

# Baltimore Police Department

Biennial Performance Audit for Fiscal  
Years Ended June 30, 2023 and 2022  
City Auditor, Josh Pasch  
October 22, 2024



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Office of the Comptroller  
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Honorable Bill Henry, Comptroller  
and Other Members  
of the Board of Estimates  
City of Baltimore

## Executive Summary

We conducted a *Biennial Performance Audit of Baltimore Police Department for the Fiscal Years Ended June 30, 2023 and June 30, 2022*. The objectives of our performance audit were to: (1) evaluate the Baltimore Police Department (BPD) effectiveness of the towing process; and (2) follow-up on one finding with two recommendations that were included as part of the previous performance audit report of BPD, dated February 3, 2023. The scope of our audit is fiscal years (FYs) 2023 and 2022; however, certain other matters, procedures, and transactions outside that period were reviewed to understand and verify information during the audit period.

Our original focus was on BPD; however, we subsequently included the Department of Transportation (DOT) in our scope because the towing process is managed by both departments. The BPD requests tow trucks from Medallion certified towing companies<sup>1</sup> (towing companies) which transport vehicles to the DOT Impound Lot or BPD Headquarters or any of the eight police districts<sup>2</sup>. The DOT intakes vehicles, manages the inventory, releases vehicles to owners, and auctions unclaimed vehicles. The BPD processes invoices for vehicles that are towed to BPD headquarters or any of the eight police districts. The DOT processes invoices for vehicles that are towed to the DOT Impound Lot. Our scope includes the entire process except for the vehicle auction process.

We concluded that there are areas that the City of Baltimore (City) needs to improve in serving customers more efficiently. Also, the City needs to improve retaining documentation to demonstrate that the City: (1) follows the City Code and the State Law (see text box); and (2) pays towing expenses properly. Findings are summarized on next page.

### The Maryland Vehicle Law Vs. City Code

- The Maryland Vehicle Law, §25-202, §25-205, and §25-206 provides that the City must send notice via certified mail to the last known registered owner and any secured parties within seven days after taking the vehicle into custody.
- Per Article 31, Section 43 of the City Code, § 31-43, Notice and hearing – In general. “(a) Notice to owner and secured party. (1) Within 2 full working days after the vehicle has been removed to the auto pound, the Director of Transportation must post notice of the owner of the vehicle and, within 7 full working days, must post notice to the secured party by certified mail, return receipt requested, ...”

<sup>1</sup> The City contracts with third parties that are formally known as medallion towing companies to perform City towing services.

<sup>2</sup> The BPD has nine police districts. However, BPD does not have towing companies transport any vehicles to Central District. Towing companies only transport vehicles to the remaining eight police districts.

# Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

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## Baltimore Police Department

The BPD expected the towing companies to arrive at the scene 20 minutes after a tow truck was dispatched. This requirement was removed at the onset of COVID beginning in 2020. However, there was no evidence of BPD monitoring the towing companies' compliance with this requirement prior to COVID. Towing companies taking longer than the established timeframe to arrive at the scene result in higher costs for the City as the time needed for the officer to stay at the scene is increased.

Also, the BPD Fiscal does not consistently maintain supporting documentation for towing invoices<sup>3</sup>. For FY 2022 and 2023, BPD paid 21 invoices totaling \$132,662. The Department of Audits' (DOA) review indicated that BPD was not able to provide towing bills to substantiate five out of 11 invoices (or 45 percent) totaling \$19,176.

## Department of Transportation

The DOT does not clearly and completely communicate critical information to vehicle owners to claim their vehicles in an efficient manner, which may result in delays in releasing vehicles to owners efficiently.

- **Timeliness** – Currently, the DOT manually sends out the notification letters (NL) rather than establishing an automated process in the Autura system. The DOA selected 55 auctioned vehicles to validate if NL were sent to vehicle owners timely. The DOA was unable to test 26 samples because DOT was not able to locate green receipts<sup>4</sup>. Consistently retaining NL is important to demonstrate that DOT is following the City Code and the State Law. Also, it will be challenging for DOT to go to the court if the City needs to prove that the NL were sent timely and DOT receives the returned green cards before auctioning vehicles.
- **Completeness and Clarity** – The NL that is sent to the owner lacks clarity and is missing some information such as: (1) descriptions of the acceptable documents required for proof of ownership and owner identification; and (2) options available to pay the fees and provide their documents either in-person or on-line to re-claim their vehicle.
- **Availability of Information in Multiple Languages** – NL and signage are only available in English. The Baltimore City 2020 Census results show that there was a significant increase in the Hispanic / Latino population and the Asian population. This results in a substantial percentage of the City's population that are negatively impacted.
- **Information in the Vehicle Inventory Systems Are Not Accurate** - All 165 vehicles that DOA judgmentally observed were found in the DOT Impound Lot. However, 75 out of 165 vehicles, or 45 percent were found to be in a different location than what was recorded on the inventory list. If the vehicle is not located on the DOT Impound Lot as recorded in the

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<sup>3</sup> One invoice includes multiple towing bills.

<sup>4</sup> The United States Post Office (USPS) sends out certified mail to acknowledge to the sender that their letter was delivered by the USPS to the address on the letter envelope. The confirmation that the certified letter was received is a receipt returned by the USPS to the sender. This green receipt is signed by the recipient or marked non-deliverable and is returned to the sender. **Source:** USPS

## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

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Vehicle Inventory Systems, then DOT needs to search the DOT Impound Lot to physically locate where the vehicle is located. This creates extra time and additional DOT staff to find the vehicle. Also, it causes an inconvenience to the owner, who now must wait the additional time until his or her vehicle is found.

