



AUDIT INFORMATION

Audit Unit: Fire Emergency Communications **Distribution:** Dawn Jarvis, Manager Fire Administration & Communications

Service: Fire 911 Communications **cc:** Dave Lazenby, Fire Chief

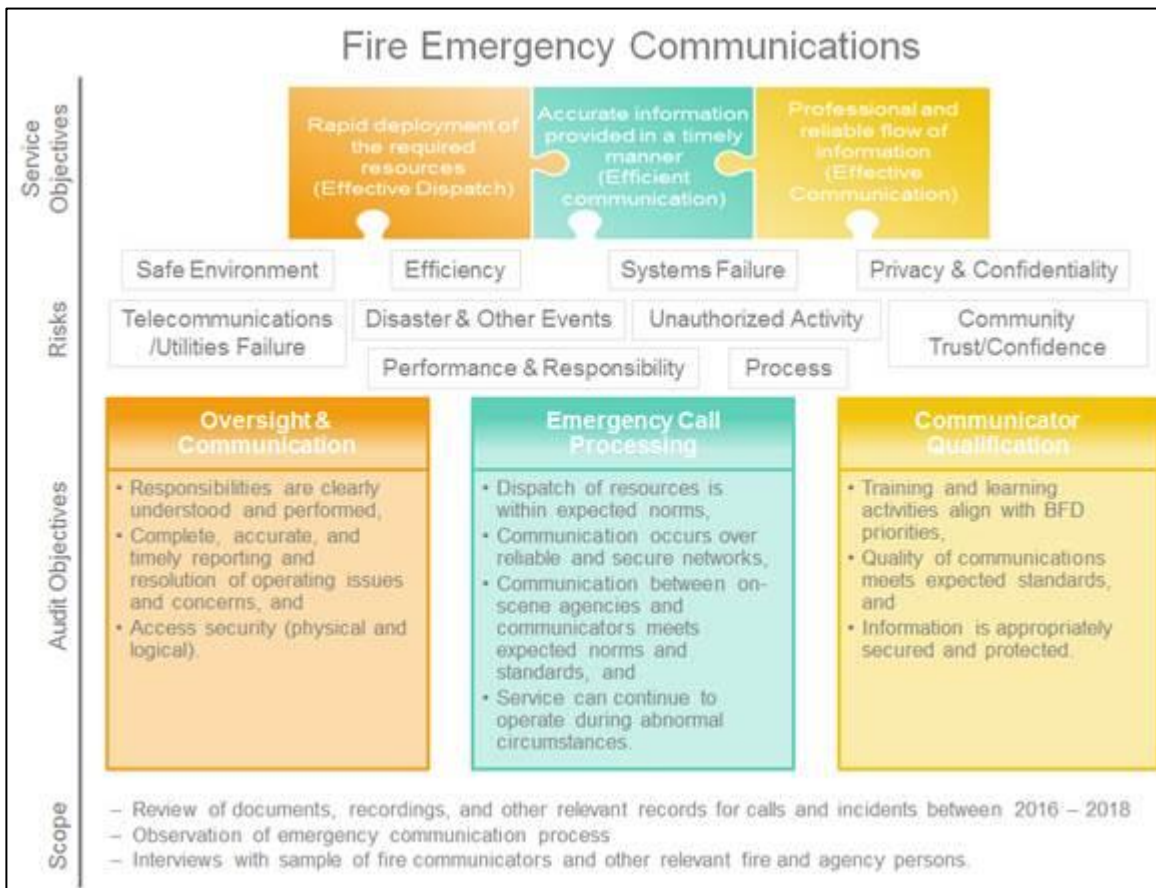
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SUMMARY OF AUDIT RESULTS

Area of Focus



Audit Period

This audit included call volumes and work performed in the period January 1, 2016 to October 31, 2018.

SUMMARY OF AUDIT RESULTS

What is Working Well

Oversight & Communication

- Documented job description/role responsibilities and authorities exist only for the manager and are consistent with responsibilities described by the manager.
- Supervisor and public safety telecommunicators (PSTs) are expected to follow NFPA 1061. Responsibilities described are consistent with the NFPA standard.
- The access to the center has physical restrictions to minimize non-authorized entry.

