



Office of the Inspector General

Police Division Safety & Training Audit

Police Department &
Homeland Security Department



OIG Project Number 25-FST-01

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OG #20241016-022200

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Thru: Dana E. Whiting, Deputy Inspector General for Audit
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From: Jane N. Lewis, Supervisory Auditor
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 Office of the Inspector General 

Date: August 17, 2026

Subject: **Police Division Safety & Training Audit**

OG #20241016-022201

The Office of the Inspector General (OIG) for the Washington Suburban Sanitary Commission (WSSC) has completed an audit of the Police Division's safety and training program. A detailed audit report is attached for your review. The OIG conducted the audit per the U.S. Government Accountability Office's Generally Accepted Government Auditing Standards (GAGAS). We have already discussed issues of concern with management, and their action plans are included in this report.

We appreciate the assistance provided by management and other personnel and hope the information in our report is helpful.

Attachment

cc: Chief of Staff, (J. DeVantier)
 Deputy General Manager, (D. McDonough)
 Director, Performance & Accountability, (H. Hagos)
 Police & Homeland Security Director, (R. Maloney)
 Chief of Police, (M. Delaney)
 Corporate Secretary, (J. Montes de Oca)

Background

In accordance with the Washington Suburban Sanitary Commission's (WSSC) Office of the Inspector General's (OIG) Fiscal Year 2026 Risk-Based Work Plan and the authority granted to the OIG pursuant to Public Utilities Article (PUA), § 17-605 (a)(6) of the Annotated Code of Maryland, the OIG conducted a compliance audit of WSSC's Police and Homeland Security Division to assess compliance with applicable Maryland laws, regulations, and WSSC policies related to firearm safety and officer training. The OIG conducted the audit in accordance with the U.S. Government Accountability Office's Generally Accepted Government Auditing Standards (GAGAS).

The Maryland General Assembly granted WSSC Water the authority to establish and maintain its own police force as set forth in PUA, § 28-201. On October 1, 2002, WSSC established its own police department to protect the Commission's water resources and critical infrastructure. WSSC police officers exercise the same powers and authority as other law enforcement officers in Maryland on property owned, leased, operated, or controlled by the Commission. This statutory authorization empowers the WSSC Police Department to protect Commission personnel, facilities, infrastructure, assets, and the public while carrying out law enforcement functions within its authorized jurisdiction.

In exercising this authority, the WSSC Police Department must comply with applicable standards, regulations, and certification requirements established by the Maryland State Police and the Maryland Police Training and Standards Commission (MPTSC), which are set forth in Title 3, Subtitle 2 of the Maryland Code Annotated, Public Safety Article (PSA). These requirements govern, among other matters, the selection, training, certification, and professional conduct of law enforcement officers and help ensure that WSSC police officers meet the same professional standards as other law enforcement agencies throughout Maryland.

The WSSC Police Department's primary jurisdiction is limited to Commission property and facilities, except under specific conditions, in which officers may exercise law enforcement beyond those areas, such as fresh pursuit or traffic management activities related to WSSC operations. A recognized law enforcement agency in Maryland, the Department may authorize its officers to carry firearms, provided they meet the rigorous training, certification, and annual requalification requirements established by the MPTSC. In addition, the Washington Suburban Sanitary Commission Police Department Policy Manual (effective Dec. 10, 2024) and the WSSC Code of Regulations (Code), Chapter 9.170, establish comprehensive standards governing officer qualifications, background investigations, training, conduct, and accountability. Together, these statutory, regulatory, and internal requirements demonstrate that the WSSC Police Department operates within a well-defined framework of legal authority, professional standards, and oversight.

