

LOS ANGELES POLICE COMMISSION

TRAINING EVALUATION AND MANAGEMENT SYSTEM (TEAMS) II AUDIT, PHASE I (Fiscal Year 2008/2009)



Conducted by the

OFFICE OF THE INSPECTOR GENERAL

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**OFFICE OF THE INSPECTOR GENERAL
FISCAL YEAR 2008/2009
TRAINING EVALUATION AND MANAGEMENT SYSTEM II AUDIT, PHASE I**

PURPOSE

Pursuant to Consent Decree Paragraph 137, the Office of the Inspector General (OIG) conducted a Training Evaluation and Management System (TEAMS) II Audit (Audit). Specifically, Paragraph 137 requires the Inspector General to audit the quality and timeliness of the Los Angeles Police Department's (LAPD or Department) use of TEAMS II and to evaluate the Department's compliance with Consent Decree Paragraph 47.

BACKGROUND

This is the third TEAMS II Audit conducted by the OIG. The first TEAMS II Audit (Phase I), issued in November 2007, primarily focused on *system*-generated action items. The second TEAMS II Audit (Phase II), issued in June 2008, primarily focused on *supervisor*-generated action items (SAIs). This third TEAMS II Audit (Phase I) again primarily focused on *system*-generated action items (AIs), as well as disputed data correction requests in the Complaint Management System (CMS) and Use of Force System (UOFS), and Organizational Performance Assessments (OPAs).

An AI is automatically generated by the Risk Management Information System (RMIS) within TEAMS II when an employee has an inordinate number of uses of force, complaints, vehicle pursuits, preventable traffic collisions, or claims/lawsuits in comparison to his/her peer group. Indeed, the Department's implementation of the AI process is the "heart" of the early warning system required by the Consent Decree. It allows Department supervisors and managers to review an employee's activity to evaluate whether the employee is exhibiting any type of potential "at-risk" behavior that should be addressed or monitored. It also allows the Department to evaluate whether an inordinate number of AIs are being generated within a particular organization, when compared to other organizations with similar responsibilities.

The relevant Consent Decree Paragraph 47 subparagraphs (**b, d, e, h, j₂, k & l**) for this Audit are summarized as follows:

- (b) When at-risk behavior may be occurring, supervisors and managers shall review officer's performance.
- (d) There shall be guidelines for the numbers and types of incidents requiring a TEAMS II review by supervisors and managers.
- (e) There shall be guidelines for the follow-up supervisory and managerial actions to be taken based on the TEAMS II reviews.
- (h) The actions taken shall be based on all relevant and appropriate information, and not solely on the number or percentages of incidents in any category in TEAMS II.
- (j₂) There shall be procedures for correcting data errors in TEAMS II.
- (k) There shall be evaluations of the performance of individual units, and the related comparison to other units with similar responsibilities.
- (l) Actions taken as a result of TEAMS II reviews shall be timely documented in TEAMS II.

In addition to the Consent Decree, the primary document governing AIs has been Special Order No. 22, 2007, "Duty to Conduct and Document Individual Performance Assessments," dated July 12, 2007. This Special Order provides Department supervisors and managers with information on how to complete AIs. It also provides details as to the various disposition types (e.g., "Comment Card," "Training," "Commendation," "No Action," etc.) that can be utilized, and when each disposition type should be used. In addition, Special Order No. 7, 2008, dated February 14, 2008, governs OPAs; and Department Manual Volume 3, Section 791 governs correcting disputed data in TEAMS II.

Note: On August 29, 2008, after this Audit's test work but before release of the Audit Report, the Department issued Special Order No. 28, 2008, "Duty to Conduct and Document Individual Performance Assessments – Revised," which superseded the aforementioned Special Order No. 22, 2007. Two primary purposes of this new Special Order were to: (1) Eliminate the requirement of generating SAIs when conducting reviews for annual performance evaluations and transfers; and, (2) Elaborate how supervisors should document their review of an AI.

