



CITY OF SAN ANTONIO

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March 7, 2016

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

Mayor and Council Members:

We are pleased to send you the final report of the audit of Center City Development & Operations Parking Enforcement Division. This audit began in April 2015 and concluded with an exit meeting with department management in January 2016. Management's verbatim response is included in Appendix B of the report. The Center City Development Department management and staff should be commended for their cooperation and assistance during this audit.

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

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Kevin W. Barthold".

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

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CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR



Audit of Center City Development & Operations

Parking Enforcement Division

Project No. AU15-003

March 07, 2016

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

Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of Parking Enforcement Operations. This included processes within both Center City Development & Operations and Municipal Court. The audit objective, conclusion, and recommendations follow:

Are parking enforcement operations managed in accordance with City ordinances and policies?

Overall, the Parking Enforcement Division (Parking) is effectively enforcing the City's Municipal Code regarding parking violations. However, we identified areas with control deficiencies in need of improvement for managing Parking Enforcement Operations which involves collaboration with Municipal Court.

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

Center City Development & Operations Management and Municipal Court Clerk agreed with our recommendations and have developed positive action plans. Management's verbatim response is in Appendix B on page 9.

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Background

Center City Development & Operations (CCDO) Parking Enforcement Division (Parking) is responsible for enforcing the laws pertaining to parking violations as set forth in the City of San Antonio’s Municipal Code. In Fiscal Year 2012, the division expanded their patrol area from Downtown to include parking violations in all San Antonio neighborhoods and commercial parking lots. The division is also responsible for setting up and enforcing Temporary Parking Restrictions issued and managed by the Transportation & Capital Improvements Department.

The City of San Antonio’s parking space inventory consists of 6,444 parking spaces in surface lots and multi level garages, 2,104 regular parking meters, and 60 Event Meters for events at the Alamodome. Currently, the division consists of 1 Parking Enforcement Supervisor and 18 Parking Enforcement Officers patrolling 9 zones located throughout the City.

The collection of parking citation fines is managed by Municipal Court. Municipal Court Hearing Officers are also responsible for reviewing contested citations and making rulings.

Please see the chart below for totals of citations issued by the division as well as parking fine revenue collected.

Fiscal Year	Parking	Other Agencies	Total Citations Issued	Total Citations Resolved	Revenues Collected¹
2014	56,265	18,700	74,965	47,399	\$1,935,223
2015	58,125	16,445	74,570	48,011	\$1,646,414

In FY2015, approximately 70% of citations issued by Parking were issued electronically (handhelds) while 30% were issued manually (paper ticket books).

¹ Revenues collected are recorded on a cash basis and reflect all revenues collected regardless of the agency who issued the parking citation.

Audit Scope and Methodology

The audit scope included current parking enforcement operations. In addition, citations issued in FY 2014 and FY 2015 through March 31, 2015.

To obtain an understanding of the division's processes we interviewed staff and accompanied parking enforcement officers on patrols. We utilized GIS Mapping, Graphic Information Services, to assess coverage of patrol areas. We also performed an analysis of parking citation and revenue data history.

We reviewed Chapter 19, Motor Vehicles and Traffic, of the City's municipal code as well as department policies and procedures. We reviewed the divisions towing process for compliance with the municipal code. We also reviewed Chapter 681 of the State Transportation Code, Privileged Parking, and haphazardly selected 40 citations for compliance testing with the State Code.

We verified that the division had a process in place to manage parking restrictions. In addition, we also reviewed a sample of parking restrictions for proper authorization, set up and document support.

The audit office also verified parking officers attended defensive driving courses in accordance with AD1.8, City Vehicle Use. In addition, we reviewed mileage logs for the appropriate use of City vehicles. We also reviewed officer safety conditions. We also reviewed officer's compensation to determine officers were paid accurately.

Finally, we selected a random sample of 40 dismissed cases and reviewed citations for proper evidence and support. In addition, we reviewed a random sample of 20 voided citations for proper authorization and support.

