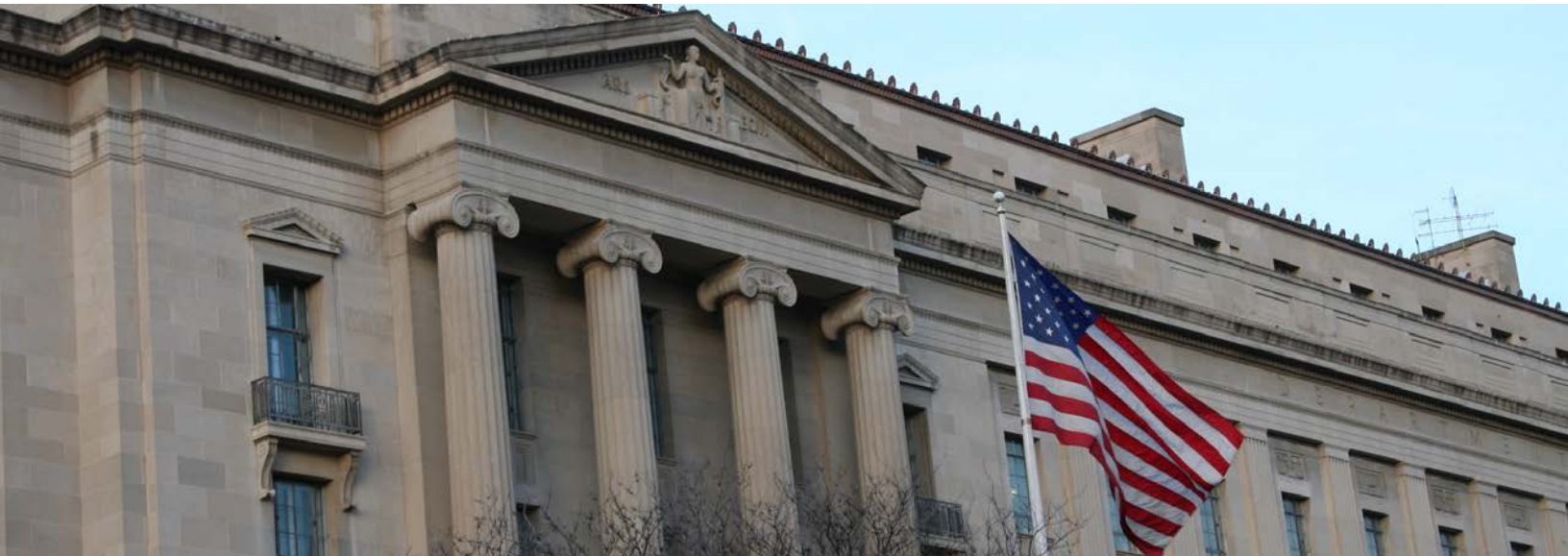




Office of the Inspector General
U.S. Department of Justice

OVERSIGHT ★ INTEGRITY ★ GUIDANCE



**Audit of the Minneapolis-Saint Paul
International Airport Police
Department's Equitable Sharing
Program Activities
Minneapolis, Minnesota**



Executive Summary

Audit of the Minneapolis Saint Paul International Airport Police Department's Equitable Sharing Program Activities, Minneapolis, Minnesota

Objective

The U.S. Department of Justice (DOJ) Office of the Inspector General (OIG) has completed an audit to assess whether the Minneapolis-Saint Paul International Airport Police Department (MSP Airport PD) accounted for DOJ equitable sharing funds properly and used such assets for allowable purposes as defined by applicable guidelines.

Results in Brief

We found that the MSP Airport PD generally complied with the requirements of the DOJ Equitable Sharing Program. Specifically, we found that the MSP Airport PD properly accounted for its DOJ equitable sharing resources and separately accounted for all receipts and expenditures. In addition, we determined that the MSP Airport PD's annual Equitable Sharing Agreement and Certification (ESAC) reports were accurate and submitted in a timely manner. Further, we reviewed a sample of expenditures paid for with DOJ equitable sharing funds, and we confirmed that all were for allowable purposes. Moreover, we noted that the MSP Airport PD had formalized written procedures for managing its DOJ equitable sharing activities. However, we noted that because the MSP Airport PD did not adhere to its established records retention schedule, it did not completely comply with DOJ Equitable Sharing Program guidelines, and some expenditure-related documentation had not been retained.

