

The seal of the Missouri State Auditor is circular and features a central figure holding a scale and a sword. The text around the seal reads "SEAL OF THE STATE AUDITOR" at the top, "JUSTICE WE STAND DIVIDED" in the middle, and "1820 MISSOURI 1892" at the bottom.

**Nicole Galloway, CPA**

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**Missouri State Auditor**

**City of St. Louis**

**Department of Public Safety**

Report No. 2020-079

September 2020

[auditor.mo.gov](http://auditor.mo.gov)



**Nicole Galloway, CPA**  
Missouri State Auditor

# CITIZENS SUMMARY

## Findings in the audit of the City of St. Louis Department of Public Safety

SLMPD Secondary Employment Controls and Procedures	The St. Louis Department of Public Safety (SLMPD) does not have procedures to periodically review secondary employment hours reported and, as a result, did not detect some employees claiming to be working at the SLMPD at the same time as they were working at their secondary employer or incorrectly recorded secondary employment hours. The SLMPD does not ensure employees are approved for secondary employment annually as required. The SLMPD does not have adequate controls and procedures in place to ensure employers submit required documentation.
SLMPD Overtime Management Controls	The SLMPD does not have adequate procedures in place to periodically review overtime data to identify potentially unusual, unexplained, excessive, or disproportionate overtime usage and, as a result, cannot identify potential improper overtime.
SLMPD Accounting Controls and Procedures	Weaknesses exist in receipting payments received by the Budget and Finance division. Transmitting and depositing procedures for the Fitness Center, Records division, and Prisoner Processing section need improvement. The department's handling of bank accounts needs improvement. In addition, the SLMPD has not established procedures to routinely follow up on outstanding checks.
Vehicle Maintenance and Use Allowance	The 3 DPS sections (Building division, St. Louis Fire Department (STLFD), and Neighborhood Stabilization team) that provide monthly vehicle allowances interpret when allowance amounts should be reduced by ordinance differently. STLFD procedures for monitoring employee eligibility for the monthly vehicle allowance need improvement.
Expenditures	Some DPS departments did not prepare disbursement vouchers timely, and as a result, one department paid unnecessary late fees.
SLMPD Assets	Capital assets were not always recorded accurately, items were not always tagged or identified as SLMPD property, and items that could not be located. Armory personnel do not update the firearms database timely and, as a result, the database is not complete and accurate. Approximately \$439,000 of computer equipment purchased between 2005 and 2019 was stored at the SLMPD's Supply division warehouse at June 30, 2019.
Time Records	The Building and Corrections divisions do not require timesheets or other documentation for hours worked for some division employees, in violation of city personnel regulations.
Sunshine Law	The Civilian Oversight Board discussed some topics in closed session that are not allowable under the Sunshine Law.
SLMPD Written Agreements	The SLMPD does not have a formal written agreement with the St. Louis Cardinals for performing bomb and explosive detection services for events held at Busch Stadium.

Fire Department Merchandise  
Account

The STLFD maintains money in a bank account outside the city treasury, in violation of the city charter.

In the areas audited, the overall performance of this entity was **Fair**\*

\*The rating(s) cover only audited areas and do not reflect an opinion on the overall operation of the entity. Within that context, the rating scale indicates the following:

- Excellent:** The audit results indicate this entity is very well managed. The report contains no findings. In addition, if applicable, prior recommendations have been implemented.
- Good:** The audit results indicate this entity is well managed. The report contains few findings, and the entity has indicated most or all recommendations have already been, or will be, implemented. In addition, if applicable, many of the prior recommendations have been implemented.
- Fair:** The audit results indicate this entity needs to improve operations in several areas. The report contains several findings, or one or more findings that require management's immediate attention, and/or the entity has indicated several recommendations will not be implemented. In addition, if applicable, several prior recommendations have not been implemented.
- Poor:** The audit results indicate this entity needs to significantly improve operations. The report contains numerous findings that require management's immediate attention, and/or the entity has indicated most recommendations will not be implemented. In addition, if applicable, most prior recommendations have not been implemented.

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# City of St. Louis - Department of Public Safety

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## **NICOLE GALLOWAY, CPA**

### **Missouri State Auditor**

To the Honorable Mayor  
and  
Director of Department of Public Safety  
City of St. Louis, Missouri

We have audited certain operations of the City of St. Louis Department of Public Safety in fulfillment of our duties under Section 29.200.3, RSMo. The State Auditor initiated audits of the City of St. Louis in response to a formal request from the Board of Aldermen. The city engaged KPMG LLP, Certified Public Accountants (CPAs), to audit the city's financial statements for the year ended June 30, 2019. To minimize duplication of effort, we reviewed the CPA firm's report. The scope of our audit included, but was not necessarily limited to, the year ended June 30, 2019. The objectives of our audit were to:

1. Evaluate the department's internal controls over significant management and financial functions.
2. Evaluate the department's compliance with certain legal provisions.
3. Evaluate the economy and efficiency of certain management practices and procedures, including certain financial transactions.

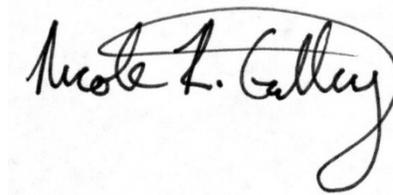
Our methodology included reviewing minutes of meetings, written policies and procedures, financial records, and other pertinent documents; interviewing various personnel of the department, as well as certain external parties; and testing selected transactions and inspection of capital assets. We obtained an understanding of internal controls that are significant within the context of the audit objectives and assessed whether such controls have been properly designed and placed in operation. We tested certain of those controls to obtain evidence regarding the effectiveness of their design and operation. We also obtained an understanding of legal provisions that are significant within the context of the audit objectives, and we assessed the risk that illegal acts, including fraud, and violations of applicable contract, grant agreement, or other legal provisions could occur. Based on that risk assessment, we designed and performed procedures to provide reasonable assurance of detecting instances of noncompliance significant to those provisions.

We conducted our audit in accordance with the standards applicable to performance audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform our 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 such a basis.

The accompanying Organization and Statistical Information is presented for informational purposes. This information was obtained from the department's management and was not subjected to the procedures applied in our audit of the department.

For the areas audited, we identified (1) deficiencies in internal controls, (2) noncompliance with legal provisions, and (3) the need for improvement in management practices and procedures. The accompanying Management Advisory Report presents our findings arising from our audit of the City of St. Louis Department of Public Safety.

Additional audits of various official and departments of the City of St. Louis are in process, and any additional findings and recommendations will be included in subsequent reports.

A handwritten signature in black ink that reads "Nicole R. Galloway". The signature is written in a cursive style with a large, looping flourish at the end of the name.

Nicole R. Galloway, CPA  
State Auditor

The following auditors participated in the preparation of this report:

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# City of St. Louis - Department of Public Safety

## Management Advisory Report

### State Auditor's Findings

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#### **1. SLMPD Secondary Employment Controls and Procedures**

Significant weaknesses exist in St. Louis Metropolitan Police Department (SLMPD) controls and procedures over secondary employment.

Special Order 3-07 (SO 3-07), issued in July 2013 and February 2012, governs off-duty or secondary employment for SLMPD employees. Secondary employment is defined as employment in which an employee is compensated, not limited to the direct receipt of cash, in exchange for services rendered or an expectation of services from a party or employer, other than the SLMPD. The city had 1,041 SLMPD employees registered and approved to work for 164 secondary employers<sup>1</sup> as of June 30, 2019.

In March 2018, the SLMPD established a team to analyze the weaknesses in existing procedures and propose solutions to strengthen controls over secondary employment. The team completed a revised Special Order 3-07 in July 2020 that was approved for implementation in August 2020. In addition, SLMPD officials indicated the team referred a criminal case involving one employee for prosecution in August 2018. The case remains under review as of August 2020.

