

Memorandum



CITY OF DALLAS
(Report No. A17-001)

DATE: October 7, 2016

TO: Honorable Mayor and Members of the City Council

SUBJECT: Audit of the Design of Controls over the Dallas Police Department's Police Personnel and Training Services¹

The Dallas Police Department (DPD) has made a commitment to: (1) uphold Texas Commission on Law Enforcement (TCOLE) Standards and DPD's General Orders and Standard Operating Procedures (DPD requirements); and, (2) continue to monitor and implement best practices and procedures for police management included in the United States Department of Justice's (DOJ) consent decrees (see textbox). The TCOLE Standards, DPD requirements, and other law enforcement agencies' DOJ consent decrees provide relevant criteria to help DPD management ensure DPD's recruiting, hiring, and training services follow best practices.

Criteria for Design Assessment

The Dallas Police Department's (DPD) General Orders and Standard Operating Procedures (SOP) are documents that establish and define policies, procedures, rules, and regulations governing DPD's operations and activities.

The Texas Commission on Law Enforcement (TCOLE) is the Texas State agency responsible for establishing and enforcing rules related to the oversight of Texas law enforcement agencies. The Civil Rights Division of the Department of Justice (DOJ) negotiates and files consent decrees with police departments found to be engaged in a pattern or practice that violates the United States' Constitution (Constitution) and Federal law. These consent decrees list the police services that must be delivered in a manner which complies with the Constitution, ensures public and officer safety, and promotes citizen confidence in the police department.

Source: DPD, TCOLE, and DOJ

¹ We conducted the Audit of the Design of Controls over the Dallas Police Department's Police Personnel and Training Services under the authority of the City Charter, Chapter IX, Section 3 and in accordance with the Fiscal Year 2014 Audit Plan approved by the City Council. This performance audit was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. The objective of the audit was to evaluate whether DPD personnel practices, including criminal history screening requirements, comply with Texas State Laws, City of Dallas (City) rules, and regulations or other authoritative requirements. The audit was limited to an assessment of the design of the DPD's recruiting, hiring, and training services. The audit scope included management operations from Fiscal Year (FY) 2014 through FY 2015; however, certain other matters, procedures, and transactions outside this period were reviewed to understand and verify information during the audit period. To achieve the audit objective, we: (1) interviewed DPD personnel; (2) reviewed DPD policies and procedures; (3) tested random samples of certain transactions, including supporting documentation; (4) performed various analyses; and, (5) reviewed applicable Texas State Laws and DOJ federal consent decrees. The design assessment did not include a test of the effectiveness of DPD's Police Personnel and Training Services.

The Office of the City Auditor's (Office) internal control design assessment shows DPD has control activities in place, such as General Orders and / or Standard Operating Procedures to help ensure: (1) applicable TCOLE Standards and DPD requirements are upheld; and, (2) DOJ best practices and procedures for police management are generally monitored and implemented when appropriate for the City of Dallas (City).

There are opportunities for DPD to improve by:

- Ensuring the Training Advisory Board (Advisory Board) Members' files include evidence: (1) the Chief of Police approved the appointment of each Advisory Board member; (2) of each Advisory Board member's biography; and, (3) of completion of Advisory Board training within one year of appointment
- Developing and implementing a DPD Standard Operating Procedure that defines the DPD Police Academy instructor qualification requirements to align with TCOLE Standards
- Demonstrating compliance with DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting and the President's Task Force on 21st Century Policing, May 2015, Pillar 1: Building Trust & Legitimacy – Recommendation 1.8² through improved documentation
- Implementing an automated system to efficiently capture and report DPD Police Academy Basic Training and police officer continuing education training

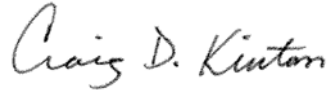
Please see Attachments I, II, III, and IV for issues and associated recommendations, if applicable, resulting from this audit, and see Attachment V for Background.

We recommend the Chief of Police ensures the recommendations discussed in Attachments II and IV are implemented. Please see Attachment VI for Management's Response to the recommendations.

² "Law enforcement agencies should strive to create a workforce that contains a broad range of diversity including race, gender, language, life experience and cultural background to improve understanding and effectiveness in dealing with all communities."

We would like to acknowledge DPD management's cooperation in providing the information needed to complete this audit. If you have any questions or need additional information, please contact me at 214-670-3222 or Carol A. Smith, First Assistant City Auditor, at 214-670-4517.

