

PROTECTING THE NATIONAL WILDLIFE REFUGE SYSTEM

LAW ENFORCEMENT REQUIREMENTS FOR THE 21ST CENTURY



Prepared by

The International Association of Chiefs of Police

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December 2000

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INTRODUCTION

This report presents the findings and recommendations of a five-months IACP study of the Refuge Law Enforcement function of the United States Fish and Wildlife Service. Called for by the Director of the Fish and Wildlife Service and managed by the Office of the Inspector General, Department of the Interior, the study achieves, in some measure, the intent of a recommendation in Fulfilling the Promise, a 1999 issues and challenges document prepared by a cross-section of National Wildlife Refuge System executives and staff members:

Assess the status of public safety and resource protection provided by refuge law enforcement officers, and make recommendations for the future direction of law enforcement in the System.

SCOPE OF WORK

Eleven dimensions of the law enforcement function were selected for study:

- Recruitment – effectiveness of current practices
- Training – effectiveness of formal, on the job, and developmental training
- Retention of law enforcement officers
- Organization to conduct law enforcement operations
- Staffing – effectiveness of utilizing collateral law enforcement officers at a ratio of 9:1; adequacy of law enforcement staffing levels
- Management accountability and the law enforcement program
- Professional development of law enforcement managers
- Policy and written directives – including compliance
- Internal investigations – including the discipline process.
- Equipment – adequacy, uniformity, and availability of law enforcement equipment
- Assaults on Refuge Law Enforcement Officers

The scope of work was distilled from discussions with the Inspector General, serving as the representative of the Director of the Fish and Wildlife Service, the staff of the Inspector General, and executives and managers of the Refuge System.

STUDY APPROACH

Work was conducted in four phases. Phase 1, Project Organization and Design, consisted of project scoping; design of an organizational culture/workforce survey; construction of field interview guidelines; and collection of FWS/Refuge background materials.

Phase 2 centered on Field Work/Site Visits. Twenty-seven (27) refuges were visited. Region, geographical location, size, and special law enforcement requirements were the principal criteria for constructing the site visit/refuge profile. We believe that the refuges visited represent the full diversity of the System. Site visits featured closed, confidential, and separate discussions with refuge managers and refuge officers. Strengths and weaknesses of refuge law enforcement practices and recommendations for improvement framed the dialogue. Several hundred managers and officers shared their judgements, observations and recommendations.

Phase 3, Data Analysis and Report Preparation, entailed processing, formatting, analyzing, and synthesizing all information gathered during earlier phases; supplemental data gathering; and preparation of several drafts of our report. Discussion of our field-generated observations with a NWRS management level work group produced important feedback and insights.

Phase 4, Project Wrap-Up, consisted of presentation of the final draft of the report to an FWS and NWRS executive group; discussion of findings and recommendations with the group; review of the draft by FWS, NWRS, and DOI executives; and final modification to the study report.

STUDY TEAM

The study was conducted by Jerome A. Needle, Director of Programs and Research, IACP; Kim J. Kohlhepp, Manager, Center for Testing Services and Executive Search, IACP; Phillip J. Lynn, Manager, Model Policy Center, IACP; Donald R. Shinnamon, Manager, Community Policing Consortium, IACP; Bruce Richter, Captain, Anchorage, Alaska Police Department; and Lieutenant Andrew Ellis, Prince Georges County, Maryland, Police Department. Palmer J. Wilson, Associate Consultant, served as lead consultant.

DOI AND FWS SUPPORT

The DOI and FWS supplied substantial support to the IACP staff, without which the project would not have proceeded effectively. Singled out for leadership roles and special contributions are:

- Earl Devaney, Inspector General

- ❑ Thomas R. Moyle, Chief, Special Inquiries Unit, Office of the Inspector General
- ❑ Jerry Olmsted, National Refuge Law Enforcement Coordinator, Region 9, USFWS
- ❑ Steven A. Knode, Project Leader, Crescent Lake/North Platte NWR Complex, USFWS
- ❑ Tom Goettel, Regional Refuge Law Enforcement Coordinator, Region 5, USFWS
- ❑ Jerry Kuykendall, National Refuge Law Enforcement Training Coordinator, Region 9, USFWS
- ❑ Bob Bartels, Regional Refuge Law Enforcement Coordinator, Region 3, USFWS.

SPECIAL ACKNOWLEDGEMENT

Close to 550 refuge managers and officers invested considerable time to prepare and submit reasoned and thoughtful responses to workforce surveys. Many FWS members spent considerable 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 study is anchored. We acknowledge and thank each of you.

EXECUTIVE SUMMARY

The law enforcement demands of the NWRS are expanding. Refuge visitation is increasing materially, over two million visitors annually. Growth is spawning increases in serious crime, other offenses, law enforcement activity, traffic incidents, and staff day/resource commitments to law enforcement. Vandalism increases are pronounced. Commitment to proactive prevention and control of resource and ARPA violations seems to be diminishing in priority, eroding, or is being passed on to other law enforcement agencies. Drug abuse, drug cultivation, drug trafficking, drunkenness, weapons violations, illegal alien activity, and liquor law violations are all increasing. A shift toward public use generated law enforcement requirements promises to continue to alter the preservation and protection environments.

To retain the excellent level of safety for System users and to intensify the proactive capacity that is so central to achieving the core mission, NWRS leaders should enhance the quantity and quality of law enforcement. The law enforcement complement of the NWRS is modest, the FTE equivalent of 250 officers for a system composed of 530 refuges, 37 wetland management areas, and 93.5 million acres. Quantity enhancement could come from the current complement of collaterals, by committing a greater degree of their time to law enforcement, or from augmentation – new positions. Augmentation does not seem to be achievable from current staff capacity without sacrifice to other equally crucial NWRS functions. Quality enhancement is more likely to occur through addition of full-time officers, who bring or develop greater law enforcement interest, intensity, and experience, than through addition of collaterals.

The potential of an enhanced law enforcement function cannot be maximized within the present organizational, cultural, and program framework. The framework is too studded with management and operating flaws, in crucial areas such as objectives setting and measurement, program evaluations, information management, and organization, to cite several examples. Expansion should occur within the context of a New Vision of law enforcement. In addition to increasing law enforcement staff capacity, quantitatively and qualitatively, foundations of the New Vision should consist of:

- ❑ A more powerful voice for law enforcement at the national level
- ❑ Increasingly unified practices, achieved through greater clarity of common objectives and more coherent policies and procedures
- ❑ Innovation in refuge law enforcement organization and service delivery
- ❑ Rational, data-driven law enforcement officer allocation and deployment
- ❑ Technology, equipment, and information supplements for field officers
- ❑ A comprehensive central support system for the law enforcement function

- ❑ More professional and effective recruitment and selection
- ❑ Intensified law enforcement training
- ❑ Strengthened research, analysis, and planning support for refuges and field officers
- ❑ A management-tailored data system
- ❑ A predictable and protected funding stream.

The Vision should reinforce the many strengths of the current law enforcement system including decentralization, open and vibrant interpersonal communications, and an impressive congruence of positive attitudes and perspectives among law enforcement managers and officers.

THE LAW ENFORCEMENT ENVIRONMENT

The capacity of the National Wildlife Refuge System to meet its protection obligations is conditioned by a complex mix of factors and trends. Among the most consequential are number, size and dispersion of refuges to be policed; visitation; incidence of crime and disorder; range and volume of non-crime protective services; and law enforcement resources.

- ❑ **The System.** The NWRS consists of 530 refuges and 37 wetland management districts. The System manages over 90 million acres, in every state in the Union and several territories. The breadth and diversity of the System demand local, refuge-based management of and accountability for the law enforcement function. The current Project Leader-based authority and accountability structure is the proper model for the NWRS and should be retained. Strengthened centralized efforts at the national and regional levels are recommended.
- ❑ **Visitation.** Population is a powerful correlate of law enforcement requirements. Population growth, law enforcement workload, and law enforcement resource requirements correlate positively. Visitation is the NWRS equivalent of “population.” It is a primary service base.

Visitation is increasing at an annual average of 6.6%. Between 2.3 and 2.6 million additional visitors will have to be serviced by refuge officers for the next several years. Visitation can be expected to reach 42,000,000 by 2002.
- ❑ **Visitor Safety.** Refuges are very safe places for visitors. Approximately two of every 100,000 visitors are victims of serious crime, and that crime is

far more likely to be a property crime than a violent crime. The comparable victimization rate in the National Park Service, also a very safe venue, is less than one visitor per 100,000. For cities and towns throughout the country the comparable rate in 1999 was 4,619 crimes per 100,000 inhabitants.

- **Serious Crime**. Fewer than 700 serious crimes are reported annually. A majority of refuges do not experience even one violent crime during a year, or do not report any. Serious crime has been trending upward, attributable, fully, to increases in reported arsons. The limited number of serious crimes notwithstanding, the increase is consistent with visitation changes.
- **Less Serious Crime**. Less serious crime is far more prevalent than serious crime, but still marginal in rate of occurrence on many refuges. Successive decreases in 1998 and 1999 are notable. Despite substantial increases in visitation, the incidence of less serious crime in 1999 paralleled that of 1995.

In several offense categories trends appear to exist that law enforcement managers should explore and explain. A precipitous decline in natural resource violations in 1999, 35% lower than 1998, and 47% lower than in 1997, is compelling. A dramatic increase in vandalism, 132% in five years, 27% higher in 1999 than in 1996, the previous peak, clearly requires analysis and immediate response. Increases in weapons and drug abuse violations promote questions. In each case, causation may lie in more aggressive law enforcement work, an expanding problem, or both.

- **Other Offenses**. Reported data reflects increasing incidence of offenses in this class, which would be expected in view of visitation trends. The trend is also characterized by extraordinary annual fluctuation, the magnitude of which calls the reliability of data into question. The data are, simply, too erratic to be believable.
- **Refuge Law Enforcement Activity**. Total activity increased substantially between 1997 and 1999, 36%. The pattern of refuge activity demonstrates ever so clearly that the System is composed of refuges where law enforcement events are highly episodic. Almost 400 refuges record a law enforcement event 100 or fewer times each year, one every three-to-four days. About 10% experience 100-500 per year, about one a day. Only 14 refuges (3%) report 500 or more law enforcement events annually. Based on reported activity alone, most refuges cannot cost-justify full-time law enforcement officers. Collateral duty must remain a prominent practice.

The activity pattern also calls out for alternative forms of law enforcement organization. Law enforcement officers, full-time and collateral, are now assigned/restricted to one refuge. Ingrained refuge-by-refuge and full-time or collateral staffing practices inhibit innovation. New refuge staffing models should be designed. To create more useful designs, a rational, data-driven refuge law enforcement officer allocation and deployment scheme is needed, a crucial management tool which does not exist at this time.

- **Clearances**. Nationally, about one in five serious crimes is cleared. The refuge system law enforcement program does less well, clearing 14%. This is attributable in large measure to the transience of the refuge population and the limited corps, geographical dispersion, and priorities of investigative specialists – the staff of the Division of Law Enforcement. Still, a detailed review of investigative practices is warranted, with a focus toward improvement. Like residents of communities across the country, visitors expect refuge law enforcement to close cases, bring offenders to justice and return property.
- **Service Activities**. NWRS law enforcement is not servicing clientele to the degree it has in the very recent past. For the three-year period 1997 to 1999 service activities declined 43%. This phenomenon deserves analysis and response. An examination of reporting practices is in order.
- **Traffic**. Traffic incidents have increased almost 200% since 1995 and by more than half since 1997. Off-road violations have exploded in number. The magnitude of the increase, most of it in 1999, signals deliberate law enforcement intervention and proactivity. Further detail on traffic activity particularly number of crashes, substance abuse causation, and violator profiles, would assist understanding and planning of further prevention and control initiatives.
- **Law Enforcement Staffing**. The NWRS and FWS tend to frame staffing considerations on a base of 602, a number which misrepresents reality. Staffing days data suggest that an FTE total of 244 is more accurate. Framing considerations on a base of 244 illuminates and alters the focus. An FTE law enforcement complement of 244 officers, 90% of whom spend two-thirds of their time on other duties, seems quite modest. The staff days calculation, a flat staffing trend, and visitation growth establish a persuasive case for staffing supplements.
- **Expenditures**. Absence of detail on expenditures precludes analysis of and judgements about current funding levels and the significance of the 44% increase in expenditures between 1997 and 1999.

- **Line-of-Duty Deaths and Assaults.** Line of duty deaths and assaults are minimal. Fourteen (14) refuge officers have been assaulted in 1996. NWRS data show no line-of-duty killings. This positive statistic notwithstanding, refuge officers are continually exposed to danger. Many refuge users are armed, hunters in particular. Substance use and abuse is part of the American culture. Back-up is a priority concern throughout the System, properly so. Priority status must always be accorded to officer safety.

- **Staff Profile.** Overall, the staff profile bodes well for 21st Century organizational transformation. Change occurs more effectively in mature organizations with well educated and well experienced staff. Law enforcement staff is highly educated. Managers have even higher levels of education.

The spread of experience of law enforcement officers with the FWS is normal. The same pattern does not prevail with regard to experience in law enforcement positions. Almost 20% of law enforcement officers have two years experience or less in their current positions. Another 22% have four years of experience or less in current positions. The brevity of these tenures becomes more problematic when the infrequency of law enforcement events in most refuges is considered. Far too many law enforcement officers simply do not accumulate “event experience” to the degree required for confidence and safety. This situation calls for urgent attention. Innovations in training and assignment practices are called for.

THE NWRS LAW ENFORCEMENT CULTURE

A series of attributes dominate the NWRS law enforcement culture. They go far to explain current infrastructure conditions and practices and will heavily influence the change environment. Some attributes bode well for successful organizational and cultural transformation. Most do not.

- **Secondary Status.** The FWS employs many means to protect wildlife and natural resources. Law enforcement appears to be regarded as necessary but less vital than a number of other functions. Although the first wildlife officer had law enforcement powers, a reading of the organization’s history suggests that law enforcement authority was granted as an add-on, to be used only when needed. Current documents reflect a continuing ambiguity. Secondary status is reinforced by a “tolerance” for public use focus and activity.

- **An Unfinished System.** The law enforcement function has evolved somewhat by design, somewhat reactively, and very incrementally. It is not the product of a comprehensive law enforcement design. This

explains the “functional holes” in the organization and absence of compliance with best policies and practices in several areas. This attribute, and the preceding, account for many negative conditions that exist.

- ❑ **Law Enforcement Balkanization.** The law enforcement function is locally administered and controlled with too little guidance from the national level and varying levels of guidance from the regions. This produces inconsistent approaches to law enforcement service delivery and insufficient monitoring and accountability.
- ❑ **Dominance of Collateral Duty.** The System relies primarily on collateral duty officers who concentrate on non-law enforcement preservation tasks and conduct law enforcement functions when demand occurs. This model exhibits distinct flaws:
 - The law enforcement competencies of collateral duty officers degrade directly with lack of utilization of law enforcement skills
 - Officers who do not employ law enforcement skills with requisite frequency are at greater risk for failure and possible injury when attempting to employ the skills
 - Focus on law enforcement is diluted, reducing linkage to the core mission.

At the same time, the collateral system is the only cost-justifiable approach to law enforcement in the majority of refuges, as the NWRS is presently organized for law enforcement.

- ❑ **Underserved Refuges.** In refuges with the collateral duty officers only, the majority, the law enforcement commitment is quite limited. At some sites, law enforcement operations are not visible at all, due to the demands of primary duty assignments. We have been made aware of refuges that have no weekend law enforcement coverage.
- ❑ **Refuge-Bound Allocation and Deployment.** The foregoing condition is explained by absence of a governing, professionally rationalized staffing allocation and deployment plan and further aggravated by the “refuge-bound” nature of resource acquisition practices. The Service does not tend to think beyond the zones of individual refuges. This is not inconsistent with practices in any organization in which competition for finite resources is prevalent.
- ❑ **Primitive MIS Capacity.** Law enforcement management suffers from failure to develop a comprehensive and credible database and a data

capture capability that is accessible at the refuge, regional, and national level for crime and service analysis, resource allocation, and goals and objectives measurement. This problem flourishes, in part, because of minimal demands for data-justified evaluation of law enforcement success or failure.

- **A Changing Refuge Environment.** Only in recent years has an organized public use and visitation marketing effort been undertaken. The number of visitors is increasing measurably, bringing many problems typically confronted by state and local law enforcement agencies, such as drug use, alcohol-related incidents, including DUI, person-to-person crime, homeless-related activity, and gang and sexually-deviant incidents. The visitation trend should continue, further changing the refuge law enforcement dynamic.
- **The Prime Asset.** The law enforcement workforce – full-time and collateral duty officers, refuge managers, and regional executives, is genuinely dedicated to the FWS mission and regard the Service as their career. As already noted, law enforcement managers and officers are highly educated.
- **Readiness for Change.** Field interviews with managers and officers demonstrate institutional readiness to restructure law enforcement conditions, including greater emphasis on employing full-time officers and elevating the law enforcement function to equal status with other NWRS service functions. Both classes express frustration with the secondary status accorded to law enforcement.

THE LAW ENFORCEMENT INFRASTRUCTURE

Current organization, staffing, policies and practices vary in relation to current NWRS needs, level of compliance with contemporary views of best policy and practice, and professional law enforcement standards.

- **Organization.** The organization of the NWRS law enforcement function features significant assets. Employment of a decentralized model that accords substantial empowerment, authority and responsibility to Refuge Project Leaders is the supreme asset. The regional structure, which apports over 500 properties and hundreds of employees among seven manageable clusters makes great sense. Placing law enforcement specialists at regional level for coordination and problem-solving is a third positive of the organization scheme.

Despite these positives, law enforcement is not flourishing in the NWRS. This condition is traceable to many causes, a number of them organizational. Of greatest consequence are:

- An insufficiently competitive organizational position in the national structure
 - Passive central direction and control of the law enforcement function
 - Organizational absence or impotence of crucial law enforcement support functions throughout the System
 - Over-reliance on a refuge-by-refuge organizing and staffing model.
- **Staffing.** The NWRS is functioning with 602 law enforcement officers, 62 full-time and 540 collaterals, a ratio of 1 to 9. The law enforcement commitment from this complement approximates that which would be received from 244 full-time officers. Field interviews, field observations, document research, and study-specific data collections reveal a series of instructive staffing-relevant considerations:
- **Current Complement.** The 62 full-time LEOs are the law enforcement staffing baseline. They engage exclusively in law enforcement activity. Collaterals distribute their time among a range of competing and equally important activities.
 - **Staffing Policies.** Law enforcement staffing policies and criteria do not exist. Unlike most police agencies, the System has not set minimum staffing standards, even ones as basic as 24-hour, seven days per week coverage.
 - **Officer Safety Standards.** The FWS/NWRS has not set law enforcement safety standards, most notably back-up and multiple officer response requirements.
 - **Coverage Gaps.** Many refuges are uncovered by full-time or collateral law enforcement officers during evening hours, on weekends and on some holidays, due to scheduled days off, sick leave, and out-of-refuge professional activities.
 - **Collaterals.** An unquantifiable number of collateral duty officers do not regard law enforcement as a primary duty, are not as motivated about this aspect of activity as some

others, and may not exhibit the performance quality of full-time officers. Overall, collaterals are not the base upon which to build the law enforcement future. Nor are career seasonals, another option.

- **Leveraging Capacity.** The combination of refuge dispersion and small staff complements at many refuges inhibits leveraging capacity and flexibility. Refuges have very limited ability to multiply staff for special events or to confront special problems without sacrificing essential refuge work of other kinds.
- **Staffing Trends.** The NWRS has not been able to supply reliable staffing trends data. One document in our collection places 1993 staffing at 625 collateral duty officers, 40 full-time officers and 30 seasonals, a total of 665 excluding the seasonals. It seems reasonable to conclude that law enforcement staff has not increased in recent years.
- **Service Population.** In contrast to stable or declining staff, visitation is increasing and is projected to continue to grow.
- **Refuge Profile.** Also in contrast to stable or declining staffing, the number of refuges has increased marginally, 13 since 1995, as has the number of acres to be protected, almost one million since 1995.

The configuration of staffing-relevant attributes justifies an increase in law enforcement staff. Augmentation should concentrate on addition of full-time law enforcement officers. Augmentation should be paralleled by a concerted effort to establish a defensible law enforcement staff allocation and deployment methodology, a comprehensive resource leveraging program, search for innovations in organization, and a focus on intensified supervision, mentoring, and guidance.

- **Mission, Goals and Objectives.** Every full-time or collateral law enforcement officer should function with the guidance, direction, and benefits of a carefully articulated and measurable set of law enforcement outcomes that he or she is accountable for achieving. These should “tier down” from refuge objectives which in turn should tier from regional, System, and Service objectives. The FWS, NWRS, individual refuges, and law enforcement officers are not even remotely positioned to satisfy this standard. From top to bottom, from the Service level to the refuge officer, measurable objectives are absent. Lacking these, the management function is impaired in a variety of ways, direction and guidance, planning and evaluation being most crucial.

- **Policies and Procedures.** The NWRS is aware that substantial work is required to codify, streamline, and render more user-friendly, the overpowering volume of directives. Recognizing the problem does not justify, however, allowing the revision process to languish, as is the case; to accord low priority to the effort, as seems to be the case; or to commit only marginal resources to the task, as is the case. We find a series of inadequacies ranging from policy gaps to redundancies and from construction to language shortfalls. On the positive side, a satisfactory and workable organizing structure and policy format has been developed.
- **Recruitment, Selection, and Promotion.** The law enforcement officer hiring process is characterized by a decentralized system and absence of a coordinating mechanism to ensure that effective recruitment takes place and that proper steps in selection are followed. Recent efforts to improve the system are constructive. They also substantiate that the process requires reconstruction to comply with professional standards. The process should be revised and placed in the hands of a single entity, responsible and accountable for its success.

Evaluation of candidates should be greatly intensified prior to selection of finalists and conditional offers of employment. A broader base of information will enhance the quality of the selection practices. In addition to the Crediting Plan, a well-designed approach to structured evaluation of job relevant KSAs, a valid written examination should be used to test candidates. A carefully developed and standardized structured interview should complement information obtained from the Crediting Plan and the written examination. The medical, psychological, background, and PEB, combined for pass/fail administration, should remain at the post-conditional offer of employment stage.

- **Training.** Primary measures of effectiveness of the training function include: how well training initially prepares officers to perform duties; how well officer skills are maintained; and how well officers are prepared to assume greater responsibility in the future. The poor condition of NWRS training records precludes application of primary measures and inhibits definitive judgement of training. We are able to conclude that numerous program and administrative deficiencies exist that should be addressed. When corrected, the program will be strengthened considerably. Improvements are available in organization; accountability; record-keeping; curricula; training sequence; training scope; and leadership development.
- **Professional Standards.** Primary measures of appropriate officer behavior and agency ethical standards are:

- Number of and trends in citizen and supervisor-initiated complaints
- Number of and trends in sustained citizen and supervisor-initiated complaints
- Number of and trends in the most serious types of complaints
- Citizen and supervisor satisfaction with agency response to complaints and final outcomes.

Total absence of a professional standards statistical base prohibits application of the primary measures. This management information gap has to be closed. In addition to a professional standards database, substantial work is required to give form to professional standards practices. The most significant step is to fix authority for professional standards. Disparately located policies and procedures must be consolidated and issued in non-conflicting and user-friendly form.

THE STATE OF REFUGE LAW ENFORCEMENT – WORKFORCE PERSPECTIVES

To give every Refuge law enforcement manager and officer a voice in the study, workforce surveys were conducted. The workforce has not delivered a vote of confidence for the capacity of the NWRS to ensure safety of wildlife and visitors. In the view of the workforce, perceived shortfalls and unmet needs surpass perceived assets. In the job preparation and direction area, training is considered to be strong. Policies and procedures and supervision fall short. Career conditions are poorly regarded, from recruitment through performance evaluation. Management obligations are not being met well is the collective view of officers.

Both officers and managers regard the following conditions and practices to be unsatisfactory:

- Capacity to safeguard natural resources
- Capacity to safeguard visitors
- Program evaluation
- Accountability of directors and managers
- Back-up availability
- Communications systems and technology.

Officers regard the following conditions and practices to be unsatisfactory:

- ❑ Collateral duty
- ❑ Direction and guidance from regional managers
- ❑ Promotion practices
- ❑ Performance evaluation
- ❑ Recruitment and selection.

Officers regard the following practices as marginally satisfactory:

- ❑ Direction and guidance from refuge managers
- ❑ Policies and procedures
- ❑ Direction and guidance from regional law enforcement coordinators
- ❑ Equipment, technology, and information.

Managers regard the refuge enforcement objectives situation quite negatively.

Both officers and managers are positive about two conditions: understanding of NWRS enforcement objectives; law enforcement officer personal protection capacity. Officers are highly positive about basic and in-service training and refuge law enforcement objectives. Managers are positive about the level and quality of equipment, technology and information accorded to the law enforcement function.

As the law enforcement function of the NWRS evolves or is re-engineered, workforce perspectives deserve important consideration. The unanimity that exists among officers and managers in six important areas of need can serve as a framework for cooperative change.

PRIORITY RECOMMENDATIONS

This report offers 50 recommendations. While all are important, they vary with regard to potential impact on law enforcement effectiveness, cost, and complexity of implementation. Further, organizations have differing capacities to absorb change without encountering dysfunction. With consideration of these factors, we single out 10 actions as paramount for successfully forging a New Vision for NWRS law enforcement.

- 1. Create a tiered structure of law enforcement goals and objectives, consisting of measurable outcomes for the:**
 - a. NWRS**
 - b. Regions**
 - c. Refuges**
 - d. RLEOs.**

- 2. Restructure NWRS law enforcement by:**

- a. **Creating a Law Enforcement Branch, headed by a Branch Chief.**
 - b. **Establishing three offices within the Branch: Operations; Administration and Support; Professional Responsibility.**
 - c. **Creating new or enhancing current central support services: Personnel and Training; Technology and Equipment; Planning and Budgeting; Information Management; Inspectional Services; Internal Affairs.**
 - d. **Strengthening law enforcement supervision and support services in the regions.**
3. **Increase the current complement of 602 refuge law enforcement officers:**
 - a. **Prioritize addition of full-time law enforcement officers.**
 - b. **Depart from exclusive reliance on traditional refuge-by-refuge staffing schemes in favor of innovative staffing schemes.**
4. **Develop a defensible law enforcement staffing allocation and deployment model.**
5. **Accompany staff augmentation with new or intensified productivity and resource leveraging strategies.**
6. **Accord sufficient priority and resources to re-energize and complete the policy and procedures consolidation and renewal process.**
7. **Restructure the human resources acquisition program:**
 - a. **Establish a central authority to manage the human resources function.**
 - b. **Design and implement an aggressive nationwide recruitment process**
 - c. **Introduce additional diagnostic and selection steps including a validated written law enforcement entrance examination and an oral interview.**
8. **Appoint a central Manager of Law Enforcement Training. Priorities should include:**

- a. **Revising of the LMTP and ROBS curricula**
 - b. **Designing a Field Training Program**
 - c. **Developing a comprehensive law enforcement records system.**
- 9. Establish a central Office of Professional Responsibility. Priorities should include:**
- a. **Restoring policy and program compliance audits of regions and refuges.**
 - b. **Developing early warning systems to identify officers at-risk for dysfunctional behavior.**
- 10. Establish a central Office of Information Systems. Priorities should include:**
- a. **Developing an information base for System management.**
 - b. **Developing an information base for refuge law enforcement operations.**

INDEPENDENT VOICES

Five earlier audits and studies of the NWRS law enforcement function have been examined. Vary in purpose, scope, and methodology, these studies offer findings and recommendations for improving 25 aspects of NWRS law enforcement. Review indicates that a range of NWRS law enforcement conditions singled out for attention in this report have existed for many years and have been singled out for attention by earlier analysts and auditors. Most consequential for law enforcement effectiveness are:

- An under-developed central direction and accountability structure
- Policy and procedure inadequacies
- Recruitment and selection issues
- Cooperative agreement and MOU initiatives
- Communications equipment shortfalls
- The professional standards – inspections gap

- Training gaps – FTO and leadership.

The reinforcing nature of successive audits accords credibility to observations and recommendations set forth in this report. The import of the comparative analysis for change expectations is of great significance also. Champions of change will have to emerge to employ the recommendations of this audit more constructively than has been the case with previous audits.

CHAPTER I: THE POLICING ENVIRONMENT

The capacity of the National Wildlife Refuge System (NWRS) to meet its protection obligations is conditioned by a complex mix of factors and trends. Among the most consequential are number, size and dispersion of refuges to be policed; visitation; incidence of crime and disorder; range and volume of non-crime protective services; and law enforcement resources.

SECTION 1: NWRS MISSION

The National Wildlife Refuge System Improvement Act of 1997 sets forth the mission:

The mission of the System is to administer a national network of lands and waters for the conservation, management, and where appropriate, restoration of the fish, wildlife and plant resources and their habitats within the United States for the benefit of present and future generations of Americans.

SECTION 2: LAW ENFORCEMENT POWERS

Police authority is conveyed in the Fish and Wildlife Service Manual, which has regulatory force and effect within the Service. Service Directive 036 FW1, Law Enforcement Authority (March 4, 1993), specifies 14 federal fish and wildlife laws that special agents and refuge law enforcement personnel are authorized to enforce. Among these is the National Wildlife Refuge System Administration Act (16 USC 668dd), considered the fundamental act for the System.

With regard to law enforcement, 50 CFR, Chapter 1, Section 28.21 states that refuge managers and others are authorized to “. . . protect fish and wildlife and their habitat and prevent their disturbance, to protect Service lands, property, facilities, or interests therein and to ensure the safety of the using public to the fullest degree possible.”

SECTION 3: THE SYSTEM

The first refuge, designated by President Theodore Roosevelt in 1903, consisted of three acres. The System has experienced dramatic and continued growth since its modest beginning. The Report of Lands Under Control of the U.S. Fish and Wildlife Service lists 521 refuges (September 30, 1999.) The System manages over 90 million acres, in every state in the union and in the Pacific Outlying Area, Puerto Rico and the Virgin Islands. During Fiscal Year 1999 the System grew by 230,000 acres to a total of 90,644,775. Of 60 states/territories/possessions, 38 (63%) increased the number of acres under System control. Only four (7%) lost acreage. (Table 1.) Every one of the NWRS regions increased acreage in 1999, most quite marginally. (Table 2.)

Table 1
LANDS UNDER CONTROL OF THE NWRS 1998 – 1999⁽¹⁾

State	Number of Refuges			Acreage		
	FY98	FY99	Change	FY98	FY99	Change
Alabama	9	9	--	57,806.35	57,866.47	+60.12
Alaska	16	16	--	76,955,623.11	76,981,281.12	+25.658
Arizona	9	9	--	1,711,366.29	1,711,366.29	--
Arkansas	10	10	--	344,530.03	345,322.03	+802
California	37	37	--	432,171.78	444,623.72	+12,451.94
Colorado	6	6	--	79,482.95	79,424.95	-58
Connecticut	1	1	--	774.73	774.73	--
Delaware	2	2	--	26,720.51	26,720.51	--
Florida	29	29	--	973,675.26	975,695.05	+2,019.79
Georgia	8	8	--	479,013.30	479,013.30	--
Hawaii	9	9	--	294,767.91	294,767.91	--
Idaho	6	6	--	81,292.33	81,292.33	--
Illinois	7	7	--	111,531.80	111,725.44	+193.64
Indiana	2	2	--	10,957.59	12,035.10	+1,077.51
Iowa	4	4	--	85,530.98	86,088.76	+557.78
Kansas	4	4	--	58,523.50	58,523.50	--
Kentucky	2	2	--	3,870.64	7,466.95	+3,596.31
Louisiana	20	20	--	508,711.52	510,517.77	+1,806.25
Maine	8	9	+1	53,198.85	53,542.38	+343.53
Maryland	6	6	--	43,045.39	44,070.30	+1,024.91
Massachusetts	10	10	--	12,757.39	13,753.39	+996.00
Michigan	7	7	--	115,119.23	115,328.12	+208.89
Minnesota	10	10	--	206,116.93	207,410.81	+1,293.88
Mississippi	10	10	--	220,954.91	223,499.58	+2,544.67
Missouri	7	7	--	56,648.92	56,346.52	-302.40
Montana	21	22	+1	1,134,851.00	1,144,298.20	+9,447.20
Nebraska	5	5	--	151,462.65	150,258.47	-1,204.18
Nevada	9	9	--	2,318,982.40	2,320,592.57	+1,610.10
New Hampshire	4	4	--	5,863.70	5,863.70	--
New Jersey	5	5	--	66,506.11	68,717.22	+2,211.11
New Mexico	7	7	--	384,223.86	384,232.61	+8.75
New York	9	10	+1	27,680.26	28,401.83	+721.57
North Carolina	11	11	--	419,674.47	420,594.13	+919.66
North Dakota	64	63	-1	296,614.70	296,506.45	-108.25
Ohio	3	3	--	8,323.18	8,353.18	_30
Oklahoma	9	9	--	164,008.84	164,022.84	+14
Oregon	20	20	--	587,373.66	589,412.04	+2,038.38
Pennsylvania	3	3	--	9,829.29	9,829.29	--
Rhode Island	5	5	--	1,707.41	1,707.41	--
South Carolina	7	7	--	154,373.66	160,228.59	+5,259.37
South Dakota	7	7	--	48,508.90	48,508.90	--
Tennessee	6	6	--	114,129.03	114,446.73	+317.70
Texas	18	18	--	465,202.01	496,447.64	+31,245.63
Utah	3	4	+1	104,056.70	104,457.70	+401
Vermont	1	1	--	6,499.48	32,764.29	+26,264.81
Virginia	12	12	--	126,561.74	128,645.19	+2,083.45
Washington	20	20	--	178,272.37	179,273.11	+1,000.74

⁽¹⁾ Wetland Management Districts are not included in this table.

Table 1 (cont'd)						
LANDS UNDER CONTROL OF THE NWRS 1998 – 1999 ⁽¹⁾						
State	Number of Refuges			Acreage		
	FY98	FY99	Change	FY98	FY99	Change
West Virginia	1	1	--	3,851.03	5,070.35	+1,219.32
Wisconsin	6	7	+1	162,792.65	162,815.90	+23.25
Wyoming	7	7	--	80,918.57	80,921.14	+2.57
American Samoa	1	1	--	39,066.00	39,066.00	--
Baker Island	1	1	--	31,736.89	31,736.89	--
Guam	1	1	--	23,228.10	23,228.10	--
Johnson Atoll	1	1	--	100.00	100.00	--
Midway Island	1	1	--	298,362.30	298,362.30	--
Puerto Rico	4	4	--	3,556.64	4,826.64	+1,270.00
Virgin Island	3	3	--	385.65	548.92	+163.27
Howland Island	1	1	--	32,550.25	32,550.25	--
Jarvis Island	1	1	--	37,519.17	37,519.17	--
Navassa Island	0	1	+1	0	92,000.00	+92,000.00
TOTALS	516	521	5	90,413,560.43	90,644,774.78	231,214.27 (.3%)

Table 2	
REGIONAL INCREASES 1999	
Region 1:	Total increase 109,101.16 (3% of 3,768,049.20) (WA, OR, ID, CA, NV, HI, Pacific Outlying Area)
Region 2:	Total increase 31,268.38 (1.2% of 2,724,800.00) (AZ, NM, TX, OK)
Region 3:	Total increase 3,082.55 (.4% of 757,021.28) (OH, IN, IL, MO, MI, MN, WI, IA)
Region 4:	Total increase 18,759.14 (.6% of 3,282,709.90) (LA, FL, GA, SC, NC, KY, TN, AL, MS, AK, PR, VI)
Region 5:	Total increase 34,864.70 (9% of 384,995.89) (VT, VA, WV, MD, DE, NJ, PA, NY, MA, RI, NH, ME, CT)
Region 6:	Total increase 8,480.00 (.4% of 1,954,418.80) (MT, ND, SD, CO, WY, UT, NE, KS)
Region 7:	Total increase 25,658.00 (.03% of 76,955.623.11)

The System continues to grow since September 30, 1999. At the end of 2000 Fiscal Year there were 530 National Wildlife Reserves and acreage totaled 93.5 million.

SECTION 4: VISITORS

Almost 35 million persons visited national wildlife refuges during Fiscal Year 1999. This represented increases of:

- 1.5 million (5%) over Fiscal Year 1998
- 7.3 million (26%) over Fiscal Year 1995.

