

Criminal Justice Incentive Pay (CJIP) Audit Report 202324-17

October 17, 2024

Executive Summary

Section 943.22, Florida Statutes (F.S.), establishes the Salary Incentive Program, which provides financial incentives for full-time law enforcement officers; also known as the Criminal Justice Incentive Program (CJIP). CJIP is designed to provide a monthly supplemental salary payment to reward educational, training, and other career development activities that go beyond minimum position requirements. The Florida Department of Law Enforcement's (FDLE) Criminal Justice Standards and Training Commission (Commission) is responsible for establishing rules for the effective administration of the program.

Chapter 11B-14, Florida Administrative Code (F.A.C), describes the responsibilities of the Commission and establishes a structure for CJIP to facilitate the effective implementation and administration of pay incentives for law enforcement officers.

The Florida Department of Highway Safety and Motor Vehicles (Department) must submit annual reports to the Commission detailing CJIP compensation for full-time officers and is responsible for correct salary incentive payments.

CJIP payments range from \$20 to a maximum of \$130 per full-time officer per month. During the 2023 calendar year, the Department dispersed CJIP payments to full-time officers totaling approximately \$1,161,375.

The purpose of this engagement was to review and evaluate the Department's responsibilities concerning the application of CJIP supplemental payments and determine compliance with applicable laws and Department policy and procedure. Our review included Department practices for CJIP compensation from July 1, 2023 through May 1, 2024. We interviewed Department personnel and we reviewed Department policies and procedures and the process of completing and submitting the annual report. We also conducted testing of CJIP payment amounts and compared the accuracy of People First payments to the Commission's Automated Training Management System (ATMS).

We determined that directive controls should be improved to establish clear accountability for CJIP responsibilities. We noted there were no Department policies or procedures specifically addressing CJIP practices or the assignment of responsibilities for the preparation, review, and submission of the *Annual Salary Incentive Compensation Report* to the Commission. We also noted that Bureau of Accounting (BOA) management uses an outdated procedure that does not reflect current practices.



We recommend Florida Highway Patrol (FHP), BOA, and Bureau of Personnel Service (BPS) management communicate to ensure roles and responsibilities for CJIP are properly aligned within the Department's operational structure and are clearly documented. Documented policies and procedures should specifically address responsibility for:

- Preparing and submitting the *Annual Salary Incentive Compensation Report*;
- Receiving and reviewing training certificates and transcripts to support CJIP payments;
- Determining proper payment amounts; and
- Making changes to members' pay in the People First management system.

FHP, BOA, and BPS management agreed with the findings and recommendations and will begin implementing corrective action.

Background and Introduction

Section 943.22, F.S., establishes the Salary Incentive Program, which provides financial incentives for full-time law enforcement officers based on their educational attainment and career development training courses. Each employing agency shall annually submit reports to the Commission containing information relative to the compensation of full-time officers. The Commission is responsible for establishing rules for the effective administration of the program which include proper documentation and verification of the following:

- Any claimed training or education;
- Employing agencies provide salary structures and salary plans incentive payments for full-time officers; and
- Training received for purposes of salary incentive payments is job-related.

Chapter 11B-14, F.A.C., describes the responsibilities of the FDLE Criminal Justice Standards and Commission and establishes a structure for the Salary Incentive Program to facilitate the effective implementation and administration of pay incentives for law enforcement officers. This Chapter details the general program provisions of the Salary Incentive Program established in accordance with Subsection 943.22(2)(h), F.S., and:

- Establishes program requirements and outlines the verification and authorization processes;
- Specifies the awarding of credits for advanced training; and
- Lists Commission-approved federal or private training programs and hours awarded.



Additionally, this Chapter outlines the authorized salary incentive payments and eligibility criteria for full-time officers and establishes the criteria for basic, educational, and training salary incentives. Authorized salary incentive payments include:

- \$25 each month if employed before July 1, 1980, for completion of basic recruit training;
- \$30 each month for a 2-year degree (associate's degree or equivalent);
- \$80 each month for a bachelor's or higher degree (the maximum amount of educational salary incentive payments an officer may receive); and
- \$20 each month for each completed 80-hour unit of Commission-approved advanced or career development training.

The maximum aggregate incentive any officer can receive is \$130 per month.

