

Memorandum



DATE: March 25, 2024

TO: Honorable Members of the Government Performance & Financial Management Committee: Chad West (Chair), Paula Blackmon (Vice Chair), Cara Mendelsohn, Jesse Moreno, Jaime Resendez

SUBJECT: Internal Audit Reports Released Between February 17, 2024, and March 15, 2024

Attached for your review are the three Office of the City Auditor audit reports released between February 17, 2024, and March 15, 2024. The full reports are included in [Attachment 1](#).

If you have any questions, please contact me at (214) 670-3222 or mark.swann@dallas.gov.

Sincerely,



Mark S. Swann
City Auditor

Attachment

C: T.C. Broadnax, City Manager
Tammy Palomino, City Attorney
Biliera Johnson, City Secretary
Preston Robinson, Administrative Judge
Kimberly Bizer Tolbert, Deputy City Manager
Jon Fortune, Deputy City Manager
Majed A. Al-Ghafry, Assistant City Manager
M. Elizabeth (Liz) Cedillo-Pereira, Assistant City Manager
Carl Simpson, Assistant City Manager
Jack Ireland, Chief Financial Officer
Genesis Gavino, Chief of Staff to the City Manager
Sheri Kowalski, City Controller
Directors and Assistant Directors
Jeffrey Brill, Manager – Financial Compliance, Auditing & Monitoring



Reports Released:

1. Audit of Small Business Center – Minority and Women-Owned Business Enterprises (February 21, 2023).....Page 2
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Audit of Small Business Center – Minority and Women-Owned Business Enterprises

February 21, 2024

Mark S. Swann, City Auditor

Mayor

Eric L. Johnson

Mayor Pro Tem

Tennell Atkins

Deputy Mayor Pro Tem

Carolyn King Arnold

Council Members

Adam Bazaldua

Paula Blackmon

Zarin D. Gracey

Cara Mendelsohn

Jesse Moreno

Omar Narvaez

Jaime Resendez

Paul E. Ridley

Jaynie Schultz

Kathy Stewart

Chad West

Gay Donnell Willis

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Executive Summary

Objective and Scope

The objectives of this audit were to determine whether:

- Policies and procedures exist to ensure consistent administration.
- Payments to first tier subcontractors post council award are monitored.
- Performance measures for local Minority and Women-Owned Business Enterprise spending are accurately reflected.
- Utilization goals and good faith efforts are accurately reported to the City Council.

The scope of the audit was from October 1, 2020, through September 30, 2022.

Recommendations

The program's effectiveness can be enhanced by:

- Developing a process to monitor subcontractors' payments post council award.
- Identifying the appropriate source data to use for performance measure reporting.
- Updating procedures to mirror *Business Inclusion and Development Policy* requirements.

Background

The *Business Inclusion and Development Policy* of 2020 applies to all contracts for the purchases of goods or services over \$50,000, with a special emphasis for first tier subcontracting opportunities. Among several responsibilities and provisions identified in the *Business Inclusion and Development Policy*, the following were pertinent to the audit objective:

- Tracking and monitoring payments to first tier subcontractors post council award.
- Maintaining and submitting accurate and current reports on performance measures.
- Documenting good faith efforts.

The Small Business Center budget was approximately \$2.4 million for Fiscal Year 2021-2022 and a performance measure of 65% for *Certified Minority and Women-Owned Business Enterprise Spend with Vendors Located in Dallas* was established.

Observed Conditions

The utilization goals and good faith efforts for first tier subcontracting opportunities reported to City Council during procurements are generally accurate. However,

- Monitoring of subcontractor payments after council award is informal and inconsistent.
- Progress reported on performance measures is inaccurate.
- Administrative procedures do not align with the *Business Inclusion and Development Policy*.

Objectives and Conclusions

1. Do policies and procedures exist to ensure consistent administration of Minority and Women-Owned Business Enterprise goals?

Generally, yes. The Small Business Center is relying on an outdated administrative guide for daily operational activities. At the same time, the Small Business Center is ensuring compliance with utilization goals and good faith efforts of the *Business Inclusion and Development Policy* for Minority and Women-Owned Business Enterprises. See [Observation C](#).

2. Are payments to Minority and Women-Owned Business Enterprise first tier subcontractors monitored?

No. Payments to first tier subcontractors are tracked in the B2GNow application; however, payments to first tier subcontractors are monitored informally and inconsistently. See [Observation A](#).

3. Are performance measures for local spending on Minority and Women-Owned Business Enterprises accurate?

No. The performance measures are reported using an encumbrance file which may not reflect actual spending and calculated using a definition of local spending that is not defined in the procedures. See [Observation B](#).

4. Are Minority and Women-Owned Business Enterprise utilization goals and good faith efforts documented during the procurement process in compliance with the *Business Inclusion and Development Policy*?

Yes. The utilization goals reported to the City Council when obtaining approvals for procurements are generally accurate.

Audit Results

Both *City Council Resolution 88-3428* and Administrative Directive 4-09, *Internal Control* prescribe policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

Observation A: Post Council Award Monitoring

The Small Business Center process to track first tier subcontractor utilization through the B2GNow application or monitor prompt payment by prime contractors to first tier subcontractors post council award is informal and inconsistent. As a result, the success of the *Business Inclusion and Development Policy* for post council award cannot be determined.

Two objectives identified in the *Business Inclusion and Development Policy* require the Small Business Center to:

- Track and monitor Minority and Women-Owned Business Enterprise participation including first tier subcontractor utilization with emphasis on first tier subcontracting utilization post council award.
- Track and monitor payments to: (1) prime contractors from the City; and (2) payments from prime contractors to first tier subcontractors with emphasis on prompt payment as outlined in Government Code, Section 2251.022.

Subcontractor Monitoring

The Small Business Center does not monitor or evaluate compliance of first tier subcontractor payments. The current process for post council award first tier subcontractor monitoring relies upon:

- The prime contractors' diligence to self-report their payments made to first tier subcontractors through the B2GNow application. When the prime contractors self-report their payments, B2GNow will send alerts to first tier subcontractors for verification. The verification process is dependent on the diligence of the subcontractors.
- Each department's process of monitoring and reporting on the prime contractor's compliance with actual value paid to first tier subcontractors.
- The nature of the contract. Depending on the project type, longevity, and contract phase, first tier subcontractors may not be used consistently throughout the contract.

These activities are not reviewed comprehensively to determine whether the initial goal cited by the prime contractor for first tier subcontractor payments was met. The Small Business Center will review first tier subcontractor payment compliance for Construction, and Architecture & Engineering procurements but only upon request by the subcontractor.

A department will send the Small Business Center FRM 213 that denotes the initial pledged value and actual value of work paid to first tier subcontractors. This information is considered along with FRM 513 and FRM 517 at an arbitrary level and does not involve actual verification of

payments to first tier subcontractors. If noncompliance of prime contractors is noted, the Small Business Center works to resolve the noncompliance informally with the first-tier subcontractors and noncompliance of the prime contractor is not documented.

Data Collection

Post council award monitoring of payments from prime contractors to first tier subcontractors requires data inputs from various sources. To complete tracking and monitoring of first tier subcontractor payments, the Small Business Center would need a centralized location of contracts, and payment schedules for each contract. Since these contract monitoring activities are divided between the Office of Procurement Services and departments that are retaining vendor services, data collection for subcontract payment and compliance cannot be evaluated by the Small Business Center.

Prompt Payment

Confirmation of prompt payment from prime contractors to first tier subcontractors in accordance with the *Business Inclusion and Development Policy* cannot be executed due to legal limitations. According to the City Attorney's Office the City cannot hold prime contractors accountable for payment to first tier subcontractors. Prime contractors are third parties to the City and first tier subcontractors are third parties to prime contractors.

As these activities for post council award monitoring cannot be executed formally and consistently, the City Council's ability to evaluate the success of the *Business Inclusion and Development Policy* for post council award cannot be determined.

Criteria

- ❖ *Business Inclusion and Development Policy*
- ❖ Administrative Directive 4-05, *Contracting Standards and Procedures*
- ❖ Standards for Internal Control in the Federal Government:
 - *Principle 10 – Design Control Activities*
 - *Principle 14 – Communicate Internally*

Assessed Risk Rating:

High

We recommend the **Director of the Small Business Center:**

A.1: Develop a process to monitor compliance of post council award activities for first tier subcontractor payments as described in the *Business Inclusion and Development Policy*.

A.2: Use the B2GNow application to track, document, and monitor the post council award resolution formally.

Observation B: Performance Measures

The monthly local spending¹ and Minority and Women-Owned Business Enterprise local spending² reported by the Small Business Center as part of performance measures for Dallas 365 and the Annual Budget Book were inaccurate. Performance measures are reported using encumbrance reports instead of actual spend reports. If performance measures are not accurate, a complete picture is not available for decision-making on the effectiveness of the program.

Calculation

The Small Business Center uses an encumbrance file to report on performance measures including *Certified Minority and Women-Owned Business Enterprise Spend with Vendors Located in Dallas*. A review of the purpose of the file, the contents, and application of the file to report performance measures identified that the encumbrance file may not be the correct file to use for performance measure reporting.

The encumbrance file lists the payments made by the City to the prime contractors from encumbered amounts for each contract. The listing includes all recurring and new encumbrances and is an ongoing list of payments made by the City to prime contractors. The use of the file to report performance measures results in the following errors:

- The local spending amount might be inflated as the encumbrance file may not reflect actual monthly results.
- The calculation process is incorrect. Currently, the Small Business Center removes the negative amounts (amount spent) and reports on the encumbered or approved procurements, which are original amounts approved for the length of the contract. If the encumbrance is used, then the negative amounts that show spending should be used.
- The encumbrance payments reflect payments from the City to prime contractors who are identified as local and/or Minority Women-Owned Business Enterprise prime contractors. The file does not show payments made by prime contractors to first tier subcontractors.

Local spending

The *Business Inclusion and Development Administration Guide* defines local Minority and Women-Owned Business Enterprise spending to include first tier subcontractors within the Dallas County limits. A reperformance of the Small Business Center internal procedures on reporting performance measures was completed for a sample of four months. The reperformance identified that certain zip codes not within the Dallas County limits were being

¹ The City's Local Preference Program values the participation of companies who have their principal place of business in the City of Dallas and who hire City of Dallas residents. Local Preference Supplier must satisfy one of the following requirements: proof of principal place of business located in City of Dallas; proof of local workforce composition including at least 100 full-time employees who are Dallas residents, at least 20% of its total full-time employees who are Dallas residents, or participation in the Workforce Development Program.

² Minority Women-Owned Business Enterprise local spending refers to the portion of local spending that is directly attributed to the first tier subcontractors that are certified as Minority Women-Owned Business Enterprise entities.

used. [Exhibit 1](#) shows the variance in reporting for the four months when Dallas County only zip codes are included.

According to management, the Dallas County local designation is determined by the vendor when they register with the City. This means that if a vendor self-reports as a local vendor and is outside of the Dallas County limits, then no verification of vendor designation is completed.

Exhibit 1:

Local Minority and Women-Owned Business Enterprise Variance

Month	Variance in Dollars		
	SBC	AUD	Variance
October 2020	15,414,029	15,378,554	35,745
July 2021	44,607,611	44,640,106	(32,495)
January 2022	6,677,986	6,668,349	9,637
May 2022	4,219,197	4,363,396	(144,199)

Source: ENC files and BIT Entry provided by Small Business Center for the audit period

Since City Council and City management rely on performance measures to assist in budgetary decisions, accuracy in reporting local spending of Minority and Women-Owned Business Enterprise are essential in evaluating the effectiveness of the program.

Criteria

- ❖ *Business Inclusion and Development Policy*
- ❖ *Business Inclusion and Development Administration Guide*
- ❖ Standards for Internal Control in the Federal Government, *Principle 14 – Communicate Internally*

Assessed Risk Rating:

Moderate

We recommend the **Director of Small Business Center:**

- B.1:** Identify the appropriate source data to use for performance measure reporting.
- B.2:** Define local business spending consistently for the program.
- B.3:** Verify and validate vendor self-registration to City's definition of local business.

Observation C: Program Administration

Minority and Women-Owned Business Enterprise operational procedures are not aligned with the *Business Inclusion and Development Policy*. Inaccurate, missing or poorly developed procedures cause inconsistencies in the administration of the program.

The Small Business Center is currently relying on the *Business Inclusion and Development Administration Guide* which has an effective date of January 11, 2012. The document was developed by the former Business Development and Procurement Services department ten years ago and has not been updated to incorporate *Business Inclusion and Development Policy* objectives approved by the City Council in 2020.

The *Business Inclusion and Development Administration Guide* focuses on various procurement activities that span from the development of forms, solicitation procedures, outreach activities, post council award functions, and sanctions for noncompliance. These various operational activities have since been redistributed between the Office of Procurement Services and one of the three divisions of the Small Business Center.

While there are similarities in certain activities in the two documents, the new policy does not consider vendor noncompliance consequences and professional judgment guidance and monitoring activities to support timely payments to subcontractors. See [Exhibit 2](#) below for policy differences and missing components between the two policy documents.

Exhibit 2:

Procedural Differences

Component	Business Inclusion and Development Administration Guide (2012)	Business Inclusion and Development Policy (2020)
Policy Development	Developed in 2012 by former Business Development and Procurement Services.	Developed in 2020 by the City Council and assigned to the Small Business Center in 2021.
Roles and Responsibilities	Roles and responsibilities are mapped to Business Development and Procurement Services.	Roles and responsibilities are defined by a position. Positions are not aligned within Small Business Center.
Participation Goals	Participation goals were developed in 2012.	Participation goals were updated in 2020.
Objectives	Has three objectives.	Has four objectives.