Recommendation

Our report includes one recommendation to assist the DOJ Criminal Division, which oversees the DOJ Equitable Sharing Program, in ensuring that the MSP Airport PD retains records on equitable sharing expenditures in accordance with its policy and DOJ equitable sharing guidelines. We provided a draft of this report to the MSP Airport PD and the Criminal Division, whose responses can be found in Appendices 2 and 3, respectively. Our analysis of both responses, as well as a summary of actions necessary to close the recommendation can be found in Appendix 4 of this report.

Audit Results

Equitable sharing revenues represent a share of the proceeds from the forfeiture of assets seized in the course of certain criminal investigations. During the period of January 1, 2016, through December 31, 2018, the MSP Airport PD received \$800,080 and spent \$530,269 in DOJ equitable sharing funds. According to reports submitted to the DOJ Criminal Division, the MSP Airport PD used equitable sharing funds to pay for investigation-related costs, as well as other law enforcement-related expenses, such as training, equipment, contracts for services, law enforcement awards and memorials, and travel.

In determining whether the MSP Airport PD complied with applicable equitable sharing guidelines, we identified one area in need of improvement related to the MSP Airport PD's retention of program records.

Accounting for and Use of Equitable Sharing

Funds – We found that the MSP Airport PD properly accounted for all of its DOJ equitable sharing receipts and expenditures and separately accounted for all expenditures paid for with DOJ equitable sharing funds. However, we found that the MSP Airport PD did not adhere to its established records retention schedule and, as a result, was not retaining complete records for all of its equitable sharing expenditures, which is required under the DOJ Equitable Sharing Program.

Equitable Sharing Agreement and Certification

Reports – We reviewed the ESAC reports the MSP Airport PD submitted for fiscal years 2016, 2017, and 2018, and we determined that the reports accurately reflected how the MSP Airport PD spent its DOJ equitable sharing funds by expenditure category.

**AUDIT OF THE MINNEAPOLIS-SAINT PAUL
INTERNATIONAL AIRPORT POLICE DEPARTMENT'S
EQUITABLE SHARING PROGRAM ACTIVITIES,
MINNEAPOLIS, MINNESOTA**

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AUDIT OF THE MINNEAPOLIS-SAINT PAUL INTERNATIONAL AIRPORT POLICE DEPARTMENT'S EQUITABLE SHARING PROGRAM ACTIVITIES, MINNEAPOLIS, MINNESOTA

INTRODUCTION

The Department of Justice (DOJ) Office of the Inspector General (OIG) completed an audit of equitable sharing funds received by the Minneapolis-Saint Paul International Airport Police Department (MSP Airport PD) in Minneapolis, Minnesota. The objective of the audit was to assess whether the revenue received by the MSP Airport PD through the DOJ Equitable Sharing Program was accounted for properly and used for allowable purposes as defined by applicable regulations and guidelines. The audit covered the MSP Airport PD's fiscal years (FY) 2016, 2017, and 2018 (January 1, 2016, through December 31, 2018). During that period, the MSP Airport PD received \$800,080 and spent \$530,269 in equitable sharing revenues as a participant in the DOJ Equitable Sharing Program.

DOJ Equitable Sharing Program

The Comprehensive Crime Control Act of 1984 authorized the implementation of the DOJ Asset Forfeiture Program.¹ The Asset Forfeiture Program is a nationwide law enforcement initiative that removes the tools of crime from criminal organizations, deprives wrongdoers of the proceeds of their crimes, recovers property that may be used to compensate victims, and deters crime. A key element of the Asset Forfeiture Program is the Equitable Sharing Program. The DOJ Equitable Sharing Program allows state or local law enforcement agencies that directly participate in an investigation or prosecution resulting in a federal forfeiture to claim a portion of federally forfeited cash, property, and proceeds.