We selected 65 employees registered and approved to work secondary employment during fiscal year 2019. Many of these employees were authorized to work for more than one secondary employer. We requested the SLMPD obtain employee time records from each secondary employer for the period reviewed. In addition, we requested all employee and secondary employer documents on file with the SLMPD for the employers selected. We initially selected 30 employees and reviewed documentation from one of their secondary employers for one month. Based on our initial review and concerns received, we selected an additional 30 employees and reviewed documentation from all of their secondary employers for one month. Finally, based on additional concerns received, we expanded our review and selected an additional 5 employees employed by the same secondary employer and reviewed secondary employer documentation for the entire fiscal year. We reviewed documentation for 64<sup>2</sup> employees and 42 unique secondary employers.

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<sup>1</sup> The SLMPD also had an additional 48 grant programs that are considered secondary employers because employees working on those grant programs are subject to many of the same requirements for authorization as described in MAR Section 1.2. However, grants are not subject to employer requirements as described in MAR Section 1.3; therefore, we did not review for those requirements during our testing.

<sup>2</sup> One employee in the first selection of 30 was not tested. Certain elements in the data provided from the department's timekeeping system were incorrect for this employee, resulting in the selection of an employee that did not have applicable secondary employment during the test period.



## 1.1 Monitoring of secondary employment hours

The SLMPD does not have procedures to periodically review secondary employment hours reported. As a result, the SLMPD did not detect some employees claiming to be working at the SLMPD at the same time as their secondary employer or incorrectly recorded secondary employment hours. In addition, existing monitoring procedures did not detect employees working more than the allowed 16 hours per day.

The SLMPD does not periodically request timesheets or other time records from secondary employers and compare those records to secondary employment hours in the department's timekeeping system. Per SO 3-07, all commissioned employees are required to enter all time worked on secondary employment into the department's timekeeping system. Also, SO 3-07 requires all secondary employers to prepare and maintain a ledger of the date and number of hours worked by each SLMPD officer employed in a secondary capacity and for this ledger to be available to the SLMPD's Bureau of Professional Standards upon request.

We compared time records from secondary employers to SLMPD records and noted the following concerns.

### Duplicated time

We identified 5 of the 42 (12 percent) applicable<sup>3</sup> employees reported working at the SLMPD and their secondary employer at the same time. The duplicated time totaled approximately 16 hours and ranged from 30 minutes to more than 4 hours per day. Because the SLMPD does not have processes in place to detect errors, the duplicated time may represent errors in time records or time inappropriately reported as worked. Additional information is presented in Appendix B.

### Secondary employment time not recorded

Department records for 31 of the 38 (82 percent) applicable<sup>4</sup> employees indicated the employee did not enter any of his/her secondary employment time in the department timekeeping system or he/she entered the time inaccurately. Additional information is presented in Appendix C.

### Daily and weekly hour maximums

SLMPD procedures for identifying employees working in excess of 16 hours per day did not detect some errors. Per SO 3-07, SLMPD employees may not work in excess of 16 hours in any one day; this daily limit includes regular duty, overtime, and secondary employment. SO 3-07 states that the requirements established are intended to promote officer safety and performance.

<sup>3</sup> Only 42 of the employees worked secondary employment hours during the period reviewed.

<sup>4</sup> Our test included 4 civilian employees who are not required to enter secondary employment hours in the department's timekeeping system.



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Monthly, the department's internal auditor reviews a report from the timekeeping system that shows all employees who worked more than 16 hours per day, including any secondary employment hours entered. He notes if non-mandatory<sup>5</sup> overtime and/or secondary employment resulted in the officer exceeding 16 hours worked in a day. Suspected violations are sent to commanders; however, they are not required to report back on any actions taken.

City employee and secondary employer records for 4<sup>6</sup> of 64 (6 percent) employees reviewed showed the employee worked more than 16 hours total at the SLMPD and their secondary employer in one day. However, because none of these employees entered secondary employment hours into the department's timekeeping system the excess hours were not included on the list reviewed by the internal auditor and the errors were not detected. Issues noted included the following:

- One employee worked almost 13 duty hours (including overtime) for the SLMPD and also worked 4 hours of secondary employment, for a total of approximately 17 hours on a day in January 2019.
- One employee worked 14.75 duty hours (including overtime) for the SLMPD and also worked 7 hours of secondary employment, for a total of 21.75 hours on a day in July 2018.
- One employee worked 16 duty hours (including overtime) for the SLMPD and also worked 5 hours of secondary employment, for a total of 21 hours on a day in August 2018. On another day in the same month, this employee worked more than 12 duty hours (including overtime) for the SLMPD and also worked 5 hours of secondary employment, for a total of more than 17 hours.
- One employee worked 12 duty hours (including overtime) for the SLMPD and also worked 6.5 hours of secondary employment, for a total of 18.5 hours on a day in July 2018.

## Conclusion

Periodic reviews of secondary employment time that includes comparing time records from secondary employers to the department's timekeeping system are necessary to ensure compliance with department rules, accurate time reporting, and to detect errors and any inappropriately claimed time. Also, existing procedures to identify employees working in excess of 16 hours per

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<sup>5</sup> An officer required to work mandatory overtime is exempt from the 16 hour per day rule.

<sup>6</sup> These 4 employees are included in the 31 employees who did not record their secondary employment time and are included in Appendix C.



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day are ineffective if improvements are not made to ensure secondary employment hours are reported.

### 1.2 Employee authorization for secondary employment

The SLMPD does not ensure employees are approved for secondary employment annually as required.

The authorization for secondary employment forms for 2 of 64 (3 percent) employees reviewed had not been updated annually as required. As of July 2019, the most recent secondary employment permit update forms on file for these 2 employees were from 2017; however, they were still actively working for their secondary employers. Officials indicated employees are expected to voluntarily comply with the requirements. Also, when an employee is first approved for secondary employment, personnel enter the approval in the department's timekeeping system. This approval remains active indefinitely in the timekeeping system and the SLMPD only makes changes if the department receives notice that the employee no longer works for the secondary employer.

SO 3-07 requires all SLMPD employees requesting to work secondary employment to submit a separate application and permit form for each employer for which they are requesting authorization. This form must be approved through the chain of command. If the employee continues to work for the same secondary employer(s) longer than a year, the permit information must be updated annually by submitting an update form for approval. Improvements in controls and procedures are necessary to ensure SLMPD employees update their authorization for secondary employment on an annual basis as required. Without updated information, the SLMPD may not be aware of all personnel working secondary employment.

### 1.3 Secondary employer documentation requirements

The SLMPD does not have adequate controls and procedures in place to ensure employers submit required documentation.

SO 3-07 requires all businesses and organizations employing SLMPD personnel in a secondary employment capacity submit a completed and signed "Secondary Employer Indemnification/Disclaimer and Workers' Compensation/General Liability" form, a current certificate of liability insurance that reflects both general liability and workers' compensation coverage, and a completed and signed "Secondary Employer's Responsibility" form. In order to remain eligible, secondary employers must submit proof of continuing coverage for general liability and workers' compensation insurance annually at the policy renewal date. These requirements are designed, in part, to ensure secondary employers have acknowledged their understanding of all legal requirements and have necessary insurance coverage.



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We reviewed 42 secondary employers to determine if they were in compliance with the requirements of SO 3-07 and identified the following issues:

- A "Secondary Employer Indemnification/Disclaimer and Workers' Compensation/General Liability" form was not on file for 6 of the 42 employers (14 percent).
- A current certificate of general liability insurance coverage form was not on file for 7 of the 42 employers (17 percent).
- A current certificate of workers' compensation insurance coverage was not on file for 7 of the 42 employers (17 percent).
- A "Secondary Employer's Responsibility" form was not on file for 14 of the 42 employers (33 percent).

The SLMPD is responsible for ensuring secondary employers comply with the various requirements and improved controls and procedures are necessary to ensure secondary employers submit and update necessary documentation.

