

LOS ANGELES POLICE COMMISSION

***TRAINING EVALUATION AND
MANAGEMENT SYSTEM (TEAMS) II
AUDIT, PHASE I
(Fiscal Year 2007/2008)***



Conducted by

OFFICE OF THE INSPECTOR GENERAL

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EXECUTIVE SUMMARY
Office of the Inspector General
Training Evaluation and Management System (TEAMS) II Audit, Phase I
(Fiscal Year 2007/2008)

PURPOSE

Pursuant to Consent Decree Paragraph 137, the Office of the Inspector General (OIG) conducted its Training Evaluation and Management System (TEAMS) II Audit (Audit). Specifically, Paragraph 137 requires that the OIG, between 6-12 months following the implementation of TEAMS II and on a regular basis thereafter, audit the quality and timeliness of the Los Angeles Police Department's (LAPD or Department) use of TEAMS II to perform the tasks identified in the protocol described in Consent Decree Paragraph 47.

AUDIT METHODOLOGY

The OIG assessed system-generated action items, the Department's handling of disputed data corrections in key source systems, and employees' access to their own TEAMS reports in this Phase I Audit. The six subparagraphs of Paragraph 47 covered were d, e, h, j, k (1), and l. Additionally, the OIG assessed the Department's performance in accordance with Special Order No. 20, 2006, Special Order No. 22, 2007, Chief of Police Notices, and other procedures which relate to TEAMS II usage.

Generally, the OIG used a 95 percent confidence level, with an expected error rate of six percent and a plus precision of seven percent when selecting its random samples. In some cases, in addition to the original random sample, the OIG expanded test work by selecting a supplemental judgmental sample based on risks. For some of the test work, the OIG assessed the entire population to draw conclusions.

The timeframe under audit was between January 31, 2007 (when the system-generated action items were first activated) and August 31, 2007. Due to constant fixes and patches being applied in TEAMS II, many of the significant exceptions identified in the beginning of the Audit were re-visited in August 2007. Unless otherwise stated, the exceptions included in this report are those which were not fixed by then.

SUMMARY OF RESULTS

- Risk Management Information System (RMIS) may be generating more action items (approximately 2,500 action items for 2,000 employees per year) than the Department can cost-effectively and timely complete. The Department has advised that the volume of system-generated action items is more than originally projected. One reason for so many action items is that action items are being generated for some employees that have had very limited activity related to the threshold, and these action items do not appear to be warranted. For example, in the OIG's sample of 32 action items, five (16%) action items were generated due to an officer receiving one complaint or being involved in one use of force, but because they had a limited number of arrests for the period (ranging from one to six), the action item was generated.

Executive Summary

Training Evaluation and Management System (TEAMS) II Audit, Phase I

(Fiscal Year 2007/2008)

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- Per Special Order No. 20, 2006 and Special Order No. 22, 2007, Risk Management Group (RMG) was assigned TEAMS II audit responsibilities. As of October 10, 2007, they had not completed any TEAMS II audits. However, an audit plan is being prepared with consultation provided by the Audit Division.
- For 14 of 23 action items in another sample, there was no evidence per the TEAMS II report that the required follow-up action was taken. As of August 22, 2007, it had been 105 to 147 days, since the final dispositions were made, with a mean of 120 days.
- For 19 of the 32 sampled action items, there was no indication that the supervisor met with the involved employee before the action item was completed, as required by an Intradepartmental Correspondence (15.2) issued on January 29, 2007, by Consent Decree Bureau.
- As of August 22, 2007, 227 pending action items were past due (i.e., not completed within 30 days), with 73 past due more than 60 days, ranging to 144 days.
- For five of 13 requests sent from Use of Force Review Division (UOFRD) to TEAMS II Development Bureau (TEAMS II Bureau) for correcting historical disputed data in the Use of Force System, the correction was not made by TEAMS II Bureau as of August 20, 2007. It had been more than five months since the requests were made by UOFRD.
- There was no mechanism designed within RMIS to force the investigating supervisors to open reports that are mandated to be reviewed.

