AUDIT OF THE COMMUNITY ORIENTED POLICING SERVICES TECHNOLOGY PROGRAM GRANT AWARDED TO THE CITY OF INDIANAPOLIS, INDIANA

U.S. Department of Justice
Office of the Inspector General
Audit Division

Audit Report GR-50-12-005
May 2012
AUDIT OF THE COMMUNITY ORIENTED POLICING SERVICES
TECHNOLOGY PROGRAM GRANT AWARDED TO
THE CITY OF INDIANAPOLIS, INDIANA

EXECUTIVE SUMMARY

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Office of Community Oriented Policing Services (COPS) Technology Program grant number 2007-CK-WX-0035 in the amount of $6,000,000 awarded to the Indianapolis Metropolitan Police Department (IMPD). The COPS Technology Grant Program is designed to assist state, local, and tribal law enforcement agencies to procure technology that enhances the ability to share information with regional, state, and federal partners. Grants are intended to help facilitate the sharing of information across multiple jurisdictions, with the ultimate objective of increasing public safety.

Specifically, the purpose of grant number 2007-CK-WX-0035 was to assist the IMPD to purchase and install: (1) a Computer Aided Dispatch (CAD) System and CAD-to-CAD interfaces, (2) a regional data repository system, and (3) a field records collection system. These systems are designed to aid and assist the IMPD in delivering efficient and systematic community policing services for the entire county.

The purpose of this audit was to determine whether reimbursements claimed for costs under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant, and to determine program performance and accomplishments. The objective of our audit was to review performance in the following areas: (1) internal control environment; (2) drawdowns; (3) grant expenditures, including personnel and indirect costs; (4) budget management and control; (5) matching; (6) property management; (7) program income; (8) federal financial and progress reports; (9) grant requirements; (10) program performance and accomplishments; and (11) monitoring of subgrantees and contractors. We determined that indirect costs, program income, and subgrantees were not applicable to this grant.

Our audit revealed that the IMPD generally complied with COPS grant guidelines and requirements. However, the IMPD had not yet completed the projects in the time allotted by COPS, and the IMPD did not comply with a special condition of the grant, which required the grantee to take part in an
on-site technical visit by a COPS-sponsored contractor. Our report contains one recommendation to address the weakness we identified. Our findings are discussed in the Findings and Recommendations section of the report. Our audit objectives, scope, and methodology are discussed in Appendix I.
# TABLE OF CONTENTS

## INTRODUCTION

- Background ........................................................................................................ 2
- Our Audit Approach ......................................................................................... 3

## FINDINGS AND RECOMMENDATIONS

- Internal Control Environment ........................................................................ 4
- Drawdowns ....................................................................................................... 5
- Transaction Testing .......................................................................................... 5
- Budget Management and Control ..................................................................... 5
- Matching Costs .................................................................................................. 6
- Accountable Property ....................................................................................... 7
- Reports ............................................................................................................... 7
- Compliance with Grant Requirements .............................................................. 9
- Program Performance and Accomplishments ............................................... 10
- Monitoring Contractors .................................................................................. 11
- Views of Responsible Officials ......................................................................... 12
- Recommendations ......................................................................................... 12

## APPENDIX I - OBJECTIVES, SCOPE, AND METHODOLOGY

13

## APPENDIX II - AUDITEE RESPONSE

15

## APPENDIX III - OFFICE OF COMMUNITY ORIENTED POLICING SERVICES RESPONSE

16

## APPENDIX IV - OFFICE OF THE INSPECTOR GENERAL

ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

18
INTRODUCTION

The Office of the Inspector General (OIG), Audit Division, has completed an audit of the Office of Community Oriented Policing Services (COPS) Technology Program grant number 2007-CK-WX-0035 in the amount of $6,000,000 awarded to the Indianapolis Metropolitan Police Department (IMPD). The COPS Technology grant program is designed to assist state, local, and tribal law enforcement agencies to procure technology that enhances the ability to share information with regional, state, and federal partners. Grants are intended to help facilitate the sharing of information across multiple jurisdictions, with the ultimate objective of increasing public safety.

