

LOS ANGELES POLICE COMMISSION

***REVIEW OF AUDIT DIVISION'S
NON-CATEGORICAL USE OF FORCE
REPORTS AUDIT***



Conducted by

OFFICE OF THE INSPECTOR GENERAL

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EXECUTIVE SUMMARY
Office of the Inspector General
Review of Audit Division’s Non-Categorical Use of Force Reports Audit

OVERVIEW OF AUDIT DIVISION’S AUDIT

According to the Non-Categorical Use of Force Reports Audit report (Audit Report), the purpose of Audit Division’s Non-Categorical Use of Force Reports Audit (Audit) was to assess the Los Angeles Police Department’s (Department) compliance with Consent Decree paragraphs 65, 68, 69, 80(c), 80(e), 80(f), 82, 128, 129 and 131(a). In order to address the requirements of Consent Decree paragraph 131(a), Audit Division separated out the NCUOF investigations involving officers assigned to gang units (GED) into a separate stratum from those that did not involve officers assigned to gang units (Non-GED). The table below summarizes the compliance percentages reported by Audit Division.

CD ¶	SUBJECT	NON-GED COMPLIANCE PERCENTAGE	GED COMPLIANCE PERCENTAGE
128	Evaluation for Completeness	100	100
128	Evaluation for Authenticity	98	100
128	Evaluation of Underlying Actions	98	100
128	Evaluation of On-Scene Supervision	90	100
128	Evaluation of Post Incident Review	100	100
69	Evaluation for Timeliness of the Investigation	100	100
129(a), 68	Evaluation for Timeliness of the Review	99	100
129(b)	Completeness of Evidence Documentation	99	92
129(c)	Investigator’s Representation of Statements	68	100
80(c)	Prohibiting Group Interviews	97	100
80(e)	Interviewing All At-Scene Supervisors	97	100
80(f)	Canvassing the Scene/Interview Witnesses/Collect and Preserve Evidence	99	100
129(b)	Tape Record All Level I Interviews	100	100
82	Reporting Allegations of Misconduct	98	100
129(d)	Other Investigative Issues	95	100

Audit Division identified the “Investigator’s Representation of Statements” as the most significant risk issue discovered in the course of the Audit. Audit Division found that there was a substantial number of Non-GED investigations in which the investigating supervisor either misrepresented a witness’ statement or failed to identify an inconsistency between statements. The failure of investigating supervisors to properly summarize statements and/or to identify inconsistencies hampers the ability of the Department to properly adjudicate these incidents. The OIG agrees with Audit Division’s assessment of this issue and plans to address this issue in its own Non-Categorical Use of Force Audit to be conducted in the current fiscal year.

OVERVIEW OF OIG'S REVIEW

Pursuant to Consent Decree paragraph 135, the Office of the Inspector General (OIG) reviewed Audit Division's Non-Categorical Use of Force Reports Audit. The review found that overall the Audit was conducted in a quality manner and the reported findings were generally properly supported and presented.

The OIG noted one issue with the completeness of the Audit. The OIG found that Audit Division addressed all of the Consent Decree paragraphs it set out to except for paragraph 65. The OIG acknowledges that there are concerns with the resources that would be needed to assess this paragraph. However, since Audit Division indicated this paragraph was to be covered by this Audit, an explanation for the lack of testwork specifically designed to address this paragraph should have been included in the Audit Report.

The two most significant issues identified by the OIG in the review of this Audit pertain to the Evaluation of Post-Incident Supervisory Reviews. These issues are as follows:

- Commanding Officers are required to check the box on the Non-Categorical Use of Force Internal Process Report (IPR) to verify that they reviewed the involved officer's use of force history. Audit Division identified seven Non-GED investigations and one GED investigation that contain at least one IPR for which the Commanding Officer failed to check the required box. The OIG identified one additional GED investigation with the same such omission. Audit Division did not identify these anomalies in the Audit Report or include them in the calculation of their Post-Incident Supervisory Reviews compliance percentages. The OIG noted that this is the only means by which to verify that the reviewing Commanding Officer reviewed the involved officer's history. As such, these anomalies should have been identified in the Audit Report and used in the calculation of the compliance percentage for Post-Incident Supervisory Reviews.
- The supervisors assigned to investigate non-categorical uses of force are prohibited from approving reports related to that use of force. The Audit Report contains an analysis of this issue in a "Discussion" section. This section details the number of investigations in which Audit Division found that reports related to the use of force had been approved by the investigating supervisor. These anomalies are not included in the calculation of the compliance percentage for Post-Incident Supervisory Reviews. The OIG found that a substantial number of the improperly approved related reports include significant details of the incident. Thus, the OIG found that these anomalies should have been used in the calculation of the compliance percentage for Post-Incident Supervisory Reviews.