On October 10, 2007, the OIG met with the Commanding Officer of TEAMS II Bureau, an Officer-in-Charge in RMG, and other key personnel from both entities to discuss the Audit's findings in detail. At that time, TEAMS II Bureau and RMG indicated agreement with most of the Audit's findings and provided the OIG with action plans that have been incorporated into the report where appropriate.

**OFFICE OF THE INSPECTOR GENERAL
FISCAL YEAR 2007/2008
TRAINING EVALUATION AND MANAGEMENT SYSTEM (TEAMS) II
AUDIT, PHASE I**

PURPOSE

Pursuant to Consent Decree Paragraph 137, the Office of the Inspector General (OIG) conducted its Training Evaluation and Management System (TEAMS) II Audit (Audit). Specifically, Paragraph 137 requires that the OIG, between 6-12 months following the implementation of TEAMS II and on a regular basis thereafter, audit the quality and timeliness of the Los Angeles Police Department's (LAPD or Department) use of TEAMS II to perform the tasks identified in the protocol described in Consent Decree Paragraph 47.

BACKGROUND

The Consent Decree mandated the Department to enhance its legacy information system known as TEAMS to become TEAMS II, which provides the capability to perform complex employee and organizational performance analysis to identify at-risk employees and organizations. TEAMS II is composed of 14 independent personnel performance source applications/databases which contribute selected data into TEAMS II.¹ The majority of these applications were existing applications in TEAMS but some were newly developed. The newly developed applications include the Deployment Period System (DPS) which involves on-line deployment/personnel status reporting, the Use of Force System (UOFS) which provides use of force data, the Complaint Management System (CMS) which provides personnel complaint data, and the Risk Management Information System (RMIS) which generates action items and provides various analytical reports.

RMIS serves as a tool for supervisors and managers to conduct regular reviews of individual and organizational performance. When RMIS receives data indicating that an employee has engaged in a type of activity analyzed by RMIS, it performs a statistical analysis of the employee's activity compared to that of the employee's peer group.² The employee activity data analyzed by RMIS includes personnel complaints, use of force incidents, claims and lawsuits, preventable traffic collisions, pursuits, stops and arrests. Then, if the employee's activity exceeds a particular threshold setting designed in RMIS, RMIS will automatically generate an action item. The action item is then forwarded to the employee's supervisor for review. The investigating supervisor will document his/her review in an "investigative narrative" field and choose an appropriate disposition (e.g., complaint, training, no action, etc.). Upon completion, the investigating supervisor will forward the review of the action item up his/her chain of command to the Bureau commanding officer who will finish the review.

¹ The 14 applications are Canine System (**K-9**), Claims/Lawsuit Information System (**CLIS**), Complaint Management System (**CMS**), Comprehensive Automated Permit System (**CAPERS**), Consolidated Crime Analysis Database (**CCAD**), Department Employees Commendation System (**DECS**), Deployment Period System (**DPS**), Fleet Safety Reporting (**FSR**), Shooting Qualification and Bonus System (**SQUABS**), System to Organize Pedestrian/Vehicle Stops (**STOPS**), Traffic Information System (**TIS**), Training Management System (**TMS**), Use of Force System (**UOFS**), and Vehicle Pursuit System (**VPS**).

² Every Department employee is assigned to a peer group based on the type of work he/she performs. There are a total of 33 peer groups in RMIS.

Action items were first activated on January 31, 2007 and completely “rolled-out” Department-wide as of March 12, 2007. As of July 31, 2007, there have been 1,232 action items generated involving 952 employees, with review finalized for 788 of these action items.

SCOPE AND METHODOLOGY

In addition to the previously mentioned system-generated action items (AI), RMIS provides the capability for supervisors to create their own action items, known as supervisor action items (SAI). In order to effectively and efficiently assess if the Department and TEAMS II are in compliance with Consent Decree Paragraph 47, the OIG decided to conduct this Audit in two phases. The OIG assessed system-generated action items, the Department’s handling of disputed data corrections in key source systems, and employees’ access to their own TEAMS II reports in this Phase I Audit.³ The six subparagraphs of Paragraph 47 covered were d, e, h, j, k (1), and l. Additionally, the OIG assessed the Department’s performance in accordance with guidelines outlined in the RMIS User Guide; the Intradepartmental Correspondence (15.2) dated January 29, 2007, to all Commanding Officers from the Commanding Officer at Consent Decree Bureau; Special Order No. 20, 2006; Special Order No. 22, 2007; Chief of Police Notices; and other procedures which relate to TEAMS II usage. The OIG will assess supervisor action items in the Phase II portion of the Audit, covering subparagraphs a, b, c, f, g, i, k (2), and m of Paragraph 47.

