



CITY OF SAN ANTONIO

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March 22, 2023

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SUBJECT: Audit Report of Park Police Operations

Mayor and Council Members:

We are pleased to send you the final report of the audit of Park Police Operations. This audit began in August 2022 and concluded with an exit meeting with department management in December 2022. Management's verbatim response is included in Appendix B of the report. 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

Park Police Operations

Project No. AU22-036

March 22, 2023

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, specifically Park Police operations. The audit objectives, conclusions, and recommendations follow:

To determine if Park Police operations are managed effectively and efficiently to meet core mission objectives including deployment plans, equipment tracking, and compliance with training requirements.

Overall, Park Police are meeting core mission objectives. Policies and procedures are reviewed and approved. Officers are appropriately patrolling their assigned locations. Police reports are adequately and timely reviewed and follow-up is occurring as necessary. Monthly line inspections are performed by supervisors. Furthermore, internal training requirements are being met to include annual training, special equipment training, and training of instructors.

However, the audit team identified areas in which controls could be improved over deployment of officers, monthly report accuracy, equipment management practices, and user access. Sufficient personnel are not on duty to deliver police services. In addition, monthly reports are not accurate. Improvements can be made to strengthen controls over ammunition and bike parts. Finally, system access is not removed for separated employees in a timely manner.

We provided recommendations to management to strengthen controls and resolve identified issues.

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 8.

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Background

The San Antonio Park Police (Park Police) are responsible for providing law enforcement to the more than 18,000 acres of park lands that make up the over 200 plus City-owned parks as well as other facilities including swimming pools, gymnasiums, cemeteries, sports facilities, recreation centers, municipal golf facilities, and major tourist attractions. Park Police Officers are also responsible for patrolling over forty-one miles of City trails on bicycles and all-terrain vehicles.

For FY 2022, Park Police had 198 authorized positions, of which 193 were sworn peace officers, and 5 were civilians. As of November 2022, 160 sworn peace officers are on staff and the department is understaffed by 33 officers.

To join the Park Police Department, applicants must already be sworn Peace Officers with the Texas Commission on Law Enforcement (TCOLE), the state agency that maintains requirements to perform law enforcement duties in the state of Texas. If accepted, each candidate must attend and successfully complete a 16-week training academy in which they learn a combination of academic and hand-on skills required to operate effectively as a Park Police Officer, as well as on-going training throughout their tenure.

Once officers have successfully completed training, they are assigned to various divisions within the Park Police department to include Riverwalk Patrol, District Patrol, Operations Support, and the Administrative Section, each of which is led by a lieutenant who reports to the Park Police Captain. Each division has several sergeants who supervise the officers under their charge, to include performing inspections of equipment and attire; reviewing and approving reports; managing shifts; and enforcing responsibilities for basic Park Police services.

Park Police Officers have the same jurisdiction and law enforcement authority within the City of San Antonio and the State of Texas as the San Antonio Police Department and report to the Chief of Police. Park Police Officers issue citations, make arrests, and have initial investigative responsibility for criminal offenses that occur in and around the parks, within their areas of responsibility, and for on-sight criminal activity throughout San Antonio. In addition to proactive patrol of the parks and assigned areas, Park Police Officers respond to thousands of calls for service each year. Park Police Officers patrol their assigned areas on foot, in cars, trucks and SUVs, as well as on bicycles, all-terrain vehicles, and patrol boats.

Audit Scope and Methodology

The audit scope was Park Police operations from FY 2021 – FY 2022 and included training requirements, deployment plans, equipment tracking, and IT systems used.

To gain an understanding of Park Police operations, we interviewed Park Police department personnel and conducted walkthroughs of relevant processes. In addition, we reviewed pertinent documentation related to operations such as equipment inventory, system-generated reports, training documentation, and SAP reports. The Park Police General Manual, Standard Operating Procedures, TCOLE training requirements, and City of San Antonio Administrative Directives were our primary criteria for this audit.

We assessed internal controls relevant to the audit objective. This included a review of Park Police General Manual and Standard Operating Procedures (SOP). In addition, as part of our testing procedures we examined the following areas:

- Reviewed daily staffing to determine if sufficient personnel are on duty to provide police services,
- Determined if Park Police is measuring workload performance measures per the SOP and reported numbers are accurate,
- Confirmed if sergeants are monitoring police reports for completion in a timely manner,
- Determined if Park Police complies with state and internal training requirements,
- Confirmed if adequate controls are in place to ensure equipment is available for use,
- Verified if controls over higher risk purchasing processes are adequate, and
- Determined if Park Police is timely requesting system access removal of separated staff and access is appropriate for newly hired staff.

We relied on computer-processed data in the FASTERWeb to trace bike-related inventory from purchase to usage. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. 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

Overall, Park Police operations are effectively managed to meet core mission objectives. We reviewed the General Manual and Standard Operating Procedures to determine if they are reviewed and approved. We found that they were reviewed annually and appropriately approved.

