



City of Phoenix

Mission Statement

To improve the quality of life in Phoenix through efficient delivery of outstanding public services.

Project Team

Aaron Cook
City Auditor

Cristina Preciado
Deputy City Auditor

Ashley Willis
Senior Internal Auditor

Project Number

1240039

This report can be made available in alternate format upon request.

Police Department Body-Worn Camera Follow Up

June 26, 2024

Report Highlights

Prior Audit Recommendations

Improvements are needed to implement four of the six remaining recommendations related to categorizing uncategorized videos, reviewing categorization accuracy, identifying and reporting on key performance indicators, and creating a standardized Evidence.com training program for detectives.

Body-Worn Camera Reviews

Quality Assurance Sergeants lack a standardized process for determining compliance for monthly random body-worn camera reviews.

Uncategorized Body-Worn Video Evidence

The Police Department did not categorize all uploaded body-worn camera videos according to department policy in 2023.

Power Cycling

The Police Department should review power cycling data to determine if officers are using body-worn cameras according to department policy.

City Auditor Department
140 N 3rd Avenue Phoenix, AZ 85003
602-262-6641 (TTY use 7-1-1)

Executive Summary

Purpose

Our purpose was to evaluate the implementation of the Police Department (Police) Body-Worn Camera Systems Controls Audit (1210022) prior high risk audit recommendations. The audit revealed issues with system controls, supervisor reviews, video categorization, and monitoring and reporting on various body-worn camera metrics. Appendix A details the recommendations and their implementation status.

Background

Police Operations Order 4.49 *Body-Worn Video and Evidence.com Technology* addresses the responsibilities and expectations of using body-worn cameras and Evidence.com. Users must wear and leave their body-worn cameras powered on while on duty in patrol or working off-duty, extra-duty, or any other uniformed assignment while subject to radio or on-view activity. The policy prohibits officers from powering on and off body-worn cameras between dock cycles (power cycling), except in specific circumstances with permission from an on-duty supervisor. Users are also responsible for docking their body-worn cameras at the end of their shift and ensuring that each video is uploaded and properly categorized within ten days.

Quality Assurance Sergeants (QA Sergeants) are assigned to each of the seven precincts. They are responsible for randomly reviewing two body-worn camera videos from each squad in their precinct monthly for compliance. This includes ensuring that users are activating and deactivating body-worn cameras according to policy and ensuring videos are categorized accurately. The QA Sergeants must document their findings in the Precinct Monthly Management Report (Precinct MMR).

The prior audit had 18 recommendations. We reviewed the six recommendations that were considered high risk, which related to processes related to reviewing, monitoring, and reporting on body-worn camera usage and system controls that Police implemented to ensure videos were accurately categorized. Additionally, we verified that users had the appropriate access to the system. We tested Precinct MMRs for calendar year 2023 to determine if QA Sergeants reported their findings. We reviewed and analyzed uncategorized body-worn camera videos created between January 1, 2023, and December 4, 2023. Additionally, we analyzed average power cycling data from all seven precincts for February 2023 and the Maryvale/Estrella precinct power cycling data by squad in October 2023 to determine compliance with Police policies.

Results in Brief

Improvements are needed to implement four of the six remaining recommendations.

We followed up on six recommendations. One recommendation is fully implemented, and one is no longer applicable. Improvements are needed to fully implement the remaining four recommendations that are related to: categorizing uncategorized body-worn camera videos, reviewing body-worn camera video categorization accuracy, identifying and reporting on applicable Evidence.com key performance indicators, and creating a standardized Evidence.com training program for detectives.

Quality Assurance Sergeants lack a standardized process for determining compliance in monthly random body-worn camera reviews.

We interviewed QA Sergeants, reviewed Police policy, and examined Precinct MMRs for calendar year 2023 to determine if Police had a standardized and consistent process for determining compliance in monthly random body-worn camera video review results. We noted inconsistencies in what QA Sergeants were looking for in their monthly random body-worn camera video reviews and what they reported in the Precinct MMRs. Police had not established procedures or trained QA Sergeants on what they should look for and report on in their body-worn camera video reviews.