Component	Business Inclusion and Development Administration Guide (2012)	Business Inclusion and Development Policy (2020)
Contractor Requirements; Contract Changes and Approvals	Describes requirements for prime contractors to follow when stated goals are not met and changes to the contract after approval.	Not addressed.
Requirements for Review of Payments for Contracts that Exceed Certain Amounts.	Monthly review of payments for contracts over one million (\$1million).	Not addressed.
Subcontractor Payment Schedule	Payments to subcontractors within 10 days from being paid by the City.	Not addressed.
Encumbrance and Actual Expenditure Reports Review	Encumbrance and actual expenditure reports are reviewed to monitor compliance	Not addressed.
Documentation of Good Faith Efforts	Good Faith Efforts include documented evidence of communication with 10 percent of Minority and Women-Owned Business Enterprises contractors listed in the City of Dallas Certified Minority and Women-Owned Business Directory.	Not addressed.
Commercial Useful Function	Uses Commercial Useful Function to count toward participation goals.	Not addressed.
Reporting Compliance Activities	Not addressed.	Places emphasis on reporting compliance activities.

Source: *Business Inclusion and Development Administrative Guide (2012); Business Inclusion and Development Policy 2020*

Criteria

- ❖ *Business Inclusion and Development Policy*
- ❖ *Business Inclusion and Development Administration Guide*
- ❖ Standards for Internal Control in the Federal Government, *Principle 12 – Documentation of Responsibilities through Policies, Periodic Review of Control Activities*

Assessed Risk Rating:

Moderate

We recommend the **Director of Small Business Center:**

C.1: Adopt, modify and/or develop procedures to reflect daily activities to achieve Minority and Women-Owned Business Enterprise participation goals. At a minimum, the current procedures should reflect the updated utilization goals and procurement categories.

Emerging Risks

The Minority and Women-Owned Business Enterprises utilization goals do not consider all possible procurements completed by the City. Administrative Actions and Cooperative Purchasing Agreements both can contribute to the overall utilization goals. Additionally, the Small Business Center identified that some Minority and Women-Owned Business Enterprises may not be able to compete with procurement packages of \$50,000 or more. But Minority and Women-Owned Business Enterprises can compete with procurements that are under \$50,000 which are often purchased through Administrative Actions. The inclusion of these types of procurements might assist in the overall utilization goals for Minority and Women-Owned Business Enterprise spending.

Impact: The inclusion of these additional procurements and their composition can assist in meeting the City's overall goal of increased Minority and Women-Owned Business Enterprise spending.

Appendix A: Background and Methodology

Definitions

Business Inclusion and Development (BID) Policy – Policy to encourage participation by Minority and Women-Owned Business Enterprises in the City's programs/projects to the greatest extent feasible.

First Tier Subcontractors are only locally certified Minority and Women-Owned Business Enterprise subcontractors, suppliers, or sub-consultants with a direct contractual relationship with the prime contractor

Minority and Women-Owned Business Enterprise (M/WBE) firms are those that have met certain requirements and have been certified by one of three certification agencies recognized by the City of Dallas: North Central Texas Regional Certification Agency, Dallas Fort Worth Minority Supplier Diversity Council, and Women Business Council-Southwest. These firms are at least 51% owned and controlled by one or more socially and economically disadvantaged individuals, or in the case of any publicly owned business, of which at least 51% of the stock is owned by one or more socially and economically disadvantaged individuals.

Prime contractor is a company or firm that is awarded a city contract by either the City Council or Administrative Action.

Background

It is the policy of the City of Dallas to involve certified Minority and Women-Owned Business Enterprises to the greatest extent feasible on the City's construction, general services, and professional services contracts. In consideration of this policy, the City of Dallas has adopted the *Business Inclusion and Development Policy* for all City of Dallas contracts.

The *Business Inclusion and Development Policy* applies to all contracts for the purchase of goods and services over \$50,000 with a special emphasis on those contracts with first tier subcontracting opportunities. This provision supersedes any departmental plans or procedures in conflict unless otherwise noted.

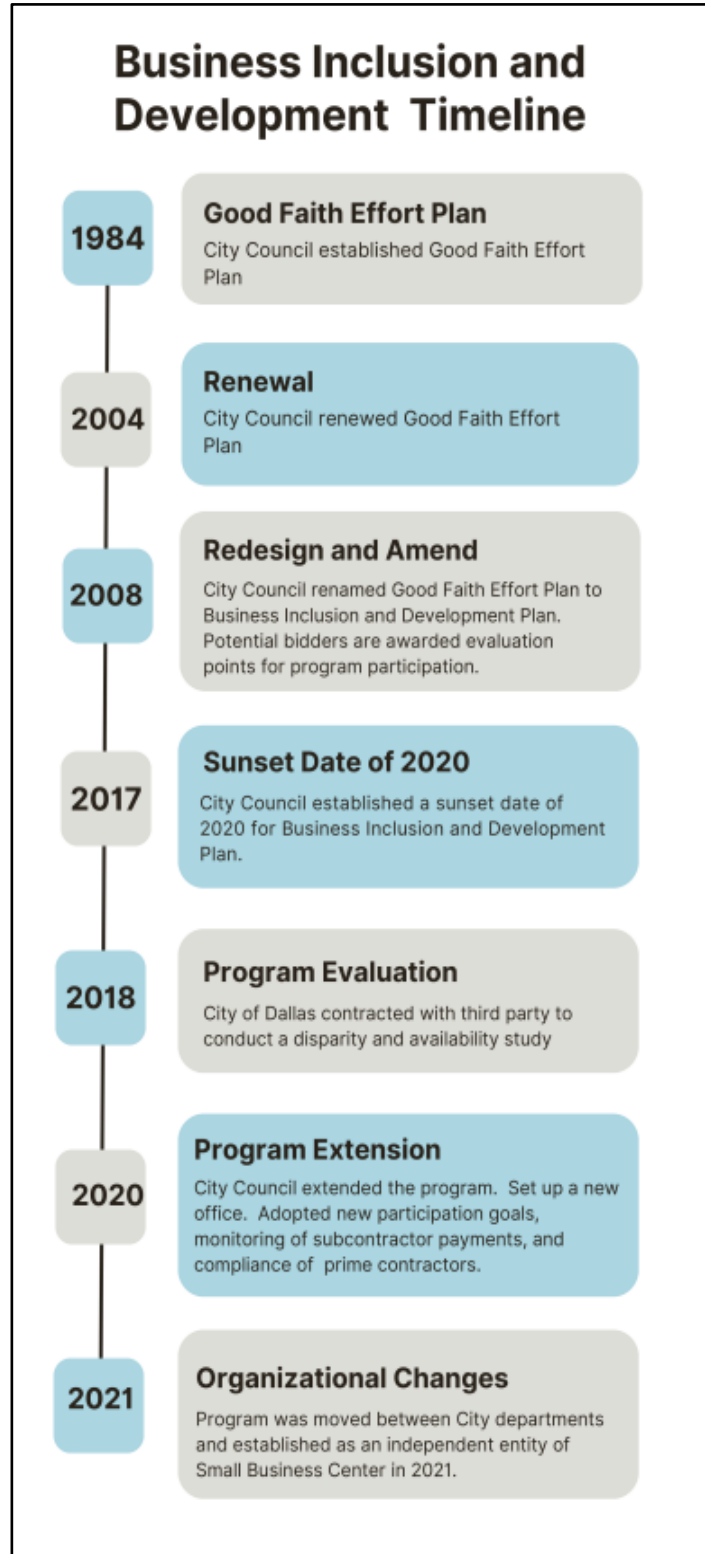
The *Business Inclusion and Development Policy* has four objectives. The audit scope focused on the *Business Inclusion and Development Policy* objectives related to providing procedures for monitoring, enforcement, and compliance with Minority and Women-Owned Business Enterprise requirements post council award. The City Manager is the designated Liaison Officer for the program and delegates daily operational activities to the Small Business Center. The Small Business Center was established on October 1, 2021, with three divisions: Workforce, Entrepreneurship, and Business Diversity.

The *Business Inclusion and Development Policy* and its activities are managed by the Business Diversity division of the Small Business Center. Business Diversity responsibilities are to:

- Develop, manage, and implement policy.
- Maintain and provide a directory of certified Minority and Women-Owned Business Enterprise vendors.
- Maintain a directory of the City of Dallas vendors.
- Track and monitor participation including subcontractors with emphasis on post-council award.
- Track and monitor payments from the City to prime contractors, from prime contractor to subcontractors.
- Grant evaluation points during the procurement process.
- Communicate Minority and Women-Owned Business Enterprise goals to departments.
- Maintain and submit accurate and current reports of performance of goals.

The City of Dallas maintains the option to waive the *Business Inclusion and Development Policy* criteria when there is no opportunity for Minority and Women-Owned Business Enterprise inclusion. Before the award of the contract, the City of Dallas will require bidders/proposers to document good faith efforts to meet the established goals.

Failure to adequately document good faith efforts to obtain Minority and Women-Owned Business Enterprise participation is considered noncompliance. The *Business Inclusion and*



Development Policy goals that were adopted in 2020 after the Availability and Disparity Study are noted in [Exhibit 3](#) below.

Exhibit 3:

Business Inclusion and Development Policy Goals Approved in 2020

Procurement Category	Goal
Construction	32%
Architecture & Engineering	34%
Professional Services	38%
Goods	32%
Other Services	0%

Source: *Business Inclusion and Development Policy 2020*

There are three agencies that certify Minority and Women-Owned Business Enterprise ownership and control and provide Minority and Women-Owned Business Enterprise certification services for the City of Dallas. They are the North Central Texas Regional Certification Agency, the Dallas Fort Worth Minority Supplier Development Council, and the Women's Business Council-Southwest. The City of Dallas is a member of all three agencies.

The Small Business Center reports on its progress and compliance with goals through performance measures. For fiscal year 2021-2022 the performance measures set were:

- Percentage of City spend with vendors located in Dallas – 40%
- Percentage of certified Minority -Women-Owned Business Enterprises spend with vendors located in Dallas – 65%

Methodology

The audit methodology included: (1) interviewing personnel from the Small Business Center, Information Technology Services, Financial Division, and Office of Procurement Services; (2) reviewing internal policies and procedures, and (3) performing various reperformance and recalculations of procedures. In addition, all five components of *Standards for Internal Control in Federal Government* were considered.

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Mamatha Sparks – Audit Manager, CIA, CISA, CISSP, CRISC
 Carron Perry – Engagement Manager, CIA
 Jennifer Phung – Senior Auditor, CIA

Appendix B: Management's Response

See following pages for Audit Acknowledgement Letter and Management Responses.

Memorandum



DATE: February 14, 2024

TO: Mark S. Swann – City Auditor

SUBJECT: Response to the Audit of Small Business Center – Minority and Women-Owned Business Enterprises

This letter acknowledges the City Manager's Office received the *Audit of Small Business Center – Minority and Women-Owned Business Enterprises (M/WBE)* and submitted responses to the recommendations in consultation with the appropriate City department.

The Small Business Center (SBC) was established in December 2021 and serves the community by promoting business diversity, workforce development, and entrepreneurship programs. The SBC is pleased with the progress it has made in a little over two years but recognizes there are opportunities for continuous improvement.

SBC will leverage the auditor's recommendations to improve its processes.

Specifically, SBC will:

- Implement a BID tracking and post-award monitoring process to ensure minority/women business enterprise (M/WBE) prime contractors and subcontractors are timely reporting accurate data;
- Track, document, and monitor the post-council award in the B2GNow application. Update the Business Inclusion and Development Policy and Administrative Guide to ensure an effective compliance monitoring and tracking process;
- Work with relevant departments to ensure the planned upgrade to the financial system provides the necessary data for the SBC to transition from reporting M/WBE participation based on encumbrance data to total annual spend data;
- Revise the Business Inclusion and Development Administration Guide to define local business spending in alignment with existing SBC practices;
- Implement a process to verify the accuracy of the vendor self-reported addresses conform to the City's definition of a local business; and
- Ensure the revised Business Inclusion and Development Policy and Business Inclusion and Development Administration Guide incorporate the utilization goals and procurement categories.

Response to the Audit of Small Business Center – Minority and Women-Owned Business Enterprises
February 14, 2024
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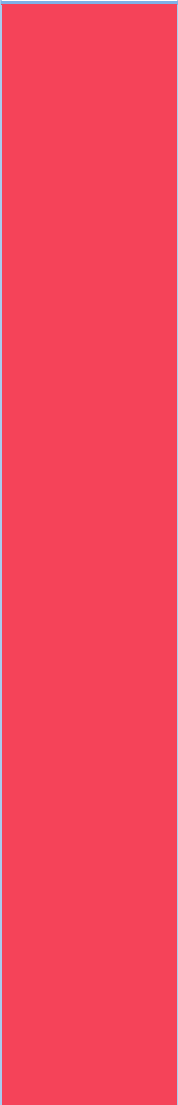
Sincerely

A handwritten signature in blue ink, appearing to read 'T.C. Broadnax', written over a circular blue ink scribble.

