MEMORANDUM FOR CHIEFS, OPERATIONS AND NATURAL RESOURCES MANAGEMENT DIVISIONS AND DISTRICTS AND OPERATIONS PROJECT MANAGERS

SUBJECT: Visitor Assistance Program - Policy and Guidance

1. This memorandum provides updated policy on a number of issues regarding the Visitor Assistance (VA) program as it pertains to visitor and park ranger safety. This action is a result of the comprehensive study of our VA program conducted by Dr. Charles Nelson, Michigan State University (MSU), and subsequent analysis by an Ad Hoc Team of Natural Resources Management (NRM) CoP members, USACE Safety and Occupation Health Office and Security and Provost Marshall’s Offices. The Ad Hoc Team’s response to the study is attached (Encl 1). This office forwarded a copy of the survey results and the MSU report to all MSCs on 12 October 2011. The survey and the report are also available on the Natural Resources Management Gateway at http://corpslakes.usace.army.mil/employees/visitassist/survey.cfm

2. Based on a thorough review of the study by the Ad Hoc Team, I have determined that a number of modifications to our VA program are necessary. However, the current legal authority and role of the USACE Park Ranger will remain intact with no changes. Park rangers will remain as regulation enforcers and perform duties as specified under ER/EP 1130-2-550, Chapter 6, Visitor Assistance Program which states, in part, that USACE park rangers are not law enforcement officers, nor do they carry weapons, perform searches, or detain individuals. The protection of facilities or the enforcement of rules shall always be secondary to the safety of Corps personnel, contract employees and visitors. I encourage everyone to educate our stakeholders, partners and visiting public about the role of the USACE park ranger.

3. The MSU report provided a number of recommendations regarding training, law enforcement agreements, communication equipment and patrol procedures.

   a. VA Training. ER/EP 1130-2-550, Chapter 6, establishes policies and procedures to ensure that NRM personnel receive adequate and timely VA training. Operations Chiefs shall ensure that all required training is offered to personnel that execute the VA program at the field level. The frequency with which this training is administered and selection of subjects taught shall be in accordance with established policy. Managers may offer training more frequently than required by policy and diversify subjects to fit regional and local requirements. VA training coordinators should place a greater emphasis on the following training: personal protection,
tactical communication (verbal judo), situational training, gang and drug awareness, and cultural diversity. Training coordinators may work with local law enforcement agencies, when appropriate, to acquire these and other select training. This office is working to obtain a waiver from the current conference approval requirements for MSC/District-sponsored visitor assistance courses and is also developing a standard approval package that can be used to help justify MSC/District annual refresher training courses.

b. Law Enforcement Agreements. I strongly encourage the continued use of law enforcement agreements when available and advantageous to the agency. Managers shall review and update agreements, as necessary, to ensure that patrols are scheduled at the appropriate times, frequency, and project/recreation areas. A greater emphasis should be placed on the service provider’s performance and its adherence to agreement specifications through more diligent and effective quality assurance processes. Law enforcement agreements can be used to obtain increased law enforcement services to meet needs during a peak visitation period, which is defined as any period during the year when visitation is sufficiently high to cause significant increase in risk to visitor welfare as determined by applicable district and or project office.

c. Communication Equipment. ER/EP 1130-2-550 establishes policy regarding required communication equipment. The MSU study concluded that, “Available, adequate and functional communications equipment is vital to visitor and employee safety”. This statement was strongly emphasized by rangers and managers, as was the inadequacy of communication methods in many situations. Operations Chiefs shall ensure that adequate and reliable communication equipment is readily available to VA personnel in support of natural resources management activities. Authorized communication equipment may include, but is not limited to: cellular or satellite phones and multiple frequency programmable scanning radios (fixed, vehicle-mounted and handheld). Managers shall place a greater emphasis on procuring and/or maintaining adequate and reliable communication equipment for use by VA personnel. Operations is partnering with the Corps Provost Marshall to further identify specific current problems and issues regarding the availability and reliability of effective communication equipment. Under a separate memorandum, a radio communications survey will be sent through all MSCs by 1 September 2012.

