



United States Department of the Interior

NATIONAL PARK SERVICE

National Capital Region

1100 Ohio Drive, S.W.

Washington, D.C. 20242

IN REPLY REFER TO:

10.1 (NCR-CHOH)

June 20, 2019

Kevin Brandt
1850 Dual Highway
Suite 100
Hagerstown, Maryland 21740

Dear Superintendent Brandt:

Thank you for requesting an independent review of the Chesapeake and Ohio Canal National Historical Park volunteer program. I appreciate your goal of strengthening the park's VIP programs and operations.

At your request, our team began its assessment in late April 2018. The attached report documents the team's methodology, summarizes findings, captures the strengths of your program, and provides recommendations to address areas of concern.

Per our conversations, the park has 90 days to provide the region a written response and schedule detailing how the report's recommendations will be prioritized and implemented. A top priority for the park should be addressing concerns identified with the Bike Loaner Program operation at Great Falls and ensuring all volunteer programs are being managed in accordance with current law and policy.

The National Capital Region was pleased to review and assess your volunteer program. I hope that this assessment will be a helpful tool as you work to align your award-winning volunteer program with the park's Strategic Plan. The region looks forward to supporting the park and your dedicated volunteers as you move forward.

Sincerely,

Lisa A. Mendelson-Ielmini

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Acting Regional Director



Volunteer Program Assessment Report Chesapeake & Ohio Canal National Historical Park



Volunteer Program Assessment Report Chesapeake & Ohio Canal National Historical Park

Reviewed by:

Lisa A Mendelson - Tolmieri
Lisa Mendelson - Acting Regional Director
National Park Service - Region 1 (National Capital)

June 24, 2019
Date

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Assessment Team

K. Lynn Berry, Acting Associate Regional Director, Partnerships and Visitor Experience,
National Capital Regional Office (NCRO)

Jennifer Kavanaugh, Volunteer and Partnership Program Coordinator, Delaware Water Gap
National Recreation Area

Einar Olsen, Assistant Regional Director – Inspections and Evaluations, NCRO

Aurelia Casarrubias, Community Volunteer Ambassador, Fellow of Hispanic Access
Foundation, NCRO

Volunteer Program Assessment Report

Chesapeake & Ohio Canal National Historical Park

This report summarizes the findings from an assessment of the Volunteers-in-Parks (VIP) program at Chesapeake and Ohio Canal National Historical Park (CHOH).

Since 1970, the VIP program has enabled the National Park Service (NPS) to accept and use voluntary services from the public to help preserve and protect America's natural and cultural heritage for the enjoyment of this and future generations¹. At CHOH, more than 3,400 volunteers are organized by the park into dozens of smaller groups in support of hiking, biking, history, interpretation, special events, and other pursuits within the park.

At the request of the superintendent of CHOH in late April 2018, this analysis was undertaken by the National Capital Region (Region) as a first step to align the VIP program with park's strategic goals. The Region recommends that the next step for the park will be to develop a work plan from the observations outlined in this review and to consider the best options to safely and responsibly manage a complex VIP program at the appropriate scale for the mutual benefit of the NPS and the volunteers.

From the now completed CHOH Strategic Plan, September 2018:

***Goal 3: Collaborate Purposefully:** Engage stakeholders who are focused on the implementation of shared priorities that align with the park's vision, goals, and capacity.*

Strategy 2: Involve Volunteers

Action 1: Assess existing and proposed volunteer programs and operations to ensure alignment with park goals and strategies, including best practices.

Objectives for This Review

- Identify relevant policies, criteria, or other factors that guide the park in developing a sustainable park volunteer program;
- Identify potential areas of concern in the volunteer program, including those related to roles, responsibilities, chain of command, and span of control.
- Provide recommendations to park management for their consideration in making feasible and sustainable improvements to the program.

¹ Public Law 91-357

Methodology

The process was led by the National Capital Regional Office (NCRO) Inspections and Evaluations Division. The assessment team held a listening sessions with several volunteer on May 9, 2018 and a kick-off workshop to develop assessment objects with park leadership and volunteer managers on May 21, 2018.

The assessment team consisted of four NPS staff with experience in management consultancy and volunteer program management. Principal data inputs for the review were a nine question survey, interviews, two group meetings to receive additional input from volunteers, and a review of legislation and park program management documents. The main areas of the program that were reviewed under Director's Order #7 were supervision, communication and recognition, job descriptions, training, safety and oversight, and bike donations.

Park and VIP Program Overview

In 2018 the park reported that they were working with 3,265 volunteers. The C&O Canal Trust, the park's primary non-profit partner, directly supervises 1,785 of these volunteers. The remaining 1,480 are supervised directly by CHOH staff. The VIP corps consists of individual volunteers, volunteer leads (volunteers who lead other volunteers when doing projects or programs), and other small groups. They have varying lengths of service and experiences in the park.

The VIP program at C&O Canal officially began in 1996 to help the park recover from a series of devastating floods that required more labor hours than the park could provide. At that time, the park saw about 1 million visitors annually and was staffed by 162 full-time employees. Twenty-two years later visitation has increased to nearly 5 million with 74 full-time employees at the park. During this period, the volunteer program expanded rapidly and is now one of the largest and most complex programs in the country.

