



CITY OF RICHMOND
CITY AUDITOR

DATE: May 30, 2019

TO: Mrs. Selena Cuffee-Glenn
Chief Administrative Officer

FROM: Louis Lassiter *LL*
City Auditor

SUBJECT: Richmond Police Department (RPD)
Property and Evidence Unit Audit

The City Auditor's Office has completed the RPD Property and Evidence Unit audit and the final report is attached.

We would like to thank the RPD staff for their cooperation and assistance during this audit.

Attachment

cc: The Richmond Audit Committee
The Richmond City Council
William Smith, Acting Chief of Police

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2019-12
Richmond Police Department
Property and Evidence Unit Audit
City of Richmond, VA
City Auditor's Office
May 30, 2019



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Highlights

Audit Report to the Audit Committee,
City Council, and the Administration

Why We Did This Audit

The Office of the City Auditor conducted this audit as part of the FY19 audit plan approved by the Audit Committee.

This audit was conducted at the request of the former Richmond Police Chief.

What We Recommend

That the Deputy Chief of Business Services:

- Implement a Business Continuity Plan that identifies the critical operational areas within the Property and Evidence Unit.
- Install an internal secondary barrier within the warehouse.
- Install security cameras in the Drugs and Firearms Rooms.
- Establish a formal process to test the cameras on a periodic basis to ensure they are functioning and recording as intended.
- Ensure the camera viewing the Drugs and Firearms Rooms are set to record and retain footage.
- Deactivate and monitor deactivation of all separated employees from all buildings and systems.
- Establish formal procedures to communicate with the P&E Unit to deactivate separated employees from the TraQ System.
- Ensure that annual audits are conducted in compliance with CALEA standards.
- Ensure compliance with the General Order mandate to dispose of Firearms annually.

The auditors made other written and verbal recommendations to improve their operation.

Property and Evidence Unit

Background The Property and Evidence Unit (P&E) is charged with preserving evidence collected during the investigation of crimes, as well as maintaining property in their possession. They must maintain a chain of custody that allows for the admission of evidence in subsequent court proceedings. It is primarily the custodian of evidence and as such does not have authority to make independent decisions regarding the disposition of evidence. The authority rests with the police officers who collect the evidence, Commonwealth Attorney or other agencies, depending on the situation. During CY 2018, the P&E Unit received 24,185 new property and evidence items and disposed of 10,958 items.

Commendations

- The P&E had their required audits and inspections with minimal exception.
- The auditors traced inventory items from various sources and noted no exceptions.
- Public access to the facility is properly controlled.
- Cash is properly reconciled and reviewed by the Audit & Compliance Division.

Needs Improvements

Finding #1 – Business Continuity Plan (BCP) – The P&E Unit has a walk-in refrigerator that contains evidence that must be preserved through refrigeration. However, the facility does not have a backup generator to mitigate the risk of losing refrigerated evidence due to a power failure. Additionally, they do not have a Business Continuity Plan (BCP) that addresses continuous preservation of evidence during a power outage.

Finding #2 - Internal Secondary Security Barrier - During the design of the new facility, management did not include an internal secondary barrier to prevent further access to the facility.

Finding #3 – Cameras in Critical Areas - The P&E did not install a camera inside the Drugs and Firearms Rooms to view activities within those rooms. Management placed a camera outside the doors. However, the camera was not set to record.

Finding #4 – Access to Buildings and Systems – Twelve former employees had access to the P&E facility. Four of those employees had access to the active directory. Two former Neighborhood Assistance Officers had access to the facility. The Records and Technology Division did not have a formal process to deactivate separated employees from all systems.

Finding #5 – TraQ Access Security - As of April 2019, the Richmond Police Department (RPD) had six former employees who still had access to the property and evidence TraQ System.

Finding #6 – Annual Audit - The Audit and Compliance Division within RPD did not conduct the annual audit of property and evidence held by the Department. Non-compliance with the CALEA Standards could lead to losing accreditation.

Finding #7 – Firearms Disposal - The P&E Unit did not conduct the annual Firearms Disposal.

Finding #8 – Bicycle Inventory - During CY 2018, the P&E Unit received 186 bicycles. As of December 31, 2018, only 49 of those bicycles had been removed from their inventory. The P&E Unit did not dispose of bicycles as permitted by State Code.

