



US DEPARTMENT OF VETERANS AFFAIRS **OFFICE OF INSPECTOR GENERAL**

Office of Audits and Evaluations

DEPARTMENT OF VETERANS AFFAIRS

Audit of VA's Police Staffing Decision Tool

Audit

25-00523-82

June 10, 2026

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Executive Summary

The VA Office of Inspector General (OIG) conducted this audit to evaluate VA's use and governance of the tool to support police staffing needs at medical facilities. The OIG team reviewed policies, documentation, and correspondence related to the planning and development of the police staffing decision tool and interviewed VA and Veterans Health Administration (VHA) staff and medical facility police chiefs about the status of the tool from January through March 2025. VA police officers play a critical role in providing security and law enforcement services for VHA medical facilities. In 2018, the OIG reported that VA did not have a facility-specific staffing model to determine the appropriate number and type of police officers for each medical facility.¹

In this audit, the OIG found that VA initiated the process to develop the staffing tool but could not provide evidence that the tool was validated or had been distributed for use at all medical facilities. The police staffing tool is intended to be used to determine facility-specific police staffing levels. In April 2025, during this audit, the Secretary of Veterans Affairs directed the reorganization and consolidation of all VA police officers into a single command structure and, in September 2025, established the Office of Operations, Security, and Preparedness (OSP) as a stand-alone organization with its own assistant secretary.

The OIG made four recommendations to address improvements of VA's process to validate and disseminate a finalized police staffing decision tool or similar model. VA personnel from the Manpower Management Service (MMS) and OSP's Office of Security and Law Enforcement (OSLE) started working again in August 2025 to update the staffing tool. In a November 2025 meeting, OSP senior leaders told the OIG team that a police staffing tool was needed to aid the VA police modernization effort, and recommendations would be helpful in achieving those objectives. In late April 2026, VA responded to the report and concurred with all four recommendations. VA reported establishing an integrated project team with defined roles and responsibilities that will develop an updated police manpower model. Additionally, VA said it will take steps to ensure established procedures are followed to complete and validate the new tool as well as ensure the tool is disseminated to the field and used by VA police. The assistant secretaries noted that the report highlights an opportunity to strengthen processes to validate and disseminate staffing tools that will help their larger VA police realignment effort.

¹ VA OIG, [Inadequate Governance of the VA Police Program at Medical Facilities](#), Report No. 17-01007-01, December 13, 2018 (updated June 10, 2019). See appendix A for more information about this report and related reports.

What the Audit Found

In July 2019, two VA offices—MMS and OSLE—signed a formal agreement establishing responsibility for a manpower analysis of police and security staffing requirements, resulting in a staffing model.² The offices began collecting information from police at medical facilities for the staffing model in August 2019. In May 2022, VA Directive 0731 required facility directors to document facility staffing standards in the police staffing decision tool. However, from January through March 2025, the OIG team interviewed 25 police chiefs, and 24 (96 percent) said they had not received a final version of the tool or did not know whether their version was ready for use.

VA officials are responsible for establishing a control environment (including structure, responsibility, and authority), creating control activities, and monitoring program operations.³ Despite these requirements, VA did not clearly designate responsibility for all relevant stakeholders or monitor progress of the tool.

Further, the then-combined Office of Human Resources and Administration/Operations, Security, and Preparedness did not ensure that MMS addressed staffing model vulnerabilities, such as the risk of inflating staffing needs or inaccurately combining facility data. MMS also could not provide the OIG team with documentation that it had followed its own standard operating procedures to validate the tool or write the close-out memorandum.

Next Steps

The OIG found the action plans were responsive to the intent of the OIG recommendations. The OIG will monitor VA's progress and will close the recommendations once VA provides sufficient evidence that corrective actions have been adequately implemented.



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² Several versions of the tool were provided to the OIG team during the audit. The team did not analyze or compare the use or functionality of the versions. For full details of the audit's scope and methodology, see appendix B.

³ Office of Management and Budget, Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, July 15, 2016; Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

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Abbreviations

GAO	Government Accountability Office
HRA	Office of Human Resources and Administration
HRA/OSP	Human Resources and Administration/Operations, Security, and Preparedness
MMS	Manpower Management Service
OIG	Office of Inspector General
OSLE	Office of Security and Law Enforcement
OSP	Office of Operations, Security, and Preparedness
OSSO	Office of Senior Security Officer
VHA	Veterans Health Administration



Introduction

VA police officers play a critical role in providing security and law enforcement services for the medical facilities in the Veterans Health Administration (VHA). Under 38 U.S.C. §§ 901 and 902, VA police are authorized to enforce federal laws and rules prescribed to maintain law and order and protect persons and property at medical facilities. They also investigate criminal activity committed within VA's jurisdiction and make arrests on VA property. VA policies state that police officers patrol, maintain a presence at facilities, respond to active threats or disturbances, and monitor security cameras. VA Directive 0730 establishes that each VA facility will have a sufficient VA police workforce to provide protection throughout the facility.⁴

In December 2018, the VA Office of Inspector General (OIG) reported that VA did not have a facility-specific staffing model to determine the appropriate number and type of police officers for each medical facility.⁵ In response, VA took action to strengthen governance over police staffing. This included developing a workload-based staffing model—called the police staffing decision tool—and issuing VA Directive 0731 in May 2022 requiring medical facilities to use the staffing tool.⁶ The OIG conducted this audit to evaluate VA's use and governance of this tool to support police staffing needs at medical facilities.