Although several DOJ agencies are involved in various aspects of the seizure, forfeiture, and disposition of equitable sharing revenues, three DOJ components work together to administer the Equitable Sharing Program – the United States Marshals Service (USMS), the Justice Management Division (JMD), and the Criminal Division's Money Laundering and Asset Recovery Section (MLARS).² The USMS is responsible for transferring asset forfeiture funds from DOJ to the receiving state or local agency. JMD manages the Consolidated Asset Tracking System (CATS), a database used to track federally seized assets throughout the forfeiture life-cycle. MLARS tracks membership of state and local participants, updates the Equitable Sharing Program rules and policies, and monitors the allocation and use of equitably shared funds.

¹ The U.S. Department of the Treasury also administers a federal asset forfeiture program, which includes participants from the Department of Homeland Security. This audit was limited to equitable sharing revenues received through the DOJ Equitable Sharing Program.

² A few non-DOJ components also fall under the auspices of the DOJ Equitable Sharing Program, including the U.S. Postal Inspection Service (USPIS).

State and local law enforcement agencies may receive equitable sharing funds by participating directly with DOJ agencies on investigations that lead to the seizure and forfeiture of property, or by seizing property and requesting that one of the DOJ agencies adopt the seizure and proceed with federal forfeiture. Once an investigation is completed and the seized assets are forfeited, the assisting state and local law enforcement agencies can request a share of the forfeited assets or a percentage of the proceeds derived from the sale of forfeited assets. Generally, the degree of a state or local agency's direct participation in an investigation determines the equitable share allocated to that agency.

To request a share of seized assets, a state or local law enforcement agency must first become a member of the DOJ Equitable Sharing Program. Agencies become members of the program by signing and submitting an annual Equitable Sharing Agreement and Certification (ESAC) report to MLARS. As part of each annual agreement, officials of participating agencies certify that they will use equitable sharing funds for allowable law enforcement purposes. The Guide to Equitable Sharing for State and Local Law Enforcement Agencies, issued by MLARS in April 2009; the Interim Policy Guidance Regarding the Use of Equitable Sharing Funds, issued by MLARS in July 2014; and the Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies, issued by MLARS in July 2018, outline categories of allowable and unallowable uses for equitable sharing funds and property.³

Minneapolis-Saint Paul International Airport Police Department

The MSP Airport PD is located inside the Minneapolis-Saint Paul International Airport in Minneapolis, Minnesota. The MSP Airport PD is led by a Chief of Police who is also the Director of Public Safety for the airport. The Department of Public Safety is comprised of three units: (1) the MSP Airport PD, (2) the airport Fire Department, and (3) the airport Emergency Management Service. Along with the Chief/Director, the MSP Airport PD staff includes Deputy Chiefs, Lieutenants, sergeants, officers, investigators, administration support staff, and traffic control agents. The MSP Airport PD's responsibilities consist of, but are not limited to, airport patrols, investigations, security, training, and administration.

The Chief/Director reports to the Metropolitan Airport Commission, a public corporation created by Minnesota state law in 1943, which provides coordinated aviation services throughout the Twin Cities metropolitan area. As of December 2018 the MSP Airport PD had a workforce of 118 sworn officers, which included 31 part-time police officers and 55 civilian employees. In addition, the MSP Airport PD had an authorized Emergency Communications Center staff of 18 non-sworn employees.

³ In July 2018, an updated Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies was issued, covering both DOJ and Treasury equitable sharing programs. Because the scope of our audit was focused on activities that occurred during FYs 2016, 2017, and 2018, we relied upon all three pieces of criteria in carrying out the audit.