## Recommendations

The SLMPD:

- 1.1 Monitor employee compliance with secondary employment regulations including periodically comparing secondary employer records to SLMPD records.
- 1.2 Establish controls and procedures to ensure employees working secondary employment submit documentation as required.
- 1.3 Establish controls and procedures to ensure the department obtains required documentation from secondary employers and retains the documentation.

## Auditee's Response

- 1.1 *This recommendation has been implemented.*

*Lt. Col. Michael Sack was assigned to the Bureau of Professional Standards on January 1, 2018. By the end of January, he discovered irregularities involving potential violations of timekeeping for secondary employment. In March 2018, he created a special audit team to look at possible criminal and internal violations related to time reporting and secondary employment. The audit team completed its work for this area in October 2019. Their investigation revealed a lack of oversight for secondary employment, the need for a rewrite of Special Order 3-07, and an assertive effort to gain compliance. A case involving an SLMPD employee was presented to the Federal*



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*Bureau of Investigation and the United States Attorney's Office which is under review at this time.*

*Lt. Kirk Deeken was assigned to the Bureau of Professional Standards on April 15, 2019 to monitor compliance. He requests hours worked by SLMPD officers from their secondary employers. He compares the hours worked for the secondary employer against hours worked for the SLMPD and the hours the officer entered into PeopleSoft. He also uses the records to verify the officer has a current secondary employment form on file. Any violations are noted and acted upon.*

*With regard to the SLMPD's "16-hour rule," the recommendations have been implemented. The SLMPD Auditor II, assigned to the Budget and Finance Division, produces a bi-weekly report listing all "16-hour rule" violations and forwards the report to the Bureau of Professional Standards. Lt. Deeken reviews the report and investigates to ascertain if there are violations. If Lt. Deeken cannot determine if any exceptions in the report are violations, he contacts the Unit Commander to investigate further.*

*1.2 This recommendation has been implemented.*

*SLMPD Special Order 3-07 requires officers to submit a secondary employment form to work for an approved secondary employer. Officers are also required to submit a secondary employment update as part of their annual performance review. Failure to submit this form will prevent an officer from entering secondary employment hours into PeopleSoft. Similarly, failure to renew secondary employment annually will automatically cancel the officer's secondary employment privileges, preventing the officer from entering secondary employment hours into PeopleSoft.*

*1.3 This recommendation has been implemented.*

*SLMPD Special Order 3-07 requires employers to submit current documentation, including an "indemnification" form, to remain on file with the Bureau of Professional Standards. It also requires all documentation to be current. Failure to submit or maintain proper documentation results in the termination of the secondary employer's status with the SLMPD and prohibits officers from working for that secondary employer.*



*Lt. Deeken maintains a calendar on all secondary employers and sends them a renewal reminder sixty days prior to the lapse of their insurance.*

## 2. SLMPD Overtime Management Controls

Analysis of high overtime usage

The SLMPD does not have adequate procedures in place to periodically review overtime data to identify potentially unusual, unexplained, excessive, or disproportionate overtime usage and, as a result, cannot identify potential improper overtime. The SLMPD paid more than 1,200 employees approximately \$13.8 million<sup>7</sup> in overtime wages during fiscal year 2019.

We requested a report<sup>8</sup> of all salaries, overtime wages, and other payroll adjustments by check date for each SLMPD employee for fiscal year 2019. We reviewed this report and other data<sup>9</sup> and determined at least 99 SLMPD employees (8 percent) in our analysis were paid overtime that was equivalent to 50 percent or more of their base salary during the period.

Number of employees who earned overtime of at least 50 percent of base salary

Overtime Wages as a Percentage of Base Salary	Commissioned Employees	Civilian Employees	Total Employees
100 or greater	8	0	8
90.00 to 99.99	1	0	1
80.00 to 89.99	12	1	13
70.00 to 79.99	14	3	17
60.00 to 69.99	18	0	18
50.00 to 59.99	38	4	42
	91	8	99

The 99 employees listed in the table were assigned to 26 different units within the SLMPD. The department's six districts accounted for a significant number of these employees (42) followed by various units including intelligence-federal task force (10), traffic/mounted patrol (9), communications (8), and homicide (5). The remaining 25 employees were from 16 other units. We obtained detailed reports of overtime by day from the department's timekeeping system for the top 5 overtime wage earners (based on

<sup>7</sup> This analysis includes all commissioned employees regardless of hire date, and civilian employees hired after the SLMPD moved to local control in September 2013. Overtime for civilians hired prior to local control is identified as a payroll adjustment in the department's timekeeping system and the adjustment amount includes other types of compensation in addition to overtime; therefore, these employees were excluded from our analysis. Commissioned personnel ranking higher than sergeant are exempt from overtime per the city's compensation ordinance No. 70791.

<sup>8</sup> Personnel from the city's Information Technology Services Agency generated the report.

<sup>9</sup> For police sergeants, the Budget and Finance division must periodically prepare a spreadsheet and perform calculations to determine the number of hours each sergeant worked in excess of 160 in a 28 day period as outlined in the city's payroll ordinance. We obtained all sergeant overtime spreadsheets for payments made in fiscal year 2019 for our analysis.



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percentage) and noted they worked a combined total of 8,551 hours of overtime, an average of 1,710 hours each. That is an average of 73 hours worked per week for each employee.

SLMPD Budget and Finance division personnel indicated the majority of overtime hours were due to staffing shortages in the department. The SLMPD officials indicated they are continuing efforts to fill vacancies, including continuation of the cadet program and offering a higher starting salary for police officers. The Mayor and Chief of Police also testified before the Missouri House Judiciary Committee in January 2020 in support of lifting the residency requirement with the intent of filling vacancies. The Chief of Police testified the SLMPD has been operating from 100 to 150 officers below the department's authorized strength of 1,340 officers for at least the past 3 years. At the time of the hearing, the department was 138 officers short, or approximately 10 percent less than the authorized strength.

#### Monitoring of overtime

The SLMPD has limited procedures for monitoring overtime. The department primarily relies on supervisors to ensure any overtime worked by employees is reasonable and necessary. All employees submitting overtime hours must enter comments in the timekeeping system to explain the reason(s) for overtime hours worked and all overtime must be approved by a supervisor.

The only other process in place to monitor overtime usage and detect any unusual activity is a budget review performed by the SLMPD's Budget and Finance division. Division personnel periodically review a budget to actual report of all departmental expenses and distribute it to all civilian and commissioned commanders. This review includes base salaries and overtime; however, it is performed at a high level and is not documented. Budget and Finance division personnel responsible for reviewing this report indicated that due to ongoing staffing shortages in the department, they would only be concerned and perform further investigation if the combined amount of overtime and salaries exceeded the budgeted amount. The review does not include a targeted review of salaries and overtime at the division level and the SLMPD does not generate other reports or perform other procedures to identify and evaluate unusual, unexplained, or disproportionate overtime usage.

#### Conclusion

While overtime may be necessary to address staffing shortages, the SLMPD should remain diligent in identifying unusual or unexplained changes to ensure resources are properly allocated to those areas most in need. According to guidance from the National Institute of Justice<sup>10</sup> (NIJ), because improper

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<sup>10</sup> National Institute of Justice, Research Brief: Police Overtime, 1998. In May 2020, we contacted the National Institute of Justice and their personnel verified that that this guidance for police overtime is the most recent guidance published on this topic and still represents their position on the topic.



uses of overtime typically occur in the form of large and undetected overtime earnings by individuals or units, police departments should analyze patterns of overtime expenditures by individuals, by units, and by the nature of the work performed. In addition, the NIJ recommends police departments identify unusual payouts to individuals or units. Monitoring trends in the overtime usage of high users would allow the SLMPD to identify and investigate cases of potential improper uses of overtime.

## Recommendation

The SLMPD should ensure there is sufficient oversight of overtime on a division and department-wide basis to better identify unusual, unexplained, or disproportionate use of overtime.