Generally, the OIG used a 95 percent confidence level, with an expected error rate of six percent and a plus precision of seven percent when selecting its random samples. In some cases, in addition to the original random sample, the OIG expanded test work by selecting a supplemental judgmental sample based on risks. For some of the test work, the OIG assessed the entire population to draw conclusions.

The timeframe under audit was between January 31, 2007 (when the system-generated action items were first activated) and August 31, 2007. Due to constant fixes and patches being applied in TEAMS II, many of the significant exceptions identified in the beginning of the Audit were re-visited in August 2007. Unless otherwise stated, the exceptions included in this report are those which were not fixed by then.

SUMMARY OF RESULTS

- Risk Management Information System (RMIS) may be generating more action items (approximately 2,500 action items for 2,000 employees per year) than the Department can cost-effectively and timely complete. The Department has advised that the volume of system-generated action items is more than originally projected. One reason for so many action items is that action items are being generated for some employees that have had very

³ During the review of system-generated action items and assessment of the quality of the supervisor's review and pursuant to Consent Decree Paragraph 138, the OIG examined and assessed the applicable officer's TEAMS II information.

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limited activity related to the threshold, and these action items do not appear to be warranted. For example, in the OIG's sample of 32 action items, five (16%) action items were generated due to an officer receiving one complaint or being involved in one use of force, but because they had a limited number of arrests for the period (ranging from one to six), the action item was generated. To address this concern, the Department is planning to re-assess this area and then present any proposed modifications to the Department of Justice (DOJ) and the Independent Monitor (Monitor) in early 2008.

- Per Special Order No. 20, 2006 and Special Order No. 22, 2007, Risk Management Group (RMG) was assigned TEAMS II audit responsibilities. As of October 10, 2007, they had not completed any TEAMS II audits. However, an audit plan is being prepared with consultation provided by the Audit Division.
- For 14 of 23 action items in another sample, there was no evidence per the TEAMS II report that the required follow-up action was taken. As of August 22, 2007, it had been 105 to 147 days, since the final dispositions were made, with a mean of 120 days.
- For 19 of the 32 sampled action items, there was no indication that the supervisor met with the involved employee before the action item was completed, as required by an Intradepartmental Correspondence (15.2) issued on January 29, 2007, by Consent Decree Bureau.
- As of August 22, 2007, 227 pending action items were past due (i.e., not completed within 30 days), with 73 past due more than 60 days, ranging to 144 days.
- For five of 13 requests sent from Use of Force Review Division (UOFRD) to TEAMS II Development Bureau (TEAMS II Bureau) for correcting historical disputed data in the UOFS, the correction was not made by TEAMS II Bureau as of August 20, 2007. It had been more than five months since the requests were made by UOFRD.
- There was no mechanism designed within RMIS to force the investigating supervisors to open reports that are mandated to be reviewed.

On October 10, 2007, the OIG met with the Commanding Officer of TEAMS II Bureau, an Officer-in-Charge in RMG, and other key personnel from both entities to discuss the Audit's findings in detail. At that time, TEAMS II Bureau and RMG indicated agreement with most of the Audit's findings and provided the OIG with action plans that have been incorporated into the report where appropriate.

DETAILED FINDINGS

Subparagraph 47d - Performance Threshold Formulas

Subparagraph 47d requires the establishment of guidelines for numbers and types of incidents to cause the activation of an action item in TEAMS II, and the frequency of these reviews.

In order to assess whether the Department met the mandate of this subparagraph, the OIG obtained the RMIS formulas for all 15 performance thresholds, as agreed upon by the City and the Department of Justice for activating a system-generated action item. The OIG also obtained RMIS readiness testing materials utilized by the contractor Sierra Systems Group Inc. (Sierra) and reviewed by TEAMS II Bureau, and other relevant design documents. Additionally, the OIG obtained the daily final completed action items reports and pending action items reports. The OIG did not validate the accuracy of the 15 performance threshold formulas, which would have included detailed, technical testing.

