

National Park Service
Interior Region 1, North Atlantic-Appalachian
Ranger Services Division

Shenandoah National Park

Ranger Activities Division

Law Enforcement Policy Audit & Program Assessment



Audit/Assessment Dates: November 1-5, 2021

Report Completed: June 15, 2022 - DRAFT

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Executive Summary

Background

A policy audit and program assessment were conducted at Shenandoah National Park (SHEN) on November 1-5, 2021. SHEN Superintendent Patrick Kenney supported these services.

The audit and assessment (from here on known as “assessment”) results in this report are presented as observations and recommendations for law enforcement program compliance and operational effectiveness. It should be noted that this assessment represents a snapshot in time covering three days and does not intend to capture every aspect of the operation. The focus of this audit and assessment is primarily on the law enforcement program at SHEN.

Shenandoah National Park lies along the crest of the Blue Ridge Mountains in northern Virginia, extending from Front Royal in the north to Waynesboro in the south for a total of 197,000 acres.

The main ridge rises to heights of over 4,000 feet above sea level, with lateral ridges separated by stream hollows branching off to Piedmont on the east and the Shenandoah Valley to the west. The water gaps which formed breaks in the high ridges facilitated travel in the settlement periods and are now locations of major east-west highways that pass through the park. SHEN preserves an outstanding representation of the Blue Ridge/ Central Appalachian biome making this a valuable part of America's heritage.

In 2020, annual park visitation surged to 1.7 million visitors from 1.4 million in 2019. The park has more than 500 miles of trails, including 101 miles of the Appalachian National Scenic Trail. 79,000 acres are designated as Wilderness. SHEN has exclusive federal jurisdiction. The boundary is surrounded by numerous private landholdings and includes eight counties.

The SHEN Ranger Activities Division (RAD) plays a crucial role in protecting these unique resources as well as the visitors who enjoy them. Traditionally, the division has been managed with three distinct districts (North, Central, and South). However, patrol operations have been managed as a single operation with a unified schedule for parkwide patrol in the past year.

The Chief of Ranger Activities also manages the following programs: Search and Rescue, Emergency Medical Services, Wildland Fire, Structural Fire, and Fees.

Commendations

The reviewers noted the following program commendations:

- There is a high degree of commitment by most staff to a successful and positive work environment. Current supervisors engage in dialogue with team members and work towards continual improvement.
- The SHEN RAD operation is well regarded and valued by other divisions.
- At the time of the assessment, patrol vehicles were well maintained and generally met agency standards.
- Law Enforcement training occurs regularly and is well received.
- There is a strong commitment to quality training and supervision for the seasonal law enforcement staff.
- All of the required Standard Operating Procedures (SOPs) were current, well thought out, and in compliance with agency policy.



- The Chief Ranger is well regarded by both field staff and the leadership team.

