Second Century Rangers:

A Vision for Hiring, Training, and Developing Commissioned Rangers In The Second 100 Years of the NPS
Executive Summary:

This paper presents a simple and efficient restructuring of the hiring and training of NPS rangers that increases the safety of our employees and the visiting public, improves the efficiency of the workforce, reduces the overall cost of basic law enforcement training, ultimately saving the U.S. Government money, and creating a far-more-diverse commissioned ranger workforce:

Cooperative hiring of commissioned seasonal rangers, and sending them directly to the Federal Law Enforcement Center (FLETC) for basic training.

This adopts the applicant selection and training model of every major law enforcement agency in the Federal government (including the US Park Police) and places the NPS more in line with Departmental policy for screening of law enforcement officers.

Such a transition establishes a sound foundation for building a better trained, safer, more efficient and more diverse workforce in the next 100 years of the NPS.

Contents:

Part One: Training

Part Two: Hiring, Applicant Selection, and Suitability for Law Enforcement

Part Three: The Hidden Costs of the Status Quo

Part Four: A Comprehensive Solution For The Second Century of NPS Rangers

Part Five: The Burden of Proof

Note: This paper represents the personal opinions of the author only as expressed in personal correspondence to his elected representative. It is not the official position of the National Park Service or any office within, and is not an official work product.
Part One:
Training

A History of Two Levels of Training

When law enforcement in the NPS entered its modern era with the signing of the General Authorities Act in 1976, the NPS was faced with a problem - seasonal law enforcement.

At that time, a large portion of the NPS workforce was composed of seasonal employees. (Similarly, today NPS law enforcement functions with about 1,500 permanent and 500 seasonal commissioned rangers.)

For its permanent employees, the NPS was able to meet new training needs by sending them to the newly created Federal Law Enforcement Training Center. The large seasonal workforce posed a problem for the NPS. First, FLETC did not want to accept seasonal employees as students. Second, the potential cost of sending students to FLETC was perceived as overwhelming for the NPS - an investment that did not seem to show a positive return.

Based on these two assumptions, in 1976 the NPS built a two-tiered law enforcement training system, which it has operated for 35 years, and remains in place today.

Tier one is training for seasonal employees. In the 1970s, the NPS began partnering with numerous state and community colleges and universities to create “seasonal academies.” These schools were designed to teach a curriculum of NPS law enforcement to private citizens who, in the future, would apply to the NPS to be seasonal park rangers, and receive a law enforcement commission of a lesser scope than permanent rangers. There are about 10 of these academies in operation today.

Tier two is training for permanent rangers, who receive training at FLETC, and receive a full, non-restricted law enforcement commission.

This system was crafted under conditions much different than today:

- There were more seasonal rangers.
- There were more seasonal applicants -- seasonal applicants exceeded positions by tens, if not hundreds, to one.
- Tuition at seasonal academies was fairly inexpensive.
- Park rangers being killed or threatened in the line of duty was extremely rare.
- The Federal Law Enforcement Training Center was in its infancy, and had no desire to train seasonal park rangers.
- Law enforcement training in general was far less sophisticated and complex.
There was less threat of liability. Lawsuits against law enforcement agencies were fewer, and settlements were smaller than today.

The current park ranger position descriptions did not exist.

The population of the U.S. was far less diverse than today.

Rangers were expected to retire sometime in their late 60s.

All of these factors have changed, yet this two-tiered training system developed in the 1970s exists unchanged in the NPS. Other Federal agencies that used seasonal law enforcement officers trained at seasonal academies in the past have abandoned the practice. They don’t use seasonal employees for law enforcement, and train their permanent employees at FLETC.

The ability to provide seasonal staffing is critical to many parks that only have seasonal operations.

The seasonal workforce itself has become critical to the future of the NPS, as it largely is the applicant pool for the permanent workforce. About 95 percent of the permanent law enforcement employees hired by the NPS are former law enforcement seasonals who have graduated from these academies.

The NPS is not unique in its need for temporary law enforcement officers to supplement its permanent staff. The "reserve officers" major city police departments are an example. The military could not function without reserves. However, for both the military and police, the standard of training for their reserves is the same for their regular officers -- ensuring officers have the same basic standard of competency.

Seasonal academy training does not ensure the same standard of competency as FLETC provides for permanent employees.

Seasonal Academy Operation

The seasonal academies are supported by NPS employees who teach classes to private citizens who are hopeful future NPS employees. This arrangement allows these NPS employees to help recruit future rangers, helps to introduce students to the culture of the agency, and helps the employees improve their skills by becoming better instructors. The schools often employ former or retired NPS employees as staff or managers, as they are familiar with NPS law enforcement policies and practice, can help students in applying for positions, and can help support NPS involvement in the program.

Tuition at these schools is paid for by the students - the potential employees. Including lodging, this cost of this training ranges from $1,500 at the most affordable school, to $4,000 - 5,000 for most students.

Once a ranger becomes permanent, a new training standard applies -- the second tier of training. By NPS policy, newly hired permanent rangers, former seasonal or not, must receive basic training at the Federal Law Enforcement Training Center - a 16-week academy called the Land Management Police Training Program (LMPT).

To benefit the agency, however, these former seasonals aren’t required to attend basic training as soon as they are hired, but rather are allowed to perform law enforcement duties for two years based on the training they
received at the seasonal academies. About 90-95 percent of new permanents are former seasonals with academy training, and wait to go to FLETC. Those few employees who have not been to a seasonal academy are trained at FLETC with little wait. In addition should the wait for FLETC be longer, the two year limit may be extended.

The Varying Quality of Training for Seasonal and Permanent Rangers

There are several reasons the NPS requires previously-trained seasonals to be trained again at FLETC. First, by policy, the Department of the Interior establishes the training requirements for DOI law enforcement personnel, and it has required the FLETC training for permanent NPS employees for many years. Prior to the DOI requirement, the NPS itself decided to send permanent employees to FLETC to ensure quality training.

This policy and practice is based on the long-recognized reality that the training provided at the seasonal academies is not up to the caliber and consistency of that provided at the Federal Law Enforcement Training Center. The managers who have supervised the seasonal academies for the NPS for the last 20 years agree that in a class-to-class comparison, the training at FLETC is superior to that provided at seasonal academies.

The Federal Law Enforcement Training Center trains tens of thousands of Federal law enforcement officers a year. Its facilities are unmatched, with multiple firing ranges, driving ranges, professional role players, mat rooms, and weight rooms.

FLETC has a full-time staff of dedicated instructors, and instructors selected by participating agencies that represent the best in their fields. These instructors are provided training in how to instruct, and must demonstrate proficiency in instructing as part of FLETC’s instructor training program. FLETC instructors teach year round, and are actively involved in shaping the curriculum to ensure it is current.

Seasonal academies do not match the quality of FLETC facilities or instructors. Seasonal academies use instructors with overall much less teaching and training experience. Typically they are part-time instructors that may teach a seasonal academy course once or twice a year. The instructor training requirements at seasonal academies are less than those at FLETC.

The quality of the facilities at seasonal academies varies, but none are as good as FLETC. While students at FLETC learn to shoot on ranges that have electronically timed turning targets to ensure firearms proficiency at speed, some seasonal academies don’t have turning targets. They are timed with a whistle. Often when these students are subsequently tested on turning targets, they have difficulty coping with the strictly-enforced time limits.

FLETC has a multi-acre complex for high speed driving and skid control unmatched by any seasonal academy. One seasonal academy sends students driving through the school parking lot. Another around a vacant lot. One has no facility for skid control driving at all, and very little room for high speed driving. As an example of the importance of driver training, seasonal park ranger Mike Beaulieu died while performing emergency response driving on the job in 1996.
Each NPS student at FLETC is fully equipped with a uniform and full duty belt with simulated firearm and Taser, real baton, and real handcuffs. Students train with the same equipment they will wear in the field so they become fully familiar with its use. This doesn’t happen at seasonal academies. They don’t have enough handcuffs to go around, or simulated weapons, or simulated Tasers, and duty belts. The cost is just too high.

Further evidence in the lower quality of instruction at seasonal academies, and lower standards of the administrators of these schools, has come with the recent efforts to implement standardized lesson plans and testing at the seasonal academies. Despite being told that teaching from the standardized lesson plans on the Fourth Amendment was mandatory, some schools refused to do so. When students were tested, nearly a third of the class failed the test. Rather than admitting fault, the academies asked to “throw out” the questions because the instructor didn’t cover it – never mind the fact that failure to teach the Fourth Amendment is a major potential source of liability. Other high liability areas are not subject to testing oversight by the NPS – such as evaluating student performance in practical exercises.

Another seasonal academy, thought to have met the NPS accreditation standards, completely failed to teach mandatory blocks of instruction. Students that failed to meet firearms qualification standards were issued certificates of successful completion of training. The liability incurred by all involved is astounding.

Seasonal academies are not monitored by the NPS nearly as well as the academy at FLETC. Seasonal academies are very loosely monitored by the NPS, even with efforts toward accreditation. Until 2012 the NPS has never dedicated a full-time employee to the oversight of the national seasonal law enforcement program to ensure quality of training or performed an assessment to determine the proper level of staffing for oversight. At one point, some seasonal academies had not been visited by NPS management to check on quality of instruction for over 20 years. Although this has improved in the last 8 years, the NPS still delegates oversight of law enforcement candidate selection and training to seasonal academies.

The NPS is working to improve the quality of training at seasonal academies, and has met Federal Law Enforcement Training Accreditation standards. These standards are a process of documentation to ensure basic quality protocols are met.

