



Office of the Director

United States Department of the Interior

NATIONAL PARK SERVICE

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Washington, D.C. 20240

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Memorandum

To: Regional Directors
Associate Director, Park Operations & Education
Associate Director, Administration

From: Director

Subject: Comprehensive Law Enforcement Review and IACP Report

Attachment Enclosed for review is the final report prepared by the International Association of Chiefs of Police. This report is the culmination of a study process that began in January of 2000. The review consisted of employee surveys, on site evaluations, employee interviews, and a review of past documents and data.

As you are aware, I commissioned this comprehensive law enforcement review by a professional third party, the International Association of Chiefs of Police (IACP), in January of 2000. The review resulted from my concern for the safety of our park rangers and indications that our ranger law enforcement program was not supported at a level that would fully protect our rangers, visiting public and park resources. The IACP effort consisted of site visits to 35 units of the National Park System, a comprehensive employee survey, individual employee interviews, and a review of NPS policies, plans, and documents. I am very impressed by the thorough and professional efforts of the IACP team led by Jerry Needles, and by Mike Finley the NPS review coordinator. The report being released is solely the product of the IACP. I asked for an independent and professional review of our ranger law enforcement program. I am pleased to say that this goal was achieved. The IACP final report, Policing the National Parks: 21st Century Requirements, identifies both the strengths and weaknesses of our current ranger law enforcement program. It confirms many of the findings of other in-house evaluations and validates the Law Enforcement Study Report submitted pursuant to the National Park System Omnibus Act of 1998. All of these point to a critical need to provide better support & protection to our rangers as they work to protect park resources and visitors.

I place a very high priority on addressing the issues identified in the IACP Report in a timely and focused manner. In that regard, I ask each of you to review the data and come

prepared to begin discussing the report and an appropriate implementing strategy at the NLC meeting scheduled for November 30th – December 1st.

I also ask that each Regional Director plan to engage in wide ranging discussions within their region to evaluate the report and to provide recommendations to me regarding its findings and appropriate follow-up actions. To assist with the distribution of the report, I have asked Associate Director Dick Ring to have it posted on the NPS website.

Additionally, I am asking Associate Director Masica to develop funding strategies that can support action on key recommendations in the report.

I view park rangers and the law enforcement duties they perform as integral to achieving the core mission of the National Park Service. I value both the commitment and the judgment of these park rangers and am prepared to begin addressing the issues in the report in an expedited and focused manner. I look forward to an initial discussion on the report with you at the NLC meeting.

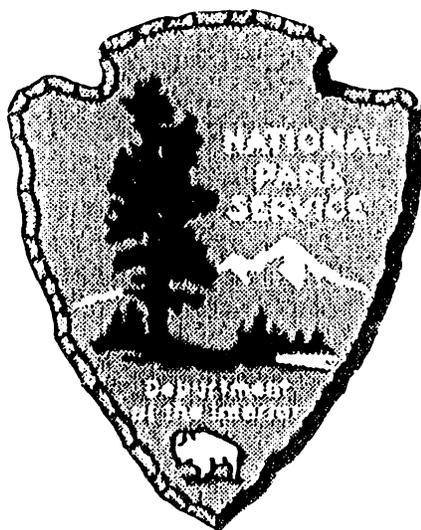
Thank you for your continual support and cooperation.

Attachment

cc: Deputy Director, Galvin
Associate Director, Park Operations and Education

POLICING THE NATIONAL PARKS

21ST CENTURY REQUIREMENTS



Prepared By

THE INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE

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October 2000

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INTRODUCTION

Beginning early in 2000, and continuing through the summer, the IACP examined the law enforcement program of the National Park Service. The study focused on the responsibilities, capacities, and requirements of the protection rangers who police almost 400 national parks, historic sites, seashores, memorials and monuments that compose the network for which the NPS bears stewardship. The functioning of other Department of Interior law enforcement programs was not a subject of this study.

SCOPE OF WORK

The study targeted five clusters of consideration:

- ❑ **Law Enforcement Readiness.** Law enforcement/protection effectiveness and factors that facilitate or inhibit law enforcement performance.
- ❑ **Ranger Safety.** Communications and dispatch policies and practices; equipment; safety training; “fitness” for high risk and law enforcement activity.
- ❑ **Staffing.** Evaluation of V-RAP (Visitor Management Resource Protection Assessment Program), the NPS law enforcement staffing requirements methodology. Relationship of current staffing levels to ranger safety and mission effectiveness.
- ❑ **Policy and Written Directives.** Adequacy of recently restructured policies and procedures to guide the law enforcement mission.
- ❑ **Career Development.** Career entrance and progression, including recruitment practices, selection, and professional development (training).

Two factors inspired the NPS call for a study:

- ❑ The 1999 slaying of a ranger at a national park in Hawaii, the third line-of-duty death during the 90s
- ❑ Mounting workforce dissatisfaction with the “law enforcement condition”

The scope of work was distilled from exhaustive discussions with ranger and park superintendent focus groups.

STUDY APPROACH

Work was conducted in four phases. Phase 1, Project Organization and Design, consisted of focus group work; project scoping; design of an organizational culture/workforce survey questionnaire; design of field interview guidelines; and assembly of DOI and NPS background materials. The project team met with/interviewed approximately 150 rangers and park superintendents during the design phase, primarily in group settings.

Phase 2 focused on field work/site visits. Visits ranging from one-half day to one and one-half days were made to 35 parks, ranging in size from John Muir Historic Site to Glen Canyon National Recreation Area and from Ft. McHenry to Everglades National Park. Supervisory and non-supervisory employees were engaged, separately, in a variety of discussions, including ones which focused on strengths and weaknesses of the NPS law enforcement program and recommendations for improvement. A total of 319 employees were interviewed during this phase.

Phase 3 was devoted to data synthesis; data evaluation; further research to fill data and information gaps; and preparation of a draft report. The draft report was reviewed with NPS officials and members of the workforce for judgement of factual accuracy of content and general reaction. A number of corrections, suggestions, and supplemental ideas were incorporated in preparation of this final report, Phase 4 of the project.

STUDY TEAM

The study was conducted by Jerome A. Needle, Director of Programs and Research, IACP; Dr. Michael Breen, Manager, Juvenile Justice Training and Technical Assistance, IACP; Dr. Robert Ford, University of Central Florida and former Chief of Police, Port Orange, Florida; Jeanine Burchard, Assistant to the Director of Programs and Research, IACP; and Kim Kohlhepp, Manager of IACP's Center for Testing, who assisted with data preparation and analysis. Palmer J. Wilson and David Bodie, Associate Consultants, and IACP Fellow, Lieutenant Andrew Ellis, Prince Georges County, Maryland, Police Department, synthesized and analyzed workforce survey data. Patrick Oliver, Associate Consultant, Chief of the Grandview, Ohio, Police Department, examined NPS policies and procedures.

DOI AND NPS SUPPORT

The DOI and NPS supplied substantial guidance and support, without which the project could not have achieved effectiveness. The following individuals are singled out for leadership roles and special contributions:

- Michael V. Finley, Superintendent, Yellowstone National Park – NPS Project Leader

- ❑ D. Paul Henry, Superintendent, NPS – Federal Law Enforcement Training Center
- ❑ Aniceto Olais, Chief Ranger, Zion National Park
- ❑ Cindy Ott-Jones, Chief Ranger, Glen Canyon National Recreational Area
- ❑ Stephen Knode, Project Leader, U.S. Fish and Wildlife Service
- ❑ Gary White, Special Agent, Bureau of Land Management, National Law Enforcement Office

We also acknowledge the Director of the Park Service, Robert Stanton, for his support for this study.

SPECIAL ACKNOWLEDGMENT

Over 1,000 protection rangers and park superintendents invested considerable time to prepare and submit reasoned and thoughtful responses to workforce surveys. Many NPS members spent time discussing issues with and proposing innovations to project staff, forwarding information, e-mailing, telephoning, and otherwise helping to build the rich information base in which this presentation is anchored. We wish to acknowledge and thank all of these individuals.

EXECUTIVE SUMMARY

A number of assets characterize the law enforcement function of the National Park Service, none more valuable than the quality of the ranger staff and their commitment to the NPS mission. The assets are more than offset by a range of conditions and practices that inhibit the current effectiveness and future potential of the law enforcement function. A vibrant and powerful law enforcement capacity is central to achieving of the core mission of the NPS. This capacity does not exist today. Rather, we find a law enforcement function that is undervalued, under-resourced, and under-managed by the NPS.

It does not appear that, to date, either the NPS or the public it serves have paid a severe price for this condition. In view of current trends, however, continued neglect is not advisable. Law enforcement capacity to contribute to the core mission of the NPS – to protect natural resources, visitors, workers, and rangers themselves – is eroding. This condition must be reversed immediately. Simultaneously, the NPS must reposition law enforcement to meet 21st century challenges. To do otherwise is a risk that should not be considered.

THE POLICING ENVIRONMENT

The capacity of the NPS to meet its protection obligations is conditioned by a complex mix of factors and trends. Among the most consequential are the number and size of properties/units to be protected; incidence of crime and disorder; law enforcement resources – financial, human, equipment, and technological; education, training, and experience of law enforcement staff. All have important implications for policing the national parks – today and in the future – and for judging the capacity of the law enforcement function to contribute to the core mission of the NPS.

- **Park System.** The current number of units under the care and management of the NPS is 373, over 90 million acres. The sheer number of units, extreme variations in size (acreage) and visitation, their geographical dispersion, and long distances between them complicate and challenge law enforcement management. This configuration of factors limits potential for standardization; resource leveraging; convenient interpersonal communications; and management control. The factors add complexity to system-wide law enforcement planning, evaluation, and human resource policies and practices.
- **Visitation.** The service population of the NPS – 436,000,000 visits in 1999, an average of over 1,000,000 per day – rivals that of America's largest urban cities and centers, and it is growing. Visitation has been increasing at an annual average of 3.1% since 1995. At this rate, 13 million additional visits may have to be serviced by NPS units each year for

the next several years. The visitation trend alone argues for resource/staffing augmentation.

- **Serious Crime.** Parks are very safe places for visitors. Less than one visit in every 100,000 results in victimization, and the victimization is less likely to result from a violent than a non-violent act. Both violent crime and property crime declined in 1999, a second successive annual decline. Reported levels and trends in crime in the parks do not argue for movement beyond normal staffing augmentations or augmentations suggested by other trends and factors.
- **Less Serious Crime.** Less serious crime is more prevalent than serious, but still marginal in rate of occurrence. Nine (9) less serious crimes were recorded in 1999 for each 100,000 visits. After a substantial drop in less serious crime from 1995 to 1996, less serious crime has been trending upward since 1996 and now has returned to the 1995 level.

Paralleling the reasonable overall rate of less serious crime are several dimensions that require more detailed evaluation and continuing monitoring by the NPS. Resource violations have increased substantially, 35% since 1995. The increase could be due to greater citizen disregard for the parks, more aggressive/proactive ranger activity, or both. Data on less serious crime document fall-offs in recorded drug abuse offenses, DWIs, weapons violations, and disorderly conduct incidents. When visitation increases are taken into account, experience and anecdotal evidence suggests a fall-off in the proactive order-maintenance capacity of rangers. This calls for intensified field activity by an augmented staff of law enforcement rangers and/or other interventions.

- **Other Offenses.** “Other offenses” are increasing by 3.5% annually. Absence of detailed data precludes examination of types of offenses included in this broad class and emphasis among the types. Issuing “other offense” data in aggregate form conceals identification of specific problems that may exist and development of targeted responses. This is a crime and service database shortcoming that requires correction.

Other offenses include permit violations, such as entering closed areas, and fishing, hunting, fire, or camping violations. They also involve environmental violations such as plant removal. Other offenses are of particular interest since they encapsulate offenses unique to park settings.

- **Clearances.** Nationally, about one of five serious crimes is cleared. Violent crimes are cleared at a higher rate. The NPS clears crimes at a lower rate than law enforcement agencies nationally. This is attributable, in large measure, to the transience of the service population and a limited corps and geographical dispersion of investigative specialists – the special

agents. Simply put, the NPS is not positioned to perform as well in this area as many law enforcement agencies. Still, a detailed review of follow-up investigations practices, with a focus on improvement, is well advised. Like residents of communities across the U.S., park visitors expect law enforcement agencies to close cases, bring offenders to justice, and return property.

- **Resources – Expenditures.** Expenditures for protection have increased 139% since 1994. Since 1995, they have increased by \$29,800,000, 25.2%, an annual average of 6.3%. The major infusion of resources occurred in 1995, an increase of \$56,000,000.

During the same period, expenditures for law enforcement have increased almost \$34 million, 55.6%, an annual average of 11.1%. The trend has been uneven, with two small declines, during the six-year period, and sizeable increases in 1995, 1996, and 1999.

Despite generous increases, we believe the law enforcement function remains under funded. A backlog of staffing and non-staffing needs is present, and re-positioning for the future is required. The NPS reports, for example, that 15 parks in the Midwest Region and 12 parks in the Southeast Region have no law enforcement rangers. It reports that 15 additional parks in the Midwest Region have only one law enforcement ranger. This results in no backup for the rangers and no coverage for the parks two days a week.

Documenting how the additional millions appropriated have been invested and demonstrating results achieved is an obligation of NPS management and important to credibility as the agency seeks new resources.

- **Resources – Staffing.** The increase in expenditures between 1994 and 1999, 56%, has been paralleled by a 2.5% overall increase in staffing, but an 8.7% decrease in rangers, 149 positions. Clearly, increased appropriations and expenditures have not produced additional permanent positions. The number of seasonals has fluctuated, ranging between 550 and 675, but without the relationship expected – increased authorization and use of seasonals during years when the number of permanents were reduced/unavailable.

Considering increases in the number of units to be policed, 14 during the past six-year period, and increased visitation, 56,000,000, the NPS pattern of law enforcement staffing is not suggestive of needs-driven allocation decisions and is patently illogical and erratic. The NPS would do well to employ a staffing model that provides sound and consistent results. The proper utilization of V-RAP indicators may meet this objective. A segregated law enforcement budget would be a useful corollary.

- **Staff Profile.** Law enforcement staffs composed of sizable concentrations of young and older members present operations and management challenges. Young (modestly experienced) officers require closer supervision and more training than experienced officers and are prone to more mistakes. Concentrations of older officers, particularly in supervisory and command ranks, present the prospect of loss of institutional expertise and require attention to replacement and leadership grooming. Neither of these conditions is present in the NPS setting. Both age and experience profiles indicate presence of seasoned ranger personnel, well distributed along age/experience continuums.

- **Line-of-Duty Deaths and Assaults.** Park Service rangers experience the highest officers-assaulted rate among federal law enforcement agencies. This fact, coupled with the slayings of NPS officers in 1998 and 1999, have nurtured a pervasive sense of workplace threat. NPS law enforcement rangers have crossed a threshold of concern for their own safety and protection – properly so. Today’s ranger expects more backup for serious calls and events, better communications equipment, better defensive tactics training, and more effective recruitment and selection of future rangers. They deserve nothing less.

Examination of the NPS policing environment reveals a burgeoning law enforcement service population and expanding territorial responsibilities. It reveals static law enforcement production, indeed, decline in certain areas that require proactive enforcement, and eroding staff capacity, especially the number of permanent rangers. These trends, coupled with compelling and reinforcing findings from field work, justify the conclusion that the NPS law enforcement capacity is not currently sufficient to maximize contribution to the agency’s core mission nor is park law enforcement positioned to meet 21st century protection challenges.

THE LAW ENFORCEMENT INFRASTRUCTURE

The capacity of the NPS to meet its protection obligation is dependent on the level and quality of the fiscal and human resources it chooses to commit and how resources are organized, managed, and controlled.

- **Organization.** The organizational model employed to manage law enforcement has not been brought to full potential. The law enforcement function is not getting the leadership required to meet current and future demands. It lacks a sufficiently powerful champion and, at the national level the organizational/structural position to exercise the voice it deserves. Two options seem most worthy of consideration at this time:

- Retain the current organization and manage it more effectively.
- Reject the current organization in favor of a more traditional stovepipe form.

Cogent arguments can be made for each option. For a range of reasons, including the current inventory of unmet law enforcement needs and the values of conforming to the NPS governing decentralization model, radical modification of the current law enforcement structure is not recommended. The law enforcement function would not be served best by a dislocating organizational restructuring. NPS emphasis should be focused on accomplishing the priority recommendations in this report and in other documents, most notably the Law Enforcement Program Study submitted pursuant to the National Parks System Omnibus Management Act of 1998.

- **Staffing.** For reasons of unacceptable risk to rangers, erosion of proactive law enforcement capacity to safeguard natural resources, visitor and land acquisition trends that only promise to aggravate the foregoing conditions, and the validity of NPS views on risks of not increasing ranger staffing, we recommend an aggressive program of staff augmentation and resource leveraging initiatives. A goal of 615 new law enforcement rangers is reasonable, an increase of 28%.

Addition of 615 rangers, properly distributed and managed, should have a profoundly positive impact on NPS law enforcement capacity. This number, roughly equivalent to the current seasonal complement, should enable the NPS to minimize seasonal employment. Seasonal law enforcement rangers, while economically beneficial, are a very mixed blessing, with many downsides from professional and corporate management standpoints, including training, experience, and turnover. Seasonals work an average of four months per year. Replacement with an equivalent number of full-time rangers would almost triple the capacity now supplied by seasonals. The need for some level of supplementary manpower from seasonals will always be present. In this regard, we endorse an NPS desire to reclassify seasonal law enforcement positions to “permanent – subject to furlough.”

Should recommended or other staffing augmentations eventuate, the NPS is obligated to allocate new rangers to conform to the dictates of a defensible deployment scheme. The V-RAP methodology should be of great assistance in formulating a strategy. Decisions must be made concerning configuration of the 615 positions – rangers, supervisors, and specialists.

- **Resource Leveraging.** Service demands that exceed capacity can be met in several ways: increases in staff; introduction and enhanced use of productivity strategies; a combination of the foregoing. Reliance on staffing increases alone is rarely defensible.

Productivity strategies minimize staffing augmentation requirements and enhance the quantity or quality of service delivered by staff that is in place. We found little attention being paid to law enforcement productivity strategies within the NPS, except for equipment considerations. Productivity opportunities that may be available to NPS units center on workload reduction; technology; contracting; cross training; crime prevention; problem solving; training; morale and motivation; clearly defined ranger objectives.

- **Goals and Objectives.** Law enforcement objectives must define the ultimate outcomes that rangers strive to achieve. They are the prerequisite to managing by objectives. Law enforcement objectives should exist for the NPS, for each park, and for rangers. Logical and reinforcing relationships (“tiers,” in the NPS strategic plan structure) must exist among levels of objectives. Objectives must be defined with sufficient precision to yield valid measurement. Without valid measurements, it is difficult to assess the performance of a law enforcement agency insightfully or to conduct many aspects of the management process rationally and successfully.

The NPS falls well short of meeting the foregoing requirements. Evidence is ample that the NPS has command of the principles and mechanics of objectives setting and measurement. The most recent Strategic Plan is outstanding in construction. It evidences careful thought and craftsmanship. Disappointingly, however, neither this document nor most others we have read presents law enforcement objectives. We find this compelling in drawing impressions about the secondary status of law enforcement. Further, two of every three park superintendents have not chosen, or perhaps have not had time or resources, to fashion law enforcement objectives.

- **Training.** The NPS training function has several strengths. Assets include a strong basic program and a solid in-service program. The most glaring deficiency is total absence of field training. Refresher training practices fall short of professional requirements. We are not convinced that seasonals receive sufficient preparation.
- **Emergency Communications.** Communications practices of the NPS meet only the most minimum professional expectations. Shortfalls are easy to catalog. Rangers are often out of contact because of dead-spot situations. Rangers compete for airtime on shared frequencies. Shared

frequencies risk security of communications. Equipment is not what it should be. The willingness of local law enforcement agencies to support park law enforcement operations gives an enormous but often not sustainable predictable boost to the NPS communications capacity.

The current situation, which is commonly acknowledged throughout the Park Service, is explained easily. It is rooted in a decentralization effort that has left much undone and in fragmented authority and responsibility. No one officer, or office, seems to be in charge of communications. Not enough seems to be occurring to remedy the current situation. Attention has to be devoted to needs assessment, an emergency communications master improvement plan, access considerations, criminal justice databases, uniform position descriptions and standards for dispatchers, and emergency dispatch structural arrangements. Movement toward regional dispatch centers is a promising innovation that can drive a change agenda.

- **Policies and Procedures.** Wholesale revision of policies and procedures was undertaken in the mid-90s and completed this past spring. This multi-year project involved numerous NPS personnel. The product underwent frequent revision while in draft stages. Final approval was granted by the Solicitor's Office, with the blessing of the DOI Office of Managing Risk and Public Safety.

Policy and procedure work must be ongoing in every law enforcement agency. Accordingly, the work done to date by the NPS should be viewed as an initial building block and not the conclusion to a six-year effort. The body of policy and procedure still requires substantial strengthening – in organization, format/construction, and coverage/content. Monitoring and compliance need strengthening. Inconsistencies still exist among the written directives.

THE STATE OF PARK LAW ENFORCEMENT – WORKFORCE PERSPECTIVES

A series of law enforcement focus group discussions yielded broad and penetrating insights into NPS values and culture, and the concerns and change preferences of rangers, ranger managers, and park superintendents. The discussions produced information on the nature and effectiveness of ranger operations. This foundation of focus group information and findings was expanded and enriched through a service-wide workforce survey.

- **Survey Objectives.** Surveys were designed to elicit opinions about safety; objectives; job preparation and direction; career conditions; management obligations; innovations.

- **Responses.** Two populations were surveyed, rangers and park superintendents. Participation was voluntary. Responses were anonymous. The Ranger Survey was distributed to every commissioned ranger, special agent, district ranger, chief ranger, and staff park ranger, a total of 1,528. Responses were received from 942 rangers, 62%. The Park Superintendents Survey was distributed to every superintendent in the system. Responses totaled 160, 43%. Total response was 1,102.

- **Findings.** Rangers returned favorable ratings on only four of 18 practices and conditions examined, 22%. By contrast, park superintendents responded favorably on nine of 13, 69%. Inter-class comparison reveals significant variation among classes of rangers. Favorable ratings correlate positively with rank/position – higher ranks and positions regard practices and conditions more favorably.

Understanding of NPS objectives is the one condition rated highly by both rangers and park superintendents. Rangers are also positive about basic training and their capacity to protect their own safety. Superintendents are also positive about implementation of the Ranger Careers program; the equipment and technology supplied to rangers; their own level of accountability; ranger training; capacity of rangers to protect themselves; capacity of rangers to protect visitors; direction and guidance on law enforcement matters which they receive from their supervisors.

Perceived assets are offset by a lengthier series of perceived shortfalls that cluster in three areas: insufficient law enforcement capacity to achieve the core mission of the NPS (safety); law enforcement infrastructure/support shortfalls (job preparation and direction); human resources management (career conditions).

Rangers regard the following NPS law enforcement practices and conditions to be unsatisfactory: capacity to safeguard natural resources; capacity to safeguard visitors; park law enforcement objectives; in-service and advanced training; policies and procedures; supervision; equipment and technology; communications systems; recruitment; selection; promotion; discipline; performance evaluation.

Rangers also feel that park superintendents are not held sufficiently accountable for law enforcement conditions and practices, and as a corollary matter, pay insufficient attention to program evaluation.

Park superintendents concur with ranger judgements of shortfalls in only a limited number of areas: park law enforcement objectives; communications systems; program evaluation.

The values, perspectives, and interests of female rangers are currently a priority interest of the NPS. Survey responses of female rangers did not differ in any statistically significant way from those of male rangers, on any item in the survey.

THE NPS LAW ENFORCEMENT CULTURE – PROSPECT FOR CHANGE

The following attributes appear to characterize the NPS culture. They should receive due regard as the NPS pursues a change agenda. Several bode well for successful change. Most present challenges for organizational transformation. A number of these attributes are correlates of currently existing law enforcement operations and management shortfalls.

- ❑ **The Prime Asset.** The current ranger force is well educated, deep in experience, joined the NPS because of a belief in its mission, and is committed to a career in land/resource protection.
- ❑ **Demand for Change.** A demand for change from rangers is palpable. Morale is still positive, generally. The ranger force is pursuing changes in the most professional manner and should continue to do so. It seeks collaborative and constructive dialog, and responsiveness.
- ❑ **An Unfinished Design.** We are not able to assert that the NPS has ever had a finished design for a full-scope, professional law enforcement function. There is clear evidence of measurable improvement during recent decades. Progress seems to have occurred randomly, in a slow and reactive manner, and not from comprehensive design and engineering. Emerging conditions advise that the NPS reverse tradition in this regard.
- ❑ **A Profusion of Systems and Standards.** Not surprising in view of the “design” condition, the number of variations in law enforcement approaches, staffing configurations, management and supervisory styles, compliance requirements, equipment standards, and many other critical aspects of the protection function defy cataloguing. NPS law enforcement can justly be described as a profusion of conditions and practices in search of a system.
- ❑ **Marginalized Status.** From the ground up, the law enforcement voice appears to be less audible than it should be within the parks and at the DOI/WASO headquarters level. Second only to perceived staffing shortfalls, rangers wish to emerge, in their own view, from second-class status. Absence of law enforcement goals and objectives in the just released 2000-2005 NPS Strategic Plan and infrequent reference in other “vision” documents seem to substantiate ranger self-perceptions.