For the initial portion of this audit, governance of the police program was shared by VHA and what was VA's Office of Human Resources and Administration/Operations, Security, and Preparedness (HRA/OSP). In April 2025, the VA Secretary directed the reorganization and consolidation of all VA police officers into a single command structure, and in September 2025, established the Office of Operations, Security, and Preparedness (OSP) as a stand-alone organization with its own assistant secretary. In November 2025, OSP leaders told the OIG team that a police staffing tool was needed to aid the VA police modernization effort and that the OIG's recommendations will be helpful in achieving their objectives. The findings of this report are important to ensure VA follows through to establish and use a tool to help determine appropriate staffing levels for the police workforce.

VA Police Staffing Policy

VA Directive 0731, released in May 2022, establishes policy for determining police staffing standards at VA owned or leased spaces. Staffing standards are based on consideration of required factors that determine the appropriate number of police staff needed at each facility.

⁴ VA Directive 0730, *Security and Law Enforcement*, December 12, 2012.

⁵ VA OIG, [Inadequate Governance of the VA Police Program at Medical Facilities](#), Report No. 17-01007-01, December 13, 2018 (updated June 10, 2019). See appendix A for more information about this report and other related publications.

⁶ VA Directive 0731, *Police Staffing Policy*, May 6, 2022. This report refers to the model as a "tool" after the policy named it and as a "model" when discussing events that occurred before the policy was released.

Facility police chiefs enter site-specific data into a model—formally named the police staffing decision tool—to help determine the number of police officers needed for their location. Core requirements for police operations across VA include 24-hour-per-day coverage for law enforcement operations and the emergency department's stationary post and having at least the minimum number of required uniformed officers on patrol at all times, as determined by the staffing tool.

The policy assigned the assistant secretary for HRA/OSP responsibility for managing the staffing tool. Medical facility directors were required to implement the new police staffing policy and to start using the staffing tool no later than May 2023. They were also required to ensure that staffing information was accurate, to report to VA officials on facility efforts, and to provide resources needed to implement staffing standards. Following the reorganization and consolidation of the VA police governance structure, these responsibilities will be a collaborative effort between HRA and OSP. According to the director of police services in OSP, the tool is being revalidated and use of the tool will fall within the purview of the assistant secretary of OSP to determine appropriate staffing levels for each police unit.

Offices Involved in Planning and Developing the Police Staffing Decision Tool

The OIG team identified two VA offices and two VHA offices that were involved in planning and developing versions of a police staffing tool starting in 2019.⁷ However, these offices were not given responsibilities for the tool itself in VA Directive 0731. General responsibilities of each office are listed below.

VA's Manpower Management Service (MMS) oversees the Manpower Management Program for VA's administrations and staff offices. This service has three focus areas: policy and processes, manpower management, and organizational design. VA Directive 5010 defines manpower management as "a requirements-based process for ensuring the VA has the right staffing levels and organizational structure to promote the most efficient and economical use of resources to meet the mission."⁸ VA Directive 5010 requires MMS to verify, validate, and approve staffing models.

VA's Office of Security and Law Enforcement (OSLE) institutes procedures, standards, and policies for VA's law enforcement and security operations to protect veterans, staff, and visitors. Additionally, the office oversees police operations through audits, inspections, and data analysis.

VHA's Workforce Management and Consulting office works to ensure the administration acquires and retains talented personnel and issues policy and guidance for human resources

⁷ Several versions of the tool were provided to the OIG team during the audit. The team did not analyze or compare the use or functionality of the versions. For full details of the audit's scope and methodology, see appendix B.

⁸ VA Directive 5010, *Manpower Management Policy*, October 28, 2019.

operations. The office supports VHA's human resources function by focusing on implementation of relevant legislation, manpower management, and workforce planning.

VHA established the Office of the Senior Security Officer (OSSO) in 2021 to improve governance of the police force. This office works to ensure compliance with and implementation of VA policies and regulations. The office also develops standardized position descriptions for police staff and creates internal standard operating procedures to guide Veterans Integrated Service Network security officers in their oversight responsibilities.

As stated previously, in April 2025, the Secretary of Veterans Affairs directed the reorganization and consolidation of all VA police officers into a single command structure, and in September 2025, established OSP as a stand-alone organization with its own assistant secretary. This realigned the mission, functions, and personnel from VHA to the new assistant secretary, including OSSO, regional security officers, and facility police chiefs and officers. In November 2025, the principal deputy assistant secretary for OSP told the audit team that all but the staff-level police officers and other support personnel had transitioned to OSP. The overall transition is planned to be completed by November 2026.

Results and Recommendations

Finding: VA Did Not Broadly Distribute the Police Staffing Decision Tool Due to Inadequate Governance and Communication

In response to an OIG recommendation, in July 2019, two VA offices agreed to begin analyzing police and security staffing requirements to produce a police staffing model. VA established Directive 0731, which named the model the “police staffing decision tool” in May 2022 and required that it be used department-wide by May 2023. This tool was intended to help determine the number of police officers needed for each medical facility. However, multiple sources corroborated that VA did not widely distribute the tool, and it was therefore not available for facilities to use.

Although key VA offices agreed to work together on a police staffing model, responsible VA officials did not effectively implement internal controls over the project. VA did not clearly designate roles and responsibilities for all relevant stakeholders or monitor whether key tasks were completed. Additionally, VA did not ensure manpower management staff addressed vulnerabilities with the tool or followed their own procedures to finalize it. Without a staffing tool or other model, VA leaders lack a consistent mechanism to determine facility-specific police staffing levels.