SCOPE AND METHODOLOGY

Audit Objectives

The Audit's primary Objectives, and the related subparagraphs of Consent Decree Paragraph 47, were as follows:

Objective A - Determine if the AI narratives support that good-faith comprehensive reasonable reviews were performed, with the dispositions (including "No Action") adequately justified, and determine if evidence that the AI was discussed with the affected employee. (§47(b)&(h))

Objective B - Determine if evidence that the prescribed corrective follow-up actions were taken. (§47(e))

Objective C - Determine if AIs were timely completed within 30 days of generation date. (§47(l))

Objective D - Determine the extent to which thresholds and peer group settings have been modified since the previous audit. (§47(d))

Objective E - Determine if CMS and UOFS disputed data correction requests were processed timely and accurately. (§47(j₂))

Objective F - Determine if OPAs were adequate, and included comparison to other organizations with similar responsibilities. (§47(k))

Populations and Samples

For Objectives A and B, the OIG selected samples, with the size determined by using a one-tail confidence level of 95 percent, an expected error rate of six percent, and a plus-precision of seven percent. For Objectives C, D, E and F, sampling was not applicable, as the OIG wanted to analyze the entire population or whatever other data was available. Details are as follows:

- For Objective A (AI Reviews and Dispositions), two samples were randomly selected from the population of 1,236 AIs generated from January 1 to May 25 of 2008. The first sample was a Department-wide sample of 31 AIs, stratified by non-supervisory employees (27 AIs) and supervisory employees (4 AIs). It was noted that 29 of the 31 AIs had a disposition of “No Action,” one AI had a disposition of “Informal Meeting,” and one AI had a disposition of “Modified Field Duties.” Thus, a second sample was deemed necessary, so as to include more AIs with “corrective action” dispositions. This second (supplemental) sample was a Department-wide sample of 33 AIs generated from January 1 to May 25 of 2008, excluding all AIs with a disposition of “No Action,” “Informal Meeting” or “Commendation,” and stratified by non-supervisory employees (31) and supervisory employees (2). Thus, the total combined sample size, after eliminating one duplicate AI in both samples,¹ was 63.
- For Objective B (AI Follow-Up Corrective Action), a sample of 24 AIs was randomly selected from the population of 66 AIs generated from January 1 to May 25 of 2008, excluding AIs with a disposition of “No Action,” “Informal Meeting” or “Commendation,” and stratified by non-supervisory employees (22) and supervisory employees (2). The purpose of this test was to determine if the prescribed corrective action was taken. However, when it was later discovered that nine of the AIs in the sample had a “positive” “Comment Card” disposition (in effect, similar to the “Commendation” disposition), these nine AIs were replaced with AIs with “corrective action” dispositions (“Training,” “Assigned to Non-Field Duties,” etc.)
- For Objective C (Timeliness of Completion of AIs), the analysis covered all 278 AIs completed from May 25 to June 30 of 2008, and all 416 AIs open/pending at June 30, 2008. For Objective E (Disputed Data Correction), all 16 CMS disputed data correction requests (involving 15 complaints and 12 employees) made from November 1, 2007 through June 30, 2008, were audited. Also, all nine UOFS disputed data correction requests (involving six incidents and eight employees) made from November 1, 2007 through June 30, 2008, were audited. For Objective F (OPAs), the only OPA completed to date (OPA No. 1 – All Area Narcotics Detail Units (NEDs) Department-wide, completed in May 2008) was reviewed.

¹ No. 472417

OVERALL RESULTS OF THE AUDIT

The OIG found that the AI narratives supported that good-faith comprehensive reasonable reviews were performed, with the dispositions (including “No Action”) adequately justified. Also, there was evidence that the prescribed corrective follow-up actions were taken. Although some AIs were not timely completed, there was significant improvement since the prior audit.

All 16 CMS data correction requests were processed accurately, and only one was processed unreasonably late (130 days late). None of the nine UOFS data correction requests were timely processed with 30 days of request, ranging from 81 to 234 days late. However, all nine requests were eventually accurately corrected, and all nine related to six “old” use of force incidents occurring from 1984 through 1994, so would not affect current RMIS threshold activations that generate AIs. The one OPA completed was well done, and included the necessary analyses and comparisons.

DETAILED RESULTS OF THE AUDIT

Objective A - Determine if the AI narratives support that good-faith comprehensive reasonable reviews were performed, with the dispositions (including “No Action”) adequately justified, and determine if evidence that the AI was discussed with the affected employee.