d. Patrol Procedures. ER/EP 1130-2-550 establishes policy and procedures with regard to surveillance of Corps projects, which includes routine, non-routine, scheduled and unscheduled patrols. Night surveillance by park rangers is a district option which may be considered, as necessary, to meet project and Corps objectives and provide adequate visitor security. However, overnight surveillance may place park rangers at greater risk. Effective immediately, all midnight - 6:00am surveillance (patrols) are prohibited, except under increased Force Protection conditions when security surveillance of lock/dam facilities is required, for emergency call outs (i.e. facility alarms, fires, etc.), or for an unusual incident regarding a visitor safety or resource protection issue.
CECW-CO-N
SUBJECT: Visitor Assistance Program – Policy and Guidance

4. The survey results confirmed that in some instances VA policies are not being fully implemented. Operations and NRM Chiefs, managers and park rangers are all accountable for executing the VA program within established policy - visitor and park ranger safety depends on it. I’ve asked the Park Ranger CoP Advisory Board and PROSPECT VA Course Instructor Cadre to develop a standardized peer review process to audit VA operations and measure success at the district level. This group will seek feedback from divisions and districts during development of the peer review framework and process. The Park Ranger CoP Advisory Board will also follow-up on a few other recommendations provided to me during the analysis of the survey data.

5. I appreciate the outstanding work that the Ad Hoc Team did throughout this study and for their thorough review and recommendations in response to the MSU report. I would also like to thank our park rangers, managers, and all our NRM team members for their support and execution of a great natural resources management program. I greatly appreciate the supreme effort and sacrifice our team puts forth daily to assist and protect our millions of visitors and resources.

Encl

RICHARD C. LOCKWOOD
Acting Chief, Operations
Directorate of Civil Works
PARK RANGER COMMUNITY OF PRACTICE (CoP) AD HOC TEAM

RESPONSE TO MICHIGAN STATE UNIVERSITY RECOMMENDATIONS FOR USACE VISITOR ASSISTANCE (VA) PROGRAM

MSU recommendations contained in Final Report of results for the 2010 Park Ranger & Visitor Safety and the 2011 Visitor Assistance Program Management Surveys

BACKGROUND

Park Ranger CoP Chair Freddie Bell assembled an Ad Hoc Team to review the MSU report of surveys results (authored by Dr. Charles Nelson), and to develop a response to the report’s recommendations for Mr. Mike Ensch, Chief, Operations, Civil Works Directorate, consideration. The Ad Hoc Team members are as follows:

Freddie Bell, Resource Manager, Chair of Park Ranger CoP, Nashville District
Steve Austin, Senior Policy Advisor for Park Ranger Activities, CECW-ON
Charlie Burger, Chief of Operations, Ft. Worth District
Jill Russi, Chief, Operations-Technical Section, Sacramento District
Phillip Brown, Operations Manager, Kansas City District
Bill Jackson, Supervisory Natural Resources Specialist, Lead PROSPECT VA Course Instructor, Vicksburg District
Aaron Wahus, Park Operations Manager, Savannah District
Kayl Kite, Conservation Biologist, Nashville District
Bonnie Bryson, Data Management Specialist, ERDC

INTRODUCTION

The Ad Hoc Team’s big picture response to the report can be summarized in the following items. Based on this report of results:

a. The role of the Corps Park Ranger will remain intact with no changes.
b. The current ER/EP 1130-2-550, Chapter 6, Visitor Assistance Program, contains authority for the improvements recommended herein, however accountability at the management level for implementing the VA program in accordance with National policy and guidance must be reinforced.
c. Mandatory and required training and equipment for VA personnel must be made a priority and a peer-review process must be established to measure success.
d. The changes implemented from the 1995 survey appear to have had a positive overall effect in terms of perception of Park Ranger and Visitor Safety.

Enclosure 1
Visitor Assistance Program – Policy and Guidance
Responses to specific MSU report recommendations as well as additional recommendations from the Ad Hoc team follow. One of the goals of the survey initiative was to have an outside entity take an unbiased look at the Corps Visitor Assistance (VA) Program.

The recommendations in the MSU report are based on the extensive experience and knowledge of the primary author, Dr. Charles Nelson. Understandably, this outside entity has offered some recommendations that do not reflect some of the complexities of the Corps VA Program policy. One of the Ad Hoc Team’s responsibilities is to review those recommendations within the context and authority of our agency VA Program and suggest responsive actions within that authority.

