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United States Government Accountability Office
Washington, DC 20548

June 14, 2010

The Honorable Robert C. Byrd
Chairman
The Honorable George Voinovich
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
United States Senate

The Honorable David E. Price
Chairman
The Honorable Harold Rogers
Ranking Member
Subcommittee on Homeland Security
Committee on Appropriations
House of Representatives

Subject: Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts

We have identified several workforce related challenges faced by the Federal Protective Service (FPS) since its transfer to the Department of Homeland Security (DHS) in 2003, including low morale among staff, increased attrition, and the loss of institutional knowledge. Our prior work has found that FPS continues to face challenges in identifying the optimal number of staff needed to adequately conduct its mission.¹

In response to Congress's mandate in the House Report, which accompanied the DHS fiscal year 2009 Appropriations Act² requiring GAO to evaluate the adequacy of FPS's workforce size, this report includes preliminary observations on the following questions:

¹GAO, *Homeland Security: The Federal Protective Service Faces Several Challenges That Hamper Its Ability to Protect Federal Facilities*, [GAO-08-683](#) (Washington, D.C.: June 11, 2008), and GAO, *Homeland Security: Federal Protective Service Should Improve Human Capital Planning and Better Communicate with Tenants*, [GAO-09-749](#) (Washington, D.C.: July 30, 2009).

²H.R. No. 110-862, at 59 (2008).

(1) What is the current status of FPS's efforts to determine its workforce requirements?

(2) To what extent do FPS's efforts align with commonly used workforce analysis and planning practices?

(3) What, if any, challenges may impede implementation of FPS's efforts?

This correspondence includes the briefing we provided your staff on May 18, 2010 (see enc. I). As agreed we will provide the committee with a final report when FPS's workforce analysis plan is finalized.

Agency Comments and Our Evaluation

We provided a copy of this report to the National Protection and Programs Directorate (NPPD) of DHS for its review and comment. In his comments, the Under Secretary of NPPD indicated that the FPS Staffing Analysis Plan is currently in its final stage of approval at DHS and will soon be submitted to the Office of Management and Budget (OMB) for review. NPPD and FPS plan on implementing the plan after OMB review and final approval by the Secretary of DHS. Additionally, NPPD's comments indicated that FPS is optimistic that implementation of the plan will face fewer potential challenges than we envision in our analysis, and provided specific information on how FPS will address the six potential challenges enumerated in our briefing, including funding, data quality, performance measures, human capital planning, hiring processes, and training. NPPD's complete comments can be found in enclosure II.

Scope and Methodology

The results of FPS's staffing analysis have not yet been finalized, therefore we reviewed the methodology FPS is using to conduct its analysis, we identified commonly used workforce analysis and planning practices to determine if FPS incorporated them in its methodology, and we identified challenges that may impede implementation of FPS's workforce analysis. Additional information about our scope and methodology is provided in enclosure I. We conducted this performance audit from January 2010 to June 2010 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

We are sending copies of this report to interested congressional committees and the Director of the Federal Protective Service. In addition, the report is available at no charge on the GAO Web site at <http://www.gao.gov>. If you or your staffs have any questions about this report, please contact Mark L. Goldstein at (202) 512-2834 or goldsteinm@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report.

A handwritten signature in black ink, appearing to read 'M. Goldstein', with a long horizontal flourish extending to the right.

Mark L. Goldstein
Director, Physical Infrastructure Issues

Enclosures

Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts

**Briefing to the Subcommittees on
Homeland Security, Committees on
Appropriations, U.S. Senate and House of
Representatives**

**Preliminary Observations:
Federal Protective Service's Workforce Analysis Efforts
May 18, 2010**

Information provided in this briefing is based on preliminary observations.



Introduction

Introduction:

Federal Protective Service (FPS) is mandated to maintain a staffing level of at least 1,200 employees, and currently has a workforce of about 1,225 employees.

In June 2008 and July 2009 we recommended that FPS:

- develop and implement a strategic approach to manage its staffing resources that, among other things, determines the optimum number of employees needed to accomplish its facility protection mission, and
- take steps to develop a strategic human capital plan to better manage its workforce needs.

