Minneapolis Police Department

Field Training Officer (FTO)

Program Special Project

City of Minneapolis

Internal Audit Department

June 28, 2021

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Executive Summary

In June 2020, the City of Minneapolis (the "City") Internal Audit Department ("Audit") amended its rolling audit plan to include projects related to the Minneapolis Police Department (MPD). As part of the process, Audit met with members of the Audit Committee, Civil Rights, Police Department, and the community, to identify potential risks. Audit then incorporated the conversations into our risk assessment process and identified potential projects that could add value to the Police Department and to the City.

The Field Training Officer (FTO) Program ranked high on the list of potential projects as it represents the first opportunity for new recruits in the field and was identified as a critical aspect of training. Additionally, recent events heightened scrutiny of the FTO Program, leading to increased interest in successful operations.

Project Scope and Approach

The objective of this project was to review the FTO Program to evaluate current practices and identify potential process improvements. Specifically, the review included:

- Evaluating the criteria for selecting Field Training Officers (FTOs)
- Evaluating the process for ongoing monitoring of FTOs
- Evaluating the process FTOs use to appraise recruits/Officers in Training (OITs)

Evaluations used criteria from the objectives outlined in the Field Training Officer Handbook. Procedures for evaluating the program included reviewing unit manuals/policy documents, training materials, and data related to the program. Audit also conducted random sampling from available FTO Program lists, and conducted interviews with FTOs, Field Training Sergeants (FTS), and OITs who have recently gone through the program. The selection included officers in a variety of positions across the City and a range of experiences with the department and program.

In addition, current FTO have expressed great interest in participating in the interviews; therefore, Audit created a survey and sent it to all the FTOs based on a list management provided. Audit used feedback received from phone/Microsoft Teams interviews and responses to the survey to document observations and recommendations for the project.

Results

As a result of this project, Audit noted four (4) areas for improvement:

1. FTO Program staffing and structure (HIGH)
2. Communication and information flow within the FTO Program (HIGH)
3. FTO selection and oversight process (MEDIUM)
4. Enhancements to the Officers in Training (OITs)' evaluation process (MEDIUM)

Table 1 below contains the overall evaluation of the severity of the risk and the potential impact on operations. There are many areas of risk to consider including financial, operational, compliance, and reputation when determining the relative risk rating. Issues are rated as High, Moderate, or Low.

Table 1

Field Training Officer (FTO) Program Special Project Observations and Issue Ratings

High	Moderate	Low
1. FTO Program staffing and structure		
2. Communication and information flow within the FTO Program	3. FTO selection and oversight process	
	4. Enhancements to the officers in training (OITs)' evaluation process	

High Risk: Some key controls do not exist or are not properly implemented and control environment is impaired; high risk improvement opportunities require immediate corrective action.
Moderate Risk: Adequate control environment in most areas; moderate risk improvement opportunities identified which require corrective action.
Low Risk: Satisfactory overall control environment; small number of lower risk improvement opportunities identified which do not require a management action plan.

The details of these obervations are included within the *Obervations and Management Action Plan* section of this report, beginning on page 7.

Conclusion

Audit noted a number of areas for improvement in the FTO Program. These include opportunities to improve the overall program structure, communication within the program, FTOs' selection and oversight process and FTOs' evaluation process to help improve all participants' experiences, ensure consistency, and help the program meet its goals and objectives.

We believe that the evidence obtained provides a reasonable basis for our observations and recommendations based on the project objectives.

Audit would like to thank the Minneapolis Police Department (MPD) for their cooperation, time, and effort during this engagement.

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Background

Department and Program Overview

The Minneapolis Police Department (MPD) operates a Field Training Officer (FTO) Program out of the Training Unit. MPD's training program is modeled after the San Jose program, a model used by many other Police departments across the United States to train officers. Field training is an essential part of the training and onboarding process new officers go through, occurring after successful completion at the academy. The program is generally about four to five months in length, with Officers in Training (OITs) moving around the City in phases.

