



CITY OF SAN ANTONIO

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February 12, 2013

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SUBJECT: Audit Report of the San Antonio Police Department - Ground Transportation Unit

Mayor and Council Members:

We are pleased to send you the audit report of the San Antonio Police Department's Ground Transportation Unit. This audit began in May 2012 and concluded with an exit meeting with department management in December 2012. Management's verbatim response is included in **Appendix B** of the report. The San Antonio Police Department should be commended for its cooperation and assistance during this audit.

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

Respectfully submitted,

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

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CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR



Audit of San Antonio Police Department

Ground Transportation Unit

Project No. AU12-017

February 12, 2013

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

Executive Summary

At the request of management and as part of our annual Audit Plan approved by City Council, we conducted an audit of the San Antonio Police Department (SAPD) Ground Transportation Unit (GTU). GTU is responsible for enforcement of City ordinances governing taxicabs, limousines, tour and charter vehicles, pedicabs, and horse drawn carriages.

The audit objectives, conclusions, and recommendations follow:

Is SAPD adequately managing its ground transportation permit fees and inspection program?

No, SAPD is not adequately managing its ground transportation permit fees and inspection program. We identified multiple control deficiencies related to GTU's fiscal management, driver and vehicle permitting, safety of staff, information systems, and efficiency of operations. The deficiencies identified follow.

GTU Fiscal Management

- GTU does not have sufficient controls in place to properly track its revenue or verify its appropriateness.
- GTU does not consistently assess late fees.
- GTU does not collect horse carriage permit fees in accordance with City Code resulting in \$30,000 of lost revenue for 2011 and 2012.
- GTU does not maintain sufficient documentation of permit holders' compliance with City Code liability requirements
- GTU does not properly track and monitor the inventory of vehicle permit decals.

Driver and Vehicle Permitting

- GTU does not maintain sufficient documentation of the driver screening process to ensure that drivers are properly permitted in accordance with City Code requirements.
- GTU vehicle and driver records are inconsistent with information provided by permit holders.
- GTU enforcement activity is insufficient to ensure drivers and vehicles are in compliance with City Code.

Staff Safety

- GTU facilities and operations do not have appropriate safety components in place to protect staff and assets.

GTU Information System

- The GTU system does not provide functionality to meet GTU user needs for an efficient tool to manage and perform permitting, inspections, enforcement and fee collections.
- User access to the GTU system is not properly restricted.

Operational Efficiency

- GTU does not have necessary computer equipment and system access to perform its duties in an efficient and effective manner.
- GTU lacks operational performance measures.
- GTU's use of City Code as a its policy and procedures manual is not appropriate for operational efficiency

We have made recommendations to SAPD to address each of these issues. The recommendations are in the Audit Results and Recommendations section of this report beginning on page 4.

Given the broad nature of the issues identified in this audit, SAPD management should take a holistic approach to addressing these findings and recommendations. This will help ensure that any enhancements to policies, procedures, resources, and/or systems will properly address root causes of GTU's operational deficiencies and not simply the fragmented effects.

SAPD Management's verbatim response is in **Appendix B** on page 13.

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Background

The San Antonio Police Department's (SAPD) Ground Transportation Unit (GTU) is responsible for the overall enforcement of City Municipal Code Chapter 33 *Vehicles for Hire* (City Code) which governs all vehicles for hire¹ services operating in the City of San Antonio. These types of services include:

- Taxicabs
- Limousines
- Tour and Charter Vehicles
- Pedicabs
- Horse Drawn Carriages

While City Code requirements vary depending on the type of service involved, they were designed to promote efficient, safe, and reliable ground transportation services within the City of San Antonio. GTU's enforcement of these requirements is performed primarily through inspections, permitting, and fee collections. GTU also deploys enforcement efforts in the field, in cooperation with SAPD's Bike Patrol Unit and the Aviation Department's Airport Ground Transportation personnel.

Individuals and companies are not allowed to operate a ground transportation service in the City without executing a standard city permit agreement with GTU. According to GTU management, there are currently 80 ground transportation companies (permit holders) in operation. Approximately 90 percent of these permit holders are taxicab, limousine, and tour or charter bus operators. Each permit holder signs a permit agreement that defines and limits the number of vehicles they are allowed to operate. City Code limits the number of permits available City-wide for some types of vehicle for hire services, such as taxicabs and horse drawn carriages. Other types of services, such as limousine, tour, and charter services are not limited. However, a permit holder may only operate as many vehicles as allowed by the permit agreement. The agreement is in effect for three years; however, it may be amended to add or remove permits during the term of the agreement.