What the OIG Did

The audit team reviewed VA guidance on police staffing and manpower management requirements and interviewed staff and leaders involved in planning and developing versions of the police staffing tool. To assess medical facilities’ knowledge and use of the tool, the team interviewed police chiefs from a statistical sample of 25 medical facilities—22 facilities were randomly selected, and three facilities were judgmentally selected. These interviews were conducted from January through March 2025.⁹ The team also received several versions of the tool and reviewed the most recent one to understand the tool’s vulnerabilities as identified by stakeholders. Furthermore, the team reviewed the agreement between key VA offices establishing responsibilities for delivering a staffing model and reviewed communication among VA and VHA entities about the development of the tool.

The team met with VA leaders from MMS and OSLE involved in the tool’s development in October 2025 to discuss the preliminary results of the audit.

⁹ In this report, “police chief” refers to the chief, acting chief, or deputy chief. If a medical facility police chief role was vacant or the chief was not available to participate, the team interviewed the deputy police chief. For more details about the statistical methodology, see appendix C.

VA's Development of the Police Staffing Decision Tool

To address the concerns raised in the 2018 OIG report, VA initiated the process to develop the staffing tool in July 2019. Data collection and testing began in August 2019 and produced versions of the tool; the most recent version was dated March 15, 2021. The OIG team found that MMS, OSLE, and OSSO staff met or exchanged messages about the tool until at least September 2023, yet VA leaders could not provide evidence that further action was taken or other versions were developed. The manpower team lead said factors that led to the tool remaining unfinished included competing priorities, multiple ownership changes, communication issues, and a lack of dedicated engagement. Further, while the tool was required beginning in May 2023, most facility police chiefs interviewed by the OIG team had not received the most recent copy of it.

Planning Steps and Initial Versions of the Police Staffing Decision Tool

On July 3, 2019, the MMS director and OSLE senior executive director signed a formal agreement, called the Terms of Reference, to provide a police staffing model focused on field-based requirements. The purpose of the agreement was “to establish the responsibilities, scope, and approach for a manpower and organizational analysis of [VA] law enforcement (police) and security staffing requirements.” VA’s manpower management and police and security offices collected information from police services at medical facilities in August 2019, December 2019, and January 2020. The data collected helped ensure the developers considered relevant workload information, such as the number of patrols, controlled access points, and occupied buildings on the property monitored by VA police. Outputs of the model compared the current police staffing at medical facilities to proposed new staffing needs based on the workload data collected.

In February 2020, manpower management staff summarized progress on the staffing model’s development in a presentation for the principal deputy assistant secretary for HRA/OSP. Preliminary findings showed that VA needed 1,984 police staff above what was already authorized, representing a 45 percent increase.¹⁰ In May 2020, meeting notes from the VHA police services project indicated that a “solid prototype” of the tool was completed and tested.

Leaders from MMS, OSLE, and OSSO shared that the most recent version of the tool they had was dated March 15, 2021. The technical report draft that supported this version recommended that VHA and OSLE update the model and reassess police staffing. In May 2022, HRA/OSP published VA Directive 0731, which named the model the police staffing decision tool and required use of the tool no later than May 2023. In June 2022, a network security officer inquired

¹⁰ Police staff identified in the presentation held positions in the 0083 series. According to VA Directive 0731, the 0083 series can include police officers, supervisory police officers, police detectives, or training officers.

about the tool via email and received a response that the directive was released without the staffing tool and that it would be shared when completed.

Responsible VA officials could not provide the OIG team with evidence that the tool was validated or had been distributed for use at all medical facilities. VA and VHA offices involved in the tool's development did not agree about the tool's status during interviews with the audit team:

- MMS and Workforce Management and Consulting—the VA and VHA offices, respectively, that ensure appropriate staffing levels—asserted that the tool was completed or validated.
- OSLE and OSSO—the VA and VHA police and security offices, respectively—said the tool was not finalized.

Most medical facility police chiefs interviewed by the OIG team said they had not received a product that was ready to use, and those who had the tool had a copy that predated the 2021 version.

VA Facility Police Chiefs' Responses About the Police Staffing Decision Tool

Although VA Directive 0731 required medical facilities to begin using the police staffing decision tool no later than May 2023, VA medical facility police chiefs confirmed to the OIG team that a final version of the tool was not distributed to the field. The team asked police chiefs from 25 sampled medical facilities whether they had access to the tool and, if so, whether they were told that version was finalized or ready to use.¹¹ Twenty-four of the 25 chiefs (96 percent) said they had not received a final version or did not know whether their version was ready to use. Sixteen chiefs (64 percent) reported they did not have a version of the tool at all, and several asked the audit team for a copy.

One chief said he was informed that the version he received was final. However, the team determined that the chief's documents predated the March 2021 tool identified by MMS, OSLE, and OSSO as the most recent version.

¹¹ The sample was derived from 128 parent facilities that provided police workload data for a 2021 draft version of the police staffing decision tool. For more information about the statistical sampling methodology, see appendix C. Although VA policy designates facility directors as responsible for using the tool to document police staffing, the audit team identified police chiefs as the primary stakeholder because they enter the facility-specific data.

VA's Internal Controls Over the Police Staffing Decision Tool

VA did not distribute the police staffing decision tool to all medical facilities because responsible VA officials did not effectively implement internal controls to ensure it was ready for use.¹² The Office of Management and Budget and the Government Accountability Office (GAO) require that managers establish and maintain internal controls necessary for effective and efficient program operations.¹³ According to GAO's *Standards for Internal Control in the Federal Government*, managers are responsible for establishing a control environment (including structure, responsibility, and authority), creating control activities, and monitoring program operations. Despite these standards, VA did not clearly designate roles and responsibilities for all relevant stakeholders or monitor progress of the tool. HRA/OSP also did not ensure that MMS addressed staffing model vulnerabilities or followed procedures to finalize the tool.

