CITY OF SAN ANTONIO

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March 14, 2022

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SUBJECT: Audit Report of San Antonio Police Department Uniform Crime Reporting

Mayor and Council Members:

We are pleased to send you the final report of the San Antonio Police Department Uniform Crime Reporting Audit. This audit began in March 2021 and concluded with an exit meeting with department management in December 2021. Management's verbatim response is included in Appendix B of the report. The San Antonio Police Department management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
City of San Antonio

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CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR

Audit of San Antonio Police Department

Uniform Crime Reporting

Project No. AU21-022

March 14, 2022

Kevin W. Barthold, CPA, CIA, CISA
City Auditor

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the San Antonio Police Department (SAPD) specifically the Uniform Crime Reporting (UCR) process. The audit objectives, conclusions, and recommendations follow:

Determine if crime statistics are accurately reported and there are adequate controls over the collection, calculation, and reporting of these statistics.

The SAPD is accurately collecting, calculating, and reporting crime data. Staff are appropriately reviewing incident reports to ensure all offenses are accurately recorded with the appropriate information. Additionally, the SAPD is reporting crime data according to National Incident Based Reporting System (NIBRS) standards and achieved certification on January 25, 2021. To achieve NIBRS certification, TxDPS requires law enforcement agencies to upload monthly crime data with an error rate of less than 4%. From November 2020 to August 2021, the SAPD averaged less than a 1% error rate which is well below this requirement. Also, the SAPD UCR Office is reporting crime data to the Chief of Police on a monthly basis.

However, some areas could be improved. Several crime reporting quality controls are still being developed and finalized as a part of the recently implemented (November 2020) NIBRS standards and Mark43 system.

We recommend the Chief of Police continue the development and finalization of quality controls for reporting crime data to facilitate NIBRS standards for the following processes: structured training program, quality assurance reviews (QARs) and incident report review metrics. This should also include documentation of all significant controls.

San Antonio Police Department management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix B on page 6.

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Background

The Federal Bureau of Investigation's (FBI) Uniform Crime Reporting (UCR) Program is a nationwide, cooperative statistical effort of more than 18,000 federal, state, city, university and college, and tribal law enforcement agencies voluntarily reporting data on offenses reported or known. The program's primary objective is to generate reliable information for use in law enforcement administration, operation, and management. To accomplish this objective, the FBI implemented the National Incident-Based Reporting System (NIBRS) in which law enforcement agencies nationwide report data on each offense and arrest within 28 offense categories made up of 71 specific crimes called Group A offenses and an additional 10 Group B offenses. Group A are the more serious offenses including homicide, aggravated assault, robbery, and rape. To streamline the collection and ensure consistency of UCR data, state-run UCR programs collect, compile, and report UCR data received from local jurisdictions.

The Texas Department of Public Safety (TxDPS) has taken stewardship over statewide crime reporting and is tasked with collecting, validating, and consolidating all UCR data from jurisdictions throughout the State of Texas. TxDPS forwards this UCR data to the FBI and makes crime statistics available to the public.

The San Antonio Police Department's (SAPD) UCR Office began compiling crime data according to NIBRS standards in November 2020. They compile the NIBRS data for submission to TxDPS monthly. Prior to the implementation of NIBRS reporting standards, the UCR Office reported crime data using the Summary Reporting System (SRS). Using SRS, only the most serious offense is reported for each incident. Conversely, NIBRS requires all offenses within an incident to be reported. As reporting crime data in compliance with NIBRS is a new standard for the SAPD, quality controls are still being finalized for crime reporting including staff training, quality assurance reviews (QARs), and performance metrics for the staff review of incident reports.

The primary responsibility of the UCR Office is to provide the Chief of Police, the Command Staff, and all levels of SAPD personnel with Uniform Crime Reporting information and analysis. The UCR Office uses the Mark43 records management system (RMS) to review and compile all crime statistics and offenses included in incident reports. They began using this system November 1, 2020.

