



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Assessment of the United States Capitol Police Telework and Alternative Work Schedule Programs

Report Number OIG-2018-15

September 2018

Report Restriction Language

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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.

M. L. 12-

Michael A. Bolton, Acting Inspector General

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Abbreviations and Acronyms

Alternative Work Schedule	AWS
Calendar Year	CY
Chief Administrative Officer	CAO
Office of Human Resources	OHR
Office of Inspector General	OIG
Office of Personnel Management	OPM
Office of Personnel Management Guide to Telework in the Federal Government	OPM's guide
United States Capitol Police	USCP or the Department

EXECUTIVE SUMMARY

Laws encouraging telework and alternative work schedules (AWSs) have been in effect in the Federal Government sector for more than 2 decades. Congress and the President signaled their support for flexible work-life programs by passing the *Federal Employees Flexible and Compressed Work Schedules Act of 1982*, Public Law 97-221, under Title 5 of United States Code. The *Telework Enhancement Act of 2010*, Public Law 111-292, required that each executive branch agency establish and implement a policy under which employees shall be authorized to telework.

The United States Capitol Police (USCP or the Department) established a civilian telework program in 2010. According to a Department official, USCP began practicing AWS "in the 2008/2009 time period."

In accordance with our *Annual Performance Plan Fiscal Year 2018*, the Office of Inspector General (OIG) assessed the USCP Telework and AWS programs. Our objectives were to determine if the Department had (1) sufficient Telework and AWS program guidance, (2) the ability to measure program utilization, and (3) administered the Telework and AWS programs in accordance with best practices. Our scope included calendar year 2017 through March 31, 2018.

The Department did not have sufficient program guidance for implementing key best practices or identifying and documenting benefits associated with telework and AWS. Additionally, the Department did not have the ability to measure program utilization. For example, USCP did not have a methodology for collecting, validating, and reporting telework and AWS data. Finally, USCP did not administer the Telework and AWS programs in accordance with best practices. For example, the Department's program coordinator did not maintain all telework agreements. USCP should make improvements that will ensure success of the USCP Telework and AWS programs.

On August 23, 2018, OIG provided a draft report to Department officials for comment, and conducted an exit conference on September 13, 2018. We incorporated the Department's comments as applicable and attached the response to the report in its entirety in Appendix B.

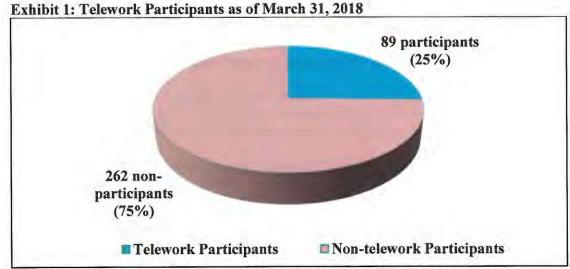
Background

Workforce expectations regarding workplaces and flexible working methods have evolved over time in the direction of meeting organizational objectives while respecting personal life balance for employees.

The Office of Personnel Management (OPM) provides guidance to participating telework entities. OPM requires that executive branch agencies prepare annual reports. As a legislative branch agency, the United States Capitol Police (USCP or the Department) is not required to follow OPM guidance. The Department established a telework program in 2010. USCP , dated November 19, 2015, established the role of a Telework Program Coordinator. According to the Directive, the Telework Program Coordinator is "the individual within Office of Human Resources (OHR) who has responsibility for overseeing the USCP Telework Program, maintaining telework agreements and records. providing advice and guidance to supervisors and employees on this Directive and the USCP Telework Program, and regularly providing telework reports." Telework is an arrangement under which eligible Department employees regularly or intermittently perform the duties and responsibilities of his/her permanent position, and other authorized work activities, from the employee's home or another Departmentauthorized worksite away from the employee's regular worksite. Employee participation in the USCP Telework Program is open to eligible employees. The Department determines eligibility based on criteria such as suitability of tasks, length of service, and employee performance as prescribed per Directive Directive identifies responsibilities for supervisors and employees. To facilitate the responsibilities, Directive contains documentation requirements. The forms used in support of USCP's Telework Program include the following: - This request form contains the telework employee's name and occupational information, expected frequency of telework arrangement, specific work schedule, equipment and supplies furnished, and other evaluation information. The supervisor must approve the form prior to telework commencing. - This form, completed by the telework candidate, provides a level of assurance that the alternate worksite proposed is a safe work environment. The form includes a questionnaire related to the workplace environment and computer workstation. The form must be submitted along with a and receive supervisory approval before telework may commence. - This form is used to terminate telework arrangements either voluntarily or involuntarily. The form requires both employee and supervisor signature and contains reasoning for involuntary withdrawal.

This form provides date, tour of duty for workday, proposed work activities, and actual work activities for a given pay period. The employee completes the form each day of work when conducting work off-site to document work performed.

Except in emergency situations determined by the Chief of Police or designee, sworn employees in the Department, regardless of assignment, were not eligible for participation in the USCP Telework Program. The Chief Administrative Officer (CAO) stated that not all civilian employees were eligible for telework and that the Department evaluates telework positions on a case-by-case basis. According to documentation OHR provided, as of March 31, 2018, the Department had 351 civilian employees, 89 (25 percent) of whom were telework participants. See Exhibit 1 for the composition of telework participants.