VA Stakeholder Responsibilities and Monitoring of the Tool

The OIG team determined that the July 2019 Terms of Reference agreement and VA Directive 0731 did not identify formal responsibilities for two prime VHA stakeholders—Workforce Management and Consulting and its police and security office (OSSO)—despite their involvement in planning and developing the tool. The lack of designated roles created confusion and inhibited progress.

In April 2020, VA's manpower management staff discussed transitioning the tool to VHA stakeholders. The former manpower management director said in an email at that time that “[MMS's] engagement is over until the VHA has had time to work with the model and OSP [HRA/OSP] develops appropriate policies and oversight to guide the program.” A previous manpower management lead for the police staffing tool stated in a June 2020 email that OSSO and Workforce Management and Consulting “agreed to take on more of these responsibilities to update the police staffing tool.” However, the audit team did not identify where those roles were formally defined.

In March 2021, a Workforce Management and Consulting leader closed out their work on the police services project via a memorandum. Specifically, the memo said the workforce management office would not pursue creating and implementing an organizational structure and staffing tool because there was no guidance on the way ahead for VHA. When interviewed by the audit team in May 2025, the Workforce Management and Consulting project manager said the office completed all the project work it could, and decisions about the tool “were nowhere close to moving anywhere.” Despite this previous involvement, VHA leaders told the OIG team

¹² See table B.1 in appendix B for the list of identified internal control deficiencies.

¹³ Office of Management and Budget, Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*, July 15, 2016; Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

that Workforce Management and Consulting played no role in developing, validating, or implementing the tool.

Apart from VHA's Workforce Management and Consulting office stopping its work, VHA's police and security office continued to meet and discuss the tool for nearly two years. The police and security office along with the other two VA offices corresponded multiple times from October 2021 through September 2023. OSSO frequently requested updates or meetings with MMS to discuss the tool, but a manpower management lead stated that neither the police nor security offices responded to their request for feedback in July 2023.

Beyond these activities, the OIG team did not identify evidence of higher-level oversight of the tool's progress. The lack of monitoring reduced accountability and hindered progress on the tool's development and deployment. It also caused confusion within HRA/OSP as to whether the tool had been released to facilities and who was responsible for doing so. A May 2024 email identified concerns about the status of the tool and confusion about roles and responsibilities between staff in HRA/OSP. A staff member highlighted the urgency of delivering the tool, citing the 2022 policy and the missed deadline to start using the tool in May 2023—noting, "We need to get together to get the tool to the field. We are vulnerable since it's in policy."

Recommendation 1 addresses the need for VA to identify all relevant stakeholders and formally define roles and responsibilities for the police staffing decision tool (or similar model).

Manpower Management Responsibility to Address Vulnerabilities and Finalize the Tool

Through the various exchanges following the initial development of the police staffing model, the VA and VHA police and security offices (OSLE and OSSO, respectively) expressed concerns about vulnerabilities with the tool. MMS used Microsoft Excel to build the police staffing tool, which required medical facility police chiefs to manually enter data. An OSSO official pointed out in October 2021 that the staffing numbers could be manipulated and, consequently, the tool could be misused. In an email to an MMS leader, the official stated, "I'd like to prevent the opportunity to manipulate/misuse the tool" and later explained to the audit team that facilities could inflate the workload data and thus increase the estimated staffing needs. For example, changing the number of patrol hours could result in higher proposed police manpower. He suggested implementing a data control to require justification and approval of facility workload data entries.

The OSSO official also noted that the tool inaccurately rolled up staffing data by combining subsidiary facilities under the parent location. According to OSLE, this issue resulted in the tool inaccurately showing large staffing gaps primarily in subsidiary facilities organized under the parent facility. The audit team confirmed that the staffing data for the subsidiary facilities were not properly aligned in the March 2021 version of the tool, causing the parent facility to appear overstaffed and the affiliated facilities understaffed. For example, for the VA Puget Sound

Health Care System in Washington, the tool incorrectly showed overstaffing at the parent facility in Seattle and no police staff at a subsidiary facility of the healthcare system. MMS's May 2020 draft presentation of the police staffing model also acknowledged that data were incorrectly reported in VA's human resources information system and noted that facilities should work with VHA to update the staffing model.

Although the police and security offices told MMS about vulnerability concerns starting as early as October 2021, manpower management staff explained that the staffing tool had not been updated since 2021. A former OSSO leader told the OIG team that because these vulnerabilities were never addressed, they did not have a viable product that could be distributed to the medical facilities.

Recommendation 2 addresses the need for MMS and OSLE to coordinate with relevant stakeholders to address tool vulnerabilities.

As previously noted, VA Directive 5010 requires MMS to verify, validate, and approve staffing models. To help achieve this requirement, this service developed a standard operating procedure to evaluate staffing models or similar products.¹⁴ While manpower management staff followed their own procedures by signing an agreement, collecting data, and producing an initial staffing model, they did not document and finalize the tool as required.

According to the standard operating procedure, staff should check the accuracy and validity of the data used. After the staffing model has been validated, a close-out memorandum should be written to indicate that project validation is complete, and then staffing requirements are documented in VA's human resources information system. The acting MMS director as of February 2025 told the audit team that the previous director considered the March 2021 version of the tool as having been validated. However, the service could not provide the OIG team with documentation that the tool had been validated, that a briefing of the final results occurred, or that the close-out memorandum was written.

The OIG team noted that turnover of manpower management staff may have contributed to the challenge of following procedures to finalize the tool. From 2019 through 2022, the tool transitioned between four project leaders. One of VHA's employees on the project confirmed the personnel changes and stated that the project eventually fell into a black hole.