Additionally, a security-related concern was communicated to the appropriate personnel in the *Confidential Management Comment Limited Use Letter: Baltimore Police Department Biennial Audit for Fiscal Years 2023 and 2022* (confidential management letter). The security related concern was omitted from this public report. The decision to exclude this information was based on *Government Auditing Standards, 2024 Revision, Sections 9.64 – 9.66, Reporting Confidential or Sensitive Information*.

There was one prior year finding with two recommendations, one to the BPD and one to the Department of Finance's (DOF) Bureau of Procurement (BOP), that we followed up as part of this Biennial Performance Audit (See Section II on page 19). The recommendations to the BPD and the BOP were both implemented.

To improve customer service and document retention, we recommend the BPD Commissioner and the Director of DOT implement the recommendations made in this public report and the confidential management letter. Management responses are included in Appendix I (see page 21).

We wish to acknowledge the cooperation BPD, DOT, and DOF extended to us during our audit.

Respectfully,



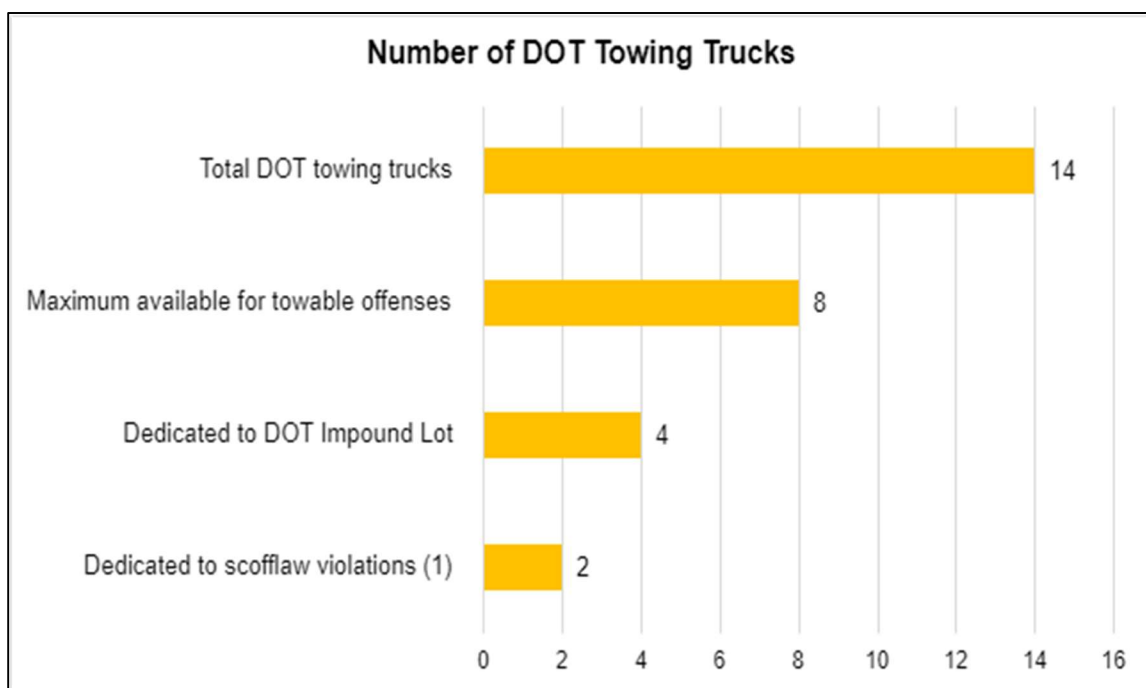
Josh Pasch, CPA  
City Auditor  
Baltimore, Maryland  
October 22, 2024

## Background Information

There are tows initiated by either DOT or BPD. Specifically,

- The DOT tows vehicles on all City property, including but not limited to roads, alleys, “Tow Away Zones”, and public parking lots. It is important to note that the audit excluded the DOT tows. We include the DOT tows in this report for the informational purpose only.

### Exhibit I



**Note:** (1) Scofflaw is the term used to refer to vehicles that are delinquent on three or more citations. Any vehicle on a City roadway with three or more unpaid citations that are all over 30 days old may be booted at any time. Upon booting, the vehicle owner will have 48 hours to unlock the vehicle before it is towed.

**Source:** Above chart is presented based on the data provided by DOT as of August 16, 2024.

- The BPD Towing Unit is responsible for all tows initiated by the police officer and are towed by towing companies either to the DOT Impound Lot or to BPD Headquarters, while all other tows are the responsibility of the DOT Towing Division.