**OFFICE OF THE INSPECTOR GENERAL
REVIEW OF AUDIT DIVISION'S
NON-CATEGORICAL USE OF FORCE REPORTS AUDIT**

PURPOSE

Pursuant to Consent Decree paragraph 135, the Office of the Inspector General (OIG) reviewed Audit Division's Non-Categorical Use of Force Reports Audit (Audit). This Audit was completed in the fourth quarter of Fiscal Year 2004/2005 and received by the OIG on July 1, 2005. As required, the OIG assessed this Audit's completeness, findings and quality.

BACKGROUND ON AUDIT DIVISION'S AUDIT

According to the Non-Categorical Use of Force Reports Audit report (Audit Report), the purpose of the Audit was to assess the Los Angeles Police Department's (Department) compliance with Consent Decree paragraphs 65, 68, 69, 80(c), 80(e), 80(f), 82, 128, 129 and 131(a). In order to conduct their assessment, Audit Division developed a compilation of 58 detailed questions (Matrix) relating to the above listed Consent Decree paragraphs and other related matters. Audit Division used their Matrix to evaluate the investigations of the Non-Categorical Use of Force (NCUOF) incidents that occurred in the month of November 2004. In order to address the requirements of Consent Decree paragraph 131(a), Audit Division separated out the NCUOF investigations involving officers assigned to gang units (GED) into a separate stratum from those that did not involve officers assigned to gang units (Non-GED). Audit Division identified 111 Non-GED and 13 GED NCUOF incidents that occurred in November 2004.

Audit Division detailed the results of the Audit in the Audit Report. The Audit Report identifies the "Investigator's Representation of Statements" as the most significant risk discovered in the course of the Audit. Audit Division found that there was a substantial number of Non-GED investigations in which the investigating supervisor either misrepresented a witness's statement or failed to identify an inconsistency between statements. Special Order No. 13 provides specific requirements for the handling of witness statements. When inconsistencies between statements are substantial, the incident is required to be classified as a Level I incident. This classification triggers the implementation of procedures designed to more thoroughly document the details of the incident and the witness statements. The failure of investigating supervisors to properly summarize statements and/or to identify inconsistencies hampers the ability of the Department to properly adjudicate these incidents.

The OIG agrees with Audit Division's conclusion that the failure of investigating supervisors to accurately represent witness statements or identify inconsistencies between statements poses a significant risk. The OIG plans to conduct its own Non-Categorical Use of Force Audit during Fiscal Year 2005-2006. Based on Audit Division's finding, the OIG will specifically address this issue in its audit.

The table below summarizes the compliance percentages reported in the Audit Report.

CD ¶	SUBJECT	NON-GED COMPLIANCE PERCENTAGE	GED COMPLIANCE PERCENTAGE
128	Evaluation for Completeness	100	100
128	Evaluation for Authenticity	98	100
128	Evaluation of Underlying Actions	98	100
128	Evaluation of On-Scene Supervision	90	100
128	Evaluation of Post Incident Review	100	100
69	Evaluation for Timeliness of the Investigation	100	100
129(a), 68	Evaluation for Timeliness of the Review	99	100
129(b)	Completeness of Evidence Documentation	99	92
129(c)	Investigator's Representation of Statements	68	100
80(c)	Prohibiting Group Interviews	97	100
80(e)	Interviewing All At-Scene Supervisors	97	100
80(f)	Canvassing the Scene/Interview Witnesses/Collect and Preserve Evidence	99	100
129(b)	Tape Record All Level I Interviews	100	100
82	Reporting Allegations of Misconduct	98	100
129(d)	Other Investigative Issues	95	100

In the course of its review, the OIG identified issues with four of the subject matters listed in the table above that call the accuracy of the reported compliance percentages into question. These four subject matters are the "Evaluation of On-Scene Supervision" for Non-GED investigations; the "Evaluation of Post Incident Review" for both Non-GED and GED investigations; and the "Interviewing All At-Scene Supervisors" for Non-GED investigations. The issues identified by the OIG are detailed in this report.

