

# The Protection Ranger

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The Newsletter of the National Park Rangers Lodge, Fraternal Order of Police



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## President's Message

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A safe and happy 2014 to all! Here's a long overdue review of reform – or, more often, the lack of it – following several outside studies and recommendations made over the years. We wanted to publish this to bracket where we are and how far we still have to go in our pursuit of full LE professionalism. Among other goals, pressuring WASO to implement many of the more important and long – long! – overdue changes will be on our agenda in the coming year.

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## Epic Fail: Law Enforcement (Non)reform in the NPS

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In the last 43 years, the NPS has had two reviews of its law enforcement program by the International Association of Chiefs of Police (IACP) and a review by the DOI Office of the Inspector General in 2002. These reports created a road map for reforming the program to increase employee safety and agency efficiency.

That's 10 budget cycles the NPS has had to make changes recommended by experts to address safety concerns in the field. NPS has had more than a decade to develop professional standards and fix the problems identified by the field and endorsed by experts to make the NPS more efficient and safer for employees.

Two words can describe the results of that reform effort: Epic Fail.

Symbolic changes have been made, and a few people have received nice promotions. For the hundreds of rangers in the field the results of reform aren't perceptible because, for the most part, they never happened. Seasonals still pay for their own inadequate training, work without backup, then spend the winter collecting unemployment while the NPS continues to violate the spirit of the Hudson law in order to keep the status quo (*See Page 9 for more on the Hudson Law*). Quality control for hiring is nonexistent, and the potential for tragic incidents has not diminished.

The NPS has been successful with bamboozling the field by all kinds of stratagems in order to prevent meaningful reform. In dire economic times, rangers are less willing to speak out for fear of having their career paths shortened.

It's time to examine the failures of the past and how we've let the NPS get away with pulling the wool over our eyes when it comes to meaningful reform.

It's also time to fix the root causes that block reform, because it's obvious that the current system is dead set against it. It's time for real change.

## True Reform Begins With Real Change

Law enforcement reform was blocked because NPS directors and most in the National Leadership Council wanted to block it. They allowed some phony reform measures to pass through to mollify the Inspector General and the field, but prevented

the serious reform that they were afraid of, then let other efforts die a quiet unpublicized death.

So where does true reform begin? Let's first start with a law enforcement chain of command from the Chief Ranger at WASO directly to the Chief Rangers in the parks. The last IACP study called for this if the NPS could not get its act together. There is more than ample evidence to show that the NPS has failed to do so. (Actually, the draft version of the IACP report obtained by the Lodge called for stovepiping. However, the NPS insisted that this version be changed. The compromise was found in the final draft – stovepiping if the NPS failed to make the current system work. It doesn't. It's time to change.)

The Special Agent program, created as a result of the IACP program, shows that in fact "stovepiping" is fully workable within the NPS. US Park Police presence in National Parks also shows that parks function well with a law enforcement component that has a separate chain of command. Don't let Regional Directors tell you that parks can't function in a stovepiped environment. Regional offices function with US Park Police Captains working in them. The supervisor of the Captains is the stovepiped US Park Police Major in WASO, who reports to the Chief.

That's right, stovepiped employees work in WASO, work in regional offices, work in parks, and work as agents.

In fact, the NPS has stovepiped many other branches of its operation, from firefighting to procurement to personnel, in addition to key elements of its law enforcement operation, and the world has stubbornly failed to end.

The reality is that the NPS has never come close to laying out a coherent case for each superintendent running his own LE show. Stories of pending doom abound, but the end of the world did not come in 1976, it didn't come when rangers got semi-auto pistols or AR-15s, or body armor, or agents got stovepiped. A professional law enforcement program will not be the end of the world. The real danger lies in "make it up as you go along" and "LE materials from WASO are mere guidelines" and the dangers of management of law enforcement by people with four and a half days of training in law enforcement management.

NPS management has failed the field, failed professional reform, failed the taxpayer, and failed the park system.

By fixing the big picture first, we can begin to fix the details. By ignoring the big picture, the NPS has failed to make significant reform. If we continue to ignore it, the failure will continue.

### **Secondary Changes**

With a commitment to professionalism and a chain of command to allow this to happen, we can start fixing other things, and adding procedures that will professionalize the ranger job.

High on the list would be closing down the seasonal academies, which have offered a limited and varied curriculum, and send new hires to FLETC. The Lodge realizes that many parks have a need for rangers who will work less than 52 weeks a year. As per the "Hudson Law", these rangers would be subject to furlough with pension and health benefits.

