

**The Maryland-National Capital Park and Planning Commission
Office of the Inspector General**

**Traffic Citations
Report Number: CW-001-2025**

March 7, 2025

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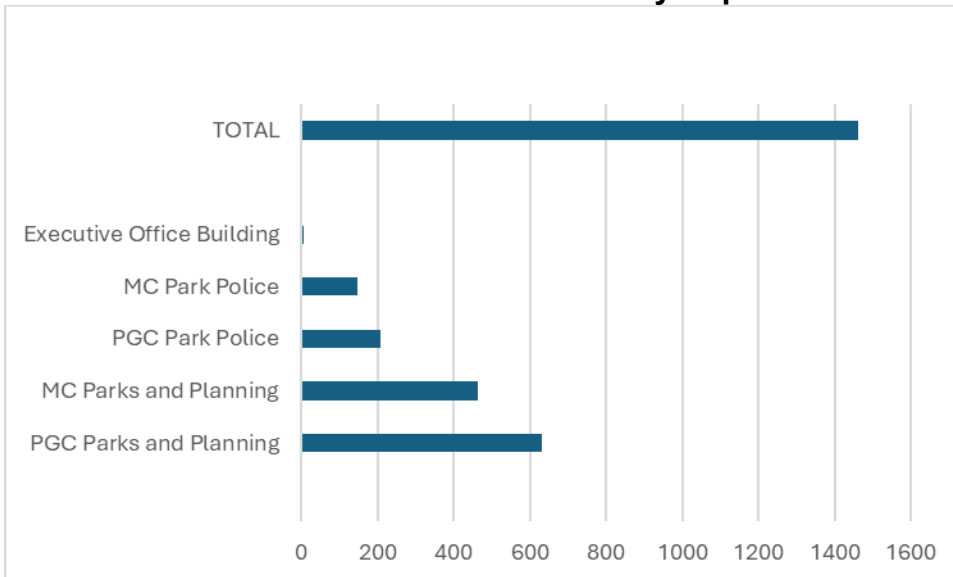
I. EXECUTIVE SUMMARY

A. Overall Perspective

The Maryland-National Capital Park and Planning Commission's (Commission or M-NCPPC) vehicle use program was established to assist with carrying out official business of the agency. The availability and/or use of Commission vehicles is based on work program needs, assigned job duties, and available funding. Only drivers authorized by the Commission may operate agency vehicles. Employees must meet driver eligibility criteria, driving requirements and complete the driver safety training program prior to operating a Commission vehicle.

Commission Practice 6-10, *M-NCPPC Vehicle Use Program*, sets forth the general requirements and criteria for the use of Commission vehicles. The Commission has approximately 1,461 vehicles governed by the Commission's vehicle use program. See Table 1.

