



DEPARTMENT OF THE TREASURY

WASHINGTON, D.C. 20220

March 30, 2001

OFFICE OF  
INSPECTOR GENERAL

MEMORANDUM FOR JAMES F. SLOAN  
ACTING UNDER SECRETARY (ENFORCEMENT)

FROM: Marla A. Freedman  
Assistant Inspector General For Audit

SUBJECT: OIG Study: Treasury Law Enforcement Workspace

We are pleased to provide our policy study, *Treasury Law Enforcement: Unique Workspaces Foster Safer and More Effective Operations*. During the study, we identified more than 50 Treasury space standards. Of these 50, we were able to define 20 as unique to Treasury law enforcement offices. As requested, we have provided broad perspectives on some of the optimal design features for each type of space.

We found that Treasury has in place a thorough set of standards for law enforcement workspace. The study identifies recurring anecdotal evidence of Treasury's need to fully implement these standards. However, during our study we were told consistently that the Department has not been able to adequately fund the standards' implementation. In the study, we offer 6 broad options Treasury can consider in allocating any additional funding for law enforcement workspace.

We have discussed a previous draft version of this study with officials of the Bureau of Alcohol, Tobacco and Firearms, U.S. Customs Service, Internal Revenue Service-Criminal Investigation, U.S. Secret Service, Financial Crimes Enforcement Network, and Federal Law Enforcement Training Center, and incorporated their comments where appropriate.

We hope you find this study useful and look forward to future projects with your office. If you have any questions or if we may offer further assistance, please contact me at (202) 927-5400, or have a member of your staff contact Adam Silverman, Director of Evaluations, at (202) 927-5766.

Attachment

March 30, 2001

OIG-CA-01-001

## Treasury Law Enforcement:

### Unique Workspaces Foster Safer And More Effective Operations



### Office of Inspector General The Department of the Treasury



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**D**etective Rowens had a dozen years on the force. She started in patrol and grew into significant undercover counter-narcotics work. On the day of her most recent promotion she learned of her assignment to a Treasury Task Force on International Money Laundering. She had heard of the task force's solid reputation earned by its more than 50 officers and looked forward to joining the team. The team's members come from:

- Alcohol, Tobacco and Firearms
- Customs Service
- Internal Revenue Service
- Secret Service
- Financial Crimes Enforcement Network
- Federal Law Enforcement Training Center
- State and city police departments.

Task force work had already led to indictments against 20 suspected smugglers and money launderers. More than 100 others were under investigation. Detective Rowens anticipated working with topnotch professionals in a state-of-the-art workspace.

Well, she was half-right! The team is fine. However, she arrived for her first day of work only to learn the workspace is not!

Far below Treasury standards, 50 officers crammed into an area designed for 25. It was so loud, the senior special agent had to raise his voice to explain the setup. Detective Rowens could see the agent was uneasy. He was proud of the 50 men and women under his command but he was embarrassed because some officers had spread their work across the floor due to a shortage of desks and computers.

The agents said they knew that if they could just implement published standards, their productivity would increase.

The vignette above and this report look at Treasury's unique space needs and some of the ways those needs impact law enforcement effectiveness and efficiency.



Officers working cases

## Unique Workspace Standards Exist

### Adequate Resources Would Allow Officers To Implement Standards

#### An Evaluator's Perspective

Often in government, we find ourselves criticizing the hard work and best intentions of others serving the citizens of the Nation. In our case, we serve the Department of the Treasury (Treasury) as Evaluators for the Office of Inspector General (OIG), Office of Evaluations (Evals). In this study, however, we found little to criticize. Instead, we observed that Treasury law enforcement's unique space standards were thoroughly outlined in published handbooks. We saw firsthand the successful work of officials to implement these standards at pilot locations across the country. We understand that deployment has been limited by resource shortages. In our work, we learned that improvements in efficiency and effectiveness that accompany modern workspaces come at a high financial resource cost. We were told that upgrading existing workspace for a medium-sized investigative office can cost several million dollars and that building out workspace from scratch can be very costly. Regardless of cost, our work suggests a genuine need for full implementation of Treasury's unique workspace standards at all of its law enforcement offices.



Typical federal office building

When the Treasury Under Secretary for Enforcement discussed with us plans to prepare a report on Treasury's law enforcement infrastructure at the request of the Congress, we viewed this as a positive step for the Department. We understood that if done right, it could help others understand the unique needs of investigators, inspectors, regulators, and protective service agents in Treasury's field offices. After the Under Secretary asked our office to assist with the study and focus on the issue of workspace, we viewed this as a chance to proactively study some of the challenges law enforcement officers face in the workplace.



File storage space

Initially, we decided to outline Treasury's unique space standards in a series of matrixed tables. We soon realized that the bureaus had already established solid workspace standards on a series of interrelated matrixed tables. As a result, we shifted our deliverable from a set of matrices to a categorized description and photograph of each space standard followed by our collective perspective on each standard and of the category. When this perspective reflects a concern over inadequate construction, layout, or location, we list the concern. And when this perspective reflects an ideal approach, we describe the approach. We believe this study, though brief, supports Treasury's case for the benefits of specific types of space and identifies some opportunities to make efficient use of any additional resources provided.



Historical Customhouse

We reviewed Treasury's unique law enforcement workspace standards. More than 50 different space standards exist. However, of the 50 or more standards, we believe that 20 can be described as unique to the needs of Treasury law enforcement. The other 30 or more standards cover non-unique space, or space you might find in any office, such as bathrooms, hallways, and rooms for photocopiers, office supplies, and cleaning equipment, etc.

- Secure Reception Area
- Case Document Work Area
- Processing Area
- Staging Area
- Break Area
- Kennel Space
- Laboratory
- X-ray Area

- Task Force Workspace
- Joint Staging Area
- Physical and Defensive Tactics Training Space
- Weapons Qualifications Range
- Video Conference Facility

- Administrative File Storage
- Grand Jury File Storage
- Evidence Storage
- Weapons and Ammunition
- Computer/Communications
- Technical/Computer Forensics Room
- Parking

We focused our analytical work on the 20 unique standards (listed to the left), that we further grouped into three categories (listed below):

- **Single Use Space** applies to some very specific functions unique to a law enforcement environment.
- **Shared Space** covers common and often multifunctional spaces.
- **Storage and Parking** are used to house equipment, training materials, firearms, case information and evidence, etc. Parking covers storage space for government-owned general and special purpose vehicles.



Single Use Space



Shared Space



Storage and Parking



The Capitol Building

### The Study's Origin

In House Resolution (HR) 106-231 and HR 106-756, members of the Treasury, Postal Service, and General Government Subcommittee of the House Committee on Appropriations expressed their continued support for the critical role Treasury law enforcement plays in protecting the integrity of our Nation's borders, its financial institutions, and the physical protection of its leaders. The Subcommittee noted the importance of adequate funding for Treasury law enforcement and of recruiting and retaining a professional workforce.