Objectives

The House Report which accompanied the Department of Homeland Security (DHS) fiscal year 2009 Appropriations Act mandated GAO to complete an analysis of the staffing resource levels required for FPS to be able to adequately protect federal facilities.

Based upon discussions with your staff, we agreed to the following objectives:

- (1) What is the current status of FPS's efforts to determine its workforce requirements?*
 - (2) To what extent do FPS's efforts align with commonly used workforce analysis and planning practices?*
 - (3) What, if any, challenges may impede implementation of FPS's efforts?*
-

Scope and Methodology

Scope and Methodology

- To evaluate FPS's staffing analysis methodology we:
 - reviewed documents provided by FPS officials, including its workforce analysis methodology, its current staffing allocation, and projected staffing key assumptions;
 - conducted interviews with FPS headquarters' officials;
 - conducted interviews with FPS Region 10 officials and inspectors in Federal Way, WA. (Officials in region 10 were selected because they were instrumental in the development of FPS's workforce analysis); and
 - conducted interviews with DHS's National Protection and Programs Directorate (NPPD) officials.
- We also met with officials from law enforcement entities with roles and responsibilities similar to FPS, such as protection of facilities, management of contract guards, and core law enforcement duties. These organizations included:
 - 5 federal organizations—U.S. Postal Inspection Service, U.S. Secret Service, Smithsonian Institution, AMTRAK, and U.S. Department of Veteran's Affairs.
 - 3 non-federal organizations—King County, WA, Sheriff's Office, University of Washington Police, and the St. Louis, MO, Police Department.

Scope and Methodology

Scope and Methodology

To identify security and law enforcement industry workforce planning practices we obtained documents—such as staffing studies and published journal articles—and conducted interviews with officials from several security and law enforcement organizations and academic experts, including:

- International Associations of Chiefs of Police (IACP),
- American Society for Industrial Security (ASIS),
- BCD Associates,
- Security Analysis and Risk Management Association (SARMA),
- Washington Association of Sheriffs and Police Chiefs (WASPC),
- National Law Enforcement Recruitment Association, and
- Michigan State School of Criminal Justice.

Additionally, we reviewed GAO reports addressing best practices on workforce planning and management.

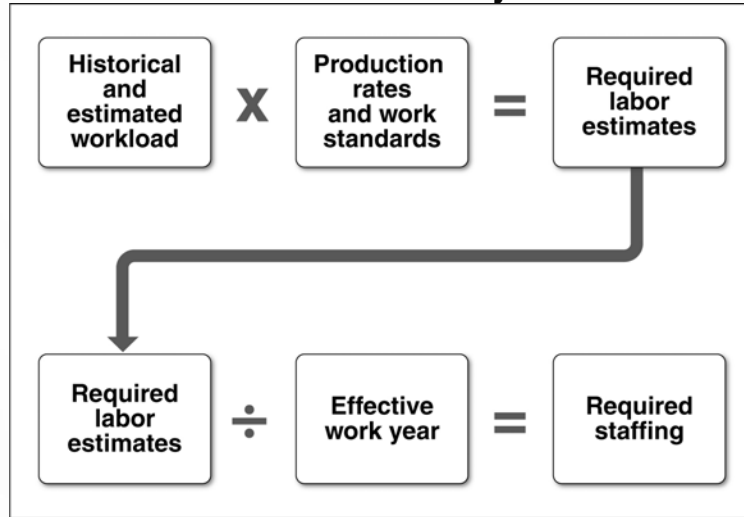
1) What is the current status of FPS's efforts to determine its workforce requirements?

FPS has taken steps to determine its workforce requirements, however, its workforce analysis plan is not finalized.

- FPS is using a model for determining optimal workforce size based on workload, risk, and work standard assumptions.
- As part of the FPS-NPPD transition plan, FPS stated it would "create a robust workforce staffing model that is scalable based on changes in risk, threat, and consequence." This model is intended to provide the basis for staffing recommendations in future budget requests.
- According to FPS officials, the model contains elements of staffing models used by other federal law enforcement agencies, including the U.S. Marshals Service and the Secret Service.

1) What is the current status of FPS's efforts to determine its workforce requirements?

FPS's Workforce Analysis Model



Source: FPS.

