#### Memorandum



**DATE:** March 24, 2025

To: Honorable Members of the Government Performance & Financial Management Committee: Chad West (Chair), Paula Blackmon (Vice Chair), Cara Mendelsohn, Jesse Moreno, Jaime Resendez

**SUBJECT:** Internal Audit Reports Released Between February 15, 2025, and March 14, 2025

Attached for your review is the Office of the City Auditor audit report released between February 15, 2025, and March 14, 2025. The full reports are included in Attachment 1. Exhibit 1 summarizes the number of report recommendations accepted by city management.

#### Exhibit 1:

#### Summary of Audit Report Recommendations Accepted

Audit Report Title	Report Recommendations			
	Accepted	Total	Percentage	
Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111	0	0	N/A	
Special Audit of Former City Council Members	0	0	N/A	
Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence	8	9	89%	
Audit of Dallas 311 Call Center Performance	3	4	75%	

If you have any questions, please contact me at (214) 670-3222 or mark.swann@dallas.gov.

Sincerely,

Mark S. Swann

Mark S. Swann

City Auditor

Internal Audit Report Released Between February 15, 2025, and March 14, 2025 March 24, 2025 Page 2 of 2

#### Attachment

C: Kimberly Bizor Tolbert, City Manager

Tammy Palomino, City Attorney

Bilierae Johnson, City Secretary

Preston Robinson, Administrative Judge

Bart Bevers, Inspector General (I)

Dominique Artis, Chief of Public Safety

Dev Rastogi, Assistant City Manager

M. Elizabeth (Liz) Cedillo-Pereira, Assistant City Manager

Alina Ciocan, Assistant City Manager

Donzell Gipson, Assistant City Manager

Robin Bentley, Assistant City Manager

Jack Ireland, Chief Financial Officer

Elizabeth Saab, Chief of Strategy, Engagement, and Alignment (I)

Sheri Kowalski, City Controller

**Directors and Assistant Directors** 

Alpha Jalloh, Assistant Director – Financial Compliance, Auditing & Monitoring

Jeffrey Brill, Manager – Financial Compliance, Auditing & Monitoring



# Reports Released

- Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111 (February 24, 2025)
- 2. Special Audit of Former City Council Members (February 28, 2025)
- 3. Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence (March 13, 2025)
- 4. Audit of Dallas 311 Call Center Performance (March 14, 2025)

#### Memorandum



DATE: February 24, 2025

Jennifer Nicewander, Director – Office of Bond and Construction Management

To:
Juanita Ortiz, Director (I) – Office of Procurement Services

Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111

We understand that management has cancelled all proposals and the solicitation. Attached for your review is the *Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111.* We understand all bids are being rejected. The Agreed-Upon Procedures are included in Attachment 1. No exceptions were noted.

We have performed these procedures, which were agreed to by the Office of Bond and Construction Management and the Office of Procurement Services, solely to assist the City of Dallas City Council in evaluating the Office of Bond and Construction Management's and the Office of Procurement Services' compliance with the requirements of Administrative Directive 4-05, Contracting Standards and Procedures, relevant State of Texas statutes, and City of Dallas contracting and delivery procedures. The Office of Bond and Construction Management is responsible for the establishment of policies and procedures to comply with those requirements.

If you have any questions, please contact me at 615-974-8700 or mark.swann@dallas.gov.

Sincerely,

Mark S. Swann City Auditor Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111
February 24, 2025
Page 2 of 2

#### Attachment

C: Honorable Mayor and Members of the City Council
Kimberly Bizor Tolbert, City Manager
Tammy Palomino, City Attorney
Bilierae Johnson, City Secretary
Bart Bevers, Inspector General (I)
Dev Rastogi, Assistant City Manager
Donzell Gipson, Assistant City Manager
Elizabeth Saab, Chief of Staff Strategy, Engagement, and Alignment (I)
Jack Ireland, Chief Financial Officer
Efrain Trejo, Assistant Director, Office of Bond and Construction Management
Sheri Kowalski, City Controller
Alpha Jolla, Assistant Director – Financial Compliance, Auditing & Monitoring
Jeffrey Brill, Manager – Financial Compliance, Auditing, & Monitoring

#### OFFICE OF THE CITY AUDITOR – FINAL REPORT



Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy – CIZ24-BCM-3111

February 24, 2025

# Mark S. Swann, City Auditor

Mayor	Council Members	
Eric L. Johnson	Carolyn King Arnold	Jaime Resendez
Mayor Pro Tem	Paula Blackmon	Paul E. Ridley
Tennell Atkins	Zarin D. Gracey	Jaynie Schultz
Deputy Mayor Pro Tem	Cara Mendelsohn	Kathy Stewart
Adam Bazaldua	Jesse Moreno	Chad West
	Omar Narvaez	Gay Donnell Willis



# **Executive Summary**

# Objective and Scope

The objective of the agreed-upon procedures attestation engagement is solely to assist the City of Dallas City Council in evaluating the Office of Bond and Construction Management's and the Office of Procurement Services' compliance with the requirements of City of Dallas Administrative Directive 4-05, Contracting Standards and Procedures, relevant State of Texas statutes, and City of Dallas contracting and delivery procedures.

The Office of Bond and Construction
Management requested this attestation in
accordance with Administrative Directive 4-05,
Section 9.5.5, Attestation Engagement
Requirement for All Construction Projects \$50
Million and Greater.

# Background

We understand that management has cancelled all proposals and the solicitation.

The Dallas Police Training Academy will replace the current facility that is located in a stretch of rental space in an industrial strip in the Red Bird area of southern Dallas. The current facility was meant to be temporary when it opened in 1990.

The project is to be completed in two phases. This procurement is to find Construction Manager at Risk for the project.

The University of North Texas at Dallas is the owner of a portion of the property comprising the total Project Site. The City of Dallas intends to accept a ground lease of the Project Site from the University of North Texas at Dallas and will be the owner of this Project. The total combined project site area is approximately 7.426 acres.

#### **Observed Conditions**

No exceptions were found for the 17 Agreed-Upon procedures. See Attachment 1 for the full list of procedures.

## Results

#### Independent Agreed-Upon Procedures Report

The Office of the City Auditor conducted the procedures described in Attachment 1, which were agreed to by the Office of Bond and Construction Management and the Office of Procurement Services, solely to assist the City of Dallas City Council in evaluating the Office of Bond and Construction Management and the Office of Procurement Services' compliance with the requirements of with the requirements of Administrative Directive 4-05, *Contracting Standards and Procedures*, relevant State of Texas statutes, and City of Dallas contracting and delivery procedures.

The Office of Bond and Construction Management and the Office of Procurement Services are responsible for the establishment of policies and procedures to comply with those requirements. The sufficiency of these agreed-upon procedures is solely the responsibility of the parties specified in the report. Consequently, we make no representation regarding the sufficiency of the procedures described in Attachment 1, either for the purpose for which this report has been requested or for any other purpose.

We understand that management has cancelled all proposals and the solicitation. No exceptions were noted for the Agreed-Upon Procedures. See Attachment 1 for a list of the procedures performed.

The Office of Bond and Construction Management requested this attestation on February 26, 2024, in compliance with the requirements of Administrative Directive 4-05, *Contracting Standards and Procedures*. The Office of the City Auditor completed the agreed-upon procedures on February 24, 2025. No exceptions were noted.

The purpose of this report on applying agreed-upon procedures is intended solely for the information and use of the Dallas City Council and City management and is not intended to be and should not be used by anyone other than these specified parties. Accordingly, this report is not suitable for any other purpose. The Office of the City Auditor was not engaged to and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on compliance. Accordingly, the Office of the City Auditor does not express such an opinion or conclusion. Had additional procedures been performed, other matters might have been identified that would have been reported.

We are required to be independent of the Office of Bond and Construction Management and the Office of Procurement Services and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement. The agreed-upon procedures were conducted in accordance with the United States generally accepted government auditing standards which incorporate attestation standards established by the American Institute of Certified Public Accountants.

Signature:

Mark S. Swann

Mark S. Swann, CPA City Auditor City of Dallas, Texas

2/24/2025

# **Attachment 1:** Agreed-Upon Procedures

Independent Report on Agreed-Upon Procedures for: Attestation Engagement for Construction Manager at Risk Services for Dallas Police Training Academy -- CIZ24 - BCM- 3111

2/24/2025

# Agreed-Upon Procedures

As stated in Administrative Directive 4-05, Contracting Standards and Procedures, Section 9.5.5:

(a) Confirm the documentation to support the procurement is provided by the Office of Bond and Construction Management and other applicable City departments.

#### No exceptions.

(b) Confirm solicitation procedures complied with Administrative Directive 4-05, *Contracting Standards and Procedures*, City Ordinances, application State Laws and departmental policies and procedures.

#### No exceptions.

(c) Confirm the scope of work/specifications were written in a manner that promotes competition and competitive pricing.

#### No exceptions.

(d) Confirm the specification identify the criteria for which the Office of Bond and Construction Management could determine that a bid is responsive and responsible.

#### No exceptions.

(e) Confirm that the Office of Bond and Construction Management performed due diligence when developing the bid specifications by consulting with other departments, such as the City Attorney's Office, and documenting the consultation.

#### No exceptions.

(f) Confirm the procurement was advertised appropriately in accordance with State law.

#### No exceptions.

(g) Confirm the Office of Bond and Construction Management used appropriate commodity code(s) to send notifications to the vending community from the City's solicitation system.

#### No exceptions.

(h) Confirm the Office of Bond and Construction Management sent solicitation notices and addenda (if applicable) to the vending community with sufficient time for response.

#### No exceptions.

(i) Confirm the Office of Bond and Construction Management held a pre-bid meeting, if applicable.

#### No exceptions.

(j) Confirm the specifications were posted for a reasonable period of time on the City's solicitation system.

#### No exceptions.

(k) Confirm the Office of Bond and Construction Management obtained appropriate nondisclosure and conflict of interest forms for any consultants and/or subject matter experts used in the procurement process, if applicable. Additionally, if applicable, confirm the Office of Bond and Construction Management included conflict-of-interest and nondisclosure policy language in the scope of work/specifications.

#### No exceptions.

(l) Confirm the City received sealed bids/proposals within the due date and time, opened them, and subsequently read them in compliance with State law.

#### No exceptions.

(m) Confirm the City received and evaluated the bids/proposals and found them to meet the minimum requirements/qualifications for low bid OR that the most advantageous proposer was determined based on the published evaluation criteria.

#### No exceptions.

(n) Confirm the Office of Bond and Construction Management performed due diligence when a bidder is disqualified or in the event of a bid protest by consulting with the City Attorney's Office and informed the City Council of a bid protest and response in accordance with Administrative Directive 4-05, Contracting Standards and Procedures, 9.5.3.

#### No exceptions.

(o) Obtain a representation from the Small Business Center that the Small Business Center followed the City's Business Inclusion and Development policies outlined by City Council.

#### No exceptions.

(p) Confirm the Office of Bond and Construction Management review and evaluation process confirmed the lowest bid or highest ranked vendor, and that the Office of Bond and Construction Management appropriately documented the determination.

## No exceptions.

(q) Confirm the Office of Bond and Construction Management used the Federal System for Award Management website to confirm that the lowest responsible bidder is not currently excluded.

No exceptions.

#### Memorandum



DATE: February 28, 2025

To: Honorable Mayor and Member of the City Council

**SUBJECT:** Special Audit of Former City Council Members

The Office of the City Auditor is required by City Charter Chapter IX, Section 4, *Special Audit*, to audit the accounts of former City officials upon their death, resignation, removal, or expiration of term to determine any indebtedness to the City.

