

## INTRADPARTMENTAL CORRESPONDENCE

February 24, 2017  
14.2

**TO:** The Honorable Board of Police Commissioners

**FROM:** Chief of Police

**SUBJECT:** SECURITY SERVICES DIVISION AUDIT (AD No. 15-051)

### RECOMMENDED ACTIONS

1. It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Reasonable Accommodation Audit.
2. It is recommended that the Board of Police Commissioners REVIEW and APPROVE the attached Executive Summary thereto.

### DISCUSSION

Audit Division conducted the Security Services Division Audit to evaluate compliance with Department policies and procedures.

If additional information regarding this audit is required, please contact Arif Alikhan, Office of Constitutional Policing and Policy, at (213) 486-8730.

Respectfully,



CHARLIE BECK  
Chief of Police

Attachment

LOS ANGELES  
POLICE DEPARTMENT

*SECURITY SERVICES DIVISION AUDIT*  
*(AD No. 15-051)*



Conducted by  
**Audit Division**

**CHARLIE BECK**  
Chief of Police

*February 2017*

# SECURITY SERVICES DIVISION AUDIT

Conducted by

Audit Division

Second Quarter, Fiscal Year 2015/16

## PURPOSE

In accordance with the Los Angeles Police Department (Department) Annual Audit Plan for fiscal year 2015/16, Audit Division (AD) conducted the Security Services Division (SECSO) audit to evaluate adherence with Department policies and procedures, as well as regulatory requirements regarding the transition of Municipal Police Officers (sworn) and Security Officers (non-sworn) into the Department.

Audit Division conducted this audit under the guidance of Generally Accepted Government Auditing Standards,<sup>1</sup> specifically pertaining to performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. Audit Division has determined that the evidence obtained provides a reasonable basis for the findings and conclusions based on our audit objectives.

## BACKGROUND

On January 1, 2013, the Office of Public Safety (OPS), General Services Division (GSD) transferred into the Department's newly formed SECSO<sup>2</sup>, under the Office of Special Operations. "SECSO is responsible for the safety and security of City buildings, facilities, yards and warehouses, the Los Angeles Civic Center, the Los Angeles Zoo, Public Works Bureau of Sanitation Water Treatment Facilities, City Libraries, City Parks and all non-proprietary City facilities, including their employees and visitors."<sup>3</sup>

SECSO consists of three major components: the police officer component; the security officer component; and, the contract security officer component. The police officer component is responsible for all law enforcement-related activities surrounding City facilities. The second component is comprised of unarmed security officers who are City employees. These unarmed civilian security officers staff fixed post positions at various City facilities and rely on the police component to respond to any issues deemed law enforcement-related. The third component, contract security, is comprised of private security guards. The responsibility for administering contract security for City facilities rests with SECSO.

## PRIOR AUDITS/PRIOR RECOMMENDATIONS

There have been no prior audits of SECSO conducted by AD.

## SCOPE AND METHODOLOGY

The audit populations, as well as the methodology, are noted in detail for each applicable objective.

---

<sup>1</sup>U.S. Government Accountability Office, Generally Accepted Government Auditing Standards, December 2011 Revision.

<sup>2</sup>Administrative Order No. 10, July 1, 2012, Security Services Division – Established

<sup>3</sup>"Yards" mentioned in this quote refers to maintenance yards and salvage yards.

**SUMMARY OF FINDINGS**

There was a total of seven objectives/sub-objectives, which included a review of training, Memorandums of Understanding, and field observations of fixed posts. The SECSO did well with each of the objectives examined, and there were no areas of concern.

**Table – Summary of Audit Objectives**

Objective No.	Objectives	Meeting Standard/Reviewed	Percentage Met Standard
<b>1</b>	<b>Training and Certification Requirements</b>		
1(a)	Municipal Police Officer, Completion of Transition Training	Information Only	
1(b)	Security Officer, Completion of Penal Code 832 Course(s)	3/3	100%
1(c)	Sworn, Completion of Department Required Training	101/101	100%
<b>2</b>	<b>Memorandum of Agreement</b>	4/4	100%
<b>3</b>	<b>Field Observations of Selected Memorandum of Agreement Locations</b>		
3(a)	Fixed Posts	10/10	100%
3(b)	Radio Communications	10/10	100%
3(c)	Transfer of Communications Information Representatives	5/5	100%

**DETAILED FINDINGS**

**Objective No. 1 – Training and Certification Requirements**

This objective contains three sub-objectives assessing the completion of required training and certifications.