Greater detail of Audit Division's methodology and findings can be found in the Audit Report.

Special Order No. 13

In May 2004, the Department issued Special Order No. 13 that substantially changed the Department's policies regarding the investigations of NCUOF incidents. Special Order No. 13 provides for the classification of NCUOF incidents as either Level I or Level II incidents. If a NCUOF is a Level I incident, then all interviews of the subject of the use of force and of non-Department employee witnesses must be tape recorded, the investigating supervisor must provide a brief Incident Overview, and the narrative part of the NCUOF Report must include a Witness Statements section.

Of the 111 Non-GED investigations reviewed by Audit Division, 11 were classified by the Department as Level I incidents. Audit Division identified four incidents that were classified by the Department as Level II incidents that should have been classified as Level I incidents, and

one Level I incident that was identified on the face sheet of the NCUOF Report as a Level I incident but properly treated by the Department as a Level II incident.

Of the 13 GED investigations reviewed by Audit Division, two were properly classified by the Department as Level I incidents.

BACKGROUND ON THE OIG'S AUDIT SECTION

As previously reported, the OIG hired a third Assistant Inspector General (AIG) and a Police Performance Auditor IV (PPA IV) in March and May 2005, respectively. Both the AIG and the PPA IV were assigned to Audit Division prior to accepting their positions with the OIG. Normally, the AIG and the PPA IV would refrain from conducting reviews of Audit Division audits for a certain period of time, however; as the Consent Decree requires the OIG to conduct these reviews, that luxury is not available. Nonetheless, the AIG and PPA IV have refrained from conducting or supervising any reviews of Audit Division audits that they actively participated on while assigned to Audit Division.¹

PRIOR RECOMMENDATIONS

The OIG has not made any independent recommendations relating to NCUOF investigations since Special Order No. 13 was issued.

REVIEW METHODOLOGY

The OIG assessed the completeness, findings, and quality of Audit Division's Non-Categorical Use of Force Reports Audit by reviewing the Audit Report, related audit plan, Matrix, supporting work papers and source documents.² The OIG reviewed 25 of the 111 Non-GED investigations and 10 of the 13 GED investigations audited by Audit Division. The OIG compared Audit Division's response to the Matrix questions with the supporting documents for each of the investigations the OIG reviewed, and then attempted to trace all anomalies to Audit Division's final Audit Report.

To verify that Audit Division properly identified all NCUOF incidents that occurred in November 2004, the OIG reviewed Use of Force Review Division's list of NCUOF incidents that occurred in November 2004. The OIG also reviewed copies of Area/Division time books, and Watch Commander's and Sergeant's Daily Reports.

¹ Neither the AIG nor the PPA IV were involved in this audit while they were employees at Audit Division.

² The OIG's review of supporting work papers was based on a randomly selected one-tail sample size calculation with a 95 percent confidence level, an expected error rate of six percent, and a plus-precision of seven percent.

On September 27, 2005, the OIG met with Audit Division management to discuss the results of this review. At that time, Audit Division management indicated general agreement with most of the findings in this report.

REVIEW RESULTS

COMPLETENESS

To assess the completeness of the NCUOF Reports Audit, the OIG reviewed the Audit Report and supporting work papers to ensure that Consent Decree mandates were addressed and that all of the investigations fitting Audit Division's criteria were included in the Audit.

Consent Decree Mandates Addressed

Per the Department's Revised Annual Audit Plan, Audit Division's Non-Categorical Use of Force Reports Audit was to assess Consent Decree paragraphs 65, 68, 69, 80(c), 80(e), 80(f), 82, 128, 129, and 131(a). The OIG's review found that all but paragraph 65 were covered in this Audit. Consent Decree paragraph 65 states, "The Department shall continue to require officers to report to the LAPD without delay the officer's own use of force (on the use of force form as revised pursuant to paragraph 66)." Audit Division did not explain in the Audit Report why this paragraph was not addressed. This issue was communicated to Audit Division. Audit Division explained that in the course of their Audit, they did watch for uses of force that were unreported. However, the Federal Monitor and the Consent Decree Work Group previously determined that the testwork that would be required to test for compliance with this paragraph would entail resources not available to Audit Division. The OIG acknowledges this fact. However, since this paragraph was included in the Annual Audit Plan and the detailed Audit Plan for this Audit and it was mentioned at the beginning of the Audit Report, the explanation for not conducting any testwork specifically designed to address this paragraph should have been included in the Audit Report.