The average annual increase from FY95 to FY99 is 1.8 million visitors, 6.6%. The System has grown continuously. Regional growth has fluctuated. One region (2) grew at a rate that exceeds the system average. Two regions (3 & 4) grew at rates that approximate the system average. Three regions (5, 6 & 7) experienced growth at a lower rate than the System average and one (Region 1), experienced a decline. Region 4 is the only one that experienced an increase in visitation in each of the past three years.

Table 3							
REFUGE VISITATION 1995-1999							
	FY 1995	FY 1996	FY 1997	FY 1998	FY 1999	Change – Number¹	Change – Percent¹
Region 1	n/a	3,694,733	3,811,390	3,776,968	3,500,114	-194,619	-5%
Region 2	n/a	3,273,451	3,602,716	3,238,928	4,482,098	+1,208,647	+37%
Region 3	n/a	5,955,087	6,494,423	7,521,480	7,462,734	+1,507,647	+25%
Region 4	n/a	8,557,737	9,078,936	9,716,547	10,509,082	+1,951,345	+23%
Region 5	n/a	4,632,408	5,165,017	5,561,846	5,238,331	+606,923	+13%
Region 6	n/a	2,420,987	2,184,586	2,501,644	2,690,113	+269,126	+11%
Region 7	<u>n/a</u>	<u>934,679</u>	<u>1,022,712</u>	<u>990,474</u>	<u>971,597</u>	<u>+36,918</u>	<u>+4%</u>
Total	27,580,176	29,468,082	31,359,780	33,352,887	34,854,069	7,273,893	+26%
Change - Number	n/a	1,887,906	1,891,698	1,993,107	1,501,182		
Change – Percent		+7%	+6%	+6%	+5%		

¹ Changes in Regional totals are for the years 1996-1999. Changes in System totals are for 1995-1999.

SECTION 5: SERIOUS CRIME

The Uniform Crime Reporting program (UCR) classifies crimes as Part I and Part II. Part I crimes are divided into violent crimes against persons and property crimes. Violent crimes include murder, rape, robbery and aggravated assault. Property crimes include burglary, theft, motor vehicle theft and arson.

Table 4 profiles serious crime in the System for the five-year period 1995-1999. The number reported ranged from a low of 526 in 1995 to a high of 655 in 1999, an increase of 25%. Violent crime declined by one incident. Property crime increased 130 incidents (26%).

The rate of serious crime in 1999 was 1.88 per 100,000 visitors, .07 per 100,000 visitors for violent crime and 1.8 for property crime. Approximately two visitors per 100,000 experienced serious criminal victimization in 1999.

Table 4							
SERIOUS CRIME 1995-1999							
Offense	1995	1996	1997	1998	1999	Change - Number	Change - Percent
Homicide/Mans.	7	7	9	10	7	0	--
Rape/Atts.	0	3	1	1	2	--	--
Robbery	5	2	1	1	0	--	--
Aggravate Assault	14	11	8	27	16	+2	+14%
Violent Crime	26	23	19	39	25	-1	-4%
Burglary/Atts.	240	202	271	177	97	-143	
Theft	118	349	187	217	197	+79	+67%
Motor Vehicle Theft	31	38	60	55	61	+30	+97%
Arson	111	24	101	100	275	+164	+148%
Property Crime	500	613	619	549	630	+130	+26%
Total Serious Crime	526	636	638	588	655	+129	+25%
Change – Number	--	+111	+2	-50	+67	--	--
Change - Percent	--	+21%	+0.01%	-7%	+11.4%	--	--

Serious crime trends on refuges and nationwide are compared in Table 5. Total serious crime declined nationally in each of the past two years, 12% in total. On refuges it declined in 1998 and increased in 1999, a net increase for the past two-year period, 4%. Nationally, violent crime declined each of the past two years. On refuges it increased in

1998 and declined in 1999. Nationally, serious property crime declined each of the past two years. On refuges it declined in 1998 and increased in 1999.

Table 5				
TRENDS 1998/1997 AND 1998/1999				
(PERCENT CHANGE)				
Offense	Refuges		Nation	
	1997/1998	1998/1999	1997/1998	1998/1999
Murder	+11	-30	-7	-8
Rape	--	+100	-3	-7
Robbery	--	-100	-10	-8
Aggravated Assault	+238	-41	-5	-7
Violent Crime	+105	-41	-5	-7
Burglary	-35	-45	-5	-11
Theft	-16	-9	-5	-6
Motor Vehicle Theft	-8	+11	-8	-8
Arson	-1	+175	-7	-5
Property Crime	-11	+15	-5	-7
TOTAL SERIOUS CRIME	-7	+11	-5	-7

SECTION 6: LESS SERIOUS CRIME

From a victim's standpoint, every crime is serious. For UCR reporting purposes crimes not classified as Part I, serious, are classified as Part II. These include: simple assault; forgery and counterfeiting; fraud and embezzlement; stolen property offenses; vandalism; weapons violations; drunkenness; disorderly conduct; suspicious persons; curfews and juvenile runaways; and hate and bias crimes. In addition to the conventional range of Part II crimes, refuges capture data on natural resource violations, archaeological violations and endangered species violations. Part II crimes recorded by the refuge system are displayed in Table 6.

Less serious crime increased 16% for the five-year period, 1995-1996. The number of reported crimes ranged from 14,467 in 1995 to 21,532 in 1997. After peaking in 1997, less serious crime decreased in both 1998 and 1999:

	<u>Year</u>	<u>Change</u>
□	1997	4,559 (+27%)
□	1998	-3,966 (-18%)
□	1999	-777 (-4%).

Offense	1995	1996	1997	1998	1999	Change Number	Change Percent
Assault	7	26	17	24	17	+10	+142%
Forgery/Counterfeit	--	0	0	5	1	--	--
Fraud/Embezzlement	5	10	1	1	4	-1	-20%
Stolen Property	23	42	58	38	87	+64	+278%
Vandalism	2,268	4,128	4,072	3,793	5,257	+2,989	+132%
Weapons	517	549	421	643	827	+310	+60%
Prostitution/Vice	0	4	2	4	4	--	--
Sex Offense	10	8	65	133	63	+53	+530%
Drug Abuse	289	469	516	624	530	+241	+83%
Gambling	--	3	2	4	5	--	--
DWI	69	106	136	90	110	+41	+59%
Liquor Laws	--	235	375	161	798	--	--
Drunkenness	101	404	95	251	133	+32	+32%
Disorderly Conduct	96	146	163	151	172	+76	+79%
ARPA Violation	--	2	111	57	53	--	--
Nat. Res. Violation ¹	11,078	10,747	13,898	11,243	7,255	-3823	-35%
Suspicious Person	--	38	240	115	448	--	--
Curfew/Runaways	--	46	863	117	181	--	--
Hate/Bias	4	10	6	6	29	+25	+625
Endangered Species	--	--	173	61	204	--	--
Illegal Aliens	--	--	318	45	611	--	--
TOTAL	14,467	16,973	21,532	17,566	16,789	+2,322	+16%

¹ Includes: coal, oil, gas mineral; hazmat; timber theft; wild horse and burro; wildland arson; occupancy trespass; trespass; hunting and fishing violations.

Natural resource violations are most prevalent, followed by vandalism. These two categories account for 85% of less serious crime.

	<u>Resource and Vandalism Total</u>	<u>Percent of Total</u>
1995	13,346	93%
1996	14,875	88%
1997	17,970	84%
1998	15,036	86%
1999	12,512	75%

SECTION 7: OTHER OFFENSES

Other offenses consist of violations not classified and counted as Part I or Part II. These include: abandoning/dumping property; camping/fee offenses; permitted/authorized uses; fish, wildlife, plants and closure offenses. Table 7 displays other offenses for the four-year period 1996-1999. Number of other offenses ranges from a low of 4,728 in 1996 to a high of 12,811 in 1999. The profile exhibits extreme fluctuation from year to year.

Year	Number of Offenses	Change: Number	Change: Percent
1996	4,728	--	--
1997	10,132	5,404	114%
1998	4,875	-5,257	- 52%
1999	12,811	7,936	132%

SECTION 8: LAW ENFORCEMENT WORKLOAD

The primary measures of law enforcement field workload are calls-for-service and self-initiated activity. The NWRS has not created a comprehensive and reliable workload data capture system. Important workload components are captured, however, by the Refuge Management Information System. RMIS activity categories are:

- ❑ **Incidents Documented.** Number of incidents formally documented in refuge files, excluding cases resulting in NOVs.
- ❑ **NOVs and State Citations.** Number of notices of violations and state citations issued by refuge officers.
- ❑ **Case Assists.** Number of cases processed by FWS special agents, state wildlife officers, and other law enforcement officers, where citations issued were based solely or largely on the investigation by a refuge officer.

(Definitions from the RMIS Accomplishment Report.) RMIS data also supply a portrait of dispersion of activity throughout the System.

Total activity for 446 refuges for the three-year period 1997 to 1999, and annual changes, are:

<u>Year</u>	<u>Total</u>	<u>Change- Number</u>	<u>Change - Percent</u>
<input type="checkbox"/> 1997	24,472	--	--
<input type="checkbox"/> 1998	28,778	4,306	17.6%
<input type="checkbox"/> 1999	33,175	4,397	15.3%

For the three-year period, refuge law enforcement activity increased by 8,703 events, 36%. Refuge specific statistics can be found in Appendix 1.

Four refuges, one percent of the total for which data are available, reported 27% of activity in 1999. Nine others reported an additional 18%. The 13 refuges named below, 3% of the 446 reporting entities, account for half (45%) of the law enforcement activity.

<u>Refuge</u>	<u>Law Enforcement Activity -- 1999</u>
<input type="checkbox"/> Parker River	3,365
<input type="checkbox"/> Wichita Mountains	2,029
<input type="checkbox"/> Madison	1,888
<input type="checkbox"/> Merritt Island	1,659
<input type="checkbox"/> Crab Orchard	990
<input type="checkbox"/> Arthur Marshall	868
<input type="checkbox"/> Kenai	710
<input type="checkbox"/> Lacassine	647
<input type="checkbox"/> Imperial	644
<input type="checkbox"/> DeSoto	604
<input type="checkbox"/> Laguna Atascosa	590
<input type="checkbox"/> Wheeler	520
<input type="checkbox"/> Rachel Carson	510

Forty-seven (47) refuges reported between 100 and 500 activities. The remaining 385 recorded 100 activities or fewer.

Additional characteristics emerge from the activity profile:

- 18 refuges (4%) reported no law enforcement activity at all for the past three years
- 209 refuges (47%) reported increases in activity
- 16 (4%) reported the same level of activity.

Comparisons could not be made for 95 refuges (21%) due to incomplete data.

SECTION 9: CRIME CLEARANCES

A crime is considered cleared when a suspect is arrested and charged with an offense. Crimes are also cleared by “exceptional” means. Example: sufficient evidence is present to place charges against a suspect, however some element beyond the control of the police precludes this from happening. Clearance data are not readily available from the NWRS. The System is able to supply data for one year only, 1997. (Table 8.)

Clearance rate for serious (Part I) crimes was 14% in 1999. The national average was 21% in 1998. The violent crime clearance rate of 44% lagged behind the national rate of 49%. The property crime clearance rate of 13% was below the 17% rate nationwide. The NWRS clearance rate exceeded the national rate in two categories, rape and arson. Both rapes reported in 1999 were cleared as were 51 of the 275 arsons. The NWRS clearance rate was below the national averages in the remaining categories.

Table 8				
REFUGE CRIME CLEARANCE 1997				
Category	Total	Cleared	Rate	National Average – 1998⁽¹⁾
Murder	7	4	57%	69%
Rape	2	2	100%	50%
Robbery	0	N/A	N/A	28%
Aggravated Assault	<u>16</u>	<u>5</u>	<u>31%</u>	<u>59%</u>
Violent Crime	25	11	44%	49%
Burglary	97	12	12%	14%
Theft	197	12	6%	19%
Motor Vehicle Theft	61	5	8%	14%
Arson	<u>275</u>	<u>51</u>	<u>19%</u>	<u>16%</u>
Property Crime	630	80	13%	17%
TOTAL	655	91	14%	21%

⁽¹⁾ Rates for “all agencies” (11,195)

SECTION 10: SERVICE ACTIVITIES

Refuge law enforcement officers render important services to visitors, including search and rescue and emergency medical services. Table 9 profiles service activities for 1997-1999. The data reflect steady decline, 43% overall, attributable to a 59%

decrease in the “other” category. SAR, EMS and education activities increased moderately in number.

“Other” service incidents predominate, accounting for 60-80% of the total. Education activities rank second in volume, ranging from 20-40% in varying years. SAR and EMS are quite marginal comparatively, accounting for 1.4% and 1.1% in 1999.

Table 9					
SERVICE ACTIVITIES 1997-1999					
Service	1997	1998	1999	Change Number	Change Percent
SAR	217	246	315	+98	+45%
EMS	122	63	237	+115	+94%
EDUC	7,490	4,573	8,819	+1,329	+18%
Fires (not arson)	183	--	137	-46	-25%
Other Service Incident	<u>31,562</u>	<u>21,429</u>	<u>12,954</u>	<u>-18,608</u>	<u>-59%</u>
TOTAL	39,574	26,311	22,462	-17,113	-43

SECTION 11: TRAFFIC INCIDENTS

Refuge law enforcement entails a range of traffic activities. “Traffic,” in the refuge setting, involves standard motor vehicles, boats, aircraft, and off-road vehicles. Table 10 displays number of traffic incidents for the five-year period 1995 to 1999.

For the three years for which complete data are available, 1997-1999, number of traffic incidents increased, 4,856, 60%. The change was powered by an extraordinary increase in Off-Road violations, 245%. During this period, Traffic activities declined marginally. For the five-year period they increased measurably, 36%. Boat incidents are on the increase. Aircraft incidents are decreasing. Annual fluctuations, extreme in all cases, characterize each category of traffic incident.

Table 10							
TRAFFIC INCIDENTS 1995-1999							
	1995	1996	1997	1998	1999	Change - Number	Change - Percent
Traffic	3,423	3,798	4,804	3,423	4,642	+1,219	+36%
Boat	945	824	1,051	945	1,886	+941	+100%
Aircraft	220	195	409	1,435	208	-12	-5%
Off-Road	--	--	<u>1,792</u>	<u>1,302</u>	<u>6,176</u>	--	--
TOTAL	4,588	4,817	8,056	7,105	12,912	8,324	+181%
Change-Number		+229	+3,239	-951	+5,807	--	--
Change-Percent		5%	+67%	-12%	+82%	--	--

SECTION 12: RESOURCES – EXPENDITURES

Expenditures for law enforcement for the three-year period 1997-1999 were:

<u>Year</u>	<u>Expenditures</u>	<u>Change – Number</u>	<u>Change – Percent</u>
☐ FY 1997	\$10,045,000	--	--
☐ FY 1998	\$10,866,000	\$ 821,000	8.1%
☐ FY 1999	\$14,481,000	\$3,615,000	33.3%

For the period, expenditures increased \$4,436,000, 44%. These data include expenditures for boundary posting materials and staff time for maintaining boundary postings, which NWRS officials indicate skews the data (toward the high side).

Law enforcement is not segregated in national or refuge budgets. Expenditures are covered from general refuge funds. The national budget includes two law enforcement line items: \$300,000 for applicant background investigations; and \$500,000 from the Office of National Drug Control Policy for drug programs. FLETC has a law enforcement budget.

SECTION 13: RESOURCES – STAFFING

The NWRS employs 602 Refuge Officers, 62 full-time (10.3%) and 540 collaterals (89.7%). (Data as of October, 2000.) Full-time officers commit their entire work week to law enforcement activity. Collaterals commit widely varying amounts of time. The NWRS was not able to supply staffing trends data for recent years.

SECTION 14: RESOURCES – STAFF DAYS

Staff days consumed in law enforcement provides another and a more precise measure of law enforcement staffing. Total number of staff days committed to law enforcement by both classes of refuge officers for the three-year period 1997-1999 were:

<u>Year</u>	<u>Total Staff Days</u>	<u>Change – Number</u>	<u>Change – Percent</u>
<input type="checkbox"/> FY 1997	39,129	--	--
<input type="checkbox"/> FY 1998	41,276	2,147	5.5%
<input type="checkbox"/> FY 1999	48,842	7,566	18.3%

For the period, number of hours increased 9,713, 24.8%. Refuge-specific data can be found in Appendix 2. As is the case with expenditures, NWRS officials indicate that these data are skewed (again, toward the high side).

The 48,842 8-hour days committed to law enforcement in 1999 factors out to 244 full-time equivalents (FTE's). Using a law enforcement industry average of 1,600 on-duty hours per year, about 200 8-hour workdays/shifts, the NWRS law enforcement workload is being handled by the equivalent of 244 officers (48,842 ÷ 200). This work is distributed among 62 full-time officers who devote their entire workday to law enforcement and the equivalent of 182 collateral duty officers. The 62 officers are investing 12,400 days (62 x 200), 25% of the total, leaving 36,442, 75%, to 540 collaterals, spread over 530 refuges. This calculation suggests that collaterals average 67 eight-hour shifts annually (36,442 ÷ 540), about one-third of their work year (an estimate of 201 on-duty days and about 1.7 days per week (one-third of five days). We do know from the data array in Appendix 2 that staff days are not distributed evenly among refuges and officers.

Four refuges, less than one percent of the total for which data are available (446), accounted for 11.3% of reported staff days in 1999. Twelve others, 2.7%, accounted for an additional 16.2%. The 16 refuges named below account for 28% of total staff days committed to law enforcement.

<u>Refuge</u>	<u>Staff Days – 1999</u>
<input type="checkbox"/> Rocky Mountain Arsenal	2,103
<input type="checkbox"/> Kenai	1,277
<input type="checkbox"/> Chincoteague	1,073
<input type="checkbox"/> Crab Orchard	1,050
<input type="checkbox"/> Edwin Forsythe	918
<input type="checkbox"/> Devil's Lake	863
<input type="checkbox"/> Arthur Marshall	831
<input type="checkbox"/> Wichita Mountains	830
<input type="checkbox"/> Don Edward	671
<input type="checkbox"/> Okefenokee	600

<u>Refuge</u>	<u>Staff Days – 1999</u>
<input type="checkbox"/> National Key Deer	600
<input type="checkbox"/> Cache River	540
<input type="checkbox"/> Parker River	538
<input type="checkbox"/> Patuxent	535
<input type="checkbox"/> Cabeza Prieta	509
<input type="checkbox"/> Chase Lake WMD	500

One hundred twenty-one (121) refuges reported between 100 and 500 law enforcement staff days. The remaining 309 reported 100 staff days or fewer.

SECTION 15: RESOURCES – WORK DISTRIBUTION

Officers' own estimates of how much time they devote to law enforcement work are:

<u>Time Committed</u>	<u>Officers – Number</u>	<u>Officers – Percent</u>
<input type="checkbox"/> 0-20%	102	33.9%
<input type="checkbox"/> 21-40%	70	23.3%
<input type="checkbox"/> 41-60%	52	17.3%
<input type="checkbox"/> 61-80%	18	6.0%
<input type="checkbox"/> 81-100%	<u>59</u>	<u>19.6%</u>
	301	100.0%

These estimates, from the Workforce Survey (see Chapter III), are disaggregated in Table 11.

<u>Class</u>	<u>Time Commitment (%)</u>	<u>Officers - Number</u>	<u>Officers - Percent</u>
<input type="checkbox"/> <u>Full Time Officers</u>	<input type="checkbox"/> 0 – 20	0	0
	<input type="checkbox"/> 21 – 40	1	2.4%
	<input type="checkbox"/> 41 – 60	2	4.8%
	<input type="checkbox"/> 61 – 80	3	7.1%
	<input type="checkbox"/> 81 – 100	36	85.7%
<input type="checkbox"/> <u>Refuge Operations Specialists</u>	<input type="checkbox"/> 0 – 20	44	40.7%
	<input type="checkbox"/> 21 – 40	33	30.6%
	<input type="checkbox"/> 41 – 60	18	16.7%
	<input type="checkbox"/> 61 – 80	5	4.6%
	<input type="checkbox"/> 81 – 100	8	7.4%
<input type="checkbox"/> <u>All Others</u>	<input type="checkbox"/> 0 – 20	58	38.4%
	<input type="checkbox"/> 21 – 40	36	23.8%
	<input type="checkbox"/> 41 – 60	32	21.2%
	<input type="checkbox"/> 61 – 80	10	6.6%
	<input type="checkbox"/> 81 – 100	15	9.9%

SECTION 16: STAFF PROFILE

Tables 12, 13, 14 and 15 profile important characteristics of NWRS law enforcement officers and managers. These data, culled from the workforce surveys, constitute a large, self-selected sample.

NWRS law enforcement officers span the entire range of age categories. (Table 12.) About 75% of law enforcement officers are in 31-50 age ranges. Two sizeable sets of officers cluster in the ranges on either side of the 31-50 groupings. Full-time refuge officers are marginally younger than the staff as a whole. Just over 60% are 40 or under, compared to 50% for remaining classes. Managers are considerably older. Close to 70% are in the 41-55 range. Ten percent (10%) are in the 56-60 age bracket.

Table 13 arrays the experience level of 307 law enforcement officers and 236 managers. Eighty-three percent (83%) of officers who conduct law enforcement work have been with the FWS for six or more years. Almost half have 10 years of service or more. At the front-end of the continuum are 11% of officers (10.7%) who have three years of service or less. Almost 100% of managers have six or more years of service with the FWS. Over 90% have 10 or more years of FWS service.

Table 14 displays the experience of 302 officers and 236 managers in current positions. For officers, experience is distributed throughout the continuum with major clusterings at the 1-2, 3-4, 10-14, and 20 or more brackets. Experience distribution within position classes also reflect widespread dispersion. Experience of managers in current positions clusters at the back-end of the continuum, especially in the 10-14 and 20 or more brackets.

Managers have substantial law enforcement experience:

<u>Years</u>	<u>Number of Managers</u>	<u>Percent of Managers</u>
0	24	10.2%
1-2	7	3.0%
3-4	7	3.0%
5-9	28	11.9%
10-14	55	23.4%
15-19	44	18.7%
20+	<u>70</u>	<u>29.8%</u>
	235	100.0%

Over 80% of managers (83.8%) have five years of service or more as a refuge law enforcement officer. Ten percent (10%) have none.

Table 15 profiles the education of 295 officers and 236 managers. Eighty-five percent of officers have a bachelor's degree or higher. Almost 21% have a graduate degree. The educational credentials of managers are higher. Almost 100% have bachelors or graduate degrees.

Table 12										
AGE PROFILE										
	20-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61+	Total
Refuge LE Officer – FT	3	5	11	7	7	6	2	1	–	42
Refuge Operations Spec.	2	8	30	15	14	22	7	1	–	99
Outdoor Recreation Planner	–	–	1	14	1	5	1	1	–	23
Police Officer	–	1	3	1	–	1	–	–	–	6
Maintenance Worker	–	2	–	3	4	2	4	3	1	19
Park Ranger	1	2	3	2	–	2	2	1	–	13
Biological Technician	–	4	2	2	1	1	2	1	–	13
Refuge Biologist	–	4	4	2	2	8	4	–	–	24
Other	–	<u>3</u>	<u>11</u>	<u>14</u>	<u>16</u>	<u>14</u>	<u>8</u>	<u>2</u>	<u>1</u>	<u>69</u>
TOTALS	6 (2.0%)	29 (9.4%)	65 (21.2%)	60 (19.5%)	44 (14.3%)	61 (19.9%)	30 (9.8%)	10 (3.3%)	2 (0.1%)	307
Managers	0	2 (0.8%)	11 (4.6%)	29 (12.2%)	40 (16.9%)	71 (30.1%)	55 (23.3%)	24 (10.1%)	4 (1.6%)	236

Table 13
EXPERIENCE PROFILE - 2000
YEARS WITH FWS

	0-1	2-3	4-5	6-7	8-9	10-11	12-15	16-20	21-25	26-30	30+	TOTAL S
Refuge LE Officer – FT	4	8	5	6	1	2	6	4	4	–	–	40
Refuge Operations Spec.	–	4	4	6	11	27	23	9	23	1	1	109
Outdoor Recreation Planner	–	1	1	–	3	–	–	1	4	–	–	10
Police Officer	1	–	1	1	1	1	–	–	1	–	–	6
Maintenance Worker	–	1	1	–	2	2	4	4	4	2	–	20
Park Ranger	3	–	3	–	1	2	1	–	3	–	–	13
Biological Technician	1	4	–	–	1	2	1	–	–	1	2	12
Refuge Biologist	–	3	3	1	–	3	2	–	6	4	–	22
Other	–	3	–	6	12	8	7	11	22	5	1	75
TOTALS	9	24	18	20	32	47	44	29	67	13	4	307
	(2.9%)	(7.8%)	(5.9%)	(6.5%)	(10.4%)	(15.3%)	(14.3%)	(9.4%)	(2.2%)	(4.2%)	(1.3%)	
Managers	3	4	1	4	8	14	23	36	85	34	24	236
	(1.2%)	(1.6%)	(0.4%)	(1.7%)	(3.4%)	(6.0%)	(9.8%)	(15.1%)	(36.1%)	(14.3%)	(10.1%)	

Table 14							
EXPERIENCE PROFILE – 2000							
CURRENT POSITION							
	1-2 Years	3-4 Years	5-9 Years	10-14 Years	15-19 Years	20 or More	TOTALS
Refuge Law Enforcement Officer FT	15	6	11	7	3	14	56
Refuge Operations Specialist	14	33	–	24	12	12	95
Outdoor Recreation Planner	1	3	1	1	1	3	10
Police Officer	1	3	–	1	–	1	6
Maintenance Worker	2	1	–	8	3	5	19
Park Ranger	3	3	3	2	1	1	13
Biological Technician	3	2	2	2	1	2	12
Refuge Biologist	5	3	6	5	1	2	22
Other	<u>11</u>	<u>15</u>	<u>19</u>	<u>10</u>	<u>7</u>	<u>7</u>	<u>69</u>
TOTALS	55 (18.2%)	69 (22.8%)	42 (13.7%)	60 (19.5%)	29 (9.4%)	47 (15.6%)	302
Managers	17 (7.2%)	19 (8.1%)	41 (17.4%)	62 (26.4%)	36 (15.3%)	60 (25.5%)	236

Table 15							
EDUCATION							
	High School	Some College	Associate Degree	Bachelors Degree	Graduate Work	Graduate Degree	TOTALS
Refuge LE Officer FT	3	14	4	19	2	–	42
Refuge Operations Specialist	–	–	1	75	3	30	109
Outdoor Recreation Planner	–	–	–	8	1	1	10
Police Officer	–	2	–	4	–	–	6
Maintenance Worker	1	10	4	2	2	–	19
Park Ranger	–	–	1	7	2	3	13
Biological Technician	–	2	4	5	1	–	12
Refuge Biologist	–	–	–	14	–	8	22
Other	=	=	—	<u>40</u>	<u>3</u>	<u>19</u>	<u>62</u>
TOTALS	4 (1.4%)	28 (9.5%)	14 (4.7%)	174 (60.0%)	14 (4.7%)	61 (20.7%)	295
Managers	0	1 (0.4%)	3 (1.3%)	128 (54.2%)	36 (15.3%)	68 (28.8%)	236

SECTION 17: LINE OF DUTY DEATHS AND ASSAULTS

Since 1996, at least 14 refuge law enforcement officers have been assaulted, 11 in 1996, none in 1997, and three in 1999. (No data are available for 1998.) (Table 16.) In 1999, there were 619 refuge officers. The officers assaulted rate was 0.5%.

Table 16						
OFFICERS KILLED/ASSAULTED 1996-1999						
	1996	1997	1998	1999	Change Number	Change Percent
Killed	0	0	N/A	0	0	--
Assaulted	11	0	N/A	3	-8	-72%

SECTION 18: OBSERVATIONS

The foregoing factors and trends have important implications for policing the NWRS – today and tomorrow. Combined with other study information they inform judgements concerning the capacity of the law enforcement function to contribute to the core mission of the FWS.

- **The System.** The breadth and diversity of the System demand local, refuge-based management of and accountability for the law enforcement function. The current Project Leader-based authority and accountability structure is the proper model for the NWRS and should be retained. Strengthened centralized efforts at the national and regional levels are recommended later in the report.

The sheer number of refuges, extreme variations in size and visitation, geographical dispersion, long distances between refuges, and, in many instances, isolation, complicate and challenge management of the law enforcement function. This configuration of factors limits potential for standardization, resource leveraging, interpersonal communication, and management proximity.

- **Visitation.** Population is a powerful correlate of law enforcement requirements. Population growth, law enforcement workload, and resource requirements correlate positively. Visitation is the NWRS equivalent of “population.” It is a primary service base.

Visitation is increasing at an annual average of 6.6%. Between 2.3 and 2.6 million additional visitors will have to be serviced by refuge officers for the next several years. Visitation can be expected to reach 42,000,000 by 2002. Unused law enforcement capacity does not currently exist. Accordingly, the visitation trend argues for staff augmentation. Augmentation, if and when it occurs, must be cost-justified not only on overall/ macro trends but on a refuge-by-refuge basis.

- **Visitor Safety.** Refuges are very safe places for visitors. Approximately two of every 100,000 visitors are victims of serious crime, and that crime is far more likely to be a property crime than a violent (person) crime. The comparable victimization rate for the National Park Service, also a very safe place, is less than one visitor per 100,000 (serious crime). The comparable rate nationally in 1999 (all cities and towns reporting Uniform Crime Statistics) was 4,619 serious crimes per 100,000 inhabitants. Rate of violent crimes was 568/100,000.

- **Serious Crime.** Unacceptable rates of serious crime, crime that is trending upward, and or unacceptable levels of specific crimes, especially violent crimes, require intense and immediate response – program initiatives, technology, staff increases, or a combination. None of the foregoing conditions prevail in the NWRS policing environment. Fewer than 700 serious crimes are reported annually. A majority of refuges do not report even one violent crime a year. No individual offense type occurs in number or a rate which is a basis for more than ordinary concern. Serious crime has been trending upward, attributable, to increases in reported arsons. Nothing in the NWRS serious crime profile suggests a need for staffing augmentations, nor special intervention, except the trend in arsons, a particularly threatening crime for many heavily forested refuges. The increase in serious crime is consistent with visitation changes.

- **Less Serious Crime.** Less serious crime is far more prevalent than serious crime, but still marginal in rate of occurrence on many refuges. Successive decreases in 1998 and 1999 are notable. Despite substantial increases in visitation, the incidence of less serious crime in 1999 paralleled that of 1995. This relationship is not consistent with visitation trends, overall, but is in selected areas, vandalism being most evident.

Trends exist in several offense categories that FWS law enforcement managers should explore and explain. The precipitous decline in natural resource violations in 1999, 35% lower than 1998, and 47% lower than in 1997, is compelling. Being a product of proactive initiative, declines of this nature can be attributable to deliberate reversal of law enforcement emphasis, indifference, staffing/time shortfalls, or any combination thereof. We do not believe that resource violations are declining in fact. This does

not seem plausible in view of recent historical incidence (reported) and visitation trends.

The dramatic increase in vandalism, 132% in five years, 27% higher in 1999 than in 1996, the previous peak, clearly requires analysis, exploration, and immediate response. Increases in weapons and drug abuse violations promote questions. In each case, causation may lie in more aggressive law enforcement work, expanding problems, or both.

NWRS speculate that trends may be due to decreased emphasis by inexperienced refuge officers, extra funds for drug work, “sensationalism” of weapons violations, and competing time demands with no incentives to work on law enforcement reports. It is the responsibility of NWRS managers to clarify and confirm causation in all categories.

With regard to all the four offense situations cited, if crime analysis confirms a resource shortfall causation or a burgeoning problem, staffing augmentation is indicated.

- **Other Offenses.** Reported data reflects increasing incidence of offenses in this class, which would be expected in view of visitation trends. The trend is also characterized by extraordinary annual fluctuation, the magnitude of which calls the reliability of data into question. The data are, simply, too erratic to be believable.

The NWRS is advised to reconsider its reporting format for this class of offenses. Issuing other offense data in aggregate form conceals specific trends and problems which may exist and limits development of targeted responses. If there is any validity whatsoever to the other offense data, the increase would be consistent with refuge use/visitation trends.

Refuge Law Enforcement Activity. The increase in total activity between 1997 and 1999, 36%, is substantial. This increase is not consistent with or explained by Part I and II crime patterns, which it should be to a degree. The 8,703 event increase in total law enforcement activity from 1997 to 1999 has been paralleled by a 4,743 decline in Part II incidents, producing a “gap” of 13,446 events.

Reliability concerns notwithstanding, law enforcement activity data are instructive. The data demonstrate ever so clearly the degree to which the System is composed of refuges where law enforcement events are highly episodic. Almost 400 refuges record a law enforcement event 100 or fewer times each year, one every three-to-four days. About 10% experience moderate activity, 100-500 per year, about one a day. Only 14 refuges (3%) report 500 or more law enforcement events annually. Based on

reported activity alone, most refuges cannot cost-justify full-time law enforcement officers. Collateral duty must remain a prominent practice.

Simultaneously, the activity pattern calls for alternative forms of law enforcement organization. Law enforcement officers, full-time and collateral, are currently assigned/restricted to one refuge. Ingrained refuge-by-refuge, full-time or collateral staffing practice inhibits innovation. Multiple-refuge staffing models should be considered. To proceed productively, the NWRS needs a rational, data-driven refuge law enforcement officer allocation and deployment scheme, an asset it does not possess at this time.

- **Clearances.** Nationally, about one in five (21%) serious crimes is cleared. The refuge system law enforcement program does less well, clearing 14%. This is attributable in large measure to the transience of the refuge population and the limited corps, geographical dispersion, and priorities of investigative specialists – the staff of the Division of Law Enforcement. The NWRS is simply not positioned to perform as well as many law enforcement agencies. Still, a detailed review of investigative practices is warranted, with a focus toward improvement. Like residents of communities across the country, visitors expect refuge law enforcement to close cases, bring offenders to justice and return property.

- **Service Activities.** By conscious choice, absence of conscious choice, or due to staff shortages and transcending refuge priorities, NWRS law enforcement personnel are no longer servicing clientele to the degree they did in the very recent past. For the three-year period 1997 to 1999 service activities declined 43% (17,113 incidents), attributable in entirety to a 59% decline in one category “other service incidents.” This phenomenon deserves analysis, and perhaps response.

As with the “Other Offenses” category (Section 7), the absence of detail concerning what “Other Service Incidents” comprise precludes examination of the components of the decline. This is another database issue for the NWRS to address. The overall decline, assuming reliability of reported data, poses a series of questions which we cannot either analyze or answer due to the aggregation of services.

- **Traffic.** Traffic incidents have increased almost 200% since 1995 and by more than half since 1997. Off-road violations have exploded in number. The magnitude of the increase, most of it in 1999, signals deliberate law enforcement intervention and proactivity.

Further detail on traffic activity, particularly number of crashes, substance abuse causation, and violator profiles, would assist understanding and

planning of further interventions significantly. Each of these data areas would supply valuable information for prevention and control.

As a workload component, traffic incidents are very meaningful, not rivaling but distantly approaching less serious crimes in volume (13,000 vs. 17,000 in 1999).

- **Law Enforcement Staffing.** The staff days calculation, coupled with visitation trends establishes a prima facie case for staffing supplements. An FTE law enforcement complement of 244 officers, 90% of whom spend two-thirds of their time on other duties, seem quite modest. Our estimate of 244 is for 1999. Equivalents for 1997 and 1998 would be substantially lower.

The NWRS and FWS tend to frame staffing considerations – thinking and perhaps, decisions, on a base of 602, most of whom are collaterals. This number clearly misrepresents the reality. Staffing considerations should proceed from a base of 244. This should alter focus, foster more penetrating analysis, and produce more cogent staffing decisions.

- **Expenditures.** The absence of expenditures detail and staffing trends data precludes analysis of and judgements about funding levels generally and historically, and the significance of the 44% increase in expenditures between 1997 and 1999.

The \$14.5 million expenditures for law enforcement in 1999 contrasts with \$94.5 spent by the National Park Service for law enforcement the same year. The NWRS is policing 530 refuges. The NPS is policing 373 park units. The NWRS is funding the equivalent of 244 law enforcement officers. The NPS is funding 2,200 rangers, full-time and seasonal. NWRS visitation was 35 million in 1999. NPS visitation was 436 million. NWRS acreage is 93.5 million. NPS acreage is 92 million. Configurations and law enforcement demands of the two systems differ in major ways, as do current law enforcement cultures. The data do not suggest that NWRS law enforcement expenditures are grossly out of balance, with those of the NPS, either high or low. It is very significant to note that a recent IACP study concluded that NPS law enforcement is “under-resourced.”