The Police Department did not categorize all uploaded body-worn camera videos according to department policy.

We analyzed Evidence.com uncategorized body-worn camera videos created between January 1, 2023, and December 4, 2023, to determine how many uncategorized videos existed. Between January 1, 2023 and December 4, 2023, Police created 2,150,469 body-worn camera videos. As of December 4, 2023, 17,190 body-worn camera videos created in 2023 remained uncategorized. Police did not have a follow-up process to ensure that identified uncategorized videos were categorized.

The Police Department should review power cycling data to determine if officers are using body-worn cameras according to department policy.

Police did not have a policy or procedure for reviewing or reporting on body-worn camera power cycling data. Additionally, Police had not established an acceptable target for how much time body-worn cameras could be powered off. We interviewed QA Sergeants, reviewed Precinct MMRs, and analyzed body-worn camera power cycling data from all precincts for February 2023 and from the Maryvale/Estrella precinct by squad for October 2023 to determine if body-worn cameras were being used according to department policy. The QA Sergeants stated that they did not review power cycling data. Body-worn cameras were powered on between 62% and 72% of the time while undocked in February 2023. In October 2023, 31 of 40 (77.5%) squads in the Maryvale/Estrella precinct had their body-worn cameras turned on less than 80% of the time that they were undocked. Nine of those squads had their body-worn cameras turned off over 50% of the time that they were undocked.

Department Responses to Recommendations

| | |
|---|-----------------------------------|
| Rec. # 1.1: Establish procedures and train QA Sergeants on what they must look for and report on during their monthly random BWC video reviews. | |
| Response: Establish guidelines for QAS monthly BWC reviews and train QA Sergeants on the standard. QA Manual will be updated to reflect changes. | Target Date: 09/01/2024 |
| Rec. # 1.2: Create and document a process that includes timelines for follow-up (at least monthly) and roles and responsibilities for personnel responsible for ensuring that all BWC videos are categorized according to department policy. | |
| Response: QA Sergeants to distribute list of uncategorized BWC videos to Supervisors monthly. Direct supervisors will review report and ensure officers update the evidence appropriately. QA Manual will be updated to reflect changes. | Target Date: 9/1/2024 |
| Rec. # 1.3: Categorize all backlogged uncategorized BWC videos. | |
| Response: QA will monitor backlogged uncategorized BWC videos monthly and notify the officer's chain of command (as needed) until they are resolved. QA Manual will be updated to reflect new changes. Department will determine resources to update uncategorized evidence by former employees. | Target Date: 01/01/2026 |
| Explanation, Target Date > 90 Days: There is a significant number of backlogged BWC videos to be address that will require resources throughout the department. Due to constraint of staffing and budget, We are projecting a reasonable date of completion to comply with the categorization standard. | |
| Rec. # 1.4: Establish and document a policy and procedure for QA Sergeants to review and report on categorization accuracy as part of their monthly random BWC video reviews. | |
| Response: QA will ensure that videos are accurately categorized during their random BWC reviews. Discrepancies will be noted in the monthly MMR report. QA Manual will be updated to reflect new changes. | Target Date: 09/01/2024 |
| Rec. # 1.5: Establish a policy and procedure that requires QA Sergeants to review and report on BWC power cycling data in Precinct Monthly Management Reports. | |
| Response: BWC power cycling data to be added to QA portion of the Monthly Management Report. QA Manual will be updated to reflect new changes. Starting date to be determined upon approval of the metric for the BWC power cycling. | Target Date: 09/01/2024 |