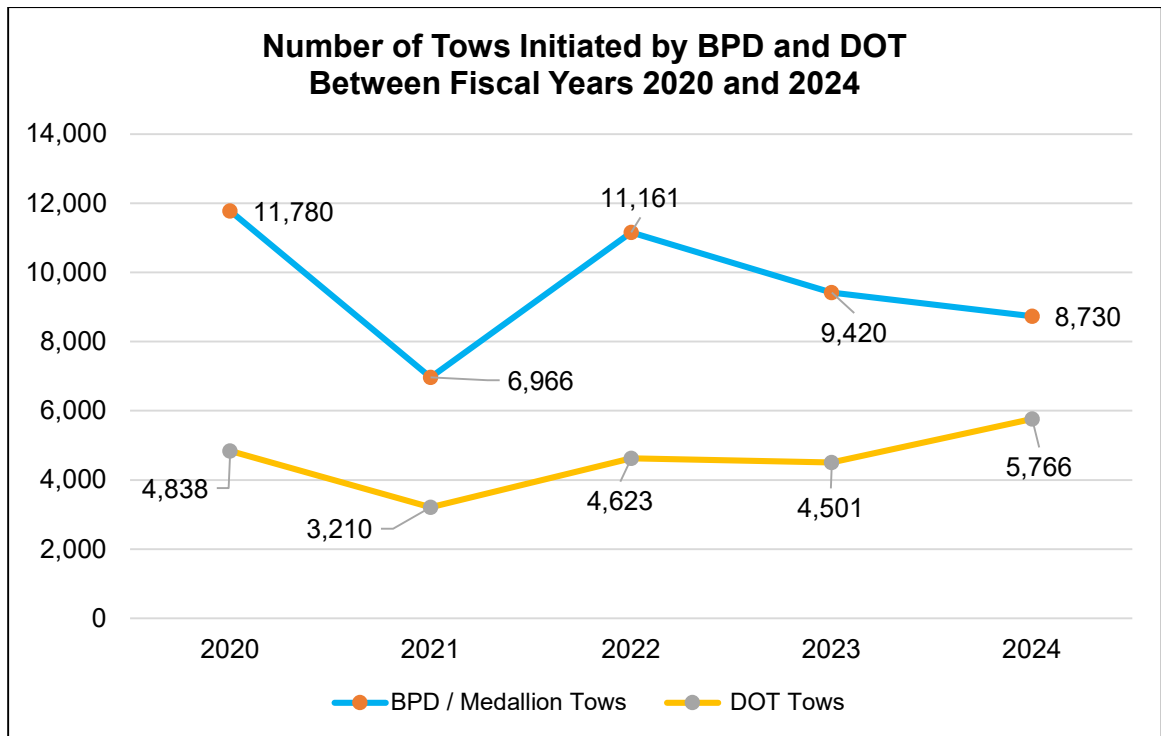
Vehicles that the BPD seized as evidence related to a crime or a criminal investigation are towed to Police Headquarters (crimes that required fingerprinting evidence for homicide, shootings, or search warrants) or any of the eight police districts (for all less serious crimes).

## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

The BPD tows the following types of vehicles to the DOT Impound Lot: (1) stolen vehicles; (2) vehicles involved in accidents with fatalities; and (3) vehicles in a “Tow Away Zone.”<sup>5</sup>

According to BPD, during COVID, some vehicles were towed to a Medallion Lot due to the overflow at the DOT Impound Lot. The DOT was not fully functional during COVID, and vehicle owners were unable to claim their vehicles at the DOT Impound Lot. Exhibit II below shows the number of tows initiated by BPD in the last five FYs.

**Exhibit II**



**Source:** DOA’s analysis based on the data provided by Baltimore City Information Technology (BCIT) Tow Dispatch Report as of April 30, 2021 and DOT as of August 21, 2024

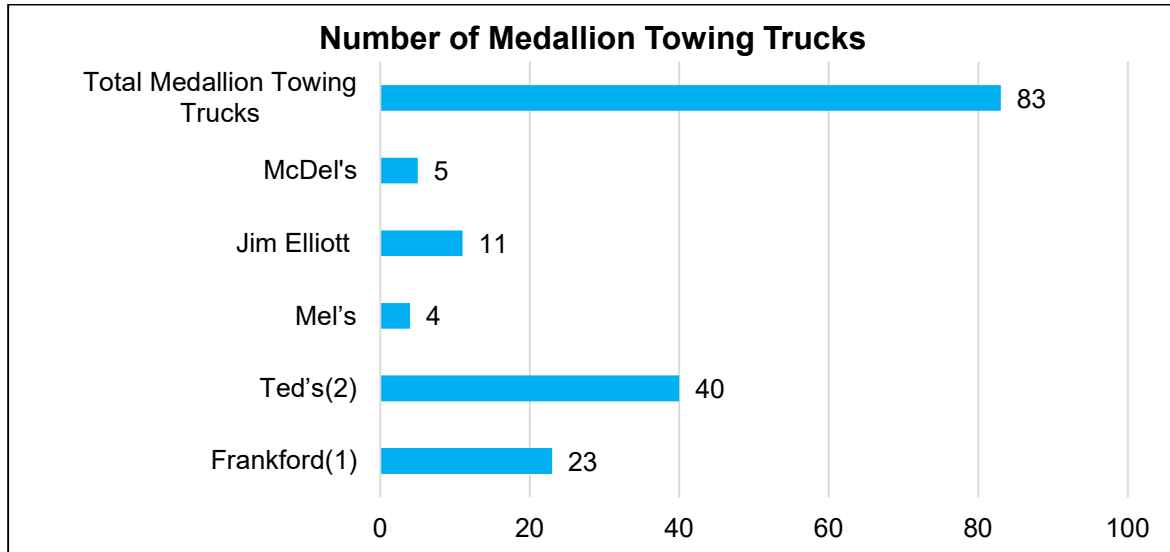
The Medallion only uses three towing companies, Frankford (composed of Frankford, Mel’s and Ted’s), Jim Elliott, and McDel’s for FY 2023 and FY 2022. The current breakdown of the tow trucks is shown in Exhibit III on page 6.

<sup>5</sup> The BPD occasionally initiates that the vehicles in the “Tow Away Zone” are towed to the DOT Impound Lot. The DOT is primarily responsible for towing the vehicles in the “Tow Away Zone”.



# Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

## Exhibit III



**Source:** Above chart is presented based on the data provided by BPD as of September 12, 2024.

**Notes:** (1) Frankford tow truck total includes 19 rollbacks and four snatch tow trucks.  
(2) Ted's tow truck total includes two light duty roll-back, one snatch, two medium duty rollbacks, five medium duty tow trucks, and 30 heavy duty tow trucks.