This audit addressed the accounts of former City Council Members Casey Thomas II and B. Adam McGough. The scope of this audit is from July 1, 2021 through June 30, 2023, to determine whether the Mayor and City Council staff: (1) controlled and accounted for City personal property used by/for the former City Council Members; (2) ensured the former City Council Members officeholder account expenditures were for a public purpose; (3) ensured the former City Council Members were removed as authorized agents of the City; and, (4) ensured the former City Council Members were clear of outstanding debts.

The results of this audit found that the former City Council Members were clear of outstanding debts. However, the observations made in past special audits of former City Council Members continue to exist. See Attachment A that discusses similar observations made in this audit. We encourage the Mayor and City Council to continue development of procedures that address the risks associated with the observations.

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

If you have any questions, please contact me at 615-974-8700 or mark.swann@dallas.gov.

Special Audit of Former City Council Members February 28, 2025 Page 2 of 2

Sincerely,

Mark S. Swann

Mark S. Swann City Auditor

#### Attachment

C: Honorable Mayor and Members of the City Council
Kimberly Bizor Tolbert, City Manager
Tammy L. Palomino, City Attorney
Bart Bevers, Inspector General (I)
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Elizabeth Saab, Chief of Strategy, Engagement, and Alignment (I)
Jack Ireland, Chief Financial Officer
Sheri Kowalski, City Controller
Alpha T. Jalloh, Assistant Director – Financial Compliance, Auditing & Monitoring
Jeffrey Brill, Manager – Financial Compliance, Auditing, & Monitoring

#### OFFICE OF THE CITY AUDITOR – FINAL REPORT



# Special Audit of Former City Council Members

February 28, 2025

# Mark S. Swann, City Auditor

Mayor	Council Members	
Eric L. Johnson	Carolyn King Arnold	Jaime Resendez
Mayor Pro Tem	Paula Blackmon	Paul E. Ridley
Tennell Atkins	Zarin D. Gracey	Jaynie Schultz
Deputy Mayor Pro Tem	Cara Mendelsohn	Kathy Stewart
Adam Bazaldua	Jesse Moreno	Chad West
	Omar Narvaez	Gay Donnell Willis



# **Executive Summary**

# Objectives and Scope

This audit addressed the accounts of former City Council Members Casey Thomas II and B. Adam McGough. The scope of this audit is from July 1, 2021 through June 30, 2023, to determine whether the Mayor and City Council staff: (1) controlled and accounted for City personal property used by/for the former City Council Members; (2) ensured the former City Council Members officeholder account expenditures were for a public purpose; (3) ensured the former City Council Members were removed as authorized agents of the City; and, (4) ensured the former City Council Members were clear of outstanding debts.

#### Recommendations

We encourage the Mayor and City Council to continue development of procedures that address the risks associated with the observations.

## Background

The Office of the City Auditor is required by City Charter Chapter IX, Section 4, Special Audit, to audit the accounts of former City officials upon their death, resignation, removal, or expiration of term to determine any indebtedness to the City.

#### **Observed Conditions**

The results of this audit found that the former City Council Members were clear of outstanding debts. However, the observations made in past special audits of former City Council Members continue to exist. See Attachment A that discusses similar observations made in this audit. We encourage the Mayor and City Council to continue development of procedures that address the risks associated with the observations.

# **Attachment A:** Opportunities for Improvement

#### **Observation A:** City Personal Property Management

The Mayor and City Council staff does not track, monitor, or inventory personal property as required by Administrative Directive 6-01, Control of City Property (January 24, 2020). Most of the personal property acquired by council members is less than \$1,000 and includes items that might be considered unnecessary to conduct City business (furniture, decor, convenience accessories). Although, these purchases are within policy guidelines, not having complete, accurate and tagged trackable items make it difficult to verify the existence of the personal property, especially after the council member has left office.

The Mayor and City Council staff continues to use an MS Excel template as a tracking mechanism for council aides to document purchased equipment and furniture details under the \$5,000 capitalization threshold. However, the completeness and accuracy of the inventory are dependent on the diligence of the council aide in completing the form.

#### Criteria

- ❖ Administrative Directive 6-01, Control of City Property (January 24, 2020)
- ❖ Standards for Internal Control in the Federal Government, Principle 10 Design Control **Activities**

## **Observation B:** Annual Statement of City-Funded Officeholder Accounts

The Annual Statement of City-Funded Officeholder Accounts does not match financial system transactions, and documentation to support some of the expenditures selected for review was not provided. The ability to demonstrate City funds are being applied correctly is difficult when supporting documentation is not available, and reports of officeholder's expenditures cannot be easily traced to the City's financial records.

Exhibits 1 and 2 show the differences when comparing the expenditures listed on the annual reports to the City's financial records. For both former Council Members, both Exhibit 1 and Exhibit 2 indicate the transactions listed in their annual reports are generally underreported when compared to the actual expenses recorded in the City's financial records, and the lack of accuracy of the annual reports.

Exhibit 1:

Comparison of Annual Reports (15A) to City Financial Records – Casey Thomas II, District

#### Comparison of Annual Reports (15A) to the Budget-to-Actual Financial System, Casey Thomas II, District 3 **Fiscal Year Fiscal Year Fiscal Year Totals** 2021 2022 2023 \$20,612.09 \$21,604.06 15A Report \$12,435.76 \$54,651.91 **Actual Expense** 25,232.42 12,435.76 20,612.09 58,280,27 **Difference** \$0 \$0 \$(3,628.36) \$(3,628.36)

#### Comparison of Annual Reports (15A) to General Ledger Financial System, Casey Thomas II, District 3

Transactions FOUND in the <u>Expense General Ledger</u> Report but NOT in the <u>Annual Reports (15A)</u>			
Number of Transactions	Dollar Amounts		
34	\$12,935.62		
	Transactions FOUND in the <u>Annual Reports (15A)</u> Report but NOT in the <u>Expense General Ledger</u>		
Number of Transactions	Dollar Amounts		
59	\$16,563.98		

**Sources:** Annual Statement of City-Funded Officeholder Accounts, AMS Budget to Actual Report, and City Controller's Office

Exhibit 2: Comparison of Annual Reports (15A) to City Financial Records – B. Adam McGough, District 10

#### Comparison of Annual Reports (15A) to the Budget-to-Actual Financial System, B. Adam McGough, District 10

	Fiscal Year 2021	Fiscal Year 2022	Fiscal Year 2023	Totals
15A Report	\$11,850.96	\$25,665.05	\$11,071.82	\$48,587.83
Actual Expense	11,878.04	25,665.05	17,758.92	55,302.01
Difference	\$(27.08)	\$0	\$(6,687.10)	\$(6,714.18)

#### Comparison of Annual Reports (15A) to General Ledger Financial System, B. Adam McGough, District 10

Transactions FOUND in the Expense General Ledger Report but NOT in the <u>Annual Reports (15A)</u>

Number of Transactions	Dollar Amounts
22	\$6,780.75

#### Transactions FOUND in the Annual Reports (15A) Report but NOT in the **Expense General Ledger**

<b>Number of Transactions</b>	Dollar Amounts	
7	\$66.57	

Sources: Annual Statement of City-Funded Officeholder Accounts, AMS Budget to Actual Report, and City Controller's Office

#### Criteria

- City Code, Chapter 15 Elections Article 1-b City-Funded Officeholder Accounts Section 15A-7.4 Use of City-Funded Officeholder Accounts Section (b) and (d).
- ❖ Standards for Internal Control in the Federal Government, *Principle 10 Design Control* Activities

## **Observation C:** City Directives and Guidance

Administrative Directives related to physical access (ID badges, parking decals), logical access (use of City technology/internet), procurement and reimbursements, and records management do not address City officials. As a result, guidance, and accountability for separation from the City is lacking for City officials.

Council Member McGough did not return his parking decal and badge upon vacating office. The parking decal was returned on November 1, 2023, and the badge was never returned. Although Security Services disabled badge access as of June 20, 2023, the former Council Member still had free access to garages reserved for those with official City business until November 1, 2023.

In addition, City guidance such as the City of Dallas Enterprise Information Security Standard is outdated and does not reflect current practices. In the City of Dallas Enterprise Information Security Standard 9.51, Separation In Employment Procedure, the Department of Information & Technology Services is listed as responsible for employee separation tasks that are now largely automated by the City's workforce enterprise management system, Workday, which is primarily controlled by Human Resources. Roles for access and verification have changed and the correct procedure for attaining documentation and verification is not clearly defined.

The audit report, Special Audit of Former City Council Members – June 2021, issued July 21, 2022, discussed this issue and provided a table showing the Administrative Directives Related to Off-Boarding as of December 20, 2021. See Exhibit 3 for an updated table of Administrative Directives Related to Off-Boarding as of July 25, 2024.

#### Criteria<sup>1</sup>

- ❖ Administrative Directive 2-4, Interim Identification and Access Badge and Restricted Areas **Policy**
- ❖ Administrative Directive 6-10, *Dallas City Hall Parking Garage*
- ❖ Administrative Directive 2-24, *Computer Security*
- ❖ Information & Technology Services Enterprise Information Security Standard, Separation in Employment Procedure
- ❖ Standards for Internal Control in the Federal Government, *Principle 10 Design Control* **Activities**

<sup>&</sup>lt;sup>1</sup> Exhibit 3 lists broad "criteria" established by City Management that may require updates to procedures. The Criteria section applies to the specific examples cited above. Therefore, Criteria precedes the Exhibit.

#### Exhibit 3:

The table below outlines the administrative directives related to off-boarding for outgoing elected officials. The table was originally included in the audit report, Special Audit of Former City Council Members – June 2021, issued July 21, 2022, and has been updated as of July 25, 2024, with the addition of a column indicating the issuing department for each administrative directive. The table is provided to demonstrate the on-going need for complete and up-to-date procedures that address correct procedures to follow for off-boarding City officials and in some cases all City employees.

#### Administrative Directives related to Off-Boarding as of July 25, 2024

Administrative Directive	Issuing Department	Purpose	Scope	Applies to Elected Officials
2-4, Interim Identification and Access Badge and Restricted Areas Policy (June 28, 2018)	Equipment and Building Services*  *In 2018 this department was split into two departments: Building Services and Equipment and Fleet Management. As of October 1, 2023, this responsibility moved from Building Services to the Dallas Marshal's Office.	Provide instructions for departmental security controllers on the proper procedures for obtaining City of Dallas identification/badges and describes access security procedures for restricted areas	Departments, Employees	No
2-13, Gift and Trust Administration (October 2, 1995)	Budget & Management Services	Acceptance and proper investment and accounting of gifts and trusts	Departments, not the Employee Retirement Fund or the Dallas Police Pension Fund	No

Administrative Directive	Issuing Department	Purpose	Scope	Applies to Elected Officials
2-24, Computer Security (May 3, 2024)*  Previous version was updated as of June 30, 2017.	Information & Technology Services	Provide, manage, and govern the security of information systems and assets, including confidentiality, integrity availability, accountability, and assurance	Departments, all persons, computing devices that comprise the City's information technology systems and assets	No, if the device is not issued by Information & Technology Services
2-33, Acceptable Use of City Provided Email and Internet Services (July 31, 2001)	Communication & Information Services*  *Communication & Information Services is now referred to as Information & Technology Services	Define acceptable and unacceptable use of the internet to conduct business and help agencies with costeffective measures to disseminate information	All employees	No
2-51, Records Management (December 20, 2013)	City Secretary's Office	Describes Record management responsibilities, and compliance with Chapter 39C of the Dallas City Code	Departments, City Officers, Employees	No
3-56, <i>Payroll Procedures</i> (November 3, 2016)	Human Resources	Establish guidelines for payroll processing	Departments, Employees	No
4-05, Contracting Standards and Procedures (March 21, 2022) *Previous version was updated April 30, 2018	Office of Procurement Services/ City Attorney's Office	The directive sets out standards and procedures for contracting.	City Officers, Employees (City-Funded Officeholder Accounts must comply with the City's administrative directives regarding procurement)	Yes