Finding #9 – Update Standard Operating Manual - The P&E Unit's Policies & Procedures Manual has not been updated to reflect the current environment.

Finding #10 – Update Substance Abuse Policy - The current RPD Substance Abuse Policy does not reflect the Central Human Resources Department's Policy.

Management concurred with **10** of **12** recommendations. We appreciate the cooperation received from management and staff while conducting this audit.



BACKGROUND, OBJECTIVES, SCOPE, METHODOLOGY, MANAGEMENT RESPONSIBILITY and INTERNAL CONTROLS

This audit was conducted in accordance with the Generally Accepted Government Auditing Standards promulgated by the Comptroller General of the United States. 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 the audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

BACKGROUND

The Property and Evidence Unit (P&E) is charged with preserving evidence collected during the investigation of crimes, as well as maintaining property in their possession. The Unit is responsible for establishing procedures to ensure:

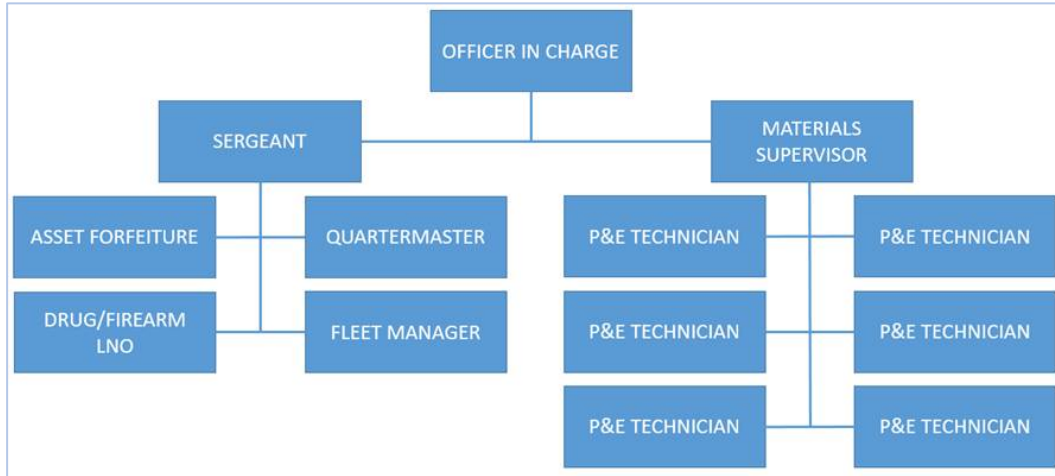
- Proper storage of valuable and sensitive items, such as cash, drugs, firearms, precious metals, and jewelry.
- Safe handling of biological evidence and preserving the integrity of the evidence for further analysis.
- Proper storage of property collected that do not have evidentiary value.

The P&E Unit must maintain a chain of custody that allows for the admission of evidence in subsequent court proceedings. It is primarily the custodian of evidence and as such does not have the authority to make independent decisions regarding the disposition of evidence. The authority rests with the police officers who collect the evidence, Commonwealth Attorney or other agencies, depending on the situation. During CY 2018, the P&E Unit received 24,185 new property and evidence items and disposed of 10,958 items.

The FY18 adopted budget for the P&E Unit was \$1,427,052. The Capital Improvement Plan had an approved appropriation of \$2.9 million for a new Property and Evidence Center. The P&E Unit moved into the newly renovated facility in October 2018.

Organizational Structure:

The P&E Unit is a Division within the Richmond Police Department. An officer in charge (OIC) oversees a staff of 12 sworn and non-sworn officers and civilians as follows:



Source: P&E staff

This audit did not cover the Quartermaster activities.

OBJECTIVES

The objectives for this audit were to verify that the P&E Unit had sufficient controls surrounding the process of collecting, storing and securing all police evidence and personal property; and to evaluate the efficiency and effectiveness of operations.

SCOPE

The controls and procedures in place for the property and evidence received by the P&E Unit during CY 2018 and the current environment.

