

REPORT TO
THE NEW YORK CITY COMMISSION
TO COMBAT POLICE CORRUPTION



THE NEW YORK CITY POLICE DEPARTMENT
RANDOM INTEGRITY TESTING PROGRAM



This document was prepared by:

Richard Girgenti - Principal

Michael Boxer - Managing Director

Jill Konviser - Manager

Sean Woods - Senior Consultant

Daniel Pisculli - Manager

Gianluca Romano - Senior Consultant

Matthew Carbone - Consultant

Andrew Saland - Consultant



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I. BACKGROUND

KPMG Peat Marwick LLP (“KPMG”) was engaged by the New York City Commission to Combat Police Corruption (“Commission”) to assist the Commission in reviewing the New York City Police Department’s (“NYPD”) integrity testing program.¹

Specifically, KPMG’s objective was to assess whether the random testing program was achieving the goals set by NYPD for the program. Initially, to accomplish this objective, KPMG sought to:

- Determine and clarify the objectives of the random testing program.
- Determine whether random tests were administered in accordance with NYPD Internal Affairs Bureau (IAB) procedures.
- Obtain information from experts in the field of integrity testing about the perceived strengths and weaknesses of NYPD’s current random integrity testing program.
- Issue a report to the Commission.

During the early stages of our work, we concluded that the second step - determining whether random tests were administered in accordance with IAB procedures - could not be accomplished as planned. We discovered that procedures appearing in various IAB documents and first explained as requirements, were, in fact, merely guidelines. In addition, we found that in some cases, different IAB groups may approach testing in somewhat different ways. Nonetheless, the work performed in reviewing IAB’s procedural guidelines and in analyzing a sample of random tests, provided KPMG with valuable insight into the operation and administration of the random testing program.

¹ The NYPD’s integrity testing program consists of both random and targeted integrity tests. A random test is designed to test any police officer who responds to the particular test, while a targeted integrity test, usually a more elaborate plan, is designed to test a specific officer.

As determined by interviews and documents provided by NYPD, the four objectives of the random integrity testing program are to:

- Create an additional anti-corruption tool in an effort to identify and catch corrupt police officers.
- Create a more comprehensive corruption barometer by providing at least a limited analysis or measurement of corruption within the Department.
- Create an environment of omnipresence by IAB where each assignment handled by an officer would be viewed as a potential integrity test.
- Identify training needs and communicate these needs for appropriate follow up.

In performing our review, we developed criteria, both quantifiable and qualitative, to evaluate individual tests. KPMG selected, reviewed and analyzed a representative sample of 40 random tests that were conducted in the first six months of 1996. We reviewed case files, video and audio tapes and relevant IAB documents and statistics. We further reviewed certain targeted tests for comparison purposes and conducted interviews with policing and integrity testing experts both inside and outside the Department, including present and former NYPD Commissioners and Deputy Commissioners, Chiefs of NYPD Internal Affairs, Federal and State Prosecutors and academicians.

II. INTEGRITY TESTS

Integrity testing has long been an element of NYPD's anti-corruption efforts. Prior to the reorganization of IAB in 1993, however, the Department conducted these tests on a relatively limited basis. Following the Mollen Commission report in July, 1994, IAB developed and implemented its current random testing program as an adjunct to the targeted testing program that was already in existence.

The random testing program has continued to evolve since its inception in 1995. IAB developed and implemented this unique program, going well

beyond what had been attempted by any other police department. It represents a substantial attempt to enhance integrity within the agency.

KPMG and the Commission contacted 44 of the major law enforcement agencies in the United States (5 federal, 37 state and 2 county) to determine what, if any, random integrity testing was being conducted outside of New York City. Of the 43 agencies that responded, only one, the Baltimore City Police Department, reported that it conducted any random testing at all. However, Baltimore's random testing program was fashioned after the NYPD program, and the number of random tests it expected to conduct during 1996 was considerably fewer, on a per capita basis, than the number conducted by NYPD. Unlike NYPD, Baltimore conducted more targeted tests than random tests.

IAB defines an integrity test as involving "the creation of an artificial situation or condition which is designed to provoke a reaction by the subject of a test. The subject is allowed the complete freedom to perform, or fail to perform, in a manner consistent with department and legal guidelines." More specifically, an integrity test, either random or targeted, is a test of an officer's response to a typical police situation, created by IAB to observe and evaluate the honesty, integrity and overall conduct of the officer.

