



CITY AUDITOR'S OFFICE

Crime Reporting Statistics

April 14, 2022

AUDIT NO. 2007

CITY COUNCIL

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April 14, 2022

Honorable Mayor and Members of the City Council:

Enclosed is the audit report for *Crime Reporting Statistics*, which was included on the Council-approved FY 2021/22 Audit Plan. This audit was conducted to evaluate controls over and reliability of crime reporting statistics.

Based on our review of incident data and the department's quality review process, crime statistics were generally reported accurately, though some quality control processes could be improved. Some aspects of crime reporting can also be improved, such as establishing written procedures, documenting changes to the statute mapping, and presenting crime statistics on the department website.

If you need additional information or have any questions, please contact me at (480) 312-7867.

Sincerely,

A handwritten signature in blue ink that reads "Sharron Walker".

Sharron E. Walker, CPA, CFE, CLEA
City Auditor

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AUDIT HIGHLIGHTS

Crime Reporting Statistics

April 14, 2022

Audit No. 2007

WHY WE DID THIS AUDIT

An audit of Crime Reporting Statistics was included on the City Council-approved fiscal year (FY) 2021/22 Audit Plan. The audit objective was to evaluate controls over and reliability of crime statistics reporting.

BACKGROUND

The Scottsdale Police Department (SPD) reports crime statistics to the Arizona Department of Public Safety's (DPS) Uniform Crime Reporting (UCR) program. Within SPD, the Planning, Research and Accreditation (PRA) unit reviews and submits these crime statistics. DPS compiles all Arizona statistics and sends them to the Federal Bureau of Investigation's (FBI) UCR program.

As of January 1, 2021, SPD submits crime statistics for the National Incident-Based Reporting System (NIBRS), which is more detailed than the previous Summary Reporting System.

NIBRS data is generated from police reports entered in the department's records management system (RMS). Throughout the month, PRA police analysts perform quality reviews of the accuracy of the UCR information before transmitting the monthly data to the DPS system.

This audit reviewed calendar year 2021 crime reporting in NIBRS.

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WHAT WE FOUND

The department can improve its processes to ensure data submitted to and reported by DPS is complete and accurate.

Based on our review of incident data and the department's quality review process, crime statistics were generally reported accurately, though some quality control processes could be improved. We found:

- Inconsistencies in coding incident dispositions resulted in minor errors in the number of crimes and clearances reported. Inconsistencies may also affect the accuracy of internal department data on clearances.
- Because of the transition to the new reporting method, crimes that occurred in the past but were reported to SPD in 2021 are not included in crime statistics.
- Errors and outdated information in the statute mapping table may impact the accuracy of crime reporting.
- Overrides to UCR codes are not routinely documented and reviewed.

Some aspects of crime reporting could be improved.

Specifically, we found:

- Written procedures would help promote consistency in the quality review process, and review of duplicate clearances may no longer be needed.
- A change review and approval process is needed for modifications to the statute mapping.
- 2021 crime statistics are not currently available on the SPD website.

WHAT WE RECOMMEND

We recommend the Police Chief require staff to:

- Clarify reporting procedures to ensure consistency in coding and establish processes to verify the completeness of data submitted to DPS/NIBRS.
- Ensure the statute mapping review is completed and establish a process for managing changes.
- Establish written procedures for the monthly quality review, require override reasons to be documented and reviewed, and evaluate whether the review of duplicate clearances can be eliminated.

MANAGEMENT RESPONSE

The department agreed with the recommendations and plans to complete implementation by the end of calendar year 2022.

BACKGROUND

The Scottsdale Police Department (SPD) reports crime statistics to the Arizona Department of Public Safety's (DPS) Uniform Crime Reporting (UCR) program. DPS compiles and sends statistics for all Arizona law enforcement agencies to the Federal Bureau of Investigation's (FBI) UCR program. Within SPD, the Planning, Research and Accreditation (PRA) unit of the Police Operational Services Bureau reviews and submits the crime statistics.

As of January 1, 2021, SPD submits Incident-Based Reporting (IBR) crime data for the National Incident-Based Reporting System (NIBRS) established by the FBI. In December 2020, the department completed the Arizona DPS certification process required to transition from the previous Summary Reporting System (SRS) to NIBRS.

As indicated by the name, the new incident-based reporting requires detailed data on individual incidents. To accomplish this, the department's records management system (RMS) transmits detailed data files rather than department staff aggregating summary data and submitting a monthly report form. The department's data is transmitted to a DPS system, which validates, combines, and submits statewide data to the FBI for NIBRS.

Incident-Based Reporting

In NIBRS, the FBI defined two levels of crime reporting, Group A and Group B.

- Group A offenses, defined as the “more serious crimes such as Murder, Rape, Robbery”, are reported in more detail.
- Group B offenses “tend to be more minor in nature, such as Curfew/Loitering/Vagrancy Violations, Disorderly Conduct, Driving Under the Influence, etc.” and only the related arrests are reported.

