

OFFICE OF THE STATE AUDITOR

DIANA DIZOGLIO

Official Audit Report – Issued December 26, 2024

Municipal Police Training Committee

For the period January 1, 2021 through December 31, 2022



OFFICE OF THE STATE AUDITOR

DIANA DIZOGLIO

December 26, 2024

Jeff W. Farnsworth, Interim Executive Director
Municipal Police Training Committee
42 Thomas Patten Drive
Randolph, MA 02368

Dear Mr. Farnsworth:

I am pleased to provide to you the results of the enclosed performance audit of the Municipal Police Training Committee. As is typically the case, this report details the audit objectives, scope, methodology, findings, and recommendations for the audit period, January 1, 2021 through December 31, 2022. As you know, my audit team discussed the contents of this report with agency managers. This report reflects those comments.

I appreciate you and all your efforts at the Municipal Police Training Committee. The cooperation and assistance provided to my staff during the audit went a long way toward a smooth process. Thank you for encouraging and making available your team. I am available to discuss this audit if you or your team has any questions.

Best regards,



Diana DiZoglio
Auditor of the Commonwealth

cc: Terrence Reidy, Secretary of the Executive Office of Public Safety and Security
Chief James Hicks, Chair of the Municipal Police Training Committee

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LIST OF ABBREVIATIONS

CMR	Code of Massachusetts Regulations
CTR	Office of the Comptroller of the Commonwealth
EOPSS	Executive Office of Public Safety and Security
ICP	internal control plan
MPTC	Municipal Police Training Committee
ROC	recruit officer training
RCTR	Recruit Curriculum Training Report

EXECUTIVE SUMMARY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of the Municipal Police Training Committee (MPTC) for the period January 1, 2021 through December 31, 2022.

The purpose of our audit was to determine the following:

- whether MPTC developed and implemented the trainings required by Chapter 69 of the Acts of 2018 (also known as the Criminal Justice Reform Act) and Chapter 253 of the Acts of 2020 (also known as the Police Reform Law), which are codified in Sections 116 A–D and G–K of Chapter 6 of the General Laws;
- whether MPTC ensured that all MPTC-operated and MPTC-authorized training academies delivered a standardized training curriculum as required by Section 4(f)(1) of Chapter 6E of the General Laws; and
- whether MPTC processed permanent exemptions to, and temporary waivers of, training requirements in accordance with Section 3.03 of Title 550 of the Code of Massachusetts Regulations.

Below is a summary of our findings, the effects of those findings, and our recommendations, with links to each page listed.

Finding 1 Page 18	MPTC did not ensure that all training academies delivered a standardized recruit officer course (ROC) curriculum.
Effect	By not delivering a standardized training curriculum, MPTC provides inadequate assurance that all police officers in the Commonwealth have been exposed to the concepts, skills, and tactics that have been determined to be critical for effective policing by the law and MPTC. This may lead to inconsistent law enforcement practices, which may jeopardize the safety of the public and police officers because law enforcement officers may not be properly equipped to perform their jobs safely and effectively. This also creates financial risk for municipalities that employ officers who are insufficiently trained.
Recommendations Page 22	<ol style="list-style-type: none">1. MPTC should develop and implement sufficient policies and procedures, including a monitoring component, to ensure that all training academies deliver a standardized ROC curriculum.2. MPTC should ensure that training academies submit all required Recruit Curriculum Training Reports (RCTRs).3. MPTC should review and approve RCTRs to ensure that the standard ROC curriculum is delivered at all training academies and that academy directors certify RCTRs.

Finding 2 Page 20	MPTC did not ensure that all ROCs were taught by certified instructors.
Effect	Without proper certification, instructors may lack the expertise or experience necessary to effectively teach the concepts, skills, and tactics that MPTC has determined to be critical for effective policing. This could lead to variations in the instruction that police officers receive, potentially impacting their ability to perform their jobs safely and effectively.
Recommendations Page 20	<ol style="list-style-type: none">1. MPTC should develop and implement policies and procedures to monitor recruit training academies to ensure that instructors are certified at the time of instruction.2. MPTC should ensure that its RCTRs capture complete information about instructors (such as full name and Acadis identification number) so that instructors can be easily identified.
Finding 3 Page 21	MPTC's internal control plan (ICP) was not updated annually and did not address the impact of COVID-19 on its operations in accordance with guidance issued by the Office of the Comptroller of the Commonwealth.
Effect	An ICP identifies objectives and risks and identifies control activities to mitigate risks that might prevent an agency from accomplishing its objectives in service to the public. Without updating its ICP, MPTC may not identify and/or mitigate all the risks, including those that resulted from the pandemic.
Recommendation Page 22	MPTC should establish policies and procedures, including a monitoring component, to ensure that its ICP is updated annually and when significant changes occur.

In addition, during our audit we identified an issue regarding MPTC's management of police officer training records (see [Other Matters](#)).

OVERVIEW OF AUDITED ENTITY

The Municipal Police Training Committee (MPTC), an agency within the Executive Office of Public Safety and Security (EOPSS), was established by Section 116 of Chapter 6 of the Massachusetts General Laws.

According to MPTC's fiscal year 2024 internal control plan,

The MPTC's mandate and mission is to set the police training standards for all law enforcement officers certified by the Massachusetts Peace Officer Standards and Training Commission ("POST"), and to develop, deliver, and maintain a record of that training for over 23,000 police officers (municipal, [Massachusetts Bay Transportation Authority], environmental, campus, hospitals), deputy sheriffs, harbormasters, constables, and other statutorily defined personnel who perform police duties and functions in the Commonwealth. These responsibilities are to be carried out in a way that ensures high quality, standardized, community-oriented training.

MPTC is administered by an executive director, who is selected by the Secretary of EOPSS, and a committee of voting and advisory (nonvoting) members.

MPTC's oversight board, also called the Municipal Police Training Committee, comprises the following 15 voting members: five chiefs of police (four from different regions of the Commonwealth and one from the Massachusetts Bay Transportation Authority, all appointed by the Governor), the police commissioner of the City of Boston, the colonel of the State Police, the Attorney General, the president of the Massachusetts Association of Women in Law Enforcement, the chair of the Massachusetts Association of Minority Law Enforcement Officers, two sheriffs appointed by the Governor, one chief of police selected by the Massachusetts Chiefs of Police Association, one police officer appointed by the Governor, and one person designated by the Secretary of EOPSS. Members are appointed for three-year terms. The board chair is elected annually by the board members.

