



PERFORMANCE AUDIT

TRAINING ACADEMY

COMMONWEALTH OF PENNSYLVANIA

DEPARTMENT OF CORRECTIONS

AUGUST 2013

COMMONWEALTH OF PENNSYLVANIA

EUGENE A. DEPASQUALE - AUDITOR GENERAL

DEPARTMENT OF THE AUDITOR GENERAL



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EUGENE A. DePASQUALE
AUDITOR GENERAL

August 29, 2013

Honorable Tom Corbett
Governor
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania 17120

Dear Governor Corbett:

This report contains the results of a performance audit of the Training Academy of the Department of Corrections (Academy) from July 1, 2009, to June 30, 2012. The audit was conducted under authority provided in Section 402 of The Fiscal Code and in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

The report contains one audit objective along with an audit scope and methodology for the objective. Where appropriate, the audit contains findings and recommendations. The report notes that the Academy failed to: 1.) monitor training conducted at Corrections' facilities; 2.) conduct effective audits of employee training; and 3.) ensure compliance with, or provide guidance on Corrections' Policy 5.1.1.

We discussed the contents of the report with the management of the institution, and all appropriate comments are reflected in the report.

Sincerely,

A handwritten signature in cursive script, reading "Eugene A. DePasquale".

EUGENE A. DEPASQUALE
Auditor General

**Department of Corrections
Training Academy**

**Table
of
Contents**

Introduction and Background	1
Finding One – The Training Academy failed to adequately monitor employee training conducted at individual Corrections’ facilities.	5
Finding Two – The Training Academy failed to conduct effective reviews of employee training at individual Corrections’ facilities.	15
Finding Three –The Training Academy failed to ensure compliance with, or provide guidance on provisions of Corrections’ Policy 5.1.1 pertaining to the completion of training reports by the facilities.	24
Status of Prior Audit	31
Appendix A – Objective, Scope, and Methodology	33
Audit Report Distribution List	36

**Department of Corrections
Training Academy**

**Introduction
and
Background**

Department of Corrections

The Pennsylvania General Assembly created the Bureau of Corrections under the authority of the Pennsylvania Department of Justice with the passage of Act 408 of July 29, 1953, P.L. 1428 Section I. In December 1980, responsibility moved from the Pennsylvania Department of Justice to the Office of the General Counsel under the Governor. On December 30, 1984, the Governor signed Act 245 of 1984,¹ elevating the Bureau of Corrections to cabinet level status as the Department of Corrections.

According to the Department of Corrections' website,

Our mission is to reduce criminal behavior by providing individualized treatment and education to offenders, resulting in successful community reintegration through accountability and positive change.²

The Department of Corrections is responsible for all adult offenders serving sentences of two or more years. As of May 1, 2013, it operated 26 correctional institutions, 1 motivational boot camp, 1 training academy, and 14 community pre-release centers throughout the Commonwealth of Pennsylvania. In addition to the 14 community pre-release centers, the Department of Corrections also had oversight for 39 contracted facilities, all part of the community corrections program.³

As of March 31, 2013, the Department of Corrections employed 8,995 security staff and 5,408 persons in other staff positions.

¹ 71 P.S. § 310.1.

² http://www.cor.state.pa.us/portal/server.pt/community/about_us_our_mission/20857. Accessed May 22, 2013.

³ Ibid

**Department of Corrections
Training Academy**

Training Academy

The Pennsylvania Department of Corrections' Staff Development and Training Office or Training Academy as it will be referred to throughout this report, is responsible for planning, developing and implementing all department-wide training programs that are consistent with, and contribute to, the Department's mission, equal opportunity goals, and staffing requirements based on an employee learning needs⁴

The Training Academy's mission is as follows:

To provide quality staff development, training,
and support services for its stakeholders⁵

The goals of the Training Academy are to provide the latest training to all new employees and appropriate in-service training to veteran employees based on needs assessments done on a regular basis. At a minimum, the quantity and quality of training is intended to satisfy both Department of Corrections' training standards and American Correctional Association standards.⁶

Training for Corrections employees is provided at the Training Academy in Elizabethtown as well as at the 26 state correctional institutions and other Corrections' facilities. The guidelines for all Department of Corrections' employee training are contained in Corrections' Policy 5.1.1.

Training for new employees, referred to as basic training, is only conducted at the Training Academy while most training for veteran employees is conducted at the other facilities. According to Academy officials, in-service training is often held at the employee's home facility.

The length of basic training ranges from one to four weeks with the content of training depending on whether the employee is, or is not in contact with inmates. During the audit period from

⁴ Policy Statement, Commonwealth of Pennsylvania, Department of Corrections, Policy 5.1.1, Section 1, Staff Development and Training Office, (B)1 Responsibilities.

⁵ Department of Corrections, Policy 5.1.1, Section 1, Staff Development and Training Office, (A)1 Mission Statement.

⁶ Commission on Accreditation for Corrections Standards, Compliance Reaccredit Audit, Pennsylvania Department of Corrections Training Academy, September 10-11, 2012.

**Department of Corrections
Training Academy**

July 1, 2009, through June 30, 2012, the Academy provided basic training to approximately 3,364 new Corrections' employees.

In addition to conducting basic training, the Academy is also responsible for the administration and oversight of department-wide employee training including in-service training. The Academy is to ensure that all Corrections' employees receive department required training and that all facilities submit required employee training reports.

Training Academy Operating Expenses

The following table presents unaudited Training Academy operating expenses compiled from commonwealth accounting reports for the three years of the audit period.