The accreditation process has improved the schools. But rather than relying on this simply to ensure the basic safety of the students, and good value for the students’ money, the ultimate aim of this accreditation will make the NPS more dependent on seasonal academies.

This delegation of basic training oversight is not the universal practice in the NPS. For example, the NPS employs a large cadre of seasonal firefighters, and provides their basic training at government expense, and has never sought to place the burden of such training on the employee. Also within the NPS, the US Park Police has never considered making their trainees pay for training prior to joining the agency. And throughout the Federal system, no other agency delegates or “contracts out” such critical components of the development of its workforce – candidate selection, agency indoctrination, and the screening that is an integral part of basic training.
Seasonal academies are often very good. Most of their employees are highly dedicated professionals, and work wonders in creating solid training with limited resources. Some are even provide law enforcement training at a level recognized by their state. However, no seasonal academy matches the quality of instruction at FLETC.

**Delaying FLETC Training Creates Serious Issues**

Seasonal employees fresh out of the academy are not fully ready to perform law enforcement independently. This is not a radical statement -- the NPS and DOI standard for FLETC graduates is that they must complete a field training program. If FLETC graduates aren’t fully ready, neither are seasonal academy graduates. Field training is a standard in law enforcement to ensure that officers can translate skills learned in the safety of the academy can be employed in the real world. For the same reason, pilots that complete ground school and training on simulators still fly with an instructor when they get on board a real airplane.

The NPS, on the other hand, only provides field training to its permanent law enforcement employees, and only after they attend FLETC. Most permanent NPS LEOs receive FLETC and formal field training only after at least two years of permanent employment. This is often preceded by several years of seasonal employment.

A recent NPS graduate of LMPT had two years of permanent employment and eight seasonal years. She was sent off to field training to complete the basic training needed for her position after 10 years on the job.

Perhaps it would be best for risk management experts and those who study ways of improving government efficiency to evaluate the wisdom of saving basic and field training for an employee with a decade on the job.

Recent high-risk use-of-force cases by commissioned rangers highlight the risks that the NPS takes by placing employees without the highest standard of training in front-line law enforcement positions.

The experience of every other law enforcement agency in the Federal system is to train employees at a government-owned-and-operated academy first their career and send them to field training promptly thereafter.

All of our commissioned employees without the highest standard of training are at risk as long as they are doing law enforcement waiting for the better training.

There are many ways to quantify the quality differences in training. Routinely, parks send newly-hired seasonals into in-park training to identify problem areas and provide remedial training. The NPS training office routinely receives complaints from the field of people who “should not have graduated” from one seasonal academy or another because they could not qualify with a firearm. This doesn’t happen with FLETC graduates. A more scientific study would be to run seasonal academy graduates through the final exams administered by FLETC to see how well they did. This has not been done to a scale that has any validity. Anecdotally, in recent years a handful of seasonal academy graduates participated in in-service training offered at
FLETC as seasonal employees and as permanent employees with Type II commissions, their performance was below that of FLETC students.

Let’s contrast two very dissimilar Federal agencies: the US Capitol Police and NPS Park Rangers. The Capitol Police protect the area around the US Capitol Building. Capitol Police officers never work solo shifts, in remote areas, without backup, or without a complex communications system in place staffed by dispatch professionals. Park Rangers, including seasonal rangers, do. With all of this support infrastructure and staff in place, the Capitol Police recruit and screen their candidates, then send their new hires straight to FLETC for 12 weeks of training, then add on 13 weeks of agency academy training, then have field training. National Park Service seasonal park rangers receive 10 weeks of training at non-federal academies, arrive at parks to perform law enforcement generally without an interview to determine personal suitability to perform law enforcement, and are assigned to law enforcement without field training, often in remote areas, without backup, without good communications. The NPS ranger will work a few seasons in such conditions, become a permanent employee, work under such conditions for up to two additional years, then will be sent to FLETC, and finally will be sent off to field training.

This is true with every other Federal law enforcement agency. Hire, Federally train, then field train.

NPS employees find the long wait to get FLETC training to be absurd and frustrating.

One NPS employee found the situation so exasperating that he has taken his case to court. He doesn’t want to go to FLETC, and is making a case that since he’s already been to an approved academy, and has been doing his job successfully for several years, that he shouldn’t have to go to FLETC so late in his career.

One often overlooked risk that the NPS incurs by postponing attendance at FLETC is that injuries are more likely for these older employees. The reason is that older NPS employees come to FLETC in worse physical condition than younger employees, as evidenced by their scores on physical fitness testing. FLETC studies directly correlate injuries in training to fitness levels.

While the repetition of training is frustrating to employees, managers are frustrated that the NPS sends permanent employees to FLETC and Field Training after they are out of their probationary period. This means that when performance and conduct issues are identified in training, it is much more difficult to fire an employee once they are outside of probation. The NPS has spent tens of thousands of dollars in litigation costs and in settlements with employees that could have easily been terminated in their probationary period.

Managers are frustrated by having to send staff to FLETC in general. It is difficult to interrupt the work of an employee for 27 weeks to send an employee to FLETC and field training when they’ve been able to do basic law enforcement as a permanent employee with a Type II commission based on their seasonal training. This is evidenced by the ever-present solicitations for lateral hires at the GL-9 level that have completed FLETC. Parks obviously want to avoid sending employees to basic training.
The Two-Academy System Causes Training Problems

The NPS fosters two problems by sending potential candidates to seasonal academies, and then sending employees to FLETC. The first is a safety problem created by conflicted training. The second is one that greatly impacts the quality and level of investigations done by permanent employees – that is that rangers tend to continue to behave like seasonal rangers after they leave FLETC.

A typical safety issue arises like this: A potential seasonal learns a defensive tactic technique at a seasonal academy. They work for a few years, get a permanent job, work a few more years while practicing and using this technique. Then they arrive at FLETC, and learn a new and safer technique. This new technique difficult for them after they have been using the other technique for years, but they adapt and learn. When they return to the field under stressful arrest conditions, they then revert to their old technique, or worse, develop their own hybrid of the two techniques. The result is a decrease in the safety of the employee due to inconsistent training, as frequently observed by NPS Field Training staff.

This is something that NPS field trainers conscientiously work to combat. On the day this is being written, a former seasonal is being removed from the NPS field training program because of bad search habits he learned as a seasonal and has reinforced through years of bad practice. Learning a skill and having it reinforced over several years -- then trying to re-learn it -- is difficult, and is extremely risky when this is a law enforcement safety skill.

Similarly, because seasonal employees are taught that their job, based on their type II commissions, involves a lot of enforcement of Title 36 CFR, when they get to the job they focus more on ticket writing and less on looking for and handling felony cases. When they are hired into a permanent position, they revert to past practices and continue to focus on petty offenses instead of looking for and investigating felony cases. Several significant felony resource protection cases have been compromised when a ranger has written a ticket instead of detecting an obvious felony, and managing the case at that level. The largest Archaeological Resources Protection Act case in the history of the NPS began in such a manner, and was jeopardized as the result of a seasonal-academy-trained employee writing a ticket for a felony ARPA case.

Despite warnings, the dependence on seasonal academies is growing stronger.

Despite Warnings, the Dependence on Seasonal Academies Is Growing Stronger
The NPS has been told by the Department of the Interior to lessen its dependence on seasonal law enforcement for safety based studies by the International Association of Chiefs of Police (IACP) and Department of the Interior Office of Inspector General.

Yet the NPS has made no change in its accomplishing this goal as it lacked an alternative that it could afford. In fact, current the budgetary situation finds the NPS working to increase dependence on seasonal law enforcement and seasonal law enforcement academies in order to save money -- despite the known safety risks.

The NPS has also put incentives in place to increase the use of seasonal employees. The NPS Budget Scorecard rewards parks that hire seasonal employees, and penalizes hiring permanent employees. It cites the budget flexibility that hiring seasonals brings. It doesn’t mention safety and performance issues.

The number of newly hired seasonal employees has gone up from 110 in 2005 to 189 in 2010.

However, seasonal employees have a very high attrition rate. The number of seasonals that the NPS retains as return seasonals has decreased. As many as 30 percent of first-year seasonals never return to the NPS. This poor return rate means that the NPS investment in seasonal programs is not as efficient as it would be if seasonals returned for multiple seasons, and eventually became permanent.

With today’s trend, having more seasonals and the same or fewer permanent positions means that seasonal employees that wish to become permanent may become frustrated in their efforts and look elsewhere.

**Attempts At Fixing The Current Training System**

The NPS is aware of the inefficiencies of operating two training systems.

Its current plan is to develop a “Bridge” class that would cut FLETC training for permanent employees to a minimum if they’ve had seasonal academy training. For example, if a student had learned firearms at a seasonal academy, they would not need to learn firearms at FLETC.

From an economic standpoint, a “bridge” for seasonal academies makes sense. It would save the NPS several hundred thousand dollars annually. On paper, it’s a great idea -- one that was conceived in a large part by the writer of this paper. The author also conceived the now-implemented “bridge” program for DOI criminal investigators, the Land Management Investigator Training Program.

However, while improving the NPS fiscal situation, the seasonal academy bridge solution presents new risks that have not been evaluated, and does not solve the many serious risks and issues with the seasonal workforce – from diversity to applicant selection, to the demographically challenged workforce.

No case has been made that the seasonal bridge program will do anything except save money.
The seasonal bridge program places greater dependence on the training provided by the seasonal academies, which is of lower quality than training offered by FLETC. Those involved in the accreditation process for the seasonal academies have stated that there is no way that the seasonal academy training will ever be as good as FLETC training.

