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# UNITED STATES CAPITOL POLICE OFFICE OF INSPECTOR GENERAL

# Audit of United States Capitol Police Workforce Diversity

Report Number OIG-2008-05 July 2008

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## UNITED STATES CAPITOL POLICE WASHINGTON, DC 20003



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 audit, reviews, and investigative and special reports prepared by OIG periodically as part of its oversight responsibility with the respect to the United States Capitol Police 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. It is based on interviews with employees and officials of relevant agencies and institutions, direct observation, and a review of applicable documents.

The recommendations therein have been developed on the basis of the best knowledge available to the OIG, and have been discussed in draft with those responsible for implementation. It is my hope that these recommendations will result in more effective, efficient, and/or economical operations.

I express my appreciation to all of those who contributed to the preparation of this report.

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# **Abbreviations**

Capitol Police Board	Board
Civilian Labor Workforce	CLF
Congressional Accountability Act	CAA
Equal Employment Office	EEO
Equal Employment Opportunity Commission	EEOC
Federal Workforce	FW
Fiscal Year	FY
General Counsel	GC
Internal Affairs Division	IAD
National Finance Center	NFC
Office of Compliance	ooc
Office of the Employment Counsel	OEC
Office of the General Counsel	OGC
Office of Human Resources	OHR
Office of Inspector General	OIG
Office of Professional Responsibility	OPR
Training Services Bureau	TSB
United States Capitol Police	USCP or Department

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#### **Executive Summary**

At the request of the Chairman, Subcommittee on Federal Workforce, Postal Service, and the District of Columbia; Committee on Oversight and Government Reform; House of Representatives; the Office of Inspector General (OIG) conducted an audit of the United States Capitol Police's (USCP or Department) diversity program. Our objectives were to (1) identify and assess the diversity program(s) within the Department to determine if the program is yielding the desired results--creating a more diverse population of women and minorities in top leadership positions (Senior Level and GS-15, or equivalent); (2) evaluate the accuracy and completeness of complaints and discrimination data being reported to Congress; and (3) assess to what degree the diversity office is independent of the Department's General Counsel and the agency head.

As of January 2008, USCP did not have a formal diversity program or an Equal Employment Office (EEO) program function. However, USCP diversity initiatives, such as nationwide recruitment and developmental programs, have generally increased representation of women and minorities<sup>1</sup> in its senior level positions<sup>2</sup> and developmental pool<sup>3</sup> for potential successors between 2002 and 2007. Overall, the number of senior level positions has increased from 18 to 21 between 2002 and 2007. Within that total, the representation of women increased from 16.7 percent for 2002 to 28.6 percent for 2007, whereas the representation of minorities decreased. However, as of May 12, 2008, we noted that minority representation in senior level positions had increased to 22.7 percent. For the developmental pool, FY 2007 data show that increases also occurred among women and minorities since 2002 as shown in Table 1.

		002		20	07			
	Women		Minorities		Women		Minorities	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Senior Level	3	16.7%	3	16.7%	6	28.6%	3	14.3%
Developmental Pool	4	14.3%	0	0.0%	20	30.3%	15	22.7%

Table 1: Comparison of Senior Level Positions and Developmental Pool for 2002 and 2007

Source: USCP/National Finance Center (NFC) data for 2002 and 2007. Rounded to nearest whole number.

Additionally, a comparison of the Federal Workforce (FW) and the Civilian Labor Workforce (CLF)<sup>4</sup> to USCP's total workforce showed that overall; USCP's total minority representation was greater than the FW and the CLF. However, women remain underrepresented in USCP's total workforce as compared to the FW and the CLF.

<sup>&</sup>lt;sup>1</sup> By minorities, we refer to people in the following racial and ethnic groups: African American, American Indian/Alaska Native, Asian/Pacific Islander, and Hispanic. <sup>2</sup> Social Engenties Social (SER)

<sup>&</sup>lt;sup>2</sup> Senior Executive Service (SES) members are individuals with civil service status (permanent) who serve in positions below the top political appointees in the executive branch of government. USCP does not have SES positions. For senior level positions, we included equivalent graded USCP employees CP 14 and 15, administratively determined positions, and Deputy Chiefs.

<sup>&</sup>lt;sup>3</sup> The vast majority of potential successors for career SES positions come from the general schedule pay (GS) pay plan for grades GS-15 and GS-14. USCP does not have GS-15 and GS-14. For succession or developmental pool, we included equivalent graded USCP employees of CP 12/13, Captains and Inspectors.

<sup>&</sup>lt;sup>4</sup> The civilian labor force is composed of those 16 and older that are employed or looking for work and not in the military or institutionalized.

Although not required, USCP has implemented some of the Government Accountability Office's (GAO) best practices and the Equal Employment Opportunity Commission's (EEOC) Management Directive 715 (MD-715) for establishing and maintaining effective diversity and equal employment opportunity programs. Nevertheless, the Chief of Police is committed to diversity and believes USCP could achieve a more diverse workforce if it had additional resources for a formal program and other diversity initiatives. In its FY 2009 budget request, USCP requested funding for a diversity officer position.

The Office of Compliance (OOC) for legislative branch agencies administers the alternative dispute resolution program established by the Congressional Accountability Act<sup>5</sup> (CAA). Thus, the OOC provides USCP employees a dispute resolution process of counseling and mediation for settling employment discrimination and retaliation allegations as shown in Appendix A. During FY 2007, 18 USCP employees requested counseling through the OOC process. USCP employees may also report complaints through the Collective Bargaining Agreements grievance process and/or USCP complaint process. Our review of the grievance log for 2007 did not show any discrimination or retaliation complaints. USCP's Office of Professional Responsibility (OPR), the element responsible for investigating anti-discrimination and reprisal allegations, reported four cases for FY 2007.

