

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE INSPECTOR GENERAL**

**DEPARTMENT OF REAL ESTATE
SERVICES - PROTECTIVE SERVICES
POLICE DEPARTMENT**

REPORT OF SPECIAL EVALUATION

May 2010



**CHARLES J. WILLOUGHBY
INSPECTOR GENERAL**

GOVERNMENT OF THE DISTRICT OF COLUMBIA
Office of the Inspector General

Inspector General



May 13, 2010

Ms. Robin-Eve Jasper
Director
Department of Real Estate Services
2000 14th Street, N.W., 8th Floor
Washington, D.C. 20009

Dear Ms. Jasper:

Enclosed is our *Report of Special Evaluation of the Department of Real Estate Services' Protective Services Police Department* (OIG No. 10-I-0036AM). Comments from the Department of Real Estate Services on the inspection team's 14 findings and 28 recommendations are included in the report. This report will soon be available publically at <http://oig.dc.gov>; I encourage you to share it with your employees.

In addition, we have enclosed *Compliance Forms* on which to record and report to this Office any actions you take concerning each recommendation. These forms will assist you in tracking the completion of action(s) taken by your staff, and will assist this Office in its inspection follow-up activities. We track agency responses to all conditions cited and compliance with recommendations made in our reports of inspection. Please ensure that the *Compliance Forms* are returned to the OIG by the response date, and that reports of "Agency Action Taken" reflect actual completion, in whole or in part, of a recommended action rather than "planned" action.

We appreciate the cooperation shown by you and your employees during the special evaluation and look forward to your continued cooperation during the upcoming follow-up period. If you have questions or comments concerning this report or other matters related to the inspection, please contact me or Alvin Wright Jr., Assistant Inspector General for Inspection and Evaluations, at (202) 727-2540.

Sincerely,


Charles J. Willoughby
Inspector General

CJW/gah

Enclosure

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Mission Statement

The Inspections and Evaluations (I&E) Division of the Office of the Inspector General is dedicated to providing District of Columbia (D.C.) government decision makers with objective, thorough, and timely evaluations and recommendations that will assist them in achieving efficiency, effectiveness, and economy in operations and programs. I&E goals are to help ensure compliance with applicable laws, regulations, and policies, to identify accountability, recognize excellence, and promote continuous improvement in the delivery of services to D.C. residents and others who have a vested interest in the success of the city.

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ACRONYMS

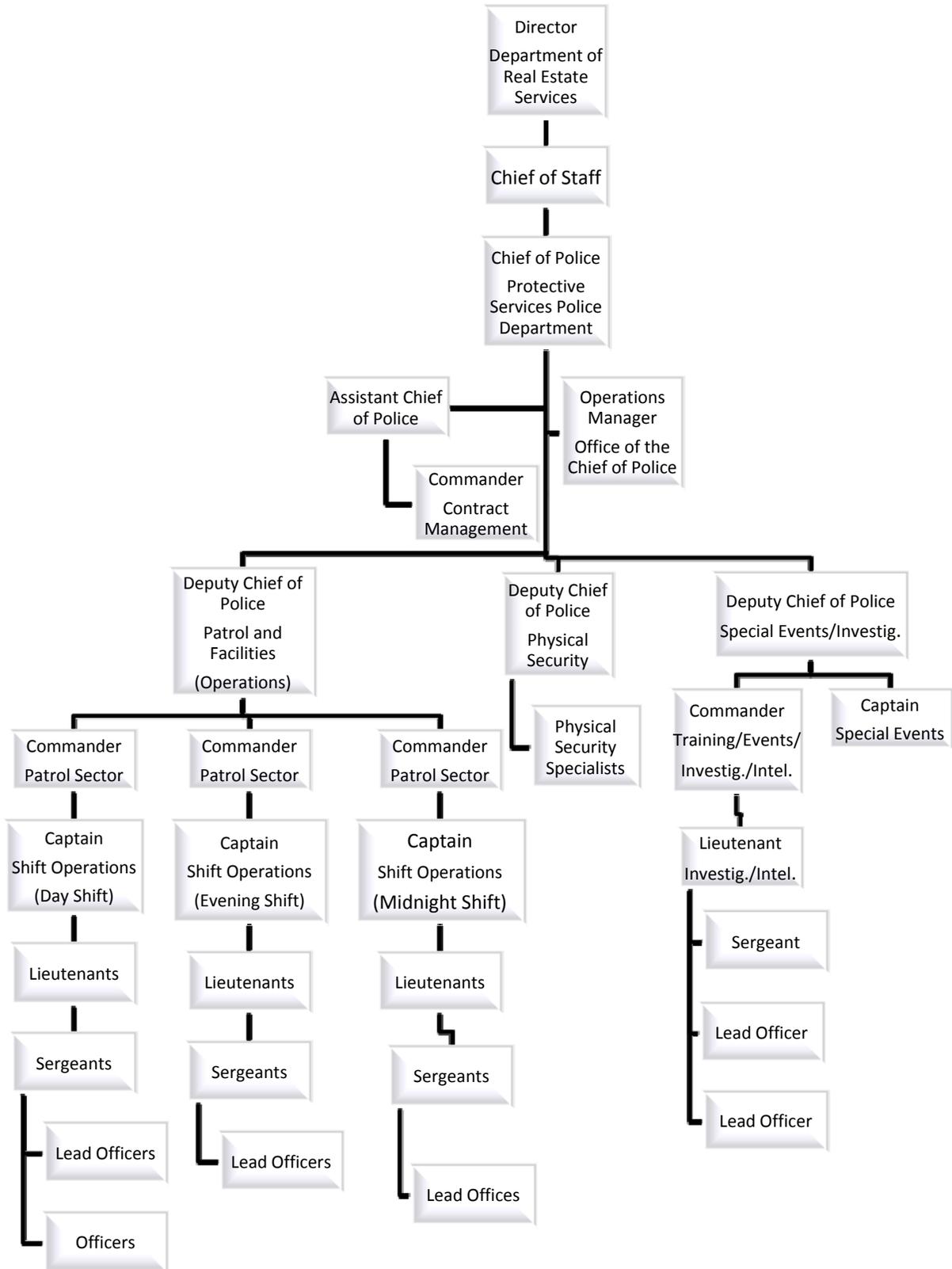
ACRONYMS

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AWOL	Absent Without Leave
CIGIE	Council of Inspectors General on Integrity and Efficiency
COTR	Contracting Officer's Technical Representative
DCMR	District of Columbia Municipal Regulations
D/DRES	Director of the Department of Real Estate Services
DPM	District Personnel Manual
DRES	Department of Real Estate Services
FTE	Full-Time Equivalent
GAO	U.S. Government Accountability Office
G.O.	General Order
HSEMA	Homeland Security and Emergency Management Agency
I&E	Inspections and Evaluations
MAR	Management Alert Report
MPD	Metropolitan Police Department
NCIC	National Crime Information Center
OC	Oleoresin Capsicum
OIG	Office of the Inspector General
OPM	Office of Property Management
PSPD	Protective Services Police Department
SOMB	Security Officers Management Branch
SOP	Standard Operating Procedures
WALES	Washington Area Law Enforcement System

ORGANIZATION CHART

DRES PSPD ORGANIZATION CHART



Organizational Structure Provided by PSPD on February 12, 2009.

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

EXECUTIVE SUMMARY

Background

The Inspections and Evaluations Division (I&E) of the D.C. Office of the Inspector General (OIG) conducted a special evaluation of the Protective Services Police Department (PSPD) of the Department of Real Estate Services (DRES)¹ from June 2008 to June 2009.² DRES supports the District government and its residents through real estate management, construction, and facilities management. DRES has four divisions:³ Construction; Portfolio Management; Facility Management; and Protective Services.⁴ PSPD “is charged with safeguarding the lives of all persons, protecting assets within property owned or leased by the District [g]overnment, and assisting in securing to all persons equal protection of the law.”⁵ PSPD employs 89⁶ protective services officers who “exercise full police authority within the judicial limits of the District of Columbia [g]overnment facilities and assist as needed at facilities occupied by the federal government.”⁷ In addition, at the time of this special evaluation, Hawk One, Inc. had a contract with DRES/PSPD to provide trained labor, management, supervision, uniforms, supplies, and equipment necessary for security services at District-owned and -leased properties to support PSPD officers and their mission.⁸

Scope and Methodology

OIG inspections comply with standards established by the Council of Inspectors General on Integrity and Efficiency (CIGIE), and pay particular attention to the quality of internal control.⁹

The special evaluation objectives were to assess the quality of internal control established by management, quality and effectiveness of personnel management, and the effectiveness and

¹ While this report of special evaluation was being drafted, the Office of Property Management (OPM) changed its name to the Department of Real Estate Services (eff. Aug. 1, 2009). The draft report sent to the agency for comment referenced OPM. Prior to publishing this final report, the OIG updated all references to OPM to reflect the agency’s new name.

² DRES inserted the following comment at this point in the draft report: “As noted in Footnote #1, the OPM name was changed to the Department of Real Estate Services (DRES). Additionally, the Division name changed from PSD to Protective Services Police Department (PSPD). Our response includes references to the current names of the Agency and the Division.” Therefore, prior to publishing this final report, the OIG updated all previous PSD references to reflect the Division’s new name.

³ DRES inserted the following comment at this point in the draft report: “A 5th Division was created in May 2009 when DRES received delegated contracting authority from the Office of Contracting and Procurement. The new Division name is Contracting and Procurement Division.”

⁴ <http://opm.dc.gov/opm/cwp/view.a,3,q,527635,opmNav,%7C31556%7C.asp> (last visited Apr. 30, 2010).

⁵ Protective Services Police Authority and Responsibilities, Chapter I, § 1(A).

⁶ DRES inserted the following comment at this point in the draft report: “The FY10 budget includes 115 FTEs in the PSPD. As of 4/13/10, PSPD is comprised of 93 officers, 7 civilian staff, 13 vacant officer positions, and 2 vacant civilian positions.”

⁷ Protective Services Police Authority and Responsibilities, Chapter I, § 1(B).

⁸ According to a PSPD senior manager, Hawk One, Inc.’s contract expired in September 2009, and a new security company was awarded the contract.

⁹ “Internal control” is synonymous with “management control” and is defined by the Government Accountability Office as comprising “the plans, methods, and procedures used to meet missions, goals, and objectives and, in doing so, supports performance-based management. Internal control also serves as the first line of defense in safeguarding assets and preventing and detecting errors and fraud.” STANDARDS FOR INTERNAL CONTROL IN THE FEDERAL GOVERNMENT, Introduction at 4 (Nov. 1999).

EXECUTIVE SUMMARY

efficiency of key operations. The team also assessed the quality of service delivery to customers; adherence to applicable laws, regulations, policies, and best practices; and compliance with any previous District government-sanctioned studies and recommendations.

The team conducted 41 interviews, reviewed files and documents, and observed security measures and staffing. A list of all the team's findings as well as the recommendations contained in this report is at Appendix 1. The team also issued a Compliance Form¹⁰ regarding employees' and the public's ability to enter the One Judiciary Square building through an eatery without being screened by security personnel at security checkpoints (Appendix 2). In addition, the team issued a Management Alert Report regarding officers' lack of critical equipment and another Management Alert Report regarding deficiencies in post orders for security posts in District-owned and -leased buildings. A summary of each Management Alert Report (MAR) and the Compliance Form are included in this report of inspection (ROI). The complete MARs as well as DRES's responses may be accessed via the OIG's website.¹¹

DRES reviewed the draft of this report prior to publication, and its comments in their entirety follow each OIG recommendation. DRES also inserted comments into the margin of the draft report; the OIG converted these comments into footnotes in order to maintain readability.

Note: The OIG does not correct an agency's grammatical or spelling errors, but does format an agency's responses in order to maintain readability of OIG reports. Such formatting is limited to font size, type, and color, with the following exception: if an agency bolds or underlines text within its response, the OIG preserves these elements of format.

FINDINGS AND RECOMMENDATIONS¹²

During the course of the special evaluation, the OIG made 28 recommendations to DRES to improve the deficiencies noted, establish and implement internal controls, and increase operational effectiveness. Many recommendations focused on improving training and documenting policies and procedures.

Compliance Form for Priority Matter

Employees and the public can enter One Judiciary Square through an eatery without being screened by security personnel at security checkpoints (Page 8). During the inspection, we found that individuals could enter One Judiciary Square through an eatery that is open to the public and can bypass security checkpoints. A door that connects the eatery to the main building allowed entry into the building's rear access hallway without passing through a security checkpoint. Someone could enter the building at the same time an employee exits the eatery, or someone could hold the door open to allow individuals access to the building. After being notified of the problem, PSPD conducted an observation of One Judiciary Square and recommended that DRES restrict access to the rear access hallway from the eatery.

¹⁰ Compliance forms are used when an issue arises during an inspection that requires immediate attention from agency management. It may be a problem of safety, health, or security.

¹¹ See <http://oig.dc.gov>.

¹² DRES inserted the following comment at this point in the draft report: "DRES provides comments in the complete 'Findings and Recommendations' section of this document, not in this portion, the 'Executive Summary'."

EXECUTIVE SUMMARY

Management Alert Reports

Some PSPD officers do not have the necessary protective equipment (Page 10). The “use of force continuum”¹³ consists of seven levels of control an officer must consider when confronting resistance by a subject. These include the use of oleoresin capsicum (OC) spray and non-deadly impact weapon strikes. The last level of control listed is deadly force. Some PSPD officers do not have OC spray, batons, and/or training that would enable them to apply all of the levels of control prior to using deadly force. Consequently, PSPD officers may not be able to protect themselves, District employees, and citizens properly.

Some security posts lack or do not have sufficient post orders (Page 10). Post orders establish policies and procedures for security posts and provide officers with detailed instructions on how to execute tasks at a specific location. Posts at numerous District-owned and -leased facilities do not have official, written post orders. Other locations have post orders that lack key details, such as fire evacuation procedures.

Key Findings

Security contractor allows contraband to pass through security checkpoints at District-owned and -leased buildings and is assessed monetary penalties for these contract violations (Page 14). During the special evaluation, DRES/PSPD had a contract with Hawk One Security Inc. (Hawk One) to provide all trained labor, management, supervision, uniforms, supplies, and equipment necessary for security services at properties owned and leased by the District. PSPD officers conduct contract compliance checks to ensure Hawk One and its officers are in compliance with the agreed contract conditions. Compliance checks conducted by PSPD detected numerous violations of contract requirements by Hawk One officers that resulted in monetary penalties. These contract violations affect PSPD’s operations by limiting its ability to provide a secure work environment, and can pose a security risk if someone enters a building with undetected weapons or other contraband.