T.C. Broadnax
City Manager

C: Genesis D. Gavino, Chief of Staff
Jack Ireland, Chief Financial Officer
Kimberly Bizer Tolbert, Deputy City Manager
Joyce Williams, Director, Small Business Center

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date
High	We recommend the Director of Small Business Center:			
	<p>A.1 Develop a process to monitor compliance of post council award activities for first tier subcontractor payment as described in the <i>Business Inclusion and Development Policy</i>.</p>	<p>Agree</p> <p>The Small Business Center (SBC) began reviewing the existing compliance process in December 2022. Through this review, SBC has identified opportunities to improve communication with relevant departments.</p> <p>Additionally, SBC has identified the current financial system's limited reporting capability as a constraint that limits SBC's ability to monitor compliance efficiently.</p> <p>SBC is working with relevant departments to help ensure a planned upgrade to the financial system will provide an efficient process for extracting the necessary data from the financial system to allow for an efficient monitoring process.</p> <p>Additionally, SBC will update the Business Inclusion and Development Policy (Policy) and Business Inclusion and Development Administration Guide (Guide) to ensure better communication and an effective compliance monitoring process.</p> <p>SBC anticipates the new process will include:</p> <ul style="list-style-type: none"> • A robust BID tracking and a post-award monitoring process to ensure prime contractors and 	9/30/2024	9/30/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
			subcontractors are timely reporting accurate data; and <ul style="list-style-type: none"> • Ensure departments provide timely notification to proceed to the prime contractors. 		
	<p>A.2 Use the B2GNow application to track, document, and monitor the post council award resolution formally.</p>	<p>Agree</p>	<p>SBC's dedicated BID staff will formally track, document, and monitor the post-council award.</p> <p>In addition, SBC will enhance communication with involved parties, ensuring a clear understanding of expectations by following up with prime contractors, subcontractors, and departments related to compliance concerns. In addition, SBC will develop an escalation strategy should initial follow-up with prime contractors, subcontractors, and departments not remedy compliance concerns.</p> <p>Finally, SBC will ensure transparency by providing annual compliance reports to departments on all contracts involving M/WBE prime and sub-contracting participation.</p>	<p>9/30/2024</p>	<p>9/30/2025</p>

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date	
Moderate	We recommend the Director of Small Business Center:				
	<p>B.1 Identify appropriate source data to use for performance measure reporting.</p>	<p>Agree</p>	<p>The current financial system does not provide the data necessary for efficient Dallas 365 Performance Measure Reporting.</p> <p>SBC is working with relevant departments to ensure the planned upgrade to the financial system will capture the necessary information to allow SBC to transition from reporting M/WBE participation based on encumbrance data to total spending data.</p> <p>Once the upgrade is complete, SBC will supplement this effort by developing and testing formal procedures for calculating the performance measures.</p>	<p>9/30/2024</p>	<p>9/30/2025</p>
	<p>B.2 Define local business spending consistently for the program.</p>	<p>Agree</p>	<p>SBC will revise the Guide to clarify local business spending. In addition, the Guide will provide a consistent process to verify a vendor's qualification as a local market vendor, based upon the 2020 A&D Study.</p> <p>Specifically, SBC has:</p> <ul style="list-style-type: none"> Revised the list of eligible ZIP Codes to allow for the consistent identification of local businesses; and 	<p>9/30/2024</p>	<p>9/30/2025</p>

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
			<ul style="list-style-type: none"> Implemented a process to investigate whether a vendor in specific ZIP codes qualifies as a local market vendor. <p>Additionally, SBC will finalize revisions to the Guide, and review qualifying ZIP Codes annually and make necessary updates.</p>		
	<p>B.3 Verify and validate vendor self-registration to City's definition of local business.</p>	<p>Agree</p>	<p>SBC will implement a process to verify the accuracy of the vendor's self-reported addresses conforms to the City's definition of a local business.</p> <p>Specifically, SBC will vet all existing vendors registered as local businesses. Further, SBC will require new vendors to submit appropriate documentation at registration and periodically. SBC will review the documentation to ensure initial and continued eligibility.</p>	<p>9/30/2024</p>	<p>9/30/2025</p>
	<p>C.1 Adopt, modify and/or develop procedures to reflect daily activities to achieve Minority and Women-Owned Business Enterprise participation goals. At a minimum, the current procedures should reflect the updated utilization goals and procurement categories.</p>	<p>Agree</p>	<p>SBC began revising the draft BID Policy and the Administrative Guide in December 2023. The revised guidance includes clarified forms and directions that aid vendors in reporting data.</p> <p>Specifically, SBC will:</p> <ul style="list-style-type: none"> Update the Guide with the utilization goals and procurement categories, and 	<p>9/30/2024</p>	<p>9/30/2025</p>

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
			<p>include a process to monitor vendors for compliance;</p> <ul style="list-style-type: none"> • Capture M/WBE spend, inclusive of Administrative Actions, cooperatives, and lowest bid, for calculating and monitoring overall utilization goals; • Implement a process for calculating and monitoring Tier II (e.g., subcontractor) spend to the Guide and Policy; and • Consistently provide BID Form 623 (Bid Pre-Proposal Form) and BID Form 627 (Workforce Composition) to vendors for M/WBE procurements to enhance communication regarding vendor data submission requirements. 		



Audit of Procurement Marketing Practices

February 22, 2024

Mark S. Swann, City Auditor

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Executive Summary

Objective and Scope

The objective of this audit was to determine if the Office of Procurement Services' procurement marketing practices reflect best practices to promote competition and competitive pricing.

The scope of the audit was operations between March 1, 2021, and March 31, 2023.

Recommendations

No recommendations are associated with this report.

Background

The Office of Procurement Services is nationally accredited by the National Institute of Governmental Purchasing, as a Quality Procurement Department. It is responsible for purchasing the City of Dallas' goods and services and provides oversight for contract management across all City of Dallas departments.

Vendors interested in doing business with the City of Dallas must register electronically on the Bonfire system. Bonfire keeps vendors informed of procurement opportunities and bid process.

The City of Dallas Small Business Center is responsible for assisting small emerging firms increase opportunities.

Observed Conditions

The Office of Procurement Services provides vendor support on registering and using Bonfire, reviews bids for responsiveness and minimum requirements, and performs high-level analysis of pricing and trend analysis for appropriateness. The Sustainable Procurement Working Group is in the developmental stage of analyzing Citywide purchases for efficiency and waste reduction opportunities and furthering positive social, economic, and environmental outcomes including local preferences and supplier diversity.

The Office of Procurement Services does not actively recruit new vendors, which is the responsibility of the Small Business Center, establish bid award criteria, or evaluate bid pricing/cost, which are the responsibility of the soliciting department.

Objectives and Conclusions

1. Do the Office of Procurement Services' procurement marketing practices reflect best practices to promote competition and competitive pricing?

Yes. The Office of Procurement Services' use of Bonfire and the Procurement Quarterly ensures vendors are informed of procurement opportunities and the bid process for bids vendors want to act on. The Office of Procurement Services provides: (1) directions on how to use and register on Bonfire; and, (2) debriefs of factors that hinder successful awarding of the solicitation.

Appendix A: Methodology

Methodology

The audit methodology included: (1) interviewing personnel from Office of Procurement Services; (2) reviewing policies and procedures, applicable Administrative Directives, and best practices; and, (3) evaluating internal controls and operational processes. In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Natalie Martinez – In-Charge Auditor

Rory Galter, CPA – Engagement Manager

Appendix B: Management’s Response

Memorandum



DATE: February 15, 2024

TO: Mark S. Swann – City Auditor

SUBJECT: Response to Audit of Procurement Marketing Practices

This letter acknowledges the City Manager’s Office and the Office of Procurement Services received the *Audit of Procurement Marketing Practices*.

The Office of Procurement Services is satisfied that the audit concluded that the department’s marketing practices reflect best practices to promote competition and competitive pricing.

We continuously strive to ensure the City has a diverse vendor community and receives value in its purchases. The Office of Procurement Services will continue to develop processes for analyzing Citywide purchases for efficiency and waste reduction opportunities and furthering positive social, economic, and environmental outcomes including local preferences and supplier diversity.

We appreciate the professionalism and quality of work that your staff demonstrated throughout this engagement.

Sincerely



T.C. Broadnax
City Manager

C: Genesis D. Gavino, Chief of Staff
Jack Ireland, Chief Financial Officer
Danielle Thompson, Director, Office of Procurement Services

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Audit of Dallas Police Department Body Worn and In Car Camera Operations

February 26, 2024

Mark S. Swann, City Auditor

Mayor

Eric L. Johnson

Mayor Pro Tem

Tennell Atkins

Deputy Mayor Pro Tem

Carolyn King Arnold

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Executive Summary

Objective and Scope

The objectives of this audit were to:

- Determine if policies and procedures, directives, and general operations comply with state and local government requirements and meet best practices for law enforcement agencies.
- Determine if internal controls are designed to ensure the efficient and effective management, administration, and compliance of body worn camera and in car camera operations performed by the Dallas Police Department.
- Ensure that controls over the selected critical operations are operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, procedure, directives, and general orders.
- Determine whether the necessary information security operations and procedures are utilized to manage and maintain camera operations footage for body worn and in car cameras operations.

The scope period was from October 1, 2020, through October 31, 2022.

Background

Dallas Police Department uses body worn and in car cameras to record its responses to emergencies and interactions with the public. These cameras recorded more than 2.1 million videos, or an average of 5,910 videos every day, in calendar year 2022.

The efficient, effective, and consistent administration and management of the Dallas Police Department's body worn and in car camera operations for the City of Dallas is critical to the management of risks, compliance with requirements associated with City directives and operations, and meeting nationwide best practices.

The City Auditor's Office contracted with Weaver & Tidwell, L.L.P. (Weaver) to perform this audit.

Observed Conditions

Dallas Police Department has taken strides to define and streamline management functions and requirements to ensure body worn and in car camera operations are performing as expected.

Specific areas for improvement include updates to procedures, supervisory review, training, responses to open records requests, including cybersecurity governance.

Since the audit period, Dallas Police Department updated its retention policy, increasing the time frame footage is retained to further ensure availability of the videos.

See the full Weaver report in [Appendix A](#) for details.

Objectives and Conclusions

1. Do policies and procedures, directives, and general operations comply with state and local government requirements and meet best practices for law enforcement agencies?
 - **Generally, yes.** Dallas Police Department maintains comprehensive policies, procedures, directives, and General Orders. General Order 332.03 could be improved by including more detailed descriptions of body worn camera categories and requiring periodic training on the General Order's requirements.
2. Are internal controls designed to ensure the efficient and effective management, administration, and compliance of body worn camera and in car camera operations performed by the Dallas Police Department?
 - **Generally, yes.** Dallas Police Department established effective internal controls. The controls could be strengthened by additional supervisor review and resources for responding to public information requests.
3. Are controls over the selected critical operations operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, procedure, directives, and general orders?
 - **Generally, yes.** The body worn and in car camera operations were generally operating as designed. Officers did not always end body worn camera recordings with the required conclusion announcement, used to signify the call response was over.
4. Are the necessary information security operations and procedures utilized to manage and maintain camera operations footage for body worn and in car cameras operations?
 - **Generally, yes.** While information security procedures and requirements are in place, additional required controls include:
 - A body worn camera operations security program that documents required security practices is needed along with other controls.
 - Formal definition of the privileged user access and consistent role review process.
 - Defined security configuration baselines.
 - Enhanced asset inventory reconciliation and maintenance operations.

Audit Results

See [Appendix A](#) for the Weaver report.

Background and Methodology

Background

Dallas Police Department uses body worn and in car cameras to record interactions with the public and responses to emergencies. These cameras are worn on officer's chests and installed on both the dashboard and the inside of the vehicles to show where the vehicle is headed and its back seat.

Dallas Police Department general orders cover the operations of body worn and in car cameras and officers receive training on operating both. This audit was included in the 2023 Fiscal Year Audit Plan to evaluate Dallas Police Department's internal controls for operating the cameras. The audit was contracted out to Weaver.

Dallas Police Department had 2,365 body worn cameras and 625 in car cameras, which combined to record 2,157,238 videos in calendar year 2022. The cameras are increasing.

In Fiscal Year 2024, the City is expected to pay Axon almost \$8.2 million for 3,000 body worn cameras and 3,245 tasers for the Dallas Police Department as part of a larger 10-year \$147 million agreement with Axon that also includes other equipment and departments, according to Dallas Police Department documents. The specific cost for all equipment and staff responsible for body and in car cameras is not specified in the Dallas Police Department budget as these costs are included in larger program budgets.

Before the audit began, in November 2022 the Dallas Police Department conducted its own internal review identifying that 89,000 (2 percent) of the 3.8 million videos on hand were not categorized and that some categorized videos had been deleted. As a result, the Dallas Police Department in early 2023 extended retention periods for all videos to delay their deletion.

Video categorization and tagging are management processes that can be automatically added by the system or manually added by the officer to identify the content of the video and connect it to relevant case files and to the retention periods for similar videos. If the video is connected to a case, it is not deleted until the case is completed, and its specific retention period has elapsed. While the retention periods have been extended for all videos, the categorization and tagging processes are important because they provide information about the type of videos and whether it is connected to a case file.

There were several recent changes or updates to operations after both the audit scope period and the completion of audit fieldwork:

- Responsibility for Dallas Police Department video open records requests was transferred from Dallas Police Department to the City Secretary's Office in August 2023.

City management also released new citywide guidance on camera oversight, Administrative Directive 6-19, *Camera Governance* in November 2023.

- A separate Dallas Police Department internal review of videos related to 113 homicide cases was also conducted and a summary was released in December 2023.

Methodology

To accomplish our audit objectives, we performed the following steps:

- Interviewed City personnel.
- Reviewed requirements, procedures and best practices for body worn and in car camera operations.
- Retained Weaver to conduct this audit. See the methodology section of the report in [Appendix A](#) for a more complete description of the work performed.
- Conducted a survey of Dallas Police Department and four other large police departments (Houston, Fort Worth, Columbus, and El Paso) on their body worn and in car camera operations.
- Considered risk of fraud, waste, and abuse.
- Considered all five internal control components of the *Standards for Internal Control in the Federal Government*

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Major Contributors to the Report

Weaver Risk Advisory Services

Brandon Tanous, CIA, CFE, CGAP, CRMA – Partner

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Kylie Merz – Associate II

Office of the City Auditor

Dan Genz, CIA, CFE, CISA – Engagement Manager

Appendix A: Weaver Report

See Weaver's report on the following pages.

City of Dallas

Internal Audit Report of the Dallas Police Department
Body Worn and In Car Camera Operations

Report Date: February 26, 2024

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Mark S. Swann | City Auditor
City of Dallas
Office of the City Auditor
1500 Marilla Street, Room 2FN
Dallas, TX 75201

The accompanying report presents the procedures, results and recommendations relating to our internal audit over the body worn camera and in car camera operations of the Dallas Police Department. The audit included an assessment of operations and procedures, an evaluation of internal controls, along with testing related to operational and information technology/security related operations for administering and managing the body worn camera and in car camera operations. Our procedures were performed in accordance with Government Auditing Standards for Performance Audits. Our procedures do not represent an audit of the financial statements of the City in accordance with United States Generally Accepted Government Auditing Standards (GAGAS).

