
CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR



Audit of San Antonio Police Department

Overtime Authorizations

Project No. AU20-030

August 10, 2021

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City Auditor

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 overtime authorization process. The audit objective, conclusions, and recommendations follow:

Determine if SAPD overtime is adequately supported, authorized, and documented.

While the SAPD has adequate internal controls to ensure standard overtime is supported and documented, improvements could be made to strengthen the overtime process.

We identified duplicate overtime transactions for special events in the Police Enforcement Management System (PEMS). We also identified standard overtime time cards that were not properly approved. Finally, we identified excessive users within PEMS that can input overtime data into the system.

We recommend that the Police Chief:

- Implement controls in PEMS to ensure special events cannot be reentered into the system after they have been closed out.
- Ensure that overtime records incorrectly approved are rejected.
- Perform periodic user access reviews and modify PEMS roles accordingly to ensure a proper segregation of duties that comply with the least privilege principle.

SAPD Management agreed with the audit findings and has developed positive action plans to address them. Management's verbatim response is in Appendix C on page 9.

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Background

The Police Department's role is to maintain the peace and enforce the law in a fair and consistent manner, operating within both the statutory and judicial limitations of its authority and constitutional rights of all persons. The Department's primary responsibility is creating a safe environment in which the people of San Antonio can live and work without fear of crime. Components include building proactive partnerships to lower the incidence of crime, apprehension of offenders, recovery and return of property, crowd and disaster control, and the movement of traffic within jurisdictional boundaries.

All services provided by the SAPD are performed by 3,156 full-time personnel with 2,488 being uniformed employees as of the fiscal year (FY) ended September 2020. Actual personal services costs including overtime for FY19 and FY20 were \$393M and \$412M, respectively. Of these amounts, SAPD uniformed personnel incurred actual overtime costs of \$25.7M and \$21.9M respectively.

For FY19 and FY20, we performed an analysis comparing SAPD overtime pay to base pay for uniformed personnel. Overtime as a percentage of base pay ranged from approximately 20% to 33%, depending on the SAPD unit. See Appendix A - Overtime by SAPD Unit for the analysis.

To document and monitor overtime costs, the SAPD utilizes the Police Enforcement Management System (PEMS) and the SAP system. PEMS is used to track and schedule special events overtime hours. Special events overtime is work performed by officers outside of normal city business such as Fiesta and Market Square celebrations. Bi-weekly, a flat file is uploaded into SAP from PEMS for payroll processing. In addition, SAPD uniformed officers standard overtime hours are directly input into SAP for payroll processing. Standard overtime hours relate to work associated with normal officer duties such as late calls and assisting other districts with manpower.

The Collective Bargaining Agreement (CBA) between the City of San Antonio and the San Antonio Police Officers' Association governs overtime compensation for Police Department uniformed personnel.

The table below displays the top 25 SAPD overtime types (by hours charged) and associated overtime costs for fiscal years 2020, 2019, and 2018. These overtime types are sorted based on FY 2020 amounts and include "late call" and "district fill" as the two highest types. Late call overtime is incurred when an officer works past his/her normal shift time due to an in-progress call. District fill overtime is incurred

when an officer must cover a shift for another officer at a particular district. Between FY2018 and FY2020, district fill overtime decreased by 51%.

	FY 2020		FY 2019		FY 2018	
Overtime (OT) Type	OT Hours	OT Sum	OT Hours	OT Sum	OT Hours	OT Sum
Late Call	74,656	\$4,200,959	68,722	\$3,843,123	61,411	\$3,350,975
District Fill	66,425	\$3,801,981	99,993	\$5,618,214	142,802	\$7,825,598
Holidays Specified by Contract	62,933	\$3,712,255	60,435	\$3,505,421	53,282	\$2,980,895
Voluntary Return to Service	22,631	\$1,529,759	21,045	\$1,390,800	18,682	\$1,205,209
Texas Cryptology Center (TCC)	22,267	\$1,398,898	18,206	\$1,105,970	13,431	\$785,155
Assignment Extension	16,290	\$1,073,243	15,646	\$1,010,431	13,455	\$844,224
Field Training Officer	8,161	\$444,597	5,540	\$298,318	3,926	\$206,055
Non-Sworn Voluntary Overtime	11,947	\$388,742	15,429	\$503,261	13,599	\$441,352
STRAC	3,790	\$238,225	N/A	N/A	N/A	N/A
Involuntary Callback	3,198	\$213,446	2,371	\$155,494	2,346	\$150,400
Human Trafficking	2,822	\$180,888	3,260	\$203,792	1,409	\$85,633
K-9	2,788	\$175,804	2,626	\$159,375	2,773	\$164,656
County Court Stand-By	2,800	\$158,774	8,216	\$457,142	9,962	\$538,847
FBI Reimbursable	1,938	\$131,364	1,637	\$108,531	1,903	\$121,277
Intellectual Property	1,789	\$125,878	667	\$45,502	N/A	N/A
Entertainment Districts	2,148	\$119,541	644	\$34,907	N/A	N/A
Applicant Processing	1,722	\$115,393	7,226	\$479,021	6,705	\$429,221
DEA Special Project	1,633	\$108,291	2,265	\$144,788	471	\$29,740
District Court	1,765	\$103,776	3,254	\$188,801	3,794	\$216,987
Work Relief Day	1,354	\$99,888	1,175	\$86,541	897	\$63,163
Mental Health Reimbursement	1,512	\$93,610	1,261	\$72,903	N/A	N/A
Shooting Team Standby	1,290	\$89,577	372	\$29,931	342	\$26,980
S.W.A.T.	1,226	\$78,453	1,628	\$101,211	2,432	\$146,464
Mayor Council Overtime	1,225	\$75,546	N/A	N/A	N/A	N/A
Mental Health Unit	1,074	\$70,646	617	\$37,041	13	\$755
Total	319,384	\$18,729,534	342,235	\$19,580,518	353,635	\$19,613,586

