The Bill Blackwood Law Enforcement Management Institute of Texas

Regionalized State Training Academies:
A Better Use of Law Enforcement
Training Resources

An Administrative Research Paper Submitted in Partial Fulfillment Required for Graduation from the Leadership Command College

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ABSTRACT

The cost benefit analysis of regionalized state training academies is relevant to contemporary law enforcement because it critically examines the current training expenditures by state and local law enforcement agencies in Texas. As the federal and the state governments are confronted with significant budget deficits, it is incumbent upon law enforcement professionals and executives to critically review the expenditure of precious law enforcement resources on current training practices. The Texas Commission on Law Enforcement Officers Standards and Education (TCLEOSE) currently regulates the operation of regionalized and single jurisdiction law enforcement training academies.

The purpose of this research is to examine the costs of those training academies and determine the most cost effective manner in which to conduct the basic training of law enforcement officers in the state of Texas. The method of inquiry used by the researcher included: personal interviews, a review of a previous analysis of regionalized training academies, law enforcement related Internet websites, law enforcement and criminal justice periodicals, academic studies, and a survey of current law enforcement training practices distributed to 24 survey participants.

The researcher discovered that local and state agencies are currently expending precious training resources in the most expensive option, which is single jurisdictional academies, and are even requiring prior law enforcement officers newly hired by those departments to retrain in their own agency's training academy. The justification of this practice was the desire for standardized training within the department or the existence of specific legislation unique to the law enforcement role of that agency.

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INTRODUCTION

The problem or issue to be examined considers whether or not some state and local law enforcement agencies should be operating their own training academies or working with other agencies to share the burden of training costs. An additional component of this paper will to be to examine the costs associated with the practice of some agencies expending precious law enforcement training dollars on the re-training of recently hired, experienced law enforcement officers at the agency's own academy. The relevance of this practice to law enforcement is to determine whether or not this practice is necessary or if it is a waste of taxpayers' resources. If this practice is indeed wasteful, then the costs need to be quantified and forwarded to the legislative bodies which govern those law enforcement agencies.

The purpose of this research is to examine the costs of training in the different academies, the number of officers re-trained, the justifications for this practice, and to quantify the associated costs of the perpetuation of this institutional culture. It is necessary to determine whether or not agency specific academies are necessary or if the Texas Commission on Law Enforcement Officer Standards and Education (TCLEOSE) has established sufficient training regulations to guarantee an acceptable level of standardization at accredited law enforcement academies in Texas. Another research question to be examined is whether or not the three law enforcement agencies being examined are spending a significant portion of training funds unnecessarily repeating basic peace officer training in their own academy.

The method of inquiry used by the researcher included: a review of articles, departmental policies, training records, Internet sites, periodicals, law enforcement

journals, a survey distributed to three survey participants, and personal interviews of law enforcement training professionals. The intended outcome or anticipated findings of the research are that the three law enforcement agencies in question are needlessly expending training funds on the training of newly hired law enforcement officers who have already satisfied the licensing requirements of TCLEOSE. The field of law enforcement will benefit from the research or be influenced by the conclusions because the findings of this report may lead to changes in departmental policies, regulations, or even legislation to prevent the future waste of law enforcement training funds.

REVIEW OF LITERATURE

One of the first things that the researcher discovered about this topic is that there has been very little published on this topic. There could be a number of reasons for the dearth of information on this topic. One reason could be that many states already utilize a statewide training academy for all law enforcement officers. Some of these state academies are run by the licensing or law enforcement regulatory agency for that state. Other states operate a local law enforcement training academy in the same facilities as state police academies. Though Texas is not unique in the decentralized manner by which it trains it police officer recruits, little has been published on the cost effectiveness of its system.

In the review of the available literature on the regionalization of law enforcement training, the researcher discovered that Dr. Albert Pasquan published an article on interagency cooperation in 1973. In that early article, Pasquan (1973) identified the problem of the limited resources of law enforcement agencies and the ability of those agencies to balance operational needs and constraints with adequate police training.

He correctly observed that many law enforcement agencies have overlapping jurisdictions but fail to coordinate in the training of their police officers. Furthermore, Pasquan (1973) noted that the consolidation of police services through interagency cooperation and inter-local agreements are effective ways to reduce costs, thereby lessening the burden on taxpayers. If his hypothesis was correct, Texas would currently be operating the least cost effective method in the training of police officers, since many of the larger jurisdictions rely on the their own independent academies.

