

## INTRADEPARTMENTAL CORRESPONDENCE

April 6, 2017  
14.2

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

**FROM:** Chief of Police

**SUBJECT:** WORK PERMIT AUDIT (AD No. 15-059)

### RECOMMENDED ACTIONS

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

### DISCUSSION

Audit Division conducted the Work Permit Audit to evaluate compliance with Department policies and procedures.

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

Respectfully,



CHARLIE BECK  
Chief of Police

Attachment

# LOS ANGELES POLICE DEPARTMENT

## *WORK PERMIT AUDIT*

*(AD No. 15-059)*



Conducted by  
AUDIT DIVISION

CHARLIE BECK  
Chief of Police

*March 2017*

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**EXECUTIVE SUMMARY**  
**WORK PERMIT 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 conducted the Work Permit Audit. The purpose of the audit was to evaluate the investigation, approval, and record keeping processes for Permit for Secondary (outside) Employment (regular work permit)<sup>1</sup> and Motion Picture/Television Filming Work Permits (MPTFWP) applications of employees seeking secondary employment, and to determine compliance with Department policies and procedures as well as related City, State and federal regulations, if applicable.

**BACKGROUND**

Department procedures require all employees seeking secondary employment to submit a work permit application, Permit for Secondary Employment, Form 01.47.00, to the respective Area/division/group/bureau commanding officer through their immediate supervisor. The supervisor conducts an investigation by reviewing the application for completeness; ensuring the secondary employment does not conflict with any duty restrictions; documenting information discovered that may result in a denial of the application; and, ensuring the requesting employee included copies of permits and licenses required to perform the secondary employment.

For employment in the film industry, MPTFWP, Form 01.47.01, the required accompanying documents include driver license, current motorcycle registration, and proof of insurance if the employee is requesting to use a motorcycle.

**SUMMARY OF FINDINGS**

The audit was comprised of ten objectives/sub-objectives. Based on the test work performed, it is evident that the Area supervisors are reviewing the work permit applications and the Area commanding officers are reviewing and recommending approval of the applications, as evidenced by their signatures. However, improvement is needed with the completion of the MPTFWPs as only 22 (56%) of the 39 applications reviewed were complete (Objective No. 1(a)). Emergency Operations Division, is responsible for managing the MPTFWPs, and is currently in the process of making changes to the MPTFWP procedures and application process.

Furthermore, 22 percent of the work permit applications contained inconsistent information, when compared to the information in the Comprehensive Automated Permit System (CAPERS), indicating a lack of a certification process. (Objective No. 3). See table for audit findings.

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<sup>1</sup>The Permit for Secondary Employment is also referred to as regular work permit in this audit report.

### Summary of Audit Findings

Obj. No.	Audit Objectives	Findings
<b>1</b>	<b>Motion Picture/Television Filming Work Permit Application/Renewal Form was Properly Processed</b>	
1(a)	MPTFWP Application was Appropriately Completed	22/39 (56%) <sup>2</sup>
1(b)	Reviewing Supervisor and Area Commanding Officer Reviewed and Signed the MPTFWP Application	39/39 (100%)
1(c)	Employee Submitted All Required Documents with the MPTFWP Application	See Detailed Findings <sup>2</sup>
1(d)	Approval/Denial of the MPTFWP Application by Commanding Officer, Emergency Operations Division	39/39 (100%)
<b>2</b>	<b>Permit for Secondary Employment Application was Properly Processed</b>	
2(a)	Application was Appropriately Completed	77/87 (89%)
2(b)	Area Commanding Officer Reviewed and Signed the Application	86/86 (100%)
2(c)	All Required Documents Submitted with Work Permit Application	50/51 (98%)
2(d)	Approval/Denial of Application by Assistant Commanding Officer, Administrative Services Bureau	86/86 (100%)
<b>3</b>	<b>Work Permit Application was Recorded Accurately into the CAPERS</b>	98/125 (78%) <sup>3</sup>
<b>4</b>	<b>Work Permit Application Information was Recorded Accurately into TEAMS II</b>	125/125 (100%)

### RECOMMENDATIONS

- Emergency Operations Division is in the process of updating and revising the MPTFWP application and its processes. It is recommended that Emergency Operations Division discuss the changes with Policies and Procedures Division they intend to make in regard to the requirements of MPTFWP applications as they may affect current policies and procedures. See Objective No. 1(c).
- A signature block on the Permit for Secondary Employment indicates a review and approval by the Commanding Officer, Personnel Group. Due to the recent Department reorganization, Personnel Group has been deactivated. It is recommended that Policies and Procedures Division review and amend the Permit for Secondary Employment to reflect the correct approval process for regular work permits. See Objective No. 2.
- Department Manual Section 3/744.20, Application for Permission for Outside Employment, states, *"Any employee wishing to engage in outside employment shall submit to their commanding officer [a] signed Permit for Outside Employment, Form 01.47.00."* The term "outside employment" is used repeatedly in this section. However, Form 01.47.00 is titled, "Permit for Secondary Employment." It is recommended that Policies and Procedures

<sup>2</sup>See Detailed Findings. The EOD is changing the current MPTFWP application process, to eliminate the requirement for personal information to be documented on the application.