Emergency Call Processing

- Service level agreements between the City and its software vendors exist and are followed for technical issue resolution.
- Triparty Agreement established for fire dispatch service delivery between the City of Burlington, Town of Oakville and Town of Halton Hills.
- Regular testing of the communications system is in place and operating effectively.
- Manual dispatching is the current back up model for short term interruptions and can put in place with minimal disruption.
- Public safety telecommunicators call taking, and call dispatch times met NFPA standards.

Public Safety Telecommunicator Qualifications

- With exception of one PST, all PSTs have achieved certification through the Association of Public-Safety Communications Officials (APCO) Fire Service Communicator. The exception is a new employee who will be seeking the certification in 2019.
- Mentoring and training program is in place for new hires.

Findings by Severity

(See definitions on Page 21)

Category	High	Medium	Low
Oversight & Communication	-	1	2
Emergency Call Processing	2	-	-
Public Safety Telecommunicators Qualifications	-	-	-

Refer to **Appendix 1** (page 9) for details of the audit findings and recommendations

Overall Rating

Fair

(See definitions on Page 21)

SUMMARY OF AUDIT RESULTS

Why?

Processes and activities are in place to support the service in achieving the effective dispatch and effective and efficient communication objectives. Key controls in oversight and communication and emergency call processing are not designed appropriately to mitigate the risks and there are opportunities for improving the operation of certain controls.

Oversight & Communication

- A formalized issue reporting process and feedback loop are not in place. Standardized issue reporting is key control to collect relevant information in a timely manner, support effective problem resolution and trend analysis. An issue log is a form of corrective control designed to correct issues, problems or irregularities that have been detected; the objective is to keep the issue, problem or irregularity in view until it is resolved.

Emergency Call Processing

- The quality assurance (QA) process is not operating as intended. The SOG is dated, contains guidance or actions no longer relevant or that have changed, and is silent on parameters for the QA process (e.g. the percentage of calls to review, the frequency of the review, etc.). QA is a key detective control to identify what has and has not been done correctly and in compliance with procedures.
- Throughout 2018, work was underway to create an alternate site to support service continuity in the event the primary site is deemed inoperable. The pace of development has slowed considerably during 2018 given other time sensitive priorities including focus on new computer aided dispatch (CAD) implementation and providing fire dispatch service delivery to another municipality within the Region of Halton. Evacuation of the Center is a known critical risk. A business continuity plan (including an alternate site for operations) is a preventive control designed to minimize the effects of a business disruption.

Closing Comments

Many thanks to management and staff of the Burlington Fire Department, specifically in fire communications and officers in fire suppression (Burlington Station #1 and Oakville Station #3), as well as Information Technology Services, for the cooperation and support extended to me during this audit.

Fire Management Comments

Both the QA and alternate site are items that have already been identified within the fire department as areas that need to be focused on. As mentioned, due to other project priorities and workload capacity these two items were delayed to the 2019 department workplan. The QA program is already in the works and will align with the APCO Standard for the Establishment of a Quality Assurance (QA) and Quality Improvement (QI) Program for Public Safety Answering Points, which is recognized as a best practice. The alternate site is already in the works with a lot of work already completed, the location has been determined, capital budget has been approved, quotations for work has already been provided and it is listed as the highest priority project for the fire department.

Fire 911 Communications

Fire 911 Communications is a public service responsible for effective 911 fire call handling and dispatching of the required fire resources to mitigate emergencies and monitor emergency responders and the public during an emergency call for assistance.

The current service provides a community public safety answering point (PSAP) to start and coordinate the response of fire protection resources and manage the flow of incident-related information to and from emergency responders and/or community agency resources. In addition, the service provided includes monitoring the status of emergency responders, assigning additional resources as required; all the while emphasizing the safety of the public and emergency responders.

The City of Burlington provides 911 fire call handling and dispatching services for the communities of the City of Burlington, Town of Oakville and Town of Halton Hills.

Call Volumes

Fire 911 Communications reported call volumes is approximately 22,000 emergency incidents for all three municipalities.