We also determined officers are patrolling their assigned locations and are monitoring police reports for timely completion. We reviewed a sample of 10 officers' patrol activity against their assigned location and found officers are patrolling within their assignments. In addition, we reviewed the Police Report Tracking System (PRTS) and found that sergeants are monitoring police reports for timely completion and appropriate follow-up action is occurring, when necessary. Also, we reviewed line inspection results for 3 months, for 31 officers and determined sergeants are performing monthly line inspections which help ensure that equipment assigned to officers are available and in working condition.

Furthermore, we determined Park Police is adequately meeting internal training requirements. Park Police officers are required, per Standard Operating Procedures, to obtain 40 hours of in-service training annually. We reviewed training records for FY2022 and verified all 143 officers who required in-service training received it. In addition, officers must obtain training to utilize specialized, non-lethal equipment, such as tasers and pepper spray. We confirmed that a sample of 5 officers utilizing specialized equipment received training on the use of that equipment prior to issuance. Finally, we obtained a sample of 5 academy instructors and verified they met the necessary qualifications to train other officers.

A. Operations

A.1 Deployment

Current staffing is not at a level to achieve minimum requirements as outlined in Park Police Standard Operating Procedures. Park Police have established, via Standard Operating Procedures, minimum staffing requirements. These requirements establish the minimum number of officers, sergeants, and lieutenants needed per shift and day as well as the priority order for staffing specific geographic locations.

We obtained a sample of two non-consecutive weeks to determine if Park Police met the minimum staffing requirements and the staffing priorities for those periods. In total, for the 238 shifts reviewed, 81, or 34% did not meet minimum staffing requirements, and 56 shifts did not fill priority locations for officers.

Park Police leadership are aware they are not meeting minimum staffing objectives which is attributed to being understaffed. Due to a variety of factors both internal and external, Park Police is currently unable to maintain adequate staffing to meet minimum patrol objectives. Factors include the overall hiring difficulties across the city, the political environment surrounding policing, leaves of absence, and departmental structure. At the time of testing, Park Police were understaffed by 33 positions, or 17% of authorized positions. In addition, 3 officers are on a leave of absence.

To mitigate staffing issues, as well as address increasing activity in and around parks, Park Police developed a staffing adjustment proposal to help meet department objectives. We performed an analysis of the proposed plan to determine if officer availability still improved with the current number of vacancies and confirmed it would aid in mitigating the risks associated with the current vacancies by overall increasing the number of officers available for patrol on most days.

Per Park Police Patrol SOP 110 Staffing Requirements, minimum staffing requirements and staffing priorities ensure that command, supervisory, and line personnel are on duty in sufficient numbers to properly deliver police services as needed.

A.2 Monthly Report Accuracy

While Park Police is measuring workload performance measures per their SOP, the reported numbers are not accurate. Workload performance measures include activities such as arrests, warrants, calls responded to, and public safety presentations performed. We obtained individual monthly reports for a sample of officers for August 2022 and recalculated the consolidated monthly report to determine if it was accurate. In total, 19 of the 72 workload performance measures, or 26%, were not accurate.

Per SOP Procedure 117 Monthly Reports, the performance measures help in determining levels of officers, shift, and unit efficiency within the Patrol section.

Individual monthly reports are consolidated into a single monthly report manually and controls are not adequate to ensure the reports are consolidated accurately. Inaccurate monthly reports can impede Park Police leadership from making effective decisions in support of the Patrol Section.

Recommendations

A. The Chief of Police

A.1 Continue to pursue the staffing adjustment proposal to increase officer availability and address current patrol needs and review the minimum staffing and priority requirements to ensure requirements are still in line with current needs.

A.2 Implement controls to ensure reported numbers are compiled accurately and review and correct past reported data.

B. Equipment

B.1 Ammunition

Park Police do not have adequate controls over ammunition. Ammunition is stored at the training academy and utilized for training purposes. However, at the time of the audit, inventory procedures for ammunition were not adequate. Ammunition was not signed out by staff and inventory counts could not be reconciled to an inventory listing. In addition, ammunition is taken by a single instructor from the Park Police Training Academy to the San Antonio Police Department (SAPD) shooting range for training.

Per the General Manual Procedure 307 Weapons, ammunition removed from or returned to the training academy vault should be signed in and out on a provided form. However, the training academy had not implemented this practice.

During the audit, Park Police did implement an Ammunition Control Log which requires signing in and out ammunition, with another instructor as a witness and supervisor sign off at the end of the day. We believe this is sufficient to address inventory accountability, but there is still a risk of misappropriation of ammunition via current transport practices.

Inadequate controls over ammunition could result in loss or theft of ammunition, putting public safety at risk.

B.2 Bike Parts

Park Police do not have adequate segregation of duties over management of bike parts. The Bike Inventory Management Officer (BIMO), as the role is currently designed, is responsible for ordering, receiving, inputting parts into FASTERWeb, storing the physical parts, performing an inventory, and issuing parts to work orders.

We obtained a sample of 7 purchases and traced them from purchase to present day in the bike parts inventory and did not identify any issues. However, adequate segregation of duties is vital in mitigating the risk of theft.