Specifically, the purpose of grant number 2007-CK-WX-0035 was to assist the IMPD to purchase and install a Computer Aided Dispatch (CAD) System and CAD-to-CAD interfaces, and to purchase and install a regional data repository system and field records collection system. These systems are designed to aid and assist the IMPD in delivering efficient and systematic community policing services for the entire county.

The purpose of this audit was to determine whether reimbursements claimed for costs under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant, and to determine program performance and accomplishments. The objective of our audit was to review performance in the following areas: (1) internal control environment; (2) drawdowns; (3) grant expenditures, including personnel and indirect costs; (4) budget management and control; (5) matching; (6) property management; (7) program income; (8) federal financial and progress reports; (9) grant requirements; (10) program performance and accomplishments; and (11) monitoring of subgrantees and contractors. We determined that indirect costs, program income, and subgrantees were not applicable to this grant. As shown in the following table, the IMPD was awarded a total of $6,000,000 to implement the grant program.
TABLE 1 – INDIANAPOLIS METROPOLITAN POLICE DEPARTMENT
GRANT 2007-CK-WX-00351

<table>
<thead>
<tr>
<th>Grant Award</th>
<th>Award Start Date</th>
<th>Award End Date</th>
<th>Award Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>2007-CK-WX-0035</td>
<td>09/01/07</td>
<td>02/28/14</td>
<td>$6,000,000</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td></td>
<td></td>
<td><strong>$6,000,000</strong></td>
</tr>
</tbody>
</table>

Source: COPS

Background

COPS was established as a result of the Violent Crime Control and Law Enforcement Act of 1994 to assist law enforcement agencies in enhancing public safety through the implementation of community policing strategies in jurisdictions of all sizes across the country. Community policing represents a shift from more traditional law enforcement in that it focuses on prevention of crime and the fear of crime on a local basis. Community policing puts law enforcement professionals on the streets and assigns them a beat so they can build mutually beneficial relationships with the people they serve.

The city of Indianapolis is centrally located in the state of Indiana, is the state capital, and had a population of 829,618 as of the 2010 U.S. Census. In addition, the metropolitan area, consisting of Indianapolis and the surrounding municipalities, had a population of 1,756,241 as of the 2010 U.S. Census. In January 2007, the former Indianapolis Police Department and the Marion County Sheriff merged law enforcement functions to form the Indianapolis Metropolitan Police Department (IMPD) and serves the entire county.

In 1989, the Metropolitan Emergency Communications Agency (MECA) was created in response to local communications failures to coordinate communication among public safety agencies. MECA is the government entity responsible for developing, implementing, and maintaining a countywide public safety communication system (PSCS) on behalf of participating federal, state, and local public health and safety agencies. The PSCS consists of an integrated public emergency communications system that includes enhanced 911 landline and wireless systems, computer-aided dispatch, radio communications, mobile data operations, paging, and public safety-oriented records management. Eighty-five agencies participate in MECA, including the 50 law enforcement agencies and 12 fire departments serving Marion County.

1 The award end date includes no-cost extensions granted by COPS.
Our Audit Approach

We tested compliance with what we consider to be the most important conditions of the grant. Unless otherwise stated in our report, the criteria we audit against are contained in the COPS 2007 Technology Program Grant Owner’s Manual and the grant award documents.