Some officers do not have the required training to carry out their job duties (Page 17). PSPD requires that newly-hired officers who are not graduates of a law enforcement academy take an 80-hour block of training that includes firearms training and firing range qualification. All new hires who are academy graduates must receive a 40-hour block of firearms instruction that includes qualifying with the Glock 9 semiautomatic service weapon. In addition, all PSPD officers must complete 40 hours of annual training. However, some PSPD officers stated that they were not receiving the mandatory training, including the training required for authorization to carry a firearm.

¹³ The use of force continuum provides seven levels of control utilized to restrain an individual. Level one is the officer’s presence; level two is verbal commands by the officer; level three is soft empty hand control (physical takedown); level four is use of OC spray (a chemical compound also known as pepper spray that irritates the eyes to cause tears, pain, and even temporary blindness. It is used for riot control, crowd control, and personal self-defense); level five is hard empty hand control (punches and kicks); level six is impact weapon (non-deadly strikes with ASP baton); and level seven is deadly force (firearm use or strike to head with impact weapon).

EXECUTIVE SUMMARY

Some officers are not requalifying with their firearms as required by PSPD policy (Page 19). PSPD policy requires that all officers successfully requalify biannually with their Glock 9 semiautomatic service weapons. Interviews and observations revealed that some officers had not requalified with their weapons biannually. Officers speculated that they were not requalifying with their firearms due to lack of funding and lack of enforcement by management.

Background investigations for officers are not thoroughly documented or vetted (Page 22). PSPD conducts pre-employment background investigations for officer recruits. This includes verifying their credit history, employment history, education history, job references, driving history, domestic history, criminal history,¹⁴ and military history. PSPD is required to send applicants to the Security Officers Management Branch (SOMB) for a formal background check prior to their being hired and commissioned as an officer. Some officer files do not contain documentation showing that a completed background check has been done. According to employees, PSPD does not have policies and procedures to obtain and document results of the background checks from SOMB.

There is a shortage of PSPD officers for daily operations (Page 25). The Government Accountability Office (GAO) *Internal Control Management and Evaluation Tool* (GAO-01-1008G, August 2001) recommends that agencies have “the appropriate number of employees particularly in managerial positions....”¹⁵ Interviewees stated that PSPD does not have adequate staffing to fulfill its mission. Interviewees suggested there are not enough qualified applicants for officer positions because PSPD salaries are not competitive and many applicants are unable to pass background checks. Some officers expressed safety concerns due to lack of staffing, including lack of back-up and understaffed security posts.

Additional Findings

PSPD does not have a current union contract for its officers (Page 30). In March 2008, the Public Employee Relations Board (PERB)¹⁶ found that the collective bargaining agreement between the International Brotherhood of Police Officers Local 445 union and PSPD expired in 1990, and that no contract is currently in effect. Because the parties are following an expired contract, it may be difficult to enforce the terms of the contract if there was a problem of noncompliance and/or issues involving terms and conditions of employment.

Not all officers are disciplined when they violate the District of Columbia Personnel Manual (DPM) (Page 31). PSPD adheres to DPM rules and regulations regarding employee misconduct. Through interviews, the team learned that not all officers are disciplined when they violate the DPM. Multiple interviewees stated that officers are not reprimanded and that favoritism at PSPD contributes to continuous violations of rules and regulations. The lack of

¹⁴ The criminal history check that PSPD conducts is not required by internal policy but is done as a precautionary measure.

¹⁵ <http://www.gao.gov/new.items/d011008g.pdf> (last visited Aug. 23, 2009).

¹⁶ PERB resolves disputes between the District government and labor organizations that represent District agency employees. http://perb.dc.gov/perb/cwp/view,a,3,q,540004,perbNav_GID,1545,perbNav,%7C31999%7C,.asp (last visited Sep. 14, 2009).

EXECUTIVE SUMMARY

discipline at PSPD may inhibit its ability to improve the conduct of its workforce and may result in performance deficiencies.

Officers do not undergo physical examinations every 2 years (Page 33). According to the union contract that PSPD follows, “[a]ll Protective Services Division members will report for a physical examination every two (2) years on the anniversary of their appointment date.” Through interviews, the team learned that officers do not get physical examinations every 2 years. Without periodic physical examinations, PSPD may not be able to determine if employees are physically able to meet job requirements.

Frontline employees find policies and procedures for daily operations insufficient and out-of-date (Page 34). Interviews and observations revealed that PSPD employees believe the policies and procedures for daily operation are deficient and in some instances non-existent. Employees said they follow past practices and industry standards for day-to-day operations. Without written, up-to-date, and complete policies and procedures, inconsistent practices among PSPD employees may occur due to a lack of knowledge.

Additional Areas of Concern

During the team’s initial fieldwork, the OIG found the following areas of concern that are not included in this report as findings because PSPD management addressed them during the inspection:

- security officers were in violation of the District of Columbia Municipal Regulations (DCMR) by not renewing their commissions (licenses) annually;
- daily roll call¹⁷ was not being conducted, hindering communication among officers; and
- supervision was not available for all shifts and posts at District buildings managed by DRES/PSPD.

During the inspection, the majority of PSPD managers and employees were cooperative and responsive. However, DRES senior management was not completely responsive to OIG requests.

Compliance and Follow-Up

The OIG inspection process includes follow-up with DRES on findings and recommendations. Compliance forms were sent to DRES along with this report of inspection. The I&E Division will coordinate with DRES on verifying compliance with recommendations over an established period. In some instances, follow-up inspection activities and additional reports may be required.

¹⁷ Officers present themselves to their supervisor for inspection of their uniforms, weapons, and other equipment. Typically, the roll is called and is followed by a briefing that may include assignments and important notifications.

**Finding and
Recommendations:**

**SUMMARY OF COMPLIANCE FORM
FOR PRIORITY MATTER**

COMPLIANCE FORM FOR PRIORITY MATTER

1. Employees and the public can enter One Judiciary Square through an eatery without being screened by security personnel at security checkpoints.

According to the post orders for One Judiciary Square, officers are required to conduct 100% identification checks of each District employee, contractor, and visitor. Additionally, individuals desiring entry must be screened by a metal detector and must pass their belongings through an x-ray machine.

Observation of One Judiciary Square revealed that individuals can enter the building without passing through security checkpoints by way of an eatery located on the ground level that has a door that opens to a rear access hallway. This rear access hallway leads to a freight elevator that allows an individual to access all floors within the building. Potentially, someone could enter the building as an employee exits the eatery, or someone could hold the door open to allow another individual access to the building.

In March 2009, the OIG issued a Compliance Form to DRES for this finding. (The Compliance Form and DRES's response are at Appendix 2.) DRES managers informed the OIG that PSPD surveyed the site on March 25, 2009, and made the following recommendations:

- restrict access from the corridor to the freight elevators, forcing visitors back out to the lobby (and screening) in order to access floors 1C, 2-11;
- new locks and closers need to be installed to restrict freight elevator access from the north and south rear corridors;
- PSPD will obtain quotes for adding new locks and closers from a security vendor that will complete work within 15 days of delivery of a purchase order; and
- PSPD will work with building management to enforce the proper use of these electronic security measures.

**Findings and
Recommendations:**

**SUMMARIES OF
MANAGEMENT ALERT REPORTS**

SUMMARIES OF MANAGEMENT ALERT REPORTS

1. Some PSPD officers do not have the necessary protective equipment.

According to PSPD General Order (G.O.) No. 2004.016, the “use of force continuum” consists of seven levels of control an officer must consider when confronting resistance by a subject. These levels include the use of OC spray and non-deadly impact weapon strikes. The last level of control listed is deadly force: “Deadly force is any manner of force that is reasonably likely to cause death or serious injury. This includes, but is not limited to, the use of a firearm, [and] striking the head or neck area with an impact weapon.”¹⁸

During interviews, the team learned that some PSPD officers do not have OC spray, batons, and/or training that would enable them to apply all of the “levels of control” defined in PSPD’s general order regarding “Use of Force.” The team directly observed some officers who were carrying a firearm but did not have a baton or OC spray. Officers speculated that they had not been issued OC spray and batons due to PSPD’s inability to provide adequate training prior to issuance of the equipment. According to interviewees, PSPD lacked funding for training. The baton, OC spray, and training on the use of this equipment are, according to PSPD’s policy, designed to mitigate risks to the safety of PSPD officers and individuals conducting business in District-owned or -leased buildings. As a result of the deficiencies noted, PSPD officers may not be able to protect themselves, District employees, and citizens properly and in accordance with the “use of force continuum.”

The OIG issued MAR 09-I-002 to DRES regarding protective equipment deficiencies. In its response, DRES described planned and implemented actions to improve training. DRES also provided a list of its officers, the protective equipment issued to each officer, the dates officers were certified or qualified for each type of protective equipment, and explanations of why some officers did not have certain equipment.¹⁹ The complete MAR as well as DRES’s response may be accessed via the OIG’s website.²⁰

2. Some security posts lack or do not have sufficient post orders.

PSPD G.O. No. 2004.005 states:²¹

Post Orders are used to establish policies and procedures for security post[s] within the responsibility of DRES and as prescribed by the Chief of Protective Services. Post Orders will be developed and drafted by the Assistant Chief of Protective

¹⁸ PSPD G.O. No. 2004.016, Use of Force, at 2-3 (Aug. 3, 2004). We note that the order also contains a chart on page 1 that adds “Conducted Energy Weapon” as an additional level of control.

¹⁹ DRES inserted the following comment at this point in the draft report: “Please see Attachment D for an updated chart of current officers, training, and issuance of equipment.” Attachment D is at Appendix 3 of this report.

²⁰ See

<http://www.oig.dc.gov/news/view2.asp?url=release09%2FOPM%5FProtective%5FServices%5FDiv%2Epdf&mode=iande&archived=0&month=20090>

²¹ DRES inserted the following comment at this point in the draft report: “As part of Chief [REDACTED]’s review of PSPD, he was not able to determine that final and approved copies of General Orders were present, however, many staff were utilizing draft copies. He immediately began creating updated General Orders and policies.”

SUMMARIES OF MANAGEMENT ALERT REPORTS

Services to insure uniform standards in operation for all PSPD security personnel and contract security providers.²²

Post orders are essential because they provide officers with detailed instructions on how to execute daily tasks at a specific location, and help to ensure that standards of operation are consistent not only from 1 day to the next, but throughout the portfolio of properties managed by DRES. According to facilities management best practices, “[s]ecurity procedures should anticipate potential problems and vulnerabilities and present detailed, planned responses.”²³

Hawk One and PSPD officers at numerous District-owned and -leased facilities, including the building that houses Metropolitan Police Department (MPD) headquarters,²⁴ execute their duties without official, written post orders. In addition, the team observed that some PSPD post orders were inadequately detailed. For example, the post orders for 441 4th St, N.W., 1350 Pennsylvania Ave., N.W., 2000 14th St., N.W., and 2700 Martin Luther King Jr. Ave., S.E. lacked a building plan, fire evacuation procedures, and a 24-hour emergency contact list to allow an officer working the post to alert individuals within the building in case of an emergency. The lack of adequate post orders may present safety and liability risks.

The OIG issued MAR 09-I-003 to DRES regarding post order deficiencies. In its response, DRES stated that it reviewed all post orders and developed post orders for locations that lacked complete post orders. DRES also stated that it will review post orders annually to ensure they remain current.²⁵ The complete MAR as well as DRES’s response may be accessed via the OIG’s website.²⁶

²² PSD G.O. No. 2004.005 § V.5 (Aug. 3, 2004). The team noted that PSD G.O. No. 2004.005 does not indicate that all security posts should have written post orders.

²³ FMLink, Facilities Management Resources How To 2, *available at* <http://www.fmlink.com/ProfResources/HowTo/article.cgi?BOMI%20International:howto0306.html> (last visited Dec. 9, 2008).

²⁴ In 1994, four people, including a MPD police sergeant and two FBI agents, were killed when a gunman entered MPD headquarters at 300 Indiana Ave., N.W.

²⁵ DRES inserted the following comment at this point in the draft report: “Please see Attachment F for an updated chart on Posts, Post Orders, and Review of Post Orders.” Attachment F is at Appendix 3 of this report.

²⁶ *See* <http://www.oig.dc.gov/news/view2.asp?url=release09%2FFinal%2DDistribution%2DLetter%2Dfor%2DLack%2Dof%2DPost%2DOrders%2DMAR3%5F6%2Epdf&mode=iande&archived=0&month=20092>.

SUMMARIES OF MANAGEMENT ALERT REPORTS

**Findings and
Recommendations:
KEY FINDINGS**

KEY FINDINGS

1. Security contractor allows contraband to pass through security checkpoints at District-owned and -leased buildings and is assessed monetary penalties for these contract violations.

- a) *Hawk One, Inc. security company fails to provide appropriate security services resulting in monetary penalties.*

During the inspection, DRES/PSPD had a contract with the Hawk One, Inc. security company “to provide all trained labor, management, supervision, uniforms, supplies[,] and equipment necessary” to render security services at District-owned and -leased properties. Contract No. POAM-2004-D-0015-DW City-Wide Security Services governed the provision of these services. Section E.2 of the contract, entitled “Inspection and Acceptance,” states that “PSPD shall conduct random inspections of the facilities to ensure contract compliance.” The contract sets precise amounts for indebtedness and/or damages for noncompliance with contract terms when Hawk One officers staff posts.

Section H.8, entitled “Liquidated Damages,” states:

Each time the contractor fails to provide the required productive man hours, supervisory hours, equipment and uniforms as specified in the solicitation, the [Contracting Officer’s Technical Representative] shall consider the post uncovered and the District shall deduct from monies due the contractor:

- \$19.00 for each minute to twenty-nine (29) minutes that a post is not covered; and
- \$35.00 total for the remaining 31 minutes and each additional hour thereafter (\$35.00 an hour is the overtime cost for Protective Services Personnel to cover a post).

The team requested and reviewed a list of monetary penalties resulting from compliance inspections on Hawk One officers from January 2008 to February 2009 and determined that high dollar amounts were deducted for multiple months in 2008 for contractor noncompliance. For example, in January 2008, deductions reached \$21,940, and in November 2008, deductions reached \$23,021 for contractor noncompliance. In every month of 2008 except March, August, and December, liquidations exceeded \$10,000. In 2008, a total of \$166,026 was deducted from the contract for noncompliance, and the monthly average was \$13,835. In January 2009, alone there were deductions of \$20,867 for noncompliance. To determine why liquidation amounts were high, the team requested and analyzed the monetary adjustment reports, which are used to record noncompliance by the contractor. The analysis of that data (January/2008 - February/2009) revealed the following:

- 81 times a Hawk One officer was not on duty;
- 36 times a Hawk One officer was not on time;
- 30 times a Hawk One officer reported for duty without a weapon;
- 25 times a Hawk One officer abandoned his/her post; and

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- 14 times a Hawk One officer reported for duty without ammunition.

b) Hawk One officers failed to detect and seize contraband during security checks at District-owned and -leased buildings.

