

DOCUMENT RESUME

07445 - [C2827933]

Activities of Special Police and Guard Forces in the District of Columbia Can Be Improved. GGD-78-16; B-118638. October 4, 1978. Released October 11, 1978. 3 pp. + 12 appendices (63 pp.).

Report to Sen. Lawton M. Chiles; by Elmer B. Staats, Comptroller General.

Issue Area: Law Enforcement and Crime Prevention (500);

Personnel Management and Compensation (300).

Contact: General Government Div.

Budget Function: Law Enforcement and Justice (750); General Government: Other General Government (P06).

Organizations Concerned: Library of Congress; Supreme Court of the United States; District of Columbia; Government Printing Office; Smithsonian Institution; General Services Administration; Office of Management and Budget; Executive Office of the President.

Congressional Relevance: Senate Committee on Appropriations; District of Columbia Subcommittee. Sen. Lawton M. Chiles.

Authority: Classification Act of 1949, as amended (5 U.S.C. 5101). P.L. 82-379. P.L. 91-34. P.L. 90-610. P.L. 93-175. 40 U.S.C. 13f. 5 U.S.C. 4103. Executive Order 11349.

Since 1789, a number of Federal and District of Columbia agencies have been authorized by the Congress to establish special police or guard forces; in fiscal year (FY) 1977, the Federal Government had 11 forces and the District had 4 forces. These forces, consisting of about 2,800 officers, are independently administered by 14 Federal or District agencies. In FY 1977, it cost the forces about \$48 million, including administrative costs which were not readily identifiable, to provide security for 498 buildings either leased or owned by the Federal or District governments. Findings/Conclusions: Significant differences exist among the agencies in such matters as security of facilities, qualification for employment, training, and salaries. However, security responsibilities and duties are mostly the same. Each force has established certain administrative functions which have resulted in uneconomical and inefficient practices. Standardization of activities and some force consolidation may be possible, but because of Home Rule, consolidation of Federal security forces should not include District government forces. Consolidation is a matter for the Congress to decide. Recommendations: Whether or not consolidation occurs, the following actions should be taken by the Mayor of the District, the Public Printer, the Librarian of the Library of Congress, the Chief Justice of the Supreme Court, the Secretary of the Smithsonian Institution, and the Administrator of the National Gallery of Art: adopt a policy of acquiring goods and services from the General Services Administration (GSA); cooperatively develop standardized equipment and uniforms; seek assistance from the Civil Service

Commission to develop standardized training programs, employment requirements, and compensation levels; and seek assistance from the GSA to develop guidelines for determining appropriate and affordable levels of security. The Director, Office of Management and Budget, should require heads of agencies over which he has jurisdiction to take these actions. (HTW)

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REPORT BY THE

Comptroller General

OF THE UNITED STATES

Activities Of Special Police And Guard Forces In The District Of Columbia Can Be Improved

The proliferation of special police and guard forces in the District since 1789 has caused administrative and operational inefficiencies and unnecessary costs.

Because of the similarity of duties and responsibilities, some consolidation of the forces may be possible and would improve operations and reduce costs. Standardization of personnel, training, procurement, and other practices would help.



GGD-78-16
OCTOBER 4, 1978



COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

B-118638

The Honorable Lawton M. Chiles
United States Senate

Dear Senator Chiles:

As the Chairman, Subcommittee on the District of Columbia, Senate Committee on Appropriations, you requested that we review the activities of the police and guard forces operating in the District of Columbia. (See app. II.) As agreed with your office, we did not verify the data furnished us by the various agencies in the course of the review. Comments of these agencies have been considered in preparing this report.

This report summarizes the results of our work concerning 15 Federal and District special police and guard forces operating in the District (these forces are identified on p. 5 of app. I). Other work you requested, not covered in the report, involving the Metropolitan Police Department and U.S. Park, Capitol, and Metro Transit Police, is in progress.

There has been a proliferation of special police and guard forces in the District since the first force was established in 1789. Of the 15 forces we reviewed, the last one was formed in 1971. These forces, consisting of about 2,800 officers, are independently administered by 14 Federal or District agencies. In fiscal year 1977, it cost the forces about \$48 million, including administrative costs which were not readily identifiable, to provide security for 498 buildings either leased or owned by the Federal or District governments.

As the forces were created, each was legislatively assigned authorities and responsibilities independent of the existing forces. Enabling legislation allowed each agency to establish its own policies and procedures. Consequently, significant differences exist among the agencies in such matters as security of buildings and grounds, qualification for employment, training, and salaries, although security responsibilities and duties are mostly the same. Also, each force established certain administrative functions which have resulted in uneconomical and inefficient practices.

Data we assembled suggests that standardization of activities and some force consolidation may be possible. Because of Home Rule, however, any consolidation of Federal security forces should not include the District government forces. Our recommendations for standardization are set forth below. Although we did not recommend force consolidation, because we believe that is a matter for the Congress to decide, each of the agencies that replied gave its views on consolidation. With only two exceptions, both in the executive branch, the forces covered in this report were opposed to consolidation generally because of the uniqueness of the operations for which security was provided.

There is current interest in consolidating Federal special police and guard forces. If the Congress decides to do this with the forces operating in the District, specific legislation is required. If the Congress decides instead that the forces should be more uniform, authority would have to be provided for the Civil Service Commission to help agencies develop standardized employment and training requirements and for the General Services Administration to help standardize security guidelines, equipment, and uniforms. Also, the President has initiated a project to study the potential for consolidating various Federal activities, including special police and guard forces. The Office of Management and Budget advised us that it is looking into this issue and will consider our recommendations in reaching a final decision.

We are making recommendations that can be implemented whether or not consolidation occurs. The Mayor of the District of Columbia, the Public Printer, the Librarian of the Library of Congress, the Chief Justice of the Supreme Court, the Secretary of the Smithsonian Institution, and the Administrator of the National Gallery of Art should, with respect to special police and guard activities,

- adopt a policy of acquiring goods and services from the General Services Administration,
- cooperatively develop standardized equipment and uniforms,
- seek assistance from the Civil Service Commission to develop standardized training programs, employment requirements, and compensation levels, and
- seek assistance from the General Services Administration to develop guidelines for determining appropriate and affordable levels of security.

The Director, Office of Management and Budget, should require the heads of each of the agencies discussed in this report over which he has jurisdiction to take the actions enumerated above.

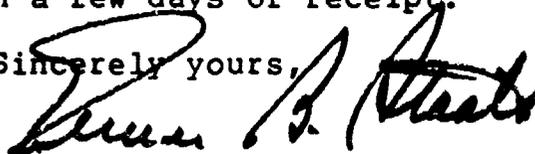
There was general agreement on our recommendations that standardizing uniforms and equipment and buying from the General Services Administration could save money. There was less agreement on our recommendation to standardize salaries, employment requirements, and training, and little overall agreement that the forces should seek assistance from General Services in order to develop guidelines for determining appropriate and affordable levels of security. Again, uniqueness was the agencies' principal reason for not agreeing.

We have not included in the report or responded specifically to the comments of the individual agencies under the Office of Management and Budget's purview, but rather have considered the latter's comments as representing the executive branch. That Office's comments and those of the other Federal agencies and District agencies discussed in the report have been included as appendixes VI to XII, and have been considered in finalizing this report.

The details of these matters are included in the appendixes.

As requested by your office we are making no further distribution of the report at this time. We will, however, distribute it in accordance with our normal distribution policies as soon as you make its contents public, which we understand will be within a few days of receipt.

Sincerely yours,



Comptroller General
of the United States

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ABBREVIATIONS

CSC	Civil Service Commission
FPS	Federal Protective Service
GAO	General Accounting Office
GS	General Schedule
GSA	General Services Administration
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration

ACTIVITIES OF SPECIAL POLICE
AND GUARD FORCES OPERATING IN THE
DISTRICT OF COLUMBIA CAN BE IMPROVED

At the request of the then Chairman, Subcommittee on the District of Columbia, Senate Committee on Appropriations, we reviewed special police and guard force activities in the District of Columbia. Our review explored (1) possible overlapping and duplicating of jurisdictions and responsibilities and (2) the efficiency and economy of standardizing and/or consolidating operations and activities.

The data presented to us during our review was furnished by the various agencies and has not been verified by us. Comments of the 15 forces, the Civil Service Commission (CSC), and the Office of Management and Budget (OMB) have been considered in preparing this report.

SUMMARY

The proliferation of forces in the District since 1789 has caused administrative and operational inefficiencies and unnecessary costs. The similarity of duties and responsibilities for the 15 forces reviewed suggests that standardization of personnel and procurement activities is needed and some consolidation of the forces may be possible. Such consolidation should result in improved operations and reduced costs. Also, management improvements are possible within existing organizations.

BACKGROUND

Since 1789 the Government has employed persons to protect its buildings and grounds. Through the years, a number of Federal and District of Columbia agencies were authorized by the Congress to establish special police or guard forces.

In fiscal year 1977, the Federal Government had 11 forces and the District 4. These forces provided security for 498 government-owned and leased buildings in the city at an annual cost of about \$48 million. Administrative support costs were not readily available and/or identifiable.

Security personnel totaled about 2,800, which included 632 guards hired under contract from private special police organizations. The 11 Federal forces protect 388 owned or leased buildings, and the District forces protect the

remaining 110 buildings. The General Services Administration (GSA) has the largest of the 11 forces with 1,257 guards consisting of 625 sworn GSA personnel and 632 personnel under contract. The buildings that are protected house employees, currency, museum relics, and art objects. A summary description of authorities and responsibilities is included in appendix III.

The map on the following page shows the downtown locations with assigned geographical responsibilities identified for each of the forces, and the schedule on page 5 shows for each of the 15 forces the total expenditures and personnel for the fiscal years 1975 through 1977 (estimated).

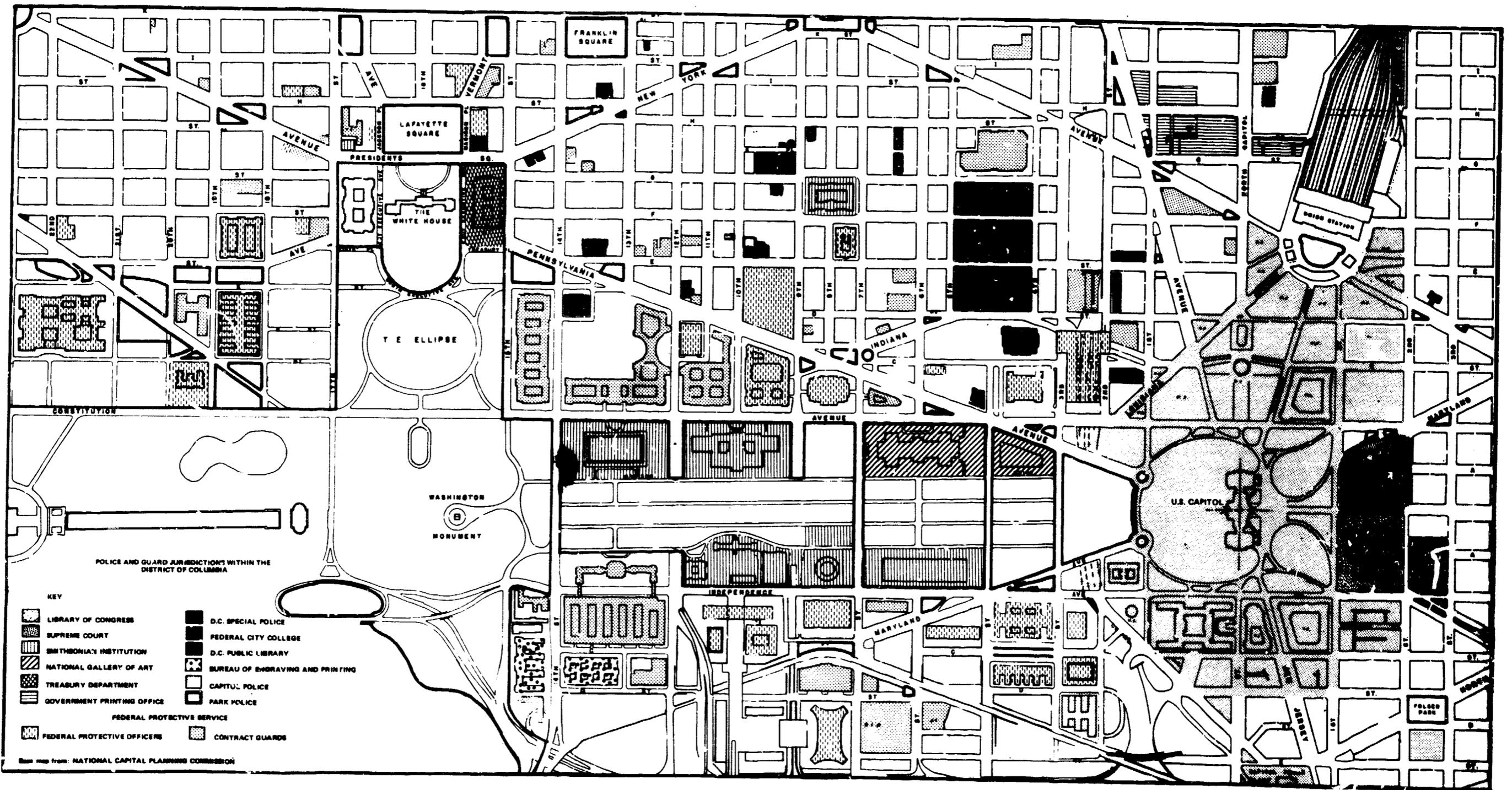
Proliferation of forces and related problems

Since 1789 when the first force was created, Federal and District government special police and guard forces operating in the District have proliferated. The forces we reviewed, 15 in all, are independently administered by 14 Federal or District agencies, each with its own laws and regulations.