Table 1. Number of Commission vehicles by Departments



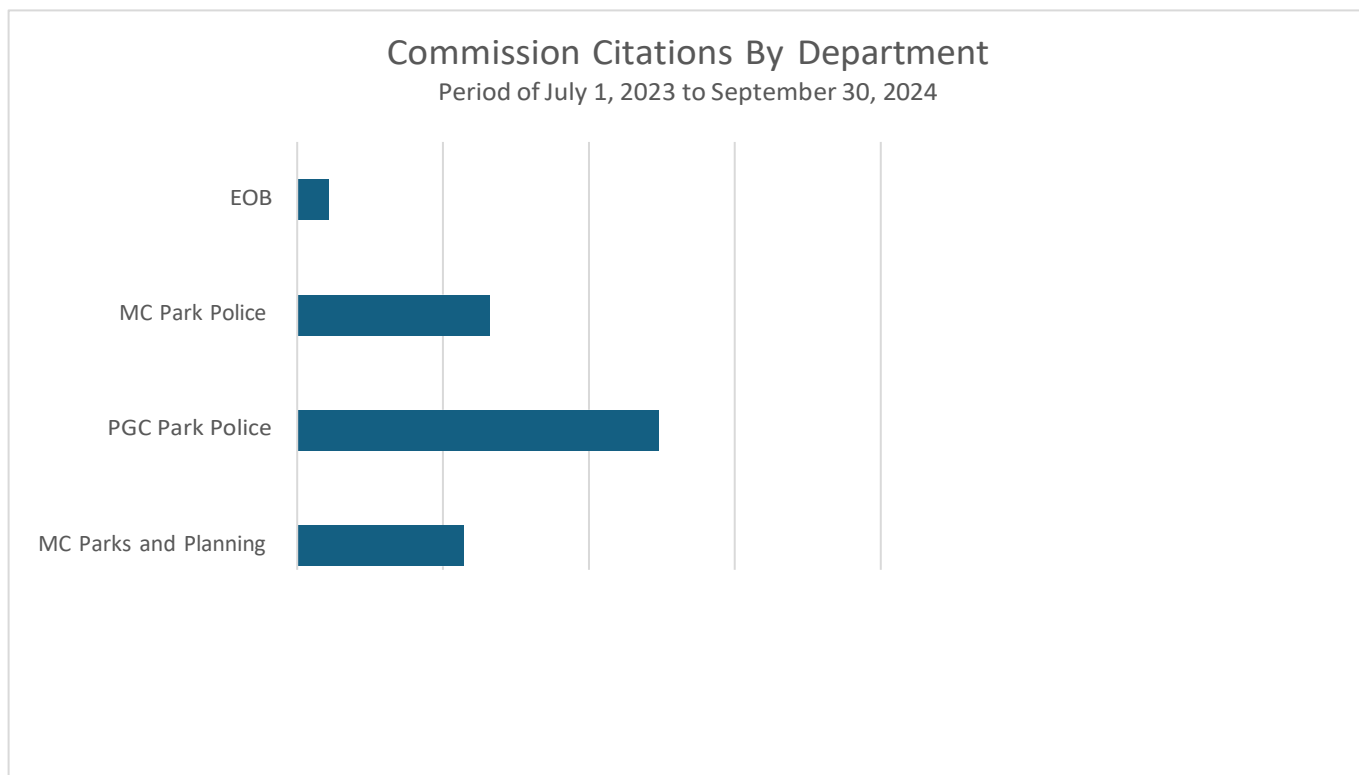
This audit focused on **traffic citations (citations)** captured on camera, issued to Commission employees while driving Commission vehicles. This includes Park Police Officers who **are not** responding to a call¹. Citations may be issued for various reasons such as excessive speed, red light violations or an infraction for

¹ When a Park Police Officer is responding to a call and the vehicle lights have been activated and/or computer aided dispatch (CAD) has been initiated, Park Police will submit evidence of this to the jurisdiction issuing the citation and the citation will be voided.

passing a stopped school bus. Citations are civil citations, not moving violations. They are not reflected on a person's driving record and no points are assessed.

Due to a lack of record keeping of citation documentation throughout the Commission, the OIG was unable to obtain a complete list of citations issued to drivers of Commission vehicles between July 1, 2023 and September 30, 2024 (15 months). The OIG obtained partial lists and copies citations from various departments. However, the OIG could not verify the accuracy and completeness of the citations. Based on the evidence provided, the OIG estimates the Commission received an estimated **566 citations** during the defined audit period. See Table 2. for a breakdown of the citations by department.

Table 2. Commission Citations by Department



Citations are issued by local and regional police agencies in their respective counties and sent to the **Commission Fleet Managers**. The Commission has two Fleet Managers, one in Montgomery County Department of Parks (Parks) and one in Prince George's County Department of Parks and Recreation (DPR). The citations include the date, time, location of the violation, and vehicle license plate number; however, they do not include the name of the driver. Based on the license plate number, the Fleet Managers send the citations to the departmental **Vehicle Coordinators/Administrators**. There are approximately 31 vehicle coordinators in the Commission (17 in Prince George's County and 14 in Montgomery County). The titles and positions of the vehicle coordinators vary throughout the Commission. Vehicle Coordinators may be supervisors and/or

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administrative personnel. The vehicle coordinators must review Commission vehicle mileage logs or appropriate records to identify the cited driver. The citation is then sent to the driver who is responsible for payment of any fines associated with the citation.