Additionally, all vehicles for hire must undergo a cosmetic and mechanical safety inspection prior to being issued an annual vehicle permit. Inspections are performed with the assistance of mechanics from Fleet Operations, which is a

¹ City Code defines "vehicle for hire" as every chauffeured vehicle, other than mass transit vehicles or vehicles involved in an organized car pool not available to the general public, which is operated for any fare or compensation and used for the transportation of passengers over city streets. These vehicles include, but are not limited to, taxicabs, buses, vans, motorcoaches, stretch limousines, classic vehicles, luxury vehicles and pedicabs.

division of the Building and Equipment Services Department. GTU collects fees for these inspections on behalf of Fleet. According to GTU management, in 2011, the unit inspected and permitted approximately 1,100 vehicles with Fleet’s assistance.

GTU also collects annual vehicle permit fees based on the type of ground transportation service and the number of permits authorized by the permit agreement, as shown in **Table 1** below.

Table 1: Annual Permit Fees per Vehicle

Vehicle Type		Amount
Taxicabs		\$440
Limousines		\$440
Tour & Charters	up to 15 passengers	\$440
	>15 passengers	\$550
Horse Drawn Carriages		\$600
Pedicabs		\$100

City Code allows payment to be made in quarterly installments due on the first business day of January, April, July, and October (horse carriage permit holders are allowed to pay in monthly installments). In FY 2011, GTU collected nearly \$500,000 in vehicle permit fees.

City Code also requires all drivers of vehicles for hire to obtain a City permit. Drivers must complete a defensive driving course and pass a drug test, physical, background check, and written exam to obtain a driver’s permit. Driver’s permits expire after 24 months and the screening process occurs each time drivers apply for or renew their permits. Drivers are also required to pay fees for new or renewed permits, which range from \$10 to \$11.

GTU shares an information system with SAPD’s Wrecker Services Division. GTU uses the system to manage vehicle for hire permitting, inspection and enforcement processes. The system consists of a graphical user interface that accesses data stored within a database. It houses key information regarding drivers, vehicles, and permit holders, as well as detailed transaction information for permit and fee collections.

Audit Scope and Methodology

The scope of this audit was vehicle for hire permitting, inspection, and revenue collection processes and related fees for calendar years (CY) 2007 to 2012.

We interviewed GTU and additional SAPD staff. We observed GTU processes related to the enforcement of City Code. We reviewed City ordinances,

administrative directives, and departmental operating procedures related to vehicle for hire and driver permitting processes. We also reviewed the IT Governance Institute's Control Objectives for Information and Related Technology (COBIT) framework to identify criteria and best practices for IT general and application controls. Additionally, we performed direct tests of data to determine the accuracy and completeness of recorded transactions.

We performed limited testing on the validity of the data in the GTU system. While we noted some minor discrepancies with the data, we do not believe these had a material effect on our testing as it relates to the audit objective. Therefore, we relied on computer-processed data in the GTU system to identify populations of drivers, vehicles, and permit holders to perform our testing. We also relied on the City's SAP system to validate the permit and inspection fees collected by GTU. Our reliance was based on performing direct tests on the data rather than evaluating the general and application controls of the system. However, we did test user access controls for both systems. We do not believe that the absence of additional testing of general and application controls had an effect on the results of our audit.

We conducted this audit from June 2012 to October 2012 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 audit results and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our audit results and conclusions based on our audit objectives. Our audit included tests of management controls that we considered necessary under the circumstances.

Audit Results and Recommendations

Given the broad nature of the issues identified in this audit, SAPD should take a holistic approach to addressing the following findings and recommendations. This will help ensure that any enhancements to policies, procedures, resources, and/or systems will properly address root causes of GTU's operational deficiencies and not simply the fragmented effects.

A. GTU Fiscal Management Needs Improvement

Revenue Verification

GTU does not have sufficient controls in place to properly track its revenue or verify its appropriateness. Specifically, sufficient detail information that would allow verification of fees assessed for each quarter is not retained. Currently, quarterly permit installment payments are tracked on an Excel spreadsheet, outside of the GTU system and outside of SAP. Each quarter the number of permits and the quarterly payment amount due are overwritten to reflect the current quarter. The spreadsheet does not document prior amounts paid or the number of permits used to calculate previous amounts due. It only shows whether a payment was received in previous quarters.

