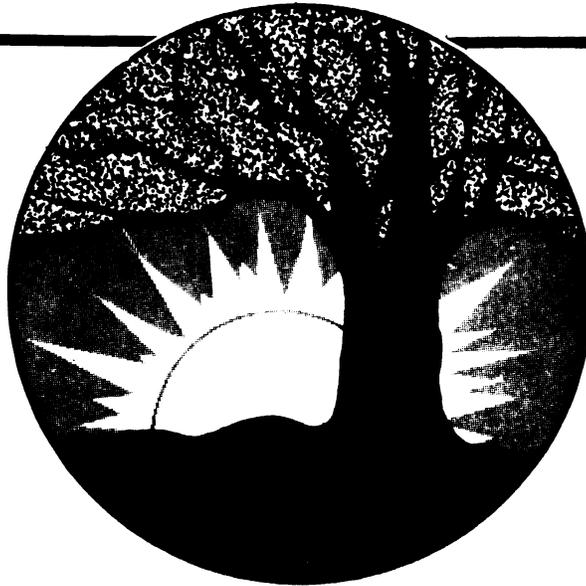


# PERFORMANCE AUDIT

**Peace Officer Standards and Training Commission  
and  
Law Enforcement Training Academy  
September 2008**



**John G. Morgan  
Comptroller of the Treasury**



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John G. Morgan  
Comptroller

September 30, 2008

The Honorable Ron Ramsey  
Speaker of the Senate  
The Honorable Jimmy Naifeh  
Speaker of the House of Representatives  
The Honorable Thelma M. Harper, Chair  
Senate Committee on Government Operations  
The Honorable Mike Kernell, Chair  
House Committee on Government Operations  
and  
Members of the General Assembly  
State Capitol  
Nashville, Tennessee 37243

Ladies and Gentlemen:

Transmitted herewith is the performance audit of the Peace Officer Standards and Training Commission and the Law Enforcement Training Academy. This audit was conducted pursuant to the requirements of Section 4-29-111, *Tennessee Code Annotated*, the Tennessee Governmental Entity Review Law.

This report is intended to aid the Joint Government Operations Committee in its review to determine whether the commission should be continued, restructured, or terminated.

Sincerely,

John G. Morgan  
Comptroller of the Treasury

JGM/dlj  
07-016

State of Tennessee

# Audit Highlights

Comptroller of the Treasury

Division of State Audit

Performance Audit  
**Peace Officer Standards and Training Commission  
and  
Law Enforcement Training Academy**  
September 2008

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## AUDIT OBJECTIVES

The objectives of the audit were (1) to determine if the Law Enforcement Training Academy (LETA) conducts periodic assessments of training fees charged to students, and adjusts fees when necessary; (2) to determine the need for non-LETA training academies in Tennessee and if efforts to monitor non-LETA academies are adequate; (3) to assess the use of officers in the state who are not certified by the Peace Officer Standards and Training (POST) Commission and the potential effects of such use; (4) to assess the role and training of constables in Tennessee; (5) to assess the adequacy of the POST Commission's/LETA's data management system; (6) to assess the POST Commission's policies and procedures for processing income supplement requests from local law enforcement agencies; (7) to determine if vacancies on the POST Commission are filled timely and what requirements exist regarding meeting attendance; (8) to summarize Title VI-related information for the POST Commission and LETA; and (9) to recommend possible alternatives for legislative or administrative action that may result in more efficient and effective operation of the POST Commission and LETA.

## FINDINGS

### **The POST Commission's Monitoring of the Non-LETA Training Academies Has Been Inadequate But Is Improving**

In addition to the Law Enforcement Training Academy in Nashville, the POST Commission is responsible for oversight of the ten POST-approved academies across the state. An auditor review of POST files, however, found that all agencies are not submitting annual reports, nor has the POST Commission conducted all on-site reviews. (The on-site reviews that had been performed appeared to be thorough in nature.) Failure to obtain such

information and conduct such reviews limits the POST Commission's ability to ensure the academies are in compliance with POST Commission guidelines, and thus, are training and graduating qualified officers. As a result of legislation that placed the Tennessee Highway Patrol under POST, effective July 1, 2006, the POST Commission received authorization to hire three investigators (who now perform the on-site reviews), along with two administrative secretaries and one administrative services assistant position. The first investigator position was filled in

December 2006, and by February 2007, all three positions had been filled. According to management, the POST Commission's goal will be to periodically audit all academies, but how often had not yet been determined (page 4).

#### **POST Commission Staff Do Not Have the Capability to Maintain and Monitor Data Electronically**

All files and records of officers certified by the POST Commission are maintained in a paper filing system. The POST Commission does not have a system in which records can be maintained and monitored electronically. As a result, staff's (and external auditors') ability to locate records and track data is impaired. None of the data we evaluated were available electronically, and auditors had to manually search through files in the agency's file room. While files are in alphabetical order, there are approximately 39,000 files, some with multiple listings and some for officers who are no longer certified or are deceased. Implementation of an electronic data system would increase the Post Commission's/LETA's ability to record and track data and allow staff to process requests (e.g., information requests from officers or law enforcement agencies) more efficiently and timely. Furthermore, a data system with appropriate step edits (controls) would result in more accurate information (page 6).

#### **The POST Commission Does Not Have a Policy Requiring Meeting Attendance**

The POST Commission serves as the primary regulatory body for Tennessee law enforcement. Among its statutory duties, the commission is charged with developing, planning, and implementing law enforcement training programs for all local law enforcement officers in Tennessee and establishing uniform standards for the employment and training of police officers. Despite this duty of public service, the commission does not have a minimum mandatory attendance requirement to ensure the presence of commission members at meetings. A review of meeting minutes for fiscal years ending June 30, 2005, 2006, and 2007 revealed that some commission members did not attend meetings on a regular basis. Poor attendance may affect the commission's ability to conduct business. It reduces the number of members available for a quorum and representation of interests specified by law. For the years under review, at least two meetings were conducted without a quorum (a minimum of nine voting members). For two additional meetings, auditors could not determine if a quorum was present because not all members were listed as either "present" or "absent" (page 8).

### **OBSERVATIONS AND COMMENTS**

The audit also discusses the following issues: the need for non-LETA training academies; formal policies implemented by the POST Commission that address concerns regarding the processing of income supplement requests; the adequacy of training fees; uncertified officers; constables in Tennessee; and the monitoring of local law enforcement agencies (page 9).

