



March 2016

# FEDERAL PROTECTIVE SERVICE

## Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning

# GAO Highlights

Highlights of [GAO-16-384](#), a report to congressional committees

## Why GAO Did This Study

The federal security workforce plays a crucial role in meeting the growing challenges of protecting federal facilities. FPS, within the Department of Homeland Security (DHS), worked with NPPD to develop a staffing model and a *Plan* in 2013 and 2015 to help FPS manage its workforce. A 2015 Senate Appropriations Committee report included a provision for GAO to review the *Plan*. The committee also asked GAO to evaluate the staffing model. GAO examined (1) FPS's *Plan* and related human capital planning efforts and (2) how FPS designed and uses its staffing model. GAO assessed FPS's *Plan* and model to determine if they aligned with key workforce-planning principles and practices for designing staffing models. GAO identified these principles and practices from prior work and other sources. GAO also interviewed NPPD and FPS officials in headquarters and three regions selected to obtain regional variation such as in the number of FPS staff.

## What GAO Recommends

To improve FPS's human capital planning, GAO recommends that the Secretary of DHS direct NPPD and FPS to identify time frames for developing performance measures with targets that are explicitly aligned to FPS's goals, establish a plan and time frames for updating its staffing model, and develop and document guidance for ensuring the quality of staffing model data. DHS concurred with GAO's recommendations and outlined steps it plans to take to address them.

View [GAO-16-384](#). For more information, contact Lori Rectanus at (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov).

March 2016

## FEDERAL PROTECTIVE SERVICE

### Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning

## What GAO Found

The Federal Protective Service (FPS)—which protects about 9,500 federal facilities—developed a *Strategic Human Capital Plan (Plan)* and engaged in related efforts that generally align with most key principles GAO identified for strategic workforce planning. Specifically, FPS

- solicited input from key stakeholders, such as its employees and the National Protection and Programs Directorate (NPPD)—FPS's parent organization responsible for managing and overseeing FPS's human capital efforts;
- determined critical skills and competencies;
- developed human capital strategies (i.e., programs, policies, and processes) tailored to address identified gaps and needs in its workforce; and
- identified actions that build the organizational capability to support the strategies.

However, FPS has not fully developed performance measures to evaluate progress toward goals, which is also a key principle for strategic workforce planning. For example, FPS has not identified performance measures for all of the *Plan*'s strategies, has not included targets for the identified performance measures (e.g., a desired target for the "attrition rate" measure), and has not linked the measures to FPS's human capital goals. GAO's work on measuring program performance has found that targets and linkages are among the attributes of successful performance measures. FPS and NPPD officials said they plan on developing measures with targets and linkages but have not yet established time frames for completing these tasks. Without performance measures that have targets and linkages, it will be difficult for NPPD and FPS to assess whether the *Plan* and related efforts are helping achieve FPS's human capital goals and its facility protection mission.

FPS designed its staffing model—which identifies the federal workforce the agency needs to meet its mission—consistent with most key practices GAO identified for the design of staffing models, and FPS uses the model to help make management decisions. Specifically, FPS's model includes:

- work activities and the time required to perform them;
- facility risk levels, which determine the frequency with which FPS must complete facility security assessments; and
- input from key stakeholders, including NPPD and some regional officials.

FPS officials said they took steps, such as reviewing work hour estimates, to ensure the quality of data used in the model—another key practice. FPS currently uses the model to help make human capital planning and other management decisions, but NPPD and FPS have not identified time frames for updating the model since its last update in August 2013. Furthermore, FPS cannot assure data quality in future updates to the model because it has no documented process for ensuring data quality. Without time frames for updating the model and guidance on ensuring data quality, NPPD and FPS may not have accurate estimates of staffing needs to make management decisions.

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### Abbreviations

ABC	Activity-Based Costing
DHS	Department of Homeland Security
DOJ	Department of Justice
FPS	Federal Protective Service
FSL	facility security level
FTE	full-time equivalent
GFS	Government Facilities Sector
GSA	General Services Administration
<i>HCAAF</i>	<i>Human Capital Assessment and Accountability Framework</i>
ISC	Interagency Security Committee
MIST	Modified Infrastructure Survey Tool
<i>NIPP</i>	<i>National Infrastructure Protection Plan</i>
NPPD	National Protection and Programs Directorate
OPM	Office of Personnel Management
PSO	Protective Security Officer
SEDI	Homeland Security Systems Engineering and Development Institute
VRA	Veterans Recruitment Appointment

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March 24, 2016

The Honorable John Hoeven  
Chairman  
The Honorable Jeanne Shaheen  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
United States Senate

The Honorable John Carter  
Chairman  
The Honorable Lucille Roybal-Allard  
Ranking Member  
Subcommittee on Homeland Security  
Committee on Appropriations  
House of Representatives

The federal security workforce plays a crucial role in meeting the growing challenges of protecting federal facilities and their occupants from terrorist attacks and other violent acts. The Department of Homeland Security's (DHS) Federal Protective Service (FPS)—a component of the National Protection and Programs Directorate (NPPD)—has primary responsibility for protecting about 9,500 federal facilities from such threats. Through its federal security workforce, FPS provides facility security services that include law enforcement, security, and emergency response. Our prior work found that FPS faces several workforce-related challenges, such as managing and addressing its current and future workforce needs.<sup>1</sup> To address these and other challenges, we recommended, and Congress directed,<sup>2</sup> FPS to develop a strategic human capital plan to help agency leaders effectively use its federal security workforce to carry out its mission of protecting federal facilities. FPS issued a final *Strategic Human*

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<sup>1</sup>GAO, *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, [GAO-10-802R](#) (Washington, D.C.: Jun 14, 2010) and *Homeland Security: Federal Protective Service Should Improve Human Capital Planning and Better Communicate with Tenants*, [GAO-09-749](#) (Washington, D.C.: Jul 30, 2009).

<sup>2</sup>Pub. L. No. 113-76, 128 Stat. 5, 260 (2014).

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*Capital Plan* (the *Plan*) in February 2015. FPS also developed a staffing model, which identified the number and composition of the federal security workforce needed to meet its mission.

A Senate Appropriations Committee report,<sup>3</sup> which accompanied the Department of Homeland Security Appropriations Act, 2015,<sup>4</sup> included a provision for us to evaluate the *Plan*. The committee also asked us to evaluate FPS's staffing model. This report examines: (1) whether FPS's *Plan* and related human capital planning efforts align with key strategic workforce-planning principles and (2) how FPS designed and uses its staffing model to help ensure that it has the workforce it needs to meet its mission.

To address both objectives, we reviewed relevant laws and regulations, FPS and DHS documents, and our prior work related to workforce planning and human capital management. We interviewed or obtained information from officials at FPS headquarters and three selected regions,<sup>5</sup> NPPD, and the General Services Administration (GSA).<sup>6</sup> To examine whether FPS's *Plan* and related human capital planning efforts align with key strategic workforce-planning principles, we reviewed and assessed FPS's fiscal year 2015 *Plan* and related efforts against five key strategic workforce-planning principles.<sup>7</sup> We obtained these principles from our 2003 report on key principles for effective strategic workforce

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<sup>3</sup>S. Rep. No. 113-198 at 107 (2014).

<sup>4</sup>Pub. L. No. 114-4, 129 Stat. 39 (2015).

<sup>5</sup>We judgmentally selected 3 out of 11 FPS regions—Regions 7 (Greater Southwest Region), 10 (Northwest/Arctic Region), and 11 (National Capital Region). These regions include a range in the number of FPS-protected facilities, full-time equivalent (FTE) employees, the number of facilities per FTE, and geographic size, among other factors.

<sup>6</sup>The majority of federal facilities FPS protects are held or leased by GSA.

<sup>7</sup>The five key principles are: 1) involve top management, employees, and other stakeholders in developing, communicating, and implementing a strategic workforce plan; 2) determine the critical skills and competencies that employees will need to achieve current and future programmatic results; 3) develop strategies tailored to address gaps, human capital needs, and critical skills and competencies that need attention; 4) build the organizational capability needed to support human capital strategies; and 5) develop performance measures to monitor and evaluate an agency's progress toward its human capital goals and the contribution of its human capital activities toward achieving its agency goals.

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planning.<sup>8</sup> We compared these principles with guidelines in the Office of Personnel Management's (OPM) *Human Capital Assessment and Accountability Framework (HCAAF)*<sup>9</sup> that apply across federal agencies and determined that the principles we developed are generally consistent with OPM's guidelines. We did not assess the effectiveness of the *Plan* because FPS is still in the process of implementing it. To assess the design of FPS's staffing model, we reviewed FPS's August 2013 model (the latest available) and interviewed FPS officials to better understand the process they followed to design the model and how they collected data used in the model. We evaluated FPS's design of the model using standards for internal control in the federal government, guidance we published in 2009 on assessing the reliability of computer-processed data,<sup>10</sup> and four key practices we identified on the design of staffing models.<sup>11</sup> We identified the key practices from our previous reports that discussed staffing models,<sup>12</sup> discussions with a physical security industry association, and staff within our agency with workforce-planning expertise. We also assessed the reliability of data FPS used in the staffing model by reviewing available documentation, interviewing agency officials knowledgeable about the data, and examining data entries in the

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<sup>8</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003). This 2003 report identified the key principles for effective strategic workforce planning based on our prior body of work on strategic workforce planning, a review of studies by leading workforce-planning organizations, and interviews with officials from the Office of Personnel Management and other federal agencies.

<sup>9</sup>Office of Personnel Management (OPM), *The Human Capital Assessment and Accountability Framework (HCAAF)* (March 2006). We also reviewed an OPM final rule to implement regulations pertaining to *Human Resource Management in Agencies* (73 Fed. Reg. 23012 (Apr. 28, 2008) (codified at 5 C.F.R. Part 250)) and OPM's HCAAF Practitioners' Guide (September 2005).

<sup>10</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999), *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: Sept. 2014), and *Assessing the Reliability of Computer-Processed Data*, [GAO-09-365G](#) (Washington, D.C.: February 2009).

<sup>11</sup>The four key practices are: 1) incorporating work activities, frequency, and time required to conduct them; 2) incorporating risk factors; 3) involving key stakeholders; and 4) ensuring data quality to provide assurance that staffing estimates produced from the model are reliable.

<sup>12</sup>For example, see [GAO-10-802R](#) and GAO, *DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models*, [GAO-13-92](#) (Washington, D.C.: Dec. 14, 2012).