Additionally, permit fees are not invoiced nor are accounts receivable maintained for permit fee installments due the City. Therefore, GTU receivable amounts due the City are not reflected in the City's financial records.

Moreover, GTU does not properly reconcile SAP revenue accounts with the receipt transactions recorded in GTU's information system. We identified receipts for driver and operating permit fees in SAP that had not been recorded in GTU's system. Additionally, we found minor discrepancies in the amounts posted to the two systems and identified one payment that was not recorded in SAP. Also, inspection fees posted to SAP by Fleet are not reconciled back to the GTU system. Finally, we identified approximately \$24,000 in background check fees that were posted to the wrong GTU general ledger revenue account during FY 2012. During the course of the audit, GTU did take steps to correct this error. Proper reconciliation is essential for ensuring that the City's financial records are accurate and complete.

Late Fee Assessment

GTU does not consistently assess late fees when permit holders do not make permit fee installment payments on time. During CY 2011 and the first half of CY 2012, we identified 23 late permit fee payments. GTU staff did not assess late fees for 12 of these payments, resulting in approximately \$300 in uncollected late fees. While the amount of forgone late fees is not significant, consistent and

proper assessment of late fees encourages timely payment of monies due the City.

Horse Carriage Permit Fee Collection

GTU did not collect horse carriage permit fees for CYs 2011 and 2012 in accordance with City Code. According to GTU management, in September 2009, GTU issued new horse carriage permits outside the authority granted to it under City Code. When this error was discovered, GTU issued all horse carriage operators temporary permits at no charge. In 2010, the Code was revised to grant GTU the authority to issue new horse carriage permits. However, fees were not collected.

According to City Code, horse carriage permit holders must pay a fee of \$600 per carriage authorized. Additionally, City Code does not address use of temporary permits for carriages. We estimated that approximately \$30,000 in horse carriage permit fees were not collected in CYs 2011 and 2012. According to GTU, all permitted horse carriage companies will be required to pay permit fees beginning January 2013.

Required Liability Documentation

GTU does not maintain sufficient documentation of permit holders' compliance with City Code liability requirements to ensure that the City's interests are protected. Specifically, GTU did not have on file a complete and current tax affidavit from the City Treasury for 7 of the 12 permit holders reviewed. The purpose of the tax affidavit is to certify that all ad valorem taxes were paid. Additionally, GTU did not have current bond information for one permit holder and an adequate drug free workplace policy for another.

City Code requires that the City's Treasury Division determine that all ad valorem taxes have been paid in full. It also requires permit holders to carry sufficient liability insurance, bond coverage, and establish and enforce a drug free workplace policy. Without proper documentation of permit holder compliance with key liability requirements in City Code, the City's interests in the regulation of ground transportation services are not properly protected.

Permit Decal Tracking

GTU does not properly track and monitor the inventory of vehicle permit decals. The pre-numbered decals were not being logged or reconciled. Although GTU took steps to create permits logs during the course of the audit, a reconciliation of these logs or other inventory of the decals is still not performed.

Also, GTU does not ensure that permit numbers are not duplicated. We identified 163 vehicle records in the GTU system that showed a duplicate permit number. Duplicate permit numbers prevent proper tracking and reconciliation of permit

decals. According to GTU, orders are placed for different colored decals each year. However, GTU does not ensure that permit numbers do not overlap.

The value of vehicle for hire permits range from \$100 to \$600; therefore, the permit decals should be safeguarded accordingly. AD 8.12 requires that materials or supplies to be sold during the course of department operations be inventoried at least annually. Inadequate controls over the supply of vehicle permit decals make detection of lost, stolen, or misappropriated permits difficult.

Recommendations

The Police Chief should develop and implement procedures to improve the controls over the fiscal components of GTU operations. These procedures should address:

- Accounting for and documenting revenues
- Consistency in the application of late fees
- Managing permit inventory
- Receipt, approval, and retention of liability documentation

The Police Chief should also immediately develop and implement a process to charge for and collect horse carriage operator permit fees.

B. Driver and Vehicle Permitting Controls Need Improvement

Driver Screening and Permitting

GTU does not maintain sufficient documentation of the driver screening process to ensure that drivers are properly permitted in accordance with City Code requirements. GTU did not have proper screening documentation for 15 of 25 driver profiles we tested. Of these 25 driver profiles, we tested 125 documents. Overall, there were four documents that were not current based on the date of the driver's most recent application or renewal. Additionally, 33 documents did not provide sufficient support or were not available. In particular, evidence of drug testing and completion of the written exam were the most frequently missing documents.