In 1995, the first year of the random testing program, an officer was recorded as failing either a random or targeted test when, during the course of the test, the officer committed a criminal act. If no such act was committed, the officer was recorded as having passed.

Beginning in 1996, two degrees of failure were established: criminal and procedural. The commission of a criminal act during the course of either a random or targeted test was recorded as a "criminal" failure. A failure was recorded as "procedural" when the tested officer, while not committing a criminal act, failed to perform his/her duty in accordance with Departmental procedures or guidelines. Criminal failures result in referrals to the appropriate District Attorney's Office for prosecution,² while procedural failures result in either Departmental action, or, in cases where they are extremely minor, are

² Cases in which the District Attorney's Office declines prosecution are pursued by the Department administratively, but are still considered, by the Department, to be criminal failures.

considered training issues.

Targeted tests are conducted in response to suspicions or allegations of wrongdoing or corruption against a particular officer and, in terms of resources and design, are generally more complex and elaborate than random tests. Following concerns over the level of corruption within NYPD in the wake of the Mollen Commission's report, IAB implemented an innovative random testing program to supplement its targeted testing.

Random tests, unlike targeted tests, are not initiated as a result of suspicions or allegations against particular officers. Rather, random tests focus on corruption trends, often involving specific commands or geographic locations. They are designed and implemented to create a responsive, flexible, less intensive and more cost-effective method of testing the general population of police officers. Since random tests are less elaborate than targeted tests, they can be conducted more easily, and, therefore, can be administered more frequently. Both random and targeted tests are divided into three levels of complexity: alpha (least complex); beta (middle level complexity); and gamma (most complex).

IAB is divided into 18 groups, of which 16 conduct integrity tests as part of their overall responsibilities. Of the groups which do testing, 11 cover specific geographical areas and five conduct tests city-wide. Group 52, the only group whose primary function is to conduct integrity tests, carried out 144 of the 355 random tests that were performed during the first six months of 1996. By June, 1996, IAB had conducted at least one random test during each of the three daily tours of duty in every precinct in the City.

In 1995, the first year in which random tests were performed, 1,049 police officers were tested in 471 random tests. There was one criminal failure. However, the District Attorney's Office declined to accept the case for prosecution. During our sample period, the first six months of 1996, 355 random tests were conducted, testing 762 officers. There were no criminal failures and seven procedural failures.³

³ This report focuses only upon non-procedural failures.

By comparison, in 1993, the Internal Affairs Bureau conducted 28 targeted integrity tests of 57 officers. There were five failures. In 1994, the number of targeted tests increased to 115, testing 186 officers, resulting in 35 criminal failures. In 1995, 96 targeted tests were conducted, resulting in 10 criminal failures, with the District Attorneys' Offices accepting five for prosecution. During our sample period, 45 targeted tests were conducted, testing 64 officers. There were 12 criminal failures and one procedural failure. Of the 12 criminal failures, the District Attorneys' Offices accepted six for prosecution, declining to prosecute the remaining six.

The following table highlights significant integrity testing data:

	1993	1994	% Change + / (-)	1995	% Change + / (-)	1/1/96 6/30/96	* % Change + / (-)
Targeted (T) tests	28	115	311	96	(17)	45	(6)
Random (R) tests	0	0	-	471	-	355	51
T police officers tested	57	186	226	176	(5)	64	(27)
R police officers tested	**	**	-	1,049	-	762	45
T police officer*** criminal failures	5	35	600	10	(71)	12	20
R police officer*** criminal failures	**	**	-	1	-	0	(100)

* Based on projected annual figures being double the half-year figures.

** Not applicable.

*** Not all criminal failures were accepted for prosecution by the District Attorneys' Offices.

III. KPMG'S APPROACH AND METHODOLOGY

In order to determine and clarify the objectives of the random testing program, KPMG interviewed senior IAB personnel and reviewed relevant program materials and documentation. Once these objectives were determined, KPMG selected a representative sample of completed random tests in order to review their planning, execution and administration.

In selecting our sample, we identified and accounted for ten variables that could potentially impact test results, including: (1) degree of test complexity; (2) group conducting the test; (3) location; (4) tour; (5) type of property involved; (6) amount of currency involved; (7) use of 911 to initiate tests; (8) number of officers tested in the test scenario; (9) use of an undercover as part of the testing scenario; and (10) type of test scenario.

