



# UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

## Assessment of the United States Capitol Police Workforce Diversity

Report Number OIG-2018-12

June 2018

### ~~REPORT RESTRICTION LANGUAGE~~

~~Distribution of this Document is Restricted~~

~~This report may contain sensitive law enforcement information and/or is part of the deliberative process privilege. This is the property of the Office of Inspector General and is intended solely for the official use of the United States Capitol Police, the Capitol Police Board, or any agency or organization receiving the report directly from the Office of Inspector General. No Secondary distribution may be made, in whole or in part, outside the United States Capitol Police or Capitol Police Board, by them or by other agencies or organizations, without prior authorization by the Inspector General or the Capitol Police Board.~~



**OFFICE OF INSPECTOR GENERAL**

**PREFACE**

The Office of Inspector General (OIG) prepared this report pursuant to the Inspector General Act of 1978, as amended. It is one of a series of audits, reviews, and investigative and special reports OIG prepares periodically as part of its oversight responsibility with respect to the United States Capitol Police (USCP) to identify and prevent fraud, waste, abuse, and mismanagement.

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

We developed our recommendations based on the best knowledge available to OIG and discussed in draft with those responsible for **implementation**. It is my hope that the recommendations will **result** in more effective, efficient, and/or economical operations.





I express my appreciation to those contributing to the preparation of this report.

Michael A. Bolton,  
Acting Inspector General



## TABLE OF CONTENTS

	<u>Page</u>
Abbreviations and Acronyms	iii
Executive Summary	1
Background	2
Objectives, Scope, Methodology	5
Results	7
Department Diversity Program	7
Complaint /Discrimination Data	25
Status of Previous Recommendations	29
Appendices	33
Appendix A – List of Recommendations	34
Appendix B – Department Comments	35
Appendix C – Office of Compliance, The Dispute Resolution Process	36
Appendix D – USCP Complaint Process	37
Appendix E – USCP Senior Leadership Development Programs	38
Appendix F – EEO MD-715 Elements and USCP Fulfillment	39
Appendix G – GAO’S Leading Practices for Diversity Management and USCP Fulfillment	42
Appendix H – USCP Recruiting Activity for CY 2017	43

## Abbreviations and Acronyms

Alternative/Administrative Dispute Resolution <sup>1</sup>	ADR
Architect of Capitol	AOC
Assistant Chief of Police	ACOP
Bureau Commander	BC
Calendar Year	CY
Capitol Police Board	Board
Chief Administrative Officer	CAO
Chief of Police	COP
Civilian Pay	CP
Collective Bargaining Agreement	CBA
Commission on Accreditation for Law Enforcement Agencies	CALEA
Congressional Accountability Act	CAA
	
Disciplinary Review Officer	DRO
	
Employment Law Division	ELD

<sup>1</sup> The Office of Compliance refers to ADR as both the Alternative Dispute Resolution and Administrative Dispute Resolution.

Equal Employment Opportunity	EEO
Equal Employment Opportunity Commission	EEOC
Equal Employment Opportunity Management Directive 110	EEO MD-110
Equal Employment Opportunity Management Directive 715	EEO MD-715
	
Public Safety Leadership	PSL
Fiscal Year	FY
Government Accountability Office	GAO
House of Representatives	House
Office of Accountability and Improvement	OAI
Office of Attending Physician	OAP
Office of the Chief of Police	OCOP
Office of Compliance	OOC
Office of Employment Counsel	OEC
Office of the General Counsel	OGC
Office of Human Resources	OHR
Office of Inclusion, Diversity, Equity and Action	IDEA
Office of Inspector General	OIG
Office of Personnel Management	OPM

Office of Professional Responsibility	OPR
Senior Executive Service	SES
Standard Operating Procedure	SOP
Supervisory Leadership Training Program	SLTP
Sworn Pay	LP
United States Capitol Police	USCP or the Department
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]

---

## EXECUTIVE SUMMARY

---

Title VII of the Civil Rights Act of 1964, as amended, protects applicants and employees from discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment on the basis of race, color, religion, sex (including pregnancy), or national origin. The Act established the Equal Employment Opportunity Commission (EEOC) to assist in the protection of U.S. employees from discrimination. Equality in employment practices is about ensuring individuals, applicants, candidates, and employees are treated fairly and consistently. Diversity in employment practices is about recognizing and respecting differences.

In accordance with our *Annual Performance Plan Fiscal Year (FY) 2018*, Report Number OIG-2018-01, the Office of Inspector General (OIG) assessed the United States Capitol Police (USCP or the Department) workforce diversity. Our objectives were (1) determine if the Department properly designed a diversity program that would yield desired results, (2) evaluate the accuracy and completeness of complaints and discrimination data reported to stakeholders, and (3) assess the status of recommendations made in the previous diversity audit.<sup>2</sup> Our scope included program policies in effect as of January 2, 2018, and data collected during the five previous years, calendar years 2012 through 2017.

Although not required, the Department implemented some of the EEOC and Government Accountability Office best practices for establishing and maintaining effective diversity and equal employment opportunity program. The Chief of Police is committed to diversity and believes that by continuing to follow best practices USCP will develop an environment of diversity.

The Department did not design a diversity program that completely measures desired program results. Without Department policies for identifying specific program objectives in alignment with best practices and measurement procedures, the Department cannot be certain that they are accomplishing diversity goals.

The Department did not have an integrated system for collecting data related to equality or diversity issues. Although the Department's Office of Professional Responsibility (OPR) collects and reports complaints and discrimination issues, Department employees have not historically reported all complaints to OPR. The Congressional Accountability Act allows employees to elect to report complaints to the Office of Compliance. Without a mechanism for consistently collecting data related to equality or diversity issues, the Department cannot accurately measure discrimination data.

The Department did not maintain the corrective actions implemented to close the recommendations related to Report Number OIG-2008-05, the previous workforce

---

<sup>2</sup> *Audit of United States Capitol Police Workforce Diversity*, OIG-2008-05, dated July 2008.

diversity audit. That audit made four recommendations. OIG closed recommendations in March 2010 when the Department presented evidence through the audit resolution process that corrective actions were complete. Through this assessment, however, OIG identified lapses in corrective actions that impaired the closed status of two previous recommendations.

On May 31, 2018, OIG provided a draft report to Department officials for comment, and conducted an exit conference on June 7, 2018. We incorporated the Department's comments as applicable and attached the response to the report in its entirety in Appendix B.

## **Background**

The United States Capitol Police (USCP or the Department) established a Diversity Office in January 2010 in response to the Office of Inspector General (OIG) report, *Audit of United States Capitol Police Workforce Diversity*, OIG-2008-05, dated July 2008. The Diversity Office experienced several vacancies during its first 6 years. The current Diversity Officer has been in the position since March 2016. According to the position description, responsibilities of the Diversity Officer include developing and implementing a comprehensive workplace diversity program that will ensure equal employment opportunity (EEO) within the Department and achieve a workforce reflective of a diverse labor market. The Diversity Officer must also establish a mechanism for monitoring the progress of the Department's efforts in achieving workforce diversity. In January 2018, the Diversity Office changed its name to the Office of Inclusion, Diversity, Equity and Action (IDEA). IDEA consists of two employees—the Director and one staff member.

According to the Department's intranet, IDEA's vision is:

As the diversity, inclusion, and equity vision for the Department develops, we envision providing the following services in a concerted effort to leverage the skills, abilities, and talents of the USCP workforce:

- Reasonable Accommodation Management
- Training
- Professional Development
- Mentoring and Coaching
- Employee Resource Groups
- Speaker Series
- Policy Review

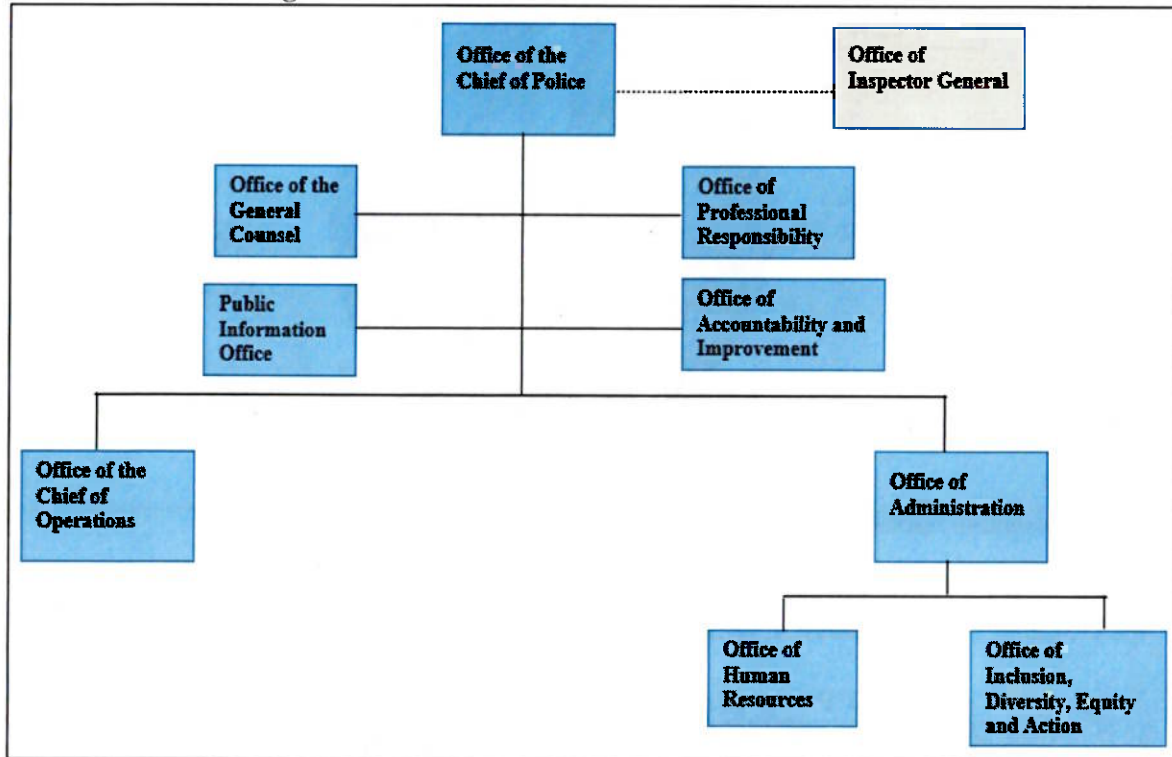
The Department welcomes the diverse insights of our employees in how best to promote a successful workforce and the fulfillment of our important mission.

As shown in Exhibit 1, IDEA reports to Office of Administration. Discrimination issues are reported to the Office of Professional Responsibility (OPR). The Employment Law



Division (ELD), previously known as the Office of Employment Counsel (OEC), does not receive complaints, and merged with Office of the General Counsel (OGC) as of January 1, 2018. Both OPR and OGC report directly to the Chief of Police (COP).

### Exhibit 1: USCP Organization Structure

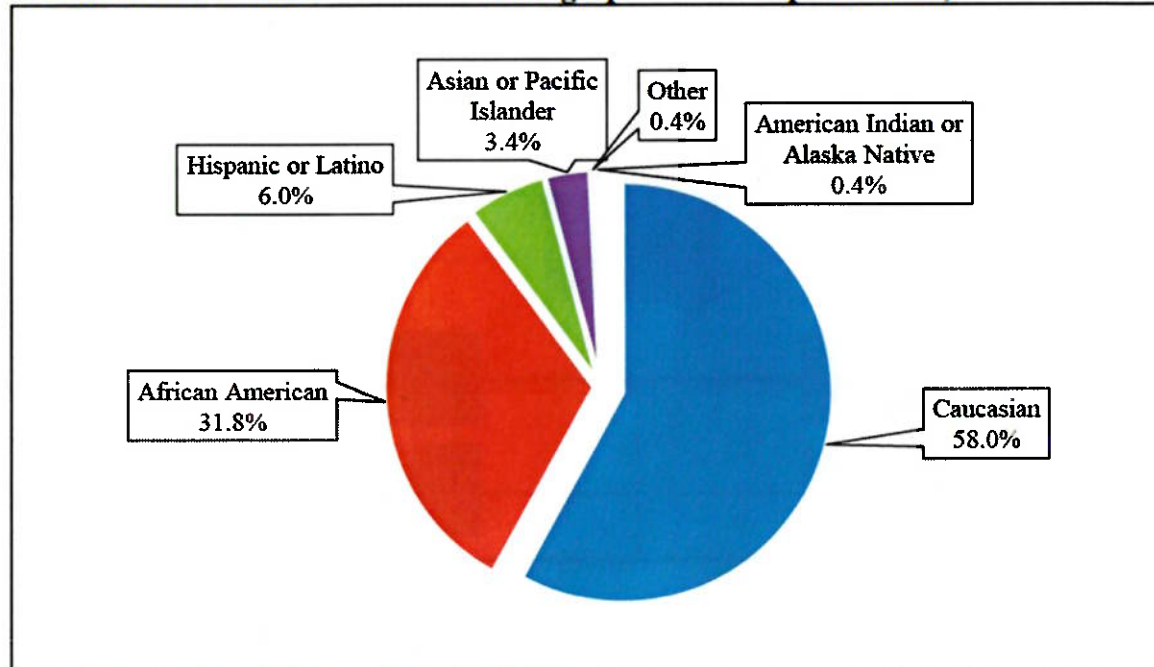


Source: OIG generated from USCP organizational chart dated January 2018.

