



Date: August 15, 2024

To: Sheryl M.M. Long, City Manager

From: Lauren Sundararajan, CFE, Internal Audit Manager *LS*

Copies to: Internal Audit Committee
William Weber, Assistant City Manager
Teresa A. Theetge, Chief of Police

Subject: **Cincinnati Police Department - Youth Services Unit Audit**

Attached is the Cincinnati Police Department (CPD) - Youth Services Unit audit report. The primary objective of this performance audit was to assess the efficiency and effectiveness of the internal controls and practices applicable to the CPD - Youth Services Unit.

We would like to thank the management and staff of the CPD for their assistance and cooperation during this audit.

If you need any further information, please contact me.

Attachment

Cincinnati Police Department - Youth Services Unit Audit

August 2024



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Internal Audit Manager

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Internal Auditor

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Executive Summary

Internal Audit (IA) conducted a performance audit of the Cincinnati Police Department's (CPD) Youth Services Unit (YSU). The primary objective of this audit was to assess the efficiency and effectiveness of the internal controls and practices applicable to the unit.

The YSU is responsible for collaborating with other government, community, and youth services agencies to develop, implement, or supplement resources, programming, training, and other educational and support services for youth. The audit revealed several opportunities for strengthening the internal controls over the YSU process. For instance, IA determined that YSU should update and expand program policies and procedures to include a youth safety plan for all programs under the YSU umbrella. To maximize program efficiency and youth safety, this document should be created and frequently updated to reflect current operations.

IA found that there is no contract between the City of Cincinnati (City) and the Cincinnati Police Athletic League (CPAL), a nonprofit organization that manages donations to Children in Trauma Intervention (C.I.T.I.) Camp. While an ordinance was passed allowing YSU to accept an in-kind donation of goods and services from CPAL, no legally binding contract exists to delineate safety protocols, confidentiality, paid presenter/volunteer roles and responsibility, or scope of services. To maximize safety and confidentiality, and minimize misunderstandings, YSU should work with the Law Department to develop a contract between the City and CPAL.

IA also could not determine whether program volunteers associated with C.I.T.I. Camp have been properly vetted or trained. This may expose the City to legal and financial liability should a harmful individual come into contact with program youth. To maximize safety and success of the program, YSU should ensure that these individuals have undergone a vetting process and received appropriate training.

IA was unable to determine whether presenters, who were also City employees at the time they provided services to C.I.T.I. Camp, received dual compensation. Per City policy, City employees cannot receive compensation for an outside position on City time. To prevent conflicts of interest and legal ramifications, YSU should work with the CPD Fiscal Section to confirm that these individuals did not receive dual compensation.

Furthermore, IA determined that YSU is not included in CPD's records retention schedule. The proper storage and disposal of public records is legally required by State law, and without clear guidelines for retaining documents, YSU cannot confirm that all non-exempted records are available for inspection. As such, including YSU records in CPD's records retention schedule is essential.

Overall, IA found that to strengthen internal controls over YSU, the following recommendations should be incorporated: update and expand program policies to include a youth safety plan; work with the Law Department to develop a contract between the City and CPAL; ensure that program volunteers undergo a vetting process and receive appropriate training; work with the CPD Fiscal Section to confirm that presenters did not receive dual compensation; and include YSU records in CPD's records retention schedule.

I. Introduction

Background

The Youth Services Unit is led by a captain, three supervisors, twelve School Resource Officers (SRO), and a youth program coordinator who serves as a backup SRO. The YSU is responsible for conducting both school year and summer programs. During the school year, YSU provides SRO services to over 140 Cincinnati Public Schools (CPS). These SROs ensure the safety of students and teachers by enforcing laws on school grounds¹. They begin their days by patrolling their primary school, then checking to see whether they are needed at their secondary and tertiary schools. These SROs play a critical role in safeguarding learning environments and improving youth attitude toward police officers.

YSU runs the Cincinnati Police Summer Cadet Program (Cadet Program), which gives students ages 16 to 18 the opportunity to work part-time for CPD. The Cadet Program provides support and education to students who are interested in police careers while encouraging them to take the Police Recruit examination and work for CPD in the future. Summer cadets may also participate in YSU's Public Safety Cadet program, a comparable program which runs year-round.