METHODOLOGY

The auditors performed the following procedures to complete this audit:

- Interviewed management and staff;
- Reviewed and evaluated relevant policies and procedures and tested for compliance;
- Reviewed hard copy files;

- Traced property and evidence items from various sources to ensure inventory completeness and accuracy; and
- Performed other tests, as deemed necessary.

MANAGEMENT RESPONSIBILITY

City management is responsible for ensuring resources are managed properly and used in compliance with laws and regulations; programs are achieving their objectives; and services are being provided efficiently, effectively, and economically.

INTERNAL CONTROLS

According to the Government Auditing Standards, internal control, in the broadest sense, encompasses the agency's plan, policies, procedures, methods, and processes adopted by management to meet its mission, goals, and objectives. Internal control includes the processes for planning, organizing, directing, and controlling program operations. It also includes systems for measuring, reporting, and monitoring program performance. An effective control structure is one that provides reasonable assurance regarding:

- Efficiency and effectiveness of operations;
- Accurate financial reporting; and
- Compliance with laws and regulations.

Based on the audit test work, the auditors concluded that the P&E Unit has proper controls in place to ensure proper chain of custody and preservation of evidence. The auditors noted some areas of improvement, which are discussed throughout the report.

FINDINGS and RECOMMENDATIONS

What Works Well

Commendations

Audits and Inspections

- In order to obtain accreditation, law enforcement agencies must demonstrate compliance with the Commission on Accreditation for Law Enforcement Agencies, Inc. (CALEA) Standards. This accreditation provides assurance to the public and the administration that the Richmond Police Department (RPD) is accountable and has policies and procedures that address the efficiency and effectiveness of their daily operation. The auditors noted RPD has General Orders in place to ensure compliance with the CALEA Standards. The table below depicts audits and inspections required by CALEA and compliance with the Standard:

CALEA Standard	Description	In General Order	Frequency	In Compliance
84.1.6a	An inspection conducted by the P&E Unit of property and evidence inventory control to ensure adherence to procedures.	Yes	Semi-annual	Yes
84.1.6b	Inventory all evidence and property when change of command for new custodian.	Yes	Change of OIC	Yes
84.1.6c	<i>An annual audit of property and evidence held by the P&E Unit is conducted by a supervisor not directly connected with control of property and evidence.</i>	Yes	Annual	No*
84.1.6d	Unannounced inspection of property and evidence storage should be conducted at least once a year.	Yes	Semi-annual	Yes

*Except for the annual audit to be conducted by the Audit and Compliance Division, the P&E Unit conducted the required audits.

Chain Of Custody

- The auditors randomly selected a sample of 190 property and evidence items from the drugs, firearms and warehouse shelves, and found no exceptions. All inventory items were accounted for and easily identified. We also tested a random sample of 10 vehicles from the tow lot and found no exception.

Public Access to the Property & Evidence Facility

- Auditors noted access to the facility is controlled and limited to a receiving area that does not allow entry without an escort.

Asset Forfeiture

- During CY2018, the P&E Unit conducted monthly reconciliations, which were verified by the Audit and Compliance Division within RPD.

What Needs Improvement

Finding #1 – Business Continuity Plan

On October 31, 2018, the P&E Unit moved to a newly renovated facility. The new facility has a walk-in refrigerator that contains evidence that must be preserved through refrigeration. The auditors noted the new facility does not have a backup generator to mitigate the risk of losing refrigerated evidence due to a power failure. Additionally, they do not have a Business Continuity Plan (BCP) that addresses continuous preservation of evidence during a power outage. Properly preserving evidence is critical for its admissibility in court. Improper storage can lead to contamination of evidence, which could result in compromising court cases.

According to CALEA Standard 84.1.2, “When assessing the degree of security to provide, the agency should weigh the importance of the property it is placing in these areas and the consequences if the property is stolen, damaged, or contaminated while in custody.”

Recommendation:

- 1. We recommend the Police Deputy Chief of Business Service implement a Business Continuity Plan that identifies the critical operational areas within the Property and Evidence Unit. The Plan should at least include installing a generator to ensure continuous power supply for the refrigerators.***

Finding #2 - Internal Secondary Security Barrier

The auditors noted that upon gaining access to the warehouse, the Property and Evidence Unit does not have a secondary barrier inside the building to prevent further access to the facility. CALEA Standard 84.1.2 states, "When assessing the degree of security to provide, the agency should weigh the importance of the property it is placing in these areas and the consequences if the property is stolen, damaged, or contaminated while in custody." According to management, the design of the new facility did not include an internal barrier.