| | |
|---|--|
| Rec. # 1.6: Establish and document a power cycling metric that officers must meet to comply with department policy. | |
| Response: Establish metric for the BWC power cycling. Department Policy and QA Manual will be updated to reflect new changes. | <u>Target Date:</u> 09/01/2024 |
| Rec. # 2.1: Update Police procedures to reflect which Evidence.com KPIs will be monitored and reported on. | |
| Response: The BWC Unit will continue to utilize off-the-shelf reports contained within Evidence.com to capture and report elements such as, but not limited to, activation rates, categorization, power-cycling. Procedures will be updated to reflect currently tracked KPIs. | <u>Target Date:</u> 9/1/2024 |
| Rec. # 2.2: Create procedures for what information will be included in BWC Unit MMRs including summaries of how many uncategorized videos exist. | |
| Response: The BWC Unit will utilize off-the-shelf reports contained with Evidence.com to capture and report uncategorized content contained within Evidence.com, on a monthly basis. Currently documented procedures will be updated as necessary. | <u>Target Date:</u> 9/1/2024 |
| Rec. # 2.3: Implement a required standardized training for detective roles and responsibilities for Evidence.com. | |
| Response: The Body Worn Camera Unit (BSCU) developed training for the identified detective roles. The training materials will be revised as procedures change, and BWCU will work with leadership to make the training mandatory. | <u>Target Date:</u> 9/1/2024 |

1 – Quality Assurance Sergeant’s Roles and Responsibilities

Background

Eight QA Sergeants are assigned to the precincts and are responsible for reviewing body-worn camera compliance. This includes ensuring that users are activating and deactivating body-worn cameras according to policy, and ensuring videos are categorized accurately. As part of these reviews, QA Sergeants must review two random videos from each squad in their precinct every month and report any findings in the Precinct MMR.

We interviewed QA Sergeants and reviewed Police policies and procedures to understand the expectations and responsibilities for body-worn camera supervision and reporting. We tested Precinct MMRs for calendar year 2023 to determine what QA Sergeants reported on. We reviewed uncategorized body-worn camera videos created between January 1, 2023, and December 4, 2023, to determine how many uncategorized videos existed. We also analyzed average power cycling data from all seven precincts for February 2023. Additionally, we evaluated the Maryvale/Estrella precinct power cycling data by squad in October 2023, to determine whether body-worn cameras are being used according to department policy.

Results

Quality Assurance Sergeants lacked a standardized process for documenting and determining compliance for monthly random body-worn camera reviews.

We interviewed QA Sergeants and reviewed Police policy to determine QA Sergeant requirements for reviewing body-worn camera video and reporting on their findings. We also examined Precinct MMRs for calendar 2023 to determine whether there is a standardized and consistent process for documenting compliance in monthly random body-worn camera video review results.

The QA Sergeants varied in their responses on what they were looking for in their monthly random reviews of body-worn camera video. We noted that:

- All the QA Sergeants looked for officers activating their body-worn camera at the appropriate time and stating a reason for deactivation as required by policy.
- Some QA Sergeants stated that they also look for professionalism and appropriate conduct.
- Others stated that they do not look for potential misconduct and only review videos to comply with activation and deactivation policy requirements.
- One QA Sergeant stated that they notify the officer’s supervisor about potential misconduct seen in body-worn camera reviews instead of documenting it in the Precinct MMRs.