The desire to save money on basic law enforcement training should be heavily weighed against what we know about its importance to the safety of the employee.

Even if a “bridge” training program could theoretically be made to be as good as FLETC, such as solution still fails to deal with many of the other problems created by the seasonal academy system – recruitment, demographics, diversity, and others.

The proposed seasonal bridge program can never get around the primary safety issue -- that the full officer safety components of basic training need to be offered at the best available venue prior to assuming law enforcement duties, or inexperienced employees are being placed at risk.

This is not to slight the efforts and good intentions of those involved in seasonal training. They are highly dedicated, and doing the best that they can. It is simply impossible for the colleges that provide the training with little funding and no full time instructional staff to compete against the multi-million-dollar Federal Law Enforcement Training Center in terms of quality of training. This federally-funded multi-agency national security institution does not face the funding challenges that state-run colleges and universities do, and has exponentially greater resources, and instructors with much more training and experience.

**The Inherent Problem with Bridge Courses Creates Risks**

Law enforcement academies serve several functions. One is to provide training and assure skills are learned. Another, of equal importance, is to provide the employing agency a chance to observe the employee behave under simulated work conditions to see if they are suited to perform law enforcement.

This observation period takes time, especially in academies with multiple instructors. If an instructor observes a behavior problem, they may or may not note it, and pass it along to the next instructor.

The author’s experience in managing basic and field training for the NPS, many serious training and behavioral issues don’t become apparent until 12 or 13 weeks into the current 16-week NPS basic training academy.

Even in field training, where one instructor is with one trainee continuously for three weeks at a time, it often takes 4-5 weeks for training problems to become evident. Communications problems between instructors exacerbate this situation. One instructor may not pass on an issue to the next instructor, so the new instructor assumes that this is the student’s first time making the mistake, when in fact they may have made the mistake several times before.

It is easier to overcome such communications problems in one long academy run by a smaller group of instructors than by splitting the basic academy into
two venues held miles and years apart. Doing so makes identifying training issues exponentially more difficult. Complicating this is the fact that seasonal academies have traditionally provided a lower standard of screening than FLETC, and traditionally don’t communicate typical student conduct and performance issues to the NPS.

On paper, a bridge program for basic training works. In reality, segmented training creates the opportunity for breakdowns in communication, inconsistent training, and makes identification of training issues much more difficult, and thus creates new risks for the agency.

**Unintended Consequences of Accreditation and Further Improving Seasonal Academies**

Accreditation of seasonal training is an essential step in improving its quality and consistency. However, it may force some academies out of business, and makes bringing new ones on line more difficult.

Although several seasonal academies have been with the NPS for decades, and serve as the bedrock of the program, many, many more programs have come into the system and left. Programs have changed managers multiple times without telling the NPS. Some schools may not put on classes every year, or may only train a handful of students. The move to accredit these schools puts an unprecedented degree of regulation and expense on the academies in a time of extremely tight budgets. This process makes it more difficult for new academies to enter the system, and more difficult for marginal academies to stay in the program. The unintended consequence of accreditation is that it may reduce the number of seasonals being trained, diminishing the size of the future applicant pool for permanent positions.

With about 12 schools in the system at present and 150 new seasonals hired in an average year, a typical seasonal academy finds work for only 13 graduates, yet many run two classes a year.

**Recurring Ethics Dilemmas over Seasonal Academies**

The NPS has had to deal with ethics questions regarding the seasonal academies for decades.

The schools academies use NPS employees to teach the tuition-paying students. If the schools pay the NPS employees, this triggers the ethics question of employees teaching/speaking/writing for outside employment. Specific guidance has been issued by the NPS ethics office for this that is questionably followed in the program. Not all ethics officials are in agreement with this guidance.

The NPS sometimes pays its employees to teach in the academies, including salary, travel and per diem. When this happens, questions about using government funds to subsidize these non-federal entities arise. These become more relevant in that many seasonal academies provide training for students other than potential NPS employees. The training provided by seasonal academies may be recognized by state parks or other agencies. In a single class at some schools, only half of the students may even be considering NPS
employment. The inefficiency of sending a government employee to provide law enforcement training to private citizens that have no intention of becoming federal employees has somehow escaped the attention of those that examine government waste. At the seasonal academy at Skagit College, NPS instructors teach a class of mixed agencies. The other agencies pay their students to attend. So the NPS instructors are getting paid, the Non-NPS students are getting paid – the NPS students are the only ones not getting paid.

At Northern Arizona University, about 80% of the 400-hour program is taught by NPS employees on government time. If the instructors are GL-9/4 rangers, that costs the government $12,800 per class for instruction time alone, or $25,600 per year for two classes, not counting travel expenses to get to the school.

Another ethical question regarding these programs: Which schools get to receive this subsidy, and which don’t? Who decides? If one school receives NPS support, why shouldn’t they all receive it in equal amounts? What are the ethics questions that arise when school that is run by a retired NPS employee receives significant NPS support, while another, run by someone with no NPS connection doesn’t? Will the NPS support any college that comes to it? What criteria does it use to accept or reject a seasonal academy? There is no policy that governs this, yet the NPS makes such deals on a regular basis.

NPS employees who choose to instruct for the schools that receive a salary from the schools face additional problems – instructor liability. Since they are not teaching under the umbrella of the government, many must take out liability insurance to protect themselves and their families.

To be fair, the seasonal law enforcement programs have operated in the public eye for decades, and no public complaint about the ethics of this arrangement has been raised. However, each new discussion with ethics experts and solicitors on this practice results in discussions involving new ethical twists and nuances.

Perhaps the most concerning ethical problem in the NPS involving seasonal academies is that several employees involved in decisions on whether seasonal academies are beneficial to the NPS or not have expressed desire or intention to teach at or manage a seasonal academy after they retire. While within ethics regulations, this potentially clouds the objectivity of those making decisions about the long-term viability of the seasonal law enforcement training programs. This potential conflict of interest, in itself, should require the NPS to involve third parties unlikely to be employed by seasonal academies to help make any decision regarding the value or viability of such training.

Liability Issues Increase NPS Costs of Seasonal Training

The NPS advocating that high-liability courses at seasonal academies be taught by NPS employees on government time. Firearms training is an example.

The reason is liability. Should a student be hurt during a firearms class, the NPS employee teaching the class could be personally sued. If they are on duty, they would be protected by the Federal Tort Claim Act. If they are being paid by the school, and not on duty, they could be personally responsible for their own legal defense, and may be liable.
Some NPS instructors are refusing to teach these high-risk areas, and the NPS is recommending that they be taught by on-duty employees. The more on-duty employees that are teaching at the 12 seasonal academies, the higher the cost to the government.
Part Two: Hiring, Applicant Selection, and Suitability for Law Enforcement

The Risks of Delegating Quality Control

The NPS seasonal academy program was designed to give the NPS some scrutiny over potential applicants to law enforcement positions by monitoring trainees in the program. Instead, it has put the NPS in an ethical bind. Private citizens who behave erratically at seasonal academies aren’t government employees, so the government can’t track or record their behavior for use in future hiring decisions. These issues have arisen several times where a seasonal academy has contacted the NPS regarding a person who has passed the program but exhibited behavioral issues that alarmed the staff. Because the students were private citizens at a public school, and may not have applied for NPS employment, nothing could be done by the NPS to record the data without violating the law. In other cases, students have been witnessed threatening other students with knives, but the schools failed to act against the violent student, or notify the NPS. Such employees have been offered seasonal NPS law enforcement jobs.

With DOI policies for interviewing and psychological screening being ignored, one could take solace in the NPS’s requirement for a comprehensive background investigation. However, to save money, the NPS uses a lower standard of background check for its brand new seasonal employees than for the permanent employees it has known for years. Because of the seasonal hiring rush, the NPS uses a quick background check (SAC) to bring new employees on board pending the results of a more comprehensive background check. The NPS won’t pay for the full background check required for its permanent employees until much later. In essence, it only rigorously checks the backgrounds of the employees it knows the best. This is why hiring seasonals and sending them as trainees to FLETC is critically important. It allows the NPS to select the candidates, and screen them at FLETC, and not delegate quality control of the very people we need to screen the most.

One policy that is generally followed in seasonal hiring is testing the physical fitness of new seasonal rangers. However, not all testing is conducted to the same standard, and not all new hires are tested. The policy for medical screening and drug testing is followed much better, but not always. Testing new hires as seasonals at FLETC would ensure this essential quality control happens, reducing agency liability and ensuring the safety of employees.

In addition, beginning the background clearance process at FLETC would take the burden off the parks. Parks currently hire new seasonals, then work them unproductively without a commission while their background awaits processing. By sending new seasonals to FLETC, the background checks would be handled at FLETC, and new employees would be productive for the parks sooner, or instantly upon arrival.
Placing the Cost on the Applicant Affects the Entire NPS Commissioned Workforce and is a Great Barrier to Diversity

The NPS is the only Federal law enforcement agency that makes their employees pay for their own law enforcement training. Or rather, makes applicants for law enforcement jobs pay for their own training, just to be qualified to apply. Why? It is extremely important to understand how this one difference affects the entire demographic make-up of the NPS commissioned ranger workforce.

As mentioned above, the cost of seasonal academy training ranges from $1,500 at the most affordable school, to $4,000 - 5,000 for most students, including lodging.

The NPS has great difficulty in hiring racial/ethnically diverse employees in law enforcement.

The NPS does not control who goes to the seasonal academies, but requires seasonal academy completion in order to qualify as a seasonal ranger. The seasonal academies control who becomes a ranger.