- ❑ **Law Enforcement and the Core Mission.** Related to the marginalization issue is a belief among rangers that park superintendents and NPS executive staff at WASO fail to appreciate the connection between law enforcement and the core mission of the NPS.
- ❑ **Decentralization and Downsizing.** Decentralization and downsizing seem to have destabilized a number of management and oversight responsibilities that remain to be reconstituted. Several examples can be found. Operation and Policy audits have vanished. Today, NPS is unable to provide on a readily available and service wide basis, information on size and location of staff and training and personnel histories.
- ❑ **Role Tension.** The generalist-specialist debate, along with the corollary issue, collateral duty, is a destabilizing influence. The NPS needs to deliver an assertive message to quiet this debate.
- ❑ **NPS Resource Shortages.** NPS has finite resources, insufficient in total to accommodate the many law enforcement and non-law enforcement needs. This requires that change agents concentrate on priorities and recognize that many important needs just cannot be funded. Rangers must also accept this reality.
- ❑ **Poverty of Data.** The NPS is poorly positioned to examine and evaluate law enforcement successes, inadequacies, and emerging trends of significance. Central authority no longer seems to exist to mandate and set standards for comprehensive and reliable data collection.
- ❑ **Law Enforcement Fragmentation.** The DOI has urged greater collaboration among its several natural resources/land management law enforcement agencies. We find underachievement at the NPS in this regard. Collaboration hosts enormous opportunity that should be exploited during the forthcoming period of change.

PRIORITY RECOMMENDATIONS

For many of the culture-related reasons cited, changing conditions, resource considerations, and equally important competing DOI and NPS internal interests, many required and desirable park law enforcement changes simply will not occur – understandably and justifiably. This is an immutable political and programming reality. What can and should be done is to concentrate on the following 10 priority actions, at a minimum. The first five are designed to raise the status of law enforcement in the NPS and to restructure and protect the law enforcement culture. The remainder are designed to supply resources to enable rangers to upgrade their capacity to advance the core mission of the NPS, reestablish a proactive law enforcement posture, and enhance the safety of park users and natural and cultural resources.

- 1. Create the position of Associate Director for Emergency Services and Law Enforcement.**
- 2. Create a tiered structure of law enforcement goals, objectives, and effectiveness measures.**
- 3. Ensure that law enforcement objectives are reflected in the NPS strategic plan.**
- 4. Revisit park superintendent law enforcement accountability requirements and protocols.**
- 5. Reestablish a system of strict and frequent park law enforcement audits.**
- 6. 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.**
- 7. Develop a data-driven plan to justify allocation and scheduling of new rangers.**
- 8. Increase productivity of current and future rangers through new technologies, joint efforts with other agencies, and other productivity enhancing initiatives.**
- 9. Establish ranger recruitment, selection, promotion, and performance evaluation policies and programs that conform to professional law enforcement standards.**
- 10. Ensure that every ranger has or has access to a full complement of essential law enforcement equipment and technology.**

NPS is likely to require the better part of the next decade to lift the law enforcement function to the level and status it deserves. It should begin immediately. Rangers should remain patient. Complex systems simply do not change easily. A will to dramatically reconfigure law enforcement is essential. Attention should be paid to principles of change, including meaningful power sharing and collaboration with rangers. In such an environment policy and program solutions should emerge and “implement” more readily and successfully.

CHAPTER I: THE POLICING ENVIRONMENT

The capacity of the NPS to meet its protection obligations is conditioned by a complex mix of factors and trends. Among the most consequential are the number and size of properties/units to be protected; incidence of crime and disorder; law enforcement resources – financial, human, equipment, and technological; education, training, and experience of law enforcement staff.

SECTION 1: THE PARK SYSTEM

According to the National Parks Index 1999-2001, 373 units are under the care and management of the NPS. These include national parks; national monuments; national preserves; national reserves; national lakeshores; seashores; rivers; scenic trails; historic sites; military battlefields; and national memorials. The NPS manages units in 49 states of the Union and in American Samoa, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands. The NPS manages and must police and protect just under 92,000,000 acres of federal, non-federal, and private land, including wilderness areas. (Table 1.) Unless otherwise noted, all statistical data in this chapter comes from the NPS Annual Law Enforcement Reports or special reports provided by the NPS.

Since designation of the National Capital Parks, the National Mall, and the White House in 1790, parks and other types of units have been added continuously. The single largest annual augmentation occurred in 1978 when 33 units were added to the NPS network. Thirty-four (34) units were added during the 1980s and 29 during the 1990s, most prior to 1997. Two designations are currently before Congress. Additional designations will probably be forwarded for decision prior to the termination of the current national administration.

SECTION 2: THE NPS MISSION AND OBJECTIVES

The 1916 congressional act, which established the NPS, sets forth its governing mission:

The service shall promote and regulate the use of the Federal areas known as national parks, monuments, and reservations . . . by such means and measures as conform to the fundamental purpose of the said parks, monuments, and reservations, which purpose is to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.

The most contemporary statement of mission is published in the recently released Strategic Plan (5-15-00, Final Draft):

State	Number of Parks/Units	Acreage
Alabama	5	15,672.96
Alaska	16	54,642,886.34
American Samoa	1	11,500.00
Arizona	20	1,922,201.05
Arkansas	6	141,020.28
California	23	10,572,158.73
Colorado	11	710,969.03
Connecticut	1	60.76
District of Columbia	17	8,877.84
Florida	11	4,651,889.93
Georgia	10	98,782.85
Guam	1	2,994.28
Hawaii	7	117,264.21
Idaho	4	74,021.21
Illinois	1	12.24
Indiana	3	15,339.94
Iowa	2	1,668.19
Kansas	5	11,792.28
Kentucky	3	73,620.71
Louisiana	4	21,142.23
Maine	3	261,331.04
Maryland	13	114,031.67
Massachusetts	14	73,365.41
Michigan	4	1,042,361.50
Minnesota	4	490,875.75
Mississippi	7	221,534.58
Missouri	6	2,169.01
Montana	5	1,136,907.97
Nebraska	5	61,128.15
Nevada	2	3,074,062.08
New Hampshire	1	148.15
New Jersey	3	1,697.55
New Mexico	13	447,436.47
New York	18	68,328.03
North Carolina	8	183,887.37
North Dakota	3	102,569.04
Ohio	6	34,220.09
Oklahoma	3	12,619.27
Oregon	4	197,893.96
Pennsylvania	15	140,681.68
Puerto Rico	1	75.13
Rhode Island	1	4.56
South Carolina	6	42,866.06
South Dakota	4	92,545.03
Tennessee	7	657,385.81
Texas	13	1,282,778.65
Utah	11	2,115,639.02
Vermont	1	643.07
Virginia	14	332,498.47
Virgin Islands	4	20,481.87
Washington	11	3,716,980.32
West Virginia	4	88,840.66
Wisconsin	2	162,211.57
Wyoming	6	2,563,938.96
TOTALS	373	91,838,013.01

The National Park Service preserves unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

A very recent NPS release, *Law Enforcement Programs Study: United States Park Rangers (1998)* opens with the following Vision Statement:

National parks were established as bastions to preserve representative examples of America's most significant natural and cultural treasures. Sanctuaries that not only rekindle the human spirit through recreation and reflective introspection, but also as the contemporary, living link with our cultural history. They are the open books in the undisturbed library of our geological and paleontological history. They protect and allow interpretation of the archaeological clues that help us understand our prehistoric heritage. Parks are ecological safe havens, providing the guarantee of species diversity and genetic viability. These places of refuge are essential to perpetuating America's flora and fauna for their own right, for our enjoyment, for scientific study and as wellsprings of continuous repopulation for surrounding areas beyond park boundaries.

SECTION 3: LAW ENFORCEMENT AUTHORITY

Authority to carry out a Law Enforcement Program is found in the General Authorities Act of 1976 which states that a person designated as a law enforcement employee by the Secretary to the Interior may:

- ❑ Carry firearms and make arrests without warrant for any offense against the United States committed in his presence, or for any felony cognizable under the laws of the United States if he has reasonable grounds to believe that the person to be arrested has committed or is committing such felony, provided such arrests occur within that system or the person to be arrested is fleeing therefrom to avoid arrest.
- ❑ Execute any warrant or other process issued by a court or officer of competent jurisdiction for the enforcement of the provisions of any Federal law or regulation issued pursuant to law arising out of an offense committed in that system, or where the person subject to the warrant or process is in that system in connection with any Federal offense.
- ❑ Conduct investigations (wherever that investigation may lead) of offenses against the United States committed in that system in the absence of investigation thereof by any other Federal law enforcement agency having

investigative jurisdiction over the offense committed or with the concurrence of such other agency (16 U.S.C. 1a-6(b)).

Further authority is summarized in the March 2000 release of Director's Order #9, Law Enforcement Program, under "Controlling Policies":

□ **Congressional Policy**

In considering law enforcement within the context of the Service's overall mission, Congress in 1976 provided the following policy guidance on use of the NPS law enforcement authority:

The Committee intends that the clear and specific enforcement authority contained in this subsection, while necessary for the protection of the Federal employees so involved, will be implemented by the Secretary, to ensure that law enforcement activities in our National Park System will continue to be viewed as one function of a broad program of visitor and resource protection (*House Report No. 94-1569, September 16, 1976*).

□ **4.3 National Park Service Policy**

To fulfill its mission, the NPS will strive to administer areas under its care in such manner that they are free of criminal activity that threatens or compromises the ecological health and integrity of protected natural and cultural resources or disrupts an atmosphere conducive to public safety and enjoyment.

□ **5.1 Law Enforcement Commissions**

Congress has authorized the Secretary of the Interior to designate certain employees of the Department of the Interior as law enforcement officers, with the responsibility to ". . . maintain law and order and protect persons and property within areas of the National Park System" (16 U.S.C. 1a-6(b)).

SECTION 4: VISITATION

Just over 436,000,000 persons visited the national parks in 1999, increases of

- 153,861,000, 54.5% since 1979, an annual average of 2.7%,
- 84,385,000 since 1989, 23.9%, an annual average of 2.4%,
- 48,492,000 since 1995, 12.5%, an annual average of 3.1%.

The last year in which visitation declined was 1994, 1.9%. Visitation was essentially stable in 1999, compared to 1998. The NPS classifies visits as recreation and non-recreation. Recreation visitors remain overnight for varying lengths of stay. Non-recreation visitors stay for one day or less, without overnight stays. Recreation visits have increased by 17,566,572, 6.5%, during the past five years (1994-1999), an annual average of 1.6%. Non-recreation visits have increased by 30,925,393, 26.1%, an annual average of 6.5%. (Table 2.)

Year	Recreation Visits	Non-Recreation Visits	Total Visits	Change - Number	Change - Percent
1979	205,369,795	77,065,306	282,435,101	—	—
1980	220,463,211	79,860,871	300,324,082	17,888,981	6.3
1981	238,592,669	91,070,631	329,663,300	29,339,218	9.8
1982	244,924,579	89,523,436	334,448,015	4,784,715	1.5
1983	243,619,396	82,026,935	335,646,331	1,198,316	0.4
1984	248,785,509	83,885,774	332,671,283	-2,975,048	-0.9
1985	263,441,808	82,748,302	346,190,110	13,518,827	4.1
1986	281,094,850	83,456,649	364,551,499	18,361,389	5.3
1987	287,244,998	85,706,136	372,951,134	8,399,635	2.3
1988	282,451,441	85,538,340	367,989,781	-4,961,353	-1.3
1989	269,339,837	82,511,343	351,911,180	-16,078,601	-4.4
1990	255,581,467	79,581,270	335,162,737	-16,748,443	-4.8
1991	267,840,999	88,027,409	355,868,408	20,705,671	6.2
1992	274,694,549	85,657,396	360,351,945	4,483,537	1.3
1993	273,120,925	114,586,143	387,707,068	27,355,123	7.6
1994	268,636,169	111,519,877	380,156,046	-7,551,022	-1.9
1995	269,564,307	118,239,606	387,803,913	7,647,867	2.0
1996	265,796,163	134,030,276	399,826,439	12,022,526	3.1
1997	275,236,335	142,925,014	418,161,349	18,334,910	4.6
1998	286,762,265	148,897,805	435,660,070	17,498,721	4.2
1999	287,130,879	149,164,999	436,295,878	635,808	0.1

SECTION 5: SERIOUS CRIME

Serious crime consists of Crimes Against Persons: homicide; rape; robbery; and aggravated assault; and Crimes Against Property: burglary; larceny-theft; motor vehicle theft; and arson. The four crimes against persons constitute “violent crime.” These crimes are classified as Part I by the Uniform Crime Reporting system.

Table 3 profiles serious crime in the NPS system for the past five years, 1995-1999. The number of crimes ranged from a low of 4,147 in 1999 to a high of 5,496 in 1997. For the period, reported serious crime declined by 12.1%, 570 offenses, an annual average of 3.0%, 143 offenses. Violent crime declined, 89 offenses, 37.0%. Property crime declined by 481 offenses, 10.7%.

The rate of serious crime in the NPS system in 1999 was 0.95 per 100,000 visitors, 0.03 per 100,000 visitors for violent crime and 0.92 for property crime. Approximately one visitor in every 100,000 experienced criminal victimization in 1999.

Offense	1995	1996	1997	1998	1999	Change - Number	Change - Percent
<input type="checkbox"/> Homicide/Manslaughter	13	15	14	10	9	-4	-30.8%
<input type="checkbox"/> Rape/Attempted Rape	34	30	38	29	29	-5	-14.7%
<input type="checkbox"/> Robbery	29	33	27	25	29	0	0
<input type="checkbox"/> Kidnapping	0	1	1	5	3	--	--
<input type="checkbox"/> Aggravated Assault	<u>164</u>	<u>158</u>	<u>170</u>	<u>159</u>	<u>81</u>	<u>-83</u>	<u>-50.6%</u>
VIOLENT CRIME	240	237	250	228	151	-89	-37.0%
<input type="checkbox"/> Burglary	750	574	461	443	466	-284	-37.9%
<input type="checkbox"/> Larceny/Theft	3,454	3,343	4,515	3,552	3,309	-145	-4.1%
<input type="checkbox"/> Motor Vehicle Theft	136	120	190	102	127	-9	-6.6%
<input type="checkbox"/> Arson	<u>137</u>	<u>156</u>	<u>80</u>	<u>76</u>	<u>94</u>	<u>-43</u>	<u>-31.3%</u>
PROPERTY CRIME	<u>4,477</u>	<u>4,193</u>	<u>5,246</u>	<u>4,173</u>	<u>3,996</u>	<u>-481</u>	<u>-10.7%</u>
TOTALS	4,717	4,430	5,496	4,401	4,147	-570	-12.1%

Source: Annual Law Enforcement Reports

SECTION 6: LESS SERIOUS CRIME

Less serious crimes include simple assault; forgery and counterfeiting; fraud; embezzlement; stolen property; vandalism; weapons; prostitution and commercial vice; sex offenses; drug abuse; gambling; offenses against family and children; driving under

Offense	1995	1996	1997	1998	1999	Change Number	Change Percent
<input type="checkbox"/> Simple Assault	235	237	248	207	207	-28	-11.9%
<input type="checkbox"/> Forgery/Counterfeiting	19	23	19	18	33	14	73.7%
<input type="checkbox"/> Fraud	89	235	225	185	149	60	67.4%
<input type="checkbox"/> Embezzlement	14	22	23	21	30	16	114.2%
<input type="checkbox"/> Stolen Property	318	274	264	287	233	-85	-26.7%
<input type="checkbox"/> Vandalism	3,511	3,586	3,474	3,796	3,484	-27	0.8%
<input type="checkbox"/> Weapons	1,763	1,210	1,386	1,219	1,080	-683	-38.7%
<input type="checkbox"/> Prostitution/Commercial Vice	28	38	42	17	14	-14	-50.0%
<input type="checkbox"/> Sex Offenses	378	363	418	340	437	59	15.6%
<input type="checkbox"/> Gambling	4	1	20	9	1	-3	-75.0%
<input type="checkbox"/> Offenses Against Children	160	126	136	98	115	-45	-28.1
<input type="checkbox"/> Driving While Intoxicated	1,783	1,447	1,334	1,316	1,238	-545	-30.6%
<input type="checkbox"/> Drunkenness	1,529	828	1,067	880	905	-624	-40.8%
<input type="checkbox"/> Drug Abuse	3,824	2,853	3,661	3,437	2,744	-1080	-28.2%
<input type="checkbox"/> Disorderly Conduct	2,799	2,130	2,394	2,274	1,953	-846	-30.2%
<input type="checkbox"/> Liquor Law Violations	5,551	4,496	4,473	4,895	4,251	-1300	-23.4%
<input type="checkbox"/> Resource Violations	14,714	12,196	13,475	13,578	19,840	5,126	34.8%
<input type="checkbox"/> Suspicion	703	470	640	611	1,224	521	74.1%
<input type="checkbox"/> Curfew/Runaways	438	592	272	791	177	-261	-59.5%
<input type="checkbox"/> Thefts	546	265	352	364	401	-145	-26.5%
TOTALS	38,406	31,392	33,923	34,343	38,516	110	0.2%

Source: Annual Law Enforcement Report

the influence; liquor laws; drunkenness; disorderly conduct; vagrancy; suspicion; curfew and loitering; runaways; and all others. Many of these crimes are very serious despite the less serious label. These crimes as designated as Part II by the Uniform Crime Reporting system. Less serious crimes recorded by the NPS for the five-year period 1995 to 1999 are displayed in Table 4.

Reported Part II crimes have ranged from 31,392 in 1996 to 38,516 last year, 1999. The number of reported less serious crimes was almost identical in 1995 and 1999, but fluctuated dramatically during the intervening years:

□	1996	-7,014 (-18.3%)
□	1997	2,531 (+8.1%)
□	1998	420 (+1.2%).

In 1999, less serious crime increased by 4,173 offenses, 12.2%.

Using 1999 as the measure, the most prevalent offense category is resource violations, followed, but not very closely, by liquor law violations, vandalism, and drug abuse. The number of these offenses and proportion of total Part II crimes was:

	<u>Offense</u>	<u>Number</u>	<u>Proportion of Total</u>
□	Resource Violations	19,840	51.5%
□	Liquor Law Violations	4,251	11.0%
□	Vandalism	3,484	9.0%
□	Drug Abuse	2,744	<u>7.1%</u>
			78.6%

The 1999 increase was powered entirely by the change in the number of reported resource violations, 6,262, which exceeded the overall change of 4,173. Sizeable declines were experienced in several categories in 1999 including reported drug abuse (693), liquor law violations (644), curfew/runaway violations (614), and vandalism (312).

SECTION 7: LOCATION OF NPS CRIME

Statistically reliable reports on crime by location (unit) are not readily available from the NPS. The best available data reflects 1997 experience in 146 parks/units. (Table 5.) Only 13 of the 146 units in this data set, less than 10%, reported more than 100 serious crimes in 1997. These 13 parks account for 61% of all reported serious crime. Seventy-five (75) units, 51% of the total, reported 10 or fewer serious crimes. Fifteen

Table 5			
CRIME LOCATION 1997			
Park Name	Serious Offenses	Less Serious Offenses	Total
Yellowstone NP	119	8,787	8,906
Yosemite NP	590	4,430	5,020
Indiana Dunes	61	4,236	4,297
Delaware Water Gap NRA	28	3,447	3,475
Golden Gate/FOPO/MUWO	151	2,940	3,091
Jefferson NEM	55	2,771	2,826
Great Smoky Mountains NP	153	1,916	2,069
Grand Canyon	652	1,310	1,962
Denali NP and Preserve	12	1,589	1,601
Sequoia and Kings Canyon	44	1,441	1,485
Chattahoochee River NRA	318	1,149	1,467
Glen Canyon	177	1,222	1,399
Valley Forge NHP	35	1,319	1,354
White Sands	200	1,000	1,200
Rocky Mountain NP	36	1,097	1,133
Colonial National Historical Park	7	1,085	1,092
Assateague Island National Seashore	13	914	927
Acadia NP	24	750	774
Fredericksburg & Spotsylvania NMP	25	745	770
New River Gorge National River	172	563	735
Mammoth Cave NP	23	628	651
Gettysburg National Military Park	12	619	631
Cape Cod National Seashore	30	579	609
Bryce Canyon NP	3	594	597
Blue Ridge Parkway	85	507	592
Joshua Tree NM	40	538	578
Olympic National Park	102	424	526
Chesapeake & Ohio Canal NHP	46	473	519
Haleakala NP	11	482	493
Statue of Liberty NM	63	420	483
Buffalo	33	431	464
Chickamauga-Chattanooga NMP	79	372	451
Mesa Verde NP	12	414	426
Big South Fork NRA	13	409	422
Shenandoah National Park	184	230	414
Petrified Forest NP	21	393	414
Point Reyes NS	20	383	403
Lake Roosevelt NRA	42	359	401
Lake Mead NRA	400	*****	400
Everglades National Park	222	155	377
Sleeping Bear Dunes	21	355	376
Kennesaw Mountain NBP	6	366	372
Zion NP	34	337	371
Big Cypress National Preserve	97	265	362
Cuyahoga Valley NRA	75	274	349
Ozark NSR	21	320	341
Independence NHP	28	308	336
Cape Hatteras Group	39	289	328
Castillo de San Marco	6	301	307
Saguaro NM	8	289	297

Park Name	Serious Offenses	Less Serious Offenses	Total
Jean Lafitte	70	225	295
Mount Ranier National Park	48	245	293
Death Valley NM	23	236	259
Canaveral National Seashore	93	163	256
Little River Canyon	9	236	245
Richmond National Battlefield Park	14	230	244
Saint Croix NSR	15	224	239
Upper Delaware S&R River	4	223	227
Biscayne National Park	8	207	215
Lincoln Home NHS	10	195	205
Canyonlands NP	0	204	204
Morristown NHP	5	186	191
Great Sand Dunes	1	184	185
Big Thicket	12	171	183
Cumberland Gap NHP	42	133	175
Gulf Islands NS	61	109	170
Kenai Fjords National Preserve	16	153	169
Organ Pipe Cactus NM	15	154	169
Amistad	20	125	145
Lava Beds NM	6	130	136
Katmai NP and Preserve	0	134	134
Canyon de Chelly	10	121	131
Santa Monica Mountains NRA	5	126	131
North Cascades NPS Complex	8	122	130
Badlands NP	4	124	128
Isle Royale NP	0	128	128
Dinosaur NM	7	114	121
Glacier NP	22	96	118
Chiricahua NM	7	96	103
Big Bend	8	92	100
Hawaii Volcanoes NP	38	59	97
Mount Rushmore NP	1	94	95
Redwood NP	78	16	94
Sitka NHP	23	66	89
Natural Bridges NM	1	88	89
Cumberland Island NS	0	88	88
Chamizal	1	86	87
Boston NHP	24	61	85
Wind Cave NP	5	79	84
Coronado NM	6	68	74
Steamtown NHS	7	54	61
Fort Donelson NB	1	59	60
Lassen Volcanic NP	12	38	50
Horseshoe Bend NMP	0	48	48
Shiloh NMP	44	2	46
Pictured Rocks NL	13	27	40
Channel Islands NP	4	35	39
Devils Tower NM	3	36	39
Flagstaff Area	3	36	39
Bandelier	13	22	35

Table 5			
CRIME LOCATION 1997 (continued)			
Park Name	Serious Offenses	Less Serious Offenses	Total
Klondike Gold Rush NHP	1	34	35
Glacier Bay NP & Preserve	1	33	34
Curecanti NRA	11	22	33
Antietam NB	2	30	32
San Juan NHS	31	0	31
Voyageurs NP	10	21	31
Minute Man NHP	3	26	29
Hopewell Furnace NHS	3	24	27
Timucuan Ecological & Historic Pres.	3	23	26
Padre Island	8	17	25
Cedar Breaks	0	25	25
Crater Lake National Park	4	20	24
Ocmulgee National Monument	2	22	24
Bering Land Bridge N. Pres.	0	24	24
Chaco Culture	8	15	23
El Morro	2	20	22
Carlsbad Caverns	11	10	21
Allegheny Portage RR NHS	14	4	18
Gates of the Arctic NP and Preserve	3	15	18
Apostle Islands NL	1	16	17
Devils Postpile NM	14	0	14
Fort Pulaski NM	8	6	14
Theodore Roosevelt NP	2	11	13
Lake Clark NP and Preserve	0	13	13
Black Canyon of the Gunnison NM	0	13	13
Great Basin	0	13	13
Pinnacles NM	3	9	12
Capitol Reef NP	1	11	12
City of Rocks NR	2	8	10
Florissant Fossil Beds NM	3	6	9
Pu'uhonua O Honaunau	2	7	9
Scotts Bluff NM	1	8	9
Guadalupe Mountain	1	8	9
Pecos	0	8	8
Kings Mountain NMP	6	1	7
El Malpais	2	4	6
Arches NP	5	0	5
Oregon Caves National Monument	2	2	4
Grand Portage	2	2	4
Timpanogos Cave NM	1	3	4
Johnstown Flood National Memorial	2	1	3
Fire Island National Seashore	1	0	1
Ft. McHenry National Monument	0	1	1
Yukon-Charlie Rivers NP	0	0	0
Aztec Ruins	0	0	0
Moores Creek NBP	0	0	0

(15) reported none. The data indicate that reported criminal activity is highest, as expected, in large/heavily-visited units such as Grand Canyon and Yosemite. Several units reported very few serious crimes but substantial numbers of less serious crime: Denali NP and Preserve (12 and 1,589); Colonial National Historic Park (7 and 1,085); Delaware Water Gap NPA (28 and 3,447).

SECTION 8: OTHER OFFENSES

Ranger enforcement and protection actions result in citations (and arrests) for numerous “other offenses,” which include resource, permit (fishing and hunting), and traffic violations. The total number of other offenses recorded during the past five years is displayed in Table 6.

Table 6			
OTHER OFFENSES 1995-1999			
Year	Number of Offenses	Annual Change: Number	Annual Change: Percent
1995	58,456	--	--
1996	49,803	-8,653	-14.8
1997	72,327	22,524	45.2
1998	34,343	-37,984	-52.5
1999	66,714	32,371	94.2

For the five-year period number of other offenses increased 8,258, 14.1%. The five-year pattern is characterized by extreme fluctuation with 34,000 offenses in 1998 and 72,000 in 1997.