Assessment of Performance Thresholds

Based on our review, the OIG noted that RMIS may be generating more action items (approximately 2,500 action items for 2,000 employees per year⁴) than the Department can cost-effectively and timely complete. The Department has advised that the volume of system-generated action items is more than originally projected. One reason for so many action items is that action items are being generated for some employees that have had very limited activity related to the threshold, and these action items do not appear to be warranted. For example, in the OIG's sample of 32 action items, five (16%) action items were generated due to an officer receiving one complaint or being involved in one use of force, but because they had a limited number of arrests for the period (ranging from one to six), the action item was generated.⁵

Department Action Plan

The Department is planning to re-assess the peer group settings, performance thresholds, and disposition types at the end of 2007 and submit its proposed modifications to the DOJ and the Monitor in early 2008.

⁴ As of August 22, 2007, there were 939 action items completed through final Bureau level review, of which 797 received a disposition of "no action." The "no action" disposition accounted for approximately 85 percent of the total action items.

⁵ The performance thresholds generating the five action items were No. 2 – Use of Force to Arrests (three action items) and No. 6 - Complaints to Arrests (two action items).

Subparagraph 47e - Follow-up on Supervisory Actions Taken

Subparagraph 47e requires guidelines be provided for appropriate follow-up actions to be taken based on reviews of information in TEAMS II.

In order to assess this subparagraph, the OIG obtained the Department policies, procedures, and the Final Completed Action Items Report as of May 11, 2007.

Assessment of Follow-up Actions Taken as a Result of Action Item Disposition

Among the total of 293 final completed action items as of May 11, 2007, 247 (85%) action items received a “no action” disposition, and 46 (15%) action items received a disposition other than "no action," requiring some type of follow-up action. From these 46, the OIG selected a random sample of 23. For 14 of the 23 (61%) sampled action items, there was no evidence per the TEAMS II report that the mandated follow-up action was taken as of August 22, 2007. It had been 105 to 147 days since the final dispositions were made, with a mean of 120 days. The following table provides details on the dispositions and a breakdown of the follow-up action status for these 23 action items.

Breakdown of Follow-up Actions for the 23 Sampled Action Items

Disposition	Total No. of Sampled AIs	Total No. of AIs With Evidence per TEAMS II Report that Follow-up Action Was Done	Total No. of AIs Without Evidence per TEAMS II Report that Follow-up Action Was Done
Commendation	6	2	4
Comment Card	6	2	4 ⁶
Informal Meeting	6	2 ⁷	4
Training	3	1	2
Complaint	1	1 ⁸	0
RMEC Referral	1	1 ⁹	0
Total	23	9	14

In our sample of 23 action items, there were six action items with an “informal meeting” disposition, but only two of them documented in the “investigative narrative” that the informal meeting was conducted by the supervisor. Special Order No. 22, 2007 states that an informal meeting shall be “used when the supervisor meets with the employee and conducts an informal counseling session.” However, the OIG found that the Department did not provide any guidelines for documenting that an informal meeting was conducted. Given that the “informal meeting” disposition accounted for 37 percent of all the action items which received a final disposition other than “no action” (as of August 22, 2007), the OIG believes that the Department

⁶ The OIG requested the Divisions to locate these comment cards and none of them were located.

⁷ These informal meetings were documented in the investigative narratives.

⁸ The complaint was for “failure to qualify” which was initiated prior to the generation of this action item.

⁹ This employee had already been referred to the Risk Management Executive Committee (RMEC) prior to the generation of this action item and is currently being monitored.

should provide guidelines for documenting the extent of the counseling and the date it was conducted.¹⁰

Additionally, based on our review of Special Order No. 20, 2006 and Special Order No. 22, 2007, the OIG noted that the responsibility to audit TEAMS II is assigned to RMG. As of October 10, 2007, RMG had not completed any such audits due to a lack of auditing resources.

