Integrity Oversight Review of the United States Secret Service Inspection Division

February 2001

Office of Investigations

Office of Inspector General

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United States Department of the Treasury

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We found that the USSS has no centralized tracking or reporting system for employee misconduct allegations and they are, therefore, unable track misconduct allegations that were handled as management issues. Also, the decision to refer misconduct matters to the INS for investigation is at the discretion of the Assistant Director's (AD) Office to which the employee is assigned.

Of the 75 discipline files reviewed, we found four instances in which discipline was not administered consistent with penalties imposed for similar offenses of misconduct. We also found that in 13 instances, discipline was not administered in a timely manner. In addition, the USSS did not always follow official grievance procedures and the discipline log used by ERB staff to track discipline actions contained numerous errors.

BACKGROUND

According to Treasury Directive 40-01, "Responsibilities of and to the Inspector General," dated September 21, 1992, the Office of Inspector General (OIG) is responsible for overseeing the internal investigative functions of the U.S. Secret Service (USSS) Inspection Division (ISP). Pursuant to this Directive, the OIG Treasury Integrity Division conducted an oversight review/inspection of the USSS ISP to determine the quality of its investigative operation. In addition, the OIG Office of Audit conducted a review of the USSS discipline process to determine if the USSS application of discipline was consistent with USSS policy.

SCOPE AND METHODOLOGY

The scope of our inspection was to assess the efficiency and effectiveness of the ISP's operation for the time period July 1, 1999, through July 31, 2000. We evaluated the areas of management; staff qualifications; case load; independence; due professional care; quality control; and operational process. Additionally, we evaluated the handling and processing of allegations from receipt of an allegation and subsequent investigation to tracking the final disposition; the quality and timeliness of internal investigations; the internal quality control of their investigative reports; and the management case review system. Management decisions relative to discipline taken were also reviewed to determine if those decisions were consistent with USSS policy and procedures.

The ISP reported that during the period July 1, 1999, through July 31, 2000, there were 62 investigative case files closed. The OIG reviewed all 62 case files. The allegations were categorized as criminal or non-criminal. Examples of the type of cases were: assault, theft, employee fraud, false statements, bribery, drug abuse, improper conduct, and sexual harassment.

We used the USSS ISP standards for investigative reporting and generally accepted investigative standards for our review.

OFFICE OF INSPECTION

MANAGEMENT

The U.S. Secret Service Office of Inspection (INS) is managed by an Assistant Director (AD)[1] and a Deputy Assistant Director. The Inspection Division (ISP), the operational component of the INS, is supervised by a Special Agent in Charge (SAIC) and a Deputy Special Agent in Charge (DSAIC). A confidential (Inspection Division only) case management computer system is used to track the investigation process. The SAIC/DSAIC conduct periodic internal assessments relevant to operational activities and make operational adjustments, as necessary. An internal review process is utilized for all investigative reports to ensure investigative performance is consistent with established agency and professional standards.

STAFF QUALIFICATIONS

The investigative staff of 21 inspectors (criminal investigators) collectively possessed the necessary professional characteristics to conduct the range of expected internal investigations and field office inspections. All agents assigned to the ISP were either GS-14's or GS-15's and, through experience and training, are qualified investigative personnel. All inspectors are physically located at Headquarters, USSS, Washington, D.C.

CASELOAD

During the period July 1, 1999, through July 31, 2000, the ISP opened 47 investigations. During this period, ISP closed 62 investigations. Investigations are considered closed upon final adjudication.

At the time of this review, there were 33 open cases. The average caseload was two investigations for each inspector. In addition to conducting ISP investigations, inspectors are responsible for conducting inspections of the USSS Field Offices and providing agents for protection duty. During

[1] An Assistant Director heads each of the following Offices: Office of Administration; Office of Government Liaison and Public Affairs; Office of Human Resources and Training; Office of Inspection; Office of Investigations, Office of Protective Operations, and Office of Protective Research. Each Assistant Director reports to the Office of the Director.

the period of our review, each inspector was involved with an average of ten field office inspections.

INDEPENDENCE

The AD, INS reports directly to the Director's Office. This allows the ISP, the operational element of the INS, to operate in an independent fashion as investigations are directed from ISP and INS without influence from Field Offices and supervisors of those individuals being investigated. Inspectors are required to recuse themselves from investigations where a perceived or actual conflict of interest could arise.