YSU is also responsible for running the Captain Kimberly Williams Children in Trauma Intervention Camp (C.I.T.I. Camp), named after a beloved former CPD captain who passed away in 2018. C.I.T.I. Camp, a 7-week program for students ages 10-12, teaches coping and conflict resolution skills to children who have experienced severe trauma.² Programming for C.I.T.I. Camp may include career exploration, exercise classes, and drug awareness discussions; older students can also take part in Beyond C.I.T.I. Camp, a comparable program that runs later in the summer. Ensuring that these students have the resources to express their emotions in a healthy way is critical to improving youth outcomes and safety Citywide.

The City is responsible for funding YSU's SRO salaries and day-to-day administrative operations. Additionally, the Cincinnati Recreation Commission (CRC) is responsible for approving the YSU budget and receiving invoices for all purchases related to the Cadet Program. In comparison, C.I.T.I. Camp is funded through donations: the Hatton Foundation, a philanthropic nonprofit organization, has provided funding to C.I.T.I. Camp in recent years. On June 5, 2024, Emergency Ordinance No. 190-2024 was passed, authorizing the City Manager to accept an in-kind donation of goods and professional services from CPAL, another non-profit organization, which receives a grant from the Hatton Foundation to subsidize the cost of operating C.I.T.I. Camp. YSU submits invoices to CPAL for expenses such as program supplies and salaries for C.I.T.I. Camp's paid presenters, and CPAL provides the funds from the Hatton Foundation's yearly donation.

¹ <https://www.cincinnati-oh.gov/police/youth-services/>

² <https://www.wlwt.com/article/students-celebrate-program-leadership-citi-camp-graduation/44677540>

Audit Selection

IA conducted this audit at the request of the City Manager.

Audit Objective

The primary objective of this performance audit was to assess the efficiency and effectiveness of the internal controls and practices applicable to the CPD - Youth Services Unit.

Audit Scope and Methodology

To accomplish the audit objective, Internal Audit reviewed pertinent policies and procedures, sought verification of procedures through documented reports, interviewed appropriate staff, and analyzed relevant data. Records reviewed included data generated between fiscal years (FY) 2022-2024.

Statement of Auditing Standards

As required by the Cincinnati Administrative Code Article II §15, this audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), except for standard 5.60 pertaining to external peer review requirements. This exception did not have a material effect on the audit.

IA continues to conduct internal quality reviews to assure conformance with applicable GAGAS. IA performed the fieldwork between May and July of 2024.

Commendations

IA commends the staff of the Cincinnati Police Department for their cooperation throughout the audit.

II. Audit Findings and Recommendations

Policies and procedures should be updated and expanded to include a youth safety plan for C.I.T.I. Camp and the Cadet Program.

Policies and procedures are an important management tool and must be current and complete to be effective. Developing clear guidelines for staff to follow when interacting with youth is crucial, as any misconduct or negative interactions that may occur can undermine trust between law enforcement officers and the young people they serve. Additionally, any injury or other harm to youth in these programs may lead to legal liabilities and undermine the credibility of both YSU and CPD.

IA was informed that department policies and procedures are only updated when command changes; YSU's procedures were recently updated on May 14, 2024. However, these documents only include policies and procedures for SROs in the school environment, and do not outline policies for other programs in which they work, such as C.I.T.I. Camp or the Cadet Program. Additionally, these policies and procedures lack child and youth safety guidelines for procedures for staff interaction with youth; rather, officers follow general procedures outlined by CPD that do not focus on protocol for working with severely traumatized juveniles. As such, developing a code of conduct and youth safety plan tailored specifically to YSU helps to protect the youth, CPD officers, and the City as a whole, and this document should be frequently updated to reflect current operations.

Recommendation 1: Update and expand policies and procedures to reflect current operations and include all programs under the YSU umbrella. Additionally, develop a formalized code of conduct and youth safety plan specific to YSU.