As each force was created, it was legislatively assigned authorities and responsibilities independent of the existing forces. The enabling legislation creating the forces set forth broad purposes and allowed each agency to establish its own administrative requirements. Consequently, differences were created in security of buildings and grounds, employment, salaries, and training and administrative functions, such as procurement, even though duties and responsibilities were mostly the same. Also, some agencies obtained special legislation allowing them to recruit personnel at starting salaries substantially higher than other agencies. Agencies with lower salaries experienced difficulty in recruiting and retaining personnel.

Similar duties and responsibilities

Duties of the 15 forces include patrolling agency property, guarding pedestrian building entrances, and performing associated administrative functions such as writing reports. Most of the 23 security and administrative tasks shown on the chart on page 7 are performed by a majority of the forces. One force performed all of the tasks, and three forces performed 22 of them. Each force performed no fewer than 13 tasks. The task least often performed was vehicular patrol of agency property. Only eight forces



**TOTAL AGENCY EXPENDITURES AND SWORN PERSONNEL FOR SPECIAL POLICE AND GUARDS
IN THE DISTRICT OF COLUMBIA -- FISCAL YEARS 1975-77**

Force	Total Expenditures			Number of Sworn Personnel		
	FY 1975	FY 1976	FY 1977 (est.)	FY 1975	FY 1976	FY 1977 (est.)
FEDERAL GOVERNMENT						
Federal Protective Service	\$18,900,000	\$21,559,753	\$23,396,230	731	735	625
Federal Protective Officers				176	327	632
Contract Guards				409	468	468
Smithsonian Institution	5,328,946	6,163,000	7,363,400	185	190	198
Bureau of Engraving and Printing	3,303,000	3,742,000	4,267,000	130	134	173
National Gallery of Art ^{1/}	1,690,587	1,779,767	2,506,000	115	111	117
Government Printing Office	1,719,001	1,709,772	1,682,375	87	95	92
Library of Congress	1,243,397	1,324,709	1,434,666	64	72	69
Treasury Security Force ^{1/}	974,000	1,185,000	1,084,000	54	62	83
Supreme Court ^{1/}	856,000	928,000	1,360,500	40	34	35
St. Elizabeths Hospital	550,377	587,907	625,000	29	31	31
National Zoo	440,000	465,000	480,000	5	8	12
Washington Aqueduct	63,536	121,714	170,000			
Totals -- Federal Government	35,068,844	39,561,622	44,369,171	2,025	2,267	2,542
DISTRICT GOVERNMENT						
General Services	2,706,748	2,934,530	3,008,200	234	189	205
Federal City College ^{2/}	651,766	578,468	632,608	39	36	39
D.C. Public Library	258,902	248,018	136,507	19	16	12
Washington Technical Institute ^{2/}	186,389	201,283	181,552	14	20	18
Totals -- District Government	3,803,805	3,962,2	3,958,867	306	261	272
Grand Totals	\$36,872,649	\$43,523,921	\$48,328,038	2,331	2,528	2,814

^{1/} Represents obligations rather than expenditures.

^{2/} Combined with other educational institutions to form the University of the District of Columbia.

performed this task, an understandable circumstance since most of the property involved could be patrolled by foot. Two other tasks were performed by only nine of the force. The extent to which a specific task is performed varies by force.

Security differences

The level of security at government buildings could vary because of such factors as

- size, configuration, and use of the facility;
- crime rates in adjacent neighborhoods;
- past experience with crime at the facility; and
- number of visitors to the facility.

The forces do not have uniform guidelines that define the level of security required at the facilities and the basis for determining the need and deployment of personnel to provide such security. The factors used in this regard are vague and lack uniformity. Each force uses its own judgment in establishing security levels. As a consequence security differences exist among the forces. For example, the National Gallery of Art determines the need for security personnel on the basis of one guard for every two galleries within the building. The Smithsonian Institution uses the following criteria:

- Daily crime statistics.
- Recent fire damage or needed repairs.
- Accident data or other problems.
- Other information disclosed in a physical survey of of the building.
- Value of items on display.
- Line of guards' vision where stationed.
- Type of objects guarded.
- How the objects are displayed.

TASKS PERFORMED BY SPECIAL POLICE AND GUARD FORCES

Duties of Special Policemen, and Guards in the District of Columbia	Institutions / Organizations														Total	
	Federal Protective Service	Smithsonian Institution	District of Columbia Government	Library of Congress	Treasury Security Force	Bureau of Engraving and Printing	Federal City College	Government Printing Office	Washington Technical Institute	National Gallery of Art	Supreme Court	Saint Elizabeths Hospital	District of Columbia Public Library	National Zoo		Washington Aqueduct
Patrol Agency Property on Foot	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	15
Evacuate and/or Search Building upon Bomb Threat	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	15
Submit Written Reports of Incidents	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	15
Guard Pedestrian Entrances or Exits	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	14
Monitor Electronic Security Systems	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	14
Provide Extra Security for Special Events	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	14
Carry Firearms	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	13
Inspect Packages Entering or Leaving Building	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	13
Check Identification at Pedestrian Entrances or Exits	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Guard Parking Garage Entrances or Exits	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Supervise Parking of Vehicles	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Direct Traffic	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Maintain Fixed Posts at Other than Entrances and Exits	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Inspect Fire or Safety Equipment	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Make Arrests	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	13
Conduct Physical Security Surveys	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	12
Patrol Parking Areas & Notify Metro. Police Dept. of Violations	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	13
Guard Money or Stamps	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	11
Check Identification of Personnel Entering or Leaving Garages	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	10
Issue Central Violation Bureau Parking Tickets	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	10
Perform Public Relations Functions	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	9
Police Cleaning or Delivery Personnel	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	9
Patrol Agency Property by Vehicle	/	/	/	/	/	/	/	/	/	/	/	/	/	/	/	8
Total	22	23	21	22	20	22	19	19	18	18	17	17	15	14	13	

 Task was performed by special police and guard forces.

The National Gallery, by assigning one guard to every two galleries, assumes that each gallery has the same floor area, configuration, number of objects, and likelihood of theft. By comparison, the Smithsonian Institution considers the value of items displayed, type of objects, and how they are displayed in deciding the personnel needs. The following examples illustrate the different personnel needs obtained when using existing security guidelines or criteria for providing similar security.

The National Gallery of Art has two buildings, one of which opened on June 1, 1978; and the Smithsonian Institution has 11 buildings, all located within close proximity of one another in the District. However, the Gallery has 167 security personnel in the older building and the Smithsonian Institution has 453. A comparison on the basis of building size alone shows that the Gallery contains 500,000 square feet of space which it protects with its security staff of 167 personnel; the Smithsonian protects a comparable-sized building with 83 guards.

National Gallery officials said that this description only reflects a typical configuration on the main floor of the Gallery, and that depending on the nature and value of specific works of art and the lines of sight, the density may be greater or less than one guard for two galleries. Smithsonian officials said that a great many of the exhibits at the facility used in the example are susceptible to touch and some can be entered and partially operated, and that in other facilities (including museums and art galleries) most of the exhibits are susceptible to touch. We believe that the comments of the two organizations serve to further highlight the problem of evaluating the appropriateness of the number of security personnel assigned to a facility without guidelines that define the level of security required.

The District of Columbia Department of General Services considered the following criteria to determine the need for security personnel:

- Building use including hours of operation.
- Location of the facility.
- Crime rate at the facility.
- Physical aspects of the building, i.e., access points.
- Number of employees.

Using these criteria, 15 guards are required to provide security for one of the department's buildings. A District General Services official told us that 4 guards are required to protect top officials--City Council members, the Mayor, and their staffs--and 11 guards are necessary for general building security.

Using its criteria, GSA estimated that the District's General Services general building security personnel could be reduced from 11 to 6, providing selected security devices were installed and revised parking and lighting procedures were implemented. In this connection a wide variance exists in the forces' use of electronic security devices, ranging from none at all to extensive use. (App. IV shows the factors considered by each force for security purposes.)

Differences in training

Each of the special police or guard forces provides on-the-job or formal training or both. Some forces attended a centralized training program, others conducted their own, and some did both. Training includes physical fitness and defense tactics, detention and arrest procedures, and firearms use.

The amount of basic training varies among the forces as follows:

<u>Weeks of training</u>	<u>Number of forces</u>
<u>a/0</u>	2
1.6	1
2	1
4	3
5	2
<u>b/6</u>	2
7	1
8	3

a/On-the-job training only.

b/The force has 1-day training for guards and 6-week training for police.

Individual subject areas (e.g., firearms use) for which training was provided also vary. For example, one force that required guards to carry guns provided no formal basic training in firearms use. An official of the force told us such training

was not provided because firing ranges were not available for the guards. Guards in another force were provided firearms training as part of the established centralized training program, but the guards do not carry guns. Five forces provided between 6 and 10 hours of firearms training, seven provided between 22 hours and 28 hours, and one provided 40 hours. The table on the following page shows the total amount of basic training and where it is conducted for each of the forces. The table on page 11 shows the amount of training by type for each of the forces.

CSC officials told us that they have no authority to prescribe standards for training for the Federal and District employees because by statute (S.C. 4103) the head of each agency is responsible for establishing and operating training programs for its employees.

CSC is responsible, pursuant to Executive Order 11348, dated April 22, 1967, for advising the President of ways to improve Federal training programs. In July 1977 CSC advised us that it was working with selected Federal protective agencies to foster development of guidelines for the agencies to follow in establishing protective service training programs. A CSC official told us that District agencies were not included because only those forces with 250 or more officers were part of the study. She said this limitation was imposed to keep the study group to a manageable size.

In February 1978 a copy of the completed guidelines resulting from the study was sent to us. The CSC guidelines identify specific tasks to be learned by police and guards during training sessions in the areas of arrest authority and use of firearms and objectives to be achieved at an interim point and at the conclusion of the training. However, the guidelines do not give any information on the length of time it should take a policeman or guard to achieve these objectives.

Employment qualifications and salary variances

CSC prescribes uniform employment and pay standards for all but five of the forces covered in the study. These five forces consist of one legislative branch force and one judicial branch force and three other Federal establishments' forces, two of which voluntarily adopted CSC's employment and salary standards. The third one adopted the employment standards, but has different starting salaries specified by legislation. However, the other two forces have, by

**WEEKS OF BASIC TRAINING PROVIDED TO FEDERAL AND
DISTRICT GOVERNMENT POLICE AND GUARDS (note a)**

<u>FORCE</u>	<u>Weeks of Basic Training</u>	<u>Training Conducted By</u>
<u>FEDERAL GOVERNMENT</u>		
Bureau of Engraving and Printing (guards)	7	Agency and CFLETC (note b)
Treasury Security Force (special police)	5	CFLETC
Federal Protective Service (special police) (note c)	8	CFLETC
Government Printing Office (special police) (guards)	6 1 day	Agency and CFLETC Agency
Library of Congress (special police)	5	CFLETC
National Gallery of Art (guards)	8 days	Agency
National Zoo (special police) (note d)	8	CFLETC
St. Elizabeths Hospital (special police)	8	CFLETC
Smithsonian Institution (guards and special police)	2	Agency
Supreme Court (special police)	6	Agency and CFLETC
Washington Aqueduct (special police and guards)	0 ^{e/}	Agency
<u>DISTRICT GOVERNMENT</u>		
D.C. Public Library (guards)	4	D.C. General Service
Federal City College (guards)	4	D.C. General Service
General Services (guards)	4	D.C. General Service
Washington Technical Institute (guards)	0 ^{e/}	Agency

^{a/} Does not include on-the-job training (OJT).

