

**Columbus City Schools
Office of Internal Audit**



LED Lighting Upgrade Project - 2019

Regular Audit 2020.AU.15

Report Date: June 25, 2020

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Executive Summary

The Columbus City Schools (CCS) Office of Internal Audit (OIA) completed an audit of a lighting upgrade project conducted by the CCS Office of Buildings and Grounds (B&G) during late Spring through early Fall 2019.

Our audit was conducted in accordance with the *International Standards for the Professional Practice of Internal Auditing* established by the Institute of Internal Auditors. Our audit included such procedures as we deemed necessary to provide reasonable assurance regarding the audit objectives. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. Internal Auditing helps an organization accomplish its objectives through a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

OIA reported seven Issues and 17 Recommendations. OIA rated five Issues as High Risk and two Issues as Moderate Risk. The nature of the Issues included:

- Project needs assessment and planning phase weaknesses.
- No written contracts with service providers awarded public work.
- Noncompliance during the procurement of services.
- Bid evaluation and award phase weaknesses.
- B&G actions related to project fires.
- Exceptions noted with payments to service providers.
- Noncompliance in the performance of services.

OIA appreciates the cooperation and assistance provided by management and staff during the audit.

We noted the following issues during the review:

Risk Ratings, defined:

1 – High/unacceptable risk requiring immediate corrective action;

2 – Moderate/undesirable risk requiring future corrective action;

3 – Low/minor risk that management should assess for potential corrective action.

Issues	Risk Rating		
	1	2	3
Objective 1: Examine the awarding of contracts to installation contractors and an external project manager for compliance with laws, regulations, and CCS policies governing competitive bidding, purchases of services, and awarding of contracts.			
Issue 1 – OIA noted weaknesses relative to the planning phase of the project. Details of the weaknesses are reported in the Issues and Recommendations portion of this report.	X		
Issue 2 – B&G did not initiate or use written contracts with retrofit service providers and construction management service providers. B&G relied on the bid specifications and purchase orders as the governing records for scope of work to be completed.	X		
Issue 3 – OIA noted noncompliance in the procurement of services and materials for the project. Details of the noncompliance are reported in the Issues and Recommendations portion of this report.		X	
Issue 4 – OIA noted weaknesses relative to project bid evaluation and awarding procedures. Details of the weaknesses are reported in the Issues and Recommendations portion of this report.	X		
Objective 2: Examine management actions to monitor the installation contractors and external project manager performance in accordance with awarded contracts.			
No Issues reported			
Objective 3: Examine management actions to remedy retrofitted lights and ensure proper retrofitting of lights subsequent to the initial and subsequent fires which occurred.			
Issue 5 - OIA noted weaknesses related to B&G's actions in response to and surrounding the fire incidents. Details of the weaknesses are reported in the Issues and Recommendations portion of this report.	X		

Issues	Risk Rating		
	1	2	3
Objective 4: Determine whether payments made to installation contractors and external project manager were supported by documentation or evidence the services were performed, the amounts paid were accurate based on Invitations to Bid (ITBs), and that management took steps to determine the work was performed prior to approving payment.			
Issue 6 - OIA noted exceptions and conditions related to payments to contractors for project services. Details of the exceptions are reported in the Issues and Recommendations portion of this report.		X	
Objective 5: Examine documentation supporting compliance with significant provisions of the ITBs, contracts for services with installation contractors and external project manager, and CCS Purchasing Terms and Conditions.			
Issue 7 - B&G did not present evidence to demonstrate retrofit service providers, the project management company, and original lamp supplier complied with certain performance provisions of ITBs and CCS Vendor General Terms and Conditions. Details of the noncompliance are reported in the Issues and Recommendations portion of this report.	X		
Objective 6: Attempt to reconcile the quantity of lights CCS purchased, delivered to CCS, installed by contractors, and any remaining LED light inventory.			
No Issues reported			

Audit Objective

The objectives of the audit were:

- Examine the awarding of contracts to installation contractors and an external project manager for compliance with laws, regulations, and CCS policies governing competitive bidding, purchases of services, and awarding of contracts.
- Examine management actions to monitor the installation contractors and external project manager performance in accordance with awarded contracts.
- Examine management actions to remedy retrofitted lights and ensure proper retrofitting of lights subsequent to the initial and subsequent fires which occurred.
- Determine whether payments made to installation contractors and external project manager were supported by documentation or evidence the services were

performed, the amounts paid were accurate based on ITBs, and that management took steps to determine the work was performed prior to approving payment.