<sup>3</sup>See Detailed Findings. The EOD is working with Application Development and Support Division (ADSD) to modify CAPERS to allow more accurate data entry.

Division consult with Administrative Services Bureau to determine the appropriate terminology and to make the changes accordingly. See Objective No. 2.

4. It is recommended that Administrative Services Bureau and Policies and Procedures Division discuss the relevance of the Manual's requirement of four signed copies of the Permit for Secondary Employment and determine if it should be modified to reflect the current practice of only one signed copy being forwarded to Administrative Services Bureau. See Objective No. 2(a).
5. Currently, the Administrative Services Bureau website requires that "*All security-related work permit requests must be submitted with a copy of the firearm permit (if working in an armed capacity) and security guard registration.*" However, during the course of the audit, it was learned that Human Resources Bureau (HRB) Notice, April 16, 1998, allows for the (Department of Consumer Affairs) firearm permit and security guard registration applications to be submitted (attached) to the Department's work permit application.

It is recommended that Administrative Services Bureau revise their section in the Department's Local Area Network and update the HRB Notice to indicate that *applications* for firearm permits and security guard cards can also be submitted with the Department's work permit request (application). See Objective No. 2(c).

6. It is recommended that Application Development and Support Division modify CAPERS to include fields to capture the current/renewal signature dates. Additionally, Topanga and Olympic Areas should be added to the Division of Employment field. See Objective No. 3.

#### **ACTIONS TAKEN/MANAGEMENT'S RESPONSE**

1. The findings were validated with the Assistant Commanding Officer, Administrative Services Bureau, and Commanding Officer, Emergency Operations Division.
2. The audit report was provided to the Assistant Commanding Officer, Administrative Services Bureau, and the Commanding Officer, Emergency Operations Division, both whom expressed general agreement with the findings and recommendations.
3. Application Development and Support Division agreed with the applicable recommendations.
4. Policies and Procedures Division agreed with the applicable recommendations.

**WORK PERMIT 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 Work Permit Audit. The purpose of the audit was to evaluate the investigation, approval, and record keeping processes for Permits for Secondary (outside) Employment (regular work permit) and Motion Picture/Television Filming Work Permit (MPTFWP) Application/Renewal Forms of employees seeking secondary employment, and to determine compliance with Department policies and procedures as well as related City, State and federal regulations, if applicable.<sup>1</sup>

Audit Division conducted this audit under the guidance of Generally Accepted Government Auditing Standards,<sup>2</sup> specifically pertaining to performing the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our 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**

The Department recognizes that some employees wish to seek additional income; accordingly employees, both sworn and civilian, are allowed to seek outside employment. However, Department Manual Section 1/270.30, Outside Employment Policy – General, states, *“The nature of the law enforcement task requires Department employees to have the ability to work irregular schedules which are subject to change in meeting deployment needs. Additionally, it is necessary that employees have adequate rest to be alert during their tours of duty. For these reasons, and because certain activities are inherently incompatible with an employee's primary responsibility to the Department, the Department may impose conditions on outside employment or may prohibit it altogether. Determination of the degree of limitation will be based upon the interest of the Department and ensuring that the Department receives full and faithful services in return for its expenditure of resources.”*

Therefore, the Department requires all employees seeking secondary employment to submit a work permit application, Permit for Secondary Employment, Form 01.47.00, to the Area/division/group/bureau commanding officer (CO) through their immediate supervisor. The supervisor conducts an investigation by reviewing the application for completeness, ensuring the secondary employment does not conflict with any duty restrictions, documenting information discovered that may result in a denial of the application, and ensuring the requesting employee included copies of permits and licenses required to perform the secondary employment. For employment in the film industry, MPTFWP, Form 01.47.01, required accompanying documentation includes driver license, current motorcycle registration, and proof of insurance if the officer is requesting to use a motorcycle.

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<sup>1</sup>The Permit for Secondary Employment is also referred to as regular work permit in this audit report.

<sup>2</sup>U.S. Government Accountability Office, Generally Accepted Government Auditing Standards, December 2011 Revision.

Upon review of the work permit application, the CO recommends its approval or denial. If denied, the CO attaches an Intradepartmental Correspondence, Form 15.02.00, to the application stating the reason for denial. The CO then forwards all work permit applications, whether approved or denied, with all required documents to the designated entity for final approval. The Department designated Personnel Group to review all work permits for approval or denial. However, effective April 16, 2015, final approval or denial of MPTFWP applications was assigned to Emergency Operations Division (EOD) as follows:<sup>3</sup>

- A. The Assistant CO (ACO), Administrative Services Bureau (ASB), through the Administrative Services Unit (ASU), reviews and approves regular work permits for the following work types:
- Security;
  - Sales;
  - Instruction;
  - Consultant; and,
  - Others.
- B. The CO, EOD, through Contract Services Section, Film Unit, reviews and approves the MPTFWPs.