- **Line-of-Duty Deaths and Assaults.** Line-of-duty deaths and assaults are minimal. Three assaults occurred in 1999. NWRS data show no line-of-duty killings. Positive statistics notwithstanding, refuge officers are continually exposed to danger. Many refuge users are armed, hunters in particular. Substance use and abuse is part of the American culture today. Back-up is a priority concern throughout the System, properly so. Priority must always be accorded to officer safety.

- **Staff Profile.** Overall, the staff profile bodes well for 21st Century organizational transformation. Change occurs most effectively in mature organizations with well-educated and experienced staffs. Law enforcement staff is highly educated. The heaviest concentration of advanced education are among refuge operations specialists, park rangers and biologists. Managers have even higher levels of education.

Special initiatives are required when an agency has a substantial cadre of young and/or modestly experienced law enforcement officers. These include intense supervision and mentoring, more frequent performance evaluation, and higher degrees of remedial in-service training. The NWRS appears to be in this position. While the spread and blend of experience among law enforcement officers with the FWS is normal (statistically), the same pattern does not prevail with regard to experience in law enforcement positions. Substantial clusters of short tenures exist. Almost 20% of law enforcement officers have two years experience or less in their current positions. Another 22% have four years of experience or less in current positions.

The brevity of these experience tenures become more problematic when the infrequency of law enforcement events in most refuges is considered. Far too many law enforcement officers simply do not accumulate law enforcement event experience to the degree required for confidence and safety. Innovations in training and assignment practices are called for to compensate for this condition.

SECTION 19: SUMMARY

We convey these summary judgements of the implications of factors and trends with a sober wariness rooted in distrust of the completeness and reliability of NWRS data. Still, we suggest that the factors and trends portray expanding law enforcement requirements. Visitation is increasing materially, over two million visitors annually. Growth is spawning increases in serious crime, other offenses, law enforcement activity, traffic incidents, and staff day/resource commitments to law enforcement. Threat to the core objective of the NWRS – conserving wildlife and their habitats, emerge from trends data. Vandalism increases are pronounced. Proactive commitment to prevention of resource and ARPA violations may be diminishing in priority, eroding, not being reported, or passed on to other law enforcement agencies. The shift toward public use generated law enforcement requirements commented upon by so many refuge managers and officers during our field visits is in evidence, statistically. Drug abuse, marijuana cultivation, drug trafficking, drunkenness, weapons violations, illegal alien activity, and liquor law violations are all on the increase.

These conditions call for increased investment in law enforcement – for programs, staff, and technology.

To retain the currently excellent level of safety for System visitors/users and to intensify the law enforcement proactivity that is so central to achieving the core mission, NRWS leaders should enhance the quantity and quality of law enforcement. Quantity enhancement could come from the current complement of collaterals, by committing a greater degree of their time to law enforcement, or from augmentation – new positions. The law enforcement complement of the NWRS is modest, the equivalent of 250 officers for a System composed of 530 refuges, 37 wetland management areas, and 93.5 million acres. Accordingly, augmentation does not seem to be achievable within current capacity, by reordering duty priorities among collaterals, without sacrifice to other equally crucial NWRS functions. New positions are in order. Quality enhancement is more likely to occur through the addition of full-time officers who, for many reasons, bring or develop greater law enforcement interest, intensity, and experience.

The potential of an enhanced law enforcement function cannot be maximized within the current organizational, cultural, and program framework. The current framework is studded with management and operational flaws. Expansion must occur within the context of a New Vision of law enforcement. In addition to increasing law enforcement staff capacity – quantitatively and qualitatively, foundations of the New Vision should consist of:

- ❑ A more powerful voice for law enforcement at the national FWS executive level
- ❑ Increasingly unified systemwide practices, achieved through greater clarity of objectives and more coherent policies and procedures
- ❑ Innovation in refuge law enforcement organization and service delivery
- ❑ Rational, data-driven officer allocation and deployment
- ❑ Technology, equipment, and information supplements for field personnel
- ❑ A comprehensive central support system for the law enforcement function
- ❑ More professional and effective recruitment and selection processes
- ❑ Intensified law enforcement training
- ❑ Strengthened research, analysis, and planning support for refuges and field officers
- ❑ A management-tailored data system
- ❑ A predictable and protected funding stream.

The Vision should include and reinforce the many strengths of the current law enforcement program including decentralization, open and vibrant interpersonal communications, and an impressive congruence of attitudes and perspectives among System law enforcement managers and officers.

CHAPTER II: THE LAW ENFORCEMENT INFRASTRUCTURE

The capacity of the NWRS to meet its protection and law enforcement obligation depends upon the level and quality of resources committed and how resources are organized, managed, programmed and controlled. This chapter examines a number of these infrastructure considerations: organization; staffing; objectives; policies and procedures; recruitment, selection and promotion; training; professional standards; and data systems. The chapter also offers a lengthy series of recommendations that will help lay the foundations for the new vision of the NWRS law enforcement sketched in the summary of the preceding chapter.

SECTION 1: THE NWRS LAW ENFORCEMENT CULTURE

A series of attributes frame the NWRS law enforcement culture. They are correlates of the infrastructure conditions and practices examined in this chapter and will heavily influence the pace and success of implementation of recommendations made on the pages that follow, should the NWRS wish to implement them. Some attributes bode well for successful organizational and cultural transformation. Most do not – these are better viewed as challenges.

- ❑ **The Prime Asset.** The law enforcement workforce, both full-time and collateral duty, is genuinely dedicated to the FWS mission. Full-time personnel are well trained and deliver quality law enforcement services. Collateral duty officers work to the best of their competencies, which relate directly to the frequency with which they perform law enforcement duties. All enforcement staff, managers, and officers are highly educated.
- ❑ **Readiness for Change.** Field interviews with both managers and officers, demonstrate an institutional readiness to change current law enforcement conditions, including increased emphasis on the addition of full-time officers and elevation to equal status with other NWRS service functions. Both classes express frustration with secondary status accorded to law enforcement by the FWS.
- ❑ **Secondary Status.** The USFWS employs many means to protect wildlife and natural resources. The law enforcement mission appears to be looked upon as necessary but not as vital to FWS operations as number of other functions. Although the first wildlife officer had law enforcement powers, a reading of the organization's history indicates that the law enforcement authority was granted as an add-on or additional duty, to be used only in rare cases when needed. Secondary status is reinforced and has been historically, by a "tolerance," of public use focus and activity.
- ❑ **A Changing Refuge Environment.** Only in recent years has an organized public use and visitation marketing effort been undertaken. The number of

visitors is increasing measurably. This increase is bringing many of the problems typically confronted by state and local law enforcement agencies such as drug use; alcohol-related incidents, including DUI; person-to-person crime; homeless-related activity; and gang and sexually-deviant incidents. This trend should continue, changing the refuge dynamic.

- **An Unfinished System.** Not surprising in view of the preceding attribute, we find an “evolved” law enforcement function rather than a carefully considered and constructed system comprised of the full complement of the essential components required to satisfy requirements of a law enforcement system. We find randomness rather than design.
- **Law Enforcement Balkanization.** The law enforcement function is locally controlled and administered with marginal guidance from the national level. This results in fragmented and inconsistent approaches to law enforcement service delivery, with insufficient accountability for accomplishment or monitoring, of all levels.
- **Underserved Refuges.** The full-time and collateral duty law enforcement mix is a problem in many areas, ranging from personnel to safety. In refuges with the collateral duty officers only, the majority, the law enforcement commitment is quite limited. In some sites visited, no law enforcement operations are visible, due to the demands of primary duty assignments. We have been made aware of refuges that have no weekend law enforcement coverage.
- **Refuge-Bound Allocation and Deployment.** The foregoing condition is directly attributable to the absence of a governing, professionally rationalized staffing allocation and deployment plan. The condition is further aggravated by the “refuge-bound” nature of resource and acquisition practices. Managers, perhaps as a result of extreme decentralization of responsibility, do not tend to think beyond the zones of their own refuge. This is not inconsistent with practices in any organization in which competition for finite resources is prevalent.
- **Dominance of Collateral Duty.** The Service relies primarily on collateral duty officers whose primary activities concentrate on non-law enforcement refuge preservation tasks. This system assumes and requires that an employee with a mixed set of job requirements can conduct law enforcement functions effectively whenever demand occurs. The system exhibits distinct operational/performance flaws:
 - The law enforcement competencies of collateral duty officers degrade directly with lack of utilization of law enforcement skills

- Officers who do not employ law enforcement skills with requisite frequency are at greater risk for failure and possible injury when attempting to employ the skills
- Focus on law enforcement is diluted, reducing funding potential and appreciation for linkage to the core mission.

At the same time, the collateral system is the only cost-justifiable approach to law enforcement in the majority of refuges, as the NWRS is presently organized for law enforcement.

- **Primitive MIS Capacity.** The law enforcement management function suffers from the absence of a database and data capture capability that is reliable and accessible at the refuge, regional, and national level for effective crime analysis, resource deployment, and goal/objective achievement. This problem flourishes, in part, by minimized demands from headquarters for data-justified evaluation of law enforcement success or failure.

SECTION 2: ORGANIZATION

The USFWS law enforcement authority, operations, and responsibilities are distributed among executives and officers at three levels and locations:

- FWS/NWRS executive level in Washington
- Regions
- Refuges.

System operations are highly decentralized and characterized by delegation of substantial power to refuge managers.

USFWS/NWRS – Washington. Principal law enforcement executive/line officials and support staff at the Washington headquarters level are: the Director of the Fish and Wildlife Service; the Chief of the National Wildlife Refuge System; Visitor Services and Communications Division Chief; the National Refuge Law Enforcement Coordinator; and the National Refuge Training Coordinator.

The Director of the Fish and Wildlife Service, the chief executive officer, has ultimate responsibility for refuge law enforcement – vision; goals; objectives; resources; programming; performance; and control. The Director reports to the Assistant Secretary for Fish, Wildlife, and Parks.

Refuge protection/law enforcement is the responsibility of the Refuge Program, which is located within the Division of Visitor Services and Communications, a component of the National Wildlife Refuge System (NWRS). (See Figures 1 & 2.) The NWRS consists of four divisions and two offices, each organized and staffed to supply essential central services: Air Quality; Fire Management; Information Management; Outreach and Visitor Services; Planning and Policy; Tactical Services; Wildlife Resources. An operational law enforcement branch has not been established at the national level.

There are three positions in the Visitor Services and Communications Division that provide law enforcement support services, the National Refuge Law Enforcement Coordinator, the National Refuge Law Enforcement Training Coordinator and the Administrative Technician. The National Refuge Law Enforcement Training Coordinator and the Administrative Technician are located at the Federal Law Enforcement Training Center in Glynco, Georgia.

The Law Enforcement Coordinator focuses on policy development, personnel issues, planning, and special projects. The position has no direct control over Regional Refuge Law Enforcement Coordinators or refuge LEOs. While assignments come from a variety of persons at the headquarters level, the National Refuge Law Enforcement Coordinator reports to the Division Chief, Visitor Services and Communications.

The National Refuge Law Enforcement Training Coordinator coordinates development, scheduling, and delivery of entry-level and in-service training of refuge LEOs and management and supervisory training. The liaison reviews in-service training which is developed by regions and is responsible for issuing personal equipment to recruits (including weapons, leather gear, ballistic vests, etc.).

The DOI Law Enforcement Administrator, organizationally sited in the Office of the Secretary of the Interior, is responsible for law enforcement policy and policy compliance of the five agencies of the DOI that conduct law enforcement operations: the U.S. Fish and Wildlife Service; National Park Service; U.S. Park Police; Bureau of Land Management; and the Bureau of Reclamation. This obligation is exercised through the Office of Managing Risks and Public Safety (MRPS). MRPS is empowered to promulgate law enforcement policy, procedures, and standards; coordinate and monitor implementation of law enforcement programs, through a standardized inspections program; and approve and clear candidates for bureau or law enforcement administrator positions.

Regions. The regional law enforcement chain of command consists of the Regional Director; a Regional Chief of NWRS; and a Chief of Refuge Operations or equivalent. A Regional Law Enforcement Coordinator functions in a non-line capacity.

Each of the seven regions has a Director, who supervises a Regional Chief of the National Wildlife Refuge System. A Regional Refuge Law Enforcement Coordinator (RRLEC) reports directly or indirectly to the Regional Chief of Refuges. The role of the RRLEC is to coordinate refuge law enforcement activities within the region. RRLEC

Figure 1

Figure 2

duties vary by region. In most, activities concern personnel, training, equipment purchase, and allocation of drug funds. The RRLEC may coordinate development of regional policy. The more proactive coordinators interact, inter-regionally, on training and other issues. RRLECs have no direct command authority over LEOs. RRLECs generally hold law enforcement commissions, however some have relinquished them to conform to grade level limitations for commissions. There is a non-command channel from the National Law Enforcement Coordinator, through Regional Refuge Law Enforcement Coordinators, to the refuge level Project Leaders or to senior full-time or collateral duty law enforcement personnel at the refuges.

Refuges. A variety of organization/staffing combinations exist in Refuges. The titles Refuge Manager and Assistant Refuge Manager are held by refuge workers, but refuge management and control is vested in the position of Project Leader. A Project Leader, or at larger refuges or refuge complexes, a Deputy Project Leader or Assistant Project Leader or Refuge Manager, supervises law enforcement. Project leaders prepare the law enforcement portion of the budget and control disbursement of funds. Project leaders may or may not have prior law enforcement experience and may or may not hold law enforcement commissions. On refuges with a full-time commissioned Refuge LEO, supervision of the law enforcement function may be delegated to the most senior of these officers.

Refuge LEO cadres are composed of three types of officers:

- **Full-Time Law Enforcement Officers.** FTLEOs perform law enforcement functions only. They are generally in the 083 police officer classification. They function at full performance level, GS-7/8. Recently developed position descriptions will reclassify this position to the GS-0025 park ranger series. No supervisory positions exist for this class of officer. However, officers with position titles such as Refuge Manager and Operations Specialist perform full-time law enforcement operations (at the GS-11 level) and are considered by Project Leaders to be supervisors of the law enforcement function. All are trained at FLETC.

- **Seasonal Law Enforcement Officers.** SLEOs have the same authority as FTLEOs, but only within the boundaries of the refuge. They cannot enforce the Migratory Bird Act Treaty or attend the basic training course at FLETC. They receive entry-level training through the NPS college-based seasonal program. They do not attend in-service or specialized training courses. SLEOs are hired on a season-by-season basis. Indications are that FWS will eliminate this category of officers in the near future, relying instead on a cadre of temporary-subject to furlough officers, which will eliminate many hiring problems associated with the seasonal positions. While some SLEOs are eventually hired to career FTLEO positions, no priority or preference points are granted for prior experience.

- **Collateral Duty Officers.** CDLEOs are career employees with a job title in other than the law enforcement series. These individuals, who may be biologists, heavy equipment operators, recreation specialists, or small boat operators, are commissioned at the same authority level as the full-time officer and conduct law enforcement work as one sub-set of daily duties. CDLEOs attend basic training at FLETC, receive in-service training, but may receive additional specialized training if they have the interest.

EVALUATION

The current organization of the NWRS law enforcement function features significant assets. Of greatest value is employment of a decentralized model that accords substantial empowerment, authority and responsibility to Refuge Project Leaders. Our arguments in favor of decentralization were introduced in Chapter I. The regional structure, which apportions over 500 properties and hundreds of employees among seven manageable clusters makes great sense. Placing law enforcement specialists at both the national and regional levels for coordination and problem-solving is a third positive of the current organization scheme.

Despite this positive, law enforcement is not flourishing in the NWRS. This condition is traceable to many causes, a number of them organizational. Of greatest consequence are:

- An insufficiently competitive organizational position in the national structure
- Passive central direction and control of the law enforcement function
- Organizational absence or impotence of crucial law enforcement support functions throughout the System
- Over-reliance on a refuge-by-refuge organizing and staffing model.

Organizational Voice. In the NWRS scheme, law enforcement is a function, not an organizational entity. Unlike Fire Management, also a line safety function, or Wildlife Resources, or even an array of standard support functions including Information Management and Planning and Policy, law enforcement has not been accorded Branch status. The consequences of this condition can be measured in status, internal political power, resources, and acquisition potential. The law enforcement function appears to be limited in each area. We believe this condition to be firmly rooted in the historical NWRS perception of law enforcement as an ancillary function. The changing nature of the police environment supports reconsideration and reorientation of this historical perspective, and including organizational upgrading. Law enforcement requires a more prominent voice in the NWRS "board room."

Direction and Control. The organizational model employed by the USFWS to manage its law enforcement function features decentralization to the lowest level, the refuge. Paralleling benefits, the current model appears to have fostered a hands-off attitude in Washington. We find little evidence of strong command and control of the refuges from Washington, a condition, which echoes to a greater or lesser degree in the regions. One result is a profusion of approaches commented upon earlier, varying in appreciation for law enforcement. Another is absence of law enforcement altogether at many sites. This is also attributable, in large measure, to predominant use of collateral duty personnel, the interest of refuge project leaders in law enforcement, and to varying demand.

An unexpected finding of our examination is the pervasively laissez-faire supervisory style and complete inattention to formal evaluation of law enforcement performance.

Refuge project leaders (or delegated supervisors) prepare LEO performance evaluations, but do not, as a rule, review daily work products or apply oversight to ongoing law enforcement operations. LEOs state that they provide input to project leaders or other supervisors, ad hoc or upon request, but generally conduct daily operations according to self-determined priorities.

There are no supervisory LEOs directly above the officers working at the refuge level. Regional LE Coordinators do not conduct supervisory review functions commensurate with those performed, for example, by sergeants through captains in uniformed division operations in state or local police organizations. One result is little or no comprehensive monitoring of LEO performance and no measurement of law enforcement goal attainment.

Integration. The law enforcement function is regarded as secondary compared to other organizational elements of the FWS. The function is in desperate need of considerable increase in visibility and respect. There are numerous examples of law enforcement losing out to the more recognized and/or more vocal sectors of the agency when in competition for funding and other resources, further generating the priority for identification.

Law enforcement takes a back-seat role to other functions of the refuges. The NWRS does not segregate or earmark funding for law enforcement. Project Leaders are empowered to allocate resources for law enforcement or not to do so. Regardless of initial programming for specific law enforcement expenditures, once funding is allocated, there are no controls to ensure that funds are actually spent for that law enforcement priority. Some funds are allocated and administered at the regional level (for drug prevention or eradication, training, applicant processing), small percentages. Due to the lack of procedure and control from Washington, these funds are managed inconsistently from region-to-region.

Support Activities. The effectiveness of law enforcement executive and field operations depend heavily upon a broad range of quality support services. Absence of

several of these services in the NWRS organization is glaring. Several that exist are under-resourced or lack sufficient organizational foundation.

Internal affairs and inspections are critical law enforcement control components. Best practice advises that these functions be located to report directly to the chief law enforcement official in an agency. While some internal affairs issues are directed to the Office of the Inspector General, these are the most serious allegations only. Middle and lower grade cases are handled by refuges or regions in which they occur – with differing procedures and results. To be consistent, objective and accepted as fair by the members of the organization, this professional standards activity must have more formal organizational status, at the highest level of the System.

An organized and effective inspections program does not exist. We found little evidence of informal inspection practices, including periodic visitation by higher-level personnel of the organization. Many LEOs and managers recall such visits occurring with some frequency in the 1980's, but not since. To ensure that the controls, directives and policy are in place and are working efficiently and effectively, a strong inspectional services program is needed. Like internal affairs, and for the same reasons, this function must be sited, organizationally, at the executive level, and coordinated with internal affairs in a Professional Standards unit.

The potential of the NWRS law enforcement function is measurably impaired by an under-resourced and immature planning function. Absence of headquarters-driven long-range planning is an NWRS organizational flaw. Crime and service analysis is episodic. Data systems, specific to the law enforcement function, work largely in the hands of some regions and individuals spotted throughout the System.

Refuge Law Enforcement Organization. The refuge is the dominant organizing concept at the field level. Law enforcement is approached refuge-by-refuge. This organizing concept, traditional and comfortable to the NWRS, bridles innovation and experimentation. New forms of multi-refuge organization, programming, and resource sharing and leveraging hold promise for the law enforcement function. New forms of organization will open the way to allocate new, and perhaps reallocate current needs driven allocation of law enforcement officers, a concept *developed* further in a later section.

PROPOSED ORGANIZATION

To reposition law enforcement for greater contribution to the NWRS core mission, organizational restructuring is advisable. The organization we recommend is premised upon the need to remedy the shortfalls and exploit the opportunities referenced above, specifically to:

- ❑ Enhance the visibility and competitive position of the law enforcement function at the headquarters level, through the regions, down to the refuge level
- ❑ Intensify central command and control to maximize the effectiveness of ground operations
- ❑ Strengthen support system capabilities to facilitate orderly growth and change and to secure the ongoing effectiveness of law enforcement management and operations
- ❑ Fully integrate law enforcement as a partner in USFWS mission accomplishment
- ❑ Create a management environment that seeks and introduces organizational experimentation
- ❑ Establish a professional standards capability to the integrity of management and operations.

In any set of circumstances, several organizations schemes can work equally well. Indeed, organizational structure is often less important than how it is managed. Further, structure must be dynamic, continually adapting to changing conditions. Qualified by each of these considerations, we believe the organization portrayed in Figure 3 will go far to enhance the law enforcement function of the NWRS.

Overview. The proposed organization raises law enforcement to the branch level. The Refuge Law Enforcement Branch would consist of three offices:

- ❑ Operations
- ❑ Administration and Support
- ❑ Professional Responsibility.

A Chief, who would report directly to the Chief, Division of Refuges, would head the proposed branch.

Office of the Branch Chief. Within the framework of guidance, direction, and limitations from the Chief of the NWRS, the Branch Chief would have full authority to and be accountable for setting broad law enforcement goals and objectives, designing strategies to achieve objectives, establishing and maintaining policy, and all other essential CEO functions. It is presumed that all duties will be conducted with maximum collaboration of all other Branch Chiefs in the Refuge Division. The role will be conducted with full understanding that refuge leaders remain the principal source of refuge law enforcement authority and accountability, as is presently the case.

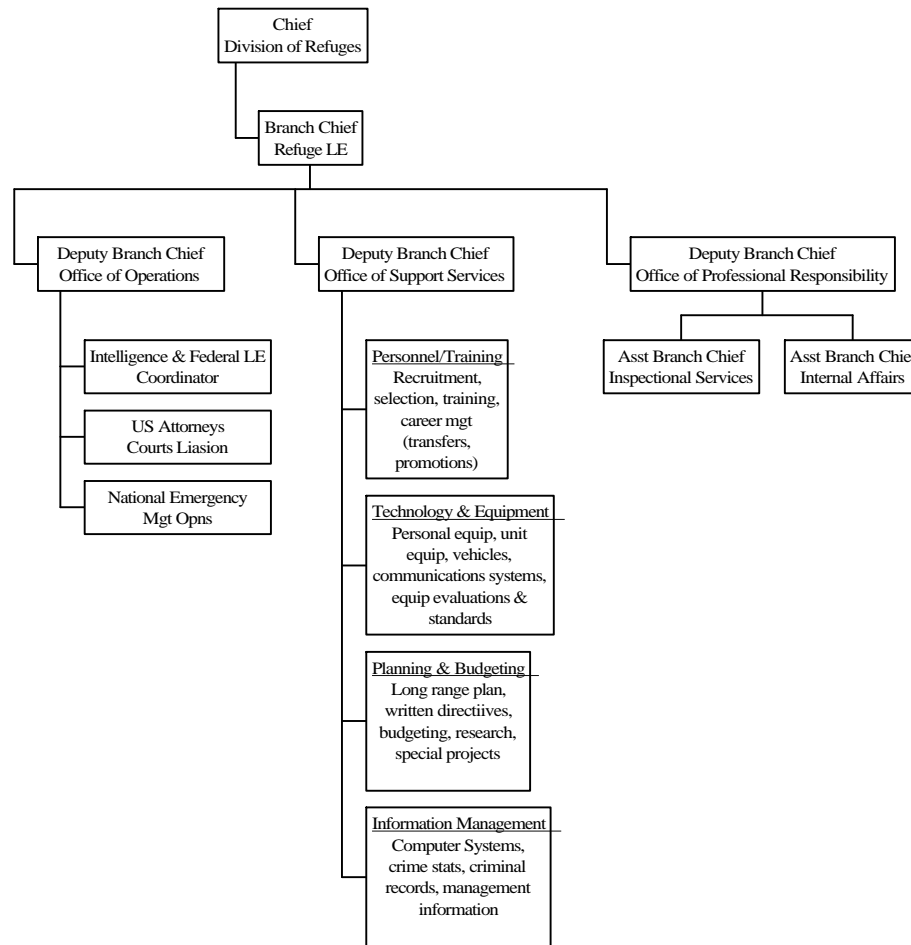
Office of Support Services. This office would house a number of the support services that are currently not provided or are under-resourced. Component units would include: Personnel and Training; Planning and Budgeting; Technology and Equipment; and Information Systems. Primary functions of these service units are itemized in Figure 3.

- **Personnel and Training.** Recruitment, selection, transfer, promotion and related personnel activities are fragmented. Coherent career development management and tracking does not appear to exist for FTLEOs or CDLEOs. Training is segmented, with an FT officer at FLETC overseeing entry-level training and, to some extent, specialized and in-service courses. Personnel who perform other law enforcement duties in Refuges and regions fill in with design and delivery of in-service training and firearms re-qualification. The result is less than consistent training for all law enforcement personnel and no follow-on training other than in-service for CD personnel. The recommended unit would assume responsibility for coordinating these functions to achieve national level policies and planning goals and objectives. There is, also, a lingering and unfulfilled need for a well-developed field training officer (FTO) program for new recruits. This office should develop and manage this program, in conjunction with the FT coordinator at FLETC.

- **Technology and Equipment.** This would establish equipment standards; procure and control equipment; coordinate radio communications system development; establish protocols for alternative communications system support options (use of state/local or other federal radio systems or equipment to ensure adequate 24/7 capability).

No central control of personal or unit law enforcement equipment seems to exist. Personal equipment is issued at graduation from the basic course at FLETC. Once a LEO leaves his first assignment location, consistent tracking of this equipment seems to break down. Unit equipment location and status is not tracked at the national level, possibly resulting in less than efficient utilization of equipment and increased costs. Site visits and interviews reveal an inconsistent allocation of required vehicles and specialized equipment. This is attributable to procurement at the refuge level without benefit of structured national standards or funding. Non-existent/ appropriate radio communications for law enforcement operations is self-evident upon observation at refuges and a source of complaints from LEOs. This includes FWS supported 24/7 radio capability, forcing refuge level LEOs to rely upon personal coordination and contact with state/local law enforcement agencies for support and radio frequency assignments. The establishment of this unit at the national level, with responsibility for the procurement, distribution and tracking (inventory) of logistics items, will greatly enhance the maximizing of available equipment resources.

Figure 3
Proposed Law Enforcement and Command Structure



Revised Dec 19, 2000

- **Planning and Budgeting.** This unit would be responsible for long-range/strategic planning; written directives consolidation and maintenance; operations technology research; and special projects.

A strategic/long-range law enforcement operations plan does not seem to exist. Despite NWRS requirements for annual updates to the refuge plans, few were found. Those that were discovered are outdated or can better be classified as an emergency response plans to critical incidents. They contain no goals, objectives, strategies, or evaluation components.

There is no long-range plan to monitor attainment of goals and objectives. Directives are not all consolidated and in some cases outdate and/or inconsistent with law enforcement needs. The budgeting system and subsequent distribution of funds is a matter of local control, by the refuge project leader. Law enforcement receives support when project leaders are so inclined. There is, however, a pattern of more adequate funding of law enforcement operations on refuges where FTLEOs are present. Little is done to associate law enforcement expenditures with established goals and objectives. Establishing an office to manage these functions at the national level will enhance and improve these critical systems, as well as provide a central point for establishing service wide specifications for a coherent and easily accessed written directive system geared to field use by LEOs, and most importantly, a long-range plan for delivery of law enforcement services over an extended period in the future.

- **Information Management.** This unit would create and manage a comprehensive law enforcement management information system to include crime and service analysis.

References to data gaps and data reliability in the preceding chapter demonstrate the poverty of current information capacity and practices. Law enforcement analysis, management, and evaluation are the victims of this condition. This more fundamental management flaw must be remedied quickly.

Crime analysis is non-existent at any level (strategic or operational). The reporting system is localized, not conducive to effective or frequent sourcing, or user-friendly. In fact, the current computerized reporting system is managed and designed on an ad-hoc basis by a FTLEO in a refuge in Mississippi. The system has been implemented in local mode only, on some refuges, despite being available to all refuges. It is used by LEOs on a local option basis.

Office of Professional Standards. To establish a professional law enforcement control capacity, two functions should be established, internal affairs and inspections.

- **Internal Affairs.** IA would investigate all Class I complaints against refuge law enforcement personnel; review all other investigations handled at the regional and refuge levels; develop investigative guidelines, consistent with DOI disciplinary policy and procedures; train regional and refuge personnel designated by policy to conduct IA investigations; provide guidance to the Branch Chief on disciplinary issues. The unit should coordinate with DOI OIG on issues of interest to that office and prepare or coordinate preparation of responses to congressional inquiries on IA issues. It should participate on service-directed shooting teams to evaluate use of deadly force.

- **Inspectional Services.** This unit would conduct scheduled and special inspections of refuge law enforcement units and sites; develop inspection guidelines; develop and deliver training to regional and refuge personnel in areas of interest and on conformance techniques; assist audit operating units for policy and directives compliance; assist in developing compliance, at all levels. It should review all operations for compliance with long and short-range plans and coordinate refuge law enforcement inspections program with those of the DOI/OIG and/or conduct them in conjunction with that office. Regional LE Coordinators will also be utilized to assist with this important function.

Office of Operations. Numerous instances were found where initiatives failed to be achieved due to the absence of some level of national coordination or management. These ranged from conflicts at the line level between federal agencies to lack of judicial follow-up and adjudication of refuge level problem areas to needed assistance in both personnel and equipment to handle large scale events at or near refuge areas. A review of the national structure failed to identify key organizational components that should be assigned these tasks.

Many of the identified functions/units would normally be found in a well-designed federal, state or local police agency. They contribute to efficient and effective operations, as well as command and control as needed. Given the decentralized model of the Service, the placement of these agencies in a non-command authority position will compliment local autonomy, where needed.

It is recommended that a Office of Operations, supervised by a Deputy Branch Chief, be established reporting to the Branch Chief, Refuge Law Enforcement. Within that office will be an Intelligence & Federal Law Enforcement Agency Coordinator, a US Attorney & Courts Liaison, and a National Emergency Management Operations Unit. The latter unit would have minimal full time staffing and be augmented with other personnel as determined by the crisis at hand.

- **Intelligence & Federal Law Enforcement Agency Coordinator:** This individual would be the link between all other federal law enforcement

agencies and would be the central feed point for law enforcement intelligence data collection. Additionally, he/she would participate at the federal and state level in cooperative intelligence organizations, coordinate development of memoranda of understanding between refuges and other law enforcement agencies (to include being the repository for the same), and provide information, guidance and intelligence down to the refuge as necessary. This would enhance the quality and effectiveness of the response to various potential situations at the refuge level.

- **U.S. Attorney & Courts Liaison:** This individual would address prosecutorial and adjudication issues regarding refuge enforcement and prosecution. It would be the coordinator's responsibility to monitor the effectiveness of the prosecution process (from a refuge officer standpoint) and make appropriate recommendations for changes to refuge policy or procedure. Additionally, any necessary MOUs and/or liaison with federal or state prosecutors and with appropriate courts, will fall within this unit's responsibility.

- **National Emergency Management Operations:** This unit would manage the Refuge Law Enforcement emergency operations center, which would have the capability to monitor, manage, and, if required, assume command, of large scale activities occurring on or near refuges. While the assumption of command would be an exception, the center would have the capability to real time monitor ground operations, re-direct resources, and make strategic decisions in response to changing actions on the ground.

Staffing. It is not practical to offer definitive judgements on staffing requirements for the proposed command and support structure. This must be governed by workload requirements, which will evolve over time. Initially, the NWRS should appoint:

- | | | |
|---|---------------------------------------|---|
| □ | Branch Chief | 1 |
| □ | Deputy Branch Chiefs | 2 |
| □ | Assistant Branch Chiefs | 2 |
| □ | Personnel and Training Officer | 1 |
| □ | Technology and Equipment Officer | 1 |
| □ | Planning and Budgeting Officer | 1 |
| □ | Information Management Officer | 1 |
| □ | Intelligence & Federal LE Coordinator | 1 |
| □ | US Attorney & Courts Coordinator | 1 |
| □ | Supervisor, Emergency Management | 1 |

Each of these specialists should inaugurate their service by inventorying needs, fashioning a development/strategic plan, assessing staff requirements, and developing appropriate policy and procedure directives.

RECOMMENDATIONS

To reposition the law enforcement function to contribute to the core mission of the NWRS, the following actions should be taken:

1. **Reorganize NWRS law enforcement function command and support services to conform to the structure outlined above.**
2. **Staff the new structure at a level commensurate with workload.**

SECTION 3: STAFFING

Proven methodologies are available to evaluate adequacy of existing field patrol staffing levels and to calculate requirements in "call-driven" police settings, principally urban and suburban settings. Proven methodologies are not available for land management settings. Accordingly we approach this issue with less precision than we would like.

The NWRS is functioning with 602 law enforcement officers, 62 full-time and 540 collaterals. The law enforcement commitment from this complement approximates that which would be received from 244 full-time officers. For reasons that follow, we believe an increase is justified.

Field interviews, field observations, document research, and study-specific data collections reveal a series of instructive staffing-relevant considerations:

- **Current Complement.** The 62 full-time LEOs are the law enforcement staffing baseline. They commit exclusively to law enforcement. Collaterals distribute their time among a range of competing and equally important activities. Whether unused/excess capacity exists among collaterals that could be committed to law enforcement is not known. Accordingly, whether the 244 officer-equivalent law enforcement commitment can be increased from within the current complement of 602 without damage to competing refuge activities and requirements is also not known.
- **Staffing Policies.** Law enforcement staffing policies and criteria do not exist. Unlike most police agencies, the System has not set minimum staffing standards, even ones as basic as 24-hour, seven days per week coverage.

- **Safety Standards.** The FWS/NWRS has not set law enforcement safety standards, most notably back-up and multiple officer response requirements.
- **Coverage Gaps.** Many refuges are uncovered by full-time or collateral law enforcement officers, during evening hours, on weekends and on some holidays due to scheduled days off, sick leave, and out-of-refuge professional activities.
- **Collaterals.** A number of collateral duty officers, unquantifiable, do not regard law enforcement as a primary duty, are not as motivated about this aspect of activity as some others, and do not exhibit the performance quality of full-time officers. Overall, collaterals are not the base upon which to build the law enforcement future.
- **Leveraging Capacity.** The combination of refuge dispersion and small staff complements at many refuges inhibits leveraging capacity and flexibility. Refuges have very limited ability to multiply staff for special events or to confront special problems without sacrificing essential refuge work of other kinds.
- **Staffing Trends.** The NWRS has not been able to supply reliable staffing trends data. One document (in our collection) places 1993 staffing at 625 collateral duty officers, 40 full-time officers and 30 seasonals, a total of 665 excluding the seasonals. It seems reasonable to conclude that staff has not increased in recent years.
- **Service Population.** In contrast to stable or declining staffing, visitation has increased, by 7.3 million since 1996.
- **Refuge Profile.** Also in contrast to stable or declining staffing, there has been marginal growth in number of refuges, 13 since 1995, and number of acres to be protected, almost one million since 1995.

EVALUATION

The foregoing configuration of staffing-relevant attributes justifies an increase in law enforcement staffing. Augmentation should concentrate on the addition of full-time law enforcement officers. The augmentation process should be paralleled by a concerted effort to establish a defensible law enforcement staffing allocation and deployment methodology, a comprehensive resource leveraging program, the search for innovations in organization, a concept introduced in the preceding chapter, and a focus on the supervision/mentoring/guidance issue, also introduced earlier.

