



OFFICE OF THE COMPTROLLER  
CITY OF ST. LOUIS



**DARLENE GREEN**  
Comptroller

*Internal Audit Section*

Carnahan Courthouse Building  
1114 Market St., Room 642  
St. Louis, Missouri 63101  
(314) 622-4723  
Fax: (314) 613-3004

**DR. KENNETH M. STONE, CPA**  
Internal Audit Executive

July 29, 2011

Gene Stubblefield, Commissioner of Corrections  
Division of Corrections  
200 South Tucker Boulevard  
St. Louis, MO 63102

RE: Special Review (Project #2011-23)

Dear Mr. Stubblefield:

Enclosed is the Internal Audit Section's special review report of the Division of Corrections - Training Academy for the period of January 1, 2009 through June 30, 2010. A description of the scope of our work is included in the report. Fieldwork was completed on February 9, 2011.

This review was made under authorization contained in Section 2, Article XV of the Charter, City of St. Louis, as revised, and has been conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing*.

If you have any questions, please contact the Internal Audit Section at (314) 622-4723.

Respectfully,

Dr. Kenneth M. Stone, CPA  
Internal Audit Executive

Enclosure



# CITY OF ST. LOUIS

**DIVISION OF CORRECTIONS - TRAINING ACADEMY**

**SPECIAL REVIEW**

**JANUARY 1, 2009 THROUGH JUNE 30, 2010**

**PROJECT #2011-23**

**DATE ISSUED: July 29, 2011**

**Prepared by:  
The Internal Audit Section**



# OFFICE OF THE COMPTROLLER

**HONORABLE DARLENE GREEN, COMPTROLLER**

**CITY OF ST. LOUIS**  
**DIVISION OF CORRECTIONS - TRAINING ACADEMY**  
**SPECIAL REVIEW**  
**JANUARY 1, 2009 THROUGH JUNE 30, 2010**

**EXECUTIVE SUMMARY**

**Purpose**

The Internal Audit Section (IAS) has completed a special review of the Division of Corrections - Training Academy. The purpose was to determine if the Division of Corrections effectively and efficiently managed risks to ensure:

- Compliance with applicable laws, regulations, policies and procedures
- Safeguarding of Prisoner safety
- Reliability and integrity of prisoner grievance procedures
- Proper initial and subsequent continuing professional education training of officers

**Conclusion**

The opportunity exists for the Division of Corrections - Training Academy to improve internal controls. The following are the observations resulting from the review:

1. Opportunity to comply with initial training requirements
2. Opportunity to comply with firearms training requirement

Each of these observations is discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

  
Dr. Kenneth M. Stone, CPA  
Internal Audit Executive

  
Date

**CITY OF ST. LOUIS  
DIVISION OF CORRECTIONS - TRAINING ACADEMY  
SPECIAL REVIEW  
JANUARY 1, 2009 THROUGH JUNE 30, 2010**

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# INTRODUCTION

## **Background**

The Division of Corrections - Training Academy (Training Academy) provides the initial and subsequent continuing professional education training to law enforcement officers for the City of St. Louis. The Training Academy is a subdivision of the Department of Public Safety, Corrections Division. Academy personnel train officers in various areas of expertise, which include administration, housing and basic needs of pre-trial and post-trial detention inmates.

## **Purpose**

The purpose was to determine if the Training Academy effectively and efficiently manages risks to ensure:

- Compliance with applicable laws, regulations, policies and procedures
- Safeguarding of Prisoner safety
- Reliability and integrity of prisoner grievance procedures
- Proper initial and subsequent continuing professional education training of officers

## **Scope and Methodology**

The review was confined to evaluating Training Academy procedures, policies, and internal controls over the operational activities pertaining to officer's training. The audit procedures included inquiries of management and staff, observations of relevant processes, and reviews for compliance with policies and procedures, as well as applicable laws and regulations. Limited tests of controls and other procedures considered necessary were performed.

## **Exit Conference**

An exit conference was conducted at the Division of Corrections on June 1, 2011. The Training Academy was represented by Gene Stubblefield, Commissioner of Corrections and Lieutenant Kathryn Jones, Training Academy Director. The Internal Audit Section was represented by Craig Frazier, Auditor in-Charge and Mohammad Adil, Internal Audit Manager.

