

LOS ANGELES COUNTY SHERIFF'S DEPARTMENT



BASIC SHOOTING REQUIREMENTS AUDIT-
CENTRAL PATROL DIVISION
2016-8-A

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

**BASIC SHOOTING REQUIREMENTS AUDIT –
CENTRAL PATROL DIVISION
Project No. 2016-8-A
AUDIT REPORT**

PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Basic Shooting Requirements Audit – Central Patrol Division 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), Central Patrol Division and Training Bureau, complied with Department policies and procedures regarding basic shooting requirements for armed Department personnel.

The AAB conducted this performance audit under the guidance of Generally Accepted Government Auditing Standards. 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.¹

BACKGROUND

The use of deadly force is one of the most heavily scrutinized events in law enforcement, and may only be used under restrictive conditions. It is a last resort measure used to protect the lives of victims, bystanders, and law enforcement officers. Improper use of firearms may lead to loss of life or significant injury to persons. As a perishable skill, proficiency with a firearm must be demonstrated on a regular basis.

On January 1, 2015, the Department implemented a revised policy on Basic Shooting Requirements. In order to meet these standards, personnel who are subject to the Department's shooting requirements must shoot a qualifying score during the first quarter of the calendar year with their on-duty firearm during their alphabetically-assigned month.²

The Department uses various shooting ranges to administer its shooting qualification course. The Training Bureau issues a Mobile Range Operator's Manual, which details policies and procedures for shooting range operations.

¹ United States Government Accountability Office – By the Comptroller General of the United States, December 2011, Government Auditing Standards 2011 Revision.

² Monthly assignments are based on the employees' last names. For example, employees with last names beginning with A through F must qualify in the month of January.

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Qualification scores are recorded on a Scantron scorecard.³ A perforated section of the scorecard must be completed with the Department personnel's identifying information, the date, and the score(s) attained. This section is signed by the Shooting Range Operator, removed, and provided to Department personnel as a receipt (referred to as the scorecard stub).

The Scantron scorecards are then sent to the Training Bureau, who is responsible for logging and transferring the scores from the Scantrons into the Weapons Qualification System (WQS).⁴ The Training Bureau is responsible for maintaining both the WQS and the Scantron scorecards. Personnel and units may also maintain records such as the scorecard stubs; however, this practice is not mandated by Departmental policy.

During the first quarter of the calendar year, the Department issues to Deputy personnel an appropriate allotment of new factory service ammunition at Department expense.⁵ Personnel may receive their annual allotment at the shooting range during their qualification process. The ammunition exchange is documented on the Scantron scorecard and recorded in the WQS.⁶

Personnel who do not shoot for qualification with their on-duty firearm during the first quarter have "failed to shoot."⁷ Personnel who shoot, but do not achieve a passing score (a minimum of 70 out of 100) have "failed to qualify."⁸ Personnel who fail to shoot or fail to qualify are required to attend a remediation course following their quarter of delinquency. The Training Bureau shall inform each Division of personnel who failed to meet the basic shooting requirements. The Training Bureau prepares a Delinquency List to their respective Division, which specifies the personnel who have failed to shoot a qualification course.

According to the Executive Directive titled, "First Quarter 2016 Firearms Qualification," dated April 22, 2016, Divisions are instructed to rely on the Delinquency Lists to provide them with a representation of all personnel who failed to participate in the combat training exercise (failed to shoot) during the first quarter. However, it is the responsibility of the Division to obtain a final disposition for each personnel listed. The Divisions are informed that personnel appearing on the Delinquency List may

³ Scantron is a proprietary name for the Scantron Corporation which makes machine-readable paper forms on which data can be entered on optical mark recognition and imaging scanners that read them.

⁴ The WQS is an Access database program which stores weapons qualification/training scores.

⁵ MPP §3-09/030.00 – Ammunition Allotment

⁶ There is an optical mark recognition circle with the word "DUTY" to be shaded on the Scantron scorecard to document whether an allotment of service ammunition was provided to the deputy.

⁷ MPP §3-01/050.73 – Failure to Shoot - Remedial Training

⁸ MPP §3-01/050.70 – Failure to Qualify - Remedial Training

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have had a prior exemption from shooting, or were listed in error due to a prior qualification. Those who were listed in error are required to provide proof of qualification, such as a scorecard stub. Personnel who fail to shoot two or more times within a five-year period may be subjected to further restrictions or discipline.

