CITY OF SAN ANTONIO

November 16, 2022

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SUBJECT: Audit Report of Audit of San Antonio Fire Department Arson Bureau

Mayor and Council Members:

We are pleased to send you the final report of the Audit of San Antonio Fire Department Arson Bureau. This audit began in January 2022 and concluded with an exit meeting with department management in July 2022. Management's verbatim response is included in Appendix B of the report. The San Antonio Fire 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,

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

Distribution:
Erik Walsh, City Manager
María Villagómez, Deputy City Manager
Ben Gorzell, Chief Financial Officer
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Judy Treviño, Audit Committee Member

CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR

Audit of San Antonio Fire Department

Arson Bureau

Project No. AU22-018

November 16, 2022

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 the San Antonio Fire Department (SAFD), specifically the Arson Bureau (Bureau). The audit objectives, conclusions, and recommendations follow:

Determine if Arson Bureau operations comply with policies and procedures and whether case management is effective and timely.

The Bureau is effectively managing its case load in a timely manner. It is also effectively managing its equipment inventory and tracking its case closure rate. However, the Bureau's evidence inventory is inaccurate, employee access to the evidence tracking software system is not always appropriate, and the temporary evidence room is lacking a security camera. Additionally, the Bureau's policies and procedures are still in draft mode and are incomplete.

We recommend that the Fire Chief:

- Conduct a full inventory of the Bureau's evidence locations, purge evidence that is no longer needed and items that are not evidence, and develop and implement policies and procedures for evidence handling in accordance with standards promulgated by the International Association of Property and Evidence, Inc.
- Install a surveillance camera in the Arson Temporary Evidence Locker and develop and implement a policy for periodic review of video footage.
- Define and implement FileOnQ roles that are appropriate for the duties of Bureau employees and conform to the principle of least privilege. Also, conduct periodic reviews of FileOnQ users to ensure only current Arson employees have access.
- Develop, approve, and implement policies and procedures that ensure the Bureau's processes conform with laws, regulations, and best practices for both firefighting and police operations.
- Develop and implement policies and procedures for addressing complaints against arson investigators.
- Develop tracking performance metrics that reflect the entirety of the Bureau's responsibilities.

SAFD Management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix B on page 12.

Table of Contents

Background

The Arson Bureau (Bureau) is responsible for investigating the cause of fires and explosions within the city limits of San Antonio. It also investigates fire-related deaths, life threatening burn injuries, suspected explosive devices, and bomb threats.

Fire investigations are often divided into two parts: 1) determining the cause of the fire; and, 2) if the cause is arson, conducting a criminal investigation to bring the perpetrator(s) to justice. In October 2020, the SAFD Fire Investigation Unit was created to assist the Bureau. It uses fire fighters that are not police officers, but who are trained in determining the cause of fires. This unit deploys with firefighters to determine the cause of structure fires and help fire fighters understand what evidence should be preserved if possible.

> **TEXAS PENAL CODE 28.02 ARSON**
> A person commits an offense if he starts a fire or causes an explosion with intent to destroy or damage: any vegetation, fence, or structure on open-space land; or any building, habitation, or vehicle: knowing that it is within the city limits of an incorporated city or town; knowing that it is insured against damage or destruction; knowing that it is subject to a mortgage or other security interest; knowing that it is located on property belonging to another; knowing that it has located within it property belonging to another; or when he is reckless about whether the burning or explosion will endanger the life of some individual or the safety of the property of another.

Bureau investigators determine the cause of vehicle fires and more complex cases of structure fires. Bureau investigators are fire fighters, certified arson investigators, and certified peace officers. They are the only SAFD members involved in conducting criminal investigations once the cause of a fire is established as arson. They are responsible for filing cases with the Bexar County Criminal District Attorney's Office for arson and related crimes such as criminal mischief, possession of explosive devices, hoax bombs, insurance fraud, and homicide.