## Police Initiated Towing Process

When an incident occurs that requires police assistance, a person calls 9-1-1. The 9-1-1 call-taker who answers the call will transfer the call to a police dispatcher who will send a police officer to scene of the incident. Once the police officer arrives and determines a vehicle is should be towed, the BPD towing process is initiated with the request for a tow truck. Below are the steps in the towing process beginning with the request to tow a vehicle until the owner re-claims the vehicle.

- **Request to tow a vehicle:** (1) the police officer contacts the police dispatcher requesting a tow truck; (2) the police dispatcher uploads the information into the Computer Aided Dispatch<sup>6</sup> (CAD) that notifies the police communication unit; (3) the police communication unit at the ECC will call the dispatcher at the Medallion tow



**Picture 1:** Medallion Certified Truck

<sup>6</sup> The CAD system is used in the Emergency Communication Center (ECC) where 9-1-1 calls originate to record all pertinent information relating to the 9-1-1 call.



## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

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company's closest location to the incident to send a tow truck; (4) the Medallion truck arrives at the scene, puts the vehicle on the tow truck, and delivers the vehicle to the DOT Impound Lot; and (5) the police officer notifies the police communication unit to clear and close out the incident in the CAD.



**Picture 2:** Intake Checkpoint

- **Vehicle Intake Process at DOT:** (1) once the Medallion truck arrives at the DOT Impound Lot gated security entrance, they must present a copy of the condensed police report, the tow bill, and the towing pass<sup>7</sup> to the security guard. The security guard will check that there is a Medallion placard on the truck identifying as an authorized towing company; (2) once the tow truck has been authorized to enter the Impound Lot, they will proceed to the intake checkpoint. At the checkpoint, a staff member marks the windshield using waterproof chalk with the reason code for the tow, the vehicle property number,<sup>8</sup> and the date it arrived at the DOT Impound Lot; (3) if the vehicle came

in with keys, they are zip tied in bags to the steering wheel. If the vehicle is unlocked, the vehicle identification number (VIN) on the door panel can be scanned into the vehicle inventory systems (see Significant Systems on page 10) that will pre-populate all the vehicle information recorded from the Motor Vehicle Administration (MVA). If the vehicle is locked, then the information must be manually entered into the vehicle information systems; (4) once the vehicle is done at the checkpoint, it is moved to the drop-off zone where the Medallion truck unloads the vehicle; and (5) the DOT trucks will move the vehicle from the drop-off zone to the location in the DOT Impound Lot that is recorded on the windshield.

- **Vehicle Towed to BPD:** When the vehicles are towed to the Police Headquarters or any of the eight police districts, the incident information on the police report including where the vehicle is located is recorded in Hot Desk's system<sup>9</sup>.

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<sup>7</sup> The towing pass is a card issued to all authorized Medallion tow drivers which is required to gain access into the DOT Impound Lot.

<sup>8</sup> The vehicle property number is a unique identifier that each vehicle is assigned once it arrives at the DOT Impound Lot.

<sup>9</sup> Hot Desk is a unit within the BPD Central Records Section that provides 24-hour service for National Crime Information Center transactions, records information (e.g., police reports), and all communications / administrative messages between law enforcement agencies within the United States and Canada via National Law Enforcement Telecommunications Services. **Source:** BPD

## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

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- If owners are at the scene, BPD lets the owners know the location of their vehicles.
- If owners are not at the scene, they can call Hot Desk to locate their vehicles.
- If owners are hospitalized or incarcerated, the facility (hospital or jail) must send a letter on their letter head where the owners can designate another party to receive the vehicle on their behalf. Once this letter is received by DOT, DOT will work with whoever the owner designates to act on their behalf during that time.
- **Vehicles Released from BPD Custody**
  - Once BPD finishes their investigation on the vehicles held at the BPD Headquarters or any of the eight police districts, they are towed from BPD to DOT Impound Lot.
  - Once BPD finishes their investigation on the vehicles on police hold at the DOT Impound, BPD notifies the BPD representative at the DOT Impound Lot to remove the hold. Then, the BPD representative notifies DOT to release the vehicles. Since January 2023, DOT periodically provides BPD a listing of vehicles on police hold. According to BPD, they review the list to make sure the accuracy of the number of vehicles on the DOT list. If needed, BPD notifies DOT to release vehicles.
  - **Vehicle Release Process at DOT:** If the vehicle has no police holds, DOT notifies the lienholder and owner through certified mail within two full working days from the intake process. After receipt of the certified mail by the lienholder and owner, they have 11 days to claim the vehicle. After 11 days, the vehicle becomes eligible to be put on the schedule for auction. To claim the vehicle after receipt of the certified notification letter, the owner must contact the Towing Division to begin the process and be assigned a tow representative. This process includes providing the appropriate proof of ownership and the owner's identification to the tow representative (which is verified through a lookup on the MVA