Diversity is particularly important in law enforcement. Police depend on the support and assistance of the public, yet members of racial and ethnic minorities tend to view police less favorably than their white counterparts. Because of the visibility of police officers in American communities and here in the Nation's Capital, a diverse agency publicly displays its commitment to equal treatment in law enforcement. Diversity in the ranks can also help make police personnel more sensitive to the use of racially or ethnically offensive language in casual as well as public conversations.

According to Office of Human Resources (OHR), USCP had a workforce of 2,166 (1,816 sworn officers and 350 civilians) as of September 30, 2017. Of the 2,166 employees, 483 were females (22.3 percent) and 909 were minorities (42 percent). See Exhibit 2 for USCP's total workforce demographics as of September 30, 2017.

**Exhibit 2: USCP Total Workforce Demographics as of September 30, 2017**



Source: OIG generated from OHR data as of September 30, 2017.

Tables 1 and 2 below provide USCP workforce demographic details by male and female for USCP's total workforce in fiscal year (FY) 2017.

**Table 1: FY 2017 USCP Workforce - Males**

Employees	Workforce	
	Number	Percent
<b>Males</b>		
Caucasian	1,032	61.3%
African American	476	28.3%
Hispanic or Latino	106	6.3%
Asian/Pacific Islander	61	3.6%
Native American	3	0.2%
Other	5	0.3%
<b>Total Males</b>	<b>1,683</b>	<b>100.0%</b>

Source: OIG generated from OHR data as of September 30, 2017.

**Table 2: FY 2017 USCP Workforce - Females**

Employees Females	Workforce	
	Number	Percent
Caucasian	225	46.6%
African American	212	43.9%
Hispanic or Latino	25	5.2%
Asian/Pacific Islander	13	2.7%
Native American	5	1.0%
Other	3	0.6%
<b>Total Females</b>	<b>483</b>	<b>100.0%</b>

Source: OIG generated from OHR data as of September 30, 2017.

The Equal Employment Opportunity Commission (EEOC) provides guidance to executive branch entities. The Congressional Accountability Act (CAA) provides legislative branch entities, including USCP, guidance related to employment and workplace safety laws. The Office of Compliance (OOC) implements the CAA, which protects both current employees and job applicants, and in certain instances, former employees and members of the public.

The OOC administers an Alternative/Administrative Dispute Resolution (ADR) program established by the CAA. See Appendix C for an illustration of the process.

USCP employees have several other avenues for addressing workplace issues related to diversity or equality. Employees can file a complaint with OPR as illustrated in Appendix D. Employees can file a grievance under the Collective Bargaining Agreements (CBA). Alternatively, employees can also seek resolution through the OOC.

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

Our objectives were to (1) determine if the Department properly designed a diversity program that would yield desired results, (2) evaluate the accuracy and completeness of complaints and discrimination data reported to stakeholders, and (3) assess the status of recommendations made in the previous diversity audit. Our scope included program policies in effect as of January 2, 2018, and data collected during the 5 previous calendar years (CYs)—2012 through 2017.

To accomplish our objectives, we interviewed USCP officials to gain a basic understanding of the Department's diversity program, initiatives, and goals for the future.

To gain a better understanding of the Department's diversity environment, we reviewed the following guidance and industry best practices:

- USCP Directive [REDACTED], January 26, 2017
- USCP Directive [REDACTED], December 16, 2016
- Public Law 104-1, *Congressional Accountability Act of 1995*, as amended, November 16, 2016
- *Equal Employment Opportunity* Management Directive for 29 C.F.R. [Code of Federal Regulations] Part 1614 (EEO MD-110), as revised, August 5, 2015
- USCP Directive [REDACTED] November 19, 2012
- USCP Directive [REDACTED] May 28, 2012
- USCP Directive [REDACTED], May 28, 2012
- USCP Directive [REDACTED], May 28, 2012
- USCP Standard Operating Procedure (SOP) [REDACTED] May 24, 2011
- *Diversity Management: Expert-Identified Leading Practices and Agency Examples* (GAO-05-90), January 2005
- *Equal Employment Opportunity* Management Directive 715 (EEO MD-715), October 1, 2003
- USCP SOP [REDACTED], August 3, 2001
- USCP Directive [REDACTED] various dates

To determine if the Department properly designed its diversity program and achieved desired results, we assessed whether the Department achieved a workforce reflective of a diverse labor market by analyzing the Department's workforce using demographic data. We requested demographic data from the Department and compared those numbers with demographic data obtained from the U.S. Census Bureau for national statistics and [REDACTED] for law enforcement related statistics. Furthermore, we requested that IDEA complete the EEO MD-715 Self-Assessment Checklist to determine whether a process was in place that would allow USCP to measure its workforce diversity and diversity initiatives. Additionally, we interviewed several Department officials to solicit their perspective of the Department's diversity program.

In order to evaluate the accuracy and completeness of complaints and discrimination data, OIG reviewed data related to USCP complaints and discrimination data for FY 2017. As OOC is independent of USCP, we relied on the accuracy and completeness of its compliance and discrimination data. For USCP data, we reviewed OPR's annual statistical report prepared in accordance with the Commission on Accreditation for Law Enforcement Agencies (CALEA) Accreditation Standard 52.1.5. Pursuant to CALEA standards, USCP must compile annual statistical summaries based on records of internal affairs investigations and make those statistics available to the public and agency employees.

To assess the status of recommendations made in the prior audit Report Number OIG-2008-05, we reviewed the corrective actions implemented in 2010 that resulted in the

closing of the associated recommendations. We also reviewed evidence to confirm that the corrective actions were functioning as intended.

As a legislative branch agency, the Department is not subject to EEOC and Government Accountability Office (GAO) guidance. However, we used EEO MD-110, EEO MD-715, and GAO's *Diversity Management: Expert-Identified Leading Practices and Agency Examples* (GAO-05-90), dated January 2005, as best practices.

We conducted this assessment in Washington, D.C., from January through May 2018. We did not conduct an audit, the objective of which would be the expression of an opinion on Department programs. Accordingly, we do not express such an opinion. OIG did not conduct this assessment in accordance with generally accepted government auditing standards. Had we conducted an audit and followed such standards, other matters might have come to our attention. On May 31, 2018, we provided a draft copy of this report to Department officials for comment. On June 7, 2018, we conducted an exit conference with Department officials. See Appendix A for a list of OIG recommendations. We incorporated Department comments as applicable and attached the response to the report in its entirety as Appendix B.

## RESULTS

The Department did not design a diversity program that yielded desired results. The Department also did not have policies or procedures for collecting Department data related to diversity or equality issues. In addition, the Department did not maintain corrective actions previously implemented to close the recommendations related to the diversity audit of 2008.

### Department Diversity Program

While it has taken steps to embrace diversity, the Department did not have policies, procedures, or a strategic plan that could guide USCP offices in diversity issues. Specifically, IDEA did not have an approved strategic plan. Although the new Diversity Officer initiated several proactive activities to cultivate diversity, there were no requirements for measuring and reporting Department performance. Without policies and a strategic plan that identify program objectives aligning with goals and performance measurement procedures, the Department cannot be certain that goals for achieving and maintaining diversity are accomplished.

Overall, the demographics and data on gender portray the Department in a positive light. In addition to reviewing USCP demographic data, we also compared USCP diversity initiatives with leading diversity management practices the EEOC and GAO support.



## Overall Demographics Analysis

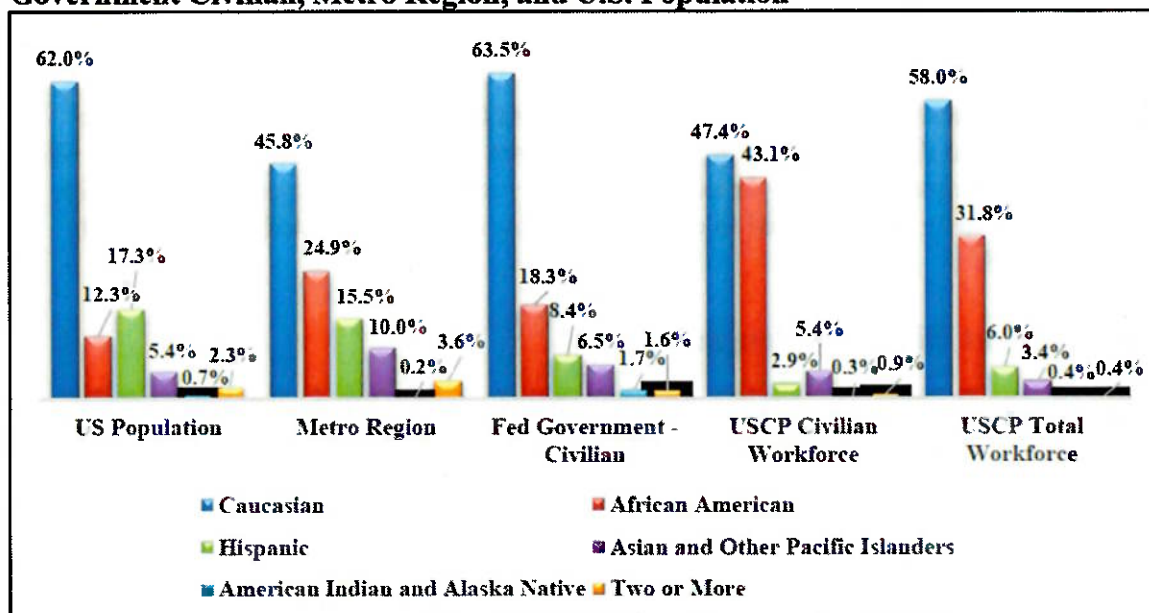
To assess whether the Department properly designed a diversity program that would yield the desired results, OIG collected and compiled demographics data using the most recently available data from the following sources:

- U.S. population as of July 2016 (U.S. Census Bureau<sup>3</sup>)
- Metro-regional population as of July 2016 (Census Reporter<sup>4</sup>)
- Federal Government workforce population as of September 2017 (U.S. Office of Personnel Management [OPM]<sup>5</sup>)
- Federal Government agency populations for 2016 (Partnership For Public Service<sup>6</sup>)

We then analyzed the composition of the USCP workforce data as of September 30, 2017 by making comparisons to these other demographics data.

Exhibit 3 below shows the composition of each distinct population set.

**Exhibit 3: Comparison of USCP Total Workforce, USCP Civilian, Federal Government Civilian, Metro Region, and U.S. Population**



Source: OIG generated using data obtained from the Department, U.S. Census Bureau, and OPM.

<sup>3</sup>2016, *ACS Demographic and Housing Estimates*, 2012-2016 American Community Survey 5-Year Estimates; <https://factfinder.census.gov>.

<sup>4</sup>Washington-Arlington-Alexandria, DC-VA-MD-WV Metro Area, Race and Ethnicity, Demographics, ACS 2016 1-year unless noted; <https://censusreporter.org>.

<sup>5</sup>OPM's FedScope Data Cubes, September 2017; <https://www.opm.gov/policy-data-oversight/data-analysis-documentation/fedscope>.

<sup>6</sup>2016, *Workforce Size and Demographics*, <http://bestplacestowork.org>.

The results of the analysis were:

- Caucasians represented 62.0 percent, 45.8 percent, 63.5 percent, 47.4 percent, and 58.0 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.
- African Americans represented 12.3 percent, 24.9 percent, 18.3 percent, 43.1 percent, and 31.8 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.
- Hispanics represented 17.3 percent, 15.5 percent, 8.4 percent, 2.9 percent, and 6.0 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.
- Asians and other Pacific Islanders represented 5.4 percent, 10.0 percent, 6.5 percent, 5.4 percent, and 3.4 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.
- American Indian and Alaska Natives represented 0.7 percent, 0.2 percent, 1.7 percent, 0.3 percent, and 0.4 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.
- Two or more races represented 2.3 percent, 3.6 percent, 1.6 percent, 0.9 percent, and 0.4 percent of the U.S. population, metro regional population, Federal Government (civilian) population, USCP civilian workforce, and USCP total workforce, respectively.

Representation of African Americans in USCP civilian and total workforce exceeded that of other populations while representation of Hispanics and Asians was lower than the compared populations.