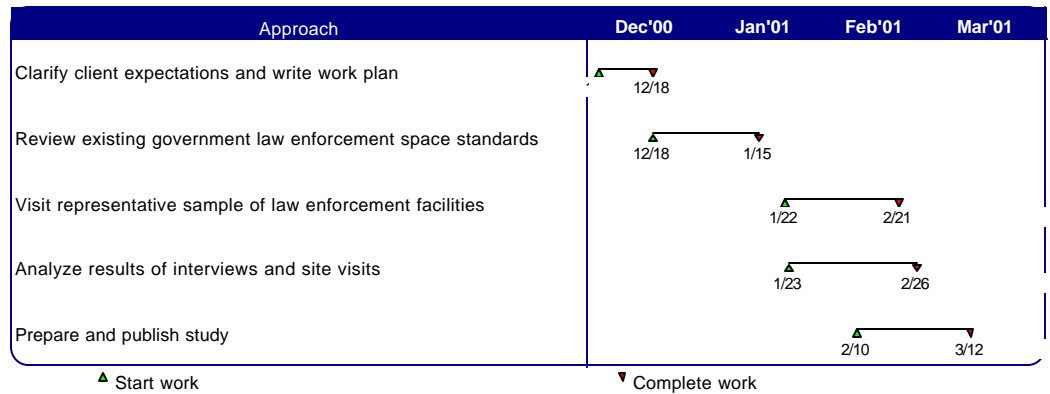
Treasury was asked to prepare a study on overall Treasury law enforcement requirements so the Congress would be better able to authorize adequate funding and staffing. The overall Treasury-wide study will address funding requirements, hiring authority, personnel compensation, overtime practices, training, workspace, and other areas critical to meeting the varied missions of Treasury law enforcement. We understand Treasury staff has consulted with the House Committee on Appropriations to determine the breadth of this study in preparation for submitting a final report.



A Treasury bureau command center

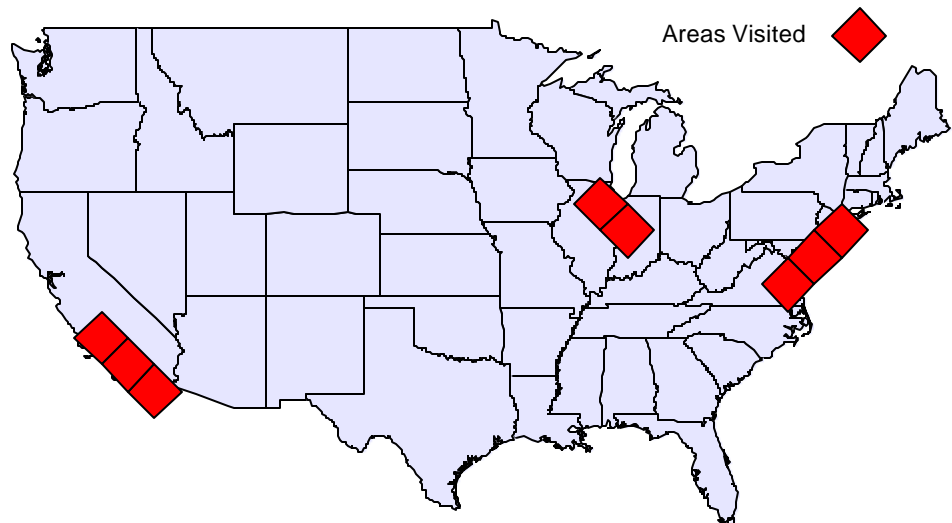
## OIG Evals Approach

We conducted our study between December 2000 and February 2001 following the President's Council on Integrity and Efficiency Quality Standards.



Initially we coordinated our work with officials from the Treasury Office of Enforcement. Thereafter, we met with key operational leaders at the Bureau of Alcohol, Tobacco and Firearms (ATF), Customs Service (USCS), Internal Revenue Service—Criminal Investigation (IRS-CI), Secret Service (USSS), Financial Crimes Enforcement Network (FinCEN), and Federal Law Enforcement Training Center (FLETC). We visited 50 offices in three regions of the country offering representative exposure to most types of Treasury law enforcement operations and workspaces.

We compared each set of bureau workspace standards with the environments observed



during our visits. Some of the workspaces were built precisely to Treasury standards. Others were not. When spaces followed the existing standards, we witnessed good communication, higher levels of morale, better management controls, and more effective and efficient orientation of work functions.



½ height cubicle workspace

However, when offices weren't able to follow the published standards, managers seemed burdened by a large and growing set of challenges and told us that the levels of morale in these offices suffered. Most importantly, the lack of standard workspace resulted in partial or nonexistent administrative and operational management controls. We observed instances where the lack of implemented security standards endangers Treasury law enforcement officers, cooperating informants and witnesses on-site to be interviewed, and suspects detained in the offices.

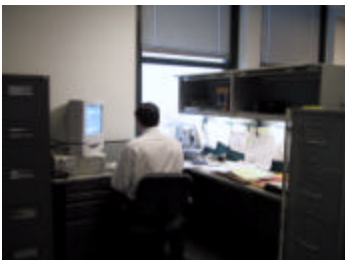
During our study, we asked Treasury officials why some law enforcement workspaces did not meet existing standards. In all cases, bureau representatives explained their need for additional funding and streamlined General Services Administration guidelines to build smarter and safer workspaces.



Interim computer forensics workspace

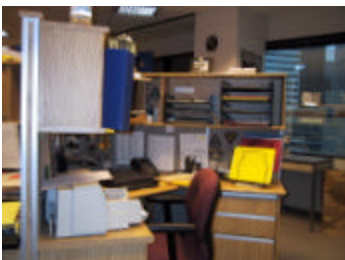
For this study, we do not cover individual office workspace beyond this paragraph of the report because Treasury's standards and the views of senior law enforcement leaders across the country vary greatly. We found standards in place, as well as supporters and detractors, for open bay/exposed desks, open bay/ ½ height cubicles, open bay/ ¾ height cubicles, open bay full height cubicles, squad offices, four person offices, two person offices, and individual offices.

At the beginning of our study, we anticipated that officers' preferences and justifications for individual office workspace were consistently based solely on objective criteria and need, but this is not the case. Published standards wisely offer senior managers the flexibility to choose the kind of individual office workspace assigned to officers. Decision-makers' personal work experiences and opinions of effective and ineffective individual office workspaces, contrasted with the amount of time officers spend at their desks, often determines the type of individual office workspace established.



