



OFFICE OF  
**INSPECTOR GENERAL**  
U.S. DEPARTMENT OF THE INTERIOR

# **THE NATIONAL PARK SERVICE NEEDS POLICIES OR PROCEDURES COVERING PRISON WORK DETAILS IN NATIONAL PARKS**



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APR 02 2020

Memorandum

To: George "Rob" Wallace  
Assistant Secretary for Fish and Wildlife and Parks

From: Mark Lee Greenblatt   
Inspector General

Subject: Management Advisory – *The National Park Service Needs Policies or Procedures Covering Prison Work Details in National Parks*  
Case No. OI-GA-18-0898-I

We recently concluded an investigation into allegations that a National Park Service (NPS) employee assisted inmates to smuggle contraband into a U.S. penitentiary through a prison work detail on an NPS property. Our report of investigation on the matter (Report No. OI-GA-18-0898-I, *Alleged Smuggling of Contraband*) details our findings related to the smuggling allegations and will also be issued in April 2020.

Our investigation found that on the day the contraband was found, the inmates, whose criminal histories included firearms- and drug-related convictions, had been left working unsupervised in a park's campground for approximately 2 hours. We further found that the NPS has no policies or formal procedures in place for the management of inmates while they are under the supervision of the NPS and working in national parks. We did not identify relevant NPS policies at the park, region, or headquarters levels. This policy void led to NPS employees overseeing prison inmates without any training or formal guidance, inmates gaining access to contraband such as tools and knives, and inmates being left working unsupervised for hours while on park grounds.

We also found that prison work detail agreements differed from park to park, because they were coordinated and approved at the park level between the local NPS superintendent and the supporting prison facility. When we asked the NPS for documentation on these prison work details, the NPS identified five memoranda of understanding, three cooperative agreements, and three task agreements being used Servicewide. We also found that two national parks used prison work details without any written agreement in place at all. The NPS does not require review and approval of these agreements at any higher level than the local park; moreover, there is no review by the U.S. Department of the Interior Office of the Solicitor (SOL). The absence of standardization and oversight of these agreements resulted in parks using a variety of methods to create them, such as memoranda of understanding and interagency agreements, when they do not necessarily have the authority to do so.

The absence of NPS policies and oversight regarding prison work details at NPS properties creates risks to NPS employees, park visitors, and the prison community, and may expose the U.S. Department of the Interior to liability.

## **Recommendations**

In order to improve the safety and security of NPS employees and park visitors, and to ensure consistent approval and employment of prison work details across the NPS, we recommend that the NPS:

1. Develop and implement policies and procedures that standardize agreements between the NPS and prisons, define how NPS employees use inmate work details, and establish requirements for transporting and supervising inmates while they are under NPS supervision
2. Require all agreements between the NPS and Federal, State, or private prisons to be reviewed and approved by NPS headquarters and the SOL and maintained nationally by an NPS official
3. Train NPS employees assigned to duties associated with prison work details on specific safety issues related to transporting and supervising prisoners

Please provide us with a written response to this memorandum within 90 days describing the actions you have taken, or plan to take, to address the issues and our recommendations. You may either email your response to [doioigreferrals@doioig.gov](mailto:doioigreferrals@doioig.gov), or mail to:

Office of Inspector General  
U.S. Department of the Interior  
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In accordance with the IG Empowerment Act of 2016, we intend to publish this memorandum on our website, in redacted form, no later than 3 days from the date we issue it to you. Within the next 10 business days, a representative from our Office of Investigations will contact you, or your designee, to discuss the memo and the status of your response. If you have any questions or need further information concerning this matter, please contact Matthew Elliott at 202-208-5745.

cc: David Vela, Deputy Director for Operations, National Park Service  
Daniel Jorjani, Solicitor, U.S. Department of Interior