Upon final approval or denial, the designated entities enter the applications' information into the Comprehensive Automated Permit System (CAPERS).<sup>4</sup> The Information Technology Bureau uploads the following information into the employee's record in Training Evaluation and Management System (TEAMS) II from CAPERS:

- Expiration Date of the work permit;
- Type of work permit;
- Employer name; and,
- Division of employment.

## **PRIOR AUDITS**

Audit Division has not conducted prior audits related to the review of work permits.

## **AUDIT SCOPE AND METHODOLOGY**

Audit Division obtained a list from Application Development and Support Division (ADSD) of all work permit applications submitted by sworn and civilian employees from January 1, 2015, through June 30, 2015, as indicated in CAPERS. The list included 39 valid MPTFWP applications from active officers and 869 regular work permits. Retired sworn officers were not

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<sup>3</sup>Administrative Order No. 11, Department Reorganization, October 29, 2015, states that Personnel Group had been deactivated. The CO, Personnel Group, is now the Assistant CO, ASB, and will be referred to as such for the remainder of the audit report.

<sup>4</sup>There is no Department policy documenting this practice.



included in the scope of this audit. Audit Division examined all 39 MPTFWP applications and randomly selected 87 regular work permit applications resulting in 126 work permit applications reviewed for this audit.<sup>5</sup>

### **SUMMARY OF FINDINGS**

The audit was comprised of ten objectives/sub-objectives. Based on the test work performed, it is evident that the Area supervisors are reviewing the work permit applications, and the Area commanding officers are reviewing and recommending approval of the applications, as evidenced by their signatures. However, improvement is needed with the completion of the MPTFWPs as only 22 (56%) of the 39 applications reviewed were complete (Objective No. 1(a)). Emergency Operations Division is responsible for managing the MPTFWPs and is currently in the process of making changes to the MPTFWP procedures and application process.

Furthermore, 22 percent of the work permit applications contained inconsistent information, when compared to the information in the Comprehensive Automated Permit System (CAPERS), indicating a lack of a certification process. (Objective No. 3). See table for audit findings.

**Table No. 1 - Summary of Audit Findings**

<b>Obj. No.</b>	<b>Audit Objectives</b>	<b>Findings</b>
<b>1</b>	<b>Motion Picture/Television Filming Work Permit Application/Renewal Form was Properly Processed</b>	
1(a)	MPTFWP Application was Appropriately Completed	22/39 (56%) <sup>6</sup>
1(b)	Reviewing Supervisor and Area Commanding Officer Reviewed and Signed the MPTFWP Application	39/39 (100%)
1(c)	Employee Submitted All Required Documents with the MPTFWP Application	See Detailed Findings <sup>6</sup>
1(d)	Approval/Denial of the MPTFWP Application by Commanding Officer, Emergency Operations Division	39/39 (100%)
<b>2</b>	<b>Permit for Secondary Employment Application was Properly Processed</b>	
2(a)	Application was Appropriately Completed	77/87 (89%)
2(b)	Area Commanding Officer Reviewed and Signed the Application	86/86 (100%)
2(c)	All Required Documents Submitted with Work Permit Application	50/51 (98%)
2(d)	Approval/Denial of Application by Assistant Commanding Officer, ASB	86/86 (100%)
<b>3</b>	<b>Work Permit Application was Recorded Accurately into the CAPERS</b>	98/125 (78%) <sup>7</sup>
<b>4</b>	<b>Work Permit Application Information was Recorded Accurately into TEAMS II</b>	125/125 (100%)

<sup>5</sup>A one-tail test with a 95-percent confidence level and four percent error rate was utilized to determine the sample size.

<sup>6</sup>See Detailed Findings. The EOD is changing the current MPTFWP application process, to eliminate the requirement for personal information to be documented on the application.

<sup>7</sup>See Detailed Findings. The EOD is working with ADSD to modify CAPERS to allow more accurate data entry.

## **DETAILED FINDINGS**

### **Objective No. 1 - Motion Picture/Television Filming Work Permit Application/Renewal Form was Properly Processed**

Active duty officers submitting a valid MPTFWP application may be employed by studios to provide crowd/traffic control at filming locations. Certain activities require the presence of uniformed officers at locations such as street/sidewalk closures, intermittent traffic control, scenes where firearms are brandished in public and other filming considered to be high impact. All officers employed by the industry are required to wear the current Department uniform and maintain the current grooming standards. Officers working at a film location are required to have their Department-issued retired/active identification card with them.

All employees, sworn and civilian, who wish to engage in secondary employment with the motion picture/television industry shall complete, sign, and submit to their commanding officer a MPTFWP application. Emergency Operations Division is responsible for the final approval of MPTFWP applications.

