



CITY OF SAN ANTONIO

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February 6, 2018

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SUBJECT: Follow-up Audit Report of Center City Development & Operations Parking Enforcement Division

Mayor and Council Members:

We are pleased to send you the final report of the Follow-up Audit of Center City Development & Operations Parking Enforcement Division. Center City Development & Operations management submitted a separate memo which follows this cover memo discussing their action plans in addition to their management response in Appendix B of the report. The Center City Development & Operations Office 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



Follow-Up Audit of Center City Development & Operations
Parking Enforcement Division

Project No. AU17-F07

February 6, 2018

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

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted a follow-up audit of the recommendations made in the Center City Development & Operations Parking Enforcement Division dated March 07, 2016. The objective for this follow-up audit is:

Determine if recommendations made in the prior audit of the CCDO Parking Enforcement have been effectively implemented.

CCDO Parking Enforcement (Parking) has made progress implementing action plans from the prior audit recommendations. However, we identified action plans that have not been fully implemented.

There were seven recommendations made in the prior audit. Five action plans have been fully implemented. Parking implemented controls to address violators with multiple unresolved parking citations. Parking made enhancements to improve parking enforcement officer's safety. In addition, Parking implemented controls to ensure compliance with State requirements for confiscated handicap placards. Finally, internal controls were implemented to ensure the complete transfer of parking citations data from the Brazos to the Municipal Court's Incode system.

However, the following areas have not been fully implemented. Parking has inadequate controls to ensure the proper use of parking enforcement vehicles. In addition, Parking has ineffective monitoring controls to ensure minimum evidence requirements are included in parking citations.

Recommendation Status Summary

Recommendation Status	Number of Recommendations
Implemented	5
Partially Implemented	2
Not Implemented	0
Total Recommendations Reviewed	7

Center City Development & Operations Management agreed with the audit findings and recommendations 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

In March of 2016, the Office of the City Auditor completed an audit of CCDO Parking Enforcement Division. The objective of the audit was as follows:

Are parking enforcement operations managed in accordance with City ordinance and policies.

The Office of the City Auditor concluded that CCDO Parking Enforcement Division is effectively enforcing the City's Municipal Code regarding parking violations. However, the following control deficiencies were identified in the prior audit.

- Parking violators with multiple citations are not being addressed.
- Officer's safety environment improvements were identified.
- Reconciliation between parking citation issued and the Municipal Court's Incode system are not being performed.
- Evidence supporting reasons for citations is inconsistent.
- Handicap parking enforcement is not in compliance with State Code.
- Controls to ensure the proper use of City vehicles are ineffective.
- Logical system access to citation writers is insufficient.

Center City Development & Operations management agreed with the conclusions and developed action plans to address the audit recommendations.

Audit Scope and Methodology

The audit scope was limited to the recommendations and corrective action plans made in the original report for the time frame from FY 2016 through June 2017.

We interviewed Parking and Municipal Court management and staff to gain an understanding of the reconciliation process for issued parking citations. We reviewed issued parking citations to determine if citations issued on the eCitation handheld devices completely transferred to Brazos and Municipal Court's Incode systems.

We tested 25 confiscated handicap placards for compliance with state requirements. We verified Parking made enhancements to improve officer safety. We also verified that the alert notification within the eCitation handheld devices is working as intended. We tested Parking's logical access controls for the Brazos system and eCitation handheld devices for compliance with City Administrative Directive 7.4.

We tested 25 issued citations to determine if all citations contained minimum evidence requirements. In addition, we reviewed support documentation to determine if a review for citation accuracy and completeness had occurred. We reviewed Parking's current procedures for the review of vehicle usage to determine if controls are adequate to ensure the proper use of enforcement vehicles.

We relied on computer-processed data in the Brazos and Municipal Court's Incode System to validate citation data uploaded and transferred completely to each of the systems. We performed a reconciliation of eCitation handheld reports along with the Brazos and Municipal Court's Incode data to determine if the internal application controls were working as intended. Our direct testing included tracing the citation data from Brazos to the Municipal Court's Incode system. We do not believe that the absence of testing all 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.