Field training is designed to supplement classroom instruction, with OITs learning the skills and knowledge necessary to be familiar with the policies and procedures practices of MPD. The stated *"goal of the Minneapolis FTO program is to select and retain experienced officers of the highest caliber to serve as Field Training Officers and Field Training Sergeants. The goal also includes phasing Officers in Training into the police department through the use of training and practical experience in the field, ultimately preparing the Officer in Training for solo assignment."*[1]

There are 7 objectives that the program has been designed and implemented to achieve:

1. To produce a highly trained and motivated police officer capable of meeting or exceeding standards of performance required;
2. To provide balanced, consistent, and standardized training to all newly hired police officers and to provide remedial training in areas where deficiencies are identified;
3. To build on the foundation of knowledge given through academy instruction, thereby creating an environment in which the OIT develops new skills and increases proficiency;
4. To improve the department screening process by providing on-the-job observation of each OIT's performance;
5. To establish an evaluation system that is job relevant and fair, utilizing a standardized and systematic approach to the documented measurement of the OIT's performance;
6. To ultimately increase the overall efficiency and effectiveness of the department by enhancing the climate of professionalism and competency demanded by the ethical standards of law enforcement; and
7. To utilize only skilled professional officers as FTOs throughout the training period.

Program Structure and Operations

The FTO Program is decentralized; there is an assigned lieutenant and sergeant in the Training Unit who oversee the program. The FTOs work across the City in their assigned precincts, serving as training officers when needed, and performing normal duties when not training. Designated shift sergeants, known as Field Training Sergeants (FTS') at the precincts also carry out FTO Program duties when necessary.

The MPD onboards officers as part of recruit classes, starting at the academy and then moving with their class to field training. There are typically several classes a year, each containing several dozen new officers. FTO

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[1] Minneapolis Police Field Training Officer Handbook

Program management assign OITs to a precinct and shift, and the precinct management will designate an FTO for the OIT. After that, the two work as partners, with the OIT steadily taking on more responsibility.

There is an initial several week-long orientation or transition phase when OITs first start the program, where they move around the department to about four different areas, including the precinct desk, investigations, and the Minneapolis Emergency Communications Center. They are not evaluated at that time, but the purpose is for them to gain a broader understanding of the department.

There are currently 4 evaluated phases, with the OIT moving on a periodic basis to a new precinct or new FTO. The exact length may vary and change in the future, but the process is generally the same. Each day, for about 52 shifts, the FTO is completing a daily evaluation form, known as the Recruit Officer Performance Evaluation, or ROPE form. This is a record of an OIT's daily performance, as well as training needs, with a few dozen areas a recruit is evaluated on from a score of 1 to 7, with 4 being considered acceptable. Scores of 1 are considered unacceptable, and 7 superior; the handbook FTOs use outlines in greater detail the meaning behind each score and grading standards.

The FTO can also provide additional comments and make recommendations to help and correct the OIT's performance. At the end of each shift, or when the ROPE form is submitted, the precinct FTS will review and sign-off on the document. FTS' and program management use these forms to help gauge how a recruit is progressing through training and escalate concerns or provide training as needed.

Communication between the OIT and the FTO is vital to the process and program. The goal is for the OIT to show continual performance improvement resulting from the hands-on training and debriefings using the MPD's Critical Decision-Making Model.

At the end of field training, and to successfully complete the program, there is a 10-day evaluation period, where the OIT is expected to work as a solo officer, handling calls and carrying out normal officer duties. The FTO is present with the OIT, however, is instructed not to intervene or assist the OIT; instead the FTO watches and evaluates the OIT. The OIT has to score at least a 4 in all categories for all 10 days to pass; there are circumstances where the OIT may receive an extension and retake the 10-day evaluation, as determined by management, in order to correct or receive remedial training.

Field Training Officer (FTO) Selection
On an as-needed basis, the Training Unit sends out formal job announcements for the FTO job, soliciting applicants across the department. These also may contain some general job requirements and criteria for the job, and the type of officer the program is looking for. Generally, they are looking for experienced officers who are willing to train and have a history of performing well as an officer. In addition to the formal Training Unit application process, sergeants at the precincts may ask officers to field train, either as a temporary replacement or for longer durations as needed.

