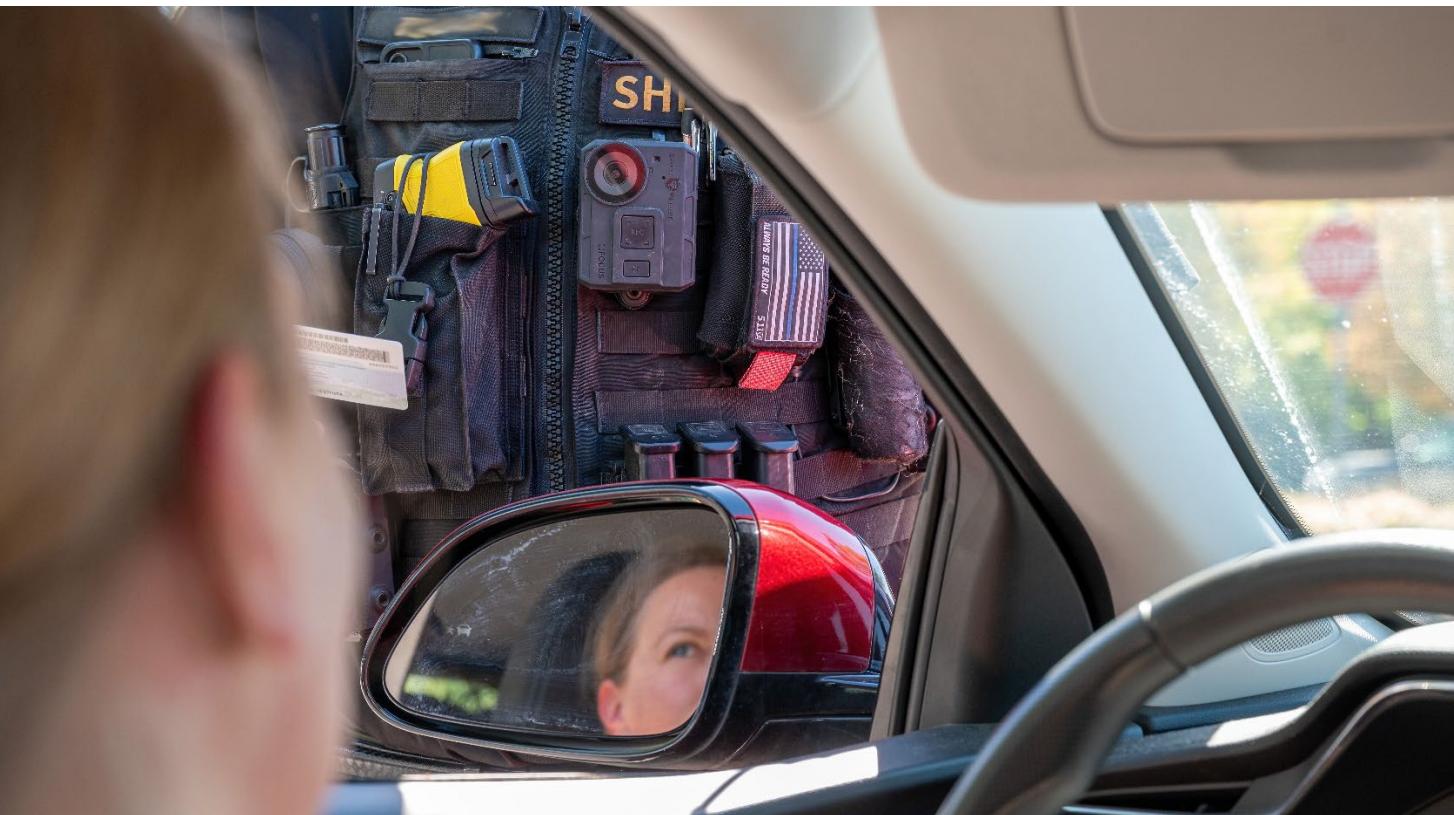




OFFICE OF
INTERNAL AUDIT

Audit Report

Body-Worn and In-Car Camera Program: Foundations in Place, Improved Oversight and Reporting Needed



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Highlights:

Why this audit was performed:

Body-worn cameras enhance accountability, safeguard deputies by supplying context for use-of-force, and lead to more reliable evidence. However, their effectiveness depends on adherence to policies.

