April 21, 2004

LEE R. HEATH CHIEF POSTAL INSPECTOR

SUBJECT: Audit Report – Postal Inspection Service's Postal Police Officers (Report Number SA-AR-04-001)

This report presents results of our audit of the Postal Inspection Service's Postal Police Officers (Project Number 03BN009SA000). We initiated this audit in response to a request by members of Congress to review the Postal Service's decision to eliminate postal police officers at six Postal Service facilities.

The Postal Inspection Service used several methodologies to support its decision to eliminate postal police officers at the six facilities. These methodologies included studies and analyses; professional judgment based on interviews with local police, Postal Service managers, the Postal Inspection Service, and security force managers; and recommendations from the most recent Security Force Assessment Survey. However, the studies and surveys gave contrasting opinions on whether to maintain a postal police presence at the six facilities. Also, the Security Force Assessment Survey is over 18 years old and no documentation was available to assess the validity of its methodology.

Therefore, we recommended that the Postal Inspection Service update, document, and validate the methodology used for conducting Security Force Assessment Surveys or use an alternative process that can be validated and documented to evaluate the presence of postal police officers at Postal Service facilities. Management agreed with our recommendation and stated that if they continue to use this instrument to assess security, they will substantiate the methodology used in the Security Force Assessment Survey. They may also discontinue the use of the survey or use an alternative process. In either case, the survey instrument will not be the only method used to determine the continuance or establishment of an armed postal police presence at Postal Service facilities. Management's comments and our evaluation of these comments are included in the report.

The Office of Inspector General (OIG) considers the recommendation significant and, therefore, requires OIG concurrence before closure. Consequently, the OIG requests written confirmation when a corrective action is completed. This recommendation

1735 N Lynn St Arlington, VA 22209-2020 (703) 248-2100 Fax: (703) 248-2256 should not be closed in the follow-up tracking system until the OIG provides written confirmation that the recommendation can be closed. We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions, or need additional information, please contact Sandra D. Bruce, director, Oversight of Investigative Activities, at (703) 248-7885 or me at (703) 248-2300.

(John M. Seeba for)

Ronald D. Merryman
Deputy Assistant Inspector General
for Technology, Marketing, and Oversight

Attachment

cc: Mary Anne Gibbons John A. Rapp James J. Rowan, Jr. Susan M. Duchek Joseph K. Moore

INTRODUCTION

Background

The Postal Inspection Service maintains a security force of uniformed postal police officers who are assigned to Postal Service facilities throughout the country. The security force protects Postal Service employees and property by enforcing federal laws and regulations at Postal Service facilities. The Postal Service activated the first unit of security officers during December 1970 in Philadelphia, Pennsylvania. On January 18, 1971, the Postmaster General transferred the administrative and functional responsibility for the security force to the chief postal inspector.

Postal police officers provide perimeter security and may escort high-value mail shipments. In addition, postal police officers control access to Postal Service facilities by deterring unauthorized persons from entering. They also patrol parking lots and loading dock areas. Postal police officers carry firearms while performing their duties.

Since fiscal year (FY) 2002, the Postal Inspection Service has been conducting an assessment of its uniformed security force positions nationwide. As part of the Postal Inspection Service's security force transformation initiative, it is evaluating security coverage at facilities to determine the best deployment of resources and redesign the role of postal police officers. The Postal Inspection Service's initial objective was to limit armed security force coverage to facilities where there is a clear, definable need, and to use automated access control technology where feasible. The Postal Inspection Service management conducted an assessment survey at six security facilities.

On June 12, 2003, Postal Service management notified the Fraternal Order of Police, National Labor Counsel, Postal Service Number 2, that they intended to close six security force facilities on September 19, 2003. This notification was in accordance with Article 33 of the 1999 through 2003 Collective Bargaining Agreement between the Postal Service and the Fraternal Order of Police, National Labor Counsel, Postal Service Number 2.

On September 9, 2003, members of Congress requested that the Office of Inspector General (OIG) review the Postal Service's decision to eliminate the presence of postal police officers at six Postal Service facilities.