This oversight exposes the property and evidence inventory held by the P&E Unit. This could compromise the chain of custody as well as the outcome of court cases.

Recommendation:

- 2. We recommend the Police Deputy Chief of Business Services install a secondary barrier inside the warehouse.***

Finding #3 – Cameras in Critical Areas

The P&E Unit installed cameras throughout the new facility. One camera was placed outside the entrance to the Drugs and Firearms Rooms. However, they did not install cameras inside to monitor all activities within those rooms. The auditors also noted the camera that monitored the entry to the Drugs and Firearms Rooms was not set to record the activities outside those rooms.

CALEA Standard 84.1.2 states that, "When assessing the degree of security to provide, the agency should weigh the importance of the property it is placing in these areas and the consequences if the property is stolen, damaged, or contaminated while in custody."

According to staff, the P&E Unit was in the process of installing cameras in the Drugs and Firearms Rooms, but had to prioritize placing the cameras in other areas. Additionally, the

auditors noted the Records and Technology Division does not have a process in place to test whether the cameras are functioning and recording as intended. If property and evidence held by the P&E Unit is missing or compromised, RPD may not be able to gauge any wrongdoing in those critical rooms as well as not being able to identify any specific individuals.

Recommendations:

3. *We recommend the Police Deputy Chief of Business Services install security cameras in the Drugs and Firearms Rooms.*
4. *We recommend the Police Deputy Chief of Business Services establish a formal process to test the cameras on a periodic basis to ensure they are functioning and recording as intended.*
5. *We recommend the Police Deputy Chief of Business Services ensure the camera viewing the Drugs and Firearms Rooms are set to record and retain footage.*

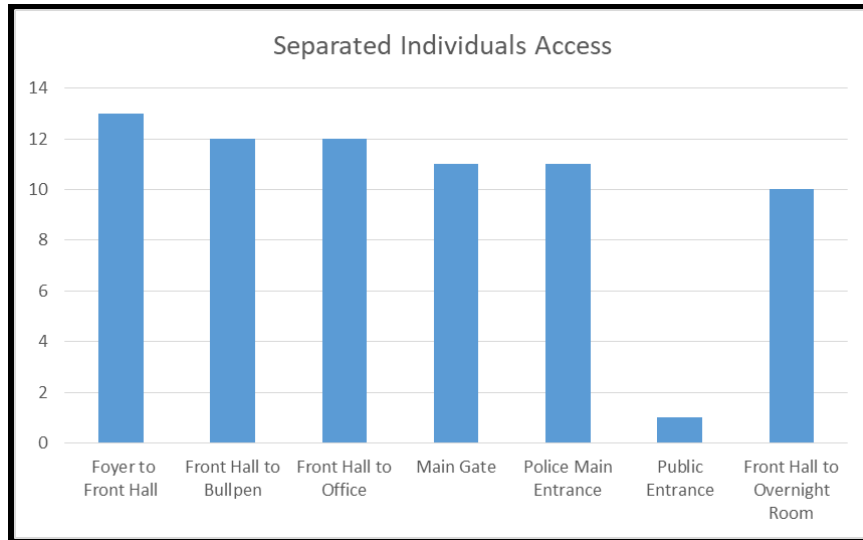
Finding #4 – Access to Building and Systems

As of April 15, 2019, 769 individuals had access to the P&E facility as follows:

Employee Status	# of Employees
Active Employees	
Police Staff	737
Fire	9
DPW- Facilities	6
Neighborhood Assistance Officer	2
Cleaning Contractor	1
Separated Employees	
Police Staff	12
Neighborhood Assistance Officer	2
Total	769

Source: prepared by auditor

The auditors noted 14 of those individuals had separated from City service. However, they still had access to the facility. The chart below depicts the entry points for these individuals:



Source: prepared by auditor

Of these fourteen individuals, four still had active directory accounts for the City network. The auditors obtained documentation to demonstrate that 11 of the separated employees had submitted their badges upon separation. RPD Human Resources staff could not locate one of the separation checklists, and the remaining two individuals were Neighborhood Assistance Officers.