Sincerely,



Craig D. Kinton
City Auditor

Attachments

C: A.C. Gonzalez, City Manager
Eric D. Campbell, Assistant City Manager
Larry Casto, City Attorney
David Pughes, Interim Chief of Police – DPD
Tammie A. Hughes, Assistant Chief, Administrative Bureau – DPD
Scott Walton, Deputy Chief, Personnel Division – DPD
Jeffrey F. Cotner, Deputy Chief, Training – DPD
Gil Garza, Deputy Chief, Internal Affairs – DPD

Dallas Police Department’s General Orders and Standard Operating Procedures

Selected General Orders and / or Standard Operating Procedures Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p align="center">Hiring Individuals with Appropriate Qualities</p> <p>The Dallas Police Department’s (DPD) Personnel and Development Division Standard Operating Procedure (SOP) 120.00, <i>Applicant Processing Team Purpose and Structure (A)</i> states: <i>“It is the function of the Applicant Processing Team to supervise the training of selected Departmental staff for the Applicant Interview Boards (AIB) which is a crucial part of hiring process.”</i></p> <p>The DPD Personnel and Development Division SOP 120.20, <i>Operation / Control Desk Coordinator (D.i.)</i> states: <i>“Interview boards are charged with the responsibility of evaluating an applicant’s potential to become a successful police officer.”</i></p> <p>The DPD Personnel and Development Division SOP 130.00, <i>Background Unit Purpose and Structure (A)</i> states: <i>“The purpose of the Background Team is to verify information concerning the applicant, which is contained in the Personal History Statement.”</i></p> <p>The DPD Personnel and Development Division SOP 130.50, <i>Background Team Procedures (A)</i> states: <i>“It is mandatory that the Background Detective conducting the background investigation inquiry be as complete and thorough as possible.”</i></p> <p>DPD Mission Statement</p> <p><i>“The Police Department, in serving the people of Dallas, strives to reduce crime and provide a safe city by:</i></p> <ul style="list-style-type: none"> • <i>Recognizing that its goal is to help people and provide assistance at every opportunity;</i> • <i>Providing preventive, investigative, and enforcement services;</i> • <i>Increasing citizen satisfaction with public safety and obtaining community cooperation through the Department’s training, skills, and efforts; and,</i> • <i>Realizing that the Police Department alone cannot control crime, but must act in concert with the community and the rest of the Criminal Justice System.</i> <p><i>In achieving this Mission, the men and women of the Dallas Police Department will conduct themselves in an ethical manner. They will: (1) Respect and protect the rights of citizens as determined by the law; (2) Treat citizens and their fellow employees courteously and with the same amount of dignity with which they expect to be treated themselves; (3) Be examples of honesty and integrity in their professional and personal lives, thereby earning the public trust; (4) Perform their duties with the knowledge that protection of the lives and property of all citizens is their primary duty; and, (5) Comply with the spirit and letter of the Code of Conduct”.</i></p>	<p align="center">Satisfies</p>	<p>The DPD satisfies the DPD requirements for hiring individuals with qualities appropriate for a DPD police officer.</p> <p>The DPD has designed control activities (General Orders and/or SOPs) to minimize the risk of hiring individuals who do not conduct themselves in a manner appropriate for a police officer. Specifically, the DPD uses detailed background checks and an AIB where the recruiters and interviewers look for attributes which would indicate the individual is respectful; treats people with courtesy; is honest and willing to perform their duty; and, can live up to the DPD Code of Conduct.</p> <p>Without control activities, such as detailed background checks and an AIB, the risk is increased that DPD could hire individuals that do not conduct themselves in a manner appropriate for a police officer.</p>	<p align="center">None</p>