As summarized in Figure 1, on page 4, NIBRS collects 6 segments of data for Group A offenses: Administrative, Offense, Property, Victim, Offender, Arrestee; only arrestee information is collected on Group B offenses. The 71 individual Group A offenses and 10 Group B offenses are referred to as “UCR offense codes.”

(continued on next page)

National Incident-Based Reporting System (NIBRS) History

- 1988-1989 – FBI developed NIBRS.
- 2003 – Arizona DPS certified for NIBRS reporting.
- 2015 – FBI established a deadline of January 1, 2021, for NIBRS-only data collection.
- November 2021 – 18 states were fully participating in NIBRS; 30 states (including Arizona) were partially participating.

SOURCE: Auditor analysis of NIBRS User Manual, DPS training materials, information on www.fbi.gov

Figure 1. Crime Data Reporting Under SRS and NIBRS

Summary Reporting System

RETURN A - MONTHLY RETURN OF OFFENSES KNOWN TO THE POLICE					
This report is authorized by law Title 28, Section 534, U.S. Code. Your cooperation in completing this form will assist the FBI in compiling timely, comprehensive, and accurate data. Please submit this form monthly, by the seventh day after the close of the month, and any questions to the FBI Criminal Justice Information Services Division, Attention: Uniform Crime Reports/Module E-3, 1000 Custer Hollow Road, Clarksburg, West Virginia 26306; telephone 304-625-4830, facsimile 304-625-3566. Under the Paperwork Reduction Act, you are not required to complete this form unless it contains a valid OMB control number. The form takes approximately 10 minutes to complete. Instructions for preparing the form appear on the reverse side.					1-720 (Rev. 02-22-13) OMB No. 1110-9001 Expires 07-31-16
1	2	3	4	5	6
CLASSIFICATION OF OFFENSES	OFFENSES REPORTED OR KNOWN TO POLICE (INCLUDE "UNFOUNDED" AND ATTEMPTS)	UNFOUNDED, I.E., FALSE OR BASELESS COMPLAINTS,	NUMBER OF ACTUAL OFFENSES (COLUMN 1 MINUS COLUMN 3) (INCLUDE ATTEMPTS)	TOTAL OFFENSES CLEARED BY ARREST OR EXCEPTIONAL MEANS (INCLUDES COL. 6)	NUMBER OF CLEARANCES INVOLVING ONLY PERSONS UNDER 18 YEARS OF AGE
1. CRIMINAL HOMICIDE a. MURDER AND NONNEGLIGENT HOMICIDE (Score attempt as aggravated assault) If					

NIBRS

Group A Incident Report Segments

Administrative	<ul style="list-style-type: none"> Incident number, report month/year, report action (reporting, deleting, or adding), incident date, exceptional clearance.
Offense	<ul style="list-style-type: none"> Incident number, UCR offense code, attempted/completed, weapon/force involved, type of criminal activity, bias motivation
Property	<ul style="list-style-type: none"> Type of property loss/ description, property value, date recovered, drug and/or vehicle information (as applicable)
Victim	<ul style="list-style-type: none"> Related UCR offense code, type of victim, age/sex/race/ethnicity/ resident status, type of injury, other circumstance information
Offender	<ul style="list-style-type: none"> Age/sex/race/ethnicity/resident status
Arrestee	<ul style="list-style-type: none"> Arrest number/transaction, arrest date, type, related UCR offense code, weapon data, age/sex/race/ ethnicity/resident status, disposition of arrestees under 18

Group B Arrest Report Segment

Group B Arrest Report	<ul style="list-style-type: none"> Arrest number/transaction, arrest date, type, UCR offense code, weapon data, age/sex/race/ ethnicity/resident status, disposition of arrestee
-----------------------	---

SOURCE: Summary Reporting System Return A form excerpt and auditor analysis of FBI NIBRS guidance documents.

Incidents – In contrast to the previous SRS reporting, which only collected statistics on the most serious offense in an incident, NIBRS collects information about each unique reportable offense that occurred during an incident. This means if an offender committed both robbery and rape in the same incident, both offenses would be reported to NIBRS rather than one offense as would be reported in SRS. However, if the offender is charged with 2 crimes within the same offense code, such as *Aggravated Assault-Disfigurement* and *Aggravated Assault-Deadly Weapon*, only one “Aggravated Assault” is reported. Due to the differences between the SRS and NIBRS reporting standards, it can appear that an agency has higher levels of crime after switching to NIBRS, even if a community’s crime occurrences may not have significantly changed.

Clearances – Incidents may be cleared in one of two ways, by arrest or by exception:

- *Cleared by Arrest* – The first arrest reported in connection with a Group A incident clears the entire incident, even if it includes multiple offenses and/or offenders.¹ NIBRS also collects information such as the arrestee’s age, sex, race, ethnicity, and resident status.
- *Cleared by Exception* - This type is used when the identity and location of the offender(s) are known and sufficient probable cause has been established, but the department is prevented from arresting, charging or prosecuting the offenders due to one of the following reasons:
 - A – Death of offender
 - B – Prosecution declined (for a reason other than lack of probable cause)
 - C – In custody of other jurisdiction (including extradition denied)
 - D – Victim refused to cooperate (in the prosecution)
 - E – Juvenile/No Custody, which is handled through oral or written notice rather than an arrest

Previously, SRS reporting did not distinguish between clearance types, instead summarizing only the number of offenses cleared in the reporting month for the specific offense category.