Administrative Directive 8.7 Financial Management of Capital Assets and Tracked Property requires management of property to include adequate segregation of duties and safeguarding of assets. However, the BIMO role was designed with excessive responsibilities over parts. While no potential fraud was identified, without adequate segregation of duties, Park Police creates the opportunity for misappropriation of assets.

Recommendations

B. The Chief of Police

B.1 Maintain Park Police ammunition supply at the SAPD firing range. In addition, update general manual procedures to reflect all adjusted practices.

B.2 Evaluate the bike parts management processes to determine where duties can be segregated so that parts ordering, inventory, and assignment are not managed by a single individual.

C. User Access

Park Police is not requesting access removal for separated staff in a timely manner. We obtained the population of separated employees for FY2022. Of the 17 employees identified, 4 deprovisioning requests were submitted more than 24-hours after their last day of work. Access removal requests ranged from 3 days after end of employment to 20 days after end of employment.

Per Administrative Directive 7.8D Access Control, access to COSA IT assets must be disabled upon separation of the employee.

Park Police is not requesting deprovisioning of user accounts consistently as part of regular off boarding of staff. Without timely access removal, separated employees may access sensitive information without authorization.

Recommendations

The Chief of Police, potentially through an off-boarding checklist, implement controls to ensure that deprovisioning requests are sent to ITSD on the last day of employment.

Appendix A – Staff Acknowledgement

Abigail Estevez, CPA, CIA, CISA, Audit Manager
Nastasha Leach, CIA, CRMA, CGAP, IT Auditor in Charge
Loretta Faxlanger, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

March 10, 2023

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

RE: Management's Corrective Action Plan for Audit of Parks Police Operations

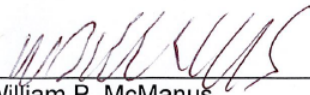
The San Antonio Police Department has reviewed the audit report and has developed the Corrective Action Plan below corresponding to the report recommendation.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A.1	Deployment The Chief of Police continue to pursue the staffing adjustment proposal to increase officer availability and address current patrol needs and review the minimum staffing and priority requirements to ensure requirements are still in line with current needs.	5	Accept	Deputy Chief Chris Benavides	April 2023
Action plan: The Park Police have identified a new staffing plan to increase patrol availability and efficiency. The staffing plan increases staffing efficiency by adjusting various shifts within the Park Police from four ten-hour shifts to five eight-hour shifts within the work week. This change allows for the Park Police to create a third shift during the overnight hours while maintaining minimum staffing levels on the existing morning and afternoon shifts. This change increases patrol availability within the Park Police.					
A.2	Monthly Report Accuracy The Chief of Police should implement controls to ensure reported numbers are accurate and review and correct past reported data.	5	Accept	Deputy Chief Chris Benavides	July 2023

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	Action plan: The Park Police are working with the SAPD Technology Team and ITSD to develop an electronic system that compiles and tracks personnel performance data. This new automated system will remove current manual entry by supervisors and reduce human error, increasing the accuracy of the data. Once developed, the department will revise the applicable departmental procedures.				
B.1	Ammunition The Chief of Police maintain Parks Police ammunition supply at the SAPD firing range. In addition, update general manual procedures to reflect all adjusted practices.	6	Accept	Deputy Chief Chris Benavides	March 2023
	Action plan: The Park Police ammunition will be moved, stored and inventoried at the SAPD armory. The Park Police implemented a control log to document and reconcile any ammunition removed, transported or returned to the Park Police ammunition inventory. The department has revised the applicable departmental procedures.				
B.2	Bike Parts The Chief of Police evaluate the bike parts management processes to determine where duties can be segregated so that parts ordering, inventory, and assignment are not managed by a single individual.	6	Accept	Deputy Chief Chris Benavides	February 2023
	Action plan: The Park Police implemented increased segregation of duties for bike part management. The role is now divided between two different officers and is under the supervision of a Patrol Sergeant. One officer has responsibility over ordering and purchasing and another officer has responsibility over inventory and distribution. The Park Police SOP has been updated to include the new segregation of duties.				
C	User Access The Chief of Police potentially through an off-boarding checklist, implement controls to ensure that deprovisioning requests are sent to ITSD on the last day of employment.	6	Accept	Deputy Chief Chris Benavides	February 2023
	Action plan: The Park Police implemented an off-boarding process for every officer separating from the department. On the separating members last day of employment, a request will be made to ITSD requesting deprovisioning of the members access. The department is revising applicable departmental procedures.				

Audit of San Antonio Police Department
Parks Police Operations

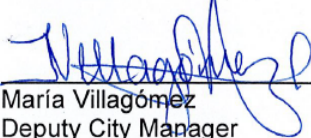
Sincerely,



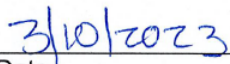
William P. McManus
Police Chief
San Antonio Police Department



Date



María Villagómez
Deputy City Manager
City Manager's Office



Date