



FOLLOW-UP REVIEW • REPORT NUMBER 22-02 • MAY 2022

DNR Law Enforcement

Some actions have been taken to address audit recommendations

Greg S. Griffin | State Auditor
Leslie McGuire | Director



DOAA

Georgia Department
of Audits & Accounts



Performance Audit Division

Greg S. Griffin, State Auditor
Leslie McGuire, Director

Why we did this review

This follow-up review was conducted to determine the extent to which the Georgia Department of Natural Resources Law Enforcement Division (LED) addressed the recommendations presented in our August 2020 performance audit (Report #19-13).

The 2020 audit examined whether LED's field operations unit had: 1) distributed and assigned wardens appropriately; 2) coordinated effectively with partners for law enforcement services; and 3) adopted cost-effective technology to improve conservation law enforcement.

About LED

While LED's core mission is to protect Georgia's natural resources, its wardens are POST-certified sworn officers and have the authority to enforce all state laws. LED is organized into six regions, and counties in each region are grouped geographically into work units that typically consist of five to seven game wardens. Collectively, the team of wardens is charged with conducting law enforcement activities within the work unit.

In fiscal year 2021, LED expenditures totaled approximately \$28.4 million, with approximately 90% from state general funds and license fees. LED's expenditures decreased 7% from pre-pandemic levels (fiscal year 2019).

DNR Law Enforcement

Some actions have been taken to address audit recommendations

What we found

The Department of Natural Resources (DNR) Law Enforcement Division (LED) has taken action to address some operational issues identified in our 2020 performance audit. LED improved data collection of warden activity on DNR properties, and management indicated it will incorporate the information into its decision making beginning July 2022. LED also developed a policy for warden scheduling and updated its audio/video policy to include the use of field cameras, though additional action is needed to strategically manage field cameras. Finally, further action is needed to formally coordinate with other DNR divisions.

At the time of the audit, LED did not maintain data required to completely and accurately identify the demand for warden presence and services throughout the state. This compromised management's ability to account for warden activities, measure productivity, and align warden resources to historic law enforcement demand patterns or planned patrols. Additionally, coordination and strategic planning efforts between LED and other divisions were limited, which prevented LED from ensuring it met other divisions' enforcement needs. Finally, LED procured field cameras to augment wardens' capacity to patrol and monitor multiple locations, but it did not adopt a risk-based strategy to distribute field cameras.

Workforce Distribution, Assignment, and Performance Management

Following the release of our 2020 report, LED improved data collection of game warden activities by replacing the Bimonthly Activity Report (BMAR) system with the Smart Cop Activity Log (SCAL). With SCAL, management report that they can better capture data on game wardens' time, location, and activities on all properties. According to staff, SCAL data will be used to analyze and inform resource

allocation and oversight. However, as of this review LED continues to assign at least one warden to each county when possible.

SCAL, unlike BMAR, can produce standard activity and performance reports by varying workforce units (e.g., individual warden, work unit, region, statewide) and time scales (e.g., daily, weekly, monthly). As a result, management has better information to account for warden activities, measure productivity, and align warden resources to law enforcement demand. SCAL is also configurable in real time as LED's needs change. For example, LED was tasked with supporting the COVID-19 vaccine roll-out efforts and created a new category to track time spent on these efforts.

In addition, to address complaint collection and monitoring, LED implemented a Watch Order module within each warden's mobile data terminal (located in their patrol vehicle), which enables wardens to input and review complaint call information. LED also updated its policies and procedures on "flex days" to allow additional options for warden time assignments and scheduling. Although wardens continue to self-assign their on-duty hours, policy now requires captains and sergeants to approve schedule changes to ensure adequate regional coverage.

Coordination and Strategic Planning

LED staff indicated that informal discussions between LED supervisors and staff in other divisions guide staffing assignments. Regular in-person interdepartmental meetings were suspended due to the pandemic; however, these resumed in April 2022. Additionally, while LED has improved its data collection, it has not yet analyzed the information from SCAL or formally sought feedback from other divisions on their high activity areas. Staff indicated it intends to review, utilize, and share information with other divisions beginning July 2022.

Conservation Technology

LED has updated its field camera policy to include language on the standards and expectations for wardens when they utilize conservation technology. Unless specifically directed, wardens continue to decide whether and when to use field cameras. As noted in the original audit, this practice can lead to inconsistencies in how, when, and why game wardens use field cameras. Additionally, LED continues to equally distribute the field cameras among its regions and investigative units rather than distributing based on risk, which may result in underutilization.

