



Colorado Springs Police Department

General Order

1700 Internal Audits & Inspections

Section 1700 – Resource Control

Effective Date: 4/5/2022

Supersedes Date: N/A

.01 Purpose

The purpose of this directive is to outline the requirements for conducting internal audits and inspections to assess the department in a consistent, fair, and professional manner.

.02 Cross-Reference

[GO 400 Employee Conduct \(Sworn & Civilian\)](#)

[GO 1773 CALEA Accreditation Management](#)

.03 Discussion

The primary objective of internal auditing is to promote transparency and accountability by ensuring that proper management and internal controls are in place. In doing this, the department will work to reinforce the efficiency of departmental operations, while ensuring the quality of services provided to the community.

A thorough and accurate audit program provides a valuable service to the department via examining compliance with policy, identifying areas for improvement, and ensuring appropriate modification occurs. Internal audits can assess risk and make comparisons against previously established benchmarks, goals, objectives, directives, regulations, and laws. Additionally, auditors can consider a variety of circumstances and influences from both internal and external variables.

The goal of the Colorado Springs Police Department's (CSPD) internal auditing program is to identify compliance, conformity, and uniformity of department-wide operations, while simultaneously increasing effectiveness and efficiency by providing objective insight, foresight, and oversight. This directive is designed to outline expectations of compliance, or lack thereof, with statute and policy, along with promoting utilization of common law enforcement practices, fostering accuracy in audit activities, and providing transparency regarding the processes and standards for the conduct of those activities.

.04 Policy

The chief of police, or their designee, along with the Audit & Compliance Unit of the Professional Standards Division (PSD), is responsible for establishing and maintaining an internal audit structure with appropriate checks and balances to ensure objective and effective internal oversight of agency practice and compliance.

CSPD internal auditors will maintain independence in all matters relating to audit work, professional appearance, and engagements. This includes but is possibly not limited to opinions, findings, conclusions, judgements, and recommendations, which will be viewed as impartial and reasonable.

While the scope of internal audits may vary from one assignment to another, based upon operational contingency, personnel may be assigned to participate and/or assist as deemed appropriate by the chief of police, or their designee, and will be obligated to comply with this directive throughout the audit process.

Auditors must utilize professional judgment and competence when planning and performing all audit engagements including exercising reasonable care and professional skepticism.

The chief of police, or their designee, will take appropriate action in response to and ensure resolution of audit and/or compliance-related issues identified during an internal audit.

This directive applies to all internal audit activities within CSPD which may include CALEA-related standards, but not specifically for the purpose of a CALEA audit, proving compliance, or audits that may be conducted by an external entity.

The Audit & Compliance Unit will act as the point of contact for all audit-related activities both internal and external, including transmission of all audit inquiries or reports directly related to or referencing CSPD.

.05 Definitions

Assessment: A systemic process for examining an organization or process to understand the current practice and status in achieving its intended purpose. (e.g., inspection, audit)

Audit Objectives: What the audit is intended to accomplish. They identify the audit subject matter and performance aspects to be included. Audit objectives can be thought of as questions about the program that the auditors seek to answer based on evidence obtained and assessed against criteria. Audit objectives may also pertain to the current status or condition of a program.

Audit Process: The system and specific steps auditors perform to accomplish the audit objectives.

Audit Program: A group of related services or activities that are provided or administered by an agency for various accountability purposes.

Audit Team: A group of personnel (sworn and/or civilian) selected to assist with an internal audit who are knowledgeable of or oversee a given area within the department. Those selected for the position will participate in the team as an ancillary responsibility, functioning under the authority of the Compliance Unit and the requirements of this directive.

Benchmark: The process of measuring of an organization, its functions, processes, or results and services (e.g., compliance with standards) against common law enforcement standards set by other entities and/or by the agencies own past practices for process improvement and performance comparison.

Independence: The GAGAS standard for independence requires that auditors, audit teams, and all audit work, maintain independence in both mind and appearance.

Internal Auditing: An independent, objective assurance and consulting activity designed to add value and improve an organization's operations by bringing a systemic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

Internal Control: A process effected by an entity's oversight body, management, and other personnel that provides reasonable assurance that the objectives of an entity will be achieved.

