



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



**AUDIT OF THE OFFICE OF COMMUNITY  
ORIENTED POLICING SERVICES CHILD  
SEXUAL PREDATOR PROGRAM GRANT  
AWARDED TO THE  
SUPERIOR, WISCONSIN,  
POLICE DEPARTMENT**

**AUDIT OF THE OFFICE OF COMMUNITY ORIENTED POLICING  
SERVICES CHILD SEXUAL PREDATOR PROGRAM GRANT  
AWARDED TO THE  
SUPERIOR, WISCONSIN, POLICE DEPARTMENT**

**EXECUTIVE SUMMARY**

The U.S. Department of Justice, Office of the Inspector General, Audit Division, has completed an audit of an Office of Community Oriented Policing Services (COPS Office), 2011 Child Sexual Predator Program (CSPP) grant for \$499,852 awarded to the city of Superior, Wisconsin, Police Department (Superior PD). The Superior PD received grant number 2011-CS-WX-0020 to support its efforts to combat sexual crimes against children. The purpose of the grant was to allow the Superior PD to expand the efforts of a four-agency, multi-state task force by: (1) paying for additional officers from the agencies to work on the task force; (2) purchasing electronic equipment and software to enhance the task force's ability to analyze seized hard drives, cameras, and mobile devices that might contain evidence of sexual crimes against children; and (3) affording personnel greater opportunity to apprehend non-compliant sexual offender registry offenders.

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) local matching funds; (6) property management; (7) program income; (8) federal financial reports and progress reports; (9) grant requirements; (10) program performance and accomplishments; and (11) monitoring of sub-grantees and contractors. We determined that local match, program income, and oversight of sub-grantees and contractors were not applicable to this grant.

As of August 31, 2013, the grantee had drawn down \$399,520 and had recorded expenditures of \$399,520 in its grant accounting records. We examined the Superior PD's accounting records, required financial and progress reports, and operating policies and procedures, and we identified weaknesses in the Superior PD's documentation of its written procedures, as well as in its approval of invoices and timesheets for task force officers.

Our report contains two recommendations to address the preceding issues, which are discussed in detail in the Findings and Recommendations section of the report. Our audit objective, scope, and methodology are discussed in Appendix 1 of the report.

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## INTRODUCTION

The U.S. Department of Justice, Office of the Inspector General, Audit Division, has completed an audit of an Office of Community Oriented Policing Services (COPS Office), 2011 Child Sexual Predator Program grant for \$499,852 awarded to the city of Superior, Wisconsin, Police Department (Superior PD). The Superior PD received grant number 2011-CS-WX-0020 to support its efforts to combat sexual crimes against children. The purpose of the grant was to allow the Superior PD to expand the efforts of the Lake Superior Forensic Technology & Internet Crimes Against Children Task Force (task force), a four-agency, multi-state task force, by: (1) paying for additional officers from the agencies to work on the task force; (2) purchasing electronic equipment and software to enhance the task force's ability to analyze seized hard drives, cameras, and mobile devices that might contain evidence of sexual crimes against children; and (3) affording personnel greater opportunity to apprehend non-compliant sexual offender registry offenders.

As shown in Table 1 below, the COPS Office awarded the Superior PD a total of \$499,852 to implement the grant program.

**TABLE 1. OFFICE OF COMMUNITY ORIENTED POLICING SERVICES  
GRANT AWARDED TO THE SUPERIOR POLICE DEPARTMENT**

<b>AWARD NUMBER</b>	<b>AWARD START DATE</b>	<b>AWARD END DATE</b>	<b>AWARD AMOUNT</b>
2011-CS-WX-0020	08/01/2011	07/31/2014	\$499,852

Source: COPS Office

### Background

The purpose of the COPS Child Sexual Predator Program is to reduce child endangerment by providing grants to state, local, and tribal governments to help them locate, arrest, and prosecute child sexual predators and exploiters, and to enforce state sex offender registration laws.

The city of Superior, Wisconsin, is located in Douglas County, Wisconsin, in the northwest corner of the state, directly across the St. Louis River from Duluth, Minnesota. The cities of Superior and Duluth form a single metropolitan area. The task force is composed of officers from the Duluth, Minnesota, Police Department; the St. Louis County, Minnesota, Sheriff's Office; the Douglas County, Wisconsin, Sheriff's Office; and the Superior PD. The Superior PD physically houses and leads the task force.