Texas Commission on Law Enforcement Standards

Texas Commission on Law Enforcement Standards Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p>Minimum Standards for Enrollment in the Police Academy and Initial Licensure</p> <p>The Texas Commission on Law Enforcement (TCOLE) Standards <i>Statutes and Rules Handbook</i>, June 2014, includes Texas Administrative Code Title 37, <i>Public Safety and Corrections</i>, Chapter 217, <i>Enrollment, Licensing, Appointment, and Separation</i> §217.1, <i>Minimum Standards for Initial Licensure</i>.</p> <p>The Dallas Police Department’s (DPD) Personnel and Development Division Standard Operating Procedure (SOP) 120.00, <i>Applicant Processing Team Purpose and Structure</i>.</p> <p>The DPD Personnel and Development Division SOP 130.00, <i>Background Unit Purpose and Structure</i>.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> TCOLE’s minimum standards for enrollment in the police academy and initial licensure.</p> <p>The DPD has appropriate control activities established through General Orders and / or SOPs to minimize the risk of noncompliance with Texas Administrative Code Title 37, <i>Public Safety and Corrections</i>, Part 7, Chapter 217, Rule §217.1, <i>Minimum Standards for Initial Licensure</i>. For example, DPD uses:</p> <ul style="list-style-type: none"> • A Background Team responsible for verifying the applicant’s information provided in the Personal History Statement and researching the background of each applicant • Nationally recognized psychological tests to screen applicants for traits deemed desirable for police officers • An Applicant Processing Team responsible for maintaining a working knowledge of DPD’s: (1) hiring guidelines; (2) disqualification factors; (3) physical fitness requirements; (4) civil service requirements; (5) final review boards; and, (6) evaluating pre-polygraph test admissions and polygraph test results. The Applicant Processing Team is also responsible for administering required tests, maintaining mandatory paperwork, issuing identification cards to cadets, and hiring cadets. <p>Without appropriate control activities, the risk of noncompliance with Texas Administrative Code Title 37, <i>Public Safety and Corrections</i>, Part 7, Chapter 217, Rule §217.1, <i>Minimum Standards for Initial Licensure</i> increases and DPD might enroll applicants in the DPD Police Academy that are not qualified for licensure as a police officer.</p>	<p>None</p>

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

Texas Commission on Law Enforcement Standards Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p>Training Provider Advisory Board</p> <p>The TCOLE Statutes and Rules Handbook, June 1, 2014 §215.7, Training Provider Advisory Board, requires all training providers approved and licensed by TCOLE to establish and maintain an advisory board.</p> <p>The DPD Training Division SOP – Section 114 <i>Training Advisory Board</i>.</p>	<p>Partially Satisfies</p>	<p>The DPD <u>partially satisfies</u> the TCOLE Standards for a training provider advisory board.</p> <p>The DPD established a DPD Training Advisory Board in accordance with TCOLE Standards. Auditor verification, however, showed that the Training Advisory Board Academy files do not contain the following information required by TCOLE for the Training Advisory Board members appointed on May 8 and May 14, 2015:</p> <ul style="list-style-type: none"> • Six of six, or 100 percent of the Training Advisory Board members were approved by the Chief of Police • One of six, or 17 percent, of the Training Advisory Board members had provided biographies • Three of six, or 50 percent, of the Training Advisory Board members completed the required Advisory Board training within one year of appointment <p>The DPD Training Advisory Board is generally responsible for sharing recommendations with DPD on the development of training curricula for the DPD Police Academy Basic Training and police officer continuing education training.</p> <p>During TCOLE’s 2014 visit to the DPD Police Academy, TCOLE reviewed the following standards: (1) Chapter 1701 Texas Occupations Code sections, §1701.255. <i>Enrollment Qualifications</i>; (2) §1701.256. <i>Instruction in Weapons Proficiency</i>; and TCOLE (3) §215.2(c). <i>General Application and Approval Process (c)</i>; (4) §215.7. <i>Training Provider Advisory Board</i>; and, (5) §215.9. <i>Training Coordinator</i>. No deficiencies were identified for standards one, two, and three noted above. Deficiencies were identified for standards four and five, and DPD responded to TCOLE with planned corrective actions.</p> <p>(Note: See <i>Training and Educational Providers</i> below for DPD corrective actions taken for standard five above).</p> <p>Without a Training Advisory Board, the DPD Police Academy could lose training provider status. If that occurred, DPD would have to contract with another licensed provider to train new applicants.</p>	<p>Recommendation I</p> <p>We recommend the Chief of Police ensures the Training Advisory Board Members' files include evidence: (1) the Chief of Police approved the appointment of each Advisory Board member; (2) of each Advisory Board member's biography; and, (3) of Advisory Board training is completed within one year of appointment.</p>

