

Approved 2022 Police Internal Audit Plan



APPROVED 2022 POLICE AUDITOR ENGAGEMENTS

Due to events both in the community and across the nation, in 2020, the City Manager proposed, and City Council approved, establishing an auditor position within Internal Audit dedicated to police-related engagements. The Police Auditor works directly with the City Manager and reports administratively to the Internal Audit Manager (Chief Audit Executive, CAE.) In addition, the Internal Audit Manager is responsible for reviewing their work papers and draft reports to ensure compliance with internal audit standards.

The Police Auditor engagements focus on policies and practices in police operations that more directly affect the community, potentially high liability activities, and areas of significant public concern. The engagements aim to increase department transparency and regain and maintain public trust. Engagements may include, where applicable, business process redesign, and they may also touch on performance management where appropriate.

Reports generated by the Police Auditor are included in the quarterly progress reports to the Management and Finance Committee (Audit committee) and presented verbally to the Public Safety, Courts, and Civil Service Policy Committee. In addition, Internal Audit publishes all final reports to the City's website.¹

¹ https://www.auroragov.org/city_hall/departments/city_manager/internal_audit_department

Plan Development Process

The City of Aurora Office of the Internal Auditor applies Institute of Internal Auditors (IIA)² standards (Standards) in developing its audit program. The Standards require that an entity develop its annual audit plan using a risk-based approach. The city-wide audit plan includes details on the audit standards and Internal Audits processes.

Management is responsible for identifying and managing the risks facing the City. Internal Audit provides an independent review of the policies, processes, and controls to manage and mitigate risk to acceptable levels.

RISK ASSESSMENT SURVEY

The Police Auditor utilized risk assessment surveys (independent of the city-wide risk assessment survey). We used the city-wide survey as a template and included questions relevant to police operations. All police employees—civilians and sworn—received a survey. Staff, Supervisors, and Command staff all received different surveys with questions tailored to their roles. The Police Auditor sent surveys anonymously to solicit honest feedback and increase participation; however, this resulted in the inability to follow up with individuals directly. The surveys were issued June 25th and closed July 23rd. The table below shows the percentage of surveys partially and fully completed across each group.

Survey Group	Total surveys sent	Partially Completed	Survey Completed
Command	13	92%	69%
Supervisors	155	41%	32%
Staff	713	31%	23%
Total	881	34%	25%

The risk assessment included questions covering:

- General operating practices, to evaluate current operational efficiencies and effectiveness,
- Training, including questions related to the use of force,
- “Tone at the top,” to assess management’s ethical stance and department morale at the time of the survey,
- Diversity, equity, and inclusion (DEI),
- Safety,
- IT support and technology use,
- Fraud risk, and,
- Top business priorities and risks.

² The IIA is the internal audit profession's global voice, recognized authority, acknowledged leader, chief advocate, and principal educator.

We appreciate the candidness and honesty of everyone who completed the survey.

2022 RISK ASSESSMENT OBSERVATIONS

Our observations identified several areas that we believe management should address and monitor. In addition, the 21CP report ³and the Attorney General's ⁴report also included similar areas of concern.

Training

Respondents identified the need for more training on new legislation, legal updates, and policies. Overall, most respondents felt they were "somewhat" adequately trained for their jobs. Respondents also suggested expanding the training methods to include more than just emails, such as training guides and in-person training.

The Academy is working on in-person training for 2022 and a plan to allow overlap to allow training without impacting staffing. The Academy is also increasing scenario based training, including training with Aurora Fire Rescue Department.

Use of Force

Supervisors and staff respondents disagreed that the current use of force training was sufficient. In addition, there is a gap between the command level, supervisors, and staff, on whether the rules governing the use of force are too restrictive or about right. More than half of Supervisors and 40% of staff do not view the use of force guidelines as useful.

Respondent comments included:

- hesitation for using force out of fear of being charged criminally, fired, or suspended,
- vague guidance related to the use of force,
- concern on whether using force would be within guidelines and whether the Department would support them,
- a lack of training on actual situational topics,
- a need for more and better training, and
- training for the public on what use of force is.