Audit Scope and Methodology

The audit scope was from November 2020 through May 2021. We also reviewed the flat file upload of incidents to TxDPS from November 2020 through August 2021.

We interviewed staff and management to gain an understanding of the reporting process under NIBRS. Additionally, we reviewed the process for the creation and review of incident reports in Mark43. We also gained an understanding of the process for managing user access within Mark43. Finally, we reviewed the monthly process for uploading crime data to TxDPS.

We obtained a random sample of 25 Group A and 25 Group B incident reports to determine if the SAPD was accurately recording crime data and reviewing incident reports. Additionally, we obtained a random sample of 25 arrest reports to determine if the SAPD was properly linking them to the original offense in Mark43. We also reviewed the monthly flat file upload of crime data to TxDPS to determine if all completed incident reports were transferred from Mark43. Additionally, we obtained the current listing of Mark43 users to determine if user access was reasonable. Finally, we reviewed the status of SAPD UCR quality controls that were in development for incident report processing.

We assessed internal controls relevant to the audit objective. This included a review of policies and procedures including the FBI NIBRS User Manual, UCR Office Standard Operating Procedures (SOP), incident report approval in Mark43, monthly flat file uploads to TxDPS, and Mark43 user access.

We relied on computer-processed data in the Mark43 system to validate the accuracy of incident reports. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. Our direct testing included reviewing the accuracy of incident reports in Mark43 and tracing the completed incident reports into the monthly flat file upload. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. 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.

Audit Results and Recommendations

The SAPD is accurately recording incident reports and offenses in Mark43. We reviewed a random sample of 25 Group A and 25 Group B incident reports out of a total population of 120,466 covering the period November 2020 through May 2021 and determined SAPD is accurately recording incidents with the required data elements, capturing all offenses from the incident report, and recording the correct NIBRS code for offenses. Additionally, the SAPD is appropriately reviewing and approving incident reports in Mark43.

To achieve NIBRS certification, TxDPS requires law enforcement agencies to upload monthly crime data with an error rate of less than 4%. The SAPD obtained NIBRS certification on January 25th, 2021 by meeting this requirement. Additionally, from November 2020 to August 2021, the SAPD averaged less than a 1% error rate which is well below this requirement.

A. Quality Controls

Certain quality controls relating to the new NIBRS reporting process have not been finalized.

The SAPD began submitting crime data according to NIBRS standards on November 1, 2020. In addition to this reporting change, they also transitioned to the Mark43 RMS to facilitate compliance with NIBRS. As a result of these changes, the SAPD began updating existing quality controls to comply with NIBRS standards and the use of Mark43. These included the following controls:

- Structured Training Program
- Quality Assurance Reviews (QARs)
- Incident Report Review Metrics

While the FBI UCR Program does not require the SAPD to train staff for NIBRS certification, the SAPD has held several trainings for UCR staff covering both the use of Mark43 and NIBRS compliance. The SAPD will continue to review the training program for improvement as NIBRS compliance and Mark43 have now been fully implemented.

QARs are additional reviews performed over more significant and/or error-prone offenses. The FBI UCR Program does not require these reviews and they are an additional quality control implemented by the SAPD. The SAPD performed some QARs from January 2021 through July 2021 covering offenses like aggravated assault, rape, bias crimes, and arson. The SAPD is continuing to assess and revise this process as it identifies offenses that require additional review.

The SAPD is in the process of developing a standard metric for UCR staff specifying the minimum number of incident reports that should be reviewed to

minimize the backlog of incident reports in Mark43. In prior years, the SAPD had established detailed requirements for this standard but is still finalizing the requirement now that they are using Mark43 and reporting crime data according to NIBRS standards.

Finalizing development of these quality controls and documenting them is important to ensure efficient and timely reporting as well as continued compliance with NIBRS standards.