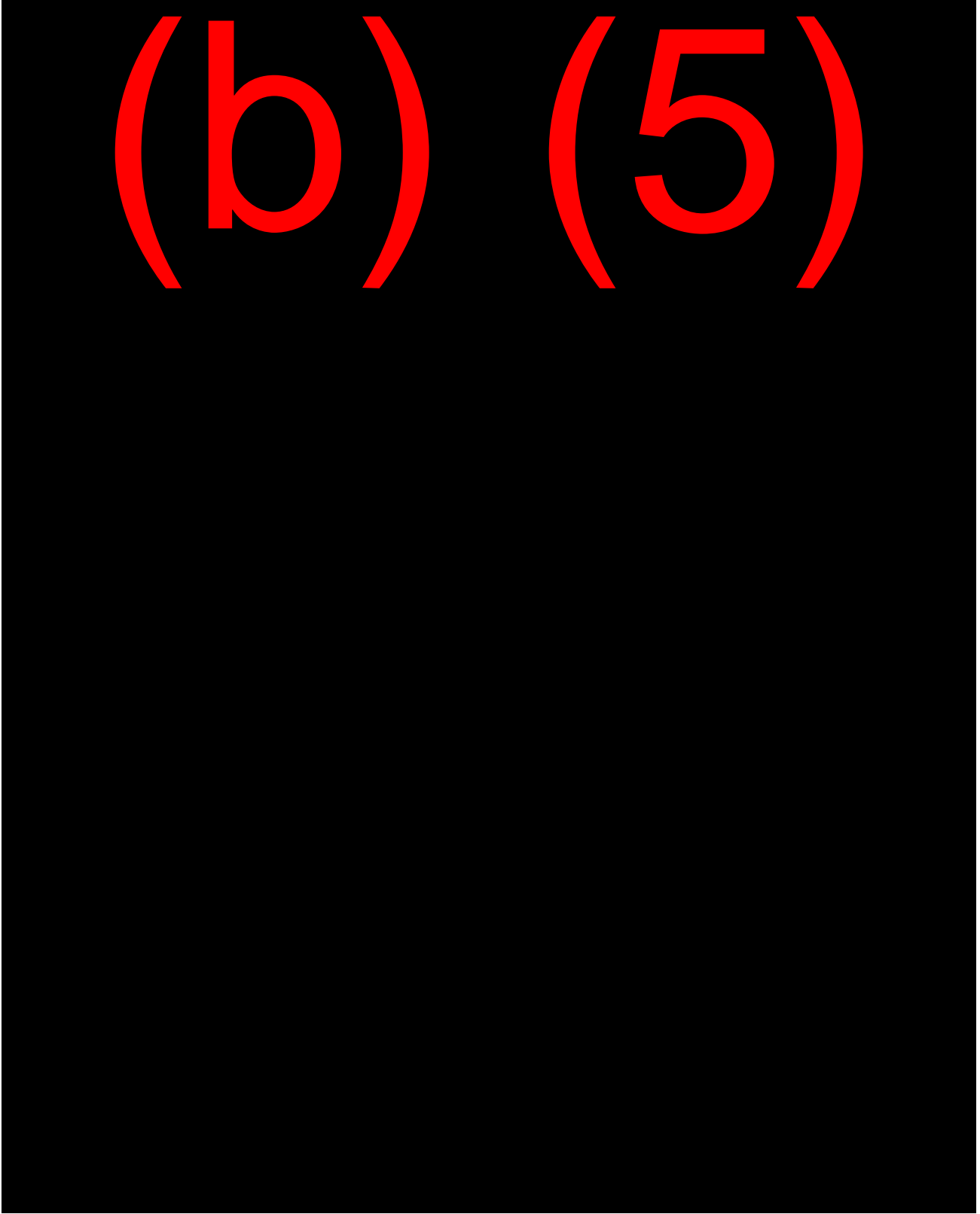
Priority Recommendations

The Law Enforcement program was the only program area audited during this site visit. The assessment portion evaluated the overall health of this program area. The list below represents the assessment team's primary recommendations and focus areas.

Law Enforcement Program		
Audit Area	Priority Level	Deficiencies/Recommendation for Corrective Actions

(b) (5)

(b) (5)





Objectives and Methodology

Objectives

The objective of this policy audit was to evaluate compliance with National Park Service policy, specifically Reference Manuals 9.

The objectives of this assessment were to utilize quantifiable metrics to assess program strengths, general risks, and potential areas of improvement (mitigations) based on Operational Leadership (OL) principles.

To meet these objectives, the following general areas were assessed:

1. **Supervision:** Presence and quality and span of control.
2. **Planning:** Presence and effectiveness of written division plans and procedures.
3. **Team Selection:** Effectiveness of recruiting, staffing, and training.
4. **Team Fitness:** Level of fitness and effectiveness of scheduling.
5. **Communication:** Quality of physical (radio coverage) and interpersonal communication.
6. **Contingency Resources:** Presence and reliability of backup and inter-agency cooperation.
7. **Environmental Conditions:** Presence and effectiveness of special risk mitigation plans.
8. **Complexity:** Effectiveness of Operational Leadership implementation.



Methodology

An audit of related RAD policy compliance was conducted through inspection of personnel files, mandatory local operating procedures, security assessments, evidence records, and other policy-related documents. Individual audit areas were rated using an established matrix and process to assign a numerical score to each. The scores were summarized, and an overall audit score was assigned and presented in this report.

The program assessment was conducted by evaluating planning documents and local procedures, employee surveys, and personal interviews with the Chief Ranger and the Management Team. This information was collectively reviewed, and observations and recommendations were generated to assist program improvements.

The following individuals were interviewed as part of this assessment and audit:

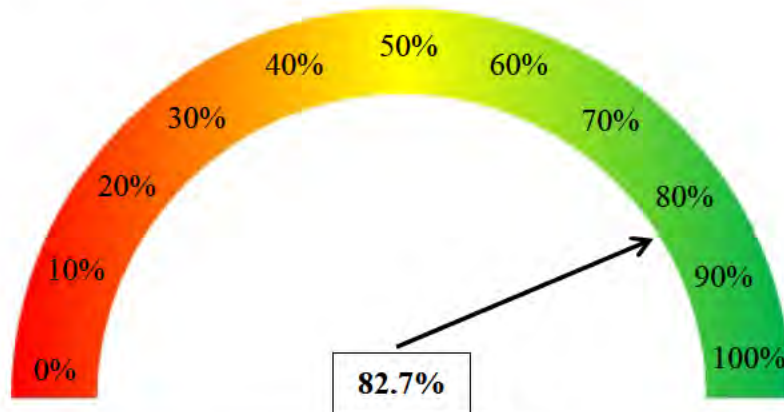
(b) (7)(C)





Audit Score

The overall policy audit score is derived from averaging the individual areas of evaluation (see the audit worksheets for details). All audited program areas (LE) were averaged and combined to provide the following overall score.

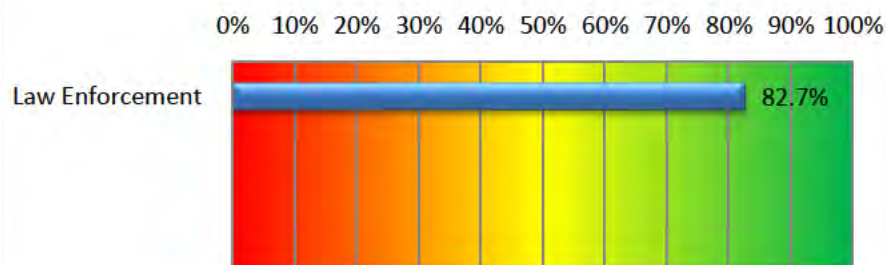


Overall Audit Rating

Rating	Description
0-33%	Program is in need of major improvements to be in compliance with policy
34-66%	Program is in need of improvements to be in compliance with policy
67-100%	Program is well planned and compliant with policy