In addition to random inspections of facilities to ensure contract compliance, PSPD officers conduct security checks to see if they can transport contraband²⁷ past Hawk One officers at security posts and into a building. PSPD conducts these checks at a minimum of three times a month. According to employees, PSPD officers were able to pass through the checkpoints with weapons for all the security checks conducted in February 2009. For example, an undercover PSPD officer entered 1350 Pennsylvania Ave., N.W. with a plastic handgun with a metal clip. When the metal detector sounded, Hawk One officers did not take action, and the undercover PSPD officer entered the building with the contraband. On another occasion, an undercover PSPD officer entered 441 4th St., N.W. with a knife in each shoe. When the metal detector sounded, the Hawk One officer did not take any action, and the undercover PSPD officer entered the building with the contraband.

Through interviews and observations, the team learned that Hawk One officers regularly violate the rules and regulations set forth in the contract agreement with PSPD. The high monetary values deducted for liquidated damages and the number of times contraband is undetected by Hawk One officers reflect frequent contractual noncompliance. According to employees, some Hawk One officers need training. One PSPD officer stated, “We were paying for security services and they just provided a warm body.” This officer further stated, “With these repeated failures of Hawk One, it’s a breach of contract. There was an instance where one of our Hawk One officers was praying and put the loaded gun in a desk while . . . doing this. That is considered being out of uniform and not in compliance.”

PSPD’s overall operations and ability to ensure safety may be adversely affected by Hawk One’s lack of compliance with duties and responsibilities outlined in the contract. For example, when Hawk One officers arrive for duty without ammunition, they are not equipped to ensure the safety of individuals within a building. When Hawk One officers do not abide by contract rules and regulations, they may jeopardize the safety of visitors and employees in government-owned and -leased properties under the control of DRES/PSPD. Furthermore, negative working relationships could develop between PSPD and Hawk One officers because officers rely on each other for assistance and an ill-equipped or absent Hawk One officer cannot provide assistance as needed. Finally, these continuous contract violations may be indicative of a pattern or practice that could lead to additional monetary penalties, government liability, and/or reputational damage for PSPD. According to a PSPD manager, Hawk One’s contract expired with DRES/PSPD in September 2009 and a new security company was awarded the contract.

²⁷ A PSPD manager described contraband as expired D.C. identification, handguns, weapons (knives), explosives, and false law enforcement credentials.

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Recommendations:

- (1) That the Director of the Department of Real Estate Services (D/DRES) seek to increase monetary penalties for noncompliance by contractors.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, as Received:

Enhanced monetary penalties may motivate contractors to better comply with contractual obligations. During FY2009 the Citywide Security Services Contract, for which Hawk One was the sole contractor during the Evaluation, was re-competed. During the preparation for this solicitation, DRES attempted to include monetary penalties that corresponded with the potential loss that can be incurred by DRES and the District if the contractor fails to meet said obligations. However, during legal sufficiency review, the Office of Contracting and Procurement disallowed DRES from including such provisions. While they did allow penalties to be imposed, the penalties are less severe than those included in the former contract with Hawk One. The new contracts do include requirements for training and performance that meet and exceed industry standards. PSPD's new management structure includes a Commander dedicated to ensuring contract compliance by the new vendors and thus ensuring the safety and security of District employees and visitors to our District-owned and -leased buildings. PSPD continues to perform penetration tests with the vendors, review training plans and documentation, as well as conduct regular meetings with the vendors. The current vendors are providing higher quality service and in spite of the lesser financial penalties included in the contract, they are meeting their contractual obligations.

- (2) That the D/DRES consider hiring more PSPD officers to replace contract officers.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

Additional full-time employees (FTE) within the PSPD would allow a reduction in contract security guards and enhance PSPD's ability to train, monitor, and ensure performance of post orders. PSPD currently functions within the FTE authorization provided in the budget. As discussed in the Report, PSPD currently has vacancies for which we are recruiting. When these vacancies are filled, an evaluation by PSPD management will be conducted to determine if FTEs can be substituted for contract security guards while meeting the daily operating requirements of PSPD. It should also be noted that under the current contracts with vendors, adherence to training and performance standards has increased and contractors are meeting or exceeding the requirements included in the contract.

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2. Some officers do not have the required training to carry out their job duties.

PSPD requires that officers demonstrate proficiency in all aspects of firearm use and safety. PSPD G.O. No. 2004.015 § V(A) provides:

New hires will receive a 40 hour block of instruction by a qualified firearm instructor and range-fire qualify with the Glock 9MM semiautomatic pistol and [be] appropriate[ly] license[d] by the Special Officer's Management Branch prior to being authorized to carry the standard issued weapon.

PSPD's internal policies further provide the following:

Newly hired personnel who have not graduated from a law enforcement training program will attend an 80 hour block of instruction to include firearm safety, handgun features and characteristics, sight alignment, breathing, trigger-pull and proper grip techniques, cleaning, use of force policy, weapon clearing, range qualification and Range 3000[²⁸] Simulated Firearm Training Program.²⁹

In addition, D.C. Protective Services Police Training and Intelligence Branch Standard Operating Procedure and Policy states the training commander will:

- coordinate the planning, development, and presentation of all in-house training programs and evaluate and approve requests to attend outside training courses so that the department's goals of ... 40 hours of annual training for department sworn personnel, and Basic Police Orientation are met³⁰

Through interviews the team learned that officers were not receiving the aforementioned mandatory training. For example, some officers stated that they did not receive the full 40 hours of annual training that is required prior to being authorized to carry a standard issued weapon and some said they did not receive the full 80 hours of instruction that is required of personnel who have not graduated from a law enforcement training academy. As one officer stated: "I didn't receive the complete 40 hours of training. I guess they thought all the training that I had was enough. I did 4 or 5 hours in class for 3 days and 4 or 5 hours on the range for 2 days." Another officer stated: "I haven't received in-service training in 5 years. We need in-service training to be up-to-date [and] current in regard[] to policing and the security field in general."

²⁸ A use-of-force training simulator that will allow law enforcement officers to encounter realistic scenarios in a safe, controlled environment. [Http://findarticles.com/p/articles/mi_m0EIN/is_2003_July_14/ai_105377218/](http://findarticles.com/p/articles/mi_m0EIN/is_2003_July_14/ai_105377218/) (last visited Sep. 14, 2009).

²⁹ Protective Services Police Authority and Responsibilities, Chapter III, § 1(H).

³⁰ *Id.* §102.02 (A) (1).

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According to PSPD officers, they could not attend training because PSPD was unable to staff the officers' posts in their absence. As one officer stated: "They haven't slotted me for training because we don't have the staffing to backfill the positions for training, and I never was able to attend." Another employee said that previous managers thought it was more important to have posts filled than to send officers to training. According to this employee, "Only 15 officers went to in-service training in 2007." Additionally, officers speculated that funding was not available for training. Several officers stated that training had been put on hold because of the FOX 5 News exposé that alleged improprieties amongst the training staff.³¹

In September 2008, the team reviewed PSPD training records and found insufficient documentation that officers had received the required hours of training.³² Some folders had in-service training certificates from 2007, but there were none for 2008. Some of the folders did not include proof that officers completed 40 hours of annual law enforcement/refresher training required by PSPD regulations. The team was unable to determine what training and how many hours of training officers had completed due to the lack of documentation. According to employees, the person in charge of training records locked the records in an office, and when they were retrieved after the employee's separation from D.C. government employment, some of the records were missing certificates and proof of training.

Officers without the required hours of training are noncompliant with agency policy and industry standards. According to best practices, "[c]ontinued law enforcement education will enable an officer to perform more efficiently and more safely, and is essential in limiting liability in civil actions arising from officer's activities."³³ The lack of required training for all officers limits PSPD's ability to ensure the safety and protection of officers and the public. Furthermore, PSPD is not reducing the risk of criminal and civil liability that could arise from incidents that raise questions of competency, training, and standards.³⁴

Recommendations:

- (1) That the D/DRES ensure that all officers receive the required annual law enforcement and annual training needed to fulfill their job responsibilities and document all training in personnel files.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

All employees, including PSPD officers must be provided the required training to fulfill their job responsibilities and we further believe that ensuring adequate training is the

³¹ FOX 5 News conducted an investigation in March 2008 into allegations concerning PSPD's operations and improprieties.

³² DRES inserted the following comment at this point in the draft report: "Chief [REDACTED] and PSPD management were unable to locate many training records and much documentation was incomplete at the time of Chief [REDACTED]'s hire."

³³ [Http://www.state.nj.us/oag/dcj/agguide/mandator.pdf](http://www.state.nj.us/oag/dcj/agguide/mandator.pdf) (last visited Nov. 23, 2009).

³⁴ See PSD G.O. No. 2004.015 § IV.

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responsibility of not only the employer, but the employee and labor union as well. Training within PSPD was determined to be inconsistent by Chief [REDACTED]. He immediately initiated a project to research and document all training that had been taken by officers. A basic orientation to PSPD was developed and is being provided for all new officers. Attachment B provides the training plan for the forty (40) hour Basic Orientation. A curriculum for In-Service training has also been documented, is currently being utilized, and is updated on a regular basis. Attachment C provides the training plan for the forty (40) hour In-Service training. In-service training is required on an annual basis. Additionally, the Chief and his management team documented training processes to ensure consistency and provide for tracking for PSPD officers' training. During the Evaluation, the OIG released MAR 09-I-002 to which DRES responded to issues presented by the OIG. Attachment D of this response provides an updated matrix to that provided in response to the MAR. PSPD management meets monthly with the labor union (Fraternal Order of Police) to discuss working conditions including training opportunities and needs. Additionally, PSPD provides training during Roll Call meetings at the beginning of each shift.

OIG Response: **DRES Attachments B, C, and D are at Appendix 3 of this report.**

- (2) That the D/DRES develop a control mechanism that tracks officers' training hours and notifies managers and officers when training is required.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES agrees that control mechanisms need to be in place for training and such control mechanisms have been implemented. Chief [REDACTED] and the management team conducted an analysis of completed training by officers, requirements for a comprehensive training curriculum, as well as an efficient method of comparing completed training with requirements. The training program as a whole was evaluated by management and new training staff was placed within the training division to ensure proper documentation and program control. Training folders were created and all officers submitted training forms for courses/training completed and for all training completed subsequent to that time has been documented; the PSPD training staff includes documentation in the officer's training folder. Training staff is also completing the file structure and forms for electronic storage in the training software. In late FY09, PSPD procured the training software, Crowne Point, to automate processes that document, track, monitor, and generate notifications for officer training. This system provides for electronic storage of training documentation and automated tracking and notifications for training expirations and renewals. Crowne Point has provided PSPD with the automation it needed to provide, monitor, and report on officer training.

3. Some officers are not requalifying with their firearms as required by PSPD policy.

In accordance with department policy, PSPD "assures the safety and protection of its officers and the public, and serves to reduce the probability of criminal and civil liability that could arise from questions of competency, training and standards by requiring all officers to

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demonstrate reasonable proficiency in all aspects of firearm use and safety.”³⁵ To implement this policy, PSPD G.O. 2004.015 § V (C) (a) requires all officers to successfully requalify twice annually with a Glock 9 semiautomatic service weapon. Further, “[e]ach [requalification] consist[s] of two successful shootings of 52 rounds each in which the officer will have demonstrated the ability to hit the torso of a silhouetted target a minimum of 80% of the 52 rounds, each session.”³⁶

Through interviews and observations, the team learned that PSPD was not adhering to this policy. Some officers stated that they had not requalified with their weapons biannually. One PSPD employee said, “There are people that [sic] don’t have biannual training with their weapon. They don’t have the biannual training because they don’t do it. Nobody is enforcing it. There is no biannual tracking system for biannual certification.” Observations of PSPD firearms records confirmed that not all PSPD officers were requalifying with their Glock 9 semiautomatic service weapons twice annually as required by policy.

The team reviewed 58 firearm records³⁷ for PSPD officers, of which 45 indicated that firearm requalification was overdue. Two records did not have dates when the individual completed weapons requalification, and two other records were incomplete. The remaining nine records indicated that the officer’s respective requalification status was current. The team followed up with the training staff in February 2009 and learned that 13 individuals had not requalified with their weapons and were in the process of becoming requalified as soon as possible.³⁸ According to employees, officers who do not requalify with their weapons are placed on unarmed status.

PSPD officers and employees cited multiple reasons why PSPD officers were not requalifying with their firearms. According to some officers, the firearms training staff was told not to conduct requalifications because of the FOX 5 News allegations of improprieties at PSPD. Officers and employees also stated although PSPD was not adhering to its internal policy of requalifying twice a year, the agency was following the external policy of SOMB that requires officers to qualify with their firearms once a year. Finally, multiple officers stated that training instructors were not ensuring that officers are scheduled for firearms requalification, and there is no tracking system to ensure biannual firearms requalification.

PSPD is noncompliant with its internal policies and procedures regarding biannual firearms requalification, and officers are not demonstrating reasonable proficiency in all aspects of firearm use and safety. Consequently, PSPD may be jeopardizing the safety of its officers, District employees, and citizens conducting business in District-owned and -leased properties.

³⁵ PSD G.O. No. 2004.015 § IV.

³⁶ *Id.* at § V (C)(b).

³⁷ DRES inserted the following comment at this point in the draft report: “Training files, inclusive of firearms training records were incomplete or could not be located by Chief ██████ upon his hire. Currently firearms training information is included in the officer’s training folders and in the training software, Crowne Point.”

³⁸ DRES inserted the following comment at this point in the draft report: “As part of Chief ██████’s assessment when hired, he recognized the lack of qualification records and revoked officer weapons until which time they were able to qualify or provide proof of qualification.”