Department Response: Agree. YSS will create evidence-based camp specific standard operating procedures that specifically address youth camp operations. This will include a safety guidelines and an age-appropriate code of conduct tailored to the officers and participants.

There is no contract between the City and the Cincinnati Police Athletic League (CPAL).

On June 5, 2024, Emergency Ordinance No.190-2024 was passed, allowing YSU to accept an in-kind donation of goods and professional services from CPAL, a non-profit organization that manages donations from the Hatton Foundation, YSU's primary donor for C.I.T.I. Camp. However, no legally binding contract exists to delineate safety protocols, confidentiality, paid presenter/volunteer roles and responsibility, or scope of services. Having a legally binding contract in place can prevent disputes over roles and responsibilities, ensure clarity around safety practices and confidentiality, and minimize misunderstandings between the City and CPAL.

Recommendation 2: Work with the Law Department to develop a contract between the City and CPAL.

Department Response: Agree. While future YSS partnerships with CPAL are not anticipated, in all future camps YSS will defer to the Law Department's recommendations on situation specific needs for memoranda of agreement or other binding directives.

Volunteers have not signed the C.I.T.I. Camp Program Volunteer "General Release of All Claims" Waiver Forms.

A C.I.T.I. Camp Program Volunteer General Release of All Claims Form was created for volunteers of the camp by the Law Department. A release from liability waiver adds an extra layer of protection for a municipality against lawsuits by planning for and addressing potential disputes. This document is a written statement in which the volunteer agrees to assume the risk of injury inherent in the volunteer activity and releases the organization from liability for any injuries that they might sustain while working as a volunteer. IA determined that as of June 24, 2024, current program volunteers have not signed the release from liability waiver.

Recommendation 3: Require that program volunteers, especially those working with children, be compelled to sign a general release of all claims form.

Department Response: Agree. Non-City employees will be required to sign a release of claims prior to involvement in programming or contact with camp participants.

IA has no evidence that the volunteers associated with the C.I.T.I. Camp Program have been properly vetted or trained.

Evidence of training and vetting helps safeguard the well-being of young participants, as well as assuring a municipality of the quality of volunteers affiliated with their City-sponsored program. It also ensures that volunteers understand responsibilities, boundaries, and appropriate behavior when interacting with youth.

IA was informed that all the volunteers for the C.I.T.I. Camp program have been vetted and background checked by virtue of the agency they are affiliated with, are either retired City employees, or are subject matter experts. However, evidence of this training and vetting was not provided to IA upon request, and CPD does not keep personnel files on these individuals, including any prior youth training that they may have received.

Recommendation 4: Ensure that there is a record of all YSU volunteers' status and ensure that they have received appropriate training and background checks before working with program youth.

Department Response: Agree. All non-City employees will be subject to a criminal records background check prior to contact with youth.

IA was unable to determine whether City employees who were listed as presenters for C.I.T.I. Camp received dual compensation.

As part of C.I.T.I. Camp's programming, YSU brings in paid presenters who are subject matter experts such as martial arts instructors, arts and crafts instructors, and step instructors. These presenters are paid from the C.I.T.I. Camp budget for their services. IA confirmed that two of these paid presenters were also City employees at the time they provided services to C.I.T.I. Camp in the years during the audit's scope (2022-2023).

Per Administrative Regulation No. 68, City employees cannot receive compensation for an

outside position on City time.³ Thus, IA sought to determine whether these particular presenters were paid from both the C.I.T.I. Camp budget and the City. However, IA could not confirm that these presenters were not paid twice. This presents potential conflicts of interests, as well as legal ramifications; thus, it is critical to determine whether these presenters were engaged in outside employment during their City work hours that may have affected their abilities to carry out their duties as City employees, in possible violation of Administrative Regulation No. 68.

Recommendation 5: Work with the CPD Fiscal Section to ensure that any City employees providing services to C.I.T.I. Camp did not receive dual compensation.

Department Response: Agree. No City employees received dual compensation during the 2024 CITI Camp. However, all City employees in future camps will be requested to be assigned to camp activities as their primary duty and compensated according to existing labor agreements and City policies.

