



PORTLAND POLICE BUREAU:

Drug training aid procedures strengthened,
recently improved practices should continue

May 2010

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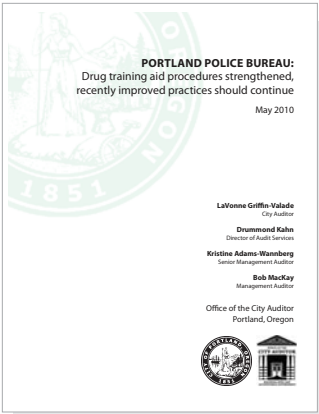
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May 20, 2010

TO: Mayor Sam Adams
Commissioner Randy Leonard
Commissioner Nick Fish
Commissioner Amanda Fritz
Commissioner Dan Saltzman
Michael Reese, Chief, Portland Police Bureau

SUBJECT: Portland Police Bureau: Drug training aid procedures strengthened,
recently improved practices should continue (Report #391)

The attached report contains the results of our audit on controls over Police Bureau drug training aids. Portland Police use trained dogs to help conduct searches for illegal drugs. The program uses drugs as training tools to ensure canine and dog handler proficiency in drug searches. We audited the Police Bureau's Drugs and Vice Division's controls over physical security, inventory, and access to the controlled substances it uses as training aids for the program.

We found that the Division's proposed policy for controlling drug training aids is strong, and compares favorably with other local police practices. In addition, physical security of the drugs appears adequate. We also found, however, that better practices are needed to match the strength of the new procedures. Some documentation requirements used to track the inventory of drugs have not been complied with in the past, though recent efforts to keep better track of the training aids are encouraging.

The Police Bureau's Drugs and Vice Division requested this review by the City Auditor in order to improve their controls over training aids and their standard operating procedures. We appreciate the Bureau's desire for an independent review and thank the Drugs and Vice Division staff for their cooperation and assistance throughout the audit.

LaVonne Griffin-Valade
City Auditor

Audit Team: Drummond Kahn
Kristine Adams-Wannberg
Bob MacKay

Attachment

PORTLAND POLICE BUREAU:

Drug training aid procedures strengthened,
recently improved practices should continue

Summary We audited the Portland Police Bureau's Drugs and Vice Division's controls over physical security, inventory, and access to the controlled substances it uses for its drug detection dog program. Portland Police use trained dogs to help conduct searches for certain narcotics (illegal drugs).

The program uses drugs as training tools to ensure canine and dog handler proficiency in drug searches. During our review, we found:

- Portland's proposed policy for controlling drugs used as training aids compares favorably to other local police practices
- The proposed policies provide stronger controls over drugs used as training aids, though a few procedures could be further strengthened
- Better practices are needed to match the strength of the proposed procedures. While the Division met many documentation requirements in its master log, some policies were not implemented until recently. For example, inventory checks were often sporadic and officer signatures were not always present
- Physical security of the drugs appears adequate

It is important to note that this audit was not conducted due to a specific concern about the Portland Police Bureau's controls over drug training aids. Rather, it was conducted because the Drugs and Vice Division requested this audit from an independent evaluator to assist them in improving their standard operating procedures.

Background

The primary purpose of the Portland Police Bureau's Drug Dog Detection Program is to help narcotics investigations by using the dogs' sense of smell as an investigative tool. The dogs can find hidden drugs that might not otherwise be found by human investigators. The dogs also help provide probable cause needed to apply for search warrants when they detect drugs in cars, packages, and other items. According to the Portland Police Bureau, during the tenure of one drug dog team (one dog and one officer), the dog found over 600 pounds of drugs, with an estimated street value of \$15 million.

An important key to a detection dog and its handler's continued success is being exposed through on-going training to different types and amounts of drugs. Portland's detection dogs are trained to detect several different narcotics, including heroin and marijuana. The Portland Police Bureau officers who handle the dogs perform training with the dogs daily in order to maintain the dogs' proficiency. In addition, the teams are required to pass the Oregon Police Canine Association Detection Dog Standards Test twice a year. Certification indicates that a drug dog is proficient and reliable at detecting narcotic odor. According to the Oregon Police Canine Association, over 40 local, state, and federal government agencies in Oregon had drug detection dog teams certified between November 2008 and December 2009.

