



Analysis of Outdated Standard Operating Procedures and Directives

Report Number: OIG-2023-05

April 2023

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At a Glance:

Since inception, the Office of Inspector General (OIG) has made many recommendations related to the revision or implementation of policies and procedures. In response, the United States Capitol Police (USCP or the Department) has made substantial progress addressing these recommendations.

However, more frequent reviews of Standard Operating Procedures (SOPs) and Directives should be conducted. OIG noted during its review that several policies and procedures had not been updated for a number of years. As a result, the Department had SOPs and Directives referring to outdated information including references to bureaus and divisions that have been renamed or restructured, technology that is no longer in common use, and a command title that is no longer current.

Background:

The Department maintains policies and procedures that provide guidance to employees for the performance of their duties. Those policies and procedures are categorized as either an SOP or a Directive. SOPs are policies that are specific to a particular bureau or division, whereas directives are department-wide guidance. As of December 31, 2022, the Department had 599 SOPs and 186 Directives in effect.

The Office of Policy and Management Systems (OPOL) is responsible for maintaining files for Directives and SOPs, as well as distributing and publishing approved Directives and SOPs on PoliceNet.

OPOL staff are also responsible for the USCP written directive system—policies and SOPs. The system is a repository housing official Directives, SOPs, and/or other Department policy publications issued by the Chief of Police, or the Chief's designee, with which employees must comply or enforce. When new policies are developed or existing policies are edited, they are submitted to the USCP written directive system. The OPOL process to update SOPs and Directives includes circulating a weekly SOP and Directives progress report Department-wide. This reflects over 100 SOPs and Directives that are currently being updated. In addition, OPOL notifies all offices and bureaus of SOPs and Directives that need to be revised. Finally, OPOL is in the process of updating Directive 2011.001, Written Directive System, which requires annual review of SOPs and Directives.

OIG has issued many reports recommending that the Department review and update policies and procedures. As of March 16, 2023, OIG made a total of 645 recommendations since its inception, and of those recommendations, 214 were related to the revision or implementation of policies and procedures. The Department has made substantial progress addressing the recommendations with 92 percent being satisfactorily closed. While many of the recommendations have been closed, there are 12 open recommendations related to the creation or implementation of a new policy or procedure and 6 open recommendations related to the revision or update of existing policies and procedures.

Results:

The Department did not have an effective process in place for ensuring its SOPs and Directives are regularly reviewed and updated. Many USCP policies and procedures had not been updated for many years.

As of December 31, 2022, the Department had 163 SOPs and 49 Directives with an effective date that was greater than 10 years prior to December 31, 2022. Included in that count, 24 SOPs had an effective date of more than 15 years, with 1 Directive noting, "Per Attached Policies." The effective date of the referenced policies was June 6, 1991.

Such a lack of review resulted in Department SOPs and Directives referring to out-of-date or superseded information, as well as references to bureaus and divisions that no longer exist, technology that is no longer in common use, an accreditation that is no longer held, and a title that is no longer current.

In 2018 the Department underwent a reorganization that renamed or consolidated several organizations. The reorganization resulted in the following organizational changes: the Mission Assurance Bureau (MAB) was renamed to the Command and Coordination Bureau (CCB) and several MAB-related divisions were renamed including the Operations Division, which was renamed to the Command Division (CMD), the Emergency Management Division (EMD), and the Special Events Division were consolidated and renamed to the Coordination Division. The Office of Information Systems Programs and Analysis Division was renamed the Enterprise Applications and Management Division, the Office of Human Resources, Programs Division was renamed to the Workforce

Relations Division, and the Office of Facilities and Logistics Vehicle Maintenance Division (VMD) was renamed to the Vehicle Management Division. The following organizations were removed from the organization chart: the Office of Employment Counsel whose functions are now a division of the Office of the General Counsel, and the Construction Security Division whose functions now reside in the Construction Security Division of the Physical Security Division of the Security Services Bureau. The Department has many policies that refer to those outdated organizations and include 93 SOPs and 6 Directives.

Additionally, USCP also has several SOPs and Directives that refer to the Patrol Mobile Response Division (PMRD). That division was renamed to the Special Operations Division as part of a restructuring that was effective October 20, 2019. The Department had 68 SOPs and 9 Directives referencing that division.

