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Finance
Internal Audit

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May 30, 2017

REPORT #: 2017-06

Robert Castro, Police Chief
Police Department

Dear Robert,

Enclosed is the final audit report for the Glendale Police Department Recruiting, Hiring, and Backgrounds Audit. Internal Audit would like to thank you and your staff for the support and assistance provided to us during the audit.

Should you have any questions, please feel free to contact Natalie Minami-Valdivia or myself.

Thank you,

Jessie Zhang
Acting Internal Audit Manager

Enclosure

cc: Yasmin Beers, Assistant City Manager
       Danny Carver, Police Lieutenant
       Robert Elliot, Director of Finance
       Michele Flynn, Assistant Director of Finance
       Jeffrey Hoover, Police Sergeant
       Scott Ochoa, City Manager
       Carl Povilaitis, Deputy Police Chief
       City Council
       Audit Committee

Glendale Police Department Recruiting, Hiring, and Backgrounds Audit

May 30, 2017

Background

In accordance with Internal Audit's fiscal year 2016-17 annual work plan, Internal Audit performed an audit of the Glendale Police Department's (GPD's) recruiting, hiring, and background processes.

Under the supervision of Professional Standards Bureau (PSB) Lieutenant, the GPD recruiting, hiring, and backgrounds processes are the responsibility of the PSB – Personnel Unit. This unit is responsible for performing the recruitment, hiring, and background investigations for all GPD positions, including Police Officer Recruits, Police Officer Laterals, Police Communication Operators, Police Custody, Community Service Officers, Reserve Police Officers, Cadets, Volunteers, and other City department personnel. This unit currently consists of a Police Sergeant, two Police Officers, and four City Resource Specialists. In addition to these employees, there is one Police Officer assigned to the PSB Training unit that performs very limited background investigations primarily on Police Cadets and Reserve Police Officers.

The pre-employment background investigation of peace officers is mandated by Government Code §1031 and is also included within the California Commission on Peace Officer Standards and Training (POST) Regulation 1953. The purpose of the background investigation requirement is to assure compliance with the minimum standards for appointment and to screen out candidates who are found unsuitable for the positions in question. The POST regulations are minimum standards and agencies may choose more rigorous selection criteria at their discretion.

All GPD personnel conducting background investigations received POST background investigator training and attend periodic updates.

The recruiting, hiring, and backgrounds process include the following:

- Marketing/Recruiting
- Application
- Physical Agility Test (PAT)
- Written Exam
- Optional Orientation Class
- Oral Interview
- Bilingual Interview (if applicable)
- Eligible List
- Background Investigation
- Chief Interview
- Employee Requisition
- Psychological & Medical Exam