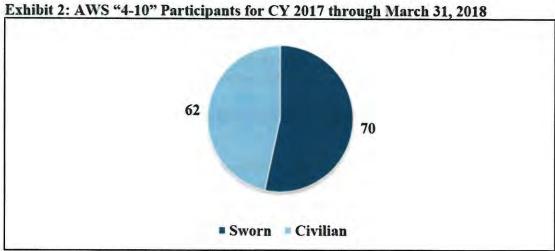


Source: Office of Inspector General (OIG) generated from OHR data as of March 31, 2018.

According to OPM's Handbook on Alternate Work Schedule (undated), an Alternate Work Schedule (AWS) includes flexible and compressed work schedules. A flexible work schedule includes a schedule that has designated hours and days when an employee must be present for work while a compressed work schedule means that an employee's basic work requirement for each pay period is scheduled (by the agency) for less than 10 workdays. The Department had two types of AWS, the "4-10" and the "first 40". The "4-10" is an AWS where employees work 10 hour shifts, 4 days each week. The "first 40" is another AWS where employees have flexibility on when they arrive and depart as long as they reach 40 hours for a given week.

The Department did not consider AWS as a program and did not have formal policies and procedures. It remains within the discretion of Department supervisors to determine employee eligibility for participation in AWS. According to documentation provided by the Department, 132 employees participated in the "4-10" schedule during Calendar Year

(CY) 2017 through March 31, 2018. Of the 132 participants, 62 were civilian and 70 were sworn employees. See Exhibit 2 for the number of sworn and civilian employees participating in a "4-10" AWS. Of the 70 sworn employees, 62 were from Operational Services Bureau; 5 from Security Services Bureau; 2 from Uniform Services Bureau; and 1 from Training Services Bureau. The number of employees participating in "first 40" is unknown.



Source: OIG generated from OHR data as of March 31, 2018.

OBJECTIVES, SCOPE, AND METHODOLOGY

OIG objectives were to determine if the Department had (1) sufficient Telework and AWS program guidance, (2) the ability to measure program utilization, and (3) administered the Telework and AWS programs in accordance with best practices. Our scope included CY 2017 through March 31, 2018.

To accomplish our objectives, we interviewed USCP officials to gain an understanding of the Department's Telework and AWS programs. We also reviewed the following laws, guidance, and industry best practices:

- Interim Guidance, dated February 24, 2017
- Directive , dated November 19, 2015
- Government Accountability Office, Standards for Internal Control in the Federal Government, GAO-14-704G, dated September 2014
- Directive
 , dated May 28, 2012

- Office of Personal Management Guide to Telework in the Federal Government, dated April 2011
- Telework Enhancement Act of 2010, Public Law 111-292, dated December 9, 2010
- Memorandum on Expanding Family-Friendly Work Arrangements in the Executive Branch, dated July 11, 1994
- Federal Employees Flexible and Compressed Work Schedules Act, Public Law 97-221, Title 5 of the United States Code, dated July 23, 1982
- OPM, Handbook on Alternative Work Schedules, date unknown (retrieved from OPM website on May 18, 2018)

To determine if the Department had sufficient Telework and AWS program guidance, we assessed Department guidance alignment with laws and regulations pertaining to telework and AWS. We interviewed Department officials to further our understanding of Department practices.

To evaluate whether the Department had the ability to measure program utilization, we requested copies of the three most recent annual audits of the USCP Telework Program and reports prepared by the Telework Program Coordinator for submission to the OHR Director.

To assess administration of the program in accordance with best practices, we requested a list of telework positions, telework participants, and telework agreements. USCP Directive includes several of these best practices.

Table 1: Samples for Telework Program

Routine Teleworkers	Situational Teleworkers	Totals
17	10	27

Source: OIG generated from OHR data related to CY 2017 through March 31, 2018.

We used the Federal Employees Flexible and Compressed Work Schedules Act and OPM Guide to Telework in the Federal Government (OPM's guide) as best practices. However, as a legislative branch agency, the Department did not have to follow these practices.

We conducted this assessment in Washington, D.C., from April through July 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 August 23, 2018, we provided a draft copy of this report to Department officials for comment. On September 13, 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

Overall, the Department did not have sufficient program guidance for implementing key best practices or identifying and documenting benefits associated with telework and AWS. In addition, the Department did not have the ability to measure program utilization. Finally, the Department did not fully administer the Telework and AWS programs in accordance with best practices.

Sufficiency of USCP Program Guidance

USCP's Telework Program guidance was not sufficient, and the Department did not have formal policies or procedures for AWS.

Absence of Key Best Practices

USCP's telework guidance, Directive whom, is not sufficient. We compared the USCP Directive to OPM's guide. While the USCP Directive includes several of the best practices outlined in OPM's guide, there are key parts of OPM's guide not included in the USCP Directive.