Furthermore, the Department policies also referencing a title no longer used by the Department. USCP policies reference the Chief of Operations (COO). That title was in use when the Department had only one assistant chief. The change from one Assistant Chief who held the title of COO to an organizational structure with two Assistants Chiefs was made as part of the October 2019 restructuring. The current structure includes the Office of the Assistant Chief of Police for Protective and Intelligence Operations and the Office of the Assistant Chief of Police for Uniformed Operations. The Department confirmed that the title of COO is no longer used by USCP, and one of the two Assistant Chiefs of Police now fills this role for each corresponding office; however, 71 SOPs and 21 Directives include the use of the title.

Those policies contain critical duties that include oversight of necessary functions that are performed by the COO. Without clarification as to which Assistant Chief should fill this role, critical duties may not be performed.

Finally, USCP had policies referencing accreditation no longer current, technology no longer in use, and an employment status that is outdated. The Department was previously accredited by the Commission on Accreditation for Law Enforcement Agencies (CALEA). The Department recently transitioned to the Federal Law Enforcement Training Accreditation and should, therefore, update the 8 SOPs and 5 Directives referencing CALEA. In addition, the Department had 10 SOPs and 6 Directives that refer to the use of outdated devices such as Blackberries, palm pilots, or adding machines, and one USCP Directive referencing USCP officers identified as House or Senate employees, a practice that was changed by the appropriation bill of Fiscal Year 2003.

The Department did not have an effective process in place for regularly reviewing and updating SOPs and Directives. Outdated policies and procedures can increase process inefficiencies, create ambiguity, and impede the effectiveness of the Department. The use of outdated structures can also cause confusion with new employees who are not familiar with the past structure.

Recommendation 1: We recommend that the United States Capitol Police establish an effective process for regularly reviewing Standard Operating Procedures and Directives for outdated information and update these policies with accurate information.

Conclusion:

Based on our review of Department policies and procedures, best practices, and applicable guidance, OIG found that the Department should more frequently review and update its SOPs and Directives to ensure they accurately reflect current operations.

APPENDICES

Objectives, Scope, and Methodology

In accordance with our *Annual Performance Plan Fiscal Year 2023*, dated November 2022, the Office of Inspector General (OIG) conducted an analysis of the United States Capitol Police's (USCP) outdated Standard Operating Procedures (SOPs) and Directives. Our scope included policies and procedures in effect as of December 31, 2022. OIG objectives for the analysis of USCP's policies and procedures were to (1) determine which policies and procedures were in place as of December 31, 2022, and (2) determine if any policies or procedures were outdated.

To determine applicable policies and procedures, we researched the Department's website and PoliceNet for applicable guidance and training. To determine compliance with USCP requirements, we reviewed USCP directives and SOPs. Additionally, we reviewed prior work performed by the OIG related to policies and procedures.

We conducted this review in Washington, D.C., from January through March 2023. We did not conduct an audit, the objective of which would be the expression of an opinion on Department programs. Accordingly, we did not express such an opinion. OIG did not conduct this review 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.

Recommendations

Recommendation 1: We recommend that the United States Capitol Police establish an effective process for regularly reviewing Standard Operating Procedures and Directives for outdated information and update any policies with accurate information.

Department Comments



UNITED STATES CAPITOL POLICE

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

April 12, 2023

PHONE: 202-224-9806

COP 230605

MEMORANDUM

TO: Ronald P. Russo
Inspector General

FROM: J. Thomas Manger
Chief of Police

SUBJECT: Response to Office of Inspector General draft report *Analysis of Outdated Standard Operating Procedures and Directives* (Report No. OIG-2023-05)

The purpose of this memorandum is to provide the United States Capitol Police response to the recommendation contained within the Office of Inspector General's (OIG) draft report *Analysis of Outdated Standard Operating Procedures and Directives* (Report No. 2023-05).

The Department generally agrees with the recommendation and appreciates the opportunity to work with the OIG to further improve upon the policies and procedures in place for the Office of Policy and Management Systems. The Department will assign Action Plans to appropriate personnel to address and remediate this recommendation.

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,


J. Thomas Manger
Chief of Police

cc: Jason R. Bell, Acting Assistant Chief for Protective & Intelligence Operations
Sean P. Gallagher, Acting Assistant Chief of Police for Uniformed Operations
Magdalena Boynton, Acting Chief Administrative Officer
[REDACTED] Program Manager / Audit Liaison