Individual workspace

In the majority of offices, we understand it is career officials in very unique law enforcement cultures making educated and subjective decisions on the environment in which their people work. For efficiency sake, we wish a single and optimal standard could be identified for individual workspace across Treasury, but believe it cannot be done. Non-individual workspace is more easily adaptable to a definable standard. Descriptions of these types of spaces organized into the three categories of single use space, shared space, and storage and parking follow.



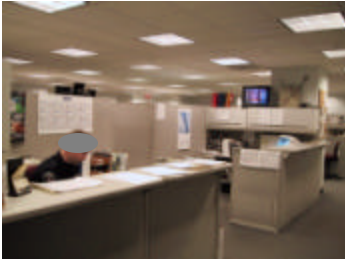
Individual cubicle



Cubicle office space



Hallway lined by individual offices



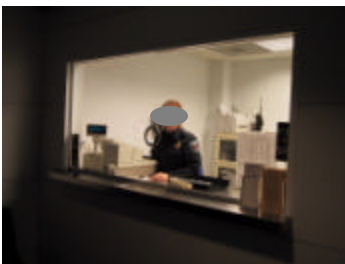
Reception area just past secure entryway

## Single Use Space

### The most focused set of space ‘tools’ an officer has to leverage

The ranks of Treasury law enforcement officers include criminal investigators/special agents and inspectors/operational regulators. Each has specific needs for single use space. In visiting 50 offices and examining published draft and final space standards and other policy documents, we found Treasury has published standards in place for eight different single use space categories:

- Secure Reception Area
- Case Document Work Area
- Processing Area
- Staging Area
- Break Area
- Kennel Space
- Laboratory
- X-ray Area



Secure reception area

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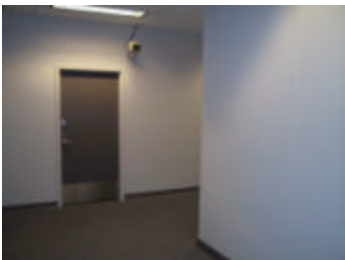
### Secure Reception Area

*A separate controlled entryway to an office space for cooperating informants, witnesses, general visitors, deliveries, and in some cases suspects, that allows individuals to enter without coming in contact with other staff*

With a typical reception area averaging 150 - 200 square feet in size, this room prevents potentially dangerous people from entering the workspace without officers' knowledge. A well-designed room has at least two monitored doors leading into the workspace. One door can access general workspace near a receptionist-monitor's desk. The second can access a secure room where officers can process individuals without revealing the identities of other officers on duty and operations underway. Ideally, officers have access to a keyed elevator that opens near the reception area or directly into the processing area for cooperating informants, witnesses, and suspects.

A well-constructed room has penetration-resistant walls from floor-slab-to-ceiling-slab, a bullet resistant transaction window, a doorbell and intercom, a telephone outlet, easy public access, high-security locks, electric-strike door releases, and in some cases non-public elevator access.

In 15 out of 50 cases, we observed shortcuts taken on reception areas which could endanger all in the workspace. The lack of a reception area, or a poorly constructed one (with weak walls, windows, or doors) is an invitation for tragedy. Also, the widespread use of public elevators by cooperating informants, witnesses, and suspects prevents necessary discretion and confidentiality.



Door with camera outside secure reception area

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### Case Document Work Area

*Access-controlled individual workspace where officers can work on grand jury case information*

In describing inadequate space an agent stated, "Our job entails the seizing and review of documents, often the day-to-day records of an active business. Search warrants sometimes require us to take possession of dozens of cabinets full of these kinds of records. We usually find appropriate space to store them, but often lack the space to



Overcrowded and inadequate case document work area



Case document controlled work area

examine them in accordance with proper evidentiary procedures. Without this kind of workspace, we end up spending an hour each morning unpacking the secured documents and an hour each evening packing and securely storing the records."

Treasury standards for law enforcement workspace outline the sizes, uses, and construction requirements for secure storage rooms. Usually, officers find space in these rooms for case document work areas. For offices handling paper intensive-cases, groups of rooms or caged areas with more than 1,000 square feet per 50 or more officers exist in some offices.

The standards for case document work areas are rigorous because of the need to house or review sensitive grand jury case information. Slab-to-slab construction, wire mesh reinforced walls, solid doors, and alarms are required. However, the cost to construct this secure space has prevented Treasury from building this type of space in the majority of offices.



Staging area converted into case document work area

Of 50 offices visited, we observed only 7 with an area where documents can be left spread out and secured after hours (the preferred approach). At 15 locations, officers cleverly store reams of paper files inside of wheeled cages that they can secure with their own locks. Often these officers end up commandeering other types of space, such as storage facilities, local area computer network closets, evidence vaults, and conference rooms.

### Processing Area

*A secure place to interview, process, and safely hold cooperating informants, witnesses, applicants, and suspects*

The standards for rooms in this category vary in size depending on purpose:

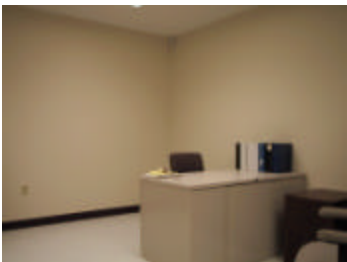
- Interview, 120-150 square feet
- Polygraph, 100-125 square feet
- Processing, 125-150 square feet
- Holding, 60-100 square feet
- Fingerprint, 70-100 square feet

Depending on bureau policy, modification of these rooms can satisfy most processing area needs. Optimally, officers can secure the area separate from the general workspace. Having shatterproof one-way glass or remotely monitored ceiling-mounted cameras enhances safety in the processing area. Adequate soundproofing, visual isolation, and lighting makes the rooms appropriate for polygraphs and interviews. Ideally, panic alarm buttons that identify their location, located in all processing areas offers emergency protection if needed. Rooms large enough to accommodate the latest in automated fingerprint technology make routine processing more efficient.



Interview room with secure elevator access and lit "in use" sign

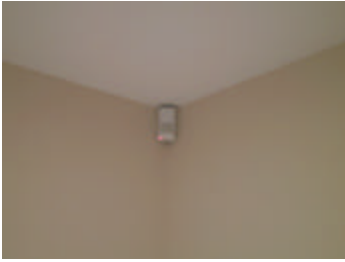
To safely secure suspects, a room with slab-to-slab wire mesh-encased walls; solid core, steel framed, outward-opening, dead-bolt doors with non-removable steel hinge pins; secure ceilings; protected light fixtures; contaminant-removing ventilation; a solid attached bench; a floor drain for easy cleaning; and/or an eyebolt or bar for attaching handcuffs is best. Also for safety reasons, a bathroom in the processing area limits a suspect's exposure to officers, cooperating informants, and the general public.



Soundproof interview room

In 12 of the 50 offices visited, we found that the processing areas did not have a bathroom. As a result, officers take suspects into public areas to use public restrooms.