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

Texas Commission on Law Enforcement Standards Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p>Training and Educational Providers</p> <p>The TCOLE Statutes and Rules Handbook, June 2014, includes Texas Administrative Code Title 37, <i>Public Safety and Corrections</i>, Chapter 215, <i>Training and Educational Providers</i>, §215.3 <i>Law Enforcement Academy Training Provider</i>.</p> <p>The DPD Training Division SOP 203.10, National Academy for Professional Driving (NAPD) is the approved professional Police Driver training course for DPD as required by TCOLE for the Basic Peace Officer Course.</p> <p>The DPD Personnel and Development Division SOP 900.00, <i>Standard Field Sobriety Testing</i>. The Driving While Intoxicated (DWI) Detection and Standardized Field Sobriety Testing (SFST) module was developed by the National Highway Traffic Safety Administration (NHTSA) and is the basis for the DPD’s DWI Detection and SFST curriculum for the DPD Basic Academy training.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> TCOLE Standards for training and educational providers.</p> <p>The DPD has General Orders and/or SOPs to minimize the risk that the DPD Police Academy does not meet the TCOLE Standards for training and educational providers. In addition, TCOLE periodically visits and inspects the DPD Police Academy to verify compliance with TCOLE Standards. According to DPD, to address deficiencies noted during TCOLE’s 2014 visit of the DPD Police Academy for standard five above, <i>Training Coordinator</i>, the following corrective actions were taken:</p> <ul style="list-style-type: none"> • A sergeant position under the Training Coordinator was created that ensures accountability for all areas with reporting responsibilities and ensures all training reports are submitted within the TCOLE’s 30-day requirement. • A sergeant position ensures: (1) each course has a lesson plan and training related materials (tests and answer sheets) on file prior to the start of the course; (2) a resume is on file for each of the course instructors; and, (3) instructor critiques are provided to students, and the results maintained in a file. • The DPD’s previous driving program was eliminated. The DPD now uses the NAPD and all instructors are trained by NAPD. A new SOP, SOP 203.10, <i>Professional Police Driving</i>, was written which follows the NAPD guidelines. Also, SOP 900.00, <i>Standard Field Sobriety Testing</i>, was written which complies with the NHTSA requirements. Both of the new SOP’s were approved by the Training Advisory Board. The SFST Coordinator is a Lieutenant who is permanently assigned to the DPD Police Academy. • The DPD conducted an audit to ensure all exam answers and/or exam matrices are consistent with the master exam. The master exam and course will be maintained for at least five years. <p>Without meeting TCOLE Standards for Training and Educational Providers, the DPD Academy could lose training provider status. If that occurred, DPD would have to contract with another licensed provider to train new applicants.</p>	<p>None</p>

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

Texas Commission on Law Enforcement Standards Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p>Training Coordinator</p> <p>A training coordinator must hold a valid instructor license or certificate and must be a full-time paid employee, as required by TCOLE <i>Statutes and Rules Handbook</i>, June 1, 2014 §215.9, <i>Training Coordinator</i>. The training coordinator must: (1) ensure compliance with TCOLE rules and guidelines; and, (2) prepare, maintain, and submit the specific reports within the time frame specified.</p> <p>The DPD Training Division SOP 323.00, <i>Basic Instructor Certification</i>.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> the TCOLE Training Coordinator Standards.</p> <p>The DPD has General Orders and / or SOPs to minimize the risk that the DPD Police Academy does not meet the TCOLE Standards for a Training Coordinator. Currently, the DPD Deputy Chief managing the DPD Training Division meets the TCOLE Standards as follows: (1) the Deputy Chief is responsible for ensuring DPD compliance with TCOLE rules and guidelines; (2) the Deputy Chief is responsible for preparing, maintaining, and submitting required reports timely; and, (3) the Deputy Chief holds a valid instructor license and / or relevant certifications and is a full-time DPD employee.</p> <p>Without a training coordinator that meets TCOLE Standards, the risk increases that TCOLE would place the DPD Police Academy on probationary status.</p>	<p>None</p>
<p>Instructor Qualification Standards</p> <p>The TCOLE Statutes and Rules Handbook, June 2014, includes Texas Administrative Code Title 37, <i>Public Safety and Corrections</i> Chapter 221, <i>Proficiency Certificates</i>, §221.27 <i>Instructor Proficiency</i>.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> the TCOLE Instructor Qualification Standards for police academy trainers.</p> <p>Although DPD does not have a General Order or SOP that defines the DPD Police Academy instructor qualification requirements, DPD’s practice is to require all DPD Police Academy instructors to meet the TCOLE Standards for a Training Coordinator. Specifically, DPD requires DPD Police Academy instructors to meet the TCOLE requirement for instructor proficiency certification. To qualify for the instructor proficiency certification, the individual must have: (1) two years’ experience as a peace officer, telecommunicator, or jailer; (2) a bachelor’s degree and two years of teaching experience; or, (3) a graduate degree; have successfully completed an instructor training course or its equivalent; submitted a completed application, in the format currently prescribed; and, any required fee.</p> <p>Without meeting TCOLE Instructor Qualification Standards for police academy trainers, the DPD Police Academy could lose training provider status; if that occurred, DPD would have to contract with another licensed provider to train new applicants.</p>	<p>Recommendation II</p> <p>We recommend the Chief of Police develops and implements an SOP that defines the DPD Police Academy instructor qualification requirements to align with TCOLE standards.</p>