Detection dog units may use training aids – samples of drugs to be used in training – that have been obtained through police property/evidence divisions. In other instances, dog teams may be able to obtain drugs for training with authorization from the U.S. Department of Justice's Drug Enforcement Administration.

Figure 1 Drug detection training



Source: Audit Services Division

These drugs are needed for training purposes, but their presence generates the need for good safeguards to deter loss or theft. Loss or theft could result in a variety of consequences, such as the drugs not being available for training, criminal activity, abuse of the drugs and possibly employee impairment. In addition, poor internal safeguards place employees at risk of being falsely accused of wrongdoing.

The Portland Police Bureau's main controls and documentation requirements are described in the Drugs and Vice Division's Standard Operating Procedure 629. The policy outlines protocols and practices for activities such as checking out training aids, repackaging, and returning the drugs to the Police Bureau's Property and Evidence Division for destruction.

In addition, the Bureau maintains a master logbook and officer inventory logs. The master log tracks certain activities performed by the dog handlers or their supervisors. The master logbook is kept in the Drugs and Vice Division, and the officer inventory logs are kept with the training aids.

Internal controls are policies, procedures, and activities designed to help an organization achieve its management objectives, safeguard resources, report reliable information, and comply with applicable law. Organizations need good internal controls to safeguard resources from loss, waste, and abuse and to help ensure that organizational goals and objectives are met. While internal controls cannot completely eliminate the risks for inappropriate actions, well-conceived procedures and a good control environment can minimize the potential for abuse and increase detection of problems¹.

Objective, Scope, and Methodology

The objective of this audit was to review the Portland Police Bureau's Drugs and Vice Division's management controls over controlled substance training aids. We reviewed current and proposed standard operating procedures for inventory checks, drug repackaging, and damaged or missing drugs. We reviewed the Division's master logbook for about a five-year period – from July 2004 through July 2009 – to determine how the Division's standard operating procedures were implemented. We also reviewed the physical security of the current drug training aids.

We compared some of the Division's controls against those of other local police agencies with drug dog programs. In doing so, we sent out questionnaires to five jurisdictions requesting information on their programs. We received four back, which we used for analysis. These jurisdictions represent two local Oregon counties and two cities, and we agreed not to specifically name them in this report.

¹ Based on the Committee of Sponsoring Organizations of the Treadway Commission's *Internal Control-Integrated Framework*.

We interviewed management and staff in the Portland Police Bureau's Drugs and Vice Division as well as the Property and Evidence Division. We observed drug detection dogs and their handlers performing maintenance training, and we reviewed professional information about detection dog teams and their certification requirements.

It is important to note that this audit was not conducted due to a specific concern about the Bureau. Rather, it was conducted because the Drugs and Vice Division was interested in improving its standard operating procedures, and we agreed to perform this independent assessment to inform those efforts.

We conducted this performance audit in accordance with generally accepted government auditing standards. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Audit Results

Portland's proposed policy requires heightened controls over drug training aids

The Drugs and Vice Division is proposing revisions to the current Standard Operating Procedures (SOP) that would establish better internal controls over the training aids. The Bureau's current policies are outlined in *SOP 629: Drugs and Vice Division Narcotics Detection Dog*. The current SOP went into effect in April 2008, and it covers the training of the drug dog teams and the supervision and monitoring of drugs used for training exercises.

The Police Bureau developed revisions to the Controlled Substance Training Aids section of the SOP to improve their controls over the drug training aids. The revisions would reduce the amount of aids immediately accessible to the officers but would allow management to sign out larger aids to the officers for periodic training. The proposals would allow the Division to obtain additional aids they need for training, to strengthen supervision, to improve monitoring, and to better protect the assets involved. This is done through the following:

Control Environment and Monitoring – The proposed SOP provides more formal recognition that the responsibility for care and custody of the aids is not only the dog handlers' obligation but also the responsibility of supervisory staff. The new SOP also gives more focus on keeping higher levels of management informed. Upper management gets regular updates about inventory checks, as well as notification if there is a problem, such as a lost or damaged aid.