Twelve of the 17 vehicle coordinators within Prince George's County confirmed they do not maintain logs or track citations and eight do not retain copies of the citations once forwarded to the driver. All 13 vehicle coordinators in Montgomery County confirmed they do not maintain logs or track citations and they do not retain copies of the citations.

Commission Practice 6-10, *Vehicle Use Program* includes the following requirements for the administration of traffic citations:

- Drivers of Commission vehicles must notify their supervisor immediately but no later than one business day of any citations or moving violations while operating a Commission vehicle.
- Penalties for any violations including moving violations, parking tickets, and other driver-controlled citations are the responsibility of the employee. All fines must be paid in a timely manner. All citations or violations must be reported to the Department Head.
- Departmental vehicle administrators shall:
 - Coordinate the scheduling, availability, and tracking of departmental pool vehicle use.
 - Verify driver's eligibility to operate agency vehicles.
 - Maintain departmental vehicle usage logs for a period of at least three years.
 - Notify facility manager of any security concerns regarding departmental vehicles.
 - Notify the department head of any violations of vehicle use policies.

Commission Employees License Monitoring Program

The Department of Human Resources and Management's Risk Management and Workplace Safety Office (Risk Management) is responsible for administering the Commission's driver safety training program and the License Monitoring Program which oversees employee driving records to ensure individuals meet the Commission's requirements to operate a Commission vehicle. Risk Management **does not** monitor traffic citations.

Prior Audit Report

In January 2018, the OIG issued Audit Report CW-002-2018, *M-NCPPC Vehicle Use Program*. The audit report included a recommendation to the various departments to **"Define Roles and Responsibilities for Monitoring Traffic**

Citations". Specifically, the OIG recommended: "Depending on the Department's structure, roles and responsibilities for monitoring citations should be assigned to the Vehicle Administrator or Fleet Manager. Each Department should be responsible for ensuring appropriate and consistent action is taken for repeat violators". Management generally concurred with the audit recommendation, their complete responses can be found in **Exhibit A**. During this current audit, the OIG concluded that management has not consistently implemented the agreed upon corrective actions to fully resolve the recommendation.

B. Audit Objective, Scope, and Methodology

The objective of this audit was to evaluate internal controls related to monitoring traffic citations and driving records to ensure compliance with Commission policies and procedures. Properly implemented internal controls reduce financial, reputational, and operational risks within the Commission.

Scope

The audit scope included, but was not limited to, the following audit procedures:

- Reviewed current applicable Commission Administrative Policies and Procedures.
- Examined internal Department and Division policies and procedures for the administering and monitoring Commission vehicle citations and license monitoring.
- Interviewed Parks and DPR Fleet Managers to gain an understanding of their standard operation procedures and role in monitoring traffic citations.
- Interviewed pertinent Risk Management personnel.
- Conducted surveys of Vehicle Coordinators to gain an understanding of their standard operating procedures.
- Held discussions with appropriate Park Police representatives and Office of the General Counsel to gain a better understanding of Maryland's Statewide Police Disciplinary Matrix.
- Determined if logs of vehicle citations and/or copies of traffic citations were Maintained.

In addition, the audit scope was designed to identify possible fraud, waste, or abuse within the processes being audited.

The period covered in this review was July 1, 2023 through September 30, 2024.

Scope Limitation

Due to a lack of record keeping, the OIG was unable to obtain a verifiable list of traffic citations issued to drivers of Commission vehicles during the scope period. The number of citations issued are estimates, based on the available data.

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This audit was conducted 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 objective.