Training Academy Operating Expenses For Fiscal Years Ended June 30, 2010, 2011, and 2012			
	2010	2011	2012
Detailed Operating Expenditures:			
Medical Care	\$92,625	\$91,750	\$100,690
Inmate Education & Training	85,739	87,956	96,390
State Correctional Institutions ⁷	(424,836)	\$284,175	(37,799)
General Government Operations	5,669,472	5,882,982	6,399,468
Culinary Training Program	-0-	-0-	81,651
Grand Total	<u>\$5,423,000</u>	<u>\$6,346,863</u>	<u>\$6,640,400</u>

**The Department of Corrections Employee Training
Monitoring System**

In their 2009-10 Annual Training Report, Training Academy officials stated, "Concurrent Technologies Corporation of Johnstown, through a Department of Justice grant, partnered with the Department [of Corrections] to develop the Corrections Learning Environment or CLE Framework Application. The

⁷ The negative balances are attributed to the Academy being responsible for operating and maintaining a uniform inventory warehouse for the department. The Academy is initially charged for the entire purchase of correction officer' uniforms for the department, however, once an institution orders and receives uniforms from inventory the related expenses are reallocated from the Academy and allocated to that institution. The negative balances at year-end are attributable to the timing of receipts and disbursements of uniforms from the inventory warehouse.

**Department of Corrections
Training Academy**

[CLE] is a centralized web-based system that aids the DOC [Department of Corrections] training community in their management of training needs.” The same report also stated that the CLE system was implemented into full production in July 2009.

At the entrance conference with the Training Academy on January 9, 2013, we asked officials whether the CLE system was operational and if the system allowed the Academy to monitor employee training department-wide. Academy officials confirmed that the CLE application failed to provide the Academy with the capabilities of monitoring employee training records from a centralized location. Academy officials further stated that neither the Department of Corrections nor the Academy had an automated system in place that enabled the Academy to electronically monitor employee training conducted department-wide.

“The Corrections Learning Environment system was never fully functional. The application never provided training reports and fell short of accurately recording employee training department-wide.”

According to the Academy’s Associate Director of Training Services, “The Corrections Learning Environment system was never fully functional. The application never provided training reports and fell short of accurately recording employee training department-wide.”

In response to the Academy’s continued need for a centralized system to monitor employee training on a department-wide basis, on Monday, March 11, 2013, the Department of Corrections began to utilize the Commonwealth’s new SAP-Learning Solutions (LSO), having no control over the implementation, scheduling, and resolving of issues with using the system. According to Academy officials, they believed this system would provide accurate information and would also provide the Academy with the ability to monitor employee training at all Corrections’ facilities.

However, the March 11, 2013 implementation date of the new system fell outside the scope of this audit, therefore, we did not test the accuracy of training records being maintained on this new application. Thus, we cannot comment on the effectiveness of the new training application in this report.

**Department of Corrections
Training Academy**

Finding One

The Training Academy failed to adequately monitor employee training conducted at individual Corrections' facilities.

The audit of the Training Academy's monitoring of employee training on a department-wide basis found the following deficiencies:

- The Training Academy did not review employee training at all Corrections' facilities.
- The fourth quarter training reports submitted by individual Corrections' facilities indicated significant deficiencies in employee training.
- The Training Academy did not ensure that training deficiencies cited during its annual reviews were corrected in a timely manner.

These deficiencies are discussed in more detail on an individual basis throughout this finding.

The Training Academy did not review employee training at all Corrections' facilities.

As part of the Academy's monitoring process, an internal auditor from the Training Academy annually visits individual Corrections' facilities and reviews⁸ the facility's employee training records to verify that all facility employees received training as required by Policy 5.1.1.

To determine whether reviews were being performed, we requested documentation of training record reviews conducted at 14 correctional facilities including, 11 of the 26 state correctional institutions, a boot camp, the Training Academy, and Corrections' central office. We also requested

⁸Department of Corrections Policy 5.1.1 Part II, Purpose: "Requires the Training Academy to establish a system of regular review of all Department of Corrections employee training." Department of Corrections Policy 1.1.2 requires an annual inspection of facilities be conducted by the Staff Development and Training Office (Training Academy).

The Department of Corrections uses the word "review" when referring to the Training Academy internal auditor's examination of employee training records. Throughout this report, we will use the word "review" when referring to this process.

**Department of Corrections
Training Academy**

documentation of reviews for 14 Corrections-operated community corrections centers during our audit period. The Academy provided reviews for 11 correctional institutions and the boot camp, but did not provide documentation of reviews conducted of employee training records at the Training Academy, Corrections' central office, or the 14 community corrections centers.

As of June 29, 2012, there were 530 Corrections' employees at the central office, 55 at the Training Academy, and 360 Corrections' employees at the 14 Corrections-operated community corrections centers. The Training Academy failed to review and verify the training records of these 945 Corrections' employees who comprise 6.6% of Correction's approximately 14,000 employees.

Corrections' Facilities Employee Training Records Not Reviewed For Fiscal Years Ending June 30, 2010 through 2012	
Facility	Number of Employees as of June 30, 2012
Central Office	530
Training Academy	55
14 Corrections-Operated CCCs	360
Total	945

In response to our concerns regarding the lack of monitoring at the facilities in question, the Academy's Associate Director for Training Services confirmed that, "(She) is responsible for ensuring that Corrections' training requirements are met department-wide." However, it is the facility managers (Superintendents) who are responsible to ensure their local training requirements meet department policy. The Training Academy has only a functional role to support and audit for training compliance at the local facility level.

Corrections' Policy 5.1.1 requires that all Corrections' employees at all facilities receive training. Specifically, the policy states,

It is the purpose of this policy to establish procedures for the staff development and training of all Department of Corrections'

**Department of Corrections
Training Academy**

employees, and to establish a system of regular review.⁹

By not conducting an annual review of all Corrections' employee training records, the Academy failed to ensure that the training reports submitted by these facilities were accurate and that facility employees received required training. The lack of this verification could result in an unsafe work environment due to employees not being sufficiently trained to respond to situations that may arise within the facilities. The lack of verification of required training could also result in serious civil rights violations of inmates and serious compromise of the Academy's mission "To provide quality staff development, training, and support services for its stakeholders."

The fourth quarter training reports submitted by individual Corrections' facilities indicated significant deficiencies in employee training.

According to the internal auditor, the Academy and the Department of Corrections considered a 90 percent attendance rate to be an acceptable completion rate¹⁰ for each training course reported on fourth quarter training reports. The fourth quarter report provides cumulative course attendance totals for the fiscal year. Our audit of the fourth quarter training reports submitted by 14 Corrections' facilities disclosed that facilities failed to attain 90 percent employee completion rate for many of the department's annual required training courses.

