

**Final Report on the Bureau of
Alcohol, Tobacco and Firearms'
Implementation of the Youth Crime
Gun Interdiction Initiative**

OIG-00-119

August 21, 2000

This report has been reviewed for public dissemination by the Office of Counsel to the Inspector General. Information requiring protection from public dissemination has been redacted from this report in accordance with the Freedom of Information Act, 5 U.S.C. section 552.



Office of Inspector General

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DEPARTMENT OF THE TREASURY

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MEMORANDUM FOR BRADLEY A. BUCKLES, DIRECTOR
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS

FROM: Dennis S. Schindel *Dennis Schindel*
Assistant Inspector General for Audit

SUBJECT: Final Audit Report on the Bureau of Alcohol,
Tobacco and Firearms' Implementation of the Youth
Crime Gun Interdiction Initiative

This memorandum transmits our final audit report on our review of Bureau of Alcohol, Tobacco and Firearms (ATF) field office implementation and performance measurement of the Youth Crime Gun Interdiction Initiative (YCGII). The overall objective of this audit was to determine whether ATF effectively implemented YCGII in its field offices and whether participating cities implemented activities to effectively identify and investigate firearms traffickers who illegally supply firearms to youths. Although ATF field offices appointed YCGII coordinators and implemented memorandums of understanding with participating cities, we found that activities varied significantly. Our final report made nine recommendations that will help ATF improve YCGII. In summary, ATF needed to:

- Update guidance to the ATF field offices and develop a formal methodology for allocating agent resources to the YCGII program;
- Provide additional guidance to cities as how to most effectively implement a YCGII program. ATF should continue to strengthen efforts to advise police departments of available ATF analytical tools to help them develop effective firearm trafficking investigation strategies; and
- Develop better performance indicators and a data verification process to measure YCGII's impact on violent youth crime rates.

In its response, ATF agreed with our recommendations, and has initiated and planned actions to address the recommendations.

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ATF's comments have been incorporated into the report and are included in their entirety as an appendix to the report.

Please be advised that this report is the last of three OIG reports on ATF activities that are associated with YGCII. Our two prior reports discussed weaknesses in ATF's: (1) procedures and controls over funds designated for YCGII; and (2) conversion of the Firearms Tracing System, which is used by ATF to trace recovered crime guns.¹ Collectively, we believe that the findings in the three reports constitute a material weakness in ATF's management controls over YCGII as defined in Office of Management and Budget Circular A-123, *Management Accountability and Control*. Accordingly, ATF management should consider reporting these issues as a material weakness under the Department of the Treasury's Federal Managers' Financial Integrity Act process.

We appreciate the courtesies and cooperation provided to our auditors during our review. If you wish to discuss this report, you may contact me at (202) 927-5400, or a member of your staff may contact Roberta N. Rickey, Director, Program Audit at (312) 886-6300.

Attachment

cc: James E. Johnson, Under Secretary of the Treasury
for Enforcement

Richard Hankinson, Assistant Director
Office of Inspection
Bureau of Alcohol, Tobacco and Firearms

¹ *Final Audit Report on the Bureau of Alcohol, Tobacco and Firearms' Expenditures for the Youth Crime Gun Interdiction Initiative* (OIG-00-087; issued May 30, 2000) and *Final Report on the Bureau of Alcohol, Tobacco and Firearms Conversion of the Firearms Tracing System* (OIG-00-093; issued June 16, 2000)

EXECUTIVE DIGEST

Overview

In 1996, the Bureau of Alcohol, Tobacco and Firearms (ATF), at the direction of the President, initiated the Youth Crime Gun Interdiction Initiative (YCGII) to strengthen enforcement efforts against firearms traffickers who supply firearms to youths. At the time YCGII began, homicides committed by young people with firearms had nearly tripled since 1985. Seventeen cities were initially included in the program and were to use ATF's Firearms Tracing System (FTS) to trace every firearm recovered in a crime. This trace information provides ATF and the other law enforcement agencies with crucial investigative leads. ATF and these law enforcement agencies are to work jointly using these leads to develop investigative and prosecutive strategies that target gun traffickers supplying firearms to youths.

The Office of Inspector General (OIG) included this review in its *Audit, Evaluations, and Information Technology Plan for FY 1999* because the Administration and Congress have placed a high priority on reducing violent crime committed by young people with firearms. This report is the last of three OIG reports on ATF activities that are associated with YCGII and discusses the status of ATF's implementation of YCGII at ATF field offices and at the police departments in the cities initially selected for YCGII. In order for ATF to have an impact on youth crime, it must have effective operations in ATF field offices and in the local police departments. Currently, YCGII is operating in 38 cities and receives funding of \$51 million. It will be expanded to 50 cities in Fiscal Year (FY) 2001 with funding of \$70 million and to 75 cities within 4 years.

Objectives, Scope and Methodology

The overall objective of this review was to determine whether ATF field offices and participating cities have effectively implemented YCGII. Our specific objectives were to determine whether: (1) ATF's field offices have implemented YCGII in accordance with Headquarters' guidance, (2) participating cities have submitted trace requests for all firearms recovered in crimes and developed strategies to investigate illegal trafficking of firearms to youths, and (3) ATF accomplishment reports were accurate and show YCGII's impact on eliminating the illegal flow of firearms to youths.

To accomplish our review, we conducted fieldwork at ATF Headquarters where we evaluated procedures and discussed YCGII activities with ATF officials responsible for administering the program. We also visited four

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ATF field offices and police departments initially selected for YCGII. At these locations, we reviewed records and procedures and interviewed ATF and police department officials. For those cities initially selected for YCGII that the OIG did not visit, we interviewed local ATF and police department personnel about their efforts to implement the program. The scope of this review covered YCGII since its inception through FY 1999.