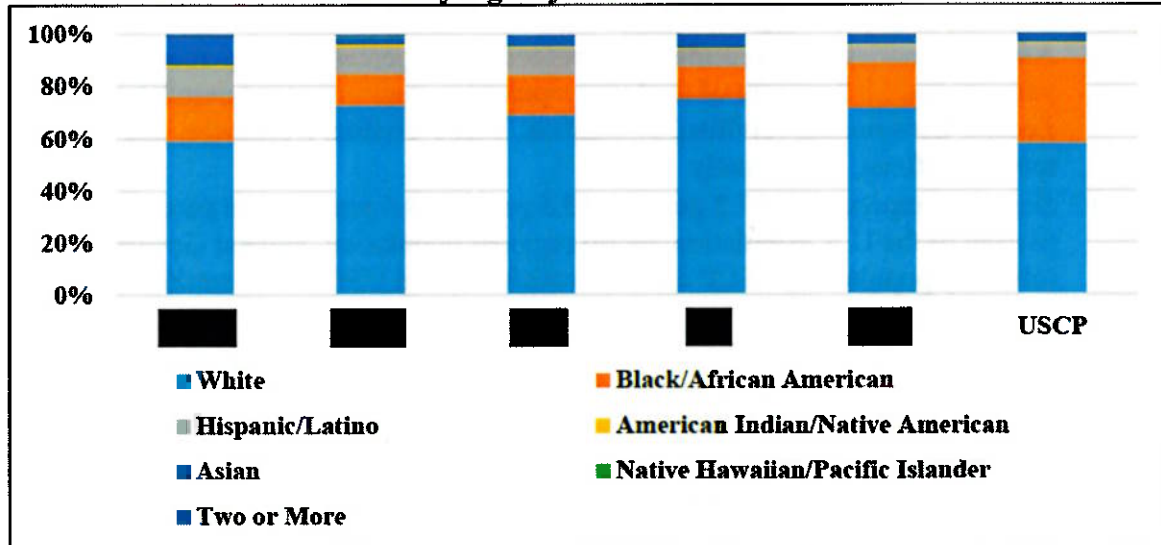
Further, using the additional demographics data that the Diversity Officer provided in April 2018, we compared the racial distribution for the following Federal Government agencies:



As shown in Exhibit 4, minority representation at USCP is much more favorable compared to that of other Federal agencies. As of June 2016, minorities accounted for 42 percent of the total USCP workforce, while minorities accounted for 41 percent, 27

percent, 31 percent, 25 percent, and 29 percent at [REDACTED], respectively. As previously noted, representation of African Americans in USCP total workforce exceeded that of other Federal agencies.

**Exhibit 4: Racial Distribution by Agency as of June 2016**



Source: OIG generated from data provided by IDEA and obtained from [www.bestplacetowork.org](http://www.bestplacetowork.org).

#### **Distribution of USCP Sworn Workforce by FY: FY 2015-FY 2017**

In addition, racial distribution of USCP sworn workforce has remained consistent over the last three years as shown in Table 3.

**Table 3: Distribution of Sworn Workforce – FY 2015 through FY 2017**

Race	FY 2017	FY 2016	FY 2015
Caucasian	60.1%	59.9%	59.6%
African American	29.6%	30.3%	30.9%
Hispanic or Latino	6.7%	6.4%	6.0%
Asian or Pacific Islander	3.0%	2.7%	2.7%
Two or More	0.4%	0.4%	0.4%
American Indian or Alaska Native	0.3%	0.3%	0.4%

Source: OIG generated from OHR data as of September 30, 2017.

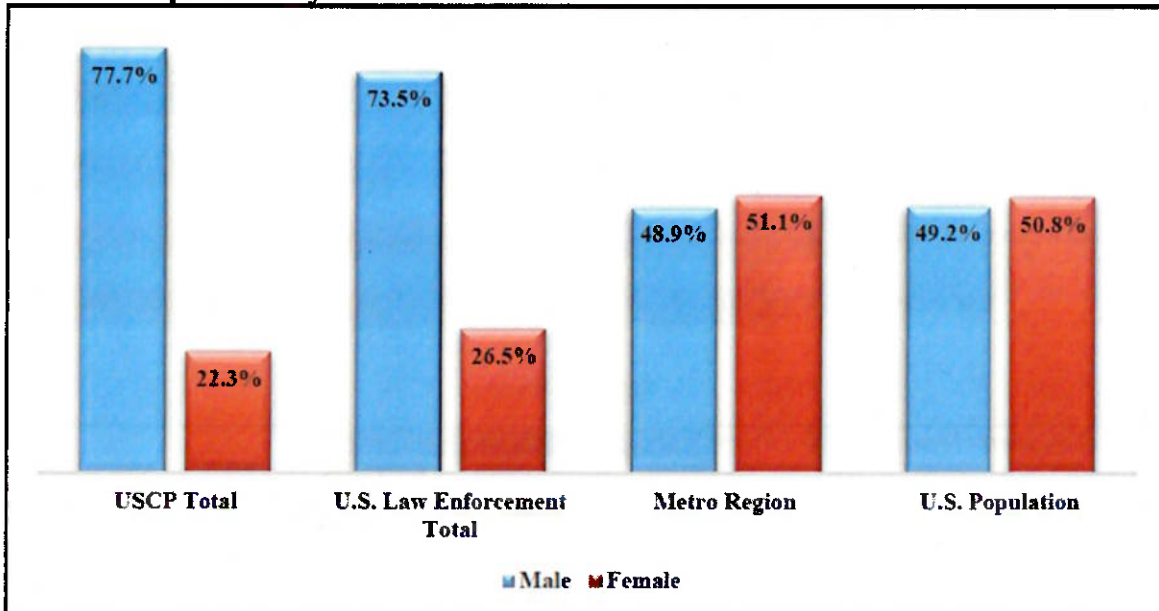
#### **Distribution of USCP Workforce by Gender**

According to U.S. Census Bureau data, females account for 50.8 percent of the U.S. population, while females account for 51.1 percent of the metro region population. Males have typically outnumbered females in law enforcement agencies. According to Uniform Crime Reporting Program data, female representation in law enforcement total workforce (including both sworn and civilian) is 26.5 percent while that of USCP is 22.3 percent.



See Exhibit 5 for the illustration of female representation in USCP, nationwide law enforcement, and U.S. population sets.

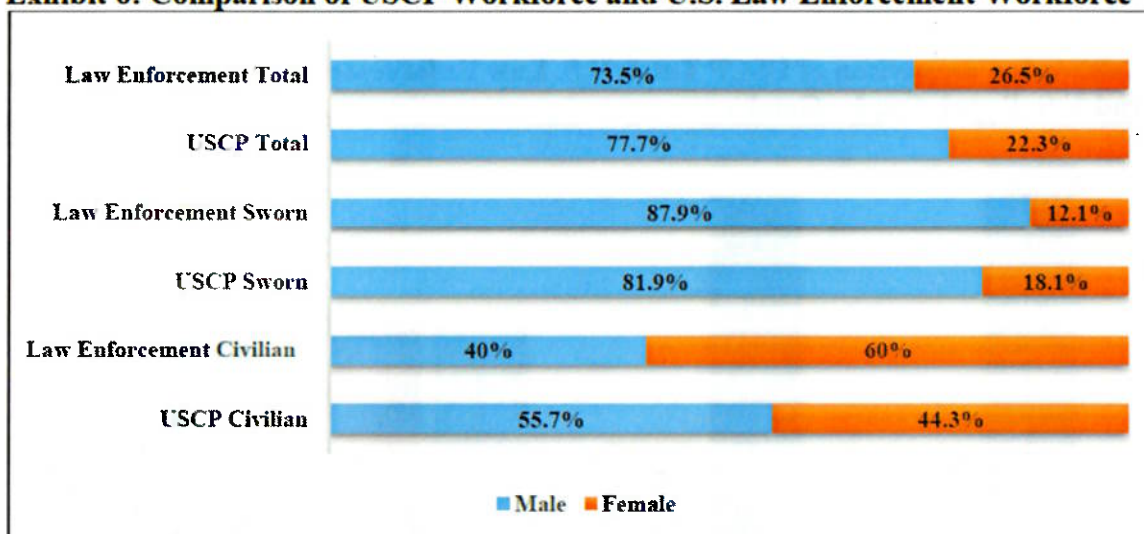
**Exhibit 5: Comparison of USCP Total, U.S. Law Enforcement Total, Metro Region, and U.S. Population by Gender**



Source: OIG generated using data obtained from the Department, Uniform Crime Reporting Program, and the U.S. Census Bureau.

We looked closer into the composition of sworn versus civilian law enforcement workforce to draw a comparison between the two populations at a more detailed level. Nationally, females represent 12.1 percent of the sworn side of law enforcement whereas USCP sworn workforce is 18.1 percent female. USCP female representation in the sworn workforce is ahead on that statistic compared to U.S. nationwide law enforcement workforce. On the civilian side of law enforcement, females comprise 60 percent of law enforcement workforce compared to USCP civilian workforce where it is 44.3 percent, as seen in Exhibit 6.

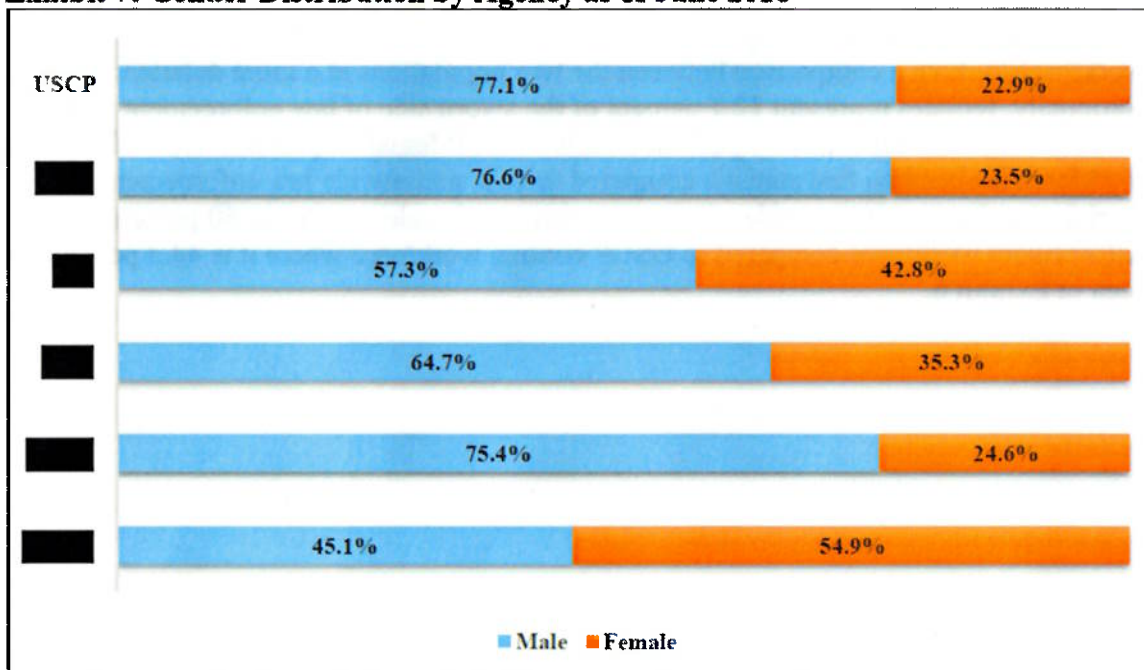
### Exhibit 6: Comparison of USCP Workforce and U.S. Law Enforcement Workforce



Source: OIG generated using data obtained from the [REDACTED]

Exhibit 7 shows the gender distribution at some of the [REDACTED]. Based on that data, female representation in the total USCP workforce (22.9 percent) is the lowest among other Federal agencies reviewed.

### Exhibit 7: Gender Distribution by Agency as of June 2016

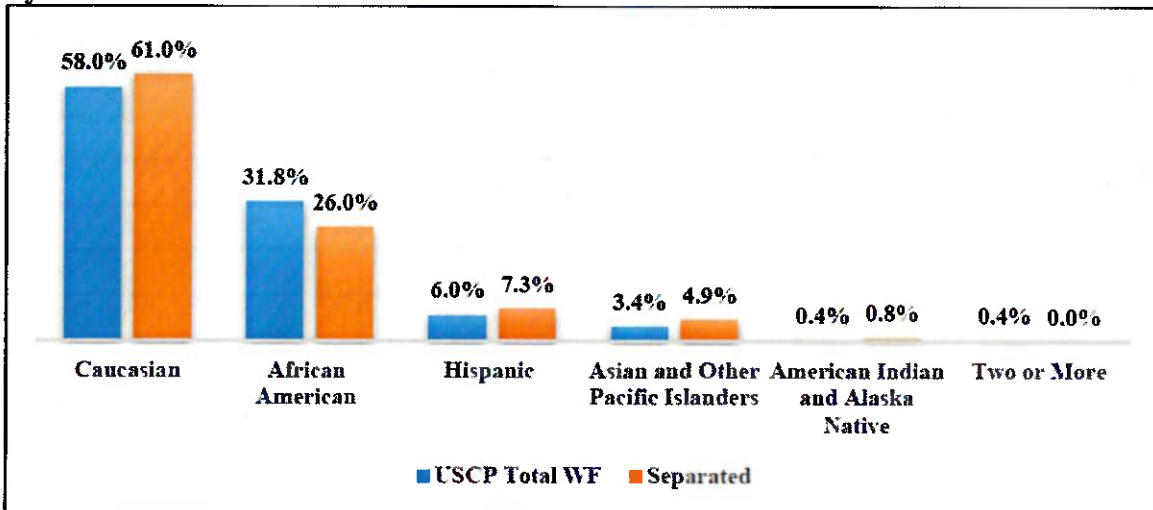


Source: OIG generated from data provided by IDEA and obtained from [www.bestplacetowork.org](http://www.bestplacetowork.org).