Background

Consent Decree subparagraph 47(b) requires that when at-risk behavior may be occurring, appropriate supervisors and managers shall undertake a more intensive review of the officer’s performance. Consent Decree subparagraph 47(h) states that action taken as a result of information from TEAMS II shall be based on all relevant and appropriate information, and not solely on the number or percentages of incidents in any category recorded in TEAMS II.

In addition to the Consent Decree, Special Order No. 22, 2007, provides supervisors and managers with information on how to review and complete AIs. It also provides details as to the various disposition types (e.g., “*Comment Card*,” “*Training*,” “*Commendation*,” “*No Action*,” etc.) that can be utilized, and when each disposition type should be used. This Special Order also requires that the supervisor meet with the affected employee to discuss the AI, with the date of this meeting documented in the narrative of the AI.

As previously noted on Page No. 2, Objective A was tested using two randomly selected samples combining to a total of 63 AIs. The first sample was selected from a Department-wide population of all AIs generated from January 1 through May 25 of 2008, and the second sample was selected from a population of AIs with “corrective action” dispositions generated during the same time period. The dispositions assigned for these 63 AIs were “No Action” (29), “Comment Card” (8), “Training” (7), “Assigned to Non-Field Duties” (6), “Modified Field Duties” (3), “Complaint” (2), “Informal Meeting” (1), and multiple dispositions (7).

Testing Results

For all 63 AIs, the AI narrative supported that a good-faith comprehensive reasonable review was performed, with the final dispositions correctly reflected on the officer's TEAMS II record. Also, for 59 of the 63 (94%) AIs, the disposition was adequately justified, based on the OIG's review of the rationale in the AI narrative and the OIG's examination of the officer's TEAMS II record. Details of the four exceptions are as follows:

- For three sampled AIs,² the disposition of "Complaint" was used incorrectly, referencing the complaint which activated the threshold that generated the AI. The sample was expanded to include the other two AIs in the population with the "Complaint" disposition,³ and they also incorrectly referenced the complaint which activated the threshold that generated the AI. Special Order 22, 2007, states that the "Complaint" disposition is "used in the event misconduct is identified [during review of the AI] and a personnel complaint results." The Commanding Officer of TEAMS II Development Bureau confirmed that the "Complaint" disposition should only be used if a new complaint arises from the AI review, and should not be used to reference the complaint which activated the threshold that generated the AI.
- For one AI,⁴ the dispositions of "Assigned to Non-Field Duties" and "Directed BSS Referral" referenced actions taken prior to the generation of the AI. However, the only new action taken as a result of the AI was that the employee was not able to supervise probationary officers; however, the employee was still allowed to work in the field. Thus, the "Modified Field Duties" disposition should have been used instead.

For 51 of the 63 (81%) AIs, there was some indication in the AI narrative that the supervisor met with the affected employee to discuss the AI, although the date was not referenced for six of the 50. For 12 (29%) of the 63 AIs,⁵ there was no such indication that the supervisor met with the affected employee to discuss the AI.

Actions Taken by TEAMS II Development Bureau

Effective May 15, 2008, RMIS forces the first-level reviewer to write in the "date the supervisor served the affected employee," and then the related box is automatically checked. The AI can not be moved up the chain of command to the next level of review until this date is entered and the related box is automatically checked. This Audit examined a few "test" AIs to ensure that this control is working as intended.

To rectify the issue regarding supervisors incorrectly selecting the "Complaint" disposition to reference the complaint which activated the threshold that generated the AI, the proper selection of dispositions and the definition of each will be addressed during regular RMIS training. It will also be emphasized that the disposition selected should be based on the result, not the cause, of the AI review. Furthermore, TEAMS II Development Bureau is looking into adding another

² Nos. 474748, 468060 and 468301

³ Nos. 473931 and 469819

⁴ No. 471919

⁵ Nos. 473139, 472923, 474057, 469822, 469379, 475580, 473078, 474748, 469707, 469712, 473925 and 474630

disposition, “No Further Action,” to use when the appropriate disposition resulting from the review was an action already taken prior to the closeout of the AI. The supervisor will indicate, in the narrative or in a separate box, the action already taken and the date of the event.

Objective B - Determine if evidence that the prescribed corrective follow-up actions were taken.

Background

Consent Decree subparagraph 47(e) requires that follow-up managerial or supervisory actions (including non-disciplinary actions) be taken based on review of the information in TEAMS II.