Motion detector for remote monitoring of processing area

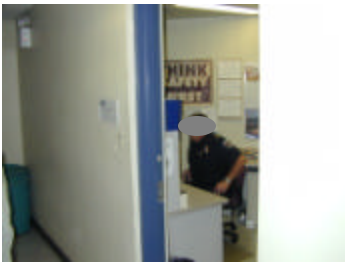
Also, we observed that shortcuts in processing rooms have resulted in their location in the middle of special agents' workspace or completely away from any officer supervision. In a few cases, limited construction has resulted in holding rooms from which even an amateur can escape.

In the case of holding rooms, officers' dependence on internal bureau space varies. Some use the space regularly because it allows greater control over a suspect. Others prefer to use local police department or other Federal government agencies' facilities for their convenience. In several instances, we observed that individual workspace shortages resulted in the conversion of holding rooms into offices.

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### Staging Area

*Internal operationally secure place for all officers and support staff to meet in preparation for an operation – always located within a bureau's individual workspace, often serves as meeting, training, command center, and press briefing space*



Holding room converted into an individual office

When properly outfitted, staging areas have local area computer network and telecommunications outlets for voice and data communications with drop down integrated audiovisual features. Optimally, this area has easy access from the reception area to prevent visitors from wandering into the general workspace.

Almost every staging area we observed during the study could only accommodate 50 percent of the on-site workforce. Very rarely can existing space accommodate other participating federal, state, and local law enforcement officers. Actual sizes vary from 150 square feet to several thousand square feet.

While officers use staging area space for operations preparation, meetings, classes, and briefings, they also use it as an appropriate coordination point for federal, state, and local officers to improve cooperation on joint or overlapping cases. Ironically, we noted that the staging area is often the first space converted into individual workspace if the need arises.

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### Break Area

*Informal place for employees to eat meals, take short breaks, and conduct meetings*



Staging area

Law enforcement officers often work long and unusual hours in places without easy access to restaurants. Also, they sometimes have to remain on-site to monitor suspects. Varying in size from 50 to 2,500 square feet, an easily accessible break area can mean the difference between an officer having or not having access to food during work hours.

Properly outfitted, a break area has at a minimum, a sink, hot and cold running water, storage cabinets, a ground fault interruptible electrical outlet above a counter for a microwave oven and another outlet next to a counter for a refrigerator.

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### Kennel Space

*Secure sanitary area for kenneling canines that detect narcotics, explosives, and currency*



Kennel converted for outside storage

Satisfying this very unique workspace need often requires the use of local private facilities. When adequate, these private locations can well serve officers' needs for a



Properly housed kennel

safe, accessible, and clean area to house a dog overnight. Optimally, a facility offers each dog a minimum of 50 square feet of space, has an area for designated washers and dryers to wash training devices, and provides adequate ventilation of contaminants.

We were told that the quality of kennels varies greatly across Treasury due to shortages in resources. When properly funded, officers have constructed large, safe, and sanitary rooms to properly house their working dogs.

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### Laboratory

*Workspace for focused scientific research and analytical work*

Labs at all Treasury law enforcement bureaus have a vital role at Treasury. Officers rely on lab scientists for their expertise in a variety of areas, including fingerprint analysis, chemical composition of paper and inks, handwriting authenticity verification, country of origin determination, textiles construction studies, computer forensics, explosives composition, weapons use, currency and coinage, and now Internet and cyber-crimes.



Mobile Laboratory

A limited review of Treasury laboratories revealed the importance of each and the significant Treasury expenditures committed to creating a professional environment crucial to recruiting and retaining qualified applicants, and conducting credible case research.

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### X-ray Area

*Secure operational storage space for X-ray equipment*

X-ray equipment in use at Treasury varies greatly in size and function, and has different power and environmental requirements. Some devices measure just 5 feet by 10 feet, while others require a space that can accommodate a large tractor-trailer. Officers use low energy X-ray equipment to search for smuggled items hidden on people at airports and land border crossings. High-energy X-ray equipment can identify illegal cargo in luggage, mailed packages, shipping containers, and vehicles. In rare cases, medical doctors may use traditional medical X-ray equipment to help save the life of a person suspected of smuggling illegal drugs inside their body.

Treasury officers have found adequate spaces to store X-ray equipment. However, we observed an instance where non-Treasury-owned equipment was not being used because of space and timing concerns.

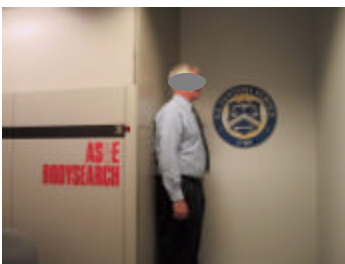


Mobile truck cargo exam unit requiring a lot of space

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### An Evaluator's Perspective

In initiating our work on this policy study, we asked a series of questions to determine if Treasury law enforcement officers have unique workspace needs. After reviewing the answers to our questions, and reviewing General Services Administration policy documents, Occupational Safety and Health Administration guidance, and published Treasury bureau space standards, we believe the answer is, 'yes'. In meetings with key Treasury officials, and through our visits to operational field offices, we further confirmed the 'yes' answer.



Traveler participating in an optional low energy X-ray



Specifically in the area of single use space, Treasury bureaus have developed applicable and sufficient standards. Designed to accommodate and facilitate specific operational functions, these standards serve genuine existing work needs. Without single use space, in one form or another, officers might not be able to do their jobs well.

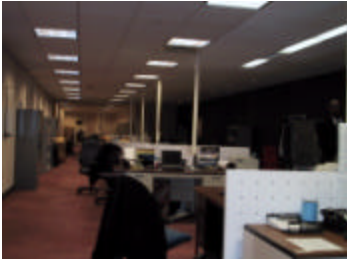
Treasury's single use workspace in 45 of 50 locations visited does not meet existing space standards. In these 45 locations, we found that Treasury officers make do with far less than the established standards. However, all evidence leads us to believe that key law enforcement officers and senior Treasury administrative officials have moved aggressively to implement Treasury space standards when financial resources have allowed.



The challenges of implementing safe, effective and efficient law enforcement workspace standards are outweighed by the limits of Treasury's annual budget appropriation. Our study suggests that the implementation of Treasury workspace standards will require significant increases in resources for the specific purpose of enhancing Treasury's law enforcement infrastructure. We have listed opportunities for efficient use of additional resources to provide this and other necessary space to officers on page 20.