Also on the list is developing a professional hiring program where rangers are recruited and selected in an intelligent, efficient manner.

### **We've Been Bamboozled**

Since 1976 the NPS has fought professional management of law enforcement every step of the way, placing the public and rangers at greater risk.

One can look at the Associate Director's office in an attempt to cast blame for this, but in fact responsibility must lie with the Director, Comptroller, and the Department of the Interior. If true law enforcement reform was on their agenda, they would have requested funding from Congress for it, set goals for it, and held people accountable for it. DOI would have stuck to its former DM-446 policy of eliminating seasonal law enforcement, instead of buckling to NPS pressure and changing DM-446.

"But we can never afford this." This has been the broken record response to law enforcement reform since the very beginning. Of course the reason that the NPS can't afford this is that it has never asked for the money. While money is tight these days, it's not too difficult to recall the post-911 days of spending on law enforcement and homeland security – a perfect time for the NPS to request funding for the safety recommendations made by the IACP. This didn't happen.

Hindsight can also take a look at other NPS spending during the same time period and see where the NPS placed its priorities. It wasn't on the safety of its law enforcement employees.

So let's translate "we don't have the money" into "we don't want to make the changes, so we never ask for the money, so we don't have the money." When are you going to get the message, Mr. Jarvis, and come clean and do right by the rangers?

When the Lodge's recommendations are put into effect we will have a properly trained ranger force and be the professional law enforcement entity the national parks need.

It's time to fix the big picture – the structure of the NPS law enforcement program. Without this, we're doomed to dealing with the same issues over and over again with little or no progress. With restructuring, and the right people in place, there is a chance for reform.

Without it, expect nothing but excuses and "reorganization" efforts that merely reshuffle the deck chairs on the foundering NPS law enforcement program.

### **How Do We Bring About Reform?**

We need to hold NPS leadership accountable for their failures, in a quite public way. We need to get public pressure, pressure from Congress, pressure from the IG, and from concerned groups, as well as the National FOP.

Such failure to safeguard employees is inexcusable.

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## **Scorecard of NPS Implementation of IACP and DOI-OIG Recommendations**

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### **IACP Recommendations**

**Recommendation:** Create the position of Associate Director for Emergency Services and Law Enforcement.

**Grade: Pass**

The NPS did create this position quickly after the report, so credit is due. It should be also noted that the NPS down-graded the top two LE positions below the AD from the 1811 series to the 0025 series, meaning a cut in pay because of lack of LEAP. One step forward two steps back.

It's one thing to create the AD position, but quite another to give the position resources, authority, and a mandate for effective in reform. This is a classic example of cosmetic change without any meaningful long-term change.

**Recommendation:** Create a tiered structure of law enforcement goals and objectives.

**Grade: Fail**

There is no functional effective program for this in place.

**Recommendation:** Revisit park superintendent law enforcement accountability requirements and protocols.

**Grade: Fail**

This never happened (you're going to be hearing this a lot.)

**Recommendation:** Reestablish a system of strict and frequent park law enforcement audits.

**Grade: Fail**

This wasn't done either. Some regions audit parks more than others, but the results stay in the region, and are not forwarded to WASO. This is in direct violation of DOI policy, which states that the Agency Law Enforcement Administrator is to be in charge of this. There is no national policy on which parks get audited, or how often. And strict? When's the last time you've heard of anyone getting in hot water over an audit?

**Recommendation:** Increase the current complement of law enforcement rangers by 615, the number determined to be needed by the V-RAP process and reported to Congress.

**Grade: Fail**

The NPS never increased the number of rangers. In instead put in a "no net loss" policy that it never rescinded, never enforced, and ignored. The number of rangers today is smaller than when this top safety priority was put into place. Please remember that at your next "operational leadership" safety symposium.

Inspector General Devaney told the NPS it needed 615 more rangers to provide for ranger safety, and the NPS failed to act to obtain them, and we've all been playing dangerously shorthanded because of it. Don't ever forget this, because despite all the slogans, this is exactly what the NPS thinks of your on the job safety.

**Recommendation:** Develop a data-driven plan to justify allocation and scheduling of new rangers.

**Grade: Fail**

No new rangers, no plan to allocate them and no plan to effectively allocate the existing rangers.

**Recommendation:** Increase productivity of current and future rangers through new technologies, joint efforts with other agencies, and other productivity enhancing initiatives.