Some 20 years after Pasquan's (1973) article was published, Fulton (1992) published a related article. Though Fulton (1992) encouraged agencies to utilize their own training assets available within their own department, he also encouraged local agencies to combine their training assets. Fulton (1992) proposed the idea of law enforcement agencies combining what little training resources they had to lessen the individual agency burden. He pointed law enforcement executives towards schools and enlisted the support and cooperation of local criminal justice programs in academic institutions, such as colleges and universities.

Yet in 1990, Don Martin of the Garland Police Department in Texas authored a paper for the Law Enforcement Management Institute of Texas (LEMIT) entitled, "An Analysis of a Multi-jurisdictional Training Facility." Martin (1990) cited that law enforcement training academies operated by various local councils of government (COG) in Texas since the 1970s as a means to spread the costs between participating governmental agencies. Martin understood the reasoning for the creation of multi-jurisdictional academies to be simply a "matter of economics" (p. 3). He cited the costs associated with the acquisition, construction, staffing, and operation of a single

jurisdiction academy to be quite costly. In his paper, Martin (1990) proposed the creation of an academy between two single jurisdictions to share the costs. Martin (1990) thought that the council of governments law enforcement academy could not meet the expectations of each of the jurisdictions "since a COG academy must at times train police officers from as many as 20 different cities" (p. 2). He believed that an agreement between two cities would allow for more department specific training.

According to present day TCLEOSE rules, the researcher knows that TCLEOSE requires additional department specific training after the basic academy through the employing agency's field training officer program prior to the awarding of a basic peace officer license (TCLEOSE, 2009). By these rules, this department specific training must occur at the employing agency, thereby freeing the academy to only instruct the basic peace officer curriculum.

In a LEMIT paper authored in 1995 by John T Gerami of the LaMarque Police Department, another analysis of single and multi-jurisdictional academies was conducted from the perspective of possibly developing a La Marque police academy. Gerami (1995) recognized that multi-jurisdictional academies are a cost savings measure and are helpful to smaller agencies with insufficient budgets to operate their own academy. Like Martin (1990), Gerami (1995) concluded that multi-jurisdictional academies were unable to provide sufficient department specific training. More interesting was the statement by Gerami (1995) that one of the reasons agencies should not use multi-jurisdictional academies was that agencies were unable to guarantee the quality of instruction.

According to TCLEOSE rules, the commission monitors and audits the testing of basic peace officer instruction (TCLEOSE, 2009). The TCLEOSE rules also authorize the Commission to suspend academies for poor academic performance in the instruction of peace officers (TCLEOSE, 2009). Finally, in the summary portion of Gerami's (1995) paper, he cited a U.S. Supreme Court decision that stated "inadequate police training may result in the imposition of municipal liability under 42 USC 1983 (p. 17). The supposition by Gerami (1995), based on the court's ruling that agencies should operate a single jurisdictional academy to insure proper training, is counter-intuitive. By operating a single jurisdictional academy for the purposes of basic peace officer instruction, the municipality or other agency would be opening the door to a constant evaluation and scrutiny of the academy's performance, thereby increasing liability. If agencies rely solely on a multi-jurisdictional academy operated in a council of governments or in an academic institutional such as a college or university, the liability burden would logically be shifted to the larger entity.

There has been few definitive modern studies of the cost effectiveness of state regionalized training academies, but the U.S. Department of Justice (DOJ) did publish a study of state and local law enforcement training academies from 2002. In the report, the Bureau of Justice (2005) statistics found that, nationwide, police training academies spent more than \$725.6 million on basic law enforcement training (DOJ, 2005). Each of these academies spent anywhere from roughly \$261,000 to \$6.3 million annually, with the average being \$1.2 million (DOJ, 2005). In the study, researchers determined that the basic per trainee cost varied widely. State and regional academies spent approximately \$11,200, while municipalities spent more than \$36,200 per trainee (DOJ,

2005). The most inexpensive academies to operate, by far, were those contained within academic institutions such as universities and colleges, with an average per trainee cost of just \$4,600 (DOJ, 2005). The survey also found that the average number of instructional hours was 720, with most of the state academies requiring an additional 100 hours of training (DOJ, 2005). By Texas standards, each perspective law enforcement trainee must complete a total of approximately 620 training hours basic peace officer course. The study also found that the expenditures of these academies varied by the number of full-time staff. Those academies with a staff of 10-24 full time instructors averaged a cost of \$640,000 per academy, while 25-49 full time instructors raised the average academy cost to \$942,000 (DOJ, 2005). A final interesting note regarding the reward of college credit to officers completing the basic police academy found that cadets were more likely to be awarded college hours in regional and college or university academies.