Recommendations for the Sheriff's Office:

Publish reports about the program

Create a process to monitor sergeant review

Implement a new system to track record requests

Design information system procedures

Develop reports to improve oversight

Body Worn Camera Program: Foundations in Place, Improved Oversight and Reporting Needed

The objective of the audit was to determine whether the body and in-car camera program supports accountability, transparency, and the secure, effective use of recorded footage.

What was found:

The Deschutes County Sheriff's Office's body camera program had a solid foundation but needed to enhance transparency. The program was relatively new, and staff were continuing to evaluate and implement lessons learned as they arose. The audit uncovered limited accountability for supervisor monitoring and report availability. By improving information system reporting capabilities and addressing challenges in public records tracking and information security, the Sheriff's Office can increase community trust and operational effectiveness.

Due to a scope limitation, auditors could not verify whether deputies consistently recorded and categorized footage in line with policy which is crucial for the program to meet accountability and operational goals.

1. Introduction

Body-worn and in-car cameras enhance transparency and accountability, safeguard deputies by supplying context when use-of-force is necessary, and lead to more reliable evidence when used in a courtroom. Prosecutors, members of the public, and even the deputies themselves comment on the value cameras add to law enforcement encounters. However, their effectiveness depends on whether deputies and the Sheriff's Office adhere to relevant laws, policies, and best practices.

The Deschutes County Audit Committee authorized a review of body and in-car cameras in the Internal Audit Work Plan for Fiscal Years 2024 and 2025. Audit objectives, scope, and methodology can be found in Appendix A.

Background

The Deschutes County Sheriff's Office started using body cameras in May 2021. Each deputy is assigned a camera to wear and an in-dash car camera. In-car cameras are automatically activated by turning on flashing lights, but deputies must actively turn on body cameras. According to Deschutes County Sheriff's Office policy, the objectives for using body-worn and in-car cameras include:

1. Enhancing the public trust by preserving factual representations of deputy interactions with the community in the form of video and audio recordings
2. Promoting deputy safety
3. Recording certain activities and creating a visual and audio record to supplement a deputy's report
4. Enhancing the deputy's ability to document and review statements and actions for accuracy and consistency for both internal reporting requirements and courtroom preparation and presentation

5. Preserving visual and audio information for use in current and future investigations
6. Providing an impartial measurement for self-critique and field evaluation during deputy training

Deputies are required to use body cameras to record most interactions with the public. However, they may use discretion not to record in some cases such as when they:

- are in places with reasonable expectations of privacy (medical facility or locker room)
- determine the need to respect an individual's privacy outweighs the need to record an event
- are conducting advocacy calls or child interviews

They are not allowed to record in a school environment unless a criminal investigation is taking place.

The Sheriff's Office contracted with Coban to provide hardware, software, and information technology maintenance for the program. Footage and data were stored on site and accessed through software provided by Coban. Deputies needed to dock their cameras on site to upload body camera footage, but car camera footage uploaded automatically through Sheriff's Office Wi-Fi. Policy required deputies to upload body camera at least once during each shift.

According to internal reports, as of March 2025, the Office issued 106 cameras to staff, though 44 used them infrequently because they were assigned to specialty, supervisory, or administrative duties. There were 18,866 recordings captured during the January-March 2025 period with 2,191 categorized as evidence or associated with potential civil claims. Between 2021 and Summer 2025, the Office spent nearly \$1 million on the body and in-car camera program.

At the time of the audit, the body camera program was less than five years old, and staff were still actively engaged in evaluation and continuous improvement. For example, the body and auto-

camera policy was updated in March 2025 during the audit period. Additionally, the Sheriff's Office was considering whether to use a new vendor for the program. Selection depended on the quality of services and value of the price offered.

