



## UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

### Performance Audit of the United States Capitol Police Office of Policy and Management Systems

Report Number OIG-2018-16

September 2018

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## ***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 the draft findings 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

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## Abbreviations and Acronyms

Calendar Year	CY
Fiscal Year	FY
Management Analyst	MA
Office of Inspector General	OIG
Office of Policy and Management Systems	OPOL
Standard Operating Procedure	SOP
Subject Matter Expert	SME
United States Capitol Police	USCP or the Department

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## EXECUTIVE SUMMARY

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The United States Capitol Police (USCP or the Department) Office of Policy and Management Systems (OPOL) administers the Department's written directive system and publishes Standard Operating Procedures (SOPs). As of June 13, 2018, the Department had 167 published Directives and 621 published SOPs. The Department also had eight pieces of interim guidance awaiting final approval and publication.

In accordance with the Fiscal Year (FY) 2018 Annual Plan, the Office of Inspector General (OIG) conducted a performance audit of OPOL. The objectives of the audit were to determine if the Department (1) established adequate internal controls and processes for ensuring compliance with Department policies, and (2) complied with applicable policies and procedures, laws, regulations, and best practices. The scope of our audit included controls, processes, and operations during FY 2017 through May 2018.

The Department lacked internal controls for ensuring that rescinded and outdated Directives and SOPs were removed from PoliceNet.<sup>1</sup> As of July 23, 2018, PoliceNet contained 14 rescinded Directives or SOPs. Although it rescinded the Directives and SOPs, the Department did not review and validate PoliceNet content to ensure that outdated publications were removed. Without review and validation of PoliceNet publications, employees could have relied on outdated or incorrect information and requirements. OPOL removed outdated and rescinded material from the PoliceNet once OIG notified the Office of its presence.

USCP did not always comply with policies and procedures. For example, the Department lacked required documentation for 2 of 15 sampled new forms. Without following a consistent and repeatable process for publishing forms, the Department could prematurely publish a form without documentation of the review process.

USCP also lacked criteria for determining which SOPs should be restricted. According to a Department official, SOPs are restricted based on the judgment of the associated Bureau or Office's chain of command. In some instances, for example, access to SOP [REDACTED] dated December 31, 2010, was restricted. The SOP's stated purpose is to "clarify procedures for the Security Services Bureau (SSB) Time & Attendance (T&A) process for employees clocking in and out, and supervisory review of electronic time records." Lack of formal guidance for SOP sensitivity determination and restriction could result in policies and procedures being inappropriately or inadvertently restricted.

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<sup>1</sup> PoliceNet is the Department's intranet.

On August 14, 2018, we provided a draft report to the Department for comment. We incorporated Department comments and attached their response in its entirety in Appendix B.

## BACKGROUND

The United States Capitol Police (USCP or the Department) Office of Policy and Management Systems (OPOL) administers the Department's written directive system and publishes Standard Operating Procedures (SOPs). As of June 13, 2018, the Department had 167 published Directives and 621 published SOPs. The Department also had eight pieces of interim guidance awaiting final approval and publication. OPOL has other functions within the Department such as forms management, printing services, and strategic planning. It also manages the accreditation process for the Commission on Accreditation for Law Enforcement Agencies.

When the Department revises, rescinds, or publishes a new Directive or SOP, an employee initiates the process by completing a Form [REDACTED] and submitting it to the OPOL Management Analyst (MA). The MA reviews the Form [REDACTED] to ensure that the guidance does not duplicate another Directive or SOP and returns the form to the Subject Matter Expert (SME) with instructions regarding formatting and processing. For new or revised Directives or SOPs, the SME prepares a draft document, completes a [REDACTED], and then routes the document for approval through the chain of command. If the chain of command approves, the SME forwards the package that contains a draft of the Directive or SOP to the MA in OPOL for analysis. The MA analyzes the Directive or SOP and may contact the SME to ensure the required information is included. Upon completion of this analysis, the MA forwards documentation to an assigned OPOL employee who assists the SME with finalization and release of the guidance. When the process is complete and the appropriate chain of command has signed the [REDACTED] OPOL publishes the new Directive or SOP on PoliceNet.<sup>2</sup> See Figure 1 below for a screenshot of PoliceNet.