The National Institute of Justice Research for Practice (2004) found that many of the police officers leaving their agency were leaving within two years for another police department (NIJ, 2004). It also found that applicant processing took anywhere from 8 to 11 months, and only 9 out of 10 applicants were completing their training (NIJ, 2004). The study found an average attrition rate of nearly 8%, with some 45% of those officers leaving smaller departments for other law enforcement opportunities (NIJ, 2004). Of that 8%, 24% of the officers leaving larger departments remained in the law enforcement field (NIJ, 2004). These statistics revealed that a significant portion of officers are moving between departments and may be subjected to additional processing and training requirements.

METHODOLOGY

The research question to be examined considers whether or not law enforcement agencies in Texas are utilizing the most cost effective manner in conducting basic law enforcement training through the operation of single jurisdiction, multi-jurisdiction, or regionalized training academies. There are many costs associated with operating a training academy. These costs include, but are not limited to, capital expenditures, consumable goods, and salaries. The researchers will examine the total costs to train police applicants and attempt to quantify the savings that could be achieved if the most cost effective method was to be utilized.

The researcher will examine three single jurisdictional law enforcement agencies to determine how many basic police officers their academy trained in 2002. The three single jurisdictional agencies will be the Texas Department of Public Safety (TXDPS), the San Antonio Police Department (SAPD), and the Dallas Police Department (DPD). Additionally, the researcher will attempt to determine through public information requests, personal interviews, and available on-line documents what the budgetary academy expenditures were for each of the single jurisdictional departments. This will then be compared to the U.S. Department of Justice training costs for accuracy purposes. A further component of this research will include an attempt to determine how many of the basic peace officer academy graduates in these single jurisdiction agencies had prior law enforcement training. This repetition in basic law enforcement training has an associated cost.

The researcher hypothesizes that the costs associated with single jurisdiction law enforcement training academies are the most expensive means to train police

applicants. Furthermore, agencies that utilize multi-jurisdictional training academies have a reduced training cost per police applicant. Finally, the costs associated with the required repetition of basic police office instruction are substantial.

The method of inquiry will include: personal interviews of law enforcement executives, public information requests, a survey of 29 Texas law enforcement agencies, on-line searches of budgetary information, a review of law enforcement articles, and academic journals.

The instrument that will be used is a survey questionnaire to measure law enforcement agencies expenditures for basic peace officer training. The researcher will also query questionnaire respondents to determine if their training is provided by a single jurisdictional, multi-jurisdictional, or regionalized training academy. The size of the survey will consist of seven questions and one identifying category, distributed to 29 survey participants from state, county, municipal, or other law enforcement agencies of Texas. The response rate to the survey instrument resulted 24 of the 29 surveys being returned. The information obtained from the survey will be analyzed by identifying whether or not those law enforcement agencies operate a training academy, whether or not those agencies rely on a trained pool of applicants, and whether or not the respondent agencies rely on another agency to provide training for their police applicants.

FINDINGS

The researcher obtained the number of police officers recruits trained by the TXDPS and SAPD from the historical data available through TCLEOSE. The total number of recruits trained through the single jurisdiction academy run by the TXDPS

during the calendar year 2002 was 214. The total number of recruits trained in the single jurisdiction academy run by the SAPD was 98. To obtain the number of police recruits trained by the DPD, the recruiter requested the information from DPD directly. The number trained in the single jurisdiction DPD academy during the calendar year 2002 was 162.

The researcher was unable to determine the exact costs per cadets of these academies through available public records. One of the significant complicating factors was that these recruits were trained during two separate calendar years. The researcher was able to obtain the TXDPS line item budget for fiscal year 2005, which indicated that the budget for recruits was \$1,559,049 (TXDPS, 2005). According to the TXDPS annual report, two cadet classes graduated in 2005, with a total of 211 cadets (TXDPS, 2005). If these two cadet classes were both part of the 2005 DPS budget, the training cost would be \$7,885 per cadet. If the cadet class started in late 2004 was part of a different budget, the costs would rise to over \$12,000 per cadet.