PRIOR AUDIT

This was the first Basic Shooting Requirement Audit conducted by the AAB.

METHODOLOGY

Scope

This audit encompassed four main objectives based on the Department's Manual of Policy and Procedures' (MPP) shooting policies:

- Basic Shooting Requirements, MPP §3-01/050.65
- Ammunition Allotment, MPP §3-09/030.00
- Failure to Shoot – Remedial Training, MPP §3-01/050.73
- Failure to Qualify – Remedial Training, MPP §3-01/050.70

The applicable policy sections were used to determine compliance with these policies and procedures. The Central Patrol Division was selected for this audit, which is comprised of Administration (Headquarters) and six stations: Avalon, Century, Compton, East Los Angeles, Marina Del Rey, and South Los Angeles.

The audit included reviews of all available records from the WQS, Scantron scorecards, scorecard stubs (originals and copies), Patrol School attendance records, training and personnel files, the Delinquency List, the Delinquency List response memorandums,⁹ and the unit's Performance Log Entries (PLE).¹⁰

Audit Time Period

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

⁹ Since the second quarter of 2015, Central Patrol Division units are required to respond to the Delinquency List via a response memorandum to their Division Chief. The response memorandum details the qualification status of each person listed on the Delinquency List. These records are maintained by Headquarters.

¹⁰ Performance Log Entries document a supervisor's observations about an individual's performance, and/or documents discussions between the supervisor and a subordinate. These records are expunged after a year from the date of issuance.

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Audit Population

Three separate populations were evaluated for this audit. Each population of the audit consisted of personnel from the rank of Division Chief through Deputy Sheriff (Sworn Personnel), Reserve Deputy Sheriffs (Reserves), and Security Officers. These personnel were identified using Central Patrol Division Personnel Identification Reports, Reserve listings from each station, the Delinquency List, and the WQS.

The population for Objective No. 1, Basic Shooting Requirements, was identified from the Central Patrol Division Personnel Identification Reports and from Reserve rosters from each station. A total of 802 personnel were identified. Auditors selected 130 personnel for review, consisting of Sworn Personnel, Reserves, and Security Officers.¹¹

The population for Objective No. 2, Ammunition Allotment, included Sworn Personnel and Reserves from Objective No. 1. The five Security Officers were not included as they are not subject to the same policy requirements.¹² The population for this objective was 125.

The population for Objective No. 3, Failure to Shoot, was comprised of the 117 personnel without scores in the WQS, who were identified on the Delinquency List for the Central Patrol Division for the first quarter of 2016.

The population for Objective No. 4, Failure to Qualify, was identified through the WQS and supported by a review of Scantron scorecards. Auditors identified two personnel for review.

¹¹ A statistically valid sample was identified using a statistical one-tail test with a 95% confidence level and a 4% error rate. Auditors obtained a statistically valid random sample of Sworn Personnel (87) located at each of the six stations for review. Auditors also selected 100% of personnel from Headquarters (5), Reserves (33), and Security Officers (5) for review.

¹² The requirements in the MPP §3-09/030.00, Ammunition Allotment, only refer to Sworn Personnel and Reserves, but do not include armed Security Officers. However, the Training Bureau indicated Security Officers are able to conduct an annual ammunition allotment exchange during the same designated time period.

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SUMMARY OF AUDIT FINDINGS

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

Overall, the Central Patrol Division and the Training Bureau did well in the following areas:

- Qualification with Primary On-Duty Firearm
- Failure to Shoot – Notification from Training Bureau
- Failure to Shoot – Contacted Delinquent Personnel

The audit identified the following areas in need of improvement:

- Qualification within Assigned Month
- Authorization to Deviate from Assigned Month
- Ammunition Allotment
- Failure to Shoot – Personnel Exempted
- Remediation for Failure to Shoot
- Failure to Qualify – Notification from Training Bureau

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Table No. 1 below is intended to show a summary of the audit findings.