According to Administrative Regulation 4.12, every City employee must have a valid City identification card, which must be deactivated immediately upon separation. In addition, the International Association for Property and Evidence (IAPE) Standard 8.5 states, "All keys, access codes, combination numbers, and proximity cards should be closely monitored and accounted for annually. Keys should not be available to anyone other than property room personnel." The auditors noted the Records and Technology Division within RPD does not have a formal process in place to deactivate separated employees from all systems. Former employees that are not deactivated in the system may gain unauthorized access to City networks and facilities. This could compromise the property and evidence held by the P&E Unit.

Recommendation:

- 6. We recommend the Police Deputy Chief of Business Services establish formal procedures to deactivate and monitor deactivation of all separated employees from all buildings and systems.*

Finding #5 – TraQ Access Security

As of April 2019, RPD had six former employees who still had access to the property and evidence TraQ System. These employees were separated from the City as follows:

Employee	Date of Separation
1	October 13, 2017
2	September 14, 2018
3	November 30, 2018
4	December 7, 2018
5	January 5, 2019
6	February 15, 2019

According to PD 79 (change in Duty Status), a separation checklist must be completed and forwarded to the appropriate staff to terminate access to computers and databases. The auditors noted the Records and Technology Division within RPD does not have a formal process to communicate with the P&E Unit regarding deactivation of separated employees from the TraQ System. Untimely removal of separated employees could lead to compromising evidence.

Recommendation:

- 7. We recommend the Police Deputy Chief of Business Services establish formal procedures to communicate with the Property and Evidence Unit to deactivate separated employees from the TraQ System.*

Finding #6 – Annual Audit

The Audit and Compliance Division within RPD did not conduct the annual audit of property and evidence held by the Department. According to CALEA, the Department must conduct an annual audit of property and evidence. A supervisor who is not routinely or directly connected with

control of the property and evidence must conduct the audit. RPD's General Order 3-12 requires the Audit and Compliance Unit to conduct such audit.

According to staff, they did not conduct the audit due to their relocation to a new facility. Non-compliance with the CALEA Standards could lead to losing accreditation.

Recommendation:

- 8. We recommend the Deputy Chief of Business Services ensure the annual audit is conducted in compliance with CALEA standards.***

Finding #7 – Firearms Disposal

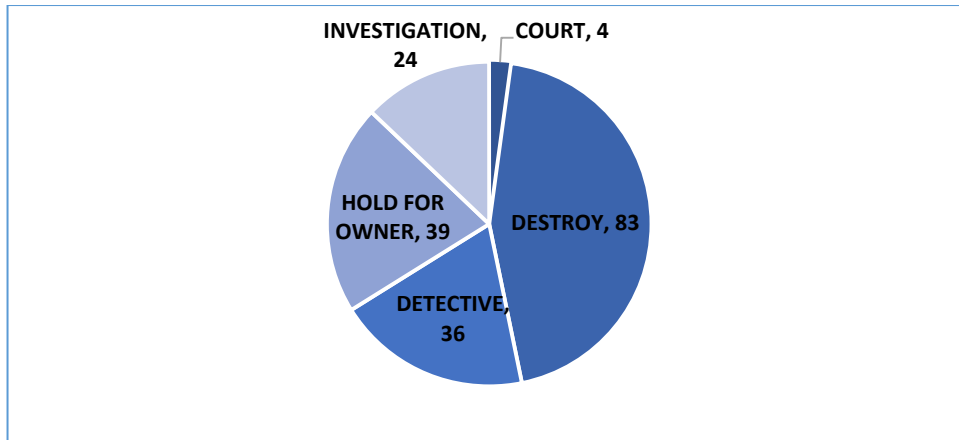
The P&E Unit did not conduct the annual Firearms Disposal. According to Department's internal Policy, General Order 2-8, the P&E Unit must dispose of Firearms annually. According to staff, the disposal was not conducted due to the relocation of the P&E Unit to the new facility. Additionally, according to the IAPE, Standards 11.10, "Firearms should be destroyed to prevent its illegal use at some time in the future."