Department Action Plan

TEAMS II Bureau and RMG concurred with the OIG's finding and provided us with a few action plans, as follows:

- *TEAM II Bureau and RMG will include the re-assessment of the disposition types in the year-end evaluation of peer group settings and performance threshold calculations and then submit any proposed changes to the DOJ and the Monitor.*
- *RMG will follow-up on the findings identified in this subparagraph with each related entity and ensure that the follow-up action is taken. Prior to the audit's conclusion, two "commendation" dispositions and two "training" dispositions were updated to the related four officers' TEAMS II reports.*
- *RMG will include the assessment of follow-up action taken (if applicable) in their upcoming audit.*
- *RMG, in consultation with Audit Division, is preparing an audit plan for their first TEAMS II audit, which will primarily assess compliance with Special Order No. 20, 2006 and related policies and procedures.*

Subparagraph 47h – Opening of Mandated Reports

Subparagraph 47h requires that actions taken as a result of information from TEAMS II be based on all relevant and appropriate information, and not solely on the number of percentages of incidents in any category recorded in TEAMS II.

Assessment of the Supervisor Opening of Mandated Reports for AIs

Special Order No. 22, 2007, entitled "Duty to Conduct and Document Individual Performance Assessments" dated June 4, 2007, was distributed Department-wide the week of July 16, 2007. Special Order No. 22, 2007, listed multiple mandated reports to review for three different levels of involved employees. In order to assess this subparagraph, the OIG researched whether the investigating supervisor (the first level reviewer of the action item) who is the involved

¹⁰ As of August 22, 2007, there were 939 action items completed through final Bureau level review, of which, 142 received a disposition other than "no action." The "informal meeting" disposition accounted for 52 of the 142 (37%) action items.

employee’s direct supervisor could conduct the minimum review as required by Special Order No. 22, 2007. The OIG noted in RMIS that mandated reports are made available to the supervisor via a hyperlink; however, RMIS does not force the supervisor to open any of these reports to evidence their review. In order to assess the Department’s compliance with Special Order No. 22, 2007, the OIG selected a random sample of 15 action items from all the action items which were created and completed in August, 2007. The OIG’s detailed review of the RMIS monitoring report, which tracks the history of opening each report by the investigating supervisor, disclosed that for 8 of the 15 (53%) sampled action items, it appears that the investigating supervisor did not open all the mandated reports. Refer to the table below for breakdown of supervisor opening of mandated reports.

Breakdown of Supervisor Opening of Mandated Reports

Report Name	Total No. of Applicable Reports	Total No. of Reports Not Opened	Percentage of Non-Compliance
TEAMS II Report (RMIS-01 or A01)	15	4	27%
Summary of Employee Activity (RMIS-02 or A02)	15	5	33%
Comparison of Employee Activity to Selected Organizations (RMIS-03 or A03) ¹¹	8	7	88%
Threshold Activation Report (RMIS-10 or R10)	15	5	33%

Assessment of the Design of RMIS Check Boxes and Linked Reports for SAIs

The OIG also noted that there are similar system design deficiencies for Supervisor Action Items. Specifically, there are three check boxes that a supervisor must check off to evidence his/her review, as follows: 1) Have you examined other pending complaints, if any? 2) [Have you] examined the TEAMS II report in detail? 3) [Have you] examined the Summary of Employee Activity and other linked reports above? Based on our general review of the system design in RMIS, the OIG found that despite that RMIS forces the reviewers to check off the aforementioned three boxes evidencing that they have examined all the mandated reports which were made available via a hyperlink before going to the next screen, RMIS does not force the reviewers to actually open any of these reports. The OIG is concerned that, in the current design, reviewers could simply check off all the boxes indicating that they have reviewed the mandated reports without ever opening any of the reports.

Furthermore, for both system-generated action items and supervisor action items, optional reports and mandated reports are being listed together without any differentiation, making it unclear to the reviewers which reports are mandated versus optional to review.

The OIG believes that without fixing the deficiencies in RMIS, the supervisors may not open and review the mandated reports as required by Special Order No. 22, 2007.

¹¹ Per Special Order No. 22, 2007, for supervisor and manager levels of employees being reviewed, Comparison of Employee Average Activity for Selected Organizations (E06) is one of the mandated reports to review; however, it was replaced by an optional report A03. When the OIG compared reports A03 and E06, it was noted that A03 contained all the information in E06. Thus, there is no risk associated with reviewing A03 instead of E06.