The Training Unit offers specialized FTO training courses for the FTOs and prospective FTOs, ranging in length from one day to five days, where the officers are taught the specifics of the program and how to properly train and work with OITs.

Oversight and Monitoring
Oversight and monitoring responsibilities fall at the precinct level. For shifts, there are sergeants who serve as FTS, and they are the ones primarily responsible for FTOs' supervision while they are training, and are in a position to monitor both FTO and OIT performance while also carrying out their normal supervisory duties.

That includes reviewing and signing off on the ROPE forms the FTOs submit at the end of each shift and communicating with and escalating concerns to FTO Program management as necessary.

Within the Training Unit and program management, there is a program sergeant and lieutenant who oversee the program and ensures that recruits are provided with the training and support required to become competent officers. They also oversee the FTOs. Program management is responsible for assigning OITs to FTOs, managing their activities and progress, and signing off on daily ROPE forms and final evaluations.

Observations and Management's Action Plans

As a result of this engagement, Audit identified four areas of improvement in the FTO Program. Observations, including risks, causes, and criteria, and recommendations, and management responses, are detailed below.

Observation #1
FTO Program staffing and structure (HIGH)

Observation

The FTO Program staffing and overall structure should be enhanced to ensure stability and the ability to meet the needs of the Minneapolis Police Department (MPD). The FTO Program plays a vital role in officers' training. Upon graduation from the police academy, all officers in training (OITs) go through the program where they receive hands-on training to serve as Minneapolis police officers. However, the MPD went through recent changes in staffing and resources, which impacted the program. Specifically, Internal Audit ("Audit") noted the following:

> **FTO staffing levels and health and wellness**
> The MPD has recently seen increased turnover, which impacted staffing levels at the Training Unit and in the FTO Program. Despite a recent recruiting effort, the high turnorver rate impacted the FTO-to-OIT ratio, which resulted in some FTOs spending more time training OITs or having to fill in more often for unavailable FTOs.
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> FTOs are responsible for ensuring their and the OITs' safety, and making sure that policies and procedures are followed and the OITs are properly trained. However, training standards and opportunities have changed, resulting in some officers serving as FTOs without having received formal training. While supervisors may look for signs of officer burnout or an officer reaching their training limit (i.e., number of OITs one can train during a certain period of time), there is no requirement that officers take breaks between trainings, or on the number of consecutive months they may train.
>
> Precinct sergeants are responsible for assigning OITs to FTOs, monitoring and supervising FTOs and OITs, and reviewing evaluation (ROPE) forms, in addition to their regular responsibilities. The increased turnover within the department has resulted in instances where there would be one sergeant for a shift, with the responsibility to provide adequate oversight and monitoring for FTOs and OITs while conducting their regular tasks. This also applies to the field training program sergeants who are responsible for providing final signoffs on ROPE forms.
>
> **Program structure**

The FTO Program is decentralized, placing the main responsibility for oversight and monitoring on the precinct supervisors. This does not give management sufficient insight into how the program is functioning, as they rely on sergeants and officers at the precincts to carry out program duties. In addition, the decentralization makes experiences with the program different from one precinct to another.

In recent years, various aspects of the FTO Program, such as the number and duration of training phases, requirements to become an FTO, and the content of the training, have changed, and management is making additional changes for the next OIT class. FTOs and OITs described an inconsistency in experience depending on when they participated in the program.

Adequate staffing and training conducted on a prescribed basis and covering topics deemed necessary, are essential to the success of the FTO Program as they will help meet standards and expectations of the program.

The FTO Program is decentralized, with training and evaluations occuring across the precincts. In addition, recent increase in turnover at the MPD impacted staffing levels and the number of FTOs available to train OITs.

Inadequate resources can lead to inadequate training of OITs, which can impact the ability of the FTO Program to meet its objectives and accomplish its mission. This can also increase the risk of non-compliance and liability to the City and increased turnover due to officers' burnout.

An insufficient number of FTOs increases the risk that officers' health and wellness are impacted, which in turn can result in increased turnover due to officers' burnout.