Table No. 1: Summary of Audit Findings

Objective No.	Audit Objective	Met the Standard
1	BASIC SHOOTING REQUIREMENTS	
1(a)	QUALIFICATION WITH PRIMARY ON-DUTY FIREARM	
	<i>Determine if personnel subject to shooting requirements qualified within the first quarter with their primary on-duty firearm.</i>	99%
1(b)	QUALIFICATION WITHIN ASSIGNED MONTH	
	<i>Determine if personnel subject to shooting requirements qualified within their alphabetically-assigned month.</i>	88%
1(c)	AUTHORIZATION TO DEVIATE FROM ASSIGNED MONTH	
	<i>Determine if personnel who deviated from the alphabetically-assigned qualification month were authorized, in writing, by the employee's Unit Commander.</i>	0%
2	AMMUNITION ALLOTMENT	
	<i>Determine if personnel were issued an appropriate allotment of new factory service ammunition during the first quarter.</i>	29%
3	FAILURE TO SHOOT – REMEDIAL TRAINING	
3(a)	NOTIFICATION FROM TRAINING BUREAU	
	<i>Determine if the Training Bureau notified the Division Chief or Director of their assigned personnel who failed to shoot within 20 workdays after the previous quarter.</i>	100%
3(b)	PERSONNEL EXEMPTED	
	<i>Determine if personnel who failed to shoot received an exemption from their Division Chief.</i>	51%
3(c)	CONTACTED DELINQUENT PERSONNEL	
	<i>Determine if Division Headquarters contacted personnel who failed to shoot with their on-duty weapon to determine the reason for that failure.</i>	100%
3(d)	REMIATION FOR FAILURE TO SHOOT	
	<i>Determine if personnel who failed to shoot, and were not exempted, remediated within 30 calendar days of notification.</i>	24%
4	FAILURE TO QUALIFY – REMEDIAL TRAINING	
	<i>Determine if the Training Bureau notified the Division Chief or Director of their assigned personnel who were unable to qualify within 20 workdays after the previous quarter.</i>	0%

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Objective No. 1 – Basic Shooting Requirements

Objective No. 1(a) – Qualification with Primary On-Duty Firearm

Criteria

Manual of Policy and Procedures, Section 3-01/050.65, Basic Shooting Requirements, states:

During the first quarter period (January-March), sworn personnel through the rank of Division Chief, including Reserves, and Professional Staff members required to carry firearms during the course of their duties shall report to one of the Department ranges to shoot the Handgun Combat Qualification Course with their primary on-duty firearm, and achieve a minimum passing score of 70 out of a possible 100 points.

Audit Procedures

Auditors selected 130 Central Patrol Division personnel for review from a total population of 802.¹³ Auditors reviewed digital records from the WQS, Scantron scorecards and scorecard stubs, and other supporting documentation to determine whether the selected personnel qualified with their primary on-duty firearm in the first quarter.

Findings

For this objective, 129 of 130 (99%) personnel met the standard. One did not meet the standard because auditors were unable to locate any qualification documentation.

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

Qualification with Primary On-Duty Firearm		
Population	Qualified	Met the Standard
Sworn Personnel	91 of 92	99%
Reserves	33 of 33	100%
Security Officers	5 of 5	100%

¹³ Auditors deselected and replaced personnel who were relieved of duty, injured on duty, on Family and Medical Leave Act (FMLA), or on any another other approved long-term absence for any time during their alphabetically-assigned qualification month within the period of the audit as these personnel are exempt from firearm qualification.

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Objective No. 1(c) – Authorization to Deviate from Assigned Month

Criteria

Manual of Policy and Procedures, Section 3-01/050.65, Basic Shooting Requirements, states:

Any deviation from an employee's alphabetically-assigned qualification/training month shall be authorized, in writing, by the employee's Unit Commander. Such authorization shall include the specific month or months applicable.

Audit Procedures

Of the 130 personnel selected for review, 114 qualified during their alphabetically-assigned qualification month. Therefore, a total of 16 personnel were reviewed for this objective. Auditors reviewed documents from employees' training and personnel files to determine whether any deviation from their alphabetically-assigned qualification month was authorized by their Unit Commander.

Findings

None of the 16 (0%) personnel met the standard for this objective. Auditors were unable to locate documentation of written authorization to deviate from their alphabetically-assigned qualification month.