Administrative Directive	Issuing Department	Purpose	Scope	Applies to Elected Officials
4-06, Reimbursement for Business Expenses (June 3, 1996)	City Controller's Office	Establish policies and procedures for city government employees, council members, and commission members who perform local and out-of-town official travel in the interest of the City of Dallas	Employees, Appointed and Elected Officials, Board Members	Yes
4-07, Travel Reimbursement Expenses (October 1, 2013)	City Controller's Office	Establish policies and procedures for city government employees, council members, and commission members who perform local and out-oftown official travel in the interest of the City of Dallas	Employees, Appointed and Elected Officials, Board Members	Yes
4-08 Mobile Telephone Services (June 12, 2004)	Business Development & Procurement Services*  *Business Development & Procurement Services is now referred to as Office of Procurement Services	Establish policy and procedures for the acquisition and use of City-owned mobile services and devices and City policy for cell phone allowance	Departments and Organizations	No
4-12 Employee in City Memberships (March 4, 2013)	City Controller's Office	Establish criteria for sponsorship, sponsor memberships, and procedures by which City- sponsored memberships will be paid	Employees, Elected Officials, Board Members	Yes

Administrative Directive	Issuing Department	Purpose	Scope	Applies to Elected Officials
4-15 Purchasing Card Policy and Procedures (September 7, 2022) *Previous version was updated October 31, 2018	Office of Procurement Services	Establish procedures for procuring goods using purchasing cards	Departments, Employees  (City-Funded Officeholder Accounts must comply with City's administrative directives regarding procurement)	Yes
6-01, Control of City Property (January 24, 2000)	City Controller's Office	Establish responsibilities and reporting policies for control of City-owned personal property	Departments	No
6-10, <i>Dallas City Hall</i> Parking Garage  (December 12, 2012)	Equipment and Building Services*  *In 2018 this department was split into two departments: Building Services and Equipment and Fleet Management. As of October 1, 2023, this responsibility moved from Building Services to the Dallas Marshal's Office.	Information and regulations regarding the use of the City Hall parking garage	Users of parking garage facilities at City Hall	No
City of Dallas Enterprise Information Security Standard (October 1, 2020)	Information & Technology Services	Section 15 guides the separation of employment procedures for handling users' access to all systems.	Departments, Commissions, Boards, Institutions or Agencies of the City, Devices on the City network.	No

Source: City of Dallas



# Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence

March 13, 2025

# Mark S. Swann, City Auditor

Mayor	Council Members	
Eric L. Johnson	Carolyn King Arnold	Jaime Resendez
Mayor Pro Tem	Paula Blackmon	Paul E. Ridley
Tennell Atkins	Zarin D. Gracey	Jaynie Schultz
Deputy Mayor Pro Tem	Cara Mendelsohn	Kathy Stewart
Adam Bazaldua	Jesse Moreno	Chad West
	Omar Narvaez	Gay Donnell Willis



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# **Executive Summary**

## Objective and Scope

The objective of this audit was to evaluate whether Dallas Police Department's efforts to protect victims of domestic violence are in line with best practices. The scope of the audit was from June 30, 2021, through June 30, 2023.

#### Recommendations

Management should:

Upload hand-written Domestic Violence forms into the Records Management System by the end of each watch and in the long term, incorporate the forms into the Field-Based Reporting interface and enable subsequent download of the forms into the Lethality Assessment Program database.

Train patrol officers on documentation procedures for domestic violence cases.

Improve the percentage of high-risk victims speaking with a shelter or counselor at the scene.

Train office assistants in entering data into the Lethality Assessment Program database.

Reconcile all Lethality Assessment Program Forms.

Implement performance measures and work instructions for caseworkers on how to identify and follow-up on high-risk victims, and how to document it.

Implement a standard operating procedure for the high-risk detective's referrals of domestic violence victims to The Family Place and documentation of the reasons for decisions not to refer.

## Background

In calendar year 2023, the City of Dallas recorded a total of 110,933 crimes. Domestic violence made up approximately 13 percent of the total number of crimes or 13,868. About 64 percent or 8,868 of these involved intimate partners. There were 15 intimate partner violence-related deaths in 2023.

The Dallas Police Department's Domestic Violence Unit is responsible for investigations of all domestic violence offenses.

#### **Observed Conditions**

Dallas Police Department's General Orders and Standard Operating Procedures for domestic violence cover most of the procedures described in the *Domestic Violence Model Policy* recommended by the International Association of Chiefs of Police.

Furthermore, Dallas Police Department exceeds the best practices for the identification and protection of victims of domestic violence. However, there are opportunities to improve the procedures related to the completion and retention of hand-written forms related to domestic violence, services provided by the Domestic Violence Unit caseworkers, and analyses performed by the high-risk detective.

# **Objectives and Conclusions**

1. Are Dallas Police Department's General Orders and Standard Operating Procedures in line with the Domestic Violence Model Policy recommended by the International Association of Chiefs of Police as it relates to protecting victims of domestic violence?

**Yes.** Dallas Police Department's General Orders and Standard Operating Procedures for domestic violence cover most of the procedures described in the Domestic Violence Model Policy recommended by the International Association of Chiefs of Police. Furthermore, the Dallas Police Department's procedures include additional practices to identify and protect victims who are at high risk of being re-assaulted or killed, such as:

- The use of a *Lethality Assessment Program Form* to identify high-risk victims at the scene of the crime and to immediately connect them with a shelter and a counselor.
- The employment of two caseworkers with Dallas Police Department's Domestic Violence Unit to follow-up on high-risk victims and to offer services and counseling.
- The crime analysis performed by a dedicated high-risk detective to identify high-risk victims who should be granted priority for shelter placement and protection.

However, there are opportunities to improve the procedures related to the completion and retention of the hand-written forms related to domestic violence, services provided by the Domestic Violence Unit caseworkers, and analysis performed by the high-risk detective. (See Observation A and Observation B.)

2. Did Dallas Police Department accurately identify crimes that involve domestic violence victims who are at high risk of being re-assaulted or killed?

**Yes.** The Dallas Police Department accurately classified domestic violence cases during the audit period of June 30, 2021, through June 30, 2023. A review of a random sample of 60 out of 21,830 non-domestic violence assault cases showed that the cases were properly classified as non-domestic violence cases. Further, a review of a random sample of four out of 10 disorderly conduct domestic violence cases that occurred during the audit period showed that the cases did not belong to a more serious crime classification, such as aggravated assault.

## **Audit Results**

Both *City Council Resolution 88-3428* and Administrative Directive 4-09, *Internal Control* prescribe policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

#### **Observation A:** Completion and Retention of Required Forms

Identification of high-risk victims of domestic violence begins with the responding patrol officers' incident report of the crime. The Dallas Police Department General Order 307.00 "Family Violence Prevention," Sections 307.01 D.8 and D.9, direct responding officers to not only fill out an electronic incident report but also to fill out a hand-written Domestic Violence Supplement Packet that consists of two forms stapled together: a Domestic Violence Supplemental Form for all domestic violence cases, and a Lethality Assessment Program Form if intimate partners are involved. See Appendix B for the actual forms.

The Domestic Violence Unit submits both the *Domestic Violence Supplemental Form* and the *Lethality Assessment Program Form* to the Dallas County District Attorney's Office as evidence for prosecutions.

#### Exhibit 1:

#### **Domestic Violence Supplemental Packet Contents**

**Form** 

# Information about the Contents / Included Documentation

# Domestic Violence Supplemental Form

Required to be completed for all domestic violence victims

The form contains the following information:

- The victim and the suspect information as well as their relationship.
- The offence details of the case such as the victim's photos and whether the victim was strangled.
- A written statement by the victim or a witness (affidavit).
- Resources for the victims such as their legal rights and the numbers to the emergency shelters or social organizations for victim protection.

#### **Form**

# Information about the Contents / Included Documentation

# Lethality Assessment Program Form

Required to be initiated for all intimate partner violence victims

The form asks 11 questions to immediately identify victims who are at the greatest risk of serious injuries or death.

Once responding patrol officers identify a victim as highrisk, they call The Family Place or Genesis Women's Shelter and have these local advocates speak to the victim to offer them immediate placement to a shelter or advice. Victim participation is voluntary, and the victims can refuse to answer the questionnaire or to speak to the shelters.

**Source:** Dallas Police Department

#### **Routing and Retention of Forms**

When there is no arrest on the scene, patrol officers return the Domestic Violence Supplement Packets (both the *Domestic Violence Supplemental Forms* and the *Lethality Assessment Program Form*) to the patrol station. Officers turn the packets into the tray at the front desk. The packets are then couriered to the Domestic Violence Unit for their investigations. The information in the packets is important for the Domestic Violence Unit detectives to receive timely to determine if a victim is at great risk to be re-offended or killed by the suspect. Therefore, the patrol station is required to email the packets to the Domestic Violence Unit without delay. The patrol station sergeant for each watch<sup>1</sup> is responsible for ensuring this is accomplished by the end of each watch.

#### **Missing Forms**

Dallas Police Department General Order 307.00 "Family Violence Prevention," Section 307.01 directs patrol officers to complete a Domestic Violence Supplemental Form when responding to all domestic violence assaultive offenses and to complete a Lethality Assessment Program Form on all intimate partner offenses. Dallas Police Department Roll Call Training Bulleting 2012-49 requires patrol officers to document a summary of the outcome of the Lethality Assessment

First Watch: 9:00 pm-7:00 am, Second Watch: 6:00 am-4:00 pm, and Third Watch: 9:00 pm - 7:00 am

First Watch: 12:00 am - 8:00 am, Second Watch; 7:00 am - 3:00 pm, Third Watch: 2:00 pm - 10:00 pm, and Fourth Watch: 8:00 pm - 4:00 am

<sup>\*</sup>The Dallas Police Department implemented the Domestic Violence Lethality Assessment Program on October 1, 2012, by partnering with local advocates: The Family Place and Genesis Women's Shelter. The program was designed by Dr. Jacquelyn Campbell of Johns Hopkins University in 2005.

<sup>&</sup>lt;sup>1</sup>Dallas Police Department patrol station operates 24/7 under a shift schedule called "watch". Generally, each station follows one of the two watch schedules described below, depending on whether they are on an 8-hour shift or a 10-hour shift.

*Program Form* in the incident report. For example, a summary may say that the *Lethality* Assessment Program Form was initiated but could not be completed as the victim refused to cooperate.

A review of a random sample of 50 incident reports out of 30,513 domestic violence cases recorded during the audit period from June 30, 2021, through June 30, 2023, showed that:

Five out of 50 (or 10 percent) domestic violence cases did not have a completed *Domestic Violence* Supplemental Form.

Out of these 50 domestic violence cases, 36 cases (or 72 percent) involved intimate partner violence and, therefore, required a completed Lethality Assessment Program Form if the victim cooperated. Ten out of 36 (or 28 percent) intimate partner domestic violence cases did not have a completed Lethality Assessment Program Form.

Of the 10 *Lethality Assessment Program Forms* that were not completed:

- Two forms were not available because the victims were injured and unable to respond to questions.
- Four forms were not available because the victims refused to answer the form's questions.
- One form could not be located.
- Three forms have no documentation in the incident report although the officers are required to document a short summary of the Lethality Assessment Program outcome for all intimate partner violence cases in the incident report (Roll Call Training Bulletin 2012-49 which is referenced in Dallas Police Department General Order 307.00 "Family Violence Prevention," Section 307.01 D.9a.).