Currently, the park has 53 active volunteer programs under the VIP umbrella, ranging from biking (Bike Patrol and the Bike Loaner Program), walking and hiking (Billy Goat Trail Stewards and Level Walkers), safety (EMS Patrol and First Aid Trainers), visitor center operations, trail maintenance, invasive plant species removal, interpretation, and more. Volunteers are active along the entire length of the park. Some of these volunteers are recruited and others apply to be part of a specific group.

CHOH was established in 1971 to preserve and protect the Canal and surrounding natural areas. Canal construction began in 1828 as part of a project to connect the Chesapeake Bay and the Ohio River, though only the eastern portion was completed. The Canal runs parallel

to the Potomac River from Washington, D.C., to Cumberland, Maryland, and was used until 1924. The park covers approximately 20,200 acres, spans 184.5 miles, and is the 9th most visited national park in the nation, with almost 5 million annual visitors.

Along the length of the canal, there are 74 lift locks, of which 6 have associated lockhouses that have been preserved and are available for overnight stays. There are also 7 dams, 11 aqueducts, more than 150 culverts, 38 campgrounds, 15 boat ramps, and dozens of miles of trail infrastructure in addition to the canal towpath.

Due to the long, linear nature of the park, there are many towns along its length. Georgetown (where the canal begins in Washington, D.C.), Poolesville, Point of Rocks, Brunswick, Harpers Ferry-Bolivar, Shepherdstown, Sharpsburg, Williamsport, Hancock, and Cumberland (the western terminus of the canal) are among the destinations. Access to the park is nearly unlimited, and there is only one location, Great Falls, with an entrance fee.

The first 25 miles of the park including Great Falls and Georgetown and hosts a large number of distinct program. These programs account for the largest number of area-specific volunteers (605) and volunteer hours (26,965) in the park. The Cumberland District hosts a Bike Patrol program, maintenance projects, and visitor center and lockhouse operations, among others, supported by over 100 volunteers. The Williamsport district include 70 and 36 volunteers, respectively. At park headquarters, nearly two dozen park-wide programs are administered, such as those undertaken by the C&O Canal Trust, Canal Stewards, and other groups; these account for the highest number of volunteers in total (2,582).

Relevant Policies

The National Park Service VIP program was enacted by Public Law 91-357 on July 29, 1970. Since that time, hundreds of thousands of volunteers have added strength to our workforce and helped the National Park Service achieve its mission.

Overall direction for the VIP program is outlined in the NPS [Management Policies \(2006\)](#), which cites the Volunteers in the Parks Act of 1969 as the authority (now codified at [54 U.S.C. § 102301](#)) under which the VIP program operates, and outlines the principal statutory requirements:

“Pursuant to this statute, volunteers may be recruited without regard to civil service regulations; are covered for tort liability and work-injury compensation; and may be reimbursed for out-of-pocket expenses while participating in the program. However, volunteers cannot be used for law enforcement work or in policymaking processes, or to displace NPS employees. Volunteers may perform hazardous duties only if they possess the necessary

skills to perform the duties assigned to them. Volunteers will be accepted without regard to race, creed, religion, age, sex, color, national origin, disability, or sexual orientation. NPS housing may be used for volunteers.”

Additional guidance for VIP management can be found in [Director’s Order #7: Volunteers-in-Parks](#) (DO-7), and the accompanying [Draft Reference Manual #7 \(RM-7\)](#). Director’s Orders are tools for guiding the internal management of the NPS. Sections of DO-7 will be referenced throughout the body of this report, as deemed relevant to issues identified by the assessment team.

NPS regional directors or associate directors, as well as superintendents may issue, within formal delegations of authority, additional specific instructions, procedures, directives, and other supplementary guidance, provided that the guidance does not conflict with Service-wide policy. In the case of the CHOH, the superintendent has issued the following supplemental guidance documents:

- CHOH Volunteer Handbook
- CHOH Volunteer Uniform Policy
- CHOH Statement of Volunteer Rights and Responsibilities

CHOH VIP program managers have also issued instructions and procedures for specific volunteer groups at the park, such as the Billy Goat Trail Steward Program Manual, Bike Patrol Guidelines and the Canal Stewards site adoption agreements.

Expectations for performance are also outlined in specific Volunteer Service Agreements (VSA), also known as Optional Form 301a, accompanying volunteer position descriptions (PD) and Job Hazard Analyses (JHA).

Observations and Recommendations

This section describes observations made by the review team of the VIP operation as they relate to the National Park Service policies. The areas of policy that were addressed were supervision, communication and recognition, job descriptions, training, and safety and oversight. The observations sections proposes areas of strength and areas for improvement, which is then followed by team recommendations.

