

# City of Miami

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INDEPENDENT AUDITOR GENERAL



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January 7, 2020

Honorable Members of the City Commission  
City of Miami  
3500 Pan American Drive  
Coconut Grove, FL 33133-5504

Re: Audit of the Miami Police Department's Extra Duty Employment Program  
Report No. 20-03

## Executive Summary

We have completed an audit of the City of Miami (City) Police Department's (MPD's) Extra Duty Employment Program, primarily for the period January 1, 2015 through December 31, 2018.

The audit was performed to analyze extra duty hours worked by MPD officers and to determine whether the internal controls governing the administration of the MPD's Extra Duty Employment Program are efficient and effective, designed to protect the public's interest and safety, and provide compliance with Departmental Orders that govern the program. We also determined the implementation status of recommendations made in our prior audit of the Extra Duty Employment Program.

Overall, we have concluded that internal controls were inadequate to ensure that extra duty employment hours scheduled and worked were accurately recorded by both the City and the third-party employer; and that MPD officers were not paid by both the City and outside employer for the same hours for on-duty and extra duty assignments. Also, communication between the MPD's Special Events Unit and other City offices and Departments needs to be established to ensure that the Extra Duty Employment Program is effective.

Based on the results of our audit, we noted the following:

1. The extra duty and on-duty scheduling systems do not communicate with each other resulting in overlapping scheduling conflicts that remained uncorrected.
2. All extra duty compensation is not paid through City payroll resulting in possible payments for overlapping extra duty and on-duty time.
3. Excessive extra duty hours could result in conflicts of interest and diminished on-duty performance.
4. Administrative surcharges are owed to the City.
5. The Computers and Communications Users Committee does not convene as required by City policy.
6. Systems Development Lifecycle Procedures were not communicated or followed.

In addition, we followed up on the implementation status of corrective actions resulting from prior audit report No. 16-10 (Audit of Off-Duty Police Employment Activities) and noted that no corrective actions were implemented for key recommendations (see page 20). We have made similar recommendations to improve the internal control environment and operational efficiency over the Extra Duty Employment Program in this report. Also, as indicated in a recent report issued by the Civilian Investigative Panel (Miami Police Extra Duty Assignment Review) they concluded that the City should either keep this function within its own structure with improvements or use a third-party administrator to manage the extra duty program. Outsourcing the function would help to eliminate issues regarding scheduling and excessive hours worked, officer payments and required federal tax documents, and client billings and surcharges due the City. Third party administrators manage these programs in many large cities including Coral Gables and West Palm Beach.

Details of our findings and recommendations are included on pages 4 through 19 of the report.

We wish to express our appreciation for the cooperation and courtesies extended to us by all City personnel while conducting this audit.

Sincerely,



Theodore P. Guba, CPA, CIA, CFE  
Independent Auditor General  
Office of the Independent Auditor General

C: The Honorable Mayor Francis Suarez  
Emilio T. Gonzalez, City Manager  
Victoria Mendez, City Attorney  
Todd Hannon, City Clerk  
Joseph Napoli, Deputy City Manager  
Jose Regalado, Assistant to the City Manager  
Jorge Colina, Chief of Police, Miami Police Department  
Ronald L. Papier, Deputy Chief, Office of the Chief  
Eldys Diaz, Senior Executive Assistant to the Police Chief, Office of the Chief  
George Wysong, Senior Assistant City Attorney, Office of the City Attorney  
Sandra Bridgeman, Assistant City Manager/Chief Financial Officer  
Fernando Casamayor, Assistant City Manager/Chief of Operations  
Nzeribe Ihekwebaba, Assistant City Manager/Chief of Infrastructure  
Erica Paschal, Director of Finance, Finance Department  
Christopher Rose, Director, Office of Management and Budget  
Michael Sarasti, CIO/Director, Department of Innovation and Technology  
Otto Contreras, Deputy CIO/Assistant Director, Department of Innovation and Technology  
Annie Perez, Director, Procurement Department  
Members of the Audit Advisory Committee  
Audit Documentation File

**AUDIT OF THE MIAMI POLICE DEPARTMENT’S EXTRA DUTY  
EMPLOYMENT PROGRAM**

**JANUARY 1, 2015 THROUGH DECEMBER 31, 2018  
REPORT No. 20-03**

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## **SCOPE, OBJECTIVES, AND METHODOLOGY**

The scope of the audit assessed the policies, procedures and practices concerning the MPD's Special Events Unit (SEU), focusing on extra duty police employment activities. The audit primarily covered the period January 1, 2015 through December 31, 2018 and focused on the following objectives:

- To determine if the policies and procedures governing the administration of the MPD's Extra Duty Employment Program are efficient and effective, designed to protect the public's interest and safety, and provide compliance with Departmental Orders that govern the program;
- To review the MPD's ability to analyze and quantify the impact of extra duty work by MPD officers;
- To examine whether the SEU's scheduling system and practices were adequate for detecting non-compliance with policies and for monitoring and managing MPD officer's extra duty time and workload;
- To recommend improvements in the internal control environment;
- To follow-up on the implementation status of recommendations made in our prior audit of the Extra Duty Employment Program.

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.

The audit methodology included the following:

- Interviewed and inquired of appropriate personnel.
- Reviewed written policies and procedures in order to gain an understanding of the internal controls.
- Observed current practices and processing techniques.
- Tested applicable transactions and records.
- Performed other audit procedures as deemed necessary.
- Drew conclusions based on the results of the testing, made corresponding recommendations and obtained the auditee's responses and corrective action plans.

## **BACKGROUND**

### **City of Miami Police Department**

The City of Miami (City) Police Department (MPD) provides law enforcement, investigative, and support services in order to prevent, detect, and solve crime. In fiscal year 2019, the MPD's approved budget was approximately \$262.9 million, and there were 1,785 employees, including 1,370 sworn officers. Our audit focused on the MPD's Extra Duty Employment Program.

### **Special Events Unit**

The MPD's Special Events Unit (SEU) administers the Extra Duty Employment Program through which MPD officers engage in approved third-party employment, such as providing visual deterrents to crime at bank lobbies, department stores, theatres, parks, and private homes on a permanent and temporary basis. The approximate cost to operate the SEU is \$1.3 million per year, which includes salaries and benefits for 11 employees (eight sworn officers and three civilians), and \$15,000 for an outsourced payroll provider, ADP.