Prior Audit Recommendations and Status

A. Multiple Citations

Prior Recommendation:

Municipal Court Clerk should ensure the alert function within the application software for vehicles with multiple unresolved parking citations is corrected and functioning as intended.

Status: Implemented

Parking in collaboration with Municipal Court corrected the alert notification in the eCitation handheld devices for violators with multiple unresolved citations. We tested the application within the handheld devices and determined that the alert function is working as intended and officers received notification of vehicles that were subject to additional parking enforcement measures.

Recommendation

None

B. Officer Safety

Prior Recommendation:

The Director of CCDO implements an incident reporting process and performs a risk management study on the safety environment of officer and update safety policies and procedures.

Status: Implemented

Parking has made enhancements to improve officer safety. Parking Enforcement officers received smartphone devices capable of submitting incident report forms for issues concerning officer safety. Parking tracks all submitted incidents and then distributes them to all parking enforcement officers. In addition, strobe lights were installed on all enforcement vehicles and all officers attended situational awareness training conducted by SAPD.

Recommendation

None

C. Handicap Parking

Prior Recommendation:

The Director of CCDO creates and implements procedures and controls to ensure compliance with State Code over handling of confiscated handicap placards.

Status: Implemented

Parking created and implemented procedures and controls to ensure confiscated handicap placards adhere to state requirements. We tested 25 confiscated placards and determined that Parking notified and destroyed confiscated placards in compliance with State Code.

Recommendation

None

D. Lack of Reconciliations

Prior Recommendation:

The Director of CCDO and Municipal Court Clerk establish and implement formal procedures to ensure electronic and paper citation are accurately and timely transferred to the Incode System. This includes performing reconciliations for both electronic and paper citations.

Status: Implemented

Parking Enforcement officers now issue electronic citations only and rely on the application controls within the Brazos and Municipal Court's Incode system to ensure the accuracy and complete transfer of citation data. We performed a reconciliation of eCitation handheld reports to the Brazos and Municipal Court's Incode system for a one week period and determined that all citation data reconciled completely and the systems application controls are working as intended.

Recommendation

None

E. Use of City Vehicles

Prior Recommendation:

The Director of CCDO ensures established policies and procedures are executed as intended for the proper use of City Vehicles.

Status: Partially Implemented

Parking established a process for the review of City vehicle usage. However, we identified inconsistencies in the execution and documentation of vehicle reviews.

According to the Parking Superintendent, all vehicles are reviewed for proper usage every month and documented on a Parking Enforcement Unit Audit Report. However, we identified 7 of 14 vehicles were not reviewed in September 2016.

The Parking Manager provided different review documentation performed for the months of October and November of 2016. A Parking Enforcement Operations COSA Vehicles Monthly Audit was performed, which includes a review of time of vehicle usage and mileage information. Nine of 14 vehicles were not reviewed in October 2016 and 9 of 14 vehicles were not reviewed in November 2016. We could not determine effective implementation of monitoring efforts for the proper use of vehicles due to the lack of documentation and inconsistency in review methods.

Current policies and procedures for vehicle usage are incomplete and lack clear guidance for the performance of vehicle reviews. In addition, a lack of management oversight has contributed to the inconsistent execution of vehicle reviews and insufficient support documentation. Ineffective controls to ensure proper use of city vehicles can lead to misuse of City assets and increased liability.

Recommendation

The Director of CCDO revise current policies and procedures to include guidance for the performance of vehicle reviews. In addition, establish and implement adequate monitoring controls to ensure the proper use of City vehicles.

F. Inconsistent Evidence and Support

Prior Recommendation:

The Director of CCDO establish a minimum requirement for evidence gathering and document retention for parking citation categories including follow-up processes to determine effectiveness. In addition, ensure officers are properly trained on requirements.

Status: Partially Implemented

Parking established policies and procedures for minimum citation requirements for evidence gathering and document retention. However, Parking was unable to provide evidence of reviews for citation accuracy performed from October 2016 through April 2017.

Parking lacks management oversight to ensure current policies and procedures for minimum citation requirements are executed and reviews for citation accuracy are performed. Lack of consistent evidence and support of parking citations may increase the likelihood of citation dismissals.