General Recommendations

The assessment team strongly recommends that the park:

- Develop a plan that outlines all the volunteer programs and staff (both VIPs and NPS supervisors) needed to implement those programs, and identify how the programs align with park goals.
- Review VIP program policies and evaluate the degree to which the park aligns with them, and then establish local policies where warranted.
- Develop standard operating procedures for each volunteer program and identify the job descriptions needed for each program.
- Develop standard performance review forms to evaluate each volunteer program and of each volunteer on a yearly basis.
- Collect the same type of data for each program, such as program name, number of hours, number of volunteers, and number of contacts with the public.

Supervision

Key Policies/Guidance:

DO-7, § 8.1: The NPS must provide adequate training and supervision for individuals and/or groups enrolled as Volunteers-In-Parks. Ultimate responsibility for this rests with the appropriate NPS management official, i.e., Superintendent or Program Manager.

DO-15.2 Anyone supervising VIPs is eligible for supervisory training. Such training is mandatory for those supervising VIPs (any number) whose combined hours of service equal or exceed 6,261 hours per year (i.e., those of three full time employees).

RM-7, § 3: Although the park volunteer program manager is responsible for the overall coordination of the park's VIP program, he/she is not the only person who may directly supervise volunteers. Staff members who are directly responsible for the volunteers' work usually supervise these volunteers.

RM-7, § 15. Supervising VIPs requires the same skills and techniques as supervising paid employees, plus several more. VIPs want adequate supervision, direction, and guidance so that their donated time is utilized effectively. Just as in supervising paid employees, the goal of a good VIP supervisor is to help the volunteer feel productive, successful, supported, recognized, and rewarded.

Observations:

Staff and volunteers believe that aspects of the program are working well. In the course of reviewing responses to the written questionnaire from both staff and volunteers, as well as the personal interviews, the assessment team noted that there are areas of strength within the CHOH VIP program, which are discussed below. There are also areas of improvement needed for the program, also discussed below.

During the past 20+ years, the NPS staff at the park has decreased from 162 to 74 positions. At the same time there has been a great increase in the number of volunteers. For many years park management set a goal of increasing volunteer numbers and established this goal as a performance metric in supervisory performance plans. Today the park has more than 1,480 volunteers who are supervised directly by NPS employees. These volunteers range from those who support the park once or twice a year to those who volunteer many hundreds of hours annually.

Volunteer management functions for NPS staff at CHOH are, as in many parks, one of several elements in their performance and work plan or collateral duties. Also, as in many parks, the volunteer program is run and supervised by the Interpretation, Education, and Volunteers Division (IEV), this supervisory responsibility includes volunteer work that is performed for other divisions.

The park volunteer coordinator has produced a cost analysis of staff time as it relates to NPS staff supervision of volunteers. The analysis has been presented to park management. Some of the recommendations in the analysis are to reduce supervisory span of control, review program SOPs, and explore opportunities with partners that could oversee some of the programs.

Areas of Strength:

- Many volunteers expressed appreciation for the work of NPS staff who manage the VIP program, as well as for park leadership. These volunteers find the staff to be supportive of volunteer efforts; responsive to needs; prompt in addressing concerns and questions; and well-organized in their management of tasks like time reporting, volunteer recognition, and meeting VIP uniform requirements.

- Many respondents expressed awareness of the importance of their work to the park, know that they are an important part of the workforce, and feel valued in that sense.
- Members of certain volunteer programs consider themselves well-trained for the work they do.
- Currently, a resource management staff member oversees the work being done by the non-native plant removal crew, which provides supervision of the work being directed by the division responsible for the work rather than the volunteer division.

Areas for Improvement:

- Both park staff and volunteers feel it would be beneficial if they had more interaction with each other.
- Some volunteers feel that the park interpretive division, which oversees the volunteer program, cannot provide adequate attention to, resources for, and subject-matter expertise in the work volunteers are performing. Some examples:
 - There are challenges for the volunteer coordinator in the Great Falls area of the Palisades District as a result of the rise in visitation and volunteer growth. This increase has affected the span of control and has created a misalignment with the assigned position description. More than 600 volunteers, approximately 18% of the volunteer workforce, serve in this area. The VIP coordinator provides support for the majority of these volunteers, accounting for 25,659 hours of volunteer work. Volunteer coordination at Palisades District is considered a collateral duty for the position at Great Falls, which means it should take only 20% of their time. Because of the number of volunteers and their needs, it is taking more than 80% of the coordinator's time to manage volunteers.
 - At the park's headquarters in Hagerstown, MD, the volunteer program manager is responsible for overseeing the entire VIP program. Some of these responsibilities are communicating with and providing guidance to the entire volunteer staff, supervising a portion of the volunteers directly, supervising volunteer leads, and coordinating with NPS volunteer supervisors in each district. Though the volunteer coordinator does not supervise the volunteers for the C&O Canal Trust, they do coordinate with the Trust on large group projects that are performed throughout the park. These one-day projects engaged nearly 2,200 volunteers in 2017.

The Team Recommends:

- Focus on volunteer programs that support the park's strategic plan and meet key visitor needs.
- Create clear chains of command and communicate them to volunteers.