Departmental Order 12, Chapter 1 regulates the SEU and includes the following key directives:

- Chapter 1.7.1: Outside employment shall not constitute a real or perceived conflict of interest with one's City employment. The employee's foremost responsibility is to his/her primary employer, the City of Miami.
- Chapter 1.7.2: Under no circumstances shall outside employment be performed during an employee's regular working hours.
- Chapter 1.6.8: Members are prohibited from working more than sixteen (16) hours during a 24-hour period. The (16) hour maximum will include a combined total of extra duty and on-duty working hours. Total extra duty hours worked during a given work week (Sunday through Saturday) shall not exceed (36) hours. Any exceptions must be approved by the Special Operations Section Commander or his designee.

### **Extra Duty Trak Scheduling System**

The City developed the Extra Duty Trak Scheduling System software program in 2008 for use by SEU personnel to schedule all extra duty jobs and maintain permanent records of all extra duty jobs and special events, including scheduled hours, worked hours, surcharges and compensation for each employee. It should be noted that the program is a stand-alone system that does not communicate with on-duty scheduling software or payroll. Personnel throughout the MPD use the Extra Duty Trak Scheduling System to search for extra duty jobs, retrieve information and requirements of the particular job, and sign up. MPD Commanders use the software to search for SEU-related activities within their service areas.

## Extra Duty Hours and Compensation

The yearly hours worked and estimated compensation earned at extra duty assignments, categorized as Permanent jobs (i.e., supermarkets, banks, restaurants where outside employers generally pay MPD officers directly), Temporary jobs (i.e., parties, traffic assignments), Special Events (i.e., sport events, concerts, street festivals) and Special Taxing Districts (designated areas of the City where property owners pay special property assessments to receive extra duty police services), are shown in Table 1 below:

<b>Table 1. Yearly Extra Duty Hours Worked and Estimated Compensation Earned</b>						
		<b>Permanent</b>	<b>Temporary</b>	<b>Special Events</b>	<b>Special Taxing District</b>	<b>Yearly Totals</b>
<b>2015</b>	Hours Worked	297,340	41,384	74,329	36,409*	449,462
	Compensation	\$9,883,928	\$1,331,776	\$2,471,972	\$1,222,700	\$14,910,376
<b>2016</b>	Hours Worked	326,903	42,301	117,680	6,527	493,411
	Compensation	\$11,415,127	\$1,446,442	\$4,147,885	\$232,854	\$17,242,308
<b>2017</b>	Hours Worked	305,246	41,621	142,274	5,591	494,732
	Compensation	\$11,968,804	\$1,601,180	\$5,612,903	\$218,976	\$19,401,863
<b>2018</b>	Hours Worked	271,865	42,711	126,333	8,425	449,334
	Compensation	\$11,453,271	\$1,737,999	\$5,338,733	\$353,714	\$18,883,717
<b>Total</b>	Hours Worked	1,201,354	168,017	460,616	56,952	1,886,939
	Compensation	\$44,721,130	\$6,117,397	\$17,571,493	\$2,028,244	\$70,438,264

\* In 2015, several special events were miscoded to the Special Taxing District.

The average yearly hours worked, and compensation earned were 471,000 hours and \$17.6 million, respectively, for the four-year audit period. A total of 9,225 extra duty jobs were worked.

## Surcharges

An administrative fee is assessed on the extra duty police services provided to secondary employers, as described in City Code Section 42-8(b) – *Special off-duty police services; fees*:

- “As a fee payable to the city to offset the administering of the herein off-duty police services program, the chief of police shall cause to be collected and shall establish procedures for the collection by the city of a fee of \$4.00 per hour, per officer, per location. Said fee will require a three-hour \$12.00 minimum per officer, per location. Effective June 1, 2017, the administrative fee shall be increased to \$4.50 per hour, per officer, per location. Said fee will require a three-hour \$13.50 minimum per officer, per location.”

In addition, assignments in residential and areas of the City designated as “Special Taxing Districts” are subject to administrative fees of \$10 per officer, per day. For each extra duty assignment, \$5.00 of the administrative fee should be placed in the City self-insurance and insurance trust fund, with the remainder of the administrative fee placed in the general fund. From January 1, 2015 through December 2018, the City received extra duty administrative fees totaling \$6,394,538; or, approximately \$1.6 million per year.

## **AUDIT FINDINGS AND RECOMMENDATIONS**

**Conclusion:** Overall, we have concluded that internal controls were inadequate to ensure that extra duty employment hours scheduled and worked were accurately recorded by both the City and the third-party employer; and that MPD officers are not paid by both the City and outside employer for the same hours for regular and extra duty assignments. Also, communication between the MPD's Special Events Unit and other City offices and Departments needs to be established to ensure that the Extra Duty Employment Program is effective.

Based on the results of our audit, we noted the following:

1. The extra duty and on-duty scheduling systems do not communicate with each other resulting in overlapping scheduling conflicts that remained uncorrected.
2. All extra duty compensation is not paid through City payroll resulting in possible payments for overlapping extra duty and on-duty time.
3. Excessive extra duty hours could result in conflicts of interest and diminished on-duty performance.
4. Administrative surcharges are owed to the City.
5. The Computers and Communications Users Committee does not convene as required by City policy.
6. Systems Development Lifecycle Procedures were not communicated or followed.

In addition, we followed up on the implementation status of corrective actions resulting from prior audit report No. 16-10 (Audit of Off-Duty Police Employment Activities) and noted that no corrective actions were implemented for key recommendations (see page 20). We have made similar recommendations to improve the internal control environment and operational efficiency over the Extra Duty Employment Program in this report. Also, as indicated in a recent report issued by the Civilian Investigative Panel (Miami Police Extra Duty Assignment Review) they concluded that the City should either keep this function within its own structure with improvements or use a third-party administrator to manage the extra duty program. Outsourcing the function would help to eliminate issues regarding scheduling and excessive hours worked, officer payments and required federal tax documents, and client billings and surcharges due the City. Third party administrators manage these programs in many large cities including Coral Gables and West Palm Beach.