As previously noted on Page 2, Objective B was tested using a randomly selected sample of 24 AIs generated from January 1 to May 25 of 2008, excluding AIs with a disposition of “No Action,” “Informal Meeting” or “Commendation.” Also, when it was later discovered that nine of the AIs in the sample had “positive” “Comment Card” dispositions (in effect, similar to the “Commendation” disposition), these nine AIs were replaced with “corrective action” dispositions. The dispositions assigned for the final sample of these 24 AIs were “Training” (7), “Assigned to Non-Field Duties” (6), “Modified Field Duties” (2), “Complaint” (2), and multiple dispositions (7).

Testing Results

For all 24 sample AIs, there was evidence that the prescribed corrective action was taken.

Other Matter

For AIs with a disposition of “Assigned to Non-Field Duties,” the OIG reviewed the officer’s “Event List” reports in RMIS to ascertain if the officer made any arrests or Stops, or issued any citations while he/she was assigned to non-field duties. This review disclosed that for three AIs in the sample involving two employees,⁶ arrests, citations and Stops were incorrectly credited to the affected employee, as follows:

- For one AI,⁷ the affected employee was incorrectly credited with making one arrest and seven Stops in May 2008 in the Central Division.
- For two other AIs involving the same employee,⁸ the affected employee was incorrectly credited with issuing a citation in January 2008 in the Central Division and making an arrest in March 2008 in the Central Division.

Note: The officer-in-charge of each affected employee stated that the aforementioned data was erroneous, in that the employee was not assigned or loaned to Central Division at the time, and was not involved in the aforementioned arrests/citations/Stops. It was not within

⁶ Nos. 474057, 466753 and 473630

⁷ No. 473925

⁸ Nos. 474057 and 466753

the scope of this Audit to expand testing to determine the extent of such errors Department-wide.

Actions Taken by TEAMS II Development Bureau

To address issues regarding erroneous data on an employee’s TEAMS II record, a data correction procedure has been in effect for several years, whereby commanding officers are responsible for completing a Data Correction form and sending the request to the appropriate entity for resolution. The entity⁹ then has 30 days from the date of request to provide a response to the requesting commanding officer.

To help ensure that the corrective actions prescribed by the AIs are taken (even though the Audit disclosed no exceptions in this area), TEAMS II Development Bureau is exploring the option of developing a separate follow-up action item to the supervisor for dispositions other than “No Action” or “No Action – Note for Annual Review Only.” For example, if a supervisor selects “Training” as a disposition, the supervisor will receive a follow-up action item, requiring the supervisor to note when the training was completed and what type of training was provided.

Objective C - Determine if AIs were timely completed within 30 days of generation date.

Background

Consent Decree subparagraph 47(l) requires routine and timely documentation in TEAMS II of actions taken as a result of reviews of TEAMS II information. Additionally, Special Order 22, 2007, requires that an AI be completed within 30 days after it is generated, unless an extension is approved by the commanding officer.

To test for timeliness of AI completion, the OIG analyzed both AIs open/pending as of June 30, 2008, and AIs completed from May 25 to June 30 of 2008.

Testing Results - Pending AIs

As of June 30, 2008, there were 416 pending AIs, with 178 (43%) of them past due. This percentage is similar to the prior audit results as of August 22, 2007, when 227 (45%) of the 502 pending AIs were past due. Of the 178 past-due AIs as of June 30, 2008, 32 (18%) were past due more than 60 days, ranging to 402 days past due. This is a significant improvement since the prior audit when as of August 22, 2007, 73 (32%) were past due more than 60 days. An “aging” of the 178 past-due pending AIs as of June 30, 2008, is as follows:

Aging Analysis of 178 Past-Due Pending AIs as of June 30, 2008

Days Past-Due:	<u>Less than 31 Days</u>	<u>31-60 Days</u>	<u>61-90 Days</u>	<u>Over 90 Days</u>
Quantity	106	40	16	16
Percentage	60%	22%	9%	9%

⁹ Records and Identification Division, Information Technology Division, and Civil Rights Integrity Division are the entities responsible for entering/maintaining data for arrests, citations, and Stops, respectively.