- The topic of chain of command could be discussed at volunteer training and posted in a common area for reference.
- It should be clear who volunteers should approach with issues or questions.
- The information provided to volunteers should include the organizational structure of the park.
- Changes in NPS staff should be clearly communicated to all volunteers.
- Assign volunteer groups to divisions that are relevant to their work. Other volunteer groups such as Potomac Appalachian Trail Club and Boat Repair could be under the Maintenance Division.

Communication and Recognition

Key Policies/Guidance:

DO-7, § 16.1: All VIPs should be recognized for their service in an appropriate and timely manner.

RM-7, § 15.A VIP’s “reward” comes in the form of a sense of accomplishment and participation. VIPs take pride in their association with the NPS. A successful volunteer supervisor knows this and keeps morale and productivity high by making each volunteer feel wanted and part of the working team, acknowledging his/her work and how it helps the service achieve its goals, providing them with a visible means of identifying themselves with the NPS, and giving them special recognition and awards.

Observations:

VIPs recognize, but lament, the daunting administrative and office-based responsibilities of NPS staff, which keeps them from spending more time in the field. This trend is seen as contributing to some undesirable changes to the work environment. Specifically, some volunteers expressed that they miss having casual interactions with NPS employees that used to take place between staff and VIPs, and expressed a desire to recreate that experience. Half of the volunteers that responded to the survey felt that the park was responsive to their needs and half felt the park was not responsive.

Year-round volunteers comprise 38% of the volunteer workforce, and 62% of the volunteers work for one event one-time or work on one project and then leave. Currently, the VIP Coordinator meets annually with the year-round volunteers and shares volunteer updates to groups such as Trails & Rails, Cumberland Bike Patrol, Lockhouse 75 Docents, Hancock Visitor Center, Williamsport Visitor Center, Williamsport Bike Patrol, Great Falls Visitor Center, Billy Goat Trail Stewards, and Great Falls Bike Loaner Program. The Coordinator also has quarterly meetings with park staff who supervise the volunteer leads (who are year-

round volunteers) to addresses concerns and share updates. There is also an annual awards dinner that all year-round volunteers are invited to attend.

Areas of Strength:

- Volunteers appreciate that the NPS VIP program managers have a system to recognize the work of volunteers and celebrate accomplishments. Survey respondents and interviewees expressed gratitude for the letters, awards, and volunteer appreciation events conducted by NPS.

Areas for Improvement:

- Volunteers perceive a diminished presence of NPS staff in the field and lack of participation in programs run by volunteers. Some participants in the assessment process observed: infrequent communications from NPS staff; failure to respond (or slow response) to emails and phone calls; standoffish personal interactions and, on some occasions, a failure to express interest in and acknowledge the good work of volunteers.
- Both staff and volunteers express disappointment that there are few opportunities to meet together; jointly participate in programs; to exchange information about conditions of trails or other park resources; and provide sufficient staff oversight for VIP-led initiatives.
- Park staff need to communicate the priorities of park leadership, changes in program direction, information about VIP policies, and park protocols as well as basic operational information.
- Specific area of concern:
 - Volunteers have expressed that they are not aware of the other duties that NPS staff are responsible for accomplishing beyond the work they do with the volunteers. Park staff need to provide information to the volunteers about their other duties.
 - If volunteers have issues or questions, they sometimes do not know who to contact.
 - A consequence of contacting someone outside of their chain of command, or the wrong NPS staffer for the topic, is that the communication goes unanswered.
 - Volunteers are uncertain about who is “in charge,” whether a decision is final, and whether compliance with any particular decision is mandatory.
 - Some volunteers do things that they think should be done and sometimes resist the input from NPS staff because the policies and the chain of command is not clear.
 - VIPs perceive a lack of action or decision; conflicting work assignments; inability of staff to make decisions on-site and having to wait to enact what

are perceived as relatively minor changes in the field while awaiting approval from an unknown entity at headquarters or another division.

- As NPS staff depart for other jobs or detail assignments, and as workloads and portfolios are modified to address changing needs, volunteers are often left wondering about the change and what it means to them.

The Team Recommends:

- Develop a plan and SOPs for each type of volunteer position, so when roles change both the new supervisor and the volunteer will be able to refer to them.
- Develop a strategy for communication between park staff and volunteers that ensures timely information exchange and responses.
- Schedule an annual check-in with volunteers to revisit the position description attached to the OF301a. This is an opportunity to not only ensure accurate information on behalf of both the volunteers and the park, but also to check in with volunteers to receive input from them, and adjust the roles and responsibilities in the position description if needed.
- Inform the volunteers that the supervisor listed on the OF301a is the direct point of contact to whom the volunteer should report. In addition to their immediate supervisor listed on the OF301a, volunteers should be made aware of their chain of command beyond their listed supervisor.
- Review and update volunteers' OF301a as NPS staff change/leave positions. Once the new NPS volunteer supervisor is in place there is an opportunity for volunteer/volunteer group to meet the NPS staff member and review duties and responsibilities together.
- Send periodic emails to all volunteers (not just volunteer leads) with info and updates about the NPS, the park, and the VIP program.
- Expand opportunities for park staff to engage and interact with volunteers and the projects that they support.
- Hold annual meetings for all the volunteers in each of the three sections of the park. Training also presents an excellent opportunity to share and update volunteers on the current chain of command and organizational structure of the park.
- Seek affirmative interactions with volunteers. Whether this means initiating conversation or offering a brief word of grateful acknowledgement.
- Provide as much transparency and information as possible, updated with as much frequency as required, so that volunteers feel that they are part of a team and are not separate from or less valued than the park staff.
- Explain park management processes and policies.
- Execute joint work projects so more staff and volunteers can get to know each other better, facilitating future communication and widening professional/social networks.
- Commit to return calls and emails within a set period of time (e.g. 2 business days).