The Academy provided several reasons why the 90 percent goal was not met, including employees were needed to work in the institution on days when they were scheduled for training, employees were on extended leave from work including disability and military leave, and some employees just neglected to attend training. However, the Academy was unable to provide documentation in the facilities' review files supporting how these employees directly impacted the completion rates.

⁹ Department of Corrections Policy 5.1.1, Part II, Purpose.

¹⁰ The training course completion rate is calculated by dividing the number of employees who actually attended the course by the number of employees required to attend the course as based on their job description.

**Department of Corrections
Training Academy**

According to Policy 5.1.1, all Corrections' facilities were required to submit quarterly training reports to the Training Academy. This policy states:

Facilities [state correctional institutions], Community Corrections Centers, the Training Academy, and the Central Office complete and submit a Quarterly Training Report (Attachment 5-E) to the Staff Development and Training Office [Training Academy] not later than the 15th of the month following the end of the reporting quarter. The report contains the latest mandated training requirements as stated in Section 2.¹¹

The Corrections' quarterly report is a standard report that lists the required employee training courses at each facility. The report also contains two data input boxes for each course listed. One data box is to record the number of employees required to attend the course and the other box is to record the number of employees who actually completed the course.

The State Correctional Institution at Muncy's fourth quarter report for fiscal year 2011-12, reported complete employee information on 27 annually required employee training courses. In eight of the 27 courses Muncy did not meet the required 90 percent employee completion rate.

In the table on the next page we list the results of our review of the 14 facilities' fourth quarter training reports for 2011-2012. These results are for the courses in which the facility provided numerical data for both employees required to attend and for employees who actually attended the training course. Not all facilities provided complete information on all required courses. For the discussion of deficiencies related to incomplete training data reported on quarterly training reports, see Finding Three on page 19.

¹¹ Department of Corrections Policy 5.1.1, Section 5 Training Needs Assessments, Plans, Records and Reports, D.Training Reports, 3. Section 2, discusses the minimum training criteria for Corrections' employees.

**Department of Corrections
Training Academy**

14 Facilities Audited for Compliance with Annually Required Employee Training for Fiscal Year Ended June 30, 2012	
Department of Corrections' Facility	Percentage of Annually Required Training Courses below 90% employee completion rate¹²
Central Office	19.4%
Training Academy	56.5%
State Correctional Institution at Camp Hill	0%
State Correctional Institution at Chester	0%
State Correctional Institution at Graterford	100%
State Correctional Institution at Waymart	0%
State Correctional Institution at Muncy	29.6%
State Correctional Institution at Pine Grove	0%
Quehanna Boot Camp	14.8%
State Correctional Institution at Rockview	85.2%
State Correctional Institution at Albion	0%
State Correctional Institution at Greene	9.4%
State Correctional Institution at Pittsburgh	80.8%
State Correctional Institution Laurel Highlands	58.1%

Our audit found only five of the 14 facilities listed above reported a 90 percent completion rate or higher in all the annually required training courses. We could not audit for compliance with annual training requirements at the facilities that did not provide complete employee training data on their fourth quarter reports.

During our interviews, the Academy stated that, in some instances, the training data recorded on the quarterly reports is adjusted by the internal auditor during his review. However, our audit of the documentation that supported his adjustments revealed no evidence that would change the completion percentages recorded above. Further, annual reviews of employee training at the Academy and the Central Office were not conducted by the internal auditor therefore, no adjustments

¹² These percentages were calculated using the original (i.e., unadjusted) quarterly reports provided by the Training Academy.

**Department of Corrections
Training Academy**

were made. The Academy's internal auditor's procedures and our audit of adjustment documentation are discussed in more detail in Finding Two beginning on page 12.

Due to compliance with DOC training requirements being measured by course and its goal is a 90 percent course attendance rate it is possible that some Corrections' employees might not attend any training they are required to attend. That is a risk that exists when training requirements are not measured and monitored by individual employee. Also, having untrained or undertrained staff creates an unsafe environment within the institutions for inmates and Corrections' staff.

The Training Academy did not ensure that training deficiencies cited during its annual reviews were corrected in a timely manner.

Our audit of the executive summaries prepared on 12 correctional facilities¹³ during the audit period found that deficiencies cited during the internal reviews went uncorrected by the facility.

As part of his regular review, the Training Academy internal auditor annually visits individual facilities after which he prepares a report that Corrections refers to as the executive summary. In the executive summary, the internal auditor lists the employee training deficiencies he identified during his review.

The facility manager then prepares a plan to correct the deficiencies identified in the internal auditor's executive summary. This requirement is addressed in Corrections' Policy 1.1.2, Accreditation and Annual Operations Inspections Procedures Manual, Section 2, F.1 which states:

The Facility Manager/designee will respond to the inspection report with a written plan-of-action to address identified non-compliant items or problems via the Project Tracking Form.

The same section of Policy 1.1.2 further states,

¹³ 14 total facilities were examined as listed in the chart on page 8. However, employee training conducted at the Training Academy and the Central Office did not receive an annual review by the internal auditor.

**Department of Corrections
Training Academy**

The Regional Deputy Secretary/designee will review the Facility Manager's six month Corrective Plan-of-Action Progress Report¹⁴ and conduct a six month follow-up visit to monitor progress to ensure that the facility has corrected all noted deficiencies.

"I do not participate in the preparation of the corrective action plan and typically do not see the plan."

However, the internal auditor does not receive the corrective action plan prepared by the facility manager. The internal auditor stated, "I do not participate in the preparation of the corrective action plan and typically do not see the plan. When I return to the facility the following year, I review the deficiencies from the prior year."

The Training Academy did not receive a copy of the corrective action plan and did not follow up on identified deficiencies for a year. We noted several instances during our audit where deficiencies remained uncorrected for more than a year.

Our audit disclosed that four of the 12 facilities had at least one deficiency that was noted in multiple years and one of these four facilities had four training deficiencies noted in multiple years. The ongoing deficiencies at the four facilities included not meeting the requirements for annual training, on-the-job training, and special teams training, as well as not having the required training advisory committee. Failure to address these deficiencies in a timely manner may result in an unsafe work environment for Corrections' employees and independent contractors and an unsafe environment for inmates.