In conducting our audit, we performed sample testing in four areas: (1) drawdowns, (2) grant expenditures, (3) matching, and (4) asset management. In addition, we reviewed the timeliness and accuracy of Federal Financial Reports (FFR) and progress reports, evaluated performance to grant objectives, and reviewed the internal controls of the financial management system. Our audit objectives, scope, and methodology are discussed in Appendix I.
FINDINGS AND RECOMMENDATIONS

The IMPD generally complied with COPS grant guidelines with respect to internal control environment, drawdowns, grant expenditures, budget management and control, matching, property management, federal financial and progress reports, grant requirements, and monitoring of contractors. However, while the goals and objectives of the grant have been accomplished for the field records collection system and were nearing completion for the regional data repository system, the planned CAD system has yet to be implemented. Additionally, the IMPD did not comply with a special condition of the grant, which required the grantee to take part in a technical assistance site visit by a COPS-sponsored contractor.

Internal Control Environment

We reviewed the IMPD’s financial management system, policies, and procedures to assess its risk of non-compliance with laws, regulations, guidelines, and terms and conditions of the grant. We also interviewed individuals who were involved with the grants, such as grant project management and accounting personnel, and we evaluated grant management practices to further assess risk.

Single Audit

Office of Management and Budget (OMB) Circular A-133 requires grantees to perform a Single Audit if federal expenditures exceed $500,000 in a year. We determined that IMPD was required to have a Single Audit performed in 2009 and 2010, and we reviewed these reports.

The Single Audit Reports were prepared under the provisions of Office of Management and Budget Circular A-133. We reviewed the independent auditor’s assessments, which disclosed no weaknesses, noncompliance issues, or cross-cutting findings related to IMPD grant management.

Financial Management System

We did not identify any weakness in the internal controls over the IMPD’s financial management system. There was sufficient separation of duties, and the operating procedures were documented.
Drawdowns

Grant officials stated that drawdowns were based on actual expenditures in the accounting records. As shown below, we reviewed the accounting records and compared expenditures to the actual drawdowns and found that the drawdowns matched the expenditures. There were no excess drawdowns.

TABLE 2 – DRAWDOWNS VERSUS ACCOUNTING RECORDS

<table>
<thead>
<tr>
<th>Date of Drawdown Per COPS</th>
<th>Amount Drawn Per COPS</th>
<th>Grant Expenditures per Accounting Records for Drawdown Period</th>
<th>Cumulative Drawdowns per COPS</th>
<th>Cumulative Expenditures per Accounting Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/14/2008</td>
<td>$3,273.95</td>
<td>$3,273.95</td>
<td>$3,273.95</td>
<td>$3,273.95</td>
</tr>
<tr>
<td>06/04/2009</td>
<td>691.96</td>
<td>691.96</td>
<td>3,965.91</td>
<td>3,965.91</td>
</tr>
<tr>
<td>08/07/2009</td>
<td>1,180,271.54</td>
<td>1,180,271.54</td>
<td>1,184,237.45</td>
<td>1,184,237.45</td>
</tr>
<tr>
<td>05/14/2010</td>
<td>25,657.08</td>
<td>25,657.08</td>
<td>1,209,894.53</td>
<td>1,209,894.53</td>
</tr>
<tr>
<td>08/12/2010</td>
<td>57,563.07</td>
<td>57,563.07</td>
<td>1,267,457.60</td>
<td>1,267,457.60</td>
</tr>
<tr>
<td>11/17/2010</td>
<td>57,753.53</td>
<td>57,753.53</td>
<td>1,325,211.13</td>
<td>1,325,211.13</td>
</tr>
<tr>
<td>02/22/2011</td>
<td>131,904.17</td>
<td>131,904.17</td>
<td>1,457,115.30</td>
<td>1,457,115.30</td>
</tr>
<tr>
<td>05/09/2011</td>
<td>634,090.55</td>
<td>634,090.55</td>
<td>2,091,205.85</td>
<td>2,091,205.85</td>
</tr>
</tbody>
</table>

Source: IMPD accounting records & COPS drawdown records

Transaction Testing

We reviewed the general ledger account designated for the grant and found there were a total of 224 transactions totaling $2,462,225 from FY 2008 through FY 2011.\(^2\) We selected a judgmental sample of 25 transactions charged to the grant for a total dollar amount of $1,941,873. Overall, we reviewed 79 percent of the grant expenditures and found that they were properly authorized, classified, supported, and charged to the grant.