In an effort to increase GPD's recruitment, the PSB – Personnel unit increased its participation in recruiting events by 180% from 5 in calendar year 2015 to 14 in calendar year 2016. The 2016 recruiting events included a military base, a high school, two community colleges, a university, and community events. Additionally, positions were advertised on PoliceOne, PORAC.org, POST, Asbarez, Korean Daily, Korean Times, and Governmentjobs.com.
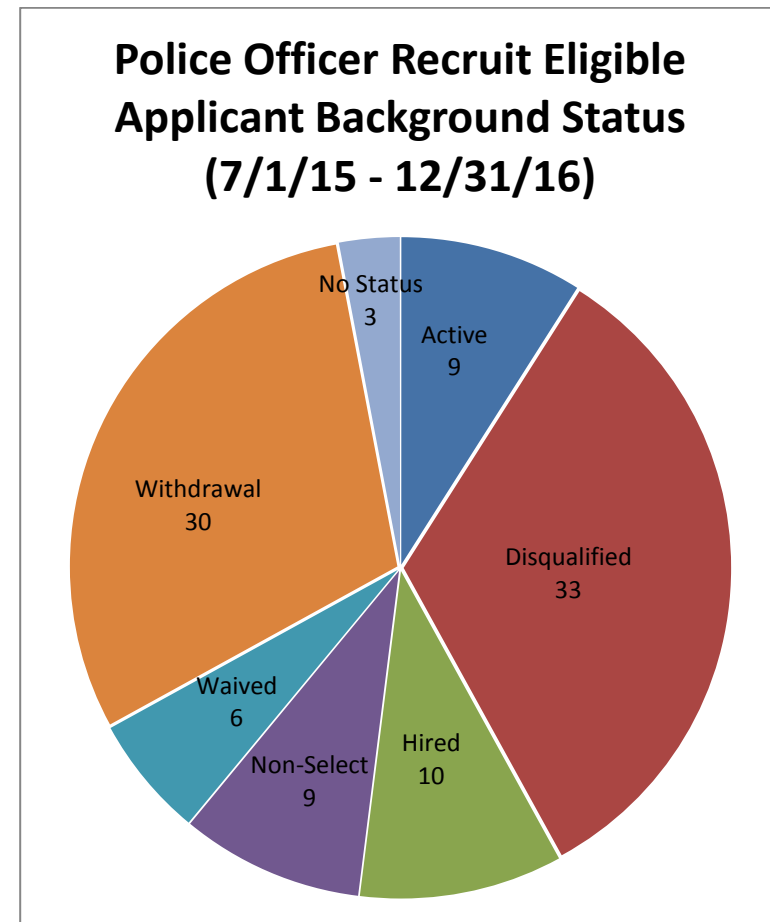
During the period of July 1, 2015 – December 31, 2016, there were 2,639 Police Officer Recruit applications received through neogov.com, an automated on-demand

public sector human resources hiring and onboarding software used by the City of Glendale. Of these applicants, 444 (17%) attended the City's scheduled PAT and/or written exam, 23 (1%) withdrew from the recruitment process, and 2,085 (79%) no showed, and 87 (3%) were disqualified because they did not meet the minimum requirements. Of the 444 applicants that attended the PAT and/or written exam, 100 made the Police Officer Recruit eligible list that was provided by Human Resources to GPD PSB – Personnel unit to perform the applicant's background investigation.

For those applicants included in the eligible lists, there are the following seven available final dispositions:

1. Disqualified – Applicant did not meet the standards and requirements established for the GPD.
2. Withdrawal – Applicant elected to withdraw his/her application.
3. Hired – Applicant was hired.
4. Active – Background investigation is in process.
5. Non-Select – At the discretion of the police department, the applicant was not selected and was removed from that particular eligible list.
6. Waived – Applicant elected to waive his/her participation in the current recruitment and may remain on the eligible list for two years.
7. No Status – There was no record or no status for these applicants. See issue #8 for more details.

The following chart depicts the final disposition of the 100 Police Officer Recruits that made the eligible list as of February 9, 2017:

Police Officer Recruit Eligible Applicant Background Status (7/1/15 - 12/31/16)

- No Status 3
- Active 9
- Disqualified 33
- Hired 10
- Non-Select 9
- Waived 6
- Withdrawal 30

POST has been charged with the responsibility to conduct compliance inspections to verify that persons appointed as peace officers were selected in accordance with the selection standards. The last POST audit was conducted on July 7, 2016. The objective of the POST audit was to assess GPD's compliance with POST standards for selection and training. The audit included the inspection of the agency roster, training standards, and selection standards. Out of the 15 GPD background investigation files reviewed for 17 different attributes, there was one compliance comment. This compliance comment was the result of a requirement change from previously allowing birth certificate abstracts to requiring birth certificates. Since POST conducts regular audits of GPD's compliance with its standards, POST compliance was not included within the scope of this audit.

Objective, Scope and Methodology

The primary objectives of this audit were to assess internal controls for the PSB recruiting, hiring, and backgrounds processes and determine whether alternative approaches are available to increase the efficiency and effectiveness of these processes.