KPMG then selected a representative sample of 40 completed random tests, conducted between January 1, 1996 and June 30, 1996, that reflected a similar distribution of the ten variables to that in the universe of IAB's random tests. Obviously, tests beyond the 40 selected or standing outside of our test period were not factored into our results.

KPMG staff reviewed the case files for our sample. In addition, when available, we reviewed the corresponding video and audio tapes. For the 40 tests in the sample, there were 35 videotapes and 24 audio tapes.

As a framework for our review, KPMG developed a checklist (see Exhibit 1) based upon interviews with IAB staff and upon our analysis of documents received from IAB. The checklist consisted of approximately 100 questions addressing such areas as test results, planning, execution and documentation of the test, test participants and other pertinent information. For each random test reviewed, KPMG completed and analyzed the checklist.

As part of this analysis, KPMG attempted to identify differences between the random and targeted tests that could account for the difference in failure rates. KPMG also analyzed IAB's data for all tests, both random and targeted, conducted in the first six months of 1996. We identified the number of tests in each group initiated by a 911 call and in which more than one officer was tested. KPMG then analyzed this data in an attempt to identify trends in the level of testing complexity, the amount of currency and the number of tests conducted in geographic areas with a high number of civilian complaints alleging corruption.

IV. ANALYSIS

A. Random testing as an additional anti-corruption tool

The random testing program was designed as an additional anti-corruption tool to supplement other anti-corruption efforts. Specifically, we were told that one of the ways random testing would achieve this objective was by identifying and weeding out corrupt police officers.

Of course, it is also possible that random testing could serve as an anti-corruption tool in another way, by providing a deterrent to potential corrupt activity. Indeed, one possible explanation offered by a high ranking IAB official for the lack of criminal failures was the possibility that the integrity testing program was effectively deterring corruption. However, since another of the stated objectives of the program was to create a sense of omnipresence, we have chosen to discuss deterrence in the section of this report that deals with that objective. Thus, for purposes of this section, we have looked only at whether random testing has served as an anti-corruption tool in identifying and weeding out corruption. In this regard, the program has not achieved its first objective.

Since its inception in 1995, through June 30, 1996, 826 random tests, testing 1,811 officers produced only one case referred to the District Attorney for prosecution. In that case, the District Attorney declined prosecution. By contrast, during the same period, 141 targeted tests, testing 240 officers, resulted in 22 failures referred to District Attorneys' Offices, with 11 accepted for prosecution.

To understand this disparity in results, KPMG attempted to discern the differences between the design and execution of random and targeted tests and found at least six significant differences. These differences were: (1) tailoring test to subject; (2) test complexity; (3) subject isolation; (4) test initiation; (5) subject interaction with test stimuli; and (6) amount of currency. The fact that these differences exist between random and targeted tests is clear. However, the precise impact that these differences have on the probability of a test failure is not as clear.

1. **Tailoring of Tests** — The suspicions or allegations of corruption that led to targeted testing allowed for the tailoring of test procedures. In random tests, this was not the case.
 - The officers tested in random tests, unlike the subjects of targeted tests, were not chosen on the basis of previous suspicions or corruption allegations.
 - Targeted test scenarios were tailored specifically to the type of corruption suspected or alleged. Random test scenarios, while tailored to specific precincts, tours and allegations of suspected corrupt activity within commands, could not be similarly tailored to their subjects.

2. **Complexity of Tests** — Random test scenarios were generally less complex and less sophisticated than targeted tests.
 - During the first six months of 1996, 3 percent of random tests were classified as gamma tests, i.e., most complex.
 - During the same period, 36 percent of targeted tests were classified as gamma tests, i.e., most complex.

3. **Isolation** — Officers in random tests were less frequently tested in isolation than were the subjects of targeted tests. Random tests did not often result in an officer being alone when presented with an opportunity to engage in corruption.⁴
 - During the first six months of 1996, an officer was tested alone in 18 percent of random tests.
 - During the same period, an officer was tested alone in 67 percent of targeted tests.