Budget Management and Control

The grant award’s total project costs were identified as $8 million, including $6 million in federal funds and a local match of $2 million. As of July 28, 2010, the IMPD’s budget contained personnel and fringe amounts to hire two programmers for the

\(^2\) These transactions include matching funds spent.
regional data repository project (COPLINK), a small amount for travel to attend the required COPS Technology Program Advanced Training Workshop, and other money to cover the purchase of software. The bulk of the budget was for the purchase of equipment, supplies, and payment to the contractors to implement the three grant projects. We assessed the grantee’s expenditures in the budget categories, and we determined that the IMPD adhered to the grant requirement to spend grant funds within the approved budget categories. The following table identifies each of the budget items and the amount that the IMPD has spent as of our fieldwork in June 2011.

<table>
<thead>
<tr>
<th>COST CATEGORY</th>
<th>GRANT BUDGET</th>
<th>ACTUAL COST</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$145,354</td>
<td>$64,049</td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td>50,278</td>
<td>16,180</td>
</tr>
<tr>
<td>Travel</td>
<td>7,000</td>
<td>4,489</td>
</tr>
<tr>
<td>Equipment</td>
<td>2,239,560</td>
<td>-</td>
</tr>
<tr>
<td>Supplies</td>
<td>1,179,749</td>
<td>1,179,749</td>
</tr>
<tr>
<td>Construction</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Contracts/Consultants</td>
<td>4,253,060</td>
<td>1,197,758</td>
</tr>
<tr>
<td>Other</td>
<td>125,000</td>
<td>-</td>
</tr>
<tr>
<td><strong>TOTAL DIRECT COSTS</strong></td>
<td>$8,000,000</td>
<td>$2,462,225</td>
</tr>
<tr>
<td>Indirect Costs</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>$8,000,000</strong></td>
<td><strong>$2,462,225</strong></td>
</tr>
<tr>
<td><strong>FEDERAL FUNDS</strong></td>
<td>6,000,000</td>
<td>2,067,455</td>
</tr>
<tr>
<td><strong>LOCAL MATCH</strong></td>
<td><strong>$2,000,000</strong></td>
<td><strong>$394,770</strong></td>
</tr>
</tbody>
</table>

Source: COPS and IMPD Accounting Records

**Matching Costs**

As shown in Table 3 above, under grant number 2007-CK-WX-0035, the IMPD was required to provide $2 million in local matching funds, which represents 25 percent of the total project budget of $8 million. At the time of our audit, project expenditures were $2,462,225 and the match contribution was $394,770, which represented 16 percent of total expenditures. The IMPD’s Grants
Financial Analyst stated that the city borrowed money through a bond to ensure the entire match amount would be met. We reviewed the eight matching transactions for allowability and supporting documentation and found no discrepancies.

**Accountable Property**

OMB Circular A-133 and 28 C.F.R. § 66.32 (2009) require grantees to implement controls to ensure property and equipment purchased with federal funds are properly safeguarded against loss and from unauthorized use or disposition. As noted in the Budget Management and Control section, and as illustrated in Table 3, $2,239,560 had been budgeted for equipment, but the equipment was not yet purchased. However, the IMPD purchased the COPLINK software for $769,599, which met the criteria for IMPD accountable property and was included in the Contracts cost category in Table 3. We reviewed the IMPD’s records for accountable equipment and verified that the COPLINK software was: (1) recorded in the inventory, (2) identified as federally funded, (3) physically present, and (4) used as required by the grant award documentation. During this review, we found no discrepancies in the property records.

**Reports**

According to the COPS 2007 Technology Program Grant Owner’s Manual, award recipients are required to submit both financial and program progress reports. These reports describe the status of the funds and the project, compare actual accomplishments to objectives, and report other pertinent information. We reviewed Federal Financial Reports (FFR) and annual Progress Reports, and found the FFRs and Progress Reports were generally timely and accurate.