## **Management's Responses**

Management's responses to the observations and recommendations identified in the report were received from the Training Academy on June 7, 2011. These responses have been incorporated into this report.

## OBSERVATIONS

### Status of Prior Observations

There were no prior audits performed on the Training Academy.

### Summary of Current Observations

IAS noted that the Training Academy' management had established some control procedures to ensure effective management and training of its officers. These included, but were not limited to the following:

- Compliance with Federal regulations set forth by the National Institutes of Corrections.
- Performance standards that are based on Standards for Adult Local Detention Facilities Fourth Edition June 2004 by American Correctional Association
- Maintenance of the Correction Division's Policy and Procedures, and Safety Manuals.

The opportunity exists for the Training Academy to improve internal controls over the Academy's activities. The following are the observations resulting from the review:

1. Opportunity to comply with initial training requirements
2. Opportunity to comply with firearms training requirement

Each of these observations is discussed in more detail in the *Detailed Observations, Recommendations and Management's Responses* section of this report.

## **DETAILED OBSERVATIONS, RECOMMENDATIONS AND MANAGEMENT'S RESPONSES**

### **1. Opportunity To Comply With Initial Training Requirements**

Thirty-six correctional officers' personnel files, ten percent of the population, were reviewed to determine if the officers received the initial training as required by the Training Academy's training and employee development policy guidelines for the new hires. Of the 36 files reviewed, four (11%), did not have correctional officers' initial training documentations such as the copies of the training certificates or the documentation of hours of the initial training; therefore, it could not be determined if these four officers received the initial training.

Section IV 7B-10 of the Training Academy's policy guidelines require the Training Academy to provide 160 hours of initial training to new correctional officers. Section L of the guidelines also requires the Training Academy to issue a certificate of completion to officers at the end of successful completion of their initial training program.

The Training Academy did not have a system of internal controls in place to ensure that all correctional officers received the initial training in compliance with the requirements of its Policy Guidelines. Failure to maintain evidence of completion of required training on file could open the City to possible litigation if an incident occurs.

#### **Recommendation**

It is recommended that the Training Academy establish a system of internal control to ensure:

- All correctional officers receive the initial training when they are hired.
- Documentation is maintained in the correctional officers personnel files of the initial training completed and certification awarded.

#### ***Management's Response***

*The four Officers were hired prior to the implementation of the current training curriculum utilized by the Division's Training Academy to train all new employees. The Division has provided core curriculum training to these employees during mandatory annual in-service training. The in-service training curriculum is the same as the curriculum utilized to train new hires. Currently all Correctional Officers receive the initial training when they are hired as required by Divisional Policy. Documentation of all training is maintained in the employees' training file.*

## **2. Opportunity To Comply With Firearms Training Requirements**

Thirty-six correctional officers' personnel files, were reviewed to determine if these officers received firearms training as required by the Training Academy's training and employee development policy guidelines. None of the thirty-six officer's files or the Training Academy Director's master files reviewed had documentation of the most recent annual firearms training certification; therefore, it could not be determined if these officers received the required firearms training.

The weapon qualification procedures in the Adult Corrections Officers Core Training Course Manual require corrections officers to qualify with the 38-caliber pistol and 12-gauge shotgun. In order to qualify an officer must achieve a minimum score of 7 hits out of 10 targets for the shotgun and 35 hits out of 50 targets for the pistol. These requirements are necessary to graduate from the Training Academy. The corrections officers are also required to re-qualify annually.

The Training Academy stated that due to budget constraints only officers that have primary duties of escorting inmates off site were required to have annual firearms qualification. Failure to maintain the proper firearms certification for all corrections officers may increase the risk of improper or misuse of weapons. In addition, non-compliance with firearms training may lead to ineffectiveness in the performance of weapons related duties and may possibly open the City to litigation.

### **Recommendation**

It is recommended that the Training Academy establish a system of internal control to ensure all of its correctional officers have firearm certification before they are hired and are recertified annually.

### ***Management's Response***

*Although the Policy states that all Correctional Officers must be weapons qualified, the policy will be changed to reflect that all Correctional Officers must have no restrictions that prohibit them from carrying a weapon when necessary. The Division has a very limited amount of security posts that necessitates the possession of a weapon. Employees who are designated for assignments to Weapons Posts will be certified annually.*