DUE PROFESSIONAL CARE

Specific methods and techniques employed by investigators were appropriate for the circumstances and objectives of the investigations. We found the investigations were conducted in a fair and impartial manner consistent with agency guidelines.

OPERATIONAL PROCESS

Supervisory controls existed over the operational process concerning the receipt and control of investigations. The controls allowed for the effective analysis, accurate cross-referencing and efficient retrieval of required information. Sufficient procedures were in place to safeguard and protect confidential sources and information. The case management system used to track the investigative process, as well as the investigative case files, can only be accessed by ISP personnel. All investigations conducted by the ISP were entered into the tracking system and documented on an Incident Report.[2]

ALLEGATION INTAKE AND REVIEW PROCESS

We found that the USSS has no centralized tracking or reporting system for employee misconduct allegations. Also the INS is to unable track misconduct allegations that were handled as management issues by other AD Offices. Further, the INS and ISP do not track queries received concerning allegations.

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[2] An Incident Report is a document containing the information received, including employee name, date received and the nature and details of the allegation.

We also found that an allegation of employee misconduct is not first provided to the INS to evaluate and determine whether an investigation should be conducted. Rather, reporting employee misconduct allegations to the INS is at the discretion of the AD's Office to which the employee is assigned (affected AD Office). The affected AD Office has the discretion to handle the allegation as a management issue and not report it to INS.[3] In this instance, the INS and ISP have no record of the allegation or its resolution.

If the INS or ISP receive an allegation directly from a complainant, an Incident Report is prepared, the INS coordinates with the affected AD. Also, the INS can initiate an investigation without notifying or coordinating with the affected AD, if the AD for INS obtains prior approval from the Director or Deputy Director of the USSS.

Of the 62 case files reviewed during this inspection, six originated from a government entity external to the USSS, five were from private citizens, one was an anonymous phone call received by INS, and four originated from different local police departments. The remaining 46 allegations were referred by USSS management to INS for investigation.

OFFICE OF INSPECTION CASE FILE REVIEW

Case files were examined to determine the proper handling and processing of allegations from receipt of an allegation and subsequent investigation to tracking the final disposition; the quality and timeliness of internal investigations; the internal quality control of their investigative reports; and the management case review system.

REFERRED ALLEGATIONS WERE HANDLED IN A TIMELY MANNER

We reviewed each investigative case file to determine how many days it took the ISP to initiate an investigation after receipt of an allegation referral. The time between the date that ISP received the allegation and the date that an investigation was initiated, in most instances, was within three days. The allegations received by the ISP were handled effectively, efficiently and in a timely manner.

[3] This is a matter of policy, Section IOP-09, USSS Internal Operating Procedures, and practice.

ALLEGATIONS WERE FULLY INVESTIGATED

We reviewed each investigative case file to determine whether all allegations were fully investigated. We found that information in the complaint was adequately addressed, all logical investigative leads were developed and pursued, and appropriate investigative techniques were applied.

TIMELY COMPLETION OF INVESTIGATION ACTIVITY

We reviewed each investigative file to determine whether investigative activities were completed timely. We considered the date that the allegation was received through the date that the investigative results were referred to an action official. All investigative case activities were completed in a timely manner.

INVESTIGATIONS WERE REPORTED APPROPRIATELY

We reviewed each investigative case file to ensure that investigations were reported to the appropriate action official. The investigative results were reported either to the U.S. Attorney's Office or to management, or both. Reports were prepared for the cases indicating that the investigations were continued, pending disposition, or closed. Cases were monitored and held open in a pending status until final disposition.

ADMINISTRATIVE CONTROL OVER INVESTIGATIONS

We evaluated the ISP's automated case tracking system to determine whether investigations were being tracked appropriately and accurately. Our review found that the automated case tracking system was functioning, complete, and up-to-date. The case list produced by the system reconciled with the physical case files reviewed. The contents of investigative case files were organized and standardized.

CASE REPORTING STANDARDS

The ISP reporting standards require an initial report within 60 days and subsequent status reports every 60 days. Status reports for investigations pending disposition/action are required every 120 days. We found that 40 of 62 case files were compliant with USSS reporting standards. However, 22 of the 62 (approximately 36 percent) investigative case files reviewed were not in compliance with USSS reporting standards. Five cases were 30 days late in reporting; six

were between 31 and 60 days late; and eleven were more than 61 days late.