### **Objective No. 1(a) - MPTFWP Application was Appropriately Completed**

#### **Criteria**

Department Manual Section 4/292.05, Employee/Retired Officer's Responsibilities, states, "*Active officers or retired officers seeking employment at motion picture/television filming locations shall:*

- *Complete the Motion Picture/Television Filming Work Permit Application/Renewal Form, Form 01.47.01; and,*

*Active officers. Active officers shall submit the completed application to his/her immediate supervisor for processing";*

#### **Audit Procedures**

Audit Division examined all 39 MPTFWP applications submitted to EOD from January 1, 2015, through June 30, 2015, for completeness by determining if they contained all required information.<sup>8</sup>

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<sup>8</sup>Due to the April 16, 2015, transition date whereby responsibilities for the MPTFWPs were transferred from ASB to EOD, 30 of the 39 MPTFWPs were approved by ASB and nine were approved by EOD.

## Findings

Communication with supervisors from EOD indicated that, due to their recent inclusion of responsibility of the MPTFWP process, they are making changes to the MPTFWP procedures and overall application. For example, information on the MPTFWP application, such as name of insurance company, insurance policy number, and policy date coverage were determined to be personal in nature, and therefore will no longer be required to be captured in the forthcoming new application; however, the information will still require verification by a supervisor upon submission at the Area/division. The EOD also determined that for this type of work permit, the form's employee address requirement is not feasible.

The initiation of the aforementioned changes came about because EOD identified a need for them. Auditors also identified that although each of the 39 MPTFWP were completed with most of the pertinent information, only 22 (56%) were completed in their entirety. Thirteen of the remaining 17 MPTFWP applications were missing at least one of the following: name of insurance company, insurance policy number, policy date coverage, or date signed by the CO. The last two applications indicated their employer's address to be "1358 Wilcox Ave." which is the address of Hollywood Community Police Station. Additionally, one indicated the name of the employer as "The City of Los Angeles" and the other as "Los Angeles Police Department." The issue of the employer and the employer's address may possibly be a misunderstanding and misconstrued as the employee's primary employer; nonetheless, because of the nature of these work permits, it is foreseen this particular requirement will be eliminated.

### **Objective No. 1(b) – Reviewing Supervisor and Area Commanding Officer Reviewed and Signed the MPTFWP Application**

#### **Criteria**

Department Manual Section 4/292.05, Employee/Retired Officer's Responsibilities, states, *"Supervisor's Responsibilities. A supervisor receiving a Motion Picture/Television Filming Work Permit Application/Renewal Form shall:*

- *Review the application for completeness;*
- *Acknowledge receipt of the application by completing the "SUPERVISOR REVIEWING APPLICATION" line";*
- *"Document any information discovered that may result in a denial of the request for motion picture/television filming employment;*
- *Forward the original application along with all associated documents to the requesting active officer's Commanding Officer";*

*"A Commanding Officer receiving a request for secondary employment at a motion picture/television filming location shall:*

- *Review the application for appropriateness;*

- *Ensure that the requesting active officer and reviewing supervisor have included copies of the required documentation;*
- *Review the documents to ensure the reviewing supervisor has conducted the appropriate investigation and that it does not conflict with any duty restrictions the active officer may have;*
- *Recommend approval or denial of the application by completing the 'CO, DIVISION OF ASSIGNMENT' line; and,"*
- *"Submit the application to the Film Unit, CSS, EOD."*

### **Audit Procedures**

Audit Division examined all 39 MPTFWP applications to determine if a review was conducted and approval/denial was indicated.

The Department met the standard if the work permits were signed and dated by the reviewing supervisors and Area COs as evidence of a review and approval/denial of the work permit applications.

### **Findings**

Each (100%) of the 39 MPTFWP applications met the standard for this objective.

### **Objective No. 1(c) - Employee Submitted All Required Documents with the MPTFWP Application**

#### **Criteria**

Department Manual Section 4/292.05, Employee/Retired Officer's Responsibilities, states, *"Supervisor's Responsibilities. If the active/retired officer is requesting to use a two-wheeled motorcycle, ensure that the requesting employee has included copies of his/her current driver's license endorsed for motorcycle operation, current motorcycle registration, and proof of insurance."*

*"Commanding Officer's Responsibilities. Ensure that the requesting active officer and reviewing supervisor have included copies of the required documentation";*

In addition, the Motion Picture/Television Filming Work Permit application/renewal form, states, *"This application must be accompanied with copies of the current motorcycle registration, proof of insurance, and valid driver's license endorsed for motorcycle operations."*

### **Audit Procedures**

Audit Division examined all 39 MPTFWP applications and determined that 26 involved the use of a motorcycle, which were assessed in this objective. Each application was reviewed for

attached copies of a current motorcycle registration, proof of insurance, and employee's valid Driver License classified for motorcycle operations.

