

Agency Name	New Hampshire Police Standards and Training Council
Audit Name	Performance Audit
Audit Period	
Status Report Date	April 9, 2026

Summary of Audit Observations/Findings					
Number	Observation Title	Status [place X in status column]			
		Unresolved	Partially Resolved	Substantially Resolved	Fully Resolved
1	Require Psychological and Drug Screenings				X
2	Improve Applications and Certification Forms				x
3	Ensure Audits are Periodically Conducted				x
4	Improve Complaint and Disciplinary Process				x
5	Ensure Constant Management of Instructors				x
6	Incorporate Job Task Analysis into Curriculum Development			x	
7	Develop Performance Measurement System and Strategic Plan		x		
8	Improve Process Efficiency				x
9	Comprehensive Risk Management Needed			x	
10	Improve Administrative Rules			x	
11	Evaluate Efficiency of Internal Maintenance Crew				x
12	Define Role of Reviewing County Corrections Academy Curriculum				x
13	Ensure Proper Authority to Enter Non-Public Session				x
14	Disclose Financial Interests and Ensure Quorum Requirements are met				x
15	Formerly Adopt PSTC Recusal Practices				x
16	Ensure Corrections Advisory Committee Complies with Statute		x		

Observation 1: Require Psychological and Drug Screenings

Summary of Finding: We recommend the PSTC ensure all State-employed law enforcement officers are screened as required by law;

- Ensure all officers employed by political subdivisions are appropriately screened according to whether the subdivision has funds budgeted for such testing;
- Develop rules to describe acceptable psychological and drug screening tests;
- Develop methods to ensure local hiring authorities either conducted required testing or demonstrated exemptions.

Current Status: **Fully Resolved**. NH RSA 106-L:6, IV and VI now requires all police officers, state corrections and probation parole officers to successfully complete both Psychological and Drug Screening prior to being hired by the hiring authority, the parameters of each screening defined in administrative rule. In 2020, RSA 106-L:16 Psychological Stability Screening Fund was created to assist any law enforcement agency to pay for such screening, (as a reimbursement) for up to 750 dollars per officer. The hiring authority must provide an affidavit to PSTC indicating that the newly hired officer has successfully completed both screenings. During department audits, PSTC auditors check that these screenings were completed.

Observation 2: Improve Application and Certification Forms

Summary of Finding: We recommend PSTC management improve its forms to ensure the application and certification processes are efficient and collect all the required information. The PSTC should ensure all the forms are complete upon receipt and only accept complete and compliant forms.

Current Status: **Fully Resolved**. PSTC previously used paper applications of different types that needed to be filled out by hand by police agencies who would then mail, fax or hand deliver them back to PSTC. We now have a completely computerized application and certification management system that every law enforcement officer has access to, (levels of access are dependent on the officers' ranks and responsibilities). We utilize this system for all academy and in-service application procedures as well as for discipline and the reporting of misconduct. The system tracks when we need to send an application back to the home agency for amendments or corrections and it tracks when it is returned to us and by whom. The system is designed to not allow the submitting party to proceed if there are open required fields of information that are needed to be complete before the form is submitted.

Observation 3: Ensure Audits are Periodically Conducted

Summary of Finding: We recommend PSTC develop policies and procedures defining the PSTC audit function and ensure they are periodically conducted.

Current Status: **Fully Resolved**. PSTC has adopted protocol defining circumstances under which council staff will audit law enforcement agencies for compliance with Council Administrative Rules, including audits whenever a new chief law enforcement officer has been appointed or elected; when the council,

the director, or the director's designee, receives information from a source deemed credible, outlining a potential violation of council rules.

Observation 4: Improve Complaint and Disciplinary Process.

Summary of Finding: We recommend PSTC management improve the complaint and disciplinary processes by: increasing authority in administrative rule to allow for the disciplining of non-terminated officers and officers found not-guilty of criminal offenses; and develop mechanisms and procedures to ensure unreported criminal misconduct is addressed.

Current Status: **Fully Resolved.** RSA 106-L was amended in 2022 that expanded the statutory authority of PSTC to receive and investigate allegations of misconduct and when sustained, to impose sanctions. RSA 106-L: 17 creates the Conduct Review Committee, (CRC) that oversees this process. RSA 106-L:2 clearly defines what misconduct is. RSA 106-L:20 mandates agencies to report to PSTC any allegation of misconduct that fits the definition. RSA 106-L:21 mandates agencies to investigate allegations of misconduct and report their findings to the CRC for review to include cases where an officer is arrested but found not-guilty. Any sustained findings by the CRC are then presented to the Council for disciplinary proceedings. PSTC now maintains a public portal to receive allegations of misconduct and provides a public list of sustained findings misconduct.

Observation No. 5: Ensure Consistent Management of Instructors.

Summary of Finding: We recommend the PSTC improve policies and practices to ensure the consistent management of instructors by developing credential verification and instructor approval processes for non-PSTC instructors with some degree of parity to the treatment of PSTC staff instructors, setting a minimum level of instructor training required and ensuring those standards are consistently met with written evaluations, and reducing the level of monitoring activities of non-PSTC instructors after instructional proficiency has been demonstrated and documented by the PSTC.