Control Activities – Inventory checks are done more frequently for the smaller amounts of training aids to which the officers have access (three months rather than six months) and monthly for larger amounts kept in the Drugs and Vice Division. There is a good segregation of duties between the officers and supervisors on inventory inspections, as well as when larger amounts of aids are checked out from the Division to vary the amounts used for training the dogs. Limited access to the larger amounts of drugs in the Division rests with two management personnel.

While the proposed changes would improve the Division's internal controls, there are a few policies that might be strengthened further. For example, unscheduled inventory inspections should be performed. This is a good control, because it can catch problems between regular inspections. In addition, rather than the current proposal to change out drugs for new ones on an as needed basis, a recommended schedule (at least once a year) should be identified to ensure the drugs used are fresh. The proposed SOP only states that the aids will be periodically replaced, but it would be more proactive to have a recommended replacement cycle.

Portland's proposed policy compares favorably with other local jurisdictions

As part of our review of Portland's new SOP, we also considered the practices of other metro-area jurisdictions with drug detection dog programs. We sent a survey out to five jurisdictions, to which four responded. The survey addressed their controls, policies, and procedures over drug training aids. Overall, we found that Portland's proposed controls compared well against those of other jurisdictions. A summary of the responses from the other jurisdictions compared to Portland is provided in Figure 2.

Figure 2 Summary of jurisdictions’ drug dog training aid controls

Process reviewed	Jurisdiction A	Jurisdiction B	Jurisdiction C	Jurisdiction D	City of Portland (proposed)
Aid check-out (for on-going training)	Secure location with officer access	Secure location with officer access	Sergeant signs-out	Sergeant signs-out	Small amounts in secure location with officer access. Larger amounts in safe with management sign-out.
Inventory documentation	Aids weighed and documented on form	Aids documented on form	Aids weighed and documented on form	Aids weighed and documented on form	Master log kept with weights and descriptions. Memo to management on results of inspection.
Inspection frequency	3 to 6 months	Supervisor’s discretion	3 months	3 months	Small aids - 3 months. Large aids - monthly.
Repackaging and damaged aids	Aids exchanged if needed	Aids are reweighed, documented and initialed by supervisor. Management notified.	Damaged aid shown to Sergeant or Lieutenant. Reweighing witnessed by supervisor.	Aid returned to evidence unit. Aid is reweighed and documented on form.	Aids are weighed and supervisor oversees process and weighing. Damaged aid documented and management notified.
Typical replacement schedule	6 months to 1 year	1 year	2 years	1 year	Periodic
Destruction by property or evidence unit	Yes	Yes	Yes	Yes	Yes

Source: Audit Services Division analysis of survey responses from other jurisdictions and proposed SOP 629

With the safeguards of the proposed SOP, Portland officers who handle the drug detection dogs appear to be well-positioned in terms of controls. The proposed SOP will benefit Portland's drug dog officers by specifying responsibility over custody and care of drug training aids, increasing the frequency of inventory inspections, informing more upper management should aids be lost or damaged, and tightening control procedures over checking out and/or repackaging of training aids.

Where Portland was not keeping up with the other jurisdictions was in the timeliness of replacing training aids. According to the Division, stale drug training aids may be less effective in training the dogs than fresher aids. The Scientific Working Group on Dog and Orthogonal detector Guidelines recommends replacing training aids every one to three years. The Division's proposed SOP calls for changing out training aids on an as-needed basis; however, the Division has not been rotating its training aids consistent with professional guidelines. All of the comparison jurisdictions have a replacement schedule. Portland should consider adopting a specific timeframe for rotating drug training aids.

The quantity of drugs used is also an important variable in the successful training of drug detection dogs. Various scientific and certifying bodies recommend or require using a variety of different amounts for training. Even with the increased amounts of drug training aids being proposed, Portland will be in the middle of the local comparison jurisdictions in terms of amounts of readily accessible aids for training purposes.

Better practices are needed to match the strength of new procedures

Nothing came to our attention during the course of our review that would indicate inappropriate use of drug training aids by Police Bureau personnel. However, we found the practice of implementing the Division's current policies needs improvement. While some practices were sound, some of the shortfalls in implementation could expose the drugs to theft.