1) What is the current status of FPS's efforts to determine its workforce requirements?

FPS's Workforce Analysis Model Components:

Workload Data: Specific activities performed by FPS to ensure secure facilities and safe occupants. For example, for inspectors FPS used historical data and subject matter experts to determine how many hours were spent conducting Facility Security Assessments (FSA), attending Facility Committee Meetings, mandatory training, pre-lease surveys, among other activities.

Production Rates & Work Standards: The average hours required to complete each workload activity. For example, FPS based this on the frequency of specific activities such as FSAs and guard inspections, as required by federal regulation or agency standard operating procedures.

Labor Estimate: Total number of annual hours required to complete all work for a specific activity identified in analysis of workload data.

Effective Work Year: 2,080 hours per employee.

1) What is the current status of FPS's efforts to determine its workforce requirements?

FPS's Workforce Analysis Model Incorporates Some Risk Factors

In addition to workload analysis, facility risk are the primary data used in FPS's workload analysis, including:

- Number of facilities,
- Facility Security Levels,
- Number of security posts for each facility, and
- Number of contract guards per facility.

Additional Risk Factors:

- Geography (i.e., the protected asset's location as it relates to response time during an incident).
- DHS's Buffer Zone Protection Program study findings. This study is a DHS administered infrastructure protection grant program to help local law enforcement and first responders identify and mitigate vulnerabilities at the highest-risk critical infrastructure sites. A buffer zone is the area outside a facility that an adversary can use to conduct surveillance or launch an attack.
- Regional intelligence data.

1) What is the current status of FPS's efforts to determine its workforce requirements?

Current Status of FPS's Workforce Staffing Model:

According to NPPD officials, as of May 10, 2010, the FPS Workforce Staffing Plan is pre-decisional and there is no anticipated date for its finalization.

- In January 2010, FPS completed its workforce analysis plan and provided a draft to NPPD for review and comment.
- On May 7, 2010 NPPD completed its final review, and has submitted it to DHS for review.
- Once DHS's approval and consensus is reached, the plan will be sent to the Office of Management and Budget (OMB) for final approval before it is approved by the Secretary of DHS.

2) To what extent do FPS's efforts align with commonly used workforce analysis and planning practices?

FPS's staffing analysis methodology appears to incorporate commonly used industry practices and processes for conducting workforce analysis. For example, the methodology:

- Identifies risk level and quantity of facilities and posts to be secured or protected.
- Incorporates a workload analyses (identifying mission, tasks, and time to conduct activities).

We found there are no widely used established criteria, formulas, or standards for determining the size of law enforcement and physical security workforces. However, officials in most organizations we spoke with told us that budget ultimately drives staffing decisions and is the primary consideration when making these decisions.

3) What, if any, challenges may impede implementation of FPS's workforce analysis efforts?

FPS may face several potential challenges to implementing its workforce analysis plan:

- **Funding:** FPS charges federal agencies to fund its services, however, FPS officials have not told us how they intend to fund an increased staff size. FPS's security fee has increased over 100 percent since its transfer to DHS, and FPS customers are already concerned about cost and quality of security and in the past fee increases have been met with resistance from GSA and tenant agencies. Additionally, FPS did not request additional funding in its fiscal year 2011 budget.
- **Data Quality:** The accuracy of FPS's workload analysis is unclear due to the quality of workload data used. For example we have reported FPS does not accurately track key activities such as facility assessments and guard inspections. Additionally, with the implementation of a new automated risk assessment and management program, which may reduce the time it takes to conduct specific activities, the use of historical workload data may not be accurate.
- **Performance Measures:** FPS does not have metrics in place to measure how changes to its workforce size, composition, and allocation are addressing its operational challenges.

3) What, if any, challenges may impede implementation of FPS's workforce analysis efforts?

FPS may face several potential challenges to implementing its workforce analysis plan:

- Human Capital Planning – FPS has not developed a strategic human capital plan to aid in long-term workforce planning and management as GAO recommended.
- Hiring Processes – FPS recently experienced difficulties hiring and on-boarding about 180 inspectors, therefore it is unclear how it plans on managing the hiring of any additional staff that may be needed as a result of its workforce analysis plan. Additionally, FPS is no longer using Custom and Border Patrol's established human capital recruiting and hiring services. According to the transition plan, these services will be transferred to the Office of Personnel Management
- Training – Continued backlogs at the Federal Law Enforcement Training Center (FLETC) will impact FPS's ability to provide training to new staff—subsequently, some of the approximately 180 inspectors hired last year have yet to complete all required training.