DISCIPLINE PROCESS

DISCIPLINE POLICY AND BASIC PRINCIPLES

The USSS requires that all employees maintain high standards of personal conduct and integrity. All employees are expected to adhere to the Department of the Treasury Employee Rules of Conduct and the Standards of Ethical Conduct for Executive Branch Employees. In addition, these standards have been supplemented by additional USSS guidelines. Employees are required to complete an SSF 3218, Annual Employee Certification, certifying that they have reviewed these standards and policies and understand that they are expected to comply with them.

Policies, principles, definitions, and responsibilities regarding discipline are contained in the USSS' Administrative Manual, Section PER-11, entitled Formal Discipline and Adverse Actions. According to this directive, it's USSS policy that when standards are not met, prompt and just corrective action will be taken to promote the efficiency of the USSS and that formal disciplinary and adverse actions will be taken for good cause. The directive also states that disciplinary actions taken should be consistent with other such actions taken for similar infractions. Disciplinary and adverse actions are governed by seven basic principles:

(1) Corrective - The intent of discipline is not to punish, but to correct the behavior. A disciplinary or adverse action should only be as severe as is necessary to bring about the desired change.
(2) Consistent - Similar penalties should be imposed for like offenses, with due consideration given to mitigating or aggravating circumstances.
(3) Nondiscriminatory - Disciplinary and adverse actions should not be influenced by the race, color, religion, sex, age, national origin, political belief, physical handicap, or marital status of an employee.
(4) Timely - Disciplinary and adverse actions should be initiated as soon as practical after the occurrence of the infraction on which the action is based.
(5) Progressive - A more severe action may be imposed when an employee has received a written reprimand or a suspension for an offense occurring within 3 years of

the effective date of the action taken for the last offense.

(6) Constructive - All disciplinary and adverse actions should be taken for good cause and will serve to enhance or maintain individual or aggregate morale and productivity.

(7) Effect on the Service - Disciplinary or adverse action should be taken only for such cause as will promote the efficiency of the Service and only in cases where there is a nexus between the offense and the employee's duties or position.

THE EMPLOYEE RELATIONS BRANCH

The Employee Relations Branch (ERB) within the Personnel Division is responsible for providing advice and guidance to supervisors and managers in the area of disciplinary and adverse actions, grievances, appeals, and employee and management rights.

The discipline process begins when a management notifies an ERB specialist that they have an issue of misconduct and that they want advice or when the ERB receives a report of investigation from the INS.

Any official contemplating an action against an employee must contact the ERB for guidance prior to initiating an action. The ERB provides advice concerning: (1) the advisability of taking an action; (2) the basis for an action; (3) the appropriate action to be taken; (4) ensuring adherence to all procedural requirements; and (5) the preparation of all documentation necessary to effect an action.

The ERB has developed timeframes to prepare and process disciplinary and adverse actions. Guidelines state that the ERB will provide a recommendation to a manager within 10 days after receipt of all information and will prepare a reprimand or proposal within 21 days.

TYPES OF DISCIPLINE

The USSS has three types of formal discipline: (1) letters of reprimand; (2) suspensions of 14 days or less; and (3) suspensions for more than 14 days, reductions in pay or grade, removals, and furloughs for 30 days or less.

According to USSS policy, letters of reprimand are considered formal disciplinary actions, while suspensions of 14 days or less and suspensions of more than 14 days,

reductions in pay or grade, removals, and furloughs for 30 days or less, are adverse actions.

The USSS does not maintain formal written guidelines regarding suggested penalties for specific offenses, such as a table of offenses and penalties.

EMPLOYEE REPLY

An employee receiving notice of a proposed adverse action is entitled to reply orally and/or in writing, and to furnish affidavits and other documentary evidence to support his or her side of the story. The deciding official receives the employee reply. The employee reply is one of the significant factors that a deciding official takes into consideration when determining the appropriate penalty.

EMPLOYEE RIGHTS

An employee may challenge a letter of reprimand by filing a grievance and/or equal employment opportunity complaint. An employee receiving a suspension of 14 days or less is entitled to an administrative review of the suspension by filing a grievance. Employees who receive a suspension of more than 14 days, reduction in pay or grade, removal, and furlough for 30 days or less, are entitled to appeal to the Merit Systems Protection Board.

Information regarding grievances is contained in the USSS' Administrative Manual, Section PER-12, entitled Secret Service Grievance System. An employee has the right to be accompanied, represented, and advised by a representative of his or her own choosing when presenting a grievance.