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model for obvious errors in accuracy and completeness. We could not determine the reliability of data used in the model as FPS did not provide us with documentation on steps taken to ensure data quality, which is a key practice discussed more fully in the report. Finally, to examine how FPS uses its staffing model, we reviewed FPS's staffing analysis documents to understand FPS's staffing levels and interviewed FPS headquarter officials. We evaluated FPS's use of the staffing model using standards for internal control in the federal government and associated guidance.<sup>13</sup> We did not review the size and composition of FPS's workforce of Protective Security Officers (PSO) (i.e., contract guards) because FPS did not include PSOs in its staffing model.<sup>14</sup> See appendix I for more details on our scope and methodology.

We conducted this performance audit from May 2015 to March 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

As the primary federal agency responsible for providing security services to about 9,500 federal facilities (a majority of which are GSA-held<sup>15</sup> or leased), FPS, among other things, enforces federal laws and regulations aimed at protecting federal properties and the persons on such property and investigates offenses against these buildings and persons. In conducting its mission, the agency provides two types of activities: (1) physical security and (2) law enforcement activities. As part of its physical security activities, the FPS workforce conducts facility security assessments,<sup>16</sup> which consist of identifying and assessing threats to and

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<sup>13</sup>GAO/AIMD-00-21.3.1, GAO-14-704G, and GAO, *Internal Control Management and Evaluation Tool*, GAO-01-1008G (Washington D.C.: August 2001).

<sup>14</sup>We also did not verify whether the staffing model identified the optimal workforce FPS needs to effectively carry out its mission.

<sup>15</sup>GSA-held facilities are federally-owned facilities under the custody and control of GSA.

<sup>16</sup>The frequency with which FPS conducts facility security assessments is based on a facility's security level. Non-military federal facilities are assigned a facility security level on a scale of 1 to 5, with 1 representing the lowest risk level and 5 representing the highest.



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vulnerabilities of a facility, as well as identifying countermeasures (e.g., security equipment) best suited to secure the facility. The agency's law enforcement activities include proactively patrolling facilities, responding to incidents, and conducting criminal investigations, among other things. (See app. II for a list of activities FPS performs).

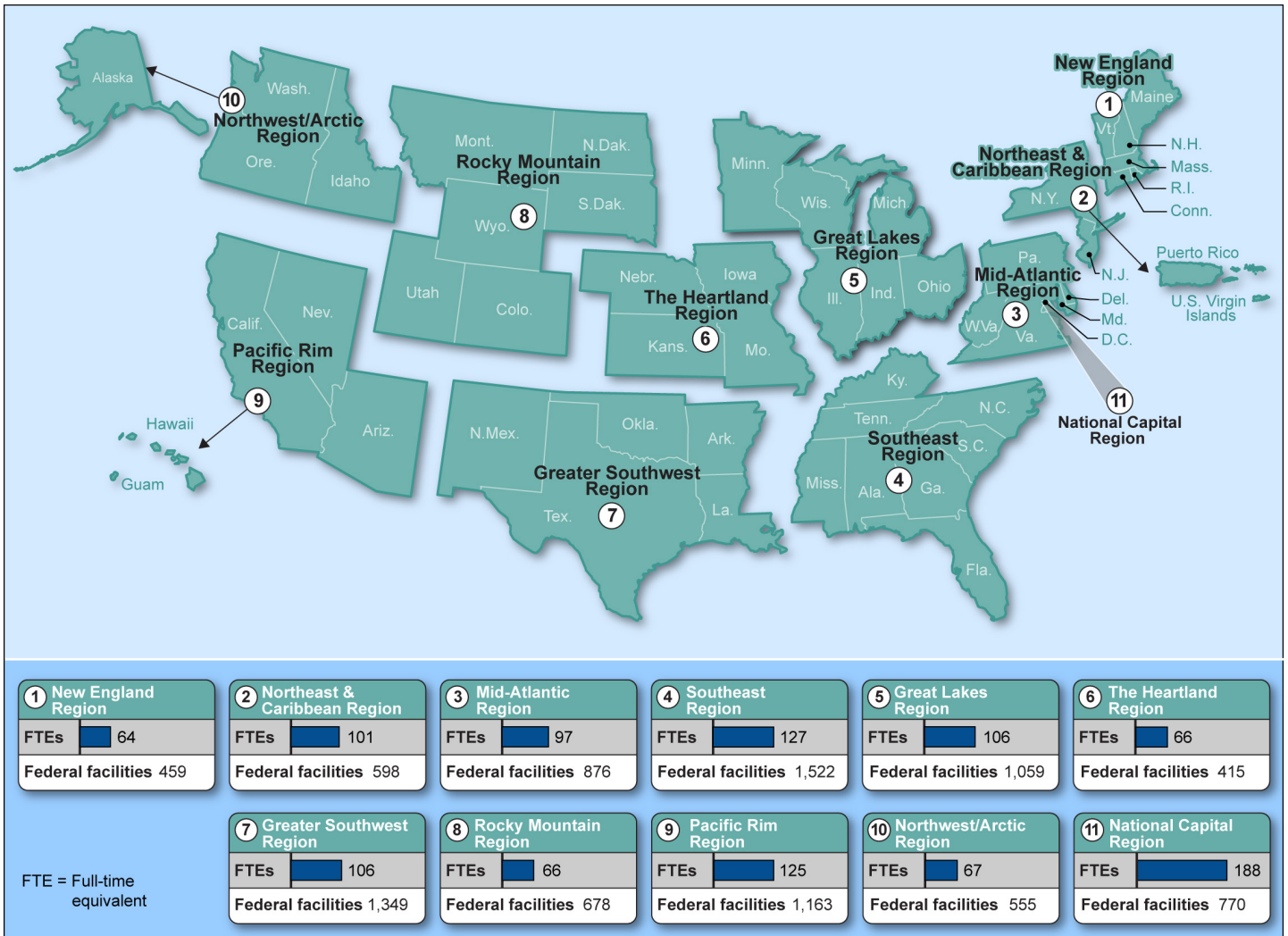
To carry out these activities in fiscal year 2015, FPS maintained a workforce of 1,371 full-time equivalents (FTEs) at its headquarters and in its 11 geographic regions (see fig. 1 below).<sup>17</sup> FPS's *Plan* and staffing model focus on this federal workforce. This workforce consists of 1,007 law enforcement staff (inspectors, criminal investigators, and special agents) performing physical security and law enforcement activities and 364 non-law enforcement staff providing mission support. FPS also manages and oversees approximately 13,500 PSOs (i.e., contract guards) posted at federal facilities. These PSOs have responsibility for controlling access to facilities; conducting screening at access points to prevent the entry of prohibited items, such as weapons and explosives; responding to emergency situations involving facility safety and security; and performing other duties.<sup>18</sup>

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<sup>17</sup>For each of the fiscal years 2012-2014, appropriations act provisions required FPS to maintain "not fewer than 1,371 full-time equivalent staff." Pub. L. No. 112-74, 125 Stat. 786, 958 (2011); Pub. L. No. 113-6, 127 Stat. 198, 355 (2013); Pub. L. No. 113-76, 128 Stat. 5, 259 (2014).

<sup>18</sup>According to an FPS official, the approach to staffing PSOs differs from staffing the FPS federal security workforce because the PSOs are a contracted security workforce.

**Figure 1: Number of Federal Protective Service (FPS) Staff and FPS-Protected Federal Facilities, by Region (as of Fiscal Year 2015)**



Sources: GAO analysis of Federal Protective Service (FPS) data; Map Resources (map). | GAO-16-384

Notes: The number of federal facilities includes facilities held or leased by the General Services Administration and other federal agencies. In addition to staff in its 11 geographic regions, FPS also maintains 258 FTEs in its headquarters facilities. FPS staff manage and oversee approximately 13,500 Protective Security Officers (i.e., contract guards) who provide security services at the federal facilities.

FPS funds its operations by collecting security fees from federal agencies that use FPS for facility protection. FPS collects a basic security fee of \$0.74 per square foot and an oversight fee to fund FPS for direct and indirect costs associated with providing building- or agency-specific

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security. The oversight fee is an additional 6 percent of the costs for providing security services to a building or agency. FPS anticipates collecting about \$336.5 million in operating revenues from security fees charged to federal agencies in fiscal year 2016.<sup>19</sup>

Over the years, we have reported on FPS's workforce-planning efforts and challenges. For instance, in July 2009, we found that FPS faced challenges with hiring and training new staff and did not have a strategic human capital plan to guide its workforce-planning efforts.<sup>20</sup> We recommended that FPS take a strategic approach to managing its staffing resources, including developing a human capital plan to better manage its workforce needs. In October 2012, FPS implemented our recommendation and issued an *Interim Strategic Human Capital Plan*. In June 2010, we also identified several potential challenges that FPS may face with obtaining the staffing needed to adequately protect federal facilities, including funding challenges, difficulties in hiring inspectors, and training backlogs.<sup>21</sup>

Since 2011, Congress has required FPS to submit a strategic human capital plan that aligns fee collections to workforce requirements based on current threat assessments.<sup>22</sup> To meet this requirement, FPS tasked DHS's Homeland Security Systems Engineering and Development Institute (SEDI) to analyze FPS's current organizational structure, position allocations, and assignments of personnel to help prepare a strategic human capital plan. In April 2012, SEDI developed a staffing model to estimate the size and composition of the workforce FPS needs to meet its

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<sup>19</sup>In addition to the basic security fee and oversight fees, FPS also charges federal agencies building-specific security and reimbursable agency-specific security fees. The revenues from these fees fund the implementation and maintenance of security services in a building or for an agency and do not contribute to FPS's operating revenues.

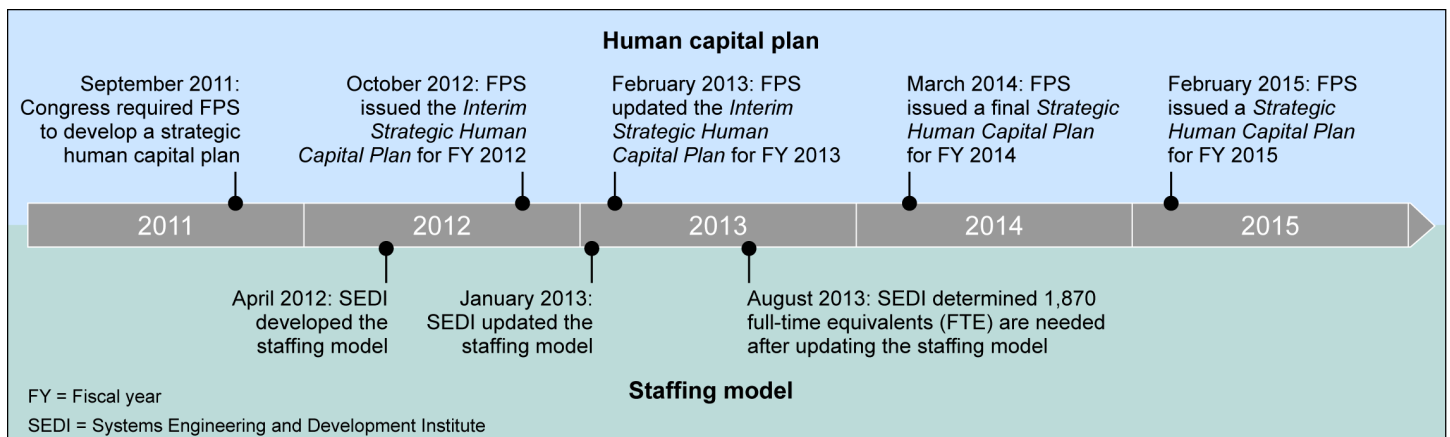
<sup>20</sup>GAO, *Homeland Security: Federal Protective Service Should Improve Human Capital Planning and Better Communicate with Tenants*, [GAO-09-749](#) (Washington, D.C.: July 30, 2009).