An Augmentation Scheme. In absence of minimum staffing policies, a staffing methodology, and a staffing-tailored database, augmentation requirements cannot be quantified. An augmentation approach is available however, and recommended for use during the period that staffing policy, methodology, and database issues are addressed.

“Refuge Law Enforcement Operations Needs Database,” was issued in August, 1999. This document inventories, refuge-by-refuge, the law enforcement/security staffing equipment, technology, and facilities needs of the system. The package requests:

- ❑ 346 Projects
- ❑ 235 FTEs
- ❑ 9,750 Security Initiatives
- ❑ 55 Law Enforcement Vehicles
- ❑ 45 Law Enforcement Boats.

Cost impact is projected at \$43 million for projects. Cost impact for staff is not projected. At an average cost of \$60,000 per law enforcement officer, first/one year costs for staffing would be \$15,000,000 – a cost equal to total expenditures for law enforcement in 1999. Some of the 250 officers requested would be collaterals and, therefore, less than a full law enforcement expense. The plan projects that the package of initiatives would produce:

- ❑ 105,000 additional incidents documented (law enforcement actions regarding serious crime, other offenses, traffic incidents)
- ❑ 900,000 additional public contacts
- ❑ 8,500 additional case assists.

A sample of suggested initiatives is examined under Resource Leveraging.

Until a systematic, data-driven staffing allocation and deployment construct is available, and within/up to the limits of funding for additional staff that is authorized, the RLEO Needs Database can serve as a useful foundation for augmentation decisions. Appropriate executives, in concert with agency analysts, budget specialists, and law enforcement executives, should prioritize projects in the Database, and base augmentation decisions on these priorities.

Augmentation Criteria. Decision guidelines and criteria are required to employ the recommended process productively. The nature and magnitude of “payoffs” – projected outcomes, must receive greatest weight. Refuge managers have been required, quite prudently, to forecast payoffs. They have quantified expected/projected

increases in documented incidents, public contacts, and case assists. They have “promised” results qualitatively, most of these being prevention expectations. As a prerequisite to an affirmative augmentation decision by the NWRS, managers should be required to explain and justify their promises, both quantitative and qualitative, persuasively, and thereafter, be held accountable for delivering on their pledges.

Prior to this exercise and associated decisions, the NWRS must confront a series of unresolved law enforcement policy issues:

- ❑ Mix of prevention and control (arrest, citation, prosecution) activities
- ❑ Mix of visitor and resource protection emphasis
- ❑ Allocation of resources between high visitation and low visitation refuges
- ❑ Special needs/priority of rapidly changing urban refuges.

A policy decision should be made on allocation of new full-time versus collateral duty officers. Our position on this matter has already been expressed. These policy decisions (criteria) must frame the augmentation consideration and decision process.

A Staffing and Deployment Model. Work should begin immediately to develop a defensible law enforcement staffing allocation and deployment model. In view of the land management staffing state-of-the-art this will be a daunting and time consuming endeavor. The process must produce NWRS policy positions on minimum refuge staffing requirements.

For the Service this endeavor would reenergize an earlier effort. In 1993 the USFWS conducted an assessment to identify factors upon which to base assignment of law enforcement personnel. Whether officers should be full-time, seasonal, or collateral was a major concern. The assessment was designed to develop:

- ❑ Alternatives for conducting the refuge law enforcement program
- ❑ Criteria to evaluate law enforcement needs and effectiveness of individual officers
- ❑ Criteria to determine when full-time officers can and/or should be used in lieu of collateral duty officers.

Data collection focused on:

- ❑ Staff days associated with resource management, property protection and public use. These data were gathered by day, month, and year.

- ❑ Law enforcement activity including citations issued; written and verbal warnings; incidents reported with no arrest or citation; estimated number of additional warnings and incidents not documented; percentage of the year when a higher level of enforcement was needed; availability of other agencies to support operations.
- ❑ Refuge demographics including size (acreage); proximity to urban areas and other population centers; number and type of employees; visitation.

Using the three categories of data, refuge project leaders quantified law enforcement requirements. Statements were required to support requirements specifications. Regional Law Enforcement Coordinators, Associate Managers and Assistant Regional Directors for Refuges received, modified, and/or concurred with requirements statements.

NWRS history of use and value of this endeavor is unclear. It is reported that some refuges and regions used/use results for budgeting and others did not. Results were not used at FWS/NWRS headquarters for staffing planning and decisions. For current and practical purposes, it is safest to assume that this product has faded away. This notwithstanding, the experience is not totally without value for the future. The objectives of the assessment remain relevant. The database design, while rudimentary, was a good start and can be built upon. There is now, as a result of the effort, some institutional experience in allocation modeling.

Early in the recommended process, FWS/NWRS staff should examine models used by DOI and other land management agencies. The National Park Service has invested years in a system called V-RAP (Visitor Management Resource Protection Assessment Program). V-RAP is patterned upon the Natural Resource Management Assessment Program and Cultural Resource Management Assessment Program, a methodology used to staff resource and cultural operations. The programs, in turn, use FIREPRO as a methodological foundation. According to the NPS, FIREPRO is recognized as an interagency standard for developing, testing and justifying staffing and support needs.

It is quite possible that the services of NPS personnel who fostered and carried out the V-RAP process could be engaged to assist the NWRS.

Resource Leveraging. Service demands that exceed current capacity or will in the foreseeable future, can be met in several ways:

- ❑ Increase staff
- ❑ Introduce new and enhance use of current productivity strategies
- ❑ Combine the foregoing.

Reliance on staffing increases alone is not defensible.

While developing an augmentation scheme and augmentation criteria, and subsequently selecting projects (or portions of projects), NWRS decision makers should pursue productivity options. Productivity options minimize staff augmentation requirements and enhance the quantity or quality of service delivered by staff that is in place.

Significantly, the RLEO Needs Database is replete with projects founded that are anchored by productivity strategies: public/private cooperation habitat management agreements; fencing; boundary signs; communications systems; buoys; remote camera surveillance; ATVs; enhanced information documents for visitors; in-car communications; hand-radios; automatic gates; alarm systems; facilities security systems; and patrol roadways.

Additional resource leveraging/productivity options to consider are:

- **Workload Reduction and Restructuring.** The workforce survey asked managers and officers whether refuge officers perform any law enforcement or other activities that are of questionable value. The overwhelming response was “No!”

Pressed with increasing service requirements and finite resources – the current NWRS situation, local police agencies have found/invented numerous ways to reconfigure workload. Among the most popular: use of lower cost para-professionals; cadets; volunteers; community partnerships; alternatives to arrest; online booking and arrangement; court liaison programs; distance learning; in-field report and information preparation and retrieval; information driven deployment; Comp-stat programming; proactive and preventive substance abuse, family violence and truancy reductions; child advocacy centers; and repeat call reduction. This list, clearly partial in content, is offered to demonstrate the range of innovation that is possible. NWRS managers and rangers surely can conceptualize strategies to restructure workload in ways that will leverage whatever staff capacity is available at any given time.

Some examples of this at the refuge level include: increased use of the current volunteer staff to assist in crime prevention efforts, use of technology as opposed to human intervention to address static vulnerability (alarms, sensors), maximization of MOUs with supporting state and local law enforcement, programmed instruction and local training conducted by the Area Supervisor/Coordinators previously recommended, and closer attention to repeat offense indicators of a need for problem solving efforts at all levels. Other area include focus on user reporting of events through alternative means, better crime prevention analysis and increased attention to physical security surveys as a preventive measure.

- **Contracting.** Probably more as a supplement than an alternative, refuges that are in close or reasonable proximity to municipal and county law enforcement agencies should consider greater use of contracting and mutual aid agreements for patrol, investigations, and prisoner transportation, and special event coverage. Contract employment should not be disregarded for support activities. It is mystifying, for example, that policies and procedures have been in a codification process for a decade due, in large part, to the shortage of staff personnel. The information and technology explosion that now dominates the economy of the entire world has relied heavily on short-term contract employees.

Refuges could consider contracts with local law enforcement personnel for the peak visitor times, to include weekends and evenings. These contract individuals could focus on incidents and areas more similar to that they experience on their local positions, allowing the refuge officers to focus on the refuge resource specific violations. Another possibility might be the use of non-profit contract personnel to augment the volunteer staff in interpretive duties, thus increasing the available time for FT law enforcement staff to address law enforcement issues. Attention to use of contracts with other law enforcement agencies to improve communications capabilities.

- **Problem-Solving.** Problem-solving is revolutionizing the way local police approach work. Introduced as a feature of community policing to maximize resource/staffing productivity, this concept stresses identification of causes and more permanent solutions to repetitive problems (calls-for-service). Traditionally, police reacted to situations by sending officers to sources/scenes of calls – over and over again. Problem-solving reverses this approach through diagnosis and minimization of factors that cause problems.

NWRS situations that may be susceptible to problem-solving techniques include: repeat incident analysis, specific crime trends, community engagement operations, visitor safety after normal working hours, holiday coverage. Other areas include critical event management, resource allocation, and resource leveraging initiatives.

Transcending Tradition. The NWRS functions “refuge-by-refuge.” The RLEO Needs Database provides the clearest evidence. It builds law enforcement needs refuge-by-refuge. Identifying needs in this manner is counter-productive to organization and staffing innovations. When addressing augmentation issues, we urge NWRS decision makers to explore new forms of organization and resource allocation – to be used not as the alternative but in conjunction with the current model.

Possibilities to consider are:

- ❑ Groupings of officers who serve in multiple settings (refuges), for varying lengths of time, to satisfy short-term, or special needs. These cadres could serve out of and be dispatched by regions
- ❑ Cadres of full-time officers, permanently assigned, who serve clusters of refuges
- ❑ Contracting options
- ❑ Consolidated or joint DOI land management policing operations.

The current refuge-by-refuge model has no leveraging potential.

Guidance and Mentoring. Our chapter on organization cited inadequacies in guidance, supervision, and mentoring. The augmentation process should focus on supervision requirements and strategies as well as officer staffing requirements. While refuge managers must retain final accountability for refuge law enforcement operations and must be the primary commander and supervisor, officers could benefit from the following initiatives:

- ❑ On-site auditing and mentoring by regional law enforcement specialists. This would require increases in regional law enforcement staffing.
- ❑ Direct assistance to the refuge project leader in the preparation and monitoring of annual plans, review of refuge officer productivity, assistance in budget preparation and consultation on major event strategies.

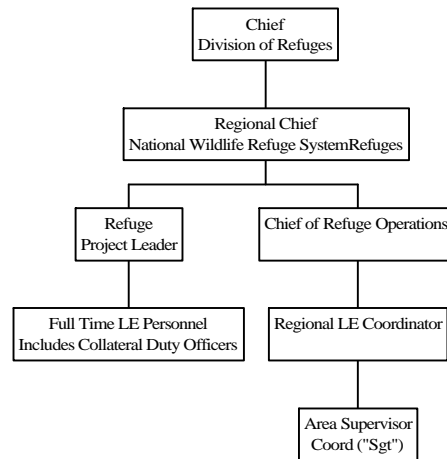
Staff support officers called Area Supervisor/Coordinator (or some other title) should be added in numbers that allow a minimum of two visits to every refuge each year (two-three day visits). These “supervisors” could be allocated by state, series of complexes, or series of refuges. They would physically ride with refuge officers in their daily duties, review their work products and mentor/counsel them on such, evaluate problems areas and participate, with officers and managers, in problem solving activities. They would assist management in the development of annual law enforcement plans, ensuring clear goal and objective statement, assist in monitoring the progress towards these goals, and other activities commensurate with law enforcement first line supervisory activities. Figure 4 reflects this proposal.

RECOMMENDATIONS

To upgrade the capacity of the law enforcement function to contribute to the core mission of the NWRS, the following actions should be taken:

- 1. Increase the current complement of 602 law enforcement officers.**

Figure 3
Proposed Regional Law Enforcement and Command Structure



Area Supervisor mentors FT LE personnel, rides with them, reviews reports citations, counsels. In addition he mentors project leaders on annual LE plan development, observed LE problems, reports on FT/LE officer productivity, and discusses LE personnel training needs. May be assigned by state or series of complexes or refuges.

- 2. Prioritize addition of full-time law enforcement officers.**
- 3. Develop a defensible law enforcement staffing allocation and deployment model.**
- 4. Accompany augmentation with introduction of new and enhancement of current productivity and resource leveraging strategies.**
- 5. Depart from exclusive reliance on the traditional refuge-by-refuge organizing and staffing scheme in favor of alternative and innovative approaches.**
- 6. Fill supervision, guidance, and mentoring gaps with region-delivered refuge officer support programs.**

SECTION 4: MISSION, GOALS AND OBJECTIVES

Several versions of FWS/NWRS mission and goal statements, one set of law enforcement objectives, and a framework/structure/ development document have been assembled. Other versions may exist.

The Presidential Executive Order that establishes the FWS sets forth the mission of the NWRS. The mission is repeated, with minor modification, in the National Wildlife Refuge System Improvement Act of 1997. The mission appears in the U.S. FWS Service Manual with yet another variation. All versions emphasize the fish, wildlife and plant conservation intent of the Service.

Chapter 1, of the FWS Service Manual, the “National Wildlife Refuge System: Mission, goals, and Purposes,” 601 FW1, is the most comprehensive version. It states the mission of the National Refuge System, how it relates to the mission of the Fish and Wildlife Service, and explains the relationship of System mission and goals and the purpose(s) of each unit within the System. The chapter “. . . also provides guidance on the use of goals and purposes in the administration and management of the System.” Chapter I states that “The administration, management, and growth of the system are to be guided by the following goals:”

- Preserve, restore, and enhance all species of fish, wildlife, and plants that are endangered or threatened with becoming endangered.
- Perpetuate migratory bird, interjurisdictional fish, and marine mammal populations.
- Preserve a natural diversity of fish, wildlife, and plants.
- Preserve and restore representative ecosystems of the United States, including the natural processes characteristic of those ecosystems.

- ❑ Foster the understanding and instill appreciation of fish, wildlife, and plants, and their conservation, by providing the public with safe, high-quality, and compatible wildlife-dependent public use. Such use includes hunting, fishing, wildlife observation and photography, and environmental education and interpretation.

These goals are to be used to develop goals and objectives at the System, regional, ecosystem and unit level.

The Refuge Manual, a law enforcement directives document, portions of which have been, or are to be, incorporated into the Service Manual, outlines law enforcement objectives:

- ❑ **Policy**. The Service will enforce all laws and regulations under its jurisdiction.
- ❑ **Objectives**. The objectives of refuge law enforcement are:
 - To enhance the management and protection of fish and wildlife resources on refuge.
 - To ensure legal and equitable utilization of fish and wildlife resources on refuges, as prescribed by law.
 - To obtain compliance with laws and regulations necessary for proper administration, management and protection of the National Wildlife Refuge System.
 - To protect refuge visitors and their possessions from disturbance or harm by other visitors or themselves.
 - To assist visitors in understanding refuge laws and regulations and the reasons for them.

The Refuge Manual also frames the philosophy of the NWRS toward refuge law enforcement noting prominently that:

- ❑ It is the intent of the Service that refuge law enforcement be conducted in a mature, businesslike, and professional manner. There is no place in refuge law enforcement for individuals who become so obsessed with law enforcement authority that they neglect other responsibilities. Similarly, there is no place in any law enforcement program for individuals who refuse to accept their law enforcement responsibilities. The presence of either attitude among refuge officers places responsibility on their supervisors to take definitive and purposeful action to: (1) redress the

situation through performance/disciplinary procedures, (2) request withdrawal of the law enforcement authority, or (3) if the position occupied by these individuals requires law enforcement authority, secure reassignment of these individuals to other positions in the Service where law enforcement authority is not required. This area of supervisory responsibility cannot be ignored by supervisors. It must be pursued vigorously. (From Responsibilities)

- Refuge personnel have exercised law enforcement authority on national wildlife refuges for many years. Generally, this activity is accomplished in conjunction with other refuge management and maintenance functions. Refuge law enforcement is a management tool. Law enforcement authority, in most cases, is a collateral duty for refuge personnel having other duties and responsibilities. Some refuges having continuous and intense law enforcement demands will utilize a full-time refuge officer position or seasonal/temporary law enforcement positions. Whether it exists as a collateral or full-time duty, law enforcement is one of the most fundamental and sensitive areas of official refuge activity. It is fundamental because it ensures the protection of the refuge, its resources, and its visitors. It is sensitive because it carries with it the authorities and the responsibilities to deny citizens their freedom of movement and possessions. Refuge officers can, with just cause, detain citizens for questioning, place them under arrest, incarcerate them in detention facilities, and bring charges against them which can lead to the payment of fines or the serving of jail sentences. No other refuge activity impacts the individual citizen in such an intimate and profound fashion. It is imperative that refuge law enforcement always be carried out in a professional manner. (From Relationship of Law Enforcement to Other Refuge Activities.)
- Apprehension of violators by itself cannot be wholly effective in gaining compliance with refuge rules and regulations or in protecting the resources, property, and visitors within the refuge system. An active and purposeful preventive law enforcement program is also necessary. Preventive law enforcement primarily involves informing visitors and potential visitors about the laws and regulations governing public conduct on refuges. (From Preventive Law Enforcement.)

A March 1982 "RELEASE," 2 RM 1, titled "Objectives of the National Wildlife Refuge System," a component of the Refuge Manual, sets forth a framework of goals and objectives (and the goals now/still contained in the Service Manual).

- **Policy.** It is the policy of the Service to use the goals of the National Wildlife Refuge System (NWRS) as a guide for developing in the master planning process. All field station objectives will support the NWRS goals.

- ❑ **Service Objectives.** These are quantified and non-quantified levels of production for the various Service program areas. They are presented in program management documents and represent the long range goals of the Service in each program category.
- ❑ **NWRS Goals.** These are general statements which encompass certain output categories to be produced by the NWRS. They reflect those portions of the Service objectives presented in the program management documents that are considered the NWRS' contribution to these objectives.
- ❑ **Individual Field Station Objectives.** These are quantified statements which specify the level of each output to be produced on the field station. They are derived from the goals of the NWRS and represent that field station's contribution to achieving those goals.

EVALUATION

Every law enforcement officer, full-time or collateral, should function with the guidance, direction, and benefits of well-articulated, and, measurable set of objectives – law enforcement outcomes he or she is accountable for achieving. These should “tier down” from refuge objectives which in turn should tier from regional and Service's objectives. The FWS, NWRS, individual refuges, and law enforcement officers are not even remotely positioned to satisfy these standards. From top to bottom, from the Service level to the refuge officer, measurable objectives are absent. Lacking these, the management function is impaired in a variety of ways, direction and guidance, planning and evaluation being most crucial.

The law enforcement objectives that do exist, issued in 1982, may or may not be currently sanctioned. The Manual in which they appear is being retired. It is not clear which directives are in force and which are not, a condition which is irrelevant in the current instance, however. The objectives are useful as starting points for an outcome-specific objectives structure, but no more. In their present form they are not technically adequate, being insufficiently detailed to direct programming, behavior and for measurement and evaluation.

The NWRS will reap immense managerial and operational benefits from a professionally sound objectives and measurement system. Such a system will synthesize and enlighten resource allocation, program selection, evaluation, and accountability. To bring a meaningful system on-line will be a long-term endeavor, several years to structure, test, and refine the system itself, and several more to bring it to routine and satisfactory operating status. A cadre of technical/management specialists is needed to develop or manage development of the system. The Service may want to contract development to appropriate external experts from the private or public sector or the federal government.

RECOMMENDATIONS

To strengthen FWS, NWRS, refuge, and especially RLEO management, operations, and accountability, the following actions should be taken:

1. Create tiered structures of law enforcement goals and objectives.

Compatible integrated structures must exist at the national level, in regions, and, in every refuge. Objectives must specify the outcomes to be achieved. All objectives must be measurable.

2. Ensure that objectives are set collaboratively by officers and managers.

3. Ensure that the objectives are sanctioned by appropriate FWS and NWRS 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 NWRS.

A monthly/quarterly progress reporting system is advisable.

7. Ensure that law enforcement objectives are reflected in Refuge plans.

8. Accountability for achieving objectives should be one component of a restored operations evaluation (Professional Standards) process.

SECTION 5: POLICIES AND PROCEDURES

In Director's Order No. 42, in 1992, initiated reorganization and codification of the many policies and procedures manuals and handbooks in effect at that time. These included, but were not limited to, 14 publications. Today, the law enforcement function of the Fish and Wildlife Service is governed by three levels of policies and procedures:

- U.S. Department of Interior's Law Enforcement Handbook (446 DM)
- U.S. Fish and Wildlife Service Manual, including amended Director's Orders
- Individual policies, directives and memoranda issued by FWS regional directors.

Law Enforcement Handbook, U.S. Department of the Interior. This publication, September 21, 1993, contains directives on:

- Policy and Responsibilities
- Personnel Qualifications and Standards
- Policy Compliance Evaluation
- Emergency Assistance
- Victim and Witness Assistance
- Operation of Detention Facilities
- Evidence Handling and Storage
- Interception of Verbal Communications
- Case Management Standards
- Firearms and Other Defensive Equipment
- Carrying Firearms on Airlines
- Equipment and Vehicles
- Statistical Information Systems
- Records Systems
- Communications Systems
- Reporting Serious Incidents
- Emergency Response and Pursuit Driving
- Use of Force.

The directives and standards in 446 implement federal law enforcement statutory provisions, public law and regulations. Supplemental policies and instructions have been issued in the Law Enforcement Handbook. Every law enforcement entity within the DOI must comply with 446 DM policy directions and requirements.

U.S. Fish and Wildlife Service Manual. This publication hosts the policies and procedures of the Service. It is the result of the previously cited intent to merge series of published manuals and service protocols. There are 35 policies in this document that relate generally or specifically to the FWS law enforcement function. Nineteen of these that are most germane to law enforcement operations are organized in Part 400 of the Manual. The remainder are distributed throughout other parts. The 35 policy areas are:

- History of the Refuge System
- History of the Office of Law Enforcement
- Law Enforcement Authority
- Uniforms

- Authority – Statutes and Treaties
- Authority – Historical Basis
- Law Enforcement Training
- Wildlife Handling and Inspections (Safety)
- Report of Survey – Theft or Vandalism Reporting
- Disposal of Firearms
- Official Use of U.S. Government Vehicles
- Personnel Security – Policy and Responsibilities
- Position Risk and Sensitivity Designations
- Public Trust and National Security Investigations
- Adjudication, Clearance, and Documentation
- Rules of Conduct – Code of Conduct
- Rules of Conduct – Investigative Affairs
- Rules of Conduct – Hunting and Fishing Activities
- Rules of Conduct – Investigations of Employee Misconduct
- Use of Force Policy
- Reporting and Board Review
- General Guidance
- News Media
- Compulsory Process and Testimony
- Office of Law Enforcement – Priorities
- Coordination and Cooperation
- Contaminant Investigations
- Availability of Agents
- Firearms
- Settlement Monies from Criminal Cases
- Cultural Resources Management
- Wildlife Trespass
- Serious Incidents – Policy and Procedures
- Safety – Report of Accident/Incident
- Safety – Serious Accident Investigation.

The Service Manual includes five Director's Orders that bear on law enforcement:

- Refuge Manual
- Redlegation of Authority – Removal of Official Government Identification and Markings on Administrative Vehicles
- Use of Child Safety Locking (Gun Lock) Devices, August 18, 1998
- Health and Fitness Program (Wellness Program) for Law Enforcement Officers, May 5, 1998
- Professional Liability Insurance.

A number of policies from the earlier Refuge Manual not yet been incorporated into the Service Manual remain in force:

- ❑ Responsibilities
- ❑ Relationship of Law Enforcement to Other Refuge Activities
- ❑ In-Service Training Requirements
- ❑ Other Equipment
- ❑ Appropriate Response
- ❑ Cooperation with Federal Agents
- ❑ Cooperation with Other Organizations
- ❑ Case Management
- ❑ Planning
- ❑ Undercover Operations.

Regional Policies. FWS regions have developed policies to meet selective purposes and needs. We reviewed policies from Regions 1, 2, 4, 5, and 6. Many regional policies do not deal with law enforcement issues. Several regions address law enforcement topics.

- ❑ **Region 1**
 - Emergency Vehicle Response Actions
 - Firearms Qualification/Remediation for Refuge Officers
 - Non-law Enforcement Use of Firearms
 - Firearms Safety Courses for Non-Law Enforcement Personnel
 - Emergency Vehicle Response Actions
- ❑ **Region 2**
 - Firearms Remediation Policy
 - Solicitor's Opinion – Law Enforcement Authority Relating to Enforcement of State Game Laws by Deputized Fish and Wildlife Service Special Agents and Refuge Officers
- ❑ **Region 4**
 - Policy on Obtaining State Law Enforcement Authority
 - Policy Guidance for Coordination Between Refuge Officers and Special Agents in Region 4
 - Request for Refuge Law Enforcement Assistance
 - Firearms Qualification and 40-Hour In-Service Law Enforcement Training
 - Code of Conduct

- Drug Incident Reporting
 - Canine Use Policy
 - Vehicular Pursuit and Emergency Response
- **Region 5**
- Firearms Qualification for Refuge Officers
 - Refuge Officer Law Enforcement Commission
- **Region 6**

This region has developed a single Regional Law Enforcement Policy document that covers a substantial number of individual policies on subjects such as law enforcement authority on refuge property and in surrounding state jurisdictions; providing emergency assistance; firearms qualification and force options.

EVALUATION

The NWRS is completely aware that substantial work is required to codify, streamline, and render more user-friendly, the overwhelming volume of directives currently in force. Recognizing the problem does not justify, however, allowing the revision process to languish, as is the case, to accord low priority to the effort, as seems to be the case, or to commit only marginal resources to the task, as is the case. Technically, we find a series of inadequacies ranging from policy gaps to redundancies, and from construction to language shortfalls. On the positive side, a satisfactory and workable organizing structure and policy format has been developed/selected. Overall, however, the policy and procedure condition of the NWRS fails to comply with professional expectations.

Policy Organization and Integration. Existence of three sources of policy is inherently confusing and cumbersome. It promotes risk of duplication, inconsistency and contradiction. Among the three sources of policy there are numerous statements that deal with the same or similar subjects. A line-by-line comparison of every same or similar policy promulgated by DOI, FWS and FWS Regional Offices was beyond the scope of this study. This level of scrutiny was not necessary, however, to find that numerous contradictions, inconsistencies and related problems exist.

The subject of firearms qualifications is a case in point. The DOI Handbook clearly states that in semi-annual firearms re-qualification, law enforcement officers must attain a score of 70 percent or more with each firearm they are authorized to carry (446 DM, 10.7.B). The FWS Service Manual requires a higher score of 80 (Sec. 445 FW 4.8A), while Region 6 still carries in force a minimal requirement of 70 to pass (Refuge Memorandum No. 8). The Region 6 policy would have been replaced with the 445 FW4 policy. Regional policy can be more restrictive but not more liberal.

One could laud FWS for setting a higher, more professional standard for firearms qualification than the baseline set by DOI. But this also makes it difficult to ascertain whether a region is in violation of the FWS standard if it is still in compliance with the DOI standard. From a general policy standpoint, it would be assumed that the FWS standard(s) in this and other regards would be the ruling authority as long as FWS policies do not create a reduced or lower level of performance expectation from officers than is required by DOI standards. However, this point is not clear in practice.

The Region 6 memorandum on firearm qualification is dated April 2, 1986. This raises the additional issue of whether this directive is still in force. This is a problem common to all regions that provided policies and related documentation. Effective dates of these documents range from 1983 to 2000. Rarely is it clear whether they replace previous directives or whether they remain in force. Policies, in whatever form they appear, should be reviewed at least once a year and officers provided with revised versions or notified that the policy remains in force without change. No policy should remain on the books and appear to be active after 17 years, without re-evaluation and reissue.

Policy discrepancies also exist among regions. In the case of firearms policy, once again, a case in point is the manner in which regions deal with officers who fail to qualify with the primary service weapon. The DOI Manual indicates only that officers who fail to qualify may not perform any law enforcement duties that may require the carrying of a firearm. Policy for handling remedial training and the steps that an officer must take to regain use of his or her firearm and law enforcement certification are not discussed by DOI, nor is this issue explicated in the FWS Service Manual. Without guidance in this matter from higher authorities, some regional offices have apparently taken the initiative to establish their own procedures. But here, as before, procedures are not consistent among regions.

For example, some regions specify the number of times an officer may attempt to re-qualify within a given time frame. Others do not reference this issue. Some regions, but not others, specify a remedial course of instruction for officers who fail to qualify, even if nature and duration are not uniform among regions. Some regions provide no limitation on the length of time required to re-qualify and most do not indicate the scope of or limitations on officer' assignments while re-qualification is pending. These are serious policy shortcomings, particularly in the crucial policy area of firearms use and training.

Re-qualification is only one area of extreme policy diversity among regions. Region 1, for example, provides direction on securing weapons and the use of trigger locks for weapons and the use of trigger locks for weapons. Region 6 recommends the use of stress/judgement courses as part of its firearms training in addition to the Service requirement of reduced light firing. With respect to less lethal weapons, there appears to be serious lack of policy guidance. Directives on the appropriate use of batons and pepper spray could not be identified other than on a very limited basis in the FWS Manual and in several regional policy statements or memoranda.

These issues are brought forth not solely to critique firearms policies, even though there are numerous modifications that need to be made. Nor is this discussion meant to suggest that policy uniformity is a goal to be achieved for its own sake. These comments are intended to point out that there is a lack of central control, guidance and decision making with respect to policies and procedures of the Fish and Wildlife Service. A lack of centralized control has implications for officers in regions around the country far beyond the single issue of firearms policy.

Whether 40 hours or 4 hours of annual in-service firearms training is warranted should not be a matter of preference at the regional level. The amount and nature of firearms training in FWS law enforcement either is or is not an objectively reasonable professional service requirement (which we believe it to be). But this, and other operational requirements, must be based not only on professionally accepted law enforcement standards but objective assessments of officer needs in relationship to the tasks, responsibilities and assignments that refuge law enforcement officers perform. It would be reasonable under the current conditions for FWS to determine whether there is justification for more firearms training in one region than another or whether one region is devoting an unreasonable amount of time to this function. At present, FWS does not appear to have a system in place to conduct evaluations of this type and to draw conclusions upon which policy positions can be established for the FWS law enforcement function as a whole.

The same conclusion holds true for policies and procedures that may be deemed necessary by a regional office but which are not addressed at the national level. A good example of this is the Region 6 Memorandum, "Scope of Employment Status of Fish and Wildlife Service Refuge Enforcement Officers Assisting State Police, Game Wardens, or Local Law Enforcement Officers in Emergency Situations." This item was prepared by the Office of the Solicitor, Rocky Mountain Region. The document discusses an issue of great significance to refuge law enforcement officers and provides guidance to officers who may be called upon to provide affirmative action in support of state and local law enforcement officers in jurisdictions adjoining refuge property. The document makes it clear that refuge officers need to seek state enforcement certification and/or be deputized in order to take such actions. It also identifies steps that must be taken to help avoid civil litigation charges against refuge officers under these circumstances. This is an issue that has bearing on officers in all regions, yet it is addressed in only two regions and not at all in the Service Manual.

In cases there may be bona fide reasons to establish unique requirements to meet significant differences between/among regions. This should only occur with the knowledge and approval of an appropriate authority at the national level at FWS. In this and in other law enforcement policy matters, FWS must take the initiative to make decisions about the nature, scope and content of policies that are in the best interest of the Service, law enforcement officers and the public. This is not to say that regional offices should become mere recipients of policy edits formed at the national level. Quite the contrary. Regional officers must have a collaborative role in policy assessment, revision and development. Not only is such assistance needed at the national level of FWS, but involving regional personnel enhances acceptance of the changes which

policy restructuring necessarily requires. There is a wealth of knowledge and insight at the regional level that deserves to be brought into the policy process and can best be tapped through an organized and centrally controlled function at the national level. Efforts to organize and compile law enforcement policies into a single source through the Service Manual is a good initial step in the policy evaluation and revision process. While elimination of the Refuge Manual for law enforcement is not yet complete nor fully incorporated into the Service Manual, the concept of a centralized repository for national-scope policy is a sound approach and provides a basis for more effective centralized management of the policy function. Evaluation and refinement of the Service Manual is a gargantuan task under present circumstances at FWS headquarters. No personnel are designated solely for this function. There does not appear to be a clear mandate, plan or apparent sense of urgency attached to a comprehensive assessment and revision of FWS policies. Such an undertaking is clearly needed but is not possible without sufficient manpower, prioritization of the issue and establishment of a time-phased implementation plan.

Policy Gaps. In addition to issues of duplication, overlap, contradiction and confusion stemming from many existing policies at various levels, the NWRS lacks the range of policies necessary to direct and guide the law enforcement function. For example, officers are issued soft body armor, yet there is not identifiable policy that specifies whether body armor use is mandatory or a matter of officer discretion. Nor is there any formal guidance on body armor use, selection, care and maintenance, testing or proper disposal. Officers are called upon the stop motor vehicles on refuge land and on occasion to conduct vehicle searches. Yet there are no identifiable policies and procedures to govern/direct safe motor vehicle stops, to cover the law regarding the motor vehicle exception to the warrant requirement or processes for conducting effective and legal motor vehicle searches. At the same time, the Service Manual's law enforcement section deals with objectively less significant topics such as Official Use of U.S. Government Vehicles and has a policy on General Guidance. It is not enough to presume that officers know the rules on these matters from verbal instruction, training or local custom or practice. It is critically important that they be reduced to official FWS statements of policy and procedure.

To accurately define the complete range of policies that should be incorporated into the Service Manual, or other FWS policy documents, a comprehensive understanding of the scope and importance of individual tasks performed by refuge officers must be acquired. But even without such a study, subjects certain to be valuable additions to FWS protocols on a national scale can be recommended. These include, but are not limited to, without consideration to order of importance:

- Body Armor
- Vehicle Searches
- Conducting Motor Vehicle Stops
- Conducting Motor Vehicle Searches
- Motor Vehicle Impoundment
- Motor Vehicle Inventories

- Mobile Video Recording Equipment
- Searching for Missing Persons
- Investigation of Employee Misconduct
- Conducting Interrogations and Taking Confessions
- HIV/AIDS and HBV Protection and Prevention
- Emergency First Aid
- Grievance Procedures
- Dealing with the Mentally Ill
- Confidential Informants
- Court Appearances
- Field Interviews and Pat-Down Searches
- Harassment and Discrimination in the Workplace
- Employee Drug Testing
- Mutual Assistance – Memoranda of Understanding
- Obtaining a Search or Arrest Warrant
- Off-Duty Powers of Arrest
- Pepper Aerosol Restraint Spray
- Transporting Prisoners
- Standards of Conduct
- Citizen Contacts
- Multi-Agency Investigations.

These are among policies and procedures that should be added to the FWS Service Manual or should be significantly upgraded from those now available. Additional suggestions for policy additions include administrative issues that should be shared with officers as a matter of record. For example, officers should have a firm understanding of matters related to overtime pay, provisions for temporary light duty, the nature of and the agency's stand on sexual and other forms of harassment in the workplace, and any Service restrictions on secondary employment.

Most officers do not express concern or indicate notable dissatisfaction with established policies and procedures. This is a curious but not totally unexplainable or unusual finding. Most law enforcement personnel have an aversion to formal written policies and procedures. The fact that FWS has limited policy and allows much officer discretion is one possible explanation for this condition. Another possible explanation is that many officers have no standard upon which to compare their policies and procedures. Whatever the case, this finding has implications for expanding and updating agency policy. Expansion and resulting increase in accountability that follows from policy upgrades may meet with some initial displeasure or resistance. This possibility provides additional support for the notion discussed elsewhere in this chapter that regional offices need to be included into a comprehensive review and upgrade of the FWS policies and procedures. This includes the matter of additional policy needs that is the subject of this section.

Policy Revisions. The Service Manual is characterized by a workable format and organizational structure. FWS is presently incorporating and revising policies that are part of the older Refuge Manual. This review should include individuals who understand the impact of word usage and phraseology from both field operations and legal perspectives. The wording of some present policies needs refinement. A number of other policies require additional information in order to be complete. One of the most important of all law enforcement policies – use of force – typifies the issue.

