

**Audit and Accountability Bureau
FIELD TRAINING PROGRAM FILE
MANAGEMENT AND RETENTION AUDIT
Project No. 2014-10-A**

PURPOSE

The Field Training Program File Management and Retention Audit was conducted to provide the Los Angeles County Sheriff's Department ("LASD" or "Department") managers with a review of the current procedures used in managing the Department's Field Training Program (FTP) files. The intent was to determine compliance of the FTP with Department policies and procedures as found in the Manual of Policy and Procedures (MPP), Field Operations Directives (FOD), Field Training Program Manual¹ (FTPM), and Administrative Professionals Handbook (APH).

During the research phase of the audit, numerous conflicts in the aforementioned documents created difficulties in establishing clear compliance.² Recognizing the conflict in directives, policies, and procedures, the audit focus shifted from an evaluation of compliance based on policies, directives and procedures, to a performance and policy audit. The evidence collected was to prove or disprove conflict of practice resulting from various overlapping and/or inconsistent policies.

The Audit and Accountability Bureau (AAB) conducted this audit under the guidance of generally accepted government auditing standards, specifically pertaining to obtaining sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives.³ The AAB has determined the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objectives.

BACKGROUND

The Department FTP is designed to provide managers, supervisors, and Field Training Officers (FTOs) with the tools to train and monitor deputies newly assigned to patrol duties. The FTOs are required to record and maintain the necessary documents to track a deputy's progress during the training period. The overall goal is to produce competently trained deputies who are capable of performing requisite duties and responsibilities.

Proper documentation is necessary to demonstrate successful completion of the program including competent performance in all required areas; documented deficiencies for persons failing to complete the program; adherence to policy; and training supervisors and managers in maintaining program records.

¹ The Field Training Program Manual dated May 2014, was evaluated for this Audit.

² For detailed conflicting documentation, see the section of this audit entitled, "Other Related Matters".

³ United States Government Accountability Office – By the Comptroller General of the United States, December 2011, Government Auditing Standards 2011 Revision.

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In researching and developing the audit, the auditors discovered there were several currently active directives that address the handling and maintenance of FTP documents. Among them:

- FTPM, Section A: Management of the Field Training Program, Training Responsibilities, Station Captains
- FTPM, Section A: Management of the Field Training Program, Training Responsibilities, Master Field Training Officer/Administrator
- FOD 86-1 (Revised November 27, 1991) Training Records Retention⁴
- FOD 86-01 (Revised April 28, 2014)⁵
- FOD 86-10 (Revised October 6, 1986) Deputy Orientation Tracking System
- FOD 91-3 (Revised April 1995) Training Officer/Trainee Standards of Conduct. Although this directive requires both the training officer and the trainee to receive a copy of the directive, the FTPM requires a signed receipt.

During fieldwork, it was discovered; units created independent forms to satisfy the standard documents required under the above directives. For the purposes of this audit, these were accepted as a standard; however, the different forms led to inconsistent documentation of the FTP.

This report is the first Field Training Program File Management and Retention audit conducted by the AAB.

METHODOLOGY

Audit Time Period

The time period for this audit was June 1, 2014, to November 30, 2014.

Audit Population

There were three different populations that were included as part of the four objectives for the audit.

- A sample of 59 files were randomly selected from the population of 150 Department-wide FTP files of personnel who *successfully completed* the FTP for the audit time period (hereafter referred to as “successful completions”).⁶

⁴ This FOD version is found on the Field Operations Support Services Intranet site and is currently active.

⁵ This FOD version is found in the Field Training Program Manual and is currently active.

⁶ Statistically valid sample utilizing a one tail test with a 95 percent confidence level and a 4 percent error rate.

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- The entire population of 22 Department-wide FTP files of personnel who *did not complete* the FTP for the audit time period (hereafter referred to as “patrol failures”).⁷
- The entire population of 24 training files for the supervisors, administrators, and/or coordinators overseeing the Department’s FTP at a patrol assignment.