In addition, a 17-member nonvoting, advisory committee provides MPTC with expert advice and various perspectives to enhance training standards and policy development. Further, a seven-member MPTC Standards Subcommittee provides MPTC with advice on legal and policy issues, adjudicates discipline appeal hearings involving student officers, and makes recommendations to MPTC on certain administrative decisions.

New Recruit Training

According to Section 96B of Chapter 41 of the General Laws, all newly hired full-time police officers in Massachusetts are required to complete an entry-level training curriculum approved by MPTC. This training curriculum, known as the recruit officer course (ROC), is an 800-hour training program composed of 358 hours of classroom instruction and 442 hours of skill development training. The ROC is delivered in 46 lessons conducted by MPTC-certified instructors.

According to MPTC's website,

The ROC takes 20 weeks to complete and covers 21st century policing best practices with specific emphasis on the following core principles:

- *problem solving*
- *procedural justice*
- *ethical decision making*
- *fair and impartial policing*

New recruits must also pass a physical ability test, undergo a comprehensive medical exam, maintain medical coverage throughout their time in recruit training, and have a cruiser to use for one week of training, according to MPTC regulations.

In-Service Training

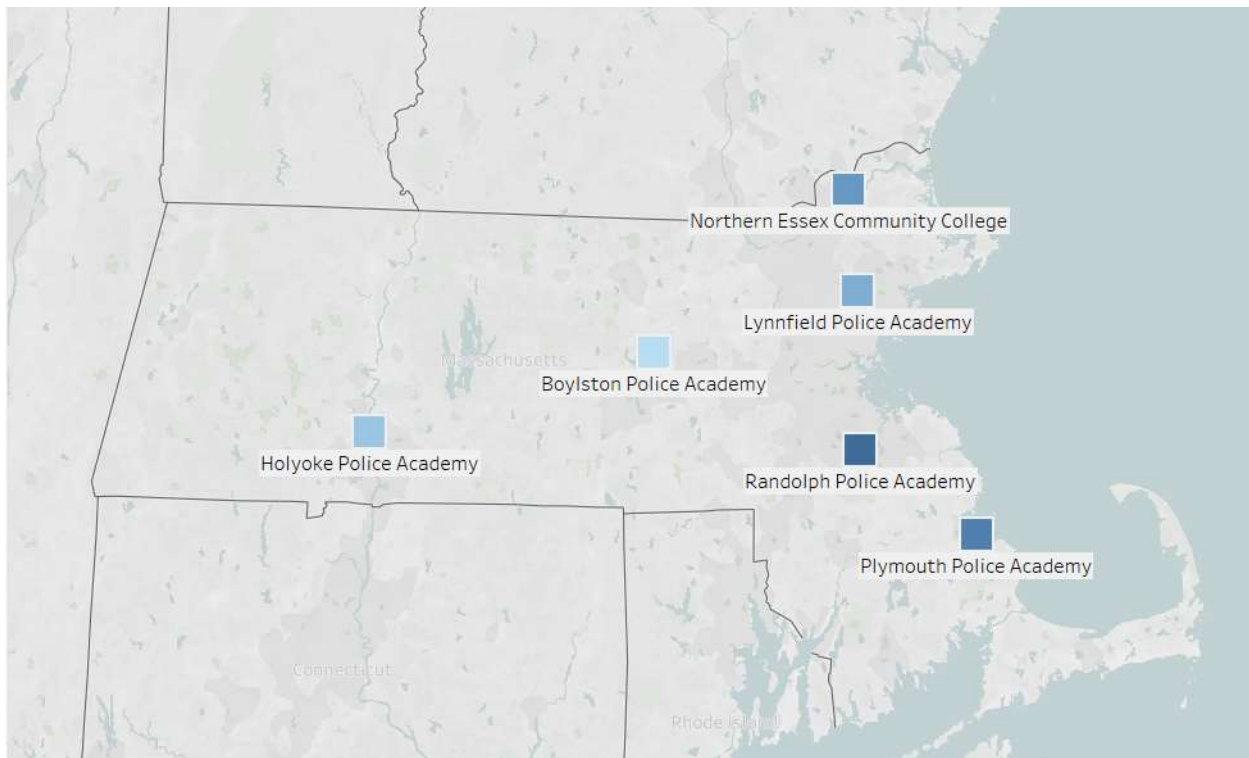
In addition to completing the ROC, police officers of all statuses, including reserve and intermittent officers, are required to complete an annual in-service training curriculum developed by MPTC. Completion of this in-service training is necessary to maintain their Peace Officer Standards and Training Commission¹ certification necessary to exercise police powers.

MPTC develops in-service training topics and establishes required training hours based on legal mandates and input from its oversight board. Upon MPTC approval of the topics, MPTC staff develop the formal in-service curriculum. For the 2021–2022 training year, which coincides with the audit period, MPTC developed a nine-lesson, 30-hour in-service training program.

1. The Peace Officer Standards and Training Commission is a free-standing commission created by Chapter 253 of the Acts of 2020 to improve policing, enhance public confidence, and certify police officers.

MPTC-Operated Police Academies

MPTC holds recruit and in-service police training at six training academies² across the Commonwealth. Within these locations, MPTC is responsible for matters related to registration and enrollment, as well as collecting tuition for recruit training. MPTC-operated police academies are directly operated by MPTC instructors and employees. MPTC-operated police academies are funded by MPTC's annual legislative appropriation and a \$3,200 tuition fee per student officer paid by the hiring police department or the officer, which is set by statute.

