



UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

Analysis of the United States Capitol Police Recruiting Program

Report Number OIG-2019-09

August 2019

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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.

A handwritten signature in black ink, appearing to read "M. A. Bolton", is positioned above the printed name.

Michael A. Bolton
Inspector General

TABLE OF CONTENTS

Abbreviations and Acronyms	iii
Executive Summary	1
Background	1
Objectives, Scope, and Methodology	5
Results	6
Outdated Policies and Procedures	6
Lack of Internal Control to Track Applicants to Recruiting Source	7
Appendices	8
Appendix A – List of Recommendations	9
Appendix B – Department Comments	10

Abbreviations and Acronyms

Chief Administrative Officer	CAO
Fiscal Year	FY
Government Accountability Office	GAO
Office of Background Investigations and Credentialing	OBIC
Office of Human Resources	OHR
Office of Inspector General	OIG
Peace Officer Background Investigation Tracking System	POBITS
Physical Readiness Test	PRT
Police Officer Selection Test	POST
Standard Operating Procedure	SOP
United States Capitol Police	USCP or the Department

EXECUTIVE SUMMARY

In accordance with our *Annual Performance Plan Fiscal Year 2019*, the Office of Inspector General (OIG) conducted an analysis of the United States Capitol Police (USCP or the Department) recruiting program. OIG objectives were to determine if the Department (1) established adequate policies and procedures for its recruiting program, (2) established effective controls to ensure the integrity of the recruiting program, and (3) complied with applicable laws, regulations, and guidance. Our scope included controls, processes, and operations during Fiscal Year (FY) 2018.

The Office of Background Investigations and Credentialing (OBIC) was created on January 1, 2018, and is responsible for the recruiting of sworn personnel at USCP. Prior to creation of OBIC, the Office of Human Resources (OHR) was responsible for the recruiting of sworn personnel. The resultant change in organizational structure contributed to the Department's lack of up-to-date policies related to the recruiting of sworn personnel. Standard Operating Procedure (SOP) [REDACTED], dated July 25, 2001, and SOP [REDACTED], dated August 3, 2001, were not up to date. For example, procedures in SOP [REDACTED] include documentation maintenance of five forms that are no longer in use and outdated practices such as keeping pertinent information related to inactive files on microfilm. Procedures in SOP [REDACTED] also include outdated practices such as acknowledgment of all applicants in writing within 15 working days of the receipt of the application, and making announcement of recruiting activities by way of print media.

USCP did not have controls in place that would help identify, collect, process, and use qualitative information from preliminary steps of recruiting to the point of approval for hire. USCP also did not track potential applicants identified during recruiting job fairs and new hires to a specific recruiting job fair conducted during FY 2018. Additionally, USCP did not collect specific performance data that measured the outcome of the various types of recruiting efforts. Because they did not collect and report the names of interested candidates seen during recruiting events, recruiters could not follow-up and/or track potential candidates through the assessment and hiring process.

OIG made two recommendations as shown in Appendix A. On July 16, 2019, we provided a draft report to the Department for comment. We incorporated the Department's comments and attached their response in its entirety in Appendix B.

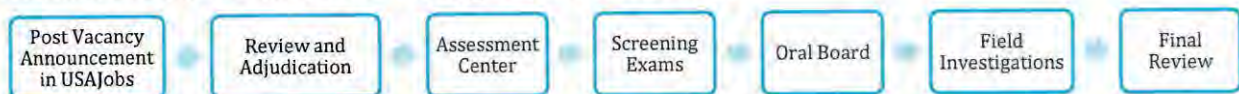
BACKGROUND

The Office of Background Investigations and Credentialing (OBIC) is responsible for recruiting sworn officers. OBIC's other responsibilities include badging and credentialing of the United

States Capitol Police (USCP or Department) employees and contractors and conducting and adjudicating criminal background investigations for USCP contractors and other legislative branch entities.

On January 1, 2018, the Department officially launched a new organizational structure. The new organizational structure established OBIC, formerly the Credentialing and Background Investigation Division in the Office of Human Resources (OHR). The reorganization moved the recruiting of sworn personnel from OHR to OBIC, which reports directly to the Chief Administrative Officer (CAO). Exhibit 1 illustrates the process of recruiting sworn personnel.