## Demographics of USCP Workforce Separating During FY 2017

We reviewed the demographics of separated Department employees to evaluate trends. We compared the total USCP workforce demographics to employees who separated from USCP during FY 2017 to determine the distribution of separations within the Department's total workforce as the number relates to the composition of USCP total workforce, as illustrated in Exhibit 8. While about 42 percent of the workforce was minority, the separation pool was only 39 percent minority, which means that USCP is retaining more minority employees on average.

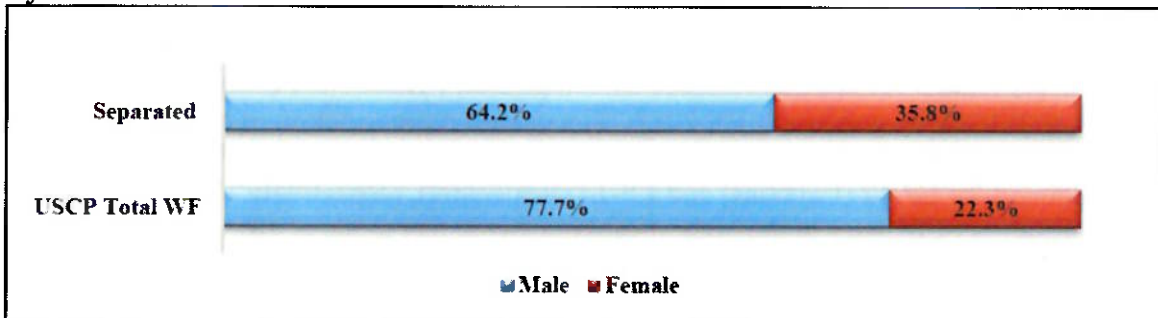
**Exhibit 8: Comparison of USCP Total Workforce and Separated USCP Employees by Race**



Source: OIG generated from OHR data as of September 30, 2017.

As previously mentioned, females make up 22.3 percent of the USCP total workforce, yet 35.8 percent of females separated from the Department on a percentage basis as shown in Exhibit 9. While this assessment did not evaluate separation details, such data would contribute to an effective diversity program.

**Exhibit 9: Comparison of USCP Total Workforce and Separated USCP Employees by Gender**



Source: OIG generated from OHR data as of September 30, 2017.

## An Overview of USCP's Workforce by Pay Grade for FY 2017

We obtained an overview of USCP's total workforce for civilian and sworn status by their respective pay grades and gender for FY 2017.

Table 4 provides a breakdown of USCP civilian pay (CP) grades and compares USCP total civilian workforce by gender for FY 2017. The overall representation of civilian females is 44.3 percent. Representation of females in the higher-ranking CP grades is 50 percent, 28 percent, and 30.8 percent for CP-12, CP-13, and CP-14, respectively.

**Table 4: Comparison of USCP's Total Civilian Workforce and Gender by Pay Grade for FY 2017**

CP Grade	Total Number	Number		Percent	
		Male	Female	Male	Female
CP-1	0				
CP-2	0				
CP-3	19	11	8	57.9%	42.1%
CP-4	19	5	14	26.3%	73.7%
CP-5	24	11	13	45.8%	54.2%
CP-6	14	6	8	42.9%	57.1%
CP-7	28	16	12	57.1%	42.9%
CP-8	50	30	20	60.0%	40.0%
CP-9	48	35	13	72.9%	27.1%
CP-10	45	22	23	48.9%	51.1%
CP-11	45	22	23	48.9%	51.1%
CP-12	20	10	10	50.0%	50.0%
CP-13	25	18	7	72.0%	28.0%
CP-14	13	9	4	69.2%	30.8%
CP-15	0				
<b>Total</b>	<b>350</b>	<b>195</b>	<b>155</b>	<b>55.7%</b>	<b>44.3%</b>

Source: OIG generated using OHR data for FY 2017.

Table 5 provides a breakdown of USCP sworn pay (LP) grades and compares USCP total sworn workforce by gender for FY 2017. The overall representation of sworn females is 18.1 percent. Representation of females in higher-ranking LP grades is 23.5 percent and 22.2 percent for LP-12 (Captains) and LP-14 (Inspectors), respectively. USCP lacks representation of females in the highest-ranking sworn pay grade of LP-16 (Deputy Chief). However, prior to the issuance of this report, the COP announced the appointment of the first African American female Deputy Chief on May 29, 2018.



**Table 5: Comparison of USCP's Total Sworn Workforce and Gender by Pay Grade for FY 2017**

LP Grade and Position		Total Number	Number		Percent	
			Male	Female	Male	Female
LP-1	Private	126	99	27	78.6%	21.4%
LP-2	Private with Training	175	128	47	73.1%	26.9%
LP-3	Private First Class	1,237	1,042	195	84.2%	15.8%
LP-4	Technician	50	46	4	92.0%	8.0%
LP-6	Detective/Master Patrol Officer	1	1	0	100.0%	0.0%
LP-8	Sergeant	153	120	33	78.4%	21.6%
LP-10	Lieutenant	45	29	16	64.4%	35.6%
LP-12	Captain	17	13	4	76.5%	23.5%
LP-14	Inspector	9	7	2	77.8%	22.2%
LP-16	Deputy Chief	3	3	0	100.0%	0.0%
<b>Total</b>		<b>1,816</b>	<b>1,488</b>	<b>328</b>	<b>81.9%</b>	<b>18.1%</b>

Source: OIG generated using OHR data for FY 2017.

### Diversity in Senior Level Positions

GAO-05-90 identifies succession planning as an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization's potential future.

USCP has made progress in improving diversity in senior-level positions. Overall, the number of senior-level positions increased from 17 to 18 from FY 2012 through FY 2017. Within that total, representation of females increased from about 18 percent to about 33 percent and representation of minorities increased from about 18 percent to about 22 percent between FY 2012 through FY 2017, as shown in Table 6. During FY 2017, minorities represented 22.2 percent of USCP senior-level positions, which was greater than the 20.7 percent of senior executive service (SES) positions throughout the Federal Government during FY 2014. However, representation of females in the Department's senior-level positions was 33.3 percent, which was slightly less than the 33.9 percent of career SES positions in the Federal Government, as shown in Table 6.

**Table 6: Comparison of Minorities and Females in Senior-Level Positions between USCP (FY 2012 and FY 2017) and Governmentwide (FY 2014)**

Senior-Level Positions	FY 2012 USCP	FY 2017 USCP	FY 2014 SES Governmentwide
Minorities	17.7%	22.2%	20.7%
Females	17.7%	33.3%	33.9%

Source: OIG generated using data provided by OHR for FY 2012 senior level positions and FY 2017 USCP demographics, and data obtained from OPM Federal Equal Opportunity Recruitment Program (FEORP) Report for FY 2014.

Table 7 shows a gender comparison between USCP's total workforce and USCP's senior level positions. As of FY 2017, USCP's total workforce was 2,166 employees, which included 18 employees in senior-level positions. Females made up about 22 percent of USCP's total workforce and represented a higher percentage of about 33 percent in senior-level positions at USCP.

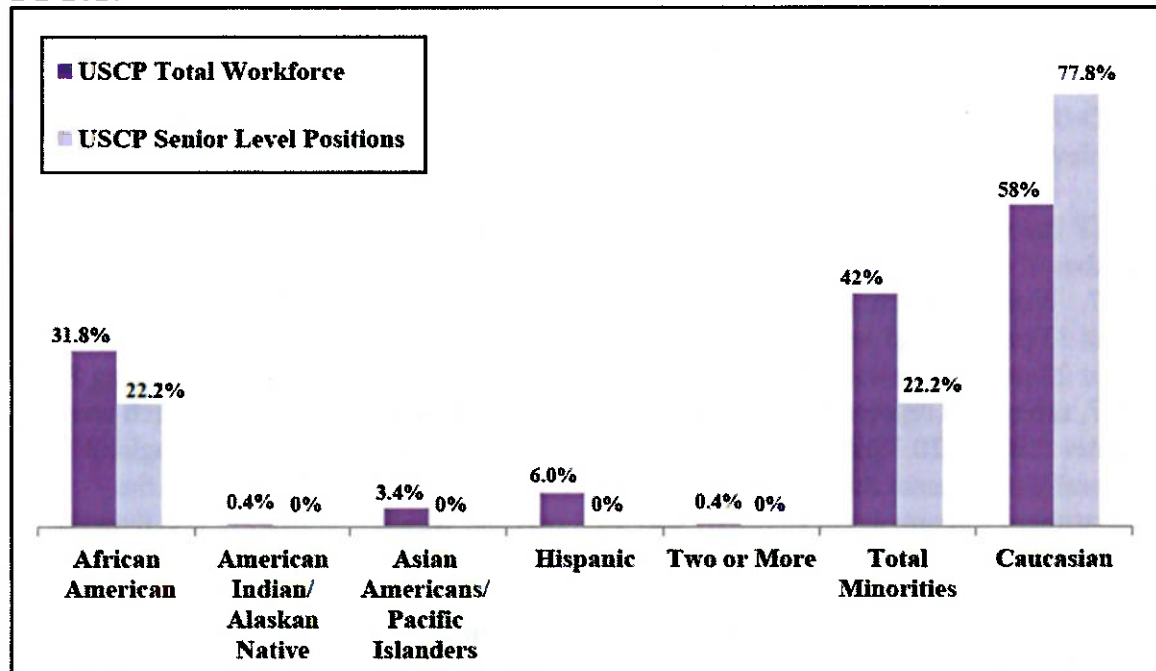
**Table 7: Gender Comparison of USCP Workforce and Senior Level for FY 2017**

USCP	Senior-Level Positions		Total Workforce	
	Number	Percent	Number	Percent
Male	12	66.7%	1,683	77.7%
Female	6	33.3%	483	22.3%

Source: OIG generated using OHR data as of September 30, 2017.

Exhibit 10 shows a comparison of USCP's total workforce demographics to minorities in senior-level positions for FY 2017. Minorities represented about 42 percent of USCP's total workforce and represented a lower percentage of about 22 percent in senior-level positions at USCP.

**Exhibit 10: Comparison of USCP Total Workforce and Senior-Level Percentages for FY 2017**



Source: OIG generated using OHR data as of September 30, 2017.

### Diversity in USCP Development Pools

Senior-level development pool data the Department provided for FY 2012 through FY 2017 indicates USCP progressed in achieving diversity in the development pool for sworn

senior-level positions. USCP did not have a formal process in place for development pool of senior-level positions for civilian employees. As a result, our assessment of diversity in development pools only considered sworn employees. USCP's senior-level positions are equivalent to SES positions at executive branch agencies. The USCP senior-level position of Deputy Chief is a sworn position, while senior-level positions for civilians include CP-14 (Deputy Chief Administrative Officer (CAO), Assistant Deputy CAO, Chief of Staff, Directors, General Counsel, and Employment Counsel) and CP-13 (Assistant Deputy CAO and Diversity Officer)<sup>7</sup>. Appendix E provides USCP Senior Level Development Program participation data. USCP senior-level development pool positions for sworn employees include Captain (LP-12) and Inspector (LP-14).

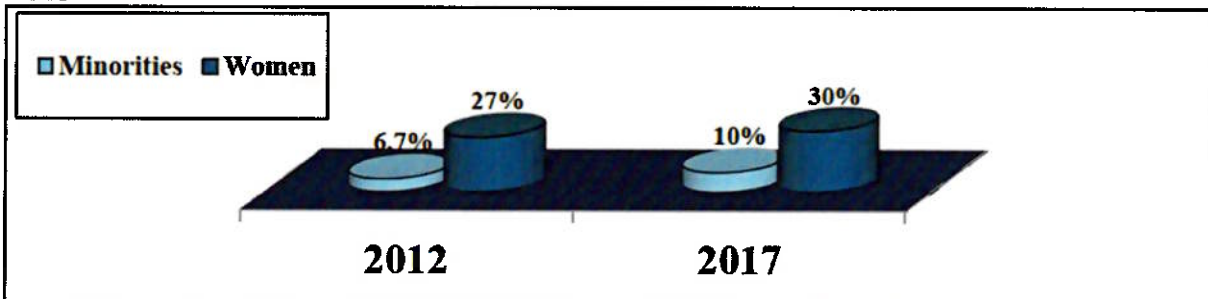
While the sworn senior-level development pool decreased from 15 candidates to 10 between FY 2012 and FY 2017, as shown in Table 8, representation of females and minorities increased. Within that total, representation of females increased from 26.7 percent to 30 percent, whereas the representation of minorities increased from about 6.7 percent to 10 percent between FY 2012 and FY 2017, as shown in Exhibit 11. According to an OHR official, the Deputy Chief development pool consists of current USCP Inspectors selected through the formal Inspector process.