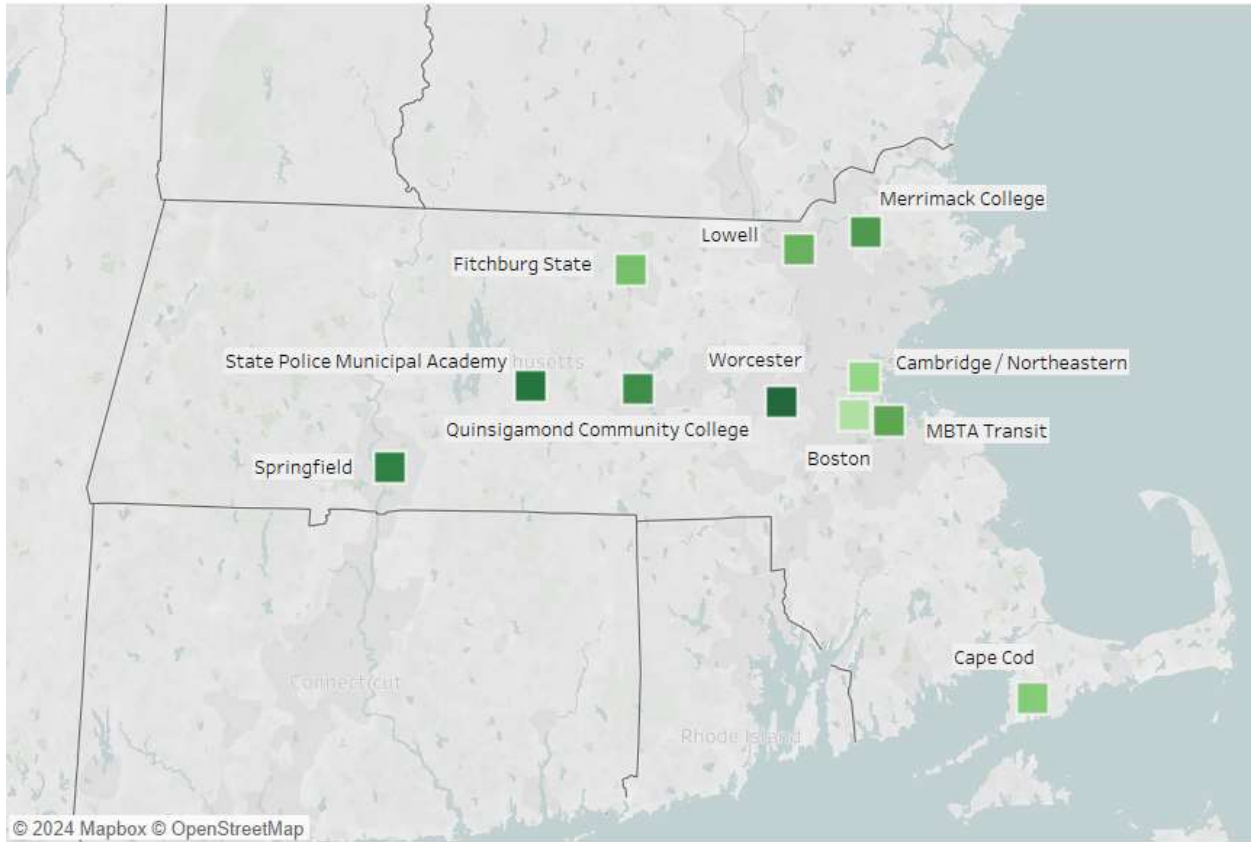


MPTC-Authorized Police Academies

There are 11 other police academies across the Commonwealth that are authorized by MPTC, but MPTC does not oversee their operations, applications, or tuition fees. As displayed below, MPTC-authorized police academies are staffed by contracted instructors and are often located at, and operated by, large municipalities such as Boston and Springfield; large agencies such as the Massachusetts Bay

2. MPTC-operated training academies are located in Boylston, Holyoke, Lynnfield, Haverhill, Plymouth, and Randolph.

Transportation Authority; or in collaboration with municipal police departments and institutions of higher learning, such as the Cambridge Police / Northeastern University academy.



Academy Directors

All MPTC training centers are headed by an academy director who is responsible for the daily operations of the training center and ensures its compliance with all MPTC requirements, including the delivery of MPTC's prescribed training programs. MPTC training centers are sited regionally to increase local involvement and reduce commuting and other training costs.

At the conclusion of training, the academy director must submit an After-Action Report to the MPTC director of training that provides an overview of the overall performance of the training academy. The After-Action Report includes a detailed Recruit Curriculum Training Report that lists all lessons and classroom hours delivered and requires the academy directors to certify that MPTC's standard curriculum was delivered to all student officers by MPTC-certified instructors.

MPTC uses the Acadis Readiness Suite, a web-based law enforcement learning management system and training records database, to deliver portions of the in-service training program and to maintain and monitor all training records and requirements for all law enforcement officers throughout the Commonwealth. MPTC uses mptctraining.com to distribute lesson plans to instructors, student officers, and veteran officers.

MPTC Instructor Certification Process

All instruction at MPTC-operated and MPTC-authorized academies is required to be delivered by MPTC-certified instructors. To become an MPTC-certified instructor during the audit period, candidates had to be recommended by a police department chief or designee to MPTC, have at least three years of full-time law enforcement experience, have successfully completed MPTC's Train the Trainer course to develop classroom teaching skills, and have completed an MPTC Instructor Development course to verify proficiency in the subjects³ they seek to instruct. Upon successful completion of the instructor training courses, the instructor candidate would apply for certification using a webform in the Acadis Training Portal. They would submit the form to the MPTC instructor certification coordinator, who would review the file and issue the instructor certification, if appropriate.

Certified instructors must remain in good standing by complying with their annual in-service training and complying with the MPTC Instructor Code of Conduct. Instructor certifications must be renewed every three years.

Exemptions and Waivers from the Recruit Officer Training Requirement

Under certain circumstances, Section 96B of Chapter 41 of the General Laws allows MPTC to exempt or waive a newly hired police officer from completing the training requirements, upon petition of their employing law enforcement department.

Under Section 3.03(1)(a) of Title 550 of the Code of Massachusetts Regulations (CMR), a person appointed as a full-time law enforcement officer in Massachusetts could receive an exemption if that person completed a recruit training program "substantially equivalent or greater" to MPTC's ROC program and has completed two years of equivalent police experience. Exemptions are typically requested when hiring

3. Subjects include defensive tactics, domestic violence, firearms, CPR / first responder, and patrol procedures.

an experienced law enforcement officer from another state. The law enforcement department submits the petition to MPTC and must support this petition with the following:

- a certification of graduation of basic recruit training and a curriculum listing all course titles and total hours completed in the training;
- a current résumé describing the two years of equivalent police experience;
- a current certification in CPR and first aid; and
- a current qualification in the use of firearms issued by an MPTC-certified instructor.

If granted an exemption, the officer must successfully complete the Massachusetts Police Officer Orientation Program within 90 days after the exemption is granted.

Under 550 CMR 3.03(1)(b), an employing law enforcement department can petition MPTC for a temporary waiver during a “documented public safety emergency or other exigent circumstance” to allow a reserve intermittent officer⁴ to serve as full-time officer for up to 270 days before enrolling in and attending a Massachusetts ROC academy. The temporary waiver petition must be supported by the following documentation:

- a certificate of completion from a MPTC-approved reserve / intermittent officer training program;
- a cover letter from the police chief or hiring authority citing the public safety emergency or other exigent circumstance;
- a current résumé describing the two years of equivalent police experience;
- a current certification in CPR and first aid; and
- a current qualification in the use of firearms by an MPTC-certified instructor.