Each of the four law enforcement agencies assigned sworn personnel to the task force to investigate child sexual abuse cases. Moreover, the Superior PD maintains a forensic laboratory that allows task force officers to search electronic

devices for evidence of sexual crimes against children.<sup>1</sup> As part of their duties, task force officers conduct community outreach and training to explain to both adults and children in the community the dangers children face from sexual predators.

## **Our Audit Approach**

We tested compliance with what we consider the most important conditions of the grant. Unless otherwise stated in our report, the criteria we audited against are contained in the COPS 2011 COPS Child Sexual Predator Program Grant Owner's Manual (COPS Manual), the Code of Federal Regulations, Office of Management and Budget (OMB) Circulars, and the award documents. We tested the Superior PD's:

- **Accounting and Internal Controls** to determine whether the grantee had sufficient accounting and internal controls in place for the processing and payment of funds and controls were adequate to safeguard grant funds and ensure compliance with the terms and conditions of the grant;
- **Grant Drawdowns** to determine whether grant drawdowns were adequately supported in accordance with federal requirements;
- **Grant Expenditures** to determine the accuracy and allowability of costs charged to the grant;
- **Budget Management and Control** to examine the amounts budgeted and the actual costs for each approved cost category and determine if the grantee deviated from the approved budget, and if so, if the grantee received the necessary approval;
- **Grant Reporting** to determine whether the required reports were submitted on time and accurately reflected grant activity; and
- **Accomplishment of Grant Requirements** to determine if the grantee met or is capable of meeting the grant's objective and whether the grantee collected data and developed performance measures to assess accomplishment of the intended objective.

We also performed limited work and confirmed that the Superior PD did not generate or receive program income, was not required to contribute any local matching funds, and that funds were not awarded to sub-grantees or contractors. We therefore performed no testing in these areas.

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<sup>1</sup> Task force officials explained that the laboratory also assists local police agencies by analyzing electronic evidence in other criminal cases, such as robbery, arson, and murder.

## **FINDINGS AND RECOMMENDATIONS**

We identified weaknesses in the documentation, certification, and approval of task force officer timesheets. We also found weaknesses in the documentation of written procedures. Specifically, we found that a large number of timesheets we reviewed were not properly signed and that the timesheets of non-Superior PD task force officers were not required to be approved by the task force supervisor. Additionally, we found that the city of Superior and the Superior PD lacked a written policy for how invoices were to be approved and processed.

We performed audit work at the Superior PD in Superior, Wisconsin, where we obtained an understanding of the accounting system and reviewed a sample of grant expenditures. We reviewed the criteria governing grant activities, including the COPS Manual, relevant OMB Circulars, and the Code of Federal Regulations. In addition, we reviewed grant documents, including the application, award, budgets, and financial and progress reports. We also interviewed key Superior PD and city of Superior personnel and members of the task force.

### **Accounting and Internal Controls**

According to the COPS Manual, grant recipients are required to establish and maintain accounting and internal control systems to account accurately for funds awarded to them. Further, the accounting system should ensure, among other things, the identification and accounting for receipt and disposition of all funds, funds applied to each budget category included in the approved award, expenditures governed by any special and general provisions, and non-federal matching contributions, if applicable.

We reviewed the Superior PD's financial management system and its policies and procedures to assess the Superior PD's risk of non-compliance with laws, regulations, guidelines, and terms and conditions of the grant. To assess risk, we obtained an understanding of the reporting process, examined various grant accounting records and reports prepared by the Superior PD, and interviewed Superior PD and city of Superior personnel regarding grant expenditures. Our testing revealed internal control deficiencies involving a lack of written approval for invoices and timesheets. We explain these issues in more detail in the following sections.

#### *Financial Management System*

The COPS Manual requires grantees to establish and maintain a system of accounting and internal controls that adequately identifies and classifies grant costs. The system must include controls to ensure that funds and other resources are used optimally and expenditures of funds are in conformance with the general and special conditions applicable to the recipient. Further, the COPS Manual states that grantees should establish and maintain program accounts that will enable, on an individual basis, the separate identification and accounting of the receipt and

disposition of all funds and the application of all funds to each budget category included within the approved award.