Audit Results

ATF field offices responsible for implementing YCGII in the 17 cities have not consistently performed important program activities prescribed in Headquarters YCGII guidance. Consequently, certain field offices were not providing cities with all of the assistance necessary to help ensure that the cities submit trace requests for all firearms recovered in crimes. Field offices have not always performed these activities, in part, because YCGII coordinators either were unaware of existing guidance, or the existing guidance did not sufficiently describe how to implement YCGII activities. Additionally, activities were not performed because YCGII coordinators had other responsibilities. Also, ATF has not developed a method to ensure that appropriate special agent resources were available in field offices to conduct YCGII-related activities.

Second, not all police departments submitted trace requests on every firearm recovered. Additionally, certain police department YCGII representatives were either not familiar with, or did not avail themselves of ATF's analytical tools to help target firearms traffickers for investigation. As a result, YCGII programs in certain cities may not be identifying the most significant indicators of illegal firearms trafficking for investigation. Not all ATF field offices regularly communicated with the cities to verify that trace requests were submitted for all firearms, and to determine the resources needed to ensure the cities' active YCGII participation. Police department representatives also explained that other analytical information was not always provided or was not easily accessible. ATF's current Statement of Participants requires cities to submit trace requests on all recovered firearms and to develop strategies based upon analytical information received from ATF.

Additionally, ATF has not developed specific performance measures that show the actual impact on youth violent crime rates in cities as a result of participating in YCGII. ATF has not developed a formal process to verify certain statistics that have been reported to Congress about the program's results. Consequently, reported statistical information may not be accurate. The Government Performance and Results Act of 1993

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(Results Act) requires performance measurements and data which are results oriented. Agencies need to have a good data verification process to ensure accurate reporting of data. With these types of measures and with accurate data, ATF and other decision-makers will be able to better determine the actual impact that YCGII has had on youth crime rates in participating cities. ATF officials acknowledge that better measures of YCGII's program impact are needed.

Recommendations and Management Response

Our draft report, issued on June 9, 2000, made nine recommendations that will enhance ATF's administration and expansion of YCGII at ATF field offices and selected cities. ATF agreed with and will implement all recommendations. As a result, ATF will:

- Update guidance to the ATF field offices and develop a formal methodology for allocating agent resources to the YCGII program;
- Provide additional guidance to cities as how to most effectively implement a YCGII program. ATF will continue to strengthen efforts to advise police departments of available ATF analytical tools to help them develop effective firearm trafficking investigation strategies; and
- Develop better performance indicators and a data verification process to measure YCGII's impact on violent youth crime rates.

The details of ATF's responses and actions initiated to address our findings and recommendations are contained in the body of this report. We believe that implementation of these recommendations will help strengthen ATF's administration and expansion of YCGII.

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BACKGROUND

In July 1996, ATF, at the direction of the President, announced YCGII as a program to strengthen enforcement efforts against crime gun traffickers who supply firearms to youths. At the time YCGII began, homicides committed by young people with firearms had nearly tripled since 1985, and other types of gun-related violence were on the rise. The illegal sources of the firearms used to commit these crimes were intrastate and interstate trafficking, stolen firearms trafficking, and thefts from Federal Firearms Licensees (FFL).

Upon implementation, YCGII became a focused component of ATF's Illegal Firearms Trafficking Project which seeks to identify the most prolific illegal traffickers of firearms to violent criminals as well as youths. YCGII was implemented in 17 pilot cities and was expanded to 27 cities in FY 1999 and to 38 cities in FY 2000. In order to identify and stop those illegal sources of firearms to youths in these cities, YCGII has the following primary goals:

- To ensure that every recovered crime-gun in each city is traced through ATF's National Tracing Center (NTC).
- To conduct analyses on the resulting crime gun information to determine the community-wide patterns relating to recovered firearms.
- To produce a publication of the crime gun analysis for use by Federal, State, and local law enforcement in the YCGII cities to develop collaborative strategies and enforcement activities against illegal sources of crime guns.

To help achieve these goals, the NTC works with law enforcement agencies, firearm manufacturers, and FFLs to trace and determine the manufacturing and initial sale history of firearms recovered by Federal, State, and local law enforcement agencies. The trace information developed by the NTC provides ATF and the other law enforcement agencies with crucial leads against firearms traffickers. The following summarizes the number of cities in the program and the total number of traces analyzed by the NTC:

BACKGROUND

TABLE 1
Trace Analysis for YCGII Cities

PERIOD	PARTICIPATING CITIES	NUMBER OF TRACES
July 1996 - April 1997 ¹	17	37,589
August 1997 - July 1998	27	76,260
August 1998 - June 1999	38	96,474

Source: ATF's Crime Gun Trace Analysis Reports

Effective submission of trace requests and other activities necessary to implement YCGII rely on a collaborative effort between ATF and the cities. To help ensure YCGII's success, ATF field offices and cities were to perform activities necessary to: (a) develop and exchange information relating to the unlawful acquisition, illegal trafficking, and criminal misuse of firearms; (b) ensure that all recovered firearms are traced through the NTC; (c) ensure that ATF is the central recipient of all firearms-related information and that this information is then analyzed, shared, and used in furtherance of strategic enforcement objectives; and (d) ensure ATF and police department personnel cooperate in the conduct of joint firearms trafficking investigations when possible.

To help accomplish these goals, ATF field offices usually appointed a special agent to serve as a YCGII coordinator with the police department on various program activities. Additionally, ATF field office division directors were to meet with city officials to discuss the program and the need for the city to submit complete trace information on firearms recovered in crimes. Cities, likewise, were expected to provide the necessary support to ensure that all recovered firearms were traced, and to assign personnel to help: (a) refer non-Federal trafficking cases derived from ATF's On-Line LEAD, an automated illegal firearms trafficking information system, to state and local prosecutors; (b) facilitate the study of the illicit gun markets; and (c) work with ATF to develop new law enforcement strategies to address illicit firearms markets.

¹ This report covered only a 10-month period.

