

INTERNAL AUDIT REPORT

2023-01

Training Center Operations

Anchorage Fire Department

April 5, 2023



MUNICIPALITY OF ANCHORAGE
MAYOR DAVE BRONSON

OFFICE OF INTERNAL AUDIT

April 5, 2023

Honorable Mayor and Members of the Assembly:

I am pleased to present for your review **Internal Audit Report 2023-01, Training Center Operations, Anchorage Fire Department**. A summary of the report is presented below.

In accordance with the 2022 Audit Plan, we have completed an audit of Training Center Operations at the Anchorage Fire Department. The objective of this audit was to determine whether Anchorage Fire Department Training Center operations were adequate to support the department's training needs. Specifically, this audit focused on the training of Anchorage Fire Department Fire and Emergency Medical Services personnel. Our audit included a review of training records from January 1 to December 31, 2021, course offerings, and regulatory requirements. Specifically, we compared the training records of Anchorage Fire Department Emergency Medical Services personnel to State of Alaska licensing and recertification requirements.

Our audit revealed that the Anchorage Fire Department Training Center needs to make significant changes to ensure that the Anchorage Fire Department's Fire and Emergency Medical Services personnel training is administered, developed, delivered, and tracked in a more efficient manner. Specifically, the Training Center's processes did not fully support State of Alaska requirements for bi-annual recertification of Emergency Medical Services personnel. In addition, the Training Center did not have complete, accurate, or readily available information regarding the Anchorage Fire Department's training activities. Furthermore, the Training Center did not have written policies and procedures regarding training. Finally, the Anchorage Fire Department did not have any performance metrics for the Training Center.

There were four findings in connection with this audit. Management was responsive to the findings and recommendations.

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Director, Internal Audit



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Internal Audit Report 2023-01
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Introduction. The Anchorage Fire Department (AFD) has a Training Center located on Airport Heights Road consisting of administrative offices, classrooms, and simulators to support the on-going training, education, certification, and re-certification of selected AFD personnel. Since 2020, Training Center staff have been using the “Agency 360” software system to track training done by new recruits and those seeking promotion at AFD’s fire training academy. Training Center staff also use the “Training Tracker” software system to manage other training needs such as ongoing Emergency Medical Technician (EMT) training and Firefighter training.

The Training Center is staffed by an Assistant Chief, three Fire Training Specialists (one position was vacant at the time of this audit), a Video Producer, and an Administrative Services Associate. Training requirements vary based on tenure and job duties. For example, training is provided for the following groups:

- *New Recruits* – The Anchorage Fire Department periodically hires new personnel and conducts a full academy training program on-site to provide required training to new firefighters entering the force. These personnel then enter a probationary period to complete AFD’s training requirements for Journeyman Firefighter status.
- *Journeyman Firefighters* – Firefighters are required to achieve and maintain their working status through the fulfillment of in-house training requirements. After completing probation, this training must be completed within four years from the date of hire.
- *EMTs/Paramedics* – Personnel certified to provide Emergency Medical Services (EMS); defined as specialized emergency medicine in the field outside of the hospital. To perform EMS duties in the State of Alaska (State), all EMTs are required to be certified by the Alaska Department of

Public Health, Division of Public Health Emergency's Medical Services Section. This certification consists of required initial training, and recurring, periodic recertification training hours to “. . . ensure that qualified and properly equipped emergency medical services personnel are available to respond to the emergency medical needs of Alaska's citizens.”

- *Specialty Skills* – Firefighters assigned to areas requiring unique skills such as search-and-rescue and the dive rescue team are subject to separate and specialized training and AFD's performance requirements to maintain their skills.
- *Instructors* – Training Center instructors who are qualified to conduct training are also required to maintain specialty levels of knowledge and training.
- *Fire Apparatus Engineer* – Personnel uniquely trained and certified to perform duties as a Pumper/Aerial Apparatus Engineer under emergency/non-emergency operational situations.
- *Fire Officer* – Personnel uniquely trained and certified to perform duties as a supervisor/manager (Captain, Senior Captain, Battalion Chief) under emergency/non-emergency operational situations.

Objective and Scope. The objective of this audit was to determine whether AFD Training Center operations were adequate to support the department's training needs. Specifically, this audit focused on the training of AFD Fire and EMS personnel. Our audit included a review of training records from January 1 to December 31, 2021, course offerings, and regulatory requirements. Specifically, we compared the training records of AFD EMS personnel to State licensing and recertification requirements.

We conducted this performance audit in accordance with generally accepted government auditing standards, except for the requirement of an external quality control review. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence

obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The audit was requested by the Administration.

Overall Evaluation. The Anchorage Fire Department's Training Center needs to make significant changes to ensure that AFD's Fire and EMS personnel training is administered, developed, delivered, and tracked in a more effective manner. Specifically, the Training Center's processes did not fully support State requirements for bi-annual recertification of EMS personnel. In addition, the Training Center did not have complete, accurate, or readily available information regarding AFD's training activities. Furthermore, the Training Center did not have written policies and procedures (P&Ps) regarding training. Finally, AFD did not have any performance metrics for the Training Center.