While the academies encourage the recruitment of diverse students for their programs, a major obstacle is affordability and access.

Tuition at these schools is paid for by the students - the potential employees. Including lodging, the cost ranges from $1,500 at the most affordable school to $4,000 - $5,000 for most students.

Diverse candidates, as with most Americans, may be unlikely to pay $5,000 tuition and take 10 weeks off without pay to go to a training program in the hope of qualifying for a temporary GS-5 summer job. However, that's the prerequisite the NPS places on applicants for seasonal law enforcement jobs.

This system ensures that the seasonal workforce is relatively free of economically disadvantaged employees, single mothers, and those who are not subsidized by their families. And because 95 percent of permanent NPS law enforcement employees come from the seasonal ranks, the permanent applicant pool is filtered to ensure that the permanent workforce is populated chiefly from those that come from an economically advantaged background.

The recruitment and selection process of the schools affects diversity of the applicant pool as well, as does The location of the schools affects this as well.

This has created a bizarre situation in a time of huge unemployment and increasing enrollment at seasonal academies: Not only are there fewer qualified applicants than there are seasonal jobs, many parks now report a lack of qualified seasonals available to become permanent.

There is no welcome mat into the agency for applicants, minority or majority. Prospective rangers must find out about the basic requirements of the job on their own, find a vacancy at a seasonal academy, receive training at their own expense, and apply for a position with the hope of being hired. The incentive for the NPS to recruit prospective employees to seasonal academies is minimal, as the NPS doesn’t see an immediate return on the investment.
The system ensures that successful applicants come only from a pool whose background includes experiences in, and dedication to, National Parks; typically a monochromatic pool.

Recruiting and applicant selection is crucial to the future of any agency. Delegating these functions to seasonal academies is a major risk.

**Fixing the Hiring Process Means Managed Hiring & Better Employee Screening**

The NPS hires nearly 500 seasonal law enforcement employees a year, a workforce nearly the size of the entire US Park Police. Most of this hiring is accomplished in three months in the spring.

Demand for seasonals outstrips supply, so it’s no surprise that the hiring season is a stampede, and that corners are cut.

One corner cut during the seasonal hiring season is the selection process. The Departmental Manual on law enforcement (446, Chapter 2) requires an interview by qualified personnel for all law enforcement hires. This doesn’t happen in the NPS. There is no standard for who may conduct an interview, no standard for what is in the interview, no requirement to document that an interview was conducted, and no way of ensuring that an interview was done prior to hiring. The NPS can’t say what percentage of its new hires has been interviewed.

The NPS can say, however, how many of its new seasonal LE hires have been psychologically screened: Zero. This critical step in the selection process for law enforcement has never been funded in the NPS. The Departmental Manual requires psychological screening of law enforcement candidates, but the NPS, even in this era of risk management, has never complied with this policy designed to protect the safety of the public and protect the agency from liability, for either seasonal or permanent hires. Experts in such screenings will tell you that they are most necessary for the employees you don’t know, as opposed to those that have a history with the agency. Brand new seasonals are prime candidates for screening.

**Fixing the Hiring Process Saves Money**

During the seasonal hiring process, hundreds of supervisors in the NPS race against other parks. The goal is to hire the few qualified seasonals before other parks hire them. It’s not unusual for a seasonal to accept a job at one park, then later decline the job when an offer from a better park comes in, sending the supervisor back on the hunt.

The fact that any policy is followed during the rush to hire is amazing. In the frantic race to hire seasonals, it’s not surprising that corners are cut in the selection process. The need to have a body available often outstrips common sense and good judgment.

The NPS behaves as if parks are in competition with one another for applicants, when in fact it is a cartel that controls seasonal ranger jobs. Through better management and coordination, it could operate much more efficiently and better ensure a quality workforce.
If parks cooperate to recruit seasonals and send them to FLETC, where they are trained and screened, the parks could then cooperate to hire from the trainee pool at FLETC the trainees that each park needs, taking the time to do it right.

**The Seasonal Selection Process is Unfair to Trainees**

Because the NPS doesn’t control who enters the seasonal academies, citizens that are totally ineligible for NPS law enforcement careers are allowed to enter the training, including non-citizens and those medically ineligible.

Students will pay money to the academy and attend training, then may not be able to pass the background investigation for the position, or may not be able to pass the medical or physical fitness tests provided by the NPS. It is not unusual for seasonal academy graduates to discover that they have a disqualifying medical condition when they apply to an NPS job after graduation. Some students may attend the program and not have a college degree, and thus not qualify for a seasonal ranger job. Their training becomes worthless. It’s rather easy to prevent this, but it’s not done.

While this may seem unfair for the students, it’s incredibly wasteful for the NPS to train people who simply aren’t qualified for the job.

**Attempts at Reforming Hiring**

The NPS has developed and implemented many versions of special “intake” programs to improve diversity in the workforce.

The 1980s had the *Rangers In Training* program, recruiting diverse candidates as Co-Op students and placing them in training. Some were sent to the seasonal academy at Santa Rosa, California, and ended up in law enforcement positions at Santa Monica Mountains National Recreation area. They returned to school, moved to another park the next summer, and ended up with permanent positions. Twenty-two students began the program, 16 got jobs with the NPS, and 8 were still with the agency 10 years later.

The NPS tried similar “initiatives” at Historically Black Colleges and Universities. In the 1980s, the NPS operated three intake schools, going so far as to actually pay the schools $10,000 each to operate the programs and recruit minority students. The students that graduated from the programs quickly left for other Federal jobs, and these programs were shut down after spending nearly a million dollars, and resulting in less than a handful of permanent hires.

The seasonal academy at Northern Arizona University was originally set up as an intake seasonal academy “initiative” at the request of the NPS. The region was supposed to partner with the school, recruit and send students, and provide instructors. The partnership dissolved quickly, and has been forgotten by many involved.

Another “initiative” similar to those of the past is the new “ProRanger” Program being tried in two regions. Students are selected from participating colleges across the country. The NPS pays a salaried employee to work at these colleges. The colleges then train the future hopeful NPS employees, and the students receive NPS internships during the summer.
In the 1980s, the NPS operated three intake schools, going so far as to actually pay the schools $10,000 each to operate the programs. The students that graduated from the programs quickly left for other Federal jobs, and these programs were shut down after spending nearly a million dollars, and resulting in less than a handful of permanent hires.

Rather than sending ProRanger students to FLETC for their law enforcement training, the NPS set up new, additional seasonal law enforcement academies at two new ProRanger schools, with more in the works.

The idea of recruiting potential NPS employees in college is a wonderful idea, and channeling these potential employees into internships is a logical progression. It didn’t work in past efforts with seasonal law enforcement academies, but hopefully it will work today with renewed energy and creativity. The point in bringing this up is not to belittle this type of effort -- it’s to illustrate that the NPS is willing to spend large sums of money on hiring experiments, such as the ProRanger program and its predecessors. The relatively modest costs of sending seasonals to FLETC are much less of an “experiment,” are much more likely to pay for themselves in productivity and safety, and will have large-scale results in a short period of time.

In fact, by sending seasonals to FLETC, the door is opened to creating many more such program as the cost and complexity drops dramatically. Every school can potentially be a potential ProRanger school if we adopt this program. The ProRanger philosophy is actually the same as that of this proposal - pay seasonals to go to basic training. However, for safety and efficiency, doing so at FLETC makes much more sense.

The Need for a Sustainable Solution

The current ProRanger academy at San Antonio is running with a total of four students. Three NPS-paid staff members are running a seasonal law enforcement training program for four students. While hopefully an exception, this resembles the fate of similar initiatives in the past. In the meantime, the new requirement to make SCEP hiring competitive places additional challenges on these programs.

The NPS has a long history of attempting various initiatives to attempt to circumvent the roadblock to diversity set up by the seasonal academy system. All of them are admirable, but it is questionable whether they are sustainable. History indicates otherwise.

Perhaps the sustainable long-term solution to diversity will not be found in expensive intake programs. Perhaps it will be found in eliminating the roadblocks that deny access to the disadvantaged.
Part Three: The Hidden Costs of the Status Quo

Maintaining the Status Quo by Ignoring the True Costs

For an agency that knows so much about the shortcomings of its current system, the NPS has gone well out of its way to maintain the status quo.

Despite 35 years of change in the demographics of society, in numbers of applicants, in the standards of law enforcement training, DOI concern over the quality of seasonal training, and multiple ethical issues, the NPS has continued to invest in seasonal academies. The NPS is now doubling down its investment in the form of accreditation, “bridge” programs, and the re-born “ProRanger” academies. The more inefficient the system has become, the more the investment continues.

The conventional wisdom says this system is cost efficient, but the actual costs to the NPS are concealed by the ways we have shaped our organization to share the burden of “supporting” the seasonal workforce.

For example, the seasonal ranger academy at Northern Arizona University relied on one hundred NPS employees to make up its training cadre for seasonal park rangers. A similar academy in Santa Rosa, California, relied on rangers from Golden Gate NRA and other parks not only to teach students, but to serve on its board of advisors. The same is true at parks in Washington State, and throughout the country. Every seasonal academy has some degree of NPS involvement and support. The ProRanger programs are designed with full-time NPS FTE on site. In the past, the NPS has even made direct payment to seasonal academies and provided firearms and equipment to support seasonal training. Academies ask for such support on a regular basis, including the week this was written.