We relied on computer-processed data in the Incode and Brazos systems to validate parking citation data. The parking enforcement division utilizes the Brazos system to issue and manage their electronic citations. Municipal Court utilizes Incode as its operations system and only records parking revenue in SAP. Our reliance on Incode and SAP was based on performing direct tests on the data rather than evaluating the system's general and application controls. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

The audit office did test general and application controls of the Brazos system. Our direct testing included confirming that the Brazos system accurately calculated fine amounts and appearance dates. The audit office also validated that parking citation data for one month was completely transferred from the Brazos system to the Incode system. In addition, we verified that citation writer

data for one day accurately transferred to the Brazos system. The audit office also tested citation writers for general login and access controls.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our results and conclusions based on our audit objectives.

Audit Results and Recommendations

A. Multiple Citations

Parking is not enforcing additional measures for vehicles with multiple unresolved parking citations. The City's Municipal Code states a vehicle may be impounded² if an owner has committed 3 or more offenses in a calendar year.

In 2014, there were 1,462 vehicles with 3 or more parking citations that were not impounded. Of these vehicles, 837 had unpaid amounts totaling approximately \$119,000.

When an officer begins to enter a citation into their handhelds, they should be alerted if the violator has been issued 3 or more citations. However, the alert notification is not functioning as intended. Parking has communicated the malfunction to Municipal Court on several occasions. Municipal Court is the contract manager of the system and is responsible for vendor communications. This has been an issue for two years and attempts by the vendor to correct the malfunction have been unsuccessful.

As a result, Parking has not impounded habitual violator's vehicles in accordance with City code. Enforcement of this parking code can potentially reduce the number of habitual violators, increasing the safety of the City's roadways.

Recommendation

The Municipal Court Clerk should ensure the alert function within the application software is corrected and functioning as intended.

B. Officer Safety

Opportunities to improve the safety environment of officers working conditions were identified. Parking does not have an adequate process in place to report and track instances when officers experience potential threatening situations. Only incidents in which an officer is physically injured or is involved in a vehicle accident are reported.

When interviewed, parking enforcement officers stated they were concerned with their safety while on patrol. Most officers ride alone and do not carry city issued safety equipment. In addition, radios used by officers do not work in all areas of the City. Patrol vehicles used are not equipped with patrol safety lights. These

² Impounding can be accomplished through towing or booting the vehicle.

conditions, in addition to the inherent nature of issuing parking citations, may expose officers to risks which can be mitigated.

Recommendation

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

C. Lack of Reconciliations

Reconciliations of manually issued paper citations to citations entered into the Municipal Court Incode system are not performed. The reconciliations for electronically issued citations are partially completed.

Parking does not retain a record of paper citations issued and delivered to Municipal Court for processing into the Incode system. As a result, audit was unable to determine if paper citations issued were accounted for in Incode.

For electronic citations, the first data transfer occurs from the citation writers to the Brazos system, and the second transfer point occurs from the Brazos system to Municipal Court's Incode system.

A reconciliation process is not in place to ensure daily records transfers from the citation writers to the Brazos system are complete. The audit office was able to confirm that one day worth of citation data accurately transferred from the citation writers to the Brazos system. For the second transfer, an automated reconciliation is in place to ensure data transfers from the Brazos system to Municipal Court's Incode system are complete.

Reconciliations of citations issued ensure citations are entered and accounted for in the Incode System.

Recommendation

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

D. Inconsistent Evidence & Support

Parking is not consistently retaining appropriate evidence and document support of violations. The audit office reviewed 40 citations dismissed by Municipal Court

for evidence and support. Of the 40 dismissed citations, 7 citations did not include a photo of the violation and another 8 citations did not accurately identify the violation.

According to the Parking Enforcement Standards Manual, officers shall ensure enough information is captured on the citation or associated notes so officers will be familiar with the violation should it be contested in court. However, the Standards Manual does not give direction on how to document evidence for the parking citation categories. Parking relies on peer to peer training to educate officers on how to gather and document evidence. In addition, there is a lack of management oversight to ensure appropriate evidence is obtained by officers.