The FWS Use of Force Policy (442 FW 1, March 29, 1996) contains examples of questionable word choices and commentary that could cause unnecessary confusion among officers and/or create an unnecessary legal burden for officers. In item 1.3 C of the Use of Force Policy, for example, deadly force is defined as: “Force that is intended or likely to cause death or serious bodily harm. Most often, deadly force involves the use of a firearm aimed at a suspect. Deadly force actually encompasses any means or instrumentality which may inflict death or serious bodily injury.” This statement is not totally correct.

In contrast to the above statement, “Deadly Force” should more properly be defined as any force that is reasonably likely to cause death. The issue of an officer’s “intention” is not relevant to this policy definition nor is the question of whether “serious bodily injury” may result instead of death.

Under the definition of “Force” the FWS Manual includes “physical presence,” “physical touching of another,” and the use of “restraints.” Professionally accepted definitions in this area would not include physical presence, touching or restraints such as the normal use of handcuffs.

Finally, the FWS policy statement on use of force states that “Service law enforcement officers will use only that force necessary and reasonable to overcome the resistance offered by a suspect or individual. The level of force used by a Service officer must not be excessive or unjustified. Here the legal standard for use of force is based on that which is objectively reasonable to the officer at the time of and in the context of the situation. Therefore, the seemingly inconsequential inclusion of the phrase “force necessary” imposes a standard greater than that required by law and could pose potential problems for officers in an adversarial environment. The legal standard for the use of force is based on that force which is objectively reasonable to use in the context of the circumstances and with the information available to the officer at the time force was employed.

To make the importance of this seemingly minor point clear, imagine an officer who reasonably believed at the time of a shooting that the subject had drawn and was pointing a firearm at him or her. Later it is discovered that the item drawn from the individual’s breast pocket under low light conditions and in an adversarial context was actually a tobacco pipe. Assume that the officer is charged with wrongful death. In a court of law, under cross examination, the officer would have to admit that he or she used force that was not necessary as stated in and required by agency policy. The officer could be placed in a vulnerable position under these conditions, not because he

or she did anything legally wrong but because the FWS policy imposes upon its officers a higher standard of care than that required by law. From this single example, the importance of word choices and phraseology in policy development should be clear.

From the standpoint of having completed policies, the FWS Use of Force policy can also be used as an example. It provides good information about when Oleoresin Capsicum (OC) may be used, but it fails to discuss a number of other important procedural matters concerning its use. These include how to deploy OC safely and effectively, limitation and restrictions on its use, the effects of OC on suspects and others, to include the potential need for medical care, reporting OC usage and issues regarding the maintenance and replacement of OC canisters. Arguably, some may choose not to include all of the foregoing points in agency policy. But, the information and direction that is included in the FWS Manual is incomplete by any objective standard.

Examples of additional policies that share the same problem are, but are not necessarily limited to, evidence control and the use of confidential funds.

Remedies. Based on assessment of FWS policies at present, we suggest that the agency take two immediate actions:

- Establish a collaborative study group, composed of representatives from all regions and appropriate operations of the Service, complete codification and upgrading of FWS policies and procedures.
- Establish effective centralized organizational control of the policy function at the national level of FWS.

An effort has been under way for a number of years to retire the law enforcement protocols published in the Refuge Manual and Law Enforcement Manual and to update them in the Service Manual. This is an extremely laborious undertaking, particularly in absence of apparent priority emphasis by the Service. Adequate staff, time and other resources are not being set aside for the task.

This condition may be due to a lack of conviction in the efficacy of the approach. "Fulfilling the Promise" (1998) recommends that "The Refuge Manual should be revived and serve as the principle source of land management policy for the Service. Like the Law Enforcement Manual, the Refuge Manual provides a distinct source of policy for many program-unique functions including . . . law enforcement." This recommendation is in direct opposition to Director's Order No. 42, cited at the beginning of this chapter, issued to initiate consolidation and more fully coordinate the many manuals in place at that time, including the Refuge Manual. This endeavor has been underway during the intervening years and there is no compelling argument to justify abandoning the effort.

It is clear that the policy revision process that has been underway is woefully inadequate. Rather than continue in the present manner, it would be more efficient and effective to tackle the policy issue comprehensively. To accomplish this, it is

recommended that an ad hoc committee be formed with the mandate of finalizing the law enforcement section of the Service Manual. This goal entails but should not be limited to collecting and collating all Service law enforcement policy from a national and regional level, determining where conflicts, duplications and related problems exist, making appropriate recommendations for changes to current policies where problems exist, and additional policies as need dictates.

The committee should have a clear mandate and time frame for completing the work and sufficient personnel and resources to make suggestions for policy revisions and additions that conform with requirements of DOI, professional accepted principles of policy formulation and contemporary law enforcement operations and standards.

It is also recommended that a separate field handbook be created as a reference document for law enforcement personnel. This pocket manual should include only those policies and procedures deemed critical for law enforcement operations, particularly those that provide direction for dealing with high-risk incidents and serious events that may require immediate action but that may be infrequently encountered.

Policy management is a dynamic, ongoing enterprise that requires full-time attention. To be effective and responsive, the function must gather critical information for assessment purposes and have the authority to deal directly with a variety of other Service functions that have access to essential information necessary for policy evaluation.

At present, information relevant to policy development, refinement, implementation and evaluation is spread throughout the Service, with limited means to collect or use it for policy purposes. A centralized authority is required to correct this inadequacy. The operation should focus on developing policy at the national level and link to sources of information that provide essential feedback for evaluation of agency policy and procedures. These sources include officer incident reports, accidents, crime data and related information that reveal the need to establish or modify policy. The proposed office of Support Services, Planning and Budgeting Section, is the recommended location.

Planning and Budgeting Staff should have direct ties to the recruit and in-service training function to ensure that training is consistent with established Service policy.

RECOMMENDATIONS

To strengthen the body of policies and procedures and NWRS direction and evaluation capacity, the following actions should be taken:

1. **Establish effective centralized organizational control of the policy function at the national level of FWS.**

2. **Establish a collaborative study group representing all regions and other appropriate operations of the Service to undertake a complete review of FWS policies and procedures.**
3. **Develop a field handbook/pocket manual that summarizes the most critical law enforcement policies.**

SECTION 6: HUMAN RESOURCES MANAGEMENT – RECRUITMENT AND SELECTION AND PROMOTION

The Refuge Law Enforcement Officer hiring process is decentralized, organizationally and geographically. Prior to a conditional selection decision by a hiring manager, the selection process is the responsibility of the federal Office of Personnel Management, but is typically delegated to regional personnel offices. Several steps take place after the conditional selection decision. These steps are the responsibility of the hiring manager. The regional law enforcement coordinator has staff responsibility to ensure that all necessary steps take place prior to a candidate attending formal law enforcement training.

PRE-SELECTION STEPS

The full-time Refuge Law Enforcement Officer job is typically assigned to one of two Occupational Series, the GS-0083-Police Series or the GS-0025-Park Ranger Series.

- **GS-0083-Police Series.** Primary duties of employees in this series are supervision of law enforcement work in the preservation of peace; prevention, detection and investigation of crimes; arrest or apprehension of violators; and provision of assistance to citizens in emergency situations, including protection of civil rights. The purpose of police work is to ensure compliance with Federal, State, county, and municipal laws and ordinances, and agency rules and regulations pertaining to law enforcement work.
- **GS-0025-Park Ranger Series.** Primary duties of employees in this series are to supervise, manage, and/or perform work in the conservation and use of Federal park resources. This involves functions such as park conservation; natural, historical, and cultural resource management; and development and operation of interpretive and recreational programs for the benefit of the visiting public. Duties characteristically include assignments such as: forest and structural fire control; protection of property from natural or visitor-related depredation; dissemination to visitors of general, historical, or scientific information; folk-art and craft demonstration; control of traffic and visitor use of facilities; enforcement of laws and regulations; investigation of violations, complaints, trespass/encroachment, and accidents; search and rescue missions; and

management activities related to resources such as wildlife, lakeshores, seashores, forests, historic buildings, battlefields, archeological properties, and recreation areas.

A vacancy announcement is created which specifies the position to be filled, incorporates information from a job analysis, and itemizes the minimum qualifications and the knowledge, skills, and abilities (KSAs) required to perform the job. The KSAs form the basis for evaluating qualifications of candidates. The vacancy is posted on the federal jobs website (<http://usajobs.opm.gov>). Supervisors sometimes recruit locally. A job remains posted for a minimum of two weeks.

The hiring process varies depending on whether an applicant comes from within the federal system or from outside the federal system. The hiring process is sometimes handled by the Office of Personnel Management (OPM) and sometimes delegated to the personnel function in the region – the Delegated Examining Unit (DEU). A drug test is required of all candidates.

External Candidates. When the application period closes, candidates are evaluated against the minimum standards for the job. Those candidates who remain in the pool (who meet minimum standards) are evaluated against KSAs through the use of a Crediting Plan – a benchmarked method for evaluating KSAs relevant to the job. Candidates receive a numeric score from this evaluation. In the DEU process, candidates complete a narrative description to highlight their KSAs. Evaluation and scoring may be conducted by subject matter experts, personnel technicians, or a combination of these evaluators. For the OPM process, candidates complete an electronic form, and an automated system scores their responses. Scores are adjusted to credit veterans status and make other required modifications. A certificate is provided to the hiring supervisor with the names of candidates in numerical order. Supervisors use discretion to select from among the top three candidates, but must abide by certain relevant rules. A veteran cannot be passed over for a non-veteran, for example.

Merit Promotion. When competing candidates are already in federal service, but at a lower GS level than the target job, they go through a competitive process that is similar but not identical to the process for external candidates. Federal service candidates are also rated against the Crediting Plan, but, upon judgement, fall into or do not fall into a “best-qualified” category. To determine a division between qualified and best-qualified candidates, the distribution of scores is examined for a natural break. The number of candidates required to provide the hiring manager a choice is also considered. Names of individuals in the best-qualified category are referred to the hiring supervisor in alphabetical order, without reference to relative numerical standing on KSA evaluations. If hiring supervisors choose to interview any candidate as a part of a merit process, all best-qualified candidates must be interviewed.

Non-Competitive Candidates. Certain former federal employees, federal employees at a higher GS level, and others, qualify for non-competitive status. Such

candidates are referred to the hiring supervisor as “best- qualified” without an evaluation of KSAs through the Crediting Plan.

POST-SELECTION STEPS

When hiring supervisors make selection decisions and necessary approvals are obtained, successful applicants are offered jobs, conditional upon successful completion of the following evaluations.

Background Investigation. OPM investigators conduct full background investigations for full-time and collateral refuge law enforcement officers. A limited background investigation is conducted for seasonal employees. In recently posted jobs, this step is described as occurring prior to the conditional appointment. The full background, following OPM guidelines, encompasses reference contacts, reference interviews, and records checks. The limited background entails, principally, records checks.

Domestic Violence Qualification Inquiry. Candidates for jobs that involve use of firearms are required to sign a statement regarding domestic violence. This inquiry asks if the candidate has been convicted of a domestic violence offense and requests more information if the answer is affirmative.

Medical Examination. Prior to a fitness examination, candidates undergo a medical examination and evaluation. Failure to meet physical standards is usually considered disqualifying, except when substantial evidence is presented that a candidate can effectively perform the essential functions of the job, with or without reasonable accommodation. The following medical qualifications are considered: eyes; ears; nose, mouth and throat; extremities and spine; heart and blood vessels; respiratory system; genito-urinary; nervous system; other defects that may adversely affect full performance of the job.

Physical Efficiency Battery. Following the Medical Examination, candidates are tested using the Physical Efficiency Battery (PEB) to ensure their ability to pass the PEB during their formal training. The PEB is the physical fitness and health battery that candidates must pass, later, during the basic training process. Five areas are measured by the battery: flexibility; cardiovascular endurance; body composition; strength; and speed and agility. The first four components influence an individual’s health and longevity. The fifth component, strength and agility, is measured by an agility run, and is included as a critical job skill not measured by the other physical tests. Age and sex standards are incorporated into the scoring system for all components, allowing participants to be evaluated with reference to their peers. The PEB administration during screening is for information and recommendations only. A candidate is not required to pass the exam at this time.

Psychological Examination. The psychological evaluation is newly implemented. The procedure involves tests, but no clinical interview, except by

telephone in exceptional cases. The evaluation consists of the Shipley Institute of Living Scale; Inwald Personality Inventory (IPI); Hilson Personnel Profile/Success Quotient (HPP/SQ); Hilson Safety/Security Risk Inventory (HSRI); Inwald Survey-5 (IS-5); Inwald Survey-2 (IS-2); Hilson Life Adjustment Profile (HLAP); and a social history questionnaire. Level of risk (low, mild, moderate, or high) is evaluated on seven factors: candor and honesty; ability to complete the academy and be trained; work ethic; social skills and social interest; hostility and anger control; antisocial attitudes and behaviors; acting out behavior and safety risk.

Questionnaire. The “Check List for Potential Refuge Officer Candidates” is designed to assist Regional Refuge Law Enforcement Coordinators to determine the suitability of candidates for the duties of Refuge Officer. The questionnaire consists of 15 inquiries. These include questions concerning an applicants’ motivation to become a refuge officer. Several questions describe aspects of the job that may create problems for some candidates, then ask for a candidate’s reaction. There is a law enforcement scenario question and a description of the requirements involved in basic training for refuge officers. This questionnaire is used at the discretion of the Regional Refuge Law Enforcement Coordinator.

Promotion. There is no established promotional career path for refuge law enforcement opportunities at the present time. Were there one, the promotional process would most likely resemble the hiring process for federal system candidates.

EVALUATION

The Refuge Law Enforcement Officers hiring process is characterized by a decentralized system and absence of a coordinating function to ensure that effective recruitment takes place or at proper steps in selection are followed. Recent efforts to improve the system are constructive. They also convey a recognition of a system that requires reconstruction in order to comply with professional standards. The process needs to be revised and placed in the hands of a single entity, responsible and accountable for its success.

Evaluation of candidates for law enforcement jobs should be greatly intensified prior to selection of finalists and conditional offers of employment. In the present system, the application of the Crediting Plan represents the only structured evaluation received by candidates during the pre-appointment stage. An improved process would base the selection of finalists on a broader base of information. In addition to the Crediting Plan, which, when implemented correctly, is a well-designed approach to structured evaluation of job relevant KSAs, candidates should be tested using a valid written commercial examination, predictive of success as a law enforcement officer. A carefully developed and standardized structured interview should complement information obtained from the Crediting Plan and the written examination. Ranking and selecting candidates based on this broader base of information would maximize the odds for selection of the best possible candidates. The other steps (medical, psychological,

background, and PEB) combined in a pass/fail basis, should remain at the post-conditional offer of employment stage.

Strengthening recruitment and the selection process is particularly important should the staff augmentation recommended in this report eventuate.

RECOMMENDATIONS

To strengthen the recruitment and selection, the following actions should be taken:

- 1. Create a nationwide central entity responsible and accountable for law enforcement recruitment and hiring in the entire Fish and Wildlife Service.**
- 2. Create a single entity within each region responsible and accountable for the recruitment and hiring process within the region specific to law enforcement.**
- 3. Establish a coordinated nationwide recruitment effort.**

This program could be expected to increase both the number of qualified applicants and the diversity in the applicant pool. Individual jobs are now posted only on the www.usajobs.opm.gov web site and local recruiting may or may not be undertaken by the hiring manager.

- 4. Conduct a comprehensive employment-focused job analysis for the Refuge Law Enforcement function. Use this analysis as a basis for a standard occupational classification, minimum requirements, recruitment, and selection system.**
- 5. Establish a standard occupational series for Refuge Law Enforcement Officers.**

Currently, the full-time job of Refuge Law Enforcement Officer is assigned to either the Police series or the Park Ranger Series, without apparent justification for the differential classification. The agency should arrive at and adhere to a standard, justifiable practice.

- 6. Employ a validated entry-level policing examination at the pre-approval stage.**
- 7. Standardize the use of Crediting Plans.**

If implemented as prescribed, Crediting Plans represent an effective screening technique, but, it appear, in practice, the effectiveness of implementation of the plans may be variable. The plans should be consistently developed and applied to extract information relevant to required knowledge, skills, and abilities.

Establishing accountability for the employment process (Recommendation 1) would provide a foundation for the standardization of Crediting Plans and of the remainder of the employment process.

8. Ensure that psychological examinations are interpreted by licensed psychologists and that a clinical interview is added to the process.

The current screening process is more accurately termed a suitability screening process, not a psychological evaluation. It is not consistent with the IACP Police Psychological Services Section's definition of a pre-employment psychological evaluation. In order to meet these guidelines, a licensed psychologist should interpret tests, and a clinical interview should be performed. The current vendor has a doctorate in social work.

To be effective, the process should also result in a definite recommendation that can meaningfully be incorporated into the selection process. The current process results in a profile across a series of dimensions, the interpretation of which could be problematic in individual cases.

9. Standardize the scoring of the "Check List for Potential Refuge Officer Candidates."

This instrument represents a step in the right direction for the right direction, but requires further refinement. A structured employment interview, with standard administration, and a carefully developed and consistently applied scoring strategy, would add greatly to the effectiveness of the employment process. Currently, the checklist is used at the discretion of the Law Enforcement Coordinator, and no standard scoring strategy is in place.

SECTION 7: TRAINING

As with any public police agency, the Fish and Wildlife Service has an obligation to ensure that its law enforcement officers receive the training required to perform duties effectively. To meet this mandate, the Refuge System provides comprehensive basic and annual in-service training, which includes semi-annual firearms qualification. Basic training is the responsibility of a training coordinator, housed at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia. In-service training is the responsibility of the regional law enforcement coordinators. There is no central planning for training, nor are training records maintained at a central location.

Goals and Objectives. The Refuge System does not have a statement of goals and objectives for law enforcement training, a training plan for the function, or for individual members. Part 231 FWI states as policy of the Service to develop its employees "through the establishment and operation of a progressive and efficient training program." Further, the Service "is committed to assisting employees in carrying out their responsibility for self-development by offering needed training."

Policies. Approximately 10 directives within the Service Manual deal with training. Further, portions of the old Refuge Manual, still in effect, have bearing. To begin, 232 FW2 establishes Service standards qualifications and procedures for law enforcement training. The order mandates that all permanent refuge officers complete the Land Management Training Program (LMTP) and the Refuge Officer Basic School (ROBS). Subsequent to this initial training, all officers must receive a minimum of 40 hours of in-service law enforcement training each year, which must include up to eight hours of firearms training. Field supervisors who do not carry a law enforcement commission must attend a 20-hour law enforcement training course, every three years. Seasonal law enforcement officers can receive a commission by attending a training course approved by the Assistant Director, Division of Law Enforcement, or attending an institution approved by the National Park Service. Every seasonal refuge officer must also receive a one-time, eight-hour law enforcement policy course provided at the regional level.

Firearms training is addressed in 445 FW4, Firearms. This order sets a minimum score of 80 percent on qualifications courses and mandates four hours of firearms training annually and requalification every six months. This training must include refresher training in weapons handling, tactics, and “other skills necessary to effectively use their issued weapons.” Firearms training is conducted by Service Designated Firearms Instructors (SDFI) who must have graduated from the basic Firearms Instructor Training Course at FLETC. This order also authorizes a wide array of service firearms (revolvers/semi-automatics, .357/.9mm/.40/.45 caliber, 2 $\frac{1}{4}$ inch barrels).

In-service training is addressed in the Refuge Manual, Section 14.10E, which states that In-Service training curricula will discuss:

- ❑ Policy – Department, Service and Refuge policy
- ❑ Case Reporting – Proper reporting procedures and how refuge cases are carried through the Law Enforcement Management Information System (LEMIS) and other databases
- ❑ Legal – Review of the laws of arrest and search and seizure
- ❑ Controlled Substances/High Profile Abuse – Identification, enforcement techniques and eradication
- ❑ Firearms – All areas relevant to the use of firearms
- ❑ Officer Safety – Could include defensive tactics, CPR, first aid and physical health
- ❑ Physical Efficiency Battery – Participation is required in multiple areas of physical efficiency.

Curricula for Regional in-service programs must be reviewed and approved by the Washington Office, Division of Refuges. Agendas are to be submitted 30 days prior to course date. According to the Refuge manual, responsibility for developing the curricula rests with the “Regional Refuges and Wildlife Office.” The Service Manual (232 FW2) places this responsibility on the Regional Refuge Law Enforcement Coordinator while the National Refuge Law Enforcement Coordinator is responsible for ensuring that the annual Regional refresher training meets Service standards.

Organization and Staffing. The Refuge System law enforcement training program is, in practice, not controlled by a central training unit, but by policy and procedure. Only two positions in the entire Refuge law enforcement program are dedicated to training, a Refuge Law Enforcement Coordinator and a Training Technician. Incumbents of these positions serve as on-site coordinators for basic and advanced training at FLETC.

The coordinator, a veteran refuge officer who has held this position for two years, holds a Bachelor of Science degree in Biology, is a FLETC-certified instructor and previously served as a “detailed instructor” at FLETC. He has received no formal training in the administration of training programs.

The Position Description for this position states that the incumbent will perform the following duties:

- Coordinate all aspects of Refuge Officer training at FLETC
- Interpret Refuge Officer training needs and directly assist regions with “in-service” training
- Develop policies regarding refuge officer training and development
- Provide recommendations to the Chief, Division of Refuges on all aspects of Refuge law enforcement
- Represent the Service at meetings and FLETC committees
- Review and inspect Regional and field operations to ensure compliance with national policy and directives.

The training technician is a former police officer. She has received no formal training in administering training programs. The position description for the training technician includes the following duties:

- Perform class coordination responsibilities
- Review existing operational procedures and recommend changes

- ❑ Assist as faculty advisor, including counseling students regarding discipline, dress, demeanor
- ❑ Provide liaison with FLETC
- ❑ Serve as primary focal point for filling slots in training
- ❑ Assists in the formulation of plans and activities
- ❑ Maintains a computer bank of exam questions
- ❑ Maintains procurement records.

The Division of Law Enforcement serves as the official FWS representative at FLETC. A Memorandum of Understanding between the Office of Law Enforcement and the NWRS clarifies the roles and responsibilities of each program. This system evolved during the 1990s when Refuges had no presence at FLETC and the Division of Law Enforcement coordinated refuge officer training. The Refuge System re-established a training office late in 1998. The Coordinator maintains a computerized database of refuge officers who have attended the LMTP (or its predecessor the 9PT course, which was replaced in 1993) and ROBS. The database goes back to 1983. Numerous names were selected at random from the database and the actual records requested. All records were produced, easily, and found to be in order. For records prior to 1983, a class number has to be provided.

Training Activity. During FY 2000, 208 officers were trained:

❑ Pre-Basic Orientation	49
❑ LMTP	44
❑ ROBS	22
❑ Law Enforcement Field Instructor	13
❑ Law Enforcement for Supervisors	26
❑ Simunitions Training	16
❑ Defensive Tactics	11
❑ Small Craft Enforcement	2
❑ Firearms Instructor	5
❑ Archeological Resource Protection	15
❑ Physical Fitness Coordinator	<u>5</u>

Total Students 208

Basic Training Programs. Two categories of personnel attend basic law enforcement training, those who will be full-time refuge law enforcement officers and those who are collateral duty officers. Collateral duty candidates must have completed one year of satisfactory service prior to being eligible to attend law enforcement training.

Refuge officers basic training occurs in three phases: Pre-Basic Orientation; Land Management Training Program (LMTP); and Refuge Officer Basic School (ROBS). The Pre-Basic Orientation is a 16-hour course conducted at FLETC that precedes the LMTP. This course includes: administrative tasks (orientation, equipment issue, photographs), three hours; Refuge Administration Act, eight hours; and Refuge Policy, five hours.

Candidates then attend the LMTP, also conducted at FLETC. This general curriculum was developed for the six federal land management agencies: Fish and Wildlife Service; Forest Service; National Park Service; Bureau of Land Management; National Marine Fisheries, Department of Defense (game wardens); and the Tennessee Valley Authority. The program was developed in 1977 and been revised several times. The last review/revision occurred in 1993.

The LMTP curriculum consists of 480 hours of instruction, delivered in 59 days. Course work includes:

- ❑ **Behavioral Science Division.** Classes include Victim/Witness Awareness; Ethics and Conduct; Sexual Harassment; Cultural Diversity; Communications/Interviewing; Interviewing Lab; Interviewing Lab; Interviewing Practical Exercise; Conflict Management; Stress Management; Critical Incidents Stress and a Behavioral Science Lab. A total of 44 hours are devoted to this category.
- ❑ **Enforcement Specialties Division.** Classes include, Use of Force; Report Writing; Federal Firearm Violations; Sources of Information; Vehicle Searches; Execution of Search Warrants (lecture and lab); Surveillance (lecture and lab); Contemporary Violent Groups; Photography (lecture and lab); Description and Identification; Video (lecture and lab); Fingerprints; Rolled Prints; Latent Prints; Archeological Resource Crime; Crime Scene Processing; Rape Investigation; Crime Lab; Drugs of Abuse (lecture and lab); Land Management Patrol Skills; Larceny from Motor Vehicles; Marijuana Eradication and Death Investigations. A total of 88 hours are devoted to this category.
- ❑ **Legal Division.** Classes include Constitutional Law; Civil Rights; Federal Court Procedures; Criminal Law; U.S. Code; Conspiracy; Federal Tort Claims; Detention and Arrest; Self-Incrimination; Search and Seizure; Evidence; Courtroom; Practical Exercises and Mock Trial. A total of 82 hours are devoted to this part of the program.
- ❑ **Security Specialties Division.** Courses include, Threats to Land Management Agencies; Environmental Extremist Groups; Officer Safety and Survival for Land Management; Introduction to Tactics; Motor Home Search Lab; Building and Room Searches; Patrol Procedures Briefing; Bomb and Explosives and Booby Trap Lab. Nineteen hours are devoted to this division.

- ❑ **Driver and Marine Division.** Courses include, Emergency Driving (lecture and lab); Non-Emergency Driving (lecture and lab); Skid Control; Emergency Response Lab; Pursuit Driving (lecture and lab); High Risk Stops; DUI; Motor Homes Stops; Night Pursuit Driving and Accident Investigation. A total of 66 hours are devoted to this division.

- ❑ **Firearms Division.** Courses include Safety; Semi-Automatic (lecture and lab); Marksmanship Lecture; Survival Shooting Lab; Qualification; Downed/Disabled Officer; Reduced Light Shooting; Judgmental Shooting (lecture and practical exercise); M-16 (lecture and lab); Shotgun (lecture and lab); Shotgun/Combat Skeet; Handgun and Shotgun Stress; Reduced Light/Short Shotgun; Use of Cover Lab and Off-Range Safety. A total of 74 hours are devoted to firearms.

- ❑ **Physical Techniques Division.** Courses include Physical Efficiency Battery Pretest; Non-Lethal Control Techniques; Physical Conditioning; Impact Weapons; OC Spray and Transport of Reluctant Suspects. Eighty-one (81) hours are devoted to physical techniques.

An additional 21 hours are devoted to administrative matters such as orientations, exams, uniform turn-in and graduation.

Six (6) candidates failed the LMTP course of instruction from 1996 to 2000, all due to academic reasons. One hundred ninety-one (191) completed the program successfully. This is a 3% failure rate, which is not excessive.

Five examinations are administered during the program. Failure to obtain a passing score of 70% places a student on academic probation. The student is then given three working days to prepare for a remedial examination. If the student fails the second examination he/she is dismissed from training.

The final phase of basic training is the Refuge Officer Basic School (ROBS), an agency-specific training program. Every aspect of ROBS (developing, administering) is the responsibility of the refuge training coordinator at FLETC. At present this program is conducted at the Fish and Wildlife Service National Conservation Training Center, Shepherdstown, West Virginia.

ROBS may not follow the LMTP immediately. Since each LMTP class hosts members of five land management agencies, ROBS classes are scheduled when enough students are available to justify the expense of the program. Refuge officers who do not complete ROBS have restricted authority, essentially the same as seasonal employee. ROBS takes 10 days. The syllabus includes: Wetland Easement; Lacey Act and Federal Sentencing Guidelines; Authority and Jurisdiction; Report Writing; Civil Liabilities; Pressure Point Control Tactics; Endangered Species Act; Eagle Protection Act; Eagle Identification Act; National Wildlife Refuge System Act; Policy; Division of Law Enforcement; Division of Refuges Update; Airborne Hunting; Marine Mammal

Protection Act; Tracking and Sign Recognition; Officer Safety and Survival; Venomous Snake Safety; Migratory Bird Treaty Act; Duck Stamp Act; Practical Exercises (day and night); Mock Court; Course Review and Exam.

The Service manual addresses field training in a very limited way. Order 232 FW2 states that new refuge officers will have an orientation period of one year, during which time they will be “closely supervised.” Further, “whenever possible” a new officer will work “with an experienced officer. This system does not guarantee the proper supervision and evaluation of new refuge officers. This deficiency is recognized by personnel responsible for training refuge officers. There is a plan in the “talking stage” to have new officers attend the LMTP with ROBS immediately following at FLETC. The officers would then go home for two weeks, followed by assignment to a Field Training Officer at a station with an active law enforcement program for 30 days.

Seasonals undergo a different regimen. Prior to receiving a seasonal commission, FWS Order 232 FW2 mandates that the employee receive basic law enforcement certification in one of the following ways:

- ❑ Successfully complete a law enforcement training course approved by the Department and Service as a waiver to the LMTP. Waivers must be approved by the Chief, Division of Law Enforcement.
- ❑ Successfully complete a law enforcement training course at one of the accredited institutions approved for the seasonal law enforcement training program by the National Park Service.

The first situation usually applies to active law enforcement personnel, trained at the state or local level, who seek to work as a seasonal refuge officer for the Service. In the second case, there are 12 colleges that offer the seasonal law enforcement training program. This program was developed in 1977 by the NPS and is periodically monitored by the Park Service. The curriculum covers 285 hours and includes the following subject matter:

- | | |
|--------------------------|-----------|
| ❑ Legal | 58 hours |
| ❑ Behavior Science | 22 hours |
| ❑ Enforcement Techniques | 74 hours |
| ❑ Enforcement Operations | 30 hours |
| ❑ Law Enforcement Skills | 88 hours |
| ❑ National Park Service | 13 hours. |

During a site visit to Region 5 in Hadley, Massachusetts, the certification of the only two active seasonal officers in that region was inspected. In one case, the required letter of waiver was in place in the officer’s permanent file. In the other, a certificate of completion of the Seasonal Law Enforcement Training Program from the University of

Massachusetts was in the file. All mandates of 232 FW2 related to certification were met.

The Service recognizes the need for supervisors to understand law enforcement and mandates 20 hours of basic law enforcement training, every three (3) years (232 FW2). The course introduces supervisors to the liabilities, stresses and responsibilities associated with law enforcement.

The Training Coordinator at FLETC is responsible for this course. The 20-hour curriculum includes:

<input type="checkbox"/>	Policy	3 hours
<input type="checkbox"/>	National Wildlife Refuge System Act	4 hours
<input type="checkbox"/>	PPCT Demonstration	1 hour
<input type="checkbox"/>	Refuge Law Enforcement	3 hours
<input type="checkbox"/>	Report Writing	1 hour
<input type="checkbox"/>	Civil Liability	2 hours
<input type="checkbox"/>	Authority and Jurisdiction	2 hours
<input type="checkbox"/>	Public Use and Law Enforcement	1 hour
<input type="checkbox"/>	Washington Office Update	2 hours
<input type="checkbox"/>	Exam	1 hour.

No database exists centrally to reveal which supervisors have attended this course and which have not, clearly a deficiency. Regions are responsible for keeping this data. In FY 2000, 26 supervisors attended this training.

There are plans to expand this program. The training may be structured into three different sessions: one for supervisors who have never held a law enforcement commission; one for those who have previously held a commission, but have been out of law enforcement for over 10 years; and one for managers who have been out of law enforcement for less than 10 years.

In-Service Training. Regional Refuge Law Enforcement Coordinators are responsible for compliance with in-service training mandates of 232 FW2 and 445 FW4. The four western regions train jointly at a facility in Arizona. Their 300 officers are trained in four sessions of 75 officers each. Curriculum is developed by the four regional law enforcement coordinators who meet three/four times per year. Regions 3, 4, and 5 train separately. Curricula for Regions 3 and 4 are developed by committee, while Region 5 curriculum is developed by the coordinator alone. All must be approved by the Washington Office, Division of Refuges. The core curriculum must include concentrations on: policy; case reporting; legal; controlled substances; firearms; officer safety; and physical efficiency. Lesson plans are not approved, nor all classroom instructors necessarily trained/certified. All instructors are considered subject matter experts. Firearms and physical fitness instructors are trained and certified at FLETC, while PPCT defensive tactics instructors are certified by the program developer.

While various orders mandate annual training, they do not address what actions are to be taken if an officer does not complete training. The actions taken, if any, is contingent on policy developed at the regional level. According to the FLETC coordinator, the officer's police powers are to be suspended. There is no system-wide policy to mandate this action, however.

Advanced Training. The Training Coordinator is also responsible for the advanced training of refuge officers that occurs at FLETC. Regional offices fund some advanced training. This training is conducted at places other than FLETC, usually state, or local facilities.

In Fiscal Year 1999, funds were allocated for advanced training for 16 refuge officers. In Fiscal Year 2000, funding was provided for 44 officers:

- ❑ Law Enforcement Field Instructor Training Program 17 officers/4 days
- ❑ Archeological Resource Protection Training Program 15 officers/5 days
- ❑ Firearms Instructors 5 officers/10 days
- ❑ Physical Fitness Coordinator Training 5 officers/10 days
- ❑ Small Craft Enforcement Training 2 officers/4 days.

This amounts to 251 total advanced training days. Focus was developing a cadre of trained instructors who can support other Refuge training efforts.

Budget. The Refuge System established its training presence at FLETC in 1998. Only two years of budget data are available, Fiscal Years 1999 and 2000. For Fiscal Year 1999, \$202,948 was budgeted, which included \$157,624 for basic training of 40 students; \$31,560.17 for advanced training of 16 students; \$3,764.56 for a Law Enforcement Manager's training and \$10,000 for supplies. For Fiscal Year 2000, the total increased to \$240,574 to fund 48 students in basic training, 48 students in pre-basic, and 32 students in advanced training. The amount allotted for supplies remained at \$10,000. No funds are identified for the managers training program.

Projecting training costs for the LMTP program, which is the primary training activity at FLETC, presents a unique challenge. Given the growing number of students processed through the center, living accommodations are not always available on the campus. Since training must take place as scheduled, students are sometimes housed in local motels, which has a significant impact on cost. If a student is housed at the center, the daily cost is \$22 per student. If housed at a medium priced hotel the cost rises to \$51 per day. If accommodations can only be found at higher priced facilities, the cost is \$66 per day. This forces the Refuge Training Coordinator to make three separate projects for inclusion in the annual budget process.

Operating budgets of the individual refuges bear the expense of sending their officers to annual in-service training. Some Regions off-set these expenses but practice varies from Region to Region. Regional offices fund expenses such as instructor travel, ammunition, and some advanced training from their operating budgets.

The Washington Office of the National Refuge Law Enforcement Coordinator does not have a training budget. Hence, the only funds specifically allocated for training is that for the Refuge training coordinator at FLETC.

Refuge Law Enforcement Activity Reports. The training coordinator at FLETC issues a monthly report titled the Refuge Incident for Law Enforcement Report, or RIFLE. The bulletin describes recent system-wide law enforcement activity. The report is sent to all refuge officers to alert them to the different types of activity in the System.

Executive Development for Law Enforcement Managers. The Refuge System does not have any recognized law enforcement managers, only coordinators. It does not send anyone to schools such as the FBI National Academy.

EVALUATION

Primary measures of the effectiveness of the training function include: how well training initially prepares officers to perform their duties; how well officer skills are maintained over time; and how well officers are prepared to assume greater responsibility in the future. Surveys of refuge officers consistently show that they believe the training they are receiving is adequate. Nonetheless, there are numerous programmatic and administrative deficiencies that need to be addressed that, when corrected, will serve to strengthen the overall program. Improvements are required or available in organization/accountability, record-keeping, curricula, training sequence, training scope, and leadership development.

Organization and Accountability. Currently, training is not a carefully rationalized and strongly managed program but a network of policies and practices. We do not find a strongly integrated centralized-to-decentralized structure. Responsibilities are fragmented. The FLETC staff coordinate basic and some advanced training. In-service is managed at the regional level, where several patterns and approaches prevail. Planning for training needs is minimal and informal. It is not surprising that in absence of a strong unifying officer or system, record-keeping is limited. There are no professional training managers in place. At the regional level, law enforcement coordinators, some of who do this on a part-time basis, also do an admirable job, but have limited resources.