Overall Policy Audit Scores

2021

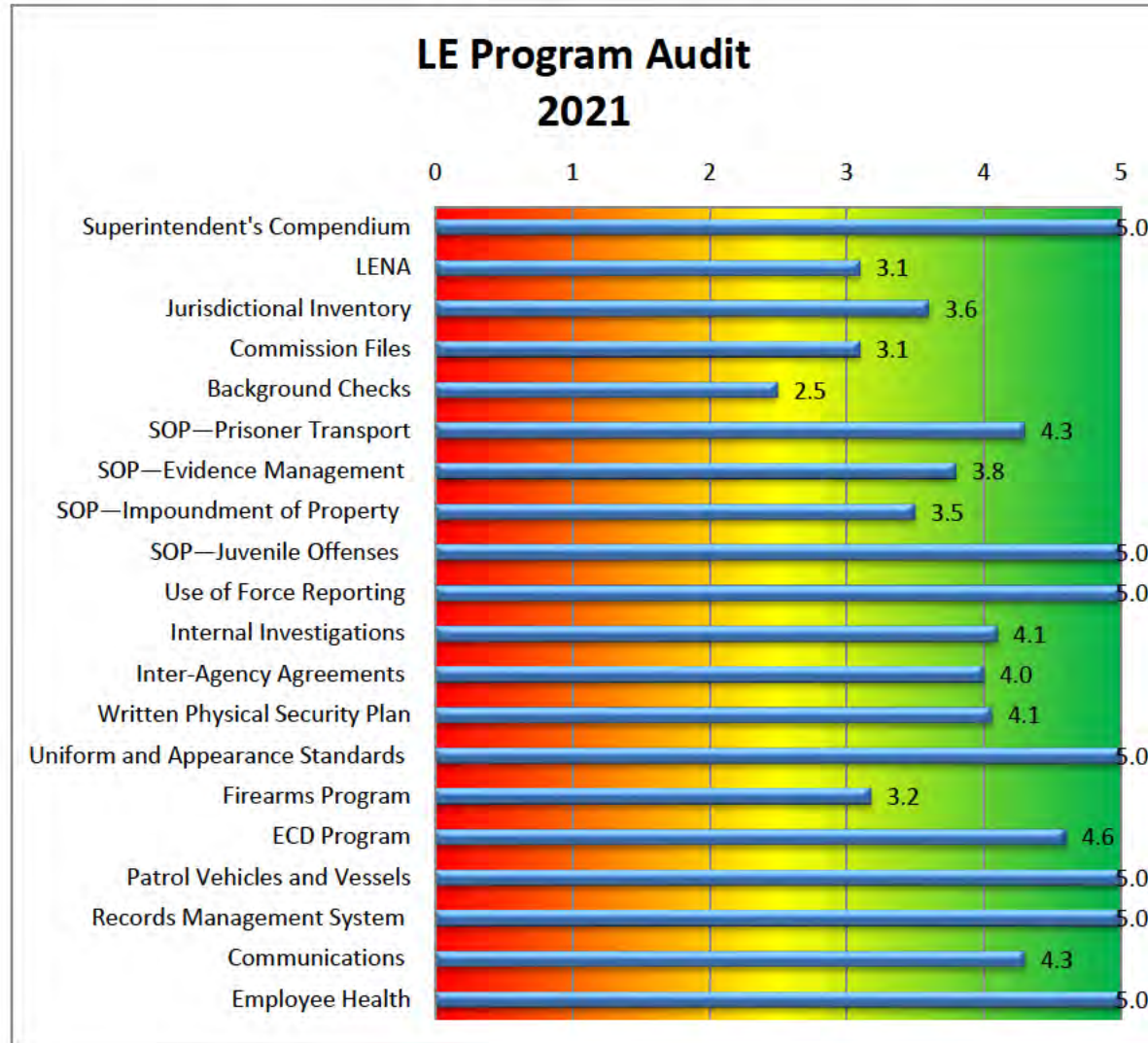




Law Enforcement Policy - Reference Manual 9 (RM-9)

The Law Enforcement Program is in good condition but would benefit from a few improvements to be more aligned with national policy. The LE Program's overall average is 82.7%. SHEN has working relationships with cooperating agencies. Please see above the assessment team's primary recommendations and focus areas.

The chart below illustrates a summary of the law enforcement audit results.

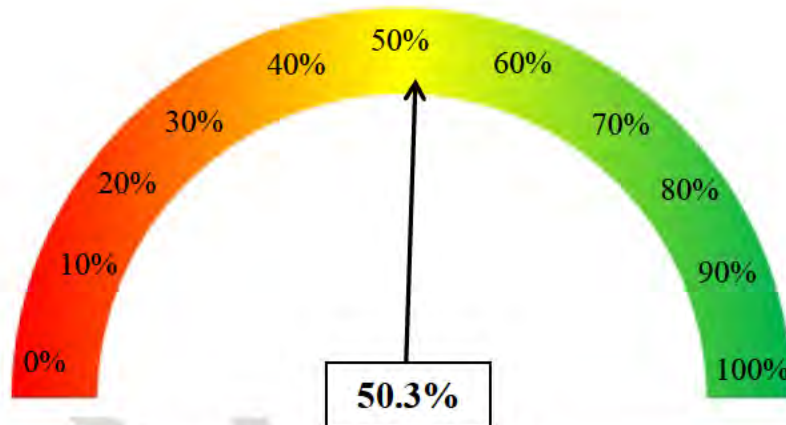




Assessment Score

This program assessment evaluated the general health of the organization using an anonymous employee survey and direct evaluation of general management practices. An online survey was distributed by the Chief Ranger and was completed by the RAD staff ((b) (7)(C) employees completed the survey). There are opportunities for improvement as with any operation, and the team is poised for continued growth and success in providing high-quality visitor services.

The combined average score of all evaluated areas was 50.3%, solidly in the amber zone. More detailed information is provided in the body of this report.



Overall Assessment Rating	
Rating	Description
0-33%	Significant improvements in strategic planning and employee morale are needed.
34-66%	Improvements are needed; exposure to operational risk is likely.
67-100%	Program is relatively healthy, well planned, and operational risks appropriately identified.