Recommendation

The CCDO Director ensure established policies and procedures for the minimum citation requirements are executed and working as intended. Additionally, perform periodic reviews to ensure citation accuracy and retain relevant support documentation.

G. Logical Access Controls

Prior Recommendation:

The Director of CCDO implements policies and procedures to improve logical access controls of citations writers.

Status: Implemented

Parking has established compensating controls at an acceptable level which address logical access related to the citations writers. In addition, Parking obtained approval of risk acceptance by ITSD.

Recommendation

None

Appendix A – Staff Acknowledgement

Buddy Vargas, CIA, CFE, Audit Manager
Lawrence Garza, CFE, Auditor in Charge
Nastasha Leach, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

January 29, 2018

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

RE: Management's Acknowledgment and Corrective Action Plan for the Follow-up Audit of Center City Development & Operations (CCDO), Parking Enforcement Division.

- Fully Agree (provide detailed comments)
- Agree Except For (provide detailed comments)
- Do Not Agree (provide detailed comments)

Center City Development & Operations has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
E	<p>Use of City Vehicles</p> <p>The Director of CCDO revise current policies and procedures to include guidance for the performance of vehicle reviews. In addition, establish and implement adequate monitoring controls to ensure the proper use of City vehicles.</p>	4	Accept	John Jacks, Director	Completed
	<p>Action plan: CCDO has updated the policies and procedures for proper use of City vehicles to include implementing new vehicle log procedures. Staff has been properly trained on the new policy and monthly vehicle log audits will be conducted. The Parking Division created a Quality Control Committee, to include Director of CCDO, to verify policies and procedures are being followed.</p>				

Follow-Up Audit of CCDO Parking Enforcement

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
F	<p>Inconsistent Evidence and Support</p> <p>The CCDO Director ensure established policies and procedures for the minimum citation requirements are executed and working as intended. Additionally, perform periodic reviews to ensure citation accuracy and retain relevant support documentation.</p>	5	Accept	John Jacks, Director	Completed
<p>Action plan: CCDO has updated the policies and procedures for citation evidence and support and parking enforcement officers have been properly trained on the new procedures. Citation audits were periodically conducted, however, the process was not consistent. The Parking Divisions' Quality Control Committee will verify policies and procedures are being followed and citation audits are being conducted on a regular basis.</p>					

We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,



 John Jacks, Director
 Center City Development & Operations Department

1-29-18

 Date




 Lori Houston, Assistant City Manager
 City Manager's Office

1-29-18

 Date

**CITY OF SAN ANTONIO
CENTER CITY DEVELOPMENT & OPERATIONS
INTERDEPARTMENTAL CORRESPONDENCE SHEET**

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

FROM: John Jacks, Director, Center City Development & Operations 

SUBJECT: Management Response to CCDO Parking Enforcement Follow-Up Audit

DATE: January 29, 2018

CCDO has reviewed the CCDO Parking Enforcement Follow-Up Audit report and developed Corrective Action Plans to address the report recommendations. The Parking Division has made significant efforts to ensure Center City Development & Operations (CCDO) Parking Enforcement is implementing effective policies and procedures that ensure compliance with city parking ordinances. CCDO staff has made improvements to departmental policies and procedures, enhanced enforcement officer safety, and implemented controls to ensure compliance with state requirements for handicap placards. In addition, CCDO worked with ITSD to address internal controls related to the security of electronic data. With these changes, we are pleased to report that the identified issues and recommendations have been addressed.

Of the seven findings in the 2016 audit, five were implemented and two were partially implemented. The partially implemented findings have to do with auditing vehicle usage and evidence documentation for the issuance of citations. CCDO Parking Division has policies for both of these findings. Per the policies, staff was to perform monthly audits of the vehicle log reports as well as the collection of evidence for citations. These audits were not performed consistently. CCDO has updated both policies and created a Quality Control Committee that will verify that the audits are being conducted monthly.

We appreciate the assistance of the audit team throughout the audit follow-up period and recognition of the improvements made within the Enforcement Division.