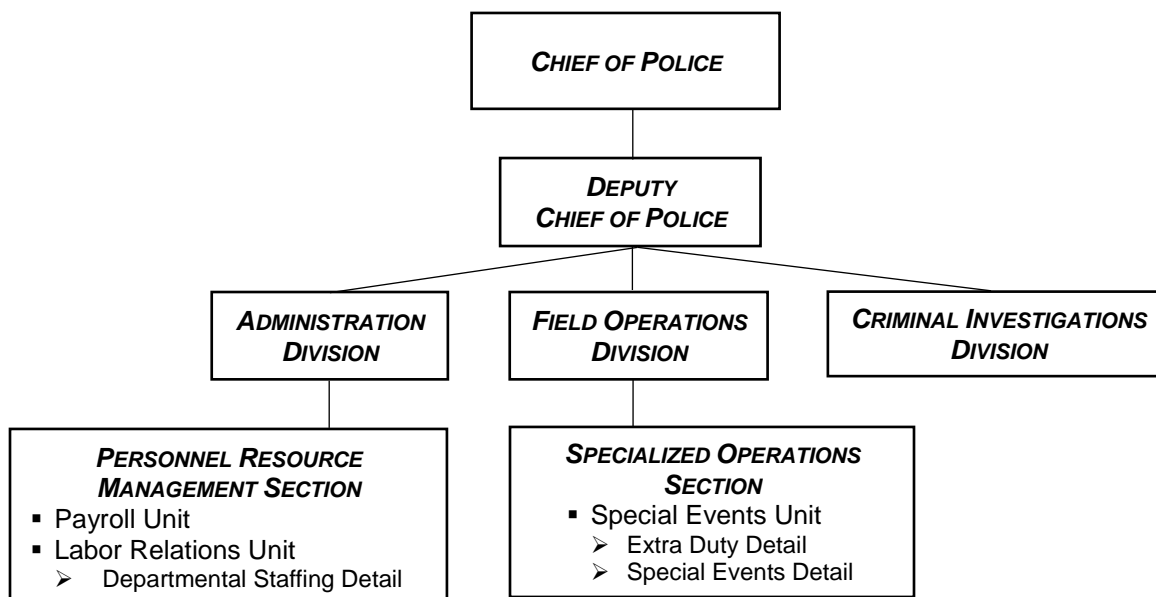
Details of our findings and recommendations are included on pages 4 through 19 of the report.

### **FINDING 1: THE EXTRA DUTY AND ON-DUTY SCHEDULING SYSTEMS DO NOT COMMUNICATE WITH EACH OTHER RESULTING IN OVERLAPPING SCHEDULING CONFLICTS THAT REMAINED UNCORRECTED**

MPD Departmental Order 12, Chapter 1.7.2 states, "under no circumstances shall outside employment be performed during an employee's regular working hours." Accordingly, the technological system the MPD relies on for job scheduling should have the ability to enforce this order.

The MPD is organized into three Divisions: the Administration Division, Field Operations Division, and Criminal Investigations Division. On-duty scheduling including overtime is performed by the

Administration Division, while extra duty job scheduling is administered by the Field Operations Division. (See below)



The Administration Division includes the Personnel Resource Management Section, which contains the MPD’s Payroll Unit and Labor Relations Unit. The Payroll Unit oversees and coordinates bi-weekly payroll of on-duty and overtime work for payment via the City’s Oracle system. The Labor Relations Unit contains the Departmental Staffing Detail Office which schedules on-duty and overtime work using the TeleStaff software, a product of third-party software vendor Kronos. TeleStaff was fully implemented during 2018 as a replacement of the City-developed Police Staffer scheduling software. TeleStaff has an interface with Kronos Workforce Central, which contains pay rules; and Workforce Central has an interface with the City’s Oracle Payroll Module in order to generate bi-weekly payroll payments.

The Field Operations Division includes the Specialized Operations Section, which includes the Special Events Unit (SEU). The SEU administers the scheduling and assignments of extra duty employment (i.e., for permanent and temporary extra duty jobs, special events and special taxing districts) using the Extra Duty Trak Scheduling System, developed by City personnel.

Observations

1. The Extra Duty Trak Scheduling System used by the SEU does not communicate with TeleStaff, the on-duty (including overtime) scheduling system used by the Staffing Detail Office. As a result, there is a lack of systematic controls to prevent scheduling extra duty employment during an employee’s on-duty (regular and overtime) working hours.

To verify the MPD’s compliance with Departmental Order 12, Chapter 1.7.2, (under no circumstances shall outside employment be performed during an employee’s regular working hours), we reviewed the on-duty and extra duty hours worked by ten officers who worked the most extra duty hours in 2015, ranging from 2,018 to 3,714 hours. (See Table 2, Page 6)



It should be noted that the extra duty work in the following analysis was primarily for Permanent jobs where the extra duty employer pays the officer directly for hours worked (officers' compensation for Permanent jobs totaled approximately \$44.7 million during our scope period). **We found that there are no City records/source documents to support the actual hours approved by third-party employers and recorded in the Extra Duty Trak Scheduling System for permanent jobs. Also, the City had no support for the amounts of compensation actually paid to officers by these third-party employers, which may have differed from our estimated amount of \$44.7 million.**

For the period January 1, 2015 through March 31, 2015, we noted the following:

- All individuals' schedules showed job overlaps in hours worked, for a total of 183 separate occurrences.
- Overlap hours totaled 657.25 (9.86%) out of 6,664 hours of extra duty employment, or an average of 3.6 hours of overlap for each occurrence.
- Records showed 323.75 hours of overlap when on-duty and extra duty jobs were worked concurrently, and 333.5 hours of overlap when two extra duty jobs were worked concurrently.

