



MANAGEMENT LETTER of AUDIT OBSERVATIONS

November 12, 2019

Eric Crespin, Deputy Fire Chief

An audit of the Fire Administration's P-Card, Codes Enforcement and Stipend Programs, and Inventory and Pharmacy Operations was completed as of November 8, 2019. The issuance of an official Audit Report is pending Management Responses. Internal audits are carried out in all areas of County operations. The audit focus is upon improving operations by providing management with a reasonable assurance of whether or not internal controls exist and are effective in their area of operations. When internal control deficiencies are identified, they are brought to management's attention along with recommendations for improvement, within the Audit Report. As a result of this audit, the Internal Audit Function will schedule a 90-120 Day follow-up with the Fire Administration, concerning progress made on addressing the Moderate-level risks/findings indicated in the official Audit Report.

The internal audit process consists of a thorough review and understanding of applicable SOPs and policies governing operations and staff actions. Interviews with knowledgeable staff, direct observation of department activities, as well as the testing/reviewing of documentation that support purported activities, are conducted. The audit focused upon the period of January 1, through December 31, 2018.

The following comments, which have been or will be discussed with you, are intended to improve the Fire Administration's internal control structure. Comments are presented here and not within the official Audit Report, as these items are viewed as beyond the immediate scope of the audit. As with all Management Letters, an official response in writing is not required, however verbal feedback to the internal auditor is encouraged. A few auxiliary items that were

revealed, of which Fire Administration leadership may want to stay abreast and address, are below (*Management Input is italicized*).

1. Emergency Reporting System (ERS) Software

While visiting fire stations, multiple individuals at each station iterated having a lack of familiarity or level of comfort, operating the Emergency Reporting System software. Most agreed that they had received training, but did not understand the system well. The Audit inquired with Fire Administration leadership of the possibility of sending someone out to fire stations during weekly meetings, for hands-on refresher training. Leadership's being more active in this area could both emphasize the ERS's importance and improve training in this area.

Leadership resolved that they had provided adequate opportunities for hands-on training, and that training via video conferencing or recordings is currently available upon any Station Chief's request.

2. Media Exposure

During fire station visits, it was stated that Station Chiefs would like to be able to recognize achievements, particularly by younger volunteers, but were not clear on what channel to utilize to inform DAC's Media and Public Communications Department of newsworthy occurrences. The Media Department leader made a staff member available to attend the next monthly Fire Chiefs' meeting to welcome input and explain avenues of getting such accomplishments into the media, to include the type of events that are considered newsworthy.

Fire Administration leadership explained that all such communications would go through the Fire Administration, and that Station Chiefs were already aware of the avenues for advertising such recognition.

3. Traumatic Incidents Counseling

Every station visited asserted that in many cases, an After Action Review (AAR) is conducted either at the scene of an incident, after returning to the station, or during the monthly meetings at fire stations. While one station included the discussion in its minutes, other stations were content not to record their verbal discussions/feedback. As this is an area that appears to be left to the Station Chiefs' managerial discretion, the Audit finds it prudent to establish a standard or threshold that would recommend counseling for certain traumatic events/incidents.

The Audit recommends that Fire Administration leadership consider recommending counseling after certain events. Herein, recommending counseling from the critical incident stress management team by the State Fire Marshall's Office or Doña Ana County's employee

assistance program for events that result in the injury or expiration of fire station personnel or community members who are known to the volunteer or paid respondents, is a practice that shows concern for the well-being of those closely involved with an incident. If the person refuses to receive counseling, then a signature on a standard Refusal of Counseling form (implemented by the Fire Administration) should be signed.

In addition, certain (1) standard questions should always be asked after an incident, and (2) feedback should be chronicled for all AARs as a measure of recording due diligence efforts. The Audit recommends that the Fire Administration consider these comments for implementation.

While making Critical Incident Stress Debriefings mandatory is a current practice, we cannot ensure that every one is available to attend at a specific time. We can make sure our paid staff that is required to attend is released from duty to do so, but ensuring volunteers attend is beyond the scope of "volunteering". We generally have an excellent turn out for all levels of debriefings that we coordinate.

4. Public Employees Retirement Association Credit

Conversations with multiple volunteers revealed that many are uninformed concerning what is required to qualify for Public Employees Retirement Association (PERA) credit, as well as what that credit may be worth in the future. Most rely solely upon the Station Chiefs to input the time on their behalf, but are unaware of how much activity is required to accomplish a 'good year' for PERA purposes. Correspondences with Human Resources personnel revealed their readiness to educate volunteers about the program.

Fire Administration leadership stated that they have already disseminated information about PERA qualifications, thus all volunteers already have access to learning the level of performance necessary to qualify for annual PERA credit.