Testing Results – Completed AIs

Of the 278 AIs completed from May 25 to June 30 of 2008, 141 (51%) were completed late. Of these 141 AIs, 21 (15%) were completed more than 60 days late, ranging to 302 days late. An “aging” of the 141 AIs completed late is as follows:

Aging Analysis of 141 AIs Completed Late (completed from May 25 to June 30 of 2008)

Days Late:	<u>Less than 31 Days</u>	<u>31-60 Days</u>	<u>61-90 Days</u>	<u>Over 90 Days</u>
Quantity	92	28	11	10
Percentage	65%	20%	8%	7%

Actions Taken by TEAMS II Development Bureau

TEAMS II Development Bureau regularly sends out status reports that list all pending RMIS work items for each bureau. Delinquent work items are regularly tracked by TEAMS II Development Bureau staff to ensure that these are not due to system errors and also to facilitate the identification of divisions that may need assistance. TEAMS II Development Bureau is also developing status reports that will be available for all TEAMS II Coordinators Department-wide to generate themselves.

Additionally, TEAMS II Development Bureau is concerned that 30 days to complete an AI may be an insufficient period of time. As such, TEAMS II Development Bureau will be discussing with the Federal Monitor and the Department of Justice the possibility of increasing the time period from 30 to 60 days.

Objective D - Determine the extent to which thresholds and peer group settings have been modified since the previous audit.

Background

Consent Decree subparagraph 47(d) requires the establishment of guidelines for numbers and types of incidents requiring a TEAMS II review by supervisors and managers, and the frequency of these reviews.

Testing Results

The Commanding Officer of TEAMS II Development Bureau advised that there is a special project in progress whereby all of the 15 AI thresholds within RMIS are being analyzed to determine if any modifications are needed. The Department expects to issue a report with recommendations in late 2008 to present to the Department of Justice and the Federal Monitor. Hence, the OIG will postpone any review of this area until the aforementioned report is issued.

Objective E - Determine if CMS and UOFS disputed data correction requests were processed timely and accurately.

Background

Consent Decree subparagraph 47(j) requires that procedures be established for correcting data errors discovered by officers in their review of the TEAMS II data. Per the Department Manual, after receiving a request to correct inaccurate or incomplete information, the commanding officer of the entity responsible for entering the information into TEAMS II shall: 1) Investigate the disputed information; 2) Ensure that a resolution is obtained within 30 days of the request; 3) Correct the disputed information, if appropriate; and, 4) Notify the employee's commanding officer of the resolution in an Interdepartmental Correspondence, Form 15.2.

The OIG decided to focus its testing on CMS and UOFS, as they are probably the two most important source systems that feed into RMIS.

CMS Testing Results

As previously noted, all 16 CMS disputed data correction requests (involving 15 complaints and 12 employees) made from November 1, 2007 through June 30, 2008, were audited.

All 16 CMS disputed data correction requests were properly approved. For the 13 requests which were applicable to be processed, the corrections made (12), or not made (1), were valid and accurately reflected on the officers' TEAMS II records. Six of the 13 requests were processed within 30 days, as required; and another six requests were processed from five to 26 days late, so not unreasonably late. Only one was processed unreasonably late (130 days late), but it related to a complaint originating in 1998 (CF No. 98-1921), so it would not affect current RMIS threshold activations that generate AIs.

UOFS Testing Results

As previously noted, all nine UOFS disputed data correction requests (involving eight employees) made from November 1, 2007 through June 30, 2008, were audited. The disputed data related to six "old" use of force incidents that occurred from 1984 through 1994, for which the correcting entries needed to be made by TEAMS II Development Bureau.

All nine UOFS disputed data correction requests were properly approved, and the corrections made were valid and accurately reflected on the officers' TEAMS II records. However, none of the nine corrections were made in a timely manner, with the 15.2 from Use of Force Review Division (UOFRD) not being sent to the affected employee's current commanding officer within 30 days of the request, as required. For two of the requests related to the same use of force incident, the related 15.2s were sent to the two employees' current commanding officers 81 days late. For the other seven requests, as of the audit date, the related pending 15.2s were 88 to 234 days past due. However, after audit disclosure, UOFRD immediately prepared and sent these 15.2s to the commanding officers.

Note: The total UOFS data correction request's processing time includes the time spent in: (1) UOFRD researching the request and notifying TEAMS II Development Bureau of the needed correction, (2) TEAMS II Development Bureau making the correction and notifying UOFRD when completed, and (3) UOFRD verifying that the correction was accurately made by TEAMS II Development Bureau and notifying the affected employee's commanding officer of the correction made.

