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BY THE U.S. GENERAL ACCOUNTING OFFICE

Report To The Chairman, Subcommittee On Commerce, Justice, State, And The Judiciary Committee On Appropriations United States Senate

Regional Information Sharing Systems

The Regional Information Sharing Systems are multistate organizations funded by the Department of Justice to encourage the coordination of criminal investigations across political jurisdictions. Seven projects provide a central information exchange as well as other services to member state and local law enforcement agencies.

GAO reviewed three of these projects in response to the Subcommittee's questions regarding project management and use of services. The three projects had corrected management weaknesses cited in previous audits and are now following improved national program guidelines. The use of services varied among the three projects; however, in each project, members using services provided most of the data to the information system.

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GENERAL GOVERNMENT
DIVISION

B-199370

The Honorable Paul Laxalt
Chairman, Subcommittee on Commerce,
Justice, State, and the Judiciary
Committee on Appropriations
United States Senate

Dear Mr. Chairman:

As you requested on December 27, 1983, we conducted a review of three of the Regional Information Sharing Systems projects which provide a central information exchange as well as other services to member state and local law enforcement agencies. This report describes actions taken by these projects to resolve audit findings made by the Department of Justice. It also discusses the extent and value of services provided by the projects to their members beyond the primary service of information sharing.

As arranged with your office, we are sending copies of this report to the Attorney General; the Director, Office of Justice Assistance, Research, and Statistics; and the Administrator, Drug Enforcement Administration. Copies will also be available to other interested parties who request them.

Sincerely yours,

W. J. Anderson

William J. Anderson
Director

GENERAL ACCOUNTING OFFICE
REPORT TO THE CHAIRMAN, SUBCOMMITTEE
ON COMMERCE, JUSTICE, STATE, AND THE
JUDICIARY, COMMITTEE ON APPROPRIATIONS
UNITED STATES SENATE

REGIONAL INFORMATION
SHARING SYSTEMS

D I G E S T

The Regional Information Sharing Systems (RISS) are projects funded by the Justice Department to support primarily state- and local-led criminal investigations across political jurisdictions. Seven RISS projects are organized regionally and service members in all 50 states.

The publicly sponsored projects, each administered by a board of directors composed of member state representatives, provide centralized information systems on suspect organizations and individuals operating in a multistate region. The projects also provide such services as analyzing information, providing funds for investigations, lending specialized equipment, providing telephone service, training member agency staff, and providing field staff for technical assistance.

In December 1983, the Chairman of the Subcommittee on Commerce, Justice, State, and the Judiciary, Senate Committee on Appropriations, requested that GAO review three of the seven RISS projects to determine if Justice Department audit recommendations for financial management improvements had been made. It also asked GAO to describe the extent to which projects provide services other than the information system and the value of these services to the information system. (See appendix I.) This report summarizes GAO's review of the three projects and includes details on each project in appendices II, III, and IV. At the request of the Subcommittee, GAO did not obtain agency comments on this report.

IMPROVED PROJECT MANAGEMENT

In response to audit recommendations made by the Justice Department in 1982 and 1983, the three RISS projects reviewed have made financial and administrative management changes. These include better accounting procedures for determining personnel costs, recording advance

payments, and monitoring travel expenses and vehicle use. (See pp. 9 and 10.) Improved management practices have also resulted from the Department's establishment of national program guidelines and increased monitoring of projects.

Published in March 1983, the national guidelines have helped to standardize management procedures and program activities which have heretofore varied among projects. The guidelines set forth uniform definitions of allowable project activities, prohibited direct participation by unsworn field staff in investigations, outlined procedures necessary to properly control the use of project resources, and outlined criteria for the members' use of these resources. Each project GAO reviewed had adopted procedures that conform to or exceed these guidelines and is generally in compliance with its procedures. (See pp. 11 to 13.)

The Office of Justice Assistance, Research, and Statistics in the Department of Justice has increased its project monitoring efforts with the assistance of a Policy Review Board representing legal and intelligence system expertise in the Department. (See pp. 13 and 14.)

USE AND VALUE OF OPTIONAL SERVICES

Each of the projects provides services to its members, such as loans of equipment, funding for investigative support, analytical services, training, and telecommunications, in addition to the exchange of information. These services, termed optional services, are for the most part secondary to the information system in cost and use. Except for telephone services in one project and analytical services in another, each optional service costs less to provide than the information system. (See pp. 16 and 17.) And, with one exception, each optional service is used by fewer member agencies than is the information system. Use of optional services varies among the three projects. (See pp. 17 to 19.)

The value of optional project services is difficult to measure. Because the systems'

primary mission is the maintenance of an information data base, GAO had defined value by the contributions made to the data base. GAO found that law enforcement agencies using optional services were more apt to contribute to the data base than those not using the services.

Those using the services contributed 65, 74, and 87 percent of the information submitted to the three systems in 1983. (See p. 21.) One project service, the provision of investigative support funds, bolsters these statistics by requiring that fund recipients prepare reports, which may ultimately contribute useful data to the system. The users of equipment and analytical services may also contribute reports helpful to the system, although this is not required by federal guidelines.

The use of the other services, however, is not directly related to the information data base. Important to broader project goals, training courses, conferences, and telephone services foster interagency communication and interjurisdictional investigations, according to Justice and RISS project officials. (See pp. 22 and 23.) Training and conferences have resulted in interjurisdictional collaboration, improved ability to use specialized equipment and analytical services, and increased contact among law enforcement personnel in different jurisdictions. Telephone service provides an immediate communication link among agencies.

Contents

		Page
DIGEST		i
CHAPTER		
1	THE REGIONAL INFORMATION SHARING SYSTEMS PROGRAM	1
	Origins and history of the RISS program	1
	RISS program objectives	3
	RISS project organization	5
	Objectives, scope, and methodology	7
2	SYSTEMS PROJECT MANAGEMENT HAS IMPROVED	9
	Projects have resolved Justice's audit recommendations	9
	Justice's guidelines have standardized project management	11
	Oversight and monitoring of the RISS program	13
3	EXTENT AND VALUE OF OPTIONAL PROJECT SERVICES	16
	Cost and use of optional services	16
	Value of optional services	20
APPENDIX		
I	Letter dated December 27, 1983, from the Chairman, Subcommittee on Commerce, Justice, State, and the Judiciary, Senate Committee on Appropriations	24
II	Western States Information Network	25
III	Rocky Mountain Information Network	32
IV	Regional Organized Crime Information Center	39

TABLES

1-1	Structure of Three RISS Projects as of December 31, 1983	6
3-1	Analysis of Project Expenditures, 1983	17
3-2	Percent of Members Using Project Services, 1983	18
3-3	State Membership and Services Used, 1983	19

3-4 Percent of Members Using Optional Services that Placed Information in the Data Base, 1983 21

3-5 Percent of Inputs to Data Base by Users and Nonusers of Optional Services, 1983 21

ABBREVIATIONS

ACISA	Arizona Criminal Intelligence System Agency
ADCD	Arizona Drug Control District
CNIN	California Narcotics Information Network
GAO	General Accounting Office
JMD	Justice Management Division
LEAA	Law Enforcement Assistance Administration
NIN	Narcotics Intelligence Network
OJARS	Office of Justice Assistance, Research, and Statistics
PMD	Program Management Division
RISS	Regional Information Sharing Systems
RMIN	Rocky Mountain Information Network
ROCIC	Regional Organized Crime Information Center
WATS	Wide Area Telephone Service
WSIN	Western States Information Network

CHAPTER 1

THE REGIONAL INFORMATION SHARING SYSTEMS PROGRAM

On December 27, 1983, the Chairman, Subcommittee on Commerce, Justice, State, and the Judiciary, Senate Appropriations Committee, asked us to review three Regional Information Sharing Systems (RISS) projects. These are federally supported multistate projects which support the exchange of information among participating state and local law enforcement agencies. In the past 9 years, the Department of Justice has awarded grants totaling $45.4 million to directly support and administer seven RISS projects. The Subcommittee asked us to review the first three projects funded by the Department of Justice: the Western States Information Network (WSIN), the Rocky Mountain Information Network (RMIN), and the Regional Organized Crime Information Center (ROCIC). Specifically, the Subcommittee asked us to examine (1) the extent to which these projects have implemented management improvements previously recommended by Department of Justice audits and (2) the scope and value of the services that these projects have provided to their members in addition to their primary service of operating an information-sharing system.

ORIGINS AND HISTORY OF THE RISS PROGRAM

What is now known as the RISS program[1] began as a series of discretionary demonstration projects funded by the Federal Law Enforcement Assistance Administration (LEAA) under the Omnibus Crime Control and Safe Streets Act of 1968. The 1968 act supported grants for innovative programs to improve the performance of the criminal justice system at the state and local levels.

The Congress reorganized LEAA through the Justice Systems Improvement Act of 1979 and limited federal support for innovative state and local projects such as RISS to 3 years. In 1980, two RISS projects were to receive no additional funds because of this restriction. However, despite a lack of support for the RISS program from the Department of Justice, the Congress decided to continue supporting the program and has added funds for this purpose to the Department's appropriation each year since 1980.

LEAA funded the first regional information sharing systems project--the Regional Organized Crime Information Center--in

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[1]Other names given to the projects as they developed were State-Local Drug Grants, Drug Strike Force Grants, and Multistate Regional Intelligence Projects.

1974. This project now includes state and local law enforcement member agencies from 14 southern and southeastern states. The Quad State Project (now the Rocky Mountain Information Network) was the second project to be formed, receiving LEAA funding in 1977. In 1980, the Western States Information Network received Justice funding to expand a single state project to a multistate narcotics enforcement coordination effort. (Appendices II through IV describe each of these three projects in detail, and discuss our specific findings regarding each project.)

The New England State Police Administrators Conference received funds from LEAA in 1979 for a project to encourage collaboration and information sharing among New England state police agencies. Two more projects were funded in 1980 under the LEAA authorization: the Mid-States Organized Crime Information Center and the Leviticus project which conducts investigations focusing on coal-related crimes in Appalachia. The seventh RISS project--the Mid-Atlantic Great Lakes Organized Crime Law Enforcement Network--was formed in 1980 to cover eight mid-atlantic states. These seven projects form what is currently known as the Regional Information Sharing Systems which cover the entire country.