SUMMARY OF AUDIT FINDINGS

This audit determined the Department properly created and stored files relating to the FTP (100% compliance). However, within the FTP training files (successful completion and patrol failures); the Department was much less successful in ensuring they contained the required documents (14% to 20% compliance); in ensuring those documents were properly completed (47% to 77% compliance); and in ensuring the personnel files contained required and completed documents (both at 29% compliance).

Although the individual field units conducting patrol training made concerted efforts to comply with Department policies and directives pertaining to the FTP, their efforts were diminished:

- Many units developed individual versions of required forms, creating inconsistencies within the FTP;
- There are various Department mandates guiding the FTP regarding retention and file management, such as those found in the FODs, the FTPM, and the APH. However, these policies/directives are not consistent.

The audit also determined the Department is in partial compliance (71%) with the California Peace Officer Standards and Training (POST) Administrative Manual regarding the training requirements for supervisors, administrators, and/or coordinators.

This section was intentionally left blank

⁷ Three patrol training files were deselected as a result of training files not being created. Patrol training failures occurring during patrol school do not enter the station training program.

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Table No. 1 – Audit Objectives and Summary of Findings

Objective No.	Description of Audit Objectives	Met the Standard
1	Review of Field Training Program Files	
1(a)	Existence of Field Training Program Files Successful Completions: Patrol Failures:	59/59 (100%) 22/22 (100%)
1(b)	Field Training Program Files - Required Documents Successful Completions: Patrol Failures:	12/59 (20%) 3/22 (14%)
1(c)	Field Training Program Files - Completed Documents Successful Completions: Patrol Failures:	28/59 (47%) 17/22 (77%)
2	Personnel Files	
2(a)	Existence of Field Training Program Personnel Files	59/59 (100%)
2(b)	Field Training Program Personnel Files - Required Documents	17/59 (29%)
2(c)	Field Training Program Personnel Files - Completed Documents	17/59 (29%)
3	File Storage	
3(a)	Restricted Access/Secured Storage of Field Training Program Files Successful Completions: Patrol Failures:	59/59 (100%) 22/22 (100%)
3(b)	Restricted Access/Secured Storage of Personnel Files	59/59 (100%)
4	Supervisor/Administrator/Coordinator Training	
4	Supervisor/Administrator/Coordinator (SAC) - POST Training Completed	17/24 (71%)
OTHER RELATED MATTERS (Issues not governed by policy)		
Conflicting Policies and Directives		
Storage of Files Conflict		

DETAILED FINDINGS

Objective No. 1 Review of Field Training Program Files

Objective No. 1(a) Existence of Field Training Program Files

Criteria

The Field Operations Directive 86-01 (Revised April 28, 2014), states:

“Field Training Program (FTP) training records are those documents outlined in the Field Training Officer Manual such as: the Standardized Evaluation Form, Training Checklist, Written Examinations, Quizzes, Performance Tests, Practice Reports and Field Training Program Trainee Tracking Form (SH-AD 645).

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Audit Procedures

FTP files were located for each of the randomly selected samples pertaining to successful completions and patrol failures to determine if the FTP files met the standard for this objective.

Findings

All of the 59 (100%) sampled FTP files pertaining to successful completions met the standard for this objective.

All of the 22 (100%) FTP files pertaining to patrol failures met the standard for this objective.

Objective No. 1(b) Field Training Program Files - Required Documents

Criteria

Several currently active directives were identified that address the handling and maintenance of FTP documents. For this audit, a broad view of the various directives were reviewed, for which a determination was made that the forms listed were required in one or more of the following directives.

FOD 86-10 (Revised 10-6-86), Deputy Orientation Tracking System, states:

"Upon a trainee's arrival at a field operations station, a Deputy Orientation Program Tracking card (SH-AD 645) shall be initiated."