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Open bay task force workspace

## Shared Workspace

### An area with potential for the greatest return on investment

Often in today's work environment, people are challenged to do more with less while emphasizing maximum levels of productivity. Shared workspace may be the solution to this challenge! We found Treasury has published standards in place for five different shared workspace categories. Each category of space offers opportunities to improve law enforcement operations and build a better Treasury:

- Task Force Workspace
- Weapons Qualifications Range
- Joint Staging Area
- Video Conferencing Facility
- Physical/Defensive Tactics Training Area



Full height cubicle task force workspace

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### Task Force Workspace

*Individual and squad workspace shared by cooperating federal, state, and local law enforcement agencies for joint casework*

Treasury law enforcement officers regularly combine their expertise in different programs and form joint operational task forces housed in 100 to 3,000 square feet of workspace. While each task force participant can expect as much as 150 square feet or no space at all, 50 square feet per person is about average. Task force participants often invite officers from other federal agencies, and state and local police departments to join in their efforts.



Open bay task force workspace

While Treasury officials generally know the kinds of specially trained officers they prefer on a task force, they usually don't know how long a task force will exist. The nature of the law enforcement work is unpredictable. It is commonplace for officers to form a joint task force on little or no notice in a proactive response to an unpredicted problem. These unanticipated challenges make it difficult for Treasury to request appropriated resources to adequately house and equip most task forces years in advance as the appropriations process requires.

When a Federal government agency forms a joint task force, traditionally the lead agency provides the workspace and equips all task force members. However, at Treasury this usually happens within the confines of existing bureau space. Rarely do the bureaus receive additional funding resources to accommodate the required workspace for all of the members of a task force. They must fund task force space, parking, and even phone bills out of their existing appropriation. At times, state and local police departments provide some funding to compensate for their officers' participation, but this is not the norm. For example, one Treasury bureau houses a task force with more than 200 members in its existing space. While each officer only has about 20 square feet of workspace, the task force leader has asked for additional space for 25-50 new officers. He makes a case that there is enough work for a hundred new officers. In another example, they've run out of space for task force officers working to interdict illegal drugs coming from known source countries.



Task force meeting in office space because they lack a staging area



Joint staging area

We were told Treasury is not currently able to fund space for what is probably the most effective use of modern law enforcement officers. Joint task forces combine the best and brightest officers with different specialties from all sectors of the community for impressive results. However, the space the officers with these elite groups share is often designed for far fewer people with a much simpler mission than that of a task force.

Of the hundreds of Treasury law enforcement officers interviewed during this study, about half told us they are frustrated by the lack of adequate task force workspaces. When government space is unavailable, some have resorted to renting hotel rooms on a short-term basis to stage for operations, an operational security risk most officers find less than desirable when discussing case-specific information. Treasury would benefit from a central fund, specifically for task forces, to cover their often-unpredictable costs.

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### Joint Staging Area

*External operationally secure place for officers and support staff from Law Enforcement bureaus to meet in preparation for an operation – in addition to individual bureau staging area space, often serves as meeting, training, command center, and press briefing space*

An obvious need for external or shared staging space exists. Officers already take advantage of other local Treasury and Federal government agency space, and also state and local police department and government facilities, to complete their missions. Not all officers want to share workspace, but all agree there is a shortage of joint staging area space. In light of the rental costs and lengthy space requisition process, the advantages of Treasury centrally renting and assigning a larger and more accommodating space seems a prudent and logical use of resources.



Joint staging area

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### Physical/Defensive Tactics Training Area

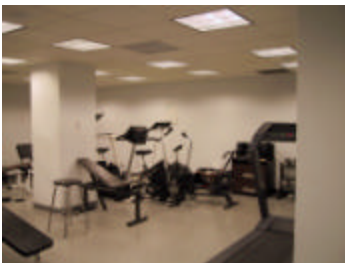
*Conveniently located facility where officers can satisfy Treasury physical and defensive tactics training requirements*

The U.S. Office of Personnel Management general medical requirements for physical fitness at the time of appointment requires officers to stay in shape. Treasury guidelines allow officers a few hours of work time each week to exercise. Individual offices have addressed the need for physical training areas in different ways. Some use existing shared building facilities or buy memberships at a local health club. Others build small and large in-house workout rooms with treadmills, exercise bikes, and weightlifting equipment. Yet others provided no options at all.

At some bureaus, officers also train regularly in defensive tactics. For this physically engaging training, officers use bulky and heavy protective body and facial pads, defensive tools, and floor mats. In most cases, officers store these defensive training aids in storage rooms in their main offices, and as needed, load them onto carts, into elevators, and onto vans to take them to an off-site gymnasium for practice. A better alternative would be storage of the training aids at a gymnasium or workout facility.



Crowded physical training room also used for file storage



Ideal physical and defensive tactics training area



Ideal Weapons qualification range

A case can be made for providing shared physical and/or defensive tactics training areas. Optimally, these facilities would be large enough to accommodate local and visiting officers, have quality fitness equipment, locked storage rooms for training aids, adequate numbers of showers, and lockable lockers. Importantly, locating these areas at or near officers' work locations would allow for their frequent use, while at the same time allowing for quick officer responses to requests from their offices.

### **Weapons Qualification Ranges**

*Safe and convenient place for each gun-carrying officer to fire and qualify with all service weapons at least once every three months*

Each of Treasury's 19,000 gun-carrying officers needs to fire and qualify with his or her service weapon(s) at a safe and secure range four times a year. Each qualification takes an officer 4 – 8 hours. Based on this, we estimate officers spend 300,000 – 600,000 hours each year collectively to qualify with their weapons. However, because Treasury lacks convenient ranges in some places, we estimate support staff work more than 200,000 additional hours trying to find enough range space for their officers to qualify. Also, we estimate officers spend hundreds of thousands of hours travelling to remote ranges each year.



Officer qualifying with government issued weapon

This much time is spent by this many people because more often than not, Treasury must arrange and pay fees for firing times at other federal (civil and military), state, and local government ranges as far as a year in advance. Often though, range owners bump Treasury officers from their time slots, sometimes with little notice, to allow for their own officers to fire. With ranges located up to several hours drive away, officers may spend three days each quarter to meet basic weapons qualifications. Officers' stories of half-day drives to cancelled range times abound. In some cases, private ranges are rented.



Existing military ranges offer convenience and flexibility for officers. An advantage to military range use is that it is often free of charge. However, in major metropolitan areas, where most officers are stationed, there are few convenient military bases. In these cases, the ideal solution would be the construction of shared Treasury-managed ranges at central locations. For example, at one location, 700 officers share a new five-lane indoor range located in their main office space basement.

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The requests for additional ranges have not gone unheard by members of Congress. Congress has played an important part in the development of facilities for firearms training in the Washington, D.C. metropolitan area. These new central facilities will have outdoor and enclosed indoor firing ranges.

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### **Video Conference Facility**

*A separate place containing necessary video and audio equipment to accommodate a work group*

Crime and criminal organizations cover ever-widening areas and cross countries' boundaries. Planning enforcement activities against these widespread threats often requires Treasury law enforcement officers to travel to remote locations to share information. As a tool for communication, video conferencing can more easily link officers at different locations so all may participate proactively in operations while reducing the amount of time officers spend traveling. In fact, one Treasury office has nearly 800 square feet of space dedicated to video conferencing in one location to support its international law enforcement mission. More shared facilities in centralized locations could help all of Treasury's law enforcement activities.

