CITY OF CHARLOTTE.

CMPD Recruiting

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CMPD Recruiting Executive Summary

Objective

The objective of this audit is to determine if CMPD has the systems and processes in place to optimize recruitment goals.

Background

The CMPD Recruiting Division seeks to onboard as many qualified police trainees as possible.

CMPD works to achieve this goal through in-person events, traditional advertising (ex. Billboards/bus wraps), online advertising, and through media coverage.

CMPD's Recruiting Division had a FY 2024 budget of $2.8 million. This represents 0.8% of the $334.9 million CMPD budget for FY 2024.

Conclusion

While CMPD has made significant strides to increase their police force, changes to their internal policies and procedures can further bolster these efforts.

Highlights

1. *CMPD can expand the applicant pool by modifying the existing residency requirements.*

   - CMPD should study the impacts of modifying their residency requirements by expanding the mileage limit and/or increasing the number of reference points for the limit.

2. *A survey of police trainee voluntary withdrawals identified gaps in applicant tracking and communication.*

   - There is an existing issue where not all CMPD applicants are receiving automated emails.
   - CMPD should formalize expectations for tracking and following up on applicants.

3. *Opportunities exist to increase inclusivity in CMPD demographics.*

   - CMPD should reach out to the identified police departments to determine if those police departments are utilizing specific strategies to reach targeted demographics.

Actions Planned

CMPD has accepted all recommendations and are working to implement corrective actions in a timely manner.

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Objective

This audit was conducted to determine if the Charlotte Mecklenburg Police Department (CMPD) has the systems and processes in place to optimize recruitment goals.

Background

This audit originated from a request by the Police Chief for Internal Audit to conduct an audit of CMPD's hiring standards to determine if there were opportunities to attract more applicants by changing policies/standards.

In general, the recruitment to hiring process is as follows:
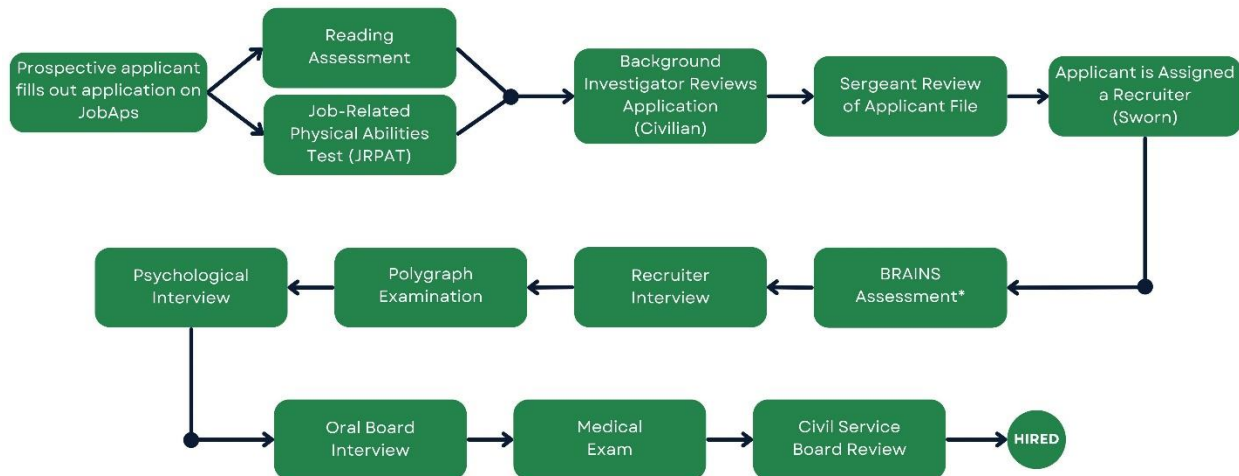
*The Biographical Risks And INconsistencieS (BRAINS) assessment covers a variety of topics from personal history, criminality, substance abuse, integrity, and employment history.

The initial audit scope compared CMPD's standards with the State's standards. We noted that CMPD had more stringent standards in several areas. During the audit, CMPD changed several recruiting policies and reported setting new records for academy class sizes. Per CMPD, the most recent academy class, beginning February 2024, started with 85 police trainees. Of those 85 trainees, 59 currently remain in the academy. Historically, CMPD has processed three applicant classes each calendar year. The Recruiting Division is projecting four classes in 2024, indicating progress likely driven by standard changes.