C. Major Audit Concerns

The results of our evaluation and testing procedures indicated the following major audit concerns:

1. The Commission does not have an established protocol for administering or tracking traffic citations while operating a Commission vehicle. This is a repeat audit finding.
2. The Commission received a minimum of 566 traffic citations in a 15-month period. Based on our internal interviews and review of supporting documentation, it appears Commission management's actions are primarily limited to ensuring the citations are paid by the vehicle driver. Additional actions are not taken to:
 - Assess violations on a Commission-wide basis
 - Identify repeat offenders
 - React expediently to high-risk citations (e.g. passing a school bus when the red lights are flashing)
 - Escalate concerns to the Department Head and Risk Management
 - Impose appropriate discipline to offenders

Additional information can be found in the Detailed Commentary and Recommendations section of this report.

D. Overall Conclusions

The results of our evaluation and testing procedures indicate significant deficiencies in the internal controls for administration of traffic citations, as noted in the Major Audit Concerns section of this report, see definition below.

We believe all weaknesses identified and communicated are correctable and that management's responses to all recommendations satisfactorily address the concerns. It is the responsibility of management to weigh the possible additional costs of implementing our recommendations in terms of benefits to be derived and the relative risks involved.

We wish to express our appreciation to the Commission's Fleet Managers, Vehicle Coordinators, and departmental management and staff for the cooperation and courtesies extended during the course of our review.

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March 7, 2025

Conclusion Definitions

Satisfactory	No major weaknesses were identified in the design or operation of internal control procedures.
Deficiency	A deficiency in the design or operation of an internal control procedure(s) that could adversely affect an operating unit's ability to safeguard assets, comply with laws and regulations, and ensure transactions are properly executed and recorded on a timely basis.
Significant Deficiency	A deficiency in the design or operation of an internal control procedure(s) which adversely affects an operating unit's ability to safeguard assets, comply with laws and regulations, and ensure transactions are properly executed and reported. This deficiency is less severe than a material weakness, yet important enough to merit attention by management.
Material Weakness	A deficiency in the design or operation of an internal control procedure(s) which may result in a material misstatement of the Commission's financial statements or material impact to the Commission.

II. DETAILED COMMENTARY AND RECOMMENDATIONS

1. Track and Monitor Traffic Citations

Issue: Traffic citations are not tracked or monitored consistently within the Commission. The OIG was unable to obtain a completed and verifiable list of all issued citations for audit purposes.

As described in the background section of this report, departmental vehicle coordinators receive the issued citations directly from the fleet managers. They are responsible for identifying the driver and ensuring all fines and penalties are satisfied. Most vehicle coordinators do not have a tracking mechanism in place for citations.

The Montgomery County Fleet Manager does not have a tracking mechanism in place to monitor all citations received and their status. The Fleet Manager was, however, able to provide OIG with scanned copies of the citations that were forwarded to the vehicle coordinators.

The Prince George's County Fleet Manager logged citation data into a spreadsheet; however, the spreadsheet did not identify the driver or details of the violation. The citations were then forwarded to the various vehicle coordinators and placed in an individual file maintained for each Commission vehicle. Copies of the citations were not readily available for OIG review.

Criteria: Commission Practice 6-10, *M-NCPPC Vehicle Use Program*, states drivers of Commission vehicles must notify their supervisor immediately but no later than one business day of accidents, citations, or moving violations received while operating a Commission vehicle. Without a defined process to track the citations, the policy requirement is unable to be met.

The supervisor must ensure the department head is made aware of any concerns that must be discussed with the Risk Management regarding the information. Loss of driving privileges and/or disciplinary action may result from:

- Changes in a driving record, citations, violations or other restrictions
- Failure to provide timely notification to management.

Cause: Commission management failed to define roles and responsibilities for tracking and monitoring of traffic citations. **This is a repeat audit finding.** Additional details of the prior audit report is provided in Exhibit A of the report.