In summary, the Training Academy did not: 1.) review employee training records at all Corrections' facilities; 2.) ensure that required training courses were completed by Corrections' employees; and 3.) follow up with facility officials to ensure training deficiencies cited during reviews were corrected timely. Therefore, the Academy failed to meet its mission of ensuring all employees receive quality staff development, training, and support services.

¹⁴ Department of Corrections Policy 1.1.2, Section 2, Annual External/Internal Operations Inspections, Part B, Facility Responsibilities, states, "A **Corrective Plan-of-Action Progress Report** is prepared and submitted to the Regional Deputy Secretary six months following the date of the inspection."

**Department of Corrections
Training Academy**

Recommendations:

To ensure that Department of Corrections employee training is adequately monitored, the Training Academy should:

1. Comply with Corrections' policies requiring the review of employee training at all Department of Corrections' facilities.
2. Monitor all quarterly training reports throughout the year and take steps to ensure that each facility is on schedule to complete its required employee training at year-end
3. Obtain a copy of the corrective action plan from all facilities and monitor facility progress on the implementation of these corrective action plans by timely following up with the facility and/or the Regional Deputy Secretary after the corrective action plan was finalized.
4. Monitor and, when necessary, take action with individual facilities to ensure that employees receive required training.

Management Response:

Prior to, and independent of receiving this audit report the Training Academy began a comprehensive review of its auditing practice. As a result of that review the Academy is in the process of revising and developing policy and procedure to reinforce and improve compliance with mandated training. The outcome will affect the Department's Training Policy 5.1.1. as well as the development and implementation of local procedures and oversight processes. The result will be an auditing policy, procedure and process that will specify a detailed performance auditing audit process including the scope of the audit (to include all DOC run facilities) and compliance performance standards. The new process will include a risk management and corrective action plan that will be distributed to supervising authorities at the facility and the regional/central level.

**Department of Corrections
Training Academy**

Below are specific responses to the recommendations in the report.

Response to Recommendation 1:

The Training Academy will ensure that Central Office, the Academy and regional community corrections centers (through their regional offices) will be audited for training compliance. Note: Due to a “regional” type of organizational reporting structure for community correctional centers, training management and reporting is done through one of three regional offices.

Response to Recommendation 2:

The Academy does not currently have the resources to monitor quarterly reports and progress. A policy revision will outline the expectation that training compliance progress be monitored quarterly by the facility superintendent who has direct line authority over facility operations including training. It will include an expectation of alerting the Academy if the facility falls behind and projects significant deficiencies in getting the training completed. The Academy will function as a technical advisor to the facility when these circumstances occur.

Response to Recommendation 3:

A new or revised policy will ensure that the Academy will receive the corrective action plan in a timely manner. Timely follow up will be specified in policy, and through closer management and supervision practices of auditors. The Academy is exploring using the new automated system called AARMS to monitor compliance and reporting including “corrective action” monitoring. The system will soon be used to monitor compliance with the American Correctional Association accreditation standards. The new ACA module of AARMS is due to “go live” on August 26 of this year.

**Department of Corrections
Training Academy**

Response to Recommendation 4:

As mentioned above, this will be covered through new policy and procedures and more diligent management and supervision of the process.

Auditors' Conclusion:

We are pleased that the Academy agreed with our findings and that it is taking action to address our recommendations. During our next audit, we will determine whether our recommendations were implemented.

Department of Corrections
Training Academy

Finding Two**The Training Academy failed to conduct effective reviews of employee training at individual Corrections' facilities.**

According to the internal auditor and confirmed by the Academy, "During the audit period, no written procedures existed for conducting internal reviews of the facilities." This lack of written procedures contributed to the following Training Academy audit related deficiencies:

- The Academy failed to establish standard review procedures and its internal auditor failed to document the review process.
- The internal auditor's process of adjusting employee training data was flawed, resulting in inaccurate calculations of employee training course completion rates.
- The Academy failed to provide supervisory review of the internal auditor's work papers and of the adjustments he made to the fourth quarter reports submitted by the facilities during the audit period.
- The executive summaries prepared by the internal auditor were not supported by the original and/or adjusted quarterly training reports.

These deficiencies are discussed in more detail on an individual basis throughout this finding.

The Academy failed to establish standard review procedures and its internal auditor failed to document the review process.

Department of Corrections' Policy 1.1.2¹⁵ requires the Training Academy internal auditor, as part of the review process, to notify the facility to be reviewed one month in advance, note each standard reviewed and whether or not the facility is compliant with the standard, and to conduct an exit interview.

¹⁵ Policy 1.1.2 is the Department of Corrections Accreditation and Annual Operation Inspection Procedures Manual. See Section 2 C.

**Department of Corrections
Training Academy**

Although Corrections established the lines of communication for the review process, no Corrections' or academy policy provides guidance on the review process itself.

Through interviews with the internal auditor and his supervisor we obtained the following information on the review process: The internal auditor schedules a review of prior fiscal year training data.¹⁶ During the on-site review, the internal auditor uses a checklist of Policy 5.1.1 requirements, the facility's fourth quarter report as well as other documents such as correction officer trainee's on-the-job evaluation booklets to determine the facility's compliance with employee training. The internal auditor may also examine training course attendance sheets and between one to 10 employee training files as part of his review. At the conclusion of his review, the internal auditor summarizes the results in a document referred to as an executive summary. Before leaving the facility, the internal auditor also meets with the facility Superintendent to discuss the review results.

As part of our audit of the Training Academy's monitoring of Corrections' employee training, we evaluated documentation supporting the reviews conducted by the internal auditor.

To determine whether the internal auditor's documentation supporting his reviews was sufficient in detail to support the procedures he performed and his derived results, we examined documentation for five¹⁷ reviews conducted at two of 12¹⁸ correctional institutions.

Our audit of the review documentation disclosed that the information was incomplete and provided little to no evidence as to the purpose of the documents in relation to the review. Additionally, the files contained documents that were not applicable to the time period covered by the review.