Staffing

Fire emergency communication is provided by a management and staff team including:

- 1 Manager, Fire Administration & Communications
- 1 Supervisor, Public Safety Telecommunications
- 10 full-time Public Safety Telecommunicators
- 4 part-time Public Safety Telecommunicators
- 1 IT Systems Coordinator (Fire)
- 1 CAD Application Analyst (Fire)

Public Safety Telecommunicators (PSTs) work in teams to provide the service 24/7 365 days a year. Working through 12-hour shifts, 3 PSTs work the day-shift and 2 PSTs work the night-shift, due to call volume requirements. The Supervisor's normal schedule is weekdays during regular hours. After hour support is provided by the on-duty Platoon Chief.

Internal Partnerships

Though Fire Emergency Communications has partnerships with all corporate functions (e.g. human resources, finance, legal, etc.), its partnership with Information Technology Services (ITS) is more pronounced. While the IT Systems Coordinator (Fire) and CAD Application Analyst (Fire) report through the Manager Business Applications in ITS, these positions physically reside in the premises of the communications centre to provide direct technical support.

DETAILED AUDIT REPORT

Systems & Equipment

Fire emergency communication is supported by several interfacing systems. The major systems include:

1. Computer Aided Dispatch (CAD)
2. Station Alerting
3. Multimedia emergency call recording
4. AQS (Automatic number identification (ANI) and automatic location identifier (ALI) – Bell 911)
5. Records Management System (RMS)
6. Geographic Information Systems (GIS)
7. Mobile Data Terminals (MDT)
8. Property records

Radios, pagers, telephones, MDTs, and other devices are used to communicate with emergency responders.

Standards

The Ontario Office of the Fire Marshal has adopted National Fire Protection Association (NFPA) standards for the delivery of fire protection services. These Standards outline the skill and requirements necessary for certification in the delivery of fire protection services including fire education and prevention and fire suppression.

In January 2020 or sometime thereafter (depending on timing of legislative changes), Standard for Professional Qualifications for Public Safety Telecommunications Personnel (NFPA 1061) will be included in O. Reg. 379/18, s. 5 (2) requiring certification of public safety telecommunicators. In anticipation of this inclusion, the public safety telecommunicators in the Burlington Fire Emergency Communications Centre have attained the required Fire Service Communications accreditation. The Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems (NFPA 1221) is an associated standard Fire 911 Communications service has adopted.

Significant Changes

2016

The Fire Public Safety Communications Centre moved into newly renovated space with state-of-the-art technology and equipment to ensure continuity of operations and readiness to respond to community calls for assistance.

2017

Front-line In-truck Mobile Data Terminals (MDT) were implemented to provide key incident information to emergency responders while enroute to an emergency. Such information supports improved situation assessment and informed decision making for quicker action to mitigate an emergency.

A new multimedia recording system was implemented to support a range of recording media (e.g. digital, analog, VoIP, P25 radio transmissions, text-to-911 interactions, video

DETAILED AUDIT REPORT

and picture images, console screens, etc.). The new system meets the current and future needs for Next Generation 911 communications requirements.

2018

Volunteer pager replacement to move from VHF system to the digital P25 Regional radio system.

A new computer-aided dispatch (CAD) system was recently implemented (October 2018). This system is a critical component of the call taking and dispatch processes supporting effective and efficient emergency response.

Fire 911 Communications recently extended its service coverage to include Halton Hills (November 2018). This service extension included the hiring of two additional full-time public safety telecommunicators; bringing day-shift coverage to three (3) public safety telecommunicators 24 hours a day 7 days a week.

Audit Objectives

The audit objectives were categorized along three (3) themes. This audit was conducted to assess the design and operation of controls to confirm:

- *Oversight & Communication* - Responsibilities are clearly understood and performed; complete, accurate, and timely reporting and resolution of operating issues and concerns; and access security (physical and logical).
- *Emergency Call Processing* - Dispatch of resources is within expected norms; communication occurs over reliable and secure networks; communication between on-scene agencies and telecommunicators meets expected norms and standards; and service can continue to operate during abnormal circumstances.
- *Telecommunicator Qualification* - Training and learning activities align with Burlington Fire Department priorities; quality of communications meets expected standards; and information is appropriately secured and protected.