Per City Code, any driver applying for or renewing their City driver's permit must provide evidence of a current passing drug test, completion of a defensive driving course, and a physical. Additionally, drivers are required to pass a criminal background check and written driving exam administered by GTU. Without proper controls over the driver screening process, GTU cannot properly ensure that drivers are qualified and permitted in accordance with City Code.

Vehicle and Driver Records

GTU vehicle and driver records are not consistent with information provided by permit holders. This is due to lack of a formalized process to obtain and verify permit holders records. Currently, GTU accepts vehicle and driver information from permit holders on an ad hoc basis. During our testing, we identified several discrepancies in the initial information provided by some permit holders. This included:

- 2 of 181 drivers reported by permit holders did not have a record in the GTU system presumably indicating they were driving without a permit
- 9 of 180 vehicles reported as in service by permit holders did not have a record in the GTU system presumably indicating they were operating without a permit

We also reviewed the permit holder, driver, and vehicle data in the GTU system and noted several inconsistencies when compared to the information provided by permit holders. These included:

- 56 of 181 driver records had one or more inconsistencies in key data fields such as different Texas drivers license expiration dates
- 66 of 180 vehicle records had one or more inconsistencies in key data fields such as different vehicle identification numbers or license plate numbers
- 1 permit holder had two different records in the system
- 5 of 86 permit holder records were inappropriately marked “active” in the GTU system.

Without formalized procedures in place to enforce these requirements, GTU is unable to ensure that permit holders are in compliance with their agreements.

Enforcing Permitting Requirements

GTU performs insufficient enforcement activity to ensure drivers and vehicles are in compliance with City Code. During annual inspections and taxicab meter verifications, which range from a week to a couple of months at a time, all inspectors work from the office to handle the volume of vehicles brought in. During these periods, there is no field enforcement coverage for the day or night shifts. Based on the inspection schedule and the frequency of meter verifications, there are approximately six months out of the year that inspectors do not perform proactive enforcement in the field.

Also, GTU Inspectors and staff do not have direct access to current Municipal Court Records. To obtain information essential to properly perform driver permitting, renewal, and City Code enforcement efforts, GTU staff must call Municipal Court. Direct access to complete and timely information is essential for efficient and effective enforcement efforts. According to GTU management, staff was granted access to the Municipal Court information system in November 2012.

Recommendations

The Police Chief should implement proper controls to ensure that drivers and vehicles are properly permitted. These controls should include, but not be limited to, maintaining sufficient documentation of the driver screening process to ensure that drivers are qualified and properly permitted. They should also include developing documented processes for collecting and recording permit holder information to ensure that information is complete and accurate. Finally, the Chief should increase the level of proactive enforcement activity.

C. GTU is Not Properly Equipped to Promote Staff Safety

GTU is not adequately equipped to promote a safe environment for staff. Specifically, the GTU office does not have proper physical security measures. There is no safety glass, locking door or other physical barrier to secure GTU work areas. In the course of their permitting duties, GTU staff and inspectors may deny or revoke driver and vehicle permits, which essentially prevents drivers from working. These conditions may increase the probability of threatening or violent behavior towards GTU staff. Also, GTU offices are somewhat isolated. As such, proper physical security measures are essential for ensuring the safety of GTU staff.

Additionally, GTU has four inspectors who rotate between day and night shifts. Usually, one inspector remains in the office during the day, while the other two go out into the field. The fourth inspector works the night shift. Since most limousines and horse carriages do not operate during the day, the night shift is busier than the day shift. This coverage issue, combined with the inherent nature of nighttime activities, raises concerns regarding the safety of a single inspector working alone.

Recommendation

The Police Chief should improve the safety components of the GTU facilities and operations to increase protection of GTU staff and assets.

D. GTU Information System Does Not Provide Adequate Functionality

Meeting User Needs

The GTU system does not adequately meet GTU user needs for an efficient tool to manage and perform permitting, inspections, enforcement and fee collections. All records in the system are based on the company master table. When vehicles and drivers are utilized by multiple companies, this results in multiple records for the same vehicle or driver throughout the system. Each record must be updated individually to ensure that vehicle and driver information is tracked properly.

Additionally, data entry controls to prevent entry of a duplicate Texas driver's license were not sufficient.