¹⁶ For example, a facility's 2009-2010 fiscal year employee training records are reviewed during the 2010-2011 fiscal year.

¹⁷ Audit work papers were obtained and reviewed for three reviews of SCI Muncy and two reviews of SCI Pittsburgh. The 2011-12 audit of SCI Pittsburgh was not completed as of our review date.

¹⁸ Our test group included 14 Correctional facilities. However, the Training Academy did not review two of these 14 facilities (Training Academy and Central Office) and therefore, we were able to examine the reviews of only 12 facilities. See Finding One for our discussion of the Training Academy not reviewing employee training at all facilities.

**Department of Corrections
Training Academy**

The documentation we received was organized in file folders and although a label on each file folder listed the folder's contents, many of the folders did not contain documents. In those file folders that did contain documents, no information was given as to why these documents were included or how they were utilized during the review. The documentation included the compliance checklist completed by the internal auditor. However, the documentation did not include support for the check marks recorded by the internal auditor on this compliance checklist. Finally, we also noted some documents, such as the shift roster, were dated outside the review period and therefore, not applicable. According to the Academy, the shift rosters for Corrections Officer Trainee on-the-job training rosters are reviewed in the current fiscal year and are not part of the review period.

At a minimum, review documentation sufficient in detail to verify whether Corrections' employee training requirements were met should include a narrative discussing:

- The specific documents reviewed by the internal auditor
- What information was reviewed on each document and why it was reviewed
- What procedures were involved in the review of the documents
- The results of the document review

As a result of the incomplete documentation, we could not determine whether the reviews conducted by the internal auditor were adequate to measure a facility's compliance with Policy 5.1.1 training requirements. Additionally, without adequate documentation, the Training Academy could not be certain the reviews were conducted appropriately or that the results reported in the internal auditor's executive summary were accurate.

The internal auditor's process of adjusting employee training data was flawed, resulting in inaccurate calculations of employee training course completion rates.

During our audit of fourth quarter reports, we found that the internal auditor only made adjustments when the completion

**Department of Corrections
Training Academy**

rate¹⁹ for a course was below 90 percent. The internal auditor stated, “If the completion rate is 90 percent or greater, I do not review the facility’s records or make adjustments.” We also found that the internal auditor did not properly adjust the reports to determine each facility’s accurate completion rate.

According to the Academy, to determine the number of employees required to attend each course, the facility’s training coordinator consults the table included in Corrections’ Policy 5.1.1, Staff Development and Training which lists all required employee training. In addition to the name of the course, this table lists the category of employees required to attend. For certain courses all facility employees are required to attend while for other courses only specific categories of employees, such as corrections officers, are required to attend. Therefore, the number of employees required to attend varies depending on the employee’s job classification and the course. The internal auditor’s job is to determine the number of employees required to attend a training course and the number of those employees who actually completed the course in order to determine the completion rate.

When we asked the Academy why employees not required to take a course were taking it anyway, the Academy’s Associate Director of Training Services stated, “Sometimes facilities add employees to training who may not be required to take the training. For example, the facility may require food service area employees to take firearms training. Therefore, the number of employees listed in the quarterly report as attended does not necessarily correlate to those employees who are required to attend.”

While it is commendable that some facilities train additional employees, employees who were not required to attend training should not be included in the completion rate determination. Only those employees who were required to attend training should be included in the completion rate determination.

Employees who are not required to attend should be subtracted from the number who attended. According to the internal

¹⁹The individual training course completion rate is calculated by dividing the number of employees who attended the course by the number of employees required to attend the course.

**Department of Corrections
Training Academy**

auditor, he did not reduce the number of employees who attended the course by the number of employees who were not required to take the course in reviews he conducted during the audit period. However, he did lower the numbers of employees required to attend courses to reflect employees who were on various types of leave from work during the year.

The internal auditor also did not confirm whether employees subtracted from the required employee total should have been included in the counts.

In summary, in order to calculate accurate completion rates, the internal auditor must 1.) Review and appropriately adjust the number of employees who are required to attend training courses; and 2.) Verify that employees required to attend training actually attended. This must be done for all courses; even those courses with completion rates over 90 percent.

The Academy failed to provide supervisory review of the internal auditor's work papers and of the adjustments he made to the fourth quarter reports submitted by the facilities during the audit period.

The Academy failed to provide supervisory review over the internal auditor's work papers or the documents he compiled during his facility reviews. According to the Assistant Director of Training Services, "(She) does not review the internal auditor's working papers or the documents he compiles during his onsite reviews of employee training."

As a result any errors that the auditor may have made would have gone undetected. In response to this weakness in internal control we audited quarterly reports containing the internal auditor's adjustments and the related executive summaries to determine if the summaries accurately reflected the internal auditor's adjusted training numbers recorded on the quarterly reports.

The executive summaries prepared by the internal auditor were not supported by the original and/or adjusted quarterly training reports.

**Department of Corrections
Training Academy**

We examined employee training data adjusted by the internal auditor on seven reviews conducted at five of the facilities included in our test group of 14 facilities.

Specifically, we reviewed the courses required to be completed annually and noted the number of courses that had not achieved at least a 90 percent compliance rate. We noted significant discrepancies between the completion rates reported by the facility and the completion rates reported by the Training Academy's internal auditor in the executive summaries.

According to the Academy, the executive summaries prepared by the Training Academy's internal auditor should be supported by the facility's reviewed employee training records, including but not limited to the facility's reviewed fourth quarter training report. Our comparison of reviewed quarterly reports to related executive summaries found that this was not always the case.

In only two of the seven executive summaries did the internal auditor state that the facility was out of compliance with annually required training. However, our audit of training data recorded on the facilities' quarterly reports disclosed that the facilities were out of compliance with requirements in all seven reviews.

The executive summaries prepared on the seven reviews did not accurately reflect the employee training data (original and adjusted) recorded on the facility's quarterly training reports. In only two of the seven executive summaries did the internal auditor state that the facility was out of compliance with annually required training. However, our audit of training data recorded on the facilities' quarterly reports disclosed that the facilities were out of compliance with requirements in all seven reviews.