## Auditee's Response

*This recommendation has been implemented.*

*The department has experienced a large number of vacancies that has necessitated the use of overtime to backfill both commissioned and civilian positions. The department is a 24/7 operation and dispatchers and officers must be available to answer and respond to calls for service.*

*The department also has grants that require specialized skills that limit the number of officers that can perform the work required. For example, the Motor Carrier Safety Assistance Program involves officers with specialized training conducting traffic stops of semi-trailers and conducting safety inspections. Also, when homicide detectives start working a case they may work 24 hours straight to develop leads and question witnesses.*

*Additional overtime comes with a need for additional transparency on the number of hours of overtime worked by officers and by civilians.*

*Every two weeks commanders receive an email listing the overtime hours worked year-to-date and during the pay period for every employee. This will permit greater scrutiny by commanders and their subordinates and increase accountability.*

*In addition, every two weeks commanders receive a report highlighting employees who work more than 50 percent above the norm of hours for their class title.*

### **3. SLMPD Accounting Controls and Procedures**

The SLMPD's accounting controls and procedures need improvement. Various divisions within the department receive payments. The majority of this money is transmitted to the SLMPD's Budget and Finance division. That division also receives some payments directly, and this money along with the money received from the other divisions is transmitted to the Treasurer's office. Some payments such as bonds received by the Prisoner Processing section or collections by the Private Security section, are deposited directly into a SLMPD bank account.



### 3.1 Receipting procedures

Weaknesses exist in receipting payments received by the Budget and Finance division.

Budget and Finance division personnel do not issue receipt slips for checks or money orders received. Division personnel also do not record these receipts on a receipt log. Receipt slips are only issued for cash that is initially received by the division. However, copies of checks and money orders are retained and attached to the stamped copy of the receipt coding form returned by the Treasurer's office after a deposit has been made. Special Order 2-06 requires that receipt slips be issued for any cash or checks received; this applies department-wide.

To properly account for all receipts and ensure payments received are accounted for properly and transmitted for deposit, official pre-numbered receipt slips should be issued in numerical order for all payments received or all receipts should be recorded on a log and receipts should be reconciled to receipt records as required.

### 3.2 Transmittals and deposits

Transmitting and depositing procedures for the Fitness Center, Records division, and Prisoner Processing section need improvement.

#### Fitness center

Fitness Center personnel do not always transmit fees collected timely and do not restrictively endorse checks or money orders immediately upon receipt. Checks and money orders are not restrictively endorsed until Fitness Center personnel prepare transmittals for the Budget and Finance division. The Fitness Center is part of the SLMPD Police Academy and the facilities are offered to all department personnel, their families, and any federal, state, or local government employees. The Fitness Center collects annual membership and access card fees. During fiscal year 2019, the Fitness Center transmitted receipts to the Budget and Finance division totaling \$7,640.

During fiscal year 2019, the Fitness Center made 7 transmittals that ranged from \$60 to \$5,175. The receipts associated with these 7 transmittals were held by the Fitness Center for 6 to 62 days before transmittal to the Budget and Finance division. Special Order 2-06 requires receipts received to be transmitted to the Budget and Finance division weekly. Of these transmittals, only 1 included receipts that had been held for less than a week.

#### Records division

The Records division does not always transmit receipts intact. The Records division receives payments for police reports, background checks, and fingerprinting services. The division collected and transmitted receipts to the Budget and Finance division totaling approximately \$85,000 during the year ended June 30, 2019.

Our review of receipts collected on January 5, 2019 (Saturday) and January 7, 2019 (Monday) identified 3 receipts, totaling \$31, excluded from the next



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transmittal. Weekends are not considered official business days and the standard practice is to transmit these receipts on the next business day. All other receipts collected on these 2 days were transmitted at the end of the next business day as expected. Division officials could not explain why the receipts were not in that transmittal. The receipts were in the subsequent transmittal.

Fugitive bonds

The Prisoner Processing section does not always timely deposit fugitive cash bonds. This money is collected for individuals arrested and held on charges from other jurisdictions. During fiscal year 2019, the section collected approximately \$120,000 in fugitive cash bonds.

Collections are often deposited several days or more after receipt, allowing a significant amount of cash to accumulate. We reviewed deposits and associated receipts for a 14-day period in December 2018 and another 14-day period in March 2019. The periods selected included 4 deposits. During these periods, we noted deposits did not occur timely. For example, collections totaling \$11,049 receipted in November 2018 and December 2018 were deposited from 2 to 21 days later (14 of 20 bond receipts were held longer than 7 days). Although the timeliness of deposits made in subsequent periods improved, we still noted bond payments held for up to 8 days prior to deposit.

Conclusion

To safeguard receipts and to reduce the risk of loss, theft, or misuse of money received, procedures should be established to ensure all receipts are transmitted or deposited timely and intact. In addition, checks and money orders should be restrictively endorsed upon receipt.

3.3 Bank accounts and outstanding checks

The department's handling of bank accounts needs improvement. In addition, the SLMPD has not established procedures to routinely follow up on outstanding checks.

Fugitive bond account

The department incurred fees in the fugitive bond bank account that were not reimbursed by the Budget and Finance division timely. As a result, the reconciled book balance of the account was negative \$46 as of June 2019.

We reviewed monthly bank statements and bank reconciliations for the fugitive bond bank account for fiscal year 2019. The department incurred monthly bank service charges and fees for purchasing checks totaling \$673 during this period. In June 2019, the Budget and Finance division reimbursed the account approximately \$1,014. This reimbursement covered nearly 2 years (April 2017 through February 2019) of monthly bank service charges and fees for purchasing checks.

The money in the fugitive bond account is owed to other jurisdictions. If fees are not reimbursed timely, the account is at risk of having insufficient funds for required disbursements and the reconciled book balance being negative.



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Outstanding checks

The Budget and Finance division does not have adequate procedures to follow up on outstanding checks.

- Our review of the June 2019 bank reconciliation for the property custody account noted 2 checks (\$583) have been outstanding more than 5 years.
- As of April 2019, the Budget and Finance division was holding 3 payroll checks (\$36,300) for former employees. These checks were issued between February 2015 and November 2016. Budget and Finance personnel indicated these payroll checks were held for safekeeping because they did not have and could not locate proper contact information for the rightful owner. After we discussed this issue with division personnel, they located one of the former employees and issued a replacement check in May 2019.
- As of June 2019, 5 checks (\$1,358) written from the fugitive bond account have been outstanding for more than 5 years.

Procedures to routinely follow up on outstanding checks are necessary to prevent money from accumulating in accounts and ensure it is appropriately disbursed to the payee or as otherwise provided by state law.

Similar conditions  
previously reported

We noted similar conditions to sections 3.1 and 3.2 in our prior audit report. In the *Follow-Up Report on Audit Findings City of St. Louis Department of Public Safety*, Report No. 2018-119, released in November 2018, department officials indicated these previous recommendations had been implemented; however, we found that corrective action taken was not always effective and problems continue to exist.

Recommendations

The SLMPD:

- 3.1 Ensure pre-numbered receipt slips are issued for all payments received or all receipts are recorded on a log.
- 3.2 Transmit and deposit receipts timely and intact, and ensure checks and money orders are restrictively endorsed upon receipt.
- 3.3 Closely monitor the activity of the fugitive bond bank account and ensure monthly bank service charges and fees are reimbursed timely. In addition, the SLMPD should routinely investigate outstanding checks. Old outstanding checks should be voided and reissued to payees that can be readily located. If payees cannot be located, the money should be disposed of in accordance with state law.