According to USCP General Order No. **Second** the Department has an ombudsman program to provide employees with a confidential, neutral, and informal method of addressing work-related problems and concerns. Yet according to USCP officials, the ombudsman position has been vacant for over five years. An official explained that this General Order is on USCP's recommendation list to be rescinded and would be replaced by the establishment of a new "Cooperative Resolution Center." However, the official was unable to provide an expected date of implementation.

Although GAO and EEOC guidance does not apply to USCP, lacking other guidance, OIG believes it provides useful criteria to evaluate whether USCP is establishing and maintaining effective EEO and diversity management programs such as independent authority and reporting relationships. Accordingly, OIG found that OPR is independent of USCP's General Counsel (GC) and its Office of Human Resources (OHR). However, some USCP personnel conducting discrimination investigations did not have any formal training. According to officials, USCP investigators have been unable to gain any real expertise because of the small number of EEO complaints.

USCP's General Order No. **Sector Constitution of Sector Constitution**, states that the review of disciplinary cases is within the Office of General Counsel. However, we found that USCP's Office of Employment Counsel (OEC) conducts disciplinary reviews and handles both legal sufficiency reviews and representation of EEO complaints. EEOC best practices states "Maintaining distance between the fact-finding and defensive

<sup>&</sup>lt;sup>5</sup>2 U.S.C. 1301 et seq. The OOC - having jurisdiction - applies Title VII to the Legislative branch and looks to the EEOC for guidance.

functions of the agency enhances the credibility of the EEO office and the integrity of the EEO complaints process. Legal sufficiency reviews of EEO matters must be handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints."

OIG is recommending that USCP finalize its draft *Human Capital Strategic Workforce Plan*, which is intended to create and maintain a positive work environment where the similarities and differences of individuals are valued, so that all can reach their potential and maximize their contributions to the organization's strategic goals and objectives. In addition, USCP should consider whether outsourcing investigations of employment discrimination cases is more efficient and effective. Further, USCP should consider separating the incompatible functions of legal sufficiency reviews and representation of employment discrimination complaints.

We conducted an exit conference with USCP officials on May 28, 2008. Their comments are incorporated into this report as applicable and in their entirety in Appendix D.

#### Background

In November 2007, the Chairman, Subcommittee on Federal Workforce, Postal Service, and the District of Columbia; Committee on Oversight and Government Reform; House of Representatives; requested that the legislative branch OIGs conduct an audit of the diversity program(s) within their respective agencies. The Chairman's request was prompted by Subcommittee concerns involving the representation of women and minorities in the agencies' senior level positions.



USCP's total workforce demographics as of September 30, 2007, are shown in Figure 1.

As of September 30, 2007, USCP had a workforce of about 2,000 (1,587 sworn officers and 414 civilians) and a budget of about \$256 million. According to USCP's strategic plan, its mission is "to protect the Congress, its legislative processes, Members, employees, visitors, and facilities from crime, disruption, or terrorism. We protect and secure Congress so it can fulfill its constitutional responsibilities in a safe and open environment."

USCP does not have general schedule or SES position classifications but uses an equivalent level for senior civilians, sworn officers, and administratively determined positions. Subject to statutory limits, the Chief of Police has final authority for the human capital, through USCP's Chief Administrative Officer and OHR, which includes position planning, staffing, and utilization; executive development both civilian and sworn; performance appraisals; and pay administration.

Unlike executive branch agencies, which receive guidance from EEOC, the CAA provides legislative branch entities, including USCP, guidance related to employment and workplace safety laws. The CAA protects both current employees and job applicants, and in certain instances, former employees and members of the public. The CAA, as amended, is implemented through the OOC. Section 301(h) of the CAA requires the OOC to:

... 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 Act and results 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 OOC administers the alternative dispute resolution program cstablished by the CAA. "Disputes mandated to go through the ADR process include allegations of violations of the CAA under the anit-discrimination provisions, the Family and Medical leave Act, Fair Labor Standards Act, Polygraph Protection, protections in the event of a mass layoff, veteran's employment rights, and prohibition of intimidation or reprisal." The ADR process includes counseling, mediation, hearings, and appeals in a confidential setting. The process adheres to strict time lines as shown in Appendix A.

USCP General Order No. that allows civilian employees, officials, and non-bargaining unit officers to resolve their grievances with management fairly and expeditiously. USCP General Order No. also provides employees the Department's procedures for addressing complaints of alleged misconduct. Both General Order No. and USCP Operational Directive No. state that USCP's OPR, Internal Affairs Division (IAD,) will

investigate discrimination or harassment complaints. Further, USCP General Order No.

and informal method of addressing work-related problems and concerns.

· USCP's OHR manages recruiting efforts and the promotion processes, directs efforts to promote hiring, development and retention of employees, and tracks diversity statistics.

#### **Objectives, Scope, and Methodology**

Our objectives were to (1) identify and assess the diversity programs within the Department to determine if the program is yielding the desired results -- creating a more diverse population of women and minorities in top leadership positions (Senior Level and GS-15, or equivalent); (2) evaluate the accuracy and completeness of complaints and discrimination data being reported to Congress; and (3) assess to what degree the diversity office is independent of the Department's General Counsel and the agency head. The legislative OIGs developed an agreed-upon plan to audit their respective agency's program(s) so that comparable information would be available to the requestor. Our scope included the diversity program(s) in effect as of January 1, 2008, and complaint and discrimination data for FY 2007. Differing from the Chairman's initial request, each OIG audited and issued a separate report for its respective agency.

To determine whether USCP diversity program(s) was achieving desired results, we requested that the OHR and OEC complete the EEOC MD-715 Self Assessment Checklist.<sup>6</sup> We also compared USCP diversity initiatives with leading diversity management practices identified by GAO.<sup>7</sup> We used the GAO report because it provided effective benchmarks to assess USCP's diversity initiatives.