Some of the recent changes made to CMPD's standards are:

Facial hair - CMPD's grooming standards have been updated to allow neatly groomed and maintained mustaches, goatees, and beards for all employees.

Tattoo policy – Officers can now have visible tattoos, brands, or scarification provided they do not violate the conditions outlined in CMPD's grooming standards.

JRPAT – CMPD no longer disqualifies applicants for failing the JRPAT. Instead, the applicant moves along with the application process and is coached so they can work towards passing the test during their time in the academy.

Nelson-Denny Reading Test – Previous applicants were disqualified after two failed tests. Applicants can now take the test as many times as needed. CMPD has also removed the 30-day waiting period for retaking a failed test.

Drug history – CMPD has reduced the cooldown period for schedule 1 drugs from ten years to three years. Schedule I drugs, substances, or chemicals are defined as drugs with no currently accepted medical use and a high potential for abuse. This change in policy still aligns with State standards.

The recruiting division consists of a major, a captain, a lieutenant, a sergeant, and 12 to 13 sworn recruiters. The division also staffs three civilians responsible for performing initial background checks, one full time polygraph examiner, one contracted polygraph examiner, one office administrator, and one office assistant.

Scope, Methodology, and Compliance

Scope

CMPD applicants from March 2020 through February 2024.

Methodology

To achieve the audit objectives, auditors performed the following:

- Interviewed CMPD staff.
- Reviewed NC Criminal Justice Standards, CMPD minimum qualifications/requirements, Civil Service Board meeting documentation, JobAps data, and PeopleSoft data.
- Gained an understanding of the risks and controls related to the hiring process.
- Surveyed current and former applicants.
- Reviewed applicant files
- Designed tests to identify gaps in representation.

JobAps and PeopleSoft are the cloud-based systems that CMPD uses to manage human resource functions. Auditors assessed the reliability of JobAps data by performing tests of disqualification disposition codes. Auditors determined that the disqualification code data was reliable. While

reviewing applicant profiles, auditors determined that applicant status, identified by disposition code, was not always accurate for non-disqualification codes. This is discussed in Finding 2.

Auditors assessed the reliability of PeopleSoft data by (1) performing tests of data, (2) reviewing existing information about the data and the system that produced them, and (3) interviewing staff knowledgeable about the data. Auditors determined that the PeopleSoft data was sufficiently reliable for the purposes of this audit.

A sample of 136 disqualifications in JobAps were judgmentally selected to determine if disqualifications were supported by documentation. No significant exceptions were identified.

A sample of nine employees was judgmentally selected from PeopleSoft to determine if the data was entered correctly. No exceptions were identified.

Compliance

We conducted this performance 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 our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Government auditing standards require that we determine which internal controls are material to the audit objective(s) and obtain an understanding of those controls. To evaluate internal controls, the City Auditor's Office follows the Committee of Sponsoring Organizations of the Treadway Commission's Internal Control – Integrated Framework (COSO Framework) as included in Standards for Internal Control in the Federal Government (GAO Green Book).

In planning and performing the audit, auditors obtained an understanding of the processes used in the CMPD recruitment process and the associated internal controls, assessed the internal control risks, and determined the following internal control components were significant:

- Control Environment – The set of standards, processes, and structures that provide the basis for carrying out internal control across the organization.
- Control Activities – The actions management establishes through policies and procedures to achieve objectives and respond to risks.
- Information & Communication – The quality of information which management and personnel communicate and use to support the internal control system.

Internal control deficiencies that are significant within the context of this audit's objective(s) are stated in the Findings and Recommendations section of this report. For additional information regarding internal control components and the related principles of internal control, please see **Appendix A**.

Findings and Recommendations

1. CMPD can expand the applicant pool by modifying the existing residency requirements.

CMPD's qualifications for the police officer position includes a residency requirement. Police officers must reside within a 45-mile radius of CMPD Headquarters (601 E Trade St, Charlotte, NC 28202). Per CMPD, the 45-mile radius was established by prior administrations to keep police officers close to the city in the event of an emergency situation. Adjusting the existing residency requirements could increase the number of potential recruits while keeping potential on-call response times reasonable.