Arson cases are typically difficult to solve because very often, the evidence literally burns up. The most recently available arson case clearance rate (the number of cases cleared divided by total cases) for all US reporting agencies is from calendar year (CY) 2019 and is 23.8% (out of a population of 32,981 reported arson offenses), according to the Federal Bureau of Investigation (FBI). According to the Texas Department of Public Safety (TxDPS), the agency that compiles and publishes this information in more detail for the state, the Bureau's clearance rate that year was 13.25% (24 cases out of 181 arson cases were cleared). Clearance rates vary significantly from year to year.

At the time of the audit, the Bureau was staffed with two Fire Lieutenants, 10 Fire Engineers (Arson Investigators), and one Administrative Assistant. The Bureau's fiscal year (FY) 2022 budget totals $2,367,301.

Audit Scope and Methodology

The audit scope was October 1, 2020 through January 31, 2022 as well as current practices and conditions.

We interviewed Bureau staff; conducted physical inventory tests; reviewed draft policies and procedures and state laws and regulations; tested calculations of performance measures; and tested user access to the evidence tracking software. Testing criteria included Bureau draft policies and procedures, City administrative directives, and best business practices including standards promulgated by the International Association of Property and Evidence, Inc.

We assessed internal controls relevant to the audit objective. This included a review of draft policies and procedures and controls over inventory storage and issuance; prisoner transport; evidence intake, storage, and transfer; user access and privileges to the evidence tracking software; use of body-worn cameras; training of investigators; and investigator safety.

We relied on computer-processed data in the City's evidence tracking software system FileOnQ to test inventory and assess user access and privileges. Our reliance was based on performing direct tests on the data rather than evaluating the system's general and application controls. Our direct testing included: 1) comparing the contents of FileOnQ for the "Temporary Evidence Locker" and "Out to Lab" locations to the actual contents of the Arson Temporary Evidence Locker; 2) comparing the list of active SAFD users against the list of Bureau personnel, and 3) reviewing the privileges conferred by user profiles to their actual duty requirements. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We also relied on computer-processed data in the City's police case management system Mark43. This system contains all SAPD and Bureau police reports. We used the system to determine when police reports were initiated, reviewed by superiors, and when arrests were made. This system is controlled by SAPD's IT Services. As such, general and application controls were beyond the scope of this engagement. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

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 findings and conclusions based on our audit objectives.

Audit Results and Recommendations

The Arson Bureau (Bureau) is effectively managing its cases. The Bureau recently began using Mark43, the San Antonio Police Department's (SAPD) case management system. We found that cases in Mark43 created by Arson and Fire Investigators are created in a timely manner, reviewed by supervisors appropriately, and closed properly.

The Bureau is also complying with its draft policies and procedures regarding the inventory of ammunition, equipment, and weapons. Controls are in place to ensure these items are properly ordered, received, stored, and issued to investigators. We tested the inventory of equipment, weapons, and ammunition stored in various locations throughout the Bureau's offices and found it all to be properly recorded. Personnel are required to sign and date forms acknowledging equipment issued to them, and a Lieutenant conducts inventories regularly.

However, controls over the Arson Temporary Evidence Locker and the evidence tracking software FileOnQ are inadequate. Additionally, existing policies and procedures are still in draft form and are incomplete.

A. Arson Temporary Evidence Locker Contents

The evidence listed in FileOnQ does not match the actual evidence located in the Arson Temporary Evidence Locker.

The Bureau offices include a storage closet designated as the Arson Temporary Evidence Locker. This is a location intended to temporarily store evidence brought back by investigators directly from the fire scene. This evidence may need to be sent to a state lab for analysis or be transferred to the main SAPD property and evidence room after return from the state lab. The room also currently holds: 1) a computer for accessing FileOnQ and printing evidence labels; 2) evidence collection supplies; and 3) several metal lockers that store long guns and a variety of ammunition.