Without a tool to aid VA in determining facility-specific police staffing levels, VA has limited ability to make consistent, up-to-date staffing decisions for police across its medical facilities. In interviews with the audit team, 18 of 25 medical facility police chiefs (72 percent) believed that the number of police staff onboard at the time was insufficient. One chief shared that the use of a police staffing tool could help justify requests for police staff.

¹⁴ VA Manpower Management Services Model Validation Process Standard Operating Procedures, June 1, 2021 (version 1.3).

Recommendation 3 addresses the need for MMS to follow its procedures for documenting the completion of the police staffing tool. Recommendation 4 addresses the need to assign accountability for disseminating the tool or a similar model after it is finalized and ensuring that it is used.

VA Leaders Have Initiated Action to Update the Tool

Since the OIG began this audit work, MMS and OSP leaders began meeting about the tool again. In August 2025, a VA police and security director emailed the manpower management team lead requesting an updated tool and said, “With the consolidation efforts we will absolutely need the VA Police staffing tool up and running.” The manpower lead responded, suggesting they meet to discuss updates and refresh the tool. As of December 2025, a new draft agreement had been created. The draft agreement establishes that MMS will deliver an updated police and security staffing model, but a completion date has not been confirmed.

Conclusion

VA took action to strengthen governance over police staffing by developing versions of the police staffing decision tool and establishing policy requiring facilities to use it. The tool is meant to help VA find the right number of officers needed for each location. However, facilities have been unable to meet policy requirements because VA officials did not distribute the police staffing decision tool to all medical facilities.

Since a police staffing tool has not been distributed, VA leaders do not have a consistent mechanism to determine facility-appropriate police staffing. Leaders from MMS and OSLE should disseminate a final version of the police staffing decision tool or a similar model to meet policy requirements. Once the tool or a similar model is finalized, MMS should document its completion by following its standard operating procedures.

Recommendations 1–4

The OIG made the following recommendations to the VA assistant secretaries for HRA and OSP to ensure VA's MMS and OSLE:¹⁵

1. Identify all relevant stakeholders and formally define roles and responsibilities for the police staffing decision tool or similar model.
2. Coordinate with all relevant stakeholders to address vulnerabilities with the police staffing decision tool or a similar model.

The OIG made the following recommendation to the VA assistant secretary for HRA:

¹⁵ The recommendations addressed to the assistant secretaries for HRA and OSP are directed to anyone in an acting status or performing the delegable duties of the position.

3. Ensure the Manpower Management Service's standard operating procedures are followed to document formal completion of the police staffing decision tool or a similar model.

The OIG made the following recommendation for the VA assistant secretary for OSP:

4. Assign accountability for disseminating the finalized police staffing decision tool or a similar model and ensuring its use.

VA Management Comments

The assistant secretaries for HRA and OSP concurred with the OIG findings and provided corrective action plans in late April 2026.¹⁶ The statements noted, "This report highlights an opportunity for us to strengthen processes to validate and disseminate staffing tools that will ultimately aid the larger VA police realignment effort." The full text of the management comments is provided in appendixes D and E. In response to recommendations 1 and 2, VA established an integrated project team with relevant stakeholders and will draft a charter to document roles and responsibilities for developing an updated VA police manpower model. VA states that the updated model will address vulnerabilities once it is completed and validated.

To address recommendation 3, VA will ensure that MMS follows established procedures to document the formal completion and validation of the manpower tool. Regarding recommendation 4, OSP will assign responsibility for disseminating the finalized tool or a similar model through regional and district police chiefs using the new consolidated organizational structure. OSP will ensure use of the tool through routine and spot inspections across the VA police. Lastly, MMS and OSLE will jointly ensure that accurate data are entered into the tool.

OIG Response

VA's corrective actions plans are responsive to the intent of the recommendations. The OIG will monitor VA's progress in addressing the recommendations and will close them when VA provides sufficient evidence that the action plans have been completed.

¹⁶ The principal deputy assistant secretary for OSP responded to the OIG's report for the assistant secretary for OSP. See appendix D.

Appendix A: Prior Publications on Police Staffing

Since 2018, the VA Office of Inspector General (OIG) and the Government Accountability Office (GAO) have published numerous reports about VA police oversight, staffing, and risks.

VA Facility Security: Policy Review and Improved Oversight Strategy Needed (January 11, 2018)

Because of security-related incidents, such as violence and threats, at Veterans Health Administration (VHA) facilities, GAO was asked to review VA's physical security risk-management policies and practices.¹⁷ GAO reported that in the absence of a comprehensive VA-wide strategy or guidance that reflects internal control standards, VHA facilities have established their own approaches to carrying out VA's risk-management policy. The lack of a system-wide oversight strategy means that the differences among medical center approaches, along with the security effects of those different approaches, are unknown. Accordingly, VA does not have assurance that its medical centers are adequately protected and may be missing opportunities to leverage resources nationally and make better informed, proactive policy decisions. One of the report's recommendations was related to VA police and remains open (table A.1).

Table A.1. Status of the Relevant Recommendation from the 2018 GAO Report

Recommendation	Status
2. The Secretary of VA should develop an oversight strategy that allows VA to assess the effectiveness of risk-management programs at VHA facilities system-wide.	Open

Source: GAO website (<https://www.gao.gov/>) as of January 12, 2026.