Another factor to be considered is the costs associated with any in-service training that may be conducted by the academies. The number of recruit graduates has been included in a chart below, and by utilizing the average costs cited in the 2005 DOJ study of 2002 training cost, the researcher attempted to approximate the costs below. Additionally, utilizing the same DOJ cost estimates, the researcher has approximated the costs of training in a regionalized multi-jurisdictional academy and identified the potential savings.

Calendar Year 2002	TXDPS	SAPD	DPD
Trained Recruits	214	98	162
DOJ avg. est. costs	\$11,200	\$36,200	\$36,200
Total est. cost	\$2,396,800	\$3,547,600	\$5,864,400
DOJ avg. est. costs Regionalized	\$4,600	\$4,600	\$4,600
Training Academy (College/University)			
Total est. cost	\$984,400	\$450,800	\$745,200
Estimated Savings	\$1,412,400	\$3,006,800	\$5,119,200

Table I. DOJ estimated training costs for three Texas law enforcement agencies.

The researcher learned that in the immediate geographic area surrounding the TXDPS, SAPD, and DPD single jurisdiction training academies, there are regionalized multi-jurisdictional training academies being operated in local colleges and universities, as well as by a local council of governments. Through personal interviews of law enforcement professionals and executives, as well as publicly available data, the researcher was able to determine that the costs of these academies is significantly lower than the DOJ averages. The Capital Area Council of Governments, which operates a regionalized law enforcement training academy for central Texas, currently charges, according to their agency website, \$1,200 for the basic peace officer academy. The Alamo Area Council of Government's Law Enforcement Academy which services the San Antonio metropolitan area, currently charges \$1,500 for the basic police officer academy. An additional regionalized law enforcement training academy is available at the San Antonio College.

The North Central Texas Council of Governments, which services the Dallas-Ft. Worth area, operates a regionalized law enforcement training academy and currently charges \$1,500 for the basic police officer course according to their website. According to the City of Dallas' 2008-2009 Annual Budget for Public Safety, the Dallas Police

Academy was authorized to provide for the basic training of 300 police recruits as well as in service and firearms training for a total cost of \$21,204,647.00 in fiscal year 2007-2008. If the Dallas Police Department utilized pre-existing training resources available at the North Central Council of Governments, the total training costs for training 300 police recruits would be \$450,000.00. During an interview of a Dallas Police Department training professional, the estimated cost of training a police recruit was approximately \$84,000. That figure is significantly higher than the DOJ national average for a single jurisdictional municipal police academy, which is \$36,200.

The researcher also conducted a survey of Texas law enforcement agency executives participating in Module I of LEMIT in October of 2007. This survey was designed by the researcher to determine the training source and costs for the agencies participating. The survey sample was limited to a total of 24 agencies, and of that sample, 15 were municipal police departments, 4 were county departments, 4 were state agencies, and 4 were other, including school district police agencies.

The questions dealt specifically with training academies, the training of new police officers, and training costs. The first question was to determine if the respondent agency operated its own training academy for the purposes of training cadets or basic peace officer instruction. The second question was to determine if the respondent agency contracted with a regional training academy to provide cadet training services. The next question was to determine if the respondent agency only hires prior trained officers. The researcher also inquired if the agency required all of the newly hired officers to complete a basic cadet program. If the response was affirmative, the researcher then requested the agency provide the number of officers that were trained

in 2002. The researcher inquired if the agency hired only prior law enforcement officers. If the response was yes, the researcher then asked the number of prior law enforcement officers that were hired in 2002. To inquire about lateral transfers, the researcher then asked if the agency has an abridged academy for those officers. If the agency responded yes, then the researcher inquired about the number of officers which attended those abridged academies. Finally the researcher inquired about the agency's annual budget for training newly hired officers for the 2002 fiscal year.