Picture 3: A Sign at DOT Impound Lot

## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process

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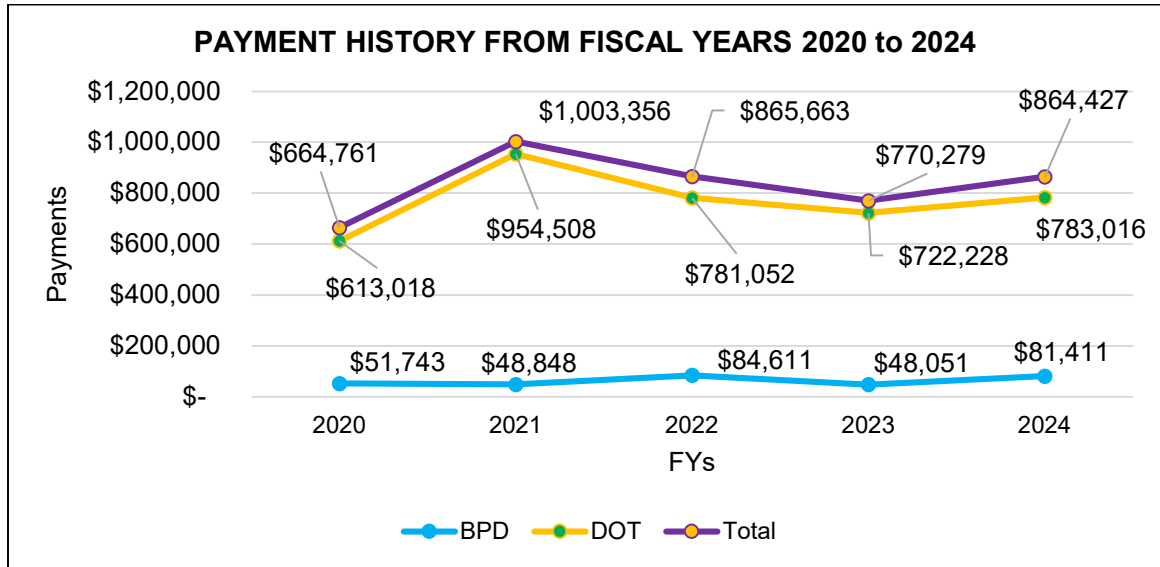
website. Once verified, payment can then be made. Payment is composed of a one-time storage fee of \$50, an admin fee of \$40, a towing fee of \$130, plus any outstanding Baltimore City citations. Presently only credit cards are accepted, and owners can pay online or call the Towing Division. When the owner arrives at the DOT Impound Lot, a towing representative will confirm that the owner has a payment receipt (which the owner received via email). This allows the owner to retrieve their vehicle. The towing representative provides the owner a green pass (that will allow them to pick up their vehicle from the Impound Lot) and a DOT van will escort the owner into the Impound Lot. The owner will be able to drive the vehicle out or arrange to have it towed elsewhere if not drivable (i.e., to the insurance company).

### Others

- **Towing Billing and Payment:** Exhibit IV on page 10 shows towing expenses for the past five FYs. The BPD is responsible for processing invoices for all vehicles towed by Medallion from the scene to either BPD Headquarters or any of the eight Baltimore City Police Districts. The DOT is responsible for processing invoices for all vehicles towed by Medallion from the scene to the DOT Impound Lot.

**Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process**

**Exhibit IV**



**Source:** DOA’s analysis based on CitiBuy and Workday invoices as of September 5, 2024. CitiBuy is the prior system that the City had used before Workday Phase II was implemented in August 2022.

- Significant Systems:** The DOT Towing Division is currently using two vehicle inventory towing systems, IVIC and Autura. The DOT is in the process of transitioning over to the Autura system but is currently running both systems in parallel (inputting all information into both systems to keep them current until the transition process is complete). The IVIC system is located on the City of Baltimore’s mainframe, while the Autura system is cloud-based. The IVIC and Autura systems are not linked, therefore data must be manually inputted from IVIC into Autura. The Autura system is currently not being used to record payments or for the auction process.

## **Objectives, Scope, and Methodology**

We conducted our performance audit in accordance with *Generally Accepted Government Auditing Standards*. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. The objectives of our audit were to:

- Evaluate the BPD effectiveness of the towing process; and
- Follow-up on the prior finding with two recommendations included in the previous Biennial Performance Audit Report, dated February 3, 2023<sup>10</sup>.

The scope of our audit is FYs 2023 and 2022. However, certain other matters, procedures, and transactions outside that period were reviewed to understand and verify the information during the audit period.

Our original focus was on BPD; however, we subsequently included DOT in our scope because the towing process is managed by both departments. Our scope was limited to only the BPD initiated tows beginning at the scene and continuing to the vehicle intake and release process at the DOT Impound Lot. We excluded the vehicle auction process.

To accomplish our objectives, we:

- Conducted interviews and walkthroughs to understand the processes and evaluate risks and controls;
- Visited DOT Impound Lot to observe physical safeguards;
- Reviewed towing related specifications, agreements, and amendments;
- Performed testing to identify payments for non-Medallion certified towing companies;
- Observed DOT performing a physical inventory of vehicles on the DOT Impound Lot;
- Randomly selected 30 vehicles from the DOT Impound Lot and traced them to the DOT inventory systems to make sure vehicle information and location are accurately recorded;

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<sup>10</sup> The prior audit objective was to evaluate whether the BPD Crime Laboratory and Evidence Control has effective and efficient processes and controls over receiving, processing, and sending results for items they receive for analysis in a timely manner.

## **Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process**

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- Judgmentally selected 55 auctioned vehicles to make sure DOT issues the NL timely;
- Reviewed the contents of NL and the DOT website to make sure all necessary information to claim vehicles are completely and clearly stated;
- Judgmentally selected 60 vehicles and tested that DOT reviewed and maintained required documents to identify proof of ownership and owner's identity;
- Judgmentally selected 60 payments to test the accuracy of towing charges and the owner payments;
- Reviewed certain IT controls in the Autura system; and
- Reviewed judgmentally selected periodic listings of vehicles on police hold at the DOT impound.



## **SECTION I: Current Findings and Recommendations**

### **Finding I: The BPD Did Not Monitor the Efficiency Measure for Medallion Certified Towing Companies.**

The BPD expects the towing companies to arrive at the scene 20 minutes after a tow truck is dispatched. Since the onset of COVID beginning in 2020, the BPD informally removed the 20-minute requirement (requirement) to arrive at the scene. Before this time, there was no evidence of BPD monitoring the towing companies' compliance with this requirement.