**Table 8: Comparison of FY 2012 and FY 2017 Sworn Senior Level Development Pool**

USCP Development Pool (Captain/Inspector)	FY 2012 Development Pool			FY 2017 Development Pool		
	Total Development Pool Number	Number	Percent	Total Development Pool Number	Number	Percent
Minorities	15	1	6.7%	10	1	10%
Females		4	27%		3	30%

Source: OIG generated using data provide by OHR for FY 2012 and FY 2017 sworn senior level development pool.

**Exhibit 11: Comparison of FY 2012 and FY 2017 Sworn Senior Level Development Pool**



Source: OIG generated using OHR data for FY 2012 and FY 2017.

<sup>7</sup>According to OHR there are 15 civilian senior level positions as of May 2018.

## **Conclusion**

Minority representation in USCP civilian and total workforce compared favorably to both the nationwide population and the Federal Government population. Racial distribution of the USCP sworn workforce has remained consistent over the last 3 years. The USCP workforce has representation of females in civilian and sworn status, with higher percentages of females across the civilian pay grades. However, female representation was greater on the sworn side and less on the civilian side at USCP, when compared to those of nationwide law enforcement. On a percentage basis, USCP retained more minority and less females. The representation at USCP of minorities and females in senior-level positions has been increasing throughout the last 5 years and remains on par with the SES statistics throughout the Federal Government. Further, although USCP's sworn senior-level development pool has had increases in its representation of minorities and females, minorities continue to represent a lower rate in the sworn senior-level development pool. USCP also did not have a process in place for senior-level development pool of civilians.

Our analysis of USCP data compared to the demographics data at national, metro-regional, Governmentwide, and law enforcement level confirms that the Department could improve its workforce diversity by maintaining relevant data and conducting analyses so it can measure program results and accurately assess whether the diversity goals are being accomplished.

## **USCP Diversity Initiatives Compared to Diversity Management Best Practices Identified by the EEOC and GAO**

### **Incorporating the Essential Elements of EEO MD-715**

EEO MD-715 is the policy guidance, which EEOC provides to Federal agencies for their use in creating and maintaining effective programs of EEO. Since October 1, 2003, the directive has provided the essential elements necessary for establishing and maintaining a model EEO program in the Federal Government. The directive applies to all executive agencies and military departments, the U.S. Postal Service, the Postal Rate Commission, the Tennessee Valley Authority, the Smithsonian Institution, and those units of the judicial branch of the Federal Government having positions in the competitive service.

According to EEOC, EEO MD-715 not only contains reporting requirements, but also denotes that six essential elements comprise a model EEO program as follow:

- A. Demonstrated commitment from agency leadership
- B. Integration of EEO into the agency's strategic mission
- C. Management and program accountability
- D. Proactive prevention of unlawful discrimination



- E. Efficiency
- F. Responsiveness and legal compliance

Although not required, the Department has generally begun to follow several of the key elements of the EEOC's EEO MD-715 for establishing and maintaining an effective EEO program into the structure of the Department. For example, of the six essential elements outlined in EEO MD-715, USCP has generally incorporated the following: Element A: demonstrated commitment from agency leadership; Element D: proactive prevention of unlawful discrimination; element E: efficiency; and element F: responsiveness and legal compliance. Incorporating Elements B and C would help the Department establish a model EEO program.

As part of the assessment, OIG assessed the status of the Department's voluntary efforts to integrate the elements of EEO MD-715 into the structure of the Department. See Appendix F for the OIG evaluation of EEO MD-715 fulfillment.

#### **Element A – Demonstrated Commitment from Agency Leadership**

Element A recommends that the demonstrated commitment from agency leadership start with an effective EEO policy statement. This element requires the agency head issue a signed written policy statement expressing the agency's position against discrimination based on the areas that Federal law covers, at the beginning of a tenure and each year thereafter. Although USCP voluntarily adopted this element, the COP issued his first EEO policy statement to USCP employees on November 22, 2016, and during our fieldwork, the COP expressed a commitment to diversity management via an EEO policy statement on March 5, 2018.

#### **Element B – Integration of EEO into the Agency's Strategic Mission**

The premise of Element B is that the equality of opportunity is essential in an agency's achievement of its strategic mission. To this end, agencies should structure their EEO programs to maintain a workplace that is free from discrimination and support the agency's strategic mission. Although IDEA's *2017-2018 Annual Report and Strategic Goals* and OHR *USCP Strategic Recruitment Plan FY 2017-2019* outline diversity-driven goals, the overall *USCP Strategic Plan FY 2015-2019* does not incorporate development of diversity management.

#### **Element C – Management and Program Accountability**

Element C stipulates that the agency head hold managers, supervisors, and EEO officials responsible for the effective implementation of the agency's EEO program and plan. The core of management and program accountability is that the agency ensures effective coordination between its EEO programs and Human Resources program and that EEO officials advise and provide assistance to managers about the status of EEO programs within each manager's area of responsibility.

As of May 2018, the Department did not have a strategic plan that clearly defined and communicated the mission, objectives, responsibilities, and roles or the reporting structures for IDEA and other EEO related offices. Without clear definition of responsibilities, accountability cannot be achieved among the various offices involved in diversity management. Policies allow identification of program performance measures and the data, and data owners responsible for reporting the performance measures. According to multiple senior officials, no coordinated effort existed to achieve diversity goals.

#### **Element D – Proactive Prevention of Unlawful Discrimination**

Element D maintains that the agency should make an early effort to prevent discrimination and to identify and prevent barriers to EEO. Such efforts may come in the form of quantitative and qualitative data derived from interviews, complaint/grievance data, exit surveys, focus groups, union, program evaluations, and anti-harassment program.

To some extent, USCP has used employee surveys and focus groups to assess performance of key mission support functions. Furthermore, the OHR Human Capital Strategy, Recruitment, and Employment Division performs analyses of USCP diversity workforce composition using various sources of information such as graduating class demographics, new hire demographics, and separation demographics in limited scope. Additional measures for ensuring timely and consistent access to data will assist with proactive measures.

#### **Element E – Efficiency**

Element E states that the agency head must ensure that effective systems are in place for evaluating the impact and effectiveness of the agency's EEO programs as well as an efficient and fair dispute resolution process. USCP encourages the widespread use of a fair ADR program—such as its internal administrative grievance system—that facilitates the early, effective, and efficient informal resolution of disputes. Per its Directive [REDACTED] dated December 16, 2016, the Department ensures that supervisors at all appropriate levels will participate in the ADR process. Moreover, OPR identifies, monitors, and reports significant trends reflected in complaint process activity through its annual statistical report. This analysis of data relating to the nature and disposition of EEO complaints can provide useful insight and therefore increase the Department's efficiency in dispute resolution process. Additionally, USCP employees have several avenues for addressing workplace issues such as the negotiated grievance under the CBA and OOC that can further increase efficiency in dispute resolution process.

#### **Element F - Responsiveness and Legal Compliance**

Element F requires that Federal agencies are in full compliance with EEO statutes and EEOC regulations, policy guidance, and other written instructions. This element also

provides that agency personnel are accountable for timely compliance with EEOC orders. Although EEOC regulations and orders do not apply to USCP, the Department implements some aspects of EEO MD-715 as best practice. As one of the CAA covered agencies, USCP follows the OOC mediation process.

The Department's leadership demonstrates commitment to EEO through COP's annual policy statement. Although it does not conduct the EEO MD-715 self-assessment or barrier analysis on an annual basis as EEO MD-715 requires, USCP makes efforts to prevent discrimination through analyses of its workforce diversity composition to some extent. USCP has several other avenues for addressing workplace issues aside from OOC that increase efficiency in its complaint resolution process. However, the Department's strategic plan does not incorporate EEO, and a lack of management and program accountability exists because no formal policies and procedures are in place. We believe that the responsiveness and legal compliance element was not applicable to the Department because USCP is not subject to EEO MD-715. Although USCP is voluntarily complying with four of the essential elements identified by the EEOC, the opportunity exists to create and maintain a model EEO program at USCP by fully incorporating the six elements into policy and practice.

### **Incorporating GAO Leading Diversity Management Practices**

GAO report GAO-05-90 lists leading diversity management practices. The objectives of the GAO report were to identify (1) leading diversity management practices, and (2) examples of how Federal agencies implement the identified practices in the Federal Government. The report identified nine leading practices.

OIG assessed USCP's status of voluntary efforts to incorporate the GAO Leading Diversity Management Practices into workforce diversity management at USCP. Appendix G provides a summary of those results. The following section discusses the results of our assessment.

**(1) Top leadership commitment** – a vision of diversity demonstrated and communicated throughout an organization by top-level management.

In alignment with Element A of EEO MD-715, this GAO leading practice also discusses the importance of top leadership commitment. As mentioned, USCP issued the EEO policy statement on November 22, 2016. During the OIG fieldwork, the COP issued the annual diversity/EEO policy statement to employees via e-mail on March 5, 2018.

**(2) Diversity as part of an organization's strategic plan** – a diversity strategy and plan developed and aligned with the organization's strategic plan.

The Department could improve diversity management. The *USCP Strategic Plan FY 2015-2019* does not specifically incorporate development of diversity management. The current strategic plan has an implied message of diversity rather than direct approach on

diversity. While such an approach is not required, the GAO study identifies alignment of a diversity management strategic plan with the agency strategic plan as a best practice.

**(3) Diversity linked to performance** – the understanding that a more diverse and inclusive work environment can yield greater productivity and help improve individual and organizational performance.

The March 5, 2018, EEO policy statement the COP issued states, “It is only when we recognize the diverse backgrounds and experiences of every one of us and the unique contributions we each make to the Department, can we fully accomplish our strategic goals and everyone can achieve their personal best.”

**(4) Measurement** – a set of quantitative and qualitative measures of the impact of various aspects of an overall diversity program.

USCP could not produce data for measuring the performance of diversity programs. We requested workforce demographics data of all USCP employees by grade, race, sex, and sworn and civilian status. We initially did not receive data pertaining to grade and rank corresponding with requested demographics for USCP employees. Subsequent to completion of the engagement, the Department was able to produce the requested information.

**(5) Accountability** – the means to ensure that leaders are responsible for diversity by linking their performance assessment and compensation to the progress of diversity initiatives.

The OHR *USCP Strategic Recruitment Plan FY 2017-2019* incorporates *USCP Strategic Plan FY 2015-2019* strategic objective 3.4 to “[i]mprove management and planning to create a culture of accountability and continuous improvement.” Under the Leadership Accountability and Commitment element of the plan, the stated diversity goal is to ensure leadership accountability for hiring and retaining a diverse workforce.

**(6) Succession planning** – an ongoing, strategic process for identifying and developing a diverse pool of talent for an organization’s potential future leaders.

USCP did not have a succession plan for identifying and developing a diverse pool of talent for future leaders. The *OHR FY 2015-2018 Plan* states succession planning as a goal, with objectives to create succession and talent development plans, SOPs on succession planning for civilian personnel, and SOPs and Directives governing leadership and career development for sworn personnel. According to the OHR Executive Officer, as of March 2018, OHR did not have a succession planning plan, SOPs, and directives. Efforts to achieve those goals and related objectives on succession planning are incomplete. However, IDEA is researching and planning to launch a mentoring program designed to identify any barriers to a diverse succession pool.

**(7) Recruitment** – the process of attracting a supply of qualified, diverse applicants for employment.

The OHR *USCP Strategic Recruitment Plan FY 2017-2019* places a strong emphasis on the importance of diversity in law enforcement. Under the Recruitment and Hiring element of the plan, the stated goal is to provide strategic diversity recruitment and hiring initiatives for attracting and developing a skilled and diverse workforce to meet the needs of USCP. Appendix H provides USCP's recruitment activity during CY 2017. Under the Outreach and Partnership element of the plan, the stated goal is to provide strategic diversity outreach and partnership initiatives for hiring and developing a skilled and diverse workforce. Under the Retention element of the plan, the stated goal is to retain the recruited diverse workforce through support of professional growth, recognition, and career development. However, enhanced coordination between IDEA and OHR is needed.

**(8) Employee involvement** – the contribution of employees in driving diversity throughout an organization.

IDEA created opportunities for select USCP employees to attend various leadership training conferences that made up various workshop sessions on topics such as threat identification, law enforcement and security, intelligence led policing, detecting cognitive biases, leadership, diversity, inclusion/EEO, awareness of workplace diversity issues, and more. The Department applied the information learned at those training conferences in efforts to meet its strategic goals. In addition, USCP launched the Diversity Council in 2017 to address three main concerns that employees raised in focus groups: lack of mentoring, employee engagement, and professional development.

**(9) Diversity training** – organizational efforts to inform and educate management and staff about diversity.

IDEA's *2017-2018 Annual Report and Strategic Goals* includes executing Unconscious Bias Training in spring of 2018.