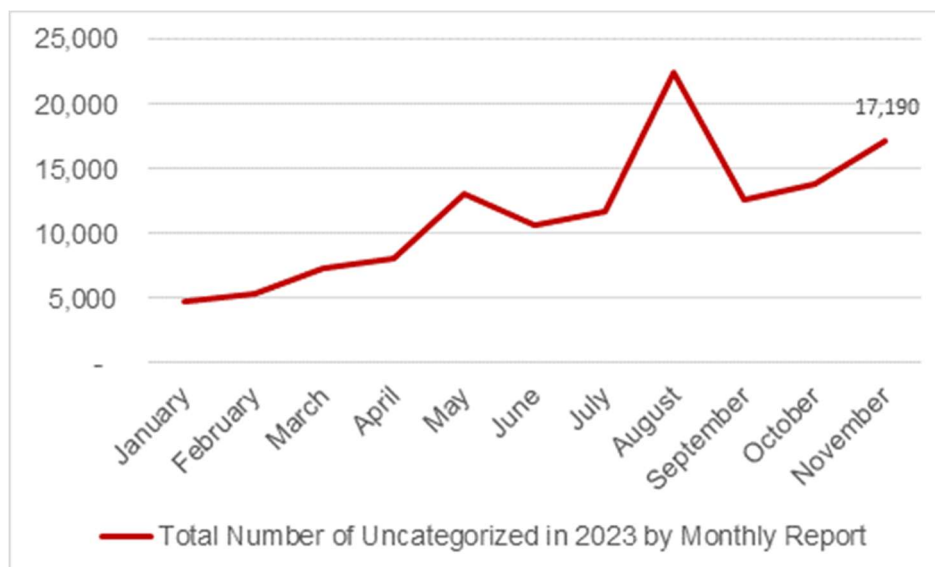
We also noted inconsistencies in Precinct MMR reporting. Two precinct MMRs included reports on potential misconduct observed in videos in addition to compliance with the activation and deactivation policy, while one Precinct MMR noted only positive officer interactions. The other four precincts only noted compliance with activating and deactivating body-worn cameras according to policy in the Precinct MMRs.

Police has not established procedures or trained QA Sergeants on what they should look for and report on in their body-worn camera video reviews. Without proper procedures and training, inconsistent application of Police policies may occur, and potential misconduct may be overlooked.

The Police Department did not categorize all uploaded body-worn camera videos according to department policy in 2023.

We analyzed Evidence.com uncategorized body-worn camera videos created between January 1, 2023, and December 4, 2023, to determine how many uncategorized videos existed. We also reviewed data from Evidence.com on how many body-worn videos were created monthly for the same period. Between January 1, 2023 and December 4, 2023, 2,150,469 body-worn camera videos were created.

Uncategorized Body-Worn Camera Videos in 2023



The Police Department had 17,190 uncategorized body-worn camera videos.

As of December 4, Police had 17,190 body-worn camera videos created in 2023 that remained uncategorized, including 613 videos created in January 2023, that remained uncategorized in December. Although the Body-Worn Camera Unit (BWC Unit) sent the QA Sergeants monthly lists of uncategorized videos, Police did not have a follow-up process to ensure that identified uncategorized videos were categorized. The longest outstanding videos in Evidence.com that remained uncategorized as of December 4,

2023, were recorded on September 2, 2020. Accurate video categorization is important because retention schedules could be inaccurately applied if videos are uncategorized, resulting in evidence that is deleted too soon.

Quality Assurance Sergeants are not reviewing and reporting on body-worn camera video categorization accuracy.

We interviewed QA Sergeants and reviewed Precinct MMRs from January to December 2023 to determine whether video categorization accuracy was reviewed. The QA Sergeants stated it was not their responsibility to review body-worn camera videos for categorization accuracy.

Despite Police indicating that it had implemented the prior recommendation of establishing and documenting procedures for reviewing categorization accuracy, Police did not have procedures for conducting and reporting on categorization accuracy reviews. Body-worn camera videos must be categorized accurately to ensure evidence is retained according to appropriate retention schedules.

The Police Department should review power cycling data to determine if officers were using body-worn cameras according to department policy.

Body-worn cameras remain in pre-buffer mode when they are on. When an officer activates the body-worn camera, the video automatically includes the 60 seconds of video captured during the pre-buffer mode prior to the camera being activated. When a body-worn camera is powered off, it takes between 15 to 20 seconds for the camera to power on and enter pre-buffer mode. If the camera is powered on and immediately activated, it does not capture the 60-second pre-event buffer period. Therefore, it is necessary that cameras be on at all times an officer is on duty.