Intradepartmental communication between YSU and the CPD Fiscal Section should be strengthened.

Intradepartmental communication is essential for ensuring the smooth operation, safety, quality, and continuous improvement of a summer program. IA was informed that, in the past, the unit's management frequently misunderstood and misinterpreted the City's procurement rules and regulations for funding and did not communicate major budget decisions to the CPD Fiscal Section. As such, the CPD Fiscal Section was unaware of how YSU was managing the program budget. For example, IA was informed that YSU took summer cadets on a trip to Coney Island, and the CPD Fiscal Section was unaware of this until YSU sent the bill. It is essential that the CPD Fiscal Section is made aware of YSU's budgetary decisions to ensure efficient and effective intradepartmental communication, as any miscommunications can lead to violation of the City's financial policies.

Recommendation 6: Improve communication between YSU and the CPD Fiscal Section to ensure effective internal collaboration and that the City's financial policies are adhered to.

Department Response: Agree. Future camps will be planned in full partnership with CPD Fiscal Section as well as the Personnel Unit and will adhere to City contract and purchasing guidelines.

There is no memorandum of understanding (MOU) between YSU and the Cincinnati Recreation Commission (CRC).

Developing a MOU is critical to ensuring interdepartmental collaboration by clarifying department roles and responsibilities and fostering positive relationships. Since 2018, CRC has handled all youth-to-work program budgets, including the Cadet Program's. IA was informed that there is no schedule for YSU to provide CRC with program invoices, and as such, YSU provides all invoices once per year. However, CRC would prefer to receive a monthly invoice, as

³ "During working hours, employees are expected to devote their full time and attention to the business affairs of the City. City employees shall not engage in any outside employment... that influences or affects the carrying out of his or her duties as a City employee... A City employee must get outside employment approved, and the City may prohibit an employee's outside employment that creates a conflict of interest." Administrative Regulation 68

receiving invoices so infrequently can hinder processes on CRC's end.

Recommendation 7: Create and implement a MOU that clarifies the roles and responsibilities between CRC and YSU.

Department Response: Agree. The City Law department, in consultation with CPD's legal advisors, will be asked to author necessary MOUs for future CITI Camp activities. CPD has already begun to explore an expanded partnership with CRC for future camps.

There is no formal succession planning for YSU.

Succession planning is important for several reasons, such as continuity of operations, retention of institutional knowledge, mitigation of risk, and leadership development. IA determined that while YSU employees who were leaving the program spent time reviewing the responsibilities of their roles with their successors, it was difficult for them to schedule these meetings due to their schedules as SROs. For example, before the former program coordinator left, two SROs attempted to shadow him; however, it was impossible to do so, as the SROs were at their respective schools during the daytime.

A lack of succession planning can manifest as a disruption in workflow, which may hinder the program in operating efficiently and affect overall morale. As such, instituting a training plan for YSU leadership positions may prevent disruptions in YSU operations and eliminate autocracy.

Recommendation 8: Establish a succession or cross-training plan to ensure smooth transitions of leadership within YSU.

Department Response: Agree. YSS leadership will develop a succession training plan for the program coordinator position. YSS has already announced that more SROs will be expected to participate in program coordinator duties to better distribute responsibilities and skills in camp planning tasks.

Oversight of YSU data should be strengthened.

Proper management oversight is necessary to ensure that program processes are functioning as intended, errors are detected, and department objectives are being met. When YSU was asked to provide a list of C.I.T.I. Camp program participants, IA found that this information is maintained by a third-party organization. When a third-party organization, whose processes may not align with the City's procedures, is allowed to control data, program operations may be disrupted, and integrating the third party's systems with the City's can be challenging. As such, it is essential that YSU management conducts review and oversight of all program documents, especially youth data, to ensure effective operations and program accountability.

Recommendation 9: Create and maintain an internal database that tracks all YSU program participant information. Additionally, conduct review and oversight of all program documents.