OPM's guide included several best practices such as:

- Specific requirements for record keeping, reporting, and evaluation of the program.
- Agency requirements for telework training.
- Avoidance of ambiguous terms and redundancies in telework guidance.

However, USCP's Directive did not include these best practices. For example, the Directive does not provide specific details with regard to record keeping, reporting, or evaluation of the program. Additionally, there are no training requirements in the USCP Directive. Finally, USCP's Directive requires supervisors to document their rationale for decisions made on telework requests. The Directive states that "For each telework request, [supervisors] document the decisions and the rationale for such decisions." lists several reasons for not approving a request that would serve as the "rationale" in case of a disapproval. However, does not include the equivalent for approvals. Without incorporating key best practices into the USCP Directive, the Department is at risk of inconsistent administration of the program.

Lack of Program Guidance

The Department did not have formal policies or procedures for AWS. The Government Accountability Office's Standards for Internal Control in the Federal Government, dated September 2014, states:

Management documents in policies for each unit its responsibility for an operational process's objectives and related risks, and control activity design, implementation, and operating effectiveness. Each unit, with guidance from management, determines the policies necessary to operate the process based on the objectives and related risks for the operational process. Each unit also documents policies in the appropriate level of detail to allow management to effectively monitor the control activity.

According to Department officials, there are two types of AWS, the "4-10" and the "first 40". The "4-10" is an AWS where employees work 10 hour shifts, 4 days each week. The "first 40" is another AWS where employees have flexibility on when they arrive and depart as long as they reach 40 hours for a given week. USCP officials stated that "first 40" is not a formal process and that a written policy does not exist. The Department does not document or keep track of "first 40" AWS hours. The Department could not identify employees participating in the "first 40" because it did not have any policies for AWS. Without basic record keeping, USCP cannot ensure accountability of "first 40" AWS participants. According to Department documentation, 132 employees (62 civilian and 70 sworn) were practicing a "4-10" schedule as of March 31, 2018. Without official guidance describing the operation of AWS, the program lacks transparency and may be susceptible to abuse.

Conclusions

The Department's telework guidance did not include several key best practices outlined in OPM's guide. Additionally, the Department did not have formal policies or procedures for AWS. OIG, therefore, makes the following recommendations.

Recommendation 1: We recommend	that the United	States Capitol Police
(USCP) update the USCP Directive		, dated
November 19, 2015, to:		

- a. Include clear and specific requirements for record keeping, reporting, and evaluation of its Telework Program and methodologies.
- b. Incorporate training requirements to ensure the effective performance of the Telework Program.
- c. Clarify the requirement with regard to supervisors' documentation of the rationale for decisions made on telework requests and update , accordingly.

Recommendation 2: We recommend that the United States Capitol Police develop and implement a policy that addresses Alternative Work Schedules (AWS) and specifically incorporate the current "4-10" and "first 40" AWS practices.

USCP Ability to Measure Program Utilization

The Department lacked the ability to measure Telework and AWS program utilization. The Department did not have a systematic method of tracking the number of hours teleworked by employees in a given timeframe. OPM's guide recommends that the agency describe in the policy the system and workflow being used to capture participation of the various types of telework, such as bi-weekly work reports, time and attendance systems, and instructions to managers and employees that such information must be carefully and consistently collected either manually or electronically for reporting purposes. OPM's Handbook on Alternative Work Schedules, states that agencies wishing to participate in an AWS program must establish a time accounting method that provides supervisors with "affirmative" or personal knowledge of each employee's number of duty hours, attendance, and the nature and length of absences.

The Department's time and attendance system, did not have a functionality that would allow users to make a distinction between regular hours worked in the office and hours teleworked. Additionally, as noted previously, USCP did not have an AWS policy and could not identify employees working a "first 40" AWS. Without the ability to track telework hours or AWS hours, management is unable to measure program utility.

Conclusions

USCP did not measure Telework or AWS program utility because they lacked a systematic method for tracking telework and AWS hours. OIG, therefore, makes the following recommendations:

<u>Recommendation 3</u>: We recommend that the United States Capitol Police develop a system to track telework and alternate work schedule hours.

Administration of the Programs in Accordance with Department Policies, Procedures, and Best Practices

The Department did not administer its Telework Program in accordance with policies and procedures. Key deficiencies included, OHR not completing accountability reports and audits, failure to maintain telework agreements, failure to notify supervisors of hours worked, and failure to complete telework logs. Additionally, the Department did not have policies and procedures to administer AWS in accordance with best practices.

Failure to Prepare Regular Reports and Conduct Audits

The Telework Program Coordinator did not prepare regular reports or conduct required audits. USCP Directive requires that the Telework Program Coordinator "support accountability with annual audits of the USCP Telework Program to ensure compliance with participation requirements." Additionally, the Directive requires that the Telework Program Coordinator "provide regular reports on the USCP Telework Program to the OHR Director." According to Department officials, there have been intermittent vacancies in the Telework Program Coordinator role since issuance of the Directive in 2015, and as of July 2018 there is only an Acting Telework Program Coordinator. Without regular accountability reports and audits, management may not be able to effectively administer and evaluate the Telework Program.