**Grade: Fail**

Other than IMARS, assigned as a collateral duty, can you think of a national effort on new technology? National joint efforts with other agencies have primarily focused on taking rangers out of parks to support other missions, rather than infusing other agencies into the parks. Improvements continue to be made on drug enforcement efforts, but not as fast as the opposition innovates.

**Recommendation:** Establish ranger recruitment, selection, promotion, and performance evaluation policies and programs that conform to professional LE standards.

**Grade: Fail**

There is no national ranger recruitment program. The primary recruiter of rangers isn't the NPS, it remains in the hands of the seasonal academies. The NPS remains in violation of DOI policies that require that specialists conduct interviews prior to all LE hires. It remains in violation of DOI policies for psychological screening of LE hires. Disaster awaits.

**Recommendation:** Ensure that every ranger has or has access to a full

complement of essential LE equipment and technology.

**Grade: Pass**

Yes, the NPS did upgrade weapons 20 years ago thanks to the Lodge, but never made plans to replace them. Thanks to the Lodge, again, handguns are to be replaced. As of now there are no plans we are aware of to replace older rifles or shotguns, some of which have been in service since the 1960s. The NPS did take the lead on Tasers, thanks to individuals in the field and those in WASO not getting in the way, so that takes a poor record and raises it a bit.

**Recommendation:** Fill the Law Enforcement Division with specialists in law enforcement, information, technology, human resources, crime and service analysis, training, planning and research, written directives, and audits and inspections.

**Grade: Fail**

The Associate Director position is divided between several divisions. The Chief of LESES has a deputy for LE, a deputy for Emergency Services and a deputy for Investigative Services that has been lapsed for over a year.

The experts in law enforcement information don't exist. The experts in technology don't exist, the human resource staff doesn't exist. The analysts in investigative services don't analyze, there are no experts in planning and research, written directives are woefully lapsed, and audits and inspections don't occur according to policy. We'll give credit for implementing field training since the report was written, and expanding the FLETC staff to a level that is still inadequate.

**Recommendation:** Establish policies to ensure that chief rangers and all other law enforcement administrators at the regional and WASO offices are commissioned.

**Grade: Pass**

This was accomplished over a decade's worth of attrition, and not

active management. There may still be some of these people in place.

**Recommendation:** Refine and validate the Visitor - Management Resource Assessment Protection (V-RAP) model. This should entail validation of the existing staffing multipliers and expansion of the task array; work should be done by a panel or organization that meets criteria of independence.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish minimum standards for LE staffing in each park or unit, using validated V-RAP projections.

**Grade: Fail**

This didn't happen.

**Recommendation:** Mandate use of a V-RAP process for budgeting, resource allocation, and related law enforcement management functions – by each park unit.

**Grade: Fail**

This didn't happen.

**Recommendation:** V-RAP data and analysis should be maintained by the central office and updated annually.

**Grade: Fail**

This didn't happen.

**Recommendation:** Create tiered structures of law enforcement goals and objectives. Compatible, integrated structures must exist at the national level, in regions, and in every park. The structure must include objectives for the Department (DOI), NPS, and each park unit. Objectives must specify the outcomes that they wish to achieve. All objectives must be measurable. Personnel from all major units should be involved in the development process.

**Grade: Fail**

This didn't happen.

**Recommendation:** Ensure that objectives are set by groups that include all ranger ranks.

**Grade: Fail**

This didn't happen.

**Recommendation:** Ensure that the objectives are sanctioned by appropriate executives.

**Grade: Fail**

This didn't happen.

**Recommendation:** Ensure that objectives are documented and distributed to all personnel.

**Grade: Fail**

This didn't happen.

**Recommendation:** Develop one or more measures of achievement for each objective.

**Grade: Fail**

This didn't happen.

**Recommendation:** Ensure that objectives and measurements are used for planning, decision making, and performance evaluation at all levels of the NPS.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish a Field Training Officer Program.

**Grade: Pass**

The big problem, however, is that by failing to implement the other training reforms, rangers are going to field training after years – or even as long as a decade – into their NPS LE career.

**Recommendation:** The seasonal basic program should be restructured. Future rangers should be hired as permanent subject to furlough employees to the extent practical and undergo the same training requirements as permanents.

**Grade: Fail**

Not only fail, but the new plan seems to be having permanents training as seasonals.

**Recommendation:** Centralize responsibility for refresher training at the Park Service National Training Center at FLETC.

**Grade: Fail**

This didn't happen.