The 45-mile radius of CMPD Headquarters covers approximately 6,350 square miles. Auditors performed an analysis to determine the potential benefits of modifying/increasing the limit to be 45 miles from any of the 14 CMPD Division Headquarters. A change in reference points would correspond to approximately 8,650 square miles, an increase in coverage of approximately 2,300 square miles (See Figure 1). This new coverage would include Gaffney, Mocksville, and Wadesboro. Based on census data, there are approximately 12,700 people aged 18 to 65 living in these three locations. *Note: CMPD requires applicants to be at least 20 years old at the time of initial application.*

Figure 1: Changing Reference Points
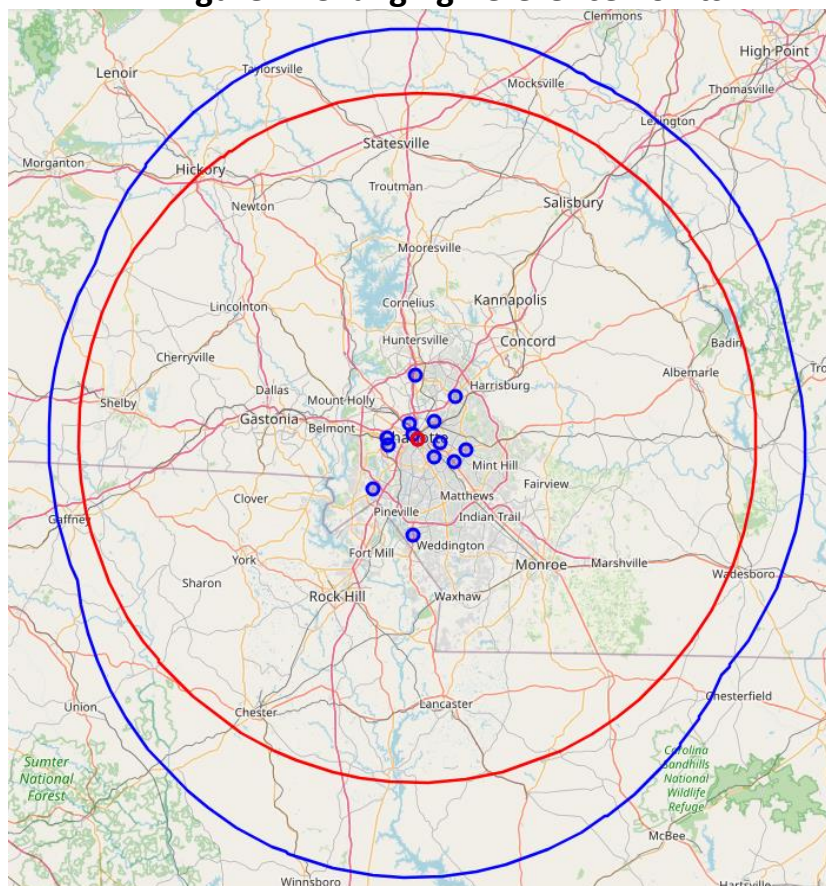
Auditors also performed an analysis to determine the potential benefits of modifying the 45-mile residency requirement. Expanding the parameter to a 75-mile radius would increase CMPD coverage by approximately 11,300 square miles, totaling approximately 17,670 square miles (See Figure 2).

This new coverage map would include Winston-Salem, High Point, Hickory, Spartanburg, Asheboro, and Lenoir. Based on census data, there are approximately 273,400 people aged 18 to 65 living in these three locations. *Note: CMPD requires applicants to be at least 20 years old at the time of initial application.* Additionally, drive times from these areas to CMPD Headquarters would be between an hour and an hour and a half.