4. **Tests Initiated by 911 Calls** — Unlike targeted tests, the majority of random tests were initiated by 911 calls. While the use of 911 to initiate random tests would be difficult to avoid, tests so initiated alerted other officers, drawing them to the scene, and necessarily creating a record of those officers who responded.

⁴ The following percentages are based upon data provided by IAB. However, we were informed by IAB that during some tests, additional officers may have arrived on the scene but were not counted as having been tested.

- During the first six months of 1996, 72 percent of random tests were initiated by 911 calls.
 - During the same period, 16 percent of targeted tests were initiated by 911 calls.
 - In 10 of 40 random tests reviewed, other officers arrived at the scene after the first officers responded. In each of the ten instances, the test was initiated by a 911 call.
5. **Interaction with Test Stimuli** — In targeted tests, it appeared that the tested officer noticed the cash, simulated narcotics, property or other test stimuli more often than in random tests. If the subject was not sufficiently participating in the scenario, or was unaware of the existence of the testing stimuli, the subject was not tested for corruption in any meaningful way.
- In each of the five targeted tests reviewed, the targeted officer appeared to notice the test stimuli.
 - In 15 of the 40 random tests reviewed, the tested officer did not appear to notice the test stimuli.
 - In several random tests, the tested officer did not fully participate in the test scenario, i.e., did not leave the patrol car or merely asked perfunctory questions before leaving the scene.
6. **Amount of Currency** — Targeted tests, as compared to random tests, generally used currency of a greater value as a corruption test stimulus. Experts interviewed varied in their opinions as to whether the more valuable the test stimuli, the greater the likelihood that a potentially corrupt officer would engage in corrupt activity.
- During the first six months of 1996, more than \$500 was used in each of 58 percent of the targeted tests in which currency was used. In random tests, it was 15 percent.
 - During the first six months of 1996, an average of \$1,834 was used in each of the 21 targeted tests that involved currency. The largest and smallest amounts used in these tests were \$10,000 and \$130, respectively.

- During the first six months of 1996, an average of \$479 was used in each of the 296 random tests that involved currency. The largest and smallest amounts used in these tests were \$3,480 and \$5, respectively.

B. Random testing as a more comprehensive corruption barometer

The second objective of the random testing program was to provide a more comprehensive barometer of corruption. In this regard, we have found that the random testing program did not achieve this objective and, as currently constituted, does not provide a measurement of corruption in the Department.

- Over 800 tests of more than 1,800 police officers have produced only a single case of what the Department considered to be corrupt activity. However, even that case was rejected for prosecution by the District Attorney's Office. These results alone call into question the validity of the random testing program as a barometer of corruption. Unless one were to hold the view that NYPD is a corruption free agency, the testing program cannot be seen as a meaningful measure of Department-wide corruption.
- Moreover, test subjects were not randomly selected. Rather, the testing sample was the by-product of Departmental analyses of corruption trends, targeting specific precincts and geographic areas. Thus, even if the tests had yielded results, they could not provide a basis on which to generalize about the level of corruption throughout the entire Department.
- It is doubtful that any mechanism or testing device can reveal the actual level of corruption that exists in the Department. As in measuring crime statistics, programs such as random testing can no more measure actual levels of corruption than crime reports can measure actual levels of crime.
- What a well designed random testing program can provide is a tool for discerning trends in levels of honesty or corruption in the same way as uniform crime reports reflect trends in levels of criminality.

- To achieve even this more limited goal, integrity tests, though never intended by the Department to be truly random, would have to be both random and standardized, with the stimulus that would prompt a failure being relatively constant. If these requirements were satisfied, meaningful comparisons on a year to year basis would be possible.
- The Department may wish to consider if a more realistic corruption measurement tool needs to be created or if the resources needed to develop such a tool might be better spent on other deterrence and investigative efforts in addressing the issue of police corruption.

C. Random testing as a way of establishing a sense of omnipresence

The Department's third objective, creating a sense of IAB's omnipresence, was designed to have each officer believe that every assignment might be an integrity test.