We conducted a limited review of the Superior PD’s financial management system, which included interviewing personnel and observing accounting activities and processes. The Superior PD maintains its accounting records in an automated system. Based upon our review of the financial management system and interviews with Superior PD personnel, we found that the Superior PD’s internal control environment included an adequate separation of duties and that access to the accounting system was controlled. We also noted that the Superior PD maintained a separate ledger for its COPS Child Sexual Predator Program grant activity, and that the ledger tracked expenditures and reimbursements associated with the grant.

However, we found that neither the Superior PD nor the city of Superior had written procedures that detailed how invoices for purchases were to be approved and processed and who was responsible for approving and processing the invoices. Moreover, during our expenditure testing, we found that 10 of the 32 invoices we reviewed did not contain written approvals to pay. Thus, we recommend the city of Superior develop and disseminate written procedures that detail what position in each department is to approve invoices and who is to enter this information into the accounting system.

*Audit*

According to the special conditions of the agreement, the COPS Manual, and OMB Circular A-133, any organization that expends \$500,000 or more in federal funds in the organization’s fiscal year is required to have a single organization-wide audit conducted. As shown in Table 2, the city of Superior’s federal expenditures exceeded \$500,000 in fiscal years (FY) 2010, 2011, and 2012.<sup>2</sup>

**TABLE 2. CITY OF SUPERIOR’S  
EXPENDITURES OF FEDERAL FUNDS  
FISCAL YEARS 2010 THROUGH 2012**

<b>FISCAL YEAR</b>	<b>2010</b>	<b>2011</b>	<b>2012</b>
Total Federal Expenditures	\$5,655,884	\$2,748,875	\$4,067,703

Source: City of Superior Single Audit Reports

The city of Superior (of which the Superior PD is a part) has had a Single Audit conducted by an independent accounting firm in each of the previous 3 fiscal years in accordance with the provisions of OMB Circular A-133. We reviewed the independent auditors’ assessments, which disclosed no weaknesses, noncompliance issues, or crosscutting findings related to the city of Superior’s grant management.

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<sup>2</sup> The city of Superior’s fiscal year is January 1 through December 31.

## Grant Drawdowns

We reviewed the Superior PD's process for requesting reimbursement from the COPS Office for its grant-related costs to ensure that the requests were adequately supported by official accounting records and were in accordance with federal requirements. We compared the grantee's general ledger to the COPS Office's record of drawdowns, and we found that the drawdown amounts matched the expenditures as recorded in the general ledger. In total, the Superior PD received a total of \$399,520 through eight separate drawdowns.

## Grant Expenditures

The COPS Manual requires that expenditures be accounted for and be adequately supported. The Superior PD's approved grant budget is detailed in Table 3.

**TABLE 3. SUPERIOR POLICE DEPARTMENT'S APPROVED GRANT BUDGET AMOUNTS AND DESCRIPTION OF COSTS**

<b>COST CATEGORY</b>	<b>APPROVED FINAL BUDGET</b>	<b>DESCRIPTION OF PLANNED EXPENDITURES</b>
Personnel	\$227,814	Salary for staff
Fringe Benefits	121,089	Fringe benefits for staff
Travel/Training	26,000	Travel to conferences and training in the use of hardware and software purchased with grant funds
Supplies	0	
Contract/Consultant	0	
Other	74,950	Overtime and forensic investigation software
Equipment	49,999	Data processing equipment and software
Construction	0	
Indirect Costs	0	
<b>FEDERAL FUNDS</b>	<b>\$499,852</b>	
<b>LOCAL MATCH</b>	<b>\$0</b>	
<b>TOTAL PROJECT COSTS</b>	<b>\$499,852</b>	

Source: COPS Office and Superior PD

As of September 2013, 63 items totaling \$399,520 had been charged to the grant. We judgmentally selected 32 of these expenditures for review. These

32 items consisted of equipment, travel and training activities, and personnel expenses and totaled \$230,155, or 58 percent of the amount charged to the grant.

#### *Non-Personnel Expenditures*

Twelve of the 32 items we tested represented \$72,000 in grant funds spent on travel, training, and equipment. The grant paid for travel and training expenses related to a conference that the COPS Office required recipients of the Child Sexual Predator Program grants to attend, as well as for training in the use of hardware and software purchased with grant funds. The grant also paid for computer equipment and software that enhanced the task force's ability to analyze seized hard drives, cameras, and mobile devices. Our review of these expenditures did not reveal any discrepancies.