This is because BPD does not track towing companies' arrival time. However, BPD tracks the following data points in the CAD system: (1) time when the police officer at the scene calls the BPD Dispatch to request a tow; (2) time when the BPD Dispatch contacts towing companies; and (3) the time when towing companies dispatch tow trucks to the scene. In the Hot Desk, BPD tracks the following data points: (1) when the police officer arrives at the scene; (2) date and time the vehicle was towed from the scene; (3) location the vehicle is towed from and to; (4) name of the towing company and truck number that towed the vehicle; (5) reason the vehicle is being towed; and (6) when the police officer leaves the scene.

The requirement is a good efficiency measure to manage time and to prevent the traffic congestion. Towing companies taking longer than the requirement to arrive at a scene result in higher costs for a police officer as the time needed for the officer to stay at the scene is increased. It also affects the time of other parties involved.

The BPD Policy 902, *Towing Procedures*, Communications Section states that:

1. Summons a Medallion Towing Services vehicle upon request, or in an emergency;
2. Ascertains the medallion number of the responding towing vehicle and advises officers of the name, medallion number, and time of notification;
3. Contacts the tow company and ascertains the reason for the delay if the assigned towing vehicle has not arrived within 20 minutes;
4. Cancels the request and advises the officer that the first tow company will not be permitted to tow the vehicle if the towing vehicle will not arrive at the scene within five minutes of the second call;
5. Selects and requests the next closest Medallion Towing Services company and advises the officer when needed;
6. Maintains and records all pertinent information related to tow requests; and

## **Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process**

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7. Maintains a list with 24-hour contact information for BPD contracted rental and leased vehicle towing services.

### **Recommendation I:** We recommend the Police Commissioner:

- Consider reinstating the policy that certified towing companies arrive at the scene 20 minutes after the call requesting a tow from police dispatch in the new contract, and adjusting the time measurement to be realistic based on the current operating environment; and
- Track data and monitor the above policy if BPD decides to keep this performance measure.

**Finding II: BPD Does Not Consistently Maintain Supporting Documentation for Towing Invoices.**

When towing invoices<sup>11</sup> are received, BPD Towing Unit reconciles the invoices with towing bills to validate the charges on the invoices are accurate (matching process). Upon completion of the validation, BPD Towing Unit submits the validated invoices along with towing bills to BPD Fiscal. The BPD Fiscal conducts the secondary review and inputs the records in Workday for processing. However, BPD Fiscal does not consistently maintain towing bills to demonstrate that expenditures were paid properly. For FY 2022 and FY 2023, DOA performed a review of BPD invoices by judgmentally selecting 11 Medallion invoices, or approximately 52 percent of the total of 21 invoices totaling \$132,662 that BPD paid in those FYs. DOA’s review indicated that BPD was not able to provide towing bills to substantiate five out of 11 invoices, or approximately 46 percent. Specifically,

- Four invoices totaling \$13,548 are missing all the Medallion towing bills; and
- One invoice is partially missing some of the Medallion towing bills totaling \$5,628.

According to BPD Fiscal, a temporary employee was responsible for filling the towing bills. The temporary employee was separated from the City. The BPD Fiscal cannot locate the documentation to substantiate the selected invoices for review.

According to the City’s records retention schedule, “Invoices, paid, departmental copies are kept three (3) years...”

**Recommendation II:** We recommend the BPD Commissioner enforce that BPD Fiscal consistently follows the City’s records retention schedule.

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<sup>11</sup> One invoice includes multiple towing bills.

**Finding III: The DOT’s Customer Service to Vehicle Owners Need Improvement.**

The DOT does not clearly and completely communicate critical information to vehicle owners to claim their vehicles in an efficient manner, which may result in delays in releasing vehicles to owners efficiently.

**Timeliness** – Currently, the DOT manually sends out the NLs rather than establishing an automated process in the System. The DOA selected 55 auctioned vehicles between July 1, 2021 and June 30, 2023 to validate if NL were sent timely (see textbox on page 1). Of the 55 samples selected, DOT was not able to locate green receipts (see footnote 4 on page 2) for 26 samples, or 47 percent<sup>12</sup>. Consistently retaining NL is important to demonstrate that DOT is following the City Code and the State Law. Also, it will be challenging for DOT to go to the court if the City needs to prove that the NL were sent timely and DOT receives the returned green cards before auctioning vehicles.



**Picture 4:** Storage - Interior

According to DOT, the cause of not being able to find all samples is because DOT does not keep the green receipts in an organized manner. While the Administrative Building is being renovated, DOT keeps the green receipts in brown cardboard storage boxes in U-Haul storage trailers. These receipts are combined with NL not delivered. The brown cardboard storage boxes are labeled by the dates on the receipt or by FY (i.e. Green Cards 2023). The boxes are stacked with other boxes that contain unrelated documentation.

**Completeness and Clarity** – The NL that is sent to the owner lacks clarity and is missing the following information: (1) directions that describe where the Administrative Building is located, and while the Administrative Building is closed, directions where the temporary trailer is located (that handles the same steps otherwise done in the Administrative Building); (2) descriptions of the acceptable documents required for proof of ownership and owner identification; (3) options available to pay the fees and provide their documents either in-person or on-line to re-claim their vehicle; and (4) directions to receive a secure link to upload documents and / or pay their fees electronically on-line.

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<sup>12</sup> The Maryland Vehicle Law, §25-202, §25-205, and §25-206 provides that the City must send notice via certified mail to the last known registered owner and any secured parties within seven days after taking the vehicle into custody.

## Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process



Picture 5: A Sign in Front of the Administrative Building / Behind the Temporary Trailer

**Availability of Information in Multiple Languages** – The NLs are only in English. The Baltimore City 2020 Census results show that from 2010 to 2020: (1) the Hispanic / Latino population increased by 77 percent from 4.2 percent of the City’s population to 7.8 percent of the City’s population; and (2) the Asian population increased by 46 percent, from 2.3 percent of the City’s population to 3.6 percent of the City’s population. Based on this significant change in the City’s demographics, a substantial percentage of the City’s population are negatively impacted resulting from the NL and signage only available in English.