OIG Audit Approach

We tested the MSP Airport PD's compliance with what we considered to be the most important conditions of the DOJ Equitable Sharing Program to assess whether it accounted for equitable sharing funds properly and used such revenues for allowable purposes. Unless otherwise stated, we applied the Guide to Equitable Sharing for State and Local Law Enforcement Agencies, issued by MLARS in April 2009; the Interim Policy Guidance Regarding the Use of Equitable Sharing Funds, issued by MLARS in July 2014; and the Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies, issued by MLARS in July 2018, as our primary criteria. These documents provide procedures for submitting sharing requests and discuss the proper use of and accounting for equitable sharing assets. To conduct the audit, we tested the MSP Airport PD's compliance with the following:

- **Accounting for equitable sharing resources** to determine whether standard accounting procedures were used to track equitable sharing assets.
- **Equitable Sharing Agreement and Certification Reports** to determine if these documents were complete and accurate.
- **Use of equitable sharing resources** to determine if equitable sharing cash and property were used for allowable law enforcement purposes.
- **Compliance with audit requirements** to ensure the accuracy, consistency, and uniformity of audited equitable sharing data.

See Appendix 1 for more information on our objective, scope, and methodology.

AUDIT RESULTS

Accounting for Equitably Shared Resources

Equitable sharing guidelines require that law enforcement agencies use standard accounting procedures and internal controls to track DOJ Equitable Sharing Program receipts. In addition, law enforcement agencies participating in the Equitable Sharing Program are required to use the eShare Portal.⁴ Based upon our review of documentation and interviews with the auditee, we did not identify weaknesses in the MSP Airport PD's accounting for DOJ equitably shared funds.

Receipts

Between January 1, 2016, and December 31, 2018, the MSP Airport PD received DOJ equitable sharing revenues totaling \$800,080 to support law enforcement operations. We confirmed that these receipts were deposited into the MSP Airport PD's general bank account and that each receipt was properly recorded to the accounting codes designated for DOJ Equitable Sharing Program activities. We found that the MSP Airport PD received all of the receipts during this time via electronic funds transfer from the USMS's eShare Portal, and we confirmed that these deposits were timely.⁵

During our review of the DOJ equitable sharing receipts, we did not identify other revenues being recorded to the accounting codes established for DOJ Equitable Sharing Program activities. As a result, the MSP Airport PD was in compliance with the DOJ equitable sharing guidance on properly accounting for DOJ equitable sharing receipts.

Interest Income

We reviewed the accounting records for the MSP Airport PD and determined that there was interest earned on DOJ equitable sharing receipts. The Metropolitan Airport Commission Finance Department officials told us that the accounting codes established solely for the DOJ equitable sharing funds are also used to record the interest earned on DOJ equitable sharing receipts. Therefore, in order to verify that the interest earned on equitably shared funds was properly handled, we compared the interest noted on the ESAC reports for FYs 2016, 2017, and 2018 to the MSP Airport PD's accounting records. We found that the interest receipts reported on the ESAC matched the amount recorded in the accounting records. Therefore, the MSP Airport PD was in compliance with DOJ equitable sharing guidance on properly accounting for interest income earned on DOJ equitable sharing funds.

⁴ The eShare Portal is a web-based tool that enables a participating agency to view the status of its pending equitable sharing requests and run reports on disbursed equitable sharing funds, as well as to submit their ESAC reports. The eShare portal is also the mechanism used to process electronic payments. Use of the eShare Portal for these equitable sharing activities is mandatory.

⁵ eShare notification is the process of electronic payment from the USMS. Participation in the process is mandatory.

Other Income

During our review of the MSP Airport PD's financial records, we determined that the MSP Airport PD earned "other income" during the scope of our audit. Specifically, the MSP Airport PD recorded other income in the amount of \$6,671 in FY 2016 and \$5,717 in FY 2017. Officials from the Metropolitan Airport Commission Finance Department and the MSP Airport PD said that the other income was a combination of vendor rebates and refunds for equipment purchased for the MSP Airport PD. We verified the transactions and determined that the amounts recorded as other income in the accounting records were accurate and correct. We discuss other income further in the Equitable Sharing Agreement and Certification Reports section below.