#### *Personnel Expenditures*

The majority of the budgeted expenditures were associated with personnel costs. At the time of our audit, the Superior PD had three officers on the task force, the St. Louis County Sheriff's Office had one officer on the task force, the Duluth PD had one officer on the task force, and the Douglas County Sheriff's Office had one officer on the task force.

The grant authorized funds for salaries, fringe benefits, and overtime. The Superior PD (which obtained and managed the grant) established guidelines for how each agency would be reimbursed, on a quarterly basis, by the grant. Specifically:

- Superior PD – reimbursement for salaries, fringe benefits, and overtime.
- Duluth PD – reimbursement for salaries and fringe benefits up to \$12,500 and overtime.
- St. Louis County Sheriff's Office – reimbursement for salaries and fringe benefits up to \$12,500 and overtime.
- Douglas County Sheriff's Office – reimbursement for overtime only.

Of the 32 items we selected for testing, 20 were personnel-related. We matched time cards to payroll registers to determine if each agency's task force officer worked enough hours to cover their agency's request for reimbursement for salary costs, fringe benefits, and overtime.<sup>3</sup> The time records we examined indicated that the task force officers had worked enough hours during each quarter we reviewed to cover the amount of salary, fringe benefits, and overtime that their agencies claimed for reimbursement for that quarter.

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<sup>3</sup> The Douglas County Sheriff's Office, Duluth Police Department, and the St. Louis County Sheriff's Office submitted invoices to the Superior PD for reimbursement, while the Superior PD, as the lead agency, made accounting entries for its reimbursements.

According to OMB Circular A-87 Revised, Cost Principles for State, Local, and Indian Tribal Governments, grant-funded employees working on multiple projects must sign their personnel activity reports or equivalent documentation showing the allocation of their time among the projects. Moreover, when employees work solely on one grant program, their activities must be supported by periodic certifications prepared at least semi-annually that are signed by the employee or supervisory official having first-hand knowledge of the work performed by the employee.

We identified an issue related to who approves time worked by task force officers. As mentioned, the task force is located within the Superior PD, and its operations are supervised by a Superior PD supervisor. However, instead of the task force supervisor reviewing and approving the time worked by the task force officers, supervisors from each task force officer's home agency approve the time worked. We believe this is an issue because the supervisors at the task force officers' home agencies do not directly supervise the task force officers and do not have first-hand knowledge of all the work completed by the task force officers whose time they are approving. While we understand that each agency has a separate time card and payroll system, we believe that a supervisor with first-hand knowledge of the work activities of the task force officers should be the one who is approving the time worked on these activities.

We also found that when we reviewed time records in our sample, many of them lacked the required signatures, as shown in Table 4.

**TABLE 4. TASK FORCE AGENCY TIME RECORD EXCEPTIONS<sup>4</sup>**

<b>Agency</b>	<b>Time Records Sampled</b>	<b>Timesheets Missing Officer Signature</b>	<b>Timesheets Missing Approval Signature</b>	<b>Overtime Cards Missing Approval Signature</b>	<b>Overtime Cards Missing Verification Signature</b>
Superior Police Department	76	48	0	N/A	N/A
Duluth Police Department	14	0	0	3	5
St. Louis County Sherriff's Office <sup>5</sup>	50	18	16	N/A	N/A
Douglas County Sheriff's Office	15	0	0	N/A	N/A
<b>Totals</b>	<b>155</b>	<b>66</b>	<b>16</b>	<b>3</b>	<b>5</b>

Source: Task Force agencies

As shown above, we found that 66 timesheets were missing officer verification signatures, 16 timesheets were missing approval signatures, 3 overtime cards were missing approval signatures, and 5 overtime cards were missing supervisory signatures. This is concerning because signatures on these documents mean the officers and supervisors are certifying that they are accurately reporting time worked on grant-related activities. We are concerned that if officers and supervisors do not sign the timesheets, as required, there is no guarantee that the number of hours the officers report as having worked on grant-related activities is accurate.

Thus, we recommend that the timesheets of task force officers be signed by the employee and a supervisor with direct knowledge of the work conducted by the employee.

### **Budget Management and Control**

The grant award's total project budget was \$499,852. We assessed the grantee's expenditures in the budget categories, and we determined that the Superior PD adhered to the grant requirements to spend grant funds within the approved budget categories.