Exhibit 1: Process for the Recruiting of Sworn Personnel



Source: Prepared by OIG based on information provided by OBIC.

Recruitment for sworn personnel begins with USCP posting a police officer vacancy announcement on USAJobs.¹ According to OBIC, review and adjudication of applicants starts shortly after the applicant applies. OHR performs limited adjudication based on information submitted to USAJobs. Adjudicators further pre-screen applicants based on a personal history statement and credit, criminal, and driving record checks. Information gained during the pre-screening may disqualify candidates. Qualifying candidates are invited to the Assessment Center to attend orientation and take the Police Officer Selection Test (POST), Physical Readiness Test (PRT), and go through a pre-hire background interview. Candidates who pass the POST, PRT, and pre-hire interview receive a *Conditional Offer of Employment* letter; OBIC staff and the candidate sign the letter.

Candidates then undergo screening examinations, also referred to as the “Gauntlet,”² which consists of a polygraph examination, a medical examination, and a psychological evaluation. Candidates who successfully pass the screening examinations move on to the oral boards and field investigations. USCP was operating under a “just-in-time” recruiting method, meaning that it generally recruits candidates just-in-time to fill upcoming classes. Due to just-in-time recruiting and because USCP attempts to expedite the recruiting steps for out-of-town applicants, the sequence of screening examinations may happen differently from one candidate to another. Additionally, for some candidates the oral board occurs before a candidate has fully finished the screening exams.

The candidate’s official case jacket—a physical binder of documents—contains documentation obtained throughout the hiring process. Upon successful completion of the “Gauntlet”, favorable

¹ USAJobs is the Federal Government’s official employment site. Federal agencies use USAJobs to facilitate the hiring process and match qualified applicants to job openings. USAJobs serves as the central location to find job openings within hundreds of Federal agencies and organizations.

² According to the Department’s website, “The Gauntlet Phase of the USCP Police Officer hiring process consists of a polygraph, medical, and psychological examinations.” See <https://www.uscp.gov/police-officer-selection-process>.

field investigation, and results of an oral board, a final review and approval of the official case jacket is performed by OBIC, sworn personnel (Captain or above), and the CAO. OBIC delivers the official case jacket to OHR, who sends the candidate an official notification for hire and provides further instructions regarding the start date.

During Fiscal Year (FY) 2018, 13,672 applicants applied to USCP police officer vacancy announcements in USAJobs. After review and adjudication of the 13,672 applicants, 4,236 (or 31 percent) failed to meet the minimum qualifications in USAJobs. After review and adjudication of the remaining 9,436 applicants in the Peace Officer Background Investigation Tracking System (POBITS),³ 7,472 (or 79 percent) did not move forward because of information obtained from their personal history statements and credit, criminal, and driving record checks or they failed to complete requirements in POBITS. The remaining 1,964 applicants received invitations to attend the Assessment Center. Of the 1,964 applicants, 823 (or 42 percent) did not attend the Assessment Center and 580 (or 30 percent) failed the Assessment Center. Of the remaining 561 applicants, 315 (or 56 percent) failed the screening examination or oral board. Of the remaining 246 applicants, 71 (or 29 percent) did not move forward based on information obtained during the field investigation. The remaining 175 applicants (or 1.28 percent of the 13,672 applicants) were approved for hire in FY 2018, and 172 (or 1.25 percent) of the 13,672 applicants were hired. Table 1 shows the breakdown of the FY 2018 failure rate by recruiting step.

Table 1: FY 2018 Fail Rate by Recruiting Step

Recruiting Steps	Failed at Each Step	Remaining at Each Step	Failure Rate at Each Step
Vacancy Announcement in USAJobs	N/A	13,672	N/A
Review and Adjudication in USAJobs	4,236	9,436	31%
Review and Adjudication in POBITS	7,472	1,964	79%
Assessment Center – Did not attend	823	1,141	42%
Assessment Center – Failed	580	561	30%
Screening Exams (or Gauntlet)	315	246	56%
Oral Board ⁴			
Field Investigation	71	175	29%
Final Review	-	175	0%
Recruits Hired	3 ⁵	172	2%

Source: Table prepared by OIG based on FY 2018 data provided by OBIC.

According to documentation the Department provided and OIG estimates, the recruiting cost for FY 2018 totaled approximately \$3,453,732 or \$20,080 per recruit hired during FY 2018. Table 2 shows the breakdown of the cost at each step of the process.