FINDINGS AND RECOMMENDATIONS

1. EMS Personnel Recertification Not Fully Supported.

Finding. The Training Center's processes did not fully support State requirements for bi-annual recertification of EMS personnel. The State of Alaska follows the National Registry of Emergency Medical Technicians requirements for continuing medical education (CME) training hours needed for recertification based on respective EMS levels (EMT 1, 2, 3, or Paramedic). One of the stated goals of this program is to validate that ". . . EMS Professionals have maintained continued competence through education and practice for quality patient care to ensure public safety." These CME requirements were developed from the National Continuing Competency Program (NCCP) standards. These standards require that CME training hours counted towards EMS recertification be broken down into the following three main categories:

- *National Component (50%)* - Further subdivided into five subtopics:
 - Airway-Respirations-Ventilations, Cardiology, Trauma, Medical, and Operations

- *Local Component (25%)* - Topics determined by State EMS Offices, EMS regional directors, or local agency personnel.
- *Individual Component (25%)* - Self-directed training selected from areas which are State EMS Office recognized or accredited by the Commission on Accreditation for Prehospital Continuing Education (CAPCE).

Our review found that AFD EMS personnel received approximately 70 percent of their CME training course hours required for State recertification from, what AFD calls, “ad hoc” training. The Anchorage Fire Department defines this as training delivered outside of the Training Center, by on-duty, line AFD personnel such as a subject matter expert or shift captain. However, ad hoc training subject matter did not always fit into any of the previously listed categories prescribed by the NCCP model. Training topics presented were selected by field personnel and did not follow any strategic, coordinated, pre-defined curriculum developed by the Training Center staff instructors based on State recertification requirements.

Examples of ad hoc training included: “Rope System Training”, “Ice Rescue Training”, “Cognitive Reframing”, and “Vehicle Extrication Training.” Training Center staff were required to make an estimation of the applicability of these ad hoc trainings during a post verification process based solely on a brief course title displayed in the Training Center’s “Training Tracker” software system because no other information was available. Also, ad hoc training was not explicitly recognized by the State or CAPCE accredited.

In contrast, many other professions also require some demonstrated form of continuing education to maintain state and/or federal licensing or certification status. Many of these rely on established professional organizations to develop, manage, and deliver continuing education training courses individually tailored to their respective

recertification requirements. This relieves many organizations from much of the ongoing burden required to successfully manage continuing education training and delivery required to meet specific, complex regulatory accreditation standards.

Finally, according to AFD staff, ad hoc training was also used to support not only other core fire recertifications such as the Alaska Fire Standards Council (AFSC), Fire Service Instructor Level I, II, and III recertifications, but also several other non-core firefighting related department functions such as:

- Alaska Fire Standards Council, Certified Fire Investigator recertification.
- United States Department of Labor, Occupational Safety and Health Administration, Hazardous Waste Operations and Emergency Response refresher training and respiratory protection refresher training.
- Insurance Services Office, Public Protection Classification minimum facilities and practices training requirements. This is a tool for property and casualty insurers to assess their risk by rating fire protection services.

All these other requirements are important to the ongoing safe, efficient, and compliant operation of AFD as a professional fire service organization. While individual requirements for these other certifications varied, the lack of a strategic, coordinated, pre-defined curriculum developed by the Training Center staff for ad hoc training made it time consuming and difficult for Training Center staff to determine if the training met certification requirements.

- b. **Recommendations.** The Anchorage Fire Department Chief should ensure that Training Center processes, particularly ad hoc training, adequately support all State requirements for EMS personnel recertification, as well as other important requirements. In addition, AFD should explore the possibility of using established

professional EMS CME training where applicable to supplement current ad hoc training practices, and further strengthen AFD's EMS recertification process.

- c. **Management Comments.** Management stated, "Management concurs with this finding and recommendation. It is important to note that all AFD mobile intensive care paramedics (MICPs) and emergency medical technicians (EMTs) are fully credentialed and that their licenses/certifications are duly renewed as required. However, we acknowledge the overreliance on ad-hoc training and the lack of a strategic, coordinated, predefined curriculum developed by the training center staff. This is partly a lingering artifact of the pandemic, which required a near-complete reliance on ad-hoc training.

"The primary contributing factor to this finding is the lack of training staff. The training center staff consists entirely of two training specialists and an administrative assistant who report to an assistant fire chief. There exists an additional training specialist position that works at the 'AFD video center' at the Loussac Library, and whose primary responsibilities are producing Assembly meetings and programming for the MOA's television channel. There is a fourth training specialist position that has been vacant for nearly eight months and must remain vacant due to ongoing litigation.

"These personnel are fully consumed in delivering emergency medical, fire, and rescue training programs, new-hire firefighter and promotional academies, and management of the fire training campus and have little time to devote to planning and programming. Nevertheless, they have developed a strategic approach to training called the Pillars of Fire, Rescue, and EMS training. Fulfilling this recommendation will involve translating the Pillars into a coordinated, pre-defined curriculum that incorporates professional continuing education training."

- d. **Evaluation of Management Comments.** Management comments were responsive to the audit finding and recommendations.