<sup>4</sup> Officers from the Superior PD, the St. Louis County Sheriff's Office, and the Douglas County Sheriff's Office record both regular hours and overtime hours on a single timesheet. However, while officers from the Duluth PD record regular hours on their electronic timesheets, they utilize an "Overtime Card" when claiming overtime hours worked. These cards contain lines for approval and verification signatures, and we tested these as part of our analysis.

<sup>5</sup> Of the 18 St. Louis County Sheriff's Office timesheets missing officer signatures, 16 of them were also missing the approval signature.

## Grant Reporting

The COPS Manual states that the grantee is to submit two types of reports. The grantee must submit Federal Financial Reports (FFR), which provide information on monies spent and the unobligated amounts remaining in the grant, and Categorical Assistance Progress Reports, which provide information on the status of grant-funded activities and other pertinent information.

### *Federal Financial Reports*

The COPS Manual states that FFRs filed after October 1, 2009, are due within 30 days after the end of the calendar quarter. We reviewed the last four quarters for which a report was required and determined that all required reports were submitted within the required timeframe.

We also reviewed all submitted FFRs for accuracy and found that the reported expenditures on the FFRs reconciled to the auditee's grant accounting records.

### *Progress Reports*

According to the COPS Manual, Categorical Assistance Progress Reports are due when the COPS Office makes a request for them (generally annually). The COPS Office also stated that starting on July 1, 2013, it instituted a quarterly reporting requirement. As shown in Table 5, we reviewed the four most recent progress reports and found that the Superior PD had submitted them in a timely manner.

**TABLE 5. TIMELINESS OF PROGRESS REPORTS**

<b>REPORT NO.</b>	<b>REPORT PERIOD</b>	<b>DUE DATE</b>	<b>DATE SUBMITTED</b>	<b>DAYS LATE</b>
1	01/01/11 - 12/31/11	01/31/2012	01/23/2012	0
2	01/01/12 – 12/31/12	01/31/2013	01/18/2013	0
3	01/01/13 – 06/30/13	07/31/2013	07/03/2013	0
4 <sup>6</sup>	07/01/13 – 09/30/13	10/31/2013	10/31/2013	0

Source: COPS Office and Superior PD

We reviewed each of the submitted progress reports and found that the reports asked the grantee if it had satisfied all of the programmatic grant requirements," to which the Superior PD responded, "yes." In our review of grant-funded activities, we found the grant requirements had been met and that the progress reports provided adequate information to determine the status of the program for each period that each report covered.

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<sup>6</sup> Starting July 1, 2013, the COPS Office changed reporting from an "as requested" basis to quarterly.

## **Accomplishment of Grant Requirements**

The purpose of the grant was to allow the Superior PD to expand the efforts of a four-agency, multi-state task force by: (1) paying for additional officers from the agencies to work on the task force; (2) purchasing electronic equipment and software that will enhance the task force's ability to analyze seized hard drives, cameras, and mobile devices that might contain evidence of sexual crimes against children; and (3) affording personnel greater opportunity to apprehend non-compliant sexual offender registry offenders.

We compared the grant application and supporting documents to the accomplishments listed by the grantee in the progress reports, and we determined that the grantee had completed or was in the process of completing each of its goals. The grant funding increased the size of the task force by five officers, allowed the task force to purchase new equipment that enhanced its ability to analyze electronic devices, and increased the task force's ability to confirm the current registration of local sex offenders.

## **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 the COPS Office:

1. Require the city of Superior to establish and distribute to staff written policies and procedures that detail what position is responsible for initially approving invoices and what position within the finance department is responsible for approving and entering items into the accounting system.
2. Require that the timesheets of task force officers be signed by the employee and a supervisor with direct knowledge of the work conducted by the employee.

## OBJECTIVE, 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.

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 objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Our audit concentrated on, but was not limited to, the inception of the grant on August 1, 2011, through August 31, 2013. This was an audit of grant number 2011-CS-WX-0020 awarded to the Superior, Wisconsin, Police Department for \$499,852. In conducting our audit, we reviewed Federal Financial Reports (FFR) and progress reports and performed testing of grant expenditures, including reviewing supporting accounting records. We judgmentally selected a sample of expenditures and reviewed internal controls and procedures for the grant that we audited. Judgmental sampling design was applied to obtain broad exposure to numerous facets of the grant reviewed, such as dollar amounts, expenditure category, and risk. This non-statistical sample design does not allow for projection of the test results to all grant expenditures or internal controls and procedures. In total, the grantee had expended \$399,520 and drawn down \$399,520 as of August 31, 2013. We judgmentally selected 32 transactions, which included the 19 highest-dollar amounts, as well as 13 other transactions.