Crime Data Entry and Validation

At the time of this audit, SPD was using I/LEADS as its records management system (RMS) to create, manage and store its police reports. However, the department is in the process of implementing a new RMS and expects it will be in use by fall of 2022.

When creating an incident report in I/LEADS, police officers select charges from a statute table, which automatically maps to the applicable UCR offense code. DPS provides the UCR code mapping for state statutes, and the department, in collaboration with the City Attorney’s Office, maps local ordinances and codes to the applicable UCR codes. If multiple charges map to the same Group A UCR code, the officer will need to manually override the less severe charges as “999” (“Not Reportable”) to avoid reporting duplicate offenses within the same incident. As well, when mutually exclusive offense codes, such as “Aggravated Assault” and “Simple Assault” are recorded for the same victim, the manual override is needed for the lesser charge. Overall, about 70% of incidents only comprised one charge. Also, offenses that are not reportable under the Uniform Crime Reporting program, such as citations and traffic violations, are coded to “999.”

After data entry, the officer runs an “IBR Validation” function, which prompts correction of errors such as duplicate UCR offense codes, mutually exclusive offenses, missing required fields, or incompatible information. For the primary incident report, I/LEADS requires all errors to be resolved before the report

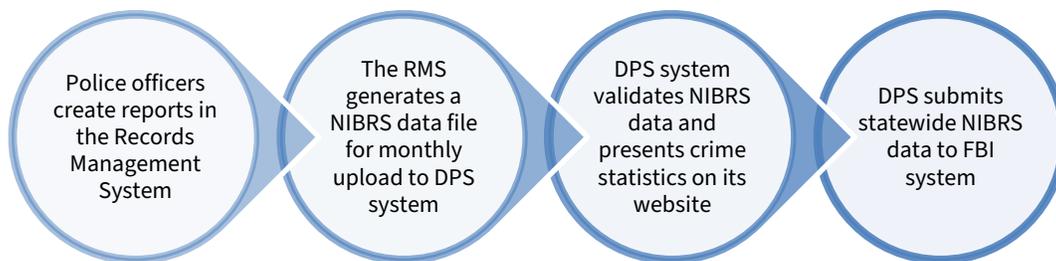
¹ Group B offenses are only reported when there is an arrest. They do not have to be cleared.

can be approved. However, the department uses supplemental reports for various purposes, such as attaching lab results, and IBR Validation is optional for those since, according to PRA, it was creating too many errors.

Monthly Quality Control Review

Before generating the monthly NIBRS data file from I/LEADS to upload to the DPS portal, as shown in Figure 2, PRA runs the IBR validation for the month's records, including supplemental reports and corrects any errors. PRA has assigned three Police Analysts with UCR training and experience to perform monthly quality reviews of the NIBRS data. Throughout the month, they review crime against persons (Persons Crime) incidents using a quality review checklist, verifying the accuracy of offense, weapons, offender, and clearance codes, and other common reporting issues, such as duplicate clearances. PRA staff are to note their corrections in the incident's comment field.

Figure 2. NIBRS Data Reporting



SOURCE: Auditor analysis of SPD and NIBRS reporting processes.

Public Reporting of Crime Statistics

Since the January 1, 2021, transition to NIBRS, SPD has not issued summarized public reports of its 2021 crime statistics. The department provides Open Data files of incidents, arrests, and bookings on the City's website. In addition, DPS maintains an Arizona Crime Statistics website that is continuously updated with each monthly NIBRS submission. This site provides a dashboard of key crime statistics and allows users to build their own reports from the available data.

Because SPD only began NIBRS reporting in 2021 and many Arizona jurisdictions still have not transitioned to it, trend information is not yet available from the NIBRS data. So instead, DPS reports the NIBRS data using "Summary" level offenses.

For example, as shown in Figure 3, the 5-Year Trend data illustrates Violent Crime by applying the SRS Hierarchy Rule to offense categories: *Criminal Homicide, Forcible*

SRS Hierarchy Rule

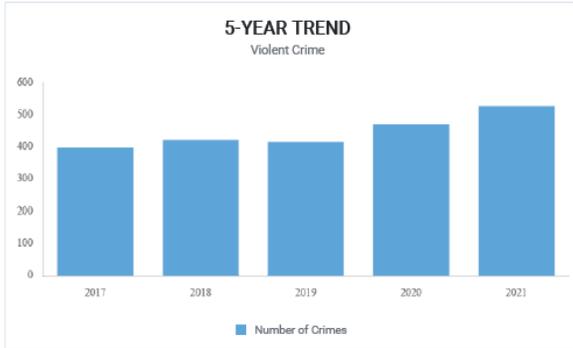
"In the SRS, offenses are ranked in terms of severity, and only the highest-ranked offense is reported in incidents which have multiple offense types." Arson and Human Trafficking are always reported.