Recommendation:

- 9. We recommend the Deputy Chief of Business Services ensure compliance with the General Order mandate to dispose of Firearms annually.***

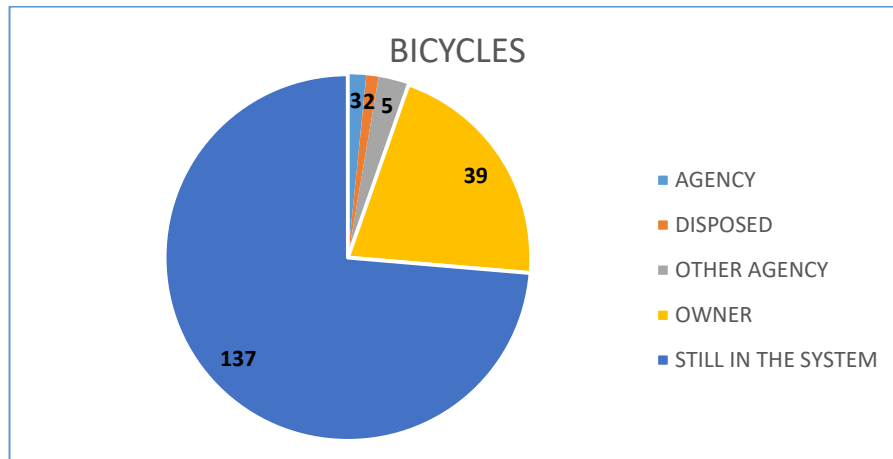
Finding #8 – Bicycle Inventory

The auditors noted the P&E Unit did not dispose of bicycles as permitted by State Code. During calendar year 2018, the P&E Unit received 186 bicycles. The chart below represents the officers' instruction codes for the bikes at the time of entry into the P&E Unit:



Source: prepared by auditor

As of December 31, 2018, only 49 of those bicycles were removed from the property and evidence inventory as depicted in the chart below:

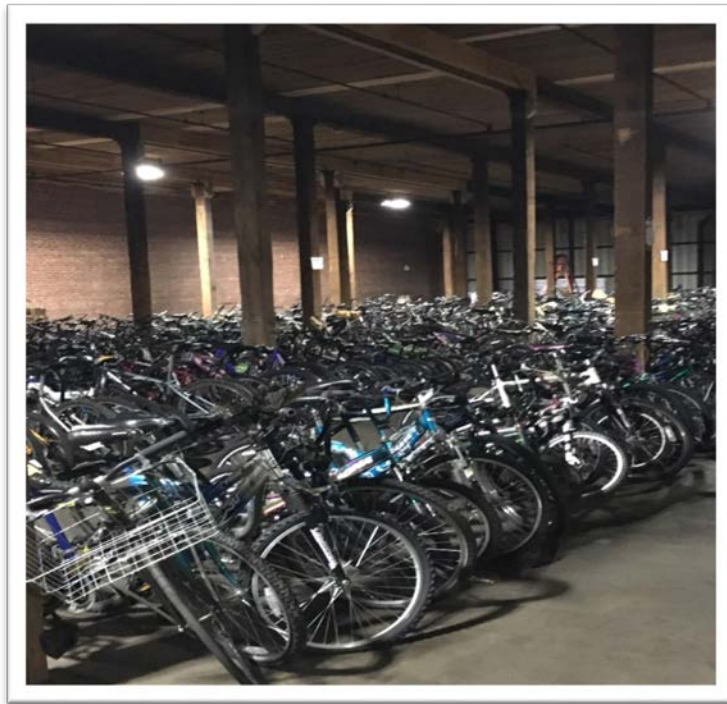


Source: prepared by auditor

The Virginia Code §15.2-1720 states “Any locality may, by ordinance, (i) provide for the public sale or donation to a charitable organization of any bicycle, electric personal assistive mobility device, electric power-assisted bicycle, or moped that has been in the possession of the police or sheriff's department, unclaimed, for more than thirty days...”

The auditors noted the P&E Unit did not actively reach out to nonprofit organizations to donate unclaimed bicycles. They also had the option to hold a public sale, but one was not held.