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) local matching funds; (6) property management; (7) program income; (8) federal financial reports and progress reports; (9) grant requirements; (10) program performance and accomplishments; and (11) monitoring of sub-grantees and contractors. We determined that local match, program income, and oversight of sub-grantees and contractors were not applicable to this grant.

We performed limited testing of source documents to assess the timeliness and accuracy of FFRs, reimbursement requests, expenditures, and progress reports; evaluated performance to grant objectives; and reviewed the grant-related internal controls over the financial management system. We tested invoices as of August 31, 2013. However, we did not test the reliability of the financial management system as a whole and reliance on computer-based data was not significant to our objective. We reviewed the grantee's past three Single Audit Reports, which 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 or noncompliance issues directly related to the Superior Police PD grant.

## AUDITEE RESPONSE



### Superior Police Department

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Superior, WI 54880

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September 19, 2014

Carol S. Taraszka  
Regional Audit Manager  
Chicago Regional Audit Office  
Office of the Inspector General  
U.S. Department of Justice  
500 West Madison Street, Suite 1121  
Chicago, IL 60661

Dear Ms. Taraszka,

I have received and read the draft audit report on the Audit of the Office of Community Policing Services Child Sexual Predator Program Grant Awarded to the Superior, Wisconsin, Police Department.

I appreciate the need to audit programs instituted through federal funding to ensure that the funds are being utilized as intended and that the agency receiving the grant funding is employing sound management and financial practices. The Superior Police Department is proud that the extensive audit showed that all funds were properly accounted for and used in accordance with the purpose areas defined in the grant application.

There were two areas of concern noted in the draft audit report.

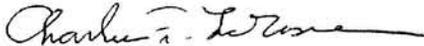
1. The City of Superior lacked a written policy that details what position is responsible for initially approving invoices.

Answer: The City of Superior has a policy that designates what specific individuals approve invoices. The policy refers to those people by name, rather than as a position. I understand that policies would be more durable if responsibilities were listed by position. I will share the audit concerns with our Finance Director for her consideration of making changes to policies to address this concern.

2. Timecards were not regularly signed by employees. Supervisors signing timecards were often not a supervisor from the Lake Superior Forensic Technology and Internet Crimes Against Children Task Force, and therefore lacked direct knowledge of the purpose of overtime claimed on the timecard.

Answer: The Superior Police Department will assure that all employees of this agency will sign their timecard before it is submitted to the Finance Department. The issue of employees who work for partner agencies in the Task Force is more complicated. Those employees do not have a timecard in this building and they must comply with the payroll systems in place in their home agencies. The Superior Police Department did maintain an Overtime Log sheet for each employee of the Task Force. This was signed by the Task Force Supervisor and was available for inspection by the signing supervisor in the home agency. The home agencies sent payroll records to the Task Force Commander and they were filed with the Overtime Log Sheets. Through this system, the Task Force Commander could assure that no overtime expenses were paid through grant funding for work not associated with the work of the grant funded task force.

Sincerely,



Charles F. LaGesse  
Chief of Police

## U.S. DEPARTMENT OF JUSTICE RESPONSE



U.S. DEPARTMENT OF JUSTICE  
OFFICE OF COMMUNITY ORIENTED POLICING SERVICES

**COPS**

Grant Operations Directorate/Grant Monitoring Division  
145 N Street, N.E., Washington, DC 20530

## MEMORANDUM

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

From: Troy V. Williams   
Supervisory Grant Monitoring Specialist

Date: October 22, 2014

Subject: Response to the Draft Audit Report for Superior, Wisconsin, Police Department

This memorandum is in response to your September 19, 2014 draft audit report on COPS Child Sexual Predator Program Grant #2011CSWX0020 awarded to the Superior, Wisconsin Police Department (SWPD). For ease of review, each audit recommendation is stated in bold and underlined, followed by a response from COPS concerning the recommendation.

**Recommendation 1 – Require the City of Superior to establish and distribute to staff written policies and procedures that detail what position is responsible for initially approving invoices and what position within the finance department is responsible for approving and entering items into the accounting system.**

The COPS Office concurs that SWPD should establish and/or distribute written policies and procedures detailing what position is responsible for initial approval of invoices and what position - within the finance department - is responsible for approving and entering items into the accounting systems.