**Performance Audit  
Peace Officer Standards and Training Commission  
and  
Tennessee Law Enforcement Training Academy**

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**TABLE OF CONTENTS**

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	<u>Page</u>
<b>INTRODUCTION</b>	1
Purpose and Authority for the Audit	1
Objectives of the Audit	1
Scope and Methodology of the Audit	2
History, Statutory Responsibilities, and Organization	2
<b>FINDINGS AND RECOMMENDATIONS</b>	4
1. The POST Commission’s monitoring of the non-LETA training academies has been inadequate but is improving	4
2. POST Commission staff do not have the capability to maintain and monitor data electronically	6
3. The POST Commission does not have a policy requiring meeting attendance	8
<b>OBSERVATIONS AND COMMENTS</b>	9
Need for Non-LETA Training Academies	9
The POST Commission Has Implemented Formal Policies for Processing Income Supplement Requests, Addressing Concerns Initially Identified by Auditors	11
Adequacy of Training Fees	14
Uncertified Officers	14
Constables in Tennessee	17
Monitoring Local Law Enforcement Agencies	19
<b>RECOMMENDATIONS</b>	20
Administrative	20
<b>APPENDIX</b>	21
Title VI Information	21

# **Performance Audit Peace Officer Standards and Training Commission and Law Enforcement Training Academy**

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## **INTRODUCTION**

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### **PURPOSE AND AUTHORITY FOR THE AUDIT**

This performance audit of the Peace Officer Standards and Training (POST) Commission and the Law Enforcement Training Academy (LETA) was conducted pursuant to the Tennessee Governmental Entity Review Law, *Tennessee Code Annotated*, Title 4, Chapter 29. Under Section 4-29-229, the Peace Officer Standards and Training Commission was scheduled to terminate June 30, 2008, and is currently in wind-down, pending legislative action. The Comptroller of the Treasury is authorized under Section 4-29-111 to conduct a limited program review audit of the commission and to report to the Joint Government Operations Committee of the General Assembly. The audit is intended to aid the committee in determining whether the commission should be continued, restructured, or terminated. (The Law Enforcement Training Academy is not listed separately under the Governmental Entity Review Law. It was included in the 1997 and 2004 performance audits of the Department of Safety. Because of the academy's close relationship with the POST Commission and its recent transfer to the Department of Commerce and Insurance, LETA was included in this audit.)

### **OBJECTIVES OF THE AUDIT**

The objectives of the audit were

1. to determine if the Law Enforcement Training Academy (LETA) conducts periodic assessments of training fees charged to students and adjusts fees when necessary;
2. to determine the need for non-LETA training academies in Tennessee and if efforts to monitor non-LETA academies are adequate;
3. to assess the use of officers in the state who are not certified by the Peace Officer Standards and Training (POST) Commission and the potential effects of such use;
4. to assess the role and training of constables in Tennessee;
5. to assess the adequacy of the POST Commission's/LETA's data management system;
6. to assess the POST Commission's policies and procedures for processing income supplement requests from local law enforcement agencies;

7. to determine if vacancies on the POST Commission are filled timely and what requirements exist regarding meeting attendance;
8. to summarize Title VI-related information for the POST Commission and LETA; and
9. to recommend possible alternatives for legislative or administrative action that may result in more efficient and effective operation of the POST Commission and LETA.

## **SCOPE AND METHODOLOGY OF THE AUDIT**

The activities of the Peace Officer Standards and Training (POST) Commission and the Law Enforcement Training Academy (LETA) were reviewed for the fiscal years 2005 through 2007. The audit was conducted in accordance with the standards applicable to performance audits contained in *Government Auditing Standards* issued by the Comptroller General of the United States and included

1. review of applicable legislation, and POST Commission/LETA policies and procedures;
2. examination of POST Commission/LETA records, reports, and meeting minutes;
3. examination of prior performance audit and financial and compliance audit reports on the POST Commission/LETA, as well as such reports from other states;
4. interviews with commission and academy staff and staff of other state agencies that interact with the commission and academy; and
5. interviews with advocacy groups that interact with the POST Commission and LETA.

## **HISTORY, STATUTORY RESPONSIBILITIES, AND ORGANIZATION**

The Tennessee Law Enforcement Training Academy (LETA) was created in 1966 with the mission to train state and local law enforcement officers. Prior to this date, the only training was for officers in larger cities. Situated in Nashville, the academy operates five ten-week training classes annually, training 400-600 officer candidates, depending on hiring needs. In addition, the academy is also open to students pursuing a degree with a major in law enforcement or police science in a college or university in Tennessee. Approximately 55 percent of the academy's students are attending their initial law enforcement training. In addition to the LETA academy, LETA also provides oversight of ten academies across the state approved by the Peace Officer Standards and Training (POST) Commission.

In 1977, with federal dollars provided as a means to establish law enforcement training standards nationwide, the Law Enforcement Planning Agency was established. This agency, a predecessor to the POST Commission, was later dissolved in 1980. The POST Commission was created in 1981 and became functional the following year. The POST Commission's mission is to set minimum and ongoing training standards, and also pre-employment hiring standards,

thereby enhancing professionalism in the training of officers at LETA and other academies in Tennessee.

Pursuant to Section 38-8-104, *Tennessee Code Annotated*, the commission's responsibilities include developing, planning, and implementing law enforcement training programs for all local law enforcement officers in Tennessee; establishing uniform standards for the employment and training of police officers, including pre-employment qualifications and requirements for officer certification; establishing minimum standards and curriculum requirements for courses of study offered by or for any municipality, the state, or any political subdivision thereof, for the specific purposes of training police recruits or police officers; consulting and cooperating with local jurisdictions and educational institutions with regard to training; approving facilities used for training officers and recruits; issuing training certifications; and administering income supplements for police officers.

From 1966 to 1983, LETA (POST/LETA as of 1981) acted as an independent agency. However, in 1983 by executive order, it was moved to the Department of Safety. In July 2006, LETA and the POST Commission were moved under the authority of the Department of Commerce and Insurance. Historically, POST Commission standards and regulations have applied to local law enforcement officers and some state officers. As of July 1, 2006, however, POST Commission standards also apply to all newly hired Tennessee Highway Patrol officers, with existing officers to be grandfathered in. Today, LETA and the POST Commission are responsible for the training and regulation of 12,000 local officers and 2,500 state officers, including 900 Tennessee Highway Patrol officers. Exempt from POST Commission/LETA requirements are state park rangers, Department of Revenue officers, and Tennessee Wildlife Resources Agency officers. However, according to LETA management, these agencies generally will not hire officers unless they meet POST standards.

By statute, the POST Commission is composed of 18 members: two police officers below the rank of assistant chief, or equivalent rank; the attorney general and reporter; two sheriffs and two municipal chiefs of police who are appointed by the Governor and serve at the Governor's pleasure; two non-supervisory police officers; one member of the senate and one member of the house of representatives who are appointed by the respective speakers and who are non-voting members of the commission to serve for terms of two years; three citizens who are not connected with law enforcement—one to be appointed by resolution of the house of representatives, one appointed by resolution of the senate, and the third to be appointed by the Governor; and four additional members to be appointed by the Governor.