Audit Scope

Specifically, the review focussed on:

- review of documents, recordings, and other relevant records for calls and incidents between 2016 – 2018;
- observation of emergency communication process; and
- interviews with sample of fire public safety telecommunicators and other relevant fire and agency persons.

The scope of the review specifically excluded:

- non-emergency call handling and processing;
- record management of emergency communications; and
- CAD and RMS application, processing and output controls.

DETAILED AUDIT REPORT

Role of Management & Inherent Risk

Management is responsible for designing internal controls to lessen the risks in the service or activity and to meet the following objectives:

- Safeguarding of assets (including reputation)
- Compliance with laws, regulations and corporate policies
- Reliability and integrity of financial and operational information
- Efficiency and effectiveness of operations.

Risk Category	Risk Magnitude	Risk Definition
Process	High	Loss arising from transactions processing or process management.
Performance & Responsibility	High	Loss arising from failure to demonstrate accountability for key responsibilities.
Systems Failure	High	Loss arising from disruption of business services
Telecommunication or Utilities Failure	High	Loss arising from disruption of essential utility service failures.
Community Trust/Confidence	Medium	Loss arising from an activity undertaken by the City or its representatives that will impair its image in the community or lower public confidence in it
Privacy & Confidentiality	Low	Loss arising from an authorized or negligent failure to meet a professional obligation to safeguard employee, citizen, and/or organizational information.
Efficiency	Low	Loss arising from inefficient processing
Disaster and Other Events	Low	Loss arising from loss or damage to physical assets and people from natural disaster or other events.
Safe Environment	Low	Loss arising from acts inconsistent with health or safety laws or agreements or from payment of personal injury claims.
Unauthorized Activity	Low	Loss arising from acts, involving at least one internal party, intended to circumvent regulations, the law or City policy.

DETAILED AUDIT REPORT

Legend:

High – significant/large/critical impact on City operations, financial results and/or image
Moderate – moderate/modest/sensitive impact on City operations financial results and/or image
Low – insignificant/little/subtle impact on City operations, financial results and/or image

APPENDIX 1 – DETAILED FINDINGS, RECOMMENDATIONS & MANAGEMENT ACTION PLANS

Audit Finding #1

Risk Category: Unauthorized Activity

Severity: Low

Oversight & Communication

Physical and Logical Access

What is happening?

Physical access to the communications centre is defined through a standard operating guideline (SOG) and controlled through a security card access system. The current access permissions allow 24/7 access to two (2) persons not included in the SOG; yet determined to require authorized access.

Logical access to systems is controlled through a combination of logon ID/passwords (system specific or active directory related) and role-based permissions (in the case of FDM/RMS). The IT Systems Coordinator (Fire) or CAD Application Analyst (Fire) are responsible for implementing access requests in accordance with IT policies and procedures. There is no guidance in place to describe how access to systems is to be granted; i.e. who has authority to grant/deny access requests and what permissions should be granted.

System permissions and access are not deactivated and/or changed when positions/responsibilities change. As a result, fire suppression personnel have access to systems without a current business need. Also, retired fire staff still have enabled profiles in the RMS system.

What is the impact?

Physical and logical access controls are preventive controls designed to discourage/disallow people from entering or accessing areas/systems where they are not permitted.

When physical and logical access controls are not designed or operating effectively, access to systems and/or premises without a business need may provide the opportunity for unauthorized use or inadvertent changes to information.

Recommendations:

Restrict access to the communications center to those positions identified in the SOG AND/OR amend the SOG to allow these two positions access AND/OR amend the SOG to provide an authorized person(s) with the ability to grant physical access to the communications center and such access is documented in writing by the authorized person(s).

Update existing guideline (1100-065) within Burlington Fire Department to approve/deny access to and permissions within systems including how the approval/denial is to be documented and coordinate with Information Technology to ensure these guidelines are followed when granting access to systems.