1. MSU REPORT RECOMMENDATIONS REGARDING “RANGER ALLOCATION OF EFFORT”

Recommendations for Ranger Allocation of Effort

- Increase time allocation for patrol, environmental stewardship and preventative/educational programs in VA duties, especially during peak recreation season. Perceived need for additional VA employees may be negated if more time is spent on patrol for existing VA employees.
  - Use increased patrol time to strengthen ties with visitors, following a community policing strategy of catching problems early and understanding the dynamic of the project’s community
- Decrease time for computer-based administration and fee collection, as both can be done by others who lack the authority to enforce federal regulations and training to coordinate with local law enforcement
- Streamline amount of information requested for shoreline management permits, real estate licenses, etc., and seek ways to allocate those tasks to others that lack the authority to provide patrol services.

AD HOC TEAM RESPONSE

The Ad Hoc Team concurs with the MSU recommendations for this category, with the exception of the statement, “May negate perceived need for additional VA employees if more time spent on patrol for existing VA employees.” If current levels of staff spend more time on patrol, some other duties will not be completed.

RATIONALE

The survey results quantify what has been heard anecdotally for years, that Park Rangers are devoting increasing amounts of time to computer-based tasks, and that they perceive that it is at the expense of VA duties.
AD HOC TEAM RECOMMENDATIONS FOR ACTION

Develop a multidisciplinary PDT to address this issue, capable of assessing and dealing with it at the grassroots level. This is a complex issue with varied causes and with several potential improvements (i.e., adjusting annual reporting requirement due dates of several NRM programs).

TIMEFRAME TO IMPLEMENTATION

Recommend establishment of PDT as soon as possible. Estimate 3-5 years for full implementation of their work. Park Ranger CoP Advisory Board will champion this effort.

2. MSU REPORT RECOMMENDATIONS REGARDING “CONTRACTED ENFORCEMENT”

Recommendations for Contracted Enforcement

- Make greater/more effective use of contract enforcement at every project with a VA program
  - Have an enforcement contract at every project with a VA program
  - Eliminate Corps night patrol after midnight and before 6AM and transfer all such duties to contract enforcement
  - Clear contractual wording and vigorous contractual administration with a focus on priority violations and patrol procedures tailored to individual Corps projects
- Increase emphasis on alcohol/drug enforcement in all enforcement contracts to the point where they are priority violations
- Increase the emphasis on visible presence of local law enforcement partners in all enforcement contracts to clearly demonstrate to the public the presence of certified law enforcement personnel at each project
- Provide joint training where possible with contract law enforcement and Corps VA personnel on-site by project focused on priority violations and patrol procedures per contract specifications
  - Emphasize situational awareness training for Corps VA personnel to limit dangerous encounters that need law enforcement response
  - Build contract enforcement officers’ confidence in park ranger info/intelligence
  - Focus training on joint response to problems that rangers and managers identified in the survey as most frequently threatening Corps employees and visitors:
    - Alcohol/drug related issues
    - Fights/assaults/disorderly conduct
    - Domestic violence
    - Traffic issues
    - Theft
    - Vandalism
AD HOC TEAM RESPONSE

The Ad Hoc Team only partially concurs with the MSU recommendations. The three items with which we do not concur and why:

a. *Have an enforcement contract at every project with a VA program.* There are both partner and budget issues that make this unfeasible. Some locations for instance do not have an adequate or available contractor, or the law enforcement agency does not want the administrative burden of a formal agreement although they do provide presence to Corps areas.

b. *Increase emphasis on alcohol/drug enforcement in all enforcement contracts to the point that they are priority violations.* “Presence” rather than “response” is the purpose of Corps Law Enforcement (LE) Agreements. Alcohol/drug enforcement should be the emphasis for law enforcement whether working under an agreement or not.

c. *Increase the emphasis on visible presence of local law enforcement partners in all enforcement contracts to clearly demonstrate to the public the presence of certified law enforcement personnel at each project.* As stated in b. above, “presence” is the purpose of Corps law enforcement agreements.

RATIONALE

The discussion in this section of the MSU report and the survey results make clear one important issue regarding level of authority. There is no justification provided by this report to further investigate change in the role of the park ranger.

The MSU Report seems to reflect some misconceptions about the Corps law enforcement agreement program, authority and purposes. Overall, the Ad Hoc Team agrees that some improvements to the specifications and execution of LE Agreements can be made.