Supporting the seasonal academies requires the FTE salary of a program manager at FLETC and associated staff at FLETC, with associated costs to travel to the schools and re-accredit them every three years, and cost to develop and update the seasonal curriculum. Costs occur to parks supporting seasonal academies by sending staff to serve as instructors and staff advisors -- plus the NPS funding of staff positions at some of these academies in the "Pro-Ranger" model.

The NPS pays to send rangers to FLETC to become firearms, defensive tactics and driving instructors. This is done both to provide in-service training and to support training at seasonal academies. This cost of supporting the seasonal academies is hidden in the advanced training program budget of the NPS. Why is one out of 5 permanent LEOs in the NPS a firearms instructor? (300 instructors as of September, 2011.) These support the seasonal academies and the extra training required for seasonal employees. How much does this cost the NPS?

And because all seasonal academy students aren’t going to be NPS employees, a certain percentage of the money the NPS invests in seasonal academies is wasted from the get-go. When seasonal employees quit the NPS after only one
season, this investment becomes even less efficient. The number of seasonal employees that quit the NPS after one season has increased from 20 percent to over 30% since 2005, despite quality improvements in seasonal academies. This is training money wasted. With greater control of applicant selection and training, we can better select employees more likely to remain with the agency, better monitor retention, and ensure cost effectiveness.

How inefficient is the system overall? The NPS maintains a network of about 10 seasonal academies to deliver a total of less than 150 seasonals a year, on average, since 2006. That’s about 15 seasonals per school that make it to the NPS each year. The rest of the training effort is wasted on employees that will never become NPS employees. Of the 150, 30% will quit after one season. In other words, the 10 schools turn out about 10 seasonals each every year that will last two seasons.

The more the NPS invests in improving seasonal academies, the more cost effective it becomes to send employees to FLETC.

**An Older Ranger Workforce with Less Useful Experience**

The NPS employs nearly 1500 permanent commissioned rangers. How many are under age 25? Eight. All eight are 24.

Because of the seasonal hiring system, and because the NPS waits two years to send permanent employees to FLETC, the average age of an NPS student at FLETC is age 30. This chart shows the age of permanent employees in 2011:

![Permanent Employees Chart](image)
The typical age of a seasonal academy student is 23. What would happen if the NPS was sending 23-year-olds to FLETC instead of 30-year-olds?

- **Reduced injuries & related costs:** 23-year-old employees are less injury prone than their 30-year-old counterparts, and heal faster. FLETC has data that correlates injury rate to physical fitness based on PEB test scores. NPS commissioned employees generally don’t increase their level of fitness during their careers. Generally it declines. The injury rate at FLETC for the UPTP training program is greater than that of the CITP program because the student pool for the UPTP is older and less fit. FLETC statistics show that injury rates increase as PEB scores decrease, and that PEB scores decline as age increases. In addition, improving the selection process for seasonals will ensure accurate fitness testing prior to entry. Currently a number of NPS employees aren’t fit enough to attend FLETC, but are still performing law enforcement under their seasonal commissions. Selecting young fit candidates then sending them immediately as seasonals to FLETC will reduce injuries and associated costs, eliminate the waste involved in unfit employees not being able to attend FLETC.

- **Reduced hardship on employees and their families:** Many permanent employees with the NPS enter FLETC at age 30. At that point in their lives they are commonly married and have growing families. The strain of being away from a spouse with infant children is a significant hardship on these families and frequently hinders their training. In today’s workforce 23-year-olds are much less likely to be in this situation.

- **Increased productivity of the seasonal workforce:** Rangers who attend FLETC are better able to perform the more complex duties of their positions than rangers attending seasonal academies. A seasonal ranger who attended FLETC would be able to handle more complex investigations with less supervision, do it safer, and do it more effectively. The rise in productivity alone over the career of the employee would in itself make training at FLETC worthwhile. In addition, first year seasonals would have their backgrounds done at FLETC, and would arrive in their parks able to work, as opposed to time wasted in the current system.

- **Increased experience and productivity for all commissioned employees:** Training at FLETC is a prerequisite for many advanced opportunities for permanent rangers. For example permanent rangers can’t be on SET Teams, attend law enforcement instructor training or other advanced training, or lead complex investigations until they attend FLETC. By getting this prerequisite out of the way when employees are 23 instead of 30, this opens a huge window of opportunity for employees to gain experience at a younger age. How huge? Currently employees reach full performance at age 30 and must retire at age 57, a career of 27 years. By being trained at age 23 and getting permanent status at age 25 (two years is a typical wait) the typical career would be 32 years, meaning senior NPS leaders would be over 18% more experienced.
• **A larger effective permanent workforce:** Having FLETC completed for all permanent and seasonal employees opens a large new pool of employees available for SETT, for details to critical assignments, etc. Currently over 170 NPS permanent employees are waiting to go to FLETC. If they had already been trained as seasonals, there would be 170 additional field level resources available to the NPS. At times there are over 50 commissioned employees at FLETC for basic training, 95 percent of them already with Type II commission. How much would it be worth to the parks to have these employees, at FLETC or on the waiting list, out in the field as fully functional rangers because they went to FLETC as a seasonal?

All of these improvements are significant on their own, and justify making the change on their own merit. From a bigger picture, though, how does one quantify what the cost is to the NPS for delegating the selection of its law enforcement applicant pool to the seasonal academies, then having to try and overcome this process through unsuccessful diversity initiatives? What is the cost to the NPS for not being able to watch its own trainees perform in basic training, and ensure quality control? What is the risk to the NPS for not being able to act on behaviors found at the seasonal academies? The NPS has made great steps to recognize and mitigate known risks; it has so far not recognized this less-obvious but very real risk.

Another risk that goes unmentioned is the high profile public reputation of the NPS. Do we want our least skilled, least prepared people making high-risk law enforcement contacts, risking public animosity and ridicule? Within the last half decade, major use-of-force incidents and conduct-related incidents involving seasonals have been on the front pages of local newspapers. It’s a matter of time before one of these cases makes national news and the reputation of the agency suffers greatly. Do we want the NPS to be the next target of media pundits because of heavy-handed or incompetent actions of our least-tested, least-screened employees?

**The Unfair Cost Burden of Hiring Permanents**

Looking at statistics over the last 8 years, twelve parks hire about 50% of all the first-time permanent rangers and pay their initial employment costs. Actually, 7 chief rangers and their supervisors are responsible for selecting 40% of all first-time permanent rangers. Their standards and practices have a massive influence on who enters the ranger workforce, and therefore, who will be the supervisors and leaders of the future.
Forty percent of new hires needing FLETC come from these parks:
So while one of these parks may fund six employees a year to attend FLETC, Shenandoah, for example, has paid for one permanent employee to attend FLETC in the last decade, about the same as the Blue Ridge Parkway. InsideNPS regularly features recruitment for lateral reassignments at the GL-9 level as parks seek to avoid the cost of FLETC. If there was less of a penalty for being an intake park – if you didn’t lose the cost of sending employees to FLETC – perhaps more parks would be willing to bring in inexperienced employees. At least the cost burden on the high volume intake parks would be shared, and there would be a larger interest in solving their turnover issues.
Part 4: A Comprehensive Solution For The Second Century of NPS Rangers

The solution to all of these issues comes from adopting the hiring, training and staffing model used by just about every other Federal law enforcement agency – providing basic training at the beginning of an employee’s career.

Send seasonal employees to FLETC.

What would happen if WASO hired all first-time seasonals and sent them to FLETC as seasonal employees? Parks in the field would then select their new seasonal employees from among these FLETC graduates.

FLETC has changed. They will take federal employees regardless of career status. The NPS just hasn’t asked for 30 years to see if their position had changed.

Wouldn’t sending seasonal to FLETC cost more? Not really. If the NPS pays to train seasonals at FLETC, it doesn’t need to pay to train permanents. That saves the NPS money. Actually, quite a lot of money. The cost is somewhat hidden.

Let’s look at the numbers. The NPS hires about 100 brand new seasonal law enforcement rangers a year. It hires about 70 new permanent law enforcement rangers a year. About 90-95% of permanents are former seasonals. About 75% of seasonals eventually become permanent employees.

Instead of training 70 GL-9 permanent employees a year, the NPS would train 100 GS-4 seasonal employees a year at FLETC. The total cost to the NPS would be less. The GS-4 salary is much less than that of a GL-9. And because the GS-4s in training would be seasonals, their cost in training includes much lower benefit costs.

An additional savings comes from eliminating the cost to the NPS of maintaining the seasonal academies. No costs for re-accreditation of 12 schools every 3 years. No costs to provide instruction, or subsidize instruction. No ethics issues.

Because parks wouldn’t “lose” permanent employees to FLETC for training, they would not need to backfill and pay overtime to GL-9s to cover the shifts of the employees at training. Training is conducted at the absolutely lowest possible salary and benefits cost.

Lastly, as an additional cost savings, parks could begin the field training process the minute their new FLETC-trained seasonal arrives in park. This could be done in a taskbook format. When an employee converts to permanent status, they could complete an abbreviated Field training program at one of the existing field training parks for final evaluation.
In summary, the NPS is willing to spend money to support a network of over 10 seasonal academies with a program manager, accreditation manager, over a hundred field instructors providing training and oversight -- and fund even more complex recruitment programs -- to avoid sending 20 or 30 GS-4 employees a year to FLETC, even though the overall cost would be lower and productivity and worker satisfaction would be increased. To avoid sending seasonal to FLETC (and saving money), the NPS is willing to accept lower quality of law enforcement training and the risks to employee and public safety that comes with it.

Is this system of hiring and training, designed in the 1970s, really where we should be in 2011?