**Recommendation:** Audit refresher training to ensure that national standards are met.

**Grade: Fail**

This didn't happen.

**Recommendation:** Create a comprehensive and reliable training records database at a central location.

**Grade: Fail**

Some parks still fax or mail training records to FLETC where they are scanned, but no online database exists and nobody does audits.

**Recommendation:** Establish an Office of Technology at the WASO level to restructure NPS law enforcement communications and technology.

**Grade: Fail**

This didn't happen.

**Recommendation:** Prepare a master plan to restructure law enforcement communications.

**Grade: Fail**

This didn't happen.

When you see recommendations that say “master plan” “comprehensive” or “restructure,” chances are they didn't happen.

**Recommendation:** Consider developing regional dispatch centers in concert with the mandated narrow band digital deployment.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish comprehensive policy to regulate communications operations.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish policy to ensure that all protection rangers have access to emergency communications. These emergency communications should provide a “protection only” secure frequency or talk group for protection rangers.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish policy to ensure that all protection rangers have the ability to communicate directly with local law enforcement agencies, especially if they serve at any time as backup for protection rangers.

**Grade: Fail**

This didn't happen.

And again, there's no national audit to ensure this happened.

**Recommendation:** An agency-wide position description should be established for public safety dispatcher.

**Grade: Fail**

This didn't happen.

**Recommendation:** This emergency dispatcher classification should provide sufficient salary and benefits to attract and hold qualified personnel to this demanding and difficult job.

**Grade: Fail**

This didn't happen.

**Recommendation:** In addition, we recommend developing a Field Training Module for Dispatch Operations and develop benchmark competency levels and certification forms as provided by the Association of Public Safety Communications Officials, Inc.

**Grade: Fail**

This didn't happen.

**Recommendation:** As an interim strategy, improve communication service to rangers through memorandums of understanding (MOU) and contracts with local communications centers. Regional cooperative efforts with other federal agencies should also be sought.

**Grade: Fail**

This didn't happen.

**Recommendation:** Using the material forwarded by the IACP and reactions from the field, reexamine the newly issued directives for content gaps, internal inconsistencies, and non-compliance with professional law enforcement standards.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish a nationwide, centralized recruitment program.

**Grade: Fail**

This didn't happen.

**Recommendation:** Establish a nationwide, centralized eligibility register.

**Grade: Fail**

This didn't happen.

**Recommendation:** Restructure the law enforcement selection process in its entirety. Ensure that from job analysis to completion of basic training the program complies with professional LE standards.

**Grade: Fail**

This didn't happen.

**Recommendation:** Reinvigorate Ranger Careers.

**Grade: Fail**

This didn't happen.

**Recommendation:** Memorandums of Understanding. The variation in scope, formality (legality), functioning, effectiveness of MOUs with local and, to a lesser degree, federal law enforcement agencies would require months to catalog. These have developed throughout the park service for good reasons, but without, it appears in some cases without any consistently applied national or regional guiding principles. The entire practice requires study, planning, and oversight.

**Grade: Fail**

This didn't happen.

**Recommendation:** Background Investigations Standards. Recognition is universal, among rangers and superintendents, that inefficiencies in completing backgrounds and questionable medical requirements are seriously inhibiting an already aggravated staffing situation. Current policy calls for a background equal to that required for national security positions. This level of background is

not needed for protection ranger positions. Not only is this higher-level background more expensive, it takes considerably more time. NPS should adopt non-critical sensitive background determination for law enforcement rangers.

**Grade: Fail**

Fortunately this failed. Reading the requirements of the standard and the NPS position description clearly shows that the higher level of background is required.

**Recommendation:** Backgrounds for Supervisors of Law Enforcement Functions. All law enforcement administrators who have supervisory responsibilities over law enforcement programs or operations should have a complete and favorable background. This would include Parks, Regional Offices, and Washington personnel. The recommended level is non-critical sensitive.

**Grade: Fail**

This didn't happen.

**Recommendation:** Medical Standards. Confusing and questionable medical requirements also seem to be inhibiting the staffing process. It is recommended that a group of field rangers and human resource administrators work to rewrite DO/RM 57.

**Grade: Fail**

This didn't happen.

**Recommendation:** Detention and Holding Facilities. In many park areas detention activities require too much time and erode from time that could be devoted to prevention patrol or visitor contact. Some rangers spend four or more hours to transport and book prisoners. The isolation of park areas combined with the remote location means increased costs associated with law enforcement detention. Long distances result in excessive fuel costs.