Below is a chart of the results:

2002 Training	Municipal	County	State	Other
Participants	15	4	4	3
Operate single jurisdiction police	2	0	1	1
academy				
Contract with Regional Training	8	1	0	0
Academy				
Hires only trained officers	5	1	1	2
Requires all new officers to	7	1	1	1
complete basic academy				
How many officer were hired in	35	Unknown	Unknown	60
2002(total of survey participants)				
How many of those were prior law	14	0	4	0
enforcement				
Abridged academy for prior law	3	0	0	0
enforcement				
Training budget in 2002 (cost	\$400-	\$400	Unknown	Unknown
range per officer)	\$35,000			

Table II. Law enforcement agency training methods and costs survey results.

The results of the survey were somewhat consistent with the findings of Matthew Hickman in his 2005 DOJ study on state and local law enforcement training academies 2002 training costs in so far as there was a wide range in costs (DOJ, 2005). Some of the municipal departments paid as little as \$400 to train new officers, while one paid \$1,310 to a local academy operated by local Councils of Governments. Another paid

\$4,025, of which 75% of was refunded by the COG. The highest cost for a municipal police department was \$35,000, which is just under the \$36,200 national average for municipal police departments. Of the 95 police officers hired and trained by the agencies of the survey respondents, 28 of those officers were prior law enforcement officers who were required to repeat the training as a condition of their new employment. That is more than 25% of the officers hired. For one of those agencies, that requirement cost the agency \$75,000 in 2002. For another one of the respondent agencies, which shares a basic academy with another local law enforcement agency, the agency paid \$10,480 to re-train the officers. Unfortunately, there was insufficient budget data to properly analyze the state and other law enforcement agency categories.

DISCUSSION/CONCLUSIONS

The problem or issue examined by the researcher considered whether or not law enforcement agencies are utilizing the most cost effective means to provide training to their officers, thereby being good stewards of taxpayer's money. The purpose of this research was to determine the most cost effective manner to conduct police training in order to save money for law enforcement agencies as well as the taxing jurisdictions which support them. The research question that was examined focused on the costs associated with the operation of single jurisdictional police academies, such as local or state police academies, and multi-jurisdictional and regionalized academies. The researcher hypothesized that regionalized multi-jurisdictional academies are the most cost effective method to train law enforcement officers.

The researcher concluded from the findings that regionalized multi-jurisdictional law enforcement training academies are, indeed, the most cost efficient manner to train

law enforcement officers, and governmental departments or agencies currently operating single jurisdiction academies could recognize substantial savings if they began to utilize regionalized training academies. The findings of the research did support the hypothesis. The reason why the findings did support the hypothesis are probably due to single jurisdiction academies relying on one budget source to provide training services. These academies have significant personnel and capital expenditures that must be maintained by a single budget course. Regionalized multi-jurisdictional agencies rely heavily on the pre-existing infrastructure contained in academic or governmental institutions, and the costs are spread out between multiple budget sources, thereby reducing the overall costs per agency. Local councils of governments throughout the state operate regionalized training academies, and law enforcement training costs are spread throughout jurisdictions participating in the council. Some of the funding to support those academies even comes from the state. In fact, cities like Dallas and San Antonio are already participating in their council of governments, and since they are operating their own academy, those governments are failing to take full advantage of those memberships and paying above and beyond what is necessary.

The researcher has encountered significant resistance to the idea of regionalized training academies when discussing the hypothesis with officers from larger police organizations. Some of the reasons cited are that they are dissatisfied with the quality of police training and regionalized training academies do not teach the police cadets the standing orders, policies, and procedures of individual departments. The researcher can only conclude that this is the basis for requiring officers with prior law enforcement training to repeat training in single jurisdictional academies. With the current attrition

rate of police departments as 8% percent of officers in the first two years, this can be a costly endeavor for police agencies. If 10% of annual police recruits to DPD, SAPD, and TXDPS are prior police officers, then the costs in 2002 were, according to DOJ estimates, \$586,440, \$352,800, \$239,680 respectively. These three law enforcement agencies alone would have spent over \$1,000,000 in 2002 to retrain prior law enforcement officers. This practice is common in the larger police organizations in Texas, and the annual statewide cost would be significantly higher. Each of these agencies does, however, have field training officer programs where the department's standard operating procedures and standing orders could be instructed, thereby institutionally familiarizing them with their new agency.