The scope for this audit was GPD recruiting, hiring, and backgrounds performed for Police Officer Recruits for the timeframe of July 1, 2015 to December 31, 2016.

In order to accomplish the audit objectives, Internal Audit performed the following:

- Performed a walk-through of the recruiting, hiring,

and backgrounds processes performed by the background investigators, PSB Personnel Sergeant, PSB Lieutenant, Human Resources Analyst, and Employee Health Coordinator.

- Obtained and reviewed the GPD PSB Background Policy.

- Obtained and reviewed POST guidelines and the latest POST audit report.

- Performed detailed testwork on eligibility lists, background investigation database records, hiring and background processing times, and GPD complement report for completeness and efficiency.

In order to identify processes where efficiencies can be gained, we reviewed the days elapsed between the key hiring and background related processes. For our testwork purposes, we established reasonable timeframes with PSB management ranging between 7 and 14 days with a total target of 90 days for background related processes.

Summary of Results

We gathered and evaluated information on GPD's recruiting, hiring, and backgrounds processes. It was identified that GPD has not updated policies and procedures for the recruiting, hiring, and backgrounds processes since the last Background Policy was written in 2007.

GPD utilizes SharePoint to track its background investigations. Currently, the SharePoint backgrounds database fields are limited and do not capture all of the

critical background process dates. Based upon our review of the SharePoint backgrounds database for the period of July 1, 2015 – December 31, 2016, we further noted that the fields currently available are inconsistently entered into the database. In addition to SharePoint, PSB utilizes FileMaker Pro to track all GPD personnel information, including but not limited to their training records, access keys, and issued equipment. The new hire information entered into this database is used to register Police Officer Recruits and/or new personnel with POST and enable them to participate in their training programs.

In order to identify areas to improve efficiency and shorten the overall process, the average days elapsed for the different background processes was calculated based upon a manual review of the background files for a sample of 25 applicants. Based upon this sample, there were three applicants that made it through the entire process from application to hire in an average 234 days. There were four applicants that made it through the background process from the eligible date to the completion of the background binder in an average of 101 days. Please note that the averages above did not include background investigations of applicants that were not hired.

The result of the average days elapsed for the different hiring and background processes from the application date to the last process completed is listed in the table to the right. Based upon the 25 applicants reviewed, the background processes averaged 114 days from when the eligible list was generated to background completion. The cumulative average of the various processes for all 25 sampled applicants was 258 days.

Average Days Elapsed for Police Officer Recruit Hiring and Background Processes

Process	Average Days Elapsed Between Processes	Cumulative Hiring/ Background Process Days
Application Received	-	-
Recruitment Close	17	17
PAT/Written Exam	29	46
Oral Interview[1]	30	76
Eligible List Generated	10	86
Background Assignment [2, 3]	11	97
Background Interview [2]	19	116
Polygraph [2]	17	133
Background Completion [2]	67	200
Background Binder Review	12	212
Chief's Interview	7	219
Psychological Exam	8	227
Medical Exam	7	234
Hire Date[4]	24	258

[1] In 2016, oral interviews were delayed partially due to other GPD recruitments including a Captain, Lieutenant, and Sergeant recruitment.
[2] Denotes background investigation related processes totaling 114 days.
[3] The average days elapsed between the eligible list date and the background assignment date includes those applicants whose background assignments were postponed pending the completion of previously assigned backgrounds.
[4] The average days elapsed between the medical exam and hire date is dependent upon the pre-academy start date and the applicants' minimum two-week notice to their current employer.