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Moreover, this deficiency may be increasing the risk of criminal and civil liability that could arise if an unqualified officer uses his/her firearm.³⁹

Recommendations:

- (1) That the D/DRES ensure that officers requalify twice annually with their firearms, and document all training in personnel files.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES agrees with, and is now meeting this standard. During Chief ██████'s review of training as a whole, inconsistencies were noticed in the documentation and recurrence of firearms qualifications. The Report is correct that some officers were qualifying once per year and other officers were qualifying twice per year. In spite of the lack of and inaccuracy of training records, PSPD remained legally compliant with the Security Officer's Management Branch (SOMB) requirements that officers qualify once per year in tandem with the officer Commissioning. Enhancements to the training program made by Chief ██████ include reassignment of personnel formerly in the training division to other positions, placement of highly qualified officers within the training program to ensure a quality curriculum and training methods, and the adoption of the Metropolitan Police Department (MPD) standards for quality and frequency of qualification. These new standards have been in place for almost a year. Currently, officers are required to qualify twice per year and receive additional training if the officer does not qualify. Officers who do not qualify with their weapon are moved to non-contact positions and following remedial training will be removed from their position if they fail to qualify. Attachment E includes the curriculum information for the 80 (eighty) hours of weapons training required for new employees with no prior Police Academy or law enforcement experience. New employees with prior Police Academy or law enforcement experience are required to take 40 (forty) hours of weapons training. Additionally, any employee, new or existing, who fails to qualify with their weapon as part of the initial weapons training will be placed in a remedial course for an additional 40 (forty) hours and attempt qualification again at the end of the qualification. If the officer does not qualify following remedial training, the officer will be placed in an additional 40 (forty) hours of remedial training and again attempt requalification. If the officer does not qualify following the second remedial training, adverse personnel action will be pursued based on the officer not being able to fulfill required responsibilities of the position. Attachment C includes information on officer qualification dates and status for weapon issuance.

OIG Response: DRES Attachments C and E are at Appendix 3 of this report.

- (2) That the D/DRES develop a tracking system that alerts managers and officers when they are required to requalify with their weapons.

³⁹ See PSD G.O. No. 2004.015 § IV.

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Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES agrees with, and is now meeting this standard. As discussed in the DRES Response to Finding #2, the Crowne Point software is currently being utilized by PSPD to monitor, track, and automate training, inclusive of weapons qualifications.

4. Background investigations for officers are not thoroughly documented or vetted.

- a) Some officers' files do not have complete background investigation checklists and background investigation questionnaires, and/or some files are missing background check supporting documentation.*

The GAO *Internal Control Management and Evaluation Tool* (GAO-01-1008G, August 2001) recommends that internal control and all transactions and other significant events are clearly documented. Further, “[d]ocumentation of transactions and other significant events [should be] complete and accurate and facilitates tracing the transaction or event and related information from authorization and initiation, through its processing, to after it is completed.”⁴⁰ PSPD conducts pre-employment background investigations of applicants for open officer positions that include verifying their credit history, employment history, education, job references, driving record, domestic violence history, criminal history, and military history. PSPD uses a background investigation checklist and a background investigation questionnaire to record this information. In addition, applicants are required to go to MPD’s Security Officers Management Branch (SOMB) for a national criminal history check prior to employment.

Through interviews and observations, the team learned that PSPD personnel did not complete the pre-employment background investigation checklists and questionnaires for all officers. The team reviewed 82 officer personnel folders and observed that the background investigation checklist and the background investigation questionnaires were either incomplete or missing. Of the 82 folders, only 13 had all of the required documentation requested by PSPD to complete the pre-employment background investigation questionnaires and background investigation checklists. Twenty-three of the personnel folders represented employees who had transferred from another employer/agency and lacked both a background investigation questionnaire and a background investigation checklist.⁴¹ The remaining 46 personnel folders did not contain all of the required documentation required by PSPD to complete the pre-employment background check questionnaire and checklist.

Through interviews, the team was informed that PSPD background investigators were not following up with the applicants to obtain the required documentation and information needed

⁴⁰ *Id.* at 43.

⁴¹ These employees were officers who had a long tenure at PSPD and transferred to PSPD prior to the use of the background investigation questionnaire and a background investigation checklist that PSPD utilized during the inspection.

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for the pre-employment checks.⁴² In addition, background investigators did not insert all documentation received to update the applicants' folders.

Without complete and accurate documentation of background investigations for officers, PSPD does not have required information for current or potential employees. A less than thorough background check may result in hiring an officer who does not meet the standards required to be a PSPD officer. Furthermore, PSPD may incur costs associated with termination proceedings against unqualified or unsuitable employees (e.g., recruitment, hiring, and training costs). Finally, incomplete or inaccurate documentation of background investigations increases the Districts' liability because PSPD may be unable to prove it did not breach its duty to select and retain competent and safe officers.

b) There are no written policies and procedures for obtaining and reviewing background checks from SOMB.

The Enhanced Professional Security Amendment Act of 2006 (L16-0187) amended Section 11.11:1 of The Manual of the Metropolitan Police Department of the District of Columbia to read as follows: "No person shall be commissioned or employed as a special police officer, nor shall an existing special police officer have a commission renewed, until the Mayor has conducted a criminal history check of the applicant through the record systems of the Federal Bureau of Investigation and the Metropolitan Police Department." SOMB obtains an applicant's fingerprint and checks the National Crime Information Center (NCIC) as well as the Washington Area Law Enforcement System (WALEs) for the criminal history of an applicant. Upon approval of his/her criminal history check, the applicant receives a commission.

The team learned that PSPD was not sending all officer recruits to SOMB for a formal criminal history check prior to employment.⁴³ According to employees, the last group of PSPD officer recruits went to SOMB for a criminal background check after classroom and firearms training.⁴⁴ The team was informed that, historically, PSPD hired applicants as officers and sent them to MPD's training academy before the applicant went to SOMB for a criminal history check.⁴⁵ As one DRES employee opined: "It is a waste of manpower, uniform money, equipment money, training money, and time when we do not send an applicant to SOMB to be cleared and receive their commission before training."

According to PSPD employees, this policy was reversed in June 2009. However, one employee referred to the new process as a "work in progress," and there are no policies and procedures that specifically state that new hires should obtain a background check from SOMB

⁴² DRES inserted the following comment at this point in the draft report: "It should be noted that submission of background documentation is required as part of the application process. Failure by applicants to submit information will remove them from consideration for hire. This requirement is included in the PSPD hiring process checklist."

⁴³ DRES inserted the following comment at this point in the draft report: "All PSPD applicants now go to SOMB for background checks as a final step in the selection/screening process, prior to hire."

⁴⁴ This group of recruits went to training in February and March of 2009.

⁴⁵ DRES inserted the following comment at this point in the draft report: "All PSPD applicants now go to SOMB for background checks as a step in the selection/screening process, prior to hire or attending training."

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before attending training. In addition, there are no policies and procedures for obtaining and reviewing the results of the criminal background checks conducted by SOMB. According to managers, SOMB retains copies of the background investigation results, and if there is a problem involving an applicant's background, SOMB forwards the background check results to PSPD. Furthermore, as one manager stated, "If personnel are cleared, [PSPD is] notified via email." Management said that results of the background checks are sent to the Chief of PSPD or the Training Commander for review. However, according to employees, no documentation of the results of background investigations are given to background investigators; instead, they are verbally informed of the results. When background investigators do not receive documentation of background investigation results from SOMB, they are unable to thoroughly assess an officer recruit's qualifications and suitability for employment. As one employee commented, "[t]hat information should be forwarded to the background investigators to be included in the applicant's background investigation report for review by management."

The lack of written policies and procedures for obtaining background check results from SOMB prior to training may result in inconsistent implementation of the policy. Furthermore, the lack of policies and procedures for obtaining and reviewing background investigation results may result in incomplete background documentation. Without documentation of the results of the criminal background checks from SOMB, PSPD background investigators are not able to include this information in their background review process or document it in officers' personnel files. Consequently, PSPD may not effectively determine whether an applicant for an officer position has a criminal history that would prevent him/her from becoming an officer.

Recommendations:

- (1) That the D/DRES collaborate with SOMB to develop and implement written policies and procedures for conducting background checks prior to employment.

Agree _____ Disagree X

DRES's April 2010 Response to Recommendation, As Received:

DRES has implemented a procedures checklist for the PSPD hiring process that is utilized by PSPD and HR. The documented internal procedure is used for the complete hiring process that includes both the SOMB and PSPD conducted background checks. As a quality assurance measure, the HR staff reviews the selected applicant's hiring package and verifies the hiring process was adhered to including the dual background checks. Based on this documented process DRES believes the intent of this recommendation is met.

- (2) That the D/DRES develop a plan for disseminating the results of the background checks to appropriate PSPD personnel for review.

Agree X Disagree _____

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DRES's April 2010 Response to Recommendation, As Received:

As a segment of the procedures that will be documented, as indicated in the DRES response to Recommendation #1; PSPD will ensure that results of background checks conducted by PSPD, as well as the background check conducted by SOMB, are included as part of the decision criteria for the hiring process and the documentation from the background checks is including in the confidential folders associate with the Merit Case Folders. Results of backgrounds for applicants hired by PSPD will be included in their personnel folders.

- (3) That the D/DRES ensure that background check results are in all officers' personnel files.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

Background information is included in all personnel folders for hires made under current management. Backgrounds are reviewed both for officers and civilian staff in PSPD. Backgrounds for employees hired prior to the fourth quarter of FY09, may not be contained in the personnel folders. However, background checks were completed prior to hire by PSPD and a second check was conducted by SOMB. Additionally, criminal backgrounds for officers are reviewed on an annual basis at the time of Commission renewal with SOMB.

5. There is a shortage of PSPD officers for daily operations.

The GAO *Internal Control Management and Evaluation Tool* (GAO-01-1008G, August 2001) recommends as a best practice that agencies have “the appropriate number of employees [so that] ... [e]mployees do not have to work excessive overtime or outside the ordinary workweek to complete assigned tasks....”⁴⁶

Interviewees stated that PSPD does not have adequate staffing to fulfill its mission due to vacant positions and the need for more full-time equivalent (FTE) positions. A PSPD official indicated in November 2009⁴⁷ that out of 115 FTE positions, 89 were filled and 26 were unfilled. This official stated, “PSPD needs more personnel to adequately perform the functions that DRES wants” and believes that PSPD needs an additional 15 FTEs to bring the agency to a total of 130 positions because of the increase in responsibilities delegated to the agency by the Mayor and the Homeland Security and Emergency Management Agency (HSEMA). With 26 unfilled positions and a need for 15 additional FTEs, there is a possible need for 41 additional employees.⁴⁸ Interviewees stated that PSPD uses overtime in response to staffing shortages, and they are

⁴⁶ *Id.* at 16.

⁴⁷ DRES inserted the following comment at this point in the draft report: “DRES is unclear if this is the correct date reference as the evaluation was concluded in June 2009.”

⁴⁸ A PSPD senior official did not know whether PSPD has conducted an analysis to determine the exact number of FTEs PSPD requires.

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overworked.⁴⁹

According to interviewees, there are not enough qualified applicants for PSPD officer positions because PSPD salaries are not competitive and because many applicants are unable to pass background checks.⁵⁰ Some interviewees cited turnover due to retirements as well as voluntary and involuntary terminations as factors in the staffing shortage. A senior official stated that at one point there was a lack of desire to work at PSPD because of the working conditions (e.g., lack of respect and leadership issues).

Some interviewees cited officer safety as a concern due to insufficient staffing. For example, one interviewee stated that staffing shortages prevent a supervisor at one building from providing backup to an officer at another building for assault calls. Other concerns include assigning one officer to a post (instead of three), assigning one officer on a shift (instead of two), and assigning no officers to certain posts.⁵¹ One interviewee stated that PSPD does not have adequate staff to send officers to training because it is unable to fill the posts of the officers attending training.

Inadequate staffing may limit PSPD's ability to ensure the safety of officers, District employees, and the public. For example, the District may be liable if an officer, employee, or citizen conducting business in a District-owned or -leased building is injured in an altercation due to the lack of officer support. Furthermore, inadequate staffing may hinder PSPD's ability to safeguard District government assets.

Recommendations:

- (1) That the D/DRES conduct a staffing analysis of all PSPD posts and shifts to determine the level of staffing required to fulfill PSPD's mission.

Agree X Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES conducts ongoing reviews of the mission of our Divisions as well as the details associated with daily responsibilities and the staffing structure required to meet those goals.

⁴⁹ DRES inserted the following comment at this point in the draft report: "While PSPD utilizes some overtime to cover vacant shifts due to absences, a significant amount of overtime is due to special events and non-recurring, unplanned activities assigned to PSPD."

⁵⁰ DRES inserted the following comment at this point in the draft report: "It is factual that approximately 5% of applicants pass background screening requirements. Also, DCHR is currently conducting a Classification and Compensation Reform project that may lead to changes in position requirements and compensation for PSPD positions." The OIG confirmed with DRES that this statistic is accurate. According to a DRES official, the 5% pass rate has a negative impact on DRES's ability to hire officers timely.

⁵¹ DRES inserted the following comment at this point in the draft report: "The number of officers assigned to posts are based on security assessments of the post, facility, and programs included at the location. Historically many posts were overstaffed, thus wasting District resources. Additionally, with the inclusion of automated security systems, a reduction in contract security officers may be realized."

KEY FINDINGS

- (2) That the D/DRES hire personnel to adequately staff all posts at District-owned and -leased buildings managed by DRES.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES is conducting recruitment activities to fill PSPD vacancies. As discussed in the draft Report, applicants must successfully complete background screenings, which reduces the number of available applicants. While DRES receives a large number of applications in response to vacancy announcements, many applicants are not determined to be qualified during the rating and ranking of applications, and as one of the final steps in the recruitment process, many applicants do not successfully compete the background screening. While there are no unmanned posts due to the current vacancy rate, DRES understands the need to fill vacancies and fully staff PSPD to reduce overtime and continue maintaining officer safety.

KEY FINDINGS

**Findings and
Recommendations:**

ADDITIONAL FINDINGS

FINDINGS AND RECOMMENDATIONS

6. PSPD does not have a current union contract for its officers.

The International Brotherhood of Police Officers Local 445 union contract for PSPD officers provides, “This Agreement shall remain in full force and effect until September 30, 1990.”⁵² According to a union representative, the contract has not been updated since its implementation in 1988 and expiration in 1990. The expired contract contains provisions governing the terms and conditions of employment, such as the disciplinary process and the requirement that PSPD officers receive physical examinations every 2 years. This interviewee also stated that PSPD management and the union could not agree on parts of a new contract, so the contract was never finalized. In March 2008, the Public Employee Relations Board (PERB)⁵³ found that the collective bargaining agreement between the union and the agency expired in 1990, and that no contract was in effect. According to a union representative, PSPD officers were told to continue following the expired contract. In October 2008, the Fraternal Order of Police was certified as PSPD’s new union and a new contract is under negotiation. In February 2009, a senior PSPD official stated that the expired contract is still in effect and PSPD continues to operate under its terms and conditions. According to a PERB official, PSPD can operate under an expired contract, but the contract must reflect current terms and conditions of employment; however, the expired contract under which PSPD operates does not.