Given the limited scope of KPMG's engagement, no attempt was made to determine whether random integrity testing created this sense of omnipresence. Similarly, no attempt was made to determine the program's deterrent effect, if any. While it might be a fair assumption that such an effect is being achieved, surveys and focus groups are the only real ways to know whether this objective is being met. We did, however, make a number of observations for consideration by the Commission:

- From January 1, 1995 through June 30, 1996, IAB tested more than 1,800 officers in over 800 random tests. At least one random integrity test was conducted on every tour in every precinct. Assuming that this intensive level of testing is effectively publicized throughout the Department, it has great potential for creating a sense of omnipresence. On the other hand, the fact that only one officer has failed a random test, with that one case rejected for prosecution by the District Attorney, could just as easily undermine this desired effect.
- Currently, IAB relies exclusively on anecdotal information to assess whether the random testing program has achieved a sense of omnipresence. It has not developed any method to measure the deterrent effect, if any, of the program.

- The anecdotal evidence derived from KPMG's own limited interviews was mixed. While we were told that some officers believe that they have been tested when, in fact, they have not, we were also told that random tests were transparent and easily identifiable. While some officers believed that the program had some beneficial effect, others stated that very few took it seriously. Thus, sole reliance upon anecdotal information did not permit a proper assessment of whether the objective of omnipresence was being achieved.
- Whether the desired sense of omnipresence requires the current level of testing, or whether it can be achieved by a reduced testing effort and an effective publicity program, is a question for further consideration by the Department.

D. Random testing as a means for identifying patrol force training needs

Through its random testing program, IAB, as its fourth objective, aimed to identify patrol force training needs and to communicate these needs for appropriate follow up.

Identifying training needs is an important objective. However, while the Department has already taken a number of meaningful steps, given the number of tests conducted and the number of officers observed, it can do more to maximize the training opportunities presented by the random testing program.

- Through its random testing program, IAB has observed more than 1,800 officers responding to various scenarios. IAB intended, as a result of its testing, to identify training needs in the patrol force and to transmit them to the Police Academy and to Precinct Commanding Officers for incorporation into existing training materials.
- In our interviews with IAB, we were told that IAB Group Commanding Officers made informal recommendations regarding training needs to Precinct Commanding Officers. However, IAB did not maintain a record of these recommendations.

- KPMG was informed that for the seven procedural failures during our test period, test results were sent to command officers for disciplinary action against the officers in question.
- KPMG is aware of two IAB internal memoranda generated as a result of random integrity testing. The first related to a lack of uniformity among different Bureaus within NYPD, resulting in the failure to comply with Department procedures relating to the vouchering of found property. The second directed IAB Group Commanders to brief their counterparts in the Transit and Housing Bureaus on corruption issues impacting their respective Commands.
- We were informed that IAB made a presentation to each class of newly promoted Sergeants, Lieutenants and Captains in which random testing videotapes were used to demonstrate ways in which supervision could be improved.
- KPMG learned that IAB trained all Integrity Control Officers (ICO), assigned to various commands, on issues identified from random tests conducted in the ICO's particular commands. Two hours of training was devoted to issues identified during random testing.
- Our review found that IAB lacked written procedures relating to the recording and communication of training needs.
- In KPMG's review of IAB guidelines, we did not identify any reference to the identification, documentation or transmission of training needs.
- Of the 40 case files reviewed, we did not find any record that training concerns were considered either during or after each test.
- None of the Departmental forms that we observed in the case files required that training concerns be identified and documented.
- IAB did not have a designated training coordinator or liaison through which all identified training needs were reviewed, documented and transmitted.

E. IAB procedural development

Our review, including the analysis of the case folders in our sample, highlighted a number of opportunities for improvement in both the administration and implementation of the random testing program.

First, IAB did not have a single, comprehensive, integrated procedures manual for integrity testing. Various procedural issues are discussed in a number of documents and memoranda. Nowhere, however, are procedures comprehensively set out in one document, covering essential aspects of test planning, test execution, post-test requirements and post-test evaluation, and, most important, defined as requirements as opposed to guidelines or recommendations. The creation of such a procedures manual would establish minimum requirements for field personnel and their supervisors, and would provide an essential management tool for administering the program.

In KPMG's review of case folders, significant planning documents, while present in the majority of cases, were not always found. Included among these were tactical plans, tests scenarios and site surveys, all documents considered fundamentally important by IAB officials. IAB may wish to consider a policy that no test be conducted without these important planning documents being completed and made a part of the case file.

Additionally, in a number of cases, the operation of technical equipment such as video cameras and tape recorders, demonstrated a need for additional training. In some cases, video quality was so poor as to be unusable, while procedures followed in producing audio tapes were less than adequate.