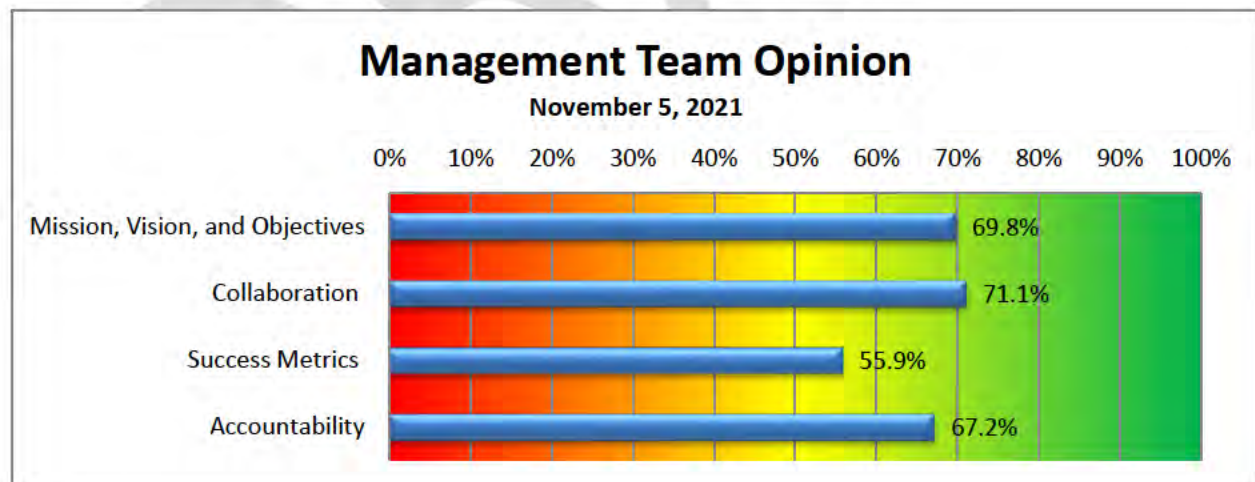


Management Team Opinion

The park's management team was asked several questions related to their impression of park-wide implementation of strategic goals, collaboration among staff, establishment and consistent reporting of accomplishments, and a culture of accountability: the higher the percentage, the stronger agreement for that question.

1. Does the park have a well-established mission, vision, and objectives known to the entire staff?
2. Are the park's mission, vision, and objectives known to all employees?
3. Do all divisions collaborate in joint planning to ensure effective resource protection?
4. Does the Chief Ranger collaborate effectively with other divisions?
5. Do they know and understand the Visitor and Resource Protection Division's mission and objectives?
6. Are metrics utilized at every level of the organization that accurately evaluate mission accomplishment through established objectives?
7. Is there is a strong culture of accountability for accomplishment and risk management throughout the organization?
8. Are Operational Leadership and risk management fully implemented into planning and operations at all levels?
9. Does RAD add value to the park as a whole?

There was a moderate range of scoring in each of the categories. The responses averaged above 50% approval rating. The following table gives the average scores.

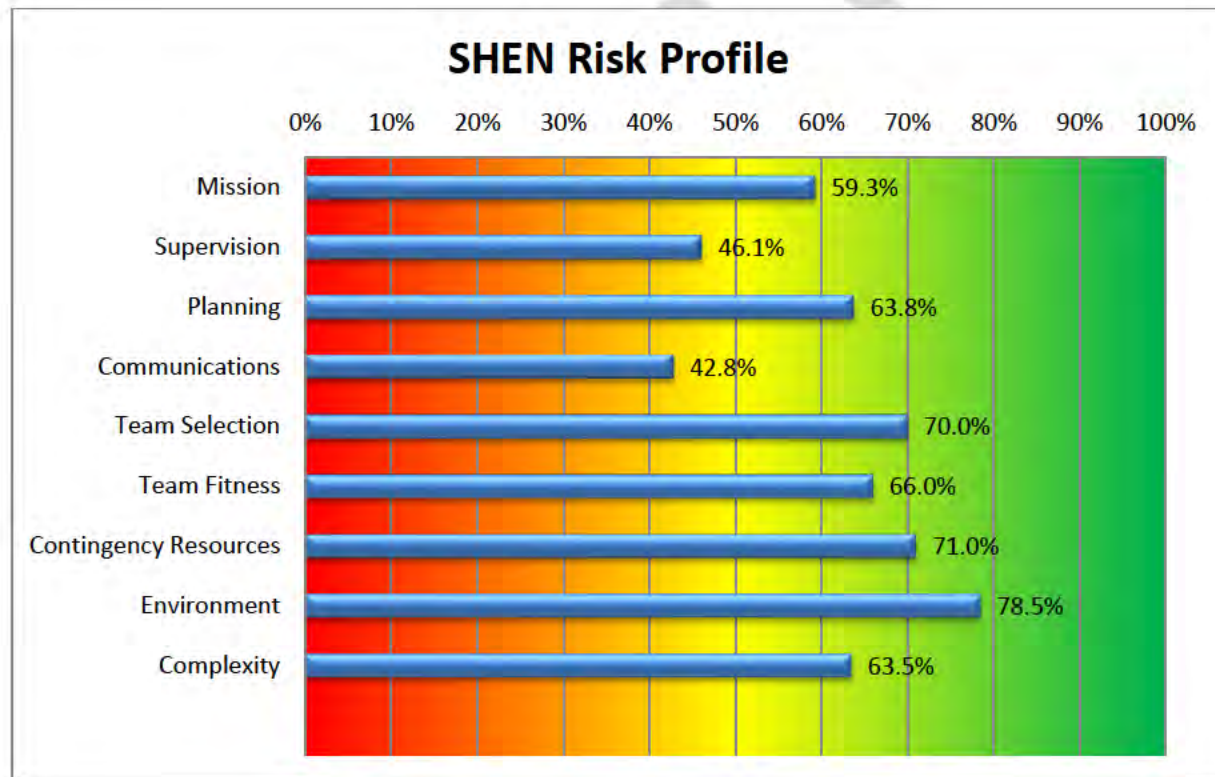




RAD General Risk Profile

The following is an operational assessment based on RAD employee opinion, an evaluation of strategic planning and implementation, and the division's organization. The division received mid-range scores in almost all categories. The lowest scoring area was Communication, Planning, and Supervision.