The aggregated data displayed in Table 6 is the best the NPS has at this time. Distribution of data by individual offense or by units is available only at the unit level and it is not available on a service wide format.

SECTION 9: CLEARANCES

Crimes are cleared principally by arrests and secondly by a variety of “exceptional” means, including unwillingness of complainants and victims to sustain criminal proceedings. NPS clearance rates for serious and less serious crimes are displayed in Tables 7 and 8.

Table 7

**CLEARANCE RATES – SERIOUS CRIMES 1995-1999
(Percent)**

Offenses	1995	1996	1997	1998	1999	National Average 1998*
<input type="checkbox"/> Homicide/Negligent Homicide	37.5	28.6	30.0	28.5	50.0	70.9
<input type="checkbox"/> Rape/Attempted Rape	30.2	14.3	29.4	34.2	31.5	45.0
<input type="checkbox"/> Robbery	16.7	11.4	35.2	5.4	37.5	30.4
<input type="checkbox"/> Aggravated Assault	42.9	43.8	56.4	39.1	36.2	57.7
<input type="checkbox"/> Burglary	17.3	5.8	9.7	6.7	8.6	13.3
<input type="checkbox"/> Larceny – Theft	2.4	11.9	21.5	10.2	13.5	21.2
<input type="checkbox"/> Motor Vehicle Theft	12.5	11.7	14.2	21.4	20.6	15.1
<input type="checkbox"/> Arson	<u>17.3</u>	<u>6.7</u>	<u>6.0</u>	<u>3.9</u>	<u>4.9</u>	<u>19.1</u>
INDEX TOTAL	11.7	12.8	21.7	11.4	14.0	22.0

* Cities, 25,000 – 49,999. Of the several categories of UCR clearance data, this one encompasses the largest number of cities, 598.

	1995	1996	1997	1998	1999
<input type="checkbox"/> Other Assaults	36.33	31.32	34.08	32.16	32.88
<input type="checkbox"/> Forgery/Counterfeiting	26.32	39.13	10.53	10.53	17.65
<input type="checkbox"/> Fraud	38.04	39.33	15.68	29.79	17.11
<input type="checkbox"/> Embezzlement	33.33	30.43	15.38	31.82	46.67
<input type="checkbox"/> Stolen Property	23.80	25.00	54.64	23.23	26.23
<input type="checkbox"/> Vandalism	7.41	3.54	6.03	5.20	7.27
<input type="checkbox"/> Prostitution/Vice	10.34	16.28	6.38	11.11	57.14
<input type="checkbox"/> Sex Offenses	27.20	21.89	35.14	29.19	49.66
<input type="checkbox"/> Drug Abuse	46.92	47.05	27.38	23.17	40.00
<input type="checkbox"/> Possession	56.86	45.71	52.93	56.72	59.73
<input type="checkbox"/> Gambling	--	100.00	76.19	100.00	--
<input type="checkbox"/> Offenses Against Children	24.40	19.23	40.43	24.07	32.77
<input type="checkbox"/> DWI	70.92	68.05	72.51	75.65	84.19
<input type="checkbox"/> Liquor Laws	53.41	48.00	44.84	44.90	64.47
<input type="checkbox"/> Drunkenness	43.41	92.72	52.79	63.93	70.99
<input type="checkbox"/> Disorderly Conduct	37.30	36.78	32.84	27.03	39.77
<input type="checkbox"/> ARPA Violations	20.86	9.73	14.37	11.95	19.20
<input type="checkbox"/> All Other Offenses	27.60	25.13	30.06	38.05	28.36
<input type="checkbox"/> Suspicion	7.75	7.76	11.60	25.97	18.28
<input type="checkbox"/> Curfew/Loitering	3.28	7.76	30.21	6.48	44.54
<input type="checkbox"/> Runaways	31.08	28.33	33.33	28.30	44.62
<input type="checkbox"/> Thefts	<u>21.76</u>	<u>38.83</u>	<u>5.68</u>	<u>1.36</u>	<u>20.29</u>
TOTAL	31.3	28.3	31.4	36.2	31.9

Rates of clearance for serious crime have ranged from 11.4% in 1998 to 21.7% in 1997. Four of the five past years have been consistent, ranging from 11.7% to 14.0%. Noticeable fluctuations characterize several individual offense categories. Robbery clearances range from 5.4% to 37.5%, rape from 14.3% to 34.2%, and larceny theft from 2.4% to 21.5%. This is understandable with regard to robbery and rape, which are reported in small numbers. The variation in larceny-theft is not explained by volume. Larceny-theft clearance rates are reasonably consistent in three of five years.

NPS clearance rates fail to approach national experience in most categories. The NPS overall/index rate was 14% in 1999, compared to a national rate of 22% (in 1998). In 1999, NPS clearance performance exceeded national averages in two categories, robbery and motor vehicle theft. It was below national averages in the remaining six categories.

Rates of clearances for less serious crimes, displayed in Table 8, range from 28.3% in 1996 to 36.2% in 1998. Clearances in the highest volume offense categories, in 1999 were:

<input type="checkbox"/>	ARPA Violations	19.2%
<input type="checkbox"/>	Liquor Law Violations	64.5%
<input type="checkbox"/>	Vandalism	7.3%
<input type="checkbox"/>	Drug Abuse	40.0%

For DWI and disorderly conduct, moderate volume offense categories, clearance rates were 84.2% and 39.8%.

SECTION 10: SERVICES

Table 9 displays trends in five classes of services provided by law enforcement rangers (or three classes of services and two types of special enforcement – boating and aircraft incidents). In 1999, almost 114,000 service activities were recorded, an increase of 11,504 since 1994, 11.2%, an annual average of 2.2%. Educational (interpretation) represented almost 20% of total service activity in 1999. Boating incidents involving enforcement actions represented 4.2% of service activity, numbering almost 4,800 in 1999. Search and rescue events numbered just under 1,000. “Other” accounted for 75% of the total. A breakdown of the components comprised by this category and number of services provided, was not readily available. The fluctuations in recordings in individual categories are so extreme as to call the validity of the entire data set into question.

Table 9								
SERVICE ACTIVITIES 1994-1999								
Services	1994	1995	1996	1997	1998	1999	Change – Number	Change – Percent
Educational	33,216	34,848	2,669	47,279	52,655	22,695	-10,521	-31.7%
Other Service Incidents	62,907	62,746	5,162	58,799	27,238	85,308	22,401	35.6%
Search and Rescue	3,137	2,185	2,669	2,846	2,252	965	-2,172	-69.2%
Boating LE Incidents	2,958	6,207	5,162	5,577	5,594	4,745	1,787	60.4%
Aircraft LE Incidents	<u>151</u>	<u>262</u>	<u>350</u>	<u>232</u>	<u>220</u>	<u>160</u>	<u>9</u>	<u>5.9%</u>
TOTALS	102,369	106,248	16,012	114,733	87,959	113,873	11,504	11.2%

SECTION 11: TRAFFIC ACCIDENTS AND ENFORCEMENT

NPS rangers engage heavily in traffic activity. Total number of motor vehicle accidents for the past six years are listed by year in Table 10:

Table 10				
TRAFFIC INCIDENTS 1994-1999				
Year	Number	Annual Change – Number	Annual Change – Percent	
<input type="checkbox"/> 1994	46,842	--	--	
<input type="checkbox"/> 1995	48,554	1,712	3.7	
<input type="checkbox"/> 1996	36,917	-11,637	-24.0	
<input type="checkbox"/> 1997	52,639	15,722	42.6	
<input type="checkbox"/> 1998	43,916	-8,723	-16.6	
<input type="checkbox"/> 1999	54,336	10,420	23.7	

For the six-year period, this class of activity shows a 16% increase, almost 7,500 incidents. Like other profiles, traffic activity is characterized by unexpected fluctuation.

SECTION 12: RESOURCES – PROTECTION EXPENDITURES

Table 11 traces protection expenditures for the six-year period 1994-1999. "Protection" includes law enforcement, structural fire, emergency medical, search and rescue, and fee collection services. Expenditures increased by \$86,000,000, 139%. Almost the entire increase occurred in the 1995-1997 period, the largest increment (\$56,300,000) in 1995. Last year, 1999, expenditures paralleled those of 1997, after a decline in 1998.

Law enforcement expenditures during the six-year period, was:

<input type="checkbox"/> 1994	\$60,808,419
<input type="checkbox"/> 1995	\$72,009,742
<input type="checkbox"/> 1996	\$84,407,916
<input type="checkbox"/> 1997	\$83,938,425
<input type="checkbox"/> 1998	\$80,051,710
<input type="checkbox"/> 1999	\$94,609,553

For the period, expenditures increased \$33,801,000, 55.6%, an annual average of 11.1%.

Table 11								
RESOURCES – PROTECTION EXPENDITURES							1994-1999	
Cost Category	1994	1995	1996	1997	1998	1999	Change – Dollars	Change – Percent
<input type="checkbox"/> Direct Costs	\$60,808,419	\$115,732,742	\$128,941,716	\$144,266,425	\$127,386,710	\$145,228,553	\$84,420,134	138.85
Procurement/Financial Assistance								
- Contracts	237,229	690,043	1,437,407	577,061	557,432	647,559	410,330	172.9%
- Grants	196,207	210,762	175,176	182,992	221,172	150,594	-45,613	-23.2%
- Cooperative Agreements	50,495	892,141	662,982	471,319	8,703	526,816	476,321	943.3%
- Reimbursable	--	--	35,000	--	--	156,000	--	--
<input type="checkbox"/> Emergency Costs/ Contingency Fund Utilization	<u>467,393</u>	<u>562,510</u>	<u>1,780,237</u>	<u>2,014,060</u>	<u>904,067</u>	<u>1,155,411</u>	<u>688,018</u>	<u>147.2%</u>
TOTALS	\$61,759,743	\$118,086,198	\$133,032,518	\$147,511,857	\$129,078,081	\$147,864,933	\$86,105,190	139.4%

SECTION 13: RESOURCES – STAFFING

Trends in law enforcement staffing for the six-year period 1994-1999 are displayed in Table 12. Total staffing has declined by 59 positions, 2.5%. Since 1995, the “spike” in this profile, total staffing has declined by 237 positions, 9.4%. Every class of personnel is characterized by a decrease. There are 149 fewer permanent protection rangers (resource officers) today than there were in 1994. The number of seasonals has increased only marginally, 19, 3.4%.

SECTION 14: STAFF PROFILE

The NPS has not been able to assemble reliable data on staff characteristics. Workforce survey data serves as a useful surrogate. Tables 13, 14, 15, and 16 profile important dimensions of the NPS law enforcement staff: age, experience, and education. Gender data was available from a separate source.

The Age Profile, Table 13, reflects a normal age/rank distribution pattern. The NPS protection force is weighted in the 30-55 age range, 71% of the total. Variations among position classes are not dramatic. Park superintendents, as a class, are older than rangers, including chief rangers. Special agents, as a class, are older than commissioned rangers.

The Experience Profile, Table 14 reveals concentrations of veteran employees in every position class. Eighty-eight percent (88%) of rangers have more than five years experience. Almost 70% have 10 or more years. Every chief ranger in this data set has 10 or more years experience. The class has a heavy concentration of chiefs with 20 or more years of service, including 34 with more than 25 years. District rangers, a class of supervisors is also heavily experienced, with the greatest concentration having 21-25 years experience, followed closely by the 16-20 years group.

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Table 12								
RESOURCES – LAW ENFORCEMENT STAFFING 1994-1999								
Classification	1994	1995	1996	1997	1998	1999	Change - Number	Change – Percent
<input type="checkbox"/> Rangers								
- Special Agents (CI)	46	58	57	59	55	59	13	28.2%
- Police	4	0	2	0	15	0	-4	-100.0%
- Resource Officers	<u>1,686</u>	<u>1,602</u>	<u>1,465</u>	<u>1,545</u>	<u>1,413</u>	<u>1,528</u>	<u>-158</u>	<u>-9.3%</u>
Subtotal	1,736	1,660	1,524	1,604	1,483	1,587	-149	-8.6%
<input type="checkbox"/> Rangers								
- Seasonal	552	679	642	656	591	571	19	3.4%
<input type="checkbox"/> Guards	2	27	37	31	28	21	19	950.0%
<input type="checkbox"/> Non-Federal								
- Special Agents (CI)	36	1	0	0	0	0	-36	-100.0%
- Police	10	100	28	25	22	28	18	180.0%
- Resource Officers	0	5	13	15	8	73	73	--
- Guards	<u>3</u>	<u>45</u>	<u>45</u>	<u>8</u>	<u>3</u>	<u>0</u>	<u>-3</u>	<u>-100.0%</u>
Subtotal	<u>49</u>	<u>151</u>	<u>86</u>	<u>48</u>	<u>33</u>	<u>101</u>	<u>52</u>	<u>106.1%</u>
TOTALS	2,339	2,517	2,289	2,339	2,135	2,280	-59	-2.5%

Table 13
AGE PROFILE 2000

Position Class	20-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61-65	Total
<input type="checkbox"/> Commissioned Rangers	9	67	119	134	100	78	46	9	1	563
<input type="checkbox"/> Special Agents	0	0	0	4	5	14	6	1	0	30
<input type="checkbox"/> District Rangers	1	1	5	18	37	26	19	5	0	112
<input type="checkbox"/> Chief Rangers	0	1	2	15	38	38	33	4	0	131
<input type="checkbox"/> Staff Park Rangers	0	2	1	2	9	6	6	1	0	27
<input type="checkbox"/> Park Superintendents	<u>1</u>	<u>0</u>	<u>2</u>	<u>5</u>	<u>20</u>	<u>39</u>	<u>45</u>	<u>37</u>	<u>7</u>	<u>146</u>
TOTALS	11 (11%)	71 (7.0%)	139 (12.8%)	178 (17.6%)	209 (20.7%)	201 (19.9%)	155 (15.4%)	47 (4.7%)	8 (0.1%)	1,009

Table 14												
EXPERIENCE PROFILE 2000												
Position Class	0-1	2-3	4-5	6-7	8-9	10-11	12-15	16-20	21-25	26-30	30+	Total
<input type="checkbox"/> Commissioned Rangers	7	25	34	46	64	101	118	83	47	28	2	555
<input type="checkbox"/> Special Agents	0	0	0	0	0	0	5	5	11	8	1	30
<input type="checkbox"/> District Rangers	0	1	1	0	1	5	19	30	34	14	7	112
<input type="checkbox"/> Chief Rangers	0	0	0	0	0	6	10	27	54	23	11	131
<input type="checkbox"/> Staff Park Rangers	0	0	1	1	0	0	3	6	11	3	2	27
<input type="checkbox"/> Park Superintendents	0	0	0	2	0	4	2	21	41	42	39	151
TOTALS	7	26	36	49	65	116	157	172	198	118	62	1,006
(Percent)	(0.7%)	(2.6%)	(3.6%)	(4.9%)	(6.5%)	(11.5%)	(15.6%)	(17.1%)	(19.7%)	(11.7%)	(6.2%)	

As a class (within class) no group has greater seniority/experience than park superintendents. Just over 25% have 30 years of service or more. Roughly equal proportions occupy the 21-25 and 26-30 years of service categories. The law enforcement experience of park superintendents ranges dramatically. Just over 40% (who responded to the workforce survey) have no experience as a law enforcement ranger. An almost equal number, 41%, have 10 years of experience or more. (Table 15.)

Years	Number	Percent
None	63	42.0%
1-2	6	4.0%
3-4	6	4.0%
5-9	14	9.3%
10-14	19	12.7%
15-19	19	12.7%
20 +	<u>23</u>	<u>15.3%</u>
TOTALS	150	100.0%

Workforce survey responses show that 82% of NPS law enforcement rangers and park superintendents have at least a bachelor's degree. Seven percent (7%) have a master's degree. Less than 20% of rangers and superintendents (18.4%) do not have a college degree. (Table 16).

Among classes, proportions with a bachelor's degree or higher are as follows:

- Superintendent 92%
- Commissioned Ranger 78%
- Special Agent 77%
- District Ranger 87%
- Chief Ranger 91%
- Staff Park Ranger 85%

		Table 16						
		EDUCATION					2000	
		H.S.	Some College	A.A.	B.A.	Grad Work	M.A.	Total
<input type="checkbox"/>	Superintendent	--	7	5	60	31	48	151
<input type="checkbox"/>	Commissioned Ranger	4	57	62	362	43	33	561
<input type="checkbox"/>	Special Agent	--	3	4	15	3	5	30
<input type="checkbox"/>	District Ranger	2	6	7	78	10	9	112
<input type="checkbox"/>	Chief Ranger	--	10	2	91	13	15	131
<input type="checkbox"/>	Staff Park Ranger	--	--	4	20	1	2	27
<input type="checkbox"/>	Decline to State	<u>4</u>	<u>1</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>--</u>	<u>5</u>
		10	84	84	626	101	64	969

The IACP workforce survey response suggests that the ranger force (five categories) is 84% male and 16% female. Park superintendents are 79% male and 21% female. A more accurate source of numbers and assignments of females is the Women in Law Enforcement Study, March 2000. This study places the number of female employees with current commissions is 263. There are 32 female chief rangers.

Data on race/ethnicity was not supplied by the NPS (nor called for by the IACP workforce survey).

SECTION 15: LINE-OF-DUTY DEATHS AND ASSAULTS

Since 1994, a six-year period, 163 rangers have been assaulted and four have been killed, two by felonious attack and two by accident or negligent act. (Table 17.) The number of assaults has fluctuated but is declining. The two felony deaths occurred during the past two years.

Table 17							
LINE OF DUTY ASSAULTS AND DEATHS							
Event	1994	1995	1996	1997	1998	1999	Total
LE Officers Killed by Felonious Assault	0	0	0	0	1	1	2
LE Officers Killed by Accident/Negligent Act	1	0	1	0	0	0	2
LE Officers Assaulted	<u>70</u>	<u>48</u>	<u>36</u>	<u>40</u>	<u>57</u>	<u>30</u>	<u>163</u>
TOTAL	71	48	37	40	58	31	167

Source: Annual Law Enforcement Reports

SECTION 16: IMPLICATIONS AND OBSERVATIONS

The factors and trends examined above have important implications for policing the national parks – today and in the future – and for judging the capacity of the law enforcement function to contribute to the core mission of the NPS.

Park System. The sheer number of units, extreme variations in size (acreage) and visitation, their geographical dispersion, and long distances between them complicate and challenge law enforcement management. This configuration of factors limits potential for standardization, in many areas; resource leveraging; convenient interpersonal communications; and management control. The factors add complexity to system-wide law enforcement planning, evaluation, and human resource policies and practices.

These factors validate, in our view, the NPS decentralization initiative of the mid/late 90s. The breadth and diversity of the park system demands local management of and accountability for the law enforcement function. Passing accountability to park superintendents was an informed and enlightened move. This “responsibility structure” should be retained along with strengthened support services at the central/WASO level. Decentralization has not occurred without costs, erosion of central direction, and control being paramount.

- **Visitation.** In the municipal and county setting, population is a powerful correlate of law enforcement requirements. Population growth, police workload, and police resources requirements correlate positively. Visitation is the NPS equivalent of municipal and county population. It is a primary service base. The service population of the NPS, 436,000,000 (visits) in 1999, an average of over 1,000,000 per day, rivals that of many of America’s largest urban cities and centers, and it is growing.

Visitation has been increasing at an annual average of 3.1% since 1995, though it increased only 0.1% in 1999. At a continuing rate of 3.1%, 13 million additional visits may have to be serviced by NPS units each year for the next several years. The visitation trend alone argues for resource/staffing augmentation.

- **Serious Crime.** Parks are very safe places for visitors. Less than one visit in every 100,000 results in victimization and the victimization is less likely to result from a violent rather than a non-violent act. Both violent crime and property crime declined in 1999, a second successive annual decline. Reported levels of crime and trends in crime in the parks do not argue for movement beyond normal staffing augmentations or augmentations suggested by other trends and factors.

Questions of acceptability of current levels of park crime have to be answered by the DOI, NPS, and their clientele.

- **Less Serious Crime.** Less serious crime is more prevalent than serious, but still marginal in rate of occurrence. Nine (9) less serious crimes were

recorded in 1999 for each 100,000 visits. Less serious crime has been trending upward since 1996 and now stands at the 1995 level.

Paralleling the reasonable overall rate of less serious crime, are several dimensions that require more detailed evaluation and continued monitoring by the NPS. Reported/discovered resource violations have increased substantially in recent years, 35% since 1995. The increase could be due to greater citizen disregard for the parks, more aggressive/proactive ranger activity, or both. If the increase is due to increasing citizen disregard for the environment of the parks, and/or a function of increasing visitation, interventions are indicated – including staffing augmentation. NPS management needs to construct a data system to unravel causation. The current data system doesn't seem up to the task.

Less serious crime data document fall-offs in recorded drug abuse offenses, DWIs, weapons violations, and disorderly conduct incidents. The causation possibilities are same as those listed above. In this instance, however, particularly when visitation increases are taken into account, experience and anecdotal evidence suggests a fall-off in proactive order-maintenance capacity of rangers, which, in turn, calls for intensified field activity by an augmented staff of law enforcement rangers and/or other interventions.

- **Location.** The park-specific crime data are instructive for demonstrating the diversity of policing environments and ranger role requirements and potentials. Parks with high incidence of crime seem to need more specialized law enforcement rangers and provide the opportunity to employ them cost-effectively. In parks with low and marginal incidence of crime the need for and use of the generalist ranger is the cost-effective option.
- **Other Offenses.** “Other offenses” are increasing by 3.5% annually. Absence of detailed data precludes examination of types of offenses included in this broad class and emphasis among the types. Issuing “other offense data in aggregate form conceals identification of specific problems that exist and development of targeted responses. This is another crime and service database shortcoming that requires correction.
- **Clearances.** Nationally, about one of five serious crimes is cleared. Violent crimes are cleared at a higher rate. The NPS clears crime at a lower rate than law enforcement agencies nationally. This is attributable, in large measure, to the transience of the service population and a limited corps and geographical dispersion of investigative specialists – the special agents. Simply, the NPS is not positioned to perform as well in this area as many law enforcement agencies. Still, a detailed review of follow-up investigations practices, with a focus on improvement, is well advised. Like residents of communities across the U.S., park visitors expect law

enforcement agencies to close cases, bring offenders to justice, and return property.

- **Service Activities**. The service data raises many issues and questions that NPS management must examine and answer to illuminate what may be changing dimensions in park protection. Service activities are expanding, at a rate of 2.3% annually, but changing in composition. Law enforcement rangers may be engaging in less education work – a core NPS function. The fluctuations in reported educational activity are so extreme, however, that we regard the data as unreliable. Similarly, search and rescue data, ranging from 2,200 to 3,200 incidents for five years, then plummeting to fewer than 1,000 in 1999, is suspect. “Other Service Incidents” also shows extreme variation.
- **Workload**. The NPS is not positioned to collect and report law enforcement workload comprehensively and reliably. Recognizing this shortcoming, a major initiative was undertaken in 1997. V-RAP, the Visitor Management Resource Protection Assessment Program, was the first attempt to systematically catalog ranger activities, quantify them, and based on these results, estimate staffing requirements. This excellent first step notwithstanding, the NPS does not possess an empirically assembled base of law enforcement workload data. It cannot produce reliable aggregate and supporting park-specific data on how much work rangers do, the composition of the work, and whether workload is changing – collectively and by park/unit. This condition undermines its capacity to petition for increased staff resources and limits potential for success in the intensely competitive federal environment.
- **Resources – Expenditures**. Expenditures for protection have increased 139% since 1994. Since 1995, they have increased by \$29,800,000, 25.2%, an annual average of 6.3%. The major infusion of resources occurred in 1995, an increase of \$56,000,000.

During the same period, expenditures for law enforcement have increased almost \$34 million, 55.6%, an annual average of 11.1%. The trend has been uneven, with two small declines, during the six-year period, and sizable increases in 1995, 1996, and 1999.

Despite generous increases and continuing investments, we believe the law enforcement function remains under-funded. A backlog of staffing and non-staffing needs is present and re-positioning for the future is required. The NPS reports, for example, that 15 parks in the Midwest Region and 12 parks in the Southeast Region have no law enforcement rangers. It reports that 15 additional parks in the Midwest Region have only one law enforcement ranger. This results in no backup for the rangers and no coverage for the parks, two days a week.

Documenting how the additional millions appropriated have been invested and demonstrating results achieved is an obligation of NPS management and important to credibility as the agency seeks new resources.

- **Resources – Staffing.** The increase in expenditures between 1994 and 1999, 56%, has been paralleled by a 2.5% overall increase in staffing, but an 8.65% decrease in rangers, 149 positions. Clearly, increased appropriations and expenditures have not produced additional permanent positions. The number of seasonals has fluctuated, ranging between 550 and 675, but without the relationship expected – increased authorization and use of seasonals during years when the number of permanents were reduced/unavailable. The relationship is attributable, presumably, to financial and/or recruitment considerations.

Considering increases in number of units to be policed, 14 during the past six-year period, and increased visitation, 56,000,000, the NPS pattern of law enforcement staffing is not suggestive of needs-driven allocation decisions and is patently illogical and erratic. The NPS would do well to employ a staffing model that provides sound and consistent results. The proper utilization of V-RAP indicators may meet this objective. A segregated law enforcement budget would be a useful corollary.

- **Staff Profile.** Law enforcement staffs composed of sizable concentrations of young and older members present operations and management challenges. Young (modestly experienced) officers require closer supervision and more training than experienced officers and are prone to more mistakes. Concentrations of older officers, particularly in supervisory and command ranks, present the prospect of loss of institutional expertise and require attention to replacement and leadership grooming. Neither of these conditions is present in the NPS setting. Both age and experience profiles indicate presence of seasoned ranger personnel, well distributed along age/experience continuums.