Since 1980, the Department of Justice has not requested funds for the RISS program in its budget and has opposed the continuing funding of the program by the Congress. Despite the Department's opposition, the Congress had increased funding for the RISS program each year since the LEAA authorization expired, from $5 million in fiscal year 1980 to $9.9 million in fiscal year 1984.

In opposing continued funding for the RISS program, the Justice Department has argued that (1) funding was originally intended to be seed money provided for a limited time period; (2) Justice cannot adequately control the projects and, therefore, does not want to be accountable for the management of the funds; and (3) the services being provided are the responsibility of state and local governments who should financially support them.

Justice's audit staff, the Justice Management Division, conducted a series of financial and compliance audits of all seven RISS projects from 1982 to 1983. The first audit examined the Regional Organized Crime Information Center, and the last audit examined the Western States Information Network. The Justice auditors found problems in fiscal and internal controls and recommended improvements in financial and compliance procedures.

The Senate report on the fiscal year 1984 appropriation[2] recommended that the projects be restricted to providing only the analysis and dissemination of information and specifically that the projects be restricted from providing funds to state and local law enforcement agencies for purchases of intelligence information. Subsequently, we were requested to review the projects' management and the conduct of other services prior to consideration by Congress of imposing such restrictions by legislation. The Subcommittee asked us to limit the review to the three oldest projects.

RISS PROGRAM OBJECTIVES

The overall goal of the RISS program, as currently stated in the 1983 Justice Department program guidelines, is to "enhance the ability of state and local criminal justice agencies to identify, target, and remove criminal conspiracies and activities spanning jurisdictional boundaries." To accomplish this goal, the guidelines list two main objectives:

1. to encourage and facilitate the rapid exchange and sharing of information pertaining to known or suspected criminals or criminal activity among federal, state, and local law enforcement agencies; and

2. to enhance coordination/communications among those agencies in pursuit of criminal conspiracies determined to be interjurisdictional in nature.

RISS guidelines provide for technical and financial resources to augment existing state and local law enforcement resources and operations as secondary objectives. All RISS projects provide a number of technical and financial services to member organizations in addition to information sharing. The following is a description of the services provided by RISS projects to their members:

(1) The information system: The information system is the primary service provided by each RISS project. State and local law enforcement agencies who are members of the RISS project use the information system to identify other members who are also investigating or have information on a particular individual or organization. RISS projects usually supplement their information system by disseminating bulletins or fact sheets to the members on individuals or criminal organizations operating within their region. Use of the information system is intended to encourage cooperative information sharing and more extensive joint activity among member agencies.

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[2]S. Rep. No. 206, 98 Cong., 1st sess. 33 (1983).

(2) Data analysis: All projects assist member agencies in the analysis of data relating to an investigation. For example, project staff conducted telephone toll analyses which interpreted automated listings of telephone calls made by individuals engaged in criminal conduct. This type of analysis helps investigators document connections among the individuals in a criminal organization and is sometimes displayed in a chart to show known and suspected associations.

(3) Investigative support: RISS projects provide money to members for the purchase of evidence or information or other investigative expenses in support of a multijurisdictional investigation. For example, funds have been used to finance a temporary rental of an apartment for use in a member agency investigation. Only the Leviticus[3] project is permitted under federal guidelines to use these funds directly for its own investigations; the other RISS projects can only award the funds to member agencies that cannot obtain the funds elsewhere.

(4) Specialized equipment: RISS projects have established a pool of investigative equipment for loan to member agencies in an investigation. Member agencies borrow compatible equipment for use by representatives of several jurisdictions in joint investigations. They may also borrow equipment that they could not justify buying for themselves.

(5) Training: Member agencies in RISS projects receive training directly from the project staff, or the project may fund a member's staff training from another source. Projects have provided training courses on such topics as information management and analytical techniques. The primary purposes are to upgrade investigative and intelligence handling skills of agencies and to share information. Some RISS projects hold membership conferences in which member agencies share information on a specific topic or target criminal groups.

(6) Telecommunications: The telecommunications support includes a wide area telephone service (WATS) line for use in contacting the information center. RISS projects also use WATS lines to connect members with other law enforcement agencies through a so-called "patch" call. This service reduces the member's long-distance telephone costs and thus encourages interjurisdictional communication regarding investigations.

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[3]The Leviticus project is so unlike the other RISS projects in this regard that separate guidelines have been proposed to govern its activities. Information in this report is limited to the three RISS projects.

(7) Technical assistance: In addition to the specific services described above, RISS project field representatives provide technical assistance to their members in using the information system and other services. In addition to encouraging participation in the program by potential members, project field representatives follow up on members' use of project resources and assist members in interpreting analyses, requesting funds, and using equipment. Field representatives are strictly prohibited from engaging directly in any investigations.

RISS PROJECT ORGANIZATION

Each of the seven RISS projects is publicly sponsored; is governed by a board representing member agencies from a multistate region; and has both centralized and field staff providing six basic services to its members. Table 1-1 describes the organization of the three projects we reviewed. The primary differences in the three projects are as follows.

--ROCIC is a private nonprofit corporation, operating on behalf of the government sponsor that receives the federal grant (the Metropolitan Government of Nashville, Davidson County, Tennessee). The other two projects are directly operated by government organizations: The Attorneys General of California (WSIN) and New Mexico (RMIN). In all cases, the government organization--as recipient of the grant--is accountable for the project.

--The size of the membership varies. ROCIC limits its membership by requiring continued active participation by members; the other two projects allow all eligible agencies to remain members regardless of their level of participation.

--WSIN, unlike the other two projects, limits its activity to narcotics-related crime. To become a member, an agency must have a narcotics unit.

TABLE 1-1
STRUCTURE OF THREE RISS PROJECTS
AS OF DECEMBER 31, 1983

Project/Location	Public Sponsor	Members		Governing Board	Number of Staff
		Number	State		
Western States Information Network Sacramento, California	California Department of Justice Attorney General	664	California Alaska Hawaii Oregon Washington	Policy Board: 2 representatives from each member state; chaired by California Attorney General	35 headquarters; 8 field staff
Regional Organized Crime Information Center Nashville, Tennessee	Metropolitan Government of Nashville, Davidson County, Tennessee	164	Alabama Arkansas Florida Georgia Kentucky Louisiana Mississippi N. Carolina Oklahoma S. Carolina Tennessee Texas Virginia West Virginia	Executive Board: Executive Director and 6 members elected by membership Review Committee: 1 representative of each state	24 headquarters; 7 field staff
Rocky Mountain Information Network Albuquerque, New Mexico	Attorney General, State of New Mexico	305	Arizona Colorado Idaho Montana New Mexico Utah Wyoming	Executive Board: 2 representatives from each member state; Attorney General, New Mexico	16 headquarters; 14 field staff and support

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of our review were (1) to review the management of three selected RISS projects by assessing the status of recommendations made in Department of Justice audit reports and (2) to describe the extent to which the projects provide services other than the information system and the value of these services to the information system. As requested by the Subcommittee, we did not examine the operation and content of the information system itself since the Subcommittee was primarily interested in the extent and value of services provided in addition to the information system.

To review the management of RISS projects, we reviewed audit reports on the three selected projects prepared by the Justice Department's audit staff, the Justice Management Division, and assessed the adequacy of the projects' responses to the audit findings. When the projects had responded that they were going to institute or had instituted new financial and administrative procedures as a result of the audit, we reviewed a limited number of randomly selected transactions to determine whether the procedures had been instituted and were being followed.

To review the extent and value of services the projects provide their members in addition to information sharing and analysis, we (1) determined the extent to which appropriate internal controls were followed to ensure project accountability for the conduct of these services and (2) assessed the extent to which members use the additional services and the extent to which members using additional services contribute to the projects' information base.

We interviewed officials and reviewed written documents at the Department of Justice in Washington, D.C.; at the headquarters of the Regional Organized Crime Information Center in Nashville, Tennessee; at the Rocky Mountain Information Network in Albuquerque, New Mexico; and at the Western States Information Network in Sacramento, California. We also visited the offices of a nonprofit research group, the Institute for Intergovernmental Research in Tallahassee, Florida. Our work was conducted between February and June 1984 and focused on project activities during calendar year 1983.

In each of the three project offices, we reviewed the project's policies and procedures and compared them with federal requirements. Samples of investigative support funding and equipment loan transactions were reviewed to assess compliance with these procedures. Samples varied among the projects (see appendices for details on each) because of variations in volume and types of services offered. Each sample, however, was drawn randomly from the universe of transactions.

The information data base, analytical services, and training programs were reviewed to assess membership participation and guidelines established for their use. We interviewed project field representatives and their supervisors and reviewed activity data to describe technical assistance functions and to assess compliance with program restrictions. The use of the WATS lines was reviewed through interviews with project managers and staff and through a review of available use data.

An indicator of the value of the services was obtained by reviewing member use of the services in calendar year 1983. We did not conduct a survey of the membership because another survey of RISS project membership was being conducted by the Institute for Intergovernmental Research at the same time as our review.

At the request of the Subcommittee, we did not obtain official agency comments on this report. We discussed the report's content with program officials, and their comments are incorporated where appropriate. Our review was performed in accordance with generally accepted government auditing standards.

CHAPTER 2

SYSTEMS PROJECT MANAGEMENT HAS IMPROVED

The three RISS projects we reviewed have implemented the management improvements recommended in Department of Justice audits by adopting new fiscal and administrative systems restricting the scope of project activities. Many of the problems identified in the audit reports have also been addressed by Justice's program guidelines issued in March 1983. We found that the three projects we reviewed generally comply with those guidelines. The Justice Department has continued to refine the guidelines and has placed increased emphasis on regular monitoring of RISS project management.

PROJECTS HAVE RESOLVED JUSTICE'S AUDIT RECOMMENDATIONS

The Justice Department's audit group, the Justice Management Division, issued audit reports on all seven RISS projects between March 1982 and November 1983. The time periods covered by the audits varied, but included periods between 1980 and 1982. In the three projects we reviewed, the scope of the Justice audits varied. The Rocky Mountain Information Network and the Regional Organized Crime Information Center audits examined administrative and financial systems and program operations, while the scope of the Western States Information Network audit was limited to administrative and financial systems.