Many documentation requirements met in master log but, until recently, inventory checks were sporadic

The current SOP 629 requires that officers record several types of information in the master log during an inventory check, when repackaging occurs, and when training aids are damaged or missing. These include the date, the weights of the training aids, the supervisor and handler's signatures, and the time. In addition, the current SOP requires a memo to be sent to the Division Captain with the results of inventory checks.

We reviewed the Division's master log documentation for all events from July 2004 through July 2009 (five years) against the controlled substance training aids requirements of the SOP currently in place. The SOP and the master log are the Division's main internal control for documenting the assignment and inventory of the training aids provided to the drug dog handlers.

It should be noted that the current SOP was implemented on April 18, 2008. According to the Police Bureau, however, there have been no significant changes to the SOP regarding drug training aids and dog training since the original policy was written in 1999. Because of this, we used the requirements of the current SOP applied to the time of our review prior to the April 18, 2008 effective date (July 2004 - April 2008). A summary of the results of our review is provided in Figure 3.

Figure 3 Condition of selected internal controls and potential improvements

Process reviewed	Current condition	Potential improvements
Inventory checks	<ul style="list-style-type: none"> • Inventory checks done sporadically until recently • Documentation of aid weights and supervisor signatures nearly always present • Officer signatures present over half of the time • Memos to Division Captain documenting inspection available more recently, but older memos were not located • Time of inspection never listed in memos 	<ul style="list-style-type: none"> • Continue recent efforts to do regular inspections • Add unscheduled inspections • Ensure officer signature is present • Continue recent efforts to complete memos to management regarding the results of inspections • Delete SOP requirement for listing time
Repackaging	<ul style="list-style-type: none"> • Most controls followed • Officer signatures sometimes lacking • Time of event rarely listed • Supervisor signature was not required but was always present 	<ul style="list-style-type: none"> • Ensure officer signature is present • Delete SOP requirement for listing time
Damaged or Missing Aids	<ul style="list-style-type: none"> • Controls in place and consistently followed 	<ul style="list-style-type: none"> • Provide reason in log for why repackaging occurred

Source: Audit Services Division analysis of Division master log

Inventory Checks – According to the current SOP, inventory checks are to be done every six months for each officer’s inventory of training aids. We found that the checks were done sporadically in all but seven months of the review period (December 2008 to July 2009). In 2004, there were no inventory checks documented, and from 2005 through mid 2008, there were periods greater than six months between assessments.

In the 13 cases between May 2005 and July 2009 where an inventory was documented, the log always listed the gross weight of the training aid and nearly always contained evidence of the supervisor signing the log. Officer signatures were less consistent – we found officer signatures in 7 of 13 cases (54%).

There were four memos from supervisors to the Division Captain documenting inventory checks. The memos did not list the weights of the drug training aids, but rather referred to the weights detailed in the master log. The memos never identified the time of the inventory check. This is an SOP requirement; however, it appears to have no beneficial purpose as a control. Division staff could not locate the other 9 memos, but told us that in recent years, the memos were prepared during the semi-annual inspection and were forwarded to the Chief's Office.

Repackaging – Five repackaging events were documented in the log and a supervisor signature was always present. The supervisor's signature was not required by the current SOP, but it represents a good control to have in place. The officer's signature was present on the records for 3 of these 5 cases (60%). In addition, the time of the repackaging was only listed once in the 5 cases. Although the current SOP does not require listing a reason for repackaging, some of the information was available in the log. This information could be helpful if there is a question as to why the event occurred.

Damaged or missing substances – The current SOP requires the officer to notify the supervisor about damaged or missing drug training aids. The procedure does not require that the communication is documented in the log book. Since damaged and/or missing drugs represent a higher risk to the organization (there is a greater potential that abuse may have occurred when this event is noted), we used a stricter standard than what is required by the current SOP. This standard was that in all documented instances, the supervisor's signature was present as evidence the supervisor was informed. In all cases we reviewed, the stricter standard was met.