DNR's Response: *DNR agreed with the current status as presented in the following table and noted that it will continue to implement the action plan to address each of the findings.*

The following table summarizes the findings and recommendations in our 2020 report and actions taken to address them. A copy of the 2020 performance audit report (#19-13) may be accessed at:

[DNR LED Performance Audit Report.](#)

DNR Law Enforcement Follow-Up Review, May 2022

Original Findings/Recommendations	Current Status
<p>Game warden location assignments do not align with patterns of law enforcement actions; however, more data is required to completely and accurately identify warden demand.</p> <p>At the time of the original performance audit, LED distributed its wardens based on the number of counties in a region instead of service demand or law enforcement actions. Additionally, LED had not developed standards, practices, or geographic information systems to ensure geographic patterns and valid service call data were recorded or retrievable for management to consider when assigning wardens.</p> <p>We recommended that LED update its historical method for distributing wardens throughout the state by using data that identifies patterns of law enforcement actions and risks, including calls for direct warden services (e.g., complaint calls).</p>	<p>Partially Addressed – LED has improved how it captures game warden activity and demand data through the newly configured Smart Cop Activity Log (SCAL) and Watch Order module. According to staff, LED will formally review warden demand and assignments beginning July 2022.</p> <p>In July 2021, LED replaced the Bimonthly Activity Report (BMAR) with SCAL, which allows LED to configure and query information by officer, activity type, and location. LED management can use this data to create reports (e.g., work unit, region, statewide) that includes warden activities across various time frames (e.g., day, week, month). For example, LED management can determine how many hours an individual officer spent on “general fishing enforcement,” as well as the type and number of actions taken (e.g., on April 21, 2022, Officer Smith charged 6 hours to general fishing enforcement and checked 10 fishing licenses).</p> <p>LED staff stated SCAL will better inform personnel assignment decisions in the future. For example, LED management plans to review SCAL data beginning in July 2022 (after capturing one year of activity) and assess whether warden assignments should be adjusted. Additionally, LED management stated it will prioritize sending new wardens to high-activity areas and then fill statewide vacancies (as of March 2022, 30 counties had at least one vacancy). LED maintains its position that assigning one warden per county (i.e., maintaining physical presence) is an effective deterrent for unlawful activity.</p> <p>In addition to SCAL, LED implemented the Watch Order module in Fall 2021 to improve its data capture of law enforcement actions and risks. The module collects information on when a complaint is received, who responded to it and how, and complaint status (e.g., active, closed). The Watch Order module can be completed through the warden’s mobile data terminal (located in their patrol vehicle) and captures more relevant data to assess statewide warden demand.</p>

DNR Law Enforcement Follow-Up Review, May 2022

Original Findings/Recommendations	Current Status
<p>Game warden time assignments do not align with patterns of law enforcement actions; however, more data is required to completely and accurately identify warden demand.</p> <p>During the previous audit, we used law enforcement action data to determine demand for warden services by day and by season. We determined that LED warden assignments did not align to times of highest law enforcement risk. Also, assignments were impacted by wardens’ ability to determine their own schedules irrespective of peak activity times.</p> <p>In addition to improving data collection, we recommended that LED consider whether to adjust either the master scheduling protocols or the methods of daily work hour assignments or permissions, to better ensure that work hours aligned with times of highest law enforcement risk.</p>	<p>Partially Addressed – As noted previously, LED has improved data collection with the SCAL system, which will inform scheduling. Additionally, LED developed a new scheduling policy to assist with warden recruitment and retention.</p> <p>LED’s new SCAL system will assist in aligning warden assignments to high-risk times and areas. SCAL maintains daily records of warden activity data, including time allotted to each activity, which provides more detailed reporting that LED management can use to inform warden assignments. For example, LED management and sergeants can extract and review how much time was spent within a region, what activities were performed, and overall warden productivity. LED staff will begin reviewing the data in July 2022.</p> <p>At the time of the original audit, LED management indicated it had difficulty recruiting and retaining younger people who valued time off. In September 2021, LED updated its scheduling policy (which previously allowed one weekend off per month) to allow 3 flex days per each 28-day cycle, giving wardens additional scheduling options. Also, according to the policy, captains and sergeants will work together to ensure adequate regional coverage when approving requests for time off.</p>