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### **An Evaluator's Perspective**

In 40 of the 50 Treasury offices we visited, we observed what seems to be a dramatic need for additional task force workspaces, case document work areas, joint staging areas, physical and/or defensive tactics training spaces, and/or weapons qualifications ranges. While Treasury standards do exist for some of these needs, most are considered on a case by case basis. Treasury has received little funding for shared space.

If resources were endless, we could confidently recommend providing each type of shared space to every individual Treasury law enforcement bureau and office. However, we understand the limits on resources. With these limits in mind, we have listed opportunities for efficient use of additional resources to provide this and other necessary space to officers on page 20.

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Video Conference Seating



Overflow administrative file storage in hallway



Overflow storage in outside bin exposed to elements



Ideal file storage solution



Grand jury file storage

## Storage and Parking

### Probably federal law enforcement’s greatest challenge

Treasury's law enforcement officers have the same office space storage requirements that exist for standard Federal government offices. This includes space for office supplies, work files, computer equipment, communications equipment, etc. In addition, officers have unique storage requirements to support a very broad strategic mission of safeguarding U.S. financial systems, protecting the Nation's leaders, and securing a safe and drug-free America. These unique storage requirements include space for different items including huge quantities of grand jury evidentiary and supporting case files, evidence from crimes, seized illegal narcotics and contraband, weapons, ammunition, detained property, and sensitive law enforcement information.

Also, Treasury needs to store vehicles including assigned government cars, oversized command centers and bomb investigative trucks, undercover vans, and hardened protective limousines. These government vehicles may contain sensitive and expensive communications equipment, special use or surveillance technology, weapons, and protective gear.

The seven space standards covered in this section include:

- Administrative File Storage
- Grand Jury File Storage
- Evidence Storage
- Weapons And Ammunition
- Computer And Communications
- Technical/Computer Forensics Room
- Parking

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### Administrative File Storage

*Room or area collocated in or near general office space to maintain records that are not evidence for an active or closed Treasury or grand jury investigation*

Treasury standards for administrative file storage vary. For most small offices, 100 – 200 square feet of space is standard. However, larger offices require much more space, with most offices consuming as much 1,500 square feet. Often the lack of storage space results in stacks of boxed files that officers place in offices, hallways, and even holding or interview rooms. During our review, we were told that that every piece of office space is “eventually fair game” for storing excess administrative files until they can be archived. Additionally, as offices grow, they don’t necessarily receive extra storage space for administrative files, further worsening the situation.

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### Grand Jury File Storage

*Space to store grand jury files*

Convening Federal courts swear in grand jury members for up to 18 months. The members review evidence to decide if a government prosecuting attorney has enough evidence to charge someone with a crime. Evidentiary case files in a grand jury space have special storage requirements because the law requires absolute secrecy to preserve the confidentiality and privacy of witnesses and suspects. To protect the chain





Evidence room

of custody of the files, the law requires their separate storage from other Treasury case files. Grand jury investigations almost always involve 10 to 20 times as many documents requiring storage than routine cases. Average cases involve 10 – 50 file drawer-size boxes of files. Some cases include hundreds of boxes.

A properly constructed grand jury file storage room has slab-to-slab walls with steel wire mesh in the core area (area between two layers of drywall) and a steel entry door with deadbolt lock set, if the room is not located in the secure storage room. One official said a general guide could be 10 - 20 square feet for each person working on the grand jury. In addition, enough grand jury storage space is required to secure the files for 7 to 10 years after the case trials are completed.

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### Evidence storage

*Space to store evidence for investigation or inspection cases*

Treasury officers take possession of criminal evidence regularly. Properly storing this evidence remains a priority in every office. Evidence storage rooms range in size from 100 to 1000 square feet with the need for spaces towards the larger size evident at 21 of the 50 offices we visited. Ideally, evidence rooms have enough space for storing evidence for a single unit's cases. To properly secure the evidence of different units, and maintain chain of custody over evidence, an office can separately access space within an evidence storage room.

Optimal construction of an evidence room includes walls constructed slab-to-slab of drywall with steel wire mesh in the core, a steel door with deadbolt lock, and electronic motion sensor and entryway alarms.

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### Weapons and Ammunition

*Safe and secure area for government-owned, non-issued weapons, ammunition, and equipment*

With more than 19,000 Treasury officers certified to carry firearms, standards exist for securing officers' long guns, automatic weapons, and certain pieces of tactical operational equipment in weapons storage rooms when not in use. Within the room separate safes can store weapons and sensitive equipment, and if possible, ammunition. Personal firearm or office safes can store individuals' issued weapons if necessary. Previously described, as in evidence storage, optimal construction requirements apply to this space as well.

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### Computer and Communications

*Secure, climate-controlled space for active computer servers, telephone equipment, and wireless communications base units*

Local Area Network and Wide Area Network computer servers and telephone and radio communications equipment warrant investment in special accommodations in today's workspaces. Rooms to house this equipment vary greatly in size, but 150 square feet seems ideal as long as the room has separate heating, air conditioning, and ventilation systems. Temperatures and relative humidity must be controlled at proper levels to cool the heat generated by the electronic equipment. Optimally, computer and



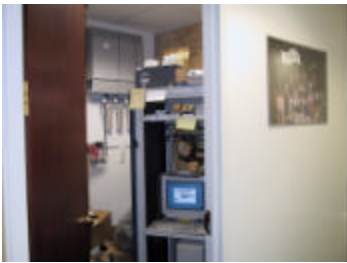
Co-mingling of evidence room material



Evidence



Unsecured and exposed communications wiring



Well-designed computer Local Area Network room

communications rooms only contain these types of equipment and have raised floors for wiring and flood protection, and a sufficient power supply with enough electrical outlets. These rooms benefit from the same kinds of secure construction used in evidence and weapons storage rooms.