The objectives of this audit were as follows:

- Determine if policies and procedures, directives, and general operations comply with state and local government requirements and meet best practices for law enforcement agencies. [Operational]
- Determine if internal controls are designed to ensure the efficient and effective management, administration, and compliance of body worn camera and in car camera operations performed by the Dallas Police Department. [Operational]
- Ensure that controls over the selected critical operations are operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, procedure, directives, and general orders. [Operational]
- Determine whether the necessary information security operations and procedures are utilized to manage and maintain camera operations footage for both body worn camera operations and in car camera operations. [Information Technology/Security]

To accomplish these objectives, we conducted interviews and walkthroughs with the Dallas Police Department, and Information & Technology Services personnel that have responsibilities in managing and/or monitoring the body worn camera operations and in car camera operations, inspected documentation (e.g., policies, directives, procedures, plans), reviewed relevant system configurations and sample evidence, and tested sample transactions to gain an understanding of the current operations and defined requirements in place. We evaluated the existing policies and operations in their current state. Our coverage period was from October 1, 2020, through October 31, 2022.

The following report and appendices summarize the recommendations and emerging risks identified throughout the audit.

This report is intended solely for the information and use by City Management and the Office of the City Auditor and is not intended to be used, and should not be used, by anyone other than the specified parties.

WEAVER AND TIDWELL, L.L.P.
Dallas, Texas

February 26, 2024

Weaver and Tidwell, L.L.P.
2300 N. Field Street, Suite 1000 | Dallas, Texas 75201
Main: 972.490.1970

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department
February 2024

Background

The efficient, effective, and consistent administration and management of the Dallas Police Department's body worn camera operations and in car camera operations for the City of Dallas is critical to the management of risks, compliance with requirements associated with City directives and operations, and meeting nationwide best practices.

The audit over body worn camera operations and in car camera operations was included in the Office of the City Auditor's Fiscal Year 2023 Audit Work Plan. The preliminary plan sought to answer:

- Is the body worn camera operations program, related directives, and operations for securely managing the system in alignment with compliance and regulatory requirements documented, communicated, and maintained to minimize the potential for camera operations and evidence related incidents?
- Is the in car camera operations program, related directives, and procedures for securely managing the system in alignment with compliance and regulatory requirements documented, communicated, and maintained to minimize the potential for camera operations and evidence related incidents? ¹

Primary responsibility for the body worn camera operations and in car camera operations program rests with the Dallas Police Department's Body Camera Operations Unit and DVR Review Team with information technology and security related practices falling under a shared responsibility with the City's Information & Technology Services Department. The success of the program at the time of the audit relied upon the third-party relationship with Axon to assist with operational efficiency and security of evidence and camera operations management through the Evidence.com platform. The overall body worn camera operations and in car camera operations are currently entering a multi-year "phase out" period in which the legacy in car camera (L3) operations are being sunset and will be upgraded to the newer Axon platform.

Weaver and Tidwell, L.L.P. was contracted by the Office of the City Auditor to perform a design and effectiveness evaluation of the body worn camera operations and in car camera operations related operations based on defined City policies, procedures and industry practices; however, the objectives of the internal audit were modified at the direction of the Office of the City Auditor, as detailed in Appendix A, based on the active transition from L3 to Axon, which included a primary focus on the Axon camera operations systems.

Audit Scope and Objectives

The audit was designed to assist management in identifying policy, operations, and procedural control gaps within the in-scope areas of review to improve overall compliance, efficiency, and effectiveness of the Dallas Police Department's body worn camera operations and in car camera operations. The scope of the audit was executed in two concurrent phases. Phase 1 developed a baseline understanding of the people and operations related to the body worn camera operations and in car camera operations program to evaluate the Dallas Police Department's practices and internal controls for operating the in-scope camera operations systems effectively and compliantly. Phase 2 reviewed practices for select information technology/security process areas related to the administration of the body worn camera operations and in car camera operations program as well as the management of camera operations evidence.

¹ The Dallas Police Department had been utilizing the L-3 in car camera system operations through September 2021, at which time they began a multi-year transition to Axon for in car camera operations. As such, our testing focused on Axon while still encapsulating L-3 data as both were utilized during our coverage period.

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

Overall, the audit included an evaluation of the risks, internal controls, and adequacy of the Dallas Police Department's body worn camera operations and in car camera operations, security administration, as well as the adoption of nationwide best practices.

Key Objectives

- **Objective A [Phase 1]:** Determine if policies and procedures, directives, and general orders comply with state and local government requirements and meet best practices for law enforcement agencies.
- **Objective B [Phase 1]:** Determine if internal controls are designed to ensure the efficient and effective management, administration, and compliance of body worn camera operations and in car camera operations performed by the Dallas Police Department.
- **Objective C [Phase 1]:** Ensure that controls over the selected critical operations are operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, procedure, directives, and general orders.
- **Objective D [Phase 2]:** Determine whether the necessary information security operations and procedures are utilized to manage and maintain camera operations footage for both body worn camera operations and in car camera operations.

In order to achieve the objectives of our audit, we evaluated the following operations and practices performed in their current state within two phases:

Phase 1 – Operational

- Issuance, installation, and replacing/refreshing of body worn camera operations and in car camera operations
- Policy, procedure, and training on use, recording, and positioning of cameras
- Record tagging, retention, and storage
- Review and evaluation cycle of recorded footage, including incident specific and non-incident specific
- Management and addressing of open record requests
- Coordination with the Office of Community Police Oversight

Phase 2 - Information Technology and Security

- Data storage and transmission operations
- Data recording and related system components
- Administrator access to relevant systems and evidence
- Criminal Justice Information Services security policy areas
- Guiding criteria

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

The audit was performed between January 4, 2023, and June 30, 2023, and included interviewing key personnel within the City, Dallas Police Department, and Information & Technology Services to gain an understanding of the current operations in place, sample testing of transactions (e.g. evidence retention), inspecting existing documentation and configurations related to the in scope operation and system components, reviewing policies and procedures, directives, and general orders, and evaluating the internal controls over the operations in order to ensure relevant risks were addressed. Refer to Appendix B for additional information on the procedures conducted and Appendix C for documentation inspected throughout the audit.

To ensure the necessary components and risk areas were considered as part of this audit, the following criteria was utilized to inform our procedures:

- **Phase 1 Guiding Criteria:**

- Dallas Police Department's policies and procedures, administrative directives, and general orders
- State of Texas' codes and statutes
- Committee of Sponsoring Organizations of the Treadway Commission 2013 Internal Control Framework
- Best practices and guidelines for law enforcement agencies (Texas Law Enforcement Best Practices, International Association of Chiefs of Police, etc.)

- **Phase 2 Guiding Criteria:**

- Dallas Police Department's policies and procedures, administrative directives, and general orders
- National Institute of Standards and Technology Cybersecurity Framework
- Criminal Justice Information Services Security Policy
- Police Executive Research Forum Implementing a Body Worn Camera Operations Program

Executive Summary

Positive Highlights

The City's body worn camera operations program is supported by a leading industry product vendor, Axon, that provides robust solutions and capabilities to ensure officers can execute job duties in the field efficiently and securely. The Dallas Police Department has taken strides to define and streamline management functions and requirements (e.g., evidence uploads, device upgrades/replacements, secure sharing of evidence, etc.) to ensure body worn camera operations and in car camera operations are operated as expected. Further, our testing identified the following positive takeaways:

- The Dallas Police Department transitioned from L-3 to Axon for their in car camera operations which has created efficiency and versatility in the way they operate and allows the Dallas Police Department to better track, monitor, and manage in car camera operations activity.

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

- The Dallas Police Department recently updated their retention policy, increasing the time frame with which they will retain specific footage based on the tagging of said footage which ensures further integrity, transparency, and obtainability.

Summary of Results

Through our audit procedures, we identified **13** recommendations. The listing of recommendations includes those items that have been identified and are non-compliance issues with documented Dallas Police Department policies and procedures, rules and regulations required by law, or where there is a lack of procedures or internal controls in place to cover risks to the City of Dallas. The following details the risk ranked recommendations per audit phase.

Summary of Recommendations – City of Dallas Internal Audit of Body Worn and In Car Camera Operations			
Phase	High	Moderate	Low
Phase 1 – Operational	2	2	-
Phase 2 – Information Technology / Security	-	2	4
Total	2	4	4

*Three recommendations are considered emerging risks and are not risk rated and shown in the table above.

A summary of our results, by audit objective, is provided in the table below. Please see **Appendix A** for an overview of the *Assessment and Risk Ratings*.

Key Recommendations

SCOPE AREA	KEY RECOMMENDATIONS
<p>Objective A: Determine if policies and procedures, directives, and general orders comply with state and local government requirements and meet best practices for law enforcement agencies.</p>	<p>The Dallas Police Department maintains comprehensive policies, procedures, directives, and general orders. However, we identified opportunities to strengthen existing guidance, including:</p> <ul style="list-style-type: none"> Revision of General Order 332.03 to include detailed descriptions for each category of body worn camera operations footage to ensure proper reference to authoritative criteria. Revision of General Order 332.03 to include requirements for periodic trainings over general orders and policies related to use and management of body worn camera operations.

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

SCOPE AREA	KEY RECOMMENDATIONS
<p>Objective B: Determine if internal controls are designed to ensure the efficient and effective management, administration, and compliance of body worn camera operations and in car camera operations performed by the Dallas Police Department</p>	<p>The Dallas Police Department has established effective internal controls. However, we identified opportunities to strengthen existing controls through the following measures:</p> <ul style="list-style-type: none"> • Strengthening requirements of supervisor review to ensure officers are following proper categorization, retention, and use of body worn camera operations. This includes increasing the volume of monthly body worn camera operation audits. • Onboarding additional resources who are responsible for the oversight and monitoring of open records requests processed by designated Open Records Request coordinators.
<p>Objective C: Ensure that controls over the selected critical operations are operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, procedure, directives, and general orders.</p>	<p>Controls are in place and operating sufficiently. However, not all are consistently executed as designed. We identified the following opportunity for improvement:</p> <ul style="list-style-type: none"> • Operations strengthening frequency requirements of supervisory review to monitor proper ending of body worn camera operations and in car camera operations footage.
<p>Objective D: Determine whether the necessary Information Security operations and procedures are utilized to manage and maintain camera operations footage for both body worn camera operations and in car camera operations.</p>	<p>Controls and operations are in place; however, not all risks are sufficiently covered. We identified the following opportunities for improvement:</p> <ul style="list-style-type: none"> • Define and develop a body worn camera operations security program/charter that documents the required security practices related to maintaining the security of the body worn camera operations system. • Formally define the privileged user access and consistent role review process to ensure potential issues and action items highlighted are tracked to completion. • Define security configuration baselines to specify the security requirements and system hardening procedures to periodically assess camera operations for insecure configurations or potential "configuration drift" from approved baselines. • Enhance the asset inventory reconciliation and maintenance operations to address incomplete or duplicative data.

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

Conclusion

Based on our evaluation, the body worn and in car camera operations at the Dallas Police Department have procedures, systems, and controls in place to conduct effective management of the significant operations at the Dallas Police Department. We recommend continued diligence in maintaining internal controls over the operations to ensure effective, efficient, and compliant operations.

However, we identified opportunities to strengthen the current operations and improve the effectiveness of controls within the Dallas Police Department to ensure continued effectiveness, efficiency, and compliance in the future. Most significantly, the City should focus on refresher training by developing a subsequent training operation that includes any updates to general orders and body worn camera operations and in car camera responsibilities to ensure compliance and effective performance of these procedures. The City operations should also enhance their review procedures of recorded footage to ensure that the Dallas Police Department is following proper categorization, retention, and use of body worn camera operations and in car camera operations. Lastly, the City should continue enhancing their Open Records Request operations and procedures to ensure the timely fulfillment of formal public information requests.

Based on our evaluation of information security measures, the City has developed a good foundation of practices within the vendor platform for body worn camera management. The newly supplemented general orders highlight the expanded use of body worn camera operations systems. This growing use and the necessary detailed procedures, operations, and routine practices can be further defined and documented within a centralized management point, such as an operation or charter to codify the growing institutional knowledge, requirements, and relied upon security controls. Additionally, the specific security configurations and settings that are necessary and implemented should be documented and maintained as a baseline that can be reviewed periodically and updated as changes are approved to ensure that insecure settings do not exist and that actual configurations applied do not deviate from those expected. Furthermore, the current body worn asset inventory demonstrated incomplete and duplicate data, which indicates an improvement opportunity for the periodic reconciliation and maintenance of inventories used within the system to ensure appropriate application of security controls.

We recommend that the Office of the City Auditor perform follow-up review procedures over the recommendations outlined in this report.

Detailed Observations, Recommendations, and Emerging Risks

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department
February 2024

Detailed Observations, Recommendations, and Emerging Risks

Our procedures included interviewing key personnel within the Dallas Police Department with oversight over the body worn camera operations and in car camera operations to gain an understanding of the current operations in place, examining existing documentation, evaluating the internal controls over the process, and testing the effectiveness of the controls in place.

Phase 1 Observations

Observation 01 – HIGH – Defined Categorization of Body Worn Camera Operations Footage: The Dallas Police Department lacks a robust formalized review process to ensure that body worn and in car camera operations footage are categorized appropriately. While department supervisors perform a monthly audit for two random body worn camera operations footages, categorization is not clearly defined in the department's general orders and could impact the accuracy of categorization. In addition, the random audit performed does not cover the review of in car camera operations footage. General Order 332.03 states that "Supervisors, when reviewing video should look for training opportunities to enhance personnel performance. In addition, any video believed to benefit recruit and/or in-service training should be forwarded through the chain of command to the police academy. Minor infractions of policy or procedure found during review of video, not related to the operation of the body worn camera, will be handled as a training issue and supervisors should use the opportunity to counsel with employees to ensure no future violations occur."

We performed testing of body worn camera and in car camera operations footage and could not verify that 10 samples were appropriately categorized due to the lack of clearly defined categories in the general orders. Two of the 35 body worn camera operations samples contained conflicting categories such as "Blue Team Search/No Arrest and Arrest". Eight of the 35 body worn camera operations samples were categorized by the system, but not retroactively updated/reviewed by the uploader. As a result, inconsistent and conflicting categorization of footage of in car camera operations increase the following risks:

- Inaccurate retention period due to conflicting categories
- Loss of footage, if assigned a category with a shorter retention period
- Lack of formality and inconsistency in the performance of uploading footage

Impact 01: Lack of defined categorization of footage can lead to potential loss of footage due to inaccurate retention periods.