Because the parties are following an expired contract, it may be difficult to enforce the terms of the contract if there is a problem of noncompliance. In addition, the expired contract may not adequately address officers’ current work practices. For example, the contract states that PSPD shall provide officers with .38 revolvers, but officers currently carry Glock 9 semiautomatic service weapons.

Recommendations:

- (1) That the D/DRES work with union representatives to expeditiously finalize a new contract.

Agree X Disagree _____

DRES’s April 2010 Response to Recommendation, As Received:

DRES is currently working with the Office of Labor Relations and Collective Bargaining (OLRCB) regarding contract negotiations with FOP. All labor contracts are negotiated through OLRCB. Since Chief ██████’s hire with PSPD he has been actively working with the unions, formerly IBPO and currently FOP to initiate negotiations and finalize a contract. Until a new contract is finalized, the existing contract will be followed. Additionally, PSPD meets at least monthly with FOP to discuss issues and initiatives to ensure that open communication exists between labor and management.

⁵² Agreement between International Brotherhood of Police Officers Local 445 and the Government of the District of Columbia Department of Administrative Services, Article 30, § A.

⁵³ PERB resolves disputes between the District government and labor organizations that represent District agency employees.

FINDINGS AND RECOMMENDATIONS

- (2) That the D/DRES consider partnering with MPD's collective bargaining efforts or using MPD's agreement as guidance in renewing efforts to bring about a new contract.

Agree _____ Disagree _____ **X**

DRES's April 2010 Response to Recommendation, As Received:

DRES is in communication with MPD regarding the existing MPD contract, contract negotiations, and other labor matters to assist in ensuring professional and more consistent handling of actions for PSPD. PSPD has reviewed MPD's contract as guidance to move forward with PSPD's negotiations with FOP. However, while the FOP represents officers for both MPD and PSPD officers, the missions of each organization are different and hence contracts will require different requirements. It should also be noted that we are not legally permitted to simply adopt their agreement. Therefore, it will not be beneficial for the two Agencies to partner and negotiate one contract to serve both.

7. Not all officers are disciplined when they violate the District of Columbia Personnel Manual (DPM).

PSPD adheres to the DPM for rules and regulations regarding disciplinary actions. DPM § 1603.3(f) defines cause for disciplinary action to include the following:

Any on-duty or employment-related act or omission that interferes with the efficiency and integrity of government operations, to include:

- (1) Unauthorized absence;
- (2) Absence without official leave;
- (3) Neglect of duty;
- (4) Insubordination;
- (5) Incompetence;
- (6) Misfeasance;
- (7) Malfeasance;
- (8) Unreasonable failure to assist a fellow government employee in carrying out assigned duties; [and]
- (9) Unreasonable failure to give assistance to the public.

The job description for PSPD supervisory personnel requires them to prepare a written report and forward it to a higher authority for action when disciplinary measures must be taken against an officer.

The team learned through interviews that not all officers are disciplined when they violate the DPM. One officer stated that "[t]here is a lot of insubordination by officer's [including] yelling and screaming and a lot of disrespect. This happens because subordinates know there is no immediate discipline." Another officer said: "We have [employees] that have been AWOL [Absent Without Leave] multiple times and nothing happens to them."

FINDINGS AND RECOMMENDATIONS

DRES's April 2010 Response to Recommendation, As Received:

Periodic training is provided for all managers within DRES. Due to the turnover and the number of new manager hires, DRES will conduct an additional training on the DPM, Chapters 14 (Performance Management) and 16 (General Discipline) as well as the Collective Bargaining Agreement (CBA). DRES HR provides ad hoc training and feedback to supervisors who consult with them for discipline guidance. In addition, all Management Supervisory Service (MSS) managers are required to complete various training through the DCHR, inclusive of training on the disciplinary process.

- (3) That the D/DRES ensure that disciplinary actions are appropriately documented and consistently enforced.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

DRES agrees that all disciplinary actions must be well documented, fair, and consistently enforced. In addition to enhanced training and the review of all actions by the Chief, all proposed corrective and adverse actions, excluding verbal and written warnings, are reviewed by HR for fairness and consistency with similar violations. HR assists in drafting proposal letters, documenting performance, in identifying hearing officers and deciding officials when required, and they will monitor the process for consistency with Chapter 16 of the DPM as well as the CBA. Additionally, HR provides ad hoc guidance to managers and supervisors when HR is consulted and/or when the need is identified.

8. Officers do not undergo physical examinations every 2 years.

According to the expired union contract under which PSPD officers continue to work, "All Protective Services Division members will report for a physical examination every two (2) years on the anniversary of their appointment date, until such time as they terminate their employment with the Protective Services [Division]."⁵⁴ The union contract also states that a subcommittee with union and management representatives shall be formed to establish procedures implementing physical examinations.

Through interviews, the team learned that officers do not receive physical examinations every 2 years. An interviewee stated that rapid turnover in management hindered final decisions on union agreements and the requirements of the union contract were not enforced. One manager stated that he/she did not know why officers were not receiving physical examinations.

Without periodic physical examinations, PSPD cannot determine whether officers are physically able to perform their duties. Some interviewees stated that some officers are not in

⁵⁴ Agreement between International Brotherhood of Police Officers Local 445 and the Government of the District of Columbia Department of Administrative Services, Article 17, § F.

FINDINGS AND RECOMMENDATIONS

suitable physical condition to carry out job functions. Officers who are unable to adequately perform their job functions may pose an increased risk of injury to themselves, coworkers, and the public. In addition, physical examinations could assist PSPD by identifying conditions that may increase employees' risk of injury,⁵⁵ reducing costs associated with turnover,⁵⁶ reducing health-related absences, and promoting workplace safety.

Recommendations:

- (1) That the D/DRES ensure that officers receive physical examinations every 2 years.

Agree _____ Disagree X

DRES's April 2010 Response to Recommendation, As Received:

At this time, DRES does not require officers to undergo physical examinations every two (2) years. DRES is currently preparing a solicitation for a job task analysis to be performed for PSPD positions. The purpose of the job task analysis is to determine the specific physical and mental requirements for the position. The physical requirements currently found in the Position Descriptions are vague and superficial at best and do not provide documentation for the true physical and mental requirements for the position, enabling a physician to provide a sound determination. By completing the job task analysis PSPD will be able to thoroughly define the requirements.

- (2) That the D/DRES work with union representatives to ensure that a union/management subcommittee develops written procedures for conducting physical examinations.

Agree X Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

PSPD meets monthly with the FOP to discuss matters of interest to both labor and management. Following completion of the job task analysis, PSPD and FOP will be able to discuss the physical and mental requirements, as well as the frequency of exams, examination procedures and requirements.

9. Frontline employees find policies and procedures for daily operations insufficient and out-of-date.

The GAO *Internal Control Management and Evaluation Tool* (GAO-01-1008G, August 2001) contains standards that assist agencies in maintaining and implementing internal controls,

⁵⁵ See <http://www.kroll.com/services/screening/physicals/> (last visited June 1, 2009).

⁵⁶ See <http://www.medicalaccessonline.com/physicalexam.htm> (last visited June 1, 2009).

FINDINGS AND RECOMMENDATIONS

such as policies and procedures.

GAO suggests the following:

Internal control activities are the policies, procedures, techniques, and mechanisms that help ensure the management's directives to mitigate risks ... are carried out. Control activities are an integral part of the agency's planning, implementing, and reviewing. They are essential for proper stewardship and accountability for government resources and for achieving effective and efficient program results.

...

1. **Appropriate policies, procedures, techniques, and mechanisms exist with respect to each of the agency's activities.**

...

2. **The control activities identified as necessary are in place and being applied. Consider the following:**

- Control activities described in policy and procedures manuals are actually applied and applied properly.

...

3. **Control activities are regularly evaluated to ensure that they are still appropriate and working as intended.⁵⁷**

The team learned through interviews that frontline employees see deficiencies in the policies and procedures for daily operations, which are key internal controls. Multiple officers stated that PSPD uses policies and procedures that are not approved by management, in writing, or current. An employee stated, "There were no general orders or policies and procedures when [he/she] came on and there still are none. Everything has been told by word-of-mouth." Another employee stated, "I would like to see policies for the guidance of day-to-day operations for unity throughout the agency." In addition, employees stated that policies and procedures do not exist for every function of PSPD. For instance, PSPD's physical security involves electronic video monitoring to detect intrusions and notify officers of crimes in progress in buildings secured by PSPD, but policies and procedures do not exist for these incidents. Employees said that they follow past practices and industry standards for day-to-day operations.

According to employees, there are policies and procedures in the form of General Orders that are not signed by the Chief of PSPD, making them invalid and inoperative according to

⁵⁷ *Id.* at 34.

FINDINGS AND RECOMMENDATIONS

General Order 2004.005.⁵⁸ Therefore, some employees do not know what policies are current and in effect. A PSPD manager stated in February 2009, that PSPD is in the process of updating policies and procedures and a manual will be disseminated when this process is complete. A senior official informed the team that administrative policies have been distributed to employees and that there are training manuals for firearm use and making arrests. This official also stated that it would be ideal to have all policies and procedures in one manual.

When written policies and procedures do not exist, are incomplete, outdated, or unorganized, inconsistent practices among employees and errors due to lack of knowledge may occur and employees may not be able to carry out their job duties. Furthermore, it could lead to inaccurate and unreliable records due to inconsistent practices among employees. Finally, PSPD cannot facilitate training or ensure a high degree of consistency and accountability among employees.

Recommendations:

- (1) That the D/DRES ensure that complete and current written policies and procedures exist for all PSPD operations.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

PSPD continues to draft and update comprehensive policies and procedures for PSPD functions. As discussed earlier, Post Orders have been created for each post staffed by PSPD and our contract security vendors. These post orders are reviewed at least annually. Policies and procedures are drafted and updated on a regular basis.

- (2) That the D/DRES ensure that PSPD develops a policies and procedures manual and disseminates this manual to all PSPD employees.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

PSPD has developed policies, procedures, and training documents that are included in trainings, including the new employee orientation (Attachment B) and the in-service training (Attachment C). When these are finalized, they are compiled into a manual and maintained both electronically and in hard copy. All officers receive training on policies and procedures during new hire orientations, In-Service Training, Roll Call, and on an individual basis when training in a new position. Policies and procedures are reviewed on a recurring basis.

OIG Response: **DRES Attachments B and C are at Appendix 3 of this report.**

⁵⁸ Only final General Orders that are signed by the Chief of PSPD are considered valid and operative.

FINDINGS AND RECOMMENDATIONS

- (3) That the D/DRES create a schedule for reviewing policies and procedures to ensure they function as intended and are up-to-date.

Agree _____ **X** _____ Disagree _____

DRES's April 2010 Response to Recommendation, As Received:

All General Orders (policies and procedures) will be reviewed on a routine basis every three (3) years. General Orders will be reviewed in an ongoing manner in preparation for training and based on feedback from officers as well. This review period will allow for sufficient feedback and quality control.

FINDINGS AND RECOMMENDATIONS

APPENDICES

APPENDICES

APPENDICES

- Appendix 1:** List of Findings and Recommendations
- Appendix 2:** Compliance Form for Accessibility at 441 4th St., N.W. with DRES/PSPD Response
- Appendix 3:** Documents Provided by DRES in Response to the Draft Report

APPENDIX 1

APPENDICES

Summary of Compliance Form for a Priority Matter:

1. **Employees and the public can enter One Judiciary Square through an eatery without being screened by security personnel at security checkpoints.**

Summaries of Management Alert Reports:

1. **Some PSPD officers do not have the necessary protective equipment.**
2. **Some security posts lack or do not have sufficient post orders.**

Key Findings:

1. **Security contractor allows contraband to pass through security checkpoints at District-owned and -leased buildings and is assessed monetary penalties for these contract violations.**
 - a. *Hawk One, Inc. security company fails to provide appropriate security services resulting in monetary penalties.*
 - b. *Hawk One officers failed to detect and seize contraband during security checks at District-owned and -leased buildings.*
 - (1) That the Director of the Department of Real Estate Services (D/DRES) seek to increase monetary penalties for noncompliance by contractors.
 - (2) That the D/DRES consider hiring more PSPD officers to replace contract officers.
2. **Some officers do not have the required training to carry out their job duties.**
 - (1) That the D/DRES ensure that all officers receive the required annual law enforcement and annual training needed to fulfill their job responsibilities and document all training in personnel files.
 - (2) That the D/DRES develop a control mechanism that tracks officers' training hours and notifies managers and officers when training is required.
3. **Some officers are not requalifying with their firearms as required by PSPD policy.**
 - (1) That the D/DRES ensure that officers requalify twice annually with their firearms, and document all training in personnel files.

APPENDICES

- (2) That the D/DRES develop a tracking system that alerts managers and officers when they are required to requalify with their weapons.

4. Background investigations for officers are not thoroughly documented or vetted.

a. Some officers' files do not have complete background investigation checklists and background investigation questionnaires, and/or some files are missing background check supporting documentation.

b. There are no written policies and procedures for obtaining and reviewing background checks from SOMB.

- (1) That the D/DRES collaborate with SOMB to develop and implement written policies and procedures for conducting background checks prior to employment.
- (2) That the D/DRES develop a plan for disseminating the results of the background checks to appropriate PSPD personnel for review.
- (3) That the D/DRES ensure that background check results are in all officers' personnel files.

5. There is a shortage of PSPD officers for daily operations.

- (1) That the D/DRES conduct a staffing analysis of all PSPD posts and shifts to determine the level of staffing required to fulfill PSPD's mission.
- (2) That the D/DRES hire personnel to adequately staff all posts at District-owned and -leased buildings managed by DRES.

Additional Findings:

6. PSPD does not have a current union contract for its officers.

- (1) That the D/DRES work with union representatives to expeditiously finalize a new contract.
- (2) That the D/DRES consider partnering with MPD's collective bargaining efforts or using MPD's agreement as guidance in renewing efforts to bring about a new contract.

APPENDICES

7. **Not all officers are disciplined when they violate the District of Columbia Personnel Manual (DPM).**

- (1) That the D/DRES develop and implement a policy to ensure that PSPD senior management is alerted in writing to all issues that may require disciplinary action.
- (2) That the D/DRES provide periodic training for supervisors on properly documenting various types of disciplinary action for employee misconduct.
- (3) That the D/DRES ensure that disciplinary actions are appropriately documented and consistently enforced.