### Technical/Computer Forensics Room

*A variety of different rooms for disassembling and analyzing computers, preparing and repairing special tracking and monitoring devices, and monitoring court-ordered telephone information.*

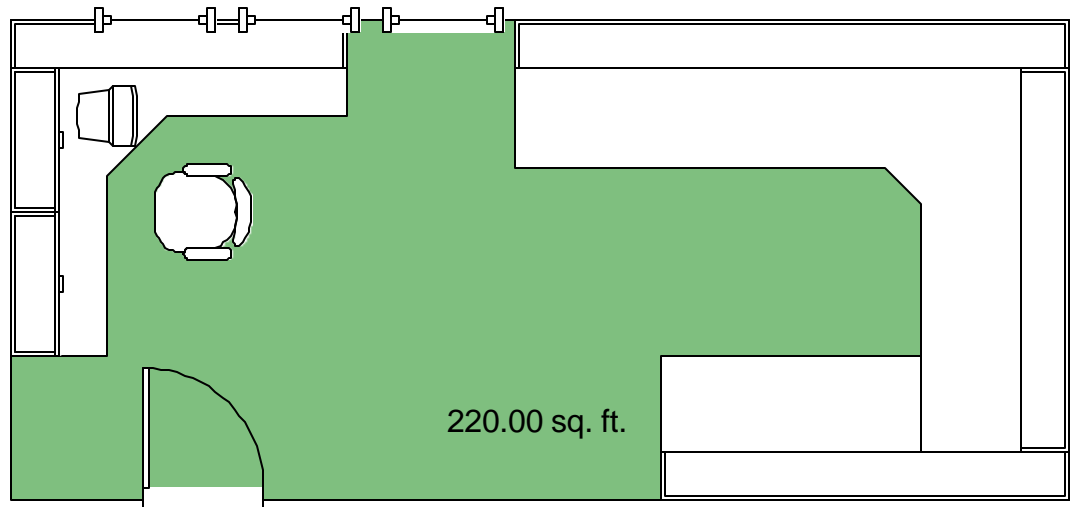
Also benefiting from the same kinds of secure construction used in evidence and weapons storage rooms, tech rooms have a need for separate heating, air conditioning, and ventilation systems. Electric outlets for equipment and standard workspace lighting round out space requirements.

Officers working in tech rooms require separate spaces for working with and storing equipment. In these rooms, much diagnostic equipment is set up and ready-to-use with all of the necessary connections in place. A separate work bench area is necessary for the operational storage of expensive equipment for diagnosing problems with very sophisticated technologies.

In a rapidly growing field, Computer Forensics, officers disassemble and analyze the components of a computer and computer accessories to collect evidence for cases. Every Treasury law enforcement office now uses this emerging law enforcement tool. Of



New and optimal computer forensics workspace



Inadequate computer forensics workspace

the 50 offices visited, we observed the construction of proper workspace with counters, shelves, and cabinets for this purpose at six offices. Officers house their analytical computers and equipment in space like the blueprint above shows. However, almost none have adequate space for the piles of evidentiary computers that come with the function.

Computers obtained as evidence require storage in an evidence room located somewhere in the vicinity of the forensics area. With this field in its infancy, officers told us they expect the computer forensics function to increase several-fold in the next 10 years.



Crowded technical room for preparing monitoring devices



Mobile X-ray system examining oversized cargo container

## Parking

*Secure and discreet space to store and/or maintain individuals' government-issued vehicles, frequently used functional vehicles for daily operations, and less frequently used special purpose and oversized vehicles*

We estimate that Treasury law enforcement has more than 8,000 vehicles in its inventory. All of these basic and protection cars; transport, surveillance, and X-ray vans; boats; helicopters; airplanes; oversized trucks and mobile command and control centers; and specialized means of transportation require parking. Because of the operational use of these vehicles and the expensive and sensitive equipment maintained and carried in them, all vehicles warrant a secure and discreet storage place whenever possible on-site or in close proximity for prompt response time. In addition, other federal agencies, and state and local police departments and government officials frequently visit Treasury law enforcement workspaces. Optimally, Treasury should accommodate these visitors' vehicles in secure and discreet parking spaces as well.



Secured parking for government-owned vehicles

Unsecured vehicles in non-discreet locations invite vandalism and theft. More importantly, this practice can prevent common sense operational security. For example, in the current environment, criminals often monitor exposed parking lots as officers lead suspects and carry seized drugs and illegal proceeds several blocks from their cars to their offices. In some cases, criminal informants monitor unmarked surveillance vehicles parked at remote garages to identify the undercover officers that drive them. This exposes Treasury officers unnecessarily to tremendous danger.

Optimally, proper parking facilities separate government-owned vehicles from privately-owned ones. They have controlled access with a secure gate, high walls or solid fencing to keep unauthorized people from entering or viewing the vehicles and their drivers, security guards and/or remotely monitored surveillance cameras and alarms. Convenient and discreet parking areas that can accommodate Treasury vehicles and official law enforcement and government visitors to an office benefit officers greatly.



Emergency response vehicle and officers

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## An Evaluator's Perspective

The bureaus need additional storage because these needs increase proportionately with the number of Treasury law enforcement personnel. Also as law enforcement work involving increasing amounts of data and information expands, the need for more storage will increase. We observed three types of storage space. The first is for immediate and continual access by Treasury's law enforcement officers in their work locations. This storage space must be secure and located at officers' work locations. The second is for items not requiring immediate access, such as non-current administrative materials and evidence for completed investigations. The third is space for older administrative materials and closed cases where the court cases are also closed but appeals could still occur.



Treasury "go fast" boats

For the area of parking, government vehicles need to be separate from general public parking and completely secure. Oversized vehicles and special use vehicles require shielding from public view. We have listed opportunities for efficient use of additional resources to provide this and other necessary space to officers on page 20.



Treasury helicopter in action

## Easy to Recommend; Hard Part's Funding

### An Evaluator's Perspective

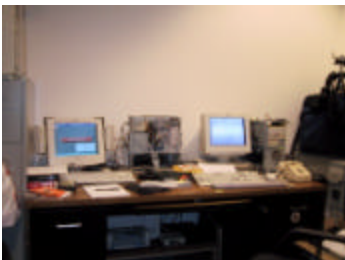
In our opinion, Treasury law enforcement bureaus and offices have outlined thorough standards to satisfy their unique space needs. We believe these standards can be used to effectively justify the resources needed to establish a sound infrastructure.

Generally, Treasury bureaus are trying to implement these standards without adequate financial resources. Many observations led to this conclusion. First of all, each law enforcement bureau has identified in a published document the standards for space in its offices. Second, each bureau told us they spend a significant portion of their budget on fulfilling space needs. And lastly, when implemented, the published standards resulted in a visibly more effective office. When not implemented, the results were chaotic.



Hallway near freight elevator converted into storage room

In general, offices have taken extreme measures to adapt their dated workspace to meet their current needs. One office converted a working freight elevator into a supply storage room because its supply storage room was converted to a case document work area for grand jury evidentiary files. Another converted a secure storage room into a computer forensics office because 13 consecutive cases all involved seized computers containing evidence. We observed, at 12 offices out of 50, stacks of these seized computers lining the hallways from floor to ceiling as they wait their turn in the lab. Some offices have converted their fingerprint and photographic dark rooms into suspect processing areas, while others have turned interview rooms into areas to house photocopiers or conduct meetings. Some offices converted holding rooms into equipment and evidence storage areas.