We interviewed QA Sergeants and reviewed Precinct MMRs to determine whether power cycling reviews were conducted. We analyzed body-worn camera power cycling data from all precincts for February 2023 and power cycling data from the Maryvale/Estrella precinct by squad for October 2023 to determine whether body-worn cameras were being used according to department policy.

The QA Sergeants stated that although the data for power cycling is available in the Evidence.com dashboard, they do not review this data because the department does not require it.

Power Cycling by Precinct in February 2023

| Precinct | Percent of time body-worn camera is powered on while undocked |
|------------------|---|
| Black Mountain | 61.63% |
| South Mountain | 72.07% |
| Central City | 71.22% |
| Desert Horizon | 64.51% |
| Mountain View | 68.09% |
| Maryvale | 68.33% |
| Cactus Park | 69.73% |
| Precinct Average | 67.94% |

Body-worn cameras were powered on an average of 68% of the time they were undocked across the precincts.

Body-worn cameras were powered on between 62% to 72% of time while undocked in February 2023. In October 2023, 31 of the 40 squads assigned to the Maryvale/Estrella precinct had their body-worn cameras turned on less than 80% of the time that it was undocked in the month. Nine of those squads had their body-worn cameras turned off over 50% of the time that they were undocked.

Police had not established a target for an acceptable amount of time a body-worn camera can be powered off while not docked. Police also did not have a policy or procedure for reviewing or reporting on body-worn camera power cycling data. If officers do not have their body-worn cameras powered on and ready to activate while on duty, critical incidents might be missed.

Although the Field Based Reporting accuracy was not monitored or reported on, body-worn camera video indication is no longer a relevant field in Field Based Reporting.

When an incident occurs, officers are required to complete Field Based Reporting (FBR) forms to document the incident. As part of this reporting, Operations Order 4.49 requires every user to document the existence of any body-worn camera video in the FBR form. We interviewed QA Sergeants, analyzed Police procedures for monitoring and reporting on FBR accuracy, and reviewed Precinct MMRs for the period of January to December 2023 to determine whether FBR accuracy was monitored or reported on in compliance with Police procedures.

Police procedures state that reporting on FBR accuracy monitoring would be documented in the Precinct MMR; however, no information on FBR accuracy monitoring was present in any of the Precinct MMRs in 2023. The QA Sergeants stated that they do not monitor or report on FBR accuracy because Operations Order 4.49 requires that every officer wears and activate their body-worn camera while on duty, and as a result, this is no longer a relevant field in the FBR form.

Recommendations

- 1.1 Establish procedures and train QA Sergeants on what they must look for and report on during their monthly random BWC video reviews.
- 1.2 Create and document a process that includes timelines for follow-up (at least monthly) and roles and responsibilities for personnel responsible for ensuring that all BWC videos are categorized according to department policy.
- 1.3 Categorize all backlogged uncategorized BWC videos.
- 1.4 Establish and document a policy and procedure for QA Sergeants to review and report on categorization accuracy as part of their monthly random BWC video reviews.
- 1.5 Establish a policy and procedure that requires QA Sergeants to review and report on BWC power cycling data in Precinct Monthly Management Reports.
- 1.6 Establish and document a power cycling metric that officers must meet to comply with department policy.

2 – Body-Worn Camera Unit Roles and Responsibilities

Background

Operations Order 4.49 establishes the guidelines for the use and management of body worn camera video and Evidence.com technology. The BWC Unit is given responsibility for monitoring policy, operations, and law and ensuring that the policy is updated accordingly. The Operations Order also requires that employees receive training appropriate for their level of participation with body worn cameras and Evidence.com.

Police has procedures that identify and outline 11 Key Performance Indicators (KPIs) to monitor Evidence.com performance that must be reported in the BWC Unit Monthly Management Reports (BWC MMR). The established KPIs measure Evidence.com metrics, including how much video evidence is created, deleted, and shared, how it is categorized, how many users and devices exist in the system, and whether synchronization between systems is occurring as required. The procedures also require the BWC Unit to conduct Evidence.com user audits to ensure users have appropriate system access.