^{b/} Consolidated Federal Law Enforcement Training Center.

^{c/} The Federal Protective Service, prior to May 1977, provided its own 6-week basic training program.

^{d/} New recruits could be given a 5, 8 or 12-week course, depending on the amount of prior experience and training.

^{e/} All training is OJT.

**HOURS OF BASIC TRAINING IN SELECTED SUBJECT AREAS
PROVIDED TO SPECIAL POLICE AND GUARDS (note a)**

<u>FORCE</u>	<u>FIREARMS</u>	<u>DETENTION AND ARREST</u>	<u>HUMAN/PUBLIC RELATIONS</u>	<u>FIRST AID</u>	<u>PHYSICAL AND DEFENSE TACTICS</u>
<u>FEDERAL GOVERNMENT</u>					
Bureau of Engraving and Printing (guards)	22	26	16	24	6
Treasury Security Force (special police)	22	22	16	16	6
Federal Protective Service (special police) (note b)	40	12	8	10	29
Government Printing Office (special police) (note c)	24	30	17	20	8
Library of Congress (special police)	22	22	16	16	6
National Gallery of Art (guards)	7	3	3	8	2
National Zoo (special police)	28	30	29	8	8
St. Elizabeths Hospital (special police) (note d)	28	30	29	8	8
Smithsonian Institution (special police and guards)	6	6	4	7	2
Supreme Court (special police)	22	27	16	30	6
Washington Aqueduct (special police and guards) (note e)	-	-	-	-	-
<u>DISTRICT GOVERNMENT</u>					
D.C. Public Library (guards)	}	}	}	}	}
Federal City College (guards)					
General Services (guards)					
Washington Technical Institute (guards)	(d)	(f)	(e)	30	(e)

a/ Does not include any on-the-job training.

b/ Derived from training curriculum prior to switch to the CFLETC in April 1977. Curriculum will now be the same as that for the National Zoo and St. Elizabeths Hospital.

c/ Guards receive 7 days of classroom training and 32 days of on-the-job training, with no specific time frame for these subjects.

d/ Guards do not carry weapons.

e/ Police and guards receive on-the-job training in various courses as determined by supervisory personnel.

f/ Guards do not have arrest authority.

legislation or agency mandate, authorized different employment qualifications and compensation. These two forces employ personnel at higher salaries and with less experience than permitted by CSC.

Employment qualifications--Three agencies hire at the GS-7 entry level, two pursuant to specific legislation and the third pursuant to legislation giving the agency authority to set its force's salaries. (See app. V.) All other agencies are subject to the Classification Act of 1949, as amended (5 U.S.C. 5101 et seq.), and supervised by CSC.

The entry levels and experience requirements for the forces are as follows:

<u>Number of forces</u>	<u>GS grade entry level</u>	<u>Experience (years)</u>
<u>a/7</u>	3	1
<u>a/6</u>	4	2
1	5	3
3	7	0-5

a/Two forces hired at either GS-3 or 4 with 1 or 2 years' experience respectively.

Officials of some of the forces told us that it was difficult to employ qualified individuals when other agencies' employment qualification requirements were less stringent.

Salary variances--Starting salaries ranged from \$7,408 to \$11,690 a year. At the time of our review highest salaries, including supervisors, ranged from \$9,775 to \$28,056 a year. There was no consistency in salary ranges. For example the Smithsonian Institution, the National Gallery of Art, Federal City College, and Washington Technical Institute had the same starting salary of \$7,408, but had maximum salaries ranging from \$9,775 to \$20,177. Similarly, some forces with starting salaries higher than the minimum starting salary cited above had lower maximum salaries. For example, D.C. Public Library had a starting salary of \$8,316 and a maximum salary of \$13,484. (See the tables on pp. 14 and 15 for the details on each force.)

According to some officials, forces paying personnel lower salaries experience low morale and/or high turnover rates. For example, a Federal Protective Service (FPS) report pointed out that it has had major problems retaining highly qualified officers.

FEDERAL AND DISTRICT GOVERNMENT FORCES ENTRY LEVELS, SALARIES, AND EXPERIENCE REQUIREMENTS

Branch of Government and Force	Entry Level		Starting Salary	Experience Requirement		Current Force	
	GS Grade	Authority		Years	Authority	Highest Salary (note a)	Total Officers Force
EXECUTIVE BRANCH							
Bureau of Engraving and Printing (guards)	5	5 U.S.C. 5107 (CSC)(note b)	\$ 9,303	3	5 U.S.C. 5107 (CSC)	\$26,571	192
Treasury Security Force (special police)	4		8,316	2		22,177	68
St. Elizabeths Hospital (special police)	4		8,316	2		18,327	34
Washington Aqueduct (special police) (guards)	4		8,316	2		16,588	8
Federal Protective Service (special police) (guards) (note c)	3	5 U.S.C. 5107 (CSC)(note b)	7,408	1	5 U.S.C. 5107 (CSC)	10,809	6
	4		8,316	2		26,571	602
	4		8,316	-		12,093	23
	3 or 4		\$7,408 or 8,316	1 or 2		13,484	61
LEGISLATIVE BRANCH							
Government Printing Office (guards) (special police) (note d)	5	2 U.S.C. 167	9,303	1.5 ^{e/}		22,177	49
Library of Congress (special police)	7		11,523			20,470	89
Supreme Court (special police) (note f)	7		11,690	0		28,056	76
JUDICIAL BRANCH							
Supreme Court (special police) (note f)	7	28 U.S.C. 672	11,690	0			
OTHER							
FEDERAL ESTABLISHMENTS (note g)							
National Gallery of Art (guards)	3 ^{h/}	5 U.S.C. 5365 (CSC)	7,408	1		20,177	167
National Zoo (special police)	7 ^{h/}		11,523	5		17,592	29
Smithsonian Institution (special police) (guards)	3		7,408	1		16,588	17
	3		7,408	1		18,327	436
DISTRICT OF COLUMBIA GOVERNMENT							
D.C. Public Library (guards)	4	5 U.S.C. 5107 (CSC)(note b)	8,316	2	5 U.S.C. 5107 (CSC)	13,484	12
Federal City College (guards)	3		7,408	1		18,327	44
Washington Technical Institute (guards)	3		7,408	1		9,775	18
General Services (police) (note i) (guards)	-		-	-		(i)	1
	3		7,408	1		22,177	205

d/ Includes top officer(s) or guard(s) of the force(s). For example, the Supreme Court top officer is a Captain or equivalent to a GS-13 whereas the top guard of the D.C. Public Library force is a Lieutenant or equivalent to a GS-6.

e/ The U.S. Code states that each agency shall classify and grade each of its positions in accordance with Civil Service standards.

f/ Since converting to the police series in 1973, FPS no longer hires in the guard series. The salary range is for the guards remaining on the force who were not converted to the police series. GPC does not hire officers directly in this category. Instead, as officers are trained they are converted to the police series. The salary range is for those who have been converted.

g/ Established arbitrarily by Library Director of Security. The Library of Congress special police force is specifically excluded from Chapter 51, Title 5, U.S.C. The Marshal of the Supreme Court is authorized to establish salaries with the approval of the Chief Justice. The salaries were modeled after those of the Capitol Police. The experience requirement does not have any known authorization.

h/ A Civil Service official told us there is no written requirement that the Smithsonian, National Gallery of Art, and Zoo follow Civil Service regulations. However, 5 U.S.C., 5107 has been followed as a matter of practice.

i/ 5 U.S.C. 5365 states that a private's salary should not exceed GS-7 step 5. Zoo personnel have interpreted this as an authorization to hire at GS-7 step 1. The Zoo police are specifically excluded from Chapter 51, Title 5, U.S.C.

j/ In July 1976 the District received Civil Service authorization to convert its personnel from the guard to the police series. However, only one officer has been converted due to budget restrictions. After conversion, the entry level will be GS-4 or GS-316.

**DISTRIBUTION OF SPECIAL POLICE AND GUARDS IN D.C.
BY GENERAL SCHEDULE GRADE OR EQUIVALENT (note a)**

Force	General Schedule Grades													Totals
	3	4	5	6	7	8	9	10	11	12	13			
<u>FEDERAL GOVERNMENT</u>														
Bureau of Engraving and Printing (guards)			142	12	22	10	4		1	1				192
Treasury Security Force (special police)	1	7	42		13		3	1	1					68
Federal Protective Service (special police) (guards)		2	512		60		22		5	1				625
Government Printing Office (special police) (guards)		22	1											23
		58	2	1	6	4			1					110
Library of Congress (special police) (guards)					64	16		8	1					89
National Gallery of Art (guards)	43	81	30	7	5			1						157
National Zoo (special police)			2 ^{b/}	1 ^{b/}	18	6	1	1						29
St. Elizabeths Hospital (special police)			23	5	5		1							34
Smithsonian Institution (special police) (guards)		4	6	6	25	1	7							453
Supreme Court (special police)			266	94	44			65	6	4	1			76
Washington Aqueduct (special police) (guards)	3	3		4	3	1								14
<u>DISTRICT GOVERNMENT</u>														
D.C. Public Library (guards)		9	2	1										12
Federal City College (guards)	5	33	2	2	1		1							44
General Services (special police) (guards)						1								206
Washington Technical Institute (guards)	18	186	12	5			1		1					18
Totals	70	671	912	87	219	35	109	17	10	6	1			2,137

^{a/} Based on the actual distribution of special police and guard; as provided by agency officials between February and April 1977.

^{b/} Hired temporarily at lower grade because of lack of experience.

The question of appropriate levels of compensation in the Federal sector is of long standing. In the course of our work we found that one of the major problems in this area lies in the classification of positions (some of our reports on this matter are discussed below). The appropriateness of the position classification in the various forces reviewed was not a part of this study. Any effort to standardize levels of compensation among the forces discussed in this report would have to first deal with position classification.

Our first report on the white-collar pay comparability process (B-167266, May 11, 1973) recommended several improvements in the design and conduct of the annual survey of non-Federal salaries used as the bases for adjusting General Schedule salaries, including more emphasis on compensation evaluation and research.

In January 1974, the Congress provided CSC funds to study the desirability and reasonableness of (1) subdividing the General Schedule pay system into similar occupation groupings and (2) basing Federal pay rates on local prevailing rates. The grouping would include determining the need and feasibility of a separate classification and pay system for protective service occupations. According to CSC officials, this study would be used to draft legislation to establish salaries for special occupational groups.

In May 1976 we reported (B-179296) that prior reports and studies showed the current pay systems which covered many unlike occupations should be grouped by major occupation. This would result in closer compatibility to market rates and a more rational series of pay rates.

In August 1976 CSC told us it was examining questions relating to the feasibility and desirability of establishing a special service for the protective occupation. A CSC official recently informed us that the study was still in process and should be completed shortly. However, then CSC will begin a more indepth study of the areas identified in the report.

We have also reported that Federal and District law enforcement personnel should be covered by separate Federal and District pay and fringe benefit systems (FPCD-77-71, Jan. 12, 1978). Previously, we reported that present white-collar pay schedules fail to recognize that the labor market consists of distinctive major groupings which have different pay treatments. We said that pay systems should

be designed around more logical groupings (FPCD-76-9, Oct. 30, 1975). We reported also that weak controls and pressures exerted on job classifications have resulted in overgraded Federal positions. We said that top Federal management needed to make a commitment to improve job classifications and to organize the work of Federal departments and agencies economically (FPCD-75-173, Dec. 4, 1975).

A recent report (FPCD-78-60, July 21, 1978) summarized the major shortcomings of Federal pay-setting processes which inhibit pay comparability and have resulted in criticism and a lack of confidence in Federal compensation systems. We reiterated our recommendations for needed legislative reforms in the processes for establishing and adjusting Federal white-collar, blue-collar, and executive level salaries.

Costly procurement practices

Agencies increase costs unnecessarily by not coordinating procurement of similar items. The forces reviewed generally used the same caliber weapons and similar uniform items, although the uniforms were of different quality, fabric, and color.

GSA is the primary purchaser of goods and services for nondefense agencies of the Federal Government. GSA usually can buy goods or services at prices that are lower than those available to an individual agency because purchases are generally made in large quantities. The forces we reviewed are eligible to buy from GSA, but not all are required to do so; we found that procurement practices and sources varied among the forces.

Standardizing equipment and uniforms and centralizing procurement could result in substantial savings. Obviously, centralized purchasing is not possible under the circumstances which exist--that is, nonstandardized equipment and uniforms and individual procurement activity.