- Encourage CHOH volunteer manager staff to actively coordinate and communicate with each other about their training, funding and program updates.

Job Descriptions

Key Policies/Guidance:

<p>DO-7, § 4: A VIP’s completed Optional Form 301a (OF301a) must include an accurate job description and designate a supervisor. This information may be included on the form or in an attachment</p>
<p>DO-7, § 3.6: The Park VIP Program Manager’s duties will include... (3) providing guidance and assistance to park staff supervising VIPs; (4) leading/mentoring volunteers; and (6) such other duties as are specified in RM-7.</p>
<p>DO-7, § 4: A VIP’s completed Optional Form 301a (OF301a) must include an accurate job description and designate a supervisor. This information may be included on the form or in an attachment.</p>
<p>RM-7, § 3: ... Volunteer performance reviews and annual written evaluations of volunteers’ work within the park, division, etc. are encouraged to ensure high-quality volunteer performance and experience.</p>

Observations:

The park has hundreds of dedicated volunteers who provide thousands of hours of service annually. Some of these volunteers have served for several decades. The volunteer workforce is generally an adult cadre with many years of work and life experience. They have been responsible for furthering volunteer programs as volunteer leads for the park. They are passionate about the park and wish to be involved in decisions affecting the programs they support.

Management has implemented changes to abide by the revisions to DO-7 and RM-7 policies. Some of these changes were implemented without educating all volunteers about the new policies and the importance of following these policy changes. This lack of understanding has affected the working relationship between park staff and some volunteers. Knowledge and familiarity of the NPS volunteer program policies and standards in both DO/RM-7 are necessary for both NPS staff and volunteers. Lack of knowledge has led to varying expectations held by NPS staff and volunteers and, at times, tension between groups who may have heard different information.

Areas of Strength:

- Within this dedicated and accomplished volunteer corps, many are happy with their duties in the park and their relationship with NPS staff. The variety of position types and duties, as well as options for both short- and long-term commitments are seen as a strength.
- Many respondents to the survey acknowledged that the program benefits from a highly diverse local population possessing relevant experience, enthusiasm, advanced skills, and leadership qualities.

The Team Recommends:

- Outline and agree to the full scope of the volunteer duties in an attachment to the OF301a. Include all relevant job hazard analysis/job safety analysis documentation, and all required training. Explain duties, immediate supervisor, and chain of command in explicit detail so each volunteer is given full opportunity to voice any questions or concerns if they are not qualified, and/or do not feel comfortable/willing to perform the duties detailed.
- Conduct performance reviews as an opportunity for volunteers to provide feedback to their supervisors.
- Schedule regular meetings for volunteer leads and park volunteer coordinators to discuss areas of interest. To the extent practicable, consider additional forums in which ideas may be exchanged and the input of the volunteers can be received.
- Foster a collaborative management approach where appropriate. The hands-on experiences of the volunteers, who have administered programs in the field for years, is a valuable resource to park staff. Both NPS staff and volunteers could provide input into the scope and sequence of the actions required to implement a program, as well as to define roles and responsibilities of the collaborators.
- Assign appropriate CHOH staff (depending on the job description of the volunteer group) from other park divisions to help manage volunteers to provide a more reasonable and supportive span of control, enabling more direct lines of communication with a larger number of park staff.
- Assign function-specific CHOH staff as liaisons to coordinate with each volunteer program. The liaisons could assist with:
 - Recruitment (or limiting recruitment, as needed),
 - Membership contact list development and maintenance, and
 - Meetings and training (including annual work planning and needs assessment).
- Create a protocol or method for park volunteers to communicate issues or events that have occurred in the field, safety or operational needs, and concerns visitors have raised, among other things.

Training

Key Policies/Guidance:

RM-7, § 3: Ongoing support and resources should include training, (on-the-job) coaching, informal appreciation, materials, and information to support volunteers' efforts.

DO-7, § 8.1: The NPS must provide adequate training and supervision for individuals and/or groups enrolled as Volunteers-In-Parks.

DO-7, § 8.4: A VIP is not required to perform work for which he/she is not qualified, for which he/she has not been adequately trained, which he/she does not feel comfortable doing, which he/she does not willingly agree to do, or which is not part of the written job description.

DO-7, § 15.2: Anyone supervising VIPs is eligible for supervisory training. Such training is mandatory for those supervising VIPs (any number) whose combined hours of service equal or exceed 6,261 hours per year (i.e., those of three full time employees).