We found that all the recommendations made in the audit reports of the three projects we reviewed had been resolved by the projects to the satisfaction of Justice's auditors and the Office of Justice Assistance, Research, and Statistics (OJARS) which administers the RISS program. Statements outlining corrective actions to be taken by each project were developed and agreed to by project and Justice officials.

Projects have adopted recommended improvements in fiscal and administrative systems

In response to recommendations by Justice auditors, each of the three projects we reviewed has adopted new procedures to improve financial and administrative management. (The new procedures are described in detail in appendices II through IV.) We tested the operations of these new procedures and found they were generally being followed.

Each of the three projects had adopted recommended improvements in fiscal and administrative controls to more adequately record and account for charges to the grants. For example, WSIN project management now reviews all charges billed by the grantee prior to submitting the bills to the Justice Department for

reimbursement. This procedure is intended to prevent errors in accounting for personnel costs which Justice auditors found in a previous grant.

In the RMIN project, Justice audit findings were no longer completely applicable. The project subsequently had been reorganized and relocated, and Justice considers this audit closed. However, we noted that the RMIN project was still not properly recording advance payments to two state agencies (Montana and Nevada) which provided working accommodations and other services to project field staff on a reimbursable basis. The project had established appropriate accounts in which to record the advance payments, but reimbursement accounting procedures had not yet been worked out with the state agencies. The RMIN project was also developing its own financial management manual to supplement the New Mexico state accounting system, in accordance with Justice's audit recommendation to the previous grantee.

Travel expenses and vehicle use were two areas in which Justice auditors found problems in their audit of the ROCIC project. ROCIC now has a travel review and monitoring system that provides adequate documentation and control of travel reimbursements. Data on vehicle use is computerized to closely monitor use and maintenance. We found general compliance with the new system, but we suggested to project officials that the project clarify its policy on per diem reimbursements when staff are in travel status for only part of a day. As a result, ROCIC issued a clarifying directive to its members and staff effective April 6, 1984. Other administrative weaknesses cited in the Justice audit have also been corrected. (See appendix IV for details.)

Restrictions on program activities

The Justice auditors recommended two specific restrictions on the types of activities which RISS projects should conduct. Both of those recommendations related specifically to ROCIC but were subsequently incorporated into the Justice's program guidelines issued in March 1983 and applicable to all RISS projects.

1) Activities of unsworn personnel. The Justice audit report on ROCIC recommended that the Justice Policy Board clarify and enforce its policies regarding participation of project staff on member investigations. Federal guidelines applicable to all RISS projects now prohibit project staff from participating in investigations or carrying firearms. We found that the policies and procedures of all three of the projects we reviewed comply with these restrictions.

2) Investigative support. Strict internal controls over funds used to purchase information or evidence were recommended for ROCIC and subsequently were incorporated

into the March 1983 federal guidelines. The projects now follow these guidelines, with the two minor exceptions discussed in the next section.

JUSTICE'S GUIDELINES HAVE STANDARDIZED PROJECT MANAGEMENT

The publishing and monitoring of federal guidelines by the Justice Department has standardized the management of the three projects we reviewed. In March 1983, Justice published guidelines that incorporated and standardized grant conditions placed on individual RISS projects. Justice also developed reporting systems and continues to revise RISS program policy. In addition, the three projects that we reviewed generally comply with current Justice guidelines.

Guidelines restrict activities and define internal controls

As the RISS program has developed over the years, the Department of Justice has attempted to standardize RISS project activities and procedures. Since each project evolved independently and no specific legislative guidance existed, there has been uncertainty within the Justice Department and among RISS projects about the criteria by which projects should be judged. Until 1983, Justice established policies and procedures for each project separately, adding specific conditions to individual grants, but it did not publish standard guidelines for the RISS program as a whole.

However, in March 1983, the Department issued national guidelines for the RISS program, partially in response to the problems identified in the recently completed series of RISS project audits. At the same time, the seven RISS projects had begun developing uniform reporting systems with the assistance of the Institute for Intergovernmental Research, a nonprofit research group that had received a grant from Justice.

In addition to incorporating the Criminal Intelligence Systems Operating Policies (28 C.F.R. Part 23), which define the activities and restrictions on an intelligence system, the March 1983 guidelines describe internal controls required for other services. The guidelines identify the information system as the mandatory service, and allow projects to provide four other activities--investigative support, specialized equipment, technical assistance (field staff), and training--which must be "designed to support the information sharing" component. Draft revisions to the 1983 guidelines were completed in 1984 but had not yet been adopted by the Justice Department as of October 1984. The 1984 draft revisions identify seven permitted program components; make information sharing and analysis the two required services; and define five other "optional" services--telecommunications, investigative support, specialized equipment, technical assistance, and training.

The 1983 guidelines specifically prohibit involvement of field staff in the operational or investigative functions normally associated with the duties of a sworn law enforcement officer, including handling informants, carrying a firearm, participating in surveillance, or directly collecting intelligence.

Funds for investigative support are subject to stringent restrictions and extensive internal controls. The guidelines state that these funds are to be awarded only (1) for interjurisdictional investigations, (2) where information obtained is furnished to the project's data base, (3) where warranted by the merit of the case, and (4) when no other source of funds exists. To ensure that funds are properly spent, the guidelines specify procedures for authorizing and paying of funds to project members, maintaining confidential files including signature cards on all informants, processing and witnessing receipts for services and payments, and reporting expenditures by members receiving funds.

The criteria which RISS project members must follow in providing other optional services are less strict, and the required internal controls are less extensive. Equipment loans, for example, must support the project's mission, but the four restrictions on funds for investigative support listed above need not be met. Loans of surveillance equipment, such as wiretapping equipment, are limited primarily by state laws controlling use of such equipment.

Projects we reviewed generally comply with guidelines

The three projects that we reviewed have adopted policies and procedures that comply with or exceed the March 1983 Justice guidelines and generally follow these procedures. In two cases where projects lacked documentation that applicable procedures were being followed, the projects agreed to revise their procedures.

To review the enforcement of restrictions which prohibit field representatives from engaging in investigations, we examined reporting forms that summarize field staff activities. We found no evidence that field staff were participating in investigations.

On the basis of a sample of 1983 transactions by each project, we found that procedures for awarding and controlling confidential funds were generally followed, with two exceptions. In WSIN, documentation that funds were not available elsewhere was not available in 4 of 14 cases. The project agreed to revise its request and approval procedure to ensure that this documentation was prepared.

In ROCIC, informants' signatures were not always kept on file in the project to allow comparison with receipts submitted by the member agency using the funds. The project staff considered it sufficient if the member agency kept the card and if two witnesses signed the receipt. However, signature cards were on file for all but one of the individual cases we reviewed, and the agency agreed to implement this requirement in all future cases.

The three projects we reviewed also have procedures to control the management of specialized equipment. Each project could account for all items in their current inventories. Both ROCIC and RMIN policies go beyond federal guidelines, requiring loans to be made only in multijurisdictional cases. WSIN does not have a multijurisdictional requirement; however, 17 of the 27 WSIN loans we reviewed involved multiple agencies. WSIN plans to change its requirements so that future awards would be made only if multiagency involvement existed or if the cases have the potential for multiagency involvement. Each of the three projects has follow-up procedures to obtain information from members using specialized equipment which may benefit the projects' information system.

OVERSIGHT AND MONITORING OF THE RISS PROGRAM

The Justice Department's Intelligence Systems and Policy Review Board and the Office of Justice Assistance, Research, and Statistics play major oversight roles in monitoring the RISS program. Justice's close monitoring of the RISS project activities has resulted in more emphasis being placed on refining and standardizing current program guidelines.

Oversight responsibilities of Intelligence Systems and Policy Review Board

Attorney General Order 886-80 dated April 17, 1980, delegates the authority for general oversight and administration of the RISS program to the Director of the Office of Justice Assistance, Research, and Statistics, in consultation with the Administrator of the Drug Enforcement Administration and the Assistant Attorney General in charge of the Criminal Division, Department of Justice. This executive group relies on the Intelligence Systems and Policy Review Board for advice on approving awards to the projects.

The Board is composed of seven Justice Department members and was formed to oversee compliance with the Standards for Criminal Intelligence Operations (28 C.F.R. Part 23). It also reviews other RISS project functions.

In 1982, the Board began making annual site visits to each RISS project to assess compliance with federal guidelines. As of August 1984, the Board had visited each project twice, with the exception of the RMIN which was visited only once because of scheduling problems stemming from the project's reorganization and relocation. In some cases, Board reports to OJARS formed the basis for project changes and improvements. For example, RMIN was reorganized and relocated on the basis of the Board's finding that the state agency serving as grantee was monopolizing the regional resources of the project. In other cases, the Board has raised program policy issues on the basis of its findings. For example, how well the projects can provide direct control over field staff working in off-site locations has been a recurring issue affecting the entire program. Members of the Board's site-review teams we interviewed said they believed that the overall management of the projects had improved substantially since they began their reviews. They saw their role as helping to maintain the integrity of the projects' data base and helping achieve further program improvements.

Office of Justice Assistance, Research, and Statistics administers RISS grants

The daily administration of the grants has been the responsibility of OJARS' Program Management Division. The Division's staff reviews grant proposals, monitors project progress, interprets policy, and administers program restrictions. OJARS has also funded a nonprofit agency to assist it in standardizing program operations and procedures and developing monitoring techniques.

At the three projects we visited, we found that OJARS staff had continually monitored project activities. The project manager, for example, made three on-site inspection visits to one project in 1983 and two visits to each of the other two projects. Correspondence and notes in Justice's project files documented frequent contacts with all three projects.

A nonprofit research organization, the Institute for Intergovernmental Research, was awarded a grant to support monitoring activities by developing standardized descriptions of project activities and a system for agency reporting. Originally, the grant was intended to support a national program evaluation. After the initial data collection phase of the project, however, it became evident that there were no uniform criteria against which to measure project activities. OJARS shifted the grantee's role to working with the RISS project staff to refine RISS program guidelines, including: defining project activities and standards for evaluation; developing uniform quarterly reporting formats (adopted in fiscal year 1983); and exploring policy issues.