Finally, the post-test critique, as defined by IAB, could not be found in almost any file reviewed. That critique is defined by IAB as an analysis to identify problems and areas for improvement, that allows IAB to benefit from the experiences, and even the mistakes, of past tests. Simply recording the results of a test, as was the case in the test files reviewed, does not serve the same function. The importance of this review should not be minimized if the random testing program is to continue to improve.

V. CONCLUSION

In reviewing NYPD's random integrity testing program, it is apparent that the Department has been both proactive and creative in its anti-corruption efforts. It has designed and carried out a program that goes well beyond that attempted by any other major police department. The commitment of manpower and financial resources, together with the energy and dedication of IAB personnel and senior Department officials, is substantial.

NYPD's four objectives for the random testing program are appropriate and sound, and have provided a framework for our evaluation. The following summarizes our views on these objectives.

Random testing as an anti-corruption tool

The first objective of the random testing program was to provide an additional anti-corruption tool by identifying and weeding out corrupt police officers. The program has not accomplished this objective.

The carrying out of hundreds of random integrity tests of patrol officers, performed by NYPD personnel dedicated to and trained for this role, would seem to be a reasonable tool for combating corruption. However, one must question whether a program, which has conducted more than 800 tests with only one non-procedural failure, and that one rejected by the District Attorney, is an effective anti-corruption tool. We recommend that the Department reassess and refocus its approach. Included in this reassessment is the level of resources, both in manpower and financial terms, that the Department should continue to dedicate to the program.

In light of the program's lack of success as an anti-corruption technique, a number of options might be considered. First, the Department can attempt to recast the current program by addressing those areas for improvement set out in this report, along with those that can be developed by IAB itself. Second, the Department might redirect its focus to proven techniques including a greater emphasis on targeted tests and on well planned and executed investigations. Finally, a combination of approaches, with random testing having a continuing, but reduced role, could be implemented.

Random testing as a more comprehensive corruption barometer

As currently constituted, the random integrity testing program does not provide a measurement of corruption in the Department. The random testing program's lack of results calls into question the validity of the program as a barometer of corruption. Moreover, test subjects were not selected in a random manner that could yield valid measurement results relating to the entire Department.

It is doubtful that any mechanism or testing exists, or could be designed, to test for the actual amount or measure of corruption in the Department. It is possible that integrity tests could be developed to measure how well those tested performed compared to those tested in the year before. Of course, these tests would have to be both truly random and standardized. The stimuli that would prompt a failure would have to be relatively constant. Otherwise, year to year comparisons would be meaningless.

This type of integrity testing program can no more measure actual corruption than crime reports can measure actual amounts of crime. Rather, it could provide a tool for discerning trends in honesty or corruption in the same way that uniform crime reports or National Victim Surveys plot trends in criminality.

As a management tool, attempting to develop a measure of corrupt activity is a worthwhile goal. Consideration should be given to other testing models.⁵ However, hard questions must be asked and addressed on the basis of available resources. Should the Department devote limited resources to developing a better management tool for measuring results of random integrity testing or should the Department commit these and/or additional resources to developing investigative efforts designed to identify and root out actual corruption? It is essential that the Police Commissioner and Departmental executives, on a cost/benefit basis, determine whether a random testing program, as extensive as the one that currently exists, should be modified or replaced.

⁵ One such model is the Systematic Testing and Management Program (STAMP) proposed by Professor Laurence Sherman of the University of Maryland. We have not attempted to study the effectiveness of the STAMP model and, therefore, mention it for purposes of illustration and not as a recommendation of this report.

Random testing and the establishment of a sense of omnipresence

Regarding IAB's success, through random testing, in accomplishing its third objective, the instilling of a sense of omnipresence in the patrol force, neither KPMG nor NYPD can provide a definitive answer. There is simply no hard information from which a conclusion can be drawn. Only anecdotal information exists and that information cuts both ways. What we can say, however, is that the program's lack of results must inevitably undermine the deterrent effect of whatever sense of omnipresence IAB has, in fact, created.

It would seem a fair assumption that integrity testing, whether random or targeted, does have a deterrent effect on police corruption, with the element of omnipresence playing a significant role. The Department will only really know if this is the case through the use of techniques such as focus groups and surveys, steps that were beyond the scope of KPMG's engagement.