8. **Officers do not undergo physical examinations every 2 years.**

- (1) That the D/DRES ensure that officers receive physical examinations every 2 years.
- (2) That the D/DRES work with union representatives to ensure that a union/management subcommittee develops written procedures for conducting physical examinations.

9. **Frontline employees find policies and procedures for daily operations insufficient and out-of-date.**

- (1) That the D/DRES ensure that complete and current written policies and procedures exist for all PSPD operations.
- (2) That the D/DRES ensure that PSPD develops a policies and procedures manual and disseminates this manual to all PSPD employees.
- (3) That the D/DRES create a schedule for reviewing policies and procedures to ensure they function as intended and are up-to-date.

APPENDIX 2

APPENDICES

District of Columbia
Office of the Inspector General

Findings and Recommendations for a Priority Issue
COMPLIANCE FORM

Use this form to report actions on recommendations made by the Office of the Inspector General (OIG) during and following an inspection of your agency, program, or other matters. Include all information necessary to show compliance with the recommendation. *Fax and then mail* the completed form and any attachments to Office of the Inspector General, Attention: [REDACTED], Director of Planning and Inspections, Inspections and Evaluations Division. The address is 717 14th Street, Northwest, Suite 500, Washington, D.C. 20005. Telephone: 202/727.2540. The fax number is 202/727.6992.

INSPECTION OF: Office of Property Management's Protective Services Division

PERIOD OF INSPECTION: Ongoing

The OIG Inspection Team (Team) currently inspecting the Office of Property Management's (OPM) Protective Services Division (PSD) believes the following issues should be called to the attention of the Director of OPM, Robin-Eve Jasper, and the Chief of the Protective Services Division, [REDACTED] prior to completion of OIG evaluation activities and publication of the final report of the special evaluation.

FINDINGS:

Employees and the public may enter One Judiciary Square through an eatery without being screened by security personnel at security checkpoints.

One Judiciary Square is located at 441 4th St. N.W. and is occupied by multiple District government agencies, including the Office of the Chief Technology Officer (OCTO), the Office of the Attorney General (OAG), the Office of Administrative Hearings (OAH), the Department of Human Resources (DCHR), the Office of the State Superintendent of Education (OSSE), the Office of Contracting and Procurement (OCP), and the Office of the Chief Financial Officer (OCFO). According to the post orders for One Judiciary Square, officers are required to conduct 100% identification checks of each District employee, contractor, and visitor by physically touching and reviewing their identification badge. Additionally, all individuals are required to be screened by a metal detector.

APPENDICES

Office of Property Management's Protective Services Division
March 24, 2009
Page 2 of 2

Observation of One Judiciary Square revealed that individuals can enter the building through an eatery that is open to the public and can bypass security checkpoints. There is a door that connects the eatery to the main building that allows entry into the building's rear access hallway without passing through a security checkpoint. That hallway leads to a freight elevator that allows individuals to access all the floors within the building. Someone could enter the building at the same time an employee enters or exits the eatery, or someone could hold the door open to allow individuals access to the building.

RECOMMENDATION

We recommend that the OPM/PSD Director take prompt action to ensure that employees and the public cannot bypass security checkpoints and enter One Judiciary Square through the eatery.

RESPONSE DUE TO THE OIG: March 31, 2009

Should you have any questions concerning the finding and recommendation, please contact [REDACTED] Director of Planning and Inspections, Inspections and Evaluations Division, at [REDACTED]

AGENCY ACTION TAKEN (attach additional information as necessary):

- Physical Security Specialist Jeffrey Ryder surveyed the site on March 25, 2009 and made the following observations and recommendations:
 - Rear hallway is accessible from the staff side of the eateries only, users cannot enter from the public seating area.
 - The doorway from the eateries leads to a corridor that is part of an egress path and is accessible from the main lobby without a key or credential.
 - The appropriate solution is to restrict access from the corridor to the freight elevators, forcing visitors back out to the lobby (and screening) in order to access floors 1C, 2-11.
 - Existing access control hardware and wiring is present. New locks and closers need to be installed to restrict freight elevator access from the north and south rear corridors.
 - ADT will provide a quotation for such within five business days.
 - Work will be complete within fifteen days of delivery of a purchase order to ADT.
 - PSPD will work with building management to enforce the proper use of these electronic security measures.

RESPONSIBLE OFFICIAL:

Name: [REDACTED] Title: Chief of Police
Phone: 202-698-3101 Fax: _____

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Office of Property Management's Protective Services Division
March 24, 2009
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Signature: 

Date: 3-27-09

APPENDIX 3

GOVERNMENT OF THE DISTRICT OF COLUMBIA
DEPARTMENT OF REAL ESTATE SERVICES



Office of the Director

April 20, 2010

Charles J. Willoughby
Inspector General
Office of the Inspector General
717 14th Street, NW, Suite 500
Washington, DC 20005

Dear Mr. Willoughby:

In reference to the Office of the Inspector General's (OIG) draft Report of Special Evaluation of the Department of Real Estate Services' Protective Services Division ("the Report"), DRES has compiled the following response.

We would like to state for the record that evaluations and reports such as this one are taken very seriously by DRES and we appreciate your agency's diligence and resolve in conducting this evaluation ("the Evaluation"). We would also like to note that this evaluation was initiated at a time when significant changes were occurring within the Protective Services Police Department (PSPD) including a change in leadership and a thorough internal analysis of PSPD operations. Based on the assessment and review of the new Chief of PSPD, many operational issues cited in the Report, as well as the OIG Management Information Reports and Management Action Reports released during this evaluation have already been resolved.

In response to the "Findings and Recommendations: Key Findings" cited in the Report, DRES provides comment inclusive of the draft Report in Attachment A. Additional attachments provide supporting documentation and are referenced with our comments as included in Attachment A.

I appreciate the opportunity to provide the OIG with comments on the Report. Again, I would like to thank the OIG for their diligence in conduct evaluations. If you require any additional information, please feel free to contact me on (202) 724-4400.

Sincerely,

Robin-Eve Jasper
Director

PROTECTIVE SERVICES POLICE DEPARTMENT
BASIC ORIENTATION

Attachment B

DAY 1

700 Orientation/Administrative
800 Meet the Chief and Training Staff
900 PSPD Structure, Chain of Command
1000 PSPD Authority and History
1100 Lunch
1130 PSPD Authority and History
1230 PSPD Patrol and Facilities
1430 PSPD Branch Operations

DAY 2

700 PSPD Policy and Procedures
900 PSPD Patrol Policy
1100 Lunch
1130 General/Special Orders and Memorandums

DAY 3

700 Basic Report Writing
1100 Lunch
1130 Basic Report Writing

DAY 4

700 Report Writing
1100 Lunch
1130 Review and Knowledge of PSA
1230 Property Forms
1330 Proper Use of Radio

Day 5

700 General Appearance: Uniform, Hair, Equipment, ect.
900 DC Superior Court, Grand Jury, Juvenile Processing
1100 Lunch
1130 Roll Call
1230 Meet with FTO Training Officer
1400 Meet with FTO Training Sergeant

**PSPD 2010 In-Service
Phase I**

Attachment C

Day 1

- 700 Basic Report Writing/Arrest Procedures (MPD Forms)
- 1000 Fourth Amendment/Constitutional Updates
- 1200 Lunch
- 1230 Cop Killer/DOJ Statistics on Police Assaults
- 1400 Parking Notice of Infractions

Day 2

- 700 Active Shooter Review and Procedures
- 900 Weapons Maintenance and Safety
- 1200 Lunch
- 1230 Use of Force
- 1430 OC Spray Review

Day 3

- 700 Radio Procedures/Transition to MPD Radio
- 900 ASP Baton Recertification
- 1100 Lunch
- 1130 ASP Baton Recertification
- 1330 Control Tactics/Handcuffing

Day 4

- 700 CPR and First Aid
- 1100 Lunch
- 1130 CPR and First Aid

Day 5

- 700 Semi-Annual Firearms Training
- 1200 Lunch
- 1230 Maintenance, Handling & Safeguarding of Service Weapon

**Department of Real Estate Services
Equipment and Training Log
April 9, 2010**

Attachment D

Position	Last Name	First Name	Firearms Status	Firearms Qual	ASP issued	ASP Cert. date	OC issued	OC Cert. date	Comments
Sergeant			armed	3/10/2010	yes	12/22/2000	yes	12/22/2000	
Lead Officer			armed	3/4/2010	yes	1/19/2007	yes	1/19/2007	
Lead Officer			armed	7/23/2009	yes	12/2007	yes	12/2007	
Officer			armed	8/25/2009	yes	7/1/2009	yes	7/1/2009	
Officer			armed	3/30/2010	yes	2/15/2008	yes	2/15/2008	
Lieutenant			armed	9/3/2009	yes	3/1/1991	yes	3/1/1991	
Officer			armed	3/11/2010	yes	12/27/2007	yes	12/27/2007	
Lead Officer			armed	2/24/2010	yes	3/22/1991	yes	3/22/1991	
Officer			armed	9/3/2009	yes	12/27/2007	yes	12/27/2007	
Sergeant			armed	3/30/2010	yes	6/1/2007	yes	6/1/2007	
Chief			armed	3/10/2010	yes	6/1/2008	yes	3/1/1994	
Officer				4/2/2010	yes	4/1/1994	yes	4/1/1994	
Commander			armed	3/10/2010	yes	3/17/2009	yes	3/17/2009	
Lieutenant			armed	9/22/2009	yes	2/28/2008	yes	2/28/2008	
Sergeant			armed	2/18/2010	yes	6/1/2007	yes	6/1/2007	
Officer			unarmed	Lautenberg issue	yes	3/16/2009	yes	3/16/2009	Employee currently on extended leave
Lead Officer			armed	6/2/2009	yes	11/30/2006	yes	11/28/2006	
Officer			unarmed	8/27/2009	yes	6/1/2006	yes	6/1/2006	Employee currently on non-contact, light duty status.
Sergeant			armed	9/24/2009	yes	11/16/2000	yes	11/16/2000	
Lead Officer			armed	2/17/2010	yes	6/1/2007	yes	6/1/2007	
Lieutenant			armed	3/30/2010	yes	9/14/2005	yes	9/14/2005	
Captain			armed	3/4/2010	yes	2/7/1997	yes	2/7/1997	
Lead Officer			armed	3/30/2010	yes	11/17/2000	yes	11/17/2000	
Lead Officer			armed	2/17/2010	yes	11/30/2006	yes	11/30/2006	
Officer			unarmed	10/21/2009	yes	2/15/2008	yes	2/15/2008	Employee currently on extended leave
Commander			armed	3/10/2010	yes	3/1/1994	yes	3/1/1994	
Officer			armed	3/18/2010	yes	2/15/2008	yes	2/15/2008	
Lead Officer			armed	3/4/2010	yes	12/1/2007	yes	3/2/2007	
Sergeant			armed	3/4/2010	yes	2/1/2002	yes	2/1/2002	
Sergeant			armed	9/2/2009	yes	1/15/1999	yes	1/15/1999	
Officer			armed	9/24/2009	yes	1/19/2007	yes	1/19/2007	
Lead Officer			armed	3/11/2010	yes	7/1/1997	yes	7/1/1997	
Officer			armed	3/17/2010	yes	Feb-10	yes	7/1/1997	
Sergeant			armed	3/11/2010	yes	3/2/2007	yes	3/2/2007	
Recruit			unarmed						Recruits remain unarmed until they receive Police Academy training.
Lieutenant			armed	3/4/2010	yes	10/94	yes	Jun-05	
Lead Officer			armed	9/10/2009	yes	5/1/1996	yes	5/1/1996	
Lead Officer			armed	11/9/2009	yes	11/30/2006	no		Employee not issued OC due to medical limitations. DRES-HR is working with employee to mitigate.
Officer			armed	1/29/2010	yes	11/5/1999	yes	11/5/1999	
Lieutenant			armed	3/3/2010	yes	11/30/2006	yes	11/30/2006	
Lieutenant			armed	3/17/2010	yes	4/1/2001	yes	4/1/2001	
Lieutenant			armed	3/17/2010	yes	1/1/1994	yes	1/1/1994	
Officer			armed	2/17/2010	yes	04/2006	yes	4/1/2006	
Lead Officer			armed	2/24/2010	yes	7/7/2004	yes	7/7/2004	
Sergeant			armed	3/4/2010	yes	11/16/2000	yes	6/1/2007	
Deputy Chief			armed	8/26/2009	yes	1/15/1998	yes	1/15/1998	
Commander			armed	3/10/2010	yes	5/1/1995	yes	5/1/1995	
Lead Officer			armed	2/17/2010	yes	10/1/1994	no	n/a	Has not yet taken training to become certified in OC; Employee on Worker's Comp
Officer			armed	3/4/2010	yes	12/27/2007	yes	12/27/2007	
Dep Chief			armed	3/10/2010	yes	4/1/1997	yes	4/1/1997	
Captain			armed	3/18/2010	yes	5/1/1994	yes	5/1/1994	
Captain			armed	3/17/2010	yes	3/1/1993	yes	3/1/1993	
Officer			armed	3/10/2010	yes	3/19/2009	yes	3/19/2009	
Officer			armed	9/29/2009	yes	3/17/2009	yes	3/17/2009	
Lieutenant			armed	3/30/2010	yes	8/1/2002	yes	8/1/2002	
Commander			armed	8/26/2009	yes	04/1/1993	yes	4/1/1993	
Officer			unarmed		yes	11/30/2006	yes	11/30/2006	Employee in non-contact status pending qualification with weapon
Officer			armed	9/3/2009	yes	6/2009	yes	6/2009	
Officer			armed	3/18/2010	yes	7/2/2009	yes	7/2/2009	
Commander			armed	3/10/2010	yes	5/1/1996	yes	5/1/1996	
Lead Officer			armed	9/2/2009	yes	11/28/2006	yes	11/28/2006	
Recruit			unarmed						Recruits remain unarmed until they receive Police Academy training.