Among the areas currently being reviewed and discussed are

--criteria for use and limiting the use of telephone system "patch" calls;

--membership criteria, or under what conditions a law enforcement agency should be able to participate in the program; and

--control over field staff, who are funded by the projects but are located in "host" member agencies under contract with the project.

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The three RISS projects we reviewed have corrected management problems cited in earlier audits by the Justice Department and have adopted standardized management systems as required by national program guidelines. The Justice Department has provided for continued monitoring of project activities and is working with the projects to refine national guidelines.

CHAPTER 3

EXTENT AND VALUE OF OPTIONAL PROJECT SERVICES

Our second objective was to describe the extent to which RISS projects have provided services other than the information sharing system to their members and the value of these services to the information system. From a review of 1983 project files, we found that optional services usually cost less than the information system and are used by fewer members. We were unable to develop a clear measure of the value of optional services. However, we noted that member agencies that used optional services contributed more to project information systems than did non-users of optional services, indicating that providing these services may increase the effectiveness of a project's information system. Further, since Justice and project officials define the RISS program's basic mission as support for interjurisdictional investigations, providing optional services may contribute to the accomplishment of this mission.

COST AND USE OF OPTIONAL SERVICES

With two major exceptions, expenditures for optional services--analysis, investigative support, specialized equipment, training, and WATS telecommunications service[1]--in the three projects we reviewed were less than expenditures for the projects' information systems. Fewer member agencies use optional services than use the information system.

Cost of optional services

Table 3-1 presents the estimated project expenditures for 1983 in the three projects we reviewed. Most of the optional services used a relatively small portion of the projects' annual expenditures. However, there were two major exceptions. ROCIC's telephone service accounted for more than any other specific category in its budget, including its information system. Data analysis was the third largest expenditure category for WSIN and was slightly higher than spending on that project's information system. Analytical services are required in draft 1984 program guidelines, along with the information system.

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[1]Information analysis was considered an optional service during 1983, although it is defined as mandatory in draft 1984 guidelines. Technical assistance by field representatives is not discussed in this analysis because it is not a separate service but supports other project services.

TABLE 3-1 ANALYSIS OF PROJECT EXPENDITURES, 1983			
Type of Expenditure	Percent of project expenditures		
	ROCIC	RMIN[a]	WSIN
Analysis	8.8	5.2	17.9
Investigative support	4.6	4.5	8.9
Equipment	3.6	1.9	6.3
Training	.1	.1	1.2
WATS system	24.7	4.6	3.4
Information service	14.6	6.7	16.0
Field staff	23.0	42.7	27.9
Administrative and unassigned	20.6	34.3	18.4
	100	100	100
Total project expenditures	$1,849,852	$961,469	$1,786,116

[a]May 1, 1983, to March 31, 1984, grant period.

Expenditures for investigative support--the one service where money is directly provided to members--ranged from $28,000 in RMIN to $173,000 in WSIN.[2] The average cash award for all three projects was $905. Unassigned costs are those used for the overall conduct of the organization.

Fewer agencies use optional services than use the information system

Table 3-2 shows the percent of project members that used project services at least once in 1983. With the exception of ROCIC's use of the patch call service, a smaller proportion of the members of the three projects used each of the optional services than used the information system. Overall, 20 percent of the RMIN's members used one or more optional services and 27 percent of WSIN's members used at least one or more optional service. All ROCIC members used at least one optional service primarily because of the high use of telephone service.

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[2]These figures exclude funds provided for "flash rolls" (money displayed by an undercover law enforcement officer to demonstrate ability to purchase contraband) since funds are not actually expended but are returned to the project after use.

TABLE 3-2
PERCENT OF MEMBERS USING PROJECT SERVICES, 1983

Service	ROCIC	RMIN[a]	WSIN
Any optional service	100	20	27
Analytical	10	3	5
Investigative support	38	3	8
Equipment	48	7	6
Training	24	8	b
Patch calls	98	6	18
Information system			
Input	75	40	37
Access	b	32	56

[a]RMIN member use statistics start in May 1983 when the project moved.

[b]Information not available.

These rates should be interpreted in connection with differences in project membership structure. ROCIC has a higher level of participation for all services because its size is limited and all members are required to maintain a certain level of service use. RMIN and WSIN, on the other hand, have larger memberships and allow members to remain "inactive." The sizes of the projects range from 164 members in ROCIC to 305 in RMIN to 665 in WSIN. While WSIN provides analytical services to 5 percent of its members, this represents 75 products to 32 of its 665 member agencies. ROCIC provides analytical services to 10 percent of its members, which represents 21 products to 16 member agencies.

Different service priorities may have also affected these use patterns as the projects have evolved from independent demonstration grants to participants in a more uniform program. The most obvious example is the use of the WATS service in ROCIC. Unlike the other two projects, ROCIC provided this service without restriction as a benefit of participation when the project began in 1975. Calls must now support interjurisdictional law enforcement activity, but no other criteria are imposed. WSIN and RMIN, on the other hand, have defined the service as supportive of specific ongoing or potential interjurisdictional investigations, and each limits use in some way. Consequently, ROCIC patch call use was much higher (median of 438 calls per user member in 1983) than was WSIN (median of 3 calls in 1983) or RMIN (median of 2 calls for half the year).

Another example of different priorities is the practice of loaning equipment. WSIN began as an information system in a state that had an existing equipment pool. Consequently, WSIN's inventory of equipment was less extensive than other projects.

Use of surveillance equipment is illegal in California. WSIN only recently added surveillance equipment to its inventory to serve other states. RMIN, on the other hand, emphasized its equipment loan service when it began and has had an extensive equipment inventory.

In some cases, utilization may be understated because complete data was not available. WSIN participation in training courses, for example, was not available by member. All three projects also provide each member with a bulletin that contains information concerning narcotics trafficking organizations and individuals. A member agency could participate in the program by using this information, but this use would not be recorded in our data. Also, projects hold member conferences during the year where attendees may receive training, but we only included requests for special training programs in our statistics. Also, because most investigations are multijurisdictional, more than one member agency might benefit from a service recorded in the name of a single lead agency.

High use by state agencies is only consistent pattern

We analyzed the 1983 member utilization data to determine if any one type or size agency dominated services across all three projects. The only consistent pattern found was that state member agencies used services in a higher proportion than their representation in the membership.

TABLE 3-3
STATE MEMBERSHIP AND SERVICES USE, 1983

	WSIN	RMIN	ROCIC
Percent of state members to total membership	5	9	12
Percent of times services used by state members in 1983	19	54	17

This pattern held true for all services except investigative support in WSIN and equipment loans in ROCIC. Some possible explanations for this may be (1) a state agency may have more offices or individuals using the project than a single county or municipal office; (2) a state agency may be the coordinator of a multijurisdictional investigation involving other members; and/or (3) a preference by the project for states as recipients of services. In RMIN, where the differences are most pronounced, the state agencies might have been more stable users of the system during its organizational transition in 1983.

The size of municipal and county law enforcement agencies most significantly affected utilization in WSIN, but only when all services, including the information system, were considered. Municipal and county agencies in jurisdictions with a population of more than 250,000 accounted for 7 percent of the membership but 34 percent of all services. However, these numbers were dominated by the number of inputs and accesses to the information system. The largest municipal and county agencies (a population of more than 250,000) used only 13 percent of the optional services. Agencies with a population of less than 25,000 made up 53 percent of the city and county members but used only 13 percent of the services. In both WSIN and RMIN, the highest percent of services was provided to members in cities and counties with populations of 25,000 to 100,000 (36 percent and 43 percent). In ROCIC, the highest percentage was provided to agencies with a population of less than 25,000 (36 percent).

VALUE OF OPTIONAL SERVICES

We were unable to develop a clear measure of the value of optional services. Federal program guidelines state that optional services are to be "designed to support the required information-sharing component." From this perspective, we measured the value of optional services primarily in terms of the information system input made by service users. However, the goal of the program is to "enhance the ability of state and local criminal justice agencies to identify, target, and remove criminal conspiracies and activities spanning jurisdictional boundaries." Using this goal, the value of optional services to the program mission could be judged from the broader perspective that each service encourages interaction among member agencies.

Optional service users contribute more to information system than do nonusers

To address the level of information system input by users of optional services, we compared the input of users and nonusers. We also reviewed a sample of individual cases to determine whether member agencies provided information to the data base after using project services. The projects require that members who use investigative support funds and equipment loans prepare reports which may provide input to the information system. In RMIN and WSIN, a higher percentage of those agencies that used at least one optional service contributed to the information system than those that did not use these services. In ROCIC, nearly all agencies used at least one service--telephone patch calls. However, if this service is omitted, 62 percent of those member agencies who used no other service submitted information, compared to 81 percent that used any optional service.

TABLE 3-4
PERCENT OF MEMBERS USING OPTIONAL SERVICES THAT PLACED INFORMATION IN THE DATA BASE, 1983

	Percent placing information in data base		
	ROCIC	RMIN	WSIN
Used any optional service	81	70	69
Analytical	94	87	72
Investigative support	81	80	90
Equipment	78	86	68
Training	79	72	[a]
Patch calls	76	63	71
Used no optional service	62[b]	33	24
All member agencies	75	40	37

[a]Information not available.

[b]Use of telephone patch call services omitted for comparison purposes.

In fact, the minority of agencies that used services in WSIN and RMIN contributed a majority of the information to the system, as shown in table 3-5.

TABLE 3-5
PERCENT OF INPUTS TO DATA BASE BY USERS AND NONUSERS OF OPTIONAL SERVICES, 1983

	ROCIC[a]	RMIN	WSIN
Users of optional services			
Percent in membership	70	20	27
Percent of total input provided	87	65	74
Nonusers of optional services			
Percent in membership	30	80	73
Percent of total input provided	13	35	26

[a]Use of WATS patch calls omitted for comparison purposes.

We also reviewed a sample of individual investigative support and equipment awards to determine whether the projects obtained impact reports as a result of the investigations that these services supported. In the case of investigative support, federal guidelines specifically require that the user agency agree that information obtained in the investigation will be furnished to the project. Projects implement this requirement in different ways. WSIN, for example, requires that the subject being investigated be submitted to the data file if any funds are to be expended. The other projects require an assurance by the user at the time of the award that impact reporting will be made at the conclusion of the investigation. Out of 255 investigative support fund awards made in the three projects during 1983, we sampled 55 awards and found that each member agency that had used confidential funds had submitted appropriate reports for input to the information system.

