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April 27, 2021

Acting Director Shawn Bengge
National Park Service
Main Interior Building
849 C Street NW
Washington, D.C. 20240

Acting Director Shawn Bengge,

We are writing to you concerning the placement of National Park Service (NPS) Law Enforcement Park Rangers in the appropriate job series. Currently, these Law Enforcement professionals have been historically lumped into the general Ranger GS-0025 series despite their extensive training and mission sets which necessitate moving them to a more appropriate and expertise driven series.

On January 14, 2021, after years of study, the NPS completed a review of the GS-0025 occupational series. The review concluded that the series did not warrant conversion of Law Enforcement Park Rangers from the GS-0025 to the GS-1801 series. This memo was released as many of your officers and special agents were travelling to the nation's capital, other high profile areas, or filling in at home for those travelling, to perform important policing and protection oriented missions to provide for the security and protection of the NPS and its employees, visitors, and assets. The memorandum, its content, and the context of its dissemination appeared unsupportive and dismissive of the expertise and important work the NPS Law Enforcement Rangers perform.

The memo stated in part that, "...the broad spectrum of major duties and assignments, and the "mixed series" nature of NPS Park Ranger positions... supports placement in the 0025 occupational series. An analysis of the five factors required in the OPM's Classifier's Handbook for mixed series positions demonstrates that the paramount knowledge required, reason for existence, organizational function, line of promotion, and recruitment source further supports placement in the 0025 occupational series.

Under the same OPM position description, it also lists exceptions to this job series to include botanist and wildlife biologists, historians, guides and outdoor recreation specialists. It also specifically lists "Work in planning and conducting case investigations of persons or organizations that require application of full investigative knowledge, skills, techniques, and methods, and several days or extended periods of information collection, analysis, and evaluation for completion (See definitions and standards for the General Investigating Series, GS-1810, or the Criminal Investigating Series, GS-1811, as appropriate,) and Law enforcement work in protecting life and property by maintaining law and order, preventing crime, detecting or investigating violations of law, preserving peace, and enforcing laws (See definitions and standard for the Police Series, GS-0083.)" Yet despite these exceptions, and the corresponding law enforcement position classifications specifically addressing those exceptions, Law Enforcement Park Rangers remain under the general and broadly defined GS -0025 job series.

While these law enforcement duties and exceptions clearly exist in other classifications, demonstrating that Law Enforcement Park Rangers should be classified under a policing and investigations position description, the National Park Service continues to maintain its law enforcement rangers in the broad and general GS-0025 job series. This series has

existed since 1959 when the federal government created it and almost twenty years before law enforcement and police powers were granted to certain employees in 1976. NPS law enforcement policy received a major revision in the 1990s resulting in a more clearly defined and professional law enforcement program by 2000. Clearly the level of training, expertise, mission focus and scope of professional law enforcement function and responsibilities have evolved and increased dramatically since 1959, 1976 and even 2000, yet these position descriptions remain overly broad, general and stagnant. This stagnation was punctuated when in 2005, the GL positions for law enforcement rangers was instituted creating a further distinction between non-law enforcement and law enforcement park rangers.

The NPS is currently responsible for managing the law enforcement responsibilities of the United States Park Police, and its own NPS Investigative Services Branch of GS-1811 Criminal Investigators within its agency mission. However, it continues to maintain the vast majority of its commissioned police personnel, or Law Enforcement Park Rangers, in the same job series as “botanists, historians and craft demonstrators.” Other Department of Interior agencies, such as Bureau of Land Management Rangers, Bureau of Indian Affairs Police, and Fish and Wildlife Rangers, including the Department of Agriculture and US Forest Service Rangers, have placed their sworn commissioned officers under the more relevant GS-1801 job series.

It is believed that the improper job classification of the NPS law enforcement park ranger continues to hamper recruitment, diversification and retention within the NPS law enforcement workforce. The remaining disparities by refusing to acknowledge the modern and professional policing needs of the position and agency continue to hamper management of law enforcement and criminal investigations within the service. Law enforcement park rangers continue to see positions vacated and eliminated, creating an understaffed and overworked patrol and investigation presence, throughout the NPS, with growing visitation and threats facing our national parks. This continued dangerous dynamic for its law enforcement mission increases the importance of a more professional and committed law enforcement staff and operation. It is more imperative than ever, that NPS Law Enforcement Park Rangers are equipped to meet their public service mission, maintain the public safety and protect property, and natural and cultural resources.

Our nation’s parks are the crown jewels of our nation, its history and represent our collective national conscience. The importance of protecting them has never been so pronounced as they face increased of encroachment, gang activity, violence, human and illicit drug trafficking, theft, pollution, domestic and environmental terrorist activities and other crimes. The NPS Law Enforcement Park Ranger, Special Agent and U.S. Park Police Officer and Detective, are being called on as never before to ensure our parks, its residents, visitors, resources and assets are safe. Doing so necessitates that the National Park Service place the law enforcement park ranger in a job position description that ensures their training, expertise and mission are appropriately enhanced and professionally managed.

With that in mind, we request that the National Park Service reevaluate the work, training and skills NPS Law Enforcement Park Rangers conduct, and work with the OPM placing them within in an appropriate job category. In our view, that category should be in the GS-0083, 1801 or 1810 job series.

Sincerely,

Larry J Cosme

Larry Cosme

National President

cc: Director, Office of Personnel Management
House Committee on Oversight and Government Reform
Senate Homeland Security and Governmental Affairs Committee