NIBRS does not apply the Hierarchy Rule.

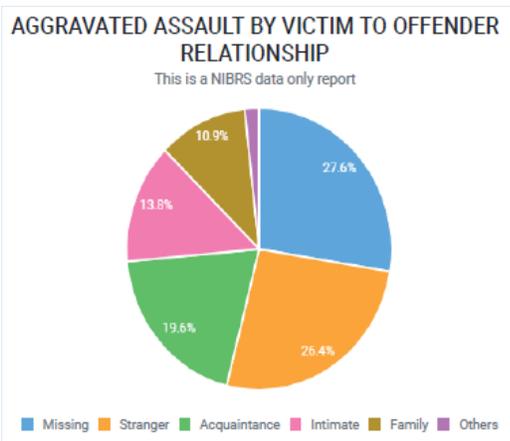
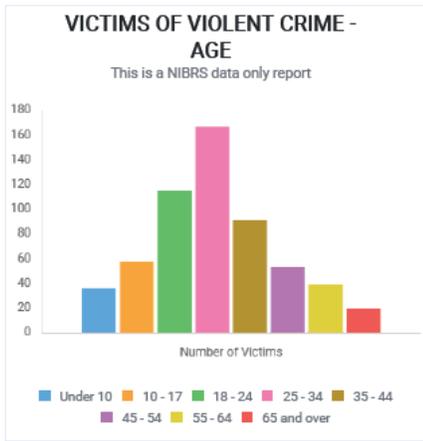
Rape, Robbery, Aggravated Assault. As also shown in Figure 3, more detailed information is available from the NIBRS data, but Violent Crime is defined with these more specific categories: *Murder and Nonnegligent Manslaughter, Negligent Manslaughter, Rape, Sodomy, Sexual Assault with an Object, Fondling, Robbery and Aggravated Assault.*

Figure 3. Examples of Scottsdale PD 2021 Crime Statistics: SRS and NIBRS

Crime trends are reported using SRS scoring.



NIBRS data, available for 2021 and after, provides more in-depth information about crimes.



SOURCE: Downloaded from <http://azcrimestatistics.azdps.gov>: calendar year 2021 data for Scottsdale Police Department, as of March 15, 2022.

OBJECTIVES, SCOPE, AND METHODOLOGY

An audit of *Crime Reporting Statistics* was included on the City Council-approved fiscal year (FY) 2021/22 Audit Plan. The audit objective was to evaluate controls over and reliability of crime statistics reporting.

Given the department's January 1, 2021, transition from the Summary Reporting System (SRS) to the National Incident-Based Reporting System (NIBRS) and pending change to a new records management system (RMS) later in 2022, we focused this audit on calendar year 2021 crime reporting in NIBRS and the data validation controls that would be applicable to any records management system.

To gain an understanding of the crime reporting process and identify key management controls, we interviewed members of the Scottsdale Police Department's (SPD) Operational Services Bureau, including the Director of Strategic Initiatives, Police Analysts and the Systems Integrator in the Planning, Research and Accreditation (PRA) unit. We also reviewed SPD Operation Orders, internal memoranda, and training materials to gain an understanding of crime reporting policies and procedures. Additionally, we reviewed relevant guidance from the Arizona Department of Public Safety (DPS) and the Federal Bureau of Investigations (FBI), including the following publications and documents:

- *2021.1 National Incident-Based Reporting System User Manual*, issued April 15, 2021, by the FBI's Criminal Justice Information Services Division.
- *2019.2.1 National Incident-Based Reporting System Technical Specifications*, issued June 15, 2020, by the FBI's Criminal Justice Information Services Division.
- *National Incident-Based Reporting System (NIBRS) Implementation Packet*, issued by DPS and related documents submitted by SPD for its NIBRS certification.
- *Arizona National Incident-Based Reporting System, Technical Specification*, issued in March 2020 by DPS.

To evaluate controls over and reliability of the crime data reported, we:

- Assessed the training and experience of SPD's PRA staff who perform the daily quality control reviews of UCR coding and other technical aspects of the NIBRS reporting requirements. Based on this review, we determined we could rely on their technical expertise with data coding and NIBRS requirements.
- Conducted interviews with PRA staff and observed their validation and correction processes to identify key controls for NIBRS reporting. We evaluated whether the department had put in place quality control processes to assure crime data coding accuracy.
- Reviewed and analyzed data on UCR code overrides and corrections, along with any available related PRA documentation.
- Compiled the I/LEADS-generated monthly NIBRS data files and compared them to DPS-reported data and statistics to evaluate data transmission and reporting accuracy. We focused data validation testing on Group A incidents, offense codes, victim counts, and arrest counts and Group B arrest counts. Since we did not find significant differences, we did not further validate the victim, offense, and offender descriptive data. Additionally, we did not validate DPS's conversion of NIBRS data to the SRS trend data presented on the crime statistics website.
- Compared incident data in I/LEADS to the NIBRS data generated and reported for Scottsdale. For calendar year 2021, the I/LEADS incident data included approximately 22,700 incidents,

including those that did not contain UCR-reportable offenses. We did not validate detailed arrest or victim data from I/LEADS to NIBRS.