In the case of equipment, federal guidelines do not require that equipment be loaned only when users agree to provide data to the information system. However, each project has policies requiring submission of follow-up reports on the use of equipment which could lead to data being submitted to the information base.

Although projects are not specifically required to obtain input to the information system as a result of its analytical services, the nature of this service leads to a high percentage of user agencies placing information in the file. Given the detailed work they are doing for the member, investigation project staff are more aware of the information that can be placed in the file and thus can encourage data entries. WSIN requires each user to submit subject cards on the individuals who are targets of the investigation.

Additional value of optional services to program mission

Office of Justice Assistance and RISS project officials maintain that the value of services to the program's mission should also be measured in terms of the RISS program's broader goals and objectives--not just in terms of data system entries. In this view, optional services support interagency communication and thus work toward enhancing the ability to investigate criminal organizations across jurisdictions. We could not measure this contribution directly, but we found reflections of this view in Justice and project policies for providing optional services.

Long distance telephone service support is partially supported by this rationale, particularly in ROCIC. The ability of law enforcement personnel to call each other without having to have long distance charges budgeted and approved in their agencies removes one potential impediment to information sharing.

ROCIC does not require that calls be made in connection with particular investigations. Because of concerns over the high utilization costs, the project is now directing field representatives to follow up with frequent users of the telephone system to ensure that information on investigations is being shared. WSIN requires that the user agency identify the other law enforcement agency that is being called; RMIN requires that the call be in direct support of the information system or the analytical component, or that the call be in conjunction with a RMIN-supported investigation. In the latter two agencies, the general practice is to use the WATS system in connection with a particular subject or investigation being supported or one that could potentially be supported through the agency.

Training may also enhance interagency communication and foster the program's mission. Collaboration concerning a specific criminal group operating in several jurisdictions is one type of training provided. For example, a major motorcycle gang was the subject of one session in which information was exchanged across jurisdictions. Training sessions on investigative or analytical techniques also may be supportive of joint activities, since member agencies may be able to better share expertise and leads derived from these analyses.

Some project training is meant to improve the use of investigative equipment and/or analytical products provided and may thus be supportive of or encourage the use of other services. Professional contacts made at these sessions may also be helpful in establishing relationships among law enforcement personnel in different jurisdictions.

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The three RISS projects we reviewed have varying patterns of service utilization. For the most part, the optional services appear to be secondary to the conduct of the information system. Member agencies generally use the information system more than they use optional services, and each optional service usually costs less to provide than the information system. When the value of optional services is assessed in terms of input to the information system, it appears that users of these services input more to the data base than do nonusers. The three projects we reviewed are following federal guidelines in providing services to members and in obtaining follow-up information from optional service users.

PAUL LAXALT
NEVADA

COMMITTEE ON APPROPRIATIONS
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December 27, 1983

Dear Mr. Bowsher:

Our Appropriations Committee report No. 98-206 directed the General Accounting Office to conduct management audits of the seven operating projects comprising the Regional Information Sharing System. At a subsequent meeting of committee and GAO staff, it was agreed that GAO would limit the review to three of the seven operating units--the Regional Organized Crime Information Center, the Rocky Mountain Information Network, and the Western States Information Network.

It was also agreed that the management audits would consist of reviewing the status of actions taken by these projects in response to specific recommendations made in the U.S. Department of Justice, Justice Management Division's audit reports. GAO is also to discuss the extent to which these projects provide money and services to members beyond information sharing and analysis, and the value these services contribute to the projects' primary mission.

We would appreciate a detailed briefing on your findings by June 1984, followed by a formal report for the record by October 1984. Because of the short timeframe, we request that you forego seeking formal comments from Justice or the RISS projects. You may contact Mr. Rick Spees of my staff to discuss further details.

Sincerely,

Paul Laxalt

PAUL LAXALT
Chairman
Commerce, Justice, State, and
the Judiciary Subcommittee

The Honorable Charles A. Bowsher
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PL/ssm

WESTERN STATES INFORMATION NETWORK

WSIN is a state of California Department of Justice organization. WSIN's objectives are to: (1) collect, analyze, and disseminate confidential narcotic information on individuals who are involved or associated with major illicit narcotic trafficking; (2) encourage the development of personal relationships and trust among WSIN members; (3) train members in narcotic intelligence collection and analytical techniques; and (4) provide investigative funds and equipment when necessary on multijurisdictional cases.

WSIN is composed of five states: California, Alaska, Hawaii, Oregon, and Washington. WSIN is an outgrowth of the California Narcotics Information Network (CNIN), founded in 1973. CNIN was composed of California law enforcement agencies interested in narcotics traffic in California and had 35 to 40 state and local members. CNIN itself was an outgrowth of the Narcotics Intelligence Network which operated in the Los Angeles area. It evolved, with LEAA funding, into the statewide operation then expanded to become WSIN in 1981.

WSIN is governed by a Policy Board composed of two members from each of the member states and chaired by the Attorney General of California. The WSIN staff of 35 people includes a director; a deputy director; and several managerial, analytical, administrative, and clerical personnel. In addition, liaison personnel, called regional coordinators, are stationed in each member state. Representatives of the Coast Guard, the Customs Service, the Internal Revenue Service, and the Drug Enforcement Administration are housed at WSIN to facilitate coordination with federal agencies.

Law enforcement agencies within the five member states that have a narcotics detail are eligible for WSIN membership at no cost. Upon application to WSIN, the regional coordinator investigates the background of the applicant agency and presents the findings to the Policy Board, and the agency is admitted to membership by majority vote of the Policy Board. As of December 31, 1983, there were 664 member agencies: 59 percent municipal; 21 percent county; 5 percent state; 11 percent federal; 2 percent prosecutors; and 2 percent others.

WSIN's current funding is $4,168,136, which includes the initial $2,146,645 for the period November 1, 1982, through November 30, 1983; $39,967 funded in September 1983 for the purchase of surveillance equipment for loan to member agencies; and $1,981,524 to extend the grant period through December 31, 1984.

JUSTICE MANAGEMENT DIVISION AUDIT RESOLUTION

In June 1983, the Audit Staff, Justice Management Division, completed an audit of the initial WSIN grant. The grant period audited was July 1, 1980, through June 30, 1982. Total expenditures under the grant were $1,968,923. Three recommendations were responded to as follows:

1. Improvements in accounting and administrative controls were made in the California Department of Justice accounting office to ensure proper recording of grant expenditures. The project staff now reviews all charges monthly to certify grant expenditures.

2. A property inventory report was prepared and submitted and was current as of December 1983.

3. The state reimbursed the Department of Justice for charges inappropriately billed to the grant, including salary for one position.

PROJECT SERVICES

WSIN provides numerous services to its member agencies. The objective of these services is to increase law enforcement's effectiveness in identifying and reducing narcotic-related crime by collecting, analyzing, automating, and disseminating information related to narcotic and drug related organized criminal activity. The following sections describe these services and how they contribute to the primary program objective.

Investigative support

WSIN provides financial assistance to member agencies that cannot independently finance an investigation and have no other source of funds available to them. In 1983, 52 member agencies received 86 disbursements totaling $187,930 to fund 62 narcotic investigations.

Use	Number of disbursements	Amount
Purchase of evidence	22	$ 68,700
Payment to informants	6	7,660
Purchase of services	39	47,881
Combination of above	18	48,689
Flash rolls	1	15,000
	86	$187,930

Of the $187,930 disbursed as extraordinary expense funds, $57,142 was returned to WSIN, for a net expenditure of $130,788.

WSIN holds member agencies accountable for extraordinary expense funds by requiring them to: (1) submit a written request for funds signed by a narcotic unit commander or department head; (2) sign a letter of understanding containing conditions governing the use of the funds; (3) provide receipts for expenditures; and (4) submit a report describing the impact of the investigation. WSIN also requires that agencies participating in a multijurisdictional case select one member agency to serve as the "controlling agency" responsible for all extraordinary expense fund transactions made during the investigation.

We randomly sampled 21 of the 62 funded investigative cases and applied federal and WSIN criteria to each case to ascertain whether WSIN complied with prescribed policies and procedures. One case was still open and was dropped from the sample. For the 20 remaining cases, WSIN made 34 disbursements totaling $85,876 to 20 member agencies. Member agencies returned $33,261 to WSIN, for a net expenditure of $52,615. Four cases were terminated and all unexpended funds were returned to WSIN.

Sixteen of the 20 cases in our sample were completed and closed by WSIN. In these cases, WSIN generally followed procedures except that in one case, neither the agency's written request for funds nor the WSIN letter of understanding explicitly stated that funds were unavailable or unobtainable from any other source. This discrepancy was corrected during our audit. On March 12, 1984, WSIN received and placed in the case file correspondence which contained the required statement.

As a condition for obtaining extraordinary expense funds, member agencies must submit data for entry into the WSIN automated data base. The data submitted on subjects targeted in an investigation must meet certain federal requirements (28 C.F.R. Part 23), which relate to privacy and constitutional rights of individuals. After completing the investigation, the agencies submit an impact report containing the following data: number of indictments, number of arrests, contraband seizures, currency seizures, property seizures, and case dispositions.

In those cases where agencies used WSIN extraordinary expense funds, information regarding the subject of the investigation was provided to the WSIN automated data base. We accessed the WSIN data base and verified that, in every case, information regarding specific subjects identified in the 16 closed investigative cases was on hand.

Analytical services

WSIN expended $320,523 in 1983 to provide member agencies with analytical support. Thirty-two agencies working 34 investigative cases received 76 completed analytical products as follows:

--Telephone toll analysis (29)--the automated analysis of telephonic communication made between parties suspected of being involved in narcotic-related criminal activities.

--Link analysis (31)--a graphic illustration or overview depicting associations between individuals, organizations, or other entities involved in narcotic-related activities.

--Visual investigative analysis and event flow charts (8)--presentations of relevant activities and critical events in a logical order or sequence and illustrations of the direction or flow of events or activities in chronological order.