2. Findings

The objective of the audit was to determine whether the body and in-car camera program supports accountability, transparency, and the secure, effective use of recorded footage. Subobjectives included determining whether:

1. Deputies properly recorded and categorized interactions
2. Staff shared reporting about program outcomes with stakeholders
3. Supervisors reviewed deputy recordings
4. Staff appropriately and promptly responded to public record requests
5. Footage was secure: It was reliable and available, and privacy was protected

The Deschutes County Sheriff's Office's body and in-car camera program had a solid foundation but needed to enhance transparency. The program was relatively new, and staff were continuing to evaluate and implement lessons learned as they arose. The audit uncovered limited accountability for supervisor monitoring and report availability. By improving information system reporting capabilities and addressing challenges in public records tracking and information security, the Sheriff's Office can increase community trust and operational effectiveness.

Due to a scope limitation, we could not verify whether deputies consistently recorded and categorized footage in line with policy which is crucial for the program to meet accountability and operational goals.

Scope Impairment

The County Internal Auditor could not draw conclusions related to whether interactions were properly recorded and categorized

Objectives for the Sheriff's camera program include "enhancing the public trust by preserving factual representations of deputy interactions with the community in the form of video and audio recordings" and "Promoting deputy safety." Given the importance of these objectives, it is vital to ensure deputies use cameras appropriately and classify recordings correctly.

During the initial risk assessment phase of the audit, risks related to how deputies implemented the program became prominent due to the program's reliance on deputies who have sole discretion to start, stop, and categorize body camera recordings. We reviewed reports from policy research organizations, interviewed staff and community members, and reviewed audit methodology for body camera audits conducted by other local governments across the country. We identified risks related to staff potentially not turning on or blocking cameras in violation of policy as well as a risk of staff improperly categorizing videos resulting in early deletion.

The first objective for this audit addressed these risks. Planned methodology included developing a sample of dispatch incidents and reviewing footage to determine whether:

- Deputies appropriately started and ended recordings, provided required notice, explained unrecorded periods, applied the correct category to footage, and uploaded footage in a timely manner
- Equipment was working properly including successful audio and video recording with a pre-recording buffer

When initially discussing audit objectives, Sheriff's Office staff were open to providing access to footage, but said they were waiting for guidance from the District Attorney about whether

auditors should have access to evidence related to open cases. The meeting to discuss audit objectives took place in the Spring of 2025 prior to a leadership transition during which both the Sheriff and command staff were replaced. Sheriff's Office staff at the time and the auditor reviewed the language in Oregon Revised Statute 133.741, the state law related to body camera programs. We agreed to research whether the law supported auditor access to footage.

Based on this conversation, auditors began conducting fieldwork related to the other audit objectives and waited for a response from the Sheriff's Office about access to footage.

Ultimately, Sheriff's Office staff did not provide access to body camera footage citing County Legal advice that review by an internal auditor does not qualify as a legitimate law enforcement purpose under Oregon Revised Statute. Sheriff's Office staff explained "While there is not one specific statute or case that defines legitimate law enforcement purpose, statutory / regulatory / case law interpretation reveals that there must be a direct connection to the investigation, detection, or prosecution of criminal activity. Routine administrative functions, such as a general audit, do not meet this purpose. If the audit was for the purpose of uncovering criminal activity that would satisfy the requirement of criminal justice purpose / legitimate law enforcement purpose." The Office did not provide supporting documentation for this statement such as a memo outlining supporting statutes, regulations, and case law.

Staff proposed working with the auditor to develop a checklist Sheriff's Office staff could use to review a sample of footage and report results to the auditor without permitting access to the actual footage. However, this solution did not allow for independent evidence verification required by auditing standards.

Without access to body and in-car camera footage, the County Internal Auditor could not draw conclusions about whether Sheriff's Office deputies appropriately recorded incidents and categorized recordings.