- Reviewed SPD's mapping of state and local laws to UCR codes, identifying any significant differences to DPS's mapping of state laws, and evaluated the department's change control procedures for updating the UCR mapping.

Our audit found that the department can improve its processes to ensure data submitted to and reported by DPS is complete and accurate. Some aspects of crime reporting could be improved, such as establishing written procedures, documenting changes to the statute mapping, and presenting crime statistics on the department website.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Audit work took place from November 2021 to March 2022.

FINDINGS AND ANALYSIS

1. The department can improve its processes to ensure data submitted to and reported by DPS is complete and accurate.

Based on our review of incident data and the department's quality review process, crime statistics were generally reported accurately, though some quality control processes could be improved. Since the transition to more detailed NIBRS reporting, the department has not yet developed a process to routinely review the completeness of submitted data and confirm the accuracy of DPS publicly reported statistics. Without a comparison of I/LEADS data to DPS and NIBRS public data, the department is not aware of discrepancies that occur. While the inconsistencies in coding resulted in minor errors in the number of crimes and clearances reported to NIBRS during the first year, these may accumulate over time to become more significant.

2021 Reported NIBRS Incidents

- 12,802 Incidents, which had 15,921 Group A offenses
- 2,866 Group B arrests

SOURCE: Auditor analysis of DPS system reports as of February 8, 2022.

A. All Group A offenses, except cancelled reports and those with "Unfounded" dispositions, are reported to NIBRS. While the impact is relatively minor to date, coding inconsistencies affected the reporting of crimes or their clearances:²

1. Inconsistent disposition or case status fields.

- In 8 noted instances, the case status was coded as *Unfounded* but the disposition field was left blank or set to *Inactive*. Because I/LEADS uses the disposition field, not the case status field, to report certain NIBRS data, these unfounded cases were not deleted from the NIBRS reporting. Most Unfounded incidents are determined within the same month they are reported, so they are not submitted to NIBRS. When the disposition timing is delayed, the incident is submitted to NIBRS when it is reported and later an update is sent to delete the incident. However, if the disposition field is not completed, I/LEADS fails to generate an update entry to delete the Unfounded incident report from NIBRS.
- Five reports with a *Cancelled* case status were submitted to DPS during 2021. There is not a specific disposition code to cancel incident reports. Instead, according to PRA, incidents should be cancelled before offense details are entered into I/LEADS or the entered data should be deleted. Almost 800 other cancelled reports in I/LEADS were coded as *Not Reportable* and not transmitted in the NIBRS file.

Unfounded - An incident report is coded as Unfounded if, after police investigation, it is determined that no crime was committed.

² The specific instances noted are limited to Group A offenses and do not include Group B offenses or not reportable crimes. Additionally, Persons crimes and vehicle thefts are multiplied by the number of victims or vehicles affected. We did not apply those factors when summarizing the number of discrepancies.

2. Inconsistent internal and NIBRS/DPS clearances.

Cleared by Arrest discrepancies included:

- Reported by DPS but not shown in I/LEADS – NIBRS clears an incident by arrest when the first arrest is made under that incident. This information is obtained from the arrest report data submitted. For about 180 offenses, or 3.4% of Scottsdale’s Group A offenses, DPS had cleared the offense based on arrest data, but I/LEADS did not show a *Cleared by Arrest* disposition. Instead, these dispositions were blank, *cleared by exception*, or *inactive*. Based on our discussions with PRA, this may occur if the officer does not select to update the disposition after entering an arrest report. As a result, internal data on clearances by arrest may be inaccurate.
- Not reported by DPS but recorded in I/LEADS – In about 25 Group A offenses, SPD had entered a “*Cleared by Arrest*” disposition, but an arrest was not reported to DPS in NIBRS data. Although there was an arrest record, it was not properly linked to the NIBRS offense and therefore not reported to NIBRS.

Cleared by Exception discrepancies included:

- For 53 offenses in I/LEADS where the case status was recorded as *Cleared by Exception*, the case was not cleared in NIBRS reporting. In 37 of these, a non-NIBRS code was used for the clearance and, therefore, the update was not correctly transmitted. Extraneous codes should be removed from the options list so that users do not select them. The remaining 16 had blank or *Inactive* dispositions and so were not cleared in NIBRS; because of the cleared status code, these need further departmental review.

In 31 of the 37 with non-NIBRS codes, “*CBOA – Arrested by Another Agency*” was used. Using the NIBRS code “*C*” for *Cleared by Exception, In Custody of Other Jurisdiction* would have cleared the incidents.