As a result: (1) some Domestic Violence Supplemental Forms and the Lethality Assessment Program Forms are not available for use by the Domestic Violence Unit detectives and the Dallas County District Attorney's Office prosecutors; and (2) high-risk victims may not be offered to be connected to the shelters at the scene.

According to the Dallas Police Department Standard Operating Procedures, the Domestic Violence Packets are required to be entered into Records Management System by jail staff when there is an arrest, or emailed to the Domestic Violence Unit by patrol station staff when there is no arrest, by the end of each watch. However, in practice, the patrol station staff does not email the forms for non-arrest cases. Instead, they send them in by interdepartmental mail, which causes a delay or loss of the packets.

Patrol sergeants have stated that the Dallas Police Department lacks continuous training on domestic violence cases for officers. As a result, the officers may not fully understand the importance of completing the packets and may not do their best to complete them.

#### **Effectiveness of the Lethality Assessment Program Form**

According to the Dallas Police Department, the percentage of victims who were identified as high risk per the Lethality Assessment Program Form and immediately spoke with a shelter/counselor at the scene was around 20 percent during the audit period. This is a decline since the initiative started in 2012 when the percentage was over 40 percent. While it is ultimately up to the victim to speak with the shelter or counselor, the Dallas Police Department may consider researching what has caused a decline in this connection percentage.

#### Criteria

The Dallas Police Department General Order 307.00 "Family Violence Prevention:"

Section 307.01, D. 8.

Section 307.01, D. 9.

- ❖ The Dallas Police Department Training Bulletin 2019-02
- ❖ The Dallas Police Department Training Bulletin 2012-49
- The United States Department of Justice "Improving Law Enforcement Response to Sexual Assault and Domestic Violence by Identifying and Preventing Gender Bias" - Principle 3: Ensure that Policies, Training, Supervision, and Resource Allocation Support Thorough and Effective *Investigations*
- The International Association of Chiefs of Police Intimate Partner Violence Response Policy and Training Content Guidelines – *Training and Personnel*
- The United States Department of Justice "Improving Law Enforcement Response to Sexual Assault and Domestic Violence by Identifying and Preventing Gender Bias" - Principle 5: Refer Victims to Appropriate Services.

Assessed Risk Rating:

#### Moderate

#### We recommend the **Dallas Police Chief:**

**A.1:** In the long term, incorporate the currently hand-written *Domestic Violence* Supplemental Form and Lethality Assessment Program Form into the Field-Based Reporting interface to enable patrol officers to immediately electronically transmit the form data to the Records Management System.

**A.2:** In the short term, ensure that both jail staff and patrol station staff upload the *Domestic* Violence Supplement Packet into the Records Management System by the end of each watch.

A.3: Implement continuous training for patrol officers on documentation procedures for domestic violence cases, including documentation of the reasons behind incomplete Lethality Assessment Program Forms.

**A4:** Improve the percentage of high-risk victims speaking with a shelter or counselor at the scene.

# **Observation B:** Identification and Protection of High-Risk Victims of Domestic Violence

Identification of high-risk victims continues when the Domestic Violence Unit's caseworkers provide counseling, information, and support to victims through follow-up safety calls and inoffice counseling. In addition, the Dallas Police Department Domestic Violence Unit assigns a high-risk detective as a coordinator between the Dallas Police Department and the Domestic High Risk Offender Team.<sup>2</sup> The detective performs a daily review of all new intimate partner violence cases to identify high-risk victims and refer them to The Family Place for intake or follow-up.

While the Dallas Police Department exceeds the practices described in the *Domestic Violence Model Policy* recommended by the International Association of Chiefs of Police to identify and protect victims of domestic violence, there are opportunities to improve these procedures.

#### **High-Risk Victim Follow-Up and Data Retention**

Dallas Police Department Domestic Violence Unit employs two full-time caseworkers. Once caseworkers receive physical copies of the *Lethality Assessment Program Forms* from patrol or jail staff via interdepartmental mail, the caseworkers manually input the information from the forms into the Lethality Assessment Program Database. The database is a separate system from the Dallas Police Department's primary Records Management System. The caseworkers then retain the forms of high-risk victims and shred the low-risk victim forms. The caseworkers use this Lethality Assessment Program database, along with a separate excel spreadsheet, to keep track of follow-up activities with the high-risk victims. The caseworkers perform follow-up calls on high-risk victims to check in on their safety, offer counselling over the phone or in person, and provide resources such as contact information of the shelters. Once the follow-up is performed, this activity is logged into a separate spreadsheet. The Lethality Assessment Program database is also utilized by the Dallas Police Department to produce their Lethality Assessment Program statistics presented to the Public Safety Committee annually.

Audit testing of the database records shows that the database is incomplete and not always accurate. In particular:

- A review of 26 *Lethality Assessment Program Forms* filled out at the scene of the crime showed that 9 out of 26 (or 35 percent) were not entered into the Lethality Assessment Program database.
- 1,179 of 10,511 victims (or 11 percent) were potentially miscategorized as low-risk rather than high-risk victims because there is a misunderstanding about the correct definition of a high-risk victim based on the *Lethality Assessment Program Form*.

<sup>&</sup>lt;sup>2</sup> Domestic Violence High Risk Offender Team is a collaboration led by The Family Place (a victims advocate and shelter), which includes the Dallas Police Department, Dallas County District Attorney's Office, Dallas County Community Supervision and Corrections Department (CSCD), and Genesis Women's Shelter, that seeks to identify and intervene in high risk intimate partner domestic violence cases, reduce ongoing harm to victims, reduce recidivism with perpetrators, increase offender accountability, and ultimately prevent homicides.

As a result, the Domestic Violence Unit is not following up with all high-risk victims and does not have accurate data for the Lethality Assessment Program statistical reports.

Currently, there is no reconciliation between all Lethality Assessment Program Forms that are completed by the Patrol Unit in the field and the Lethality Assessment Program Forms that are entered into the Lethality Assessment Program database. In addition, there are no clear performance measures for the caseworkers regarding follow-up with the victims. During the audit period, the caseworkers were spending time fulfilling the office assistants' job duties instead of providing counseling services to the victims as the office assistant positions were vacant.

In the Unit's Standard Operating Procedures, the process of entering the Lethality Assessment Program information into the Lethality Assessment Program database is described as the office assistants' responsibility. In practice, this is the caseworkers' responsibility. Caseworkers do not have written work instructions that describe how to identify and follow-up on high-risk victims and how to document the identification and follow-up process.

#### **High-Risk Detective's Referrals**

The Domestic Violence Unit assigns a high-risk detective as a coordinator between the Dallas Police Department and the Domestic High Risk Offender Team. The high-risk detective uses criteria developed by the Dallas Police Department Domestic Violence Unit, The Family Place, and the Dallas County District Attorney's Office to identify victims in danger of re-assault or death. However, the documents related to the high-risk cases during the audit period of June 30, 2021, through June 30, 2023, do not include explanations as to why some high-risk victims who should have been referred to The Family Place were not referred.

For example, from a sample of 20 cases, four (or 20 percent) met the criteria for high-risk victim referral but were not referred to The Family Place. There is no documented explanation on whether the cases were reviewed by a high-risk detective, and why a referral decision was not made. The criteria for referral from the Dallas Police Department to The Family Place are not described in the Dallas Police Department's General Orders or Standard Operating Procedures, and there is a reliance on the high-risk detective's professional judgement for the referral decision.

#### Criteria

The International Association of Chiefs of Police Intimate Partner Violence Response Policy and Training Content Guidelines – Post-Incident Investigation and Follow-Up

The International Association of Chiefs of Police Intimate Partner Violence Response Policy and Training Content Guidelines - Training and Personnel, Victim Safety and Protection

The United States Department of Justice "Improving Law Enforcement Response to Sexual Assault and Domestic Violence by Identifying and Preventing Gender Bias" - Principle 5: Refer Victims to Appropriate Services.

Assessed Risk Rating:

**Moderate** 

#### We recommend the **Dallas Police Chief:**

- **B.1:** In the long term, implement a procedure for electronically downloading *Lethality* Assessment Program Form answers from the Records Management System into the Lethality Assessment Program database and automatically identifying high-risk victims based on the downloaded answers.
- **B.2:** In the short term, fill the vacant office assistant positions and train the office assistants in entering data from the hand-written *Lethality Assessment Program Form* into the Lethality Assessment Program database.
- **B.3:** Develop and implement a standard operating procedure for the reconciliation between all Lethality Assessment Program Forms that are completed by the Patrol Unit in the field and the Lethality Assessment Program Forms that are entered into the Lethality Assessment Program database.
- **B.4:** Develop and implement clear performance measures, job expectations, procedures, and work instructions for caseworkers on how to identify and follow-up on high-risk victims, and how to document the identification and follow-up process.
- **B.5:** Develop and implement a standard operating procedure for the high-risk detective's referrals of domestic violence victims to The Family Place and documentation of the reasons for decisions not to refer.

# **Appendix A:** Background and Methodology

# Background

#### **Domestic Violence Definition**

Domestic violence is a pattern of abusive behavior in any relationship that is used by one partner to gain or maintain control over another partner. It includes physical, sexual, psychological, and emotional abuse, as well as threats of violence or economic control. The Texas Family Code sections 71.004 and 71.0021 deal with crimes of domestic violence.

There were 30,513 domestic violence cases recorded by the Dallas Police Department during the audit period of June 30, 2021, through June 30, 2023. See Exhibit 4 for the City's crime statistics related to all crimes, domestic (family) violence, and intimate partner violence crimes during the recent years.

Dallas' Domestic Violence and Human Trafficking Advisory Council The Advisory Council's role is to facilitate collaboration and communication between the community partners and support their current needs. The Council cooperates with law enforcement and the judicial system identifying potential lethality in domestic violence situations and works to prevent lethality from occurring. Increasing public awareness of the crimes and striving to bring the community together to end family violence is central to its mission. Domestic Violence affects individuals in every community, regardless of age, economic status, sexual orientation, gender, race, religion, or nationality.

There is a need to address the root causes of violence and abuse and to change social norms that perpetuate domestic violence using the following strategies for action (see Exhibit 2 on the next page):

#### Exhibit 2:

### Strategies for Action

#### Prevention Support, Healing, Safety, and Well-being Prevention includes research and data collection about **Economic Security and Housing Stability** the nature and scope of This stage includes a domestic violence response to trauma and victimization and Legal and Justice System providing the survivors with This stage includes efforts to perpetration in general, and help to enable a healing improve economic security, in marginalized and process. It requires asset-building opportunities, These efforts include ensuring underserved communities. improvements and and financial protection to that the justice system is In addition, it requires interagency coordination in mitigate domestic violence, responsive to survivors' needs efforts to increase public providing quality traumahelp survivors escape abuse, awareness about the causes and experiences and protects informed, survivor-centered and support long-term of domestic violence, its victims throughout the programs and support. It financial independence criminal justice process. social impacts, and the need also requires providers to through access to good jobs for early intervention, address disparities and and safe, affordable, and enhanced education to inequities in access to long-term housing. promote healthy and trauma care for domestic respectful relationships and violence survivors from break cycles of violence. marginalized and underserved communities.

Source: U.S. National Plan to End Gender-Based Violence

In Dallas, the community partners responding to domestic violence and helping the victims are described on the next page in Exhibit 3.

#### Exhibit 3:

### **Community Partners**

### **The Family Place**

(24-Hour Hotline 214-941-1991, The Family Place Website)

• The Family Place runs a 24-hour hotline for victims of abusive relationships, and provides an emergency shelter, crisis counseling for children, medical and dental care, early childhood education, transitional housing, job, technical and life skills training for adults, counseling, and an animal shelter.