Some savings are available immediately, if each of the forces purchases equipment and uniform items currently stocked by GSA. Standardization of equipment and uniforms would allow for even greater savings in that all items could be acquired through GSA. Under the current organizational arrangement of the forces, any decision on the forces' part to give up their prerogative concerning individualized equipment and uniforms and standardize these items will require negotiation among the forces. Coordination among the forces and with GSA would be necessary to assure that required

quantities and quality of equipment and uniforms are available when needed.

Better coordination in procurement could save money--In fiscal year 1976, an estimated \$424,000 was spent on equipment and uniforms. Procurement sources and prices paid for similar items varied. For eight forces that spent about \$397,000 in fiscal year 1976, we were able to identify where cost savings--about \$30,000--could have been realized if purchases of selected items had been made from GSA. The following table shows the items and savings.

	<u>Quantity purchased</u>	<u>Agency cost</u>	<u>GSA cost</u>	<u>Savings</u>
Shirts:				
Long sleeve	1,750	\$10,700	\$ 8,800	\$ 1,900
Short sleeve	4,540	21,600	16,100	5,500
Trousers:				
Summer	220	5,000	3,100	1,900
Winter	470	14,400	7,300	7,100
Raincoats	150	5,200	2,000	3,200
Revolvers:				
4-inch	220	<u>20,100</u>	<u>9,700</u>	<u>10,400</u>
Total		<u>\$77,000</u>	<u>\$47,000</u>	<u>\$30,000</u>

The biggest savings involved 4-inch revolvers. An FPS official told us FPS's latest purchase of weapons was in 1973. The official said the weapons were purchased for an anticipated increase in the force, but the size of the force decreased instead because of the use of contract guards. In 1977 FPS had 510 of these new revolvers in its inventory with a shelf cost of about \$44 each at the same time that three other forces bought 4-inch revolvers, 218 in total, at a cost of about \$92 each. The estimated savings, had the FPS weapons been available to other forces, were about \$10,400. Also, because of nationwide reductions in FPS's force and use of contract guards, it had about 1,000 excess revolvers available for use. An FPS official told us excess weapons were transferred to other forces needing weapons at no cost to the acquiring force.

The remainder of the estimated \$30,000 savings was in uniform items, of which FPS had a substantial supply, while other forces were purchasing like items from other sources.

Currently there is no system in effect to let the purchasing forces know that FPS has weapons or uniforms in inventory, so the forces are unable to avail themselves of savings by acquiring the items from FPS.

An official of one of the forces said that the type of uniforms available from GSA--the type FPS had on hand in substantial quantities--would not wear as well as the uniforms he purchased. An official from another force said that GSA could not handle an increased workload if purchases were made through GSA.

GSA advised us that it had tested uniforms and found that the ones it bought lasted about a year longer than the uniforms similar to those purchased by the other agency. GSA advised also that with an increase of one tailor for each 600 additional officers served, it could handle an increased workload.

Another instance where increased coordination, or at least an increase in the exchange of ideas, could have saved money involved the acquisition of coats by National Zoo Police. In 1974 the Zoo Police saved about \$64 an officer when it decided to purchase and issue a year-round coat with two removable linings instead of issuing a uniform jacket and overcoat as is the normal practice with most of the special police and guard forces. This was a non-GSA purchase, but a GSA official said that he could get the jacket for about \$9 less than the zoo paid. The Zoo Police saved about \$1,980 on the 31 jackets it purchased in 1974 based on zoo prices (\$114 for both the uniform jacket and overcoat). Two other forces that purchased jackets from sources other than GSA could save amounts ranging from \$110 to \$215 per officer if they purchased the year-round coats instead of uniform jackets and overcoats.

CONCLUSIONS

There has been a proliferation of special police and guard forces since the first force was established in 1789, and there are significant and sometimes costly differences in the way in which the forces do their jobs. Creation of independent forces, over time, without regard to existing forces, has been part of the problem. Enabling legislation creating the forces established broad purposes and allowed each agency to set up its own operation and administrative regulations, although duties and responsibilities are mostly the same. Special legislation enabling certain forces to pay higher salaries further complicated the problem.

Some degree of uniformity in operations and administration can be achieved by either changing the individual agency authorizing acts or by administrative action.

For example, employment qualifications and salaries could be made uniform by so specifying in each force's authorizing legislation. Similarly, through administrative action on the part of each force, uniform training requirements and guidelines for determining security needs could be established and standardized equipment and uniforms could be adopted.

Efforts to achieve uniformity through administrative action will have to be coordinated among all forces. CSC and GSA would be two agencies expected to take a leadership role, because of their respective functional responsibilities in the Government--CSC for personnel and compensation and GSA for procurement and supply. The Office of Management and Budget would also need to be involved as the management arm of the Federal Government.

Uniformity in and efficiency of operations could also be achieved through consolidation. Central authority could be vested in one force and one centrally directed and managed force could provide the security expertise for the Government agencies. Some issues would need to be dealt with carefully. Primary among them are salary and training, which have by far the greatest impact on the cost of providing security. The salary levels established and the extent of training provided will be major determinants in whether a consolidated force is more economical than the individual forces.

Any consolidation of forces and amendment of existing legislation to achieve uniformity in employment requirements and salaries is a matter for the Congress to decide, although, because of the Home Rule Act, consolidation of Federal security forces should not include the District government forces.

MATTERS FOR CONSIDERATION BY THE CONGRESS

If the Congress decides that special police and guard forces operating in the District should be consolidated, specific legislation is required. If the Congress does not wish to consolidate the forces, but desires more uniformity among the forces, it needs to

--amend existing legislation to provide for standardized employment requirements and

- provide authority for CSC to help all agencies develop standardized training requirements, and provide authority for GSA to help them develop standardized guidelines for determining security needs and to standardize equipment and uniforms.

RECOMMENDATIONS

In the interim, the Commissioner, Civil Service Commission, should expeditiously complete the ongoing study of Federal protective services employees' pay systems and propose any appropriate legislative changes to the Congress.

The Mayor of the District of Columbia, the Public Printer, the Librarian of the Library of Congress, the Chief Justice of the Supreme Court, the Secretary of the Smithsonian Institution, and the Administrator of the National Gallery of Art should, with respect to special police and guard activities,

- adopt a policy to acquire goods and services from GSA;
- cooperatively develop standardized equipment and uniforms;
- seek assistance from CSC to develop standardized training programs; employment requirements, and compensation levels; and
- seek assistance from GSA to develop guidelines for determining appropriate and affordable levels of security.

The Director, Office of Management and Budget, should require the heads of each of the other agencies discussed in this report to take the actions enumerated above.

AGENCY COMMENTS

This review involved special police and guard forces from the three branches of the Federal Government, the District of Columbia government, the Smithsonian Institution, the National Zoological Park, the National Gallery of Art, and the Government Printing Office.

We asked the Office of Management and Budget to serve as the coordinating point for comments from the executive branch agencies in order that a single executive branch

position could be presented in our final report. OMB responded on May 1, 1978; its response covered the Civil Service Commission, the Federal Protective Service, the Department of the Treasury, and the Department of Health, Education, and Welfare (app. VI). Comments were also received from the Smithsonian Institution (including the National Zoological Park) (app. VII), the National Gallery of Art (app. VIII), the Government Printing Office (app. IX), the Library of Congress (app. X), the Supreme Court (app. XI), and the District of Columbia government (app. XII). A Washington Aqueduct official advised us orally that his agency had no comments on the report.

Force consolidation

OMB is making a comprehensive review of Federal law enforcement missions, tasks, and priorities as part of the President's Reorganization Project. OMB advised that its preliminary analysis should be ready in a few months and that it would share its findings with us. OMB shared the District government's concern over consolidation of Federal and District security functions, but said that consolidation and standardization of Federal security functions was an important question to be considered on its own merits.

While it is not practical to address specifically the comments of each agency, our analysis shows that, with the exception of the Federal Protective Service, and to a lesser degree, the St. Elizabeths force, each agency was opposed to any consolidation of security functions (see p. 25). The District government believed that consolidating its security functions with Federal security functions would not be in keeping with the intent and spirit of the Home Rule Act. The Federal agencies opposed consolidation on the basis of the uniqueness of the operations for which the security was provided. Admittedly the forces reviewed provide security for a wide range of activities involving important operations and valuable items. We do not intend to minimize the importance of any of the operations or of the items for which an agency provides security. We do, however, see the overall security activity as one in which consolidation could be beneficial to the Government as a whole, without jeopardizing the security of the activities or items involved.

We contacted a number of private security forces who advised us that their personnel provide security for a wide range of subjects--inhabitants of buildings, drugs, cash, jewelry, and valuable art works. Some private forces provide security under contract with FPS in Federal buildings

housing valuable Government property and documents. Thus the private-for-profit forces seem to be able to handle security for a wide range of significant, different activities. We cannot foresee where a consolidated Federal security force would pose any serious obstacle to providing adequate security for the Federal buildings and objects. Federal agencies could contract for the service from a consolidated Federal force, just as businesses do in the private sector.

We agree that the District, because of home rule, probably should not be included as part of any consolidation of Federal security forces. Our view is that if a consolidated Federal special police and guard force were established, the District could, under the provisions of the Home Rule Act, acquire special police and guard services from the consolidated force on a reimbursable basis. This would obviate the need for the several separate special police and guard forces currently employed by the District. We believe that the District should study the cost and benefits of consolidating its own forces or contracting for security services.

Not quite as prevalent a reason given for not consolidating was loss of control over the security forces, and the expressed fear that a consolidated security force would not be responsive to the needs of the individual agencies. Obviously, individual agency control would be lost if security functions were consolidated. Whether the responsiveness to agency needs would suffer is a matter of conjecture. An adequately trained, well-disciplined, coordinated security force would be expected to be fully responsive to agency and individual needs within the agency, just as a police department within a city is expected to be responsive to all the needs of the organizations, businesses, and individuals within the city.

Inefficient administration and operations

OMB said it was concerned over the administrative and operational inefficiencies identified in our report, particularly the lack of criteria for defining the requirements for the security and protection of property or facilities and the basis for determining how the criteria can or should be set. OMB said that it would take our findings into consideration in formulating its final recommendations.

The District government agreed with our recommendations concerning acquisition of goods and services from GSA, standardizing uniforms, equipment, and training, and--with respect to the D.C. educational institutions--standardizing salaries and hiring qualifications. The District did not respond to our recommendations to standardize salaries or hiring qualifications for the D.C. Library or D.C. special police, and

none of the District agencies responded with respect to seeking GSA assistance in determining security levels.

The Smithsonian Institution, the National Zoological Park, and the National Gallery of Art did not agree with our specific recommendations, although the comments covering the first two of these agencies indicated some agreement that savings might be obtained if security organizations purchased certain uniform or equipment items centrally or from GSA.

The Supreme Court did not respond to any of our specific recommendations, although the response did raise the issue of separation of powers. The Government Printing Office either agreed with each of the recommendations or said it was already complying. The Library of Congress agreed with our specific recommendations except that it wanted to be sure that standardized training would be limited to basic training; its reply did not comment on standardizing salaries and employment qualifications except to state that the former was established by law and it needed the high qualifications to attract high quality staff.

With respect to the issue of standardization of employment requirements and compensation levels, we pointed out in a prior report (FPCD-76-9, Oct. 30, 1975) that the labor market consists of distinctive major groupings requiring different pay treatments. After review and determination of appropriate classifications by CSC it seems to us that a consolidated special police and guard force could constitute an organization with a distinctive, built-in career ladder. Such an organizational arrangement could minimize the recruiting, morale, and turnover problems attributed to current hiring and pay differences among the existing forces.

In summary, all but two agencies opposed consolidation of special police and guard activities, primarily on the basis that the operations for which they provided security were unique. It is our view that while consolidation is worthy of serious consideration, such consideration will not be forthcoming from the individual agencies, where consolidation would mean loss of staff and of control over the security activity. The current OMB study may result in an executive branch position on this matter. In the final analysis however, we believe that the question of consolidation is for the Congress to decide.

With respect to the specific recommendations, we believe that, if adopted, they will result in less costly security services, whether or not security forces are consolidated.

SUMMARY OF AGENCY COMMENTS

Agency	Consolidate			Buy from GSA			Standardize equipment			Standardize training			Standardize entry requirements			Standardize salaries			Develop security levels with GSA assistance			
	Dis-	Agree	Other	Dis-	Agree	Other	Dis-	Agree	Other	Dis-	Agree	Other	Dis-	Agree	Other	Dis-	Agree	Other	Dis-	Agree	Other	
Executive branch:																						
Office of Management and Budget		X 2/	X		X			X														
Civil Service Commission		X 2/	X 4/		X 4/			X 5/														X 4/
Bureau of Engineering and Printing		X 6/	X		X 7/			X 5/														X 5/
Treasury Security Force	X							X 9/														X
St. Elizabeths Hospital		X 9/			X 7, 9/			X 9/														X 9/
Federal Protective Service		X 5/			X 5/			X 5/														X 5/
Washington Aqueduct																						
Legislative branch:																						
Government Printing Office	X		X		X																	X
Library of Congress	X		X		X																	X
Judicial branch:																						
Supreme Court	X				X 5/			X 5/														X 5/
Other Federal establishments:																						
National Gallery of Art	X				X 12/			X 13/														X 14/
National Zoo	X				X 11/			X 11/														X 14/
Smithsonian Institution	X				X 11/			X 11/														X 14/
D.C. Government:																						
University of the District of Columbia	X		X		X 5/			X 5/														X 5/

1/Does not have special police or guard force but has certain policy and budgetary responsibilities in the executive branch.