In addition to GAO and EEOC best practices, we used OOC guidance and the following USCP guidance as criteria for this audit:



<sup>&</sup>lt;sup>6</sup> OIG used this document to gain an understanding of USCP initiatives. USCP is not subject this EEOC guidance, which is applicable for executive agencies.

Diversity Management: Experts Identified Leading Practices and Agency Examples (GAO-05-90) issued January 2005.

We also interviewed USCP officials to gain an understanding of USCP's diversity initiatives, focusing on specific initiatives for women and minority representation in senior level positions.

To obtain data related to USCP complaint and discrimination data for FY 2007, we coordinated with OOC and USCP's OPR. As OOC is independent of USCP, we relied on the accuracy and completeness of its complaint and discrimination data. For USCP data, we used GAO's *Plan for Data Reliability Assessment*. We reviewed supporting documentation and interviewed OPR officials to ascertain how the Department collected, recorded, and reported its data.

To assess the extent of USCP authority and reporting relationships, we reviewed organizational charts and interviewed USCP officials (OEC, OHR, OPR and GC) to confirm their respective roles regarding equal employment opportunity and affirmative action. Although USCP is not subject to this guidance, we used EEOC Management Directive 110 (MD-110) Chapter 1, Section II, Agency and EEOC Authority and Responsibility, EEO Director – Independent Authority and Relationships, as best practices.

We conducted fieldwork in Washington, D.C. from March 18 through May 21, 2008. Our audit was performed in accordance with generally accepted government auditing standards issued by the Comptroller General of the United States except for independent referencing<sup>8</sup> and included such procedures, as we considered necessary under the circumstances. OIG conducted an exit conference on May 28, 2008 with Department officials and incorporated applicable comments in this report.

#### Results

Although USCP does not have a formal diversity program as of January 2008, its efforts in recruitment and merit promotion have improved its workforce diversity by increasing the number of women and minorities in senior level positions and developmental pools for senior level jobs. The OOC is required to report complaint and discrimination data to Congress. OOC reported in its FY 2007 Annual Report that 18 USCP employees requested counseling. Under the terms of USCP's current collective bargaining agreements 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, and/or with USCP, or a grievance under the collective bargaining agreements. USCP's organizational element responsible for conducting EEO investigations, OPR, is independent of the OHR and GC and reports directly to the Chief of Police. Yet, USCP's OEC conducts both the legal sufficiency review and represents the Department/Capitol Police Board in EEO matters.

<sup>&</sup>lt;sup>8</sup> GAS 8.45 states one technique to help ensure that an audit report meets reporting standards is to use a quality control process such as referencing. Referencing is a process in which an experienced auditor who is independent of the audit verifies that statements of facts, figures, and dates are correctly reported, and that the findings are adequately supported by the audit documentation, and that the conclusions and recommendations flow logically from the support. As of July 2008, OIG had only one auditor on staff.

# **WORKFORCE DIVERSITY**

Although it does not have a formal diversity program or an EEO program function, USCP has shown some progress in improving diversity at the senior level. Employee data from the National Finance Center<sup>9</sup> showed that for FY 2007, the overall representation of women and minorities increased in USCP's senior level positions and its developmental pool for potential successors since FY 2002. Overall, total minority groups are better represented in USCP's total workforce than the FW and the CLF. To improve its total workforce diversity, USCP is following some of the leading diversity management practices identified by the GAO and the EEOC.

#### **Progress in Improving Diversity in Senior Level Positions**

USCP has made some progress in improving diversity in senior level positions. Overall, the number of senior level positions has increased from 18 to 21 between 2002 and 2007. Within that total, the representation of women increased from about 17 percent to about 29 percent, whereas the representation of minorities declined by about 3 percent. A comparison of USCP and governmentwide senior level percentages for 2007 showed that representation of women in USCP's senior level positions was 28.6 percent, which was slightly higher than the career SES governmentwide percentage of about 28.2 percent. However, representation of minorities in USCP's senior level positions was 14.3 percent, which was below the career SES governmentwide percentage of 16.6 percent, as shown in Table 2.

Senior Level	2002		2002 2007		2007 SES G	overnment wide
Positions	Number	Percent	Number	Percent	Number	Percent
Minorities	3	16.7%	3	14.3%	3,241	16.6%
Women	3	16.7%	6	28.6%	5,513	28.2%

Table 2: Comparison of 2002 and 2007 Minorities and Women in Senior Level Position	Table 2: (	Comparison o	f 2002 and 20	07 Minorities and	Women in Senio	r Level Position
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Source: USCP/National Finance Center data, USCP November 2007 testimony data, and Office of Personnel Management Federal Equal Opportunity Recruitment Program Report for FY 2007.

However, data as of May 12, 2008, showed USCP minority representation at the senior level<sup>10</sup> compared more favorably with SES governmentwide data for 2007.

Representation of total minorities increased to about 23 percent, which exceeded minority representation governmentwide as shown in Table 3.

<sup>&</sup>lt;sup>9</sup> The United States Department of Agriculture, National Finance Center, is the payroll service provider for the Department.

<sup>&</sup>lt;sup>10</sup> In 2008, the total number of USCP senior level equivalent positions increased to 22.

Senior Level Positions	African Americans	American Indian/Alaskan Native	Asian Americans/ Pacific Islanders	Hispanic	Total Minorities	Caucasian
USCP Number	4	0	0	1	5	17
USCP Percent	18.20%	0%	0%	4.5%	22.7%	77.30%
SES Governmentwide	6.1%	0.9%	5.7 %	4.0%	16.7%*	83.3%

Table 3: 1	USCP Semor	Level Positions	(May 2008)	<b>Compared</b> to SES	Governmentwide	(2007)
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Source: USCP data as of May 12, 2008 and Office of Personnel Management Federal Equal Opportunity Recruitment Program Report for FY 2007. \*Total minorities percentage does not add to percentages shown in Table 2 due to rounding.