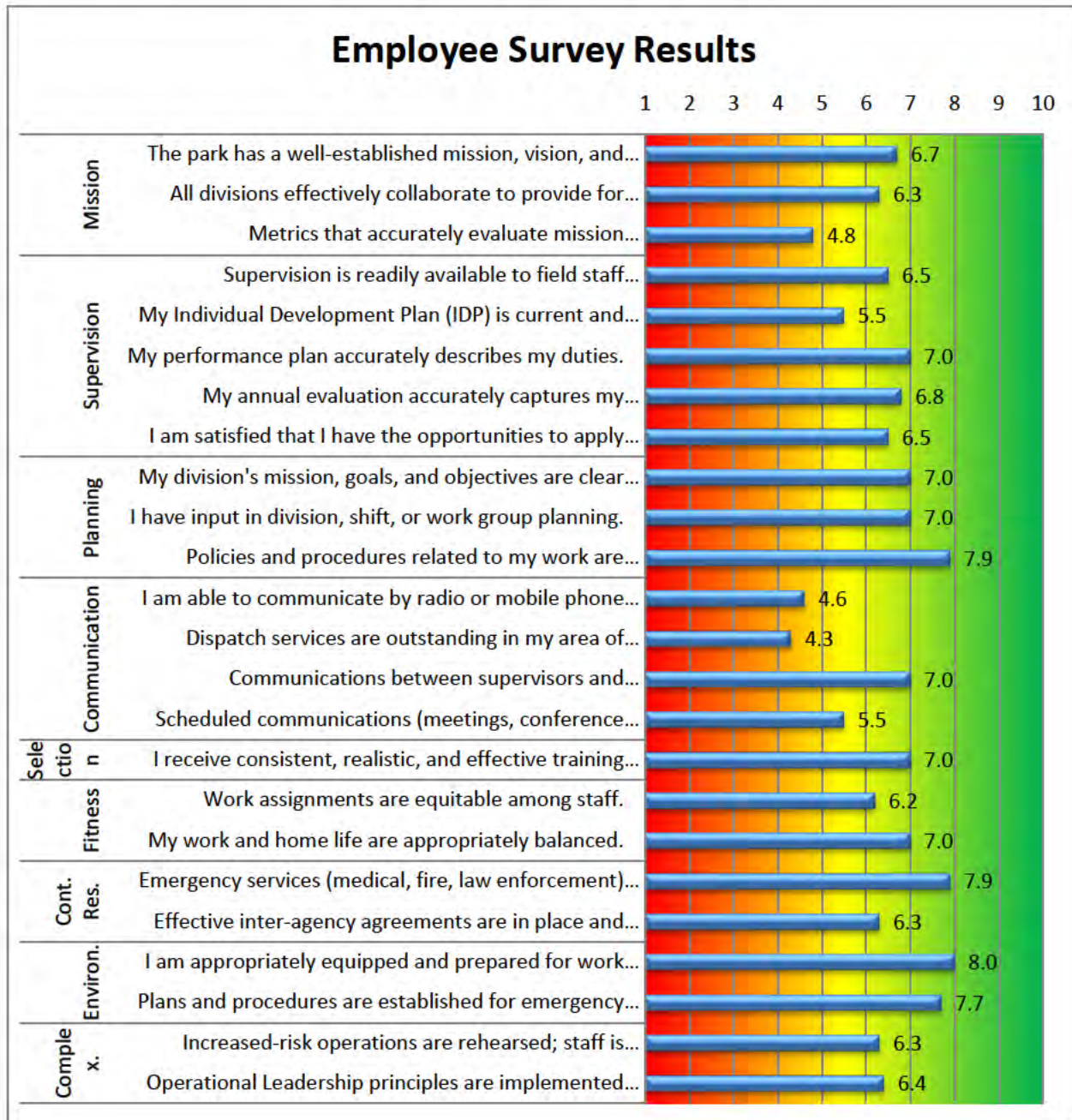
The overall average score was 64.9%, providing opportunities for improvement. Focus on a division's goals and priorities would also include the development of a VRP mission, vision, and specific operational objectives. There are still many opportunities for improvement, described in the following pages.





Assessment Results (General Risk Profile)

The following is an operational assessment based on RAD employee opinion, an evaluation of strategic planning and implementation, and the division's organization.





Mission Knowledge and Execution

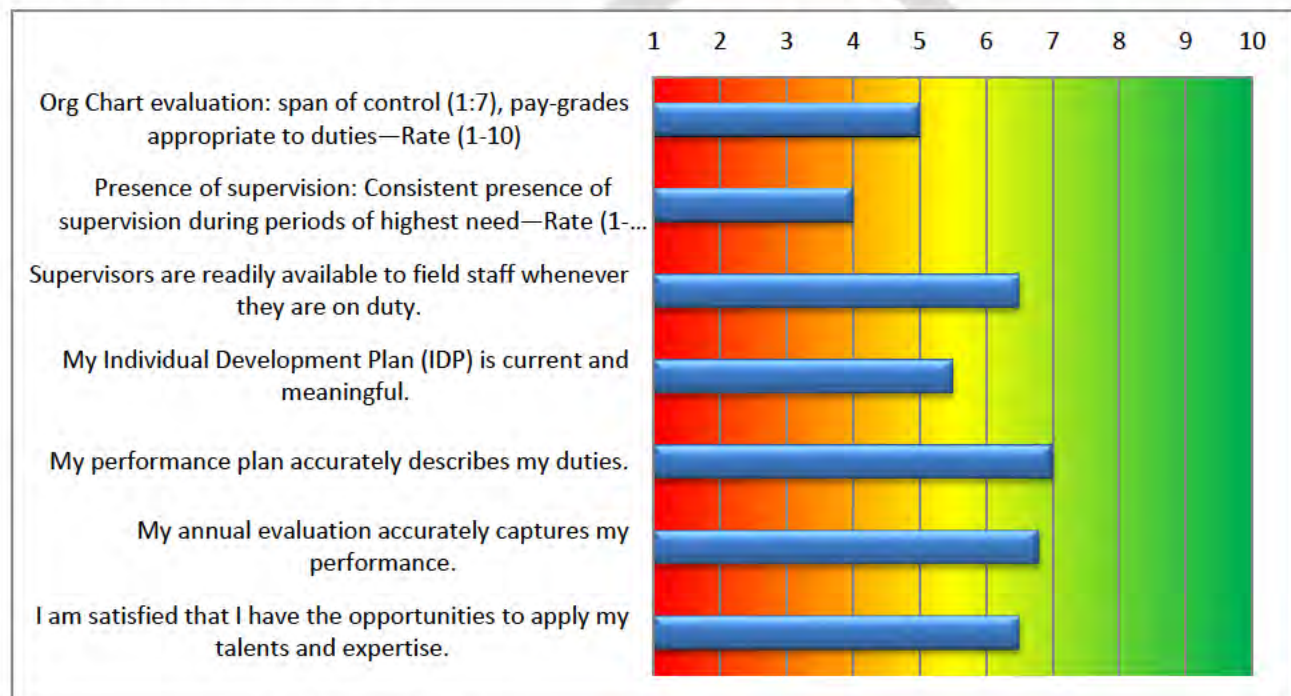
General Observations:

The overall score for park mission knowledge was 51%. These questions are the first asked on the survey for good reason as they form the foundation for results throughout the rest of the employee opinion survey. There is deep institutional knowledge at SHEN with talented team members throughout the park.

Recommendations and considerations:

(b) (5)

Supervision/Leadership



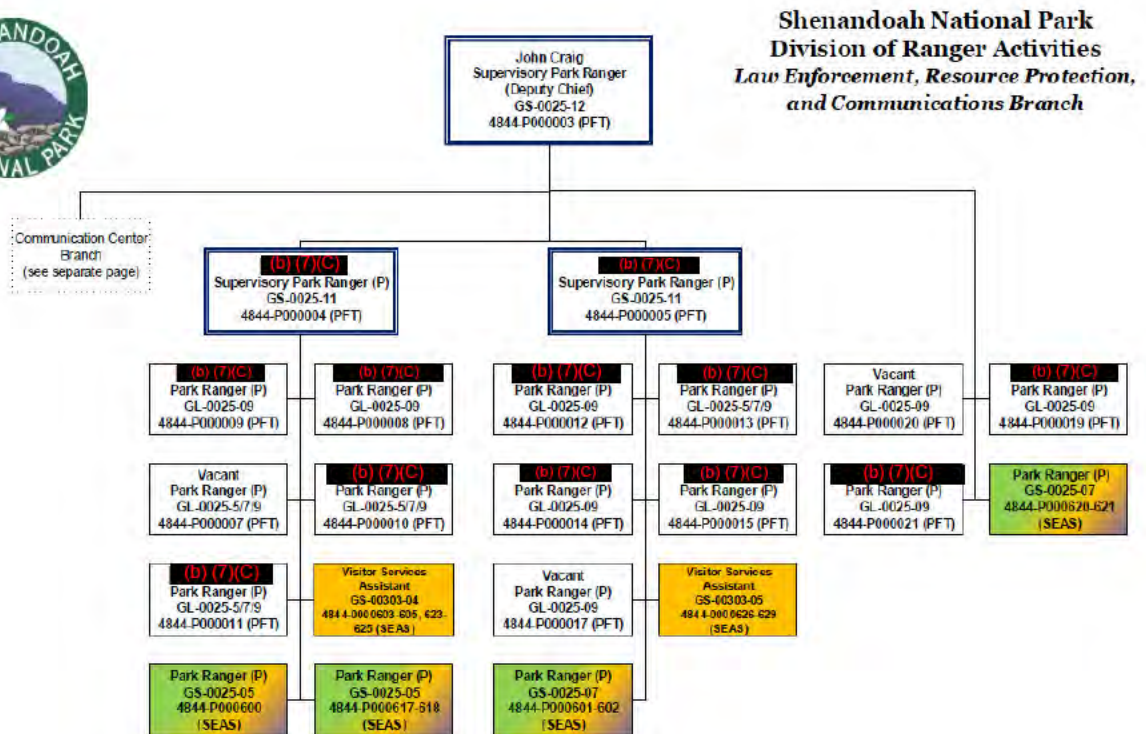
Observations:

Supervision scored 57.6% overall average, solidly in the amber zone. The lowest scoring areas were IDP, supervisor being present during periods of highest need, and span of control. These may be closely related as professional development opportunities should be closely associated with utilizing the skills and talents of the staff effectively.

The division is currently approved at a law enforcement staffing level of 10 GL-9 Law Enforcement Rangers, 3-6 seasonal commissioned employees (from different fund sources), two GS-11 Supervisory Park Rangers, a GS-12 Deputy Chief, and a GS-13 Chief Ranger. The following page illustrates the current organization.



Current Organization





Current Schedule and operational framework

In 2020, RAD shifted from a three-district organization to a single operational model with a unified schedule. This model spreads Rangers out geographically across the park on any given shift based on visitor use, and to facilitate better coordination during patrol shifts. The merit of this model is that it fosters a parkwide approach to incidents, as well as ensuring that there is always a supervisor available on shift. Rangers have the opportunity to patrol all areas of the park and patrol operations are able to adapt more easily to the emerging priorities.

Implementation of this new operational model has been met with some skepticism among longtime staff, as the district model had been the default for many years. However, most respondents agreed that the single operational model with a unified schedule was working better than expected.

Some respondents indicated that the on-duty shift supervisor did not routinely provide direction for coordinated patrol activities.

Current supervisors have said that they are unable to plan or assign priorities due to a shortage of staffing. They further stated that the operation is being approached in a reactive manner.