Expenditures

As with receipts, the MSP Airport PD uses a dedicated set of accounting codes for recording DOJ equitable sharing expenditures. We confirmed that the MSP Airport PD only recorded authorized expenses to the accounting codes established for DOJ Equitable Sharing Program activities. As a result, the MSP Airport PD was in compliance with the DOJ equitable sharing guidance on properly accounting for DOJ equitable sharing expenditures. We also tested expenditures by selecting categories based upon dollar amounts expended and uniqueness of transactions to verify that the MSP Airport PD had properly recorded the transactions in the accounting records and maintained adequate supporting documentation for those transactions. The results of the expenditure transaction testing is discussed in the Use of Equitable Sharing Resources section of this report.

Internal Control Environment

We used observations, discussions, and analysis to gain an understanding of the MSP Airport PD's internal control environment. During our discussions with MSP Airport PD and the Metropolitan Airport Commission, we inquired if they had any policies or procedures regarding administering the DOJ Equitable Sharing Program. In response to that inquiry, the MSP Airport PD provided copies of its policies and procedures for administering the program. We reviewed the policies and procedures and believe the contents generally provide the necessary framework to adequately manage DOJ equitable sharing funds. However, we noted that the MSP Airport PD did not always adhere to its records retention schedule. We discuss this issue further in the Use of Equitable Sharing Resources section below.

Equitable Sharing Agreement and Certification Reports

Law enforcement agencies that participate in the Equitable Sharing Program are required to submit annual ESAC reports within 60 days after the end of an agency's fiscal year. This must be accomplished regardless of whether equitable sharing funds were received or maintained that year. Additionally, the head of the law enforcement agency and a designated official of the local governing body must sign the ESAC report. By signing and submitting the ESAC report, the signatories

agree to be bound by and comply with the statutes and guidelines that regulate the DOJ Equitable Sharing Program.

Accuracy of ESAC Reports

To verify the accuracy of the annual ESAC reports, we compared the total expenditures reported on the MSP Airport PD's three most recent ESAC reports to the total expenditures reflected in the MSP Airport PD's accounting records for FYs 2016, 2017, and 2018. We did not identify any inaccuracies during our testing, as shown in the table below.

ESAC Expenditures and Accounting Records Comparison

Fiscal Year	Expenditures According to ESAC Report	Expenditures According to Accounting Records	Difference
2018	\$155,916	\$155,916	\$0
2017	\$154,737	\$154,737	\$0
2016	\$219,617	\$219,617	\$0

Source: OIG analysis of MSP Airport PD ESAC reports and accounting records

We also reviewed the section of the ESAC reports that summarize the equitable sharing monies spent by specific category, such as training and education, law enforcement equipment, and contracting for services. To do so, we reviewed the MSP Airport PD's accounting records, along with supporting documentation for the expenditures, and compared the results to the amounts reflected on the ESAC reports. We found that the category totals reflected on the ESAC reports matched the documentation we reviewed.

Completeness and Timeliness of ESAC Reports

We tested the MSP Airport PD's compliance with ESAC reporting requirements to determine if its reports were complete and submitted in a timely manner. We found that all reports for FYs 2016, 2017, and 2018 were complete, approved, and submitted within the 60-day required timeframe.

Use of Equitable Sharing Resources

Guidance governing the Equitable Sharing Program requires that equitable sharing funds or tangible property received by state and local agencies be used for law enforcement purposes that directly supplement the appropriated resources of the recipient law enforcement agency. Also, participating agencies must use the funds prudently to avoid any appearance of extravagance, waste, or impropriety. During FYs 2016, 2017, and 2018, the MSP Airport PD did not receive any forfeited tangible property.

Use of Equitable Sharing Funds

According to its accounting records, the MSP Airport PD expended DOJ equitable sharing funds totaling \$530,269 for FYs 2016, 2017, and 2018. To

determine if the expenditures of DOJ equitable sharing funds were allowable and supported by adequate documentation, we judgmentally selected and tested 54 transactions totaling \$450,270, or 87 percent of the total expenditures. We found that all sampled expenditures were allowable, properly posted to the accounting records, and supported by adequate documentation.