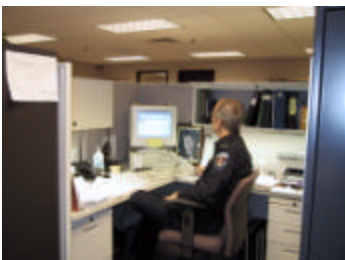


Computer forensics area

During this project, we saw firsthand across the country the benefits of space built to the high standards in place. We were told that if properly funded, and with support from Congress, the four Treasury law enforcement bureaus (ATF, IRS-CI, USCS, USSS), FinCEN, and FLETC could implement established standards nationwide. Solid anecdotal evidence at every location visited leads us to believe great improvement in efficiency and effectiveness would accompany an improved Treasury law enforcement workspace infrastructure.

We realize a modern infrastructure will come at a cost, but believe that in the case of Treasury law enforcement, the investment is warranted. While we could fill many pages with interesting anecdotes of officers' initiative, we believe most officers would prefer to see Treasury's standards implemented. Only with adequate space can officers carry out their missions within the letter of the law and without fear for personal safety.

Without significant investments in Treasury law enforcement space infrastructure, we were told Treasury risks compromising its law enforcement missions, the loss through attrition of its highly trained law enforcement workforce, and possibly tragedy.



60 square foot cubicle



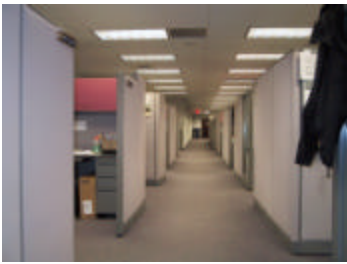
Desk located in open area

If Treasury receives additional resources earmarked for the continued rebuilding of its law enforcement infrastructure, we were told during our review that it would be able to implement existing published standards.

We believe the individual Treasury law enforcement bureaus and offices should continue implementing their published standards following existing plans and based on internal funding assessments.

Treasury-wide, opportunities exist for improving the law enforcement space infrastructure on a macro level should Treasury receive additional resources for this purpose. We have listed six possible priority Treasury law enforcement space initiatives below:

1. Create a central Treasury task force tactical funding reserve managed by the Office of Enforcement to supplement existing and unanticipated task force challenges and increases in size—Possibly allocate resources from this fund directly to the bureaus to cover the unpredictable costs of task force workspace, storage, equipment, and parking
2. Rent joint staging space with adequate parking in all major metropolitan areas for use by Treasury law enforcement bureaus and offices—Manage the space by distributing management oversight equitably to one host bureau at each location
3. Construct shared weapons qualification ranges in every major metropolitan area lacking easy, flexible access to safe range facilities
4. Construct case document work areas for offices that handle paper-intensive grand jury case files—Centrally fund mobile document cages for storing and moving sensitive case files at Treasury law enforcement offices
5. Obtain additional secure and discreet parking for all Treasury government owned vehicles
6. Encourage consistency of size, location, security, and construction of single use space Treasury-wide—Plan for space needs for new employees and evolving law enforcement challenges well beyond next year’s budget and increase the amount of space dedicated for managing case information, storing files, and controlling weapons, ammunition, and evidence



Rows of cubicle workspace



Case document work area

## Future Study

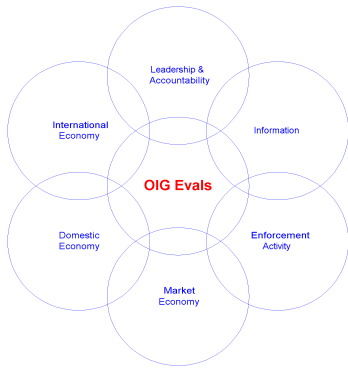
### Other Areas Deserve a Look

When we initiated our portion of the total Treasury infrastructure study, we would have liked to look at some other issues related to space. These include: office furnishings and equipment; utilities requirements and costs; cleaning (custodial) and maintenance requirements and costs; telecommuting policies and approaches; overseas housing, transportation, and security; and office space security.

The relatively short timeframe for the study prevented us from covering these areas. We recommend a review of these issues in the future as they impact Treasury’s workspace infrastructure.



Federal office building facilities



## About the Evaluators

All contributors to this study serve as evaluators with OIG Evals, Office of Inspector General, Department of the Treasury. OIG Evals offers clients hundreds of years combined experience, Ph.D. and Masters level training, administrative and operational systems experience, economic policy expertise, and focused program and policy analysis. We complement our teams with government and private sector experts. We provide unique insight of the inner workings of Treasury across 6 overlapping Zones of Evaluation.

**Vivian Dupuy** recently completed her 32nd year of Federal government service. Since transferring to Treasury in 1986 from the Department of the Navy, Vivian has served as an Audit team member and program evaluator reviewing Treasury programs and policies. She has extensive analytical experience in many different program areas, including firearms management controls, intellectual property rights, Internal Revenue Service tax system modifications, and Office of the Comptroller of the Currency legacy computer system.

**Chris Heppe** has over 20 years experience as a management analyst. As project manager, he has coordinated dozens of projects in his career. His exceptional accomplishments include work in the areas of: Treasury internal security operations and management controls; Congressional reporting on major management challenges facing Treasury; the Government Performance and Results Act; and with Treasury grant and loan programs. Chris is lead evaluator for a new Treasury self-inspection program. This program, which Chris has customized for Treasury's internal culture, takes the "gotcha" out of program evaluation and allows managers to better understand their programs.

**John Lemen** has over 20 years of Federal government service. John started his career in the General Accounting Office where he was exposed to a broad spectrum of government programs. Some of his major accomplishments include immigration law revisions relating to marriage fraud and congressional testimony on the costs of converting federal employees to law enforcement officers.

**Susan Sebert** served more than 8 years at the U.S. Department of Agriculture until recently joining Treasury's OIG Evals staff in January 2001. In her previous position, she served as analyst for a major community development program at the Department of Agriculture. In that role she created a national data tracking system, coordinated multi-agency working group activities and provided assistance to dozens of federal, state, and local government offices and public and private non-profit organizations.

**Adam Silverman** arrived to OIG Evals in 2000. As Director, he has structured OIG Evals as an in-house, up-front management consulting service provider. Prior to this role, Adam served as Executive Officer and in the areas of financial systems development, annual planning and accountability reporting, performance measures, leadership, and training at the U.S. Customs Service. Before Customs, he served on the National Performance Review implementation team, and as a cross-government consultant on payroll and personnel systems and personnel policy. Before returning to government service in 1993, Adam managed an international training program in epidemiology. From 1986 to 1990, he served as a military intelligence officer in the U.S. Army.

### OIG Evals 6 products include:

- "Quick Hit" management feedback
- Policy effectiveness study
- Program efficiency rating
- Best practices research
- Vulnerability risk assessment
- Compliance checklist review



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