³ POBITS is a web-based application the Department uses for conducting background investigations during the hiring process.

⁴ During FY 2018, 467 applicants attended an oral board and 21 (4.5 percent) failed the oral board phase.

⁵ USCP approved these recruits for hire, but the candidates did not accept offers, so they were not hired.

Table 2: FY 2018 Recruiting Cost Breakdown

Recruiting Steps	Estimated Costs
Recruiting Efforts	\$256,240
USAJobs	\$101,350
Review and Adjudication	\$920,457
Assessment Center	\$271,013
Screening Exams (or Gauntlet)	\$795,219
Oral Board	\$102,592
Field Investigations	\$953,667
Final Review	\$53,193
Total	\$3,453,732

Source: Costs calculated by OIG based on FY 2018 recruiting costs and employee hours provided by OBIC.
Amounts rounded to the nearest dollar. Difference in total due to rounding.

Additional costs in FY 2018 related to the Recruitment Program, but not part of the recruiting process, included services Global Consortium, LLC (GCL) provided to develop a recruiting strategic plan, totaling \$160,000.

Documentation OBIC provided stated that it took roughly 3 to 5 months to hire a candidate that applied to a posting on USAJobs. See Table 3 below.

Table 3: Recruiting Process Timeline

Step	Timeframe
USAJobs Posting Open Period	30 days
Candidate Completing POBITS Questionnaire	14 days
Adjudication	28 days
Invitation to Assessment Center	30 days
Assessment Center	2 days
Screening Exams	2 days
Screening Exam Reporting Period	15 days
Oral Board	1 day
Field Investigation	15 days
Review Process	10 days

Source: OIG generated from information provided by OBIC.

OBIC uses various contractors to assist with recruiting sworn personnel. During FY 2018, contractors from SAVA and AvantGarde provided services such as investigating, adjudicating, and processing candidates at the Assessment Center. Additionally, contractors from the Colonial Polygraph Services, Inova Health Systems, and GCL provided services of conducting polygraph examinations, medical examinations, and psychological evaluations, respectively.

OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with our *Annual Performance Plan Fiscal Year 2019*, the Office of Inspector General (OIG) conducted an analysis of the USCP recruiting program. OIG objectives were to determine if the Department (1) established adequate policies and procedures for the recruiting program, (2) established effective controls to ensure the integrity of the recruiting program, and (3) complied with applicable laws, regulations, and guidance. Our scope included controls, processes, and operations during FY 2018.

To accomplish our objectives, we interviewed officials from OBIC, the Office of Administration, the Office of Acquisitions Management, and reviewed documentation to gain an understanding of the process in the following areas:

- Recruiting strategies at USCP
- Costs related to each step in the recruiting process
- Contractor support in the recruiting process

To determine compliance, we reviewed the following guidance, consisting of USCP Directives, Standard Operating Procedures (SOPs), USCP Bulletins and policies, and industry standards:

- U.S. Government Accountability Office (GAO), *Standards for Internal Control in the Federal Government*, dated September 2014.
- USCP SOP [REDACTED], dated August 3, 2001.
- USCP SOP [REDACTED], dated July 25, 2001.

Because SOPs related to sworn recruiting were significantly outdated, OIG performed a limited review of those SOPs but did not perform significant testing.

OIG conducted this analysis in Washington, D.C., from December 2018 through June 2019. 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 analysis 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 July 16, 2019, we provided a draft copy of this report to Department officials for comment. See Appendix A for a complete list of OIG recommendations. OIG incorporated Department comments as applicable and attached their response to the report in its entirety as Appendix B.

RESULTS

Overall, USCP did not have up-to-date policies and procedures related to the recruiting of sworn personnel. In addition, the Department did not have controls in place that could identify, collect, process, and use qualitative information from preliminary steps of recruiting to the point of approval for hire.

