

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT



CONTINUING PROFESSIONAL TRAINING
AUDIT
EAST PATROL DIVISION
No. 2017-7-A

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SHERIFF

September 19, 2017

**LOS ANGELES COUNTY SHERIFF'S DEPARTMENT
Audit and Accountability Bureau**

**CONTINUING PROFESSIONAL TRAINING AUDIT –
EAST PATROL DIVISION
Project No. 2017-7-A
AUDIT REPORT**

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Continuing Professional Training Audit - East Patrol Division and Training Bureau under the authority of the Sheriff of Los Angeles County. The audit was performed to determine how the Los Angeles County Sheriff's Department (Department), East Patrol Division (EPD)¹ complied with the biennial training standards required by the California Commission on Peace Officer Standards and Training (POST) and by the Department's Manual of Policy and Procedures (MPP).

The AAB conducted this performance audit under the guidance of Generally Accepted Government Auditing Standards.² The AAB has determined the evidence obtained was sufficient and appropriate to provide a reasonable basis for the findings and conclusions based on the audit objectives.

BACKGROUND

The California Commission on Peace Officer Standards and Training was established in 1959 by the California Legislature to set minimum selection and training requirements to enhance professionalism and raise the level of competence of California law enforcement. Under current POST requirements, all peace officers (other than Level III Reserve Peace Officers³), and public safety dispatcher personnel must complete 24 hours of Continuing Professional Training (CPT) for each two-year cycle as defined by POST. For those peace officers who are below middle management⁵, assigned to patrol, traffic, or investigation, and routinely effect the physical arrest of criminal

¹ The East Patrol Division includes: Altadena, Crescenta Valley, Industry, San Dimas, Temple, and Walnut Sheriff Stations.

² United States Government Accountability Office – By the Comptroller General of the United States, December 2011, Government Auditing Standards 2011 Revision.

³ Commission of Peace Officer Standards and Training, Reserve Peace Officer Program (RPOP), <https://www.post.ca.gov/reserve-peace-officer-program-rpop.aspx>, Level III Penal Code sections 830.6(a)(1) and 832.6(a)(3), Level III reserve officers may perform specified limited support duties, and other duties that are not likely to result in physical arrests, while supervised in the accessible vicinity by a Level I reserve officer or a full-time regular officer. Additionally, Level III reserve officers may transport prisoners without immediate supervision.

⁵ Commission of Peace Officer Standards and Training, Section B – Regulations, Regulation 1001. Definitions, <https://www.post.ca.gov/regulation-1001-definitions.aspx>, "Middle Management Position" is a management peace officer position between the first-level supervisory position and the department head position, for which commensurate pay is authorized, and is responsible principally for management and/or command duties. The middle management position is most commonly the rank of lieutenant or higher.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION

Project No. 2017-7-A

suspects, 14 of those 24 hours must be specific Perishable Skills Program and Communication CPT (PSP) training. Peace officers working 90 percent of their time on administrative duties and Reserve Deputies are exempted from PSP, but must complete CPT.

The Department adopted these standards as policy in the Department's MPP. Within the EPD, Lieutenants and below are considered to be "below middle management," and Law Enforcement Technicians (LET) are considered to be "public safety dispatcher personnel." The Department's Training Bureau is responsible for monitoring and tracking of the CPT.

PRIOR AUDIT

This was the first Continuing Professional Training Audit conducted by the AAB.

METHODOLOGY

Scope

The audit included examination of all available records from the POST Electronic Data Interchange (EDI) system⁷, the Los Angeles County Learning Net, Learning Management System (LMS)⁸, and each employee's training files.

The applicable policy sections were used to determine compliance with POST and the Department's MPP. The EPD was selected for this audit, which is comprised of EPD Headquarters and six patrol stations: Altadena, Crescenta Valley, Industry, San Dimas, Temple, and Walnut. A review of the Training Bureau's recording of CPT in EDI and LMS was also conducted.

This audit encompassed three main objectives:

- **POST Mandated Training: Recurring Training** - Determine if the Department's EPD personnel completed their CPT and PSP training within the two-year cycle in compliance with POST regulations and the Department's MPP. Determine if the Training Bureau recorded CPT into EDI and LMS.
- **Unit Commander Responsibilities: Training Records** - Determine if the personal training files are maintained as required by the Department's MPP.

⁷ POST Electronic Data Interchange (EDI) system allows POST participating agencies and course presenters to submit and process information to POST via a secured website. The system also provides users with immediate access to various reports including Course Certification Access.