**Federal Financial Reports**

COPS requires grantees to submit FFRs no later than 30 days after the end of each quarter. We reviewed the four most recently submitted FFRs at the time of our fieldwork and found all four were submitted timely, as shown in Table 4.

---

3 According to the COPS 2007 Technology Program Grant Owner’s Manual, matching contributions may be applied at any time during the life of the grant, provided that the full matching share is obligated by the end of the grant period.
We also reviewed the last four FFRs for accuracy and found that the reports accurately reflected grant-funded expenditures for three of the four reporting periods, as shown in Table 5.

**TABLE 5 - FEDERAL FINANCIAL REPORT ACCURACY**

<table>
<thead>
<tr>
<th>REPORT PERIOD FROM - TO DATES</th>
<th>EXPENDITURES PER FFR</th>
<th>EXPENDITURES PER ACCOUNTING RECORDS</th>
<th>DIFFERENCE BETWEEN FFRS &amp; ACCOUNTING RECORDS</th>
</tr>
</thead>
<tbody>
<tr>
<td>04/01/10 - 06/30/10</td>
<td>$57,563</td>
<td>$57,563</td>
<td>$0</td>
</tr>
<tr>
<td>07/01/10 - 09/30/10</td>
<td>70,308</td>
<td>70,308</td>
<td>0</td>
</tr>
<tr>
<td>10/01/10 - 12/31/10</td>
<td>131,904</td>
<td>131,904</td>
<td>0</td>
</tr>
<tr>
<td>01/01/11 - 03/31/11</td>
<td>634,632</td>
<td>634,091</td>
<td>541</td>
</tr>
</tbody>
</table>

Source: COPS and IMPD accounting records

The most recent quarterly report we reviewed over-reported expenditures by $541. We discussed this inaccuracy with the Grants Financial Analyst who explained that an error was made and that she would correct it when she submitted the next FFR. We obtained the subsequent FFR and related accounting records and confirmed that the $541 error had been corrected.

**Program Progress Reports**

According to the COPS 2007 Technology Program Grant Owner’s Manual, progress reports are due annually to COPS by January 30. We reviewed the two most recent progress reports and found that the 2009 progress report was submitted timely, and the 2010 progress report was submitted 5 days late, as shown in Table 6. The IMPD provided evidence that it attempted to transmit its 2010 progress report to COPS 2 days prior to the date it was due, but received an error message from COPS. We therefore do not consider the 2010 Progress Report to be late.
TABLE 6 - PROGRESS REPORT HISTORY

<table>
<thead>
<tr>
<th>REPORT PERIOD FROM - TO DATES</th>
<th>DUE DATE</th>
<th>DATE SUBMITTED</th>
<th>DAYS LATE</th>
</tr>
</thead>
<tbody>
<tr>
<td>01/01/09 - 12/31/09</td>
<td>01/30/2010</td>
<td>01/19/2010</td>
<td>0</td>
</tr>
<tr>
<td>01/01/10 - 12/31/10</td>
<td>02/06/2011</td>
<td>02/11/2011</td>
<td>5</td>
</tr>
</tbody>
</table>

Source: COPS

The reports we reviewed appeared to be acceptable in form and content; reports were completed in a survey format rating a series of program performance statements on a scale of 1 to 10. The reports we reviewed were completed fully and appeared relevant to performance of the grant-funded program.

Compliance with Grant Requirements

We reviewed the special conditions of the grant award and found there were two key requirements: (1) attendance at the COPS technical assistance "kickoff" conference by the grantee, and (2) organizing a technical assistance site visit by a COPS-funded National Technical Assistance Program. We found that four IMPD employees attended the COPS technical assistance "kickoff" conference in December 2007. However, the IMPD did not take part in the technical assistance site visit as required. According to the IMPD, by the time IMPD officials attempted to schedule the visit, the COPS Office’s agreement with the organization that was to provide the site visit had ended and, as a result, the IMPD was unable to meet this mandatory requirement of the grant.