Line Inspection: Inspections which seek to exercise control through the processes of observation and review by those directly responsible for a particular function or activity. Line inspections are made by those who have the authority to require immediate corrective actions. Line inspections may or may not require formal written reports, depending upon the nature of the results.

Methodology: The nature and extent of audit procedures for gathering and analyzing evidence to address the audit objectives.

Opportunity for Improvement: Not below standards but opportunities to improve entity processes or administration were identified.

Recommendation: An issue that was determined to be below standards in internal controls; noncompliance with provisions of laws, regulations, contracts, or grant agreements; or instances of fraud. Elements of a recommendation generally include criteria, condition, cause, and effect or potential effect.

Risk Assessments: A systematic process of evaluating the potential risks or hazards and analyzing potential impacts resulting from such an occurrence to improve processes and or preventative management.

Risk: The possibility that unplanned events will occur that may adversely affect the organization in its role to fulfill its mission and achieve its objectives.

Scope: The boundary of the audit and is directly tied to the audit objectives. The scope defines the subject matter that the auditors will assess and report on, such as a particular program or aspect of a program, the necessary documents or records, the period of time reviewed, and the locations that will be included.

Significance: The relative importance of a matter within the context in which it is being considered, including quantitative and qualitative factors.

Staff Inspections: A detailed observation and analysis of departmental elements, procedures and practices designed to inform the chief of police about their performance and effectiveness. Staff inspections is a process outside of the established lines of authority and responsibility. Staff inspections are considered formal inspections and will result in a written report to the chief of police following a prescribed format.

.10 Internal Audit Authority

The chief of police, or their designee, has the sole authority to initiate any/all audits and inspections, including but not limited to establishing regularly occurring audits, assignment of personnel, and implementation of recommendations, as deemed appropriate.

The chief of police may delegate their authority to the internal auditor, working on their behalf, when conducting internal audit functions.

.20 Audit Personnel

Professional Development, Compliance, and Wellness Lieutenant

The internal auditor function is overseen by the Professional Development, Compliance, and Wellness Lieutenant (PDCW). The assigned lieutenant will maintain oversight of each audit process, ensuring each audit is independent, complete, and objective.

Internal Auditor

The Internal Auditor reports directly to the PDCW Lieutenant. They have a professional duty to provide independent, unbiased, and objective assurance regarding the agency's internal control process, risk management governance is operating effectively to minimize liability conducted via the audit and inspection process.

The internal auditor will conduct audits and inspections under the authority of the chief of police, that are consistent with the Generally Accepted Government Auditing Standards (GAGAS), published by the U.S. Government Accountability Office (GAO), to promote the integrity and credibility of the internal audit process.

The role of internal auditor will be assigned to personnel who have training, knowledge, skills, and abilities to conduct independent internal audits as well as appropriately recognized certifications.

Audit Team

The audit team will be selected to assist the internal auditor in the audit process based upon their knowledge of the area being audited. Once notified of selection they will be briefed on the obligations and requirements of the audit process.

Personnel selected to serve as an ancillary member of the audit team will function independent of their assigned chain of command while completing audit related functions. Ancillary audit team personnel will report their activities and findings directly to the internal auditor.

.30 Ethics

Internal auditors and the internal audit work performed will adhere to the ethical principles identified by GAGAS and department directives. The internal auditor and the auditor teams will conduct their work in adherence with the fundamental ethical principles guides from GAGAS that include the public interest, integrity, objectivity, proper use of government information, resources and positions, and professional behavior. All documentation and information given to internal auditors during an audit will be handled with strict confidentiality, in accordance with GAGAS and CSPD directives.

.35 Independence

In all audits utilizing GAGAS standards, the auditor and the auditor teams must remain independent from the audited entity during the periods that fall within the period covered by the subject matter and/or the period of professional engagement.

The auditor and the audit teams should avoid situations that could lead reasonable and informed third parties to conclude that the auditor and audit teams are not independent and thus not able to exercise or maintain objective and impartial judgement in any/all internal audit related tasks and subsequent reporting.

In maintaining appropriate independence for internal auditing, the internal auditor and audit teams must complete the statement of independence form attached below for every internal audit conducted.