- Examine documentation supporting compliance with significant provisions of the ITBs, contracts for services with installation contractors and external project manager, and CCS Purchasing Terms and Conditions.
- Attempt to reconcile the quantity of lights CCS purchased, delivered to CCS, installed by contractors, and any remaining LED light inventory.

Audit Scope

The audit scope included activities, actions, and financial transactions related to B&G's initiation and completion of a project to upgrade lighting within certain CCS schools and buildings to LED lighting. To encompass the majority of activities, actions, and financial transactions, OIA established the audit period as February 1, 2019 through November 30, 2019. However, OIA also examined relevant activities, actions, and financial transactions outside the stated period which related to the activity within the stated period.

Methodologies

To accomplish our audit objectives, OIA performed the following:

- Inquired with B&G and other relevant CCS personnel.
- Inquired with relevant external parties.
- Examined CCS governance related to procuring goods and services.
- Examined significant relevant documents related to service delivery including, but not limited to, competitive bid records, contracts for services, monitoring reports, inspection reports, grant applications, and fire incident reports.
- Examined significant relevant financial records including, but not limited to, purchase orders, invoices, and checks.
- Reconciled the quantity of LED lights purchased, delivered, installed and remaining at the conclusion of the project.

Background

In the late Spring through early Fall 2019, CCS B&G initiated and conducted a project to upgrade the lighting in certain CCS schools and buildings through the retrofitting of existing light fixtures to light emitting diode (LED) lights. B&G awarded retrofitting services to two service providers through competitive bid using four Invitations to Bid (ITBs). B&G awarded three bids to one service provider and one bid to the other service provider. B&G also awarded project management services and project LED lamp supplies to external vendors through competitive bid processes. During the project the District experienced five fires at five District buildings. B&G attributed the fires to the manner in which installation contractors retrofitted the existing light fixtures. At its meeting on January 23, 2020, the Audit and Accountability Committee approved an amendment to the OIA FY2020 audit plan to include an audit of the LED Lighting Upgrade Project.

The following tables present relevant project financial information comparisons.

Estimated Lamps Bid vs Actual Lamps Installed				
Bid #⁽²⁾	Estimated	Actual	Variance	% Variance
319	14,054	17,639	3,585	26%
321	14,789	17,047	2,258	15%
322	8,193	9,063	870	11%
323	6,778	5,640	(1,138)	(17%)
Totals⁽¹⁾	43,814	49,389	5,575	13%

- (1) Actual Lamps Installed does not include 8,789 lamps installed at four locations not included in the bids awarded to the installation contractors.
 (2) Provider 1 awarded bids 319, 322, and 323; Provider 2 awarded bid 321.

Awarded Bid Costs vs Actual Costs – Bids				
Bid #	Bid	Actual	Variance	% Variance
319	\$110,043	\$130,024	\$19,981	18%
321	174,510	247,121	72,611	42%
322	63,414	70,575	7,161	11%
323	52,462	40,131	(12,331)	(24%)
Totals⁽³⁾	\$400,429	\$487,851	\$87,422	22%

- (3) Actual costs do not include \$27,744 in services provided at one location not included in the bids awarded to the installation contractors.

Awarded Bid Costs vs Actual Costs – Service Providers				
	Bid	Actual	Variance	% Variance
Provider 1⁽⁴⁾	\$225,919	\$240,730	\$14,811	7%
Provider 2	174,510	247,121	72,611	42%
Totals	\$400,429	\$487,851	\$87,422	22%

- (4) Actual costs do not include \$27,744 in services provided at one location not included in the bids awarded to the installation contractor.

Awarded Bid Amount vs Purchase Order Amount				
	Bid Amount	Purchase Order	Variance	% Variance
Provider 1	\$225,919	\$325,000	\$99,081	44%
Provider 2	174,510	250,000	75,490	43%
Totals	\$400,429	\$575,000	\$174,571	44%

Estimated Project Costs vs Actual Project Costs – Category				
	Bid	Actual	Variance	% Variance
Retrofit	\$400,429	\$516,683	\$116,254	29%
Lamps	251,000	306,519	55,519	18%
Project Mgmt	24,360	24,360	0	0%
Totals	\$675,789	\$847,562	\$171,773	25%

B&G obtained external funding and energy rebates totaling \$455,722 to offset approximately 54% of the actual project costs.