Picture 6: No Signage in Front of the Temporary Trailer

**Information in the Vehicle Inventory Systems (IVIC and Autura) Are Not Accurate** - On August 25, 2024, the DOA observed the DOT team tracing vehicles from the Inventory List to physical vehicles on the DOT Impound Lot. All 165 vehicles that DOA judgmentally observed were found in the DOT Impound Lot. However, 75 out of 165 vehicles, or 45 percent were found to be in a different location than what was recorded on the Inventory list. <sup>13</sup>This is because DOT incorrectly records vehicle’s location in the vehicle inventory systems. If the vehicle is not located on the DOT Impound Lot as recorded in the vehicle inventory systems, then DOT

needs to search the DOT Impound Lot to physically locate where the vehicle is located. This creates extra time and additional DOT staff to find the vehicle. Also, it causes an inconvenience to the owner, who must wait additional time until his or her vehicle is found.

The DOT believes the cause of the incorrect vehicle location on the inventory list was due to clerical errors. Also, supervisors are supposed to update the systems when vehicles are moved; however, this has not been consistently performed.

Communication is the cornerstone of customer service. Per Article 31, Section 43 of the City Code, § 31-43, Notice and hearing – In general. “(a) Notice to owner and secured party. (1) Within 2 full working days after the vehicle has been removed to the auto pound, the Director of Transportation must post notice of the owner of the vehicle and, within 7

<sup>13</sup> The DOT immediately corrected the errors in the vehicle inventory systems.

## **Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process**

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full working days, must post notice to the secured party by certified mail, return receipt requested...”

**Recommendation III:** We recommend the Director of DOT:

- Update the NL to make sure all required information is complete and clear;
- Consider making this information available in multiple languages in order to serve the diverse population;
- Periodically reconcile the vehicle location information in the inventory systems to the vehicle’s physical location on the DOT Impound Lot; and
- Consider converting to an electronic filing system and establish systematic filing systems to locate records efficiently when needed.





**Biennial Performance Audit Report on Baltimore Police Department – Efficiency of the Towing Process**

No.	Finding	Prior Recommendations	Management’s Self-reported Implementation Status	Auditor’s Assessment
	<p>III. BOP awarded a vendor that did not meet technical requirements specified by BPD.</p>	<p>2. Fill all vacant positions as soon as possible and reassess operations to determine if BOP has the appropriate staffing level to support City procurement activities; and</p> <p>3. Monitor aging reports to identify outstanding procurements and use aging reports in weekly meetings with BPD to prioritize critical contracts for timely completion.</p>	<p>2. The BOP concurs, and it has recommended a written succession plan in addition to a robust recruitment plan in DOF. The recruitment for Chief of Procurement is estimated to begin March 2023. Recommendations as part of the Procurement Transformation Initiative include standardizing procurement positions and training citywide; this will involve both reviewing classifications and identifying potential positions for reclassification for citywide agencies.</p> <p>3. The DOF concurs with the recommendation. It is important to note that in the new Enterprise Resource Planning system, there is an opportunity to customize and pull real time reports in line with BOP mission and vision to provide timely procurements. The DOF is in the process of reviewing both open tickets related to Procurement reports and existing reports to identify opportunities for additional reporting and / or how to effectively utilize current reporting.</p>	

**APPENDIX I**

**Management’s Response to the Audit Report - BPD**

**Date:** October 18, 2024

**To:** Josh Pasch, City Auditor

**Subject:** Management Response to Audit Report:  
Biennial Performance Audit Report on Baltimore Police Department  
for the Fiscal Years Ended June 30, 2022 and 2021

Our responses to the audit report findings and recommendations are as follows:

**Recommendation I**

We recommend the Police Commissioner:

- Consider reinstating the policy that certified towing companies arrive at the scene 20 minutes after the call requesting a tow from police dispatch in the new contract, and adjusting the time measurement to be realistic based on the current operating environment; and
- Track data and monitor the above policy if BPD decides to keep this performance measure.

**Management Response / Corrective Action Plan**

**Agree**                       **Disagree**

The BPD’s objective is to work towards returning to dispatched tow truck’s arrival within the 20-minute timeframe. While we agree that we should return to this standard, it should be noted that it was not suspended lightly, nor will it be reinstated easily. The standard was suspended due to a lack of medallion towers authorized to do this work. Issues with procuring the last contract and the number of approved responsive bids has constrained the pool of available towers. Years ago, there were between seven and nine medallion towers who performed this work, today there are only three. This is what has necessitated that suspension of the timeframe, and its mere reinstatement will not address the problem.

The BPD has recognized this problem and was already in the process of addressing it prior to these audit findings. First, after months of work, BPD has recently obtained a contract for towing dispatch software with the company Autura, that was just approved by the Board of Estimates on October 2, 2024. This software will, among other benefits, allow us to track and monitor the responses of all tow dispatches in a real time manner

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(whereas compiling this information from CAD can be a lengthy and laborious process). This will help us comply with the second bullet of the recommendation.

However, it should be noted that the software will not by itself address the response time issue. We believe that only by growing the pool of available towers will we adequately resolve the problem. To achieve that, we have already begun meeting internally, and plan to include other stakeholders, including procurement, DOT, the towing community, inter alia, to discuss ways to achieve this objective. This may necessitate the changing of regulations, a review of rates, and discussion of procurement options, inter alia, that we hope will result in increased participation in this specific marketplace.