Evidence is appropriately stored in brown paper bags, metal cans, or plastic zipper bags. Larger items, such as computer hard drives or fireworks may be boxed or the label may be placed on the item itself. Most packages also had a label generated from FileOnQ with the case number, a bar code that is used to find it in FileOnQ, the item description, serial number (if applicable), and the suspect status (if any).

We performed a complete inventory of the items of evidence and evidence-like objects stored in the Arson Temporary Evidence Locker. We found significant

discrepancies between what was stored in the room and what FileOnQ listed as being stored either in the Arson Temporary Evidence Locker or "Out to Lab." We also found that most items in the Arson Temporary Evidence Locker had a label, but some did not.

We identified 260 containers of evidence that were physically located in the Arson Temporary Evidence Locker. Of those, 12% (31 items) did not have a label with a barcode or even a handwritten notation of the associated case number and could not be matched to an entry in FileOnQ.

Additionally, FileOnQ listed 336 items that should have been located in the Arson Temporary Evidence Locker. Of these, we could only locate 169 items (about half). Specifically, we determined the following:

Number of Items	% of Total	Description
169	50%	Items found in the Arson Temporary Evidence Locker
58	17%	Items for which the retention period had expired, and the item was not in the Arson Temporary Evidence Locker
42	13%	Items for which the Legal Hold had not yet expired, and the item was not in the Arson Temporary Evidence Locker
26	8%	Items that were still within the retention period and the item was not in the Arson Temporary Evidence Locker.
20	6%	Items that were marked as "approved for destruction" and the item was not in the Arson Temporary Evidence Locker.
17	5%	Items that had no retention period specified and the item was not in the Arson Temporary Evidence Locker.
3	1%	Items that are potential matches for items in the Arson Temporary Evidence Locker that did not have a barcode.
1	<1%	Item which was listed as stored in the Arson Temp Locker but had a note in FileOnQ saying it was in the Lt's desk, and it was found in the Lt's desk.
336	100%	Total items in the FileOnQ listing

Source: Auditor observation and FileOnQ

The International Association for Property and Evidence, Inc. (IAPE) is a non-profit organization created by and for law enforcement professionals to establish property and evidence standards. The IAPE publishes these professional standards and makes them available to the public through its website.[1] These standards recommend law enforcement agencies:

- Use property reports to identify the owner/finder/suspect/victim, describe the property, and track items to document the chain of custody.
- Label every evidence package with an identifier (e.g., case number, item number, etc.) that matches the item to the property/evidence report (e.g., evidence tag, property receipt, etc.).

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[1] https://home.iape.org/evidence-resources/iape-documents.html

- Segregate found property and property for safekeeping (neither is evidence) from items of general evidence.
- Conduct an inventory annually or whenever a change in key-holding personnel or in the person in charge is made.
- Conduct comprehensive audits at least annually and conduct supervisory inspections of the property room regularly.

Items in the Arson Temporary Evidence Locker may lack a label because they were not entered into FileOnQ or because it was recorded in FileOnQ, but the investigator forgot to print a label and attach it to the evidence. It is also possible that items were brought back from the scene of a fire but were not considered evidence (the case was ruled accidental, etc.). When evidence doesn't have a proper label, it may become difficult to find for trial or may be accidentally destroyed before a case goes to trial. Additionally, if the evidence is not entered into FileOnQ or if its location is not accurately tracked as it moves from one location to another, the chain of custody may be called into question at trial. Finally, when retention periods are not correctly entered into FileOnQ and relied on to purge inventory, evidence that is still needed may be inappropriately destroyed and evidence that is no longer needed may not be purged timely to free up storage space.

We also noted that some evidence had been in the Arson Temporary Evidence Locker for several years. This room is intended to be for temporary storage only. Items were kept long-term in the Arson Temporary Evidence Locker because the Bureau's allocated space at the main SAPD Property and Evidence facility was full.