Identification of a Complete Population

Audit Division chose to review all NCUOF incidents that occurred during the month of November 2004 to assess the Department's compliance with relevant Consent Decree paragraphs and Department policies. These incidents were separated into GED and Non-GED incidents based on the assignment of the involved officer(s). There were 111 Non-GED incidents and 13 GED incidents that occurred in November 2004. The OIG found Audit Division's efforts to ensure that all incidents fitting their criteria (occurred in November 2004) to be well thought out and extensive. The OIG commends Audit Division for embarking on such a considerable undertaking.

Conclusion

The OIG found that Audit Division went to great lengths to ensure that their population was complete. Audit Division properly separated the Non-GED and GED investigations to assess Consent Decree paragraph 131(a). The only completeness issue identified by the OIG was Audit Division's failure to provide an explanation in the Audit Report for not conducting any testwork specifically designed to address Consent decree paragraph 65.

FINDINGS

To assess the Audit's findings, the OIG reviewed Audit Division's supporting source documents, answers to Matrix questions and Matrix summary reports. The OIG also reconciled the Matrix summary reports with the Audit Report to ensure that the findings were properly represented in the Audit Report. As a result of the review, the OIG identified some errors and omissions in the Audit Report's Findings.

Support for Findings

The following are the details of the issues with which the OIG found it disagrees with the Findings as described in the Audit Report:

Evaluation of On-Scene Supervision of the Incident (Consent Decree ¶128)

The Audit Report noted that there were three Non-GED incidents in which medical treatment was not obtained for the involved suspects.³ These three incidents were found to be out of compliance with Department policy with regard to On-Scene Supervision. However, the OIG noted that there were no supervisors on-scene at the time of these three incidents. This issue was communicated to Audit Division. Audit Division acknowledged that this issue would be more appropriately classified as a Post-Incident Supervisory Review issue.

Evaluation of Post-Incident Supervisory Reviews (Consent Decree ¶128)

The Audit Report indicates that the post-incident supervisory reviews of all Non-GED and GED investigations were thorough and met the quality requirements. However, in addition to the on-scene supervision issue explained above, the OIG noted the following issues with regard to post-incident reviews:

- **Review of Officer's Use of Force History**

One of the Matrix questions designed to assess post-incident supervisory reviews asks whether the Commanding Officer checked the box on the Non-Categorical Use of Force

³ NCUOF Nos. 054083, 054170, and 054325

Internal Process Report (IPR) indicating that the Commanding Officer reviewed the officer's use of force history. Audit Division's responses to this question indicate that there were seven Non-GED investigations and one GED investigation for which the Commanding Officers failed to check the box as required.⁴ These anomalies were not included in Audit Division's analysis of post-incident supervisory reviews. In addition, the OIG noted one additional GED investigation (NCUOF No. 054272) for which Audit Division initially indicated that the Commanding Officer had checked the required box, when, in fact, the investigation included an IPR for which the required box was not checked.

The OIG communicated these issues to Audit Division. Audit Division agrees that the required box was not checked on the IPR for one of the officers involved in NCUOF No. 054272, but asserted that the anomalies represent only minor administrative oversights as opposed to reportable Consent Decree compliance issues. However, Audit Division did communicate these anomalies to the Office of Operations for follow up.

The OIG acknowledges that there are no Consent Decree paragraphs that specifically require Commanding Officers to check the box on the IPR indicating that they reviewed the involved officer's use of force history. However, there is such a requirement contained in Special Order No. 13 and there is no other means by which to verify that the Commanding Officer has reviewed the involved officer's use of force history. Thus, since Audit Division set out to report on the Department's post-incident review and checking the box on the IPR is part of the post-incident review, the identified anomalies should have been communicated in the Audit Report and should have been used in the calculation of the Department's compliance percentage.