Findings

Camera reporting was not published, replicable, or evaluative

As stated in the scope impairment section, there is a risk deputies could fail to start, stop, and categorize body camera recordings according to policy. Gathering statistics about body-worn and in-car camera use and compliance helps the Office to check how well the program is working and whether there are areas for improvement. Sharing this information with the public builds trust and openness in the community. The Sheriff's Office spent nearly \$1 million on the camera program between its inception in May 2021 and the Summer of 2025. Taxpayers deserve to understand the investment's benefits.

The Police Executive Research Forum suggests publishing statistics about camera use at various specified points throughout the year or as part of the agency's year-end report. Statistics could include information such as how often footage is used in criminal prosecution or internal investigations.

Sheriff's Office policy requires quarterly internal reporting on the body and in-car camera program. Each quarter, Sheriff's Office staff review footage and statistics to produce an internal report on the program. Staff select recordings from a single patrol team to review on a rotating basis. They randomly select two or three recordings for each member of the team, aiming for a variety of circumstances (day/night, incident type, in-car and body for same incident). They review the sample for compliance with policy including how soon deputies activated the camera, whether they provided notification about the recording, and how they communicated with members of the public.

After the review, staff produce a quarterly report that includes a count of:

- users those who were issued a camera but did not use it
- all recordings with a sub-count of recordings that were classified as evidence or saved for potential internal investigations
- dispatches
- public records requests for footage

These reports were a good first step, but they did not provide for trust and transparency with the community. The reports:

- Were not published. The reports were issued to a Sheriff's Office captain but are not publicly available.
- Were not evaluative. They included descriptive statistics about the program, but not information that would help managers evaluate effectiveness or develop areas for improvement.
- Were not replicable. The numbers in reports were based on point in time reporting from the information system and staff did not save documents as evidence.
- Did not include methods for determining instances where a deputy did not turn on a camera. To account for cases where a deputy may not have turned on a camera, staff would need to look for footage from a sample of dispatches. Staff said they would investigate ways to include this methodology in future reviews.

Sheriff's Office staff said that accreditation standards did not require reporting and that they were not aware of any other west coast law enforcement agencies that published body and auto camera statistics. Auditors found only one example, a report on surveillance technology from San Diego. Regardless of whether accreditation standards require it or how common it is, publishing statistics on the body and auto camera program would promote trust and transparency with the community. It would also offer justification for the monetary investment the Office has already

made and any increases that might be associated with a new vendor. Staff were already collecting data on a quarterly basis. Incorporating it into existing reports or publishing the data on the website should not take too many additional resources.

To increase transparency and accountability related to camera program reporting, Sheriff's Office staff should

- 1. Save copies of point-in-time reports used during camera program reviews to document evidence used.***
- 2. Publish results of camera program reviews so information is available to the public.***
- 3. Include a review of dispatched calls in camera program reporting methodology.***

Supervisors were not consistently reviewing footage according to policy

In addition to quarterly monitoring and reporting, supervisor review is another way to ensure that deputies start, stop, and categorize body camera recordings according to policy. This requirement was added to the policy in March 2025.

The Sheriff's Office body camera recording policy requires that supervising sergeants review two randomly selected recordings for each direct report each quarter. However, the Office did not have formal processes in place to ensure these reviews took place. Based on a review of how often sergeants accessed body camera footage, it appears sergeants were not consistently reviewing footage. From July to September 2025, 62 individual deputies uploaded footage. Of those, 26 (42 percent) had fewer than two reviews.

Staff mentioned two reasons why the analysis might show fewer reports than required. Because the requirement for sergeant review was a new addition to the March 2025 update to policy, staff may still have been getting accustomed to conducting

reviews. Another reason raised was that some sergeants ask deputies to login to the system to review footage together. If this was the case, an audit of sergeant system access would not catch the review. A requirement that sergeants document reviews, either in a report or log, would increase confidence that reviews were taking place according to policy.

To facilitate oversight of supervisor compliance with monitoring requirements, Sheriff's Office staff should

4. *Develop a system to document sergeant review of footage.*

Public record requests were fulfilled according to policy, but tracking was incomplete

It is essential staff follow guidelines for providing footage to the public due to the difficulty of balancing competing interests. When footage is provided to the public it adds value to the program by increasing transparency. On the other hand, there are privacy concerns and a risk footage could be used to embarrass people interacting with law enforcement or for entertainment.