Overall, we found the recruiting, hiring, and background processes are generally performed in an effective manner. However, based upon walk-throughs and testwork conducted, areas for improvement in the efficiency and effectiveness of operations were identified. These observations are summarized by risk rating in the chart that follows and are included in the Observation, Recommendation, and Management Response Section of this report.

| **Priority 1** |
| Critical control weakness that exposes the City to a high degree of combined risks. |
| o   None. |

| **Priority 2** |
| Less than critical control weakness that exposes the City to a moderate degree of combined risks. |
| o   #1 - Incomplete/outdated recruiting, hiring, and background policies and procedures. |
| o   #3 - User access to the SharePoint backgrounds database and/or FileMaker Pro personnel database is not inactivated in a timely manner. |
| o   #8 - Lack of controls to ensure that all eligible applicants are assigned for background investigation. |
| o   #9 - Inconsistent utilization of the LexisNexis background resource tool. |

| **Priority 3** |
| Opportunity for good or better practice for improved efficiency or reduce exposure to combined risks. |
| o   #2 - Benchmarks have not been formally documented, communicated, or measured. |
| o   #4 – A separate recruiting budget line item has not been established. |
| o   #5 – Making the background packet available online and following-up with candidates that attend recruiting events could enhance the current recruitment process. |
| o   #6- Hiring effectiveness can be improved by pre-scheduling exams and following-up with applicants that have withdrawn from the recruitment prior to the generation of the eligible list. |
| o   #7 – Potential areas to improve efficiency in the hiring processes were identified. |
| o   #10 - Inconsistent/incomplete input of background investigation process status into the SharePoint backgrounds database. |
| o   #11 – Potential areas to improve efficiency in the background processes were identified. |

Item	Observation/Risk	Recommendation	Management Response
General Administrative			
Priority 2 — 1.	Based upon a walk-through of the recruiting, hiring, and backgrounds processes, we noted that the PSB - Personnel Unit has a background policy that requires updating. Specifically we noted that the policies and/or procedures should be updated to include the following: • A methodology for tracking the effectiveness of the recruiting events. • The methodology for prioritizing background investigations. • The minimum frequency that a background investigator should be in contact with the applicant. • Whether and when secondary references should be contacted. • Timing of the completion of employee requisitions to expedite the hiring process and to comply with City policy.	It is recommended that GPD PSB management update its background policy to include, but not be limited to, the following: • Methodology for tracking the effectiveness of the recruiting events. • Methodology for prioritizing background investigations. • Minimum frequency that a background investigator should be in contact with an applicant. • Secondary references. • Employee requisition creation and approval timing.	GPD PSB management agrees with the recommendation and will update the background policy and/or procedures. These policies and/or procedures will clarify that the methodology for prioritizing background investigations is based on the eligible list ranking along with organizational needs. The anticipated completion date is June 30, 2018.

	Item	Observation/Risk	Recommendation	Management Response
Priority 3	2.	PSB – Personnel Unit performance benchmarks have not been documented, communicated in writing, and/or measured. It should be noted that PSB had verbally communicated goals that included increasing recruiting events by 25% in calendar 2016 and the quarterly scheduling of the PAT/written exams in calendar year 2017. PSB exceeded its recruiting event goal by increasing its recruiting events from 5 in 2015 to 14 in 2016 (an increase of 180%) and has communicated a quarterly testing schedule to Human Resources (HR).	It is recommended that the PSB management formally document benchmarks, communicate them to personnel, and periodically review the personnel's performance against these benchmarks.	PSB management has verbally communicated the Personnel Unit's goals, but will formally document the benchmarks, communicate them to personnel, and periodically review the personnel's performance against these benchmarks. The anticipated completion date is December 31, 2017.
Priority 2	3.	Access to SharePoint and/or FileMaker Pro for retired, terminated, or transferred employees is not inactivated in a timely manner. Based upon a comparison of active user lists from these two databases to the active employee listing, we noted the following: • The SharePoint backgrounds database had 14 active users. Four of these users were retired/terminated employees.	It is recommended that PSB management implement the following to enhance access controls over the two databases: • Establish a PSB separation checklist to ensure that employees' access is inactivated in a timely manner. • Periodically review the SharePoint and FileMaker Pro user lists and access levels.	PSB management has completed a review of the SharePoint and FileMaker Pro user lists and made the appropriate changes. PSB management will establish a PSB separation checklist to ensure that separated/transferred employees access is inactivated in a timely manner and will periodically review the SharePoint and FileMaker Pro user access and privilege sets. The anticipated completion date is September 30, 2017.