Inadequate Governance of the VA Police Program at Medical Facilities (December 13, 2018)

The OIG reported that VA did not have adequate and coordinated governance over its police program to ensure effective management and oversight for its approximately 4,000 police officers.¹⁸ The governance problems stemmed from confusion about police program roles and authority as well as the lack of a coordinated or centralized governance structure. According to VA policy, VHA leaders maintained primary responsibility for ensuring police program requirements were achieved. However, the Office of Security and Law Enforcement (OSLE), a

¹⁷ GAO, *VA Facility Security: Policy Review and Improved Oversight Strategy Needed*, GAO-18-201, January 11, 2018.

¹⁸ VA OIG, *Inadequate Governance of the VA Police Program at Medical Facilities*, Report No. 17-01007-01, December 13, 2018 (updated June 10, 2019).

VA staff office that falls outside VHA, had limited program oversight responsibilities such as developing and issuing national policies and inspecting police operations at VHA facilities. OSLE did not have program authority to manage VA police operations at medical facilities. The OIG also found that VA lacked police officer staffing models that could be tailored to the needs of similar types of medical facilities to determine the appropriate number and type of police officers. Additionally, the OIG found that many VA facilities were below their authorized levels of police officers, attributed to competing priorities in hiring healthcare staff and higher salaries being offered by other law enforcement agencies. Three of the five recommendations made by the OIG were related to police staffing (table A.2). All three recommendations have been closed.

Table A.2. Status of Relevant Recommendations from the 2018 VA OIG Report

Recommendation	Status
2. The VA Deputy Secretary ensures police staffing models are implemented for determining facility-appropriate levels for officers at medical facilities.	Closed, implemented August 16, 2022
3. The VA Deputy Secretary makes certain medical facilities use strategies to address police staffing challenges, such as having documented recruitment plans for police officer positions that include a determination of the need for special salary rates and incentives.	Closed, implemented August 10, 2021
4. The VA Deputy Secretary assesses the staffing levels for the OSLE police inspection program, and authorizes and provides sufficient resources to conduct timely inspections of police units at medical facilities to help identify program compliance issues.	Closed, implemented July 11, 2024

Source: VA OIG reports web page (<https://www.vaog.gov/reports/all>).

Review of Veterans Health Administration Staffing Models (August 19, 2021)

The OIG reviewed VHA staffing models, implementation of staffing models, and staffing levels and requirements.¹⁹ The OIG found that occupational models used to determine staffing requirements were in development, but as of October 2020, only one caregiver staffing model had been validated as required by VA Directive 5010.²⁰ During this review, the VA manpower director also informed the OIG that a staffing model for police was developed and had been provided to VHA for review and vetting. The absence of validated and implemented staffing models across VHA resulted in inconsistent approaches in how staffing requirements were determined. Although staffing models were available for facility use, these models did not determine staffing requirements. Two of the three recommendations in this OIG report were related to staffing models (table A.3). One of the recommendations remains open.

¹⁹ VA OIG, [Review of Veterans Health Administration Staffing Models](#), Report No. 20-01508-214, August 19, 2021.

²⁰ VA Directive 5010, *Manpower Management Policy*, October 28, 2019.

Table A.3. Status of Relevant Recommendations from the 2021 VA OIG Report

Recommendation	Status
1. The under secretary for health coordinates with VA to review the roles, responsibilities, and number of staff required for the VA and VHA offices involved in the development, validation, and implementation of staffing models, and ensure that staffing model-related efforts are prioritized and supported.	Open
2. The under secretary for health coordinates with VA to evaluate the status of, and provide a timeline for, the development, validation, and implementation of VHA staffing models for all occupations.	Closed, implemented July 22, 2025

Source: VA OIG reports web page (<https://www.vaoig.gov/reports/all>) as of January 12, 2026.

Security and Incident Preparedness at VA Medical Facilities (February 22, 2023)

The OIG identified multiple security vulnerabilities and deficiencies at 70 facilities visited. Staffing challenges were a significant factor to security vulnerabilities at facilities, such as the lack of a visible and active police presence.²¹ Further, based on survey results, security personnel frequently reported staffing shortages and often noted they were operating with very few officers. Some facilities used overtime to mitigate staffing shortages, with some making overtime mandatory. About 37 percent of survey respondents expressed concerns about the physical security at their facilities, and some noted the lack of VA police on duty would sometimes make it difficult to respond to threats such as an active shooter. Four of the six recommendations in this report were related to police staffing, and all four have been closed (table A.4).

Table A.4. Status of Relevant Recommendations from the 2023 VA OIG Report

Recommendation	Status
1. The Secretary of VA delegates to a responsible official the monitoring of VA facilities' security-related vacancies and report monthly on hiring trends and whether recent recruitment and hiring authorities established since the fiscal year 2021 Police National Strategic Recruitment Plan are resulting in improvements.	Closed, implemented November 12, 2024
2. The Secretary of VA authorizes sufficient staff for the Human Resources and Administration/Operations, Security and Preparedness' OSLE to inspect the VA police forces, per the OIG's 2018 unimplemented recommendation.	Closed, implemented August 2, 2024
3. The under secretary for health ensures medical facility directors use appropriate measures to assess VA police staffing needs, authorize associated positions, and leverage available mechanisms to fill vacancies.	Closed, implemented April 3, 2024

²¹ VA OIG, [Security and Incident Preparedness at VA Medical Facilities](#), Report No. 22-03770-49, February 22, 2023.

Recommendation	Status
4. The under secretary for health verifies that medical facility directors commit sufficient resources to make certain that facility security measures are adequate, current, and operational.	Closed, implemented January 23, 2024

Source: VA OIG reports web page (<https://www.vaog.gov/reports/all>).