After a review of the exemption or waiver petition, the MPTC Standards Subcommittee votes to recommend that MPTC grant or deny the petition. A full committee vote is then taken to grant or deny the petition.

4. A reserve intermittent officer is a person appointed to a part-time position who will exercise police powers. Examples include officers who are hired on a seasonal basis or to cover temporary staffing shortages.

Police Reform Legislation

Chapter 69 of the Acts of 2018 directed MPTC, in consultation with EOPSS, to develop an in-service training program to train veteran police officers in the following areas:

- bias-free policing, including awareness of attitudes and stereotypes that affect law enforcement action;
- de-escalation and disengagement tactics and techniques and procedures in civilian interactions that promote community trust and confidence; and
- handling mental health emergencies and complaints involving victims, witnesses, or suspects with a mental illness or developmental disability, including strategies to reduce or prevent the risk of harm to these individuals during interactions.

Chapter 69 of the Acts of 2018 also established a Municipal Police Training Fund, adding Section 35EEE to Chapter 10 of the General Laws, which authorized MPTC to collect up to \$10 million annually from a \$2 surcharge imposed on all vehicle rental transactions in the Commonwealth. The fund was created to provide funding for basic recruit training for new police officers, mandatory in-service training for veteran police officers, specialized training for veteran police officers and reserve and intermittent police officers, and the basic training program for reserve and intermittent police officers.

Chapter 253 of the Acts of 2020 expanded Section 116 of Chapter 6 of the General Laws to require MPTC to develop specific training to address certain law enforcement issues, including the following:

- At least eight hours of recruit basic training on handling and responding to domestic and sexual violence complaints, enforcing criminal laws, and the availability of community resources to protect domestic and sexual violence victims—this training includes specific training on adolescent development, trauma, and family dynamics (Section 116A of Chapter 6 of the General Laws).
- “Instruction for police officers in identifying, responding to and reporting all incidents of hate crime” (Section 116B of Chapter 6 of the General Laws).
- At least 20 hours of recruit basic training on how to use technology for public safety—the course must include the following: computer technology, how to use the Department of Criminal Justice Information Services’ processing system, automation, data usage and system security, and mobile computing (Section 116C of Chapter 6 of the General Laws).
- Policies and procedures for the identification and immediate protection, care, and custody of minors whose parents or guardians are arrested or placed in custody by police officers (Section 116D of Chapter 6 of the General Laws).

- Bias-free policing, including awareness of attitudes and stereotypes that affect law enforcement action; practices and techniques in civilian interaction that emphasize de-escalation and disengagement tactics; handling emergencies and complaints involving victims, witnesses, or suspects with mental illness, substance use disorder, trauma history or developmental or intellectual disabilities; techniques in responding to mass gatherings or protests that emphasize de-escalation and minimizing the necessity for use of force (Section 116G of Chapter 6 of the General Laws).
- In consultation with experts in child and adolescent development and child trauma and educators and attorneys experienced in juvenile and education law, a program to prepare school resource officers on (1) the different legal standards regarding police interaction and arrest procedures for juveniles compared to adults, (2) child and adolescent cognitive development, (3) engagement and de-escalation tactics that are specifically effective with youth, and (4) strategies for resolving conflict and diverting youth in lieu of making an arrest (Section 116H of Chapter 6 of the General Laws).
- A program to train law enforcement officers “in appropriate interactions and tactics with persons on the autism spectrum and those with other intellectual and developmental disabilities”—the training requires recruits to interact with victims of or witnesses to a crime or those who have been suspected or convicted of a crime (Section 116I of Chapter 6 of the General Laws).
- In consultation with EOPSS, recruit and in-service training programs on the use and regulation of physical force (Section 116J of Chapter 6 of the General Laws)—the training is required to include the provisions of Section 14 of Chapter 6E of the General Laws, which require, in part, that law enforcement officers not use physical or deadly force unless they have attempted de-escalation tactics and those tactics have failed, prohibit the use of choke holds and other neck restraint tactics during physical interactions, prohibit an officer from discharging a firearm into or at a fleeing motor vehicle unless it is necessary to prevent imminent harm to a person and that discharge is proportionate to the threat of imminent harm, and provide strategies for mass gathering and tactics to avoid and de-escalate potential conflicts at mass gatherings.
- An annual two-hour training of law enforcement officer mental wellness and suicide prevention for recruit and in-service training programs—the trainings are required to “include information on the mental health resources available . . . and shall be designed to reduce and eliminate the stigma associated with law enforcement officers receiving mental health services” (Section 116K of Chapter 6 of the General Laws).

AUDIT OBJECTIVES, SCOPE, AND METHODOLOGY

In accordance with Section 12 of Chapter 11 of the Massachusetts General Laws, the Office of the State Auditor has conducted a performance audit of certain activities of the Municipal Police Training Committee (MPTC) for the period January 1, 2021 through December 31, 2022.

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.

Below is a list of our audit objectives, indicating each question we intended our audit to answer; the conclusion we reached regarding each objective; and, if applicable, where each objective is discussed in the audit findings.

Objective	Conclusion
1. Did MPTC develop and implement the trainings required by Chapter 69 of the Acts of 2018 (also known as the Criminal Justice Reform Act) and Chapter 253 of the Acts of 2020 (also known as the Police Reform Law), which are codified in Sections 116A–D and G–K of Chapter 6 of the General Laws?	Yes
2. Did MPTC ensure that all MPTC-operated and MPTC-authorized training academies delivered a standardized training curriculum as required by Section 4(f)(1) of Chapter 6E of the General Laws?	No; see Findings <u>1</u> and <u>2</u>
3. Did MPTC process permanent exemptions to, and temporary waivers of, training requirements in accordance with Section 3.03 of Title 550 of the Code of Massachusetts Regulations (CMR)?	Yes

To accomplish our audit objectives, we gained an understanding of MPTC’s internal control environment relevant to our objectives by reviewing applicable policies and procedures and by interviewing MPTC officials. We evaluated the design and tested the operating effectiveness of internal controls related to the delivery of standardized training by MPTC-operated and MPTC-authorized training academies and the approval of exemptions and temporary waivers of training requirements. In performing our work, we found that MPTC did not have an updated internal control plan (ICP). See Finding 3.

To obtain sufficient, appropriate evidence to address our audit objectives, we performed the procedures described below.