Undoubtedly, there are limitations that might have hindered this study. One of those limitations is a result of the fact that the most current DOJ study of law enforcement training costs this researcher could find was for the 2002 budget year (DOJ, 2005). These costs have likely increased in the past seven years through inflation and the substantial increases in costs of fuel and ammunition. Another limitation is that the researcher was unable to determine an exact number of previously trained police applicants who are required to repeat basic police training in those agencies operating single jurisdiction academies. The researcher was only able to approximate a percentage of applicants with prior law enforcement training and experience through personal interviews of agency personnel involved in training operations. For further exploration of this issue, the researcher recommends that each academy report prior law enforcement officers repeating the basic peace officer

instruction to TCLEOSE. This could be done on the training roster submitted to TCLEOSE or on the F-1 form that notifies TCLEOSE of a police officer's employment.

There were also limitations to the survey since the survey population was limited to only the 24 agencies participating in the Leadership Command College in the fall of 2007. There were more than 3,000 law enforcement agencies in the state of Texas at that time; therefore, that is a significantly limited sample of the population. Finally, some of the participants were unable to complete all of the data fields since the researcher was requesting dated historical information.

The study of the costs associated with the operation of training academies is relevant to contemporary law enforcement because it highlights cost savings options available to legislative bodies in difficult budgetary times. If legislative bodies utilize the most cost effective manner to save in basic police training costs, governments could reduce or avoid the potential of staffing cuts, diminished benefits, or salary reductions whenever administrators are confronted with budget shortfalls and mandatory cuts in spending. In 2009, with the national and state economy in recession, it is incumbent upon police executives and governmental bodies to utilize the most cost effective manner to staff police agencies. Furthermore, any savings associated with the utilization of training academies could be transferred to law enforcement operations, increased professionalism through advanced law enforcement training, and increased fringe benefits for law enforcement personnel.

In conclusion, the researcher proposes that the state of Texas make significant changes to the current law enforcement training structure in Texas. More specifically, TCLEOSE needs to restrict the number of academies to those operated by the 24 local

councils of government, as well as those operated by local community colleges and state universities. Local councils of government and institutions of higher education could continue to work with client agencies to provide the highest quality of training in the most cost effective manner. Any additional modifications or additions to the basic peace officer instruction could be presented to TCLEOSE for consideration and adoption.

The researcher concludes that this reduction in the number of authorized training providers may have some additional impacts. With only councils of governments and institutions of higher learning providing basic law enforcement training, this will potentially lower the liability responsibility of any single jurisdiction that has historically operated its own basic law enforcement academy. There would be a more standardized training program throughout the state. Furthermore, it would create a single pool of qualified law enforcement professionals and eliminate the wasteful practice of requiring experienced officers to repeat basic peace officer instruction.

The standardization of training throughout the state of Texas would have significant annual cost savings for taxpayers, as well decreased future infrastructure and capital expenditures. Taxpayers would no longer need to pay the costs of the mandatory repetition of basic peace officer instruction for officers who move between cities and communities in Texas. With attrition rates in law enforcement rising throughout the nation and Texas and a change in the labor pool to a more transitory workforce, the researcher believes that these changes are necessary on maintaining a sufficient pool of qualified applicants in the most cost effective manner.

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APPENDIX

ORGANIZATIONAL SURVEY

	STATE		MUNICIPAL (circ	ele one)	COUNTY	OTHER			
	ng practices. Does your ag	gency op		g acade		epartment's hiring a			
2). YES	Does your agency contract with a regional training academy to provide cade training services? (If yes, proceed to question #4.) NO								
3.) YES	Does your ag survey, thank	-	ly hire only trai	ned offi	cers. (If ye	s, you are done with	1		
4.) YES	Does your aç	gency re	quire all new hi	res to c	omplete a	basic cadet program	า?		
	If yes,	how ma	ny officers wer	e traine	ed in 2002?				
5.) YES	Does your aç	gency hir NO	e prior law enf	orceme	nt officers?				
		how ma	ny prior law en —–	forcem	ent officers	were hired in			
6.) YES	Does your aç	gency ha NO	ve an abridged	d acade	my for thos	e officers?			
	If yes,	how ma	ny officers atte	nded th	ose acade	mies?			
7.)	What was yo	our agend	cy's budget for	training	newly hire	d officers during 200	02?		
Capta Office PO Bo	e return this so in Forrest A. Note of the Attorne ox 12548 n, Texas 7871	Mitchell ey Gener MC-065	al			Fax (512) 469-3187	7 .		