More than occasional turnover/retirement of park superintendents is not out of the realm of possibility. Given their status as chief executive officers of the law enforcement function at the park level, the implications of this eventuality are profound. Much is made of the qualifications of superintendents who lack law enforcement background – 47% according to our survey. This appears to be an opportune moment to examine/set qualifications for those promoted to superintendent positions in the future. A combination of law enforcement experience or training seems sensible as a minimum requirement.

- **Line-of-Duty Deaths and Assaults.** The brightening picture of crime reduction across the country in recent years has been offset by the magnitude and violence of high profile events such as Columbine and the

Oklahoma City bombings. Rising concern about terrorism potential, especially in public venues, is omnipresent. Park Service rangers experience the highest officers-assaulted rate among federal law enforcement agencies, including ATF, DEA, INS, and the FBI. This fact, coupled with the 1998 and 1999 slayings of NPS officers, has nurtured a pervasive sense of workplace threat. NPS law enforcement rangers have crossed a threshold of concern for their own safety and protection – properly so. Today’s ranger expects more backup for serious calls and events, better communications equipment, better defensive tactics training, and more effective recruitment and selection techniques for future rangers. They deserve nothing less.

SECTION 17: SUMMARY

The foregoing profiles reveal a burgeoning law enforcement service population and expanding territorial responsibilities. They reveal static law enforcement production, indeed, decline in certain areas that require proactive enforcement, and eroding staff capacity, especially the number of permanent rangers. These trends, coupled with compelling and reinforcing findings from field work, most notably intolerable ranger safety conditions and diminishing proactive capacity to protect visitor and natural resources, justify the conclusions that the NPS law enforcement capacity is not currently sufficient to maximize contribution to the agency’s core mission nor is park law enforcement positioned to meet 21st century protection challenges.

This report will detail many actions that are necessary to reposition park law enforcement, including a sizable increase in staff. The NPS is blessed with strong assets at the field level, none more important for organizational transformation than well educated, experienced, and committed rangers. We find the NPS law enforcement function to be under-resourced, under-valued, and under-managed.

CHAPTER II: THE NPS LAW ENFORCEMENT INFRASTRUCTURE

The capacity of the NPS to meet its protection obligation is dependent on the level and quality of resources committed and how those resources are invested and consumed – organized, managed, and controlled. This chapter examines the NPS law enforcement infrastructure: organization; staffing; objectives; written directives; equipment; technology; and human resources practices.

SECTION 1: ORGANIZATION

The Director of the National Park Service establishes and approves service-wide (NPS) policies and procedures. The Director reports to the Assistant Secretary for Fish, Wildlife and Parks. Law Enforcement Policies must be further reviewed by the Director, Office of Managing Risk and Public Safety (MRPS), in the Office of the Secretary of the Interior. The Office of Managing Risk and Public Safety (MRPS) has ultimate oversight for law enforcement operations of the National Park Service; Park Police; Bureau of Land Management; U.S. Fish and Wildlife Service; and the Bureau of Reclamation. This official is responsible for promulgating law enforcement policy, procedures, and standards; coordinating and monitoring implementation of all law enforcement programs through a standardized inspections program; providing advance approval and clearance for candidates selected as bureau or office law enforcement administrators.

At the field/park level, primary responsibility for the law enforcement function rests with the park superintendents. The superintendent has overall responsibility for management of park operations, including management of the law enforcement program. The superintendent exercises control of the law enforcement program through supervision of the chief park ranger/senior law enforcement official. The superintendent has responsibility for ensuring that law enforcement programs are managed in full compliance with directives, policies, and law.

Chief Park Rangers, also called Senior Law Enforcement Officers, ensure that law enforcement operational activities are in compliance with directives, policies, and law. They are trained and experienced in the supervision of law enforcement programs. These commissioned employees are thoroughly knowledgeable of directives, laws, standards, and practices that govern applicable federal law enforcement programs.

Park law enforcement staffs include Park Rangers, Special Agents, and, in some cases, jailers. Commissioned park rangers perform law enforcement as well as resource stewardship, education, and visitor use management. These positions are frontline field “law enforcement officers” as defined in DM446. Commissioned rangers provide for tranquil, sustainable use and enjoyment of park resources while simultaneously protecting these resources from all forms of degradations.

- ❑ Special Agents are commissioned employees who have completed at least three years with the NPS at the full-performance level (GS-9) and

who are assigned primarily to duties that emphasize the investigation of crimes. Special agents are responsible for conducting/coordinating complex criminal and sensitive internal investigations and conducting/coordinating other specialized law enforcement functions in parks, regions, and service-wide, as well as in assistance to other agencies.

- Jailers are primarily responsible for the care and security of prisoners, transport of prisoners, bailiff functions in court, and other duties pertaining to detention and custody of prisoners. These positions may or may not be commissioned, depending upon the nature of the duties assigned.

Regions employ a cluster of law enforcement executives and specialists. Regional Directors are responsible for implementation and management of the law enforcement program for their regions through park superintendents.

Regional Chief Rangers ensure that law enforcement operational activities are uniformly implemented in compliance with directives, policies and law. He/she is trained and experienced in the supervision of law enforcement programs. This official is thoroughly knowledgeable of directives, laws, standards and practices that govern applicable federal law enforcement programs.

Under the supervision of the Regional Chief Ranger, the Regional Law Enforcement Specialist assists in the coordination and review of the law enforcement program within the region.

The national level law enforcement operation is heavily layered with officers. The key official is the Associate Director, Park Operations and Education. The Associate Director, Park Operations and Education, acting through the Law Enforcement Administrator, WASO-RAD, has functional authority to administer and provide policy oversight of the NPS law enforcement program and develops policies and standards for the Director's review.

Serving (reporting to) the Associate Director are the Chief, Ranger Activities Division, WASO; the Law Enforcement Administrator, Ranger Activities Division; and a National Law Enforcement Specialist. The Chief, Ranger Activities Division, is responsible for several servicewide NPS programs. She/he oversees mission-oriented policy, procedures, standards, and provides oversight to Division-related programs within the Service.

The Law Enforcement Administrator has authority for law enforcement policy oversight, developing national law enforcement policies, directives, procedures, and standards for approval by the Director and implementation by the Regional Directors. The Law Enforcement Administrator oversees the entire NPS law enforcement program. The responsibilities of the Law Enforcement Administrator cannot be re-delegated.

The National Law Enforcement Specialist assists in the development of servicewide law enforcement policies and directives, provides technical expertise and performs other administrative duties related to the NPS law enforcement program.

The officer with ultimate responsibility for policy and policy compliance is the DOI Law Enforcement Administrator. This executive is the designated official in the Office of the Secretary who is responsible for promulgation of policy, procedures, standards, coordination and responsibilities within the Department. He/she also coordinates and monitors implementation of all Departmental law enforcement programs through a standardized inspection program. The Director, Office of Managing Risk and Public Safety (MRPS), is the Departmental Law Enforcement Official. The MRPS will provide advance approval and clearance for candidates selected for bureau or office Law Enforcement Administrators. He/she also serves as the official departmental law enforcement representative when meeting with other departmental level law enforcement representatives. He/she coordinates activities among law enforcement units and monitors the law enforcement programs of each bureau or office for compliance with policies and standards.

The MRPS Law Enforcement and Security Team Leader serves as the Department of the Interior Law Enforcement Administrator.

EVALUATION

The organizational model employed to manage law enforcement has not been brought to full potential. The law enforcement function is not getting the leadership required to meet current and future demands. It lacks a sufficiently powerful champion and organizational/structural position at the national level to exercise the voice it deserves.

Two basic options seem most worthy of consideration at this time:

- ❑ Retain the current organization and manage it more effectively.
- ❑ Reject the current organization in favor of a more traditional stovepipe form.

Cogent arguments can be made for each option. The current structure provides the values of decentralization, which include tailoring of services to local conditions and flexibility of decision-making. The stovepipe organization provides stronger command and control. Decentralization is in keeping with the overall NPS model. A centralized law enforcement model is in place in the Forest Service. Decentralization is the favored model in policing at large, most frequently approached through community policing concepts and strategies.

For a range of reasons, including the current inventory of unmet law enforcement needs, which will be demanding to deal with and will have substantial budget impact,

and the values of conforming to the NPS governing decentralization model, radical modification of the current law enforcement structure is not recommended at this time. The law enforcement function would not be served best by a dislocating organizational restructuring. NPS emphasis should be focused on accomplishing the many changes recommended in this report and in other documents, most notably the Law Enforcement Program Study (1998).

The foregoing position notwithstanding, several conditions have to be met to expect the current organization to be effective:

- ❑ DOI and NPS executives at the highest level must recommit the department to more effective law enforcement.
- ❑ Park Superintendents must be held more accountable for the conditions of law enforcement in their parks – and “condition” includes the professional needs of rangers.
- ❑ Law enforcement requires higher status of WASO.
- ❑ The number of law enforcement staff specialists available at park, regional, FLETC and WASO levels must be expanded substantially.

RECOMMENDATIONS

To strengthen law enforcement organization, the following actions should be taken:

- 1. Create the position of Associate Director for Emergency Services and Law Enforcement.**

This directorate should host fire (structural and wild lands), emergency medical services, search and rescue, and law enforcement (including training). A chief ranger should head the Law Enforcement Division.
- 2. 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.**
- 3. Revisit park superintendent accountability requirements and protocols.**
- 4. Reestablish a system of strict and frequent park law enforcement audits.**
- 5. Consolidate the law enforcement human resources management function under the Associate Director for Emergency Services and Law Enforcement.**

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

SECTION 2: V-RAP: THE NPS STAFFING REQUIREMENTS MODEL

Time-tested staffing and deployment requirements methodologies are available and are commonly used in municipal, county, and state law enforcement settings, at least for the patrol function, which normally accounts for 70% - 80% of total staffing. These methodologies have greatest utility in urban and suburban areas where the service population is concentrated and calls-for-service are heavy and constant. Calls-for-service – based urban and suburban models do not produce satisfactory results when applied in rural settings and special police situations. Alternative approaches, less quantitative and less “objective” in nature, must be employed to define field-staffing requirements for campuses, transportation venues, other “special policy” environments, or for natural resource environments such as parks. These environments pose challenges that are quite different. None of the approaches with which we are familiar reaches the widespread professional use level as the calls-for-service based methodologies.

The NPS has developed a staffing model to systematically examine and calculate law enforcement ranger requirements – the Visitor Management Resource Protection Assessment Program (V-RAP). V-RAP is patterned upon the Natural Resource Management Assessment Program and Cultural Resource Management Assessment Program, a methodology used by natural and cultural resource managers to staff these types of operations. These programs, in turn, use FIREPRO as a methodological foundation. According to an NPS report, FIREPRO is recognized as an interagency standard for developing, testing, and justifying staffing and support needs. V-RAP was developed in the early 1990s. Its first comprehensive application was in 1997. Our task has been to evaluate the design and application of this model.

V-RAP is designed to produce consistent and reliable methods for determining visitor and resource protection staffing and support needs. The core methodology concentrates on identifying the full spectrum of resource and visitor protection tasks that must be undertaken. An important part of V-RAP’s focus is on law enforcement. Its overall reach is broader. A primary purpose is to establish defensible staffing projections for budgeting purposes.

To develop V-RAP, a large panel of rangers and other specialists, numbering almost 100, did the following:

- Defined tasks required to ensure resource and visitor protection. A total of 28 were catalogued.

- ❑ Linked tasks to staffing requirements, using a constant for amount of staff time that a task takes. The personnel type needed for that task was specified.
- ❑ Linked tasks to specific attributes of parks such as number of visitors, number of campers, number of miles of park road. Attributes are termed “park profile.”
- ❑ Developed a profile for each park.
- ❑ Utilized park profiles and staff time requirements to estimate ranger and support staff requirements of 61 parks – a sample.
- ❑ Applied regression analysis methods to develop a best-fit line for each of the 28 functions.
- ❑ Refined the model after review by an expert panel.
- ❑ Tested the model against profiles of larger set of parks (over 200) and refined the model further.
- ❑ Tested (compared) the model against current personnel deployment and “moderated” extreme differences.
- ❑ Employed a final regression equation to smooth extremes and provided an average staffing number for each quantum of profile element. Twenty-eight different staffing equations were developed.

The tasks/functions upon which V-RAP is founded are displayed in Table 18.

EVALUATION

The V-RAP model is viewed as a milestone achievement for the NPS. It reflects technical skill. It was produced with professional integrity. It brings far more structure to ranger staffing decision making than has ever existed. The model still requires validation, most notably the time/staffing multipliers – one of the two core elements of the model. The model is also subject to refinement in other respects. The functional array, the second core component, appears to require expansion. In its present condition, the model underestimates workload scope.

Validation of the work done to date and expansion to include non-protection functions that rangers do, and always will do, are the next steps. The NPS should mount an aggressive program to apply, study, refine, V-RAP concepts, ultimately leading to servicewide use. The work should be done in a way that satisfies standards of independence. OMB personnel and contract consultants should be part of the

Table 18

PROTECTION RANGER FUNCTIONS – V-RAP

- ✓ Beach Patrol
- ✓ Criminal Investigations
- ✓ Drug/Alien Interdiction
- ✓ Overnight Detention Facilities
- ✓ Museum Security
- ✓ Physical Security
- ✓ Visitor Density Management
- ✓ Backcountry Permitting
- ✓ Natural Resource Protection
- ✓ Hunting Trapping Regulation Enforcement
- ✓ Fishing Regulation Enforcement
- ✓ Cultural Resource Protection
- ✓ Alpine Climbing Management
- ✓ Rock Climbing
- ✓ Emergency Medical Services
- ✓ Search and Rescue
- ✓ Swimming Areas
- ✓ Special Use Monitoring
- ✓ Aviation Management
- ✓ Communication Center
- ✓ Clerical Support
- ✓ Protection Supervision

validation team. Independence will promote congressional confidence in results. Within several years, the NPS should be poised to confidently direct every park superintendent to employ the model for law enforcement budgeting, resource allocation, and general management of the law enforcement function. The NPS should employ the data generated by the model to support an initiative to establish minimum staffing standards for law enforcement.

V-RAP. The logic of the V-RAP methodology, the steps in its development, and the inclusion of a broad panel of knowledgeable NPS law enforcement professionals makes a compelling case for likely validation. The panel (76 chief rangers and other park service law enforcement administrators) identified necessary park protection tasks, developed estimates of manpower to complete each from task samples from a wide range and “heavy number” of parks, compared responses, argued, averaged out differences, and developed a final equation. This equation was compared to current practices and further modified. A total of 28 V-RAP factors were identified.

The V-RAP model stands or falls on the validity of the task staffing equation. We applied three tests to this core consideration:

- ❑ Is the task legitimate/required/desirable for park protection?
- ❑ Is the time estimate ascribed to the task reasonable?
- ❑ Were differences in park task requirements considered? Were tasks tailored to park needs?

Analyzed below in some detail are the V-RAP factors that generate the majority of full time equivalent assignments:

- ❑ **Patrol of Primary and Secondary Roads**. For this task, V-RAP uses a sliding formula that considers actual road mileage and amount of visitor use. Separate formulas are used for primary roads and a second more limited equation for secondary roads. The equation provides proportionately more staffing at the low end of mileage and visitor counts, and in an analogy to economies of scale, proportionately less at the higher ends. Example: for a low visitor park with annual visitation of less than 50,000 and less than 10 miles of primary road, the model calls for 1/3 of a ranger. For the upper end, for a park with primary road mileage of over 500 miles and over two million visitors, the model calls for 11 rangers. This figure is per shift. For a park open 24 hours-a-day, it would require three shifts. A shift table is provided. A number of parks are open for only one to two shifts. The figure for secondary roads is about 2/3 of that for primary roads. The underlying estimate is that 50 miles of road can be patrolled in an eight-hour shift. For urban areas this would be a high estimate. For parks this does not seem unreasonable.

- **Backcountry Patrol.** Backcountry patrol is premised on the need for rangers to routinely patrol off-road areas to protect and service hikers as well as to protect resources in the backcountry from poaching and vandalism. Patrols can be foot or mounted. The number of rangers projected is a function of number of hikers, miles of trails within the park, and the acreage of the park. The number of rangers assigned is on a sliding scale, 0.5 rangers per 250 miles of trail, with the number of rangers increasing as volume of hikers increases, with an additional ranger added per 10,000 (hiker) overnight stays. The numbers appear to be supportable.

- **Special Patrol Areas.** The parks have special attraction areas where large crowds gather. In Yellowstone, Old Faithful generates a crowd. The South Rim of the Grand Canyon is another area that experiences high volumes. These areas demand special patrols, side-by-side with normal road patrols. All police agencies assign special beats to attractions and high volume locations. Activities may include traffic direction, crowd control and responding to visitor concerns. For these special locations, V-RAP assigns additional ranger personnel. The numbers of rangers assigned vary from a single ranger for 3 to 5 attractions handling up to 100,000 annual visitors to 5.5 rangers for 3 to 5 attractions addressing annual visitation of over 9,000,000 visitors. For additional special attractions, the number of rangers is slightly increased. Rangers assigned under this formula appear somewhat on the conservative side.

- **Front Country Patrol.** Front country describes areas where day hikes can be taken. This is distinguished from backcountry that has facilities for overnight stays and hikes of far longer duration. Number of park visitors and trails are the variables used. The ranger requirement proposed is modest, the highest requirement being 2.5 rangers for more than 50 trail heads and a visitor load of more than 3,000,000. Again, a sliding scale is used.

- **Open Water Patrol (Lake and Marine).** This function addresses the number of rangers needed for marine or lake patrol (two person patrols). The number of rangers assigned is a function of acres of lakes or marine environment and the annual park visitation. As the number of acres of lake or marine environment increases the number of rangers assigned increases. As the number of visitors increases the number of rangers assigned to marine patrol increase. Numbers of rangers increase from a low of 1.4 rangers for a park with 15-25,000 acres of water and up to 50,000 visitors to 8 rangers for a park with over 200,000 acres of water and over 3,000,000 visitors. Ranger assignments for the marine function appear somewhat conservative. It is important to note that even the largest water oriented park would not have the capability to mount marine patrols 24-hours-a-day.

- ❑ **River Patrol.** Similar to lake patrol, river patrol estimates are based on number of visitors and number of miles of river patrolled. The number of rangers assigned appears consistent with the task. River patrol is based on miles of river patrolled and number of park visitors based on a sliding scale. The lower end of the range provides for 0.5 rangers for 10-20 miles of river and up to 50,000 visitors. The upper limit is 4 rangers for over 60 miles of river with over 3,000,000 visitors.

Other factors used in V-RAP include the following:

- ❑ Beach patrol
- ❑ Criminal investigations
- ❑ Drug interdiction and illegal alien entry
- ❑ Overnight detention facility
- ❑ Physical security
- ❑ Visitor density management
- ❑ Resource protection
- ❑ Natural resource protection
- ❑ Hunting and trapping regulation enforcement
- ❑ Fishing regulation enforcement
- ❑ Cultural resources protection
- ❑ Alpine climbing management
- ❑ Rock climbing
- ❑ Emergency medical services
- ❑ Search and rescue
- ❑ Swimming areas
- ❑ Aviation program
- ❑ Communications center
- ❑ Shift adjustments (24 hour parks)

Obviously not all functions must be performed in all parks. Not all parks have rock or alpine climbing. A staff assignment matrix has been developed for those parks. V-RAP accounts for these variations. Multipliers also account for seasonal variations and differing shifts. For example some parks operate 24 hours a day, with large overnight visitor populations, for these parks additional rangers are proposed based on numbers

of overnight visitors to provide night patrols. Similarly parks immediately adjacent to large metropolitan areas are provided additional rangers for evening and night patrols.

V-RAP as a methodology has borrowed heavily from FIREPRO. On the average V-RAP multipliers appear relatively conservative when compared to methodologies used by police agencies for staffing. One serious weakness in the V-RAP system is that independent experts were not used in its development. Internal instruments developed by those with a vested interest are often considered suspect. A more sophisticated job task analysis of ranger involvement and activities based on time and motion studies conducted in field settings would provide a stronger base for V-RAP tables.

V-RAP Omissions. V-RAP does not include the many non-protection functions that law enforcement rangers do in many parks. These factors and the time they consume should be recorded to get a truer picture of ranger staffing requirements. In a number of parks surveyed rangers were involved in fee collection. In others, rangers routinely maintain marine engines and boats. Rangers often lead tours or give interpretations. Where such duties are routinely assigned they must be factored into V-RAP personnel equations.

V-RAP does not completely address ranger safety. All rangers should have immediate access to radio communications. All should have access to reasonable backup. A special staff multiplier is needed to ensure that a backup is available. These factors should be built into V-RAP. V-RAP needs to build in a 29th factor – officer backup. Additional rangers would not be needed for backup when backup is available from other nearby law enforcement agencies. Waking sleeping rangers, having them dress, and then respond is not considered effective backup. Further, the backup equation must accommodate the reality that consideration will inhibit backup opportunities in certain circumstances. In these situations, prudent officer safety behavior must be emphasized.

While emergency medical services are factored into V-RAP, fire duties are not. In a number of parks protection rangers form the core of the firefighting effort. Fire related duties take time, for training, for equipment maintenance, as well as for responding to fires. Fire training, equipment maintenance, and preparation becomes especially time consuming when a ranger is responsible for both wild land and structural firefighting. In those parks where protection rangers are responsible for firefighting these duties must also be added to the V-RAP profile.

Finally, it is interesting to note that while crime figures are factored into task 8, the investigation time needed, they are not used as a factor in developing patrol needs. We recommend that the density of patrol be increased as a function of the reported crime rates in a park. It makes sense to increase patrol in parks that experience crime frequently.

V-RAP is a valuable management tool for reviewing the protection function at each park. We recommend that V-RAP be established as the minimum standard for

assigning personnel for the protection function. We also recommend that a process be developed to permit adaptation for specific parks. Deviations from this standard should be justified in writing to the Regional Protection Ranger who could approve an exemption or a change in ranger allotments where justified. Any general tool, as V-RAP, will neglect certain park idiosyncrasies that will require additional or fewer rangers.

RECOMMENDATIONS

To establish and institutionalize a reliable staffing requirements and deployment model, the following actions should be taken:

1. **Refine and validate the 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/organization that meets criteria of independence.

2. **Establish minimum standards for the law enforcement staffing in each park/unit, using validated V-RAP projections.**

Staffing may be approached in a variety of ways, including contracting, mutual aid, and permanent staffing.

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

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

SECTION 3: STAFFING AND RESOURCE LEVERAGING

In 1999, the NPS basic law enforcement staff consisted of 1,587 permanent commissioned rangers and 571 seasonal rangers, a total of 2,158. Totals fluctuate from year to year, often measurably. Fluctuation is believed to be attributable to resource availability, to competing priorities, OMB decision-making, and, surely, to absence of a coherent law enforcement staffing strategy.

The Law Enforcement Programs Study, a March 2000 submission, informs the United States Congress of the need for 1,295 additional positions for NPS protection: 615 law enforcement rangers; 219 resource protection rangers; 154 visitor management personnel; and 207 support/overhead personnel – an increase of 60% over the current complement of permanent and seasonal rangers. Excluding the support to personnel, the increase would be 46%. The augmentation total emerged from application of the V-

RAP model. The needs are labeled “staffing shortfalls,” in the Law Enforcement Program Study (1998).

A series of benefits are expected from augmentation. The NPS believes that fully staffing the permanent protection ranger workforce would accomplish the following:

- ❑ Put the ratio of preventive resource protection to life/safety policing back in an acceptable balance – eliminate the *triage* situation where life/safety responses trump resource protection
- ❑ Provide a strategically planned system-wide and pre-emptive (not reactive) approach to natural and cultural resource protection that is thoughtfully linked to the educational efforts of NPS interpreters, resource management specialists and scientists
- ❑ Meet NPS performance goals for resource protection per GPRA
- ❑ Provide the opportunity to recruit new additions to the workforce that reflect the diversity of the visiting public
- ❑ Meet broad workforce professionalization directives of Title I of the National Parks Omnibus Management Act of 1998 by allowing protection employees time through adequate staffing to master skills and continue education in the resources they protect

Failure to meet the staffing goals would have damaging consequences and adverse impacts in the view of the NPS:

- ❑ Continued loss of NPS natural and cultural resources through criminal activity motivated by the spiraling market values of those resources which become increasingly scarce and valuable over time
- ❑ Late discovery that erosion of park resources is irreversible
- ❑ Increasingly poor service to the public because rangers are forced to ignore less urgent requests for assistance in favor of life and death emergencies and felony responses
- ❑ Increased safety risks for law enforcement and the public when backup is needed, but not readily available
- ❑ High turnover in the workforce, less professionalism, and corporate memory as employee burn out
- ❑ Loss of opportunity to attract and retain the brightest recruits as the perception of park ranger work conditions diminishes

The estimated recurring (annual) cost of this augmentation is \$68,000,000. The NPS outlines additional needs in the Program Study, all with cost impacts, several quite sizable.

EVALUATION

For reasons of unacceptable risk to rangers, erosion of proactive law enforcement capacity to safeguard natural resources, and visitor and land acquisition trends that only promise to aggravate the foregoing conditions, and the validity of views on risks of not increasing ranger staffing, we recommend an aggressive program of staff augmentation and resource leveraging initiatives. We do not disagree with the findings of the V-RAP exercise, which calls for over 1,200 additional positions, our call for validation of the protocol notwithstanding. We are not in a position to comment on the accuracy of the overhead/support estimates or, for that matter, the resource protection ranger goals. We did not study these functions. We do believe that the goal of 615 law enforcement rangers is reasonable. This would represent an increase of 28%.