Proposed Corrective Action 01 (Recommendation A.1): We recommend that Dallas Police Department Management strengthen requirements of supervisor review to ensure officers are following proper categorization, retention, and use of body worn camera operations. This includes increasing the volume of monthly body worn camera operations audits.

(Recommendation A.2) Additionally, we recommend the City to revise General Order 332.03 Body Worn Camera Operations to include detailed descriptions of each category and required judgmental tagging of footage by each officer.

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Observation 02 – HIGH – Timeliness of Open Records Requests: The City's Open Records Requests for body worn camera operations and in car camera operations footage are not being addressed timely due to a lack of resources. Through interviews with the City's Open Records Request team, as part of the City Secretary's Office, we identified resource limitations resulting in untimely processing of Open Records Requests. The Texas Attorney General – Public Information Act Handbook 2022 states that open records requests should be addressed within ten business days and are required to communicate with the requestor through writing if the request cannot be fulfilled within ten business days and must provide an estimated date of completion.

Recently, the City Auditor's Office performed a survey to peer organizations about the performance of Open Records Requests, but are still awaiting the full results. However, initial results of the City's Open Records Request survey with peer cities identified that a dedicated open records request team ranges from 7-10 employees. Additionally, other Texas cities complete body worn camera operations and in car camera operations related open records requests on an average from 5 - 20 business days, while the City of Dallas is close to four (4) months.

Resource and timeliness limitations of addressing open records requests could increase the following risks:

- Increased risk of data loss and violations of state/federal laws/regulations
- Unique circumstances that require a fast turnaround for footage/information are not handled/addressed in a consistent manner
- Failure to implement a new system of key performance indicators for Open Record Requests could lead to an inefficient use of time and resources
- Failure to implement digitalization for historical records could lead to an inefficient use of time and resources

This issue of timeliness of fulfilling requests was initially identified in the February 2020 Audit of the City's Open Records Request Process - Dallas Police Department.

Responsibility for Dallas Police Department video open records requests was transferred from Dallas Police Department to the City Secretary's Office in August 2023. This occurred after both the audit scope period and the completion of audit fieldwork.

Impact 02: Untimely open records requests could increase distrust among citizens and increase loss of data, if a request contains footage with an expired retention period.

Proposed Corrective Action 02 (Recommendation B.1): We recommend the City consider additional resources who are responsible for the oversight and monitoring of Open Records Requests processed by designated Open Records Request coordinators.

(Recommendation B.2) Additionally, implement an operation to monitor Open Records Requests on a sample basis for timeliness. Attributes that should be monitored include:

- Consistent application of Open Records Request responsiveness and redaction of exempt information prior to release
- Timeliness of processing

City of Dallas

Internal Audit Report of Body Worn and In Car Camera Operations of the Dallas Police Department February 2024

- Effective use of GovQA features
- Use of cost recovery for voluminous requests
- Frequently requested records that can easily be made public on the City's website.

Observation 03 – MODERATE – Body Worn and In Car Camera Operations Refresher Trainings: Although incoming police cadets are required to attend the City's police training for initial use of body worn camera operations and in car camera operations, the City does not provide formal and periodic or refresher body worn camera operations and in car camera operations training sessions at established intervals. General Order 332.03 states that "Additional training shall be provided at periodic intervals to ensure the continued effective use of the equipment and incorporate changes, updates, or other revisions in policies and equipment." While the City provides updates to general orders and trainings through a Bulletin Board, acknowledgement of changes by affected employees are not documented nor tracked. This will increase the following risks:

- Police Officers are not in alignment with the City's policies and/or state/federal regulations/laws
- Inconsistencies in body worn and in car camera operations best practices (visual or audio intake, inappropriate positioning of camera operations equipment, or late activation and/or premature ending of footage)

Additionally, Open Records Request required trainings are not reviewed periodically for relevance and improvement. This hinders that changes to laws/regulations and/or best practice guidelines are identified and implemented to ensure team members are adequately informed.

Impact 03: A lack of periodic training may result in personnel not performing their duties and utilizing camera operations in line with City requirements and expectations, which can result in increased likelihood of non-compliance with City's policies, procedures, and state/federal regulations and laws.

Proposed Corrective Action 03 (Recommendation C.1): We recommend that Dallas Police Department management strengthen refresher/periodic training requirements at established intervals for in car camera operations and body worn camera operations to ensure officers are in alignment with the Department's polices and regulations. This includes revising General Order 332.03 Body Worn Camera Operations to include requirements for:

- (1) Periodic trainings regarding updates to general orders and policies
- (2) The proper start and stoppage of body worn camera operations recordings
- (3) Guidelines for monitoring corrective action when internal review identifies that officers do not use cameras properly

(Recommendation C.2) Additionally, we recommend the City Secretary's Office, in coordination with the Dallas Police Open Records Unit, develop targeted training for Open Records Request process attributes that are commonly misunderstood or have frequent noncompliance or inconsistencies.

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Observation 04 – MODERATE – Conclusion Announcement at Contact End: The Dallas Police Department's General Order #332.04 requires all body worn camera operations officers to announce the conclusion of footage before deactivating their body worn camera operations recording while ending a contact. While this is communicated to current and incoming police officers, the action is inconsistently performed.

We performed testing of 35 body worn camera operation recordings and identified that 14 of the 35 samples did not contain a conclusion announcement. In addition, in car camera operations footage are not required to contain a conclusion announcement. As a result, inconsistent conclusion of footage statement increases the risk of negative reputational impact among the media, community, and citizens.

Impact 04: Lack of utilizing proper "conclusion announcement" to end the contact and stoppage of body worn camera operations footage can lead to skepticism among the public related to the completeness of the footage.

Proposed Corrective Action 04 (Recommendation D.1): We recommend that Dallas Police Department Management strengthen requirements of Supervisory review to monitor policy performance consistency for the applicable general orders. This includes emphasizing the guidelines of General Order 332.03 for initiating timely corrective action taken because of the internal review of body worn camera operations footage when officers do not use camera operations properly.

Phase 2 Observations

Observation 05 – MODERATE – Body Worn Camera Operations Charter – Definition of Current Body Worn Camera Operations Capabilities: While General Orders 332 (Body Worn Camera Operations) and 328 (Digital Video Recorder) have been documented to assist in providing a high-level overview of the requirements for operating the body worn camera operations, there is not a defined body worn camera operations and in car camera operations security program/charter that documents the scope of the system to serve as an anchoring point for standard operating procedures and required security practices related to the body worn camera operations system.

Note: The General Orders for Body Worn Camera Operations (332) and Digital Video Recorder Program (328), were last revised on August 22, 2022, and October 18, 2021, respectively.

Note: The updated Administrative Directive 6-19 (Camera Operations Governance) document was issued as draft after the fieldwork phase of the audit.

Impact 05: Unclear operational and security requirements based on role for all stakeholders may lead to a gap in capabilities related to relevant competencies within the body worn camera operations program.

Further, without the documentation of security standards related to day to day operations and procedures, Information & Technology Services and Dallas Police Department may assume the responsibility of certain tasks fall within the other department, increasing the likelihood that critical practices for securing the body worn camera operations system and evidence are inconsistently performed.

Lastly, turnover related to management of the body worn camera operations program (e.g., officer promotions) may result in 'institutional knowledge' becoming lost if security standards, technical/security related responsibilities, and operations are not defined/documented.

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Proposed Corrective Action 05 (Recommendation E.1): We recommend that management create and maintain a document (e.g., program, charter, matrix, etc.) to capture all relevant capabilities, security requirements, responsibilities (City and third-party), technology components, types of assets (e.g., body worn camera operations hardware, software, mobile applications, connections, storage locations, etc.) related to the body worn camera operations and in car camera operations. This can serve as a basis for demonstrating the current state of the program to all key stakeholders and to ensure all components are considered in current and future discussions related to the overall strategy and maturation of the body worn camera operations / in car camera operations.

Additionally, management should document data flows to demonstrate all locations where evidence related to the body worn camera operations program is processed, transmitted, and stored.

Management should formalize a central repository for body worn camera operations in car camera operations governance artifacts and supplemental documentation, such as policies and procedures, to ensure all personnel can access documents timely and are knowledgeable of where supporting documentation exists.

Observation 06 – MODERATE – User Role & Access Review (Evidence.com): There was no defined process for conducting and documenting the results of a periodic user access review for user roles with elevated permissions within Evidence.com. Within Evidence.com there are various types of user roles with extensive permissions, including roles created by Dallas Police Department, that have variations of permissions that allow for the editing of system configurations, evidence, and cases.

Additionally, there was no defined process to periodically review retention schedules configured within Evidence.com. The "Admin body worn camera operations performance" group has permission to update retention schedules within Evidence.com. Any changes are automatically approved within and the system does not notify the administrator teams and/or supervisors of any changes.

Note: Per inquiry with the Dallas Police Department, user access reviews are performed on an ad hoc basis with the goal of conducting on a quarterly recurrence.

Impact 06: User access reviews are required to ensure that privileges are not erroneously assigned to users without business justification and proper authorization to access and/or edit resources. Users granted with additional permissions may accidentally apply changes (e.g., human error) to the system that impact the security of the data within.

Further, a lack of review of system configuration changes, including evidence retention schedules, may result in misalignment with evidence mismanagement.

Proposed Corrective Action 06 (Recommendation F.1): We recommend that management define and detail the process for periodic (e.g., quarterly) Evidence.com user access reviews, prioritizing reviews for roles that have elevated permissions to make edits to system configurations as well as to evidence and cases within the system. This operation should consist of reviewing permissions of each role for appropriateness as well as each role membership. The defined review operation should consider the following:

- The steps which should be taken to perform the access review
- The roles that should be reviewed (the roles with the access to edit)

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- What attributes should be reviewed (e.g., employment status, title, roles and responsibilities, appropriateness of access, etc.)
- An approved method for documenting what changes were made as part of the review as well as the remediation actions taken because of the access review
- An approval process by stakeholders outside the body worn camera operations that performs the review

(Recommendation F.2) Management should also periodically conduct and document a review of the retention schedules within Evidence.com to ensure all changes were approved and evidence tagged to specific categories remain in compliance with relative state and federal regulation as well as City policy. Logs for unapproved changes should be investigated and results documented as part of the review to ensure operation updates related to Evidence.com administration are not required.

Observation 07 – LOW – Continuous Security Configuration Monitoring: There were no City defined security configuration baselines, benchmarks, or system hardening operations (defined outside of Axon product guidance) that supported the secure management of the body worn camera operations devices. Further, there were no defined operations in place to continuously monitor and periodically demonstrate the security configurations, such as encryption, retention, authentication, etc. present within the body worn camera operations (e.g., Axon Body 3) to stakeholders outside of the body worn camera operations team.

Impact 07: Body worn camera operations may be assigned with insecure-by-default configurations and/or changes from approved configurations over time without notification to body worn camera operations administrators leaving the devices more vulnerable to compromise or mishandling.

Proposed Corrective Action 07 (Recommendation G.1): We recommend that the body worn camera operations team should define the approved security baseline configurations and related setup steps within operations documents to codify the requirements for securing newly purchased and re-assigned camera within City acknowledged documentation (outside of vendor product documentation online).

(Recommendation G.2) Additionally, management should implement a process for periodically monitoring camera operations for potential "configuration drift" from secure baselines and ensure there are methods for exporting configurations based on camera operation type to demonstrate audit artifacts for continuous monitoring to leadership and other body worn camera operations key stakeholders.

Observation 08 – LOW – Vendor Contract Testing and/or Review: While there is an established vendor management operation being applied to new third-party / vendor contracts, the original Evidence.com contract did not go through a documented security evaluation as it was adopted prior to the new vetting process. The City did not demonstrate documentation to support that the previous contract was reviewed to ensure the vendor's practices were aligned with the City's security requirements and standards and that the City was receiving all services from the vendor as expected.

Note: Per inquiry with Information & Technology Services, the Axon contract renewal is scheduled to go through the new operation to document security considerations (e.g., access controls, segmentation,

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data protection, backup & recovery, etc.) and obtain and review relevant trust and compliance reports from relevant vendors.

Impact 08: The absence of an operation to formally risk rate and assess third-party vendors for security related risk may lead to issues relevant to the vendor's service going unidentified.

Further, by not defining key security responsibilities, requirements, and a service level agreement with the vendor as they relate to the City's body worn camera operations program, gaps in the performance of key practices may go undetected.

Additionally, in the event responsibilities from the vendor are suddenly modified or not achieved (e.g., availability of evidence on evidence.com), access to, reviewing, and sending evidence capabilities may be interrupted and it may result in the inability for members of the Dallas Police Department to successfully perform their duties.

Proposed Corrective Action 08 (Recommendation H.1): We recommend that management define the vendor management process enhancements as part of the documented vendor management program, i.e., define procedures related to conducting the updated trust and risk assessment operation for onboarding and periodically re-assessing vendors of notable risk/impact to the City (e.g., Axon).

(Recommendation H.2) Additionally, key functions that are performed by vendors, such as Axon, should be documented outside of the contract language and mapped to the body worn camera operations program to ensure the division of responsibilities is clearly understood by all key stakeholders (i.e., the Dallas Police Department, Information & Technology Services, and third-parties).

Observation 09 – LOW – Officer Mobile Device Usage Requirements: There were no defined requirements related to the approved usage of mobile devices and the Mobile Axon Capture application (app) within the body worn camera operations General Orders (i.e., General Order 332). Axon Capture is a mobile app utilized by officers in the field to take photos, record footage and audio, tag with location data and necessary metadata, and upload evidence to Evidence.com.

Note: The body worn camera operations training includes components related to the usage of the Axon Capture mobile app and related prohibited activities, including storing evidence on the native photos app on mobile devices and only permitting the use of the mobile app on City distributed devices.

Additionally, at the time of the audit, the City did not have the capability to systematically restrict the usage of the app to managed mobile devices only and the app was accessible from officer-owned devices that were not centrally managed by the City to assess for security configurations.

Impact 09: A lack of policy surrounding approved mobile device practices may result in the misuse of City resources and the increased likelihood that evidence is stored in unapproved locations and potentially exposed to unauthorized access.

Additionally, without a mechanism to centrally manage mobile devices, the likelihood of these devices becoming non-compliant with the City's security policies and standards is increased.