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

Texas Commission on Law Enforcement Standards Related to Recruiting, Hiring, and Training	Auditor’s Assessment	Design Assessment Results	Recommendations
<p>Reporting Required Continuing Education Hours</p> <p>The TCOLE Statutes and Rules Handbook, June 1, 2014, §218.5. <i>Reporting Legislatively Required Continuing Education.</i></p> <p>Each agency, academy, or training provider shall maintain proof of a licensee’s completion of legislatively required continuing education training in a format currently accepted by the commission. The report of training shall be submitted to the commission within 30 days following completion of the training.</p> <p>The DPD Training Division SOP 812.01 <i>TCOLE Compliance Team.</i> The sergeant is the supervisor of the TCOLE Compliance Team and reports directly to the Use of Force Commander. The Sergeant is responsible for ensuring the academy is in compliance with the regulations set by TCOLE.</p>	<p>Satisfies</p>	<p>The DPD satisfies the TCOLE requirement to report police officer continuing education training hours within 30 days of completion.</p> <p>The DPD has appropriate control activities established through General Orders and / or SOPs to minimize the risk of noncompliance with TCOLE Reporting Standards for police officer continuing education. Specifically, the DPD has a TCOLE Compliance Team responsible for ensuring DPD reports police officer continuing education training within 30 days following completion of the training. The Compliance Team also maintains proof of police officer continuing education training.</p> <p>In addition, the Compliance Team’s duties include, but are not limited to: (1) providing oversight of instructional materials; (2) ensuring DPD training programs are consistent with TCOLE Standards; (3) auditing classes to ensure instructors are following lesson plans and are effective; and, (4) collecting student critiques of instructors. The Compliance Team also files a copy of the class audit and attendance with each lesson plan and maintains a copy in a central file; ensures lesson plans are updated and reviewed annually; and, conducts audits using TCOLE criteria.</p> <p>Without established SOPs to ensure DPD reports police officer continuing education hours within 30 days of completion, the risk would increase that DPD officers would not meet TCOLE Standards to maintain licensure.</p>	<p>None</p>

**United States Department of Justice (DOJ) Settlement Agreement
and Stipulated [Proposed] Order of Resolution with the City of Seattle³**

DOJ Consent Decree Standards / Agreements Related to Recruiting, Hiring, and Training	Auditor’s Design Assessment	Design Assessment Results	Recommendations
<p>Determine Appropriate / Relevant Courses to Provide</p> <p>The DOJ Settlement Agreement and Stipulated [Proposed] Order of Resolution with the City of Seattle (Agreement) specify appropriate / relevant courses for police academy basic training and police officer continuing education.</p>	<p align="center">Satisfies</p>	<p>The Dallas Police Department (DPD) <u>satisfies</u> the requirement to determine appropriate / relevant courses to provide.</p> <p>The DPD has control activities established through General Orders and / or Standard Operating Procedures (SOP) to help ensure DPD meets best practices as defined in the Agreement, as well as TCOLE Standards for determining DPD Police Academy Basic training and police officer continuing education training. For example, the DPD Police Academy offers courses in: (1) Use of Force; (2) Stops and Detentions; (3) Bias-Free Policing; (4) Crisis Intervention; (5) Human Trafficking; (6) Engaging the Community; (7) Recordkeeping; and, (8) Reality Based Training. Reality Based training is defined as any type of simulation training that prepares an individual for future performance through <i>experiential learning</i>.</p> <p>Without appropriate and relevant course offerings, the City of Dallas (City) risks exposure to Civil Rights violations by DPD police officers.</p>	<p align="center">None</p>

³ The DOJ Consent Decree Requirements – According to DPD, the DOJ and the City of Seattle Agreement are used by DPD as sources for best practices and procedures for police management; therefore, these sources were used by the auditors as criteria to assess DPD’s policies and procedures related to recruiting, hiring, and training.

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

DOJ Consent Decree Standards / Agreements Related to Recruiting, Hiring, and Training	Auditor’s Design Assessment	Design Assessment Results	Recommendations
<p>Use of Force</p> <p>The Agreement, Section III. A. (1) Use of Force Principles – Police officers shall be properly trained in use of force. Officers’ actions should increase public safety, be effective and constitutional, and embrace principles of procedural justice. In order to achieve this balance in the application of force, the police department commits: (a) to maintaining a police force that is highly trained and knowledgeable, not only on matters of law and professional standards on use of force, but also on matters of reporting, investigating, and reviewing uses of force; and, (b) to engaging with and educating the public on the appropriate use of force.</p> <p>The Fourth Amendment to the United States Constitution reads: <i>“The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.”</i></p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> the Use of Force Principles, weapon specific policies, and Use of Force Reporting and Investigation.</p> <p>The DPD General Orders / SOPs and the DPD Police Academy Basic Training includes 62 training hours that conform to the DOJ requirements for Use of Force Principles, weapon specific policies, and Use of Force Reporting and Investigation. In addition, the DPD provides police officer continuing education training related to use of force.</p> <p>The Use of Force Training provided by the DPD Police Academy and described in DPD’s SOPs is also consistent with the Fourth Amendment, <i>Search and Seizure</i>, of the United States Constitution which requires seizure (in this case, use of force) to be reasonable.</p> <p>Without proper training on Use of Force Principles, weapon specific policies, and Use of Force Reporting and Investigation, DPD officers’ safety is jeopardized and the potential for adverse community relations and Civil Rights violations are increased.</p>	<p>None</p>