We were provided documentation by COPS that it notified the IMPD that it had not complied with this particular grant requirement. Specifically, in a letter dated April 2011, COPS informed the IMPD that if the grantee did not schedule the required site visit, it would be found in violation of the grant condition. The letter also stated that a finding of noncompliance could result in “a suspension and/or termination of grant funds, a bar from receiving new COPS grant awards, and/or other available legal remedies.”

In March 2011, we informed COPS of the IMPD’s non-compliance with the special condition of the grant. COPS informed us that the result of not complying with the special condition is that the grantee failed to take advantage of a “unique opportunity in having subject matter experts provide highly customized technical assistance.” In addition, the grantee “did not receive a comprehensive report
evaluating their project implementation plan and they did not receive specific guidance for project improvements.”

Because the IMPD did not take part in the technical assistance site visit, we recommend that COPS remedy the IMPD’s noncompliance with this requirement. COPS advised us that it is currently reviewing the IMPD’s non-compliance with the grant condition.

**Program Performance and Accomplishments**

According to the award documentation, the purpose of the grant was to build a regional information collection and sharing system to improve data interoperability within the region. This would be achieved by the purchase of three equipment/software systems:

- a Computer Aided Dispatch (CAD) System and CAD-to-CAD interfaces,
- a Regional Data Repository (COPLINK), and
- a Field Records Collection System (E-TICKET).

According to IMPD’s grant application, the CAD System will allow interested agencies to participate in the development of a regional dispatching system. In addition, the proposed CAD system will incorporate a CAD-to-CAD message switch to share incident information with agencies that prefer to remain on their existing legacy systems. This will improve the timeliness and coordination of multi-jurisdictional responses in the region. According to IMPD officials, due to numerous changes in the organizational structure and mergers, this project has not yet been implemented. The IMPD provided documentation that a request was submitted to COPS for a 2-year no-cost grant extension to complete this project. The request included the IMPD’s new timeline and included: (1) vendor selection, (2) contract negotiation and signing, (3) development of implementation plan and schedule, (4) data backups/hardware installation, (5) software installation, (6) integration with existing systems, (7) development of strategy for data conversion, (8) implementation of data conversion, (9) technical training for support staff, (10) parallel systems operation and verification of system performance, (11) user training, and (12) transition to new system. COPS approved the request for the grant to be extended to February 28, 2014.
Additionally, according to the grant application, the Integrated Regional Information System (IRIS) Project using the COPLINK software solution will contain a regional records repository that can store relevant public safety information for all counties involved in the project. This system will allow intelligence information to be gathered in a uniform manner throughout the region. Data from simple traffic stops to complex criminal investigations will be shared by all participating jurisdictions with the development of a common data repository. This will improve the IMPD’s access to information and increase the ability to monitor and apprehend criminals. At the time of our audit, most of the data sources had been implemented into the COPLINK system, but the IMPD had received only half of the support staff technical training. The IMPD was still in the process of delivering the training to 1,900 users and integrating additional data sources into COPLINK, which was estimated to be fully complete in January 2013.

Finally, according to the grant application, the E-TICKET system will give police officers card reader scanning devices and field printers in police cars. Police officers will have the ability to scan the barcode on Real ID-compliant driver’s licenses or ID Cards and initiate an inquiry into the newly created regional database and other systems that can identify if drivers have arrest warrants against them. By querying investigatory and report files, officers can develop better investigatory assessments about potential criminal or terrorist activity. This new system was fully implemented at the time of our audit, and monthly statistics showed that the rate of use was increasing.

Through interviews with appropriate officials and review of supporting documents provided, we were able to confirm that the goals and objectives of the grant, as well as the specific objectives presented by the Program Managers, have been accomplished for the E-TICKET system and were nearing completion for the COPLINK system. However, the planned CAD system has yet to be implemented.