Lack of Telework Position Eligibility Determination

USCP did not identify telework eligible positions and notify all employees of their , supervisors are to identify positions eligibility. According to USCP Directive appropriate for off-site work and the Chief of Operations or CAO are to approve those determinations prior to teleworking. Additionally, according to the Telework Enhancement Act of 2010, agencies are required to "determine the eligibility for all employees of the agency to participate in telework and notify all employees of the agency of their eligibility to telework." The determinations and approvals outlined in Directive did not occur. The Department did not differentiate between approval of eligible positions and approval of an employee's request for telework. The Department's interpretation of eligibility determination is that approval of telework agreements functions as the de facto final approval for both position and the employee's request to telework. Without identifying all eligible telework positions, USCP cannot ensure consistent implementation of the Telework Program and may be susceptible to accusations of unfair treatment.

Failure to Maintain Telework Agreements

The Department did not maintain telework agreements for employees. Directive states that OHR should "maintain all USCP telework agreements, both approved and disapproved." However, OHR only maintained telework agreements for

OHR employees. Without consistently collecting and maintaining all telework agreements, the Department cannot accurately measure its Telework Program compliance.

Failure to Complete
Employees preparing telework agreements did not always complete a Directive requires that teleworkers complete a with their telework agreement.
Telework participants did not always complete the checklist. Of the 89 teleworking employees, the Department could not provide a for nine of the employees. Failure to complete the form could lead to a lack of employee awareness of the safety requirements for an alternate worksite and increase the risk of potential liabilities for the Department.
Failure to Use Current Telework Agreement Form

The Department used outdated telework agreement forms. GAO's Standards for Internal Control in the Federal Government states:

Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks. If there is a significant change in an entity's process, management reviews this process in a timely manner after the change to determine that the control activities are designed and implemented appropriately . . .

In November 2015, the Department updated the However, we noted that 2 of the 27 samples utilized the January 2011 version of the form. The old version requires the signature and date of the approving supervisor and approving official while the newer version only requires the supervisor's signature and date. The inconsistent use of the form reduces management's ability to effectively administer the program.

Failure to Annually Renew Telework Agreements

The Department did not ensure that employees renewed and supervisors reviewed telework agreements each year. Directive requires that supervisors "Review and revise individual telework agreements at least annually to determine if a need still exists for the telework agreement to remain in effect."

Supervisors failed to ensure timely renewal of telework agreements. Of the 89 employees who were teleworking, 15 employees prepared their telework agreement late, and the Department could not provide telework agreements to cover the entire audit period for 33 other employees.

Exhibit 3 below illustrates the results for renewal testing of telework agreements for 89 employees.

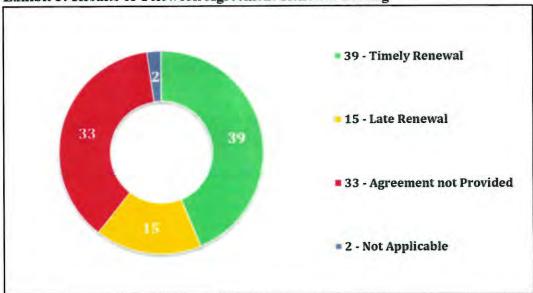


Exhibit 3: Results of Telework Agreement Renewal Testing

Source: OIG generated using telework agreements from CY 2016 - June 2018.

Failure to review and modify telework agreements in a timely manner decreases management's ability to administer the Telework Program.

Lack of Annual Performance Evaluation

Ineligible employees participated in the Telework Program. Directive requires that employees maintain an overall performance evaluation of "Meets Expectations" or higher on their annual performance evaluation to be eligible to telework.

Of the 27 sampled employees, USCP could not provide an up-to-date performance evaluation for 13 employees. Of the 13 employees, 2 did not have any performance appraisals on file, and 11 had not had an appraisal in 2 or more years. Without annual performance evaluations, management cannot document that teleworking employees are meeting Department expectations and are eligible to telework.

Failure to Notify Supervisors and Timekeepers of Hours Worked

Of the 27 employees tested, the Department could not provide evidence of notification sent to supervisors for 15 employees documenting the beginning and/or end of shift. Additionally, the Department could not provide evidence of notification sent to timekeepers for 20 employees documenting the beginning and/or end of shift. Without notification from employees at the start and end of shifts, supervisors cannot ensure that teleworking employees are adhering to their tour of duty hours.