Sheriff's Office and County policy create standards for public records request including timelines for response, communication about exempt records, and fee calculation.

Sheriff's Office staff complied with policy and state law when responding to public records requests, but this conclusion would be more reliable with better record keeping.

The Sheriff's Office website includes an online portal for submitting requests. The portal also has some reporting capabilities including the submission time, contact information, information about the incident, and justification for why disclosure is in the public interest.

From May 2024 to April 2025, 55 requests for camera footage came through the portal. Frequency averaged 4.6 requests per month with a peak of seven in October 2024.

A review of a sample of 10 portal requests revealed that of the 10, no footage was released in any instance. The sample included

- Four requests for which the fee was disclosed with no further contact after fee disclosure
- Three requests were related to other agencies (city or state police)
- One request related to an active case and not subject to disclosure
- One request determined to not be related to public interest
- One request from an incident prior to the body camera program

Fees for the sample requests ranged from \$86 to \$2,315 and depended on footage length and how many deputies were involved in the incident. Costs were based on the number of files involved in a request and the cost for information technology staff to review footage and redact faces and identifying information. Fee calculation depended on staff hourly wages and the Board of County Commissioners approved the methodology in the Fiscal Year 2026 fee schedule. Staff estimated that it took about an hour to review and redact 10 minutes of footage.

When considering competing interests for providing public access to footage, Oregon law leans heavily into protecting privacy. State law mandates that footage released through the public record request process must be edited to obscure all identifiable faces before release. In the sample examined, the cost of redacting identifiable images often led to no footage being shared through public requests.

The state public record advocate noted that this is a widespread issue across the state, with footage rarely provided to the public. In contrast, other states may not prioritize privacy, allowing body

camera footage to be commercialized for entertainment purposes. Numerous social media channels feature body camera footage depicting high-stress, traumatic, and embarrassing interactions with law enforcement. However, auditor web searches indicated these channels did not include footage from Deschutes County. Protecting privacy is an admirable outcome, but it also means access is highly restricted for a program meant to improve transparency.

In addition to using the portal, members of the public can also submit paper requests for camera footage. Others start out as requests for Case Reports but then later extend to body camera footage without going through the portal. The Sheriff's Office didn't have a system in place to comprehensively track requests outside of the portal but was planning to purchase new software to centralize and improve the request tracking process.

To improve public record request monitoring and reporting, the Sheriff's Office should

5. *Continue with plans to implement new software to track public records requests.*

Information security controls fell short

Information security controls are essential for ensuring privacy is protected and data, including camera footage, is reliable and available.

Federal and state government requirements for criminal justice information systems include controls to limit system access, identify users, and maintain inventory.

Controls in the body and in-car camera information system fell short in areas including password requirements, session lockouts, account set-up, temporary access, and inventory control. User roles were established but there was no monitoring to ensure they were properly deployed.

The Office would be better equipped to proactively comply with information system controls if they documented necessary components in a policies and procedures manual specific to the camera information system. Federal and state guidelines for criminal justice information systems require policies and procedures for each policy area including access control, identification and authorization, and configuration management. Guidelines note staff should use a risk management strategy to inform policies and procedures; and policies and procedures should not be a simple restatement of controls.

Additionally, staff were unable to monitor user roles and access because the system did not have reports available.

To ensure camera footage is reliable and available, Sheriff's Office staff should

- 6. *Develop policies and procedures for the camera footage information system.***
- 7. *Develop and use reports that allow for user role and access monitoring.***

3. Conclusion

The audit objective was to determine whether the body and in-car camera program supports accountability, transparency, and the secure, effective use of recorded footage.

We were unable to draw conclusions about whether deputies properly recorded and categorized interactions, leaving a significant gap in understanding how well the program functions.