**Grade: Fail**

This didn't happen.

**Recommendation:** We recommend that the NPS rehabilitate existing

holding facilities to bring them up to standard and construct new facilities where appropriate.

**Grade: Fail**

This didn't happen.

**Recommendation:** A Law Enforcement Uniform. LE rangers are not distinguishable from other rangers. The uniform and badge is the same. Park visitors cannot distinguish between law enforcement and non-law enforcement rangers. For a variety of reasons, including clarity for customers and greater safety for non-law enforcement rangers, a distinctive law enforcement ranger uniform, that is consistent with NPS traditions, is recommended. As a first step, we recommend that the shield with credentials be worn on the uniform. A committee should be established to look further into this issue.

**Grade: Fail**

Except for the actual badge change, this didn't happen.

**Recommendation:** Park Police Captains. USPP captains serve as law enforcement specialists at the regions and on the staff of the Chief, Ranger Activities Program. The arrangement does not seem to be causing tangible problems. We believe, also, that these captains possess strong law enforcement credentials and contribute sound advice to parks and their rangers. At the same time, the arrangement is anachronistic, dating back to the early seventies, unnecessarily confusing organizationally, and leaves authority gaps. It should benefit both agencies to return the captains to Park Police operations and replace them with ranger specialists.

**Grade: Fail**

This didn't happen.

It's quite interesting to note that the Regional Directors value their own stovepiped employees so much that they insist on keeping them, and making them acting Regional Chief Rangers. It's quite interesting how a detailed employee outside the ranger

chain of command is detailed in without any thought, but stovepiping rangers in parks is impossibly complicated.

**Recommendation:** Concession and Service Operations. The NPS reports that, at larger parks in particular, concession and service workers create law enforcement problems. For example, 38% of the arrests in Zion National Park, 35% of the arrests in Yosemite, and 61% of the arrests in Yellowstone National Park involve concession employees. Rangers attribute much of the problem to lax hiring standards. This situation requires review.

The NPS should as a matter of contract/permit language, require concessionaires conducting business in the park to require background disclosures from their applicants. They should also set minimum acceptable standards of past criminal behavior for specific employment activities in the park.

**Grade: Fail**

This didn't happen.

**Recommendation:** Improved Records Management. The NPS incident reporting system (CIRS) suffers a number of inadequacies. Its online features do not operate properly. Its report generator is difficult to utilize and does not provide the range of reports needed for management decision making.

Basic and important information on incidents, crimes and other emergency events is simply not available in any usable format. Information systems are critical management tools. Without quality and available information as to what is occurring, effective decision-making cannot occur. We recommend that a new and more comprehensive incident tracking system be secured. The Forest Service is reported to have an effective incident tracking system in place that NPS may want to review.

**Grade: Fail**

This didn't happen.

Although IMARS is in place, the information is not fully gathered, is not analyzed, and is not currently used for any meaningful purpose.

**Recommendation:** Specialized Teams. Need for additional and specialized rangers occurs regularly in the park service. Special needs include scheduled events, park emergencies, seasonal activities, including hunting patrols, patrol of illegal activities. Equipped and pre-trained teams drawn from the ranks of rangers could be mobilized to provide a trained team to address special events or problem areas.

**Grade: Pass**

**Recommendation:** Regional Equipment Cache. Regional equipment caches promise availability of periodically needed technology without the expense of each park purchasing individually. Caches could be shared with other Department of Interior agencies. Equipment could include video monitoring, intrusion detection, specially equipped vehicles, wires and other surveillance equipment as well as GPS and satellite location communication devices.

**Grade: Fail**

This didn't happen.

**Recommendation:** Prosecution of Federal Misdemeanor Offenses. Significant proportions of park units seem to have difficulty obtaining routine prosecutorial support for federal misdemeanors. Cases that do not reach the established prosecution thresholds are declined, it is reported, even though they are significant to the NPS mission. This is a critical problem shared by all federal land management agencies. NPS should join with other land management agencies and work with the Department of Justice, on a national level, to resolve this problem.

**Grade: Fail**

This didn't happen.

Major park law enforcement programs are crippled because of this failure to act.

**Recommendation:** Housing. Up-to-date law enforcement practices place greater emphasis on prevention and deterrence of criminal activity. One of the most effective practices to reduce crime and leverage resources is to have law enforcement personnel live within the communities and areas to which they are assigned to make their presence known – through community involvement and bringing marked police vehicles home. This practice is believed to reduce criminal activity and serve as a force multiplier.