Recommendations

The Fire Chief should:
- Conduct a full audit of all Arson Bureau evidence locations, purge unnecessary evidence and non-evidence from the inventory, and update FileOnQ records to match the actual physical inventory.
- Require that all evidence is appropriately packaged and labeled upon initial entry into any of the Bureau's evidence storage locations.
- Require that items that are not evidence be stored separately from evidence items or purged if appropriate.
- Require that all evidence records in FileOnQ have appropriate retention dates added so that the system will notify users when it is time to purge old evidence.
- Conduct periodic inventories and audits, on a sample basis, to ensure policies and procedures are being followed.
- Work with SAPD experts to develop and implement strong policies and procedures for evidence handling and storage that comply with IAPE standards.

B. Arson Temporary Evidence Locker Physical Security

The Arson Temporary Evidence Locker is lacking security camera surveillance.

We examined the physical security of the Arson Temporary Evidence Locker. It is a storage closet within the Bureau's offices on the second floor of the City's Public Safety Headquarters building. Entry past the lobby of the building is controlled by guards. The second floor requires badge access to get past its lobby. Additionally, the Bureau's offices require badge access. The closet itself is also badge access controlled. Thus, it is unlikely that unauthorized personnel would be able to access this room.

However, the room does not have a security camera installed, so there is no means of safeguarding the evidence from an inside threat or to protect the investigators from accusations of malfeasance in handling criminal evidence. The IAPE recommends using surveillance cameras whenever "enhanced security of a long-term record of ingress, movement, and egress is desired."

Recommendation

The Fire Chief should work with ITSD to install a security camera in the Arson Temporary Evidence Locker and develop and implement a policy and procedure that sets an appropriate video retention period and requires a periodic review of video footage to ensure it is working as intended.

C. FileOnQ User Access and Privileges

User access for FileOnQ is not routinely terminated when SAFD employees leave the Bureau and privileges given to some Bureau employees are not appropriate.

We obtained the list of all SAFD users of FileOnQ and compared it to the list of current Bureau employees. We found 11 fire fighters with FileOnQ privileges that are not part of the Bureau. Additionally, one member of the Bureau no longer needs access to FileOnQ because his duties have changed, and he no longer works criminal cases. Personnel with no involvement in criminal cases do not need access to FileOnQ.

We also tested whether Bureau employees had appropriate privileges in FileOnQ. Administrative Directive 7.8d "Access Control" states:
- "Access to COSA assets is based on an individual's membership in a group, job function and/or role in their assigned City department. Access permissions will use the principle of least privilege. All other access requires justification and approval."

- "Local, physical and/or remote access controls will be periodically reviewed for validity by ITSD, COSA department(s) and or application owners."

While employees all had privileges based on group roles defined in FileOnQ, employees with the same job title and job duties were not granted the same roles. Additionally, the defined roles had excessive privileges. For example, there are two Lieutenants in the Bureau, but one was assigned to the General User Group and the other to the Arson User Group. Additionally, seven Bureau investigators have the Arson User Group role, which gives them the ability to make edits to evidence records (except for quantity), sign out evidence, or transfer evidence to another location. These privileges should be restricted to the Lieutenants and the Administrative Assistant (who acts as the Bureau's FileOnQ administrator). Having too many personnel with these privileges heightens the risk that evidence will be mismanaged. Although there is a log indicating who did what to the evidence that can be used to facilitate accountability, it is better to prevent problems before they occur.

Recommendations

The Fire Chief should:
- Work with ITSD and SAPD experts to define and implement FileOnQ roles that match the privileges granted users to the duties of those users based on the principle of least privilege.
- Periodically review SAFD users of FileOnQ to ensure that employees that leave the Bureau have their privileges revoked in a timely manner.

D. Policies and Procedures

The Bureau's policies and procedures have not been formally approved or implemented and are not yet comprehensive.

Formal policies and procedures help to standardize processes among all personnel of the Bureau, promote effective and efficient practices, facilitate conformity to best practices, and ensure there are safeguards implemented over critical processes.