5. Recruiting & Retention

One of the most reported areas of concern was that of recruiting and retention. There are noted variances in attitudes toward recruiting, as all fire stations perform some type of community outreach. However, some believe the onus to promote and recruit is on the Fire Administration. The amount of community outreach amongst the fire stations varies greatly, with some purporting to be much more engaged than others. This is an area wherein quite a bit of feedback for improvement was received. Input ranged from reaching out to high schools and colleges, attending civil events alongside other professional organizations, to having social events amongst groupings of fire stations, and sponsoring training competitions among stations while inviting the public.

While the Doña Ana County website currently purports that the fire stations are staffed by approximately 300 volunteer firefighters, continued recruiting and retention may be better promoted by the Fire Administration and fire stations coordinating their community outreach efforts, so that no one entity bears the full responsibility alone. The Audit recommends that the Fire Administration undertake efforts to promote collaboration with fire stations, when it comes to recruiting and retention, as well as provide annual retention training to Station Chiefs as deemed necessary.

Please provide some resources for “annual retention training to Station Chiefs as deemed necessary” as I am unfamiliar with any. Fire administration does the bulk of recruitment efforts throughout the County. We also provide recruitment materials to all of the stations to support their efforts.

We provide many retention related incentives to include stipends, training and education, extra points when applying to County Fire and various other growth related opportunities.

6. No Donations

When asked about donations during the audit, some volunteers stated that they would refer any perspective donors to the County’s administration building. However, more often than not volunteer fire fighters either iterated that they did not accept donations, were not allowed to accept donations, or were unfamiliar with the protocol for accepting donations. While it is not mandatory to accept donations (Resolution No. 2017-53 states that “any money received should be gratefully accepted...”), Doña Ana County Resolution No. 2017-53 does allow for donations to be accepted and credited, if that is the desire of the donor, to the account of the donor’s preferred fire station.

As refusing a donation from a well-meaning donor could be perceived by the would be donor as a gesture of ill will on behalf of the Fire Administration, and the responsibility of handling funds may be uncomfortable to the volunteer, the Audit recommends that the Fire Administration consider the implementation of any combination of the following options:

1. Establish a standard form and protocol for accepting nonmonetary donations, wherein the local fire station records the donated items and descriptions on a form, secures the item(s), and reports the data to the Fire Administration.
2. Encourage fire stations to develop pre-addressed envelopes for those who would like to make monetary donations, so that they are available to distribute to donors.
3. Coordinate with the Finance Department to implement a secure payment rail type of electronic medium for receiving monetary donations.

However the Fire Administration would address this matter, volunteers should be made aware of the current guidance concerning accepting donations. Also, monetary donations are

to be remitted directly to the Accountant II in Finance, who is then responsible for crediting the funds to a perspective fire station's account.

While these may be excellent ideas the auditor has, they remain extremely low on my priority list as well as the fact that they are beyond our ability and our scope.

7. Inaccurate Contact List

There were a number of inaccuracies found within the contact information in the Fire Districts and Contacts listing, remitted to the internal auditor. For three of the five fire stations contacted, the following was found - In one case the person listed was no longer a member; in one case the listed Station Chief was inaccurate, as someone else was now Chief; and in one case the contact numbers for the Station Chief were inaccurate.

The Audit recommends at least an annual update of the Fire Districts and Contacts listing.

A request for updated rosters and contact information is sent at least quarterly, and many times monthly.

8. ISO-Related Areas of Weakness

The Audit reviewed both Insurance Service Office (ISO) North and South Public Protection Classification Rating Reports for areas/sections rated, which would require additional attention. Herein, 11 Items within the 4 Fire Suppression Rating Schedules were reviewed as these items indicated that the Fire Administration had acquired (scored) less than half of the points available, for these items. A meeting with the Fire Chief was held to discuss ISO scores in the areas below, to inquire with the Chief about what was being done to improve ISO ratings in these areas.

The Fire Chief shared a proposal to conduct a fire station Location & Deployment Study. He is in the process of contracting a service to aid in determining the proper location of fire stations as well as where to place 24-hour staff, as this could be determined via a deployment analysis. His goal is to have a consultant begin the analysis before the end of calendar year 2019.

The areas below were addressed with the Fire Chief due to their unusually low scores. The Fire Chief made it known that the Fire Administration follows the International Fire Code (IFC) 2015, which may differ from ISO fire prevention code regulations.

561. Credit for Deployment Analysis. This item examines the number and adequacy of existing engines, and ladder-service companies to cover buildings in areas of the city/county.