To determine if USCP's senior level representation was reflective of its total workforce, we compared total workforce demographics to women and minority representation in senior level positions as of May 12, 2008, as shown in Figure 2. We found that women made up about 23 percent of USCP's total workforce and women were proportionally represented in senior level positions. Although, representation of women in senior level positions had decreased from about 29 percent in 2007 to about 23 percent as of May 2008. While about 39 percent of USCP's total workforce was minority, only about 23 percent was represented in senior level positions. Despite a trend of increasing minority representation in senior level positions, minorities remain underrepresented compared to USCP's total workforce.



#### Progress in Improving Diversity in the Developmental Pool

USCP also has made progress in improving diversity in the developmental pool for senior level positions. Responsible USCP officials have attempted to increase this diversification by targeting outreach and recruitment activities, and by attending conferences, conventions, and job fairs associated with diversity. Overall, the senior level developmental pool has increased from 28 to 66 positions between 2002 and 2007. Within that total, the representation of women increased from 14.3 percent to 30.3 percent, whereas the representation of minorities increased to 22.7 percent as shown in Table 4. Although, USCP compared favorably with the governmentwide SES developmental pool for total minorities, three categories (American Indian/Alaskan Native, Asian Americans/Pacific Islanders, and Hispanic) were below governmentwide percentages as shown in Table 5. Diversity trends in the development pool from 2002 to 2007 are shown in Figure 3.

aute 4. Comparison of	2002 ana 2007	Denior Level De	velopmental Pool		
CP-12/13 & Captain/Inspector	20	02	200	07	
	Number	Percent	Number	Percent	
Minorities	0	0.0%	15	22.7%	
Women	4	14.3%	20	30.3%	

#### Table 4: Comparison of 2002 and 2007 Senior Level Developmental Pool

Source: USCP/National Finance Center data for 2002 and 2007.

#### Table 5: Profile of USCP and Governmentwide Developmental Pool for 2007

Developmental Pool	African Americans	American Indian/ Alaskan Native	Asian Americans/ Pacific Islanders	Hispanic	Total Minorities
USCP Percent	18.2%	0.0%	3.0%	1.5%	22.7%
Governmentwide	10.4%	1.0%	6.5 %	4.5%	22.40%

Source: USCP/National Finance Center data for 2007 and GAO's report: Human Capital, Diversity in the Federal SES and Senior Levels of the U.S. Postal Service and Processes for Selecting New Executives (GAO-08-609T) dated April 3, 2008.



Source: USCP NFC data for 2002 through 2007.

Nevertheless, USCP's ability to improve its employment diversification has recently been limited by prevailing budget constraints and continuing resolutions and the lack of a formal diversity program according to USCP's OHR Director. For example, in FY 2007, USCP had 178 separations and was unable to hire 115 replacements (62 sworn officers and 53 civilians) because of the continuing resolution. As of September 30, 2007, USCP's total distribution of separations within its total workforce included about 24 percent women and 37 percent minority employees as shown in Table 6. In its FY 2009 budget, the Department requested funding for a diversity officer position. USCP originally requested funding for this position in 2003.

Gender	African American	American Indian/ Alaskan Native	Asian/ Pacific Islander	Hispanic	Total Minority	Caucasian	Total	Gender Percent
Female	18	1	1	3	23	19	42	23.60%
Male	27	0	4	12	. 43	93	136	76.40%
Total	45	1	5	15	66	112	178	100.00%
Percent	25.28%	0.56%	2.81%	8.43%	37.08%	62.92%	100.00%	

Table 6: Distribution of Separations Within Total Workforce as September 30, 2007

Source: USCP separation data as of September 30, 2007.

#### **Progress in Improving Total Workforce Diversity**

Under Office of Personnel Management's regulations implementing the Federal Equal Opportunity Recruitment Program, executive agencies are required to determine where representation levels for covered groups are lower than the CLF and take steps to address those differences. EEOC's Management Directive 715 (MD-715) also provides guidance to executive agencies for establishing and maintaining effective EEO programs, including self-analysis to determine whether barriers to EEO exist and to identify and develop strategies to mitigate or eliminate the barriers to participation. The initial step is for agencies to analyze their workforce data with designated benchmarks, including the CLF.

Although, USCP is not subject to EEOC guidance such as analyzing its workforce, we present this information for benchmarking and potential best practices. Our comparison of permanent FW, total CLF, to USCP total workforce showed that overall USCP's total minority representation was greater than both the FW and the CLF. Total minorities represented 39.18 percent of USCP's total workforce in May 2008, while total minorities represented 32.80 and 28.40 percent in the FW and CLF for 2007, respectively. Although, USCP's representation of all other minority groups (American Indian/Alaskan Native, Asian/Pacific Islander, and Hispanics) was lower than the FW and the CLF, as shown in Figure 4. Furthermore, women represented 43.9 percent of the FW in 2007, the same percentage as in 2006. The representation of women in the CLF was 45.7 percent in 2007, compared to 45.4 percent in 2006. Women represented 23.25 percent of USCP's total workforce as of May 2008, compared to 23.54 percent in 2007.



Source: FW and CLF data - OPM Federal Equal Opportunity Program Report for FY 2007 and USCP data as of May 2008. Percentages may not total 100 due to rounding.

#### **Best Practices for Diversity Management**

USCP has adopted some of the model practices recommended by the GAO and the EEOC in its MD-715. Specifically, USCP has adopted 4 of 9 best diversity management practices that have been identified by GAO as shown in Table 7. The Chief of Police has taken steps to foster an understanding of the value of a more diverse and inclusive work environment. USCP also (1) has established a recruitment process for attracting a supply of qualified, diverse applicants for employment; (2) holds top managers accountable for diversity by linking performance assessment and compensation to the progress of diversity initiatives; and (3) provides cultural diversity, discrimination, and sexual harassment training to sworn officers and new recruits. However, we noted that USCP has not provided similar training to its civilian workforce. Unlike the EEOC requirement in executive agencies, it is not a USCP requirement for all managers and supervisors to take *Alternative Dispute Resolution* training. An OHR official explained that limited training funds "inhibit" USCP's ability to seek training opportunities for management courses.