**Objective No. 1(a) – Municipal Police Officer, Completion of Transition Training – Information Only**

**Criteria**

**Municipal Police Officer**

A Municipal Police Officer (MPO) is a sworn peace officer, authorized to carry a firearm, enforce state and local laws and engage in law enforcement activities.<sup>4</sup> The transition from an MPO to a Department sworn officer was optional and consisted of classroom and field certification training.

Municipal Police Officers who completed the Department’s Transition and Field Certification Training, transitioned into the Department’s sworn officer classification. If MPOs did not complete the training and certification requirements, they remained in the MPO classification.

<sup>4</sup>The City of Los Angeles, Civil Service Commission, Class Specification, December 13, 2012, Municipal Police Officer, 3183.

## **Audit Procedures**

Auditors obtained the current Municipal Transition Roster dated, October 19, 2015 documenting MPOs that transitioned into to Department's sworn officer classification. Auditors examined the Training Evaluation and Management System (TEAMS) II reports to verify the required field certification training was completed.

## **Conclusion**

Forty-seven MPOs met the training and field certification requirements and transitioned into the Department sworn officer classification, 32 remained MPOs; and four separated from City employment.

This objective was for informational purposes only, as MPOs were not mandated to transition into the Department's sworn officer classification.

## **Objective No. 1(b) – Security Officer, Completion of Penal Code 832 Course(s)**

### **Criteria**

*California Penal Code*, Title 3, "Additional Provisions Regarding Criminal Procedure," Chap. 4.5, "Peace Officers," Section 830.7, states:

The following persons are not peace officers but may exercise the powers of arrest of a peace officer as specified in Section 836 during the course and within the scope of their employment, if they successfully complete a course in the exercise of those powers pursuant to Section 832.

(i) Persons regularly employed by any department of the City of Los Angeles who are designated as security officers and authorized by local ordinance to enforce laws related to the preservation of peace in or about the properties owned, controlled, operated, or administered by any department of the City of Los Angeles and authorized by a memorandum of understanding with the Chief of Police of the City of Los Angeles permitting the exercise of that authority. Security officers authorized pursuant to this subdivision shall not be deemed peace officers for purposes of Sections 241 and 243.

*California Penal Code*, Title 3, "Additional Provisions Regarding Criminal Procedure," Chap. 4.5, "Peace Officers," Section 832, states:

(a) Every person described in this chapter as a peace officer shall satisfactorily complete an introductory training course prescribed by the Commission on Peace Officer Standards and Training."<sup>5</sup>

---

<sup>5</sup> "Penal Code Section 832" will be referred to as PC 832 for this audit.

(b) (1) Every peace officer described in this chapter, prior to the exercise of the powers of a peace officer, shall have satisfactorily completed the training course described in subdivision (a).

### **Audit Procedures**

Auditors obtained SECSO's personnel roster, dated November 24, 2015, and identified personnel assigned as armed security officers. Auditors reviewed the TEAMS II reports and related training documents to verify the completion of the required Penal Code Section (PC) 832 Powers of Arrest training, as well as the PC 832 Firearms course. Auditors identified 180 security officers, of which three were armed and assessed for this objective.

The security officers met the standard for this objective if they completed the PC 832 Powers of Arrest and Firearms Course.<sup>6</sup>

### **Finding**

Each (100%) of the three (armed) Security Officers met the standards for this objective.

### **OTHER RELATED MATTER**

Although unarmed security officers were not required to complete the PC 832 Powers of Arrest course, SECSO understands the importance of all their personnel having this essential training. Therefore, Security Services Division took proactive measures to ensure their unarmed security officers attend the PC 832 Powers of Arrest training as well.

Currently, one hundred sixty-six (87%) of the 180 Security Officers (armed and unarmed) have received the PC 832 Powers of Arrest training.

### **Objective No. 1(c) – Sworn, Completion of Department Required Training**

#### **Criteria**

*Police Training and Education Notice*, May 12, 2014, "Deadline to Comply with Post-Mandated Perishable Skills/Continuing Professional Training," states:

The deadline for LAPD Officers to comply with the current two-year cycle of Perishable Skills/Continuing Professional training mandated by the California Commission on Peace Officer Standards and Training (POST) (POST Administrative Manual, Regulation 1005) is December 31, 2014."

Mandated training covers the following topic areas:<sup>7</sup>

<sup>6</sup>There was no mandate for (unarmed) security officers to complete the PC 832 Powers of Arrest course and Firearms Course.

<sup>7</sup>Personnel and Training Bureau Notice, May 18, 2012, Perishable Skills/Continuing Professional Training Compliance.