The Police Department and City Management recognized the need for changes related to Use of Force. As a result, the Department awarded a contract to Crime and Justice Institute to draft new use of force policies for the department in July 2021. We will continue to monitor the progress and updates to the current policies and processes.

³ The City engaged 21CP Solutions to assess APD policies, procedures, and operations and to provide recommendations for enhancing the Department's efforts at providing safe, just, effective, and equitable public safety to the Aurora Community. This report is located on the A New Way webpage.

⁴ The Colorado Attorney General conducted a patterns and practice investigation into the Aurora Police Department. This report is available on the Attorney General's website.

Staffing

To learn more about potential reasons for staff departures, we asked supervisors and command to select all the potential reasons for turnover of which they might be aware. Below are the top reasons cited for the 68 who responded.

Reason	%
Lack of support from City Management	88%
Lack of support from elected officials	87%
Lack of support from APD Management	81%
Burnout	74%
Overall Leadership	74%
Resignations	74%
Working conditions	74%

Adequate staffing continues to be a concern across the department. We will continue to monitor turnover rates and redeployment of staff.

Disciplinary Process

Nearly two-thirds of supervisors and staff do not believe the disciplinary process is fair.

Comments suggested that:

- there is no credibility in the internal affairs process from the officers’ points of view,
- officers are held to different standards,
- discipline depends on who you are, and
- there is too much power in Internal Affairs and not enough with line-level supervisors.

When asked if individuals acting in an unsafe manner were held accountable, 67% of supervisors and 59% of staff agreed. When asked if the department helps with coaching and counseling for minor mistakes rather than punishment, 64% of supervisors and 63% of staff disagreed. Respondents also suggested that accountability is increasing, but there could be more transparency. They also are seeing a greater emphasis on coaching and providing meaningful feedback.

The disciplinary process is an area that would benefit from a comprehensive review. This is an area the Chief’s office and City management acknowledged as needing to be addressed; we will continue to monitor their efforts to address this process.