Table 2. On-Duty and Extra Duty Job Overlaps, by Hours and Occurrences							
Officer	Patrol Area	Total Extra Duty Hours	Overlap Hours				Occurrences
			On-Duty/ Extra Duty	Extra Duty/ Extra Duty	Total Overlap	% of Total Extra Duty Hours	
A	Coconut Grove	522	28	89	117	22.41%	29
B	Coral Way	890.5	61.5	59.5	121	13.59%	25
C	Wynwood	678	76	7	83	12.24%	27
D	Coconut Grove	897	90.5	14.5	105	11.71%	20
E	Downtown	807.5	17.5	56	73.5	9.10%	17
F	Upper East Side	447	0	40	40	8.95%	20
G	Coconut Grove	576	12.5	33	45.5	7.90%	10
H	Model City	675	20.5	19	39.5	5.85%	16
I	Coconut Grove	544.5	10	15.5	25.5	4.68%	11
J	Upper East Side	626.5	7.25	0	7.25	1.16%	8
<b>Totals:</b>		<b>6,664.00</b>	<b>323.75</b>	<b>333.5</b>	<b>657.25</b>	<b>9.86%</b>	<b>183</b>

2. We noted that the MPD is structured such that there is a lack of communication between the Staffing Detail Office (schedules on-duty work) and the SEU (schedules extra duty work), as it relates to personnel scheduling. The Staffing Detail Office began a project in 2015 to replace Police Staffer (a stand-alone scheduling system separate from payroll) with Kronos TeleStaff (an integrated scheduling system integrated with payroll). However, there were no plans to include extra duty job scheduling with TeleStaff, since the scheduling functions for on-duty and extra duty work reside in different Divisions of the MPD (Administration and Field Operations, respectively) and did not communicate.

As a result of the lack of communication between the on-duty and extra duty scheduling systems and the separation of scheduling duties between the Staffing Detail Office and SEU of the MPD, **there are no systematic controls in place to ensure compliance with**

**Departmental Order 12 Chapter 1.7.2, which prohibits MPD officers from performing outside employment during regular working hours.** Additionally, by having the on-duty and extra duty scheduling functions in separate divisions, there is a duplication of scheduling-related knowledge and effort.

Kronos personnel familiar with the City's TeleStaff and Workforce Central Systems stated that TeleStaff can be programmed to automate scheduling of extra duty assignments based on those officers who are signed up, certified, qualified and available to perform the job. Kronos personnel also stated that system enhancements can prevent scheduling conflicts and process compensation payments to officers for extra duty work through the City's payroll system via the interfaces between TeleStaff and Workforce Central and the City's Oracle payroll module. They estimated that the total cost to complete these upgrades is \$18,000.

### **RECOMMENDATION 1.1: MIAMI POLICE DEPARTMENT/CITY MANAGER'S OFFICE**

We recommend that the MPD upgrade the existing TeleStaff system used in the Staffing Detail Office to handle scheduling for extra duty jobs, including job details, requirements, start/end dates and times, sign-up, assignment, etc. Our research of the TeleStaff system indicates that public safety departments throughout the United States use the system for scheduling both on-duty and extra duty work, including the City and County of Denver, Colorado (population approximately 620,000; police department staffing level of approximately 1,700 including 1,400 sworn officers).

Alternatively, the City should consider outsourcing the administration of the Extra Duty Employment Program with a third-party administrator to correct the above deficiencies.

- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. The system used by the third-party administrator will be required to integrate with the TeleStaff system.
- **Implementation Date:** The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

### **RECOMMENDATION 1.2: MIAMI POLICE DEPARTMENT/CITY MANAGER'S OFFICE**

We recommend that the MPD move the extra duty job scheduling functions currently performed within the SEU to the Personnel Resource Management Section of the Administration Division. The scheduling functions performed by the SEU are administrative in nature; operational efficiency would be improved if the MPD centralized on-duty and extra duty job scheduling functions. Other than initial approval of an extra duty job by the relevant Neighborhood Enhancement Team (NET) Commander, there does not appear to be any direct, ongoing involvement from the Field Operations Division in this area.

Alternatively, the City should consider outsourcing the administration of the Extra Duty Employment Program with a third-party administrator to correct the above deficiencies.

- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs.
- **Implementation Date:** The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

**FINDING 2: ALL EXTRA DUTY COMPENSATION IS NOT PAID THROUGH CITY PAYROLL RESULTING IN POSSIBLE PAYMENTS FOR OVERLAPPING EXTRA DUTY AND ON-DUTY TIME**

Best practices state that police department employees should not accept payment from an extra duty employer for the same time that is paid by the City.

**Observations**

1. We reviewed the MPD's Departmental Order 12, Chapter 1 "Special Events Unit", and the SEU's Standard Operating Procedures manual and found that neither regulatory document prohibits MPD personnel from accepting payments from outside employers for time that is also paid by the City.
2. The MPD does not use the City's Oracle system to compensate MPD officers for all extra duty employment types. In current practice, individuals working extra duty are generally paid depending on the type of employment, as follows:
  - Permanent Jobs – third-party employers pay by cash/check directly to MPD officers for hours worked; the City sends an invoice to each outside employer for surcharges on a monthly basis.
  - Temporary Jobs – third-party employers pay the City in advance for surcharges and compensation due. Payment for actual hours worked by MPD officers is processed through ADP Payroll.
  - Special Events – the SEU uses ADP to pay MPD officers based on actual documented hours worked; the third-party employers pay the City in advance for surcharges and compensation. Alternatively, third-party employers may pay MPD officers directly upon receiving a final invoice for hours worked and surcharges due.
  - Special Taxing Districts – the City pays officers for hours worked through City Payroll submits documented hours to Miami-Dade County for reimbursement for hours worked and surcharges due.

In order to determine the amount of compensation earned by MPD officers for extra duty employment, we obtained the work schedules from the Extra Duty Trak Scheduling System, showing job type, location, date, start/end times, and personnel name and rank. Using this information, we multiplied the hours by the compensation rates in effect at the time; the estimates of compensation earned are shown below in Table 3.

As shown in Table 3, during calendar years 2015 through 2018, the majority of extra duty compensation paid to MPD officers resulted from permanent jobs (\$44.7 million, or, 63% of total), where cash/check payments are made directly from an outside employer to MPD officers.