#### **Genesis Women's Shelter**

(24-Hour Hotline- 214-946-4357, Genesis website PDF)

• The Genesis Women's Shelter provides an emergency shelter, transitional housing, counseling services for women, teens, and children, and legal services.

### **Dallas County District Attorney's Office**

• The Dallas County District Attorney's family violence Division is a team of prosecutors, investigators, advocates, legal secretaries, and support staff dedicated to the prosecution of Family Violence cases.

### **Dallas Police Department**

• The Patrol Bureau responds to domestic violence calls for service. The Domestic Violence Unit investigates the crimes and identifies and protects high-risk victims.

### **Dallas Independent School District**

•The district works with The Family Place on domestic violence education. Educators from The Family Place join the students at Dallas Independent School District in their health classes to teach them about healthy relationships.

Source: Community partner websites

### Domestic Violence Dashboard

The City of Dallas implemented an interactive Domestic Violence dashboard in 2022. The primary objectives of the dashboard are to increase public awareness about domestic violence, to display data from the Dallas County District Attorney's Office and local domestic violence shelters, and to measure domestic violence crime trends over time.

See Exhibit 4 and Exhibit 5 for the City of Dallas Crime Statistics trend and the dashboard data from 2023, respectively.

### Exhibit 4:

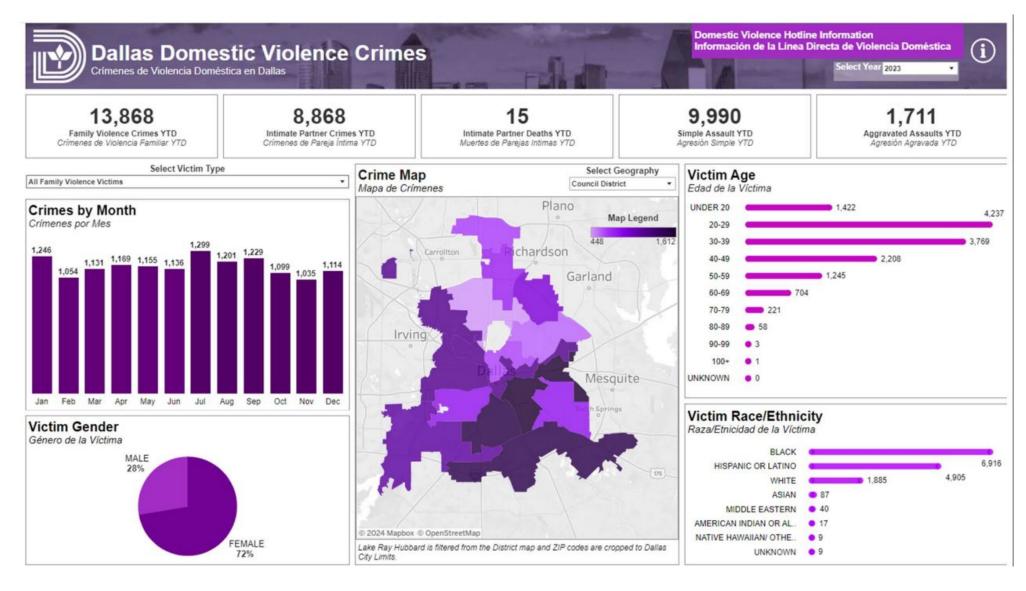
# City of Dallas Crime Statistics

Calendar Year	<b>Total Crimes</b>	Family Violence Crimes	Intimate Partners Crimes	Intimate Partner Deaths
2021	108,246	15,985	11,000	17
2022	108,814	15,270	10,013	14
2023	110,933	13,868	8,868	15
YTD as of 9/6/2024	69,069	9,443	6,116	8

**Source:** Dallas Crime Analytics Overview Dashboard and Dallas Domestic Violence Crimes Dashboard.

Link - Dallas Domestic Violence Crimes Dashboard

Exhibit 5:



### Dallas Police Department Domestic Violence Unit

The Domestic Violence Unit is a specialized investigative office created to respond to domestic violence in the City of Dallas. The Domestic Violence Unit is responsible for follow-up investigations of all domestic violence offenses.

The Domestic Violence Unit is commanded by a Lieutenant of Police who reports to the Major of Police of the Special Victims Division. The unit is comprised of uniformed officers, civilian staff, and civilian counselors. The Domestic Violence Unit consists of 51 personnel.

The number of personnel may fluctuate by year depending on the budget and vacancies.

Please see Exhibit 6 below.

### **Exhibit 6:**

### Domestic Violence Unit Personnel Makeup

Sworn Personnel	Authorized
Major	1
Lieutenant	1
Sergeants	5
Senior Corporals/Detectives	38
Police Officers	1
Total:	46

Non-Sworn Personnel	Authorized
Caseworkers	2
Investigative Support Specialist	1
Senior Office Assistant	1
Office Assistant	1
Total:	5

Source: Dallas Police Department Domestic Violence Unit Standard Operating Procedures

# Methodology

The audit methodology included:

Interviewing personnel from the Dallas Police Department, The Family Place, Genesis Women's Shelter, the Dallas County District Attorney's Office, and the City of Dallas Domestic Violence and Human Trafficking Advisory Council.

Reviewing General Orders, Standard Operating Procedures, Training Bulletins, the *Texas Family Code §* 71.004 and § 71.002, *Texas Penal Code*, and best practices such as the International Association of Chiefs of Police Domestic Violence Model Policy.

Performing various analyses.

In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

## Major Contributors to the Report

Shino Knowles, CPA – In-Charge Auditor Anatoli Douditski, MPA, CIA, CFE, ACDA – Engagement Manager

# **Appendix B:** Domestic Violence Supplement Packet

		O	Offense Date:	
		VICTIM:		
Name:	DOB:	Height:	Weight:	_
Phone Number: Other Phone	one Number:		Email:	
Emergency Contact for Victim:				
Name:	Address	:		<u></u>
Phone Number:Email:				
Victim injured? ☐No ☐Yes Pain scale (0-10):	Descri	be injuries:		
Transported to Hospital? ☐No ☐Yes Hospital Nan	ne:		EMT	Jnit#:
Victim pregnant? □No □Yes#of weeks? Su	uspect aware of	pregnancy? □No □	Yes Is the child his?	No □Yes
Hospitaly Omno-Doctor Name.		SUSPECT:	Number:	
Name:	R/S:	DOR.	Heinht.	Weight:
Address:				
Email:				
Suspect injured? No Yes Describe injuries:				
Transported to Hospital?   No Yes Hospital Na				Unit #:
Suspect arrested?   No Yes Suspect owns/has a				
		RELATIONSHIP:		
Victim/Suspect Relationship:		Length	n of Relationship:	
Recent separation/threat of separation?	es			
	OFFE	NSE INFORMATIO	N:	
	OFFE	NSE INFORMATIO	<u>N:</u>	
Strangulation? No Yes (Complete attached Documer				
IPV (Intimate Partner Violence)? □No □Yes (Comp	ntation Form for Att	empted Strangulation Case	is)	
IPV (Intimate Partner Violence)? □No □Yes (Comp	ntation Form for Att	empted Strangulation Case	is)	]
IPV (Intimate Partner Violence)? ☐No ☐Yes (Compi Weapon: ☐No ☐Yes Type:Ta	ntation Form for Att	empted Strangulation Case lity Screen for First ResponEvidence? [	ls) iders) □ Protective Custody? □	
IPV (Intimate Partner Violence)? ☐ No ☐ Yes (Compl Weapon: ☐ No ☐ Yes Type:Ta Affidavit(s) attached? ☐ No ☐ Yes by Victim? ☐ b	ntation Form for Atti- lete attached Letha ag #: by Witness?	empted Strangulation Case lity Screen for First Respon Evidence? [ Witness Name:	us) Iders) □ Protective Custody? □	
IPV (Intimate Partner Violence)? □No □Yes (Compl Weapon: □No □Yes Type:Ta Affidavit(s) attached? □No □Yes by Victim? □ t Children present? □No □Yes Name/Age:	ntation Form for Attu- lete attached Letha ag #: by Witness? □	empted Strangulation Case  lity Screen for First Respon _Evidence? [  Witness Name:Name]	s) iders) □ Protective Custody? □ ame/Age:	
IPV (Intimate Partner Violence)?	ntation Form for Att. lete attached Letha ag #: by Witness?   No  Yes CF	empted Strangulation Case  lity Screen for First ResponEvidence? [ Witness Name:NaName  Name	s)  □ Protective Custody? □  ame/Age: □  □ Yes <b>Refer to CPS?</b> □	No □Yes
Strangulation? No Yes (Complete attached Documer IPV (Intimate Partner Violence)? No Yes (Complete attached Documer IPV (Intimate Partner Violence)? No Yes (Complete Attached Power Interpretation of the Interpretation of	ntation Form for Attilete attached Letha ag #: by Witness?   No  Yes CFPhotos of	empted Strangulation Case lity Screen for First ResponEvidence? [ Witness Name:NaNa _PS notified? \( \subseteq \s	ame/Age:  Yes Refer to CPS?	No □Yes suspect if not at location.)
IPV (Intimate Partner Violence)? No Yes (Complete Weapon: No Yes Type:Ta Affidavit(s) attached? No Yes by Victim? to Children present? No Yes Name/Age:EPO applied for? No Yes Taken to shelter? Photos taken by: PES BWC Badge #:	iete attached Letha ag #: by Witness? ☐ ☐No ☐Yes CF Photos of	empted Strangulation Case lity Screen for First ResponEvidence? [ Witness Name:NaNa _PS notified? \( \subseteq \s	ame/Age:  Yes Refer to CPS?	No □Yes suspect if not at location.)
IPV (Intimate Partner Violence)?	ntation Form for Attilete attached Letha ag #: by Witness?   No	empted Strangulation Case lity Screen for First ResponEvidence? [ Witness Name:NaNaNaNaNaNaNaNaNa	ame/Age:  Yes Refer to CPS?   (*use pictures of the SC Car Video Vehicle #:	No □Yes suspect if not at location.)
IPV (Intimate Partner Violence)?	ntation Form for Attilete attached Letha ag #: by Witness?   No	empted Strangulation Case lity Screen for First ResponEvidence? [ Witness Name:NaNaNaNaNaNaNaNaNa	ame/Age:  Yes Refer to CPS?   (*use pictures of the SC Car Video Vehicle #:	No □Yes suspect if not at location.)
IPV (Intimate Partner Violence)?	intation Form for Attilete attached Letha ag #:	empted Strangulation Case  lity Screen for First Respon Evidence? [  Witness Name:	ame/Age:  Yes Refer to CPS?   (*use pictures of the SC Car Video Vehicle #:	No □Yes suspect if not at location.)