OBJECTIVES, SCOPE AND METHODOLOGY

The OIG included this review in its *Audit, Evaluations, and Information Technology Plan for FY 1999*, because reducing violent crime committed by young people with firearms has been a concern to the Administration and to Congress. This review is the last of three reviews on ATF activities that are associated with YCGII. The other two reviews focused on ATF's efforts to (a) redesign its FTS and (b) establish procedures and controls over YCGII funds and expenditures.

Our overall objective was to determine whether ATF effectively implemented YCGII in its field offices and whether participating cities effectively implemented activities to identify and investigate firearms traffickers who illegally supply firearms to youths. Our specific objectives were to determine whether:

- Field offices have implemented YCGII in accordance with Headquarters guidance;
- Participating cities have carried out requirements in Statements of Participants to submit trace requests on all recovered firearms and develop effective strategies to investigate illegal trafficking of firearms to youths; and
- ATF accurately reported YCGII accomplishments and whether the accomplishments show that YCGII was helping to eliminate the illegal flow of firearms to youths.

Our review generally covered YCGII activities at ATF field offices and cities participating in YCGII from July 1996 through September 1999. To accomplish our review, we conducted work at ATF Headquarters where we interviewed officials and other employees in the: (1) Office of Firearms, Explosives and Arson (FEA); (2) Office of Management; and (3) Office of Inspection (OI). We reviewed policies, procedures, and records related to: (a) the implementation of YCGII in the selected field offices and cities, (b) recording of accomplishments and other statistical information, and (c) the process by which ATF selects cities for the program.

We also visited ATF field offices in Atlanta, Chicago, New York City, and St. Louis, where we interviewed ATF supervisors, special agents, and local law enforcement personnel. We reviewed ATF and police department records to show that firearms were traced, analyses were performed, strategies developed, and investigations initiated at traffickers supplying firearms illegally to youths. Finally, we analyzed supporting

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documentation to show that accomplishments were accurately reported and that YCGII was having an impact on traffickers. In addition to visits to the field offices selected, we used structured interviews to gather additional information from ATF field offices and police departments we did not visit. Our interviews obtained information about how the program worked at these locations including procedures for submitting firearms trace requests and developing strategies using analytical data supplied by the NTC. We also attended the National YCGII Conference in November 1999 held in Shepardstown, West Virginia.

Our audit work was performed from July 1999 through January 2000. Our audit was conducted in accordance with *Government Auditing Standards*, issued by the Comptroller General of the United States, and included such audit tests that were deemed necessary.

AUDIT RESULTS

Finding 1. Field Offices Need Additional Guidance

ATF field offices responsible for implementing YCGII in the 17 cities initially selected for the program have not consistently performed important program activities. Consequently, not all field offices are providing cities with the assistance necessary to help ensure that cities submit trace requests for all firearms recovered in crimes and target firearms trafficking to youth for investigation. Headquarters guidance describes activities that each field office should perform to make sure such actions are taken. Field offices have not always performed these activities, in part, because YCGII coordinators either were unaware of existing guidance, or the existing guidance did not sufficiently describe how to implement YCGII activities. Additionally, activities were not always performed because YCGII coordinators had other responsibilities. Also, ATF has not developed a method to ensure special agent resources in field offices are appropriate to conduct YCGII-related activities.

Recommendations

The ATF Director should ensure that:

1. Existing guidance is updated to include a model of best practices that can be used as a guide by YCGII coordinators.
2. A formal methodology is developed and records maintained for allocating special agent resources to the YCGII program and where to place the YCGII coordinator in each field office's organizational structure.
3. ATF field offices appropriately implement the revised guidance and special agent resource allocation methodology.

Management Response and OIG Comments

The ATF Director agreed with all the recommendations. In response to the first recommendation, ATF held conferences, seminars, and briefings for division directors, field coordinators, agents, prosecutors, and State and local officials for training and educational purposes and planned additional meetings in the future. The role of the field coordinator has continued to be reviewed and ATF also revamped the YCGII reporting instructions in December 1999. They now include clear instructions on

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identifying the appropriate investigative work to be associated with this initiative.

ATF is developing a "best practices" pamphlet. This will reiterate the basic guidance for the conduct of this program and includes recommendations from some of the more active offices.

In response to the second and third recommendations, ATF is now using an average number of special agents per YCGII city instead of requiring a specific number. This allows flexibility in allocating special agent resources where they are most needed. YCGII cities with a large population center such as New York City would have significantly more agents involved in these cases than a small city, such as Bridgeport, Connecticut.

ATF will continue to provide resource allocation guidance to field divisions and continually assess workloads. A 10-city pilot program using contract employees was started to fill gaps in the firearms trace process in YCGII cities. ATF's Special Agent In Charge of Resource Management gave a detailed briefing to division directors, which covered relevant workload requirements for YCGII. ATF expects to continue the process of requesting evaluation input for division directors' appraisals rating their performance in executing YCGII and other programs started by the previous ATF Director.

We believe the above actions meet the intent of our recommendations and should help to improve both the implementation of YCGII in new cities and in management oversight of the program.

Details

ATF field offices performed certain YCGII activities, but other actions important to the program were performed inconsistently. To illustrate, all the original YCGII cities signed a Statement of Participants and ATF field offices appointed YCGII coordinators. These Statements of Participants emphasized the commitment of each city and of ATF to trace firearms and engage in activities to investigate significant firearm traffickers. YCGII coordinators were found to be conducting various activities to support the program. However, the field offices did not always perform all activities that Headquarters guidance considered important for the program to succeed, such as:

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- Reconciling ATF records of trace requests received with police department records of crime guns recovered. Such reconciliations help ensure all recovered firearms are submitted for tracing purposes.
- Conducting "end-to-end" traces of a sample of firearms recovered from youth to obtain a more complete picture of the illicit firearms market for purposes of developing strategies for targeting traffickers.²
- Ensuring that ATF special agents work actively with ATF Industry Operations inspectors to more effectively target FFLs with a high number of crime guns traced to them.