Audit of the Design of Controls over the Dallas Police Department’s Police Personnel and Training Services

DOJ Consent Decree Standards / Agreements Related to Recruiting, Hiring, and Training	Auditor’s Design Assessment	Design Assessment Results	Recommendations
<p>Community Committees</p> <p>Police departments engage the community and develop positive relationships with diverse community groups. Police departments need strong community relationships and sustainable dialogue with diverse communities to ensure constitutional and bias-free policing, to closely interact with the community to resolve neighborhood problems, and to increase community confidence in the department.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> the DOJ requirement for community engagement.</p> <p>The DPD demonstrates the importance of DPD police officers connecting with the community to increase transparency and officer accountability and to improve officer safety. Specifically, the DPD created the: (1) DPD website; (2) the Citizens Police Review Board (CPRB); (3) the Community Support Coalition Committees (the seven committees are: Deadly Force / Use of Force; Youth; Mental Health / Homeless; Policy; Recruiting; Training; and, Officer Well-Being); (4) the Officer Involved Shooting Data on the DPD website; (5) Coffee with Cops; and, (6) the Youth Programs. All of these make information available to the public which conforms to the Executive Staff Briefing on the DOJ consent decree requirements for the City of Seattle for police proactively and consistently engaging the community.</p> <p>Without strong community relationships, DPD officer safety is jeopardized and the potential for adverse community relations and Civil Rights violations are increased.</p>	<p>None</p>
<p>Supervision</p> <p>Police departments shall provide adequate supervision to ensure an officer follows his / her training in the field. The police department will employ sufficient first-line supervisors (typically sergeants) to assure that first-line supervisors are able to: (1) respond to the scene of uses of force as required by this Agreement; (2) investigate each use of force in the manner required by this Agreement; (3) ensure documentation of uses of force as required by this Agreement; and, (4) provide supervision and direction as needed to officers employing force.</p>	<p>Satisfies</p>	<p>The DPD <u>satisfies</u> the DOJ Supervision requirement.</p> <p>The DPD has General Orders and / or SOPs to minimize the risk that DPD Police Officers are not adequately supervised. For example, DPD has documented procedures for Supervision in SOP 433, <i>Personnel Development Program</i>; SOP 500.00, <i>Internal Investigations</i>; and SOP 900, <i>Response Continuum</i>. The DPD also has documented procedures for Crisis Intervention in SOP 315.00, <i>Arrests Requiring Special Handling</i>; SOP 901.00, <i>Response Continuum</i>; SOP 905.00, <i>Drug Induced Psychosis/Excited Delirium</i>; and, SOP 908.00, <i>Response to Resistance Reporting</i>.</p> <p>Without adequate supervision to ensure an officer follows his / her training in the field, the City risks exposure to Civil Rights violations by members of the DPD.</p>	<p>None</p>

Other Issues

Other Issues Noted Related to Recruiting, Hiring, and Training	Auditor's Design Assessment	Design Assessment Results	Recommendations
<p>Recruiting a Diverse Workforce of Highly Qualified Officers</p> <p>The Dallas Police Department's (DPD) Personnel and Development Division Standard Operating Procedure (SOP) includes the Recruiting Team's purpose, structure, duties, responsibilities, and procedures.</p> <p>The Commission on Accreditation for Law Enforcement Agencies (CALEA) requires accredited agencies to take specific measures to ensure their workforce mirrors that of their jurisdictions.</p> <p>The President's Task Force on 21st Century Policing, May 2015, Pillar 1: Building Trust & Legitimacy – Recommendation 1.8 (Recommendation 1.8) states: <i>"Law enforcement agencies should strive to create a workforce that contains a broad range of diversity including race, gender, language, life experience and cultural background to improve understanding and effectiveness in dealing with all communities."</i></p>	<p>Partially Satisfies</p>	<p>The DPD <u>partially satisfies</u> the DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting and the President's Task Force on 21st Century Policing, May 2015, Recommendation 1.8.</p> <p>The DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting provide an internal control framework to help ensure DPD recruits a diverse workforce of highly qualified officers. The DPD, however, can improve documentation that demonstrates compliance with this SOP and alignment with Recommendation 1.8. For example, for the period under audit, the DPD did not have a formalized Recruiting Plan that systematically documented: (1) specific timelines; (2) advertising plans; (3) measurable recruitment goals; and, (4) the results of DPD recruitment efforts compared to recruitment goals. As a result, DPD cannot readily demonstrate compliance with DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting and alignment with Recommendation 1.8.</p>	<p>Recommendation III</p> <p>We recommend the Chief of Police, in consultation with the City Attorney's Office, improves documentation to demonstrate compliance with DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting and the President's Task Force on 21st Century Policing, May 2015, Recommendation 1.8.</p>

