

3. Acceptance of the Office of the City Auditor Report AU25-029 Audit of San Antonio Police Department - Mark43 System [Buddy Vargas, City Auditor]

**CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR**

SAN ANTONIO POLICE DEPARTMENT
AUDIT OF MARK43 SYSTEM
PROJECT NO. AU25-029
APRIL 24, 2025

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CITY AUDITOR



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Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the San Antonio Police Department (SAPD), specifically the Mark43 system. The audit objectives, conclusions, and recommendation follow:

Determine if:

- Incident reports within the Mark43 system are adequately reviewed and approved.
- System controls surrounding user access and segregation of duties are adequate.

SAPD is adequately completing, reviewing, and approving incident reports within the Mark43 system. SAPD has developed and established sufficient standard procedures for crime reporting. Staff are appropriately reviewing incident reports to ensure offenses are accurately recorded with the appropriate information. Additionally, the SAPD is reporting crime data according to National Incident Based Reporting System (NIBRS) standards.

However, processes and controls could be improved for user access administration, specifically for separated users.

We recommend the Chief of Police strengthen controls for Mark43 user access by developing and implementing a process for timely notification of separated users to ensure the accounts are disabled promptly. Also, a periodic access review of all enabled users should be developed and implemented.

We provided a recommendation to management to strengthen controls and resolve the identified issue. SAPD management agreed with the audit finding and has developed positive action plans to address the issue. Management's verbatim response is in Appendix B on page 7.

Background

The primary responsibility of the Police Department's Uniform Crime Reporting (UCR) Office is to provide the Chief of Police, the Command Staff, and all levels of SAPD personnel with UCR information and analysis. The UCR Office uses the Mark43 records management system (RMS) to review and compile all crime statistics and offenses included in police incident reports. The SAPD began using this system November 1, 2020. For our scope period of September through December 2024, the following number of incident reports were completed:

| Month | Number of Incident Reports |
|----------------|----------------------------|
| September 2024 | 11,073 |
| October 2024 | 10,789 |
| November 2024 | 10,082 |
| December 2024 | 10,396 |
| Total Reports | 42,340 |

Source: Mark43

SAPD officers are responsible for creating police reports using the Mark43 system. The officer submits his report electronically to his immediate supervisor, a Police Sergeant; the Sergeant either approves or rejects the report back to the officer. The approved report is placed in a queue for the UCR Office Management Analyst (MA) to review. The offense(s) listed and the report narrative are closely reviewed to ensure completeness and accuracy with National Incident-Based Reporting System (NIBRS) codes. The MA will either approve and finalize the report in the RMS or reject it back to the originating officer for further editing.

User access is administered by system administrators on the Chief's Technology Team (CTT). All users of the Mark43 system must have Criminal Justice Information Services (CJIS) clearance by completing CJIS Security and Privacy training and providing the CJIS certificate to SAPD management.

Audit Scope and Methodology

The audit scope was September through December 2024 for incident reports, and January 2025 for user access.

To gain an understanding of the Mark43 system, we interviewed SAPD personnel and conducted walkthroughs of the process for incident reports from creation to approval. We also gained an understanding of the process for managing user access within Mark43. The Uniform Crime Reporting (UCR) Office Standard Operating Procedures (SOP) and the City's Administrative Directive 7.8d User Access were our primary criteria for this audit.

We assessed internal controls relevant to the audit objective. This included a review of policies and procedures including the FBI National Incident-Based Reporting System (NIBRS) User Manual, UCR Office SOP, incident report approval, user access, segregation of duties, and training for the Mark43 system.

We obtained a random sample of 80 incident reports within the Mark43 system to determine if SAPD was accurately and completely recording crime data and reviewing the reports. Additionally, we obtained the current listing of Mark43 users to determine if user access was reasonable and segregation of duties were appropriate.

We relied on data in the Mark43 System to validate the accuracy and completeness of police reports generated by SAPD officers. 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 reviewing the accuracy of incident reports in Mark43. 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

The San Antonio Police Department (SAPD) is adequately completing, reviewing, and approving police incident reports within the Mark43 system. SAPD has developed and established adequate procedures for crime reporting and for using the Mark43 system. We reviewed a random sample of 80 completed police reports in the Mark43 system and determined that staff are appropriately reviewing incident reports to ensure all offenses are accurately recorded with the appropriate information. Also, SAPD is reporting crime data according to National Incident Based Reporting System (NIBRS) standards.

Although we determined that SAPD is adequately completing, reviewing, and approving incident reports, we believe user access controls could be strengthened as noted below.

A. Disabling User Accounts

Mark43 user accounts are not disabled in a timely manner. We obtained a list of all users who have access to the Mark43 system as of January 2025. We identified 153 out of 3,433 (about 4%) enabled user accounts that were for withdrawn users. However, we were able to verify that the network account for all 153 withdrawn users was disabled.

SAPD does not have a process in place to periodically review user access to ensure only authorized and appropriate users have access to the system. SAPD's process for disabling user accounts is dependent solely on email notifications of employee separations. However, separations may not be communicated through this method, leaving gaps in the process.

Administrative Directive (AD) 7.8d Access Control states that access to COSA IT assets must be disabled upon separation of the employee.

Not promptly disabling user accounts for separated user accounts increases the risk of unauthorized access. However, the Mark43 system is only accessible if the user has an active COSA network account. If the user's COSA network account is disabled promptly after separating from the City, the risk of unauthorized access to the Mark43 system is low.

Recommendation

The Chief of Police should develop and implement a process for timely notification of separated users to ensure Mark43 accounts are disabled promptly. Also, a periodic access review of all enabled users should be developed and implemented.

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Holly Williams, CISA, CRISC, Auditor in Charge

Appendix B – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

April 7, 2025

Buddy Vargas, CPA, CIA, CFE
City Auditor
San Antonio, Texas

RE: Management's Corrective Action Plan for Audit of the Mark43 System.

The San Antonio Police 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 | Disabling User Accounts The Chief of Police should develop and implement a process for timely notification of separated users to ensure Mark43 accounts are disabled promptly. Also, a periodic access review of all enabled users should be developed and implemented. | 5 | Accept | Captain Eric Hightower #5050 | July 31, 2025 |
| <u>Action plan:</u> The Chief's Technology Team will coordinate with SAPD – HR to receive notification when a non-sworn member transfers to another COSA department or separates from COSA eliminating the need for CJIS access. This process is already in place for sworn personnel. Additionally, SAPD Communications Unit will produce a quarterly list of any SAPD members (sworn / non-sworn) whose CJIS clearance lapsed. If a SAPD member's CJIS access is lapsed, the Technology Team will temporarily suspend access to Mark 43 until CJIS clearance is restored. The Technology Team will work with ITSD to evaluate the possibility of automating this process. Chief's Technology Team is responsible for ensuring appropriate access to Mark 43 and will conduct an annual review of enabled users. | | | | | |

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



Audit of San Antonio Police Department
Mark43 System

Sincerely,

W. McManus
William McManus
Chief of Police
San Antonio Police Department

4/9/25
Date

M. Villagomez
Maria Villagomez
Deputy City Manager
City Manager's Office

4/9/2025
Date