We inquired about the reason for any deviations in practices between the log and the current policy. Division staff told us that although the inventory checks were required to occur every six months, ex-

actly when those checks were to occur and who was to perform them were unclear. In addition, the officers had different supervisors, since there was significant turnover in sergeants during the earlier years, and management's focus was more on narcotics investigations. Inventory checks and memos to document them became more common after the inventory became part of the regular semi-annual inspection process for the Division. The Division told us that this shift occurred in 2007 or 2008. In addition, staff thought the lack of officer signatures was likely just an oversight.

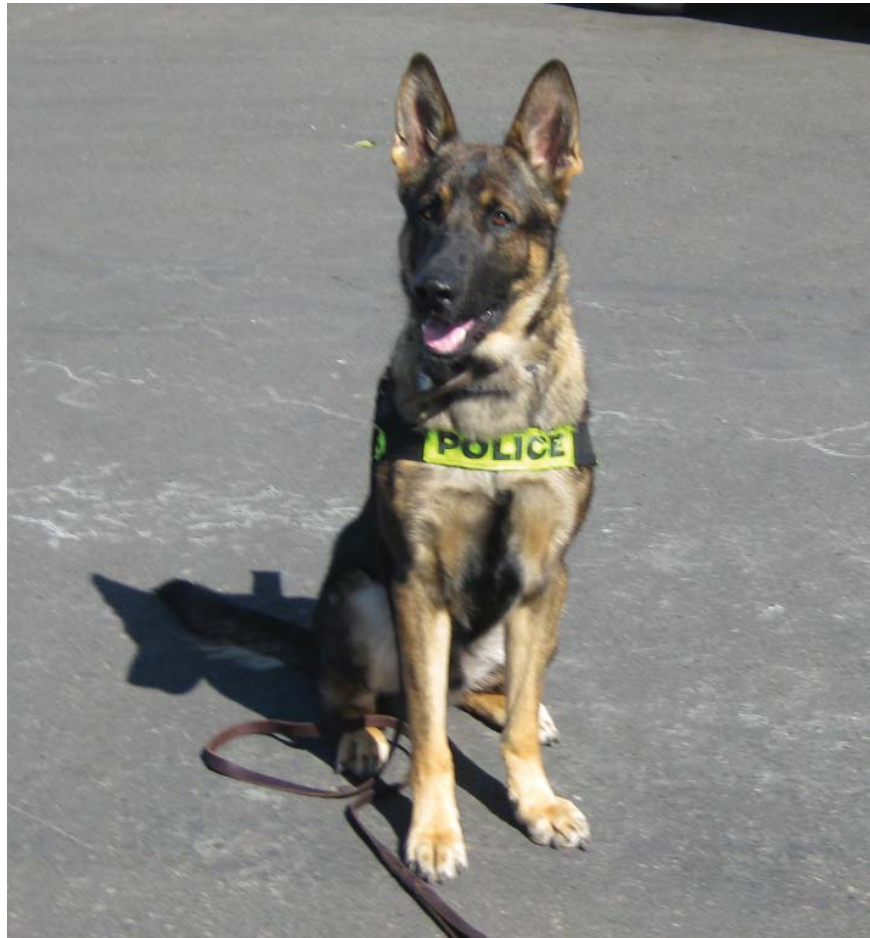
The most significant issues we found were the sporadic frequency of when the inventory checks were done, the number of officer signatures not present in the logs, and the memos to police management that may have been completed but could not be located. In 2004, there were no inventory assessments documented. Between 2005 and mid-2008, only one of the checks was done within six months or less of the previous inventory check. Most were 13 to 15 months between checks. From mid-2008 to mid-2009, however, checks were done more regularly. Inventory checks are important. Without the records, if a situation of theft or abuse occurred with the drug training aids, there would be little way to determine the time frame of occurrence. This could make an investigation more difficult.

Another problem was the lack of officer signatures. Signatures were present a little more than half the time for inventory checks and repackaging. Without those signatures, an officer could dispute whether they witnessed an inventory check. The officer might then be unaware of a performance problem.