<b>Table 3. Estimated Yearly Compensation Earned by Job Type</b>									
<b>Year</b>	<b>Permanent</b>	<b>% of Total</b>	<b>Temporary</b>	<b>% of Total</b>	<b>Special Events</b>	<b>% of Total</b>	<b>Special Taxing District</b>	<b>% of Total</b>	<b>Yearly Totals</b>
<b>2015</b>	\$9,883,928	66%	\$1,331,776	9%	\$2,471,972	17%	\$1,222,700	8%	\$14,910,376
<b>2016</b>	\$11,415,127	66%	\$1,446,442	8%	\$4,147,885	24%	\$232,854	1%	\$17,242,308
<b>2017</b>	\$11,968,804	62%	\$1,601,180	8%	\$5,612,903	29%	\$218,976	1%	\$19,401,863
<b>2018</b>	\$11,453,271	61%	\$1,737,999	9%	\$5,338,733	28%	\$353,714	2%	\$18,883,717
<b>Total</b>	<b>\$44,721,130</b>	<b>63%</b>	<b>\$6,117,397</b>	<b>9%</b>	<b>\$17,571,493</b>	<b>25%</b>	<b>\$2,028,244</b>	<b>3%</b>	<b>\$70,438,264</b>

- Actual hours worked, which are input into the Extra Duty Trak Scheduling System by job coordinators by the fifth day of the month following job performance, are not required to be supported by timecards or any other documentation. **For permanent extra duty jobs, we attempted to confirm the accuracy of extra duty work records obtained from SEU personnel via the Extra Duty Trak Scheduling System by reconciling the extra duty work records to timesheets and compensation payment records. However, no supporting documentation was available to support actual hours worked, approved and paid by the outside employer.**

As a result of these deficiencies, there is a risk that MPD officers receive payments from extra duty employers for the same hours that are paid by the City for on-duty work. Also, MPD officers may not receive accurate tax-related documents as required by the Internal Revenue Service, such as Miscellaneous Income Tax Form 1099, for compensation received from multiple outside employers.

**RECOMMENDATION 2.1: MIAMI POLICE DEPARTMENT/CITY MANAGER’S OFFICE**

We recommend that all payments for extra duty work be made to MPD officers through the City’s Oracle system. This can be accomplished by upgrading the City’s TeleStaff system to include this enhancement. For example, supporting schedules of actual hours worked should be input into TeleStaff, after being reviewed, approved, and authorized by appropriate personnel. Rules for extra duty scheduling and compensation rates can be input into Workforce Central; and this

information can be input into the Oracle payroll module via an interface to enable extra duty compensation payments to officers.

It should be noted that MPD officers are already paid through the City's Oracle payroll system for extra duty work performed in Special Taxing Districts.

Kronos personnel familiar with the City's implementation of TeleStaff, Workforce Central and Oracle determined that the recommendation above can be implemented as a part of the upgrades included in Recommendation 1.1 of this report.

Alternatively, the City should consider outsourcing the administration of the Extra Duty Employment Program with a third-party administrator to correct the above deficiencies.

- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. The third-party administrator will facilitate all payments to officers for extra duty work.
- **Implementation Date:** The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

## **RECOMMENDATION 2.2: MIAMI POLICE DEPARTMENT**

We recommend that the MPD implement policies to be part of the Departmental Orders and the SEU Standard Operating Procedures (SOP) manual that:

- Prohibit MPD officers from accepting payment from an extra duty employer for the same time that is paid by the City or by another extra duty employer.
- Prohibit accepting any payments directly from outside employers.
- Require actual extra duty work start/end times be accurately documented, recorded, approved and retained by the City as source documents to support all extra duty payments.
- Prohibit extra duty jobs to be performed during an employee's regular working hours.
- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. The third-party administrator's system will be integrated with TeleStaff and will not allow officers to work concurrent assignments. Officers will be paid for extra duty police assignments through the third-party administrator exclusively and will not receive direct payments from outside employers. All policies related to extra duty work will be updated to reflect the processes and procedures associated with the third-party administration. The updated policy will address the listed concerns.

- **Implementation Date:** Policies prohibiting MPD officers from accepting payment from an extra duty employer for the same time the officer is paid by the City or another extra duty employer and prohibiting extra duty jobs to be performed during an employee's regular working hours will be drafted and implemented by 3/1/2020. The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

**FINDING 3: EXCESSIVE EXTRA DUTY HOURS COULD RESULT IN CONFLICTS OF INTEREST AND DIMINISHED ON-DUTY PERFORMANCE**

MPD Departmental Order 12, Chapter 1.6.8 states, “Members are prohibited from working more than sixteen (16) hours during a 24-hour period. The (16) hour maximum will include a combined total of extra duty and on duty working hours. Total extra duty hours worked during a given work week (Sunday through Saturday) shall not exceed (36) hours. Any exceptions must be approved by the Special Operations Section Commander or his designee.”

Additionally, MPD Departmental Order 12, Chapter 1.7.1 states, “outside employment shall not constitute a real or perceived conflict of interest with one’s City employment. The employee’s foremost responsibility is to his/her primary employer, the City of Miami.” There is a risk that a conflict of interest may arise if MPD personnel work excessive hours for an outside employer, creating perceived or actual loyalty to that employer ahead of loyalty to the MPD. Additionally, working excessive extra duty hours may lead to diminished on-duty performance due to fatigue.

**Observations:**

1. Department Order 12 and the SEU’s Standard Operating Procedures do not specify a maximum number of extra duty hours that MPD officers may work in a year, nor the number of consecutive days that personnel may work a combination of on-duty and extra duty jobs.
2. We obtained the extra duty jobs worked for the period January 1, 2015 through March 31, 2015 from the Extra Duty Trak Scheduling System and found instances where MPD officers worked more than the maximum daily and weekly duty hours, as shown below in Table 4 (in 185 instances they worked more than 16 hours per day; in 89 instances they worked more than 36 hours extra duty per week). We did not find any evidence that the Special Operations Section Commander or designee approved the excess hours worked.

**Table 4. Instances Officers Worked More Than The Maximum Daily and Weekly Hours**

Officer	Payroll Area	Total Extra Duty Hours	Instances worked more than 16 hours per day	Instances worked more than 36 hours per week (Extra Duty)
A	Coconut Grove	522	12	5
B	Coral Way	890.5	30	13
C	Wynwood	678	12	10
D	Coconut Grove	897	23	13
E	Downtown	807.5	14	9
F	Upper East Side	447	21	0
G	Coconut Grove	576	20	9
H	Model City	675	16	10
I	Coconut Grove	544.5	15	9
J	Upper East Side	626.5	22	11
<b>Totals:</b>		<b>6,664</b>	<b>185</b>	<b>89</b>

- To determine whether yearly extra duty hours worked were reasonable, we obtained the extra duty jobs worked for calendar years 2015 through 2018. Our analysis showed that over this time period, there were 49 occurrences when personnel worked more than 2,000 extra duty hours, 90 occurrences between 1,500 and 1,999 hours, and 334 occurrences between 1,000 and 1,499 hours, as shown in Table 5 below.