As of September 2007, the POST Commission had a staff of 6 employees, and LETA had a staff of 25. The director of LETA serves as the executive secretary of the POST Commission, and some LETA staff also provide services for the POST Commission. During fiscal year 2007, LETA had expenditures of \$3,642,200, and the POST Commission had expenditures of \$7,442,000. (Over 97% of the POST Commission's expenditures were operational expenditures, primarily for salary supplements to police officers who complete the required annual training.) Estimated fiscal year 2008 expenditures were approximately \$4 million for LETA and \$8 million for the POST Commission.

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## FINDINGS AND RECOMMENDATIONS

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### **1. The POST Commission's monitoring of the non-LETA training academies has been inadequate but is improving**

#### **Finding**

In addition to the Law Enforcement Training Academy (LETA) in Nashville, the Peace Officer Standards and Training Commission (POST) is responsible for oversight of the ten POST-approved academies across the state. The same POST Commission rules and standards that apply to LETA also apply to these academies. All training must be POST-approved in advance, and the academies are required to file with the POST Commission annual reports outlining continued compliance with minimum standards. In addition, POST Commission rules require that a POST Commission representative conduct an annual on-site visit to review continued compliance with the standards. An auditor review of POST files, however, found that all agencies are not submitting annual reports, nor has the POST Commission conducted all on-site reviews. Failure to obtain such information and conduct such reviews limits the POST Commission's ability to ensure the academies are in compliance with POST Commission guidelines and thus are training and graduating qualified officers.

These academies are all administered by governmental entities—the POST Commission does not approve privately operated academies. Two are operated by the Board of Regents at Cleveland and Walters State Community Colleges, located in Cleveland and Morristown, respectively. One is operated in Donelson by the Tennessee Highway Patrol (THP), which only trains its own personnel. The remaining academies are operated by law enforcement agencies in county or municipal governments: the Metro Nashville Police Department, the Memphis Police Department, the Shelby County Sheriff's Department, the Chattanooga Police Department, the Knoxville Police Department, the Knox County Sheriff's Department, and the Blount County Sheriff's Department, whose academy was approved by the POST Commission as of June 15, 2007.

For 2006, six of the nine academies (excluding Blount County) submitted their annual reports, and for 2005, only four of eight did so. (The THP academy only came under POST guidance in July 2006 and thus is not included in the 2005 totals.) The POST Commission did not receive a report in either year from the Shelby County Sheriff's Department, the Chattanooga Police Department, or the Metro Nashville Police Department. No report was received from Walters State Community College for 2005. Based on auditors' review of the reports received, academies reported on their activities for that year, outlining their continued compliance with minimum standards, including the numbers and sizes of recruit classes, numbers of graduates, details of training and in-service, and other relevant information.

As of February 2008, POST had reviewed seven of the non-LETA academies. Audits of the Knoxville Police Department and the Knox County Sheriff's Department were conducted in May 2007. The Memphis Police Department, Shelby County Sheriff's Department, and the Metro Nashville Police Department were reviewed in September through October 2007. In addition, a review of the THP academy was conducted in November 2006, for POST-certification as a basic training academy, and the Blount County Sheriff Department's academy was reviewed in May 2007 for approval to establish a new academy. The on-site reviews found that all of the academies reviewed met or exceeded POST requirements. Three of the academies had not been reviewed, and the POST Commission/LETA was unable to provide documentation of any on-site reviews conducted prior to late 2006.

The on-site reviews performed appeared to be thorough in nature. For example, items reviewed included dates of training sessions and class schedules, lists of instructors and their qualifications (training staff must include at least two full-time staff who are certified as Academy Instructors), and verification that topics of instruction meet or exceed 400-hour minimum curricula requirements. The topics of instruction must include firearms, emergency medical training, patrol procedures, interpersonal communications, professional and ethical conduct, physical defense tactics, criminal and constitutional law and procedures, written communications, human relations, criminal justice system, police stress, administration, emergency vehicle operation, and National Safety Council defensive driving. Other requirements address standards of buildings and facilities, firing range and police driving skill ranges, record keeping, and control of environment (i.e., control of the student environment to promote efficient learning).

According to its director, LETA would like to inspect the academies annually but in the past has been unable to do so because of staff shortages. Prior to July 2006, LETA's assistant director served as the only on-site reviewer, along with performing his usual management duties. Unless something noteworthy occurred at an academy that required an investigation, the academies were not reviewed. However, as a result of legislation that placed THP under POST, effective July 1, 2006, the POST Commission received authorization to hire three investigators (who now perform the on-site reviews), along with two administrative secretaries and one administrative services assistant position. The first investigator position was filled in December 2006, and by February 2007, all three positions had been filled. According to management, the POST Commission's goal will be to periodically audit all academies, but how often has not yet been determined.

### **Recommendation**

The POST Commission should require that all academies submit annual reports as required, and follow up the reports with routine on-site reviews to ensure all academies adhere to POST Commission requirements.

## **Management's Comment**

We concur. With the additional personnel afforded the POST Commission in the July 1, 2006, transfer to the Department of Commerce and Insurance, we are now adequately staffed to monitor the other Law Enforcement Academies. Annual reports are going to be required of the other academies, and on-site reviews of each academy will be performed annually by a POST investigator. While an annual on-site review may not be as extensive as the ones already performed and referred to in this finding, there should be an annual on-site visit by at least one person with extensive review every two to three years to ensure compliance.

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### **2. POST Commission staff do not have the capability to maintain and monitor data electronically**

#### **Finding**

All files and records of officers certified by the POST Commission are maintained in a paper filing system. The POST Commission does not have a system in which records can be maintained and monitored electronically. As a result, staff's (and external auditors') ability to locate records and track data is impaired.

The lack of a data system impeded auditors' ability to conduct fieldwork in a timely and efficient manner. None of the data we evaluated was available electronically, and auditors had to manually search through files in the agency's file room. While files are in alphabetical order, there are approximately 39,000 files, some with multiple listings and some for officers who are no longer certified or are deceased. Active and inactive officer files are mixed, and the only manner in which to determine if an officer is active is to see if a change of status form is in the file. While conducting a file review, auditors were not able to locate some files and often required assistance from POST Commission staff.

POST Commission management and staff acknowledge that the ability to maintain and monitor data electronically would improve the agency's functions. For example, staff are not able to generate a report of an officer's training history because that information is not maintained on a computer. If an officer requests his or her training history, POST Commission staff have to go through the officer's paper files to compile a list of classes.

Another process that is time-consuming for staff is processing supplemental pay requests. In 2005, the POST Commission received supplemental pay requests for 11,853 police officers. To verify that each officer was eligible to receive pay, staff had to review the paper file for every officer listed. In addition, staff also reviewed the files of all ineligible officers listed on an agency's Salary Supplement Reporting Roster to ensure the information reported for these officers was accurate. (Auditors were not able to obtain data on the number of ineligible officers reported.)