**How would this work?**

For the seasonal employee, the application process would be the same. They apply through the existing seasonal system in USA Jobs. But now, everyone could apply, not just those who could afford the $5000 tuition.

The NPS would establish a selection team modeled on the intake program used in the InterMountain region, and that developed by the NPS at FLETC as a prototype service-wide intake program. The selection team would interview applicants and check references. Rather than hundreds of untrained supervisors selecting seasonals in a hurry, the team would do it right. Applicants that can’t meet medical standards, can’t pass an initial background review, and can’t pass psychological screening don’t get selected to go to FLETC.

Those selected would travel to FLETC as a seasonal employee of WASO. If FLETC is their duty station, then travel costs to FLETC become a thing of the past.

If one is concerned over the 1039 hour limit for hiring seasonals, training hours don’t count toward the hours that limit seasonal employment, so they will be eligible to work.

During the time that students would be in training, parks in the field will be able to cooperate in applicant selection to meet the needs of parks and regions. Rather than compete for applicants in a rivalry, regional oversight will prioritize which parks get to fill which vacancies with which of the available seasonals.

If a trainee and park agreed that they were sponsored or recruited by a specific park for a specific need, this should strongly influence the placement by the placing officials. Failure to do this will alienate both the recruiting park and the applicant. Applicants should be aware that they may be offered other seasonal assignments to meet service-wide needs. In subsequent seasons, they would be able to return to their original park or apply to others.

Injuries are an unfortunate part of training, and one might be concerned about workers comp issues in training. Whatever happens, it will be better than the current system that provides zero protection to students undergoing training at seasonal academies on their own time. While training as NPS employees at FLETC, seasonals would be fully protected by workers comp.
Some may ask “How do we know that WASO will select and train good people.” How do we know now that the seasonal academies select and train good people? The NPS has given up control of its applicant pool to the seasonal academies. This takes it back. Parks and regions would have a strong interest in supporting training at FLETC, visiting and screening students, and helping to “onboard” them by providing training in the NPS mission and values.

Why keep seasonals? Why not hire people as subject to furlough (STF)?

The National Leadership Council and the Director of the NPS have made it clear on multiple occasions that they believe parks need a seasonal workforce. Initiatives to move to a STF workforce have had limited success. This proposal would certainly work with STF or full permanent employees.

Indeed, this proposal makes hiring STF employees easier. A deterrent to STF hiring has been that STF employees eventually go to FLETC, and then move to full time jobs, and the training “investment” by the park for FLETC is lost.

Won’t the BLM and Forest Service hire NPS FLETC-trained seasonals?

Yes, but they are already hiring NPS-trained employees. This will make our employees more attractive to other agencies, but it also makes our employees much more attractive to the NPS while saving us money. Perhaps this will motivate parks to develop hiring strategies to get seasonals permanent status faster, or look at STF positions or other alternatives to retain employees. That aside, there is a finite pool of BLM and Forest Service jobs for NPS employees to move into. This measure doesn’t increase that number.

Won’t this shut down the Pro-Ranger programs and their attempt to bring in a diverse workforce?

No. The only difference would be that their students would receive training at FLETC instead of a seasonal academy. Their operations could otherwise continue as planned. In fact, this enables many more SCEP students to be able to come to FLETC, and encourages more such programs.

What are the other benefits?

1. **Making the salary cost of training lower and more fairly distributed.**
   Not all parks share the costs of training the commissioned workforce. About 40 percent of NPS trainees come from only 7 parks – parks with recruitment and retention problems. These 7 parks fund nearly 40% of hiring, training and equipping all new employees for the NPS. Some large parks without retention problems never hire employees that haven’t already been to FLETC, passing the training costs to these “intake” parks. This is hardly equitable, as many parks eventually receive benefits of these trained employees. Under this proposed system, the NPS can develop an equitable program for spreading the costs of hiring and training new employees -- the entire service benefits, and should share in the cost if no new funding sources are available.

2. **Reduced liability through better training records management.**
   Currently, the NPS does not hold any training records from the seasonal academies – test scores, firearms scores, what students were taught, and who taught them. These are held at the seasonal academies, and some retain records longer than others. There is no MOU that give the NPS
access to the records of the private citizens of these schools. Under the proposed system, all training records will be at FLETC because the training is at FLETC. FLETC retains training records for 40 years.

3. Increased advanced training opportunities
   Training in other ranger competencies other than law enforcement has been vanishing in recent years. By implementing this idea, time would be available for other advanced-competency training for the permanent workforce should this be a management objective.

How can the NPS implement this?
   Implementation can be phased in over a few years. Begin with a pilot program of 3-5 individuals and test to see how they fare, and whether they intend to come back. If the test is successful, next year increase it to 24. The next year double that. Implementation over 3-4 years would be relatively simple. Running dual systems is also possible over a longer term.

What about the existing seasonal academies?
   Many of these schools have been our partners for over 20 years. They have provided us a service in good times and in lean. At times they have been told that they would be going away, and at other times they have been embraced as essential partners. If it is determined that they are not our best solution, they should be phased out over a few years as the new program is phased in.

What about older applicants? Since seasonal jobs aren’t age restricted, won’t they be able to go to FLETC, but be ineligible for permanent employment?
   Yes, we still have older people wishing to be employees, and that put themselves through the seasonal academies, and now they could come to FLETC. If they can pass the requirements, they would become a seasonal, just like now. And just like today, they would work as seasonals, but would have no promise of a permanent job. However, as seasonals, they would be better screened, better trained, and more productive.

What additional costs will there be at FLETC?
   Training 140 or so seasonals a year will require the NPS to provide 3 additional instructors to FLETC. The NPS will be required to add 1-2 additional instructors anyway to make up for the growing waiting list. Note that as the seasonals who were trained at FLETC began to get permanent jobs, and the backlog of current recent hires was cleared, 90% of new permanent hires would not need FLETC. Therefore the training load would eventually stabilize as something lower than the transition period - essentially seasonals plus 10% of permanent hires that were not former seasonals.

What should the NPS do about field training?
   The NPS currently sends permanent employees that complete academy training at FLETC to an 11-week field training program held in over 20 parks across the country. Alternatives are available for continuing field training for academy graduates. First is to leave field training the way it is - for permanent
employees. Ideally for cost-saving reasons stated earlier, it should occur within the probationary period of the employee.

The second choice is to make the leap of providing field training to seasonal employees at WASO expense. While this is the best thing to do in terms of ensuring quality and safety of the workforce, and mitigating risk, it is also the most expensive alternative in times of very tight budgets. Unlike the cost savings that come from sending seasonals to FLETC, there is less apparent savings in sending them to field training.

There is a compromise that provides some field training. Using a taskbook to provide limited field training to seasonals in-park when they first are hired, then providing a shortened field training experience when they are newly hired into a permanent position provides some of this important training early, and saves costs to help pay for sending seasonals to FLETC.

In addition, travel costs to field training can be reduced by adopting the training location policies used by the BLM and FWS. Currently, the NPS sends trainees to field training parks away from their home units, rather than training at home. There are two justifications for this. First is to ensure that the trainees receive an unprejudiced evaluation of their skills. A home park that has hired a trainee and worked them for over two years as a permanent and has gone to the expense of sending them to FLETC may tend to let a trainee slide on some problems during field training because they have so much invested in the employee. The BLM and FWS/refuges, send new hires to FLETC and field training, then go to an available field training site. If that site is the new home of the employee, that’s fine, as there is an incentive to evaluate the trainee properly and remove them during their probationary period if they fail their Field Training and Evaluation program (FTEP.) This would save hundreds of thousands of dollars in travel and per diem annually, and result in greater employee satisfaction – being able to train at home.
Part Five:
The Burden of Proof

This paper makes a number of assertions about the current NPS law enforcement program, and offers solutions based on current standard practice in the law enforcement community. In arguing the positions in this paper, there are not many scientific studies that support either side of the many positions expressed here.

What then is the standard of proof for whether the NPS program for hiring and training is adequate, or not?

If a law enforcement agency deviates from nationally recognized standards and practices, it is up to the agency to prove that its methods are meet or exceed the standard. The NPS deviates from nationally recognized standards in hiring and applicant selection of law enforcement officers, and in the standards of training it provides.

The NPS is largely out of compliance with the Department of the Interior’s policy on applicant selection. The Departmental manual on law enforcement, 446 DM 2, states, “It is essential that the selection process utilized throughout the Department of the Interior (Department) be standardized to assure high professional law enforcement standards. Only applicants possessing adequate education and/or experience, aptitude and high moral character shall be employed as law enforcement officers.”

The DM states: Prior to appointment to a law enforcement position bureaus/offices will require entry level applicants to pass a medical examination, the Federal Law Enforcement Training Center (FLETC) Physical Efficiency Battery (PEB), and a psychological screen.

The NPS does not have a psychological screening program in place for seasonal or permanent employees, and is out of compliance.

The DM further states: Applicants who qualify in any required written examination and meet the education and/or experience, medical and physical requirements for law enforcement positions shall be personally interviewed. The number of applicants interviewed will be based upon the number of law enforcement positions to be filled. The Law Enforcement Administrator of each bureau/office will designate qualified law enforcement officials to conduct these interviews.

The Law Enforcement Administrator of the NPS has not done this. I know, because I was recently the Law Enforcement Administrator of the NPS. I also know that no standardized interview system exists that attempts to determine if a candidate is suited for law enforcement, or is able to use deadly force if necessary.