Recommendation

The Fire Chief should develop, approve, and implement policies and procedures to ensure that the Bureau's significant processes are handled consistently and in accordance with laws, regulations, and best practices for both firefighting and police operations.

E. Complaints Against Investigators

Policies and procedures for addressing complaints against Bureau investigators have not been developed.

Currently there are only high-level policies and procedures for addressing performance issues among SAFD personnel called the "Personnel Management Procedure." Its purpose is "to provide guidance to Supervisors so that they may effectively address inappropriate behavior and/or substandard performance before it becomes a serious problem." It does not specifically address how complaints from citizens or other outside parties should be addressed.

The Bureau reports it has not yet received any serious complaints against its investigators. However, as peace officers with arrest powers and firearms, Bureau personnel are at heightened risk of complaints from the public compared to firefighters who are not peace officers. An independent investigative process for serious complaints against Bureau investigators would help ensure public trust and protect Bureau investigators from spurious complaints.

The SAPD has extensive experience in dealing with public complaints against its officers. Its policies and procedures divide complaints into two categories – line complaints, which are minor in nature, and formal complaints, which are serious in nature. Line complaints are handled similarly to the procedures described in the SAFD Personnel Management Procedure. Formal complaints against SAPD officers are investigated by SAPD's Internal Affairs unit.

Additionally, the firefighter's collective bargaining agreement (CBA) specifies that firefighters cannot be disciplined for any act that occurred more than 180 days prior to the date the Chief knew (or should have known) of the act and no discipline can be issued for an act that occurred more than two years prior to the date the Chief knew or should have known of the act, unless the fire fighter is indicted for a felony or officially charged with a Class A or B misdemeanor. The current SAFD policies and procedures do not address these requirements, making it difficult for SAFD management and personnel to ensure compliance with the CBA.

Prompt resolution of complaints against firefighters and Bureau investigators is essential for ensuring complaints (and possibly improper behavior) are quickly resolved as well as conformity with the CBA.

Recommendation

The Fire Chief should develop formal policies and procedures for addressing complaints against Bureau investigators in conformity with the SAFD collective bargaining agreement.

F. Performance Metrics

Currently, the Bureau uses a single performance metric to assess its effectiveness, the Case Closure Rate, and there are no policies and procedures describing how it should be calculated. It also does not reflect the entirety of the Bureau's case load.

The Bureau defines the case closure rate as the number of arson cases that are closed by arrest, by issuing an arrest warrant, or are filed "at-large" (the suspect is not yet in custody) with the DA divided by the total number of arson cases. In CY 2021, its case closure rate was 26% (76 out of 289 arson cases).

The Federal Bureau of Investigation (FBI) uses a similar clearance rate measure for its Uniform Crime Reporting (UCR) Program. The Texas Department of Public Safety (TxDPS) also uses the FBI's UCR definition. However, the FBI (and TxDPS) defines case clearance as:

$$\frac{\text{arson cases cleared by arrest} + \text{arson cases cleared by exception}}{\text{total arson cases}}$$

Cases that are cleared by exception are cases for which there are elements beyond law enforcement's control that prevent it from arresting and formally charging the offender. This includes, but is not limited to, the death of the suspect, victim refusal to cooperate after the offender is identified, or denial of extradition.

The Bureau does not include cases closed by exception in its measure but does include those for which no arrest was made but for which a suspect has been identified. Thus, the Bureau's performance measure should not be used for comparison with that of other jurisdictions who use the FBI's definition, as they are calculated differently. Without formal policies and procedures documenting the differences between the two measures, invalid comparisons may result.