Audit of the Design of Controls over the Dallas Police Department's Police Personnel and Training Services

Other Issues Noted Related to Recruiting, Hiring, and Training	Auditor's Design Assessment	Design Assessment Results	Recommendations
<p>Information Processing Efficiency</p> <p>Standards for Internal Control in the Federal Government by the Comptroller General of the United States (Green Book) Principle 11 – <i>Design Activities for the Information System</i> states: “Management designs the entity’s information system to obtain and process information to meet each operational process’s information requirements and to respond to the entity’s objectives and risks. An information system is the people, processes, data, and technology that management organizes to obtain, communicate, or dispose of information.”</p>	<p>Does Not Satisfy</p>	<p>The DPD does not satisfy information processing efficiency for capturing and reporting DPD Academy Basic Training and police officer continuing education training hours to Texas Commission on Law Enforcement (TCOLE) efficiently.</p> <p>The DPD’s process for capturing and reporting DPD personnel’s DPD Academy Basic Training and police officer continuing education training courses in the automated format required by TCOLE is inefficient. Specifically,</p> <ul style="list-style-type: none"> • The DPD records DPD Academy Basic Training and police officer continuing education training courses in a Microsoft Access database • The DPD records the same DPD Academy Basic Training and police officer continuing education training course in the Agency Web IWM Personnel Management Application • The DPD accesses TCOLE to obtain courses police officers took from external training providers and enters the information into the Agency Web IWM Personnel Management Application <p>In addition, DPD manually records the DPD Academy Basic Training and police officer continuing education training courses and maintains the information in paper file folders.</p> <p>Although each police officer is responsible for ensuring required continuing education hours are completed annually, DPD tracks and monitors this information to ensure all DPD police officers comply with required continuing education hours and the information is reported to TCOLE within 30 days, as required.</p> <p>Without an efficient automated system to capture and report DPD Academy Basic Training and police officer continuing education training courses, DPD increases the risk that training hours will not be reported accurately and timely; and, personnel time spent to maintain the manual system is not optimal.</p>	<p>Recommendation IV</p> <p>We recommend the Chief of Police implements an automated system to efficiently capture and report DPD Academy Basic Training and police officer continuing education training courses.</p>

Background

The Dallas Police Department (DPD) was created over 120 years ago. The current 3,522 sworn officers serve and protect approximately 1.3 million people in the City of Dallas (City). The DPD recruits, hires, and trains new police officers and provides on-going, continuing education training to its existing workforce to provide and maintain adequate police services. These activities are the responsibility of the DPD Personnel and Training Divisions which are organized under the DPD Administrative Bureau.

DPD Personnel Division

The DPD Personnel Division is responsible for recruiting and hiring new police officers for the City. Each year, the DPD Personnel Division handles approximately 1,200 applications for Police Officer Trainee positions. The DPD uses the Texas Commission on Law Enforcement (TCOLE) Standards as the criteria for its hiring practices. Police Officer applicants must pass extensive testing and vetting processes which begin with a Civil Service Exam and include interviews, physical fitness testing, a polygraph exam, and background checks.

In the past ten fiscal years, the DPD has experienced attrition rates averaging approximately 5.7 percent (see Table I below).