Auditee's Response

- 3.1 *This recommendation has been implemented.*



*Employees have received re-instruction on correct procedures. Checks are restrictively endorsed upon receipt and cash is logged by a different employee in Budget and Finance than the one tasked with preparing the Receipt Coding Form (RCF) and deposit slip submitted to the Treasurer's office. The Treasurer's office then returns a stamped copy of the RCF and a copy of the deposit slip to Budget and Finance. These copies are attached to the backup documentation for the deposit which includes check copies and receipts.*

3.2 *This recommendation has been implemented.*

*Employees have received re-instruction on correct procedures. Checks and money orders are restrictively endorsed upon receipt by the Police Academy, Prisoner Processing section, and Records Division. Police Academy deposits are picked up weekly by Budget and Finance and taken to the Treasurer's office for deposit. Fugitive bond account deposits are made twice per week by a commissioned officer.*

3.3 *This recommendation has been implemented.*

*Employees have received re-instruction on correct procedures. After 90 days unclaimed payroll checks are returned to the Treasurer's office. The two remaining outstanding payroll checks have been returned to City Hall. These two checks were payable to deceased employees and can't be released without proper court documentation. Outstanding fugitive bond account checks are in the process of being sent to the state's unclaimed property division. Bank service charges are reimbursed to the Fugitive Bond Account on a monthly basis.*

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## **4. Vehicle Maintenance and Use Allowance**

The Building Division and St. Louis Fire Department (STLFD) procedures for authorizing and calculating monthly vehicle maintenance and use allowances (vehicle allowances) need improvement. During the fiscal year ended June 30, 2019, the city paid approximately \$381,900 to DPS employees for monthly vehicle allowances.

### **4.1 Application of policies**

The 3 DPS sections that provide monthly vehicle allowances (Building division, Fire department, and Neighborhood Stabilization team) interpret when allowance amounts should be reduced by ordinance differently. As a result, allowance payment amounts vary and Building Division and STLFD allowances may not be reduced as required.

The city's compensation ordinance, codified in city code section 4.10.020, states city employees who are required by their appointing authority to routinely use their personal vehicle in the performance of their job duties shall be compensated by receiving a vehicle allowance of \$270 per month. The



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ordinance also states that eligible employees who use their personal vehicle with reduced frequency shall be entitled to a vehicle allowance that is reduced in proportion to the reduced frequency of use.

In order for DPS employees to receive the vehicle allowance, the applicable division's payroll section submits a listing of employees and allowance amounts monthly to the Comptroller's office.

Building division

The Building Division Commissioner indicated the division only reduces the monthly vehicle allowance if an employee does not physically work more than 10 days during a month. Records provided indicated all employees received the full monthly vehicle allowance during fiscal year 2019. The city paid monthly vehicle allowances totaling approximately \$292,800 to Building division employees during fiscal year 2019. The number of division employees receiving the allowance averaged about 90 employees per month.

Fire department

The St. Louis Fire Department (STLFD) Fiscal Services Manager indicated the department does not reduce the monthly vehicle allowance for any employees because they are considered to be on-call emergency personnel and respond to calls even when off duty or on vacation. Records provided indicated all employees received the full monthly vehicle allowance during fiscal year 2019. The city paid monthly vehicle allowances totaling approximately \$18,400 to 7 STLFD employees during fiscal year 2019.

Neighborhood Stabilization team

The Neighborhood Stabilization Team's Office Specialist indicated the division reduces the monthly vehicle allowance proportionately for every 40 hours an employee does not physically work. For example, if an employee did not physically work 40 hours in a given month, his/her monthly vehicle allowance would be paid an allowance of \$202.50 (75 percent). We noted that at least 1 employee per month, and often several employees, received a pro-rated vehicle allowance during fiscal year 2019. The city paid monthly vehicle allowances totaling approximately \$70,700 to 27 Neighborhood Stabilization team employees during fiscal year 2019.

Conclusion

To ensure vehicle allowances are properly paid in a fair and equitable manner, the DPS should ensure the provisions governing vehicle allowances are consistently applied.

4.2 Overpayment

STLFD procedures for monitoring employee eligibility for the monthly vehicle allowance need improvement.

As a result of our inquiries regarding the accuracy and completeness of data provided by the STLFD of vehicle allowances paid, the Fiscal Services Manager identified one employee who continued to receive a monthly vehicle allowance in error. Effective February 2019, this employee was promoted to Acting Captain and provided an official department vehicle that he was



allowed to take home for on-call purposes. However, he continued to receive the monthly vehicle allowance from February 2019 through February 2020, resulting in an overpayment of \$3,510. The Fiscal Services Manager indicated a lack of communication at the time of the employee's promotion allowed the error to occur, and the department has initiated the process of recovering the overpayment.

To ensure only eligible employees receive the vehicle allowance the STLFD should review division payroll records prior to sending the payment request to the Comptroller.

## Recommendation

- 4.1 The Building Division and STLFD review and consistently apply the city ordinances governing monthly vehicle allowances.
- 4.2 The STLFD establish procedures to ensure only eligible employees receive the monthly vehicle allowance.

## Auditee's Response

- 4.1 *This recommendation has been implemented.*

*The Director of Public Safety sent out Executive Memorandum No. 17 instructing all divisions to review their Vehicle Maintenance and Use Allowance policy and procedures and, if required, implement any changes necessary to be in compliance with the city's compensation ordinance. The memorandum also included a rate chart that could be used to calculate allowance reductions in proportion to the reduced frequency of use.*

- 4.2 *This recommendation has been implemented.*

*The STLFD's Administrative Office developed a monthly automobile allowance log to track who is eligible to receive the allowance and for how many days.*

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## 5. Expenditures

Some DPS departments did not prepare disbursement vouchers timely, and as a result, one department paid unnecessary late fees.

As invoices and other supporting documentation for expenditures are received, the documents are reviewed, approved for payment, and a disbursement voucher is prepared. Upon completion of the disbursement voucher, it is submitted to the Comptroller's office for recording in the city's general ledger and for payment.

During our review of expenditures we reviewed invoices, receipts, disbursement vouchers, and other supporting documentation. We reviewed 92 SLMPD and 53 STLFD expenditures from fiscal years 2018 and 2019 and identified the following issues:



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- The SLMPD held 10 invoices, totaling over \$27,000, from the same vendor for up to 11 months before creating and sending a disbursement voucher to the Comptroller's office for payment. Invoices held were dated the last calendar day of January 2017 through November 2017, excluding September 2017. The late fees payment for these invoices totaled approximately \$1,100.

SLMPD Budget and Finance division officials indicated they held these invoices because they had to pay unexpected consulting services expenditures from the professional services budget. The consulting services were part of an agreement with the former Chief of Police upon his resignation in April 2017. The agreement included a provision for the former Chief to provide consulting services for a 1-year period and receive bi-weekly payments at his previous annual salary. Due to the timing of the agreement, these expenditures were not budgeted for fiscal year 2017 or fiscal year 2018.

Division officials indicated and the city's Budget division verified the SLMPD initiated a budget transfer in December 2017, more than 10 months after the first vendor invoice was received. This was also more than 7 months after the start of the unexpected consulting agreement. SLMPD personnel prepared the disbursement voucher for these 10 invoices soon after the transfer was approved; however, as previously noted, the disbursement vouchers were prepared up to 11 months after the invoices were received and the department had already incurred late fees.

The SLMPD held an invoice for global positioning system tracking for almost 9 months and another invoice for new fitness equipment for more than 3 months before preparing disbursement vouchers and submitting them to the Comptroller's office for payment. Personnel could not explain why these invoices were not processed timely.

- The STLFD did not process 5 of the 12 emergency medical services billing services invoices timely. These invoices were held for 38 to 77 days before preparing and submitting a disbursement voucher to the Comptroller's office for payment.

To prevent unnecessary late fees, procedures should be in place to ensure disbursement vouchers are prepared and submitted timely to the Comptroller's office for payment. When necessary, budget transfers should be requested timely to minimize any delay in paying vendors.

## Recommendation

The SLMPD and STLFD prepare disbursement vouchers for expenditures and request budget transfers timely.