Figure 2: Expanding Mileage Limit
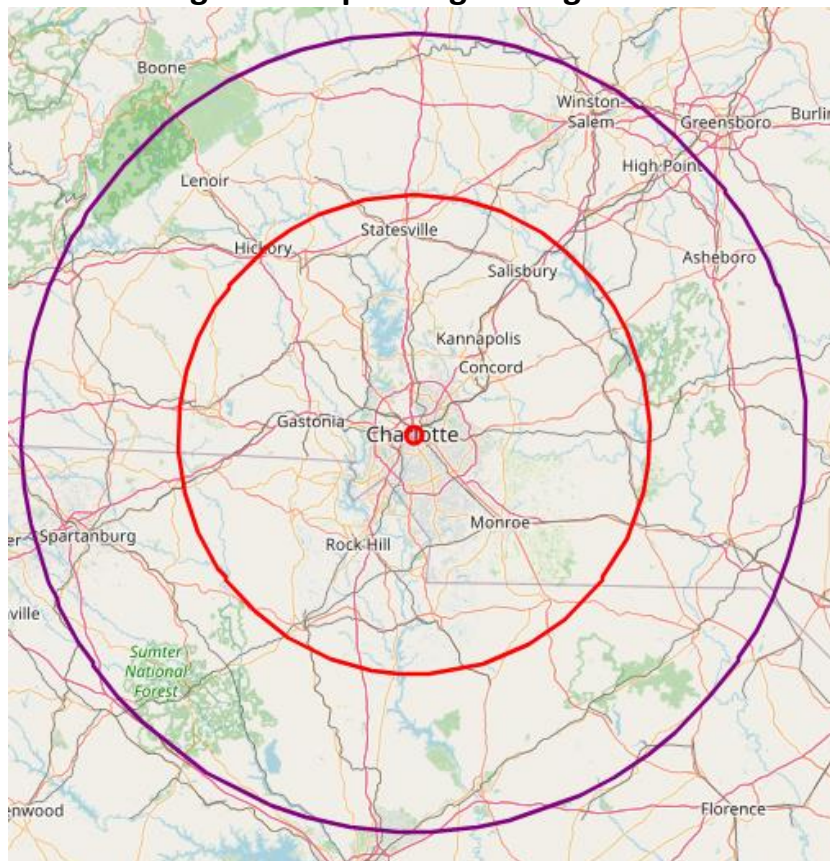
Recommendation 1: CMPD should study the impacts of modifying their residency requirements by expanding the mileage limit and/or increasing the number of reference points for the limit.

Value Added: Effectiveness

CMPD Response: Agree. To facilitate immediate responses and access to necessary equipment, CMPD has a long-standing policy of requiring sworn officers to reside in Mecklenburg County and North Carolina counties contiguous with Mecklenburg County within the forty-five (45) mile radius residency requirement. CMPD will consider performing a feasibility analysis regarding an increase in mileage and the corresponding change in commute times.

2. *A survey of police trainee voluntary withdrawals identified gaps in applicant tracking and communication.*

Since 2020, CMPD has utilized JobAps to manage their hiring process. Among other uses, JobAps allows CMPD's recruiting staff to send automated emails to applicants, upload relevant documentation to the applicant's file, and assign disposition codes to applicants to track their status. Auditors obtained JobAps data for all CMPD applicants for the Police Trainee position for the audit period. We filtered these applicants by their most recent disposition code, and that disposition code's date, to create a list of 1) applicants that appeared to have explicitly, voluntarily withdrawn from consideration, and 2) applicants that had not had a progression in their application status for three months. The length of three months was chosen through auditor's discretion. This amounted to 4,554 applicants.

Auditors surveyed these applicants to get their feedback on the application process. Of the 258 responses, 77 applicants (30% of responses) said that they were either not contacted or were still awaiting responses or updates from CMPD recruiting staff. CMPD Recruiting staff indicated that they were aware of an existing issue with applicants not receiving emails from JobAps, particularly Gmail users. Auditors noted that 54 respondents (70% of the 77) had the Gmail email domain. CMPD's Standard Operating Procedures (SOP) for recruitment lists the responsibilities for the recruiters, but it does not detail overall process controls (e.g. listing step by step actions to take). Including these details in the SOPs will help promote consistency and limit errors.

During this test, auditors also noted inconsistencies in JobAps data. Specifically, there were instances where JobAps data did not have all of an applicant's history tracked. For example, auditors noted two surveyed applicants had been hired by CMPD, but their applicant profiles showed that they were still in the "Schedule for Written Exam" stage. Additionally, applicants alleged that they had been disqualified but auditors found that they were still marked as active in JobAps. These data inconsistencies can cause confusion for both recruiting staff and applicants. Notifications could be missed, delayed, or not sent altogether, which can result in the loss of applicants.

Recommendation 2A: CMPD should determine the cause of the JobAps notification issue and work with the necessary support departments to resolve it.