Department Response: Agree. YSS has already begun digitizing CITI camp data. Under the guidance of Dr. Miranda Celeste, college interns and an Understudy have been entering current and historical data on campers which is enabling analysis of camp activities which has never been done before. Future data will be digitized as much as possible.

Previous camp applications were handled by an outside party which resulted in data not being under YSS control. YSS now has a general email address (CPDYouthServices@cincinnati-oh.gov) which will be used for all future camp registrations bringing all data under only CPD control and management.

YSU is not included in CPD's records retention schedule.

The City adheres to the State's Public Records Act, which requires a records retention schedule to ensure that a department has an overview of what records it has stored and how long it has kept them. It also helps to identify whether old files should be archived or disposed of, ensure records are not misplaced, and safeguard sensitive data. Without guidelines on how to retain these documents, YSU cannot confirm that all non-exempted records are available for inspection by the public.

Recommendation 10: Include YSU records in CPD's records retention schedule.

Department Response: Agree. YSS will comply with all records retention guidelines and update it to include any records inadvertently omitted. YSS is transitioning to maximizing the use of as many electronic records as possible so will also update the medium listed on the retention schedule.

CITI Camp sign-in sheet records are incomplete.

Ensuring that every participant in a youth program signs in and out on a daily sign-in sheet is important for safety and accountability, attendance tracking, and program evaluation. When a sign-in/out sheet is incomplete, YSU cannot determine which participants were in attendance upon review; additionally, safety and security of program youth can become compromised if participants are not accounted for at the beginning and end of the day.

YSU provided IA with file folders containing all daily sign-in sheets from 2022, 2023, and 2024. IA then reviewed 29 randomly selected sheets; it was determined that all randomly selected daily sign-in-sheets were available for 2022, only two total daily sign-in sheets were available for 2023, and all but two total sign-in sheets were available from the 2024 folder. IA was unable to locate any of the missing sheets. Additionally, IA determined that 100% of the 29 reviewed sign-in sheets were missing parent signatures at sign-in and/or sign-out. Ensuring that these records are complete is essential to maintaining youth safety, parental assurance, and resource management.

Recommendation 11: Ensure that all sign-in sheet records are maintained and that participants are signed in and out on each daily sign-in sheet.

Department Response: Agree. Part of the increased CITI Camp standard operating procedures will require closer supervision and daily auditing of attendance records. Newly adopted analysis has already started cross-referencing attendance records with student pre and post tests for verification of attendance.

Cadet file folders did not contain all the necessary information on the file checklist developed by YSU.

Maintaining accurate and complete documentation of youth information is critical to ensuring that all necessary information is available not only to YSU personnel, but also to a third-party reviewer. Having and adhering to a checklist for the contents of a folder is important for organization, efficiency, preparedness, data loss prevention, and ensuring that important documents are always at hand when needed.

To aid with IA's file review of the Cadet Program, YSU provided IA with an aggregate list of cadets from 2022, 2023, and 2024. IA then selected 20% of cadet files from each year, and evaluated each file by determining whether all necessary information from the YSU cadet checklist was enclosed. IA found that out of 25 reviewed files, 17 (68%) did not contain all components listed on the checklist, such as work permit paperwork, Hamilton County Juvenile Court records requests, and participant photos.

Recommendation 12: Ensure that each participant file folder is accurate, complete, and in compliance with the YSU-developed checklist. Additionally, consider implementing an electronic content management system for more effective and efficient operations.

Department Response: Agree. The Youth Services Section's goal is to use as many electronic records as possible thus minimizing the need for paper records. Of those paper records that must be kept in accordance with records retention, a supervisory audit will be conducted each year at the beginning of the cadet program

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

III. Conclusion

YSU is responsible for a variety of programs to ensure the continued safety and development of Cincinnati's youth. The audit revealed several opportunities for improvement of YSU processes.

To strengthen the internal controls over YSU, the following recommendations should be incorporated: update and expand program policies to include a youth safety plan; work with the Law Department to develop a contract between the City and CPAL; ensure that program volunteers undergo a vetting process and receive appropriate training; work with the CPD Fiscal Section to confirm that presenters did not receive dual compensation; and include YSU records in CPD's records retention schedule. Implementing these recommendations will ensure that proper internal controls have been established to increase efficiency in YSU programming.