## Findings

As with Objective No. 1(a), EOD is making changes to the current MPTFWP application. They identified copies of the current motorcycle registration, proof of insurance, and valid Driver License classified for motorcycle as containing personal information that should not be attached to the applications, as currently required. The attachment of these documents was not necessary for approval or disapproval of the work permit. The proposed new MPTFWP application would require the reviewing supervisor to verify the status and validity of these documents at the time it is submitted. Retention of the personal documents will not be required. A draft of the revised application was reviewed by AD (see Recommendation No. 1).

### **Objective No. 1(d) – Approval/Denial of the MPTFWP Application by Commanding Officer, Emergency Operations Division**

#### Criteria

Department Manual Section 4/292.05, Employee/Retired Officer's Responsibilities, states, *"Commanding Officer, Emergency Services Division's Responsibility. The CO, EOD shall":*<sup>9</sup>

- *"Review, process, and investigate each active and/or retired officer's Motion Picture/Television Filming Work Permit Application/Renewal Form;*
- *Make final approval or denial of each active and/or retired officer's application; and,"*

#### Audit Procedures

Audit Division examined all 39 MPTFWP applications for this objective.

The Department met the standard if the application was appropriately approved/denied and signed by the CO, EOD.

## Findings

Each (100%) of the 39 MPTFWP applications met the standard for this objective.

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<sup>9</sup>Audit Division is aware that the Department Manual Section 4/292.05 referred to Emergency Operations Division instead of Emergency Services Division; however, AD policy requires quoting the source document verbatim. Audit Division has notified Policies and Procedures Division of this error.

## **Objective No. 2 – Permit for Secondary Employment Application was Properly Processed**

Administrative Services Unit (ASU), ASB, reviews the Permit for Secondary Employment for completion and approval.<sup>10</sup> The ACO, ASB, approves or denies the work permit application. If denied, the CO indicates the reason on the application. Upon denial, the employee can appeal to the Chief of Police.

All employees, sworn and civilian, wishing to engage in regular (not motion picture/television) secondary employment shall complete and submit to their CO a Permit for Secondary Employment. Administrative Services Bureau is responsible for the final approval of the regular work permit applications.

## **Objective No. 2(a) - Application was Appropriately Completed**

### **Criteria**

Department Manual Section 3/744.20, Application for Permission for Outside Employment, states, “*Any employee wishing to engage in outside employment shall submit to their commanding officer four signed copies of a Permit for Outside Employment, Form 01.47.00.*”<sup>11</sup>

### **Audit Procedures**

Audit Division examined 87 regular work permit applications to determine if they were complete including at least one signed Permit for Outside Employment. Auditors were aware that Manual Section 3/744.20 requires four signed copies of the Permit for Outside Employment (Permit for Secondary Employment) and this is addressed in Recommendation No. 4.

The Department met the standard if the work permit was complete.

### **Findings**

Seventy-seven (89%) of the 87 regular work permit applications met the standard for this objective. The ten applications that did not meet the standard are detailed in Table No. 2.

**Table No. 2 – Incomplete Work Permit Applications**

<b>No. of Applications</b>	<b>Description</b>
8	‘Division of Employment’ field of the regular work permit application was left blank
1	‘Division of Employment’ field of the regular work permit application indicated ‘Employment’
1	Work permit application was unable to be located

<sup>10</sup>The Department Manual identifies Form 01.47.00 as “Permit for Outside Employment,” while the form itself is titled “Permit for Secondary Employment.” These titles are synonymous and will be referred to as “regular work permit” throughout this audit (See Recommendation Nos. 2 and 3).

<sup>11</sup>According to ASU, only one signed copy is required to process the work permit (See Recommendation No. 4).

Absence of certain information indicated a deficiency in the review for completeness. The consistency of the same information being left blank may be an indication of this information's insignificance. Moreover, this particular field of information assumes the employment takes place within the City of Los Angeles, when it may not. The absence of this information does not pose significant risk of liability to the Department. Based on the ten (11%) findings of the 87 regular work permit applications reviewed, and despite the apparent low risk, this is an issue that should be addressed in order to generate a complete application. Communication with supervisors from the geographic Areas and ASB indicated an understanding of the issue and will ensure that future applications are properly completed.

### **Objective No. 2(b) – Area Commanding Officer Reviewed and Signed the Application**

#### **Criteria**

Department Manual Section 3/744.32, Approval of Permit for Outside Employment, states, *“Following the investigation of a request for a Permit for Outside Employment, Form 01.47.00 (Manual Section 3/744.24), the commanding officer shall:*

- *Recommend approval or disapproval.*
- *If disapproval is recommended, write in the reason;*
- *If approval is recommended, certify that the concerned employee is qualified to perform the duties listed on the requested permit.*
- *Sign all four copies; and,*
- *Forward all copies to the Director, Office of Administrative Services, for approval or disapproval.”<sup>12</sup>*

#### **Audit Procedures**

Audit Division examined the 86 work permit applications to determine if a review was conducted and approval/denial was indicated.