FTPM, Section A, Management of the Field Training Program, Station Captains, states:

*"Station captains shall ensure all current FTO's have read Field Operations Directive [91-3], Standards of Conduct (**Appendix 2**) and the Field Training Officer Guidelines (**Appendix 3**) and that each has signed an acknowledgment of receipt which is filed and accessible."*

FOD 91-3 Revised (4/95), Training Officer/Trainee Standards of Conduct, states:

*"Each unit commander will establish a work environment wherein no hazing or discourtesy shall occur. Moreover, all conditions of the **Training Officer-Trainee Principles** shall be followed."*

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Field Operations Regions, Trainee Informational Handout⁸, requires the trainee to sign this document and to acknowledge the following:

"I have received the following documents: 1) Trainee's Informational Handout 2) Training Officer - Trainee Principles."

Field Operations Directive 86-01 (Revised April 28, 2014), Training Records Retention – Field Training Program states:

"If a deputy fails to successfully complete the Field Training Program due to failure or hardship and transfers back to a non-patrol assignment, the applicable information shall be entered on the form, and the form will be placed in the training folder."

The files that contained all of the aforementioned documents in the specified directives met the standard for this objective.

Audit Procedures

The sampled FTP files were reviewed to determine whether the files contained the required documents.

Findings – Successful Completions

For successful completions of patrol training, 12 (20%) of the 59 FTP sample files met the standard for this objective.

Findings – Patrol Failures

For patrol failures, three (14%) of the 22 FTP files met the standard for this objective. Note that not all documents are required for those personnel who do not complete the program, however the "Patrol Failure Approval Form"⁹ is required.

Objective No. 1(c) Field Training Program Training Files - Completed Documents

Criteria

Field Operations Directive 86-01 (Revised April 28, 2014), states:

*"Field Training Program (FTP) training records are those documents outlined in the **Field Training Officer Manual** such as: the Standardized Evaluation Form, Training Checklist, Written Examinations, Quizzes, Performance Tests, Practice Reports and FTP Trainee Tracking Form (SH-AD 645)."*

⁸ The exact version of the Trainee Informational Handout was unable to be determined due to it not being dated.

⁹ The "Patrol Failure Approval Form" is an independently created form without an LASD official number designation.

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“...The tracking form shall be placed in the deputy’s training folder and kept updated throughout the Field Training Program. Upon successful completion of the Field Training Program, the completed tracking form shall remain in the training folder.”

Additionally, the FTPM, Section A: Management of the Field Training Program, Training Responsibilities, Master Field Training Officer/Administrator, states:

- *“Monitor each trainee’s progress by ensuring Daily Observation Reports and other documentation are received, reviewed and processed in a timely manner...”*
- *Review and sign Daily Observation Reports (**Appendix Five**) in a timely manner*
- *Review and sign End of Phase Evaluations (**Appendix Six**) in a timely manner...’*
- *[...]*
- *‘Ensure Field Training Officers and trainees read and sign Field Operations Directive 91-3, FTO/Trainee Standards of Conduct (**Appendix Two**)*
- *Provide trainees with Field Operations Regions Trainee Informational Handout (**Appendix Eight**) and ensure the trainee reads and signs it...”*

These bullet points indicate all required forms must be complete, with required information, signatures, and dates.

Audit Procedures

The FTP files were reviewed to determine whether the required documents were complete, including required information, signatures, and dates.

Findings

Twenty-eight (47%) of the 59 sampled FTP files pertaining to successful completions met the standard for this objective.

Seventeen (77%) of the 22 FTP files pertaining to patrol failures met the standard for this objective.

Objective No. 2 Personnel Files

Objective No. 2(a) Existence of a Field Training Program Personnel Files

Criteria

The APH, Miscellaneous Procedures, Personnel Folder, states:

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“An employee’s unit personnel file is an extension of the employee’s official personnel folder.”

Audit Procedure

Patrol units were visited to determine whether personnel files were present for sampled employees who successfully completed the program (successful completions).¹⁰

Detailed Findings

Each (100%) of the 59 Personnel files met the standard for this objective.