**Monitoring Contractors**

According to the OJP Financial Guide, 2009, grantees should ensure that they monitor organizations under contract to them in a manner that will ensure compliance with their own overall financial management requirements. The IMPD Program Managers stated that the city’s legal department and purchasing process covers any pre-award evaluation of the contractor’s financial management system and associated policies, procedures, and internal controls.
Currently, the IMPD Project Managers monitor contractor performance through regular meetings with the contractors, working closely together, and reviewing status reports. The IMPD Program Managers provide oversight through a variety of methods, including: (1) on-site reviews, (2) phone calls, (3) e-mails, (4) conference calls, and (5) web meetings. The IMPD Project Managers review the progress-based payment schedule to verify work billed was performed and that all expenses are allowable and reasonable. In our opinion, the IMPD’s oversight of contractors appeared to be adequate.

**Views of Responsible Officials**

We discussed the results of our review with grantee officials throughout the audit and at a formal exit conference, and we have included their comments as appropriate.

**Recommendations**

We recommend that COPS:

1. Remedy the IMPD’s non-compliance with the special condition of the grant requiring it to schedule a technical assistance site visit.
OBJECTIVES, SCOPE, AND METHODOLOGY

The purpose of this audit was to determine whether reimbursements claimed for costs under the grant were allowable, supported, and in accordance with applicable laws, regulations, guidelines, and terms and conditions of the grant and to determine program performance and accomplishments. The objective of our audit was to review performance in the following areas: (1) internal control environment; (2) drawdowns; (3) grant expenditures, including personnel and indirect costs; (4) budget management and control; (5) matching; (6) property management; (7) program income; (8) federal financial and progress reports; (9) grant requirements; (10) program performance and accomplishments; and (11) monitoring of subgrantees and contractors. We determined that indirect costs, program income, and subgrantees were not applicable to this grant.

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. Our audit concentrated on, but was not limited to, the award of the grant on September 1, 2007, through June 6, 2011. This was an audit of IMPD COPS Technology grant number 2007-CK-WX-0035. IMPD had a total of $2,091,206 in drawdowns through May 9, 2011.

We tested compliance with what we consider to be the most important conditions of the grant. Unless otherwise stated in our report, the criteria we audit against are contained in the Office of Justice Programs Financial Guide, the COPS 2007 Technology Program Grant Owner’s Manual, and the award documents.

In conducting our audit, we performed testing in four areas: (1) drawdowns, (2) grant expenditures, (3) matching, and (4) property management. In this effort, we employed a judgmental sampling design to obtain broad exposure to numerous facets of the grants reviewed, such as dollar amounts or expenditure category. We selected 8 drawdowns, 25 grant expenditures, 8 matching expenditures, and 1 item of accountable equipment for review. This non-statistical sample design does not allow projection of the test results to the universes from which the samples were selected.
In addition, we reviewed the timeliness and accuracy of FFRs and Progress Reports, and we evaluated IMPD’s performance as it related to grant objectives. However, we did not test the reliability of the financial management system as a whole.
April 23, 2012

Ms. Lashon M. Hilliard
Management Analyst
U.S. Department of Justice
COPS Audit Liaison Division
145 N Street, N.E.
Washington, DC 20530

Dear Ms. Hilliard:

I am in receipt of the Draft Audit Report – Audit of the Office of Community Oriented Policing Services Technology Program Grant dated April 3, 2012 (hereafter “Audit”). The Audit makes one (1) recommendation, specifically:

“Remedy the IMPD’s non-compliance with the special condition of the grant requiring it to schedule a technical assistance site visit.”

Draft Audit Report, pg. 12. The City of Indianapolis concurs with the recommendation made by Office of Inspector General (OIG) in the aforementioned Audit. The City of Indianapolis plans to schedule a technical assistance site visit. The City understands that by taking advantage of this opportunity, it will have the ability to utilize subject matter experts that will provide highly customized technical assistance. The City anticipates it will schedule this technical assistance site visit on or before July 1, 2012.

