our excellent reputation in the market."

[REDACTED] also stated, "USCP recognizes the [REDACTED] as an essential and proven strategic partner." Even if the vendor had received written approval from the Contracting Officer, as required by the standard terms and conditions listed in the interim guidance, this post seems to imply that USCP prefers the work of [REDACTED] or that [REDACTED] is superior to other vendors.

This appears to be a direct violation of the standard terms and conditions listed in the interim guidance which specifically states, "If written authorization for use is provided, the announcement shall be composed in such a manner as not to state or imply that the product or service provided is endorsed or preferred by the USCP or is considered by the USCP to be superior to other products or services."

In another instance, [REDACTED] posted a note attributed to the Chief of Police which discussed the professionalism of [REDACTED] employees who work in the USCP headquarters building. The same website attributed a USCP Sergeant with a remark on the professionalism of a [REDACTED] employee during the 2011 summer concert series.

Other vendor websites listed the Department as one of their clients:



Publicly available information related to specific Department contracts could undermine the Department's mission. Furthermore, absent specific written approval from the Contracting Officer, this information is in violation of the standard terms and conditions listed in the interim guidance. Thus, OIG recommends the following:



Recommendation 1: We recommend that the United States Capitol Police determine whether the information identified in this report is in violation of the contracts with vendors and take appropriate action.

Recommendation 2: We recommend that the United States Capitol Police design controls that periodically check for contract violations, such as performing an annual internet search to identify any vendors using information related to Department contracts.

Our limited analysis focused on information found on the internet as of January 2, 2018. Because of the nature and brevity of this work, OIG did not conduct this work in accordance with generally accepted government auditing standards. Had we followed such standards, other matters might have come to our attention.

cc: Assistant Chief Steven A. Sund, Chief of Operations
Mr. Richard Braddock, Chief Administrative Officer
[REDACTED] Audit Liaison