Objective No. 2 – Ammunition Allotment

Criteria

Manual of Policy and Procedures, Section 3-09/030.00, Ammunition Allotment, states:

...annually, all Deputy personnel (including reserve Deputy personnel) shall be issued, at Department expense, an appropriate allotment of new factory service ammunition during the period January-April only...

The Mobile Range Operator's Manual §VII C.1, states:

Duty ammo is exchanged at the mobile ranges from January through March...

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Audit Procedures

For this objective, auditors selected the same sample of 130 personnel from Objective No. 1. Five Security Officers were deselected because they are not subject to the same policy requirements. Therefore, auditors reviewed 125 records for this objective. The data in the WQS is produced by the Scantron scorecards, which indicate whether an ammunition exchange occurred. In order to reconcile whether the ammunition exchange, as documented by the WQS occurred, auditors reviewed and compared the available Scantron scorecards.

Findings

Thirty-six of the 125 (29%) personnel met the standard for this objective. There was no documentation or evidence an ammunition allotment exchange occurred for the remaining 89 records.

Objective No. 3 – Failure to Shoot – Remedial Training

Objective No. 3(a) – Notification from Training Bureau

Criteria

Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot – Remedial Training, states:

The Training Bureau shall, within 20 workdays after the previous quarter, notify the Division Chiefs or Directors of the assigned personnel who failed to shoot.

Audit Procedures

Auditors identified a total population of 117 personnel from the First Quarter Central Patrol Division Delinquency List. The list is comprised of all personnel who did not have scores listed in the WQS during the first quarter.

Auditors reviewed the Office Correspondence from the Assistant Sheriff with responsibility over the Training Bureau dated April 22, 2016, and the accompanying Delinquency List to determine whether the Training Bureau notified the Central Patrol Division, within 20 workdays after the previous quarter, of personnel who did not have scores listed in the WQS.

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Findings

The Training Bureau met the standard for all 117 (100%).

Objective No. 3(b) – Personnel Exempted

Criteria

Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot – Remedial Training, states:

Those personnel who failed to shoot without having been exempted by their Division Chief or Director shall be allowed to remediate within thirty calendar days of notification...¹⁴

Audit Procedures

Auditors used the same 117 personnel listed on the Delinquency List.¹⁵ Of the 117 names, auditors determined there were 25 personnel who presented documentation of a qualifying score during the first quarter, consequently they were not selected for this review.

For the remaining 92 personnel, auditors contacted the various units of assignments and reviewed personnel records, as well as other documentation, to determine whether the personnel were exempt from qualification.

Findings

Forty-seven of the 92 (51%) personnel had a valid exemption, meeting the standard for this objective. Of the remaining 45 personnel, auditors found no proof of exemption and were deemed as having failed to shoot.

¹⁴ An additional provision of this policy is addressed in Other Related Matters No. 3, Lack of Delinquency Records Retention.

¹⁵ There were nine Sworn Personnel who attended Patrol School during the audit period; however, they had no qualifying scores listed in the WQS. Auditors contacted a manager at the Training Bureau who indicated Sworn Personnel are given credit for having qualified despite there being no scorecard issued or score documented in the WQS. For the purposes of this audit, they were deemed to have not qualified due to the lack of supporting documentation. This issue is further addressed in Other Related Matters.

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Objective No. 3(c) – Contacted Delinquent Personnel

Criteria

Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot – Remedial Training, states:

Personnel who failed to shoot with their on-duty weapon shall be contacted by their Division headquarters to determine the reason for that failure.

Audit Procedures

Of the 117 personnel listed on the Delinquency List, auditors reviewed the 45 personnel who failed to shoot. Auditors reviewed documents from the employees' training and personnel files, response memorandums, and PLEs to determine if the delinquent personnel were contacted.

Findings

All 45 (100%) records reviewed met the standard for this objective.

Objective No. 3(d) – Remediation for Failure to Shoot

Criteria

Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot – Remedial Training, states:

Those personnel who failed to shoot... shall be allowed to remediate within thirty calendar days of notification...

Audit Procedures

Of the 117 personnel listed on the Delinquency List, 45 personnel were determined to have failed to shoot. Auditors reviewed and compared digital records from the WQS, available Scantron scorecards, scorecard stubs, and other supporting documentation to determine whether the personnel remediated during the second quarter.