The first step to take to strengthen training activities is to anchor authority and responsibility. We recommend that the NWRS create the position of Manager of Refuge Law Enforcement Training. The manager should be a professional training administrator. He should be provided with adequate staff, both professional and support. Training records should be centralized in this office.

The recommended training manager would oversee all training, with an emphasis on formal planning. Goals, objectives and training plans (for the program and individuals) should be developed (already mentioned in existing Service policy, 231 FW2, Determining Training Needs).

By centralizing record-keeping, standardized documentation can be established. Further, this would serve as a method for assuring that training mandates are met as records are audited when submitted by the regions, or FLETC.

Finally, consideration should be given to housing this function at the NCTC. The resources available (distance learning, etc.) at the center should be put to greater use by the Refuge law enforcement training program.

Curricula. The LMTP curriculum needs exhaustive review. Inclusion of First Responder emergency medical and community policing training should be considered. Retraining officers with the PPCT system, which is different from the defensive tactics course taught in LMTP, is a practice that should be examined.

Periodic review of training programs to assess effectiveness and relevancy is an essential professional training practice. Review should take place at regular intervals – less than seven years. Our review of current curricula indicates that recruits receive no emergency medical training and are only required to hold certification in cardiopulmonary resuscitation (CPR) prior to employment. All law enforcement officers could be called upon to administer first aid at any moment. Given the remoteness and vast size of most refuges and the lack of community-based professional emergency medical aid, it would seem that medical training would be essential. As for community policing training, the “community” is those who visit the refuges. The LMTP and in-service programs are heavy with firearms/defensive tactics/physical conditioning, etc. The ability to work effectively with the community must be taught to ensure the highest level of service.

Most refuge officers, especially collateral duty officers, use defensive tactics very infrequently. Teaching two different systems (LMTP and PPTC) could cause confusion in times of stress. If the refuge system feels strongly about the PPCT, it should work to incorporate that system into the LMTP.

The course material for the ROBS training program should be reviewed. On average, this material is seven-years old, with some as old as 14 years. The policy related to American Indians is from 1994 and is marked “draft.” The material provided must be up-to-date and relevant.

Training Records. Number of training hours officers receive, the number of hours they receive in specialties, and currency of training (when officers were trained) are also critical measures of effectiveness of the training function. These measures cannot be applied in the current context due to the poverty of training data/records.

This gap also exposes the FWS/NWRS to unnecessary liability risks. While not totally defenseless, the Service would be quite vulnerable in failure-to-train litigation situations.

Training records – those that exist, are maintained at three places. Basic training and ROBS records are maintained at FLETC. The database at FLETC goes back only to 1983. In-service training records are maintained by regional coordinators. In Region 5, their database goes back only three years. Prior to that, they rely on the officers personal records. Semi-annual firearm records are maintained by the regions lead firearms instructor. Those records inspected lacked consistency. The potential for required training to be overlooked or the inability of the Service to produce training records is great and must be addressed.

Training Sequence. ROBS training should take place immediately following LMTP. An officer who has not yet attended ROBS is limited in the duties he/she can perform, which is inefficient. Further, the ability to integrate the material learned at ROBS with that learned at LMTP might be impaired if the time between classes is excessive. This concern is recognized by the training coordinator.

Field Training. The FWS/NWRS training framework is not complete without field training. The potential of basic training is seriously inhibited without field training – the “practicum.” Field training is difficult in most land management law enforcement settings. In most venues, the number and type of incidents and variations in environments limit the range of field training opportunities. The NWRS will have to accommodate these realities through program design innovations. Mounting training of refuges with high activity levels will help in some instances. Contracting with state and local police agencies can help in others.

Executive/Leadership Development. Should the Service develop law enforcement as a career path, sending managers to any of the several excellent executive development programs available for law enforcement managers would be of great benefit.

At present, there is no career path for law enforcement. Accordingly there are no law enforcement managers (only coordinators). The result is an absence of professionally trained law enforcement executives. This is a deficiency in the overall quality of the law enforcement program.

Firearms. The Service should standardize issued firearms. At present 445 FW4, Firearms, authorizes use of a plethora of service weapons. Each type of weapon requires different ammunition, maintenance, holsters, and training. By standardizing to one pistol, one shotgun and one rifle, many economies can be realized.

RECOMMENDATIONS

To upgrade law enforcement performance and productivity through improved training, the following actions should be taken:

1. **Create a coherent training structure headed by a Manager of Refuge Law Enforcement Training.**
2. **Review and revise the LMTP and ROBS curricula.**
3. **Establish and maintain a comprehensive training records system.**
4. **Re-sequence scheduling to ensure that ROBS training follows LMTP training immediately.**
5. **Establish a field training program.**
6. **Standardize issued firearms.**

SECTION 8: PROFESSIONAL STANDARDS

Every government has an obligation to its citizens to ensure that the actions of its employees are ethical and meet established standards of conduct. This objective is met through priority emphasis on an open and responsive citizen complaint process and uncompromising internal affairs practices. An effective system will also ensure citizens that policies and procedures are reasonable and effective, as thorough administrative investigations analyze every aspect of an issue, not just the actions of the employee.

The benefits of such practices accrue not just to the community being served, but to the agency itself and the very employee whose behavior is being examined. As for the agency, it benefits by being protected against unwarranted criticism, when actions and procedures are lawful and proper. Further, systematic deficiencies, such as training, or equipment, can be identified and remedied. Finally, patterns of inappropriate behavior, by individuals or groups, can be established and addressed. With regard to the individual employee, a frequently misunderstood benefit of thorough and fair investigations, is that it is the best way to protect that employee from false claims of misconduct by providing, beyond a reasonable doubt, that their actions were proper.

Professional standards are dealt with in an array of DOI and FWS policies and procedures documents:

- ❑ 446 DM, Chapter 2
- ❑ Fish and Wildlife Service Manual
 - Order 212 FW1
 - Order 441 FW1
 - Order 410 FW1
 - Order 410 FW2
 - Order 410 FW3

- Order 441 FW4
- Order 227 FW2

An OIG Memorandum provides (covers) professional standards guidelines.

Part 446 of the DOI manual, Chapter 2, addresses personnel qualifications and standards. It mandates adherence to the Departmental Law Enforcement Code of Conduct. (Table 17.) Law enforcement officers are required to:

- Be punctual
- Be courteous, considerate, patient and not use harsh, violent, profane, or insolent language
- Be familiar with statutes, ordinances and regulations
- Make required reports
- Provide name and badge number when requested
- Immediately report any injury, or loss/damage/theft of government property
- Be responsible for proper performance of assigned duties
- Not engage in any business which will interfere with the performance of duty.

The department manual states that law enforcement officers may be subject to immediate disciplinary action if guilty of the following types of misconduct:

- Performing or reporting for duty under the influence of drugs, or an intoxicating agent
- Using controlled substances, except as provided by law
- Malingering
- Insubordination
- Making untruthful statements
- Inefficiency or neglect of duty
- Receiving gratuities contrary to regulations
- Absence from duty without leave

Table 17

LAW ENFORCEMENT CODE OF CONDUCT

1. I will faithfully strive to abide by all laws, rules, regulations, and customs governing the performance of my duties.
2. In my personal and official activities, I will never knowingly violate any local, State or Federal laws or regulations, recognizing that I hold a unique position of traditional high public trust which carries an inherent personal commitment to uphold laws and the integrity of my profession. For these reasons, I understand that this code places special demands on me to preserve the confidence of the public, my peers, my supervisors, and society in general.
3. I will not knowingly commit any act in the conduct of official business or in my personal life that subjects the Department of the Interior to public censure or adverse criticism.
4. While a law enforcement officer, I will not accept outside employment that will in any way conflict with the law enforcement interests or jeopardize the activities or mission of the Department or gives the appearance of conflict.
5. As a law enforcement officer and representative of the Department, I will conduct all investigations and law enforcement functions assigned to me impartially and thoroughly and report the results thereof fully, objectively, and accurately.
6. In investigative process, I will be judicious at all times and I will release information pertaining to my official duties, orally or in writing, only in accordance with law and policy.
7. I will accept nothing, even of the slightest value, including favored treatment of any kind, from anyone on my own behalf or behalf of another person, recognizing that acceptance may result in a conflict or give the appearance of a conflict with my official duties or in my effectiveness as a law enforcement officer.
8. I will abide by all rules, practices and regulations of the Department including those relating to health, safety, and technical expertise requirements of my position.
9. I will not use any force greater than necessary to accomplish the mission of the Department.
10. I understand that this Code of Conduct is in addition to requirements imposed on me and applicable to all Department of the Interior employees as cited in Department regulations governing responsibilities and conduct of employees (43 CFR 20), which I have reviewed, and that a violation of this Code or provisions of the aforementioned regulations may be cause for disciplinary action or removal from the Department.

Name

Date

Source: Law Enforcement Handbook (446DM)
Chapter 2
Appendix 1

- Using unnecessary force
- Conviction in any court, of any crime
- Any conduct prejudicial to the reputation of the department.

The Fish and Wildlife Service Manual contains two orders that address conduct of service employees. Order 212 FW1, "Standards of Conduct," states that the policy and expectation of the Service is that all employees will maintain "especially high" standards of honesty, impartiality, character and conduct. Further, the conduct of employees must reflect the qualities of courtesy, integrity and loyalty. It establishes standards of ethical conduct, which mandate:

- Loyalty to the Constitution
- No financial conflicts of interest
- No financial transactions using non-public Government information
- No solicitation or acceptance of gifts
- An honest effort in performance of duties
- No unauthorized commitments or promises
- Not using public office for private gain
- Acting impartially
- Protecting and conserving Federal property
- No outside employment, or activities that conflict with official Government duties
- Disclosure of waste, fraud, abuse and corruption
- Satisfying obligations as citizens
- Adherence to equal opportunity laws and regulations
- Avoidance of actions that create the appearance of violating the law, or the listed standards of ethical behavior.

The conduct of Service law enforcement officers specifically is addressed in order 441 FW1, Code of Conduct. This order adopts the Code of Conduct contained in the Department manual.

It is essential to have procedures in place to receive and investigate complaints of violations of standards. Citizens have a right to initiate a complaint when a Service member's behavior falls short of their expectations. Further, Service employees have an obligation to report violation of law or established procedures by other employees. There are no procedures in place at the Department, Service, or refuge system level that address receiving, documenting and, in most cases, investigating complaints. No personnel are dedicated to investigating complaints and no records are kept concerning the number of complaints that are received. Procedures are "created" by the person who "answers the phone" when a complaint is made.

Written procedures are in place for investigations of very serious allegations that rise to the level of the Office of the Inspector General (OIG). In fact, three Service manual orders address OIG investigations. The first, 410FW1, Policy, Authority and Roles, states that the OIG is responsible for investigating alleged violations of Federal laws, rules, or regulations, or mismanagement, gross waste of funds, abuse of authority, or a substantial and specific danger to the public health and safety." Next, 410FW2, OIG Responsibilities and Procedures, states it is the responsibility of the OIG to investigate or arrange for the investigation of violations including, but not limited to, "false, fictitious, or fraudulent claims or disclosure of proprietary information; kickbacks on Departmental projects; misconduct by high level officials or persons in sensitive or fiduciary positions; conflicts of interest; travel fraud; time and attendance falsification; and gross waste or mismanagement. The third order, 410FW3, FWS Responsibilities and Procedures, states that all employees are responsible for reporting suspected irregularities to Service officials, or the OIG. One paragraph mentions "minor administrative irregularities" and says they must be examined and disposed of "within the service." Examples of these types of matters include insubordination, absence without leave, drinking on duty, altercations, illegal use of drugs on duty, or minor misuse of government telephones. It is interesting to note that illegal drug use while on duty is considered a minor administrative irregularity or trivial offense.

To clarify the role of the OIG, the Inspector General issued a memorandum on July 3, 2000 which outlines those matters that should be addressed at the office, or bureau level, and the process for making referrals to the OIG. The memo states that as a practical matter, the OIG cannot investigate every matter that may fall within the broad jurisdictional definition of their authority. The memorandum provides guidelines for allegations concerning integrity; waste, fraud and abuse or inefficiency; referrals to other legal authorities and management and administrative matters. As for integrity issues, only "serious matters" such as misconduct by supervisory personnel, allegations against employees at the GS-15 level and above and felony misconduct or domestic abuse by DOI law enforcement officers, must be referred to the OIG. Allegations of waste, fraud, abuse, or inefficiency are referred to the Assistant Inspector General for Investigations. Referrals to other legal authorities include personnel practices, which go to the Office of Special Counsel, and complaints of discrimination to the Equal Employment Opportunity Commission. Employee grievances are to be referred to the Merit System Protection Board and health and safety violations are the responsibility of the Occupational Safety and Health Administration. Finally, it is considered more "efficient" to address certain matters at the administrative or management level. These include: time and

attendance violations; delinquent payment on government credit cards; non-fraudulent misuse of government credit cards; non-fraudulent misuse of government property; and allegations of sexual harassment. The Office of the Inspector General could not provide any data on the number of complaints investigated at that level, either in general or specific to the law enforcement program.

The final document that deals with investigations is 441 FW4, Investigations of Employee Conduct. The intent and actual meaning of the document is being interpreted differently by different employees. The order specifically states that service law enforcement officers are not authorized to investigate “matters of alleged official or nonofficial misconduct involving another Service employee unless the alleged misconduct or irregularity involves a violation of a Federal or State statute or regulation over which the Division of Law Enforcement has investigative authority.” It later says supervisors have the authority to take “initial steps” to “confirm or deny” allegations. During discussions with refuge law enforcement personnel, some believe this directive prohibits investigations of misconduct by employees with law enforcement authority. The language of the directive seems to support this interpretation. Given the number of collateral duty law enforcement personnel, including many in supervisory positions, this apparent limitation on the authority to conduct investigations into alleged employee misconduct is problematic.

Finally, should an administrative investigation substantiate allegations of misconduct against an employee, policies and procedures are necessary to govern the disciplinary process. The Service manual, 227FW2, Disciplinary and Adverse Actions, establishes comprehensive policies and procedures for taking action against employees. Actions covered by this directive include:

- A letter of warning
- A letter of reprimand
- A suspension of 14 days, or less
- A suspension of more than 14 days
- A reduction in grade
- A reduction in pay
- A furlough of 30 days, or less.

The authority for 16 other types of disciplinary or adverse action are also listed in this order. For example, a reduction in grade or removal is governed by 5U.S.C., Section 4303, Actions Based on Unacceptable Performance.

EVALUATION

Principal measures of officer behavior and an agency's ethical standards include:

- ❑ The number of and trends in citizen and employee-initiated complaints
- ❑ The number of and trends in sustained citizen and employee-initiated complaints
- ❑ Number of and trends in the most serious types of complaints
- ❑ Complainant satisfaction with agency response to complaints.

Total absence of a professional standards statistical base prohibits application of the primary measures. This is a law enforcement management gap that has to be closed.

In addition to a need to create a reliable professional standards database, substantial work is required to give form to professional standards practices. With the exception of serious allegations of misconduct that rise to the level of the Office of the Inspector General, the Service simply lacks the structure to deal with internal affairs matters. The Service is, in many ways, failing in its obligation to its customers/citizens to ensure that the actions of refuge law enforcement officers are ethical and meet established standards of conduct. The most significant single step is to fix authority for Professional Standards. Our proposed organization calls for an Office of Professional Standards. Second, the disparately located policies and procedures must be consolidated and issued in a non-conflicting user-friendly form. This will entail revolving the ambiguity in 441 FW4. Supervisors can and should conduct many types of internal investigations. Personnel with law enforcement training are knowledgeable in investigative techniques. Non-law enforcement personnel who are concerned about being investigated by those with law enforcement powers can be reassured by the System: instituting comprehensive policies and procedures that address the conduct of internal investigations.

In this regard, directives could be located which provide direction concerning the procedures to conduct and investigations of employee misconduct, the burden of proof required, or case classification (sustained, exonerated, etc.).

RECOMMENDATIONS

To highlight the commitment of the Service to the highest ethical law enforcement standards, the following actions should be taken:

1. Establish an Office of Professional Responsibility.

In view of initial workload requirements, including directives consolidation and database development, at least two full-time professionals are required. The

- number of investigators that may be required is unanswerable in absence of incident data.
- 2. Issue a policy statement, from the Director, stating in unqualified terms, that the Service desires to be open and responsive to citizen complaints and concerns. Further, that this is a priority of the Service.**
 - 3. Develop comprehensive complaint procedures that:**
 - a. Include readily available written and electronic material on how to file a complaint, express a concern, or pay a compliment**
 - b. Mandate that all complaints be recorded, including anonymous complaints**
 - c. Empower/require all employees to receive complaints.**
 - d. Require employees to report inappropriate behavior/misconduct**
 - e. Require written notification to the complainant that a complaint was investigated and a decision made.**
 - 4. Ensure that all Service employees receive training in these policies and procedures.**
 - 5. Develop standardized investigative procedures that ensure:**
 - a. Fair and thorough investigations**
 - b. Investigations of serious allegations (not rising to OIG level) such as violations of state law, and use of excessive force, at the regional level**
 - c. Training for those who will conduct investigations.**
 - 6. Establish a case tracking system which includes:**
 - a. Records of all complaints forwarded to the Regional Law Enforcement Coordinator (RRLEC)**
 - b. An Early Warning System to ensure accurate tracking of RLEO's to identify potential problems.**
 - 7. Ensure that the RRLEC is responsible for tracking all complaints and ensuring compliance with policy.**

8. **Ensure that the RRLEC compiles quarterly and annual reports and forwards them to the Washington Office law enforcement coordinator.**
9. **Ensure that the national office prepares an annual report to the Director that addresses, among other things, the four areas highlighted in the Evaluation section.**
10. **Establish procedures to guarantee that once cases have been disposed of, files are maintained. Policies and procedures to be established should require that:**
 - a. **Closed case files are maintained at the regional level, in secure storage, with limited access.**
 - b. **Documentation concerning complaints and their outcomes (for sustained cases at a minimum) are made part of the officers' permanent files, subject to applicable Federal personnel regulations).**

Finally, it was observed during a site visit that the regional law enforcement coordinator lacked a private office. Given the sensitivity of internal investigations (even telephone conversations concerning those) the RLEC should have a private office. This would also assure secure storage of records, interviews, etc.

SECTION 9: INFORMATION MANAGEMENT

Law enforcement information management is decentralized. Refuges generate a number of law enforcement reports. The most important are:

- ❑ Incident Report: used to report serious, Uniform Crime and FWS incidents.
- ❑ Drug Incident Report: used to report possession, use, or cultivation of a controlled substance on Service lands. This includes violations reported by other law enforcement agencies.
- ❑ Notice of Violation:
- ❑ Field Information Report (Pink Slip):

Regional Refuge Law Enforcement Coordinators have record-keeping responsibilities. Coordinators receive incident reports from refuges, yearly summary reports on serious and minor offenses and enforcement actions, and prepares a regional report for the national office. Most information forwarded to the regional office involves information for preparation of Uniform Crime Reports.

With the exception of summary information for the Uniform Crime Report, most crime and incident information remains in the original report. Incident reports are kept at the Refuge level, in either paper form or in a computerized database. Copies of significant incidents and crimes are forwarded to the region.

LEIR. Efforts have been made to computerize the refuge law enforcement record process. Utilizing a database program entitled File Maker Pro, a computer program has been developed to permit on-line entry of all local reports into a local database. This program, LEIR (Law Enforcement Incident Reporting System) resides on a local microcomputer at the refuge. File Maker Pro is particularly friendly for formal reports. It sets up standard reports, identifies variables of interest, abstracts these variables for special analysis, generates summary statistics in report format. LEIR software was originally developed by a RLEO to facilitate his own report entry requirements. This officer frequently updates the program and adds new features.

LEIR provides a number of summary reports, the most important of which is the refuge Uniform Crime Report. LEIR generates the Monthly Report (Form 3-2017) and the Annual Verification Report (Form 3-2094). Information is entered into the system daily. The system automatically calculates and completes the forms. This module also tracks administrative items. One sub-routine tracks and provides summary overtime statistics.

LEIR supplies a case management module which permits officers to process violations. Based on entry of a incident report, the system prepares prosecution reports. It also tracks the status of pending cases and generates violation statistics for annual reports. From the initial report, LEIR automatically generates a Field Information Report (Pink Slip), a Notice of Violation (NOV), a mailing label, and a transmittal sheet. Photographs can be digitally stored with the report.

RMIS, LEMIS and NCIC/State Systems. Three additional information systems have relevance for the refuge law enforcement. RMIS (Refuge Management Information System) is utilized by refuges to budget, capture activity information and manage projects. A number of information resources captured by RMIS are potentially useful for a law enforcement information management system. RMIS and LEIR do not interface.

LEMIS, the law enforcement information system of Fish and Wildlife's Division of Law Enforcement, provides a nationwide database of offenses, investigations; persons, incidents, intelligence and other law enforcement information. Remote sites are linked to this nation wide system. There is considerable information in LEMIS that is relevant for refuge law enforcement. Refuge law enforcement does not have access to LEMIS. Equally important, LEMIS does not have access to refuge law enforcement information.

For immediate operational law enforcement information such as warrants and wants, persons information, auto registrations, refuge law enforcement depends upon local police information resources. NCIC (National Crime Information Center) and state crime information centers are generally accessed through local law enforcement

agencies. Refuges have cooperative agreements with local agencies for these law enforcement information resources.

Connectivity. Most refuges are networked to the regional offices. These connects are used primarily for e-mail. Some connections are primitive by current standards. Due to line noise, and/or party lines in some remote areas, connections either cannot be made or transmissions occur at an unbelievably slow pace. Considerable information transfer continues to be paper based particularly from remote locations.

Current networks frequently operate at 2400 BAUD. While such slow rates of information transfer can be worked around, they do limit options. Future consideration may need to be given to upgrading infrastructure in some areas or introduction of alternative networking technologies.

If future developments in refuge law enforcement call for integrated information systems, an important design component will have to address the often tortured transmission rates.

EVALUATION

NWRS law enforcement information capabilities are primitive. Immediate and dramatic response must be a highest priority to upgrade management capacity at central headquarters and in the regions and operational capacity on-the-ground (in the refuges).

Evaluation, analysis, planning, and parallel management obligations are impaired by absence of a comprehensive management database. The data displays presented in Chapter 1 and the difficulty experienced by FWS and the IACP in assembling the data is instructive. Each data set resulted from a separate, often inefficient, initiative. Once available, reliability issues quickly became evident. A number of important data sets never became available, data as fundamental as staffing trends.

Intent to conduct important analysis were instantly aborted due to an inability to disaggregate data (such as Other Offenses).

The NWRS is urged to design a suitable management information system for use by clientele throughout the System, but particularly at the Washington and regional levels. To do so, the MIS Office proposed earlier must be established. Because this may take some time, the System is strongly encouraged to hire and outside vendor.

Refuges have an additional set of information requirements. Presently, information resources for refuge law enforcement operations is insufficient. Important information remains inaccessible to most users. Data is difficult to retrieve. Actual records reside mainly at the local level. Only summary reports are forwarded to regional offices. There is considerable difference among regions in sophistication and style of record

handling. A number of law enforcers are not computerized. Regional and national law enforcement information capacity remains largely paper-based and is characterized by summary statistics only.

A nationwide refuge law enforcement operations database is needed that links all refuges. Development of this nationwide system should be a priority. Refuges should be able to enter data directly into this system. Investigators, with proper authorizations, should also be able to access and search relevant data sets within this database. The system can build on the several system in place, with modifications. LEIR has strong positive that should be incorporated into the nationwide refuge operations database.

LEIR is user friendly, easy to learn and easy to use. It automates the paperwork process, providing important time-saving features to those who are knowledgeable about the system. LEIR operates within the context of a database program. This permits LEIR to provide summary reports and to generate a wide range of statistics. For those officers knowledgeable about File Maker Pro, almost any data entered into the system can be retrieved in a number of different formats and reports. LEIR is password protected. Levels of security are provided permitting limitation such as read only.

LEIR is technically supported in the regions. Most regions have a technician trained in LEIR who can provide user support for program set-up and use. Training is offered to refuge officers. Most full time officers have received training. While LEIR is generally supported, staff did caution that some areas of the country are not providing full technical support for LEIR.

LEIR has important negatives that must be dealt with. It is not universally utilized. A number of refuges still use only paper reports. Utilization of LEIR is particularly low among collateral officers. While numbers are not readily available about which refuges use LEIR and which do not, the general impression is that utilization varies by region and by size of refuge and by time available for law enforcement (full-time or collateral). In refuges that do not use LEIR, standard paper formats are used and summary statistics are calculated by hand.

LEIR is refuge based. Data resides at the local level and cannot be electronically shared. Area refuges cannot electronically tap into the other refuge databases to search for similar events or activities by the same perpetrator. Information from local refuges is maintained only at the regional and national level in summary form.

LEIR's current Uniform Crime Report system module provides summary reports only. LEIR does not support NIBRS (National Incident Based Reporting). The program developer is holding off on a possible upgrade to a NIBRS format until the NWRS decides whether Refuges will continue to utilize LEIR or move to another information system.

Currently, a number of refuges and refuge officers do not participate in LEIR. Training and assistance should be provided to these sites and officers. Once such training and

technical assistance is provided, participation should be mandated. With all information entered into this system, the system becomes that much more useful and comprehensive.

The nationwide refuge data should link to LEMIS. There is information in the LEMAS database that would be of assistance to refuge law enforcement and similarly information in local refuges could provide valuable information to the Division of Law Enforcement. Refuge law enforcement databases could be developed as a module on LEMAS.

There is essential information in RMIS that would be an asset to a refuge law enforcement information data system. Data on visitor counts, size of areas to be patrolled, boundary lengths and other refuge descriptors would provide potential workload and effectiveness indicators for planning, deployment, and evaluation purposes. Efforts should be made to link the information resources of refuge law enforcement and RMIS.

There is much to be gained by providing refuge officers with information on incidents and patterns that occur at neighboring and area refuges. In today's highly mobile society, what occurs elsewhere will soon occur at neighboring locations. Sharing information among refuges can provide important enforcement benefits.

Efforts should be made to improve the telecommunications infrastructure that serves refuges. Party lines and poor connections make data transfers over phone lines difficult, insecure and, in some cases, impossible. Upgrading phone service could be costly in some locations. Alternative satellite linked communications could be considered for such areas.

RECOMMENDATIONS

To enhance law enforcement management and operations, the following information capacity building actions should be taken:

- 1. Establish an Information Management Office at the national level.**
- 2. Develop a nationally operated management information system.**

This system should be able to deliver macro-level information such as that set forth in Chapter I, fill current data gaps, and yield to disaggregation for analytical purposes.

- 3. Develop a national refuge operations law enforcement database.**

This database would permit inquiries from individual law enforcement officers as well as provide summary information to national and regional decision-makers.

4. Incorporate the report generation and user-friendly elements of LEIR when developing the national refuge database and associated software system.

5. Ensure that all refuge law enforcement participate in the electronic entry of reports into the national database.

The regional offices should provide computer support services.

6. Ensure that information from the refuge law enforcement system is available to the Division of Law Enforcement.

7. Ensure that LEMIS is open to inquiries from refuge law enforcement.

Refuge enforcement information could be designed as a module on LEMIS.

8. Integrate the refuge law enforcement and RMIS databases.

Information from RMIS can provide valuable information for law enforcement deployment, program evaluation and individual productivity. Information from the refuge law enforcement can provide RMIS with increased functionality.

9. Improve telecommunication capabilities among refuges and regional and national offices.

In most cases this will involve upgrades to existing phone lines. In areas where this is impractical consideration should be given to alternative technologies such as satellite links.

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

To give every Refuge law enforcement manager and officer a voice in the study, workforce surveys were conducted. The surveys were designed to elicit opinions about:

- ❑ **Safety**. Judgments concerning law enforcement capacity to safeguard natural resources; visitors; personal safety; communications systems; and back-up support.
- ❑ **Law Enforcement Objectives**. Judgments concerning outcomes sought by the National Wildlife Refuge System and by individual refuges.
- ❑ **Job Preparation and Direction**. Judgments concerning effectiveness of basic training; in-service training; policies and procedures; and supervision.
- ❑ **Career Conditions**. Judgments concerning recruitment and selection; promotion and job assignment practices; performance evaluation; discipline practices; information; and collateral duty work.
- ❑ **Management Obligations**. Judgements concerning accountability; program evaluation; and provision of appropriate law enforcement equipment, technology, and information support.
- ❑ **Innovation**. Recommendations for improving the NWRS law enforcement function.

Two populations were surveyed, officers and managers. Surveys were not identical in construction but did include parallel questions.

SECTION 1: SURVEY POPULATION

Survey participation was voluntary. Confidentiality of responses was pledged. Respondent names were not called for. Names of refuge or region of employment was optional, as was job classification. Age, years of service with FWS, and education were called for.

The survey was distributed to every officer in every class: Refuge Law Enforcement Officers (full-time); Refuge Operations Specialists; Outdoor Recreation Planners; Police Officers; Maintenance Workers; Park Rangers; Biological Technicians; and Refuge Biologists. Responses totaled 302, 50.2% of officers. The survey was distributed to every manager in every class: Refuge Managers; Refuge Supervisors; Regional Refuge Chiefs; and Regional Directors. Responses totaled 236.

SECTION 2: SURVEY RESULTS

Survey results are summarized in Tables 18, 19, and 20. Tables 18 and 19 summarize the responses of officers and managers. Responses are ranked from most to least favorable, using the “satisfactory” dimension. Table 20 displays comparative “inter-class,” ratings of three components of the law enforcement workforce, the full-time RLEOs, Refuge Operations Specialists, selected to represent all collaterals who perform law enforcement duty, and managers (all classes). Responses in this array are also ranked from most to least satisfactory, using the “satisfactory” dimension (of officers).

Table 18			
WORKFORCE SURVEY RESULTS – OFFICERS			
Practices and Conditions	Satisfactory	Neither Satisfactory Nor Unsatisfactory	Unsatisfactory
<input type="checkbox"/> In-Service Training	85.3	10.2	4.4
<input type="checkbox"/> Basic Training	82.1	14.9	2.9
<input type="checkbox"/> Enforcement Objectives - Refuge	80.0	12.4	7.7
<input type="checkbox"/> Enforcement Objectives – NWRS	77.6	18.0	4.4
<input type="checkbox"/> Safety – Personal	76.6	15.1	8.4
<input type="checkbox"/> Direction/Guidance – Refuge Mgr.	62.9	17.7	19.4
<input type="checkbox"/> Policies and Procedures	58.7	31.3	10.0
<input type="checkbox"/> Direction/Guidance – Regional Law Enforcement Coordinator	58.5	22.4	19.0
<input type="checkbox"/> Discipline Practices	53.2	24.9	22.0
<input type="checkbox"/> Equipment/Technology/Information	50.6	25.5	23.9
<input type="checkbox"/> Safety – Visitors	49.8	25.6	24.6
<input type="checkbox"/> Collateral Duty – Good Idea	48.9	15.0	36.2
<input type="checkbox"/> Direction/Guidance – Regional Managers	46.9	23.8	29.2
<input type="checkbox"/> Promotion Practices	46.4	23.2	30.5
<input type="checkbox"/> Performance Evaluation	45.7	25.2	29.1
<input type="checkbox"/> Safety – Natural Resources	39.5	27.2	33.2
<input type="checkbox"/> Program Evaluation	38.4	33.1	28.5
<input type="checkbox"/> Accountability – Directors/Managers	37.5	32.1	30.4
<input type="checkbox"/> Communications Systems	27.3	19.6	53.2
<input type="checkbox"/> Recruitment and Selection	25.6	26.0	48.3
<input type="checkbox"/> Back-up Accountability	18.9	18.3	62.8

Table 19			
WORKFORCE SURVEY RESULTS – MANAGERS			
Practices and Conditions	Satisfactory	Neither Satisfactory Nor Unsatisfactory	Unsatisfactory
<input type="checkbox"/> Enforcement Objectives – NWRS	80.9	13.1	6.2
<input type="checkbox"/> Training – L.E. Management	73.0	28.6	35.3
<input type="checkbox"/> Safety – RLEOs	67.6	17.5	15.0
<input type="checkbox"/> Equipment/Technology/Information	62.8	24.4	12.8
<input type="checkbox"/> Direction/Guidance – Immediate Supervisor	54.2	21.8	24.0
<input type="checkbox"/> Safety -- Visitors	41.7	18.7	39.6
<input type="checkbox"/> Enforcement Objectives – Refuge/Region	36.1	28.6	35.3
<input type="checkbox"/> Program Evaluation	34.2	29.0	36.8
<input type="checkbox"/> Communications Systems	29.6	21.5	48.9
<input type="checkbox"/> Safety – Natural Resources	28.2	21.4	50.5
<input type="checkbox"/> Back-Up Availability	10.3	17.7	71.9
<input type="checkbox"/> Accountability – Directors/Managers	43.9	30.2	25.9

Table 20			
WORKFORCE SURVEY RESULTS – INTER-CLASS COMPARISON			
Practices and Conditions	RLEOs (Full-Time)	Refuge Operations Specialists	Managers
<input type="checkbox"/> In-Service Training	77.5	88.7	--
<input type="checkbox"/> Basic Training	76.2	87.1	--
<input type="checkbox"/> Enforcement Objectives – Refuge	76.2	77.0	36.1
<input type="checkbox"/> Enforcement Objectives – NWRS	78.6	70.6	80.9
<input type="checkbox"/> Safety – Personal/Self	73.9	74.3	67.6
<input type="checkbox"/> Direction Guidance – Refuge Managers	54.7	65.9	--
<input type="checkbox"/> Policies and Procedures	42.9	60.2	--
<input type="checkbox"/> Direction Guidance – Regional LE Coordinator	50.0	51.3	--
<input type="checkbox"/> Discipline Practices	47.6	54.6	--
<input type="checkbox"/> Equipment/Technology/Information	47.5	54.1	62.8
<input type="checkbox"/> Safety – Visitors	40.5	46.8	41.7
<input type="checkbox"/> Collateral Duty – Good Idea	14.3	50.0	--
<input type="checkbox"/> Direction/Guidance – Regional Manager	32.5	36.4	--
<input type="checkbox"/> Promotion Practices	28.6	57.8	--
<input type="checkbox"/> Performance Evaluation	40.5	45.9	--
<input type="checkbox"/> Safety – Natural Resources	28.5	38.6	28.2
<input type="checkbox"/> Program Evaluation	39.0	37.6	34.2
<input type="checkbox"/> Accountability – Directors/Managers	35.7	37.4	43.9
<input type="checkbox"/> Communications Systems	23.8	30.3	29.6
<input type="checkbox"/> Recruitment & Selection	28.5	19.3	--
<input type="checkbox"/> Backup Availability	28.6	11.9	62.8
	(n=42)	(n=109)	(n=236)

Of 21 conditions and practices examined by officers, 10 (48%) are rated satisfactory by a majority of respondents and 11 (52%) are not. Of 12 conditions and practices examined by managers, five (42%) are rated satisfactory by a majority of respondents and seven (58%) are not. Interclass comparison reveals high levels of agreement on all but a few conditions and practices rated.

SAFETY

Officers and managers were asked to judge the capacity of the NWRS law enforcement system to safeguard visitors, natural resources, FWS workers, and to protect officers themselves. Perspectives were also sought on the capacity of current law enforcement communications practices and backup availability, both lifeline issues for officers.

Visitors and Workers. The ability of refuges to safeguard visitors and workers is considered to be satisfactory by only half of officers. The remaining half split evenly, regarding ability as neither satisfactory nor unsatisfactory or unsatisfactory. Managers judge NWRS protection capability less favorably than officers both full time and collaterals. Satisfactory ratings are somewhat lower, and unsatisfactory ratings higher.

<u>Visitor Safety</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	50%	26%	24%
<input type="checkbox"/> Managers	42%	19%	40%
<input type="checkbox"/> Officers – Full-Time	41%	24%	36%
<input type="checkbox"/> Refuge Operations Specialists	47%	20%	26%

There is some disparity among full-time and collateral duty officers, with full-time officers reporting a much higher negative (unsatisfactory), about 10%.

Natural Resources (Wildlife). Both officers and managers feel even less confident about the ability of the NWRS to safeguard wildlife than its ability to protect visitors – significantly less confident, and managers feel distinctly less confident than officers, overall. Only 40% of officers and 28% of managers judge current capacity to be satisfactory. The negatives (unsatisfactory) is especially high for managers, 51%.