Current Status: **Fully Resolved.** Amendments to our Instructor Certification and Approval protocol have been approved by the Council and implemented. Those protocols include an application and approval process for all outside instructors, a policy that defines the requisite level of instructor training and experience required and the expectations of behavior by instructors, and the use of written instructor evaluation to ensure delivery of quality instruction. We have substantially reduced the level of monitoring of instructors once instructional proficiency has been demonstrated and documented.

Observation No. 6: Incorporate Job Task Analysis into Curriculum Development.

Recommendation: We recommend PSTC seek funding to ensure an updated job task analysis is completed and the results integrated into their curriculum.

Current Status: **Substantially Resolved.** PSTC secured funding to hire a company to conduct a JTA in the last budget cycle, developed and released an RFP to outline the scope of the project and to identify vendors and ultimately awarded a contract to Stanards and Associates of Chicago IL to conduct the JTA. The JTA was conducted and the results of the JTA were submitted to PST on June 13, 2025. PST staff

have concluded all meetings with state SMEs of the various broad topic groups that reviewed the JTA findings held up to the present curriculum to ensure all topics identified in the JTA are being addressed in the curriculum. Their overall findings are being captured in a summary analysis to present at the council. The only outstanding piece of the project that the vendor is to complete is the Fitness Test Analysis study that was incorporated into the JTA project. This portion of the project was put on hold when the council discovered that HB 1805 had been filed to initially make changes to the fitness testing and which has now been amended to eliminate the three-year fitness testing. Next steps will be dependent on what happens with this bill.

Observation No. 7: Develop Performance Measurement System and Strategic Plan.

Recommendation: We recommend PSTC complete a comprehensive strategic plan which identifies goals and objectives for the PSTC and then design performance measures which can be tracked to determine the organization's achievement of these goals and objectives.

Current Status: **Partially Resolved but with explanation.** To date, the PST Council has not proactively developed a formal strategic plan that identifies formal goals and objectives for the agency. In essence, this LBA audit, along with the summary report and Executive Order 2020-19, based on the work of the Governor's Commission on Law Enforcement Accountability, Community and Transparency (LEACT) from June 16, 2020, have acted as this agency's strategic plan. Along with the 16 observations contained in this LBA report, there were a total of 48 recommendations from the LEACT EO 2020-19, and PST was responsible to address 22 of them.

The Council has discussed at the last two council meetings the desire to conduct a retreat so that they can devote full focus on reviewing curriculum, reviewing facility needs and establishing a strategic plan moving forward. The Council has considers this as a priority project but due to the tight timeline on our complete revision of our administrative rules and adhering to all JLCAR process requirements to complete this, the retreat, to include the development of a strategic plan must be deferred until the rules process is completed.

Observation No. 8 Improve Process Efficiency.

Recommendation(s): We recommend PSTC work with the Department of Information Technology to reengineer its processes for efficiency and identify or develop suitable software to assist PSTC in achieving its primary responsibilities efficiently.

Current Status: **Fully Resolved.** PSTC has contracted with a software company that provides us with a full Record Management System and Learning Management System. The system allows for PSTC to maintain a comprehensive "Cradle to Grave" record of every certified officer in the State of New Hampshire. This record system allows PSTC to track all hiring, training and disciplinary records of all officers and streamlines the submission of all annual agency compliance reporting mandates.

Observation No. 9: Comprehensive Risk Management Needed.

Recommendation: We recommend the PSTC fully implement a risk management policy which includes a comprehensive written risk assessment.

Current Status: **Substantially Resolved**. We have developed and promulgated an agency policy titled RISK MANAGEMENT PROGRAM . We have established a Risk Safety Committee who have been meeting monthly to assess risk within the building and are developing a risk management plan. We are developing a comprehensive safety program and conducting job hazard analysis. Risk is being addressed on an ongoing basis with repairs being made to unsafe conditions within the building and employee training increased to address specific hazards. All academy training staff is now required to be trained and certified in first aid, CPR, and AED use. New first aid equipment has been added throughout the facility. New vehicles for recruit training have been purchased to replace vehicles that would not pass inspection. We submitted a capital budget request for funds to improve building security, restrict and control building access, and video surveillance upgrades. Those requests have been approved, and the video and door access projects have been completed, and Public Works has assigned a number to our capital improvement project to secure the main entranceway to the building. Further, our staff is developing an agency emergency response plan and a Continuation of Operation Plan (COOP) plan to meet accreditation standards for our agency.

Observation No. 10: Improve Administrative Rules.

Recommendations: We recommend the PSTC improve administrative rules by ensuring rules are consistent with statute, updated timely, and all forms requiring information from external parties are properly adopted.

Current Status: **Partially Resolved**. PST Council has hired a part-time employee to oversee and coordinate the efforts of the Council to complete the updating of our Administrative Rules. The Council is now in the process of conducting all mandatory hearings and gathering all public testimony as required by JLCAR. A formal timeline has been established regarding all mandated steps in the rule making process and that timeline is included as an appendix to this report. The Council recognizes that this project is priority A-1 and that must be accomplished within the established timeline.