Failure to Document Rationale for Decisions on Telework Requests Supervisors did not document the decision rationale for telework requests. Directive states that supervisors should "document the decisions and the rationale for such decisions" for each request. Supervisors did not document their decision rationale made on telework agreements for 27 of the 27 employees tested. lists several reasons for not approving a request that would serve as the "rationale" in case of a disapproval. However, does not include the equivalent for approvals. Failure to have consistent rationale used for decisions made on telework requests could leave the Department susceptible to accusations of unfair treatment Failure to Complete Telework Logs Teleworking employees did not always complete telework logs that documented the tasks they performed while teleworking. states, "The employee agrees to document all work performed on a Of the 27 employees tested, 7 employees did not complete telework logs. One employee prepared a weekly status report which did not distinguish between tasks completed while teleworking and tasks completed on-site. Failure to utilize and enforce completion of telework logs creates an inability to properly manage, assess, and monitor performance of the teleworking employee. Lack of Evidence to Support Telework on Inclement Weather Day The Department could not provide evidence that telework ready employees worked as scheduled on March 2, 2018, the day USCP operated under an unscheduled leave/unscheduled telework day. According to Directive "Administrative leave will not be granted for absences for employees who are scheduled to telework on a day when the USCP is operating under an administrative leave policy for non-emergency personnel." Of the 27 sampled employees at least 4 were scheduled to telework on March 2, 2018. USCP could not, however, provide evidence that 2 of the 4 employees teleworked as scheduled on that day. does not have a functionality to distinguish between regular hours and telework hours.

Without a mechanism to systematically record telework hours, USCP cannot determine whether employees are following Department policy on days it operates under an unscheduled leave/telework policy. Such a condition could increase the risk of telework abuse.

Lack of Periodic Reviews of AWS

The Department did not conduct periodic reviews of its AWS Program. The Federal Employees Flexible and Compressed Work Schedules Act requires that the agency head assess any adverse impact of AWS and determine continuation of AWS. The Department did not have policies for AWS.

Although the Federal Employees Flexible and Compressed Work Schedules Act does not apply to USCP as a legislative branch agency, we believe that this act constitutes best practices. Without periodic reviews of AWS, the Department cannot assess the effectiveness of the program. OIG made Recommendation 2 as stated above in section Sufficiency of USCP Program Guidance, where we recommended that USCP develop a policy for AWS. Such a policy should incorporate a periodic review of the program.

Conclusions

Overall, the Department did not fully comply with its policies and procedures. Additionally, USCP did not incorporate some best practices into its Telework and AWS programs. Thus, OIG makes the following recommendations:

Recommendation 4: We recommend that the United States Capitol Police (USCP or the Department) ensure that the Telework Program Coordinator is performing annual audits and preparing reports on the USCP Telework Program. Additionally, the Department should establish a standard operating procedure that provides guidance to the Telework Program Coordinator on how to perform the annual audits and prepare the reports.

Recommendation 5: We recommend that the United States Capitol Police	
(USCP) ensure full compliance with Directive	
dated November 19, 2015 and any subsequent versions of a	
Directive.	

APPENDICES

List of Recommendations

	udation 1: We recommend that the United States Capitol Police (USCP) USCP Directive , dated
_	19, 2015, to:
	nclude clear and specific requirements for record keeping, reporting, and luation of its Telework Program and methodologies.
	ncorporate training requirements to ensure the effective performance of Telework Program.
	Clarify the requirement with regard to supervisors' documentation of the ionale for decisions made on telework requests and update , accordingly.
rati	onale for decisions made on telework requests and update

<u>Recommendation 2</u>: We recommend that the United States Capitol Police develop and implement a policy that addresses Alternative Work Schedules (AWS) and specifically incorporate the current "4-10" and "first 40" AWS practices.

<u>Recommendation 3</u>: We recommend that the United States Capitol Police develop a system to track telework and alternative work schedule hours.

Recommendation 4: We recommend that the United States Capitol Police (USCP or the Department) ensure that the Telework Program Coordinator is performing annual audits and preparing reports on the USCP Telework Program. Additionally, the Department should establish a standard operating procedure that provides guidance to the Telework Program Coordinator on how to perform the annual audits and prepare the reports.

<u>Recommendation 5</u> : We recommend t <u>hat the United States Capitol P</u>	<u>'olic</u> e (USCP)
ensure full compliance with Directive	, dated
November 19, 2015 and any subsequent versions of a	Directive.

DEPARTMENT COMMENTS



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UNITED STATES CAPITOL POLICE

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

August 29, 2018

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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 Telework and Alternative Work Schedule Programs (Report

No. OIG-2018-15)

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 Telework and Alternative Work Schedule Programs (Report No. OIG-2018-15).

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 Telework and Alternative Work schedule. 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 apportunity 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,