Table 2 on the next page summarizes the extent to which field offices were performing the above activities based on our interviews with the YCGII coordinators.

² An "end-to-end" trace involves a series of field interviews with private citizens who have bought, sold, or traded a firearm that was later recovered from a youth. The period between the initial sale of a firearm and its recovery by a police department could span many years during which time the firearm may have passed through a number of private citizens.

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TABLE 2
Summary of Activities Performed By Field Offices

YCGII City	Reconcile Trace Request Totals to Police Records	Conduct End to End Traces of a Sample of Routine Cases	Work Actively with Field Office Industry Operations
Atlanta	[REDACTED]	[REDACTED]	[REDACTED]
Baltimore	[REDACTED]	[REDACTED]	[REDACTED]
Birmingham	[REDACTED]	[REDACTED]	[REDACTED]
Boston	[REDACTED]	[REDACTED]	[REDACTED]
Bridgeport	[REDACTED]	[REDACTED]	[REDACTED]
Cleveland	[REDACTED]	[REDACTED]	[REDACTED]
Inglewood	[REDACTED]	[REDACTED]	[REDACTED]
Jersey City	[REDACTED]	[REDACTED]	[REDACTED]
Memphis	[REDACTED]	[REDACTED]	[REDACTED]
Milwaukee	[REDACTED]	[REDACTED]	[REDACTED]
New York	[REDACTED]	[REDACTED]	[REDACTED]
Richmond	[REDACTED]	[REDACTED]	[REDACTED]
St. Louis	[REDACTED]	[REDACTED]	[REDACTED]
Salinas	[REDACTED]	[REDACTED]	[REDACTED]
San Antonio	[REDACTED]	[REDACTED]	[REDACTED]
Seattle	[REDACTED]	[REDACTED]	[REDACTED]
Washington, DC	[REDACTED]	[REDACTED]	[REDACTED]

Source: Interviews with YCGII coordinators

[REDACTED] As a result of not performing one or more of the activities, the other field offices were less assured that ATF special agents and local police departments were appropriately targeting traffickers who supply firearms to local youths for investigation. It should be noted that some ATF field offices were performing proactive activities not shown in Table 2. To illustrate, some field offices have initiated contacts with community groups such as the local clergy, medical officials, and school administrators in order to make them aware of ATF programs like YCGII, as well as other proactive programs ATF is involved in to combat crime.

In 1996, ATF Headquarters officials issued various directives to division directors of its field offices describing the need to perform the activities summarized in table 2 and to monitor the implementation of these activities. In addition, ATF's guidance included other administrative

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procedures such as reporting requirements. This is discussed further in Finding 3.

Field offices had not performed activities such as those described above for several reasons. First, current YCGII coordinators were not always familiar with the existing guidance, or felt it was inadequate. In addition, several YCGII coordinators were new to the position and unaware of other procedures that more experienced YCGII coordinators had found successful. Second, ATF did not have a model to allocate special agent resources to YCGII, and where to place new hires as a result of recent congressional funding. These causes are discussed in more detail in the following two sections of this finding.

Need To Update Guidance

Seven of the 17 YCGII coordinators we interviewed believe guidance ATF Headquarters issued was inadequate. These YCGII coordinators stated that they had been appointed as YCGII coordinators without further instructions from Headquarters, or from field office division directors, on how to implement the program within each field office. As a result, these YCGII coordinators had developed their own procedures through a trial and error process. They did not benefit from coordinators in other field offices who had already developed their own procedures. Consequently, YCGII coordinators had developed different procedures with none considered by Headquarters as the optimum choice. Also, eight YCGII coordinators stated they had been in their position less than 2 years. Since YCGII started in 1996, these YCGII coordinators may be the second or third person to hold the position. The turnover in YCGII coordinators could have contributed to the loss of continuity in following Headquarters guidance in certain field offices.

As YCGII expands to new cities, it is important that ATF Headquarters ensures that newly appointed YCGII coordinators (a) have all of the guidance that has been issued for the program and (b) understand their duties as YCGII coordinators. We believe providing all YCGII coordinators with updated guidance, and a working model of best practices that other field offices have found successful could strengthen field office activities. For example, certain field offices described procedures to help ensure that cities are submitting trace requests for all firearms recovered in crimes and where to position the YCGII coordinator in the field office organizational structure so that they can carry out their responsibilities in the most effective manner. The best practices model should allow the YCGII coordinators flexibility because

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each city and field office will operate in a different environment. Secondly, flexibility in the model allows smaller field offices to select those steps it can realistically expect to complete with existing resources.

We discussed these issues with ATF's YCGII Director and how a best practices document could be developed. For example, ATF could form a task force of YCGII coordinators from cities with successful programs to obtain information from existing field office programs on activities that worked most successfully. This information could be used to update existing guidance and recommend new activities, which would enhance the effectiveness of YCGII.

To ensure that field offices implement the guidance, the YCGII Director should evaluate division directors' efforts to implement and monitor YCGII activities. ATF had no formal process which allowed the YCGII Director to comment on division directors' YCGII-related activities.

Need To Develop A Better Method To Allocate Special Agent Resources

ATF had not sufficiently analyzed how to allocate special agents hired as a result of funding provided by Congress for YCGII. In FY 1999, Congress had appropriated \$16 million to hire 81 Full-Time Equivalent special agents, which were to be allocated to the field offices near cities participating in the YCGII program. As a result of the funding, the ATF Assistant Director of FEA, in a March 1999 memorandum, advised all field divisions with YCGII cities to assign a minimum of six special agents to the YCGII Program. These special agents were to focus a majority of their time on YCGII firearms investigations. ATF would then hire six new special agents to replace the special agents assigned to YCGII.

Table 3 on the next page shows the status of field offices adherence with the directive and the status of new hires.