Another issue is the memo communicating the inventory check to management. Memos communicating the inventory results to the Captain were in the log for the two most recent inventory checks. According to Division staff, they were unaware of where the other memos were located. This could indicate that either they were not done, or they were done but have been misplaced. The memos are an important tool because they keep upper management informed and facilitate management's monitoring function. In addition, if the memos contained an attachment with the actual weights listed, rath-

er than just a reference to the log book, and if a copy of the complete memo was kept in the Division, it could serve as a good back-up record for the Division. This could be used in case the master log was damaged or lost.

Figure 4 Portland drug detection dog



Source: Audit Services Division

Physical security appears reasonable

In addition to reviewing the master log, we also assessed the current and proposed physical security of the drug training aids. The proposed SOP indicates that larger amounts of aids will be kept in a secured location in the Justice Center. Access to the larger aids is limited to the Captain and Lieutenant. The smaller amounts of training aids will continue to be accessible to the dog handlers, also in a secured location, for their on-going training needs. These security measures meet the requirements of the current and proposed policies and appeared reasonable during our observations. According to the Division, the security also meets with the requirements of the U.S. Drug Enforcement Administration.

Recommendations

We found that some of the Bureau's current policies and management objectives were met, and that there was some improvement in the last year in implementing the current procedures over drug training aids. New policies proposed should provide stronger controls, but care should be taken to ensure that the policies are fully implemented. Based on our work, we recommend that the Commissioner-in-charge, though the Portland Police Bureau's Drugs and Vice Division, take the following steps:

1. Adopt the proposed Standard Operating Procedure with minor modifications

The proposed SOP reflects stronger controls than current policy. It provides more formal recognition that the responsibility for the aids is not only the officers' obligation, but also the responsibility of supervisory staff. There is a good segregation of duties proposed between officers and supervisors, and their access to the larger aids is limited to a few management personnel. There is also more focus on keeping higher levels of management informed.

The Division should consider these specific changes before adoption:

-
- We recommend adding a schedule to the policy that identifies when drugs should be changed out. A one-year replacement cycle may be reasonable, for example.
 - The Division should continue to record the date of the inspection but eliminate the requirement to list the time of day in which the inspection occurred, since the latter control appears non-beneficial.
 - In addition, it should add a requirement that when repackaging occurs that the reason for the processing be noted (drugs were damaged, different size aids were needed, etc.)

2. Improve implementation practices and monitoring

Although records in the master log for damaged substances and repackaging were reasonable overall, inventory checks need to be performed on-time and need to be better documented. We recommend the following:

- Management ensure that inventories are performed on the three-month schedule, and larger drugs on a one-month schedule, as proposed.
- Supervisors and officers also should take extra care to make sure all needed signatures are present, and that management is informed of the results of the inspections.
- In addition to proposed regularly scheduled checks, we also recommend that inventories be examined on an impromptu basis.

Responses to the Audit



CITY OF PORTLAND, OREGON



Bureau of Police

Sam Adams, Mayor

Michael Reese, Chief of Police

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May 17, 2010

LaVonne Griffin-Valade
City Auditor
1221 S.W. 4th Avenue, Room 140
Portland, Oregon 97204

RE: Drug Dog Detection Program Audit

Dear Ms. Griffin-Valade:

I want to express my appreciation to your office for reviewing our Drug Dog Detection Program. This audit has reinforced the strengths of our program and also pointed out areas for improvement.

Your audit has a range of recommendations including having specific timelines for rotating narcotics samples, eliminating the requirement to enter the time of day on the log when inspecting narcotics samples and making a notation when narcotics are repackaged. In addition, your audit recommends improving our monitoring practices so that inventory checks occur on time.

We find that your comments and recommendations are both helpful and practical. Therefore, we will implement the changes you recommend.

Again, please accept my thanks for your willingness to honor our request for this audit. Auditors Kristine Adams-Wannberg and Bob MacKay are thorough, tough yet collaborative investigators. Their efforts are appreciated.

Sincerely,


Sam Adams, Mayor
City of Portland


MICHAEL REESE
Chief of Police

RMS/DB/bje

c: Assistant Chief Eric Hendricks
Captain Dave Benson

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Report #391, May 2010

Audit Team Members: Kristine Adams-Wannberg
Bob MacKay

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LaVonne Griffin-Valade, City Auditor
Drummond Kahn, Director of Audit Services

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