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Findings

Eleven of the 45 (24%) personnel met the standard for this objective. Auditors were unable to locate any evidence demonstrating the remaining 34 personnel remediated during the second quarter.

Objective No. 4 – Failure to Qualify – Remedial Training

Criteria

Manual of Policy and Procedures, Section 3-01/050.70, Failure to Qualify – Remedial Training, states:

The Training Bureau shall, within 20 workdays after the previous quarter notify the Division Chief or Director of their assigned personnel who were unable to qualify.

Personnel, who were unable to achieve a score of at least 70 with their on-duty weapon, shall be contacted by their Division headquarters to determine the reason for that failure.

Audit Procedures

Auditors reviewed the WQS to determine whether any personnel had a failing qualification score during the audit time period. According to the WQS, two employees had failing qualification scores; therefore, both were selected for review.

Auditors reviewed the memorandum and attached the Delinquency List to determine whether the Training Bureau notified the Central Patrol Division within 20 workdays after the previous quarter, of their personnel with failing qualification scores listed in the WQS.

Findings

None of the 2 (0%) personnel met the standard for this objective.

Auditors discovered both scores were input errors by a Shooting Range Operator. The scores should have been recorded as “100.” Auditors confirmed the Scantron scorecards were erroneously recorded as a “0” and as a “10” indicating that at the time

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of entry, they were non-qualifying scores. Neither score was reported to the Central Patrol Division Headquarters, nor was either score corrected in the WQS.

ADDITIONAL INFORMATION

Of the 117 personnel appearing on the Delinquency List, auditors identified three distinct groupings, as represented in Table No. 4:

Table No. 4: Summary of Personnel without Scores in the WQS

Personnel without Scores in the WQS	
Group	Total
Qualification Score Missing from WQS – Later Showed Proof of Qualification	25
Qualification Score Missing from WQS – Did Not Shoot	45
Exempt (FMLA, IOD, ROD, Military Leave, Resigned)	47
TOTAL	117

OTHER RELATED MATTERS

Missing Qualification Scores – Lack of Internal Controls

The WQS is the primary tracking system for all shooting qualifications, yet there is a lack of key internal controls contributing to significant deficiencies in the system. Auditors found personnel on the Delinquency List who had passing qualification scores, but were not entered into the WQS. Furthermore, due to the lack of accountability in the handling of Scantron scorecards, auditors were unable to determine at which point in the process the Scantron scorecards were lost or misplaced.

The weapons qualification score reporting process is divided into three major phases. First, personnel attend a qualification course wherein their scores are transcribed onto Scantron scorecards by shooting range personnel. Next, the Scantron scorecards are remitted to the Training Bureau. Finally, the Scantron scorecards are processed and recorded into the WQS by the Training Bureau. Employees who do not have their scores recorded into the WQS are reported on the Delinquency List.

There is no mechanism to track the Scantron scorecards from the point they are completed, to the point they are entered into the WQS. Additionally, scores for employees who were erroneously placed on the Delinquency List are not logged and

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updated into the WQS. Without properly entering all scores, the WQS becomes progressively less reliable.

Because of the lack of reliability in the WQS, each patrol station in the Central Patrol Division now requires personnel to submit either originals or copies of their Scantron scorecard stubs to show proof of qualification, in the event they are placed on the Delinquency List.

Ammunition Allotment Procedures

The current ammunition allotment procedures do not have a control in place to limit the amount of duty ammunition personnel can obtain. Shooting range personnel document the amount of ammunition distributed on a daily basis; however, those amounts are not attributed to specific personnel. Although WQS records indicate when personnel exchange their ammunition in conjunction with a qualification, the WQS fails to capture those personnel who receive their ammunition allotment without shooting a qualifying score.

Ammunition Allotment Policy

Auditors noted the Ammunition Allotment policy does not address Security Officers who are subject to the Department's shooting requirements. The policy also covers a time period which does not correspond to the current quarter system (January - March), but rather corresponds with the former trimester system (January - April). The Mobile Range Operator's Manual states duty ammunition is exchanged at the mobile shooting ranges from January through March, which corresponds to the current quarter system.