Objective No. 2(b) Field Training Program Personnel Files - Required Documents

Criteria

Field Operations Directive 86-01 (Revised April 28, 2014), Training Records-Field Training Program, states:

“(The F.T.P under the Advanced Officer Training Unit) training records documenting the progress and successful completion of patrol training shall be scanned and archived in the training record file when a trainee completes training. They shall not be placed in the trainee’s personnel file.”

The FTPM specifies documenting formal releases from training using the Department Office Correspondence form (SH-AD-32A). Some units provided a formal release from training using another memorandum form that was signed by the Captain. For the purposes of this audit, both methods were accepted as meeting the criteria. However, some units provided a formal release from training in the form of an e-mail which did not meet the criteria for this objective.

Audit Procedures

The sampled personnel files were reviewed to determine whether the files contained the required training program documents. The files that had all of the documents met the standard for this objective.

Detailed Findings

Seventeen (29%) of the 59 sampled personnel files met the standard for the objective.

¹⁰ This objective did not address patrol failures because patrol units do not maintain files for personnel who failed the program.

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Objective No. 2(c) Field Training Program Personnel File – Completed Documents

The Field Operations Directive 86-01 (Revised April 28, 2014), states:

“The only three documents of training information that shall be permanently retained in a trainee’s personnel file at the time the employee completes training are the:

- *Training Summary,*
- *Final off-training evaluation*
- *Formal release from training memorandum from the station Captain.”*

Additionally, the FTPM, Section A: Management of the FTP, Training Responsibilities, Master Field Training Officer/Administrator, states:

- *“Monitor each trainee’s progress by ensuring Daily Observation Reports and other documentation are received, reviewed and processed in a timely manner...*
- *Review and sign Daily Observation Reports (**Appendix Five**) in a timely manner*
- *Review and sign End of Phase Evaluations (**Appendix Six**) in a timely manner...’*
- *[...]*
- *‘Ensure Field Training Officers and trainees read and sign Field Operations Directive 91-3, Field Training Officer/Trainee Standards of Conduct (**Appendix Two**)*
- *Provide trainees with Field Operations Regions Trainee Informational Handout (**Appendix Eight**) and ensure the trainee reads and signs it...”*

These bullet points indicate all required forms must be complete, with required information, signatures, and dates.

Audit Procedures

The above documents were evaluated to determine whether they were completed with required information, signatures, and dates.

Findings

Seventeen (29%) of the 59 sampled personnel files met the standard for this objective.

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Objective No. 3 File Storage

Objective No. 3(a) Restricted Access/Secured Storage of Field Training Program Files

Criteria

FOD 86-1, Revision November 27, 1991, Training Records Retention – Field Training Program, states:

“...all other Field Training Program training records shall be securely stored for two years. At the end of the two (2) year period all of these records shall be destroyed.”

Additionally, the Field Operations Directive 86-01 (Revised April 28, 2014), states:

“...all other Field Training Program training records shall be scanned and archived.”

Audit Procedures

The FTP successful completion training files were reviewed to determine whether they were securely and electronically stored (i.e. locked cabinet, locked office, limited access through layers of security, etc.¹¹). Files that were secured by either means, met the standard for this objective.

Findings

All (100%) of the 59 sampled FTP files pertaining to successful completions met the standard for this objective.

All (100%) of the 22 FTP files relating to patrol failures met the standard for this objective.

Objective No. 3(b) Restricted Access/Secured Storage of Personnel Files

Criteria

The MPP, Section 3-02/020.10, Personnel Folders, states,

“...These records are restricted and are made available to the individual employee to persons who provide written authorization from the employee (i.e., a waiver to review personnel records) and to authorized personnel only with the

¹¹ Although a specific method is not articulated in policy, examples are listed.

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consent of the Director of Personnel Administration. Confidential information about an employee which was obtained during the background investigation will not be open to review by the concerned employee.”

The APH, Miscellaneous Procedures, Personnel Folder, states:

“An employee’s unit personnel file is an extension of the employee’s official personnel folder. These records are restricted and confidential.”

