

OFFICE OF AUDITS & ADVISORY SERVICES



BODY WORN CAMERAS

FINAL REPORT

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Audit Manager: [Lynne Prizzia, CISA, CRISC](#)
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County of San Diego

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AUDITOR AND CONTROLLER

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JUAN R. PEREZ
CHIEF OF AUDITS

December 2, 2020

TO: William D. Gore, Sheriff
Office of the Sheriff

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: BODY WORN CAMERAS AUDIT

Enclosed is our report on the Body Worn Cameras Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board of Supervisors Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. You or your designee will receive email notifications when these quarterly updates are due, and these notifications will continue until all actions have been implemented.

If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:CJE:nb

Enclosure

c: Holly Porter, Deputy Chief Administrative Officer, Public Safety Group
Tracy Drager, Auditor and Controller
Rosemarie Degracia, Group Finance Director, Public Safety Group

INTRODUCTION

Audit Objective The Office of Audits & Advisory Services (OAAS) completed an audit of the San Diego County Sheriff's Department (SDSO) use of Body Worn Cameras (BWC). The objective of the audit was to evaluate policies, procedures, and protocols for the use of BWC, and controls in place regarding storage, access, integrity, security, and retention of video files.

Background A body worn camera, also known as body cameras or wearable cameras, is a wearable audio, video, or photographic recording system. BWC have a range of uses and designs, of which the best-known use is as a part of policing equipment. Wearable cameras are used by law enforcement organizations in countries around the world. The cameras are intended to improve interactions between officers and the public and to increase transparency and accountability.

The SDSO authorizes the use of BWC technology by Deputy Sheriffs (deputies) and Community Services Officers (officers) with the goal of providing an additional layer of documentation for events, actions, conditions and statements made during critical incidents, and to improve reports, collection of evidence, and testimony in court.

The SDSO has a total of 1,462 BWCs assigned to deputies, and a pool of 212 BWCs to be used as replacements for defective and/or broken units. The vendor known as Axon provides the Sheriff with BWC, training and manuals to facilitate better understanding and use of the equipment. The SDSO also utilizes the Axon Commander 4.5 application, which is an evidence management system used to store, search, and manage digital evidence such as BWC videos.

Deputies are assigned BWCs and use them during interactions with the public. BWCs are then returned to the station after the deputy's shift has ended in order for the BWC video to be uploaded using the Evidence Transfer System (ETS). The ETS uploads the encrypted BWC footage to a secure server in the SDSO data center. The SDSO has retained all BWC videos recorded since the program began, but is developing a retention policy to define when BWC videos can be disposed of.

Deputies have certain rules they abide by during the use of BWCs, and those rules are documented in the SDSO Policies and Procedures Manual including keeping BWCs powered on, and the record mode activated prior to contact with citizens. Deputies are able to view the BWC videos, but are not able to alter or delete videos. Digital management responsibilities reside with the SDSO's Video Analysis Unit (VAU). The VAU is comprised of a few individuals that coordinate data redaction and deletion of BWC videos in the event of an accidental recording. Additionally, they manage access to BWC videos, and provide copies when requested for legal purposes.

Audit Scope & Limitations

The audit included an evaluation of current policies, procedures, and protocols for the use of BWC, and controls in place regarding storage, access, integrity, security, and retention of video files.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.

Methodology

OAAS performed the audit using the following methods:

- Interviewed key SDSO personnel on policies, procedures, and processes relevant to BWC;
- Examined policies and procedures related to BWC and mapped key processes to obtain an understanding of BWC controls and management of BWC equipment;
- Researched and reviewed federal, state, and local laws and best practices related to BWC;
- On a sample basis, conducted testing on the following areas:
 - Maintaining BWC Recordings;
 - Verifying Compliance with BWC Video Categorization;
 - Docking and Review of BWC Videos;
 - BWC Inventory Asset Management;
 - BWC Access Provisioning, Appropriateness, and De-provisioning.

AUDIT RESULTS

Summary

Within the scope of the audit, OAAS determined that the SDSO has developed and implemented policies, procedures, and protocols for the use of BWCs, and controls regarding storage, access, integrity, security, and retention of video files. However, opportunities exist to improve upon existing policies and procedures and enhance the efficiency and effectiveness of the Sheriff BWC operations.