Recommendation

Audit recommends that management conduct a thorough review of the Training Unit and FTO Program to determine optimal program and training structure, while considering the following:

- The optimal number of FTOs needed to meet the department's goals.
- Training of FTOs, officers in training (OITs) and FTO management, including durations, topics covered, and the resources needed to sufficiently provide for adequate training.
- The optimal structure of the field training program phases, including topics such as the orientation phase and optimal length of field training time new officers should receive.
- Standard expectations of FTOs and OITs.
- Analysis of technology improvements that could be implemented over time to improve data analysis and reporting.

Management Action Plan

The Department has selected a new FTO coordinator who will collaborate with management to carry-out the following:

- Research alternate Field Training Program structures, duration and topics and benchmark similarly situated departments to identify promising practices.

- Develop an updated manual for Field Training officers clearly setting expectations for the quality and consistency of training, documentation requirements and the FTO performance evaluation process.
- Establish a list of professional development topics and potential trainers for areas such as de-escalation, emotional intelligence, resiliency, adult learning practices and bias; request budget approval for quarterly professional development sessions.
- Mirror training expectations and outline Field Training practices in a written guide for new officers.
- Evaluate and recommend for budget approval a software solution to improve record keeping, analysis and reporting.
- Invest in the recruitment of Field Training Officers with a visible acknowledgement of the critical role played by FTOs by developing an FTO patch or insignia pin to be worn on the uniform by fully qualified Field Training Officers in good standing.
- Invest in the recruitment and retention of Field Training Officers with incentive pay for fully trained FTOs in good standing; this incentive pay will be separate from Field Training overtime paid only during training shifts as a recognition of the overall value that Field Traininig officers bring to the department.
- Develop an updated manual for the FTO coordinator position to outline the role of the coordinator in supporting high quality, consistent field training for every recruit officer and the systems used to monitor, track and support the performance of the officer in training and the trainer using an updated ROPE form, BWC video and regular check-in meetings.
- Develop a written guide for precinct supervisors outlining the FTO coordinator and training chain of command's responsibility for the supervision and management of the Field Training process and the expectations set for precinct work to support Field Training Officers and officers in training.

Target remediation date: 1/1/22 for those items that do not need budget approval
Responsible party: Commander Darcy Horn

Observation #2
Communication and information flow within the FTO Program (HIGH)

Observation

Communication and information flow within the FTO Program needs to be enhanced to ensure that FTOs have regular touchpoints with the Training Unit management, and feel like management takes their input on the Recruit Officer Performance Evaluation (ROPE) forms into account in the final decision making process.

With a decentralized program and officers being trained across all 5 precincts, information flows from the OITs, FTOs and field training supervisors (FTS) at each precinct to the FTO Program and Training Unit. FTOs mostly communicate with their precinct sergeants, who then escalate concerns or issues to program management as deemed necessary. In addition, program management gains insight into OITs' performance at the different precincts by reviewing the ROPE forms FTOs completed.

Audit noted two areas of the communication and information flow within the program that need enhancement to ensure consistency:

Communication related to OITs' performance

FTOs are the most involved in OITs ' training and are in the best position to know how OITs are doing, and whether they are meeting program standards and objectives. During their time with OITs, FTOs provide feedback and support to their assigned OIT and complete their evaluation (ROPE) forms.

OITs rotate around as part of a preset schedule or at program management discretion as allowed by the FTO Program policies and procedures; so while some may spend a significant amount of time with the same FTO, others may be exposed to various FTOs during their training period, and others may see extensions to their field training period.

However, FTOs feel like they do not always have insight into the reasoning for rotating OITs and how their ROPE forms were used in the decision-making process. In some instances, FTOs may note concerns on the ROPE forms about an OIT's performance and also express the concerns to their precinct and program supervisors, but feel like their input is not considered in the decision-making process. Some FTOs expressed frustration related to the lack of follow-up to their communication on the ROPE forms and to their precinct and program supervisors. There is a general sense that their work and input is not always considered, and that the process of rotating OITs or extending their training period is not consistent across the board.