Audit Procedures

Auditors visited FTP units to determine if access to personnel files or folders were restricted by using a locked cabinet, a locked room, or other secure means.¹²

Findings

All (100%) of the 59 Personnel files sampled met the standard for this objective.

Objective No. 4 Supervisor/Administrator/Coordinator Training

Criteria

The California Peace Officer Standards and Training (POST) Administrative Manual, Section B, Regulation 1004, Field Training Program, (c) Field Training Supervisor/Administrator/Coordinator (SAC) Training Requirement, states:

“Every peace officer promoted, appointed, or transferred to a supervisory or management position overseeing a field training program shall successfully complete a POST-certified Field Training Supervisor/Administrator/Coordinator (SAC) Course (as set forth in PAM Section D-13)...”

Audit Procedures

Training files were reviewed to determine if the designated unit FTP Supervisor, Administrator, and/or Coordinator had attended the POST-certified Field Training Program Supervisor/Administrator/Coordinator Course within 12 months of appointment to the position.

During data collection for this objective, three SACs stated they had been through the training in September 2012, but could not produce evidence to support their training. The Department Learning Management System and Training Record System were both searched, but found no supporting evidence. However, the audit manager attended the

¹² This objective did not address patrol failures because patrol units do not maintain files for personnel who failed the program.

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SAC Course 09/19/2012, and verified the representatives for Pico Rivera station (MFTO), West Hollywood station (MFTO), and East Los Angeles station (training sergeant) had attended/successfully completed the same course.

Findings

Seventeen (71%) of the 24 FTP supervisor, administrator and/or coordinator population met the standard for this objective.

Other Related Matters

Conflicting Policies and Directives

Inconsistency and conflict of direction articulated in the various Department policies and directives created a significant variable impact on the findings related to Objective No.1 and Objective No. 2.

The initial conflict relates to *FOD 86-1, Revision November 27, 1991, Training Records Retention – Field Training Program*; and the *Field Operations Directive 86-01 (Revised April 28, 2014)*. As noted in the Background section of this audit, *FOD 86-1 (Revision November 27, 1991)*; and *FTPM, Field Operations Directive (April 28, 2014)* are both valid active directives according to the Department's Field Operations Support Services (FOSS).

According to FOSS, the content articulated in *Field Operations Directive 86-01 (Revised April 28, 2014)* is currently in the process of being incorporated into the general language of procedures within the FTPM and the title "Field Operations Directive" will be removed. Upon incorporation of this content, *FOD 86-1 (Revision November 27, 1991)* will be revised or rescinded. To date, those revisions have not been completed.

Another conflict within both directives is the requirements of maintaining the *FTP Trainee Tracking Form (SH-AD 645)*. *FOD 86-10, Revised October 6, 1986, Deputy Orientation Tracking System* articulates the required use of the *FTP Trainee Tracking Form (SH-AD 645)* within the FTP. However, the *FTP Trainee Tracking Form (SH-AD 645)* is no longer an active form and cannot be found in the Department's form library. As a result, the individual FTP units created variations of this form for the purposes of fulfilling this function and requirement.

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Although the FTP units were aware of the above directives, variations of forms were consistently identified throughout the scope of this audit. The following documents were found to have one or more versions in active use.

- Training Summary
- FOD 91-3 Training Officer/Trainee Standards of Conduct
- Field Training Officer Guidelines
- Formal Release from Training Memorandum (Captain to Trainee)

The table below documents the inconsistent variation of required documents as noted in each directive.