The addition of 615 rangers, properly distributed and managed, should have a profoundly positive impact on NPS law enforcement capacity and safety. This number, roughly equivalent to the current seasonal complement, should enable the NPS to minimize employment of seasonals which, while economically beneficial, is a very mixed blessing, with many downsides from professional and corporate management standpoints, including training, experience, and turnover. Seasonals work an average of four months per year. Replacement with an equivalent number of full-time rangers would almost triple the capacity now supplied by seasonals. The need for some level of supplementary manpower from seasonals will always be present. In this regard we endorse an NPS desire to reclassify seasonal positions to “permanent – subject to furlough.”

Should recommended or other staffing augmentations eventuate, the NPS is obligated to allocate new rangers to conform to the dictates of a defensible deployment scheme. The V-RAP methodology, once revised, should be of great assistance in formulating a strategy. Decisions must be made concerning configuration of the 615 positions – rangers, supervisors, and specialists.

Resource Leveraging. Service demands that exceed or potentially will exceed capacity can be met in several ways:

- Increases in staff
- Introduction and enhanced use of productivity strategies
- A combination of the foregoing

Reliance on staffing increases alone is rarely defensible.

Productivity options are measures that preclude the need to hire staff (minimize staffing augmentation requirements) and enhance the quantity or quality of service delivered by staff that is in place (existing and new). We found little attention being paid to law enforcement productivity strategies within the NPS, except for equipment considerations.

Productivity opportunities that may be available to NPS units center on the following areas:

- ❑ **Workload Reduction.** The workforce surveys asked both rangers and park superintendents whether rangers perform any law enforcement or other activities that are perceived to be of questionable value. Rangers feel there are many. Superintendents feel there are few. About one-third of respondents commented on collateral duties, indicating, in various ways, that they are over-emphasized at the expense of law enforcement duties. Collateral duties mentioned most frequently were fee collection; visitor center duties; interpretation; transportation assignments. An additional 28% of rangers answered “no” – they perform no duties that are of questionable value. Over 90% of superintendents offered no comment on the question.
- ❑ **Technology.** Transit systems parallel parks in that they have configurations that challenge deployment standards and are difficult and expensive to police cost effectively. Transit systems have achieved great success in monitoring dispersed facilities and low-density venues with CCTV. CCTV could be employed at strategic locations in parks. A number of parks that were visited employ portable sensing equipment, especially in backcountry areas. Intensified use of these devices, with or without signage, seems to hold great potential for expanded use.
- ❑ **Contracting.** While most units have mutual aid agreements for emergency situations and dispatching, we found few that have explored arrangements with adjacent/local police agencies for proactive patrols, follow-up investigations, or prisoner transportation, to cite several possibilities. Contracting has proven to be anything but simple for jurisdictions across the country, but still is worth examining.
- ❑ **Cross Training.** We found very few directed efforts to leverage presence of many additional staff members and workers in park settings to assist with crime prevention and monitoring tasks. Fee collectors, maintenance workers, and natural resource professionals should be viewed as law enforcement team members, just as law enforcement rangers are viewed as resources for other park activities.

- ❑ **Crime Prevention/Problem Solving.** We have no evidence that NPS rangers, their supervisors, or park superintendents are routinely employing problem solving techniques, which have become a staple in municipal, county, and state police agencies. We have anecdotal evidence of problems that are subject to this approach and possible solutions. Concessionaire crime is one. Border parks have opportunities to employ problem-solving techniques successfully.
- ❑ **Training.** Training, delivered in quantity and quality, is a proven correlate of productivity. A subsequent analysis will posit that NPS training practices are mixed. Basic is strong. Field training is non-existent. In-service requires strengthening, especially in safety-related concentrations such as officer survival and defensive tactics.
- ❑ **Morale and Motivation.** The ranger culture is embroidered with numerous disincentives. Rangers are frustrated with what appears to be inaction over, to them, core considerations: C-6 retirements; Ranger Careers; backlogged background investigations (seasonals); and an array of leadership issues. The uncountable number of hours of attention and discussion invested in these issues erodes productive capacity.

Clearly defined objectives, discussed below, are crucial to maximized productivity. Additional productivity enhancing possibilities are itemized in Chapter V, "Workforce Perspectives."

- ❑ **CPTED Applications** Redesign of access and egress and limitation to a few main entries can ease crime control in parks. Design of facilities within parks to limit opportunities for crimes of stealth should be considered. Visitor and camping areas should be constructed following the principles of Crime Prevention Through Environmental Design (CPTED).
- ❑ **Concession Accountability** In a number of parks a surprising proportion of incidents and investigations involve concession staff. These incidents, investigations and arrests consume ranger time. Establishing minimum standards and backgrounds for concession hires could reduce workload for rangers.
- ❑ **Injury and Accident Reduction** New rangers have not dealt with a number of infrequent situations. Lack of experience leads to complacency and lack of preparedness. The result is often an avoidable injury. Field training to deal with these infrequent incidents could substantially reduce the potential for injury and accident due to lack of preparation.
- ❑ **Problem Solving** Municipal police have realized important economies through the use of problem solving methodologies. Rangers trained in

problem solving would learn to address the underlying causes of incidents and look to some mechanism to address factors triggering incidents. Addressing underlying causes would reduce overall incident rates.

- **Equipment Shortfalls** Replacement of currently defective alarm systems could substantially reduce ranger call outs. Use of mobile detection devices and remote cameras could replace routine ranger patrols. In a few parks simply upgrading ranger vehicles would decrease the downtime rangers experience with frequent vehicle malfunctions.

RECOMMENDATIONS

To restore proactive law enforcement capacity and enhance ranger safety, the following actions should be taken:

1. **Increase the current complement of rangers by 615, the number of law enforcement rangers determined to be needed by the V-RAP process, and reported to Congress.**
2. **Develop a plan that justifies allocation and scheduling of new rangers.**

The plan and subsequent deployment criteria should be developed and made at central (WASO) and regional levels. We don't believe that the current park-based "bidding/budget type" process will maximize the value-added potential of the incoming ranger force. Use of V-RAP factors, supplemented by crime and visitation incidence, and projections should be helpful.

3. **Multiply the value of current and future rangers by introducing productivity enhancement initiatives, park-by-park, and service-wide.**
4. **Develop a law enforcement cost center.**

With a separate law enforcement cost center, costs for actual law enforcement duties will be able to be separated out from fire, search and rescue and emergency medical. Other collateral duties should also be separated and costs assessed. This will permit a clearer view of law enforcement costs.

SECTION 4: GOALS AND OBJECTIVES

The most current and comprehensive structure of NPS goals is documented in the National Park Service Strategic Plan (Draft, 5-15-2000). This plan, the second of its kind, complies with the Government Performance and Results Act of 1993 (GPRA). It "Sets goals that are measurable results directly supporting the NPS mission." The NPS has created four "Mission Goal Categories":

- ❑ Park Resources
- ❑ Park Visitors
- ❑ External Partnership Programs
- ❑ Organizational Effectiveness

The plan states that “Every NPS Park and program has its own strategic plan and annual performance plan which tier from the Statewide plans and the goals found in this strategic plan. Parks and programs have some flexibility to add park-specific goals to better align with their own mission.” Within Mission Goal categories are three kinds of Servicewide goals:

- ❑ Mission Goals that continue indefinitely
- ❑ Long-term Goals that generally last five years
- ❑ Annual Goals of only one-year duration

Servicewide goals are stated as measurable outcomes (results), embedding performance measures into long-term goals to show relationships to annual goals. The plan sets forth an elaborate matrix that links NPS Mission and Long-Term goals to DOI goals. The governing Mission Goals are as follows:

- ❑ **Preserve Park Resources** – Natural and cultural resources and associated values are protected, restored, and maintained in good condition and managed with their broader ecosystem and cultural content.
- ❑ **Provide for the Public Enjoyment and Visitor Experience of Parks** – Visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of park facilities, services and appropriate recreational opportunities.
- ❑ **Strengthen and Preserve Natural and Cultural Resources and Enhance Recreational Opportunities Managed by Partners** – Natural and cultural resources are conserved through formal partnership programs.
- ❑ **Enhance Organizational Effectiveness** – The National Park Service uses current management practices, systems, and technologies to accomplish its mission.

The long-term goals established for the Organizational Effectiveness portion of the Mission Goals (to be achieved by 9-30-2005) exemplify the nature of Long-Term Goals throughout the Plan. (See Table 19.)

Table 19

LONG-TERM ORGANIZATIONAL EFFECTIVENESS GOALS

- Data-Systems:** 66% of major NPS data systems are integrated/interfaced.
- Workforce Stewardship:** 75% of NPS employees are satisfied with their job; 75% of employees believe the organization is functioning effectively.
- Workforce Development Performance:** 100% of employee performance agreements are linked to appropriate strategic and annual performance goals and position competencies.
- Workforce Diversity:** Increase the service wide representation of under-represented groups.
- Employee Housing:** 50% of employee house units listed in poor or fair condition in 1997 assessments are rehabilitated to good condition, replaced, or removed.
- Employee Safety:** The NPS employee lost time injury rate will be at or below 4.49 per 200,000 labor hours worked.
- Line-Item Construction:** 100% of line-item projects . . . meet 90% of cost, schedule, and construction parameters.
- Land Acquisition:** The average time between the appropriation and offer of just compensation is 171 days . . .
- Environmental Leadership:** 100% of NPS units will undergo an environmental audit to determine baseline performance. . .

EVALUATION

Law enforcement/protection objectives must define the ultimate ends or outcomes that rangers must strive to achieve. Objectives allow management functions to be directed toward their achievement. They are the prerequisite to managing by objectives. Law enforcement objectives should exist for the NPS as a whole, and be set forth in the strategic plan, and exist for each park.

Objectives must be set for NPS rangers also. Logical relationships (“tiers,” in the NPS strategic plan structure) must exist among levels of objectives. Objectives must be defined with sufficient precision to yield valid measurement. This requires that they be written. It is essential to measure the degree to which objectives are achieved (effectiveness) and the cost incurred to achieve them (productivity). Without valid effectiveness and productivity information, it is difficult to assess the performance of a law enforcement agency insightfully or to conduct many aspects of the management process rationally and successfully, including resource allocation. The NPS falls well short of meeting the foregoing requirements.

Evidence is ample that the NPS is in command of the principles and mechanics of objectives setting and measurement. The most recent Strategic Plan is outstanding in construction. It evidences careful thought and craftsmanship. Disappointingly, however, neither this document nor most others we have read directly addresses law enforcement objectives. We find this compelling in drawing impressions about the secondary status of law enforcement in the NPS. Further, two out of three park superintendents have not chosen, perhaps not had time or resources, to fashion law enforcement objectives. This inaction may also be attributable to absence of perceived need. Park superintendents are very secure in their own understanding of law enforcement objectives, as are a large majority of rangers. Simultaneously, a large number of rangers are not secure, 43%, which factors out to 682 permanent rangers. Almost 700 point-of-contact rangers are not clear on the outcomes they are to pursue. This is not acceptable.

RECOMMENDATIONS

The following actions should be taken to strengthen law enforcement objectives setting and measurement practices:

1. 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.

2. Ensure that objectives are set by groups that include all ranger ranks.

3. Ensure that the objectives are sanctioned by appropriate executives.

4. Ensure that objectives are documented and distributed to all personnel.

5. Develop one or more measures of achievement for each objective.

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

A monthly/quarterly progress reporting system is advisable.

7. Ensure that law enforcement objectives are reflected in the NPS strategic plan.

8. Objective compliance should be one component of a restored operations evaluation process.

SECTION 5: TRAINING

The National Park Service conducts a broad range of training. Oversight of all National Park Service training is assigned to a Chief, Training and Development. This officer is sited at the Horace M. Albright Training Center at the Grand Canyon. Training is focused in 16 career fields. Law enforcement and resource protection is the primary field for protection rangers. Training is delivered at seven centers. Centers specialize in specific subject areas. The most relevant center for protection rangers is located at FLETC (Federal Law Enforcement Training Center) in Brunswick, Georgia. Rangers receive emergency medical and firefighting training at other centers.

The ranger training staff is headed by a superintendent. He is assisted by a Manager for Law Enforcement and Resource Protection. An administrative officer, a clerk and four trainers also staff the FLETC Law Enforcement and Resource Protection Office. The four trainers are rangers on assignment. Two of the trainers specialize in firearms instruction, one in behavioral training and the fourth in defensive tactics and physical skills. A legal instructor works with this group. He is a former park service employee who now works for FLETC. Case Incident Reporting Manager, whose primary responsibility is to oversee the Park Service crime records works closely with the ranger training staff. This manager works for Ranger Activities and is simply sited with training, as is a park service employee development specialist.

The Ranger Role. The ranger is a generalist. In addition to law enforcement, the protection function requires companion skills – emergency medical; firefighting (wild lands and structural); search and rescue; and specialty equipment operation, vessels. Rangers require resource knowledge and incident command capabilities. This protection role has important implications for training. The many and varied skills that must be mastered require a lengthy basic training. Frequent in-service/update training is required to maintain currency and certification in a very broad range of specialties.

Growing demand for law enforcement services is generating pressures on rangers to specialize in law enforcement. Except in the largest units, specialization will not prevail. It is too expensive to establish parallel units for law enforcement, medical response, structural fire, wild-land fire, and search and rescue. For economy purposes, the multifunctional, multifaceted ranger will continue to exist.

Basic Training – Permanent Rangers. Basic training for permanent protection rangers is provided at FLETC. The NPS pays all costs. The rangers/students are salaried. Protection rangers must attend FLETC within two years of appointment to a permanent position. Most trainees have previous law enforcement experience as a temporary protection ranger. In the class interviewed at FLETC, only two students had not served previously as a temporary protection ranger. Many have previous basic law enforcement training with local police agencies.

The curriculum for the basic course, "Land Management Training Program," was developed in 1977 to serve Park Service, Fish and Wildlife, Bureau of Land Management, U.S. Forest Service, and Tennessee Valley Authority rangers and officers. The course has been updated in 1982, 1986, 1988, 1990, and 1993. The core basic course consists of 479 hours of instruction, administration, and testing, requiring 58 days for coverage. The NPS adds 56 hours on items specific to the park service.

While curriculum is common, NPS rangers normally attend the basic only with other NPS rangers. Curriculum is taught by NPS instructors and full-time FLETC instructors. During fiscal year 1999, three Land Management basic courses were offered. Total enrollment was 46.

The larger proportion of Training Center effort involves setting up, administering, and conducting the basic class for protection rangers. It takes up to two years lead-time to set up a course at FLETC. Competing with other federal agencies for classroom and dormitory space, NPS must alert FLETC well in advance of estimated numbers of trainees. Budgets are set one year previous and information needs to be provided well before the federal budget submission dates. This has obvious implications for adding staff to NPS. Extensive planning and lead-time will be needed.

Basic Training – Temporary Rangers. Seasonal work is the traditional route to a full-time appointment. Completing a NPS-approved basic law enforcement course is a prerequisite for service as a seasonal ranger. Prospective seasonals must secure this training on their own and pay their own tuition and expenses. Course completion does not guarantee employment.

The seasonal course is offered at twelve colleges and community colleges. A number of these offer degrees in resource management and have strong forestry or environmental programs. The seasonal basic training curriculum has been developed by federal trainers. The Park Service Law Enforcement Training Center staff periodically monitor the seasonal basic program for curriculum compliance. The NPS specifies lecture requirements and learning objectives.

Currently, 258 hours of training are required to meet NPS standards. There are plans to increase the minimum to 300 hours. Providers must comply with a basic training plan. Some of the colleges add coursework extending the hours to as much as 500 hours. Context in which this basic course is offered varies. In some settings this basic class is part of a four-year curriculum for Environmental Protection. Table 20 profiles curriculum content.

Curriculum	Total Hours	Classroom	Practicum	Laboratory
<input type="checkbox"/> Legal	58 hours	52 hours	6 hours	--
<input type="checkbox"/> Behavioral	22 hours	9 hours	13 hours	--
<input type="checkbox"/> Enforcement Techniques	74 hours	38 hours	34 hours	2 hours
<input type="checkbox"/> Enforcement Operations	30 hours	13 hours	12 hours	5 hours
<input type="checkbox"/> Law Enforcement Skills	88 hours	25 hours	21 hours	42 hours
<input type="checkbox"/> NPS Specifics	13 hours	9 hours	--	4 hours

Commissions. Upon completing the FLETC basic, permanent rangers receive a Type 1 commission. Upon completing the seasonal basic, and being hired, seasonals receive a Type 2 commission. The Type 2 commission is not authorized to serve warrants and to conduct major investigations. In practice, seasonal rangers perform the same duties as permanent rangers. Permanent and seasonal rangers work side-by-side and replace each other on shifts. Warrant service and serious felony investigations are not common ranger duties and in the larger parks are conducted by criminal investigators.

Field Training. Law enforcement retains aspects of a craft. A ranger can gain knowledge of the law and law enforcement techniques in a classroom. Knowledge must be reinforced by practice. In the police profession, practice, along with further instruction, occurs during field training. Working under the supervision of a number of experienced and specially trained officers, a new recruit is trained in a range of field situations, graded daily, counseled, and placed in remedial training, if necessary. The National Park Service does not have a formal field-training program for new rangers. A number of parks provide occasional field training, informally. Most do not.

In-Service Training - Refresher. By policy, protection rangers are obligated to undergo 40 hours of law enforcement refresher training each year. The composition of the 40 hours is only loosely defined in 446 DM. It states that the 40 hours should include a legal update, a policy update, and no more than 8 hours of firearms training. Rangers are also responsible for emergency medical and fire refreshers. Responsibility for administration and control of refresher training is not centralized in the NPS. Each ranger is responsible for ensuring that training is received. Each park is responsible for scheduling, processing, and other associated administrative duties. Records of refresher training are kept at individual parks, in ranger personnel files.

Assessment of the volume, content, and quality of refresher training is not achievable at this moment. Record keeping is localized at the park level. Training records are kept in

the files of the individual ranger's. Lesson plans are not maintained. Formal attendance lists and backup materials are not kept in designated locations. While policy specifies the need for 40 hours of refresher training, there is no mechanism to ensure that this is accomplished. There is no accountability system in place to ensure the integrity or completion of refresher training. Regional law enforcement coordinators are responsible for ensuring that refresher training occurs.

Complying with the refresher mandate is difficult for many parks and rangers. Frequency of offerings, distance to the location where training is offered, and field coverage requirements limit opportunity to attend courses. Realizing the difficulties that local parks are having, the Park Service training staff at FLETC has attempted to assist by offering appropriate refresher training courses regionally. FLETC has also conducted train-the-trainer courses to increase faculty availability for regional offerings.

Smaller parks encounter particular difficulty with refreshers. Non-standard approaches are being created to meet the mandate. Parks put on refreshers for several area parks. Rangers enroll in training at local police sites. Simply sitting down with a superintendent and discussing law enforcement and park issues is considered refresher training in some parks.

In-Service Training – Advanced. In 1999, Park Service instructors trained 2,188 rangers and conducted 101 training events, logging a total of 11,024 training days: 2,670 basic training days; 8,354 in-service days. Comparison figures for 1997 were 1,556 trainees, 68 training events and 9,654 training days. Advanced classes are available to permanent rangers only. Current advanced offerings are displayed in Table 21.

Table 21		
RANGER ADVANCED IN-SERVICE CLASSES		
Course	Hours	Location
➤ Archaeological Resource Protection	40	Parks/Training Centers
➤ Resource Law Enforcement	80	FLETC
➤ Non-Lethal Control Instructor	64	FLETC
➤ Law Enforcement for Managers	40	FLETC
➤ Criminal Investigators Conference	40	FLETC
➤ Basic Peer Support Training	24	Parks/Training Centers
➤ Firearms Instructor	80	FLETC
➤ Firearms Instructor Refresher	40	FLETC
➤ Physical Fitness Coordinator Training	80	FLETC
➤ Special Operations Training	80	Organ Pipe Cactus National Monument
➤ Criminal Investigator	328	FLETC
➤ Advanced Interviewing	40	FLETC
➤ National Wildfire Investigation	40	FLETC
➤ Technical Investigative Equipment	80	FLETC
➤ Small Craft Enforcement Training	80	FLETC
➤ Impact Weapons Instructor	36	FLETC
➤ Advanced Physical Security	64	FLETC

Of the 101 courses offered in 1999, 25 were instructor-training courses. Instructor training has been focused upon the high demand law enforcement skills areas such as firearms, defensive tactics, physical fitness, and driving. Of 101 deliveries in 1999, 63, 62%, were delivered at field locations – at sites other than FLETC.

NPS staff and officers from other agencies attend NPS in-service classes. Seven of the 101 courses conducted in 1999 had either non-law enforcement or other agency participation. To assist with local refresher training FLETC provides federal legal updates that can be used as a training aid and curriculum for a proportion of refresher training.

EVALUATION

The NPS training function has several strengths. Assets include a strong basic program, a solid, but limited advanced in-service program, and a knowledgeable and industrious management. The most glaring deficiency is total absence of field training. Refresher training practices fall short of professional requirements. We are not convinced that seasonals are receiving sufficient preparation.

Field Training. The NPS does not comply with professional law enforcement standards in this area. Classroom training, lectures, labs, and practicum are essential. Equally essential is field application of the theory under the tutelage of experienced officers, trained to reinforce and supplement basic/classroom training. Without field training, new recruits take longer to become productive and accomplished, develop bad habits, and often founder. Liability potential increases.

A field training program must be instituted. Responsibility for field training should be assigned to FLETC. This will necessitate additional staff and support resources. One of the popular formats used today, such as the San Jose Model, should be employed. Field training should be conducted in parks where there is sufficient and varied interaction to provide new rangers with the gamut of situations they are likely to encounter. Field training will be difficult to provide for seasonal recruits. With seasons often short, the standard field training would deny a park full use of the seasonal for the entire year. Reducing the length of field training is not recommended. This difficulty represents one more shortcoming of the seasonal concept.

Refresher Training. The 40-hour yearly requirement for law enforcement refresher for both seasonal and permanent is consistent with best law enforcement practices and a goal worthy of positive acknowledgement. Record-keeping shortfalls preclude data-supported evaluation of how well or poorly refresher training goals are being achieved. Anecdotal evidence suggests that achievement is uneven, at best. Availability considerations – frequency and location of offerings, and park coverage considerations inhibit attendance opportunities.

Ranger development and effectiveness and liability exposure demand that NPS managers get a firm grasp on the condition of refresher training. Establishing a reliable refresher training database is an immediate priority. Without a dependable central or regional registry of refresher training and training audits, questions of compliance with policy can never be answered persuasively. Concern exists because rangers report a number of local parks that fail to comply with existing policies.

The Park Service Law Enforcement Training Center at FLETC should document training. Names of rangers trained, names of instructors, times that training occurs, and testing scores are basic data requirement. Training reports should be accompanied by signed statements by superintendents and chief rangers attesting to accuracy of reports. The training office should conduct on-scene and follow-up audits to ensure accuracy of reports and compliance with policy.

There will always be need to tailor refresher training to needs in individual parks – both the park's and individual rangers'. Standard, agency-wide refresher training also makes good sense for the NPS, whose rangers move from park to park. Common training and proficiencies among rangers brings managerial and operating flexibility and benefits. The Park Service training office should prepare service-wide refresher training curricula and training guides, annually. A short sequence should be left for park specific training. All training should have testing associated with it. Every trainer should be credentialed/certified to delivery the training.

Advanced In-Service. Overall, advanced training is sound. A wide range of specialty training is available. One additional area of training that would be of great assistance is management and leadership. Chief and district rangers should have more course work on coordinating and working with outside law enforcement agencies, developing cooperative agreements, and working more productively with other park departments and park constituencies. Maintaining records, accountability, incident command in managing fire, emergency medical, and search and rescue would assist in their protection function leadership capacity. Training for individuals in these positions should occur within six months of assuming positions. For protection rangers, we would like to see a more active presence in fire, search and rescue, and emergency medical service training.

Two advanced in-service trainings should receive priority. Special Event Team Training should be coordinated at the national level by FLETC NPS training staff. Field skills refresher training should also be offered on a routine basis by FLETC staff to provide to rangers in the field experience in dealing with critical incidents that they don't often encounter.

The National Training Office for Law Enforcement should be more active in coordinating emergency training. We also recommend a closer working relationship between law enforcement training and these specialties. An overall plan for integrating these specialties with the law enforcement function is needed.

Seasonal Ranger Training. Seasonal ranger training practices raise a wide range of serious concerns:

- ❑ Seasonal rangers receive slightly more than half the training of permanent rangers. Yet, seasonal rangers basically do the same job as permanent rangers.
- ❑ Quality of the seasonal basic training, administered by twelve different institutions, is believed (by rangers) to be quite uneven.
- ❑ It will be difficult to implement field training for seasonal rangers.
- ❑ Seasonal rangers spend almost one-third of their duty time in refresher training each season. In mountain parks, seasonal rangers spend most of the early season simply meeting mandated training in law enforcement, firefighting, and emergency medical.

If the NPS is intent on continuing to rely on seasonals as a resource pool, new and substantial investments in their training are clearly in order. In view of current conditions and trends, and predictable changes, it is not advisable to put any ranger in the field who performs the same work as a permanent ranger with less training than the permanent.

RECOMMENDATIONS

To strengthen NPS training, the following actions should be taken:

1. Establish a Field Training Officer Program.

This program should enhance and expand basic training and be administered by the FLETC training group.

2. 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.

3. Centralize responsibility for refresher training at the Park Service National Training Center at FLETC.

Lesson plans should be developed and distributed. Local trainers, following national guidelines, should conduct refresher training. The national office should maintain records on all refresher training.