RECOMMENDED ACTIONS

a. A policy memo from Chief, Operations, Civil Works Directorate, should be issued as soon as possible that emphasizes the following regarding MSU recommendations:

i. Encourages the priority use of project level funding to ensure that law enforcement agreements are adequately funded, and assures that from the agency side every effort will be made for available and adequate funds for this purpose. Also emphasizes strengthening and clarifying contract specifications where needed, along with emphasis on ensuring service provider’s performance and adherence to specifications through more diligent and effective quality assurance processes. Additionally, address the local definition of “peak recreation season” in the ER/EP to minimize limitations it presents for field offices.
ii. Eliminates routine patrol between midnight and 6 a.m.
   a. Clarifies provision in current ER/EP regarding “Night Surveillance”
   b. References the 9/11 memo and define the difference between it and the ER/EP
   c. References the Appendix G, list of Management Alternatives

iii. Emphasizes that the authority for joint training with contract vendors/law enforcement is already authorized by current ER/EP. Further emphasize that the training presented must be appropriate to our level of authority.

   d. The policy memo from Chief, Operations, Civil Works Directorate, should also address the following two additional recommendations from the Ad Hoc committee:

      i. Reemphasizes provisions in ER/EP and stipulate that Park Rangers should patrol alone only with functional and adequate communications equipment.
      ii. Reemphasizes the role of the park ranger, and that protection of property is secondary to personal protection.

   e. Initiates NRM Gateway additions and improvements:

      i. Updates the Law Enforcement Agreement page (currently titled as LE Cooperative Agreements) with additional sample specifications, quality assurance BMPs, success stories, etc.
      ii. Updates the training section of the VA page to include joint training success stories and sample curriculums. Develop a short video clip that can be shared.

TIMEFRAME TO IMPLEMENTATION

Recommend HQ policy memo be released prior to 2012 recreation season. Recommend Gateway updates completion within 6-12 months. Park Ranger CoP Advisory Board will champion this effort.

3. MSU REPORT RECOMMENDATIONS REGARDING “CRIME PREVENTION”

Recommendations for Crime Prevention

- Focus on situational crime prevention t each project with a specific set of improvements developed in cooperation with local law enforcement
  - Target hardening and access control to reduce theft and vandalism
    - Better locks
    - Improved lighting
    - Use graffiti barrier on vulnerable surfaces
    - More effectively regulate vehicular access
• Target removal to make crime less rewarding
  • Remove unnecessary high value targets such as sites where cash may be available
  • Better secure necessary high value targets such as maintenance facilities with tools, vehicles and equipment
• Increase risk to potential criminals by increasing eyes and ears
  • Strengthen campground host program
  • Strengthen Corps Watch program
  • Improve natural surveillance at key recreation sites including vegetative management, lighting, etc.
  • Facilitate observation of illegal behavior by visitors and law enforcement
• Further restrict primary facilitators of crime/violation such as alcohol and drug use through regulation and enforcement
• Keep areas well maintained
  • Repair vandalized facilities rapidly
  • Remove graffiti

AD HOC TEAM RESPONSE

The Ad Hoc Team concurs with the MSU recommendations for this category.

RATIONALE

Crime prevention is always an area where VA efforts should focus.

AD HOC TEAM RECOMMENDATIONS FOR ACTION

a. The policy memo from Chief, Operations, Civil Works Directorate, should emphasize the following regarding MSU recommendations:

   i. Emphasize that the authority for the recommended crime prevention activities exist in the current ER/EP, and again emphasize the Appendix G, list of Management Alternatives
   ii. Emphasize the benefits of the Corps Watch program and require universal implementation

b. NRM Gateway additions and improvements include improved Corps Watch page, with success stories and benefits of the program highlighted

TIMEFRAME TO IMPLEMENTATION

Recommend HQ policy memo be released within 120 days. Recommend Gateway updates completion within 6-12 months. Park Ranger CoP Advisory Board will champion this effort. ERDC will provide Technical Support for Gateway page.
4. MSU REPORT RECOMMENDATIONS REGARDING “COMMUNICATIONS”