**Perishable Skills training** – 14 hours minimum:

- Arrest and Control (minimum 4 hours);
- Driver Training (minimum 4 hours);
- Tactical Firearms (minimum 4 hours);
- Communications, either tactical or interpersonal (minimum 2 hours); and,

**Continuing Professional Training** – 10 hours minimum:

- 10 hours of additional POST-certified training.

**Audit Procedures**

Auditors obtained SECSO's personnel roster, dated November 24, 2015, and identified MPOs who had transitioned into the Department's sworn officer classification, as well as Department sworn personnel assigned to SECSO. Auditors reviewed the TEAMS II reports to verify the completion of the 24-hour POST-Mandated Perishable Skills/Continuing Professional training for the two-year training cycle (January 1, 2013 through December 31, 2014).

Auditors identified 101 sworn officers. The sworn officers assigned to SECSO met the standard if they completed 24 hours POST-Mandated Perishable Skills/Continuing Professional training during the two-year training cycle.

**Finding**

Each (100%) of the 101 sworn officers met the standard for this objective.

**Objective No. 2 – Memorandum of Agreement**

A Memorandum of Agreement (MOA) is intended to assist management, supervisory and line personnel in decisions related to law enforcement and security services at fixed posts, and to delineate duties and responsibilities to ensure service levels are met.

The agencies that have current MOAs with the Department are: The Department of Recreation and Parks, the Bureau of Sanitation, the Los Angeles Public Library, the Los Angeles Zoo, and General Services (Civic Center).<sup>8</sup>

**Criteria**

*Department Manual*, 3<sup>rd</sup> Quarter 2015, Vol. 3, "Management Rules and Procedures," Section 280.10, "Memorandum of Agreement – Defined," states:

A Memorandum of Agreement is a written agreement, signed by the Chief of Police, between the Department and an outside entity."

---

<sup>8</sup>The General Services (Civic Center) MOA was not available for review. It expired in December 31, 2015; however, it was extended for one year.

*Department Manual*, 3<sup>rd</sup> Quarter 2015, Vol. 3, “Management Rules and Procedures,” Section 280.20, “Staff and Command Officer’s Responsibility,” states:

All staff and command officers shall:

- Initiate, negotiate, re-negotiate, and write all outside agency agreements under their command;
- Forward copies of completed agreements through the chain of command to the Commanding Officer, Policies and Procedures Division, for review and coordination of Chief of Police approval and signature; and,
- Forward completed and signed agreements to Policies and Procedures Division.

### **Audit Procedures**

Auditors obtained copies related to four of the five current MOAs in effect (fiscal year 2015/16) from SECSO. The MOAs were reviewed for signatures and the date signed by an executive representative from the City Agency and the Department.

The MOA met the standard for this objective if it was current, signed, and dated by an executive representative from the City Agency and the Department.

### **Finding**

Each (100%) of the four MOAs met the standard for this objective.

### **Objective No. 3 – Field Observations of Selected Memorandum of Agreement Locations**

Audit Division selected MOA locations for site visits; as well as reviewed documentation at SECSO for compliance with the MOA and Department policies and procedures.

### **Objective No. 3(a) – Fixed Posts**

#### **Criteria**

- Security Services Division will designate personnel (contracted, Security Officers, and/or sworn) to provide service at fixed posts including City facility entrances;
- The fixed posts shall have current Post Orders and Daily Event Activities provided by the City facility; and,
- Watch Commanders and field supervisors shall complete the Post Inspections Checklist to document Post audit findings.<sup>9</sup>

---

<sup>9</sup>Area Order No.1, Post Inspection Checklist Form, February 2015.



## **Audit Procedures**

Auditors selected ten fixed posts serviced by security and/or sworn officers to review the Post Orders and Daily Event Activity sheets to determine if they were up to date and the appearance of officers was evaluated to include uniform maintenance, equipment, personal attire, and professionalism of interaction with the public. The ten fixed posts selected were as follows:

- Los Angeles Zoo;
- Hyperion Water Treatment Plant;
- Los Angeles-Glendale Water Treatment Plant;
- Central Library;
- City Hall;
- City Hall East;
- City Hall South;
- Valley Communications Center (Van Nuys);
- Marvin Braude Building; and,
- Van Nuys City Hall.

Auditors selected Deployment Period Nos. 5 through 7 (April 19, 2015 to July 11, 2015) to review Watch Commander's Daily Reports, Form No. 15.80.00, and Sergeant's Daily Reports, Form No. 15.48.00. The review was to determine if SECSO personnel were conducting inspections of fixed posts.