- In addition, according to PRA, incidents that required SPD to file a report with county prosecutors were previously cleared by exception because the arrest by the county or other jurisdiction may not be communicated back to SPD. In NIBRS, this is not an allowable exceptional clearance, so SPD no longer automatically clears these cases. However, the lack of an established communication method for these interjurisdictional arrests may result in case clearances not being reported in NIBRS. As of February 2022, SPD had more than 300 Group A offenses of this type for 2021 that had not yet been cleared.

According to PRA, cases with *Unfounded* disposition are reviewed monthly to ensure the disposition was appropriate. However, this is not listed on the monthly review checklist. As well, review steps are needed to check cancelled reports and cases where the status and disposition combinations may result in inaccurate reporting of crimes and clearances. Further, written guidelines are needed regarding the UCR reporting review’s objective and the resolution process for any issues identified.

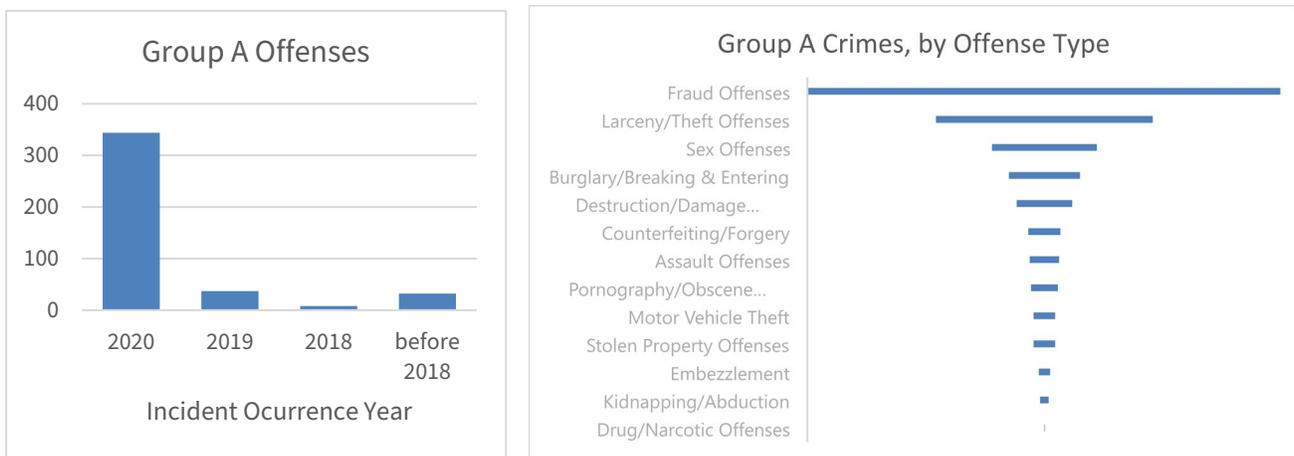
- B. Because of the change to the new reporting method, some incidents and clearances were not submitted due to timing gaps. Incidents that occurred prior to SPD’s NIBRS start date of January 1, 2021, but were reported to SPD during 2021, were not reportable to NIBRS. Similarly,

clearances that occurred in 2021 of a crime from an earlier year were not included in the NIBRS clearance numbers.

In NIBRS, crimes and their associated clearances are presented based on when the crime occurred. This is a significant shift from SRS, which collected crime and clearance data based on when they were reported.

Approximately 400 Group A offenses reported to SPD in 2021 were not reportable to NIBRS because the incident date was in a prior year. Also, arrests and 23 exceptional clearances that occurred in 2021 for earlier years' crimes were rejected by the DPS system.

Figure 4. Summary of Group A Offenses Reported to SPD in 2021 but Occurred in a Prior Year



SOURCE: Auditor analysis of otherwise reportable offenses that were not submitted to NIBRS/DPS.

As shown in Figure 4, most prior year crimes reported in 2021 occurred in 2020 and, by type, about 40% were Fraud offenses. While the overall impact is only about 2.7% of the offenses reported to SPD in 2021, the potential impact of crimes and clearances not submitted because of the change in reporting may be more significant depending on the data being cited. DPS currently shows year-to-year trends by converting the detailed NIBRS data back to the SRS summary format. However, those reported trends will also exclude these unreported crimes and clearances and the department should evaluate the significance of this gap in reporting.

- C. Errors in the statute mapping and outdated charges may impact the accuracy of crime reporting. While PRA reviews the coding accuracy of incidents involving Persons crimes, reviewing individual case files can be very time consuming and Person crimes comprised only 13% of the Group A offenses reported in 2021. Therefore, SPD is relying on its I/LEADS statute mapping table to properly code most crimes.³

³ This statute mapping includes federal statutes, state statutes and liquor laws, City ordinances, and Arizona court rules, so keeping the table up to date is important to accurate reporting.

Because DPS’s statute listing was last updated in December 2017, DPS staff have directed SPD to always follow the definitions from the most current NIBRS User Manual and FBI guidance. The department started a more in-depth review of the statute mapping in January 2022 as it prepares to migrate to a new records management system.