2/Federal and District forces should not be combined.

3/Does not have special police or guard force but has certain personnel management responsibilities in the executive branch.

4/Not applicable.

5/No response.

6/Agree with consolidation for the forces whose main responsibilities are in D.C. only.

7/Standardize uniforms but allow different patches and badges for each agency.

8/Standardize basic level training only and allow specialized training tailored to meet individual agency needs.

9/Do not fully agree with the recommendations but will support any congressional actions on the subject.

10/Agency needs high quality officers for the job.

11/Special police force salaries are set by law.

12/Will consider GSA for future weapons purchases.

13/Use year-round uniforms since guards are inside buildings all day.

14/Agency has unique needs.

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United States Senate

COMMITTEE ON APPROPRIATIONS

WASHINGTON, D.C. 20510

May 3, 1976

JAMES R. CALLOWAY
 CHIEF COUNSEL AND STAFF DIRECTOR

The Honorable Elmer B. Staats
 Comptroller General of the
 United States
 U.S. General Accounting Office
 441 G Street, Northwest
 Washington, D.C. 20548

Dear Elmer:

The D.C. Appropriations Subcommittee recently completed hearings on the city's FY 1977 budget request. During the course of those hearings we discussed with Chief of Police Cullinane the fact that there are approximately 25 police forces operating in the District of Columbia. Many of these forces have overlapping jurisdictions and little on-going effort seems to be devoted to coordination of police force activities.

Determining the appropriate resource level of any one police force in the District of Columbia is difficult when the request of one of these police forces is considered in isolation.

This letter is, therefore, to request a GAO audit of the overall police delivery system that operates in the District of Columbia. This audit should cover the following areas:

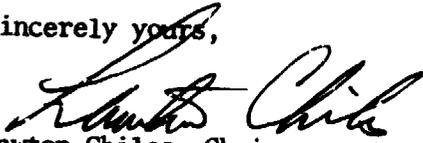
- Background information on each police force that operates in the District of Columbia including budgets, manpower, general authorities, geographical jurisdictions and some of the historical factors that resulted in the creation of each of these separate police forces.
- Information to permit a comparison between D.C. and other cities of the same approximate size with regard to crime rates, unemployment, size of police forces, etc.

Information in the above two categories should be displayed graphically to the extent possible.

- Provide options (including appropriate legislative options) and accompanying discussion regarding possible consolidation actions and desirable coordination measures that should be persused to help insure efficient police services in the District of Columbia and a responsible use of the taxpayers resources.
- Provide data on effectiveness measures used by the Metropolitan Police Department by areas of responsibility to help it determine effectiveness in these areas and how that has changed over time since 1965.

I request that you complete the report as soon as possible, but a preliminary report is required in time to assist the Committee with its mark up of the FY 1977 budget request. Any questions you have, clarification of the scope of the study or any additional information you may need should be directed to Mike Hall of my D.C. Appropriations Subcommittee staff. Mr. Hall may be reached at 224-7220.

Sincerely yours,


Lawton Chiles, Chairman
District of Columbia Subcommittee

CC: Senator John L. McClellan

LC:mhc

ESTABLISHMENT OF FORCESFederal Government

In 1790 the Congress authorized the appointment of a commission to establish a permanent seat for the Government. The employment of six persons to function as night watchmen preceded the formal establishment of the seat of the Government by nearly a year. The Congress replaced the commission in 1802 with a superintendent. That position was abolished in 1816 and the Office of Commissioner of Buildings was created. Between 1849 and 1939 buildings management, including physical protection, was transferred among various agencies. In July 1939 the authority was transferred to the Public Buildings Administration in the Federal Works Agency, and in 1949 the Federal Works Agency functions were transferred to the General Services Administration.

The duties and responsibilities of GSA were to protect a substantial number of buildings occupied by Federal agencies, furnish uniformed guards at such buildings, and operate and manage the force of United States Special Police. In 1971 the force became the Federal Protective Service. The jurisdiction and powers of these special policemen were restricted to Federal property on which the Government had exclusive or concurrent criminal jurisdiction.

Although GSA was authorized overall jurisdiction of the Federal Government buildings and grounds in the District, other forces were created under special legislation or authority. Between 1801 and 1971, the special police or guard forces were established to protect Government property as follows.

Government Printing Office

A Government Printing Office official told us that in 1881 a regular corps of watchmen was employed to protect and preserve the Government Printing Office's property and building. The Office provides printing services for the Congress and Government agencies. In 1970 the guard force was authorized special police powers because the Congress believed the guard force possessed little more authority than any other private citizen. This lack of authority made the force reluctant to settle firmly certain problems and situations which had arisen in the Office. The Congress also believed the District's Metropolitan Police Department had done the best it could over the years, but unfortunately it was not in a position to effectively provide for the safety of the property and people in the area of the Office.

Library of Congress

In 1897, the Library of Congress was removed from the Capitol to a new and separate building where the guarding of its collections became the responsibility of watchmen. In 1950 the Congress authorized the Library to employ special policemen to provide similar policing of buildings and grounds to that which was provided for the United States Capitol.

Supreme Court

On October 7, 1935, the Supreme Court of the United States held its first session in the building it currently occupies on Capitol Hill. At that time, a guard force of 33 men was authorized for the protection of the building and adjacent grounds. In 1949 the Congress authorized the Court to appoint special policemen with positive and unquestionable authority similar to that which was provided for the United States Capitol. In 1973 the Congress increased the authority of the Court special policemen by authorizing them to enforce any law of the District. This authority was restricted to the Supreme Court building, its grounds, and adjacent streets.

Washington Aqueduct

The night watchmen of the Government, established in 1789 and subsequently transferred to the Chief of Engineers, had authority over the Washington Aqueduct. The Aqueduct provides the water supply for 1.2 million District metropolitan area residents. In 1916 the Congress authorized the Corps of Engineers to enforce traffic regulations for the protection of the buildings and grounds of the Aqueduct. This authority was repealed in 1976 and the force now guards only the Aqueduct buildings and grounds.

Treasury forces

The Department of the Treasury was established in 1789, and in 1801 it was authorized to employ security personnel. In 1937 the Secretary of the Treasury delegated to the Chief of the Secret Service the responsibility and authority for providing protection for Main Treasury, the Treasury Annex, the Bureau of Engraving and Printing buildings, and the Bureau of the Mint buildings. In 1953 the responsibility for the supervision of and jurisdiction over the guard force assigned to protect the Bureau of Engraving and Printing and its Annex, including the guard force assigned to the Armored Truck Division, was transferred from the Chief

of the Secret Service to the Director of the Bureau of Engraving and Printing. In 1973, the Director of the United States Secret Service was authorized to appoint special policemen to protect Main Treasury and the Treasury Annex. At the same time, the Directors of the Bureau of Engraving and Printing and the Mint were authorized to appoint their own special policemen for the protection of their respective buildings.

Saint Elizabeths Hospital

Saint Elizabeths Hospital was established to care for the mentally ill, provide curative skills, and conduct research projects. Because of the lack of supporting documentation, we were unable to determine when the hospital security force was established. However, a hospital official told us that the hospital has had a security force since the late 1800s. The official said the force was sworn in annually by the Metropolitan Police Department as special policemen until 1948. This practice was then stopped and the force retained the authority of a guard or private citizen. In January 1975 the hospital was authorized by GSA and the Department of Health, Education, and Welfare to appoint uniformed guards as special policemen for the protection of the hospital buildings and grounds.

Smithsonian Institution

The Smithsonian Institution was created by an act of the Congress in 1846 to carry out the terms of the will of James Smithson of England who had bequeathed his entire estate to the United States. The Smithsonian, as an independent trust establishment, conducts scientific and scholarly research, administers the national collections, and performs other educational public service functions, supported by its trust endowments and gifts, grants and contracts, and funds appropriated to it by the Congress.

In 1882 the Office of Public Buildings and Grounds was authorized to employ four watchmen to protect the buildings and grounds of the Smithsonian. The powers and duties of the watchmen were the same as those of the District's Metropolitan Police. Pursuant to 40 U.S.C. 193n, the Smithsonian was authorized to employ special policemen to police the buildings and grounds of the Institution. The special police were authorized to concurrently enforce, with the United States Park Police, the laws and regulations of the National Capital Parks.

National Gallery of Art

In 1937 construction of the National Gallery of Art was authorized to house the art collections, such as paintings and artifacts, of the Mellon family. The Congress pledged to provide necessary funds for its upkeep including the protecting and care of the works of art acquired by the gallery board. A gallery official told us that in 1941, when the gallery was opened, guards were employed to protect the collections. In 1951 the gallery received specific legislation to employ special policemen to protect its buildings and grounds.

National Zoological Park

The National Zoological Park was established in 1889 for the advancement of science and for the instruction and recreation of the public. About 3,000 animals inhabit the 175 acres of the zoo. The zoo exhibits a broad zoological collection of animals from all parts of the world, maintains an information and education program for the benefit of the visiting public, and promotes scientific research for the benefit of the animals.

In 1890 two watchmen were assigned to the zoo. The men acted as watchmen, animal keepers, and maintenance personnel. In 1891 six men were appointed, as additional privates of the District Metropolitan Police Department, to protect zoo property. From those appointments, the zoo police emerged to its present form as authorized by 40 U.S.C. 193n.

District of Columbia government

In 1899 the Commissioner of the District of Columbia was authorized to appoint special policemen to protect the buildings and grounds of the District government. The Department of General Services is the primary logistics agency for the District. Therefore, protection and security of District government public buildings, owned and leased, and adjacent grounds are the fundamental responsibility of the Department. However, because certain agencies want their own guard force, General Services does not protect all District buildings.

District of Columbia Public Library

In 1896 the District of Columbia was authorized to establish and provide for the maintenance of a free public library and reading room. A librarian was to be appointed to care for and supervise the library. The librarian was responsible for enforcement of rules and regulations of the library and was to appoint necessary assistants to properly conduct the library. Because of this authority, the security of the library was not under the District's Special Police.

In 1909 the Congress authorized the library to employ its own police officers and by 1970, the authorized force increased to eight. In 1970, the library trustees decided to employ the services of a uniformed and trained security force because the branches of the library were being robbed and one guard was shot. The then-existing guard force was unarmed and some guards did not wear uniforms. In June 4, 1970, the library agreed to employ the special policemen of the Department of General Services, and by September 1972 all library guard service was provided by General Services.

On June 26, 1974, the library requested termination of the General Services guard force because (1) sufficient guards were not on duty and (2) guards assigned to the library were not properly trained. Effective August 1, 1976, the library again had its own guard force, but many members of the force were former employees of General Services' special police.

Educational institutions

In November 1966 the Congress authorized the establishment in the District of Columbia of a public college of arts and sciences (Federal City College) and a vocational and technical institute (Washington Technical Institute).

Until 1970, the college's guard force was composed of students, but because the students were often derelict in their duties, General Services' special policemen were employed on a reimbursable basis. In August 1976 the special policemen were discontinued because the college was disturbed over the quality of service provided, which stemmed from (1) the guards not being employees of the college and (2) the college being unable to supervise and reprimand guards. Subsequent to the transfer many of the special policemen remained with the college force and were authorized to retain their uniforms and weapons.

Initially, General Services special policemen were not employed on a full-time basis at the institute. An institute official told us the special policemen were assigned to the institute when students registered and tuition was collected. In 1971, the institute established its own guard force to provide for public safety of students, faculty, administrative employees, and visitors at the institute.