⁸ The Los Angeles County Learning Net, Learning Management System (LMS) provides online learning courses to employees of Los Angeles County.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION

Project No. 2017-7-A

- Inspection Process - Determine if the station training programs were inspected by Division command personnel at least once per year.

Applicable Regulations and Guidelines

Peace Officer Standards and Training Administrative Manual, Section B: Regulation 1005:

- Section (d)(1), Continuing Professional Training (Required)
- Section (d)(4), Perishable Skills/Communications Requirement for CPT
- Section (d)(4)(A), Perishable Skills Training
- Section (d)(4)(B), Communications Training

Department's MPP:

- MPP §3-02/080.01: Training Requirements for Sworn Personnel
- MPP §3-02/080.02: Training Requirements for Professional Staff

Audit Time Period

The time period for this audit was from January 1, 2015, through December 31, 2016.

Audit Population

Auditors identified the population utilizing the employee rosters provided by EPD. The rosters reflected personnel who worked up to the end of the two-year cycle (December 31, 2016) in the peace officer and/or public safety dispatcher capacity. The auditors identified 822 personnel who were subject to completing CPT requirements and randomly selected 113 personnel for review.⁹ The sample was stratified to include peace officers of all levels (Chief, Commander, Captain, Lieutenant, Sergeant, Deputy, and Reserve Deputy) and public safety dispatcher personnel (Law Enforcement Technician). Level III Reserves were not assigned to EPD.

SUMMARY OF AUDIT FINDINGS

The management and staff at EPD Headquarters, each of the audited patrol stations, and the Training Bureau were accommodating and cooperative in providing the necessary information and in validating the findings.

⁹ Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid sample was identified.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

The EPD achieved varied results for the objectives. The results of the audit are summarized in Table No. 1.

Table No. 1: Summary of Audit Findings

Objective No.	Audit Objective	Met the standard
1	POST MANDATED TRAINING: RECURRING TRAINING	
1(a)	CONTINUING PROFESSIONAL TRAINING - SWORN AND PROFESSIONAL STAFF	
	<i>Determine if mandated personnel completed a minimum of 24 hours CPT certified course(s)</i>	61%
1(b)	PERISHABLE SKILLS PROGRAM AND COMMUNICATIONS	
	<i>Determine if sworn personnel who were required to complete PSP training completed a minimum of 14 hours of PSP training</i>	46%
2	UNIT COMMANDER RESPONSIBILITIES: TRAINING RECORDS	
2(a)	PERSONAL TRAINING FILES	
	<i>Determine if the unit maintained CPT training records for all mandated staff</i>	0%
2(b)	PERSONAL INFORMATION	
	<i>Determine if training records were maintained separately from Personal Information</i>	74%
3	INSPECTION PROCESS	
	<i>Determine if the unit training programs were inspected by the Division's command personnel at least once per year</i>	67%

Objective No. 1 – POST Mandated Training: Recurring Training

Objective No. 1(a) – Continuing Professional Training – Sworn and Professional Staff

Criteria

California Peace Officer Standards and Training Administrative Manual, Section B, Regulation 1005, Minimum Standards for Training, Section (d)(1), Continuing Professional Training (Required) states:

...Every peace officer (other than a Level III Reserve Peace Officer), every Public Safety Dispatcher, and every Public Safety Dispatch Supervisor shall satisfactorily complete the CPT requirement of 24 or more hours of POST-qualifying training during every two-year CPT cycle, based on the statewide CPT Anniversary Date as specified in subsection 1005(d)(2)....

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION Project No. 2017-7-A

Manual of Policy and Procedures, Section 3-02/080.01, Training Requirements for Sworn Personnel (revised October 15, 2015) states:

...Continued Professional Training (CPT) – All deputies, sergeants, and lieutenants who are assigned to patrol, traffic, or investigation who routinely effect the physical arrest of criminal suspects are required to receive the P.O.S.T. specified hours of CPT instruction once every two years....

...Lieutenants and those sworn employees (i.e., operations sergeant, station court deputy, et cetera) working 90% administrative duties are required to meet the CPT requirement by completing 24 hours of any P.O.S.T. certified course(s)....

Manual of Policy and Procedures, Section 3-02/080.02, Training Requirements for Professional Staff (revised October 15, 2015) states:

Law Enforcement Technician ... POST requires 24 hours of Continuing Professional Training (CPT), scheduled by their unit of assignment, every two years for all LET's and Public Response Dispatchers....