Proposed Corrective Action 09 (Recommendation I.1): We recommend that management document expectations and requirements for usage of mobile devices within policy that is

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acknowledged by applicable users to formally define expectations and prohibited activities to manage risk related to evidence management.

(Recommendation I.2) Additionally, management should continue to evaluate solutions for systematically restricting which devices may log into the Axon Capture mobile app to ensure the devices are managed by a Mobile Device Management solution and can be monitored, secured, updated, and maintain alignment with the City's security policies.

Observation 10 – LOW – Maintenance of the Body Worn Camera Operations Asset Inventory: The body worn camera hardware asset inventory provided by the body worn camera operations team on April 20, 2023, demonstrated 183 of 2,251 (~8%) camera records that had missing data/attributes, including:

- 58 of 2251 records that did not have a division recorded
- 1 of 2251 records that did not have an assigned officer's first and operations last name recorded
- 154 of 2251 records that did not have an assigned officer's last training date recorded
- 4 of 2251 records that did not have an associated camera operations serial number listed

Note: Some camera operations records were missing multiple attributes.

Further, the body worn camera operations hardware asset inventory had 26 camera operations that recorded duplicated serial numbers throughout the inventory. This indicated that there were 13 camera operations where the serial number was not accurately recorded within the inventory, or the assignee was not properly tracked. The following 13 serial numbers were duplicated throughout the inventory:

X6030295T	X6030493T	x6030740T	x6032113M	X6032240F	x6032425L	X6032786L
x60A20407	x60A2266D	X60A2726B	X60A29197	x60A40318	x60A7654W	

Note: In some circumstances, the duplicated camera operations serial number was recorded for two separate officers that were on the same watch/shift, e.g., X6030493T for watch 2.

Note: Related to in car camera operations, the process for submitting requests for installing an in car camera was being updated from a Google Form request flow to formal tracking within ServiceNow. This migration will assist in alleviating potential inconsistencies in tracking and resolution of requests experienced with the current Google Forms process.

Impact 10: Inaccurate or incomplete source of record for assets (software, hardware, physical and logical, external connected resources, etc.) may lead to inconsistent application of key security controls across the body worn camera operations system.

Further, a lack of a formal periodic asset reconciliation operation may lead to an inability to efficiently identify inaccuracies in the inventory in the event other detection/tracking methods fail.

Proposed Corrective Action 10 (Recommendation J.1): We recommend that management formally define operations, including source records as well as the responsibilities and technology components, required for maintaining a complete and accurate body worn camera operations hardware inventory. Population of the inventory may include automated operations to collect and aggregate information from defined sources (e.g., API calls, scripts, etc.).

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(Recommendation J.2) Additionally, management should establish an operation for performing a periodic reconciliation to ensure that inventory attributes are reflective of the most up to date information. This operation may include comparing lists of active camera operations that have recently synced with/uploaded evidence to Evidence.com as well as information gathered from officer inquiry (to verify which camera operations they have in their possession) to compare to the current documented source of truth. Reconciliation should be performed at a frequency aligned with the frequency of potential changes to camera operations (e.g., re-assignments, repairs, etc.) and minimally on a semi-annual basis.

Emerging Risks

Emerging Risk 01 – L3 Security Requirements (Sunset Plan Documentation): The security requirements and key practices including, access controls for in car camera operations connected systems and networks (e.g., substation Wi-Fi), segmentation, logging and monitoring at substation locations, encryption on substation servers, etc. were not defined and clearly understood across departments (Information & Technology Services versus the Dallas Police Department) and lack definition around the necessary access controls (network segmentation included) and the logging and monitoring components that accompany them. The lack of design and documentation needs a short-term mitigation solution since there is 2-4 year transition period.

Note: While the L3 program is being phased out, per inquiry with the Dallas Police Department, the timing of the phased sunset plan is anticipated to expand across a 2-4 year period.

Additionally, network and architecture diagrams of the substation locations to demonstrate the critical systems associated with the L3 in car camera operations and related evidence data flows included potentially outdated information that included references to "To Be Determined" connection points to Evidence.com from substation locations. The last revision date recorded on the diagrams was August 25, 2015.

Impact 01: The lack of definition may result in inconsistent knowledge transfer and training and the reliance on the existing controls may be impacted resulting in gaps in security throughout the planned phase out of the L3 system.

Recommendation 01: Management should ensure that the minimum required security controls are in place and understood across all users and stakeholders and that the sunset plans are viewed in tandem with the existing risk profile. The controls should be periodically reviewed for critical dependencies for the portions of the evidence that is captured and transmitted through legacy methods and planned for migration to new storage channels (i.e. Evidence.com). Reviews of network architecture and diagrams should be included in this operation to ensure diagrams demonstrate any updates to the environment to assist in identifying where additional security controls may be required.

Also, management should formally document the phase out plan and include milestones and anticipated target dates across all key stakeholders to ensure the necessary security controls are considered throughout the entire operation (e.g. access controls and segmentation for substation servers after subset if used for backup).

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Emerging Risk 02 – Define Scope of Required Training Attendees: There were no policies or operations defined that require members of the body worn camera operations team to also attend related training. General Order 332 documents the requirement for "Personnel" to attend training, and Personnel is defined as users that are assigned a body worn camera.

Note 1: Body worn camera team members who have not operated an assigned camera currently or previously, could have assigned roles and responsibilities within the department or facilitate body worn camera operations trainings regardless of if they have not attended prior trainings.

Note 2: The Police Executive Research Forum (PERF) guidance for implementing a body worn camera operations program defines the following recommendation: " body worn camera operations training should be required for all agency personnel who may use or otherwise be involved with body worn camera operations ."

Impact 02: Lack of training for all personnel involved with the handling of body worn camera may result in inconsistent usage of the system and related resources.

Recommendation 02: Management should consider updating policy documentation to include requirements for all applicable stakeholders to attend periodic training to ensure all personnel understand their responsibilities for upholding the security of the system.

Emerging Risk 03 – Office of Community Oversight Communication and Collaboration: Through interviews with members of the Community Police Oversight Board (Board) and Office of Community Police Oversight (Office), we identified concerns in communication and collaboration between the Board and Dallas Police Department regarding timely access to view footage from high risk/emotional scenes before it is uploaded to Evidence.com. Currently, policy and practice does not allow the Community Police Oversight Board and Office to view collected footage at the scene of an incident and must wait until it is uploaded to Evidence.com, which is required under City Ordinance to occur within 72 hours of the incident. The delay in viewing of footage during certain instances concerns the Board due to being unable to effectively answer questions from concerned citizens in an accurate or timely manner. However, the 72 hour delay ensures that all pertinent footage is obtained, uploaded, and reviewed by investigators and police administrators to verify all information/footage is collected and available for review. The timely view of footage, ability to access and navigate the current evidence.com access, and continued open dialogue between the Board, Office, and Dallas Police Department should be considered for future relationship building efforts.

Impact 03: Concerns related to the communication and collaboration between the Board, Office, and Dallas Police Department can lead to reputational impact among the media, community, and citizens.

Proposed Corrective Action 03: We recommend that the Community Police Oversight Board (Board), the Office of Community Police Oversight (Office), and the Dallas Police Department continue to strengthen relations through enhanced communications and collaboration. This includes considerations for possible revisions to policies, practices, and procedures for the sharing and communicating of information, data, and footage.

Appendices

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Appendix A: Risk Ratings

The appendix defines the approach and classifications utilized by Weaver to assess the residual risk of the observations identified. Residual risk is the risk derived from the environment after considering the mitigating effect of internal controls. The observations have been assessed from a residual risk level utilizing the following risk management classification system.

High

High risk observations have qualitative factors that include, but are not limited to:

- Events that threaten the City's achievement of strategic objectives or continued existence
- Impact of the observation could be felt outside of the City or beyond a single function or department
- Potential material impact to operations or the City's finances
- Remediation requires significant involvement from senior City management

Moderate

Moderate risk observations have qualitative factors that include, but are not limited to:

- Events that could threaten financial or operational objectives of the City
- Impact could be felt outside of the City or across more than one function of the City
- Noticeable and possibly material impact to the operations or finances of the City
- Remediation efforts that will require the direct involvement of functional leader(s)
- May require senior City management to be updated

Low

Low risk observations have qualitative factors that include, but are not limited to:

- Events that do not directly threaten the City's strategic priorities
- Impact is limited to a single function within the City
- Minimal financial or operational impact to the City
- Require functional leader(s) to be kept updated, or have other controls that help to mitigate the related risk

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Appendix B: Summary of Audit Procedures

Overall Testing Approach

- Conduct interviews and walkthroughs of the key operations and scope areas identified
- Compare identified controls to expected controls
- Review samples, police transactions, and supporting documentation, as necessary
- Perform effectiveness and substantive testing

Phase 1 [Operational]

- Review current body worn camera operations policies and procedures, directives, and general orders to ensure existing footage handling and protection operations align with state and local government requirements and meet best practices for law enforcement agencies.
- Conduct interviews with key personnel within the organization and examine existing documentation to understand the current practices and operations for managing and administering body worn camera operations and in car camera operations.
- Identify and determine if internal controls are designed and implemented to ensure the effective management, administration, and compliance of body worn camera operations and in car camera operations performed by the Dallas Police Department:

Process Areas	Control Coverage
Issuance of Equipment	11
Policy, Operations and Training	7
Tagging, Retention and Storage	11
Review and Evaluation Cycle	1
Open Record Requests	12
Community Police Oversight Office Coordination	5
Total Controls	47

- Execute testing over body worn camera operations and in car camera internal controls to ensure that controls over the selected critical processes are operating as designed, including proper oversight, execution, consistency, and compliance with defined policy, operation, directives, and general orders.
 - We reviewed a sample of 35 body worn camera operations footage to verify that all body worn camera operations footage is in accordance with the City's policies, procedures, and general orders. Our testing procedures include verifying that the recording was uploaded timely, was categorized appropriately, contained clear footage and audio, and that the incident was appropriately concluded.

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- We reviewed a sample of 29 in car camera operations footage to verify that all in car camera operations footage is in accordance with the City's policies, operations, and general orders. Our testing procedures include verifying that the recording was uploaded timely, was categorized appropriately, contained clear footage and audio, and that the incident was appropriately concluded.

Phase 2 [Information Security]

- Review current body worn camera operations policies and operations to ensure existing footage handling and protection operations align with Criminal Justice Information Services (CJIS) Security Policy requirements and Police Executive Research Forum (PERF) recommendations related to implementing body worn camera operations.
- Conduct interviews with key personnel within the organization and examine existing documentation to understand current footage protection and handling operations for body worn camera operations footage.
- Evaluate security controls in place for protecting body worn camera operations footage in transit and storage against CJIS Security Policy requirements and PERF recommendations.
- Inspect system configurations related to evidence retention to ensure retention periods are commensurate with the City's risk profile and they align to City operations/requirements.
- Assess the privileged user access management controls in place to protect evidence including operations for periodically reviewing administrator access to locations where evidence exists related to the body worn camera operations system.
- Inspect multi-factor authentication configurations in place to protect privileged access to evidence locations.
- Inspect network architectural and dataflow diagrams and inquire IT and Security personnel to verify all locations that evidence data is processed, stored, or transmitted, including potential connections into system components, e.g., APIs.
- Inspect body worn camera operations asset inventories to verify body worn camera operations system components are formally tracked to ensure there is a basis for where security controls need to be applied for coverage across the system as a whole.
- Compare body worn camera operations footage data classification operations against the Dallas Police Department policies and PERF recommendations.
- Evaluate body worn camera operations footage storage locations to ensure third party facilities and providers have been vetted for compliance with CJIS requirements.
- Evaluate IT-related vendor management operations to ensure there are mechanisms to track compliance with the City's security requirements as it relates to the body worn camera operations system components and controls.
- Review the body worn camera operations and data storage technology in use to ensure they are capable of meeting CJIS requirements and PERF recommendations for footage protection and handling.
- Identify unacceptable risk exposure due to control design inadequacy or opportunities to strengthen the effectiveness of existing body worn camera operations footage protection and handling operations.

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Appendix C: Documentation Inspected

Phase 1 - Operational

- Policies, Operations, and Standards
 - General Orders ("328 Digital Video Recorder Program.pdf", "332 Body Worn Cameras Operations.pdf")
 - Dallas Police Department Trainings ("Working PowerPoint BWC 3 2-3.ppt")
 - City of Dallas Retention Schedule
 - City of Dallas Public Information Request Survey (_Peer City Survey for the Dallas Police Department Body Worn Camera Operations and In Car Camera Operations Audit (1-4).xlsx")

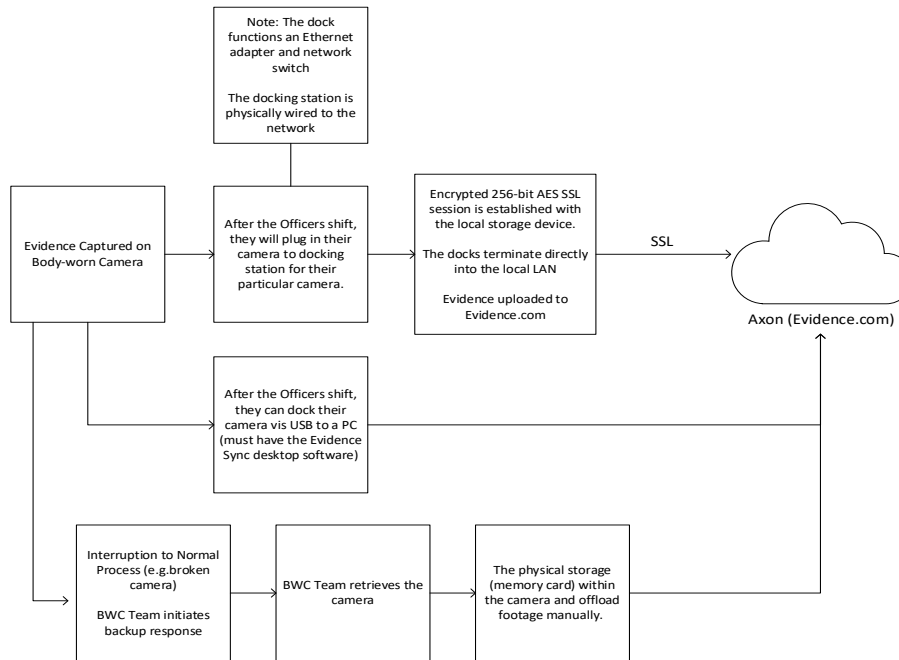
Phase 2 – IT Related Operations

- Policies, Operations, and Standards
 - Administrative Directives ("AD2-02-2017.pdf", "AD2-24 (Administrative Directive 2-24).pdf", "AD2-28-2016.pdf", "AD2-29_2002.pdf", "AD2-30_2004.pdf", "AD2-34_1_2004.pdf", "Ad4-09_2015.pdf", "EBS_Interim_AD_2-4_2018.pdf")
 - General Orders ("328 Digital Video Recorder Program.pdf", "332 Body Worn Camera Operations.pdf")
 - Information Security Standard ("EnterpriseSecurityStandard_10-01-2020.pdf")
- Implementation Guides and Standards
 - Axon Contractual Agreements ("20-0625.pdf", "22-1784-Axon Enterprises, Inc. FINAL-Hilson, Melony Ops (1).pdf", "Resolution from Axon Contract Approval Item_12-14-2022.pdf")
 - L3 Contractual Agreements ("11-2322.pdf", "13-6557.pdf", "15-7205.pdf", "16-6250.pdf", "16-6842.pdf", "Email Request for L3 Contract and Related Administrative Actions_03-22-2023.pdf")
- Network and Dataflow Diagrams
 - Body Worn Camera Operations Dataflow ("Body Worn Camera Operations rev1.pdf")