It should be noted that multiplying the maximum weekly extra duty hours stipulated in Departmental Orders over the course of a year (36 weekly maximum extra duty hours x 52 weeks) yields a maximum of 1,872 extra duty hours. During calendar years 2015 through 2018, there were 15, 25, 15 and 7 officers, respectively, who worked more than 1,872 extra duty hours per year. Consequently, it is apparent that many officers exceeded the maximum allowable hours that should be worked during the review period.

**Table 5. Extra Duty Hours Worked by Number of Officers, Per Year**

Extra Duty Hours Worked	2015	2016	2017	2018	Total
2,000 or more	12	21	12	4	49
1,500 to 1,999	21	24	27	18	90
1,000 to 1,499	82	89	86	77	334
999 or fewer	995	1,179	1,364	1,309	4,847
<b>Total Officers:</b>	<b>1,110</b>	<b>1,313</b>	<b>1,489</b>	<b>1,408</b>	<b>5,320</b>

- A conflict of interest may also arise from the use of coordinators to assign extra duty jobs to MPD officers. Although best practices state that extra duty job coordinators may coordinate no more than two jobs concurrently, and that the work of job coordinators should be properly supervised; we found that the work of coordinators is not supervised or reviewed to ensure that work is allocated to officers who are certified, qualified and available for work and are provided an equal opportunity for extra duty employment. We analyzed the extra duty jobs worked for the first half of 2019 and found that 12 coordinators coordinated up to ten concurrent extra duty jobs, and a total of 53 jobs (see Table 6; it should be noted that these jobs were primarily “permanent” where the third-party employer pays the officers directly). As

a result, there is a risk that MPD officers who have applied for jobs and may not be assigned a job due to conflicts of interest or favoritism among the job coordinator, outside employer and other MPD personnel.

<b>Table 6. MPD Personnel Coordinating More Than Two Extra Duty Jobs</b>		
<b>Number of Coordinators</b>	<b>Number of Jobs each Coordinator Coordinated</b>	<b>Total Number of Jobs</b>
1	10	10
1	7	7
2	5	10
2	4	8
6	3	18
<b>Totals: 12</b>	<b>29</b>	<b>53</b>

**RECOMMENDATION 3.1: MIAMI POLICE DEPARTMENT**

We recommend that the MPD implement the following policies to be part of the Departmental Orders and SEU Standard Operating Procedures:

1. Establish a maximum annual number of extra duty hours that MPD officers may work. We recommend 1,000 hours to minimize the risk of creating an inappropriate loyalty, conflict of interest, or a risk of officer fatigue. Also, officers working permanent jobs should be periodically rotated.
  2. Specify the circumstances under which MPD officers may exceed the weekly maximum extra duty hours (i.e., emergencies, natural disasters, etc.)
  3. Limit the number of extra duty jobs that a coordinator may coordinate and assign an individual to oversee and supervise all coordinators. Alternatively, the MPD should consider eliminating the role of extra duty job coordinator and assign these tasks to SEU personnel or outsource this role.
- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. This will eliminate the internal need for job coordinators. Department policies will be updated to establish a maximum annual number of extra duty hours an officer may work. The updated policy will address exceptions under which officers may exceed the established maximum hour limits.
  - **Implementation Date:** Policies establishing a limit to the maximum number of extra duty hours an officer may work per year and specifying the circumstances under which MPD officers may exceed the weekly maximum extra duty hours will be drafted and implemented by 3/1/2020. The solicitation and implementation timeline for the third-party management services is as follows:
    - **Solicitation Release:** 1/03/20
    - **Proposals Due:** 1/29/20
    - **Evaluation Committee Meeting:** 2/26/20
    - **Negotiation Meeting:** 3/24/20
    - **Award Recommendation Approved by City Manager:** 4/07/20



- **Commission Date:** 5/28/20 or 6/11/20
- **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

#### **FINDING 4: ADMINISTRATIVE SURCHARGES ARE OWED TO THE CITY**

City Code Section 42-8(b) – *Special off-duty police services; fees* states:

“As a fee payable to the city to offset the administering of the herein off-duty police services program, the chief of police shall cause to be collected and shall establish procedures for the collection by the city of a fee of \$4.00 per hour, per officer, per location. Said fee will require a three-hour \$12.00 minimum per officer, per location. Effective June 1, 2017, the administrative fee shall be increased to \$4.50 per hour, per officer, per location. Said fee will require a three-hour \$13.50 minimum per officer, per location.”

In addition, assignments in residential and areas of the City designated as “Special Taxing Districts” are subject to administrative fees of \$10 per officer, per day. For each extra duty assignment, \$5.00 of the administrative fee should be placed in the City self-insurance and insurance trust fund, with the remainder of the administrative fee placed in the general fund. From January 1, 2015 through December 2018, the City received extra duty administrative fees totaling \$6,394,538; or, approximately \$1.6 million per year.

#### **Observations:**

1. To determine whether the City has received the amounts due for administrative fees and surcharges earned from providing extra duty services, we reviewed the accounts receivable aging report. We found that \$103,648 is 90 days or more past due, of which \$81,710 is more than 120 days past due. Further, we found that the City’s accounts receivable section of the Finance Department does not have written procedures to write off past due amounts as uncollectible.
2. We reviewed the procedures for Administrative Fee billings for permanent extra duty jobs and found that the SEU submits the surcharge report to the MPD’s Police Budget Unit (PBU). The PBU manually prepares an invoice based on the surcharge report and sends it to the customer via email. The City’s Finance Department may also mail the customer a printed copy of the invoice depending on the customer’s preference.

We found that the PBU employee who bills the administrative fees does not have access to Extra Duty Trak Scheduling System and does not receive a list of all permanent extra duty hours and jobs. Also, reconciliations are not performed to ensure that the surcharge shown on all monthly surcharge reports are billed. As a result, there is a risk that all administrative fees may not be billed.

3. Although City Code Section 42-8(b) states that \$5 of each administrative fee will be placed in a self-insurance trust fund, Departmental Orders and SOP do not define how to calculate or determine the amount of an “administrative fee unit” from which to set aside \$5. As a result, the City may be funding its self-insurance trust fund incorrectly.