Recommendations:

(b) (5)



(b) (5)

DRAFT



Proposed realignment

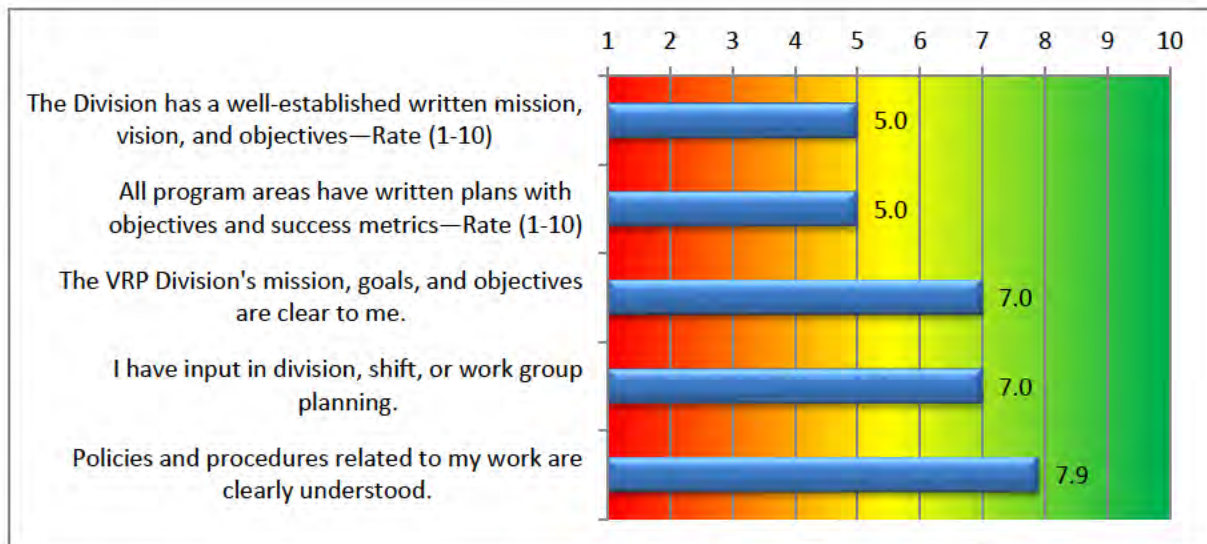
(b) (5), (b) (7)(C)



IDP Development— Individual Development Plans (IDPs) are a valuable tool for professional development. Utilize IDPs to plan and identify professional development goals that can be accomplished within an employee's current duties. IDPs should not be viewed as a wish list for training, rather, should identify training or experience that is reasonably attainable in the current budget climate. If travel restrictions are a major factor, much can be accomplished with little or no budget impact (program management, division initiatives, accomplishing and reporting local objectives, etc.) as many exceptional facilities are nearby.



Planning



Observations:

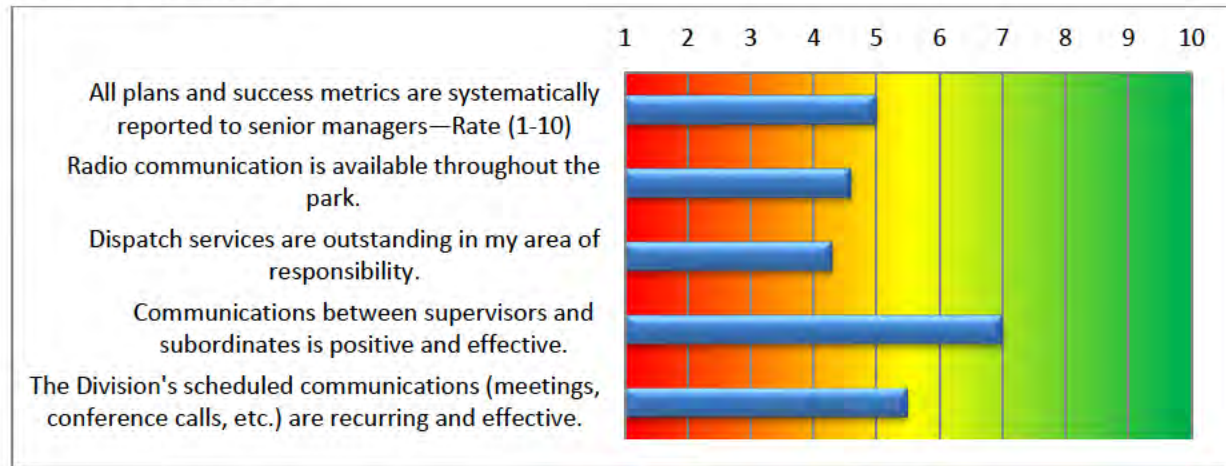
Planning received an overall average score of 63.8%. All staff stated they feel their comments, and input are considered and they contribute to the workplace goals and strategy and take great pride in the division.

Recommendations:

(b) (5)



Communication



Observations:

Organizational and team communication received an average overall score of 52.8%. (b) (5)

[REDACTED]

[REDACTED]

Frustration was expressed over the timely completion of administrative duties – items such as payroll, EPAPs, travel, credit card statements, etc.

Radio communication issues are well understood by the field and park management. Efforts to address these significant issues are ongoing.