Identified Leading Diversity Management Practices		Level of adoption					
	Do not anticipate adopting	No decision made, not in use	Will adopt	Plan under development	Written plan complete	Partially adopted	Fully adopted
Top leadership commitment	Y						Ø
Diversity as part of an organization's strategic plan	4			M			
Diversity linked to performance							N
Measurement		÷	Ø	1			
Accountability	1				· · · · · ·		Ø
Succession planning					_		
Recruitment						5	
Employee involvement				-			
Diversity training			N				

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Source: GAO's report, Diversity Management: Experts Identified Leading Practices and Agency Examples (GAO-05-90). USCP data as of May 2008.

USCP's OHR has developed the Department's first Strategic Human Capital and Workforce Plan, which includes succession planning. Succession planning provides USCP with a prime opportunity to improve diversity representation of its senior level through new appointments. Incorporating diversity program activities and objectives into its succession planning is the first step towards achieving satisfactory diversification. Without first identifying the critical positions and the needed skills and abilities USCP needs in its future workforce, it is difficult to develop effective diversification strategies and focus training, career development, and mentoring programs to help minorities and women advance. According to OHR, USCP expected to issue this plan in June 2008.

USCP has several training and developmental programs to help minorities and women advance to senior level positions as shown in Appendix C. USCP has women and minorities enrolled in the Johns Hopkins, "Public Safety Executive Leadership Program (PELP)." This program is one of the nation's most comprehensive interdisciplinary programs, designed specifically for current and future leaders in the field of public safety. PELP is a rigorous curriculum built on the themes of quality leadership, values, ethics and integrity, managing differences, and interagency cooperation and collaboration. The program provides opportunities to interact with recognized experts in each of these areas and is designed to develop new and enhance existing leadership, management, human resources, and problem solving. USCP has participated in this program since 2002.

During 2008, USCP also participated in the Senior Executive Service Federal Candidate Development Program, which is designed to assist Federal agencies meet their succession planning goals and contribute to the Department's effort to create a highquality leadership corps. This program is an intensive development opportunity containing educational components including classroom training, interagency experiences, rotational assignments, mentoring, coaching, field experiences, and webbased learning. This program also exposes the candidates to the best leaders in the Federal Government. For its first year, USCP enrolled an Information Technology manager representing a minority group (Asian), who is in the CP-13 developmental pool for continuing professional development for executive leadership.

In addition to implementing GAO's best practices, USCP has shown a willingness to follow some of the recommended essential elements of EEOC. EEOC MD-715, Self Assessment Checklist Measuring Essential Elements<sup>11</sup> is shown in Table 8. Although MD-715 does not apply to USCP as a legislative agency, lacking other guidance, OIG believes it provides useful criteria to evaluate whether USCP is establishing and maintaining effective EEO and diversity management programs.

MD-715 Essential Element	USCP Fulfillment
Demonstrated Commitment from Agency Leadership	Commitment in draft Human Capital Strategic Workforce Plan and Strategic Recruiting Business Plan.
Integration of EEO into the Agency Strategic Mission	USCP does not have a diversity or EEO program. USCP requested diversity officer to effectively carry out a successful program.
Management and Program Accountability	USCP is holding managers and supervisors responsible for the effective implementation of EEO and diversity by linking it to USCP's Strategic Plan and employee performance standards.
Proactive Prevention	USCP employees have several avenues to address work place issues such as the negotiated grievance under the Collective Bargaining Agreements. In addition, USCP plans to implement a "Conflict Resolution Centér" to informally address workplace issues. Furthermore, USCP employee can file with the Office of Compliance.
Efficiency	USCP follows the Office of Compliance mediation process. The Office of Compliance and USCP process settlement agreements. USCP does not have adequate staffing or funding for an effective EEO program.
Responsiveness and Legal Compliance	The Office of Compliance issues decisions on matters covered by the CAA. USCP also monitors findings of administrative judges and hearing officers to ensure compliance with any court orders.

#### Table 8: EEOC MD-715 Elements and USCP Fulfillment

Source: EEOC Management Directive 715, Self Assessment Checklist.

Nevertheless, USCP needs to improve in several areas. For example, USCP EEO policy statements are not current. Further, USCP Operational Directive PRF

USCP provides new employees a copy of its EEO policy statement as well as the OOC Dispute Resolution Process Pamphlet.

<sup>&</sup>lt;sup>11</sup> The Self-Assessment Checklist is designed to provide an efficient and effective means for each federal agency to determine whether its overall EEO program is properly established and compliant with the essential elements (standards) set forth in EEO MD-715.

As stated previously, USCP does not have sufficient human resources and budget allocations to formalize a program office for diversity and EEO initiatives. Thus, USCP has not conducted a barrier analysis needed to identify systemic barriers impeding full minority participation in upper level management positions. In addition, to quantitative data, qualitative data derived from interviews, focus groups, and surveys can be helpful in identifying employee perceptions including available opportunities and work environment/culture among various segments of the workforce. For example, organizations can ask employees a series of general organizational questions in such areas as workplace climate, organizational commitment, promotions, job satisfaction, supervision, and performance evaluations.

To some extent, USCP has used employee surveys and focus groups to assess performance of key mission support functions. This has included survey and focus groups going beyond diversity ethnicity and gender to include sworn and civilian dynamics. The Chief of Police has also revamped the participation on the Chief's Advisory Council by including USCP representatives, both sworn and civilian, across the Department. Yet, USCP has not consistently conducted exit interviews and evaluated the data to determine why employees leave. For example, of the 178 employees that separated from USCP in 2007, only 123 individuals (94 sworn officers and 29 civilians) participated in the optional exit survey. Similarly, USCP has not analyzed promotions and performance evaluations by race and gender.