DNR Law Enforcement Follow-Up Review, May 2022

Original Findings/Recommendations	Current Status
<p>LED can improve reporting capabilities to track activity and productivity for regions, work units, and wardens.</p> <p>At the time of the previous audit, the data systems LED used to record law enforcement actions did not provide complete data to analyze the type and patterns of LED service demand, warden or work unit activities, or performance. This prevented LED from developing performance reports or assessing the impact of decisions related to warden assignments and patrol designs.</p> <p>We recommended LED improve methods of data collection to ensure that records of warden work activities were complete, accurate, and retrievable. Additionally, we recommended that data collection include time and geography.</p> <p>We also recommended management use the data to monitor and measure warden and work unit productivity to inform warden distribution, assignments, scheduling, and patrol planning.</p>	<p>Partially Addressed – As noted earlier, LED has taken several steps to improve its reporting capabilities through SCAL and the Watch Order module. However, opportunities remain to ensure complete and accurate data collection.</p> <p>According to LED management, SCAL and Watch Order data are continuously maintained, cannot be overwritten, and are captured routinely. However, unlike SCAL, wardens are not required to record all formal and informal calls for service in the Watch Order module which leads to incomplete information. Additionally, while supervisors receive some training on how data should be used, LED does not provide wardens written guidance on inputting activity or complaint information into either system.</p> <p>As noted above, while the new systems provide additional information, they have not yet been used to inform decisions. LED staff stated that they will issue formal guidance at a future date to instruct supervisors to use SCAL data to assess overall warden time and location demands and inform warden distribution.</p>

DNR Law Enforcement Follow-Up Review, May 2022

Original Findings/Recommendations	Current Status
<p>LED should better coordinate and integrate information into its planning to ensure it is meeting DNR’s law enforcement needs.</p> <p>In 2020, we found LED could benefit from more formal and consistent communication with partner divisions, specifically State Parks & Historic Sites (SPHS) and Wildlife Resources (WRD), to ensure personnel focus on the highest risk areas, as well as facilitate collaborative planning and coordination efforts. These partner divisions rely on LED to provide law enforcement support services (e.g., responding to calls for assistance, recurring patrols to monitor state parks).</p> <p>We recommended LED develop methods to periodically obtain relevant visitation, utilization, inventory, and other relevant data from SPHS and WRD, and consider the data received when assigning wardens geographically. We also recommended LED develop methods for reporting to SPHS and WRD on warden distribution and warden activities on their properties.</p>	<p>Partially Addressed –With the implementation of SCAL, LED is collecting information on the type and location of wardens’ activities, which it will share with other divisions. However, it has not formally received data from other DNR divisions that could inform warden assignments on those properties.</p> <p>According to LED, it intends to use data from SCAL to report to SPHS, WRD, and other partner divisions on the patrol activities and efforts on those properties. In lieu of formal data collection, LED supervisors informally discuss high-risk areas or specific complaints with staff of other divisions. Regular in-person interdepartmental meetings that were suspended due to the pandemic resumed in April 2022. LED management indicated these meetings will provide opportunities for detailed discussions of other divisions’ goals, priorities, and current hot spots, as well as foster communication and maintain professional relationships.</p>

DNR Law Enforcement Follow-Up Review, May 2022

Original Findings/Recommendations	Current Status
<p>LED has acquired field cameras to complement monitoring and investigative activities, but management can improve operations by adopting a risk-based strategy to distribute and use them.</p> <p>During the audit, we found LED did not utilize a risk-based approach in camera assignment, nor had it distributed the cameras to mitigate the loss of wardens to cover specific geographic areas. LED distributed 12 field cameras to each of the 6 regions and assigned 4 to the investigative unit (76 total cameras). Additionally, LED did not have written standards regarding when game wardens were expected, or required, to use the cameras to monitor areas and/or collect evidence. We found that individual game wardens had full discretion on whether to use field cameras.</p> <p>We recommended LED develop a strategic method for distributing field cameras to regions, work units, or personnel based on expected need and appropriateness. We also recommended LED develop standards and expectations for wardens to adopt and meet when using cameras in the field.</p>	<p>Partially Addressed – LED has developed a policy on deployment of field cameras. However, it has not strategically distributed cameras or required wardens to use them.</p> <p>Since the original audit, LED updated its policy for all audio and video recording devices (e.g., body worn cameras) to include field cameras. It provides guidelines on the use and storage of field cameras, as well as the duplication and retention of recorded files for evidentiary purposes. However, the policy does not include language regarding when or how to use the cameras; as such, wardens continue to use the cameras at their discretion. According to LED staff, field cameras will only be used when a complaint is received (e.g., someone is hunting in a restricted area) or when wardens have identified potential illegal activity.</p> <p>In addition, LED continues to distribute cameras equally among the regions and investigative units instead of using a more strategic distribution based on risk. LED staff stated that regions and investigative units share cameras if a need arises, and that staff have not requested additional cameras. According to LED staff, field cameras can be used as force multipliers; as such, some officers currently monitoring several counties utilize field cameras to optimize their reach. However, LED staff stated warden vacancies fluctuate over time, so it would not be advantageous to change the field camera distribution from current practices.</p>
<p>5 Findings</p>	<p>0 Fully Addressed</p> <p>5 Partially Addressed</p> <p>0 Not Addressed</p> <p>0 No Recommendations</p>

This page intentionally left blank