Audit Procedures

Auditors reviewed EDI transcripts, LMS transcripts, and personal training files to determine if all mandated personnel completed a minimum of 24 hours of CPT certified courses within the two-year period specified. The POST requirements mandate all sworn personnel and dispatcher personnel receive CPT training, however Department; however, policy is unclear as to whether sworn personnel above the rank of Lieutenant should complete CPT training. Since POST provides governance over peace officer standards, auditors used the POST CPT requirements which required training for all peace officers and public safety dispatcher personnel to evaluate this objective.

Findings

For this objective, 69 of the 113 (61%) peace officers and public safety dispatcher personnel met the standard. Forty-four personnel did not meet the standard because they did not complete 24 hours of CPT.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

Table No. 2: Summary of Audit Findings, Objective No. 1(a)

Continuing Professional Training – Sworn and Professional Staff		
Location	Met the Standard	In Compliance
EPD Headquarters	1 of 3	33%
Altadena Station	11 of 12	92%
Crescenta Valley Station	12 of 18	67%
Industry Station	9 of 21	43%
San Dimas Station	4 of 11	36%
Temple Station	18 of 30	60%
Walnut Station	14 of 18	78%

Objective No. 1(b) – Perishable Skills Program and Communications

Criteria

California Peace Officer Standards and Training Administrative Manual, Section B: Regulation 1005, Minimum Standards for Training, Section (d)(4), Perishable Skills/Communications Requirement for CPT (revised February 23, 2017) states:

Effective January 1, 2002, all peace officers (except reserve officers) below the middle management position and assigned to patrol, traffic, or investigation who routinely effect the physical arrest of criminal suspects are required to complete Perishable Skills and Communications training. In-lieu of completing the training, the requirement may be met by successfully passing a presenter-developed test that measures the approved training objectives.

California Peace Officer Standards and Training Administrative Manual, Section B: Regulation 1005, Minimum Standards for Training, Section (d)(4)(A), (revised February 23, 2017) states:

Perishable Skills training shall consist of a minimum of 12 hours in each two-year period. Of the total 12 hours required, a minimum of 4 hours of each of the three following topical areas shall be completed:

- *Arrest and Control*
- *Driver Training/Awareness or Driving Simulator*
- *Tactical Firearms or Force Options Simulator*

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION

Project No. 2017-7-A

California Peace Officer Standards and Training Administrative Manual, Section B: Regulation 1005, Minimum Standards for Training, Section (d)(4)(B), (revised February 23, 2017) states:

Communications training either tactical or interpersonal, shall consist of a minimum of 2 hours in each two-year period as specified in PAM Section D-2.

Manual of Policy and Procedures, Section 3-02/080.01, Training Requirements for Sworn Personnel, POST Mandated, Recurring Training (revised October 15, 2015) states:

Continued Professional Training (CPT) - All deputies, sergeants, and lieutenants who are assigned to patrol, traffic, or investigation who routinely effect the physical arrest of criminal suspects are required to receive the POST specified hours of CPT instruction once every two years. All sergeants and deputies are required to receive 14 of those hours in the “Perishable Skills” areas listed below:

- *Tactical Communications – 2 hours;*
- *Firearms – 4 hours;*
- *EVOC – 4 hours; and*
- *Arrest/Control – 4 hours.*

Audit Procedures

Auditors reviewed EDI transcripts, LMS transcripts, and personal training files to determine if all mandated personnel completed a minimum of 14 hours of PSP training. For this objective, 50 of the 113 mandated personnel were not required to complete PSP training due to their job assignments or rank in the Department. Therefore, auditors reviewed training records for 63 employees.

Findings

For this objective, 29 of 63 (46%) met the standard for PSP training. Thirty-four of the remaining personnel did not meet the standard, as auditors could not locate documentation demonstrating compliance with the PSP training standard.

**CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A**

Table No. 3: Summary of Audit Findings, Objective No. 1(b)

Perishable Skills Program and Communications		
Location	In Compliance	Met the Standard
EPD Headquarters	N/A*	N/A*
Altadena Station	6 of 7	86%
Crescenta Valley Station	1 of 5	20%
Industry Station	5 of 12	42%
San Dimas Station	2 of 8	25%
Temple Station	6 of 22	27%
Walnut Station	9 of 9	100%

*EPD Headquarters sworn employees work 90% on administrative duties and therefore, are not required to complete 14 hours of Perishable Skills Programs training.