Item	Observation/Risk	Recommendation	Management Response
	• The FileMaker Pro database had 93 active users. One generic user id with "Full Access" privileges is utilized by multiple Information Services Department (ISD) employees, 13 user id's were associated to retired/terminated employees and an additional 8 users in FileMaker Pro could not be agreed to the active employee listing within the City's HR system.	• Review and update the FileMaker Pro privilege sets.	

Recruiting

Item	Observation/Risk	Recommendation	Management Response
Priority 3	4. Although recruiting is a priority for GPD, a separate recruiting expense account or budget line item has not been established. A separate recruiting budget would enable PSB to better plan their annual recruitment to meet the targeted number of recruiting events based upon the anticipated recruiting event participation fees and any necessary personnel overtime.	It is recommended that PSB management establish a separate recruiting budget line item for better planning and tracking purposes.	PSB management agrees with the recommendation and will assess the recruiting events to be attended, make adjustments to the current fiscal year maintenance and operations budget, and/or will make any necessary adjustments in fiscal year 2019. The anticipated completion date is June 30, 2018.

Item	Observation/Risk	Recommendation	Management Response
Priority 3 5.	Based upon a walkthrough of the recruiting process, research, and comparison to other city websites, we noted the following: • The background packet is not available online to enable applicants to gather required documents to schedule the background interview and ultimately leads to delays in the background investigation process. • No follow-up is performed with the candidates that visited and signed-in at GPD's recruiting events. • Statistics on the survey results collected on how the applicant learned about GPD are not tabulated or reviewed.	It is recommended that PSB management perform the following to improve the effectiveness of the recruiting process: • Determine the feasibility of providing the background packet online to enable applicants to gather required documents and expedite the background investigation process. • Follow-up with candidates that visited the GPD recruiting events. • Request and obtain a statistical report from HR on the survey results collected on how the applicant learned about GPD, the number of submitted applications, the number of withdrawn applications, the reason that the applicant withdrew, and the number of disqualified applications.	PSB management agrees with the recommendations and has begun distributing the background packet to all candidates upon completion of the oral exam. PSB management will consider the feasibility of the following: • Providing the background packet online to enable applicants to gather required documents and expedite the background investigation process. • Following-up with candidates that visited the GPD recruiting events. • Requesting and obtaining a statistical report on the survey results collected. The anticipated completion date is December 31, 2017.

	Item	Observation/Risk	Recommendation	Management Response
Hiring				
Priority 3	6.	Based upon a review of the hiring processes, we noted the following: • Applicant testing schedule is not pre-established and/or published online in order to provide advanced notice for scheduling purposes. • The written exam is not currently offered at different locations or at recruiting events. • Follow-up is not performed to determine the reason that an applicant has withdrawn from the hiring process prior to generating the eligible list.	It is recommended that GPD consider the following in order to improve the effectiveness of the hiring processes: • Schedule a rolling year of PAT and written exams and make the dates available to the applicants. • Determine the feasibility of offering applicants the option to test at the recruiting event or utilize a computer based testing facility for the written exam. • Request HR contact the applicant to determine and document the reason for the applicant's withdrawal.	GPD management agrees with the recommendation and will perform the following: • Establish a schedule with a rolling year of PAT and written exams and make the dates available to the applicants. • Determine the feasibility of offering applicants the option to test at the recruit event or to utilize a computer based testing facility for the written exam. • Request HR to contact the applicant to determine and document the reason for the applicant's withdrawal. The anticipated completion date is December 31, 2017.
Priority 3	7.	Based upon the detailed testwork performed on a sample of 25 Police Officer Recruits, we noted the following potential areas to improve the efficiencies in the hiring process from comparing the days elapsed to the targeted days: • 25 (100%) of the PAT were	It is recommended that GPD management perform the following: • Work with HR to establish a calendar of recruitment close dates, PAT/Written exams, and oral interviews. • Set-up additional fields within the background database to	GPD management agrees with the recommendation and has established a calendar of PAT/written exams and oral interview dates. GPD management will work with ISD to evaluate whether it would be more cost-effective and/or efficient