FACTORS CONSIDERED IN DETERMININGLEVELS OF SECURITY

<u>Branch of government and agency</u>	<u>Primary factors used to determine 1/ level of security</u>
Executive branch:	
Bureau of Engraving and Printing	--Security surveys --Audit surveys --Analysis of crime statistics
Treasury	--Need --Number of fixed posts --Number of roving patrols --Crime
St. Elizabeths Hospital	--Need --Entire complex must be patrolled --Certain locations must be covered around the clock
Washington Aqueduct	--Significance of Aqueduct installation --Number of fixed posts
Federal Protective Service	--History of buildings; i.e., thefts --Personnel security --Physical security --Inner security --Existing uniformed protection personnel --Existing intrusion and fire alarm systems --Identification and control of personnel and vehicles --Crime rate
Legislative branch:	
Government Printing Office	--Police stationed at all entrances --High traffic areas --Number of posts and frequency of patrols
Library of Congress	--Hours the building is open --Occupational Safety and Health Administration (OSHA) requirements --Number of posts
Judicial branch:	
Supreme Court	--Need based on whether or not Court is in session
Other Federal establishments:	
National Gallery of Art	--One guard for every two galleries --Every work of art should be in a guard's view
National Zoo	--Past problems in area --Visitors --Crime --Building characteristics
Smithsonian Institution	--Daily crime statistics --Recent fire damage or needed repairs --Accident data and other problems --Other information disclosed in a physical survey of the building --Value of items on display --Line of guards' vision where stationed --Type of objects guarded --How the objects are displayed
District of Columbia government:	
D.C. Public Library	--Number of access points --Hours of operation --Electronic security equipment
Federal City College	--Likelihood of crime --Past experience --Analysis of activity at a building --Special program needs --Physical aspects of buildings and surrounding grounds
Washington Technical Institute	--Fixed and roving posts --Special events --Reserve parking --Emergency situation --OSHA requirements
General Services	--Building use including hours of operations --Location of facility --Crime rate --Physical aspects of building, i.e., access points --Number of employees

¹/The Federal Protective Service and the Smithsonian Institution had written guidelines containing the security factors listed. The other agencies did not and provided the information orally.

SUMMARY OF LEGISLATIONAUTHORIZING SPECIAL COMPENSATION

Section 13f of title 40 of the United States Code authorizes the Marshal of the Supreme Court, under the general supervision and direction of the Chief Justice of the United States, to designate special policemen to police the Supreme Court building, grounds, and adjacent streets. The Marshal told us the special policemen salaries were authorized by the Court and paralleled the salaries of the United States Capitol Police.

Public Law 86-379 (Sept. 23, 1959) increased the salaries of the National Zoological Park Police above the then-authorized General Schedule rates. Public Law 91-34 (June 30, 1969) removed the Zoological Park Police from that pay system and revised the salaries to the present levels. Serious recruitment and retention problems (attributed to salaries considerably lower than other police organizations in the District of Columbia) were cited as reasons for the legislation.

Before 1968 Library of Congress guard salaries were subject to the General Schedule system. Because of difficulties in recruiting and retaining guards, the Library attempted, unsuccessfully, to have the Civil Service Commission administratively approve increases in those pay scales. The Library later proposed legislation to remove the guard force from the General Schedule pay system and to increase salary levels, since its salaries were lower than both the Capitol Police and the Supreme Court Police and the pay scale was not sufficient to recruit and retain guards. Public Law 90-610 (Oct. 21, 1968) removed the guard positions from the General Schedule system and increased the guard salary levels.

Public Law 93-175 (Dec. 5, 1973) increased Library guard salaries to the current rates. In support of the legislation, the Library compared its salaries to those of the Supreme Court, Capitol, and National Zoological Park Police, which were then higher, noting that this situation created a serious morale problem for its guards.

The Director, Administrative Department, Library of Congress, said the Library of Congress guards perform both police and guard duties and suggested including them in the police category. The hearings which supported the most recent salary increase for Library of Congress guards brought

out, however, that the actual duties of the Library guard force were more custodial than law enforcement.

In May 1976 we reported (B-179296) that when one or two agencies receive special pay rates through legislative or other means, a precedent is set. Other agencies performing similar activities then seek similar legislative treatment. The Library of Congress used the special pay rates of other agencies to justify an increase in its salary levels. GSA also attempted to improve the benefits of its Federal Protective Officers through administrative appeals to CSC. General Services cited its lower pay and benefits compared to the Library of Congress and National Zoological Park Police in support of these actions. Thus far CSC and the Office of Management and Budget have refused GSA's effort to upgrade its force's salaries and benefits. However, the effort is still being pursued.



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

May 1, 1978

Mr. Victor L. Lowe
Director
General Government Division
General Accounting Office
Washington, D. C. 20548

Dear Mr. Lowe:

By letter of December 2, 1977, you provided a draft report on the results of the GAO review of special police and guard forces operating in the District of Columbia, and asked me to coordinate agency comments so that a single executive branch position could be presented in the final report.

I am enclosing the Federal agency comments received to date, so that you may have the benefit of their respective positions concerning the findings and recommendations presented in the draft report. Inclusion of these letters does not represent an agreement in all cases.

In regard to the police and guard forces of the District of Columbia government, my letter of October 25, 1977, conveyed our position on your report "Federal and District of Columbia Employees' Need to be in Separate Pay and Benefit Systems." The Office of Management and Budget agreed with the report's primary recommendation that both the Federal Government and the District of Columbia government should control "the nature, level and costs of employees' compensation." This, of course, would not be possible with a consolidated Federal/District police and guard force. We have reviewed the District's letters that have been sent to you and concur in their problems with a consolidated police and guard force.

GAO note: Page references in appendixes VI through XII refer to draft report and may not correspond to pages of the final report.

This is not to suggest that some consolidation and standardization of security functions may or may not be warranted within the Federal Government. This is an important question to be considered on its own merits.

As you know, the President's Reorganization Project at OMB has initiated a comprehensive review of Federal law enforcement missions, tasks, and priorities. Our preliminary findings indicate that at least 27 executive branch organizations are involved in police and preventative patrol activities and at least 47 in property or facilities security/protection (guard) activities.

Our Law Enforcement Study Team has identified property or facilities security/protection as an issue area, and they are developing a preliminary issue analysis at this time. I am advised that this preliminary analysis should be ready within 60 days. As soon as it is ready, I will share our findings with you.

My staff and I are concerned with the apparent administrative and operational inefficiencies and unnecessary costs identified in your report. One of the first things which must be addressed is the present lack of criteria for defining the requirements for property or facilities security/protection, and the basis for determining how these criteria can and should be set. The development of such criteria could cause a fundamental rethinking of how many and what kind of security or protective resources are actually needed for our Government, and how they should be organized. Our final recommendations, which we will also share with you, will take into account these and other considerations, including your findings.

Thank you for the opportunity to comment. OMB looks forward to working with GAO, the Congress, and the Departments and Agencies in solving the problems identified in your draft report.

Sincerely,



James T. McIntyre, Jr.
Director

Enclosures



SMITHSONIAN INSTITUTION

Washington, D.C. 20560
U.S.A.

January 24, 1978

Mr. Victor L. Lowe
Director
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

This letter is in further regard to the General Accounting Office's proposed report entitled "Review of the Activities of the Special Police and Guard Forces Operating in the District of Columbia", which you transmitted to the Office of Management and Budget by letter dated December 2, 1977.

The comments which follow are applicable to the Smithsonian Institution and the National Zoological Park, which is a bureau of the Smithsonian. Although allied to the Smithsonian, the National Gallery of Art has its own Board of Trustees and is responsible for its own administration. For this reason, the comments which follow do not cover the National Gallery.

Not being a Federal agency nor a part of the Executive Branch (please see our letter to you of December 22, 1977 on this subject), it would be inappropriate for the Smithsonian to comment on the security operations of the other organizations covered in the GAO report, or on the question of whether any consolidation of those other security operations would be in order. With reference to the Smithsonian, however, we can state without hesitation our opposition to any such consolidation as it might affect our security activities.

Indeed, with regard to the Smithsonian, we do not believe that the report makes a case with any conviction for consolidation. A central theme of the report is stated most succinctly on page 2 of the draft letter to Senator Chiles, as follows: "...security responsibilities and duties are virtually the same" among the organizations surveyed. The table on page 6 of the draft report is displayed presumably to prove this point.

This table shows that the Smithsonian central security organization performs 22 of the 23 listed security functions, and that the Zoo Police perform a majority of them. (For the record, it should be noted that our central organization performs all 23; it does patrol parking areas and, by issuing Metropolitan Police Department citations in the case of violations, it does notify the MPD.)

What this chart does not show, and what the report apparently does not recognize, is that in many cases the nature of the Smithsonian dictates that we perform those functions in ways substantially different from other organizations surveyed. Our Office of Protection Services and the Zoo Police are responsible for the security of one of the world's largest complexes of museums and galleries and one of its most prestigious zoos, respectively.

While there are undoubtedly some similarities in the way in which security must be approached here and the way other organizations must approach it, the critical difference can perhaps best be summarized by this example, which incidentally intends no invidious comparison: The Federal Protection Service (GSA) has as a primary function that of keeping unauthorized people out of the facilities it guards; the Smithsonian must perform its security tasks while welcoming people in - and in very large numbers (21,000,000 in 1976).

Many of the functions which the report's chart shows we undertake are performed 364 days of each year in the midst of the crowds of our visitors - whom we welcome heartily - which often number in the hundreds of thousands in a single day. Our security forces must therefore act as sources of information as well as guards; and they must not only guard the priceless treasures and interesting artifacts which so fascinate our visitors, but guard and protect the visitors as well, assure their safety as well as their proper behavior, and assist them by maintaining proper crowd control.

The report's attempt to compare the Smithsonian Institution to such other organizations as, say, the District of Columbia Government, Federal City College, WTI, the Supreme Court, St. Elizabeth's or the Washington Aqueduct reveals a certain lack of understanding of what we and those other organizations actually are and do.

The basic misunderstanding of the Smithsonian which the draft report reveals crops up elsewhere. For example, on page 8 the report states: "Most of the exhibits in the National Gallery of Art are susceptible to touching by visitors, whereas most of the exhibits at the Smithsonian facility are not." The "Smithsonian facility" referred to in the report we assume to be the National Air and Space Museum, since the report identifies it as a building comparable in size to the National Gallery with a security force of 83 guards. Actually, a trip through the Air and Space Museum would show a great many exhibits which are

susceptible to touch, and some which can be entered and partially operated.

This problem of the accessibility of our exhibits is a serious one, and one which sets us quite apart from other surveyed organizations. Not only in the National Air and Space Museum, but in the National Museum of History and Technology, the Freer Gallery, the Hirshhorn Museum and Sculpture Garden, the Arts and Industries Building, the National Portrait Gallery and the National Collection of Fine Arts - most of the exhibits are susceptible to touch.

The National Zoological Park presents yet another problem, that of protecting the animals, and on rare occasions of providing protection to the public if an animal gets loose. The Zoo Police are specially trained to assist the animal keepers when necessary - and it has frequently been necessary, especially at night, when the police are alone on the premises. The special problems confronting the Zoo are described in the attached memorandum from the Director of the Zoo to the Smithsonian's General Counsel. Although it was written in 1968 in comment on legislation then being considered to consolidate security forces, it remains a thorough and accurate description of the Zoo's situation, and has the full endorsement of the Smithsonian.

On page 7, the draft report states that the forces surveyed "do not have guidelines that define the level of security required at the facilities and the basis for determining the need and deployment of personnel to provide such security". Yet on the same page, it enumerates the criteria - guidelines - used by the Smithsonian in determining force levels and distribution. Those are our guidelines; they are followed in operation, and they are also used to determine and support budgetary requirements before the Congress.

It is implicit in these guidelines that they be applied in ways appropriate to each bureau of the Smithsonian, recognizing its special needs, problems and the kinds and numbers of people it attracts. Thus, even within the Smithsonian, where we have two security forces, we must take into account substantial differences among our bureaus regarding security matters. The fact that the Zoo has its own security force is an explicit recognition of these differences, and attests to management's policy of adjusting security procedures to meet the needs of each case. If complete uniformity is not possible, and indeed is totally undesirable, within the Smithsonian, it is difficult to see how such uniformity could be achieved as between the Smithsonian and the other organizations surveyed in the report.

In this regard, the report states that "Each force uses its own judgment in establishing security levels." In the Smithsonian this is quite true. Given the Smithsonian's unique nature and legal status, its size and the catholicity of its collections and scholarly endeavors,

we are not aware of anyone else to whom we might reasonably be expected to turn for such judgment. Indeed, the Federal Protection Service has frequently turned to us for advice on providing security for libraries which have been assigned it for protection.

The draft report speaks to the matter of differences among the surveyed agencies regarding training of security forces. Again, the training which we provide is specially adapted to the unique needs of the Smithsonian. In conjunction with an in-house survey made in September 1977 of the Smithsonian's Office of Protection Services, we are currently inaugurating changes in our training programs which will respond even more closely to changes in our needs and in available security technology.