Table No. 2 – Required Documents by Directive

	<u>Directives Identifying Required Documents</u>				
	<u>FOD 86-10</u>	<u>FOD 86-1 (Rev 1991)</u>	<u>FOD 86-01 (Rev 04/14)</u>	<u>FOD 91-3</u>	<u>FTP Section A Management of the FTP</u>
Tracking Form (SH-AD 645)	X	X	X		
Training Summary		X	X		
Final Off Training Evaluation		X	X		
Formal Release Memorandum		X	X		
FOD 91-3		X		X	X
Field Operations Regions Informational Handout		X			X

Lastly, the following discrepancies were discovered during a review of the FTPM

- *Field Operations Directive 86-01 (Revised April 28, 2014)* references the *Field Training Officer Manual* which could not be located by auditors. Per discussions with Master Field Training Officers (MFTO), they are unaware of such manual and the directive may be referring to the FTPM.
- The *FTPM, Section A; Management of the Field Training Program, Training Responsibilities*, specifically makes reference to appendices two through eight; however the appendices within the manual are not labeled as such.
- The *FTPM, Section A; Management of the Field Training Program, Training Responsibilities, Station Captains*, specifically and incorrectly references FOD 93-3 which is entitled Extraction/Escort Mission. The correct directive reference is FOD 91-3, Trainee Officer/Trainee Standards of Conduct.

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Storage of Files Conflict

Conflicts with directives and policies were identified when evaluating the storage of FTP and Personnel files (Objective No. 3).

FOD 86-1, Revision November 27, 1991, Training Records Retention – Field Training Program indicates the files are to be held for two years beyond the completion of the Patrol FTP and then may be destroyed. The *Field Operations Directive 86-01 (Revised April 28, 2014)* states the files will be electronically scanned and archived for permanent preservation.

Although there are conflicting directives and policies, all units securely stored files by one or more methods. During this audit, two of the 18 sampled units (of a total population of 23 units¹³) were employing a digital archive system for their FTP files.

VIEWS OF RESPONSIBLE OFFICIALS¹⁴

The Advanced Officer Training (AOT) FTP Coordinator reviewed the findings, audit process, and audit material. During the meeting, the AOT coordinator verbally validated the audit findings, and acknowledged the conflicts among the various Department policies and directives pertaining to the FTP. Additionally, he added that the inconsistencies in directives have been discussed amongst the Department FTP managers, AOT staff and the MFTOs.

In interacting with FTP managers during this audit, several indicated they do not share a common command. As a result, they often receive conflicting direction from their supervisors, executives, and others regarding the management of the FTP.

CONCLUSION

The AAB did identify favorable risk mitigating efforts in managing and retaining files/documents related to the FTP which were attributed to the training sergeants, MFTOs and AOT Field Training Coordinator. However, the technical AAB findings of inconsistencies in the documentation of the FTP are a result of: non-uniformed identifiable documents; inconsistent policies; and inconsistent administrative procedures.

Through the audit process, the AAB also identified inconsistencies in the practices related to management of the FTP that attributed to the technical findings above. The AAB identified: a lack of independent oversight responsibilities; a fragmented administrative FTP management system; an overloaded span of control for the AOT

¹³ Five units were deselected from the total population due to not having file samples within the audit scope and/or not selected in the sample randomizer.

¹⁴ Government Auditing Standards, Chapter 7, Section 7.32 states: "Auditors should obtain and report the views of responsible officials of the audited entity concerning the findings, conclusions, and recommendations included in the audit report, as well as any planned corrective actions."

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Field Training Coordinator; inconsistent practices of timely document collection from FTOs; and an inconsistent priority identification of non-Field Training Program collateral duties of the Training Bureau staff and MFTOs that have taken time away from the primary management responsibilities of the FTP.

RECOMMENDATIONS

1. It is recommended that FOSS and the Training Bureau reevaluate and revise policies and directives to provide consistency and clarity in the management of the FTP files, including standardized FTP documents to establish consistency in the process.
2. It is recommended that the Training Bureau implement a standardized document and file tracking system to improve consistency and centralized management of the program records.
3. It is recommended Training Bureau coordinate an annual FTP POST-certified Supervisor/Administrator/Coordinator Course to ensure all FTP supervisors, administrators, and/or coordinators are current in compliance with POST directives.
4. It is recommended the Department improve coordination of MFTOs and the AOT Field Training Coordinator responsibilities to standardize documentation, ensure overall program efficiency, consistency, oversight, and accountability in accordance with the importance of the training objectives.