--Case analysis and management systems (4)--a process used to organize large amounts of data into manageable quantities through electronic data processing.

--Other analytical products (4).

Additionally, criminal intelligence analysts conduct research projects covering subjects of interest to narcotic law enforcement agencies, such as: drug-detecting canines, drug price/purity data, narcotic trafficking organizations, and continuous narcotic trend analysis.

WSIN policies and procedures regarding requests for analytical services require that: (1) the written request initiated by a WSIN member agency is directed to the WSIN director, (2) the investigation is multijurisdictional, and (3) the request furthers WSIN's project objectives. In addition, analytical products and services are provided to a requesting agency only if a subject card covering the target of the investigation is in the WSIN data base or is provided to the project for entry into the system.

Specialized investigative equipment

WSIN has an inventory of communications and surveillance equipment that it lends to member agencies for narcotic investigations, including hand-held radios, portable base stations, antenna kits, tape recorders, binoculars, pen registers, night-viewing scopes, cameras, telescopes, and navigational units. During 1983, WSIN lent equipment to member agencies on 54 different occasions.

WSIN lends available equipment when the borrowing agency is a WSIN member, directs either a written or telephone request to WSIN, intends to return borrowed items in 15 days unless prior approval extending the loan period is given, plans to use the equipment in a narcotic-oriented investigation, makes a request

that furthers WSIN's project objectives, assumes responsibility for returning the property in good condition to the equipment pool, and agrees to complete an equipment evaluation and investigative activity report.

In 1984, WSIN acquired a device that could be considered wiretapping equipment, which cannot be used by California law enforcement agencies. If member agencies from the other four states request the device, an official of the agency must first sign an agreement stating that use of the equipment will not be in violation of Title III of Public Law 90-351 or any applicable state laws relating to wiretapping or surveillance.

We took an inventory of all items of equipment and were able to account for each item. For any items not in the property storage facility, we found documentation showing that the items were either on loan or being repaired. We also called three member agencies to verify that the loan records were accurate.

We took a random sample of 27 of the 54 equipment loan transactions made in 1983. We reviewed WSIN's equipment log and a printout on which are recorded the type of case, requesting agency and other agencies involved in the case, request date, and certain impact data. In 17 of the 27 cases, the equipment was requested for use in interjurisdictional cases, but in the other 10 cases, this was not documented. WSIN officials stated that they did not require that the equipment be used for multijurisdictional cases only. However, they agreed that in the future, the requesting agency will obtain equipment for cases that either are multijurisdictional or have such potential.

Training

In 1983, WSIN provided 42 training courses and 1 conference attended by 1,277 participants representing 623 member agencies. Subjects covered in the training were as follows:

--Link analysis - an investigative tool used to illustrate complex interrelationships among subjects of a narcotic investigation.

--Informant management - use, care, and rights of informants involved in narcotic operations.

--WSIN overview - resources, products, and assistance available to member agencies.

--Analytical techniques - investigative support services and products provided by WSIN.

--Narcotic officer survival - techniques and protective measures employed by officers who serve search warrants.

--Drug enforcement overview - techniques used to conduct successful narcotic investigations.

--Marijuana surveillance techniques - means used to identify and locate marijuana plots.

--Telephone toll analysis - automated compilation of telephone communication data used to develop narcotic cases.

WSIN will provide training if the training is requested by a member agency, the training furthers project objectives, and a minimum of 10 students are registered to attend the course. Openings are first filled with member agency personnel, but any remaining openings may be filled with non-member personnel. WSIN also conducts training courses to increase member awareness and use of the automated data base. Course participants are encouraged to provide and extract information from the data base.

Telecommunications services

WSIN has a dedicated telecommunications system comprised of National WATS lines with call transferring and conference call capability. By utilizing this system, member agencies can call WSIN toll-free. Additionally, without expense, these agencies may be "patched-through" by WSIN to other agencies anywhere in the country. WSIN processed 2,012 "patch" calls and received 15,891 calls on WATS lines in 1983.

WSIN's telecommunications services are controlled by monitoring whether calls are made to other law enforcement agencies when warranted; for example, logging in calls, restricting use to members, and providing sanctions for misuse.

Field services

WSIN has eight regional coordinators, four located in California and one in each of the four other states which make up the WSIN project. The four coordinators in California are employees of the state of California. The other four coordinators are employees of their respective states. These positions are funded under contracts between the state of California and each of the other four states. They plan and coordinate all necessary liaison functions needed for the creation, maintenance, and improvement of a viable narcotics intelligence system within a specific geographical area. Regional coordinators conduct various liaison functions between WSIN headquarters and the member agencies by:

--promoting local agency use of WSIN services;

--acting as a "trouble-shooter" for procedural and technical data base related problems that may arise;

--recommending confidential/extraordinary expense fund expenditures to support specific narcotic investigations;

--instructing member agency personnel on the proper handling and care of investigative equipment;

--organizing regional narcotic intelligence sharing meetings for member agencies; and

--performing background investigations on applicant agencies.

In 1983, regional coordinators reported they had made 14,135 agency contacts and attended 423 meetings while providing these field services.

WSIN regional coordinators' duties are confined to liaison and support functions regarding member law enforcement agencies. The coordinators do not directly handle informants or participate in primary investigative activity. The WSIN deputy director supervises the regional coordinators' activities and holds them accountable for their actions by reviewing weekly comprehensive activity recap sheets; receiving daily phone communications from the regional coordinators regarding accomplishments and future endeavors; conducting periodic field inspection trips to member agencies for input concerning the regional coordinators; and holding a regional coordinators' meeting semi-annually at WSIN headquarters.

GRANT MONITORING

Attachment P, Audit Requirements, to Office of Management and Budget (OMB) Circular A-102, Uniform Administrative Requirements for Grants to State and Local Governments, establishes minimum audit requirements for state and local governments that receive federal assistance. Specifically, recipients are required to obtain financial and compliance audits of federal assistance by independent auditors on an entity-wide basis, rather than on an individual award or program basis.

For the year ended June 30, 1983, the state of California's Auditor General Office audited 50 of approximately 300 federal programs to satisfy OMB A-102, Attachment P. Twenty-seven of the 50 were those programs with receipts of more than $30 million and the other 23 were randomly selected from a universe of all other federal programs. The WSIN grant was not one of the programs audited as it was not randomly selected and did not meet the dollar criteria established by the Auditor General's Office for testing.

ROCKY MOUNTAIN INFORMATION NETWORK

RMIN encompasses eight states: Arizona, Colorado, Idaho, Montana, Nevada, New Mexico, Utah, and Wyoming. The project assists state and local law enforcement agencies in combating organized crime, mobile criminal groups, and narcotic trafficking through technical support and the coordination of state, local, and federal law enforcement efforts.

RMIN relocated its office from Tucson, Arizona, to Albuquerque, New Mexico, in May 1983. The former grantee was the Arizona Criminal Intelligence System Agency located in Tucson, Arizona, and the new grantee is the Attorney General of the state of New Mexico. RMIN is governed by an Executive Board composed of two representatives from each member state. The grantee has one member on the Executive Board, and the RMIN project director is an ex-officio, non-voting member of the Board.

A law enforcement agency in a participating state may become a member of RMIN by signing a written agreement which specifies those individuals within the agency authorized to receive RMIN information. Membership must be approved by the two Executive Board members of that state, and final approval is by two-thirds vote of the entire Executive Board. As of the end of 1983, RMIN had a membership roster of 305 law enforcement agencies. The number of member agencies per state is as follows:

State	Number of member agencies
Arizona	35
Colorado	61
Idaho	25
Montana	35
Nevada	30
New Mexico	36
Utah	45
Wyoming	38

RMIN is authorized 16 employees at the project office and a total of 14 employees in the member states (8 state coordinators and 6 support staff). The project director is appointed by and responsible to the Executive Board. The project director is assisted by a deputy director (who also doubles as the field service manager), an intelligence service manager, a financial manager, and an administrative manager.

The state coordinators (with the exception of the state of New Mexico) work for the project but are located in their respective states as part of the state host agency. Professional service agreements between the state host agencies and

RMIN spell out duties and responsibilities of the state coordinator and the host agency.

In April 1983, OJARS approved the award for the grant to the New Mexico Attorney General's Office for the operation of RMIN. The award was for an 11-month period starting May 1, 1983, and ending March 31, 1984. The award was for a total of $1,205,743. This grant was extended through November 30, 1984, with additional funding of $916,300 to cover the extension. The total figure for the grant is now $2,122,043.

JUSTICE MANAGEMENT DIVISION AUDIT RESOLUTION

In June 1982, the audit staff of the Justice Management Division issued an audit report on RMIN, Grant No 80-CJ-AX-0055, covering the period of May 5, 1980, through February 12, 1981. The grantee for RMIN during this time frame was the Arizona Criminal Intelligence System Agency in Tuscon, Arizona (ACISA). The six audit recommendations covered the development of a separate project financial management manual, support and recovery of unallowable costs charged to the grant, and the restriction of aircraft to investigative support use only.

As of December 23, 1982, all six of the recommendations except one requiring a final expenditure report of the Arizona grantee had been cleared by the Office of Justice Assistance, Research, and Studies and the grantee. The grantee stated that it would get the report filed on this grant no later than January 15, 1983, but the final expenditure report on this grant had still not been received as of October 1984.

For all practical purposes, audit recommendations are not currently relevant, because ACISA is no longer the grantee for RMIN. OJARS considered this audit closed. In view of the change in grantees, we could not determine whether current practices adhere to the agreed upon resolutions, but we did examine the new grantee's financial management procedures to see if similar problems might exist. We found two areas similar to the findings in the previous report. Satisfactory resolution of both items is planned, but is awaiting final action by the project's new director.

First, RMIN is using the new grantee's state accounting system and is required to use guidelines established by the New Mexico State Department of Finance and Administration. RMIN had not yet developed its own financial management procedures manual to supplement the state system as recommended to the Arizona-based grantee. Second, RMIN was not properly recording advanced payments to two state host agencies--the State of Montana, Law Enforcement Services Division; and the State of Nevada, Division of Investigation. Appropriate accounts had been established to account for the advances, but they had not been completely implemented by the state host agencies involved.