Untimely disposals have resulted in a large inventory of bicycles that occupy a large space in the warehouse. The picture below depicts some of the bicycles held in inventory.



Source: prepared by auditor

Recommendation:

- 10. We recommend the Property and Evidence Unit Officer in Charge enforce Virginia Code §15.2-1720 to dispose timely of unclaimed bicycles that are not claimed for more than 30 days in a timely manner.***

Finding #9 – Update Standard Operating Manual

The P&E Unit's Operating Manual has not been updated since July 2013. Since that date, the Unit has gone through various changes of command (Officer in Charge position) as well as moving to a new facility.

According to the CALEA Standards, a written direction establishes procedures for receiving all in-custody and evidentiary property obtained by employees into the P&E Unit. Written policies

and procedures provide guidance to employees to perform their duties consistently in conformance with policies. In addition, they can be used as an effective employee-training tool. The auditors noted the OIC took command of the Unit in November 2017. Since taking command, the P&E Unit moved to a new facility and management had to prioritize the needs of moving to a new facility. An updated Operating Manual can assist management in evaluating compliance.

Recommendation:

- 11. We recommend the Officer in Charge of the Property and Evidence Unit update their Operating Manual to reflect the current work environment.***

Finding #10 – Update Substance Abuse Policy

The RPD's Substance Abuse Policy does not reflect the Central Human Resources Department's (HR) Policy. Central HR's Policy references a sensitive pool that includes RPD's personnel whereas RPD's Policy references a high-risk pool for selected personnel. According to General Order 4-3, "In all matters relative to alcohol abuse and illegal drug use in the workplace, the Richmond Police Department and its employees will conform to and be governed by the provisions of the City of Richmond's Substance Abuse Policy, Administrative Regulation number 4053".

According to staff, the departure of the former Chief of Police delayed the review of their Policy. RPD staff acknowledged the General Orders had not been updated to reflect Central HR's Policy and indicated the Policy is currently under review. Without properly updated written policies and procedures, compliance cannot be evaluated. Additionally, conflicting information would create confusion to those enforcing the Policy.

Recommendation:

- 12. We recommend the Police Human Resources Division Chief update the Substance Abuse Policy to reflect the Citywide Substance Abuse Policy.***

APPENDIX A: MANAGEMENT RESPONSE FORM
2019-12 RPD Property and Evidence Unit audit

#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
1	We recommend the Police Deputy Chief of Business Service implement a Business Continuity Plan that identifies the critical operational areas within the Property and Evidence Unit. The Plan should at least include installing a generator to ensure continuous power supply for the refrigerators.	Y	Refrigeration: Primary backup is the cooler at the RPD Forensics Unit located at Police Headquarters. Secondary backup is the cooler at the VA Forensics Department State Lab 4th and Jackson Street. During actual electrical power outage paper system backup will be utilized. Update of the Property & Evidence Operations Manual will address these subjects.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		07/26/19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
2	We recommend the Police Deputy Chief of Business Services install a secondary barrier inside the warehouse.	Y	Revise plans, Request quote, Install fencing. - While concurring this needs to be done, RPD mentioned that this, and other items such as additional cameras (#3), needed to be done in the initial briefing.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		8/15/19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	Plans obtained. Currently under revision.		
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
3	We recommend the Police Deputy Chief of Business Services install security cameras in the Drugs and Firearms Rooms.	Y	
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
			Video cameras have been installed in drug & firearms rooms.
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
4	We recommend the Police Deputy Chief of Business Services establish a formal process to test the cameras on a periodic basis to ensure they are functioning and recording as intended.	Y	Developing a plan to review 25% of the camera footage every week. This will provide a 100% every month. Current system has a recording indicator for each camera on the monitor.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		31-Jul-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION

APPENDIX A: MANAGEMENT RESPONSE FORM
2019-12 RPD Property and Evidence Unit audit