In my training role, I ask classes full of rangers about their work history. In my last class of 16 NPS rangers, none received an interview to determine suitability for law enforcement as a seasonal. One student observed, “They asked me two questions: Was I still available, and when could I start.”
One student in the same class was shocked. “They didn’t interview me at all. They just kept trying to sell me on the park. Like I needed to be sold.”

In another class full of permanent rangers, only one was interviewed to get their permanent job.

The DOI policy is accord with standards and practices of other law enforcement agencies -- candidates are screened and interviewed before being placed in law enforcement positions. This is the same at Federal, State and Local levels. The standard for all but the smallest law enforcement departments is screening and interviewing.

An important part of the screening process occurs at the training academy. Gordon Graham is a retired California Highway Patrol captain, an attorney, and risk management expert that has provided training to NPS employees on many occasions for well over a decade. Mr. Graham advocates from a risk management standpoint that a critical role of training academy is that it gives the agency an opportunity to view candidates for law enforcement, and to screen out employees that would be a liability to the agency. He rejects delegation of this responsibility to other entities as an unwarranted risk. He cites the example of his former agency, the California Highway Patrol (CHP), merging with the California State Police. The CHP runs its own academy, and uses it as part of a comprehensive screening process for new employees. The State Police did not. When the agencies were merged, a number of State Police officers were dismissed, arrested, or otherwise had performance issues due to the lower standards of their former agency. Mr. Graham believes delegating training to a third party creates a greater risk of hiring sub-standard employees, and therefore has serious issues with the NPS seasonal academies and proposed bridge program.

The Commission on Accreditation for Law Enforcement Agencies (CALEA) requires one standard for all officers in an agency vested with law enforcement authority.

An article in the International Association of Chiefs of Police’s Police Chief magazine, January 2012, details how an agency sets up a workforce of “part time, paid, reserve police officers.” It details a thorough plan of interviews, polygraphs, and standardized training for temporary officers – the same as it provides for permanent officers, in compliance with CALEA standards.

Not all agencies with part-time officers are in compliance with this standard.

If the NPS is to differ with national standards and practices, it needs to prove to unbiased observers that its standards and practices are more stringent or have a better result than the standard, or that the standards don’t apply. It has never attempted to do so.

The principle argument that the NPS has made is that of funding and logistics that the agency can’t afford to screen its law enforcement officers.

This is not a comfortable position to defend. In the second century of NPS rangers, the NPS cannot afford to place poorly screened officers into law enforcement roles.
In Conclusion

These concepts are a radical departure from the past.

The numbers I’ve used and the consequences of these changes should evaluated independently, and unintended consequences explored.

I’m not suggesting that this proposal be adopted without testing it in a pilot program. It should be expanded it only if it merits.

However, it is abundantly clear that the existing system was not designed to meet the current needs of the NPS, does so only marginally, and only through a complex patchwork of solutions that do not meet with current best practices and standards in law enforcement used by other Federal law enforcement agencies.

America has changed since the 1970s when the current seasonal academy and selection system was established.

It is time to focus on a sustainable solution based on best practices for the Second Century of Park Rangers.
Summary of Risks of the Current System

- The application process and costs of seasonal academies keeps out qualified people, and is a deterrent to diversity.

- The quality of training at seasonal academies is less than at FLETC, and can never be made as good.

- Entry-level NPS field law enforcement officers are given a shorter and lower-quality academy with no field training -- the lowest level of training given to any federal uniformed officer.

- Seasonal rangers are only given Type II commissions with restrictions in policy. These commissions are managed by individual parks rather than by WASO as with Type I commissions. The issues this causes are both serious and plentiful. This proposal would eventually eliminate Type II commissions.

- Permanent LEOs attend basic training often years into their careers, are less productive, more costly to terminate due to poor performance.

- Lack of seasonal academy oversight by the NPS places the agency at risk.

- Seasonal academies haven’t been able to apply NPS standards to terminate students, or forward knowledge of disqualifying factors to NPS. This is improving, but there is way to ensure quality.

- Oversight of the seasonal applicant pool and oversight of training is delegated to non-government entity.

- Inconsistent training between seasonal academies and FLETC creates dysfunction in the field.

- Seasonal academies are resistant to meeting higher standards of training.

- Ethics questions exist over teaching at and funding support for these programs.

- The seasonal academies are a barrier to recruitment of diverse or disadvantaged candidates.

- The dysfunctional seasonal hiring process leads to inefficiency and violation of policy in applicant selection, and increasing risk to the agency.

- Improper selection/screening by seasonal academies wastes students’ money.

- Training of students not eligible or interested in NPS employment wastes taxpayer money.

- True costs of supporting seasonal academies are concealed by being spread out, and are accepted or ignored.
• Seasonal academies hold back the productivity of the NPS workforce.
• Sending employees to FLETC at an older age increases injuries.
• Sending employees to FLETC later in their career increases hardships on families.
Appendix 1:

Training Cost Savings

1. Basic Training Travel Savings:

Travel and per diem are paid to permanent rangers to attend FLETC. Seasonal rangers hired and duty stationed at FLETC for training would not be paid travel and per diem, although they would still be housed and fed at FLETC.

Currently, the tuition and travel/per diem cost of sending permanents to FLETC are $4000 room-and-board plus $3000 travel per student per year.

Total cost for training the 100 permanents we average a year is $700,000. Out of this, the total travel cost is $300,000.

$700,000 is the equivalent tuition for 175 seasonal rangers trained at FLETC who would not be paid travel and per diem, but would report to duty at FLETC.

- If fewer than 43% of these 175 employees leave the NPS without becoming permanent or long-term seasonals, we break even (that’s 75 out of 175). Anything greater than 43% saves money. Based on the history of 2005 seasonal hires, 50% of them will become permanent. However, by investing in seasonals, they become more valuable employees. It is then likely that the NPS will attempt to hire seasonals that are more eligible and more likely to become permanent employees, and work to convert them to permanent employees more diligently. Every college could become a ProRanger program.

- The average annual hire since 2005 is 148 seasonals. The total hiring cost for that would be $592,000, or less than the $700,000 cost of training 100 permanents at FLETC.

2. Salary Savings During Training:

It is cheaper to pay a GL-4 seasonal to attend training than a GS-9 permanent.

Salary of GS-4 seasonal park ranger for 16 weeks (no benefits): $16/hour for 640 training hours plus 30 hours of overtime = $11,000 (x 7.85% benefits) = $11,900 cost per student.

Salary of GL-9 permanent park ranger for 16 weeks (with benefits): $23.50/hr x 640 training hours plus 30 hours of overtime = $16,200 (x 50% benefits) = $24,300 cost per student. **(A $12,400 savings per student.)**

So the cost of meeting the academy training cost of the workforce by training 100 permanent park rangers/year (average permanent hires per year since 2005 vs 148 seasonal park rangers/year =
Meeting the academy training needs of the workforce by training 148 seasonals a year cuts $670,000 salary costs during training.

It’s critical to note that the $1.76 million in salary costs for sending seasonal rangers to FLETC are not currently budgeted -- it’s a new cost. This additional cost offsets costs to the NPS for operating the seasonal program, and to parks for backfill to send permanent rangers to FLETC, costs to the NPS for travel to FLETC, costs due to the inefficiency of permanent rangers not being able to work at full performance duties due to lack of training (currently 180 permanent rangers – 12% of the permanent workforce so hindered).

3. Costs to Parks for sending permanent rangers to FLETC:

Parks must make up for permanent rangers being sent to FLETC either by:
1. Not backfilling the position. Work gets left un-done or is shared by other employees
2. Bringing on a seasonal employee to cover for the employee at training.
3. Backfilling as necessary to cover for the missing employee.

There is no set mechanism that parks use to deal with this situation. It may vary from district to district within a park. Therefore it is difficult to determine how much is direct capital expenditure versus lost productivity cost.

4. Other Annual Costs of Supporting Seasonal Law Enforcement Training Program

- Training Program Manager Salary/Benefits GS-13 (90% of position) $116,000
- IT Specialist (50% of time currently supports SLETP) $42,000
- Supt. Salary (10% of time overseeing SLETP) $18,000
- Travel To SLETPs $15,000
- Pro-Ranger academy salaries for LE programs:
  - Two GS-12 (115k x 2) and 1 GS-11 ($86k) $316,000

Total direct salary currently committed to SLETP: $507,000

The current NPS-LETC OFS & PMIS request for funds to better manage SLETP through dedicated staffing = $575,000. This would not be needed if SLETP are eliminated.

It is extremely difficult to calculate the cost to the NPS employees for employees teaching/supporting at their local SLETP on duty. Here is an estimate for one school, Northern Arizona University. About 80 percent of class time is taught by NPS employees on government time.

400 hour program taught by GL-9/4 at $40/hour = $16000 x 80% = $12,800 per year. Two classes a year = $25,600 salary cost per year for instruction time. Does not include salary for travel time, or travel costs.
Each of the 9 current schools has NPS instructors on government time to some extent. Estimating (on the low side) that these schools use NPS employees for only 25% of their instruction of two classes a year per school on average:

100 hours @ $40/hour = $4,000 x 2/year = $8,000 x 8 additional schools = $64,000/year. Add the $25,600 from NAU, to get:

**Total estimated NPS instructor salary for SLETP:** $89,600.

5. **Savings from reducing Field Training**

Cost savings from reducing FTEP for FLETC-trained seasonals with seasonal task book complete (reducing from 11 weeks to 9 weeks)(reduction in FTEP staff salary per trainee):

$945,000 for 11 weeks (currently budgeted)
$774,000 for 9 weeks (better initial screening and training plus seasonal taskbook)

**Savings of $171,000.**

Savings from adopting BLM/FWS field training travel procedures: **$130,000**

Additional savings from providing field training earlier in the career of employees have not been figured in here. Sending an employee to FTEP as soon as they become permanent, rather than after a few years into their career, means employees in FTEP draw a lower salary, and the program costs are less.