We interviewed Police personnel, reviewed procedures, and tested BWC MMRs to determine if KPIs were monitored and reported on and verified that Evidence.com user audits were performed at least quarterly. We also tested training documents to determine if Police provided detectives the required training on their roles in Evidence.com.

Results

The Police Department did not report on Key Performance Indicators as required by department procedures.

We interviewed the BWC Unit Sergeant, analyzed Police procedures for KPI reporting, and tested BWC MMRs for January to December 2023, to determine if key performance indicators for Evidence.com were monitored.

Key Performance Indicator Reporting

| Key Performance Indicator | KPI Reported as Required |
|-------------------------------------|--------------------------|
| Computer Aided Dispatch Integration | Yes |
| Device Summary | Yes |
| Evidence Created | Yes |
| Evidence Deleted | Yes |
| Sharing Evidence | Yes |
| User Summary | Yes |
| Axon Video Summary | Partially |
| Uncategorized Evidence | Partially |
| Server Synchronization | No |
| User Device History | No |
| Video Category Summary | No |

The BWC Unit Sergeants fully reported on six of the required KPIs in 2023.

The procedures did not state what level of reporting was required for each KPI. The reports included the Uncategorized Evidence and Axon Video Summary KPIs, but did not detail how many uncategorized videos existed, or any information about what the Axon Video Summary included.

The Police Department conducted reviews of Evidence.com users for appropriate access as required.

The Information Technology Bureau (ITB) uses Active Directory to ensure accurate user access for Police systems including Evidence.com. When a user terminates employment with Police, Active Directory should automatically remove the user's access. Active Directory is also responsible for ensuring that users have the appropriate level of access to Police systems based on their user permission groups. If a user needs to change permission groups, a ticket must be submitted to ITB.

We interviewed the BWC Unit Sergeant, analyzed Police procedures for user permission audits, and tested BWC MMRs from January to December 2023 to determine if Evidence.com accounts were reviewed quarterly to ensure users had appropriate access.

The BWC Unit conducted user audits every month in 2023. The BWC Unit Sergeant submitted tickets to ITB when users needed permission changes. The user audit results were reported monthly in the BWC MMR.

The Police Department does not have mandatory training for detectives on their role in Evidence.com.

Operations Order 4.49 gives detectives the responsibility for reviewing digital media associated with their assigned cases and requires that detectives review, respond to, or forward body-worn camera video public records requests where redacted video has been sent to them for review from the BWC Unit. Detectives do not wear body-worn cameras in their normal duties; however, they rely on evidence created with body-worn cameras worn by patrol and other officers for their investigations.

We interviewed Police personnel to determine detective roles and responsibilities in Evidence.com. We tested Police's Evidence.com training to determine whether Police had mandatory training for detectives on their role in Evidence.com.

Police personnel identified five roles that detectives had in Evidence.com related to body-worn camera video evidence. Police created trainings for Evidence.com that covered all of the five detective roles. However, detectives were not required to take any of the training courses.

Recommendations

- 2.1 Update Police procedures to reflect which Evidence.com KPIs will be monitored and reported on.
- 2.2 Create procedures for what information will be included in BWC Unit MMRs including summaries of how many uncategorized videos exist.
- 2.3 Implement a required standardized training for detective roles and responsibilities for Evidence.com.