We have already determined that inadequate staffing (i.e. backup) places ranger personnel at risk due to excessive travel time. This is particularly true in remote and large parks. To better protect visitors and resources, an increased number of housing units should be assigned to law enforcement rangers.

**Grade: Fail**

This didn't happen.

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## DOI Inspector General Recommendations

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**Recommendation 1:** For the purposes of providing increased coordination and advocacy for law enforcement at the Departmental level, the Department should create a new career Deputy Assistant Secretary for Law Enforcement and Security (DAS-LES) position, reporting directly to the Assistant Secretary – Policy, Management and Budget.

This position should be filled with an experienced LE professional.

**Grade: Pass**

It's amazing that many of the things that actually happened involved senior level managers getting better jobs.

**Recommendation 2:** To ensure a coordinated response in times of

emergency, the DAS-LES should have direct authority (when delegated by the Secretary) to oversee the operational deployment of all DOI law enforcement officers.

**Grade: Fail**

This didn't happen.

**Recommendation 3:** The Office of Law Enforcement and Security should be staffed with dedicated personnel experienced in LE investigations, management, criminal intelligence, legal matters and budget.

**Grade: Pass**

There are more GS-14s in DOI OLES than you can imagine since the OIG report. For the NPS, the office size has decreased during the same time. That's the difference between an office where reform is supported by management, and one where it's not.

**Recommendation 4:** The DAS-LES must establish a clearly defined and documented set of policies, procedures, techniques and mechanisms detailing the circumstances under which the Bureaus are required to interact with OLES and enforcement of those rules of engagement.

**Grade: Fail**

This didn't happen.

NPS foot dragging is legendary.

**Recommendation 5:** The DAS-LES should be granted oversight authority for all Departmental law enforcement units' budgets.

**Grade: Fail**

What, and mess with Superintendents? That would cause the end of the world. This didn't happen.

**Recommendation 6:** For all Bureaus, establish a Senior Executive Service (SES) level Director of Law Enforcement and fill it with an experienced law enforcement professional. This position should report directly to the Bureau Director or Deputy Director. Bureau Directors of Law Enforcement, together with the Director for the Office of Law Enforcement and Security, should serve as the members of the Law Enforcement and Security Board of

Advisors, created by the Secretary's Order of October 26, 2001.

**Grade: Pass**

**Recommendation 7:** Immediately restructure the reporting system for Special Agents (1811 and 1812 series) to create line law enforcement authority. All Special Agents in the field should report to Special Agent managers (Special Agents in Charge) who, in turn, should report directly to the Bureau Directors of Law Enforcement. Non-law enforcement oversight of investigations must be discontinued.

**Grade: Pass**

We're being generous here. Since the vast majority of investigations in the NPS are performed by rangers, there's a strong case to be made that that non-law enforcement oversight of investigations hasn't been discontinued at all.

**Recommendation 8:** For all remaining law enforcement officers and personnel, develop strategic plans for the transition to centralized management systems that report to the Bureau Directors of Law Enforcement. In the interim, ensure that any remaining non-law enforcement managers with line authority over law enforcement officers and personnel have and maintain Critical Sensitive Clearances, as recommended in current Departmental policy.

**Grade: Fail**

This didn't happen.

**Recommendation 9:** Establish and implement single line item budgets and cost tracking systems for all DOI law enforcement units.

**Grade: Fail**

This didn't happen.

**Recommendation 10:** ONDCP and other special law enforcement monies should be controlled by the DAS-LES and assigned a separate fund code for spending and tracking.

**Grade: Pass**

**Recommendation 11:** Each law enforcement program should develop

staffing models and methodologies. The Office of Law Enforcement and Security should oversee this development effort.

**Grade: Fail**

This didn't happen.

**Recommendation 12:** Staffing shortages related to officer safety should be identified by the OLES and corrected immediately.

**Grade: Fail**

This didn't happen.

**Recommendation 13:** Reduce dependence on part-time collateral duty and seasonal law enforcement officers.

**Grade: Fail**

This didn't happen.

In fact, the NPS is more dependent on seasonals than ever.

**Recommendation 14:** All DOI security policy oversight and compliance should be the responsibility of OLES.

**Grade: Fail**

This didn't happen.

**Recommendation 15:** MIB security should remain the responsibility of the National Business Center (NBC), however, the NBC should appoint a dedicated Security Management professional with proper credentials to manage security at MIB.