Matthew R. Verderosa

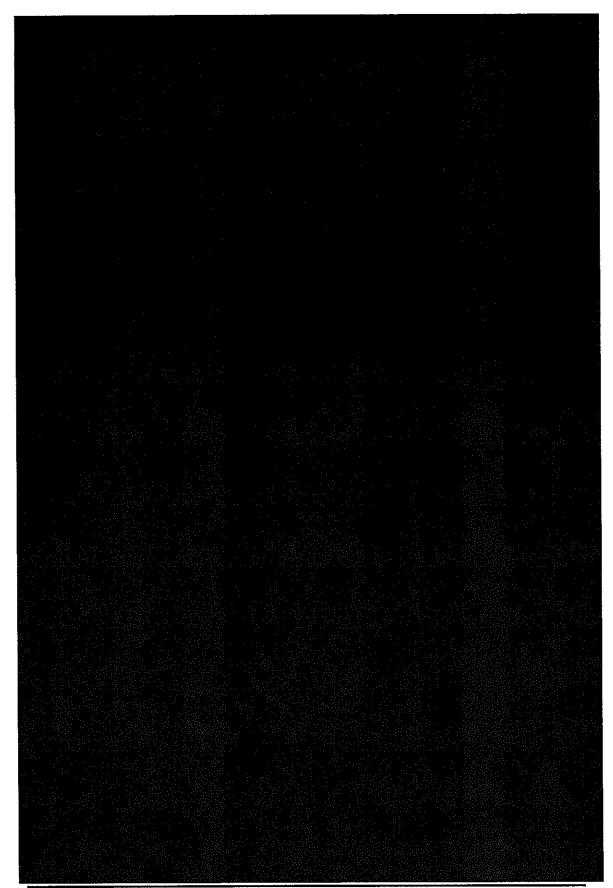
Chief of Police

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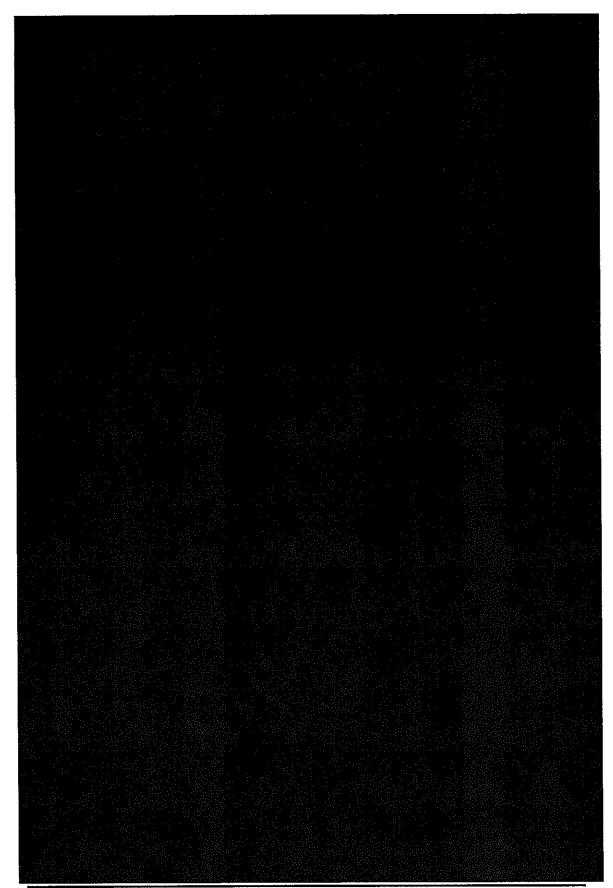
Steven A. Sund, Assistant Chief of Police Richard L. Braddock, Chief Administrative Officer