Communication with FTO Program management

Regular touchpoints between Training Unit management, OITs and FTOs are not currently occuring. Although FTOs can reach out to the Training Unit, there is not a regular, standing opportunity to do so.

In addition, Audit observed that program participants may have different understanding of how the program is currently functioning. With the decentralized nature of the program, participants may be relying on old policies or prior knowledge in their particular duties, unaware of how the program as a whole is currently operating.

There is communication occuring, but it may be confied within individual precincts, creating an inconsistent experience for all.

In the Field Training Unit Supervisor (FTUS) manual, one of the duties noted was the coordination of monthly meetings between Training Unit management and the OIT and FTO. Communication is essential to any organization and well-functioning process, particularly one with a decentralized nature such as the FTO Program.

The FTO Program is decentralized, with the training and evaluation process occuring across the precincts and making regular and consistent communication harder to implement.
Disengagement among program participants, in particular if officers are not feeling adequately heard and valued, increases the risk of turnover among FTOs which in turn can negatively impact the program and the quality of training OITs receive.

A lack of regular and consistent communication increases the risk of inconsistent application of program policies and procedures. FTOs may be unaware of changes to the program, or be following practices management is unaware of, increasing the risk of non-compliance with department guidelines.

Recommendation

Audit recommends management prioritize and formalize communication channels between FTO management, FTS, FTOs, and OITs. Specifically, Audit recommends the following:

- When an OIT experiences changes to their training phase or has their training period extended, program management should communicate with the FTOs involved and provide clear, documented reasons for the changes and explain to the FTOs how their evaluations (ROPE forms) were considered in the decision-making process. In addition, management should clearly document their reasoning in deciding to rotate an OIT or extend their training period.
- FTO management should resume regular check-ins with FTOs (e.g., monthly as per the FTUS manual).
- FTO management should solicit regular feedback (e.g., quarterly) about the program from FTOs and follow-up as necessary on concerns or issues.

Management Action Plan

With a newly selected FTO coordinator moving into the role, the Training Divison team will collaborate to develop robust communication channels and update all documentation outlining expectations for officers in training and their Field Training Officers to include:

- A schedule for regular meetings between the FTO, the new officer and the FTO coordinator
- A schedule for quarterly training and development meetings for all Field Training Officers
- A list of professional development topics and potential trainers for areas such as de-escalation, emotional intelligence, resiliency, adult learners and implicit bias
- A clear set of expectations for completing ROPE forms
- A description of what and how communications about changes to the training plan will be shared
- A means for communicating priority feedback to the FTO coordinator (Smartsheet link), as distinct from either routine ROPE feedback or an emergency requiring immediate notifications and an explanation for what kind of information could fall into each category: routine, priority and emergency.

> Target remediation date: 10/1/2021
> Responsible party: Commander Darcy Horn

Observation #3
FTO selection and oversight process (MEDIUM)

Observation

There are opportunities to standardize and formalize the FTO selection process and experience, including enhancing and documenting the requirements. Audit noted the Following:

- The requirements to serve as an FTO are inconsistent. Some officers go through a formal application, selection and training process, while others might be asked at their precincts to field train. In the latter case, officers may not meet the requirements or may not have received training, thus bypassing the formal application process.
- There are no established criteria for the types of complaints and discipline decisions against an officer on their record that may disqualify them from being an FTO. In addition, there is not a clear process in place to ensure that the Training Unit is aware of and able to remove FTOs facing complaints or disciplinary measures.
- While FTOs evaluate OITs, there's currently no performance review process for FTOs. They are not regularly evaluated by the Training Unit or their precinct supervisors.
- There is no limit on the amount of time or number of officers in training (OITs) an FTO may train without required breaks from training.
- The Field Training Officer roster is not complete and up to date. While a Smartsheet roster is currently being created, the FTO list currently in Workforce Director (WFD) is outdated.

It is best practice to formalize and stantardize key processes to strengthen the control environment, improve efficiencies, and mitigate the risk of noncompliance. Documenting processes helps reduce operational ambiguity by providing consistency in operations and making monitoring easier.

The FTO Program is decentralized making it difficult to standardize processes across precincts.