PROJECT SERVICES

RMIN's primary service is to operate an information-sharing system to assist members in investigative analysis. Secondary services, designed to support the primary objective of the information-sharing system and interjurisdictional investigations, include providing members with investigative support (confidential funds), analytical services, specialized investigative equipment, training, telecommunications services, and technical assistance (field staff). The following sections describe these secondary services and how they contribute to the primary program objectives.

Investigative support

RMIN currently operates an investigative support component which provides financial assistance to participating agencies for their conduct of multijurisdictional investigations. The use of the financial resources are limited to the purchase of information and/or contraband; payment of confidential investigative expenses and/or services of nonfederal undercover officers and/or informants; and the purchase of specific informant information. This service is available to all member agencies, and all requests for confidential funds must be made in writing.

The RMIN policies and procedures that govern the use of confidential funds generally comply with OJARS guidelines. These funds should only be authorized when the particular merit of a case warrants the expenditure of these funds, to support multijurisdictional investigations, where the user agency agrees that information obtained will be furnished to the project, and when no other source of funds exists.

In 1983, RMIN made 14 confidential fund awards to member agencies. All of these confidential fund transactions generally complied with policies and procedures, with two minor exceptions. First, RMIN authorized and expended $382 in confidential funds to send a member agency official to a training seminar. Project officials agreed to correct this error by adjusting entries to the confidential fund and training accounts. Secondly, 4 of the 14 cases lacked proper or complete documentation to show that funds were not available from other sources. RMIN officials plan to correct this by scrutinizing requests in a more thorough manner and requiring explicit documentation.

A total of 10 individual member agencies used these funds for the following purposes:

	Amounts
Purchase of information	$ 80.00
Investigative expenses	2,604.39
Purchase of evidence	24,326.06
Flash rolls	60,020.90
Other expenses:	
Equipment rental	500.00
Training seminar	382.42
Total	$87,913.77

However, $60,000 in flash roll funds were returned to RMIN and all or a portion of funds in three other cases were also returned for a total of $63,890. The actual amount of confidential funds expended or outstanding at the end of 1983 was $24,023.77.

In all cases, RMIN received submissions of information that were directly linked to the use of the confidential funds. RMIN received 19 separate submissions of information from member agencies using these funds.

Analytical services

RMIN also provides analytical services to member agencies, including telephone toll, financial data, and criminal activities analyses. Requests by member agencies for analytical services must be in writing and must indicate the involvement of identified, specific types of criminal activity and must identify participants from more than one jurisdiction. RMIN delivered 50 analytical products to member agencies in 1983, including 39 telephone toll analyses, 1 financial data analysis, and 10 link analyses.

Specialized investigative equipment

RMIN maintains a pool of 187 special investigative equipment items for loan to participating member agencies. RMIN's policies and procedures are more comprehensive than federal requirements in that specialized equipment must be used in multijurisdictional investigations and data from the investigation must be contributed to the information system. Any equipment to be used for electronic surveillance will not be loaned without a copy of the court order permitting such use, and the requestor must have a security card on file at RMIN.

RMIN made 26 equipment loans in 1983, and all were in general compliance with RMIN's policies and procedures. However, 9 of the 26 equipment requests lacked documentation that investigations were multijurisdictional. RMIN staff subsequently verified that seven were multijurisdictional. The two cases that

lacked documentation were loans of pieces of equipment borrowed from area law enforcement agencies. RMIN plans to follow the same policies and procedures when lending borrowed equipment to member agencies and will formalize its review process to ensure adequate documentation and uniformity.

Member agencies must also submit a status report after completing an investigation that used RMIN equipment. Although 17 of the 26 investigations had been completed, RMIN had received 5 of the 17 status reports. RMIN plans to conduct more follow-up on completed transactions in 1984 and is currently sending out letters to member agencies to return completed status reports.

A total of 22 member agencies used the equipment service in 1983. Member agencies utilized the 187 loanable items 6.3 percent of the time in 1983. The percentage of time each equipment type was in use is as follows:

Equipment category	Number of items	Percentage of use in 1983
Communication	108	4.0
Surveillance	20	9.6
Photographic	48	.1
Electronic intercept	11	44.8

Training

RMIN maintains a training component to upgrade investigative skills of personnel from participating member agencies. The training assistance may consist of financial support to send personnel to training courses, seminars, and conferences or for the design and delivery of special training courses by RMIN staff. RMIN sponsored three investigative technique seminars in 1983 which were attended by 25 member agencies.

RMIN has no established criteria for member agencies to participate in training seminars, but plans to develop a set of internal guidelines for member agencies using the training service. More documentation from member agencies attending seminars will also be gathered in future sessions in order to evaluate the impact of courses.

Telecommunications services

RMIN currently operates a toll-free telephone line with patch capabilities. Representatives of member agencies are authorized to use the patch system if they have a security card on file at RMIN.

In 1983, RMIN maintained a log book to account for all of the patch calls that went through the system. RMIN also allowed

its own personnel, including field representatives and board members, to use the patch system. A review of the log book revealed that RMIN processed 601 patch calls in 1983.

A total of 19 member agencies used the patch call service in 1983. These agencies placed 536 patch calls, with one agency dominating the service by making 408 calls.

Since 1983, RMIN has developed a set of internal controls governing patch call usage. These new procedures require member agencies to specify one of the following: (1) the call is in direct support of RMIN's information sharing component; (2) the call is in direct support of RMIN's analytical component; or (3) the call is in conjunction with RMIN-supported investigations (a case number has been assigned or it is multijurisdictional in nature).

Technical assistance

RMIN maintains a cadre of state coordinators (field representatives) to provide technical assistance to member agencies. Their primary function is to act as a liaison to member agencies. RMIN's policies and procedures spell out the specific support activities that can be rendered by the state coordinators, including:

--dissemination of information collected by member agencies to other agencies on request;

--provision of fixed site technical assistance and equipment to member agencies;

--consultation and advice to member agencies in the completion of required reports and evaluations;

--recruitment of new member agencies and liaison with existing members; and

--provision of training to law enforcement and prosecutorial agencies in project related law enforcement practices and techniques.

RMIN's policies prohibit the involvement of state coordinators in operations or investigative functions normally associated with the duties of a sworn law enforcement officer, as outlined in federal guidelines.

RMIN and the state host agencies share management responsibilities of field staff, and RMIN plans to increase its direct control over its state coordinators by revising its contracts with host agencies. RMIN also plans to conduct on-site inspections of its field staff in 1984.

RMIN believes that its field staff provides the project with a vital link to member agencies that promotes the use of project services.

Through the end of 1983, state coordinators spent a good portion of their time recruiting new members for RMIN. However, recruiting contacts are not reflected separately in RMIN reports. RMIN reported that field representatives made 2,086 member contacts in 1983 and attended 72 meetings.

GRANT MONITORING AND EVALUATION

The RMIN project is monitored from the federal side by the Department of Justice's RISS program manager at OJARS. The program manager visited RMIN on three occasions in 1983. He attended the Executive Board meetings held in Albuquerque, New Mexico, in May and December and also visited the RMIN project site in September to meet with state coordinators.

The state of New Mexico requires state agencies to obtain annual audits. RMIN is considered a part of the state of New Mexico's Attorney General's Office (the grantee) and is included in the audit for that agency. A private Certified Public Accounting firm is obtained by the Attorney General's Office to conduct the audit. RMIN was included in the annual audit of the Attorney General's Office in 1983 and will also be included in the same audit in 1984.

REGIONAL ORGANIZED CRIME INFORMATION CENTER

ROCIC's program objective is to provide a regional intelligence tracking system that will provide member law enforcement agencies with information and services that will result in the apprehension of organized traveling criminals operating throughout the Southeast United States.

In November 1973, ROCIC became a nonprofit corporation in the state of Mississippi. The first federal funding for ROCIC was an LEAA grant to the state of Mississippi's Attorney General's Office in September 1974. In January 1975, ROCIC moved its headquarters to Jefferson Parish, Louisiana, and the Sheriff of Jefferson Parish became the grantee. In July 1978, ROCIC relocated to Memphis, Tennessee, and the City of Memphis became the grantee. The North Carolina Department of Justice became the grantee in March 1980 even though the ROCIC was still located in Memphis, Tennessee. ROCIC relocated to Nashville, Tennessee, on September 1, 1983, and the grantee is currently the Metropolitan Government of Nashville, Davidson County, Tennessee.

The current ROCIC grant is for $4,082,122 and is for the budget period of December 1982 through December 1984. ROCIC serves a 14-state area: Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Oklahoma, South Carolina, Tennessee, Texas, Virginia, and West Virginia.

As a nonprofit corporation, ROCIC is controlled by its Executive Board. This Board has seven members made up of the ROCIC center director and six law enforcement personnel elected by a majority vote of member agencies. The Executive Board appoints a review committee that is made up of at least one representative from each state in which there is an ROCIC member. The review committee can suspend member agencies for:

--acts detrimental to the ROCIC or the law enforcement profession and

--improper or indiscreet handling of ROCIC information.

The review committee also reviews and make recommendations on applications for ROCIC membership.

ROCIC has 31 employees, 24 of whom work in the center headquarters office and 7 of whom are field representatives. The center staff can generally be grouped into the following functions: nine administrative, seven analysis, five automatic data processing, and three telephone operations.

The Metropolitan Government of Nashville, Davidson County, Tennessee, is the official grantee for the project but delegates the project management to the Executive Board. A staff monitor

attends Board meetings and reviews DOJ grant management reports on ROCIC.

The ROCIC constitution and by-laws explained that ROCIC would be composed of law enforcement officers of proven integrity and ability, representing agencies which maintain a dedicated interest in combating crime. In 1983 ROCIC had 164 members. Project procedures require that potential members be sponsored by current members, reviewed by a field representative and the executive committee, and voted on by the membership at large.

JUSTICE MANAGEMENT DIVISION AUDIT RESOLUTION

The audit staff in the Justice Management Division made a financial and compliance audit of ROCIC activities for the period May 1, 1980, through March 25, 1981. This audit included work at ROCIC headquarters in Memphis, Tennessee; at the grantee, the North Carolina Attorney General's Office in Raleigh, North Carolina; and at 12 federal, state, or local law enforcement agencies. The audit report was issued in March 1982.