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The objective of this audit was to provide management with an independent assessment of the Police Department's firearm safety and training program. Specifically, the OIG sought to:

- Determine whether the WSSC Police Department complied with applicable Maryland laws, regulations, and WSSC policies and procedures governing officer safety and training;
- Determine whether the Division provided, documented, and monitored firearm training and annual requalification for sworn officers in accordance with MPTSC and Commission policy requirements; and
- Assess the effectiveness of internal controls and procedures governing retired, traded, or otherwise removed-from-active-service firearms to ensure such weapons were properly accounted for and protected against loss, theft, diversion, and misuse.

Scope and Methodology

The audit scope covered safety and training records for firearms used by 21 WSSC sworn law enforcement officers from July 1, 2024, to June 30, 2025. To achieve the audit's objectives, the OIG:

- Reviewed applicable laws, regulations, policies, procedures, standards, and internal documentation to define audit criteria;
- Interviewed WSSC Water's Director of General Services and Chief of Police, who are responsible for overseeing firearm disposal activities, to assess compliance with applicable Maryland laws, regulations, and WSSC governing policies;
- Reviewed Maryland Code Annotated, Public Safety Article (PSA), § 3-524 (2024) and WSSC Police Department Policy Manual, Policy No. 102, Oath of Office, § 102.4, and Policy No. 203, Training, § 203.5.1 (effective Dec. 10, 2024), and assessed the Department's compliance with applicable training and firearm safety requirements; and,
- Examined training records and related documentation to assess compliance with MPTSC requirements and evaluated whether management reports complied with Md. Code § 12.04.01.12 (Police Officer Annual In-Service Training and Qualification) and WSSC Policy 203.2.

GAGAS requires the OIG to plan and perform the audit to obtain sufficient and appropriate evidence that provides a reasonable basis for our findings and conclusions, in accordance with the audit objectives. Accordingly, based on the audit's scope and objectives and the evidence obtained, we provide a reasonable basis for the findings and conclusions set forth herein.

Conclusion

Based on the audit work performed, the OIG found that the Police Department generally complied with applicable Maryland laws, WSSC regulations, and the Maryland Police Training and Standards Commission (MPTSC) requirements during the audit period. The audit of training records revealed full compliance with laws, regulations, and Police Policy. Firearms training documentation for sworn officers was verified, confirming that all completed the required MPTSC requalification sessions. Attendance logs confirmed participation in required training, with no exceptions or discrepancies, demonstrating a strong commitment to maintaining high training standards. However, the OIG noted the following:

- The Police Department had no documentation demonstrating compliance with the Sanctity of Life Pledge Requirements; and
- The Police Department does not have formal procedures for disposing of firearms.

The OIG thanks all parties for their cooperation and professionalism throughout the audit. The Police Department leadership and staff were approachable, responsive, and transparent, and they readily provided information that improved the audit's efficiency and quality.

Finding 1: No documentation demonstrating compliance with Sanctity of Life Pledge Requirements

Risk Rating: Medium

Pursuant to PSA, § 3-207 and WSSC Police Dep't Policy Manual, §§ 102.5 (Maintenance of Records) and 203.9 (Training Records), the Department is required to maintain documentation demonstrating compliance with applicable training, certification, and use-of-force requirements. Such documentation includes records evidencing completion of required training and any written acknowledgments.

Further, PSA, § 3-524 and WSSC Police Dep't Policy Manual § 102.4, *Sanctity of Life Pledge*, require a police officer to sign an affirmative written *Sanctity of Life Pledge* and a training completion acknowledgment certifying that the officer understands and will comply with the *Maryland Use of Force* statute. Specifically, PSA, § 3-524 (c) requires a police officer to affirm that they will respect every human life and act with compassion toward others. This requirement is further defined in PSA, § 3-524 (h)(2), which states that officers will attempt de-escalation when feasible, intervene when another officer uses unauthorized force, render basic first aid and request medical assistance when needed, and document all incidents.