Updated August 2023



	Case Number:Officer Name:
ı	What was used to apply pressure? (How were you strangled? Check all that apply)
	☐ One hand ☐ Both hands ☐ Forearm ☐ Knee/foot ☐ Other/Object (Describe):
	How were your bodies when pressure was applied? (i.e.: from behind, face to face):
	Estimate level of pressure (check one): 0 1 2 3 4 5 6 7 8 9 10 (0=none, 10=extremely strong)
	How long did it seem to last?: During this assault, were there multiple s/s incidents? Yes # No
	Was pressure applied to the neck consistently or did it change? (Describe):
	What, if anything, did you do to (physically) attempt to stop the strangulation?
	Were you shaken or your head hit against a surface or an object? (Describe):
	At any point was any pressure placed on your chest/torso? (Describe):
	Has the suspect ever: Held your face in water/liquid? Poured water/liquid over your face? If yes, describe:
	What, if anything, did the suspect say during the s/s?
	Describe suspect's face/demeanor/expression during s/s:
٧	What were you thinking during s/s?
	What caused the suspect to stop? Were children present? ☐ Yes ☐ No
	Has suspect s/s you before? ☐ No ☐ Yes # of times When/Where? Reported? ☐ No ☐ Yes Agency?
	Describe your breathing during the s/s (if not, describe):
	Tell me about your breathing after the s/s:
	How did your throat feel during the s/s:after the s/s:
	Did you cough?: ☐ during ☐ after ☐ never (describe):
	Describe any changes to your voice (i.e.: painful/raspy/hoarse/whispening):
	Describe any changes to your swallowing (i.e.: painful/difficult/saliva changes):
	How did your body feel d/a s/s?
	How did your head feel d/a s/s? Headache? □ During □ After □ None
	Any change or loss of vision d/a s/s?   No   Yes (describe)
	Any change or loss of hearing d/a s/s? ☐ No ☐ Yes (describe)
	How did your ears feel d/a s/s?
	Are there any gaps in your memory?   Yes   No Loss of consciousness?   Yes   No   Not Sure (describe)
	Did you Urinate Defecate or Peel the urge to do one or both during or immediately after the s/s (if so, collect and photograph clothing)
	Did you vomit/dry heave/feel nauseous d/a s/s? ☐ No ☐ Yes (describe)
	Did you feel faint/dizzy/lightheaded da/ s/s? ☐ No ☐ Yes (describe)
	Please describe any other symptoms/behavior observed by the officer:

		PLEASE TAI	KE PHOTOGRAPHS	
jewelry relev	Was either party wearing jewelry relevant to injuries? (i.e.: rings, earrings, necklaces) No Yes			ographs taken? No Yes
NEC	NECK/CHEST FACE		EYES & EYELIDS	EARS
Bruis Ligat Scrat	er or painful ing ure marks	Red or flushed Petechiae Scratches/abrasions Bruising Lips or mouth Under chin	Petechiae in R/L eyeball Petechiae in R/L eyebild Redness in eyes Redness in eyelids	Petechiae on ear(s)  Bruising/discoloration behind ear(s)  Bleeding from ear(s)  Injury behind ear(s)
			ALL AREAS THAT WERE REPORTED E	Υ
(A)			Right	eft S
5	To A	20	MAM	Top Bottom
	additional external mark			
Photogra If strang Collect a	aph injuries, parties, scer led/suffocated with objec	t: photograph object where found soiled/torn clothing, surveilland ources/referrals	d and collect for evidence	
		***RESERVED	FOR FUTURE USE***	



### DOMESTIC VIOLENCE LETHALITY SCREEN FOR FIRST RESPONDERS







(214) 941-1991 (214) 946-4357 (HELP)

Officer:	Date:	Case #	:	
Victim:	Offender:			
☐ Check here if victim did not answer any	of the questions.			
► A "Yes" response to any of Questions #I	-3 automatically triggers the prote	cal rafare	al	
Has he/she ever used a weapon against y			□No	□Not Ans.
Has he/she threatened to kill you or your		□Yes	□No	□Not Ans.
		□ i es	□INO	□ Not Ans.
<ol><li>Do you think he/she might try to kill you</li></ol>	?	□Yes	□No	□ Not Ans.
Negative responses to Questions #1-3, bu trigger the protocol referral.	t positive responses to at least four	of Quest	ions #4-	-11,
4. Does he/she have a gun or can he/she get	t one easily?	□Yes	□No	□Not Ans.
5. Has he/she ever tried to choke you?		□Yes	□No	□Not Ans.
6. Is he/she violently or constantly jealous of your daily activities?	or does he/she control most	□Yes	□No	□ Not Ans.
7. Have you left him/her or separated after	living together or being married?	□Yes	□No	□Not Ans.
8. Is he/she unemployed?		□Yes	□No	□Not Ans.
9. Has he/she ever tried to kill himself/hers	elf?	□Yes	□No	□Not Ans.
10. Do you have a child that he/she knows is	not his/hers?	□Yes	□No	□Not Ans.
11. Does he/she follow or spy on you or leave	re threatening messages?	□Yes	□No	□Not Ans.
► An officer may trigger the protocol referral, response to the below question, or whenever				ation.
Is there anything else that worries you about	your safety? (If "yes") What worri	es you?		
What is the victim's gender?		□Male	□ Fer	male
What is the suspect's gender?		□Male	☐ Fer	nale
Was the Victim Transported to a Hospital?		□Yes	□No	
Was the suspect intoxicated/high during this	offense?	□Yes	□No	
Is the suspect At Large?		□Yes	□No	
Check one: Uictim screened in accordi	-			
If victim screened in: After advising her/l did the victim speak	him of a high danger assessment, with the hotline counselor?	Yes	s□ No	

Note: The questions above and the criteria for determining the level of risk a person faces is based on the best available research on factors associated with lethal violence by a current or former intimate partner. However, each situation may present unique factors that influence risk for lethal violence that are not captured by this screen. Although most victims who screen "positive" or "high danger" would not be expected to be killed, these victims face much higher risk than that of other victims of intimate partner violence.

Name	DOB	Home Phone
Home Address	City	/State/Zip
Please print or write legibly.)		ate and location and construct the facts in chronological order untruthful statement given knowingly will subject you to
	-	
STATE OF TEXAS COUNTY OF DALLAS		
		said County, State of Texas, this day personally appeared noath declares that the statements made herein are true and
		Signature of Affiant
Subscribed and sworn to before me this	day of	, 20



# Dallas County Criminal District Attorney's Office



The District Attorney's Office is responsible for seeking justice on behalf of the people of Dallas County. Part of seeking justice includes being conveniently accessible to the community while providing services to victims, witnesses and those affected by violence.

The mission of the Community Resource Satellite Offices is to provide assistance to victims of domestic violence in a safe and convenient location, should they be unable to seek services at the main office in downtown Dallas.

The District Attorney's Office and its staff are here to serve YOU!

### **COMMUNITY SATELLITE OFFICES**

(Pre-Screening available for Protective Orders)

Northeast Division, Dallas Police Department 9915 E. N.W. Highway Dallas, Texas 75238 Tues/Thurs: 2-4:30pm

Cedar Hill Police Department 285 Upton Blvd. Cedar Hill, Texas 75104 Thurs: 2-4:30pm

Southwest Division, Dallas Police Department 4320 West Illinois, Ave. Dallas, TX Tues: 2-4:30pm

Grand Prairie Police Department 1525 Arkansas Lane Grand Prairie, TX 75052 Tues/Thurs: 2-4:30pm South Central Division, Dallas Police Department 1999 East Camp Wisdom Road Dallas, Texas 75241 Thurs: 2-4:30pm

Irving Police Family Advocacy Center 600 W. Pioneer Drive Irving, Texas 75061 Tues/Thurs: 2-4:30pm

Road & Bridge Office, District 1 715 Rowlett Road, Garland, Texas 75043 Wed. 2-4:30pm

Richardson Counseling Ctr. Address provided with appt. 469-283-0242

### **COMMUNITY COURTS**

(Pre-Screening available for Protective Orders)

South Oak Cliff Community Court 2111 South Corinth Street Rd. Dallas, Texas 75203 Mon: 9-5pm

West Dallas Community Court 2828 Fishtrap Rd. Dallas, Texas 75212 Tues: 9-5pm South Dallas Community Court 2922 Martin Luther King Jr. Blvd. Dallas, Texas 75215 Thurs: 9-5pm

# **Appendix C:** Management's Response

### Memorandum



**DATE:** March 14, 2025

то: Mark S. Swann – City Auditor

SUBJECT: Response to Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence

This letter acknowledges the City Manager's Office received the *Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence* and submitted responses to the recommendations in consultation with the Dallas Police Department.

The City of Dallas and the Dallas Police Department (DPD) believe providing a complete investigative and support process for domestic violence victims is essential. DPD is pleased to be in line with the International Chief of Police's recommended Domestic Violence Model Policy. DPD will continue to enhance its processes by:

- Implementing a new Records Management System (RMS) with the capability to immediately
  upload Domestic Violence Supplemental (DVS) and Lethality Assessment Program (LAP) forms,
  enabling relevant officers and staff to immediately access DVS and LAP Forms' data (no sooner
  than two years);
- Updating current policies and procedures to provide a detailed guide on uploading DVS Packets into the RMS along with sending the packets via interoffice mail. Additionally, DPD will perform internal audits to ensure compliance and a Roll Call Training Bulletin will be created;
- Employing the PoliceOne platform to administer annual domestic violence refresher courses;
- Implementing a new RMS with the capability to automatically identify high-risk victims based on
  uploaded LAP forms. Additionally, DPD is developing a web-based reporting system and related
  procedure that will capture LAP form data electronically in the interim (no sooner than two years);
- Ensuring that open positions in the Domestic Violence Unit are filled as quickly as possible;
- Developing a procedure for reconciling the number of LAP forms completed to the number of LAP Forms that are entered into the database.
- Updating relevant standard operating procedures to clarify performance measures, job expectations, and work instructions related to high-risk victims, case workers, and sergeants; and
- Updating relevant standard operating procedures to enhance the existing process.

"Service First, Now!" Connect – Collaborate – Communicate Response to Audit of Dallas Police Department's Efforts to Protect Victims of Domestic Violence March 14, 2025 Page 2 of 2

DPD accepts the risk associated with one medium-risk recommendation. DPD recognizes the importance of connecting high-risk victims with additional resources and will ensure that 100% of high-risk victims are offered information on shelter and counseling services. However, DPD cannot agree to implement this recommendation as there are too many components that are outside of DPD's direct control.

Service First, Now!

-Tolbert (Mar 10, 2025 15:15 CDT)

Kimberly Bizor Tobert City Manager

C: Jack Ireland, Chief Financial Officer Dominique Artis, Chief of Public Safety Michael Igo, Police Chief (I)

Assessed Risk Rating	Recommendations Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date			
Moderate	We recommend the Dallas Police Chief:						
	A.1: In the long term, incorporate the currently hand-written Domestic Violence Supplemental Form and Lethality Assessment Program Form into the Field-Based Reporting (FBR) interface to enable patrol officers to immediately electronically transmit the form data to the Records Management System (RMS).	Agree	FBR is not capable of performing this task. A new RMS system will have this capability and implement the recommendation but will not be purchased any sooner than two years.  Therefore, in the interim, the Dallas Police Department (DPD) is testing a process that allows us to upload the Domestic Violence Supplemental (DVS) and Lethality Assessment Program (LAP) Forms to Evidence.com, allowing relevant officers and staff immediate access to the DVS and LAP Forms' data.	3/31/2028	6/30/2028		
	A.2: In the short term, ensure that both jail staff and patrol station staff upload the Domestic Violence Supplement Packet into the Records Management System by the end of each watch.	Agree	DPD will revise its current policies and procedures to provide a detailed guide for uploading Domestic Violence Supplement Packets into the Records Management System along with submitting the packets via interoffice mail. Internal audits will be created to ensure compliance, and officers will be trained on the process via a Roll Call Training Bulletin.	6/30/2025	12/31/2025		

Assessed Risk Rating	Recommendations	imendations Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<b>A.3:</b> Implement continuous training for patrol officers on documentation procedures for domestic violence cases, including documentation of the reasons behind incomplete <i>Lethality</i> Assessment Program Forms.	rollout in the fall of 2024. Moving forward, DPD will use the PoliceOne platform to administer annual domestic of violence refresher courses.	6/30/2025	12/31/2025	
	A4: Improve the percentage of high-risk victims speaking with a shelter or counselor at the scene.	Accept Risk	DPD recognizes the importance of connecting high-risk victims with additional resources and communicates this to high-risk victims. However, DPD does not have direct control over whether high-risk victims utilize these services or shelter availability. In addition, the usage statistics are tracked by the third-party counseling service, and this data is not shared with DPD. Thus, DPD can not agree to implement this recommendation as too many components are outside of DPD's direct control.  However, DPD will ensure that 100% of high-risk victims are offered information on shelter and counseling services. High-risk victims will receive contact information for these services, both verbally and via a physical copy (written).	N/A	N/A