Required Training Content

To determine whether MPTC developed and implemented the trainings required by statute, we traced Sections 116A–D and G–K of Chapter 6 of the General Laws to MPTC lesson plans. Specifically, we confirmed that the lesson plans included training on the following topics:

- domestic and sexual violence complaints;
- hate crimes;
- how to use technology to increase public safety;
- the protection, care, and custody of minors upon arrest of their parents or guardians;
- bias-free policing and de-escalation and disengagement tactics, specifically for incidents impacted by people with mental health issues or developmental disabilities;
- in-service training program for school resource officers;
- training program for appropriate interactions with people on the autism spectrum or with other intellectual and developmental disabilities;
- regulation of physical force; and
- police officer mental wellness and suicide prevention.

We also reviewed emails and meeting agendas to determine whether MPTC collaborated with state agencies and other appropriate groups to develop and deliver content when required by statute.

We noted no exceptions in our testing. Therefore, we concluded that, during the audit period, MPTC developed and implemented the trainings required by Chapter 69 of the Acts of 2018 and Chapter 253 of the Acts of 2020, which are codified in Sections 116A–D and G–K of Chapter 6 of the General Laws.

Delivery of a Standardized Training Curriculum

Recruit Officer Course

We examined the Basic Recruit Curriculum Training Reports (RCTR) for all 46 Recruit Officer Course (ROC) training academies that commenced during the audit period. We did this to determine whether MPTC-operated and MPTC-authorized academies delivered MPTC-approved ROC lesson plans (each

composed of 46 lessons across 800 hours) to all 1,618 student officers enrolled during the audit period. We inspected the RCTR to determine whether every lesson was delivered with the proper number of classroom and skill development hours as specified in the MPTC Academy Director's Manual. We also inspected each lesson plan's version number reported on the RCTR to determine whether each lesson plan was current at the time of instruction. Further, we determined whether the academy directors certified, in writing, that all student officers named on the final ROC academy roster successfully completed the prescribed course of study as described in the MPTC Annual Course Catalog.

To determine whether MPTC instructors had valid MPTC certifications for the subject matter they taught at the time the class was delivered, in accordance MPTC's Academy Director's Manual (Version: F2021), we judgmentally⁵ selected for testing a nonstatistical sample of 10 out of the 46 training academies that commenced during the audit period. We compared each instructor's name listed on the RCTR to the instructor database within Acadis to determine whether the instructor was certified in the subject matter on the date that they delivered the course.

In-Service Training for Veteran Officers

We examined the Training Year In-Service Compliance Report for July 1, 2021 through June 30, 2022 generated by Acadis, which gave us a population of 17,696 officers from 452 law enforcement departments. We separated the population into two groups: 16,726 officers reported as having fulfilled the in-service training requirement (fulfilled group) and 970 officers reported as not having fulfilled their in-service training requirement by September 30, 2022⁶ (unfulfilled group). We

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5. Auditors use judgmental sampling to select items for audit testing when a population is very small, the population items are not similar enough, or there are specific items in the population that the auditors want to review. Auditors use their knowledge and judgment to select the most appropriate sample. For example, an auditor might select items from areas of high risk. The results of testing using judgmental sampling cannot be used to make conclusions or projections about entire populations; however, they can be used to identify specific issues, risks, or weaknesses.
 6. Although the in-service training year ends June 30, MPTC allows a 90-day reporting grace period for in-service training delivered at MPTC-authorized training locations.

statistically⁷ sampled the fulfilled group at a 90% confidence level⁸ with an expected error rate⁹ of 0% and a tolerable error rate¹⁰ of 5% for a sample size of 47 officers. Using the Acadis software, we inspected each fulfilled officer's training record to confirm that the officer completed the nine-lesson curriculum of the in-service training program by June 30, 2022.

We took a random, nonstatistical sample of 60 officers from the unfulfilled group. We analyzed each unfulfilled officer's training record to determine whether the unfulfilled status was accurate and whether any unfulfilled records were the result of the officer's noncompliance with the annual in-service training requirement.

We determined that MPTC did not ensure that all training academies delivered a standardized ROC curriculum (see Finding 1). In addition, we found that MPTC did not ensure that all lessons within the ROC curriculum that were delivered during the audit period were taught by certified instructors (see Finding 2).

Permanent Exemptions

To determine whether MPTC processed permanent exemptions to statutory police officer training requirements in accordance with 550 CMR 3.03, we took the actions described below.

MPTC provided us with an Excel list of all 124 petitions for exemptions received by MPTC during the audit period, which listed the user identification number, name, police department, date of the board vote, examination date, and approval/denial of the exemption. We organized these petitions into three separate groups. The first group comprised petitions for exemption that were unconditionally approved by MPTC (total of 85). The second group comprised petitions for exemption that were conditionally approved (total of 16). The third group comprised petitions for exemption that were not approved (total of 23). Of the 23 petitions for exemption that were not approved, 10 were denied and 13 were classified as "not applicable," "tabled," or "withdrawn," and were not presented to MPTC for consideration.

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7. Auditors use statistical sampling to select items for audit testing when a population is large and contains similar items. Auditors generally use a statistical software program to choose a random sample when sampling is used. The results of testing using statistical sampling, unlike those from judgmental sampling, can usually be used to make conclusions or projections about entire populations.
 8. Confidence level is a mathematically based measure of the auditor's assurance that the sample results (statistic) are representative of the population (parameter), expressed as a percentage.
 9. Expected error rate is the number of errors that are expected in the population, expressed as a percentage. It is based on the auditor's knowledge of factors such as prior year results, the understanding of controls gained in planning, or a probe sample.
 10. The tolerable error rate (which is expressed as a percentage) is the maximum error in the population that is acceptable while still using the sample to conclude that the results from the sample have achieved the objective.
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For the petitions for exemption that were unconditionally approved by MPTC, we selected a random, nonstatistical sample of 15 from the population of 85. For the petitions for exemption that were conditionally approved, we selected all 16. For the petitions for exemption that were not approved by MPTC, we selected all 10 that were denied. Combined, our total sample comprised 41 petitions for exemption.

For each of the petitions for exemption in our sample of 41, we verified that all required documents were present in the application file and that the content met the criteria stated in the regulations. We then examined MPTC monthly meeting minutes to determine whether the exemption applications were presented to and approved by both the MPTC Standards Subcommittee and the full MPTC.

We noted no exceptions in our testing. Therefore, we concluded that, during the audit period, MPTC processed permanent exemptions to training requirements in accordance with 550 CMR 3.03.