Overall, as shown in Table 1, we found that 76% of the UCR codes in the SPD statute list matched the UCR codes in the DPS statute list, 17% did not match, and 7% partially matched by having only one of a series of acceptable UCR codes for the particular statute.

Table 1. Comparison of UCR Codes in SPD Statute Table and DPS Statute List

	Group A		Group B		Not Reportable		Total	
Matches UCR Code	503	64%	584	87%	68	89%	1,155	76%
Partial Match of UCR Code ^a	74	10%	31	5%			105	7%
Different UCR Code	201	26%	53	8%	8	11%	262	17%
Total	778	100%	668	100%	76	100%	1,522	100%

^a Matches one of a series of acceptable UCR codes for a particular statute.

SOURCE: Auditor analysis of I/LEADS Statute table and DPS Statute list.

Specific examples of errors and discrepancies included the following:

- Five offenses in the SPD statute table reference the same statute and description but have different UCR codes. Because the offense is reported to the FBI using the UCR code, having the same statute with different codes could result in offenses that are incorrectly reported to the FBI.
 - Seven statutes referenced an invalid statute or statute sections, which indicate that some information may be outdated.
 - SPD’s statute mapping table lists 24 reportable offenses that DPS categorizes as not reportable and 8 offenses are listed as not reportable that DPS lists as reportable. One of the 8 offenses that SPD has identified as not reportable is a Group A offense.
 - Additionally, 105 statutes on the DPS statute listing have multiple allowable UCR codes and SPD chose a single UCR code for its statute mapping table.
- D. Overrides to the default UCR codes are not routinely documented and reviewed. While these code overrides are logged by the system, adding explanatory comments in the Case Management module is optional.
- Analysis of the change logs shows that many officer UCR code overrides were to change a UCR code to “999” (Not Reportable). I/LEADS prompts the officer to do this when more than one charge code maps to the same UCR offense code or if mutually exclusive offenses were entered. However, overrides may be made for other reasons and, without explanatory

comments, a supervisor would have to review the detailed case documentation to evaluate the coding change.

PRA currently reviews 999 overrides to the first (the most severe) offense by running a system report monthly and reviewing each incident's documentation. However, other code overrides are not reviewed. Also, requiring explanatory comments would make review of overrides easier.

- When correcting UCR coding during monthly reviews, PRA analysts generally add comments to the case management notes. The recorded change comments are exported into a report but are not reviewed by supervisors.

Requiring explanatory code override reasons would facilitate supervisory review and also allow the department to identify common errors that may be corrected through training or guidance.

Recommendations:

The Police Chief should require staff to:

- A. Clarify reporting procedures to ensure consistency in disposition coding, eliminating other options that may lead to incorrect coding, and add quality review procedures to identify potentially incorrect or unreported offenses. Additionally, work with other jurisdictions to develop a method to communicate arrests made for each other's warrants so that NIBRS clearances are complete.
- B. Establish processes to routinely compare SPD incident data to data reported by DPS/NIBRS and evaluate the significance of any differences, such as unreported prior year incidents.
- C. Complete its review of the statute mapping table and document the reasons and approvals for variances from the DPS statute list.
- D. Document override reasons in the case comments, including the reason for the override.

2. Some aspects of crime reporting could be improved.

In addition to incorporating validation methods as described in Finding 1, improvements could be made to the monthly quality review process, statute mapping changes, and public reporting of crime statistics.

- A. As the department gains more familiarity with submitting crime data through NIBRS, and refines its monthly review checklist, written procedures are needed to help promote consistency in the review process. Additionally, although PRA staff review many incidents monthly, current procedures do not identify which incidents have been reviewed unless a change is logged by the system and the analyst noted comments. One analyst used a manual approach, printing a list of the incidents to be reviewed and manually marking them as reviewed and/or modified. But this was not a required practice. Also, this manual tracking is difficult because police reports are continuously being updated and added, so the incidents to be reviewed are frequently changing. As a result, much of the quality control process is undocumented in the current records management system.

- B. The PRA practice of reviewing for duplicate clearances appears to be unnecessary. To avoid reporting more than one clearance for each offense, PRA looks for incidents where the disposition date was later than the initial incident report and checks whether the correct disposition date was entered. Disposition dates are updated when the disposition changes or when another arrest is added.

However, according to the NIBRS User Manual, a Clearance by Arrest is determined upon the first arrest report for that incident, and each incident can only have one clearance associated with it. Also, an incident cleared by arrest cannot later be cleared by exception in NIBRS. In 2021 PRA made over 600 changes related to clearance dates. Eliminating or further narrowing the parameters of this review could reduce staff's review time or allow time to review for different types of potential errors.

- C. A change review and approval process is needed for modifications to the statute mapping table in the records management system.

Changes to the statute table may be initiated for various reason, including updates to laws or FBI guidelines for UCR coding. The Police Technology Services Division or the PRA system integrator is requested to implement the change. However, PRA does not currently have a process in place for documenting the requested change and confirming that the completed change functions as intended. For 12 of the 14 changes we sampled, the justification and prior approval could not be located.