Auditors determined that the average number of days to process and pay a Salary Supplement Request is 156 days. Of the 357 agencies that submitted a request, 45 agencies did not receive payment for 200 or more days from the date the request was received by POST. Our calculations were based on data from the 2005 Salary Supplement Reporting Roster provided by staff. Nine agencies were excluded from our calculations because dates recorded were not logical, e.g., the date processed was recorded as a date that occurred before the date received, reflecting errors in the information created by POST staff.

Implementation of an electronic data system would increase the POST Commission's/ LETA's ability to record and track data and allow staff to process requests more efficiently and timely. Furthermore, a data system with appropriate step edits (controls) would result in more accurate information. For example, step edits could identify an illogical date and prevent it from being entered.

According to management, the POST Commission/LETA will become automated when the Department of Commerce and Insurance's MARS (Multi-agency Regulatory System) system is implemented. (As of July 2008, implementation of MARS, scheduled at the time of our audit work for spring 2008, was on hold because of difficulties with the software identified by the Department of Education, which was the first agency to begin using MARS.) The POST Commission/LETA is also participating in the statewide Edison project. (Edison is the State of Tennessee's Enterprise Resource Planning system, an integrated software package that is used to perform administrative business functions. Edison modules use a common database that allows the system to share information between business functions within an agency and across agencies statewide.) Management hopes to use technology money allocated in the budget to hire a staff person dedicated to information systems.

### **Recommendation**

Management of the POST Commission/LETA should continue efforts to implement electronic maintenance of records and files. In the interim, management should consider what steps staff might take (e.g., removing files of deceased or inactive officers) to improve the existing recordkeeping system.

### **Management's Comment**

We concur. In keeping with the recommendations of this finding, POST Commission management is seeking out a software package and looking at other states' examples to modernize our data management system. It is highly unlikely the MARS System will be implemented by the Department of Commerce and Insurance. We've been encouraged by the department to seek other options. In the meantime, we have obtained the file server space to implement a Windows-based Access database program to better manage the record files in order to organize officer and department files as recommended in this finding. Just by the

implementation of this rudimentary database program, we will be able to keep an accurate record of officers' career path in a database file rather than the labor-intensive paper system.

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### 3. The POST Commission does not have a policy requiring meeting attendance

#### Finding

The POST Commission serves as the primary regulatory body for Tennessee law enforcement. Among its statutory duties, the commission is charged with developing, planning, and implementing law enforcement training programs for all local law enforcement officers in Tennessee and establishing uniform standards for the employment and training of police officers. Despite this duty of public service, the commission does not have a minimum mandatory attendance requirement to ensure the presence of its 18 commission members at meetings.

A review of meeting minutes for fiscal years ending June 30, 2005, 2006, and 2007 revealed that some commission members did not attend meetings on a regular basis. The table below shows the number of voting commission members who missed at least half of the meetings (within the scope of their appointments) for each year under review. One commission member only attended 2 of 32 meetings within the scope of appointment.

	POST Commission Meeting Attendance		
	FY 2005	FY 2006	FY 2007
Number of members who missed at least half of the meetings	3	3	4

Poor attendance may affect the commission's ability to conduct business. It reduces the number of members available for a quorum and representation of interests specified by law. For the years under review, at least two meetings were conducted without a quorum (a minimum of nine voting members). For two additional meetings, auditors could not determine if a quorum was present because not all members were listed as either "present" or "absent."

According to the POST Commission's Executive Secretary, there is no policy requiring members to attend meetings. He further stated that the commission has discussed adopting such a requirement but ultimately decided against it in deference to the appointing authorities. Currently, the commission does not have bylaws guiding the procedural aspects of meetings. While the commission follows its own rules and regulations and *Robert's Rules of Order*, neither of these include requirements for meeting attendance.

Beginning in January 2007, eight new members were appointed to the commission as other members' terms expired (and the vacancies were filled). Only one of the four members who missed at least half of the meetings in 2007 was reappointed to the commission, and there have been no attendance problems since the new appointments were made. However, without a

mandatory attendance requirement, the commission has no means to enforce a member's presence at a meeting.

### **Recommendation**

The POST Commission should consider adopting a mandatory attendance requirement to ensure the presence of commission members at meetings. The commission should then notify the appointing authorities if their appointees fail to meet those meeting requirements. The POST Commission should consider establishing bylaws to govern the procedural aspects of commission meetings. Commission staff should record attendance (or absence) of all members at each meeting.

### **Management's Comment**

We concur in part. The POST Commission has discussed in years past meeting attendance from within the membership of the commission. Rule-making attempts have been made in the past to require meeting attendance of its members. However, due to the statutory make-up of the POST Commission, and the fact that every member is appointed by another entity, it would be difficult for the POST Commission to make any sanction on members for lack of attendance. (The vast majority of members are appointed by the Governor, coterminous with his term; four members are named by the House and Senate; one member is a designee of the Attorney General's Office; and the Executive Secretary is by statute the Director of the Law Enforcement Training Academy.) However, it shall be the policy of the POST Commission to notify the Governor's Boards and Commissions office in the event of attendance problems or other impairments to a member of the commission.

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## **OBSERVATIONS AND COMMENTS**

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The topics discussed below did not warrant a finding but are included in this report because of their effect on the operations of the Peace Officer Standards and Training (POST) Commission, the Law Enforcement Training Academy (LETA), and the citizens of Tennessee.

### **NEED FOR NON-LETA TRAINING ACADEMIES**

It appears a need exists for non-LETA training academies in Tennessee. While LETA could physically train a larger number of officers in its basic classes, it has chosen to limit class size. Students currently wishing to enroll in classes must wait up to six months to attend basic training at LETA.

LETA conducts five ten-week basic training classes annually (beginning in January, March, May, August, and October). While each class can hold a maximum of 120 slots, academy management has chosen not to operate at full capacity in order to have a more manageable class size. LETA advertises a capacity of 80, but this number will generally grow leading up to the class date to address any agency's emergency need due to the six-month rule. (POST Commission Rule 1110-2-.03[3] requires any officer seeking certification who meets pre-employment requirements to complete the training course within six months of employment.) Because officers must complete the basic POST training within six months of employment, local agencies and officers sometimes have to seek a class opening at the last minute to meet this requirement.

As of July 31, 2007, LETA's basic training class beginning in August was already filled, as was the next class scheduled to begin in October. The August and October 2007 and the January and March 2008 classes were all filled and completed. As of July 29, 2008, the class beginning in May 2008 was in progress and is scheduled to graduate 90 officers (an all-time high number of graduates according to LETA's director). The August 2008 class is already filled, but the class scheduled to begin in October 2008 was not yet full.