Department Action Plan

TEAMS II Bureau concurred with the OIG's finding and advised the OIG that they will request Sierra to "patch" RMIS, so as to differentiate the mandated reports from the optional reports and force the reviewers to open the mandated reports before they complete the action item.

Subparagraph 47j (1) – Employee's Access to Their TEAMS II Report

Subparagraph 47j requires each LAPD officer be able to review, on a regular basis, all personally-identifiable data about them on the TEAMS II report in order to ensure the accuracy of that data.

Assessment of Employees' Access to Their TEAMS II Report

In order to assess this subparagraph, the OIG judgmentally selected a sample of 33 officers with one officer from each geographical area, each division of Special Operations Bureau, and Detectives Bureau. In addition, the OIG obtained the complete listing of all employees with access to RMIS to view their personal TEAMS II reports. The OIG then reviewed the sampled officers' access roles in the RMIS user access listing and found that all 33 officers had access to view their TEAMS II reports.

Additionally, the OIG assessed all 25 sworn and civilian employees who were identified with no peer groups to determine whether they could view their own TEAMS II reports. This follow-up review disclosed that one reserve officer could not access his TEAMS II report.¹² However, this appears to have been an isolated incident, possibly due to the reserve officer not having a work assignment input into DPS.

Department Action Plan

TEAMS II Bureau concurred with the OIG's finding and rectified this employee's access which allowed him to view his TEAMS II report.

Subparagraph 47j (2) – Disputed Data Correction

Subparagraph 47j further requires that a protocol be adhered to for correcting data errors discovered by officers in their review of the TEAMS II data.

Per Special Order No. 20, 2006, after receiving a request to correct inaccurate or incomplete data, the commanding officer of the entity responsible for correcting data in TEAMS II shall: 1) investigate the disputed information; 2) ensure that a resolution is obtained within 30 days of the

¹² This reserve officer was assigned to the Area in May 2007.

request; 3) correct the disputed information, if appropriate; and, 4) notify the employee's commanding officer of the resolution in an Intradepartmental Correspondence, Form 15.2 (15.2).

Based upon our risk assessment, the OIG decided to focus on the major source systems which feed data into RMIS. As such, the OIG selected UOFS and CMS. The OIG assessed the procedures within each entity responsible for the data entry/maintenance of the aforementioned source systems.

Assessment of CMS Disputed Data Corrections

A total of 66 entries for CMS data correction were identified in the CMS disputed data correction log created by the Review & Evaluation Section (R&E) of Internal Affairs Group. A random sample of 22 recent entries involving 18 employees was selected.

Based on our review, the OIG found that R&E made all the necessary corrections of disputed data in CMS. However, of the 22 data correction requests, only five were handled in strict accordance with Department policies, the remaining 17¹³ were not, as follows:

- For four of the disputed data correction requests, a request was not made via a 15.2;
- For six of the disputed data correction requests, a resolution was not obtained within 30 days after receiving the Area's request, ranging from two to 12 days late; and,
- For 13 of the disputed data change requests, a notification of resolution was sent via email or telephone instead of a 15.2 to the employee's commanding officer.

As a result of our assessment, R&E formalized the internal procedure to re-emphasize, to their designated personnel, the procedures for handling disputed data correction in CMS.

Assessment of UOFS Disputed Data Corrections

The UOFRD provided the OIG with all 13 UOF disputed data correction requests involving 12 officers. Based on our testwork results, for all 13 UOF cases, the OIG noted that a 15.2 was sent by UOFRD to TEAMS II Bureau requesting them to make the data correction. UOFRD could not make these corrections since the applicable cases were historical cases (cases which were uploaded to UOFS via data conversion).

Based on our review, the OIG found that none of these 13 requests were handled in strict accordance with Department policies, as follows:

- One request was done via email by the involved officer, not via a 15.2;
- For six of the requests, a resolution was not obtained within 30 days after the area submitted a 15.2. For three of the aforementioned six requests, there was no evidence that a 15.2 was sent to the Area; and,

¹³ Some of the data correction requests had more than one exception type.