We are well aware of the differences in salaries provided the various forces surveyed. The survey referred to immediately above made substantial recommendations in this regard for the members of the Office of Protection Services. These are currently under intensive review, and we expect that corrective proposals will soon be submitted to the Civil Service Commission for its further action.

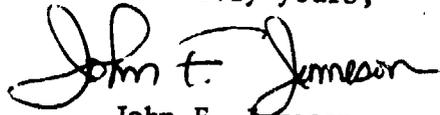
It is possible that, as the report points out, some savings might be obtained if security organizations were to purchase certain items of uniform and equipment centrally, or from GSA. However, the feasibility of the Smithsonian's doing this would depend entirely on the availability of these items in accordance with our specifications, and whatever costs might obtain at the time. In any event, the savings cited by the report hardly seem enough to warrant the massive disruption and greatly reduced responsiveness which would result from the consolidation of Smithsonian security forces with those of other organizations. Indeed, all that would be needed would be a timely exchange of information among the organizations surveyed on the availability, cost and specifications of equipment and clothing; consolidation to achieve the end of modest savings seems quite out of proportion to the problem.

The report appears somewhat thin in support of the arguments regarding savings. For example, we are not yet convinced that GSA would be in a better position than the Smithsonian to determine what kinds of coats best suit our needs. We have a serious responsibility to our protection forces to provide for their comfort, safety and health in the clothing and equipment we procure for them. Even were we not mindful of this responsibility, our union contracts clearly impose it.

In conclusion, we cannot accept the argument, advanced on page 24 of the report, that "Uniformity in and efficiency of operation could also be achieved by consolidation." There is only limited uniformity among bureaus - and hence their security needs - within the Smithsonian, to

say nothing of that existing between us and other organizations. Consolidation, if it tried to impose uniformity, would lead to chaos in operations, not efficiency

Sincerely yours,

A handwritten signature in cursive script that reads "John F. Jameson". The signature is written in dark ink and is positioned above the typed name.

John F. Jameson
Assistant Secretary for
Administration

Enclosure

OPTIONAL FORM NO. 10
MAY 1962 EDITION
GSA GEN. REG. NO. 27

UNITED STATES GOVERNMENT

Memorandum

TO : Mr. Peter G. Powers, SI

DATE: February 28, 1968

FROM : Dr. T. H. Reed, NZP *SHOR*

SUBJECT: HR 14430/14448

In general, the National Zoo subscribes to the basic points made in Mayor Washington's letter.

With reference to the Zoo's specific situation, removal of the Zoo Police from our administrative direction would be a serious loss. Since we could not expect the same kind of special training, orientation, direction, and service from a police unit under external direction, we would be compelled to seek establishment of a substitute service organization to take over those responsibilities not specifically identifiable as law enforcement.

The Zoo Police now have responsibility for a range of activities in the general area of law enforcement, as the daily blotter and monthly summaries indicate. In terms of man-hours, direction of traffic and parking is the largest single item during the visitor season. Daytime patrols protect government property, protect animals from abuse, and protect the lives and property of visitors. Without these patrols, we would have a far higher incidence of vandalism, abuse of animals, thefts from parked automobiles, thefts of government property, and accidents to visitors caused by their own misbehavior.

Conceivably, a police unit under other administrative control would take responsibility for basic law enforcement at the Zoo. If this function were to be performed as effectively as it is now, however, it would require a permanently-assigned and specially-trained group, working on shifts calculated to our fluctuating requirements. The unit would require the same amount of supervision, based in the Zoo, that we now provide. Assignments would have to be equally flexible, to respond to special needs, such as after-hours events.

Detailed knowledge of the Park is required. Further, not every policeman from outside would be willing to accept night work in the Zoo. Night patrols are maintained from gate closing to gate opening. These patrols are of great importance to the Zoo, although law enforcement is not a major problem at night.



Buy U.S. Savings Bonds Regularly on the Payroll Savings Plan

The Zoo Police are trained and deployed to provide a range of services not common to municipal law enforcement. Among them:

1. Information to visitors. Every NZP policeman is an information bureau, directing visitors to exhibits. A policeman will know, for example, the location of a new animal whose arrival has been publicized.
2. Enforcement of park regulations. Our police are aware of special situations, such as the danger of allowing children to sit on guard rails, or the use of slingshots to harass animals.
3. Public safety. The NZP police conduct continuous safety inspections, reporting such hazards as icy walks, overhanging branches, loose railings, potholes in pavements, etc. Corrections are requested from our mechanical services, and checked. The Police operate the first aid station, assisting many members of the public, as well as Zoo employees. All are trained in first aid.
4. Employee safety. The police also maintain continuous inspections for hazards to employees. They inspect fire extinguishers, local emergency first aid boxes, etc. They note and report safety violations, such as improper riding on service vehicles.
5. Special safety routines. For example, the Zoo has a quick-response procedure for snakebites, based on an alarm system which sounds in the Police Station. A parallel procedure is maintained as a 24-hour public service. The Police have access to an anti-venin field kit, which can be on its way in minutes to a requesting hospital.
6. Special weapons. The NZP Police are qualified in the use of special weapons: heavy rifles, .22's, light shotguns, and airguns. Some are for emergencies, such as animal escapes. However, the Police use the light weapons frequently in predator control and other operations assisting the Animal Department.

7. Building security and safety. Night patrols check security of all external and internal doors which are designated as locked. They check for fire hazards such as electrical equipment not shut off. They check building temperatures and are on the alert for such failures as steam-line breaks, water leaks, electrical failures, etc. Outside regular hours, Police have control of the Grand Master Key. They are responsible for releasing vehicles from the garage, unlocking the gasoline pump, and admitting employees on call-in to areas their key series will not open.
8. Emergency call-ins. The Police communications center has a routine procedure for calling in plumbers, electricians and other craftsmen at night and on weekends, where emergency service is required. The Police initiate action on snow removal on nights or weekends, determining when various crews need to be summoned, and calling them in.
9. Animal emergencies. The Police on night patrol are on the alert for animals that appear to be sick or injured, and for other animal emergencies, and call in Animal Department or Veterinary personnel as required.
10. Communications. The Police maintain the NZP communications center. They operate our switchboard, 24 hours a day. We have an internal radio system, giving two-way communication with vehicles and hand units. Radio traffic is not limited to police matters. The Police also operate our gong signal system.

The Zoo requires 24-hour administrative coverage. Duty Officers are assigned on weekends and holidays. They are not necessarily in the Zoo, but are on call, reporting their whereabouts to the communications center.

During daytime hours, the Police station is a principal reception point for many official visitors, since the Administration Building is some distance from the public area. The Police report the presence of official visitors (and unexpected VIP's), for administrative response.

At night, all NZP employees entering the Zoo report their arrivals and departures to the Police center.

Outside office hours, the Police receive all cables and telegrams, as well as telephone calls. Many require immediate action: for example, messages announcing the scheduled arrivals of animals at airports.

11. Accident investigations. The Police, under the guidance of the Safety Officer, conduct all accident investigations, including accidents to employees as well as to visitors.

These are examples of areas wherein the Police provide essential services in addition to law enforcement. Many others could be cited, where the 24-hour availability of Police personnel meets special needs. For example, when an animal shipment arrived at an airport one recent weekend, it was found that the crate would not fit into the vehicle on the scene. A policeman was able to drive a larger van to the airport within the hour.

All of these essential services require men who have been trained at the Zoo, and who are familiar with Zoo personnel, animals, buildings, and practices. Further, they require that the division providing these services be an integral part of the Zoo organization, and under the direct and immediate direction of Zoo administration.

A police force not under our direct control, and not trained by us, could not perform these services. It would seem wasteful to divide responsibilities, having one unit responsible for law enforcement only, another responsible for the services outlined above.

We are therefore strongly opposed to the proposed legislation.

JP/THR:dlh



SMITHSONIAN INSTITUTION

Washington, D.C. 20560
U.S.A.

December 22, 1977

Mr. Victor L. Lowe
Director
General Government Division
U. S. General Accounting Office
Washington, D. C. 20548

Dear Mr. Lowe:

We have received a copy of your letter of December 2, 1977, to Mr. James T. McIntyre, Jr., Acting Director of the Office of Management and Budget, which transmitted your office's proposed report entitled "Review of the Activities of the Special Police and Guard Forces Operating in the District of Columbia." Your letter to Mr. McIntyre requested that his office consolidate comments on the report of certain agencies audited, including the Smithsonian Institution, the National Zoological Park, and the National Gallery of Art "so that a single Executive Branch position can be presented."

As I am sure you know, the Smithsonian Institution is a public trust established to carry out the will of James Smithson, an Englishman. The Institution is not part of the Executive Branch. Therefore, it appears more appropriate for us to send you directly our comments on the draft report. We have discussed this revised reporting procedure with Mr. William Russell of the Office of Management and Budget and Mr. Frank Medico, Assistant Director of your General Government Division. They find this procedure satisfactory.

Our preliminary review of the draft report indicates that we will have substantive comments to offer. We are in the process of making a more definitive review, and these comments and suggestions will be forthcoming by separate letter.

Sincerely yours,

A handwritten signature in black ink, appearing to read "John F. Jamison". The signature is written in a cursive style with a large, looping initial "J".

John F. Jamison
Assistant Secretary
for Administration

National Gallery of Art

*Washington, D.C. 20565
Telephone: (202) 737-4215
Cable Address: NATGAL*

May 17, 1978

Dear Mr. Lowe:

I am pleased to offer the following comments on the General Accounting Office's draft of a proposed report concerning "The Activities of the Special Police and Guard Forces Operating in the District of Columbia."

We cannot agree with the underlying premise of the draft report, namely that there is substantial similarity among the responsibilities of the organizations surveyed. Specially, we believe that art museum security involves duties and responsibilities which are decidedly different from other types of guarding activity. The primary purpose of the guard force in the Gallery is to protect the works of art against vandalism, theft, fire, etc., and to protect the visitors and building itself. Many gifts and loans have come to the National Gallery largely because of its stringent security program. Our guards not only provide surveillance, but they must be experienced in crowd control and knowledgeable about the collections. Those serving at entrances are also expected to know the various public transportation routes and the schedules of the many visitor attractions in the Mall area.

With reference to specific items, the statements at the top of page 8 and in Appendix 3, page 37, concerning the assignment of guards is misleading and only reflects a typical configuration on our main floor. Depending on the nature and value of specific works of art and the lines of sight, the density may be greater or lesser than one guard for two galleries. In some instances, such as when the Mona Lisa was on loan, we provided a guard for a single item. In the Chinese and Tutankhamun Exhibitions there were several guards in just one gallery because of interrupted sight lines and huge visitor throngs. The comments concerning training do not give adequate recognition to the specific knowledge needed by museum guards concerning the building(s), the museum's contents, the alarm systems, the closing procedures, etc. which would be unique to a particular gallery or museum. Knowledge of the passive electronic systems must be strictly controlled on a need-to-know basis.

In fact, these information items are a primary component of our training program. Therefore very little of our training would be transferable or obtainable from others, although we work closely with the Smithsonian Institution in improving the more general parts of our training. Our respective training and range officers are in constant touch since the Smithsonian regularly uses our range facilities.

While greater standardization may be possible, our uniform, for example, was specifically designed to be a light-weight, year-round garment satisfactory under our specific temperature and humidity conditions. The weight, quality, and appearance of our uniforms are important morale and public image factors. Similarly, we have a single long-sleeved shirt of a weight which does not require different shirts for different seasons. We feel strongly that a white shirt gives the neatest appearance and least "conflict" with the works of art. The draft report does not appear to evaluate the single vs. seasonal uniform cost implications or to recognize the morale factor involved in uniform design for particular installations. On the matter of weapons, I believe it will be years before we replace more than an occasional weapon, but we can check on availability through the General Services Administration should additional weapons be required.

I have read the letter of January 24, 1978, from the Assistant Secretary for Administration of the Smithsonian Institution, and insofar as it refers to the Smithsonian's museum guarding (as distinct from the Zoo policing) I concur in the additional points made therein which have not been addressed in this letter.

In conclusion, we believe that museum guarding activity generally and guarding activity at the National Gallery specifically is sufficiently unique to argue against consolidation. Thank you for your consideration of my comments.

Sincerely yours,


Joseph G. English
Administrator

Mr. Victor L. Lowe
Director
General Government Division
U.S. General Accounting Office
Washington, D.C. 20548



United States
Government
Printing Office

Washington, D.C. 20401

OFFICE OF THE PUBLIC PRINTER

December 20, 1977

Mr. Victor L. Lowe
Director, General Government
Division
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

I believe consolidation of the Government Printing Office's (GPO) special police and guard activities with others would not be in the best interests of the Government. GPO is unique in its operations for this area: (1) it is a manufacturing type of operation with trucks and supplies constantly on the move; (2) it handles National Security items as well as passports; (3) it has agreements with craft and other unions providing specific protective services to employees; and, (4) it is located in a relatively high-crime area. Accordingly, your draft report does not completely address itself to these special problems.