Finding I:**Unclear Procedures**

During the BWC policies and procedures testing, we noted the following regarding Policy 45, Body Worn Camera, Patrol Procedures Manual:

- Page 116, Downloading/Storage Procedures, states that deputies shall place BWCs into a slot on the Evidence Transfer System at the end of their shift. This is inconsistent with the Storage section on page 114, which describes exceptions for certain deputies (traffic, rural, and deputies subject to call-outs). This discrepancy makes the procedures unclear.

- Page 117, Supplemental Documentation, Injuries, Scene Documentation, and Transportation of Arrestee states that BWCs “may” be used in these circumstances. Since the use of BWCs is not a requirement and left at the discretion of the deputy, it can lead to inconsistent practices. Additionally, it is not in alignment with the stated goal of the BWC system, which is to provide an additional layer of documentation for events, actions, conditions and statements made during critical incidents and to improve reports, collection of evidence, and testimony in court.

According to the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework, control activities are the policies and procedures that help ensure management directives are carried out. They must be implemented thoughtfully, conscientiously, and consistently. A procedure will not be useful if performed mechanically without a sharp continuing focus on conditions to which the policy is directed. The COSO framework includes a monitoring component and specifies that some level of documentation is necessary for assurance that each of the COSO framework components and relevant principles is present and functioning.

Recommendation: The SDSO should review and update policies and procedures to address the two issues noted above and provide training to deputies to ensure changes are properly communicated and implemented.

Finding II: BWC Procedures are Not Applied Consistently

We reviewed the BWC policies and procedures and conducted testing to assess their effectiveness and determine whether deputies apply them consistently. We noted the following:

Deputies Not Docking BWCs at End of Shift

Deputies are not docking BWCs promptly at the end of their shifts as required by SDSO policy. Our testing results showed that:

- Out of 15 sampled deputies and 42 BWC videos tested, 8 videos (19%) belonging to 5 deputies (33% of sampled deputies) were ingested into the Commander system more than 24 hours after the deputy's shift ended.

It was determined that this was due to different factors. For deputies that work in rural communities, it appeared to be due to scheduling challenges for deputies working further away from a Sheriff's station. Traveling back to the station after every shift may create too much of a burden for deputies and thus would be an issue for them to do so each time. For deputies working in non-rural communities, it appeared to be a combination of human error, training, and lack of oversight.

According to SDSO Patrol Procedures Manual, Policy 45, Body Worn Camera, under Downloading/Storage Procedures, "After verifying the required metadata has been added to all recorded events, deputies shall place the BWC into a slot on the Evidence Transfer System at the end of their shift."

Deputies Not Recording Entire Interactions with Citizens

We tested a sample of 30 traffic stop events to verify whether deputies are recording entire interactions with citizens and we found that:

- A BWC video did not exist for 2 of the 30 sampled traffic stop events (7%).
- Deputies started recording the BWC video after initial contact with the citizen was made in 3 of the 30 sampled traffic stop events (10%).

The Sheriff's Policy and Procedure Manual Section 6.131 Body Worn Cameras, General states, "The body-worn cameras shall be worn or used by uniformed personnel at all times during on duty hours in a law enforcement capacity, unless directed by a supervisor." Additionally, under Enforcement Related Contacts, it states, "The record mode of the camera should be activated prior to actual contact with a citizen (victim/witness/suspect), or as soon as safely possible, and continue recording until the contact is completed."

Deputies BWCs Not Powered On

Based on the same sample of 30 traffic stop events, we determined that deputies are not always keeping their BWCs powered on and in stand-by mode. We found that 3 of the 30 sampled traffic stop events (10%) did not have a 30 second buffer in the BWC recorded video prior to initial contact with the public.

The SDSO Policy and Procedure Manual Section 6.131 Body Worn Cameras, General states, "The record mode of the camera should be activated prior to actual contact with a citizen (victim/witness/suspect), or as soon as safely possible, and continue recording until the contact is completed."