## Auditee's Response

*This recommendation has been implemented.*

*The appropriate SLMPD employees have received re-instruction on correct procedures. The SLMPD will submit budget transfer requests within 30 days of an unbudgeted expense and inform city administration when an unbudgeted expense such as additional overtime due to civil unrest has been incurred.*

*The STLFD hired an Emergency Medical Service accountant who, prior to the audit, developed a spreadsheet and has been logging and tracking invoices to ensure payments are prepared and submitted on time.*

## 6. SLMPD Assets

Weaknesses exist in the SLMPD's asset controls and procedures. Per the SLMPD's capital asset listing, the department held land, buildings, vehicles, and other capital assets valued at approximately \$102.7 million at June 30, 2019.

### 6.1 Capital assets

Our review of capital asset records noted items were not always recorded accurately, items were not always tagged or identified as SLMPD property, and some items could not be located.

City and SLMPD policy classify any asset with a value of \$5,000 or more as a capital asset. The Budget and Finance division maintains a centralized capital asset database. This database includes the asset number, description, type, serial number (if applicable), date acquired, location, and acquisition price.

The SLMPD Supply division also tracks most SLMPD capital assets, excluding vehicles, in a separate database. Asset tag numbers are only assigned and tracked in the Supply division database. The Supply division coordinates an annual department-wide capital asset inventory.

We tested 20 capital assets in various locations. We selected 10 capital assets from the Budget and Finance database to trace to the asset location and the other 10 from various SLMPD locations to trace to asset records. Fourteen of the 20 assets should have been included in the Supply division database as well as the Budget and Finance division database. We identified the following issues:

- The Supply division did not accurately record 4 capital assets in its database and 2 of the items, a computer driving simulator and a computer shooting simulator, were classified as missing, in error, by the Supply division in 2014. Supply division personnel indicated the 2 assets are still in use and located in the Police Academy and the division did not receive proper notification when the assets were moved between divisions.



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- One item (surveillance equipment located in an undercover vehicle) observed was not recorded in either the Budget and Finance or Supply division databases but department personnel indicated it was a capital asset.
- One item (SWAT robot) did not have a property tag affixed and the item's serial number was not recorded in the Budget and Finance or the Supply division database. The Supply division database showed a property tag had been assigned.
- One item (digital robot for bomb and arson detection) could not be located.

According to Supply division personnel, the inventory process utilizes Supply division asset records and includes a process for divisions to include additional assets or assets transferred. However, the Supply division's manager indicated divisions do not always follow the instructions provided to each section or unit at the time of the annual inventory or perform an adequate review of their assets. Special Order 2-06 requires that sections or units submit a form to the Supply division for each asset that is moved between sections or units.

Adequate capital asset records and procedures are necessary to provide controls over city property; safeguard city assets that are susceptible to loss, theft, or misuse; and provide a basis for proper financial reporting and insurance coverage. Property control tags should be affixed to all property items to help improve accountability and ensure assets are properly identified as belonging to the city.

## 6.2 Firearms

Armory personnel do not update the firearms database timely and, as a result, the database is not complete and accurate. While firearms do not meet the city's definition of a capital asset, the department tracks them due to the nature of the items and susceptibility to loss or theft.

The firearms database includes various identifying information such as serial number, make, and model; the status of the firearm such as issued, safekeeping, in-stock, and other; and the name of the officer to whom the firearm is issued, if applicable. In order for the department to keep accurate records, Armory personnel are required to update the database for all changes such as issuing a firearm to an officer, new purchases, disposals, and firearms needing repair.

Our review identified 5 of 15 (33 percent) firearms tested were sold by the SLMPD in 2017 but still listed as "in-stock" in the database. According to SLMPD personnel, the department sold approximately 2,500 firearms during 2017; however, the Armory did not update the firearms database and these



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firearms were still listed as "in-stock" at the time of our review. Also, 1 of 15 (7 percent) firearms tested was listed as "in-stock" in the database but other records indicated it had been issued to a police officer.

Timely updates to firearms records are necessary to ensure records are complete and accurate and safeguard sensitive city assets that are susceptible to loss, theft, or misuse.

### 6.3 Computer equipment inventory

Approximately \$439,000 of computer equipment purchased between 2005 and 2019 was stored at the SLMPD's Supply division warehouse at June 30, 2019. The equipment includes central processing units, printers, and scanners. Department personnel indicated that, through consultation with the city's Information Technology Services Agency (ITSA), purchased items are placed in the usage rotation within a reasonable period of time and most items are used or placed in service within 180 days of receipt. Approximately \$53,200 (12 percent) of the equipment was purchased prior to January 2019, and approximately \$21,600 (5 percent) was purchased prior to July 2018. Department personnel could not explain why some equipment on hand had been stored for an extended period of time and not placed in service or otherwise disposed of.

In the *Follow-Up Report on Audit Findings City of St. Louis Department of Public Safety*, Report No. 2018-119, released in November 2018, the department stated the SLMPD employs a common sense, two-pronged approach to maintaining sensible inventory levels. Personnel responsible for ordering computer equipment estimate a quantity that will last no more than a calendar year and can be stored within a reasonable area at the department's Supply division warehouse. However, based on the amount of older inventory on hand, the department is not always adhering to this process.

Acquiring equipment when it is not immediately needed is not a prudent use of public funds. In addition, because of rapid changes in technology, this equipment could be outdated before it is taken out of storage. To ensure computer equipment does not become obsolete before utilized, the SLMPD should refrain from purchasing equipment that cannot be placed into service timely. To increase the probability that the department will be able to recover some costs or otherwise provide a useful benefit to the city, the SLMPD should determine if any stored equipment can be used for immediate city needs and dispose of any unneeded items.

#### Similar conditions previously reported

As noted above, similar conditions were noted in our prior audit report. In the *Follow-Up Report on Audit Findings City of St. Louis Department of Public Safety*, Report No. 2018-119, released in November 2018, the department stated these previous recommendations had been implemented; however, we found that corrective action taken was not always effective and problems continue to exist.



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## Recommendations

The SLMPD:

- 6.1 Ensure complete and detailed capital asset records are maintained that include all pertinent information for each asset. The SLMPD should also ensure SLMPD personnel promptly record asset purchases, transfers, and dispositions in the databases; properly tag all applicable city property; and ensure annual inventories are sufficient to detect errors and review all assets.
- 6.2 Ensure the Armory updates firearm records timely to reflect the current location and status of firearms.
- 6.3 Work with the ITSA to ensure only equipment that is necessary and readily able to be placed into service is purchased. In addition, the SLMPD's Supply division should work with the ITSA to determine if any of the computer equipment in storage can be used by other divisions or other city departments, and dispose of items that cannot be used.

## Auditee's Response

- 6.1 *This recommendation has been implemented.*

*The digital robot for bomb and arson detection was located after the fieldwork for the audit was completed. The supporting documentation was provided to the auditors.*

*The Supply and Budget and Finance divisions will send teams to do annual spot checking at randomly chosen units. Assets at these units will be physically inspected to determine if inventories were performed properly and accurately. Each Unit Commander shall reconcile any discrepancies.*

- 6.2 *This recommendation has been implemented.*

*The Armory has updated its records to reflect the location and status of all firearms. All firearms are accounted for. SLMPD has implemented procedures to ensure records timely and accurately reflect the current location and status of all firearms.*

- 6.3 *This recommendation has been implemented.*

*The Information Technology Services Agency staff will conduct an annual review of equipment stored for more than one year and offer equipment not needed to other city departments.*

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## 7. Time Records

The Building and Corrections divisions do not require timesheets or other documentation for hours worked for some division employees, in violation of city personnel regulations.



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The Building Division Commissioner does not require his Executive Assistant, Payroll Manager, or Payroll Specialist to prepare and submit timesheets. The Corrections Division Commissioner does not require his Payroll Manager, Detention Center Superintendent, or Correctional Program Manager to prepare and submit timesheets. Division personnel indicated these individuals must still submit formal leave requests for approval.