The internal auditor should apply the GAGAS Conceptual Framework for Independence to

evaluate threats to independence at the organizational, audit team, and individual auditor levels.

These threats can be categorized as:

- *Self-interest* – The threat that a financial or other interest will inappropriately influence an auditor's judgment or behavior.
- *Self-review* – The threat an auditor who does not appropriately evaluate the results of previous judgments made when forming a judgement significant to an audit.
- *Bias* – The threat an auditor who, as a result of political, ideological, social, or other convictions, take a position that is not objective.
- *Familiarity* – The threat that aspects of a relationship with management or personnel of an audited entity will lead an auditor to take a position that is not objective.
- *Undue Influence* – The threat that influences or pressures from sources external to the audit organization will affect an auditor's ability to make objective judgments.
- *Management Participation* – The threat that results from an auditor's taking on the role of management or otherwise performing management functions on behalf of the audited entity which will lead the auditor to take a position that is no objective.
- *Structurally based* – The threat that an audit organization's placement within a government entity, in combination with the structure of the government entity being audited, will affect the audit organization's ability to perform work and report results objectively.

The internal auditor will provide the audit teams with resources to identify threats to independence, evaluate the significance of the threat, and apply safeguards to eliminate or reduce an identified threat.

In situations where a threat to independence cannot be mitigated to an acceptable level, the internal auditor will be notified and determine whether to decline to perform the audit or terminate an audit in progress.

If an audit is terminated in progress, due to a threat to its independence, the internal auditor will submit a memorandum thru the audit chain of command to the chief of police, outlining the circumstance, attempts to mitigate the threat and rationale for termination. The chief may submit the notification to Internal Affairs for an investigation as deemed appropriate.

Conflicts of Interest

While the audit teams may be comprised based upon availability, complexity of project, particular skills, background, or access, there is the potential for conflicts of interest that may compromise the independence required to participate in an audit. Audit team personnel falling under the scope of an audit or inspection must meet a threshold of verifiable involvement or perceived significant participation in order to recuse themselves from their responsibilities during an audit.

If/when this occurs, another similarly qualified person will be selected to assist or act as the supervisory authority throughout the audit process.

Exception: This does not, in any way, preclude a commander or subordinate supervisor from conducting line-inspections within individual commands, to ensure assigned tasks or required actions are performed and complied with per CSPD directives.

.40 Assessing Risk

The chief of police, or their designee, will ensure internal audits and other risk evaluations are conducted, as deemed appropriate, to monitor compliance and assist in the resolution of issues in identified areas.

Risk assessments will be topically related and will be conducted on an annual department wide basis. The purpose of assessing risk, which is significant to the audit planning and scope of work, provides strategies, techniques, and approaches for identifying and reducing potential threats to the organization.

Audits and inspections are driven by risk and utilize a risk assessment model to identify, rank, and mediate known and potential risk. By assessing risk, this enables CSPD to more effectively protect personnel and the public from injury, monitor and reduce liabilities, reduce accidental loss, and provide loss prevention tools.

The goals of risk assessments include increasing the understanding of all aspects of the organization, ensuring all uncertainties and risks are examined and considered to establish possible implications and potential responses if something should go wrong.

Fraud, Waste, & Abuse

Department personnel must be good stewards of resources entrusted to them and exercise due diligence to prevent and detect criminal conduct and non-compliance with laws and policies. Examples of fraud include lying on an employment application, falsifying records, or providing false receipts for reimbursement.

Department personnel are responsible for reporting fraud, waste, or abuse per this directive. Department personnel who report suspected fraud, waste, or abuse can do so without fear of retaliation.

Engaging in acts of fraud, waste, and abuse may result in discipline up to and including termination and civil or criminal liability upon completion of appropriate administrative/criminal investigations.

.50 Audit Process

The audit process encompasses the entirety of the audit execution by identifying and outlining the various steps and stages that will be followed during an internal audit. Auditors must plan and document their work to address the audit objectives, scope, methodology, fieldwork, findings, and allow for a rebuttal.