**Implementation Date:** Q3 FY 2025 for implementation of the towing management system. As far as the holistic changes as discussed above, those are on-going and will span many different aspects and stakeholders, our goal is implementation in FY 2026.

- Action Plan Milestone(1): Software integrated into dispatch system. We believe this will take around 90 days. Now that the contract is complete, we are awaiting BCIT approval of the purchase order, the issuance and payment of the invoice and the scheduling of the development team. Assuming that the work commences next month in November, we anticipate the software integration being complete sometime in February 2025. Therefore, we will estimate the completion occurring by February 28, 2025.
- Action Plan Milestone(2): Testing period to get dispatchers comfortable with the system and patrol officers educated on new process and procedures. We believe this will take 30 days after the software is ready for use. Therefore, we estimate that completion and implementation of the system to occur by March 31, 2025 (end of Q3 FY 2025).
- Action Plan Milestone(3): The policy workgroup will be an on-going and regular effort until such changes are achieved to grow the pool of towers. Because of the still to be determined nature of what changes will be needed and /or approved, there is no estimated date of completion. However, our goal is sometime in FY 2026.

### **Responsible Personnel:**

- Andrew Smullian, Deputy Chief of Staff
- Major Derek Loeffler, Office of the Police Commissioner

**Recommendation II**

We recommend the BPD Commissioner enforce that BPD Fiscal consistently follows the City’s records retention schedule.

**Management Response / Corrective Action Plan**

**Agree**                       **Disagree**

We agree. We take the finding as stated and are determined to address the deficiency promptly. Unfortunately, we had two persons leave the agency that would have processed the tow bills in Workday. Currently, the BPD Towing Unit sends the invoice and backup tow tickets to Procurement Fiscal Tech. Procurement Fiscal Tech would enter the data into Workday as the security role requires the ability to use a contract draw.

**Implementation Date:** March 2025

- Action Plan Milestone 1: A contract for Autura, a towing dispatch management software, was approved on October 2, 2024. The BPD is looking forward to the software being able to produce electronic reports showing details of the towing incident, which can then be matched to the invoice alleviating the manual collection of documents. The information needed will be easier to retrieve improving accessibility transparency, and visibility for compliance.
- Action Plan Milestone 2: Until the new implementation, the Procurement Fiscal Tech will sign off to validate all the source information is attached to an invoice as support.
- Action Plan Milestone 3: The backup documentation is voluminous; however, until the new software is implemented, BPD Purchasing will explore if the backup can be scanned and attached in Workday.
- Action Plan Milestone 4: If the backup is not able to be attached, the backup will be stored on a shared-drive until the new software is implemented.

**Responsible Personnel:**

- Paula Williams, Director of Fiscal Services
- Howard Hall, BPD Procurement Supervisor

## **Management’s Response to the Audit Report - DOT**

**Date:** October 22, 2024

**To:** Josh Pasch, City Auditor

**Subject:** Management Response to Audit Report:  
Biennial Performance Audit Report on Baltimore Police Department  
for the Fiscal Years Ended June 30, 2022 and 2021

Our responses to the audit report finding and recommendations are as follows:

### **Recommendation III**

The Director of DOT should:

- Update the NLs to make sure all required information is complete and clear;
- Consider making this information available in multiple languages in order to serve the diverse population;
- Periodically reconcile the vehicle location information in the inventory systems to the vehicle’s physical location on the DOT Impound Lot; and
- Consider converting to an electronic filing system and establish systematic filing systems to locate records efficiently when needed.

### **Management Response / Corrective Action Plan**

**Agree**                       **Disagree**

**Completeness and Clarity** – While there is no written information indicated on the notification letters regarding trailer services, there is signage onsite that gives directions on where to go upon arrival. Once management gained knowledge that the signage had been moved or turned around accidentally, the sign was secured to barriers so it can’t be moved by customers or displaced by weather. Additionally, we are revising the notification letter to add the Towing Division webpage which will provide additional information beyond what is printed on the notification letter. The notification letter revision will be done by November 1, 2024.

**Availability of Information in Multiple Languages** – DOT is currently using a language interpreter system to help aide citizens who speak other languages during our front facing process. We are revising the notification letter to provide additional guidance to non-English speaking individuals. The revision will be done by November 1, 2024.

**Information in the Vehicle Information Systems are not accurate** - Although all vehicles were accounted for, management determined that there were some



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inconsistencies in the data updating process. Due to COVID related process changes, extra steps were involved in the vehicle intake process. We have identified and changed the vehicle entry process thus addressing the vehicle location error concerns. As of October 15, 2024, the security staff will escort the Medallion tow driver to assigned section and monitor the removal of the vehicle, as well as verify that the vehicle has been placed in the correct location within the yard. Eliminating the extra steps to get the vehicle from intake to the correct location in the yard will address the vehicle location issues. Additionally, the security guard adds an extra level of verification. DOT Towing Division will conduct period spot checks also.

**Filing system** – Since transitioning from IVIC to Aries DOT has started using aspects of an electronic filing system. Aries provides the opportunity for documents to be associated with the property ID for each vehicle. Full transition to the electronic system will occur once the Towing Division moves back into the Administration and the new processes are implemented. This timeline is dependent on the renovation completion for the building. Additionally, we have identified that there are some slight filing challenges due to the Towing Division's displacement from the Administration Building. This has been addressed and corrected by creating storage space and a labelling system. Additionally, the newly rehabilitated administration building will be furnished with large card filing cabinets that will incorporate complete property numbers allowing the cards to be arranged properly.

**Implementation Date:** Notification letters will be revised by November 1, 2024

**Responsible Personnel:**

- Tina Wilson, Towing Division Chief
- Tiffany Allen-Owens, Towing Deputy Division Chief