- For ten of the requests sent from UOFRD to TEAMS II Bureau, the corrections had not been made as of May 30, 2007; 41 to 167 days after these requests were made by UOFRD. During the OIG's revisit of these issues on August 20, 2007, the OIG noted that five of the ten disputed data corrections were made.

Department Action Plan

TEAMS II Bureau concurred with the OIG's finding and as of the audit report date, the five remaining disputed data corrections were made. Additionally, the Office of the Chief of Police Notice dated September 28, 2007, to all Department Personnel from the Commanding Officer at Consent Decree Bureau provided two templates (available on the TEAMS II website) to standardize data correction in accordance with the mandates of the Consent Decree Paragraph 47(j) and Department policies.

Subparagraph 47k (1) – Adequacy of Documenting Action Item Reviews

Subparagraph 47k requires regular review by appropriate managers of all relevant TEAMS II information (1) to evaluate officer performance citywide, and (2) to evaluate and make appropriate comparisons regarding the performance of all LAPD units in order to identify any patterns or series of incidents that may indicate at-risk behavior. These evaluations shall include evaluating the performance over time of individual units, and comparing the performance of units with similar responsibilities.

In our Phase I Audit, the OIG only assessed objective (1). Since TEAMS II Bureau is still designing a few reports for comparison of the performance of all LAPD units to satisfy objective (2), that objective will be assessed in the Phase II portion of the Audit.

To assess objective (1), the OIG obtained the Final Completed Action Items Report as of May 11, 2007, which contained a total of 293 final completed action items. The OIG selected a random sample of 32 action items from the six operational Bureaus (i.e., West Bureau, Central Bureau, Valley Bureau, South Bureau, Special Operations Bureau, and Detective Bureau). Additionally, the OIG obtained a report containing supervisor investigative narratives and information on which supervisors/commanding officers were involved in the review.

Assessment of Documentation of Action Item Reviews

The OIG assessed whether the documentation of the review of the action item and related rationale for the disposition in each investigative narrative appeared adequate. The OIG found that for 29 of the 32 (90%) sampled action items, the supervisor adequately documented the review of the action item and the related rationale for the disposition in the investigative narrative. There were three supervisors who appeared not to adequately document the extent of their reviews in the investigative narratives. When the OIG extended its testwork by evaluating all action items reviewed by these three supervisors, it was noted that two of the supervisors adequately documented their assessment of all other action items; but one supervisor exhibited

the same concern in another action item’s review. The OIG believes, in general, the Department adequately documented the reviews of the action items and related rationales for the dispositions in the investigative narratives based on the guidance provided to supervisors during Department-wide trainings on how to complete action items.

Assessment of Supervisors’ Meeting with the Employees

The 15.2 dated January 29, 2007, from the Commanding Officer of Consent Decree Bureau requires that, prior to completing the review, the investigating supervisor meet with the involved employee to discuss the action item and document the date and time of the meeting.¹⁴ Based on our review, the OIG noted that 19 of the 32 (59%) sampled action items did not indicate that a supervisor met with the involved employee before the action item was completed. Among the 13 in which the supervisor documented that they met and discussed the action item with the involved employee, four did not indicate the date of the meeting.

Department Action Plan

RMG personnel plan to provide, in the RMIS User Guide, an updated narrative exemplar regarding how supervisors should document their meetings with employees. Also, RMG will cover this area in their upcoming audit.

Subparagraph 471 - Timely Completion of Action Item Reviews

Subparagraph 471 requires that the protocol shall provide for the routine and timely documentation in TEAMS II of actions taken as a result of reviews of TEAMS II information. Additionally, Department policy requires that an action item be completed within 30 days after it is generated unless an extension is approved by the commanding officer.

Assessment of Timely Completion of Action Item Review

To assess the timeliness of completion of action items Department-wide, the OIG obtained the Pending Action Items Report as of August 22, 2007. This report contained 502 pending action items, with 227 past due. Note per the aging analysis below that 73 of these 227 (32%) action items were past due more than 60 days, ranging to 144 days.

Aging Analysis of 227 Past Due Action Items

Past Due Days	Less than 30 Days	31-60 Days	61-90 Days	Over 90 Days
Quantity	70	84	50	23
Percentage	31%	37%	22%	10%

Regarding our original sample of 32 action items, 11 of them (34%) were not completed within the 30-day deadline, ranging from two to 15 days past due.