**Grade: Pass**

**Recommendation 16:** Each Bureau should appoint a senior-level (GS-14/15), full-time security manager to maintain the daily security operations of the Bureau.

**Grade: Fail**

The NPS has a security position, but without national operational authority. That's why you haven't heard of him.

**Recommendation 17:** Responsibility for Emergency Preparedness should remain in the Office of Managing Risk and Public Safety. MRPS

should, however, appoint a GS-15 Emergency Preparedness Manager and provide that appointee with adequate staff to fulfill these responsibilities.

**Grade: Pass**

Lots of GS-15s at DOI, no?

**Recommendation 18:** A single, Departmental Internal Affairs Unit should be established in OLES, to provide independent, objective oversight over all Departmental law enforcement officers and managers.

**Grade: Fail**

This didn't happen.

**Recommendation 19:** OLES and the Law Enforcement and Security Board of Advisors should review, revise and strengthen the Departmental Manual provisions addressing internal law enforcement incident reporting and resulting investigations.

**Grade: Fail**

This didn't happen.

**Recommendation 20:** The OLES and Board of Advisors should develop recruiting standards and guidelines for recruiting new DOI agents and officers, with an emphasis on building upon existing strategies and developing new innovative strategies to improve DOI's diversity in law enforcement. The Director of Law Enforcement for each Bureau should have authority to review and approve all law enforcement applicants prior to hiring.

**Grade: Fail**

This didn't happen.

**Recommendation 21:** The OLES and Board of Advisors should research the background investigation process and determine what can be done to decrease the time it takes to hire applicants.

**Grade: Fail**

This didn't happen.

**Recommendation 22:** OLES should develop training standards and training modules for all DOI law enforcement -- 1811s, 1812s and uniformed officers.

**Grade: Fail**

This didn't happen.

**Recommendation 23:** OLES should coordinate the development and implementation of a department-wide central records system. The OLES and the Law Enforcement and Security Board of Advisors should mandate what law enforcement information must be maintained and how it must be reported.

**Grade: Pass**

**Recommendation 24:** OLES should lead the development of performance goals and measures for DOI law enforcement programs, and should coordinate the reporting process for law enforcement programs Department-wide.

**Grade: Fail**

This didn't happen.

**Recommendation 25:** OLES should coordinate the revision and streamlining of an Interagency Agreement among all DOI law enforcement entities to ensure, at the very least, cross-designation among DOI law enforcement programs.

**Grade: Fail**

This didn't happen.

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## Membership Notes

Paige Meier

Membership Services Coordinator

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Many thanks to all of our members who have stayed in touch with us this year. Your active participation by getting your dues in on time, letting us know when your address changes, and responding to our emails makes our job easier. We always like to hear from you!

To find extra articles, expanded content and how to order merchandise found in your FOP Journal, go to [www.fopconnect.com](http://www.fopconnect.com)!

Thanks, too, to all of you who renewed at the voluntary additional \$10 rate last year. Your generosity has helped keep the Lodge afloat without having to raise dues. You have been a great help to your fellow members in need and in day to day operations of the Lodge. Your generosity helps us help you.

Also, a significant number of you made even more generous donations. We are extremely grateful. Those extra donations have ensured we won't have to raise dues and can put the money directly to helping members in need.

The 2014 membership cards were sent out to all Active and Associate members by January 10th. We got them late but they're on the way! If you've recently received a renewal notice, please send in your dues soon, to ensure that you receive your new card. If you haven't received your card by the 25<sup>th</sup> or so, check back with us to see the status of your membership.

I want to remind everyone that if they have FOP license plates or Hylant insurance, it is imperative that you keep your membership up to date. Because when it comes time to renew, they DO check to verify that your dues have been paid. If you receive a final notice to pay your dues, please don't wait until the last minute and risk having your membership suspended. Because once it's been suspended it takes a minimum of three weeks to be reinstated. And during that time you will not be able to renew either your Hylant insurance or your FOP plates.

#### **Web site registration and privacy issues**

If you haven't already done so, you might want to sign up as a registered user on the Lodge web site. There, you can take part in discussions with other rangers on our Member Forums. If you register using an email address other than the one you provided when you joined or renewed

your membership, please let us know, as we do not approve a registration unless we can verify the registrant's membership status. Also, be sure and add your real name on your profile page.