Otherwise, we found the Deschutes County Sheriff's Office established the foundations of a body camera program but faced challenges in enhancing oversight and transparency. Staff demonstrated some commitment to oversight, as evidenced by quarterly internal reports, but management did not track

supervisor monitoring and did not publish reports, lessening the opportunity for building public trust.

Efforts were underway to improve public records request tracking and to add a new analysis to the quarterly reporting process. By advancing these initiatives and collaborating with the current or future vendor to enhance reporting capabilities, the Sheriff's Office can strengthen the program's transparency and accountability, aligning more closely with community expectations and legal requirements.

Sheriff's Office staff should:

1. Save copies of point-in-time reports used during camera program reviews to document evidence used
2. Publish results of camera program reviews so information is available to the public
3. Include a review of dispatched calls in camera program reporting methodology
4. Develop a system to document sergeant review of footage
5. Continue with plans to implement new software to track public records requests
6. Develop policies and procedures for the camera footage information system
7. Develop and use reports that allow for user role and access monitoring

4. Management Response



DESCHUTES COUNTY SHERIFF'S OFFICE

Ty E. Rupert, Sheriff

Proudly Serving Our Community

To: Elizabeth Pape, County Internal Auditor
Date: November 24, 2025
From: Sheriff Ty Rupert, Captain Bryan Husband, Captain Mike Sundberg
Subject: DCSO Management's Response to Body and In-Car Camera Audit Report

Recommendation:

1. Save copies of point-in-time reports used during camera program reviews to document evidence used.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

Deschutes County Sheriff's Office (DCSO) is in the process of transitioning to Lexipol's body worn camera policy which will have different requirements for program reviews. The Sheriff's Office has begun to implement a new review process to document point-in-time reviews which includes a retrievable log report.

c) Estimated date of resolution January of 2026 for deployment of point-in-time reviews or date completed _____.

d) Estimated cost to implement recommendation, if significant \$ NA _____

Recommendation:

2. Publish results of camera program reviews so information is available to the public.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

While the PERF may have been used as a general reference point for program best practices in this audit, DCSO's body worn and in-car camera policy exceeds the standards established and audited by the Northwest Accreditation Alliance as per our membership to the Oregon State Sheriff's Association. We will work towards identifying what statistics could be made public upon request but disagree that this recommendation carries any specific risk or requires us to otherwise publish information. We are not aware of any other agency in Oregon publishing their body camera program statistics.

c) Estimated date of resolution NA or date completed NA.

d) Estimated cost to implement recommendation, if significant \$ NA

Recommendation:

3. Include a review of dispatched calls in camera program reporting methodology.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

DCSO's existing camera systems are not connected to the CAD system, so the review process is highly manual and labor intensive. Currently, at any time, a search can be conducted in our records system to identify calls for service completed by any deputy. As previously mentioned, we are implementing a new review process which will document the call reviewed. Further information about the reviewed call will be accessible at any time in the future. We are in an initial review phase of a possible procurement to upgrade or replace our camera systems which could connect to CAD and make searches easier. The below estimation is based on an initial cost quote from one of our interested vendors.

c) Estimated date of resolution 6/30/2027 or date completed .

d) Estimated cost to implement recommendation, if significant \$ 14,000

Recommendation:

4. Develop a system to document sergeant review of footage.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

DCSO is implementing a new system for sergeants to document the review of their team's footage. DCSO is also evaluating reporting options and new technology options to make the review process more efficient.

c) Estimated date of resolution January of 2026 for deployment or date completed _____.

d) Estimated cost to implement recommendation, if significant \$ NA _____

Recommendation:

5. Continue with plans to implement new software to track public records requests.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

DCSO is currently in the process of contracting with a new vendor to centralize, simplify, and enhance our public reporting process.

c) Estimated date of resolution 06/30/2026 or date completed _____.

d) Estimated cost to implement recommendation, if significant \$ 10,000 _____

Recommendation:

6. Develop policies and procedures for the camera footage information system.

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

DCSO's current body worn camera policy exceeds accreditation standards set forth by Northwest Accreditation Alliance. DCSO is also in the process of adopting Lexipol's nationally recognized law enforcement policies, including their body worn camera policy, which also exceeds accreditation standards.