Risk: The failure to track and monitor traffic citations may result in serious financial and reputational damage to the Commission. High risk offenses such as passing a school bus when the red lights are flashing, or excessive speeds are not escalated to Commission management and Risk Management as

required by Commission Practice. Tracking of citations will identify problem drivers including repeat offenders who may require additional training, disciplinary action, and/or removal of driving privileges.

Recommendation: The Commission must track and monitor traffic citations. It is up to management to determine the specific tracking mechanism, however, the OIG suggests using a web-based platform such as Microsoft SharePoint.

SharePoint allows users to add tasks, assign resources, and update progress on that are displayed along a timeline. Upon receipt of a traffic citation, the fleet managers can enter the known details of the citation (e.g., type of violation, vehicle number, date and time of incident, etc.) into the SharePoint file. Subsequently, the vehicle coordinators can enter the drivers' names. This file can be accessible by Risk Management and Commission management for subsequent follow-up.

Issue Risk: High

Management Response:

With input and information from the Commission's Fleet Managers, vehicle coordinators/administrators, and other relevant staff, the Corporate Policy team will draft Administrative Procedures to accompany *Administrative Practice 6-10, M-NCPPC Vehicle Use Program*. These Procedures will set parameters, guidelines, and responsibilities for tracking traffic citations and include mechanisms for identifying the following:

- driver/employee;
- department;
- date of citation;
- basis for the citation;
- vehicle used;
- fine assessed;
- failure to pay;
- receipt of any prior citation(s); and
- recommendations from Risk Management, Director of Human Resources, and/or other relevant staff, on any restriction and/or loss of driving privileges.

This data will be compiled and tracked by DHRM's Performance Management and Measurement Program and reports will be submitted to the Department Head on a periodic basis.

Expected Completion Date: September 2025

Follow-Up Date: January 2026

2. Develop Internal Procedures for the Administration of Traffic Citations

Issue: The Commission does not have documented internal procedures for the administration of traffic citations. Commission Practice 6-10, *M-NCPPC Vehicle Use Program*, sets forth the general requirements for the use of Commission vehicles, but withstanding an accompanying internal procedure, there is not sufficient guidance available to Commission stakeholders to administer proper oversight of traffic citations.

Criteria: Documented procedures help ensure all incidents are treated consistently throughout the Commission.

Cause: Management has not adequately prioritized the need to develop standard operating procedures for the administration of traffic citations. Currently, the process is decentralized, with each department or office adopting a different process for tracking and reporting.

Risk: Standard operating procedures help ensure all traffic citations are identified, reviewed, and if necessary, acted upon. The lack of standard operating procedures increases the risk of financial and reputational damage to the Commission as serious incidents or repeat offenders are not being tracked or identified.

Recommendation: Commission management should develop consistent internal procedures for administering traffic citations. Ideally, the OIG recommends the development of a Commission-wide Administrative Procedure, with collective input from the departments and Risk Management. Another option would be, each department could complete their own independent standard operating procedures. The procedures should cover topics such as defining responsibilities for key steps in the process (e.g., tracking and monitoring citations, recommending discipline, retaining documentation, etc.)

Issue Risk: High

Management Response: See Management's Response to Audit Recommendation 1.

Expected Completion Date: September 2025

Follow-Up Date: January 2026

3. Assess Violations and Take Appropriate Action

Issue: Departments are not conducting consistent and useful trend analysis to identify drivers that are considered high-risk (e.g., drivers with school bus citations, repeat offenders, and excessive speed violations). As a result, corrective action for high-risk drivers is not being considered. The OIG contacted Human Resource managers in Prince George's and Montgomery counties to determine what disciplinary actions have been assessed for high-risk traffic citations. Both managers confirmed they did not have a record of any disciplinary actions for traffic citations, including drivers who received a school bus violation.

Due to the lack of analysis and tracking of traffic citations throughout the Commission, the OIG was unable to identify all repeat offenders and high-risk drivers. Most violations (437 out of 566 or 77.2%) reported to the OIG **did not** include a reference detailing the cause (e.g., speeding, passing a school bus, red light, etc.) of the citations. Only 129 citations included a referenced cause (see table below).