- Approval of Related Reports

An evaluation of the Department's compliance with the policy that prohibits investigating supervisors from approving related reports is contained in a separate "Discussion" section of the Audit Report.⁵ It was noted that the Department failed to comply with this policy in 23 Non-GED investigations and three GED investigations. The OIG found that this assessment should have been included in the overall compliance percentage for post-incident review. The OIG communicated this issue to Audit Division. Audit Division reasoned that prior to Special Order No. 13, the policy was that all related reports were required to be approved by the investigating supervisor, and that only six months had elapsed between the time Special Order No. 13 was issued and the time period chosen for the Audit. Audit Division further reasoned that the restriction on approving related reports was not a Consent Decree compliance issue. The OIG acknowledges that there are no Consent Decree paragraphs that specifically prohibit investigating supervisors from approving reports related to the NCUOF. However, there is a Department policy to that effect and it is a part of the post-incident

⁴ The seven Non-GED investigations are NCUOF Nos. 054043, 054105, 054151, 054192, 054267, 054448 and 054468. The one GED investigation is NCUOF No. 054345.

⁵ The most common "related reports" are Arrest Report, Employee's Report, Preliminary Investigation report and Follow-up Investigation report.

review. The OIG noted that of the investigation packages that contain related reports that were improperly approved, a substantial number of the improperly approved related reports include significant details of the incident.⁶ Thus, since Audit Division set out to report on the Department's post-incident review and a majority of the improperly approved reports contain significant details of the incident, these anomalies should have been communicated in the Audit Report and should have been used in the calculation of the Department's compliance percentage.

Interviewing of All At-Scene Supervisors (Consent Decree ¶80(f))

The Audit Report indicates that there were 29 Non-GED investigations reviewed by Audit Division in which supervisors witnessed, directed or participated in the NCUOF. However, the OIG determined that there were actually 28 such investigations. This issue was communicated to Audit Division, and Audit Division agrees with this determination.

Presentation of Findings

The OIG reconciled the compliance percentages reported in the body of the Audit Report with those listed in Table No. 1 of the Audit Report. The OIG did not note any discrepancies as a result of this reconciliation.

Conclusion

Overall, Audit Division conducted a thorough analysis of the NCUOF investigations it audited, and had well-supported findings. Audit Division reported on a total of 15 different aspects of both Non-GED and GED investigations. The OIG identified issues relative to three aspects of the Non-GED investigations and one aspect of the GED investigations. Audits of this type take a substantial amount of time and expertise to conduct. Audit Division appears to have applied an appropriate amount of both of these elements to this Audit.

QUALITY

The OIG evaluated both the Audit and Audit Report for quality.

Audit Quality

In order to assess the quality of this Audit, the OIG reconciled the Matrix questions utilized with the mandates purported to be addressed by the questions. As previously indicated, Audit Division developed a 58-question Matrix with which to assess the Department's compliance with mandates concerning NCUOF investigations. The Matrix questions are detailed and provide

⁶ Of the 23 Non-GED investigations that contain related reports that were improperly approved, 15 contained related reports that include significant details of the incident. Of the three GED investigations that contain related reports that were improperly approved, two contain related reports that include significant details of the incident.

appropriate response choices. The OIG noted only one additional question that could enhance the Matrix. According to Special Order No. 13, there are circumstances under which a *witnessing* supervisor may be assigned to conduct the NCUOF investigation. However, an *involved* supervisor may not ever be assigned to conduct the NCUOF investigation. Audit Division's Matrix includes a question regarding investigating supervisors who *witnessed* the NCUOF, however, there are no questions contained in the Matrix that would address an incident in which the investigating supervisor was *involved* in the incident.

Report Quality

The Audit Report delineated the Audit's objectives, scope, methodology and the status of prior audit recommendations. The Audit Report used a fair and unbiased tone, and was found to be concise. However, the OIG noted the following weaknesses in the quality of the report:

Evaluation of the Timeliness of the Investigation

The Audit Report indicates that all of the Non-GED and GED investigations were investigated in a timely fashion pursuant to Consent Decree paragraphs 68, 128 and 129(a). However, it is not clear in the Audit Report what criteria was used to determine timeliness of the investigations. This issue was communicated to Audit Division. Audit Division indicated that they used multiple criteria to assess the Department's compliance with the requirement that the investigation be conducted in a timely fashion. These criteria include the same 14-day criteria used to evaluate the timeliness of the review of the investigation and the length of time it took the investigating supervisor to respond to the scene. Although the OIG finds the criteria used by Audit Division for this assessment to be sound, the OIG would have preferred that the details of the criteria used had been included in the Audit Report.

