BASIC SHOOTING REQUIREMENTS AUDIT - SOUTH PATROL DIVISION
2017-1-A

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SHERIFF

May 30, 2017
PURPOSE

The Audit and Accountability Bureau (AAB) conducted the Basic Shooting Requirements Audit – South 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), South 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.

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. Personnel are also required to participate in a combat training exercise (not scored) with their on-duty firearm during the second, third, and fourth quarter.


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.
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.

Qualification scores are recorded on a Scantron scorecard. The Scantron scorecard must be completed with the Department member’s identifying information, the date, the score(s) attained, and is signed by the Shooting Range Operator or range staff. A perforated section (scorecard stub) is removed and provided to Department personnel as a receipt.

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). 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 allotment of new factory service ammunition at the Department’s expense. Personnel may receive their annual allotment at any range office or mobile range during their first quarter qualification process. The ammunition exchange is documented on the Scantron scorecard and recorded in the WQS.

Personnel who do not shoot for qualification with their on-duty firearm during the first quarter have “failed to shoot.” Personnel who shoot, but do not achieve a passing score (a minimum of 70 out of 100) have “failed to qualify.” Personnel who fail to shoot or fail to qualify are required to attend a remediation course within 30 days of notification. The Training Bureau shall inform each Division of their personnel who failed to meet the basic shooting requirements. The Training Bureau prepares a Delinquency List using WQS to the respective Division, which specifies the personnel who have failed to shoot a qualification course. The Delinquency List does not note personnel with failing scores in the WQS, personnel who failed to shoot within their
assigned month, nor list personnel who had authorized exemptions from the basic shooting requirements.

According to the Executive Directive memorandum 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 have an exemption from shooting, or were listed in error due to a qualification. Those found to be 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 duty restrictions or discipline.

PRIOR AUDIT

This was the second Basic Shooting Requirement Audit conducted by the AAB. A Basic Shooting Requirement Audit (Project No. 2016-8-A) examining the Central Patrol Division was concluded and published on March 15, 2017. That audit identified several areas in need of improvement relating to the shooting qualification score reporting process, remediation practices, and the WQS. The AAB made several recommendations designed to correct deficiencies in those areas. Currently, the Department is assessing the recommendations of that audit and a Corrective Action Plan is pending.

METHODOLOGY

Scope

This audit encompassed four main objectives:

- Basic Shooting Requirements, Manual of Policy and Procedures §3-01/050.65
- Ammunition Allotment, Manual of Policy and Procedures §3-09/030.00
- Failure to Shoot - Remedial Training, Manual of Policy and Procedures §3-01/050.73
- Failure to Qualify - Remedial Training, Manual of Policy and Procedures §3-01/050.70

Applicable policy sections were used to determine compliance with the Department’s Manual of Policy and Procedures’ (MPP) shooting policies. The South Patrol Division was selected for this audit, which is comprised of Administration (Headquarters) and six stations: Carson, Cerritos, Lakewood, Lomita, Norwalk, and Pico Rivera.
The audit included reviews of all available records from the WQS, Scantron scorecards, scorecard stubs (originals and copies), training and personnel files, the Delinquency List, the Delinquency List response memorandums, and the stations' Performance Log Entries (PLE).

Audit Time Period

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

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) and Reserve Deputy Sheriffs (Reserves). These personnel were identified using South Patrol Division Personnel Identification Reports, Reserves rosters from each station, the Delinquency List, and the WQS. There were no armed non-sworn employees serving in the South Patrol Division during the audit period.

The population for Objective No. 1, Basic Shooting Requirements, was identified from the South Patrol Division Personnel Identification Reports and from Reserves rosters from each station. A total of 790 personnel were identified. Auditors selected 130 personnel for review, consisting of Sworn Personnel and Reserves.

The population for Objective No. 2, Ammunition Allotment, included the same 130 Sworn Personnel and Reserves from Objective No. 1.

The population for Objective No. 3, Failure to Shoot, was from the 790 personnel. One hundred twenty-three personnel without scores in the WQS were identified on the Delinquency List for the South Patrol Division for the first quarter of 2016.

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10 Since the first quarter of 2015, South Patrol Division stations 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.

11 The PLEs 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.

12 Using a statistical one-tail test with a 95% confidence level and a 4% error rate, a statistically valid sample was identified. Auditors obtained a statistically valid random sample of Sworn Personnel (88) and Reserves (39) located at each of the six stations for review. Auditors also selected 100% of personnel from Headquarters (5), for review. However, two were deselected due to a valid shooting exemption. Therefore, 130 were reviewed.