## **Conclusions**

Although GAO and EEOC guidance does not apply to USCP, lacking other guidance, OIG believes it provides useful criteria for evaluating whether USCP is establishing and maintaining an effective EEO and diversity management program. Based on our assessment of the Department's voluntary compliance with several essential elements and leading practices identified by EEOC and GAO respectively, we identified areas for improvement. We noted that the Department has not established formal processes relating to diversity management through the issuance of corresponding policies and procedures. The lack of a formal strategic plan for IDEA creates ambiguity when defining Department goals and a lack of accountability among the various offices and bureaus involved in

diversity management that may further impede implementation of an effective diversity program (EEO MD-715 Elements B and C). Moreover, the absence of policies and procedures on maintaining demographic data for USCP employees and performing periodic self-evaluations of its diversity management efforts leads to the inability to measure performance of diversity management by IDEA and other offices involved in achieving diversity related goals (GAO practice 3 and 4). Further, the incomplete status for creating and implementing a succession plan and issuing related policies and procedures per the *OHR FY 2015-2018 Plan* creates inefficiencies in its diversity management efforts, including increased costs of replacing leadership positions with outside candidates rather than identifying and developing diligent supervisors and managers within the current workforce (GAO practice 6). In addition, *USCP Strategic Plan FY 2015-2019* did not directly incorporate development of diversity management (GAO practice 2).

### **Overall Assessment of Department Diversity Program**

Our analysis of the racial distribution of total workforce in comparison with the external demographics data showed that USCP has a higher representation of minority overall. Female representation in the USCP workforce was also favorable—very close to that of the U.S. population at a national level. However, the higher representation of females in the Department’s separated employees also means that USCP lost more females than they retained in FY 2017, on a percentage basis. On the other hand, representation of females and minorities in senior-level positions has increased over the last 5 years. Representation of both females and minorities have remained relatively consistent in USCP’s sworn development pool. While it demonstrated a commitment to diversity, USCP can make improvements to be on target with best practices. Our assessment of USCP’s voluntary efforts to comply with best practices revealed that the lack of formal policies and procedures and absence of maintaining data leads to lack of accountability and inability to measure performance of diversity initiatives at USCP, respectively. Furthermore, the absence of succession planning and incorporation of diversity management development into *USCP Strategic Plan FY 2015-2019* creates inefficiencies in its diversity management efforts. The opportunity for improvements exists to increase the effectiveness of the diversity program at USCP. OIG, therefore, makes the following recommendations.

**Recommendation 1:** We recommend that the United States Capitol Police develop a strategic plan that identifies the Office of Inclusion, Diversity, Equity, and Action roles and responsibilities and clearly defines each coordinating office/bureau’s (Office of Human Resources, Office of Professional Responsibility, and Employment Law Division) responsibilities and reporting requirements with regard to diversity matters.

**Recommendation 2:** We recommend that the United States Capitol Police design and perform an effective self-evaluation of its diversity management program on a periodic basis. The self-evaluation would include defining tracking methods for obtaining quantitative data on workforce demographics of the United States Capitol

**Police employees. In addition, the United States Capitol Police should identify segments within its workforce for which to collect qualitative data and accordingly improve qualitative data gathering methods.**

**Recommendation 3: We recommend that the United States Capitol Police update the current agency strategic plan and explicitly include diversity to ensure continuity and progression in the development of diversity management initiatives through integration of diversity management into its strategic plan.**

**Recommendation 4: We recommend that the United States Capitol Police strengthen its succession planning efforts by drafting a plan for succession planning and incorporating it into the Office of Inclusion, Diversity, Equity, and Action and Office of Human Resources diversity management efforts. Accordingly, the United States Capitol Police should create policies and procedures on succession planning, and leadership and career development for civilian and sworn employees as stated in the *Office of Human Resources FY 2015-2018 Plan*.**

## **Complaint/Discrimination Data**

USCP employees have several avenues when filing an employment discrimination complaint: OOC, unions,<sup>8</sup> and/or the Department through OPR. Each of the three processes is separate from each other, and the organizations do not typically share the information in the normal course of business. At any one point in time, it is difficult to determine the volume and nature of complaints.

## **Reporting by the OOC**

Section 301(h) of the CAA requires that OOC “. . . compile and publish statistics on the use of the Office by covered employees, including the number and type of contacts made with the Office, on the reason for such contacts, on the number of covered employees who initiated proceedings with the Office under this chapter and the result of such proceedings, and on the number of covered employees who filed a complaint, the basis for the complaint, and the action taken on the complaint.” The following congressional workplaces covered by the CAA<sup>9</sup> are: (1) the Congressional Budget Office, (2) GAO, (3) the House of Representatives (House), (4) the Library of Congress (LOC), (5) the Architect of the Capitol (AOC), (6) OOC, (7) the Office of Congressional Accessibility Services, (8) the Senate, (9) USCP, and (10) the Office of Attending Physician (OAP). As part of this assessment, OIG reviewed the OOC annual reports, *State of the Congressional Workplace*, for FY 2012 through FY 2016. The report includes statistical

---

<sup>8</sup>International Brotherhood of Teamster Local Union No. 639 and Fraternal Order of Police, District of Columbia Lodge No. 1, U.S. Capitol Police Labor Committee.

<sup>9</sup> Certain provisions of the CAA do not apply to GAO and LOC; however, employees of those agencies may have similar legal rights under different statutory provisions and procedures.



data on the ADR program. One of the data attributes is the number of *Requests for Counseling Filed Against all Employing Offices*. According to OOC annual reports reviewed, USCP's share of requests for counseling have been between 26 percent to 43 percent each year as shown in Table 9. In FY 2016, USCP made up 37 percent of the total 49 requests for counseling filed. Of the 49 requests for counseling filed, 19 were from AOC, 18 from USCP, 6 from House, 3 from OOC, 2 from Senate, and 1 from OAP.

**Table 9: USCP Representation within Requests for Counseling Filed Against All Employing Offices – FY 2012 through FY 2016**

	FY 2012	FY 2013	FY 2014	FY 2015	FY 2016
Total Requests for Counseling	83	81	57	63	49
USCP Requests for Counseling	36	21	15	20	18
Percentage	43%	26%	26%	32%	37%

Source: OIG generated using OOC annual report on State of the Congressional Workplace from FY 2012 to FY 2016.

## Reporting by USCP

OPR oversees administrative investigations relating to the conduct of Department personnel and inspections of its organizational components. OPR records and investigates allegations of misconduct by USCP employees generated from within the Department or outside sources. USCP Directive [REDACTED] states that complaints pertaining to Department policies or procedures or that allege misconduct by an employee of the Department must be documented, registered, investigated, and/or reviewed by the OPR, division, or OIG. The Directive further states that OPR must also investigate a complaint or allegation related to sexual or racial discrimination, harassment, or breach of civil rights—unless COP redirects.

The previous diversity audit identified EEO training for OPR investigators as an area for improvement. The Department's responding corrective action included EEO training for OPR investigators. OIG closed the recommendation. This assessment confirmed that as of February 2018 six investigators assigned to OPR have not received EEO training. Table 10 presents OPR's investigator-assigned dates and completion status of EEO training from FY 2012 through January 2018, which shows a lack of EEO training for several OPR investigators, including those currently assigned to OPR. A Department official stated that as new investigators transitioned into OPR in FY 2016 and FY 2017, EEO training did not take place because FY 2017 was an exceptionally busy year with more cases than average. EEO MD-110 states that minimum training requirements for new EEO investigators consist of at least 32 hours of investigator training before conducting investigations. In addition to the training requirement for new investigators, investigators are required to receive at least 8 hours of continuing investigator training every fiscal year.



**Table 10: OPR Investigators Assignment Schedule and EEO Training Status – (FY 2012 through January 2018)**

Investigators Assigned to OPR	Time In	Time Out	EEO Training Completed
1	11/02/2008	08/06/2016	05/10/2010
2	03/30/2008	12/12/2015	09/26/2008
3	04/19/2009	01/16/2016	06/21/2010
4	11/06/2011	09/03/2016	None
5	08/07/2016	03/04/2017	None
6	11/06/2011	04/26/2014	None
7	03/30/2008	12/12/2015	None
8	03/30/2008	02/11/2012	09/26/2008
9	12/13/2015	presently* active	None
10	01/17/2016	presently active	None
11	08/07/2016	presently active	None
12	11/06/2016	presently active	None
13	03/2017	presently active	None
14	02/05/2017	presently active	None

Source: OIG generated using USCP data for FY 2012 through January 2018.

\*As of May 2018.

While the Department is not required to report EEO statistics under the CAA, each year OPR prepares an annual statistical report in accordance with CALEA Accreditation Standard 52.1.5. This CALEA standard requires that the agency compile annual statistical summaries, based upon records of internal affairs investigations, and that the Department make the statistics available to the public and agency employees. As of March 2018, OPR had not published the CY 2017 annual statistical report. However, OPR provided 246 as the total number of complaints and discrimination data for 2017. Of the 246 total cases in 2017, OPR identified 19 cases related to harassment and discrimination. OPR did not sustain 9 of those allegations and dismissed the other 10 allegations. We noted a significant increase in the total number of allegations and total number of anti-harassment/anti-discrimination allegations from CY 2016 to CY 2017, from 194 to 246 and from 4 to 19, respectively. Upon our follow-up inquiry, 14 of the 19 anti-harassment/anti-discrimination allegations were discrimination-related allegations. One complainant filed five of the allegations. Nonetheless, based on our review the total number of sustained allegations related to harassment and discrimination has been consistently low from FY 2012 through CY 2017 as shown in Table 11.

**Table 11: Discrimination-related Allegations and Final Disposition – FY 2012 through CY 2017**

Reporting Period	Total Number of Allegations	Anti-Harassment/ Anti-Discrimination Related Total	Sustained	Not Sustained	Pending	Unfounded	Dismissed
CY 2017	246	19	0	9	0	0	10
CY 2016	196	4	1	1	0	2	0
CY 2015	189	9	2	2	0	5	0
2014 (15 month period)*	198	7	0	0	0	6	1
FY 2013	164	4	0	4	0	0	0
FY 2012	189	8	0	8	2	0	0

Source: OIG generated from OPR data as of December 31, 2017.

\*The reporting period for 2014 annual report (October 1, 2013 – December 31, 2014) reflects the change in the OPR investigation reporting procedure from a FY to a CY.

Under the terms of USCP's CBA with both the Fraternal Order of Police (sworn) and the International Brotherhood of Teamsters (civilians), an individual may elect to file either an EEO complaint with the OOC or with USCP. The CBA requires that USCP have a grievance process, and employees are encouraged to utilize the **internal administrative grievance system** before making a claim to the OOC. USCP Directive [REDACTED] dated May 28, 2012, allows non-bargaining **unit civilian** and sworn **employees** as well as officials to resolve any grievances with management. The CBA with the Fraternal Order of Police, Article 32, provides bargaining unit members a process for resolving grievances. The Office of the Chief of Police (OCOP) grievance logs for CY 2012 through January 2018 did not reveal any grievances related to EEO discrimination.

## Conclusions

The CAA allows Department employees to elect to report complaints to the United States Congress, OOC. During FY 2016, 18 employees requested counseling through the OOC process. However, because of the confidential nature of the ADR process, we were unable to obtain details regarding the 18 requests. OCOP grievance logs from CY 2012 through January 2018 did not include discrimination or race issues. However, OPR complaints and discrimination data for CY 2017 did include 19 discrimination/harassment allegations. While OPR collects and reports on complaints and discrimination issues, Department employees do not report all complaints to OPR. Without a mechanism for consistently collecting data related to diversity issues the Department cannot accurately measure discrimination data. Of note, numerous OPR investigators did not receive EEO training. Personnel with responsibility for handling EEO complaints without appropriate knowledge of Federal EEO laws, regulations and requirements, and required skills increases the risk of inefficiencies in **processing complaints**, which can lead to barriers

that result in ineffective resolutions of complaints. OIG, therefore, makes the following recommendation.

**Recommendation 5:** We recommend that the United States Capitol Police determine whether training in equal employment opportunity should be required for Office of Professional Responsibility investigators. The determination should address immediate training upon joining the Office of Professional Responsibility and subsequent refresher training to ensure that all Office of Professional Responsibility staff handling any aspect of equal employment opportunity complaints obtains the necessary knowledge pertaining to relevant information, and best practices to ensure efficient and effective processing of those complaints.

## **Status of Previous Recommendations**

During this assessment of workforce diversity one of our objectives was to assess the status of the four recommendations from the July 2008 *Audit of United States Capitol Police Workforce Diversity*, Report Number OIG-2008-05. During this assessment, OIG identified lapses in corrective actions that impaired the closed status of two previous recommendations.

In the previous audit, OIG found that the Department did not have a formal diversity or EEO program and that USCP's Ombudsman Program was inactive. According to USCP officials, its investigators needed more training and experience in conducting EEO investigations. Moreover, USCP's OEC handled disciplinary reviews and legal sufficiency reviews, and represented the Department and Capitol Police Board (Board) in EEO complaints. OIG made four recommendations, which the Department agreed to implement. Based on our follow-up work, the conditions identified in the previous audit have re-emerged because of a lack of continuity that existed in the Department's corrective actions.