Objective No. 2 – Unit Commander Responsibilities: Training Records

Objective No. 2(a) – Personal Training Files

Criteria

Manual of Policy and Procedures, Section 3-02/080.01, Training Requirements for Sworn Personnel, POST Mandated, Unit Commander Responsibilities, Training Records, Personal Training Files (revised October 15, 2015) states:

All units shall maintain training files for individual employees which shall at least contain the following documents:

- *Printout of all training the individual has received;*
- *Copies of P.O.S.T. certificates;*
- *Copies of training certificates; and*
- *Mandated tests.*

Audit Procedures

Auditors reviewed personal training files to determine if the unit maintained personal training files for individual employees and if the files contained all required documents. Three employees did not have a personal training file. Since there were no records to review, they were excluded from this objective. Therefore, auditors reviewed 110 personal training files.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

Findings

For this objective, none of the 110 (0%) had personal training files met the standard containing all required documents.

Objective No. 2(b) – Personal Information

Criteria

Manual of Policy and Procedures, Section 3-02/080.01, Training Requirements for Sworn Personnel , Unit Commander Responsibilities, Training Records, Class Files (revised October 15, 2015) states:

...No documentation that contains personal information such as social security number, date of birth, address, spouse's name, children's names, health/medical information, etc., shall be included in these files....

Audit Procedures

Auditors reviewed the personal training files selected to determine if the files contained personal information. Three employees did not have a personal training file. Since there were no records to review, they were excluded from this objective. Therefore, auditors reviewed 110 personal training files.

Findings

Eight-one of the 110 (74%) personal training files that did not include personal information and met the standard for this objective. The remaining 29 personal training files included personal information in their training files.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

Table No. 4: Summary of Audit Findings, Objective No. 2 (b)

Personal Information		
Location	In Compliance	Met the Standard
EPD Headquarters	0 of 2	0%
Altadena Station	6 of 12	50%
Crescenta Valley Station	12 of 18	67%
Industry Station	16 of 19	84%
San Dimas Station	8 of 11	73%
Temple Station	25 of 30	83%
Walnut Station	14 of 18	78%

Objective No. 3 – Inspection Process

Criteria

Manual of Policy and Procedures, Section 3-02/080.01, Training Requirements for Sworn Personnel, Inspection Process, (revised October 15, 2015) states:

Each unit shall have their training program inspected by the Division’s command personnel at least once a year. The specific nature of this inspection shall be at the discretion of the concerned Chief or Division Director. It shall include, at a minimum, a review of training records for compliance with training requirements...

Audit Procedures

Auditors reviewed EPD’s Command Inspection records to determine if the EPD’s station training programs were inspected by the Division’s command personnel at least once per year for each of the six stations. In order to be compliant with the policy, the station’s training program would have to be inspected once in each calendar year during the two-year audit time period.

Findings

Four of the six (67%) stations met the standard for this objective. Industry Station’s inspections for 2015 and 2016 were conducted in the subsequent year respectively; and Altadena Station’s inspection was not conducted in 2015; therefore, two stations did not meet the standard. In addition, auditors noted that EPD Headquarters sworn employees are required to complete CPT training. However, the Command Inspection

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION

Project No. 2017-7-A

did not include a review of EPD Headquarters sworn employees training records for compliance with training requirements.

OTHER RELATED MATTERS

Other related matters are pertinent issues discovered during the audit, but were not objectives that were measurable against POST or Department policies or procedures.

Department Policy Does Not Match POST Requirements

Manual of Policy and Procedures, Section 3-02/080.01 Training Requirements for Sworn Personnel, (revised October 15, 2015) states:

Continued Professional Training (CPT) – All deputies, sergeants, and lieutenants ... are required to receive the P.O.S.T. specified hours of CPT instruction...

...Lieutenants and those sworn employees (i.e., operations sergeant, station court deputy, et cetera) working 90% administrative duties are required to meet the CPT requirement by completing 24 hours of any P.O.S.T. certified course(s).

California Peace Officer Standards and Training Administrative Manual, Section B: Regulation 1005, Minimum Standards for Training, Section (d)(4) states:

Every peace officer (other than a Level III Reserve Peace Officer), every Public Safety Dispatcher, and every Public Safety Dispatcher Supervisor shall satisfactorily complete the CPT requirement of 24 or more hours of POST-qualifying training during every two-year CPT cycle...

The POST requirements mandate all sworn personnel and dispatcher personnel receive CPT training; however, Department policy is unclear as to whether sworn personnel above the rank of Lieutenant should complete CPT training.

Accuracy in Recording POST Courses in EDI and LMS

The tracking systems for all PSP and CPT certified courses taken by Department personnel are EDI and LMS. POST only requires CPT certified courses be entered into EDI. However, Training Bureau is responsible for entering completed attendance training rosters in both the EDI and LMS systems, which duplicates data entries and creates a potential for error. Auditors noted classes recorded in one system were not always recorded in the other system. In addition, classes were recorded in LMS by either the “registration date” or “successful date”. Auditors found that neither of these dates were the actual date of the class the employee attended. Furthermore, identical

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION

Project No. 2017-7-A

courses sometimes had different course titles. In some cases, the same course was identified as CPT certified and the other not identified as CPT certified in LMS.