IV. Cincinnati Police Department Response



Date: August 8, 2024
To: Colonel Teresa A. Theetge, Police Chief
From: Captain Joe Richardson, Youth Services Section
Copies to:
Subject: Youth Services Section Response to IA Audit

This memorandum is submitted in response to the recent City Internal Audit of Youth Services Section. IA wording included - YSS' responses are in bold.

Audit Findings and Recommendations

Policies and procedures should be updated and expanded to include a youth safety plan for C.I.T.I. Camp and the Cadet Program.

Policies and procedures are an important management tool and must be current and complete to be effective. Developing clear guidelines for staff to follow when interacting with youth is crucial, as any misconduct or negative interactions that may occur can undermine trust between law enforcement officers and the young people they serve. Additionally, any injury or other harm to youth in these programs may lead to legal liabilities and undermine the credibility of both YSU and CPD.

IA was informed that department policies and procedures are only updated when command changes; YSU's procedures were recently updated on May 14, 2024. However, these documents only include policies and procedures for SROs in the school environment, and do not outline policies for other programs in which they work, such as C.I.T.I. Camp or the Cadet Program. Additionally, these policies and procedures lack child and youth safety guidelines for procedures for staff interaction with youth; rather, officers follow general procedures outlined by CPD that do not focus on protocol for working with severely traumatized juveniles. As such, developing a code of conduct and youth safety plan tailored specifically to YSU helps to protect the youth, CPD officers, and the City as a whole, and this document should be frequently updated to reflect current operations.

Recommendation 1: Update and expand policies and procedures to reflect current operations and include all programs under the YSU umbrella. Additionally, develop a formalized code of conduct and youth safety plan specific to YSU.

Response 1: Agree. YSS will create evidence-based camp specific standard operating procedures that specifically address youth camp operations. This will include safety guidelines and an age-appropriate code of conduct tailored to the officers and participants

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Recommendation 2: Work with the Law Department to develop a contract between the City and CPAL.

Response 2: Agree. While future YSS partnerships with CPAL are not anticipated, in all future camps YSS will defer to the Law Department's recommendations on situation specific needs for memoranda of agreement or other binding directives.

Volunteers have not signed the C.I.T.I. Camp Program Volunteer "General Release of All Claims" Waiver Forms.

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Response 3: Agree. Non-City employees will be required to sign a release of claims prior to involvement in programming or contact with camp participants.

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Recommendation 4: Ensure that there is a record of all YSU volunteers' status and ensure that they have received appropriate training and background checks before working with program youth.

Response 4: Agree. All non-City employees will be subject to a criminal records background check prior to contact with youth.

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Recommendation 5: Work with the CPD Fiscal Section to ensure that any City employees providing services to C.I.T.I. Camp did not receive dual compensation.

Response 5: Agree. No City employees received dual compensation during the 2024 CITI Camp. However, all City employees in future camps will be requested to be assigned to camp activities as their primary duty and compensated according to existing labor agreements and City policies.

Intradepartmental communication between YSU and the CPD Fiscal Section should be strengthened.

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Recommendation 6: Improve communication between YSU and the CPD Fiscal Section to ensure effective internal collaboration and that the City's financial policies are adhered to.

Response 6: Agree. Future camps will be planned in full partnership with CPD Fiscal Section as well as the Personnel Unit and will adhere to City contract and purchasing guidelines.

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Recommendation 7: Create and implement a MOU that clarifies the roles and responsibilities between CRC and YSU.

Recommendation 7: Agree. The City Law department, in consultation with CPD's legal advisors, will be asked to author necessary MOUs for future CITI Camp activities. CPD has already begun to explore an expanded partnership with CRC for future camps.

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Recommendation 8: Establish a succession or cross-training plan to ensure smooth transitions of leadership within YSU.

Response 8: Agree. YSS leadership will develop a succession training plan for the program coordinator position. YSS has already announced that more SROs will be expected to participate in program coordinator duties to better distribute responsibilities and skills in camp planning tasks.

Oversight of YSU data should be strengthened.

Proper management oversight is necessary to ensure that program processes are functioning as intended, errors are detected, and department objectives are being met. When YSU was asked to provide a list of C.I.T.I. Camp program participants, IA found that this information is maintained by a third-party organization. When a third-party organization, whose processes may not align with the City's procedures, is allowed to control data, program operations may be disrupted, and integrating the third party's systems with the City's can be challenging. As such, it is essential that YSU management conducts review and oversight of all program documents, especially youth data, to ensure effective operations and program accountability.

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Previous camp applications were handled by an outside party which resulted in data not being under YSS control. YSS now has a general email address (CPDYouthServices@cincinnati-oh.gov) which will be used for all future camp registrations bringing all data under only CPD control and management.

YSU is not included in CPD's records retention schedule.

The City adheres to the State's Public Records Act, which requires a records retention schedule to ensure that a department has an overview of what records it has stored and how long it has kept them. It also helps to identify whether old files should be archived or disposed of, ensure records are not misplaced, and safeguard sensitive data. Without guidelines on how to retain these documents, YSU cannot confirm that all non-exempted records are available for inspection by the public.

Recommendation 10: Include YSU records in CPD's records retention schedule.

Response 10: Agree. YSS will comply with all records retention guidelines and update it to include any records inadvertently omitted. YSS is transitioning to maximizing the use of as many electronic records as possible so will also update the medium listed on the retention schedule.

CITI Camp sign-in sheet records are incomplete.

Ensuring that every participant in a youth program signs in and out on a daily sign-in sheet is important for safety and accountability, attendance tracking, and program evaluation. When a sign-in/out sheet is incomplete, YSU cannot determine which participants were in attendance upon review; additionally, safety and security of program youth can become compromised if participants are not accounted for at the beginning and end of the day.

YSU provided IA with file folders containing all daily sign-in sheets from 2022, 2023, and 2024. IA then reviewed 29 randomly selected sheets; it was determined that all randomly selected daily sign-in-sheets were available for 2022, only two total daily sign-in sheets were available for 2023, and all but two total sign-in sheets were available from the 2024 folder. IA was unable to locate any of the missing sheets. Additionally, IA determined that 100% of the 29 reviewed sign-in sheets were missing parent signatures at sign-in and/or sign-out. Ensuring that these records are complete is essential to maintaining youth safety, parental assurance, and resource management.

Recommendation 11: Ensure that all sign-in sheet records are maintained and that participants are signed in and out on each daily sign-in sheet.

Recommendation 11: Agree. Part of the increased CITI Camp standard operating procedures will require closer supervision and daily auditing of attendance records. Newly adopted analysis has already started cross referencing attendance records with student pre and post tests for verification of attendance.

Cadet file folders did not contain all the necessary information on the file checklist developed by YSU.

Maintaining accurate and complete documentation of youth information is critical to ensuring that all necessary information is available not only to YSU personnel, but also to a third-party reviewer. Having and adhering to a checklist for the contents of a folder is important for organization, efficiency, preparedness, data loss prevention, and ensuring that important documents are always at hand when needed.

To aid with IA's file review of the Cadet Program, YSU provided IA with an aggregate list of cadets from 2022, 2023, and 2024. IA then selected 20% of cadet files from each year, and evaluated each file by determining whether all necessary information from the YSU cadet checklist was enclosed. IA found that out of 25 reviewed files, 17

(68%) did not contain all components listed on the checklist, such as work permit paperwork, Hamilton County Juvenile Court records requests, and participant photos.

Recommendation 12: Ensure that each participant file folder is accurate, complete, and in compliance with the YSU-developed checklist. Additionally, consider implementing an electronic content management system for more effective and efficient operations.

Response 12: Agree. The Youth Services Section's goal is to use as many electronic records as possible thus minimizing the need for paper records. Of those paper records that must be kept in accordance with records retention, a supervisory audit will be conducted each year at the beginning of the cadet program.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]