The audit process can be dynamic during the execution and auditors may adjust the process as work progresses or if sufficient evidence is lacking for an adequate finding. Any/all changes to the process must include appropriate documentation of any/all changes.

Annual Audit Plan

The audit team will submit an annual audit plan, based upon the calendar year, which will be approved by the chain of command, through the chief of police. Matters requested by command staff including risk assessment results, control, management related issues may be considered in the annual audit plan.

A copy of the annual audit plan will be published on the CSPD's internal and external PDMS websites. So as to allow for a sense of flexibility, the annual audit plan is subject to revisions and changes at any time and serves as a general roadmap for the upcoming year.

Follow-up Audits

The audit team or command staff may recommend a follow-up audit(s), as needed and based upon information discovered while conducting the audit and/or as a finding recommendation. A notification of the follow-up will be sent to the audited supervisor, after the finalization of initial audit report, along with a timeline for the follow-up audit(s).

The internal auditor will coordinate with the supervisor of the audited entity to set up the follow up audit schedule.

Special Audits

The chief of police, or other command staff member, with the chief's approval, may request a special audit in addition to the planned audits via the audit request format, attached below.

.55 Reporting Findings

Audit Reports

The internal auditor will be responsible for authoring an audit report at the conclusion of each audit/staff inspection. The report will detail findings, outcomes, and list recommendations for corrective actions deemed necessary for improvement.

The internal audit report will then be forwarded through and approved by the internal auditor's chain of command. The report will then be forwarded to the command staff officer of the audited entity for review, rebuttal, or commentary. The audit report and the rebuttal will then be forwarded to the chain of command, up to and including the chief of police.

Once reviewed and approved, the internal auditor will publish the report on either or both the internal and external PDMS websites, as deemed appropriate. The report will detail findings, outcomes, and list recommendations for corrective actions deemed necessary for improvement. Confidential information or information sensitive to CSPD will not be included or redacted as needed.

The resulting internal audit reports may also be utilized by other areas within CSPD as deemed appropriate, (e.g., for planning or training needs).

Reporting Non-Compliance

Any/all instances of non-compliance, whether corrected immediately or requiring a process overhaul, will be documented within the internal audit report and reported to the chief of police during a quarterly meeting unless immediate notification is deemed necessary.

Disagreements

Members of the audit team will have unrestricted access to communicate differences of opinions with auditors, findings, and/or recommendations. The final resolution will be documented in the internal audit report to ensure proper independence and objectivity are adequately maintained.

Quarterly Meetings

On no less than a quarterly basis, representatives from the compliance unit and the command staff officer of the audited entity will meet with the chief of police to discuss audit status, outcomes, and any new risk factors for consideration in upcoming audits.

.60 Collaboration with External Audits

CSPD personnel associated with an external audit may collaborate with other auditing entities outside the department (e.g., the City's Auditor's Office, other competent auditing authority, etc.). It is recommended that notice of such participation be provided to the compliance unit prior to the audit, for general awareness purposes.

.65 Audit Records

Retention

The internal auditor and the audit teams will comply with all local requirements concerning records retention periods, records destruction, archival preservation, records storage, and report submissions.

Handling

The audit team will not edit original records, falsify records, conceal records, destroy records in bad faith, exploit confidential information, or otherwise mishandle records.

Legal Requests

When a lawsuit is filed or it is reasonably anticipated one will be filed against the city of Colorado Springs, the department, or department personnel acting in their official capacity, or when an internal or governmental investigation is initiated, the audit team will ensure:

- All audit related information potentially relevant to the suit or investigation is preserved
- Potentially relevant records are not altered or concealed

Potentially relevant information is not inadvertently destroyed pursuant to document retention schedules or by routine computer operations or common computer settings, such as the automated deletion of emails.

.70 Training

The internal auditor will provide training to the audit teams on an as needed basis, depending on the complexity of the audit being conducted.

When an audit team is enacted to conduct an audit, the internal auditor will be responsible for training each member of the team prior to beginning the audit. At a minimum, the training will include an overview of the internal audit policy/procedures, the scope of the audit, and the measurables expected from the members of the audit team.

Attachments

[Audit Request](#)

[Internal Audit Notice](#)

NDA

[Statement of Independence](#)