Temporary Waivers

To determine whether MPTC processed waivers of statutory police officer training requirements in accordance with 550 CMR 3.03, we took the actions described below.

MPTC provided us with an Excel list of all 71 petitions for temporary waivers presented to MPTC during the audit period, which listed the user identification number, name, academy, date of the board vote, examination date, and granting/denial of the waiver. We organized these petitions into two separate groups: 66 waivers that were granted by MPTC and 5 that were denied. We examined each application file to determine whether the required documents were present and that the content met the criteria stated in the regulations. We then examined the MPTC monthly meeting minutes to determine whether the waiver applications were presented to and approved by both the MPTC Standards Subcommittee and full MPTC.

We noted no exceptions in our testing. Therefore, we concluded that, during the audit period, MPTC processed waivers of training requirements in accordance with 550 CMR 3.03.

We used a combination of statistical and nonstatistical sampling methods for testing, and we did not project the results of our testing to any corresponding populations.

Data Reliability Assessment

Acadis Readiness Suite

To determine the reliability of data obtained from the Acadis database, we reviewed the Federal Risk and Authorization Management Program Annual Security Assessment Reports¹¹ performed by Kratos that were published on April 9, 2021 and April 9, 2022 and ensured that certain information system control tests had been performed. In addition, we tested certain general information technology controls (security management, access control, configuration management, segregation of duties, and contingency planning) for the period January 1, 2021 through December 31, 2022. In addition, we tested the application control over attendance to ensure that the officer viewed the slides presented in online training to receive credit for watching the required video lessons.¹²

New Recruits

To determine the reliability of the new recruit data from the Acadis database, we took the following actions. We extracted from the database a list of student officers who were enrolled in ROC academies during the audit period and grouped these student officers by the ROC academy in which they were enrolled. We then compared the names of those student officers to the enrollment rosters contained on the ROC After Action Reports stored in SharePoint for each of the 46 ROC training academies that commenced during the audit period. In addition, we traced 10 training academies from the After Action Reports to the Acadis database and traced 10 training academies from the Acadis database to the After Action Reports to confirm that each academy name and start date and end date of the academy was consistent.

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11. A Federal Risk and Authorization Management Program Annual Security Assessment Report is an annual security assessment of certain software to make risk-based decisions. Use of this assessment is required by the Federal Information Security Management Act of 2002.
 12. Acadis has built-in system controls designed to prevent officers from skipping ahead or bypassing certain sections of the online training content. We tested these controls and determined that they were in place and working as intended during the audit period. However, on November 15, 2024, MPTC notified all chiefs of police departments that it identified instances where officers were using outside technology to override these controls. Certain fiscal year 2025 trainings (outside of the audit period) that should have taken hours to complete were being completed in a matter of minutes. MPTC officials told us that this was still an ongoing investigation.

Veteran Officers

To determine the reliability of the list of veteran officers in the Acadis database, we compared the Acadis list of veteran officers at 452 police departments to the list of required in-service veteran officers produced by the Massachusetts Peace Officer Standards and Training Commission.

Mptctraining.com

Mptctraining.com is a repository software that controls the distribution of the recruit training standardized lesson plans. We assessed the reliability of the data obtained from mptctraining.com by testing certain general information technology controls (security management, access control, configuration management, and segregation of duties) for the period January 1, 2021 through December 31, 2022.

Waivers and Exemptions

To determine the reliability of the lists of petitions for temporary waivers and exemptions presented to MPTC during the audit period, which MPTC provided to us, we checked both lists for hidden rows and columns. To test the accuracy of the lists, we selected a random sample of 20 (10 from each list) police officers from the lists and compared these officers' names, sponsoring agencies, and dates of petitions to source documentation (hardcopy petitions) provided by MPTC. To test the completeness of the lists, we judgmentally selected a different set of 20 (10 from each list) police officers from source documentation at the MPTC office (hardcopy petitions) and traced these back to the lists.

Based on the results of the data reliability assessment procedures described above, we determined that the information we obtained was sufficiently reliable for the purposes of our audit.

DETAILED AUDIT FINDINGS WITH AUDITEE'S RESPONSE

1. The Municipal Police Training Committee did not ensure that all training academies delivered a standardized recruit officer course curriculum.

The Municipal Police Training Committee (MPTC) did not ensure that all training academies delivered a standardized recruit officer course (ROC) curriculum. Specifically, we reviewed Recruit Curriculum Training Reports (RCTRs) for all 46 ROC training academies that commenced during the audit period and identified the following issues:

- Of these 46 ROC training academies, 11 had variations in the required number of classroom hours (ranging from 1 to 26 hours) and/or skill development hours (ranging from 1 to 18 hours).
- Of these 46 ROC training academies, 6 did not deliver all the required lessons. Lessons that were not delivered included topics such as crime prevention, interviews and interrogations, missing person investigations, sexual assault investigations, and water safety.
- Of these 46 ROC training academies, 2 did not submit RCTRs to MPTC.
- Of these 46 ROC training academies, 1 submitted an incomplete RCTR to MPTC.
- Of these 46 ROC training academy directors, 13 did not certify the RCTR that they submitted to MPTC.

By not delivering a standardized training curriculum, MPTC provides inadequate assurance that all police officers in the Commonwealth have been exposed to the concepts, skills, and tactics that have been determined to be critical for effective policing by the law and MPTC. This may lead to inconsistent law enforcement practices, which may jeopardize the safety of the public and police officers because law enforcement officers may not be properly equipped to perform their jobs safely and effectively. This also creates financial risk for municipalities that employ officers who are insufficiently trained.

Authoritative Guidance

Section 4(f)(1) of Chapter 6E of the Massachusetts General Laws states,

The division of police certification and the municipal police training committee . . . shall jointly establish minimum certification standards for all officers that shall include, but not be limited to: . . . (iii) successful completion of the basic training program approved by the municipal police training committee.

Reasons for Issue

MPTC did not have sufficient policies and procedures, including a monitoring component, to ensure that all training academies delivered a standardized ROC curriculum, that academy directors properly prepared and submitted RCTRs to MPTC, and that MPTC management reviewed the RCTRs.

Recommendations

1. MPTC should develop and implement sufficient policies and procedures, including a monitoring component, to ensure that all training academies deliver a standardized ROC curriculum.
2. MPTC should ensure that training academies submit all required RCTRs.
3. MPTC should review and approve RCTRs to ensure that the standard ROC curriculum is delivered at all training academies and that academy directors certify RCTRs.