The most recent year the FBI has published UCR data is CY 2019. TxDPS has published UCR data for both CY 2019 and CY 2020, as seen in the table below:

Population Group	Arson Case Clearance Rate	
	CY 2019	CY 2020
All Reporting Agencies[2]	23.8%	Not available
Cities with population 1m and over[2]	12.7%	Not available
Texas[3]	18.0%	15.6%
San Antonio[4]	13.25%	10.17%

[2] Source: FBI Uniform Crime Report 2019 and 2020.
[3] TxDPS "Crime in Texas" Report 2019 and 2020.
[4] FBI website "Crime Data Explorer" https://crime-data-explorer.app.cloud.gov/pages/explorer/crime/crime-trend

Additionally, the Bureau handles more than just arson cases. It is responsible for investigating fires for which a cause cannot be determined by the fire investigators, and it files cases for criminal mischief, possession of explosive devices, hoax bombs, insurance fraud, and homicide, among others. Its case load also includes cases for which it turns out that no crime was committed (accidental, unfounded, etc.). Thus, the single measure the Bureau tracks (Arson Case Closure) does not reflect the full scope of its duties.

Management may not have a good understanding of the performance of the Bureau in its entirety without appropriate and meaningful measures. Such measures would aid in making informed decisions regarding staffing, training needs, effectiveness, efficiency, etc.

Recommendations

The Fire Chief should:
- Develop a suite of performance metrics that reflect the range of duties performed by the Bureau and document the definition and calculation methodology for these metrics in formal policies and procedures.
- Compare the performance of the Bureau to other jurisdictions using measures for which the metric is similarly calculated.

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Susan Van Hoozer, CIA, CISA, Auditor in Charge
Michael Gutierrez, Auditor

Appendix B – Management Response

CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

November 3, 2022

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

RE: Management's Corrective Action Plan for Audit of San Antonio Fire Department Arson Bureau

The San Antonio Fire Department has reviewed the audit report and has developed the Corrective Action Plan below corresponding to the report recommendation.

		Recommendation			
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
A	**Arson Temporary Evidence Locker Contents** The Fire Chief should: • Conduct a full audit of all Arson Bureau evidence locations, purge unnecessary evidence and non-evidence from the inventory, and update FileOnQ records to match the actual physical inventory. • Require that all evidence is appropriately packaged and labeled upon initial entry into any of the Bureau's evidence storage locations. • Require that items that are not evidence be stored separately from evidence items or purged if appropriate. • Require that all evidence records in FileOnQ have appropriate retention dates added so that the system will notify users when it is time to purge old evidence. • Conduct periodic inventories and audits, on a sample basis, to ensure policies and procedures are being followed. • Work with SAPD experts to develop and implement strong policies and procedures for evidence handling and storage that comply with IAPE standards.	5	A	Division Chief Douglas Berry	August 31, 2022

Appendix B – Management Response (continued)

		Recommendation			
#	**Description**	**Audit Report Page**	**Accept, Decline**	**Responsible Person's Name/Title**	**Completion Date**
	Action plan: • The Arson Division completed a full audit of all physical evidence, an electronic audit of all inventory and updated fileOnQ to match physical inventory on August31, 2022. All evidence was reconciled and accounted for to include items eligible for destruction. • An "Evidence Collection, Handling and Initial Storage" Procedure was created on July 2022 that captures the processes for packaging, labeling, and entering evidence on FileOnQ. This procedure also captures processes on how to handle items that are not considered evidence. This procedure was incorporated into the General Manual and issued to all Arson Investigators on July 25, 2022. • Retention Times for all evidence were audited on July 14, 2022 in FileOnQ. On August 31, 2022, appropriate retention times were assigned and or verified against evidence. Moving forward, the Arson Division will conduct annual audits of the entire evidence system to include FileOnQ retention times and physical inventory. • The Arson temporary locker is being audited weekly since July 14, 2022. The entire evidence system to include FileOnQ retention times and physical inventory will be audited annually. • On March 17, 2022, Arson supervisors met with SAPD Evidence Room Supervisors to develop and implement strong policies and procedures for evidence handling and storage that comply with International Association for Property and Evidence (IAPE) standards. Arson utilized the IAPE standard in the development of the "Evidence collection, Handling and initial Storage" Procedure mentioned above. • Arson will meet annually with SAPD Evidence Room Supervisors to ensure Arson is utilizing the most up-to-date standards regarding evidence handling and storage.				
B	**Arson Temporary Evidence Locker Contents** The Fire Chief should work with ITSD to install a security camera in the Arson Temporary Evidence Locker and develop and implement a policy and procedure that sets an appropriate video retention period and requires a periodic review of video footage to ensure it is working as intended.	6	A	Division Chief Douglas Berry	March 1, 2023
	Action plan: • Security cameras and software have been ordered. Once cameras and software are delivered, installation is anticipated to be completed in two months. Appropriate policies and procedures will be written as soon as the cameras are installed to ensure cameras' functionality and available features are captured.				