Federal Police Officers: Considerations on Retirement and Pay (April 2, 2025)

GAO identified key issues for agencies and Congress to consider in any proposed changes to federal police officers' retirement and pay.²² According to the report, 32 percent of federal police officers work for VA. Surveyed federal agency staff cited an increased threat environment, civil unrest, and the need for overtime to address staffing shortages as examples of changes in working conditions for federal police officers. GAO found that federal police officers generally do not receive enhanced retirement benefits. VA shared that the process for determining who meets the law enforcement statutory definition and who receives law enforcement officer retirement benefits could benefit from more streamlining procedures, enhanced transparency, and flexibility to address evolving workforce dynamics. GAO also identified a range of considerations regarding potential changes to federal police officers' retirement and pay provisions. No recommendations were made.

OIG Determination of VHA's Severe Occupational Staffing Shortages Fiscal Year 2025 (August 12, 2025)

The VA Choice and Quality Employment Act of 2017 requires the VA OIG to determine, annually, a minimum of five clinical and five nonclinical VHA occupations with the largest staffing shortages in each VHA medical center. The OIG conducted this review to identify those severe staffing shortages by occupation and compared the number of severe occupational staffing shortages against the previous seven years' reports to assess changes.²³ The OIG deployed a questionnaire to VHA facilities to identify severe occupational shortages at each facility. The OIG did not independently verify VHA responses. All 139 facilities surveyed reported staffing shortages. Police were designated as the most frequently reported shortage of all occupations. No recommendations were made.

²² GAO, *Federal Police Officers: Considerations on Retirement and Pay*, GAO-25-107099, April 2, 2025.

²³ VA OIG, *OIG Determination of Veterans Health Administration's Severe Occupational Staffing Shortages Fiscal Year 2025*, Report No. 25-01135-196, August 12, 2025. The VA OIG reports on occupational staffing shortages annually: [Report No. 18-01693-196](#), June 14, 2018; [Report No. 19-00346-241](#), September 30, 2019; [Report No. 20-01249-259](#), September 23, 2020; [Report No. 21-01357-271](#), September 28, 2021; [Report No. 22-00722-187](#), July 7, 2022; [Report No. 23-00659-186](#), August 22, 2023; [Report No. 24-00803-222](#), August 7, 2024.

Appendix B: Scope and Methodology

Scope

The VA Office of Inspector General (OIG) conducted its work from December 2024 through February 2026. The audit team reviewed the implementation and use of the police staffing decision tool at medical facilities and the oversight roles of relevant VA and Veterans Health Administration (VHA) offices.

Methodology

The team reviewed VA policy and procedures to understand police staffing at medical facilities, the police staffing decision tool, and VA manpower requirements. The team interviewed staff from multiple offices about their involvement in planning and developing the police staffing tool. Offices included Human Resources and Administration/Operations, Security, and Preparedness's Manpower Management Service and Office of Security and Law Enforcement, and VHA's Workforce Management and Consulting and Office of the Senior Security Officer. To determine the facility's knowledge and use of the police staffing decision tool, the team also interviewed police chiefs from 25 statistically selected medical facilities.²⁴ Interviews were conducted from January through March 2025.

The team reviewed documentation related to the police staffing decision tool, including the agreement between the offices responsible for developing the tool and communication between VA and VHA offices about the tool. Because VA did not disseminate the tool to all medical facilities, the team reviewed versions of the tool as developed to confirm reported vulnerabilities but did not analyze their use or functionality.

Internal Controls

The team assessed internal controls to determine whether they were significant to the audit objective. This included consideration of the five internal control components: control environment, risk assessment, control activities, information and communication, and monitoring.²⁵ In addition, the team reviewed the principles of internal controls as associated with the objective and identified four components and seven principles as significant.²⁶ The team

²⁴ For more information on the statistical sample, see appendix C.

²⁵ Government Accountability Office, *Standards for Internal Control in the Federal Government*, GAO-14-704G, September 2014.

²⁶ Because the audit was limited to the internal control components and underlying principles identified, it may not have disclosed all internal control deficiencies that could have existed at the time of this audit.

identified internal control deficiencies during this audit and proposed recommendations to address those listed in table B.1.

Table B.1. VA OIG Analysis of Internal Control Components and Principles Identified as Significant

Component	Principle	Deficiency identified by this audit
Control environment	2. Exercise oversight responsibility	VA did not establish oversight responsibility for key stakeholders.
	3. Establish structure, responsibility, and authority	VA did not establish responsibility for VHA offices involved in planning and developing the tool.
Control activities	10. Design control activities	VA did not assign clear roles and responsibilities to key stakeholders for implementation of the tool.
	11. Design activities for the information system	Police chiefs are not using the police staffing decision tool.
	12. Implement control activities	VA did not follow procedures to validate the police staffing decision tool. VA did not widely distribute a staffing model for the police service.
Information and communication	14. Communicate internally	VA officials did not effectively implement controls hindering progress and distribution of the police staffing tool.
Monitoring	16. Perform monitoring activities	VA established policy requiring use of the police staffing decision tool before finalizing and disseminating it. Once the tool is completed and distributed, VA and VHA leaders should monitor staffing information in the tool.

Source: VA OIG analysis of internal control components and principles. The principles listed are consistent with the Government Accountability Office's Standards for Internal Control in the Federal Government.

Data Reliability

The audit team did not rely on computer-processed data to support the finding, conclusion, or recommendations.

Government Standards

The OIG conducted this performance audit in accordance with generally accepted government auditing standards.²⁷ Those standards require that the OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. The OIG believes the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

²⁷ Government Accountability Office, *Government Auditing Standards 2024 Revision*, GAO 24 106786, February 2024.

Appendix C: Statistical Sampling Methodology

Approach

To accomplish the objective, the audit team identified a statistical sample of VA medical facilities and interviewed the police chiefs or deputy police chiefs to identify their knowledge and use of the police staffing decision tool.