**Previous Recommendation 1:** We recommend that the United States Capitol Police finalize its draft Human Capital Strategic Workforce Plan identifying the critical senior level and supervisory/management positions and the needed skills and abilities required for its future diverse workforce. Based on this the Department should specify effective diversification strategies and focus training, career development, and mentoring programs to help minorities and women advance to these positions.

According to Department responses to recommendations related to Report Number OIG-2008-05, the Department published its *USCP Strategic Human Capital Plan Fiscal Years (FY) 2009 - 2013* on the Department's intranet in March 2010 and hired a Diversity Officer to establish a Diversity Program beginning January 2010.

Current Status of Recommendation: OHR has not produced a strategic human capital plan since July 2008. In response to our request for a copy of the most recent strategic human



capital plan, OHR provided us with the *OHR FY 2015-2018 Plan*. The *OHR FY 2015-2018 Plan* does not, however, contain the information required of a strategic human capital plan based on the previous recommendation; it contained information regarding OHR's overall goals, objectives, strategies, and OHR lines of business. Nevertheless, several of the key components required of a *strategic human capital plan* per the previous recommendation were present among other various documents provided by the Department, such as OHR *USCP Strategic Recruitment Plan FY 2017-2019*. Also missing was documentation identifying the critical senior level and supervisory/management positions and skills and abilities required for a diverse workforce. Additionally, efforts to achieve the goals and objectives for succession planning as stated in the *OHR FY 2015-2018 Plan* are incomplete. This assessment addresses the relapse in corrective action, with a new Recommendation 4, previously presented in the section titled *Department Diversity Program*.

**Previous Recommendation 2:** We recommend the United States Capitol Police immediately assign an individual to the Ombudsman Program or rescind General Order [REDACTED]. Additionally, the USCP should finalize and publish its [REDACTED] Directive minimizing any redundancy with the Office of Compliance.

According to Department responses to recommendations related to Report Number OIG-2008-05, the Department rescinded the USCP General Order [REDACTED] dated June 24, 1996. The [REDACTED] Directive was under review and expected to be published in the near future in connection with the new [REDACTED].

**Current Status of Recommendation:** We confirmed that the Department rescinded USCP General Order [REDACTED] dated June 22, 2009. We also confirmed that the Department rescinded USCP General Order [REDACTED], dated March 5, 1999, and published USCP Directive [REDACTED], on May 28, 2012.

**Previous Recommendation 3:** We recommend that the United States Capitol Police determine whether outsourcing the investigation of equal employment opportunity complaints to trained investigators would be more efficient and effective. Further, we recommend the USCP choose the most efficient and effective manner to investigate EEO complaints, within budgetary constraints.

According to Department responses to recommendations related to Report Number OIG-2008-05, the Department determined that it would not be effective to outsource EEO investigations. The response also notes that the members of OPR attended the EEO training course.

**Current Status of Recommendation:** We requested evidence of EEO training for OPR investigators assigned from CY 2012 up to the time of our assessment. A Department official confirmed OPR investigators assigned during this time did not complete EEO

training, which includes the six investigators assigned to OPR. In addition, the Department official stated EEO training failed to occur as investigators transitioned in FY 2016 and FY 2017 because it was an exceptionally busy year with a higher volume of cases. As of May 2018, OPR Investigators are awaiting open class space to attend EEO training. OIG made Recommendation 5 as stated above in the section *Complaint/Discrimination Data*.

**Previous Recommendation 4:** We recommend that the United States Capitol Police Chief Administrative Officer approve a business plan for the Office of Employment Counsel to include a mission statement and policies and procedures linked to the USCP strategic goals and objectives. In addition, the USCP should determine whether the duties of legal sufficiency reviews and agency/Board representation in equal employment opportunity complaints are incompatible and impairs independence, either in fact or appearance, with respect to EEO complainants. If so, consider having legal sufficiency reviews conducted by an element outside of Office of Employment Counsel. Furthermore, the USCP should assess whether a new directive or general order is needed changing the disciplinary processes.

According to Department responses to recommendations related to Report Number OIG-2008-05, the OEC (currently ELD) submitted its business plan for the first quarter of FY 2010 to the Department's Strategic Planning Officer in March 2010. The OEC business plan aligned with the Department's *FY 2010-2014 Strategic Plan*, and therefore the CAO approved the plan.

Current Status of Recommendation: Although ELD has not issued a business plan since 2010, we confirmed that the Department maintained the separation between the sufficiency reviews conducted by the Disciplinary Review Officer (DRO), OGC personnel, and the litigation matters conducted by the ELD. OGC officials stated that it does not handle EEO matters and discrimination allegations. Instead, the ELD of OGC receives notification of matters under the CAA and processes those matters in accordance with *Procedural Rules of the OOC* and court rules, representing USCP and the Board in matters filed. ELD does not perform legal sufficiency reviews but does perform sufficiency reviews of disciplinary cases when OPR forwards cases of serious nature to the DRO for review and recommendation for a determination of the penalty.

## Conclusions

Our assessment on the status of the recommendations from the diversity audit, Report Number OIG-2008-05, confirmed the Department has not continued corrective actions related to two of the four recommendations. The Department did not have documentation identifying the critical senior level and supervisory/management positions and the skills and abilities required for a diverse workforce. As previously mentioned, efforts to complete planned actions in achieving the goal and related objectives on succession planning as stated in the *OHR FY 2015-2018 Plan* were incomplete. Our assessment also

noted USCP OPR investigators have not completed EEO training. OIG, therefore, made Recommendations 4 and 5.

# APPENDICES

## *List of Recommendations*

---

**Recommendation 1:** We recommend that the United States Capitol Police develop a strategic plan that identifies the Office of Inclusion, Diversity, Equity, and Action roles and responsibilities and clearly defines each coordinating office/bureau's (Office of Human Resources, Office of Professional Responsibility, and Employment Law Division) responsibilities and reporting requirements with regard to diversity matters.

**Recommendation 2:** We recommend that the United States Capitol Police design and perform an effective self-evaluation of its diversity management program on a periodic basis. The self-evaluation would include defining tracking methods for obtaining quantitative data on workforce demographics of the United States Capitol Police employees. In addition, the United States Capitol Police should identify segments within its workforce for which to collect qualitative data and accordingly improve qualitative data gathering methods.

**Recommendation 3:** We recommend that the United States Capitol Police update the current agency strategic plan and explicitly include diversity to ensure continuity and progression in the development of diversity management initiatives through integration of diversity management into its strategic plan.

**Recommendation 4:** We recommend that the United States Capitol Police strengthen its succession planning efforts by drafting a plan for succession planning and incorporating it into the Office of Inclusion, Diversity, Equity, and Action and Office of Human Resources diversity management efforts. Accordingly, the United States Capitol Police should create policies and procedures on succession planning, and leadership and career development for civilian and sworn employees as stated in the *Office of Human Resources FY 2015-2018 Plan*.

**Recommendation 5:** We recommend that the United States Capitol Police determine whether training in equal employment opportunity should be required for Office of Professional Responsibility investigators. The determination should address immediate training upon joining the Office of Professional Responsibility and subsequent refresher training to ensure that all Office of Professional Responsibility staff handling any aspect of equal employment opportunity complaints obtains the necessary knowledge pertaining to relevant information, and best practices to ensure efficient and effective processing of those complaints.



## DEPARTMENT COMMENTS



### UNITED STATES CAPITOL POLICE

OFFICE OF THE CHIEF  
119 D STREET, NE  
WASHINGTON, DC 20510-7218

June 11, 2018

Phone: 202-224-1806

COP 180103

#### MEMORANDUM

**TO:** Mr. Michael A. Bolton  
Acting Inspector General

**FROM:** Matthew R. Verderosa  
Chief of Police

**SUBJECT:** Response to Office of Inspector General draft report *Assessment of the United States Capitol Police Workforce Diversity* (Report No. OIG-2018-12)

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendations contained within the Office of Inspector General's (OIG) draft report *Assessment of the United States Capitol Police Workforce Diversity* (Report No. OIG-2018-12).

The Department generally agrees with all of the recommendations and appreciates the opportunity to work with the OIG to further improve upon current policies and procedures currently in place within the Department's Diversity Program. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect to achieve long term resolution of these matters.

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

Very respectfully,

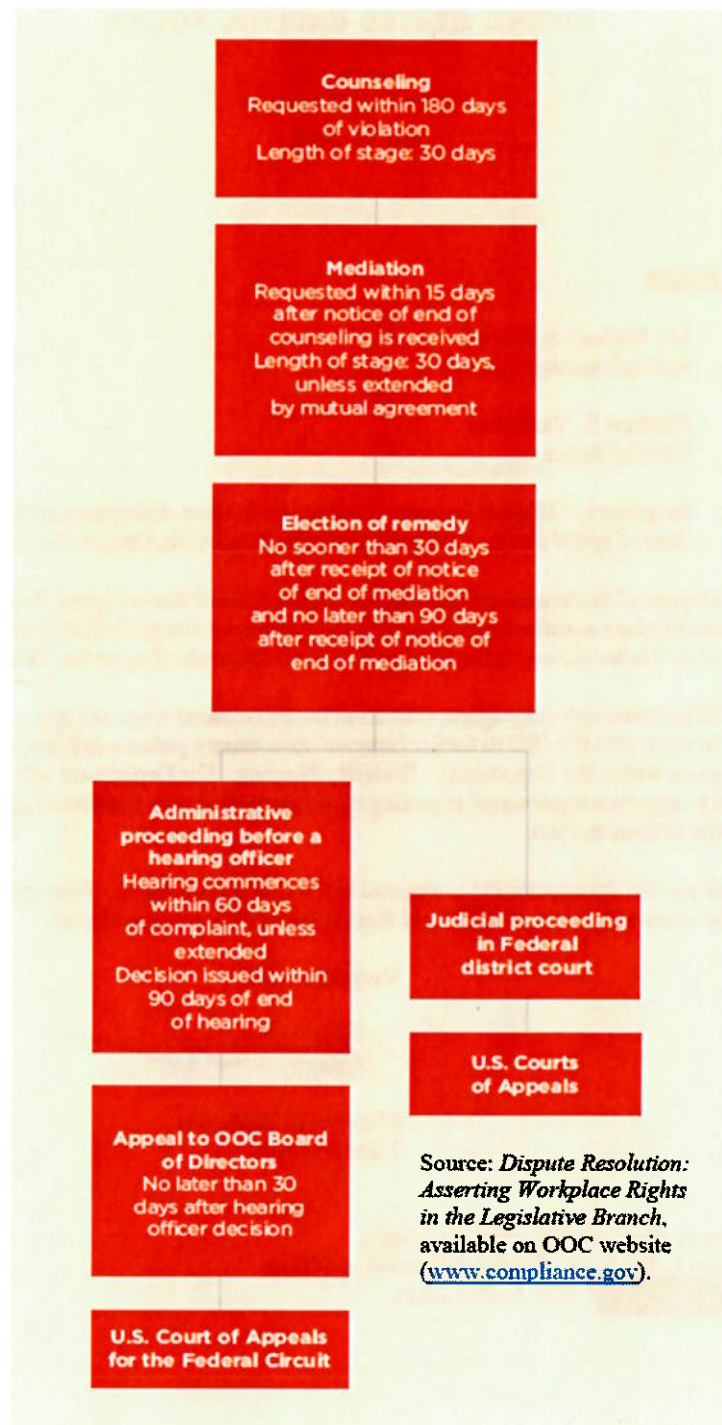
A handwritten signature in black ink, appearing to read "Matthew R. Verderosa".