#### Conclusions

USCP does not have a formal diversity or EEO program. USCP employees have diversity and EEO duties assigned in a collateral capacity. USCP has increased the representation of women and minorities in both senior level positions and developmental succession pools. Additionally, USCP's workforce diversification of senior level positions compared favorably to the executive branch representation. USCP is following GAO and EEOC diversity and EEO best practices; however, budgetary resources have restricted its efforts. Leadership, especially at the senior level, is essential to providing accountable, committed, consistent, and sustained attention to human capital and related organizational transformation issues. Having a diverse senior management can bring a wider variety of perspectives and approaches in decision-making. Thus, OIG is making the following recommendation.

<u>Recommendation 1</u>: 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.

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# **COMPLAINT/DISCRIMINATION DATA**

OOC is responsible for reporting complaint and discrimination data to Congress. USCP employees have several avenues when filing an unlawful employment discrimination complaint - OOC, Union, and/or the Department. The CAA, through OOC, provides a mandatory dispute resolution process of counseling and mediation for the settling of disputes and complaint hearing appeals. Furthermore, USCP's **Sector Constitution** (USCP General Order No. **Sector** is designed to provide all employees with a confidential, neutral, and informal method of addressing work-related problems and concerns.

#### **Reporting by the Office of Compliance**

Section 301(h) of the CAA requires the OOC to "...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 inititated proceedings with the Office under this Act and results of such proceedings, and on the number on the number of covered employees who filed a complaint, the basis for the complaint, and the action taken on the complaint."

According to the OOC's Annual Report for FY 2007, 18 of 2001 USCP employees requested counseling. The OOC explained that 2 of 18 requests for counseling did not allege violations of the anti-discrimination or reprisal provisions. Of the 16 remaining cases, 15 requested meditation as shown in Table 9. Of the 15 cases where mediation was requested, OOC and USCP have closed 11 cases and 4 are still pending. Resulting monetary awards and settlements totaled \$60,000 for 2007. The basis of alleged discrimination is shown in Table 10.

Activity	USCP
Number of Employees Requesting Counseling	18
Number of Employees Requesting Counseling that did not allege anti- discrimination or reprisal provisions	2
Total Anti-Discrimination or Reprisal Allegations	16
Number cases requesting mediation	15

19

Table 9: OOC Counseling Activity

Source: Office of Compliance.

USCP
7
3
4
2
10

Table 10. Rasis of Discrimination

Source: Office of Compliance.

#### **Reporting by USCP**

USCP is not required to report EEO statistics under the CAA. However, under the terms of USCP's current Collective Bargaining Agreements 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 Collective Bargaining Agreements require that USCP have a grievance process. USCP General , allows civilian officials, and non-Order No. bargaining unit officers to resolve their grievance with management. The Collective Bargaining Agreement, Article 32, provides bargaining unit members a process to resolve grievances. Our review of the FY 2007 grievance log did not show any grievance related to EEO discrimination.

: states that all USCP General Order No. complaints pertaining to departmental policies or procedures or that allege misconduct by any employee of the Department shall be documented, registered, and investigated by the Department. The General Order further states that any complaint or allegation related to sexual or racial discrimination, or harassment or breaches of civil rights shall be investigated by IAD. For FY 2007, IAD initially reported four cases as employment discrimination. IAD determined that only 1 of 4 was based on discrimination. IAD investigated this complaint and determined it to be unfounded. The other three complaints were found to be courtesy, conduct unbecoming, or noncompliance issues.

#### **Inactive Ombudsman Program**

According to USCP General Order No. the Department has an ombudsman program to provide employees with a confidential, neutral, and informal method of addressing work-related problems and concerns. According to the General Order, the ombudsman program is organizationally located outside the normal chain of command. "The independence of the Ombudsman Program is designed to provide the Ombudsman with accessibility to all personnel of the Department; and freedom from internal controls and pressures." However, according to USCP officials, the ombudsman position has been vacant for over five years. A USCP official explained that General Order is on USCP's recommendation list to be rescinded. According to this official, the principles

<sup>12</sup> A single request for counseling may allege more than one basis of discrimination.

associated with an ombudsman program would be replaced by the establishment of a new "Cooperative Resolution Center," the policy for which is contained in a new **Contraction** directive that is currently under formal legal review. The official was unable to provide an expected date of issuance.

#### Conclusions

The CAA requires OOC to compile and publish statistics on the use of the Office [OOC] by covered employees [USCP]. USCP employees may report EEO complaints through the OOC process, Union Collectively Bargaining Agreements grievance process, and USCP complaint process. During FY 2007, 16 USCP employees requested counseling through the OOC process, which related to unlawful employment discrimination and/or prohibition on intimidation and retaliation. A review of the grievance log for 2007 showed no discrimination complaints and USCP's IAD reported one discrimination case. The Ombudsman Program is inactive. A proposed Cooperative Resolution Center would replace this activity; however, USCP did not provide an effective date for implementation. Thus, OIG is making the following recommendation.

<u>Recommendation 2</u>: We recommend the United States Capitol Police immediately assign an individual to the Ombudsman Program or rescind General Order **Complete Additionally, USCP should finalize and publish its** with the Office of Compliance.

## **INDPEPENDENT AUTHORITY AND RELATIONSHIPS**

EEOC's MD-110, Chapter 1, Section III, Agency and EEOC Authority and Responsibility, EEO Director – Independent Authority and Relationships requires (1) direct reporting to the agency head, (2) separation of duties (i.e. manager of EEO complaint discrimination process must be different from the manager with personnel functions), and (3) legal sufficiency review should be done by a unit separate from the legal unit that will represent the agency in court. As previously stated, USCP is subject to the CAA and not EEOC's directives. Nevertheless, using this guidance as best practices and for comparable data among legislative agencies, we assessed independence in these three areas.