4. Audit refresher training to ensure that national standards are met.

5. **Intensify the level of management and leadership training accorded to chief and supervising rangers.**
6. **Develop closer coordination between Law Enforcement Training and Fire Training to ensure a close working relationship between the two emergency-based disciplines.**
7. **Create a comprehensive and reliable training records database at a central location.**

SECTION 6: EMERGENCY COMMUNICATIONS

Communications is a lifeline for law enforcement officers. When confronting uncertain or dangerous situations, the radio permits rangers to request assistance. The radio, telephone, and mobile computer enable law enforcement officers to gain information prior to approaching a subject. Access to quality communications is a major safety issue.

The overall parameters of communications deployment throughout the National Park Service are not known at this time. A recent NPS-sanctioned survey provides some important data, but it is acknowledged that the vast majority of parks simply didn't reply to the questionnaire. This situation reinforces comments made elsewhere in this report concerning need for basic management information and greater accountability of local administrators.

Governing Authority. No organizational locus of authority and responsibility for emergency communications exists in the NPS. Neither Director's Order #9 nor RM-9 treats communications policies and procedures comprehensively. Chapter 2, Section 2-2, Computerized Information Systems, endorses use of criminal justice information systems and sets forth rules and regulations for proper use of NCIC information.

Communications Services Arrangements. Variations in availability and structure of emergency communications are extreme. A number of parks operate their own park communications system. A NPS survey conducted during 2000 revealed the following:

- A large number of parks have dispatch handled by another agency. The survey found that 50 parks (38% of those responding) used this arrangement. At Castillo San Marco, for example, the local sheriff's office provides communications to protection rangers. Sheriffs are the most common providers under these arrangements. Arrangements exist, also, with the Forest Service and the Bureau of Land Management.
- 48 of 133 responding parks (36%) operate their own communications system. Systems vary from 24-hour-a-day operations (Yellowstone) to

radio systems in use during the day shift only. In some parks the communications “center” is a secretary in an administrative office with a small base station (Canaveral National Seashore).

- A less frequent but still prevalent arrangement features park-based dispatch during active hours and local agency service during late evening hours. Grand Teton, one example, operates its own dispatch 16 hours a day with night operations being handled by the local sheriff’s office. Parks being covered partially by other agencies numbered 32 in the survey (24% of those responding).
- A number of parks, especially those located in close proximity, share communications service. The Everglades, for example, provides dispatch services to Biscayne and Big Cypress. Eighteen parks (14% of those reporting) report this arrangement.
- Some parks have no dispatch capabilities at all. Six of 133 survey respondents (5%) are in this category.
- Joint operations are emerging among Interior agencies. A joint operation between the Forest and Park Services is being implemented in the Tetons. Joshua Tree is a partner in a dispatch center that serves BLM, Forest and Park Service.

Parks that purchase dispatch services from other agencies report costs that range from \$250 to \$65,000. Most costs are modest, considering that the average law enforcement agency cost for a one-position communications center (24/365) is \$350,000. To build staff and maintain a full-time dispatch center is beyond the resources of most parks.

Equipment and Practices. Ranger vehicles are radio equipped. Rangers carry portables when not in vehicles. The NPS is not able to supply comprehensive and reliable servicewide information on number, age, and serviceability of either car radios or portables.

Communications equipment tends to be older, some bordering on obsolete. Congress has mandated a move to narrow band digital. There has been little movement in this direction to date. Knowing that a change is on the horizon, managers have been hesitant to invest in upgrades and fixes to present communication equipment.

Radio coverage is problematic in a number of parks. Receiving radio signals in mountainous and wooded terrain can be difficult. Dead spots are not uncommon. Almost all parks share their radio frequencies with other park operations. In fact, no park visited had a dedicated law enforcement frequency. There may be a few parks with dedicated protection channels.

Rangers frequently complain of difficulty gaining airtime. In parks such as the Everglades, where dispatch facilities are strained, this is a serious problem. At Everglades dispatch protection rangers compete with airplanes, field researchers, maintenance operations, and two other parks for the attention of the usual single dispatcher.

EVALUATION

Like many of the NPS law enforcement functions, systems, and practices we have reviewed, communications assets, problems, and needs are difficult to capture comprehensively and coherently. Information we do have and observations we have made reveal more needs than assets. Communications practices of the NPS meet only the most minimum professional standards. Shortfalls are easy to catalog. Rangers are often out of contact because of dead-spot situations. Rangers compete for airtime on shared frequency, which also precludes security of communications much of the time. Equipment is not what it should be. The willingness of local law enforcement agencies to support park law enforcement operations gives an enormous boost to the NPS communications capacity but is not dependable or sustainable.

The current situation, which is commonly acknowledged throughout the Park Service, is easily explainable. It is rooted in a decentralization effort that left much undone and in fragmented authority and responsibility. No one officer, or office, seems to be in charge of communications. And for the same reason, not enough seems to be occurring to remedy the current situation. The most important step to take at this junction to address communications needs is to create an office of technology. Once accomplished, attention has to be devoted to needs assessment, an emergency communications master improvement plan, access considerations, criminal justice databases, standards for dispatchers, and emergency dispatch structural arrangements. Movement toward regional dispatch centers is a promising innovation to drive an entire agenda of change.

The NPS must inventory its communications capacity. It must conduct an assessment that reveals, for every park in the system, assets, liabilities, and needs. Results should be compiled in the regions and forwarded to WASO.

Needs assessment information should form the backdrop for development of a communications improvement master plan. This plan must be paired with a national plan to migrate to narrow band digital as mandated by Congress. This plan should specify implementation costs.

In the interim the Park Service must ensure that every ranger has access to communications and access to crime information systems.

The Park Service should establish, by policy, that every protection ranger has immediate communications access. In some parks, radio communications will always suffer dead spots. However, a great deal more can be done than is being done now to

ensure adequate radio coverage. Each park should be required to study and act to improve park radio coverage for protection rangers. In those areas where reasonable coverage is difficult or impossible to achieve through conventional radio, alternative technology such as satellite relay should be provided.

All protection rangers must have immediate access to law enforcement databases such as NCIC and their local state information systems. These systems supply information on vehicles and suspects that rangers may be approaching. This is a safety issue. Protection rangers should have direct communications with area law enforcement agencies. This allows immediate request for assistance and promotes cooperative activity. In this context, local law enforcement includes Forest Service and BLM rangers. In a considerable number of parks the only back-up that a protection ranger has are officers from surrounding agencies.

The NPS must ensure that every dispatch center is staffed with qualified/certified personnel – whether the center is a NPS operation or a local law enforcement operation. Certification information is not currently available. In view of safety and liability considerations, this is an intolerable management deficiency.

Public safety dispatching is a demanding job. Turnover is high. It takes up to one year to fully train a dispatcher. It isn't until the third year that a dispatcher is fully functional. This is particularly true for dispatchers who handle protection rangers. Given protection rangers, more generous job duties, a protection dispatcher is likely to handle medical calls (Emergency Medical) and fire (wild lands and structural) as well as traditional law enforcement calls. This requires additional training (Emergency Medical Dispatch EMD) and learning on the job. Job characteristics such as shift work and holiday work limit applicants and retention. The stress of dealing with emergency situations, split-second decision making, and being constantly at the beck-and-call of the radio all take their toll. Accordingly, it is critical that a position classification be established for emergency dispatching that pays a sufficient salary to hold these crucial personnel.

There is a need for the Service to develop a position classification for public safety dispatchers department-wide, and seek approval through OPM. The inconsistencies in classification and grade are evident service-wide and are a major concern to dispatchers in numerous parks. With the type of public safety dispatching being performed, which often deals with life-and-death decisions, a higher grade and pay is warranted.

In addition, we recommend the development of 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. We further recommend that access be through a dedicated law enforcement frequency or talk group to ensure that airtime is available when protection rangers need it, as required by 446 DM. A dedicated frequency will also ensure privacy and confidentiality of transmissions, if it is encrypted. With sensitive matters discussed and criminal record information often being exchanged over rangers' radios, it is clearly not appropriate to

have a frequency shared by non-law enforcement personnel. Some state laws may in fact forbid Crime Information Center data from being conveyed over non-law enforcement channels. Dedicated law enforcement frequencies and talk groups are a rare commodity in the park service. (Note that the NPS employs many persons whose backgrounds are not thoroughly researched.)

This is an appropriate time to consider regional dispatch centers. To meet the congressional mandate to convert to narrow band digital, new radio systems will have to be fielded in all parks. Coordinated regional implementation of new systems offer impressive economies of scale. With trunking technology, regional dispatch centers can address the other radio and dispatch needs of the parks.

Location of regional centers is not a major issue. With new technologies distant centers can serve parks as well as local ones. For most parks, fielding their own center is cost prohibitive.

RECOMMENDATIONS

To upgrade communications capacity and promote officer safety, the following actions should be taken:

- 1. Establish an Office of Technology at the WASO level to restructure NPS law enforcement communications and technology.**
- 2. Prepare a master plan to restructure law enforcement communications.**
- 3. Consider developing regional dispatch centers in concert with the mandated narrow band digital deployment.**
- 4. Establish comprehensive policy to regulate communications operations.**
 - 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.
 - Establish policy to ensure that all protection rangers have access to crime information systems at the federal and state levels.
 - 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.
- 5. An agency-wide position description should be established for public safety dispatcher.**

This emergency dispatcher classification should provide sufficient salary and benefits to attract and hold qualified personnel to this demanding and difficult job. This position description should also establish criteria of when a public safety dispatcher is needed.

6. **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.**
7. **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.**

SECTION 7: POLICIES AND PROCEDURES

The law enforcement policies and procedures of the NPS are contained in two documents, Director's Order #9: Law Enforcement Program (DO-9) and the Law Enforcement Reference Manual (RM-9). These documents were issued in March of 2000, replacing NPS-9, Release No. 3, 1989. "DO-9 in conjunction with RM-9, establishes and defines standards and procedures for the National Park Service Law Enforcement Program," DO-9, 18 pages, address the NPS objective, authorities, including legislative law enforcement authority, and law enforcement chain of command and responsibilities. These items (2.5 pages) are followed by one page of "Controlling Policies":

- Congressional Policy
- Department of Interior Policy
- National Park Service Policy

These provisions place NPS policies within the governing framework of DM 446, the DOI Law Enforcement Handbook, which contains "directives and standards" that "implement statutory provisions, public law, and regulations relating to federal law enforcement." Fifteen pages of "Operational Policies, Procedures, and Standards" These topics address:

- Law Enforcement Commissions
- Ethics and Conduct
- Jurisdiction
- Cooperation with Other Law Enforcement Agencies
- Administrative Responsibilities
- Training

- Reporting Systems
- Defensive Equipment and Tactics
- Law Enforcement Vehicles and Vessels
- Special Procedures
- Emergencies

Defensive Equipment and Tactics encompasses the NPS use-of-force policies. A closing provision covers Victim and Witness Assistance.

RM-9 has nine chapters, with a varying number of sections, 35 in all, a “reserved” chapter, and three appendixes. Chapters include the following:

- Law Enforcement Administration
- Administrative Affairs and Systems
- Internal Administration and Standards
- Training Standards
- Reporting Systems
- Personal Defensive Equipment and Tactics
- Law Enforcement Vehicles and Vessels
- Special Procedures
- Financial Management of Law Enforcement Agencies

Section titles are displayed in Table 22.

Two of the three appendixes are complete:

- Title 43 Code of Federal Regulations, Employee Responsibilities and Conduct
- 446 DM.

The Memorandum of Understanding chapter is reserved.

A number of courses have been held to review the new DO-9 and RM-9, about five to date. These are designed as train-the-trainers sessions. Several participants have reported that these courses concentrate on “changes” from the previous manual. It has been NPS practice to devote a portion of the annual in-service refresher to policing updates. It is expected that this practice will continue.

Table 22

RM-9 CHAPTER AND SECTION TITLES

Chapter 1

Law Enforcement Administration

- 1-1 Law Enforcement Program
- 1-2 Law Enforcement Authority
- 1-3 Ethics and Conduct
- 1-4 Jurisdiction
- 1-5 Cooperation with Other Law Enforcement Agencies

Chapter 2

Administrative Affairs and Systems

- 2-1 Public Information and Media Relations
- 2-2 Computerized Information Systems
- 2-3 Crime Prevention and Physical Security
- 2-4 Evidence Management

Chapter 3

Internal Administration and Standards

- 3-1 Commission and Background Investigations Procedures
- 3-2 Internal Investigations
- 3-3 Boards of Review and Inquiry
- 3-4 Health and Fitness
- 3-5 Applicant Selection (Reserved)

Chapter 4

Training Standards

- 4-1 Commissioned Employee Training
- 4-2 Firearms Training and Qualifications
- 4-3 Intermediate Defensive Equipment Training

Chapter 5

Reporting Systems

- 5-1 Case Incident Reporting System
- 5-2 Violation Notices
- 5-3 Collision Reports
- 5-4 Serious Incident Notification

Chapter 6

Personal Defensive Equipment and Tactics

- 6-1 Use of Force
- 6-2 Firearms
- 6-3 Intermediate Defensive Equipment
- 6-4 Restraining Devices and Prisoner Transport
- 6-5 Uniforms, Grooming and Equipment

Chapter 7

Law Enforcement Vehicles and Vessels

- 7-1 Law Enforcement Vehicles
- 7-2 Law Enforcement Vessels
- 7-3 Emergency Response, Pursuit and Roadblocks

Table 22 (continued)	
RM-9 CHAPTER AND SECTION TITLES	
Chapter 8	<p>Special Procedures</p> <p>8-1 Foreign Nationals and Diplomatic Immunity</p> <p>8-2 Warrants</p> <p>8-3 Juveniles</p> <p>8-4 Impoundment of Property</p> <p>8-5 Selective Traffic Enforcement and Checkpoints</p> <p>8-6 Dispatch Services/Operation of Communication Centers (Reserved)</p>
Chapter 9	Financial Management of Law Enforcement Emergencies
Chapter 10	Criminal Investigations (Reserved)
Appendix I	<p>Law Enforcement Memorandum of Understanding (Reserved)</p> <p>Model Agreement with Cooperating Law Enforcement Agencies</p>
Appendix II	<p>Title 43 Code of Federal Regulations, Part 20</p> <p>Employee Responsibilities and Conduct</p>
Appendix III	Departmental Manual 446 (446 DM)

EVALUATION

The NPS undertook wholesale revision of policies and procedures in the mid-90s and completed the process just this past spring. This multi-year project, led most recently by the Ranger Activities Program, involved numerous NPS personnel. The product underwent frequent revision while in draft stages. Final approval was given by the Solicitor with the blessing of the Office of Managing Risk and Public Safety of the DOI.

Policy and procedure work is and must be an ongoing endeavor in every law enforcement agency. Accordingly, the work done by the NPS to date should be viewed as a building block in an ongoing process, and not the conclusion to a six-year effort. The NPS body of policy and procedure still requires substantial strengthening – in organization, format/construction, coverage/content, and monitoring and compliance.

The NPS policy situation suffers, somewhat unavoidably, from the sheer volume of information that must be conveyed to and consumed by rangers and other users. Consolidation of information and detailed indexing and cross referencing must be maximized to cope effectively with volume. The NPS has not maximized potential of these strategies. Information resides in three documents, 446 DM, DO-9, and RM-9. Although there is a table of contents for RM-9, it lacks sufficient detail to find a topic of interest easily. DO-9 refers users to RM-9 for details on a topic, but the reference is not specific to chapter and section, leaving the users to hunt through the entire document for the information in question. The RM-9 we received contains no index or the DM-446 appendix that is referenced in the table of contents. At least one more major organizational reconstruction of existing materials is required to introduce basic user-friendliness and access-efficiency.

Policy manuals convey important and often complex information and instruction. RM-9 is no exception. Even agencies that maintain high levels of consistency in law enforcement officer selection and training need to make operational and administrative directives easy to understand and implement. Especially because of the presence of seasonals, differences in their employment conditions, and the multi-task (non-law enforcement) concentration of duties of almost all rangers, the NPS has even greater than average variance in the knowledge and skill level of staff.

It also has, therefore, a need to employ the most user-friendly directives format available. A consciously designed format was employed to construct RM-9. Each directive segregates “policy” and “directives” (procedures). Directives may contain an introduction and definitions. (There are exceptions to this format). This construction is sensible and useful. At the same time, newer formats are available to convey complex material in a more digestible form. One of these is “information mapping.” The NPS may want to consider this approach for new directives and major revisions of existing ones.

Content issues are of greatest concern. Our review (by two independent reviewers, one a law enforcement specialist with a federal land management agency and one a police

chief with previous experience as a park police chief – non-federal) uncovered dozens of core omissions, unclear policies and/or procedures, and internal inconsistencies. Detailed lists of our observations can be forwarded for appraisal by appropriate NPS officials.

The NPS does not appear to have an effective directives education program in place or in design. To master the updates of the new manuals and to clarify confusion with current policy and procedures, much more than the start-up train-the-trainers effort is required. As expeditiously as possible, training must occur for as many rangers as possible – all classes. Regional meetings are recommended, backed up with videos and a continuing stream of updates. We heard much criticism of the lecture format employed for the trainings to date. More “adult learning” concepts should be built into future offerings. Within a year, the NPS should test the degree to which directives are understood and being complied with. A uniform, service-wide testing procedure should be designed, at the national level, for application by park superintendents, with results supplied to the regions and WASO.

RECOMMENDATIONS

To strengthen the written directives situation, the following actions are recommended:

1. **Regard the recent release as a milestone, but also as only a starting point in the ongoing process of directives development and maintenance.**
2. **Establish a formal program to coordinate, on a continuous basis, NPS law enforcement directives activities.**

We believe this program should function at the national level and be staffed by at least three specialists.

3. **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.**
4. **Reorganize/supplement the manual, paying attention to grouping of materials, indexing, cross-referencing, and other user-access considerations.**
5. **Consider reformatting the presentation of directives.**
6. **Establish a program to assess user understanding and compliance.**

SECTION 8: HUMAN RESOURCES MANAGEMENT – ORGANIZATION

The National Park Service human resources practices are based on statutes, regulations, and policies. Relevant statutes include the Civil Service Reform Act, as amended, and the specific law enforcement authority granted in the National Park Service General Authorities Act Of 1976, which provides that “the Secretary of the Interior is authorized to designate, pursuant to standards prescribed in regulations by the Secretary, certain officers or employees of the Department of the Interior who shall maintain law enforcement law and order and protect persons and property within the areas of the National Park System.” This statutory authorization is one basis for the application of policies promulgated by the Department of the Interior through Department Manual 446. The human resources program for law enforcement in the NPS must blend OPM statutory law and regulations, DOI statutory law and regulations, and NPS policies found in DO-9 and RM-9.

Numerous offices have varying levels of responsibility for implementing portions of the foregoing authorities. Human resource management responsibilities for law enforcement are found in several offices within the NPS and outside the NPS in the DOI Office of Personnel Management.

At the national level the National Park Service’s human resource responsibilities for law enforcement are divided between two offices. The Associate Director for Operations and Education is responsible for managing Ranger Careers (per directive in 1994). Responsibilities include law enforcement retirement policy and position management (6c), developing and implementing commissioning standards, policies related to enforcement (medical standards and background investigations) and, most recently (August 2000), responsibility for law enforcement training.

The Associate Director for Administration, through the Personnel Office, is responsible for managing the seasonal recruitment program (including law enforcement seasonals), personnel classification appeals, equal opportunity issues, bargaining/representation issues, and liaison to the Department of Interior and Office of Personnel Management for federal work/personnel practices.

The Department of Interior, through its Department Manual (DM446) and its Office of Safety and Enforcement, has established minimum standards for training and standards for background investigations such as the Critical Sensitive level for background investigations.

Recruitment, selection, promotion, continuing education, reward and discipline practices and occur at the field unit level. Each park or cluster of parks maintains personnel records, advertises for vacancies, undertakes promotions, and provides for awards and discipline. In some of the smaller units, these functions are provided by the seven regional personnel offices.

EVALUATION

Subsequent sections will note flaws in the law enforcement recruitment process, seasonal hiring program, and other human resources practices. There is widespread dissatisfaction with a major human resources initiative – Ranger Careers. Current flaws are due in large part to fragmentation of the personnel function. In the NPS, human resource management of the law enforcement program is not a comprehensive function, where the various elements are integrated and complement one another. It is disjointed and, reportedly, sometimes contentious. Professional law enforcement managers and professional personnel specialists clash on policy and process issues. Whatever the reality of relationships, law enforcement personnel management does not seem to be receiving the comprehensive and professional attention that the program requires.

RECOMMENDATION

To strengthen the human resources function, the following action should be taken:

Reorganize and place all aspects of human resources related to law enforcement function under the proposed Associate Director for Emergency Services and Law Enforcement.

SECTION 9: HUMAN RESOURCES MANAGEMENT – RECRUITMENT AND SELECTION

The NPS hires two categories of rangers for law enforcement assignment – permanent and seasonal. Permanent employees can work full-time or less than full-time. They can have full tenure or be classified as “permanent – subject to furlough” or “permanent part-time.” To become permanent requires meeting all basic qualifying standards for the 025 park ranger series, including competitive testing, medical and other screening criteria. Permanent employees are recruited and selected by employing parks. There is no national intake program that conducts a park ranger test or forms an interview board to evaluate abilities, aptitude, or emotional stability to carry out law enforcement duties.

Seasonal law enforcement rangers are hired for a short period of time to assist with summer/winter increases in visitation to specific parks. The employment period typically ranges from three to a maximum of six months. These rangers must obtain a required level of 285 hours of training, at their own expense, in order to qualify for seasonal jobs. The training is currently provided at 12 NPS certified academies throughout the U.S. For the most part, seasonal candidates apply in January of every year. They apply to a nationwide register maintained by the NPS Washington Personnel Office. After meeting basic qualification requirements, seasonal applicants are ranked by basic qualifications, knowledge, skills, and abilities. A list is forwarded from the centralized processing office to the employing park office. The seasonal law enforcement ranger is issued a restricted

commission that limits authority to handling misdemeanor violations, except for felonies where they assist in arrests or investigations.

Selection – Permanent Rangers. Minimum qualifications are set forth in OPM standards for the Park Ranger (025) series. Educational standards do not require a college degree. Experience may be substituted. Vacancies are announced by individual parks. Announcements normally state that positions are available “only to status employees.” Some are “all source” announcements. Applications are screened by park personnel officers to ensure minimum qualifications are met. Applications are then evaluated and competitively ranked on KSAs (knowledge, skills, and abilities), also by park personnel. A numerical score/ranking is established. A “Certificate of Eligibles” is prepared. The Certificate goes to the park hiring official. He/she selects the best candidate. An offer is then made. The offer may or may not be preceded by an interview.

Candidates who accept offers are brought aboard. Medical and background examinations are conducted. The candidate/employee is not to engage in law enforcement work until both examinations are successfully completed.

The candidate is then sent to the FLETC for basic training. Currently, the waiting period can be six months, sometimes more. Until departure for basic, law enforcement work is prohibited.

Candidates do not undergo a written entrance examination, an oral screening, or a psychological examination/screening.

Performance Evaluation. Three evaluations are to be conducted, two “informal” mid-seasons and one formal annual. Each supervisor is required to develop written performance standards. There is also a service-wide “generic” performance management plan.

Promotion. The promotion system is modeled upon, or just parallels, the entry-level selection process.

Ranger Careers. After a number of years of work, Ranger Careers was approved by the Director in 1994. Ranger Careers was/is a plan for comprehensive restructuring of the ranger human resources function. It features these elements:

- Centralized recruitment
- Centralized testing
- A central registry of qualified candidates
- Enhanced qualification standards
- Testing standards

- ❑ New position descriptions
- ❑ Pay equity

Implementation began, but foundered several years ago.

EVALUATION

The NPS human resources system has serious flaws and does not begin to approach professional law enforcement requirements. To correct the current situation requires thorough restructuring of current practices. Principal reexamination must be directed to these concerns:

- ❑ **Entry-Level Standards.** They must be based on a law enforcement job analysis.
- ❑ **Testing.** This process must include a written examination, an interview, and psychological screening.
- ❑ **Probation.** A six to 12-month probationary period should be considered.
- ❑ **Promotional Process.** Also to be job-analysis based, a competitive system is required.

Many required elements were addressed in Ranger Careers. This program should be reactivated. To accomplish the restructuring that is required, the NPS is urged to create the centralized law enforcement human resources office discussed in the previous section, at WASO.

RECOMMENDATIONS

To strengthen the human resources function, the following actions should be taken:

1. **Establish a nationwide, centralized recruitment program.**
2. **Establish a nationwide, centralized eligibility register.**
3. **Restructure the law enforcement selection process in its entirety. Ensure that from job analysis to completion of basic training the program complies with professional law enforcement standards.**
4. **Restructure the law enforcement promotion process, in its entirety. Ensure that it complies with professional law enforcement standards.**
5. **Reinvigorate Ranger Careers.**

CHAPTER III: THE STATE OF PARK LAW ENFORCEMENT – WORKFORCE PERSPECTIVES

A series of rank and position-inclusive law enforcement focus group discussions yielded broad and penetrating insights into the values, culture, concerns, and change preferences of rangers, ranger managers, and park superintendents. The discussions produced information on the nature and effectiveness of ranger operations. The foundation of focus group information and findings was further built upon through a service-wide workforce survey. This chapter captures the state of park law enforcement reflected by the surveys.