According to Rules 11B-14.001(7) and 11B-14.001(10), F.A.C., the official repository of training records is the ATMS. ATMS generates a Global Profile Sheet (GPS) for each officer in Florida, which is a record of:

- Criminal justice officer employment;
- Salary incentive;
- Mandatory training;
- Certifications;
- Instructor topics;
- Examination records;
- Equivalency of training exemption; and
- Officer training.

Each year, the Commission sends out a memorandum to criminal justice agencies statewide advising them to complete the *Annual Salary Incentive Compensation Report* specifying the required due date.

Submission of Annual Report

The Department is required to submit an annual report to the Commission detailing compensation for full-time officers. The FHP Academy Commander coordinates with the Commission, the BOA's Payroll section, and BPS to review current members' CJIP payment amounts, and then reconciles the payment to the ATMS GPS, and related training and education records, to complete the annual report. If exceptions are noted, the FHP Academy Commander follows up with individual members by phone or email and verifies any training or education not included or listed in the BOA-Payroll, BPS, FHP Academy, or ATMS records. The Department is responsible for adjusting salary incentive pay for members. The Commission has the authority to conduct an audit and rectify any changes to the report.



The report includes a signature page that is signed by the FHP Academy Commander (as the Agency Administrator) and the BOA Bureau Chief (as the Fiscal Officer). The FHP Academy Commander is also responsible for reviewing the report. The completed signature page, GPS sheets, and supporting documentation are mailed to the Commission.

The Department policies and procedures do not adequately address the assignment of responsibility for the preparation and submission of the *CJIP Annual Salary Incentive Compensation Report* to the Commission.

Program Policy Guidance

OIG staff conducted interviews with BOA and FHP personnel performing CJIP pay supplement administrative and managerial functions. We also reviewed Department policies and procedures to determine whether controls are in place to prevent fraud and or/abuse within the process; whether members' roles, responsibilities, and tasks are clearly defined; and whether policies/procedures adequately address CJIP program practices.

According to the FHP Academy Commander, there is no guidance specifically addressing the responsibility and activities for preparing and submitting the *CJIP Annual Salary Incentive Compensation Report* to the Commission. The annual requirement was only discovered after a Commission Field Representative inquired about the report's completion.

Currently, the FHP Academy Commander coordinates with the Commission, the BOA's Payroll section, and BPS to review current members' CJIP payment amounts and reconciles them to ATMS reports, training/education records, and submits the GPS reports, training certificates, and transcripts to BOA's Payroll section for payment.

BOA's Payroll section mentioned they process approximately 20 CJIP supplement payment adjustments monthly in People First. Bulk changes can occur when an Academy class graduates. Payroll personnel documents the education course taken and adjusts the payment amount on an *FHP Report of Personnel Action - State Law Enforcement Officers' Salary Incentive Program* form and submits it to Personnel which is retained in the members' file.

BOA Payroll personnel are responsible for:

- Receiving and validating documentation from FHP to support CJIP payments;
- Determining the proper amount;
- Making changes to members' CJIP pay in People First; and
- Processing the payroll.



The Payroll section utilizes Procedure AP-003 - *Criminal Justice Incentive Pay* as an overall work aid. We noted the procedure contains information inconsistent with the program practices. Payroll has no access to the Commission's ATMS system to validate information, rather, they rely on the FHP Academy to provide ATMS GPS and copies of training certificates/transcripts to document completed education and training.

Additionally, the process for ongoing revisions and adjustments to members' CJIP pay is not defined in Department policies or procedures. For example, dozens of members' CJIP pay might be adjusted as a recruit class graduates from the FHP Academy, or for individual members as they obtain qualifying education or training throughout the year.

The roles, responsibilities, and tasks of Department members responsible for CJIP practices are not clearly defined in current policies and procedures.

CJIP Payment Review

Our review included an analysis of a sample of 50 Department full-time officers to determine whether payments documented in People First are accurate and commensurate with education, training, and maximum eligible salary incentive amounts documented in ATMS. Our review noted one instance where a member's CJIP amount was not adjusted despite Payroll notifying the member they would receive a CJIP-related pay increase. Payroll personnel remedied this exception when it was brought to their attention.

Conclusion

We determined the Department could improve directive controls of CJIP by formally assigning responsibility for related functions and implementing enhanced documented policies and procedures.