The risk of losing critical evidence increases if BWCs are not docked promptly as BWCs could be unintentionally lost, damaged, or stolen if not docked at the end of the shift. Similarly, the risk of missing or losing potential key evidence that could be used in legal proceedings significantly increases when deputies do not keep BWCs powered on and when entire law enforcement related contacts or interactions with the public are not recorded.

Recommendation: The SDSO should consider the following:

1. Determine if any changes to existing Policy and Procedure Manual are needed to the existing provision that all BWCs be docked at end of shift.
2. To ensure compliance with policies, the Sheriff should conduct training when BWC policy or procedures change, and establish or enhance its oversight process to monitor compliance with BWC policies and procedures.

Finding III: Commander System Access Not Always Updated/Removed When Users Change Job Roles

We found that user access to the Commander system is not always updated/removed when a user changes job roles. Specifically, we noted:

- Out of the 20 users sampled for testing, two users with access to the Commander system had changed job roles and no longer needed access. Additionally, one user was mistakenly given access due to having the same name as another user.
- Commander system user accounts are not validated at least annually.

There is currently no process to update/remove Commander system access when a user changes job roles. Additionally, periodic reviews of the Commander system access are not being performed.

The SDSO stated that although three of the users on the Commander access list were errors, if they had accessed the Commander system, they would be in violation of the Sheriff policies and procedures. Additionally, none of the access levels assigned to those three users would allow them to delete or modify videos. According to Criminal Justice Information Services (CJIS) Security Policy 5.5.1 Account Management, the agency shall manage information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The agency shall validate information system accounts at least annually and shall document the validation process.

Recommendation: To comply with CJIS Security Policy 5.5.1 Account Management, the SDSO should validate Commander user accounts at least annually and establish procedures to update/remove access when users change job roles.

Finding IV: Commander User Accounts Not Removed Timely

We identified 31 out of 1,592 Commander users (2%) that were no longer with the SDSO and should have had their Commander accounts removed.

The SDSO stated that the Data Services Division sets the separated workers access to the Sheriff's Department server to expire on the date of separation. When this occurs, the subject no longer has access to log on to the department server or Commander.

According to CJIS Security Policy 5.5.1 Account Management, the agency shall manage information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The agency shall validate information system accounts at least annually and shall document the validation process.

Recommendation: The SDSO should establish procedures for removing accounts on the Commander system timely when workers separate from the Sheriff or the County.

Finding V: BWCs Inventory Tracking Insufficient

The SDSO maintains a list of BWCs to track assigned units (Camera Assignments list), but it does not have a comprehensive inventory list to track all units purchased, including unassigned units. We noted that 6 out of 30 sampled BWCs from the BWC purchase inventory list were not found in the BWC Camera Assignment listing.

The SDSO does not have a process in place to track unassigned BWCs, which may prevent the SDSO from detecting and preventing theft and/or loss of BWCs.

According to the County of San Diego Administrative Manual 0050-02-01, page 5, department heads are required to maintain listings of minor equipment items for which they are responsible for, adding new items as they are received and deleting items that are disposed of or no longer in use.

Recommendation: The SDSO should develop a procedure to track and document BWCs assigned and in storage to ensure the accuracy of inventory records.

Office of Audits & Advisory Services

Compliance **R**eliability **E**ffectiveness **A**ccountability **T**ransparency **E**fficiency

VALUE

DEPARTMENT'S RESPONSE
(OFFICE OF THE SHERIFF)



COUNTY OF SAN DIEGO

INTER-DEPARTMENTAL CORRESPONDENCE

October 16, 2020

RECEIVED

OCT 21 2020

TO: Juan R. Perez, Chief of Audits (O-305)
Auditor and Controller's Office

OFFICE OF AUDITS &
ADVISORY SERVICES

FROM: William D. Gore, Sheriff (O-41)

**San Diego County Sheriff's Department Response to County of San Diego Office of Audits
& Advisory Services: Body Worn Cameras Audit Recommendations - Report No. A20-016**

I appreciate the opportunity to respond to your recent audit. I am committed to embracing best practices in all the work associated with keeping San Diego County safe and secure. Please accept this letter as our response to your recently completed audit. I have included your findings and rationale verbatim in *italicized* writing below with my response to each finding immediately following.