<u>Natural Resources</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	40%	27%	33%
<input type="checkbox"/> Managers	28%	21%	51%
<input type="checkbox"/> Officers – Full-Time	29%	26%	45%
<input type="checkbox"/> Refuge Operations Specialists	39%	29%	32%

A disparity is evident between full-time and collateral officers, with full-time officers reporting much less confidence in NWRS capacity than collaterals.

Officer Safety. Officers are secure in regard to personal safety. Managers are somewhat less secure but still highly confident about officer safety. The negatives in this set are very marginal.

<u>Officer Safety</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	77%	15%	8%
<input type="checkbox"/> Managers	68%	18%	15%
<input type="checkbox"/> Officers – Full-Time	74%	12%	14%
<input type="checkbox"/> Refuge Operations Specialists	74%	19%	6%

Disparities between full-time and collateral officers are not significant.

Communications Systems. Both officers and rangers resoundingly criticize the inadequacy of law enforcement communications. With the exception of the back-up situation, this condition drew the highest negatives in the survey.

<u>Communications & Safety</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	27%	20%	53%
<input type="checkbox"/> Managers	30%	21%	50%
<input type="checkbox"/> Officers – Full-Time	24%	14%	62%
<input type="checkbox"/> Refuge Operations Specialists	30%	21%	49%

The disparity pattern that emerged between full-time and collateral duty officers on previous issues emerges, again, on this one.

Back-Up. Availability of law enforcement back-up for officers that are in threatening situations is regarded least positive of all conditions and practices surveyed. Two-thirds of officers and three-quarters of managers consider back-up capacity to be unsatisfactory.

<u>Back-Up</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	19%	18%	67%
<input type="checkbox"/> Managers	10%	18%	72%
<input type="checkbox"/> Officers – Full-Time	29%	14%	57%
<input type="checkbox"/> Refuge Operations Specialists	12%	21%	67%

The response of full-time officers is notable. It is measurably more favorable than any other class of respondents, including collateral duty officers.

OBJECTIVES

Officers and managers were asked to rate their level of understanding of the law enforcement objectives of the National Wildlife Refuge System and their own refuges. Divergent response patterns emerge in this condition/practice area. Both officers and

managers report highly satisfactory understanding of NWRS objectives, for managers, the highest positive in the entire survey. With regard to refuge objectives, officers and managers diverge dramatically. Officers report an 80% satisfactory (high understanding) rate. The rating of managers, 36%, is not even half of that of officers.

<u>NWRS Objectives</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	78%	18%	9%
<input type="checkbox"/> Managers	81%	13%	6%
<input type="checkbox"/> Officers – Full-Time	79%	14%	7%
<input type="checkbox"/> Refuge Operations Specialists	71%	27%	3%

<u>Refuge Objectives</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	80%	12%	8%
<input type="checkbox"/> Managers	36%	28%	35%
<input type="checkbox"/> Officers – Full-Time	76%	10%	14%
<input type="checkbox"/> Refuge Operations Specialists	77%	16%	7%

No meaningful disparity exists between full-time and collateral duty officers on either item.

JOB PREPARATION AND DIRECTION

Officers were asked to judge the quality of basic training, in-service training, written policies and procedures, direction and supervision – all critical components of job preparation and direction. Managers were asked to judge the quality of the supervision they receive on law enforcement matters and the training they have received for law enforcement leadership and management.

Basic Training – Officers. Officers have an exceptionally high level of satisfaction with the basic training for their law enforcement activities. Four of five, 82% report satisfaction. Only 3% deem their training to have been unsatisfactory. Full-time have a slightly less favorable regard for basic training than do the collaterals.

<u>Basic Training</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	82%	15%	3%
<input type="checkbox"/> Officers – Full-Time	76%	24%	0%
<input type="checkbox"/> Refuge Operations Specialists	87%	10%	3%

In-Service Training – Officers. Officers are even more satisfied, though marginally, with in-service training, recording an 85% satisfactory rating. In this area of practice, as in the basic training area, Refuge Operations Specialists regard training somewhat more satisfactorily than officers as a class, and measurably more favorable than full-time officers.

<u>In-Service Training</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	85%	10%	4%
<input type="checkbox"/> Officers – Full-Time	78%	13%	10%
<input type="checkbox"/> Refuge Operations Specialists	89%	8%	3%

Policies and Procedures – Officers. Officer responses confirm weakness with written directives. While a majority, 59%, consider written policies and procedures to be satisfactory for guiding actions, 41% do not. Ten percent (10%) consider current policies and procedures to be unsatisfactory, 31% consider them to be neither satisfactory nor unsatisfactory. For a condition/practice as fundamental as policies and procedures, this rating is not considered acceptable.

<u>Policies and Procedures</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	59%	31%	10%
<input type="checkbox"/> Officers – Full-Time	43%	33%	24%
<input type="checkbox"/> Refuge Operations Specialists	60%	32%	8%

Full-time officers regard policies and procedures far less favorably than collateral duty officers or all officers, combined.

Training – Managers. Almost three-quarters of managers (73%) consider the training that they have received to lead and manage the law enforcement function to be satisfactory. Only 11% consider it to be unsatisfactory. The remainder, 16%, consider it to be neither satisfactory nor unsatisfactory.

Direction/Supervision – Officers. Direction and supervision from three levels were offered for appraisal. Officers were to judge the law enforcement guidance received from Refuge Managers, Regional Managers, and Regional Refuge Law Enforcement Coordinators. Managers were to rate direction and guidance.

Of three levels of direction, guidance, and supervision, officers believe the best is provided from the most immediate level, Refuge Managers. Just over 60% believe the guidance from this level to be satisfactory. At the same time, 37% do not, 19% of these respondents reporting that supervision from Refuge Managers on law enforcement matters is not satisfactory.

<u>Direction – Refuge Managers</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	63%	18%	19%
<input type="checkbox"/> Officers – Full-Time	55%	17%	29%
<input type="checkbox"/> Refuge Operations Specialists	66%	16%	19%

As consideration moves to the regional level officer assessments decline. Less than a majority of officers, 47%, believe that the direction and guidance received from Regional Managers is satisfactory. Neutral (neither satisfactory nor unsatisfactory) and unsatisfactory ratings are significant, 24% and 29%.

<u>Direction – Regional Managers</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	47%	24%	29%
<input type="checkbox"/> Officers – Full-Time	33%	23%	45%
<input type="checkbox"/> Refuge Operations Specialists	36%	31%	33%

Regional Law Enforcement Coordinators are appraised more favorably than Regional Managers. Almost 60% of officers appraise direction and guidance from this source to be satisfactory. At the same time, 41% do not.

<u>Direction – Regional LE Coordinator</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	59%	22%	19%
<input type="checkbox"/> Officers – Full-Time	50%	26%	23.8%
<input type="checkbox"/> Refuge Operations Specialists	51%	28%	21%

Significant disparity between full-time and collateral officers exists only with regard to supervision from Refuge Managers. The prevailing pattern – lower ratings by full-time officers, prevails in this instance.

Direction and Supervision – Managers. Managers are not particularly satisfied with direction and guidance on law enforcement matters. A bare majority, 54%, consider the supervision they receive to be satisfactory. Close to a majority, 46% do not appraise supervision favorably, 24%, declaring their condition to be unsatisfactory.

CAREER CONDITIONS

Recruitment, selection, promotion, job assignment, performance evaluation, discipline, and collateral duty 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.

Recruitment and Selection. The negative views accorded to current recruitment and selection practices is surpassed only by those accorded to the back-up situation. Almost half of NWRS officers declare recruitment and selection practices to be unsatisfactory. Only one-quarter regard them to be satisfactory.

<u>Recruitment and Selection</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	26%	26%	48%
<input type="checkbox"/> Officers – Full-Time	29%	26%	45%
<input type="checkbox"/> Refuge Operations Specialists	19%	27%	54%

Responses to this item are characterized by a reversal of the prevalent disparity pattern. In this instance, full-time officers report more favorably (satisfactory) than collateral duty officers.

Promotion. Officer perspectives on promotion and job assignment practices vary measurably. The largest proportion, somewhat less than half, consider them to be satisfactory. Almost one-quarter are neutral. Almost one third regard them as unsatisfactory. The dimension of this negative is notable.

<u>Promotion and Job Assignment</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	46%	23%	31%
<input type="checkbox"/> Officers – Full-Time	27%	7%	64%
<input type="checkbox"/> Refuge Operations Specialists	58%	23%	19%

Refuge Operations Specialists returned a far more favorable response than the class as a whole, 58% regarding this area of practice as satisfactory. The extreme negative, 65%, from full-time officers stands out.

Performance Evaluation. Performance evaluation ratings mirror those accorded to promotion and job assignment practices. The dimensions of the negative and neutral ratings are notable. This data set has more consistency overall due to greater congruence of full-time and collateral officer ratings. Still, the 40% negative from full-time officers isolates itself.

<u>Performance Evaluation</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	46%	25%	29%
<input type="checkbox"/> Officers – Full-Time	41%	19%	40%
<input type="checkbox"/> Refuge Operations Specialists	46%	28%	26%

Discipline. The discipline profile resembles many others. Somewhat over half of the respondents consider discipline practices to be satisfactory. The remaining half split, close to evenly, along neither satisfactory nor unsatisfactory and unsatisfactory lines. The Refuge Operations Specialist. Full-time officers subsets show typical disparity.

<u>Discipline</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	53%	25%	22%
<input type="checkbox"/> Officers – Full-Time	48%	21%	31%
<input type="checkbox"/> Refuge Operations Specialists	55%	27%	19%

Collateral Duty. All officers and Refuge Operations Specialists believe the collateral duty is a sound idea. A large minority of each group, just exceeding one-third, do not believe collateral duty is a sound idea (is unsatisfactory).

<u>Collateral Duty</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	49%	15%	36%
<input type="checkbox"/> Officers – Full-Time	14%	17%	69%
<input type="checkbox"/> Refuge Operations Specialists	50%	13%	37%

Full-time officers reject the concept by an almost 8.5 to 1.5 margin.

MANAGEMENT OBLIGATIONS

Accountability, program evaluation, and acquiring suitable law enforcement equipment, technology and information support are primary management obligations. Workforce perspectives on these conditions and practices follow.

Accountability. Just over one-third of officers, believe that the degree to which Regional Directors and Refuge Managers are held accountable for law enforcement program administration is satisfactory. Managers rate the accountability factor only slightly higher. Just over 40% believe that the degree to which Managers and Regional Directors are held accountable is satisfactory. Negatives (unsatisfactory) among classes range from 26% for managers to 30% for officers, to 48% for full-time officers.

<u>Accountability</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	38%	32%	30%
<input type="checkbox"/> Managers	44%	30%	26%
<input type="checkbox"/> Officers – Full-Time	36%	17%	48%
<input type="checkbox"/> Refuge Operations Specialists	37%	37%	25%

Program Evaluation. Law enforcement program evaluation practices are considered satisfactory by little more than one-third of every class of respondent. Approximately one-third of each class considers them to be unsatisfactory. The remaining third considers them neither satisfactory nor unsatisfactory.

<u>Program Evaluation</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	39%	33%	29%
<input type="checkbox"/> Managers	35%	29%	37%
<input type="checkbox"/> Officers – Full-Time	39%	27%	34%
<input type="checkbox"/> Refuge Operations Specialists	38%	36%	27%

Equipment, Technology, and Information. Just over half of all officers deem their supply of law enforcement equipment, technology, and information to be satisfactory. A large segment, 24%, considers the supply to be unsatisfactory. An equal proportion delivered neutral ratings.

Managers regard the equipment/technology situation more favorably, recording a 63% satisfactory rating and only a 13% unsatisfactory rating.

<u>Equipment, Technology, and Information</u>	<u>Satisfactory</u>	<u>Neither</u>	<u>Unsatisfactory</u>
<input type="checkbox"/> Officers – All	51%	26%	24%
<input type="checkbox"/> Managers	63%	24%	13%
<input type="checkbox"/> Officers – Full-Time	48%	10%	43%
<input type="checkbox"/> Refuge Operations Specialists	46%	28%	26%

Full-time officers and Refuge Operations Specialists reported approximately favorable ratings but disparate unsatisfactory ratings. Full-time officers reported a 43% unsatisfactory rating compared to just 26% for Refuge Operations Specialists.

SECTION 3: BUILDING BLOCKS

As the law enforcement function of NWRS evolves or is re-engineered, along lines recommended in this report, or others, it should build on foundations of quality – practices and conditions that are currently sound, measured by objective professional criteria, workforce satisfaction, or both. Using the workforce satisfaction criterion, several building block areas emerge from the survey.

- ❑ NWRS Enforcement Objectives
- ❑ Law Enforcement Officer Personal Protection Capacity.

Both classes of law enforcement stakeholders – officers and managers, are positive about these two conditions. We have noted the absence of measurable objectives, which should call the validity of workforce perspectives at least into question. Still, both groups express comfort with understanding of desired outcomes. Similarly, the confidence in personal protection capacity must be tempered with the serious concerns expressed about failure in the areas of communications and back-up support.

Officer training should be recognized as a building block. Officers are highly positive about both:

- ❑ Basic Training
- ❑ In-Service Training

Officers are also positive about Refuge Law Enforcement objectives. Our observation about FWS objectives applies in this case as well.

Managers are positive about equipment, technology, and information support.

We believe substantial upgrading is required in all three areas.

SECTION 4: UNMET NEEDS

The workforce is united that shortfalls of three kinds exist:

- ❑ Insufficient capacity to achieve the core law enforcement mission
- ❑ Infrastructure and support

- Human resources management.

The range of perceived unmet needs surpasses the range of perceived building blocks. Collectively, the workforce has not delivered a vote of confidence in the capacity of the NWRS to ensure safety – of wildlife, visitors, or officers. Job preparation and direction is strong in the training areas, but falls short in policies and procedures with regard to several layers of supervision. Career conditions are poorly regarded, from recruitment through performance evaluation. Management obligations are not being met well.

Both officers and managers regard the following conditions and practices to be unsatisfactory:

- Capacity to Safeguard Natural Resources
- Capacity to Safeguard Visitors
- Program Evaluation
- Accountability of Directors and Managers
- Back-up Availability
- Communications Systems and Technology.

Officers regard the following conditions and practices as unsatisfactory:

- Collateral Duty
- Direction and Guidance from Regional Managers
- Promotion Practices
- Performance Evaluation
- Recruitment and Selection.

Officers regard the following practices as marginally satisfactory:

- Direction and Guidance from Refuge Managers
- Policies and Procedures
- Direction and Guidance from Regional Law Enforcement Coordinators
- Equipment, Technology, and Information.

Managers regard the refuge enforcement objectives situation quite negatively.

As the law enforcement function of the NWRS evolves or is re-engineered, the foregoing unmet needs require attention. The unanimity that exists among officers and managers, in six important areas of need, can safely serve as a framework for priorities. We concur with the workforce on the special significance of these needs.

SECTION 5: THE CHANGE CULTURE – OBSERVATIONS ON CLASS

The entire change process, from program design to implementation, is illuminated through understanding of the values, positions, and probable receptivity and resistance of stakeholders to be affected by change. NWRS workforce survey responses supplies insights that should be useful for approaching change.

The responses indicate greater overall agreement among classes of respondents concerning the state of conditions and practices than we find in many law enforcement environments. This bodes well for constructive change.

Full-time and collateral duty officers have, generally, similar views on practice and conditions. In almost all cases, however, full-time officers are somewhat more critical than collaterals.

Finally, workforce survey responses supply indicators of types of change likely to be supported and welcomed by classes of law enforcement stakeholders. Based on high-to-extreme negative responses (unsatisfactory).

- ❑ **Managers:** Back-up (72%); natural resources protection (51%); communications (50%); visitor safety (40%); program evaluation (37%); refuge objectives (34%).
- ❑ **Officers – Full-Time:** Collateral duty (69%); promotions and job assignment (64%); communications systems (62%); back-up (57%); management accountability (48%); natural resources protection (45%); direction from regional managers (45%); recruitment and selection (45%); law enforcement equipment technology, and information (43%); performance evaluation (40%); visitor safety (36%).
- ❑ **Officer – Collateral Duty:** Back-up (67%); recruitment and selection (54%); communications systems (49%); collateral duty (37%); natural resources protection (32%).

SECTION 6: REMEDIES AND OPPORTUNITIES

NWRS managers and officers suggest an interesting range of insightful remedies for addressing perceived shortfalls and a series of constructive ideas for upgrading refuge law enforcement. Consensus choices are outlined below.

Safety. To enhance visitor, worker, property, and refuge law enforcement officer safety the action recommended most frequently by officers is to increase the size of the law enforcement staff. Managers are even more emphatic in support of this action. They recommended this action by a 6-1 ratio over the second most recommended action in this category – limiting use of collateral duty officers.

Training. The types of training cited most frequently by officers to enable them to perform the law enforcement function more effectively are:

- Field Training (assigning new officers to busy refuges or local law enforcement agencies to gain experience is referenced repeatedly)
- Officer Survival and Defensive Tactics
- Legal Updates
- DUI/DWI
- Interviewing and Investigation Skills
- Verbal Communications Skills
- Drug Recognition.

A significant proportion of officers did not respond to this item.

Managers express different training needs:

- Developing Objectives – Understanding What Law Enforcement Is to Accomplish
- Advanced Law Enforcement Management – Administration, Supervision
- Standard, Advanced Annual Refresher (40 hours, FLETC-Approved)
- Inter-agency Coordination and Communication
- Verbal Communication Skills (Verbal Judo).

Managers echoed officer needs in tactical areas, but references were significantly less frequent than those associated with objectives development and measurement requirements.

Equipment, Technology, and Information. To conduct their law enforcement function more effectively and enhance safety, officers most frequently recommend:

- Upgrading communications systems and radios. Features desired are refuge-state/local communications interoperability; upgraded satellite communications; 24-hour computer-aided dispatch; dedicated law enforcement channels; cell phones
- Night-vision equipment, surveillance cameras, and remote sensors
- More law enforcement vehicles, and earlier replacement of current vehicles

- NCIC access.

Managers recommendations parallel those of officers. Most frequently recommended actions are:

- Upgraded communications systems (features recommended mirror those of officers)
- Surveillance cameras and remote sensors
- Satellite beepers and cell phones
- More law enforcement vehicles and more frequent replacement
- Better signage.

Overall, managers recommended a greater range of technology than officers.

Resource Leveraging. Officers cite very few law enforcement or other activities that they deem to be of questionable value:

- 88 respondents cite none (“no” in the question).
- Activities cited, with very low frequency, (five being the most frequent) include maintenance duties, clerical duties, coordinating VIP visits.

Managers responses parallel those of officers. Almost 200 (179) cite none, i.e., law enforcement officers do not perform any activities, law enforcement or other, that are of questionable value. Thirteen (13) cite “too many administrative duties.”

Restructuring Strategies. Asked to cite activities that are not currently conducted but could contribute to law enforcement objectives, officers most frequently recommended:

- More resource protection, with night and weekend (24-7) patrol.

The most frequent comment concerned inadequacy of staffing. Variations of “inadequate staffing does not allow for proactive patrol or backup” were offered by 23 officer respondents. The number of “none” responses exceeded all others.

Managers were more responsive on this item, but share the same perspective:

- Increased resource protection, with night and weekend patrols
- Communications and partnerships with national, state, and local law enforcement agencies, through MOUs

- Working with communities.

Sixty-seven (67) managers declared there are no activities (none) that law enforcement do not currently perform that could contribute to achievement of law enforcement objectives.

Constructing A More Effective Law Enforcement Function. To construct a more effective law enforcement function for visitors, officers recommend:

- Increasing law enforcement staffing in order to intensify proactive patrol and enhance officer safety
- Clarifying the law enforcement objectives of FWS and make those objectives public
- Reprioritizing refuge budgets. Funding law enforcement as a separate line item. Increasing law enforcement appropriations
- Facilitating (improving) communications between full-time and collateral duty officers
- Limiting collateral duties for law enforcement officers. (These recommendations were from full-time officers exclusively.)

The 6c coverage issue and improved pay for law enforcement received multiple mentions.

The most frequently recommended action from managers, as from officers, is:

- Increase law enforcement staffing, coupled in many instances with funding as a line item, and increasing the number of full-time officers.

Also recommended prominently by managers are the following actions:

- Retain and expand the number of collateral duty officers
- Clarify law enforcement objectives, with emphasis on protection of resources and visitors
- Implement MOUs/agreements of authority/and strengthen relationships with neighboring agencies
- Develop career ladders for officers
- Replace seasonals with permanent or subject-to-furlough positions
- Improve communications and dispatch systems.

CHAPTER IV: INDEPENDENT VOICES

During the course of study we were able to review five earlier audits and studies of the NWRS law enforcement function:

- ❑ Region 4, Staff Study, 1986
- ❑ Audit and Evaluation of Refuge Law Enforcement, PES, USFWS, 1991
- ❑ RLE Review, Chitwood, 1992
- ❑ PES Review, 1992
- ❑ Internal Control Review, 1994.

These audits vary in purpose, scope, and no doubt methodology. Their conclusions and recommendations focus on approximately 25 subjects of relevance to the NWRS law enforcement function. Principal findings and recommendations are summarized in Table 21.

Problems Ignored and Opportunities Missed. Admitting to the imprecision and subjectivity which is inherent in comparative analysis of survey evaluations, the summaries in Table 21 suggest, with a substantial level of confidence, that many NWRS law enforcement conditions singled out for attention in this report have existed for many years and have been singled out for attention by earlier analysts and auditors. The following are most consequential to law enforcement effectiveness (and lack thereof):

- ❑ An Under-Developed Central Direction and Accountability Structure
- ❑ Police and Procedure Inadequacies
- ❑ Recruitment and Selection Issues
- ❑ Cooperative Agreement and MOU Initiatives
- ❑ Communications Equipment Shortfalls
- ❑ The Professional Standards – Inspections Gap
- ❑ Training Gaps – FTO and Leadership.

Implications of Findings. The reinforcing nature of successive audits accords credibility to many of the observations and recommendations set forth in this report. Of greater significance is the import of the comparative analysis for change expectations. Failure to modify the many inhibiting conditions pointed out by auditor after auditor may be attributable to complacency of NWRS leadership, secondary status of law

enforcement, higher priority of other issues, resource shortfalls, or other reasons. Whatever the explanation, NWRS law enforcement organizational transformation history does not bode well for the future, especially with leadership transition on the immediate horizon. Hopefully, champions of change will emerge and employ the results and recommendations of this audit more constructively than has been the case with previous audits.

Table 21						
PREVIOUS AUDITS AND STUDIES – COMPARISON OF FINDINGS						
Issue Area	Region 4, Staff Study, Oct 1, 1986	Audit & Evaluation of Refuge LE by PES, USFWS, Feb 4-7, 1991	Feb 22, 1992, RLE Review by Chitwood	May 15, 1992, PES Review	1994 Internal Control Review	IACP Review 2000
Accountability, control and direction from Washington		<p>Found an absence of accountability with confused or absent direction from DC.</p> <p>REC: strengthen guidance and control from HQS (Ps-Summary Section).</p>	<p>Division of Refuges LE Coordinator should be organizationally attached to the Division Chief's office [also a PES report concern] (Pg ii).</p>	<p>No documentation indicating satisfactory management control of the LE function. No guidance, direction, and oversight provided by DC office.</p> <p>REC: FWS should designate a single position responsible for service-wide law enforcement policy development, program coordination, and oversight. Pg 2, F-1).</p>		Prior findings still relevant
Policy Development		<p>Found overlapping and duplicative policy and guidelines.</p> <p>REC: combine policy and regulatory handbooks of DLE and Div of Refuges (PES Summary Section).</p>	<p>Up-date current law enforcement policy and guidance on case management, chain-of-custody of evidence, use of less than lethal weapons, search and seizure, and inventory procedures (pg iii) Update and revise Law Enforcement Handbook (Pg iii).</p>	<p>Little or no policy development No service policy book;</p> <p>REC: develop a system-wide policy manual (Pg 3 F-3)</p> <p>No viable documented search and seizure policy.</p> <p>REC: Develop and implement a consistent search and seizure policy consistent with 446 DM, Federal law and regulations. (Pg 7 F-11)</p>	<p>Policies and procedures not updated in a timely fashion.</p> <p>REC: Access Lexis/Nexis for real time updates in legal issues; Division LE should update specific sections of the 37 chapters of the service manual,</p> <p>with 13 already done (Pg Summary)</p>	Prior findings still relevant.

<p align="center">Table 21</p> <p align="center">PREVIOUS AUDITS AND STUDIES – COMPARISON OF FINDINGS</p>						
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<p>Enforcement and Investigative Case Management.</p>	<p>Confusion over proper use of plainclothes and undercover operations (actual incidence predominantly plainclothes) (Pg 7)</p>	<p>No formalized case management found in refuges; DLE has LEMIS: REC: implement LEMIS (DLE program) for all refuges (Ps Summary Section)</p>	<p>Incorporate case management into the LEMIS II program and include refuge LE statistics in the FWS National Incident Based Reporting System (NIBRS), [PES issue] (Pg iii)</p>	<p>No case or investigative management program in place.</p> <p>REC: develop and implement a system-wide case management program, or include Refuge officers in LEMIS II, as well data to NIBRS; utilize data as support for expanded LE program (Pg 4 F-4).</p>		<p>Did not study.</p>
<p>Controls for LE program</p>	<p>Regional supervisors should provide oversight on refuge level LE operational decisions made by refuge managers/ project leaders, to include budgetary allocations (Pg 13).</p> <p>Develop performance standards for the LE function (Pg 15).</p>	<p>No controls present.</p> <p>REC: conduct system-wide functional review (Pg Summary Section).</p>		<p>No inspections program in place. Those conducted are done without the presence or input of an LE specialist trained or experienced in such audits or inspections. Completed reports of inspections or evaluations do not reach headquarters level for proper analysis and appropriate action.</p> <p>REC: None listed (Pg 3 F-3).</p> <p>Functional control review program did not include Division of Refuges (DOR).</p> <p>REC: include functional reviews in schedule and conduct (Pg 3, F-2).</p>		<p>Findings still relevant.</p>

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Training Issues	<p>Increased training in areas such as defensive tactics, criminal investigation (Pg 8-9).</p> <p>Provisions for a Field Training Officer (FTO) program (Pg 13).</p> <p>Regional LE coordinator should take lead in develop-ing program for regional use, to include checklist (Pg 14).</p>	<p>Little or no training for LE managers.</p> <p>REC: Training program should be developed for managers of LE programs similar to NPS and BLM versions (Ps Summary Section).</p>	<p>Develop and implement annual in-service training programs for LEOs.</p> <p>Implement LE training for non-LE managers that addresses more technical information on LE operations, as well as a focus on the need for technical review and evaluation of refuge officers performance. (Pg ii & iv).</p> <p>Provide all FT LEOs training in criminal investigation, interviewing techniques. (Pg iv).</p> <p>Provide national standards for training of seasonal LEOs. [PES issue] (Pg iv).</p>	<p>No mgr training course.</p> <p>REC: dev one similar to NPS (Pg 7 F-13).</p> <p>No headquarters level tracking of in-service training and firearms qualifications.</p> <p>REC: establish headquarters level tracking of these and other issues. (Pg 6 F-10).</p>		Findings still relevant.
Surveillance standards or policy			<p>Provide all FT LEOs training in surveillance and covert operations. (Pg iv).</p>	<p>No documented standards or policy in place for surveillance or undercover operations by refuge personnel.</p> <p>REC: Develop and implement standards for surveillance and undercover operations to include training require-ments prior to engaging in same(Pg 5 F-7).</p>		Did not study.

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Carrying weapons aboard aircraft				<p>No policy on carrying weapons aboard common carrier aircraft.</p> <p>REC: establish a policy similar to that used by DLE and allowed by FAA regulations and DM 446 (Pg 5 F-8).</p>		Condition Corrected.
Serious Incident Reporting System		<p>No standardized SIR program found.</p> <p>REC: develop and implement a SIRs program service-wide (Ps Summary Section).</p>		<p>No SIR program in place.</p> <p>REC: develop and implement SIR program service-wide (Pg 4 F-4).</p>		
Less than lethal weapons policy		<p>No policy found on less than lethal weapon carrying.</p> <p>REC: establish policy and insert in training program (Ps Summary Section).</p>		<p>No policy for training with less than lethal weapons.</p> <p>REC: training and certifications for use and carry should be given priority consideration in FWS defensive tactics policy revisions. (Pg 5 F-9).</p>		Findings still relevant.
Controls and tracking of LE commissions		<p>Absence of any control or ability to track.</p> <p>REC: establish a HQS controlled issuance and tacking system to include pre-requisites for issue (Ps Summary Section).</p>	<p>Establish national level system to track LE commissioning, training, background investigations, and firearms qualifications (Pg iii).</p>	<p>No tracking in place.</p> <p>REC: establish HQS control and tracking of all commissioning ; include firearms qualification, in-service training. (Pg 3, F-3; Pg 6 F-10).</p>		Did not study.

Table 21						
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Collateral versus Full Time LEO function			Address the differences in duty responsibilities between collateral, full-time and seasonal LEOs. (Pg ii). Develop a standardized Refuge Law Enforcement Needs Assessment format to be used by all refuges to establish staffing levels. (Pg iii).			Second Finding Still Relevant.
Standardized Job Series and Position Descriptions and Career Ladders for FT LEOs.	Identified need for standardized job descriptions for LEOs (Pg 8).	Absence of standardized PDS. REC: review FT positions for consistency, job series, and applicability for special retirement and pay reform coverage (Pg Summary Section).	Standardized PDs should be established in 5/7/9 grade levels (PES) for system-wide use when recruiting FT LEOs. (Pg iii). Use a separate organizational title to distinguish FT LEOs from collateral duty officers. (Pg iv).	Write standard PDs at 5/7/9/11 levels and forward to Personnel for action to correct lack of career ladder for refuge officers (Pg Summary).		
Standardized PDs for Regional LE Coordinator		Found loose control and oversight of LE coordinator resulting in varying effectiveness: REC: professionalize position and re-assign under AD for LE (Pg Summary Section).	Develop standardized PDs for regional LE coordinators (Pg ii) Attach to Asst Regional Director, Refuges & Wildlife (Ps ii).	No standard PD or established responsibilities for LE coordinators. REC: Create PDs for like positions that are consistent with duties and responsibilities of LEOs; supervisors and managers of LEOS should be LEOs also; reinstate LE Managers Course previously offered by FWS. (Pg 7, L-12). LE coordinator do not have LE authority or commission.		

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				REC: None listed (Pg 6 F-10).		
Reporting of criminal events policy				Design and utilize an adequate incident reporting system (Pg Summary).		Condition addressed. More work to be Done.
MOU guidelines and standards		No MOUs found or if found lack consistency, even with DLE. REC: aggressively move to establishing MOUs at all levels and lateral areas of mutual support (Pg Summary Section).		No guidelines or standards for developing cooperative agreements or MOUs, grants or contacts for LE on refuges or cooperative assistance by refuge officers off jurisdictions. REC: Initiate and aggressively pursue legislative action carefully coordinated with Department for omnibus authorities for LEOs and Special Agents in FWS. Formalize working relationships with other federal LE. (Pg 8, F-14)		Findings still relevant.
Evidence control and storage				No documented controls in place, no policy found. REC: develop standards and procedures for evidence control and storage, schedule routine compliance inspections. (Pg 4 F-5).		Did not study.
Seasonal LE program		Seasonal program lacks direction, control, and evaluation of effectiveness.		The seasonal LE program is without documented direction and control. Div of		Some conditions addressed.

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		REC: review the appropriateness and control of the seasonal program, with some effort directed at establishing levels of control and specialized training availability. (Pg Summary Section)		Refuges staff is not involved in curriculum review and approval of seasonal LE training. REC: Review by Div of Refuges of the seasonal LE program, establish formally recognized levels of authority and specialized training approval. Develop written standards for the training, appointment and commissioning of seasonal LE personnel. (Pg 5 F-6)		
Authority and Jurisdiction Issues relative to Absence of Concurrent Jurisdiction on most refuges	Identified concerns by LEOs over their actions on refuges in the absence of concurrent jurisdiction (Pg 9). At least one LEO per refuge should obtain State LE authority to address problems with absence of concurrent jurisdiction (Pg 13).					Did not study.
Safety Issues	Collateral Duty LEOs are not as prepared for LE action either physically or mentally (Pg 10). Sufficient staffing to ensure that LEOs do not work alone at night (pg 12).					Findings still relevant.

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Recruitment Issues	Clearly advise all applicants of the LE functions required for collateral duties (Pg 12).			Pre-employment suitability background investigations are not conducted on Div of Refuges LE personnel as required by 441 DM, 446 DM, and FPM 731 and 723, to include periodic updates and review. REC: Establish a viable background investigation program to include updates and reviews. (Pg 6 F-10).		Condition addressed.
Planning process	All stations should have a LE plan with a format specified by Branch of Planning (Pg 12). Regional LE coordinator should take lead in ensuring compliance and standardization for review at Regional level (Pg 14).		Revise Service Manual Part 602, Management Planning to prescribe for a Law Enforcement Plan as a mandatory operational plan at every refuge. (Pg iii).			Did not study in-depth.
Radio Systems	Division of Refuges, coordinated by the regional LE coordinator, needs to ensure that a radio system is in place that allows LEOs to contact refuge offices from anywhere in the refuge (Pg 14).			Purchase radios and frequencies to support 24/7 radio capability (Pg Summary).		

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Coordination with DLE	Remove the liaison function from DLE and allow refuge level LEOs to coordinate directly with the court on appearances and violation filing [Not concurred by ARD LE](Pg 15).					Did not study.
Law Enforcement Retirement Issues			Division of Refuges and Division of Personnel should prepare a request and justification for inclusion of FT LEOs under the Law Enforcement Retirement System [PES issue] (Pg iv).			Did not study.
Recruitment and Selection			Follow guidance in Part 446, Chapter 2 of Departmental Manual for selection of LE personnel. (Pg iii). Develop and implement a central hiring system similar to DLE for hiring FT LEOs. (Pg iii).			Findings still relevant.