The five non-LETA academies that provided reports for 2006 (Cleveland State, Walters State, the Memphis Police Department, the Knoxville Police Department, and the Knox County Sheriff's Department) offered 19 basic training classes that trained a total of 440 officers. During the same year, LETA offered 5 classes training a total of 395 officers.

While it appears a need exists for non-LETA training academies, LETA management questions the quality of training offered by these institutions. According to LETA management, LETA consistently receives feedback from chiefs of police and sheriffs that the non-LETA trained officers are not as prepared. LETA management believes the LETA program training is more standardized, as LETA provides a staff of nine full-time instructors, while the non-POST academies may have only two full-time accredited instructors.

LETA management believes that other agencies want to operate their own academies in order to be independent and to make money in doing so. The non-LETA agencies primarily train their own personnel, but some accept officers from other law enforcement agencies. Neither LETA management nor the POST investigators were able to provide any cost data that would lead to a meaningful analysis of the cost efficiency of using the non-LETA academies. Auditors contacted both LETA and the non-LETA academies to determine if any cost comparisons have been conducted. While it appears that most of the academies have conducted at least a rough analysis of costs, none of them have conducted anything that would determine actual training costs. None of the academies included all cost factors, nor were they consistent in the factors considered. Most of the analysis conducted by the non-LETA academies focused either on salaries paid to employees while they attended classes and/or instructor fees.

Conducting any meaningful cost-benefit comparisons between LETA and the non-LETA academies appears difficult because the academies are different in nature. For example, costs at the non-LETA academies, because they are generally used to train that agency's officers, would

include hiring costs and normal employee costs, including salaries, benefits, and other administrative costs. Also, costs associated with the community college academies at Cleveland State and Walters State include normal college tuition costs as officers attending these academies are actually enrolled in college-credit classes.

Management at the non-LETA academies believe that their academies were initially developed as a means of alleviating the large class sizes at LETA. Some emphasized that the sheer number of officers that LETA must train each year limits the basic class to 450 hours. The Tennessee Highway Patrol (THP) academy itself conducts a 1,300-hour basic class. Management at the non-LETA academies believe that while LETA does a great job, utilizing excellent instructors, it cannot offer more hands-on training because of the class sizes, is limited in the areas covered because of time constraints, and is unable to specialize in areas unique to local jurisdictions. For example, the local police and sheriff's departments emphasized the need for instruction in process serving, court security, radio systems, and paperless record databases. The THP academy leaders emphasized the need for more intense training in areas such as accident investigations, riot training and officer survival, weighing station operations, and increased firearms training (four weeks).

According to LETA management, new POST rules will restrict the establishment of new outside training academies. Potential academies will be required to show a need—specifically, that they will train a minimum of 100 of their own officers annually, or if they provide training to other agencies, they must have a total immersion resident program. This would require having housing for trainees during the training program. Prior to this rule, the only requirement for establishing a new academy was that the academy had to meet facility, training, and faculty guidelines.

## **THE POST COMMISSION HAS IMPLEMENTED FORMAL POLICIES FOR PROCESSING INCOME SUPPLEMENT REQUESTS, ADDRESSING CONCERNS INITIALLY IDENTIFIED BY AUDITORS**

Auditors' initial review of the Peace Officer Standards and Training (POST) Commission's processing of income supplements for police officers identified several concerns (detailed below). However, as described in the final paragraph of this observation and comment, the commission has now addressed those concerns.

Section 38-8-104(11), *Tennessee Code Annotated*, authorizes the POST Commission to administer income supplements for police officers. For the calendar year ending December 31, 2005 (our period of review), the POST Commission paid \$6,119,622.60 to law enforcement agencies in income supplements for 11,798 police officers. In some instances, a law enforcement agency received more or less money than it originally requested for its officers. However, because of a lack of written policies and inadequate documentation, auditors were not able to determine why an agency received more or less money than it originally requested.

To be qualified to receive the income supplement (which is in addition to the officer's regular pay), a law enforcement officer must be certified under the Peace Officer Standards and Training Commission and must successfully complete a 40-hour in-service training course approved by the commission. Criteria for eligibility is specified in the *Rules of the Tennessee Peace Officer Standards and Training Commission*. The income supplement is based on the availability of funds approved by the General Assembly. Currently, and for our period of review, the amount of the income supplement is \$518.70 per officer.

Every year, POST Commission staff provide law enforcement agencies with a Salary Supplement Reporting Roster, a Request for Payment form, and instructions for completing the forms. On the Salary Supplement Reporting Roster, the law enforcement agency lists the names of all eligible officers, their POST certification numbers, and their social security numbers. The names of ineligible officers are listed at the end of the roster. The law enforcement agency then submits the completed Salary Supplement Reporting Roster and the Request for Payment to the POST Commission for payment.

Staff of the POST Commission process each Salary Supplement Request received from law enforcement agencies. However, these procedures are not documented. According to POST Commission staff, the files of every eligible officer listed on a roster are reviewed to verify the information provided by the law enforcement agency. Staff also review the files of every ineligible officer to ensure that information is accurate as well. Upon completion of the review, payment is made in lump sum directly to the governmental entity handling salary accounts for the eligible law enforcement agency.

Auditors obtained salary supplement data for the calendar year ending 2005. For that period, 357 law enforcement agencies submitted requests for payment. According to the data, payment was requested for 11,853 police officers, but 11,798 officers actually received supplemental pay. The agencies requested a total amount of \$6,148,151.10, and the POST Commission paid \$6,119,622.60 to the agencies. Further review of the data showed that although the total number of officers paid and the total amount paid was less than what was originally requested, some agencies received more money than actually requested. See table below.

	<b>Payment Discrepancies</b>	
	<b>More Than Requested</b>	<b>Less Than Requested</b>
<b>Number of Agencies</b>	28	72
<b>Number of Officers</b>	49	103
<b>Difference Between Amount Paid and Amount Requested</b>	\$25,056.30	\$53,156.10

Auditors attempted to determine why these agencies received either more or less than the amount originally requested. However, we were unable to make these determinations because of inadequate documentation in agencies' files. As a result, we could not clearly ascertain which officers had been deemed eligible (or ineligible) upon review by POST Commission staff. In addition, specific changes to an agency's request are not communicated to the agency in a letter

detailing these changes. Instead, changes are indicated by notations on the copy of the Salary Supplement Reporting Roster and Payment Request form which is returned to the agency after the request has been processed. To determine which officers have been determined eligible or ineligible by the POST Commission, the agency must compare the roster returned by the POST Commission to the original roster.