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- Based on inquiry and documentation examination (e.g., Axon contract and help documentation) the overall data flow related to the Axon body worn camera operations system at the time of the audit is represented below for reference:



- Hardware Asset Inventory
 - Body Worn Camera Operations Inventory ("Body worn camera operations Inventory.xlsx")
- IT Vendor Inventory
 - Systems and Business Operations ("Dallas Police 3.22.23 710 – DRAFT.pdf")
- Administrator Users
 - User Permissions ("Admin Body Worn Camera Operations Performance Permissions.jpeg", "Chief's Office Permissions.jpeg", "City Attorney - Body Worn Camera Operations Permissions.jpeg", "City Safety Team Permissions.jpeg", "Drone Permissions.jpeg", "Fleet User Permissions.jpeg", "Fusion Investigator Sworn Permissions.jpeg", "Helicopter Pilots Permissions.jpeg", "IAD Permissions.jpeg", "Investigator - Special Assignment (Limited Time Duration) Permissions.jpeg", "Investigator Pro Permissions.jpeg", "IP Addresses.pdf", "Legal DME Team Permissions.jpeg", "Officer - Body Worn Camera Operations Permissions.jpeg", "Officer Body Worn Camera Operations Pro Permissions.jpeg", "Open Records - Body Worn Camera Operations Permissions.jpeg", "Photo Lineup Civilian Permissions.jpeg", "Radio Shop Permissions.jpeg", "Supervisor Light Permissions.jpeg", "Supervisor Performance Permissions.jpeg", "Swat Doctor - Reserve Permissions.jpeg", "Taser Officer Body Worn Camera Operations Pro Permissions.jpeg", "Video Coordinators - Body Worn camera Operations Permissions.jpeg")
 - API Settings ("API Settings.pdf")
 - Body Worn Camera Operations Standard Operating Procedure ("Body Worn Camera Operations SOP.pdf")

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- Roles ("Existing Roles.pdf")
- MFA Configurations ("MFA Settings.jpeg")
- Privileged Users ("Privileged Admin Users.pdf")
- Administrator Users ("RE List of Administrators.msg")
- Cybersecurity Risk Assessment
 - Risk Assessment Template ("Quick-Template-NIST-SP800-171R2-Security-Assurance-Document.docx")
- Training Materials
 - Training Class Dates ("Body Worn Camera Operations Training Class Dates, Oct 2020 to Oct 2022.docx")
 - Training Presentation ("Working PowerPoint Body 3 2-3.pptx")
- System, Security, and Data Protection Configurations
 - Camera Operations Settings ("Axon Body 2 & Flex 2 Camera Operations Settings.jpeg", "Axon Body 3 Camera Operations Settings.jpeg", "Axon Capture Settings.jpeg", "Axon Fleet 3 Settings.jpeg").
- Footage Retention
 - 30 Day Warning ("30 Day Warning Report.pdf")
 - Retention Schedule ("Retention Schedules.pdf")
- Body Worn Camera Operations Evidence.com Activity Logs
 - December Activity Logs ("12-18-22 Arrest Audit Trail.pdf", "12-18-22 Arrest Query.jpeg", "12-18-22 Blue Team Search – No Arrest Audit Trail.pdf", "12-18-22 Blue Team Search – No Arrest Query.jpeg", "12-18-22 Call for Service – Incident Audit Trail.pdf", "12-18-22 Call for Service-Incident Query.jpeg", "12-18-22 Citation Audit Trail.pdf", "12-18-22 Citation Query.jpeg", "12-18-22 Critical incident Audit Trail.pdf", "12-18-22 Critical Incident Query.jpeg", "12-18-22 Family Violence Photographs Audit Trail.pdf", "12-18-22 Family Violence Photographs Query.jpeg", "12-18-22 Investigative evidence Audit Trail.pdf", "12-18-22 Investigative Evidence Query.jpeg", "12-18-22 Pedestrian Stop Query.jpeg", "12-18-22 Pedestrian Stop Query.jpeg", "12-18-22 Pending Review Audit Trail.pdf", "12-18-22 Pending Review Query.jpeg", "12-18-22 Restricted Access Query.jpeg", "12-18-22 Traffic Stop Audit Trail.pdf", "12-18-22 Traffic Stop Query.jpeg", "12-18-22 Uncategorized Audit Trail.pdf", "12-18-22 Uncategorized Query.jpeg")

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- January Activity Logs ("1-22-23 Arrest Audit Trail.pdf", "1-22-23 Arrest Query.jpeg", "1-22-23 Blue Team Search – No Arrest Audit Trail.pdf", "1-22-23 Blue Team Search – No Arrest Query.jpeg", "1-22-23 Call for Service – Incident Audit Trail.pdf", "1-22-23 Call for Service-Incident Query.jpeg", "1-22-23 Citation Audit Trail.pdf", "1-22-23 Citation Query.jpeg", "1-22-23 Critical incident Audit Trail.pdf", "1-22-23 Critical Incident Query.jpeg", "1-22-23 Family Violence Photographs Audit Trail.pdf", "1-22-23 Family Violence Photographs Query.jpeg", "1-22-23 Investigative evidence Audit Trail.pdf", "1-22-23 Investigative Evidence Query.jpeg", "1-22-23 Pedestrian Stop Query.jpeg", "1-22-23 Pedestrian Stop Query.jpeg", "1-22-23 Pending Review Audit Trail.pdf", "1-22-23 Pending Review Query.jpeg", "1-22-23 Restricted Access Query.jpeg", "1-22-23 Traffic Stop Audit Trail.pdf", "1-22-23 Traffic Stop Query.jpeg", "1-22-23 Uncategorized Audit Trail.pdf", "1-22-23 Uncategorized Query.jpeg")

Appendix B: City Survey

The Office of the City Auditor conducted a survey of Dallas Police Department and 11 other large police departments in July and August 2023 to obtain comparative information on body worn and in car camera operations using 2022 calendar year data.

Dallas and four other cities participated for a 42 percent response rate, including Columbus, Ohio, and Houston, El Paso, and Fort Worth in Texas. Responses were not received from Austin, Jacksonville, Philadelphia, Phoenix, San Antonio, San Diego, and San Jose.

The responding large cities are using both body worn and in car cameras. As Dallas was second in population by a significant margin among cities surveyed, Dallas ranked second in most areas analyzed. Controlling for population, Dallas also ranked second in body cameras per officer and videos per officer per year. Dallas ranked first in number of in car cameras and requests for videos, third in combined cameras per officer, and fourth in the time needed to respond to requests for videos.

Exhibit 1:

Large City Camera Operations by Cameras Per Officer

City	2020 Population	Officers	Body Worn Cameras	Body Worn Cameras Per Officer	In Car Cameras	Combined Cameras Per Officer
Dallas	1,304,379	3,077	2,365	.77	625	.97
El Paso	678,815	1,128	34	.03	405	.39
Fort Worth	918,915	1,600	1,200	.75	450	1.03
Houston	2,304,580	5,137	3,500	.68	354	.75
Columbus	905,748	1,753	1,846	1.05	460	1.32
Dallas Rank	2	2	2	2	1	3

Source: Survey responses received July and August 2023 and Census.Gov data.

Due to how their data is combined, not all cities could differentiate between types of camera videos, and report separately on the amount of in car videos and body camera videos. As a result, [Exhibit 2](#) combines the reporting for both types. However, there can be significant differences by City. For example, Dallas reported 81 percent of its videos were body worn, while El Paso reported 95 percent of its videos were in car.

Exhibit 2:

Large City Camera Operations by Number of Videos in 2022

City	Body Worn and In Car Cameras	Videos Recorded	Videos Per Day	Videos Per Officer Per Year
Dallas	2,990	2,157,238	5,910	701
El Paso	439	318,819	873	283
Fort Worth	1,650	1,425,105	3,904	891
Houston	3,854	2,416,787	6,621	470
Columbus	2,306	854,491	2341	487
Dallas Rank	2	2	2	2

Source: Survey responses received July and August 2023.

While Dallas recorded the second-most videos, the City received 4,380 more requests than all other responding cities combined. It is also taking Dallas longer to respond to those requests than the other cities surveyed. None of the surveyed cities provided data on how much money it costs to provide the requested videos.

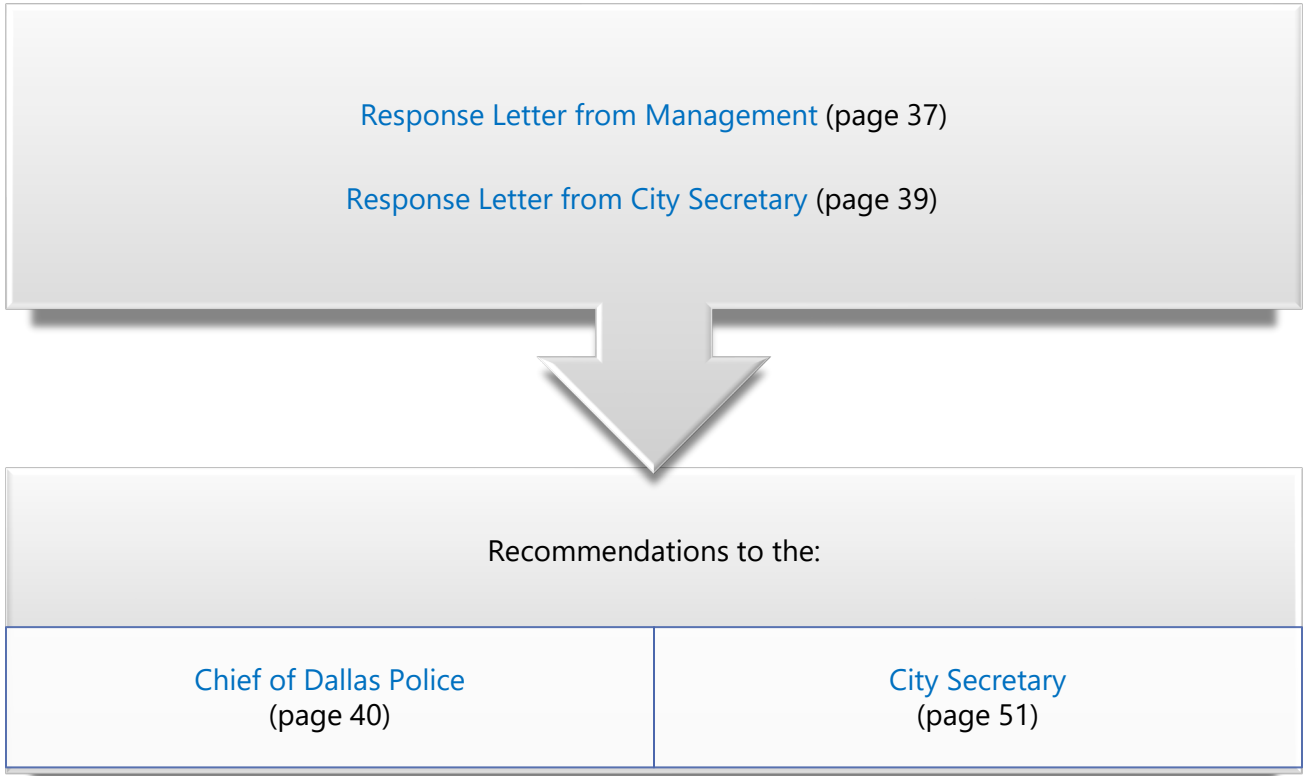
Exhibit 3:

2022 Requests for Camera Videos

City	Videos Recorded	Requests for Videos	Time to Provide Requested Videos	Cost for Providing Videos
Dallas	2,157,238	11,132	4 months	Not available
El Paso	318,819	635	20 days	Not available
Fort Worth	1,425,105	527	26 days	Not available
Houston	2,416,787	4,246	5 days	Not available
Columbus	854,491	1,344	Not available	Not available
Dallas Rank	2	1	4	N/A

Source: Survey responses received July and August 2023.

Appendix C: Management's Response



Memorandum



DATE: February 14, 2024
TO: Mark S. Swann – City Auditor
SUBJECT: Response to the Audit of Dallas Police Department Body Worn and In Car Camera Operations

This letter acknowledges the City Manager's Office received the *Audit of Dallas Police Department Body Worn and In Car Camera Operations* and submitted responses to the recommendations in consultation with the appropriate City department.

The Dallas Police Department has taken strides to define and streamline management functions and requirements to ensure body worn and in car camera operations are performing as expected. In addition, the audit noted that DPD currently generally meets the audit objectives.

DPD recognizes there are opportunities for further improvements to its existing practices.