USCP Audit Liaison

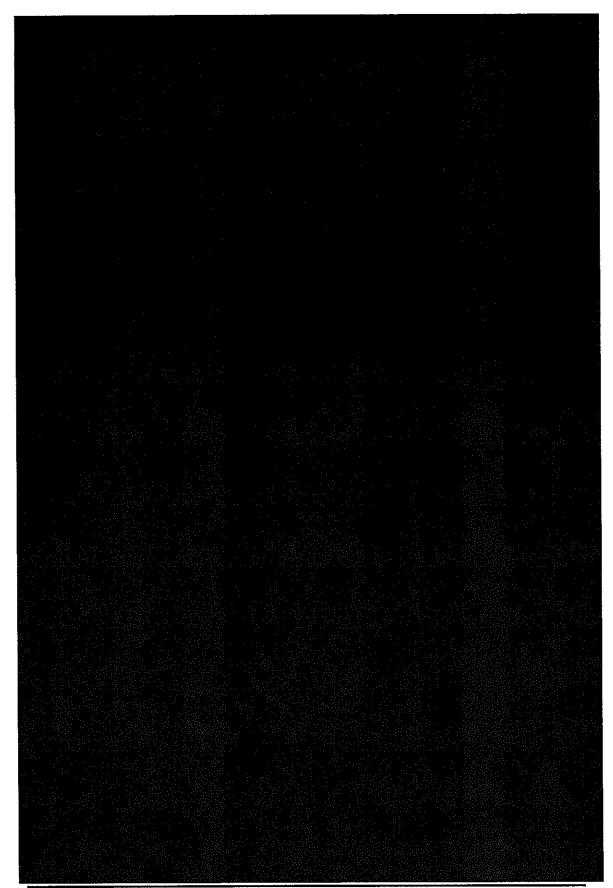
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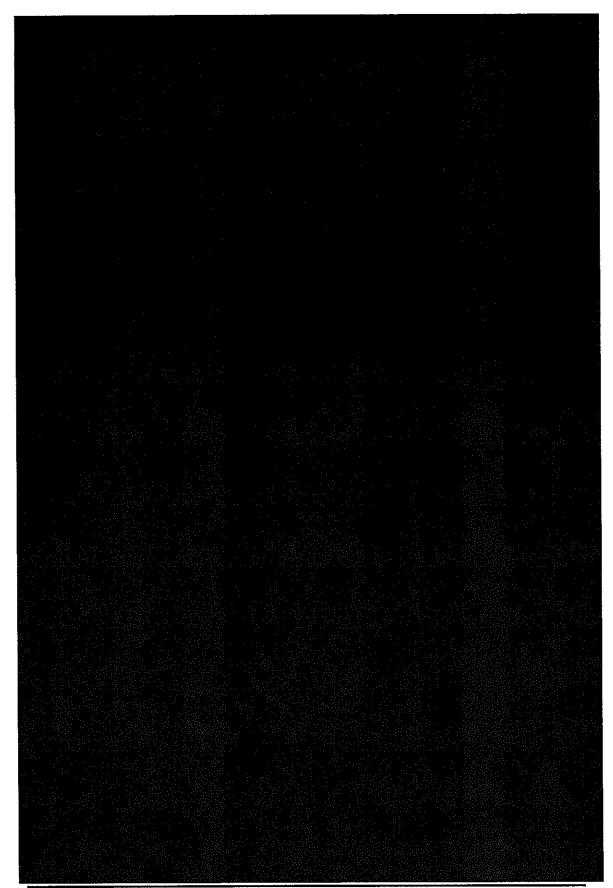
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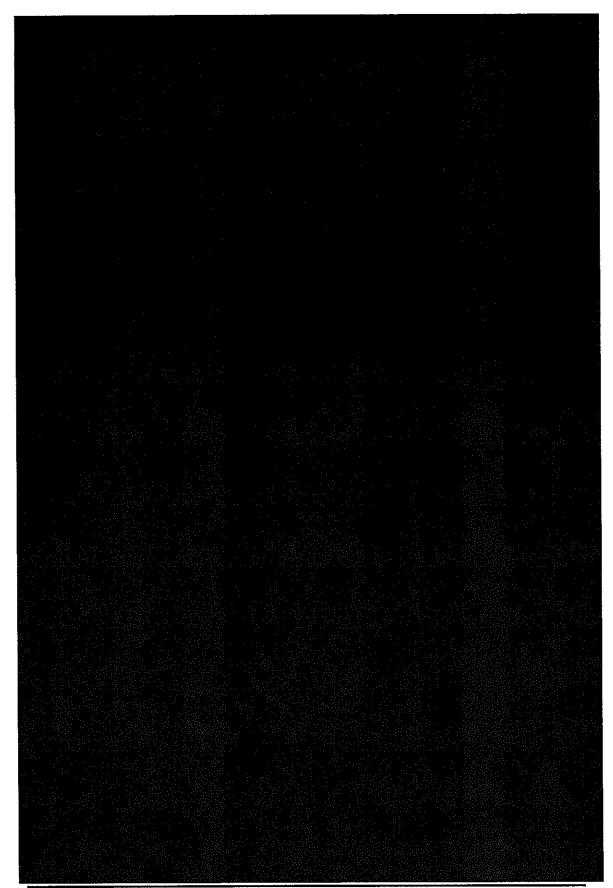
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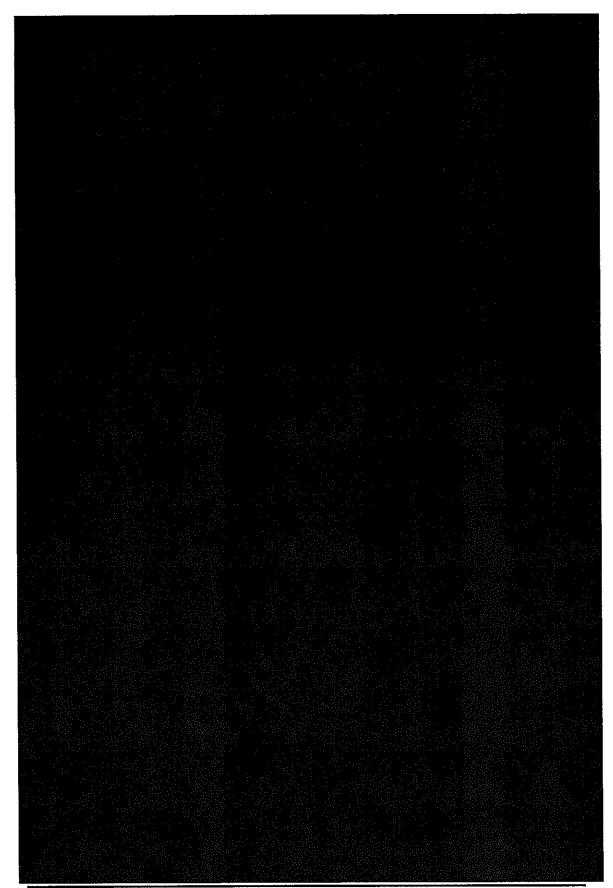
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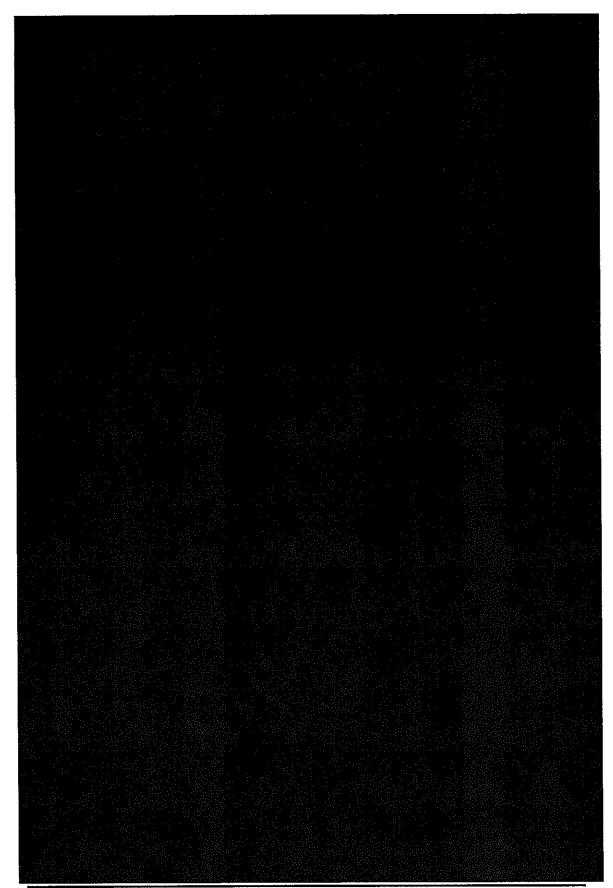