ISO North score was 2.87 of 10

ISO South score was 3.11 of 10

Fire Chief Response: This rating is based upon the area's population as well as the number of miles a station is located from a populated area. As mentioned above, I am currently in the process of contracting a service to aid in determining the proper location of fire stations. Making adjustments based upon the results of this service could greatly aid in raising the scores in each report.

571. Credit for Company Personnel. This item reviews the average number of existing firefighters and company officers available to respond to reported first alarm structure fires in the city/county.

ISO North score was 1.13 of 10

ISO South score was .90 of 15

Fire Chief Response: There is currently no clear path ahead for improving this score, as what is ideally needed is more paid staff. We have reallocated resources into the current 4 districts to better address this area.

581. Credit for Training. Training includes facilities and use, company training, classes for officers, new driver and operator training, existing driver and operator training, training on hazardous materials, recruit training, and pre-fire planning inspections.

ISO North score was 1.75 of 9

ISO South score was 2.45 of 9

Fire Chief Response: We have learned that ISO would rather have different personnel trained in different specialties rather than having one person holding a certificate of training in numerous areas. Thus, the following actions have been taken: 1) A monthly training calendar of classes offered is distributed and more training is offered, 2) a Training Committee has been developed to address training needs, 3) an agreement with Doña Ana Community College has been developed to allow for training at their facilities; and 4) steps have been taken to encourage people to use the records management system to record training received.

631. Credit for Inspection and Flow Testing. Frequency of fire flow testing.

ISO North score was 1.25 of 7

ISO South score was 0.05 of 7

Fire Chief Response: I am currently encouraging volunteers to do visual fire hydrant inspections for hydrants in their area, and record those inspections. Ideally, water flow tests should be conducted. However, some water companies won't allow firefighters to perform tests on their hydrants. Thus, I remitted the ISO test requirements to the water companies, requesting that they perform the tests on their hydrants.

Item 420. Tele communicators.

A1. Alarm Receipt. Receipt of alarms shall meet the requirements in accordance with the criteria of NFPA 1221

A2. Alarm Percentage. Processing of alarms shall meet the requirements in accordance with the criteria of NFPA 1221.

ISO North score for A1 was 6.92 of 20; A2 was 1.73 of 20

ISO South score for A1 was 6.92 of 20; A2 was 1.73 of 20

MRVDA Deputy Director's Response: *MVRDA is always striving to improve where needed. We at MVRDA are working on a strategic plan. Part of the plan will call for some improvements, [and] those areas are listed in the plan.*

Item 1025 – Credit for Fire Prevention Code Adoption and Enforcement

Fire Prevention Code Regulations – Evaluation of fire prevention code regulations in effect.

Fire Prevention Staffing – Evaluation of staffing for fire prevention activities

ISO North for the sections above were 2.76 of 10 and 3.83 of 8 respectively

ISO South score for Fire Prevention Code Regulations was 2.76 of 10

Fire Chief Response: *The Fire Administration follows state code, which is IFC 2015. This will aid in the fire prevention code regulations of ISO. In addition, the Fire Administration has begun giving inspection tasks to full-time staff to address the evaluation of fire prevention code regulations.*

Hydrant Flow Data Summary. While this section of the ISO Report indicated multiple fire hydrants that did not meet the needed flow PSI, the Fire Chief iterated that such areas are beyond the control of the Fire Administration as the water provider controls the water flow.

The Fire Chief also purported that some things such as water flow/pressure and telecommunication standards are beyond his control, yet these factors still effect his ISO rating/scoring.

Items for Verbal Discussion - During the upcoming Exit Conference, the internal auditor will discuss the following items with Fire Administration leadership:

1. Actions to be taken concerning the aging, unused fire vehicles currently on the yard, at the Fire Administration
2. For information requests, perhaps the utilization of personal email addresses, or educating Station Chiefs on how to open County emails at home, will allow for the receipt of faster responses from Station Chiefs back to the Fire Administration

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3. For instances of suspected stipend abuse, periodically cross reference run reports to verify the accuracy of stipend respondent data
4. ERS access issues for volunteers could be addressed by Fire Administration follow up with IT, or password update privileges being extended to Station Chiefs
5. Discontinue indicating former inventory items on current inventory listings unless there is a purpose
6. Expansion of current budgets for 24-hour stations, as they may be more active than other fire stations
7. Emphasize SOP awareness among fire station volunteers as many purported to not be familiar with SOPs
8. There is a pronounced appreciation for the multiple training opportunities provided by the current Training CPT
9. Consider garnering more buy-in/support by sharing of the Fire Chief's long-term vision among Station Chiefs, for fire stations and the use of Battalion Chiefs

Thank you for the attention given to the items cited above.

NOTE: Italicized data above denote representations made by Fire Administration leadership.

Very Respectfully,


Ernest Harvin, CIA