#### **RECOMMENDATION 4.1: MIAMI POLICE DEPARTMENT**

We recommend that the MPD evaluate the collectability of the accounts that are over 90 days past due and consider writing off amounts deemed to be uncollectible. Also, we recommend that MPD work with the City's Finance Department to create and implement an effective collection policy for extra duty customer accounts.

- **Auditee Response:** MPD is currently evaluating the collectability of accounts that are over 90 days past due and will work with the Finance Department to develop a comprehensive policy for writing off uncollectable accounts. The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. The third-party administrator will require all fees to be paid up front by individuals soliciting extra duty services, eliminating the need for subsequent collection.
- **Implementation Date:** The feasibility study evaluating the collectability of accounts over 90 days past due will be completed by 1/15/2020. The policy for writing off uncollectable accounts will be drafted and implemented by 3/1/2020. The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

#### **RECOMMENDATION 4.2: MIAMI POLICE DEPARTMENT/CITY MANAGER'S OFFICE**

We recommend that the SEU provide the Police Budget Unit (PBU) with a detailed report of all administrative fees that should be billed to customers (by job by month). PBU personnel should compare this report to actual billings and prepare invoices for customers for any unbilled administrative fees.

We recommend that PBU personnel be provided with read-only access to the Extra Duty Trak Scheduling System to enable them to run relevant reports needed for billing administrative fees and not rely on monthly surcharge reports provided by the SEU. After the implementation of upgrades to TeleStaff, we recommend that the administrative fees, along with MPD officers extra duty compensation, be billed to customers in advance, instead of in arrears.

Alternatively, the City should consider outsourcing the administration of the Extra Duty Employment Program with a third-party administrator to correct the above deficiencies.

- **Auditee Response:** The Miami Police Department will procure the services of a third-party administrator to handle scheduling, collection and payment for extra duty jobs. The third-party administrator will provide comprehensive reports of all administrative fees billed to customers and collect fees as appropriate.

- **Implementation Date:** The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

### **RECOMMENDATION 4.3: MIAMI POLICE DEPARTMENT**

Departmental Orders and SOP should define the calculation of an “administrative fee unit” to properly determine amounts to be placed in the self-insurance trust fund.

- **Auditee Response:** The Miami Police Department will draft and implement a policy defining the calculation of an “administrative fee unit.”
- **Implementation Date:** Policies defining the calculation of an “administrative fee unit” will be drafted and implemented by March 1, 2020.

### **FINDING 5: THE COMPUTERS AND COMMUNICATIONS USERS COMMITTEE DOES NOT CONVENE AS REQUIRED BY CITY POLICY**

The City has established Administrative Policy Manual (APM) #1-80 “Computers and Communications Users Committee” (Committee). According to the APM, the Committee acts in an advisory capacity to the City Manager and has the following responsibilities:

- Review and recommend long-range and short-range computer and communication plans and determine project priorities.
- Review and recommend specific proposals for acquisition of major items of computer and communication equipment.
- Review project progress and control costs.
- Recommend the cancellation or completion of projects. This advice should be based on payback; lack of alternative methods; anticipated impact on the organizations, city or personnel; and, conformity to the City long range plans.
- Resolve territorial and organizational conflicts arising from the impact of new systems.

The APM provides that the City Manager appoints members to the Committee: the Assistant City Manager for Finance should be the Committee chair and the Director of the Department of Innovation and Technology Department (DoIT) should be the Secretary; and other members should be users of computers and communications. Finally, Committee meetings should be held monthly and status reports and proposals for new projects should be distributed to Committee members in advance.

During audit fieldwork, we were informed that there were no records of Committee meetings or individuals who had been appointed to serve on the Committee. Additionally, we noted that the APM has not been updated since June 30, 1980.

As a result of the Committee not convening and performing its required duties, the Extra Duty Trak Scheduling System does not serve the needs of its end users or sufficiently protect the public interest, as discussed elsewhere in this report and in our prior audit Report No. 16-10 (Audit of Off-Duty Police Employment Activities).

### **RECOMMENDATION 5.1: CITY MANAGER’S OFFICE**

We recommend that the City Manager review and update Administrative Policy Manual #1-80 “Computers and Communications Users Committee” (Committee) in conjunction with relevant stakeholders from the Department of Innovation and Technology and the Miami Police Department. The committee should be reestablished and monitored to ensure that it meets and performs its responsibilities and duties as required.

- **Auditee Response**: As noted, the “Computers Communications and Communications Users Committee” was established by APM #1-80 on June 30, 1980, almost forty years ago. The administration agrees that this APM must be reviewed. In 2019, The Department of Innovation and Technology (DoIT) implemented new practices for Information Technology (IT) governance, most notably partnering with the Office of Management and Budget, attending all departmental budget allocation meetings in April-May 2019, and collaborating with departments to establish a coordinated, standardized approach to IT project requests. Going into the FY20-21 Budget cycle, DoIT has created new project intake processes that will inform IT Capital requests. The project intake process requires clearly defined problem statement, scores projects for prioritization, and requires departments to align projects to the City’s strategic plan. This corresponds to the intent of APM #1-80. DoIT will make sure to update the APM and explore the reestablishment of a committee for IT governance (as outlined in recommendation 6.1).
- **Implementation Dates**: DoIT will propose a draft of the new policy by February 2020.

### **FINDING 6: SYSTEMS DEVELOPMENT LIFECYCLE PROCEDURES WERE NOT COMMUNICATED OR FOLLOWED**

A Systems Development Life Cycle (SDLC) should be followed when developing and implementing a new system such as the replacement for Extra Duty Trak Scheduling System used by the SEU. The SDLC ensures that technology solutions are aligned with business needs and the City’s broader strategic goals.

A basic SDLC model includes the following required phases:

1. **Project Initiation** – the SEU should submit a request to those charged with information technology governance for review and approval.
2. **Functional Requirement Analysis** – a business analyst (BA) should analyze the current system and define the project scope; the SEU, BA and technology department should review the scope, objectives, risk and priority of the project.
3. **Technical Direction** – the technology department should review the functional requirements and determine the needed interaction with existing systems and investigate if a vendor software package is available.