Value Added: Efficiency, Risk Reduction

CMPD Response: Agree. After discovering the issue with Gmail account notifications in 2022, CMPD Recruiting Division implemented a plan to address the issue with an internal review, starting with applicants in the hiring process beyond step 1 (City application) and step 2 (Multiple Choice Test). These applicants were contacted and, to mitigate the issue, Recruitment staff attempted contact with the remaining applicants. Moving forward, CMPD launched an internal process with administrative support staff to monitor accounts and are proposing taking the vacant civilian allocation to make an administrative assistant to the Sergeant's position. In addition to other duties, this position would allow for periodic, internal reviews of applicants. One positive issue is the sunsetting of the JobAps system as the City of Charlotte transitions to Workday Solutions for applicant tracking in 2024-2025, which will also alleviate an issue.

Recommendation 2B: CMPD should perform periodic reviews of JobAps to 1) identify applications that have stagnated, and 2) contact those applicants to ensure they have received JobAps communications regarding the status of their application and the next steps of the process.

> *Value Added:* Efficiency

CMPD Response: Agree. CMPD Recruiting Division performs internal reviews of JobAps to evaluate the pool of applicants in the hiring process; however, there is room to formalize a job task for performing internal reviews of the JobAps system. Luckily, the sunsetting of this applicant tracking system will be replaced by Workday Solutions in 2025-2026. In the meantime, it will be required to perform this task in a more formal manner from administrative support staff, complete with monthly reporting to the recruiting Sergeant.

Recommendation 2C: CMPD should revise existing standard operating procedures to establish expectations for tracking applicant status and following up with applicants. Quarterly, on a sample basis, recruitment command staff should ensure that these procedures are being followed.

> *Value Added:* Efficiency, Risk Reduction

CMPD Response: Agree. CMPD Recruiting Division does go back periodically throughout the calendar year to identify any applicant that has not responded to email and/or phone correspondence. However, with the current administrative support staff that is in place (Administrative Officer II and Office Assistant IV positions), it will be a job function to maintain a database of applicants who are not progressing through the hiring process. A back-up option would also be to utilize the three (3) Civilian Background Investigations team to perform this task.

3. CMPD demographics: Identifying opportunities for increasing inclusivity.

CMPD utilizes two components for tracking demographics: ethnicity and gender[1]. Auditors collected the most recent census demographic data (2022) from 11 cities and one county, as well as 2023 demographic data for the respective police departments in those locations. We performed a benchmarking analysis to identify any demographic disparities using this data.

For the charts below, a value of 100% would indicate that the demographic is proportionally represented accurately between the police department and the locale. Values below 100% indicate underrepresentation and values over 100% indicate overrepresentation.

> Internal Audit recognizes the complex nature of appealing to specific demographic groups and that CMPD is aware of the disproportional representation of demographic groups both nationwide and within the city. This section is intended to provide CMPD with potential resources for identifying ways to attract and employ a more representative workforce.

Comparing police departments to their true population demographics

CMPD differs from Charlotte's population for the Black ethnicity. Specifically, the Black ethnicity is underrepresented by 18% (See Figure 3). As indicated below, the police departments in San Francisco, Denver, Jacksonville, Fairfax County, and Asheville have the closest percentages to their locations' population of Black residents and are potential resources for information that could be used to improve representation of Black officers at CMPD.

| CMPD Breakdown (Ethnicity)	
American Indian	0.6%
Asian	2.7%
Black	17.2%
Hispanic	6.18%
Multiple	1.8%
White	70.7%

Figure 3: Proportional Representation in Police Departments
(Black Ethnicity)
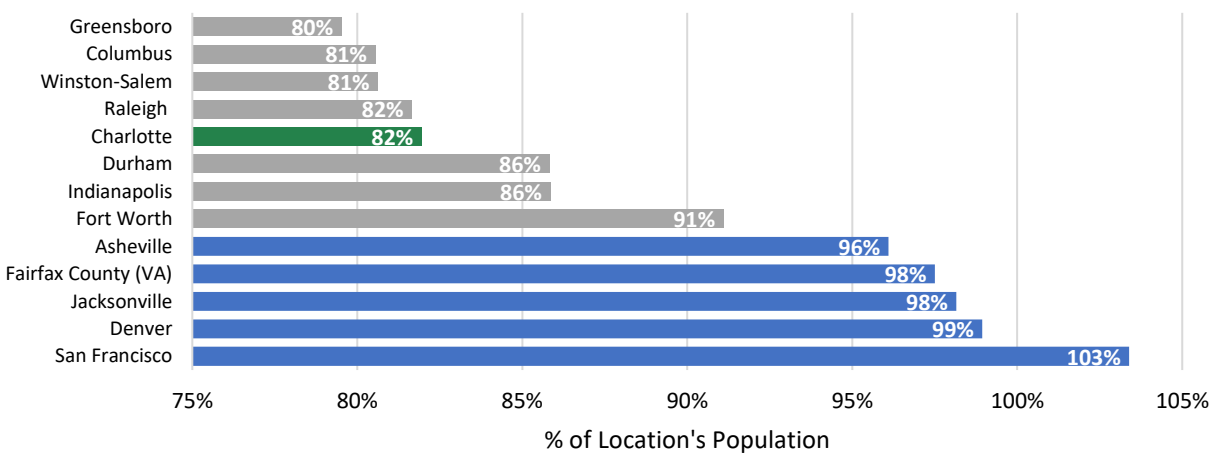
[1] The City's HR system allows self-identification (male, female, non-binary, or unspecified) however, gender is currently reported in binary sex terms (male/female). Our benchmarking cities also use these binary options for gender reporting. While the City of Charlotte recognizes that gender is not binary, for consistency in this report, we will use gender terms and ethnicity categories aligned with our benchmarked cities.