13 Auditors deselected and replaced personnel who were relieved of duty (ROD), injured on duty (IOD), on Family and Medical Leave Act (FMLA), or on any 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.
The population for Objective No. 4, Failure to Qualify, comprised from the 790 personnel, was identified through the WQS and supported by a review of Scantron scorecards. Auditors identified three personnel with failing qualification scores listed in the WQS and were selected for review.

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.

The South Patrol Division and the Training Bureau achieved excellent results in the following areas:

- Failure to Shoot - Notification from Training Bureau
- Failure to Shoot - Contacted Delinquent Personnel

The South Patrol Division and the Training Bureau achieved varied results for the remaining objectives, which did not meet the desired standard. The results of the audit are summarized in Table No. 1 on the following page.
Table No. 1: Summary of Audit Findings

<table>
<thead>
<tr>
<th>Objective No.</th>
<th>Audit Objective</th>
<th>Met the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>BASIC SHOOTING REQUIREMENTS</td>
<td></td>
</tr>
<tr>
<td>1(a)</td>
<td>QUALIFICATION WITH PRIMARY ON-DUTY FIREARM</td>
<td>95%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel subject to shooting requirements qualified within the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>first quarter with their primary on-duty firearm.</td>
<td></td>
</tr>
<tr>
<td>1(b)</td>
<td>QUALIFICATION WITHIN ASSIGNED MONTH</td>
<td>86%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel subject to shooting requirements qualified within their</td>
<td></td>
</tr>
<tr>
<td></td>
<td>alphabetically-assigned month.</td>
<td></td>
</tr>
<tr>
<td>1(c)</td>
<td>AUTHORIZATION TO DEVIATE FROM ASSIGNED MONTH</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel who deviated from the alphabetically-assigned qualification</td>
<td></td>
</tr>
<tr>
<td></td>
<td>month were authorized, in writing, by the employee's Unit Commander.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>AMMUNITION ALLOTMENT</td>
<td>54%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel were issued an appropriate allotment of new factory</td>
<td></td>
</tr>
<tr>
<td></td>
<td>service ammunition during the first quarter.</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>FAILURE TO SHOOT - REMEDIAL TRAINING</td>
<td></td>
</tr>
<tr>
<td>3(a)</td>
<td>NOTIFICATION FROM TRAINING BUREAU</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Determine if the Training Bureau notified the Division Chief or Director of their</td>
<td></td>
</tr>
<tr>
<td></td>
<td>assigned personnel who failed to shoot within 20 workdays after the previous</td>
<td></td>
</tr>
<tr>
<td></td>
<td>quarter.</td>
<td></td>
</tr>
<tr>
<td>3(b)</td>
<td>PERSONNEL EXEMPTED</td>
<td>52%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel who failed to shoot received an exemption from their</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Division Chief.</td>
<td></td>
</tr>
<tr>
<td>3(c)</td>
<td>CONTACTED DELINQUENT PERSONNEL</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Determine if Division Headquarters contacted personnel who failed to shoot with</td>
<td></td>
</tr>
<tr>
<td></td>
<td>their on-duty weapon to determine the reason for that failure.</td>
<td></td>
</tr>
<tr>
<td>3(d)</td>
<td>REMEDIATION FOR FAILURE TO SHOOT</td>
<td>27%</td>
</tr>
<tr>
<td></td>
<td>Determine if personnel who failed to shoot, and were not exempted, remediated</td>
<td></td>
</tr>
<tr>
<td></td>
<td>within 30 calendar days of notification.</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>FAILURE TO QUALIFY - REMEDIAL TRAINING</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>Determine if the Training Bureau notified the Division Chief or Director of their</td>
<td></td>
</tr>
<tr>
<td></td>
<td>assigned personnel who were unable to qualify within 20 workdays after the</td>
<td></td>
</tr>
<tr>
<td></td>
<td>previous quarter.</td>
<td></td>
</tr>
</tbody>
</table>
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, (December 2014), 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 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, 124 of 130 (95%) personnel met the standard. Six personnel did not meet the standard. Of those six, three personnel did not have any qualification documentation for the first quarter, and three additional personnel shot during the first quarter, but did not meet the standard for qualification.

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

<table>
<thead>
<tr>
<th>Population</th>
<th>Qualified</th>
<th>Met the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sworn Personnel</td>
<td>86 of 91</td>
<td>95%</td>
</tr>
<tr>
<td>Reserves</td>
<td>38 of 39</td>
<td>97%</td>
</tr>
</tbody>
</table>
Objective No. 1(b) – Qualification within Assigned Month

Criteria

Manual of Policy and Procedures, Section 3-01/050.65, Basic Shooting Requirements, (December 2014), states:

*Personnel subject to the Department’s shooting requirements shall shoot within their alphabetically-assigned month.*

*Shooting assignments are based on the last name initial as follows:*

- **Last name begins with letters:** Shall shoot in the months of:
  - **A through F** January, April, July, and October
  - **G through N** February, May, August, and November
  - **O through Z** March, June, September, and December

Audit Procedures

Using the population from Objective No. 1(a), auditors reviewed digital records from the WQS, Scantron scorecards and scorecard stubs, and other supporting documentation to determine whether the selected personnel shot within their alphabetically-assigned month in the first quarter. Of the 130 personnel selected for review, six were excluded from this objective as they did not have any qualification documentation for the entire quarter. Therefore, 124 personnel were reviewed.