Not always following the Training Unit process to becoming an FTO increases liability risk to the City as FTOs may be training OITs without having gone through adequate training themselves, which can lead them to not consistently follow established standards.

In addition, not establishing a formal FTO performance evaluation process increases the risk of non-compliance with training standards, which can lead to inadequately-trained OITs and potential liability to the City.

Furthermore, not setting a limit on the number of OITs an FTO may train and the number of training hours they can put in without taking a break increases the risk of officers burnout which in turn could lead to turnover, impact the quality of the training OITs receive and potentially cause liability to the City.

Finally, not having a complete and accurate FTO roster increases the risk of inadequate oversight and monitoring of FTOs, especially with the current decentralized nature of the program.

Recommendation

Audit recommends that management implement the following:

- Ensure that established requirements for officers to qualify to serve as FTOs are up to date and consistently followed across precincts.
- Ensure that only officers who have received adequate training serve as FTOs. If needed, develop and document in writing a process related to instances where a non-FTO may temporarily fill-in as a

replacement for an unavailable FTO. The documented process should be communicated to all precincts to ensure consistency across all precincts. In addition, adequately provide other training opportunities for FTOs and the program supervisor including national certification if possible.

- Document disciplinary actions or complaints that may disqualify an officer from being an FTO, include it in the program policy and procedure documents, and ensure that the process is enforced across all precincts.
- Establish a formal performance review process for FTOs and perform regular evaluations by comparing their performance to established standards for a successful FTO.
- Define and document the amount of time and number of OITs an FTO may train before they are required to take a break from training.
- Compile a complete roster of FTOs and FTS and establish a process to ensure the information is routinely updated to reflect departures from/additions to the program or the City. In addition, review the FTO list in Worforce Director (WFD) and bring it to a current status by adding new FTOs and removing permissions for officers no longer serving as FTOs.
- Document the Internal Affairs records review process for FTO applicants in the policy and procedures documents to ensure fairness and consistency.

Management Action Plan

The FTO coordinator and Training management will collaborate to update the standards for the FTO application, screening and selection process, taking into consideration the flexibility required by the department's current staffing situation. We may not be able to achieve ideal remediation until the overall strength of the department increases.   The final screening of Field Training Officers falls to the Chief of Police or his designee, currently the Deputy Chief of Professional Standards. Field Training Officers must be able to demonstrate the ability and willingness to teach recruits to competently perform the duties of a police officer to create safer and more peaceful neighborhoods; to mentor recruits to provide professional service to all in our communities; and to model MPD values and ethical conduct. MPD management reserves the right to revise the standards and selection process for Field Training Officers to meet departmenal needs and adjust to changing best practices and community expectations.

The management team and FTO coordinator will:

- Develop the outline for a standard job announcement to be used to announce the opportunity to submit a new Field Training Officer application. The template will include a description of the application process, standards, selection process, requirements for attendance at ongoing training and development sessions and periodic performance evaluation using new officer feedback and BWC video to ensure high quality, consistent training in line with department values.
- Identify application and selection components which may include a written statement of interest and/or an interview, supervisory recommendation, BWC video and report review, FTO coordinator check of published discipline available on the City website and non-public disciplinary history review by the Deputy Chief of Professional Standards.
- Require precinct commanders to approve the final list of Field Training Officers in their precinct every year prior to the first class of new officers beginning the Field Training Program.
- Develop a process for precincts to alert the FTO coordinator when an officer who has not been formally selected into the FTO program has been tapped to fill in during a training shift.
- Work with precinct commands to identify officers who will act as a reserve when there is an unplanned or emergent need for someone to work with a new officer during a training shift.

- Create a performance review process for Field Training Officers.
- Update and maintain the FTO roster.
- Identify strategies to limit the need for one FTO to serve in consecutive training rotations and to reduce overall FTO burnout.