The ERB is responsible for administration of the grievance system. Normally a grievance concerning a particular act or occurrence must be filed within 15 calendar days of the act. The grievance must specify the relief requested and the relief must be personal to the grievant.

The grievance must be submitted to ERB on an SSF 3112, Grievance Form. The ERB refers the grievance to the appropriate deciding official for resolution. The Secret Service Grievance System Directive states that the deciding official shall issue a written decision to the grievant, stating the reasons for granting or not granting the personal relief requested.

DISCIPLINE LOG

ERB maintains a database to record and track disciplinary and adverse actions. This discipline log includes the employee's name, office, offense charged, action proposed, action decided, status, whether an inspection was conducted, as well as a comments field. This database is located on a secure drive on the LAN and access is limited to ERB staff. The ERB also uses a word processing type document to maintain histories of comparable penalties by subject matter. A list of comparable penalties of the same or similar offense is used to assist the ERB in recommending a fair and consistent penalty to the proposing official.

DISCIPLINE FILE REVIEW

We concluded that, in several cases, discipline administered was not consistent with penalties imposed for similar offenses of misconduct. We found that comparable penalty histories were not always maintained in the discipline case files. We also found that the USSS did not always administer discipline timely. In addition, the USSS did not always follow official grievance procedures. Also, the discipline log used by ERB staff to track discipline actions contained numerous errors.

Of the 75 discipline cases we reviewed, we found that formal discipline was not administered in 29 cases for several reasons. No action was taken in 13 cases because allegations were not sustained or did not warrant discipline. Five employees received either a memorandum of counsel or verbal counseling, which is considered informal discipline. Another five employees either resigned or retired prior to discipline being administered. In three cases, employees' appointments had expired and they were not retained by the USSS. In one case, an employee received a leave restriction letter. In another case, an employee was denied a within-grade increase. In addition, we found that discipline was not administered in one case because the investigation was still open.

Of the 75 discipline files reviewed, 20 of the files were originated based on an inspection report. The remaining 55 were actions taken by managers for performance and misconduct not investigated by ISP. The INS and ISP may or may not be aware of the predicating allegations surrounding the remaining 55 actions.

We reviewed the remaining 46 cases that resulted in discipline being administered to determine whether the penalties imposed were fair and consistent with other penalties administered for similar offenses of misconduct. USSS issued letters of reprimand in 17 of theses cases. Suspensions of 14 days or less were administered in 21 cases. Suspensions for more than 14 days and removals were imposed in 6 cases. In addition, two penalties were held in abeyance.

DISCIPLINE ADMINISTERED NOT ALWAYS CONSISTENT WITH SIMILAR PENALTIES FOR LIKE OFFENSES

According to the USSS Formal Disciplinary and Adverse Actions Directive, Section PER-11, formal disciplinary and adverse actions should be consistent with other such actions taken by the USSS for similar infractions. The directive also states that similar penalties should be imposed for like offenses, with due consideration given to mitigating or aggravating circumstances.

ERB management informed us that to determine appropriate discipline, comparisons are made of penalties imposed for similar offenses of misconduct. Based on a review of comparable penalties, ERB makes a recommendation to the proposing official.

We found that in four cases, penalties imposed were not consistent with other penalties imposed for similar offenses. For example, in one case, an employee received a 14-calendar day suspension for fighting. This penalty was harsher than similar penalties imposed for fighting, which ranged from 2-5 workday suspensions. In addition, a request for an extension of reply time was denied without any explanation.

In another case, an allegation of "providing inaccurate and incomplete information to management in regard to a matter of official interest" was sustained. Although a 1-workday suspension was proposed, the employee was issued a memorandum of counseling. A memorandum of counseling is considered informal discipline. Other penalties imposed for similar infractions included a reprimand, a 2-workday suspension, a 3-workday suspension, and a 10-calendar day suspension. A memorandum of counseling was inconsistent with the other penalties imposed.

In another case, an employee received a 35-calendar day suspension for the misuse of a Government owned vehicle (GOV) on ten different occasions, using frequent traveler

benefits earned in connection with official travel, and making discourteous comments in regard to national origin. The ERB recommended a 60-day suspension to a demotion. Four other USSS employees received a 30-day suspension for a one-time misuse of a GOV.