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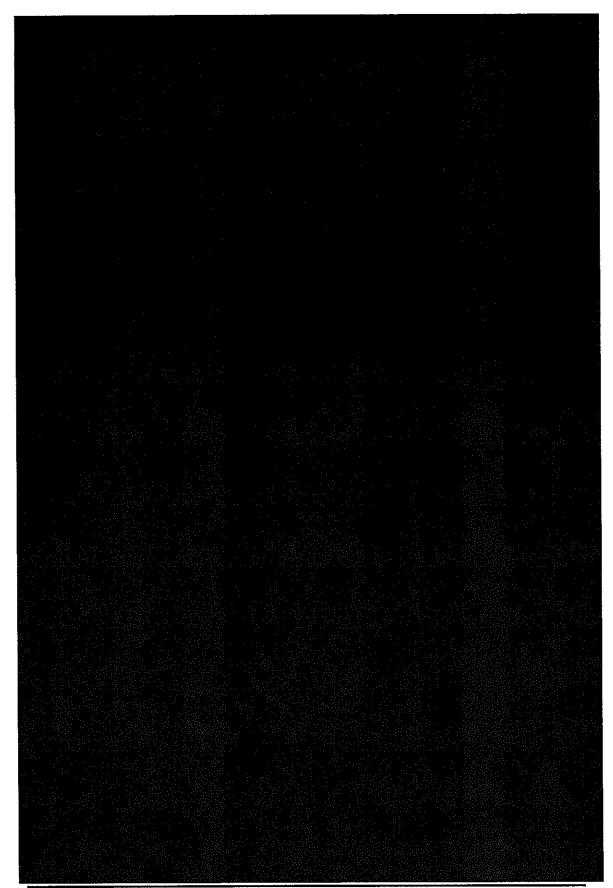
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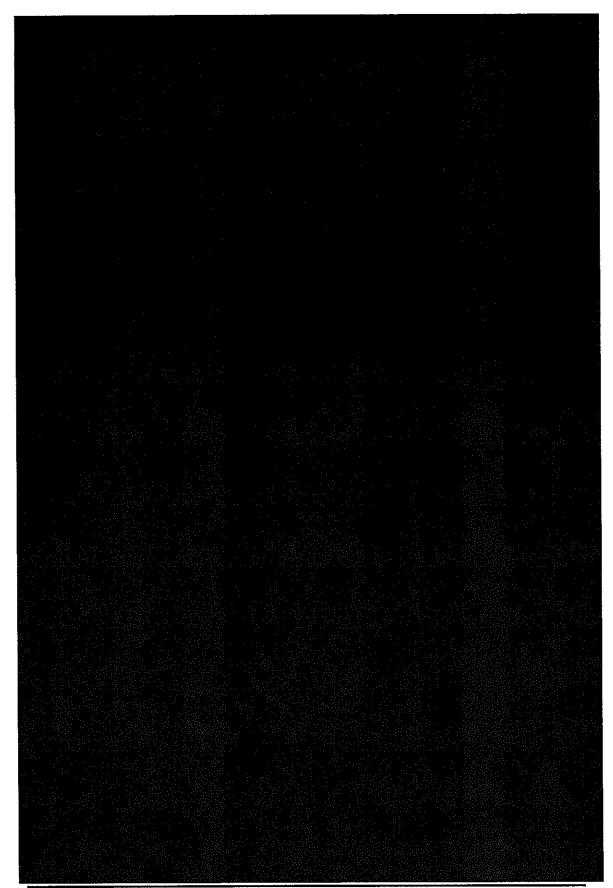
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119 D Street, NE
Washington, DC 20510



Or visit us – we are located at: 499 South Capitol Street, SW, Suite 345 Washington, DC 20003





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