Item	Observation/Risk	Recommendation	Management Response
	conducted greater than 14 days from the recruitment close date, ranging from 22 to 37 days. • 25 (100%) of the oral interviews were conducted greater than 14 calendar days from the PAT/written exam, ranging from 26 to 33 days. • 20 (80%) eligible dates were greater than 7 calendar days from the oral interview date, ranging from 9 to 14 days. • 2 (8%) Psychological Exams were conducted greater than 7 days from the Chief's interview, ranging from 8 to 13. • 1 (4%) Medical Exam was conducted greater than 7 days from the Psychological Exam, completed in 14 days.	record the date and results of relevant status information including, but not limited to, the Chief's interview, psychological exam, medical exam, and hire date.	to modify the current SharePoint backgrounds database or purchase off-the-shelf background software. The anticipated completion date is June 30, 2018.

Backgrounds

Item	Observation/Risk	Recommendation	Management Response
8. Priority 2	Controls are inadequate to ensure that all eligible applicants are assigned for background investigation. Based upon testwork performed on the 100 Police Officer Recruit candidates included on the Eligible Lists for July 1, 2015 - December 31, 2016, we noted the following:	It is recommended that the PSB - Personnel unit work with the ISD to determine the feasibility of uploading the eligible list into the SharePoint backgrounds database. In the event that the list cannot be uploaded, it is recommended that the entire list be entered into the SharePoint backgrounds database	GPD management agrees with the recommendation and will work with ISD to determine the feasibility of uploading the eligible list information into the SharePoint backgrounds database. The anticipated completion date is June 30, 2018.

Item	Observation/Risk	Recommendation	Management Response
	• 3 applicants on the eligible list could not be located within the SharePoint backgrounds database. Two of these applicants were not included within the eligible lists provided to PSB and had not been background checked. One applicant was included on the eligibility list provided to PSB but had no record of assignment or final disposition included within the SharePoint backgrounds database.	upon receipt of the list and reviewed for completeness.	
	• 10 applicant names were inconsistently entered within the eligible list and SharePoint backgrounds database.		
	• 2 applicants were erroneously entered as Police Officer Recruit candidates rather than as a Volunteer or Police Officer Lateral.		
	• 4 applicants had multiple background investigation records entered within the SharePoint backgrounds database.		

	Item	Observation/Risk	Recommendation	Management Response
Priority 2	9.	The LexisNexis background investigation resource tool was not consistently utilized and the report was not included within the background investigation files.	It is recommended that a procedure and/or checklist be established to ensure that all background investigation resource tools are utilized and the reports from these are generated and reviewed in a consistent manner.	GPD management agrees with the recommendation and will establish a procedure and/or checklist to ensure that all background investigation resource tools are consistently utilized and the reports generated, reviewed, and included within the applicant's background file. The anticipated completion date is September 30, 2017.
Priority 3	10.	Based upon the detailed testwork performed on a sample of 25 Police Officer Recruits, we noted inconsistent and/or incomplete information is entered into the SharePoint backgrounds database. • 2 (8%) background assignment dates were not recorded within the SharePoint backgrounds database. • 7 (28%) background assignments were assigned based upon the oral exam raw scores that preceded the eligible list date. • 4 (16%) backgrounds did not have a background binder	It is recommended that GPD management perform the following: • Establish a desk procedure to specify the information to be entered into the SharePoint backgrounds database. • Determine the critical information/dates to be captured within the SharePoint backgrounds database and work with ISD to set-up the additional fields. or Determine the feasibility of purchasing off-the-shelf software to assist PSB in obtaining and tracking	GPD management agrees with the recommendation and will perform the following: • Establish a desk procedure to specify the information to be entered into the SharePoint backgrounds database. • Determine the critical information/dates to be captured within the SharePoint backgrounds database and evaluate the options to better track background information. • Implement a review process to ensure that required information is appropriately captured within the SharePoint backgrounds database.