Oversight & Communication (continued)

Physical and Logical Access (continued)

Recommendations (continued):

Coordinate with IT to improve the current process to deactivate or change system access and/or permissions when staff in positions and/or responsibilities change. Implement the process with a review of current RMS users and deactivate in the system (based on system abilities).

Management Action Plan – Audit Finding #1

Comments: Agree

Action Plan: Working with ITS, look at improving the current process to change system access and/or permissions when staff positions or responsibilities change. The Change an Employee's Account and Conclusion of Employment IT forms will be reviewed and may be altered pending IT approval, supporting this audit recommendation.

Update the existing Security Access (1100-065) operating guideline as follows;

1. include HR representative and Fire Department Chaplain.
2. Outline who has the authority to grant system and physical access to the communications centre.

Responsibility: Manager Fire Administration and Communications

Target Date: Q2 2019.

Audit Finding #2

Risk Category: Performance & Responsibility

Severity: Low

Oversight & Communication

Standard Operating Guidelines

What is happening?

Standard operating guidelines (SOG) exist to support fire emergency communications; yet some are dated and contain information that is no longer relevant or does not reflect current situation/practice.

What is the impact?

Standard operating guidelines are a set of step-by-step instructions and/or documented processes to help staff carry out operations. SOGs are preventive controls to achieve efficiency, quality output and uniformity of performance, while reducing miscommunication.

When SOGs are out of date, there may be misunderstanding in operations.

Recommendations:

Establish a review schedule for SOGs based on priority of information to support regular review of SOGs for accuracy and relevancy of information.

Management Action Plan – Audit Finding #2

Comments: Agree

Action Plan: This work had already started prior to the audit being conducted. SOGs have already been updated or created in 2018, and this work continues into 2019. Some SOG reviews/updates were decidedly put on hold pending the recent changes in systems and personnel and service provided. Many SOG's take time to update and review due to multi-agency input and coordination to standardize a process. Of the 20 SOGs currently in distribution for fire communications, two (2) are pending review of other fire departments, eight (8) required review/update, and 10 are current to the existing procedure within the Centre.

Responsibility: Manager Fire Administration and Communications and Supervisor of Communications

Target Date: December 31, 2019

Oversight & Communication***Issue Identification, Tracking & Reporting*****What is happening?**

Issues can occur with people, process or technology. System-related issues are submitted through the City's IT Helpdesk software enabling tracking, notification of closure, and trend analysis. Other issues are communicated verbally or through email between either of the platoon chiefs or public safety telecommunicators and the supervisor. Email tends to be the primary method communication because of the shift work. The content of the emails varies depending on the issue and submitter. The supervisor began simple tracking of the requests in latter part of 2018. A standardized/formalized issue reporting process and feedback loop are not in place.

What is the impact?

Standardized issue reporting is key control to collect relevant information in a timely manner, support effective problem resolution and trend analysis. An issue log is a form of corrective control designed to correct issues, problems or irregularities that have been detected; the objective is to keep the issue, problem or irregularity in view until it is resolved.

When controls are not designed or operating effectively, there may be duplication of effort, miscommunication about issues and resolutions, issues resolution may be delayed, and/or issues may get lost. Accountability for problem resolution may not be appropriately established.

Recommendations:

Define and implement a standardized process and tools for reporting, tracking, recording resolution, and communicating to support trend analysis and information sharing for all service clients.

Management Action Plan – Audit Finding #3

Comments: Agree, this is also part of the QA program that is currently in the works.

Action Plan: To investigate tools or systems that could be implemented to improve the process for reporting, tracking and recording resolutions of issues. If funding is required for a solution, this will be submitted as part of the 2020 budget process for Council's consideration.

In the interim, an Excel spreadsheet has been set up in a restricted shared fire department folder for reporting, tracking and recording resolution of issues. This interim solution will remain in place until a long-term viable solution can be implemented.

Responsibility: Manager of Fire Administration and Communications

Target Date: Immediately for interim solution, as indicated above. July 2020, following budget approvals, for a long-term permanent solution.