For example, the review of the State Correctional Institution at Laurel Highland's fourth quarter report for the fiscal year ending June 30, 2012, found 10 courses where the 90 percent employee completion rate was not met, but the related executive summary listed no deficiencies. The review of the State Correctional Institution at Muncy's fourth quarter report for fiscal year ending June 30, 2011, found 13 courses where the 90 percent employee completion rate was not met, but the related executive summary listed only 4 deficiencies.

The Academy's failure to provide supervisory oversight of the employee training reviews being conducted at the facilities resulted in the discrepancies and deficiencies listed above going undetected and unaddressed by Academy management.

**Department of Corrections
Training Academy**

In summary, the Academy failed to establish standard procedures to guide the employee training reviews conducted at Corrections' facilities. Documentation compiled by the internal auditor was insufficient to support the calculations and adjustments made to employee training data. Further, the adjustments to employee training data made by the internal auditor were not always consistent or accurate. The Academy also failed to provide supervisory review over the internal auditor's review procedures and work papers that he compiled during his facility reviews. Finally, the executive summaries prepared by the internal auditor did not always accurately reflect the employee training deficiencies contained on the facility's fourth quarter report.

Recommendations

To ensure that Department of Corrections' employee training is adequately monitored, the Training Academy should:

5. Develop written policies and procedures for the internal auditor's review of employee training records at Corrections' facilities. These policies and procedures should include, but not be limited to documentation of the following:
 - a. The employee training records the internal auditor is to review, how these records are to be reviewed and how to adequately document the review
 - b. How to make and document adjustments to the completion rates of the courses listed on the facility's fourth quarter training report
 - c. Who is responsible for reviewing the internal auditor's review of employee training records and how this review is to be performed and documented
6. Establish internal controls to ensure the executive summary prepared by the internal auditor is reviewed and approved by Academy management. Management's approval should signify that the findings contained in the summary are supported by the facility's employee training records and the internal auditor's review documentation.

**Department of Corrections
Training Academy**

Management Response:

Pursuant to the opening paragraph, the Academy will establish training audit policy and procedures within DOC policy 5.1.1 to efficiently and effectively manage field training audits. This will include what and how records will be reviewed, and how those records will be documented. We will formalize a standard checklist to be used by the audit team when conducting training audits to adequately document findings and deficiencies. Appropriate Academy management staff will review field audit results, reports and the executive summary. Documentation review at this level will be developed.

Prior to the receiving this report the Training Academy changed its practice to ensure the acceptable rate of completion for mandatory training is 100% of staff within the target complement minus staff not available for training due to their long-term absences.

Additionally, the Academy will develop and implement the following.

- *Create an audit team to be cross-trained to perform effective field training audits to review records and reports and be able to accurately reflect training audit results and reports.*
- *Design a standard course sign-in sheet requiring all facilities to use to accurately identify the specific target audience required to attend training, and to capture necessary employee information to verify and report completions.*
- *Re-design the training reports to accurately reflect and account for staff required to attend training, staff who take the training for non-mandatory purposes and staff on long-term absence. A worksheet has been developed to assist facility training coordinators to accurately account for staff that is available for required training.*

A workgroup consisting of field training coordinators is scheduled to meet September 5, 2013 to review current training report procedures. This workgroup will assist in developing

**Department of Corrections
Training Academy**

new processes, procedures and tools to improve compliance and reporting for mandated training in the Department.

Auditors' Conclusion:

We are again pleased that the Academy agreed with our findings and that it is taking action to address our recommendations. During our next audit, we will determine whether our recommendations were implemented.

Department of Corrections
Training Academy

Finding Three

The Training Academy failed to ensure compliance with, or provide guidance on provisions of Corrections' Policy 5.1.1 pertaining to the completion of training reports by the facilities.

Corrections' Policy 5.1.1 states:

Facilities [state correctional institutions], Community Corrections Centers, the Training Academy, and the Central Office complete and submit a Quarterly Training Report (Attachment 5-E) to the Staff Development and Training Office [Training Academy] not later than the 15th of the month following the end of the reporting quarter. The report contains the latest mandated training requirements as stated in Section 2

The audit of the Training Academy's oversight of provisions contained in Corrections' Policy 5.1.1 pertaining to the completion of training reports by the facilities found the following deficiencies:

- The Training Academy did not ensure the quarterly training reports submitted by facility training coordinators contained complete and accurate information on employee training.
- The Training Academy did not verify that the regional community corrections centers included training data for all Corrections' employees in their fourth quarter training reports.
- The Training Academy did not ensure that all Corrections' facilities submitted the required quarterly training reports.

These deficiencies are discussed in more detail on an individual basis in the following:

The Training Academy did not ensure the quarterly training reports submitted by facility training coordinators

**Department of Corrections
Training Academy**

contained complete and accurate information on employee training.

The audit of the training records for 14 Correctional facilities, and three community corrections center regional offices disclosed inconsistent procedures being used by training coordinators in the preparation of quarterly training reports. As a result, Corrections was not able to accurately report on whether its employees met their training requirements.

Our audit revealed that the numerical data representing the number of the employees required to attend, and the number of employees who actually attended training courses was incorrect.

The audit of fourth quarter training reports and discussion with the internal auditor disclosed the following inaccuracies:

- Training coordinators, at times, failed to record the number of employees who were required to attend a course and/or those employees who actually completed the course.
- The number of employees listed as attending training on the reports incorrectly included employees who were not required to attend the course.
- According to the internal auditor, the facility's training coordinator may have counted an employee more than once if the employee for some reason took the course more than once.

According to the internal auditor, he expects the quarterly training reports that are prepared by the facility's training coordinators to be accurate, even though the Academy did not provide the coordinators with any written procedures to use for guidance when completing the report.

We found that the lack of procedures contributed to facility training coordinators failing to properly complete quarterly reports. The improper completion of the quarterly reports resulted in inaccurate training data being reported, leaving Corrections with an unreliable tool to determine compliance with Corrections' Policy 5.1.1.

