

LOS ANGELES POLICE COMMISSION

**REVIEW OF THE DEPARTMENT'S  
STANDARDS BASED ASSESSMENT  
INSPECTION –  
LIEUTENANTS AND BELOW**



Conducted by the

**OFFICE OF THE INSPECTOR GENERAL**

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FISCAL YEAR 2009/2010**

**PURPOSE OF REVIEW**

The Office of the Inspector General (OIG), pursuant to its Annual Audit and Review Plan, reviewed the Los Angeles Police Department's (Department) Standards Based Assessment Inspection - Lieutenants and Below (Inspection). This Inspection was completed by Internal Audits and Inspections Division (IAID) in the fourth quarter of Fiscal Year 2009/2010 and approved by the Board of Police Commissioners on July 20, 2010. The OIG's review assessed the completeness, quality, and findings of the Inspection.

**BACKGROUND ON THE STANDARDS BASED ASSESSMENT FORM AND PROCESS**

According to LAPD Manual Section Volume 1, section 665.30, "*The vitality of the Department is maintained through the selection and promotion of the most qualified personnel to positions of increased responsibility. The Department must help in the selection process by accurately rating and evaluating employees and candidates for promotion and by advancing the most qualified.*"

The Standards Based Assessment (SBA) form is the Department's means by which the performance of a sworn officer at the rank of lieutenant or below is annually evaluated based on the employee's date-to-rank anniversary.<sup>1</sup> The SBA for non-supervisors evaluates the following six areas of performance: (1) Skills Required to Perform Current Assignment, (2) Initiative and Productivity, (3) Communication, (4) Personal Interactions, (5) Integrity, and (6) Acceptance of Responsibility.<sup>2</sup>

The SBA for supervisors additionally evaluates the following four areas: (1) Development of Subordinates, (2) Supervisory Administrative Skills, (3) Use of Force and Personnel Complaint Investigation Skills, and (4) Civil Rights Oversight of Field Operations. Likewise, the SBA for field training officers additionally evaluates the following three areas: (1) Annual Refresher Training, (2) Observing and Evaluating Performance, and (3) Training Officer Administrative Skills.

Each of the aforementioned performance areas has two or three sub-areas, with each sub-area assigned a rating of: (1) *Meets or Sometimes Exceeds Standards*, (2) *Greatly Exceeds Standards*, or (3) *Needs Improvement*. No documentation is required to support a *Meets or Sometimes Exceeds Standards* rating. However, documentation is required to support a *Greatly Exceeds Standards* or *Needs Improvement* rating. This documentation includes Major Commendations, Minor Commendations, Comment Sheets, Notices to Correct Deficiencies, and Complaint Forms.<sup>3</sup>

At a minimum, an SBA for each sworn officer at the rank of lieutenant or below, with final approval by the commanding officer no later than 60 days after the officer's current rank anniversary date.

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<sup>1</sup> LAPD Manual Section 3/760.20; LAPD Special Order No. 35, 2010 (December 7, 2010)

<sup>2</sup> LAPD Form 01.87.02 (revised 11/08)

<sup>3</sup> LAPD Form 01.87.02 (revised 11/08)

## **BACKGROUND ON THE DEPARTMENT'S INSPECTION**

The IAID identified 576 sworn officers and 9 reserve officers with current rank anniversary dates of November 2009 in the 21 geographic Areas, 4 traffic divisions, and 9 other specialized entities. The IAID selected for review a random sample of 95 sworn officers and all 9 reserve officers. For these 104 officers, IAID requested the completed SBAs from the applicable entities. The IAID reviewed the SBAs for nine objectives, with the results summarized as follows:

| <b>Obj. No.</b> | <b>Description of Objective</b>  | <b>No. of SBAs in Compliance</b> | <b>Compliance Rate</b> |
|-----------------|--|----------------------------------|------------------------|
| 1               | SBA Completed Within 60 Days of Current Rank Anniversary Date  | 48/104                           | 46%                    |
| 2               | Completion of All Applicable Sections  | 91/102 <sup>4</sup>              | 89%                    |
| 3               | Field Training Officer (FTO)/Supervisor Attachments Included   | 29/33                            | 88%                    |
| 4               | Appropriate Completion of the <i>Comments</i> Section  | 74/102                           | 73%                    |
| 5a              | Required Supporting Documentation Attached for <i>Greatly Exceeds Standards</i> and <i>Needs Improvement</i> Ratings | 32/39                            | 82%                    |
| 5b              | Supporting Documentation Completed Within 3 Months of Incident   | 31/32                            | 97%                    |
| 5c              | Supporting Documentation Was Event Specific  | 29/32                            | 91%                    |
| 6               | Supporting Documentation Justified <i>Greatly Exceeds</i> and <i>Needs Improvement</i> Ratings                       | 6/32                             | 19%                    |
| 7               | Proper Completion of the <i>Duties</i> Section   | 90/102                           | 88%                    |
| 8               | Proper Completion of the <i>Most Significant Contribution</i> Section  | 83/102                           | 81%                    |
| 9               | Proper Completion of the <i>Training/Employee Development</i> Section  | 63/102                           | 62%                    |

## **REVIEW OBJECTIVES**

The OIG reviewed the Inspection for three objectives: completeness, quality, and findings, as described below:

### Completeness

- Determine if the Inspection tested and reported compliance for all the stated objectives.
- Determine if the Inspection identified complete populations from which to select the samples.