Report Clarity

The OIG noted details that could have been included in the Audit Report that would have put the reported findings into better perspective. These details are as follows:

- The Audit Report indicates that 23 Non-GED investigations include related reports that were inappropriately approved by the investigating supervisor. The Audit Report does not detail the fact that this issue was identified in the Department's own review of five of these 23 investigations.
- The Audit Report indicates that only one Non-GED investigation and one GED investigation were missing tapes of relevant interviews. The Audit Report does not detail how many Non-GED and GED investigations contained tapes.
- The Audit Report indicates that there were two Non-GED and no GED investigations for which misconduct was not properly reported. The Audit Report does not detail the total number of Non-GED and GED investigations that involved allegations of misconduct.
- The Audit Report indicates that all Non-GED investigations contained photographs of the suspects' injuries. The Audit Report does not detail the fact that there was one Non-GED

investigation for which Audit Division was unable to determine whether photos of all of the suspect's injuries were taken.

Conclusion

Overall, the OIG determined that the Audit and the Audit Report were of good quality, but could have been improved with some slight adjustments.

OTHER MATTERS

Instructions for Completion of NCUOF Report for Level II Incidents

According to Special Order No. 13, if there are no significant inconsistencies, the investigating supervisor *shall* include a statement in the NCUOF Report indicating that the description of the incident as depicted in the related reports is consistent with the statements of *non-Department* employee witnesses. Similarly, if there are no significant inconsistencies, the investigating supervisor *should* include a statement in the NCUOF Report indicating that the description of the incident as depicted in the related reports is consistent with the statements of *Department* employee witnesses. Although these instructions apply to both Level I and Level II incidents, they are contained within the section of Special Order No. 13 that discusses Level I incidents. Of the 25 Non-GED investigations reviewed by the OIG, the OIG found 17 investigations to have compliance issues with these requirements. Of the 10 GED investigations reviewed by the OIG, the OIG found six investigations to have compliance issues with these requirements.

Instructions for the preparation of an attached narrative are contained on page number 3 of the NCUOF Report (Form 1.67.05, Revised 5/04). The instructions for a Level II investigation only include an instruction regarding documenting discrepancies between witness statements, if any. The OIG believes it would be helpful for investigating supervisors if instructions were added regarding documenting that witnessing Department and non-Department employee statements are consistent with the incident as depicted in the related report(s).

Authorization for the Release of Medical Information

Of the 35 NCUOF investigations reviewed by the OIG (25 Non-GED investigations and 10 GED investigations), 20 of them contained an Authorization for the Release of Medical Information (Authorization). However, the Authorization forms used were not consistent.⁷ Some of the forms include a line for the date the form was signed in the signature block and some do not

⁷ Each of the Authorizations identifies both the name of the Mayor and the Chief of Police at the top of the form. Fifteen of the forms did identify Hahn/Bratton as the Mayor/Chief. However, two forms identify Hahn/Parks as the Mayor/Chief, one form identifies Hahn/Pomeroy as the Mayor/Chief, and two forms identify Riordan/Parks as the Mayor/Chief.

include such a line.⁸ The OIG's concern regarding the line for the date the form was signed stems from the fact that all of the forms specifically state that the "authorization shall remain valid for one year *from the date it is signed . . .*" If there is no date on the form, it becomes difficult to determine when the Authorization expires.

Special Order No. 23 dated September 16, 2005, revises the Authorization to Release Medical Information form. This revised form contains a specific field for the date on which the form will expire. This field addresses the OIG's concern.

RECOMMENDATIONS

The OIG recommends that the Department:

1. Consider revising the instructions contained on the NCUOF Report for Level II investigations to clarify the requirements regarding documenting the lack of inconsistencies between witnessing Department and non-Department employee statements and the details of the incident as depicted in the related report(s).
2. Ensure that the aforementioned revised Authorization to Release Medical Information form is properly distributed to all Areas/Divisions, and that all prior versions are taken out of circulation.

⁸ The forms that identify Hahn/Parks and Hahn/Pomeroy as the Mayor/Chief contain a signature block that includes a line for the date the form was signed. The forms that identify Hahn/Bratton and Riordan/Parks as the Mayor/Chief do not contain a line for the date the form was signed.