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TABLE 3
ATF Special Agents Working on YCGII Program
In Original 17 Cities

YCGII City	Agents Assigned Per ATF	
	Experienced Agents for YCGII (8/99)	New Agents (11/99)
Atlanta		
Baltimore		
Birmingham		
Boston		
Bridgeport		
Cleveland		
Inglewood		
Jersey City		
Memphis		
Milwaukee		
New York		
Richmond		
St. Louis		
Salinas		
San Antonio		
Seattle		
Washington, DC		
Total Agents		

Source: ATF Staffing Data

The YCGII Director commented that ATF Headquarters' decision to allocate six special agents to the program and hire six new special agents for each field office was not based upon an analysis of the firearms trafficking problem at each of the cities in the program at the time Congress appropriated the funds. Accordingly, this methodology could result in an inefficient allocation of special agents to the field offices. To illustrate, two YCGII coordinators explained that their cities did not have a significant enough firearms trafficking problem to assign six special agents to the program. Another YCGII coordinator stated that if the field office had assigned six special agents to YCGII, it would be unable

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to conduct other investigations involving arson or explosives, because the field office did not have a sufficient number of experienced agents.

Consequently, for the reasons previously cited, the division directors had not always complied with the memorandum requirements. As Table 3 shows, 11 of the offices had not assigned six special agents to YCGII and 11 field offices had not received the six new special agents. Additionally, for those field offices that had designated six experienced special agents for YCGII, ATF was unable to provide supporting documentation to show that the special agents were spending a majority of their time on YCGII as required by the March 1999 memorandum.

As YCGII expands and Congress provides additional funding, ATF needs to develop a more sound methodology for allocating special agents hired to investigate YCGII related crimes. Otherwise, there is an increased risk that special agents could be assigned to field offices where these types of offenses are not as significant. Other field offices that have a more significant number of crimes may not be able to conduct all significant investigations because they were not assigned a sufficient number of special agents. Once a sound methodology of allocating agent resources is developed, ATF should ensure that sufficient records are maintained to show that the special agents assigned to YCGII investigations are, in fact, investigating those types of offenses.

As ATF resources expand to combat firearms trafficking to youths, ATF also needs to determine where to place the YCGII coordinator within the field office structure, and how many other duties this individual should have. YCGII coordinators explained that they have responsibilities other than YCGII. For example, they may be the Violent Crime or Project LEAD Coordinators, in addition to having investigative caseloads. As a result, they are less likely to complete all of the important activities and responsibilities in the directives that ATF has issued for YCGII.

Actions Taken By ATF

We discussed these issues with the YCGII Director, who has begun the process for taking various actions to address them. In November 1999, a national conference of YCGII coordinators was held. Among the issues discussed were the responsibilities of the YCGII coordinators, and where the YCGII coordinator position should be located in ATF's management structure. The YCGII Director recommended that the position of YCGII coordinator be in ATF's Intelligence Unit.

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The YCGII Director also has plans to continue conducting YCGII conferences to address other issues like those in this finding. To illustrate, at the November conference, YCGII coordinators were provided data showing deficiencies in trace requests submitted by the cities. The YCGII coordinators were requested to work with their respective police departments to resolve the data deficiencies, so trace requests will be submitted to the NTC more completely. Subsequent conferences may include representatives from local police departments.

Lastly, during the course of conducting our audit fieldwork, ATF took steps which give the YCGII Director the opportunity to comment on division directors' performance evaluations as related to the tracing program.

If implemented, these actions should help strengthen field office YCGII activities.

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Finding 2. Better Communication Needed Between ATF And Police Departments

Not all police departments submitted trace requests on every firearm recovered. Additionally, certain police department YCGII representatives were either not familiar with, or did not avail themselves of ATF's analytical tools to help target firearms traffickers for investigation. As a result, YCGII programs in certain cities may not be addressing the most significant firearms trafficking investigations. Not all ATF field offices regularly communicated with the cities to verify that trace requests were submitted for all firearms, and to determine the resources needed to ensure the cities' active YCGII participation. Police department representatives also stated that analytical information was not always provided or was not easily accessible. ATF's current Statement of Participants requires cities to submit trace requests on all recovered firearms and to develop strategies based upon analytical information received from ATF.

Recommendations

The ATF Director should ensure that:

1. More specific guidance is developed for cities to use to determine what activities are important, and what resources are needed to implement YCGII. The guidance should include a process for ATF field offices to: (a) measure each city's implementation of these activities, and (b) work with cities to resolve weaknesses in their activities.
2. Procedures are implemented to terminate the Statement of Participants with cities that cease YCGII activities, and exclude them from future statistical reports on the program.
3. Efforts to help cities implement systems to electronically submit trace requests are continued.
4. Police departments of participating cities are aware of the analytical tools available to ATF. ATF field offices should facilitate police department access to these tools.

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Management Response and OIG Comments

The ATF Director agreed with all the recommendations. In response to the first recommendation, Crime Gun Analysis Branch (CGAB) personnel have started working with cities from the point of their selection to orient participants to the program. Additionally, the CGAB conducts a full assessment of the city's capability for comprehensive tracing after their selection and recommends the steps needed to achieve this, including providing funding to cities to improve their crime gun data collection process. Comprehensive tracing is monitored by the NTC and the results are produced on a quarterly basis. These quarterly reports are provided to the division directors who have YCGII cities located in their field division and to senior management personnel of the FEA. Regarding the first recommendation, it should be noted that at the time of the OIG's fieldwork NTC was providing reports on crime gun trace requests to the field division directors. However, division directors we interviewed were not using the reports to monitor the cities' participation in comprehensive crime gun tracing. We believe ATF should provide guidance to division directors on when and how to use the NTC reports to determine whether cities are submitting trace requests on all recovered firearms.

In response to the second recommendation, ATF is revisiting the level of participation for all YCGII cities. Further, all divisions where the first 17 cities are located will be asked to have Memorandums of Understanding executed to re-state their support, or be given the opportunity to elect to leave the program.