#### **Independent Authority and Reporting**

The Department does not have a separate diversity or EEO office. However, the USCP organizational element responsible for conducting investigations of discrimination and harassment complaints reports directly to the Chief of Police. This reporting structure provides OPR the independence to carry out investigations of EEO complaints. In 2005, Congress mandated that the Department establish OPR. IAD was incorporated into OPR, the element responsible for investigating allegations of misconduct by Capitol Police

employees generated from within the Department or outside sources. Prior to 2005, IAD also reported directly to Chief of Police. According to USCP General Order No.

According to Department officials, OPR does not have a formal training program for EEO investigators. As of May 2008, only two investigators had received 32-hours of training (*EEO Training for New Investigators*). The officials further stated that not only are they faced with the challenge of EEO training, but that OPR investigators do not conduct EEO investigations often enough to gain sufficient expertise. Neither of OPR's senior officials had received any formal training in conducting EEO investigations. Some executive branch agencies and legislative agencies find it more efficient and effective to outsource investigations of EEO complaints to experienced investigators.

#### Separation from the Office of the General Counsel and the Office Human Resources

OPR, which includes the element responsible for conducting investigations of discrimination and harassment complaints, is separate from USCP's Office of General Counsel (OGC) and OHR and reports directly to the Chief of Police, as shown in Figure 5.





Source: Portion of USCP organizational chart dated June 2006.

#### Legal Sufficiency Reviews and Representation in Court

According to EEOC MD-110, "Heads of agencies must not permit intrusion on the investigations and deliberations of EEO complaints by agency representatives and offices responsible for defending the agency against EEO complaints. Maintaining distance between the fact-finding and defensive functions of the agency enhances the credibility of the EEO office and the integrity of the EEO complaints process." MD-110 requires that "Legal sufficiency reviews of EEO matters must be handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints. The Commission requires this separation because impartiality and the appearance of impartiality are important to the credibility of the equal employment program."

OIG found that USCP has not established an effective separation of legal sufficiency review from agency representation as recommended by the EEOC. The OEC conducts legal sufficiency review on EEO matters and represents the Department/Board in court and functions as the Disciplinary Review Officer (DRO). Pursuant to USCP General Order No. **Sector Conducts** the primary function of the DRO is to review disciplinary cases and present them to the DRB. By performing the functions of DRO, OEC attorneys would be required to participate in a review of disciplinary processes for legal sufficiency, recommend penalties for sustained violations and, in many instances, present the cases to a DRB arguing in favor of upholding the investigation findings and enforcing the recommended penalties.

MD-110 also states it would be intrusive for the individual who represented the agency in an equal employment hearing to have authority to approve decisions with respect to resolution in the same or related cases. Impartiality or appearance of impartiality is undermined where members of the office where the representative is employed have the legal sufficiency function with respect to cases in which a colleague served as agency representative. OEC explained that although the same office may handle all these functions, different individuals conduct the legal sufficiency review and represent the Department and Board in court matters.

In addition, General Order **Sector** states that the DRO is a unit of the OGC, not the OEC. Since OEC attorneys are not OGC attorneys and not supervised by OGC, this raises the question of the underlying authority of OEC attorneys to handle DRO functions. General Order **Sector** further states that the actions of the DRO are "subject to the direction of the General Counsel" and that the DRO is to provide assistance on disciplinary matters to the Chief of Police, General Counsel, and Internal Affairs and Inspections Division. Nowhere in General Order **Sector** is OEC given authority to intervene in this disciplinary process. Thus, USCP should assess whether a new directive or general order is needed changing the disciplinary processes.

An official also stated that OEC did not have policies and procedures or an approved business plan linking its activities to USCP's strategic goals and objectives. During the exit conference with Department officials, the Chief Administrative Officer stated that the OEC had prepared a business plan but the plan had not yet been reviewed and approved.

#### Conclusions

EEOC guidance does not apply to USCP. Although, lacking other guidance, EEOC provides useful criteria to evaluate whether USCP is establishing and maintaining effective EEO and diversity management programs, such as independent authority and reporting relationships. The USCP element responsible for conducting EEO investigations is independent of USCP's GC and OHR. However, according to USCP officials, its investigators need more training and experience in conducting EEO investigations.

USCP's OEC handles disciplinary reviews and legal sufficiency reviews, and represents the Department and Board in EEO complaints. Best practices state that legal sufficiency reviews of EEO matters must be handled by a functional unit that is separate and apart from the unit which handles agency representation in EEO complaints. Furthermore, USCP was not following its internal procedures related to disciplinary reviews. Thus, OIG is making the following recommendations.

<u>Recommendation 3</u>: 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 USCP choose the most efficient and effective manner to investigate EEO complaints, within budgetary constraints.

<u>Recommendation 4</u>: 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 USCP strategic goals and objectives. In addition, 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, USCP should assess whether a new directive or general order is needed changing the disciplinary processes.