Appendix 1

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Ace Basin	47	50	62	+15	32
Agassiz	24	59	24	0	--
Alamosa	17	13	18	+1	6
Alaska Peninsula	10	7	2	-8	-80
Alligator River	26	79	127	101	388
Amaganset	0	--	10	10	--
Anahuac	119	279	85	-34	-29
Ankeny	115	119	15	-100	-87
Antioch Dunes	1	6	8	7	700
Appert Lake	2	2	5	3	150
Aransas	95	83	230	135	142
Arapaho	8	8	6	-2	-25
Archie Carr	0	0	--	--	--
Arctic	12	4	6	-6	-50
Arrowwood NWR	0	4	7	+7	--
Arrowwood WMD	21	18	12	-9	-43
Arthur Marshall	311	968	868	557	179
Ash Meadows	3	24	31	28	933
Atchafalaya	0	32	7	7	-
Attwater	0	8	--	--	--
Audubon NWR	5	13	4	-1	-20
Audubon WMD	66	45	44	-22	-33
Back Bay	104	137	259	+155	148
Bald Knob	31	85	--	--	--
Brandon Marsh	0	0	--	--	--
Banks Lake	8	40	32	24	300
Baskett Slough	120	120	39	-81	-68
Bayou Cocodrie	11	16	13	+2	18
Bayou Sauvage	91	110	--	--	--
Bear Lake	3	4	--	--	--
Bear River	600	519	235	-365	-60
Bear Valley	0	0	0	0	--
Becharof	6	6	0	-6	100
Benton Lake NWR	3	14	18	+15	83
Benton Lake WMD	7	11	3	-4	-57
Big Boggy	7	5	7	0	--
Big Branch	157	49	--	--	--
Big Lake	8	0	--	--	--
Big Muddy	4	6	310	+306	7,650
Big Stone NWR	3	0	--	--	--
Big Stone WMD	0	--	--	--	--
Big Williams	45	45	55	+10	22
Bitter Lake	160	134	108	-52	-33
Blackbeard	12	19	10	-2	-17
Blackwater	12	65	54	42	350
Blowing Wind	0	0	0	0	--

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Bogue Chitto	92	137	--	--	--
Bombay Hook	176	259	295	119	68
Bon Secour	17	33	53	36	211
Bond Swamp	96	35	40	-56	-58
Bone Hill	0	1	--	--	--
Bowdoin NWR	2	--	29	27	1,350
Bowdoin WMD	0	--	4	4	--
Boyer Chute	102	124	189	87	85
Brazoria	10	17	34	24	240
Breton	16	40	--	--	--
Browns Park	17	17	32	+15	88
Buenos Aires	49	--	43	-6	-12
Buffalo Lake	1	1	--	--	--
Butte Sink	0	0	--	--	--
Cabeza Prieta	0	0	52	+52	--
Cabo Rojo	20	0	0	-20	-100
Cache River	252	170	210	-42	-17
Caloosahatchee	0	0	--	--	--
Camas	1	2	--	--	--
Cameron Prairie	14	20	15	+1	7
Cameron Billsbach	0	--	--	--	--
Canaan Valley	0	2	17	+17	--
Canfield Lake	2	2	5	+3	150
Cape Meares	0	0	--	--	--
Cape Romain	21	21	18	-3	-14
Carlton Pond	0	0	0	0	--
Carolina Sandhills	18	26	102	+84	467
Catahoula	95	40	32	-63	-66
Cedar Island	0	0	0	0	0
Cedar Keys	21	35	--	--	--
Cedar Point	3	0	--	--	--
Charles Russell NWR	206	180	145	-61	-30
Charles Russell WMD	0	0	--	--	--
Chase Lake NWR	0	3	--	--	--
Chase Lake WMD	15	15	31	+16	107
Chassahowitzka	58	44	150	+92	159
Chataugua	3	2	--	--	--
Chickasaw	83	27	6	-77	-93
Chincoteague	1,718	2,060	1,746	28	-2
Choctaw	149	110	197	48	32
Cibola	125	75	92	-33	-26
Clarence Canyon	5	5	--	--	--
Clear Lake	4	4	7	3	75
Cold Springs	7	6	12	5	71
Columbia	80	21	40	-40	-50
Colusa	5	26	28	+23	460
Conboy Lake	29	23	30	+1	3
Conscience Point	5	--	20	15	300

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Crab Orchard	1,025	696	990	-35	-3
Crane Meadows	5	4	3	-2	-40
Crescent Lake	27	18	14	-13	-48
Crocodile Lake	15	--	--	--	--
Crosby	5	7	32	27	540
Cross Creeks	38	--	3	-35	-92
Crystal River	48	44	--	--	--
Culebra	12	0	2	-10	-83
Currituck	172	118	86	-86	-50
Cypress Creek	1	12	--	--	--
D'Arbonne	9	11	--	--	--
Dahomey	0	3	--	--	--
Dakota Lake	0	0	2	2	--
Deep Fork	40	40	115	75	188
Deer Flat	58	58	117	59	102
Delevan	4	13	27	23	575
Delta	28	50	--	--	--
Des Lacs	7	11	9	2	29
Desert National	32	31	41	9	28
Desoto	469	385	604	135	29
Detroit Lakes	86	24	53	-33	-38
Devils Lake	2,890	98	160	-2,730	-95
Don Edwards	143	190	304	161	113
Driftless	0	880	13	13	--
Dungeness	50	50	67	17	34
Eastern Neck	4	8	13	9	225
Eastern Shore	4	13	5	1	25
Edwin Forsythe	105	237	319	214	204
Egmont Key	2	15	--	--	--
Elizabeth Morton	70	--	202	132	189
Ellicott Slough	0	0	--	--	--
Emiquon	0	2	--	--	--
Erie	78	14	35	-43	-55
Eufaula	105	78	53	-52	-50
Farallon	1	2	2	1	100
Felsenthal	80	167	88	8	10
Fergus Falls	51	67	60	9	18
Fern Cave	0	0	4	4	--
Fish Springs	56	508	22	-34	-61
Flint Hills	15	19	29	14	93
Florence Lake	2	2	3	1	50
Florida Panther	0	33	66	66	--
Ft. Niobrara	18	32	80	62	344
Fox River	2	3	2	0	--
Franz Lake	0	0	2	2	--
Grand Cote	5	--	3	-2	-40
Grays Harbor	15	10	10	-5	-33
Grays Lake	3	0	--	--	--

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Great Bay	48	61	47	-1	-2
Great Dismal Swamp	65	322	150	85	131
Great Meadows	20	2	120	100	500
Great Swamp	17	208	262	245	1,441
Great White Heron	100	--	--	--	--
Grulla	0	0	--	--	--
Guam	98	30	29	-69	-70
Hagerman	33	10	72	39	118
Hailstone	0	0	--	--	--
Hakalau Forest	0	0	0	0	--
Halfbreed Lake	0	0	--	--	--
Hamden Slough	11	9	6	5	-46
Hanalei	55	18	15	-40	-73
Harris Neck	21	60	96	75	357
Hart Mountain	10	6	10	0	--
Hatchie	3	1	0	-3	100
Havasu	22	26	37	15	68
Hawaiian Island Complex	4	--	--	--	--
Hawaiian Island NWR	1	8	--	--	--
Hillside	64	34	65	1	2
Hobart Lake	0	--	--	--	--
Hobe Sound	54	38	40	-14	-26
Holla Bend	50	42	20	-30	-60
Horicon	32	40	40	8	25
Huleia	2	0	2	0	--
Humbolt Bay	5	13	14	9	180
Huron NWR	0	--	--	--	--
Huron WMD	13	12	22	9	69
Hutchinson Lake	0	0	3	3	--
Imperial	200	250	644	444	222
Innoko	10	11	33	23	230
Iowa	1	10	2	1	100
Iroquois	5	70	23	18	360
Island Bay	0	0	--	--	--
Izembek	19	18	9	-10	-53
J. Clark Salyer NWR	14	10	12	-2	-14
J. Clark Salyer WMD	92	4	30	-62	-67
J. N. Ding Darling	99	95	157	58	59
James Campbell	25	52	23	-2	-8
James River	0	0	0	0	--
John Hay	1	0	--	--	--
John Heinz	366	354	44	-322	-88
Johnson Lake	0	--	--	--	--
Julia Butler	4	0	6	2	50
Kakahaia	5	--	--	--	--
Kanuti	0	1	14	14	--
Karl Mundt	1	0	1	0	--
Kealia Pond	20	17	28	8	40

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Kellys Slough	0	0	--	--	--
Kenai	984	930	710	-274	-28
Kern	21	62	8	-13	-62
Key Cave	0	0	--	--	--
Key West	100	--	--	--	--
Kilauea Point	10	10	12	2	20
Kirwin	64	147	140	76	119
Klamath Forest	4	4	5	1	25
Kodiak	27	24	40	13	48
Kofa	13	31	166	153	1,176
Kootenai	29	13	17	-12	-41
Koyukuk	10	8	15	5	50
Kulm	26	4	27	1	4
Lacassine	58	0	647	589	1,016
Lacreek	0	0	25	25	--
Laguna Atascosa	43	562	590	547	1,272
Laguna Cartagena	0	0	0	0	--
Lake Alice	3	2	1	-2	-67
Lake Andes NWR	0	0	1	1	--
Lake George	4	4	5	1	25
Lake Ilo	13	17	15	2	15
Lake Isom	11	23	9	-2	-18
Lake Mason	0	0	--	--	--
Lake Nettie	0	2	0	0	--
Lake Ophelia	19	0	12	-7	-37
Lake Ubagog	15	10	8	-7	-37
Lake Woodruff	26	130	127	101	389
Lake Zahl	0	0	2	2	--
Lee Metcalf	42	79	71	113	269
Leopold	15	5	9	-6	-40
Lewis & Clark	19	0	--	--	--
Lido Beach	0	--	10	10	--
Litchfield	72	186	321	249	346
Little Pend	22	95	121	99	450
Little River	0	0	0	0	--
Long Lake NWR	10	10	65	55	550
Long Lake WMD	10	10	40	30	300
Lostwood NWR	1	5	13	12	1200
Lostwood WMD	0	3	10	10	--
Lousiana	8	17	--	--	--
Lower Hatchie	56	7	11	-45	-80
Lower Klamath	43	43	72	29	67
Lower Rio Grande	125	255	199	74	59
Lower Suwannee	286	315	205	-81	-28
MacKay Island	122	126	78	-44	-36
Madison	13	136	1,888	1,875	14,423
Malheur	125	290	142	17	14
Maple River	0	1	--	--	--

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Marin Island	0	1	2	2	--
Mark Twain	3	0	--	--	--
Mark Twain/Annada	8	1	4	-4	-50
Mark Twain/Brussels	8	2	1	-7	-88
Mark Twain/Wapello	6	8	--	--	--
Martin	1	7	7	6	600
Mason Neck	21	10	21	0	--
Mathews Brake	20	0	12	-8	-40
Matlacha Pass	0	0	--	--	--
Mattamuskeet	25	430	62	37	148
McKay Creek	0	7	12	12	--
McNary	17	12	13	-4	-24
Medicine Lake NWR	2	5	2	0	--
Merced	12	13	36	24	200
Meredosia	0	2	--	--	--
Merritt Island	857	783	1,659	802	94
Mid-Columbia River	0	--	4	4	--
Midway Atoll	15	--	16	+1	7
Mille Lacs	0	--	--	--	--
Mingo	71	40	315	244	344
Minidoka	0	1	--	--	--
Minnesota Valley	56	334	200	144	257
Minnesota Waterfowl	0	0	--	--	--
Missisquoi	9	8	20	+11	122
Mississippi Sandhill	18	18	11	-7	-39
Mississippi WMD	0	130	176	+176	--
Moapa Valley	0	0	0	0	--
Modoc	34	40	14	-20	-59
Monomoy	130	71	87	-43	-44
Monte Vista	40	35	37	-3	-8
Montezuma	5	0	1	-4	80
Moosehorn	13	12	28	15	115
Morgan Brake	46	27	68	22	48
Morris	25	36	42	17	68
Muleshoe	0	0	0	0	0
Muscatatuck	21	32	17	-4	-19
National Bison	480	531	495	15	3
National Elk	233	258	255	22	9
National Key Deer	140	--	229	89	64
Necedah	79	114	368	289	366
Nestucca Bay	0	0	--	--	--
Nine-Pipe	13	17	15	2	15
Ninigret	33	122	127	94	285
Nisqually	61	61	151	90	148
North Platte	9	16	13	4	44
NW Montana	19	26	31	12	63
Nowitna	0	0	0	0	--
Noxubee	231	448	424	193	84

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Ohio River Island	0	0	20	20	--
Okefenokee	154	82	247	93	60
Optima	7	5	5	-2	-29
Oregon Island	12	212	3	-9	-75
Ottawa	18	18	1	-17	-94
Ouray	36	20	25	-11	-31
Overflow	36	50	56	20	56
Oyster Bay	25	--	82	57	228
Ozark Cavefish	0	0	--	--	--
Ozark Plateau	14	5	8	-6	-43
Pablo	6	7	7	1	17
Pahrnagat	8	5	--	--	--
Panther Swamp	47	103	142	95	202
Parker River	174	332	3,365	3,191	1,834
Passage Key	2	0	--	--	--
Patuxent	212	311	302	90	43
Pea Island	23	--	--	--	--
Pearl Harbor	20	28	54	34	170
Pee Dee	6	--	--	--	--
Pelican Island	0	0	--	--	--
Petit Manan	28	11	25	-3	-11
Piedmont	411	172	103	-308	-75
Pierce	0	3	4	4	--
Pilot Knob	0	0	--	--	--
Pinckney	5	35	2	-3	-60
Pine Island	0	0	--	--	--
Pinellas	0	0	--	--	--
Pocasse	0	0	0	0	--
Pocosin	43	--	372	329	765
Pond Creek	140	30	95	-45	-32
Presquile	0	0	0	0	--
Pretty Rock	0	0	--	--	--
Prime Hook	114	60	188	74	65
Protection Island	15	15	60	45	300
Quivira	5	00	5	0	--
Rachel Carson	135	13	510	375	278
Rainwater Basin	18	17	43	25	139
Rappahannock	0	0	0	0	--
Red Rock Lakes	6	11	14	8	133
Reelfoot	16	16	14	-2	-13
Rice Lake	28	19	47	19	68
Ridgefield	43	18	23	-20	-47
Roanoke River	25	33	37	12	48
Rocky Mountain Arsenal	22	25	8	-14	-64
Ruby Lake	17	14	1	-16	-94
Sabine	102	254	39	-63	-62
Sachuest Point	18	120	--	--	--
Sacramento	8	23	31	23	288

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Sacramento River	1	2	8	7	700
Saddle Mountain	8	8	--	--	--
Salinas River	14	6	6	-8	-57
Salt Plains	22	28	10	-12	-55
Salton Sea	128	128	--	--	--
San Andres	2	2	4	2	100
San Bernard	23	32	23	0	--
San Bernardino	12	24	171	159	1,325
San Diego NWR	27	32	63	36	133
San Juan	10	10	10	0	--
San Luis	10	10	10	0	--
San Pablo	0	8	4	4	--
Sand Lake NWR	22	22	15	-7	-32
Sand Lake WMD	28	33	138	110	393
Sandy Point	8	10	7	-1	-13
Santee	0	43	84	84	--
Savannah	125	107	74	-51	-41
Sayville	4	--	25	21	525
Seatuck	25	--	50	25	100
Seedskadee	42	42	49	7	17
Selawik	4	4	7	3	75
Seney	12	3	--	--	--
Sequoyah	90	97	128	38	42
Sevilleta	15	0	0	-15	-100
Sheldon	1	6	3	2	200
Sheldon/Hart	4	--	18	14	350
Sherburne	140	150	304	164	117
Shiawassee	58	48	60	2	3
Sibley Lake	0	--	--	--	--
Siletz Bay	0	0	4	4	--
Slade	5	5	9	4	80
Squaw Creek	18	17	6	-12	-67
St. Catherine	6	50	480	474	7,900
St. Croix	6	2	25	19	317
St. Johns	3	3	--	--	--
St. Marks	77	173	97	20	26
St. Vincent	4	5	5	1	25
Steigerwald	0	11	5	5	--
Stewart McKinney	121	45	355	234	193
Stewart Lake	0	0	0	0	--
Stillwater	30	25	27	-3	-10
Stone Lakes	3	6	6	3	100
Sullys	102	240	--	--	--
Sunburst Lake	4	4	5	1	25
Sunkhaze	5	5	5	0	--
Supawna	24	26	24	0	--
Sutter	5	8	12	7	140
Swan Lake	15	12	16	1	7

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Swanquarter	0	55	0	0	--
Sweetwater	5	5	23	18	360
Tallahatchie	0	80	--	--	--
Tamarac	20	10	13	-7	-35
Target Rock	31	--	135	104	336
Ten Thousand Island	0	17	53	53	--
Tennessee	229	229	220	-9	-4
Tensas River	85	85	158	73	86
Tewaukon NWR	0	7	19	19	--
Tewaukon WMD	1	--	6	5	500
Texas Point	24	25	6	-18	-75
Three Arch Rocks	34	0	4	-30	-88
Tijuana Slough	35	35	89	54	154
Tishomingo	9	26	32	23	256
Togiak	84	84	60	-24	-29
Tomahawk	0	--	--	--	--
Toppenish	0	6	9	9	--
Trempealeau	1	0	9	8	800
Trinity River	5	5	6	1	20
Trustom Pond	57	325	--	--	--
Tualatin River	1	2	--	--	--
Tule Lake	24	24	41	17	71
Turnbull	1	10	10	9	900
Tybee	1	1	--	--	--
UI Bend	0	0	--	--	--
Umatilla	23	39	13	-10	-44
Union Slough	5	4	18	13	260
Upper Klamath	0	0	4	4	--
Upper Mississippi/LaCrosse	18	16	32	14	78
Upper Mississippi/McGregor	117	72	--	--	--
Upper Mississippi/Savanna	55	40	--	--	--
Upper Mississippi/Winona	33	27	--	--	--
Upper Mississippi W&FR	--	72	--	--	--
Upper Ouachita	18	16	--	--	--
Upper Souris	48	133	138	90	188
Valentine	19	20	18	-1	-5
Valley City	92	44	16	-76	-83
Wallkill River	20	17	6	-14	-70
Wallops Island	0	0	0	0	--
Walnut Creek	20	--	--	--	--
Wapanocca	10	6	8	-2	-20
War Horse	0	0	--	--	--
Washita	35	16	20	-15	-43
Wassaw	6	13	7	1	17
Watercress Darter	0	0	0	0	--
Waubay NWR	0	0	10	10	--
Waubay WMD	48	59	10	-38	-79
Wertheim	300	460	--	--	--

REFUGE LAW ENFORCEMENT ACTIVITY 1997-1999					
	1997	1998	1999	Change Number	Change Percent
West Sister Island	0	0	--	--	--
Wheeler	249	270	520	271	109
White Lake	0	0	0	0	--
White River	104	100	185	81	78
Wichita Mountains	856	2,885	2,029	1,173	137
Willapa	10	0	1	-9	-90
William Finley	0	--	10	10	--
Windom	0	5	--	--	--
Wolf Island	1	9	0	-1	100
Yazoo	97	26	56	-41	-42
Yukon Delta	4	10	20	16	400
Yukon Flats	<u>4</u>	<u>32</u>	<u>11</u>	<u>7</u>	<u>175</u>
	24,472	28,778	33,175	8,703	

Appendix 2

LAW ENFORCEMENT STAFF DAYS 1997-1999

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Ace Basin	85	85	95	10	12
Agassiz	80	71	63	-17	-21
Alamosa	69	14	4	-65	-94
Alaska Peninsula	117	19	28	-89	-76
Alligator River	85	16	259	174	205
Amaganset	5	--	3	-2	-40
Anahuac	150	126	130	-20	-13
Ankeny	13	20	20	7	54
Antioch Dunes	5	17	18	13	260
Appert Lake	5	5	6	1	20
Aransas	171	158	45	-126	-74
Arapaho	43	13	42	-1	-2
Archie Carr	5	6	--	--	--
Arctic	195	116	132	-63	-32
Arrowwood NWR	24	47	159	135	563
Arrowwood WMD	28	35	86	58	207
Arthur Marshall	521	839	831	310	60
Ash Meadows	31	30	62	31	100
Atchafalaya	8	2	--	--	--
Attwater	25	25	27	2	8
Audubon NWR	26	13	30	4	15
Audubon WMD	32	33	400	368	1,200
Back Bay	170	168	223	53	31
Bald Knob	159	140	--	--	--
Brandon Marsh	4	0	--	--	--
Banks Lake	53	16	26	-27	-50
Baskett Slough	22	25	20	-2	-9
Bayou Cocodrie	82	100	152	70	85
Bayou Sauvage	168	118	--	--	--
Bear Lake	17	54	104	87	511
Bear River	244	305	460	216	89
Bear Valley	8	4	4	-4	-50
Becharof	78	39	11	-67	-86
Benton Lake NWR	80	99	130	40	44
Benton Lake WMD	64	66	60	-4	-6
Big Boggy	10	10	10	0	--
Big Branch	208	168	--	--	--
Big Lake	59	8	10	-49	-83
Big Muddy	30	35	0	-30	-100
Big Stone NWR	9	6	68	59	655
Big Stone WMD	1	--	3	2	200
Big Williams	49	5	30	-19	38
Bitter Lake	40	38	68	28	70
Blackbeard	88	238	99	11	13
Blackwater	155	125	101	-54	-35
Blowing Wind	3	13	4	1	33

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Bogue Chitto	122	93	--	--	--
Bombay Hook	148	105	296	148	100
Bon Secour	94	41	30	-64	-68
Bond Swamp	82	69	41	-41	-50
Bone Hill	4	1	2	-2	-50
Bowdoin NWR	3	--	50	47	1,566
Bowdoin WMD	1	--	10	9	900
Boyer Chute	355	290	134	-221	-62
Brazoria	85	100	85	0	--
Breton	46	86	--	--	--
Browns Park	62	54	67	5	8
Buenos Aires	95	--	158	63	66
Buffalo Lake	47	68	35	-12	-26
Butte Sink	3	3	3	0	--
Cabeza Prieta	244	340	509	365	109
Cabo Rojo	5	13	35	30	600
Cache River	473	379	540	67	14
Caloosahatchee	3	3	--	--	--
Camas	21	30	91	70	333
Cameron Prarie	85	44	50	-35	-41
Cameron Billsbach	1	--	--	--	--
Canaan Valley	5	6	20	15	300
Canfield Lake	3	3	5	2	66
Cape Meares	6	6	7	1	17
Cape Romain	124	138	169	45	36
Carlton Pond	2	5	12	10	500
Carolina Sandhills	57	109	242	185	325
Catahoula	119	78	70	-49	-41
Cedar Island	3	3	10	7	233
Cedar Keys	33	35	--	--	--
Cedar Point	11	8	25	14	127
Charles Russell NWR	125	137	280	155	124
Charles Russell WMD	1	1	--	--	--
Chase Lake NWR	7	2	3	-4	-57
Chase Lake WMD	90	122	77	-13	-14
Chassahowitzka	256	173	500	244	95
Chataugua	6	31	0	-6	100
Chickasaw	152	51	100	-52	-34
Chincoteague	674	823	1,073	399	59
Choctaw	98	110	102	4	4
Cibola	38	68	120	82	215
Clarence Canyon	40	26	--	--	--
Clear Lake	35	22	23	-12	-34
Cold Springs	35	20	20	-15	-43
Columbia	41	36	54	13	32
Colusa	38	38	35	-3	-8
Conboy Lake	35	27	27	-8	-23
Conscience Point	8	--	10	2	25

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Crab Orchard	1,041	481	1,050	9	9
Crane Meadows	30	20	15	-15	-50
Crescent Lake	98	80	80	-18	-18
Crocodile Lake	29	--	--	--	--
Crosby	74	103	250	176	238
Cross Creek	60	--	67	7	12
Crystal River	204	183	--	--	--
Culebra	64	79	90	26	41
Currituck	122	67	78	-44	-36
Cypress Creek	17	146	54	37	218
D'Arbonne	69	89	--	--	--
Dahomey	190	36	--	--	--
Dakota Lake	15	11	5	-10	-66
Deep Fork	74	200	279	205	277
Deer Flat	70	70	50	-20	-29
Delevan	25	25	30	5	20
Delta	104	236	--	--	--
Des Lacs	76	27	86	10	13
Desert National	27	51	33	6	22
Desoto	570	532	388	-182	-32
Detroit Lakes	459	143	259	-200	-44
Devils Lake	453	633	863	410	91
Don Edwards	505	475	671	166	33
Driftless	15	0	76	61	406
Dungeness	126	110	105	-21	-17
Eastern Neck	35	91	173	138	394
Eastern Shore	7	33	67	60	857
Edwin Forsythe	500	500	918	418	84
Egmont Key	61	62	--	--	--
Elizabeth Morton	19	--	25	6	32
Ellicott Slough	4	2	--	--	--
Emiquon	5	8	--	--	--
Erie	67	44	44	-23	-34
Eufaula	73	109	108	35	48
Farallon	0	12	1	1	--
Felsenthal	100	160	420	320	320
Fergus Falls	235	415	361	126	54
Fern Cave	3	2	4	1	33
Fish Springs	118	96	185	67	58
Flint Hills	15	19	65	50	333
Florence Lake	3	3	5	2	66
Florida Panther	90	101	410	320	355
Ft. Niobrara	34	75	150	116	341
Fox River	2	5	16	14	700
Franz Lake	0	3	2	2	--
Grand Cote	62	--	73	11	18
Grays Harbor	4	4	4	0	--
Great Bay	8	20	51	43	538

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Great Dismal Swamp	90	167	60	-30	-33
Great Meadows	37	18	201	164	443
Great Swamp	78	108	180	102	131
Great White Heron	47	--	--	--	--
Grolla	11	11	--	--	--
Guam	320	225	260	-60	-19
Hagerman	76	31	15	-61	-80
Hailstone	1	1	--	--	--
Hakalau Forest	6	8	8	2	33
Halfbreed Lake	1	1	--	--	--
Hamden Slough	21	23	23	2	10
Hanalei	42	25	38	-4	-10
Harris Neck	198	90	155	-43	-22
Hart Mountain	52	23	30	-22	-42
Hatchie	62	15	90	28	45
Havasu	60	50	164	104	173
Hawaiian Island Complex	22	--	4	-18	-82
Hawaiian Island NWR	7	12	140	133	1,900
Hillside	52	77	30	-22	-42
Hobart Lake	1	--	1	0	--
Hobe Sound	124	322	234	110	89
Holla Bend	200	200	125	-75	-38
Horicon	45	40	36	-9	-20
Huleia	13	5	5	-8	-62
Humbolt Bay	17	52	52	35	206
Huron NWR	1	60	--	--	--
Huron WMD	89	3	55	-34	-38
Hutchinson Lake	3	1	7	4	133
Imperial	317	317	379	62	20
Innoko	93	53	93	0	--
Iowa	2	17	11	9	450
Iroquois	29	19	103	74	255
Island Bay	3	3	--	--	--
Izembek	35	50	65	30	86
J. Clark Salyer NWR	34	27	91	57	23
J. Clark Salyer WMD	131	163	170	39	30
J. N. Ding Darling	272	250	229	-43	-16
James Campbell	23	41	45	22	96
James River	90	60	12	-78	-87
John Hay	5	0	4	-1	-20
John Heinz	182	202	400	218	120
Johnson Lake	4	--	1	-3	-75
Julia Butler	5	17	10	5	100
Kakahaia	9	--	--	--	--
Kanuti	39	46	39	0	--
Karl Mundt	7	12	6	-1	-14
Kealia Pond	40	33	14	-26	-65
Kellys Slough	5	4	3	-2	-40

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Kenai	784	954	1,277	493	63
Kern	101	59	46	-55	-55
Key Cave	5	9	--	--	--
Key West	130	--	--	--	--
Kilauea Point	50	25	35	-15	-30
Kirwin	131	110	275	144	110
Klamath Forest	61	52	48	-13	-21
Kodiak	276	288	442	166	60
Kofa	264	178	229	-35	-13
Kootenai	98	62	131	33	34
Koyukuk	36	24	20	-16	-44
Kulm	167	144	133	-34	-20
Lacassine	300	274	300	0	--
Lacreek	61	37	28	-33	-54
Laguna Atascosa	6	16	299	293	+4,883
Laguna Cartagena	5	11	23	18	360
Lake Alice	20	215	3	-17	-85
Lake Andes NWR	22	42	111	89	404
Lake George	89	90	137	48	54
Lake Ilo	32	35	55	23	72
Lake Isom	24	24	25	1	4
Lake Mason	1	1	--	--	--
Lake Nettie	6	9	15	9	150
Lake Ophelia	70	112	111	41	59
Lake Ubagog	20	24	61	41	205
Lake Woodruff	100	100	180	80	80
Lake Zahl	5	1	59	54	1,080
Lee Metcalf	104	110	155	51	49
Leopold	50	53	89	39	78
Lewis & Clark	24	2	--	--	--
Lido Beach	4	--	5	1	25
Litchfield	240	291	250	10	4
Little Pend	59	98	192	133	225
Little River	181	181	105	-76	-42
Long Lake NWR	35	35	34	-1	-3
Long Lake WMD	60	60	54	-6	-10
Lostwood NWR	15	11	96	81	540
Lostwood WMD	17	18	50	33	194
Lousiana	28	90	--	--	--
Lower Hatchie	74	131	131	57	77
Lower Klamath	246	239	192	-54	-22
Lower Rio Grande	422	579	405	-17	-4
Lower Suwannee	355	350	338	-17	-5
Mackay Island	201	178	187	-14	-7
Madison	242	209	275	33	14
Malheur	377	336	289	-88	-23
Maple River	8	3	2	-6	-75
Marin Island	5	4	4	-1	-20

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Mark Twain	30	8	--	--	--
Mark Twain/Annada	45	30	60	15	33
Mark Twain/Brussels	97	64	41	-56	-58
Mark Twain/Wapello	75	39	--	--	--
Martin	20	32	32	12	60
Mason Neck	63	40	48	-15	-24
Mathews Brake	7	8	8	1	14
Matlacha Pass	3	3	--	--	--
Mattamuskeet	51	240	315	264	518
McKay Creek	15	20	25	10	67
McNary	40	30	55	15	38
Medicine Lake NWR	78	62	58	-20	-26
Medicine Lake WMD	31	30	48	17	55
Merced	28	167	317	289	1,032
Meredosia	6	7	--	--	--
Merritt Island	425	545	422	-3	-.7
Mid-Columbia River	0	--	3	3	--
Midway Atoll	58	--	120	62	107
Mille Lacs	2	--	--	--	--
Mingo	113	165	145	32	28
Minidoka	70	87	78	8	11
Minnesota Valley	60	190	480	420	700
Minnesota Waterfowl	6	6	--	--	--
Missisquoi	80	38	80	0	--
Mississippi Sandhill	40	50	40	0	--
Mississippi WMD	255	38	489	234	92
Moapa Valley	4	4	--	--	--
Modoc	47	38	24	-23	-49
Monomoy	174	131	148	-26	-15
Monte Vista	11	20	20	9	82
Montezuma	40	32	5	-35	-88
Moosehorn	30	12	18	-12	-40
Morgan Brake	40	57	77	37	93
Morris	139	289	179	40	29
Muleshoe	44	44	24	-20	-46
Muscatatuck	50	101	73	23	46
National Bison	90	102	140	50	56
National Elk	226	205	150	-76	-37
National Key Deer	421	--	600	179	43
Necedah	57	93	75	18	32
Nestucca Bay	10	10	7	-3	-30
Nine-Pipe	15	19	13	-2	-13
Ninigret	118	106	170	52	44
Nisqually	33	33	103	70	212
North Platte	88	88	20	-68	-77
NW Montana	30	40	30	0	--
Nowitna	9	17	21	12	133
Noxubee	271	271	305	34	13

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Ohio River Island	128	204	123	-5	-4
Okefenokee	468	561	600	132	28
Optima	3	3	5	2	67
Oregon Island	6	6	10	4	67
Ottawa	58	188	122	64	110
Ouray	28	45	50	22	79
Overflow	146	35	23	-123	-84
Oyster Bay	13	--	10	-3	-23
Ozark Cavefish	3	3	--	--	--
Ozark Plateau	28	16	20	-8	-29
Pablo	8	11	10	2	25
Pahrnagat	25	13	--	--	--
Panther Swamp	79	123	0	-79	--
Parker River	313	592	538	225	72
Passage Key	25	25	--	--	--
Patuxent	550	470	535	-15	-3
Pea Island	9	--	--	--	--
Pearl Harbor	23	42	4	18	74
Pee Dee	18	--	--	--	--
Pelican Island	10	13	--	--	--
Petit Manan	51	69	86	35	69
Piedmont	323	318	310	-13	-4
Pierce	0	5	6	6	--
Pilot Knob	2	2	--	--	--
Pinckney	40	14	50	10	25
Pine Island	3	3	--	--	--
Pinellas	22	17	--	--	--
Pocasse	2	1	1	-1	-50
Pocosin	55	--	120	65	118
Pond Creek	254	75	75	-179	-70
Presquile	15	30	15	0	--
Pretty Rock	1	2	--	--	--
Prime Hook	60	60	100	40	67
Protection Island	7	7	11	4	57
Quivira	182	--	145	-37	-20
Rachel Carson	82	31	177	95	116
Rainwater Basin	19	51	39	20	105
Rappahannock	15	30	7	-8	-53
Red Rock Lakes	43	100	75	32	74
Reelfoot	110	62	118	8	7
Rice Lake	110	62	118	8	7
Ridgefield	77	43	155	78	101
Roanoke River	366	257	310	-56	-15
Rocky Mountain Arsenal	130	651	2,103	1,973	1,518
Ruby Lake	165	184	38	-127	-77
Sabine	145	221	152	7	5
Sachuest Point	36	32	--	--	--
Sacramento	25	25	30	5	20

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Sacramento River	17	19	50	33	194
Saddle Mountain	5	5	--	--	--
Salinas River	53	27	28	-25	-47
Salt Plains	59	113	140	81	137
Salton Sea	177	157	--	--	--
San Andres	20	5	20	0	--
San Bernard	80	80	80	0	--
San Bernardino	64	107	354	290	453
San Diego NWR	43	141	204	161	374
San Juan	1	1	8	7	--
San Luis	55	417	379	324	589
San Pablo	15	33	30	15	100
Sand Lake NWR	96	94	97	1	1
Sand Lake WMD	105	91	150	45	43
Sandy Point	62	275	266	204	329
Santee	4	226	156	152	3,800
Savannah	352	554	263	-89	-25
Sayville	10	--	5	-5	-50
Seatuck	14	--	19	5	36
Seedskadee	29	29	141	112	386
Selawik	98	128	121	23	24
Seney	63	18	45	-18	-29
Sequoyah	152	101	190	38	25
Sevilleta	204	106	153	-51	-25
Sheldon	45	51	20	-25	-56
Sheldon/Hart	7	--	70	63	900
Sherburne	50	50	40	10	-20
Shiawassee	87	75	147	60	69
Sibley Lake	1	--	--	--	--
Siletz Bay	6	6	2	-4	-67
Slade	4	4	10	6	150
Squaw Creek	30	26	17	-13	-43
St. Catherine	176	158	250	74	42
St. Croix	34	13	85	51	150
St. Johns	15	19	--	--	--
St. Marks	281	849	279	-2	.7
St. Vincent	83	75	82	-1	-1.2
Steigerwald	7	6	2	-5	-71
Stewart McKinney	63	34	71	8	13
Stewart Lake	1	2	9	8	800
Stillwater	84	48	158	74	88
Stone Lakes	3	8	10	7	233
Sullys	75	65	48	-27	-36
Sunburst Lake	3	3	5	2	67
Sunkhaze	25	19	73	48	192
Supawna	73	77	55	-18	-25
Sutter	25	25	30	5	20
Swan Lake	3	6	5	2	67

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
Swanquarter	3	10	10	7	233
Sweetwater	6	10	57	51	850
Tallahatchie	203	41	--	--	--
Tamarac	57	84	142	85	149
Target Rock	18	--	25	7	39
Ten Thousand Island	30	199	260	230	766
Tennessee	359	359	407	48	13
Tensas River	290	290	265	-25	-8
Tewaukon NWR	42	151	241	199	474
Tewaukon WMD	37	--	--	--	--
Texas Point	14	13	45	31	221
Three Arch Rocks	3	6	5	2	67
Tijuana Slough	43	32	145	102	237
Tishomingo	137	171	160	23	17
Togiak	111	272	135	24	22
Tomahawk	2	--	1	-1	-50
Toppenish	30	20	21	-9	-30
Trempealeau	36	27	19	-17	-47
Trinity River	35	35	50	15	43
Trustom Pond	120	108	--	--	--
Tualatin River	5	20	--	--	--
Tule Lake	176	273	245	69	39
Turnbull	16	71	45	29	181
Tybee	1	8	--	--	--
UI Bend	1	1	--	--	--
Umatilla	40	40	44	4	10
Union Slough	40	51	76	36	90
Upper Klamath	9	9	17	8	89
Upper Mississippi/LaCrosse	197	206	20	-177	-90
Upper Mississippi/McGregor	160	162	--	--	--
Upper Mississippi/Savanna	83	120	--	--	--
Upper Mississippi/Winona	170	138	--	--	--
Upper Mississippi W&FR	20	253	--	--	--
Upper Ouachita	323	320	--	--	--
Upper Souris	160	145	235	75	47
Valentine	91	79	50	-41	-45
Valley City	148	146	175	27	18
Walkkill River	145	154	56	-89	-61
Wallops Island	5	5	8	3	60
Walnut Creek	55	--	--	--	--
Wapanocca	41	50	61	20	49
War Horse	1	1	--	--	--
Washita	93	99	123	30	32
Wassaw	112	59	104	-8	-7
Watercress Darter	3	2	5	2	67
Waubay NWR	26	130	63	37	142
Waubay WMD	141	161	135	-6	-4
Wertheim	41	80	--	--	--

LAW ENFORCEMENT STAFF DAYS 1997-1999					
	1997	1998	1999	Change Number	Change Percent
West Sister Island	1	1	1	--	--
Wheeler	420	526	410	-10	-2
White Lake	1	2	4	3	300
White River	480	281	319	-161	-34
Wichita Mountains	780	884	830	50	6
Willapa	51	19	12	-39	-76
William Finley	11	--	20	9	82
Windom	35	20	254	219	625
Wolf Island	5	36	27	22	440
Yazoo	296	393	393	97	328
Yukon Delta	35	196	120	85	243
Yukon Flats	48	64	40	-8	-17
TOTALS	39,129	41,276	48,842	9,713	24.8