In response to the third recommendation, ATF listed the efforts undertaken during the past year to facilitate electronic trace request submission. These include the recent completion of an updated version of ATF's Electronic Trace Submission System (ETSS), the awarding of a contract for the electronic return of trace results information, and continuation of work in developing the Regional Gun Center concept. The foundation of the Regional Gun Center concept is the transmission of crime gun information in an efficient manner that also allows for refinement of the data. ATF has also developed an ETSS "hub" concept that will allow police departments to transfer information to a file server, where the data is cleaned up and then sent to the NTC. Regarding the third recommendation, the OIG believes ATF should revisit the early YCGII cities that do not yet have efficient trace request submission systems and recommend steps needed to achieve this.

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In response to the fourth recommendation, ATF has taken various actions to assist police departments in their use of ATF analytical tools including the previously cited Regional Gun Centers, access to On-Line LEAD through ATF-assigned police officers, as well as additional training.

The OIG believes the above actions meet the intent of our recommendations and should help to improve both the implementation of YCGII in new cities and management oversight of the program.

Details

Certain field offices have not initiated regular communication with the police departments to determine whether cities were submitting trace requests to the NTC for all firearms recovered, or to determine what analytical information would be beneficial to the police departments. As a result, certain police department representatives explained that their departments were not performing specific activities that ATF considers important to the program. To illustrate:

- 4 police departments were not submitting trace requests on all firearms recovered.
- 11 police departments were not using information available in On-Line LEAD for firearms investigations.
- 4 police departments were not using ATF maps showing the location of where firearms were recovered.

Consequently, when cities do not perform the above activities or make use of the data provided by ATF, they are less likely to identify traffickers of firearms to youths. As a result, youth crime rates may not be impacted to the maximum extent possible in these participating cities. ATF's most recent Statement of Participants includes commitments by the cities and ATF to: (a) develop and exchange information relating to the unlawful acquisition, illegal trafficking, and criminal misuse of firearms; (b) ensure that all recovered crime guns are traced through the NTC; and (c) ensure that ATF is the central recipient of all crime gun related information and that this information is then analyzed, shared, and used in the furtherance of the strategic enforcement objectives.

Other cities that have more recently joined YCGII have signed Statements of Participants which call for combining the efforts of ATF

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special agents, local police, and National Institute of Justice researchers to develop new methods of mapping illegal firearms trafficking patterns and practices as related to illegal trafficking of firearms to youths. The Statement of Participants also calls for providing more ATF support for state and local enforcement efforts aimed at intervening in the illegal local youth firearms market.

There were several reasons why police departments were not conducting activities such as submitting trace requests or using ATF analytical data. The following sections summarize these reasons in more detail.

Method For Trace Request Submission Was Not Uniform

Cities were using inefficient methods for either submitting trace requests or entering trace data. In a memorandum dated August 4, 1997, the Deputy Associate Director for Criminal Enforcement (Programs) advised all division directors to tell participants that the new YCGII funding will provide their departments/agencies with the needed software and hardware to establish direct electronic batch downloading of crime gun trace requests. ATF's February 1999 Crime Gun Trace Analysis Report states that the electronic transfer of trace requests is more accurate and cost-effective for both ATF and cities, and makes tracing a large volume of crime guns manageable.

Of the four police departments that were not submitting trace requests on all recovered firearms, representatives for two police departments said the reason was because they do not have a computerized system for trace request submission. The representative for the third police department said it was submitting some trace requests, but not all, due to problems with the police department computer system. Our review found that the fourth city did not participate in any YCGII activities. For example, it did not submit trace requests for all recovered firearms and did not have a YCGII representative. However, as 1 of the original 17 YCGII cities, it has continued to be included in ATF budget requests and statistical reports on YCGII.

Of the 13 cities we contacted that were submitting trace requests for all firearms:

- 5 cities were electronically submitting trace requests directly from the police department to the NTC.

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- 2 cities were electronically sending trace requests to the ATF field office, which then submitted them to the NTC.
- 6 cities sent trace requests to the field office through less efficient means. These means included sending information by disk, by fax, or by providing police reports to the ATF field office, which then had to fill out the trace requests and submit them to the NTC for processing.

When cities are not in direct electronic communication with the NTC, either the police department or ATF personnel have to take time to submit trace requests in a less efficient manner. As a result, there is a risk that they may not submit the information timely, completely, or at all.

Of the 13 cities we contacted that were submitting trace requests for all firearms, only 2 had a system where trace request information is recorded when the firearm was inventoried as evidence. Recording trace request information at the same time that the firearm is inventoried eliminates the need for firearm information to be entered a second time for tracing purposes. Four other cities were working with ATF to develop systems with this capability. The remaining cities had systems that require police department or ATF personnel to enter the trace request information separate from when the firearm was inventoried as evidence. ATF personnel advised us that they were continuing efforts to provide cities with necessary software and hardware for electronic firearms trace request submission.

More Guidance Should Be Provided To Cities

Cities were enrolled in YCGII before ATF discussed with police department representatives what activities were required for the program to succeed. The Statement of Participants that each original city signed with ATF was basic in nature and only recognized the commitment of each party to use firearms tracing for weapons recovered in crimes. As previously noted, the Statement of Participants has since been revised and contains more detailed information. Although it explains what a city is supposed to do, ATF did not provide cities with a more detailed plan of action highlighting specific activities that each party would perform in order to implement YCGII in that specific city.

We discussed these issues with the YCGII Director, who recognized the need to improve communications between the YCGII coordinators and

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the cities. As part of that effort, ATF should develop specific guidance for cities to use in implementing YCGII. ATF should also develop a means, such as a scorecard, by which YCGII coordinators can measure the success of the implementation of the program in each field office and take action to work with cities to improve activities that are deficient.

The YCGII Director explained that police departments should:

- Request traces on all recovered firearms,
- Ensure that possessors of recovered firearms are interviewed to determine their source,
- Collaborate with ATF in a task force for analysis of information, and
- Develop a gun unit dedicated to investigating firearm offenses.