Although the USSS does not maintain a table of offenses and penalties to determine appropriate discipline, Title 31, U.S.C., Section 1349 (b), states that an officer or employee who willfully uses or authorizes the use of a passenger motor vehicle owned or leased by the United States Government shall be suspended without pay for at least one month, and when circumstances warrant, for a longer period of time or summarily removed from office. Considering the sum of the offenses and penalties for similar actions, a 35-calendar day suspension is inconsistent.

In the fourth case, an employee received a proposal for removal in April 1999 due to the charge "Conduct Unbecoming an USSS Uniformed Division Officer." The proposal was a result of the employee being arrested in March 1998 and charged with various offenses concerning the driving of an automobile while under the influence of alcohol. Although the employee was driving his own vehicle and off duty at the time, he was found guilty of driving while intoxicated in February 1999.

A review of the employee's discipline file revealed a history of disciplinary actions for similar infractions. This employee received a fitness for duty exam in August 1995 as a result of four off-duty incidents within an eight-month period in which the employee was stopped by local police who suspected the employee of driving under the influence of alcohol. In one incident, the police took the employee's Service-issued weapon due to a concern for the employee's safety. This employee also served a 7-day suspension in March 1997 and a 30-day suspension in December 1997 and January 1998.

In June 1999, the final action to remove the employee was held in abeyance due to a Last Chance/Firm Choice Agreement signed by the employee. The decision to hold the removal in abeyance, which in effect amounts to no discipline if terms of the agreement are met, was not consistent with penalties imposed for similar offenses, especially considering the employee's prior discipline history.

We discussed these cases with ERB management. ERB management stated that although the ERB recommends what they believe is an appropriate penalty based on a review of

comparable penalties for similar offenses, the actual penalty imposed is up to the deciding official.

PENALTY HISTORIES NOT ALWAYS DOCUMENTED IN CASE FILES

ERB specialists recommend an appropriate penalty to the proposing official based on a comparison of penalties imposed for similar offenses of misconduct. The ERB maintains a separate file to track penalty histories. Comparable penalties are included in the discipline case file to support ERB's recommendation that the disciplinary action is fair and consistent. We found that comparable penalty histories were not always maintained in the discipline case files. In 10 of the 75 discipline cases we reviewed, penalty histories were not documented in the discipline file. As a result, it was difficult to determine whether the penalty administered was consistent with other penalties imposed for like offenses.

DISCIPLINE NOT ALWAYS ADMINISTERED TIMELY

One of the seven basic principles that govern formal disciplinary and adverse actions is timeliness. According to the USSS' Formal Disciplinary and Adverse Actions Directive, Section PER-11, disciplinary and adverse actions should be initiated as soon as practical after the occurrence of the infraction on which the action is based. In addition, guidelines used by the ERB state that they will prepare a reprimand or proposal within 21 days after receipt of all the relevant information.

We found that in 13 cases, discipline was not administered timely. For example, an employee was suspended for 5-workdays in June 2000 for negligence in the performance of official duties for an incident that occurred in June 1999. The proposing official had contacted the ERB twice in July 1999 requesting that this case be handled as expeditiously as possible. However the proposal notice was not issued until March 2000 and the final decision not issued until May 2000.

In another case, an employee received a 4-workday suspension notice in March 2000 for a fighting incident that occurred in November 1997. An Inspection case was opened regarding this incident and the Assistant United States Attorney notified the USSS in August 1999 that they had no interest in pursuing this case. The proposing official contacted the ERB in October 1999 for a recommendation for discipline. The ERB was contacted again in December 1999 to prepare the

paperwork for signature. The proposal notice was not issued until more than two months later.

In another case, an employee misused government property in March 1999 and did not receive a reprimand until January 2000, more than nine months later. In another cases, a reprimand for failing to implement specific procedures was not issued until January 2000, seven months after the proposing official requested a recommendation for discipline from the ERB in May 1999.

We discussed these cases with ERB management. ERB management agreed that discipline was not administered timely. ERB management stated that discipline was not always administered timely due to staff shortages in the ERB.

GRIEVANCE PROCEDURES NOT ALWAYS FOLLOWED

The USSS Grievance System Directive, states that the deciding official shall issue a written decision to the grievant, stating the reasons for granting or not granting the personal relief requested. We found that the USSS was not always following its grievance procedures. We found that in five cases, no relief was granted to the employee and no explanation was provided as to the reasons why relief was not granted. Although the directive requires that the deciding official's reasons for granting or not granting the relief be provided to the grieving employee, the SSF 3112, Grievance Form, reflects that the reason is "optional." This is in direct contradiction to the directive.