Recommendations

The Chief of Police should continue the development and finalization of quality controls for reporting crime data to facilitate NIBRS standards for the following processes: structured training program, quality assurance reviews (QARs), and incident report review metrics. This should also include documentation of all significant controls.

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Douglas Francis, CIA, Auditor in Charge
Daniel Kuntzelman, CIA, CISA, IT Auditor

Appendix B – Management Response

CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

February 28, 2022

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Corrective Action Plan for Audit of San Antonio Police Department Uniform Crime Reporting

The San Antonio Police Department has reviewed the audit report and has developed the Corrective Action Plan below corresponding to the report recommendation.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
1	**Quality Controls** The Chief of Police should continue the development and finalization of quality controls for reporting crime data to facilitate NIBRS standards for the following processes: structured training program, quality assurance reviews (QARs), and incident report review metrics. This should also include documentation of all significant controls.	3	Accept	Richard Riley, Assistant Police Director	February 28, 2022

Action plan:

1. The SAPD UCR Office finalized the development of a structured training program for new and established employees. New employees receive 80 to 120 hours of NIBRS training from the Police Administration Manager (PAM) or Special Projects Manager (SPM) during orientation. Following initial training, new employees are assigned a mentor/experienced team member to provide on the job training for the NIBRS review process. Normally an employee spends 2-4 weeks under the tutelage of a mentor before being released to work independently. The goal of the training is to ensure the data collected by officers complies with NIBRS reporting standards, the data is uniform, and the error rate remains less than 4% as required by the Texas Department of Public Safety (DPS). After receiving initial training, all employees receive quarterly training to encourage continuous improvement, review, identify and learn to avoid common NIBRS errors, highlight, and discuss NIBRS updates, and maintain a cadre of subject matter expertise within the UCR Office. All training is documented in an employee's file and maintained in the Monthly Self Audit SharePoint folder.

2. The SAPD UCR Office established quarterly Quality Assurance Reviews (QARs). The goal of the QAR is to ensure data submitted to DPS has an error rate of less than 4%. QARs focus on incidents/offenses considered high profile or where subjectivity in determining NIBRS codes exists. As an example of high-profile offenses, all homicide offenses are reviewed and reconciled with the Homicide Unit monthly. QARs are used to ensure NIBRS codes are selected and recorded based on the NIBRS definition of an offense rather than the Texas Penal Code definition of an offense (e.g., differentiating between a simple and aggravated assault based on type of weapon, seriousness of the injury, or the intent and the capability of the assailant to cause serious injury). To ensure NIBRS offense codes are correctly assigned, a random sample of five percent of violent crimes and property crimes are selected for a QAR. Additionally, the SPM reviews the NIBRS report each month before it's submitted to DPS. DPS also conducts QARs on the department's monthly submission to ensure reporting accuracy. QARs are documented and maintained in the UCR SharePoint folder.

3. The SAPD UCR Office established an incident report metric to track UCR employee performance. SAPD UCR employees are required to review 16 NIBRS incident reports per hour. Adjustments to this goal can be made if the employee is reviewing highly complicated offense reports that require additional attention to ensure all data is captured and entered correctly (e.g., incidents where multiple offenses occurred, or with multiple victims). Similarly, when an employee identifies an error in the report and must research the NIBRS manual for the proper coding and communicate with the author of the report to obtain additional information. An adjustment may also be necessary if the employee is required to complete other tasks in support of the NIBRS team (e.g., QARs, DPS or FBI data checks, providing ORR responses, COSA training, etc.). Incident report review metrics are established and presented to individual employees during the annual EPE planning process. Employee metrics are recorded and maintained in UCR SharePoint folder.

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We are committed to addressing the recommendation in the audit report and the plan of action presented above.

Sincerely,

William McManus
Chief of Police, San Antonio Police Department

3/1/2022
Date

Maria Villagomez
Deputy City Manager, City Manager's Office

3/1/2022
Date

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