This year several members have brought up several critical issues concerning privacy on the Lodge Forum. If you have concerns

regarding your privacy when you post, please go to the Website Updates & Information section of the Members Forum and read **IMPORTANT!**: Privacy Settings. This will tell you how to edit your forum options to insure privacy.

Happy New Year and have a safe 2014.

### **History of the Hudson law: Why seasonals are limited to 1039 hours**

Congress passed and the President signed this bill into law because Mr. Hudson was an eight year veteran maintenance worker in the District of Columbia who suffered a heart attack and died while at work. It was determined that the poor man's estate could not provide for his widow and children and was barely able to cover his burial expenses. Congress asked how a man who worked for eight years would be in such a financial state and the NPS officials who testified said the Mr. Hudson was only a seasonal and received no benefits although he worked the better part of the year. The law specified that any employee who worked more than six months had to be Subject to Furlough.

In response, and typical of the bad faith shown over the years by top NPS management, field staff were ordered to cut all "seasonal" (they are really temporary under civil service law - another abuse) rangers and maintenance workers to 1039 hours per year, one hour less than six months. So the Director was OK with letting the parks suffer staffing shortages - 180 days had been the cutoff - in order to avoid the spirit of the new law. It was only a year or two later that the NPS developed ways around the 1039 limit but there was no move to provide temporary workers with benefits.

The NPS along with the IRS was used as example by the old Office of Personnel Management as an agency that had a need for full time workers but for less than 12 months: At training we were told, these people are not temporary, it's a misuse of the temporary provisions within the rules and regulations, but must be Subject to Furlough.

One WASO human resources manager was even opposed to length of service recognition for seasonals because it drew attention to the NPS's abuse of the Hudson law. So not only are seasonals being cheated, the NPS should cheat them of recognition as well, lest to draw attention to itself. You can't make stuff like this up.

In the media, we've seen criticism of companies hiring part-time workers to avoid paying benefits.

Wal-Mart, McDonalds and the like have nothing on the NPS, who have been violating the intent of the law and balancing its budget on the lowest ranks of the pay grade for decades.

**Lodge Website**

The Lodge website is updated with notices and links to other sites that we think are interesting and/or helpful to resource based law enforcement officers. Visit it often between issues of *The Protection Ranger* to keep current on things that affect you and your job. Our address is [www.rangerfop.com](http://www.rangerfop.com).

**Application for Membership**

You may also join, renew and pay your dues online with PayPal. [rangerfop.com](http://rangerfop.com) and choose **Join the Lodge**.

I, the undersigned, a full-time regularly employed law enforcement officer, do hereby make application for active membership in the U.S. Park Rangers Lodge, FOP. If my membership should be revoked or discontinued for any cause other than retirement while in good standing, I do hereby agree to return to the Lodge my membership card and other material bearing the FOP emblem.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_

State: \_\_\_\_\_ Zip: \_\_\_\_\_ Phone: \_\_\_\_\_

DOB: \_\_\_\_\_ E-Mail: \_\_\_\_\_

Permanent Rangers: \$60/year

Seasonals and Retired Active Members: \$40/year

Associate (non-Commissioned) Membership (Newsletter only): \$40/year

Renewals: You do not need to send in this form to renew. Enclose a copy of your Commission (new members only).

Make Check Payable to: National Park Rangers Lodge

Agency and Work Unit: \_\_\_\_\_

Mail to: National Park Rangers Lodge, POB 1481, Twain Harte, CA 95383

Phone: 1-800-407-8295 9am-8pm Eastern Time or email:

[rangerfop@sonic.net](mailto:rangerfop@sonic.net)

A member suggested we look into signing up for pro deals through *ProMotive.com*. This site consolidates pro deals from hundreds of equipment companies such as 5.11 Tactical, DeLorme, Marmot, Crimson Trace laser products and over 200 other law enforcement and outdoor equipment manufacturers. Discounts of up to 70% are available and new brands are added often.

To sign up for the Ranger Lodge's ProMotive Team site, create an account at: [www.promotive.com/fraternalorderofpolicerangerlodge](http://www.promotive.com/fraternalorderofpolicerangerlodge)

On the left, click on **Have A Code?** Then paste in: B664-948F-ADEA-C4D5. Fill in your email address and other information as you click through the screens. The Lodge will approve your membership so it'll take a few days for your account to become active. Write us at [rangerfop@sonic.net](mailto:rangerfop@sonic.net) if you're not approved fairly quickly. Please use the same email you use for your Lodge contact. We will **ONLY** approve current members in good standing.



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