OAAS Finding I: Unclear Procedures

During the BWC policies and procedures testing, we noted the following regarding Policy 45, Body Worn Camera, Patrol Procedures Manual:

- *Page 116, Downloading/Storage Procedures, states that deputies shall place BWCs into a slot on the Evidence Transfer System at the end of their shift. This is inconsistent with the Storage section on page 114, which describes exceptions for certain deputies (traffic, rural, and deputies subject to call-outs). This discrepancy makes the procedures unclear.*
- *Page 117, Supplemental Documentation, Injuries, Scene Documentation, and Transportation of Arrestee states that BWCs "may" be used in these circumstances. Since the use of BWCs is not a requirement and left at the discretion of the deputy, it can lead to inconsistent practices. Additionally, it is not in alignment with the stated goal of the BWC system, which is to provide an additional layer of documentation for events, actions, conditions and statements made during critical incidents and to improve reports, collection of evidence, and testimony in court.*

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OAAS Recommendation: *The SDSO should review and update policies and procedures to address the two issues noted above and provide training to deputies to ensure changes are properly communicated and implemented.*

Sheriff's Action Plan: We have reviewed both instances the report cited related to unclear policies and procedures and agree in part with the OAAS recommendation.

Regarding the first portion of the finding related to the language for the docking of the Body Worn Cameras (BWC's), effective September 21, 2020, we have placed the Field

Operations Manual (FOM) [formerly titled Patrol Procedures Manual] Policy 45 *Body Worn Camera* under review. The language related to Section K *Downloading/Storage Procedures* will potentially be revised to the following:

After verifying the required metadata has been added to all recorded events, deputies shall place the BWC into the slot on the Evidence Transfer System at the end of their shift. The only exception is deputies who did not return to the station at the end of their shift, or any deputy with approval of their supervisor. In these instances, the deputy is required to place the BWC into the slot on the Evidence Transfer System upon returning to their station, but in no case more than seven (7) days later unless approved in writing by a supervisor.

Planned Completion Date: January 1, 2021

Contact Information for Implementation:

Aaron Meleen, Sergeant
Division of Inspectional Services

Regarding the second portion of the finding related to the *Supplemental Documentation, Injuries, Scene Documentation, and Transportation of Arrestee*, the Sheriff's Department disagrees with the recommendation that would require mandatory use of the BWC in all such circumstances. Neither the Department Policies and Procedures Manual, nor the FOM can encompass all possible situations encountered in the discharge of police duties. Additionally, as stated in the FOM, digital evidence captured by the BWC has limitations and is not all inclusive. Because of these limitations, it is appropriate to allow the deputies discretion to determine when the use of the BWC is beneficial to supplement other approved methods for documenting case information. As currently written, the FOM provides appropriate guidance and examples of when deputies may consider recording with the BWC to supplement their investigations. It is our belief Section M *Supplemental Documentation* is worded appropriately and adheres to the Department's stated goals related to the use of BWCs.

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OAAS Finding II: BWC Procedures are Not Applied Consistently

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It was determined that this was due to different factors. For deputies that work in rural communities, it appeared to be due to scheduling challenges for deputies working further away from a Sheriff's station. Traveling back to the station after every shift may create too much of a burden for deputies and thus would be an issue for them to do so each time. For deputies working in non-rural communities, it appeared to be a combination of human error, training, and lack of oversight.

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Enforcement Related Contacts, it states, "The record mode of the camera should be activated prior to actual contact with a citizen (victim/witness/suspect), or as soon as safely possible, and continue recording until the contact is completed."

Deputies BWCs Not Powered On

Based on the same sample of 30 traffic stop events, we determined that deputies are not always keeping their BWCs powered on and in stand-by mode. We found that 3 of the 30 sampled traffic stop events (10%) did not have a 30 second buffer in the BWC recorded video prior to initial contact with the public.

The SDSO Policy and Procedure Manual Section 6.131 Body Worn Cameras, General states, "The record mode of the camera should be activated prior to actual contact with a citizen

(victim/witness/suspect), or as soon as safely possible, and continue recording until the contact is completed."

The risk of losing critical evidence increases if BWCs are not docked promptly as BWCs could be unintentionally lost, damaged, or stolen if not docked at the end of the shift. Similarly, the risk of missing or losing potential key evidence that could be used in legal proceedings significantly increases when deputies do not keep BWCs powered on and when entire law enforcement related contacts or interactions with the public are not recorded.