### Quality

- Determine if the Inspection used appropriate sampling methodologies and appropriate testing questions.
- Determine if there was evidence of supervisory review of the Inspection.
- Determine if the Inspection completely and accurately reported its purpose, methodology, objectives, results, and detailed findings.

<sup>4</sup> The SBAs for 2 of the 9 reserve officers were not completed, which reduced the total sample of completed SBAs from 104 to 102.

### Findings

- Determine if all significant findings identified by the OIG were also identified and reported by IAID.
- Determine if the findings reported by IAID represented valid issues.

## **REVIEW METHODOLOGY**

The OIG assessed the completeness, quality, and findings of IAID's Inspection by reviewing the final Inspection Report, Inspection Work Plan, and Inspection work papers.

The OIG re-performed the same tests performed by IAID, using a sub-sample of IAID's sample. This sub-sample included 24 of the 95 completed sworn officer SBAs and 3 of the 9 reserve officer SBAs. The OIG's sub-sample size of 27 was calculated using a 95% one-tail confidence level, an expected error rate of 6%, and a 7% plus-precision.<sup>5</sup>

The OIG conducted this review in accordance with generally accepted government auditing standards. These standards require that the review is adequately planned, performed, and supervised, and that sufficient, appropriate evidence is examined to provide a reasonable basis for the results and conclusion.

## **RESULTS**

### Completeness

The Inspection tested and reported compliance for all of its stated Inspection objectives used to assess the SBAs. Also, the Inspection selected its samples from complete populations. Hence, the Inspection met the OIG's standard for completeness.

### Quality

The Inspection used appropriate testing questions, and there was evidence of supervisory review of the Inspection. Also, the Inspection completely and accurately reported its purpose, methodology, objectives, results, and detailed findings. However, the OIG had the following issue with the Inspection's sampling methodology:

### **SBAs Completed *After* the Start of the Inspection Were Tested**

The IAID selected their Inspection sample and then requested the divisions to send the completed SBAs. For 16 of these SBAs, the divisions advised IAID that the SBAs had not yet been completed. The IAID then advised the divisions that they could submit these 16 SBAs later after they had been completed, and IAID would then test them.

This methodology is unsound, as the commanding officers could have ensured that the 16 SBAs completed after the start of Inspection were correctly completed in compliance with all

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<sup>5</sup> This sample size calculation formula is a generally accepted auditing practice. A detailed explanation of each parameter is available from the OIG Audit Section.

requirements, since the supervisors then had knowledge that these 16 SBAs were in the Inspection sample. Hence, these 16 SBAs may not have been representative of the population of all completed SBAs. The IAID should have replaced these 16 SBAs with SBAs completed *before* the start of the Inspection.

**Written Response of IAID Management:** “The not-yet-completed SBAs were identified in the report as being past due, which is one of the major concerns of the inspection. If the division submitted the SBA during the inspection, it was included in the sample, after the fact of course, to test for its content. Although they were aware of the request for the specific SBA, they were not aware of what was being tested.”

Because of this sampling methodology issue which affected 16 SBAs (approximately 16% of IAID’s sample), the Inspection did not meet the OIG’s standard for quality.

### Findings

The Inspection’s reported findings correctly represented significant instances in which compliance was not achieved. Furthermore, there were no additional findings that were not reported by the Inspection which represented significant instances in which compliance was not achieved. Hence, the Inspection met the OIG’s standard for findings.

### FOCUS POINT

The IAID reported a compliance rate of 19% for Objective 6, Supporting Documentation Justified *Greatly Exceeds* and *Needs Improvement* Ratings, writing in the Inspection Report:

*The 32 full-time officer SBAs which had supporting documentation attached for assessments of “Greatly Exceeds Standards” or “Needs Improvement” were reviewed. The supporting documentation attached to 6 (19%) of the SBAs justified the assessments of “Greatly Exceeds Standards” or “Needs Improvement” assessments. The supporting documentation attached to the remaining 26 SBAs lacked articulation to support an assessment of “Greatly Exceeds Standards” or “Needs Improvement” for the entire evaluation period.*

*On May 27, 2010, IAID presented this inspection to the Commanding Officer of Professional Standards Bureau who was in general agreement with the findings. He advised that the inspection findings would be considered as the SBA process was being reviewed for possible modifications. In addition, the Commanding Officer of IAID discussed the findings with the Assistant Director of the Office of Operations and Commanding Officer of Personnel and Training Bureau on June 4, 2010.*

The OIG, via its review of a sub-sample of 27 SBAs, confirmed that IAID correctly identified and reported this pervasive non-compliance issue. The OIG notes that a major reason for non-compliance was that Comment Sheets were not being consistently generated, and with adequate detail, throughout the rating period to adequately support the *Greatly Exceeds Standards* ratings

on the SBAs. The OIG awaits the Department's action to remedy this low compliance rate and notes that IAID plans follow-up inspections of SBAs for Fiscal Years 2010/2011 and 2011/2012.

### **RESPONSE OF IAID MANAGEMENT**

Management of IAID generally agreed with the results of the OIG's review.

### **CONCLUSION**

The OIG concluded that the Inspection met the OIG's standard for completeness and findings. However, because of the aforementioned sampling methodology issue which affected 16 SBAs in IAID's sample (approximately 16%), the Inspection did not meet the OIG's standard for quality.