<sup>21</sup>GAO, *Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, [GAO-10-802R](#) (Washington, D.C.: June 14, 2010).

<sup>22</sup>Consolidated Appropriations Act, 2012, (Pub. L. No. 112-74, 125 Stat. 786, 958 (2011)); Consolidated and Further Continuing Appropriations Act, 2013, (Pub. L. No. 113-6, 127 Stat. 198, 355-56 (2013)); and Consolidated Appropriations Act, 2014 (Pub. L. No. 113-76, 128 Stat. 5, 260 (2014)); Department of Homeland Security Appropriations Act, 2015 (Pub. L. No. 114-4, 129 Stat. 39, 52 (2015)).

facility protection mission.<sup>23</sup> SEDI also helped develop FPS's *Plan*, which identifies human capital strategies FPS intends to implement. The *Plan* states that the strategies will help the agency hire and retain people with the skills needed to carry out its mission. Since 2012, FPS has updated the staffing model and the *Plan* several times (see fig. 2). FPS last updated the staffing model in August 2013 and the *Plan* in February 2015.

**Figure 2: Timeline of Federal Protective Service's (FPS) Development of Staffing Model and Human Capital Plan, 2011–2015**



Source: GAO analysis of Federal Protective Service (FPS) data. | GAO-16-384

As FPS's parent organization, NPPD has responsibility for managing and overseeing FPS's human capital efforts.<sup>24</sup> For example, NPPD has responsibility for recruiting and hiring FPS employees and providing guidance on other human capital services, such as training. In August 2015, NPPD proposed restructuring its organization to improve its management and operations. In December 2015, NPPD finalized a *Human Capital Strategic Plan* for fiscal years 2016 through 2020, which identified the overarching human capital goals and objectives for all

<sup>23</sup>The staffing model does not estimate the size and composition of PSOs.

<sup>24</sup>In 2011, NPPD received delegated examining authority from DHS's Office of the Chief Human Capital Officer. Delegated examining authority is an authority that allows federal agencies to fill competitive civil service jobs. Federal executive agencies with delegated examining authority are subject to civil service laws and regulations to ensure fair and open competition, recruitment from all segments of society, and selection on the basis of the applicants' competencies or knowledge, skills, and abilities. See 5 U.S.C. § 2301.

NPPD component agencies, including FPS. In January 2016, NPPD also finalized a complementary operational plan that provides a road map of the actions NPPD plans to take in fiscal year 2016 to meet the goals established in its human capital plan.

## FPS's Human Capital Plan and Related Efforts Generally Align with Most Key Principles, but FPS Has Not Fully Developed Performance Measures to Evaluate Progress

FPS's *Plan* and related human capital planning efforts generally align with four of the five key principles for strategic workforce planning that we identified. Specifically, we found that FPS developed its *Plan* consistent with the first four principles described in table 1 below. FPS's efforts to develop the *Plan* and take the actions described in table 1 show a marked improvement from 2009 when we found that that FPS did not have a human capital plan.<sup>25</sup> However, in this review we found that FPS has not fully developed its human capital performance measures, which is the fifth key principle for strategic workforce planning. In our 2003 report on key principles for strategic workforce planning, we found that federal agencies' use of all five key principles can contribute to effective strategic workforce planning.<sup>26</sup> FPS officials told us that they intend to further develop performance measures in the future. They also told us that they are in the process of implementing the *Plan* and continue to review and refine strategies described in the *Plan* to meet the agency's needs as they change.

### What is strategic workforce planning?

Strategic workforce planning, also called human capital planning, is a systematic process that focuses on developing long-term strategies for acquiring, developing, and retaining an organization's workforce to meet its mission. Agencies may outline strategies—the programs, policies, and processes that agencies use to build and sustain their workforces—in a human capital plan or through other human capital planning efforts.

Source: GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, GAO-04-39 (Washington, D.C.: Dec. 11, 2003). | GAO-16-384

**Table 1: Key Strategic Workforce-Planning Principles and the Federal Protective Service's (FPS) Human Capital Planning Efforts Compared to These Principles**

Key strategic workforce-planning principle	FPS's related human capital planning efforts
Involve top management, employees, and other stakeholders in developing, communicating, and implementing a strategic workforce plan.	FPS involved FPS senior executives and employees and NPPD officials when developing and implementing the <i>Plan</i> and related efforts. FPS also solicits feedback from external stakeholders on FPS's services, which, according to FPS officials, help inform the contents of the <i>Plan</i> .
Determine the critical skills and competencies that employees need to achieve current and future programmatic results.	FPS identified its staff's needed skills and competencies in several documents, including performance work plans, a career and development guide, and position descriptions. FPS continues to finalize some of these documents.

<sup>25</sup> [GAO-09-749](#).

<sup>26</sup> [GAO-04-39](#).

Key strategic workforce-planning principle	FPS's related human capital planning efforts
Develop strategies tailored to address gaps, human capital needs, and critical skills and competencies that need attention.	FPS identified several human capital strategies in its <i>Plan</i> , such as hiring and training strategies. For example, as a part of its recruiting strategy, FPS plans to leverage external and internal partnerships to attract talent. FPS has taken steps to tailor its strategies to address gaps and human capital needs, and plans to further refine some strategies to address skills and competencies that need attention.
Build the organizational capability needed to support human capital strategies.	FPS identified actions that build the organizational capabilities needed to support the agency's human capital strategies. For example, the <i>Plan</i> states that FPS intends to educate its staff on new human capital strategies and issue guidelines.
Develop performance measures to monitor and evaluate an agency's progress toward its human capital goals and the contribution of its human capital activities toward achieving its agency goals.	The <i>Plan</i> identified some, but not all, human capital performance measures. Additionally, FPS did not develop targets for the identified measures nor explicitly show how they are linked to its human capital goals.

Source: GAO analysis of FPS information. | GAO-16-384

## FPS Involved Key Stakeholders

FPS sought input from key stakeholders when it developed and implemented the *Plan* and its human capital strategies. As noted in our 2003 report, involving top management can help set the overall direction of the agency's workforce planning and soliciting employee input on workforce planning can help an agency better understand human capital needs and identify ways to improve human capital strategies.<sup>27</sup>

We found that FPS solicited input from its management and employees, NPPD, and external stakeholders. This input helped inform the *Plan's* contents.

- **FPS management and employees:** FPS officials provided several examples of how FPS senior executives and employees provided input into the Plan. For example, the officials said that the senior executives set the strategic direction for FPS's Plan and related efforts. Furthermore, the senior executives meet regularly to discuss

<sup>27</sup> [GAO-04-39](#).

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broad human capital issues, such as actions the agency can take to ensure that its workforce can address future needs. In addition, FPS officials said that they administered surveys, held working groups, and conducted interviews with their employees to identify specific human capital issues, which helped shape the contents of the Plan. For example, FPS established working groups to help develop employee performance work plans. As discussed below, these performance work plans identify critical core competencies and associated performance standards for each position. These working groups consisted of regional directors, area commanders, and other regional staff.<sup>28</sup> Furthermore, the *Plan* states that FPS intends to continue to involve employees and obtain their feedback as the agency implements the *Plan*.

- ***NPPD***: NPPD is responsible for providing human capital services (e.g., recruiting, hiring) on behalf of FPS. FPS obtained input from NPPD when developing and implementing the *Plan* and its related efforts. For example, FPS and NPPD officials explained that NPPD officials participated in various working groups to develop strategies identified in the *Plan*.
- ***External stakeholders***: While FPS officials told us they did not directly solicit input from any external stakeholder on the *Plan*, officials said they solicit feedback from these stakeholders on FPS's services, which they used to inform the contents of the *Plan*. FPS interacts with a number of external stakeholders. For example, FPS is responsible for protecting all GSA-held or leased facilities, making GSA a key customer and important stakeholder. According to FPS officials, FPS interacts with GSA to ensure a coordinated effort for the protection of federal facilities. According to officials, FPS also works closely with entities such as the U.S. Marshals Service and Administrative Office of the U.S. Courts to provide coordinated protection at U.S. courthouses and the Social Security Administration to understand the threat environment and additional protection measures that can mitigate incidents. FPS officials told us that they solicit stakeholder feedback through continuous discussions and annual surveys on the services FPS provides.

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<sup>28</sup>Each FPS region is led by a Regional Director and has a number of operational districts. The districts are headed by a District Commander, and a number of area commanders reporting to each District Commander.



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## FPS Continues to Identify and Document the Critical Skills and Competencies for Its Positions

FPS has identified and standardized skills and competencies its staff need to carry out its activities and continues to work on developing this area. According to our 2003 report, determining an agency's critical skills and competencies is essential to ensure that employees have the necessary skill sets to meet the agency's needs.<sup>29</sup> FPS has identified needed skills and competencies in the documents described below. FPS continues to finalize some of these documents.

- ***Performance work plans:*** FPS officials told us that in fiscal year 2015, they standardized performance work plans for the majority of its mission critical positions, such as inspectors and area commanders. These plans identify critical core competencies and associated performance standards for each position. For example, the core competencies for an inspector include skills in customer service (e.g., working with the GSA to understand its needs), representing the agency, and teamwork and cooperation, as well as technical proficiency. FPS uses the competencies in these work plans to systematically assess employees' performance. Officials told us that they have efforts in progress to complete the performance work plans for other mission-critical and support positions.
- ***Career and professional development guide:*** FPS plans to complete a career and professional development guide, which it expects to finalize in 2016, describing position-specific competencies, skills, and tasks. FPS officials explained that the guide aims to help FPS direct and track employee training—including required annual training—and professional development to improve employee performance.
- ***Position descriptions:*** FPS developed position descriptions for its employees to clarify the role of specific positions, by listing the major job duties, skills, and other requirements (e.g., security clearance) needed for the position. For example, according to the position description for the criminal investigator position, the duties of a senior-level investigator include conducting complex investigations that require extensive coordination and planning. According to the *Plan*, FPS intends to update the position descriptions. FPS officials told us that they regularly work with NPPD to update the position descriptions so that they reflect changes to position responsibilities and requirements.