RM-7, § 14 - Each VIP will undergo appropriate orientation procedures and job training. VIPs should be provided with all the tools necessary to perform the job duties outlined in the agreement form. These tools can include maps and brochures of the park areas in which they will be working, park specific safety rules and procedures, and any personal protective equipment and training required by NPS policy and Occupational Safety and Health Administration (OSHA) regulations.

Observations:

Areas of Strength:

- Volunteer training opportunities in the park received general praise from many participants.
- Members of certain volunteer programs consider themselves well-trained for the work they do. They noted, in particular, the peer-to-peer training provided by volunteers possessing significant outdoor, first aid, customer service, and management skills.
- New volunteers valued the introductory and on-boarding training, which provided basic information.

Areas for Improvement:

- While on-boarding and training programs are in place, the offerings are limited, resulting in gaps in the knowledge of many volunteers on park priorities, policies, laws, and other foundational information.
- Some volunteers would like to maintain a minimum set of standard training requirements for baseline competencies, followed by ongoing “refreshers” as well as increasingly layered and advanced skill development. In some programs, volunteers have expressed a need for specialized training for the work that they do in the park.

The Team Recommends:

- Develop clear guidelines and training materials for both volunteer leads and park staff to best prepare them for their roles in the park.
- Present only training courses that have been approved by park staff, so that policies and guidelines are addressed.
- Any peer-to-peer training should only be done by volunteers that are certified that particular area, such as first aid.
- Increase, as possible, the participation of NPS staff in volunteer training programs. This would promote better communication, collaboration, and add value.
 - Implement group- or topic-specific training designed to teach the skills required for individual VIP programs. Experienced volunteers could play an active role in developing and delivering such training but, to the maximum extent practicable, NPS staff should engage in the process of developing content and presenting and attending the course offerings.
- Implement standard and regularly-scheduled training for new volunteers to address general CHOH history and operational basics, as well as provide skills specific to the volunteer’s position. A centrally managed training program could include courses designed to achieve broad learning objectives related to “CHOH 101,” as well as major NPS policy, operational and safety requirements.
- Update the CHOH volunteer handbook (2010), to reflect current operations at the park. Wide distribution of the document, both electronically and hard-copy, would ensure that both staff and volunteers have a ready reference.

Safety and Oversight

Key Policies/Guidance:

54 U.S. Code § 102301: “...the services of individuals without compensation as volunteers for or in aid of interpretive functions or other visitor services or activities in and related to System units and related areas. In accepting those services, the Secretary shall

not permit the use of volunteers in hazardous duty or law enforcement work or in policymaking processes, or to displace any employee...”

DO-50C ([Public Risk Management Program](#)), § 3.1: Through **Emergency Medical Services**, the National Park Service will make reasonable efforts, within the limits of available resources, to provide appropriate response for persons who become ill or injured. An emergency medical services program will be maintained to provide transportation of the sick and injured, and emergency pre-hospital care, which may range from minor first aid to advanced life support in various environmental settings. (Reference: DO-51 and RM-51.)

DO-7, § 8.1: The NPS must provide adequate training and supervision for individuals and/or groups enrolled as Volunteers-In-Parks. Ultimate responsibility for this rests with the appropriate NPS management official, i.e., Superintendent or Program Manager.

As outlined by the Volunteers in the Parks Act of 1969, volunteers may perform any function aside from commissioned law enforcement and policy making, (See 54 U.S. Code § 102301, above), if the work outlined in their position description and volunteer services agreement, a job hazard analysis is conducted, and they receive proper training (See RM-7, § 8; DO-7, § 8.1, and DO-7, § 8.4 below.)

NPS has responsibilities to address EMS or other visitor safety needs (See DO-50C, below) and may use volunteers to assist with this, provided their roles are clearly outlined and protocols and training are developed.

Ultimately, as noted in Issue 1, the responsibility for ensuring adequate training and supervision is provided for those enrolled as volunteers rests with the superintendent (See DO-7, § 8.1). If, for any reason, the superintendent has determined the park is unable to provide adequate training or supervision for individuals and/or groups enrolled as EMS and/or safety volunteers, the superintendent is responsible for decisions regarding the restructuring, creation or elimination of the volunteer program(s).

RM-7, § 8: Any use of VIPs in jobs considered to be hazardous for federal pay purposes must be evaluated on a case-by-case basis and should take the VIP’s training and qualifications to perform such work into account. Use a job hazard analysis/job safety analysis for any questionable work assignments. Supervisors should consult with their regional safety officer if they question the appropriateness of a VIP assignment for a specific duty.