**Total FTEP Savings:** **$301,000**

**Total Annual Savings:**

1. **Travel:** 108,000
2. **Salary:** 670,000
3. **Cost to parks for backfill:** Unknown
4. **Cost of supporting SLETP:** 596,600
5. **Reduction of FTEP:** 301,000

**Grand Total Annual Savings:** **$1,675,600**

Additional cost of salary for seasonal students: **$1,760,000**
Additional FLETC costs for detailed instructors: **$345,000**
Appendix 2

Cost & Logistics of Training Center Operations

1. 148/year = 30 higher than record 120/year
2. Training at both Glynco & Artesia
3. Artesia staff to include program manager (take one from Glynco & detailed instructors)
4. Administration, Firearms & Commissions primarily at Glynco
5. 3 more detailed GS-12 instructors owed to FLETC(@115k /year)

Appendix 3

What we get for our investment:

74 more rangers in the field for 28 weeks a year (typically 74 permanents attend FLETC and FTEP each year for 16 and 11 weeks respectively, plus travel time)

670 more Type I commissioned employees of our 2000 commissioned employee workforce (a 50% increase in Type 1 commissioned employees)

- 170 more Type I commissioned permanent employees (by eliminating the waiting list, to get to FLETC, currently at 170 employees.)
- 500 more Type I commissioned seasonal employees.

Zero permanent employees injured at basic training.

Zero permanent employees losing their jobs years into their permanent careers by failing at FLETC.

Control of who becomes an NPS commissioned ranger.

Transfer of burden of permanent employee hiring costs on primary intake parks (JEFF, INDE, BOST, LAME, EVER, GLCA) to a shared cost service-wide.
Appendix 4:

Conversion Time of Seasonals to Permanents, Retention Efficiency of Seasonal Programs, & Unmanaged/Unforeseen Growth of Permanent Workforce Training Needs

The following data shows the percentage of new seasonals that become permanent employees, and the training efficiency of the Seasonal Programs.

I define “retention efficiency” in this case as the number of new seasonal employees that return for more than one, or become permanent employees. A lower retention rate of seasonal employees, either as returning seasonal or as permanent employees, makes the SLETP less cost effective.

Information is gathered from the LESES commission office at FLETC.

"The purpose of this data was to determine how many seasonals only worked one year. It was also determined how many seasonals continue on to work for the NPS in a permanent capacity. To glean these stats, I made a copy of the badge/weapons database at the Commission Program Office at FLETC. It is essentially a snapshot of our workforce at any given day/year. The numbers reflected below are backed up with hard data, as in the names of all 110 seasonals for 2005 (or any other year) are available for review if need be. Also keep in mind, “seasons” may be winter, summer, or an emergency 30-day hire appointment; an employee could do several seasons within one year. Should you have any questions, feel free to contact me at 91-267-3554. JJ Martin”

2005

Snapshot date of September 9th, 2005 was used to get these stats. (high of year)

Total # of seasonals employed on September 9th was 375

Total # of seasonals employed on December 31 (low of the year) none available

Number of first time seasonals in calendar year 2005 was 110

Of those 110 new seasonals:
• 56 went on to become permanent (50.9%)
• 21 worked only one season (19.09%)
• 13 worked two seasons (11.81%)
• 9 worked three seasons (8.18%)
• 7 worked four seasons (6.36%)
• 1 worked five seasons (0.9%)
• 1 worked six seasons (0.9%)
• 2 worked seven seasons (1.8%)

2006

Snapshot date of August 16th, 2006 was used to get these stats. (high of year)

Total # of seasonals employed on August 16th was 387

Total # of seasonals employed on December 31st was 253

Number of first time seasonals in calendar year 2006 was 124

Of those 124 new seasonals:

• 58 went on to become permanent (46.77%)
• 23 worked only one season (18.54%)
• 15 worked two seasons (12.09%)
• 10 worked three seasons (8.06%)
• 6 worked four seasons (4.84%)
• 7 worked five seasons (5.65%)
• 3 worked six seasons (2.42%)
• 1 worked seven seasons (0.8%)
• 1 worked eight seasons (0.8)

2007

Snapshot date of August 31, 2007 was used to get these stats. (high of year)

Total # of seasonals employed on August 31st was 389

Total # of seasonals employed on December 31 (low of the year) was 266

Number of first time seasonals in calendar year 2007 was 120

Of those 120 new seasonals:
• 47 went on to become permanent (39.16%)
• 18 worked only one season (15%)
• 21 worked two seasons (17.5%)
• 14 worked three seasons (11.67%)
• 11 worked four seasons (9.17%)
• 6 worked five seasons (5%)
• 3 worked six seasons (2.5%)

2008

Snapshot date of August 31, 2008 was used to get these stats. (high of year)
Total # of seasonals employed on August 31st was 464
Total # of seasonals employed on December 31 (low of the year) 300
Number of first time seasonals in calendar year 2008 was 178

Of those 178 new seasonals:
• 47 went on to become permanent (26.4%)
• 41 worked only one season (23.03%)
• 27 worked two seasons (15.17%)
• 34 worked three seasons (19.1%)
• 16 worked four seasons (8.9%)
• 7 worked five seasons (3.9%)
• 6 worked six seasons (3.34%)

2009

Snapshot date of August 31, 2009 was used to get these stats. (high of year)
Total # of seasonals employed on August 31st was 482
Total # of seasonals employed on December 31 (low of the year) 302
Number of first time seasonals in calendar year 2009 was 167

Of those 167 new seasonals:
• 22 went on to become permanent (13.17%)
• 54 worked only one season (32.34%)
• 72 worked two seasons (43.11%)
• 14 worked three seasons (8.38%)
• 4 worked four seasons (2.39%)
• 1 worked five seasons (0.59%)

2010

Snapshot date of August 31, 2010 was used to get these stats. (high of year)

Total # of seasonals employed on August 31st was 511

Total # of seasonals employed on December 31st was 309 (low of the year)

Number of first time seasonals in calendar year 2010 was 189

Of those 189 new seasonals:

• 15 went on to become permanent (7.93%)
• 63 worked only one season (33.33%)
• 93 worked two seasons (49.20%)
• 17 worked three seasons (8.99%)
• 1 worked four seasons (0.53%)

**Summary:**

<table>
<thead>
<tr>
<th></th>
<th>Worked only 1 season</th>
<th>Became Permanent by 2010</th>
</tr>
</thead>
<tbody>
<tr>
<td>2005 Hires:</td>
<td>19</td>
<td>50.9%</td>
</tr>
<tr>
<td>2006 Hires:</td>
<td>18.54</td>
<td>46.77%</td>
</tr>
<tr>
<td>2007 Hires:</td>
<td>15</td>
<td>39%</td>
</tr>
<tr>
<td>2008 Hires:</td>
<td>23.03</td>
<td>26.4%</td>
</tr>
<tr>
<td>2009 Hires:</td>
<td>32.34</td>
<td>13.7%</td>
</tr>
<tr>
<td>2010 Hires:</td>
<td>33.33</td>
<td>7.93%</td>
</tr>
</tbody>
</table>
Average new permanent hires by month (from available data, FLETC commission office)

2007: 5 (rate of 60/year)
2008: 6.6 (rate of 80/year)
2009: 10 (rate of 121/year)
1010: 8.1 (rate of 107/year)
2011: 9.6 (rate of 115/year)

Current and projected basic/field training budget: 6 students per month, or 72/year

Number of years since the basic training budget was adequate to handle that year’s hires: 5
**About The Author:**

Greg Jackson has been a commissioned law enforcement ranger with the National Park Service since 1985, and served as the agency law enforcement program administrator (Deputy Chief, Operations and Policy) from 2008 (acting) to 2010.

In 1985 he attended the Seasonal Law Enforcement Training Program at Santa Rosa Junior College, and worked as a commissioned seasonal ranger at Olympic and Yosemite National Parks. He has worked in permanent commissioned positions at Yosemite National Park and Lake Mead National Recreation Area where he was an assistant shift supervisor and district boating officer. He was a District Ranger at Santa Monica Mountains National Recreation Area, Branch Chief of Law Enforcement at Bryce Canyon National Park, and an instructor for the NPS at FLETC. He also served as manager of the NPS Basic Law Enforcement Training Program, Seasonal Law Enforcement Training Program, Advanced Training Program, Physical Fitness Program, and Honor Guard.

He served as a member if the workgroup established to implement the law enforcement program reform proposals of the International Association of Chiefs of Police, and as three-term President of the US Park Ranger Lodge of the Fraternal Order of Police.

**Credits**

This document represents a synthesis of ideas that have come from many sources through my career in the NPS. While its proposals are radical for the NPS, these practices are commonplace in both State and Federal law enforcement.

Many NPS employees, some known to me, and some not, have contributed to this document: some through editing, supplying statistics, citing examples, and others through bringing up good ideas. Circulating ideas to elected representatives that go against the tide brings the risk of criticism, even for protected speech. Those sources within the NPS who have helped me with this have requested that their names be kept confidential – a request I will respect. They are, however, at the highest levels of their profession. Chief Rangers, Superintendents, Regional Chief Rangers, Regional Law Enforcement Specialists, Program Managers, and others in the top ranks of DOI, the NPS, and the US Park Police. Many thanks to all.