Without a means to monitor the cities' activities relative to YCGII, there is an increased risk that the program's benefit will be diminished and investigations of significant traffickers may not be conducted.

Improve Awareness And Access To Analytical Data

Not all police departments were using the analytical data and tools that ATF can provide to develop strategies to combat illegal firearms trafficking to youths. These tools include: (1) On-Line LEAD, (2) mapping of recovered firearms, and (3) other statistical data as shown in the annual Crime Gun Trace Analysis reports.

Specifically, On-Line LEAD is ATF's automated illegal firearms trafficking information system that provides leads to ATF special agents by analyzing crime gun trace data, suspect gun information, stolen firearms information, and multiple sales information to identify recurring trends and patterns that may indicate illegal firearms trafficking.³ ATF can perform mapping by plotting the locations where firearms were recovered to show those specific locations with a high rate of crimes involving firearms. The annual Crime Gun Trace Analysis Reports include firearms trace data such as: (a) age of possessor; (b) type of firearm, manufacturer and caliber; (c) crime types most frequently

³ We did not evaluate the effectiveness of the On-Line LEAD System in providing investigative leads as part of this audit.

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associated with trace requests; and (d) time-to-crime rates for those crime guns most frequently requested for tracing.⁴

Representatives we spoke to in six police departments said they were not aware of On-Line LEAD. Five others said they did not use On-Line LEAD information because it was not easily accessible. Currently, On-Line LEAD information is accessible only at ATF field offices. The YCGII Director favors making On-Line LEAD available to the police departments but only through the field offices to reduce the risk of police officers and ATF special agents initiating the same investigations independently of each other. The duplication of investigations may result in a waste of resources. There is also a potential safety risk to law enforcement officers involved. Specifically, ATF may have already started an undercover operation of an individual that a police department, being unaware of the undercover operation, also has an interest in investigating. The second investigation could compromise the undercover operation, which may endanger the lives of the individuals involved. Because On-Line LEAD will only be available at the field offices, the YCGII Director agreed that more training is required to encourage use of On-Line LEAD information by the police departments.

Four police department representatives said they would like to receive ATF mapping data of locations where firearms are recovered. Four others did not want mapping from ATF because the police department had their own mapping capability. Accordingly, ATF should determine which cities would benefit from mapping and ensure that their YCGII coordinators provide mapping data to them on a recurring basis.

We also discussed the annual Crime Gun Trace Analysis Reports with the YCGII Director, who explained that the current format will be discontinued in favor of a new version that will be tailored more to localities. Two police department representatives mentioned they would like to receive more tailored analytical data from ATF. One police department representative said he would like to receive more training from ATF on how to teach other law enforcement personnel about firearms tracing, which would include using this analytical data.

⁴ Time-to-crime is the time between the initial retail sale of a firearm by an FFL and its recovery as a crime gun, or the submission of a trace request. This measure can be an important indicator of illegal firearms trafficking.

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Actions Taken By ATF

The YCGII Director advised us that recently NTC personnel have visited new YCGII cities to present information on YCGII. The YCGII Director agreed to have NTC personnel present this information to the original cities as well. Also, ATF has recently provided firearms-related training to police department personnel, which included capturing firearms information needed for tracing.

These actions by the YCGII Director will help strengthen activities performed by the cities to implement YCGII. As part of this overall effort, ATF should be able to provide more specific guidance to cities based upon the lessons learned since the program's inception. Such guidance should be accompanied by a means for YCGII coordinators to measure implementation of certain activities. This guidance should be combined with an effort by ATF to increase the awareness of cities of the analytical tools that ATF has to further strengthen investigations of firearm traffickers to youths.

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Finding 3. Performance Measures And Data Verification Needed

ATF has not developed specific performance measures that show the actual impact on crime rates for youths in cities as a result of participating in YCGII. Additionally, ATF has not developed a formal process to verify certain statistics that have been reported to Congress about the program's results. Consequently, reported statistical information may not be accurate. The Results Act requires performance measurements and data which are results oriented. Additionally, agencies need to have a good data verification process to ensure accurate reporting of data. With these types of measures and with accurate data, ATF and other decision-makers will be able to better determine the actual impact that YCGII has had on youth crime rates in participating cities. ATF officials acknowledge that better measures of YCGII's program impact are needed.

Recommendations

The ATF Director should ensure that:

1. Performance measures are developed for YCGII that gauge its impact on crime gun traffickers who supply firearms to youths.
2. Procedures for data verification are developed to ensure the validity and accuracy of the performance measures developed in response to Recommendation 1.

Management Response and OIG Comments

The ATF Director agreed with the recommendations. As noted in the response to Finding 1, ATF has revamped the reporting instructions. ATF is in the formulation stage of a joint assessment demonstration project with the National Institute of Justice, which will be working on viable measures for YCGII cities.

ATF is examining performance measures such as reduced time to crime, reduction in the average number of guns trafficked per investigation, and reduction in the percentage of the population illegally possessing guns comprised of persons under the age of 24.

ATF has also recently released the sequel to its report *Following the Gun*, which provides additional analysis by a Harvard researcher of

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those cases considered to meet the YCGII parameters. In response to the second recommendation, ATF is now using periodic random sampling for verifying the accuracy of filed reporting. To address its concern with refinement of data, ATF has contracted with principals from Carnegie-Mellon Institute for continued work in a program for geo-coding of data, and are also looking at other technical means to clean up geographical information in the data.

We believe the above actions meet the intent of our recommendations and should help to improve both the implementation of YCGII in new cities and in management oversight of the program.

Details

As its principal performance measure for YCGII, ATF has tracked the number of trace requests received by the NTC from participating cities. However, ATF has not developed results-oriented performance measurements to show the full impact YCGII has had in cities participating in the program.