Recommendations for Communications

- Improve communications equipment and capability of VA personnel to use it
  - Upgrade two-way radios and radio reception on projects
  - Seek improved cellular service on projects
- Increase VA access to law enforcement data (e.g. NLETS, ORI) to obtain criminal histories, wants and warrants
  - Consider making such access a condition of a local enforcement contract funds if lacking voluntary cooperation

AD HOC TEAM RESPONSE

The Ad Hoc Team only partially concurs with the MSU recommendations. The item with which we do not concur and why:

*Increase VA access to law enforcement data (e.g. NLETS, ORI) to obtain criminal histories, wants and warrants. Also consider making such access a condition of a local enforcement contract funds if lacking voluntary cooperation*

The “wants and warrants” portion of this recommendation is not appropriate for our level of authority. The recommendation to make increased access to law enforcement data a condition of law enforcement agreements is not appropriate and reflects a lack of understanding of our agency policy.

RATIONALE

The need for improved communications emerges as one of the most critical elements in the survey results. This is an area where perhaps the most important improvement can be made to directly enhance Park Ranger safety.

AD HOC TEAM RECOMMENDATIONS FOR ACTION

a. Follow up on the status of the White Paper that resulted from the SPD Visitor Assistance review and clarify the steps to be taken for improved communications resources provided by ACE-IT.
b. Establish a NRM Gateway page on “NRM Communications” that includes information from the White Paper processes that were established, and success stories on communications issues to include NLETS and ORI. The SME for that page can assist in following up with submitters of success stories to help monitor how systems are working.
TIMEFRAME TO IMPLEMENTATION

Recommend completion of both of the above within 12 months. CECW-ON (Steve Austin) and Lead, VA Cadre will champion this effort. ERDC will provide Technical Support for Gateway page.

5. MSU REPORT RECOMMENDATIONS REGARDING “VA TRAINING”

Recommendations for VA Training

- Increased emphasis on VA personnel training with focus on employee safety as recommended by respondents
  - Self-defense training less than firearms
  - Drug identification, manufacture and distribution
  - De-escalation of violence/verbal judo
  - Gangs
- Use actual project incidents involving VA personnel in training, with a focus on:
  - Situational awareness
  - Appropriate response including coordination with local law enforcement
  - Success stories

AD HOC TEAM RESPONSE

The Ad Hoc Team concurs with the MSU recommendations.

RATIONALE

Training is one of the significantly improved areas that resulted from the 1995 survey response. Improvements to training are always desirable. The ER/EP currently authorizes training as recommended by MSU. However, the team feels that the survey results indicate that accountability for providing it to all VA personnel is lacking.

AD HOC TEAM RECOMMENDATIONS FOR ACTION

a. The policy memo from Chief, Operations, Civil Works Directorate, should emphasize the following regarding MSU recommendations:

   i. The ER/EP currently contains the authority for the recommended training.
   ii. The EP in para. 6-4.d. currently requires accountability for providing appropriate and timely training for all VA personnel.

b. Create a 10-minute length video of Chief, Operations, Civil Works Directorate, giving overview of survey results and emphasis on training requirements and accountability.
c. Regarding the accountability issue, the Ad Hoc Team recommends creation of a centralized database of Park Rangers for which training accountability is but one benefit. Although the MSU report did not make a formal recommendation about this in the report, it did mention the difficulties our agency experienced in identifying all those working in VA when determining the survey population. The Staffing Analysis PDT separately has noted the difficulties in identifying NRM personnel who charge to recreation. The centralized database would eliminate the multiple lists of VA staff that never match. It is further recommended that the ERDC Recreation Team take the lead on evaluating development options. Once the centralized database is established, it is recommended that Mike Ensch issue a separate memorandum requiring its use. The database would include the following fields and functionality:

i. Name, position title, and location per Integrated Manning Document (IMD) sources
ii. Citation authority status
iii. Uniform program status
iv. Required VA training status
v. Email address, used to update Park Ranger CoP mailing lists
vi. Data fields could be updated at any time, but with an annual update required, most likely by the District VA Points of Contract.
vii. The position data could be rolled up to feed staffing information to other databases which need it, such as RecSTATUS Self Assessment, OMBIL (the NRM FTE section), etc.

d. Market and continue to develop exportable training sources, the PROSPECT VA Instructors Cadre will be champion for this effort.

e. Establish a VA Peer Review program to better insure overall VA Program consistency and accountability. Use the Park Ranger CoP Advisory Board in collaboration with VA Cadre to develop the program and recommend the process.