# APPENDICES

Audit of the United States Capitol Police Workforce Diversity

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## OFFICE OF COMPLIANCE THE DISPUTE RESOLUTION PROCESS Under the Congressional Accountability Act





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# UNITED STATES CAPITOL POLICE RECRUITING PLAN for 2007

Date	Recruiting Activity	Location		
2/17/07	South Carolina Alliance 2020			
2/22/07	Career Consortium of Metrolina Colleges Charlotte, NC			
2/23/07	JETS/USO Job Fair	Fort Myer		
3/2/07	Washington Wizards Sports/Entertainment Fair Washington, DC			
3/15/07	Women for Hire St. Louis, MO			
3/22/07	Wilmington College Career Fair	New Castle, DE		
3/23/07	Howard Community College Fair Columbia, MD			
3/28/07	Prince George's Community College Career Fair Largo, MD			
3/29/07	Camp Lejune Marine Corps Job Fair Jacksonville, NC			
4/4/07	Frostburg State University Career Fair	Frostburg, MD		
4/10/07	U.S. House of Representatives	Cannon Caucus Rm, DC		
4/11/07	Andrews Top Three Association Andrews AFB, M			
4/17/07	Women for Hire Boston, MA			
4/25/07	Fort Meade Community Career Fair	eade Community Career Fair Fort Meade, MD		
4/28/07	Rutgers-Newark Annual Spring Fair Newark, N.J.			
4/25/07	Latinos for Hire	Los Angeles, CA		
4/26/07	Camp Pendleton Job Fair	Camp Pendleton, CA		
5/7/07	Congressman Albert Wynn	Largo, MD		
6/15/07	Senator Dick Lugar/Visclosky Career Fan	Merrillville, IN		
6/20/07	Hiring Heroes - Walter Reed	Washington, DC		
6/27/07	Latinos for Hire	New York City		
7/10/07	Delegate Eleanor Holmes-Norton's Annual Career Fair	Washington, DC		
8/21/07	JobZone - Pax River	Lexington Park, MD		
8/23/07	JobZone – AAFB	Andrews AFB, MD		
8/29/07	Diversity Hiring Expos	Houston, TX		
9/6/07	CareerBuilders.com Job Fair	King of Prussia, PA		
9/19/07	Bowie State University	Bowie, MD		
9/19/07	Univ. of Pittsburgh @ Bradford Bradford, PA			
9/28/07	Central Maryland Career Fair	Bowie, MD		

Source: USCP Office of Human Resources.

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# UNITED STATES CAPITOL POLICE Senior Leadership Development Programs

Description of Program	Number of Recent Women and Minority Participants	
<u>The FBI National Academy</u> is a residential program, ten weeks in duration. The curriculum focuses n leadership, management training and included courses related to management, science, behavioral science, law education, forensic science and health/fitness. The candidates for this program hold the position of Lieutenant and above.	Women Minority	0
Senior Management Institute for Police (SMIP) is a program of the Police Executive Research Forum Program that provides senior police executives intensive training in the latest management concepts and practices used in business and government. A demanding three-week course, SMIP brings together a faculty from some of the nation's top universities, successful law enforcement chief executives, and subject matter experts from the private sector. It is designed for mid-to-upper- level police executives who will ultimately lead police agencies throughout the United States and other participating countries. SMIP's curriculum addresses those issues that demand the attention of today's forward-thinking law enforcement leaders. Classes are held at Boston University. The candidates for this program hold civilian senior management positions or the rank of Captain or above.	Women Minority	1 0
Johns Hopkins – "Public Safety Executive Leadership Program (PELP)" is one of the nation's most comprehensive interdisciplinary programs designed specifically for current and future leaders in the field of public safety. PELP is a rigorous curriculum built on the themes of quality leadership, values, ethics and integrity, managing differences, and interagency cooperation and collaboration. The program provided opportunities to interact with recognized experts in each of these areas and is designed to develop new and enhance existing leadership, management a, hum resources, and problem solving. The graduates of this program will complete a two-year course of study leading to a B.S. in Management and Leadership. Participants who successfully complete the two-year undergraduate program may be eligible for the one-year accelerated graduate program. Those individuals who complete the accelerated graduate program are awarded a Masters of Science degree in Management from Johns Hopkins University.	Aspiring Leaders (Undergraduate) Women Minority BS (Undergraduate) Women Minority MS (Graduate) Women Minority	1 1 2 2 2 0 1
International Chiefs of Police Fellowship (IACP) -The IACP accepts U.S. Capitol Police in the rank of Lieutenant to serve a one-year research fellowship at their headquarters in Alexandria, Virginia. The fellowship program is designed to maximize each officer's exposure to law enforcement policy issues on the national level. The benefits of the fellowship program are twofold: the research fellow returns to their agency with improved leadership skills in the areas of policy development, long-range planning, program implementation, and evaluation-based research, and IACP headquarters staff gain insight from practicing law enforcement professionals, thus improving the quality of IACP policy and research efforts. Fellows working with IACP will be assigned to the Research Directorate.	Women Minority	1 1 ,

Source: USCP Training Services Bureau as of May 2008.

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	MEMORAS	(DUM
	TO:	Carl W. Hoecker Inspector General
	FROM	Phillip D. Morse, Sr. Chief of Police
	SUBJECT:	Response to Draft Report Audit of United States Capitol Police's Workforce Diversity (Report No. OIG-2008-XX)
	Department's Audit of Unit After review concurs with Recon finaliz station abiliti should develo	of this memorandum is to provide the United States Capitol Police a response to the Office of the Inspector General's (OIG's) Draft Report ed States Capitol Police Workforce Diversity (Report No. OIG-2008-XX). of the audit findings and recommendations, the Department generally the recommendations provided in the draft report. memoration 1: We recommend that the United States Capitol Police to its draft Human Capitol Strategie Workforce Plan identifying the critical r level and supervisory/management positions and the needed skills and les required for its future diverse workforce. Based on this, the Department d specify effective diversification strategies and focus training, career opment, and mentoring programs to help minorities and women advance to positions.
	USC	Response: We generally agree and note that the Plan is part of the larger ity initiatives of the USCP.
	immed order	nmandation 2: We recommend that the United States Capitol Police diately assign an individual to the Ombudsman Program or rescind General Additionally, USCP should finalize and publish its <b>and public of</b> Directive minimizing any redundancy with the Office of liance.
	USCP Order	Response: We generally agree and will consider rescinding General when the second second directive is finalized.
		Photostally Recontinues and Decombestance on According for Law Grant Grant Sciences, 3m.

Audit of the United States Capitol Police Workforce Diversity

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