CMPD differs from Charlotte's population for the Hispanic ethnicity. Specifically, the Hispanic ethnicity is underrepresented by 8.8% (See Figure 4). As indicated below, the police departments in San Francisco, Asheville, Greensboro, Jacksonville, Columbus, and Raleigh have the closest percentages to their locations' population of Hispanic residents and are potential resources for information that could be used to improve representation of Hispanic officers at CMPD.

**Figure 4: Proportional Representation in Police Departments
(Hispanic Ethnicity)**
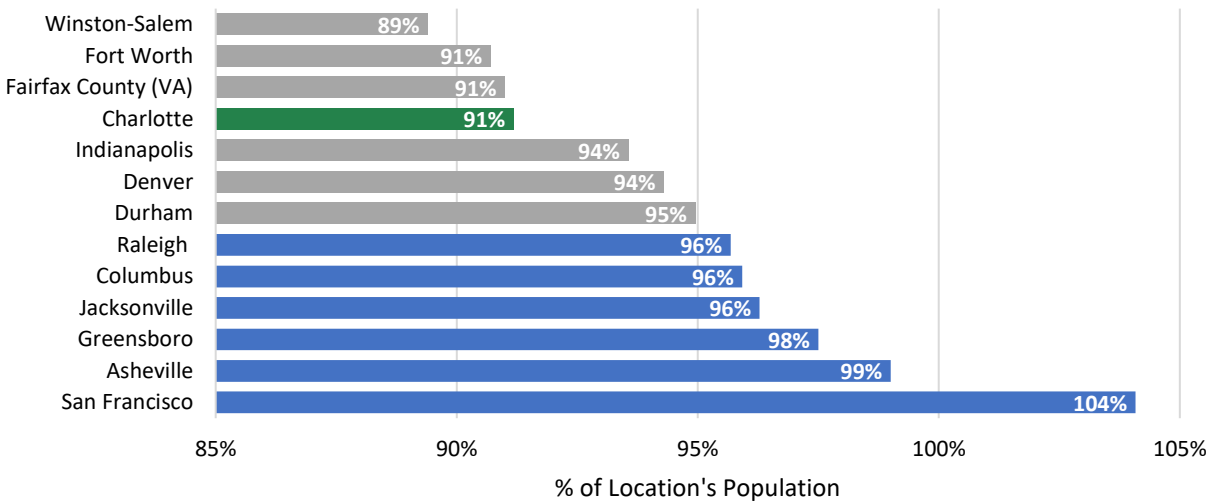
CMPD's gender representation does not align with the broader demographic composition of Charlotte. Specifically, females are underrepresented by 37.3% when compared to Charlotte's population (See Figure 5). We have identified Jacksonville and Asheville as potential resources for learning how to reduce this demographic disparity.