**Department of Real Estate Services
Equipment and Training Log
April 9, 2010**

Attachment D

Position	Last Name	First Name	Firearms Status	Firearms Qual	ASP issued	ASP Cert. date	OC issued	OC Cert. date	Comments
Sergeant			armed	12/31/2009	yes	10/22/2004	yes	10/22/2004	
Lieutenant			armed	3/18/2010	yes	1/19/2007	yes	1/19/2007	
Recruit			unarmed						Recruits remain unarmed until they receive Police Academy training.
Captain			armed	10/20/2009	yes	3/19/2009	yes	3/19/2009	
Lead Officer			armed	3/18/2010	yes	3/2/2007	yes	3/2/2007	
Officer			unarmed	W/C	no	n/a	no	n/a	Employee currently on extended leave
Sergeant			armed	3/4/2010	yes	7/28/1997	yes	7/28/1997	
Lead Officer			armed	3/30/2010	yes	3/19/2009	yes	3/19/2009	
Officer			armed	3/4/2010	yes	5/25/2001	yes	5/25/2001	
Officer			armed	3/30/2010	yes	6/1/2008	yes	6/1/2008	
Lead Officer			armed	3/30/2010	yes	3/1/2010	yes	4/9/2010	
Assistant Chief			armed	11/25/2009	yes	6/1/1994	yes	6/1/1994	
Officer			armed	3/31/2010	yes	1/1/1994	yes	1/1/1994	
Officer			armed	3/4/2010	yes	12/27/2007	yes	12/27/2007	
Officer			armed	3/18/2010	yes	10/20/1999	yes	12/27/2007	
Officer			armed	3/11/2010	yes	12/27/2007	yes	2/15/2008	
Officer			armed	9/1/2009	yes	11/16/2000	yes	11/16/2000	
Officer			armed	3/11/2010	yes	5/30/1997	yes	5/30/1997	
Officer			armed	3/4/2010	yes	6/4/2004	yes	6/4/2004	

**PROTECTIVE SERVICES POLICE DEPARTMENT
FIREARMS TRAINING SCHEDULE AND COURSE SYLLABUS**

Attachment E

DAY	CLASS	HOURS
MONDAY	Safety Class (AM) - Nomenclature (PM)	8
TUESDAY	Marksmanship (AM) - Dry Drills (PM)	8
WEDNESDAY	Dry Drills (AM) - Dry Drills, Care and Cleaning (PM)	8
THURSDAY	Dry Drills (AM) - Live Fire (PM)	8
FRIDAY	Dry/Live Fire (AM) - Deadly Force	8
	WEEK TWO	
MONDAY	Dry/Live Fire (AM) - Deadly Force (PM)	8
TUESDAY	Begin Course Familiarization and Quals	8
WEDNESDAY	Continue Quals (AM) - General Orders (PM)	8
THURSDAY	Qualifications and Remedial	8
FRIDAY	Qualifications and Remedial	8

Additional training if needed
Course may change with available range times

Department of Real Estate Services
PSPD Posts and Post Order Review
April 5, 2010

Site #	Post #	Address	Post Location	Post Hrs	Post Orders Present	Date of Final Draft	Date of Review	Date of Dissemination and Training	Added	Deleted
1	P1	1205 Brentwood Road N.E.	DMV-Road Test Front Lobby	M-F 8:00-20:00	Yes	15-Dec-08	Jan-10	17-Feb-09		
2	P1	1233 Brentwood Road N.E.	DMV-Licence-Tags Lobby/Rover	M-F 8:00-20:00	Yes	15-Dec-08	N/A	17-Feb-09		X
2	P2	1233 Brentwood Road N.E.	DMV-Parking Lot	M-F 8:00-18:00	Yes	15-Dec-08	N/A	17-Feb-09		X
3	P1	1241 & 1261 W. Street N.E.	DPW-Fleet Front Gate	M-F 15-23:00	Yes	20-Feb-09	Feb-10	23-Feb-09		
4	P1	1300 1st Street N.E.	DOH-Rehab.-Substance Front Door	M-F 7:00-18:30	Yes	20-Feb-09	Feb-10	23-Feb-09		
4	P2	1300 1st St. NE--2nd Floor	DOH-Rehab.-Substance Waiting Area	M-F 8:00-16:30	Yes	20-Feb-09	Feb-10	23-Feb-09		
5	P1	1338 G. Street S.E.	DDOT-Traffic Signs Guard Post/Front	M-F 8:00-18:00	Yes	15-Jan-09	Jan-10	17-Feb-09		
6	P1	1350 Penn. Ave. N.W. 14th & 13.5	14th Street Entrance	M-F 7:00-15:00	Yes	15-Dec-08	Jan-10	17-Dec-08		
6	P2	1350 Penn. Ave. N.w. 14th & 13.5	Mail room, Delivery room	M-F 8:30-16:30	Yes	15-Dec-08	Jan-10	17-Dec-08		
6	P3	1350 Penn. Ave. N.w. 14th & 13.5	14th Street Entrance	M-F 8:30-16:30	Yes	15-Dec-08	Jan-10	17-Dec-08		
6	P4	1350 Penn. Ave. N.w. Mailroom	14th Street Entrance/13th Street Ent.	M-F 10:00-18:00	Yes	15-Dec-08	Jan-10	17-Dec-08		
6	P5	1350 Penn. Ave. N.w.	D Street Entrance	24/7	Yes	15-Dec-08	Jan-10	17-Dec-08		
7	P1	1403 W. Street N.e.	DPW-Fleet Front Gate	24/7	Yes	15-Jan-09	Jan-10	17-Feb-09		
8	P1	1725 15 th. Street N.e.	DDOT Parking Enforcement/ Front Gate	M-F 7:30-21:00	Yes	15-Jan-09	Jan-10	17-Feb-09		
9	P1	1833 West Virginia Ave. N.e.	DMV-Inspection Station Front Gate	24/7	Yes	15-Jan-09	Jan-10	17-Feb-09		
10	P1	1900 Mass. Ave. S.e. Bldg 12	DOH-Detox Front Entrance	Su-Sat 7:00-15:00	Yes	15-Jan-09	Jan-10	18-Feb-09		
10	P1	1900 Mass. Ave. S.e. Bldg 12	DOH-Detox Front Front Entrance	Su-Sat 15:00-23:00	Yes	15-Jan-09	Jan-10	18-Feb-09		
10	P2	1900 Mass. Ave. S.e. Bldg 12	DOH-Detox Back Post Consumer Area	Su-Sat 15:00-7:00	Yes	15-Jan-09	Jan-10	18-Feb-09		
11	P1	1900 Mass. Ave. S.e. Bldg 13	DOH-Wom.Serv. Front Door	M-F 7:00-16:00	Yes	15-Jan-09	Jan-10	18-Feb-09		
11	P1	1900 Mass. Ave. S.e. Bldg 13	DOH-Wom.Serv. Front Door	Sat. 7:00-11:00	Yes	15-Jan-09	Jan-10	18-Feb-09		
12	P1	1900 Mass. Ave. S.e. Bldg 14	DOH-C.P.E.P. Front Admittance Area	24/7	Yes	15-Jan-09	Jan-10	18-Feb-09		
12	P2	1900 Mass. Ave. S.e. Bldg 14	DOH-C.P.E.P. Back Patient Area	24/7	Yes	15-Jan-09	Jan-10	18-Feb-09		
13	P1	1900 Mass. Ave. S.e. Bldg 15	DOH-Chest & X Front Door	24/7	Yes	15-Jan-09	Jan-10	18-Feb-09		
14	P1	2146 24th. Place N.E	DOH-Rehab.-Substance Front Lobby	24/7	Yes	15-Dec-08	Feb-10	18-Feb-09		
15	P1	2175 West Virginia Ave. N.e.	MPD-Fleet Front Gate	M-F 6-22:00	Yes	15-Jan-09	Mar-10	18-Feb-09		
15	P1	2175 West Virginia Ave. N.e.	MPD-Fleet Front Gate	Sat, Sun 6:00-22:00	Yes	15-Jan-09	Mar-10	18-Feb-09		
15	P1	2175 West Virginia Ave. N.e.	MPD-Fleet Front Gate	Su-Sat 22:00-6:00	Yes	15-Jan-09	Mar-10	18-Feb-09		
16	P1	2200 Adams Place N.e.	OPM-DCPS-Warehouse Front Gate	24/7	Yes	20-Feb-09	Feb-10	23-Feb-09		
17	P1	222 Massachusetts Ave. N.w.	O.C.T.O.-S.H.A.R.E. Main Door Entrance 24/7	24/7	Yes	20-Feb-09	Feb-10	23-Feb-09		
18	P1	300 Indiana Ave. N.w.	MPD-Main Entrance	24/7	Yes	15-Dec-08	Feb-10	19-Feb-09		
18	P2	300 IN Ave. N.w. Park Gar.	MPD-HQ-Parking Garage	24/7	Yes	15-Dec-08	Feb-10	19-Feb-09		
18	P3	300 IN Ave. N.W. X Ray Main Ent.	Indiana main Entrance	M-F 8:00-16:00	Yes	15-Dec-08	Mar-10	19-Feb-09		
18	P4	300 IN Ave. N.W. X Ray Main Ent.	Indiana main Entrance	M-F 7:00-15:00	Yes	15-Dec-08	Mar-10	19-Feb-09		

Department of Real Estate Services
PSPD Posts and Post Order Review
April 5, 2010

Site #	Post #	Address	Post Location	Post Hrs	Post Orders Present	Date of Final Draft	Date of Review	Date of Dissemination and Training	Added	Deleted
18	P5	300 IN Ave. N.w. J Marshall	J. Marshall West Side Entrance	M-F 7:00-16:00	Yes	15-Dec-08	Mar-10	19-Feb-09		
18	P6	300 IN Ave. N.w. 3rd St.	MPD-HQ-Side Ent. 3rd St.	M-F 8:00-16:30	Yes	15-Dec-08	Mar-10	19-Feb-09		
19	P1	300 IN Ave. CSOSA	CSOSA 3rd Floor CSOSA Office	M-F 9:00-17:00	Yes	15-Dec-08	Mar-10	19-Feb-09		
20	P1	301 C St. Rm 1157	DMV Main DMV Floor	M-F 7:30-17:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
20	P2	301 C St.	DMV C Street X-Ray	M-F 7:00-17:00	Yes	15-Dec-08	Mar-10	19-Feb-09		
20	P2	301 C St.	DMV C Street X-Ray	M-F 7:00-16:30	Yes	15-Dec-08	Mar-10	19-Feb-09		
21	P1	33 N. Street N.e.	DHS-Inc-Maint Front Door	24/7	Yes	20-Feb-09	Jan-10	23-Feb-09		
21	P2	33 N. Street N.E.	DHS-Main Lobby Back Desk	M-F 7:00-21:00	Yes	20-Feb-09	Jan-10	23-Feb-09		
21	P3	33 N. Street N.E. 2nd Floor	DHS-Income-Maintenance 2nd Floor	M-F 10:00-18:30	Yes	20-Feb-09	Feb-10	23-Feb-09		
22	P1	35 K. Street N.e.	DOMH-Rehabilitation Front Lobby	M-F 7:00-23:00	Yes	15-Jan-09	Feb-10	27-Feb-09		
22	P1	35 K. Street N.e.	DOMH-Rehabilitation Front Lobby	Sat 8:00-16:00	Yes	15-Jan-09	Feb-10	27-Feb-09		
22	P1	35 K. Street N.e.	DOMH-Rehabilitation Front Lobby	Sun 10:00-16:00	Yes	15-Jan-09	Jan-10	27-Feb-09		
23	P1	400 6th. Street S.w.	CFSA Front Lobby X-Ray	M-F 8:00-16:00	Yes	15-Dec-08	Mar-10	19-Feb-09		
23	P1	400 6th. Street S.w. Lobby	CFSA Main Lobby X-Ray	M-F 5:00-18:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
23	P1	400 6th. Street S.w. Lobby	CFSA Main Lobby X-Ray	24/7	Yes	15-Dec-08	Feb-10	19-Feb-09		
23	P2	400 6th. Street S.w.	CFSA Parking Garage	M-F 6-10; 16:00-18:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
23	P3	400 6th. Street S.w. Rover	CFSA Main Lobby / Rover	24/7	Yes	15-Dec-08	Feb-10	19-Feb-09		
24	P1	441 4th Street. N.w. Lobby	PSD- Overnight Cov. Lobby	M-F 19-7:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
24	P1	441 4th Street. N.w. Lobby	PSD-Weekend Cov. Lobby	Sat 7:00-M 6:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
24	P1	441 4th Street. N.w. Lobby South	South X-Ray Machine	M-F 6:00-16:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
24	P2	441 4th Street. N.w. Lobby N.	North X-Ray	M-F 8:00-19:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
24	P3	441 4th Street. N.w. Dock	Loading Dock	M-F 7:00-18:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
25	P1	51 N. Street N.e. X-Ray	Visitor's Entrance	M-F 7:00-18:00	Yes	20-Feb-09	N/A	23-Feb-09		X
25	P1	51 N. Street N.e. X-Ray	Visitor's Entrance	W 18:00-21:00	Yes	20-Feb-09	N/A	23-Feb-09		X
25	P2	51 N. Street N.e. Front Desk	Roving Patrol Employee / Entrance	24/7	Yes	20-Feb-09	N/A	23-Feb-09		X
26	P1	515 D. Street N.w.	Recorder of Deeds Lobby X-Ray	M-F 8:00-17:00	Yes	15-Jan-09	Jan-10	19-Feb-09		
26	P2	515 D. Street N.w.	Recorder of Deeds Lobby X-Ray	M-F 7:30-16:30	Yes	15-Jan-09	Jan-10	19-Feb-09		
27	P1	609 H. Street N.e.	DOES-Youth-Employ. Front Lobby	M-F 7:00-19:00	Yes	26-Feb-09	Feb-10	26-Feb-09		
28	P1	625 H. Street N.e.	DOES-Adults-Employ. Front Lobby	M-F 7:00-19:00	Yes	26-Feb-09	Feb-09	27-Feb-09		
29	P1	64 New York Ave. N.e.	Main Entrance Employee Entrance	M-F 7:00-18:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
29	P2	64 New York Ave. N.e.	Visitor Entrance Front Lobby	M-F 7:00-17:00	Yes	15-Dec-08	Feb-10	19-Feb-09		
30	P1	645 H. Street N.e.	Main Ent. X-Ray	M-F 6:30-18:00	Yes	26-Feb-09	Feb-10	27-Feb-09		
30	P1	645 H. Street N.e.	Main Ent. X-ray	M,T,TH,F 18:00-20:00	Yes	26-Feb-09	Feb-10	27-Feb-09		

Department of Real Estate Services
PSPD Posts and Post Order Review
April 5, 2010