Access to Training Tracking Systems

Station Training Staff are responsible for ensuring their personnel complete the required CPT training, but they have limited access to LMS and no access to the EDI system. Without access, they have difficulty in verifying the personnel assigned to the station have completed their training requirements.

Training Files – Personal Information

Auditors found that the files contained personal information as noted above. In addition, auditors noted the policy did not identify any notification process when personal information is known or believed to have been compromised. The Board of Supervisors' Policy, Section 3.041 – Protection of Records Containing Personal and Confidential Information, states that notification to the Office of County Investigations must be made when personal information is known or believed to have been disclosed to an unauthorized person.

Training Files – Internal Controls Regarding Retention

In reviewing the training files, auditors found that the files were voluminous and included repetitive or expired training records. The Department does not have a training records retention policy to remove obsolete training records.

Inconsistency with CPT Training Classification

The “Advanced Officer Course (FTC)” in EDI is referenced as “Patrol School.” The MPP Section 3-02/080.01 states, “Successful completion of Patrol School satisfies the CPT requirement.” However, LMS does not recognize this course as PSP certified. In addition, EDI does not recognize this course as either CPT or PSP certified. Personnel checking for compliance must manually examine each employee’s records to credit them with CPT and PSP training.

CONCLUSION

The resulting recommendations coincide with the findings and conclusion from all objectives and other related matters. They are intended to provide Department management with a tool to correct deficiencies and improve performance.

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

RECOMMENDATIONS

1. The POST requirements mandate all peace officers, including Reserve Level I and II, and dispatcher personnel complete 24 hours of CPT, including 14 specific PSP hours for specified peace officers, except reserve officers, within the assigned two-year period. It is recommended the Department revise policy to match the POST requirements and brief training personnel regarding CPT and PSP requirements. (Objective No. 1)
2. Policy indicates personal training files are required to include at least a printout of all training the employee has received including copies of POST certificates, copies of training certificates, and mandated tests. It is recommended the Department review the policy to determine if a more efficient method for maintaining personal training files, such as, requiring an official current transcript in lieu of all documents required in the current policy. (Objective No. 2, Other Related Matters)
3. Policy indicates personal training files are required to include at least a printout of all training the employee has received including copies of POST certificates, copies of training certificates, and mandated tests. It is recommended the EPD update personal training files to ensure they are maintained according to policy. (Objective No. 2, Other Related Matters)
4. Policy mandates that personal training files should not contain personal information. It is recommended that EPD ensure personal training files do not contain personal information. (Objective No. 2)
5. Policy does not include a notification process in the event that personal information may have been compromised. It is recommended the Department review the policy to determine if it should be revised to include a notification process. (Objective No. 2, Other Related Matters)
6. Policy indicates each station shall have their training program inspected by Division's command personnel at least once a year. EPD command personnel should develop a mechanism to ensure that each station is inspected annually, including EPD Headquarters training program. (Objective No. 3)
7. Completed CPT information recorded into the EDI and LMS systems is not always consistently entered into both systems. In addition, LMS is unclear as to the actual date of any training. Therefore, it is recommended the Department review the

CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A

tracking of CPT classes and determine if CPT needs to be recorded in both EDI and LMS. Furthermore, all station training personnel and training managers should have access to the centralized system.

(Other Related Matters)

8. Auditors noted personal training files were voluminous and included repetitive or expired training records. Therefore, it is recommended that the Department establish a training records retention policy that specifies what documents should be maintained in the personal training file and the retention period.

(Other Related Matters)

9. Auditors noted several POST certified course titles were not used in LMS creating confusion in tracking CPT training. It is recommended the Department use the official POST certified course title when entering CPT classes into LMS.

(Other Related Matters)

View of Responsible Officials

A copy of the audit report was provided to the East Patrol Division command staff, the Training Bureau, and the Office of the Inspector General (OIG) to offer them an opportunity to comment. Management from the East Patrol Division and the Training Bureau generally agreed with the findings. The OIG did not provide any feedback.

**CONTINUING PROFESSIONAL TRAINING AUDIT – EAST PATROL DIVISION
Project No. 2017-7-A**

This audit was submitted on this 19th day of September 2017, by the Audit and Accountability Bureau.

Original signature on file at AAB

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