SECTION 1: SURVEY OBJECTIVES

Two populations were surveyed, rangers and park superintendents. Participation was voluntary. Responses were anonymous. The Ranger Survey was distributed to every ranger, special agent, district ranger, chief ranger, and staff park ranger, a total of 1,528. Responses were received from 942 rangers, 62%. We processed 869 of these, 57% of the total distribution. (The remainder were submitted well after deadline.) Processed returns, by position class, were as follows:

<input type="checkbox"/>	Ranger (commissioned)	562	(64.7%)
<input type="checkbox"/>	Special Agents	30	(3.4%)
<input type="checkbox"/>	District Rangers	112	(12.9%)
<input type="checkbox"/>	Chief Rangers	131	(15.1%)
<input type="checkbox"/>	Staff Park Rangers	27	(3.1%)
<input type="checkbox"/>	Declined to State	<u>7</u>	<u>(0.8%)</u>
		869	(100.0%)

The Park Superintendents Survey was distributed to every park superintendent in the system, a total of 376. Responses totaled 160, 43%. Eleven (11) surveys could not be processed due to late arrival for inclusion in findings, reducing this database to 149 responses, 40%.

The surveys were designed to elicit opinions about the following areas:

- Safety**. Judgments concerning law enforcement capacity to safeguard natural resources, visitors, and personal safety.
- Objectives**. Judgments concerning outcomes sought by the NPS and individual parks.
- Job Preparation and Direction**. Judgments concerning effectiveness of basic training; in-service training; training of park superintendents; policies and procedures; supervision.

- ❑ **Career Conditions.** Judgments concerning recruitment; selection; promotion; job assignment practices; discipline; and performance evaluation.
- ❑ **Management Obligations.** Judgments concerning accountability; program evaluation; equipment and technology.
- ❑ **Innovation.** Recommendations for improving the NPS law enforcement function.

The two surveys were not identical in construction but included a number of parallel questions.

SECTION 2: SURVEY RESULTS – OVERVIEW

An overview of survey results is presented in Tables 23, 24, and 25. Tables 23 and 24 summarize the responses of rangers and superintendents, separately, to survey items. Responses are ranked from most to least favorable, using the “satisfactory” rating. Table 25 presents an inter-class comparison of favorable ratings among five classes of rangers and park superintendents. Rangers returned favorable ratings on only four of 18 practices and conditions examined, 22%. By contrast, park superintendents responded favorably on nine of thirteen, 69%. Inter-class comparison reveals significant variation among classes of rangers. Favorable ratings correlate positively with rank/position – higher ranks and positions regard practices and condition more favorably.

SAFETY

Both rangers and park superintendents were asked to judge the capacity of the NPS to safeguard visitors, natural resources, employees, and the personal safety of rangers. Perspectives were also sought on the capacity of current communications systems, a lifeline issue for rangers.

Visitors and Workers. Rangers deem their capacity to safeguard park visitors, and park workers, to be distinctly less than satisfactory. Over two-thirds rate their ability as unsatisfactory (40.0%) or neither satisfactory nor unsatisfactory (29%). Just over 30.0% consider their ability to be satisfactory.

Visitor Safety:	Satisfactory	Neither	Unsatisfactory
❑ Rangers	31%	29%	40%
❑ Superintendents	66%	19%	16%

Table 23			
WORKFORCE SURVEY RESULTS – RANGERS			
Practices & Conditions	Satisfactory (%)	Neither Satisfactory Nor Unsatisfactory (%)	Unsatisfactory %
<u>Satisfactory to a Majority</u>			
<input type="checkbox"/> Objectives – NPS	71.2	18.0	10.8
<input type="checkbox"/> Basic Training	69.1	21.1	9.7
<input type="checkbox"/> Safety – Ranger	62.6	21.8	15.6
<u>Not Satisfactory to a Majority</u>			
<input type="checkbox"/> Objectives – Park	57.3	22.0	20.7
<input type="checkbox"/> Ranger Careers	49.7	24.0	26.3
<input type="checkbox"/> In-Service Training	48.4	30.4	21.2
<input type="checkbox"/> Direction/Supervision	45.8	23.1	31.1
<input type="checkbox"/> Policies & Procedures	35.2	32.2	32.6
<input type="checkbox"/> Equipment & Technology	32.9	26.3	40.8
<input type="checkbox"/> Safety – Visitors	30.9	28.9	40.1
<input type="checkbox"/> Promotion Practices	30.3	24.3	45.3
<input type="checkbox"/> Performance Evaluation	27.2	22.3	50.5
<input type="checkbox"/> Discipline Practices	26.2	23.5	50.3
<input type="checkbox"/> Program Evaluation	23.1	27.1	49.8
<input type="checkbox"/> Communications Systems/ Technology	23.0	17.9	59.1
<input type="checkbox"/> Safety – Natural Resources	20.1	25.3	54.5
<input type="checkbox"/> Accountability – Superintendents	14.3	19.1	66.5
<input type="checkbox"/> Recruitment & Selection	10.2	17.5	72.3

Table 24			
WORKFORCE SURVEY RESULTS – SUPERINTENDENTS			
Practices & Conditions	Satisfactory (%)	Neither Satisfactory Nor Unsatisfactory (%)	Unsatisfactory %
<u>Satisfactory to a Majority</u>			
<input type="checkbox"/> Objectives – NPS	86.6	10.7	2.7
<input type="checkbox"/> Ranger Careers	70.3	16.2	13.5
<input type="checkbox"/> Equipment & Technology	70.1	21.8	8.2
<input type="checkbox"/> Accountability	67.6	21.2	11.2
<input type="checkbox"/> Training	67.4	23.3	9.4
<input type="checkbox"/> Safety – Visitors	65.5	18.9	15.5
<input type="checkbox"/> Safety – Ranger	62.6	22.0	15.2
<input type="checkbox"/> Direction/Supervision	61.7	27.5	10.7
<input type="checkbox"/> Program Evaluation	53.8	25.2	21.1
<u>Not Satisfactory to a Majority</u>			
<input type="checkbox"/> Safety – Natural Resources	49.7	24.8	25.5
<input type="checkbox"/> Communications Systems/ Technology	34.9	20.8	44.3
<input type="checkbox"/> Formal Objectives – Park	29.9 (Yes)	--	70.1 (No)

Table 25

WORKFORCE SURVEY INTER-CLASS COMPARISON
FAVORABLE RATINGS

Practice/Condition	Comm. Rangers	Special Agents	District Rangers	Chief Rangers	Staff Rangers	Superintendents
<input type="checkbox"/> Objectives – NPS	65.2	80.0	79.5	86.3	74.0	86.6
<input type="checkbox"/> Training – Basic	65.0	76.7	81.2	73.4	73.1	--
<input type="checkbox"/> Safety – Ranger	59.3	73.3	65.7	69.5	70.3	62.6
<input type="checkbox"/> Objectives – Park	49.5	70.0	66.1	76.8	77.0	--
<input type="checkbox"/> Ranger Careers	43.0	53.4	55.4	70.7	57.6	70.3
<input type="checkbox"/> Training – In-Service	46.3	73.3	46.5	50.8	60.0	67.4
<input type="checkbox"/> Direction/Supervision	41.4	46.6	55.5	56.3	50.0	61.7
<input type="checkbox"/> Policies & Procedures	28.4	36.7	43.7	57.9	34.6	--
<input type="checkbox"/> Equipment & Technology	31.3	40.0	33.3	38.3	34.6	70.1
<input type="checkbox"/> Safety – Visitors	28.3	26.7	31.3	42.0	40.7	65.5
<input type="checkbox"/> Promotional Practices	24.0	26.7	42.3	46.5	30.7	--
<input type="checkbox"/> Performance Evaluation	26.5	23.3	25.2	31.8	30.8	--
<input type="checkbox"/> Discipline	24.1	10.0	27.9	34.9	38.5	--
<input type="checkbox"/> Communications System/ Technology	22.0	23.4	25.2	25.2	25.9	34.9
<input type="checkbox"/> Program Evaluation	19.8	13.3	24.3	38.3	24.0	53.8
Safety – Natural Resources	17.2	20.0	22.5	30.5	25.9	49.7
Accountability – Superintendents	12.0	3.3	17.2	22.3	23.1	67.6
<input type="checkbox"/> Recruiting & Selection	8.3	10.0	8.1	20.7	11.5	--

The inter-class pattern that appears consistently appears on this issue. Responses become more favorable with rank and non-field assignment. Satisfactory ratings by position class are as follows: commissioned rangers, 29%; special agent, 27%; district ranger, 31%; chief ranger, 42%; staff park rangers, 41%. Park superintendents have a decidedly more positive view than rangers. Two-thirds consider the ability of the park to safeguard visitors and workers to be satisfactory. A small minority, 16%, considers ability to be unsatisfactory.

Resources. Rangers consider their capacity to protect natural resources, facilities, and equipment to be even less adequate than their capacity to protect visitors. Over half of respondents, 55%, consider their capacity to be unsatisfactory and 29% consider their capacity to be neither satisfactory nor unsatisfactory. Only one of every five rangers has confidence in NPS capacity.

Natural Resources:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	20%	25%	55%
<input type="checkbox"/> Superintendents	50%	25%	26%

Inter-class comparison reveals greater consistency on this issue than many others. Unsatisfactory ratings, by class, are as follows: commissioned rangers, 56%; special agents, 60%; district rangers, 51%; chief rangers, 49%; staff park rangers, 56%.

Park superintendents also believe resources are at greater risk than visitors, but not to the degree that rangers do. One quarter (26%) consider the capacity to be unsatisfactory. Half (50%) feel protection ability is satisfactory.

Ranger. Rangers are highly confident in their ability to safeguard themselves. Almost two-thirds regard their ability to safeguard themselves to be satisfactory. A minority, 16%, feels their ability is unsatisfactory. Superintendent responses match ranger responses, identically. Ability is regarded to be satisfactory by 63%, and unsatisfactory by 15%.

Ranger Safety:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	63%	22%	16%
<input type="checkbox"/> Superintendents	63%	22%	15%

Communications Systems. Almost 60% of rangers regard their communications systems to be unsatisfactory. Less than one quarter regard their systems to be satisfactory. Superintendents tend to concur. Over 40% deem communications systems to be unsatisfactory. The level of dissatisfaction will not come as a surprise to NPS executives.

Communications Safety:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Rangers	23%	18%	59%
<input type="checkbox"/> Superintendents	35%	21%	44%

OBJECTIVES

Rangers were asked to rate their understanding of NPS and park law enforcement objectives. Responses were positive overall, with understanding of NPS objectives exceeding understanding of park objectives. Seventy-one percent (71%) consider their understanding of NPS law enforcement objectives to be satisfactory compared to 57% who find the understanding of park objectives to be satisfactory.

NPS Objectives:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Rangers	71%	18%	11%
<input type="checkbox"/> Superintendents	87%	11%	3%

Park Objectives:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Rangers	57%	22%	21%
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Unsatisfactory (lack of understanding) rates were 11% with regard to NPS objectives and 21% with regard to park objectives. The 21% response is cause for concern. One of every five rangers (all classes) is unclear about expected accomplishments. An additional 22% report being neither clear nor unclear. In total, almost half of all rangers are not able to declare clear understanding of desired park law enforcement objectives. The 23% and 25% ratings on park objectives are striking. There is a clear need for objectives setting and communications work at the park level.

Park superintendents report superior understanding of NPS objectives. Almost 87% declare their understanding of NPS law enforcement objectives to be satisfactory.

Less than one-third of superintendents, 29%, report that written law enforcement objectives have been developed for the parks that they manage. The NPS would do well to conduct a national review of the consistency of park objectives, park-by-park validity, technical quality, including measurability, and dissemination processes (to rangers). This endeavor might help to create the national structure of objectives that is so sorely needed.

JOB PREPARATION AND DIRECTION

Basic training, in-service and advanced training, policies and procedures, and direction and guidance (leadership supervision) are the fundamental job preparation and direction practices and conditions selected for survey.

Basic Training – Rangers. Over two-thirds of respondents rate their basic training experience as satisfactory. Basic was reported as unsatisfactory by only 10%, while 21% reported their experience to be neither satisfactory nor unsatisfactory. Rating patterns were relatively similar among positions.

Basic Training:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	69%	21%	10%

While these data suggest some need to examine improvement possibilities, the response is quite positive.

In-Service Training – Rangers. A different pattern emerges from ratings of in-service training. Less than a majority regard in-service training to be satisfactory. Twenty-one percent (21%) regard training to be unsatisfactory, while 30% consider it to be neither satisfactory nor unsatisfactory.

In-Service Training:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	48%	30%	21%

Responses from classes of rangers parallels the aggregate pattern, with the exception of special agents. This class reports a 17% unsatisfactory rating, not dramatically different from the 21% overall rating, but also reports a 73% satisfactory rating, far above the aggregate rating of 48%. Chief rangers are somewhat less dissatisfied than respondents as a whole, 14% compared to 21%.

The NPS appears to have a serious shortfall in either amount or quality of in-service training being supplied to commissioned rangers. Field interviews suggest shortfalls of each kind. Inadequacies in the NPS training database preclude objective, data-supported evaluation of many dimensions of in-service training.

Law Enforcement Training – Superintendents. Superintendents consider themselves to be well trained to lead and manage the park law enforcement function. Just over two-thirds believe that the law enforcement training received is satisfactory. Only 9% rate their training as unsatisfactory. The remainder are ambivalent about their training/preparation.

Law Enforcement Superintendents:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Superintendents	67%	23%	9%
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Field interviews indicate, unmistakably, that rangers would challenge the positive view held by superintendents. Rangers believe that many superintendents – too many – fail to possess an adequate grasp of law enforcement requirements. (Recall that 42% of superintendents have never served as law enforcement rangers.)

Policies and Procedures. A high level of dissatisfaction was registered in regard to policies and procedures. Almost one-third of respondents rate the value of written policies and procedures to be unsatisfactory for guiding/governing actions. Another third finds them to be neither satisfactory nor unsatisfactory. The remaining third regards them to be satisfactory.

Policies & Procedures:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Rangers	35%	32%	33%
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Variation in ratings among classes of positions correlates distinctly with rank, the higher ranks having far less dissatisfaction. Commissioned rangers registered an unsatisfactory rating of 39%, compared to, for example, 14% for chief rangers. The positive (satisfactory) rating from chief rangers is 58% compared to 29% for commissioned rangers. Just over 40% of district rangers regard policies and procedures to be satisfactory. Their unsatisfactory rating is 25%.

Direction and Guidance. Somewhat less than half of rangers regard supervision to be satisfactory. Twenty-three percent rate supervision as neither satisfactory nor unsatisfactory. Nearly one-third consider supervision to be unsatisfactory.

Direction/Guidance:	Satisfactory	Neither	Unsatisfactory
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<input type="checkbox"/> Rangers	46%	23%	31%
<input type="checkbox"/> Superintendents	62%	28%	11%

Variations among position classes are evident, conforming to the general pattern of highest dissatisfaction at the lowest rank and great satisfaction at higher ranks. Proportion of commissioned rangers that judge supervision to be unsatisfactory is 36%, compared to 20% for special agents, 21% for district rangers, 23% for chief rangers,

and 20% for staff park rangers. District rangers and chief rangers are most satisfied, with 55% of district rangers and 56% of chief rangers rating supervision as satisfactory.

Superintendents feel far better served by their immediate superiors. Just about 62% rate the direction and guidance from their superiors, on law enforcement matters, to be satisfactory. Only 11% rate it as unsatisfactory.

CAREER CONDITIONS

Recruitment, selection, promotion, job assignment, discipline, and performance evaluation are the practices and conditions selected for survey. In addition to their inherent significance for building and maintaining an effective law enforcement capacity, these functions are central to workforce motivation and/or dysfunction. Ranger Careers, a major NPS initiative, was added for survey evaluation purposes.

Recruitment and Selection. Unrivaled in dimension is the negative rating assigned to recruitment and selection practices, just over 72%. Even the class that reacted most favorably, chief rangers, delivered a 60% negative rating.

Recruitment/Selection:	Satisfactory	Neither	Unsatisfactory
□ Rangers	10%	18%	72%

A litany of shortcoming in these crucial areas was introduced in the previous chapter.

Promotion and Job Assignment. Promotion practices drew a heavy negative, 45%, from rangers. One-quarter regard current practices neutrally, neither satisfactory nor unsatisfactory, leaving 30% of respondents who consider practices to be satisfactory.

Promotion:	Satisfactory	Neither	Unsatisfactory
□ Rangers	30%	24%	45%

The frequently evident gap in perceptions/satisfaction between commissioned rangers and their supervisors is distinct in this area of practice as well. Twenty-four percent (24%) of rangers regard promotion and assignment practices to be satisfactory. Comparative responses from supervisors/managers are as follows: district managers – 42%; and chief rangers – 47%. Staff park rangers have views that are closer to the commissioned rangers, a 31% satisfactory rating.

Discipline. Administration of discipline is one more category of practice characterized by high negatives. Just about 50% of respondents consider current practices to be unsatisfactory and 24% more neither satisfactory nor unsatisfactory. Three-quarters of respondents did not opt for a positive response.

Discipline:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	26%	24%	50%

Even those individuals who render and review disciplinary decisions are critical of the system. Negative responses (unsatisfactory) by position class, were as follows: commissioned rangers, 53%; special agents, 77%; district rangers 47%; chief rangers, 40%; staff park rangers, 46%. The response of special agents – those who conduct internal affairs investigations, is particularly compelling and indicative of a broken system.

Performance Evaluation. Performance evaluation is regarded somewhat more negatively than promotion practices. Just over 50% of respondents consider current practices to be unsatisfactory. They are considered to be satisfactory by 27%, somewhat less than half of that number.

Performance Evaluation:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	27%	22%	51%

Dissatisfaction with current practices is distributed somewhat more consistently among classes of position in this instance than in many others. Negative ratings are high for every class. The proportion of commissioned rangers that consider performance evaluation practices to be unsatisfactory is 51%. This compares to 53% for special agents; 57% for district rangers; 40% for chief rangers; and 42% for staff park rangers. The NPS has considerable work to do to upgrade performance evaluation practices.

Ranger Careers. Implementation progress on this plan, devised to eliminate perceived inequities and tangible dissatisfaction in job classification, pay, and retirement, is regarded more positively than negatively or neutrally, but not by a majority. Close to 50% regard implementation to be proceeding satisfactorily. One-quarter of respondents consider implementation to be unsatisfactory. Another quarter consider implementation to be neither satisfactory nor unsatisfactory.

Ranger Careers:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	50%	24%	26%

Supervisors and managers judge implementation more favorably than commissioned rangers. Satisfaction ratings are as follows: chief rangers, 71%; staff park rangers, 58%; district rangers, 55%; special agents, 54%; commissioned rangers, 43%.

MANAGEMENT OBLIGATIONS

Accountability, program evaluation, and provision of equipment and contemporary technology are three priority concerns that emerged from focus group discussions that were selected for further examination.

Accountability. Two-thirds of rangers believe that the degree to which park superintendents are held accountable for law enforcement program administration is unsatisfactory. The positive (satisfactory) rating was only 14%.

Accountability:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	14%	19%	67%
<input type="checkbox"/> Superintendents	68%	21%	11%

Every class of ranger considers accountability practices to be unsatisfactory: commissioned rangers, 70%; special agents, 83%; district rangers, 64%; chief rangers, 52%; and staff park rangers, 69%.

Park superintendents judge practices quite differently. Two-thirds of park superintendents believe that the degree to which they are held accountable for their management of the law enforcement program is satisfactory. Only 11% regard accountability practices as unsatisfactory. A sizeable portion, 21%, feel it is neither satisfactory nor unsatisfactory.

Program Evaluation. Almost half of ranger respondents consider program evaluation practices to be unsatisfactory. Half that number, 23%, consider practices to be satisfactory. A large proportion, 27%, opts for neither satisfactory nor unsatisfactory.

Program Evaluation:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	23%	27%	50%
<input type="checkbox"/> Superintendents	54%	25%	21%

Measurable variation characterizes responses from classes. Special agents reported dissatisfaction at the 77% level; commissioned rangers at 54%; while unsatisfactory ratings from other classes ranged from 39% for chief rangers to 49% for district rangers.

Park superintendents regard program evaluation practices much more favorably than rangers, but only slightly more so than ranger supervisors. Just over 50% of superintendents consider evaluation practices to be satisfactory. A sizeable portion, however, 21%, consider them to be unsatisfactory.

Equipment and Technology. Just over 40% of rangers believe that the amount and quality of law enforcement equipment, technology, and information provided is unsatisfactory. One-third believe conditions to be satisfactory. A large proportion of respondents 26% find conditions to be neither satisfactory nor unsatisfactory.

Equipment & Technology:	Satisfactory	Neither	Unsatisfactory
<input type="checkbox"/> Rangers	33%	26%	41%
<input type="checkbox"/> Superintendents	70%	22%	8%

Variations in responses among classes of positions are not extreme, though observable. Unsatisfactory ratings, by class, are as follows: commissioned rangers, 44%, special agents, 40%; district rangers, 37%; chief rangers, 33%, staff park rangers, 35%.

More striking is an extraordinary disparity between judgements of park superintendents and all classes of rangers. Seventy percent of superintendents regard the amount and quality of law enforcement equipment, technology, and information provided to rangers to be satisfactory. The highest satisfactory rating among ranger classes was by special agents at 40%, followed by chief rangers at 38%.

SECTION 3: GENDER RESPONSES

The values, perspectives, and interests of female rangers is currently a priority interest of the NPS. It should be informative to note that survey responses of female rangers did not differ in any statistically significant way from those of male rangers, on any item in the survey.

Table 26 displays the mean response to all survey items from all male and female respondents (all classes and positions). Overall, female respondents are somewhat younger (39 years of age compared to 42) and have slightly less experience (13 years compared to 16) and are somewhat better educated (not shown in Table 26). The mean scores (column 3) reflect the composite response on the five option survey scale (unsatisfactory to satisfactory – one to five). Application of two statistical techniques, analysis of variance, and the Pearson Chi-Square, confirm consistency of gender response. For statistical significance, the mean value (Column 3 on table 26) would have to fall outside of the 95% confidence interval for means (Columns 5 and 6 on table 26).

Table 26
GENDER RESPONSES – MEAN RATINGS

		N	Mean	Std. Deviation	Std. Error	95% Confidence Interval for Mean *		Minimum	Maximum
						Lower Bound	Upper Bound		
Age	Male	719	42.0028	7.9916	.2980	41.4177	42.5879	22.00	66.00
	Female	134	39.3284	6.3551	.5490	38.2425	40.4143	23.00	57.00
	Total	853	41.5826	7.8150	.2676	41.0575	42.1078	22.00	66.00
Years with NPS	Male	724	16.1934	7.7335	.2874	15.6291	16.7576	.00	37.00
	Female	136	13.8750	6.1397	.5265	12.8338	14.9162	1.00	31.00
	Total	860	15.8267	7.5485	.2574	15.3215	16.3320	.00	37.00
NPS Enforcement Objectives	Male	724	3.9724	1.0633	3.952E-02	3.8948	4.0500	1.00	5.00
	Female	136	3.8309	.9627	8.255E-02	3.6676	3.9941	1.00	5.00
	Total	860	3.9500	1.0488	3.576E-02	3.8798	4.0202	1.00	5.00
Park Enforcement Objectives	Male	717	3.5941	1.2590	4.702E-02	3.5018	3.6865	1.00	5.00
	Female	136	3.5147	1.1800	.1012	3.3146	3.7148	1.00	5.00
	Total	853	3.5815	1.2464	4.268E-02	3.4977	3.6652	1.00	5.00
Basic/Academy Training	Male	716	3.8980	1.0225	3.821E-02	3.8230	3.9731	1.00	5.00
	Female	134	3.8209	.9722	8.398E-02	3.6548	3.9870	1.00	5.00
	Total	850	3.8859	1.0146	3.480E-02	3.8176	3.9542	1.00	5.00
In-Service/Advanced Training	Male	691	3.4410	1.1250	4.280E-02	3.3270	3.4950	1.00	5.00
	Female	125	3.4160	1.0563	9.448E-02	3.2290	3.6030	1.00	5.00
	Total	816	3.4118	1.1141	3.900E-02	3.3352	3.4883	1.00	5.00
Written Policies and Procedures	Male	717	2.9819	1.1104	4.147E-02	2.9005	3.0633	1.00	5.00
	Female	136	2.9706	1.0395	8.914E-02	2.7943	3.1469	1.00	5.00
	Total	853	2.9801	1.0988	3.762E-02	2.9062	3.0539	1.00	5.00
Supervision	Male	712	3.2289	1.3311	4.988E-02	3.1310	3.3269	1.00	5.00
	Female	134	3.1493	1.2416	.0173	2.9371	3.3614	1.00	5.00
	Total	846	3.2163	1.3169	4.528E-02	3.1274	3.3052	1.00	5.00
Promotion/Job Assignment	Male	718	2.6978	1.3009	4.855E-02	2.6025	2.7931	1.00	5.00
	Female	135	2.8815	1.4714	.1266	2.6310	3.1319	1.00	12.00
	Total	853	2.7268	1.3301	4.554E-02	2.6375	2.8162	1.00	12.00
Performance Evaluation	Male	720	2.6250	1.2901	4-808E-02	2.5306	2.7194	1.00	5.00
	Female	134	2.5672	1.3004	.1123	2.3450	2.7894	1.00	5.00
	Total	854	2.6159	1.2912	4.418E-02	2.5292	2.7026	1.00	5.00

