Atlanta Public Schools

Audit Report

Office of Safety and Security
Assessment of Controls over Security Equipment
(Firearms and Ammunition)

Report Date: May 9, 2018



130 Trinity Avenue, SW | Atlanta, GA 30303 Confidential

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Prepared by: Atlanta Public Schools

Office of Internal Compliance

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Distribution

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Executive Summary

The Office of Internal Compliance (OIC) performed an operational audit on the controls over Security Equipment (Firearms and Ammunition) for the Office of Safety and Security. This report provides written communication of the results of testing derived from audit procedures designed to meet the audit objectives.

Conclusion

We determined that OSS has a number of controls in place to effectively mitigate significant risks involving firearms and ammunition. However during our review, we did note the following findings:

- 1. Segregation of duties issue exist for key personnel within OSS
- 2. The quarterly inventory of the weapons' inspections are not documented and the official system of records for the firearms inventory is not used during the process
- 3. NIMBUS, the official system of records for firearms, is not being updated timely to reflect weapons that are issued from or returned to the safe
- 4. NIMBUS has not been turned over to OSS (from NIMBUS Project Management) to be used full time for firearms and ammunition procedures

Background

The Office of Safety and Security (OSS) is led by Dr. Marquenta Sands Hall, Executive Director. The Chief of Police is Chief Ronald Applin. Security Equipment for OSS is identified as firearms and ammunitions. Departmental procedures have been established for the purchasing, issuance and inventory process as it relates to firearms and ammunition.

There are 70 sworn officers who are authorized to carry firearms. The primary weapon for on-duty personnel is the Department issued and authorized Glock Model 17, .9mm caliber firearm. The primary weapon ammunition for on-duty personnel is the Department issued and authorized .9mm caliber, 124 grain. No rifles, tasers or batons are used.

Objective & Scope

We completed our assessment of internal controls over Security Equipment (Firearms and Ammunition) for the Office of Safety and Security. The objectives of our review were to:

- Gain an understanding of the processes and procedures surrounding firearms and ammunition
- Determine if appropriate internal controls exist over firearms and ammunition
- Determine if internal controls are operating effectively
- Identify control gaps, if applicable

In an effort to achieve our objectives, the Office of Internal Compliance performed the following tasks that included, but were not limited to:

- Interviewing key Office of Safety and Security personnel
- Reviewing OSS Policies and Procedures
- Verifying segregations of duties in the handling of firearms and ammunition
- Testing internal controls

The scope of the audit focused on OSS Firearm and Ammunition processes and procedures during September 1, 2016 to January 19, 2018.

Findings

We determined that OSS has a number of controls in place to effectively mitigate significant risks involving firearms and ammunition. Those controls include the following:

- Controls are in place to ensure proper purchasing of weapons
- Controls are in place to ensure proper issuance of weapons
- Controls are in place to ensure proper training and certification of officers

However during our review, we did note the following Findings:

Finding 1: Segregation of duties issue exist for key personnel within OSS.

Activities	Chief of Police	Armorer (Commander)
Approve Purchase of Firearms**	X	
Update/Edit NIMBUS (Official Record)	X	X
Issue Weapons	X	X
Conducts Inventory of Weapons	X	X
Access to Vault	X	X
Access to Safe	X	X

^{**} Appropriate mitigating controls are in place to detect irregularities during the approval process.

Risk: The current system and/or physical access allows the opportunity for the Chief of Police or Armorer to remove weapons from the safe undetected.

Recommendation:

The Office of Safety and Security should ensure the inventory inspection of the weapons is performed by someone other than the Chief or the Armorer to mitigate the segregation of duties issue.

Response

Moving forward, the Security Operations Director will conduct the inventory inspection of weapons quarterly. The Chief of Police/designee will be present to provide access and note the inspection results in NIMBUS while on site on the same day the inspection is completed.

Dr. Hall will be leaving on June 30, 2018. Upon Dr. Hall leaving, and until her replacement has been named, Mr. Hoskins will be the designated person to review and take action for suspicious activity.

Finding 2: The quarterly inventory of the weapons' inspections are not documented and the official system of records for the firearms inventory is not used during the process.

The Chief of Police uses the Weapons Release Form Log (excel spreadsheet) to perform a quarterly inspection of the weapons. However, there is no documentation maintained to evidence that the inspections actually occur.

Risk: The current system allows the opportunity for weapons to be removed from the safe undetected.

Recommendation:

- The quarterly inspection of the weapons should be documented and maintained. The documentation should be signed and dated by the person who performs the inspection.
- Inventory reports generated from the official system of records, NIMBUS, should be used to complete the quarterly inventory inspections.

Response

As described above, we will continue to conduct quarterly inspections of the weapons, document this inspection and incorporate the results into the NIMBUS system the same day as the inspection is completed.

Finding 3: NIMBUS, the official system of records for firearms, is not being updated timely to reflect weapons that are issued from or returned to the safe.

The NIMBUS Project Manager has been responsible for making changes in NIMBUS on behalf of the Office of Safety and Security. This is because the NIMBUS system has not been turned over completely to OSS so that the Chief and the Armorer can take over their NIMBUS responsibilities full time. The Weapons Release Form Log (excel spreadsheet) has been used by OSS as their main source record to update the status of the weapons. As such, NIMBUS is not being updated (at the same time as the Weapons Release Form Log (excel spreadsheet) to reflect the status of weapons.

Risk: NIMBUS, the official system of records, may not reflect accurate weapons' status and count.

Recommendation:

Implement procedures and standards around when updates to the NIMBUS system should be made. To ensure accurate records, OSS should consider updating NIMBUS records on the same day as weapons transactions are executed.

Response

We currently have a SOP in place to address the use of NIMBUS for updates with the status of all firearms. All updates will be done immediately after a status change of any weapon.

Finding 4: NIMBUS has not been turned over to OSS (from NIMBUS Project Management) to be used full time for firearms and ammunition tracking.

The NIMBUS Project Manager has been responsible for making changes in NIMBUS on behalf of the Office of Safety and Security. This is because the NIMBUS system has not been turned over completely to OSS.

The Weapons Release Form Log is maintained by the Chief of Police and Armorer in an electronic file and in the NIMBUS APS service support system. Both are used to capture any change of status for each firearm and semiannual inspections. Both the Chief and the Armorer have access to input information into NIMBUS; however, it is not being used by the Chief or Armorer. These two are not reconciled or signed by the Chief or the Armorer.

Risk: Maintaining the NIMBUS system and the Weapons Release Log (excel spreadsheet) may lead to inconsistencies in records and result in duplicative efforts in maintaining two databases of weapons inventory.

Recommendation:

> OIC recommends a timeline that transitions the NIMBUS Weapons Inventory function over to OSS.

Response

The NIMBUS weapon inventory function was turned over to us on March 22, 2018. Dr. Hall will be leaving on June 30, 2018. Upon Dr. Hall leaving, and until her replacement has been named, Mr. Hoskins will be the designated person to review and take action for suspicious activity.

We want to extend our appreciation to the management and staff at the Office of Safety and Security for their cooperation and courtesies extended to us during the audit.

Respectfully submitted,

Tiffany Cherry, CFE Lead Internal Auditor Connie Brown, CIA, CRMA

Executive Director of Internal Compliance