Specifically, DPD will:

- Revise General Order 332.03 to provide detailed descriptions of the simplified categories and provide detectives clear guidance for the proper tagging and handling of evidence;
- Provide yearly refresher training for all officers;
- Strengthen existing camera audits to include verifying that officers conclude body camera recordings with proper conclusion announcements at the end of contact;
- Maintain documentation on all video asset capabilities. In addition, DPD will request ITS' assistance in helping DPD to document network security requirements, responsibilities, and technology components;
- Define and detail the process for periodic Evidence.com user access reviews, prioritizing review of roles with elevated permissions;
- Review the simplified retention procedures outlined in recommendation A.1 annually to ensure all retentions meet or exceed any legal regulations;
- Develop a process and create related documentation, instructing program administrators how to secure, configure, and deploy new or re-assigned cameras to ensure all cameras are set to baseline configurations;
- Define procedures for conducting trust and risk assessments for contracts with vendors related to the camera program;
- Document key functions performed by stakeholders outside of the contract language;
- Develop procedures that include expectations and prohibited activities for using mobile devices

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Response to the Audit of Dallas Police Department Body Worn and In Car Camera Operations
February 14, 2024
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- within the context of evidence management;
- Formally define a system of record, source documents, responsibilities, and technology components to aid in developing a complete and accurate inventory of body worn camera hardware; and
- Reconcile newly acquired, re-assigned, etc. camera equipment semi-annually between the system of record and Evidence.com.

DPD will accept the risk associated with three recommendations. By simplifying the categorization categories, DPD anticipates reducing improperly categorized videos while not adding additional demands on supervisors, thus allowing them to focus on other vital tasks. Additionally, DPD will accept the risk associated with two low-risk recommendations. Currently, DPD's tools lack the functionality to implement the recommendation. DPD will consider adding a process for identifying configuration drift when it becomes feasible. When the City renews or solicits a contract to replace the Axon Capture mobile app, DPD will request the functionality to restrict devices.

Sincerely



T.C. Broadnax
City Manager

- C: Genesis D. Gavino, Chief of Staff
- Jack Ireland, Chief Financial Officer
- Fortune, Deputy City Manager
- Eddie Garcia, Chief of Police, Dallas Police Department

Memorandum



DATE: January 31, 2024

TO: Mark S. Swann – City Auditor

SUBJECT: Response to Audit of Dallas Police Department Body Worn and In Car Camera Operations

This letter acknowledges the City Secretary's Office received the *Audit of Dallas Police Department Body Worn and In Car Camera Operations* and submitted responses to the recommendations.

We concur with your office's recommendations. The City Secretary's Office intentions now are to focus on those assessed risks and work toward implementation based on the action plan and date provided on the audit report document.

Thank you for assisting the City Secretary's Office with improving its services.

Sincerely,

Biliera Johnson
Biliera Johnson
City Secretary

C: T. C. Broadnax, City Manager
Jon Fortune, Deputy City Manager
Chief Garcia, Dallas Police Department
Miroslava Martinez, Assistant City Secretary
Paris Long, Open Records Administer

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Recommendations to the Chief of Dallas Police:

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date	
High Risk, Chief of Police					
High	We recommend the Chief of Dallas Police:				
	<p>Observation 1</p> <p>A.1: Strengthen requirements of supervisor review to ensure officers are following proper categorization, retention, and use of body worn cameras operations. This includes increasing the volume of monthly body worn camera operations audits.</p> <p>Auditor Note: While Dallas Police Department management has accepted the risk, the action plan provided will address the primary risks associated with the recommendation.</p>	Accept Risk	<p>DPD has created a compliance supervision role at each patrol division that performs video audits to check and maintain compliance while allowing a field supervision focus from other sergeants.</p> <p>DPD will reduce the risk associated with this recommendation by simplifying the categorization by moving to two categories. One category having a two year retention period (testing/training), and the other with an infinite retention period (all other uses).</p> <p>These changes will help ensure important videos are retained and properly categorized, without adding significant additional demands on supervisors, allowing them to focus on other vital tasks.</p>	N/A	N/A

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<p>Observation 1</p> <p>A.2: Revise General Order 332.03, <i>Body Worn Camera Operations</i> to include detailed descriptions of each category and required judgmental tagging of footage by each officer.</p>	Agree	<p>DPD will revise the General Orders to provide detailed descriptions of the simplified categories and provide detectives clear guidance for the proper tagging and handling of evidence.</p>	9/30/2024	9/30/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date	
Moderate Risk, Chief of Police					
Moderate	We recommend the Chief of Dallas Police:				
	<p>Observation 3</p> <p>C.1: Strengthen refresher/periodic training requirements at established intervals for in car camera operations and body worn camera operations to ensure officers are in alignment with the Department's polices and regulations. This includes revising General Order 332.03, <i>Body Worn Camera Operations</i> to include requirements for:</p> <ul style="list-style-type: none"> (1) Periodic trainings regarding updates to general orders and policies. (2) The proper start and stoppage of body worn camera operations recordings. (3) Guidelines for monitoring corrective action when internal review identifies that officers do not use cameras properly. 	Agree	<p>DPD will provide yearly refresher training for all officers. The training will include relevant updates to General Orders, body-worn camera operations, and required procedures.</p> <p>In addition, DPD will maintain periodic refresher training records in accordance with General Orders and record retention requirements.</p>	<p>6/30/2025 (Next core training cycle)</p>	<p>6/30/2027</p>

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<p>Observation 4</p> <p>D.1: Strengthen requirements of supervisory review to monitor policy performance consistency for the applicable general orders. This includes emphasizing the guidelines of General Order 332.03 for initiating timely corrective action taken because of the internal review of body worn camera operations footage when officers do not use camera operations properly.</p>	Agree	<p>DPD will strengthen existing camera audits to include verifying that officers conclude body camera recordings with proper conclusion announcements at the end of contact. Discrepancies observed will be corrected through immediate notification and additional training of officers.</p>	9/30/2024	9/30/2025
	<p>Observation 5</p> <p>E.1: Create and maintain a document to capture all relevant capabilities, security requirements, responsibilities, technology components, types of assets related to the body worn camera operations and in car camera operations. This can serve as a basis for demonstrating the current state of the program to all key stakeholders and to ensure all components are considered in current and future discussions related to the overall strategy and maturation of the body worn camera operations / in car camera operations.</p>	Agree	<p>DPD’s camera team will maintain documentation on all video asset capabilities.</p> <p>In addition, DPD will request ITS’ assistance in helping DPD to document network security requirements, responsibilities, and technology components.</p> <p>DPD is moving towards a central repository for video footage (evidence.com) by partnering with ITS to replace existing legacy in-car cameras.</p>	9/30/2024	9/30/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<p>Additionally, management should document data flows to demonstrate all locations where evidence related to the body worn camera operations program is processed, transmitted, and stored.</p> <p>Management should formalize a central repository for body worn camera operations in car camera operations governance artifacts and supplemental documentation, such as policies and procedures, to ensure all personnel can access documents timely and are knowledgeable of where supporting documentation exists.</p>				
	<p>Observation 6</p> <p>F.1: Define and detail the process for periodic (e.g., quarterly) Evidence.com user access reviews, prioritizing reviews for roles that have elevated permissions to make edits to system configurations as well as to evidence and cases within the system. This operation should consist of reviewing permissions of each role for appropriateness as well as each role membership. The defined review operation should consider the following:</p>	Agree	<p>DPD will define and detail the process for periodic Evidence.com user access reviews, prioritizing review of roles with elevated permissions to edit system configurations, evidence, and cases within the system. The review process will include the steps and procedures as recommended by the auditors.</p>	9/30/2024	9/30/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<ul style="list-style-type: none"> The steps which should be taken to perform the access review. The roles that should be reviewed (the roles with the access to edit). What attributes should be reviewed (e.g., employment status, title, roles and responsibilities, appropriateness of access, etc.). An approved method for documenting what changes were made as part of the review as well as the remediation actions taken because of the access review. An approval process by stakeholders outside the body worn camera operations that performs the review. 				
	<p>Observation 6 F.2: Periodically conduct and document a review of the retention schedules within Evidence.com to ensure all changes were approved and evidence tagged to specific</p>	<p>Agree</p>	<p>DPD’s camera team will implement and verify the simplified retention procedures outlined in recommendation A.1 and review them yearly to ensure all retentions meet or exceed any</p>	<p>9/30/2024</p>	<p>9/30/2025</p>

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<p>categories remain in compliance with relative state and federal regulation as well as City policy. Logs for unapproved changes should be investigated and results documented as part of the review to ensure operation updates related to Evidence.com administration are not required.</p>		<p>legal regulations.</p>		

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date	
Low Risk, Chief of Police					
Low	We recommend the Chief of Dallas Police:				
	Observation 7 G.1: Define the approved security baseline configurations and related setup steps within operations documents to codify the requirements for securing newly purchased and re-assigned cameras within City acknowledged documentation (outside of vendor product documentation online).	Agree	DPD’s camera team will develop a process and create related documentation, instructing program administrators how to secure, configure, and deploy new or re-assigned cameras to ensure all cameras are set to baseline configurations.	9/30/2024	9/30/2025
	Observation 7 G.2: Implement a process for periodically monitoring camera operations for potential "configuration drift" from secure baselines and ensure there are methods for exporting configurations based on camera operation type to demonstrate audit artifacts for continuous monitoring to leadership and other body worn camera operations key stakeholders.	Accept Risk	DPD accepts the risk related to this recommendation because there is no current method in the vendor’s software to export configurations based on operation type. Upon contract renewal, DPD will request ITS and the vendor to assist in determining the feasibility of adding this functionality.	N/A	N/A

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
High	<p>Observation 8</p> <p>H.1: Define the vendor management process enhancements as part of the documented vendor management program, i.e., define procedures related to conducting the updated trust and risk assessment operation for onboarding and periodically re-assessing vendors of notable risk/impact to the City.</p>	Agree	<p>DPD will request ITS' assistance in helping DPD define procedures for conducting trust and risk assessments for contracts with vendors related to the camera program.</p>	3/31/2025	9/30/2025
	<p>Observation 8</p> <p>H.2: Document key functions that are performed by vendors, such as Axon, outside of the contract language and mapped to the body worn camera operations program to ensure the division of responsibilities is clearly understood by all key stakeholders (i.e., the Dallas Police Department, Information & Technology Services, and third parties).</p>	Agree	<p>DPD will request ITS' assistance in helping DPD document key functions performed by stakeholders outside of the contract language.</p>	9/30/2024	9/30/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
High	<p>Observation 9</p> <p>I.1: Document expectations and requirements for usage of mobile devices within policy that is acknowledged by applicable users to formally define expectations and prohibited activities to manage risk related to evidence management.</p>	Agree	<p>DPD will develop procedures that include expectations and prohibited activities for using mobile devices within the context of evidence management.</p>	9/30/2024	9/30/2025
	<p>Observation 9</p> <p>I.2: Evaluate solutions for systematically restricting which devices may log into the Axon Capture mobile app to ensure the devices are managed by a Mobile Device Management solution and can be monitored, secured, updated, and maintain alignment with the City's security policies.</p>	Accept Risk	<p>DPD accepts the risk related to this recommendation because the mobile app does not have the functionality to restrict its use based on specific devices.</p> <p>Upon contract renewal, DPD will request this functionality be added by the vendor.</p>	N/A	N/A
	<p>Observation 10</p> <p>J.1: Formally define operations, including source records as well as the responsibilities and technology components, required for maintaining a complete and accurate body worn camera operations hardware inventory. Population of the inventory may include automated operations to</p>	Agree	<p>Inventory will be managed, and operations defined, within the new workforce management software and Evidence.com.</p> <p>DPD will formally define a system of record, source documents, responsibilities, and technology components to aid in developing a complete and accurate inventory of body worn camera hardware.</p>	3/31/2025	3/31/2026

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	collect and aggregate information from defined sources.				
	<p>Observation 10</p> <p>J.2: Perform a periodic reconciliation to ensure that inventory attributes are reflective of the most up to date information. This operation may include comparing lists of active cameras operations that have recently synced with/uploaded evidence to Evidence.com as well as information gathered from officer inquiry (to verify which camera operations they have in their possession) to compare to the current documented source of truth. Reconciliation should be performed at a frequency aligned with the frequency of potential changes to camera operations (e.g., re-assignments, repairs, etc.) and minimally on a semi-annual basis.</p>	Agree	<p>DPD will reconcile newly acquired, reassigned, etc. camera equipment semi-annually between the system of record and Evidence.com.</p> <p>Additionally, DPD will develop an annual process for reconciling camera equipment to ensure attributes are accurate.</p> <p>Reconciliations will verify key attributes and will include procedures to identify and correct any duplicate entries.</p>	3/31/2025	3/31/2026

Recommendations to the City Secretary:

Assessed Risk Rating	Recommendations	Concurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date	
High Risk, City Secretary					
High	We recommend the City Secretary:				
	Observation 2 B.1: Consider additional resources responsible for the oversight and monitoring of Open Records Requests processed by designated Open Records Request coordinators.	Agree	Although the function was recently transferred, we are currently working determining what additional resources are needed for effective oversight and monitoring of Open Records Requests by coordinators.	10/1/2024	2/1/2025
	Observation 2 B.2: Monitor Open Records Requests on a sample basis for timeliness. Attributes that should be monitored include: <ul style="list-style-type: none"> • Consistent application of Open Records Request responsiveness and redaction of exempt information prior to release • Timeliness of processing • Effective use of GovQA features • Use of cost recovery for 	Agree	Although the function was recently transferred, we are currently working on improving Open Records Requests processes that will provide responsiveness and timeliness of records. As well as effective use of system (GovQA) features.	10/1/2024	2/1/2025

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	voluminous requests <ul style="list-style-type: none"> Frequently requested records that can easily be made public on the City's website. 				

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
Moderate Risk, City Secretary					
Moderate	We recommend the City Secretary :				
	Observation 3 C.2: Develop targeted training for Open Records Request process attributes that are commonly misunderstood or have frequent noncompliance or inconsistencies.	Agree	The City Secretary's Office is currently in the process of developing and/or refining procedures. Training for the established Open Records Requests will be concurrent with the development and quarterly training will follow after final procedures established.	2/5/2024	8/5/2024