OAAS Recommendation: *The SDSO should consider the following:*

- 1. Determine if any changes to existing Policy and Procedure Manual are needed to the existing provision that all BWCs be docked at end of shift.*
- 2. To ensure compliance with policies, the Sheriff should conduct training when BWC policy or procedures change, and establish or enhance its oversight process to monitor compliance with BWC policies and procedures.*

Sheriff's Action Plan: We have reviewed Finding II and agree with the OAAS recommendations.

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We have reviewed the instances in the audit report where the auditor found deputies did not adhere to the stated policy of docking their BWCs at the end of their shift. The auditors recognized the current procedure may not be feasible for deputies working in the rural areas of the Sheriff's jurisdiction. As stated in our Action Plan for the OAAS's recommendations for Finding I, the FOM will be revised to address the docking procedure for rural deputies to allow for consistent compliance with the policy.

The audit report identified the additional policy compliance concerns of deputies assigned to urban stations not docking BWCs at the end of a shift, deputies not recording entire interactions with citizens, and deputies' BWCs not being powered on and in standby/buffering mode prior to record activation. To address these concerns, we will be disseminating a letter from our Law Enforcement Services Bureau to all deputies regarding the importance of complying with BWC policies and procedures. They will be reminded of the requirements to dock their BWC's in a timely manner, record their entire contact with citizens when appropriate, and ensure their BWC's are in buffering mode when leaving the station. Additionally, each station will have signs posted at exits of the stations to remind deputies to place their BWC in standby/buffering mode. Supervisors will be directed to discuss the BWC policy and reinforce the expectation of complying with the policy during team meetings.

On September 21, 2020, we placed the Department Policy and Procedure Manual section 6.131 *Body Worn Cameras* under review to determine whether policy revisions could mitigate the compliance concerns identified by the auditors. During the initial review the Department determined more directive language was needed to address the issues of deputies not recording entire interactions with citizens, and deputies' BWCs not being powered on and in standby/buffering mode prior to activating the record mode. The recommended language is as follows:

Enforcement Related Contacts: When responding to a call for service, a deputy shall activate their BWC in record mode prior to arriving on scene or upon arrival and prior to exiting their patrol vehicle. Deputies should also begin recording prior to initiating any law enforcement related contact.

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The auditors also identified the issue of ineffective oversight to ensure compliance with policies and procedures. To enhance oversight and assess the level of policy and procedure compliance, patrol and traffic sergeants will be directed to regularly spot check their staff's BWC videos. The Division of Inspectional Services will provide guidance to supervisors regarding the performance anchors to monitor and the process for conducting these spot checks. Additionally, the Division of Inspectional Services will conduct an annual BWC review and will provide a written report to the Office of the Sheriff.

Planned Completion Date: January 1, 2021

Contact Information for Implementation:

Aaron Meleen, Sergeant
Division of Inspectional Services

Finding III: Commander System Access Not Always Updated/Removed When Users Change Job Roles

We found that user access to the Commander system is not always updated/removed when a user changes job roles. Specifically, we noted:

- *Out of the 20 users sampled for testing, two users with access to the Commander system had changed job roles and no longer needed access. Additionally, one user was mistakenly given access due to having the same name as another user.*
- *Commander system user accounts are not validated at least annually.*

There is currently no process to update/remove Commander system access when a user changes job roles. Additionally, periodic reviews of the Commander system access are not being performed.

The SDSA stated that although three of the users on the Commander access list were errors, if they had accessed the Commander system, they would be in violation of the Sheriff policies and procedures. Additionally, none of the access levels assigned to those three users would allow them to delete or modify videos. According to Criminal Justice Information Services (CJIS) Security Policy 5.5.1 Account Management, the agency shall manage information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The agency shall validate information system accounts at least annually and shall document the validation process.

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OAAS Recommendation: *To comply with CJIS Security Policy 5.5.1 Account Management, the SDSO should validate Commander user accounts at least annually and establish procedures to update/remove access when users change job roles.*

Sheriff's Action Plan: We have reviewed Finding III and agree with the OAAS recommendations.