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<sup>29</sup> [GAO-04-39](#).



## FPS Developed Human Capital Strategies Tailored to Address Gaps and Needs

### How did the Federal Protective Service (FPS) organize the human capital strategies described in its *Strategic Human Capital Plan*?

FPS's *Strategic Human Capital Plan* (the *Plan*) organized its human capital strategies into five broad categories, which are the same categories described in the Office of Personnel Management's *Human Capital Assessment and Accountability Framework*. Each category contains several strategies, some of which are described below.

Categories	Examples of strategies
1. Strategic alignment	Develop and update the <i>Plan</i> to support goals and strategies
2. Leadership and knowledge management	Produce career development plan for employees to facilitate leadership development
3. Talent management	Recruit, train, and inspire and retain employees
4. Results-oriented performance culture	Develop an employee performance appraisal system
5. Accountability	Provide effective oversight and continuous reviews to guide human capital decisions

Source: GAO analysis of FPS's fiscal year 2015 *Strategic Human Capital Plan*. | GAO-16-384

FPS's *Plan* describes five categories, each of which contains several human capital strategies (i.e., programs, policies, and processes) (see sidebar). According to the *Plan*, the strategies will help FPS build and sustain a workforce that can carry out its mission. For example, under the talent management category and related recruiting and hiring strategies, the *Plan* states that FPS intended to hire 109 employees in fiscal year 2015.<sup>30</sup> The *Plan* also states that in addition to conducting recruitment fairs, FPS intends to make its recruiting strategy more cost-effective by leveraging internal and external partnerships to attract talent. Under the training strategy, the *Plan* describes a training program, which identifies courses that aim to equip FPS staff to assess, mitigate, and respond to current and emerging threats to federal facilities.

In addition, FPS officials provided examples of how they have tailored their strategies to address identified gaps and needs. For instance, FPS adjusted its training program based on the results of a preliminary assessment that identified gaps in training, according to FPS officials. Specifically, FPS developed leadership, physical security, contracting officer representative, and security technology courses to fill identified gaps in employee training. FPS officials told us that once they finalize and implement the performance work plans and career and professional development guide, they plan to determine whether they have agency-wide gaps in skills and competencies and further refine the training program to address these gaps. Furthermore, as discussed in greater detail later in this report, FPS considered adapting some of its human capital planning decisions based on gaps and needs identified from the staffing model and other management tools. As our 2003 report found, developing strategies tailored to address gaps, human capital needs, and critical skills and competencies that need attention helps create a road map for an agency to move from the current to the future workforce needed to achieve program goals.<sup>31</sup>

<sup>30</sup>We did not assess FPS's implementation of the *Plan*, including whether it hired 109 employees in fiscal year 2015.

<sup>31</sup>[GAO-04-39](#).

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## FPS Identified Actions That Build the Organizational Capabilities Needed to Support Human Capital Strategies

The *Plan* identified some educational and administrative actions to build the capability needed to support its human capital strategies. We noted in our 2003 report that such actions can help ensure that the strategies are effectively, consistently, and fairly implemented.<sup>32</sup> For example, the *Plan* states that FPS intends to educate employees on new human capital strategies. The *Plan* also states that FPS intends to develop tools and issue guidelines to help managers administer various strategies, such as a toolkit for managers with tips and guidance to help them retain staff.

Furthermore, FPS and regional officials also use administrative authorities that can help them carry out hiring strategies identified in the *Plan*. For example, Veterans Recruitment Appointment (VRA) authority allows federal agencies, such as FPS, to make excepted appointments of eligible veterans to specified positions without competition.<sup>33</sup> According to FPS officials, these hiring authorities help ensure that FPS can leverage various candidate pools to recruit and retain qualified personnel. An FPS regional director explained that the VRA hiring authority allowed him to fill the positions he needed in his region.

NPPD's planned reorganization aims to improve the administration of human capital efforts that support FPS. Specifically, NPPD and FPS officials explained that as a part of its reorganization, NPPD intends to place its human capital staff in FPS's headquarters office. According to this official, collocating NPPD human capital and FPS staff aims to improve the administration of recruiting and hiring because it will allow NPPD to more effectively and quickly meet FPS's human capital needs and priorities in these areas.

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## FPS Has Not Fully Developed Human Capital Performance Measures to Evaluate Progress toward Goals

FPS has taken initial steps to develop performance measures for some, but not all, strategies discussed in the *Plan*. Specifically, the *Plan* identified performance measures for strategies that fall under one of the five broad categories—talent management—FPS used to organize its strategies. See figure 3. However, FPS did not identify measures for strategies that fall under the other four broad categories, such as leadership and knowledge management and building a results-oriented performance culture. FPS officials told us that they did not identify

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<sup>32</sup>GAO-04-39.

<sup>33</sup>See 5 C.F.R. Part 307.

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performance measures beyond those related to talent management in part because they were waiting for NPPD to finalize a human capital plan that would be applicable to FPS and that would contain measures for the other categories. They also noted that, due to resource constraints, they focused more on implementing strategies described in the *Plan* than on developing additional performance measures.

Furthermore, FPS did not identify targets for the performance measures identified in the *Plan*. For example, the *Plan* identifies “quality and effectiveness of training” and “attrition rates” as measures but FPS has not identified associated targets for them. For example, FPS did not identify a desired target for the “attrition rate” measure (e.g., reduce new hires’ attrition rate by 3 percentage points over fiscal years 2017 through 2020). In our prior work, we have found that successful performance measures contain targets, which can help agency managers evaluate progress by comparing actual results to projected performance.<sup>34</sup>

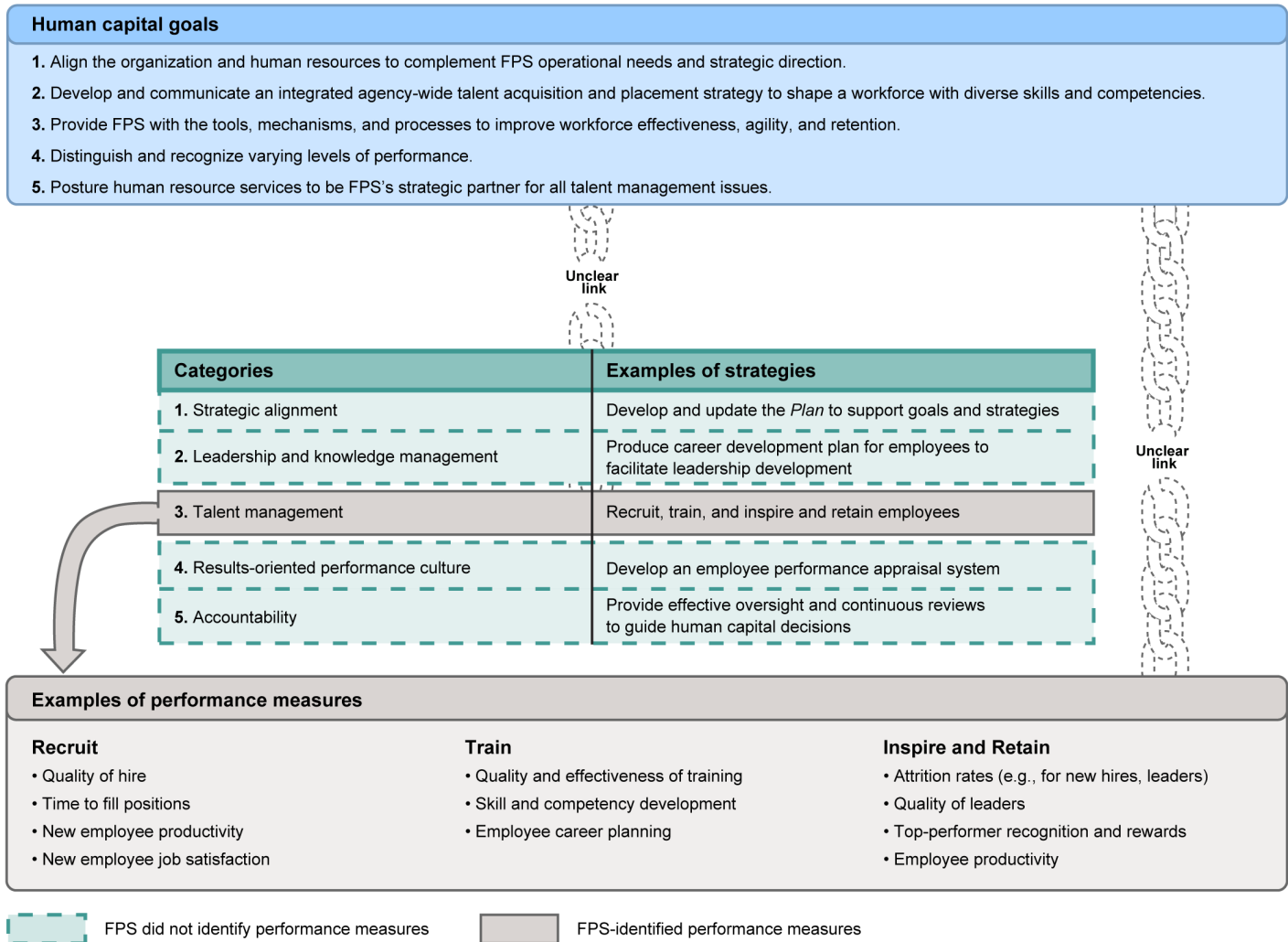
In addition, the *Plan* does not explicitly show how the performance measures and associated strategies link to FPS’s human capital goals. For example, as shown in figure 3, the *Plan* does not clearly link the “attrition rate” performance measure that is associated with FPS’s retention strategy to one or more of FPS’s five human capital goals. We have previously found that explicitly linking performance measures to goals and clearly communicating the linkage also helps make performance measures successful because the linkages can help agencies determine whether they are achieving their human capital and agency goals.<sup>35</sup>

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<sup>34</sup>In prior work, we identified nine attributes of successful performance measures—clarity, measurable targets, linkage, reliability, objectivity, government-wide priorities, core program activities, balance, and limited overlap. In this review, we analyzed the extent to which FPS’s performance measures satisfy two of these attributes—measurable targets and linkage—which we determined were most relevant to FPS’s work on developing performance measures. See, for example, GAO, *Surface Transportation: Department of Transportation Should Measure the Overall Performance and Outcomes of the TIGER Discretionary Grant Program*, [GAO-14-766](#) (Washington, D.C.: Sept. 23, 2014) and *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002).

<sup>35</sup>[GAO-14-766](#), [GAO-04-39](#), and [GAO-03-143](#).