However, during our verification of expenditures, we found that the MSP Airport PD did not always maintain complete supporting documentation for expenditures paid for with DOJ equitable sharing funds. Specifically, the MSP Airport PD could not readily provide us with independent verification, such as certificates of completion, for police officer attendance at several training events paid for with equitable sharing funds. In order to provide us acceptable support for these expenditures, the MSP Airport PD had to request training verification from the training vendors and then provide this documentation to us. When we asked about record retention procedures, officials from both the Metropolitan Airport Commission and the MSP Airport PD confirmed that they were not aware of the need to maintain training certificates and other documentation.

According to equitable sharing guidelines, state and local law enforcement agencies shall retain for a period of at least 5 years all documents and records pertaining to their participation in the DOJ Equitable Sharing Program and their receipt and expenditures or use of shared cash, proceeds, real property, or tangible personal property, including but not limited to forms, accounting and bookkeeping documents, logs and records, bank records and statements, and audit reports. Additionally, the MSP Airport PD has a Records Retention Schedule that requires the PD to retain an employee's training records for a period of 6 years after that person's employment ends. Therefore, despite both federal and MSP Airport PD policy requiring that these records be maintained, the MSP Airport PD was not maintaining them. We thus recommend that the DOJ Criminal Division reiterate to the MSP Airport PD the importance of following its internal record retention policies, adhering to the equitable sharing guidelines, and retaining all necessary Equitable Sharing Program activity documentation.

Supplanting

Equitable sharing guidelines require that shared resources be used to increase or supplement the resources of the recipient agency and prohibits the use of shared resources to replace or supplant the appropriated resources of the recipient. In other words, the recipient agency must benefit directly from the equitable sharing funds. To test whether equitable sharing funds were used to supplement rather than supplant local funding, we interviewed local officials and reviewed the total budgets for the Metropolitan Airport Commission and, specifically, the MSP Airport PD for FYs 2013 through 2018.

We determined that both the MSP Airport PD and Metropolitan Airport Commission's budgets increased from one fiscal year to the next from FY 2013 to FY 2018. Because both budgets increased, we determined that there was a low risk that the Metropolitan Airport Commission was supplanting its budget with equitable

sharing funds during our period of review. Moreover, our testing of the sampled expenditure transactions did not reveal any evidence of supplanting.

Compliance with Audit Requirements

Equitable sharing guidelines require that state and local law enforcement agencies that receive equitable sharing cash, proceeds, or tangible property comply with the Single Audit Act Amendments of 1996 and 2 C.F.R. 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance). The Single Audit Act provides for recipients of federal funding above a certain threshold to receive an annual audit of their financial statements and federal expenditures. The Single Audit Report is required to include a Schedule of Expenditures of Federal Awards for the period covered by the auditee's financial statements. In addition, an entity must submit its Single Audit Report no later than 9 months after the end of the fiscal year covered by the audit.

We reviewed the Metropolitan Airport Commission's Single Audit Reports for FYs 2016 and 2017, and we determined that both reports were submitted on time and neither contained any findings regarding the MSP Airport PD's financial statements or federal awards.⁶

⁶ The FY 2018 Single Audit Report was not yet due at the time of our review.

CONCLUSION AND RECOMMENDATION

We tested the MSP Airport PD's compliance with what we considered to be the most important conditions of the DOJ Equitable Sharing Program to assess whether the MSP Airport PD accounted for equitable sharing funds properly and used such revenues for allowable purposes. We found that the MSP Airport PD generally complied with the requirements of the DOJ Equitable Sharing Program. We found that the MSP Airport PD properly accounted for all receipts and expenditures and submitted accurate ESACs in a timely manner. We also determined that the sample of DOJ equitable sharing fund expenditures we reviewed were all for allowable purposes. Finally, while the MSP Airport PD has written procedures for managing its DOJ equitable sharing activities, we found that the MSP Airport PD did not always adhere to its established records retention schedule.