Emergency Call Processing***Quality Assurance of Call Taking and Dispatch*****What is happening?**

Quality assurance (QA) is performed from call taking (initial and subsequent calls to report an emergency) to call dispatch (station alert and unit response) through to incident response (communication between incident command, units, other agencies and public safety telecommunicators). QA involves assessment of the audio and incident notes against established standards. The purpose of QA is two-fold: ensure the telecommunicator is performing as required, and identify opportunities for improving telecommunicator performance, communication operations, process, technology and processes/practices of other partners (e.g. suppression, prevention, etc.).

Technically, Fire 911 Communications is compliant with Section 7.7 of NFPA 1221 (Standard for the Installation, Maintenance, and Use of Emergency Services Communications Systems) because a standard operating guideline (SOG) exists and QA is performed on requested calls. The intent of the standard is not met because the SOG is dated with a last revision date of May 15, 2013, contains guidance or actions no longer relevant or that have changed, and is silent on parameters for the QA process (e.g. the percentage of calls to review, the frequency of the review, etc.).

The current QA approach focuses attention on structure fires and other calls (at request of the platoon chief or management) and minimal calls selected at random. The Supervisor listens to the audio, reviews the captured notes and assesses these against established standards. The evaluation is forwarded to the telecommunicator, as needed, for their input into the assessment. QA usually takes 10 to 60 minutes; however, can take up to a day, depending on the complexity of the incident.

The SOG requires the supervisor to maintain a list of QA work performed including the category of incident reviewed, the telecommunicator's name and a grading of: Met Standards or Did Not Meet Standards - Coaching Provided. This list is not being maintained and it can not be determined if the Supervisor has performed QA on calls handled by each Telecommunicator.

Fourteen calls were sampled for call taking and call dispatch to assess compliance with quality assurance standards.

- For call taking, only two calls were answered in compliance with the Processing Emergency Calls (Alarms) SOG. This SOG requires calls to be answered with "Fire 911, where is your emergency" because "the location is the most important piece of information to obtain from a caller." (NOTE: With the recent expansion of service to include Halton Hills, the SOG has been updated requiring telecommunicators to answer the calls with "Fire Emergency (911), for what city?"). The calls sampled answered only as "Fire Department" or "Fire Emergency".

Emergency Call Processing (continued)

Quality Assurance of Call Taking and Dispatch (continued)

What is happening? (Continued)

- For call dispatch, voice communication between public safety telecommunicators and incident command/responding units could be understood; although there are some occasions when the audio was unclear. In 5 of the 14 calls where incident communications were transcribed, information conveyed to the public safety telecommunicators from incident command or from responding units was repeated. There were a few instances when the word “copy” or words “copy that” were used without repeating back the information. This outcome is similar in the remaining 9 audio files listened to yet not transcribed. Also, there are instances, during large structure fires, when people are talking over one another. This situation makes it challenging for the public safety telecommunicator to hear.

What is the impact?

Quality assurance (QA) is a key detective control to identify what has and has not been done correctly and in compliance with procedures after the fact.

When the detective control is not designed or operating effectively, the opportunity to identify and acknowledge solid performance is missed; people-, process- and technology-related issues and problems are not identified for resolution and the quality of communications can decline.

Recommendations:

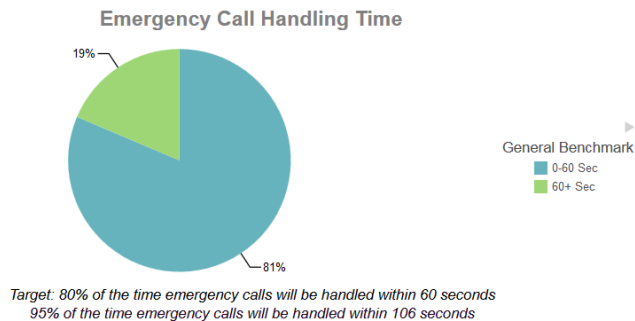
Update the quality assurance process with activities and parameters (e.g. frequency, number of calls to review, expected completion timelines, reporting requirements, etc.) required.

If adopting the APCO/NENA ANS 1.107.1.2015 Standard for the Establishment of a Quality Assurance and Quality Improvement Program for Public Safety Answering Points, then determine the capacity needed to complete the QA as designed and work with the Supervisor to ensure this time is built into schedules.