Actions Taken by TEAMS II Development Bureau

TEAMS II Development Bureau is redesigning the UOFS to include an administrative screen that will allow UOFRD staff to correct erroneous data for both categorical and non-categorical cases, including "old" cases prior to January 2006. Deployment is expected in the first calendar quarter of 2009. This will significantly decrease the amount of time to correct data in the UOFS.

Objective F - Determine if Organizational Performance Assessments (OPAs) were adequate, and included comparison to other organizations with similar responsibilities.

Background

Consent Decree subparagraph 47(k) and Special Order No. 7, 2008, dated February 14, 2008, require a regular review by appropriate managers of all relevant TEAMS II information to evaluate the performance of Department entities in order to identify any patterns or series of incidents that may indicate at-risk behavior. The assessment will include an independent review, conclusions, and recommendations to improve performance and accountability and to facilitate decision making.

In March 2008, for the first OPA ever performed, Risk Management Group (RMG) assembled and analyzed TEAMS II information for all 19 Area Narcotics Enforcement Detail units (NEDs) covering the period from January 2007 through March 2008. As a result of this RMG analysis, Central Area NED was selected for a more detailed review because of its high number of AIs, and the related presentation to the Risk Management Executive Committee was made on May 22, 2008.

Some of the highlights of the review of Central Area NED are as follows:

- Central Area NED received over twice as many AIs as any other Area NED.
- Compared to the other Area NEDs, Central Area NED ranked high in the number of uses of force and complaints and low in the number of Stops.
- Unlike other Area NEDs, Central Area NED operates almost exclusively in the task force mode. This contributed to the low number of Stops, as Field Data Reports were not required to be completed for task force Stops. However, the Commanding Officer of Central Area has revised procedures, whereby task force Stops are now being recorded.
- When use of force incidents occurred in the Central Area NED, supervisors were frequently among the other officers using force on the suspects. These supervisors have been counseled to supervise the officers when they use force on the suspects, and generally try to avoid getting themselves involved.

Testing Results

The OPA was thorough and thoughtful, and conducted in compliance with Consent Decree subparagraph 47(k) and Special Order No. 7, 2008, with valid comparisons and recommendations made for Central Area NED.

PRIOR RECOMMENDATIONS

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.

Status: Open - TEAMS II Development Bureau and Risk Management Group are currently reviewing the peer group settings and performance threshold formulas. This assessment will be presented to the Federal Monitor and the Department of Justice in late 2008 for approval, and AI dispositions will also be discussed with them.

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").

Status: Closed - TEAMS II Development Bureau will not provide additional guidelines because guidelines are already in place for the various dispositions. However, TEAMS II Development Bureau is considering automatically generating a separate follow-up action item to the supervisor for any disposition other than "No Action" and "No Action – Note for Annual Review Only." For example, if a supervisor selects "Training" as a disposition for an AI, the supervisor will receive a follow-up action item, requiring the supervisor to note when the training was completed and what type of training was provided.

- 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.

Status: Closed - The Department will rely on the TEAMS II audits performed by the OIG and will not conduct its own audits.

- 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.

Status: Implemented - Effective May 15, 2008, with each AI issued, the first-level reviewer must open all mandated reports before the AI can be moved up to the next level of review. Also, effective May 15, 2008, before the AI can be moved up to the next level of review, the first-level reviewer must indicate that he/she reviewed all pending complaints and the date that he/she met with the affected employee to discuss the AI. TEAMS II Development Bureau personnel demonstrated during this Audit that these controls are functioning as intended.

CONCLUSION

The OIG found that the AI narratives supported that good-faith comprehensive reasonable reviews were performed, with the dispositions (including “No Action”) adequately justified. Also, there was evidence that the prescribed “corrective” follow-up actions were taken. Although some AIs were not timely completed, there was improvement since the prior audit. The one OPA completed was well done, and included the necessary analyses and comparisons.

We wish to thank the Commanding Officer and personnel of TEAMS II Development Bureau for their cooperation and prompt feedback provided to the OIG during this Audit. Also, we wish to thank the personnel of Internal Affairs Group, UOFRD and RMG who fully cooperated in our review of disputed data correction requests and the OPA.