While neither PSA, § 3-524 nor Department policy specifies a separate renewal period for the written acknowledgment, officers are required to receive ongoing use-of-force training as part of MPCTC certification and in-service training requirements. Further, although Policy 102.5 does not expressly address retention of *Sanctity of Life Pledges*, the Department's obligation to demonstrate compliance with Policy 102.4 and PSA, § 3-524, reasonably requires the maintenance of records evidencing that officers executed the required pledge.

Since firearms, use-of-force, and related training are conducted on a recurring basis pursuant to the MPCTC and Department requirements, the corresponding training acknowledgments and certifications should be maintained and renewed as part of each training cycle.

The OIG found that the Police Department maintained *Sanctity of Life Pledges* for only 2 of 18 officers (11%) during the scoping period, both of whom were newly hired. The Police Department could not locate or produce signed pledges for the 16 officers who were already in service before or during the scoping period. Additionally, the Police Department did not provide evidence that officers had acknowledged or agreed to comply with the State's required *Use of Force* statute by having signed training acknowledgments or similar documents. Following the OIG's inquiry, the Police Department obtained signed *Sanctity of Life Pledges* from all officers and achieved compliance in FY 2026.

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The Police Department did not maintain *Sanctity of Life Pledges* primarily because no one was aware that the pledges were required of all officers, including in-service officers. The Chief of Police confirmed that WSSC has no internal policy requiring ongoing affirmation beyond the submission of signed forms to MPCTC at onboarding and during mandatory training. While this practice maintains certification, it does not satisfy WSSC's legal obligation to retain internal documentation. Leadership further stated that the *Sanctity of Life Pledge* is required by MPCTC only at initial certification with a new agency and is completed then, which is inaccurate because PSA, § 3-524 covers all officers.

Failure to maintain required documentation impairs WSSC's ability to demonstrate compliance in legal proceedings involving use-of-force incidents, leading to diminished organizational accountability, increased legal and regulatory exposure, and a potential loss of public trust. These documentation gaps also hinder the agency's ability to demonstrate 100% compliance with statutory and policy mandates and may adversely affect operational effectiveness.

Recommendation 1: Strengthen compliance with statutory and regulatory record-keeping requirements

The OIG recommends implementing a centralized compliance monitoring process or system to track completion of all sworn officers' training and the retention of required *Sanctity of Life Pledges* and training documentation. The process should include regular monitoring of missing or expired documentation. We also recommend that the Police Department designate a compliance officer to verify, collect, and maintain all required documentation and to regularly report compliance status to agency leadership. The Compliance Officer may also communicate statutory and regulatory documentation requirements to all personnel, including supervisory staff responsible for compliance oversight.

These measures are essential to prevent documentation gaps, enable the agency to demonstrate and potentially enhance compliance with statutory and policy mandates, and enhance the force's operational effectiveness for parallel structure. The Compliance Officer will oversee adherence to disciplinary protocols and resolve issues in accordance with those protocols.

Management Response and Action Plan (including anticipated due date)

The Police & Homeland Security Division concurs with the recommendation to strengthen documentation and record retention practices related to the Sanctity of Life Pledge.

The Division recognizes the importance of maintaining complete and readily accessible records that demonstrate compliance with applicable legal and departmental requirements. To address this recommendation, the Division has already obtained signed Sanctity of Life Pledges from all sworn personnel.

To further strengthen compliance and documentation practices, the Division will implement an Internal Operating Procedure (IOP) requiring all sworn officers to review and execute a Sanctity of Life Pledge annually. The IOP will establish procedures for distribution, collection, retention, and compliance tracking to ensure consistent documentation and accountability throughout the agency. The IOP will be finalized and implemented no later than September 1, 2026.

Finding 2: No Formal Procedures for Disposing of Firearms**Risk Rating: Low**

According to PSA, § 3-501, *Disposal of Handguns Owned by Law Enforcement Agencies*, a law enforcement agency seeking to dispose of a handgun owned by the agency shall, (1) destroy the handgun; (2) sell, exchange, or transfer the handgun to another law enforcement agency for official use by that agency; (3) sell the handgun to a retired police employee or to whom the handgun was assigned; or (4) sell, exchange, or transfer the handgun to a manufacturer.