**Department of Corrections
Training Academy**

The Training Academy did not verify that the regional community corrections centers included training data for all Corrections' employees in their fourth quarter training reports.

The Academy confirmed that the regional community corrections center directors are responsible for submitting the quarterly training reports by region to the Academy. According to the Academy, the Department of Corrections operated 14 community corrections centers that were located in three regions within Pennsylvania. Employee staffing information showed that as of April 2013, Region 1 had three Corrections-operated centers and 57 employees, Region 2 had five Corrections-operated centers and 176 employees, and Region 3 had six Corrections-operated centers and 121 employees.

Our review of the three regions' fourth quarter training reports for fiscal year 2011-12, found that of the 42 annually required training courses listed on the reports, eight courses²⁰ were required for all Corrections' employees working at the centers. Region 2 reported that the number of employees required to attend each of the eight courses ranged from 92 to 122, significantly lower than the 176 employees working in the region.

Further, for six of these eight training courses, the number of employees who actually attended the courses was even less than the number of employees required to attend. The number of employees completing these six courses ranged from 84 to 112. Therefore, not only were the number of employees required to attend the eight courses well below the 176 employees, the number of employees who actually completed the training was at times less than half of the 176 employees located in the region.

In Regions 1 and 3 we found the same condition, however, the differences in these regions was not as great.

Finally, since the Academy only received employee training data from the 14 individual community corrections centers on a

²⁰ The eight courses consisted of the following: Bomb Threat and Mail Handling, Control of Two-Way Radios, Incident Command System, Fire Safety Training, Key Control, Right to Know Training, Tool Control, and Inmate Accountability.

**Department of Corrections
Training Academy**

regional reporting basis, the Academy has no way to evaluate employee training being conducted at each of the 14 community corrections centers.

When we asked why the numbers of employees required to attend mandatory training courses varied significantly from course to course the Associate Director of Training Services replied. “The variance may be due to staff turnover or part-time and contracted employees who can have different training requirements.” When we asked how the Training Academy ensures that the consolidated quarterly reports include employee training data from all Corrections’ employees working at all 14 Corrections-operated centers in that region the Academy replied, “This is the responsibility of the regional community corrections center director to ensure accuracy.”

However, as our review disclosed the regional corrections center directors did not include all employees at the Corrections-operated centers in their consolidated quarterly reports. Therefore, in addition to the monitoring deficiencies that we already discussed in Finding One, this was another example of the Training Academy not meeting its responsibility of ensuring that the training reports were accurate and that department employees received their required training.

The Training Academy did not ensure that all Corrections’ facilities submitted the required quarterly training reports.

Department of Corrections’ Policy 5.1.1 required all Corrections’ facilities submit quarterly training reports to the Training Academy. Regarding these reports, the Associate Director of Training Services stated, “Training Coordinators are responsible for emailing all quarterly training reports to the internal auditor.”

As noted by the Associate Director of Training Services, as important as the first three quarter reports are, it is the fourth quarter training report which is the key to determining whether employees have received the required training. The fourth quarter report includes the cumulative employee training totals for the year

However, the Academy did not ensure all facilities submitted their fourth quarter training report. In fiscal year 2010-11, two

**Department of Corrections
Training Academy**

facilities that we audited, state correctional institutions at Rockview and Greene, did not submit their fourth quarter training reports. The submission of the fourth quarter training reports is important not only for compliance with Policy 5.1.1 but also for the Academy's ability to meet its responsibility to ensure that all Corrections' employees receive the required training.

The audit also disclosed instances where facilities did not submit the first through third quarter training reports. For example, in fiscal year 2011-12, the Central Office did not submit the second and third quarter reports and the state correctional institution at Camp Hill did not submit the third quarter report. Further, in fiscal year 2010-11, the central office did not submit the first or third quarter reports.

Although the Training Academy stated it followed up with phone calls and emails when a training coordinator did not submit a report, the Academy's efforts to obtain the reports were unsuccessful. Therefore, the Academy was unable to evaluate the performance of the employee training program at these institutions for the time periods in question.

In summary, we noted that Department of Corrections' Policy 5.1.1 contained no guidance on the proper completion of the quarterly training reports. This omission plus the lack of standard written procedures from the Academy resulted in inaccurate and incomplete training reports being submitted by facilities, and community correction centers. These reporting deficiencies left the Training Academy unable to determine the true rate of facility compliance with required employee training.

Further, despite very clear guidance requiring Corrections' facilities to submit the quarterly training report, the Training Academy also did not ensure that all facilities complied with this requirement.

Recommendations

To ensure facilities comply with all provisions of Corrections' Policy 5.1.1 pertaining to the completion of the quarterly

**Department of Corrections
Training Academy**

training report and submit complete reports, the Training Academy should:

7. Ensure all training coordinators located at the state correctional institutions, Training Academy, Central Office and the community correction centers receive instruction on completing the quarterly training reports
8. Provide training coordinators with clear and consistent guidance on how to calculate the number of employees required to attend each course and the number of employees who completed the training
9. Require all training coordinators to provide complete information on the quarterly training report
10. Require the community correction centers to submit the quarterly training reports by individual center and not by region
11. Develop and implement internal controls to ensure that all Department of Corrections' facilities submit complete and accurate quarterly training reports to the Training Academy in a timely manner

Management Response:

Response to Recommendation 7:

The Training Academy has a two-day Training Coordinator conference planned for October 3/4, 2013. A comprehensive training of new processes and procedures will be presented to participants at the conference. Follow up training will be done as elements of the new process are finalized. Once new procedures in policy 5.1.1 are finalized training will be provided to all Training Coordinators. Annual refresher training will be conducted through the annual conference format.

Response to Recommendation 8:

**Department of Corrections
Training Academy**

A worksheet has been developed to assist facility training coordinators to accurately account for staff that is available for required training. This will be incorporated into procedures under DOC Policy 5.1.1.

Response to Recommendation 9:

This will be done through new procedures under revised DOC Policy 5.1.1.