Contact Information

If you or staff have any questions about this report, please contact Mark L. Goldstein at (202) 512-2834 or goldsteinm@gao.gov.

Key Contributors: Tammy Conquest, Assistant Director; Tida Barakat, and Jennifer Clayborne.

On the Web
Web site: <http://www.gao.gov/>

Contact
Chuck Young, Managing Director, Public Affairs, youngc1@gao.gov
(202) 512-4800, U.S. Government Accountability Office
441 G Street NW, Room 7149, Washington, D.C. 20548

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Comments from the Federal Protective Service

Office of the Under Secretary
National Protection and Programs Directorate
U.S. Department of Homeland Security
Washington, DC 20528



**Homeland
Security**

JUN 9 2010

Mark L. Goldstein
Director, Physical Infrastructure Issues
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Mr. Goldstein:

RE: GAO Briefing Slides (10-802R), *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts* (GAO Job Code 543258)

The National Protection and Programs Directorate (NPPD) appreciates the opportunity to review and comment on the U.S. Government Accountability Office's (GAO) briefing slides for the engagement referenced above.

This ongoing engagement is to review the NPPD Federal Protective Service (FPS) Staffing Analysis Plan (the Plan) and planning practices, and to identify challenges to its implementation. The Plan is in its final approval stage at the Department and will soon be submitted to the Office of Management and Budget (OMB) for review. NPPD/FPS will implement the Plan following OMB review and final approval by the Secretary of Homeland Security.

As indicated in the staffing analysis methodology provided to GAO, the Plan is based on models of similar agencies that used a structured set of basic calculations to estimate direct labor and staffing requirements. The Plan represents a strategic approach to determine the optimum number of employees needed to accomplish the FPS facility protection mission and the allocation of those resources based on the Department's risk management principles and FPS's goals and performance measures.

FPS leadership is optimistic that implementation of the Plan will face fewer potential challenges than the GAO envisions in its analysis. The Plan's development and review processes have afforded FPS a valuable opportunity to identify, analyze, and address anticipated challenges, including the six potential challenges enumerated in the GAO briefing materials: funding, data quality, performance measures, human capital planning, hiring processes, and training.

With respect to funding, funding levels and issues are discussed in the full Plan and will be made available to GAO upon final approval.

Mark L. Goldstein
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With respect to data quality, the foundation and integrity of the Plan rests on the quality of its data, and although the data has not been subjected to a rigorous scientific verification process, FPS has reviewed the processes used to collect and certify the data and believes it to be accurate, complete, and consistent with FPS mission essential functions and supporting tasks. Moreover, the Plan is undergoing rigorous Departmental review, which has enabled experts from several operational and administrative teams to provide their input and guidance as well. This bolsters our confidence that the Plan will be well considered and feasible.

With respect to performance measures, in addition to implementing policies to address operational challenges, FPS has developed more than 100 performance measures to include outcome measures, approximately 30 percent of which have already been implemented, as an initial test of the measure development and data collection processes. As additional technology systems are implemented, FPS will institute the appropriate associated measures.

In addition, the final Plan will indicate the impact that changes in FPS's workforce size and composition will have on operational capabilities. These changes, along with ongoing efforts to address challenges, will result in improvements in operational effectiveness and efficiency.

With respect to human capital planning, hiring processes, and training, FPS fully intends to finalize a human capital strategic plan after the staffing analysis is complete. We welcome any suggested best practices or sample plans that GAO would like to provide as exemplars. FPS and the NPPD Human Capital Office will collaborate to develop and employ a well defined and sound human capital strategy to recruit, train, allocate, and retain additional employees identified in the Plan.

Finally, FPS intends to implement the Plan incrementally, and allow for modifications if appropriate, which should help facilitate its smooth and effective implementation.

Again, we thank you for the opportunity to review the briefing materials.

Sincerely yours,



Rand Beers
Under Secretary

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