Population

The audit population included the 128 parent medical facilities that provided data for development of the 2021 version of the police staffing decision tool.²⁸

Sampling Design

The audit team statistically selected 25 medical facilities—22 facilities were randomly selected, and three facilities were judgmentally selected. If the police chief was not available to participate, the team interviewed that site's deputy police chief or acting police chief. Accordingly, the team interviewed 22 police chiefs and three deputy police chiefs. The team asked the police officials from these 25 facilities about their familiarity with the tool, the extent to which they have used the tool, and the adequacy of their staffing levels.

²⁸ A parent facility is a healthcare service location that is under one administrative leadership team, which can include multiple VA medical centers or healthcare system divisions, campuses, or community-based outpatient clinics.

Appendix D: VA Management Comments, Office of Operations, Security, and Preparedness

Department of Veterans Affairs Memorandum

Date: March 16, 2026

From: Assistant Secretary for Office of Operation, Security, and Preparedness (007)

Subj: Office of Inspector General Draft Report, Audit of Department of Veterans Affairs' Police Staffing Decision Tool (Project No. 2025-00523-AE-0023)

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review the report titled "Audit of the Department of Veterans Affairs' (VA) Police Staffing Decision Tool (Project No. 2025-00523-AE-0023)." The Office of Operations, Security, and Preparedness (OSP) concur with the recommendations and provides the attached action plan, developed in coordination with the Office of Human Resources and Administration (HRA).

2. OSP is committed to working collaboratively with HRA to update the VA Police manpower tool. This report highlights an opportunity for us to strengthen processes to validate and disseminate staffing tools that will ultimately aid the larger VA police realignment effort.

The OIG removed point of contact information prior to publication.

(Original signed by Ian Dineson, for)

Reginald G. Neal Ed.D.

Attachment

Appendix E: VA Management Comments, Office of Human Resources and Administration

Department of Veterans Affairs Memorandum

Date: March 16, 2026

From: Assistant Secretary for Human Resources and Administration (006)

Subj: Office of Inspector General Draft Report, Audit of Department of Veterans Affairs' Police Staffing Decision Tool (Project No. 2025-00523-AE-0023)

To: Assistant Inspector General for Audits and Evaluations (52)

1. Thank you for the opportunity to review the report titled "Audit of the Department of Veterans Affairs' (VA) Police Staffing Decision Tool (Project No. 2025-00523-AE-0023)." The Office of Human Resources and Administration (HRA) concurs with the recommendations and provides the attached action plan, developed in coordination with the Office of Operations, Security, and Preparedness (OSP).
2. HRA is committed to working collaboratively with OSP to update the VA Police manpower tool. This report highlights an opportunity for us to strengthen processes to validate and disseminate staffing tools that will ultimately aid the larger VA police realignment effort.

The OIG removed point of contact information prior to publication.

(Original signed by)

Mark R. Engelbaum

Attachment

Department of Veterans Affairs (VA)
Action Plan
OIG Draft Report: Audit of VA's Police Staffing Decision Tool
(Project Number 2025-00523-AE-0023)

Recommendation 1: Identify all relevant stakeholders and formally define roles and responsibilities for the police staffing decision tool or similar model.

Comments: Concur. In Fall 2025, the Office of Security and Law Enforcement (OSLE) and the Manpower Management Service (MMS) identified and convened relevant stakeholders with roles and responsibilities for the police staffing decision tool. As a result, the group became the Department of Veterans Affairs (VA) Police Staffing Integrated Project Team (IPT), responsible for developing an updated VA Police manpower model. VA is also drafting a charter to update the model, including documenting roles and responsibilities for the model.

Status: Ongoing Target Completion Date: Fiscal year 2026, Quarter 3

Recommendation 2: Coordinate with all relevant stakeholders to address vulnerabilities with the police staffing decision tool or a similar model.

Comments: Concur. VA is coordinating with all relevant stakeholders, through the VA Police Staffing IPT, to develop an updated VA Police manpower model. Once completed and validated, the updated model will address vulnerabilities with the police staffing decision tool identified by the Office of Inspector General.

Status: Ongoing Target Completion Date: Fiscal year 2027, Quarter 1

Recommendation 3: Ensure the Manpower Management Service's standard operating procedures are followed to document formal completion of the police staffing decision tool or a similar model.

Comments: Concur. VA will ensure that the MMS Model Validation Standard Operating Procedures (SOP) are followed to document formal completion of the updated VA Police manpower tool. The updated VA Police manpower model will be validated and documented in accordance with the SOP (via signed validation memorandum).

Status: Ongoing Target Completion Date: Fiscal year 2027, Quarter 1

Recommendation 4: Assign accountability for disseminating the finalized police staffing decision tool or a similar model and ensuring its use.

Comments: Concur. The Office of Operations, Security, and Preparedness (OSP), through OSLE, utilizing the new organizational structure from the consolidation of VA Police, will assign responsibility for disseminating the finalized police staffing decision tool or a similar model through the VA Police Region and District Chiefs. OSP/OSLE will also ensure appropriate use of the police staffing decision tool through the Police Program Inspection process during routine and spot inspections of Police Services throughout the VA Police enterprise. OSP/OSLE will also work collaboratively with MMS to ensure that accurate data is entered into the police staffing decision tool.

Status: Ongoing Target Completion Date: Fiscal year 2027 Quarter 1

For accessibility the original format of this appendix has been modified to comply with Section 508 of the Rehabilitation Act of 1973, as amended.

OIG Contact and Staff Acknowledgments

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