Assessed Risk Rating	Recommendations		<b>Concurrence and Action Plans</b>	Implementation Follow-Up Date Maturity D			
Moderate	We recommend the Dallas Police Chief:						
	B.1: In the long term, implement a procedure for electronically downloading Lethality Assessment Program Form answers from the Records Management System into the Lethality Assessment Program database and automatically identifying high-risk victims based on the downloaded answers.	Agree	A new RMS system will have this capability and implement the recommendation but will not be purchased any sooner than two years.  In the interim, DPD is developing a webbased reporting system and related procedure that will capture the LAP Form data electronically. The electronic capture of this data will allow for the automatic identification of high-risk victims based on responses within the LAP Form.	3/31/2028	12/31/2028		
	<b>B.2:</b> In the short term, fill the vacant office assistant positions and train the office assistants in entering data from the hand-written Lethality Assessment Program Form into the Lethality Assessment Program database.	Agree	DPD has worked diligently to fill the vacant office assistant position. A qualified candidate was selected but backed out two weeks before the onboarding date. DPD has reposted the position.  DPD will provide and document on-the-job training to the individual on the current processes related to entering data into the LAP database. In addition, DPD will require them to familiarize themselves with the existing SOPs relevant to their assigned duties.	9/30/2025	3/31/2026		

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date	
	<b>B.3:</b> Develop and implement a standard operating procedure (SOP) for the reconciliation between all Lethality Assessment Program Forms that the Patrol Unit completes in the field and the Lethality Assessment Program Forms that are entered into the Lethality Assessment Program database.	Agree	DPD will develop a procedure for reconciling the number of completed LAP forms to the number of LAP Forms entered into the database.	9/30/2025	12/31/2025	
	<b>B.4:</b> Develop and implement clear performance measures, job expectations, procedures, and work instructions for caseworkers on how to identify and follow-up on high-risk victims, and how to document the identification and follow-up process.	Agree	DPD updated the Special Victims Division Domestic Violence Unit Standard Operating Procedures 100.03-7 Caseworker in August 2023 to clarify job expectations. DPD will review related procedures, work instructions, and SOPs, including SVD-DVU SOP 100.03-3 DV Sergeant Responsibilities, to ensure that caseworkers have clear guidance on performing their duties and that performance measures are developed.	6/30/2025	12/31/2025	

Assessed Risk Rating	Recommendations	Concurrence and Action Plans		Implementation Date	Follow-Up/ Maturity Date
	<b>B.5:</b> Develop and implement a standard operating procedure for the high-risk detective's referrals of domestic violence victims to The Family Place and documentation of the reasons for decisions not to refer	Agree	DPD will update the Special Victims Division Domestic Violence Unit Standard Operating Procedures to enhance the process that already exists.	6/30/2025	12/31/2025

### OFFICE OF THE CITY AUDITOR – FINAL REPORT



# Audit of Dallas 311 Call Center Performance

March 14, 2025

# Mark S. Swann, City Auditor

Mayor	Council Members	
Eric L. Johnson	Adam Bazaldua	Jaime Resendez
Mayor Pro Tem	Paula Blackmon	Paul E. Ridley
Tennell Atkins	Zarin D. Gracey	Jaynie Schultz
Deputy Mayor Pro Tem	Cara Mendelsohn	Kathy Stewart
Carolyn King Arnold	Jesse Moreno	Chad West
	Omar Narvaez	Gay Donnell Willis



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# **Executive Summary**

## Objective and Scope

The objective of this audit was to determine if Dallas 311 Customer Service Center meets its performance goals for the average speed of residents' calls answered.

The audit scope covers residents' 311 incoming calls from October 1, 2022, through September 30, 2023.

### Recommendations

Management should:

- Review current performance targets to include caller tolerance for the length of hold times.
- Limit call handle times.
- Hire more call takers and forecast call volume fluctuations and call taker attendance trends.
- Track customers' digital interactions and identify potential issues with the app or web interface.

# Background

The Office of Communications and Customer Experience / 311 call center operates around-the-clock and is staffed by Customer Service Representatives who are trained to receive calls from residents, and based upon their situation, determine which service requests best suit their needs. The 311 service requests are passed along to city departments, who address and solve the problem.

The primary function of the 311-customer service call center is to answer non-emergency questions and serve as a liaison between the caller service request submissions and the appropriate department to address the issue. In Fiscal Year 2023, the Call Center answered 819,899 calls from Dallas residents.

### **Observed Conditions**

In Fiscal Year 2023, the Call Center did meet the speed of answer performance targets for general 311, Auto Pound, and Courts calls. But the Call Center did not meet speed of answer targets for calls related to Dallas Water Utilities. The current staffing levels do not support 311 customer service center's performance goals. There are opportunities to increase online engagement and decrease call volume. The call answering performance targets are not based on an analysis of what length of hold time Dallas callers are willing to tolerate, and the Call Center does not set limits for the length of customer calls.

# **Objectives and Conclusions**

1. Did Dallas 311 meet its performance goals for answering residents' calls during the audit period of October 1, 2022, through September 30, 2023?

**Generally, yes.** The Call Center answers residents' calls in four "queues". The Call Center did meet the speed of answer performance targets for 311 Queue, Auto Pound Queue, and Courts Queue. But the Call Center did not meet speed of answer targets for Dallas Water Utilities Queue and average speed of answer for 311 Queue. (See Observation A.)

## **Audit Results**

Both *City Council Resolution 88-3428* and Administrative Directive 4-09, *Internal Control* prescribe policy for the City to establish and maintain an internal control system. The audit observations listed are offered to assist management in fulfilling their internal control responsibilities.

### **Observation A:** Call Answering Performance

The Dallas 311 call center answers resident calls for service in English and in Spanish in the following call queues:

- Water Queue— calls related to issues with water main breaks, meter leaks, fire hydrant leaks, clogged or overflowing wastewater mains, emergency water turn offs, and other water related issues. The majority of customer service calls to the 311 Call Center, or 42 percent, are water related concerns or questions.
- 311 Queue calls related to animal care and control, city code violations, city parks and trails, storm drains, garbage, recycling, and brush/bulky item collection; homeless outreach and encampments; and other city service requests. About 35 percent of all customer service calls are for these concerns and questions.
- Courts Queue calls related to ticket payment, citation information, filing a complaint, court hearings, court dress code, court requirements, and other court related questions.
   About 13 percent of all customer service calls are for concerns or questions to the Court queue.
- Auto Pound Queue calls related to vehicle search, vehicle location, and vehicle release requirements. About 10 percent of customer service calls are related to Auto Pound.

In Fiscal Year 2023, the Dallas 311 call center had the following monthly performance targets:

- For all queues, achieve an 87-percent satisfaction level with call experience.
- For 311 Queue:
  - Answer calls at average speed of 220 seconds.
  - o Answer at least 60 percent of calls within 90 seconds.
  - Abandon<sup>1</sup> no more than 10 percent of calls.
- For Court Services and Auto Pound Queue:

<sup>&</sup>lt;sup>1</sup> A call is considered abandoned when a customer was on hold for over 40 seconds and hangs up before speaking with an agent.

- Answer at least 45 percent calls within 90 seconds.
- For Water Queue:
  - o Answer at least 45 percent of calls within 90 seconds.

During the audit period of October 1, 2022, through September 30, 2023, the Call Center received 967,891 calls from Dallas residents and answered 819,899 calls. Average annual results show that the Call Center did meet the speed of answer performance targets for general 311, Courts and Auto Pound calls. But the Call Center did not meet speed of answer targets for calls related to Dallas Water Utilities and average speed of answer for 311 calls (See Exhibit 1).

Exhibit 1:

Fiscal Year 2023 Performance

Measure	Target	Actual	Target Met?
Percentage of customers satisfied with call experience	87%	89%	Yes
Percentage of 311 calls answered within 90 seconds	60%	62%	Yes <sup>2</sup>
Percentage of Court Services and Auto Pound calls answered in 90 seconds	45%	58%	Yes
Percentage of Water calls answered in 90 seconds	45%	20%	No
Percentage of 311 calls abandoned monthly	10%	9%	Yes
Average speed of 311 calls answered monthly	220 seconds	411 seconds	No

Source: City of Dallas, the Office of Communications and Customer Experience / 311

As a result, some city residents calling with general inquiry questions or questions related to Dallas Water Utilities may not have been able to connect with a Dallas 311 call takers within the time targets set by Dallas 311. According to Dallas 311, the call answering performance targets are based on historical targets and information from peer cities and industry conferences rather than an analysis of what length of hold time Dallas callers are willing to tolerate.

While Dallas 311 offers a post call customer survey to monitor customer experience with calls related to 311, Water, and Court questions, the survey does not include questions addressing customer satisfaction with the wait time before speaking with a call taker.

<sup>&</sup>lt;sup>2</sup> The target was lowered in Fiscal Year 2023 from 75 percent in Fiscal Year 2022 and was raised to 70 percent in Fiscal Year 2024.

While the target is met by most of the 311 queues, there is an opportunity to reevaluate the 90 second goal to a more obtainable goal. According to a 2014 survey conducted for American Express by the data research company Ebiquity, consumers who call a customer service center are willing to wait, on average, a maximum of 13.0 minutes on hold before hanging up. However, approximately 22.0 percent of customers placed on hold will hang up in less than 5.0 minutes, and an additional 27.0 percent will hang up within 10.0 minutes.

On the other hand, a review of call answering targets reported by other peer cities shows that Dallas 311's speed of answer is largely out of line with other peer cities both for time and percentage goal. (See Exhibit 2).

#### Exhibit 2:

### Comparison of Speed of Answer Targets

City	Target	Goal (percent)	
Dallas, Texas <sup>3</sup>	90 seconds	60%	
Fort Worth, Texas	30 seconds	80%	
San Antonio, Texas	45 seconds	80%	
Chicago, Illinois	45 seconds	85%	
Los Angeles, California	100 seconds	95%	

**Sources**: City of Dallas, the Office of Communications and Customer Experience / 311; 311 National Conference Annual Survey 2021-2022 of programs hosted by CSWeek.org

Research shows that the speed of answering the calls is generally affected by the following factors:

- The length of each interaction with the callers. According to Dallas 311, they do not set limits for the length of customer calls, which impacts call taker availability to answer incoming calls, average speed of answer, and hold times.
- The number of call takers available to answer the calls. During the period from Fiscal Year 2021 to Fiscal Year 2024, the Dallas 311 experienced an average decrease in headcount by 11 call takers (See Exhibit 3). The turnover rate has been improving from 51.7 percent in 2021 to 24.6 percent in 2024.

<sup>&</sup>lt;sup>3</sup> Excluding Court, Auto Pound, and Water related calls.

Exhibit 3:

### Turnover Summary by Fiscal Year

Call Taker Turnover	2021	2022	2023	<b>2024</b> (as of April 23, 2024)
Start Headcount	74	67	67	63
End Headcount	69	76	63	59
Average Headcount	72	72	65	61
Total Terminations	37	38	16	15
Turnover Rate	51.7%	53.1%	24.6%	24.6%

Source: Office of Communications and Customer Experience/311 Turnover Summary.