Further, pursuant to WSSC Manual of Standard Procedures, Handguns and Other Law Enforcement Weapons, § 13.80.050 (b)(4)(i), the WSSC Police and Homeland Security Firearms Custodian/Armorer, with the concurrence of the General Services Director, determines how to dispose of handguns and other law enforcement weapons. The disposal process requires that surplus handguns be disposed of in accordance with PSA, § 3-501. Additionally, §13.80.060 provides that taking, disposing of, or using WSSC business property or scrap metal without permission constitutes theft and may result in disciplinary action, termination of employment, and/or criminal prosecution.

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The audit disclosed that the Police Department lacks written procedures or control activities governing the disposition of controlled assets, including firearms, to ensure compliance with applicable statutory and WSSC requirements. Although WSSC adopted disposal requirements for handguns and other law enforcement weapons on June 21, 2023, the Department has not yet developed documented procedures to implement those requirements. Specifically, WSSC Manual of Standard Procedures, § 13.80.050 (b)(4)(i) requires the WSSC Police and Homeland Security Firearms Custodian/Armorer, with the concurrence of the Director of General Services, to determine the disposition of handguns and other law enforcement weapons in accordance with PSA, § 3-501.

The Police Chief confirmed that no firearms were disposed of during the audit period and that the Division was unaware of this legal requirement. Although no disposals occurred during the audit period, the lack of defined procedures and controls increases the risk that future disposals may not comply with statutory and regulatory requirements, and that unauthorized disposals or inventory losses may occur.

Without formal procedures, the Department cannot ensure consistent coordination between the Firearms Custodian/Armorer and the General Services Director, maintain adequate documentation of disposal decisions, or verify that surplus firearms are disposed of through authorized methods. As a result, the Department faces an increased risk of noncompliance, weakened accountability for controlled assets, and potential inventory-control deficiencies.

Recommendation 2: Create Weapons and Handguns Disposal Procedure

To strengthen internal controls and ensure compliance with applicable statutory and WSSC requirements governing the disposition of firearms and other law enforcement weapons, the OIG recommends that the Police Department:

Develop and implement written policies and procedures governing the disposition of firearms and other law enforcement weapons in accordance with PSA, § 3-501, and WSSC Manual of Standard Procedures, § 13.80.050 (b)(4).

Establish control activities requiring documentation and approval of all firearm disposal decisions, including coordination between the Firearms Custodian/Armorer and the General Services Director, as required by WSSC procedures.

- Provide periodic training to personnel responsible for firearm inventory management and disposal to ensure they are aware of applicable legal, regulatory, and departmental requirements.

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- Designate a Training Coordinator to monitor compliance with firearm inventory and disposal requirements and to ensure that training materials, policies, and procedures are updated to reflect changes in applicable laws, regulations, and Commission requirements.

Implementation of these recommendations will strengthen accountability over controlled assets, reduce the risk of unauthorized disposals, improve inventory controls, and help ensure compliance with applicable statutory and WSSC requirements.

Management Response and Action Plan (including anticipated due date)

The Police & Homeland Security Division concurs with the recommendation to establish formal procedures governing the replacement and disposition of duty-issued firearms and other law enforcement weapons.

Although no firearms were disposed of during the audit period, the Division agrees that formal written procedures are necessary to ensure consistency, accountability, and compliance with applicable laws and agency requirements.

To address this recommendation, the Division will develop and implement an Internal Operating Procedure (IOP) governing the replacement and disposition of duty-issued firearms. The procedure will establish guidelines for replacing firearms that have reached the end of their service life and for properly disposing of firearms that are no longer serviceable or suitable for duty use. All firearm dispositions will be conducted in accordance with applicable Maryland law and WSSC policy. The IOP will be finalized and implemented no later than September 1, 2026.