#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
5	We recommend the Police Deputy Chief of Business Services ensure the camera viewing the Drugs and Firearms Rooms are set to record and retain footage.	Y	All Cameras at the Property and Evidence Facility shall continually record and video footage shall be retained for a period of thirty (30) days.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Information Services Manager		20-May-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	Completed		Video Storage Capacity has been expanded to accommodate extended storage of Property and Evidence Cameras. Technical issues causing the intermittent drop off of recordings have been corrected.
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
6	We recommend the Police Deputy Chief of Business Services establish formal procedures to deactivate and monitor deactivation of all separated employees from all buildings and systems.	Y	The Deactivation of access to the Property and Evidence facility has been added to the Computer services Access Procedures.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Information Services Manager		3-Jun-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	In Progress		1) Access to all facilities including Property and Evidence shall be removed when an employee separates from the Department. 2) Monthly checks of access rights to all systems including Property and Evidence are conducted on the first Monday of the Month. 3) Access rights to RPD facilities are granted or removed based on change of duty assignment (PD162).

APPENDIX A: MANAGEMENT RESPONSE FORM
2019-12 RPD Property and Evidence Unit audit

#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
7	We recommend the Police Deputy Chief of Business Services establish formal procedures to communicate with the Property and Evidence Unit to deactivate separated employees from the TraQ System.	Y	Communication Procedure for the Deactivation of access rights to the Property and Evidence Facility will be established
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	Information Services Manager		3-Jun-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	In Progress		A written (Email) confirmation of the granting or elimination of access rights to the property and evidence Lieutenant and Srgeant shall be provided based on the following criteria 1) Request for the granting or removal of access to the Property and Evidence Facility by the Chief of Police, Deputy Chief of Business Services, Property and Evidence Lieutenant or Property and Evidence Sergeant. 2) Employee Separation from the Police Department, 3)Employee re assignment.
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
8	We recommend the Deputy Chief of Business Services ensure the annual audit is conducted in compliance with CALEA standards.	Y	Working on establishing an annual timeframe in which the annual audit is conducted.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		31-Jul-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
9	We recommend the Deputy Chief of Business Services ensure compliance with the General Order mandate to dispose of Firearms annually.	N	G.O. 2-8, Administrative Reporting Systems, There is neither a departmental policy nor a CALEA standard to annually dispose of firearms. While is an annual practice to do so, RPD intentionally did not conduct one in 2018 so that it could focus resources on the relocation of the Property and Evidence Unit. A-PD 132 will be submitted to remove the term "Annually" from the frequency column and replace with "NA". Auditor's Comment: This matter was brought to the attention of management as it was shown on pg. 8 of General Order 2-8 for annual disposition.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	Eligible weapons not done due to move.		On - going (05/18/2019)

APPENDIX A: MANAGEMENT RESPONSE FORM
2019-12 RPD Property and Evidence Unit audit

#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
10	We recommend the Property and Evidence Unit Officer in Charge enforce Virginia Code §15.2-1720 to dispose timely of unclaimed bicycles that are not claimed for more than 30 days in a timely manner.	N	Cited code states, "Any locality may, by ordinance..." provide for public sale or donation unclaimed bikes over 30 days. There is not a requirement to do so. While the RPD has done so on a regular basis, It was not done in 2018 so that resources could be dedicated to the relocation of the Property and Evidence Unit. Bicycles having met legal qualifications have been donated in May 2019. Auditor's Comment: This matter was brought to the attention of management to reduce the inventory of unclaimed bicycles
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	Eligible bikes not done due to move.		On - going
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
11	We recommend the Officer in Charge of the Property and Evidence Unit update their Operating Manual to reflect the current work environment.	Y	Review Current Manual, Update to match current processes, Include Business Continuity Plan. Request alternate power source in CIP.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	OIC, Property and Evidence Unit		31-Jul-19
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
#	RECOMMENDATION	CONCUR Y/N	ACTION STEPS
12	We recommend the Police Human Resources Division Chief update the Substance Abuse Policy to reflect the Citywide Substance Abuse Policy.	Y	RPDHR Chief submitted changes to remove the high risk pool note from department General Order 4-3 on 5/20/19. Policy language will now align with City Administrative Regulation.
	TITLE OF RESPONSIBLE PERSON		TARGET DATE
	IF IN PROGRESS, EXPLAIN ANY DELAYS		IF IMPLEMENTED, DETAILS OF IMPLEMENTATION
	In Progress		A PD-132 was submitted to the Police Planning Unit to remove the term "high risk pool" from General Order 4-3.