DISCIPLINE LOG NOT ACCURATE

We reviewed the discipline log to determine whether the USSS was accurately tracking disciplinary information. Based on our review of 75 discipline cases, we found that information in the discipline log was not always accurate and consistent.

We found errors in 11 of the cases we reviewed. For example, in one case, the final action recorded on the discipline log was a letter or reprimand. However, the reprimand was never issued because the employee resigned prior to receiving the reprimand. In three cases, the discipline log reflected that no inspection had been conducted, when in fact an investigation had been completed. In other cases, the discipline log recorded "no action taken" when the employee had either resigned, retired, or had been counseled. We discussed these errors with ERB

staff and they took immediate action to correct the discrepancies.

MANAGEMENT RESPONSE

The USSS management response to this report is attached in the following three pages.

DEPARTMENT OF THE TREASURY
UNITED STATES SECRET SERVICE

January 25, 2001

MEMORANDUM FOR MICHAEL C. TARR, ASSISTANT INSPECTOR GENERAL
OFFICE OF THE INSPECTOR GENERAL
DEPARTMENT OF THE TREASURY

FROM: Gregory J. Regan
Deputy Assistant Director

SUBJECT: Integrity Oversight Review
U.S. Secret Service
QA-2000-8-2

There are several areas within the Treasury Department's, Office of the Inspector General's report on the oversight review of the United States Secret Service, Office of Inspection, that need some clarification. First the report should be titled something other than it is currently. The report titled "Integrity Oversight Review of the United States Secret Service Inspection Division" is potentially misleading. This report covers areas that are not under the purview of Inspection Division.

The Inspection Division is merely an investigative entity. If an allegation or situation arises that is deemed to be a management issue, all subsequent action would be undertaken by the respective Assistant Director's (AD) office that exercises supervisory control over the situation. Routinely, discipline that is administered in these cases is based upon the recommendations of specialists within the Employee Relations Branch absent of any input from the Inspection Division. Granted that some of these recommendations are based upon case reports received from the Inspection Division, the majority of discipline cases emanate from management decisions. These decisions are not forwarded nor reviewed by the Inspection Division.

The observations and criticisms of inequities of discipline within the Secret Service are not a function controlled by the Inspection Division. It would appear the report could more appropriately separate the responsibilities of the Inspection Division from those of Human Resources and Training Division and the disparate operational Divisions where discipline is meted out.

The report does correctly identify certain weaknesses within the Secret Service's discipline process, such as the lack of a centralized tracking system for disciplinary matters. This issue is currently being addressed through the establishment of a disciplinary review board. This board's function will be to insure equitable treatment of offenses as well as a central repository for ethical, legal and policy offenses.

The current system does allow slight discretion within each respective ADs office on what should or should not be investigated by Inspection Division. This discretion is attributable to only those matters, which are truly management issues, and does not impugn on the integrity of the Secret Service mission or its reputation. Any allegations that would have a deleterious effect on the Service's mission or reputation, is criminal in nature or impacts upon policy issues are automatically forwarded to Inspection Division for appropriate investigation.

The statement regarding the administrative deficiencies of Inspection Division relative to the timeliness of the reports is accurate; however, there are several mitigating factors, which contributed to these delays. First, the time requirement for investigative report submission is extended during presidential campaign years due to travel requirements placed upon our agents. The Inspection Division does not change its standards and therefore self-imposes, in retrospect, unrealistic schedules. Secondly, due to transfers, retirements and promotions, the Inspection Division experienced a 25% reduction in manpower during this period. Further magnifying this manpower shortage, six additional Inspectors were assigned to presidential campaign details requiring them to be in a travel status over 50% of their time. Lastly, the Secret Service believes that field and operational divisions inspections represent a critical element in the successful maintenance of our mission and, therefore, routine inspections continued despite the manpower shortage. These circumstances are not being presented as an excuse for the tardiness, merely to enlighten the OIG as to the mitigating circumstances.

One inaccuracy noted within the report that should be corrected concerned the belief that Inspection Division initiates an investigation only after approval by the Director or the Deputy Director. The Director and the Deputy Director are notified and continually apprised of all specials within Inspection Division, but an approval is not a pre-requisite to initiating an investigation.

In closing, I believe many of the points and suggestions contained within the OIG report contain merit. But, I contend that the report should be split between the different divisions' responsibilities and noted deficiencies.