Appendix A - Prior Recommendations and Implementation Status

| Recommendation | Implementation Status |
|--|-----------------------|
| 2.3 Determine how long the redaction process takes and re-evaluate the redaction timing policy. | Implemented |
| 4.2 In compliance with City IT Standard s1.3- Identity Management, regularly (at least quarterly) review Evidence.com for user accounts that have not accessed the system in 90 days and disable access to any that are found. | Implemented |
| 4.3 Establish and document procedures to review active directory sync emails. | Implemented |
| 5.1 Review and enable applicable field validation controls in Evidence.com for key fields. | Implemented |
| 5.2 Establish and document procedures to identify and correct key data fields with incomplete or invalid data. | Implemented |
| 5.3 Establish and document procedures to review video deletion emails. | Implemented |
| 5.4 Establish and document procedures to review video retention, at least annually, to ensure videos are not retained past the defined record retention period. | Implemented |
| 5.5 Work with Axon to determine the error types and reasons contained in the CAD emails. Determine if procedures should be established to review and remediate the errors. | Implemented |
| 6.1 Update PPD record retention schedules to include body camera videos. | Implemented |
| 6.2 Continue to work with the City Prosecutor to identify and record retention periods for body camera videos. | Implemented |

| Recommendation | Implementation Status |
|---|---|
| 7.1 Review license use and identify any assigned licenses that are not needed. Amend the contract accordingly. | Implemented |
| 7.2 Evaluate data storage use and perform a cost analysis to determine the full costs of body camera video storage. | Implemented |
| 6.5 Identify applicable key performance indicators for Evidence.com and body camera equipment. | Partially Implemented, see Recommendations 2.1, 2.2 |
| 6.7 Create a standardized Evidence.com training program that applies to detectives and reflects their expected role within the BWC program. | Partially Implemented, see Recommendation 2.3 |
| 2.1 Complete current process of categorizing videos without categories. | Not Implemented, see Recommendations 1.2, 1.3 |
| 2.2 Establish and document procedures to have supervisors review categorization accuracy. | Not Implemented, see Recommendation 1.4 |
| 3.3 Establish standard operating procedures related to the use of XappAp. If PPD decides not to use the application, ensure distribution of formal communication to all staff with instructions not to use the application. PPD should implement an automated control, such as disallowing access to the website from the City network or City devices. | No longer applicable |
| 6.8 Establish standard operating procedures to monitor FBR reporting accuracy, specifically reporting the existence of BWC evidence. | No longer applicable |

Scope, Methods, and Standards

Scope

We evaluated Police's process for managing its body worn cameras. In addition, we performed testing of Police monitoring and reporting of field-based reporting, key performance indicators, body worn camera video categorization completion and accuracy, power cycling, and monthly random body worn camera reviews. We also reviewed Police-provided Evidence.com training for detectives. Report testing covered calendar year 2023. Body worn camera video categorization covered the period from January 1, 2023, through December 7, 2023. Training materials covered calendar years 2022 and 2023.

The internal control components and underlying principles that are significant to the audit objectives are:

- Control Activities
 - Management should design control activities to achieve objectives and respond to risks.
 - Management should design the entity's information system and related control activities to achieve the objectives and respond to risks.
 - Management should implement control activities through policies.
- Monitoring Activities
 - Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
- Information and Communication
 - Management should internally communicate the necessary quality information to achieve the entity's objectives.

Methods

We used the following methods to complete this audit:

- Reviewed Police policies and procedures governing body worn camera management.
- Interviewed Police personnel responsible for managing and monitoring body worn camera usage.
- Identified and tested key controls over Police body worn cameras.
- Analyzed Police processes for compliance with department policy.
- Reviewed Police training materials, monthly management reports and evidence.com data.

Unless otherwise stated in the report, all sampling in this audit was conducted using a judgmental methodology to maximize efficiency based on auditor knowledge of the population being tested. As such, sample results cannot be extrapolated to the entire population and are limited to a discussion of only those items reviewed.

Data Reliability

We assessed the reliability of Evidence.com data by interviewing agency officials knowledgeable about the data. We determined that this data was sufficiently reliable for the purposes of this audit.

Standards

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. Any deficiencies in internal controls deemed to be insignificant to the audit objectives but that warranted the attention of those charged with governance were delivered in a separate memo. We are independent per the generally accepted government auditing requirements for internal auditors.