**Figure 5: Proportional Representation in Police Departments
(Female)**
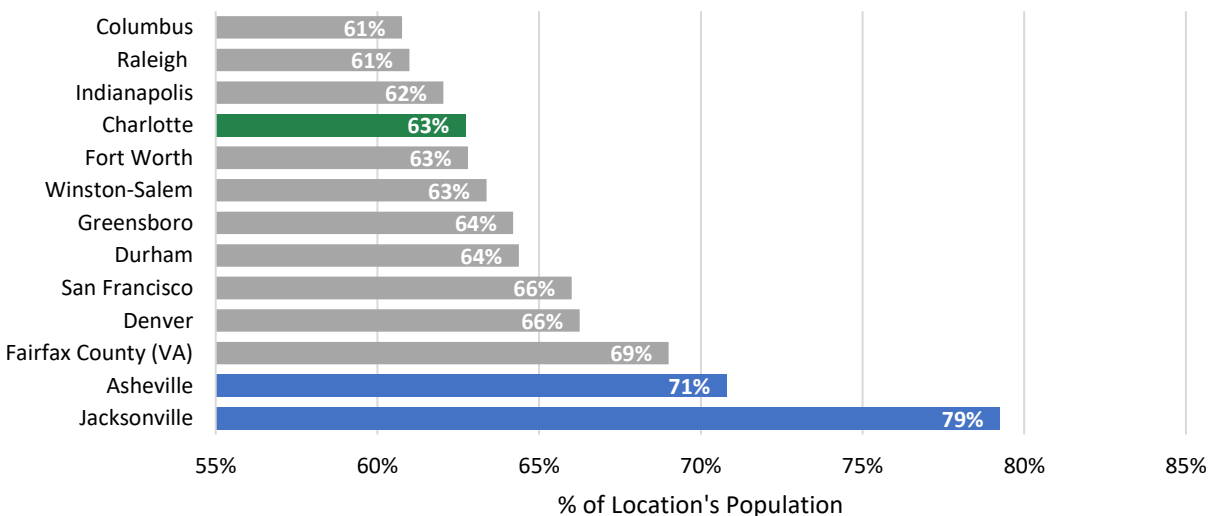
Diverse representation within law enforcement fosters cultural competency and sensitivity, reducing misunderstandings and biases during interactions with residents. Strengthening inclusive recruitment practices help to mitigate stereotypes and biases, promoting fair treatment and enhancing overall public trust in law enforcement.

> *Recommendation 3:* CMPD should reach out to these police departments to determine if there are specific strategies utilized by their police departments to reach the demographics where CMPD has a disparity.
>
> *Value Added:* Efficiency, Equity

CMPD Response: Agree. This demographic information is helpful to know how our fellow law enforcement agencies are performing to fill their ranks with officer demographics to better reflect the communities they serve. The Recruitment Lieutenant is responsible for formulating and proposing a recruiting strategy; therefore, this position will be responsible for reaching out to the various law enforcement agencies on this report and open dialogue on strategies for attracting women and minority candidates. The Recruiting Lieutenant will then prepare a detailed response to their chain of command in the hopes that new strategies will be gained to recruit the best applicants within the coming years. This is expected to be completed by the end of 2024.

Conclusion

While CMPD has made significant strides to increase their police force, changes to their internal policies and procedures can further bolster these efforts.

Distribution of Report

This report is intended for the use of the City Manager's Office, City Council, CMPD. Following issuance, audit reports are sent to City Council and subsequently posted to the Internal Audit website.

CITY OF CHARLOTTE

Appendix A
The Five Components and 17 Principles of Internal Control

Control Environment	1. The oversight body and management should demonstrate a commitment to integrity and ethical values. 2. The oversight body should oversee the entity's internal control system. 3. Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity's objectives. 4. Management should demonstrate a commitment to recruit, develop, and retain competent individuals. 5. Management should evaluate performance and hold individuals accountable for their internal control responsibilities.
Risk Assessment	6. Management should define objectives clearly to enable the identification of risks and define risk tolerances. 7. Management should identify, analyze, and respond to risks related to achieving the defined objectives. 8. Management should consider the potential for fraud when identifying, analyzing, and responding to risks. 9. Management should identify, analyze, and respond to significant changes that could impact the internal control system.
Control Activities	10. Management should design control activities to achieve objectives and respond to risks. 11. Management should design the entity's information system and related control activities to achieve objectives and respond to risks. 12. Management should implement control activities through policies.
Information & Communication	13. Management should use quality information to achieve the entity's objectives. 14. Management should internally communicate the necessary quality information to achieve the entity's objectives. 15. Management should externally communicate the necessary quality information to achieve the entity's objectives.
Monitoring	16. Management should establish and operate a monitoring mechanism that monitors both internal and external activities that impact the control system and evaluate the results. 17. Management should remediate identified internal control deficiencies on a timely basis.