LED Lighting Upgrade Project - 2019 – Issues and Recommendations

Issue 1 (2020.AU.15-01) – Project Needs Assessment and Planning Phase Weaknesses. (High)

OIA noted the following weaknesses relative to the planning phase of the project:

- B&G did not require and does not have a project planning and approval process for significant projects undertaken such as the LED lighting upgrade project.
- B&G estimates of lamps to be installed were known to likely be imprecise when scoping the project.
- B&G did not obtain formal written agreements with external sources to enforce commitments to fund the project scope. One of the drivers for the project scope was external funding to significantly defray project costs.

Lack of project planning and approval protocol increased the risk the project was not necessary or financially viable, the project objectives did not align with department business objectives and/or CCS strategic objectives, project outcomes would not be obtained, project outcomes did not align with project objectives, and project objectives would not be achieved effectively and efficiently.

Imprecise lamp estimation methods increased the risk project and competitive bid scopes would not be representative of the likely actual amount of work to be completed and thus not reasonably represent the likely project costs.

Lack of written agreements increased the risk CCS would have to cease the project or increase CCS's funding of the project unexpectedly and have no recourse or remedy should external sources change their commitment.

Recommendations

1. We recommend B&G develop a project evaluation and approval protocol for considering significant department projects such as the 2019 LED lighting upgrade project.
2. We recommend B&G use reasonably precise methods to determine the amount of project work to be completed in order to build reasonable expectations of project and competitive bid scopes representative of the actual scope of work.
3. When relying on external funding sources and commitments for project go-no-go decisions and significant defraying of project costs, we recommend B&G obtain formal written agreements with external parties to memorialize understandings and commitments, and provide remedies should the external funding party change or renege on its commitment.

Management Response:

1. The Office of Buildings & Grounds will research and implement a project management mechanism for tracking major projects.

2. The Office of Buildings & Grounds will develop a reasonably precise method for determining estimated needs of the project scope.
3. The Office of Buildings & Grounds will consult with Legal Services on the best way to formalize agreements with external funding groups.

Process Owner: DeJuan Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021

Issue 2 (2020.AU.15-02) – Lack of Written Contracts With Service Providers. (High)

B&G did not initiate or use written contracts with retrofit service providers and the construction management service provider. B&G relied on the bid specifications and purchase orders as the governing records for scope of work to be completed. Reliance on the purchase order to serve as a contract has been a permitted business practice within the District.

Lack of written contracts increased risk of the inability to legally enforce CCS claims of nonperformance relative to procured services and products leading to increased risk of monetary loss.

Recommendation

4. We recommend CCS Purchasing require and enforce the use of written contracts for procurement of significant services.

Management Response:

4. The purchasing department will work with Legal Services to determine a definition of “significant services” that require a contract for procurement. A process will be developed to monitor the use of contracts for procurement. Purchasing will provide training for departmental managers on the use of contracts for “significant services.”

Process Owner: Annette Morud, Senior Executive Director of Business and Operations

Implementation Date: May 31, 2021

Issue 3 (2020.AU.15-03) – Noncompliance – Procurement of Services. (Moderate)

OIA noted the following noncompliance in the procurement of services and materials for the project:

- Bids were not advertised once each week for not less than two consecutive weeks in a newspaper of general circulation in the District before the specified date of the bid close (ORC 3313.46, CCS Purchasing and Solicitation Guidelines).
- Bids were not sealed and opened in the presence of at least one witness (BOE PO6320). B&G let the ITBs via Public Purchase (publicpurchase.com) on-line platform. The B&G supervisor accessed the bids via the site at his desk with no one else present.
- ITBs did not include reference to the nondiscrimination statement required to be certified to CCS (BOE PO6320; PO6400).
- ITBs did not include the contracting and procurement requirements of CCS's LEDE Statement (BOE PO6320; PO6400).
- B&G did not require and bidders did not provide bid guaranties with their bids (ORC 3313.46; ORC 153.54).
- Bidders did not certify in writing bidder has not directly or indirectly engaged in unlawful discrimination and will not employ or contract with others which the bidder knows or suspects of having done so. (BOE PO6320; PO6400; CCS Standard Terms & Conditions).
- Though the awarded bids were greater than \$25,000, B&G did not require, and awarded bidders did not provide and pay for, a bond covering payment and performance of work. (CCS Standard Terms & Conditions).
- B&G did not require, and selected bidders did not provide, evidence of criminal background checks of employees who would be working on school property. (CCS Standard Terms & Conditions).
- B&G did not require, and selected bidders did not provide, a copy of the Ohio Bureau of Workers Compensation certificate showing the contractor had paid all premiums required by law. (CCS Standard Terms & Conditions).
- B&G did not document the reason for rejected bids and did not make the reasons part of the procurement file. (CCS Purchasing & Solicitation Guidelines).