Matthew R. Verderosa  
Chief of Police

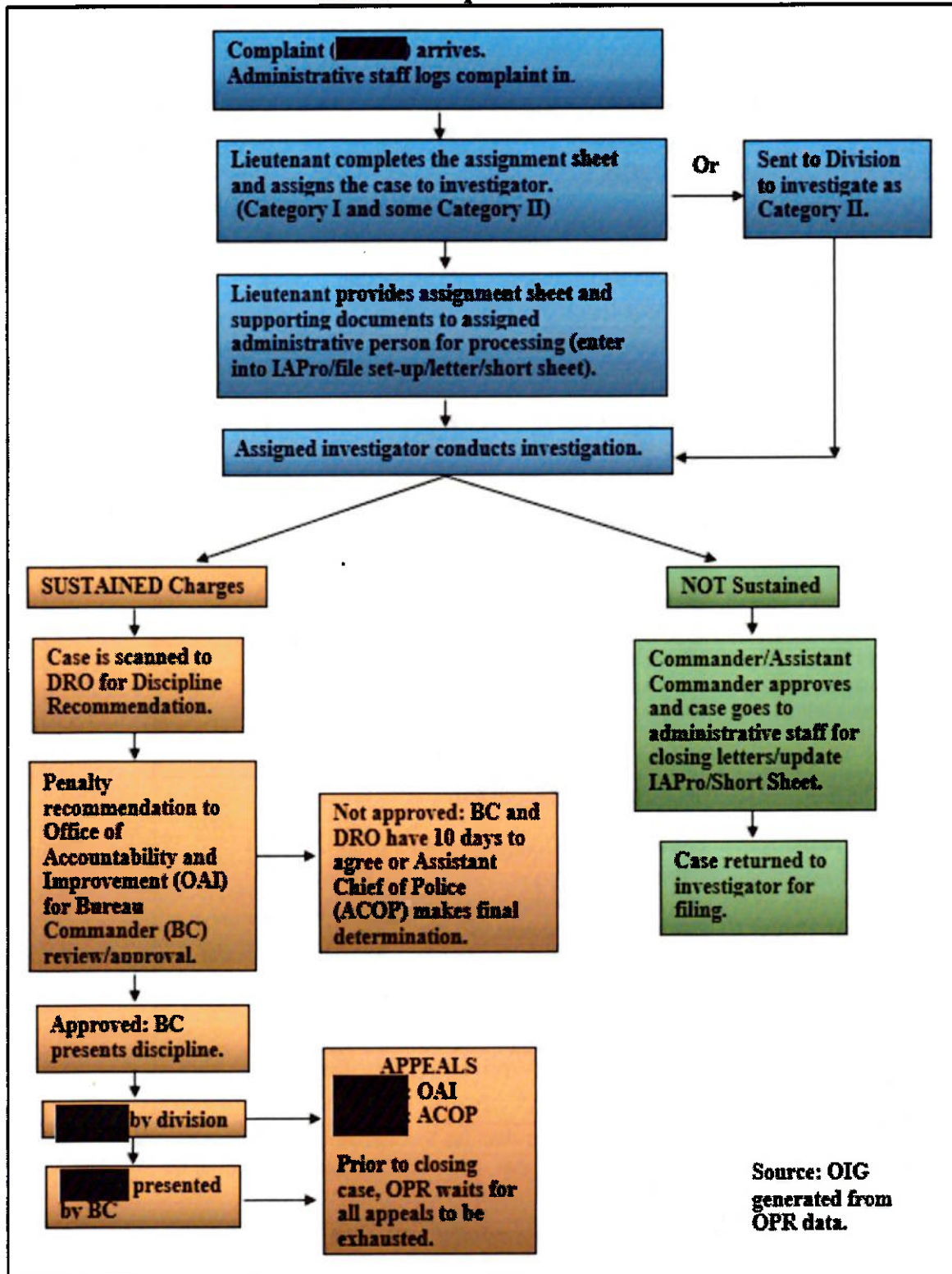
cc: Steven A. Sund, Assistant Chief of Police  
Richard L. Braddock, Chief Administrative Officer  
[REDACTED] USCP Audit Liaison

Nationally Accredited by the Commission on Accreditation for Law Enforcement Agencies, Inc.

## OOC Dispute Resolution Process



## USCP Complaint Process



## USCP Senior Leadership Development Programs

Description of Program	Time Period	Number of Recent Females and Minority Participants	
<p><b><u>Federal Bureau of Investigation National Academy</u></b></p> <p>The Federal Bureau of Investigation National Academy is a professional course of study for U.S. and international law enforcement managers nominated by their agency heads because of demonstrated leadership qualities. The 10-week program—which provides coursework in intelligence theory, terrorism and terrorist mindsets, management science, law, behavioral science, law enforcement communication, and forensic science—serves to improve the administration of justice in police departments and agencies at home and abroad and to raise law enforcement standards, knowledge, and cooperation worldwide.</p>	2012 to Present	Females	2
<p><b><u>Supervisory Leadership Training Program (SLTP)</u></b></p> <p>The SLTP is a USCP program provided by Training Services Bureau to newly promoted supervisors. It is a comprehensive professional development training course, taught by USCP subject matter experts, to enhance core leadership skills and equip supervisors with agency specific knowledge needed to develop a broader understanding of how to make effective decisions, manage cultures, and identify the impacts it has on the organization as a whole.</p>	2012 to Present	Minority	3
<p><b><u>Johns Hopkins Police Executive Leadership Program</u></b></p> <p>The Division of Public Safety Leadership (PSL) began in 1994 as the Police Executive Leadership Program. This unique program, is built on a demanding leadership, liberal arts, and humanities curriculum, was begun by Dean Emeritus Stanley C. Gabor who, at the time, led the Johns Hopkins University School of Continuing Studies. Beginning with a single cohort group of 24 police executives, PSL currently sponsors numerous cohort classes, in multiple locations, with a student population representing law enforcement, fire/emergency medical service, emergency management, public health, transit, campus safety, private security, the intelligence community, and the military.</p>	2012-2015	Females	18*
<p>Minority</p> <p>1</p> <p>* Per OHR data on program participants, gender data for 8 out of 91 SLTP participants was not available. ** Footnote - Per OHR data on program participants, ethnicity/race data for 7 out of the 91 SLTP participants was not available.</p>			

Source: OIG generated using Training Services Bureau data on USCP leadership programs from CY 2012 to current date and OHR data on leadership program participants from FYs 2016 to 2017.



**EEO MD-715 Elements and USCP Fulfillment**

EEO MD-715	Description	YES	NO	N/A
1. Demonstrated Commitment from Agency Leadership.	This element requires agency heads and other senior management officials to demonstrate a firm commitment to equality of opportunity for all employees and applicants for employment. To that end, agency heads must issue a written policy statement expressing commitment to EEO and a workplace free of discriminatory harassment. The agency heads should issue the statement at the beginning of their tenure and thereafter on an annual basis and disseminated to all employees.	X		
2. Integration of EEO into the Agency's Strategic Mission	Maintain a reporting structure that provides the agency's EEO Director with regular access to the agency head and other senior management officials for reporting on the effectiveness, efficiency and legal compliance of the agency's Title VII and Rehabilitation Act programs. To emphasize the importance of the position, the agency head should be involved in the selection and performance review of the EEO Director.		X	
	Ensure EEO professionals are involved with, and consulted on, management and deployment of human resources. The EEO Director should be a regular participant in senior staff meetings and regularly consulted on human resources issues.		X	
	Allocate sufficient resources to create and/or maintain Title VII and Rehabilitation Act programs that: (1) Identify and eliminate barriers that impair the ability of individuals to compete in the workplace because of race, national origin, sex or disability. (2) Establish and maintain training and education programs designed to provide maximum opportunity for all employees to advance. (3) Ensure that unlawful discrimination in the workplace is promptly corrected and addressed.		X	
	Recruit, hire, develop and retain supervisors and managers who have effective managerial, communications and interpersonal skills. Provide managers and supervisors with appropriate training and other resources to understand and successfully discharge their duties and responsibilities.	X		
	Involve managers and employees in the implementation of the agency's EEO program.	X		

EEO MD-715	Description	YES	NO	N/A
3. Management and Program Accountability	Conduct regular internal audits, on at least an annual basis, to assess the effectiveness and efficiency of the Title VII and Rehabilitation Act programs and to ascertain whether the agency has made a good faith effort to identify and remove barriers to equality of opportunity in the workplace.		X	
	Establish procedures to prevent all forms of discrimination, including harassment, retaliation and failure to provide reasonable accommodation to qualified individuals with disabilities.		X	
	Evaluate managers and supervisors on efforts to ensure equality of opportunity for all employees.	X		
	Ensure effective coordination between the agency's EEO programs and related human resource programs.		X	
	Review each finding of discrimination to determine the appropriateness of taking disciplinary action against agency officials involved in the matter. Track these decisions and report trends, issues and problems to agency leadership for appropriate action.	X		
4. Proactive Prevention of Unlawful Discrimination	Agencies must conduct a self-assessment on at least an annual basis to monitor progress, identify areas where barriers may operate to exclude certain groups and develop strategic plans to eliminate identified barriers.			X
5. Efficiency	Maintain an efficient, fair, and impartial complaint resolution process. Agencies should benchmark against EEOC regulations at 29 C.F.R. Part 1614 and other Federal agencies of similar size highly ranked in EEOC's <i>Annual Report on the Federal Work Force</i> on the Federal sector complaints process.	X		
	Ensure that the agency keeps the investigation and adjudication function of the agency's complaint resolution process separate from the legal defense arm of the agency or other agency offices with conflicting or competing interests.	X		
	Establish and encourage the widespread use of a fair ADR program that facilitates the early, effective and efficient informal resolution of disputes. Appoint a senior official as the dispute resolution specialist of the agency charged with implementing a program to provide significant opportunities for ADR for the full range of employment-related disputes. Whenever ADR is offered in a particular workplace matter, ensure that managers at all appropriate levels will participate in the ADR process.	X		
	Have effective and accurate data collection systems in place to evaluate its EEO program.		X	
	Identify and disseminate significant trends and best workplace practices in its EEO program.	X		

EEO MD-715	Description	YES	NO	N/A
6. Responsiveness and Legal Compliance	Have processes in place to ensure timely and full compliance with EEOC orders and settlement agreements.			X
	Comply with the law, including EEOC regulations, management directives, orders, and other written instructions.			X
	Report to EEOC its program efforts and accomplishments.			X

Source: OIG generated from evaluation of EEO MD-715.

**GAO's Leading Practices for Diversity Management  
and USCP Fulfillment**

GAO Leading Diversity Management Practices	Assessment		
	Practicing	Not Practicing (x) Can be Improved (xx)	Planning to Practice
1. Top leadership commitment	X		
2. Diversity as part of an organization's strategic plan		XX	
3. Diversity linked to performance	X		
4. Measurement		XX	
5. Accountability			X
6. Succession planning			X
7. Recruitment	X		
8. Employee involvement	X		
9. Diversity training			X

Source: OIG generated from evaluation of GAO's leading practices.



### USCP Recruiting Activity for CY 2017

Date	Recruiting Activity	Location
04/27/2017	LOC Outreach	Washington, D.C.
05/19/2017	Maryland National Capital Police Career Fair	Landover, Maryland
06/08/2017	Job Zone Career Fair	Fredericksburg, Virginia
06/12/2017	Inaugural 10th Congressional District Veterans Jobs Fair	Ashburn, Virginia
06/17/2017	Recruit Military Career Fair	Baltimore, Maryland
06/21/2017	Job Zone Career Fair	Fort Lee, Virginia
06/22/2017	Recruit Military Career Fair	Washington, D.C.
07/14/2017	Military For Hire Resources and Career Fair – Vet Ready	Washington, D.C.
08/15/2017	Job Zone Career Fair	Patuxent River, Maryland
08/17/2017	Job Zone Career Fair	Joint Base Andrews, Maryland
09/14/2017	John Jay Career Fair	New York, New York
09/15/2017	Columbia University	New York, New York
09/20/2017	University of Maryland	College Park, Maryland
09/28/2017	Job Zone Career Fair	Dahlgren (King George), Virginia
09/28/2017	University of New Haven	West Haven, Connecticut
09/29/2017	Towson State Career Fair	Towson, Maryland
10/05/2017	University of Maryland Eastern Shore	Princess Anne, Maryland
10/11/2017	West Pac Career Fair	Pittsburgh, Pennsylvania
10/17/2017	Arizona State Career Fair	Tempe, Arizona
10/18/2017	Job Zone Career Fair	Fort Lee, Virginia
10/18/2017	Morgan State	Baltimore, Maryland
10/19/2017	Maryland Law Enforcement Expo	Frederick, Maryland
10/19/2017	Prince George's Community College	Largo, Maryland
10/26/2017	University of Virginia	Charlottesville, Virginia
10/27/2017	Howard Community College	Columbia, Maryland
11/01/2017	Fayetteville State University	Fayetteville, North Carolina
11/02/2017	North Carolina State Career Fair	Raleigh, North Carolina
11/09/2017	Big East Career Consortium Virtual Career Fair	N/A
11/14/2017	Job Zone Career Fair	Patuxent River, Maryland
11/16/2017	Job Zone Career Fair	Joint Base Andrews, Maryland
11/17/2017	Orlando Jobs Career Fair	Orlando, Florida
11/29/2017	Law Enforcement Expo – New Orleans	Metairie, Louisiana
12/19/2017	Law Enforcement Expo – Sacramento	Sacramento, California

Source: USCP OHR.

**This page intentionally left blank**

## **CONTACTING THE OFFICE OF INSPECTOR GENERAL**

Success of OIG mission to prevent fraud, waste, abuse, or mismanagement depends on the cooperation of employees and the public. There are several ways to report questionable activity.

---

Call us at 202-593-3868 or toll-free at 866-906-2446. A confidential or anonymous message can be left 24 hours a day/7 days a week.

Toll-Free - 1-866-906-2446



---

Write us:

*United States Capitol Police  
Attn: Office of Inspector General  
499 South Capitol St. SW, Suite 345  
Washington, DC 20003*



Or visit us:

*499 South Capitol Street, SW, Suite 345  
Washington, DC 20003*



You can also contact us by email at:

---

**When making a report, convey as much information as possible such as: Who? What? Where? When? Why? Complaints may be made anonymously or you may request confidentiality.**

---

### **Additional Information and Copies:**

To obtain additional copies of this report, call OIG at 202-593-4201.