The lack of formal policies for processing Salary Supplement Pay Requests and inadequate documentation in agencies' files created the risk that

- The process was not conducted in a consistent manner. This risk was especially high when the POST Commission used officers from law enforcement agencies to assist in processing these requests as it did in years prior to 2006.
- Proper payment to law enforcement agencies could not be verified by independent review.
- POST Commission staff (as well as the officers who have assisted POST Commission staff in processing requests) were not accountable for their work because files did not indicate who conducted the review.
- Law enforcement agencies, especially those with a high number of officers, may have had difficulty interpreting the changes made by POST Commission staff, thus impeding an agency's ability to disburse payments to eligible officers in a timely manner.

We made the following recommendations. The POST Commission should establish written, formal procedures detailing the steps for processing Salary Supplement Pay requests. These procedures should include requirements for documenting changes to a request to ensure an appropriate audit trail. Changes to a request should be communicated to the law enforcement agency in writing, detailing the nature and basis of the changes. POST should provide training on, and a copy of, these procedures to those involved in processing these requests. In addition, the POST Commission should require staff and those assisting in the process to declare in writing any law enforcement agency with which they are currently or have previously been affiliated in order to minimize potential conflicts of interest. Those staff should not be assigned responsibility to review payment requests for agencies with which they are or have been affiliated.

In 2007, the POST Commission began requiring reviewers to use a check-out log to document which reviewers had been involved in these reviews. Effective September 1, 2008, the POST Commission implemented a policy addressing weaknesses in its salary supplement review process. The purpose of the policy is to provide POST Commission staff with a means to review, authenticate, and verify salary supplement rosters for in-service pay. The policy outlines qualifications for receiving pay supplements, provides specific procedures for local agencies to follow when making pay requests, requires POST staff to notify local agencies in writing when a pay discrepancy is determined, and prohibits anyone from reviewing requests of any agency with

which they are currently, or were formerly, employed. These efforts by the POST Commission appear to adequately address weaknesses auditors identified in POST Commission staff's review process.

## **ADEQUACY OF TRAINING FEES**

In response to a prior performance audit, the Law Enforcement Training Academy (LETA) has performed annual fee recovery analysis since fiscal year 2004, to determine if training fees charged are adequate to cover costs. According to LETA management, LETA is not, nor is it intended to be, self-sufficient. The current goal of the agency is to recoup 25 to 33 percent of training costs through fees. Agency management estimated that it is currently collecting approximately 30 percent of costs. Based on auditors' review of LETA's revenue recovery analysis, the academy collected 29.7 percent of its actual training costs in fiscal year 2006 and projected it would collect 29.4 percent in fiscal year 2007 and 28.0 percent in fiscal year 2008. Through the first five months of fiscal year 2008 (through November 2007), the actual revenue recovery was 26.9 percent.

LETA management believes that this percentage is adequate because the training fees are a major cost for local agencies. The average local agency in Tennessee has 15 officers, and management believes that it would be a major undertaking for agencies to totally absorb this cost. As a result, the actual costs are never recovered.

## **UNCERTIFIED OFFICERS**

Management of the Law Enforcement Training Academy (LETA) is very concerned about local law enforcement agencies using non-certified officers and believes that all officers should be certified before beginning work. Current legislation in Tennessee allows officers to work on the streets for one year prior to completing training and being certified. The Peace Officer Standards and Training (POST) Commission, however, established a standard of six months in 2003. According to LETA management, this issue involves only local law-enforcement jurisdictions; the Tennessee Highway Patrol will not allow officers on the road before they are POST-certified. POST Commission rules do require that full-time non-certified officers be accompanied by a certified officer while on patrol. This rule also applies to part-time, temporary, or reserve officers.

Although unable to provide documentation, LETA management believes that Tennessee leads all southeastern states in the numbers of lawsuits filed against jurisdictions because of the actions of non-certified officers. Auditors were unable to obtain any documentation to support this. A national law enforcement accreditation agency, however, has an established standard that all officers should complete training prior to possessing the authority to carry a weapon or make an arrest. In addition, the Tennessee Municipal League's (TML) Risk Management Pool is a strong advocate against the use of non-certified officers and has established guidelines outlining its position.

Auditors contacted the following law enforcement research advocacy groups to obtain information concerning the use of non-certified officers: the Police Executive Research Forum (PERF); the Public Agency Training Council (PATC); the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA); and the International Association of Directors of Law Enforcement Standards and Training (IADLEST). Auditors interviewed representatives from these groups to determine if any had conducted research to determine the numbers of lawsuits filed, along with associated costs, against local jurisdictions because of the actions of non-certified officers. Also, auditors wanted to determine if these groups have taken any position on the use of non-certified officers.

None of the groups had conducted research to collect data on lawsuits, and some questioned whether accurate data could be compiled. A representative from IADLEST believed that it would be difficult to compile accurate data because a large number of complaints or lawsuits are settled by jurisdictions before they come to court, and these totals would not be included in any lawsuit data compiled.

While no financial data has been compiled, representatives from all the groups were aware of the issue and expressed concerns with the practice of placing officers on the street before they have completed training and certification. Representatives of the groups were primarily concerned with the potential financial risks.

The Commission on Accreditation for Law Enforcement Agencies, Inc., (CALEA) has established a standard on the certification of officers. CALEA was created in 1979 as a credentialing authority through the joint efforts of law enforcement's major executive associations:

- International Association of Chiefs of Police (IACP);
- National Organization of Black Law Enforcement Executives (NOBLE);
- National Sheriffs' Association (NSA); and
- Police Executive Research Forum (PERF).

The purpose of CALEA's accreditation program is to improve the delivery of public safety services, primarily by maintaining a body of standards, developed by public safety practitioners, covering a wide range of up-to-date public safety initiatives; establishing and administering an accreditation process; and recognizing professional excellence. LETA and the Tennessee Department of Safety are currently CALEA-certified agencies.

CALEA's standard requires that all sworn officers complete a recruit training program prior to assignment in any capacity in which the officer is allowed to carry a weapon or is in a position to make an arrest, except as part of a formal field training program required by standards. Furthermore, the intent of this standard is to preclude assigning persons to positions requiring the carrying of a weapon, enforcing the law, or making arrests until they successfully complete a structured basic training course. Those persons who have been hired but who have not yet completed the basic training course could be used in such positions as communications,

records, or other activities not requiring the carrying of a weapon, enforcing the law, or making an arrest.

Auditors also contacted management of TML's Risk Management Pool to determine TML's position on the use of non-certified officers. The TML is a voluntary association of paying municipalities who use TML as a source for a wide range of policy issues. The pool was created in 1979 to provide insurance because private insurance premiums for municipalities had become unreasonable. Although it excludes the four largest municipalities in Tennessee (Memphis, Nashville, Chattanooga, and Knoxville), which use a self-insurance process, TML's Risk Management Pool includes 90 to 95 percent of Tennessee municipalities.