Observation No. 11: Evaluate Efficiency of Internal Maintenance Crew.

Recommendation: We recommend PSTC management explore opportunities to combine maintenance services with DAS and determine whether to keep its internal maintenance crew independent. Its assessment should be reported to the relevant legislative oversight committees for their review.

Current Status: **Fully Resolved**. We met with DAS Bureau of Plant and Property Management officials at PSTC. We toured the facility and discussed the potential operational advantages of shared services with DAS. After consideration of several aspects of the maintenance function at PSTC, we determined that overall, shared services with contracted custodial services. PST eliminated two full time maintenance staff and obtained a third-party vendor through the States's RFP process for such services at a cost savings. DAS personal advised that they employ very limited specialized personnel and would be unable to provide shared services to PSTC. Fleet Maintenance: The auditors note that PSTC maintains an internal

garage to perform inspections and minor repairs to vehicles, and suggests that it may be more efficient to send PSTC vehicles to a larger state garage or a private vender. PSTC currently sends vehicles to private venders for inspections and major repairs. Our mechanic performs basic and minor repair work. Most vehicles in the fleet are used as emergency driver training vehicles. The driving course includes intensive emergency driver training on an 800 foot driving pad involving quick starts and stops, tight corners with rapid acceleration and hard braking. The nature of the course results in extreme tire and brake wear. The driving course is conducted for two solid weeks during four full time police academies and on weekends during one part time academy each year. An on-site mechanic is important to reduce interruption to the program. Outsourcing vehicle maintenance while the driving course is in session is not feasible.

Observation No. 12: Define Role in Reviewing County Corrections Academy Curriculum.

Recommendations: We recommend the PSTC adopt rules defining the approval and oversight of the county corrections academy curriculum, including: the frequency and scope of review, and the degree of autonomy delegated to the NHAC to implement an approved curriculum.

Current Status: **Fully Resolved**. The PSTC has adopted protocol for consistent annual review of the County Corrections Academy curriculum and allows that the NHAC may make non-consequential modifications to the Council approved curriculum, including modifications to the order courses are presented, and minor changes in the length of specific courses, without prior Council approval.

Observation No. 13: Ensure Proper Authority to Enter Non-Public Session.

Recommendations: We recommend PSTC management work with DOJ to develop policies and procedures to ensure proper authority is cited when entering into non-public session for the frequent scenarios before PSTC. The Legislature may wish to clarify whether exemption from a public setting under RSA 91-A:3, II(a) is for the protection of any public employee before any public body or whether an employer-employee relationship is required.

Current Status: **Fully Resolved**. The PSTC has reviewed and updated their Non-Public Session Worksheet which serves as a guide for members to assure proper authority is cited when entering into non-public sessions. Council staff and the DOJ have reviewed minutes of all non-public sessions entered into during the audit period to ensure proper authority is cited. The DOJ review found that none of the non-public sessions were entered contrary to law.

Observation No. 14: Disclose Financial Interests and Ensure Quorum Requirements are met.

We recommend the PSTC management: develop policy and procedures to ensure compliance with the financial disclosure statute and periodically review members' compliance; and only eligible members conduct PSTC business. We also suggest the Legislature consider clarifying RSA 15-A:6 regarding whether failure to file annual financial disclosures should prohibit public officials from serving in their appointed capacity.

Current Status: **Fully Resolved**. Council members have been reminded of their obligation to file the disclosures in a timely manner. Each December, members will be provided with a financial disclosure form for the following year and reminded of the deadline. Members will not be allowed to vote on any council action unless they have filed the disclosure. Council staff will review the Secretary of State web site to verify that disclosures have been filed and will advise the Council Chair of any delinquent filing. Also, the non-State employee member of the Corrections Advisory Committee has been informed of his obligation to file a Financial Disclosure Form and he has filed the form with the Secretary of State.

Observation No. 15: Formerly Adopt PSTC Recusal Practices.

Recommendation: We recommend PSTC adopt formal recusal practices in policy by defining potential conflicts of interest for PSTC members and determining when a recusal from the meeting or abstention from voting is the appropriate remedy to avoid a potential conflict.

Current Status: **Fully Resolved**. PSTC has consulted with the DOJ and has adapted a recusal protocol to include a recusal guide available to members during Council meetings.

Observation No. 16: Ensure Corrections Advisory Committee (CAC) Complies with Statute.

Recommendation: Develop policies and procedures to ensure the Corrections Advisory Committee consistently complies with statute and continues its efforts to utilize the Committee.

Current Status: **Partially Resolved**. The committee membership has been updated and includes only individuals authorized by statute. The PSTC has adopted protocol governing committee membership and practice, consistent with statute. The Committee convened during 2020 and 2021 but has not convened since then. The reason for the CAC not convening is that the NH Dept of Corrections has struggled to have the CAC membership positions, as defined in RSA 106-L, filled with any consistency. With new leadership in place at NH DOC, PST will re-establish a regular meeting pattern to meet the 2/year statutory mandate. It is my belief that some consideration should be given to changing the membership of the committee with members who might have more insight regarding the basic requisite knowledge of a 1-5 year corrections officer.