Table I

**Sworn Strength End of Fiscal Year
2006-2015**

Fiscal Year	Sworn Employees	Attrition	Attrition Rate (Percent)
2015	3,511 (projected)	106 (estimated 217)	6.1
2014	3,496	204	5.80
2013	3,519	215	6.20
2012	3,511	188	5.40
2011	3,690	203	5.60
2010	3,597	191	5.30
2009	3,389	186	5.49
2008	3,186	173	5.43
2007	3,018	176	5.83
2006	2,972	174	5.80

Source: DPD's April 13, 2015 Recruiting Overview for the Public Safety Committee

DPD Training Division

The DPD Training Division operates the DPD Police Academy to train and certify new recruits to become licensed peace officers and to provide continuing education training to help ensure DPD sworn officers comply with TCOLE Standards. The DPD Training Division is responsible for training approximately 175 new recruits in three DPD Police Academy classes each year. The TCOLE certified the DPD Police Academy to train police recruits to take their State of Texas required certification exams to become a police officer. According to DPD, the DPD Police Academy's 1400-hour training program exceeds the training standards of any other city in the United States. The TCOLE Basic Peace Officer course requirement is 643 classroom hours; however, DPD requires an additional 757 hours before training is complete.

DPD General Orders and Standard Operating Procedures

The DPD General Orders and Standard Operating Procedures (SOP) are documents that establish and define policies, procedures, rules, and regulations governing DPD operations or activities.

Texas Commission on Law Enforcement

The Texas Commission on Law Enforcement (TCOLE) is the State of Texas agency responsible for establishing and enforcing rules related to the oversight of Texas law enforcement agencies.

United States Department of Justice

The Civil Rights Division of the Department of Justice (DOJ) negotiates and files consent decrees with police departments found to be engaged in a pattern or practice that violates the Constitution and Federal law. These consent decrees list the police services that must be delivered in a manner which complies with the Constitution, ensures public and officer safety, and promotes citizen confidence in the police department.

Management's Response to the Report

Memorandum

RECEIVED

SEP 29 2016

City Auditor's
Office



DATE: September 26, 2016
TO: Craig D. Kinton, City Auditor
SUBJECT: Response to Audit Report:
Audit of the Design of Controls over the Dallas Police Department's
Police Personnel and Training Services

Our responses to the audit report recommendations are as follows:

Recommendation I

We recommend the Chief of Police ensures the Training Advisory Board Members' files include evidence: (1) the Chief of Police approved the appointment of each Advisory Board member; (2) of each Advisory Board member's biography; and, (3) Advisory Board training is completed within one year of appointment.

Management Response / Corrective Action Plan

Agree Disagree

The Training Advisory Board composition was adjusted September 2015. Appointment, documentation and training were done in accordance with TCOLE provisions. This information was included in the Training Renewal Contract application to TCOLE. The DPD Academy contract with TCOLE as a basic training provider was renewed March 2016.

Implementation Date

September 2015

Responsible Manager

Deputy Chief Jeff Cotner

Recommendation II

We recommend the Chief of Police develops and implements an SOP that defines the DPD Police Academy instructor qualification requirements to align with TCOLE standards.

Management Response / Corrective Action Plan

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**Audit of the Design of Controls over the Dallas Police Department's
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Agree Disagree

The Training Division SOP has been amended to reflect the long standing practice that Academy staff is required to have a TCOLE Instructor Certificate.

Implementation Date

February 2016

Responsible Manager

Deputy Chief Jeff Cotner

Recommendation III

We recommend the Chief of Police, in consultation with the City Attorney's Office, improves documentation to demonstrate compliance with DPD's Personnel and Development Division Standard Operating Procedure sections related to recruiting and the President's Task Force on 21st Century Policing, May 2015, Recommendation 1.8.

Management Response / Corrective Action Plan

Agree Disagree

The Police Department will consult with the City Attorney's Office on improving documentation to demonstrate compliance the Personnel and Development Standard Operating Procedure as its relates to recruiting. The Department will also incorporate Recommendation 1.8 of the President's Task Force on 21st Century Policing into the Personnel and Development SOP.

Implementation Date

April 1, 2017

Responsible Manager

Deputy Chief Scott Walton

Recommendation IV

We recommend the Chief of Police implements an automated system to efficiently capture and report DPD Academy Basic Training and police officer continuing education training courses.

Management Response / Corrective Action Plan

Agree Disagree

DPD Training Division will submit a request with Communication and Information Services for a software application to capture training data more efficiently and

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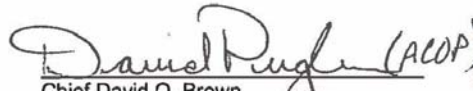
**Audit of the Design of Controls over the Dallas Police Department's
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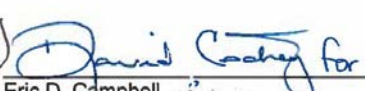
effectively. The submission will be part of a master request by DPD toward improving personnel recordkeeping.

Implementation Date
To be determined

Responsible Manager
Deputy Chief Jeff Cotner

Sincerely,


Chief David O. Brown
Dallas Police Department


Eric D. Campbell
Assistant City Manager

C: