
Oakland Police Department
Office of the Inspector General



4th Quarterly
Progress Report
October - December, 2018

Oakland Police Department
Office of Inspector General

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Introduction

OIG's 4th Quarterly Report covers two areas:

- 1) The Department's use and tracking of rental vehicles and;
- 2) An inspection of fire extinguishers and first aid kits in the Oakland Police Department's fleet of police vehicles.

Due to the Department's increasing use of rental vehicles and associated increases in cost over the past five years, the OIG initiated an audit of the use and tracking of rental vehicles. The Department uses rental vehicles for various special and investigative operations (i.e., *undercover surveillance operations, celebratory events and demonstrations*). There is an inherent risk associated with the use of rental vehicles, warranting strong internal controls to avoid misuse and minimize liabilities associated with accidents. However, the audit found weak controls for the use and tracking of rental vehicles, as well as the authorization process for payment of invoices.

Police officers are called upon to the scene of all types of emergencies. Departmental policy and procedures require police vehicles to be equipped with fire extinguishers and first aid kits to assist officers in administering first aid and protecting the public and property. In their daily work, they are often required to handle incidents involving injuries caused by vehicle accidents, assaults with deadly weapons, and caustic events. Although seldom, officers will be required to apply first aid for a long period while waiting for paramedic medical personnel. Occasions may arise in which police officers must have the tools necessary to assist them in performing their duties and fulfilling their obligations to the citizens of the community and to safeguard the officers. To ensure police officers are equipped to provide these essential aids during critical circumstances, OIG initiated an inspection of first aid kits and fire extinguishers. The inspection found deficiencies with first aid kits not being fully stocked and fire extinguishers not being serviced as required on an annual basis. The audit also identified the need to revise policy to include updated best practices and training, and to ensure the Department provides clear guidelines for maintaining and inspecting first aid supplies and fire extinguishers. The audit did not encompass the entire field of first aid. It reviews and emphasizes those critical tools necessary in common emergency situations. First aid kits and fire extinguishers are recognized as prominent safety equipment, utilized to safeguard the officers and the public during critical emergency circumstances.

Respectfully,



Angelica Mendoza
Lieutenant of Police
Office of Inspector General

Review of the Department's Use and Tracking of Rental Vehicles

By Lead Auditor Charlotte Hines and Contributors Kristin Burgess, MPA, CGAP, Police Performance Auditor Supervisor and OIG Commander Lieutenant Angelica Mendoza

Objectives

1. Determine what, if any, internal controls related to supervision, accountability mechanisms, and transparency are in place for the assignment and tracking of departmental rental vehicles.
 2. Examine the Oakland Police Department's Fiscal Services Division's processes to ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for vendor invoices.
 3. Compare rental vehicles budget to actual cost.
- ✘ The Fiscal Services Division does not consistently ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for the vendors' invoices.
 - ✘ Only two units have internal systems in place related to the assignment and tracking of rental vehicles.

Background

The amount of money the Department spent on rental vehicles increased significantly between 2013 and 2017. In 2017, due to concerns regarding the total cost of rental vehicles and the challenges in obtaining invoice authorization for payments, the Fiscal Services Division conducted a review that indicated a need for revisions and improvements to the overall management of rental vehicles. In August 2018, OIG initiated an audit of the Department's use of rental vehicles to assess current practice and policies.

Summary

Due to the lack of a Department-wide policy, the Department's practices for the use and tracking of rental vehicles are inconsistent between units.

Key Weaknesses

- ✘ There is no Department-wide policy regarding the assignment, tracking and use of rental vehicles.

Key Recommendations

- ✓ The Department should create Department-wide policies and procedures, providing clear guidelines for rental vehicle management and processes.
- ✓ The Department should assess the need and use of rental vehicles, including determining whether it is more cost effective to purchase additional vehicles versus renting vehicles.
- ✓ The Department should consider centralizing the rental vehicle process to one unit or create a set of standard procedures and time intervals for how and when units should communicate any changes and/or issues that arise.

References

- Bureau of Field Operations Policy 08-01, "Rental Cars", dated February 6, 2008
- Department General Order I-2 "Assignment, Servicing, and Repair of Police Vehicles", dated April 17, 2000
- Special Order 8971, "Take Home Vehicle Authorization" dated April 7, 2014

Overview

To supplement its fleet of police vehicles and for operational necessities, the Oakland Police Department utilizes rental vehicles for various special and investigative operations (i.e., *undercover, surveillance operations, celebratory events and demonstrations*). Risks are inherently associated with any operation of vehicles, such as accidents and misuse, regardless of whether they are city-owned police vehicles or rental vehicles used for law enforcement operations.

Twelve units in the Department utilize rental vehicles. The Department has approximately 38 rental vehicles at any given time, and in Fiscal Year 2017-2018, spent nearly \$500,000 on these vehicles. While the Department has an internal centralized tracking system and policies guiding the use of city-owned vehicles, there is no Department-wide policy for the use of rental vehicles, leaving the Department vulnerable to increased liability and costs. The only policy regarding the use of rental vehicles is specific to the Bureau of Field Operations, which few Commanders interviewed knew about, and which does not cover the units that rent the most vehicles. In addition, of all 12 units that utilize rental vehicles, only two were identified as having a tracking system for rental vehicle assignment and use.

The Department contracts with two rental vehicle companies, Enterprise Inc. and Pacific Car Rental Co. (*also known as GKB35 Inc.*). The City of Oakland participates in a cooperative purchasing agreement between the State of California and Enterprise Rent-A-Car; hence, the terms of the agreement are negotiated by the State of California. The Co-Op agreement includes provisions such as follows:

- *Specific vehicles eligible for renting*
- *Base rate that can be charged (short term and long term)*
- *Unlimited mileage*
- *No late, no show, energy recouping and/or cancellation fees*
- *Rates not subject to blackout dates, or minimum rental period*

Pacific Car Rental Co. is a local rental car company located in the City of Alameda. The City has a Blanket Purchase Agreement with Pacific Car Rental Co., which includes the types of vehicles available to rent and the associated rates. Per the Fiscal Services Manager, the Blanket Purchase Agreement expired on December 31, 2018, and is currently in the rebidding process.

Background

The purpose of utilizing rental vehicles is to support and facilitate undercover and tactical operations and strategies that require members to work in a covert undercover capacity. In August 2018, OIG initiated an audit of the Department's rental vehicles. To ascertain the current practices and processes of rental vehicles utilized by the Department, OIG convened an entrance conference with the Bureau of Services Deputy Director, the Fiscal Services Division Acting Manager and the Ceasefire Division Captain and conducted several interviews with OPD Personnel (See Table 1).

Table 1: List of Personnel Interviewed

Interview	Personnel
1	Fiscal Services Division: Accounts Payable Clerk
2	Intelligence Unit: Sergeant
3	Bureau of Field Operations (BFO 2): Area 4 Captain, Area 5 Lieutenant, and Bureau of Services (BOS) Fleet Operations Coordinator
4	Bureau of Field Operations (BFO 1): Area 1 Captain, Area 2 Captain, and Area 3 Sergeant
5	Alcohol Beverages and Tobacco (ABAT): Sergeant and ABAT Officer
6	Criminal Investigations Division (CID): Sergeants (2)
7	Police Information Technology Unit: Acting Sergeant
8	Bureau of Services (BOS): Fleet Operations Coordinator
9	Fiscal Services Division: Manager, Acting Manager, Accounts Payable Clerk, and Contract Technician
10	Internal Affairs Division (IAD): Commander

There are 12 units in the Department that rent vehicles, with up to 38 authorized vehicles rented Department-wide at any given time (See Table 2).

Table 2: Rental Vehicles per Unit	
Unit	# of Vehicles
Alcoholic Beverages and Tobacco (ABAT)	1
Bureau of Field Operations 1, Area 1	2
Bureau of Field Operations 1, Area 2	2
Bureau of Field Operations 1, Area 3	2
Bureau of Field Operations 2, Area 4	2
Bureau of Field Operations 2, Area 5	3
Ceasefire Division	21
Criminal Investigations Division	3
Internal Affairs Division	1
Intelligence Unit	1
Total Vehicles	38

The Ceasefire Division is assigned and authorized most rental vehicles. Ceasefire is a data-driven violence-reduction strategy coordinating law enforcement, social services, and the community. The major goal of the Ceasefire Division is to reduce gang/group-related homicides and shootings. Ceasefire seeks to combine the best of community energies, social services, and strategic law enforcement to reduce gun violence associated with gangs/groups far more effectively than these entities operating alone. Additional units, who are also authorized and assigned the use of rental vehicles, include the

Alcoholic Beverages and Tobacco (ABAT) Unit,¹ the Intelligence Unit, the Bureau of Field Operations (BFO 1 & 2), the Internal Affairs Division (IAD) and the Criminal Investigations Division (CID).

Rental vehicles are used for investigative activities such as surveillance, undercover operations and/or intelligence gathering, for which a marked police vehicle would be undesirable, hindering the ability of discreetly completing investigative goals effectively.

In addition, OPD's Fleet Coordinator, at the direction of an OPD Logistics or Unit Commander, periodically rents vans for operations such as celebratory events and/or demonstrations. The vans are primarily used to transport large numbers of personnel in a rapid and efficient manner throughout the City. Vans are typically rented for a duration of a few days up to several weeks at a time, depending on the logistical needs of each event.

On occasion, the Department also rents vehicles for travel related activities (i.e., attending trainings in other states). Per an email from the City Administrator's Office dated September 5, 2018, renting a vehicle for travel should only be considered for extraordinary situations and requires approval from the City Administrator. The Department updated its Travel Request Form (TF 796) and associated Guidelines in December 2018. The updated guidelines require pre-approval for all rental vehicles used for travel (expenses are not reimbursed without pre-approval), a memorandum justifying the rental, and the use of Enterprise Rental Co. The guidelines also specify the circumstances in which vehicles can be rented for travel and which vehicles can be rented (least expensive option).

During interviews with the Bureau of Field Operations 1 and 2 Captains, Lieutenant and Sergeant, an ABAT Sergeant and Officer, the CID Sergeants and the Ceasefire Division Captain, the OIG Lead Auditor was informed that when officers need to rent vehicles, whether from Enterprise or Pacific Rental Car Co., the officer must provide their name and serial number to the rental car agency representative. After the identified operation/project is concluded, the rental vehicle is returned. Both Enterprise and Pacific Car Rental Co. generate monthly invoices based on each Officer's rental vehicle usage (i.e., monthly, weekly or daily). If the vehicle is rented for at least one month, the OPD is charged a monthly base rate. If the vehicle is rented for less than a 30-day period, the OPD is charged a weekly and/or daily rate from the date checked out to the date of return. For example, if an officer rents a vehicle for a period of 24 days, the OPD will be charged for 3 weeks and 3 days. Both vendors send the invoices directly to the OPD's Fiscal Services Division, Accounts Payable Unit, for payment.

Per the Department's Police Information Technology Unit Acting Sergeant and Fleet Coordinator, rental vans used for operations such as celebratory events and demonstrations are solely authorized to be rented from Enterprise. When rental van(s) are needed, the Logistics or Unit Commander, depending on the operation, places a request, in writing, with the Fleet Coordinator for a specific number of vans necessary. The Fleet Coordinator is responsible for submitting the request for vans to Enterprise. Enterprise delivers all vans as requested to the designated Department location. Upon delivery of each van, the Enterprise representative meets with the Fleet Coordinator, and/or designee, who accepts each van and signs the van contract(s). After the operation, the Fleet Coordinator acquires approval from the operation's Logistics or Unit Commander to return the van(s) back to Enterprise. The Fleet Coordinator then removes all Department property from each van. Rental charges conclude when Enterprise is notified by the Fleet Coordinator that the van(s) are no longer needed by the Department. Enterprise

¹ The Alcoholic Beverages and Tobacco (ABAT) Unit conducts investigative operations involving the transportation of minors assisting in its' operations.

will generate an invoice for each van rented and send it to OPD's Fiscal Services Division, Accounts Payable Unit, for payment. The invoice includes the number of days each van was rented.

Policies and Procedures for the Assignment, Tracking and Use of Rental Vehicles:

Bureau of Field Operations Policy 08-01, titled *Rental Cars*, dated February 6, 2008:

Section II.A-B: states, *"Rental vehicles will be coordinated by the Support Operations Division's Special Operations Section. Only sworn members are authorized to operate the rental vehicles. All vehicle code sections and rules and regulations applicable to City-owned vehicles shall also apply to rental vehicles..."*

Section II.F: states, *"Rental vehicles shall only be driven in the Bay Area within an eighty (80) mile radius of the Police Administration Building (PAB). Members that require the use of a rental vehicle outside the eighty (80) mile radius shall get authorization from the Special Operations Section Commander."*

Section III: C-D states, *"The Special Operations Section Commander shall approve all rental vehicle exchanges. Only supervisors or commanders are only authorized to check out a rental vehicle."*

Department General Order (DGO) I-2, *Assignment, Servicing, and Repair of Police Vehicles*, dated April 17, 2000

Section I.B states, *"Vehicles Assigned to Other Units: Certain unmarked and miscellaneous vehicles shall be assigned to specific organizational units and shall be released by the unit supervisor or commander, who shall be responsible for establishing sign-out procedures and the [tracking] of vehicle usage records"*

Section II.B states, *"Vehicles Assigned to Other Units: Investigators and other persons using vehicles assigned to units outside of the Patrol Division shall follow sign-out and inspection procedures established by their unit commanders."*

Section II.D states, *"Keys: No member or employee shall keep a personal set of keys to any vehicle(s) unless authorized by the unit commander. All keys shall be turned in as is appropriate."*

Special Order (SO) 8971, *Take Home Vehicle Authorization* dated April 7, 2014 (Revision to DGO I-2 regarding take-home vehicles)²

² In Departmental General Order A-1, *Departmental Publications*, dated July 28, 2008, a Special Order of the Chief of Police (SO) is defined as a directive from the Chief of Police which sets forth official policy modifications until such revisions can be incorporated into a permanent departmental directive (i.e., Departmental General Order, Training Bulletin, Report Writing Manual, or Manual of Rules). An SO that modifies a specific permanent departmental directive shall terminate when incorporated into the referenced directive unless otherwise designated.

Section H.1.j: states, “Only the following personnel are authorized to take an assigned Departmental vehicle home on an on-going basis: ...Intelligence Division Personnel (Department-owned undercover vehicles).”

Section H.2: states, “All other marked or unmarked vehicles (including motorcycles), assigned to an individual or unit, shall not be taken home unless authorized as specified in Part 3 below.”

Section H.3: states, “Division commanders may authorize subordinate personnel to take home a Department vehicle: a) in an emergency, b) as a convenience to personnel in order to conduct Departmental business or to attend Departmental training or c) when the member is assigned to an investigative call-out rotation (i.e. Homicide, Fatal Accident Team, Force Investigation Team, etc.)”

Accounts Payable Processing Policy

Per Administrative Instruction (AI) 1304: titled *Accounts Payable Processing Policy* dated February 1, 2013³, Section IV (Page 5), the Manager reviews the payment request form and supporting documentation. The Manager shall ensure that services were rendered prior to approving and signing the payment request form. Subsequently, the completed documents are forwarded to the Controller’s Office-Accounts Payable Section for processing.

Prior Review of Rental Vehicle Expenditures

In 2017, the Department’s Fiscal Services Division reviewed rental vehicle expenditures over a four-year time-period (2013-2017) and made recommendations to reinforce internal controls. The Fiscal Services Manager and Accounts Payable Clerk had concerns about the increase in cost of rental vehicles between 2013 and 2017, and the lack of tracking on the part of Commanders responsible for rental vehicles. The Accounts Payable Clerk created a PowerPoint presentation titled *Oakland Police Department Vehicle Rental Expenditures* which included a chart of costs (See Table 3), and the Fiscal Services Manager discussed the findings and provided a copy of the PowerPoint presentation to Commanders in executive staff meetings. Fiscal Services made the following recommendations in the PowerPoint presentation for Commanders:

- **Recommendation #1**
Increase the budget for rental cars based on actuals or reduce the number of vehicles rented.
Increasing the budget will require removing funds from other projects and priorities

³ Administrative Instruction 1304 purpose is to establish policies and procedures in accounts payable processing and approval; to define roles and responsibilities of all parties involved in processing vendor payments; to provide guidance and assistance to City Departments to pay invoices timely while ensuring the accurate recording of data in the City’s financial system and to comply with the Internal Revenue Service (IRS) 1099-MISC reporting requirements for independent contractors.

Status

Per the Fiscal Services Manager, the budget for rental vehicles increases throughout the fiscal year, based on the usage. The Fiscal Services Manager provided written documentation indicating the Departments' internal beginning budget for Fiscal Year 2017-2018 was **\$459,000** and the Departments' internal beginning budget for Fiscal Year 2016-2017 was **\$258,000**. This was a 78% increase for Fiscal Year 2017-2018.

- **Recommendation #2**

Require the person renting the vehicle to provide his/her name and serial number (not his/her commander's name). This action will provide more accountability.

Status

Per the Fiscal Services Account Clerk, the Fiscal Services Division requested Enterprise to ask for the renter's first name, last name, serial number, and "*organization number*"⁴ almost two years ago. She further stated that since then, there has been inconsistent compliance because invoices do not consistently include this information and do not always include the accurate organization number.

- **Recommendation #3**

Remove the ability to rent premium and luxury vehicles from our account. Premium vehicles include large SUVs (Tahoe, F150, Suburban, etc.) that are more expensive than standard vehicles.

Status

Per, the Fiscal Services Account Clerk, this recommendation was implemented October 5, 2017. The Account Clerk sent a detailed email to the branch manager at Enterprise Rental Car, stating that Oakland Police Officers are not authorized to get a car above a standard SUV. Therefore, officers are no longer able to rent luxury and premium vehicles.

- **Recommendation #4**

Include the Assistant Chief on Monthly invoice approval emails. This will help Fiscal Services receive timely responses from Commanders.

Status

Per, the Fiscal Services Manager, due to various OPD personnel and organizational changes, sending the invoices to the Assistant Chief is no longer occurring.

- **Recommendation #5**

Re-establish Departmental procedures for renting vehicles.

⁴ Organization number represents the Unit the renter works in and the budget to which the cost of the rental vehicle will be charged (See Table 2 above for complete list of units).

Status

Per the Fiscal Services Account Clerk, no formal policies or procedures were established. However, some units established their own rules.

A review of the Fiscal Services Division found an increase of 81% in rental vehicle expenditures between 2013 and 2017 (See Table 3).

Table 3: Rental Vehicle Expenditures Fiscal Year 13-14 through 16-17

	Enterprise	Other	Total
FY 13-14	\$330,533.91	\$48,541.58	\$379,075.49
FY 14-15	\$584,241.88	\$81,748.24	\$665,990.12
FY 15-16	\$457,223.35	\$131,373.47	\$588,596.82
FY 16-17	\$531,160.32	\$153,719.05	\$684,879.37

Objective and Scope

The objective of the audit was to determine if the Department has the appropriate internal controls in place to ensure rental vehicles are properly assigned, tracked and used by police officers. In addition, the audit examined the approval of rental vehicle invoices. Lastly, the audit compared the rental vehicle budget to actual costs. The audit covered the time-period of July 1, 2017 through June 30, 2018.

Methodology

The policies and procedures regarding rental vehicles are outlined within the Bureau of Field Operations (BFO) Policy 08-01, titled *Rental Cars*, dated February 6, 2008. In Section II.B, the policy states, “*All vehicle code sections and rules and regulations applicable to City-owned vehicles shall also apply to rental vehicles.*” Departmental General Order (DGO) I-2, *Assignment, Servicing, and Repair of Police Vehicles*, dated April 17, 2000, includes guidelines on the assignment and tracking of City-owned vehicles.

The auditor reviewed both policies and established criteria that would ensure there was supervision, accountability mechanisms, and transparency for assigning and tracking rental vehicles. Although the BFO has established policies and procedures for rental vehicles, the auditor sought the same level of supervision, accountability mechanisms, and transparency for assignment and tracking systems for

rental vehicles created by units outside of the Bureau of Field Operations (BFO). Therefore, all identified 12 units authorized and assigned rental vehicles were held to the same standards.

Criteria Used for Assignment and Tracking System that Includes Supervision, Accountability Mechanisms, and Transparency

To assess assignment and tracking procedures for rental vehicles, the auditor sought documented evidence of the following policy and procedures requirements⁵:

1. Has a supervisor or commander established sign-out procedures and tracking of vehicle usage records? The auditor, based on this requirement, sought documentation that included the following information:
 - a. Date and time vehicle checked out
 - b. Mileage outbound
 - c. Officer's name and serial number using rental vehicle
 - d. Officer's assignment (at minimum whether assignment was surveillance or undercover, buy/bust operation, etc.)
 - e. Make, model, and year of rental vehicle
 - f. Date and time vehicle checked-in
 - g. Mileage inbound
 - h. Supervisor's name and serial number
 - i. Signature of Commander and his/her serial number or if the assignment and tracking documentation is electronic, and is maintained by someone lower in rank than a Commander, the auditor sought documentation that substantiated a Commander received the assignment and tracking documentation for his/her review
2. Are only police officers assigned to operate the rental vehicles?
3. Does the Commander approve all rental vehicles for police officers assigned to use rental vehicles?
4. Are vehicles being tracked to ensure they are not taken home unless authorized? If so, who authorizes it?
5. Are rental vehicles being driven in the Bay Area within eighty (80) mile radius of the Police Admin Building (PAB)?

To determine whether a unit's assignment and tracking system for rental vehicles met the above criteria, the OIG's Lead Auditor and Audit Unit Supervisor conducted an entrance conference and interviewed various OPD personnel to determine the respective unit's system.⁶ If a supervisor or commander had documented sign-out procedures and tracking of vehicle usage records for rental vehicles, the auditor considered the Unit to have met all five of the above policy and procedures requirements.

⁵ For a list of policy and procedure requirements, see the "Background" section of this audit.

⁶ For a list of personnel interviewed, see the "Background" section of this audit.

Criteria Used to Examine OPD Commanders Approval Process of Invoices for Rental Vehicles Used by Their Respective Subordinates

The OIG's Lead Auditor and Audit Unit Supervisor interviewed the Fiscal Services Division Acting Manager and Accounts Payable Clerk, and inquired about their process in place to ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for the vendors' invoices. Because police officers from the 12 units use the rental vehicle services, the auditor sought documented evidence that respective Commanders were authorizing payment of the invoices based on their subordinates' use. In addition, as a form of back-up paperwork to substantiate services were rendered, the auditor sought documented evidence of each Unit Commander's established sign-out procedures and tracking of vehicle usage records attached to the authorization for payment.

Criteria for Comparing Rental Vehicle Budget to Actual Costs

To compare the OPD's rental vehicle budget to actual costs, the auditor reviewed OPD's annual budget amount for rental vehicles for Fiscal Year 2017-2018 and compared the actual invoices for that same period to evaluate whether or not the OPD was overspending or within its budget.

Findings

Finding #1

There is no Department-wide policy regarding the assignment, tracking and use of rental vehicles.

The Department lacks a Department-wide Departmental General Order (DGO) outlining policies and procedures to ensure that management and oversight of rental vehicles are adhered to in a uniformed and consistent manner to mitigate misappropriation and risk. Although rental vehicles are used in the daily operations of several units throughout the Department, there is no Department-wide DGO outlining policies and procedures for their use. The OIG did verify that the Bureau of Field Operations (BFO) does have a Policy and Procedure Manual (Policy 08-01)⁷ concerning rental vehicles, dated February 6, 2008. This policy was implemented over ten years ago and is only applicable to units assigned to BFO. It should be noted that this is not a Departmental General Order. Most Departmental rental vehicles are assigned to the Ceasefire Division, which is independent of the Bureau of Field

⁷ According to BFO Policy 08-01 on rental cars, the purpose of utilizing rental vehicles is to support and facilitate undercover and tactical operations and strategies that require members to work in a covert undercover capacity. The policy includes guidelines on the coordination of rental vehicles, authorized drivers, proper usage and storage, travel distance and insurance applicable to rental vehicles.

Operations and is categorized as a Specialized Unit. Additionally, most BFO Commanders interviewed for this audit were unaware of this policy, suggesting their subordinate officers, supervisors and commanders may not be adhering to its directives.

Contrary to BFO Policy 08-01, any officer can check out a rental vehicle upon approval from their Division or Unit Commander. The policy requires that the Special Operations Section (SOD) Commander shall approve all rental vehicle exchanges and that only Supervisors or Commanders are authorized to check out a rental vehicle. This is an example of inconsistent practices due to the lack of a Department-wide DGO outlining policies and procedures ensuring that management and oversight of rental vehicles are adhered to in a uniformed and consistent manner. Lack of a Department-wide DGO leaves the Department vulnerable to:

- Unauthorized users renting vehicles
- Unauthorized use of rental vehicles
- Inability to track rental vehicle assignment
- Inability to track length of rental period and mileage driven
- Inability to reconcile Rental Car Agency invoices and identify errors
- Lack of awareness of changes to contract provisions
- Insurance Cost and Liabilities' applicable to Rental Vehicles

Currently, each unit is handling its rental vehicle usage independently, with only a few verified internal accountabilities and controls. With no Department-wide policy in place, the practices amongst units are inconsistent and there are no standard procedures.

Additional Observations

OPD removed active policy from Power DMS without informing its personnel.

During the audit, the auditor noted that Bureau of Field Operations Policy 08-01, titled *Rental Cars* dated February 6, 2008, authored by a former Deputy Chief of Police, remains active; however, such document was not located in OPD's Power DMS.⁸ According to Departmental General Order A-1, titled *Departmental Publications*, dated July 28, 2008, Section I.E.3, organizational unit policy and procedures remain in effect until revised, superseded, or canceled. Based on DGO A-1, the policy remains active until canceled. Therefore, the Department must ensure all Bureau of Field Operations employees have access to the policy, and/or revise, supersede or cancel the policy if it is no longer needed.

Finding #2

Only two units, Ceasefire and BFO 1 Area 2, have internal unit systems in place related to the assignment and tracking of rental vehicles.

⁸ "Power DMS" is the Department's policy and procedures repository, housing all current Departmental policies, procedures, and training bulletins.

In determining whether a unit's assignment and tracking system for rental vehicles includes internal controls for supervision, accountability mechanisms and transparency related to the assignment and tracking of rental vehicles, the audit indicated that only the Ceasefire Division and BFO 1, Area 2 have documented evidence of sign-out procedures and a tracking system for rental vehicles.

The auditor reviewed a copy of the Ceasefire Captain's written and implemented rental vehicle directives, titled *Ceasefire Division Directive, Rental Vehicles*, which outlines the rules and expectations regarding rental vehicle use by Ceasefire teams. The directives address on and off duty responsibilities, eligible drivers of the rental vehicle and the consequences for not following the directive. The Ceasefire Directive states, "*The guidelines and expectations regarding rental vehicles shall be adhered to at all times.*" Although these directives are not codified in formal policy, they do provide officers within the Division with expectations and guidance on the use of rental vehicles. These directives were implemented approximately December 2017, and provide an internal system for tracking rental vehicle assignments that further assist the Fiscal Services Division with reconciling invoices. Per the Ceasefire Captain, at that time, all current members received the directive during team building exercises. All new members to the unit receive the directive at the new employee orientation during the roles and responsibilities training. However, the Ceasefire Captain had no records indicating which subordinates received the training and the date the training occurred.

In addition, the auditor received and reviewed a copy of the Ceasefire Captain's tracking of vehicle usage records. Upon reviewing the records, the auditor noted that the Commander keeps track of each police officer who is assigned a vehicle, along with the police officer's squad assignment. The tracking sheet also includes the make, model, license plate and mileage of the rental vehicle assigned to a police officer.

The Lead auditor also received and reviewed a copy of the BFO 1, Area 2's tracking of vehicle usage records (*SRS 2U/C Vehicle Sign out Sheet* and *SRS II Rental Car Mileage Tracking Form*). Upon reviewing the records, the auditor noted that the BFO 1, Area 2 Captain keeps track of each police officer assigned a vehicle. In addition, he tracks the make, model and mileage of the rental vehicle assigned to a police officer. Per the BFO 1, Area 2 Captain, although his Area has no formal directives or documented training regarding the vehicle rental process, depending on approval of operational need, he stated that directions are given by a BFO 1, Area 2 Commander or Supervisor when, and if an officer is instructed to rent a vehicle.

During the interviews with personnel representing the other 10 units, the audit indicated that:

- they do not have an internal system in which a supervisor or commander documents sign-out procedures and/or tracking of vehicle usage records, and
- the Special Operations Division Commander was not aware of BFO Policy 08-01, and is not coordinating the oversight of the rental vehicle process.

Additional Observations

The OPD has not established policy regulating who is assigned a take home rental vehicle and for what reason(s).

The Department's policy, DGO I-2, that regulates vehicles (i.e., patrol and undercover vehicles) owned by the City of Oakland was revised via Special Order 8971 on April 7, 2014, and explicitly states who can take Department-owned vehicles home and under what conditions. Intelligence Unit personnel are authorized to take home Department-owned undercover vehicles. In addition, the policy states:

"Division Commanders may authorize subordinate personnel to take home a Department vehicle: a) in an emergency, b) as a convenience to personnel in order to conduct Departmental business or to attend Departmental training or c) when the member is assigned to an investigative call-out rotation (i.e. Homicide, Fatal Accident Team, Force Investigation Team, etc.)."

However, there is no policy that specifically states whether or not rental vehicles are authorized to be taken home by officers, nor any guidelines as to when a take home rental vehicle would be appropriate. During the audit, the Lead Auditor was informed that Ceasefire Division officers and Intelligence Unit officers are authorized to take rental vehicles home on a regular basis. The reason given was due to the type of work these units perform. The officers assigned to these units are often required to travel to other cities and may get called back during off-duty hours, and in some cases, are required to conduct investigative functions in the middle of the night with limited notification. Therefore, they need to have a work vehicle accessible always to travel to where they are operationally needed, which is not always in the City of Oakland.

Some rental vehicles are driven more than an 80-mile radius of the Police Administration Building.

The BFO policy 08-01 on rental vehicles prohibits driving rental vehicles more than an 80-mile radius from the Police Administration Building, unless authorized to do so. The BFO Commanders interviewed for this audit were unfamiliar with BFO 08-01, but did indicate that they were not tracking mileage. The Ceasefire Division and Intelligence Unit are independent of the BFO, and their officers drive further than 80 miles from the Police Administration Building, depending on the operational needs.

Finding #3

The Department does not have an adequate tracking system for rental vans used for special operations.

Fleet Operations, which only rents vans, currently keeps a spreadsheet of all vans rented. However, the spreadsheet only includes the date rented, license plate number and a brief comment if any unusual circumstance exists upon delivery (i.e., LF/LR lights not working, R/R door dent – existing damage,

driver's side window will not roll up, returned due to strong urine order, etc.), or the van wasn't used (See Appendix 1). The current spreadsheet does not provide enough information to sufficiently track the assignment and use of the vans. At a minimum, the assignment and tracking documentation should include the following:

- a. Reason for request (i.e., May Day protest, other protests)
- b. Date of request
- c. Date vans received
- d. Van License #
- e. Inspection results upon receipt of van
- f. Unit/Driver assigned (including name and serial #)
- g. Day/Time van checked out
- h. Day/Time van checked in
- i. Date van returned (keys only)

Adding the information above will provide adequate supervision, accountability mechanisms and transparency regarding the assignment and tracking of the rental vans.

Finding #4

The Fiscal Services Division does not consistently ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for the vendors' invoices.

Administrative Instruction (AI) 1304 titled *Accounts Payable Processing Policy* dated February 1, 2013, Section IV, requires the Fiscal Services Division Manager, or her designee, to ensure that services were rendered prior to the approval and signing of the payment request form for processing. The Lead Auditor and Audit Unit Supervisor met with the Fiscal Services Division Manager and Accounts Payable Clerk, and the Lead Auditor inquired about their process in place to ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for the vendors' invoices. During the interview on August 27, 2018, the Accounts Payable Clerk stated, *"Invoices are received monthly from Enterprise, Inc. and irregularly⁹ from Pacific Car Rental. Invoices are separated by unit and scanned copies are sent as an email attachment for approval by the appropriate Commander and then paid regardless of whether or not a response is received from the approval request email."* However, in an email dated September 19, 2018 from the Accounts Payable Clerk, she stated that she has not been emailing the scanned invoices for approval by the appropriate Commander for the past few months due to challenges in deciphering organizational codes that reflect the officers' assignments.

Based on the responses from the Accounts Payable Clerk, the audit indicates that the Fiscal Services Division does not consistently ensure services are rendered prior to approving and signing the payment request form and authorizing payment of the vendors' invoices. Except for the Ceasefire Captain, all other Commanders that were interviewed stated that it has been some time since they have received an

⁹ For example, Pacific Car Rental Co. sometimes sends three invoices for three different months in one mailing.

“Okay to Pay” authorization request email. After a follow-up meeting with the Fiscal Services Division on February 14, 2019, the Accounts Payable Clerk sent OIG copies of emails requesting “Okay to Pay” approval for November 2018 invoices from the respective Commanders. A response was received from each Commander contacted.

The Fiscal Services Division cannot confirm the accuracy of the invoices, since they are not the ones renting or using the rental vehicles. Therefore, it is necessary for the Commanders in charge of the rental vehicles to confirm the accuracy of the invoices and authorize payment.

Because police officers from the 12 units use the rental vehicle services, the auditor sought documented evidence that respective Commanders were authorizing payment of the invoices based on their subordinates’ use. Subsequently, the Lead Auditor conducted a review of processed payment request forms and invoices for Enterprise, Inc. and Pacific Rental Car from July 1, 2017 to June 30, 2018 to ascertain if the invoices had any documented authorization to pay by the respective Commanders (i.e., a signature, attached email, etc.).

Upon review of 455 invoices (420 Enterprise, 12 Pacific Car Rental Co. and 23 Travel invoices for Enterprise), the audit revealed that only 75 (16%) of the invoices included documentation from Commanders authorizing payment, and 22 (29%) of the 75 invoices approved for payment were for travel. There was only one invoice for a travel rental vehicle that did not indicate authorization for payment. For the 245 invoices for Ceasefire Division rental vehicles, the auditor was unable to determine authorization. Ceasefire maintains a spreadsheet of all officers who are assigned rental vehicles, which the Fiscal Services Division uses to confirm the accuracy of invoices and as an authorization to pay. However, the auditor was unable to reconcile the spreadsheet with the invoices.

For all other units renting vehicles, there was no documented authorization for payment for 29% of the invoices (See Table 4 below for detailed results of review).

Table 4: Invoice Authorization for Payment Processing

"Okay to Pay" Authorization	Enterprise						Pacific Car Rental		All Invoices
	Travel	%	Ceasefire Division	%	All "Other" Units/Divisions	%	Pacific Car Rental Invoices	%	%
Yes	22	96%			53	13%			16%
None	1	4%			122	29%			27%
*UTD			245	58%			12	100%	57%
	100%		100%				100%		100%
Total Invoices	23		420				12		455

*UTD (Unable to Determine)

Commanders responsible for rental vehicles are not complying in the authorization of invoices for the payment process. The lack of compliance forces the Fiscal Services Division to submit payment for charges for which they have no way to reconcile with actual use. In the past, Fiscal Services attempted to contact the responsible Commander for approval and authorization of payment of invoices; however, Fiscal Services received limited responses and resorted to paying invoices without the benefit of proper authorization. Payment of invoices without proper authorization subjects the Department to possible improper or erroneous payments, and possibly missed opportunities to identify any misappropriation or fraud.

Additional Observations

Although the documented authorization to pay invoices has been inconsistent, Fiscal Services has utilized the Ceasefire Division’s tracking sheet to assist in reconciling invoices.

During a meeting with the Fiscal Services Division Manager and Accounts Payable Clerk, the Lead Auditor asked if they used the rental car spreadsheet created by the Ceasefire Division Captain to pay the rental vehicle invoices. The Accounts Payable Clerk stated that she uses the spreadsheet as an authorization to pay, and only sends an email to the Ceasefire Division Captain if a police officer’s name is on an invoice, but not on the spreadsheet.

The Department is not reporting rental vehicle mileage to Enterprise in a timely manner.

Enterprise requires the Department to report the mileage for each rental vehicle at the end of each month, to process their monthly invoices. If mileage is not reported, Enterprise enters an estimated mileage so they can close out their invoices. The mileage they estimate is often inaccurate. While the estimated mileage does not negatively affect the billing charges, it does inaccurately report the actual use of the vehicle. Since many Commanders are not tracking mileage for the rental vehicles assigned to their units and the mileage listed on the invoices is inaccurate, there is no accurate accounting for use of the rental vehicles to identify and mitigate risk of misappropriation or misuse.

Finding #5

Pacific Car Rental Co. invoices are insufficiently detailed, increasing the risk of inaccurate charges.

Pacific Car Rental Co. invoices are insufficiently detailed, making it difficult for the Department to reconcile and identify errors, which could result in the City being over-charged. Unlike Enterprise invoices, Pacific Car Rental Co. invoices are vague and difficult to verify. The information included on the two companies’ invoices are as follows:

Pacific Car Rental Co. Invoices

Invoice Date	Invoice #
Vehicle Class / Type	Cost
Driver / Officer	License Plate #

Enterprise Inc. Invoices

Invoice Date	Invoice #
Vehicle Class / Type	Miles driven
Driver / Officer	Cost
Pick up Date	Unit
Return Date	Commander
Make/Model/Year	License Plate #

Pacific Car Rental Co. invoices provide minimal data about the vehicle. Although the vehicle license number, class/type, and description are included on the invoices, the length of rental and miles driven are not. Also, rather than provide the full name of the person renting the vehicle, only the first initial and last name are included on the invoice, which is problematic for common names. Due to the lack of detailed information on the invoices, the Department cannot easily reconcile who rented the vehicle and how long they had the vehicle.

Finding #6

The actual expenditures for rental vehicles in Fiscal Year 2017-2018 exceeded the Departments' internal beginning budget for rental vehicles.

The Department's Fiscal Year 2017-2018 internal beginning budget for rental vehicles was **\$459,000**. The actual rental vehicle expenses for Fiscal Year 2017-2018 (**\$490,571**), which OIG calculated from the monthly invoices, exceeded the budget by seven percent. However, the invoice totals for the audit period did not match the total amount spent recorded in the budget report. The budget report shows that actual expenditures for Fiscal Year 2017-2018 were **\$516,338**. Per the Fiscal Services Manager, the difference may be attributed to the fact that prior year invoices were paid in the first month of the new Fiscal Year.

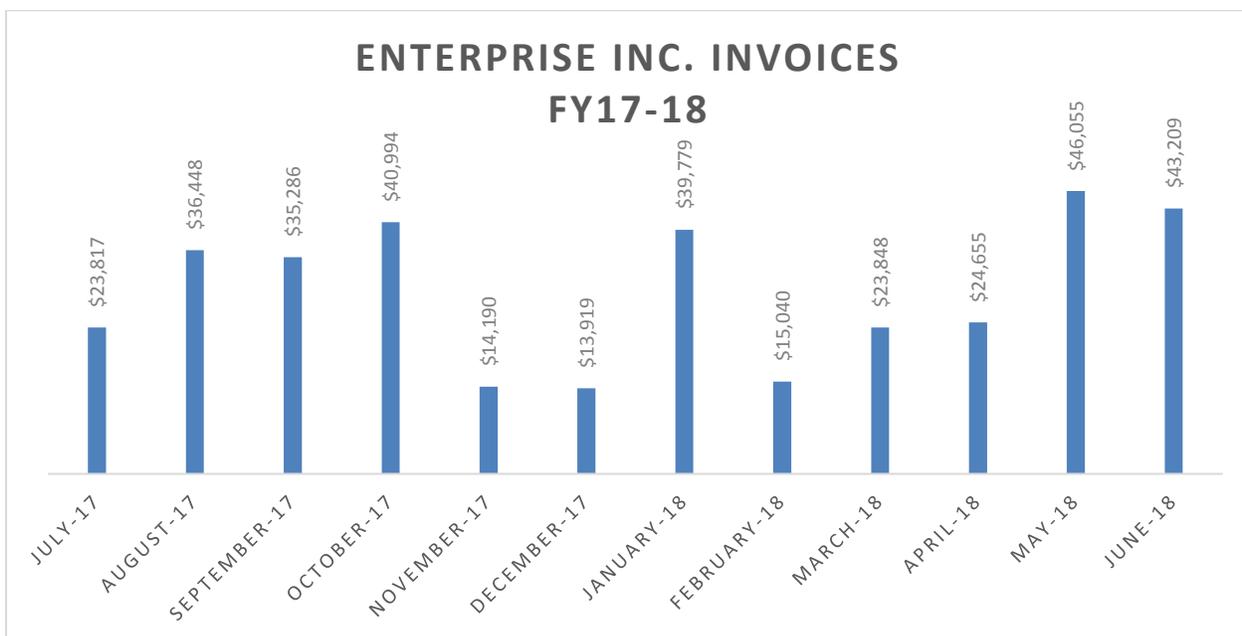
Table 6: Rental Vehicle Invoices for FY17-18

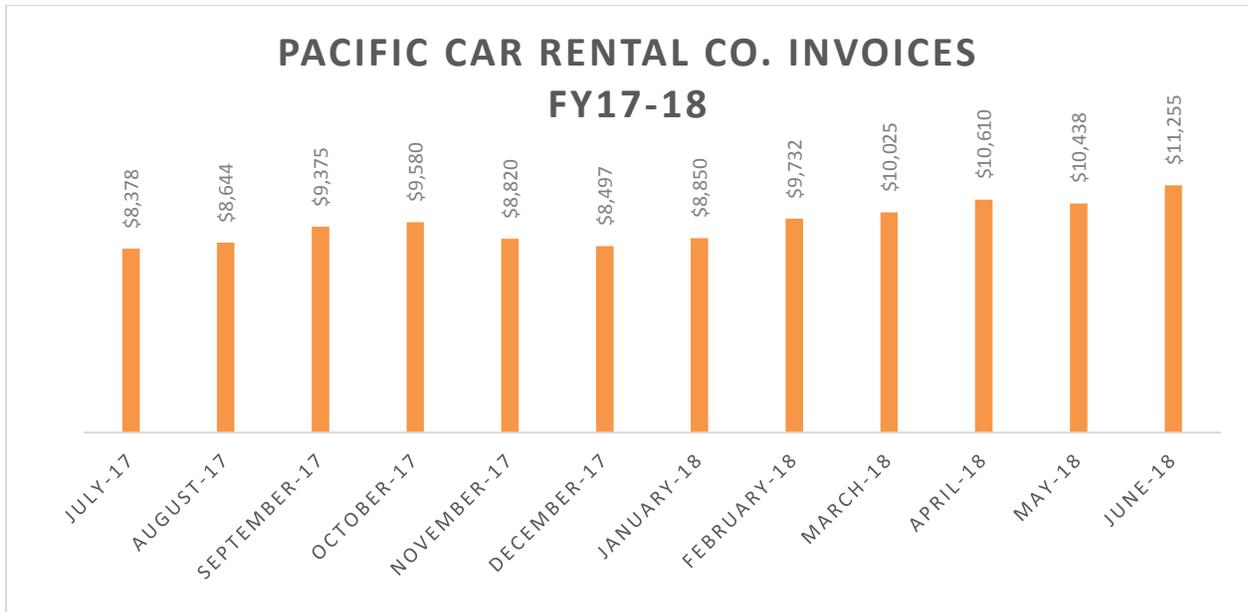
Invoice Type	Amount
Enterprise Invoices	\$372,435
Travel Invoices	\$3,933
Pacific Car Rental Co. Invoices	\$114,203
Total	\$490,571

There were 455 invoices paid (**Enterprise - 443 and Pacific Car Rental Co. - 12**). Both Enterprise and Pacific Car Rental Co. generate monthly invoices based on each Officer's rental vehicle usage (i.e., monthly, weekly or daily); however, Enterprise calculates its invoices on a per driver basis, which sometimes includes multiple vehicles on one invoice. For Fiscal Year 2017-2018, the Department paid **\$376,368** to Enterprise for Operations and Travel rentals.

Pacific Car Rental Co. also calculates its invoices monthly; however, all vehicles rented during each month are listed on one invoice. For Fiscal Year 2017-2018, the Department paid **\$114,203** to Pacific Car Rental Co. (20 different vehicles and 28 different drivers/officers).

Chart 1:





Recommendations

Recommendation #1

The Department should create Department wide-policies and procedures, providing clear guidelines for Rental Vehicle management and processes as soon as possible.

The policy must provide guidelines and directions for all Departmental personnel to comply with. Key procedural differences between Divisions should also be included. Standardized forms may be implemented to ensure Department-wide compliance and consistent application and usage among units. The standardized form at a minimum should include employee name and serial number, supervisor acknowledgement and date, and reason for use and/or assignment if applicable.

The policy should include, at minimum, the following processes:

1. Eligibility of Use
2. Conduct While Driving a Rented Vehicle
3. Rental Vehicle Approved vendors
4. Personal Use of Rental Vehicle
5. Accident Reporting
6. Monitoring and Tracking of Mileage and Assignment
7. Eligible Rental Vehicles
8. Take-Home Rental Vehicles
9. Rental vans for Fleet Operations

A Department-wide policy would allow for management continuity throughout the Department, ensuring that any possible risks and liabilities to the Department are identified and addressed in a timely manner.

Recommendation #2

Fleet Operations should create efficient procedures for requesting, managing and tracking its rental vans for special events.

The procedures should include, at minimum, the following criteria:

- Reason for request (i.e., May Day protest, other protests)
- Date of request
- Date vans received
- Van License #
- Inspection results upon receipt of van
- Unit/Driver assigned (including name and serial #)
- Day/Time van checked out
- Day/Time van checked in
- Date van returned (keys only)

A record of the Departments' van rental practice will provide a historical view of its needs, providing a basis for future rentals.

Recommendation #3

Fiscal Services should implement and codify efficient and effective invoice authorization procedures, including specific requirements to ensure that services were rendered prior to approving and signing the payment request form and authorizing payment for the vendors' invoices.

Payment of invoices should not occur without prior authorization from the appropriate Commanders to ensure that the Department is being fiscally responsible, and to ensure Commanders responsible for rental vehicles are accountable for their use. The procedures should address the timely reporting of accurate mileage.

Recommendation #4

The Department should consider centralizing the rental vehicle process to one unit, or create a set of standard procedures and time intervals for how and when units should communicate any changes and/or issues that arise during the normal course of business.

Centralization of the rental vehicle process would enable the Department to better control the use of rental vehicles, ensure that all policies are adhered to, provide updates when contract terms change, facilitate accountability and confirm that proper verification and authorization of services rendered is being consistently obtained. BFO Policy and Procedures 08-01 has established a centralized process

managed by the Special Operations Division; however, it is not currently being followed in its entirety. In addition, the process only applies to the Bureau of Field Operations and should be further codified so that the department can mitigate risk. Centralization should occur department-wide, which would also foster accountability and facilitate the verification and authorization of payment processes.

Centralization department-wide would increase efficiency as well as provide opportunities to recognize unusual changes or fluctuations in the Departments' rental vehicle activity.

Recommendation #5

The Department should assess the need and use of rental vehicles, including determining whether it is more cost effective to purchase additional vehicles versus renting vehicles.

The Department needs to conduct a complete review and assessment of the rental vehicle process; an in-depth analysis of the justification for the use of rental vehicles, the number of rental vehicles, and whether there are rental vehicles under-utilized and therefore not needed. In addition, the Department should conduct a cost analysis to determine if purchasing additional police cars is more cost effective than continuing to rent vehicles. If it is determined that rental vehicles are necessary for department operations, the Department should assess if the needs are attainable with one vendor.

Appendix 1: Fleet Operations Spreadsheet

DATE	LICENSE	
24-Apr-18	PAX-VAN	
24-Apr-18	52489L2	
24-Apr-18	7VLR615	LF/LR lights not working
24-Apr-18 Illinois	416789D	
24-Apr-18	52490L2	
24-Apr-18	7XWU229	
24-Apr-18	8ALK027	
24-Apr-18 Oregon	230HWH	DID NOT USE
24-Apr-18	7SXB026	
24-Apr-18 Georgia	GHSU26	
24-Apr-18 Arizona	CK22862	
24-Apr-18	7ZBD120	returned due to strong urine odor
24-Apr-18	7SIH224	
24-Apr-18	8BTM536	DID NOT USE
24-Apr-18	8ALK025	
24-Apr-18	7ZBE722	DID NOT USE

25-Apr-18	8DEJ564	
25-Apr-18	7ZXY163	
25-Apr-18	8BTM016	
25-Apr-18	7VLR596	DID NOT USE

26-Apr-18	8BTM597	
26-Apr-18	7VMR652	DID NOT USE

27-Apr-18	7LNP156	
27-Apr-18	7YFY463	DID NOT USE ***R/R DOOR DENT -EXISTING DAMAGE***
28-Apr-18 *****	7ZBD120	Urine van dropped off again - notified Ryan who will exchange van by
28-Apr-18	8DEJ471	***driver's side window will not roll up***
28-Apr-18	7FTB505	
28-Apr-18	8AXX219	
0		
30-Apr-18	989JCV	
30-Apr-18	7ZLH252	
30-Apr-18	7SIY451	
30-Apr-18	7VIJ679	
30-Apr-18	7TXH157	DID NOT USE

Inspection of Departmental Vehicles for First Aid Kits and Fire Extinguishers

By Lead Auditor Lieutenant Rachel Van Sloten and Contributing Auditors Lieutenant Angelica Mendoza and Police Performance Auditor Rebecca Johnson

Objective

Determine whether Oakland Police Department vehicles assigned to the Bureau of Field Operations, the Bureau of Investigations, and the Bureau of Services contain a fully stocked First Aid kit and a fire extinguisher that has been serviced within a year or less.

Background

The Oakland Police Department, via Departmental General Order I-2, requires its police officers to ensure that there is a fully supplied First Aid kit (including latex gloves and a CPR mask to protect against blood-borne pathogens) and a fire extinguisher in his/her vehicle.

Key Findings

- ✘ Of the 286 vehicles inspected, 218 (76%) of them contained First Aid kits that were deemed fully stocked.
- ✘ Only 101 (35%) of the 286 vehicles inspected contained fire extinguishers that had been serviced within a year or less.
- ✘ Departmental General Order I-2 references a Bureau of Field Operations Policy and Procedure regarding field vehicle inspections that is not accessible and therefore cannot be adhered to by the intended audience, district sergeants in the Patrol Division.
- ✘ In practice, the Deficiency Notification Card, used to report missing, damaged, or deficient equipment, is not used by the Fleet Unit personnel.

- ✘ Police Officers are not equipped with tools in their First Aid kits to handle trauma based injuries.

Key Recommendation

- Departmental General Order I-2 was last revised April 17, 2000, almost 19 years ago. It is outdated, and needs to be revised to incorporate current best practices. (For a list of all recommendations, please review the **Findings and Recommendations Section** at the end of this audit.)

References

1. California Code of Regulations, Title 22, Social Security, Division 9. Prehospital Emergency Medical Services, Chapter 1.5, *First Aid and CPR Standards and Training for Public Safety Personnel*, effective April 1, 2015. Retrieved from [https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I62F5CF20B55D11E4BD3CC9706BA5168A&originatIonContext=documenttoc&transitionType=Default&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Browse/Home/California/CaliforniaCodeofRegulations?guid=I62F5CF20B55D11E4BD3CC9706BA5168A&originatIonContext=documenttoc&transitionType=Default&contextData=(sc.Default)) on February 22, 2019.
2. Departmental General Order I-2, *Assignment, Servicing, and Repair of Police Vehicles*, revised April 17, 2000
3. Bureau of Field Operations Policy and Procedure Manual, Policy 00-01, *Field Vehicle Inspection*, dated January 14, 2000
4. About Us. The Commission on Peace Officer Standards and Training (POST). Retrieved from <https://post.ca.gov/About-Us> on March 1, 2019.
5. Fire Extinguisher: 101. Care and Maintenance of Your Fire Extinguisher. Retrieved from www.fire-extinguisher101.com/careandmaintenance.html on February, 28, 2019.

Overview

In September 2018, the Office of Inspector General (OIG) undertook the task to inspect the Oakland Police Department's (OPD) Bureau of Field Operations, Bureau of Investigations, and Bureau of Services assigned duty vehicles to ensure that they were properly equipped with fully stocked First Aid kits and fire extinguishers that have been serviced within a year or less. Both are recognized as prominent safety equipment, utilized to safeguard the officers and the public during critical emergency circumstances. There were 286 vehicles inspected, and the inspection indicated that 218 (76%) of them contained First Aid kits that were deemed fully stocked and only 101 (35%) of them contained fire extinguishers that have been serviced within a year or less.

In addition, the inspection produced three other significant findings. First, Departmental General Order I-2 references a Bureau of Field Operations Policy and Procedure regarding field vehicle inspections that is not accessible and therefore cannot be adhered to by the intended audience, district sergeants in the Patrol Division. Second, in practice, the Deficiency Notification Card, used to report missing, damaged, or deficient equipment, is not used by the Fleet Unit personnel. Thirdly, Police Officers are not equipped with tools in their First Aid kits to handle trauma-based injuries during critical emergency circumstances.

Background

The State of California has standards for the training of public safety personnel, including the administering of first aid and cardiopulmonary resuscitation (CPR) and the use of an automated external defibrillator (AED)¹⁰. Further, California Health and Safety Code §1797.183 requires police officers to meet certain standards in first aid proficiency (*including cardiopulmonary resuscitation*). As emergency first responders, police officers may perform CPR and provide basic wound care at the scene of an emergency.

OPD police officers are trained emergency first responders. As such, the OPD has a policy that each police vehicle is to be equipped with tools (a First Aid kit and a fire extinguisher) to assist an officer in administering first aid in critical emergency situations. Its policy, *Departmental General Order I-2, Assignment, Servicing, and Repair of Police Vehicles*, requires [police officers] to conduct an inspection of their vehicles before departing the transportation area.¹¹ In addition to checking the vehicle's safety features (i.e. headlamps, taillights, siren, radio, etc.), an officer, regardless of assignment, is required to ensure that there is a fully supplied First Aid kit (including latex gloves and a CPR mask to protect against blood-borne pathogens) and a fire extinguisher in his/her vehicle.¹² The officer's inspection is documented on a *Field Vehicle Inspection Checklist* (TF-594) form.¹³ If an officer determines that the vehicle has any missing, damaged, or deficient equipment, he/she is required to report the issue to the

¹⁰ California Code of Regulations, Title 22, *Social Security, Division 9. Prehospital Emergency Medical Services*, Chapter 1.5, *First Aid and CPR Standards and Training for Public Safety Personnel*, effective April 1, 2015.

¹¹ The area where police vehicles are checked in and out.

¹² Section II, Subsection E pg. 3

¹³ Section VI, Subsection C, pg. 9. The policy also states, "...route the white copy to the Records Division, the yellow copy to the Personnel and Training Division and retain the pink copy for the inspecting officer's unit's files."

Fleet¹⁴ Unit Officer or designee, who is required to ensure the prompt replacement of the missing, damaged, or deficient equipment. If the Fleet Unit Office is closed, the officer is required to report any problem or deficiency by completing a “Deficiency Notification Card (TF-3114).”¹⁵

Departmental General Order I-2 includes wording that provides a level of assurance that police vehicles are being inspected and equipped with a fully supplied First Aid kit and a fire extinguisher. The policy requires the [Bureau of Field Operations] district Sergeants to inspect the vehicles assigned to the Patrol Division in accordance with the provision of established Bureau of Field Operations Policy and Procedures. In addition, it requires vehicles assigned to the [Bureau of Investigations and the Bureau of Services] to be inspected in accordance with the policies and procedures established by the respective unit commanders. Lastly, it requires commanders of all units to which vehicles are assigned to establish internal procedures to ensure that deficiencies reported during the weekly inspection are corrected.¹⁶

Although OPD policy mandates that police officers carry a fully supplied First Aid kit and a fire extinguisher, the Contributing Auditor wanted to know, “Why do officers have to carry these items? What are they expected to do with them?” Subsequently, she interviewed OPD’s First Aid/CPR/AED Instructor to answer her questions. Following are the questions that were asked and answered:

- Regarding First Aid Kits, the Contributing Auditor asked the Instructor, “Why do police officers carry First Aid kits?” The Instructor replied, “*Because of the victims we encounter, motor vehicle accidents, people falling off skateboards, etc. The items in First Aid kits are used for minor scrapes and cuts and not for major trauma-based injuries.*” The Auditor followed up by asking, “Do all police officers, regardless of rank, have to carry First Aid kits?” The Instructor responded, “*Every vehicle should have a First Aid kit in it.*”
- Regarding fire extinguishers, the Contributing Auditor asked the Instructor, “Why do police officers carry fire extinguishers?” The Instructor replied, “*A post-accident police vehicle may catch on fire, and the officer may catch it in its early stages. An officer may come up on a vehicle accident and put out a fire. Lately, officers may have to put out fires in the homeless encampments.*” The Auditor followed up by asking, “Do all police officers, regardless of rank, have to carry fire extinguishers?” The Instructor answered, “*All operational vehicles should have a fire extinguisher. Even the newer vans, the boats, and the Bearcat [Armored Vehicle] have fire extinguishers.*”

It should be noted that the First Aid/CPR/AED Instructor quoted in this audit teaches a course that meets the State of California requirement of having police officers trained to administer first aid and cardiopulmonary resuscitation (CPR) and to use an automated external defibrillator (AED). Therefore, the focus of his course is not on the supplies in a first aid kit or the servicing of a fire extinguisher. In addition, he possesses a wealth of knowledge on the subject of first aid by having the following qualifications:

¹⁴ Formerly called the “Transportation” Unit.

¹⁵ Section II, Subsections E and F, pgs. 3-4.

¹⁶ Section VII, Subsections A, B, and D, pgs. 8-9

- Is an OPD POST¹⁷-certified instructor;
- Has been teaching the First Aid/CPR/AED course since 2015;
- Is a subject matter expert for the OPD;
- Has taken over 200 additional hours of medical first aid training to stay current in the field;
- Has worked in emergency medical service since 2002;
- Has been a licensed paramedic for 14 years and continues to keep his license current; and
- Has served as a tactical paramedic.

Methodology

To conduct the inspection to ensure vehicles assigned to the Bureau of Field Operations, the Bureau of Investigations, and the Bureau of Services contain fully stocked First Aid kits and fire extinguisher that have been serviced within a year or less, the Lead Auditor sent an email to Command Staff, requesting the following information be sent to OIG for each vehicle assigned to them:

- Vehicle Number
- Dept. Unit or Squad Assigned
- Date of Inspection
- Name of Sergeant Performing Inspection
- Sergeant Serial Number
- Name of person driving vehicle (on date of inspection)
- Officer Serial number
- Fire Extinguisher (Yes or No)
- Date fire extinguisher was last serviced
- First Aid Kit installed (Yes or No)
- Fully Stocked First Aid kit (Yes or No)

The Lead Auditor provided an Excel spreadsheet so the information could be filled in and sent back to OIG in the same format.

A vehicle's First Aid kit was considered fully stocked based on a sergeant's personal assessment of the kit.

A vehicle's fire extinguisher was considered to be serviced within a year or less if the fire extinguisher's maintenance tag was dated November 9, 2017 or later.

Population/Sample

The population consisted of the number of vehicles reported by the Command Staff who responded to the Lead Auditor's email. There was a total of 306 vehicles accounted for in the email responses, and 23 of them were at the Corp Yard and/or unavailable for inspection. The 23 vehicles at the Corp Yard were

¹⁷ The Commission on Peace Officer Standards and Training (POST) was established by the Legislature in 1959 to set minimum selection and training standards for California law enforcement. ([https://post.ca.gov/About -Us](https://post.ca.gov/About-Us)).

eliminated from the population, reducing the number of vehicles in the population inspected for First Aid kits and fire extinguishers to 286.

Findings

Finding #1

Of the 286 vehicles inspected, 218 (76%) of them contained First Aid kits that were deemed fully stocked.

Upon reviewing the responses from the Command Staff regarding First Aid kits, the results were as follows:

First Aid Kits

Reason	Number of Vehicles	Percentage
Deemed to be "Fully Stocked"	218	76%
Deemed to be "Not Fully Stocked"	39	14%
No First Aid Kit in Vehicle	29	10%

Additional Observation(s):

Policy does not define a "Fully Supplied" First Aid kit.

Departmental General Order I-2 requires police officers to conduct an inspection to ensure each vehicle, regardless of assignment, maintains a fully supplied First Aid kit (including latex gloves and a CPR mask to protect against blood-borne pathogens). However, the policy does not define "fully supplied," therefore, when conducting this inspection, sergeants had to rely upon their own assessments of First Aid kits when deeming it fully stocked, or not fully stocked. Not defining "fully supplied" in policy inhibits a police officer's ability to know whether his/her vehicle's First Aid kit has the minimum amount of supplies needed to handle minor scrapes and cuts, if necessary, prior to leaving the transportation area.

In search of what is considered a "fully supplied or fully stocked" First Aid kit, the Contributing Auditor interviewed OPD's Fleet Coordinator and First Aid/CPR/AED Instructor. The Contributing Auditor asked the Fleet Coordinator, "Do you know what is considered a "fully stocked or fully supplied" First Aid kit?" She replied, "No, but I can get a list of what is in the kit." The Contributing Auditor did not request that the Fleet Coordinator get the list. Subsequently, the Contributing Auditor met with one of OPD's First Aid/CPR Instructors and asked him, "What items have to be in the First Aid kit for it to be deemed "fully supplied?" He responded, "In general, 'fully stocked' should be a minimum amount of supplies to have on hand. However, OPD has not established and does not teach a definition of 'fully stocked.' In addition, there is no list of the supplies that should be in a First Aid kit."

The Fleet Unit Coordinator can only replenish Band-Aids, tape, and gauze in First Aid kits, but not a complete First Aid kit.

Departmental General Order I-2 states that missing, damaged, or deficient equipment shall be reported to the Fleet Unit Officer or designee, and he/she shall ensure its prompt replacement. The inspection determined that there were 29 vehicles that did not contain First Aid kits. However, the Fleet Coordinator advised the Lead Auditor that she does not order First Aid kits. The Contributing Auditor followed-up by asking the Fleet Coordinator, "If not the Fleet Unit personnel, who is responsible for ordering First Aid kits?" She stated, *"[It is] unknown who orders First Aid kits, as they are only supplied by the Corp Yard for brand new cars. I have some supplies here to replenish Band-Aids, tape, and gauze."* The Contributing Auditor followed-up by asking the Fleet Coordinator, "Are you only responsible for restocking gauze, Band-Aids, and tape?" The Fleet Coordinator stated, *"That is all that is back here."* The Fleet Coordinator operates out of the Transportation office located at the main Police Administration Building.

The Contributing Auditor informed the First Aid/CPR/AED Instructor that, during the inspection, it was determined that the Fleet Unit's Coordinator can only replenish Band-Aids, tape, and gauze in First Aid kits. In addition, she does not order First Aid kits, and there were 29 vehicles that did not have First Aid kits. The Auditor asked the Instructor, "Do you teach officers where to get First Aid kits if needed?" The Instructor replied, *"We have no supply of First Aid kits, and, [to my knowledge], never ordered a supply."* Not having First Aid kits on hand to give to an officer whose vehicle does not contain a First Aid kit inhibits his/her ability to handle minor scrapes and cuts, if necessary.

Policy does not mention the checking of expiration dates on sterile supplies in First Aid kits.

While interviewing the First Aid/CPR/AED Instructor, the Contributing Auditor asked, "Do First Aid kits have an expiration date?" The Instructor stated, *"Some sterile products (i.e., an elastic bandage, antiseptic cream, burn gel, etc.) in a First Aid kit have expiration dates. In addition, some manufacturers consider the entire First Aid kit expired based on the date of the product that expires first in the kit."* The Auditor asked the Instructor, "Are police officers taught how to ensure the First Aid kit and/or its contents are not expired?" The Instructor replied, *"No."*

Although Departmental General Order I-2 requires police officers to conduct an inspection to ensure each vehicle, regardless of assignment, maintains a fully supplied First Aid kit, it does not require officers to check the expiration dates on sterile supplies in First Aid kits. Therefore, it is unknown whether the 218 First Aid kits deemed to be fully stocked and the 39 First Aid kits deemed not to be fully stocked have expired sterile supplies in them. The OIG decided not to include the expiration dates on sterile supplies in this inspection since it is not transparent what OPD deems a "fully supplied" First Aid kit.

OPD no longer provides CPR masks but instead trains its officers to perform CPR by doing chest compressions.

Departmental General Order I-2 states, "...an officer...is required to ensure that there is a fully supplied First Aid kit including...a CPR mask to protect against blood-borne pathogens. The Contributing Auditor asked the First Aid/CPR/AED Instructor, "Do police officers still use CPR masks?" The Instructor stated, *"Yes and no. Some officers continue to carry masks that were distributed to them prior to my Academy in 2014. I saw an officer with a mask attached to his key chain and asked to see it. It was a sheet of*

plastic and has a valve; however, it [is the type of mask that] does not prevent against communicable diseases. I teach the standards of acceptable masks, and, and at this time, the OPD does not provide them. [Instead] officers are trained to perform CPR by using chest compressions, which is the preferred method of the American Heart Association.” A police officer who has a CPR mask that does not prevent communicable diseases and uses said mask to conduct CPR on a person places him/herself at risk to contract a disease. The Contributing Auditor did ask the Instructor if the OPD issued a recall of the masks that do not prevent against communicable diseases and he stated, “No.”

Finding #2

Only 101 (35%) of the 286 vehicles inspected contained fire extinguishers that had been serviced within a year or less.

Upon reviewing the responses from the Command Staff regarding fire extinguishers, the results were as follows:

Fire Extinguishers

Service Date	Number of Vehicles	Percentage
Fire extinguisher’s maintenance tag was dated November 9, 2017 or later	101	35%
Fire extinguisher’s maintenance tag was dated November 8, 2017 or earlier	156	55%
Unable to determine the date on the fire extinguisher’s maintenance tag or there was no service date on the maintenance tag	23	8%
No Fire Extinguisher in Vehicle	6	2%

Additional Observation(s)

Fire Extinguishers serviced more than a year ago are being replaced as a result of this inspection.

During the inspection, the Lead Auditor requested Command Staff to ensure any fire extinguisher serviced more than a year ago was exchanged for a new one, and if they are unable to exchange it to notify her of the reason. Subsequently, the Lead Auditor was advised that the Fleet Coordinator ran out of fire extinguishers to exchange. The Contributing Auditor followed up with the Fleet Coordinator by asking, “Has the Fleet Unit restocked fire extinguishers? The Fleet Unit Coordinator stated, “*We have fire extinguishers. They are in Transportation. It is one for one. An officer brings in his/her [fire extinguisher needing service] or used one and picks up a new one. In the Fleet Unit Office, I keep crates with fire extinguishers in them, so, if I am not here, officers can help themselves.”* The Contributing Auditor then asked the Coordinator, “How quickly are you able to restock when fire extinguishers are out of stock?” The Coordinator replied, “*I get fire extinguishers from the Corp Yard.¹⁸ I can get them the same day if the Corp Yard has them on hand. If I take five empties or damaged fire extinguishers, the*

¹⁸ The place where all City of Oakland vehicles are serviced.

Corp Yard will give me five good ones. I have to give them an empty or damaged extinguisher to get a good one. Since the audit (sic), officers have been coming to me to replace their expired fire extinguishers.”

Policy does not inform a police officer of the value of the maintenance tag on a fire extinguisher.

Fire extinguishers should be maintained at regular intervals (at least once a year), or when specifically indicated by an inspection. Maintenance is a “thorough check” of the extinguisher. It is intended to give maximum assurance that an extinguisher will operate effectively and safely. It includes a thorough examination and any necessary repair, recharging or replacement.¹⁹

Departmental General Order I-2 requires police officers to conduct an inspection to ensure each vehicle, regardless of assignment, maintains a fire extinguisher. However, it does not inform officers that the maintenance tag on the fire extinguisher shows the date the extinguisher was last serviced. In addition, it does not state that to have maximum assurance that a fire extinguisher will operate effectively and safely, an officer shall ensure his/her vehicle’s fire extinguisher has been serviced within a year or less. Not advising an officer of the value of the maintenance tag on the fire extinguisher cause him/her to leave the transportation area with a faulty extinguisher.

The Contributing Auditor interviewed the First Aid/CPR/AED Instructor and asked him, “Are police officers taught how to determine whether a fire extinguisher has been serviced within a year or less?” The Instructor responded, “No. However, during the hazmat (hazardous materials) block of the Academy training, officers are taught how to use a fire extinguisher.” Hence, the Auditor reasoned that the lack of knowledge about the maintenance tag in policy may account for only 101 (35%) of the inspected vehicles containing fire extinguishers that have been serviced within a year or less.

Finding #3

Departmental General Order I-2 references a Bureau of Field Operations Policy and Procedure regarding field vehicle inspections that is not accessible and therefore cannot be adhered to by the intended audience, district sergeants in the Patrol Division.

Departmental General Order I-2 states that vehicles assigned to the Patrol Division shall be inspected by district sergeants in accordance with the provisions of established Bureau of Field Operations Policy and Procedure. The Bureau of Field Operations Policy and Procedure Manual, Policy 00-01, *Field Vehicle Inspection*, reads, in part:

“Sergeants Responsibility...

Mechanical Condition: Mechanical defects and/or missing equipment shall be reported as soon as possible to the Transportation Unit officer or designee or complete a Repair/Discrepancy Notification Card (TF-3114) if no one is present in accordance with Department General Order I-2.

¹⁹ www.fire-extinguisher101.com/careandmaintenance.html

The assigned First and Second Watch sergeant(s) shall complete a Field Vehicle Inspection Checklist (TF-594) on a weekly basis. Discrepancies shall be noted in the appropriate spaces. The completed Field Vehicle Inspection Checklist shall be distributed in accordance with the provisions of Departmental General Order I-2, *Assignment, Servicing, and Repair of Police Vehicles.*"

However, the policy, Departmental General Order I-2, as an internal control is deficient because the intended audience, district sergeants, do not have access to the Bureau of Field Operations Policy and Procedure Manual, Policy 00-01, and therefore cannot adhere to its requirements. The Contributing Auditor searched OPD's Power DMS²⁰ system for a copy of the BFO Policy and Procedure, and she was unable to locate it. Subsequently, via email, she contacted the Manager of the OPD's Policy and Publication Unit, seeking a copy of the BFO Policy and Procedure. The Manager located the BFO Policy and Procedure in the OPD's archives and sent her a copy. It is unknown why an active²¹ BFO policy is not in Power DMS.

Additional Observation(s)

OPD's policies related to vehicle inspections and first aid (Departmental General Order I-2, Bureau of Field Operations Policy and Procedure Manual, Policy 00-01, and Training Bulletin III-K) are outdated.

Upon review of both policies, the Contributing Auditor noted that Departmental General Order I-2, *Assignment, Servicing, and Repair of Police Vehicles*, was last revised April 17, 2000, almost 19 years ago. In addition, she noted that the Bureau of Field Operations Policy and Procedure Manual, Policy 00-01, *Field Vehicle Inspection*, is dated January 14, 2000, more than 19 years ago. Lastly, Training Bulletin III-K, *First Aid*, was published August 25, 1975, more than 43 years ago.

Finding #4

In practice, the Deficiency Notification Card, used to report missing, damaged, or deficient equipment, is not used by the Fleet Unit personnel.

Departmental General Order I-2 states that if the Fleet Unit Office is closed, the officer is required to report any problem or deficiency by completing a "Deficiency Notification Card (TF-3114). The Fleet Coordinator was asked by the Contributing Auditor, "Who gets the Deficiency Notification Card?" She responded, "I do not know what a Deficiency Notice is, and it is not dropped here at Transportation." In addition, using the OPD's Power DMS system, the Contributing Auditor searched for a copy of the Deficiency Notification Card but was unable to locate it. If the OPD's goal is to maintain a record of its vehicles' missing, damaged, or deficient equipment and to ensure the issues are handled in a timely manner, referencing a card in policy that is no longer used prohibits the OPD from attaining its goal.

²⁰ A law enforcement policy and training management system used by OPD.

²¹ According to Departmental General Order A-1, Section I, Subsection E, unit policies and procedures remain in effect until revised, superseded, or canceled.

Finding #5

Police Officers are not equipped with tools in their First Aid kits to handle trauma-based injuries.

During this audit, the Contributing Auditor was informed by the First Aid/CPR/AED Instructor that the items in First Aid kits are used for minor scrapes and cuts and not for major trauma-based injuries. The Auditor asked the Instructor, “Do police officers carry personal trauma kits?” The Instructor replied, “No. I am [concerned] that we do not. There should be two types of First Aid kits. There should be First Aid kits [with] supplies to handle minor injuries up to major bleeding. The benefit of this type of kit is being able to handle multiple kinds of injuries such as burns, lacerations, gunshot wounds, etc. Officers should have what is called an Individual First Aid Kit (IFAK). It is a kit that does not treat much, only a major injury. An officer would carry an IFAK on his/her person in case of a major officer injury. Both types of First Aid kits should include a tourniquet, chest seal, and wound packing.

[In addition], none of the training equipment used in the First Aid/CPR training gives us trainers the ability to train people at a higher level [of care]. Currently we have five adult dummies in various states of disrepair, four child dummies and two infant dummies. If we had a bleeding station, we could teach officers how to treat injuries such as a hemorrhaging leg and a gunshot wound. Also, a moulage training kit, which is used to replicate real-life trauma on body parts, would assist us trainers in providing reality-based training at a higher level to officers by allowing them to practice bandaging and splinting techniques on arms, legs, head, etc.” The Auditor noted that not having the tools for trauma-based injuries limits an officer’s ability to administer first aid during these types of incidents.

Department Response

According to the Training Division Commander, the Department has secured grant funding to resupply officers with trauma kits.

Findings and Recommendations

<p><u>Finding #1</u> Of the 286 vehicles inspected, 218 (76%) of them contained First Aid kits that were deemed fully stocked.</p> <p><u>Additional Observations</u> Policy (Departmental General Order I-2) does not define a “fully supplied” First Aid kit.</p> <p>The Fleet Unit Coordinator can only replenish Band-Aids, tape, and gauze in First Aid kits, but not a complete First Aid kit.</p>	<p>The Department should revisit its policy, Departmental General Order I-2, to incorporate best practices and include the following:</p> <ul style="list-style-type: none">• Ensure it is clear what a “fully supplied” First Aid kit is by providing a list of supplies that should be present. As OPD’s First Aid/CPR/AED Instructor stated, “In general, ‘fully stocked’ should be a minimum amount of supplies to have on hand.”• Ensure the policy informs police officers of expiration dates of sterile supplies in their
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<p>Policy does not mention the checking of expiration dates on sterile supplies in First Aid kits.</p> <p>OPD no longer provides CPR masks but instead trains its officers to perform CPR by doing chest compressions. The First Aid/CPR/AED Instructor stated that the CPR mask that the OPD provided <i>[is the type of mask that] “does not prevent against communicable diseases.”</i></p>	<p>First Aid kits and the need to replace them if expired.</p> <ul style="list-style-type: none"> • Ensure all references to CPR masks are deleted. The Department should also recall all CPR masks to preclude officers from using a mask that does not prevent against communicable diseases. <p>The Department should ensure that once it defines “fully supplied,” the Fleet Unit Coordinator can replenish all supplies in the First Aid kit. In addition, the Department should order extra First Aid kits to have on hand in the Fleet Unit.</p>
<p><u>Finding #2</u> Only 101 (35%) of the 286 vehicles inspected contained fire extinguishers that had been serviced within a year or less.</p> <p><u>Additional Observations</u> Departmental General Order I-2 does not inform police officers of the value of the maintenance tag on a fire extinguisher. Specifically, it does not inform officers that the maintenance tag shows the date the extinguisher was last serviced. In addition, the policy does not state that to have maximum assurance that a fire extinguisher will operate effectively and safely, an officer shall ensure his/her vehicle’s fire extinguisher has been serviced within a year or less.</p>	<p>The Department should revise its policy to ensure its police officers are informed that the maintenance tag shows the date the extinguisher was last serviced. In addition, the policy should inform officers that to have maximum assurance that a fire extinguisher will operate effectively and safely, an officer shall ensure his/her vehicle’s fire extinguisher has been serviced within a year or less.</p> <p>In addition, the Vehicle Inspection form (TF-594 Mar 2018)) should be updated to include a column for the fire extinguisher’s service date shown on the maintenance tag. The reason for this recommendation is as follows:</p> <ul style="list-style-type: none"> • It will ensure that the extinguisher is being physically inspected and not just be checked off as simply being in the vehicle; • It will provide tracking information to the Fleet Coordinator in regards to the status of the extinguishers; • It will allow the Fleet Unit Coordinator to plan in regards to how many extinguishers will be needed and stock them accordingly; and • It will allow the Fleet Coordinator to communicate with the Corp Yard Supervisor in advance if there is going to be a shortage of Fire Extinguishers due to upcoming expiration dates.

<p>Finding #3 Departmental General Order I-2 references a Bureau of Field Operations Policy and Procedure regarding field vehicle inspections that is not accessible and therefore cannot be adhered to by the intended audience, district sergeants in the Patrol Division.</p> <p>Additional Observation OPD’s policies related to vehicle inspections and first aid (DGO I-2, BFO Policy and Procedure Manual, Policy 00-01, and Training Bulletin III-K) are outdated.</p>	<p>The Department should update DGO I-2 and determine if BFO Policy and Procedures Manual, Policy 00-01 is still relevant. If so, BFO Policy 00-01 needs to be revised and incorporated in Power DMS.</p> <p>The Department should also update Training Bulletin III-K, <i>First Aid</i>, to ensure it incorporates best practices, since it was published more than 43 years ago.</p>
<p>Finding #4 In practice, the Deficiency Notification Card, used to report missing, damage, or deficient equipment, is not used by the Fleet Unit personnel.</p>	<p>The Department should ensure its practice coincides with its policy. Either use the Deficiency Notification Card or revise the policy by deleting all references to the card.</p>
<p>Finding #5 Police Officers are not equipped with tools in their First Aid kits to handle trauma-based injuries.</p>	<p>The Department should invest in and equip its officers with tools to handle trauma-based injuries. As the First Aid/CPR/AED Instructor stated, <i>“There should be two types of First Aid kits. There should be First Aid kits [with] supplies to handle minor injuries up to major bleeding... Officers should have what is called an Individual First Aid Kit (IFAK)...in case of a major officer injury. Both types of First Aid kits should include a tourniquet, chest seal, and wound packing.”</i></p> <p>In addition, the OPD should enhance its training program by teaching its officers to assist with trauma-based injuries and by investing in a bleeding station and a moulage kit. As the First Aid/CPR/AED Instructor stated, <i>“If we had a bleeding station, we could teach officers how to treat injuries such as a hemorrhaging leg and a gunshot wound. Also, a moulage training kit, which is used to replicate real-life trauma on body parts, would assist us trainers in providing reality-based training at a higher level to officers by allowing them to practice bandaging and splinting techniques on arms, legs, head, etc.”</i></p>