Consistent physical evidence that clearly identifies the violator's vehicle and type of violation decreases the likelihood of citations being dismissed.

Recommendation

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

E. Handicap Parking

Parking is not notifying and destroying confiscated handicap placards in accordance to the State Transportation Code.³ In addition, the Parking division does not have a process in place to identify and track confiscated handicap placards.

The code states that all confiscated placards shall be destroyed and reported to the Texas Department of Motor Vehicles no later than the fifth day after the date of seizure. We reviewed 40 citations related to confiscated handicap placards, 31 were not destroyed or reported within five days. On average, the Parking Division took 17 days to report the citations.

Not adhering to state requirements regarding confiscated handicap placards may lead to the misuse of handicap parking by the public. This in turn may expose disabled citizens to unnecessary safety risk.

Recommendation

³ Chapter 681 of the State Transportation Code sets standards for Privileged Parking.

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

F. Use of City Vehicles

The Parking Enforcement division does not have adequate controls to ensure the proper use of City vehicles. Although the division implemented new policies and procedures in April 2015 requiring that parking enforcement employees log their miles, the audit office found that these logs were not being completed.

Two out of the eight vehicles reviewed did not contain a log and logs for another 3 vehicles were incomplete and did not account for all the miles driven. Adequate controls over vehicles help safeguard the city's assets and decrease the liability and cost associated with the misuse of vehicles.

Recommendation

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

G. Logical Access Controls

Logical access controls of citation writers are not adequate. Although citation writers track the officers logged into the devices, logon controls are not adequate. Specifically, officers share the same generic password when logging into their citation writers. In addition, usernames consist of employee's SAP number which is easily attainable. Effective logical access controls protect against unauthorized users and inappropriate access and/or modification of data.

Recommendation

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

Appendix A – Staff Acknowledgement

Buddy Vargas, CFE, Audit Manager
Cristina Stavley, Auditor in Charge
Cecilia Gonzalez, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

P.O. Box 839966
 SAN ANTONIO TEXAS 78283-3966

February 2, 2016

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

RE: Management’s Corrective Action Plan for Audit of Center City Development & Operations (CCDO), Parking Enforcement Division

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

Recommendation						
#	Description	Audit Report Page	Accept, Decline	Responsible Person’s Name/Title	Completion Date	
1	<p>Multiple Citations</p> <p>The Municipal Court Clerk should ensure the alert function within the application software is corrected and functioning as intended.</p>	4	Accept	Fred Garcia	December 2015	
<p>Action plan:</p> <p>Complete. The Municipal Court worked with e-citation and case management vendors to correct the alert functionality on the e-citation ticket writers. Parking Enforcement Officers are now able to tow or immobilize vehicles whose owner has three (3) or more parking offenses during one calendar year.</p>						

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
2	<p>Officer Safety</p> <p>The Director of CCDO implements an incident reporting process and performs a risk management study on the safety environment of officers and update safety policies and procedures.</p>	4-5	Accept	Jonathan Featherston	May 2016
<p>Action plan: CCDO is working with COSA Risk Management and other departments to determine best safety practices. CCDO is also in the process of implementing adding additional safety measures such as:</p> <ol style="list-style-type: none"> 1. Improve communication by upgrading to Smartphones 2. Installing LED safety strobe lights to all the parking enforcement vehicles 3. Adding a GPS function into the handheld electronic devices 4. Enforcement officer will attend Situational Awareness training provided by SAPD. 					
3	<p>Lack of Reconciliations</p> <p>The Director of CCDO and Municipal Court Clerk establish and implement formal procedures that ensure electronic and paper citations are accurately and timely transferred to the Incode System. This includes performing reconciliations for both electronic and paper citations.</p>	5	Accept	Jonathan Featherston/Fred Garcia	Completed