Should you have any additional questions, please feel free to contact me.

Sincerely,

[Signature]

Frank G. Straub
MEMORANDUM

Via E-Mail and U.S. Mail

To: Carol S. Taraszka
   Regional Audit Manager
   Office of the Inspector General
   Chicago Regional Audit Office

From: Tasana M. Hilliard
       Management Analyst
       COPS Audit Liaison Division

Date: May 23, 2012

Subject: Response to the Draft Audit Report for the Technology Program Grant to the Indianapolis Metropolitan Police Department, Indianapolis, Indiana, COPS Grant Number 2007:CK-WX0035; ORI INPD010

This memorandum is in response to your draft audit report, dated April 3, 2012, for the Indianapolis Metropolitan Police Department (IMPD), Indianapolis, Indiana. For ease of review, each audit recommendation is stated in bold and underlined, followed by COPS' response to the recommendation.

Recommendation 1: Remedy the IMPD's non-compliance with the special condition of the grant requiring it to schedule a technical assistance site visit.

Discussion and Planned Actions

COPS concurs that IMPD should have scheduled a technical assistance site visit over the grant implementation life cycle in order to meet the mandatory Training-Special Condition.

After review of your report, and the response from IMPD, COPS has determined that although IMPD failed to schedule/receive a technical assistance site visit from SEARCH, it did not appear to have a material effect on or during IMPD's implementation of their COPS technology award. However, the City of Indianapolis and IMPD understand that taking advantage of the "customized technical assistance" will provide an opportunity to use subject matter experts and therefore anticipate scheduling the technical assistance site visit on or before July 1, 2012.

ADVANCING PUBLIC SAFETY THROUGH COMMUNITY POLICING
Request

Based on the discussion and planned actions, COPS requests resolution of Recommendation 1.

The COPS Office would like to thank you for the opportunity to review and respond to the draft audit report. If you have any questions, please contact me at (202) 514-6563.

c/c: Carol S. Tarasza (copy provided electronically)
Regional Audit Manager
Office of the Inspector General
Chicago Regional Audit Office

Louise H. Duhamel, Ph. D (copy provided electronically)
Acting Assistant Director, Audit Liaison Group
Internal Review and Evaluation Office
Justice Management Division

Marcia O. Samuels-Campbell (copy provided electronically)
Acting Deputy Director for Operations
Audit Liaison Division
Office of Community Oriented Policing Services (COPS)

Martha Yocito (copy provided electronically)
Audit Liaison
COPS Audit Liaison Division

Nancy J. Daniels (copy provided electronically)
Administrative Assistant
COPS Audit Liaison Division

Audit File Copy

ORI: INIP:010
OFFICE OF THE INSPECTOR GENERAL ANALYSIS AND SUMMARY OF ACTIONS NECESSARY TO CLOSE THE REPORT

The Office of the Inspector General (OIG), Audit Division, provided a draft of this audit report to the Indiana Metropolitan Police Department (IMPD) and the Office of Community Oriented Policing Services (COPS). The IMPD’s response is incorporated in Appendix II of this final report, and the COPS Office response is incorporated in Appendix III. The following provides the OIG analysis of the COPS Office response and summary of actions necessary to close the report.

Summary of Actions Necessary to Close the Report

1. **Resolved.** COPS concurred with our recommendation and stated that the IMPD should have scheduled a technical assistance site visit in order to meet the mandatory special condition of the grant. In its response, COPS stated that while the IMPD did not receive a technical assistance site visit, the lack of such a visit did not appear to have a material effect on the IMPD’s implementation of its COPS technology award. Moreover, according to COPS, the IMPD anticipates scheduling the technical assistance site visit on or before July 1, 2012.

   This recommendation can be closed when we receive documentation showing the completion of the technical assistance site visit, which was required by a special condition of the grant.