Delinquency Records Retention

The Failure to Shoot policy indicates that personnel who have multiple delinquencies during a five-year period shall be subject to standard disciplinary measures. Auditors found the Department unable to comply with the disciplinary provisions of the failure to shoot policy as there is no standard mechanism to track past delinquencies. The Central Patrol Division units record failures to shoot in the response memorandums and through the use of PLEs. However, when conducting a five-year review, the Central Patrol Division units rely on unreliable sources, such as personal knowledge to accomplish their reviews.¹⁶ The Central Patrol Division Headquarters required all units

¹⁶ Auditors found that of those individuals who were identified as delinquent, response memorandums showed two individuals had previously violated the same policy since the second quarter of 2015. One of those may have been subject to standard disciplinary measures.

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to submit response memorandums, which may be a useful tool for these reviews; yet, the response memorandums have only been issued since the second quarter of 2015. Furthermore, the WQS does not include corrected scores or ensure the scores recorded are for duty firearms, precluding its use in documenting personnel who failed to shoot on multiple occasions within five years.

Shooting Range Operators – No Requirement to Record Each Score or Attempt

There is currently no requirement in either the MPP or the Mobile Range Operator's Manual that each score or attempt must be recorded, creating a potential risk that personnel qualification records are incomplete.

Shooting Range Operators – Errors in Codes

Shooting Range Operators often entered incorrect codes resulting in personnel having inaccurate qualification records. During the first quarter, auditors found Scantron scorecards completed with a "0029" (Combat Course) code instead of an applicable qualification course code, such as "0031" (Smith & Wesson M&P 9MM qualification code). According to the Training Bureau, the "0029" code should not be used during the first quarter.

According to the Training Bureau Management, Sworn Personnel who attend Patrol School during the first quarter and shoot a qualifying score are entered as "0029" instead of with the firearm-specific qualification code to record their time at the firing range as credit for the quarter's qualification.

Patrol School

Auditors discovered nine Sworn Personnel did not have a qualifying score which resulted in their names appearing on the Delinquency List. Auditors ascertained a practice of giving Sworn Personnel who attended Patrol School credit for qualifying during a given period if they successfully passed the firearms training portion of Patrol School. However, those scores are not recorded in the WQS.

Remediation Code is Not Firearm-Specific

Although policy specifies personnel must remediate if they fail to qualify during the first quarter, and must shoot their duty firearm during the second, third, and fourth quarters, the WQS does not record if personnel actually remediated with the same firearm or shot the combat course with their duty firearm.

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Within the WQS, the remediation course code, “0025”, and the combat course code, “0029”, failed to capture which firearm was used. Mobile Range Operators are instructed to handwrite the firearm used directly onto the Scantron scorecard. That information is not captured in the WQS, and is often omitted from the scorecard entirely.

Moreover, an employee who qualified with their off-duty or backup firearm, and not their duty firearm, would not appear on the Delinquency List. In addition, personnel who shoot a firearm for which they have not been trained (an unauthorized firearm) would also not appear on the Delinquency List.

Policy Language Clarification

Although units make contact with delinquent personnel, they do not document a reason for the delinquency in a clear manner. The current policy lacks a definition in its criteria that Division Chiefs or Directors must document a detailed reason for a delinquency.

Lack of Understanding on Remediation Policy Requirements

Auditor discussions with training staff at the Central Patrol Division stations indicate sworn personnel may not be aware of what constitutes a valid remediation. Staff stated many personnel believe they simply need to shoot the current course in order to meet the remediation policy requirements. Policy indicates personnel must shoot a distinct remediation course in addition to the current quarter’s qualification course in order to meet the remediation requirement.

Reserve Deputy Assignments Not Consistently Tracked

While obtaining the population for Reserves, auditors noted there is no consistent historical roster of Reserves who serve at each station. The Reserve Forces Bureau maintains historical strength reports, which list the number of Reserves assigned to each station rather than the names of Reserves serving at each station. Auditors found because there is no formal mechanism to track Reserves assigned to each station, Reserve coordinators at each station maintain their own logs, which may not coincide to records kept by the Reserve Forces Bureau.

CONCLUSION

The AAB considered the results of this audit to be a helpful management tool for all Department personnel; therefore, made the following recommendations.