2. **AFD Lacks Basic Training Information.**

- a. **Finding.** The Training Center did not have complete, accurate, or readily available information regarding AFD's training activities. As a result, decision makers did not always have adequate information when reviewing and establishing training needs and meeting recertification requirements. For example, due to the limitations in Training Tracker, reports generated and used by Training Center staff or Command staff to monitor training activities were inadequate to determine or verify the actual recertification status of all EMS personnel within the department at all times. Specifically, there was no single report to determine if an EMT had met certification requirements. To do so, Training Center staff needed to do the following:

1. Access the State's website to determine when the employee's certification expires.
2. Determine the number of training hours needed based on the employee's certification level (i.e., EMT 1, EMT 2, EMT 3, Paramedic).
3. Access Training Tracker to calculate the total number of training hours completed. (Note: Training Tracker does not break down training hours into the individual categories need for certification such as: airway, cardiac, trauma, etc.)
4. Look up the employee's list of ad hoc training during the designated period and interpret which categories these courses fit into.

5. Once the hours have been calculated and placed into the various categories then the employee needs to login to his/her individual account and complete the recertification process.
6. When the employee receives his/her recertification card it is supposed to be sent to the Training Center to upload into their system. However, according to Training Center staff, the recertification card is not always provided.

Moreover, Training Tracker was incapable of tracking individual category subjects, hours, and percentages. Instead, Training Tracker only tracked the total, cumulative hours received by each individual EMT. Not only does this process increase the risk of human error, but it may place the Municipality of Anchorage (Municipality) at significant regulatory risk in the event of an audit by the State, or even greater legal liability, and/or financial jeopardy in the event of an incident involving EMS personnel which resulted in a lawsuit against the Municipality.

- b. **Recommendation.** The Anchorage Fire Department Chief should ensure that Training Center processes and information technology system reports adequately support all State requirements for EMS personnel recertification.
- c. **Management Comments.** Management stated, “Management concurs with this finding and recommendation. In addition to the labor-intensive process to retrieve and correlate training records highlighted in the audit report, the current records management system (Training Tracker) is not conducive to collecting and inputting training records. The lack of functionality and requirement for dual entry of records almost certainly means some training activities are not documented. We will investigate and pursue a learning/records management system with the assistance of AFD Data Systems.”

- d. **Evaluation of Management Comments.** Management comments were responsive to the audit finding and recommendation.

3. **Lack of Written Policies and Procedures.**

- a. **Finding.** The Training Center did not have written P&Ps regarding training. For example, there were no P&Ps explaining how ad hoc training was developed, validated, tracked, and categorized. Policies and procedures are an important part of any organization. They ensure compliance with laws and regulations, give guidance for decision-making, and streamline internal processes. The United States Office of Management and Budget Circular Number A-123 states that documentation is “. . . required to demonstrate the design, implementation, and operating effectiveness of any entity’s internal control system.” Established, written P&Ps, providing specific guidance on ad hoc training development and delivery, CME tracking, monitoring, and reporting, may have prevented or mitigated the deficiencies described in this report.
- b. **Recommendation.** The Anchorage Fire Department Chief should ensure that written P&Ps are established for Training Center operations.
- c. **Management Comments.** Management stated, “Management concurs with this finding and recommendation. At one time, an entire compendium of policies and procedures governing training center operations existed. We will work to resurrect, update, and implement the AFD training series of policies and procedures.”
- d. **Evaluation of Management Comments.** Management comments were responsive to the audit finding and recommendation.

4. **Lack of Performance Metrics.**

- a. **Finding.** The Anchorage Fire Department did not have any performance metrics for the Training Center. Anchorage PVR: Performance. Value. Results. program guide (PVR guide) states that “Public sector management involves a unique set of challenges, especially when the one constant is change. Increasing demands for services, shrinking resources, and greater expectations for service all combine to form a dynamic environment.” The PVR guide further states that the PVR “. . . initiative is a framework designed to communicate to citizens the services currently being delivered and the results being achieved.” The following six performance metrics have been developed for AFD:

- *AFD*
 - Annual property loss due to fire.
- *EMS Division*
 - Dispatch for cardiac arrest calls.
 - Response time to cardiac arrest calls
- *Fire and Rescue Operations Division*
 - Response time to structure fire calls.
- *Fire Prevention Division*
 - Percentage of hotels that are inspected for life safety annually.
 - Percentage of 1/3 of commercial occupancies that are inspected for fire code violations triennially.

There is an additional performance measure regarding the management of workers' compensation claims. None of the above performance measures address AFD's training needs. Adequate Training Center PVR metrics may have facilitated earlier detection of the deficiencies described in this report.

- b. **Recommendation.** The Anchorage Fire Department Chief should ensure that written PVR metrics are established for Training Center operations.

- c. **Management Comments.** Management stated, “Management concurs with this finding and recommendation. We will ensure that specific metrics are established for AFD training center operations.”

- d. **Evaluation of Management Comments.** Management comments were responsive to the audit finding and recommendation.

Discussion With Responsible Officials. The results of this audit were discussed with appropriate Municipal officials on February 13, 2023.

Audit Staff:
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