For compliance at the fixed posts, the security and sworn officers met the standard if they were in uniform, professional in nature, were physically at the Fixed Post site, and Post Orders and Daily Event Activity sheets were available for review.

## **Finding**

Each of the ten (100%) sites met the standard for this objective.

## **OTHER RELATED MATTERS**

Auditors identified the following areas of concern:

### **Los Angeles Zoo**

The Los Angeles Zoo and Botanical Gardens consists of 133 acres and approximately 1,100 animals. The Zoo receives more than 1.5 million visitors yearly.

At the Zoo's entrance there did not appear to be any preventive security measures (checking handbags and/or, metal screeners/detectors or wands). Auditors noted inoperable parking lot cameras and identified one security officer qualified for bicycle patrol in the parking lot.

At the back gate, which is used primarily for deliveries, auditors noted a vacant post and inoperable camera. When visitors/deliveries/guests arrive at the back gate, they ring the bell and

Security Officers open the gate electronically from their fixed post inside the park, which is located near the front of the Zoo. The Security Officers are not able to physically observe or confirm the person at the back gate prior to granting them access to the facility.

Auditors have identified this issue as a very high-security risk especially since instances of children leaving the sight of their guardians are a common occurrence at the Zoo. During the site visit, a missing child was reported on the radio. Within four minutes of the reported incident, the missing child was located. Security Officers work with the Zoo personnel to respond to missing child incidents urgently; however, there were as many as 12 missing child incidents noted by the Chief of Security on one particular high visitation day; each child was subsequently returned safely to their guardian.

Additionally, auditors identified that only five of the seven security posts in the Zoo were staffed. The Chief of Security stated that he meets with the Zoo stakeholders on a regular basis and has made them aware of the security shortcomings (cameras being inoperable, the back gate, etc.) and they are working toward resolving these issues. The Zoo's Board of Directors manages the affairs of the zoo, and therefore understood that any areas of concern must be addressed and resolved by the Board of Directors.

### **Objective No. 3(b) – Radio Communications**

Since the merger, the Department has sought continuous improvements for SECSO radio communications. Currently, the 800MHz trunked radio system was patched into LAPD Channel 190 to achieve interoperability between the two radio systems. The radio unit designation for SECSO is 36, combined with the service identification letters such as FP for fixed posts or RP for roving patrol.

### **Criteria**

*Security Services Division Area Order 2*, October 24, 2013, "Radio Communications Responsibilities," states:

1. Whenever possible, uniformed personnel shall set their handheld radio to Channel 190, while scanning the base frequency of their assigned area (i.e. an officer assigned to the Marvin Braude Building will keep the handheld radio assigned to Channel 190, while scanning Van Nuys Area frequency)."

### **Audit Procedures**

Auditors conducted unannounced checks at selected fixed posts during February 2016 to determine if radio communications were set to LAPD frequencies. The fixed posts met the standards if the security officers' radios were set to the required radio frequencies.

### **Finding**

Each (100%) of the ten fixed posts met the standard for this objective.

**Objective No. 3(c) – Transfer of Communications Information Representatives**

**Criteria**

*Security Services Division Area Order 2*, October 24, 2013, “Radio Communications Responsibilities,” states:

Plans are underway for a transition of radio communications responsibilities to Communications Division. It is expected that all CIRs will move to RACR Division, effective DP 2 (January 26, 2014).

3. All investigations and stops conducted by sworn personnel and requests for a police unit by civilian personnel will be broadcast on the base frequency for the Area of occurrence (i.e., pedestrian stops, traffic stops, warrant and DMV checks, etc.). Such radio traffic will be managed by Radio Telephone Operators (RTO) at Communications Division.

**Audit Procedures**

Auditors reviewed Real-Time Analysis and Critical Response Division (RACR) and SECSO's personnel rosters from Deployment Period No. 2 (January 26, 2014, through February 22, 2014) to determine if the Communication Information Representatives (CIRs) transferred to RACR. Five CIRs were identified from the personnel rosters. Security Services Division met the standard if the CIRs transferred to RACR.

**Finding**

Each (100%) of the five CIRs transferred to RACR, and met the standards for this objective.

**RECOMMENDATIONS**

None.

**ACTIONS TAKEN/MANAGEMENT'S RESPONSE**

1. The audit report was provided to the Assistant to the Director, Office of Special Operations, and the Commanding Officer, SECSO, who both expressed general agreement with the audit findings.
2. An Intradepartmental Correspondence, Form 15.02.00, was submitted by the Commanding Officer, Security Service Division in response to the audit findings. See Addendum.