- D. After the NIBRS conversion, SPD has not compiled and presented crime statistics on its website. The department provides incident report and arrest data for the past year through the City's Open Data portal, though this data does not provide the UCR codes used to categorize crime statistics.⁴ Further, SPD's Crime Statistics website does not direct users to the DPS or FBI crime statistics websites for alternatives to analyzing the Open Data. The DPS website is updating crime data as it is submitted; the FBI released its 2021 data in late March 2022.

In response to law enforcement agencies' concerns that the more detailed NIBRS reporting could cause a public perception of increased crime, a 2015 FBI study concluded that the SRS-to-NIBRS transition resulted in a 2.1% increase in the total number of reported crimes for the data studied. However, the reporting of more severe crimes, such as murder and rape, was not impacted by the reporting system change. To help communicate differences to the public, the study suggested that law enforcement agencies consider showing NIBRS data side-by-side with NIBRS data that has been converted to SRS data for a few years after the transition. A 2019 update to this study showed slightly larger reporting differences, but still concluded that the benefits of more accurate and robust crime information outweigh the apparent increase the numbers may show.

Recommendations:

The Police Chief should require staff to:

- A. Create written procedures for the quality review process.

⁴ This data is limited to only the first offense if an incident involves multiple offenses and does not include cases involving juveniles.

- B. Evaluate whether the monthly review of duplicate clearances can be eliminated.
- C. Establish a UCR code change management process that includes documented requests along with review and approval of the completed change.
- D. Provide information on the department's website about the City's crime statistics, whether through internally developed reporting or links to state and federal crime statistics websites. Consider developing a report on current crime statistics illustrating both the previous SRS and the current NIBRS data.

MANAGEMENT ACTION PLAN

1. The department can improve its processes to ensure data submitted to and reported by DPS is complete and accurate.

Recommendations:

The Police Chief should require staff to:

- A. Clarify reporting procedures to ensure consistency in disposition coding, eliminating other options that may lead to incorrect coding, and add quality review procedures to identify potentially incorrect or unreported offenses. Additionally, work with other jurisdictions to develop a method to communicate arrests made for each other's warrants so that NIBRS clearances are complete.
- B. Establish processes to routinely compare SPD incident data to data reported by DPS/NIBRS and evaluate the significance of any differences, such as unreported prior year incidents.
- C. Complete its review of the statute mapping table and document the reasons and approvals for variances from the DPS statute list.
- D. Document override reasons in the case comments, including the reason for the override.

MANAGEMENT RESPONSE: Agree

PROPOSED RESOLUTION:

- A. Development for the new Records Management System (RMS), Mark43, requires that all NIBRS related fields are mandatory and exclusively set to NIBRS technical requirements. Quality review procedures will be created for the new system, and staff training on these procedures will occur before implementation. Staff will initiate conversations with partners on ways to increase communication for warrants and other NIBRS related impacts.
- B. With the implementation of the new RMS, Planning, Research, and Accreditation (PRA) staff will identify ongoing audit processes to routinely compare submission data.
- C. Staff has completed an in-depth evaluation of the statute table for the development of the new RMS to ensure the most accurate information for implementation. Staff will identify any deviations in a tracking mechanism.
- D. The workflow process related to code overrides will be modified in Mark43, lessening the opportunities for staff to change codes. The process for overrides will be identified in the new system for ongoing tracking by staff authorized to make changes to the report.

RESPONSIBLE PARTY: Police Operational Support Director Cassie Johnson

COMPLETED BY: 12/31/2022

2. Some aspects of crime reporting could be improved.

Recommendations:

The Police Chief should require staff to:

- A. Create written procedures for the quality review process.
- B. Evaluate whether the monthly review of duplicate clearances can be eliminated.
- C. Establish a UCR code change management process that includes documented requests along with review and approval of the completed change.
- D. Provide information on the department's website about the City's crime statistics, whether through internally developed reporting or links to state and federal crime statistics websites. Consider developing a report on current crime statistics illustrating both the previous SRS and the current NIBRS data.

MANAGEMENT RESPONSE: Agree

PROPOSED RESOLUTION:

- A. Quality review procedures and training guidelines will be written specific to the new RMS.
- B. PRA staff will continue to monitor clearances for potential duplication until such time that it is no longer necessary due to time in NIBRS reporting or RMS changes. As we move further from reporting Summary reporting, opportunities for pre-NIBRS incidents lessen.
- C. Staff will include changes to State or City-specific code fields in the existing Cherwell process, including justification and supporting information for changes required. Any federal level changes will be made at the system level by Mark43 in RMS. Mark43 communicates all system-level changes to their customers through routine communication.
- D. The Department's website will be updated to include links to the FBI and DPS crime data dashboards. These dashboards include both summary and NIBRS as reported by the department.

RESPONSIBLE PARTY: Police Operational Support Director Cassie Johnson

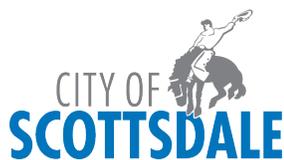
COMPLETED BY: 12/31/2022

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