Response to Recommendation 10:

Policy 5.1.1 revisions and new procedures will account for a regional reporting requirement and process that covers each community corrections center (CCC). Note that individual center reporting cannot be done due to the type of organizational arrangement for the community correctional centers. Training is managed at the regional level with a Training Coordinator at a regional location serving all facilities in that region. There are no resources at individual CCCs to report on training. That function is done by the regionally-based Training Coordinator.

Response to Recommendation 11:

New procedures in revised Policy 5.1.1 will identify internal controls that can be efficiently accomplished in the new LSO system. With the implementation of the Commonwealth's new training management system (LSO), it will allow for enhanced management and accountability for staff training. The capacity to review training completion records and provide training reports will be significantly increased. This will improve the accuracy of training data for all training reports.

Auditors' Conclusion:

We are again pleased that the Academy agreed with our findings and that it is taking action to address our recommendations. During our next audit, we will determine whether our recommendations were implemented.

**Department of Corrections
Training Academy**

**Status of
Prior Audit**

The prior audit report of the Training Academy covered the period July 1, 2005, through July 11, 2008, and contained five findings. Four of the findings (Findings 2, 3, 4, and 5) did not contain deficiencies and thus had no recommendations. The remaining finding (Finding 1), its accompanying recommendation, and the status of the Training Academy's implementation of the recommendation are presented below.

Scope and methodologies of the audit work

To determine the status of the implementation of the recommendations made during the prior audit, we held discussions with appropriate Training Academy personnel as part of, or in conjunction with, the current audit. We also obtained and examined documentation including training syllabi and monthly automotive reports.

Prior Finding One

**Monthly automotive activity reports were not accurate.
(Resolved)**

The audit report on the Training Academy covering the period July 1, 2005, through July 11, 2008 disclosed that the Academy failed to ensure the accuracy of the monthly automotive activity reports prepared by employees. Specifically, the audit of these reports found the ending mileage reported in one month did not agree with the beginning mileage for the following month. As a result, Academy management was unable to determine if automobiles were being properly used by its employees.

We recommended that the Academy train all staff, current and newly hired employees on vehicle policies and procedures.

In the Department's response dated February of 2010, the department agreed with the finding and stated that the Academy will train all new and existing staff on vehicle policies. This will be accomplished through mandatory in-service local training that will be offered as needed beginning in February 2010.

Status as of this audit. During the current audit, on February 7, 2013, the Academy's Acting Director confirmed that all Academy staff had received the recommended training. He

**Department of Corrections
Training Academy**

further stated this was completed through mandatory in-service training for current employees and through orientation for newly hired employees. The Academy provided documentation to support the Acting Director's statements.

As part of the follow-up to this prior finding, we also examined three consecutive months of automotive reports for four vehicles in the Academy's fleet. We found the reports were completed properly.

As a result of the interview with the Acting Director and the examination of the automotive reports, we concluded that the Academy had implemented the prior audit recommendation.

**Department of Corrections
Training Academy**

Appendix A

**Objectives,
Scope, and
Methodology**

The Department of the Auditor General conducted this special performance audit in order to provide an independent assessment of the Department of Corrections' Training Academy. Furthermore, we conducted this audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objectives. We believe that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

Objective

The overall objective of this special performance audit was to answer the following question:

Did the Training Academy through effective monitoring ensure that department-wide employee training requirements were met?

We accomplished this objective by focusing on the Training Academy's:

- Oversight of department-wide compliance with Corrections' training policies including but not limited to Policy 5.1.1 and Policy 1.1.2
- Methods of monitoring Corrections' employee training department-wide
- Effectiveness in monitoring Corrections' employee training throughout the fiscal year
- Effectiveness in reviewing employee training records at individual Corrections' facilities at fiscal year-end
- Sufficiency of Academy procedures ensuring that Corrections' employees received all required training

**Department of Corrections
Training Academy**

Scope

The scope of the audit was the period of July 1, 2009, through June 30, 2012, unless indicated otherwise.

Methodology

We designed the methodology to obtain sufficient, appropriate evidence to address the above-listed audit objective and to support the findings and recommendations. The methodology we used during this audit included the following activities:

- Reviewed all applicable commonwealth laws and regulations, management directives, as well as Department of Corrections' policies and procedures related to the training of Corrections' employees.
- Interviewed Training Academy personnel responsible for the oversight of the Department of Corrections' employee training including the Associate Director of Training Services and the Field Liaison Supervisor (internal auditor).
- Interviewed State Correctional Institution at Camp Hill training coordinators to obtain an understanding of the responsibilities associated with this position.
- Obtained and reviewed training needs assessments and annual training plans, submitted to the Training Academy by Department of Corrections' facilities, for compliance with the Department of Corrections' training reporting policies
- Obtained and evaluated quarterly training reports, submitted to the Training Academy by Department of Corrections' facilities, for compliance with employee training requirements and facility reporting requirements.
- Obtained and evaluated Training Academy executive summaries to determine the effectiveness of the Training Academy's review of Department of Corrections' facilities employee training records.

**Department of Corrections
Training Academy**

- Obtained and evaluated the documentation supporting reviews and executive summaries prepared by the Training Academy's internal auditor.

Academy management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the Academy is in compliance with applicable laws, regulations, contracts, grant agreements, and administrative policies and procedures. In conducting the audit, we obtained an understanding of the Academy's internal controls, including any information systems controls, as they relate to those requirements and that we considered to be significant within the context of the audit objective. We assessed whether those controls were properly designed and implemented. Any deficiencies in internal control that were identified during the conduct of the audit and determined to be significant within the context of the audit objectives are included in this report.

Findings and Recommendations

We developed three findings during the review of the Training Academy's oversight of the Department of Corrections' employee training and we present 11 recommendations to address the issues we identified. We will follow up during the next audit to determine the status of the findings and recommendations.

The expectation is that the findings and recommendations presented herein will improve the Training Academy's accountability and provide a framework for corrective action where necessary.

**Department of Corrections
Training Academy**

**Audit Report
Distribution List**

This report was distributed to the following individuals upon its release:

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The Honorable Robert M. McCord
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The Honorable John E. Wetzel
Secretary
Pennsylvania Department of Corrections

John Kaschak
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