**Figure 3: Alignment of Human Capital Goals, Categories, Strategies, and Identified Performance Measures in the Federal Protective Service’s (FPS) Fiscal Year 2015 Strategic Human Capital Plan**



Source: GAO analysis of FPS’s fiscal year 2015 Strategic Human Capital Plan. | GAO-16-384

FPS has taken some initial steps to develop targets and linkages but, as was the case with developing additional performance measures, did not complete these steps in anticipation that NPPD would finalize its own human capital plan. For example, FPS began to collect data to help identify appropriate targets and continues to work on this effort, according to officials. Additionally, when developing the *Plan*, FPS developed a draft document that shows the link between the identified performance

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measures and the agency's human capital goals. For example, FPS linked its "attrition rate" performance measure to the agency's third human capital goal, which is to provide FPS with the tools, mechanisms, and processes to improve workforce effectiveness, agility, and retention.

After the completion of our audit work in February 2016, NPPD and FPS officials provided us with NPPD's strategic human capital plan and complementary operational plan, which NPPD finalized in December 2015 and January 2016, respectively.<sup>36</sup> At this time, NPPD's plans do not include performance measures specific to FPS. An NPPD official who played a key role in developing this plan said that, in the future, an FPS operational plan that is aligned with NPPD's human capital plan and specifically reflects FPS's human capital needs and strategies will be developed. Further, NPPD and FPS officials told us that they will work together to develop human capital performance measures relevant to FPS. However, the officials' plans are not clear because they have not yet established time frames for addressing the issues we identified on performance measures.

According to our key workforce-planning principles, agencies should establish performance measures to evaluate an agency's progress toward reaching human capital goals and the contribution of human capital activities toward achieving agency goals. Establishing performance measures before an agency starts to implement its strategies can help agency officials evaluate the human capital plan.<sup>37</sup> If FPS and NPPD do not develop performance measures, including targets and linkages to goals, in a timely manner, neither agency can accurately assess FPS's progress in achieving its human capital goals or its agency goal of sustaining a valued, skilled, and agile workforce or the contribution of its strategies toward achieving these goals. Consequently, neither NPPD nor FPS will know the extent to which the *Plan* and related strategies are helping fulfill its mission of protecting federal facilities and their occupants. Furthermore, it will be difficult for stakeholders—such as Congress and the public—to hold FPS accountable for achieving its goals.

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<sup>36</sup>Department of Homeland Security, National Protection and Programs Directorate (NPPD), *Human Capital Strategic Plan FY2016-FY2020* (December 2015) and *FY16 Operations Plan* (January 2016).

<sup>37</sup>[GAO-04-39](#).

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## FPS Designed Its Staffing Model to Align with Most Key Practices and Uses It to Make Management Decisions but Has Not Documented a Process to Ensure Data Quality

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### FPS Designed Its Staffing Model Consistent with Most Key Practices

FPS issued its latest staffing model in August 2013, which identified the number and composition of FTEs the agency needs to meet its mission, based on various data inputs, assumptions, and analyses.<sup>38</sup> We compared the design of this model to four key practices we identified for the design of staffing models and found that FPS's model reflects three of these four key practices (see table 2). Specifically, we found that FPS designed its staffing model to include (1) work activities performed by FPS employees and the frequency and number of hours it takes to perform them; (2) risk factors that affect the agency's operational activities, such as the security level and quantities of facilities; and (3) input from key stakeholders. We found that while FPS officials took some steps to ensure the quality of data used in the model, they did not document a process for doing so. A staffing model that reflects all four key practices can enable FPS officials to make informed decisions on workforce planning with reliable estimates.

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<sup>38</sup>The model is one of the management tools FPS uses to inform human capital planning, according to FPS officials.

**Table 2: Key Practices for Designing Staffing Models and the Federal Protective Service’s (FPS) Staffing Model Compared to these Practices**

Key practices	Assessment of FPS’s staffing model
Incorporate work activities, frequency, and time required to conduct them.	FPS’s staffing model incorporates the work activities and associated tasks performed by FPS’s staff, including the number and frequency of activities staff conduct annually. The model also contains the number of hours FPS officials estimated it should take to perform each activity.
Incorporate risk factors.	FPS’s staffing model incorporates operational risk factors, such as the security level and quantities of facilities. For example, the staffing model incorporates annual targets for completing facility security assessments by facility security level.
Involve key stakeholders.	SEDI officials interviewed multiple officials, such as FPS headquarters and NPPD officials, and visited four regions to identify work activities and determine whether the model needed to account for potential differences in regional staffing needs.
Ensure quality of data used in the model to provide assurance that staffing estimates are reliable.	SEDI officials reviewed and revised assumptions and estimates on work hours and conditions used in previous models to better reflect FPS’s operating conditions. However, FPS officials did not document a process for ensuring the quality of data in the model.

Source: GAO analysis of FPS information. | GAO-16-384

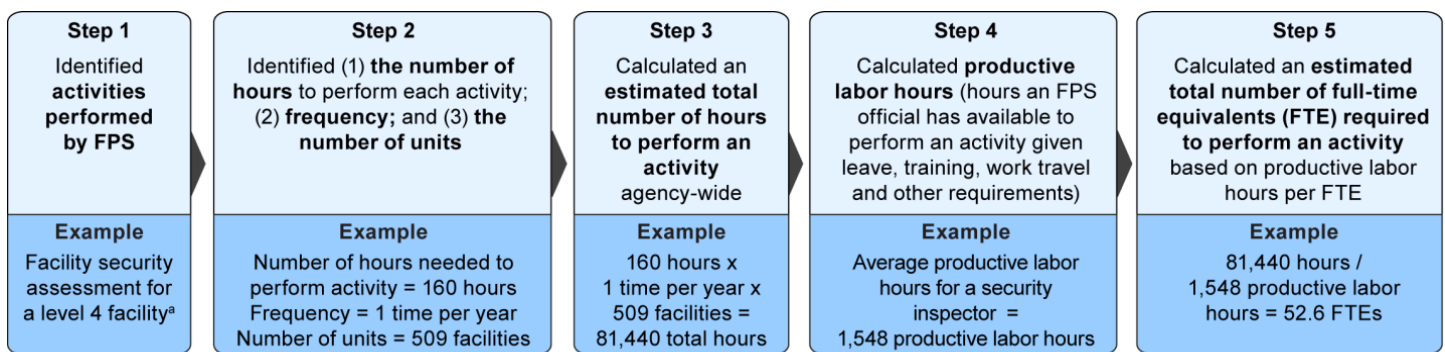
- Work activities, frequency, and time required to conduct work activities:*** We found that FPS’s staffing model includes data commonly used in workforce analyses, such as data on work activities, and the frequency and number of hours to perform them. Incorporating these types of data into the staffing model helps estimate the number of staff needed to carry out an agency’s activities, according to a key practice we identified. SEDI officials reviewed documentation (e.g., relevant laws and regulations, FPS policies) to identify all FPS mission and mission support activities (referred to as an activities taxonomy)—and the frequency with which the identified activities are performed. SEDI officials identified about 200 total activities and associated tasks. As discussed in detail below, SEDI officials consulted with key stakeholders to estimate the required time to perform all mission-related work activities. SEDI officials used information provided by these stakeholders because time constraints precluded it from conducting real-time studies, according to an FPS official. SEDI officials also calculated average productive labor hours to populate the staffing model (1,548 hours for non-supervisory physical security inspectors and 1,987 hours for criminal investigators) based on assumptions about staff’s annual leave, sick leave, training requirements,<sup>39</sup> travel (for training), and time devoted to other tasks (e.g., collateral duties). For instance, the productive labor hours used

<sup>39</sup>FPS staff are required to take various types of training, such as on firearms, active shooter situations, and physical security.

in the model assumes that staff on average use 50 percent of their sick leave each year.

To estimate the number of staff FPS needed in fiscal year 2013 (1,870 FTEs), SEDI officials used the data discussed above to calculate the estimated total number of FTEs required to perform each activity. Figure 4 provides an example of the steps taken to calculate the FTEs needed for one activity—conducting security assessments at a level 4 facility. SEDI officials then aggregated the FTEs for each activity to identify the total estimated FTEs that FPS needs to carry out its mission.

**Figure 4: Steps Taken to Calculate the Full-Time Equivalents (FTEs) for an Example Activity**



Source: GAO analysis of Federal Protective Service (FPS) August 2013 staffing model and related documentation. | GAO-16-384

<sup>a</sup>Non-military federal facilities are assigned a facility security level (FSL) on a scale of 1 to 5, with 1 representing the lowest risk level and 5 representing the highest.

- **Risk factors:** FPS officials incorporated operational risk factors in its model, including the different security levels of federal facilities.<sup>40</sup> We previously found that commonly used industry practices for staffing models specific to law enforcement and physical security include identifying operational risk factors, such as the security level of facilities and posts to be secured or protected and identifying tasks and time it takes to conduct those activities.<sup>41</sup> A federal facility's security risk level determines the frequency with which FPS must

<sup>40</sup>SEDI officials had also identified and considered including human capital risk factors, such as attrition rate, in the model; however, FPS officials told us that the attrition rate was not necessary to estimate the number of staff needed.

<sup>41</sup>GAO-10-802R.



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complete a facility's security assessment. The model includes annual targets for completing facility security assessments by facility security level. For example, FPS officials estimated that it would complete 509 facility security assessments for security-level 4 federal facilities in fiscal year 2013 and included these data in the model. In identifying key practices for the design of staffing models, we found that accounting for these operational risk factors helps determine the number of staff and positions needed to mitigate potential threats to federal facilities.<sup>42</sup>

- ***Key stakeholders:*** In designing the model, SEDI officials consulted with key stakeholders and subject-matter experts, including FPS headquarters officials,<sup>43</sup> and some regional directors and managers<sup>44</sup>. According to an official, SEDI relied on the subject matter experts to estimate the number of hours it should take to perform FPS operational activities. A SEDI official also told us that they used these experts because FPS staff perform unique activities and therefore, no benchmarks exist for how long it takes to perform many of the work activities, such as facility security assessments.<sup>45</sup> FPS officials also told us that they involved NPPD human capital officials to help identify assumptions, such as leave estimates, that were used to calculate productive labor hours. We have previously found that involving stakeholders and subject matter experts when designing a staffing model can help an agency ensure that the model reflects operating conditions and meets user needs.<sup>46</sup>
- ***Data quality:*** FPS officials took steps to ensure the quality of the data used in the model. We have defined data quality as the use of relevant data from reliable internal and/or external sources based on

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<sup>42</sup>[GAO-10-802R](#).

<sup>43</sup>According to a SEDI official, the headquarters officials were FPS division directors located in headquarters, who have also worked in the regions and are familiar with how long activities typically take to perform.

<sup>44</sup>SEDI selected and visited four FPS regional office locations: Region 5 (Chicago), Region 6 (Kansas City), Region 9 (Los Angeles), and Region 10 (Seattle).