Objective, Scope, and Methodology

Our audit objective was to review the validity of the methodology Postal Inspection Service management used to support their decision to eliminate the presence of postal police officers at the six facilities. To accomplish our objective, we interviewed postal inspectors and postal police officers at the New York, Chicago, St. Louis, and Denver divisions. We also analyzed security reviews and security assessments performed by the Postal Inspection Service and interviewed Postal Inspection Service headquarters personnel from the Safety and Security group. In addition, we visited the Buffalo, New York; Hartford, Connecticut; Denver, Colorado; Seattle, Washington; Jacksonville, Florida; and Birmingham, Alabama, Processing and Distribution Centers. We interviewed postal police officers and Postal Service management and reviewed the current security at these facilities. We also analyzed the Security Force Assessment Surveys for each of the six facilities visited. In addition, we attempted to validate the methods used to support the Security Force Assessment Survey.

This audit was conducted from July 2003 through April 2004, in accordance with generally accepted government auditing standards and included such tests of internal controls, as were considered necessary under the circumstances. We reviewed policies and procedures regarding the Postal Inspection Service security force. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

Prior Audit Coverage

We did not identify any prior audits or reviews related to the objective of this audit.

¹ Buffalo Processing and Distribution Center; Hartford Processing and Distribution Center; Birmingham Processing and Distribution Center; Jacksonville Processing and Distribution Center; Denver Processing and Distribution Center; and Seattle Processing and Distribution Center.

AUDIT RESULTS

Security Assessment Methodologies Need Improvement

The Postal Inspection Service used several methodologies to support its decision to eliminate postal police officers at the six facilities in question. These methodologies included studies and analyses; professional judgment based on interviews with local police, Postal Service managers, the Postal Inspection Service, and security force managers; and recommendations from the most recent Security Force Assessment Survey. However, these studies and surveys gave contrasting opinions on whether to maintain a postal police presence at the six facilities.

Specifically, the Hallcrest Security Force Analysis conducted in 1997 recommended that Postal Inspection Service management maintain postal police officers at all six facilities. The Postal Inspection Service security review conducted in 2001 recommended a combination of maintaining postal police officers, upgrading physical security, and deploying existing postal police officers to other facilities.

Further, Postal Inspection Service management stated they held numerous discussions to determine the best use of their security force resources. This included interviews with local police, Postal Service and Postal Inspection Service representatives, and security force managers. Also, the assignment and complement size of postal police officer units are at management's discretion based on the needs of the Postal Service. On June 12, 2003, Postal Service management notified the Fraternal Order of Police, National Labor Counsel, Postal Service Number 2 that they intended to close security force facilities on September 19, 2003.

This notification was in accordance with Article 33 of the 1999 through 2003 Collective Bargaining Agreement between the Postal Service and the Fraternal Order of Police, National Labor Council, Postal Service Number 2, which allows for Postal Service management's discretion in this matter.

The closure of the six facilities contributed to reducing the Postal Inspection Service's complement size as follows:

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² Birmingham, Alabama; Hartford, Connecticut; and Jacksonville, Florida.

³ Buffalo, New York, and Denver, Colorado.

⁴ Seattle, Washington.

			Number of
		Number of	Postal
	<u>Location</u>	<u>Managers</u>	Police Officers
•	Seattle, Washington	3	19
•	Birmingham, Alabama	3	6
•	Hartford, Connecticut	4	13
•	Denver, Colorado	3	12
•	Buffalo, New York	4	14
•	Jacksonville, Florida	_2	<u>12</u>
	Total:	19	76

In addition, Postal Inspection Service management informed us that the Security Force Assessment Survey was another component used to determine the best deployment of security force resources consistent with current organizational challenges. This survey recommended eliminating postal police officers at all six facilities.

According to the guidelines in the <u>Inspection Service Manual</u>,⁵ the Security Force Assessment Survey⁶ is the basis for establishing or maintaining a security force at a Postal Service facility. Further, use of the Security Force Assessment Survey ensures the Postal Service obtains maximum benefits for security dollars and avoids unwarranted expenses.

The survey rates factors such as facility type, location, complement, service, security, and crime factors. Thus, according to the <u>Inspection Service Manual</u>, a score of 4,900 points on the survey is generally the determining factor for establishing or continuing a security force. To illustrate, the Security Force Assessment Surveys conducted from December 3, 2002, to January 21, 2003, for the six facilities resulted in the following:

•	Seattle, Washington	3,165 points
•	Birmingham, Alabama	3,642 points
•	Hartford, Connecticut	3,757 points
•	Denver, Colorado	3,961 points
•	Buffalo, New York	4,202 points
•	Jacksonville, Florida	4,910 points

⁵ Inspection Service Manual, Section 723.1.