Following are our comments to specific recommendations made in the draft report.

Recommendation

With respect to special police and guard activities, the Public Printer should:

- adopt a policy to acquire goods and services from GSA,
- cooperatively develop standardized equipment and uniforms,
- seek assistance from CSC to develop standardized training programs, employment requirements and compensation levels, and
- seek assistance from GSA to develop guidelines for determining appropriate and affordable levels of security."

Comment

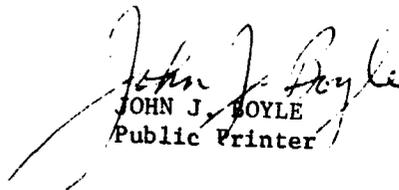
- We have never hesitated to acquire goods and services from GSA whenever prices are advantageous and delivery schedules meet our needs.
- We welcome any coordination with other special police and guard forces regarding standardized equipment and uniforms.
- We have always considered the CSC as a source for training programs, employment requirements and compensation levels and will continue to do so.



--We shall seek assistance from GSA whenever necessary to develop guidelines for determining appropriate and affordable levels of security.

I appreciate the opportunity to comment on this draft report before its publication.

Sincerely,


JOHN J. BOYLE
Public Printer



THE LIBRARY OF CONGRESS

WASHINGTON, D.C. 20540

ADMINISTRATIVE DEPARTMENT

December 23, 1977

Dear Mr. Lowe:

This is in answer to your letter of December 2, 1977 addressed to the Librarian of Congress requesting the Library's response to the General Accounting Office draft report entitled, "Review of the Activities of the Special Police and Guard Forces Operating in the District of Columbia." The draft report contains four specific recommendations on page 25 to which we are pleased to respond as follows:

1. The Library procures uniforms, equipment and other available items through GSA.
2. The Library currently uses the GSA uniform shop and would have no objection to cooperative development of standardized equipment and uniforms.
3. The Library uses the Federal Law Enforcement Training Center for standard basic training for its Special Police Force. However, the Library has special needs which require specialized training that is only available here at the Library. We address other portions of recommendation No. 3 at greater length below.
4. We agree in principle to this recommendation. The Library now obtains assistance from GSA in situations in which security systems are in leased space, and uses the GSA manpower allocation formula to establish manpower requirements.

The Library takes exception to certain elements of the draft report. The Library's Police Act is similar to the Capitol Police Act and the Supreme Court Police Act. The space covered by these Special Police is contiguous and cooperative work measures do exist. The great value of the Library's collections, the level of users of the collections including Congressmen and other high government officials, and the number of tourists and visitors (well over a million people a year), all require special procedures and training.

The Library of Congress, as the national library, has collections which are of inestimable value. The Special Police are responsible for guarding these collections, which have been built up for over a century and a half and contain many rarities. Close attention must be given to prevent the defacement or mutilation of items in the collections or on exhibit. There are 17 general and special reading rooms open to the public where the Special Police must exercise general surveillance.

In addition, there is a continuous danger of loss by theft of items from the Library's collections. Library materials, especially unique manuscripts, are far easier to conceal and remove than, for example, a painting. The Library averages over 1,500,000 visitors each year, and the police must be extremely alert, particularly during periods of heavy exodus, to scrutinize all materials being withdrawn from the buildings in order to thwart attempted thefts and to prevent the withdrawal of materials without the proper pass. This must be done in a tactful and courteous manner so that visitors will not be offended in any way. Each officer must have a high degree of specialized training to recognize the great diversity of formats and identification markings of Library materials to assure their protection. Recruitment standards are set deliberately high in the Library of Congress and we feel that we must maintain these standards under the authority provided to the Library by statute as to compensation level and related matters. This is doubly emphasized in that basic statutory language for the Library places on the Librarian of Congress responsibility for safeguarding the Library's collections. Given the Library's requirements, it seems likely that government-wide consolidation would inflict on the Library of Congress a lack of efficiency and economy and the potential for overlapping and duplicating jurisdictions and responsibilities rather than the reverse. The Library of Congress would need to use its own staff in performing some functions if a consolidation under GSA were to be directed.

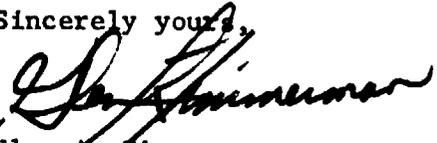
Your attention is called to the following specific points in the proposed report:

Page 6. The Library of Congress Special Police do patrol parking areas but do not have to call upon the Metropolitan Police Department to issue parking tickets since they have the authority to do so and tickets are issued when circumstances require. The Library of Congress Special Police do police work. They conduct investigations of criminal offenses which occur within the Library of Congress buildings or on the grounds, they prepare affidavits in support of arrest warrants, present them to the proper judicial

authorities for review, and, if the warrant is issued, make arrests and appear in the courts as witnesses. They are referred to as Special Police under the Library's statutes and under our regulations. In some instances in the subject report they are erroneously referred to as "guards."

Thank you for the opportunity to review the draft report which is returned herewith.

Sincerely yours,



Glen A. Zimmerman
Acting Director

Enclosure

Mr. Victor L. Lowe
General Government Division
General Accounting Office
Washington, D.C. 20548

**Office of the Marshal
Supreme Court of the United States
Washington, D. C. 20543**

February 23, 1978

Mr. Victor L. Lowe
Director, General Government
Division
General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

Reference is made to our letter of January 6, 1978 regarding comments with respect to your draft report on special police and guard forces.

The above letter outlined our position on consolidation of the police forces and the possible constitutional separation of powers aspects present.

While we appreciate the opportunity to comment further on your draft report, we have no further response at this time.



Alfred Wong
Marshal

*Office of the Marshal
Supreme Court of the United States
Washington, D. C. 20543*

January 6, 1978

Mr. Victor L. Lowe
Director, General Government
Division
General Accounting Office
Washington, D.C. 20548

Dear Mr. Lowe:

The Chief Justice has directed me to respond to your letter and draft report on special police and guard forces.

We have read with interest your draft report and recommendations. The latter is under study at the present time.

The matter of a possible consolidation of the Supreme Court Police is one of great concern and our views will be imparted at the appropriate occasion. My impression is that The Supreme Court would not look favorable on merging its security force with any other entity. I am, of course not competent to evaluate the constitutional separation of powers aspects but they are surely present.

Sincerely yours,



Alfred Wong
Marshal



THE DISTRICT OF COLUMBIA

WALTER E. WASHINGTON
MAYOR

WASHINGTON, D. C. 20004

FEB 6 1978

Mr. Victor L. Lowe, Director
General Government Division
U. S. General Accounting Office
441 G Street, N. W.
Washington, D. C. 20548

Dear Mr. Lowe:

The following additional comments are hereby submitted in response to the draft GAO report on the special police and guard forces operating in the District of Columbia. This supplements the views and comments expressed in my previous letter dated January 12, 1978. I understand that the Chairman, Board of Trustees, University of the District of Columbia, responded directly to you on the draft report.

Your draft report appears to advocate that all the special police forces, Federal and District Government, be combined into one force. If this understanding is correct, then I must oppose the conclusion for the reason that it is not in keeping with the intent and spirit of the Home Rule Act. Furthermore, such a consolidation would be inconsistent with the conclusions and recommendations of the Comptroller General in his recent report entitled "Federal and District of Columbia Employees Need to be in Separate Pay and Benefit Systems." I suggest that this point be specifically clarified in the final report.

In contrast to a centralized security force, agencies with their own guard forces have experienced certain added benefits. The guards in order to be more effective in their jobs must be more knowledgeable of their agencies' unique operations. Through the

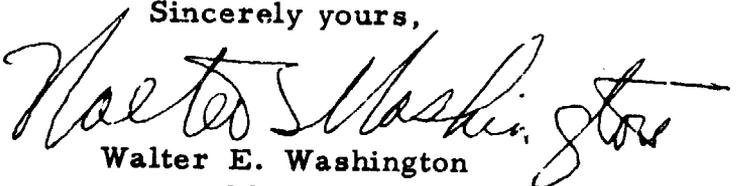
closer relationships of agency guards, they are able to become more familiar with the building layouts and the individuals who use the facilities. They are also able to more readily recognize unfamiliar individuals and respond more promptly to potentially dangerous situations.

Another important factor which cannot be evaluated in terms of money is the esprit de corps that goes with being an integral part of an organization--the feeling of identity with its purpose and goals which gives satisfaction to the job being performed. It provides the intangible qualities of motivation, dedication and pride in the particular place where one works.

As stated in my previous letter on this draft report, we are continuing to strive for greater economy and efficiency in our operations. In those instances where consolidated methods offer opportunities to achieve this objective, as appears to be the case with procurement and training for the special police, we are working toward implementation of these methods.

Thank you again for permitting me to review the report in its draft form and provide our comments. I hope they will be helpful to you in finalizing the report.

Sincerely yours,



Walter E. Washington
Mayor



THE DISTRICT OF COLUMBIA

WALTER E. WASHINGTON
MAYOR

WASHINGTON, D. C. 20004

JAN 12 1978

Mr. Victor L. Lowe
Director, General Government Division
U.S. General Accounting Office
Washington, D.C. 20548

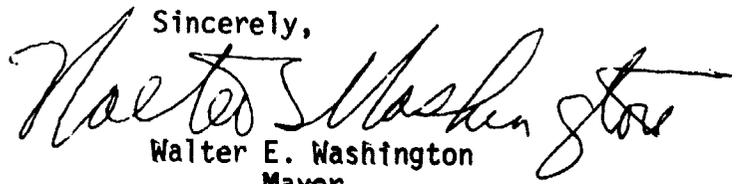
Dear Mr. Lowe:

You solicited my comments on the draft GAO report on the special police and guard forces operating in the District of Columbia. Of the fifteen forces studied, three are in the D.C. Government; Department of General Services, D.C. Public Library, University of the District of Columbia (combines Federal City College and Washington Technical Institute). My comments are as follows:

The principal conclusion of the study is that all the special police forces, Federal as well as D.C. Government, should be combined into one force. I cannot agree with this conclusion. First of all, the problems relating to funding and personnel regulations would appear to override any possible advantage. But even more fundamental is the matter of operational control. A police force must be immediately responsive to the agency it protects. In times of crisis, decisions must be made immediately. If these decisions must be made by elements outside the District Government, the effectiveness of the force will be greatly reduced. In fact, a decision has been made within the District Government to grant D.C. Public Libraries and the University of the District of Columbia their own special police. These agencies had received special police protection from a centralized force in the Department of General Services. Their satisfaction with the problem of achieving operational control in dealing with their unique needs led to the establishment of their own separate forces. I see no reason to return to the previous situation.

I do believe that there is room for working toward uniformity with training, procedures and equipping of special police forces. The Department of General Services with the D.C. Government has worked with GSA in preparation of training programs and training standards. We would be happy to include our special police forces in a cooperative effort to achieve greater efficiency and economy of operations.

Sincerely,



Walter E. Washington
Mayor

Board of Trustees

University of the
District of Columbia

1025 Vermont Avenue, Suite 606,
Washington, D.C. 20005 • 202-727-2600

January 30, 1978

Mr. Victor L. Lowe, Director
General Government Division
General Accounting Office, U. S.
441 "G" Street, N. W.
Room 3866
Washington, D. C. 20548

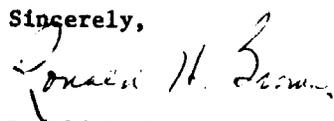
Dear Mr. Lowe:

The draft report of the United States General Accounting Office on the Special Policy and Guard Forces operating in the District of Columbia has been reviewed by the administration of the University of the District of Columbia, and the Board of Trustees strongly endorses their views in this regard.

The report's recommendation that salaries, training and qualifications be standardized for all security personnel is supported. It would eliminate the sometimes intense competition to attract and retain highly qualified personnel among the agencies and correct unfair advantages such as higher starting salaries which presently exist at some agencies. It is agreed with the report's findings that this could be best accomplished through the legislative process.

Exception is taken to the recommendation that all standing security forces should be merged into a single organizational structure. This suggestion does not take into account the widely different environments in which each security force must serve, and this is particularly important for the University of the District of Columbia. It is widely understood that the security force for a university campus must be under the direct supervision of administrators who are sensitive to academic settings and student concerns. Accordingly, we recommend that the University of the District of Columbia be excepted from a single City security organization. To do otherwise would be administratively unsound and counter productive for the University.

Sincerely,


Ronald H. Brown
Chairman

(42940)