We recommend that the Criminal Division:

1. Reiterate to the MSP Airport PD the importance of maintaining Equitable Sharing Program activity documentation, including records for all training paid for with equitable sharing funds, in accordance with both DOJ Equitable Sharing Program guidelines and the MSP Airport PD's own record retention schedule.

OBJECTIVE, SCOPE, AND METHODOLOGY

Objective

The objective of the audit was to assess whether the Minneapolis Saint-Paul International Airport Police Department (MSP Airport PD) accounted for equitable sharing funds properly and used such revenues for allowable purposes defined by applicable guidelines.

Scope and Methodology

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 and 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, equitable sharing receipts received by the MSP Airport PD between January 1, 2016, and December 31, 2018. Our audit was limited to equitable sharing revenues received through the DOJ Equitable Sharing Program. We tested compliance with what we considered to be the most important conditions of the DOJ Equitable Sharing Program. We reviewed laws, regulations, and guidelines governing the accounting for and use of DOJ equitable sharing receipts, including the Guide to Equitable Sharing for State and Local Law Enforcement Agencies, issued by the Criminal Division's Money Laundering and Asset Recovery Section (MLARS) in April 2009; the Interim Policy Guidance Regarding the Use of Equitable Sharing Funds, issued by MLARS in July 2014; and the Guide to Equitable Sharing for State, Local, and Tribal Law Enforcement Agencies, issued by MLARS in July 2018. Unless otherwise stated in our report, the criteria we audited against are contained in these documents.

We performed audit work at the MSP Airport PD's headquarters located in the Minneapolis-Saint Paul Airport in Minneapolis, Minnesota. We interviewed MSP Airport PD and Metropolitan Airport Commission officials and examined records, related revenues, and expenditures of DOJ's equitable sharing funds. In addition, we relied on computer-generated data contained in the DOJ Consolidated Asset Tracking System (CATS) to identify equitably shared revenues awarded to the MSP Airport PD during the audit period. We did not establish the reliability of the data contained in CATS as a whole. However, when viewed in context with other available evidence, we believe the opinions, conclusions, and recommendation included in this report are valid.

Our audit specifically evaluated the MSP Airport PD's compliance with three essential equitable sharing guidelines: (1) Equitable Sharing Agreement and Certification reports, (2) accounting for equitable sharing receipts, and (3) the use of equitable sharing funds. In planning and performing our audit, we considered

internal controls over DOJ equitable sharing receipts established and used by the MSP Airport PD. However, we did not assess the reliability of the Metropolitan Airport Commission financial management system, or the extent to which the financial management system complied with internal controls, laws, and regulations overall.

In the scope of this audit, the MSP Airport PD had 86 cash receipts totaling \$800,080. In the same period, the MSP Airport PD had 132 expenditures totaling \$530,269. We reviewed the top 5 receipts for the audit scope totaling \$226,614, and we reviewed a judgmental sample of 54 expenditures totaling \$450,270. A judgmental sampling design was applied to capture numerous aspects of the disbursements reviewed, such as dollar amounts and expenditure categories. This non-statistical sample design does not allow projection of the test results to all disbursements.

Our audit included an evaluation of the MSP Airport PD's most recent annual audits. The results of these audits were reported in the Single Audit Reports that accompanied the MSP Airport PD's basic financial statements for FYs 2016 and 2017. The Single Audit Reports were prepared under the provisions of 2 C.F.R. 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. We reviewed the independent auditors' assessments, which disclosed no internal control weaknesses or significant noncompliance issues related to the DOJ Equitable Sharing Program.

We discussed the results of our review with officials from the MSP Airport PD and the Metropolitan Airport Commission throughout the audit and at a formal exit conference. As appropriate, their input has been included in the relevant sections of the report.

**MINNEAPOLIS-SAINT PAUL
INTERNATIONAL AIRPORT POLICE DEPARTMENT'S
RESPONSE TO THE DRAFT AUDIT REPORT**



Minneapolis-St. Paul International Airport Police Department

June 27, 2019

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

Dear Ms. Taraszka:

The Minneapolis-Saint Paul International Airport Police Department (MSP Airport PD) is in receipt of the Inspector General's (OIG) Draft Report and recommendation as a result of the recently completed audit of our Equitable Sharing Program for the period of January 1, 2016 through December 31, 2018. Please accept this letter as our Official Response to the draft audit report.