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Appendix B – Management Response (continued)

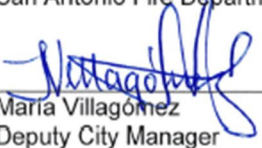|	Recommendation				
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
C	**FileOnQ User Access and Privileges** The Fire Chief should: • Work with ITSD and SAPD experts to define and implement FileOnQ roles that match the privileges granted users to the duties of those users based on the principle of least privilege. • Periodically review SAFD users of FileOnQ to ensure that employees that leave the Bureau have their privileges revoked in a timely manner.	7	A	Division Chief Douglas Berry	July 25, 2022
	Action plan: • Arson Procedure "Evidence collection, Handling and initial Storage" was finalized on July 14, 2022 and includes the roles and responsibilities of all users. The principle of least privilege will be adhered to per the policy. This procedure was incorporated in the General Manual and issued to Arson Investigators on July 25, 2022. • Arson will conduct an annual review of all SAFD users of FileOnQ to ensure that employees that leave the Bureau have their privileges revoked in a timely manner. As of July 25, 2022 revoking fileOnQ privileges is included as part of the out processing for any investigator that transfers out or leaves the Arson Bureau.				
D	**Policies and Procedures** The Fire Chief should develop, approve, and implement policies and procedures to ensure that the Bureau's significant processes are handled consistently and in accordance with laws, regulations, and best practices for both firefighting and police operations.	7	A	Division Chief Douglas Berry	July 25, 2022
	Action plan: • All investigators follow the SAFD Rules and regulations as well as the Arson General Manual which covers best practices for police operations. The Arson General Manual was completed to incorporate the recommended policies and procedures on July 25, 2022.				
E	**Complaints Against Investigators** The Fire Chief should develop formal policies and procedures for addressing complaints against Bureau investigators in conformity with the SAFD collective bargaining agreement.	8	A	Division Chief Douglas Berry	Dec. 31, 2022
	Action plan: • The Arson Division had developed a procedure for handling complaints made against an Arson Investigator. This procedure is currently being reviewed and will be incorporated into the Arson General Manual in November 2022 and will be issued to Arson Investigators in December 2022.				

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Appendix B – Management Response (continued)

#	Recommendation				
	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
F	**Performance Metrics** The Fire Chief should: • Develop a suite of performance metrics that reflect the range of duties performed by the Bureau and document the definition and calculation methodology for these metrics in formal policies and procedures. • Compare the performance of the Bureau to other jurisdictions using measures for which the metric is similarly calculated.	10	A	Division Chief Douglas Berry	March 30, 2023
	Action plan: • The Planning Division of the Fire Department will review best practices and survey other jurisdictions in other to develop a suite of performance metrics that reflect the duties performed by the Arson Bureau. • A Quarterly report will be prepared and provided to the Fire Chief and select metrics will be incorporated into the Fire Department Annual Report.				

We are committed to addressing the recommendation in the audit report and the plan of action presented above.

Sincerely,

_____   11/3/22
Charles N. Hood   Date
Fire Chief
San Antonio Fire Department

_____   11/3/2022
María Villagómez   Date
Deputy City Manager
City Manager's Office

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