Audit Scope and Methodology

The audit scope was from October 2018 to September 2020. It included all overtime transaction types incurred by SAPD uniformed personnel as processed in SAP and PEMS.

We interviewed SAPD payroll personnel and obtained an understanding of the controls in place to review and monitor the uniformed overtime process in SAP. In addition, we interviewed uniformed SAPD operations personnel to obtain an understanding of the PEMS overtime processes.

We reviewed the Collective Bargaining Agreement (CBA) between the City of San Antonio and the San Antonio Police Officers' Association to determine if police officer overtime was paid properly.

Significant internal control components and principles include control activities such as overtime authorizations, approvals, reconciliations, and user access segregation of duties. We reviewed each control activity during our tests of procedures.

As part of our testing procedures, we reviewed standard overtime (e.g. late call, district fill) assigned to police officers to determine if it was approved, adequately supported, and accurate. Standard overtime is approved by two higher ranking officers and then entered directly into SAP by accounting staff.

We reviewed special events (e.g. Fiesta, Market Square) overtime in PEMS assigned to police officers to determine if it was approved, adequately supported and accurate. Special events overtime is tracked by a supervising officer who enters the overtime in PEMS, where it is then transferred to SAP. We reviewed the PEMS overtime entries that are transferred to SAP to verify they were accurate.

We reviewed SAP and PEMS user roles to verify access was appropriate and a proper segregation of duties was in place.

We relied on computer-processed data in the SAP and PEMS systems to validate the overtime hours paid to SAPD uniformed personnel. Our reliance was based on performing direct tests on the data rather than evaluating general and application controls. Our direct testing also included verifying overtime hours for SAPD personnel that were initially entered into PEMS were accurately transferred to and paid in SAP. We do not believe that the absence of testing general and application controls in these systems 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

A. Special Events Overtime in PEMS

Certain PEMS overtime transactions were entered twice and paid out. We reviewed the transfer of overtime data from PEMS to SAP and identified 14 overtime transactions that were duplicated. These duplicate transactions resulted in 32 hours of overtime payments to officers.

The duplicate transactions in PEMS occurred because certain special events were recording twice in the system. This weakness exists because special events can be reopened in PEMS and updated to include additional overtime transactions as discovered by the SAPD. This update would transfer to SAP and officers would be paid twice. While the number of duplicate hours were not significant, the fact that Supervisors had the ability to input duplicate hours in PEMS is a control weakness in the process that needs to be corrected.

Recommendation

The Police Chief should implement controls in PEMS to ensure special events cannot be reentered into the system after they have been closed out.

B. Inappropriate Standard Overtime Approval

Standard overtime was not properly approved. We judgmentally selected 50 overtime transactions from the top five overtime categories and determined that five transactions did not follow the appropriate approval process.

All overtime transactions are required to be documented with a time card that is approved by two separate approvers (supervisors) above the submitting officer's rank. However, we identified the following issues with approval:

- 4 out of the 50 time cards reviewed showed two Supervisory officers had approved their own overtime and were also each other's second approver.
- 1 out of the 50 time cards showed a Supervisory officer approving his own overtime and the second approver was a lower ranking Supervisory officer.

According to the SAPD General Manual, overtime time cards submitted by sworn members shall be reviewed and verified by at least two supervisors prior to being submitted to Payroll Services.

Bypassing the proper approval process for overtime transactions could result in inappropriate and excessive overtime payments to officers.

Recommendation

The Police Chief should ensure that overtime records incorrectly approved are rejected.

C. Excessive PEMS User Access

SAPD had excessive users with access to input overtime data into the PEMS system. We noted 48 out of 82 PEMS users were not removed from the system when they left the City or no longer needed access. In addition, all users have the same access in PEMS; i.e. roles are not differentiated to allow for a proper segregation of duties.