DCSO is in the process of evaluating a new vendor for our camera systems. If a new vendor is selected, part of the onboarding process will be to review our policies and procedures for state and federal information security compliance.

c) Estimated date of resolution NA or date completed policies and procedures are currently in place.

d) Estimated cost to implement recommendation, if significant \$ NA

Recommendation:

7. Develop and use reports that allow for user role and access monitoring

a) Management position concerning recommendation

Agrees Accepts the Risk Disagrees

b) Comments:

DCSO is in the process of evaluating a new vendor for our body worn and in-car camera systems. Our current system does not have user role auditing reports readily available. Part of our evaluation criteria will be the reporting and auditing capabilities of user roles and access monitoring.

c) Estimated date of resolution 6/30/2027 or date completed _____.

d) Estimated cost to implement recommendation, if significant \$ Unknown

5. Appendix A: Objective, Scope, and Methodology

The County Internal Auditor was created by the [Deschutes County Code](#) as an independent office conducting performance audits to provide information and recommendations for improvement.

Audit Authority

The audit included limited procedures to understand the systems of internal control around the body and in-car camera program. No significant deficiencies were found in this audit. A significant deficiency is defined as an internal control deficiency that could adversely affect the entity's ability to initiate, record, process, and report financial data consistent with the assertions of management in the financial statements. The findings noted were primarily compliance and efficiency matters.

Audit findings result from incidents of non-compliance with stated procedures and/or departures from prudent operation. The findings are, by nature, subjective. The audit disclosed certain policies, procedures and practices that could be improved. The audit was neither designed nor intended to be a detailed study of every relevant system, procedure, or transaction. Accordingly, the opportunities for improvement presented in the report may not be all-inclusive of areas where improvement may be needed and does not replace efforts needed to design an effective system of internal control.

Management has responsibility for the system of internal controls, including monitoring internal controls on an ongoing basis to ensure any weaknesses or non-compliance are promptly identified and corrected. Internal controls provide reasonable but not absolute assurance that an organization's goals and objectives will be achieved.

Objectives and Scope

The objective of the audit was to determine whether the body and in-car camera program supports accountability, transparency, and the secure, effective use of recorded footage. Subobjectives included determining whether:

- Deputies properly recorded and categorized interactions
- Staff shared reporting about program outcomes with stakeholders
- Supervisors adequately monitored deputy recordings
- Staff appropriately and promptly responded to public record requests
- Footage was secure: It was reliable and available, and privacy was protected

The scope included program implementation, record keeping, oversight, and reporting during the Spring and Summer of 2025.

Methodology

Audit procedures included:

- Interviewing staff and interested community members. Staff included those involved in program administration, information technology, public records requests, evidence, training, prosecution, the union, and the public information officer. Community members included members of the former Sheriff's Advisory Committee and the other interested community members.
- Reviewing documents including state law, County and Sheriff's Office policy, and best practices.
- Reviewing information systems reports of footage uploaded and accessed between July and September 2025.

- Reviewing a sample of 10 public records requests from a population of 55 requests from May 2024 to April 2025. Because the sample was random and representative, results can be extrapolated to the population.
- Reviewing user roles, access, and reports in Coban, the information system used for storing and categorizing footage.
- A planned review of a sample of video footage to determine whether deputies appropriately recorded interactions and categorized recordings was not possible because the Sheriff's Office did not provide access.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives.

Some procedures could not be performed because the Sheriff's Office did not provide access to camera footage. As a result, the audit does not include a conclusion related to whether deputies appropriately recorded interactions and categorized footage, provide assurance that the system operates as designed, or offer recommendations to support continuous improvement.

For the other areas of the audit, we believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

(2024 Revision of Government Auditing Standards, issued by the Comptroller General of the United States.)

The mission of the Office of Internal Audit is to improve the performance of Deschutes County government and to provide accountability to residents. We examine and evaluate the effectiveness, efficiency, and equity of operations through an objective, disciplined, and systematic approach.

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