Findings

For this objective, 107 of the 124 (86%) personnel met the standard. Seventeen personnel did not meet the standard because they did not shoot for qualification during their assigned month.

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

<table>
<thead>
<tr>
<th>Population</th>
<th>Qualified</th>
<th>Met the Standard</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sworn Personnel</td>
<td>76 of 86</td>
<td>88%</td>
</tr>
<tr>
<td>Reserves</td>
<td>31 of 38</td>
<td>82%</td>
</tr>
</tbody>
</table>
Objective No. 1(c) – Authorization to Deviate from Assigned Month

Criteria

Manual of Policy and Procedures, Section 3-01/050.65, Basic Shooting Requirements, (December 2014), 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 124 personnel selected for review in Objective 1(b), 107 qualified during their alphabetically-assigned qualification month. Therefore, a total of 17 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 17 (0%) personnel met the standard for this objective. Auditors were unable to locate 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, (December 2013), 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…
Manual of Policy and Procedures, Section 3-09/030.15, Service Ammunition-Procedure, (April 1996), states:

*Any time during January-April only, a Deputy may present his card at any range office and receive an appropriate allotment of new factory service ammunition.*

Audit Procedures

For this objective, auditors selected the same sample of 130 personnel from Objective No. 1. 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 occurred, as documented by the WQS, auditors reviewed and compared the available Scantron scorecards. Of the 130 selected for review, three personnel did not shoot during the first quarter and were not included in this objective. Therefore, 127 personnel were reviewed.

Findings

Sixty-nine of the 127 (54%) personnel met the standard for this objective. There was no documentation or evidence an ammunition allotment exchange occurred for the remaining 58 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, (December 2014), 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 123 personnel from the First Quarter South Patrol Division Delinquency List. The list is comprised of personnel who did not have scores listed in the WQS during the first quarter of 2016.
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 South Patrol Division, within 20 workdays after the previous quarter, of personnel who did not have scores listed in the WQS.

Findings

The Training Bureau met the standard for all 123 (100%) personnel for this objective.

Objective No. 3(b) – Personnel Exempted

Criteria

Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot - Remedial Training, 12/11/14, 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…

CRITERIA CLARIFICATION: As stated in the criteria, Division Chiefs or Directors may exempt personnel from shooting qualification. Personnel with written documentation that they were IOD, ROD, FMLA, or had a valid pregnancy certification during the first quarter of 2016 were exempted from qualifying.

Audit Procedures

Auditors used the same 123 personnel listed on the Delinquency List. Of the 123 personnel, auditors determined there were 21 personnel who ultimately later presented documentation of a qualifying score during the first quarter, consequently they were not selected for this review.

For the remaining 102 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.

14 For the purposes of this audit, personnel who attended patrol school and did not shoot the first quarter qualification course were deemed to have not qualified due to the lack of qualification documentation and were not exempt from qualification. This issue is further addressed in other related matters.
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Findings
Fifty-three of the 102 (52%) personnel met the standard for this objective. Of the remaining 49 personnel, auditors could not locate documentation of proof of exemption and resulted as having failed to shoot or qualify.

Objective No. 3(c) – Contacted Delinquent Personnel

Criteria
Manual of Policy and Procedures, Section 3-01/050.73, Failure to Shoot - Remedial Training, (December 2014), 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 123 personnel listed on the Delinquency List, auditors reviewed the 49 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 49 (100%) personnel 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, (December 2014), states:

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

Audit Procedures
Of the 123 personnel listed on the Delinquency List, 49 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 within 30 calendar days of notification.
Findings

Thirteen of the 49 (27%) personnel met the standard for this objective. Auditors were unable to locate any evidence demonstrating the remaining 36 personnel remediated within 30 calendar days of notification.

Objective No. 4 – Failure to Qualify - Remedial Training

Criteria

Manual of Policy and Procedures, Section 3-01/050.70, Failure to Qualify - Remedial Training, (December 2014), 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 and the available corresponding Scantron scorecards and scorecard stubs to determine whether any personnel had a failing qualification score during the audit time period. According to those documents, three employees had failing qualification scores; therefore, three personnel were selected for review.

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 South Patrol Division, within 20 workdays after the previous quarter, of personnel with failing qualification scores listed in the WQS.