¹⁴ In this Audit, the OIG only assessed whether the supervisors documented the date of the meeting with the employee. Documentation of the time of the meeting was not assessed.

The OIG noted that TEAMS II Bureau, RMG, and Sierra have held weekly action item meetings to monitor the progress of past due action items and have provided assistance to the reviewers to ensure timely completion. Moreover, the Office of Chief of Police Notice dated July 18, 2007, re-iterated that all action items shall be completed through Bureau level review within 30 days of being generated. As previously mentioned, the current RMIS thresholds are generating more action items than originally anticipated. The OIG believes that once the thresholds are modified, there should be a decrease in overall amount of action items, and as a result, the timeliness of completing action items might be improved.

Department Action Plan

In addition to the aforementioned on-going efforts, RMG is planning to include the assessment of timely completion of the action items review in their upcoming audit.

Assessment of Action Items Being Recorded Accurately on Officers' TEAMS II Reports

A system-generated action item will appear on an employee's TEAMS II report as "pending" after the investigating supervisor completes his/her first level of review. The "pending" status will remain until it has been reviewed by the employee's Bureau. Upon final review and approval, it will change to indicate the final disposition of the action item.

For the 32 sampled final completed action items, the final dispositions were accurately recorded on the related officers' TEAMS II reports.

OTHER RELATED MATTER

Local Area Network Security

The OIG has previously identified concerns with Local Area Network (LAN) security which, because of their confidential nature, are not discussed within this Audit Report. However, these concerns were discussed with Information Technology Division management and they have advised that these concerns will be adequately addressed in the near future through the implementation of new policies and procedures.

RECOMMENDATIONS

Based on our review, the OIG recommends the following:

- 1) The Department should re-assess the peer group settings, performance threshold formula, and disposition types related to action item reviews, and make the necessary modifications.
- 2) The Department should provide guidelines for the follow-up action due date and the extent of the documentation required for those disposition types that are not covered in the existing policies or procedures (e.g., informal meeting).

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- 3) The Department should finalize its audit plan and commence TEAMS II audits, as required by the Special Orders. These audits shall assess areas of concern identified in this Audit, including but not limited to the following:
 - a. Handling disputed data corrections, to ensure that they are done accurately and timely, as required by Special Order No. 20, 2006;
 - b. Follow-up actions taken based on the review of system-generated action items and the subsequent dispositions;
 - c. Supervisory documentation of meetings with employees to discuss action items prior to their completion; and,
 - d. Timeliness of completion of action item reviews.
- 4) The Department should “Patch” RMIS so as to differentiate the mandated reports from the optional reports and force the reviewers to open the mandated reports before they complete the action item.

CONCLUSION

Regarding system-generated action items, the OIG believes, in general, the Department adequately documented the reviews and the related rationales for the dispositions in the investigative narratives. However, the OIG is concerned that: 1) the current peer group and performance threshold settings in RMIS may be generating more action items than the Department can cost-effectively and timely complete; 2) approximately 32 percent of all 227 past due action items were past due more than 60 days; 3) some action items lacked evidence that the required follow-up actions were being done; and, 4) RMIS does not have a mechanism to force the action item reviewers to open the mandated reports; and as a result, some investigating supervisors were not opening the mandated reports. All employees tested had access to their TEAMS II report, except for one isolated incident. Relative to CMS, disputed data correction requests were completely processed with the necessary corrections made, despite some procedural exceptions. However, relative to UOFS, disputed data correction requests sent from UOFRD to TEAMS II Bureau were not always completely processed with the necessary corrections made.

Despite some concerns identified in this Audit, the OIG would like to recognize the multiple on-going efforts of TEAMS II Bureau and RMG to ensure continuous improvement in the effectiveness and user friendliness of TEAMS II. These efforts include, but are not limited to: 1) weekly action item meetings to monitor the progress of past due items; 2) bi-monthly TEAMS II coordinator meetings to identify issues, and promote consistency and standardization; 3) an on-line suggestion box to collect suggestions from users; and, 4) sending help desk staff out to the field to help users.

The OIG believes with the implementation of the aforementioned action plans, progress shall be made.