**Planned Action**

The COPS Office will work with the grantee to ensure that the aforementioned policies and procedures are in place and distributed to staff.

**Request**

Based on the planned action, COPS requests resolution of Recommendation 1.

ADVANCING PUBLIC SAFETY THROUGH COMMUNITY POLICING

Carol S. Taraszka  
Regional Audit Manager  
Office of the Inspector General  
October 22, 2014  
Page 2

**Recommendation 2 – Require that the timesheets of task force officers be signed by the employee and a supervisor with direct knowledge of the work conducted by the employee.**

The COPS Office concurs that SWPD should require that task force officers' time sheets be signed by the employee and a supervisor with direct knowledge of the work conducted by the officer(s).

**Planned Action**

The COPS Office will work with the grantee to ensure that the recommended procedure for validating task force officers' timesheets is implemented.

**Request**

Based on the planned action, COPS requests resolution of Recommendation 2.

cc: Richard P. Theis  
Justice Management Division

George Gibmeyer  
Grant Monitoring Division

The Honorable Bruce Hagen  
Mayor, City of Superior

Chief Charles LaGesse  
City of Superior Police Department

Grant File: Child Sexual Predator Program Grant #2011CSWX0020

ORI: WI01601

Date: October 24, 2014

**OFFICE OF THE INSPECTOR GENERAL  
ANALYSIS AND SUMMARY OF ACTIONS  
NECESSARY TO CLOSE THE REPORT**

The OIG provided a draft of this audit report to the Superior, Wisconsin, Police Department (Superior PD) and the U.S. Department of Justice, Office of Community Oriented Policing Services (COPS Office). The Superior PD's response letter is incorporated in Appendix 2 of this final report, and the COPS Office's response is incorporated as Appendix 3. The following provides the OIG analysis of the responses.

**Recommendation:**

1. **Require the city of Superior to establish and distribute to staff written policies and procedures that detail what position is responsible for initially approving invoices and what position within the finance department is responsible for approving and entering items into the accounting system.**

Resolved. In its response, the Superior PD stated that it will share with the city's Finance Director the audit concerns for her consideration of making changes to policies to address this issue. The COPS Office concurred with our recommendation and stated in its response that it will work with the Superior PD to ensure that the aforementioned policies and procedures are in place and distributed to staff.

This recommendation can be closed when we receive evidence that the city of Superior has established and distributed to the appropriate staff members written policies and procedures to identify the position responsible for initially approving invoices and the position within the finance department that is responsible for approving and entering items into the accounting system.

2. **Require that the timesheets of task force officers be signed by the employee and a supervisor with direct knowledge of the work conducted by the employee.**

Resolved. In its response, the Superior PD stated that it will ensure all Superior PD employees sign their timecards before they are submitted to the Finance Department. The Superior PD also said that the issue of employees who work for partner agencies in the Task Force is more complicated because those employees do not have a timecard in the Superior PD building, and they must comply with the payroll systems in place in their home agencies. The Superior PD stated that it maintains an overtime log sheet for each employee of the Task Force, which was signed by the Task Force Supervisor and available for inspection by the signing supervisor in the home agency. The Superior PD further stated that the home agencies sent payroll records to the Task Force Commander, and they were filed with the overtime log sheets. According to the Superior PD, through this system, the Task Force Commander

could ensure that no overtime expenses were paid through grant funding for work not associated with the work of the grant-funded task force.

While we understand the difficulties in working with the timekeeping systems of several different agencies, we believe it is important for a supervisor with direct knowledge of the work being performed by an employee to be the person approving the timesheets of that employee. Additionally, while the home agencies sent payroll records to the Superior PD to make them available for review, we found no evidence that this review was conducted. Further, we found no evidence that these records were reconciled to the other agencies' requests for reimbursement to ensure that the use of grant funds was fully supported and appropriate.

The COPS Office concurred with our recommendation and stated in its response that it will work with the Superior PD to ensure that the recommended procedure for validating task force officers' timesheets is implemented.

This recommendation can be closed when we receive evidence that the Superior PD has implemented a process that ensures that timesheets of task force officers are signed by the employee and a supervisor with direct knowledge of the work conducted by the employee.

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