		N	Mean	Std. Deviation	Std. Error	95% Confidence Interval for Mean *		Minimum	Maximum
						Lower Bound	Upper Bound		
Discipline	Male	719	2.6161	1.2656	4.720E-02	2.5235	2.7088	1.00	5.00
	Female	133	2.5263	1.2648	.1097	2.3094	2.7433	1.00	5.00
	Total	852	2.6021	1.2652	4.334E-02	2.5170	2.6872	1.00	5.00
Equipment/Technology/Information	Male	719	2.8832	1.1873	4.428E-02	2.7962	2.9701	1.00	5.00
	Female	135	2.7259	1.2604	.1085	2.5114	2.9405	1.00	5.00
	Total	854	2.8583	1.1998	4.106E-02	2.7777	2.9389	1.00	5.00
Recruiting and Selection	Male	723	1.9710	1.0303	3.832E-02	1.8957	2.0462	1.00	5.00
	Female	133	2.1053	1.1366	9.856E-02	1.9103	2.3002	1.00	5.00
	Total	856	1.9918	1.0479	3.582E-02	1.9215	2.0621	1.00	5.00
Ranger Careers	Male	720	3.3528	1.2649	4.714E-02	3.2602	3.4453	1.00	5.00
	Female	132	3.3333	1.1700	.1018	3.1319	3.5348	1.00	5.00
	Total	852	3.3498	1.2500	4.283E-02	3.2657	3.4338	1.00	5.00
Program Evaluation	Male	713	2.5820	1.1788	4.415E-02	2.4954	2.6687	1.00	5.00
	Female	130	2.4923	1.0872	9.536E-02	2.3036	2.6810	1.00	5.00
	Total	843	2.5682	1.1640	4.013E-02	2.4895	2.6470	1.00	5.00
Superintendents Accountable	Male	718	2.1058	1.1715	4.372E-02	2.0200	2.1917	1.00	5.00
	Female	129	2.1008	1.0814	9.521E-02	1.9124	2.2892	1.00	5.00
	Total	847	2.1051	1.1576	3.978E-02	2.2070	2.1831	1.00	5.00
Safeguard Visitors – Workers	Male	724	2.8494	1.1670	4.337E-02	2.7643	2.9346	1.00	5.00
	Female	134	2.8433	1.0958	9.466E-02	2.6560	3.0305	1.00	5.00
	Total	858	2.8485	1.1555	3.945E-02	2.7711	2.9259	1.00	5.00
Safeguard Resources – Facilities	Male	723	2.4869	1.1156	4.149E-02	2.4054	2.5683	1.00	5.00
	Female	135	2.5037	1.0712	9.219E-02	2.3214	2.6860	1.00	5.00
	Total	858	2.4895	1.1082	3.783E-02	2.4153	2.5638	1.00	5.00
Safeguard Self	Male	724	3.6644	1.0685	3.971E-02	3.5864	3.7423	1.00	5.00
	Female	134	3.5075	1.0882	9.401E-02	3.3215	3.6934	1.00	5.00
	Total	858	2.3718	1.3081	4.466E-02	2.2841	2.4594	1.00	5.00
Communications System	Male	724	2.3381	1.3159	4.890E-02	2.2921	2.4841	1.00	5.00
	Female	134	2.2836	1.2662	.1094	2.0672	2.4999	1.00	5.00
	Total	848	2.3718	1.3081	4.466E-02	2.2841	2.4594	1.00	5.00

SECTION 4: ACTION IMPLICATIONS

The law enforcement workforce – rangers and park superintendents – acknowledges presence of law enforcement assets. Understanding of NPS objectives is the one condition rated highly positive by both rangers and park superintendents. Rangers are also positive about these factors:

- Basic Training
- Capacity to Protect Their Own Safety

Superintendents are also positive about these factors:

- Implementation of the Ranger Careers Program
- The Equipment and Technology Supplied to Rangers
- Their Own Level of Accountability
- Ranger Training
- Capacity of Rangers to Protect Themselves
- Capacity of Rangers to Protect Visitors
- Direction and Guidance on Law Enforcement Matters, Which They Receive From Their Supervisors

The perceived assets are offset by a lengthier series of perceived shortfalls that concentrate in three areas: insufficient law enforcement capacity to achieve the core mission of the NPS (safety); law enforcement infrastructure/support shortfalls (job preparation and direction); human resources management (career conditions). Rangers regard the following NPS law enforcement practices and conditions to be unsatisfactory:

- Capacity to Safeguard Natural Resources
- Capacity to Safeguard Visitors
- Park Law Enforcement Objectives
- In-Service and Advanced Training
- Policies and Procedures
- Supervision
- Equipment and Technology
- Communications Systems
- Recruitment
- Selection

- ❑ Promotion
- ❑ Discipline
- ❑ Performance Evaluation

Rangers also feel that park superintendents are not held sufficiently accountable for law enforcement conditions and practices, and as a corollary matter, pay insufficient attention to program evaluation.

Park superintendents concur with ranger judgements of shortfalls in only a limited number of areas:

- ❑ Park Law Enforcement Objectives
- ❑ Communications Systems
- ❑ Program Evaluation

We believe substantial work needs to be done in all of the shortfall areas identified by rangers and superintendents.

SECTION 5: LEADERSHIP ISSUES

Two important observations emerge from analysis of responses by position. First, disparities exist, overall, among all six classes of respondents (five classes of rangers and park superintendents). Although there is reasonable agreement on individual items, aggregate responses are more different than alike. Second, and more significant, judgements correlate with rank. The least positive judgements come from first-line officers – the commissioned ranger – the most positive judgements from park superintendents. The supervisory class, district rangers, regard practices and conditions more favorably than their subordinates but less favorably than their superiors, the chief rangers. Responses of chief rangers align more closely with those of superintendents than commissioned rangers. This pattern is not uncommon in law enforcement settings and public and private sector organizations generally. The perceptions gap goes far, however, to explain:

- ❑ The frustration that rangers feel with regard to management,
- ❑ The common belief among rangers that management doesn't understand (or appreciate) law enforcement conditions,
- ❑ Why rangers feel under-valued.

The base of common understanding is far too narrow. Intense inter-position dialogue is advisable, among several levels of positions. Mainly, however, these gaps underscore just how much rangers require leadership that they can rally behind.

SECTION 6: REMEDIES

Rangers and park superintendents offered dozens of remedies for perceived shortfalls and for meeting emerging challenges. Many of the consensus choices are itemized below.

SAFETY

The most frequent ranger responses to the survey request to recommend actions that promise to enhance visitor, worker, property, or ranger safety were the following:

- ❑ More law enforcement rangers are needed for system wide back-up; improved visitor and officer safety; stop downsizing by losing positions to other divisions every time a ranger retires; stop adding acreage while law enforcement staffing is decreasing; remove interpretation duties from law enforcement rangers and allow them to concentrate more on law enforcement functions; more non-law enforcement staff to facilitate law enforcement staff getting out on the road
- ❑ Improved radio communications training (when new equipment is on site); upgrade dispatcher training and qualification; 24/7 dispatch coverage

Superintendents' responses paralleled ranger responses very closely:

- ❑ Greater staffing – more law enforcement rangers; staffing matched to visitor patterns; keep pace with NPS expansion; implement Authorities Act; more non-law enforcement staff to free law enforcement staff time; more than one ranger on duty at a time
- ❑ More training for law enforcement rangers at in-service level – advanced officer survival and safety; improved ELT to include non-law enforcement issues; more reality-based training; refresher every two years; On the Job Training (OJT) in larger parks Field Training/Evaluation Program (FTEP) after recruit training

EQUIPMENT, TECHNOLOGY, AND INFORMATION

The most frequent ranger responses to the survey request to recommend equipment, technology, or information to enable them to perform better were the following:

- ❑ Adequate 24-hour, 7-days-a-week dispatch capability, with adequate links to local law enforcement; with competent staff; improved design and equipment, as well as dedicated law enforcement frequencies; a secure system; elimination of dead spots through use of repeaters, cell or satellite phones; better communications equipment and linkage to local law enforcement databases/dispatches
- ❑ Fix the Case Incident Reporting System (CIRS) – inadequate for field use; needs to be more user friendly and Windows versus current DOS system
- ❑ Police package marked vehicles for law enforcement rangers, with appropriate lights and siren equipment; vehicle prisoner transport screens
- ❑ In-vehicle Mobile Data Terminals (MDT) system for access to national/local databases without dispatch assistance
- ❑ Improved computer network for training, incident reporting; with more computers available to rangers for report preparation; laptops for field report writing
- ❑ Vehicle-mounted video recorder system
- ❑ Full complement of equipment per ranger for all situations, permanently assigned to the ranger at the Federal Law Enforcement Training Center's initial training, and move with him to new locations; issued against national standards; centralized procurement
- ❑ Night vision equipment to support single officers working at night

In this area, as in the previous one, superintendents' recommendations parallel those of rangers very closely:

- ❑ Improved communications systems; cell/satellite phones in remote areas; Nextel phones; narrow band systems; national channel; updated portables; Mobile Data Laptops; focus on remote areas
- ❑ More and newer vehicles in good condition; Interior-owned; police packages; more planes and boats; cages in vehicles; better emergency lights
- ❑ 24-hour dispatch services, by professionals, either in-house or contracted from local agencies; use Department of Justice grants to local agencies to mandate inclusion of federal dispatch; remote dispatch facility

TRAINING

To perform the law enforcement role more effectively, rangers are anxious to have or have more of the following kinds of training:

- ❑ Tactical firearms training to include realistic, stress/combat courses; simulations; additional technical training in firearms; firearms instructor training; M-16 training; less than lethal weapons training
- ❑ Defensive tactics updates that are more meaningful, more timely, and taught by ranger personnel; intermediate course also needed; arrest techniques, ASP Baton, OC (pepper spray); training every month or so throughout the year, done locally, but reviewed for quality; periodic localized training on a decentralized basis
- ❑ 40 hours in-service, based on national standards, funded at national level, developed by FLETC; needs improvement in design and delivery; standardized with quality hands-on scenario-driven, performance-based material
- ❑ More emphasis on basic and advanced resource-related law enforcement; includes advanced resource protection course; park-specific resource; Archeological Resource Protection Act (ARPA) training
- ❑ Interviews and interrogations, especially for small to medium parks, without CI support available; criminal investigations course; investigative equipment and techniques; evidence collection
- ❑ Tactical operations, especially dealing with park-situated schools where potential for problems exist; officer survival skills; building searches; tactical and crowd control training; more realistic special operations course

Superintendents believe that they would be able to conduct their leadership and management role effectively were the following types of training available or more available:

- ❑ Law enforcement for managers be taken every five years; at more convenient times and locations; take on the road
- ❑ Annual update summaries for managers on changes in law enforcement operations and techniques; use of Internet to accomplish; use for exchange between students
- ❑ Program management training emphasizing accountability problem resolution; best management approaches; executive coaching; policy development; law enforcement program effectiveness monitoring;

termination procedures; IA issues; team building; recruiting; how to manage resource duties

- ❑ Two-day training for staff on the law enforcement mission and function within the NPS (most older Superintendents do not realize changes taking place); the manager's role in law enforcement when he/she is not recognized as law enforcement
- ❑ More training on DO-9 and 36CFR, with a superintendent's checklist for the DO 9 and RM-9

CONSTRUCTING A MORE EFFECTIVE LAW ENFORCEMENT FUNCTION

To construct a more effective law enforcement function for visitors, rangers, and the NPS overall, rangers recommend the following improvements:

- ❑ Need to implement national level oversight and control of the law enforcement system within the NPS (regional offices have been downsized and deprogrammed regarding law enforcement); remove from control of superintendents; must be a cop to supervise a cop; prevent non-law enforcement personnel from supervising park law enforcement personnel; need a national chief of park law enforcement rangers with delineated command structure direct to the ranger level; no non-law enforcement managers in the chain
- ❑ More rangers to match the increase size and visitation levels of the parks; prevent rangers from working alone without benefit of back-up; increase funding; reduce collateral duties; supervisors need to understand the safety problem that can result in serious injuries to the officer and are the result of the staffing shortage and patrolling alone
- ❑ Increased support from management, so that the term "law enforcement" is not devalued and ranger suggestions and comments are accepted; change NPS management view of ranger program and how they should be used in the bigger picture
- ❑ Increased budgeting for the recruitment, processing, hiring and training of law enforcement rangers; better use of background checks on personnel hired, including park vendor personnel
- ❑ Improve law enforcement supervision with better quality and better trained personnel
- ❑ Address the 6c retirement issue and the outstanding backlog of claims filed by rangers since 1989; especially the fact that it is limits application

for available law enforcement jobs within NPS due to non 6c status; remove from commissioned and 6c status persons who no longer perform law enforcement work; commissioned rangers should be under the law enforcement retirement system regardless of 51% rule; establish a career path that allows rangers to be promoted and transferred through superintendent and director, without losing law enforcement retirement coverage

In each of the foregoing areas, rangers and superintendents offered reinforcing recommendations. That is not the case in this set. Primary recommendations from superintendents are as follows:

- ❑ Focus on the “integrated operation” of the parks, not just the law enforcement function; protection of resources and non-law enforcement activities need continued focus.
- ❑ Hire, train and deploy sufficient numbers of law enforcement rangers in order to protect park resources; ranger program has not produced the level of dollars needed to support it, thus impacting on ranger career system.
- ❑ Law enforcement rangers should receive better training on the total mission and purpose of the parks, not just law enforcement as currently given; better recruitment, training, coupled with a well-defined career ladder for law enforcement track.
- ❑ Fully integrate law enforcement operations and not stovepipe it like the Forest Service, who suffered severe cuts after; need full integration; better supervision and support by management, coupled with quality training, policies and procedures.
- ❑ Law enforcement rangers are but one cog in the total role of park service to the visitor and citizens; must be part of the team approach.

The four sets of recommendations, considered collectively, provide an extensive range of actions, that both rangers and park superintendents would support.

CHAPTER IV: ISSUES AND OPPORTUNITIES

The foregoing chapters itemize dozens of issues, that the NPS must address. Many others surfaced during the study, which also require attention and in many instances further examination. Among those worthy of priority consideration are the following:

- **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.
- **Audits and Inspections.** Some years ago, the NPS conducted compliance audits. This core management function has become a victim of decentralization and downsizing. The inspection function must be restored.
- **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.
- **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.
- **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.
- **Detention/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.

We recommend that the NPS rehabilitate existing holding facilities to bring them up to standard and construct new facilities where appropriate. These facilities can be multiple jurisdictional and shared with other agencies. Moreover, to reduce travel and fuel costs associated with an initial appearance before the U.S. Magistrate, the NPS should explore video-teleconferencing and enhanced release on own recognizance procedures with the U.S. Courts.

- **A Law Enforcement Uniform.** Law enforcement 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.
- **Park Police Captains.** Park police 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.
- **Concession/Service Operations.** The NPS reports that, at larger parks in particular, concession/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 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.

- **Improved Records Management.** The NPS incident reporting system (CIRS) suffers a number of inadequacies. Its on-line 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.

- **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.
- **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.
- **Prosecution of Federal Misdemeanor Offenses.** Significant proportions of park units seems 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.
- **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.

- **Commissions.** Conditions exist where law enforcement programs are presently managed by non-commissioned personnel. These managers fit in two categories: those who at one time were commissioned, but are no longer credentialed, and those who have never been commissioned. This practice has to be reviewed. We find compelling reasons to insist that key law enforcement commanders and supervisors be commissioned.

CHAPTER V: THE NPS LAW ENFORCEMENT CULTURE – PROSPECT FOR CHANGE

Preceding chapters discussed many issues and needs, proposed a number of solutions, and simply listed many unaddressed issues and opportunities. We suspect that the NPS requires the better part of the next decade to lift the law enforcement function to the level and status it deserves. It should begin immediately. Rangers should remain patient. Complex systems simply don't change easily. Those who are or become responsible for the change process must be ever mindful that success in transforming organizations is far less a matter of introducing individual or even clusters of tactical or program innovations than a matter of cultural transformation. There must be a DOI/NPS "will" to dramatically reconfigure the law enforcement function. Attention should be paid to principles of change, which includes meaningful power sharing and collaboration with rangers. In this environment the policy and program solutions will emerge and "implement" quite readily and quite successfully.

The following attributes appear to characterize the NPS culture. They should receive due regard as the NPS pursues a change agenda. Several bode well for successful change. Most present challenges for successful organizational transformation. A number of these attributes are correlates of currently existing law enforcement operations and management shortfalls.

- ❑ **The Prime Asset.** The current ranger force is well-educated, deep in experience, joined the NPS because of a conscious dedication to its mission, and is committed to a career in land/resource protection.
- ❑ **Demand for Change.** A demand for change from rangers is palpable. Morale is still positive, generally. The ranger force is pursuing change in the most professional manner and should continue to do so. It seeks collaborative and constructive dialog, and responsiveness.
- ❑ **An Unfinished Design.** We are not able to assert that the NPS has ever fashioned a design for a full-scope, professional law enforcement function. There is clear evidence of measurable improvement during recent decades. Progress seems to have occurred randomly, in a slow and reactive manner, and not from comprehensive design and engineering. Emerging conditions advise that the NPS reverse tradition in this regard.
- ❑ **A Profusion of Systems and Standards.** Not surprising in view of the "design" condition, the number of variations in law enforcement approaches, staffing configurations, management and supervisory styles, compliance requirements, equipment standards and many other critical aspects of the protection function defy cataloguing. NPS law enforcement can justly be described as a profusion of conditions and practices in search of a system.

- ❑ **Marginalized Status.** From the ground up, the law enforcement voice appears to be less audible than it should be – within the parks and at the DOI/WASO headquarters. Second only to perceived staffing shortfalls, rangers wish to emerge, in their own view, from second-class status. Absence of law enforcement goals and objectives in the just released 2000-2005 NPS Strategic Plan, and infrequent references in other “vision” documents, seems to substantiate ranger self-perceptions.
- ❑ **Law Enforcement and the Core Mission.** Related to the marginalization issue is a belief among rangers that park superintendents and NPS executive staff at WASO fail to appreciate the connection between law enforcement and the core mission of the NPS.
- ❑ **Decentralization and Downsizing.** Decentralization and downsizing seem to have destabilized a number of management and oversight mechanisms that remain to be reconstituted. Several examples can be found. Operation and Policy audits have vanished. Today, NPS is unable to provide, on a readily available and service-wide basis, information on size and location of staff and training and personnel histories.
- ❑ **Role Tension.** The generalist-specialist debate, and the corollary issue, collateral duty is also a destabilizing influence. The NPS needs to deliver an assertive message to quiet this debate.
- ❑ **NPS Resource Shortages.** NPS has finite resources, insufficient in total to accommodate the many law enforcement and non-law enforcement needs. This requires that change agents concentrate on priorities and recognize that many important needs just cannot be funded. Rangers must also accept this reality.
- ❑ **Poverty of Data.** The NPS is poorly positioned to examine and evaluate law enforcement successes, inadequacies, and emerging trends of significance. This has profound implications for the change process. The data presented in the preceding chapter was assembled with great difficulty. Many analyses we hoped to complete were aborted for lack of data. Some of this condition seems to be rooted in the decentralization, which occurred several years ago. It is reported that data collection responsibilities were dispersed to regions. Central authority no longer seems to exist to mandate and set standards for comprehensive and reliable data.
- ❑ **Law Enforcement Fragmentation.** The DOI has urged greater collaboration among its several natural resources/land management law enforcement agencies. We find underachievement at NPS in this regard. Collaboration hosts enormous opportunity that should be exploited during the forthcoming change period.

INDEPENDENT PERSPECTIVES

Law enforcement is but one of the many functions and concerns of the NPS. As a component of a system, of a network of functions, its future is inextricably bound up with others. The general condition of the NPS and its future are subjects of a number of important recent studies. These studies indicate that many problems facing law enforcement are reflections of problems facing the system generally. In this regard, positive change for the law enforcement function is dependent upon positive change for the NPS overall. Expectations for dramatic change to the law enforcement function should be formed accordingly.

The Vail Symposium Steering Coming and Work Groups. In October 1991, 700 persons were brought together in Vail, Colorado, to “consider the future of the national park system.” While initiated by the NPS, the Steering Committee, the body responsible for funding and recommendations, was composed primarily of credentialed individuals from public interest groups, the private sector, and university community. The Symposium report, National Parks for the 21st Century: The Vail Agenda, is virtually silent on law enforcement. It says much about the context in which law enforcement rangers function:

- ❑ “The National Park Service has a phenomenally dedicated workforce, some of the nation’s most treasured resources under its management, and widespread support from the American public. At the same time, however, it suffers from declining morale, an increasingly diffuse set of park units and programs that it is mandated to manage, serious fiscal constraints, and personnel and organizational structures that often impede its performance.” (p. 2)
- ❑ “The 75th Anniversary Symposium represents a unique event, and perhaps a turning point, in the history of the nation’s park policies. In spite of the fact that the National Park Service is widely and deeply respected by the general public, which sees the Service reflected through the national treasures in its charge, the agency is beset by controversy, concern, weakened morale, and declining effectiveness. The symposium revealed a deeply disturbing sense that the nation is risking a deterioration of its natural and cultural heritage that not even the most dedicated personnel can effectively prevent.” (pp. 4 and 5)
- ❑ The National Park Service has great strengths – and it has major problems. Without question, its greatest strength is its employees. For the vast majority of its employees, to work for the Service is to engage in an ever-renewing project of preserving and protecting some of the nation’s and the world’s most meaningful and enriching – and, often, most fragile and threatened – natural and cultural resources. Throughout the organization, the individuals who work for the Service are precisely those who are drawn to this challenge and who hold forcefully to personal stakes

in the units and programs for which they are responsible. They are drawn despite a pay scale that is commonly one or two steps below that of comparably responsible and experienced employees in other sister federal agencies, and despite the common frustrations associated with bureaucracies and politics.

“When individuals with this much dedication encounter roadblocks to performance, the result is a weakening of morale and effectiveness. Perceptions exist among many employees and observers – and not without bases in reality – that good job performance is impeded by lowered educational requirements and eroding professionalism; that initiative is thwarted by inadequately trained managers and politicized decision making; that the Service lacks the information and resource management/research capability it needs to be able to pursue and defend its mission and resources in Washington, DC and in the communities that surround the park units; that the mission and the budget of the Service is being diluted by increasing and tangential responsibilities; that there is a mismatch between the demand that the park units be protected and the tools available when the threats to park resources and values are increasingly coming from outside unit boundaries; and that communication within the Service repeatedly breaks down between field personnel and regional and headquarters management. The results of these perceptions are that the National Park Service faces significant morale and performance problems.” (pp. 8 and 9)

- ❑ Some specific park units or programmatic responsibilities might, arguably, be better placed with other private, state, local, tribal, or federal agencies. Nevertheless, the broad range of resources and functions now managed by the National Park Service represents a permanent reality. Effective management of such a diffuse system requires the abandonment of any hope for a single, simple management philosophy. This is particularly difficult for an agency with its origins – and its identification in the public’s mind – in the management and protection of the nation’s most spectacular areas, the “crown jewels.”
- ❑ As new responsibilities have been added (and have attracted at least initial funding), the core operational budget of the Service has remained flat in real terms since 1983. Meanwhile, recreational visits to park units have risen sharply (25%) over the same period, reaching almost 260 million in 1990. Clearly, the capability of the Service to pursue its most central purposes of resource protection and public enjoyment is being stretched thinner and thinner. These disturbing problems are not the sole responsibility of Congress. The Service, partly through its own inaction and partly due to constraints emanating from the executive branch during the 1970s and 1980s, has lost the credibility and capability it must

possess in order to play a proactive role in charting its own course, in defining and defending its core mission.

General Accounting Office. This 1995 review by the GAO, like the Vail assessment, did not specifically address law enforcement/protection considerations. Like Vail, it provides contextual evidence of the environment in which law enforcement must be conducted and opportunity for successful change:

- ❑ There is cause for concern about the health of national parks for both visitor services and resource management. The overall level of visitor services was deteriorating at most of the park units that GAO reviewed. Services were being cut back, and the condition of many trails, campgrounds, and other facilities was declining. Trends in resource management were less clear because most park managers lacked sufficient data to determine the overall condition of their parks' natural and cultural resources. In some cases, parks lacked an inventory of the resources under their protection.
- ❑ Two factors particularly affected the level of visitor services and the management of park resources. These were (1) additional operating requirements and (2) increased visitation, which drives up the parks' operating costs. These two factors seriously eroded funding increases since the mid-1980s.
- ❑ The national park system is at a crossroads. While the system continues to grow, conditions at the parks have been declining, and the dollar amount of the maintenance backlog has jumped from \$1.9 billion in 1988 to over \$4 billion today. Dealing with this situation involves making difficult choices about how parks are funded and managed. These choices call for efforts on the part of the Park Service, the administration, and the Congress and center on one or more of the following: 1) increasing the amount of financial resources going to the parks, 2) limiting or reducing the number of units in the park system, and 3) reducing the level of visitor services. Additionally, the Park Service should be able to stretch available resources by operating more efficiently and continuing to improve its financial management and performance measurement systems.

International Association of Chiefs of Police (1970). We end by referencing a study conducted by our organization 30 years ago. It is instructive to note that many of the issues examined remain issues today – as do several recommendations.

“A Staff Study of the Law Enforcement and Public Safety Resources In the National Park Service” was conducted to answer this questions:

What law enforcement organization, policies, programs and procedures are required in each of the national parks, based on individual parks’

needs, to ensure the appropriate professional level of public safety, to permit the visiting public to enjoy the parks in relative peace and safety, and to preserve the scenery and the natural and historic objects and the wildlife living in the environment?

Noting steady increases in visitation, increases in serious crime, a poor clearance record, training gaps, and staffing levels that were not “sufficient to cope with increases in attendance and crime within the parks,” the study called for major initiatives in the following areas of concern:

- ❑ Organization – an assistant director for law enforcement and public safety reporting to the deputy director for Operations
- ❑ Management Training – a 200-hour training program
- ❑ Recruit Training – a 500-hour basic training program
- ❑ Policies and Procedures – service wide national level policy
- ❑ Advanced Training – for chief rangers, including attendance of the FBI National Academy
- ❑ Seasonal Ranger Training
- ❑ Recruitment and Selection – minimum educational requirements, a law enforcement/public safety career track within the “025 Park Ranger” series
- ❑ Communications – central communications centers in “primary” and “secondary” parks
- ❑ Records Management – a service wide law enforcement records system
- ❑ Patrol – 24-hour patrol in major parks during peak visitation season
- ❑ Civilianization – discontinue assigning non-police duties to public safety park rangers

The foregoing are but a sample of the recommendations.