Auditors discovered the three failing scores listed in the WQS were not included in the Delinquency List, therefore, not reported to the South Patrol Division Headquarters.

Findings

None of the 3 (0%) personnel met the standard for this objective.
ADDITIONAL INFORMATION

Of the 123 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

<table>
<thead>
<tr>
<th>Group</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Qualification Score Missing from the WQS – Did Not Shoot</td>
<td>49</td>
</tr>
<tr>
<td>Qualification Score Missing from the WQS – Documentation of Shoot Not Recorded in WQS</td>
<td>21</td>
</tr>
<tr>
<td>Exempt (Family Medical Leave Act, Injured on Duty, Relieved of Duty, Military Leave, Resigned)</td>
<td>53</td>
</tr>
<tr>
<td>TOTAL</td>
<td>123</td>
</tr>
</tbody>
</table>

OTHER RELATED MATTERS

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

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 with 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 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 within the South Patrol Division, currently requests personnel to submit either originals or copies of their Scantron scorecard stubs to show proof of qualification to their respective station Training Units, 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*

The current ammunition allotment policy states duty ammunition is exchanged with the former trimester system (January - April) however, the policy covers a time period which does not correspond to the current quarter system (January – March).

*Delinquency Records Retention*

The Failure to Shoot policy indicates personnel who have multiple delinquencies during a five-year period shall be subject to standard disciplinary measures. Auditors found the Division, as a whole, does not comply with the disciplinary provisions of the Failure to Shoot policy as there is no standard mechanism to track past delinquencies. The South Patrol Division records failures to shoot in response memorandums and through the use of the PLEs. The PLEs are removed after a year, making them ill-suited for long-term tracking. The South Patrol Division began using response memorandums in 2015, which makes them unsuitable for a five-year reference.

The Cerritos, Norwalk, and Lakewood patrol stations place memorandums in the personnel files of each employee who failed to shoot. However, these practices are not consistently applied throughout the Division or the Department, limiting their effectiveness.

*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.
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*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 “0021” (Smith & Wesson 9MM DA/SA Handguns, Not M&P) code instead of an applicable qualification course code, such as “0031” (Smith & Wesson M&P 9MM). The WQS does not recognize the “0021” code as a qualification course, and subsequently places personnel with that code onto the Delinquency List.

*Patrol School*

Auditors discovered seven sworn personnel who did not have a qualifying score which resulted in their names appearing on the Delinquency List. Sworn personnel who may have successfully passed the firearms training portion of Patrol School were 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 on-duty firearm within 30 calendar days of notification, the WQS does not record if personnel actually remediated with the same firearm or shot the combat course with their on-duty firearm.

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, employees who qualified with their off-duty or backup firearm, and not their primary on-duty firearm, would not appear on the Delinquency List. In addition, personnel who shoot a firearm for which they have not received the Department approved training class 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.
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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 there is no formal mechanism to track Reserves assigned to each station. Reserve coordinators at each station maintained their own logs, which may not coincide to the records kept by the Reserve Forces Bureau.

CONCLUSION

During the course of the audit, auditors assessed the policies, procedures, and practices related to the basic shooting requirements and identified several areas in need of improvement.

RECOMMENDATIONS

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.

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. There is a potential risk, personnel may not be exchanging their ammunition, or may have received additional allotments. It is recommended the Department conduct recurrent briefings of the ammunition allotment policies, including the proper documentation procedures for tracking. (Objective No. 2, Other Related Matters)

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. (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 Scantron scorecards are delivered to the Training Bureau to limit the possibility of manipulation. (Other Related Matters)

5. Qualification scores are not consistently recorded into the WQS. It is recommended all qualification scores be properly entered into the WQS. Personnel who were erroneously placed on the Delinquency List should also have their scores corrected and updated in the WQS. (Other Related Matters)

6. It is recommended Department procedures and the WQS be updated to include reporting of personnel who fail to shoot their primary on-duty firearm, fail to qualify with their primary on-duty firearm, and to track delinquencies and exemptions for a five-year period. (Other Related Matters)

7. It is recommended the Department review whether the current practice for personnel who attend Patrol School and fulfilling qualification conforms to Departmental policy. (Other Related Matters)

8. Auditors noted inconsistent methods and procedures by Mobile Range Operators. It is recommended Mobile Range Operators receive regular and recurrent training to ensure all qualification scores are accurately entered, remediation is properly completed, and Scantron scorecards are consistently completed and processed. (Other Related Matters).

9. 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)

10. 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)

11. 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)

12. 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 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

A copy of the audit report was provided to the South 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 South Patrol Division and the Training Bureau generally agreed with the findings. The OIG did not provide any feedback.
This audit was submitted on this 30th day of May 2017, by the Audit and Accountability Bureau.

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