Justice's audit report contained 34 separate recommendations that required corrective actions by OJARS or ROCIC. These recommendations were summarized in the following four categories:

(1) Apparent field staff participation in investigations through direct contact with informants was questioned, since a grant condition at the time prohibited personnel that were not sworn police officers from bearing firearms while in the performance of ROCIC activities, participating in investigative activities or surveillance, or briefing or debriefing informants. Justice's audit report said the lack of adherence to established controls increased the potential for improper actions on the part of unsworn ROCIC personnel. Since the audit report, restrictions on staff activities have been incorporated into program guidelines and agency procedures. We reviewed field staff activity reports from January to October 1983 and found no evidence of prohibited activities being performed.

(2) Controls over confidential funds were inadequate. The audit report said that payments to informants were not witnessed and that transactions were not documented. Justice's report also said the ROCIC guidelines needed to be evaluated and that the results obtained from confidential expenditures should also be evaluated. Our review of a random sample of 1983 confidential fund transactions found that problems noted in the earlier audit have basically been corrected.

(3) ROCIC's financial controls were inadequate. The Justice audit report said ROCIC had weaknesses in (a) procedures for reimbursement for gasoline purchases, (b) travel voucher review procedures, (c) paying for expenditures from one budget period with funds from another budget period, and (d) controls over the $150 petty cash fund. We found that ROCIC had made substantial improvements in all these areas. For example, the ROCIC no longer has a petty cash fund, and gasoline purchases are controlled by employees using credit cards in the name of ROCIC. Use of vehicles is monitored closely, and travel reimbursement systems are in place. We suggested and the project agreed to clarify policy regarding per diem when field staff were on travel status for only a portion of the day. We found no weaknesses in ROCIC's vehicle use monitoring procedures or gasoline purchase controls.

(4) Indirect costs, according to the Justice audit, were excessive. As a result, funds were expended for administrative purposes that could have been used to perform operational objectives. This issue was resolved between OJARS and the Justice Management Division audit staff with a renegotiated overhead rate with the new grantee organization. Since the grantee must be a public agency under RISS program guidelines, ROCIC cannot directly receive the grant. Overhead is paid to the grantee for general cost of sponsorship and oversight.

PROJECT SERVICES

ROCIC provides a number of services intended to meet its primary objective of providing a regional intelligence tracking system that will provide member law enforcement agencies with information and services needed to apprehend traveling criminals and narcotics criminals. In addition to the basic information sharing data base and analytical services, ROCIC also provides secondary services in investigative support (confidential funds), specialized investigative equipment, training, telecommunications services, and technical assistance. The following sections describe each of these secondary services and how they contribute to the primary program objectives.

Investigative support

ROCIC provides investigative support funds to member agencies to purchase specific information, evidence, and certain services or as a flash roll where large sums of money are needed for show. During calendar year 1983, ROCIC expended $83,285 on confidential funds and disbursed more than $300,000 for flash rolls, which were subsequently returned.

ROCIC has established written procedures for the disbursement of confidential funds that incorporate federal guidelines. These procedures require that the merits of the case warrant expenditures, that the case be multijurisdictional, that the

information will be added to the ROCIC data base, and that no other source of funds is available. To ensure that these guidelines are met, ROCIC requires that member agencies obtain their ROCIC field representative's approval of requests. All disbursements of more than $500 must then be approved by the ROCIC director, and disbursements of more than $5,000 must be approved by the ROCIC Executive Board. ROCIC also requires that actual transactions for purchase of evidence or information be witnessed by two people.

We randomly selected 20 of 154 confidential fund expenditures made in 1983 and found that ROCIC generally follows its confidential fund guidelines. Signature cards were on file for all but one of the cases we reviewed, and each case documentation contained the required witness signatures.

Confidential fund expenditures are intended to assist member agencies in the conduct of multijurisdictional cases ultimately resulting in arrests and input to the ROCIC data base. ROCIC procedures in effect during calendar year 1983 did not ensure that information was added to the data base. However, ROCIC now requires all users of funds to submit crime impact reports and has established procedures to ensure that this information, where applicable, is added to the data base.

Specialized investigative equipment

ROCIC has 115 pieces of equipment costing $347,722, available to lend to member agencies. We categorized the equipment as follows: communications, vehicles, surveillance, photographic, and other. Some examples of the equipment items available are binoculars, 35mm cameras, suitcase radios, and vans equipped for surveillance. These items are usually lent to the member agencies for a 2-week period.

ROCIC criteria for member agency use of equipment specify that the equipment be available to assist member agencies in criminal investigations provided the cases meet the following conditions:

--The case involves multijurisdictional investigations in which two or more agencies are actively involved.

--The requesting agency agrees that information obtained as a result of the investigation will be furnished to the center for entry into the data base.

--The equipment is available from no other source.

ROCIC encourages the member agencies to request investigative equipment items through their ROCIC field representative, but authorized agency representatives may contact ROCIC directly

to request equipment. The ROCIC equipment manager uses a computer terminal to track equipment, update the inventory, and maintain records on equipment use.

At the time equipment is sent to a member agency, an equipment loan agreement form is enclosed that the member is requested to sign and return to ROCIC. This loan agreement lists the items being lent and ROCIC's loan procedures. Member agencies are requested to return a crime impact report after the equipment is returned to ROCIC. The crime impact report explains the ROCIC service used, case type, names of persons arrested, case disposition, and participating agencies.

The crime impact reports are the primary input documents to the ROCIC information data base on organized traveling criminals. Crime impact reports, generated by members who have used ROCIC equipment, are received by the ROCIC equipment manager and then sent to ROCIC analysts. The analysts decide if the information should be entered into the ROCIC data base.

During calendar year 1983, 78 of the 164 member agencies used the investigative equipment a total of 388 times. Individual agency use ranged from 1 to 25 uses. The five categories of equipment were in use an average of 58 percent of the time.

We reviewed a random selection of 25 of 388 equipment loans to determine if procedures were followed. In 12, or 48 percent of the loans, crime impact reports had been returned, showing that 44 arrests were made. The ROCIC Director said he plans to establish a system that will ensure that ROCIC field representatives contact members to encourage them to submit crime impact reports when ROCIC services are used in a case. Equipment loan agreements were on file for 23 of 25 loans in the sample.

Training

ROCIC provided training to its members primarily through the tri-annual ROCIC conferences and area training conferences or seminars. At the conferences, member agencies are asked to provide information regarding recently identified major travelling criminals, methods of operation, and new crime fighting equipment or techniques. Area training sessions are provided to member agencies in various locations within the region, concentrating on solving specific problems relating to current criminal activities within the area. During calendar year 1983, ROCIC held three conferences and three area training sessions.

The crimes discussed at these three area training conferences all involved more than one state and involved multijurisdictional investigations. For example, one conference involved an auto theft ring operating in at least four states. Information provided during these three area training conferences, according to ROCIC's Assistant Director for Internal Operations,

was added to ROCIC's information data base. An average of 193 people attended three ROCIC conferences, and three area sessions averaged 42 attendees.

Telecommunications services

Each member agency has designated individuals who may make WATS calls through ROCIC. These individuals submit security cards--including basic information on the individual and seven personal information items--which the ROCIC telecommunications operators keep on file. Each caller must identify himself/herself and be able to answer a question the operator takes from the security card before the call will be patched through. ROCIC does not question the need for the call nor does it monitor any of the calls.

ROCIC recently instituted a procedure whereby field representatives, on the basis of computer listings showing the number of phone calls made by individual member agencies, follow up on member use of the WATS line to determine what information was developed. ROCIC believes this procedure will make members more aware of the need to restrict such calls to specific cases and will result in more data input to the ROCIC data base.

We reviewed individual security cards and observed telecommunications operators and found the actual procedures consistent with those described by ROCIC's written guidelines.

The ROCIC Director said he believes telecommunications is one of the most important services ROCIC provides to its members. According to the Director, telecommunications encourages enforcement personnel from different agencies to communicate, resulting in more arrests and subsequently more data for the ROCIC data base. The Director noted the need to ensure that the telecommunications service is used only when necessary and that information developed is actually added to the ROCIC data base. He said the procedure requiring field agents to follow up on the telecommunications use should improve both of these areas.

Technical assistance

At the end of calendar year 1983, ROCIC had filled 7 of its 10 technical assistance field representative positions. The 7 field representatives serve agencies in all 14 states with ROCIC members.

The primary duty of the field representative is to provide liaison services between the ROCIC and member agencies and generally represent ROCIC in an assigned geographical area. Some of the specific responsibilities are related to keeping member organizations informed of the ROCIC services available and to assist members in the accumulation and dissemination of information. Field representatives also provide technical

assistance, such as providing training to member personnel in the use of investigative equipment on loan from ROCIC. In addition, field representatives also provide training or consultation on law enforcement practices and techniques. The field representatives are also responsible for recruiting new member agencies and providing liaison between member and non-member agencies.

The ROCIC policy incorporates the authorized and prohibited activities listed in federal guidelines. The Assistant Director for External Operations is primarily responsible for monitoring the activities of field representatives through daily logs, weekly travel vouchers, and member agency feedback.

We reviewed nine field representative daily activity reports for the week of September 18 through the 23, 1983, to determine if field representatives were engaged in prohibited activities. The activities described in these reports were within the field representatives' prescribed duties.

We also reviewed the field representatives' travel vouchers for the week of May 29 through June 4, 1983, and found that the vouchers were properly documented with receipts and the calculations were correct. We also discussed ROCIC's travel voucher review procedures which included reviews by the Assistant Director for External Operations, the accountant, and controller. We found no weaknesses in these review procedures.

GRANT MONITORING AND EVALUATION

Two Department of Justice organizations reviewed ROCIC during 1983--the OJARS project manager in January and the Intelligence System Policies Review Board in November. In addition to these reviews, ROCIC is also monitored by the Metropolitan Government of Nashville and Davidson County. This oversight has been limited, consisting of one individual's participation in Executive Board meetings, tri-annual membership conferences and reviews of Department of Justice grant management reports. Both the grantee monitor and project director agreed that regular financial audits would benefit the project, and they plan to provide for annual audits in the future.

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