Administrative 7.8d Access Control states access controls should be periodically reviewed and access should be limited based on the principle of least privilege. The SAPD has not performed PEMS user access reviews so that access is limited to only users that require it.

Since PEMS has only one role that provides all access to users, excessive user access could result in improper and unauthorized overtime transactions. Removing unnecessary access ensures only authorized transactions are processed.

Recommendation

The Police Chief should perform periodic user access reviews and modify PEMS roles accordingly to ensure a proper segregation of duties that comply with the least privilege principle.

Appendix A – Overtime by SAPD Unit

The table below shows overtime pay for uniformed personnel (by SAPD unit) as a percentage of base pay. Overtime as a percentage of base pay for the top ten units ranged from approximately 20% to 33% over the two-year period shown depending on the SAPD unit and fiscal year.

SAPD Unit	FY 2020			FY 2019		
	Base Pay	Overtime Pay	Overtime Pay as % of Base Pay	Base Pay	Overtime Pay	Overtime Pay as % of Base Pay
Impact Detail	\$2,855,966	\$951,189	33%	\$944,784	\$264,844	28%
Bomb Squad Detail	\$1,009,147	\$260,827	26%	\$358,113	\$88,524	25%
Executive Protection	\$1,298,004	\$318,440	25%	\$423,331	\$127,507	30%
K-9 Detail	\$3,321,980	\$811,838	24%	\$1,049,455	\$244,802	23%
HIDTA Initiative Grant	\$1,823,526	\$435,879	24%	\$697,839	\$143,482	21%
Narcotics	\$9,016,122	\$2,116,663	23%	\$3,059,885	\$757,416	25%
Office of the Chief	\$870,102	\$201,468	23%	\$318,134	\$83,594	26%
Bureau Liaison	\$248,648	\$54,357	22%	\$82,777	\$17,217	21%
Homicide	\$13,451,960	\$2,867,314	21%	\$4,307,561	\$880,408	20%
Downtown Bike Patrol	\$14,990,742	\$3,088,521	21%	\$5,100,439	\$1,028,049	20%
Totals	\$48,886,197	\$11,106,496	23%	\$16,342,318	\$3,635,843	22%

Appendix B – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Danny Zuniga, CPA, CIA, Auditor in Charge
Susan VanHoozer, CIA, CISA, Auditor

Appendix C – Management Response



CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

July 26, 2021

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

RE: Management's Corrective Action Plan for Audit of San Antonio Police Department Overtime Authorizations

The San Antonio Police Department 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
1	Special Events Overtime in PEMS The Police Chief should implement controls in PEMS to ensure special events cannot be reentered into the system after they have been closed out.	5	Accept	D.C. Robert Blanton	June 1, 2021
	Action plan: The SAPD has worked with ITSD to update the PEMS software to include an event status code which permanently closes the event to SAPD users. This update prevents SAPD users from updating or reentering events closed by Payroll & Accounting.				
2	Inappropriate Standard Overtime Approval The Police Chief should ensure that overtime records incorrectly approved are rejected.	6	Accept	Asst. Police Director Rick Riley D.C. Robert Blanton	June 1, 2021


Appendix C – Management Response Continued

Recommendation					
#	Description	Audit Report Page	Accept, Decline	Responsible Person's Name/Title	Completion Date
Action plan: <p>SAPD Payroll & Accounting personnel will reject all overtime records that are incorrectly approved outside of SAPD policy. The overtime records will be returned to the submitting supervisor for proper approval. (Completion: June 2021)</p> <p>The SAPD is currently engaged with ITSD to develop a business case for an electronic Personnel Scheduling system. The SAPD will pursue the ability to submit and verify overtime records via an electronic software system allowing for increased accuracy, efficiency, and lessen the impact to the environment. (Estimated June 1, 2022)</p> <p>The Finance Department Compliance and Resolution Team is assisting SAPD in strengthening controls and procedures to prevent overtime authorizations that are not consistent with Department's operating procedures. (Completion: September 2021)</p>					
3	Excessive PEMS User Access <p>The Police Chief should perform periodic user access reviews and modify PEMS roles accordingly to ensure a proper segregation of duties that comply with the least privilege principle.</p>	6	Accept	D.C. Gus Guzman	June 30, 2021
Action plan: <p>The SAPD will review PEMS user access and roles in June and December of each calendar year to ensure a proper segregation of duties that comply with the least privilege principle.</p>					

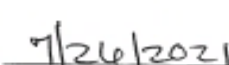
We are committed to addressing the recommendations in the audit report and the plan of actions presented above.

Sincerely,


 William McManus
 Police Chief
 San Antonio Police Department


 Date 5/3/21


 Maria Villalobos
 Deputy City Manager
 City Manager's Office


 Date 7/26/2021