The Department met the standard if the work permits were signed and dated by the Area COs as evidence of investigation and subsequent recommendation for approval/denial of the work permit applications.

#### **Findings**

Each (100%) of the 86 work permit applications met the standard for this objective.<sup>13</sup>

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<sup>12</sup>Administrative Services Bureau, which handles regular work permits, reports to the Office of Administrative Services.

<sup>13</sup>As stated in Objective No. 2(a), one of the 87 originally sampled work permits was unable to be located. The sample was not replaced since the audit field work was already completed; the required minimum sample size was still met. As of the completion of this audit report, the missing work permit was unable to be located.

During the review of the work permit applications, it was noted that seven applications (8%) did not have the receiving/reviewing supervisor signature. The Area commanding officer signed the applications, therefore assuming responsibility for them.

**Objective No. 2(c) - All Required Documents Submitted with Work Permit Application**

**Criteria**

The Department's Local Area Network section titled "Administrative Services/ASB Personnel & Operations/Administrative Support Unit/Work Permits/Secondary Employment Permits, states, *"All security-related work permit requests must be submitted with a copy of the firearm permit (if working in an armed capacity) and security guard registration."*

In addition, the seventh and eighth items of the checklist on the work permit application states,

- *"Are any Consumer Affairs Business Licenses or other licenses or permits required? (if yes, attach copies.)"*
- *"Is a copy of the current firearm/security guard permit attached? (if security related, attach copies.)"*

Department Manual Section 1/270.30, Outside Employment Policy - General, states, *"Exception: Outside employment in uniform may not be a prohibited activity in specific cases when a determination has been made by the Board of Police Commissioners that the employment is in the best interest of the City, promotes the Department's interest in public safety and the duties are substantially the same as those which would be performed if the employee were assigned on duty."*

According to ASU, the following locations and events are approved by the Board of Police Commissioners for Department sworn personnel to work off-duty in uniform at the time of this audit:

- City Commission Hearings/Community Redevelopment Agency;
- Dodger Stadium;
- Gibson Amphitheatre (formerly Universal Amphitheatre);
- Greek Theatre;
- Hollywood Bowl (traffic/crowd control only);
- Kodak Theatre;
- Nokia Theatre (LA Live complex);
- Staples Center;
- Los Angeles City Junior and High School Dances, Sporting Events and Graduation (on campus only);
- Los Angeles Convention Center;
- Los Angeles Memorial Coliseum;
- Los Angeles Memorial Sports Arena;
- Motion Picture/Television Filming locations (traffic control only);
- Movie Premiers (traffic/crowd control only); and,



- L.A. Live Complex.

Human Resources Bureau (HRB) Notice, Amendment Concerning Off-duty Armed Plainclothes Security, April 16, 1998, states, *“Effective immediately, any officer who can show proof that he/she has applied for the required firearm permit and security guard card will be allowed to begin employment as soon as his/her off-duty employment has been approved by Personnel Group.”*

### **Audit Procedures**

Audit Division examined 86 regular work permit applications and determined that 67 were for security-related employment. A review of the applications indicated 14 were exempt by the Board of Police Commissioners and two were security dispatchers, resulting in 51 work permit applications to be reviewed for this objective.

The Department met the standard if each qualifying work permit application was accompanied by a Firearms Permit, a Security Guard Registration, and/or applications for the aforementioned.

### **Findings**

Fifty (98%) of 51 work permit applications met the standards for this objective. The one that did not meet the standard did not have a valid Firearms Permit as verified via the Bureau of Security and Investigative Services.<sup>14</sup>

### **Objective No. 2(d) – Approval/Denial of Application by the Assistant Commanding Officer, Administrative Services Bureau**

#### **Criteria**

Department Manual Section 3/744.32, Approval of Permit for Outside Employment, states, *“Following the investigation of a request for a Permit for Outside Employment, Form 01.47.00 (Manual Section 3/744.24), the commanding officer shall”*:

- *“Forward all copies to the Director, Office of Administrative Services, for approval or disapproval.”*<sup>15</sup>

### **Audit Procedures**

Audit Division examined 86 regular work permit applications for approval/denial. If the regular work permit application was denied, a reason for denial must be documented on the form.<sup>16</sup>

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<sup>14</sup>The Bureau of Security and Investigative Services, Department of Consumer Affairs, is the California State agency that regulates the licensing for carrying firearms and the employment of security guards.

<sup>15</sup>The Director, Office of Administrative Services, delegated this responsibility to ACO, ASB.

<sup>16</sup>Included in the sample selected was one denial made by the Area. The Area indicated the reason for the denial; however, after further investigation, it was approved by the ACO, ASB.

The Department met the standard if the application was appropriately approved/denied and signed by the ACO, ASB.