**Note:** Turnover Rate = Total Terminations/Average Headcount.

While Dallas 311 scheduling is automated with manual changes by a scheduling manager to optimize productivity, the call center does not use all available scheduling system features to forecast call volume fluctuations and call taker attendance trends. According to Dallas 311, this will require an upgrade of the call taking system and additional training by the software vendor.

While Dallas 311 overtime and leave hour totals were higher at the start of the COVID epidemic in 2020, the levels have stabilized over time and the percentage of overtime in Dallas 311 is at about 1 percent of total time. Workday data for the period of March 11, 2020, to June 01, 2024, indicates that Dallas 311 totals of leave hours are reasonable compared to other City departments.

According to the Erlang Calculation<sup>4</sup>, Dallas 311 should hire at least 28 more call takers to consistently achieve speed of answer targets. The optimal staffing level to meet the current performance targets is 93 full-time call takers. The average call taker headcount in Fiscal Year 2023 was 65 and remained the same as of October 11, 2024.

The number of incoming calls compared to web and app traffic. While the numbers of mobile app downloads and service requests coming through the app and web compared to phone calls have been consistently improving (See Exhibit 4), the Dallas 311 currently does not have a capability to track customers' digital interactions and identify potential issues with the app or web interface that may cause customers to abandon the mobile app and website and opt for a phone call instead.

<sup>&</sup>lt;sup>4</sup> Erlang C is a traffic modeling formula used in call centers to determine the number of resources needed to keep the wait times within the call center's service level targets. Erlang C bases its formula on three factors: the number of call takers providing service, the number of callers waiting, and the average amount of time it takes to serve each caller.

#### Exhibit 4:

### Service Request Origin<sup>5</sup>

Source	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2024
Phone Call	67%	66%	61%	62%	60%	56% (as of June 14, 2024)
Digital (App or Online)	33%	34%	39%	38%	40%	44% (as of June 14, 2024)
Total App Downloads	7,973	8,424	8,273	13,362	15,886	15,037 (as of May 31, 2024)

Source: City of Dallas, the Office of Communications and Customer Experience / 311, October 1, 2018, to May 31, 2024. Communications, Outreach, and Marketing / 311 Overview and FAQs, July 5, 2024

### Criteria:

- Standards for Internal Control in the Federal Government:
  - Principle 10 Design Control Activities
  - Principle 12 Implement Control Activities
  - Principle 16 Perform Monitoring Activities

<sup>&</sup>lt;sup>5</sup> One call can result in multiple service requests. However, not every call or app message becomes a service request. For example, out of 819,899 phone calls in Fiscal Year 2023 only 273,801 of the calls were recorded as service requests.

### Assessed Risk Rating:

#### **Moderate**

### We recommend the **Office of Communications and Customer Experience / 311 Director**:

- **A.1:** Perform a review of current performance targets that would include an analysis of caller tolerance for the length of hold times for individual customer queues.
- **A.2:** Develop guidelines for acceptable call handle times depending on the type of call.
- **A.3:** Ensure that Dallas 311 Call Center has enough call takers to meet performance targets for the speed of answering resident calls by hiring more call takers and using scheduling features to forecast call volume fluctuations and call taker attendance trends.
- A.4: Work with the software vendors to obtain customer feedback regarding the app and web interface designs to increase customer app and web traffic.

# **Appendix A:** Background and Methodology

## Background

The three-digit 3-1-1 phone number was first implemented by the Baltimore, Maryland Police Department in October 1996 to address non-emergency police calls. In February 1997, the Federal Communications Commission (FCC) approved the 311 number for nationwide use to assist cities in distinguishing between emergency and non-emergency services. The City of Dallas implemented the 311 system for non-emergency City services in December 1997.

The Dallas 311 call center's Fiscal Year 2024 budget is \$6,331,204, an increase from Fiscal Year 2023 budget of \$5,850,587. The regular Full-Time Equivalent (FTE) budget in Fiscal Year 2024 is 121 and is a decrease from Fiscal Year 2023 Full-Time Equivalent budget of 133. Currently, there are 28 customer service taker vacancies and 3 vacancies in leadership roles.

The Offices of 311 and Communications, Outreach, and Marketing were realigned in July 2024 into The Office of Communications and Customer Experience/311. The Office of Communications and Customer Experience/311 Fiscal Year 2025 Annual Budget is \$9,660,834, a decrease from Fiscal Year 2024 budget of \$10,108,792 for both 311 and Communications, Outreach, and Marketing. The Office of Communications and Customer Experience/311's regular Full-Time Equivalent (FTE) budget for Fiscal Year 2025 is 137, which is decrease from Fiscal Year 2024 combined FTE budget of 148 for both 311 and Communications, Outreach, and Marketing.

Dallas residents typically call for services that address potholes, missed garbage, high weeds, water billing and payment questions, start and stop of water service, court information about tickets, court payments, court dates, the dispatch of field crews for urgent services such as water main breaks, traffic signals out, aggressive dogs, etc. According to Dallas 311, there was a total of 460,117 service requests in Fiscal Year 2023 and 462,682 service requests in Fiscal Year 2024. The tables below show the top ten city departments for service requests submissions (see Exhibit 5), and the top ten types of service requests (see Exhibit 6).

### Exhibit 5:

Top 10 Service Requests by Department

	FY 2023		FY 2024	
Department	Count	Percent	Count	Percent
Sanitation Department	126,709	28%	73,292	16%
Department of Code Compliance	121,473	26%	132,025	29%
Transportation and Public Works Department	95,654	21%	106,951	23%
Department of Animal Services	60,294	13%	72,074	16%
Office of Communications & Customer Experience/311 - 311	17,946	4%	36,106	8%
Dallas Police Department	10,755	2%	12,169	3%
Office of Homeless Solutions	9,514	2%	11,190	2%
Dallas Water Utilities <sup>6</sup>	6,563	1%	6,879	2%
Department of Park and Recreation	3,510	1%	3,901	1%
Planning and Development	2,331	1%	3,281	1%
All Other Departments	5,368	1%	4,814	1%
Total	460,117	100%	462,682	100%

**Source:** City of Dallas, the Office of Communications and Customer Experience / 311

<sup>&</sup>lt;sup>6</sup> The majority of water calls are tracked and resolved through a system separate from the one used for other service requests. This results in a significant gap between the water call volume and the service requests for Dallas Water Utilities.

**Exhibit 6:** 

Top 10 Service Requests<sup>7</sup> by Type

	FY 2023		FY 2024	
Туре	Count	Percent	Count	Percent
City Code Concerns	111,687	24%	124,252	27%
Sanitation Roll Cart Maintenance and Delivery	40,834	9%	40,183	9%
Reports a Parking Violations	32,691	7%	36,440	8%
Missed Garbage Collection	28,402	6%	18,254	4%
Missed Recycling Collection	21,911	5%	5,903	1%
Loose Animals	17,289	4%	15,284	3%
Animals in Need of Care	14,594	3%	14,381	3%
Dead Animal Pick Up	13,532	3%	13,267	3%
Water and Wastewater Line Location	13,380	3%	15,988	3%
Complaints and Compliments	12,930	3%	11,279	2%
All Other	152,867	33%	167,451	36%
Total	460,117	100%	462,682	100%

Source: City of Dallas, the Office of Communications and Customer Experience / 311

# Methodology

The audit methodology included: (1) Interviewing personnel from the Office of Communications and Customer Experience/311. (2) reviewing policies and procedures, the *Dallas City Code*, applicable Administrative Directives; and (3) performing various analysis. In addition, all five components of *Standards for Internal Control in the Federal Government* were considered.

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 upon our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

<sup>&</sup>lt;sup>7</sup> Ranking is based on Fiscal Year 2023.

# Major Contributors to the Report

Nadia Gonzalez – Auditor Anatoli Douditski, MPA, CIA, CFE, ACDA – Engagement Manager

# **Appendix B:** Management's Response

### Memorandum



**DATE:** March 14, 2025

TO: Mark S. Swann – City Auditor

**SUBJECT:** Response to Audit of Dallas 311 Call Center Performance

This letter acknowledges the City Manager's Office received the *Audit of Dallas 311 Call Center Performance* and submitted responses to the recommendations in consultation with the Office of Communications and Customer Experience / 311.

City management recognizes that the 311-customer service center is a valuable tool for assisting City residents and commends them for facilitating answers and resolutions for 819,899 calls in fiscal year 2023. Further, we are pleased that Dallas 311 met the majority of its performance goals during the audit period.

The Office of Communications and Customer Experience / 311 appreciates the valuable recommendations the City Auditor had to improve our processes further.

Specifically, the Office of Communications and Customer Experience / 311 agrees to:

- Review the current performance targets that consider caller tolerance for hold times for individual customer queues;
- Develop guidelines for acceptable call handle times depending on the type of call; and
- Ensure that Dallas 311 Call Center hires an adequate number of call takers to meet performance targets for the speed of answering resident calls and using scheduling features to forecast call volume fluctuations and call taker attendance trends.

While the Office of Communications and Customer Experience / 311 can not agree to implement one moderate-risk recommendation that requires unbudgeted funds and technology enhancements, it agrees to strongly consider the recommendations during the budgeting process and when renewing or soliciting new contracts for technology tools.

Service First, Now!

Kimberly Bizor Tolbert (Mar 11, 2025 15:49 CDT)
Kimberly Bizor Tobert

Kimberly Bizor Tobert City Manager

"Service First, Now!"

Connect – Collaborate – Communicate

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C: Jack Ireland, Chief Financial Officer Elizabeth Saab, Chief of Strategy, Engagement, and Alignment (I)
Daisy Torres Fast, Director, Office of Communications and Customer Experience / 311

> "Service First, Now!" Connect - Collaborate - Communicate

Assessed Risk Rating	Recommendations	C	oncurrence and Action Plans	Implementation Date	Follow-Up/ Maturity Date
Moderate	We recommend the <b>Communicati</b>	mer Experience/311 Director:			
	<b>A.1:</b> Perform a review of current performance targets that would include an analysis of caller tolerance for the length of hold times for individual customer queues.	Agree	Communications & Customer Experience/311 (CCX) will review the current performance targets. Fiscal Year 2025 performance targets will reflect a balance of caller tolerance for hold times for individual customer queues, available resources, including staffing levels and budget, anticipated call volume, and other relevant information.	12/31/2025	3/31/2026
	<b>A.2:</b> Develop guidelines for acceptable call handle times depending on the type of call.	Agree	CCX currently monitors call handle times to identify trends related to longer than anticipated calls. CCX will further formalize this by formally documenting its current process to monitor and audit acceptable call handle times by call type. However, as a forward-facing component of the City Manager's "Service First, Now" initiative, CCX will prioritize customer service and not use individual call handle times as an individual performance metric.	12/31/2025	3/31/2026
	<b>A.3:</b> Ensure that Dallas 311 Call Center has enough call takers to meet performance targets for the speed of answering resident calls by hiring more call takers and using scheduling features to	Agree	CCX will continue to reduce attrition and hire new agents on an aggressive hiring and training schedule. CCX is already coordinating with Information & Technology Services and the vendor to enhance the City's Workforce Management System by adding scheduling features to forecast call	3/31/2026	9/30/2026

Assessed Risk Rating	Recommendations	Co	Concurrence and Action Plans		Follow-Up/ Maturity Date
	forecast call volume fluctuations and call taker attendance trends.		volume fluctuations and call taker attendance trends.		
	<b>A.4:</b> Work with the software vendors to obtain customer feedback regarding the app and web interface designs to increase customer app and web traffic.	Accept Risk	CCX's current software is an off-the-shelf software platform used by several other cities. Customizing the software will incur costs and may not be supported by the vendor.  CCX will revisit the recommendation and consider including more robust feedback tools when developing specifications for a replacement system.	N/A	N/A