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RECOMMENDATIONS

1. Policy indicates personnel must shoot within their alphabetically-assigned month, and receive written approval to deviate from the policy. It is recommended the Department conduct recurrent briefings of the shooting requirements policies regarding shooting during alphabetically-assigned months and exemptions. (Objective No. 1)
2. Shooting Range Operators are not consistently documenting whether an ammunition allotment exchange occurred, or whether Sworn Personnel exchanged their ammunition. It is recommended the Department conduct recurrent briefings of the ammunition allotment policies, including the proper documentation procedures. (Objective No. 2)
3. The Training Bureau generates a Delinquency List of personnel who did not shoot during the quarter, as reported by the WQS. It is recommended the Delinquency List include personnel who failed to achieve a passing score during a qualification quarter (i.e., a score less than 70). (Objective No. 4)
4. There is no standard procedure for collecting Scantron scorecards. It is recommended the Department develop a standardized process for the handling of Scantron scorecards from initial completion at the shooting ranges through ensuring all scores are entered into the WQS. The process should include internal controls to ensure all scorecards are delivered to the Training Bureau and limit the possibility of manipulation. (Other Related Matters)
5. Although personnel may appear on the Delinquency List, they may have in fact achieved a qualifying score. That score is not recorded consistently into the WQS after the qualification. It is recommended all qualification scores be properly entered into the WQS. Personnel who were erroneously placed on the Delinquency List should have their scores corrected and updated in the WQS. (Other Related Matters)
6. Because not all ammunition allotment exchanges are properly documented, there is a potential risk personnel may not be exchanging their ammunition, or may have received additional allotments. It is recommended the Department revise the Manual of Policy and Procedures so the amount of ammunition distributed to each employee is tracked and limited. (Other Related Matters)

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7. The policy regarding ammunition only specifies the allotment for Sworn Personnel and Reserves. It is recommend the Department update the current policy and procedures to include other armed personnel such as Security Officers. (Other Related Matters)
8. Non-qualifying scores are not accurately being recorded in the WQS. It is recommended Department procedures and the WQS be updated to include reporting of personnel who fail to shoot their duty firearm, and to track delinquencies and exemptions for a five-year period. (Other Related Matters)
9. Nine Sworn Personnel who attended Patrol School appeared on the Delinquency List. Auditors did not find a policy indicating Patrol School counts as a substitute for a qualifying course of fire. It is recommended the Department review its policy to determine whether the current practice is satisfactory for the purpose of reporting a qualification score. (Other Related Matters)
10. Auditors noted inconsistent methods and procedures by Mobile Range Operators. It is recommended Mobile Range Operators receive regular training to ensure all qualification scores are accurately entered, remediation is properly completed, ammunition exchanges are properly recorded, and Scantron scorecards are consistently completed and processed. (Other Related Matters).
11. Course codes are not always specific to the firearm that was used. It is recommended all course codes be firearm-specific to ensure records are accurate. (Other Related Matters)
12. Although Unit Commanders contact delinquent personnel, they do not document a specific reason for the delinquency. It is recommended the language in the current Department policy related to remedial training be clarified to include documenting the specific reason for any delinquency. (Other Related Matters)
13. Auditors noted there is no consistent historical roster of Reserves. It is recommended the Department develop a uniform historical tracking mechanism of all Reserves assigned to the Department. (Other Related Matters)
14. Auditors found several internal control issues including whether the WQS can be used as a reliable system. It is recommended the Department develop a fully integrated WQS capable of networking with the entire mobile shooting range fleet to ensure all scores are accurately recorded. Furthermore, weaknesses in the current WQS limit the amount of relevant data that is produced (e.g., the delinquency query is incapable of reporting all delinquencies). A user-friendly

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system would accurately record qualification scores and ensure courses are coded properly. It would also allow management to track and oversee qualification compliance and performance. (Other Related Matters)

View of Responsible Officials

On March 13, 2017, the Chief of the Central Patrol Division submitted a formal response to the AAB expressing agreement with the audit findings. On March 15, 2017, the Captain of the Training Bureau submitted a formal response expressing agreement with the audit findings. A copy of the report was provided to the Office of the Inspector General (OIG) to offer them an opportunity to comment. The OIG did not provide any feedback.

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This audit was submitted on this 15th day of March 2017, by the Audit and Accountability Bureau.

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