Management Action Plan – Audit Finding #4

Comments: Somewhat agree, non-emergency lines are answered “fire department”, while emergency lines are answer “fire emergency”. In November 2018, there was change made to how PSTs answer the fire emergency lines to ask for what city, due to the requirements of the new CAD system. The CAD system populates with the ANI/ALI information the majority of the time; however, the city/location is verified when the call in answered. As with any change in procedure, there is a time of adjustment for personnel. The Centre will continue to answer the non-emergency line with “fire department”, the Centre does not recommend that a non-emergency line be answered as an emergency line.

Action Plan: As previously mentioned, QA work has already started and was put on hold due to other time sensitive priorities and workload capacity in 2018. QA is done on an ongoing basis for major emergency calls and fire telecommunicator performance call handling times. The fire department was involved with phase one of the Business Intelligence (BI) dashboard build project, and telecommunicator performance measures dashboard was built as part of this initiative, which allows for individual or group performance times review on an ongoing basis. The QA/QI model being created supports best practice recommendations provided from APCO 1.107.1.2015 Standard (as outlined above). Performance times are also reviewed as part of a telecommunicators annual performance evaluation. NFPA 1221 is used to measure the Centre’s performance and is built into the dashboard as the establish performance target, screen capture of dashboard provided below for reference. In 2019, the focus of the work will be to align Burlington fire dispatch centre quality assurance to APCO best practice recommendations and to formalize the processes to ensure QA supports continuous improvement within the Centre.



Responsibility: Manager Fire Administration and Communications

Target Date: November 29, 2019

Emergency Call Processing***Business Continuity*****What is happening?**

In 2017, Fire 911 Communications identified the lack of a permanent secondary location for public safety communications as a risk. Throughout 2018, work was underway to create an alternate site to support service continuity in the event the primary site is deemed inoperable. The pace of development has slowed considerably during 2018 given other priorities including focus on new CAD implementation and providing fire dispatch service delivery to another municipality within the Region of Halton.

An evacuation box is prepared and maintained with the necessary materials needed for manual dispatching of calls from another location. The current arrangement with another public safety agency for use of space and systems/equipment is no longer feasible as systems/equipment are significantly different.

Evacuation of the center is a critical risk.

What is the impact?

A business continuity plan (including an alternate site for operations) is a preventive control designed to minimize the effects of a business disruption.

When a preventive control is not operating effectively, there would be considerable negative affect on the quality of service to the public and to the fire departments reliant on the center.

Recommendations:

Burlington Fire Department re-prioritize projects to put completion of the alternate site as the primary focus including updating the business continuity plan and establishing regular testing of the processes and systems (i.e. on-going operations).

Strong coordination with IT to ensure resources are available to support the technology work necessary to complete the alternate site and maintain the technology through its life cycle.

Management Action Plan – Audit Finding #5

Comments: Agree

Action Plan: Establish a permanent alternate location to provide fire dispatch service delivery with the least amount of disruption time. The alternate location will be established to support both long-term and short-term disruptions in service. This is the highest priority project for the fire department and has the support of IT services. The IT Workplan Roadmap also lists this as a priority project. Fire has two (2) IT personnel that will provide key support of this project through completion. Capital Works is also involved with the project to build out additional space and fit ups of room, excluding IT technology requirements. Funding has been approved for this project.

Responsibility: Manager Fire Administration and Communications

Target Date: December 31, 2019, or sooner.

APPENDIX 2 – ADDITIONAL OBSERVATIONS

Additional Observation #1

What is happening?

Burlington Fire Department, as operators of the Burlington Emergency Communications Center, has adopted NFPA 1061 Standard for Professional Qualifications for Public Safety Telecommunications Personnel in advance of the formal adoption by the Ontario Fire Marshal's Office in January 2020. In doing so, the standard requires the authority have jurisdiction¹ to establish several elements. One element, Section 4.1.2, requires minimum education and age requirements for public safety communications personnel.

Burlington made the decision in 2017 to have public safety telecommunicators certified setting the minimum education standard for the position. This minimum standard is not documented in a formalized document.