4. Design – the stakeholders should document data and process flows; then the technology department should determine hardware, software, and network requirements; determine system performance and security strategy; create development and test environments and test, backup and recovery strategies.
5. Customization – the technology department should allocate resources to the project, create a system overview with the project team and develop milestones and deliverables.
6. Implementation Planning – review system interfaces and system performance requirements, finalize equipment needs, formulate data conversion plan, create test data, formulate training plan, finalize project milestones and deliverables.
7. Pre-production Testing – install software to simulated production environment, test major functionality of the system; train the end-users (i.e., SEU personnel, etc.) and obtain implementation approval from the SEU.
8. System Implementation – install software to the production environment; data conversion, implement live system; obtain client acceptance; review project with stakeholders; close project.

However, we found that SEU personnel worked independently from the MPD's and the city-wide information technology departments to select and implement a system to replace the Extra Duty Trak Scheduling System during 2017. Further, members of the MPD's Staffing Detail Office (the on-duty scheduling office) stated that they were not involved with the project. The SEU requested and obtained from an external software provider the following:

- price quote for 1,400 users
- sole source letter
- service agreement
- the external software provider's training and implementation process documents

In December 2017, we met with members of the MPD's technology department; city-wide information technology department; and the business analyst supervisor from the City Manager's Office to discuss the SEU's Extra Duty Trak Scheduling System replacement project. However, none of the meeting participants were aware of the SEU's project.

Discussions with the City's MPD and city-wide information technology departments indicated that they require an SDLC process to be followed, but neither department had communicated this requirement to the SEU. They explained that project requests are required to be submitted to the Assistant City Manager in charge of the requesting City department and the ACM in charge of the ITD for review and approval before the request is sent to the ITD. As a result, those in charge of technology governance did not maintain ongoing contact with high-dollar volume "businesses" within the City, such as the SEU, to keep apprised of their technology needs on an ongoing basis.

Due to these conditions, the SEU did not consider other stakeholders in their efforts to implement a replacement for the Extra Duty Trak Scheduling System. They also did not consider the underlying infrastructure that would be needed to support the system, or the required interfaces with other systems, such as the on-duty scheduling system and the Oracle financial system.

## **RECOMMENDATION 6.1: INNOVATION AND TECHNOLOGY DEPARTMENT/CITY MANAGER'S OFFICE**

We recommend that the Department of Innovation and Technology identify all users of information technology within the City and develop an effective strategy to communicate relevant information, technology policies and processes to key stakeholders overseeing end users. The City should proactively meet with key stakeholders on a periodic basis to maintain a technology environment that continually suits the needs of end users. A means to implement this recommendation may be to reestablish the Computers and Communications Users Committee (See Finding 5, Page 16).

- **Auditee Response:** As outlined in the response to Recommendation 5.1, DoIT has made significant improvements to project intake process and has collaborated with the Office of Management & Budget to make sure information technology (IT) requests are reviewed holistically and align with the City's Strategic Plan. DoIT business analysts have developed standardized approach and scoring to evaluate IT requests. This has been piloted for a limited number of projects in 2019 and will be widely applied to all major projects by February 2020. The administration, as part of its review of APM 1-80, will also consider the establishment of an IT Governance Committee in order to provide additional perspective and evaluation of requests.
- **Implementation Date:** DoIT will include its recommendations regarding an IT Governance Committee by February 2020 as part of its revision to APM #1-80.

## **RECOMMENDATION 6.2: MIAMI POLICE DEPARTMENT**

We recommend that, in the future, the MPD engage the City's Innovation and Technology Department and follow a formal, documented systems development lifecycle (SDLC) process to design and develop any new system. The new system should incorporate best practices, and the MPD's established internal controls and policies and procedures.

- **Auditee Response:** The Miami Police Department will not be following an internal development process for extra duty job management. It will be outsourcing development and administration to a third-party.
- **Implementation Date:** The solicitation and implementation timeline for the third-party management services is as follows:
  - **Solicitation Release:** 1/03/20
  - **Proposals Due:** 1/29/20
  - **Evaluation Committee Meeting:** 2/26/20
  - **Negotiation Meeting:** 3/24/20
  - **Award Recommendation Approved by City Manager:** 4/07/20
  - **Commission Date:** 5/28/20 or 6/11/20
  - **Full Implementation:** 120 days from Commission approval (9/25/20 or 10/09/20)

## **FOLLOW-UP ON PRIOR FINDINGS AND RECOMMENDATIONS**

We performed a prior audit of the MPD's extra duty employment program, audit report No. 16-10, (Audit of Off-Duty Police Employment Activities), Audit Period: January 1, 2013 – June 30, 2015 (accessible online via the following link: [http://archive.miamigov.com/internal\\_audits/audits/2015\\_2016/16-10\\_Off\\_Duty\\_Police.pdf](http://archive.miamigov.com/internal_audits/audits/2015_2016/16-10_Off_Duty_Police.pdf)), and followed up on the implementation status of corrective actions resulting from the audit report's findings and recommendations.

1. Finding 1 - Maximum Allowable Off-Duty Hours were being Exceeded - we found that there were 2,281 instances which indicated that personnel worked more than the policy maximum of 16 hours within a single shift; and that in some cases, extra duty hours worked during a given week exceeded 36 hours. We also found indications that 11 employees worked over 2,000 extra duty hours during 2014.

As a result of these prior findings, we analyzed extra duty hours in more depth, for the period from January 1, 2015 through December 31, 2018, and noted that these same conditions existed with no improvement noted (See Finding 3, Page 11).

2. Finding 2 - Special Event Office Lacks Policies and Procedures that Place Limitations on the Number of Jobs Officers can Coordinate – we found that nine officers coordinated between three and ten jobs.

This finding remains uncorrected (See Finding 3, Page 11).

3. Finding 5 - Off-Duty Surcharges and Fees Billed to Customers are Significantly Overdue – we noted that customers owed the City \$94,475 in past due surcharge fees and accounts totaling \$55,343 are more than 90 days past due.

This finding remains uncorrected (See Finding 4, Page 14).

4. Finding 7 – Centralize Accounting for Off-Duty Hours and Compensation Payments to Officers as well as for Billings and Collections of Surcharge Fees – we recommended that to improve internal controls, enable proper accounting, ensure that off-duty compensation and surcharge fees are reconcilable, accurate and transparent, the MPD centralize the accounting for off-duty hours worked and compensation payments to officers as well as billing and collections of surcharge fees.

The MPD responded that they would implement the corrective action by September 30, 2017. However, the finding remains uncorrected (See Findings 1 and 2, on Pages 4 and 8).