<sup>45</sup>A SEDI official also noted that FPS work activities are not observable in one setting—that is, FPS staff perform work activities in multiple settings and at different times.

<sup>46</sup>GAO, *DOJ Workforce Planning: Grant-making Components Should Enhance the Utility of Their Staffing Models*, [GAO-13-92](#) (Washington, D.C.: Dec. 14, 2012).

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the identified information requirements.<sup>47</sup> To help ensure data quality, FPS officials told us that SEDI officials questioned subject matter experts to obtain work activity hour estimates for performing some work activities and to understand what the estimates included and then revised them as needed to improve precision. For example, if subject matter experts included travel time as part of the estimated time to perform a facility security assessment, then SEDI officials excluded the travel time from the original estimate and made it a separate work activity with estimated time for completing it. Additionally, FPS officials told us that they compared some work activity hour estimates from the staffing model to the actual number of hours it takes FPS staff to perform those activities from their Activity-Based Costing Model<sup>48</sup> to identify differences and make corrections, when needed, to reflect actual conditions. Further, FPS officials told us that they regularly reviewed and provided feedback on SEDI's taxonomy and other data collection efforts to identify all FPS work activities and estimated work hours as well as the underlying assumptions used to develop some estimates, such as assumptions related to productive labor hours. A SEDI official also told us that FPS Operations and some regional officials reviewed the estimated hours required to complete some work activities in the staffing model.

Although FPS officials took some steps to ensure the quality of data provided by subject matter experts, they did not document the agency's process for ensuring data quality at the time FPS developed the model, and we could not assess the reliability of data used in the model. We found that some FPS staff questioned the quality and reasonableness of the data in the model, particularly on work hour estimates to complete some activities. Specifically, selected FPS regional staff we spoke with told us that some work hour estimates did not reflect their experience or actual operating conditions. For

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<sup>47</sup>Relevant data have a logical connection with, or bearing upon, the identified information requirements. Reliable internal and external sources provide data that are reasonably free from error and bias and faithfully represent what they purport to represent. Management should evaluate both internal and external sources of data for reliability. See [GAO-14-740G](#).

<sup>48</sup>The Activity-Based Costing (ABC) model is a management tool that FPS officials use to identify the actual cost of its activities. One element of the ABC model is the number of actual hours that FPS officials used to perform its activities. FPS officials developed the ABC model after it designed the staffing model, and thus, FPS officials could not use the actual time it takes to perform some work activities in the staffing model design.

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example, all nine area commanders we spoke with stated that the estimated time to complete a risk assessment of federal facilities with a facility security level 3 (about 60 hours) was low.<sup>49</sup> The area commanders said that it takes about 80 to 120 hours on average because, similar to level 4 facilities, they need to interview multiple tenants for the risk assessments. FPS headquarters officials told us that they had estimated a range of 60 to 80 hours for conducting assessments of federal facilities with a facility security level 3, depending on the number of federal agencies and clients in the federal facilities, but they used the 60-hour estimate in the model as the nationwide average time to conduct those assessments. FPS officials told us that when they update the model, they plan to validate work hour estimates they obtained from subject matter experts and use data from some new technologies, such as the Modified Infrastructure Survey Tool (MIST), to better reflect actual operating conditions.<sup>50</sup> FPS headquarters officials also told us that the training hours estimates in the model represent training requirements at the time of developing the model and that when they update the model, they plan to change the training hours used in the model to reflect changes in training requirements.

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<sup>49</sup>We interviewed nine randomly selected area commanders responsible for facility security in the three FPS regions we selected.

<sup>50</sup>MIST is a vulnerability assessment tool that allows FPS inspectors to review and document a facility's security posture, current level of protection, and recommended countermeasures. In May 2014, we found limitations with MIST as it does not incorporate consequences (the level, duration, and nature of potential loss resulting from an undesirable event) into its risk assessment methodology. See GAO, *Federal Protective Service: Protecting Federal Facilities Remains A Challenge*, [GAO-14-623T](#) (Washington, D.C., May 21, 2014). FPS officials told us that MIST has been operational since December 2014. In July 2015, the Interagency Security Committee (ISC)—an organization with DHS that, among other things, reviews agencies' vulnerability assessment tools—denied FPS's request to certify MIST as a data tool that complies with its security standards because of identified deficiencies. In November 2015, FPS officials told us that efforts are under way to address the identified deficiencies, but they did not provide time frames for completing these efforts.

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## FPS Uses Its Staffing Model to Help Make Management Decisions but Has Not Yet Updated It to Reflect Current Operating Conditions

We found that FPS uses the staffing model in conjunction with other management tools, professional judgement, and institutional knowledge to help inform human capital planning and budget requirements,<sup>51</sup> as described below.

- ***Human capital planning decisions:*** An FPS official told us that FPS uses the staffing model in conjunction with other management tools, such as the Activity-Based Costing Model, to help make staffing and human capital planning decisions. In particular, using the staffing and Activity-Based Costing models,<sup>52</sup> FPS found that inspectors spent less time than was predicted in some activities. For example, FPS officials said that FPS found that inspectors spent less time than predicted by the staffing model on overseeing countermeasures services at agencies. An official said that FPS used this information to evaluate and consider making changes to inspectors' workloads and staffing levels.
- ***Budget requirements:*** In 2014 and 2015—in response to international security events (e.g., shootings at the Canadian Parliament and in Paris)—the Secretary of DHS instructed FPS to enhance its presence and security at federal facilities for short periods of time. An FPS official told us that FPS used the model to understand the impact of the additional facility security responsibilities on its staff's daily facility-protection workload. According to the official, analyses from the staffing model, other management tools, and conversations with regional office staff, showed that FPS needed additional staff resources to maintain its law enforcement staff's daily workload while at the same time providing enhanced security operations. As a result of this analysis, in July 2015, DHS notified federal agencies that it would increase its basic security fee from \$0.74 to \$0.78 and its oversight fee from 6 percent to 8 percent in fiscal year 2017. According to a DHS memorandum sent to agencies using FPS services, the fee increases, combined with internal efficiencies, will allow the agency to sustain essential security operations and maintain

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<sup>51</sup>As previously noted, FPS's budget consists of revenues from security fees charged to federal agencies.

<sup>52</sup>As described previously, FPS compared work activity hour estimates from the staffing model to the actual number of hours it takes FPS staff to perform those activities from their Activity-Based Costing Model. The comparison allowed FPS to identify activities where FPS spent more or less than the needed number of hours to perform an activity.

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the agency's capacity to rapidly surge personnel during increasingly more common periods of heightened vulnerability in fiscal year 2017.<sup>53</sup>

While FPS continues to use the model for the purposes described above, it does not reflect some changes in FPS's operating conditions that have occurred since the model's last update in August 2013. For example, this staffing model does not reflect FPS's plan to perform about 600 more facility security assessments for level 3 and 4 facilities in fiscal year 2014 than it did in fiscal year 2013.<sup>54</sup> We calculated that if FPS updated the August 2013 model to reflect these additional facility security assessments, FPS would have needed about 37 more FTEs in fiscal year 2014, each of which would have completed an average of about 17 of the additional assessments.<sup>55</sup> FPS officials acknowledged that the number of facility security assessments it plans to complete can change and that other operating conditions, such as the number of federal facilities FPS is responsible for protecting, can change regularly. FPS's operating conditions can also change when security or agency needs change. For example, some GSA facilities are becoming more technologically advanced. To address security needs at those facilities, FPS officials told us that in conjunction with the NPPD's Office of Cybersecurity and Communications, they plan to execute more of their protection responsibilities as they relate to the nexus of cybersecurity and physical

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<sup>53</sup>We did not assess FPS's fee structure or the appropriateness of the fee increase. We previously assessed FPS's fee structure. See GAO, *Budget Issues: Better Fee Design Would Improve Federal Protective Service's and Federal Agencies' Planning and Budgeting for Security*, [GAO-11-492](#) (Washington, D.C.: May 20, 2011). We also have on-going work on the oversight and management of DHS's fee-funded programs, including FPS's program.

<sup>54</sup>The calculation on FPS's plan to perform 600 more facility security assessments was based on information provided in DHS's FY14–16 Annual Performance Report and data from the August 2013 staffing model.

<sup>55</sup>Based on the August 2013 staffing model, each FTE should have performed an average of about 14 assessments in fiscal year 2013. To calculate the number of FTEs FPS would need in fiscal year 2014, we assumed that the number of facilities and risk level did not change between fiscal year 2013 and 2014. Although FPS did not obtain the additional staff, the agency shifted priorities and, as a result, completed 93 percent of the planned facility security assessments.

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security.<sup>56</sup> Furthermore, NPPD's planned reorganization may result in changes to FPS's activities.<sup>57</sup> Separately, FPS's operations may change for an extended period of time in response to unexpected events, such as when threat levels change. As noted above, FPS officials said that while they would like to update the model to reflect changes in operations, they have not yet done so because of limited staff resources.<sup>58</sup>

However, at the completion of our audit work in February 2016, FPS officials told us that given the planned NPPD reorganization, NPPD has not yet determined whether FPS will continue to have responsibility for updating the staffing model, whether this responsibility will shift to NPPD, or whether it will become a shared responsibility. Nonetheless, FPS and NPPD have no specific time frames for updating the model. Standards for internal control in the federal government and associated guidance<sup>59</sup> state that managers need timely analytical information to help make management decisions. Furthermore, we have found in our prior work that completing staffing models and regularly updating them in a timely manner can help support agencies' activities and decision making.<sup>60</sup> Without a clear plan and time frames for updating the staffing model to reflect regular and unexpected changes in operating conditions, NPPD and FPS will have limited assurance of the accuracy of the model's estimates of the number and composition of staff FPS needs to protect federal facilities and their decisions regarding the FPS workforce.

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<sup>56</sup>In December 2014, we assessed DHS's and other stakeholders' efforts to address cyber risks in federal facilities. See GAO, *Federal Facility Cybersecurity: DHS and GSA Should Address Cyber Risk to Building and Access Control Systems*, [GAO-15-6](#) (Washington D.C., Dec. 12, 2014).

<sup>57</sup>FPS officials told us that they do not anticipate the restructuring to affect FPS's operational activities, but the reorganization is not yet final.

<sup>58</sup>In September 2013, FPS issued a vacancy announcement for a workforce planner who would be responsible for maintaining the model and subsequently filled this position, but according to FPS officials, the individual left soon after being hired.

<sup>59</sup>[GAO/AIMD-00-21.3.1](#), [GAO-14-704G](#), and [GAO-01-1008G](#).

<sup>60</sup>GAO, *Coast Guard: Timely Actions Needed to Address Risks in Using Rotational Crews*, [GAO-15-195](#) (Washington, D.C.: Mar. 6, 2015).