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan: The Municipal Court receives from CCDO electronic and paper citations.</p> <p>Electronic Citations written with notes and photos are electronically imaged in the court's case management system. Procedures are currently in place to ensure accurate and timely transfers of citations to the Court:</p> <ol style="list-style-type: none"> 1. Error messages within the individual handheld device will alert the user that transfer of data was not successful; 2. An error report is generated to identify potential problems for data transfer of citations and photos from the host server to the court's case management system; 3. Host servers have internal reports to detect errors in transmission or data; 4. Citizens and court staff provide timely awareness of potential missing citations. <p>A process has been established to whereby the CCDO enforcement officer will print a report showing the number of citations issued prior to syncing the handheld device to the server. Thereafter, CCDO Parking Enforcement Supervisors will be able to check the system and verify that the number of citations transferred by CCDO corresponds with the number of citations received by the Municipal Court.</p> <p>Paper The Municipal Court maintains original paper citations and creates an image of each paper citation submitted which is stored in the case management system. CCDO employees will identify and count paper citations delivered to Municipal Court for entry and filing. Court staff will verify and log count received from CCDO employees. Additionally, Court staff will log citations which are rejected for wrong or incomplete information to be returned to CCDO.</p>				
4	<p>Inconsistent Evidence & Support</p> <p>The Director of CCDO establish a minimum requirement for evidence gathering and document retention for parking citation categories including follow-up processes to determine effectiveness. In addition, ensure officers are properly trained on requirements.</p>	5-6	Accept	Jonathan Featherston	Completed

Recommendation						
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date	
<p>Action plan: CCDO has established minimum requirements for evidence gathering and document retention for parking citation categories. Additionally, follow up processes have been established to review effectiveness. All current officers have been properly trained on requirements.</p>						
5	<p>Handicap Parking</p> <p>The Director of CCDO creates and implements procedures and controls that ensure compliance with the State Code over handling of confiscated handicap placards.</p>	6-7	Accept	Jonathan Featherston	Completed	
<p>Action plan: CCDO has revised the existing procedure on the confiscation and destruction of handicap placards. The addition includes a time table of 5 business days to complete the destruction and state notification of confiscated placards. This time frame meets the state's requirement defined in Chapter 681 of The State of Texas Transportation Code.</p>						
6	<p>Use of City Vehicles</p> <p>The Director of CCDO ensures established policies and procedures are executed as intended for the proper use of City vehicles.</p>	7	Accept	Jonathan Featherston	Completed	
<p>Action plan: CCDO has established that the existing policies and procedures are executed as intended for the proper use of City vehicles. A monthly audit of vehicle logs has been added to the existing procedures.</p>						
7	<p>Logical Access Controls</p> <p>The Director of CCDO implements policies and procedures to improve logical access controls of citation writers.</p>	7	Accept	Jonathan Featherston	Completed	

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan: The design of the current eCitation system software does not include the capability to systematically support logical access controls according to COSA standards. Specifically, the system does not require users to reset passwords assigned by the system administrator upon initial use, nor do passwords expire (e.g. users are not prompted to change passwords at 90 day intervals). To compensate for this system limitation, the Parking Division has defined and will enforce a process-based solution for effective logical access control of the eCitation system and handheld devices. The Parking Enforcement SOP Binder issued to all Officers includes specific instructions for logical access control. Officers are instructed to immediately create a new, unique complex password via the Brazos website on first logon and every ninety (90) days thereafter. Officers will be required to provide written confirmation. Additionally, the Parking Enforcement Officers will be required to read AD 7.4A, review the associated Training Slides, and sign the electronic acknowledgement form once completed.</p>				

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

Sincerely,



 John Jacks, Interim Director
 Center City Development & Operations Department

2-12-16

 Date



 Lori Houston, Assistant City Manager
 City Manager's Office

2-14-16

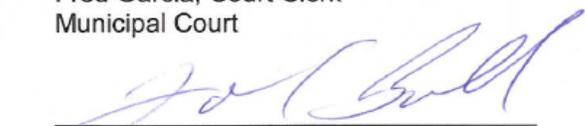
 Date



 Fred Garcia, Court Clerk
 Municipal Court

2-17-16

 Date



 Honorable John W. Bull
 Presiding Judge
 Municipal Court

2-17-16

 Date