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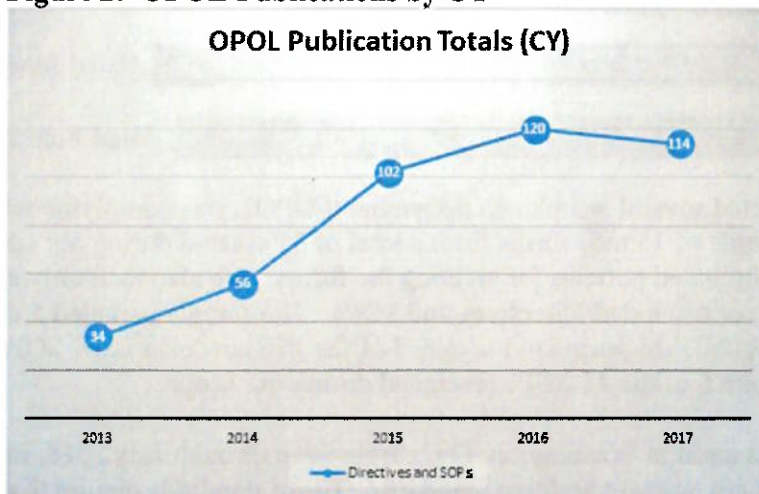
<sup>2</sup> PoliceNet is the Department's intranet.



When Directives and SOPs need rescinding, a SME completes a Form [REDACTED] with a justification noted in the “Comment” section, and attaches the Directive or SOP. Once the appropriate chain of command has signed the [REDACTED], OPOL removes the rescinded Directive or SOP from PoliceNet.

Although OPOL has experienced significant staff reductions, the number of Directives and SOPs it published each year has increased. During September 2014, OPOL had 14 staff members, and as of July 2018, the staff decreased to 9. During that same time, OPOL increased the number of publications per Calendar Year (CY) from 56 in CY 2014 to 114 in CY 2017. See Figure 2 below for a breakdown of publications by CY.

**Figure 2: OPOL Publications by CY**



Source: Provided by OPOL.

## OBJECTIVE, SCOPE, AND METHODOLOGY

In accordance with our annual plan, OIG conducted a performance audit of OPOL. The objectives of this audit were to determine if the Department (1) established adequate internal controls and processes for ensuring compliance with Department policies, and (2) complied with applicable policies and procedures, as well as, applicable laws, regulations, and best practices. The scope of our audit included controls, processes, and operations during Fiscal Year (FY) 2017 through May 2018.

To accomplish our objectives, we interviewed a Department official to gain an understanding of the following areas:

- Number and type of Directives and SOPs
- The organizational structure of OPOL
- Number of OPOL publications per year
- Process for restricting USCP SOPs

To determine compliance, we reviewed the following USCP guidance:

- Directive [REDACTED], dated May 30, 2018
- SOP [REDACTED], dated November 18, 2015
- SOP [REDACTED], dated November 13, 2015
- SOP [REDACTED], dated August 14, 2015
- SOP [REDACTED], dated June 6, 2014
- SOP [REDACTED], dated June 22, 2009

We randomly selected several samples to determine if OPOL was complying with its policies. We reviewed a sample of 15 new forms from a total of 31 created during our scope to determine if the Department followed policies for creating the forms. We also randomly selected a sample of 15 new, revised, or rescinded Directives and SOPs. The sample included 5 of the 43 new or revised Directives published during our scope, 5 of the 156 new or revised SOPs published during our scope, and 5 of the 41 SOPs rescinded during our scope.

OIG conducted this audit in Washington, D.C., from June through July 2018, in accordance with generally accepted government auditing standards. Those standards require that we plan and

perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. On August 14, 2018, we provided a draft copy of this report to Department officials for comment. On September 13, 2018 we conducted an exit conference. We incorporated Department comments as applicable and attached its response to the report in its entirety as Appendix B. This report is intended solely for the information and use of the Department, the USCP Board, and USCP Oversight Committees and should not be used by anyone other than the specified parties.

## RESULTS

Overall, the Department lacked internal controls that would ensure rescinded policies and procedures did not appear on PoliceNet. USCP also did not always comply with its policies regarding required documentation for new forms. Finally, USCP lacked criteria for determining which SOPs should be restricted.

### Inadequate Controls

#### Rescinded Policies and Procedures Still Located on PoliceNet

The Department did not consistently remove rescinded Directives and SOPs from PoliceNet. SOP [REDACTED] states, "OPOL employees are responsible for maintaining files for all Directives and SOPs, as well as distributing and publishing approved Directives and SOPs on the USCP's intranet, *PoliceNet*."

During our review, PoliceNet contained 14 rescinded Directives or SOPs. Although it had rescinded the Directives and SOPs, the Department did not have a control in place that would ensure outdated publications were removed from PoliceNet. Without such a control, employees may have relied on incorrect or outdated requirements. Upon notification by OIG of rescinded Directives and SOPs still on PoliceNet, OPOL removed the publications.