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## FPS Does Not Have a Documented Process for Ensuring Data Quality in Future Updates

Although FPS took steps to ensure data quality when it developed the August 2013 model, FPS does not have a documented process for ensuring data quality when it updates the model to account for changes in operating conditions in the future. As such, it is not clear whether the model will use quality data that reflect current operating conditions. Standards for internal control in the federal government and guidance we have developed on assessing the reliability of computer-processed data state that agencies should use a process to help ensure data quality.<sup>61</sup> Also, the internal control standards emphasize the importance of control activities such as procedures for achieving an entity's objectives. Documented processes on data quality—such as guidance on how to collect data, validate assumptions underlying the data, and perform sensitivity analyses<sup>62</sup> to assess the assumptions—can help ensure that data used in the model are reasonably free from error and bias and provide greater assurance to decision makers that they are using reliable and sound information that is produced from the model.<sup>63</sup> In June 2010, in making preliminary observations about FPS's workforce-planning efforts, we emphasized the importance of taking steps to ensure the quality of data used.<sup>64</sup> Because FPS officials did not document a process for assuring data quality during the development of the model and without relevant guidance, FPS may not be able to ensure that future updates to its staffing model will provide accurate estimates of staffing needs, putting FPS at risk of not fully understanding whether it has the staff it needs to perform its mission.

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## Conclusions

To carry out its mission of protecting federal facilities and their occupants against potential terrorist attacks and other violent acts, FPS must ensure that it has the right people with the right skills in the right positions, at the

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<sup>61</sup>[GAO-AIMD-00-21.3.1](#), [GAO-14-704G](#), and [GAO-09-365G](#).

<sup>62</sup>Sensitivity analyses examine the effects of changing underlying assumptions used to develop estimates. Such analyses aim to describe how much data output values are affected by changes in data input values. Carefully assessing the underlying risks and supporting data is necessary for a sensitivity analysis to be useful in making informed decisions. See GAO, *Cost Estimating and Assessment Guide: Best Practices for Developing and Managing Capital Program Costs*, [GAO-09-3SP](#) (Washington, D.C.: March 2009).

<sup>63</sup>[GAO/AIMD-00-21.3.1](#) and [GAO-14-704G](#).

<sup>64</sup>[GAO-10-802R](#).

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right time. Over the years, however, we have identified several workforce-related challenges facing FPS, such as the absence of a strategy to manage FPS's current and future workforce needs. The completion of FPS's first strategic human capital plan and staffing model, therefore, represents significant progress. Moreover, FPS's development of both the *Plan* and model largely align with recognized key workforce-planning principles and staffing model practices.

While FPS has taken a number of positive steps to strategically manage its workforce, we found that FPS does not have assurance that its efforts will achieve its stated goals. FPS has not fully developed human capital performance measures, and while both NPPD and FPS plan on taking additional action in this area, future progress is uncertain because the NPPD and FPS have not established a time frame for developing additional measures. Until FPS and NPPD develop performance measures with targets that clearly align with FPS's stated human capital goals, it will be difficult to determine whether FPS is on track to meet its goals and mission, or needs to make adjustments. Furthermore, FPS's current staffing model has not been updated since August 2013. Until FPS develops a plan and timeline for updating the model regularly and for unexpected changes in operating conditions that last for an extended period of time, FPS will have limited assurance on the model's estimates of the number of staff it needs to protect federal facilities. Finally, because FPS did not document a process for ensuring data quality when it developed the model, it is not clear whether future updates to the model will accurately reflect changes in operating conditions. Without documented guidance that describes the process FPS will use to ensure data quality, FPS may not be able to ensure that its staffing model will provide accurate estimates of staffing needs. As FPS's parent organization, NPPD has a critical role to play in managing and overseeing FPS's human capital efforts. Accordingly, NPPD and FPS need to work together to ensure that they have the staff they need to perform their facility protection mission.

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## Recommendations for Executive Action

To help FPS enhance its strategic human capital planning efforts, we recommend that the Secretary of Homeland Security direct the Under Secretary of NPPD to work with the Director of FPS to take the following three actions:

- identify time frames for developing human capital performance measures with targets that are explicitly aligned to FPS's stated human capital goals,



- 
- establish a plan and time frames for updating FPS's staffing model regularly and for unexpected changes in operating conditions, and
  - develop and document guidance on the process FPS will use to ensure the quality of its staffing model data, such as guidance on how to collect data, validate assumptions, and perform sensitivity analyses to assess the assumptions.

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## Agency Comments

We provided a draft of this report to DHS for comment. DHS concurred with our recommendations and outlined steps it plans to take to address them. DHS's written comments are reproduced in appendix III. DHS also provided technical comments, which we incorporated as appropriate.

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We are sending copies of this report to the appropriate congressional committees and the Secretary of the Department of Homeland Security. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at 202-512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov). Contact points for our Offices of Congressional Relations and Public Affairs may be found at the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Lori Rectanus  
Director, Physical Infrastructure Issues

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# Appendix I: Objectives, Scope, and Methodology

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The objectives of our report were to evaluate the Federal Protective Service's (FPS) human capital planning efforts, including its *Strategic Human Capital Plan* (the *Plan*) and staffing model. Specifically, we examined (1) whether FPS's *Plan* and related human capital planning efforts align with key strategic workforce-planning principles and (2) how FPS designed and uses its staffing model to help ensure that it has the workforce it needs to meet its mission.

To address both objectives, we reviewed relevant laws and regulations, documents from FPS and the National Protection and Programs Directorate (NPPD), and our prior work related to workforce planning and human capital management. We also interviewed or obtained information from officials at FPS, NPPD, and General Services Administration (GSA). To determine regional staff's involvement in developing the *Plan* and staffing model, we obtained information from and interviewed FPS regional directors and nine randomly selected area commanders responsible for facility security in 3 of FPS's 11 regions.<sup>1</sup> We judgmentally selected the 3 regions—Regions 7 (Greater Southwest Region), 10 (Northwest/Arctic Region), and 11 (National Capital Region)—to obtain variation in the number of FPS-protected facilities and full-time equivalent (FTE) employees; the number of facilities per FTE; geographic size (in terms of square miles); number of square miles per facility in the region; geographic location (i.e., east, central, and west locations); and whether DHS's Homeland Security Systems Engineering and Development Institute (SEDI) visited the region when it developed the staffing model. Because we judgmentally selected the FPS regions, our results are not generalizable to all of FPS. We also interviewed an official from the Federal Law Enforcement Officers Association, which is a nonprofit professional association representing federal law enforcement officers, and the International Association of Chiefs of Police to obtain their perspective on workforce planning and staffing models.

To examine whether FPS's *Plan* and related human capital planning efforts align with key strategic workforce-planning principles, we reviewed and assessed FPS's fiscal year 2015 *Plan* and related efforts against five

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<sup>1</sup>Each FPS region has a number of operational districts, headed by a District Commander, and a number of area commanders reporting to each District Commander. We interviewed area commanders as they are responsible for supervising inspectors, who perform law enforcement and physical security activities at federal facilities.

key strategic workforce-planning principles. The five key principles include:

1. involving top management, employees, and other stakeholders in developing, communicating, and implementing a strategic workforce plan;
2. determining critical skills and competencies needed for employees;
3. developing strategies tailored to address gaps and needs;
4. building the organizational capability needed to support human capital strategies; and
5. developing performance measures to evaluate progress toward reaching human capital or agency goals.

We obtained these principles from our 2003 report on key principles for effective strategic workforce planning.<sup>2</sup> We compared these principles with guidelines in the Office of Personnel Management's (OPM) *Human Capital Assessment and Accountability Framework (HCAAF)*<sup>3</sup> that apply across the federal government and determined that the principles we developed are generally consistent with OPM's guidelines. FPS officials also told us that they based their *Plan* on the HCAAF guidelines. The five key strategic workforce-planning principles can enhance the effectiveness of an agency's strategic workforce-planning and can help ensure that its strategic workforce-planning process appropriately addresses an agency's human capital challenges, goals, and mission. We also conducted interviews with FPS officials to obtain information on whether FPS's *Plan* and related human capital planning efforts addressed key strategic workforce-planning principles. We interviewed an NPPD official

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<sup>2</sup>GAO, *Human Capital: Key Principles for Effective Strategic Workforce Planning*, [GAO-04-39](#) (Washington, D.C.: Dec. 11, 2003). This 2003 report identified the key principles for effective strategic workforce planning based on our prior body of work on strategic workforce planning, a review of studies by leading workforce-planning organizations, and interviews with officials from the Office of Personnel Management and other federal agencies. Although we developed these key principles on workforce planning over 10 years ago, they remain relevant today, and we have consistently applied them in evaluating federal agencies' workforce-planning strategies.

<sup>3</sup>Office of Personnel Management (OPM), *The Human Capital Assessment and Accountability Framework (HCAAF)* (March 2006). We also reviewed an OPM final rule to implement regulations pertaining to *Human Resource Management in Agencies* (73 Fed. Reg. 23012 (Apr. 28, 2008) (codified at 5 C.F.R. Part 250)) and OPM's HCAAF Practitioners' Guide (September 2005).

and selected FPS regional staff, as mentioned above, to understand their involvement in FPS's human capital planning efforts. We did not assess how FPS tailored each of its strategies to address human capital needs and gaps and critical skills and competencies that need attention. Rather, we asked FPS officials to provide examples of how their strategies addressed human capital needs and gaps. We also did not assess the effectiveness of the *Plan* because FPS is still in the process of implementing it. After the conclusion of our audit work in February 2016, we received NPPD's *Human Capital Strategic Plan* and we reviewed it to compare to FPS's *Plan* to the extent that time allowed.

To assess the design and use of FPS's staffing model, we reviewed FPS's August 2013 model (the latest available) and relevant FPS documents, and interviewed FPS officials to better understand the process they followed to design the model and how they collected data used in the model. We evaluated FPS's design of the model using standards for internal control in the federal government, our 2009 guidance on assessing the reliability of computer-processed data,<sup>4</sup> and key practices we identified on the design of staffing models. We identified the key practices from our previous reports that discussed staffing models,<sup>5</sup> discussions with a physical security industry association,<sup>6</sup> and staff within our agency with workforce-planning expertise. We initially identified 11 key practices, but used four key practices to evaluate how FPS designed its staffing model. Three of the 11 practices were not yet applicable because FPS had not yet assigned staff to manage the staffing model, and we consolidated 8 of them because they had similar characteristics. For instance, we consolidated 3 practices on addressing

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<sup>4</sup>GAO, *Standards for Internal Control in the Federal Government*, [GAO/AIMD-00-21.3.1](#) (Washington, D.C.: November 1999), *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C.: September 2014), and *Assessing the Reliability of Computer-Processed Data*, [GAO-09-365G](#) (Washington, D.C.: February 2009).