Table 3. Citations with Identified Cause of Violation²

	No. of Citations
School Bus Citations	49
Excessive Speed*	2
Speeding**	62
Red Light	16
TOTAL	129

* 20 MPH over the speed limit

** MPH driven was not reported

Maryland-National Capital Park Police

The Commission's Park Police Departments accounted for 190 (33.6%) of the citations reported to the OIG during the audit period in review. Per Prince George's County Park Police Division, their Internal Investigations and Disciplinary Procedures Directive PG1500.00, Automated Traffic Citations states:

- A. Automated traffic enforcement citations are considered civil violations in nature. It is the policy of this Division that officers who receive automated traffic citations while operating an agency owned vehicle will satisfy the requirements of the citation through the offered court adjudication options. Absent the criteria listed in XII. B. below, they **are not subject to disciplinary action.**

² Due to the lack of available data, a breakdown by department for the 129 citations referenced in the table is not being provided as it does not provide a complete reflection of Commission-wide citations.

- B. The Chief of Police reserves the right to issue disciplinary action pursuant to the Statewide Police Disciplinary Matrix, based on the totality of circumstances when there is a preponderance of evidence supporting one or more aggravating factors. Aggravating factors may include, but are not limited to, repeated speeding violations in excess of twenty (20) miles per hour over the posted speed limit; dangerous red light or school bus monitoring camera violations; etc.

Montgomery County Park Police have similar directives.

Ten of the 49 (20%) of the school bus violations identified by the OIG were issued to Park Police Officers. In addition, the OIG identified several Officers with repeat offenses. The OIG requested documentation supporting any disciplinary actions assessed during the audit period. Park Police Chiefs were unable to provide the OIG with specific evidence that disciplinary action was assessed above payment of the citations. Park Police Chiefs explained, due to the nature of uniformed and undercover officers' work, there are times when they may violate traffic laws in order to affect a time sensitive stop, capture a subject wanted for a crime, provide backup to fellow officers, etc. However, at all times officers are required to maintain a balance between conducting a public safety act and exercising due regard for the safety of all persons.

Criteria: Per Commission Practice 6-10, *M-NCPPC Vehicle Use Program*, Supervisors must ensure that the Department Head is made aware of any concerns that must be discussed with Risk Management.

The supervisor must ensure that the Department Head is made aware of any concerns that must be discussed with Risk Management regarding the information. Loss of driving privileges and/or disciplinary action may result from:

- Changes in a driving record, citations, violations or other restrictions (see subsection (d) Review of Driver's License Information, Violations, Suspensions, Revocations, and Accidents below).
- Failure to provide timely notification to management.

Cause: Often risks are assessed by probability/likelihood and impact. Commission management has not adequately considered the impact irresponsible driving may have on the Commission and the impact irresponsible driving may have on the physical safety of drivers, pedestrians, and students. If an accident or harm is perpetuated by a repeat offender, the impact of their actions is proliferated.

Risk: The Commission's inability to identify and respond to unsafe drivers increases the reputational risk to the Commission as well as the safety risk to the public.

Recommendation: Departments should conduct a consistent and usable trend analysis to identify drivers that are considered high-risk (e.g., drivers with school bus citations, repeat offenders, and excessive speed violations).

Standard Operating Procedures (see recommendation #2) should include guidance on the treatment of high-risk violations.

Issue Risk: High

Management Response:

Each citation received by Park Police Offices will also be tracked as referenced in Management's Response to Recommendation 1. The citation will be submitted to the appropriate Park Police Chief and Department Head for consideration of the suitability of any disciplinary measures in conformance with the Statewide Police Disciplinary Matrix, any collective bargaining agreement, and/or other applicable guidelines.