The City of St. Louis Department of Personnel Administrative Regulation No. 134 states "it is the responsibility of each appointing authority to assure that employees on their payroll have actually worked the time for which they are paid" and also states "all departments shall keep daily attendance records." Without timesheets or other daily attendance records, the DPS cannot assure all employees have actually worked the time for which they are paid. Detailed timesheets would document hours actually worked and are beneficial in demonstrating compliance with the city policies.

**Recommendation**

The Building and Corrections divisions require all employees prepare detailed timesheets or other documentation for time worked.

**Auditee's Response**

*This recommendation has been implemented.*

*The Building Division and the Corrections Division now require all employees to prepare detailed timesheets.*

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**8. Sunshine Law**

The Civilian Oversight Board (COB) discussed some topics in closed session that are not allowable under the Sunshine Law. Closed meeting minutes indicate the COB discussed new and existing COB and SLMPD policies and had a guest speaker discuss the SLMPD's search and seizure policy with COB staff and board members.

Section 610.022, RSMo, provides that the discussion topics in closed meetings should be limited to only those specifically allowed by law.

**Recommendation**

The COB ensure only topics allowed by state law are discussed in closed meetings.

**Auditee's Response**

*This recommendation has been implemented.*

*Legal counsel was contacted for advice and Sunshine Law limitations were reviewed with COB Board Members. COB staff is reassessing its agenda content to ensure that matters set for discussion in closed sessions meet the requirements of state law. Cases discussed by the Board involve civilian complainants and accusations against SLMPD officers, so the need for discretion is a serious concern. The Board will likely discuss cases that do not involve discipline in open session, which will require Board members to guard the names of the parties involved with use of generic terminology*



*(Complainant/Officer). While this may create a challenge for the Board it also presents an opportunity for the community to hear more of the particulars regarding complaints that are under review.*

## 9. SLMPD Written Agreements

The SLMPD does not have a formal written agreement with the St. Louis Cardinals for performing bomb and explosive detection services for events held at Busch Stadium. The SLMPD billed and was paid more than \$44,000 for these services during fiscal year 2019. Department officials indicated they have been unable to agree on terms of a written contract because of various legal matters, including ownership of the explosives detection dog. Officials indicated both parties previously entered into a written contract, but at least 5 years have elapsed since that contract expired.

Section 432.070, RSMo, requires contracts for political subdivision to be in writing. Written agreements, signed by the parties involved, should specify the services to be rendered and the manner and amount of compensation to be paid. Written contracts are necessary to ensure all parties are aware of their duties and responsibilities and to prevent misunderstandings.

### Recommendation

The SLMPD enter into written agreements as required by state law.

### Auditee's Response

*This recommendation has been implemented.*

*The SLMPD enters into agreements according to city policy. The contractual issue described is resolved as the SLMPD is no longer providing a detection dog to the Cardinals organization.*

## 10. Fire Department Merchandise Account

The STLFD maintains money in a bank account outside the city treasury, in violation of city charter. The account was established in 2015 with a loan from a not-for-profit organization whose mission is to support the STLFD. The loan was subsequently repaid the following year. The account is used to deposit the proceeds from the sale of STLFD merchandise including shirts, hats, and other logo apparel.

STLFD personnel indicated this account is held outside of the city treasury because no city money is associated with the account. At June 30, 2019, the cash balance of the bank account was approximately \$1,300. The STLFD received approximately \$4,000 from the sale of STLFD merchandise and disbursed approximately \$5,300 from this account during the fiscal year. Purchases included approximately \$3,450 for new merchandise, \$1,600 for hosting community festivals for children, and \$250 for other miscellaneous items. While these purchases seem reasonable, expending money outside of the city's normal budgeting and disbursement process increases the risk of it may be misused or spent unnecessarily.



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The money associated with this account was initially loaned to the STLFD, the STLFD is responsible for purchasing and selling the merchandise, and the STLFD controls the proceeds; therefore, this money looks like it belongs to the city. Article XV, Section 24 of the St. Louis City Charter requires all money belonging to the city received by an officer or agent thereof be deposited daily in the treasury division unless otherwise provided by law or ordinance, and any delinquency in this respect shall be reported promptly by the Treasurer to the Mayor and to the Comptroller.

## Recommendation

The STLFD transfer the balance of the bank account to the Treasurer and close the account.

## Auditee's Response

*This recommendation has been implemented.*

*Merchandise sales are no longer a function of the STLFD. Sales are now handled by the St. Louis Fire Foundation, which is not a city entity. Thus, the St. Louis Fire Foundation, not the STLFD, now maintains and controls the bank account.*

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# City of St. Louis - Department of Public Safety

## Organization and Statistical Information

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The mission of the DPS is to safeguard the city's state of well-being, protect lives and property, and ensure the safety of the individuals who live, work, and visit the city. The DPS consists of the Director's Office and 8 divisions. Jimmie Edwards was appointed as the DPS Director on November 6, 2017.

The DPS is the largest municipal government department and at June 30, 2019, the department had 3,129 full-time and 106 part-time employees.

The department consists of the following sections:

### Director's office

The Director's office is responsible for oversight of the department. The Director serves as the appointing authority for the department divisions, establishes department-wide policy, and provides direction for human resource management. The office also prepares billings for state and federal prisoners, administers federal grants related to public safety, approves dance hall licenses, issues brick dealer licenses, and oversees the contract for issuing burglar alarm permits and false burglar alarm violations.

### St. Louis Metropolitan Police Department

In November 2012, voters approved Proposition A allowing the City of St. Louis to establish a locally controlled municipal police department, replacing the state-controlled police department. The city accepted responsibility, ownership, and liability as successor-in-interest for contractual obligations, indebtedness, and other lawful obligations of the former Board of Police Commissioners of the Police Department on September 1, 2013. Colonel John Hayden, Jr., was appointed Chief of Police (Police Commissioner) on December 28, 2017.

The SLMPD consists of 6 police districts and is organized as follows:

The Office of the Assistant Chief oversees the cadet program, emergency management, asset removal, and special projects.

The Bureau of Community Policing includes the 6 police districts and the associated 3 area stations, district detectives, and the housing authority unit.

The Bureau of Specialized Enforcement includes the special operations investigators; the drug enforcement and intervention, mobile reserve, special weapons and tactics, canine, aviation, and traffic/mounted patrol units; Motor Carrier Safety Assistance Program; park rangers; and the public transportation unit.

The Bureau of Investigative Services includes the homicide, bomb and arson, juvenile, and sex crimes/child abuse units; domestic abuse response team; and police officers assigned to the Circuit Attorney's Office as investigators.



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City of St. Louis - Department of Public Safety  
Organization and Statistical Information

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The Bureau of Professional Standards includes the police academy and police trainees, internal affairs, force investigation unit, private security, planning and research, the Commission on Accreditation for Law Enforcement Agencies, the officer wellness coordinator, and the crime laboratory.

The Police Chief's office oversees the Auxiliary Services section that includes property custody, communications, telephone reporting, records, warrant/fugitive, prisoner processing, and city marshals. The office also oversees the Telephone Solutions and Investigations section that includes various intelligence functions including federal task force officers, real time crime center, crime analysis, and others.

The department also has various other administrative support divisions such as purchasing, supply/uniform, information technology, cybercrime, operational planning, budget and finance, and public information.

The reporting structure listed above is as of the time of the audit. However, department officials indicated the organizational structure is not static and, instead, remains flexible in order to adapt to the changing dynamics within the profession and the community.

#### Fire Department

The Fire department is organized into five bureaus that include Administrative Services, Fire Prevention, Operations, Support Services, and Emergency Medical Services. The department is responsible for fire prevention, fire suppression, and emergency medical services. The department enforces provisions of ordinances for fire prevention, carbon monoxide detectors, smoke detectors, and hazardous materials by reviewing fire protection system plans, inspecting existing structures, and reviewing applications for permits. The department also manages a contract for billing patients for emergency medical services.