TML management also believes that the use of uncertified officers is a very serious issue because it creates a great liability risk to both the municipality and the individual officers. TML has been working for years to convince local law enforcement agencies that it is not in their best interest to use non-certified officers on the street. TML management believes that it is difficult for a municipality to defend a lawsuit involving a part-time and/or non-certified officer when that officer has not received adequate training. Although unable to provide documentation to support the position, TML management believes the use of non-certified officers by police departments in the state is widespread.

TML has established Risk Management Pool guidelines that outline TML's position on this issue. Entitled *Use of Part-Time/Temporary/Reserve/Auxiliary Police Officers*, the document provides specific recommendations to municipalities with regard to non-certified officers. According to the document, police departments that fail to provide adequate policy and control over their officers "are exposing themselves to tremendous potential liability." It follows that "the critical safety and liability risk arises when you grant police powers to an uncertified member of the general public, give them the authority to act under color of law given them by the city government, and then expect them to provide the same level of police services as a certified officer would provide." The document emphasizes that "it is critical that the definition of an auxiliary police officer makes it clear that the purpose of this classification of officer is to support the full-time officer." Furthermore, the document cites Title 42 U.S.C. Section 1983, which "grants an avenue of suit in federal court to those who allege their rights have been violated by a person who acts under the color of law granted them by the government entity."

The document also addresses the risk inherent to the personal safety of uncertified officers who are put on the street by agencies. Further, the document referred to a videotape the TML Pool mailed in January 1992 to every police department in Tennessee that was participating in either workers' compensation or liability coverage, or both. The tape, "Command Update Special: Murder on Tape," was produced by the Law Enforcement Television Network (LETN). A message from the tape is that "in many cases in law enforcement, uncertified officers may not be mentally or physically prepared for dealing effectively with high-risk incidents alone."

The TML document provides eight recommendations that municipalities should implement to reduce the potential for accidents and/or financial loss. The recommendations include a statement that all auxiliary officers must meet all criteria outlined in the *POST Commission Rules*, Chapter 8, rules 1110-08-01 through 1110-08-06, and that no auxiliary police officer should be authorized to perform regular patrol functions alone or carry a weapon unless the auxiliary officer has received the same training as a full-time certified officer performing the same function.

## **CONSTABLES IN TENNESSEE**

Constables in Tennessee are not certified by the Peace Officer Standards and Training (POST) Commission and with the exception of 40-hour in-service training upon election to office, are not required to attend periodic, formal law enforcement training. The primary parties in any move to require certification have differing opinions on the role of constables and the methods of training and certification that should be mandatory. While the Tennessee Constable Council (TCC), a constable advocacy group, supports the certification and training of constables, it opposes the POST Commission and LETA recommendation that they complete the same basic training as all law enforcement officers.

While many local legislative bodies in Tennessee have done away with constables, they still exist, and according to TCC management, as of May 2007, there are currently 410 elected constables in 57 counties statewide. Constables are elected and are one of the oldest forms of law enforcement in the United States. Constables are part-time officers whose authorities vary. In general, they have basic law enforcement powers, in that they can arrest individuals and carry a weapon. One of the constables' primary roles is serving court documents, including warrants.

In some states like Texas and Kentucky, constables are certified officers. That is not the case in Tennessee, however. Sections 8-10-202 and 8-10-203, *Tennessee Code Annotated*, require that all constables complete a 40-hour in-service training course and must be firearms qualified within 12 months of being elected. After that, however, no formal training is required. While the TCC and the Tennessee Constables Association (TCA) provide the initial in-service training, there is no oversight to ensure that constables electing to train with local law enforcement agencies actually receive the training. There is no funding source in this state to train or equip constables, who must purchase their own vehicles and any other equipment they use, including radios and weapons.

While constables in Tennessee at one time were considered a very highly regarded law enforcement officer, according to POST Commission/Law Enforcement Training Academy (LETA) management, some local law enforcement officials believe they may be a hindrance. Management believes that some counties' decision to continue to use constables may be based primarily on tradition. The POST Commission has been dealing with issues regarding constables for several years. According to management, however, no legislation has been proposed that would require constables in Tennessee to be POST-certified.

Because constables are not regulated, POST Commission/LETA management believes that counties that choose to use constables open themselves up to potentially massive liabilities. State Attorney General Opinion No. 00-050, dated March 20, 2000, concludes that “a county would probably be liable for torts committed by a constable that fall within the Governmental Tort Liability Act . . . and for civil rights violations under 42 U.S.C. 1983.”

The POST/LETA opinion of the role and importance of constables in Tennessee is not shared by one of the profession’s leading advocacy groups, the Tennessee Constable Council (TCC). The TCC was created in 2003 as a proactive agency with the primary goal of training all constables and thereby taking them to a new, more professional level. TCC management believes constables serve an important role, especially in rural areas where the sheriff departments may not have a significant presence. TCC management emphasized that while constables, on a daily basis, are not on the front lines, their role is essential in some areas. Because constables do not respond to calls like sheriff deputies, they are free to spend more time on patrol in areas where problems might occur. In some counties, like the TCC president’s home county of Fentress, constables reportedly serve about 90 percent of court papers (i.e., civil processes, garnishments, bank levies, detainers, and summons). According to TCC management, the court system relies extensively on the constables. In his county, he says the TCC has worked to make the constable system work. As a result, Fentress County has passed a resolution that pays for its constables’ fuel costs if they complete 40 training hours annually.

To promote standardization and improve the professional nature of the position, the TCC supports legislation that would require training and certification for all constables. The TCC currently oversees three training schools in Tennessee, in Roane, Sevier, and Warren counties. Each of the three schools annually graduates two classes of about 30 constables, for a total of about 180 constables each year. The schools provide a 40-hour in-service training that covers issues related to the role of a constable. For example, according to TCC management, the schools provide the same Emergency Vehicle Operation Course required by law and provided in POST training. Other POST-similar courses are modified to meet the needs of constables. The constable training instructors are all POST-certified, and also provide some training for sheriff and police departments in the state. The TCC provides constables with IDs and patches.

The 180 constables who receive annual training, however, represent less than half of all constables in the state. The TCC supports required annual training for all constables, but it lacks the authority to require it. While the TCC trains constables, neither the agency nor the training is recognized by the POST Commission. The TCC proposes that it be allowed to continue to train constables in a 380-hour POST-approved course, and then have officers take the same POST Commission test as all officers before receiving POST Commission certification. The POST Commission would maintain all records of training as it does with all POST-certified officers. TCC management believes the TCC could train constables in a cost-efficient manner.

According to TCC management, the POST Commission was willing to work with the TCC in support of the Constables Accountability Act of 2006. However, the POST Commission insisted that as a requirement for certification, constables complete the same basic training as POST-certified officers. TCC management does not believe that basic training is necessary for

constables. In addition, because constable is a part-time position and constables typically work other jobs, constables would be unable to commit to the ten weeks required for attending basic training.