Unawareness of applicable governance increased the risk of noncompliance with statutes and CCS policies and procedures governing the procurement of services.

Recommendation

5. We recommend all B&G personnel responsible for procuring goods and services be familiar with applicable governance before procuring goods or services and B&G implement procedures to ensure compliance with the stated governance.

Management Response:

5. The Office of Buildings & Grounds will work with the Purchasing Department on training for our staff for procuring goods and services.

Process Owner: DeJuan Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021

Issue 4 (2020.AU.15-04) – Bid Evaluation and Award Phase Weaknesses. (High)

OIA noted the following operational weaknesses relative to project bid evaluation and awarding procedures:

- The B&G supervisor responsible for constructing, evaluating, and awarding bids for project services and materials was not aware of established governance relative to procuring the services and materials for the LED upgrade project.
- B&G generally did not document rationales, communications, consultations, and decisions for selecting or rejecting retrofitting services providers, the project management service provider, and lamp suppliers.
- B&G did no due diligence on either of the retrofit contractors selected as to their qualifications, experience, required certifications/licensing, or capacity to complete the bid work. Prior to these ITBs neither contractor selected had performed work for CCS. The B&G supervisor advised OIA the type of retrofit work required, at a minimum, the oversight of a licensed electrician. OIA research identified only one of the two selected service providers appeared to be a licensed electrician via State of Ohio license look-up.
- B&G did no due diligence on the project management services contractor selected as to qualifications, experience, required certification/licensing, or capacity to complete the bid work. Prior to this project, B&G had used the selected project management contractor on one small job; however, had done no such due diligence at that time either.
- B&G purchased 4,000 lamps totaling \$19,920 from one of the service providers awarded retrofit bid work. B&G charged the purchase to the purchase order B&G let for the retrofit services rather than initiate a separate procurement action.

Lack of governance awareness increased the risk of noncompliance with statutes and CCS policies and procedures governing procurement of goods and services and lead to the noncompliance reported.

Lack of documentation supporting significant evaluations and decisions during the competitive process increased the risk the District would be unable to counter allegations or legal claims of an unfair process and selection.

Lack of due diligence of vendor/service providers increased the risk work would not be completed safely by qualified/licensed providers and it would not be completed in time to meet B&G's deadline to obtain external project funding.

Lack of a separate procurement action for additional lamps increased the risk of fraud, waste, and abuse through the award of public work, purchases did not comply with the District's procurement governance, and public scrutiny of the manner CCS procures goods and services.

Recommendations

6. We recommend all B&G personnel responsible for procuring goods and services be familiar with applicable governance before procuring goods or services.
7. We recommend B&G design and implement standard operating procedures requiring those responsible for constructing, evaluating, and awarding competitively bid purchases to document significant rationales, judgments, and decisions during the process.
8. We recommend B&G conduct and document some level of due diligence of new vendors and service providers to ensure vendors and service providers demonstrate the ability to complete the awarded work.
9. We recommend B&G design and implement procedures to ensure charges to purchase orders comply with purchase order descriptions and the underlying nature of the work competitively awarded.

Management Response:

6. The Office of Buildings & Grounds will work with the Purchasing Department on training for our staff for procuring goods and services.
7. The Office of Buildings has a standard operating procedure for purchasing and will expand it to include guidance on bid evaluation. The standard operating procedure will also include expectations for oversight of project work.
8. The Office of Buildings has a standard operating procedure for purchasing and will expand it to include guidance on evaluating vendors and service providers. The standard operating procedure will also include expectations for oversight of project work.
9. The Office of Buildings & Grounds will work with the Purchasing Department on training for our staff for procuring goods and services.

Process Owner: DeJuan A Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021

Issue 5 (2020.AU.15-05) – Management Actions Related to Project Fires. (High)

Based on interview of management, OIA noted the following weaknesses related to B&G's actions in response to and surrounding the fire incidents:

- B&G did not create and maintain records of its actions, conclusions, and communications to service providers following the initial fire or after subsequent fires.
- B&G did not require service providers to design and implement enhanced quality/inspection procedures to ensure proper retrofitting of fixtures following the initial fire and communication to the service providers of the determined cause.