Recommendation

Ensure the MSP Airport PD maintain equitable sharing program activity documentation including records for all training paid for with equitable sharing funds, in accordance with both DOJ Equitable Sharing guidelines and the MSP Airport PD's own Record Retention Schedule.

Response

The MSP Airport Police Department training division will now ensure that records, such as training certificates, and signed class rosters, related to training paid for with equitable sharing funds will be maintained in accordance to DOJ guidelines, and our records retention schedule.

If you have any questions regarding our response, please let me know.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mike Everson".

Mike Everson
Public Safety Director / Chief of Police
Minneapolis-Saint Paul International Airport Police

THE CRIMINAL DIVISION'S RESPONSE
TO THE DRAFT AUDIT REPORT



U.S. Department of Justice

Criminal Division

Money Laundering and Asset Recovery Section

Washington, D.C. 20530

JUL 11 2019

MEMORANDUM

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

FROM: Jennifer Bickford, Deputy Chief
Program Management and Training Unit
Money Laundering and Asset
Recovery Section *Jennifer Bickford*

SUBJECT: DRAFT AUDIT REPORT for the Minneapolis-Saint Paul International
Airport Police Department's Equitable Sharing Program Activities

In a memorandum dated June 21, 2019, your office provided a draft audit report for the Minnesota-Saint Paul International Airport Police Department (MSP Airport PD), which included actions necessary for closure of the audit report findings. The Money Laundering and Asset Recovery Section (MLARS) concurs with all findings and recommendations in the draft audit report.

Upon receipt of the final audit report, MLARS will work with MSP Airport PD to correct all identified findings.

cc: Denise Turcotte, Audit Liaison
U.S. Department of Justice
Criminal Division

Louise Duhamel
Acting Assistant Director, Audit Liaison Group
Internal Revenue and Evaluation Office
Justice Management Division

Ashley Hines, Audit Liaison
Audit Liaison Group
Internal Revenue and Evaluation Office
Justice Management Division

**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 Minneapolis-Saint Paul International Airport Police Department (MSP Airport PD) and the U.S. Department of Justice Criminal Division for review and official comment. The Criminal Division's response is included in Appendix 3 and the MSP Airport PD response is incorporated in Appendix 2 of this final report. In response to our draft audit report, the Criminal Division concurred with our recommendation. As a result, the audit report is resolved. The following provides the OIG analysis of the responses and summary of actions necessary to close the report.

Recommendation for the Criminal Division:

- 1. Reiterate to the MSP Airport PD the importance of maintaining Equitable Sharing Program activity documentation, including records for all training paid for with equitable sharing funds, in accordance with both DOJ Equitable Sharing Program guidelines and the MSP Airport PD's own record retention schedule.**

Resolved. The Criminal Division concurred with our recommendation and stated that it will work with the MSP Airport PD to correct all identified findings.

The MSP Airport PD stated that its training division will now ensure that records, such as training certificates and signed class rosters related to training paid for with equitable sharing funds, will be maintained in accordance with DOJ guidelines and the MSP Airport PD records retention schedule.

Given the MSP Airport PD's statement that it has taken corrective action to retain records according to both DOJ guidelines and its policy, this recommendation can be closed when we receive evidence that the Criminal Division has verified the MSP Airport PD's demonstration of actions taken to ensure such compliance, including for records of all training paid for with equitable sharing funds.



The Department of Justice Office of the Inspector General (DOJ OIG) is a statutorily created independent entity whose mission is to detect and deter waste, fraud, abuse, and misconduct in the Department of Justice, and to promote economy and efficiency in the Department's operations.

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U.S. DEPARTMENT OF JUSTICE OFFICE OF THE INSPECTOR GENERAL

950 Pennsylvania Avenue, Northwest
Suite 4706
Washington, DC 20530 0001

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