Moreover, whether the achievement of this important objective requires the current level of testing, or can be achieved by a reduced testing effort together with an effective publicity program, is a question that should be considered further.

Random testing to identify patrol force training needs

The random testing program can provide a significant resource from which to identify patrol force training needs. The benefits that can be derived from observing over 1,800 test subjects, along with other officers responding to the scene, performing their duties and complying with Departmental rules and procedures, cannot be minimized. While efforts have been made to date, IAB can do more to maximize the potential benefits that clearly exist and more fully meet this objective of the program.

* * *

In instituting changes in the future, it is very possible that a random testing component will continue to be a part of any anti-corruption program employed by NYPD in the future. Therefore, we recommend that the oppor-

tunities for improvement, regarding the training of IAB personnel and the strengthening of IAB procedures discussed in this report, be considered. The implementation of these improvements should make random testing a more effective component of NYPD's anti-corruption efforts.

The Department's efforts at integrity testing are substantial and well beyond that of any other major police department. The NYPD is clearly a leader and on the cutting edge of integrity testing. However, the Department's efforts to fight corruption will always require experimentation, flexibility and change. It would seem appropriate, at the end of an almost two-year period, that the Department reassess its current focus and its present allocation of both manpower and financial resources in its efforts to address the issue of police corruption through random integrity testing.

SAMPLE DATA

ID #	_____
Test #	_____
Overall Test Result	_____
Group	_____
Allegation code	_____
Test type	_____
Date	_____
Degree of difficulty	_____
Property Used	_____
Dollar amount used	_____
Drug weight used	_____
Bureau	_____
Boro	_____
Command	_____
Precinct	_____
Undercover used	_____
Type of location	_____
Day	_____
Tour	_____
Video	_____
Audio	_____
911 Used	_____
# MOS	_____
Procedural pass/fail	_____

Case Folder

- | | | Yes | No |
|---|--|--------------------------|--------------------------|
| 1 | Was a case folder provided? | <input type="checkbox"/> | <input type="checkbox"/> |
| | If not, please provide an explanation: _____ | | |
| | _____ | | |
| | _____ | | |
| 2 | Was a video tape provided? | <input type="checkbox"/> | <input type="checkbox"/> |
| | If not, please provide an explanation: _____ | | |
| | _____ | | |
| | _____ | | |
| 3 | Was an audio tape provided? | <input type="checkbox"/> | <input type="checkbox"/> |
| | If not, please provide an explanation: _____ | | |
| | _____ | | |
| | _____ | | |

Index Sheet

- | | | | |
|---|--|--------------------------|--------------------------|
| 4 | Is an Index Sheet included in the case folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5 | Are all worksheets listed in the case folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6 | Are there any documents in the case folder that are not listed? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7 | Is the Index Sheet signed and dated by the Team Leader after the last entry? | <input type="checkbox"/> | <input type="checkbox"/> |

Checklist

- | | | | |
|----|---|--------------------------|--------------------------|
| 8 | Is an Integrity Test Checklist included in the folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9 | Are all of the items checked on the checklist included in the folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 10 | Are there any documents in the folder not checked? | <input type="checkbox"/> | <input type="checkbox"/> |

Integrity Test Proposal (Request)

- | | | | |
|----|--|--------------------------|--------------------------|
| 11 | Is a Request included in the case folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 12 | How many days before the test was the Request dated? | | _____ |
| 13 | Does the scenario described in the Request correspond to the activity described in the Case Officer's worksheet? | <input type="checkbox"/> | <input type="checkbox"/> |

Site Survey

- | | | | |
|----|---|--------------------------|--------------------------|
| 14 | Is a Site Survey Report in the case folder? | <input type="checkbox"/> | <input type="checkbox"/> |
| 15 | Does the location of the site survey correspond to that described in the Request? | <input type="checkbox"/> | <input type="checkbox"/> |

- 16 Was the timing of the site survey within the same timeframe that the test was conducted?
- 17 Was the site survey conducted at the same location that the test was conducted?