- B&G did not independently verify proper retrofitting of fixtures following the initial fire or at any other location.
- B&G did not require service providers inspect any location(s) completed previously and up to the time of the initial fire for other instances of incorrect wiring. Based on examination of work completion date and/or invoice date, there were likely six locations which had been completed or in progress at the time of the initial fire.

Lack of documentation of management actions, conclusions, and instructions to service providers after the initial and subsequent fires increased the risk CCS would be unable to support its positions in the event of legal action arising from the fire incidents.

Lack of required enhanced retrofit inspection quality checks after the initial fire increased the risk of additional fires and increased risks to personal safety and CCS property.

Lack of independent verification of proper wiring of fixtures after the initial fire and at any location during the project increased the risk of additional fires and increased risks to personal safety and CCS property.

Lack of requiring service providers to reinspect locations already completed or in progress at the time of the initial fire increased the risk of additional fires at those locations and increased risks to personal safety and CCS property.

Recommendations

10. We recommend B&G create and maintain records of significant incidents, actions, and communications with contractors as part of a contractor monitoring and oversight file.
11. In instances of contractor performance which leads to significant risk to personal safety and CCS property, such as incorrect wiring of light fixtures leading to fire, we recommend B&G perform greater scrutiny of contractor performance to ensure actions which lead to the incident do not persist.

Management Response:

10. The Office of Buildings & Grounds will research and implement an incident tracking mechanism for monitoring and oversight.
11. The Office of Buildings & Grounds is working on building vendor performance into the bid package on future bids. The aforementioned standard operating procedure will include expectations for evaluating contractor performance.

Process Owner: DeJuan Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021

Issue 6 (2020.AU.15-06) – Payments to Contractors Exceptions. (Moderate)

OIA noted the following exceptions and conditions related to payments to contractors for project services:

- For three of 25 (12%) locations for one service provider and one of 17 (6%) locations for the other service provider B&G presented no documentation supporting the project management company verified the respective service provider's sheet of location rooms and lamps installed prior to approving payment of the respective service provider's invoice for the location. The invoiced amount of these services totaled \$70,573.
- For five of 26 (19%) locations for one service provider the service and/or amount the service provider invoiced and CCS paid did not agree to the service description and/or the amount in the awarded bid. The invoiced amount of these services totaled \$31,496.
- In three of 26 (12%) instances for one service provider the MUNIS invoice supporting payment was not mathematically accurate. In all three instances the invoice extensions were accurate; however, the total invoice amount was inaccurate and higher than the mathematical total. B&G records supported the higher amount. The variances in these invoices totaled \$2,164.
- One service provider performed work, invoiced, and CCS paid for services totaling \$55,883 for three locations not included in the awarded bid. The service provider did not complete nor receive payment for two locations included in awarded bid. The work for the "substituted" three buildings does not appear comparable to support substantial competitive bid compliance as the "substituted" buildings represented approximately 85% more lamp installations than was estimated in the bid for the two buildings not completed.
- The project management company verified only the quantity of lamps installed. Neither the project management company nor B&G verified the quantities of fixture rewires and lamp holder replacements invoiced by service providers and paid by CCS. The invoiced amount of these services totaled \$23,778.
- For two of two invoices (100%) from the original lamp supplier B&G did not obtain written evidence or take other actions to ensure the vendor actually delivered the correct quantity and type of lamps prior to approving the invoice.
- For two of two invoices (100%) from the original lamp supplier amounts invoiced and paid did not agree to the cost/price amounts included in the awarded bid. The vendor invoiced total amounts to match construction of two purchase orders to account for initial lamp purchase rather than per unit/lamp cost as included in the invitation to bid. The total amount invoiced by the vendor and paid by CCS agreed to the total amount of the awarded bid.

Lack of verification of the quantity of lamps installed, and quantities of fixture rewires and lamp holder replacements increased the risk the services or some portion thereof, were not actually performed and CCS paid for such services.

Lack of attention when approving invoices for services increased the risk CCS paid for services not authorized or called for in the bid scope of work and paid for services at the

incorrect rate. Lack of attention when approving invoices also increased the risk CCS paid invoices which were not mathematically accurate.

Lack of adhering to the bid ITB locations and substituting a level of work not comparable to the original bid increased the risk CCS did not comply with competitive bid regulations and increased the risk of allegations and legal claims of unfair selection and awarding of public work. Not adhering to the bid locations and not substituting comparable level of work also increased the risk of fraud, waste, and abuse through awarding unbid work.