> <u>Target remediation date</u>: 1/1/22
> <u>Responsible party</u>: Commander Darcy Horn

Observation #4
Enhancements to the officers in training (OITs)' evaluation process (MEDIUM)

Observation

The Recruit Officer Performance Evaluation (ROPE) form could be enhanced to ensure a fair and consistent process and alignment with current department policies and objectives. Through discussions and a review of the ROPE form template, Audit noted that it needs to be reviewed and updated to reflect recent changes, including changes in priorities, within the Minneapolis Police Department (MPD). The ROPE form is the main evaluation form FTOs use to monitor OITs. The form covers various training objectives and situations. FTOs complete the form at the end of each training shift, and OITs and FTS sign and review afterwards.

FTOs grade OITs on a scale of 1 to 7 for each category on the form. 4 is considered as "acceptable" performance, while 1 is considered "not acceptable" and 7 "superior". There is detailed guidance on grading criteria and what each score entails in the FTO Manual; however, different FTOs may have slightly different grading standards. On the ROPE form, grades between 4 and 6 do not require the FTO to provide a comment or reasoning for the score, but scores outside of that range require that the FTO provides comments.

As part of their training, OITs go through several different phases, including a non-evaluated several week-long orientation period where they are assigned to various parts of the department. Program participants expressed a desire to see OITs spending the most time as possible on the field, training with FTOs. They feel like moving non-field related training activities to the time OITs spend at the academy would lead to a better experience for both OITs and FTOs. In recent discussions, FTO management noted that they are exploring changes to the program, including changes in the orientation phase to increase the amount of field training OITs received.

FTOs' evaluation of OITs' performance is critical, and should be consistent and fair for all officers, as outlined in policy and procedure documents. Expectations should be adequately communicated to all program participants and communication with the Training Unit should ensure that OITs are progressing as expected, or identify and provide additional training, resources, or remedies. In addition, policy and procedure documents related to the evaluation process should be reviewed and updated on a regular basis, and aligned with program and department goals. Changes to the program and its operations should follow a documented change management process to allow for analysis and comparisons.

The FTO Program is decentralized. Oversight and monitoring generally occurs at the precinct-level, with some limited oversight by the Training Unit. Without regular and frequent communication across all program partipants, along with training, program participants may be following different procedures or have different standards that are used in evaluations. In addition, there have been recent changes to department priorities and policies and procedures.

Unfair evaluations, or a lack of set standards that fairly applied to all, with deviances documented, can lead to ineffective or inadequate training, increasing the risk of liability to the department. In addition, the current lack of requirement for comments for all scores creates the incentive for FTOs to grade towards the median score, regardless of where the OIT may have actually performed, particularly if time or resources are short.

Recommendation

Internal Audit recommends that management review and update the ROPE form to reflect current program and department objectives. Specifically, management should:

- Review categories and areas to ensure they are all relevant and current.
- Change the score criteria at which comments are required, either forcing comments for any score or removing the comments requirement, to reduce the incentive for FTOs to give a median score.
- Ensure that resulting changes are clearly communicated to all program participants and covered in training opportunities for FTOs.
- Ensure that the program structure considers the training and evaluation of OITs. The impacts of program changes should be documented and regularly reviewed to determine whether they were successful or whether additional changes need to be made.

Management Action Plan

The FTO coordinator and the management team will collaborate to identify opportunities to update the evauation form to reflect current department values and priorities notably procedural justice and community relationship building by taking the following steps:

- Evaluate alternate performance documentation tools.
- Identify benchmarks in category, comment requirements and score range using similarly situated departments.
- Examine MPD materials describing Chief Arradondo's vision for the MPD, the department values and our procedural justice work to identify new categories for inclusion.
- Obtain internal and external stakeholder feedback about what categories, new or existing, should be added, updated or removed to meet departmental needs and community expectations.
- Revise the ROPE form to include newly identified categories and remove those which are outdated.
- Incorporate updated evaluation expectations into the written guides prepared for FTOs and new officers.
- Provide updated evaluation training to Field Training Officers.
- Obtain feedback from Field Training Officers and officers in training during monthly check-in meetings and the quarterly FTO professional development meetings.
- Make adjustments in line with feedback.
- Evaluate software options for improving evaluation record keeping and make a recommendation for the budget process.
  <u>Target remediation date</u>: 6/1/22
  <u>Responsible party</u>: Commander Darcy Horn