Item	Observation/Risk	Recommendation	Management Response
	completion date recorded within the SharePoint backgrounds database. Based upon additional testwork performed, we also noted that the criminal and personal reference check letters did not consistently evidence a date, and background investigation related correspondence is not date-stamped upon receipt.	background information. • Implement a review process to ensure that required information is appropriately captured within the SharePoint backgrounds database. • Ensure a date is included on all correspondence mailed out. • Date stamp all background investigation related correspondence upon receipt.	• Ensure a date is included on all correspondence mailed out. • Date stamp all background investigation related correspondence upon receipt. The anticipated completion date is June 30, 2018.
11.	Based upon the detailed testwork performed on a sample of 25 Police Officer Recruits, we noted there are efficiencies to be gained in the background process. More specifically, we noted the following: • 11 (44%) background interviews were conducted greater than 14 calendar days from the background assignment date, ranging from 16 to 49 days. • 3 (12%) polygraphs, scheduled by the applicant, were conducted greater than 14 calendar days from the background interview, ranging from 16 to 37 days.	It is recommended that GPD management perform the following: • Establish and communicate a guideline to the applicant for the submission of background packets and scheduling of their background interview. • Schedule the applicant's polygraph at the conclusion of the background interview. • Establish a target timeframe for each of the background investigation processes. • Work with ISD to establish periodic background investigation status reports to	GPD management agrees with the recommendation and will perform or has performed the following: • Establish and communicate a guideline to the applicant for the submission of background packets and scheduling of their background interview. • The scheduling of the applicant's polygraph at the conclusion of the background interview was implemented as of January 2017. • Establish a target timeframe for each of the background investigation processes. Although the 7 to 14 day timeframes are reasonable for

Priority 3

Item	Observation/Risk	Recommendation	Management Response
	• 3 (12%) backgrounds took greater than the targeted 90 calendar days to be completed, ranging from 98 to 143 days. • 1 (4%) background binder took greater than 14 days to be reviewed by the PSB Sergeant, PSB Lieutenant, Deputy Police Chief, and Police Chief, completed in 20 days. Based upon additional testwork performed, we identified the following: • The mailing of criminal checks, personal reference letters, employment verifications, and the generation of background investigation resource reports and the selective service checks were not consistently completed within 7 days of the polygraph, ranging from 11 to 95 days. • The residential and neighborhood checks were not performed within 14 days of the polygraph, ranging from 18 to 95 days.	monitor and identify potential process inefficiencies. • Establish and document a procedure/guideline for the order that the background investigation processes should be completed and the frequency at which follow-up should be performed (i.e. generation of the background investigation resource reports within 7 days of the polygraph, mailing of the reference letters within 14 days of the polygraph, and performing/documenting follow-up on reference and criminal checks not received within 14 calendar days).	local applicants, it should be noted that out-of-state neighborhood checks may take in excess of 14 days of the polygraph to be completed. • Work with ISD to establish periodic background investigation status reports to monitor and identify potential process efficiencies. • Establish and document a procedure/guideline for the order that the background investigation processes should be completed and the frequency that follow-up should be performed. The anticipated completion date is June 30, 2018.

Item	Observation/Risk	Recommendation	Management Response
	• There was no documentation of follow-up on reference checks not received within 14 days of mailing, ranging from 16 to 49 days.		