Lack of ensuring delivery of invoiced lamps increased the risk CCS paid for lamps which were not actually delivered or did not comply with the bid specifications. Lack of requiring the lamp supplier to invoice consistent with the invitation to bid increased the risk lamps were invoiced at incorrect amounts.

Recommendations

12. We recommend B&G adhere to the ITB scope of work. If modifications are needed, we recommend B&G consult with CCS Purchasing and CCS Legal Services prior to taking action to ensure compliance with CCS policy and regulations governing the procurement of services.
13. We recommend B&G ensure it obtains and retains evidence procured goods and services were delivered or performed prior to approving invoice payment.
14. We recommend B&G ensure invoices contained accurate descriptions of work performed consistent with awarded bid language, services were invoiced at the correct rate, and invoices were mathematically accurate.

Management Response:

12. The Office of Buildings & Grounds will work with the Purchasing Department on training for our staff for procuring goods and services. The Office of Buildings & Grounds will follow the Purchasing Guidelines.
13. The Office of Buildings and Grounds will seek guidance from the Treasurer's Office and the Purchasing Department on developing a standard operating procedure for improving the approval process.
14. The Office of Buildings & Grounds will seek training guidance from the Treasurer's Office for invoice approval process.

Process Owner: DeJuan Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021

Issue 7 (2020.AU.15-07) – Noncompliance – Contractor Performance. (High)

B&G did not present evidence to demonstrate retrofit service providers, the project management company, and original lamp supplier complied with certain performance provisions of ITBs and CCS Vendor General Terms and Conditions.

- B&G paid a retrofit service provider \$27,744 for retrofit services at a location which was not a location identified in any bids awarded to the service provider.
- The retrofit service providers did not submit and B&G did not request a safety plan which included electrical and ladder safety, at a minimum.
- B&G did not request evidence retrofit service providers properly disposed of the fluorescent lamps removed. B&G records contained disposal certificates for some but not all buildings of one service provider and none from the other service provider. During the audit B&G contacted service providers and obtained disposal certifications from the service providers. The records obtained were not sufficient to fully account for the lamps removed.
- The ITB for project management services required weekly progress reports; however, B&G did not enforce the bid requirement. The project management company prepared MS Word narrative progress reports by location, rather than weekly, and did not prepare reports for all locations. B&G asserted it did not monitor or use the narrative reports in any fashion.
- For 8 of 25 (32%) awarded locations one retrofit service provider did not complete and invoice the work by the date deadline contained in the ITB. The other provider completed the awarded work by the ITB deadline.
- In 10 of 42 (24%) instances available records were insufficient to determine whether retrofit service providers invoiced within three days of completing work at a location.
- Contrary to CCS Vendor General Terms and Conditions #23, all invoices from the retrofit service providers, the project management company, and the lamp supplier were delivered to the B&G Supervisor via email rather than the CCS Treasurer's Office.

Lack of enforcement of ITB scope of work and specifications increased the risk paid for work would not meet district needs and expectations, lamps would not be properly recycled, and work would not be performed safely. Not adhering to the ITB locations increased the risk of fraud, waste, and abuse through awarding unbid work.

Lack of awareness of CCS Vendor General Terms and Conditions increased the risk of noncompliance with district policy and other requirements governing procurement of services.

Lack of effective project scheduling, management, and monitoring increased the risk the installation services would not be complete by the deadline in the ITB and the risk of missed external funding as a result of missing the deadline.

Lack of complete records such as documentation supporting completion of work at a location, increased the risk of being unable to demonstrate compliance in all respects with the ITB scope of work and specifications.

Recommendations

15. We recommend B&G enforce provisions in the ITB scope of work and specifications.
16. We recommend B&G retain documentation of significant relevant project milestones such as the date work is completed at a location.
17. We recommend B&G apply vendor/service provider monitoring and oversight procedures at the beginning of a project to ensure the ITB scope of work and other specifications are completed and adhered to.

Management Response:

15. The Office of Buildings & Grounds will continue to collaborate with the Purchasing Department on improving enforcement of the provisions of the project scope.
16. The Office of Buildings & Grounds will research and implement a project management mechanism for tracking major projects.
17. The Office of Buildings & Grounds will continue to collaborate with the Purchasing Department on improving enforcement of the provisions of project scope.

Process Owner: DeJuan Hood, Director of the Office of Buildings and Grounds

Implementation Date: May 31, 2021