Recommendations:

(b) (5)



Team Selection

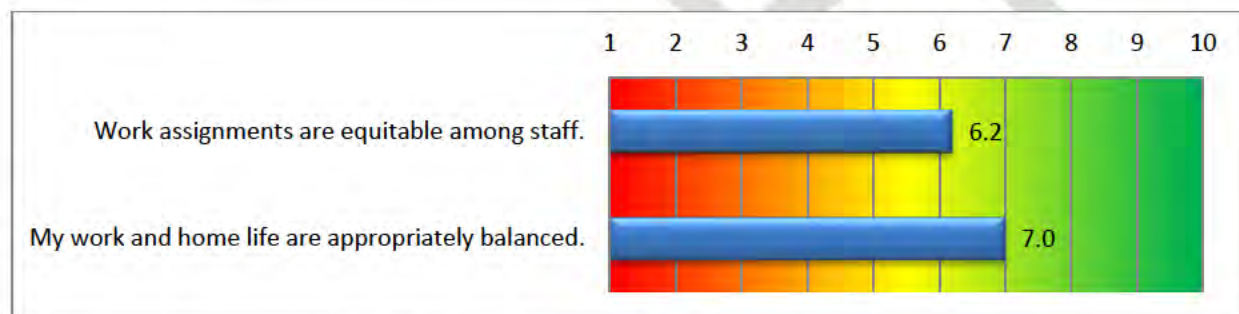
Observations:

Team Selection is evaluated through one survey question, “I receive consistent, realistic, and effective training directly related to my duties”, which scored 70%. Each Ranger felt they had opportunities to receive training to help them advance in their career. All admitted budget constraint is an issue.

Recommendations:

(b) (5)

Team Fitness



Observations:

The overall average score in this area was 66.0% overall. Most felt that with the minimum staffing collateral duties have increased.

All staff provided positive remarks on the opportunity allowed for fitness.

Recommendations:

(b) (5)



Contingency Resources



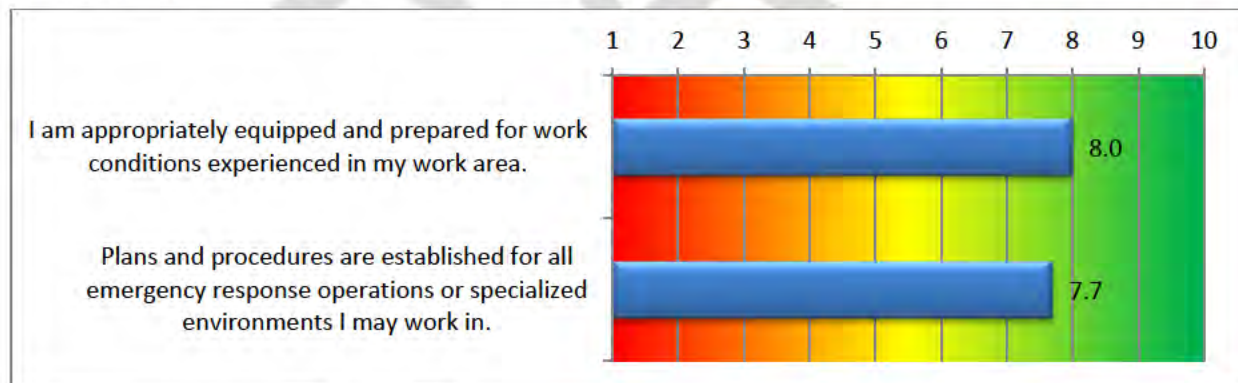
Observations:

The overall average score in this area was 71.0%. The Park has a solid and outstanding working relationship with other LE, fire, and EMS entities outside the Park. Agreements exist but are either expired or under review/development.

Recommendations:

(b) (5)

Environment



Observations:

Employee opinion regarding environmental conditions and preparations received a rating of 78.5%. Most staff felt appropriately equipped to complete work. (b) (5)

Recommendations:

(b) (5)



Complexity



Observations:

SHEN is complex program in an area of exclusive federal jurisdiction. RAD engages in the full spectrum of traditional ranger duties beyond law enforcement – Dispatch, SAR, EMS, Fire, and Fees.

Increased risk operations preparedness received a rating (average) of 63.5%. (b) (7)(E)

[REDACTED]

Recommendations:

(b) (5)



Summary

A general management approach that emphasizes ongoing improvement and adaptation to operational needs will continue to benefit the employees. The Division has a highly skilled team and is committed to the success of the park. The law enforcement program is well-run, professional, and manages a large workload.

Building a foundation of an established division mission and goals will provide clarity when developing personal performance plans and critical elements.

Overall, policy adherence is high. However, a few components, particularly in the essential areas described above, have still to be finalized.

(b) (5)

It has been a pleasure to provide SHEN with this audit and assessment service. Please do not hesitate to contact Regional Chief Mark Pita or Regional Law Enforcement Specialist Isander Rodriguez if you have any questions or assistance as progress continues at SHEN.

(b) (7)(C)

Although the three-district concept is preferred, the one-park operation provides better engagement.

Big Meadows-Central District is the busiest area.

Challenges

Multiple vacancies

The majority of calls are EMS/SAR related, with very few LE calls.

(b) (7)(E)

Pros

Winter Operations work very well in the past.

(b) (7)(C)

Preferred three district model.

Busiest area is Big Meadows- Central District

Challenges

Team morale is the biggest challenge.

People not seeing the future.

There is a lack of trust.

Comms aren't great, but they're at their strongest in the winter.

Team is more reactive than proactive

There appears to be a divide between the Superintendent's office and the RAD.

Superintendent should be familiar with his employees.

Pros

The equipment is excellent.

There is always excellent training available.

Inter-divisional cooperation is excellent.

D.C. locality pay status?

(b) (7)(C)

Challenges

Multiple vacancies

Rangers are unable to do administrative tasks in Simmons Gap due to a lack of internet.

For the past three years, Simmons Gap has been without a supervisor.

(b) (7)(E)

Pros

Great vehicles and equipment

Chief Ranger is very supportive.

Good work life balance

(b) (7) (C)

Although a three-district concept is preferred, one district is preferred to two.

Busiest area is Central District

Challenges

Staffing levels are the biggest challenge.

(b) (7) (C)

Comms are hit or miss.

Southern Area had dead zones.

Ranger Station has been without internet or phone connectivity for the past four months.

There appears to be a disconnect between the Superintendent's office and our division.

Superintendent does not understand the operation.

Micro Managers- they want to be updated on everything.

Pros

The vehicle and equipment are great.

(b) (7) (C)

Loves the work life balance.