DO-7, § 8.4: A VIP is not required to perform work for which he/she is not qualified, for which he/she has not been adequately trained, which he/she does not feel comfortable

doing, which he/she does not willingly agree to do, or which is not part of the written job description [section of Optional Form 301a].
DO-21 (Donations and Philanthropic Partnerships), § 4.7: ...All non-monetary donations accepted by a park or program must be accounted for under the same standards and procedures used to account for other similar government property (see Director’s Order #44: Personal Property Management).
DO-50C (Public Risk Management Program), § 1.1 Furthermore, injury prevention is a shared responsibility between the park staff, park partners, and park visitors. On the one hand, it is the responsibility of park superintendents and their partners (e.g., concessioners, contractors, and permittees) to make a reasonable effort to assess risks in their respective parks, to eliminate or mitigate the risks when reasonable and appropriate, and/or to communicate risks to the public within the limits of available resources as determined by park managers.
DO-44 (Personal Property Management), § 3.7: Managers at all levels will be held accountable for all property under their control. They must ensure that all employees are aware of their responsibilities and are held accountable for the proper use and care of Government-owned or leased property in their possession. See Personal Property Management Handbook #44
Park Guidance, Billy Goat Trail Stewards Handbook (see excerpt below)
Park Guidance, Bike Patrol Program (see excerpt below)

Other Park Guidance:

Billy Goat Trail Stewards Handbook: “Stewards educate hikers on the ecology of the island and the need for Leave No Trace ethics. They also remind visitors that pets are banned on the island that the hike is strenuous, and they report emergencies to park staff. Stewards do not enforce park regulations and are not expected to do so. They are encouraged to avoid conflicts with visitors and may choose not to remind visitors of laws on the trails, but are encouraged to report violations to the park.”

The position description for the BGTS includes:

- Providing information and informal interpretation about the park’s history and its natural resources to visitors.
- Providing efficient and courteous service to park visitors.
- Addressing minor regulatory issues by informing visitors of park regulations. Volunteers do not enforce park regulations.
- Responding to basic first-aid and first-aid emergencies.
- Providing Leave No Trace (LNT) education.

- Leading LNT educational hikes for organized groups
- Relaying visitor comments and concerns to park staff.
- Alerting park staff to potential problems and hazards on the towpath.
- Assisting Law Enforcement personnel only at the request of said personnel.

Park Guidance, Bike Patrol Program: The Bike Patrol position description states: “Bike Patrol volunteers serve as public representatives of the NPS [and] the C&O Canal by riding on the towpath, preferably in pairs. Volunteers follow the park’s policies and guidelines and understand its organizational structure. They greet and welcome visitors using the towpath, and providing them with information on the park’s history, resources, regulations and safety in the park. Volunteers also alert staff to potential problems and safety hazards on the towpath, assist with special events and programming; relay visitor comments and concerns to park staff, and provide basic first aid and bike maintenance to visitors when needed.”

Observations:

Currently, there are three volunteer groups providing a limited range of traditional visitor safety-related services to the public. These are the Billy Goat Trail Stewards (BGTS), Bike Patrol, Emergency Medical Services (EMS) Patrol and First Aid Training.

Two programs (BGTS and Bike Patrol) and their lead volunteers report to the park volunteer coordinator for the Palisades District, who works in the Interpretation, Education and Volunteers Division. The purpose of the BGTS and Bike Patrol programs is to assist visitors with information about the trails, provide limited bicycle repairs, educate visitors on safety and resource protection, and notify park staff on maintenance and public use management issues (See Key Policies/Guidance section below for more on the purposes and position descriptions). They provide basic first aid and serve as the initial point of contact for first-aid emergencies, reporting such emergencies to park staff. They may coordinate with local public safety agencies on incidents and notify law enforcement of significant violations.

Because there are no commissioned Visitor and Resource Protection (VRP) staff assigned to the Great Falls area there is limited interaction between the VRP Division and the volunteers. The VRP staff uphold mandates that occupy the majority of their time; this limits their ability to oversee a volunteer program.

A number of years ago, the park introduced a bike loaner program to the Great Falls area, and an existing volunteer was asked to help lead the program. Over the years the program grew to 125 donated bicycles, which are loaned out to the public at no cost. When new Interpretation, Education and Volunteers Division staff came on board, they realized that the program had not been operating within NPS policies. Currently the park does not allow the volunteers to accept any more bike donations.

Areas of Strength:

- The primary VIP program related to visitor safety/protection is the Emergency Medical Service (EMS) Patrol at Great Falls, which currently has one volunteer. This VIP is coordinated by the CHOH Fee Supervisor, who is based in the Visitor and Resource Protection (VRP) Division. This VIP is a trained Emergency Medical Technician (EMT) and is trained in Search and Rescue (SAR). She is part of the National Interagency Fire Center (NIFC) and maintains an NPS EMS credential. This VIP reports incidents to the Chief Ranger, and then the VRP division should enter the pertinent data into the U.S. Department of the Interior law enforcement Incident Management Analysis and Reporting System (IMARS).
- The First Aid Training program operates in both the Great Falls and Williamsport districts of the park. At Great Falls, a certified volunteer coordinates first aid and cardiopulmonary resuscitation (CPR) training once a month through the American Heart Association for both NPS staff and volunteers. At Williamsport, the park administers a first aid training center, credentialed by American Safety and Health Institute. The park is responsible for processing payments, issuing first aid/CPR cards, and scheduling and other administrative tasks for the center.
- Some of the survey participants felt that safety is the number one park priority and that issues are routinely covered and are always in the forefront of park supervision.
- The bike loaner program is popular and it is readily used by park visitors.