Site #	Post #	Address	Post Location	Post Hrs	Post Orders Present	Date of Final Draft	Date of Review	Date of Dissemination and Training	Added	Deleted
30	P1	645 H. Street N.e.	Lobby	Alternate Sat 7:30-16:00	Yes	26-Feb-09	Feb-10	27-Feb-09		
30	P2	645 H. Street N.e.	Sign-In Desk/Patrol Main Lobby	M-F 7:00-15:00	Yes	26-Feb-09	Feb-10	27-Feb-09		
30	P2	645 H. Street N.e.	Sign-In Desk/Patrol	W 15:00-22:00	Yes	26-Feb-09	Feb-10	27-Feb-09		
31	P1	825 North Capitol Street N.e.	DCPS-Front Lobby X-Ray	M-F 8:00-19:00	Yes	15-Dec-09	Oct-09	19-Feb-09		
31	P2	825 North Capitol Street N.e.	DCPS-Front Lobby X-Ray	M-F 7:00-19:00	Yes	15-Dec-08	Oct-09	19-Feb-09		
32	P1	900 New Jersey Ave. S.e.	Public Works-Fleet Lobby/ Rover	M-S 15:00-7:00	Yes	15-Dec-08	Oct-09	19-Feb-09		
33	P1	941 N. Cap. N.e.	First Level Parking X-Ray	M-F 6:00-18:00	Yes	20-Feb-09	Oct-09	20-Feb-09		
33	P2	941 N. Cap. N.e.	2nd Level Parking X-Ray	M-F 6:00-18:00	Yes	15-Jan-09	Oct-09	20-Feb-09		
33	P3	941 N. Cap. N.e.	Tax & Revenue North Entrance	M-F 6:00-18:00	Yes	15-Jan-09	Jan-09	20-Feb-09		
33	P4	941 N. Cap. N.e.	X-Ray Machine Front Lobby	M-F 7:00-20:00	Yes	15-Jan-09	Jan-09	20-Feb-09		
34	P1	95 M. Street S.w.	DMV Inside/Rover	M-S 8:00-16:30	Yes	15-Dec-08	Feb-10	20-Feb-09		
34	P2	95 M. Street S.w.	DMV Parking Lot	24/7	Yes	15-Dec-08	Feb-10	20-Feb-09		
35	P1	1125 Spring Road N.w. Main Ent.	DOMH-Rehabilitation Front Lobby Ent.	24/7	Yes	15-Dec-08	N/A	27-Feb-09		X
35	P2	1125 Spring Road N.w. Pharmacy	DOMH-Rehab 2nd Floor Pharmacy	M-F 9:00-17:00	Yes	15-Dec-08	N/A	27-Feb-09		X
36	P1	1207 Taylor Street N.w. Main Lobby	DHS-Inc.-Maintenance Front Lobby	M,T, TH,F 7:00-17:00	Yes	15-Dec-08	Oct-09	20-Feb-09		
36	P1	1207 Taylor Street N.w. Main Lobby	DHS-Inc.-Maintenance Front Lobby	M,T, TH,F 17:00-18:00	Yes	15-Dec-08	Oct-09	20-Feb-09		
36	P1	1207 Taylor Street N.w. Main Lobby	DHS-Inc.-Maintenance Front Lobby	M-F 17:00-20:00	Yes	15-Dec-08	Oct-09	20-Feb-09		
36	P1	1207 Taylor Street N.w. Main Lobby	DHS-Inc.-Maintenance Front Lobby	W 17:00-21:00	Yes	15-Dec-08	Oct-09	20-Feb-09		
36	P1	1207 Taylor Street N.w. Main Lobby	DHS-Inc.-Maintenance Front Lobby	Alt. Sat 7:30-16:00	Yes	15-Dec-08	Oct-09	20-Feb-09		
37	P1	1250 U. Street N.W.	DOMH-Rehabilitation Front Lobby	M-F 7:00-19:00	Yes	15-Dec-08	Feb-10	20-Feb-09		
38	P1	2000 14th. Street N.w.	Reeves Center Front Lobby	M-F 7:00-15:00	Yes	17-Mar-10	Dec-08	20-Feb-09		
38	P1	2000 14th. Street N.w.	Reeves Center Front Lobby	M-F 15:00-23:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P1	2000 14th. Street N.w.	Reeves Center Front Lobby	M-F 23:00-7:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P1	2000 14th. Street N.w.	Weekend Coverage Lobby	Sat. 7:00-Mon 7:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P2	2000 14th. Street N.w.	Reeves Center Parking Lot /Loading Dock	M-F 7:00-15:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P2	2000 14th. Street N.w.	Reeves Center Parking Lot /Loading Dock	M-F 15:00-23:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P2	2000 14th. Street N.w.	Reeves Center Parking Lot /Loading Dock	M-F 23:00-7:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P2	2000 14th. Street N.w.	Weekend Coverage PG/Load Dock	Sat. 7:00-Mon 7:00	Yes	17-Mar-10	Mar-10	20-Feb-09		
38	P3	2000 14th. Street N.w.	Lobby Store	M-F 7:30-17:30	Yes	17-Mar-10	Mar-10	20-Feb-09		
39	P1	310 McMillan Dr. N.w. Main Ent.	Fire-MPD-Comm Main Lobby	24/7	Yes	4-Mar-09	Feb-09	6-Mar-09		
39	P2	310 McMillan Dr N.w. Gate Ent.	Fire-MPD-Comm Front Gate	24/7	Yes	4-Mar-09	Feb-09	6-Mar-09		
40	P1	3222 M. Street N.w.	DMV-Licience-Tags Lobby/Rover	T-Sat 7:30-17:30	Yes	15-Dec-08	Dec-09	23-Feb-09		
40	P2	3222 M. Street N.w.	DMV-Licience-Tags Lobby/Rover	T-Sat 7:30-17:30	Yes	15-Dec-08	Dec-09	23-Feb-09		

Department of Real Estate Services
PSPD Posts and Post Order Review
April 5, 2010

Site #	Post #	Address	Post Location	Post Hrs	Post Orders Present	Date of Final Draft	Date of Review	Date of Dissemination and Training	Added	Deleted
41	P1	4900 Bates Road N.e.	Dpw-Solid Waste-Fuel Office Post	M.-F. 22:00-6:30	Yes	4-Mar-09	Feb-09	6-Mar-09		
41	P1	4900 Bates Road N.e.	Weekend Coverage Office Post	Sat 6:30-M 6:00	Yes	4-Mar-09	Feb-09	6-Mar-09		
42	P1	2100 Martin Luther King Ave. S.e.	Front Lobby	M-F 7:00-17:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
42	P1	2100 Martin Luther King Ave. S.e.	Front Lobby	M,T,Th,F 18:00-20:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
42	P1	2100 Martin Luther King Ave. S.e.	Front Lobby	W 17:00-21:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
42	P1	2100 Martin Luther King Ave. S.e.	Front Lobby	W 18:00-21:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
42	P1	2100 Martin Luther King Ave. S.e.	Front Lobby	Alt. Sat. 7:30-16:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
42	P2	2100 Martin Luther King Ave. S.e.	Back Waiting Area	M-F 7:30-18:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
43	P1	2390 South Capitol Street S.e.	DMV-CDL-Road Test-Lot Trailer Post	M-F 7:00-15:00	Yes	15-Jan-09	Jan-10	23-Feb-09		
44	P1	2700 Martin Luther King Ave. S.e.	DHS-HQ-Gate #4	M-F 7:30-9:30	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P1	2700 Martin Luther King Ave. S.e.	DHS-HQ-Gate #4	Su-Sa 8:00-16:00	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P1	2700 Martin Luther King Ave. S.e.	DHS-HQ-Gate #4	24/7	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P2	2700 Martin Luther King Ave. S.e. 13th St. & Alabama Ave	DHS-Headquarters_gate # 5	M-F 5:30-18:30	Yes	15-Dec-08	Oct-09	23-Feb-09		
44	P3	2700 Martin Luther King Ave. S.e. Congress Hghts Metro	DHS-Headquarters_gate # 6	Su-Sa 6:00-24:00	Yes	15-Dec-08	Oct-09	23-Feb-09		
44	P4	2700 Martin Luther King Ave. S.e.	Ground Patrol Over all grounds	24/7	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P5	2700 Martin Luther King Ave. S.e.	RMB Bldg-Lobby	24/7	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P6	2700 Martin Luther King Ave. S.e.	Fire Watch RMB Building	Su-Sa 8:00-24:00	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P6	2700 Martin Luther King Ave. S.e.	Fire watch RMB Building	Su-Sa 8:00-24:00	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P7	2700 Martin Luther King Ave. S.e.	John Howard Pavillion Lobby	Su-Sa 0800-1600	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P7	2700 Martin Luther King Ave. S.e.	John Howard Pavillion-Lobby	Su-Sa 1600-2400	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P7	2700 Martin Luther King Ave. S.e.	John Howard Pavillion-Lobby	Su-Sa 2400-0800	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P7	2700 Martin Luther King Ave. S.e.	John Howard Pavillion-Front Sally Port	Su-Sa 24:00-8:00 am	Yes	15-Dec-08	Oct-09	17-Dec-08		
44	P7	2700 Martin Luther King Ave. S.e.	John Howard Pavillion-Rear Sally Port	M-F 08:00-12:00	Yes	15-Dec-08	Oct-09	17-Dec-08		
45	P1	2720 MLK Jr. Ave. S.e. Main Gate	UCC Main Gate Entrance	24/7	Yes	15-Dec-08	Oct-09	17-Dec-08		
45	P2	2720 MLK Jr. Ave. SCC	SCC	24/7	Yes	15-Dec-08	Feb-10	17-Dec-08		
45	P3	2720 MLK Jr. Ave. Vist. Ent	Visitor Entrance	24/7	Yes	15-Dec-08	Feb-10	17-Dec-08		
45	P4	2720 MLK Jr. Ave. Vist. Ent	Visitor Entrance	M-F 7:00-15:00	Yes	15-Dec-08	Feb-10	17-Dec-08		
45	P4	2720 MLK Jr. Ave. Vist. Ent	Weekend Coverage Visitor Ent.	Sat 7:00-M 7:00	Yes	15-Dec-08	Feb-10	17-Dec-08		
45	P5	2720 MLK Jr. Ave. Emp. Ent.	Employee Entrance	24/7	Yes	15-Dec-08	Feb-10	17-Dec-08		
46	P1	3200 Benning Road N.e.	DPW-Solid Waste Guard post	M-F 15:00-7:00	Yes	4-Mar-09	Feb-10	6-Mar-09		
46	P1	3200 Benning Road N.e.	DPW-Solid Waste Guard post	Sat 7:00- M 7:00 & Holidays	Yes	4-Mar-09	Feb-10	6-Mar-09		

Department of Real Estate Services
PSPD Posts and Post Order Review
April 5, 2010

Site #	Post #	Address	Post Location	Post Hrs	Post Orders Present	Date of Final Draft	Date of Review	Date of Dissemination and Training	Added	Deleted
47	P1	3220 Pennsylvania Ave. S.e.	DMV-Licience-Tags Lobby Rover	M-F 7:45-17:15	Yes	15-Dec-08	Mar-10	23-Feb-09		
47	P2	3220 Pennsylvania Ave. S.e.	DMV-Licience-Tags Lobby Rover	M-F 8:00-17:00	Yes	15-Dec-08	Mar-10	23-Feb-09		
48	P1	3720 Martin Luther King Ave. S.e.	DOH-Rehab.-Substance Main Lobby	24/7	Yes	18-Mar-09	Mar-10	20-Mar-09		
49	P1	3851 Alabama Ave. S.e.	Front Lobby X-Ray	M,T, Th,F 7:00-20:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
49	P1	3851 Alabama Ave. S.e.	Front Lobby X-Ray	W 18:00-20:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
49	P1	3851 Alabama Ave. S.e.	Front Lobby X-Ray	W 20:00-21:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
49	P1	3851 Alabama Ave. S.e.	Front Lobby X-Ray	Alt. Sat. 7:30-16:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
49	P2	3851 Alabama Ave. S.e.	Front Lobby X-Ray	M-F 7:00-18:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
50	P1	3917 Minnesota Ave. N.e.	Front Entrance X-Ray	M-F 7:30-18:00	Yes	15-Dec-08	Mar-10	23-Feb-09		
50	P2	3917 Minnesota Ave. N.e.	Front Entrance X-Ray	M-F 7:00-19:00	Yes	15-Dec-08	Mar-10	23-Feb-09		
51	P1	3919 Benning Road N.e.	O.C.T.O.-S.H.A.R.E. Front Entrance	24/7	Yes	4-Mar-09	Feb-10	6-Mar-09		
52	P1	4001 South Capitol Street S.w.	Front Entrance X-Ray	M-F 7:00-18:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
52	P1	4001 South Capitol Street S.w.	Front Entrance X-Ray	M,T,Th,F 18:00-20:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
52	P1	4001 South Capitol Street S.w.	Front Entrance X-Ray	W 18:00-21:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
52	P1	4001 South Capitol Street S.w.	Front Entrance X-Ray	Alt. Sat 7:30-16:00	Yes	18-Mar-09	Jan-10	20-Mar-09		
53	P1	5001 Shepherd Parkway S.w.	MPD Impound Front Gate/ Rover	24/7	Yes	15-Dec-08	Feb-10	23-Feb-09		
54	P1	5001 Shepherd Parkway S.w.	DPW Front Entrance	24/7	Yes	15-Dec-08	Feb-10	23-Feb-09		
55	P1	821 Howard Road S.e.	DOMH-Rehabilitation Main Lobby	M-F 8:00-18:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
55	P1	821 Howard Road S.e.	DOMH-Rehabilitation Main Lobby	W 18:00-21:00	Yes	18-Mar-09	Feb-10	20-Mar-09		
56	P1	3855 8th. Street S.e.	Child & Family Services Front Ent.	M-F 7:30-19:30	Yes	20-Feb-09	Feb-10	27-Feb-09		
57	P1	429 O Street, NE	Safe Shores	M-F 0700-1900	YES	10-Jan-10	Mar-10	10-Mar-10	X	
58	P1	1100 4th Street, SW	DCRA	M-F 0600-1800	No	1-Apr-10	Apr-10	6-Apr-10	X	
59	P1	1101 4th Street, SW	Tax & Revenue	M-F 0600-1800	No	1-Apr-10	Apr-10	6-Apr-10	X	
60	P1	4049 South Captiol Street, SE	DOES	M-F 0700-1900	YES	27-Jan-10	Jan-10	27-Jan-10	X	
61	P1	1500 Franklin Street, NE	DOES	M-F 0800- 1630	YES	27-Jan-10	Jan-10	27-Jan-10	X	
62	P1	1125 15th Street, NW	DMH	M-F 0800- 1630	YES	27-Jan-10	Jan-10	27-Jan-10	X	
63	P1	2626 Naylor Road, SE	DOES	M-F 0800- 1630	YES	27-Jan-10	Jan-10	27-Jan-10	X	