On the other hand, TCC management believes that required standardized statewide training for constables is necessary to professionalize the position. TCC management emphasized that many constables are retired law enforcement officers, some even being former FBI agents. Others however, according to management, are individuals who merely want the right to carry a gun and refuse to even consider training.

While constables are state officers, they are elected locally, and legislation is written so that counties may decide to maintain or eliminate the position. The county commissions in Tennessee can decide to abolish the use of constables in their respective jurisdictions, and then submit that information to the General Assembly, which will then pass necessary legislation to effect that change.

## **MONITORING LOCAL LAW ENFORCEMENT AGENCIES**

The Peace Officer Standards and Training (POST) Commission staff's efforts to monitor local law enforcement agencies have improved since 2007. Reviews of these local agencies are conducted to compare personnel files to actual training records, and also to pay supplements to verify training for POST Commission compliance and to ensure officers have met the criteria to receive the annual pay supplements that the agencies request. (In calendar year 2005, approximately 360 law enforcement agencies submitted requests for payment of income supplements for officers.) The ability of the POST Commission to monitor these agencies appears to have improved with the hiring of three investigators in the latter part of 2006 and early 2007. The agency's earlier monitoring efforts were inconsistent (see table below), and staff was not routinely following up on the reviews to determine if the local agencies had taken actions to correct problems identified.

<b>Calendar Year</b>	<b>Reviews/ Investigations</b>
2001	1
2002	0
2003	8
2004	11
2005	31
2006	6
2007	10

The new investigators began conducting reviews in 2007, and half of the reviews (five of ten) during that year were random reviews. The other five were the result of a complaint or news report, a request from a local official, or earlier monitoring by Law Enforcement Training Academy (LETA) staff. In addition, seven of the ten reviews found that follow-up action was necessary, and in six of the instances the investigators returned to the agency to determine if

appropriate actions had been taken. The remaining review called for a follow-up within 45-60 days. After four months, however, no follow-up had been conducted. LETA management believes the hiring of the investigators will allow staff to conduct random reviews of all local agencies on a periodic basis.

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## RECOMMENDATIONS

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### ADMINISTRATIVE

The Peace Officer Standards and Training (POST) Commission and the Law Enforcement Training Academy (LETA) should address the following areas to improve the efficiency and effectiveness of their operations.

1. The POST Commission should require that all academies submit annual reports as required and follow up the reports with routine on-site reviews to ensure all academies adhere to POST Commission requirements.
2. The POST Commission/LETA management should continue efforts to implement electronic maintenance of records and files. In the interim, management should consider what steps staff might take (e.g., removing files of deceased or inactive officers) to improve the existing record-keeping system.
3. The POST Commission should consider adopting a mandatory attendance requirement to ensure the presence of commission members at meetings. The commission should then notify the appointing authorities if their appointees fail to meet those meeting requirements. The POST Commission should consider establishing bylaws to govern the procedural aspects of commission meetings. Commission staff should record attendance (or absence) of all members at each meeting.

**Appendix  
Title VI Information**

Title VI of the Civil Rights Act of 1964, requires that “no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance.” In response to a request from members of the Government Operations Committee, we compiled information concerning the Peace Officer Standards and Training (POST) Commission’s and the Law Enforcement Training Academy’s (LETA’s) efforts to comply with Title VI requirements.

During fiscal year 2007, LETA was awarded two federal grants: a \$105,390 Bryne Grant (through the Department of Finance and Administration’s Office of Criminal Justice Programs) for a subgrant to the Tennessee Association of Chiefs of Police (TACP) to fund training efforts; and a \$25,000 Homeland Security Grant (through the state Office of Homeland Security) to fund audio-visual equipment to be used in training. In fiscal year 2008, LETA was awarded a continuation of the Bryne TACP grant for \$105,390, as well as a \$116,750 grant for the purchase and installation of a driving simulator.

According to LETA management, the academy has never developed its own Title VI plan, nor is it required to do so. When the agency was organizationally structured under the Department of Safety, the agency’s Title VI efforts were included in that department’s plan. The academy is now included in the Title VI plan of the Department of Commerce and Insurance, to which the academy is now administratively attached. Neither LETA nor the Department of Commerce and Insurance was able to provide specifics regarding actions taken to monitor Title VI activities. LETA management does meet with department staff annually to discuss Title VI issues. (More detailed information regarding the Department of Commerce and Insurance’s Title VI plan and monitoring activities will be included in the performance audit of the Department of Commerce and Insurance, currently being conducted.) According to LETA’s director, no Title VI complaint has been filed against LETA or the POST Commission during his tenure. Any such complaints would be forwarded to the department’s Title VI Coordinator for investigation.

See the tables below for a breakdown of POST Commission members by gender and ethnicity and a breakdown of POST Commission and LETA staff by job title, gender, and ethnicity, as of September 2007.

**POST Commission Members by Gender and Ethnicity  
As of September 2007**

	<b>Gender</b>		<b>Ethnicity</b>		
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>	<i>Hispanic</i>
POST Commission Members	14	4	14	3	1
<b>Percent</b>	<b>78%</b>	<b>22%</b>	<b>77.8%</b>	<b>16.7%</b>	<b>5.5%</b>

**POST Commission Staff by Job Title, Gender, and Ethnicity  
As of September 2007**

<b>Title</b>	<b>Gender</b>		<b>Ethnicity</b>	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Administrative Secretary	0	1	1	0
Administrative Services Assistant 1	0	1	1	0
Administrative Services Assistant 2	0	1	1	0
Investigator	2	1	3	0
<b>Total</b>	<b>2</b>	<b>4</b>	<b>6</b>	<b>0</b>
<b>Percent</b>	<b>33%</b>	<b>67%</b>	<b>100%</b>	<b>0%</b>

**LETA Staff by Job Title, Gender, and Ethnicity  
As of September 2007**

<b>Title</b>	<b>Gender</b>		<b>Ethnicity</b>	
	<i>Male</i>	<i>Female</i>	<i>White</i>	<i>Black</i>
Accountant 3	1	0	1	0
Administrative Assistant 1	0	2	2	0
Administrative Secretary	0	1	1	0
Administrative Services Assistant 2	0	2	2	0
Assistant Director	1	0	1	0
Cook 1	0	2	1	1
Dietitian	0	1	0	1
Director	1	0	1	0
Food Service Worker	1	0	0	1
Instructor	8	1	9	0
Psychologist	1	0	1	0
Security Guard	1	0	1	0
Supervisor	1	1	0	2
<b>Total</b>	<b>15</b>	<b>10</b>	<b>20</b>	<b>5</b>
<b>Percent</b>	<b>60%</b>	<b>40%</b>	<b>80%</b>	<b>20%</b>