Recommendation:

Include the NFPA requirement in Burlington Fire Department career path document.

1. An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure.

Additional Observation #2

What is happening?

Burlington Fire Department platoon and acting platoon chiefs have responsibility for the communications center in the absence of the supervisor. While this responsibility is in keeping with the role of the platoon/acting platoon chief within the city, the details of what the responsibilities entailed were not consistently described by all positions. For example, actions to take in case of a systems failure, dealing with health and safety issues, etc.

Recommendation:

Manager and Supervisor to share audit recommendations with fire training supervisor and deputy to support officer development program to ensure continuity and consistency.

Additional Observation #3

What is happening?

There are standard operating guidelines and how-to's - all providing procedural information. The Manager and Supervisor have been working to complete a training manual since 2016. Their challenge to complete the manual is affected by other priorities and since the move to NFPA certification APCO resources are available for initial and ongoing training requirements. The various formats of procedural information may be redundant and time consuming to maintain.

Recommendation:

Adopt APCO training material as is and cease creation of the customized training manual.

Additional Observation #4

What is happening?

Training records are scanned into individual telecommunicator files (in secured folder on T:/ drive) and sent to Human Resources for inclusion in employees' physical personnel file. HR scans the training record and enters the information into Our Training Room. These practices create multiple instances of the same record which is inefficient in both time and storage space.

Recommendation:

Work with Human Resources to determine the optimal record management for training records ensuring both confidentiality and integrity of the records are maintained.

LEGENDS & INTERNAL AUDIT STANDARDS

Overall Audit Ratings	
Rating	Description
Excellent	<ul style="list-style-type: none"> • No internal control weaknesses noted. • Good adherence to laws, regulations, and policies. • Good control environment. • Operations are considered efficient and effective.
Good	<ul style="list-style-type: none"> • Several low and/or one or two medium findings. • Minor contraventions of policies and procedures with compensating controls in place. • No violation of laws. • Minor opportunities for improvement in efficiency and effectiveness.
Fair	<ul style="list-style-type: none"> • Many medium findings and/or one or two high findings. • Several contraventions to policy. • Minor violations of regulations/laws with minimal impact to City. • Moderate opportunities for improvement in efficiency and effectiveness.
Weak	<ul style="list-style-type: none"> • Several high findings and some medium and/or low findings • Controls weak in one or more areas. • Noncompliance with policies put the City at risk. • Violation of law/regulation put the City at risk. • Substantial opportunities for improvement. • Operations are considered consistently inefficient and/or ineffective

Audit Finding Severity Scale	
Severity	Details
High	<ul style="list-style-type: none"> • Residual risk is very high or high • Key control does not exist, is poorly designed or is not operating as intended • Serious non-compliance to policy or regulation • May result in immediate or material loss/misuse of assets, legal/regulatory action, material financial statement misstatements, etc. • Indicates a serious business control weakness/deficiency requiring immediate action
Medium	<ul style="list-style-type: none"> • Residual risk is medium • Key controls are partially in place and/or are operating only somewhat effectively • Some non-compliance to policy or regulation • May negatively affect the efficiency and effectiveness of operations and/or financial reporting accuracy. • Indicates a business control concern requiring near-term action be taken
Low	<ul style="list-style-type: none"> • Residual risk is low to very low • Key controls are in place, but procedures and/or operations could be enhanced. • Minor non-compliance to policy or regulation • May result in minor impact to operations. • Indicates a business control improvement opportunity for which longer-term action may be acceptable.

Audit Methodology

The audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing. The City Auditor relied upon interviews with and observation of key personnel, examination of information, data, and other documentary evidence and re-testing of controls.

Audit Conclusions

The conclusions reached in this report are based upon information available at the time. The overall conclusion is only applicable to the function/area of this audit. It reflects the professional judgment of the Office of the City Auditor based on a comparison of situations as they existed at the time against audit criteria as identified in the scope of the audit.

Reasonable Assurance

This conclusion is intended to provide reasonable assurance regarding internal controls. There are inherent limitations in any controls, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective controls may provide only reasonable assurance with respect to City operations.