Areas for Improvement:

- Some of the survey participants felt that Job Hazard Analysis (JHA) documents should be developed for all volunteer job types. Either the park only has them for some of the jobs or the volunteers are not aware of the JHAs for their jobs.
- Improve training and SOPs for volunteers in setting up signage to inform visitors when there are high winds or high water.
- There is concern that some volunteer positions require them to work alone in remote areas and buildings with no other in-person personnel support from the park or other volunteers when they are on duty.
- In February 2018, in a separate assessment from the one reported here, National Capital Region staff conducted an Internal Control Review for CHOH. Evaluators noted that volunteers in the BGTS and Bike Patrol programs had been contributing to visitor safety through first aid, etc. Evaluators found that the volunteers were not capturing all required incident information, as they often respond to incidents without park staff involvement. In many cases this information was not entered into IMARS, but was typically captured by the park safety officer post-incident, via weekly reports from the VIP programs.
- Some survey respondents and interviewees indicated that, over time, some VIPs from the BGTS and Bike Patrol programs have expanded their approach to visitor safety

- and resource protection in a manner beyond the original scope of the programs or their position descriptions. Some VIPs see the programs as addressing a key need of visitor safety and resource protection, and wish to see program volunteers better trained in first aid and preventative search and rescue (PSAR) and better equipped with radios and equipment. They also see a better alignment of these programs under the VRP division, rather than the Interpretation, Education and Volunteer Division. Other respondents indicated that realigning these programs under VRP and providing additional oversight for them would not be possible with current staffing and that the emphasis should be on refocusing the programs toward their original purposes.
- Because of the number of volunteers and the length of the towpath it is hard to track the interactions that the volunteers have with visitors. Some of these interactions are beyond the duties that the volunteers should be performing.
 - There are issues with cash donations, sales of bicycles, and property management. All bicycles donated to the bike loaner program need to be entered into the NPS property system and can only be disposed of under property regulations and guidelines. Monetary donations to support any element of this program, including for supplies or other elements to support work of volunteers, also must be accounted for and managed in accordance with applicable law and policy.

The Team Recommends:

- Review annually and discuss the parameters of the volunteer PDs. The majority of the positions were interpretive in nature and provide information, visitor safety tips, and interpretation. Basic first aid is a collateral duty as it is for permanent interpretive positions; it is not meant to be a primary duty. If the park needs services such as SAR, it should partner with a local group that provides their own equipment and are well trained for these duties.
- Use Operational Leadership tools and use the Operational Risk Management Analysis (ORMA) to assess some of the volunteer duties that may put volunteers at risk. The ORMA model is a cyclical planning process, meaning that changes to the situation or categories, such as the operating environment, require re-evaluation. The purpose of planning with ORMA is to properly determine risk and to mitigate that risk in accordance with the mission.
- Ensure that there are JHAs for all volunteer positions and that they are aware of the JHAs.
- Ensure that accidents are properly reported and meet policy requirements
- Ensure that VIPs' work matches the position descriptions
- Update SAR and EMS plans to reflect volunteer contributions and standard operating practices for volunteers.
- Ensure that there is proper communication and coordination within the park and with local responding public safety agencies and SOPs.

- Provide on-site supervision and training to the volunteers as necessary.
- Use Operational Leadership tools and the Operational Risk Management Analysis (ORMA) to assess the volunteer duties that could be risky.
- Ensure that the Bike Loaner program and associated donations are being administered in accordance with law, regulation, and NPS policy.
- Evaluate the appropriate management structure of the Bike Loaner Program including but not limited to the two ideas noted below:
 - Option one: Remain an NPS program run by volunteers. Under this option, the park would need to ensure that no donations are being solicited and unsolicited cash donations go directly into a designated donation box firmly secured to a structure that can only be accessed by key NPS staff following all protocols for cash management. The funds can be reserved for use by the program following all acquisition requirements.
 - A new standard operating procedure (SOP) should be put in place to bring the program into compliance with NPS Director's Order and Reference Manual 44 and NPS Director's Order 21.
 - All bicycles in the program are the property of the NPS, should be marked as such, and formally documented as non-expendable Bureau managed property. Disposal must be in compliance with DOI/NPS Property Management guidelines. Accepted methods of disposal include surveying the property or donating it to educational or non-profit organizations. If one of these options is selected, the park staff would need to thoroughly communicate to the volunteers the reasons and processes for the change and work with volunteers to develop the SOP, which would be signed by the superintendent.
 - Option two: Use a different authority to provide this service. The park could pursue a concessions contract, CUA, or other similar commercial use authority. The park could also consider exploring authorizing the program under a special park use permit, partnership agreement or other agreement structure with a non-profit organization. In this scenario all bicycles and donations would go directly to the non-profit entity.

Follow-up Actions

The park superintendent should respond to this report in writing no later than 90 days after receipt. In the response, the superintendent should describe their intent to incorporate recommendations into its volunteer program management with specific dates when certain milestones will be completed.