Our Video Analysis Unit (VAU) will conduct a yearly audit of the Commander users and their roles within Commander to ensure users are assigned the correct access level, or access is removed as appropriate.

Planned Completion Date: January 1, 2021

Contact Information for Implementation:

Aaron Meleen, Sergeant
Division of Inspectional Services

Finding IV: Commander User Accounts Not Removed Timely

We identified 31 out of 1,592 Commander users (2%) that were no longer with the SDSO and should have had their Commander accounts removed.

The SDSO stated that the Data Services Division sets the separated workers access to the Sheriff's Department server to expire on the date of separation. When this occurs, the subject no longer has access to log on to the department server or Commander.

According to CJIS Security Policy 5.5.1 Account Management, the agency shall manage information system accounts, including establishing, activating, modifying, reviewing, disabling, and removing accounts. The agency shall validate information system accounts at least annually and shall document the validation process.

OAAS Recommendation: *The SDSO should establish procedures for removing accounts on the Commander system timely when workers separate from the Sheriff or the County.*

Sheriff's Action Plan: We have reviewed Finding IV and respectfully disagree with the OAAS recommendation.

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The Department has a procedure in place whereby, upon an employee's retirement or resignation, our Personnel Unit sends a notification to our Data Services Division approximately 2-3 days prior to the separation of the subject member. Our Data Services Division then sets the subject's access to the Sheriff's Department server to expire on the date of the separation. When this occurs, the subject no longer has access to log on the Department server or Commander. Prior to the BWC audit, Commander could show a subject had access; however, because server access was already removed, they could not log on to the Commander system or access any BWC videos. When an employee is terminated from the Department, Personnel notifies the Data Services Division immediately to have their account access terminated, thus he or she no longer has access to the Department server, Commander, or any BWC videos. We believe these procedures maintains the Department's compliance with CJIS Security Policy 5.5.1 Account Management.

Since the audit, our Data Services Division has implemented an additional script that simultaneously removes user access from Commander when the employee's Department server access is terminated.

Additionally, as stated in the Department's Action Plan regarding Finding III, our Video Analysis Unit (VAU) will conduct a yearly audit of the Commander users and their roles within Commander to ensure users are assigned the correct access level, or access is removed as appropriate.

While we believe our previous procedures were sufficient to allow the Department to meet the CJIS Security Policy requirements, the Department made the additional procedural changes to the address the auditors' Finding IV recommendation.

Planned Completion Date: Completed.

Contact Information for Implementation:

Aaron Meleen, Sergeant
Division of Inspectional Services

Finding V: BWCs Inventory Tracking Insufficient

The SDSO maintains a list of BWCs to track assigned units (Camera Assignments list), but it does not have a comprehensive inventory list to track all units purchased, including unassigned units. We noted that 6 out of 30 sampled BWCs from the BWC purchase inventory list were not found in the BWC Camera Assignment listing.

The SDSO does not have a process in place to track unassigned BWCs, which may prevent the SDSO from detecting and preventing theft and/or loss of BWCs.

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According to the County of San Diego Administrative Manual 0050-02-01, page 5, department heads are required to maintain listings of minor equipment items for which they are responsible for, adding new items as they are received and deleting items that are disposed of or no longer in use.

Recommendation: *The SDSO should develop a procedure to track and document BWCs assigned and in storage to ensure the accuracy of inventory records.*

Sheriff's Action Plan: We have reviewed Finding V and agree with the OAAS recommendation.

The Data Services Division will create an assignment location in Commander, designated as "Shelf," for BWCs that are in our inventory and not assigned to a specific person. This will ensure all the Department's BWCs can be tracked within the Commander system. Additionally, these unassigned BWCs will be accounted for during the Data Services Division yearly minor equipment physical sight audit.

Planned Completion Date: January 1, 2021

Contact Information for Implementation:
Aaron Meleen, Sergeant
Division of Inspectional Services

The Sheriff's Department is always working to improve our internal processes and we appreciate the OAAS's time and effort to complete this audit. We thank you for the recommendations that will assist us with enhancing the Department's BWC program.

Please let me know if you have any questions.



William D. Gore, Sheriff

WDG:adm