Also, the system lacks a direct query for citation data from the user interface. Furthermore, the system uses an open text field for the citation description, which allowed inconsistent labeling of citations to occur. For example, we found at least 17 different variations of citations for driving without a city driver's permit in the system.

Moreover, since the inspection process is paper based, inspection data must be scanned and manually entered into system. GTU currently scans the forms in bulk and attaches them to the company record. As a result, inspection forms are not attached to the vehicle records in the system.

The system also does not have a way to efficiently identify vehicles that are no longer in service. Additionally, the actual out of service date is not captured unless the user manually documents it in the notes section.

Furthermore, the system does not automatically populate key vehicle, driver, and transaction data fields, which compromises the integrity of the data in the system. For example, driver permit expiration dates and vehicle out of service dates may be miscalculated or manipulated, while payment information may be entered for the wrong amount or the wrong date.

The system has additional limitations in terms of fiscal operations. It does not interface with SAP. It also lacks invoicing and other account management features that would allow users to properly track payments received and balances due. Additionally, the system allows only a single fee to be assigned to a transaction. For example, a single dollar amount is recorded as "3rd Quarter Permit Fees;" however, the amount of the transaction may actually include a \$28 late fee. Such limitations make it critical that users manually note sufficient transaction detail in the "notes" field. Finally, existing reporting features are not adequate for properly managing daily deposits. For instance, day close reporting currently shows all payments received in the system from any location and does not distinguish between fees for wrecker operations and ground transportation operations.

Restricting Users Access

User access to the GTU system is not properly restricted. We examined user access profiles for 34 GTU and Wrecker Services users. We determined that 10 of the 34 users had inappropriate access to the system. Seven of these users were no longer employed with the City. We also identified three users that had transferred to another department, but still retained access to the system. This occurred because SAPD management has not developed protocols for managing access to the system.

The GTU system has broad access roles that do not properly restrict user access at the functional level, which prevents proper segregation of duties. Access levels are divided into two broadly defined roles, “Admin” and “User”. “Admin” access allows users create, read, update, and delete privileges within the system. “User” access only allows users read and delete privileges. Also, the system does not have a “read only” access role.

Recommendations

The Police Chief should collaborate with ITSD to define GTU key business processes and facilitate development of a sufficient information system that meets GTU needs. The Chief should also work with ITSD to define criteria for functional user access and develop appropriate user access controls that will reduce the potential for unauthorized changes to GTU and Wrecker Services data. Where such controls are not feasible, develop mitigating controls, such as the use of user activity reports or other methods for monitoring changes to the data.

E. GTU Lacks Adequate System Resources

GTU does not have proper resources to ensure that staff performs its duties in an efficient and effective manner. Inspectors do not have access to the GTU system or other City information systems when they are in the field. GTU’s two vehicles are not equipped with a laptop or similar device. Inspectors rely on the communication with staff at the GTU office via a two-way radio to ascertain the status of drivers (permit status, warrants, citations, etc.). Inspectors working the night shift must rely on SAPD dispatch to provide this information since the GTU office is closed and staff does not have direct access to needed information. Additionally, citations are issued using manual citation books instead of handheld devices which results in significant time spent when issuing a citation.

Recommendation

The Chief of Police should equip GTU staff with laptops and other necessary equipment to increase efficiencies of operations.

F. GTU Lacks Operational Performance Measures

GTU does not adequately address performance measurement. Although its policies do define measureable activities, such as the number of applicants processed or the number of vehicles inspected, they do not include thresholds for measuring performance. Performance thresholds communicate management expectations regarding employee performance and identify potential areas for improvement in an organization’s operations.

Recommendation

The Police Chief should develop appropriate performance measures and clear goals for GTU. Actual results should be measured against established performance measures and reviewed regularly.

G. GTU's Use of City Code is Not Appropriate for Operational Efficiency

GTU relies primarily on City Code as their policy and procedure manual. Instead of providing authority and high level guidance for GTU operations, the City Code has evolved into a detailed operational document with ambiguities and inconsistencies. Also, procedural changes require modification of the Code requiring unwarranted investment of City resources due to the formal processes needed to codify operational decisions. However, these decisions could simply be updated in departmental policies and procedures. City Code should generally provide high level guidance and provide for authority of enforcement activities. The authority for daily operations should be delegated to department management to allow for flexible changes to maintain efficient and effective operations.