Findings and Recommendations

Improved CJIP Directives

Finding No. 1: Directive controls should be improved to establish clear accountability for CJIP responsibilities.

Subsection 943.22(2)(i), F.S., *Salary Incentive Program for Full-time Officers*, and Rule 11B-14.005(1), F.A.C., *Salary Incentive Program*, require employing agencies to annually submit to the Commission an *Annual Salary Incentive Compensation Report* that contains information relative to the compensation of full-time officers.



Subsection 943.22(2)(j), F.S., *Salary Incentive Program for Full-time Officers*, and Rule 11B-14.005(1), F.A.C., *Salary Incentive Program*, state the employing agency shall be responsible for the correct salary incentive payment to full-time officers.

Our review noted there were no Department policies or procedures specifically addressing CJIP practices or the assignment of responsibility for the preparation, review, and submission of the *Annual Salary Incentive Compensation Report* to the Commission.

Additionally, we noted that the existing BOA procedure, AP-003 - *Criminal Justice Incentive Pay*, does not reflect current practices. BOA management characterized this document as a work aid and stated it was outdated.

Finally, we noted that all other pay supplements and related changes for the Department are entered into the People First management system by BPS personnel and documented using Personnel Action Request (PAR) forms. According to BOA and BPS management, the Payroll section has performed these responsibilities since approximately 2016.

Absent directive controls that require and encourage members to carry out their duties and responsibilities in a manner that fosters a favorable control environment, the Department's exposure to related risks is increased; for example:

- Missing or untimely submission of the annual report to the Commission;
- Key elements of the pay process for CJIP payments may not be dispersed according to management's operating standards; and
- Members may not receive appropriate CJIP payments.

Recommendations

We recommend FHP, BOA, and BPS management communicate to ensure roles and responsibilities for CJIP are properly aligned within the Department's operational structure and are clearly documented. Documented policies and procedures should specifically address responsibility for:

- Preparing and submitting the *Annual Salary Incentive Compensation Report*;
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Management Response

The agency agrees with the recommendation that directive controls should be improved to establish clear accountability for CJIP responsibilities. The Bureau of Accounting, the Bureau of Personnel, and the FHP Training Academy will work together to develop a written procedure and workflow to establish responsibilities and ensure the continuity and completion of CJIP processes.



Purpose, Scope, and Methodology

The purpose of this audit was to review and evaluate the Department's responsibilities concerning the application of CJIP supplemental payments and compliance with applicable laws and Department policy and procedure.

The scope of this audit included the Department's administration and management of CJIP supplements for the period of July 1, 2023, through May 1, 2024.

The methodology included:

- Reviewing applicable statutes, rules, manuals, and procedures;
- Interviewing appropriate Department personnel and gaining an understanding of current operations, functions, and responsibilities;
- Reviewing Department policies and procedures; and
- Reviewing a sample of current CJIP payments and comparing payments to members' eligibility based on education and training documentation and records.

Acknowledgment

We would like to thank BOA and FHP personnel who assisted during the audit and express our appreciation for their cooperation during the course of our examination.



Distribution, Statement of Accordance, and Project Team

Distribution

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Statement of Accordance

Section 20.055, Florida Statutes, requires the Florida Department of Highway Safety and Motor Vehicles' Inspector General to review, evaluate, and report on policies, plans, procedures, accounting, financial, and other operations of the Department and to recommend improvements. This audit engagement was conducted in accordance with applicable *International Standards for the Professional Practice of Internal Auditing* published by the Institute of Internal Auditors and *Principles and Standards for Offices of Inspector General* published by the Association of Inspectors General.

Project Team

Engagement conducted by:
Calvin Grissett, Auditor

Under the supervision of:
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Approved by:


Mike Stacy, Inspector General

ATTACHMENT - Management Response



Dave Kerner
Executive Director

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MEMORANDUM

DATE: October 4, 2024
TO: Kim Butler, Assistant Audit Director
FROM: Major Kelly Hildreth *Kelly*
SUBJECT: Management Response to the Criminal Justice Incentive Pay (CJIP) Audit (202324-17)

The following is our response to the findings and recommendations presented in the report.

Finding 1: Directive controls should be improved to establish clear accountability for CJIP responsibilities.

Recommendations

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