⁶ See Appendix A for a sample survey.

⁷ Inspection Service Manual, Section 723.31.

However, Postal Inspection Service management could not provide documentation, such as an independent validation of the model, to explain why a score of 4,900 was the appropriate threshold for discontinuing postal police officers. Further, Inspection Service management had not updated the methodology for the Security Force Assessment Survey in more than 18 years.

In addition, Postal Inspection Service management computed the crime factor at a facility by using the Federal Bureau of Investigations Uniform Crime Reports to assign 1 point for every 100 crimes committed, with a maximum score of 1,000 points. However, management was not able to provide an explanation for the computation or the 1,000-point cap included in the survey.

Postal Inspection Service management told us the Security Force Assessment Survey was a tool they developed and included the items they felt were appropriate in reviewing Postal Service security needs. In addition, Postal Inspection Service management stated they had used the survey in the past and considered its continued use to be fair.

Postal Inspection Service management also stated the use of the Security Force Assessment Survey was upheld in a 1998 arbitration case in San Diego, California. We reviewed this case and concluded the arbitrator did not make a ruling regarding the use of the Security Force Assessment Survey.

Using a survey instrument that can be fully explained, supported, and validated helps ensure the Postal Service fully addresses its security needs in the current environment.

Recommendation

We recommend the chief postal inspector:

 Update, document, and validate the methodology used for conducting Security Force Assessment Surveys or use an alternative process that management can validate and document for use in evaluating the presence of postal police officers at Postal Service facilities.

Management's Comments

Postal Inspection Service management agreed with the recommendation and indicated that they will substantiate the methodology used in the Security Force Assessment Survey if they continue to rely on this instrument to assess Security Force

deployment. Management further indicated that they may discontinue the use of the survey or use an alternative process. In either case, the survey instrument will not be the only method relied upon to determine the continuance or establishment of an armed postal police presence at Postal Service facilities.

Conversely, management stated that our report failed to consider Inspection Service executives' input regarding the methodologies used in the decision making process.

Management also commented that our statement acknowledging that several methodologies were used in support of their decision to eliminate armed Security Force officers at six work sites was technically correct. However, it did not consider the time that lapsed since these studies were conducted or the crime prevention countermeasures that have been implemented during the following six years.

Management also stated that we failed to comment on the follow-up assessments conducted by the Inspection Service at the affected six worksites. Specifically, interviews with Postal Service management at these locations revealed a positive opinion of both access control technology and the unarmed contract personnel deployed at five of the six work sites impacted by the redeployment of the armed Security Force. Management's comments, in their entirety, are included in Appendix B of this report.

Evaluation of Management's Comments

Postal Inspection Service management's comments were responsive to the recommendation. Further, management's actions taken or planned are responsive to the recommendation and should correct the issue identified in the finding.

However, we express concern that management indicated that we did not obtain or consider pertinent information while reporting the results of this audit. Specifically, they stated that appropriate Inspection Service executives were not included as part of the audit. We interviewed key members of management, including executives, regarding the use and validity of the Security Force Survey. Management indicated that they did not know when the survey was originally used or how it was validated. We also interviewed key executives on how the decision to eliminate postal police officers was made. Management informed us that the decision was at management's discretion and was made at a leadership team meeting where no notes were taken.

In addition, we reviewed the follow-up assessments conducted by the Inspection Service at the six worksites and determined the assessments provided the same conclusion as the initial survey results. However, these findings do not eliminate the need for management to have a validated and documented process for evaluating the presence of postal police officers at Postal Service facilities.

APPENDIX A. FACILITY LOCATION WORKSHEET

APPENDIX A. Withheld

APPENDIX B. MANAGEMENT'S COMMENTS



UNITED STATES POSTAL INSPECTION SERVICE

Deputy Chief Inspector - Headquarters Operations

April 5, 2004

Mr. Ronald D. Merryman Office of the Inspector General U.S. Postal Service 1735 North Lynn Street Arlington, VA 22209-2013

SUBJECT: Draft Audit Report – Postal Inspection Service's Postal Police Officers (Report Number SA-AR-04-Draft)

This is in response to your Draft Audit Report dated March 8, 2004, *Postal Inspection Service's Postal Police Officers*, and addresses your recommendation to:

Update, document, and validate the methodology used for conducting Security Force Assessment Surveys or use an alternative process that management can validate and document for use in evaluating the presence of postal police officers at Postal Service facilities

We agree with the recommendation and if we continue to rely on this instrument as a tool for assessing our Security Force deployment in future evaluations, we will substantiate the methodology used in the Security Force Assessment Survey. We may discontinue the use of the survey or use an alternative process. In either case, the survey instrument will not be the sole method relied upon to determine the continuance or establishment of an armed postal police presence at Postal Service facilities. As you are aware, the objective of completing a Security Force Assessment Survey is to develop a basis for establishing or maintaining an armed Security Force at a postal facility where there is a clear, definable need. As we commented during the course of this audit, and in our response to Congress, the Security Force Assessment Survey was not and is not intended to supplant managerial judgment and discretion. It is one screening tool we utilized, not the Inspection Service management's sole evaluation instrument.

In addition, your Draft Audit Report failed to consider my input regarding any of the other methodologies used in the decision making process. During working meetings regarding this report, we expressed concern that the appropriate Inspection Service executives were not interviewed as part of your audit plan. As a result, I was subsequently interviewed in this regard. While I sincerely appreciated the opportunity to speak with your staff after that meeting, the lack of any comment on the substance of that interview appears to negate its purpose.

In reference to the 1998 arbitration case involving the closure and redeployment of the postal police from the San Diego, California facility, which is mentioned in the Draft Audit Report, it is important to note our decision was upheld by the arbitrator. During the arbitration, the entire process was discussed including the Security Force Assessment Survey, as well as the other contributing methodologies, such as prior studies and analyses, professional judgment based on interviews with local police, Postal Service managers, the Inspection Service management, and Security Force managers. It is unreasonable to expect an arbitrator's decision would

475 L'ENFANT PLAZA WEST SW, ROOM 3010 WASHINGTON DC 20260-2170 TELEPHONE: 202-268-5425 FAX: 202-268-4563 comment on each methodology used in the decision making process as is inferred in the draft report.

Your Draft Report acknowledged the fact several methodologies were utilized in support of our decision to eliminate armed Security Force officers at six worksites, including, prior studies and analyses, professional judgment based on interviews with local police, Postal Service managers, the Inspection Service and Security Force managers, as well as recommendations from the most recent Security Force Assessment Surveys. Your report notes these prior studies and surveys provided contrasting opinions on whether to maintain an armed Security Force presence at the six sites. You refer in particular the Hallcrest Security Force Analysis which was conducted in 1997.

While this statement concerning contrasting opinions is technically correct, it does not consider the time period that lapsed since the Hallcrest studies were conducted nor the crime prevention counter-measures which have been implemented during the ensuing six-year period. Further, the evaluators failed to consider the physical security control modifications that were implemented in the latest assessments. During previous surveys and assessments, recommendations were made to the Postal Service to enhance the perimeter security with access control technology. The Postal Service responded to these recommendations by installing access control systems in order to control and prevent unauthorized access into postal facilities, thereby contributing to the safe working environment of our employees.

The draft report also fails to comment on the follow-up assessments conducted by the Inspection Service at the affected six worksites. As you know, the results of these follow-up assessments found no significant decrease in perimeter security at any of the six worksites nor any increase in significant incidents after the removal of the armed force. Furthermore, interviews with postal management at these locations revealed a positive opinion of both access control technology and the unarmed contract personnel which were deployed at five of the six worksites in conjunction with the redeployment with the armed Security Force.

You note in the Draft Report the fact OIG evaluators visited the six worksites during the course of the audit and review. The report does not include the purpose of these visits nor the type of review that was undertaken at each. Similarly there are no reported results relative to these visits to the six worksites, the corresponding security review analyses, and results of interviews included in the Draft Report for our review and comment.

We recognize there is a value in continuing to review our use of the Security Force Assessment Survey as a screening tool and identify areas for increasing its efficient application. We feel we have been successful in evaluating armed Security Force resources since the Postmaster General transferred the administrative and functional responsibility for the Security Force to the Chief Postal Inspector. We will continue to evaluate the security needs of the Postal Service based on a synthesis of information.

James J. Rowan, Jr.

cc: Patricia Harris Susan Duchek Lawrence Katz Lawrence Maxwell