Recommendation

The Police Chief, in coordination with the City Attorney's Office, should reevaluate the authoritative governance of GTU operations to identify areas to increase the efficiency and precision of its operations.

Appendix A – Staff Acknowledgement

Brian K. Williams, MBA, CIA, CFE, CRMA, CGAP, Audit Manager
Cynthia Hicks, CIA, CFE, Auditor in Charge
Arlena Sones, CPA, CIA, CGAP, Auditor

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

January 30, 2013

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

RE: Management's Corrective Action Plan for the Audit of San Antonio Police Department (SAPD)
Ground Transportation Unit Permit Fee and Inspection Program

SAPD has reviewed the audit report and has developed the Corrective Action Plans below corresponding to report recommendations.

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A	<p>GTU Fiscal Management Needs Improvement</p> <p>Recommendation: The Police Chief should develop and implement procedures to improve the controls over the fiscal components of GTU operations. These procedures should address:</p> <ul style="list-style-type: none"> Accounting for and documenting revenues Consistency in the application of late fees Managing permit inventory Receipt, approval, and retention of liability documentation <p>The Police Chief should also continue to develop and implement a process to charge for and collect horse carriage operator permit fees.</p>	p. 6	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	4 th Qtr FY 2013

Appendix B – Management Response (continued)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan:</p> <ul style="list-style-type: none"> • Revenue Verification – Enhancements to the GTU system will be made to track revenue and verify appropriateness for each quarter, track invoices for permit fees and outstanding balances. These enhancements will take thru the 4th Qtr, during this time GTU staff and Fiscal Services Staff will meet monthly to reconcile the revenues posted in the GTU system with the deposits in SAP. • Late Fee Assessment – A draft SOP has been created to ensure late fees are consistently assessed and collected on the second business day of the quarter. • Horse Carriage Permit Fee Collection – January 2010, City Council approved an ordinance revision to authorize the Chief of Police to issue Horse Carriage Permits. Collections of permit fees were held in abeyance until the completion of a Market Analysis and Rate Study of the Ground Transportation Industry scheduled for the summer of 2010. This study was presented in February 2011 and staff was then directed to review the current Horse Carriage permitting process. Fees continued to be held in abeyance. In April 2011 the Public Safety Committee directed that a Traffic Impact Analysis of the Horse Carriage Industry be conducted. November 2012, the Traffic Impact Analysis was presented to the Transportation Advisory Board. No changes were made to the number of neither permits nor the permit fees. In January 2013 the Chief of Police issued Horse Carriage permits and began collecting the permit fees. • Permit Decal Tracking – Citywide and Airport permits have been numbered in sequential order to prevent duplication of permit numbers. Airport permits were issued effective December 2012 and citywide permits will be issued during the inspection process in 2013. In addition, a Draft SOP has been created to require a quarterly inventory. • Required Liability Documentation – GTU has reviewed 100% of the companies to ensure that a current copy of all liability documentation is on file, a draft SOP has been created to require that all companies' files be reviewed annually to ensure current documentations are kept. In addition to the annual review, the GTU system will be enhanced to provide a report of non-compliant companies throughout the year. 				

Appendix B – Management Response (continued)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
B	<p>Driver and Vehicle Permitting Controls Need Improvement</p> <p>Recommendation: The Police Chief should implement proper controls to ensure that drivers and vehicles are properly permitted. These controls should include, but not be limited to, maintaining sufficient documentation of the driver screening process to ensure that drivers are qualified and properly permitted. They should also include developing documented processes for collecting and recording permit holder information to ensure that information is complete and accurate. Finally, the Chief should increase the level of proactive enforcement activity.</p>	p. 8	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	4 th Qtr FY 2013
<p>Action plan:</p> <ul style="list-style-type: none"> • Driver Screening and Permitting – Currently, GTU is using a manual process that keeps all documents up to date. Programmers are upgrading the GTU system to run a weekly report that will notify staff of expired documentation. • Vehicle and Driver Records – a draft SOP has been created to require annual reviews of vehicle and drivers records. In addition, possible mobile devices will allow for random verification of vehicle and drivers records when the inspector makes contact in the field. • Enforcing Permitting Requirements – Enhancements to the GTU system will improve the permitting process by ensuring all required items are entered into the GTU system prior to a permit being printed. Municipal Courts has allowed GTU staff access to the Tyler system, providing direct access to Municipal Court records to conduct driver records checks. • Proactive enforcement activities – Inspectors work hours will be adjusted to provide for more proactive enforcement during evenings and weekends. Security enhancements to the GTU Facility will afford security for a single staff member to remain in the office instead of the current requirement of two. 					
C	<p>GTU is Not Properly Equipped to Promote Staff Safety</p> <p>Recommendation: The Police Chief should improve the safety components of the GTU facilities and operations to increase protection of GTU staff and assets.</p>	p. 8	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	2nd Qtr FY 2013