Tactical Plan

- 18 Is the Tactical Plan in the case folder?
- 19 Does the Tactical Plan include:
- 20 The test scenario?
- 21 Personnel utilized for the activity?
- 22 Assignments of all personnel listed?
- 23 Equipment utilized for the activity?
- 24 Designated equipment manager?
- 25 Designated hospital response vehicle?
- 26 The name of a hospital?
- 27 Directions to the hospital?
- 28 Nearest NYPD precinct?
- 29 Emergency script?
- 30 Emergency signal(s)?
- 31 Staging area location?
- 32 Set location?
- 33 Directions to set?
- 34 Was the Tactical Plan approved?

If yes, by whom and on what date? Name _____ Date _____

Map

- 35 Is a map included in the folder?
- 36 Does the map cover the set location?

Money/Property

- 37 If applicable, does the folder contain photocopies of money utilized?
- 38 If applicable does the folder identify property utilized?
If yes, how? _____

Identification

39 Does the folder contain a warrant check of the undercover's fictitious identity?

Worksheets

Case Officer

40 Does the folder contain a worksheet completed by the Case Officer?

41 Are all relevant worksheet captions completed?

42 How many days following the test was the worksheet completed? _____

Undercover Officer

43 If applicable, does the folder contain a worksheet completed by the Undercover?

44 Are all relevant worksheet captions completed?

45 How many days following the test was the worksheet completed? _____

Tech Officer

46 If applicable, does the folder contain a worksheet completed by the Tech Officer?

47 Are all relevant worksheet captions completed?

48 How many days following the test was the worksheet completed? _____

Backup Officer

49 If applicable, does the folder contain a worksheet completed by each Backup (Ghost) Officer?

50 Are all relevant worksheet captions completed?

51 How many days following the test was the worksheet completed? _____

Sprint Printout

52 According to the documentation, was the activity initiated by a 911?

53 According to the documentation, was the activity initiated by a pickup call?

54 Does the folder contain the Sprint printout showing the sector responding to the activity?

Roll Call

55 Does the folder contain a copy of the roll call for the command/precinct being tested?

56 If yes, Is the roll call finalized?

57 Is the subject officer(s) identified?

Test Results

58 Does the folder contain a copy of the Integrity Test Results sheet?

59 Are all relevant captions completed?

- 60 How many days following the test was the sheet completed? _____
- 61 According to the documentation was a "Critique" completed?
 If yes, what comments, if any, were made? Record verbatim: _____

- 62 According to the documentation was the "Remarks/FADO" section completed?
 If yes, what comments, if any, were made? Record verbatim: _____

- 63 Were any items in the folder written in pencil?
 Specify: _____

- 64 Was "white out" used on any items in the folder?
 Specify: _____

Qualitative Questions

- 65 Was the scenario appropriate/credible/authentic to obtain evidence of corrupt activity
 If no, explain _____

- 66 Was the set authentic and credible for the given scenario?
 If no, explain _____

- 67 Was the location authentic and credible for the given scenario?
 If no, explain _____

- 68 Was the MOS drawn to the location in a credible fashion?
 If no, explain _____

- 69 If an undercover was used, did he/she fit the community and environment where
 the test was conducted?
 If no, explain _____

- 70 Was the undercover's script credible?
 If no, explain _____

- 71 Was the undercover's performance credible?
 If no, explain _____

72	If backups were used, did they fit the community where the test was conducted? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
73	If backups were used, were both male and female backups used?	<input type="checkbox"/>	<input type="checkbox"/>
74	If props were used, did they appear authentic and credible? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
75	Did the scenario produce an opportunity for the MOS to engage in corrupt activity? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
76	Could anything have alerted the MOS to the possibility that this was a test? If yes, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
77	Was there any indication that the MOS was alerted to the possibility that this was a test? If yes, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
78	Does the test identify any possible training needs? If yes, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
79	Does documentation indicate whether or not training needs were identified? If yes, record verbatim _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
80	Was the scenario designed and executed to collect sufficient evidence? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
81	If an audio recording was reviewed, was it clear and complete? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
82	If a videotape was reviewed, did it capture the complete activity? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
83	If a videotape was reviewed, was it clear?	<input type="checkbox"/>	<input type="checkbox"/>
84	Is there evidence in the case file to demonstrate that there was adequate preparation and planning in contemplation of the test? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
85	If money/property was used, is there evidence in the case file that it was tracked and accounted for? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			
86	If audio/video tapes were made, is there evidence in the case file that they were properly vouchered? If no, explain _____	<input type="checkbox"/>	<input type="checkbox"/>
<hr/>			