### Conclusions

The Department lacked internal controls for ensuring that rescinded policies and procedures did not still appear on PoliceNet. Weaknesses in internal controls related to policies and procedures could lead to employees relying on incorrect and outdated guidance. We, therefore, make the following recommendation:

**Recommendation 1:** We recommend that the United States Capitol Police establish a control requiring periodic reviews of all Directives and Standard Operating Procedures published on PoliceNet to ensure the site does not include outdated publications.

## Noncompliance with Policies and Procedures

### Lack of Required Documentation

The Department was publishing forms without maintaining the required documentation. SOP [REDACTED] requires that employees completing a draft form should prepare a [REDACTED] and forward it with the draft form through the chain of command. When approved, the Bureau Commander/Office Director signs the [REDACTED] and forwards the package to OPOL for completion. Of the 15 new forms reviewed, 2 did not have the required [REDACTED].

Without the proper use and maintenance of required documentation for new forms, controls may be bypassed, which may allow incomplete or inadequate review of new forms.

### Conclusion

The Department did not consistently follow their policies related to new forms. Without following a consistent and repeatable process for publishing forms, the Department could prematurely publish a form without documentation of the review process. We, therefore, make the following recommendation.

**Recommendation 2:** We recommend that the United States Capitol Police enforce Standard Operating Procedures [REDACTED], dated November 18, 2015.

### Other Matter

#### Lack of Criteria for Restricting Standard Operating Procedures

USCP lacked criteria for determining which SOPs should be restricted. The Government Accountability Office's *Standards for Internal Control in the Federal Government*, dated September 2014, states, "Management limits access to resources and records to authorized individuals, and assigns and maintains accountability for their custody and use. Management may periodically compare resources with the recorded accountability to help reduce the risk of errors, fraud, misuse, or unauthorized alteration."

According to a Department official, SOPs are restricted based on the judgment of the associated Bureau or Office's chain of command. Access to some SOPs was restricted, but seemingly without an apparent need. For example, access to SOP [REDACTED] dated December 31, 2010, was restricted (see Figure 3). The SOP's stated purpose is to "clarify procedures for the Security Services Bureau (SSB) Time & Attendance (T&A) process for employees clocking in and out, and supervisory review of electronic time records." Lack of formal guidance for SOP sensitivity determination and

restriction may result in policies and procedures being inappropriately restricted or inadvertently restricted.

**Figure 3: Example of a Restricted Standard Operating Procedure**



Source: OIG captured from PoliceNet.

## **Conclusion**

The Department lacked criteria for determining which SOPs should be restricted. Without proper criteria for restricting SOPs, some SOPs may be unnecessarily restricted while the Department may not restrict sensitive SOPs. We, therefore, make the following recommendation.

**Recommendation 3:** We recommend that the United States Capitol Police create formal guidance for determining the sensitivity and restrictions for Standard Operating Procedures.

# APPENDICES


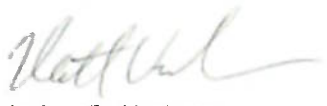

## *List of Recommendations*

**Recommendation 1:** We recommend that the United States Capitol Police establish a control requiring periodic reviews of all Directives and Standard Operating Procedures published on PoliceNet to ensure the site does not include outdated publications.

**Recommendation 2:** We recommend that the United States Capitol Police enforce Standard Operating Procedures [REDACTED], dated November 18, 2015.

**Recommendation 3:** We recommend that the United States Capitol Police create formal guidance for determining the sensitivity and restrictions for Standard Operating Procedures.

## DEPARTMENT COMMENTS

	<b>UNITED STATES CAPITOL POLICE</b>	Phone: 202-224-9888
	OFFICE OF THE CHIEF 119 D STREET, NE WASHINGTON, DC 20540-7218 August 23, 2018	
		COP 180777
<b>MEMORANDUM</b>		
<b>TO:</b>	Mr. Michael A. Bolton Acting Inspector General	
<b>FROM:</b>	Matthew R. Verderosa Chief of Police	
<b>SUBJECT:</b>	Response to Office of Inspector General draft report <i>Performance Audit of the United States Capitol Police Office of Policy and Management Systems</i> (Report No. OIG-2018-16)	
<p>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 <i>Performance Audit of the United States Capitol Police Office of Policy and Management Systems</i> (Report No. OIG-2018-16)</p> <p>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 within the Department. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect to achieve long term resolution of these matters.</p> <p>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.</p> <p>Very respectfully,</p> <p> Matthew R. Verderosa Chief of Police</p> <p>cc: Steven A. Sund, Assistant Chief of Police Richard L. Braddock, Chief Administrative Officer  /SCP Audit Liaison</p> <p>Nationally Accredited by the Commission on Accreditation for Law Enforcement Agencies, Inc.</p>		

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