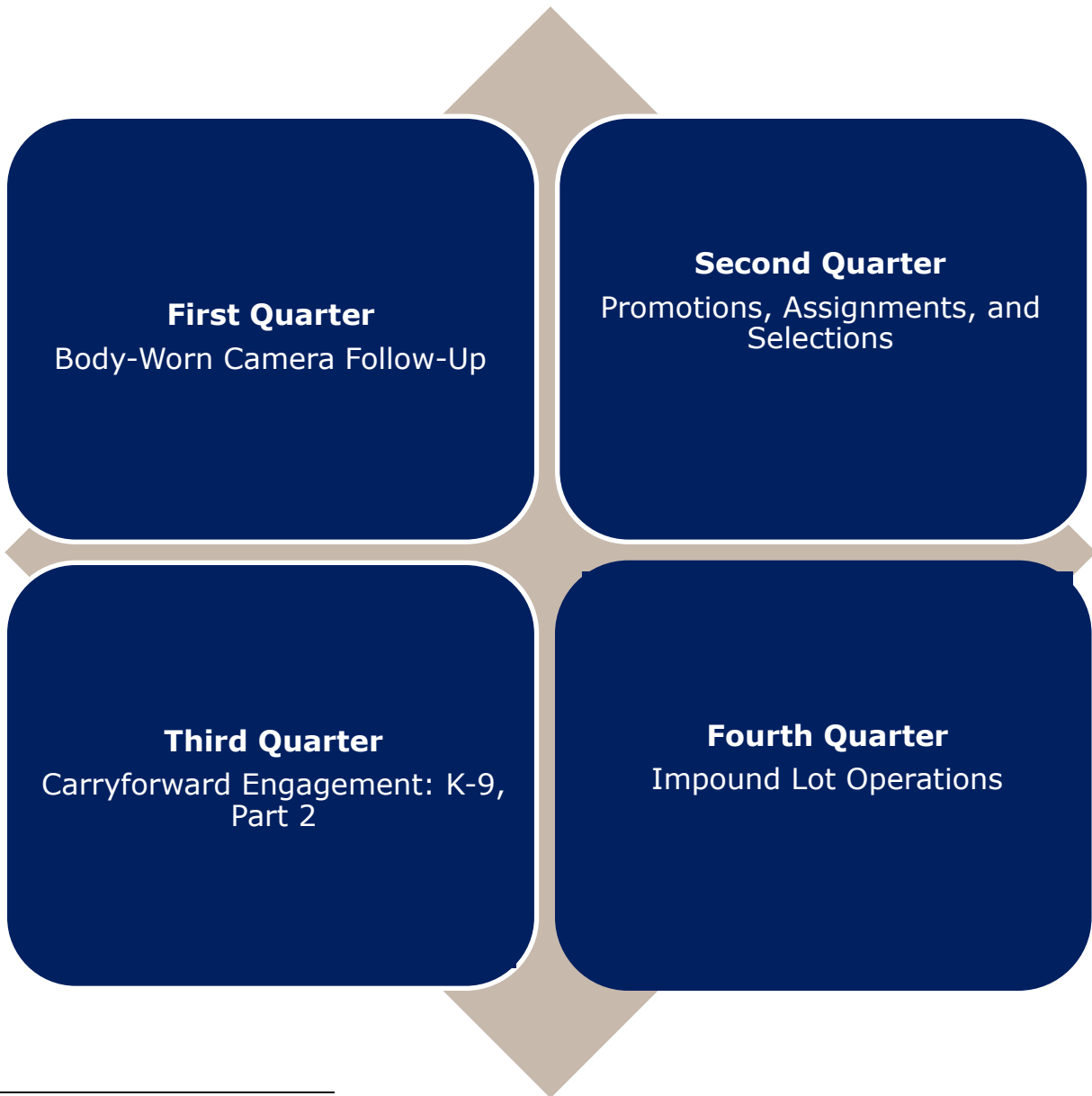
Record’s Unit Operations

Throughout the survey, we read comments referencing concerns with the Records Unit operations. As a result, the Police Auditor recommended issuing a culture survey for the Records Unit in 2021 to identify and understand the issues. The Auditor administered the survey on October 1, 2021; the survey work is ongoing at this time.

Additionally, the City Manager requested in June 2021 that the City Innovation Design Team (IDT) review processes within the Records Unit. The Police Auditor serves on this team and is assisting with these efforts. The IDT is working with the Records Unit on identifying and prioritizing areas for the team to review.

2022 APPROVED POLICE AUDITOR ENGAGEMENTS BY QUARTER

The Police Auditor developed this audit plan from the results of the annual risk assessment and meetings with City Management and the Police Chief and Deputy Police Chief. The City Manager approved the Police Auditor Plan on Thursday, October 14, 2021. The Police Auditor prioritized engagements after soliciting feedback from the Key Community Response Team (KCRT⁵.) The Police Auditor presented this plan to the Management and Finance Committee for affirmation⁶ and will present this to the Public Safety, Courts, and Civil Service Policy Committee as an information item.



⁵ An organization composed of community leaders and activists who meet monthly to share information and address matters of concern involving the city's public safety departments.

⁶ The plan was affirmed by the M&F Committee on November 23rd, 2021. The plan was updated December 1st, 2021 to reflect engagement prioritization.

Quarter 1

Body-Worn Cameras Follow- Up

Operational and
Compliance Review

In 2020, Internal Audit completed an engagement of Body-Worn Cameras (BWC.) In 2021, Aurora Police implemented a new BWC system and policies. This review will follow-up on any outstanding recommendations and determine compliance with internal policies and state laws.

Objectives:

- ❖ Determine if Aurora Police is complying with policies and regulations regarding body-worn camera use.
- ❖ Determine the extent to which the Aurora Police is utilizing the body-worn camera system.

Quarter 2

Promotions, Selections, and Assignments

Process Review

The promotional process is managed by the Civil Service Commission for all ranks, except for the ranks of Commander, Division Chief, and Deputy Chief. These ranks serve at the Chief's discretion. The Chief also selects officers to serve on special assignments such as gangs, K9, and Police Area Representatives (PAR). In addition, there are specific assignments, like Internal Affairs or Field Training Officers (FTO's), that the chief appoints.