### **Findings**

Each (100%) of the 86 regular work permit applications met the standard for this objective.

### **Objective No. 3 - Work Permit Application was Recorded Accurately into the CAPERS**

#### **Criteria**

According to Department practice, upon approval by the ACO, ASB, for the regular work permit or approval by the CO, EOD, for the MPTFWP application, the information is entered into CAPERS. See Recommendation No. 6.<sup>17</sup>

#### **Audit Procedures**

Audit Division reconciled the information between the 125 work permit applications (39 MPTFWP and 86 regular work permit applications) and the information entered into CAPERS.<sup>18</sup>

### **Findings**

The inconsistency of the information entered into CAPERS from the work permit applications indicated a lack of a verification process. Based on the 27 (22%) of 125 work permit applications reviewed, this appears to be an issue that needs to be addressed. Communication with supervisors from ASB and EOD indicated an understanding of the issues and ensured actions will be taken to verify accuracy of the information entered into CAPERS.

Twenty-five (93%) of 27 work permit applications were attributed to EOD. The inconsistencies were due to EOD intentionally not updating the signature dates of the initial/original work permit applications to maintain a record of the applications (application versus renewal). Given the results of this objective, EOD will ensure information entered into CAPERS is closely monitored. Furthermore, EOD is moving forward with requests to ADSD in modifying CAPERS to add data fields to include current/renewal signature dates, which will in effect resolve this issue.

Additionally, discussions with ASB revealed the field "Division of Employment" in CAPERS does not accept Topanga and Olympic Areas. Whenever the field is not completed by the applicant, ASB will complete the field in CAPERS as 'Unknown,' resulting in blank or Unknown fields in TEAMS II reports. These terminologies are necessary for TEAMS II to properly populate its report.

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<sup>17</sup>The fact that there is no Department policy requiring the use of CAPERS, the existence and use of it inherently serves as a process that memorializes this practice.

<sup>18</sup>The initial total for work permit applications was 126; however, one was unable to be located, as addressed in Objective No. 2(a), therefore 125 work permit applications were evaluated for this objective.

Ninety-eight (78%) of 125 work permit applications were entered into CAPERS. Table No. 3 summarizes the findings for this objective.

**Table No. 3 – Findings of Work Permit Information Entered into CAPERS**

Entities	Number Examined	Number Entered into CAPERS	Percentage Entered into CAPERS
Motion Picture/Television Filming Work Permit Applications	39	14	36%
Regular Work Permit Applications	86	84	98%
Total	125	98	78%

The information contained in the remaining 27 work permit applications was inconsistent with the information in CAPERS. The following inconsistencies are identified in Table No. 4.

**Table No. 4 – Summary of Inconsistencies between Work Permit Application and CAPERS**

No. of Applications	Date Employee Signed	Date Area Supervisor Signed	Date Area CO Signed	Date Bureau CO Signed	Work Type	Application's Expiration Date
15		X	X			
4		X				
3		X	X	X		
1	X	X	X	X		
1	X					
1	X	X				
1					X	
1						X

**Objective No. 4 - Work Permit Application Information was Recorded Accurately into TEAMS II**

**Criteria**

Department Manual Section 4/292.05, Employee/Retired Officer's Responsibilities, states, "*The Commanding Officer, Information Technology Bureau, upon electronic notification from EOD, must ensure that the approved Motion Picture/Television Filming Work Permit is posted in the active officer's TEAMS II report.*"

Currently, there is no Department policy that requires *regular* work permits processed by ASB to be posted to officers' TEAMS II report.

### **Audit Procedures**

Although no policy was referenced, auditors noted that ADSD uploads relevant information from CAPERS to TEAMS II for all work permits. Given that ASB utilizes CAPERS as well, all work permit applications were reviewed for this objective.

Audit Division obtained and examined TEAMS II reports for 125 employees who submitted work permit applications (39 MPTFWP and 86 regular work permit applications).

The Department met the standard if the approved work permit application was reflected in the officer's TEAMS II report.

### **Findings**

Each (100%) of the 125 TEAMS II reports met the standard for this objective.

### **OTHER RELATED MATTER**

Audit Division reviewed the information captured in TEAMS II to determine if the four fields of information were in fact being captured. TEAMS II automatically populates its Work Permit Information section by uploading the information directly from CAPERS. Therefore, TEAMS II is dependent upon information that is manually entered into the various Department systems (e.g., CAPERS). The Department systems managed by ADSD need to be involved in any modification of Department forms to ensure correct information is captured by the specific system, thus ensuring that information is appropriately uploaded into the TEAMS II reports. The TEAMS II reports are the employees' cumulative record for supervisors to effectively manage the workplace.

The TEAMS II report captures the following information related to the work permit application:

- Expiration date;
- Type of work;
- Employer; and,
- Division of employment.

A review of the above information captured in the TEAMS II report is detailed in Table No. 5.