#### Excise Division

The Excise division is responsible for the regulation and control of liquor. The division determines licensing in accordance with the city liquor code, authorizes issuance of all liquor and non-intoxicating beer licenses, enforces city liquor laws and ordinances, and initiates civil action to suspend, cancel, or revoke licenses when violations occur.

#### Building Division

The Building division is responsible for ensuring residents and businesses comply with the city's building codes and other national codes that regulate new construction and the maintenance of existing buildings. The division issues trade and occupancy building permits, conducts inspections, demolishes vacant buildings, and enforces zoning ordinances.



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Organization and Statistical Information

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Neighborhood Stabilization Team

The Neighborhood Stabilization Team's mission is to empower constituents to sustain a quality environment within their neighborhood through assistance, education, intervention, and organization. The office employs 24 Neighborhood Improvement Specialists who identify and address issues and provide follow up with Aldermen, citizens, neighborhood groups, block units, police, and other city departments. The office also includes the Citizens' Service Bureau that registers and routes city service requests, answers citizen requests for information, and provides city departments with statistics.

City Emergency Management Agency

The City Emergency Management Agency is responsible for maintaining mitigation, preparedness, response, and recovery programs for disasters or other emergencies. The agency directs the operation and maintenance of the Emergency Operations Center, oversees the operation and maintenance of an outdoor warning siren system, and oversees the operation and maintenance of a free emergency alert mass notification system. The agency is also involved with emergency preparedness training for citizens.

Division of Corrections

The Division of Corrections operates the City Justice Center and Medium Security Institution. The division is responsible for providing for the care, custody, and control of incarcerated individuals.

Civilian Oversight Board

The Civilian Oversight Board is responsible for reviewing and investigating citizen complaints alleging misconduct by SLMPD officers. The board makes independent findings and recommendations on complaints from the community.



Appendix A  
 City of St. Louis - Department of Public Safety  
 Additional Comments Provided by the Department of Public Safety



LYDA KREWSON  
 MAYOR

**City of St. Louis**  
 OFFICE OF THE DIRECTOR  
 DEPARTMENT OF PUBLIC SAFETY  
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JIMMIE M. EDWARDS  
 DIRECTOR

September 3, 2020

Nicole Galloway, CPA  
 Missouri State Auditor  
 State Auditor's Office  
 P.O. Box 869  
 Jefferson City, MO 65102

Dear Ms. Galloway,

Thank you for conducting a thorough audit of the City of St. Louis' Department of Public Safety. Your objective assessment and feedback will help the Department of Public Safety maintain an efficient operation and provide transparency to the public.

The Department has carefully reviewed your recommendations and offers the attached responses. This also confirms that your recommendations to make the Department of Public Safety more accountable and efficient have been implemented.

Four of the Department of Public Safety's operating divisions (Excise, City Emergency Management Agency, Neighborhood Stabilization Team and Director's Office) received no audit findings. Based upon the published evaluation criteria of the Missouri State Auditor, if evaluated individually each of these divisions would receive a rating of EXCELLENT.

The remaining operating divisions including Civilian Oversight Board, Corrections, Building, St. Louis Fire Department and St. Louis Metropolitan Police Department did receive a few audit findings. Your audit recommendations for each of the divisions have been implemented. Based upon the published criteria of the Missouri State Auditor these divisions are also well managed. If evaluated individually, each of these divisions would receive a rating of GOOD.

It is worth noting here that the Commanders of the St. Louis Metropolitan Police Department had already identified, addressed, and corrected several issues involving operations within the department before your audit began. I agree that those issues are important to maintaining an effective operation. Again, thank you for your public service. If you have any questions, please don't hesitate to contact me.

Best regards,

Jimmie Edwards  
 Director of Public Safety

cc: Travis Owens, MBA, CPA, CFE, CGAP  
 Audit Manager

*Building Division • City Emergency Management Agency • Excise Division • Fire Dept./EMS  
 Neighborhood Stabilization/Citizens Service Bureau • Division of Corrections  
 St. Louis Metropolitan Police Department • Civilian Oversight Board  
<http://www.stlouis-mo.gov/government/departments/public-safety/>*



Appendix B

City of St. Louis - Department of Public Safety  
 SLMPD Duplicated Secondary Employment and Duty Hours

Employee Rank	Date	SLMPD (2)		Secondary Employer (2)		Total Hours Duplicated
		Time In (1)	Time Out (1)	Time In (1)	Time Out (1)	
Police Officer	6/22/2019	8:00	18:30	18:00	23:00	0:30
Police Officer	7/3/2018 - 7/4/2018 (3)	8:00	20:01	18:00	0:30	2:01
Police Officer	8/10/2018	6:50	8:50	7:30	15:15	1:20
	8/14/2018	8:00	10:00	7:00	11:00	2:00
	8/15/2018	9:00	10:00	7:00	10:30	1:00
Police Sergeant	8/10/2018	8:00	16:00	7:00	12:00	4:00
	8/25/2018 - 8/26/2018 (4)	23:10	11:11	7:00	12:00	4:11
Police Officer	11/6/2018	8:00	16:00	15:00	19:00	1:00
Total Duplicated Time						16:02

(1) Time in and time out is displayed on a 24 hour clock (military time).

(2) Time presented may not reflect all hours worked for the day. Only the employee's shift hours related to duplicate hours are presented. An employee may work a split shift for the SLMPD and/or their secondary employer.

(3) The police officer's secondary employment shift ended on 7/4/2018; all other shift times were on 7/3/2018.

(4) The police sergeant's SLMPD shift began on 8/25/2018; all other shift times were on 8/26/2018.

Appendix C

City of St. Louis - Department of Public Safety  
 SLMPD Secondary Employment Hours Not Recorded  
 Fiscal Year Ended June 30, 2019

<u>Employee Rank</u>	<u>Period Reviewed (1)</u>	<u>Hours Not Recorded in the Timekeeping System</u>	
Police Lieutenant	August 2018	11.75	
Probationary Police Officer	January 2019	20.00	
Police Officer	July 2018	19.00	
Police Officer	October 2018	12.12	
Police Officer	November 2018	62.50	
Police Officer	December 2018	18.00	
Police Officer	April 2019	16.50	
Police Officer	July 2018	12.00	
Police Officer	September 2018	19.00	
Police Sergeant	August 2018	13.83	
Police Officer	September 2018	40.40	
Police Officer	October 2018	8.00	
Police Officer	November 2018	33.75	
Police Lieutenant	December 2018	10.50	
Police Officer	July 2018	9.75	
Police Officer	August 2018	92.25	
Police Officer	October 2018	57.00	
Police Officer	November 2018	26.00	
Police Officer	December 2018	13.75	
Police Lieutenant	January 2019	4.75	(2)
Police Officer	February 2019	50.02	(2)
Police Officer	March 2019	28.00	(2)
Police Sergeant	August 2018	32.00	
Police Lieutenant	September 2018	38.50	
Police Officer	November 2018	91.83	(2)
Police Officer	April 2019	29.75	(2)
Police Officer	(3)	35.00	
Police Officer	(3)	11.75	(2)
Police Sergeant	(3)	68.47	(2)
Police Officer	(3)	56.26	
Police Officer	(3)	23.75	
		<u>966.18</u>	

(1) For 30 employees, we reviewed documentation from one of their secondary employers for one month. For another 30 employees we reviewed documentation from all of their secondary employers for one month. Finally, based on additional concerns received, we reviewed documentation for 5 employees with the same secondary employer and documentation for the entire fiscal year.

(2) Some hours worked during the period were recorded, The hours presented were not recorded.

(3) The SAO reviewed documentation for all of fiscal year ended June 30, 2019.