<sup>5</sup>See for example GAO, *Homeland Security: Preliminary Observations on the Federal Protective Service's Workforce Analysis and Planning Efforts*, [GAO-10-802R](#) (Washington, D.C.: June 14, 2010); *DOJ Workforce Planning: Grant-Making Components Should Enhance the Utility of Their Staffing Models*, [GAO-13-92](#) (Washington, D.C.: Dec. 14, 2012); and *Aviation Security: TSA's Staffing Allocation Model Is Useful for Allocating Staff among Airports, but Its Assumptions Should Be Systematically Reassessed*, [GAO-07-299](#) (Washington, D.C.: Feb. 28, 2007).

<sup>6</sup>An official from the Federal Law Enforcement Officers Association provided insights on key practices for staffing model design.

data issues into one because all of them related to data quality. The four key practices call for:

1. incorporating work activities, frequency, and time required to conduct them;
2. incorporating risk factors;
3. involving key stakeholders; and
4. ensuring data quality to provide assurance that staffing estimates produced from the model are reliable.

These four key practices help provide reasonable assurance that the design of the model will provide estimates to help management make staffing and other decisions consistent with an agency's mission.

As part of our review of FPS's design of the staffing model, we also assessed the reliability of data FPS used in the model by reviewing available documentation, interviewing agency officials knowledgeable about the data, and examining data entries in the model for obvious errors in accuracy and completeness. FPS officials told us that some data discrepancies we found in our assessment did not significantly impact the estimated number and composition of staff needed to meet FPS's mission. Given the large volume of data in the model, we did not verify this. We could not determine the reliability of data used in the model as FPS did not provide us with documentation on steps taken to ensure data quality, which is a key practice discussed more fully in the report. However, to examine the quality of selected data inputs (e.g., estimated time for completing certain work activities) in the model, we conducted semi-structured interviews with randomly selected area commanders in three regions, as mentioned above, to gauge the data's reasonableness. We cannot conclude that all the data input in the model are reasonable, as we judgmentally selected some data inputs to verify. We also did not talk to subject matter experts to determine how they identified some data inputs, such as the number of hours the agency needed to complete work activities.

Finally, to examine how FPS uses its staffing model, we reviewed FPS's staffing analysis documents to understand FPS's staffing levels and interviewed FPS headquarter officials. We evaluated FPS's use of the

staffing model using standards for internal control in the federal government and associated guidance.<sup>7</sup> We did not verify whether the staffing model identified the optimal workforce FPS needs to effectively carry out its mission. We also did not review the size and composition of FPS's workforce of Protective Security Officers (i.e., contract guards) because FPS did not include them in its staffing model.

We conducted this performance audit from May 2015 to March 2016 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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<sup>7</sup>[GAO/AIMD-00-21.3.1](#), [GAO-14-704G](#), and GAO, *Internal Control Management and Evaluation Tool*, [GAO-01-1008G](#) (Washington D.C.: August 2001).

# Appendix II: Federal Protective Service's Activities

The Federal Protective Service (FPS) classifies its activities into five categories—primary activities, secondary activities, enabling activities, support activities, and supplementary activities. See below for a description of these categories and the activities FPS identified. Some activities have a number of associated tasks.<sup>1</sup>

Activity category	Description of category	Activities
Primary activities	Activities essential to the performance of FPS's mission of protecting federal facilities, their occupants, and visitors.	<ul style="list-style-type: none"> <li>• Law enforcement response</li> <li>• Protective investigations</li> <li>• Facility Security Assessments (FSA)</li> <li>• Protective Security Officer services</li> <li>• Criminal investigations</li> <li>• Technical countermeasure services</li> <li>• Law enforcement policing and patrol</li> <li>• Critical incident and special security operations</li> <li>• Facility tenant support</li> <li>• National Infrastructure Protection Plan (NIPP) Government Facilities Sector (GFS) support</li> <li>• Delegation management</li> </ul>
Secondary activities	Activities performed as a result of primary activities. The primary activity creates a need to perform the secondary activity. Secondary activities can be directly linked to the primary activities that they inform or enhance.	<ul style="list-style-type: none"> <li>• MegaCenter operations</li> <li>• K-9 operations</li> <li>• Criminal intelligence and information sharing</li> <li>• Protective Security Officer suitability</li> <li>• Covert security testing</li> <li>• Operation Shield</li> <li>• Federal, state, local coordination</li> <li>• Contingency operations</li> </ul>
Enabling activities	Activities that help to sustain operations by providing a foundation of required capabilities. Enabling activities generally support a relatively broad set of primary and secondary activities.	<ul style="list-style-type: none"> <li>• Field entry level training</li> <li>• Field standards and certifications training</li> <li>• Field advanced and refresher training</li> <li>• Training development and delivery</li> <li>• Administrative training</li> <li>• Stakeholder engagement and liaison</li> </ul>

<sup>1</sup>FPS identified about 200 total activities and associated tasks.

**Appendix II: Federal Protective Service's  
Activities**

<b>Activity category</b>	<b>Description of category</b>	<b>Activities</b>
Support activities	Activities that include headquarters or regional office operational management and oversight functions.	<ul style="list-style-type: none"> <li>• Acquisition and procurement</li> <li>• Budget, finance, revenue, and performance management</li> <li>• General counsel</li> <li>• Human capital management</li> <li>• Information technology</li> <li>• Logistics, facilities, fleet, and property accountability and management</li> <li>• National field operations oversight (headquarters operations)</li> <li>• Personnel security management</li> <li>• Policy and contingency planning</li> <li>• Public affairs</li> </ul>
Supplementary activities	Activities that represent FPS services that extends beyond its core mission.	<ul style="list-style-type: none"> <li>• Daycare worker suitability</li> <li>• GSA contractor suitability</li> <li>• Fire alarms</li> <li>• Elevator calls</li> <li>• “See Something, Say Something” campaign support</li> </ul>

Source: FPS's fiscal year 2015 *Strategic Human Capital Plan*. | GAO-16-384



# Appendix III: Comments from the Department of Homeland Security

U.S. Department of Homeland Security  
Washington, DC 20528



**Homeland  
Security**

March 11, 2016

Lori Rectanus  
Director, Physical Infrastructure Issues  
U.S. Government Accountability Office  
441 G Street, NW  
Washington, DC 20548

Re: Draft Report GAO-16-384, "FEDERAL PROTECTIVE SERVICE: Enhancements to Performance Measures and Data Quality Processes Could Improve Human Capital Planning"

Dear Ms. Rectanus:

Thank you for the opportunity to review and comment on this draft report. The U.S. Department of Homeland Security (DHS) appreciates the U.S. Government Accountability Office's (GAO) work in planning and conducting its review and issuing this report.

The Department is pleased to note GAO's positive recognition of the "significant progress" the National Protection and Programs Directorate (NPPD), specifically, the Federal Protective Service (FPS) has made to strategically manage its workforce. In particular, GAO found that FPS' development of its strategic human capital plan and staffing model largely align with recognized key workforce planning principals and staffing models.

DHS is committed to securing our nation from the many threats we face each and every day. FPS is at the center of this daily focus, ensuring that every federal facility in the nation – and each individual who supports or desires access to the services of the U. S. Government – is safe, secure and protected from acts of violence, criminal activities and other hazards that threaten our homeland and our principles, freedoms and way of life. FPS is committed to ensuring that staff with the appropriate skills are in the right place, at the right location, and at the right time to achieve its mission.

The draft report contained three recommendations with which DHS concurs. Specifically, GAO recommended that the Secretary of Homeland Security direct the Under Secretary of NPPD to work with the Director of FPS to:

**Recommendation 1:** Identify time frames for developing human capital performance measures with targets that are explicitly aligned to FPS's stated human capital goals.

**Response:** Concur. NPPD's Office of Human Capital recently drafted a strategic human capital plan and complementary operational plan for Fiscal Years (FYs) 2016-2020 in alignment with current FPS human capital goals. The operational plan provides specific objectives and detailed actions that NPPD will take to address its human capital goals within defined timelines. In addition, NPPD's Office of Human Capital, specifically the Division of Policy and Workforce Management, in collaboration with the FPS Office of Resource Management, is developing a recruitment and retention strategy for FPS law enforcement officers. Key performance indicators (KPIs) and performance metrics related to FPS human capital goals will also be developed as part of this strategy. Estimated Completion Date (ECD): June 30, 2016.

**Recommendation 2:** Establish a plan and time frames for updating FPS's staffing model regularly and for unexpected changes in operating conditions.


**Response:** Concur. FPS's Office of Resource Management agrees that a defined timeline is required for future updates of the model. Work documented in the GAO report, such as the rollout of the Modified Infrastructure Survey Tool (MIST) 2.0, together with the independent validation and verification of the FPS "Activity Based Costing model," were necessary steps to improve the quality of the data available to use within the model. FPS's Office of Resource Management will now work with NPPD's Office of Human Capital to determine whether the staffing model should be aligned to updates of the DHS quadrennial review or bi-annually in alignment with future fee review updates. FPS will also explore options to build flexibility into the scheduled updates to the staffing model in order to react to unexpected changes in operating conditions. ECD: March 31, 2017.

**Recommendation 3:** Develop and document guidance on the process FPS will use to ensure the quality of staffing model data, such as how to collect data, validate assumptions, and perform sensitivity analyses to assess the assumptions.

**Response:** Concur. FPS' Office of Resource Management is working with Systems Engineering Development Institute (SEDI) contractors to ensure the quality of data used in the staffing model. FPS has shared an analytical product with GAO describing how the staffing model data was validated. FPS recognizes that additional process documentation efforts to ensure appropriate internal controls are in place will improve future staffing model updates. To address this issue, FPS will require increased documentation to accompany the update to the FPS staffing model, documenting the process of how data was collected and validated to include a sensitivity analysis of the assumptions. ECD: March 31, 2017.

Again, thank you for the opportunity to review and comment on this draft report. Technical comments were previously provided under separate cover. Please feel free to contact me if you have any questions. We look forward to working with you in the future.

Sincerely,



Jim H. Crumpler, CIA, CFE  
Director

Departmental GAO-OIG Liaison Office

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# Appendix IV: GAO Contact and Staff Acknowledgments

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## GAO Contact

Lori Rectanus, (202) 512-2834 or [rectanusl@gao.gov](mailto:rectanusl@gao.gov)

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## Staff Acknowledgments

In addition to the contact named above, Amelia Shachoy (Assistant Director), Roshni Davé, Joseph Franzwa, Geoffrey Hamilton, Delwen Jones, Jennifer Kim, Steven Lozano, Sara-Ann Moessbauer, Janice Morrison, Joshua Ormond, Malika Rice, and Rebecca Shea made key contributions to this report.

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