ATF has used the number of trace requests as its primary performance measure because it recognized that a city's commitment to submit trace requests on all firearms recovered in crimes was crucial to the program. Traces needed to reach a sufficient level so that analysis could provide data that would significantly strengthen ATF's inspection program and provide vital support to ATF, State, and local criminal investigations.

Table 4 on the next page shows the average number of firearm trace requests submitted monthly over the last 3 years by cities originally selected for YCGII.

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TABLE 4
Traces Submitted By Participating Cities
Monthly Average

YCGII City	1997 (7/96-4/97)	1998 (8/97-7/98)	1999 (8/98-6/99)
Atlanta			
Baltimore			
Birmingham			
Boston			
Bridgeport			
Cleveland			
Inglewood			
Jersey City			
Memphis			
Milwaukee			
New York			
Richmond			
St. Louis			
Salinas			
San Antonio			
Seattle			
Washington DC			

Source: OIG Analysis of ATF's Crime Gun Trace Analysis Reports

Table 4 shows the challenge in using the number of trace requests submitted as a measure of the program's success. It is difficult to determine whether an increase or decrease in the monthly average is due to a change in a city's crime rate, or a change in ATF's efforts in ensuring all recovered firearms are being submitted for tracing purposes or investigation of firearms cases.

The YCGII Director and ATF's Strategic Planning Director cited several factors could influence the number of trace requests submitted by the cities. For example, a decline in the number of firearms traces could be the result of significant investigations performed by ATF and participating police departments. However, a decline in trace requests submitted could be due to factors other than the impact of the program. As the yearly reports explain, the police departments were in various stages of electronic and procedural changes to enhance comprehensive

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tracing of all firearms recovered. Other social and economic factors may further influence the number of crimes committed with firearms and the number of trace requests submitted. All of these factors would cause this statistic alone to provide an incomplete or inaccurate picture of the success of the program in a specific city.

In addition to the number of trace requests submitted, ATF also provided Congress supplemental information in a February 1999 report to the Senate and House Committees on Appropriations to show the success of the program.⁵ This information included, for example: (a) number of juvenile and/or youth related illegal trafficking investigations, (b) number of illegally trafficked firearms, and (c) number of defendants submitted for prosecution. The data that was reported to Congress, however, did not include information on State and local investigative activity undertaken jointly outside of task forces.

Although the above types of statistics are useful, ATF needs results-oriented performance measures which reflect the actual impact that YCGII has had on youth crime rates in the participating cities. The Results Act implemented Congress' intent to hold agencies accountable less for inputs and outputs, like the above information, than for outcomes. By outcomes, the Results Act meant the results of government programs as measured by the differences they make, for example, in the lives of the citizens. With current measures, the volume of firearm trace requests submitted, or by the other supplemental data provided to Congress, ATF can not demonstrate that as a result of YCGII, there has been a decrease in crime rates and illegal firearms trafficked to youths.

According to the Strategic Planning Director, enforcement programs like YCGII need to establish measurements to demonstrate the actual impact of the program. Such measurements, for example, could include a reduction in the crime rate involving youths with firearms in the cities participating in YCGII. The link between YCGII and such a desired outcome is often difficult to establish and may not, in fact, be apparent for years. However, without such measurements, ATF will have less information to provide Congressional and executive branch decision-makers to determine the extent that the program should continue to be supported.

⁵ Youth Crime Gun Interdiction Initiative Performance Report

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One possible measure is the statistical model ATF uses to identify potential YCGII cities. The model uses data compiled from the Uniform Crime Report issued yearly by the Department of Justice. A possible performance measure could be based upon a reduction in youth violent crime rates after the city joined the program.

Data Verification Procedures Needed

In its February 1999 report on YCGII to the Senate and House Committees on Appropriations, ATF stated that the report framework did not permit a detailed review and verification of all the submitted information. With the continued development of YCGII, ATF intended to pursue more routine, detailed, and verified reporting from its field offices to facilitate analysis of the effectiveness of enforcement and the development of enforcement policies.

Our review of field office procedures, however, still showed ATF had no formal process for verifying accomplishments. OIG auditors noted errors in quarterly reports prepared by the field offices for YCGII. For example, these errors included transferring data from one form to another incorrectly, counting non-YCGII cases in the total number of investigations, or reporting the number of firearms interdicted without any defendants being reported. These types of errors can be attributed to both human error and a lack of understanding of what information is supposed to be captured. To illustrate, YCGII coordinators stated they were not clear on the definition of a "YCGII case" and what they should be reporting, as discussed at the November 1999 National YCGII Conference.

ATF Headquarters and field offices did not have a formal verification procedure for reported accomplishments. Errors in the data verification process raise concerns about the reliability of and method for gathering YCGII statistics.

Actions Taken By ATF

ATF's Assistant Director, FEA, has drafted a briefing paper that details new instructions for coordinators. These instructions include a definition of a YCGII case. ATF will also capture additional information not previously recorded. This information includes such activities as the number of investigative interviews conducted and the number of leads developed from the interviews. Ultimately, ATF Headquarters

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personnel will be able to more easily extract the information from ATF's new information system "N-Force" instead of the YCGII coordinators.

If implemented, these actions should help to strengthen the reporting of accomplishments and other activities associated with YCGII. The development of results-oriented performance measures will help to show the actual impact of YCGII and provide Executive branch officials and Congress with information to determine the amount of funding appropriate for the program.

ABBREVIATIONS

ATF	Bureau of Alcohol, Tobacco and Firearms
CGAB	Crime Gun Analysis Branch
ETSS	Electronic Trace Submission System
FEA	Office of Firearms, Explosives and Arson
FFL	Federal Firearms Licensee
FTS	Firearms Tracing System
NTC	National Tracing Center
OIG	Office of Inspector General
OI	Office of Inspection
Results Act	Government Performance and Results Act of 1993
YCGII	Youth Crime Gun Interdiction Initiative

Pages 30 through 93, consisting of Management's Response, has not been included in this posting.

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