**Table No. 5 - Breakdown of TEAMS II Information**

<b>TEAMS II Info Field</b>	<b>Regular Work Permits</b>	<b>MPTFWP</b>	<b>Total</b>
Expiration Date	86/86 (100%)	39/39 (100%)	125 (100%)
Type of Work	86/86 (100%)	0/39 (0%)	86/125 (69%)
Employer	86/86 (100%)	39/39 (100%)	125 (100%)
Division of Employment	32/86 (37%)	0/39 (0%)	32/125 (26%)

MPTFWP – All 39 (100%) were missing Type of Work. Division of Employment fields were all Unknown. However, for all 39 MPTFWP applications, “MPTF-Various” was documented in the Employer field, which satisfies the information needed for all three: Type of Work, Employer, Division of Employment.

Regular Work Permits – 54 of 86 (63%) regular work permits indicated Unknown for the Division of Employment. Of the 54, 14 (26%) were blank and 40 (74%) contained information that should have been captured as something other than Unknown.

A review of the above four fields of information revealed that the Type of Work, Employer, and Division of Employment, provides little to no benefit to management and therefore is considered low to no risk. The only information that provides any benefit is the work permit expiration date.

After reviewing the two work permit applications, CAPERS, and TEAMS II systems, it was determined that each can be better managed, so as to facilitate more efficient information documentation. Moreover, enhanced communication in regard to the aforementioned, between ASB, EOD, and ADSD may also assist in the overall process.

The number of missing data clearly indicates a lack of a verification process. Communication with supervisors from ASB and EOD indicated an understanding of the issues and ensured actions will be taken to verify completeness and accuracy of the information uploaded into TEAMS II.

### **RECOMMENDATIONS**

1. Emergency Operations Division is in the process of updating and revising the MPTFWP application and its processes. It is recommended that EOD discuss the changes with Policies and Procedures Division they intend to make in regard to the requirements of MPTFWP applications as they may affect current policies and procedures. See Objective No. 1(c).
2. A signature block on the Permit for Secondary Employment indicates a review and approval by the CO, Personnel Group. Due to the recent Department reorganization, Personnel Group has been deactivated. It is recommended that Policies and Procedures Division review and amend the Permit for Secondary Employment to reflect the correct approval process for regular work permits. See Objective No. 2.
3. Department Manual Section 3/744.20, Application for Permission for Outside Employment, states, “*Any employee wishing to engage in outside employment shall submit to their commanding officer [a] signed Permit for Outside Employment, Form 01.47.00.*” The term “outside employment” is used repeatedly in this section. However, Form 01.47.00 is titled, “Permit for Secondary Employment.” It is recommended that Policies and Procedures Division consult with ASB to determine the appropriate terminology and to make the changes accordingly. See Objective No. 2.

4. It is recommended that ASB and Policies and Procedures Division discuss the relevance of the Manual's requirement of four signed copies of the Permit for Secondary Employment and determine if it should be modified to reflect the current practice of only one signed copy being forwarded to ASB. See Objective No. 2(a).
5. Currently, the ASB website requires that "*All security-related work permit requests must be submitted with a copy of the firearm permit (if working in an armed capacity) and security guard registration.*" However, during the course of the audit, it was learned that the HRB Notice, April 16, 1998, allows for the Department of Consumer Affairs firearm permit and security guard registration applications to be submitted (attached) to the Department's work permit application.

It is recommended that ASB revise their section in the Department's Local Area Network and update the HRB Notice to indicate that *applications* for firearm permits and security guard cards can also be submitted with the Department's work permit request (application). See Objective No. 2(c).

6. It is recommended that ADSD modify CAPERS to include fields to capture the current/renewal signature dates. Additionally, Topanga and Olympic Areas should be added the Division of Employment field.  
See Objective No. 3.

#### **ACTIONS TAKEN/MANAGEMENT'S RESPONSE**

1. The findings were validated with the ACO, ASB, and the CO, EOD.
2. The audit report was provided to the ACO, ASB, and the CO, EOD, both of whom expressed general agreement with the findings and recommendations.
3. Application Development and Support Division agreed with the applicable recommendations.
4. Policies and Procedures Division agreed with the applicable recommendations.

INTRADEPARTMENTAL CORRESPONDENCE

ADDENDUM

May 31, 2016  
1.10

**TO:** Commanding Officer, Audit Division

**FROM:** Commanding Officer, Administrative Services Bureau

**SUBJECT:** SECONDARY EMPLOYMENT AUDIT – SECOND QUARTER  
FISCAL YEAR 2015/2016

Administrative Services Bureau is in general agreement with the findings and recommendations of the secondary employment audit conducted by Audit Division for the second quarter of fiscal year 2015/2016.

If you have any questions or concerns, please contact Police Administrator Francois Gardere, Assistant Commanding Officer, Administrative Services Bureau, at (213) 486-7060.



GLORIA GRUBE, Police Administrator  
Commanding Officer  
Administrative Services Bureau