Auditee's Response

The MPTC has made significant strides in establishing standard operating procedures (SOPs) for its training academies (referred to interchangeably as a "Police Academy" or "Recruit Officer Course" or "ROC") since the start of the audit period. These SOPs are currently being implemented, alongside a new system for documentation. A key element of this system is the introduction of new webforms that will capture more detailed and specific information, with built-in measures to ensure the mandatory input of required data.

These webforms will be generated electronically and stored within Acadis, with an integrated workflow to support monitoring and compliance. One of the critical webforms is the pre-Academy form, which will outline each block of instruction, along with the names and Acadis [identification] numbers of the instructors. These forms will undergo a review process prior to the start of each Police Academy to ensure compliance with instructional standards and instructor certifications. The review will be conducted by the MPTC's Chief of Training, Deputy Chief of Training, or Basic Training Division Manager.

After the completion of each Police Academy, an After Action Report (AAR) will be submitted for review by the MPTC's Chief of Training, Deputy Chief of Training, or Basic Training Division Manager, who will be responsible for approval and final sign-off. In addition, the MPTC is developing a monitoring component for course curricula and instructor performance. This will be managed by the Academy Directors, who will enter data into a project management system for monthly reporting, further enhancing Police Academy accountability and oversight.

Auditor's Reply

Based on its response, MPTC is taking measures to address our concerns regarding this matter.

2. The Municipal Police Training Committee did not ensure that all recruit officer courses were taught by certified instructors.

MPTC did not ensure that all lessons within the ROC curriculum that were delivered during the audit period were taught by certified instructors. We reviewed 10 ROC academies during the audit period and noted that 101 (22%) out of the 460 lessons were delivered by instructors who were not certified. Specifically, we noted the following (please note that the percentages are rounded):

- Of these 101 instructors, 61 (60%) were not certified at the time of instruction;
- Of these 101 instructors, 39 (39%) were not certified until after lesson delivery; and
- Of these 101 instructors, 1 (1%) delivered instruction with an expired certification.

In addition, for 72 lessons reported as being delivered, the RCTRs submitted to MPTC did not contain sufficient information about the instructor to allow us to verify their certification status. Specifically, we identified 54 lessons that were taught by instructors with the same name, 17 lessons where the instructors' names were recorded as "Staff," and 1 lesson where the instructor's name was left blank. These issues made it impossible for us to determine which instructors actually taught lessons.

Without proper certification, instructors may lack the expertise or experience necessary to effectively teach the concepts, skills, and tactics that MPTC has determined to be critical for effective policing. This could lead to variations in the instruction that police officers receive, potentially impacting their ability to perform their jobs safely and effectively.

Authoritative Guidance

According to MPTC's *Academy Director's Manual* (Version: F2021), "Staff Instructors must be certified by MPTC."

Reasons for Issue

MPTC did not have policies and procedures, including a monitoring component, to ensure that all instructors were certified before teaching the class.

Recommendations

1. MPTC should develop and implement policies and procedures to monitor recruit training academies to ensure that instructors are certified at the time of instruction.

2. MPTC should ensure that its RCTRs capture complete information about instructors (such as full name and Acadis identification number) so that instructors can be easily identified.

Auditee's Response

The MPTC has established a Standards and Delivery Division to oversee the certification and renewal process for all MPTC-certified instructors. In line with this, new standard operating procedures (SOPs) have been developed to standardize the certification process and set clear prerequisites for becoming certified. A new form has been introduced to capture the names and Acadis [identification] numbers of all instructors scheduled to teach at the ROCs. Before any ROC is approved to proceed, these instructors are reviewed for compliance by the Standards and Delivery Division.

Additionally, a revised After Action Report (AAR) form has been implemented to capture more detailed information. This form now serves as a secondary method for recording instructor details and verifying certification status. The forms will now have electronic controls that will not allow submission for approval until all required information has been entered. These forms are also integrated into the Acadis system's workflow, which ensures that they cannot be approved without review and authorization by the Chief of Training, Deputy Chief of Training, or Basic Training Division Manager. This system ensures comprehensive oversight and accountability in the certification and approval processes for instructors at the ROCs.

Auditor's Reply

Based on its response, MPTC is taking measures to address our concerns regarding this matter.

3. The Municipal Police Training Committee's internal control plan was not updated annually and did not address the impact of COVID-19 on its operations in accordance with guidance issued by the Office of the Comptroller of the Commonwealth.

MPTC's internal control plan (ICP) was not updated annually in accordance with the Office of the Comptroller of the Commonwealth's (CTR's) "Internal Control Guide," published May, 2022, and did not address the effects of COVID-19 on its operations (when its workforce and training were remote, with controlled access to the building and remote functions in the business office) in accordance with the CTR's "COVID-19 Pandemic Response Internal Controls Guidance," issued September 30, 2020. MPTC's ICP has not been updated since 2015.

An ICP identifies objectives and risks and identifies control activities to mitigate risks that might prevent an agency from accomplishing its objectives in service to the public. Without updating its ICP, MPTC may not identify and/or mitigate all the risks, including those that resulted from the pandemic.

Authoritative Guidance

CTR's *Internal Control Guide*, published May 2022 states, "Your department is obligated to review and update your Internal Control Plan on an annual basis, as well as whenever there is a new objective, risk, or management structure."

CTR's "COVID-19 Pandemic Response Internal Controls Guidance," dated September 30, 2020, states,

Department internal control plans must be based on risk assessments and updated annually, or when significant changes occur. Because the COVID-19 Pandemic has affected all departments, The Comptroller, in consultation with the State Auditor's Office, is providing two options for updating internal controls.

- 1. If the impact to your department is such that it can be reflected in your Internal Control Plan (ICP), then update the ICP as you would for any other mid-year changes.*
- 2. Departments experiencing a significant impact, and requiring the accumulation of substantial documentation (e.g. changes to business processes, requirements of federal and state-specific laws or guidance, new funds or new programs), can draft a separate COVID-19 Pandemic Response Plan Appendix to the ICP as an organized set (hard or soft copies) of emails, documents, risk assessments, policies, and procedures.*

Reasons for Issue

MPTC's executive director stated that MPTC experienced rapid growth as a result of the 2018 and 2020 reforms acts, which required management to prioritize curriculum development and delivery over other organizational duties, including ICP updates during the audit period.

MPTC could not explain the reason it did not update its ICP during 2016 through 2019.

MPTC did not have policies and procedures, including a monitoring component, to ensure that its ICP is updated annually and when significant changes occurred.

Recommendation

MPTC should establish policies and procedures, including a monitoring component, to ensure that its ICP is updated annually and when significant changes occur.