Outdated Policies and Procedures

USCP SOPs related to the recruiting of sworn personnel were not up to date. GAO *Standards for Internal Control in the Federal Government*, dated September 2014, state, "Management periodically reviews policies, procedures, and related control activities for continued relevance and effectiveness in achieving the entity's objectives or addressing related risks." USCP had not updated SOP [REDACTED] and SOP [REDACTED] since 2001. The Sworn Officer Recruiting Section distributed both SOPs, and that office is no longer part of the USCP organizational structure. Procedures in SOP [REDACTED] included documentation maintenance of five forms no longer in use, and outdated practices such as keeping pertinent information related to inactive files on microfilm. Procedures in SOP [REDACTED] included outdated practices such as acknowledgment of all applicants in writing within 15 working days of receipt, and making announcement of recruiting activities by way of print media.

Additionally, during 2018, the Department created collateral recruiting officer positions and in 2019 selected personnel to fill those positions. The selected personnel received training in February 2019, and have subsequently begun engaging in active recruiting efforts for the Department. However, SOPs [REDACTED] and [REDACTED] do not address active recruiting efforts or the role of a collateral recruiting officer.

In 2017, USCP drafted the SOP [REDACTED] to replace the outdated policies from 2001. The draft has been under review since 2017 and at the time of our review, the organizational structure has changed and the draft now contains outdated references.

Conclusions

The Department had not updated its policies and procedures related to recruiting of sworn personnel since 2001. Failure to keep policies and procedures up to date resulted in SOPs that referred to obsolete offices, forms no longer in use, and outdated practices. Thus, OIG makes the following recommendation.

Recommendation 1: We recommend the United States Capitol Police update their policies and procedures concerning recruitment of police officers to reflect prevailing processes from announcement of vacancy to approval for hire.

Additionally, the policies and procedures should address active recruiting efforts and the role of a collateral recruiting officer.

Lack of Internal Control to Track Applicants to Recruiting Source

USCP did not track potential applicants identified during recruiting job fairs and new hires back to specific recruiting job fairs conducted during FY 2018. Recruiters did not collect specific performance data that would measure the outcome of different types of recruiting efforts. GAO *Standards for Internal Control in the Federal Government*, dated September 2014, states that management obtains relevant data from reliable internal and external sources in a timely manner based on the identified information requirements, processes it into quality information that supports the internal control system, and should internally communicate the necessary quality information to achieve the entity's objectives.

During FY 2018, USCP attended 42 career fairs and spent \$256,239 on active recruiting efforts. Management did not, however, have controls in place that could identify, collect, process, and use qualitative information from preliminary steps of recruiting to the point of approval for hire. Without qualitative data, USCP cannot determine if its active recruiting efforts yielded desired results. Without collecting and reporting the names of interested candidates that the Department met with during recruiting events, recruiters were unable to follow-up and/or potentially track potential candidates through the assessment and hiring process.

Conclusions

The Department lacked an internal control to collect any performance data and track applicants to their recruiting sources. Thus, OIG makes the following recommendation.

Recommendation 2: We recommend the United States Capitol Police implement a process to obtain qualitative data, process the data into quality information for use in developing effective recruiting strategies, and evaluate performance of specific recruiting program activities.

APPENDICES

List of Recommendations

Recommendation 1: We recommend the United States Capitol Police update their policies and procedures concerning recruitment of police officers to reflect prevailing processes from announcement of vacancy to approval for hire. Additionally, the policies and procedures should address active recruiting efforts and the role of a collateral recruiting officer.

Recommendation 2: We recommend the United States Capitol Police implement a process to obtain qualitative data, process the data into quality information for use in developing effective recruiting strategies, and evaluate performance of specific recruiting program activities.

DEPARTMENT COMMENTS



UNITED STATES CAPITOL POLICE

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

July 29, 2019

COP 190567

MEMORANDUM

TO: Michael A. Bolton
Inspector General

FROM: Steven A. Sund
Chief of Police

SUBJECT: Response to Office of Inspector General draft report *Analysis of the United States Capitol Police Recruiting Program* (Report No. OIG-2019-09)

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 *Analysis of the United States Capitol Police Recruiting Program* (Report No. OIG-2019-09).

The Department generally agrees with all of the recommendations and appreciates the opportunity to work with the OIG to further improve upon the policies and procedures in place for the Recruiting Program. The Department will assign Action Plans to appropriate personnel regarding each recommendation in effect in order 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,


Steven A. Sund
Chief of Police

cc: Chad B. Thomas, Acting Assistant Chief of Police
Richard L. Braddock, Chief Administrative Officer
[REDACTED], USCP Audit Liaison

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