TIMEFRAME TO IMPLEMENTATION

Recommend HQ policy memo be released within 120 days. The video to emphasize survey results and implications should be ready within 12 months and posted on the Gateway. Peer Review process implementation recommended 12 months. The remaining items recommended for completion within 6-18 months. Park Ranger CoP Advisory Board, ERDC, CECW-ON (Steve Austin) and Lead, VA Cadre will collaborate and champion this effort.

6. MSU REPORT RECOMMENDATIONS REGARDING “RANGER HIRING”

Recommendations on Ranger Hiring

- Hire VA personnel that are physically and psychologically fit for duty to enforce appropriate federal regulations and cooperate with local law enforcement
Encourage continued physical fitness/health throughout an employee’s career in the VA program

- Hire VA personnel that have a broad-based bachelor’s degree or higher in natural resources, preferably with significant emphasis on outdoor recreation management

AD HOC TEAM RESPONSE

The Ad Hoc Team concurs with the MSU recommendations.

RATIONALE

Hiring the right persons for VA duties is always a priority. The recommendations for psychological and physical fitness also emerged from the SPD VA Program Study.

AD HOC TEAM RECOMMENDATIONS FOR ACTION

a. NRM Career Development Steering Committee (NRMCDSC) and the Park Ranger CoP Advisory Board further investigate issues around physical and psychological fitness as hiring criteria and as condition of continued employment. Provide Chief, Operations, Civil Works Directorate, recommendations as to adoption and implementation.

b. NRMCDSC should continue to produce enhanced recruiting methods/tools to ensure that all new hires have the proper credentials to adequately perform park ranger functions.

TIMEFRAME TO IMPLEMENTATION

Recommend implementation of recommendations from the NRMCDSC and Park Ranger CoP Advisory regarding physical and psychological fitness within 3 years. NRMCDSC recruiting efforts are ongoing. Park Ranger CoP Advisory Board and NRM Career Development Steering Committee will champion this effort.

7. MSU REPORT RECOMMENDATIONS REGARDING “RANGER ROLES AND UNIFORM”

Recommendations on Ranger Roles and Uniform

- Interpretive messages at every project should clearly spell out to visitors the role of Corps park rangers
- The uniform needs to reflect the roles of VA personnel, not just enforcement of federal regulations
  - The Corps should work across the VA community to define and design a uniform that reflects the VA role and authority
  - The appropriate code of federal regulations and partnering with local law enforcement should be enforced
• If a law enforcement contract is in place, local unit contract enforcement should be emphasized through interpretive and other communication

AD HOC TEAM RESPONSE

The Ad Hoc Team concurs with the MSU recommendations with the exception of the following:

a. Additional clarification from Dr. Nelson will be required to fully comprehend what is meant by “The enforcement of the appropriate code of federal regulations and partnering with local law enforcement”.

b. No wholesale uniform design change proposals or actions are recommended at this time.

RATIONALE

The Ad Hoc Team's review of this report concludes that these two important issues are clear:

a. The role of the Corps Park Ranger will remain intact with no changes

b. There is no consensus for change to the uniform. The Ad Hoc Team believes that the current uniform does properly reflect the Park Ranger role. It is the federal NRM uniform typical of other federal land management agencies. Some other agencies are getting into more risky roles with this uniform (for instance NPS in drug enforcement), and public perception over time may require another look at this issue in the future.

AD HOC TEAM RECOMMENDATIONS FOR ACTION

a. Continue routine interpretive efforts regarding role of the Park Ranger, and continue to share the role of the ranger in routine public contacts. Create an interpretive program on role of the ranger for and/or share on the Interpretive Services and Outreach (ISOP) Gateway page any established programs suitable for inclusion on in the ISOP Toolbox.

b. Continue annual uniform reviews by the Uniform Committee, and continue to make minor uniform changes so that items such as polo shirt and ball caps are available for duties appropriate to more casual version of the uniform.

TIMEFRAME TO IMPLEMENTATION

ISOP Toolbox additions are recommended within 12 months. Interpretive efforts are ongoing. Uniform reviews and minor changes ongoing. Program Manager, Interpretive Services and Outreach and Chair, Uniform Committee will champion this effort.