Auditee's Response

The MPTC has updated its Internal Control Plan (ICP) and appreciates the support of both the Office of the State Auditor and the Office of the Comptroller (CTR) throughout this process. Further, the MPTC will establish a policy and procedure, which will include a monitoring component, to

ensure that its ICP is updated annually and when significant changes occur. As recommended by CTR prior to drafting an updated ICP, MPTC leadership, including all Fiscal and Human Resources team members, completed CTR trainings on Fraud Management and Mitigation, and Risk Management and Internal Control. The MPTC's Fiscal and Human Resources teams also completed additional CTR courses such as PowerDMS, Websites Overview, Solution Desk, and State Finance Fundamentals. Subsequently, the MPTC's leadership, including all Fiscal and Human Resources team members, then completed a CTR live Internal Control Plan Workshop, which was designed for our Agency. CTR then confirmed that the MPTC had completed all required trainings it needed to effectively update its ICP, which also included performing a detailed risk analysis of the Agency. The ICP was prepared in accordance with the Office of the Comptroller's Internal Control Guide. The Internal Control Guide is based on the Committee of Sponsoring Organizations' (COSO) Enterprise Risk Management Framework (ERM) with its eight components and seventeen principles. The guide incorporates the Standards for Internal Control in the Federal Government's (known as the Green Book) adaption of COSO's Internal Control — Integrated Framework (2013).

Auditor's Reply

Based on its response, we commend MPTC for taking measures to address our concerns regarding this matter.

OTHER MATTERS

According to Municipal Police Training Committee (MPTC) officials, before July 1, 2021, the effective date of police reform in the Commonwealth, MPTC maintained records of completion of all recruit and in-service training that it delivered to law enforcement officers. These training records were maintained both in physical form (hardcopy) and in an electronic database. One individual at MPTC headquarters was responsible for overseeing these records. MPTC officials also told us that before July 1, 2021, they attempted to collect and maintain records of the completion of training delivered to law enforcement officers by outside sources such as police departments and other MPTC-authorized training providers. However, they emphasized that, at that time, there was no statutory requirement to do so. Beginning on July 1, 2021, Chapter 253 of the Acts of 2020 required MPTC to “maintain records of training for all officers for whom the committee sets policies and standards for training.”

During our audit, we made several observations that raised concerns regarding the security and integrity of MPTC’s training recordkeeping system. Specifically, we noted that although MPTC maintains its hardcopy training records in a locked room at its headquarters, it does not maintain an access log to track who accesses the room, when, and for what purpose. We also noted that some training records appeared to be stored haphazardly—stacked on metal cabinets, without any apparent filing and retrieval method in place. In addition, we experienced several instances during our audit where hardcopy training records that we requested in order to perform our audit work were missing, not readily available, not properly filed, incompletely prepared, or not certified when required (as previously noted in this report).

With an increase in public scrutiny and growing legal liabilities in modern law enforcement practice, we believe it is crucial that MPTC maintain a complete, accurate, and secure training recordkeeping system. Without an organized recordkeeping system, which would include a formal access log, training records are more vulnerable to inappropriate and/or unauthorized access. This compromises the integrity of the records and could lead to (1) officers attending training where the physical records become lost, destroyed, or misfiled, resulting in their failing to receive appropriate credit for training or (2) officers being inappropriately certified or appearing to have completed training they never received because the recordkeeping is unreliable. Additionally, if there is a dispute regarding the integrity of training records, such as the one highlighted by the Civil Service Commission relative to the Methuen Police Department, the lack of an effective recordkeeping system makes it more difficult to resolve these issues definitively.

MPTC should consider transitioning the preparation and maintenance of training records to its Acadis system. Transitioning to digital recordkeeping will improve the transparency and integrity of the recordkeeping process and ensure that MPTC complies with relevant laws and regulations.

Auditee's Response

When police reform legislation (Chapter 253 of the Acts of 2020) went into effect at the end of 2020, the scope of the MPTC's duties and responsibilities expanded from roughly 14,000 law enforcement officers to over 20,000 law enforcement officers, and for the first time included a statutory mandate to maintain training records, including training records for the thousands of officers not previously within the MPTC's scope. In response to this new mandate, the MPTC established a Records Division and staffed it with Records Analysts who, over the past four years, have spent thousands of hours improving police training recordkeeping. Today, every active law enforcement officer in the Commonwealth who is certified by the Peace Officer Standards and Training Commission (POST) has an on-line training account in Acadis that reflects proof of their basic training (Police Academy or exemption) and the status of their annual in-service training.

For thousands of veteran officers who graduated from a Police Academy prior to 2018-2019, Records Analysts searched through the Records Room file cabinets on the second floor of MPTC headquarters, extracted relevant records when they were located, and when they were not located, worked closely with employing departments to obtain proof of an officer's graduation from a Police Academy, or an exemption from that requirement. Once graduation/exemption records were located, they were electronically scanned into each officer's on-line Acadis account.

For thousands of newer officers who have graduated from a Police Academy since 2018-2019, there is an electronic transcript in each officer's Acadis account verifying completion of their basic training.

Commencing on or about July 1, 2022, the MPTC started requiring MPTC-authorized Police Academies to electronically enroll their student officers through Acadis, thus ensuring that all student officers, regardless of whether they attend an MPTC-operated or MPTC-authorized Police Academy, have an online Acadis account at the start of their police career. Further, as noted in a separate Auditee Response, Acadis is increasingly being used to create, record, and retain police training information electronically using webforms, which are replacing the historical use of hardcopy forms retained in records room file cabinets.

Lastly, state record retention laws require the MPTC to maintain historical records, many of which are in the locked Records Room on the second floor at MPTC headquarters. Consistent with the Auditor's recommendation, the MPTC has contracted to improve security on the second floor at MPTC headquarters. Electronic keypads have been installed on hallway doors leading to the locked Records Room door, and the locked Records Room door itself will now have a new electronic keypad. These keypads limit access to MPTC employees only. Unlike the existing keypads, which utilize fob access and retain access data in a manner and for a period of time that is controlled by the MPTC's landlord, the new electronic keypads will require MPTC employees to enter their

assigned unique identification number, and the recording and storage of that information will reside with the MPTC's Facilities Manager.

As the Auditor's Report correctly notes, it is crucial that the MPTC maintain a complete, accurate, and secure training recordkeeping system. The MPTC has taken concrete, substantive steps towards achieving this important objective.

Auditor's Reply

Based on its response, we commend MPTC for taking measures to address our concerns regarding this matter.