Appendix B – Management Response (continued)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan:</p> <ul style="list-style-type: none"> • A contractor has been hired and work is currently in progress to enhance the protection of GTU staff. This project includes: <ul style="list-style-type: none"> ▪ Install glass partitions and adding a door to the front waiting area. ▪ Replace side glass door with a metal door ▪ Install iron bars on all exterior windows. 				
D	<p>GTU Information System Does Not Provide Adequate Functionality</p> <p>Recommendations: The Police Chief should collaborate with ITSD to define GTU key business processes and facilitate development of a sufficient information system that meets GTU needs.</p> <p>The Chief should also work with ITSD to define criteria for functional user access and develop appropriate user access controls that will reduce the potential for unauthorized changes to GTU and Wrecker Services data. Where such controls are not feasible, develop mitigating controls, such as the use of user activity reports or other methods for monitoring changes to the data.</p>	p. 10	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	4 th Qtr FY 2013

Appendix B – Management Response (continued)

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
	<p>Action plan:</p> <ul style="list-style-type: none"> In lieu of an enterprise point of sale application, improvements will be made to the current web-base Ground Transportation System. GTU System Improvements include: <ul style="list-style-type: none"> Collect detailed financial transactions, Include additional data fields to capture additional information, Link companies to vehicles, drivers, permits and inspections, Systems reports to allow for improved record management, and Segregate Wrecker Services data from Ground Transportation data. Meeting User Needs – In-House improvements to the GTU System will allow access to a number of new financial and administrative reports, data tables, and information fields. Older desktop computers have been replaced with newer models. Restricting Users Access – A security form has been developed and must be filled out and signed by a supervisor prior to anyone having access to the system. The GTU system has been reviewed and only approved personnel have access. A draft SOP has been created that requires a quarterly review of users and user roles. 				
E	<p>GTU Lacks Adequate System Resources</p> <p>Recommendation: The Chief of Police should equip GTU staff with laptops and other necessary equipment to increase efficiencies of operations.</p>	p. 10	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	4 th Qtr FY 2013
	<p>Action plan:</p> <ul style="list-style-type: none"> GTU staff is evaluating which mobile device would be best suited for their operation. Currently staff is evaluating a small handheld tablet; however additional devices will be evaluated before a final decision is made. Additionally, staff is identifying the programs needed for field access. Funding for the identified device will be sought during the budget development. Additional inspector positions and other efficiencies will be evaluated during the budget development process. 				

Appendix B – Management Response (continued)

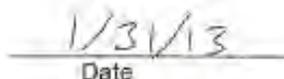
Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
F	<p>GTU Lacks Operational Performance Measures</p> <p>Recommendation: The Police Chief should develop appropriate performance measures and clear goals for GTU. Actual results should be measured against established performance measures and reviewed regularly.</p>	p. 11	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	1 st Qtr FY 2013
<p>Action plan:</p> <ul style="list-style-type: none"> A draft SOP has been created to establish performance measures for GTU. These measures will include: the number of field contacts, correction notices given, customer complaints or issue resolved and field inspection performed. 					
G	<p>GTU's Use of City Code is Not Appropriate for Operational Efficiency</p> <p>Recommendation: The Police Chief, in coordination with the City Attorney's Office, should reevaluate the authoritative governance of GTU operations to identify areas to increase the efficiency and precision of its operations.</p>	p. 11	Accept	<p>Dennis Rosenberry Administrative Services Officer</p> <p>Steven Baum Assistant Police Director</p>	4 th Qtr FY 2013
<p>Action plan:</p> <p>A collaborative effort will be undertaken with the City Attorney's Office, Transportation Advisory Board, and Public Safety Committee to review and amended Chapter 33 of the City Code before July 2013.</p>					

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

Sincerely,



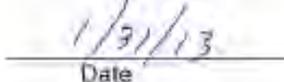
William McManus
Police Chief
San Antonio Police Department



Date



Erik Walsh
Deputy City Manager
City Manager's Office



Date