Objectives:

- ❖ Review the processes for promotions, selections, and assignments for effectiveness, efficiency, and equity.
- ❖ Determine if the promotions, selections, and assignments processes follow leading practices.

Quarter 3

<p>Carryforward Engagement K-9 Unit Review (Part 2) Operational and Compliance Review</p>	<p>The Aurora Police Department K-9 Unit consists of six canines, their handlers, and a sergeant. The canines perform a variety of tasks, including searching buildings for suspects, narcotics, and explosives. While the presence of police canines may prevent potential violence and injury to officers and suspects, K-9 Unit deployment must follow policies, procedures, and best practices to ensure the safety of all parties. In Part 1, the Police Auditor reviewed the policies and processes and made recommendations.</p> <p>Part 2 will assess how canines are deployed, supervised, and trained under current policies and operations as well as how the new K9 software system functions.</p> <p>Objectives:</p> <ul style="list-style-type: none"> ❖ Assess past deployments for compliance with Unit policies and procedures. ❖ Assess whether the new K9 software system is operating efficiently and effectively. ❖ Determine if the K9 Unit follows leading practices in training, deployment, and reporting.
--	--

Quarter 4

<p>Impound Lot Operations Program Review</p>	<p>The Aurora Police Department Vehicle Impound Detail is responsible for storing all vehicles seized by Aurora Police Officers. The Police Department may impound vehicles for various reasons, including abandoned vehicles, vehicles that contain or are evidence, and statutory reasons such as a non-drivable car after an accident, illegal license plates, or the driver's arrest. The City has an agreement with a third-party impound services contractor for a vehicle storage lot including processing, storage release, and auction services. This agreement is ending in 2022 and will rebid.</p> <p>Objectives:</p> <ul style="list-style-type: none"> ❖ Assess the efficiency and effectiveness of impound operations. ❖ Review the effectiveness of controls over inventory and revenue collections. ❖ Review operations for areas to improve customer service.
---	--

Possible Additional Projects

Assist in the creation of the Independent Monitors Office, including identifying areas for collaboration.

INTERNAL AUDIT TEAM

Wayne Sommer | Internal Audit Manager (CAE)

Wayne is a Certified Public Accountant (CPA) and a Chartered Global Management Accountant (CGMA) with 41 years of diverse work experience. He began his career as an auditor for KPMG in Washington, DC (then known as Peat Marwick Mitchell and Co), advancing to the Audit Senior level (In-charge) with specialization in not-for-profit entities and financial institutions. He spent the next seven years in various financial and management capacities at Trustbank Savings, FSB in Virginia (also known as Dominion Federal Savings and Loan.) Before coming to the City of Aurora, Wayne spent 23 years at the International City/County Management Association (ICMA) in Washington, DC with 14 of those as Director, Administration and Finance, and the last nine working in executive management roles performing strategic planning, business development, and organizational change and development including managing ICMA's U.S. Programs, which offered research and consulting products and services to local governments, the private sector, and the Federal government. Wayne has been with the City of Aurora since May 2014.

Professional Associations: American Institute of Certified Public Accountants; Institute for Internal Auditors; Association of Local Government Auditors

Michelle Crawford | Police Auditor

Michelle is a Certified Internal Auditor (CIA), a Certified Fraud Examiner (CFE), Certified in Risk Management Assurance (CRMA), and has 14 years of experience in governmental auditing. She received her Bachelor's in business administration at the University of Montana and her Master's in accountancy from Missouri State University. Upon graduation from Missouri State University, she started her career at the Missouri State Auditor's office as a Staff Auditor I and progressed over the next seven years to a Senior Auditor. As an auditor with the State Auditor's office, she conducted performance audits of local governments and worked on the statewide Single Audit. Michelle has been with the City of Aurora since October 2014 and in the Police Auditor role since December 2021.

Professional Associations: Association of Certified Fraud Examiners; Institute for Internal Auditors; Association of Local Government Auditors; National Association for Civilian Oversight of Law Enforcement