Expected Completion Date: December 2025

Follow-Up Date: January 2026

4. Obtain Evidence of a Maryland Driver License

Issue: Nineteen Commission employees, with a Maryland residence, required to drive a Commission vehicle, were not enrolled in the Commission's Driver's License Monitoring Program (LMP). When hired, the employees had an out-of-state driver's license and could not be enrolled. The LMP provides Risk Management with critical information to identify unsafe drivers. Risk Management did not advise the employees that they must obtain a Maryland license or follow-up with the employees 60 days after hire to determine if a Maryland license was obtained.

Risk/Criteria: Drivers not enrolled in the LMP are not monitored by Risk Management. As a result, violations and unsafe activities are not identified and acted upon.

Per Commission Practice 6-10, *M-NCPPC Vehicle Use Program*, individuals must hold a valid driver's license issued by the jurisdiction in which they reside. Individuals are also required to complete the M-NCPPC Driving Requirements and Record Release Authorization Form prior to operating an agency vehicle. By signing the form, drivers acknowledge that they will be enrolled in the Commission's LMP.

Maryland's Motor Vehicle Administration (MVA) requires new residents of Maryland to have a Maryland driver's license within 60 days of being a resident and 30 days for commercial driver's licenses.

Cause: Risk Management does not have an adequate process in place to ensure employees, residing in Maryland, driving a Commission vehicle, obtain a Maryland license.

Note: At the request of the OIG, the 19 drivers were identified by Risk Management at the onset of the audit. Risk Management has taken subsequent action to follow up with the 19 employees and enroll them in the LMP.

Issue Risk: Medium

Recommendation: Risk Management should ensure at the time of initial employment, all Commission employees required to drive a Commission vehicle, residing in Maryland, apply for a Maryland license if they currently have an out-of-state license. In addition, Risk Management should update their current operating procedures to identify this critical monitoring step for approving Commission drivers.

Management Response:

Risk Management will prepare and provide standard communication for dissemination to all new hires whose job functions require the operation of a Commission vehicle or those employees who seek authorization to do so (e.g., employee orientation, defensive driving course attendees, etc.). The communication will inform these employees of the Commission's Licensing Monitoring Program. For those employees who are not Maryland residents and do not possess a Maryland driver's license, Risk Management will follow-up with those employees sixty (60) days after their date of hire, and annually thereafter, to determine if a Maryland driver's license was obtained.

Expected Completion Date: June 2025

Follow-Up Date: January 2026

Exhibit A
M-NCPPC Vehicle Use Program Audit, CW-003-2018
Define Roles and Responsibilities for Monitoring Traffic Citations

Commission management provided the following responses to the audit recommendation:

Montgomery County Department of Parks

The Departmental Vehicle Administrator will review camera-generated tickets and unpaid tolls semi-annually. Repeat violations by the same vehicle or employee will require notification to the Division for appropriate action.

Montgomery County Planning Department

The Departmental Vehicle Administrator will track camera-generated tickets and review them semi-annually. Repeat violations by the same vehicle or employee will be reported to the Division for appropriate action.

The Planning Department does not have EZ Pass transponders for our vehicles. The Departmental Vehicle Administrator will track the unpaid tolls and pay them if they are deemed to be for Commission related business. Any questionable use will be reported to the Department Head and/or The Office of the Inspector General.

Prince George's County Department of Parks and Recreation

We believe our current process assures compliance to the Practice. Prince Georges Park Police receive all citations which are then forwarded to the Fleet Manager who logs the citations and forwards them to the Division Vehicle Administrator. The Division Vehicle Administrator determines the offending driver, assures payment and sends the Fleet Manager confirmation. If a citation does not get paid, a second notice is received and appropriate follow up is made. The vehicle can be taken out of service if the citation is not paid although this has not been necessary.

Prince George's County Planning Department

The Department will assure that all required roles and responsibilities for a Department Vehicle Administrator are assigned.

Central Administrative Services

We concur with the audit recommendation and have a process in place to ensure appropriate review and action for affecting drivers assigned to CAS.